City of Somerville — RFP nº 12-71

ADA Self-Evaluation (as basis for Transition Plan)



Prepared by Institute for Human Centered Design August 12, 2013



200 Portland Street, First Floor Boston, MA 02114 617-695-1225 voice/tty www.HumanCenteredDesign.org

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PART A

Executive Summary



Introduction

The Institute for Human Centered Design (IHCD) has prepared this report on behalf of the City of Somerville as part of the City's on-going effort to assess the current level of ADA compliance in Somerville's programs, services and activities and City-owned facilities. In preparation for the writing of the report, IHCD surveyed most of the City's portfolio of facilities and properties. 1 This portfolio includes seven municipal buildings, one police station, five fire stations, three libraries, nine schools, and several unoccupied buildings. The City also leases office space in the Tufts Administration Building in Teele Square and operates at least three facilities owned by the Massachusetts Department of Conservation and Recreation. Additionally, a total of 21 parks, 17 playgrounds, and 13 parking lots were included in the survey of facilities.²

Overall, the City of Somerville faces a city-wide challenge in ensuring access to all of its programs, services, and activities. Like many cities in the Commonwealth of Massachusetts, Somerville has a large number of aging buildings and other facilities that pose barriers to residents and City employees with disabilities, and the sheer amount of work that would be required to bring these older facilities into compliance is daunting. Somerville completed a number of accessibility-related renovations in the 1970s and 1980s, but many of these renovations are, unfortunately, not compliant with current accessibility standards.

In many instances Somerville has undertaken alterations and renovations to facilities after 1991. While Somerville does not have records to document the date of alterations, especially for improvements to a particular entrance or toilet room, the City needs to be aware that newly constructed or altered facilities or elements that were constructed or altered before March 15, 2012 and that do not comply with the 1991 Standards or with UFAS shall on or after March 15, 2012, be made accessible in accordance with the 2010 Standards.³ Likewise, the work shall also meet the current requirements of Massachusetts Building Code including 521 CMR Architectural Access Board Regulations. Further, it is important to note that those elements in existing City facilities that are subject to supplemental requirements of the 2010 ADA Standards (i.e., elements for which there are neither technical nor scoping specifications in the 1991 Standards) such as (C) Recreational boating facilities; (D) Exercise machines and equipment; (E) Fishing piers and platforms; (H) Play areas; (J) Swimming pools, wading pools, and spas; and (L) Miscellaneous - (1) Team or player seating and (3) Accessible route in court sports facilities, need to be brought into compliance with 2010 ADA Standards. Finally, many existing elements in the City such as sidewalks, ramps, parking lots, or restrooms have suffered from deferred maintenance that have

¹ At the end of the survey phase, IHCD identified additional City-owned or City-operated facilities were not included in the original contract. These facilities include, but are not limited to, SPS Central Administration Office at 42 Cross Street, Ralph & Jenny Senior Center at 9 New Washington Street, and Recreational Facilities (does not include Dilboy Stadium) at Alewife Brook Reservation.

² Sidewalks are not included in IHCD's scope of work but are addressed under another contract by a different party with oversight by Federal Highway Administration.

³ As described in **28 CFR 35.151(c) – Accessibility Standards and Compliance Date**⁴ As described in **28 CFR 35.150(b)(2)(i)**

failed to preserve or maintain accessibility features.⁵ As these are worked on, the 2010 ADA Standards must be met.

Broadly speaking, key facilities throughout the City such as the City Hall Annex, Cross Street Senior Center / Recreation, DPW Building, Recreation Building, Parking & Traffic Building, West Branch Library, the fire stations, and most of the older school facilities are either mostly or completely inaccessible. A number of other buildings and facilities are "functionally accessible" meaning that they are generally usable by people with disabilities but are not in full compliance with current accessibility requirements, though they may have been compliant when they were built or last renovated – before 1991. Somerville City Hall is an example of such a "functionally accessible" facility: the building features two accessible entrances, mostly accessible toilet rooms, and has accessible routes through most of the building, yet portions of the Aldermanic Chambers are inaccessible, some offices cannot be reached via an accessible route, and virtually none of the service counters are accessible.

When looked at in their entirety, the number of mostly or entirely inaccessible facilities throughout the City makes it difficult to ensure access to all of Somerville's programs, services, and activities. As a way of understanding the breadth and depth of the challenge the City faces, it is useful to consider the following partial list of everyday municipal activities in which people with disabilities may be unable to participate due to the nature of the facilities in which these activities occur:

- Obtain a residential parking permit or pay a parking ticket at the Parking & Traffic Building;
- Obtain a fire report at the Fire Department Central Headquarters;
- Attend school related events at the Brown School;
- Access toilet and locker rooms at various schools;
- Attend free community swimming hours at the Kennedy School pool;
- Apply for a building, plumbing, or electrical permit at Inspectional Services;
- In some cases, vote in local, state, or federal elections at precinct polling locations;
- Visit the office of Veterans Affairs;

56178, Sept. 15, 2010]

- Pick up a new recycling bin from the Department of Public Works;
- Participate on the Somerville High School rowing team;
- In some cases, attend a reading hour at the West Branch Library;
- Bring a young child to "Tot Time" at the Recreation Building.

On a positive note, most City-owned facilities – predominantly schools and playgrounds – built or renovated after the year 2000 are substantially more accessible and meet most architectural requirements. Continued facility replacements, alterations, and/or renovations will substantially

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⁵ It is important to bear in mind that **28 CFR 35.133 - Maintenance of Accessible Features** says: (a) A public entity shall maintain in operable working condition those features of facilities and equipment that are required to be readily accessible to and usable by persons with disabilities by the Act or this part. (b) This section does not prohibit isolated or temporary interruptions in service or access due to maintenance or repairs. (c) If the 2010 Standards reduce the technical requirements or the number of required accessible elements below the number required by the 1991 Standards, the technical requirements or the number of accessible elements in a facility subject to this part may be reduced in accordance with the requirements of the 2010 Standards. [56 FR 35716, July 26, 1991, as amended by Order No. 1694-93, 58 FR 17521, Apr. 5, 1993; AG Order No. 3180-2010, 75 FR

reduce barriers and realize Somerville's commitment to inclusion and equal rights. In the meantime, the greatest problems posed by existing barriers can be ameliorated by establishing policies and procedures to accommodate the public. It is worth noting that in the past 2-3 years, the City has taken several significant steps in this direction:

- Somerville has hired a consultant to evaluate Public Rights-of-Way throughout the City;
- Somerville has hired a consultant to undertake this ADA self-evaluation (as basis for the City's transition plan);
- Somerville has hired a full-time ADA Coordinator, Betsy Allen;
- Somerville is re-establishing a Commission on Disabilities.

⁶ Note that the ADA 2010 Standards Advisory 202.3 Alterations states: Although covered entities are permitted to limit the scope of an alteration to individual elements, the alteration of multiple elements within a room or space may provide a cost-effective opportunity to make the entire room or space accessible. Any elements or spaces of the building or facility that are required to comply with these requirements must be made accessible within the scope of the alteration, to the maximum extent feasible. If providing accessibility in compliance with these requirements for people with one type of disability (e.g., people who use wheelchairs) is not feasible, accessibility must still be provided in compliance with the requirements for people with other types of disabilities (e.g., people who have hearing impairments or who have vision impairments) to the extent that such accessibility is feasible.

Executive Summary of the Evaluation of Programs

Title II of the Americans with Disabilities Act (ADA) prohibits discrimination against qualified individuals with disabilities by public entities. Activities covered include all services, programs and activities offered by the public entity, all aspects of employment, services carried out by contractors, all activities of the local legislative and judicial branches and public transportation.

A thorough understanding of the requirements of Title II of the ADA is essential for public entities. The ADA administrative requirements help ensure that the needs of people with disabilities are addressed in all services, programs and activities that the City operates. A Title II entity is required to:

- 1. Designate a <u>Responsible Employee</u> (ADA Title II 28 CFR Part 35.107 (a)) to coordinate compliance with the ADA. The purpose of having a responsible employee ADA Coordinator is to ensure that when the public deals with a state or local government agency the public is able to identify a person who is knowledgeable with the requirements of the ADA. The City of Somerville has met its obligation to designate a responsible employee by appointing Betsy Allen to the position of Director and ADA Coordinator.
- Adopt and distribute a public <u>Notice</u> (ADA Title II 28 CFR Part 35.106) of the provisions of the ADA to members of the public who may participate in the City's programs, services and activities. The effective notice should state the City's obligations under the ADA and include the complete contact information of the ADA coordinator.

It appears from the survey submitted by staff that the City of Somerville does not have a uniform policy regarding the posting of ADA notices in its facilities. Some City departments reported that notices are not posted. Other departments reported that notices are posted in employee-only areas.

We recommend the information be provided on an ongoing basis wherever and whenever it's necessary to ensure that the City's commitment is clear to those who need the accommodation. It should be included in job applications, local newspaper, City's website and posted at all facilities where services, programs and activities are provided.

3. Develop and distribute <u>Grievance Procedures</u> (ADA Title II - 28 CFR Part 35.107 (b)) for prompt resolution of any complaint regarding disability discrimination.

From the survey's responses, it seems that some City departments are not aware of their ADA's obligation to provide grievance procedures, others departments refer to the City's grievance procedure.

We recommend the City take steps to clarify its grievance process with employees and members of the public and post that information in print and digital City information. IHCD would like to point out that this recommendation has already started to be implemented by the current ADA coordinator, who was hired by City after the survey's responses were submitted to IHCD.

- 4. <u>Modify its Policies, Practices and Procedures</u> (ADA Title II 28 CFR Part 35.130(b)(7)) when necessary to avoid discrimination.
 - We recommend that the City adopts policies, practices and procedures for responding to request for modifications by members of the public with disabilities. IHCD would like to point out that this recommendation has already started to be implemented by the current ADA coordinator.
- 5. <u>Maintenance of Accessible Features</u> (ADA Title II 28 CFR Part 35.133(a)) requires accessible elements and features to be maintained including electronic and physical accessibility features including but not limited to parking, sidewalks (including snow removal and temporary routes during construction), APS, curb ramps, ramps, elevators, lifts, power door openers, locks, dispensers, drinking fountains, assistive listening equipment, TTD/TTYs, etc.

Based on reports from Somerville staff and reviews of facilities, maintenance of many accessible features is needed however it is unclear how the City evaluates or prioritizes maintenance requests related to accessibility.

We recommend developing and or modifying building, department, and city wide policies to ensure accessible features are maintained and prioritized appropriately.

We also recommend adopting a snow removal and temporary pedestrian routes policy and suggest that the City of Cambridge and MassDOT have good models to work from.

6. Provide <u>Reasonable Accommodation</u> (ADA Title II – 28 CFR Part 35.140(a)) to qualified employees with disabilities. This requirement may include modifying work schedules, job restructuring, and making facilities used by employees readily accessible to an employee with a disability.

Some departments refer to the City's policies but not clear if staff knows the process for requesting reasonable accommodations.

We recommend complying with the requirement of reasonable accommodation by including appropriate inserts in materials and publications that contain general information disseminated to City's staff. We would also suggest that it be clearly included in the Personnel Policies. IHCD would like to point out that this recommendation has already started to be implemented by the current ADA coordinator

7. Provide <u>Auxiliary aids and services</u> (ADA Title II – 28 CFR Part 35.160) to ensure effective communication with people with disabilities. This provision requires ADA Title II entities to take steps to ensure that communication with members of the public and employees with disabilities is as effective as communication with others. This requirement may include providing sign language interpreters, written materials for persons who are Deaf or hard of hearing, Braille or

information in digital format for people who are blind or have difficulty seeing. It was not clear from the survey whether or not the City has specific policies or procedures for employees to provide auxiliary aids and services to members of the public, but there is also no evidence that they have failed to provide auxiliary aids and services when requested.

We recommend that the City provide notices to the public, including within notices of meetings and hearings, regarding the process of requesting auxiliary aids and services such as sign language interpreters and include any deadlines for requesting auxiliary aids and services. We also recommend the information be available in print format as well as be available in alternate formats. This would be very important to include in an accessibility section of the City's website as well as sites administered by departments such as the School Department. IHCD would like to point out that this recommendation has already started to be implemented by the current ADA coordinator.

- 8. Similar to many municipalities, Somerville DPW and FHWA informed IHCD that the city lacked policies related to a variety of US DOT regulations. Thus, Somerville has begun developing and adopting policies related to installing Accessible Pedestrian Signals and Detectable Warnings, upgrading of sidewalks, curb ramps and bus stops, defining Rights of Way alterations and ensuring public / stakeholder involvement in the development thereof as well as long-term upgrade plans. Additionally, Somerville lacked policies and procedures relative to snow removal and at the direction of Federal Highway Administration is revising examples from the City of Cambridge MA and MassDOT.
- 9. <u>Emergency Preparedness, Evacuation Plans, and Emergency Shelters</u>
 While a full review of Somerville's emergency preparedness, evacuation plans and emergency shelters was not part of this RFP, based on prior emergency shelter evaluation work and surveys of Somerville's physical facilities, the following general findings are worth noting:
 - Multi-story buildings did not regularly post up-to-date floor plans;
 - Information about evacuating people unable to navigate stairs was notably absent;
 - Schools and other facilities built after 1991 lacked designated Areas of Rescue Assistance (ADAAG 4.3.11) and accessible means of two way communication;

Elements not yet required by code:

- Schools and other large buildings do not have evacuation chairs;
- Designated MEMA and FEMA shelters such as schools may lack backup power for elevators and refrigeration;
- Designated MEMA and FEMA shelters such as most schools lack showers and locker rooms.

Recommendations:

- Conspicuously post up-to-date floor plans;
- Post information about evacuating people unable to navigate stairs;
- Develop evacuation plans for each facility;

- In facilities built or altered after 1991, provide designated Areas of Rescue Assistance (ADAAG 4.3.11) and accessible means of two way communication; in facilities built or alter after 3/15//2012, provide Areas of Refuge in accordance with IBC 2003 or newer;
- As MEMA/FEMA Functional Needs Support Services (F.N.S.S.) plans are developed or revised, adopt policies to ensure that community evacuation plans enable people with disabilities, including those who have mobility, vision, hearing, or cognitive disabilities, mental illness, or chronic health conditions, to safely self-evacuate or to be evacuated by others. Until all emergency shelters have accessible parking, exterior routes, entrances, interior routes to the shelter area, and accessible toilet rooms serving the shelter area, identify and widely publicize to the public, including persons with disabilities and the organizations that serve them, the locations of the most accessible emergency shelters. For more information see US DOJ's Making Community Emergency Preparedness and Response Programs Accessible to People with Disabilities http://www.ada.gov/emergencyprepguide.htm, ADA Tool kit: Emergency Management from Department of Justice http://www.ada.gov/pcatoolkit/chap7emergencymgmt.pdf and FEMA Guidance on Planning for Integration of Functional Needs Support Services

Additionally, we recommend considering, in partnership with MEMA and FEMA,:

 Engaging the National Fire Protect Association (NFPA) for evacuation training, guidance on evacuation chairs and their location in each facility;

in General Population Shelters - http://www.fema.gov/pdf/about/odic/fnss_guidance.pdf

- Acquiring evacuation chairs and locating them in stairwells;
- Providing and load verifying backup power source for elevator to address F.N.S.S. emergency shelter needs;
- Installing one or more accessible showers to meet emergency shelter needs;
- Providing backup power for refrigeration to meet emergency shelter needs.

Executive Summary of the Evaluation of Website

The 'somervillema.gov' website contains a number of features that enable users with a wide spectrum of abilities the opportunity to access information about the City of Somerville. At present, it meets some applicable portions of the World Wide Web's, Web Accessibility Initiative (W3C-WAI) Web Content Accessibility Guidelines (WCAG 2.0) and Section 508 of the Rehabilitation Act , but did not fully meet these web accessibility standards. The standards presented in Section 508 and the W3C-WAI's WCAG 2.0 provide the most robust set of guidance for a website that works well for users with the widest range of physical, sensory or cognitive abilities. WCAG 2.0 is also pertinent to this project because the U.S. Access Board is in the process of harmonizing Section 508 with WCAG 2.0 level AA. City of Somerville does well to align with these two standards because website accessibility becomes a requirement for state and local governments under Section 504 which states that "no qualified individual with a disability in the United States shall be excluded from, denied the benefits of, or be subjected to discrimination under any program or activity that either receives Federal financial assistance" and it includes provisions for ensuring "effective communication with people who have hearing or vision disabilities".

Users with disabilities, including those with low or no vision, limited or no hearing, physical /motor impairments will find that portions of the website are accessible but they currently *do* encounter difficulties with the usability or ease of use of certain aspects of the site. The City of Somerville also does utilize numerous external web-based service providers, (for instance Somerville public school; Somerville Library, request custodians service, pay your bill online) that were found to not be usable because of their lack of accessibility. Considerations need to be made to help external service providers improve their accessibility.

The website was generally observed to be hard to navigate due to a *confusing* organization of the information and the *lack of a consistent* layout. This resulted in a many users not being able to access large portion of information while navigating the website. Improvements made to simplify the layout would considerably ease the navigation for users with disabilities as well as older users and users who are using this website for the first time.

Findings

In general, the website was hard to navigate due to a *confusing organization* of the information and the *lack of a consistent layout*. This resulted in many users being unable to access large portions of

information while navigating the website. Simplifying the layout would considerably ease the navigation for users with disabilities as well as older users and non-native English speakers, or people who are using this website for the first time.

The main accessibility needs are listed below:

- Use of appropriate headings.
- Use "Skip Navigation to Content" links to effectively provide a standard method for users to bypass links and access core content.
- Provide labels for input buttons.
- Label with descriptive information ("Alt tags") all images and image maps.
- Use Cascading Style Sheets (CSS) instead of tables to visually layout blocks of related content.
- Ensure multi-media elements such as video and dynamic content are accessible and that
 accessibility features such as closed captioning and audio description are available and
 working.
- Use appropriate font sizes. Ensure that all the fonts increase proportionally.
- Provide enough contrast throughout the website.
- Use a consistent layout throughout the website.
- Ensure that the documents offered on the website (PDF, Word documents) are accessible.
- Identifying Logical Tab Order

The objective of this evaluation was not to develop an item-by-item listing of each accessibility issue, but rather to provide a summary of the most frequently occurring issues and highlight issues that have the biggest impact on the user's ability to obtain the needed information that is presented. This report highlights key issues and provides some illustrations of those issues through the provision of screen captures, markups and associated guidance where possible.

Executive Summary of the Evaluation of Facilities

Accessibility Survey Methodology

The analysis of existing conditions that comprises the body of the report is based on observations and documentation completed by multiple IHCD teams during site visits in the winter and spring of 2013. This accessibility survey included the following facilities:

Municipal Buildings:

M1 – City Hall*

M2 – City Hall Annex

M3 – Cross Street Senior Center/ Recreation

M4 - DPW Building*

M5 – Recreation Building

M6 – SCAT Building

M7 – Traffic & Parking

M8 – Tufts Administration Building

Libraries:

L1 – Central

L2 - East Branch*

L3 – West Branch

Police Station:

P1 – Public Safety Building*

Fire Stations:

F1 - SFD Central Headquarters*

F2 - SFD Engine 1 (former Engine 4)*

F3 – SFD Engine 3

F4 - SFD Engine 6*

F5 - SFD Engine 7*

Schools:

S1 - Argenziano*

S2 - Brown*

S3 - Capuano*

S4 -Next Wave & Full Circle

S5 – Healey

S6 - High School*

S7 - Kennedy*

S8 - Winter Hill*

S9 – West Somerville Neighborhood

Cummings School – ELIMINATED

East Somerville Community School – IN

CONSTRUCTION

Unoccupied Buildings:

U1 - Tufts Field House

U2 – Prospect Hill Tower

Homans Building and Powderhouse Community

School - ELIMINATED

DCR-Owned:

D1 – Dilboy Stadium

D2 - Boat House

D3 – Veterans Memorial Rink

Due the nature of the continual need for upkeep and renovation in older cities like Somerville, it can be difficult to determine when a building or facility may have been renovated or altered. Therefore, IHCD's review of the City-owned facilities was based on compliance with the 2006 MAAB and 2010 ADA Standards for new construction for each element assumed to have undergone renovation or alteration. Any altered facilities or elements that were constructed or altered before March 15, 2012, and that do not comply with the 1991 Standards or with UFAS shall on or after March 15, 2012, be made accessible in accordance with the 2010 Standards. Likewise, the work shall also meet the requirements of Massachusetts Building Code including 521 CMR Architectural Access Board Regulations.

^{*} Facility used as polling place.

In addition to the above facilities, IHCD also surveyed the following parks, playgrounds, and parking lots:

Parks (21):

Bailey Kenney Paul Revere Central Hill Lexington Perry Conway Lincoln/Argenziano School Seven Hills **Edward Leathers Community** Nathan Tufts / Powderhouse Statue North Street / Veterans Glenn Stone Place Nunziato Field Grimmons Trum Field Walnut Street Hodgkins-Curtin Osgood

Playgrounds (17):

Albion Healy School Community Palmacci
Cummings School Hoyt-Sullivan Perkins
Dickerman Kennedy School Community Trum

East Somerville School Marshal Street Winter Hill Community School

Florence Morse-Kelley Woodstock

Harris Otis

Parking Lots (13):

Buena Vista Grove Street B Veterans Memorial Rink

Cutter Square Magoun Square Winter Hill A
Day Street Mount Vernon Street Winter Hill B

Foss Park Prospect Hill
Grove Street A Union Square

The accessibility survey included considering the following elements: gates, walking surfaces and slopes, benches, drinking fountains, tables, play areas, recreational areas, and maintenance of accessible features. It is also important to note that those elements in existing facilities that are subject to supplemental requirements of the 2010 ADA Standards (*i.e.*, elements for which there are neither technical nor scoping specifications in the 1991 Standards) such as (C) *Recreational boating facilities*; (D) *Exercise machines and equipment*; (E) *Fishing piers and platforms*; (H) *Play areas*; (J) *Swimming pools, wading pools, and spas*; and (L) *Miscellaneous - (1) Team or player seating* and <u>(3)</u> *Accessible route in court sports facilities*, need to be brought into compliance.⁷

⁷ As described in **28 CFR 35.150(b)(2)(i)**

Program Accessibility

Many programs, services, and activities that are offered to the public are located in inaccessible facilities or in facilities with certain inaccessible features throughout the City of Somerville. For instance, four of the seven municipal buildings are inaccessible, one of the three libraries is inaccessible, and four of the five fire stations (most of them used as polling places) are inaccessible. Although, in theory, programs, services, and activities can be relocated to an accessible space upon request in certain facilities (e.g., City Hall and SCAT Building), it is much more difficult to entirely relocate programs, services, and activities such as those provided at City Hall Annex, Cross Street Senior Center / Recreation, DPW Building, Recreation Building, West Branch Library, and Parking and Traffic. With that said, providing duplicated services at other locations or the temporary relocation of services based upon individual requests is the best solution for the foreseeable future until such time when these buildings are completely renovated or replaced.

Given this situation, IHCD has made several recommendations in order to increase accessibility of programs, services, and activities provided by the City of Somerville. These recommendations are organized into four distinct categories:

- 1. Relocation of programs, services and activities within current facility;
- 2. Relocation of programs, services and activities to another facility;
- 3. Short-term renovations to ensure access to programs, services and activities;
- 4. Improvements at Fire Stations.

Recommendations:

- 1. Relocation of programs, services and activities within current facility

 Often the simplest solution is for the City to use what it already has in place. IHCD strongly recommends the relocation of programs, services and activities to accessible locations within:
 - <u>City Hall</u>: On the basement level, the Constituent Services 311 office is located on an
 inaccessible route. A non-compliant inclined lift with an expired certificate is provided at a
 short stairway to access this office. Programs, services, and activities offered at this office
 should be relocated to another office that is connected to an accessible route. The website as
 well as permanent signage should indicate this accommodation.
 - SCAT Building: At least one classroom on the first floor of the Public Access Station (Channel 3) is located on an inaccessible route. A stairway with missing handrails is provided to access this space. Programs, services, and activities offered at this classroom should be relocated to another classroom that is connected to an accessible route. The completely inaccessible second floor is being used by the non-profit Massachusetts Association of Portuguese Speakers (MAPS) for classes and meeting, including Alcoholics Anonymous or similar groups.

The City does not offer programs, services, or activities at SCAT and programs, services, or activities provided by the non-profits that lease the building are not under the City's control.

• <u>High School</u>: An outdoor classroom is provided in the courtyard between buildings B and C on the first floor. The courtyard is several feet below the interior finish and can only be accessed through a stairway with missing handrails. Programs, services, and activities offered at this classroom should be relocated to another outdoor location that is connected to an accessible route. Similarly, the High School also has a TV Studio and Daycare on site; however, in surveying the building, we found no interior accessible routes to the TV Studio without cutting through either the Daycare or locker rooms. Thus the TV Studio is likely not accessible during non-school hours. Additionally the raised broadcast area lacks a ramp.

2. Relocation of programs, services and activities to another facility

When not possible to relocate them within the current facility, program, services, and activities should be relocated to an accessible facility. The following program, services, and activities are offered in inaccessible buildings. IHCD strongly recommends the City identify other accessible facilities within the City where these programs, services and activities could be relocated:

- <u>Cross Street Elderly Center / Recreation</u>: This 2-story former fire station houses the Senior Center on the first floor and Recreation on the inaccessible second floor. All programs, services, and activities provided on the second floor are inaccessible because the building lacks an elevator. On the first floor, the Senior Center has completely inaccessible toilet rooms and narrow doorways.
- <u>DPW Building</u>: In many municipalities, DPW buildings are employee-only facilities. However, in Somerville, residents must visit the facility to apply for building permits as well as sign up for recycling bins and appliance disposal. This 3-story facility functions like a maintenance department for the entire city. Among other departments, Fire Department Prevention Services, which is part of the Fire Department, can be found on the basement level.
- Recreation Building: The offices for the Recreation and Youth Commission are housed in this 3-story inaccessible facility. The Commission hosts sports programs and activities for children and adults year-round, making use of the City's various indoor and outdoor recreation facilities. The Commission also strives to raise community awareness among the city's youth and to engage them in healthy activities. Programs, services, and activities, such as 'Tot Time', 'Come Inside and Play!', 'Counselor Consultation', and 'Coupon Training Class' are offered at this facility.
- West Branch Library: Books are not all that is offered in the City's libraries. Programs, services, and activities in this library branch include children's story times, young adult chess club, book clubs for all ages, film screenings, occasional performances, lectures, and English as Second Language (ESL) classes. Community groups may use the assembly room on the second floor to hold meetings. IHCD would like to point out that the current ADA coordinator has already started to relocate certain programs, services, and activities to other branches.
- <u>SFD Central Headquarters</u>: Many services, including permits, fire reports, and child car seat inspections are offered on the second floor offices of this fire station.

- 3. Short-term renovations to ensure access to programs, services and activities

 Sometimes small projects can greatly improve the level of accessibility at facilities. IHCD strongly recommends the immediate renovation of the following facilities:
 - <u>City Hall Annex</u>: Over a dozen City offices and departments occupy this 1950's building. They include the Office of Sustainability and Environment, the Somerville Arts Council, Veterans' Services, the Health Department and its divisions, and the Housing Division of the Mayor's Office of Strategic Planning & Community Development. While the City likely intends to completely replace this facility in the future, IHCD recommends the immediate upgrading of the lift at the public rear entrance to be fully automated with independent access. Although this solution is not at all optimal from a user standpoint, it offers a short-term option until programs, services, and activities are relocated to a fully accessible location. For more information, refer to the Structural Accessibility section of this report.
 - <u>Cross Street Elderly Center / Recreation</u>: This 2-story former fire station houses the Senior Center on the first floor and Recreation on the inaccessible second floor. Although programs, services, and activities provided on the first floor are accessible through an at-grade entrance, IHCD recommends the immediate upgrading of toilet rooms provided inside the Senior Center. For more information, refer to the Structural Accessibility section of this report.
 - Traffic & Parking: This facility is where residents must apply for parking passes, emergency parking signs or contest a ticket. At some point a stair lift was added but it is not independently operable nor does it meet the clear space requirements for approach and boarding. Given these conditions and that many people with disabilities avoid lifts because of common breakdowns and unsafe conditions, IHCD recommends the immediate removal of this lift and the conversion of the rear service entrance into a new accessible public entrance. Although this solution is not optimal from a user standpoint customers likely would need to circulate through staff only areas in order to reach the public area it offers a short-term option until programs, services, and activities are relocated to an accessible location. For more information, refer to the Structural Accessibility section of this report.
 - <u>Central Library</u>: As a 'Carnegie Library', this facility will always remain a library regardless of whether the City builds a new library at another location. With this in mind, IHCD recommends a planned and thought out rearranging or reducing furniture and book shelves on the second floor and mezzanine level in order to provide more aisle room as well as a study to upgrade the elevator cab size. For more information, refer to the Structural Accessibility section of this report. IHCD would like to point out that the current ADA coordinator has already started to implement most recommendations mentioned above.
 - <u>East Branch</u>: Although the ramp that leads to the public entrance is generally usable by
 persons with disabilities, it does not meet all of the requirements of applicable accessibility
 standards. IHCD recommends modifying this non-compliant ramp so that the surface and
 handrail issues are corrected. For more information, refer to the Structural Accessibility
 section of this report.

4. Improvements at Fire Stations

Paramount to Somerville's ADA obligations regarding emergency services is ensuring programmatic access to emergency services such as Enhanced 911, emergency planning and preparedness, as well as ensuring access to all residents during elections. IHCD recommends the following improvements to all fire stations:

- Emergency Call Boxes and Doorbells: In terms of prioritization of access to fire stations, the
 City of Somerville needs to ensure that exterior emergency call boxes and doorbells are
 accessible, within reach range and located on accessible routes. This ensures that
 members of the public who arrive at a station can contact station staff in emergency
 situations. For more information, refer to the Structural Accessibility section of this report.
- Polling Places within Apparatus Bays: Where stations lack accessible routes into the building, procedures should be developed to ensure that at a minimum, the public is allowed into the apparatus bay where department personnel can address the specific need.
 Additionally, existing temporary ramps should be modified or replaced with compliant versions. For more information, refer to the Polling Places section of this report.

Structural Accessibility

City-owned buildings range in levels of accessibility; however, these levels are not meant to be construed or understood as conveying legal interpretation of complete or partial compliance. Rather, for the purpose of this report, IHCD has assigned categories of 'functional accessibility' to each facility for ease of reference:

- Accessible The facility is accessible to a wheeled mobility device user or person with mobility challenges;
- **Mostly Accessible** A wheeled mobility device user or person with mobility challenges can enter the facility, access the primary function within that facility and access the restroom;
- **Moderately Accessible** A wheeled mobility device user or person with mobility challenges can enter the facility, access the primary function within that facility;
- **Minimally Accessible** A wheeled mobility device user or person with mobility challenges can enter the facility;
- **Inaccessible** A physical barrier exists that would prevent a wheeled mobility device user from entering the facility.

Finally, it is worth noting that there is a general propensity to want to assign 'scores' or rating scales to buildings or even to a municipality overall. These scores, while seeming to help in setting priorities, mask the nuances and complexities involved in ensuring access to programs, services, and activities.

Scoring has no basis in the accessibility laws or building code. It's important to stress that the primary obligation to public entities such as the City of Somerville, under both Section 504 of the Rehabilitation Act and the Americans with Disabilities Act Title II, is to ensure that, when 'viewed in its entirety' the programs, services, and activities offered are equally available to people with disabilities.

A. Municipal Buildings

While a majority of City offices are located at City Hall, a city with a population of at least 76,000 cannot hold all services in one building. The City of Somerville owns and operates seven municipal buildings spread through most wards of the city:

- M1 City Hall
- M2 City Hall Annex
- M3 Cross Street Elderly Center/ Recreation
- M4 DPW Building
- M5 Recreation Building
- M6 SCAT Building
- M7 Traffic & Parking

Although not a City-owned facility, programs, services, and activities are offered at the Tufts Administration Building (M8 – TAB). The City did not originally identify this facility for evaluation under the original contract; however, based on discussions with the City and given the programs, services and activities provided at this facility, IHCD reviewed the Somerville's portion of the facility.

Inaccessible

IHCD found the following municipal buildings to be inaccessible:

- M2 City Hall Annex
- M4 DPW Building
- M5 Recreation Building
- M7 Traffic & Parking

None of these facilities have at-grade entrances since the interior floor level is several feet above the exterior grade. While two facilities have not had any accessibility updates in many decades (DPW Building and Recreation Building), there has been an attempt to increase the accessibility at the remaining facilities (City Hall Annex and Traffic & Parking) with the installation of a limited use / limited access elevator and an inclined lift. It is unclear whether these devices had been code-compliant at the time of their installation, the units do not meet the minimum requirements for clear space, weight capacity, independent access, etc. of the current accessibility laws and regulations.

While it is conceivable that three of these facilities could be renovated and new vertical circulation systems installed (City Hall Annex, DPW Building, and Recreation Building), the City of Somerville should consider relocating all programs, services, and activities offered to the public to an accessible location and use the existing spaces for back-office support, i.e. non-public, limited staff. If the City opts

to renovate these facilities, extensive modifications to all public areas as well as stairways, toilet rooms for public use, and signage must also be implemented.

Aside from building entrances, accessible routes from transit, streets and accessible parking can be problematic. Except for City Hall Annex, no accessible parking is provided at the facilities mentioned above. Additionally, accessible routes and curb ramps are significantly compromised at most municipal buildings.

M2 – City Hall Annex

IHCD recommends the following interim improvements for City Hall Annex:

- Replace curb ramps and sidewalks adjacent to building;
- Repair or resurface driveway and accessible parking spaces;
- Modify accessible toilet rooms;
- Other miscellaneous non-structural modifications such as removal of protruding objects and securement of weather mats.

M7 – Traffic & Parking

IHCD recommends the following interim improvements for Traffic & Parking:

- Removal of the inclined stair lift at the public entrance and the installation of compliant railings on both sides of the stairway to the lobby;
- Add an accessible ramp to the service entrance at the rear of the building.;
- Provide a sign at the Holland Street entrance to direct customers using wheeled mobility devices
 or those who cannot navigate stairways to the new accessible entrance. At the new accessible
 entrance, an intercom should be provided to alert employees that a customer needs assistance.
 Although this solution is not optimal from a user standpoint customers would need to circulate
 through staff only areas in order to reach the public area it offers a short-term option until
 programs, services, and activities are relocated to an accessible location.
- Make the necessary improvements to the staff toilet rooms and install compliant signs to identify them;
- Install a sign in the lobby to alert customers that toilet rooms are offered upon request;
- An accessible counter can be provided by adding an accessible table in lieu of a renovation.

M4 – DPW Building and M5 – Recreation Building

Given the age and conditions of these two facilities, IHCD recommends that the City explore the feasibility of major renovation versus replacement. In the interim, the City of Somerville should look at relocating all programs, services, and activities offered to the public to an accessible location and use the existing buildings for back-office support, i.e. non-public, limited staff.

Mostly Accessible

IHCD found the following municipal buildings to be mostly accessible:

- M1 City Hall
- M6 SCAT Building

Both facilities offer accessible entrances on accessible routes, which are connected to parking and public transportation. While SCAT Building has an at-grade entrance, City Hall has entrances on two floor levels several feet above the exterior grade. Sometime in the last few decades, ramps were installed at both City Hall entrances – the main entrance near the High School / accessible parking, and the basement entrance on School Street – to increase the accessibility at City Hall. School Street has the added benefit of a much smaller elevation change and access to both the accessible restrooms and elevator. Although the ramp on the School Street entrance may have been code-compliant at the time of its installation, its handrails and walking surfaces must be brought to the current accessibility laws and regulations.

The SCAT building is a former fire station that the City still owns but gives it to two non-profit organizations, Somerville Community Access TV (SCAT) and Massachusetts Association of Portuguese Speakers (MAPS), for their use. According to information provided by the current ADA coordinator, the City does not offer programs, services, or activities at SCAT and programs, services, or activities provided by the non-profits that lease the building are not under the City's control.

M1 – City Hall

IHCD recommends the following improvements at City Hall:

- Replace railings and walking surface along the ramp at the School Street entrance;
- Either reconstruct and level the landing or install a power door opener on School Street entrance;
- Install accessible locks on the doors of the single-user toilet rooms on the basement level;
- Make other non-structural modifications to the single-user toilet rooms on the basement level and multi-user toilet rooms on the second floor;
- Design and construct a ramp to the raised Council area;
- Acquire an adjustable height podium for the Council Chamber;
- Remove inclined lift on the basement level and develop policies and procedures to ensure access to programs and services located in the inaccessible Constituent Services 311 office;
- At all counters for sale or service on all floor levels including Treasury, Tax Collector, and City Clerk on the first floor and Election Census on the basement level –, ensure that a portion of each counter is at least 36 inches wide and no more than 36 inches above the floor. Alternatively, provide an auxiliary counter with a maximum height of 36 inches in close proximity to the main counter, or provide equivalent facilitation. Equivalent facilitation may be provided in the form of a folding shelf attached to the main counter, an auxiliary table nearby, a clipboard made available to the public, or other means. In lobby of the first floor, ensure that boxes, planters, and other obstructions are not impeding the approach to the information counter;

 Implement a comprehensive signage plan to ensure that accessible signage is provided at all spaces. On the first floor, remove the International Symbol of Accessibility from the sign of the inaccessible staff-only toilet room.

Safety and Usability Recommendations:

• Adjust timing on automatic doors of the single-user toilet rooms on the basement level;

M6 - SCAT Building

Since the City of Somerville does not offer any programs, services, and activities at the SCAT Building, IHCD is unable to make recommendations under Title II of the Americans with Disabilities Act. However, if the City intends to renovate the building in the future, the City should consider the following accessibility improvements:

- Either install an automatic door opener on both sides of the entry door or re-grade concrete walkway to be flush with granite threshold of the entry door;
- Lower doorbell to 48 inches above the ground;
- Install signs at all inaccessible entrances to direct the location of the accessible entrance;
- Make minor modifications to the toilet rooms:
- Install handrails along the stairway that leads to the exit and the stairway that leads to the classroom;
- Implement a comprehensive signage plan to ensure that accessible signage is provided at all spaces.

Long Term Recommendation

Identify strategies to provide vertical access to the second floor;

B. Libraries

The City of Somerville owns and operates three library buildings that were built in the early 20th century. While a few improvements have been done in recent years, no library has been renovated since the 1970's:

- L1 Central
- L2 East Branch
- L3 West Branch

When looked at in entirety, Somerville's libraries offer an impressive array of programs and services in addition to the standard inter-library loan program. These programs include but are not limited to Dropin Mediation, Creative Writing, How to Publish Your Work, Preschool Story Time, Babygarten Story Time, Learn English at the Library, Sing-A-Long, various book readings, etc. While some of these are offered at all branches, not all are or are offered at a similar time. Further, though many also occur or are based at the main / Central library, as noted below, the Central branch has notable barriers including the lack of accessible toilet rooms. Likewise individual branch hours and amenities or features appear to differ. While Somerville is a compact city, given the lack of access at West Branch, significant barriers at Central and some barriers at East Branch, it appears that when looked at in entirety, there remain barriers to accessing all programs, services and activities offered by Somerville Public Library.

Inaccessible - L3 - West Branch

The West Branch Library does not have accessible parking or an at-grade entrance. At both entrances – in the front to the first floor and at the rear to the basement – the interior floor levels are several feet above or below the exterior grade. Stairways with missing or non-compliant handrails render this facility completely inaccessible. It is not uncommon for strollers to be parked, rain or shine, outside the rear entrance. One single-user toilet room for staff and public use is provided on the basement level. Although this toilet room offers a few accessible features, it cannot be considered accessible because it is not located on an accessible route.

Somerville is exploring how the West Branch Library can be renovated with a new accessible entrance, vertical circulation system, and accessible toilet rooms be provided. In the interim, the City of Somerville should look at ensuring all programs, services, and activities offered to the public at the West Branch are also offered at an accessible location. If the City opts to renovate this library branch, extensive modifications to parking, service counters, furniture (reading and computer desks) as well as signage in public areas will need to be included.

Minimally Accessible - L1 - Central

Last renovated in 1975, the Central Library has an at-grade public entrance with automatic doors, an elevator that serves all floor levels, some lowered counters and modified restrooms that may have been code compliant at the time. However, significant barriers remain, most notably:

- Elevator dimensions that do not meet MAAB, UFAS, or ADA requirements (even going back to mid-1980's);
- Inaccessible toilet rooms (for adults and children use) on the first floor;

• Circulation routes around and through stacks that not only lack required turning clearances but frequently lack 36-inch clear width on the second floor and mezzanine level.

Given these conditions, Somerville needs to address the conditions at Central Library as a priority after or simultaneous with addressing the issues at the West Branch.

Moderately Accessible - L2 - East Branch

The East Branch Library has its interior floor level a few feet above the exterior grade. In recent decades, there has been an attempt to increase the accessibility at the East Branch Library with the installation of a ramp to the building entrance. Although a few improvements should be done at the ramp of the East Branch Library, this facility offers an accessible entrance on an accessible route, which is connected to parking and public transportation. According to drawings provided by the City of Somerville, the East Branch library underwent major renovations that included the installation of accessible toilet rooms for public use. Although these toilet rooms may have been code-compliant at the time of their installation, they do not meet the minimum requirements of either 1991 or the current accessibility laws and regulations. Bringing these amenities to compliance will incur extensive modifications to plumbing and fixture layout. Additionally, moderate modifications to the circulation counter, furniture (reading and computer desks) as well as signage in public areas should be implemented.

C. Police Station

The City of Somerville owns and operates one police station located in Union Square. The Public Safety Building, as it is known, can be entered though both Somerville Avenue and Washington Street. This facility houses the police station on all three floors, although part of the first floor is also used by Fire Engine 3 and the Auxiliary Fire & Prevention Unit.

Moderately Accessible

The Public Safety Building has entrances on two floor levels several feet above or below the exterior grade – one at Washington Street, the other on Somerville Avenue. According to drawings provided by the City of Somerville, the Public Safety Building underwent major renovations in 1985 that included the installation of ramps to the entrances. Additionally over the winter of 2012-2013, basement areas were gutted and outfitted with locker rooms, showers, toilets, a kitchenette, conference rooms and enclosed outdoor patio. These facilities, despite being new, are largely inaccessible.

Also as part of the 1980's renovation, accessible toilet rooms for public use where installed near the Washington Street entrance on the second floor. Although these toilet rooms may have been code-compliant at the time of their installation, they do not meet the minimum requirements of the current accessibility laws and regulations. Bringing these amenities to compliance will incur extensive modifications to plumbing and fixture layout. Additionally, moderate modifications to information and reception counters and drinking fountains in the lobby and cells on the second floor as well as signage in public areas should be implemented.

IHCD recommends the following improvements at the Public Safety building:

- Ensure accessible parking spaces and access aisles are clearly striped and signed;
- Repair or replace front and rear ramps;
- Install signs at all inaccessible entrances to direct the location of the accessible entrance;
- Renovate toilet rooms;
- Correct brand new inaccessible basement renovations including inaccessible showers, toilets, kitchenette, and route to patio;
- Implement a comprehensive signage plan to ensure that accessible signage is provided at all spaces.

D. Fire Stations

The City of Somerville owns and operates five fire stations located in Union Square, Teele Square, Wilson Square, Spring Hill, and Winter Hill that also serves as the department headquarters. The Somerville Fire Department's fire stations are staffed by approximately 150 full-time firefighters, of which roughly half are trained EMTs. The Fire Prevention Office is located at the inaccessible DPW Building at 1 Franey Road. The all-volunteer Somerville Auxiliary Fire Department provides support for both City firefighters and police via three squads that provide lighting for emergencies, water pumping during

flooding, and on-scene rehabilitation services. Finally, at the second floor of the inaccessible headquarters, the public has access to services including fire reports and carbon monoxide detectors.

While few improvements have been done in recent years, no fire station has been substantially renovated for decades:

- F1 SFD Central Headquarters
- F2 SFD Engine 1 (former Engine 4)
- F3 SFD Engine 3
- F4 SFD Engine 6
- F5 SFD Engine 7

Fire Stations commonly are designed in two forms regardless of the year built: single- story structures with staff spaces on one or more sides of the apparatus bay or multi-story structures with staff spaces above the apparatus bay. Regardless of whether a station houses one truck or two trucks, each station has a dispatch office, day room, crew sleeping quarters, kitchen, lockers, showers and toilet rooms.

Similar to many other municipalities, the multi-story stations (Central Headquarters, Engine 6, and Engine 7) are not equipped with elevators and have undergone little or no accessibility upgrades in common areas, toilet rooms or showers. While many people assume accessibility and especially elevators, are not required by the ADA at fire stations, this is a mistaken assumption. Fire stations are typically thought of as employee work areas and therefore subject to requests by employees for reasonable accommodations such as accessible toilet rooms, parking, etc. However, by their nature, fire stations are also frequently and unofficially visited by the public whether by nursery and elementary classes, Girl and Boy Scout troops, neighbors, or the public during Fire Protection Week open houses. Likewise, apparatus bays are often used as polling places.

In the City of Somerville, with the exception of Engine 3, all stations are used as polling places. Polling locations located in fire station apparatus bays may either have temporary ramps or only be accessed via opening apparatus bay doors. Providing access via opening apparatus bay doors obviously can be problematic in November or early Spring elections. Further complicating matters is the driveway slope up to the apparatus bay often exceeds 5% or even 8% at certain fire station, such as at Engines 1 and 6. Finally, at Engine 6, the entrance requires voters to go up and down stairs that lack handrails.

Located in strategic areas known to residents, fire stations, as needs arise, can also serve many purposes such as meeting locations for neighborhood committees, vaccination clinic locations for people or pets, emergency shelters or aid distribution locations post disaster. While many of Somerville's stations may not fill any of these roles currently, future uses are unpredictable. Finally, as Somerville can attest, after decommissioning, fire stations often take on a second life, reused by non-profits, open artist studios, community centers or youth centers – for example: The SCAT Building used to be Fire Engine 1 and Cross Street Elderly Center / Recreation used to be Fire Engine 2. Thus, achieving physical accessibility remains critical, albeit secondary to achieving

programmatic access to the Fire Department's services.

Inaccessible

Fire stations in this category include:

- F2 SFD Engine 1
- F3 SFD Engine 3
- F4 SFD Engine 6
- F5 SFD Engine 7

While Engines 6 and 7 have an at-grade public entrance, Engines 1 and 3 have their interior floor level a few feet above the exterior grade. While most fire stations have not had any accessibility updates in many decades, there has been an attempt to increase the accessibility at Engine 3 with the installation of a ramp and an accessible parking space near the entrance on Somerville Avenue. Although the ramp and parking space may have been code-compliant at the time of their installation, they do not meet the minimum requirements of the current accessibility laws and regulations. Actually, the ramp has become a serious hazard due to its lack of maintenance.

According to a fire captain at Engine 3, programs, services, and activities at this facility have been relocated to the inaccessible second floor of Central Headquarters and the inaccessible DPW Building in recent years. A trailer that serves as the crew sleeping quarter is attached to Engine 3, which takes part of the basement level of the Police Station. Oddly, the only fire station that does not interact with the public is the only fire station with parking for public use.

At the entrance of Engine 1, a stairway with missing handrails renders this fire station completely inaccessible.

Aside from building entrances, accessible routes from transit and streets can be problematic at most fire stations. Accessible routes and curb ramps are significantly compromised at Headquarters, Engine 1, and Engine 3.

Minimally Accessible - F1 – SFD Central Headquarters

While the public may get into the other fire stations through the apparatus bay, Central Headquarters offers programs, services, and activities to the public on the inaccessible second floor. While it is conceivable that the Central Headquarters can be renovated and a new vertical circulation system, and accessible toilet rooms be provided, the City of Somerville should look at relocating all programs, services, and activities offered to the public on the second floor to an accessible location and use the existing spaces for back-office support, i.e. non-public, limited staff. If the City opts to renovate this fire station, extensive modifications to all public areas as well as counter, stairways, toilet rooms for public use, and signage will also be needed.

E. Schools

The City of Somerville owns and operates nine public school buildings:

- S1 Argenziano
- S2 Brown
- S3 Capuano
- S4 Edgerly/Next Wave-Full
- S5 Healey
- S6 High School
- S7 Kennedy
- S8 Winter Hill
- S9 West Somerville Neighborhood

In regard to emergency evacuation, IHCD was not tasked with reviewing school evacuation plans, procedures or equipment however, IHCD notes that it was unclear how anyone unable to navigate stairs would either find a smoke proof area to wait in, contact emergency personnel or be transported. For those reasons, IHCD is recommending Somerville work with the National Fire Protection Association on policies, procedures and training as well as the acquisition and location of Evacuation Chairs.

Inaccessible

S2 – Brown

The Brown School is a turn of the 20th century, 3-story brick structure that lacks an elevator. At some point, an attempt was made to construct an accessible entrance to two classrooms on the basement level, although the ramps do not meet code requirements. Absent a major renovation, the Brown School cannot become accessible.

Minimally Accessible

S6 – High School

Located along Highland Avenue between City Hall and the Central Library, the High School is an interconnected six-building complex made primarily of brick and concrete masonry units. Buildings A, B, C, and D date to the early 1900's with the remaining buildings dating up to the 1980's. Older buildings are four or five stories including habitable basements. Buildings E and F have three stories, primarily housing the gymnasium and various shop classrooms, some of which have access to a rear service driveway. The basement and the first floor connect all buildings. The building's main entrance consists of the original exterior stairway to building B as well as occasional use of the accessible entrance at building E (Gym). At some point, an accessible entrance with a high walled switchback exterior ramp was constructed between buildings C and D. Two elevators are provided in this school, an older and smaller model in building B and a newer pass-through model in building F, approximately 750 feet away. Non-functioning lifts are found in the Auditorium (for stage access) and in the library (for mezzanine access).

Students are allowed to use toilet rooms in the basement of building B (near Cafeteria) and at the Gym. Elements of the student toilet rooms are the most accessible; however, there is an overarching problem of accessing student toilet rooms because it requires travel in excess of 200 feet and the use of either stairways or an elevator. Toilet rooms for staff are provided on all floors in all buildings. Toilet rooms for public use are located near the main office and at the gym. Locker rooms are provided in several shops in addition to the gym. Additionally, toilet rooms have a number of specific issues that can be dealt with by maintenance personnel.

Alongside the development of policies and procedures to address a number of conditions, given these overall findings, the following distinct projects should be undertaken as soon as possible:

- Train staff to answer accessible entrance intercoms and install video surveillance. Develop policies and procedures to ensure accessible entry during non-school hours. Immediate Priority
- 2. Demolish and reconstruct accessible entrance ramp and entry. Remove walls to improve visibility, safety and security, provide a video camera, accessible intercom and automatic door opener.
- 3. Either modify or renovate existing multi-user toilet rooms or construct one single-use accessible toilet room on each floor of buildings A, B, C, D, & F. Begin with upper floors as an immediate step.
- 4. Replace curb ramps and repair sidewalks.
- 5. Re-grade, resurface and re-stripe accessible parking.
- 6. Consider acquiring evacuation chairs, locate chairs in stairwells.

Then, because of the age of the buildings and the complexity of these projects, the City should evaluate replacing the building instead of renovating it prior to completing the following steps:

- 1. Replace removable floor panels and remove tripping hazards, especially at the basement level.
- 2. Provide an accessible version of each type of science and shop workstation.
- 3. Renovate various locker rooms to be accessible.
- 4. Establish an internal accessible route between the auditorium, stage, backstage and below stage.
- 5. Provide accessible route to outdoor classroom and TV Studio between the first level and the ground level.
- 6. Replace inaccessible drinking fountains.
- 7. Begin a building-wide, comprehensive signage project.
- 8. Consider providing backup power for elevator and refrigeration to meet emergency shelter needs.
- 9. Consider installing one or more accessible showers to meet emergency shelter needs.

S8 - Winter Hill

Located at the intersection of Medford and Sycamore Streets, the Winter Hill School is a three-story, concrete structure with no off-street staff and public parking spaces provided. The building has entrances on Medford and Sycamore Streets. While these entrances are accessible and an elevator provides vertical circulation to all floor levels, the building has not seen substantial renovation since its construction in the 1960-70's. Toilet rooms for staff and public use are located on each floor but none are accessible. Exterior playgrounds and courts abut the school and are accessed via walkways, stairs and ramps.

Alongside the development of policies and procedures to address a number of the above conditions, given these overall findings, the following distinct projects should be undertaken promptly:

- 1. Either modify or renovate existing multi-user toilet rooms or construct one single-use accessible toilet room on each floor of building. Install signage to direct users to the accessible toilet room.
- 2. Replace curb ramps and sidewalk surfaces;

Long Term

- 1. Consider acquiring evacuation chairs, locate chairs in stairwells.
- 2. Consider installing one or more accessible showers to meet emergency shelter needs.
- 3. Consider providing backup power for elevator and refrigeration to meet emergency shelter needs.

Moderately Accessible

S4 – Edgerly Education Center

Located at Cross Street, the Edgerly Education Center is a three-story brick structure built between Bonair and Otis Streets. This facility houses two separate alternative middle and high schools – Next Wave Middle School and Full Circle High School – on the second and third floors as well portion of the East Somerville Community School on the first and second floors while a new school building is constructed a few blocks away.

Located on a flat site, an at-grade entrance is provided on Bonair Street while multiple other inaccessible entrances can be found along Bonair and Otis Streets. Although a few signs are offered at inaccessible entrances to indicate the direction to the accessible entrance, getting into the building can be extremely confusing.

One accessible parking space is provided in the small parking lot off Otis Street, which is at least 400 feet away from the accessible entrance on Bonair Street. To add to the confusion for those arriving at this facility for the first time, a ramp that leads to an inaccessible entrance is located near the accessible parking space. The Edgerly Education Center has no outdoor recreational space, so activities are held at nearby Foss Park and other recreational areas.

Egress stairways offer vertical circulation to all floor levels. Neither stairway has compliant handrails. An elevator connecting all floor levels is provided in this facility.

The following projects should be undertaken at the Edgerly Education Center:

Short Term

- 1. Re-grade, resurface and re-stripe accessible parking space.
- 2. Replace curb ramps and repair sidewalks.
- 3. Improve exterior signage to indicate the direction to the accessible entrance.
- 4. Modify single-use toilet room on the second floor.
- 5. Either modify or renovate existing multi-user toilet rooms or provide one single-use accessible toilet room on each floor of the building.

- 6. Modify all non-compliant doors (door width, opening force, and hardware). Prioritize entry doors and doors to toilet rooms, classrooms, gym, nurse's office, corridors, and egress stairways.
- 7. Provide an accessible route to the stage inside the gym.

Long Term

- 4. Consider relocating the accessible parking near the accessible entrance.
- 5. Consider acquiring evacuation chairs, locate chairs in stairwells.
- 6. Consider installing one or more accessible showers to meet emergency shelter needs.
- 7. Consider providing backup power for elevator and refrigeration to meet emergency shelter needs.

S5 – Healey

Located at 5 Meacham Street, the Healey School is a 3-story building constructed primarily with brick and concrete masonry units in 2007. The building is designed for kindergarten through Grade 8 and provides activities until 5:30 p.m. The school abuts athletic courts and a playground that were constructed in conjunction with the school. No accessible drop-off is provided but a limited number of public off-street public parking spaces are provided at this facility. An elevator and multiple egress stairways offer vertical circulation to both floor levels. Likewise, given the diverse ages served, single user toilet rooms are found in many classrooms. Toilet rooms for staff are provided on all floors. Toilet rooms for public use are located at the main office and at the cafetorium.

The following projects should be undertaken at the Healey School:

Short Term

- 1. Repair accessible dispensers, stall door hardware and toilets;
- 2. Provide and identify accessible routes to each type of athletic facility and playground as well as provide accessible gates;
- 3. Make minor modifications to existing multi-user toilet rooms:
- 4. Establish policies and procedures to prevent storage of materials in single user toilet rooms;

Long Term

- 1. Re-grade, resurface and re-stripe accessible parking;
- 2. Consider acquiring evacuation chairs, locate chairs in stairwells.
- 3. Consider installing one or more accessible showers to meet emergency shelter needs;
- 4. Consider providing backup power for elevator and refrigeration to meet emergency shelter needs.

S7 – Kennedy

Located at 5 Cherry Street, the Kennedy School is a complex consisting of 3- to 4-story buildings joined together. One building houses a pool that is open to the public most evenings and weekends. The other building contains classrooms, a cafetorium, and gym. The buildings were constructed primarily with brick and concrete masonry units at various times, most recently in the late 1990s. The school is designed for kindergarten through Grade 8 and provides activities until 5:30 p.m. although the pool is open most evenings and weekends. The school also abuts athletic courts and a playground. Located on a hilly site, the building's main entrance and staff-only entrances are at grade, essentially the same as adjacent sidewalks. However, the pool's "after-hours" entrance on Sartwell Avenue is not accessible because it lacks an elevator.

The following projects should be undertaken at the Kennedy School:

Short Term

- 1. Repair accessible dispensers, stall door hardware and toilets;
- 2. Provide and identify accessible route to the pool for after-hours access, implement policies and procedures to guarantee access;
- 3. Modify locker rooms and accessible showers;
- 4. Make minor modifications to existing multi-user toilet rooms;
- 5. Establish policies and procedures to prevent storage of materials in single user toilet rooms;

Long Term

- 1. Establish an additional accessible parking space with signage and access aisle;
- 2. Re-grade, resurface and re-stripe accessible parking at Sartwell Avenue;
- 3. Consider acquiring evacuation chairs, locate chairs in stairwells.
- 4. Consider installing one or more accessible showers to meet emergency shelter needs;
- 5. Consider providing backup power for elevator and refrigeration to meet emergency shelter needs.

Accessible

S1 – Argenziano

Located at 290 Washington Street, the Argenziano School is a 3-story building constructed primarily with brick and concrete masonry units in 2006 and opened in 2007. The building is designed for kindergarten through Grade 8 and provides activities until 5:30 p.m. The school abuts athletic fields and a playground that were constructed in conjunction with the school. No accessible drop-off is provided but a limited number of public off-street parking spaces are provided at this facility.

An elevator and multiple egress stairways offer vertical circulation to both floor levels. Likewise, giving the diverse ages served, single user toilet rooms are found in many classrooms. Toilet rooms for staff are provided on all floors. Toilet rooms for public use are located at the main office and at the cafetorium.

The following projects should be undertaken at the Argenziano School:

Short Term

- 1. Install accessible door hardware on multi-user toilet rooms:
- 2. Provide and identify accessible route to each type of athletic field;
- 3. Make minor modifications to existing multi-user toilet rooms

Long Term

- 1. Re-grade, re-stripe accessible parking;
- 2. Consider acquiring evacuation chairs, locate chairs in stairwells.
- 3. Consider installing one or more accessible showers to meet emergency shelter needs;
- 4. Consider providing backup power for elevator and refrigeration to meet emergency shelter needs.

S3 – Capuano

Located at 150 Glen Street is a 2-story, L-shaped building constructed primarily with brick and concrete masonry units in 2002 and opened in 2003. The building is designed for early childhood education up through kindergarten and provides activities until 5:30 p.m. The school abuts a soccer field and a playground that were constructed in conjunction with the school. As one would expect for a new school, an elevator and multiple egress stairways offer vertical circulation to both floor levels. Likewise, giving the young population served, single user toilet rooms are abundant, generally in each classroom. Toilet rooms for staff are provided on all floors. Toilet rooms for public use are located at the main office and at the cafetorium.

The following projects should be undertaken at the Capuano School:

Short Term

1. Make minor modifications to existing multi-user toilet rooms

Long Term

- 6. Consider acquiring evacuation chairs, locate in at front and rear second floor stairwells.
- 7. Consider installing one or more accessible showers to meet emergency shelter needs;
- 8. Consider providing backup power for elevator and refrigeration to meet emergency shelter needs.

S9 – West Somerville Neighborhood School

Located at 177 Powder House Boulevard, the West Somerville Neighborhood School is a three-story brick structure with two parking lots off Raymond Avenue. The school also abuts athletic courts and a playground. The school is designed for kindergarten through Grade 8 and numerous after-school activities are also offered. The building's main entrance and staff-only entrances are at grade, essentially the same as adjacent sidewalks. Intercoms and security systems are present. Though the school is a designated emergency shelter for Somerville, MEMA, and FEMA use, the school lacks accessible showers for shelter use beyond 48 hours and may require backup power for refrigeration and elevator usage.

Two accessible parking spaces for public and staff use are provided on Raymond Avenue near the accessible entrance on the second floor; however, a sign to identify one of them as a van designated parking space is not provided.

As one would expect for a newer school, an elevator and multiple egress stairways offer vertical circulation to all floor levels. Accessible toilet rooms for staff and student use are provided on all floor levels. Aside from minor issues impacting overall accessibility, sinks inside the science lab and art classroom are not accessible and the lift that leads to the stage inside the cafetorium is obstructed by storage.

The following projects should be undertaken at the West Somerville Neighborhood School:

Short Term

1. Remove furniture from all single-use toilet rooms for faculty use on all floor levels.

- 2. Establish policies and procedures to prevent storage of materials that obstruct the lift and the path to the stage in the cafetorium.
- 3. Provide at least one accessible drinking fountain inside or near the gym.
- 4. Provide at least one accessible sink in the science lab and art classroom.
- 5. Renovate various locker rooms to be accessible.

Long Term

- 1. Consider acquiring evacuation chairs, locate chairs in stairwells.
- 2. Consider installing one or more accessible showers to meet emergency shelter needs;
- 3. Consider providing backup power for elevator and refrigeration to meet emergency shelter needs.

F. Unoccupied Buildings

The City of Somerville owns four unoccupied buildings:

- U1 Prospect Hill Tower
- U2 Tufts Field House

The City also owns the Homans Building in Gilman Square and Powderhouse Community School in Teele Square. Both facilities were identified for evaluation under the original contract; however, once the evaluation started, the City eliminated them because they are either not open to the public or are for sale.

Inaccessible - U1 – Prospect Hill Tower

Prospect Hill Tower is a stone structure built atop Prospect Hill in 1903. Two sets of stone stairways connect the sidewalk along Monroe Street to the base of the tower, which is used as a viewing platform by the public. Due to its historic significance and the low public use, making improvements for accessibility is not advisable.

Moderately Accessible - U2 - Tufts Field House

Tufts Field House, a stone field house built during the Great Depression, is located in the Nathan Tufts / Powderhouse Park. According to the visitor's guide of the park, the Tufts Field House has served many purposes over the years, including as an office for the Draft Board, then for the Traffic and Parking Department, and most recently as a Youth Program center. The building underwent significant repairs and restoration work both inside and outside during 2001-2002, and is now available for public use by petition.

This facility has two entrances facing College Avenue that are accessed via short stairways. At the rear of the building, an at-grade entrance with an automatic door offers an accessible route into the building. No signage directing visitors to the accessible entrance at the rear is provided at the inaccessible entrances.

G. DCR-owned Facilities

The City of Somerville operates three facilities currently owned by the Massachusetts Department of Conservation and Recreation:

- D1 Dilboy Stadium
- D2 Boat House
- D3 Veterans Memorial Rink

Accessible - D1 – Dilboy Stadium

In 2006, a \$7.7 million renovation of Dilboy Stadium transformed this DCR-owned facility into a recreational showpiece. Football, soccer and track teams now compete in the 3,000-seat stadium on an immaculate turf field and an eight-lane international-standard track. Outside the stadium, one swimming

pool, two baseball fields also used for soccer and football, two tennis courts, basketball courts, a playground and two public parking lots run alongside the Alewife Brook Reservation. All facilities within Dilboy Stadium are accessible except for the stadium bleachers. Outside the stadium, the swimming pool is not accessible.

Minimally Accessible - D2 - Boat House

The Boat House is located on the Mystic River Reservation at 32 Shore Drive. The boathouse is a DCR-owned facility that is leased to the Gentle Giant Rowing Club. The Club is a non-profit organization dedicated to introducing and nurturing the sport of rowing, regardless of age, culture, financial ability or physical capability; and to improving and preserving the environment in and surrounding the rivers we row. Gentle Giant Rowing supports the rowing program for Somerville High School that also uses this facility.

Accessible parking spaces are provided at this facility; however, moderate issues along the walkways leading to the entrance were identified. Additionally, no accessible picnic tables were identified on site.

Although the ramp that leads to the public entrance is generally usable by persons with disabilities, it does not meet all of the requirements of applicable accessibility standards. IHCD recommends working with DCR to modify this non-compliant ramp so that the surface and handrail issues are corrected.

Mostly Accessible - D3 – Veterans Memorial Rink

The Veterans Memorial Rink sits in the middle of Conway Park on Somerville Avenue. The City of Somerville took over administration of this DCR-owned ice rink in the fall of 2010, and immediately introduced more public skate times and programs including hockey lessons and league play for both youths and adults. IHCD recommends the following improvements for the Veterans Memorial Rink:

- At all counters for sale or service including ticket sale, skate rental, concessions, etc, –, ensure that a portion of each counter is at least 36 inches wide and no more than 36 inches above the floor. Alternatively, provide an auxiliary counter with a maximum height of 36 inches in close proximity to the main counter, or provide equivalent facilitation. Equivalent facilitation may be provided in the form of a folding shelf attached to the main counter, an auxiliary table nearby, a clipboard made available to the public, or other means;
- Relocate the wall-mounted external automatic defibrillator near the entrance or place a canedetectable barrier underneath it:
- Make modifications to the multi-user toilet rooms;
- Implement a comprehensive signage plan to ensure that accessible signage is provided at all spaces.

H. Parks & Playgrounds

IHCD's contract included the review of 38 parks and playgrounds:

Parks (21):

Bailey

Central Hill

Conway

Edward Leathers Community

Glenn

Grimmons

Hodgkins-Curtin

Kenney

Lexington

Lincoln/Argenziano School

Nathan Tufts / Powderhouse

North Street / Veterans

Nunziato Field

Osgood

Paul Revere

Perry

Seven Hills

Statue

Stone Place

Trum Field

Walnut Street

Playgrounds (17):

Albion

Cummings School

Dickerman

East Somerville School

Florence

Harris

Healy School Community

Hoyt-Sullivan

Kennedy School Community

Marshal Street

Morse-Kelley

Otis

Palmacci

Perkins

Trum

Winter Hill Community School

Woodstock

When viewed in entirety, newer and recently renovated parks and playgrounds are much more accessible and meet most accessibility requirements. Many of these are generally in the neighborhoods of Ten Hills, Spring Hill, and Davis. However, most of the older facilities generally had more substantial barriers. The types of barriers included the following:

- Non-compliant curb ramps and sidewalks;
- Gates lacking smooth surfaces;
- Gate hardware that is inoperable with a closed fist;
- Broken or heaved walkways;
- Inaccessible drinking fountains because of insufficient clear space, knee clearance, uneven surfaces or controls requiring too much force or turning;
- Inaccessible playground play surfaces;
- Accessible play surfaces only connect to one or two play elements or are less than 60" wide;
- Lack of accessible routes connecting elements such as tables, benches, trash cans, BBQ, and each type of athletic facility or play element;
- Eroded or unmaintained surfaces at play structures, benches, or tables;
- Inaccessible picnic tables, chess/checker tables, or benches;
- Protruding objects.

I. Parking Lots

IHCD's contract included the review of 13 parking lots:

- Buena Vista
- Cutter Square
- Day Street
- Foss Park
- Grove Street A
- Grove Street B
- Magoun Square

- Mount Vernon Street
- Prospect Hill
- Union Square
- Veterans Memorial Rink
- Winter Hill A
- Winter Hill B

Rather than describing issues at each parking lot, it is worth noting the following systemic City-wide issues:

- Some lots do not provide accessible parking spaces;
- Where provided, spaces lack access aisles;
- Spaces and access aisles routinely exceed maximum slope requirements (2% slope);
- Van spaces are not identified;
- Signage identifying spaces is generally missing.

Additionally, while not covered by IHCD's contract, IHCD notes with concern the significant lack of onstreet accessible parking in various squares and neighborhoods. It would be advisable for Somerville to note the upcoming Pedestrian Rights of Way requirements of section R214 that state the following:

Where on-street parking is provided on the block perimeter and the parking is marked or metered, accessible parking spaces complying with R309 shall be provided. Where parking pay stations are provided and the parking is not marked, each 6.1 m (20.0 ft) of block perimeter where parking is permitted shall be counted as one parking space. 1 Accessible space for every 25 marked or metered spaces on the block perimeter up to 200 spaces. For 201 spaces and over, the minimum number of accessible spaces shall be 4% of the total on the block perimeter.

Recurring Findings at many Somerville Facilities

- 1. Curb ramps with excessive slopes, broken surfaces, missing detectable warnings, and no level landings;
- 2. Accessible parking with excessive slopes, broken surfaces and missing/too narrow access aisles:
- 3. Exterior ramps with excessive slopes, broken surfaces and no level landings;
- 4. Entrance doors without level landings or latch pull clearance;
- 5. Inaccessible entrance intercoms or with inaccessible signage;
- 6. Locked accessible entrances;
- 7. Accessible Entrances without International Symbol of Accessibility;
- 8. Non-accessible entrances without accessible signage directing to accessible entrance;
- 9. Service counters that are above 36" and or lack required clear space;
- 10. Toilet rooms with improperly mounted grab bars, dispensers, mirrors, and coat hooks;
- 11. Toilet rooms and stalls with inaccessible or broken locks and latches;
- 12. Doors that require excessive opening force;
- 13. Unsecured weather mats and carpets;
- 14. Protruding objects including low hanging/mounted signs and light fixtures, TVs, network/telephone boxes, AED cases, display cases, and fire extinguishers;
- 15. Inaccessible drinking fountains;
- 16. Stair and vertical lifts that do not meet requirements including independent access, weight capacity; platform / door size, clear space for approach and entry, etc.;
- 17. Expired safety certificates for elevators and lifts;
- 18. Designated emergency shelter facilities lack accessible elements such as toilet and shower rooms.

Recurring Recommendations

- 1. Repairing or replacing curb ramps;
- 2. Resurfacing and re-striping of accessible parking;
- 3. Repairing or replacing ramps or handrails;
- 4. Accessible power door openers as an option in lieu of re-grading or doing structural work at entrances or other key spaces;
- 5. Providing accessible intercoms and signage;
- 6. Developing policies and procedures to ensure accessible entrances are unlocked or opened whenever a building is in use;
- 7. Identifying each accessible entrance with International Symbol of Accessibility;
- 8. Providing accessible signage directing to accessible entrance at inaccessible entrances;
- 9. Ensuring that a portion of each counter is at least 36 inches wide and no more than 36 inches above the floor. Alternatively, provide an auxiliary counter with a maximum height of 36 inches in close proximity to the main counter, or provide equivalent facilitation. Equivalent facilitation may be provided in the form of a folding shelf attached to the main counter, an auxiliary table nearby, a clipboard made available to the public, or other means.
- 10. Making minor (non-structural) modifications to toilet rooms including relocating grab bars, dispensers, mirrors, and coat hooks;

- 11. Repair of accessible features including toilet rooms and stalls with inaccessible or broken locks and latches;
- 12. Creating a comprehensive maintenance program and schedule to check and adjust the opening force of all exterior and interior doors. Where not possible, either keep doors open during regular hours or add automatic openers;
- 13. Securing loose weather mats or carpets;
- 14. Removing or locating cane detectable barriers at protruding objects;
- 15. Providing a water cooler with cups on an interim basis until drinking fountains are upgraded;
- 16. Removal of lifts wherever possible and providing accommodations upon request elsewhere until the lift can be replaced with a ramp or elevator;
- 17. Instituting policies and procedures to ensure yearly maintenance and State inspections occur on all elevators and lifts, budget for elevator overhauls and mid-life modernizations;
- 18. Modifying partially accessible elements such as shower rooms or plan for the installation of accessible showers where none are currently provided at designated shelters.

Polling Places

Under both the ADA as well as the Voting Accessibility for the Elderly and Handicapped Act of 1984, polling places across the United States are generally required to be physically accessible to people with disabilities for federal elections. Additionally, Massachusetts' laws also prohibit voter discrimination. In cases of inaccessible polling places, a political subdivision must provide an alternate means of casting a ballot on the day of the election. These laws also require states to make available registration and voting aids for disabled and elderly voters, including information by alternative accessible means. As such, the U.S. Department of Justice (DOJ) as well as the Massachusetts Attorney General's Office have consistently prioritized voting accessibility. See Appendix A of this report for the language that DOJ utilizes in settlement agreements with municipalities and counties as part of its Project Civic Access work.⁸

In addition to the review of City-owned facilities, IHCD surveyed several polling places during the Special Election Primary for U.S. Senate on April 30, 2013. IHCD was able to visit the majority of the polling places, including at least five locations that are not owned by the City:

Ward One

- Precinct 1. A room in the Capuano School.
- Precinct 2. A room in the East Branch Library.
- Precinct 3. A room in the SFD Central Headquarters.

Ward Two

- · Precinct 1. A room in the Public Safety Building.
- Precinct 2. A room in the Argenziano School.
- Precinct 3. Apparatus bay in the SFD Engine 1.

Ward Three

- Precinct 1. Atrium in the High School.
- Precinct 2. A room in the Cummings School.
- Precinct 3. A room in the Dante Club. *

Ward Four

- Precinct 1. A room in the Mystic Activity Center.
- Precinct 2. Apparatus bay in the SFD Central Headquarters.
- Precinct 3. A room in the Winter Hill Community School.

Ward Five

- Precinct 1. A room in the Water Department Building adjacent to DPW.
- Precinct 2. A room in the Brown School.
- Precinct 3. Apparatus bay in the SFD Engine 7.

⁸ http://www.justice.gov/iso/opa/resources/767201359163246439025.PDF

Ward Six

- Precinct 1. A room in the Kennedy School.
- · Precinct 2. A room in the Ciampa Manor. *
- Precinct 3. A room in the Holy Bible Baptist Church. *

Ward Seven

- Precinct 1. A room in the Tufts Administration Building. *
- Precinct 2. Apparatus bay in the SFD Engine 6.
- Precinct 3. The VNA Assisted Living Facility. *
- * Facility that are not owned by the City.

During the brief visits, IHCD reviewed exterior paths of travel leading to entrances from sidewalks and parking (when provided) as well as interior routes. IHCD verified the availability of accessible toilet rooms, tables and voting equipment. While IHCD was not able to test the accessible voting equipment, poll workers volunteered that they had received some or limited training on using the accessible voting equipment.

During the review of polling places, it was discovered that Somerville has previously made some attempts to improve physical access to polling places such as fire stations or facilities that are not owned by the City. Improvements in these facilities range from keeping doors open, temporary signage, and temporary ramps. While these represent some degree of good faith effort, more often than not, the temporary ramps have uneven surfaces, non-compliant handrails, or are too steep. In some instances, such as in the Dante Club, the ramp may only work when the entry door to the building is propped open. This temporary solution obviously may not work during milder weather in November or early spring elections.

Similarly, polling places located in apparatus bay of fire stations may either have temporary ramps or only be accessed via opening apparatus bay doors. Providing access via opening apparatus bay doors during inclement weather would be a discouragement because of opening of bay doors. Further, complicating matters is the driveway slope up to the apparatus bay that can exceed 5% or even 8% such as at the Teele Square fire station. Finally, at Lowell Street fire station, the entrance requires voters to go up and down steps that lack handrails.

Access to polling places in fire stations or facilities that are not owned by the City can also be very problematic because of exterior route conditions, including severe cross and running slopes, broken or heaved walkways, and severely compromised curb ramps. Dante Club and Holy Baptist Church are, perhaps, the worst of the locations followed by various fire stations.

The polling places range in level of accessibility; however, these levels are not meant to be construed or understood as conveying legal interpretation of complete or partial compliance. Rather, for the purpose of this report, IHCD has assigned categories of 'functional accessibility' to each facility for ease of reference:

- PART A Executive Summary
 - Accessible The facility is accessible to a wheeled mobility device user or person with mobility challenges;
 - **Mostly Accessible** A wheeled mobility device user or person with mobility challenges can enter the facility, access the primary function within that facility and access the restroom;
 - Moderately Accessible A wheeled mobility device user or person with mobility challenges
 can enter the facility, access the primary function within that facility;
 - **Minimally Accessible** A wheeled mobility device user or person with mobility challenges can enter the facility;
 - **Inaccessible** A physical barrier exists that would prevent a wheeled mobility device user from entering the facility.

For the sake of simplicity, polling places are organized by their level of accessibility:

Inaccessible

Polling places in this category include:

- Ward Three Precinct 2. A room in the Cummings School.
 Cummings School is an inaccessible building that is pending closure and redevelopment.
- Ward Three Precinct 3. A room in the Dante Club.
 Dante Club has site-wide cross and running slopes (exceeding 10% in certain areas) that impede pedestrian access from adjacent streets and impact accessible parking.
- Ward Six Precinct 3. A room in the Holy Bible Baptist Church.
 Holy Baptist Church has an inaccessible sidewalk (less than 30 inches of width, vertical displacements of 3-4 inches, and cross slopes exceeding 4%).

Additionally, most of these facilities have inaccessible routes from transit, sidewalks or accessible parking. IHCD recommends the relocation of these polling places or that the sites not be utilized as a polling place until all such barriers have been removed.

Moderately Accessible

Polling places in this category include:

- Ward One Precinct 3. A room in the SFD Central Headquarters.
- Ward Two Precinct 3. Apparatus bay in the SFD Engine 1.
- Ward Four Precinct 2. Apparatus bay in the SFD Central Headquarters.
- Ward Four Precinct 3. A room in the Winter Hill Community School.
- Ward Five Precinct 1. A room in the Water Department Building adjacent to DPW.
 DPW Water Building has non-compliant curb ramps, although this facility can be entered though an at-grade entrance.
- Ward Five Precinct 2. A room in the Brown School.
 Brown school has a nominally accessible entrance that is found to be locked. It leads to a non-compliant ramp with excessive slope and blocked by furniture. A partially accessible toilet is offered on the basement level.
- Ward Five Precinct 3. Apparatus bay in the SFD Engine 7.
- Ward Six Precinct 2. A room in the Ciampa Manor.
 Accessible entrance and route are not well marked, furniture obstructions and inaccessible restrooms.
- Ward Seven Precinct 2. Apparatus bay in the SFD Engine 6.

As mentioned previously, the use of fire stations can be problematic for several reasons, including access only through apparatus bays or via steps or non-compliant temporary ramps. While staff generally will open apparatus bay doors for voters using a wheelchair, voters with canes, walkers or non-apparent conditions are not as well accommodated, often struggling through heavy doors, tight corridors, or up steps. IHCD recommends the following improvements at these polling places:

- Replace non-compliant temporary ramps;
- Improve curb ramps and accessible parking at the High School and DPW Water Building;
- · Relocate polling place from Brown School;
- Improve curb ramps and accessible parking at the Police Department and Winter Hill School;
- Improve signage at all entrances of Ciampa Manor;
- If Somerville chooses to continue to utilize fire stations, access must be provided utilizing apparatus bay doors and improved training of poll workers to open doors for voters regardless of whether there is an apparent disability.

Mostly Accessible

Polling places in this category include:

- Ward One Precinct 2. A room in the East Branch Library.
- Ward Two Precinct 1. A room in the Public Safety Building.
 Public Safety Building has accessible route issues leading to building entrances and non-compliant accessible parking. A partially accessible toilet is offered on the first floor.
- Ward Three Precinct 1. Atrium in the High School.
 High School has non-compliant accessible parking and curb ramps adjacent to the gym. A partially accessible toilet is offered near the gym.

IHCD recommends the improvement of the parking and toilet rooms at these polling places.

Accessible

Polling places in this category include:

- Ward One Precinct 1. A room in the Capuano School.
- Ward Two Precinct 2. A room in the Argenziano School.
- Ward Four Precinct 1. A room in the Mystic Activity Center.
- Ward 6 Precinct 1. A room in the Kennedy School.
- Ward 7 Precinct 1. A room in the Tufts Administration Building.
- Ward 7 Precinct 3. The VNA Assisted Living Facility.

IHCD recommends the use of these polling places, as well as relocation of inaccessible polling places into these facilities.

Overall Recommendations:

- Post clear and frequent signage identifying accessible routes and accessible parking at each polling place;
- Provide accessibility and accommodation information on website and any election related communication.

Sample DOJ Polling Places Language

As reference for the pertinent City staff, this is the language concerning Polling Places utilized by the Department of Justice (DOJ) in Project Civic Access agreements:

POLLING PLACES

- Some of the County or Municipal polling places may be owned or operated by other public entities subject to title II or by public accommodations subject to title III and, as such, would be subject to the obligation to provide program access or to remove barriers to accessibility under the ADA. This Agreement does not limit future enforcement action against the owners or operators of these polling places by any person or entity, including the Department.
- 2. Before designating any site as a new polling place, the County or Municipality will survey the site using the survey instrument at Attachment F to determine whether the site contains barriers to access by people with disabilities in the parking, exterior route to the entrance, entrance, interior route to the voting area, or voting area. The County or Municipality will not designate any such site as a polling place until all such barriers have been removed.
- 3. The Department surveyed certain of County or Municipal's polling places. Barriers to access at such polling places owned by the County or Municipality and the dates by which the County or Municipality will remove barriers are noted in Attachments I, J, and K.
- 4. Barriers to access at the polling places not owned by the County or Municipality which were surveyed by the Department are noted in Attachment E. Within one (1) month of the effective date of this Agreement, the County or Municipality will request in writing that each of the owners and operators of the polling places listed in Attachment E remove the noted barriers to access for persons with disabilities within one (1) year of the effective date of this Agreement. The County or Municipality will provide a copy of the Department's ADA Checklist for Polling Places (www.ada.gov/votingck.htm) with the written request. The County or Municipality will simultaneously send a courtesy copy of the request to the Department.
- 5. Within nine (9) months of the effective date of this Agreement, the County or Municipality will survey all facilities listed in Attachment E to determine whether the barriers noted have been removed. If not, for each polling place that still contains inaccessible parking, exterior route to the entrance, entrance, interior route to the voting area, or voting area, the County or Municipality will identify within eighteen (18) months of the effective date of this Agreement an alternate location where these elements are accessible. That identification will utilize the survey instrument that appears as Attachment F to this Agreement. The County or Municipality will then take immediate steps to change its polling place to the new location. Under this provision of the Agreement, the County or Municipality will ensure that barriers at each polling place identified in Attachment E are either removed or a substitute accessible polling place is in operation before the next election occurring more than twelve (12) months after the effective date of this Agreement.

- 6. Within twelve (12) months of the effective date of this Agreement, using the survey instrument at Attachment F, the County or Municipality will survey all polling places not surveyed by the Department to identify barriers to access by people with disabilities in the parking, exterior route to the entrance, entrance, interior route to the voting area, and voting area. For each such polling place, the County or Municipality will then either (1) ensure that all barriers to access by people with disabilities have been removed or (2) identify an alternate polling place with no barriers to access by people with disabilities. That identification of accessible polling places will utilize the survey instrument that appears as Attachment F to this Agreement. The County or Municipality will then take immediate steps to change each new inaccessible polling place to a new accessible location. Under this provision of the Agreement, the County or Municipality will ensure that barriers at each polling place the Department did not survey are either removed or a substitute accessible polling place is in operation before the next election occurring more than twelve (12) months after the effective date of this Agreement.
- 7. Until all polling places in each precinct or voting district have accessible parking, exterior routes, entrances, interior routes to the voting area, and voting area, prior to each election, the County or Municipality will identify and widely publicize to the public and to persons with disabilities and organizations serving them the most accessible polling place(s) for each precinct or voting district.
- 8. Within three (3) months of the effective date of this Agreement, the County or Municipality will provide opportunities for same-day balloting for voters with disabilities whose assigned polling place does not have accessible parking, exterior route to entrance, entrance, interior route to the voting area, and voting area. The method for providing these opportunities may include allowing the individual to vote at another nearby location that is accessible, allowing individuals with disabilities to vote by an absentee ballot that is accepted if postmarked on the day of the election (or picked up by election officials at the home of the voter on the same day as the election), providing curbside voting at the inaccessible polling place, or any other method that ensures that voters with disabilities have the same degree of information available to them when casting their ballots as others. If curbside assistance is provided and a polling place official is not stationed outside to provide assistance to people with disabilities in curbside voting, it must include a reliable, effective mechanism by which individuals with disabilities can summon election officials to provide curbside assistance without leaving their vehicles and ensure prompt response and assistance with curbside voting from polling officials.
- 9. Within three (3) months of the effective date of this Agreement, the County or Municipality will survey its voter registration locations for accessibility to persons with disabilities by using the form provided at Attachment F and will report the results of this survey to the Department. If barriers to access are identified, the County or Municipality will implement and report to the Department its plan to provide program access, which may include allowing persons to register to vote through alternative means or at alternative locations.
- 10. Within three (3) months of the effective date of this Agreement, the County or Municipality will make all voter registration materials available in alternate formats, including Braille, large print, audio tape, and accessible electronic format (e.g., HTML).

PART A – Executive Summary

11. Within the month prior to the next election that utilizes the County or Municipality's polling places, and at yearly anniversaries of the effective date of this Agreement until it expires, the County or Municipality will train poll workers on the rights of people with disabilities and the practical aspects of assuring those rights. The training will cover, at minimum, the need to maintain the physical accessibility of polling locations; how to assist people with disabilities, as necessary; and how to operate any non-standard voting equipment or accessible features of standard equipment (particularly new, accessible equipment).

Legal Overview

The City of Somerville is obligated by both Federal and State laws and codes concerning the rights of people with disabilities in the daily provision of programs, services, and activities. Appendix A at the end of this report provides a comprehensive list of these laws, as well as greater detail about each.

Federal Obligations:

The American with Disabilities Act (ADA)

The ADA is a broad federal civil rights law that is intended to ensure equal opportunity for people with disabilities. Since the City of Somerville is a local government, it is considered a "public entity," and its primary obligation is to ensure equal access to its programs, services, and activities under Title II of the ADA.

The following are the relevant requirements of Title II of the ADA:

Application: Requirements apply to areas used by employees and to areas used by the public.

Alterations: Each part of a facility altered that affects usability must, to the maximum extent feasible, be altered to be accessible. The standard for new construction must be applied to each element being altered.

Technical Infeasibility: Application of the ADA Standards is not required where it would be "technically infeasible". Technical infeasibility is defined as having little likelihood of being accomplished because existing structural conditions would require removing or altering a load-bearing member which is an essential part of the structural frame; or because other existing physical or site constraints prohibit modification or addition of elements, spaces, or features which are in full and strict compliance with the minimum requirements for new construction and which are necessary to provide accessibility. If compliance is technically infeasible, the alteration must provide accessibility to the maximum extent feasible.

Additional alteration requirements: Under the ADA Standards, alterations to primary function areas (areas where major activities take place) trigger a "path of travel" requirement – that is, a requirement to make accessible the path of travel from the entrance to the altered area plus the telephones, restrooms, and drinking fountains serving the altered area. A public entity is not required to spend more than 20% of the cost of the alteration on making the path of travel accessible.

Variances: There is no procedure for seeking variances under the ADA.

Title II has requirements for inaccessible buildings constructed before the ADA went into effect. The requirements in the two titles are different.

The following applies to state and local governments under Title II:

Program accessibility: The focus is on ensuring that each service, program, and activity, when viewed in its entirety, is readily accessible to and usable by people with disabilities. Buildings constructed before the ADA went effect are not required to be fully accessible.

Program accessibility methods: These can include the redesign of equipment, reassignment of services to accessible buildings, assignment of aides (e.g. human beings), home visits, delivery of services at alternate accessible sites, alteration of existing facilities, and construction of new facilities.

Section 504 of the Rehabilitation Act

The Rehabilitation Act prohibits discrimination on the basis of disability in programs conducted by Federal agencies, in programs receiving Federal financial assistance, in Federal employment, and in the employment practices of Federal contractors. The standards for determining employment discrimination under the Rehabilitation Act are the same as those used in title I of the Americans with Disabilities Act. Though often the same as responsibilities under Title II of the ADA and a primary responsibility for program access, Section 504 compliance still applies.

State Obligations:

Massachusetts Constitutional Amendment - Article 114

The Massachusetts Constitution states:

"No otherwise qualified handicapped individual shall, solely by reason of his handicap, be excluded from participation in, be denied the benefits of, or be subject to discrimination under any program or activity within the Commonwealth."

Article 114 is written broadly. It prohibits discrimination based on disability on any level within the state, not just for recipients of state or federal funds. For example, town meetings must be held in an accessible place with sign language interpreters provided if needed, and a small grocery store or a privately owned dinner theater cannot refuse to do business with an individual based on the person's disability.

Massachusetts Architectural Access Board - M.G.L. c. 22, § 13A

The Architectural Access Board (AAB) is a regulatory agency whose mandate is to develop and enforce regulations designed to make public buildings accessible to, functional for and safe for use by persons with disabilities. See 521 C.M.R. In addition to writing regulations, the Board decides on variance requests, provides training on its regulations, issues advisory opinions and makes decisions on complaints. Local building inspectors are responsible for enforcing the regulations which are a specialized section of the Massachusetts Building Code. See 780 C.M.R.

The construction, reconstruction, remodeling, alteration, or change of use of a building or facility that is open to the public triggers the authority of the AAB. New construction must fully comply. For renovation, remodeling, or alteration:

• The work being done must comply with the regulations.

- If the work done in any 36-month period is greater than \$100,000, the "work being performed" is required to comply. In addition, an accessible entrance and an accessible toilet room, telephone and drinking fountain (if toilets, telephones and drinking fountains are provided) shall also be provided.
- If the work done in a 36-month period is more than 30% of the "full and fair cash value" of the building, the entire building must come into compliance.

Enforcement: Anyone can file a complaint with the Board. The Board has the authority to issue variances and/or impose fines of up to \$1000 per violation per day of noncompliance with its order.

Reference List of Relevant Laws and Executive Orders

Federal Laws:

- 1. American with Disabilities Act (ADA)*
- 2. Section 504 of the Rehabilitation Act*
- 3. Fair Housing Act
- 4. Voting Accessibility for the Elderly and Handicapped Act
- 5. National Voter Registration Act
- 6. Civil Rights of Institutionalized Persons Act
- 7. Individuals with Disabilities Education Act

Commonwealth of Massachusetts Laws and Executive Orders:

- 1. Massachusetts Constitutional Amendment Article 114
- 2. Massachusetts Equal Rights Law G.L. c. 93 § 103
- 3. Massachusetts Executive Order 526 EO 526
- 4. Massachusetts Architectural Access Board G.L. c. 22, § 13A
- 5. Massachusetts Secretary of State, Election Division Regulations 950 C.M.R. §51
- 6. Massachusetts Zoning Law, Access Ramps G.L. c. 40A § 3 ¶8
- 7. Massachusetts Zoning Law, General and Community Residences G.L. c. 40A § 3 ¶4
- 8. Massachusetts Disability Commissions G.L. c. 40, § 8J
- 9. Handicapped Parking Laws Parking Lots: G.L. c. 40 § 21, ¶ 23: Parking Meter Fees G.L. c. 40 § 22A; Over Time Parking Limits G.L. c. 40 §22; Reserved Spaces and Towing G.L. c. 40 §22D:
- 10. Administration of Handicapped Parking Program G.L. c. 40, § 22G
- 11. Massachusetts Automobile Excise Tax Exemption G.L. c. 60A, § I
- 12. Massachusetts Automobile Sales Tax Exemption G.L. c. 64H, § 6(U)
- 13. Massachusetts Public Education Law, Ch. 766 G.L. c. 71B, §§ 1 14
- 14. Massachusetts Transitional Planning Services, Turning 22 (Commonly Known as Chapter 688) G.L. c. 71 B, §§ 12A C
- 15. Massachusetts Employment Discrimination Law G.L. c. 151B, 4, ¶ 16

^{*} Requires a Transition Plan



PART B

Evaluation of Non-discriminatory Policies & Practices in Programs, Services & Activities



Introduction

In an effort to provide and maintain compliance with the ADA, the City of Somerville contracted with the Institute for Human Centered Design (IHCD) to undertake a comprehensive assessment of its policies, practices and procedures as well as its facilities to determine compliance with the requirements of the Americans with Disabilities Act and the Massachusetts Architectural Access Board. The review and recommendations provided in this assessment also go beyond strict compliance assessment to recommend enhancements to current conditions that would result in a more usable, inclusive and welcoming environment for members of the Somerville community.

Information about corrective action will include citations of the Title II of the ADA as well as recommended 'best practices' for each aspect that requires action.

The assessment included policies, practices and procedures relative to employment and nondiscrimination in policies, practices and procedures for all of the City's programs, services and activities including those related to effective communication.

Corrective action is needed in policies and procedures to create written policies that would ensure the City of Somerville's compliance with applicable laws. In addition, the City may wish to consider making a commitment to a more accessible website. Choosing to make the website accessible would make it available to site visitors who use assistive technology such as screen readers. The website is also a valuable asset in communicating the City's commitment to equal opportunity for people with disabilities through a clear statement and contact information for the ADA Coordinator. It can also provide a helpful opportunity to share information about accessible routes to reaching the City's programs and activities including meetings.

This report summarizes IHCD's findings of Title II of the ADA compliance. The information pertinent to this assessment was obtained by a written survey submitted by key staff from the City of Somerville and constitutes the basis for this compliance assessment report. From the written survey it is clear that the City understand its obligations under Title II of the ADA but additional steps are necessary to ensure that people with disabilities enjoy the same opportunities to participate in its programs, services and activities as Somerville residents without disabilities.

Analysis

Title II of the ADA prohibits discrimination on the basis of disability. Specifically, Title II requires that:

No qualified individual with a disability shall, on the basis of disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity (35 CFR Part 35.130 (a)).

This report is divided into sections where these requirements apply. Each section includes the applicable citation from Title II of the ADA, IHCD's summary of findings - after reviewing answers from survey - and IHCD's recommendations for the City of Somerville to implement.

I - Designation of Responsible Employee

Title II of the ADA makes clear that a public entity must designate a responsible employee and adopt grievance processes.

Designation of Responsible Employee: A public entity that employs 50 or more persons shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under this part, including any investigation of any complaint communicated to it alleging its noncompliance with this part or alleging any actions that would be prohibited by this part. The public entity shall make available to all interested individuals the name, office address, and telephone number of the employee or employees designated pursuant to this paragraph. (35 CFR Part 35.107 (a))

Title II provides little specific guidance for implementing this requirement but the primary role of the designated employee, also called the ADA Coordinator, is making sure that the City is in compliance with the requirements.

Finding

The City of Somerville has met its obligation to designate a responsible employee by appointing Ms. Betsy Allen to the position of Director and ADA Coordinator. The choice of a person with appropriate experience and training and the authority to solve problems is a good choice in keeping with a pattern of expectation of compliance as discerned through the Department of Justice ADA Settlement Agreements. However, the City's employees do not seem to know who the ADA Coordinator is.

Recommendations

The City should consider clarifying for its entire community and employees the name and scope of responsibilities of the ADA Coordinator. Doing so will improve compliance and make more efficient operations with respect to the needs of members of the public with disabilities.

Furthermore, clarification on the ADA Coordinator will:

- Make it easier for the City to be proactive in meeting the needs of members of the public with disabilities;
- Help the City develop and articulate a clear vision and mission with regard to members of the public with disabilities;
- Reduce confusion and improve the City's day-to-day operations with respect to members of the public with disabilities;
- Permit employees to respond more quickly to needs as they arise because they have a primary contact for addressing these needs;
- Build in-house expertise and capacity;

• Prevent confusion and help ensure that candidates for employment, employees and the public have a clear understanding of their responsibilities and rights under the ADA.

II - Complaint Procedures

Title II of the ADA requires a public entity to adopt an adequate grievance processes.

Complaint Procedure: A public entity that employs 50 or more persons shall adopt and publish grievance procedures providing for prompt and equitable resolution of complaints alleging any action that would be prohibited by this part. (35 CFR Part 35.107 (b))

Finding

From the survey's responses, it seems that some City departments are not aware of their ADA obligation to provide grievance procedures and other departments refer to the City's grievance procedure. It is not clear if the City has a policy or method of dissemination to meet its obligations under Title II that requires appropriate due process and prompt and equitable resolution of complaints alleging any discrimination for members of the public as is defined in the regulations (35 CFR Part 107 (b)).

Recommendations

- The City should take steps to clarify its grievance processes regarding members of the public.
 IHCD recommends that grievance procedure include the following components:
 - A detailed description of the procedures for submitting a grievance;
 - A two-step review process that allows for appeal;
 - Reasonable time frames for review and resolution of the grievance;
 - Good record-keeping for all complaints submitted and documentation for steps taken towards resolution;
 - The name, office address, telephone number and email of the designated employee to whom the complaint should be sent.
- Ensure the City's employees are aware of the grievance procedure and can provide information about the process when appropriate.
- Provide the grievance procedure form on the City's website and state the commitment to provide copies in alternate formats upon request.

(See attachment)

III - Notice

Title II of the ADA requires that public entities notify participants of its non-discrimination policies:

A public entity shall make available to applicants, participants, beneficiaries, and other interested persons information regarding the provisions of this part and its applicability to the services, programs, or activities of the public entity, and make such information available to them in such manner as the head of the entity finds necessary to apprise such persons of the protections against discrimination assured them by the Act and this part. (35 CFR Part 35.106)

Findings

It appears from the survey submitted by staff that the City of Somerville does not have a uniform policy regarding the posting of ADA notices in its facilities. Some City departments reported that notices are not posted. Other departments reported that notices are posted in employee-only areas. In building surveys, it was rare to find the postings.

Also from answers provided in the written survey, IHCD found no statement about the obligation to provide notification of non-discrimination policies relative to people with disabilities in materials disseminated to members of the public.

Recommendations

The City should revise its Notice of non-discrimination policy to comply with Title II that states that public entities shall take initial steps to notify program/service participants, beneficiaries and employees of its obligations; and identify its ADA Coordinator by:

- Publishing the Notice in all the materials distributed by the City; post the Notice on the City's
 website home page and Somerville Schools' website; and post copies in noticeable locations in
 the City's public buildings.
- Including the ADA Coordinator's name, address, telephone number and email address on the Notice. The City may meet these requirements by including appropriate inserts in existing materials and publications that contain general information disseminated to staff and members of the public. (See attachment)

IV - Reasonable Modification of Policies Practices and Procedures

Title II of the ADA requires state and local governments to modify its policies when necessary to avoid discrimination:

A public entity shall make reasonable modifications in policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability, unless the public entity can demonstrate that making the modifications would fundamentally alter the nature of the service, program, or activity. (35 CFR Part 32.130 (b)(7)).

Finding

The City needs to develop policies to address the current 'no animals allowed' policy in the City's parks.

Recommendation

 The City should adopt policies, practices and procedures for responding to request for modifications by members of the public with disabilities.

V - Employment and Reasonable Accommodation

Title II of the ADA prohibits discrimination on employment on the basis of disability:

No qualified individual with a disability shall, on the basis of disability, be subjected to discrimination in employment under any service, program, or activity conducted by a public entity. (35 CFR Part 35.140 (a)).

This requires that Title II entities make reasonable accommodation to qualified employees with disabilities. Reasonable accommodation may include modifying work schedules, job restructuring, and making facilities used by employees readily accessible to employees with a disability. Note that the requirements of Title I of the ADA, as established by the regulations of the Equal Employment Opportunity Commission in 29 CFR Part 1630, apply to employment in any service, program, or activity conducted by a public entity if that public entity is also subject to the jurisdiction of title I. (35 CFR Part 35.140 (b)(1)).

Finding

From the policies listed on the City's website and responses from the survey, there is no evidence that the City has failed to provide reasonable accommodation to its employees.

Some departments refer to the City's policies; other departments reported that they don't have any policy in place but 'they are willing to work with staff to help their personnel get back to work'. It's not clear if staff knows the process for requesting reasonable accommodations.

There is not a clear statement on the City's obligation to provide reasonable accommodation under Title I of the ADA in all aspects of employment in the personnel policies.

Recommendations

- We recommend complying with the requirement of reasonable accommodation by including appropriate inserts in materials and publications that contain general information disseminated to City's staff.
- Having a section in the City's personnel policies on employees with disabilities rights regarding reasonable accommodation under the ADA. That could be done by having a paragraph on the personnel policies that states:

The City of Somerville is committed to the fair and equal employment of people with disabilities. Reasonable accommodation is the key to this non-discrimination policy. While many individuals with disabilities can work without accommodation, other qualified applicants and employees face barriers to employment without the accommodation process. It is the policy of the City of Somerville to reasonably accommodate qualified individuals with disabilities unless the accommodation would impose an undue hardship. In accordance with the Americans with Disabilities Act, reasonable accommodations will be provided to qualified individuals with disabilities when such accommodations are

directly related to performing the essential functions of a job, competing for a job, or to enjoy equal benefits and privileges of employment.

 Update the complaint form on the City's website to reflect the current ADA Coordinator and include email on the grievance procedure. Also make sure that the form is in an accessible format.

<u>Suggestion</u>: The national Job Accommodation Network is the most comprehensive, practical resource for understanding the job accommodation process: http://www.askjan.org

VI - Auxiliary Aids and Services

Title II entities are required to provide appropriate auxiliary aids and services to ensure effective communication with people with disabilities. This obligation applies to all members of the public with disabilities including job applicants, program participants and people who are seeking information about the City's programs, services or activities. Specifically Title II requires that:

A public entity shall take appropriate steps to ensure that communications with applicants, participants, members of the public, and companions with disabilities are as effective as communications with others. (35 CFR Part 35.160 (a)).

Auxiliary aids and services are devices or services that enable effective communication for people with disabilities. The type of auxiliary aid or service necessary to ensure effective communication will vary in accordance with the length and complexity of the communication involved (e.g., a query at an information desk in City Hall, a meeting, a job description).

The obligation to communicate effectively with people who have disabilities applies to the presentation and exchange of information in all forms including sound, print, graphics and voice.

Furthermore, this requirement may include providing sign language interpreters, telephone handset amplifiers, telecommunication devices for Deaf persons (TDD's), note takers, written materials for persons who are Deaf or hard of hearing or transcripts, Braille, digital or audio information for persons who are blind or have difficulty seeing.

The decision about what auxiliary aid is appropriate should evolve from a consultation between the Title II entity (City of Somerville) and individuals with disabilities wherever possible to ensure effective communication. In many cases, more than one type of auxiliary aid or service may make effective communication possible. While consultation is strongly encouraged, the public entity shall give primary consideration to the requests of individuals with disabilities. The Effective Communication obligation does not require a public entity to take any action that would result in a fundamental alteration in the nature of its services, programs or activities or impose an undue financial and administrative burden.

Finding

It seems that the City does not have specific policies or procedures for employees to provide auxiliary aids and services, but there is also no evidence that they have failed to provide sign language interpreters when required. It was mentioned by staff that they 'take the time required to assist who goes to them for assistance'. It was also mentioned that sometimes staff asks family members for assistance.

Finally, it is not clear if the information available in print format is currently available in alternate electronic formats or on the website.

Recommendations

Although there were no complaints (if there were any) shared with IHCD, the City should consider developing and publicizing clear processes for members of the public and employees to request auxiliary aids and services:

- The effective communication notice should be distributed to all department heads; published in a local newspaper of general circulation serving the City; in all materials regarding the City's programs, services or activities and on the City's website home page. Copies should also be posted in prominent locations in the City's public buildings.
- Staff should clearly understand the responsibility to provide auxiliary aids and services and the process for requesting them when needed.
- Staff needs to understand the scheduling time necessary in requesting a sign language interpreter through the Mass. Commission for the Deaf and Hard-of-Hearing.
- Members of the public need to have a clear understanding of the process for requesting
 auxiliary aids and services and the time period in which a request must be made if it involves
 ASL interpreters or special equipment such as assistive listening devices that may need to be
 rented. This information should be included in the general information for the public as well as
 on the City's website. (see attachment 1)
- Staff needs to understand that they should not rely on a family member or an adult accompanying the person with a disability to interpret or facilitate communication (35 CFR Part 35.153 (c)).
- The City should ensure that information and resources at each department interacting with the
 public are available in alternate format. That could be done by having a large print sign at each
 department stating:

"All of our materials are available, upon request, in alternate format such as audio, large print or Braille."

- The City should ensure that staff interacting with the public is fully trained on how to respond to TTY and relay calls for telephone communications with people who are deaf, have difficulty hearing or have speech disabilities.
- Ensure that the City's website and other web-based services are accessible to people with disabilities.
- Ideally, the City will develop a system for training staff to meet these responsibilities especially
 knowing the processes for securing Braille, making large print, other types of alternate formats,
 understanding how to request interpreters or CART and the length of time needed and how to

use the assistive listening systems and other special devices to assist people with disabilities to enjoy effective communication.

Additionally, under Title II of the ADA, emergency programs, services and activities must be accessible to people with disabilities.

- Ensure that the City takes the necessary steps to effectively communicate with people with disabilities (ADA Tool kit: Emergency Management from Department of Justice http://www.ada.gov/pcatoolkit/chap7emergencymgmt.pdf) and FEMA Guidance on Planning for Integration of Functional Needs Support Services in General Population Shelters (http://www.fema.gov/pdf/about/odic/fnss_guidance.pdf).
- Make the emergency plan available on the City's website and update the emergency procedure as often as is necessary.

VII - Emergency Preparedness, Evacuation Plans, and Emergency Shelters

As evidenced by recent Project Civic Access settlement agreements, the Department of Justice views emergency preparedness, shelters and evacuation plans as critical components of a municipality's responsibilities related to accessibility. While a full review of Somerville's emergency preparedness, evacuation plans and emergency shelters was not part of this RFP, based on prior emergency shelter evaluation work and surveys of Somerville's physical facilities, the following general findings are worth noting.

Finding

- Multi-story buildings did not regularly post up-to-date floor plans;
- Information about evacuating people unable to navigate stairs was notably absent;
- Schools and other facilities built after 1991 lacked designated Areas of Rescue Assistance (ADAAG 4.3.11) and accessible means of two way communication;

Elements not yet required by code:

- Schools and other large buildings do not have evacuation chairs;
- Designated MEMA and FEMA shelters such as schools may lack backup power for elevators and refrigeration;
- Designated MEMA and FEMA shelters such as most schools lack showers and locker rooms.

Recommendations

1. Conspicuously post up-to-date floor plans;

- 2. Post information about evacuating people unable to navigate stairs;
- 3. Develop evacuation plans for each facility;
- 4. In facilities built or altered after 1991, provide designated Areas of Rescue Assistance (ADAAG 4.3.11) and accessible means of two way communication; in facilities built or alter after 3/15//2012, provide Areas of Refuge in accordance with IBC 2003 or newer;

¹ For example, see sections G & H of Fort Morgan Colorado DOJ PCA agreement: http://www.ada.gov/fort-morgan-pca/fort-morgan-pca-sa.htm

5. As MEMA/FEMA Functional Needs Support Services (F.N.S.S.) plans are developed or revised, adopt policies to ensure that community evacuation plans enable people with disabilities, including those who have mobility, vision, hearing, or cognitive disabilities, mental illness, or chronic health conditions, to safely self-evacuate or to be evacuated by others. Until all emergency shelters have accessible parking, exterior routes, entrances, interior routes to the shelter area, and accessible toilet rooms serving the shelter area, identify and widely publicize to the public, including persons with disabilities and the organizations that serve them, the locations of the most accessible emergency shelters. For more information see US DOJ's Making Community Emergency Preparedness and Response Programs Accessible to People with Disabilities - http://www.ada.gov/emergencyprepguide.htm, ADA Tool kit: Emergency Management from Department of Justice -

http://www.ada.gov/pcatoolkit/chap7emergencymgmt.pdf and FEMA Guidance on Planning for Integration of Functional Needs Support Services in General Population Shelters - http://www.fema.gov/pdf/about/odic/fnss_guidance.pdf

Additionally, we recommend considering, in partnership with MEMA and FEMA:

- 1. Engaging the National Fire Protect Association (NFPA) for evacuation training, guidance on evacuation chairs and their location in each facility;
- 2. Acquiring evacuation chairs and locating in stairwells;
- 3. Providing and load verifying backup power source for elevator to address F.N.S.S. emergency shelter needs;
- 4. Installing one or more accessible showers to meet emergency shelter needs;
- 5. Providing backup power for refrigeration to meet emergency shelter needs.

VIII - Maintenance of Accessible Features (ADA Title II – 28 CFR Part 35.133(a))

Title II requires accessible facilities and equipment to be maintained such that they are readily accessible to and usable by persons with disabilities. Examples of facilities and equipment include electronic and physical accessibility features accessible parking, sidewalks (including snow removal and temporary routes during construction), APS, curb ramps, ramps, elevators, lifts, power door openers, locks, dispensers, drinking fountains, assistive listening equipment, TTD/TTYs, etc.

Finding

Based on reports from Somerville staff and reviews of facilities, maintenance of many accessible features is needed however it is unclear how the City evaluates or prioritizes maintenance requests related to accessibility.

Recommendations

- We recommend developing and or modifying building, department, and city-wide policies to ensure accessible features are maintained and prioritized appropriately.
- We recommend adopting a snow removal and temporary pedestrian routes policy and suggest that the City of Cambridge and MassDOT have good models to work from.

Somerville Public Schools

Title II of the ADA requires that all programs, activities and services of the City's Public Schools be in compliance with the non-discrimination requirements of the ADA (280 CFR Part 35.102). The City's Public Schools must ensure that students with disabilities are not excluded from participation in or denied the benefits of its services.

The ADA also requires making reasonable modifications to policies, practices, and procedures when necessary to avoid discrimination against a person with a disability and taking the steps necessary to ensure effective communication with people with disabilities.

The information pertinent to the assessment of the Somerville's Public Schools was obtained by a written survey submitted by the City's Public Schools and direct review of materials from the City's Public School's website.

IHCD's review indicated that the City's Public Schools are mostly in compliance with Section 504 and the Title II of the ADA and that there is a commitment to inclusion of students with disabilities that is affirmed by the extensive infrastructure of policies and procedures the City's Public Schools has on its website. However, as noted in the facility surveys as well as the 2011 US Department of Education's Letter of Findings, there are barriers to fully participating in all programs and activities. Examples of these barriers include:

- Lack of accessible intercoms and signage at entrances (All)
- Lack of accessible routes and vertical access (Brown)
- Lack of accessible toilet rooms (Brown, Winter Hill, High School)
- Lack of accessible lockers, locker rooms and showers (Capuano, Edgerly, High School and Kennedy)
- Lack of accessible specialized spaces or furniture for spaces such as computer labs, each type of science lab, shops, and foreign language labs (All)
- Lack of access to raised stages (Edgerly, Kennedy, High School)

To the extent that school policies and procedures can be altered or developed to mitigate these barriers in the short term while physical alterations are designed and built, Somerville ought to do so. Further, the recommendations below are intended to help the City's Public Schools improve compliance and public access for the benefits of the Schools' students, staff and visitors with disabilities to ensure that people with disabilities enjoy the same opportunities to participate in the City's Public School programs, services and activities as everyone else.

Recommendations

- Ensure that the complete contact information –including name, title and email of the person responsible of handling grievance procedures and/or modifications of policies is included in any material distributed to students, parents and members of the public.
- Ensure that the City's Public Schools' non-discrimination *Notice* is available in the Public Schools' home page of the website, materials distributed to the public and in all Public Schools facilities.

- Ensure that the information provided in a written format is also available on an electronic format for parents and members of the public who are blind or have difficulty seeing. Also ensure that the information is posted in all the Public Schools facilities. Stipulate the commitment to Effective Communication and be specific as to whom to send the request to, what options there are for making a request, and in what timeframe. Sample of Effective Communication request:
 - Somerville Public Schools is committed to the full participation of people with disabilities. Any person with a disability who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in the school's programs, services, activities and committee meetings, should contact the office of the Superintendent and/or the District Coordinator (Name, Address, Phone number and email) as soon as possible but no later than 48 hours before the scheduled event.
- Review the Somerville School District Regulations found in the department's website and replace the terms 'handicap/disable/mental retardation' with 'disability'.
- Review the Somerville School District Regulations found in the department's website and include the language of the ADA Amendments Act passed in 2008 regarding the definition of major life activities.
- If the City's Public Schools have an Emergency Evacuations and Disaster Plans make sure to involve people of the disability commission to guarantee safe and self-inclusion of students, staff and visitors with disabilities. Or ensure that the plan is in place when developed.
- If the City's Public Schools have Evacuation Procedures, guarantee that communication with students with disabilities is as effective as communication with any student. Furthermore, make the evacuation procedure available on the School District website and update the evacuation procedure as often as is necessary.

Resource List

Department of Justice:

- Americans with Disabilities Act Title II Regulations: http://www.ada.gov/regs2010/titleII 2010/titleII 2010 regulations.htm
- ADA Tool kit: Emergency Management from Department of Justice: http://www.ada.gov/pcatoolkit/chap7emergencymgmt.pdf

Job Accommodation Network:

http://www.askjan.org



PART C

Evaluation of Website



Introduction

The Institute for Human Centered Design (IHCD) conducted a review of the *somervillema.gov* website in order to help identify any significant and recurring accessibility and usability problems. The basis for the review was the guidance from Section 508 of the Rehabilitation Act, the W3C-WAI's WCAG 2.0 and IHCD's expertise in universal or inclusive design. IHCD's review looked at central functions, key pages and navigation through the site.

Objectives

The objective of this website review was to learn how the experience for the *somervillema.gov* website could be improved for all users, but in particular for users that experience functional limitations such as low/no vision, hearing impairments, cognitive limitations and dexterity or other physical limitations.

Method of Evaluation

IHCD's primary research method is participatory research. This method focuses particularly on the engagement of 'user/experts,' people with functional differences that vary from the norm who experience every day how design fails and who can help to provide guidance on solutions (Ostroff, 1997). The evaluation procedure for the website involved using a variety of assistive-technology tools and methods such as screen readers, screen magnifiers, engaging with a variety of 'user/experts' and conducting an expert review. Additionally, the site was reviewed on a variety of platforms, different browsers and operating systems.

IHCD used a mix of methods to evaluate the website including:

- The use of the following automated Evaluation and validation tools: A checker, Cynthia Says,
 Functional Accessibility Evaluator, TAW, W3C CSS Validator, W3C Link Checker, W3C Markup
 Validation, WAVE Accessibility Toolbar
- The testing of our own staff expert using manual testing techniques included disabling
 Javascript, CSS and other web applications on a page-by-page basis to assess accessibility.

Participants

The following table provides a brief profile of the three (3) 'user/experts' that assisted with the *somervillema.gov* evaluation. Understanding how different users navigate through website with a range of abilities and assistive technologies helps to frame the significance of the identified issues and recommended solutions. All three 'user/experts' were formers resident of Somerville and had some experience using the website in the past.

User/expert	Age	Functional Limitation	Individual characteristics for navigating websites
Lindsay	XX	Totally blind since birth, Primarely use JAWS for Windows screen reader; MAC and iOS device (iPhone) with VoiceOver screen reader.	Navigate by links through a website, using the TAB function. Also uses extensively the searsh function to get to specific information. Often she will go directly to the bottom of a page and starts navigate the links backward expecting to find there the most useful information. Considers herself to be a technology enthusiast and began using assistive technologies from an early age.
Rachel	34	Legally blind, primarily uses screen magnifier (ZoomText v.10.0.2)	Uses ZoomText for magnification and increased contrast through very low level screen reading
Roger	60	Totally blind since birth, moderate/severely hearing impaired past two years, uses screen readers, braille devices, hearing aids, OCR, specialized software.	Uses JAWS screen reader, prefers to understand the general layout of a website first and then focus on the core content. Users document markup to help navigate (e.g. Headings, Element Titles, etc.) Appreciates clear and simple layout of websites. Uses the web extensively for getting information.

Context of Use in the Test

Each user/expert was provided with a list of representative webpages to review and asked to review the pages in the method that was most natural to them. Most of the participants accessed the website through their personal computers or work computers. The participants tested the website using differents browsers (Internet Explorer 8, Safari, Mozila Firefox) and platforms (Windows and IOS).

Tasks

Then the user/experts were given a set of tasks to perform in the website such as: request services from the custodians; find informations about services offered by the city etc.. This made them focus on several key pages, noting their experiences with navigation and accessing specific types of features such as menus, forms, search fields and specific types of content such as linked documents. Each user/expert commented on aspects of the website that worked well and those that did not work well for them according to their individual style of navigating and accessing content in websites.

Expert Review Tools

For the expert review, IHCD staff used primarily the JAWS screen reader software and Zoom text along with a variety of online tools to check the accessibility of the website. These were used, in some cases, to try and re-create issues that the user/experts encountered in navigating through the website.

Experiment Design

Beyond providing a list of what part of the websites to access and a general set of post-review questions, user/experts were not provided specific instructions. This was done in an effort to ensure that the feedback obtained would be based on each user's natural navigation pattern.

Procedure

Below is a list of some general questions that were presented to each of the user/expert. Follow up questions were provided in response to specific issues or challenges that users individually encountered during their individual review.

Participant General Questions

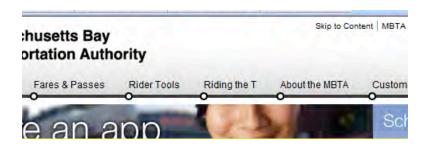
- If you are using an assistive device, what type are you using?
- What was your experience navigating through the various links and pages on the website?
- Were you able to access any interactive features such as search or forms?

- Were you able to access any content in video or image format?
- What did you like about the layout of the website?
- What did you not like about the layout of the website?
- What are your recommendations for improving the website?
- Were you able to locate general information about accessibility for the City of Charlotte?

Review of Findings

<u>Use appropriate headings</u>. A persistent lack of heading structure was the most frequently cited issue users with low vision and no vision encountered while using the Somerville website. While the primary purpose of headers are to denote section breaks in webpages, screen reader and other assistive technology users have the ability to navigate web pages by structure. This means that the user can read or jump directly to top level elements heading level 1(<h1>), next level elements heading level 2 (<h2>), third level elements heading level 3 (<h3>), and more. Viewing or listening to this outline would provide them a good idea of the contents and structure of the page much in the same way that a sighted user would visually scan an outline. A number of the user/experts commented that navigation works better on websites where heading structure was provided. Most of the pages under *Somervillema.gov* did not make use of this important HTML markup feature.

<u>Use "Skip Navigation to Content" links effectively</u>. "Skip Navigation Links" provide a standard method to allow users to bypass lengthy navigation links and access core content. Many accessible websites are able to incorporate an invisible or visible 'skip navigation to main content' link so that a screen reader user can quickly access the main content of the page. On *Somervillema.gov* homepage, there are no obvious "skip to main content" links. Each page should have one Skip Navigation Link and that link should be located as close as possible to the *main Header* of the web page. Also, it would be beneficial to have *visible* Skip Navigation Links because even users that navigate using keyboard only access (tabbing through) would find this feature useful. Below is an example of a website with a visible Skip Navigation link.



Example of a website with a visible 'Skip Navigation to Content Link'.

Missing Form labels provide labels for input fields. Users with disabilities, especially those who are blind or visually impaired, need to know the purpose of a specific form control and interact with it. Numerous form <input>, <select>, or <textarea> did not have corresponding labels. (Note: Labels are not required for image, submit, reset, button, or hidden form element types.) Markup should properly associate a form *label* with the input element. If a user comes up to an area where they have to enter information then it should be labeled correctly as to what information they are being asked for so the user knows. Without properly labeled forms, it is confusing and unclear so users can be disorganized, confused or just get frustrated by the page not being clear. The label attribute is accepted by a variety of assistive technologies and is useful whether the user is navigating using keyboard shortcuts, tabbing through or filling out a form in the forms mode of assistive technology such as JAWS. An example of the label markup is below.

	<label for="name">Name:</label>	
Name:	<input id="name" name="textfield" type="text"/>	
	\limput \frac{1}{10} \frac{1}{	

Label with descriptive information all images and image maps. All images and image maps should have associated alternative text. In instances where the image is not significant to understanding the content of the page (decorative image) it is acceptable to enter a null Alternative Text. On Somervillema.gov most of the images are labeled with alternative text but lack descriptive information. Find details about how to provide adequate alternative text here:

http://webaim.org/techniques/alttext/

<u>Use CSS instead of tables to visually layout blocks of related content</u> Tables should be used only for organizing data in rows and columns. Use CSS instead of tables and nested tables to visually lay out blocks of related content for graphical rendering. The use of tables for the layout of Menu and several graphical element-like forms is not recommended and considerably slowed down the navigation for the user with no vision using a screen reader.

Ensure that multi-media and dynamic content are accessible Ensure multi-media elements such as video and dynamic content are accessible and that accessibility features such as closed captioning and audio description are available and working. Media players that are embedded in a website should be accessible; the controls should be operable by keyboard-only access and screen readers. Media content whether audio or video should not load automatically when a user reaches a webpage. Flash content is generally not accessible so provide alternate means for users to access this content.

<u>Use appropriate font sizes</u> ensure that font sizes can be increased independent of the styling of the webpage. Ensure default text is *at least* 9-10 points/pixels high. A size of 12-14 points/pixels for body is generally recommended for body text (depending on audience). The WCAG Guidelines recommend ensuring that text can be zoomed to 200%. Use relative font sizes to ensure the text can scale. See the guidance from WCAG 2.0 1.3.4 regarding text sizing. http://www.w3.org/TR/WCAG20/#content-structure-separation

<u>Provide enough contrast throughout the website</u> Make sure to provide suffisient color contrast for text tourough the entire website. The WCAG 2.0. Guidelines require a contrast ratio of at least 4.5:1 for small text and at least 3:1 for bigger text. This is a good tool to check the color contrast when developing your page http://webaim.org/resources/contrastchecker/

<u>Use a consistent layout throughout the website</u> The primary problems encountered by the user/experts was the inability to find information and the complexity of the navigation. Use a

consistent layout for all the pages, and make sure that there are elements that the user can rely on for the entire navigation (consistent footer that are the same across all pages, search box and menu always in the same pages). This is recommended by WCAG (guideline 3.2 consistent navigation) and would ease considerably the experience of users with cognitive disabilities as well as older users and user that visit the site for the first time. More information at

http://www.w3.org/WAI/GL/UNDERSTANDING-WCAG20/consistent-behavior-consistent-locations.html

Ensure that the documents offered on the website (PDF, Word document) are accessible

Every document on the website offered to the user in a PDF format should be accessible to screen reader users and users with low vision. If the PDF is a form has to be filled, make sure to create an accessible fillable pdf. Adobe acrobat provides many easy tools to include accessibility features into your document and make them conform to section 508 and WCAG 2.0. Guideline. see the link for detailed information:

http://help.adobe.com/en US/acrobat/using/WS58a04a822e3e50102bd615109794195ff-7d10.w.html

<u>Identifying Logical Tab Order</u> Ensure that all content can be accessed with the keyboard alone. For the most part, Web developers don't need to worry about specifying the tab order of the elements on their Web pages. Well-designed pages and/or tables usually have a built-in logical tab order. At times, though, a page—especially a page with forms—can benefit by assigning the tab order to form controls and/or links. To specify the tab order of an element, add a <u>tabindex</u> attribute to the tag. For example, <u>tabindex="1"</u>, <u>tabindex="2"</u>, etc.

Page by Page Findings

Homepage URL: http://www.somervillema.gov/

Departments URL: http://www.somervillema.gov/departments

Frequently Asked Questions URL: http://faqs.somervillema.intelligovsoftware.com/home.aspx

Adress Lookup URL: http://www.somervillema.gov/residents/address-lookup

Welcome to Somerville Video

URL: http://www.somervillema.gov/departments/mayor/welcome-to-somerville

Squares and Neighborhoods - Assembly Square

URL: http://www.somervillema.gov/departments/ospcd/squares-and-neighborhoods/assembly-square

Snow emergency procedure

URL: http://www.somervillema.gov/snow

Employement Opportunities

URL: http://www.somervillema.gov/snow

Form Library

URL: http://www.somervillema.gov/forms?page=1&field_document_namevalue=[blank]

Constituent Services

URL: http://citizen.somervillema.intelligovsoftware.com/CreateAccount.aspx

External Websites Also Considered

Somerville Public Schools

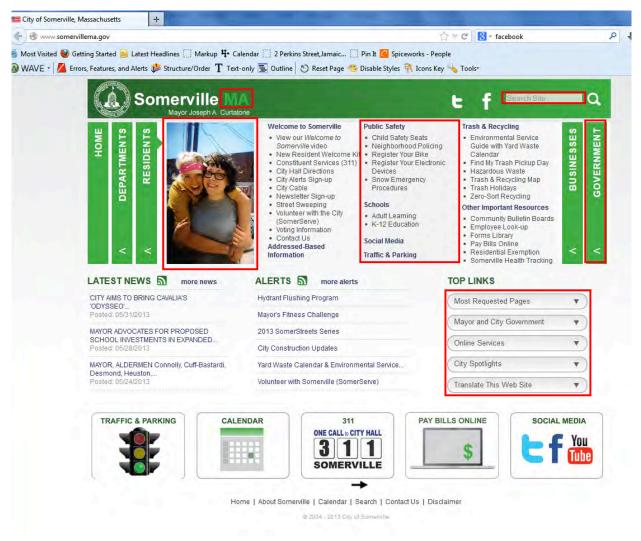
URL: http://www.somerville.k12.ma.us/education/components/docmgr/default.php?sectiondetailid=1
9179

Somerville Public Library

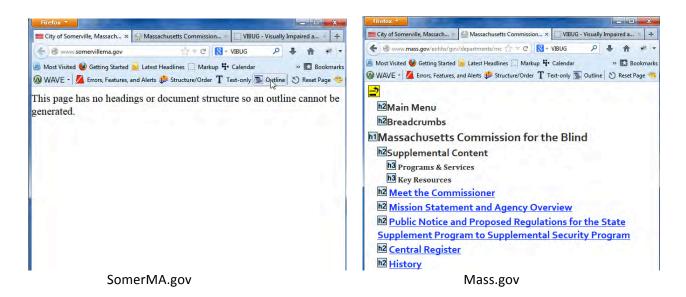
URL: http://www.somervillepubliclibrary.org/

Homepage

URL: http://www.somervillema.gov/



- 1) The language of the document is not identified. Identifying the language of the page allows screen readers to read the content in the appropriate language. It also facilitates automatic translation of content. The language feature could be easily identified in the HTML code of the page with the language attribute.
- 2) The Page does not have heading structure, proper HTML markup that is important for ease of navigation, particularly for users of assistive technology.
 Looking at the Heading structure information offered on Somervillema.gov in comparaison to another website (Mass Commission for the Blind):



3) The 'MA' in Somerville MA offer poor contrast and was not discernible for user/expert with low vision



- 4) The vertical text on the Menu 'HOME' 'DEPARTMENT' 'RESIDENT' 'BUSINESSES' are difficult to read for most users, vertically placed text is not recommended for readability, and the use of all Capital letters in title make it harder to read.
- 5) The page has no "skip navigation links" that would allow the user to jump to the main content. To ease navigation, place a skip navigation link near the top of the page anchored to the main page content.
- 6) The black arrow to navigate through the image at the bottom is not sufficiently obvious. None of the users realized that there was more content to be explored. A possible solution would be to place bigger arrows on both sides of the horizontal menu



- 7) The user, especially those using a screen reader, found it difficult to navigate through the main menu. They appreciated the use of list of links but couldn't understand the structure or organization behind the menu and couln't understand why some items where in a list and some were not. Best practice would be to create a nested list for every link in the menu using a sublist when needed. User where also confused about having the first menu alphabetized (department) then loosing that structure in the other menu (business F.i)
- 8) The pictures in the slide show under 'Home' are missing descriptive Alternative Text. All of them have "Somerville imagery" for Alternative Text, which is not giving any information about the content.



9) Poor contrast in the searsh box:



- 10) The alternative text on the image does not offer enough information about the picture. The picture of the two girls cheering and holding each other is just labeled as: "two women"
- 11) The 'Top link' menu is not read by screenreaders so is inaccessible to users with no vision. For user/epert with low vision, it was very challenging to access the item at the bottom of that menu (f.i.: FAQS) because when accessing only a portion of the screen at the time the user cannot click

the bottom link without having the menu disappear. For users with dexterity impairement, the menu is not accessible by keyboard



12) The footer was identified by all user/experts as one of the most important navigation elements. It is the first place they look when looking for basic information. It is important to keep consistency on the footer in every page of the website. The footer style and content is different depending on the pages. The more extensive footer available on the secondary page should be accessible from the front page and FAQ's page

Main Page:

Home | About Somerville | Calendar | Search | Contact Us | Disclaimer

Secondary page:

Home | About Somerville | Calendar | What's New | Employment Opportunities | Search | Contact Us | Disclaimer

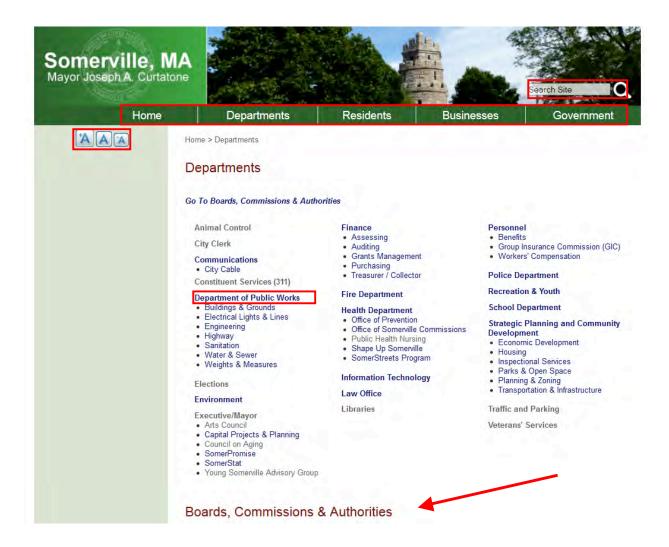
FAQ's page:

<u>Home | About Somerville | Calendar | Search | Contact Us | Disclaimer</u>

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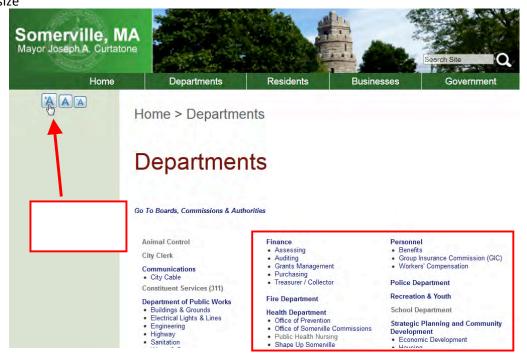
Departments

URL: http://www.somervillema.gov/departments



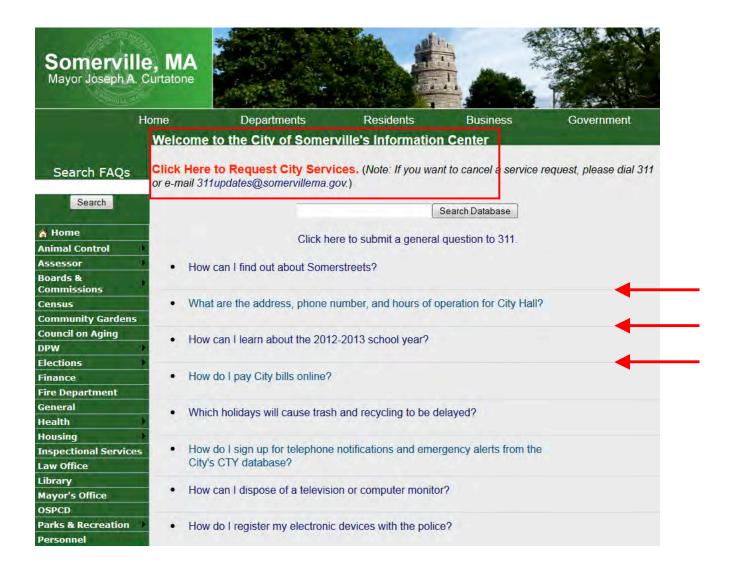
- 1) Search box not very visible for users with low vision.
- 2) Top menu in a table is hard to Navigate.
- 3) There should be a 'skip nav' link to be able to access the content directly.
- 4) The control for the font increase are read as "-A link; A link; +A link " It is the labeled in the wrong order and the user couldn't guess what they were. Label those better for instance: "Increase font size and " decrease font size."

- 5) Most of the users didn't see the secondary menu "Boards, Commissions & Authorities." This could be avoided by using a Heading structure or having a description at the top of the page to say that the page is composed of two main Menus.
- 6) The blue font used for the Menu does not provide enough contrast for users with low vision.
- 7) The tool to increase and decrease the font size only applies to the title of the page. The text of Maximum the menu remained the same size. font size



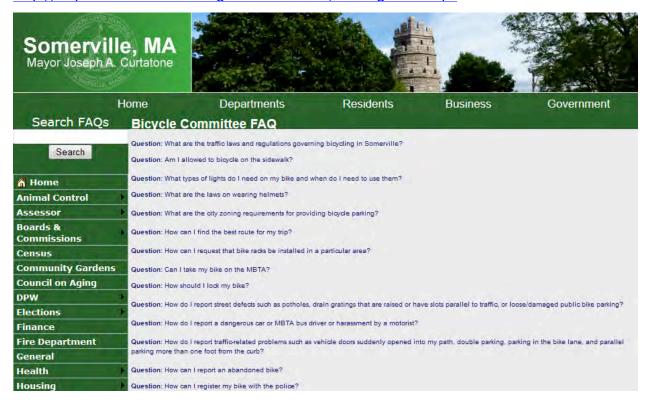
Frequently Asked Questions

URL: http://faqs.somervillema.intelligovsoftware.com/home.aspx



- 1) There is nothing on the title that indicates that we are on the 'frequently asked questions' page.
- 2) The layout is completely different, the search box is located at a different place and the menu on the left is hard to see. All the users saw the content on the middle page before noticing the left menu.
- 3) With the question in the middle and using list and slash for layout, it's very confusing when read by a screen reader between each question it read "list; bullet; empty list; dash dash dash"

The question layout on the other page was much easier to navigate- ex: on page http://fags.somervillema.intelligovsoftware.com/heatingissues.aspx

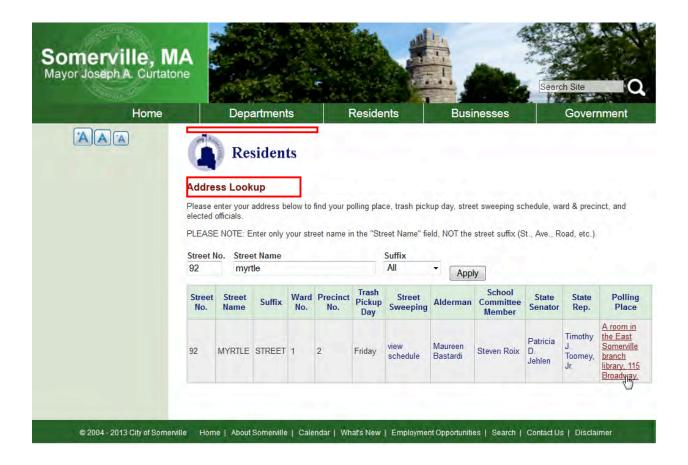


- 4) The font size is too small and there is no button to increase the font size like on most of the others pages of the website
- 5) Most of the users didn't see the secondary menu , the secondary also wasn't accessible for screen readers



Adress Lookup

URL: http://www.somervillema.gov/residents/address-lookup



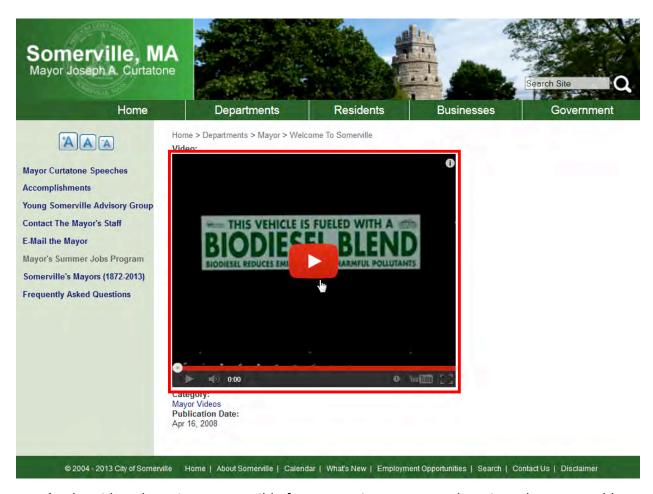
- 1) User were confused by the menu title "Address-based information" that links to this page.
 When you arrive on the page the title changes to "Address Lookup." To avoid confusion make sure to be consistent and that the menu item title correspond to the title of the page it links to.
- 2) Users with low vision or no vision were able to navigate this table, fill the form and access the information.
- 3) When you first arrive on the page there is a 'breadcrumb' on the top of the page that disappears when you effectuate the search. This was confusing for users that use breadcrumbs

for the navigation to get back to the menu.



Welcome to Somerville Video

URL: http://www.somervillema.gov/departments/mayor/welcome-to-somerville



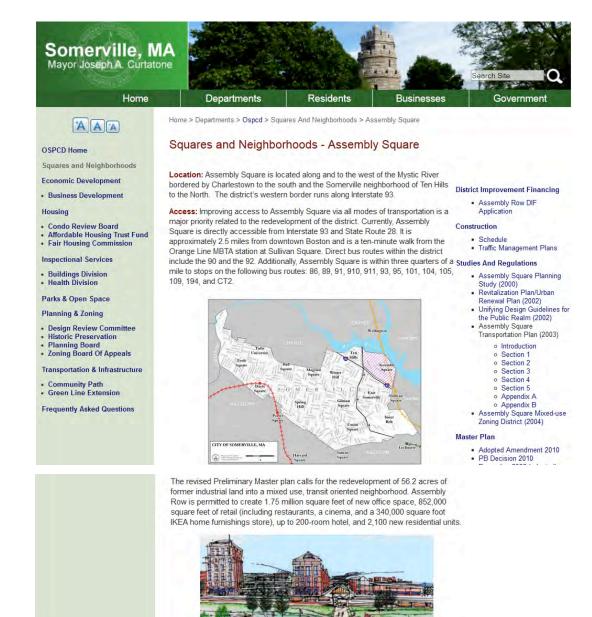
- 1) The Video player is not accessible for users using screen readers since they are unable to start the video or access any of the controls in the video window.
- 2) Captioning is not provided for the video. There is automatic captioning provided by YouTube but it doesn't make sense because it wasn't edited. For instance closed captioning shows "the most dangerous part of the community" when the video actually says "the most densely

populated community."



Squares and Neighborhoods - Assembly Square

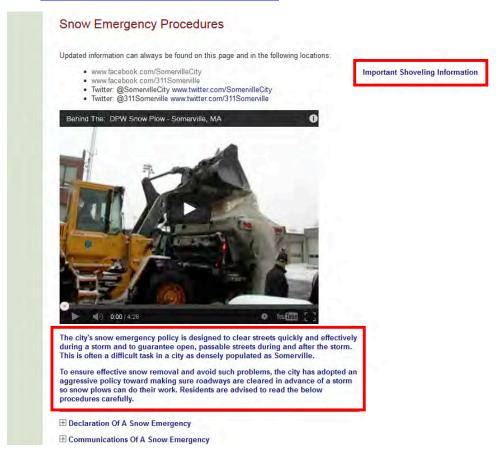
URL: http://www.somervillema.gov/departments/ospcd/squares-and-neighborhoods/assembly-square



1) All the pictures in this section lack Alternative Text.

Snow emergency procedure

URL: http://www.somervillema.gov/snow



- 1) No captioning for the video.
- 2) 'Important shoveling information' is on the far right of the screen which makes it easily missed.

 Users with screen magnifiers missed that information. Especially if something is important, put the information on the top left of the screen, and make sure it stands out from the rest of the information.
- 3) Avoid bolding a large amount of text. Use bolding only for emphasis in a limited pice. Bolding of an entire text make it very hard to read.
- 4) The bold text is not resizing when using the button to increase font size.

Employment Opportunities

URL: http://www.somervillema.gov/residents/job-postings

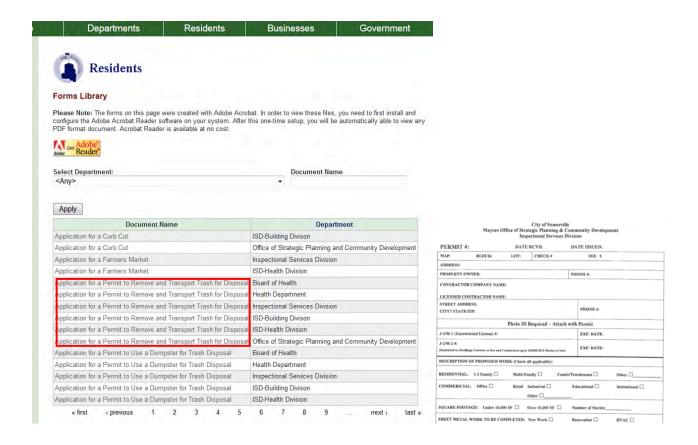


- 1) All the users made the comment that the *somervillema.org* website was missing a job posting section. Because none of them was able to find it. Users with and without disabilities did not see that the menu with icons on the front page was a scrolling menu and were not able to find this page using the primary menu, footer or the search box. This page seems to be one of the first things users would look for so it makes sens to have multiple way to access it. Adding it into the footer on the front page and the primary menu is recommended
- 2) Make sure to keep consistent name of link and title for a page. This page is called "employement opportunities" in the footer then the title is "job postings."
- 3) Users with no vision commented on the department filtration box that it is not helpful and slows down their navigation. They would prefer to be able access directly to a list of job posting.

4) Users with low vision and no vision were able to read content of this page and to access to the detailed job descriptions without issue.

Form Library

URL: http://www.somervillema.gov/forms?page=1&field_document_namevalue=[blank]



- Inaccessible PDF, none of the PDFs provide an accessible way to be filled online. See this
 documentation to learn about accessible fillable PDFs: http://www.pdf-accessible.com/en/accede-manuals/
- 2) Some of the PDFs are just document scans so cannot be read by the screen reader, example: http://www.somervillema.gov/sites/default/files/documents/SheetMetalApplication.pdf
- 3) The list confused many users because the same form is listed six or seven times, the user couldn't figure out which one they needed to fill. Avoid the repetition of the same link. It may be worth reconsidering whether sorting the forms by department is valuable to most people.

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Constituent Services

URL: http://citizen.somervillema.intelligovsoftware.com/CreateAccount.aspx



Request City Services

- 1) Hard to find.
- 2) For screen reader users there is no way to know which field are optional, it does read "star first name" but it is missing an explanation about what it means.
- 3) Blind users failed to fill in the phone number field because they added spaces or dashes between the numbers. The software fills in automaticly a dash between numbers but this isn't read by the screen reader. Also the phone number format was not read by the screen reader so people were confused about whether they needed to insert the area code.
- 4) This entire form is inaccessible because of the use of the "Capcha (numerical and letter code)" security feature that does not provide auditory alternative.
- 5) The 'create account' button is not proprelly labeled and is read by the screen reader as "Ctl00\$maincontent\$loginsummitbutton" it should just be labeled "create account."

Commission for Persons with Disabilities

URL: http://www.somervillema.gov/departments/commission-for-persons-with-disabilities



- 1) None of the users where able to find this page using the menu or the searsch function. Perhaps make a link on the navigation available under "departments" on the first page.
- 2) When the function to increase font size is set at the maximum, part of the text doesn't resize.
 Make sure that the entire text resizes, this can probably be fixed easily by an appropriate use of headings. This issue is present on most pages accros the whole website.
- 3) The alternative text on the image "person with disabilities" does not adequately describe what is seen on the image.

Somerville Traffic and Parking

URL: http://www.parksomerville.com/index.php



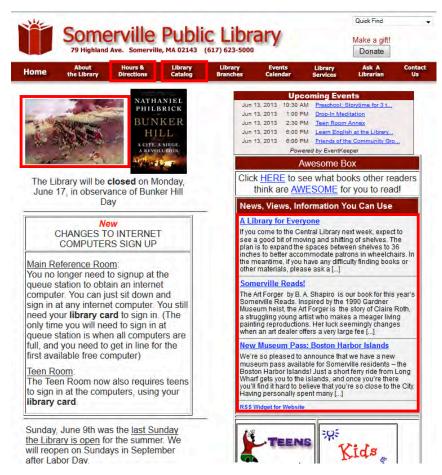
- 1) Users of screen magnifiers could experience difficulty with the limited color contrast found in the menu at the top of the page when hovering the items on the top menu
- 2) The text in the banner is too small to be read.
- 3) Use a more descriptive text for the images on the bottom of the pages, the descriptions "residents" "visitors" "businesses" do not say anything about what is seen in the picture, prefer something like "Kids and teenagers playing basketball outdoors."

External Website Services:

Throughout the website SomervilleMa.gov link to external website oftens opens up in a pop-up window, pop-up windows are not recommended and they have been seen to confuse the users in their navigation. Also most of the users are using pop-up blocker to avoid spam and advertising has the result of preventing users from accessing the content and in most cases they won't be able to perform any actions.

Somerville Public Library

URL: http://www.somervillepubliclibrary.org/



- 1) Lack of Headings structure in the entire website.
- 2) Lack of Alternative text in the entire website.
- 3) The layout is very cluttered and confusing.

Somerville Public School

URL: http://www.somerville.k12.ma.us/education/components/docmgr/default.php?sectiondetailid=1
9179



- 1) No headings.
- 2) None of the images on the slider was provided an Alternative Text. A lot of the information (calendar; info) is provided by image that don't have Alternative Text
- 3) Every bullet is an image and reads to the screen reader as if there is content. Should be null text here.

Conclusions

By addressing the key findings identified earlier, the City of Somerville can make significant progress toward ensuring the accessibility of the *Somervillema.org* website. Moving forward it would be important to keep in line with developments related to the harmonization of Section 508 with WCAG 2.0 and to eventually bring the entire site up to the finalized standard fo the "Refresh of Section 508." It would also be important for the *Somervillema.org* website team to continue to include older users with disabilities and members of the immigrant communication across the spectrum of skill and technology ability for ongoing testing and evaluation of the website. Furthermore, future online service application procurement processes should factor in accessibility to avoid the situation of linking city services to inaccessible external service provider websites.

A lot can be improved in the website architecture and organization to make it easier to navigate and more intuitive. The users commented on the overwhelming amount of information. In most cases users will navigate the website looking for basic information do that should be highlighted and easy to find.

Resources

Guidelines

Section 508 Standards http://www.access-board.gov/sec508/standards.htm

World Wide Web Consortium, Web Accessibility Initiative http://www.w3.org/WAI/

Groups

Web Accessibility in Mind (Web AIM) www.webaim.org

Assistive Technology Industry Association http://www.atia.org

Captioning and Transcripts and Video Remote Interpreting

Captions and Transcription Services http://www.uiaccess.com/transcripts/transcript_services.html

Open Source Subtitling Tool http://www.universalsubtitles.org/en/

Purple Video Remote Interpreting http://www.purple.us/

Audio Description of Visual Information

Web AIM http://webaim.org/techniques/word/

University of Wisconsin at Madison http://www.doit.wisc.edu/accessibility/online-course/index.htm

University of Washington, Accessible Multimedia Brochure

http://www.washington.edu/doit/Brochures/Technology/vid_sensory.html

Multi-media Access Generator (MAGpie) http://ncam.wgbh.org/invent_build/web_multimedia/tools-guidelines/magpie

Audio Description http://www.astc.org/resource/access/medad.htm

Guidelines for Visual Descriptions: http://www.csun.edu/cod/conf/2001/proceedings/0031alonzo.htm

Tools

WAVE Accessibility Evaluator http://wave.webaim.org/

Open Source Screen Reader_http://www.nvda-project.org/

JAWS Screen Reader_http://www.freedomscientific.com/products/fs/jaws-product-page.asp

Lynx Viewer (View Website in Text Only Format) http://www.delorie.com/web/lynxview.html

Applications

JW Media Player http://www.washington.edu/accessit/articles?1251

YouTube with an "Accessible Skin" http://icant.co.uk/easy-youtube/docs/index.html

Software and Service Providers

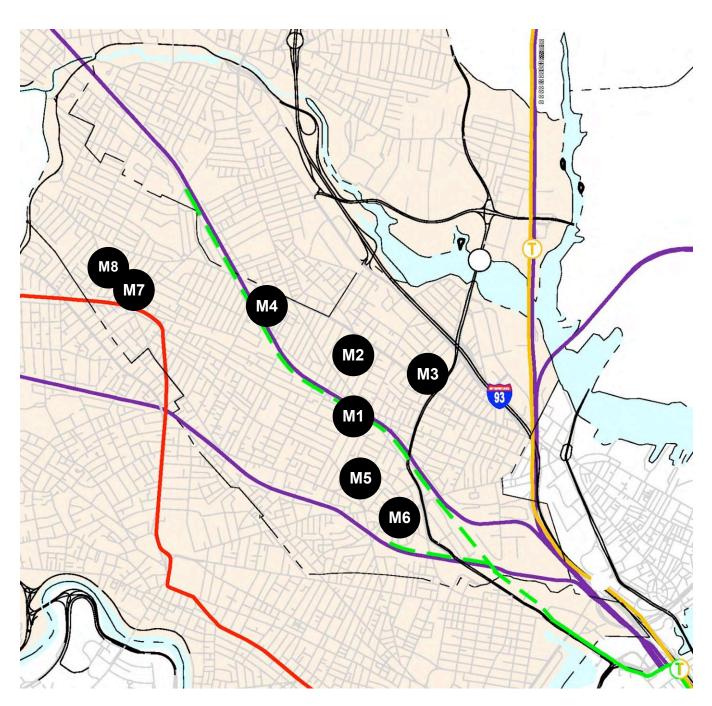
Net Centric Technologies (PDF Conversions) www.CommonLook.com



PART D

Evaluation of Facilities





Municipal Buildings

- M1 City Hall
- M2 City Hall Annex
- M3 Cross Street Senior Center/ Recreation
- M4 DPW Building
- M5 Recreation Building
- M6 SCAT Building
- M7 Traffic & Parking
- M8 Tufts Administration Building





City Hall

M1 - City Hall

Building Description

Located at the intersection of Highland Avenue and School Street, City Hall is a four-story brick structure that sits atop Central Hill next to the High School. City Hall houses many offices offering programs and services on all floor levels. The building has entrances on two sides – on School Street and along the parking lot next to the High School. Both entrances are accessible via ramps, although the ramp on School Street has surface and handrail issues.

Off-street staff and public parking is offered in the parking lot next to the High School. Two accessible parking spaces for public or staff were identified at this facility. At the School Street entrance, an egress stairway offers vertical circulation to all floor levels. Another egress stairway connects the second and third floors to the terrace on Highland Avenue. An elevator is provided in this facility.

Toilet rooms for staff and public use are located on the basement level and second floor. Although these toilet rooms can be used by residents and staff with disabilities, neither is in full compliance with current accessibility requirements. Additionally, one inaccessible toilet room for female staff use is located on the first floor.

Services to public are offered on all floor levels, including the basement. However, most areas used for business transactions with the public have counters that exceed the maximum allowable height.

A raised section of the Aldermanic Chamber on the second floor and a portion of the basement are not on accessible route because of several steps.

Structural Accessibility

While it was designed and built prior to state and federal accessibility regulations and has undergone some accessibility upgrades, the City has ongoing obligations for accessibility:

The City must ensure that the public can access the programs, services and activities at the City Hall.

Aside from modifying policies and procedures to ensure programmatic access, this also means:

- Elements that were not constructed in compliance with code must be corrected to current standards.
- As alterations and renovations are undertaken, elements that are not accessible must be brought into compliance with current 521CMR and 2010 ADA Standards.
- Building elements that are inaccessible as a result of new standards adopted since they were built, need to be brought into compliance if they are a barrier to equal participation in programs, services and activities offered.



Photo 1



Photo 2



Photo 3

Issues

Priority 1 – Approach & Entrance

Parking & Drop-off Area

Off-street parking is shared with the adjacent High School. Two accessible spaces are provided immediately beyond the City Hall entrance and ramp; however, these parking spaces slightly exceed the maximum allowable slopes and surfaces and striping are degraded. (Photo 1)

Sidewalks and Curb Ramps

Exterior sidewalk access to City Hall is problematic because of non-compliant curb ramps and sidewalks with deteriorated surface that can become tripping hazards to the public and staff. At the accessible parking space closest to both City Hall and the High School, the curb ramp and sidewalk have eroded and there is a 1-2" lip as it joins the access aisle. (Photo 1)

At the School Street entrance, the curb ramp lacks a level landing and worsens the sidewalk cross slope. Finally, a walkway between the sidewalk and the egress terrace adjacent to Highland Avenue is not provided.

Entrances

The building has entrances on two sides – on School Street and along the parking lot next to the High School. Both entrances are accessible via ramps, although the ramp on School Street has surface and handrail issues. (Photos 2 and 3)



Photo 4



Photo 5



Photo 6

Priority 2 – Access to Goods & Services

Doors

Throughout the building the following issues were identified:

- Some doors to public spaces and offices do not have the minimum clear width for accessible doors;
- A few doors have inaccessible hardware or locks;
- Several single- and double-leaf doors exceed the maximum allowable force required to open them;
- Numerous doors have non-compliant hardware and do not have the minimum maneuvering clearance required to open them. (Photo 4)

Floor Surfaces

At all entrances as well as other circulation areas within the building, several weather mats are not secure and can become tripping hazards to visitors and staff. (Photo 5) High thresholds that exceed height or bevel requirements are found in some rooms and at the building entrances.

Protruding Objects

Hazardous protruding objects, such as the unprotected underside of the stairway and the wall-mounted shelf near the exterior doors, were found on the School Street entrance.

These protruding objects increase the likelihood of injuries among people with low or no vision or others who may be unobservant. (Photo 6)

Accessible Route

Steps prohibit access to portions of the Aldermanic Chambers.



Photo 7



Photo 8



Photo 0

Sale & Service Counters

At the entry lobby on the first floor and most offices, counters exceed the maximum allowable height for visitors using wheeled mobility devices or who are of short stature. In the lobby on the first floor, boxes, planters, and other obstructions impede the approach to the information counter. (Photo 7)

Offices with inaccessible counters include, but are not limited to, the following:

- Election Census on the basement level;
- City Clerk on the first floor;
- 311 on the first floor:
- Treasurer's Office on the first floor;

Stairways

At the School Street entrance, an egress stairway offers vertical circulation to all floor levels. Another egress stairway connects the second and third floors to the terrace on Highland Avenue. Neither stairway has compliant handrails. (Photo 8)

On the basement level, an internal stairway with non-compliant handrails leads to the Constituent Services 311 office and Office of Communications and TV Cable. (Photo 9)



Photo 10



Photo 11



Photo 12

Lift

On the basement level, an inclined lift is provided at the stairway that leads to the Constituent Services 311 office and Office of Communications and TV Cable. Although this lift can be independently operated by customers, it does not meet minimum allowable weight capacity, the transition plates are not flush with floor surfaces and, when deployed, the lift blocks half of the egress stair and other code related issues. (Photo 9)

Elevator

The door panel covering emergency intercom is not accessible and the elevator inspection was expired.

Signage

While some signs have been updated in certain areas of the building, the remaining older signage is problematic because not all permanent rooms and spaces are properly identified with ADA-compliant signs. (Photos 10, 11, and 12)



Photo 13

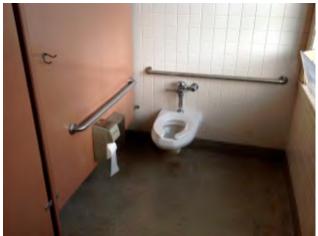


Photo 14



Photo 15

Priority 3 – Toilet Rooms

Toilet Rooms

Toilet rooms for staff and public use are located on the basement level and second floor. Although these toilet rooms can be used by residents and staff with disabilities, they are not in full compliance with current accessibility requirements.

In both multi-user toilet rooms on the second floor, plumbing underneath lavatories is not protected. In the men's toilet room, an accessible urinal is not provided, the radiator inside the toilet stall encroaches the clearance of the stall, and the wall-mounted paper towel dispenser behind the door obstructs the swing of the door. In the women's toilet rooms, the flush control of the toilet is mounted on the incorrect side and the side grab bar does not meet the minimum allowable height inside the accessible toilet stall.

In both single-user toilet room on the basement level, faucets are non-compliant, plumbing underneath lavatories is not protected, grab bars do not meet the minimum allowable height, and curbs on one of more sides of toilet obstructs the clearance of the fixture.

Additionally, one inaccessible toilet room for female staff use is located on the first floor. (Photos 13, 14, and 15)



Photo 16

Photo 17

Priority 4 - Additional Access

Kitchenette

On the basement level, the kitchenette has not been renovated and lacks clear floor space and an accessible sink, among other items. (Photos 16 and 17)

Recommendations

Priority 1 – Approach & Entrance

Parking & Drop-off Area (cost estimate – up to \$5,000)

- 1. Re-stripe parking spaces with missing or fading markings.
- 2. When the entire parking lot is repaved, regrade accessible parking spaces so that slopes do not exceed 2% in any direction.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and General Site and Building Elements for Accessible Parking.

Sidewalks and Curb Ramps (cost estimate – up to \$25,000)

- 1. Repair or replace broken or heaved sidewalk panels.
- Replace curb ramps adjacent to accessible parking (in conjunction with parking improvements), at the intersection of School Street and Highland Avenue as well as the School Street accessible entrance to City Hall.
- 3. Re-grade driveway aprons and replace curb ramps along Highland Avenue.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Accessible Routes and Curb Ramps.

Entrances (cost estimate – up to \$25,000)

 Reconstruct the ramp at the School Street accessible entrance. If a level landing and compliant door threshold cannot be provided, install an automatic door opener.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Ramps.

Priority 2 – Access to Goods & Services

Doors (cost estimate – up to \$5,000)

- When doors do not have the minimum clear width for accessible doors, either keep them open during regular hours or replace them with wider doors.
- 2. Replace door knobs with lever hardware.
- Create a comprehensive maintenance program and schedule to check and adjust the opening force of all exterior and interior doors. Where not possible, either keep heavy doors open during regular hours or add automatic openers.
- Provide an automatic opener wherever doors do not have the required maneuvering clearance on their latch side. Prioritize entry doors and doors to toilet rooms.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Doors, Doorways, and Gates.

Floor Surfaces (cost estimate – up to \$1,000)

 Secure all weather mats with industrialstrength double-stick tape. Alternatively, replace them with recessed walk-off mats or grates.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Floor Surfaces.

Protruding Objects (cost estimate – up to \$1,000)

 Install cane-detectable barriers to protect the underside of the stairway and the wallmounted shelf found on the School Street entrance. Cane-detectable barriers could be trash cans, fixed panels, furniture, or other permanent barriers.

For additional information, please see Part E – ADA/MAAB References – Building Blocks for Protruding Objects.

Accessible Route (cost estimate – TBD depending on scope)

1. Develop access to the raised portion of the Aldermanic Chambers.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Accessible Routes.

Sales and Service Counters (cost estimate – up to \$10,000)

- Short term: Provide an auxiliary counter with a maximum height of 36 inches in close proximity to the main counter, or provide equivalent facilitation. Equivalent facilitation may be provided in the form of a folding shelf attached to the main counter, an auxiliary table nearby, a clipboard made available to the public, or other means.
- 2. Long Term: Prioritize the installation of accessible counters at high traffic areas.

For additional information, please see Part E – ADA/MAAB References – ADA Reference – Built-in Elements for Sales and Service Counters.

Stairways

(cost estimate – up to \$5,000)

- Install compliant handrails on both sides of the egress stairway between the second floor and the egress terrace adjacent to Highland Avenue.
- Develop policies and procedures to evacuate individuals unable to navigate stairs.

For additional information, please see Part E – ADA/MAAB References – Scoping for Emergency Egress and General Site and Building Elements for Stairways.

Lift (cost estimate – up to \$1,000)

 After relocating the Constituent Services 311 office and Office of Communications and TV Cable, remove the inclined lift provided at the stairway on the basement level.

For additional information, please see Program Accessibility.

Elevator (cost estimate – up to \$1,000)

 Remove door panel covering emergency intercom. Schedule yearly maintenance and inspections.

For additional information, please see Part E – ADA/MAAB References – ADA Reference – Accessible Routes for Elevators.

Signage (cost estimate – up to \$10,000)

 Implement a comprehensive signage plan to ensure that ADA-compliant signs are installed alongside all doors to identify permanent rooms and spaces.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 3 - Toilet Rooms

Toilet Rooms (cost estimate – up to \$10,000)

- 1. In both multi-user toilet rooms, protect plumbing underneath lavatories.
- In the men's toilet room, provide an
 accessible urinal and relocate or recess the
 wall-mounted paper towel dispenser behind
 the door. Due to the location of the radiator
 inside the toilet stall, this amenity is not
 considered accessible (see
 recommendation for signage below).
- In the women's toilet room, relocate the flush control of the toilet and raise the side grab bar inside the accessible toilet stall.
- In both single-user toilet rooms on the basement level, replace the faucets with compliant ones, protect plumbing underneath lavatories, raise all grab, and

rearrange the toilets so that curbs do not obstruct the clearance of these fixtures.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Toilet and Bathing Rooms.

Signage (cost estimate – up to \$1,000)

 Install accessible signage at the women's toilet room on the second floor and both single-user toilet room on the basement level. Signage at the men's toilet room on the second floor should direct residents to the closest accessible toilet room in the facility.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 4 – Additional Access

Kitchenette

(cost estimate – TBD depending on scope)

- Short Term: Ensure policies are developed to address employee accommodation requests.
- Long Term: As kitchenettes are replaced, ensure that replacements meet all ADA/MAAB requirements.

For additional information, please see Part E – ADA/MAAB References – Special Rooms, Spaces and Elements for Kitchens and Kitchenettes.





City Hall Annex

M2 - City Hall Annex

Building Description

Located at the intersection of Evergreen Avenue and Thurston Street, City Hall Annex is a three-story, split level brick structure with public and staff spaces on the first and second floors.

The building has entrances on two sides – in the front on Evergreen Avenue and at the rear along the parking lot. Neither of the entrances is accessible since stairways are provided to the first floor about four feet above the exterior grade. A non-compliant limited-use/ limited access elevator with an expired certificate for use is provided near the rear entrance. This elevator, along with the egress stairways located at the two entrances, offers vertical circulation to all floor levels.

At least 17 off-street staff and public parking spaces are offered in parking lot adjacent to the building. One accessible van parking space for public or staff was identified near the vertical lift and the rear entrance

Toilet rooms for staff and public use are located on the first and second floors and are partially accessible.

Services to the public are offered on all floor levels, except for the basement.

Structural Accessibility

While the building was designed and built prior to state and federal accessibility regulations and has undergone some accessibility upgrades, the City has ongoing obligations for accessibility:

The City must ensure that students and the public can access the programs, services and activities at the City Hall Annex.

Aside from modifying policies and procedures to ensure programmatic access, this also means:

- Elements that were previously modified or not constructed in compliance with code must be corrected to current standards;
- As alterations and renovations are undertaken, elements that are not accessible must be brought into compliance with current 521CMR and 2010 ADA Standards;
- Building elements that are inaccessible as a result of new standards adopted since they were built, need to be brought into compliance if they are a barrier to equal participation in programs, services and activities offered.



Photo 1



Photo 2



Photo 3

Issues

Priority 1 – Approach & Entrance

Parking & Drop-off Area

Off-street staff and public parking is offered in parking lot adjacent to the building. One accessible van parking space for public or staff was identified near the vertical lift and the rear entrance. The sign that identifies the accessible parking space is damaged. (Photo 1) No drop-off area was identified in this facility.

Entrances

The building has entrances on two sides – in the front on Evergreen Avenue and at the rear along the parking lot. Neither of the entrances is accessible since stairways are provided to the first floor about four feet above the exterior grade. Neither stairway has railings that comply with requirements for handrail extensions and cross section for grasping. (Photos 2 and 3)

Elevator

A non-compliant limited-use/ limited access elevator with an expired certificate for use is provided near the rear entrance. This elevator cannot be independently operated by customers as a key is required to unlock the device. A sign with the words 'please ring bell for assistance' is located at this entrance along with the buzzer used to alert the staff. (Photo 4)

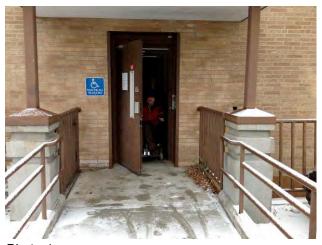


Photo 4



Photo 5



Photo 6

Priority 2 – Access to Goods & Services

Doors

Throughout the building, several single- and double-leaf doors exceed the maximum allowable force required to open them and do not have the minimum clear width for accessible doors. Several doors to offices do not have the minimum maneuvering clearance required to open them because furniture, storage, or equipment are placed too close to the doorway. Additionally, numerous doors have non-compliant hardware.

Floor Surfaces

At circulation areas as well as certain offices (i.e., Veterans Office on the second floor) within the building, several weather mats are not secure and can become tripping hazards to customers and staff. (Photo 5)

Interior Routes

In certain circulation paths, the minimum clear width is obstructed stored items and articles.

Sale & Service Counters

At the Veterans Office on the second floor, a counter exceeds the maximum allowable height for visitors using wheeled mobility devices or who are of short stature. (Photo 6)



Photo 7



Photo 8



Photo 9

Stairways

In addition to the elevator, egress stairways located at the two entrances offer vertical circulation to all floor levels. Neither stairway has railings that comply with requirements for handrail extensions and cross section for grasping. (Photo 7)

Signage

While some signs have been updated in certain areas of the building, the remaining older signage is problematic because not all permanent rooms and spaces are properly identified with ADA-compliant signs. (Photos 8 and 9)



Photo 10



Photo 11



Photo 12

Priority 3 – Toilet Rooms

Toilet Rooms

Single-user toilet rooms for staff and public use are located on the first and second floors. In both toilet rooms, plumbing underneath the lavatories is not protected for people using wheeled mobility devices, the toilet and toilet paper dispensers are not correctly placed, and the mirror and wall-mounted accessories (such as soap and paper towel dispensers) exceed the maximum allowable height. (Photo 10)

In the toilet room on the second floor, the flush valve is placed at the incorrect side of the toilet and furniture obstructs the maneuvering clearance in the toilet room. (Photo 11)

Signage

Although non-compliant signs have been installed on the doors of the toilet rooms, all toilet rooms have additional accessible signage. (Photo 12)

Priority 4 - Additional Access

Kitchenette

The kitchenette located on the second floor has not been renovated and lacks clear floor space and an accessible sink, among other items.

Recommendations

Priority 1 – Approach & Entrance

Parking & Drop-off Area (cost estimate – up to \$1,000)

 Replace sign identifying the accessible parking space. Ensure that the new sign is mounted at 96 inches above the ground.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and General Site and Building Elements for Accessible Parking.

Entrances (cost estimate – up to \$5,000)

1. Replace handrails on stairways with compliant handrails.

For additional information, please see Part E – ADA/MAAB References – General Site and Building Elements for Stairways.

Elevator (cost estimate – up to \$50,000)

 Short Term: Replace limited use / limited access (LULA) elevator with fully automatic independently accessible model. Schedule yearly maintenance and inspections.

For additional information, please see Program Accessibility and Part E – ADA/MAAB References – Accessible Routes for Elevators.

Priority 2 – Access to Goods & Services

Doors (cost estimate – up to \$5,000)

- When doors do not have the minimum clear width for accessible doors, either keep them open during regular hours or replace them with wider doors.
- 2. Replace door knobs with lever hardware.
- Create a comprehensive maintenance program and schedule to check and adjust the opening force of all exterior and interior doors. Where not possible, either keep heavy doors open during regular hours or add automatic openers.
- 4. Remove furniture and other elements blocking clear floor space on the latch pull side of doors. Provide an automatic opener wherever doors do not have the required maneuvering clearance on their latch side. Prioritize entry doors and doors to toilet rooms.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Doors, Doorways, and Gates.

Floor Surfaces (cost estimate – up to \$1,000)

 Secure all weather mats with industrialstrength double-stick tape. Alternatively, replace them with recessed walk-off mats or grates.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Floor Surfaces.

Interior Routes (cost estimate – up to \$1,000)

 Remove stored items and articles from all circulation paths to ensure a 36-inch minimum clear width.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Accessible Routes.

Sales and Service Counters (cost estimate – up to \$1,000)

- Short Term: Provide an auxiliary counter with a maximum height of 36 inches in close proximity to the main counter, or provide equivalent facilitation. Equivalent facilitation may be provided in the form of a folding shelf attached to the main counter, an auxiliary table nearby, a clipboard made available to the public, or other means.
- Long Term: Provide an accessible counter at the Veterans Office on the second floor.

For additional information, please see Part E – ADA/MAAB References – ADA Reference – Built-in Elements for Sales and Service Counters.

Stairways (cost estimate – up to \$10,000)

- Install compliant handrails on both sides of all egress stairways.
- Develop policies and procedures to evacuate individuals unable to navigate stairs.

For additional information, please see Part E – ADA/MAAB References – Scoping for Emergency Egress and General Site and Building Elements for Stairways.

Signage (cost estimate – up to \$10,000)

 Implement a comprehensive signage plan to ensure that ADA-compliant signs are installed alongside all doors to identify permanent rooms and spaces.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 3 – Toilet Rooms

Toilet Rooms (cost estimate – up to \$10,000)

- In both single-user toilet rooms on the first and second floors, protect the plumbing underneath the lavatories, relocate the toilet paper dispensers, and lower the mirrors and wall-mounted accessories.
- In the toilet room on the second floor, relocate the flush of the toilet and remove the furniture inside the space.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Toilet and Bathing Rooms.

Signage (cost estimate – up to \$1,000)

Install accessible signage at all toilet rooms.
 Where toilet rooms are inaccessible,
 signage should direct residents to the
 closest accessible toilet room in the facility.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 4 – Additional Access

Kitchenette

(cost estimate – TBD depending on scope)

- Short Term: Ensure policies are developed to address employee accommodation requests.
- Long Term: As kitchenettes are replaced, ensure that replacements meet all ADA/MAAB requirements.

For additional information, please see Part E – ADA/MAAB References – Special Rooms, Spaces and Elements for Kitchens and Kitchenettes.





Cross Street Senior Center / Recreation

M3 – Cross Street Senior Center / Recreation

Building Description

Located at the intersection of Broadway and Cross Street, the Cross Street Senior Center / Recreation is a 2-story former fire station. The building houses the Senior Center on the first floor and Recreation on the second floor. All programs, services, and activities provided on the second floor are inaccessible because no elevator is provided in this facility.

The building has entrances on two sides – an at-grade entrance on Broadway and a stepped entrance on Cross Street. Also on Cross Street, off-street staff and public parking spaces are offered in the small parking lot adjacent to the building. Although a sign designating the space as accessible was found, no other accessibility features for parking spaces were identified.

An egress stairway without compliant handrails offers vertical circulation between the two floor levels.

Toilet rooms for staff and public use are located on the first and second floors and are completely inaccessible.

Structural Accessibility

While the building was designed and built prior to state and federal accessibility regulations and has undergone some accessibility upgrades, the City has ongoing obligations for accessibility:

The City must ensure that students and the public can access the programs, services and activities at the Cross Street Senior Center / Recreation.

Aside from modifying policies and procedures to ensure programmatic access, this also means:

- Elements that were previously modified or not constructed in compliance with code must be corrected to current standards;
- As alterations and renovations are undertaken, elements that are not accessible must be brought into compliance with current 521CMR and 2010 ADA Standards;
- Building elements that are inaccessible as a result of new standards adopted since they were built, need to be brought into compliance if they are a barrier to equal participation in programs, services and activities offered.



Photo 1



Photo 2



Photo 3

Issues

Priority 1 – Approach & Entrance

Parking & Drop-off Area

One off-street accessible parking space for public or staff was identified on Cross Street. Not only is the running slope excessive, but also the access aisle and sign for van designated parking are missing. (Photo 1)

No drop-off area was identified in this facility.

Entrances

The building has entrances on two sides – in the front on Broadway and on the side on Cross Street. While the entry door on Cross Street has a step, the entry door on Broadway is an at-grade entrance. (Photos 2 and 3)

Although the Broadway entrance is generally usable by people with disabilities, a level landing adjacent to the door is not provided and the hardware is non-compliant.

Signage does not identify or direct to the accessible entrance.



Photo 4



Photo 5



Photo 6

Priority 2 - Access to Goods & Services

Doors

The double-leaf doors to the Senior Center on the first floor do not have the minimum clear width for accessible doors. (Photo 4)

Inside the Senior Center on the first floor, doors to toilet rooms and exits exceed the maximum allowable force required to open them. Throughout the building, several doors do not have the minimum maneuvering clearance required to open them because furniture, storage, or water bottles are placed too close to the doorway. Most specifically, the front entry door lacks the minimum maneuvering clearance since it is recessed within the thick brick wall on the interior. Additionally, numerous doors have non-compliant hardware.

Floor Surfaces

At circulation areas, including stairways, several weather mats are not secure and can become tripping hazards to residents and staff. (Photo 5)



Photo 7



Photo 8



Photo 9

Work Surfaces

While tables inside the Senior Center on the first floor are accessible, computers workstations inside Recreation on the second floor do not provide the require knee and toe clearance. (Photos 6 and 7)

Stairways

An egress stairway located adjacent to the lobby offers vertical circulation to both floor levels. This stairway does not have railings on both sides. (Photo 8)

Signage

While some signs for toilet rooms have been updated, very little signage is provided at this facility and not all permanent rooms and spaces are properly identified with ADA-compliant signs. (Photo 10)



Photo 10



Photo 11



Photo 12

Priority 3 – Toilet Rooms

Toilet Rooms

Multi-user toilet rooms for staff and public use are located inside the Senior Center on the first floor and Recreation on the second floor. (Photos 10 and 11)

At some point, all toilet rooms were altered to offer a few accessible features including grab bars, lever-type faucets, and wall-mounted lavatories. However, neither toilet room is accessible. The first floor toilet rooms have 1.5-3" lips into them.

Additionally, the toilet rooms inside Recreation on the second floor are not accessible since they are not located on an accessible route.

Signage

Although compliant signs have been installed near the doors do the toilet rooms inside the Senior Center on the first floor, they are not correctly place on the latch side of the doors. (Photo 12)

Toilet rooms inside Recreation on the second floor are identified with accessible signage



Photo 13



Photo 14



Photo 15

Priority 4 - Additional Access

Kitchenettes

The kitchenettes located inside the Senior Center on the first floor and Recreation on the second floor have not been renovated and lack clear floor space and an accessible sink, among other items. (Photos 13 and 14)

Thermostats

In the Senior Center on the first floor, at least two thermostats exceed the maximum allowable height required to operate them. (Photo 15)

Recommendations

Priority 1 – Approach & Entrance

Parking & Drop-off Area (cost estimate – up to \$5,000)

- 1. Provide a 96-inch wide access aisle adjacent to the accessible van space and replace sign.
- 2. When sidewalks are renovated, re-grade accessible parking space.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and General Site and Building Elements for Accessible Parking.

Entrances (cost estimate – up to \$5,000)

- 1. At front entry door, replace door knobs with lever hardware.
- 2. When sidewalks are renovated, re-grade the landing adjacent to the front entry door.

For additional information, please see Part E – ADA/MAAB References – General Site and Building Elements for Stairways.

Priority 2 – Access to Goods & Services

Programs, Services, and Activities (cost estimate – TBD depending on scope)

 Ensure all programs, services and activities offered on the second floor of this facility can be provided, upon request, at an accessible facility.

For additional information about addressing these issues, please see Program Accessibility.

Doors (cost estimate – up to \$5,000)

- On the first floor, either keep the double-leaf doors to the Senior Center open during regular hours or replace them with wider doors.
- Create a comprehensive maintenance program and schedule to check and adjust the opening force of all exterior and interior doors. Where not possible, either keep heavy doors open during regular hours or add automatic openers.
- Remove furniture and other elements blocking clear floor space on the latch pull side of doors. Provide an automatic opener wherever doors do not have the required maneuvering clearance on their latch side. Prioritize entry doors and doors to toilet rooms.
- 4. Replace door knobs with lever hardware.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Doors, Doorways, and Gates.

Floor Surfaces (cost estimate – up to \$1,000)

 Secure all weather mats with industrialstrength double-stick tape. Alternatively, replace them with recessed walk-off mats or grates.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Floor Surfaces.

Work Surfaces (cost estimate – up to \$1,000)

1. Ensure that at least one of each work surface is accessible.

For additional information, please see Part E – ADA/MAAB References – Built-In Elements for Work Surfaces.

Stairways (cost estimate – up to \$10,000)

- 1. Install compliant handrails on both sides of the egress stairway.
- 2. Develop policies and procedures to evacuate individuals unable to navigate stairs.

For additional information, please see Part E – ADA/MAAB References – Scoping for Emergency Egress and General Site and Building Elements for Stairways.

Signage (cost estimate – up to \$10,000)

 Implement a comprehensive signage plan to ensure that ADA-compliant signs are installed alongside all doors to identify permanent rooms and spaces.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 3 – Toilet Rooms

Toilet Rooms (cost estimate – up to \$25,000)

 Modify the multi-user toilet rooms inside the Senior Center or establish a single-user accessible toilet room in the facility.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Toilet and Bathing Rooms.

Signage (cost estimate – up to \$1,000)

Install accessible signage at all toilet rooms.
 Where toilet rooms are inaccessible,
 signage should direct residents to the
 closest accessible toilet room in the facility.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 4 – Additional Access

Kitchenettes

(cost estimate – TBD depending on scope)

- Short Term: Ensure policies are developed to address employee accommodation requests.
- Long Term: As kitchenettes are replaced, ensure that replacements meet all ADA/MAAB requirements.

For additional information, please see Part E – ADA/MAAB References – Special Rooms, Spaces and Elements for Kitchens and Kitchenettes.

Thermostats (cost estimate – up to \$1,000)

1. In the Senior Center on the first floor, lower the two thermostats so that they are no higher than 48 inches above the floor.





DPW Building

M4 - DPW Building

Building Description

Located at 1 Franey Road, the Department of Public Works building is a three-story, split level brick structure built between the Lowell Line commuter rail tracks and Trum Park.

The building has entrances on three sides – in the front on Franey Road, on the side along the driveway, and at the rear along the parking lot. Neither of the entrances is accessible since stairways are provided to the first floor about six feet above the exterior grade.

No off-street public parking is offered in this facility. Staff parking is provided on Francy Street along Trum Park and in the parking lot behind the building. No accessible parking spaces for public or staff were identified in this facility.

At two entrances (side and rear), egress stairways offer vertical circulation to all floor levels. Neither stairway has compliant handrails. No elevator is provided in this facility.

Toilet rooms for staff and public use are located on the first and second floors only. Neither toilet rooms are accessible.

Services to public are offered on all floor levels, including the basement. Most areas used for business transactions with the public have counters that exceed the maximum allowable height.

Structural Accessibility

While the building was designed and built prior to state and federal accessibility regulations the City has ongoing obligations for accessibility:

The City must ensure that students and the public can access the programs, services and activities at DPW Building.

Aside from modifying policies and procedures to ensure programmatic access, this also means:

- Elements that were previously modified or not constructed in compliance with code must be corrected to current standards;
- As alterations and renovations are undertaken, elements that are not accessible must be brought into compliance with current 521CMR and 2010 ADA Standards:
- Building elements that are inaccessible as a result of new standards adopted since they were built, need to be brought into compliance if they are a barrier to equal participation in programs, services and activities offered.



Photo 1



Photo 2



Photo 3

Issues

Priority 1 - Approach & Entrance

Parking & Drop-off Area

Twenty-minute visitor parking is offered adjacent to the DPW building on Franey Road. Parking reserved for staff is offered along Trum Field on Franey Road and in the parking lot behind the building (Photo 1). No accessible parking spaces for visitors or staff as well as a drop-off area were provided at this facility.

Sidewalks and Curb Ramps

The main entrance to the DPW building is directly connected to the sidewalk along Franey Road. In certain areas of the sidewalk, deteriorated surface can become tripping hazards to the public and staff. (Photo 2)

Entrances

The building has entrances on three sides – in the front on Franey Road, on the side along the driveway, and at the rear along the parking lot. Neither entrance is accessible since stairways with non-compliant handrails are provided to the first floor about six feet above the exterior grade. (Photo 3)



Photo 4



Photo 5



Photo 6

Priority 2 - Access to Goods & Services

Doors

Throughout the building, several single- and double-leaf doors exceed the maximum allowable force required to open them and do not have the minimum clear width for accessible doors. Additionally, numerous doors have non-compliant hardware and do not have the minimum maneuvering clearance required to open them. (Photo 4)

Floor Surfaces

At all entrances as well as other circulation areas within the building, several weather mats are not secure and can become tripping hazards to visitors and staff. (Photo 5)

Protruding Objects

Throughout the circulation path in the building, hazardous protruding objects increase the possibility of injury to visitors and staff. Protruding objects include, but are not limited to, the following:

- automatic external defibrillator in the corridor on the second floor; (Photo 6)
- fire extinguisher the corridor in the basement;
- underside of both egress stairways in the basement:
- air conditioner mounted on the window of the Fire Prevention Bureau.

Sale & Service Counters

At the Inspectional Services and Engineering Departments on the first floor and Finances Department on the second floor, counters exceed the maximum allowable height for visitors who are of short stature. (Photo 7)



Photo 7



Photo 8



Photo 9

Stairways

At the main entrance (front), an internal stairway connects the street to the first floor while at the two other entrances (side and rear), egress stairways offer vertical circulation to all floor levels. Neither stairway has compliant handrails. (Photo 8)

Signage

While some signs have been updated in certain areas of the building, the remaining older signage is problematic because not all permanent rooms and spaces are properly identified with ADA-compliant signs. (Photo 9)



Photo 10



Photo 11



Photo 12

Priority 3 – Toilet Rooms

Toilet Rooms

Multi-user toilet rooms for staff and public use are located on the first and second floors. Neither toilet room is accessible since the spaces are too small and fixtures are not compliant. (Photos 10 & 11)

Signage

The toilet rooms near the rear entrance on the first floor do not have any signs to properly identify them while the toilet rooms near the side entrance on the first floor have signs on the doors. Although a few signs have been installed in certain toilet rooms, none of the toilet rooms in the building have accessible signage.

Furthermore, the inaccessible Women's toilet rooms located on the first floor is incorrectly identified with the International Symbol of Accessibility. (Photo 12)

Priority 4 - Additional Access

Kitchenette

The kitchenette on the second floor has not been renovated and lacks clear floor space and an accessible sink, among other items.

Recommendations

Priority 1 – Approach & Entrance

Parking & Drop-off Area (cost estimate – TBD depending on scope)

 Title II entities are not required to provide off-street public parking; however, if the entity decides to provide public parking then accessible parking must be provided.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and General Site and Building Elements for Accessible Parking.

Sidewalks and Curb Ramps (cost estimate – up to \$10,000)

1. Repair or replace broken or heaved sidewalk panels.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Accessible Routes and Curb Ramps.

Entrances

(cost estimate – TBD depending on scope)

- Residents who are unable to navigate stairways cannot access the programs, services, and activities at the DPW Building. Develop policies and procedures to accommodate persons unable to navigate stairways upon request.
- 2. Provide information online and at the main entrance advising how to obtain access to programs, services, and activities at the DPW Building;

For additional information, please see Program Accessibility.

Priority 2 – Access to Goods & Services

Doors (cost estimate – up to \$5,000)

- When doors do not have the minimum clear width for accessible doors, either keep them open during regular hours or replace them with wider doors;
- 2. Replace door knobs with lever hardware;
- Create a comprehensive maintenance program and schedule to check and adjust the opening force of all exterior and interior doors. Where not possible, either keep heavy doors open during regular hours or add automatic openers;
- Provide an automatic opener wherever doors do not have the required maneuvering clearance on their latch side. Prioritize entry doors and doors to toilet rooms.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Doors, Doorways, and Gates.

Floor Surfaces (cost estimate – up to \$1,000)

 Secure all weather mats with industrialstrength double-stick tape. Alternatively, replace them with recessed walk-off mats or grates.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Floor Surfaces.

Protruding Objects (cost estimate – up to \$1,000)

 Install cane-detectable barriers to protect all protruding objects, including the underside of both egress stairways in the basement and the air conditioner mounted on the window of the Fire Prevention Bureau. Cane-detectable barriers could be trash cans, fixed panels, furniture, or other permanent barriers.

For additional information, please see Part E – ADA/MAAB References – Building Blocks for Protruding Objects.

Sales and Service Counters (cost estimate – up to \$5,000)

- Short term: Provide an auxiliary counter with a maximum height of 36 inches in close proximity to the main counter, or provide equivalent facilitation. Equivalent facilitation may be provided in the form of a folding shelf attached to the main counter, an auxiliary table nearby, a clipboard made available to the public, or other means.
- 2. Long Term: Prioritize the installation of accessible counters at high traffic areas.

For additional information, please see Part E – ADA/MAAB References – ADA Reference – Built-in Elements for Sales and Service Counters.

Stairways (cost estimate – up to \$10,000)

- 1. Install compliant handrails on both sides of all internal and egress stairways;
- 2. Develop policies and procedures to evacuate individuals unable to navigate stairs:

For additional information, please see Part E – ADA/MAAB References – Scoping for Emergency Egress and General Site and Building Elements for Stairways.

Signage (cost estimate – up to \$10,000)

 Implement a comprehensive signage plan to ensure that ADA-compliant signs are installed alongside all doors to identify permanent rooms and spaces.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 3 – Toilet Rooms

Toilet Rooms (cost estimate – up to \$25,000)

 Modify at least one male and female toilet room or establish a single-user accessible toilet room in the facility.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Toilet and Bathing Rooms.

Signage (cost estimate – up to \$1,000)

Install accessible signage at all toilet rooms.
 Where toilet rooms are inaccessible,
 signage should direct residents to the
 closest accessible toilet room in the facility.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 4 - Additional Access

Kitchenette

(cost estimate - TBD depending on scope)

- Short Term: Ensure policies are developed to address employee accommodation requests.
- Long Term: As kitchenettes are replaced, ensure that replacements meet all ADA/MAAB requirements.

For additional information, please see Part E – ADA/MAAB References – Special Rooms, Spaces and Elements for Kitchens and Kitchenettes.





Recreation Building

M5 - Recreation Building

Building Description

Located directly across from Walnut Street Park, the Recreation building (former District Court of Somerville) is a three-story brick structure on a hilly slope. The building houses the Recreation Commission with recreational spaces for toddlers in the basement, office spaces on the first floor, and meeting rooms on the second floor. The building is completely inaccessible.

No off-street public parking is offered in this facility. Staff parking is provided on the driveway besides the building. No accessible parking spaces for public or staff were identified in this facility.

The building has entrances on two sides – in the front on Walnut Street and on the side along the driveway. Neither entrance is accessible since stairways provide access to both the first floor and basement level.

Toilet rooms for staff and public use are located on the first floor and the basement level.

Neither toilet room is accessible.

Structural Accessibility

While the building was designed and built prior to state and federal accessibility regulations it is completely inaccessible. Thus, the City has significant ongoing obligations for accessibility:

The City must ensure that the public can access the programs, services and activities offered at the Recreation Building.

Aside from modifying policies and procedures to ensure programmatic access, this also means:

- Elements that were previously modified or not constructed in compliance with code must be corrected to current standards;
- As alterations and renovations are undertaken, elements that are not accessible must be brought into compliance with current 521CMR and 2010 ADA Standards;
- Building elements that are inaccessible as a result of new standards adopted since they were built, need to be brought into compliance if they are a barrier to equal participation in programs, services and activities offered.



Photo 1



Photo 2



Photo 3

Issues

Priority 1 – Approach & Entrance

Parking & Drop-off Area

No off-street public parking is offered in this facility. Staff parking is provided on the driveway besides the building. No accessible parking spaces for public or staff as well as a drop-off area were identified in this facility.

Sidewalks and Curb Ramps

The entrances to the Recreation building are directly connected to the sidewalk along Walnut Street and the driveway. In certain areas of the sidewalk and driveway, deteriorated surface can become tripping hazards to the public and staff. (Photo 1)

Entrances

The building has entrances on two sides – in the front on Walnut Street and on the side along the driveway. Neither entrance is accessible since stairways are provided to both the first floor and basement level. The main entrance has stairs leading to the door and further stairs once inside. For the side entrance, a single exterior step leads to several interior steps. (Photos 2 & 3)

A confusing sign with the International Symbol of Accessibility and arrow directing towards the front entrance is mounted on the side entry door. (Photo 3)

At the rear of the building, an at-grade door is used for exit on the basement level.



Photo 4



Photo 5



Photo 6

Priority 2 – Access to Goods & Services

Doors

Throughout the building, several single- and double-leaf doors exceed the maximum allowable force required to open them and do not have the minimum clear width for accessible doors. Additionally, numerous doors have non-compliant hardware and do not have the minimum maneuvering clearance required to open them. (Photo 4)

Floor Surfaces

At the main entrance as well as other circulation areas within the first floor, several weather mats are not secure and can become tripping hazards to visitors and staff. (Photo 5)

Changes in Level

Near the exit door on the basement level, a tall step is located between the classroom and the exit corridor and a short step is located inside the rear vestibule. Additionally, many items stored within the rear vestibule may impede the safe egress of building occupants with disabilities. (Photo 5)

Sale & Service Counters

Inside the Recreation Commission office on the first floor, a counter exceeds the maximum allowable height for visitors who are of short stature. (Photo 7)



Photo 7



Photo 8



Photo 9

Stairways

At both entrances, internal stairways connect the street to both the first floor and the basement level. Additionally, an egress stairway offers vertical circulation to all floor levels. Neither stairway has compliant handrails. (Photo 8)

Signage

Very little signage is provided at this facility and not all permanent rooms and spaces are properly identified with ADA-compliant signs. (Photo 9)



Photo 10



Photo 11



Photo 12

Priority 3 – Toilet Rooms

Toilet Rooms

Two single-user toilet rooms for staff and public use are provided at this facility – one on the first floor, the other in the basement. The toilet room on the first floor is completely inaccessible. (Photo 10)

Although the toilet room in the basement offers a few accessible features, plumbing underneath the lavatories is not protected for people using wheeled mobility devices and wall-mounted accessories (such as soap and paper towel dispensers) exceed the maximum allowable height or are obstructed by trash cans. (Photo 11)

Signage

Neither toilet room has any signs to properly identify them. (Photo 12)

Priority 4 – Additional Access

No additional access, such as drinking fountains and public phones were found in this facility.

Recommendations

Priority 1 – Approach & Entrance

Parking & Drop-off Area (cost estimate – TBD depending on scope)

 Title II entities are not required to provide off-street public parking; however, if the entity decides to provide public parking then accessible parking must be provided.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and General Site and Building Elements for Accessible Parking.

Sidewalks and Curb Ramps (cost estimate – up to \$5,000)

1. Repair or replace broken or heaved sidewalk panels.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Accessible Routes and Curb Ramps.

Entrances

(cost estimate – TBD depending on scope)

- Remove the confusing sign with the International Symbol of Accessibility mounted on the side entry door.
- 2. Study the feasibility of using the rear atgrade door as the accessible entrance to the basement level.
- Residents who are unable to navigate stairways cannot access the programs, services, and activities at the Recreation Building. Develop policies and procedures to accommodate persons unable to navigate stairways upon request.
- Provide information online and at the main entrance advising how to obtain access to programs, services, and activities at the Recreation Building.

For additional information, please see Program Accessibility.

Priority 2 – Access to Goods & Services

Doors (cost estimate – up to \$5,000)

- When doors do not have the minimum clear width for accessible doors, either keep them open during regular hours or replace them with wider doors.
- 2. Replace door knobs with lever hardware.
- Create a comprehensive maintenance program and schedule to check and adjust the opening force of all exterior and interior doors. Where not possible, either keep heavy doors open during regular hours or add automatic openers.
- Provide an automatic opener wherever doors do not have the required maneuvering clearance on their latch side. Prioritize entry doors and doors to toilet rooms.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Doors, Doorways, and Gates.

Floor Surfaces (cost estimate – up to \$1,000)

 Secure all weather mats with industrialstrength double-stick tape. Alternatively, replace them with recessed walk-off mats or grates.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Floor Surfaces.

Changes in Level (cost estimate – up to \$5,000)

- Remove all items stored within the rear vestibule of the exit door on the basement level.
- 2. Study the feasibility of eliminating the steps leading to the exit door.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Floor Surfaces.

Sales and Service Counters (cost estimate – up to \$1,000)

- Short term: Provide an auxiliary counter with a maximum height of 36 inches in close proximity to the main counter, or provide equivalent facilitation. Equivalent facilitation may be provided in the form of a folding shelf attached to the main counter, an auxiliary table nearby, a clipboard made available to the public, or other means.
- 2. Long Term: Provide an accessible counter inside the Recreation Commission office on the first floor.

For additional information, please see Part E – ADA/MAAB References – ADA Reference – Built-in Elements for Sales and Service Counters.

Stairways

(cost estimate – up to \$5,000)

- 1. Install compliant handrails on both sides of all internal and egress stairways.
- Develop policies and procedures to evacuate individuals unable to navigate stairs.

For additional information, please see Part E – ADA/MAAB References – Scoping for Emergency Egress and General Site and Building Elements for Stairways.

Signage (cost estimate – up to \$5,000)

 Implement a comprehensive signage plan to ensure that ADA-compliant signs are installed alongside all doors to identify permanent rooms and spaces.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 3 – Toilet Rooms

Toilet Rooms (cost estimate – up to \$1,000)

- Make the following improvements to the single-user toilet room on the basement level:
 - a. Protect the plumbing underneath the lavatory.
 - b. Lower wall-mounted accessories and remove trash cans below them.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Toilet and Bathing Rooms.

Signage (cost estimate – up to \$1,000)

Install accessible signage at all toilet rooms.
 Where toilet rooms are inaccessible,
 signage should direct residents to the
 closest accessible toilet room in the facility.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.





SCAT Building

M6 - SCAT Building

Building Description

Located at the intersection of Somerville Avenue and Prospect Street, the SCAT building is a two-story brick structure with a public access TV station and meeting rooms on the first floor and a non-profit organization on the second floor.

As a former fire station, the building has one atgrade entrance between Somerville Avenue and the public parking lot off Prospect Street.

Off-street public parking is offered adjacent to this facility but is shared with surrounding businesses. Though adjacent, this meteredparking does not offer any accessible parking spaces reserved for SCAT public or staff.

Toilet rooms for staff and public use are located on the first floor and are mostly accessible.

August 12, 2013

Structural Accessibility

While the building was designed and built prior to state and federal accessibility regulations and has undergone some accessibility upgrades, the City has ongoing obligations for accessibility:

The City must ensure that the public can access the programs, services and activities at the SCAT building.

Aside from modifying policies and procedures to ensure programmatic access, this also means:

- Elements that were previously modified or not constructed in compliance with code must be corrected to current standards;
- As alterations and renovations are undertaken, elements that are not accessible must be brought into compliance with current 521CMR and 2010 ADA Standards;
- Building elements that are inaccessible as a result of new standards adopted since they were built, need to be brought into compliance if they are a barrier to equal participation in programs, services and activities offered.



Photo 1



Photo 2



Photo 3

Issues

Priority 1 - Approach & Entrance

Parking & Drop-off Area

No off-street public parking or drop-off area is dedicated to this facility. Metered-parking is provided on the adjacent public parking lot, which does not offer any accessible parking spaces for public or staff – for more information on this parking facility, please refer to the report for parking lots.

Sidewalks and Curb Ramps

The main entrance to the SCAT building is directly connected to the sidewalks along Somerville Avenue and Prospect Street. In certain areas of the sidewalk, deteriorated surface can become tripping hazards to the public and staff. (Photo 1)

Entrances

The building has one at-grade entrance between Somerville Avenue and the public parking lot off Prospect Street. Although this entrance may be used by people using wheeled mobility devices, a few issues were identified: the doorbell exceeds the maximum allowable height, the granite threshold is a tripping hazard, and the concrete curb at the edge of the building obstructs the maneuvering clearance of the door. (Photo 2)

Other doors can be found at other sides of the building, but none of them are located on an accessible route and most connect to stairways. (Photo 3)



Photo 4



Photo 5



Photo 6

Priority 2 - Access to Goods & Services

Doors

At the entry vestibule, both doors do not have the minimum maneuvering clearance required to open them – the exterior door is obstructed by a wall and the interior doors by a coat rack. (Photos 4 and 5)

Inside toilet rooms, the lavatory obstructs the minimum maneuvering clearance required to open the door.

Floor Surfaces

At the entry vestibule, weather mats are not secure and can become tripping hazards to customers and staff. (Photo 5)

Protruding Objects

In the corridor near the reception area, a wall-mounted fire extinguisher increases the possibility of injury to customers and staff. (Photo 6)



Photo 7



Photo 8



Photo 9

Stairways

Two stairways can be found away from the building entrance. One stairway leads to an exit door and the other to a classroom about one foot above the first floor. Neither stairway has railings on both sides. (Photos 7 and 8)

Accessible Route

At the rear of the first floor, a classroom is inaccessible because it is located two steps above the main floor.

Signage

While some signs have been updated in certain areas of the building, the remaining older signage is problematic because not all permanent rooms and spaces are properly identified with ADA-compliant signs. (Photo 9)



Photo 10

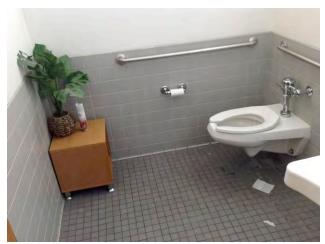


Photo 11



Photo 12

Priority 3 – Toilet Rooms

Toilet Rooms

Single-user toilet rooms (one for each gender) for staff and public use are located on the first floor. In both toilet rooms, the lavatory obstructs the minimum maneuvering clearance required to open the door, plumbing underneath the lavatories is not protected for people using wheeled mobility devices. Additionally, mirrors, coat hooks, and wall-mounted accessories (such as soap and paper towel dispensers) exceed the maximum allowable height. (Photo 10)

In the Women's toilet room, furniture obstructs the maneuvering clearance in the toilet room. (Photo 11)

Signage

None of the toilet rooms in the building have accessible signage. (Photo 12)



Photo 13

Priority 4 – Additional Access

Drinking Fountain

Although a drinking fountain is provided near the toilet room, it does not offer knee clearance for forward approach for those using wheeled mobility devices. However, an adjacent water cooler provides equivalent access. (Photo 13)

Recommendations

Priority 1 - Approach & Entrance

Parking & Drop-off Area (cost estimate – TBD depending on scope)

 Title II entities are not required to provide off-street public parking; however, if the entity decides to provide public parking then accessible parking must be provided.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and General Site and Building Elements for Accessible Parking.

Sidewalks and Curb Ramps (cost estimate – up to \$10,000)

1. Repair or replace broken or heaved sidewalk panels.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Accessible Routes and Curb Ramps.

Entrances (cost estimate – up to \$10,000)

- 1. Lower the doorbell no more than 48 inches above the ground.
- 2. Re-grade the concrete landing adjacent to the entry door so that the exterior grade is flush with the granite threshold.
- 3. Install an automatic door opener on the exterior of entry door.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Doors, Doorways, and Gates.

Priority 2 – Access to Goods & Services

Doors (cost estimate – up to \$5,000)

- Install an automatic door opener on the interior of entry door and inside both singleuser toilet rooms.
- Remove the coat rack blocking the clear floor space on the latch pull side of the vestibule door.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Doors, Doorways, and Gates.

Floor Surfaces (cost estimate – up to \$1,000)

 Secure all weather mats at the entry vestibule with industrial-strength doublestick tape. Alternatively, replace them with recessed walk-off mats or grates.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Floor Surfaces.

Protruding Objects (cost estimate – up to \$1,000)

 Install cane-detectable barriers to protect the wall-mounted fire extinguisher in the corridor near the reception. Cane-detectable barriers could be trash cans, fixed panels, furniture, or other permanent barriers.

For additional information, please see Part E – ADA/MAAB References – Building Blocks for Protruding Objects.

Stairways (cost estimate – up to \$5,000)

 Install compliant handrails on both sides of the two stairways found away from the building entrance.

For additional information, please see Part E – ADA/MAAB References – Scoping for Emergency Egress and General Site and Building Elements for Stairways.

Accessible Route (cost estimate – TBD depending on scope)

 Residents who are unable to navigate stairways cannot access the programs, services, and activities at the classroom at the rear of the first floor. Develop policies and procedures to accommodate persons unable to navigate stairways upon request.

For additional information, please see Program Accessibility.

Signage (cost estimate – up to \$1,000)

 Implement a comprehensive signage plan to ensure that ADA-compliant signs are installed alongside all doors to identify permanent rooms and spaces.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 3 – Toilet Rooms

Toilet Rooms (cost estimate – up to \$1,000)

- In both single-user toilet rooms, protect plumbing underneath the lavatories, lower the mirror so that the reflective surface is no higher than 40 inches above the floor, and lower all coat hooks and wall-mounted accessories so that they are no higher than 48 inches above the floor.
- 2. Remove all furniture inside toilet rooms.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Toilet and Bathing Rooms.

Signage (cost estimate – up to \$1,000)

 Install accessible signage at both singleuser toilet rooms.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.





Traffic & Parking

M7 - Traffic & Parking

Building Description

Located at the intersection of Holland and Paulina Streets, the Traffic & Parking building is a two-story, split level brick structure with public and staff spaces on the first floor.

The building has one public entrance on Holland Street and a service entrance at the rear along the parking lot. At the public entrance, a stairway leads to the upper floor about five feet above the exterior grade. A noncompliant inclined lift with an expired certificate for use is provided at this entrance. At the service entrance, a non-compliant ramp is provided. No elevator is provided in this facility.

No off-street public parking is offered in this facility. Staff parking is provided in the parking lot behind the building. No accessible parking spaces for public or staff were identified in this facility.

Services to the public are offered on the first floor, in an area adjacent to Holland Street. No toilet rooms for public use are provided in the public area of this facility. Toilet rooms for staff use located near the service entrance are mostly accessible.

Structural Accessibility

While it was designed and built prior to state and federal accessibility regulations and has undergone some accessibility upgrades, the City has ongoing obligations for accessibility:

The City must ensure that the public can access the programs, services and activities at Traffic & Parking.

Aside from modifying policies and procedures to ensure programmatic access, this also means:

- Elements that were not constructed in compliance with code must be corrected to current standards.
- As alterations and renovations are undertaken, elements that are not accessible must be brought into compliance with current 521CMR and 2010 ADA Standards.
- Building elements that are inaccessible as a result of new standards adopted since they were built, need to be brought into compliance if they are a barrier to equal participation in programs, services and activities offered.



Photo 1



Photo 2



Photo 3

Issues

Priority 1 - Approach & Entrance

Parking & Drop-off Area

No accessible parking spaces for public or staff as well as a drop-off area were identified in this facility.

Sidewalks and Curb Ramps

The public entrance to the Traffic & Parking building is directly connected to the sidewalk along Holland and Paulina Streets. In certain areas of the sidewalk, deteriorated surface can become tripping hazards to the public and staff. (Photo 2)

Entrances

The building has one public entrance on Holland Street and a service entrance at the rear along the parking lot. At the public entrance, a stairway leads to the upper floor about five feet above the exterior grade. An inclined lift with an expired certificate for use is provided at this entrance. This lift cannot be independently operated by customers as a key is required to unlock the device. A sign with the words 'physically challenged customers please ring bell for service' indicates the location of the buzzer used to alert the staff. (Photo 3)

At the service entrance, a non-compliant ramp connects the parking lot behind the building and the first floor.



Photo 4



Photo 5



Photo 6

Priority 2 - Access to Goods & Services

Doors

Throughout the building, several doors exceed the maximum allowable force required to open them and do not have the minimum clear width for accessible doors. Additionally, numerous doors have non-compliant hardware and do not have the minimum maneuvering clearance required to open them. (Photo 4)

Floor Surfaces

At the public entrance as well as the lobby and other circulation areas within the building, several weather mats are not secure and can become tripping hazards to customers and staff. (Photo 5)

Protruding Objects

At the lobby, stanchions and ropes used to block access into the staff area increase the possibility of injury to customers and staff. (Photo 6)

Sale & Service Counters

At the lobby, one counter meets the allowable height for customers using wheeled mobility devices or who are of short stature. However, the counter does not offer enough clearance underneath to allow a forward approach for customers using a wheelchair or powerchair. (Photo 7)



Photo 7

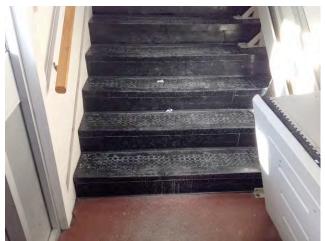


Photo 8



Photo 9

Stairways

At the public entrance, an internal stairway connects the street to the first floor. Not only does the inclined lift obstruct one side of the stairway but also the railing provided on the other side is not compliant. (Photo 8)

Signage

While some signs have been updated in certain areas of the building, the remaining older signage is problematic because not all permanent rooms and spaces are properly identified with ADA-compliant signs. (Photo 9)



Photo 10



Photo 11

Priority 3 – Toilet Rooms

Toilet Rooms

No toilet rooms for public use are provided in the public area of this facility. Toilet rooms for staff use located near the service entrance are mostly accessible. In both toilet rooms, plumbing underneath the lavatories is not protected for people using wheeled mobility devices and the toilet paper dispensers inside the toilet stalls are not correctly placed. Additionally, in the Men's toilet room, the flush valve is placed at the incorrect side of the toilet and the side grab bar is not mounted on a coplanar surface. (Photos 10 & 11)

Signage

Although signs have been installed on the doors of the toilet rooms for staff use, none of the toilet rooms have accessible signage. (Photo 12)



Photo 12

Priority 4 – Additional Access

No additional access, such as drinking fountains and public phones were found in this facility.

Recommendations

Priority 1 – Approach & Entrance

Parking & Drop-off Area (cost estimate – TBD depending on scope)

 Title II entities are not required to provide off-street public parking; however, if the entity decides to provide public parking then accessible parking must be provided.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and General Site and Building Elements for Accessible Parking.

Sidewalks and Curb Ramps (cost estimate – up to \$5,000)

1. Repair or replace broken or heaved sidewalk panels.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Accessible Routes and Curb Ramps.

Entrances (cost estimate – up to \$25,000)

- 1. At the public entrance, remove the inclined stair lift and install compliant railings on both sides of the stairway to the lobby.
- 2. Add an accessible ramp to the service entrance at the rear of the building.
- Provide a sign at the Holland Street entrance to direct customers using wheeled mobility devices or those who cannot navigate stairways to the new accessible entrance.
- At the new accessible entrance, provide an intercom to alert employees that a customer needs assistance.

For additional information, please see Program Accessibility.

Priority 2 – Access to Goods & Services

Doors (cost estimate – up to \$5,000)

- When doors do not have the minimum clear width for accessible doors, either keep them open during regular hours or replace them with wider doors.
- 2. Replace door knobs with lever hardware.
- Create a comprehensive maintenance program and schedule to check and adjust the opening force of all exterior and interior doors. Where not possible, either keep heavy doors open during regular hours or add automatic openers.
- Provide an automatic opener wherever doors do not have the required maneuvering clearance on their latch side. Prioritize entry doors and doors to toilet rooms.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Doors, Doorways, and Gates.

Floor Surfaces (cost estimate – up to \$1,000)

 Secure all weather mats with industrialstrength double-stick tape. Alternatively, replace them with recessed walk-off mats or grates.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Floor Surfaces.

Evaluation of Facilities – Traffic & Parking

Protruding Objects (cost estimate – up to \$1,000)

 Replace stanchions and ropes with ADAcompliant ones.

For additional information, please see Part E – ADA/MAAB References – Building Blocks for Protruding Objects.

Sales and Service Counters (cost estimate – up to \$1,000)

1. At the lobby, modify the lower counter so that the clearance underneath is at least 27 inches above the floor.

For additional information, please see Part E – ADA/MAAB References – ADA Reference – Built-in Elements for Sales and Service Counters.

Stairways (cost estimate – up to \$1,000)

1. Install compliant handrails on both sides of the internal stairways at the public entrance.

For additional information, please see Part E – ADA/MAAB References – Scoping for Emergency Egress and General Site and Building Elements for Stairways.

Signage (cost estimate – up to \$5,000)

Implement a comprehensive signage plan to ensure that ADA-compliant signs are installed alongside all doors to identify permanent rooms and spaces.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 3 – Toilet Rooms

Toilet Rooms (cost estimate – up to \$5,000)

1. Modify both multi-user toilet rooms.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Toilet and Bathing Rooms.

Signage (cost estimate – up to \$1,000)

1. Install accessible signage at all toilet rooms.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.





Tufts Administration Building

M8 – Tufts Administration Building

Building Description

Located on Holland Street and adjacent to the Powderhouse Community School, the Tufts Administration Building is a three-story brick structure with public and staff spaces on all floors. Although not a City-owned facility, programs, services, and activities are offered on portions of the first and second floors of this facility.

The building has one at-grade public entrance on Holland Street. A drop-off area and off-street public parking is offered in the parking lot along Holland Street. Although five accessible parking spaces were identified near the accessible entrance, one of them is missing the require access aisle. Additionally, no designated van parking spaces were identified in this facility.

An elevator and at least four egress stairways connecting all floor levels are provided in this facility. The Somerville Council on Aging and the office of the Somerville ADA Coordinator are found on the second floor while offices and classrooms for SCALE, the Somerville Center for Adult Learning Experiences, are located on the first floor.

Partially accessible multi-user toilet rooms for staff and public use are provided on all floors of this facility.



Photo 1



Photo 2



Photo 3

Issues

Priority 1 - Approach & Entrance

Parking & Drop-off Area

Accessible parking spaces for public or staff as well as a drop-off area are provided near the accessible entrance on Holland Street.

Although five accessible parking spaces were identified, the closest one to the entrance is missing the require access aisle. Additionally, one designated van parking space was not identified in this facility. (Photo 1)

Sidewalks and Curb Ramps

The public entrance to the Tufts Administration Building is directly connected to the sidewalk along Holland Street and walkways along the parking lot. In certain areas of the walkway, deteriorated surface can become tripping hazards to the public and staff. Additionally, curb ramps without a level landing at the top and parked vehicles obstruct the minimum clear width of the accessible route to the entrance. (Photos 2 and 3)



Photo 4



Photo 5



Photo 6

Priority 2 - Access to Goods & Services

Doors

Throughout the building, several doors exceed the maximum allowable force required to open them. Additionally, several doors to classrooms and exit corridors have non-compliant hardware and do not have the minimum maneuvering clearance required to open them. (Photo 4)

Protruding Objects

Throughout the circulation path in the building, hazardous protruding objects increase the possibility of injury to visitors and staff.

Protruding objects include, but are not limited to, the following:

- overhead signs along the corridors serving SCALE on the first floor;
- underside of the interior stairway on the first floor. (Photo 5)

Signage

While numerous signs have been updated in most areas of the building, not all permanent rooms and spaces are properly identified with ADA-compliant signs. (Photo 6)



Photo 10



Photo 11



Photo 12

Priority 3 – Toilet Rooms

Toilet Rooms

One set of multi-user toilet rooms (one or each gender) for public and staff use are provided on the first and second floors. In all toilet rooms, plumbing underneath the lavatories is not protected for people using wheeled mobility devices and grab bars inside accessible stalls do not meet the minimum allowable height. (Photos 10 & 11)

Signage

Although compliant signs have been installed on or near the doors do the toilet rooms on the second floor, they are not correctly place on the latch side of the doors. (Photo 12)

Toilet rooms on the first floor are not identified with accessible signage



Photo 13



Photo 14



Photo 15

Priority 4 - Additional Access

Drinking Fountain

Drinking fountains on all floor levels are inaccessible because they are located in constricted recesses that reduce clear space substantially. An accessible alternative water cooler is not provided. (Photos 13 and 14)

Kitchenette

The kitchenette on the second floor has not been renovated and lacks clear floor space and an accessible sink, among other items. (Photo 14)

Pay Phone

At the entry lobby, a public pay phone lacks signage indicating availability of TDD/TTY, nor was a TDD/TTY found. (Photo 15)

Outdoor Amenities

At the main entrance, exterior benches, seating, and tables are provided and frequently used; however, none are accessible.

Recommendations

Priority 1 – Approach & Entrance

Parking & Drop-off Area (cost estimate – up to \$5,000)

- Remove the parking space closest to the entrance and enlarge the access aisle to 96-inch wide.
- 2. Install wheel stops on each accessible parking space along the walkway that leads to the accessible entrance.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and General Site and Building Elements for Accessible Parking.

Sidewalks and Curb Ramps (cost estimate – up to \$10,000)

- 1. Repair or replace all degraded walking surfaces, including the concrete walkways and brick walkway near the entrance.
- 2. Replace curb ramps adjacent to parking.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Accessible Routes and Curb Ramps.

Priority 2 – Access to Goods & Services

Doors (cost estimate – up to \$10,000)

- Create a comprehensive maintenance program and schedule to check and adjust the opening force of all exterior and interior doors. Where not possible, either keep heavy doors open during regular hours or add automatic openers.
- 2. Replace door knobs with lever hardware.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Doors, Doorways, and Gates.

Protruding Objects (cost estimate – up to \$5,000)

- Install a cane-detectable barrier to protect the underside of interior stairway on the first floor. Cane-detectable barriers could be trash cans, fixed panels, furniture, or other permanent barriers.
- 2. Raise overhead signs so that an 80-inch headroom is maintained along the corridors serving SCALE on the first floor.

For additional information, please see Part E – ADA/MAAB References – Building Blocks for Protruding Objects.

Signage (cost estimate – up to \$25,000)

 Implement a comprehensive signage plan to ensure that ADA-compliant signs are installed alongside all doors to identify permanent rooms and spaces.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 3 – Toilet Rooms

Toilet Rooms (cost estimate – up to \$25,000)

 Modify all multi-user toilet rooms by protecting plumbing underneath the lavatories and raise grab bars inside toilet stalls so that they are mounted between 33 inches and 36 inches above the floor. IHCD can provide schematic designs for these renovations.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Toilet and Bathing Rooms.

Signage (cost estimate – up to \$1,000)

Install accessible signage at all toilet rooms.
 Where toilet rooms are inaccessible,
 signage should direct residents to the
 closest accessible toilet room in the facility.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 4 - Additional Access

Drinking Fountain (cost estimate – up to \$1,000)

 Either provide an accessible drinking fountain or provide an adjacent water cooler with cups for equivalent access at the inaccessible drinking fountain.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Drinking Fountains.

Kitchenette

(cost estimate – TBD depending on scope)

- Short Term: Ensure policies are developed to address employee accommodation requests.
- Long Term: As kitchenettes are replaced, ensure that replacements meet all ADA/MAAB requirements.

For additional information, please see Part E – ADA/MAAB References – Special Rooms, Spaces and Elements for Kitchens and Kitchenettes.

Pay Phone (cost estimate – up to \$1,000)

- 1. If no TTY is provided, acquire and install one.
- At pay phone, install accessible signage directing to the TTY. Note that the TTY must be accessible and available whenever the payphone is operable.

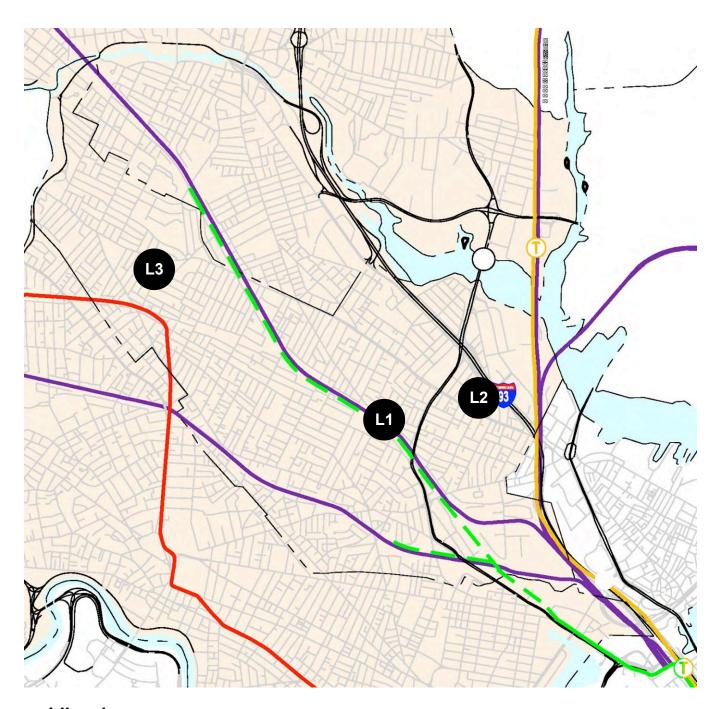
For additional information, please see Part C – ADA/MAAB References – Communication Elements and Features for Telephones.

Outdoor Amenities (cost estimate – up to \$5,000)

1. Provide at least one accessible exterior table.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements for Dining Surfaces and Work Surfaces.





Libraries

- L1 Central
- L2 East Branch
- L3 West Branch





Central Library

L1 - Central Library

Building Description

Located at the intersection of Highland Avenue and Walnut Street, the Central Library is a four-story, brick structure abutting Central Hill Park, the High School gym, and the Lowell Line commuter rail tracks.

The building has an at-grade public entrance in the front on Highland Avenue and a stepped service entrance at the rear along the parking lot. Automatic door openers are provided at the public entrance and exit. Walkways lead from the entrance to the High School, adjacent park and playground, and stepped walkways to Walnut Street.

Off-street public parking is offered in this facility and is shared with the adjacent playground and High School gym. Staff parking is provided in the parking lot behind the building. No accessible parking spaces for public or staff were identified in this facility.

Toilet rooms for staff and public use are located on the first and second floors only. Neither toilet rooms are accessible.

Services to public are offered on all floor levels, including the basement. Most areas used for business transactions with the public have counters that exceed the maximum allowable height.

Structural Accessibility

While the building was designed and built prior to state and federal accessibility regulations and has undergone some accessibility upgrades, the City has ongoing obligations for accessibility:

The City must ensure that the public can access the programs, services and activities at the Central Library as well as the entire Library system and its website.

Aside from modifying policies and procedures to ensure programmatic access, this also means:

- Elements that were previously modified or not constructed in compliance with code must be corrected to current standards;
- As alterations and renovations are undertaken, elements that are not accessible must be brought into compliance with current 521CMR and 2010 ADA Standards;
- Building elements that are inaccessible as a result of new standards adopted since they were built, need to be brought into compliance if they are a barrier to equal participation in programs, services and activities offered.



Photo 1



Photo 2



Photo 3

Issues

Priority 1 – Approach & Entrance

Parking & Drop-off Area

Off-street staff and public parking was identified in parking lot adjacent to the building. Although one accessible van parking space for public is provided near the entrance, the required access aisle is missing. (Photo 1)

No drop-off area was identified in this facility.

Sidewalks and Curb Ramps

The entrance to the library is directly connected to the walkways that lead to the High School and the sidewalks along Highland Avenue and Walnut Street. Although the sidewalks are in reasonable condition, deteriorated surface within the walkways can become tripping hazards to the public and staff. (Photo 2) Further, some bricks are missing at the entrance and book drop.

The curb ramp adjacent to the accessible parking space has a lip exceeding one inch and the opposite curb ramp heading to the playground exceeds 10% of running slope.

The walkway to the corner of Highland Avenue and Walnut Street has steps without handrails and the accessible route lacks a level landing and is not maintained in the winter. Stairways down to Walnut Street and the rear surface driveway have handrails that are nonconforming and lack extensions.

Entrances

The building has one public at-grade entrance on Highland Avenue. This door, as well as the exit door next to it, is operated by an automatic door opener. (Photo 3)



Photo 4



Photo 5



Photo 6

Priority 2 – Access to Goods & Services

Doors

Throughout the building, several single- and double-leaf doors exceed the maximum allowable force required to open them and do not have the minimum clear width for accessible doors. In the single-user toilet rooms on the first floor, doors lack the minimum maneuvering clearance required to open them. Additionally, numerous doors have non-compliant hardware. (Photo 4)

Floor Surfaces

At all entrances as well as other circulation areas within the building, several weather mats are not secure and can become tripping hazards to visitors and staff.

Protruding Objects

On the circulation path on the mezzanine level, a fire extinguisher mounted on one bookshelf is a hazardous protruding object that increases the possibility of injury to visitors and staff. (Photo 5)

Sale & Service Counters

On the second floor, the circulation counter exceeds the maximum allowable height for visitors using wheeled mobility devices or who are of short stature. (Photo 6)



Photo 7



Photo 8

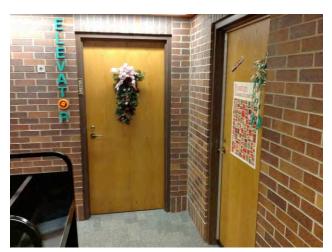


Photo 9

Interior Routes

Throughout the second floor and balcony, furniture and book stacks obstruct or narrow the accessible route and circulation paths to less than 36 inches of width. Additionally, residents using wheeled mobility devices may not be able to turn because of the limited amount of space between stacks and adjacent walls. (Photo 7) At the second floor, approximately 42 inches from the elevator door, there is a power plug protruding 3 inches above floor surface – staff strategically locates a rolling cart by it to discourage tripping. Finally, entering and exiting the elevator at the balcony is complicated by the narrow hallway.

Work Surfaces

Specific workstations such as those with computers do not provide the required knee and toe clearance.

Elevator

Though the elevator does not meet the minimum dimensional requirements of either 1991 or the current accessibility laws and regulations, the elevator provides a 32-inch wide door. Among non-compliant elevator code requirements, the elevator lacks an intercom, raised letters and Braille for buttons and the door timing is incorrect. Finally, in addition to the small cab, turning into or exiting the cab at the balcony level is difficult because of insufficient balcony width.

Signage

While some signs have been updated in a few areas of the building, the remaining older signage is problematic because not all permanent rooms and spaces are properly identified with ADA-compliant signs. (Photos 8 and 9)



Photo 10



Photo 11



Photo 12

Priority 3 – Toilet Rooms

Toilet Rooms

A set of single-user toilet rooms (one for each gender) for public use are located on the first floor. These amenities are kept locked and keys are provided at the circulation counter upon request. Both toilet rooms are inaccessible because the lavatories are too high, plumbing underneath lavatories are not protected, mirrors are not provided, faucets are non-compliant, and the approach to the toilet is obstructed by the lavatory. (Photo 10)

A set of single-use toilet rooms (one for each gender) for children use are located inside the Children's room on the first floor. Both toilet rooms are inaccessible because the doors are 28 inches wide, the plumbing underneath lavatories are not protected, faucets are noncompliant, grab bars are missing, and a wall-mounted changing station is located above the toilet. (Photo 11)

Additionally, a set of multi-user toilet rooms (one for each gender) for staff use are located on the basement level. Neither toilet rooms are accessible with insufficient maneuvering spaces, inaccessible stalls, urinals and lavatories.

Although these toilet rooms may have been code-compliant at the time of their installation in 1975, they do not meet the minimum requirements of either 1991 or the current accessibility laws and regulations.

Signage

Toilet rooms are not identified with accessible signage. (Photo 12)



Photo 13

Priority 4 – Additional Access

Drinking Fountain

The drinking fountain is an older style wall-mounted variety that is inaccessible. An accessible alternative water cooler is not provided. (Photo 13)

Kitchenette

The kitchenette has not been renovated and lacks clear floor space and an accessible sink, among other items. (Photo 14)

Outdoor Amenities

At the main entrance, exterior benches, seating, and checker/chess tables are provided and frequently used however none are accessible.

Recommendations

Priority 1 – Approach & Entrance

Parking & Drop-off Area (cost estimate – up to \$1,000)

 Provide a 96-inch wide access aisle adjacent to the accessible van space and reset sign post.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and General Site and Building Elements for Accessible Parking.

Sidewalks and Curb Ramps (cost estimate – up to \$50,000)

- Repair or replace all degraded walking surfaces, including the concrete walkways and brick walkway near the entrance.
- 2. Replace curb ramps adjacent to parking.
- Provide handrails and a level landing at the new walkway to corner of Highland and Walnut.
- 4. Plan for the replacement of handrails along stairways down to Walnut Street and the rear surface driveway.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Accessible Routes and Curb Ramps.

Priority 2 – Access to Goods & Services

Doors (cost estimate – up to \$5,000)

- Install automatic door openers on the single-user toilet rooms on the first floor, unless major structural work is undertaken to remove angled wall adjacent to doors.
- When doors do not have the minimum clear width for accessible doors, either keep them open during regular hours or replace them with wider doors.
- 3. Replace door knobs with lever hardware.
- 4. Create a comprehensive maintenance program and schedule to check and adjust the opening force of all exterior and interior doors. Where not possible, either keep heavy doors open during regular hours or add automatic openers.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Doors, Doorways, and Gates.

Floor Surfaces (cost estimate – up to \$1,000)

 Secure all weather mats with industrialstrength double-stick tape. Alternatively, replace them with recessed walk-off mats or grates.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Floor Surfaces.

Protruding Objects (cost estimate – up to \$1,000)

1. Relocate, recess, or install a canedetectable barrier to protect the fire extinguisher on the circulation path on the mezzanine. Cane-detectable barriers could be trash cans, fixed panels, furniture, or other permanent barriers.

For additional information, please see Part E – ADA/MAAB References – Building Blocks for Protruding Objects.

Sales and Service Counters (cost estimate – up to \$1,000)

- 1. Short term: Provide an auxiliary counter with a maximum height of 36 inches in close proximity to the main counter, or provide equivalent facilitation. Equivalent facilitation may be provided in the form of a folding shelf attached to the main counter, an auxiliary table nearby, a clipboard made available to the public, or other means.
- 2. Long Term: Provide an accessible circulation counter on the second floor.

For additional information, please see Part E – ADA/MAAB References - ADA Reference -Built-in Elements for Sales and Service Counters.

Interior Routes (cost estimate – up to \$5,000)

1. Relocate and or remove book stacks, stored items and articles from all circulation paths to ensure a 36-inch minimum clear width. Where paths intersect, ensure both routes are 36 inches minimum wide.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Accessible Routes.

Work Surfaces (cost estimate – up to \$5,000)

1. Ensure that at least one of each work surface housing technology, microfilm, etc. is accessible.

For additional information, please see Part E -ADA/MAAB References – Built-In Elements for Work Surfaces.

Elevator

(cost estimate – TBD depending on scope)

- 1. Upgrade intercom, control and hall call stations in accordance with both elevator and accessibility code requirements.
- 2. Undertake engineering study to evaluate enlarging the existing elevator and hoistway or install a new compliant elevator.

For additional information, please see Part E -ADA/MAAB References - Accessible Routes for Elevators.

Signage (cost estimate – up to \$10,000)

1. Implement a comprehensive signage plan to ensure that ADA-compliant signs are installed alongside all doors to identify permanent rooms and spaces.

For additional information, please see Part E -ADA/MAAB References - Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 3 - Toilet Rooms

Toilet Rooms (cost estimate – up to \$25,000)

 Modify both single-user toilet rooms on the first floor by relocating the lavatory near the door with dispensers and mirrors properly located and replacing grab bars. IHCD can provide schematic designs for these renovations.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Toilet and Bathing Rooms.

Signage (cost estimate – up to \$1,000)

Install accessible signage at all toilet rooms.
 Where toilet rooms are inaccessible,
 signage should direct residents to the
 closest accessible toilet room in the facility.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 4 – Additional Access

Drinking Fountain (cost estimate – up to \$1,000)

 Either provide an accessible drinking fountain or provide an adjacent water cooler with cups for equivalent access at the inaccessible drinking fountain.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Drinking Fountains.

Kitchenette

(cost estimate – TBD depending on scope)

- Short Term: Ensure policies are developed to address employee accommodation requests.
- Long Term: As kitchenettes are replaced, ensure that replacements meet all ADA/MAAB requirements.

For additional information, please see Part E – ADA/MAAB References – Special Rooms, Spaces and Elements for Kitchens and Kitchenettes.

Outdoor Amenities (cost estimate – up to \$5,000)

At the main entrance:

- Provide a level clear space at the bookdrop and ensure that the bookdrop is operable with a closed fist.
- 2. Provide at least one accessible exterior bench and one checker/chess table.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements for Depositories, Vending Machines, Change Machines, Mail Boxes, and Fuel Dispensers and Dining Surfaces and Work Surfaces.

Safety and Usability Recommendations

1. Provide at least 42" clear width between library stacks, shelves, and other furniture.



East Branch

L2 - East Branch

Building Description

Located at 115 Broadway, the East Branch Library is a single-story structure built between Michigan and Illinois Avenues.

No off-street public parking is offered in this facility. Staff parking is provided on the short driveway off Michigan Avenue. No accessible parking spaces for public or staff were identified in this facility.

The building has one entrance on Broadway. This entrance is accessible via ramp, although the ramp has surface and drop-off edge protection issues.

A partially accessible toilet room for staff and public use is located near the exit door at the rear of the building.

At the entry lobby, a counter exceeds the maximum allowable height for visitors using wheeled mobility devices or who are of short stature.

Structural Accessibility

While the building was designed and built prior to state and federal accessibility regulations and has undergone some accessibility upgrades, the City has ongoing obligations for accessibility:

The City must ensure that students and the public can access the programs, services and activities at the East Branch as well as the entire Library system.

Aside from modifying policies and procedures to ensure programmatic access, this also means:

- Elements that were previously modified or not constructed in compliance with code must be corrected to current standards;
- As alterations and renovations are undertaken, elements that are not accessible must be brought into compliance with current 521CMR and 2010 ADA Standards;
- Building elements that are inaccessible as a result of new standards adopted since they were built, need to be brought into compliance if they are a barrier to equal participation in programs, services and activities offered.



Photo 1



Photo 2



Photo 3

Issues

Priority 1 - Approach & Entrance

Parking & Drop-off Area

No off-street public parking is offered in this facility. Staff parking is provided on the short driveway off Michigan Avenue. (Photo 1)

No accessible parking spaces for staff as well nor an accessible drop-off area were identified in this facility.

Sidewalks and Curb Ramps

The entrance to the library is directly connected to the sidewalks along Broadway and Michigan and Illinois Avenues. Although the sidewalks are mostly in reasonable condition, deteriorated curb ramps lacking level landings can become tripping hazards to the public and staff. (Photo 2)

Entrance

The building has one entrance in front of the building on Broadway. This entrance is accessible via a ramp, although the ramp does not meet the minimum allowable width, is missing the required drop-off edge protection on both sides, and slightly exceeds the maximum allowable running slope. (Photo 3)

In addition to the ramp, a short stairway connects the sidewalk to the library entrance. This stairway offers a non-compliant railing along the fence.

A wall-mounted light fixture located at the top of the ramp creates a hazardous protruding object. This protruding object increases the likelihood of injuries among people with low or no vision or others who may be unobservant.



Photo 4

Priority 2 - Access to Goods & Services

Doors

At the entrance, exterior and interior doors exceed the maximum allowable force required to open them. Additionally, the interior doubleleaf doors of the vestibule do not have the minimum clear width for accessible doors.

Doors leading to the office and the rear exit have non-compliant hardware and do not have the minimum maneuvering clearance required to open them. (Photos 4, 5 and 6)



Photo 5



Photo 6



Photo 7



Photo 8



Photo 9

Sale & Service Counters

At the entry lobby, the circulation counter exceeds the maximum allowable height for visitors using wheeled mobility devices or who are of short stature. (Photo 7)

Work Surfaces

Specific workstations such as those with computers do not provide the require knee and toe clearance. (Photo 8)

Signage

Very little signage is provided at this facility and not all permanent rooms and spaces are properly identified with ADA-compliant signs. (Photo 9)



Photo 10



Photo 11



Photo 12

Priority 3 – Toilet Rooms

Toilet Rooms

A single-user toilet room for staff and public use is located near the exit door at the rear of the building. Although this toilet room is generally usable by persons with disabilities, it does not meet all of the requirements of applicable accessibility standards. (Photos 10 & 11)

Signage

Toilet rooms are not identified with accessible signage. (Photo 9)

Priority 4 - Additional Access

No additional access, such as drinking fountains and public phones were found in this facility.

Recommendations

Priority 1 – Approach & Entrance

Parking & Drop-off Area (cost estimate – TBD depending on scope)

 Title II entities are not required to provide off-street public parking; however, if the entity decides to provide public parking then accessible parking must be provided.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and General Site and Building Elements for Accessible Parking.

Sidewalks and Curb Ramps (cost estimate – up to \$10,000)

1. Replace the curb ramps at the nearby intersections.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Curb Ramps.

Entrances (cost estimate – up to \$10,000)

- 1. Raise or relocate the wall-mounted light fixture located at the top of the ramp.
- 2. Provide compliant handrails on both sides of the stairway along the fence.
- 3. Make the following modifications to ramp:
 - a. Short Term: Provide edge protection along ramp.
 - b. Long Term: eventually reconstruct ramp.

For additional information, please see Part E – ADA/MAAB References – Building Blocks for Protruding Objects, Accessible Routes for Ramps, and General Site and Building Elements for Stairways.

Priority 2 – Access to Goods & Services

Doors (cost estimate – up to \$5,000)

- Create a comprehensive maintenance program and schedule to check and adjust the opening force of all exterior and interior doors. Where not possible, either keep heavy doors open during regular hours or add automatic openers.
- In the vestibule, either keep the interior double-leaf doors open during regular hours or replace them with a wider single-leaf door.
- 3. Replace door knobs with lever hardware.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Doors, Doorways, and Gates.

Sales and Service Counters (cost estimate – up to \$5,000)

- Short term: Provide an auxiliary counter with a maximum height of 36 inches in close proximity to the main counter, or provide equivalent facilitation. Equivalent facilitation may be provided in the form of a folding shelf attached to the main counter, an auxiliary table nearby, a clipboard made available to the public, or other means.
- 2. Long Term: Provide an accessible circulation counter.

For additional information, please see Part E – ADA/MAAB References – ADA Reference – Built-in Elements for Sales and Service Counters.

Work Surfaces (cost estimate – up to \$5,000)

1. Ensure that at least one of each work surface is accessible.

For additional information, please see Part E – ADA/MAAB References – Built-In Elements for Work Surfaces.

Signage (cost estimate – up to \$5,000)

 Implement a comprehensive signage plan to ensure that ADA-compliant signs are installed alongside all doors to identify permanent rooms and spaces.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 3 – Toilet Rooms

Toilet Rooms (cost estimate – up to \$5,000)

- Short Term: In the toilet room, relocate or recess the wall-mounted paper towel dispenser and install an 18-inch long grab bar behind the toilet. IHCD can provide schematic designs for these renovations.
- 2. Long Term: Modify toilet room to comply with current accessibility regulations.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Toilet and Bathing Rooms.

Signage (cost estimate – up to \$1,000)

1. Install accessible signage at the toilet room.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Safety and Usability Recommendations

1. Provide at least 42" clear width between library stacks, shelves, and other furniture.



West Branch

L3 - West Branch

Building Description

Located at 40 College Avenue, the West Branch library is a three-story, Classical Revival-style structure built near Davis Square. The building is completely inaccessible, lacking an accessible entrance or elevator, among other features.

No off-street public parking is offered in this facility. Staff parking is provided on the driveway behind the building. No accessible parking spaces for public or staff were identified in this facility.

The building has entrances on two sides – in the front on College Avenue and at the rear along the parking lot. Neither entrance is accessible since stairways are provided to both the first floor and basement level.

At both entrances (front and rear), egress stairways offer vertical circulation to all floor levels. No elevator is provided in this facility.

One toilet room for staff and public use is located on the basement level only. This toilet room is not accessible and is not located on an accessible route.

Services to public are offered on all floor levels, including the basement.

Structural Accessibility

While the building was designed and built prior to state and federal accessibility regulations and has undergone some accessibility upgrades, the City has ongoing obligations for accessibility:

The City must ensure that students and the public can access the programs, services and activities at the West Branch as well as the entire Library system.

Aside from modifying policies and procedures to ensure programmatic access, this also means:

- Elements that were previously modified or not constructed in compliance with code must be corrected to current standards;
- As alterations and renovations are undertaken, elements that are not accessible must be brought into compliance with current 521CMR and 2010 ADA Standards;
- Building elements that are inaccessible as a result of new standards adopted since they were built, need to be brought into compliance if they are a barrier to equal participation in programs, services and activities offered.



Photo 1



Photo 2



Photo 3

Issues

Priority 1 - Approach & Entrance

Parking & Drop-off Area

No off-street public parking is offered in this facility. No off-street public parking is offered in this facility. Staff parking is provided on the driveway behind the building. No accessible parking spaces for public or staff as well as a drop-off area were identified in this facility.

Sidewalks and Curb Ramps

The entrance to the library is directly connected to the sidewalk along College Avenue. Although the sidewalks are in reasonable condition, deteriorated and excessively sloped curb ramps can become tripping hazards to the public and staff. (Photo 1)

Entrance

The building has entrances on two sides – in the front on College Avenue and at the rear along the parking lot. Neither entrance is accessible since stairways are provided to both the first floor and basement level. As such, strollers and walkers are routinely parked outdoors exposed to the weather. (Photos 2 and 3)



Photo 4



Photo 5



Photo 6

Priority 2 – Access to Goods & Services

Doors

Throughout the building, several doors exceed the maximum allowable force required to open them and do not have the minimum clear width for accessible doors. Additionally, numerous doors have non-compliant hardware and do not have the minimum maneuvering clearance required to open them. (Photo 4)

Floor Surfaces

At the front entrance as well as other circulation areas within the first floor, several weather mats are not secure and can become tripping hazards to visitors and staff. (Photo 5)

Stairways

At both entrances (front and rear), egress stairways offer vertical circulation to all floor levels. Neither stairway has compliant handrails. (Photo 6)

Signage

Very little signage is provided at this facility and not all permanent rooms and spaces are properly identified with ADA-compliant signs.



Photo 7



Photo 8



Photo 9

Priority 3 - Toilet Rooms

Toilet Rooms

One single-user toilet room for staff and public use is provided on the basement level. At some point, this toilet room was altered to offer a few accessible features including grab bars and lever-type faucets. However, this toilet room is not accessible since it is not located on an accessible route. (Photos 7 and 8)

The following additional issues were identified:

- The lavatory reduces the clear width and maneuvering space of the entry door;
- The narrow width of the room compromises approach, clear space, and turning radius to interact with the toilet, baby changing table, and lavatory;
- The clear space of the baby changing table is mostly blocked by the toilet;
- Grab bars and paper towel dispenser are improperly located;
- Lavatory lacks sufficient clearance and pipes are not wrapped.

Signage

The toilet room does not a sign to properly identify it. (Photo 9)

Priority 4 – Additional Access

No additional access, such as drinking fountains and public phones were found in this facility.

Recommendations

Priority 1 – Approach & Entrance

Parking & Drop-off Area (cost estimate – TBD depending on scope)

 Title II entities are not required to provide off-street public parking; however, if the entity decides to provide public parking then accessible parking must be provided.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and General Site and Building Elements for Accessible Parking.

Sidewalks and Curb Ramps (cost estimate – up to \$10,000)

1. Replace the curb ramps leading to the front entrance.

For additional information, please see Part C – ADA/MAAB References – Accessible Routes for Curb Ramps.

Entrances

(cost estimate – TBD depending on scope)

- Residents who are unable to navigate stairways cannot access the programs, services, and activities at the West Branch Library. Develop policies and procedures to accommodate persons unable to navigate stairways upon request.
- 2. Provide information online and at the main entrance advising how to obtain access to programs, services, and activities at the West Branch Library.

For additional information, please see Program Accessibility.

Priority 2 – Access to Goods & Services

Doors (cost estimate – up to \$5,000)

- When doors do not have the minimum clear width for accessible doors, either keep them open during regular hours or replace them with wider doors.
- 2. Replace door knobs with lever hardware.
- Create a comprehensive maintenance program and schedule to check and adjust the opening force of all exterior and interior doors. Where not possible, either keep heavy doors open during regular hours or add automatic openers.
- Provide an automatic opener wherever doors do not have the required maneuvering clearance on their latch side. Prioritize entry doors and doors to toilet rooms.

For additional information, please see Part C – ADA/MAAB References – Accessible Routes for Doors, Doorways, and Gates.

Floor Surfaces (cost estimate – up to \$1,000)

 Secure all weather mats with industrialstrength double-stick tape. Alternatively, replace them with recessed walk-off mats or grates.

For additional information, please see Part C – ADA/MAAB References – Accessible Routes for Floor Surfaces.

Stairways (cost estimate – up to \$10,000)

- 1. Install compliant handrails on both sides of all internal and egress stairways.
- Develop policies and procedures to evacuate individuals unable to navigate stairs.

For additional information, please see Part C – ADA/MAAB References – Scoping for Emergency Egress and General Site and Building Elements for Stairways.

Signage (cost estimate – up to \$5,000)

 Implement a comprehensive signage plan to ensure that ADA-compliant signs are installed alongside all doors to identify permanent rooms and spaces.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 3 – Toilet Rooms

Toilet Rooms

(cost estimate – up to \$5,000)

- Make the following improvements in the single-user toilet room on the basement level:
 - a. Protect the plumbing underneath the lavatory.
 - b. Relocate the baby changing table so that a clear floor space is not obstructed by plumbing fixtures.
 - c. Relocate the grab bars and toilet paper dispenser.

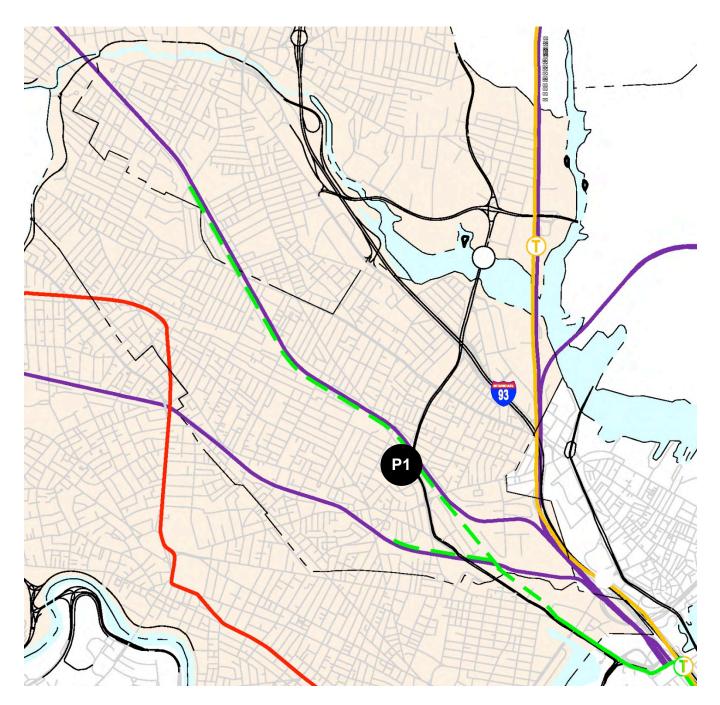
For additional information, please see Part C – ADA/MAAB References – Plumbing Elements and Facilities for Toilet and Bathing Rooms.

Signage (cost estimate – up to \$1,000)

1. Install accessible signage at the toilet room.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

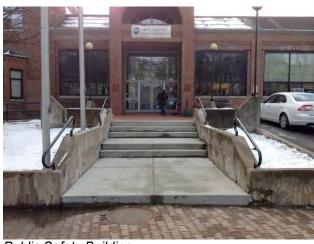




Police Station

P1 – Public Safety Building





Public Safety Building

P1 - Public Safety Building

Building Description

The City of Somerville owns and operates one police station located in Union Square. The Public Safety Building, as it is known, can be entered though both Somerville Avenue and Washington Street. This facility houses the police station on all three floors, although part of the first floor is also used by Fire Engine 3.

Structural Accessibility

While it was designed and built prior to state and federal accessibility regulations and has undergone some accessibility upgrades, the City has ongoing obligations for accessibility:

The City must ensure that the public can access the programs, services and activities at the Public Safety Building.

Aside from modifying policies and procedures to ensure programmatic access, this also means:

- Elements that were not constructed in compliance with code must be corrected to current standards.
- As alterations and renovations are undertaken, elements that are not accessible must be brought into compliance with current 521CMR and 2010 ADA Standards.
- Building elements that are inaccessible as a result of new standards adopted since they were built, need to be brought into compliance if they are a barrier to equal participation in programs, services and activities offered.



Photo 1



Photo 2



Photo 3

Issues

Priority 1 - Approach & Entrance

Parking & Drop-off Area

Off-street parking for staff and public is provided at this facility. Although two accessible parking spaces for public are provided in the parking lot off Washington Street, the required access aisle and signs are missing. (Photo 1)

No drop-off area was identified in this facility.

Sidewalks and Curb Ramps

Exterior sidewalk access to the Public Safety Building is problematic because of noncompliant curb ramps and sidewalks with deteriorated surface that can become tripping hazards to the public and staff, especially along Merriam Street. (Photos 2 and 3)



Photo 4



Photo 5



Photo 6

Entrances

The Public Safety Building has entrances on two floor levels several feet above or below the exterior grade – one at Washington Street, the other on Somerville Avenue.

On Washington Street, the entrance is accessible via a stairway and a ramp. Although the ramp is generally usable by persons with disabilities, it does not meet all of the requirements of applicable accessibility standards, such as deteriorated surface, missing drop-off edge protection on both sides, and non-compliant handrail at the top of the ramp. (Photo 4)

The stairway that leads to this entrance offers non-compliant handrails on both sides. (Photo 5)

On Somerville Avenue, the entrance is accessible via a series of stairways and a ramp. Although the ramp is generally usable by persons with disabilities, it does not meet all of the requirements of applicable accessibility standards. Not only are the handrails on both sides non-compliant, dumpsters are also placed against them. (Photo 4)

The stairways that lead to this entrance offer non-compliant handrails on both sides.



Photo 7



Photo 8



Photo 9

Priority 2 - Access to Goods & Services

Doors

At the entry vestibule of the Washington Street entrance as well as the toilet rooms on the first floor, interior doors exceed the maximum allowable force required to open them. (Photo 7)

Additionally, numerous doors on all floor levels have non-compliant hardware and do not have the minimum maneuvering clearance required to open them. (Photo 8)

Protruding Objects

On the second floor, a structural metal support near the stairway increases the likelihood of injuries among people with low or no vision or others who may be unobservant. (Photo 9)



Photo 10



Photo 11



Photo 12

Sale & Service Counters

At the entry lobby on the first floor, both the information and front desk counters exceed the maximum allowable height for visitors using wheeled mobility devices or who are of short stature. (Photo 10)

Holding Cells

At the basement level, no accessible holding cells are provided. (Photo 11)

Signage

Very little signage is provided at this facility and not all permanent rooms and spaces are properly identified with ADA-compliant signs. (Photo 12)



Photo 13



Photo 14



Photo 15

Priority 3 – Toilet Rooms

Toilet Rooms

A set of multi-user toilet rooms (one for each gender) for public use are located on the first floor. Both toilet rooms are partially accessible because the plumbing underneath the lavatories is not protected and the grab bars inside the toilet stalls do not meet the minimum allowable height. (Photos 13 and 14)

Signage

Toilet rooms are not identified with accessible signage. (Photo 15)



Photo 16



Photo 17



Photo 18

Priority 4 - Additional Access

Drinking Fountain

In the lobby on the first floor, the drinking fountain does not provide the required knee clearance. An accessible alternative water cooler is not provided. (Photo 16)

Kitchenette

On the basement level, the kitchenette was renovated recently; however, it lacks clear floor space and an accessible sink, among other items. (Photo 17)

Locker Rooms

On the basement level, a set of multi-user locker rooms (one for each gender) for staff use were renovated recently; however, they are completely inaccessible. (Photo 18)

Recommendations

Priority 1 – Approach & Entrance

Parking & Drop-off Area (cost estimate – up to \$1,000)

 Provide a 96-inch wide access aisle between the two accessible parking spaces and install one sign at each space.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and General Site and Building Elements for Accessible Parking.

Sidewalks and Curb Ramps (cost estimate – up to \$25,000)

 Repair or replace all degraded curb ramps and walking surfaces leading to the Public Safety Building.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Accessible Routes and Curb Ramps.

Entrances (cost estimate – up to \$25,000)

- On both ramps leading to the entrances, replace or modify handrails and repair deteriorated surface.
- Install compliant handrails on both sides of the stairways leading to both entrances of Public Safety Building.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Ramps and General Site and Building Elements for Stairways.

Priority 2 – Access to Goods & Services

Doors (cost estimate – up to \$5,000)

- 1. Replace door knobs with lever hardware.
- Create a comprehensive maintenance program and schedule to check and adjust the opening force of all exterior and interior doors. Where not possible, either keep heavy doors open during regular hours or add automatic openers.
- Provide an automatic opener wherever doors do not have the required maneuvering clearance on their latch side. Prioritize entry doors and doors to toilet rooms.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Doors, Doorways, and Gates.

Protruding Objects (cost estimate – up to \$1,000)

 Install a cane-detectable barrier to protect the underside of the structural metal support near the stairway. Cane-detectable barriers could be trash cans, fixed panels, furniture, or other permanent barriers.

For additional information, please see Part E – ADA/MAAB References – Building Blocks for Protruding Objects.

Sales and Service Counters (cost estimate – up to \$5,000)

- Short term: Provide an auxiliary counter with a maximum height of 36 inches in close proximity to the main counter, or provide equivalent facilitation. Equivalent facilitation may be provided in the form of a folding shelf attached to the main counter, an auxiliary table nearby, a clipboard made available to the public, or other means.
- 2. Long Term: Prioritize the installation of accessible counters at high traffic areas.

For additional information, please see Part E – ADA/MAAB References – ADA Reference – Built-in Elements for Sales and Service Counters.

Holding Cells

(cost estimate – TBD depending on scope)

 Holding cells will need to be made accessible when renovated.

For additional information, please see Part E – ADA/MAAB References – ADA Reference – Special Rooms, Spaces and Elements for Holding Cells and Housing Cells.

Signage (cost estimate – up to \$10,000)

 Implement a comprehensive signage plan to ensure that ADA-compliant signs are installed alongside all doors to identify permanent rooms and spaces.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 3 - Toilet Rooms

Toilet Rooms

(cost estimate – up to \$5,000)

 In both multi-user toilet rooms, protect plumbing underneath lavatories and raise the grab bars inside the toilet stalls so that they are mounted between 33 inches and 36 inches above the floor.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Toilet and Bathing Rooms.

Signage (cost estimate – up to \$1,000)

Install accessible signage at all toilet rooms.
 Where toilet rooms are inaccessible,
 signage should direct residents to the
 closest accessible toilet room in the facility.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 4 - Additional Access

Drinking Fountain (cost estimate – up to \$1,000)

 Either provide an accessible drinking fountain or provide an adjacent water cooler with cups for equivalent access at the inaccessible drinking fountain.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Drinking Fountains.

Kitchenette

(cost estimate – TBD depending on scope)

- Short Term: Ensure policies are developed to address employee accommodation requests.
- Long Term: As kitchenettes are replaced, ensure that replacements meet all ADA/MAAB requirements.

For additional information, please see Part E – ADA/MAAB References – Special Rooms, Spaces and Elements for Kitchens and Kitchenettes.

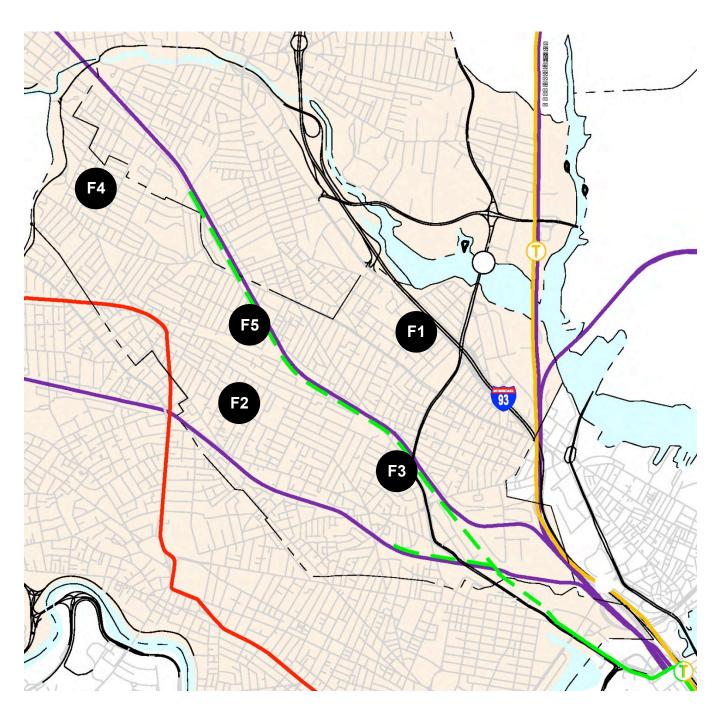
Locker Rooms

(cost estimate – up to \$25,000)

 Modify both multi-user locker rooms on the basement level to meet all ADA/MAAB requirements.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Toilet and Bathing Rooms.





Fire Stations

F1 – SFD Central Headquarters

F2 – SFD Engine 1 (former Engine 4)

F3 – SFD Engine 3

F4 – SFD Engine 6

F5 – SFD Engine 7





Fire Engine 1 (former Engine 4)

Fire Stations

Description

The City of Somerville owns and operates five fire stations:

- F1 SFD Central Headquarters, Winter Hill
- F2 SFD Engine 1 (former Engine 4),
 Wilson Square
- F3 SFD Engine 3, Union Square
- F4 SFD Engine 6, Teele Square
- F5 SFD Engine 7, Spring Hill

Structural Accessibility

While it was designed and built prior to state and federal accessibility regulations and has undergone some accessibility upgrades, the City has ongoing obligations for accessibility:

The City must ensure that the public can access the programs, services and activities at the Fire Stations.

Aside from modifying policies and procedures to ensure programmatic access, this also means:

- Elements that were not constructed in compliance with code must be corrected to current standards.
- As alterations and renovations are undertaken, elements that are not accessible must be brought into compliance with current 521CMR and 2010 ADA Standards.
- Building elements that are inaccessible as a result of new standards adopted since they were built, need to be brought into compliance if they are a barrier to equal participation in programs, services and activities offered.



Photo 1



Photo 2



Photo 3

Central Headquarters

Located at the intersection of Broadway and Walnut Street, Central Headquarters is a two-story brick structure with staff spaces above the five-door apparatus bay. (Photo 1)

This fire station is also used as a polling place during elections, where a non-compliant temporary ramp covers the step down into the apparatus bay. An at-grade entrance is provided at the far right adjacent to the dispatch room and toilet rooms. (Photo 2)

The emergency call box located near the main entrance is not on an accessible route since it is located beyond the concrete walkway. (Photo 3)

No off-street parking for the public is offered at this fire station. None of the employee areas, including, but not limited to the dispatch office, crew sleeping quarters, kitchen, lockers, showers, and toilet rooms, are accessible. No elevator is provided to the second floor despite public services being provided on that floor. These services include various permits and safety programs.



Photo 1



Photo 2



Photo 3

Engine 1 (former Engine 4)

Located at the intersection of Somerville Avenue and Lowell Street, the Wilson Square Fire Station is a one-story brick structure with staff spaces on both sides of the two-door apparatus bay. (Photo 1)

Formerly known as Engine 4, this fire station is also used as a polling place during elections.

No off-street parking for the public is offered at this fire station. The entrance is accessed via a short stairway without handrails. (Photo 2)

Once inside, a table obstructs the path to the dispatch office. (Photo 3)

None of the employee areas, including, but not limited to, dispatch office, crew sleeping quarters, kitchen, lockers, showers, and toilet rooms, are accessible.



Photo 1



Photo 2



Photo 3

Engine 3

Located at the Public Safety Building on Somerville Avenue, the Union Square Fire Station is the only fire station without any public interface. This fire station is not used a polling place and programs, services, and activities that once were offered at this facility have been relocated to other facilities.

Off-street parking is provided in the parking lot off Somerville Avenue. A non-compliant accessible parking space without the required access aisle and signage is provided.

A trailer that serves as the crew sleeping quarter is attached to the apparatus bay on the basement of the Public Safety Building. The apparatus bay can only be accessed through a very steep driveway or stairways. None of the employee areas in this facility are accessible. On the side of the trailer, an emergency call box is not on an accessible route since it is placed at about five feet above the steep driveway. (Photo 2)

While most fire stations have not had any accessibility updates in many decades, there has been an attempt to increase the accessibility at Engine 3 with the installation of a ramp near the entrance on Somerville Avenue. Although the ramp may have been codecompliant at the time of its installation, it does not meet the minimum requirements of the current accessibility laws and regulations. In fact, the ramp has become a hazard due it the lack of maintenance. (Photo 3)



Photo 1



Photo 2



Photo 3

Engine 6

Located at the intersection of Broadway and Holland Street, the Teele Square Fire Station is a two-story brick structure with staff spaces above the two-door apparatus bay. (Photo 1)

An at-grade entrance is provided at the far right near the intersection; however, this door opens into the egress stairway and a step obstructs the accessible route to the apparatus bay. An emergency call box located near the main entrance is not on an accessible route since it is located above a sign and beyond the concrete walkway. (Photo 2)

No off-street parking for the public is offered at this fire station. None of the employee areas, including, but not limited to the dispatch office, crew sleeping quarters, kitchen, lockers, showers, and toilet rooms, are accessible. No elevator is provided to the staff-only second floor.

This fire station is also used as a polling place during elections, where the driveway serves as ramp into the apparatus bay. (Photo 3)



Photo 1



Photo 2



Photo 3

Engine 7

Located on Highland Avenue, the Spring Hill Fire Station is a two-story brick structure with staff spaces above the two door apparatus bay. (Photo 1)

An at-grade entrance is provided at the right of the apparatus bay, adjacent to the dispatch room and toilet room. However, this door opens into a small vestibule that impedes the access into the apparatus bay.

No off-street parking for the public is offered at this fire station. None of the employee areas, including, but not limited to the dispatch office, crew sleeping quarters, kitchen, lockers, showers, and toilet rooms, are accessible. No elevator is provided to the staff-only second floor.

The emergency call box is not on an accessible route since it is located directly above a traffic light control box. (Photo 2)

This fire station is also used as a polling place during elections, where the driveway serves as ramp into the apparatus bay. (Photo 3)

Recommendations

Priority 1 – Approach & Entrance

Parking & Drop-off Area (cost estimate – up to \$1,000)

- Title II entities, such as fire stations, are not required to provide off-street public parking; however, when fire stations decide to provide public parking then accessible parking must be provided.
- 2. At Engine 3, improve the accessible parking.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and General Site and Building Elements for Accessible Parking.

Emergency Call Boxes (cost estimate – up to \$5,000)

 Inaccessible emergency call boxes inhibit residents using wheeled mobility devices to summon the fire department in case of emergency. Relocate inaccessible emergency call boxes so that they are mounted on an accessible route and at an accessible height (no higher than 48" above the ground).

For additional information about addressing these issues, please see Part E – ADA Reference – Building Blocks for Operable Parts.

Ramp (cost estimate – up to \$5,000)

1. At Engine 3, maintain or remove wooden ramp.

For additional information about addressing these issues, please see Part E – ADA Reference – Accessible Routes for Ramps.

Stairway (cost estimate – up to \$1,000)

1. At Engine 1, install handrails on the short stairway that lead to the entrance.

For additional information about addressing these issues, please see Part E – ADA Reference – General Site and Building Elements for Stairways.

Priority 2 - Access to Goods & Services

Programs, Services, and Activities (cost estimate – TBD depending on scope)

- Ensure all programs, services and activities offered on the second floor of this facility can be provided, upon request, at an accessible facility.
- 2. Ensure that policies and procedures are in place for fire stations used as polling places by residents with disabilities.

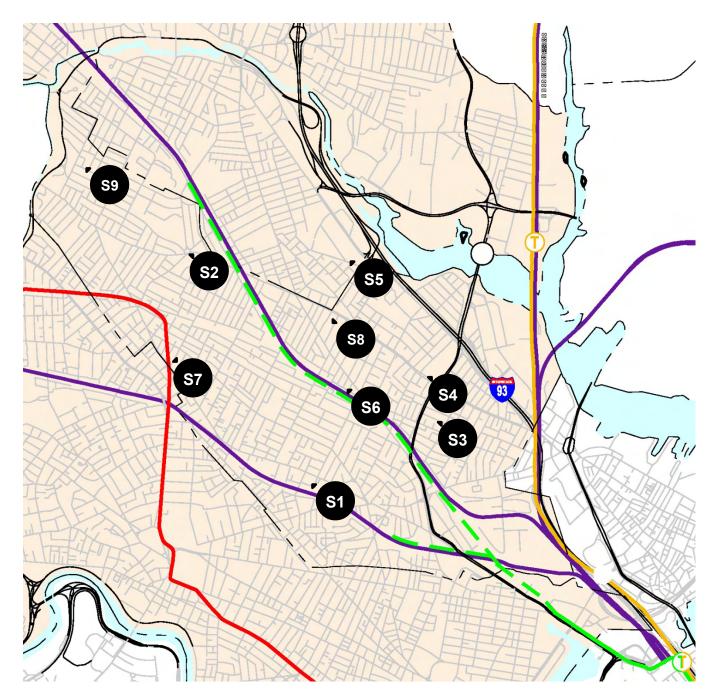
For additional information about addressing these issues, please see Program Accessibility.

Priority 3 – Toilet Rooms (cost estimate – TBD depending on scope)

 Title II entities are not required to provide toilet rooms for public use; however, when fire stations decide to provide toilet rooms for the public then accessible amenities must be provided.

For additional information about addressing these issues, please see Part E – ADA Reference – Plumbing Elements and Facilities: Toilet and Bathing Rooms.





Schools

- S1 Argenziano
- S2 Brown
- S3 Capuano
- S4 -Next Wave & Full Circle
- S5 Healey
- S6 High School
- S7 Kennedy
- S8 Winter Hill
- S9 West Somerville Neighborhood





Argenziano School

S1 – Argenziano School

Building Description

Located at 290 Washington Street is a threestory building constructed primarily with brick and concrete masonry units in 2006 and opened in 2007. The building is designed for kindergarten through Grade 8 and provides activities until 5:30 p.m. The school abuts athletic fields and a playground that were constructed in conjunction with the school.

Located on a flat site, the building's main entrance and staff only entrances are at grade, essentially the same as adjacent sidewalks. Intercoms and security systems are present. Though the school is a designated emergency shelter for Somerville, MEMA, and FEMA use, the school lacks accessible showers for shelter use beyond 48 hours and may require backup power for refrigeration and elevator usage.

No accessible drop-off is provided but a limited number of public off-street public parking spaces are provided at this facility.

As one would expect for a new school, an elevator and multiple egress stairways offer vertical circulation to both floor levels. Likewise, giving the diverse ages served, single user toilet rooms are found in many classrooms. Toilet rooms for staff are provided on all floors. Toilet rooms for public use are located at the main office and at the cafetorium.

Services to students and or the public are offered on all floor levels. Aside from the typical issues of doors that exceed the maximum allowable opening force, unsecured carpets, and some relatively minor issues in toilet rooms, overall accessibility is quite good.

Structural Accessibility

While most of the building elements were designed and built in accordance to state and federal accessibility regulations, the City has ongoing obligations for accessibility:

The City must ensure that students and the public can access the programs, services and activities at the Argenziano School.

Aside from modifying policies and procedures to ensure programmatic access, this also means:

- Elements that were not constructed in compliance with code must be corrected to current standards.
- As alterations and renovations are undertaken, elements that are not accessible must be brought into compliance with current 521CMR and 2010 ADA Standards.
- Building elements that are inaccessible as a result of new standards adopted since they were built, need to be brought into compliance if they are a barrier to equal participation in programs, services and activities offered.

Building Summary and Recommendations

Similar to other new buildings within Somerville, the Argenziano School has few typical accessibility concerns that impact student access beyond issues with furniture arrangement and lack of evacuation chairs. For staff and faculty, there may be issues with excessively weighted doors or furniture arrangement in staff only spaces.

1. Accessible parking spaces lack compliant grading, striping and signage;

- 2. There is not an accessible route to each type of athletic field;
- Recessed door hardware on multi-user toilet rooms are non-compliant and inoperable with a closed fist;
- Routes between classrooms are compromised by storage, furniture, unsecured carpets and protruding objects;
- Where provided, accessible designating signage lacks Braille and or raised characters:
- The school lacks accessible showers for emergency shelter use beyond 48 hours and may require backup power for refrigeration and elevator usage.

Alongside the development of policies and procedures to address a number of the above conditions, given these overall findings, the following projects should be undertaken:

- 1. Install accessible door hardware on multiuser toilet rooms;
- Provide and identify accessible route to each type of athletic field;
- 3. Make minor modifications to existing multiuser toilet rooms
- 4. Re-grade, resurface and re-stripe accessible parking;

Safety and Usability Recommendations

- 1. Acquire evacuation chairs and locate in at front and rear second floor stairwells.
- Consider installing one or more accessible showers to meet emergency shelter needs;
- Consider providing backup power for elevator and refrigeration to meet emergency shelter needs.



Photo 1



Photo 2



Photo 3

Issues

Priority 1 – Approach & Entrance

Parking & Drop-off Area

There are limited off-street staff and public parking spaces adjacent to the building. The following issues were identified:

- access aisles are not striped or worn down;
- running and cross slopes exceed 1:48 in any direction;
- pavement surfaces have indications of pooling water;
- signage is mounted below 60 inches above the ground.

Sidewalks and Curb Ramps

Sidewalks abutting the Argenziano School along Washington and Franklin Streets were rebuilt when the school opened. No major issues were identified apart from portions of sidewalk abutting the soccer field that had cross slopes in excess of 1:50 and catch basins that had openings greater than 1/2 inch and were tripping hazards. (Photo 2)

Entrances

The building has one public entrance on Washington Street as well as locked employee only entrances. Each entrance is at grade and have double doors. The main entrance is visible from the office; however, the intercom lacks accessible signage. (Photo 3)



Photo 3



Photo 4



Photo 5

Priority 2 - Access to Goods & Services

Specific Academic and Extra-Curricular Spaces

Schools by nature have many specific and highly customized spaces such as art rooms, biology labs, chemistry labs, lab preparation rooms, world language labs, auto and wood shops, athletic facilities, etc. There is an obligation for students to be able to participate in all academic and extra-curricular activities. Likewise, faculty and staff may request individual accommodations. The following issues were identified:

- cafeteria, computer and media lab work surfaces provided less than 27 inches of knee clearance, no accessible stations were found; (Photos 3 and 4)
- specialized work stations such as in the art room may require extended forward reach ranges and or lack knee/toe clearance. (Photo 5)

Additionally, the Argenziano School serves a Kindergarten to Grade 8 population and appears to have certain single user toilet rooms designed for children of different ages. Those designed for grades K-3 or 4-6 should be serving the respective grades.

Elevators

One elevator is provided in this school. However, the elevator inspection certificate is expired.



Photo 6



Photo 7



Photo 8

Doors

The recessed door pulls used on multi-user toilet rooms are non-compliant and inoperable with a closed fist. (Photo 6)

Throughout the building, the following additional door issues were identified:

- Some toilet rooms lack 18-inch clearance on latch pull side; (Photo 7)
- A few doors have reduced maneuvering clearance on the latch pull side or cannot open a full 90 degrees because of furniture or stored items;
- Some single- and double-leaf doors exceed the maximum allowable force required to open them.

Floor Surfaces

The Argenziano School has the following conditions floor surface issues:

- Unsecured weather mats; (Photo 8)
- Unsecured carpets in classrooms.

Protruding Objects

Throughout the circulation path in the building, hazardous protruding objects can increase the possibility of injury to visitors and staff. Few major objects were identified however staff should be aware that protruding objects generally include, but are not limited to, the following:

- hanging TVs and network/data boxes;
- · display cases;
- automatic external defibrillator
- fire extinguishers;
- underside of egress stairways.



Photo 9



Photo 10



Photo 11

Stairways

The five steps from the stage appear to conform to Massachusetts Building Code's requirements. However, the stairs are located at a ramp landing where the ramp turns 90 degrees creating a possible safety risk. (Photo 9)

Multiple egress stairways offer vertical circulation to all floor levels. However no stairwell is designated as an Area of Refuge nor equipped with an evacuation chair.

Interior Routes

In schools, it is not uncommon to find inaccessible or compromised interior routes. In the survey of the Argenziano School, the following conditions were identified:

 Access between classrooms is sometimes obstructed by furniture. (Photo 10)

Signage

Virtually all permanent rooms and spaces have designating signage however there are some issues:

- Braille was typically missing from signage; (Photo 11)
- Classroom designation signage is covered by artwork;
- Accessible entrances have worn or are missing ISA symbol.



Photo 12



Photo 13

Priority 3 – Toilet Rooms

Toilet Rooms

Toilet rooms for students are found in many classrooms and some are designed for their target age population. Toilet rooms for staff are provided on all floors in all buildings. Toilet rooms for public use are located at the main office and at the cafetorium. Looked at in entirety, the toilet rooms in this facility are in very good shape but a number of specific issues were identified. Student use toilet rooms have the following issues:

- Height of toilet and grab bars may not match target age group designed for;
- Trash receptacles made intrude on clear floor space.

Multi-user toilet rooms generally are accessible apart from the following issues identified:

- The curved multi-user sinks' knee and toe space does not meet the technical requirements for the full 30-inch width of the clear floor space required at the sink. IHCD would be available to review the product specification "cut" sheet prior to further installations (photo 12);
- The recessed door pulls are non-compliant and inoperable with a closed fist;
- Until accessible door hardware is installed, provide accessible signage identifying the toilet rooms as inaccessible and directions to accessible toilet rooms.

Staff toilet rooms generally are single-user and accessible. The following issues were identified:

- Dispensers and coat hooks are missing or are mounted incorrectly; (Photo 13)
- Trash receptacles made intrude on clear floor space.



Photo 14



Photo 15

Locker and Shower Rooms

Though not required during construction, a shower room is not provided despite the school being designated as an emergency shelter.

Priority 4 - Additional Access

Classroom Lavatories

Most classrooms have counter inset sinks but soap and paper towel dispensers are located beyond reach ranges. (Photo 14)

Drinking Fountains

A hi-lo drinking fountain was inset approximately 6 inches into the wall face. That inset eliminates much of the knee and toe clearance, making the drinking fountain inaccessible.
(Photo 15)

Recommendations

Priority 1 - Approach & Entrance

Parking & Drop-off Area (cost estimate – TBD depending on scope)

- Establish a plan to provide at least two accessible parking spaces including one van designated space. This plan should assume the need to re-grade, resurface, and re-stripe existing accessible spaces.
- 2. Ensure that each accessible parking space and van designated space is identified sign mounted at 96 inches above the ground.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and General Site and Building Elements for Accessible Parking.

Entrances (cost estimate – up to \$1,000)

1. Provide accessible signage at intercom.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 2 – Access to Goods & Services

Specific Academic and Extra-Curricular Spaces

Short Term: (cost estimate – up to \$1,000)

 Develop policies and procedures to ensure students can access and participate in all programs, services and activities held in or utilizing specific academic and extracurricular spaces.

Long Term: (cost estimate – up to \$5,000)

1. Provide a fixed accessible version of each type of workstation and cafeteria table.

For additional information, please see Part E – ADA/MAAB References.

Doors & Gates (cost estimate – up to \$1,000)

- 1. Install accessible door hardware on multiuser toilet rooms.
- Create a comprehensive maintenance program and schedule to check and adjust the opening force of all exterior and interior doors. Where not possible, keep doors open during regular hours.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Doors, Doorways, and Gates.

Floor Surfaces (cost estimate – up to \$1,000)

- Secure all weather mats with industrialstrength double-stick tape. Alternatively, replace them with recessed walk-off mats or grates.
- 2. Secure all carpets.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Floor Surfaces.

Protruding Objects (cost estimate – up to \$1,000)

Install cane-detectable barriers below wall-mounted light fixtures, hand sanitizers, and old-fashioned drinking fountains. Cane-detectable barriers could be trash cans, fixed panels, furniture, or other permanent barriers.

For additional information, please see Part E – ADA/MAAB References – Building Blocks for Protruding Objects.

Interior Routes and Circulation Paths (cost estimate – up to \$1,000)

 Remove stored items and articles from all classroom to classroom paths to ensure a 32-inch minimum clear width.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Accessible Routes.

Signage (cost estimate – up to \$5,000)

- 1. Provide Braille and raised characters on all permanent designation signage;
- 2. Ensure designation signage is not blocked by artwork.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 3 - Toilet Rooms

Toilet Rooms (cost estimate – up to \$1,000)

- 1. Install accessible door hardware on multiuser toilet rooms.
- Make minor modifications to adult toilet rooms.
- Ensure that there are an adequate number of toilet rooms for each age group served.
 Note that there are specific ADA and MAAB toilet and sink requirements for Pre-K, K-3, and 4-6.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Toilet and Bathing Rooms.

Priority 4 - Additional Access

Classroom Lavatories (cost estimate – up to \$1,000)

 Institute procedures to provide hand soap and paper towels on the sink counter to address reach range obstacles.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Lavatories and Sinks.

Drinking Fountain (cost estimate – up to \$5,000)

Either remove bottom row of CMU blocks or build out inset wall and re-install drinking fountain to provide the required depth of knee and toe clearance.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Drinking Fountains.

Safety & Usability Recommendations

Elevators (cost estimate – up to \$5,000)

- 1. Schedule yearly maintenance and inspections.
- Provide and verify backup power source for elevator to address F.N.S.S. emergency shelter needs.

Toilet Rooms (cost estimate – up to \$25,000)

1. Provide accessible shower / locker rooms to address F.N.S.S. emergency shelter needs.

Stairways (cost estimate – up to \$10,000)

- 1. Close off stairs at ramp to stage by installing a railing on the top step.
- Develop policies and procedures to ensure the evacuation of individuals unable to navigate stairs;
- 3. Acquire Evacuation Chairs.
- Engage NFPA (Allan Fraser) to assist with staff training and locating of evacuation chairs.





Brown School

S2 - Brown School

Building Description

Located at the intersection of Kidder, Willow and Josephine Avenues, the Brown School is a three-story, brick structure with public and staff spaces on the first and second floors as well as the basement.

The building has entrances on two sides: on Willow and Josephine Avenues. Neither of these entrances is accessible since stairways are provided to the first floor. At Kidder Avenue there is an unmarked non-compliant accessible entrance with an interior ramp into the basement. However, there is no elevator provided for vertical circulation to all floor levels.

No off-street staff and public parking spaces are provided.

Toilet rooms for staff and public use are located on each floor and a single-user toilet room in the basement is minimally accessible.

Services to the public are offered on all floor levels.

Structural Accessibility

While it was designed and built prior to state and federal accessibility regulations and has undergone some accessibility upgrades, the City has ongoing obligations for accessibility:

The City must ensure that the public can access the programs, services and activities at the Brown School.

Aside from modifying policies and procedures to ensure programmatic access, this also means:

- Elements that were not constructed in compliance with code must be corrected to current standards.
- As alterations and renovations are undertaken, elements that are not accessible must be brought into compliance with current 521CMR and 2010 ADA Standards.
- Building elements that are inaccessible as a result of new standards adopted since they were built, need to be brought into compliance if they are a barrier to equal participation in programs, services and activities offered.



Photo 1



Photo 2



Photo 3

Issues

Priority 1 - Approach & Entrance

Parking & Drop-off Area

No off-street public parking is offered in this facility. Staff parking is provided on the short driveway off Kidder Avenue. (Photo 1)

No accessible parking spaces for staff as well nor an accessible drop-off area were identified in this facility.

Sidewalks and Curb Ramps

The entrances to the school are directly connected to the sidewalks along Willow, Kidder, and Josephine Avenues. Although the sidewalks and curb ramps are in good condition, a deteriorated and excessively sloped section of the sidewalk can be found along the vehicular curb on Kidder Avenue. (Photo 1)



Photo 4



Photo 5



Photo 6

Entrances

The building has entrances on two sides – on Kidder and Josephine Avenues. Neither entrance is accessible since stairways are provided to the interior floor a few feet above the exterior grade. Neither stairway has railings that comply with requirements for handrail extensions and cross section for grasping. (Photos 2 and 3)

A buzzer and intercom are placed on the entry door on Willow Avenue and are out of reach for those who may not be able to navigate the stairway. No indication of the location an accessible entrance is offered at any of the entrances mentioned above. (Photo 4)

At both intersections, small signs with the International Symbol of Accessibility and the words 'Ramp' and 'Restroom' are mounted at the corners of the building several feet away from the sidewalks. (Photo 5)

Although these signs refer to the entrance located near the parking space on Kidder Avenue, the entrance is not identified as the accessible entrance. Further, no intercom is provided at this remote locked entrance to alert employees those in need of assistance. (Photo 6)



Photo 7



Photo 8



Photo 9

Priority 2 – Access to Goods & Services

Doors

Throughout the building, several single- and double-leaf doors exceed the maximum allowable force required to open them and do not have the minimum clear width for accessible doors, especially the entry and vestibule doors. Several entry doors and doors to classrooms and toilet rooms have non-compliant hardware. (Photo 7)

Floor Surfaces

At circulation areas as well as certain offices, several weather mats are not secure and can become tripping hazards to faculty and students. (Photo 8)

Similar to weather mats, grates with large openings can also become tripping hazards to customers and staff. (Photo 9)

Protruding Object

In the corridor on the second floor, a wall-mounted external automatic defibrillator is a protruding object, which increases the likelihood of injuries among people with low or no vision or others who may be unobservant.



Photo 10



Photo 11



Photo 12

Ramp

An interior ramp connects the accessible entrance on Kidder Avenue to the basement level. Not only does this ramp exceed the maximum allowable running slope, but it also is obstructed by equipment and storage. (Photo 10)

Stairways

Exterior steps and stairs at Kidder and Josephine Avenues are missing handrails or have handrails that do not meet dimensional requirements. (Photos 2 and 3)

At both entrances, egress stairways offer vertical circulation to all floor levels. Neither stairway has compliant handrails. (Photo 11)

Signage

Very little signage is provided at this facility and not all permanent rooms and spaces are properly identified with ADA-compliant signs. (Photo 12)



Photo 13



Photo 14



Photo 15

Priority 3 – Toilet Rooms

Toilet Rooms

A unisex, multi-user toilet room for student use is located on the basement level. This toilet room is inaccessible because the lavatories are mounted too low which obstructs the required knee clearance, plumbing underneath the lavatories is unprotected, the mirror above the lavatories exceeds the maximum allowable height, and accessible urinals and stalls are not provided. (Photos 13 and 14)

Also, on the basement level, a single-user toilet room is provided. Although this toilet room is generally usable by persons with disabilities, it does not meet all of the requirements of applicable accessibility standards because the toilet exceeds the maximum allowable height, the side grab bar is mounted at an incorrect height and the rear grab bar is missing, and the flush valve is mounted on the incorrect side of the toilet.

A set of multi-user toilet rooms (one for each gender) for faculty use can be found on the third floor. Although those toilet rooms offer several accessible features, they are not located on an accessible route.

Signage

Although an ISA sign has been installed on the door to the single-user toilet room on the basement level, none of the toilet rooms in the building have accessible signage. (Photo 15)



Photo 16

Priority 4 – Additional Access

Drinking Fountains

Drinking fountains are provided on most floor levels. All are inaccessible because they lacked sufficient clearance and or had inaccessible controls that required twisting.



Photo 17



Photo 18

Recommendations

Priority 1 – Approach & Entrance

Parking & Drop-off Area (cost estimate – up to \$10,000)

 Convert the parking space into a van designated parking space. Re-grading the existing paved are may be necessary.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and General Site and Building Elements for Accessible Parking.

Sidewalks and Curb Ramps (cost estimate – up to \$10,000)

1. Repair or replace the sidewalk along the vehicular curb on Kidder Avenue.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Accessible Routes.

Entrances (cost estimate – up to \$25,000)

- Install compliant handrails on both sides of the stairways that lead to the entrances on Kidder and Josephine Avenues.
- 2. At the entrance on Willow Avenue, relocate the buzzer and intercom to a post mounted at the bottom of the stairway at street level.
- Install signage at both Willow and Josephine Avenues to indication of the location the accessible entrance on Kidder Avenue.
- 4. Provide a buzzer and intercom at the entry door on Kidder Avenue.

For additional information, please see Part E – ADA/MAAB References – Scoping for Emergency Egress and General Site and Building Elements for Stairways.

Priority 2 – Access to Goods & Services

Doors (cost estimate – up to \$5,000)

- When doors do not have the minimum clear width for accessible doors, either keep them open during regular hours or replace them with wider doors.
- 2. Replace door knobs with lever hardware.
- Create a comprehensive maintenance program and schedule to check and adjust the opening force of all exterior and interior doors. Where not possible, either keep heavy doors open during regular hours or add automatic openers.
- Provide an automatic opener wherever doors do not have the required maneuvering clearance on their latch side. Prioritize entry doors and doors to toilet rooms.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Doors, Doorways, and Gates.

Floor Surfaces (cost estimate – up to \$1,000)

- Secure all weather mats with industrialstrength double-stick tape. Alternatively, replace them with recessed walk-off mats or grates.
- 2. Replace grates with opening no wider than 1/2-inch.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Floor Surfaces.

Protruding Objects (cost estimate – up to \$1,000)

 Install a cane-detectable barrier to protect the external automatic defibrillator in the corridor on the second floor. Canedetectable barriers could be trash cans, fixed panels, furniture, or other permanent barriers.

For additional information, please see Part E – ADA/MAAB References – Building Blocks for Protruding Objects.

Ramp (cost estimate – up to \$10,000)

- Re-grade the interior ramp that connects the entrance on Kidder Avenue to the basement level.
- 2. Remove all obstruction along the ramp.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Ramps.

Stairways (cost estimate – up to \$10,000)

- Install compliant handrails on both sides of the egress stairways on all floor levels.
- Develop policies and procedures to evacuate individuals unable to navigate stairs.

For additional information, please see Part E – ADA/MAAB References – Scoping for Emergency Egress and General Site and Building Elements for Stairways.

Signage (cost estimate – up to \$10,000)

 Implement a comprehensive signage plan to ensure that ADA-compliant signs are installed alongside all doors to identify permanent rooms and spaces.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 3 – Toilet Rooms

Toilet Rooms (cost estimate – up to \$10,000)

- Make the following improvements to the single-user toilet room on the basement level:
 - a. Lower the toilet room so that its seat is no higher than 19 inches above the floor.
 - Raise the side grab bar and install a rear grab bar so that they are mounted between 33 inches and 36 inches above the floor.
 - c. Relocate the flush valve to the opposite side of the toilet.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Toilet and Bathing Rooms.

Signage (cost estimate – up to \$1,000)

Install accessible signage at all toilet rooms.
 Where toilet rooms are inaccessible,
 signage should direct faculty and students
 to the closest accessible toilet room in the
 facility.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 4 - Additional Access

Drinking Fountain (cost estimate – up to \$1,000)

 Either provide an accessible drinking fountain near the accessible toilet room on the basement level or provide an adjacent water cooler with cups for equivalent access at the inaccessible drinking fountain.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Drinking Fountains.





Capuano School

S3 - Capuano School

Building Description

Located at 150 Glen Street is a 2 story L-shaped building constructed primarily with brick and concrete masonry units in 2002 and opened in 2003. The building is designed for early childhood education up through kindergarten and provides activities until 5:30 p.m. The school abuts a soccer field and a playground that were constructed in conjunction with the school.

Located on a flat site, the building's main entrance and three staff only entrances are at grade, essentially the same as adjacent sidewalks. Intercoms and security systems are present.

Though the school is a designated emergency shelter for Somerville, MEMA, and FEMA use, the school lacks accessible showers for shelter use beyond 48 hours and may require backup power for refrigeration and elevator usage.

An accessible drop-off is provided on Glen Street. No public off-street public parking spaces are provided at this facility. As one would expect for a new school, an elevator and multiple egress stairways offer vertical circulation to both floor levels. Likewise, giving the young population served, single user toilet rooms are abundant, generally in each classroom. Toilet rooms for staff are provided on all floors. Toilet rooms for public use are located at the main office and at the cafetorium.

Services to students and or the public are offered on both floor levels. Aside from the typical issues of doors that exceed the maximum allowable opening force, unsecured carpets, and some relatively minor issues in toilet rooms, overall accessibility is quite good.

Structural Accessibility

While most of the building elements were designed and built in accordance to state and federal accessibility regulations, the City has ongoing obligations for accessibility:

The City must ensure that students and the public can access the programs, services and activities at the Capuano School.

Aside from modifying policies and procedures to ensure programmatic access, this also means:

- Elements that were not constructed in compliance with code must be corrected to current standards.
- As alterations and renovations are undertaken, elements that are not accessible must be brought into compliance with current 521CMR and 2010 ADA Standards.
- Building elements that are inaccessible as a result of new standards adopted since they were built, need to be brought into compliance if they are a barrier to equal participation in programs, services and activities offered.

Building Summary and Recommendations

Similar to other new buildings within Somerville, the Capuano School has few typical accessibility concerns that impact student access beyond issues with furniture arrangement and lack of evacuation chairs. For staff and faculty, there may be issues with excessively weighted doors or furniture arrangement in staff only spaces. Additionally, there are the following issues:

- Routes between classrooms are compromised by storage, furniture, unsecured carpets and protruding objects.
- Faculty/staff kitchenettes are largely accessible apart from reach ranges to certain appliances.
- Where provided, designating signage is frequently installed in incorrect locations and lacks raised characters, Braille and other required accessibility features;
- Evacuation chairs and Areas of Refuge/Rescue Assistance are not provided.
- The school lacks accessible showers for emergency shelter use beyond 48 hours and may require backup power for refrigeration and elevator usage.

Alongside the development of policies and procedures to address a number of conditions, given these overall findings, the following projects should be undertaken:

 Make minor modifications to existing multiuser toilet rooms

Safety and Usability Recommendations

- Schedule yearly maintenance and inspections;
- Provide and verify backup power source for elevator to address F.N.S.S. emergency shelter needs;
- 3. Acquire evacuation chairs and locate in at front and rear second floor stairwells.
- 4. Consider installing one or more accessible showers to meet emergency shelter needs;
- Consider providing backup power for elevator and refrigeration to meet emergency shelter needs.



Photo 1



Photo 2



Photo 3

Issues

Priority 1 – Approach & Entrance

Parking & Drop-off Area

In the parking lot off Franklin Street there are 11 parking spaces total and one accessible parking space with 96-inch wide access aisle that is not highly visible and missing sign. At the parking lot off Turner Court there are 12 parking spaces total with two accessible parking spaces that have a 96-inch wide access aisle that is not highly visible. Additionally, the van designated and standard M.G.L. sign is missing, and the ISA signs are below 5 feet above the ground. (Photo 1 and 2)

Sidewalks and Curb Ramps

Sidewalks abutting the Capuano School along Glen and Franklin Streets were rebuilt when the school opened. No major issues were identified apart from portions of sidewalk abutting the soccer field that had cross slopes in excess of 1:50 and catch basins that had openings greater than ½ inch and were tripping hazards. At least one curb ramp lacks a level landing. (Photo 3)

Entrances

The building has one public entrance on Glen Street as well as locked employee only entrances. Each entrance is at grade and has double doors. The main entrance is visible from the office however the intercom lacks accessible signage.



Photo 4



Photo 4



Photo 5

Priority 2 – Access to Goods & Services

Specific Academic and Extra-Curricular Spaces

Schools by nature have many specific and highly customized spaces. The Capuano School serves a pre-Kindergarten to Kindergarten population. While not every space was available for surveying, the Capuano is likely similar to other schools insofar as specific customized spaces are limited to computer workstations that may lack knee and toe clearance.

Elevators

One elevator is provided in this school appears to meet current elevator code.

Doors

Throughout the building, the following door issues were identified:

- Many doors have reduced maneuvering clearance on the latch pull side or cannot open a full 90 degrees because of furniture or stored items;
- Some single- and double-leaf doors exceed the maximum allowable force required to open them.

Floor Surfaces

The Capuano School has the following conditions floor surface issues:

- Unsecured weather mats at entrance doors and drinking fountains; (Photos 3 and 4)
- Unsecured carpets in classrooms.



Photo 5



Photo 6



Photo 7

Protruding Objects

Throughout the circulation path in the building, hazardous protruding objects increase the possibility of injury to visitors and staff. At the Capuano, the most obvious is the low-hanging wood structure and clock in the Media Center. (Photo 5) Additional protruding objects generally include, but are not limited to, the following:

- hanging TVs and network/data boxes;
- · automatic external defibrillator
- fire extinguishers;
- underside of egress stairways; (Photo 5)
- shelves. (Photo 6)

Stairways

Multiple egress stairways offer vertical circulation to all floor levels. However no stairwell is designated as an Area of Refuge nor equipped with an evacuation chair. Some stairways such as adjacent to the music department and in the front of the library have become de facto storage closets with landings and treads occupied by objects.

Interior Routes

In schools, it is not uncommon to find inaccessible or compromised interior routes. In the survey of the Capuano School, the following conditions were identified:

 Access between classrooms is often obstructed by furniture or less than 32-inch clear width.

Signage

Virtually all permanent rooms and spaces have accessible designating signage; however, there are some issues:

 Classroom designation signage is covered by artwork.



Photo 8



Photo 9



Photo 10

Priority 3 – Toilet Rooms

Toilet Rooms

Toilet rooms for students are found in most classrooms and some are designed for their target age population. Toilet rooms for staff are provided on all floors in all buildings. Toilet rooms for public use are located at the main office and at the gym. (Photos 6, 7, and 8) Looked at in entirety, the Capuano's toilet rooms are in very good shape but a number of specific issues were identified.

Staff toilet rooms generally are single user and accessible. The following issues were identified:

- The toilet is incorrectly mounted or does not meet dimensional requirements;
- Stall dispensers are mounted incorrectly;
- Mirrors or coat hooks are missing or are mounted too high;
- Lavatories lack sufficient knee clearance, and or wrapped pipes;
- Mirrors are missing or are mounted incorrectly.

Locker and Shower Rooms

A shower room is provided in the gym however it is completely inaccessible, despite the school being designated as an emergency shelter. This appears to be the only shower in the building. (Photo 9)

Priority 4 – Additional Access Classroom Lavatories

Most classrooms have counter inset sinks but soap and paper towel dispensers are located beyond reach ranges.

Employee Spaces

The microwave in the main office has controls located above 60 inches above the floor and could be subject to an employee accommodation request. (Photo 10)

Recommendations

Priority 1 – Approach & Entrance

Parking & Drop-off Area (cost estimate up to 5,000)

- 1. Establish a plan to re-stripe existing accessible spaces and access aisles.
- Ensure that each Accessible and Van Accessible space is identified with a sign mounted between 60 and 96 inches above the ground.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and General Site and Building Elements for Accessible Parking.

Sidewalks and Curb Ramps (cost estimate – up to \$10,000)

- 1. Rebuild curb ramps that lack level landings
- Replace drains and catch basins that have openings greater than 1/2 inch or are tripping hazards.
- 3. Where possible reduce cross slopes.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Accessible Routes.

Entrances (cost estimate – up to \$1,000)

- Identify main accessible entrance with ISA symbol.
- 2. Provide accessible signage at intercom.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 2 – Access to Goods & Services

Specific Academic and Extra-Curricular Spaces

Term: (cost estimate – up to \$1,000)

 Develop policies and procedures to ensure students can access and participate in all programs, services and activities held in or utilizing specific academic and extracurricular spaces.

Long Term: (cost estimate – up to \$5,000)

1. Provide an accessible version of each type of workstation:

For additional information, please see Part E – ADA/MAAB References.

Doors & Gates (cost estimate – up to \$1,000)

 Create a comprehensive maintenance program and schedule to check and adjust the opening force of all exterior and interior doors. Where not possible, keep doors open during regular hours.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Doors, Doorways, and Gates.

Floor Surfaces (cost estimate – up to \$1,000)

- Secure all weather mats with industrialstrength double-stick tape. Alternatively, replace them with recessed walk-off mats or grates.
- 2. Secure all carpets.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Floor Surfaces.

Protruding Objects (cost estimate – up to \$1,000)

Install cane-detectable barriers below wall-mounted light fixtures, hand sanitizers, and old-fashioned drinking fountains. Cane-detectable barriers could be trash cans, fixed panels, furniture, or other permanent barriers.

For additional information, please see Part E – ADA/MAAB References – Building Blocks for Protruding Objects.

Stairways (cost estimate – up to \$1,000)

 Develop policies and procedures to ensure the evacuation of individuals unable to navigate stairs.

For additional information, please see Part E – ADA/MAAB References – Scoping for Emergency Egress and General Site and Building Elements for Stairways.

Interior Routes and Circulation Paths (cost estimate – up to \$1,000)

1. Remove stored items and articles from all classroom to classroom paths to ensure a 32-inch minimum clear width.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Accessible Routes.

Signage (cost estimate – up to \$1,000)

Ensure designation signage is not blocked by artwork.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 3 – Toilet Rooms

Toilet Rooms

Short Term (cost estimate – up to \$1,000)

- Make minor modifications to adult toilet rooms.
- Ensure that there are an adequate number of toilet rooms for each age group served.
 Note that there are specific ADA and MAAB toilet and sink requirements for Pre-K, K-3, and 4-6.

Long Term (cost estimate – up to \$10,000)

1. Provide an accessible shower

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Toilet and Bathing Rooms.

Priority 4 – Additional Access

Classroom Lavatories (cost estimate – up to \$1,000)

1. Institute procedures to provide hand soap and paper towels on the sink counter.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Lavatories and Sinks.

Safety & Usability Recommendations

Elevators (cost estimate – up to \$5,000)

- 1. Schedule yearly maintenance and inspections.
- 2. Provide and verify backup power source for elevator to address F.N.S.S. emergency shelter needs.

Toilet Rooms (cost estimate – up to \$25,000)

1. Provide accessible shower / locker rooms to address F.N.S.S. emergency shelter needs.

Stairways (cost estimate – up to \$10,000)

- 1. Acquire Evacuation Chairs.
- 2. Engage NFPA (Allan Fraser) to assist with staff training and locating of evacuation chairs.





Edgerly Education Center

S4 – Edgerly Education Center

Building Description

Located at Cross Street, the Edgerly Education Center is a three-story brick structure built between Bonair and Otis Streets. This facility houses two separate alternative middle and high schools – Next Wave Middle School and Full Circle High School – on the second and third floors as well portion of the East Somerville Community School on the first and second floors while a new school building is constructed a few blocks away.

Located on a flat site, an at-grade entrance is provided on Bonair Street while multiple other inaccessible entrances can be found along Bonair and Otis Streets. Although a few signs are offered at inaccessible entrances to indicate the direction to the accessible entrance, getting into the building can be extremely confusing.

One accessible parking space is provided in the small parking lot off Otis Street, which is at least 400 feet away from the accessible entrance on Bonair Street. To add to the confusion for those arriving at this facility for the first time, a ramp that leads to an inaccessible entrance is located near the accessible parking space. The Edgerly Education Center has no outdoor recreational space, so activities are held at nearby Foss Park and other recreational areas.

Egress stairways offer vertical circulation to all floor levels. Neither stairway has compliant handrails. An elevator connecting all floor levels is provided in this facility.

Structural Accessibility

While it was designed and built prior to state and federal accessibility regulations and has undergone some accessibility upgrades, the City has ongoing obligations for accessibility:

The City must ensure that the public can access the programs, services and activities at the Edgerly Education Center.

Aside from modifying policies and procedures to ensure programmatic access, this also means:

- Elements that were not constructed in compliance with code must be corrected to current standards.
- As alterations and renovations are undertaken, elements that are not accessible must be brought into compliance with current 521CMR and 2010 ADA Standards.
- Building elements that are inaccessible as a result of new standards adopted since they were built, need to be brought into compliance if they are a barrier to equal participation in programs, services and activities offered.



Photo 1



Photo 2



Photo 3

Issues

Priority 1 - Approach & Entrance

Parking & Drop-off Area

Off-street public parking is offered in a small parking lot off Otis Street. One accessible van parking space for public or staff was identified near the ramp that leads to an inaccessible entrance. While the access aisle is compliant, the parking space exceeds the maximum allowable cross slope and the sign does not meet the minimum allowable height. (Photos 1 and 2)

Additionally, this accessible parking space is at least 400 feet away from the accessible entrance on Bonair Street.

No drop-off area was identified in this facility.

Sidewalks and Curb Ramps

The entrances to the school are directly connected to the sidewalks along Cross, Bonair, and Otis. Except for a compliant curb ramp at the intersection of Cross and Bonair Street, all other curb ramps are in poor condition. (Photo 2)

Deteriorated sidewalks can be found along all sides of this facility.



Photo 4



Photo 5



Photo 6

Entrances

An at-grade entrance is provided on Bonair Street. This entrance is identified by a sign with the International Symbol of Accessibility and an intercom is provided. (Photo 4)

Along Bonair and Otis Streets, multiple other inaccessible entrances can be reached via stairways. Neither stairway has railings that comply with requirements for handrail extensions and cross section for grasping. (Photos 5 & 6)

Although a few signs are offered at inaccessible entrances to indicate the direction to the accessible entrance, getting into the building can be extremely confusing.



Photo 7



Photo 8



Photo 9

Priority 2 - Access to Goods & Services

Doors

Throughout the building, several single- and double-leaf doors exceed the maximum allowable force required to open them and do not have the minimum clear width for accessible doors. Narrow doors include, but are not limited to, doors to the gymnasium on the second floor, classrooms on all floor levels (especially on the first floor), resource room and occupational therapy room on third floor, and toilet rooms, corridors, and egress stairways on all floor levels.

Additionally, numerous doors have noncompliant hardware and do not have the minimum maneuvering clearance required to open them. (Photo 7)

Floor Surfaces

At circulation areas as well as certain offices, several weather mats are not secure and can become tripping hazards to faculty and students. (Photo 8)

Sale & Service Counters

On the second floor, the counter in the administration office exceeds the maximum allowable height for faculty, students, or visitors using wheeled mobility devices or who are of short stature. (Photo 9)

Interior Route

On the second floor, a stage is found inside the gym. No accessible route is provided between the gym level and the stage. (Photo 10)



Photo 10



Photo 11



Photo 12

Specific Academic and Extra-Curricular Spaces

Schools by nature have many specific and highly customized spaces such as biology and chemistry labs, lab preparation rooms, etc. There is an obligation for students to be able to participate in all academic and extra-curricular activities. Likewise, faculty and staff may request individual accommodations. While IHCD was not able to confirm dates of renovations or access every classroom and lab nor able to visit all spaces, the following issues were identified:

- each type of science lab lacked a permanent or moveable accessible student lab station;
- specialized work stations, including computer stations, may require extended forward reach ranges and or lack knee/toe clearance. (Photo 11)
- safety equipment such as blankets, showers, and eye wash stations were blocked by furniture, located outside of reach range, or were otherwise inaccessible.

Work Surfaces

Specific workstations such as those with computers do not provide the required knee and toe clearance. (Photo 11)

Stairways

Multiple egress stairways offer vertical circulation to all floor levels. Neither stairway has compliant handrails.

Signage

Very little signage is provided at this facility and not all permanent rooms and spaces are properly identified with ADA-compliant signs. (Photo 12)



Photo 13



Photo 14



Photo 15

Priority 3 – Toilet Rooms

Toilet Rooms

A unisex, single-user toilet room for staff and student use is located on the second floor. Although this toilet room is generally usable by persons with disabilities, it does not meet all of the requirements of applicable accessibility standards because the mirror above the lavatory exceeds the maximum allowable height and the side grab bar is mounted incorrect. (Photo 13)

Multi-user toilet rooms for staff and student use are found on all floor levels. Neither toilet rooms are accessible because plumbing underneath lavatories is unprotected, accessible toilet stalls are not provided, nor do accessories or fixtures meet height requirements for children. (Photo 14)

Signage

Although a sign has been installed on the door to the single-user toilet room on the second floor, none of the toilet rooms in the building have accessible signage. (Photo 15)



Photo 16



Photo 17



Photo 18

Priority 4 - Additional Access

Drinking Fountains

Drinking fountains are provided on all floor levels. All are inaccessible because they lacked sufficient clearance and or had inaccessible controls that required twisting.

Lockers

On all floor levels, lockers for student storage are found along corridor. Accessible lockers were not identified in this facility.

Recommendations

Priority 1 – Approach & Entrance

Parking & Drop-off Area (cost estimate – up to \$10,000)

1. Re-grade or relocate the accessible parking space to a level area.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and General Site and Building Elements for Accessible Parking.

Sidewalks and Curb Ramps (cost estimate – up to \$50,000)

 Repair or replace the sidewalks along Cross, Bonair, and Otis.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Accessible Routes.

Entrances (cost estimate – up to \$25,000)

- Install compliant handrails on both sides of all stairways that lead to the entrances on Bonair and Otis Streets.
- 2. Improve the signage at all inaccessible entrances.

For additional information, please see Part E – ADA/MAAB References – Scoping for Emergency Egress and General Site and Building Elements for Stairways and Communication Elements and Features for Signs.

Priority 2 – Access to Goods & Services

Doors (cost estimate – up to \$25,000)

- When doors do not have the minimum clear width for accessible doors, either keep them open during regular hours or replace them with wider doors.
- 2. Replace door knobs with lever hardware.
- Create a comprehensive maintenance program and schedule to check and adjust the opening force of all exterior and interior doors. Where not possible, either keep heavy doors open during regular hours or add automatic openers.
- Provide an automatic opener wherever doors do not have the required maneuvering clearance on their latch side. Prioritize entry doors and doors to toilet rooms.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Doors, Doorways, and Gates.

Floor Surfaces (cost estimate – up to \$1,000)

 Secure all weather mats with industrialstrength double-stick tape. Alternatively, replace them with recessed walk-off mats or grates.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Floor Surfaces.

Sales and Service Counters (cost estimate – up to \$1,000)

- Short term: Provide an auxiliary counter with a maximum height of 36 inches in close proximity to the main counter, or provide equivalent facilitation. Equivalent facilitation may be provided in the form of a folding shelf attached to the main counter, an auxiliary table nearby, a clipboard made available to the public, or other means.
- Long Term: Provide an accessible counter inside the administration office on the second floor.

For additional information, please see Part E – ADA/MAAB References – ADA Reference – Built-in Elements for Sales and Service Counters.

Accessible Route (cost estimate – TBD depending on scope)

 Develop access to the stage inside the gym on the second floor.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Accessible Routes.

Specific Academic and Extra-Curricular Spaces

Short Term: (cost estimate – up to \$1,000)

- Develop policies and procedures to ensure students can access and participate in all programs, services and activities held in or utilizing Specific academic and extracurricular spaces.
- Remove barriers to safety equipment including kill switches, fire blankets, emergency showers and eye wash stations.

Long Term: (cost estimate – in excess of \$25,000)

- 3. Provide an accessible version of each type of science and shop workstation.
- 4. Ensure that at least one of each computer work surface is accessible.
- 5. Ensure access to and around accessible teaching stations and lab preparation areas.

For additional information, please see Part E – ADA/MAAB References.

Stairways (cost estimate – up to \$50,000)

- 1. Install compliant handrails on both sides of the egress stairways on all floor levels.
- Develop policies and procedures to evacuate individuals unable to navigate stairs.

For additional information, please see Part E – ADA/MAAB References – Scoping for Emergency Egress and General Site and Building Elements for Stairways.

Signage (cost estimate – up to \$25,000)

 Implement a comprehensive signage plan to ensure that ADA-compliant signs are installed alongside all doors to identify permanent rooms and spaces.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 3 – Toilet Rooms

Toilet Rooms (cost estimate – up to \$10,000)

- 1. Make the following improvements to the single-user toilet room on the second floor:
 - Raise the side grab bar so that is horizontal and is mounted between 33 inches and 36 inches above the floor.
 - b. Lower the mirror above the lavatory so that its reflective surfaces are no higher than 40 inches above the floor.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Toilet and Bathing Rooms.

Signage (cost estimate – up to \$1,000)

Install accessible signage at all toilet rooms.
 Where toilet rooms are inaccessible,
 signage should direct faculty and students
 to the closest accessible toilet room in the
 facility.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 4 - Additional Access

Drinking Fountain (cost estimate – up to \$10,000)

 Either provide an accessible drinking fountain on each floor level or provide an adjacent water cooler with cups for equivalent access at the inaccessible drinking fountains.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Drinking Fountains.

Lockers

(cost estimate – up to \$5,000)

 Provide at least 5 percent, but no fewer than one of each type of lockers, of accessible lockers on each floor level. Accessible lockers can be accomplished by refurbishing existing lockers or installing new ADA-compliant lockers.

For additional information, please see Part E – ADA/MAAB References – ADA Reference – Special Rooms, Spaces and Elements for Storage.





Healey School

S5 – Healey School

Building Description

Located at 5 Meacham Street, the Healey School is a 3 story building constructed primarily with brick and concrete masonry units that opened in 2007. The building is designed for kindergarten through Grade 8 and provides activities until 5:30 p.m. The school abuts athletic courts and a playground that were constructed in conjunction with the school.

Located on a flat site, the building's main entrance and staff only entrances are at grade, essentially the same as adjacent sidewalks. Intercoms and security systems are present.

Though the school is a designated emergency shelter for Somerville, MEMA, and FEMA use, the school lacks accessible showers for shelter use beyond 48 hours and may require backup power for refrigeration and elevator usage.

No accessible drop-off is provided but a limited number of public off-street public parking spaces are provided at this facility.

As one would expect for a new school, an elevator and multiple egress stairways offer vertical circulation to both floor levels. Likewise, giving the diverse ages served, single user toilet rooms are found in many classrooms.

Toilet rooms for staff are provided on all floors.

Toilet rooms for public use are located at the main office and at the cafetorium.

Services to students and or the public are offered on all floor levels. Aside from the typical issues of doors that exceed the maximum allowable opening force, unsecured carpets, and some relatively minor issues in toilet rooms, overall accessibility is quite good.

Structural Accessibility

While most of the building elements were designed and built in accordance to state and federal accessibility regulations, the City has ongoing obligations for accessibility:

The City must ensure that students and the public can access the programs, services and activities at the Healey School.

Aside from modifying policies and procedures to ensure programmatic access, this also means:

- Elements that were not constructed in compliance with code must be corrected to current standards.
- As alterations and renovations are undertaken, elements that are not accessible must be brought into compliance with current 521CMR and 2010 ADA Standards.
- Building elements that are inaccessible as a result of new standards adopted since they were built, need to be brought into compliance if they are a barrier to equal participation in programs, services and activities offered.

Building Summary and Recommendations

Similar to other new buildings within Somerville, the Healey School has few typical accessibility concerns that impact student access beyond issues with furniture arrangement and lack of evacuation chairs. For staff and faculty, there may be issues with excessively weighted doors or furniture arrangement in staff only spaces.

 Accessible parking spaces are inadequate in number and lack compliant, striping and signage;

- 2. Maintenance of accessible features including dispensers, accessible stall locks and toilets is needed:
- Accessible routes to athletic facilities and playgrounds are not identified and gates are inaccessible;
- 4. Accessible workstations are not provided in specialized areas such as computer labs;
- Low-hanging classroom TVs are protruding objects;
- Routes between classrooms are compromised by storage, furniture, unsecured carpets and protruding objects;
- 7. Single user accessible toilet rooms are frequently used for storage;

Though not required by code:

- Evacuation chairs and Areas of Refuge/Rescue Assistance are not provided;
- The school lacks accessible showers for emergency shelter use beyond 48 hours and may require backup power for refrigeration and elevator usage.

Alongside the development of policies and procedures to address a number of conditions, given these overall findings, the following projects should be undertaken:

- Repair accessible dispensers, stall door hardware and toilets;
- Provide and identify accessible routes to each type of athletic facilities and playground as well as provide accessible gates;
- 3. Make minor modifications to existing multiuser toilet rooms:
- Establish policies and procedures to prevent storage of materials in single user toilet rooms.



Photo 1



Photo 2



Photo 3

Issues

Priority 1 – Approach & Entrance

Parking & Drop-off Area

There are 38 off-street staff and public parking spaces adjacent to the building. The following issues were identified: (Photo 1)

- only one accessible space is provided when two are required;
- access aisles are not striped;
- signage is not mounted between 60 and 96 inches above the ground.

An accessible drop-off area is provided at the main entrance of this facility.

Sidewalks and Curb Ramps

Sidewalks abutting the Healey School along Meacham Street were rebuilt when the school opened. No major issues were identified apart from portions of sidewalk that had cross slopes in excess of 1:50 and an asphalt patch covering a trench that was not flush with adjacent surfaces and had settled in some areas. (Photo 2)

Entrances

The building has one public entrance on Meacham Street as well as locked employee only entrances. Each of the entrances occur at grade and have double doors. The main entrance is visible from the office, however, the intercom lacks accessible signage and its clear space is blocked by a flower planter. (Photo 3)



Photo 4



Photo 5



Photo 6

Priority 2 - Access to Goods & Services

Specific Academic and Extra-Curricular Spaces

The following issues were identified:

- computer and library media lab work surfaces provided less than 27 inches of knee clearance, no accessible stations were found; (Photo 4)
- each type of science lab lacked a permanent or moveable accessible student lab station; (Photo 5)
- emergency equipment such as eyewash stations may require extended forward reach ranges and or lack knee/toe clearance. (Photo 6)

Additionally, the Healey School serves a Kindergarten to Grade 8 population and appears to have certain single user toilet rooms designed for children of different ages. Those designed for grades K-3 or 4-6 should be serving the respective grades.

Elevators

One elevator is provided in this school. However, the elevator inspection certificate is expired.



Photo 7



Photo 8



Photo 9

Doors

Throughout the building, the following door issues were identified:

- Gates to athletic facilities lack smooth surfaces and accessible hardware;
- A few doors have reduced maneuvering clearance on the latch pull side or cannot open a full 90 degrees because of furniture or stored items;
- Some single- and double-leaf doors exceed the maximum allowable force required to open them.

Floor Surfaces

The Healey School has the following conditions floor surface issues:

- Unsecured weather mats at entrance doors and drinking fountains;
- Unsecured carpets in classrooms. (Photo 7)

Protruding Objects

Throughout the circulation path in the building, hazardous protruding objects can increase the possibility of injury to visitors and staff. Few major objects were identified however staff should be aware that protruding objects generally include, but are not limited to, the following:

- hanging TVs and network/data boxes; (Photo 8)
- · display cases;
- automatic external defibrillator
- fire extinguishers;
- underside of egress stairways. (Photo 9)

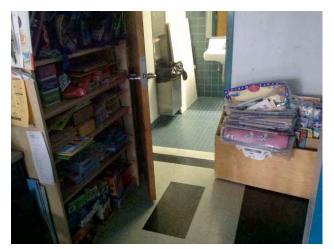


Photo 10



Photo 11



Photo 12

Stairways

Multiple egress stairways offer vertical circulation to all floor levels. However no stairwell is designated as an Area of Refuge nor equipped with an evacuation chair.

Interior Routes

In schools, it is not uncommon to find inaccessible or compromised interior routes. In the survey of the Healey School, the following conditions were identified:

 Access between classrooms or in toilet rooms is sometimes obstructed by furniture. (Photo 10 and 11)

Signage

Virtually all permanent rooms and spaces have designating signage however there are some issues:

- Braille was typically missing from signage
- Classroom designation signage is covered by artwork;
- Accessible entrances have worn or are missing ISA symbol. (Photo 12)



Photo 13



Photo 14



Photo 15

Priority 3 – Toilet Rooms

Toilet Rooms

Toilet rooms for students are found in many classrooms and some are designed for their target age population. Toilet rooms for staff are provided on all floors in all buildings. Toilet rooms for public use are located at the main office and at the cafetorium. Looked at in entirety, the Healey's toilet rooms are in good good shape but a number of specific issues were identified.

Student use toilet rooms have the following issues:

- A few toilets may be higher than 19 inches above the floor;
- Some toilets may be further than 18 inches on center from side wall;
- Height of toilet and grab bars may not match target age group designed for;
- Trash receptacles may intrude on clear floor space.

Multi-user toilet rooms generally are accessible apart from the following issues identified:

- Accessible features including dispensers, accessible stall locks and toilets were broken or missing in multi-user toilet rooms. Accessible signage identifying the toilet rooms as inaccessible and directions to accessible toilet rooms was not provided; (Photo 13)
- Urinals and urinal privacy screens reduced the accessible route clear width to less than 32 inches (for example see toilet room near classroom #211); (Photo 14)
- Urinals visible from hall lacked privacy screens (for example see toilet room near music room #310); (Photo 15)



Photo 16



Photo 17



Photo 18

- Replacement dispensers are protruding objects; (Photo 16)
- · Lavatories had exposed pipes.

Staff toilet rooms generally are single user and accessible. The following issues were identified:

- Stall dispensers are mounted incorrectly;
- Coat hooks are missing or are mounted incorrectly;
- Trash receptacles made intrude on clear floor space.
- Mirrors are missing or are mounted incorrectly.

Locker and Shower Rooms

Though not required, a shower room is not provided despite the school being designated as an emergency shelter.

Priority 4 - Additional Access

Classroom Lavatories

Most classrooms have counter inset sinks, designed for side approach but permanent soap and paper towel dispensers (where provided) are located beyond reach ranges.

Drinking Fountains

Hi-lo drinking fountains are not maintained. Older inset wall models are too high to be accessible and signage is not provided to direct users to the functioning accessible drinking fountains. (Photo 17 and 18)

Recommendations

Priority 1 – Approach & Entrance

Parking & Drop-off Area (cost estimate up to 5,000)

Establish a plan to provide at least two
accessible spaces including one van space.
This plan should assume the need to restripe existing accessible spaces. Ensure
that each Accessible and Van Accessible
space is identified with a sign mounted
between 60 and 96 inches above the
ground.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and General Site and Building Elements for Accessible Parking.

Entrances (cost estimate – up to \$1,000)

- Remove flower planter and any other objects blocking the clear space at the intercom.
- 2. Provide accessible signage at intercom.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 2 – Access to Goods & Services

Specific Academic and Extra-Curricular Spaces

(cost estimate – up to \$10,000)

Short Term:

 Short Term: Develop policies and procedures to ensure students can access and participate in all programs, services and activities held in or utilizing specific academic and extra-curricular spaces.

Long Term:

 Long Term: Provide a fixed accessible version of each type of workstation. It should be integrated with other stations and near white/black boards, screens, and demonstration / instruction area.

For additional information, please see Part E – ADA/MAAB References.

Doors & Gates (cost estimate – up to \$5,000)

- Install accessible gate surfaces and hardware on gates to athletic facilities and playgrounds;
- Create a comprehensive maintenance program and schedule to check and adjust the opening force of all exterior and interior doors. Where not possible, keep doors open during regular hours.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Doors, Doorways, and Gates.

Floor Surfaces (cost estimate – up to \$1,000)

- Secure all weather mats with industrialstrength double-stick tape. Alternatively, replace them with recessed walk-off mats or grates.
- 2. Secure all carpets.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Floor Surfaces.

Protruding Objects (cost estimate – up to \$1,000)

 Relocate objects or where not possible, install cane-detectable barriers below wallmounted light fixtures, hand sanitizers, TVs, etc. Cane-detectable barriers could be trash cans, fixed panels, furniture, or other permanent barriers.

For additional information, please see Part E – ADA/MAAB References – Building Blocks for Protruding Objects.

Stairways (cost estimate – up to \$1,000)

 Develop policies and procedures to ensure the evacuation of individuals unable to navigate stairs.

For additional information, please see Part E – ADA/MAAB References – General Site and Building Elements for Stairways.

Interior Routes and Circulation Paths (cost estimate – up to \$1,000)

 Remove stored items and articles from all classroom to classroom paths to ensure a 32-inch minimum clear width.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Accessible Routes.

Signage (cost estimate – up to \$1,000)

- 1. Provide Braille and raised characters on all permanent designation signage.
- 2. Ensure designation signage is not blocked by artwork.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 3 – Toilet Rooms (cost estimate – up to \$1,000)

- Maintain accessible features including dispensers, accessible stall locks and toilets.
- If accessible toilets are not repaired, provide signage that directs to functioning accessible toilets.
- Make minor modifications to adult toilet rooms.
- 4. Develop policies and procedures to ensure toilet rooms are not used for storage.
- Ensure that there are an adequate number of toilet rooms for each age group served.
 Note that there are specific ADA and MAAB toilet and sink requirements for K-3, and 4-6.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Toilet and Bathing Rooms.

Priority 4 - Additional Access

Classroom Lavatories (cost estimate – up to \$1,000)

1. Institute procedures to provide hand soap and paper towels on the sink counter.

Drinking Fountains (cost estimate – up to \$5,000)

- 1. Repair accessible drinking fountains.
- 2. Provide signage at inaccessible drinking fountains that directs to accessible models.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Drinking Fountains.

Safety & Usability Recommendations

Exterior

- Provide pedestrian crosswalks at entrance of parking lot on Meacham Street.
- 2. Exterior lighting at outdoor recreational areas.

Elevators (cost estimate – up to \$5,000)

- 1. Schedule yearly maintenance and inspections.
- Provide and verify backup power source for elevator to address F.N.S.S. emergency shelter needs.

Toilet Rooms (cost estimate – up to \$25,000)

1. Provide accessible shower / locker rooms to address F.N.S.S. emergency shelter needs.

Stairways (cost estimate – up to \$10,000)

- 1. Acquire Evacuation Chairs;
- Engage NFPA (Allan Fraser) to assist with staff training and locating of evacuation chairs.





High School

S6 - High School

Building Description

Located along Highland Avenue between City Hall and the Central Library and perched above the Lowell Line commuter rail tracks, Somerville High School is an interconnected six building complex made primarily of brick and concrete masonry units. Buildings A, B, C date to the early 1900's with the remaining buildings dating up to the 1980's. Older buildings are four or five stories including habitable basements. Buildings E & F are three stories, primarily housing the gymnasium and various shop classrooms, some of which have access to a rear service drive. The basement as well as first floor connects all buildings.

The building's main entrance consists of the original entrance that has stairs to Building B as well as occasional use of the accessible entrance at Building E (Gym). At some point an accessible entrance with a high-walled switch back ramp was constructed between buildings C & D. The door at the top of the ramp has an intercom and electric latch release. Functioning surveillance cameras and an automatic door opener are not present.

At least 175 off-street public parking spaces are provided at this facility; these are shared with the adjacent City Hall and Library. Staff parking is provided in the parking lot behind the building. Accessible parking spaces for public or staff are provided at the front of this facility.

As one would expect for a school, multiple egress stairways offer vertical circulation to all floor levels. However, not all buildings connect on all floors. Two elevators are provided in this school, an older and smaller model between Buildings A and B and a newer pass-through model in Building F, approximately 700 feet away. Non-functioning lifts are found in the Auditorium (for stage access) and in the library for mezzanine access.

Students are allowed to use toilet rooms in the basement of building B (near Cafeteria) and at the Gym. Elements of the student toilet rooms are the most accessible; however, their locations are significantly problematic. Toilet rooms for staff are provided on all floors in all buildings. Toilet rooms for public use are located near the main office and at the gym. Locker rooms are provided in several shops in addition to the gym.

Services to students and or the public are offered on all floor levels, including the basement. Generally speaking, the public has a regular need to access the Main and Guidance office areas, auditorium/stage as well as certain areas within buildings E & F.

Structural Accessibility

Although most of the buildings were built prior to state and federal accessibility regulations, the City has ongoing obligations for accessibility:

The City must ensure that students and the public can access the programs, services and activities at the High School.

Aside from modifying policies and procedures to ensure programmatic access, this also means:

- Elements that were not constructed in compliance with code must be corrected to current standards.
- As alterations and renovations are undertaken, elements that are not accessible must be brought into compliance with current 521CMR and 2010 ADA Standards.
- Building elements that are inaccessible as a result of new standards adopted since they were built, need to be brought into compliance if they are a barrier to equal participation in programs, services and activities offered.

Building Summary and Recommendations

Similar to other buildings within Somerville, the High School has many typical accessibility concerns, e.g. non-compliant parking, sidewalks, ramps, doors, stairways, toilet rooms, counters, protruding objects, and signage. Additionally, specialized spaces such as language and science labs as well as shop classrooms lack accessible features and work stations.

- Exterior access is problematic because of missing, broken, or non-compliant curb ramps and sidewalks. Stairs may have spalling concrete, lack handrails or existing handrails are non-compliant;
- Accessible parking spaces may be inadequate in number and lack compliant surfaces, grading, striping and signage;
- 3. Access to the building via main office is compromised because of the non-compliant exterior ramp and entry door system;
- 4. Toilet rooms and locker rooms are not accessible:
- 5. Accessible lockers are not provided;
- 6. At least one of each type of science lab or shop workstation is not accessible;
- 7. Access routes to and within portions of the music department are compromised;
- Exterior entrances and exits for certain shops including vehicle repair are not accessible and it is unclear what procedures are in place for accommodation;
- Safety features such as shop kill switches, safety showers, fire blankets, and eye wash stations are blocked by materials, and their controls are located out of reach range or are otherwise inaccessible;
- There is a lack of an internal accessible route between the auditorium, stage, backstage;
- 11. The outdoor classroom are not located on accessible routes;

- 12. The TV studio has an inaccessible exterior entrance and a circuitous accessible interior route that may not be available during all hours the studio is used. Additionally, the broadcast area is raised up two steps;
- 13. The lift to the second floor of the library is non-compliant and was not operable;
- 14. Tripping hazards and thresholds in excess of 1 inch are found throughout the building;
- 15. Many interior and exterior doors exceed the maximum allowable opening force requirements and threshold heights;
- 16. Accessible routes throughout the building and between classrooms are compromised by storage, furniture, unsecured weather mats and protruding objects;
- 17. Faculty/staff kitchenettes and other facilities are inaccessible.
- Evacuation plans were not shared and evacuation chairs and Areas of Refuge/Rescue Assistance are not provided.
- 19. Where provided, designating signage is frequently installed in incorrect locations and lacks raised characters, Braille and other required accessibility features.

Alongside the development of policies and procedures to address a number of the above conditions, given these overall findings, the following distinct projects should be undertaken promptly, likely utilizing outside professionals:

- Train staff to answer accessible entrance intercom, also consider installing video surveillance. Develop policies and procedures to ensure accessible entry during non-school hours; Immediate Priority
- Demolish and reconstruct accessible entrance ramp and entry. Consider a ramp design without walls to improve visibility, safety and security, provide a video camera, accessible intercom and automatic door opener;

- Either modify or renovate existing multi-user toilet rooms or construct one single-use accessible toilet room on each floor of buildings A, B, D, & F. Begin with upper floors as an immediate step;
- 4. Replace curb ramps and repair sidewalk surfaces;
- 5. Re-grade, resurface and re-stripe accessible parking;

Then, because of the age of the building and the complexity of these projects, the City should evaluate replacing the building instead of renovating it prior to completing the following steps:

- Replace removable floor panels and remove tripping hazards, especially at the basement level;
- 7. Provide an accessible version of each type of science and shop workstation;
- 8. Renovate various locker rooms to be accessible;
- Establish an internal accessible route between the auditorium, stage, backstage and green room;
- Provide accessible route to outdoor classroom and TV Studio between the first level and the ground level;
- 11. Replace inaccessible drinking fountains with hi-lo fountains;
- 12. Begin a building-wide, comprehensive signage project.

Safety and Usability Recommendations

- Schedule yearly elevator and lift maintenance and inspections;
- 2. Plan for eventual overhaul and modernization of elevators;
- Provide and verify backup power source for elevator to address F.N.S.S. emergency shelter needs;
- 4. Acquire evacuation chairs and locate in at front and rear second floor stairwells.
- 5. Consider installing one or more accessible showers to meet emergency shelter needs;
- Consider providing backup power for elevator and refrigeration to meet emergency shelter needs.



Photo 1



Photo 2



Photo 3

Issues

Priority 1 - Approach & Entrance

Parking & Drop-off Area

At least 175 off-street staff and public parking spaces were identified in parking lots adjacent to the building. Additional parking lots and service drives are provided off of School and Medford Streets. These additional parking lots are at least 20 feet below the high school's first floor and are accessed via multiple sets of stairs. While these lots do not have accessible parking spaces, four accessible parking spaces are provided in the lots along Highland Avenue (five, if one double counts the space in front of City Hall entrance ramp). The accessible parking spaces have several issues:

- Inadequate number of accessible spaces (6-7 required) including van accessible van parking spaces;
- one accessible parking space with 96-inch wide access aisle adjacent to city hall – markings are not highly visible, van designated sign is missing, curb ramp issues; (Photo 1)
- one accessible parking space directly across from main entrance used by staff – access aisle is missing; (Photo 2)
- three accessible parking spaces near the accessible entrance – two spaces facing building C exceed running slope slightly, one space facing building D has excessive slopes; All spaces: markings are not highly visible, sign for one accessible parking space is missing, van designated sign is missing and have curb ramp issues; (Photo 3)
- two accessible parking spaces with 96-inch wide access aisle – have slightly excessive slopes, markings are not highly visible, van designated sign is missing; (Photo 4)



Photo 4



Photo 5



Photo 6

Despite the presence of drop-off areas, no accessible drop-off area was provided at the main entrance. The Gym drop-off area is one way and thus, ramps/lifts deployed from the right side of a vehicle are in the vehicle travel lane. (Photo 5)

Sidewalks and Curb Ramps

The High School shares pedestrian and vehicular entrances along Highland Ave with City Hall and Central Library. At each driveway, sidewalks lead up the approximate 10-foot grade change from Highland Avenue. Additionally, a sidewalk runs the length of the school, descending steeply to meet the grade of the drop-off area outside of the Gym (Building E) and lacks compliant handrails on either side. Additionally, raised panels, deteriorated surfaces and broken or missing tree grates within the walkways can become tripping hazards to the public and staff. This sidewalk also connects to the walkways that lead to the playground, Central Library, and the sidewalks along Highland Avenue and Walnut Street.

The sloped walkway leading to the DayCare and rear Health Center entrance exceeds 5%, lacks level landings where walkways and doors intersect and railings. The rear health center landing does not provide the required clear space at latch pull side and card reader.

Although the sidewalks are in reasonable condition, portions of the sidewalks have vertical displacements greater than 1/2 inch, cross slopes in excess of 1:48 and no curb ramps are provided to reach flag poles.



Photo 7



Photo 8



Photo 9

Each of the curb ramps located along Highland Avenue and the High School sidewalks has one or more of the following problematic issues:

- vertical displacements at the bottom or top of curb ramp exceed maximum requirements;
- running slopes exceed 1:12;
- cross slopes exceed 1:48;
- level landings are not provided or where provided, exceed 1:48 in any direction;
- pavement surfaces are degraded. (Photo 6)

Entrances

The building has two public entrances on Highland Avenue: the main entrance at Building B and the Gym entrance at Building E. (Photos 7 and 8)

At some point an accessible entrance with a high walled switch back ramp was constructed between buildings C & D. (Photo 9)

The door is equipped with an intercom and electric latch release. Functioning surveillance cameras and an automatic door opener are not present. This entrance is problematic for a number of reasons:

- level landings are not provided;
- portions of the ramp exceed 1:12;
- portions of railings are loose or missing; and
- the entry door lacks the required level maneuvering clearance.;
- · the intercom lacks accessible signage;
- during visits, IHCD staff observed that staff appear not to be trained to answer intercom and open the door; students open the door to anyone knocking; the door is propped open occasionally;
 - off hours access appears to be problematic;



Photo 10



Photo 11



Photo 12

 finally though not a code issue, the high ramp walls block visual sight lines to the ramp from the street, parking and entrance; As a consequence, entrance users cannot be seen or look out to the parking lot. (Photo 9)

The gymnasium entrance door is equipped with an intercom and electric latch release. Functioning surveillance cameras and an automatic door opener are not present. This entrance is problematic for a number of reasons:

- · the intercom lacks accessible signage;
- staff are not trained to answer intercom and open the door; students open the door to anyone knocking; the door is propped open occasionally and finally,
- non-school hours access may be problematic.

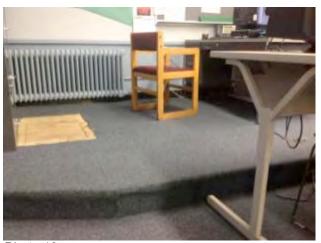


Photo 13



Photo 14



Photo 15

Priority 2 - Access to Goods & Services

Specific Academic and Extra-Curricular Spaces

Schools by nature have many specific and highly customized spaces such as biology labs, chemistry labs, lab preparation rooms, world language labs, auto and wood shops, athletic facilities, etc. There is an obligation for students to be able to participate in all academic and extra-curricular activities. Likewise, faculty and staff may request individual accommodations. While IHCD was not able to confirm dates of renovations or access every classroom, lab, or shop, nor able to visit all spaces, the following issues were identified:

- raised podiums such as in language labs lacked accessible routes; (Photo 13)
- each type of science lab lacked a permanent or moveable accessible student lab station; (Photo 14)
- risers in music rooms:
- teacher demonstration stations at front of labs lacked 5-foot turning radius between station and whiteboard as well as an accessible counter and sink;
- specialized work stations or shop equipment may require extended forward reach ranges and or lack knee/toe clearance.
- safety equipment such as blankets, showers, and eye wash stations were blocked by furniture, located outside of reach range, or were otherwise inaccessible;
- the exterior entrance vestibule to the health center lacks sufficient clear space at door.



Photo 16



Photo 17



Photo 18

Additionally, two spaces appear to lack any accessible routes to them:

- the outdoor classroom space is reachable only via stairs from its entry door; (Photo 15)
- the TV studio under the library has a stair only exterior entrance as well as a raised broadcast area. It can be accessed by first entering the daycare area, but it is unclear whether this route works when the daycare is closed. Likewise, there is no accessible route to the raised broadcast area. (Photo 16)

Elevators

Two elevators are provided in this school, an older and smaller model in Building B and a newer pass-through model in Building F approximately 750 feet away. Both meet most requirements but likely require some degree of modernization to meet current elevator safety code.

Lifts

Two lifts were identified in the High School: Auditorium and Library. The lifts were not independently operable and did not meet current lift requirements including weight capacity and were unable to lift less than the stated weight capacity. Additionally, the lift providing access to the stage is situated in such a manner that a person requiring the lift could not access back stage areas without interrupting performances on the stage. (Photo 17)

Doors

Throughout the building, the following door issues were identified:



Photo 19



Photo 20



Photo 21

- most restrooms in buildings A, B, C, & D
 have doors in a series where the outer door
 was removed long ago but the door frame
 was not. This results in constricted and
 inadequate maneuvering clearance on the
 latch pull side; (Photo 18)
- many doors lack maneuvering clearance on the latch pull side; (Photo 19)
- certain spaces have doors that do not provide the minimum 32-inch clear width for accessible doors;
- dozens of single- and double-leaf doors exceed the maximum allowable force required to open them. The worst seem to be the Main and Guidance offices as well as various doors into labs and shops;
- some doors have non-compliant hardware;
- the exterior entrance vestibule to the health center lacks sufficient clear space at door.

Floor Surfaces

The A, B, C, and D buildings of the High School have the following conditions:

- thresholds greater than 1/2 inch and often greater than one inch at many classroom doors;
- conduit, junction boxes/outlets and loose wiring on floors create tripping hazards; (Photo 20)
- in the basement hallways of these same buildings there are metal floor plates covering utilities and pipe runs. These plates may or may not be flush. In certain areas the plates or their frames are vertically displaced more than one inch; (Photo 21)
- these same buildings have large metal plates in many of the accessible toilet stalls.
 These plates are often angled toward the adjacent sidewall and radiator thus making the floors in front of and alongside the toilet uneven.



Photo 22



Photo 23



Photo 24

Protruding Objects

Throughout the circulation path in the building, hazardous protruding objects increase the possibility of injury to students and staff.

Protruding objects include, but are not limited to, the following:

- · display cases;
- · automatic external defibrillator
- fire extinguishers;
- underside of both egress stairways in the basement.

Sale & Service Counters

At the Main Office, Auto Repair, Cosmetology, and other areas, the service counters exceed the maximum allowable height for visitors using wheeled mobility devices or who are of short stature. (Photo 22)

Accessible Seating

The auditorium has two levels of seating but does not provide dispersed accessible seating despite having a capacity of over 850.

Stairways

Multiple egress stairways offer vertical circulation to all floor levels. However no stairwell is designated as an Area of Refuge nor equipped with an evacuation chair. Some egress stairways such as those adjacent to the music department and in the front of the library have become de facto storage closets with landings and treads occupied by objects. (Photo 23)

Interior Routes

In such an enormous facility that has grown over the decades, it is not uncommon to find inaccessible or compromised interior routes. In the survey of the High School, the following conditions were identified:

- Changes in level greater than 1:20 are present in the hallways leading to the cafeteria and in the music department area;
- Access between classrooms, lab prep rooms and shops is often obstructed by furniture or less than 32-inch clear width. (Photo 24)

Dining Surfaces

While surveying occurred during vacation when furniture is moved, the cafeteria appeared to lack dining surfaces with adequate knee and toe clearances.

Signage

While some signs have been updated in certain areas of the school, signage is missing or the remaining older signage is problematic for the following reasons:

- Exterior accessible route signage is limited;
- Accessible entrances have worn or are missing ISA symbol;
- Not all permanent rooms and spaces are properly identified with ADA-compliant signs.
- Toilet rooms are not identified accurately as Accessible or inaccessible restrooms lack signage directing to accessible restrooms; Inaccessible drinking fountains lack signage directing to accessible drinking fountains.



Photo 25



Photo 26



Photo 27

Priority 3 – Toilet Rooms

Toilet Rooms

Students are allowed to use toilet rooms in the basement of building B (near Cafeteria) and at the Gym. Elements of the student toilet rooms are the most accessible however their locations are significantly problematic. Toilet rooms for staff are provided on all floors in all buildings. Toilet rooms for public use are located near the main office and at the gym.

Toilet rooms located in career oriented shops within building F are completely inaccessible. (Photo 28)

IHCD finds that there is an overarching problem of accessing student toilet rooms where it requires travel in excess of 200 feet and the use of either stairs or an elevator. This is certainly the case in Somerville High School. Additionally, student toilet rooms have a number of specific issues.

Student use toilet rooms adjacent to the cafeteria have the following issues: (Photo 25)

- grab bars are mounted below 33 inches;
- toilet is less than 17 inches from sidewall.

Staff toilet rooms in buildings A, B, C, D generally have two or three stalls, one of which may be accessible. Accessing these toilet rooms can be problematic for the following reasons:

Most restrooms in buildings A, B, C, & D
have doors in a series where the outer door
was removed long ago but the door frame
was not. This results in constricted
maneuvering clearance on the latch pull
side;



Photo 28



Photo 29



Photo 30

- Semi-recessed metal floor plates were found within many of the accessible toilet stalls. These plates are often angled toward the adjacent sidewall and radiator thus making the floor alongside the toilet uneven;
- One or more grab bars is incorrectly mounted or does not meet dimensional requirements; (Photo 26)
- Stall dispensers are mounted incorrectly;
- Latches are broken or require tight pinching, grasping or twisting;
- Coat hooks are missing or are mounted incorrectly;
- Lavatories lack sufficient knee clearance, wrapped pipes, and/or accessible faucets; (Photo 27)
- Soap and paper towel dispensers are mounted incorrectly or lack clear space in front of them; (Photo 27)
- Mirrors are missing or are mounted incorrectly.

Locker Rooms

Locker rooms are provided in several shops in addition to the gym. The locker rooms located in career oriented shops within building F are completely inaccessible. The gymnasium locker rooms have the following issues: (Photos 29 and 30)

- Lack accessible changing stalls;
- Lack accessible shower benches:
- Lack compliant grab bars;
- Lack accessible lockers.

Toilet Room Signage

Although a few signs have been installed in certain toilet rooms, none of the toilet rooms in the building have accessible signage.

Furthermore, most inaccessible toilet rooms are incorrectly identified with the International Symbol of Accessibility.



Photo 31



Photo 32



Photo 33

Priority 4 – Additional Access

Drinking Fountains

Drinking fountains are provided in most buildings and on most floors. Most were inaccessible because they lacked sufficient clearance and/or had inaccessible controls that required twisting. Others such as the one pictured are accessible but the controls are inaccessible. (Photo 31)

Lockers

There are thousands of lockers in the high school but school staff indicated none were accessible. (Photo 32)

Pay Phones

Both public pay phones lack signage indicating availability of TDD/TTY, nor was a TDD/TTY found. (Photo 33)

Recommendations

Priority 1 - Approach & Entrance

Parking & Drop-off Area (cost estimate – up to \$25,000)

 Establish a plan to provide at least six or seven accessible spaces apart from those serving City Hall and the Central Library. This plan should assume the need to regrade, resurface, and re-stripe existing accessible spaces. Assuming seven spaces, two should be designated van accessible with the adjacent 96-inch wide access aisle. Ensure that each Accessible and Van Accessible space is identified sign mounted at 96 inches above the ground.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and General Site and Building Elements for Accessible Parking.

Sidewalks and Curb Ramps (cost estimate – in excess of \$25,000)

- 1. Repair or replace broken or heaved sidewalk panels.
- 2. Remove and re-grade ramp in front of building D and install railings.
- 3. Re-grade walkway to Day-Care and rear entrance of Health Center.
- 4. Replace curb ramps at accessible entrance, gym entrance and at all accessible parking.
- 5. Install curb ramps at main entrance drop off and at sidewalk leading to flag pole.
- 6. Table or otherwise re-grade driveway aprons and replace curb ramps along Highland Avenue.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Ramps.

Entrances

- Train staff to answer accessible entrance intercom and install video surveillance.
 Develop policies and procedures to ensure accessible entry during non-school hours.
 Immediate Priority (cost estimate up to \$1,000)
- Demolish and reconstruct accessible entrance ramp and entry. Remove walls to improve visibility, safety and security, provide a video camera, accessible intercom and automatic door opener. (cost estimate – up to \$25,000)

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Ramps.

Priority 2 – Access to Goods & Services Specific Academic and Extra-Curricular Spaces

Short Term: (cost estimate – up to \$1,000)

- Develop policies and procedures to ensure students can access and participate in all programs, services and activities held in or utilizing Specific academic and extracurricular spaces.
- Remove barriers to safety equipment including kill switches, fire blankets, emergency showers and eye wash stations.

Long Term:

(cost estimate – in excess of \$25,000)

- Provide an accessible version of each type of science and shop workstation. It should be integrated with other stations and near white/black boards, screens, and demonstration / instruction area.
- 4. Ensure access to and around accessible teaching stations and lab preparation areas.
- 5. When language lab is replaced, ensure that raised control station has an accessible route to it.
- 6. Provide an accessible route to outdoor classroom and TV.

Lifts

Short Term (cost estimate – up to \$5,000)

- 1. Make independently operable.
- 2. Schedule yearly maintenance and inspections.

Long Term

(cost estimate – in excess of \$25,000)

 Establish an internal accessible route between the auditorium, stage, backstage and below stage.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Platform Lifts.

Doors & Gates

(cost estimate – in excess of \$25,000)

- Create a comprehensive maintenance program and schedule to check and adjust the opening force of all exterior and interior doors. Where not possible, either keep doors open during regular hours or add automatic openers.
- 2. Install power door opener on interior vestibule door at health center.
- 3. Prioritize the removal or replacement of high thresholds.
- 4. Replace all door knobs with lever hardware.
- 5. Remove all door partitions at the entry of most toilet rooms and locker rooms.
- If the building is to be retained and eventually renovated, provide an automatic opener wherever doors do not have the required maneuvering clearance on their latch side. Prioritize entry doors and doors to toilet rooms.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Doors, Doorways, and Gates.

Accessible Seating (cost estimate – up to \$25,000)

 As auditorium is renovated, provide dispersed accessible seating as well as seating with flip-up armrests.

For additional information, please see Part E – ADA/MAAB References – Special Rooms, Spaces and Elements for Wheelchair Spaces, Companion Seats, and Designated Aisle Seats.

Floor Surfaces

(cost estimate – up to \$10,000)

- Replace removable floor panels and remove tripping hazards, especially at the basement level and in accessible toilet stalls.
- Secure all weather mats with industrialstrength double-stick tape. Alternatively, replace them with recessed walk-off mats or grates.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Floor Surfaces.

Protruding Objects (cost estimate – up to \$1,000)

1. Install cane-detectable barriers below wall-mounted light fixtures, hand sanitizers, and old-fashioned drinking fountains. Cane-detectable barriers could be mounting hardware for trash containers, fixed panels, furniture, or other permanent barriers.

For additional information, please see Part E – ADA/MAAB References – Building Blocks for Protruding Objects.

Sales and Service Counters (cost estimate – up to \$5,000)

Short Term

1. Provide a table or other writing surface at inaccessible counters.

Long Term

 Prioritize the installation of accessible counters at high traffic areas such as the Main Office.

For additional information, please see Part E – ADA/MAAB References – Built-In Elements for Sales and Service Counters.

Stairways (cost estimate – up to \$1,000)

- Develop policies and procedures to evacuate individuals unable to navigate stairs.
- 2. Remove stored items and articles from all stair treads and landings.

For additional information, please see Part E – ADA/MAAB References – Scoping for Emergency Egress and General Site and Building Elements for Stairways.

Interior Routes and Circulation Paths (cost estimate – up to \$1,000)

 Remove stored items and articles from all classroom to classroom, shop, lab, and lab prep room doorways to ensure a 32-inch minimum clear width.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Accessible Routes.

Signage

(cost estimate – in excess of \$25,000)

 Implement a comprehensive signage plan to ensure that accessible signage is provided at all required locations.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 3 - Toilet Rooms

Short Term

(cost estimate – in excess of \$25,000 each)

- Install accessible signage at all toilet rooms.
 Where the toilet room is inaccessible, install signage directing one to the closest accessible toilet room.
- Either modify or renovate existing multi-user toilet rooms or construct one single-use accessible toilet room on each floor of buildings A, B, D, & F. Begin with one or two on each of the upper floors.

Long Term (cost estimate – up to \$25,000 each)

- Renovate locker rooms.
- 2. Ensure that all locker rooms and toilet rooms have visual alarms.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Toilet and Bathing Rooms.

Priority 4 – Additional Access

Drinking Fountains

Short Term (cost estimate – up to \$25,000)

- 1. Install accessible signage directing one to the closest accessible drinking fountain;
- 2. Install one accessible drinking fountain per floor per building.

Long Term

(cost estimate – in excess of \$25,000)

 Budget for the replacement of all drinking fountains with high efficiency accessible hilo models.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Drinking Fountains

Kitchenettes

Short Term (cost estimate – up to \$1,000)

1. Ensure policies are developed to address employee accommodation requests.

Long Term

(cost estimate – in excess of \$25,000)

 As kitchenettes are replaced, ensure that replacements meet all ADA/MAAB requirements.

For additional information, please see Part E – ADA/MAAB References – Special Rooms, Spaces and Elements for Kitchens and Kitchenettes.

Pay Phones (cost estimate – up to \$1,000)

- 1. If no TTY is provided, acquire and install one.
- 2. At pay phones, install accessible signage directing to the TTY. Note that the TTY must be accessible and available whenever the payphone is operable.

For additional information, please see Part E – ADA/MAAB References – Communication Elements and Features for Telephones.

Safety & Usability Recommendations

Elevators (cost estimate – up to \$5,000)

- 1. Schedule yearly maintenance and inspections.
- 2. Budget for future modernization and overhaul.
- Provide and verify backup power source for elevators to address F.N.S.S. emergency shelter needs.

Toilet Rooms (cost estimate – up to \$25,000)

1. Provide accessible shower / locker rooms to address F.N.S.S. emergency shelter needs.

Stairways (cost estimate – up to \$10,000)

- 1. Acquire Evacuation Chairs.
- Engage NFPA (Allan Fraser) to assist with staff training and locating of evacuation chairs.





Kennedy School

S7 - Kennedy School

Building Description

Located at 5 Cherry Street the Kennedy School is a complex consisting of 3- to 4-story buildings joined together. One building houses a pool that is open to the public. The other building contains classrooms, a cafetorium, and gym. The buildings were constructed primarily with brick and concrete masonry units at various times, most recently in the late 1990s. The school is designed for kindergarten through Grade 8 and provides activities until 5:30 p.m. although the pool is open most evenings and weekends. The school also abuts athletic courts and a playground.

Located on a hilly site, the building's main entrance and staff only entrances are at grade, essentially the same as adjacent sidewalks. Intercoms and security systems are present. However the pool's after hours entrance is not accessible because it lacks an elevator.

Though the school is a designated emergency shelter for Somerville, MEMA, and FEMA use, the school lacks accessible showers for shelter use beyond 48 hours and may require backup power for refrigeration and elevator usage.

No accessible drop-off is provided but a number of public off-street public parking spaces are provided at this facility. The main entrance lot has 44 spaces and approximately 29 spaces along and off of Sartwell Avenue. 2 accessible

spaces are provided at the main entrance and 1 accessible space off of Sartwell Avenue.
As one would expect for a newer school, an elevator and multiple egress stairways offer vertical circulation to all floor levels. Likewise, giving the diverse ages served, single user toilet rooms are found in some classrooms. Toilet rooms for staff are provided on all floors. Toilet rooms for public use are located at the main office, the pool and at the cafetorium.

Services to students and or the public are offered on all floor levels. Aside from the typical issues of doors that exceed the maximum allowable opening force, unsecured carpets, there are some issues impacting overall accessibility.

Structural Accessibility

While most of the building elements were designed and built in accordance to state and federal accessibility regulations, the City has ongoing obligations for accessibility:

The City must ensure that students and the public can access the programs, services and activities at the Kennedy School.

Aside from modifying policies and procedures to ensure programmatic access, this also means:

- Elements that were not constructed in compliance with code must be corrected to current standards.
- As alterations and renovations are undertaken, elements that are not accessible must be brought into compliance with current 521CMR and 2010 ADA Standards.

 Building elements that are inaccessible as a result of new standards adopted since they were built, need to be brought into compliance if they are a barrier to equal participation in programs, services and activities offered.

Building Summary and Recommendations

Unlike newer school buildings within Somerville, the Kennedy School has several significant accessibility concerns that impact student and public access. The following significant issues were identified as barriers:

- The accessible route to the pool during nonschool hours is significantly compromised because elevator access is provided at the main school entrance. This entrance is unlocked only when the main office is staffed. The pool entrance and website provide no information about how to access the pool when only the inaccessible pool entrance is open;
- Exterior access is problematic because of missing or non-compliant curb ramps and sidewalks;
- 3. Exterior accessible routes are not identified;
- 4. Locker room elements including showers are non-compliant;
- 5. The pool's stadium style seating does not provide accessible seating;
- 6. No accessible route is provided to the cafetorium stage;
- 7. The ramp on the third floor has landings that are non-compliant;
- Maintenance of accessible features including dispensers, accessible stall locks and toilets is needed;
- Accessible routes to athletic facilities and playgrounds are not identified and gates are inaccessible;

- Accessible workstations are not provided in specialized areas such as computer labs;
- Low-hanging classroom TVs are protruding objects;
- Routes between classrooms are compromised by storage, furniture, unsecured carpets and protruding objects;
- 13. Single user accessible toilet rooms are frequently used for storage;
- Evacuation chairs and Areas of Refuge/Rescue Assistance are not provided;
- Where provided, accessible designating signage is missing or lacks Braille and or raised characters;
- 16. The school lacks may require backup power for refrigeration and elevator usage.

Alongside the development of policies and procedures to address a number of conditions, given these overall findings, the following projects should be undertaken:

Short Term

- Repair accessible dispensers, stall door hardware and toilets;
- Provide and identify accessible route to the pool for after hours / non-school hours access, implement policies and procedures to guarantee such access;
- 3. Modify locker rooms and accessible showers:
- 4. Make minor modifications to existing multiuser toilet rooms;
- Establish policies and procedures to prevent storage of materials in single user toilet rooms.

Long Term

- 1. Establish an accessible route to the cafetorium stage:
- 2. Establish accessible seating at pool bleachers:
- 3. Re-grade, resurface and re-stripe accessible parking;

Safety and Usability Recommendations

- Schedule yearly elevator and lift maintenance and inspections;
- 2. Plan for eventual overhaul and modernization of elevators:
- Provide and verify backup power source for elevator to address F.N.S.S. emergency shelter needs;
- 4. Acquire evacuation chairs and locate in at front and rear second floor stairwells.
- 5. Consider installing one or more accessible showers to meet emergency shelter needs;
- Consider providing backup power for refrigeration to meet emergency shelter needs.



Photo 1



Photo 2



Photo 3

Issues

Priority 1 – Approach & Entrance

Parking & Drop-off Area

There are limited off-street staff and public parking spaces adjacent to the building. The following issues were identified:

- Running and cross slopes slightly exceed
 1:48 in any direction; (Photo 1)
- A sign for van designated space is missing at the parking lot off Sartwell Avenue.
 (Photo 2)

Sidewalks and Curb Ramps

The Kennedy School has pedestrian and vehicular entrances along Elm, Cherry and Sartwell. At each driveway, curb ramps either exceed maximum running or cross slope requirements, have vertical lips greater than 1/2 inch or lack level landings. (Photos 2 and 3)

Additionally, the sidewalk that runs the length of the school at Sartwell Avenue is missing a curb ramp. This sidewalk also connects to the gym and cafetorium entrance and eventually to the playground behind Wade Court.

Entrances

The building has one public entrance on Cherry Street as well as locked employee only entrances. Each entrance occurs at grade and has double doors. The main entrance is visible from the office; however, the intercom lacks accessible signage.



Photo 4



Photo 5



Photo 6

The pool entrance is inaccessible from Sartwell Avenue because it can only be accessed by a stairway. (Photo 4)

Signage and the City website do not identify the accessible route, especially for non-school hours access. In fact, for non-school hours the website only says the following:

To get to the pool entrance from the front entrance (5 Cherry Street, Somerville, MA 02144) of the Kennedy School, simply keep walking outside towards the basketball court, at the end of the basketball court take a right and walk up the stairs, enter the door in front of you, then walk all the way down to the Kennedy Pool.

Priority 2 – Access to Goods & Services

Specific Academic and Extra-Curricular Spaces

The following issues were identified:

- Room #300, computer, and library media lab work surfaces provided less than 27 inches of knee clearance, no accessible stations were found; (Photo 5)
- Each type of science lab lacked a permanent or moveable accessible student lab station. (Photo 6)

Additionally, the Kennedy School serves a Kindergarten to Grade 8 population and appears to have certain single user toilet rooms designed for children of different ages. Those designed for grades K-3 or 4-6 should be serving the respective grades.



Photo 7



Photo 8



Photo 9

Accessible Seating

The pool has stadium style seating but does not provide any designated accessible seating. (Photo 7)

Elevators

One elevator is provided in this school. However, the elevator inspection certificate is expired.

Doors

Throughout the building, the following door issues were identified:

- Gates to athletic facilities lack smooth surfaces and accessible hardware;
- A few doors have reduced maneuvering clearance on the latch pull side or cannot open a full 90 degrees because of furniture or stored items; (Photo 8)
- Many single- and double-leaf doors exceed the maximum allowable force required to open them.

Floor Surfaces

The Kennedy School has the following conditions floor surface issues:

- Unsecured weather mats at entrance doors and other locations;
- Unsecured carpets in classrooms.

Protruding Objects

Throughout the circulation path in the building, hazardous protruding objects can increase the possibility of injury to visitors and staff. Few major objects were identified however staff should be aware that protruding objects generally include, but are not limited to, the following:



Photo 10



Photo 11



Photo 12

- Hanging TVs and network/data boxes;
- Automatic external defibrillators; (Photo 9)
- Fire extinguishers.

Stairways

The 4-5 steps to the stage lack handrails on both sides. (Photo 10)

Multiple egress stairways offer vertical circulation to all floor levels. However no stairwell is designated as an Area of Refuge nor equipped with an evacuation chair.

Interior Routes

In schools, it is not uncommon to find inaccessible or compromised interior routes. In the survey of the Kennedy School, the following conditions were identified:

- There appears to be no accessible route to the stage in the cafetorium; (Photo 10)
- The interior ramp has a landing depth of less than 55 inches because of the wall mounted radiator; (Photo 11)
- Access between classrooms or offices is sometimes obstructed by furniture. (Photo 12)

Signage

Virtually all permanent rooms and spaces have designating signage however there are some issues:

- Some permanent rooms were missing signage; (Photo 13)
- Classroom designation signage is covered by artwork;
- Accessible entrances have worn or are missing ISA symbol.



Photo 13



Photo 14



Photo 15

Priority 3 – Toilet Rooms

Toilet Rooms

Toilet rooms for students are found in many classrooms and some are designed for their target age population. Toilet rooms for staff are provided on all floors in all buildings. Toilet rooms for public use are located at the main office and at the cafetorium. Looked at in entirety, the Kennedy's toilet rooms are in good good shape but a number of specific issues were identified:

Student use toilet rooms have the following issues:

- A few toilets may be higher than 19 inches or lower than 17 inches above the floor;
- Some toilets may be further than 18 inches on center from the side wall;
- Height of toilet and grab bars may not match target age group the toilet room was designed for or used by;
- Accessible features including dispensers, accessible stall locks and toilets were broken or missing in multi-user toilet rooms. Until these hardware elements are replaced or fixed, provide accessible signage identifying the toilet rooms as inaccessible and directions to accessible toilet rooms;
- Trash receptacles may intrude on clear floor space of lavatories. (Photo 14)

Multi-user toilet rooms generally are accessible apart from the following issues identified:

 Accessible features including dispensers, accessible stall locks and toilets were broken or missing in multi-user toilet rooms. Until these hardware elements are replaced or fixed, provide accessible signage identifying the toilet rooms as inaccessible and directions to accessible toilet rooms; (Photo 15 and 16)



Photo 16



Photo 17



Photo 18

- Some accessible stalls have inaccessible sliding locks (example near room #327)
- A few toilets may be higher than 19 inches or lower than 17 inches above the floor;
- Some toilets may be further than 18 inches on center from side wall;
- Lavatories had exposed pipes; (Photo 17)
- While not required by ADA/AAB requirements: Urinal guards are missing (see male toilet room near room #320 for example). (Photo 18)

Staff toilet rooms generally are single user and accessible. The following issues were identified:

- Stall dispensers are mounted incorrectly;
- Coat hooks are missing or are mounted incorrectly;
- Trash receptacles may intrude on clear floor
- Mirrors are missing or are mounted incorrectly.

Locker and Shower Rooms

The pool has both male and female locker and shower rooms. The following issues were identified:

- Accessible shower stalls either are missing a wall mounted bench or have a bench that does not meet dimensional requirements for either MAAB or ADAAG; (Photo 19 and 20)
- Hand held spray hose is less than 60 inches long;
- No accessible lockers are provided;
- Fixed bench seats do not meet dimensional requirements;
- Baby changing stations, if provided, are not on accessible routes and lack clear floor space.



Photo 19



Photo 20



Photo 21

Priority 4 - Additional Access

Classroom Sinks

Most classrooms have counter inset sinks, designed for side approach but some have permanent soap and paper towel dispensers (where provided) are located beyond reach ranges.

Drinking Fountains

Hi-lo drinking fountains are not maintained. Older inset wall models are too high to be accessible and signage is not provided to direct users to the functioning accessible drinking fountains. (Photo 21)

Recommendations

Priority 1 – Approach & Entrance

Sidewalks and Curb Ramps (cost estimate – up to \$10,000)

- 1. Remove lips on curb ramps;
- 2. Reconstruct curb ramps with excessive slopes or lacking level landings.
- 3. Install missing curb ramp along Sartwell Avenue.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Ramps.

Parking & Drop-off Area (cost estimate – up to \$1,000)

Short Term

 Provide van designation signage at Sartwell Avenue parking space.

Long Term

 Assume the need to re-grade, resurface, and re-stripe existing accessible spaces.
 Ensure that each Accessible and Van Accessible space is identified sign mounted between 60 to 96 inches above the ground.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and General Site and Building Elements for Accessible Parking.

Entrances (cost estimate – up to \$1,000)

Immediate Priority

1. Provide accessible signage at intercom.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 2 – Access to Goods & Services

Specific Academic and Extra-Curricular Spaces (cost estimate – up to \$10,000)

Short Term

 Develop policies and procedures to ensure students can access and participate in all programs, services and activities held in or utilizing specific academic and extracurricular spaces.

Long Term

 Provide a fixed accessible version of each type of workstation. It should be integrated with other stations and near white/black boards, screens, and demonstration / instruction area.

For additional information, please see Part E – ADA/MAAB References.

Evaluation of Facilities – Kennedy School

Accessible Seating (cost estimate – up to \$25,000)

 Develop designs and estimate cost for establishing accessible seating at pool bleachers.

For additional information, please see Part E – ADA/MAAB References – Special Rooms, Spaces and Elements for Wheelchair Spaces, Companion Seats, and Designated Aisle Seats.

Doors & Gates (cost estimate – up to \$5,000)

- Install accessible gate surfaces and hardware on gates to athletic facilities and playgrounds.
- Create a comprehensive maintenance program and schedule to check and adjust the opening force of all exterior and interior doors. Where not possible, keep doors open during regular hours.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Doors, Doorways, and Gates.

Floor Surfaces (cost estimate – up to \$1,000)

- Secure all weather mats with industrialstrength double-stick tape. Alternatively, replace them with recessed walk-off mats or grates.
- 2. Secure all carpets in classrooms and other spaces.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Floor Surfaces.

Protruding Objects (cost estimate – up to \$1,000)

 Relocate objects or where not possible, install cane-detectable barriers below wallmounted light fixtures, hand sanitizers, TVs, etc. Cane-detectable barriers could be mounting hardware for trash cans, fixed panels, furniture, or other permanent barriers.

For additional information, please see Part E – ADA/MAAB References – Building Blocks for Protruding Objects.

Stairways (cost estimate – up to \$5,000)

- Develop policies and procedures to evacuate individuals unable to navigate stairs.
- 2. Install railings on both sides of stairs to stage.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Stairways.

Interior Routes and Circulation Paths

- 1. Establish an accessible route to the cafetorium stage.
- 2. Relocate wall mounted radiator at ramp landing.
- Remove stored items and articles from all classroom to classroom paths to ensure a 32-inch minimum clear width.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes or Accessible Routes.

Signage (cost estimate – up to \$1,000)

- 1. Provide Braille and raised characters on all permanent designation signage.
- 2. Ensure designation signage is not blocked by artwork.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 3 – Toilet Rooms (cost estimate – up to \$1,000)

- 1. Maintain accessible features including dispensers, accessible stall locks and toilets.
- 2. Make minor modifications to adult toilet rooms.
- 3. Develop policies and procedures to ensure toilet rooms are not used for storage.
- Ensure that there are an adequate number of toilet rooms for each age group served.
 Note that there are specific ADA and MAAB toilet and sink requirements for K-3, and 4-6.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Toilet and Bathing Rooms.

Priority 4 - Additional Access

Classroom Sinks (cost estimate – up to \$1,000)

1. Institute procedures to provide hand soap and paper towels on the sink counter.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Lavatories and Sinks.

Drinking Fountains (cost estimate – up to \$5,000)

- 1. Repair accessible drinking fountains;
- 2. Provide signage at inaccessible drinking fountains that directs to accessible models.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Drinking Fountains.

Safety & Usability Recommendations

Elevators (cost estimate – up to \$5,000)

- 1. Schedule yearly maintenance and inspections;
- Provide and verify backup power source for elevator to address F.N.S.S. emergency shelter needs.

Stairways (cost estimate – up to \$10,000)

- 1. Acquire Evacuation Chairs that go both Up and down stairways.
- Engage NFPA (Allan Fraser) to assist with staff training and locating of evacuation chairs.





Winter Hill School

S8 - Winter Hill

Building Description

Located at the intersection of Medford and Sycamore Streets, the Winter Hill School is a three-story, concrete structure with no off-street staff and public parking spaces provided.

The building has entrances on Medford and Sycamore Streets. While these entrances are accessible and an elevator provides vertical circulation to all floor levels, the building has not seen substantial renovation since its construction in the 1960-70's.

Toilet rooms for staff and public use are located on each floor but none are accessible.

Exterior playgrounds and courts abut the school and are accessed via walkways, stairs and ramps.

Structural Accessibility

While the Winter Hill School appears to have been designed and built prior to state and federal accessibility regulations and has undergone some accessibility upgrades, the City has ongoing obligations for accessibility:

The City must ensure that the public can access the programs, services and activities at the Winter Hill School.

Aside from modifying policies and procedures to ensure programmatic access, this also means:

- Elements that were not constructed in compliance with code must be corrected to current standards.
- As alterations and renovations are undertaken, elements that are not accessible must be brought into compliance with current 521CMR and 2010 ADA Standards.
- Building elements that are inaccessible as a result of new standards adopted since they were built, need to be brought into compliance if they are a barrier to equal participation in programs, services and activities offered.

Building Summary and Recommendations

Similar to other buildings within Somerville, the Winter Hill School has many typical accessibility concerns, e.g.: non-compliant sidewalks, ramps, doors, stairways, toilet rooms, counters, protruding objects, and signage. The following issues are most problematic:

- Exterior access is problematic because of broken or non-compliant curb ramps and sidewalks.
- 2. Stairs have existing handrails that are non-compliant;

- 3. Exterior ramps have thresholds, broken handrails, and slightly excessive slopes;
- 4. Toilet rooms and locker rooms are not accessible;
- 5. Doors have numerous non-compliant conditions;
- Where provided, designating signage is frequently installed in incorrect locations and lacks raised characters, Braille and other required accessibility features.
- Evacuation plans were not shared and evacuation chairs and Areas of Refuge/Rescue Assistance are not provided.

Alongside the development of policies and procedures to address a number of the above conditions, given these overall findings, the following distinct projects should be undertaken promptly, likely utilizing outside professionals:

- Either modify or renovate existing multi-user toilet rooms or construct one single-use accessible toilet room on each floor of building. Install signage to direct users to the accessible toilet room.
- 2. Replace curb ramps and sidewalk surfaces;

Safety and Usability Recommendations

- 1. Schedule yearly elevator maintenance and inspections;
- Plan for eventual overhaul and modernization of elevators;
- Provide and verify backup power source for elevator to address F.N.S.S. emergency shelter needs;
- 4. Acquire evacuation chairs and locate in at front and rear second floor stairwells.
- 5. Consider installing one or more accessible showers to meet emergency shelter needs;
- Consider providing backup power for elevator and refrigeration to meet emergency shelter needs.



Photo 1



Photo 2



Photo 3

Issues

Priority 1 – Approach & Entrance

Parking & Drop-off Area

No off-street public parking is offered in this facility. On street parking and drop-off is offered. (Photo 1)

Sidewalks and Curb Ramps

The entrances to the school are directly connected to the sidewalks along Medford, Sycamore, and Evergreen. The sidewalks and curb ramps are in poor condition. a deteriorated and excessively sloped section of the sidewalk can be found along the vehicular curb on Kidder Avenue. (Photos 2 and 3)

Each of the curb ramps has one or more of the following problematic issues:

- vertical displacements at the bottom or top of curb ramp exceed maximum requirements;
- running slopes exceed 1:12;
- cross slopes exceed 1:48;
- level landings are not provided or where provided, exceed 1:48 in any direction;
- · pavement surfaces are degraded.

Entrances

The building has a main entrance on Medford Street. A buzzer and intercom are placed at the entry door but accessible signage is not provided. (Photo 4)



Photo 4



Photo 5



Photo 6

Priority 2 – Access to Goods & Services

Doors

Throughout the building, the following door issues were identified:

- many doors lack maneuvering clearance on the latch pull side; (Photo 5)
- certain spaces have doors that do not provide the minimum 32-inch clear width for accessible doors;
- dozens of single- and double-leaf doors exceed the maximum allowable force required to open them;
- some doors have non-compliant hardware.
 (Photo 6)

Elevators

One elevator is provided in this school and meets most requirements. However, it likely require some degree of modernization to meet current elevator safety code.

Floor Surfaces

At circulation areas as well as certain offices, several weather mats are not secure and can become tripping hazards to faculty and students. (Photo 7)

Similar to weather mats, grates with large openings can also become tripping hazards to customers and staff. (Photo 8)

Protruding Objects

In corridors, wall-mounted external automatic defibrillators become protruding objects, which increases the likelihood of injuries among people with low or no vision or others who may be unobservant. (Photo 9)



Photo 7



Photo 8



Photo 9

Ramp

Exterior ramps connect different play areas and courts however some portions of these ramps exceed the maximum allowable running slope, have vertical lips in excess of 1/2 inch, and are missing a section of handrail. (Photo 9)

Stairways

Interior and exterior steps are missing handrails or have handrails that do not meet dimensional requirements.

Dining and Work Surfaces

- The cafeteria appeared to lack any accessible dining surface with sufficient knee and toe clearance; (Photo 10)
- The Computer lab and other specific work areas appeared to lack any accessible work surface with sufficient knee and toe clearance. (Photo 11)

Signage

While some signs have been updated in certain areas of the school, signage is missing or the remaining older signage is problematic for the following reasons:

- Exterior accessible route signage is limited;
- Accessible entrances have worn or are missing ISA symbol;
- Not all permanent rooms and spaces are properly identified with ADA-compliant signs. (Photo 12)
- Toilet rooms are not identified accurately as Accessible or inaccessible restrooms lack signage directing to accessible restrooms;
- Inaccessible drinking fountains lack signage directing to accessible drinking fountains.



Photo 10



Photo 11



Photo 12



Photo 13



Photo 14



Photo 15

Priority 3 – Toilet Rooms

Toilet Rooms

Multi-user toilet rooms for are located on each floor level. At some point, a few were toilet rooms or stalls were altered with a few grab bars however none are accessible or minimally compliant. Accessing these toilet rooms can be problematic for the following reasons:

- Doors and doorways that are inaccessible because of dimensions, clear space, hardware, etc.; (Photo 13)
- Toilet is too far from sidewall;
- Toilet has wrap-around grab bars;
- One or more wall grab bars is incorrectly mounted or does not meet dimensional requirements; (Photo 14)
- Stall dispensers are mounted incorrectly;
- Latches are broken or require tight pinching, grasping or twisting;
- Coat hooks are missing or are mounted incorrectly;
- Lavatories lack sufficient knee clearance, wrapped pipes, and/or accessible faucets; (Photo 15)
- Soap and paper towel dispensers are mounted incorrectly or lack clear space in front of them;
- Mirrors are missing or are mounted incorrectly.

In summary, there are no accessible toilet rooms in the school.

Signage

Although an ISA sign has been installed on some toilet rooms, none should be labeled as accessible and similar to other permanent spaces, all toilet rooms lack accessible signage.



Photo 16

Priority 4 - Additional Access

Drinking Fountains

Drinking fountains are provided on most floor levels. All are inaccessible because they lacked sufficient clearance and or had inaccessible controls that required twisting.



Photo 17



Photo 18

Recommendations

Priority 1 – Approach & Entrance

Parking & Drop-off Area (cost estimate – up to \$10,000)

1. Construct a compliant curb ramp at the drop-off area.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Accessible Routes.

Sidewalks and Curb Ramps (cost estimate – in excess of \$25,000)

1. Reconstruct sidewalks and curb ramps surrounding Winter Hill School.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Accessible Routes.

Entrances (cost estimate – up to \$1,000)

- Identify main accessible entrance with ISA symbol.
- 2. Provide accessible signage at intercom.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 2 – Access to Goods & Services

Doors (cost estimate – up to \$5,000)

- When doors do not have the minimum clear width for accessible doors, either keep them open during regular hours or replace them with wider doors.
- 2. Replace door knobs with lever hardware.
- Create a comprehensive maintenance program and schedule to check and adjust the opening force of all exterior and interior doors. Where not possible, either keep heavy doors open during regular hours or add automatic openers.
- Provide an automatic opener wherever doors do not have the required maneuvering clearance on their latch side. Prioritize entry doors and doors to toilet rooms.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Doors, Doorways, and Gates.

Floor Surfaces (cost estimate – up to \$1,000)

- Secure all weather mats with industrialstrength double-stick tape. Alternatively, replace them with recessed walk-off mats or grates.
- 2. Replace grates with opening no wider than 1/2-inch.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Floor Surfaces.

Protruding Objects (cost estimate – up to \$1,000)

 Install a cane-detectable barrier to protect the automatic external defibrillator and any other protruding objects. Cane-detectable barriers could be trash cans, fixed panels, furniture, or other permanent barriers.

For additional information, please see Part E – ADA/MAAB References – Building Blocks for Protruding Objects.

Ramps (cost estimate – up to \$10,000)

1. Repair exterior ramps and railings.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Ramps.

Stairways

(cost estimate – in excess of \$25,000)

- 1. Install compliant handrails on both sides of the egress stairways on all floor levels.
- 2. Develop policies and procedures to evacuate individuals unable to navigate stairs.

For additional information, please see Part E – ADA/MAAB References – Scoping for Emergency Egress and General Site and Building Elements for Stairways.

Dining and Work Surfaces (cost estimate – up to \$10,000)

1. Provide accessible dining and work surfaces.

For additional information, please see Part E – ADA/MAAB References – Dining and Work Surfaces.

Sales and Service Counters (cost estimate – up to \$5,000)

Short Term

1. Provide a table or other writing surface at inaccessible counters.

Long Term

 Prioritize the installation of accessible counters at high traffic areas such as the Main Office.

For additional information, please see Part E – ADA/MAAB References – Built-In Elements for Sales and Service Counters.

Signage

(cost estimate - in excess of \$25,000)

 Implement a comprehensive signage plan to ensure that ADA-compliant signs are installed alongside all doors to identify permanent rooms and spaces.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 3 - Toilet Rooms

Toilet Rooms

(cost estimate - in excess of \$25,000)

 Either modify or renovate existing multi-user toilet rooms or construct one single-use accessible toilet room on each floor of building.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Toilet and Bathing Rooms.

Signage (cost estimate – up to \$5,000)

Install accessible signage at all toilet rooms.
 Where toilet rooms are inaccessible,
 signage should direct faculty and students
 to the closest accessible toilet room in the
 facility.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 4 - Additional Access

Drinking Fountain (cost estimate – up to \$1,000)

 Either provide an accessible drinking fountain near the accessible toilet room on the basement level or provide an adjacent water cooler with cups for equivalent access at the inaccessible drinking fountain.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Drinking Fountains.

Safety & Usability Recommendations

Elevators (cost estimate – up to \$5,000)

- 1. Schedule yearly maintenance and inspections.
- 2. Budget for future modernization and overhaul.
- 3. Provide and verify backup power source for elevators to address F.N.S.S. emergency shelter needs.

Toilet Rooms (cost estimate – up to \$25,000)

1. Provide accessible shower / locker rooms to address F.N.S.S. emergency shelter needs.

Stairways (cost estimate – up to \$10,000)

- 1. Acquire Evacuation Chairs.
- Engage NFPA (Allan Fraser) to assist with staff training and locating of evacuation chairs.





West Somerville Neighborhood School

S9 – West Somerville Neighborhood School

Building Description

Located at 177 Powder House Boulevard, the West Somerville Neighborhood School is a three-story brick structure with two parking lots off Raymond Avenue. The school also abuts athletic courts and a playground. The school is designed for kindergarten through Grade 8 and numerous after-school activities are also offered. The building's main entrance and staffonly entrances are at grade, essentially the same as adjacent sidewalks. Intercoms and security systems are present.

Though the school is a designated emergency shelter for Somerville, MEMA, and FEMA use, the school lacks accessible showers for shelter use beyond 48 hours and may require backup power for refrigeration and elevator usage.

Two accessible parking spaces for public and staff use are provided on Raymond Avenue near the accessible entrance on the second floor; however, a sign to identify one of them as a van designated parking space is not provided.

As one would expect for a newer school, an elevator and multiple egress stairways offer vertical circulation to all floor levels. Accessible toilet rooms for staff and student use are provided on all floor levels. Aside from minor issues impacting overall accessibility, sinks inside the science lab and art classroom are not accessible and the lift that leads to the stage inside the cafetorium is obstructed by storage.

Structural Accessibility

While it was designed and built prior to state and federal accessibility regulations and has undergone some accessibility upgrades, the City has ongoing obligations for accessibility:

The City must ensure that the public can access the programs, services and activities at the West Somerville Neighborhood School.

Aside from modifying policies and procedures to ensure programmatic access, this also means:

- Elements that were not constructed in compliance with code must be corrected to current standards.
- As alterations and renovations are undertaken, elements that are not accessible must be brought into compliance with current 521CMR and 2010 ADA Standards.
- Building elements that are inaccessible as a result of new standards adopted since they were built, need to be brought into compliance if they are a barrier to equal participation in programs, services and activities offered.



Photo 1



Photo 2



Photo 3

Issues

Priority 1 – Approach & Entrance

Parking & Drop-off Area

Off-street public parking is offered in the parking lot off Raymond Avenue. Two accessible parking spaces for public or staff were identified near the accessible entrance. Both signs do not meet the minimum allowable height. Additionally, one van designated parking spaced is not provided. (Photo 1)

No drop-off area was identified in this facility.

Sidewalks and Curb Ramps

The entrances to the school are directly connected to the sidewalks along Powderhouse Boulevard and Raymond Avenue. Although the sidewalks and curb ramps are in good condition, a few deteriorated areas can be found near the entrance on Powderhouse Boulevard and near the exit facing the playground. (Photos 2 and 3)



Photo 4



Photo 5



Photo 6

Priority 2 – Access to Goods & Services

Doors

Throughout the building, several single- and double-leaf doors exceed the maximum allowable force required to open them. (Photo 4)

Floor Surfaces

At most entrances and exits as well as certain circulation areas and inside the gym, several weather mats are not secure and can become tripping hazards to faculty and students. (Photo 5)

Elevator

On the first floor, a sign for floor designation is missing on the right jamb of the elevator hoistway entrance. (Photo 6)



Photo 7



Photo 8



Photo 9

Specific Academic and Extra-Curricular Spaces

Schools by nature have many specific and highly customized spaces such as biology and chemistry labs, lab preparation rooms, etc. There is an obligation for students to be able to participate in all academic and extra-curricular activities. Likewise, faculty and staff may request individual accommodations.

The science lab and art classroom on the second floor lack accessible sinks. (Photos 7 and 8)

Additionally, safety equipment such as blankets, showers, and eye wash stations inside the science lab were blocked by the adjacent sink. (Photo 8)

Lift

Although a lift is provided to the stage inside the cafetorium, it is obstructed by storage. (Photo 9)



Photo 10



Photo 11



Photo 12

Priority 3 – Toilet Rooms

Toilet Rooms

Multi-user toilet room for student use and single-user toilet rooms for faculty use are located on all floor levels. All toilet rooms are accessible, except for a few very minor issues.

In the multi-user toilet room for student use, plumbing underneath the lavatories is unprotected. (Photo 10)

In the single-user toilet rooms for faculty use, furniture obstructs the maneuvering clearance in the toilet room. (Photos 11 and 12)



Photo 13



Photo 14



Photo 15

Priority 4 - Additional Access

Drinking Fountains

Drinking fountains are provided on all floor levels. The drinking fountains inside the gym are inaccessible because they lacked sufficient clearance and or had inaccessible controls that required twisting. (Photo 13)

Lockers

On all floor levels, lockers for student storage are found along corridors. Accessible lockers were not identified in this facility. (Photos 14 and 15)

Recommendations

Priority 1 – Approach & Entrance

Parking & Drop-off Area (cost estimate – up to \$10,000)

- 1. Convert one parking space into a van designated parking space.
- 2. Ensure that each accessible and van accessible space is identified sign mounted at 96 inches above the ground.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and General Site and Building Elements for Accessible Parking.

Sidewalks and Curb Ramps (cost estimate – up to \$10,000)

 Repair or replace the sidewalk near the entrance on Powderhouse Boulevard and near the exit facing the playground.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Accessible Routes.

Priority 2 - Access to Goods & Services

Doors (cost estimate – up to \$5,000)

 Create a comprehensive maintenance program and schedule to check and adjust the opening force of all exterior and interior doors. Where not possible, either keep heavy doors open during regular hours or add automatic openers.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Doors, Doorways, and Gates.

Floor Surfaces (cost estimate – up to \$1,000)

 Secure all weather mats with industrialstrength double-stick tape. Alternatively, replace them with recessed walk-off mats or grates.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Floor Surfaces.

Elevator

 Install a sign for floor designation on the right jamb of the elevator hoistway entrance.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Elevators.

Specific Academic and Extra-Curricular Spaces

Short Term: (cost estimate – up to \$1,000)

- Develop policies and procedures to ensure students can access and participate in all programs, services and activities held in or utilizing Specific academic and extracurricular spaces.
- Remove barriers to safety equipment such as blankets, showers, and eye wash stations inside the science lab on the second floor.

Long Term: (cost estimate – in excess of \$25,000)

 Ensure that at least one of each sink in the science lab and art classroom on the second floor is accessible.

For additional information, please see Part E – ADA/MAAB References.

Priority 3 – Toilet Rooms

Toilet Rooms

(cost estimate – up to \$1,000)

- Protect the plumbing underneath the lavatories in the multi-user toilet room for student use.
- 2. Remove all furniture inside the single-user toilet rooms for faculty use.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Toilet and Bathing Rooms.

Priority 4 - Additional Access

Drinking Fountain (cost estimate – up to \$1,000)

 Either provide an accessible drinking fountain inside the gym or provide an adjacent water cooler with cups for equivalent access at the inaccessible drinking fountain.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Drinking Fountains.

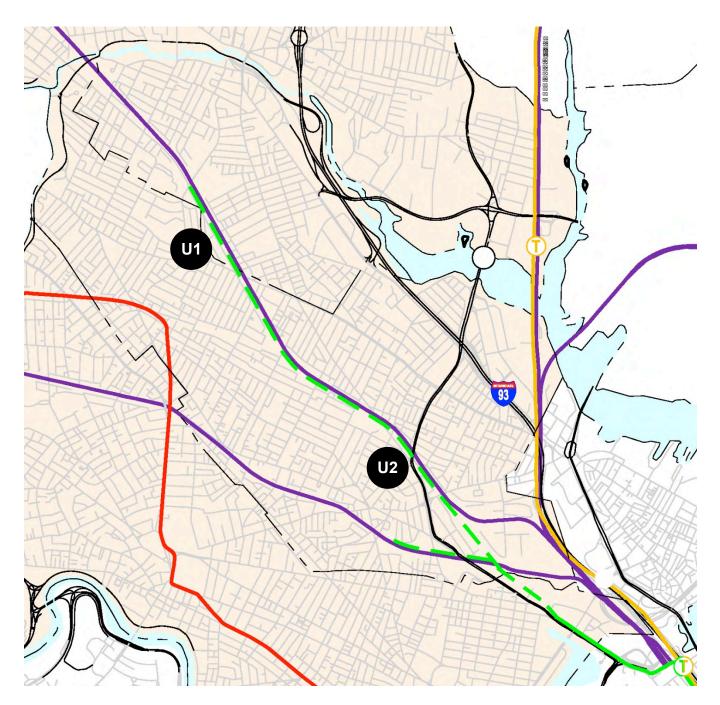
Lockers

(cost estimate - up to \$5,000)

 Provide at least 5 percent, but no fewer than one of each type of lockers, of accessible lockers on each floor level. Accessible lockers can be accomplished by refurbishing existing lockers or installing new ADA-compliant lockers.

For additional information, please see Part E – ADA/MAAB References – ADA Reference – Special Rooms, Spaces and Elements for Storage.





Unoccupied Buildings U1 – Tufts Field House

U2 - Prospect Hill Tower



Prospect Hill Tower

Unoccupied Buildings

Description

The City of Somerville owns two unoccupied buildings:

- U1 Prospect Hill Tower
- U2 Tufts Field House

The City also owns the Homans Building in Gilman Square and the Powderhouse Community School in Teele Square. Both facilities were identified for evaluation under the original contract; however, once the evaluation started, the City eliminated them because they are either not open to the public or are for sale.

While currently unoccupied, the East Somerville Community School will be open for the next academic year. As part of the original contract, IHCD will perform a 'hard hat tour' to evaluate this facility, which will be shared with the City of Somerville as an appendix to this report.

Structural Accessibility

While it was designed and built prior to state and federal accessibility regulations and has undergone some accessibility upgrades, the City has ongoing obligations for accessibility:

The City must ensure that the public can access the programs, services and activities at the unoccupied buildings.

Aside from modifying policies and procedures to ensure programmatic access, this also means:

- Elements that were not constructed in compliance with code must be corrected to current standards.
- As alterations and renovations are undertaken, elements that are not accessible must be brought into compliance with current 521CMR and 2010 ADA Standards.
- Building elements that are inaccessible as a result of new standards adopted since they were built, need to be brought into compliance if they are a barrier to equal participation in programs, services and activities offered.



Photo 1

Prospect Hill Tower

Prospect Hill Tower is a stone structure built atop Prospect Hill in 1903. (Photo 1)

Two sets of stone stairways connect the sidewalk along Monroe Street to the base of the tower, which is used as a viewing platform by the public. (Photos 2 and 3)

This facility offers no accessibility features.



Photo 2



Photo 3



Photo 1



Photo 2



Photo 3

Tufts Field House

Tufts Field House, a stone field house built during the Great Depression, is located in the Nathan Tufts / Powderhouse Park. According to the visitor's guide of the park, the Tufts Field House has served many purposes over the years, including as an office for the Draft Board, then for the Traffic and Parking Department, and most recently as a Youth Program center. The building underwent significant repairs and restoration work both inside and outside during 2001-2002, and is now available for public use by petition. (Photo 1)

This facility has two entrances facing College Avenue that are accessed via short stairways. At the rear of the building, an at-grade entrance with an automatic door offers an accessible route into the building. (Photo 2)

No signage directing visitors to the accessible entrance at the rear is provided at the inaccessible entrances.

Once inside, a large meeting room and a single-user toilet room are provided. At every interior door, thresholds that exceed the maximum allowable height create barriers to residents using wheeled mobility devices.

Although there has been an attempt to increase the accessibility in the toilet room with the installation of a few accessible features this space is not accessible. (Photo 3)

No interior signage is provided in this facility.

Recommendations

Priority 1 – Approach & Entrance

No recommendations.

Priority 2 – Access to Goods & Services

Doors (cost estimate – up to \$5,000)

- 1. Replace door knobs with lever hardware.
- Create a comprehensive maintenance program and schedule to check and adjust the opening force of all exterior and interior doors. Where not possible, either keep heavy doors open during regular hours or add automatic openers.
- 3. Provide an automatic opener at the interior door of the entry vestibule.
- Replace or remove the thresholds of the doors to the entry vestibule and the toilet room.
- 5. Reverse the swing of the door to the toilet room and install door closer.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Doors, Doorways, and Gates.

Signage (cost estimate – up to \$1,000)

 Implement a comprehensive signage plan to ensure that ADA-compliant signs are installed alongside all doors to identify permanent rooms and spaces.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 3 – Toilet Rooms

Toilet Room (cost estimate – up to \$1,000)

- Remove the side grab bar and install new compliant grab bars along the side and rear walls of the toilet. Grab bars must be mounted between 33 inches and 36 inches above the floor.
- 2. Protect the plumbing underneath the toilet.
- 3. Lower the mirror above the lavatory so that the bottom edge of the reflecting surface is 40 inches maximum above the floor.

For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Toilet and Bathing Rooms.

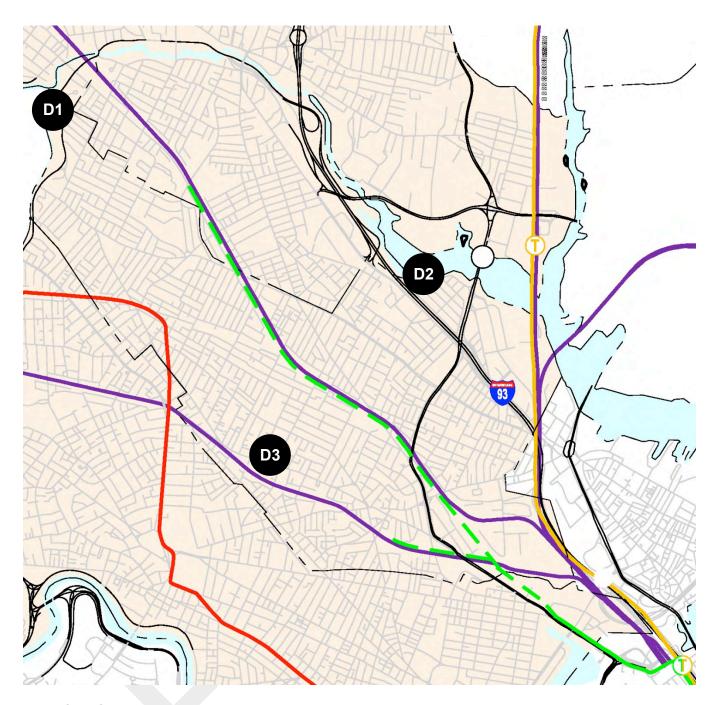
Signage (cost estimate – up to \$1,000)

1. Install accessible signage at the toilet room.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

NOTE: Due to historic significance of the Prospect Hill Tower, making improvements to increase the level of accessibility at this facility is not advisable.





DCR-Owned

D1 – Dilboy Stadium

D2 - Boat House

D3 – Veterans Memorial Rink



Boat House

DCR-Owned Facilities

Description

The City of Somerville operates three facilities currently owned by the Massachusetts Department of Conservation and Recreation:

- D1 Dilboy Stadium
- D2 Boat House
- D3 Veterans Memorial Rink

Outside Dilboy Stadium, the City also operates one swimming pool, two baseball fields also used for soccer and football, two tennis courts, basketball courts, a playground and one public parking lot along the Alewife Brook Reservation. These recreational facilities were not identified for evaluation under the original contract.

Structural Accessibility

While it was designed and built prior to state and federal accessibility regulations and has undergone some accessibility upgrades, the City has ongoing obligations for accessibility:

The City must ensure that the public can access the programs, services and activities at the DCR-owned facilities.

Aside from modifying policies and procedures to ensure programmatic access, this also means:

- Elements that were not constructed in compliance with code must be corrected to current standards.
- As alterations and renovations are undertaken, elements that are not accessible must be brought into compliance with current 521CMR and 2010 ADA Standards.
- Building elements that are inaccessible as a result of new standards adopted since they were built, need to be brought into compliance if they are a barrier to equal participation in programs, services and activities offered.



Photo 1



Photo 2



Photo 3

Dilboy Stadium

In 2006, a \$7.7 million renovation of Dilboy Stadium transformed this DCR-owned facility into a much improved recreational facility. Football, soccer and track teams now compete in the 2,500-seat stadium on a synthetic turf field and a 400-meter eight-lane running track. (Photo 1)

At the bottom of the bleachers, a long concrete and asphalt walkway offers an accessible route between the entrance level and the field and tracks.

The grandstand along Alewife Brook Parkway contains an accessible pressbox, a fieldhouse building, and a concession and utility building. Beneath the grandstand are the storage facilities and accessible ticket booth and public multi-user toilet rooms.

The entry and control point for the facility occur along the west side of the grandstand. Although the entrance and exit gates are located on concrete surfaces, the path between them and the sidewalk or the parking lot consists of gravel, which is not accessible. (Photo 2)

It appears that accessible parking spaces have not been maintained since the last renovation. The markings of all eight accessible parking spaces, which include two van designated spaces, are degraded and is not highly visible. (Photo 3)



Photo 1



Photo 2



Photo 3

Boat House

The Boat House is located on the Mystic River Reservation at 32 Shore Drive. The boathouse is a DCR-owned facility that is leased to the Gentle Giant Rowing Club. (Photo 1)

The Club is a non-profit organization dedicated to introducing and nurturing the sport of rowing, regardless of age, culture, financial ability or physical capability. Gentle Giant Rowing supports the rowing program for Somerville High School that also uses this facility.

Accessible parking spaces are provided at this facility; however, moderate issues along the walkways leading to the entrance were identified. Additionally, no accessible picnic tables were found on site.

Although the ramp that leads to the public entrance is generally usable by persons with disabilities, it does not meet all of the requirements of applicable accessibility standards. (Photo 2)

At the top landing of the ramp, a perforation creates a tripping hazard to those entering or exiting this facility. Once inside, the counter near the entrance exceeds the maximum allowable height and both multi-user toilet rooms (one for each gender) are completely inaccessible. Although an accessible drinking fountain is provided in the lobby, storage items placed underneath it obstructs the approach to this fixture.

No interior signage is provided in this facility.

No accessible route is offered between the interior of the boat house and the boarding piers. Finally, this facility offers no accessible gangways or boat slips for residents with disabilities. (Photo 3)



Photo 1



Photo 2



Photo 3

Veterans Memorial Rink

The Veterans Memorial Rink sits in the middle of Conway Park on Somerville Avenue. The City of Somerville took over administration of this DCR-owned ice rink in the fall of 2010, and immediately introduced more public skate times and programs including hockey lessons and league play for both youths and adults.

Accessible parking is provided on the parking lot off Somerville Avenue. An accessible atgrade entrance is provided at this facility.

Once inside, sale and service counters, including counters for ticket sale, skate rental and concessions, exceed the maximum allowable height. Near the entrance, a wall-mounted external automatic defibrillator is a protruding object, which increases the likelihood of injuries among people with low or no vision or others who may be unobservant.

Throughout circulation paths within the building, several weather mats are not secure and can become tripping hazards to visitors and staff. Additionally, a trash can obstructs maneuvering clearance at entry door as well as access to the nearby pull station.

Multi-user toilet rooms are provided near the entrance. In both toilet rooms, the lavatories are mounted too low which obstructs the required knee clearance, and plumbing underneath the lavatories is unprotected. Inside the accessible stalls, the side grab bar does not meet minimum allowable height.

Except for signs at toilet rooms, no interior signage is provided at this facility.

Bleachers on one side of the ice rink are connected via an accessible ramp.

Recommendations

Priority 1 – Approach & Entrance

Parking & Drop-off Area (cost estimate – up to \$1,000)

1. At Dilboy Stadium, re-stripe parking spaces with missing or fading markings.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and General Site and Building Elements for Accessible Parking.

Sidewalks and Curb Ramps (cost estimate – up to \$25,000)

- 1. At the Boat House, repair or replace all deteriorated walkways.
- At Dilboy Stadium, provide at least one accessible route between the sidewalk, the parking lot, and the entrance and exits gates.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Accessible Routes and Curb Ramps.

Entrances (cost estimate – up to \$5,000)

 At the Boat House, provide edge protection along ramp that leads to the public entrance.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Ramps.

Priority 2 – Access to Goods & Services

Doors (cost estimate – up to \$5,000)

At the Boat House:

- When doors do not have the minimum clear width for accessible doors, either keep them open during regular hours or replace them with wider doors. Priority doors to the recreational boating facilities and doors to toilet rooms.
- 2. Replace door knobs with lever hardware.
- Create a comprehensive maintenance program and schedule to check and adjust the opening force of all exterior and interior doors. Where not possible, either keep heavy doors open during regular hours or add automatic openers.
- Provide an automatic opener wherever doors do not have the required maneuvering clearance on their latch side. Prioritize entry doors and doors to toilet rooms.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Doors, Doorways, and Gates.

Floor Surfaces (cost estimate – up to \$1,000)

 At Veterans Memorial Rink, secure all weather mats with industrial-strength double-stick tape. Alternatively, replace them with recessed walk-off mats or grates.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Floor Surfaces.

Protruding Objects (cost estimate – up to \$1,000)

 At Veterans Memorial Rink, install a canedetectable barrier to protect the wallmounted external automatic defibrillator near the entrance. Cane-detectable barriers could be trash cans, fixed panels, furniture, or other permanent barriers.

For additional information, please see Part E – ADA/MAAB References – Building Blocks for Protruding Objects.

Accessible Route

(cost estimate – TBD depending on scope)

 When the recreational boating facilities are renovated and made accessible, provide an accessible route between the interior of the Boat House and such facilities.

For additional information, please see Part E – ADA/MAAB References – Accessible Routes for Accessible Routes.

Sales and Service Counters (cost estimate – up to \$5,000)

- Short term: At the Boat House and Veterans Memorial Rink, provide an auxiliary counter with a maximum height of 36 inches in close proximity to the main counter, or provide equivalent facilitation. Equivalent facilitation may be provided in the form of a folding shelf attached to the main counter, an auxiliary table nearby, a clipboard made available to the public, or other means.
- Long Term: At the Boat House and Veterans Memorial Rink, provide accessible counters, including for ticket sale.

For additional information, please see Part E – ADA/MAAB References – ADA Reference – Built-in Elements for Sales and Service Counters.

Recreational Boating Facilities (cost estimate – TBD depending on scope)

 At the Boat House, recreational boating facilities will need to be made accessible when renovated.

For additional information, please see Part E – ADA/MAAB References – ADA Reference – Recreational Facilities for Recreational Boating Facilities.

Signage (cost estimate – up to 1,000)

- 1. At the Boat House, install accessible signage at all toilet rooms.
- At Veterans Memorial Rink, relocate the accessible signage to the latch side of the doors to the toilet rooms.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 3 – Toilet Rooms

Toilet Rooms (cost estimate – up to \$25,000)

- At the Boat House, modify both multi-user toilet rooms or establish a single-user accessible toilet room in the facility.
- 2. At Veterans Memorial Rink, make the following improvements in the multi-user toilet rooms near the entrance:
 - Raise the lavatories so that their underside is at least 27 inches above the floor.
 - b. Protect plumbing underneath the lavatories.
 - c. Inside the accessible stalls, raise the side grab bars so that they are mounted between 33 inches and 36 inches above the floor.

For additional information about addressing these issues, please see Part E – ADA Reference – Plumbing Elements and Facilities: Toilet and Bathing Rooms.

Signage (cost estimate – up to 1,000)

- 3. At the Boat House, install accessible signage at all toilet rooms.
- At Veterans Memorial Rink, relocate the accessible signage to the latch side of the doors to the toilet rooms.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and Communication Elements and Features for Signs. Please also see the Signage and Wayfinding section at the end of this report.

Priority 4 – Additional Access

Drinking Fountain (cost estimate – up to \$1,000)

 At the Boat House, remove the storage items places underneath the drinking fountain.

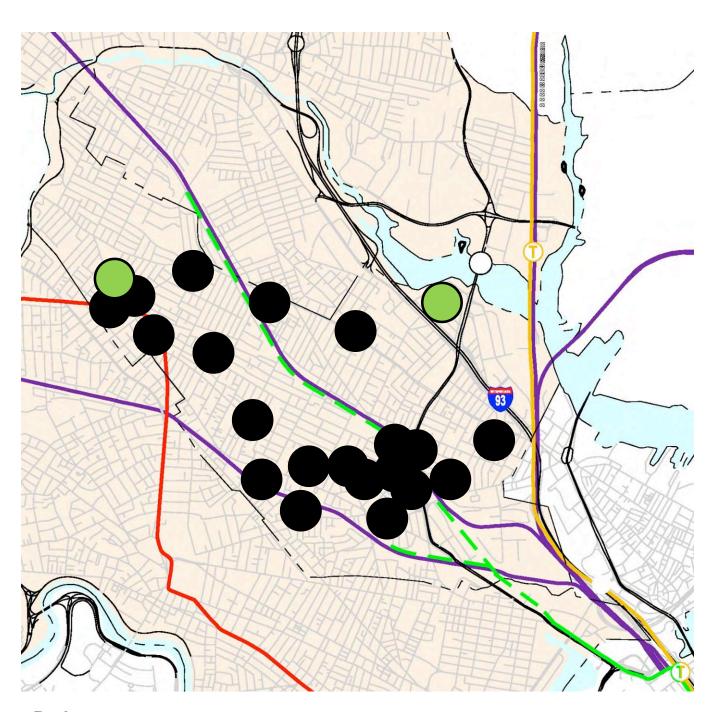
For additional information, please see Part E – ADA/MAAB References – Plumbing Elements and Facilities for Drinking Fountains.

Outdoor Amenities (cost estimate – up to \$5,000)

 At the Boat House, provide at least one accessible picnic table on an accessible routes.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements for Dining Surfaces and Work Surfaces.

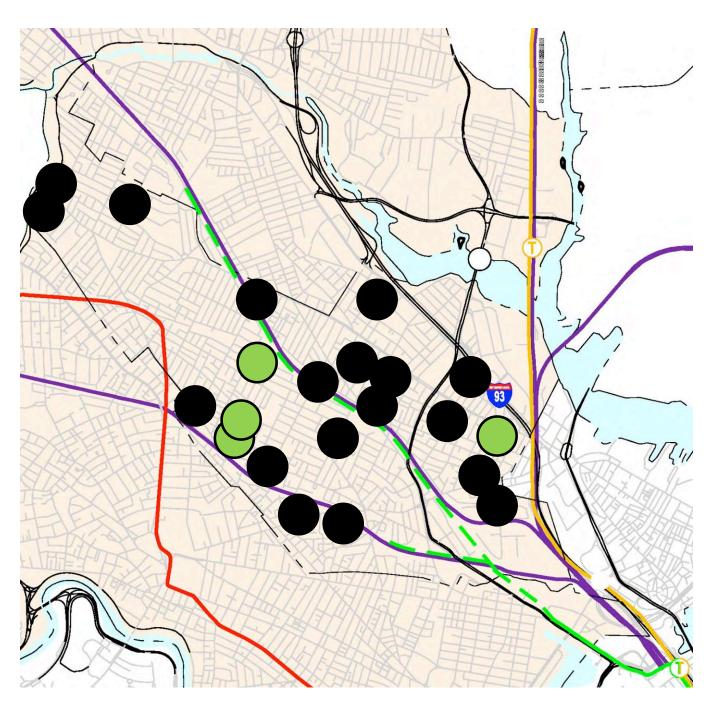




Parks

Bailey
Central Hill
Conway
Edward Leathers Community
Glenn

Grimmons Hodgkins-Curtin Kenney Lexington Lincoln/Argenziano School Nathan Tufts / Powderhouse North Street / Veterans Nunziato Field Osgood Paul Revere Perry Seven Hills Statue Stone Place Trum Field Walnut Street



Playgrounds

Harris

Albion **Cummings School** Dickerman East Somerville School Florence

Healy School Community Hoyt-Sullivan Kennedy School Community Marshal Street Morse-Kelley Otis

Palmacci **Perkins** Trum Winter Hill Community School Woodstock



Walnut Street Park

Parks and Playgrounds

Description

When viewed in entirety, newer and recently renovated parks and playgrounds are much more accessible and meet most accessibility requirements. Many of these are generally in the neighborhoods of Ten Hills, Spring Hill, and Davis. However, most of the facilities are older facilities generally had more substantial barriers. The types of barriers included the following conditions:

- Non-compliant curb ramps and sidewalks;
- Gates lacking smooth surfaces;
- Gate hardware that is inoperable with a closed fist;
- Broken or heaved walkways;
- Inaccessible drinking fountains because of insufficient clear space, knee clearance, uneven surfaces or controls requiring too much force or turning;
- Inaccessible playground play surfaces;
- Accessible play surfaces only connect to one or two play elements or are less than 60" wide;
- Lack of accessible routes connecting elements such as tables, benches, trash cans, BBQ, and each type of athletic facility or play element;
- Eroded or unmaintained surfaces at play structures, benches, or tables;
- Inaccessible picnic and chess/checker tables;
- Inaccessible benches;
- Protruding objects.



Photo 1



Photo 2



Photo 3

Albion Playground

Facility Information

Location: Albion Street

Ward: 5

Year Built: 1950

Year Renovated: 2009

Approach & Entrance:

 Pedestrian Crosswalks & Curb Ramps: accessible

Sidewalks: accessibleGates: inaccessible

Circulation:

· Walkways: accessible

Play Areas:

Playgrounds: provided, on accessible route

Water Spray: provided

Sports Areas:

Basketball Court

Tables & Seating:

3-top Tables: accessible Benches: provided

Other Amenities:

Drinking Fountains: accessible

Bike Racks: provided

· Community Garden: provided

This large playground has a unique layout – the play areas and basketball courts are separated by a large, elevated expanse of grass. There are picnic tables, water fountains and shady places aplenty at this recently renovated playground.



Photo 1



Photo 2



Photo 3

Bailey Park

Facility Information

 Location: Between Lowell & Belmont Streets

Ward: 3

· Year Built: unknown

Year Renovated: unknown

Approach & Entrance:

 Pedestrian Crosswalks & Curb Ramps: accessible

· Sidewalks: accessible

Circulation:

Walkways: accessible

Tables & Seating:

Benches: provided

Perched atop Spring Hill between Lowell and Belmont Streets, this simple park offers benches and old shade trees as well as a grassy knoll for picnicking or sunbathing. At just about 3/4 of an acre, this small park is designed with four walkways – two walkways lead to Lowell Street, two other to Belmont Street – leading to a central circle of benches.

Deteriorated surface within certain areas along the walkways can become tripping hazards to residents. One walkway that leads to Lowell Street is too steep and should have been treated as a ramp with railings on both sides.



Photo 1



Photo 2



Photo 3

Central Hill Park

Facility Information

Location: Highland Avenue

Ward: 3

Year Built: unknown

Year Renovated: unknown

Approach & Entrance:

 Pedestrian Crosswalks & Curb Ramps: missing curb ramp on route from High School

· Sidewalks: accessible

Circulation:

· Walkways: accessible

Tables & Seating:

Benches: provided, lack accessible space along side

Other Amenities:

Drinking Fountains: accessible

Central Hill Park sits between the High School and Library. It has a playground, tot lot, and benches. Walkways connect to nearby parking.



Photo 1



Photo 2



Photo 3

Conway Park

Facility Information

Location: Somerville Avenue

Ward: 2

· Year Built: unknown

Year Renovated: unknown

Approach & Entrance:

Parking: accessibleGates: inaccessible

Circulation:

Walkways: accessible

Play Areas:

Playgrounds: provided, not all on accessible routes

· Water Spray: provided

Sports Areas:

· Baseball Field

Basketball Court

Skate Rink

Tables & Seating:

Benches: provided

Picnic Tables: inaccessible

Other Amenities:

· Bike Racks: provided

The city's flagship park, this 4.5-acre site boasts two basketball courts, two indoor skate rinks, two baseball fields also used for soccer and football, a large playground, a water play area, and parking. Picnic tables and shaded seating as well as a storytelling path with city facts and history are also found in this park.



Photo 1



Photo 2



Photo 3

Cummings School Playground

Facility Information

Location: Cummings School

Ward: 3

Year Built: unknown

· Year Renovated: unknown

Approach & Entrance:

 Pedestrian Crosswalks & Curb Ramps: accessible

Sidewalks: accessibleGates: inaccessible

Circulation:

 Walkways: some tripping hazards especially where play surface meets asphalt, uneven surfaces on basketball court

Play Areas:

Playgrounds: provided, on accessible route

Sports Areas:

Basketball Court

Located at the former Cummings School, this playground consists of a medium sized play structure and a basketball court. The surface under the play structure is a soft rubber while the rest of the playground is blacktop. Where these surfaces meet there can be a substantial tripping hazard.



Photo 1



Photo 2



Photo 3

Dickerman Playground

Facility Information

 Location: Craigie, Kimball & Ibbetson Streets

Ward: 3

Year Built: unknownYear Renovated: 2012

Approach & Entrance:

 Pedestrian Crosswalks & Curb Ramps: missing at intersection of Kimball and lbbetson Streets

Sidewalks: accessible, steep grade at certain areas

Gates: inaccessible

Circulation:

 Walkways: accessible except for lbbertson entrance

Ramp: accessible

Stairways: missing handrails on Kimball and Ibbetson Streets

Play Areas:

Playgrounds: inaccessibleWater Spray: provided

Sports Areas:

Bocce Court

Tables & Seating:

8-Top Tables: accessible
Picnic Tables: accessible

Benches: provided

Other Amenities:

· Drinking Fountains: accessible

· Bike Racks: provided

This recently renovated playground offers two separate levels connected by a stairway, a walkway, and a ramp.



Photo 1



Photo 2



Photo 3

Edward Leathers Community Park

Facility Information

Location: Walnut Street

Ward: 1

Year Built: unknown

Year Renovated: unknown

Approach & Entrance:

Gates: inaccessible

Circulation:

 Walkways: no accessible route to seating circle wall, some tripping hazards especially on gravel paths, very steep slope at dog area

Tables & Seating:

 Benches: 11 provided all on accessible path but only 3 with space along side

Other Amenities:

Dog Park Area

The nearly ¾ acre Edward Leathers Community Park features benches, accessible picnic tables, a few climbing elements and an off leash dog park. Some walkways are concrete while others are eroded stone dust paths. Barriers exist where paths have eroded or tree roots have surfaced. Additional, there is no accessible route to the stone seating circle wall.



Photo 1



Photo 2



Photo 3

Florence Playground

Facility Information

Location: Florence Street

• Ward: 1

Year Built: unknown

Year Renovated: unknown

Approach & Entrance:

 Pedestrian Crosswalks & Curb Ramps: accessible

Sidewalks: accessibleGates: inaccessible

Circulation:

 Walkways: a lot of uneven ground surface

Play Areas:

Playgrounds: provided, not on accessible route

Sports Areas:

· Basketball court

Tables & Seating:

- Picnic Tables: inaccessible, not enough depth of clearance
- Benches: inaccessible, either nor clear space alongside or not on accessible route

Other Amenities:

Drinking Fountains: accessible

· Bike Racks: provided

Florence playground consists of ample paved space, multiple benches, a basketball court and a set of play structures with a wood chip ground covering underneath them. There are several trees in the park that provide ample shade.



Photo 1



Photo 2



Photo 3

Glen Park

Facility Information

Location: Glen Street

Ward: 1

Year Built: unknown

Year Renovated: unknown

Approach & Entrance:

Parking Lot: no curb cut

· Gates: inaccessible

Circulation:

 Walkways: numerous wide grate openings, other than that pathways are accessible

Play Areas:

Playgrounds: provided, on accessible route

Sports Areas:

Soccer Field

Tables & Seating:

Benches: provided

The field and play structure appear to be new and well maintained. There is ample traveling room throughout the park for wheelchair users to navigate. The field itself has a new astroturf surface.

The park sits between the Capuano Early Childhood Education Center and the Glen Community Garden.



Photo 1



Photo 2



Photo 3

Grimmons Park

Facility Information

 Location: Governor Winthrop & Puritan Roads

Ward: 4

Year Built: unknownYear Renovated: 2009

Approach & Entrance:

 Pedestrian Crosswalks & Curb Ramps: accessible

Sidewalks: accessibleGates: inaccessible

Circulation:

Walkways: accessibleStairways: accessible

Play Areas:

Playgrounds: provided, on accessible route

Sports Areas:

Basketball Court

Tables & Seating:

4-top tables: accessibleBenches: provided

Other Amenities:

Drinking Fountains: accessible

Bike Racks: provided

The official park of the nearby Charles A. Grimmons School, this recently renovated, child-friendly park is also open to the public. The park can be accessed either through Governor Winthrop Road or via a stairway on Puritan Road.



Photo 1



Photo 2



Photo 3

Healey School Community Playground

Facility Information

Location: Meacham Street

• Ward: 4

Year Built: unknown

Year Renovated: unknown

Approach & Entrance:

 Pedestrian Crosswalks & Curb Ramps: accessible

Sidewalks: accessibleGates: inaccessible

Circulation:

· Walkways: accessible

Play Areas:

Playgrounds: provided, not on accessible route

Tables & Seating:

· Benches: provided

Other Amenities:

Bike Racks: provided

Positioned on a cozy dead-end street, the Healy School Community Playground is a multicolored collection of slides, swings and a myriad of bars and ladders. Surrounded by trees, the shady grounds are covered with wood chips. Located directly outside the classrooms of the Arthur D. Healy Elementary School, the sturdy, shiny playground features a matching game and two towers connected by a bridge.



Photo 1



Photo 2



Photo 3

Hodgkins-Curtin Park

Facility Information

 Location: Holland, Paulina & Simpson Streets

Ward: 7

Year Built: unknownYear Renovated: 2010

Approach & Entrance:

 Pedestrian Crosswalks & Curb Ramps: accessible

Sidewalks: accessibleGates: inaccessible

Circulation:

· Walkways: accessible

Play Areas:

Playgrounds: accessible, on accessible route

Sports Areas:

· Baseball Field

Tables & Seating:

4-top tables: accessiblePicnic Tables: accessibleBenches: provided

Other Amenities:

Drinking Fountains: accessible

Bike Racks: provided

This newly renovated park reopened with a brand new design, an expanded ball field, and loads of play equipment for children of all ages. All of it sits atop a soft surface surrounded by plenty of shade trees and picnic tables, including an accessible table. Paths around play areas provide easy access.



Photo 1



Photo 2



Photo 3

Hoyt-Sullivan Playground

Facility Information

Location: Central Street

Ward: 5

Year Built: unknownYear Renovated: 1995

Approach & Entrance:

 Pedestrian Crosswalks & Curb Ramps: accessible

Sidewalks: accessibleGates: inaccessible

Circulation:

 Walkways: inaccessible – benches, play areas, and tables are not on an accessible route to entrance.

Play Areas:

Playgrounds: provided, not on accessible route

Sports Areas:

Basketball Court

Tables & Seating:

• Picnic Tables: inaccessible

· Benches: provided

Other Amenities:

Drinking Fountains: accessible

Bike Racks: provided

Hoyt-Sullivan Playground is a shady playground with two separate play areas and a basketball court. Most benches, play areas, and tables are not on an accessible route to entrance since much of the wood chip surface has not been maintained in recent years. Hoyt-Sullivan is occasionally the site for community activities.



Photo 1



Photo 2



Photo 3

Kennedy School Community Playground

Facility Information

Location: Elm Street

Ward: 5

Year Built: unknown

Year Renovated: unknown

Approach & Entrance:

 Pedestrian Crosswalks & Curb Ramps: accessible

Sidewalks: accessibleGates: inaccessible

Circulation:

Walkways: accessible

Ramp: drop-off edge protection is not provided.

 Stairways: at top of stairway, edge of concrete step and asphalt walkway creates a tripping hazard. Handrails are not provided.

Play Areas:

Playgrounds: provided, on accessible route

Tables & Seating:

· Benches: provided

Other Amenities:

Bike Racks: not provided

This playground is located behind the Kennedy School off Elm Street. A long play area, benches, and a stage area connected by stairways and a ramp are lined with a steep berm used as a small garden. One end of the playground is very close to the school's swimming pool machine room which is extremely noisy for extended periods of time.



Photo 1



Photo 2



Photo 3

Kenney Park

Facility Information

 Location: Highland Avenue & Grove Street

Ward: 6

Year Built: unknown

Year Renovated: unknown

Approach & Entrance:

 Pedestrian Crosswalks & Curb Ramps: deteriorated curb ramps at intersection

 Sidewalks: moderate issues within brick surfaces

Gates: inaccessible

Circulation:

· Walkways: accessible

Play Areas:

Playgrounds: provided, not on accessible route

Water Spray: provided

Sports Areas:

Basketball Court

Tables & Seating:

Benches: provided

Other Amenities:

Drinking Fountains: accessible

Bike Racks: provided

Kenney Park is located on the edge of Davis Square at the corner of Highland Avenue and Grove Street. Renovated in the mid-90's, Kenney Park features a basketball court, a water spray area, and a large playground. It's occasionally the site for community activities as well.



Photo 1



Photo 2



Photo 3

Lexington Park

Facility Information

Location: Lexington Street

Ward: 5

Year Built: unknown

· Year Renovated: unknown

Approach & Entrance:

 Pedestrian Crosswalks & Curb Ramps: accessible

Sidewalks: accessibleGates: inaccessible

Circulation:

· Walkways: accessible

Play Areas:

Playgrounds: provided, not on accessible route

Water Spray: provided

Sports Areas:

Basketball Court

Tables & Seating:

2-top Tables: accessible4-top Tables: inaccessible

· Benches: provided

Other Amenities:

Drinking Fountains: inaccessible

Under huge, brightly painted gates and tall shade trees sits Lexington Park. There are multiple jungle gyms, child- and baby-size swings, several picnic tables and an enclosed basketball court. A walkway perpendicular to Lexington Street offers a connection to the adjacent bike path.



Photo 1



Photo 2



Photo 3

Lincoln/Argenziano School Park

Facility Information

 Location: Lincoln Parkway & Perry Street

• Ward: 2

Year Built: unknown

Year Renovated: unknown

Approach & Entrance:

 Pedestrian Crosswalks & Curb Ramps: accessible as school side, not at other

Gates: inaccessible

Circulation:

 Walkways: Uneven surface throughout much of the park, large grate openings, no accessible route to playing fields

Play Areas:

Playgrounds: provided, not on accessible

Sports Areas:

- Basketball Court
- Softball Field
- Soccer Field

Tables & Seating:

 Benches: provided; some are not on accessible path, many have no accessible space alongside

Other Amenities:

Drinking Fountains: inaccessible

This large park has numerous grass and sports field areas as well as a basketball court. There are many paved path on which to travel throughout the park; however, these are poorly maintained, particularly in the area farthest from the school, and make use of the paths difficult for wheelchair users.



Photo 1



Photo 2



Photo 3

Marshall Street Playground

Facility Information

Location: Marshall Street

Ward: 4

Year Built: unknown

Year Renovated: unknown

Approach & Entrance:

 Pedestrian Crosswalks & Curb Ramps: accessible

Sidewalks: accessibleGates: inaccessible

Circulation:

 Walkways: water pooling areas, uneven surface

Play Areas:

Playgrounds: provided, not on accessible route

Tables & Seating:

- Benches: 11 provided, 8 not on accessible route, all lack clear space along side
- Picnic tables: Not on accessible route, on uneven ground surface

This playground has a small paved area near the entrance. The rest of playground is dirt covered with wood-chippings, including the locations of the play structure and the majority of the benches. The surfaces under some of the benches and picnic tables have eroded significantly causing uneven ground levels and benches to be two or more feet above the surface.



Photo 1



Photo 2



Photo 3

Morse-Kelley Playground

Facility Information

Location: Summer and Craigie Streets

• Ward: 3

Year Built: 1985

• Year Renovated: 2012

Approach & Entrance:

 Pedestrian Crosswalks & Curb Ramps: accessible

Sidewalks: accessibleGates: inaccessible

Circulation:

Walkways: accessibleStairways: accessible

Play Areas:

Playgrounds: provided, on accessible route

Sports Areas:

- Basketball Court
- Skate Park

Tables & Seating:

 Chess/Checker Board Tables: inaccessible

Picnic Tables: accessibleBenches: provided

Other Amenities:

Drinking Fountains: accessible

Bike Racks: provided

Community Garden: provided

This expansive site offers a number of basketball courts, a gazebo for hanging out in the shade, and a small play area. This recently renovated playground also offers a new skate park and community garden.



Photo 1



Photo 2



Photo 3

Nathan Tufts/Powderhouse Park

Facility Information

 Location: Broadway & College & Liberty Avenues

Ward: 6

Year Built: unknown

Year Renovated: unknown

Approach & Entrance:

 Pedestrian Crosswalks & Curb Ramps: accessible

Sidewalks: accessible, steep in certain areas

Circulation:

Walkways: accessible, steep in certain areas

Stairways: missing handrails on both sides

Tables & Seating:

Benches: provided

Other Amenities:

Bike Racks: provided

The Nathan Tufts / Powderhouse Park retains the graceful curving paths and stately landscaping intended by the original designers. Used mostly for passive recreation, it offers a peaceful respite from busy Powder House Square. The asphalt walkways can be steep at times and benches are not often placed on level surfaces. Stairways without handrails can be found at several points along the walkway.

Located on College Avenue, the Tufts Field House is used for youth programs and community meetings. Low-hanging vegetation in certain areas creates a headroom issue along the walkways.



Photo 1



Photo 2



Photo 3

North Street / Veterans Park

Facility Information

Location: North Street

Ward: 7

Year Built: unknown

Year Renovated: unknown

Approach & Entrance:

 Pedestrian Crosswalks & Curb Ramps: accessible

Sidewalks: accessibleGates: inaccessible

Circulation:

· Walkways: accessible

Play Areas:

 Playgrounds: provided but not on accessible route

Sports Areas:

Basketball Court

Tables & Seating:

Picnic Tables: inaccessible

· Benches: provided

Other Amenities:

Drinking Fountains: inaccessible

This local public park is located nearby the Veteran's Cemetery. It offers a playground, in addition to two basketball courts, hopscotch courts, and rest areas.



Photo 1



Photo 2



Photo 3

Nunziato Field

Facility Information

Location: Putnam Street

Ward: 3

Year Built: unknown

Year Renovated: unknown

Approach & Entrance:

Sidewalks: accessibleGates: inaccessible

Circulation:

Walkways: accessible walkways do not connect to each type of feature

Tables & Seating:

Picnic Tables: provided, not on accessible route

The majority of this park is a large field for general use with some picnic tables near one entrance. There is a smaller section of the park that is an off-leash section where local residents bring their dogs. Few features of this park are connected to an accessible route.



Photo 1



Photo 2



Photo 3

Osgood Park

Facility Information

Location: Osgood Street

Ward: 2

Year Built: unknown

Year Renovated: unknown

Approach & Entrance:

 Sidewalks: uneven sidewalk at the entrance to the play structure area

Gates: inaccessible

Circulation:

· Walkways: accessible

Play Areas:

Playgrounds: provided, not on accessible route

Tables & Seating:

• Picnic Tables: inaccessible play surface

Other Amenities:

Drinking Fountains: inaccessible

This park is split into two sections, one with a swing set and the other, across the road, with a large play structure. The walkways up to the swings and the play structure are made of a soft rubber that banks off sharply into woodchip making it precarious for individuals using wheelchairs or other mobility devices. Consequently, the width of the accessible surface is insufficient to permit side transfers or turning around safely.



Photo 1



Photo 2



Photo 3

Otis Playground

Facility Information

 Location: Otis Street and McGrath Highway

• Ward: 1

· Year Built: unknown

Year Renovated: unknown

Approach & Entrance:

 Pedestrian Crosswalks & Curb Ramps: accessible

Sidewalks: accessibleGates: inaccessible

Circulation:

 Walkways: Lacks smooth surface, overhead walkway produces hazard

Play Areas:

Playgrounds: provided, not on accessible route

Tables & Seating:

Picnic Tables: inaccessible

Other Amenities:

· Drinking Fountains: inaccessible

Located near McGrath Highway and adjacent to the inaccessible pedestrian overpass, Otis Playground has a large play structure as well as a water feature. There is also a swing set that is somewhat separated from the rest of playground by the ramp for the pedestrian bridge. Most of the ground space is paved, except for the wood chip covered area surrounding the play structure and the swings. The pedestrian bridge is an unprotected protruding object.



Photo 1



Photo 2



Photo 3

Palmacci Playground

Facility Information

Location: Hanson and Skehan Streets

Ward: 2

Year Built: unknown

· Year Renovated: unknown

Approach & Entrance:

Pedestrian Crosswalks & Curb Ramps:?

Sidewalks: accessibleGates: inaccessible

Circulation:

• Walkways: accessible

Play Areas:

Playgrounds: provided, on accessible route

Tables & Seating:

· Benches: provided

Other Amenities:

Drinking Fountains: inaccessible

Palmacci Playground is tucked away in a residential area. It consists of a paved area with ample seating and a new play structure. The ground surface is paved in the main seating area outside the gate and a soft rubber surrounding the play structure.



Photo 1



Photo 2



Photo 3

Paul Revere Park

Facility Information

 Location: Highland Avenue & Grove Street

Ward: 5

Year Built: 1910

Year Renovated: unknown

Approach & Entrance:

 Pedestrian Crosswalks & Curb Ramps: inaccessible

 Sidewalks: deteriorated concrete surface creates tripping hazards

Tables & Seating:

Benches: not provided

This tiny triangle-shaped park at the intersection of Broadway and Main Street is enclosed by fence on all sides. A tall evergreen tree creates a headroom issue on the Broadway side and deteriorated sidewalk can be found on the Main Street side. Nearby curb ramps leading to this park are either too steep or deteriorated.



Photo 1



Photo 2

Perkins Playground

Facility Information

Location: Perkins Street

• Ward: 1

Year Built: unknown

Year Renovated: unknown

Approach & Entrance:

Gates: inaccessible

Circulation:

Walkways: accessibleStairways: accessible

Play Areas:

Playgrounds: provided, on accessible route

Sports Areas:

Basketball Court

Tables & Seating:

- Chess/Checker Board Tables: inaccessible
- Picnic Tables: 2 accessible out of 5
- Benches: provided

Perkins Playground is mostly paved with asphalt as well as some areas that are covered in soft rubber. Its features include kinetic play pieces, a basketball hoop, swings, and picnic tables. It is one of the few parks with accessible picnic tables.



Photo 1



Photo 2



Photo 3

Perry Park

Facility Information

· Location: Washington Street

Ward: 2

Year Built: unknown

Year Renovated: unknown

Circulation:

Walkways: issue with water pooling

Approach & Entrance:

• Sidewalks: Accessible

 Gates: excessive slopes, lack smooth surface

Tables & Seating:

 Benches: provided, lack accessible space alongside

Play Areas:

Playgrounds: provided, on accessible route

Other Amenities:

Drinking Fountains: inaccessible

Perry Park is new construction with ample general green space. This park has a fenced in playground area with smaller structures instead of the traditional large play structure. A single gate is provided though a second gate at the other end should be considered to improve safety and accessibility. The play structure that are present are mostly kinetic and there is a jungle gym.



Photo 1



Photo 2



Photo 3

Seven Hills Park

Facility Information

 Location: Meacham & Buena Vista Roads

Ward: 6

Year Built: unknown

Year Renovated: unknown

Approach & Entrance:

 Pedestrian Crosswalks & Curb Ramps: accessible

· Sidewalks: accessible

Circulation:

 Walkways: moderate issues within brick surfaces

• Ramp: accessible

• Stairways: non-compliant handrails

Tables & Seating:

Benches: provided

Other Amenities:

Bike Racks: provided

Tucked behind the Davis Square T station on Holland Avenue, this park includes a tree-lined promenade and grassy areas used for outdoor concerts and other public activities.



Photo 1



Photo 2



Photo 3

Statue Park

Facility Information

 Location: College Avenue & Holland Street

Ward: 6

Year Built: unknown

Year Renovated: unknown

Approach & Entrance:

- Pedestrian Crosswalks & Curb Ramps: moderate to severe issues within brick surfaces
- Sidewalks: moderate to severe issues within brick surfaces

Circulation:

 Walkways: moderate to severe issues within brick surfaces

Tables & Seating:

8-top Tables: accessibleBenches: provided

Other Amenities:

Drinking Fountains: accessible

· Bike Racks: provided

This small park at the heart of Davis Square offers plenty of tables and seating for residents. Moderate to severe issues within brick surfaces can create tripping hazards or even barriers.



Photo 1



Photo 2



Photo 3

Trum Playground

Facility Information

 Location: Cedar Street and Franey Road

• Ward: 5

Year Built: 1985

Year Renovated: unknown

Approach & Entrance:

 Pedestrian Crosswalks & Curb Ramps: accessible

Sidewalks: accessibleGates: inaccessible

Circulation:

 Walkways: manhole covers create tripping hazards

Play Areas:

Playgrounds: provided, mostly on accessible route

Water Spray: provided

Sports Areas:

Basketball Court

Skate Park

Tables & Seating:

• 4-Top Tables: accessible

Benches: provided

Other Amenities:

Drinking Fountains: accessible

· Bike Racks: provided

This spacious playground resides next to Trum Field and offers a play area and water spray in addition to large rest and shade areas.



Photo 1



Photo 2



Photo 3

Trum Field

Facility Information

- Location: Broadway, Cedar Street,
 Franey & Charles E Ryan Roads
- Ward: 5

Year Built: unknownYear Renovated: 2008

Approach & Entrance:

- Pedestrian Crosswalks & Curb Ramps: accessible
- Sidewalks: accessible along Broadway, moderate issues along other streets

Circulation:

- Walkways: accessible along Broadway, moderate issues along other streets
- · Ramps: accessible
- Stairways: accessible along Broadway, missing handrails along other streets

Sports Areas:

- · Baseball Field lack accessible seating
- Basketball Courts

Tables & Seating:

Benches: provided

Other Amenities:

Drinking Fountains: accessible

Bike Racks: provided

Since its 2008 renovation, many accessibility improvements were performed at Trum Field, such as walkways to the field house and ramp and stairways to the fields. Although areas along Broadway are in good conditions, other points of entry along other streets were not maintained, including the stairway at the intersection of Cedar Street and Franey Road.



Photo 1



Photo 2



Photo 3

Walnut Street Park

Facility Information

Location: Walnut Street

Ward: 3

Year Built: unknown

Year Renovated: unknown

Approach & Entrance:

 Ramp: ramp at entrance exceeds maximum allowable slope and has no handrails

Gates: inaccessible

Circulation:

 Walkways: multiple tripping hazards at places where surfaces meet

Play Areas:

Playground: provided, on accessible route

Other Amenities:

Drinking Fountains: inaccessible

Walnut Street Park is slightly less than ¼ acre with benchs and playground. Though mostly accessible, tripping hazards are present where surfaces meet.



Photo 1



Photo 2



Photo 3

Winter Hill Community School Playground

Facility Information

- Location: Winter Hill Community School
- Ward: 4
- Year Built: unknown
- Year Renovated: unknown

Approach & Entrance:

- Pedestrian Crosswalks & Curb Ramps: accessible
- Sidewalks: accessible
- Gates: inaccessible
- · Stairs: Non-compliant railings on stairs
- Ramp: Many sections of ramps are too steep and some are missing railings

Circulation:

 Walkways: Many uneven surfaces, grate with large holes and tripping hazards

Play Areas:

Playgrounds: provided, not on accessible route

Sports Areas:

· Basketball Courts

Tables & Seating:

 Benches: provided, not on accessible path, too high

This expansive playground is located at the Winter Hill Community School. There are several basketball courts on different levels connected by ramps. The play structure sits at the highest level surrounded by a fence. The surface around the structure is wood chips and is the only non-paved portion of the playground.



Photo 1



Photo 2



Photo 3

Woodstock Playground

Facility Information

 Location: Alewife Brook Parkway and Woodstock Street

Ward: 7

Year Built: unknown

Year Renovated: unknown

Approach & Entrance:

 Pedestrian Crosswalks & Curb Ramps: missing at intersection of Alewife Brook Parkway and Woodstock Street

Sidewalks: accessibleGates: inaccessible

Circulation:

Walkways: accessibleStairways: accessible

Play Areas:

Playgrounds: provided, mostly on accessible route

Sports Areas:

Basketball Court

Tables & Seating:

2-Top Tables: inaccessible4-Top Tables: inaccessible

Benches: provided

Other Amenities:

Drinking Fountains: accessible

· Bike Racks: not provided

This shaded playground is centered around a play area with tables. A walkway and stairway lead to the small basketball court next to Clarendon Hill Towers.



Photo 1



Photo 2



Photo 3

New Washington Street Dog Park

Facility Information

Location: New Washington St

Ward: 1

Year Built: unknown

Year Renovated: unknown

Approach & Entrance:

Gates: accessible

Stairways: handrails are not provided

Circulation:

 Walkways: lack a 5'X5' passing space and is over 200' long

Tables & Seating:

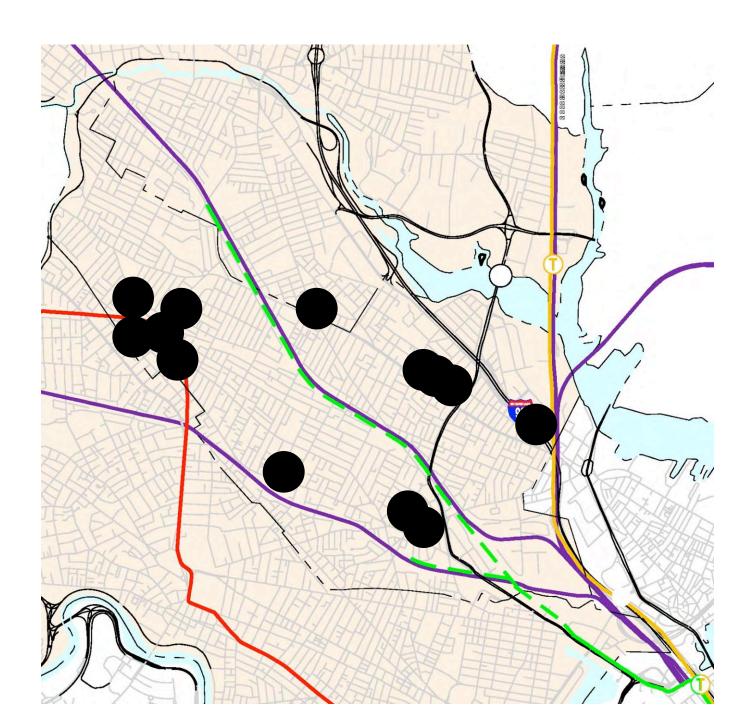
 Benches: provided, no accessible space along side

Other Amenities:

Drinking Fountains: inaccessible

New Washington Dog Park is ¾ of an acre along the Inner Belt. It features numerous places to sit. Though new, three significant inaccessible conditions were identified: stairs without handrails; benches without an accessible space alongside; a walkway narrower than 60 inch but over 200 feet long without passing space.





Parking Lots

Buena Vista Cutter Square Day Street Foss Park Grove Street A Grove Street B
Magoun Square
Mount Vernon Street
Prospect Hill
Union Square

Veterans Memorial Rink Winter Hill A Winter Hill B



Day Street Parking Lot

Parking Lots

While Somerville owns, operates, and maintains at least 13 parking lots, it is worth noting the following systemic City-wide issues:

- Some lots do not provide accessible parking spaces;
- Where provided, accessible parking spaces lack access aisles;
- Accessible parking spaces and access aisles routinely exceed maximum slope requirements (2% slope);
- Van spaces are not identified;
- Signage identifying spaces is generally missing;
- Where provided, signage is too low.

Additionally, while not covered by IHCD's contract, IHCD notes with concern the significant lack of on-street accessible parking in various squares and neighborhoods. It would be advisable for Somerville to note the upcoming Pedestrian Rights of Way requirements of section R214 that state the following:

Where on-street parking is provided on the block perimeter and the parking is marked or metered, accessible parking spaces complying with R309 shall be provided. Where parking pay stations are provided and the parking is not marked, each 6.1 m (20.0 ft) of block perimeter where parking is permitted shall be counted as one parking space. 1 Accessible space for every 25 marked or metered spaces on the block perimeter up to 200 spaces. For 201 spaces and over, the minimum number of accessible spaces shall be 4% of the total on the block perimeter.



Photo 1



Photo 2



Photo 3

Buena Vista Parking Lot

Facility Information

- Location: Buena Vista Road
- Ward: 6
- Year Built: unknown
- Year Renovated: unknown

Approach & Entrance:

- Pedestrian Crosswalks & Curb Ramps: accessible
- Sidewalks: deteriorated brick surface in certain areas (specially along Buena Vista Road) create tripping hazards

Number of Parking Spaces:

- Total Number of Parking Spaces: 59, plus approximately 32 business permit parking spaces
- Total Number of Required Accessible Parking Spaces: 4 (three are required)
- Total Number of Van Parking Spaces: 0
 (at least one is required)

Major Issues Found:

- No van designated space is provided
- Access aisles alongside parking spaces do not meet minimum allowable width
- Excessive slopes within parking spaces perpendicular to Holland Street
- Markings are not highly visible
- Signs are missing and or mounted below 60 inches above the ground



Photo 1



Photo 2



Photo 3

Cutter Square Parking Lot

Facility Information

- Location: Elm and Summer Streets, Cutter Avenue
- Ward: 7
- Year Built: unknown
- Year Renovated: unknown

Approach & Entrance:

- Pedestrian Crosswalks & Curb Ramps: missing pedestrian crosswalks and curb ramps at both entrances of parking lot
- Sidewalks: deteriorated sidewalk at intersection of Elm Street and Cutter Avenue

Number of Parking Spaces:

- Total Number of Parking Spaces: 12
- Total Number of Required Accessible Parking Spaces: 0 (at least one is required)
- Total Number of Van Parking Spaces: 0

 (at least one is required)

Major Issues Found:

- No accessible parking space is provided
- Moderate to severe issues with sidewalks and walkways
- No accessible route is provided to the shaded seating area adjacent to this parking facility



Photo 1



Photo 2



Photo 3

Day Street Parking Lot

Facility Information

Location: Day & Herbert Streets

Ward: 6

Year Built: unknown

Year Renovated: unknown

Approach & Entrance:

 Pedestrian Crosswalks & Curb Ramps: accessible

Sidewalks: partially accessible

Number of Parking Spaces:

Total Number of Parking Spaces: 61

 Total Number of Accessible Parking Spaces: 3

 Total Number of Van Parking Spaces: 0 (at least one is required)

Major Issues Found:

No van designated space is provided

 Access aisles alongside parking spaces are not provided

 Excessive slopes within parking spaces, especially near the catch basin

• Signs, where provided are mounted below 60 inches above the ground



Photo 1



Photo 2



Photo 3

Foss Park Parking Lot

Facility Information

Location: Broadway

Ward: 1

Year Built: unknown

· Year Renovated: unknown

Approach & Entrance:

- Pedestrian Crosswalks & Curb Ramps: significant tripping hazards at curb ramps, curb ramps have excessive slopes and lack level landings
- Sidewalks: At drive way, the pedestrian access route has cross slopes in excess of 3%
- Desire lines to median bus stops do not necessarily align with cross walks and curb ramp locations

Number of Parking Spaces:

- Total Number of Parking Spaces: 27
- Total Number of Accessible Parking Spaces: 0
- Total Number of Van Parking Spaces: 0 (at least one is required)

Major Issues Found:

- Foss Park Parking Lot contains no accessible spaces.
- There are issues with 2-4" lips at curb cuts and access to the bus stop located on one of the island separating the parking lot from the main road.



Photo 1



Photo 2



Photo 3

Grove Street Parking Lot A

Facility Information

- Location: Grove Street and Highland Avenue
- Ward: 6
- · Year Built: unknown
- Year Renovated: unknown

Approach & Entrance:

- Pedestrian Crosswalks & Curb Ramps: accessible
- · Sidewalks: accessible

Number of Parking Spaces:

- Total Number of Parking Spaces: 25, plus approximately 35 business permit parking
- Total Number of Accessible Parking Spaces: 2 (3 are required)
- Total Number of Van Parking Spaces: 0 (at least one is required)

Major Issues Found:

- Moderate issues with sidewalks and walkways
- No van designated space is provided
- Accessible parking spaces do not meet the minimum required number
- Access aisles alongside parking spaces are not provided



Photo 1



Photo 2



Photo 3

Grove Street Parking Lot B

Facility Information

Location: Grove Street

Ward: 6

Year Built: unknown

· Year Renovated: unknown

Approach & Entrance:

- Pedestrian Crosswalks & Curb Ramps: deteriorated curb ramps at intersections
- Sidewalks: moderate issues within brick surfaces

Number of Parking Spaces:

- Total Number of Parking Spaces: 9, plus approximately 11 business permit parking
- Total Number of Accessible Parking Spaces: 0 (at least one is required)
- Total Number of Van Parking Spaces: 0 (at least one is required)

Major Issues Found:

- Accessible parking spaces are not provided
- Several tripping hazards caused by deteriorated brick surface on the sidewalk along Grove Street



Photo 1



Photo 2



Photo 3

Magoun Square Parking Lot

Facility Information

 Location: Broadway and Medford Streets

• Ward: 5

Year Built: unknown

Year Renovated: unknown

Approach & Entrance:

 Pedestrian Crosswalks & Curb Ramps: accessible

· Sidewalks: accessible

Number of Parking Spaces:

Total Number of Parking Spaces: 50

 Total Number of Accessible Parking Spaces: 3 (two are required)

 Total Number of Van Parking Spaces: 0 (at least one is required)

Major Issues Found:

No van designated space is provided

 Center and rightmost accessible parking spaces slightly exceed the maximum allowable slopes

 Access aisle on the right is too narrow and is not served by a curb ramp.

Slightly excessive slopes within parking spaces

 Signs identifying the center accessible parking space is missing

 No accessible parking spaces are offered at other areas of the parking lot, including pedestrian access to Medford Street and Fisk Avenue



Photo 1

Mount Vernon Street Parking Lot

Facility Information

 Location: Broadway and Medford Streets

• Ward: 1

Year Built: unknown

Year Renovated: unknown

Approach & Entrance:

 Pedestrian Crosswalks & Curb Ramps: accessible

• Sidewalks: accessible

Number of Parking Spaces:

Total Number of Parking Spaces: 10 including 1 ZipCar space

 Total Number of Accessible Parking Spaces: 0

Total Number of Van Parking Spaces: 0

Major Issues Found:

No accessible parking spaces provided



Photo 1



Photo 2

Prospect Street Parking Lot

Facility Information

 Location: Somerville Avenue and Washington Street

• Ward: 2

Year Built: unknown

Year Renovated: unknown

Approach & Entrance:

 Pedestrian Crosswalks & Curb Ramps: inaccessible

· Sidewalks: accessible

Number of Parking Spaces:

Total Number of Parking Spaces: 18

 Total Number of Accessible Parking Spaces: 1

Total Number of Van Parking Spaces: 0

Major Issues Found:

Accessible space has no access aisle

No van designated space

 The pavement is heaved and therefore not level. Other than the spots where the pavement is broken the surface of the parking lot is flat.



Photo 1



Photo 2



Photo 3

Union Square Parking Lot

Facility Information

- Location: Somerville Avenue and Washington Street
- Ward: 2
- · Year Built: unknown
- Year Renovated: unknown

Approach & Entrance:

- Pedestrian Crosswalks & Curb Ramps: tripping hazards on curb ramp, excessive run slope
- Sidewalks: uneven surface, excessive cross slope

Number of Parking Spaces:

- Total Number of Parking Spaces: 43
- Total Number of Accessible Parking Spaces: 3
- Total Number of Van Parking Spaces: 0

Major Issues Found:

- No van designated space
- At least one accessible space is missing a striped access aisle.
- The curb cuts at the crosswalk have been broken down



Photo 1



Photo 2



Photo 3

Veterans Memorial Rink Parking Lot

Facility Information

- Location: Somerville Avenue and Bleachery Court
- Ward: 2
- · Year Built: unknown
- Year Renovated: unknown

Approach & Entrance:

- Pedestrian Crosswalks & Curb Ramps: accessible
- Sidewalks: accessible, except for deteriorate surface at intersection of Somerville Avenue and Bleachery Court

Number of Parking Spaces:

- Total Number of Parking Spaces: 78
- Total Number of Accessible Parking Spaces: 4 (four are required)
- Total Number of Van Parking Spaces: 0 (at least one is required)

Major Issues Found:

- No van designated space is provided
- Sign identifying one parking space closest to Somerville Avenue is missing

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and General Site and Building Elements for Accessible Parking.



Photo 1



Photo 2



Photo 3

Winter Hill Parking A

Facility Information

- Location: Broadway This parking lot is sheltered from Broadway
- Ward: 4
- Year Built: unknown
- Year Renovated: unknown

Approach & Entrance:

- Pedestrian Crosswalks & Curb Ramps: accessible
- Sidewalks: accessible

Number of Parking Spaces:

- Total Number of Parking Spaces: 14
- Total Number of Accessible Parking Spaces: 2
- Total Number of Van Parking Spaces: 0

Major Issues Found:

- No van designated space is provided
- Cross slope at 3% or more in the accessible spaces.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and General Site and Building Elements for Accessible Parking.



Photo 1

Winter Hill Parking B

Facility Information

Location: Broadway

Ward: 4

Year Built: unknown

Year Renovated: unknown

Approach & Entrance:

 Pedestrian Crosswalks & Curb Ramps: accessible

· Sidewalks: accessible

Number of Parking Spaces:

Total Number of Parking Spaces: 123

 Total Number of Accessible Parking Spaces: 4

Total Number of Van Parking Spaces: 0

Major Issues Found:

- No van designated space is provided
- This large parking lot has four accessible parking spaces, but the labeling appears to be only on the ground surface, so they are difficult to discover. No signs are provided
- The cross slope at 3% or more for much of the lot

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements and General Site and Building Elements for Accessible Parking.



Signage and Wayfinding

Overview

Like many cities, Somerville has buildings and facilities that span nearly one hundred years and with the exception of four schools, most facilities have not been renovated in decades. As such, signage and wayfinding conditions vary from nearly non-existent to quite good. Depending on the building, Somerville has upgraded all, some or none of the interior signage. Where signage has been upgraded, it has often coincided with renovations to a particular building, floor or area.

This report outlines the existing site and building conditions and their impact on the current signage within Somerville facilities. The issues incorporate both architectural and graphic wayfinding elements. Combined, these elements are responsible for establishing a legible and comprehensible system for navigating all of Somerville's facilities.

Summary

Similar to other municipalities, the City of Somerville has many typical signage accessibility concerns including:

- 1. Accessible entrances are not identified.
- 2. Inaccessible entrances do not provide signage to accessible entrances.
- 3. Many buildings are missing room and door designation signage.
- 4. Existing signage is dated such that it lacks:
 - a. raised characters;
 - b. Braille;
 - c. compliant typography.
- 5. Existing signage is incorrectly mounted on walls, doors, and door frames.
- Signage at inaccessible restrooms and other amenities do not direct users to accessible amenities.
- 7. Some egress routes and fire exits are not identified.

At the following completely inaccessible buildings, exterior signage did not advise how to access the programs, services and activities contained within:

- 1. Cross Street Senior Center / Recreation.
- 2. DPW Building.
- 3. Recreation Building.
- 4. West Branch Library.

Identifying the accessible entrance at the High School can be problematic because the accessible entrance is hidden behind walls.

Additionally, while not required by accessibility regulations these other conditions were found:

- 1. Interior wayfinding signage may be missing.
- Interior wayfinding signage may be inappropriately sized and colored for the given location.
- Some exterior wayfinding maps, although well designed, are not located on accessible routes and do not provide accessible clear space in front of them.

In addition to interior sign best practices, there are specific signs that are required by ADA and/or State Building Codes. The following signs must be present and must comply with regulatory standards:

- 1. Exit, egress and emergency signs.
- 2. ADA facilities signs.
- 3. Building numbers and names including room designation signage.

Further, any signs used in new construction, alteration or replacement of signage after March 15, 2012 must comply with the 2010 ADA Standards. Any open contracts for signage should be amended to reflect an obligation to meet 2010 ADA Standards. Given these overall findings, the following should be undertaken by Somerville to ensure compliance:

- Ensure that accessible entrances and routes to accessible entrances are labeled.
- 2. Ensure all rooms and doors have designation signage.
- 3. Ensure room designation signage has raised characters and Braille.
- 4. Ensure room designation signage is mounted at sides of doors.
- 5. Ensure room designation signage is not covered by artwork or other objects.
- 6. Ensure signage at inaccessible restrooms direct users to accessible restrooms.
- 7. Ensure that egress routes and fire exits are signed appropriately.

While not required by accessibility code:

- Ensure that wayfinding signage is appropriately sized and provides contrast with surrounding surface and lighting conditions.
- Ensure that facility and floor maps are located on accessible routes and have approach space campus wide.
- 3. Remove walls and landscaping that hides accessible entrances.



Photo 1 – DPW Building



Photo 2 - City Hall



Photo 3 – SCAT Building

Issues

Inaccessible Buildings

Exterior signage does not advise how to access the programs, services and activities contained within the building. (Photo 1)

Signage Points to Inaccessible Entrances

The Recreation Building has International Symbol of Accessibility at one or more entrances yet the building has no accessible entrance. (Photo 6)

Accessible Entrances are not Identified

Locating accessible entrances can be problematic because signage is not provided at inaccessible entrances. (Photo 2, 3)

Accessible Entrances are Hidden

Landscaping and walls hide accessible entrances from adjacent walkways. (Photo 4)

Inaccessible Instructions at Accessible Entrances and Intercoms

Signage posted at accessible entrances and intercoms does not provide raised characters, Braille and compliant typography. (Photo 5)

Internal Wayfinding and You are Here Maps

Most complex buildings lack internal wayfinding and You Are Here maps to assist with internal navigation. This is a particular concern at larger complex facilities such as the High School. (Photo 7)

Legibility of Building or Destination Signage

Some signs mounted on walls or glass surfaces can be difficult to find or read. These signs have reduced visibility as a result of font sizes that are too small, poor color contrast between the signs and walls or glass, and a general lack of coordination with both direct lighting sources and indirect sources such as solar glare. (Photo 8)



Photo 4 - High School



Photo 5 - City Hall Annex



Photo 6 - Recreation Building

Room Designating Signage

Many buildings are missing room and door designation signage. (Photo 9)

Accessible signage is covered over. (Photo 10)

Existing signage is original to the building such that it lacks (Photo 11):

- a. raised characters,
- b. Braille,
- c. compliant typography.

Or existing signage is handwritten or damaged (Photo 12).

Mounting of Room Designating Signage

Much of the existing room designation signage in older facilities is incorrectly mounted on walls, doors, and door frames. (Photo 13)

Signage at Inaccessible Amenities

Signage at inaccessible restrooms and other amenities do not direct users to accessible amenities. (Photo 14)

Signage at Egress Routes and Fire Exits Some egress routes and fire exits are not

Some egress routes and fire exits are not identified by signage. (Photo 15)

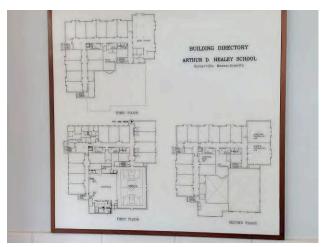


Photo 7 - Healey School



Photo 8 - Kennedy School



Photo 9 – SCAT Building

Recommendations

Accessible Entrances are not Identified Ensure that accessible entrances and routes to

accessible entrances are labeled.

Accessible Entrances are Hidden

Remove walls and landscaping that hides accessible entrances.

Legibility of Building or Destination Signage

The typeface must be clear, with maximum contrasting colors and sized appropriately to facilitate reading from significant distance. The surface of the sign should be well-lit and have a non-reflective or other non-glossy finish.

External Wayfinding and You are Here Maps

If Somerville invests in Wayfinding and You Are Here Maps, ensure that the maps are located on accessible routes and have approach space at maps of at least five feet.

Internal Wayfinding and You are Here Maps

Consider providing needed wayfinding signs and legible You-Are-Here maps at all appropriate decision-points inside each building, especially schools. At a minimum, adequate wayfinding signs should identify the location restrooms, elevators, and stairs.



Photo 10 – Healey School



Photo 11 – East Branch Library



Photo 12 - Healey School

Room Designating Signage

Install ADA-compliant signs alongside all doors to permanent rooms and spaces. In general, accessible signs must be mounted at the correct height on the latch side of the door and must have raised letters and numerals; use sans serif type and Braille. Typeface must be clear, with maximum contrasting colors. The surface of the sign should be well-lit and have a non-reflective or other non-glossy finish. Also, signs containing pictographs or Braille must never be mounted on any door. When a door is opened, it should not be capable of causing injury to a person who is reading the Braille on the other side.

Relocate artwork or paper signs covering room designating signage in schools.

Mounting of Room Designating Signage

For new construction, alteration or replacement of signage after March 15, ensure that tactile characters on signs shall be located 48 inches minimum above the finish floor or ground surface, measured from the baseline of the lowest tactile character and 60 inches.

Signage at Inaccessible Amenities

Confirm that all accessible restrooms are identified with tactile signs with the International Symbol of Accessibility. Where restrooms and amenities such as water fountains are not accessible, provide accessible signage directing users to the nearest accessible amenity.



Photo 13 – DPW Building



Photo 14 – City Hall



Photo 15 - High School

Signage at Egress Routes and Fire Exits Install tactile signs at all doors of egress stairs

and all exit doors leading to the exterior of the building. Any exit that is not on an accessible route, e.g., the exit doors with a step into the terrace, must have a sign clearly indicating the location of the accessible entrance/exit.

For additional information, please see Part E – ADA/MAAB References – Scoping Requirements for Communication Elements and Features for Signs.

PART F Appendices





City of XYZ

Grievance Procedure under the Americans with Disabilities Act

This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990. It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the City of XYZ. The City of XYZ's Personnel Policy governs employment-related complaints of disability discrimination.

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant and location, date, and description of the problem. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint, will be made available for persons with disabilities upon request.

The complaint should be submitted by the grievant and/or his/her designee as soon as possible but no later than sixty (60) calendar days after the alleged violation to:

ABC Deputy City Administrator, DEF Street, XYZ, ZZ, 0000 - 0000 Phone (111) 111-1111, ext ABC

Within fifteen (15) calendar days after receipt of the complaint, the ADA Coordinator or his designee will meet with the complainant to discuss the complaint and the possible resolutions. Within fifteen (15) calendar days of the meeting, the ADA Coordinator or his designee will respond in writing, and where appropriate, in format accessible to the complainant, such as large print, Braille,

or audio tape. The response will explain the position of the City of XYZ and offer options for substantive resolution of the complaint.

If the response by the ADA Coordinator or his designee does not satisfactorily resolve the issue, the complainant and/or his/her designee may appeal the decision within fifteen (15) calendar days after receipt of the response to the City Administrator or her designee.

Within fifteen (15) calendar days after receipt of the appeal, the City Administrator or her designee will meet with the complainant to discuss the complaint and possible resolutions. Within fifteen (15) calendar days after the meeting, the City Administrator or her designee will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

All written complaints received by the ADA Coordinator or his designee, appeals to the City Administrator or her designee, and responses from these two offices will be retained by the City of XYZ for at least (3) years.



City of XYZ Notice of Non-Discrimination

As required by Section 504 of the Rehabilitation Act, as amended, and the Americans with Disabilities Act (ADA), the City of XYZ has adopted by resolution a policy regarding "NON-DISCRIMINATION ON THE BASIS OF DISABILITY."

The City of XYZ does not discriminate on the basis of disability in the admission to, access to, or operation of programs, services or activities.

Qualified individuals who need accessible communication aids or services or other accommodations to participate in programs and activities are invited to make their needs and preferences known to the 504/ADA Coordinator. At least three to five days notice is requested so needs can be adequately met.

An internal grievance procedure is available to resolve complaints. Questions, concerns or requests for additional information regarding 504/ADA should be forwarded to:

ABC Deputy City Administrator, DEF Street, XYZ, ZZ, 0000 - 0000 Phone (111) 111-1111, ext ABC

Days and hours available: Monday – Friday 8:30 a.m. to 5 p.m.

Upon request, this notice is available in alternative forms (for example, large print or audio tape) from the 504/ADA Coordinator.



CITY OF XYZ'S POLICE DEPARTMENT'S POLICY STATEMENT REGARDING EFFECTIVE COMMUNICATION WITH PEOPLE WHO ARE DEAF OR HARD OF HEARING

OVERVIEW

It is the policy of this law enforcement agency (Agency) to ensure that a consistently high level of service is provided to all community members, including those who are deaf or hard of hearing. This Agency has specific legal obligations under the Americans with Disabilities Act and the Rehabilitation Act. To carry out these policies and legal obligations, the Agency instructs its officers and employees as follows:

- People who identify themselves as deaf or hard of hearing are entitled to a level of service equivalent to that provided others.
- The Agency will make every effort to ensure that its officers and employees communicate effectively with people who have identified themselves as deaf or hard of hearing.
- Effective communication with a person who is deaf or hard of hearing involved in an incident -- whether as a victim, witness, suspect, arrestee, or other persons connected to the situation -- is essential in ascertaining what actually occurred, the urgency of the matter, and the specifics of the situation.
- Various types of communication aids known as "auxiliary aids and services" are used to communicate with people who are deaf or hard of hearing. These include use of gestures or

visual aids to supplement oral communication; an exchange of written notes; use of a computer or typewriter; use of assistive listening devices (to amplify sound for persons who are hard of hearing); or use of qualified oral or sign language interpreters.

- The type of aid that will be required for effective communication will depend on the individual's usual method of communication, and the nature, importance, and duration of the communication at issue.
- In many circumstances, oral communication supplemented by gestures and visual aids, an exchange of written notes, use of a computer or typewriter, or use of an assistive listening device may be effective. In other circumstances, qualified sign language or oral interpreters are needed to communicate effectively with persons who are deaf or hard of hearing. The more lengthy, complex, and important the communication, the more likely it is that a qualified interpreter will be required for effective communication with a person whose primary means of communication is sign language or speech reading. For example:
- If there has been an incident and the officer is conducting witness interviews, a qualified sign language interpreter may be required to communicate effectively with someone whose primary means of communication is sign language.
- If a person is asking an officer for directions to a location, gestures and an exchange of written notes will likely be sufficient to communicate effectively and a sign language interpreter is often not required.
- To serve each individual effectively, primary consideration

should be given to the communication aid or service that works best for that person. Officers must ask persons who are deaf or hard of hearing what type of auxiliary aid or service they need. Officers must defer to those expressed choices, unless there is another equally effective way of communicating, given the circumstances, length, complexity, and importance of the communication, as well as the communication skills of the person who is deaf or hard of hearing.

- The Agency is not required to provide a particular auxiliary aid or service if doing so would fundamentally alter the nature of the law enforcement activity in question, or if it would cause an undue administrative or financial burden. Only the Agency head or his or her designee may make this determination.
- The input of people who are deaf or hard of hearing who are involved in incidents is just as important to the law enforcement process as the input of others. Officers must not draw conclusions about incidents unless they fully understand -- and are understood by -- all those involved, including persons who are deaf or hard of hearing.
- Auxiliary aids or services are to be provided free of charge.

ON-CALL INTERPRETER SERVICES

• The Agency will maintain a list of sign language and oral interpreting services that are available (on-call 24 hours per day) to provide qualified interpreters as needed. Each of these services will be chosen after having been screened for the quality and skill of its interpreters, its reliability, and other factors. The Agency will update this list annually.

• A qualified sign language or oral interpreter is one who is able to interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary. Accordingly, an interpreter must be able to sign to the deaf individual (or interpret orally to the person who does not use sign language) what is being said by the hearing person and to voice to the hearing person what is being signed or said by the deaf individual. The interpreter must be able to interpret in the language the deaf person uses (e.g., American Sign Language or Signed English) and must be familiar with law enforcement terms and phrases. Because a qualified interpreter must be able to interpret impartially, a family member, child, or friend of the individual who is deaf may not be qualified to render the necessary interpretation because of factors such as professional, emotional, or personal involvement, or considerations of confidentiality. Additionally, although a "qualified" interpreter may be certified, a certified interpreter is not necessarily "qualified," if he or she is not a good communications match for the deaf person (e.g., where the deaf person uses Signed English and the interpreter uses American Sign Language) or the situation (e.g., where the interpreter is unfamiliar with law enforcement vocabulary). Certification is not required in order for an interpreter to be "qualified."

TTY AND RELAY SERVICES

• In situations when a nondisabled person would have access to a telephone, officers must provide persons who are deaf or hard of hearing the opportunity to place calls using a text telephone (TTY, also known as a telecommunications device for deaf people, or TDD). Officers must also accept telephone calls placed by persons who are deaf or hard of hearing through the Telecommunications Relay Service.

TECHNIQUES FOR OFFICERS TO COMMUNICATE EFFECTIVELY

- Officers must review and have a working knowledge of <u>Guide</u> <u>for Law Enforcement Officers When In Contact With People Who Are Deaf or Hard of Hearing</u>. This document reviews how officers should communicate effectively in the types of situations officers will encounter. These situations include:
- Issuing a noncriminal or motor vehicle citation.
- Communicating with a person who initiates contact with an officer.
- Interviewing a victim or critical witness to an incident.
- Questioning a person who is a suspect in a crime.
- Making an arrest or taking a person into custody.
- Issuing *Miranda Warnings* to a person under arrest or in custody.
- Interrogating a person under arrest or in custody.

TYPES OF AUXILIARY AIDS AND SERVICES

- Officers must utilize the following auxiliary aids as appropriate, when available, to communicate effectively:
- Use of gestures
- Use of visual aids
- Exchange of written notes

- Use of computers
- Use of assistive listening devices
- Use of teletypewriters (TTY's)
- Use of qualified oral or sign language interpreters



SAMPLE DOJ POLICY REGARDING SERVICE ANIMALS FOR PEOPLE WITH DISABILITIES

XYZ is committed to making reasonable modifications to its policies, practices, and procedures to permit the use of service animals by its guests with disabilities. Service animals play an important role in ensuring the independence of people with disabilities, and it is therefore our policy to welcome any dog that is individually trained to assist a person with a disability.

What is a Service Animal?

Service animals are individually trained to work or perform tasks for individuals with disabilities. Service animals come in all dog breeds and sizes, may be trained either by an organization or by an individual with a disability, and are not required to be certified, licensed, or have any service animal papers or tags. Service animals do not always have a harness, a sign, or a symbol indicating that they are service animals. A service animal is not a pet. Service animals assist people with disabilities in many different ways, such as:

- Guiding people who are blind or have low vision and retrieving dropped objects for them;
- Alerting people who are deaf or hard of hearing to sounds and the presence of others;
- Carrying and picking up items, opening doors, or flipping switches for people with disabilities who have limited use of hands or arms, limited use of their legs, or limited ability to bend or stoop;
- Pulling wheelchairs;
- Alerting people with disabilities to the onset of seizures, protecting them and cushioning them if they fall, reviving them, and performing other tasks that reduce the risk of seizure-related injury;
- Doing work or performing tasks for persons with traumatic brain injury, intellectual
 disabilities, or psychiatric disabilities, such as reminding a person with depression to
 take medication or waking him up, alerting a person with anxiety to the onset of panic
 attacks, providing tactile stimulation to calm a person with post traumatic stress disorder,
 assisting people with schizophrenia to distinguish between hallucinations and reality,
 and helping people with traumatic brain injury to locate misplaced items, find places, or
 follow daily routines; and
- Providing physical support and assisting people with physical disabilities with stability and balance.

Employee Requirements with Regard to Service Animals:

Most of the time, people with disabilities who use service animals may be easily identified without any need for questioning. If you can tell by looking or if you know from prior contact with the person, you should not make the customer/guest feel unwelcome by asking questions. If you are unsure whether an animal meets the definition of a service animal, a XYZ reservationist or, where necessary, management may ask the guest the following questions:

- Is this a service animal required because of a disability?
- What work or tasks has the animal been trained to perform?

You may not ask a guest questions about his or her disability. You may not ask a guest to show certification or a special ID card as proof of his or her animal's training.

Once a customer/guest with a service animal has answered those initial questions, no employee may ask the customer/guest any further questions about his or her service animal. XYZ

employees may not restrict guests or visitors with service animals from areas of XYZ where all other guests and visitors are permitted.

In the event that a particular service animal is out of control and the animal's handler does not take effective action to control it, or if the animal is not housebroken, XYZ may ask the individual with a disability to remove the service animal from the premises or the XYZ vehicle at that time, but may not refuse service to that individual with a disability when he or she is not accompanied by that particular service animal. Barking or growling alone does not mean an animal is out of control. In circumstances where a service animal misbehaves or responds reasonably to a provocation or injury, XYZ must give the handler a reasonable opportunity to gain control of the animal and should take steps to prevent further provocation or injury. Finally, XYZ will not exclude a particular service animal based on past experience with other animals or based on fear that is not related to a service animal's actual behavior.

Questions/Inquiries/Complaints

Members of the public, guests, and employees can make complaints about the improper treatment of persons with service animals by calling [insert XYZ designated personnel at City Hall / Corporate Headquarters here, along with contact information]. Alternatively, they may also call the U.S. Department of Justice's ADA Information Line at 800-514-0301 (voice) or 800-514-0383 (TTY). People with disabilities have the right to be accompanied by service animals on both shared and exclusive trips under the Americans with Disabilities Act, and XYZ considers interference with or denial of this right to be a serious violation of its policy. XYZ will promptly investigate all complaints alleging a violation of this Policy and will take appropriate disciplinary action when employees fail to comply with this Policy.

PUBLIC NOTICE

XYZ welcomes all guests with disabilities, including individuals who are accompanied by service animals. Please direct any concerns to [insert name, title, address, telephone].

Information on the Americans with Disabilities Act (ADA) is available at www.ADA.gov, 1-800-514-0301 (voice), and 1-800-514-0383 (TTY).

ADA complaints may be filed with the U.S. Department of Justice by email at ADA.Complaint@usdoj.gov or by mail at:

Disability Rights (NYA) 950 Pennsylvania Avenue, NW Washington, D.C. 20530



SETTLEMENT AGREEMENT BETWEEN THE UNITED STATES OF AMERICA AND

THE CITY OF FORT MORGAN, COLORADO UNDER THE AMERICANS WITH DISABILITIES ACT

DJ 204-13-299

Press Release

I. BACKGROUND

A. SCOPE OF THE INVESTIGATION

The United States initiated this matter as a compliance review of the City of Fort Morgan, Colorado, under title II of the Americans with Disabilities Act of 1990 (ADA), 42 U.S.C. §§ 12131-12134, and the United States Department of Justice's implementing regulation, 28 C.F.R. Part 35. The City receives financial assistance from the Department of Justice, the review was also conducted under the authority of section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794, and the Department of Justice's implementing regulation, 28 C.F.R. Part 42, Subpart G.

The review was conducted by the Disability Rights Section of the Department of
Justice's Civil Rights Division and included reviewing the City's compliance with the following

title II requirements:

- to conduct a self-evaluation of its services, policies, and practices by July 26, 1992, and make modifications necessary to comply with the Department of Justice's title II regulation, 28 C.F.R. § 35.105;
- to notify applicants, participants, beneficiaries, and other interested people of their rights and the City's obligations under title II and the Department of Justice's regulation, 28 C.F.R. § 35.106;
- to designate a responsible employee to coordinate its efforts to comply with and carry out the City's ADA responsibilities, 28 C.F.R. § 35.107(a);
- to establish a grievance procedure for resolving complaints of violations of title II, 28
 C.F.R. § 35.107(b);
- to operate each program, service, or activity so that, when viewed in its entirety, it is readily accessible to and usable by individuals with disabilities, 28 C.F.R. §§ 35.149-.150, by:
 - delivery of services, programs, or activities in alternate ways, including, for
 example, redesign of equipment, reassignment of services, assignment of aides,
 home visits, or other methods of compliance or, if these methods are not effective in
 making the programs accessible;
 - physical changes to buildings (required to have been made by January 26, 1995), in accordance with the Department of Justice's title II regulation, 28 C.F.R. §§
 35.150-.151, and the 1991 ADA Standards for Accessible Design (1991 ADA Standards), 28 C.F.R. Part 36, App. D (2011) or the Uniform Federal Accessibility
 Standards (UFAS), 41 C.F.R. § 101-19.6, App. A, and the 2010 ADA Standards for

Accessible Design (2010 Standards), 28 C.F.R. § 35.104; [11]

- to ensure that facilities for which construction or alteration was begun after January 26, 1992, are readily accessible to and usable by people with disabilities, in accordance with 1) the Department of Justice's title II regulation and 2) the 1991 ADA Standards or UFAS, or the 2010 ADA Standards, as applicable, 28 C.F.R. § 35.151;
- to ensure that communications with people with disabilities, including applicants, participants, and members of the public, are as effective as communications with others, including furnishing auxiliary aids and services when necessary, 28 C.F.R. § 35.160;
- to provide direct access via TTY (text telephone) or computer-to-telephone emergency services, including 9–1–1 services, 28 C.F.R. § 35.162;
- to provide information for interested people with disabilities concerning the existence and location of the City's accessible services, activities, and facilities, 28 C.F.R. § 35.163(a); and
- to provide signage at all inaccessible entrances to any facility, directing users to an accessible entrance or to information about accessible facilities, 28 C.F.R. § 35.163(b).

The United States reviewed compliance with the ADA's new construction and alterations requirements at the following facilities constructed or altered after January 26, 1992: Animal Shelter, Optimist Park, Cemetery, City Complex, City Hall, Library and Museum, and Municipal Court and Police Department.

The program access review covered those of the City's programs, services, and activities that operate in the following facilities: Airport, City Park, Fulton Heights Park, Gateway Park, Jaycee Park, and Old Fort Park.

At the following facilities that are designated as emergency shelters, the United States reviewed areas of the facilities used by members of the public during an emergency, including the parking, the route from the parking area to the area used as a shelter, the area used as a shelter, and toilet facilities serving that area: Fort Morgan High School and Fort Morgan Middle School.

The United States reviewed the City's emergency management and disaster prevention policies and the City's sidewalk maintenance policies to evaluate whether people with disabilities have an equal opportunity to utilize these programs.

The United States reviewed the City's Police Department's policies and procedures regarding providing effective communication to people who are deaf or hard-of-hearing.

B. JURISDICTION

- 1. The ADA applies to the City because it is a "public entity" as defined by title II. 42 U.S.C. § 12131(1).
- 2. The United States is authorized under 28 C.F.R. Part 35, Subpart F, to determine the compliance of the City with title II of the ADA and the Department of Justice's title II implementing regulation, to issue findings, and, where appropriate, to negotiate and secure voluntary compliance agreements. Furthermore, the Attorney General is authorized, under 42 U.S.C. § 12133, to bring a civil action enforcing title II of the ADA.
- 3. The United States is authorized under 28 C.F.R. Part 42, Subpart G, to determine the City's compliance with section 504 of the Rehabilitation Act of 1973, to issue findings, and, where appropriate, to negotiate and secure voluntary compliance agreements. Furthermore, the Attorney General is authorized, under 29 U.S.C. § 794 and 28 C.F.R. §§ 42.530 and 42.108-110, to suspend or terminate financial assistance to the City provided

by the Department of Justice should the United States fail to secure voluntary compliance pursuant to Subpart G or should the United States bring a civil suit to enforce the rights of the United States under applicable federal, state, or local law.

- 4. The parties to this Agreement are the United States of America and the City of Fort Morgan, Colorado.
- 5. In order to avoid the burdens and expenses of a further investigation and possible litigation, the parties enter into this Agreement.
- 6. In consideration of, and consistent with, the terms of this Agreement, the Attorney General agrees to refrain from filing a civil suit in this matter regarding paragraphs 8 through 39, except as provided in the section entitled "Implementation and Enforcement."

II. ACTIONS TAKEN BY THE CITY OF FORT MORGAN

- 7. The City of Fort Morgan represents that it has taken actions to comply with the ADA and the Rehabilitation Act, including but not limited to the following:
 - a. The City of Fort Morgan, through its building department and building inspector, has always been cognizant of its responsibility to comply with the ADA and the Rehabilitation Act. As a City, it adopted the International Building Code (IBC) Chapter 11, regarding accessibility. As upgrades are made to its buildings/programs the City strives to comply with the requirements. In addition, the City's revised Zoning Code requires all sidewalks and off-street parking to be constructed in accordance with current ADA requirements.
 - b. As a result of the compliance audit, the City recognized areas wherein improvements to its policies, structures, and programs could be made. At the conclusion of the audit, the City immediately begin implementing these necessary

improvements.

c. The City of Fort Morgan strives to do its part to inform its citizens of their ADA rights and our obligations.

III. REMEDIAL ACTION

A. NOTIFICATION

- 8. Within two (2) months of the effective date of this Agreement, the City will adopt the attached Notice under the ADA, <u>Attachment A</u> ("Notice"); distribute it to all its agency heads; publish the Notice in a local newspaper of general circulation serving the City; post the Notice on its Internet Home Page; and post the Notice in conspicuous locations in its public buildings. It will refresh each posted Notice, and update the contact information contained on each Notice, as necessary, during the term of this Agreement. The Notice will be provided to any person upon request.
- 9. Within three (3) months of the effective date of this Agreement, and annually thereafter, the City will implement and send the United States its written procedures to inform interested people with disabilities of the existence and location of the City's accessible programs, services, and activities.

C. GRIEVANCE PROCEDURE

10. Within three (3) months of the effective date of this Agreement, the City will adopt the attached ADA Grievance Procedure, <u>Attachment B</u>, distribute it to all of its agencies, and post copies of it in conspicuous locations in each of its public buildings. It will refresh each posted copy, and update the contact information contained on it, as necessary, for the term of the Agreement. Copies will also be provided to any person upon request.

D. GENERAL EFFECTIVE COMMUNICATION PROVISIONS

- 11. Within three (3) months of the effective date of this Agreement, the City will identify sources of qualified sign language and oral interpreters, qualified readers, real-time transcription services, and vendors able to put documents in Braille. Within this time the City will implement and report to the United States its written procedures, with time frames, for fulfilling requests for sign language or oral interpreters, qualified readers, real-time transcription services, and documents in alternate formats, including Braille, large print, cassette tapes, accessible electronic format (e.g., HTML).
- 12. The City will ensure that all appropriate employees are trained and practiced in using the Colorado Relay Service to make and receive calls, and report to the United States the details of the trainings and employees trained.

E. LAW ENFORCEMENT AND EFFECTIVE COMMUNICATION

- 13. Within three (3) months of the effective date of this Agreement, the City will implement the City of Fort Morgan Police Department's Policy Statement on Effective Communication with People Who are Deaf or Hard of Hearing, <u>Attachment C</u>, and distribute to all police officers the Guide for Law Enforcement Officers When in Contact with People Who are Deaf or Hard of Hearing at <u>Attachment D</u>.
- 14. Within three (3) months of the effective date of this Agreement, the City will hire or contract with local qualified oral and sign language interpreters to be available twenty-four hours every day to its police department.
- 15. Within three (3) months of the effective date of this Agreement, the City will equip each police station and detention facility with a working TTY to enable people who are deaf, hard of hearing, or who have speech impairments to make telephone calls. Where

telephone calls are time-limited, the City will adopt policies permitting a longer period of time due to the slower nature of TTY communications as compared to voice communications.

F. EMPLOYMENT

- 16. Within three (3) months of the effective date of this Agreement, the City will amend its employment policies to comply with the U.S. Equal Employment Opportunity Commission regulations implementing title I of the Americans with Disabilities Act of 1990, codified at 29 C.F.R. Part 1630. The policies will provide at a minimum that the City:
 - will not discriminate on the basis of disability in its hiring or employment practices;
 - will not ask a job applicant about the existence, nature, or severity of a disability.
 Applicants may be asked about their ability to perform specific job functions.
 Medical examinations or inquiries may be made, but only after a conditional offer of employment is made and only if required of all applicants for the position;
 - upon request will make reasonable accommodations for a qualified applicant or employee with a disability unless the accommodation would cause an undue hardship on the operation of the City's business. If an applicant or an employee requests a reasonable accommodation and the individual's disability and need for the accommodation are not readily apparent or known, the City may ask for information necessary to determine whether the person has a disability-related need for the accommodation;
 - will confidentially maintain employee medical records separate from personnel files;
 and

will in making employment decisions individually assess whether a qualified person
with a disability meets selection criteria. To the extent the City's selection criteria
disqualify an individual because of disability then those criteria must be job-related
and consistent with business necessity.

G. EMERGENCY MANAGEMENT PROCEDURES AND POLICIES

- 17. The City's Emergency Operations Plan (EOP) must comply with the ADA. The City will use <u>Chapter 7</u> of the Department of Justice's *ADA Best Practices Tool Kit for State and Local Government (ADA Tool Kit)* to address ADA obligations of emergency management, including planning, preparedness, evacuation, shelters, medical and social services, lodging and housing programs, recovery, and rebuilding.
- 18. Within sixty (60) days of the effective date of this Agreement, the City will incorporate the provisions of <u>Chapter 7</u> of the *ADA Tool Kit* into its EOP and provide a copy (including supporting documents) to the United States.
- 19. The City's EOP will include the following:
 - a. procedures to receive and use input from people with a variety of disabilities on its emergency management plan (preparation, notification, response, and clean-up);
 - b. community evacuation plans to enable people who have mobility disabilities, are blind or have low vision, are deaf or hard of hearing, have cognitive disabilities, mental illness, or other disabilities to safely self-evacuate or be evacuated by others.
 - c. if its emergency warning system uses sirens or other audible alerts, then procedures to effectively inform people who are deaf or hard of hearing of an impending disaster.

- d. that emergency shelters have a back-up generator and a way to keep medications refrigerated (such as a refrigerator or a cooler with ice). Access to back-up power and refrigeration at such shelters will be made available to people whose disabilities require access to electricity and refrigeration, for example, for using life-sustaining medical devices, providing power to motorized wheelchairs, and preserving certain medications, such as insulin, that require refrigeration. The written procedures will include a plan for notifying people of the location of such shelters.
- e. procedures ensuring that people who use service animals are not separated from their service animals when sheltering during an emergency, even if pets are normally prohibited in shelters. The procedures will not segregate people who use service animals from others but may take into account the potential presence of people who, for safety or health reasons, should not be in contact with certain types of animals.
- f. plans for providing equivalent opportunities for accessible post-emergency temporary housing to people with disabilities. The City will ensure that information it makes available regarding temporary housing includes information on accessible housing (such as accessible hotel rooms within the community or in nearby communities) that could be used if people with disabilities cannot immediately return home after a disaster if, for instance, necessary accessible features such as ramps or electrical systems have been compromised.

H. PHYSICAL CHANGES TO EMERGENCY SHELTERS

20. Some City emergency shelters may be owned or operated by other public entities subject to title II or by public accommodations subject to title III and therefore they must provide program access or remove barriers to accessibility under the ADA. This Agreement does

not limit future enforcement action against the owners or operators of these emergency shelters.

- 21. Within one (1) month of the effective date of this Agreement, the City will request in writing that each of the owners and operators of the shelter facilities listed in Attachment G will remove the noted barriers to access for persons with disabilities. The request will specify that the remediation be completed within eighteen (18) months of the effective date of this Agreement. The City will simultaneously send a courtesy copy of the request to the United States.
- 22. Within eighteen (18) months of the effective date of this Agreement, the City will survey the shelters listed in <u>Attachment G</u> to determine whether the noted barriers have been removed. If not all barriers have been removed, the City will identify within twenty-four (24) months of the effective date of this Agreement an appropriate number of alternate accessible shelters using the survey instrument entitled ADA Checklist for Emergency Shelters, <u>Attachment N</u>.
- 23. Within three (3) months of the effective date of this Agreement and until all emergency shelters are accessible as confirmed by the City, the City will identify and widely publicize to the public and to people with disabilities the most accessible emergency shelters.

I. SIDEWALKS

- 24. Within three (3) months of the effective date of this Agreement, the City will implement and report to the United States its written process for requesting and receiving input from people with disabilities regarding the accessibility of its sidewalks, including requests to add curb cuts at particular locations.
- 25. Within three (3) months of the effective date of this Agreement, the City will identify and

report to the United States all streets, roads, and highways that have been constructed or altered since January 26, 1992. Paving, repaving, or resurfacing a street, road, or highway is considered an alteration for the purposes of this Agreement. Filling a pothole is not considered an alteration for the purposes of this Agreement. Within three (3) years of the effective date of this Agreement, the City will provide curb ramps or other sloped areas complying with the 2010 ADA Standards at all intersections of the streets, roads, and highways constructed or altered since January 26, 1992, having curbs or other barriers from a street level pedestrian walkway. Annually, the City will confirm to the United States that it has provided curb ramps or other sloped areas where required that are in compliance with the 2010 ADA Standards.

- 26. Beginning no later than three (3) months after the effective date of this Agreement, the City will provide curb ramps or other sloped areas complying with the 2010 ADA Standards at any intersection having curbs or other barriers to entry from a street level pedestrian walkway, whenever a new street, road, or highway is constructed or altered. Annually, the City will confirm to the United States that it has provided curb ramps or other sloped areas where required that are in compliance with the 2010 ADA Standards.
- 27. Within three (3) months of the effective date of this Agreement, the City will identify and report to the United States all street level pedestrian walkways that have been constructed or altered since January 26, 1992. Paving, repaving, or resurfacing a walkway is considered an alteration for the purposes of this Agreement. Within three (3) years of the effective date of this Agreement, the City will provide curb ramps or other sloped areas complying with the 2010 ADA Standards at all places where a street level pedestrian walkway constructed or altered since January 26, 1991, intersects with a street, road, or highway. Annually, the City will confirm to the United States that it has provided curb ramps or other sloped areas where required that are in compliance with the 2010 ADA

Standards.

28. Beginning no later than three (3) months after the effective date of this Agreement, the City will provide curb ramps or other sloped areas complying with the 2010 ADA Standards at all newly constructed or altered pedestrian walkways where they intersect a street, road, or highway. Annually, the City will confirm to the United States that it has provided curb ramps or other sloped areas where required that are in compliance with the 2010 ADA Standards.

J. WEB-BASED SERVICES AND PROGRAMS

- 29. Within one (1) month of the effective date of this Agreement, and annually thereafter, the City will distribute to its employees and contractors who design, develop, maintain, or otherwise have responsibility for its websites or third party websites used by the City, the technical assistance document, "Accessibility of State and Local Government Websites to People with Disabilities," Attachment H, also available at www.ada.gov/websites2.htm.
- 30. Within three (3) months of the effective date of this Agreement, and throughout the term of the Agreement, the City will do the following:
 - A. Post online a policy that its web pages will be accessible and create a process for making its web pages accessible;
 - B. Make all new and modified web pages and content accessible;
 - C. Make existing web content accessible;
 - D. Post a telephone number or e-mail address on its home page for visitors to request accessible information; and

E. At least annually, enlist people with disabilities to test its pages for ease of use.

K. NEW CONSTRUCTION, ALTERATIONS, AND PHYSICAL CHANGES TO FACILITIES

- 31. Any construction or alterations to City buildings and facilities by it or on its behalf will fully comply with the requirements of 28 C.F.R. § 35.151, including applicable architectural standards.
- 32. Any part of a City facility that does not comply with the 2010 ADA Standards (or the 1991 ADA Standards, as applicable), including those listed in Attachments I, J, K, and L, prevent people with disabilities from fully and equally enjoying the City's services, programs, or activities and constitute discrimination on the basis of disability within the meaning of 42 U.S.C. § 12132 and 28 C.F.R. §§ 35.149 and 35.150.
- 33. All architectural changes by the City or on its behalf made on or after March 15, 2012, must comply with the 2010 ADA Standards.
- 34. In the event that the City has already undertaken an alteration, addition, or other modification to any element identified in Attachments or otherwise in the City after January 26, 1992, and prior to the Effective Date of this Agreement, the City will submit, within six (6) months, a written report to the United States pursuant to paragraph 39 below summarizing the actions taken and providing evidence establishing each individual element's compliance with the applicable architectural standard as permitted by 28 C.F.R. § 35.151(c) and its Appendix, copied below:

Compliance Date for New Construction or Alterations	Applicable Standards

Before September 15, 2010	1991 ADA Standards or UFAS
On or after September 15, 2010, and before March 15, 2012	1991 ADA Standards, UFAS, or 2010 ADA Standards
On or after March 15, 2012	2010 ADA Standards

- 35. Within three (3) months of the effective date of this Agreement, the City will install signs identifying the accessible entrance and that comply with 28 C.F.R. § 35.163(b), after having surveyed all facilities that are the subject of this Agreement for the purpose of identifying those that have multiple entrances not all of which are accessible.
- 36. Newly Constructed Facilities: The City will take the actions listed in Attachments I and M to make the newly constructed parts of City facilities for which construction was commenced after January 26, 1992, readily accessible to and usable by people with disabilities.
- 37. <u>Altered Facilities</u>: The City will take the actions listed in Attachments <u>J</u> and <u>M</u> to make the altered parts of City facilities for which alterations commenced after January 26, 1992, readily accessible to and usable by people with disabilities.
- 38. Program Access in Existing Facilities: The City will take the actions listed in Attachments K and M to make each of the City's programs, services, and activities operating at a facility that is the subject of this Agreement, when viewed in its entirety, readily accessible to and usable by people with disabilities.
- 39. <u>Facilities and Programs Not Surveyed by the United States</u>: The City will review compliance with the requirements of title II of the ADA for those City facilities and programs that were not surveyed or reviewed by the United States. The the City will

survey the City's facilities for compliance with title II of the ADA that were not surveyed by the United States. Within twelve (12) months of the effective date of this Agreement, the City will submit to the United States a detailed report listing the access issues identified during the review together with the corrective actions and completion dates proposed to resolve such issues. The proposed completion dates may be no later than six (6) months prior to the termination of this Agreement. The survey conducted by the City, the access issues identified, and the corrective actions and completion dates proposed will be consistent with the requirements of title II of the ADA; the review of City facilities and programs conducted by the United States for purposes of this Agreement; and the access issues, corrective actions, and completion dates reflected in Attachments I, I, K, and M.

IV. MISCELLANEOUS PROVISIONS

- 40. Except as otherwise specified in this Agreement, six months after the effective date of this Agreement and annually thereafter until it expires, the City will submit written reports to the United States summarizing its actions pursuant to this Agreement. Reports will include reports with certifications from the Independent Licensed Architect, photographs showing measurements, architectural plans, notices published in the newspaper, copies of adopted policies, and proof of efforts to secure funding or assistance for structural renovations and equipment.
- 41. Throughout the term of this Agreement, consistent with 28 C.F.R. § 35.133(a), the City will maintain the accessibility of its programs, activities, services, facilities, and equipment, including routinely testing accessibility equipment and routinely auditing the accessibility of its programs and facilities. This provision, however, does not prohibit isolated or temporary interruptions in service or access due to maintenance or repairs. 28 C.F.R. § 35.133(b).

- 42. Within six (6) months of the effective date of this Agreement, the City will submit for preapproval by the United States a proposed day long training program on the requirements of the ADA and appropriate ways of serving people with disabilities. The submission will include a description of the training, the agenda, any handouts, and the name, title, and address of the trainer.
- 43. Within one (1) year of the effective date of this Agreement and annually thereafter, after approval of the training program by the United States, all City employees who have direct contact with members of the public will be trained for at least a half day on the requirements of the ADA and appropriate ways of serving people with disabilities. Within thirty (30) days after each training the City will submit the list of employees trained.

V. IMPLEMENTATION AND ENFORCEMENT

- 44. The City may seek to modify this Agreement because of changed conditions making performance impossible by notifying the United States in writing, setting forth the modification and the facts to support it. Until there is written Agreement by the United States to the modification, no modification will take effect. The United States' agreement will not be unreasonably withheld.
- 45. The United States may review compliance with this Agreement at any time. The City will cooperate with the United States. If the United States believes that the City has failed to comply with this Agreement, then the United States will notify the City in writing and it will attempt to resolve the non-compliance. If the United States is unable to resolve the non-compliance within 30 days, then it may institute a civil action in federal district court to enforce the terms of this Agreement and may take appropriate steps to enforce title II and section 504 of the Rehabilitation Act.
- 46. It is a violation of this Agreement for the City to fail to comply in a timely manner with

any of the requirements of this Agreement.

- 47. Failure by the United States to enforce any provision of this Agreement is not a waiver of the United States' right to enforce other provisions of this Agreement.
- 48. This Agreement is a public document. Upon request, a copy of this Agreement will be made available to any person by the City or the United States.
- 49. This Agreement is the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party will be enforceable. This Agreement does not remedy any other potential violations of the ADA or other federal law. This Agreement does not relieve the City of its continuing obligation to comply with all aspects of the ADA and section 504 of the Rehabilitation Act.
- 50. This Agreement will remain in effect for three (3) years.

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- 51. The person signing for the City represents that he or she is authorized to bind the City to this Agreement.
- 52. The effective date of this Agreement is the date of the last signature below.

FOR THE CITY:

FOR THE UNITED STATES:

JOCELYN SAMUELS, Acting Assistant Attorney General for

Civil Rights
EVE L. HILL,
Deputy Assistant Attorney General

REBECCA B. BOND, Chief KEVIN J. KIJEWSKI, Deputy Chief MELLIE NELSON, Supervisory Attorney

By: /s/ Terry L. McAlister By: /s/ Mary Lou Mobley

TERRY MCALISTER, Mayor

P.O. Box 100

Fort Morgan, CO 80701

Reviewed By City Attorney /s/ Jeffrey Wells

MARY LOU MOBLEY, Trial Attorney

EUGENIA ESCH, Trial Attorney

TERRY FULTON, Equal Opportunity

Specialist

Disability Rights Section - NYA

Civil Rights Division

U.S. Department of Justice

950 Pennsylvania Avenue, N.W.

Washington, DC 20530

(202) 307-0663

(202) 514-7821 (fax)

Date: 8/8/13 Date: 8/8/2013

Project Civic Access | ADA Home Page



PART E

ADA/MAAB References



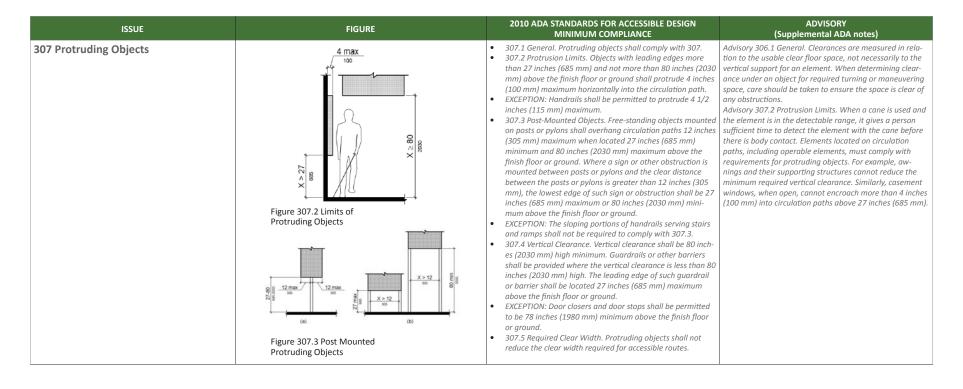
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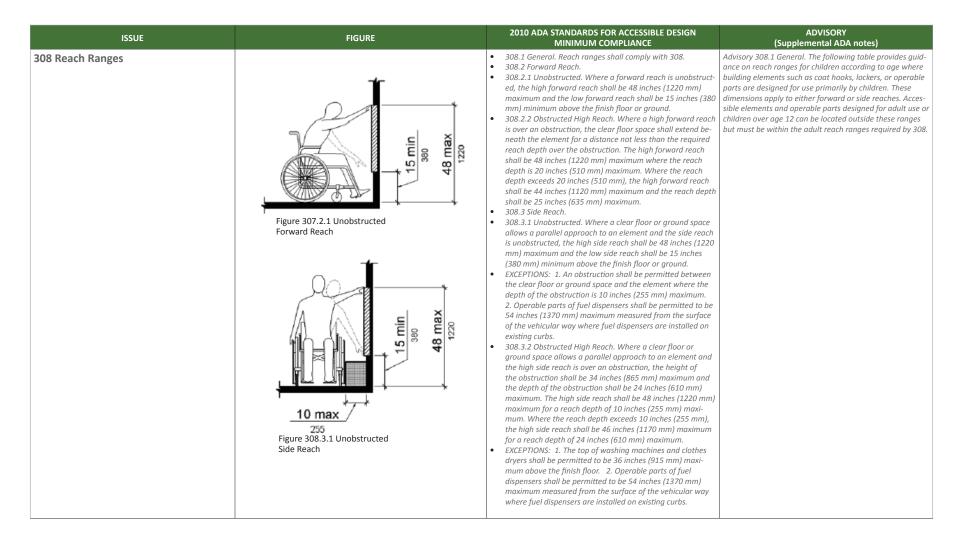
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ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN MINIMUM COMPLIANCE	ADVISORY (Supplemental ADA notes)
Chapter 3 Building Blocks			
302 Floor or Ground Surfaces		302.1 General. Floor and ground surfaces shall be stable, firm, and slip resistant and shall comply with 302. EXCEPTIONS: 1. Within animal containment areas, floor and ground surfaces shall not be required to be stable, firm, and slip resistant. 2. Areas of sport activity shall not be required to comply with 302. 302.3 Openings. Openings in floor or ground surfaces shall not allow passage of a sphere more than 1/2 inch (13 mm) diameter except as allowed in 407.4.3, 409.4.3, 410.4, 810.5.3 and 810.10. Elongated openings shall be placed so that the long dimension is perpendicular to the dominant direction of travel.	Advisory 302.1 General. A stable surface is one that remains unchanged by contaminants or applied force, so that when the contaminant or force is removed, the surface returns to its original condition. A firm surface resists deformation by either indentations or particles moving on its surface. A slip-resistant surface provides sufficient frictional counterforce to the forces exerted in walking to permit safe ambulation.
303 Changes in Level		 303.1 General. Where changes in level are permitted in floor or ground surfaces, they shall comply with 303 EXCEPTIONS: 1. Animal containment areas shall not be required to comply with 303. 2. Areas of sport activity shall not be required to comply with 303. 303.2 Vertical. Changes in level of 1/4 inch (6.4 mm) high maximum shall be permitted to be vertical. 303.3 Beveled. Changes in level between 1/4 inch (6.4 mm) high minimum and 1/2 inch (13 mm) high maximum shall be beveled with a slope not steeper than 1:2. 303.4 Ramps. Changes in level greater than 1/2 inch (13 mm) high shall be ramped, and shall comply with 405 or 406. 	Advisory 303.3 Beveled. A change in level of 1/2 inch (13 mm) is permitted to be 1/4 inch (6.4 mm) vertical plus 1/4 inch (6.4 mm) beveled. However, in no case may the combined change in level exceed 1/2 inch (13 mm). Changes in level exceeding 1/2 inch (13 mm) must comply with 405 (Ramps) or 406 (Curb Ramps).
304 Turning Space		304.1 General. Turning space shall comply with 304. 304.2 Floor or Ground Surfaces. Floor or ground surfaces of a turning space shall comply with 302. Changes in level are not permitted. EXCEPTION: Slopes not steeper than 1:48 shall be permitted.	Advisory 304.2 Floor or Ground Surface Exception. As used in this section, the phrase "changes in level" refers to surfaces with slopes and to surfaces with abrupt rise exceeding that permitted in Section 303.3. Such changes in level are prohibited in required clear floor and ground spaces, turning spaces, and in similar spaces where people using wheelchairs and other mobility devices must park their mobility aids such as in wheelchair spaces, or maneuver to use elements such as at doors, fixtures, and telephones. The exception permits slopes not steeper than 1:48.

ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN ADVISORY MINIMUM COMPLIANCE (Supplemental ADA notes)
304 Turning Space (cont.)		 304.3 Size. Turning space shall comply with 304.3.1 or 304.3.2. 304.3.1 Circular Space. The turning space shall be a space of 60 inches (1525 mm) diameter minimum. The space shall be permitted to include knee and toe clearance complying with 306. 304.3.2 T-Shaped Space. The turning space shall be a T-shaped space within a 60 inch (1525 mm) square minimum with arms and base 36 inches (915 mm) wide minimum. Each arm of the T shall be clear of obstructions 12 inches (305 mm) minimum in each direction and the base shall be clear of obstructions 24 inches (610 mm) minimum. The space shall be permitted to include knee and toe clearance complying with 306 only at the end of either the base or one arm. 304.4 Door Swing. Doors shall be permitted to swing into turning spaces.
305 Clear Floor or Ground Space	48 min 1220 Figure 305.3 Clear Floor and Ground Space	 305.1 General. Clear floor or ground space shall comply with 305. 305.2 Floor or Ground Surfaces. Floor or ground surfaces of a clear floor or ground space shall comply with 302. Changes in level are not permitted. EXCEPTION: Slopes not steeper than 1:48 shall be permitted. 305.3 Size. The clear floor or ground space shall be 30 inches (760 mm) minimum by 48 inches (1220 mm) minimum. 305.4 Knee and Toe Clearance. Unless otherwise specified, clear floor or ground space shall be permitted to include knee and toe clearance complying with 306. 305.5 Position. Unless otherwise specified, clear floor or ground space shall be positioned for either forward or parallel approach to an element. 305.6 Approach. One full unobstructed side of the clear floor or ground space shall adjoin an accessible route or adjoin another clear floor or ground space. 305.7 Maneuvering Clearance. Where a clear floor or ground space is located in an alcove or otherwise confined on all or part of three sides, additional maneuvering clearance shall be provided in accordance with 305.7.1 and 305.7.2. 305.7.1 Forward Approach. Alcoves shall be 36 inches (915 mm)wide minimum where the depth exceeds 24 inches (610 mm). 305.7.2 Parallel Approach. Alcoves shall be 60 inches (1525 mm) wide minimum where the depth exceeds 15 inches (380 mm).

ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN MINIMUM COMPLIANCE	ADVISORY (Supplemental ADA notes)
306 Knee and Toe Clearance	9 230 17-25 430-635 (a) (b) plan Figure 306.2 Toe Clearance	 306.1 General. Where space beneath an element is included as part of clear floor or ground space or turning space, the space shall comply with 306. Additional space shall not be prohibited beneath an element but shall not be considered as part of the clear floor or ground space or turning space. 306.2. Toe Clearance. 306.2.1 General. Space under an element between the finish floor or ground and 9 inches (230 mm) above the finish floor or ground shall be considered toe clearance and shall comply with 306.2. 306.2.2 Maximum Depth. Toe clearance shall extend 25 inches (635 mm) maximum under an element. 306.2.3 Minimum Required Depth. Where toe clearance is required at an element as part of a clear floor space, the toe clearance shall extend 17 inches (430 mm) minimum under the element. 306.2.4 Additional Clearance. Space extending greater than 6 inches (150 mm) beyond the available knee clearance at 9 inches (230 mm) above the finish floor or ground shall not be considered toe clearance. 306.2.5 Width. Toe clearance shall be 30 inches (760 mm) wide minimum. 306.3.1 General. Space under an element between 9 inches (230 mm) and 27 inches (685 mm) above the finish floor or ground shall be considered knee clearance and shall comply with 306.3. 306.3.2 Maximum Depth. Knee clearance shall extend 25 inches (635 mm) moximum under an element at 9 inches (230 mm) above the finish floor or ground. 306.3.3 Minimum Required Depth. Where knee clearance is required under an element as part of a clear floor space, the knee clearance shall be 11 inches (280 mm) deep minimum at 9 inches (230 mm) above the finish floor or ground, and 8 inches (205 mm) deep minimum at 27 inches (685 mm) above the finish floor or ground, the knee clearance shall be 11 inches (280 mm) deep minimum at 9 inches (230 mm) and 27 inches (685 mm) above the finish floor or ground, the knee clearance shall be permitted to reduce at a rate of 1 inch (25 mm) in depth for ea	





ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN MINIMUM COMPLIANCE	ADVISORY (Supplemental ADA notes)
309 Operable Parts		309.1 General. Operable parts shall comply with 309. 309.2 Clear Floor Space. A clear floor or ground space complying with 305 shall be provided. 309.3 Height. Operable parts shall be placed within one or more of the reach ranges specified in 308. 309.4 Operation. Operable parts shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. The force required to activate operable parts shall be 5 pounds (22.2 N) maximum. EXCEPTION: Gas pump nozzles shall not be required to provide operable parts that have an activating force of 5 pounds (22.2 N) maximum.	

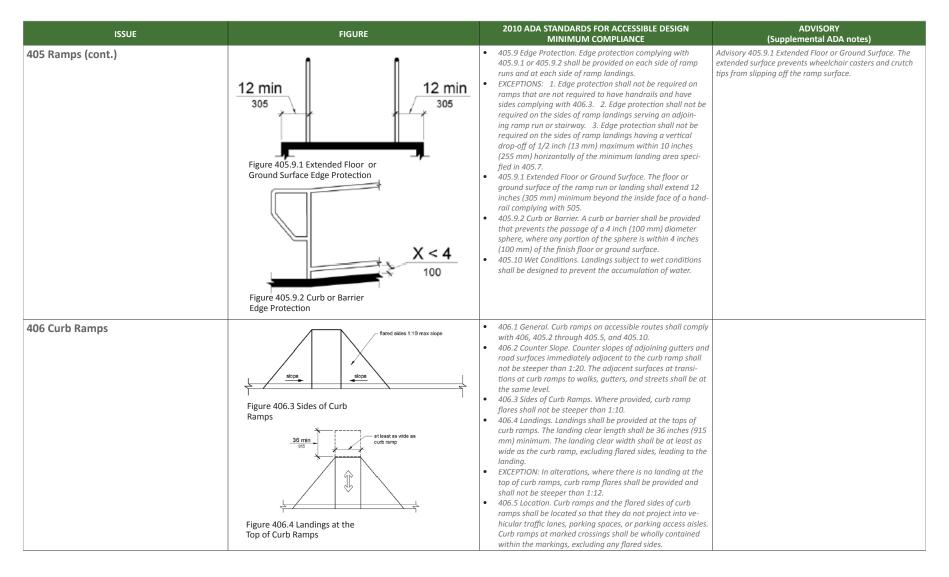
ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN MINIMUM COMPLIANCE	ADVISORY (Supplemental ADA notes)
Chapter 4 Accessible Routes			
402 Accesible Routes		 402.1 General. Accessible routes shall comply with 402. 402.2 Components. Accessible routes shall consist of one or more of the following components: walking surfaces with a running slope not steeper than 1:20, doorways, ramps, curb ramps excluding the flared sides, elevators, and platform lifts. All components of an accessible route shall comply with the applicable requirements of Chapter 4. 	Advisory 402.2 Components. Walking surfaces must have running slopes not steeper than 1:20, see 403.3. Other components of accessible routes, such as ramps (405) and curb ramps (406), are permitted to be more steeply sloped.
403 Walking Surfaces	24 max 610 48 min 1220 III 98 Figure 403.5.1 Clear Width of an Accessible Route	 403.1 General. Walking surfaces that are a part of an accessible route shall comply with 403. 403.2 Floor or Ground Surface. Floor or ground surfaces shall comply with 302. 403.3 Slope. The running slope of walking surfaces shall not be steeper than 1:20. The cross slope of walking surfaces shall not be steeper than 1:48. 2010 ADA Standards 405.5 Superceded by 2006 MAAB 22.3.1 Nowhere shall the cross slope of walkways exceed one-in-50 (1:50) (2%). (Refer to 521 CMR 2.4.4d.) Exception: Sidewalks on streets and ways shall be considered walkways, with the exception that if the slope of the natural topography exceeds one-in-20 (1:20) (5%) a ramp is not required. 403.4 Changes in Level. Changes in level shall comply with 303. 403.5 Clearances. Walking surfaces shall provide clearances complying with 403.5. EXCEPTION: Within employee work areas, clearances on common use circulation paths shall be permitted to be decreased by work area equipment provided that the decrease is essential to the function of the work being performed. 403.5.1 Clear Width. Except as provided in 403.5.2 and 403.5.3 (the clear width of walking surfaces shall be 36 inches (915 mm) minimum. 403.5.2 Clear Width at Turn. Where the accessible route makes a 180 degree turn around an element which is less than 48 inches (1220 mm) wide, clear width shall be 42 inches (1065 mm) minimum at the turn and 42 inches (1065 mm) minimum leaving the turn. EXCEPTION: Where the clear width at the turn is 60 inches (1525 mm) minimum compliance with 403.5.2 shall not be required. 	

ISSUE	FIGURE		2010 ADA STANDARDS FOR ACCESSIBLE DESIGN MINIMUM COMPLIANCE	ADVISORY (Supplemental ADA notes)
403 Walking Surfaces (cont.)			403.5.3 Passing Spaces. An accessible route with a clear width less than 60 inches (1525 mm) shall provide passing spaces at intervals of 200 feet (61 m) maximum. Passing spaces shall be either: a space 60 inches (1525 mm) minimum by 60 inches (1525 mm) minimum; or, an intersection of two walking surfaces providing a T-shaped space complying with 304.3.2 where the base and arms of the T-shaped space extend 48 inches (1220 mm) minimum beyond the intersection. 403.6 Handrails. Where handrails are provided along walking surfaces with running slopes not steeper than 1:20 they shall comply with 505.	Advisory 403.6 Handrails. Handrails provided in elevator cabs and platform lifts are not required to comply with the requirements for handrails on walking surfaces.
404 Doors, Doorways, and Gates	Figure 404.2.4.1 (a) Maneuvering Clearance at Manual Swinging Doors and Gates	•	an accessible route shall comply with 404. EXCEPTION: Doors, doorways, and gates designed to be operated only by security personnel shall not be required to comply with 404.2.7, 404.2.8, 404.2.9, 404.3.2 and 404.3.4 through 404.3.7 404.2.2 Double-Leaf Doors and Gates. At least one of the active leaves of doorways with two leaves shall comply with 404.2.3 and 404.2.4.	Advisory 404.1 General Exception. Security personnel must have sole control of doors that are eligible for the Exception at 404.1. It would not be acceptable for security personnel to operate the doors for people with disabilities while allowing others to have independent access. Advisory 404.2.4.3 Recessed Doors and Gates. A door can be recessed due to wall thickness or because of the placement of casework and other fixed elements adjacent to the doorway. This provision must be applied wherever doors are recessed.

obstruction within 18 intels (25 km) and pile teath side of a disconsive suprest; marker than 8 inches (25 km) played the process of the door, recessured from 18 inches (25 km) played the process of the door, recessured from 18 inches (25 km) played the process of the door, recessured from the process of	ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN MINIMUM COMPLIANCE	ADVISORY (Supplemental ADA notes)
404.2.6.2 Spring riniges. Door and gate spring riniges shall	404 Doors, Doorways, and Gates (cont.)		 ances for forward approach shall be provided when any obstruction within 18 inches (455 mm) of the latch side of a doorway projects more than 8 inches (205 mm) beyond the face of the door, measured perpendicular to the face of the door or gate. 404.2.4.4 Floor or Ground Surface. Floor or ground surface within required maneuvering clearances shall comply with 302. Changes in level are not permitted. EXCEPTIONS: 1. Slopes not steeper than 1:48 shall be permitted. 2. Changes in level at thresholds complying with 404.2.5 shall be permitted. 404.2.5 thresholds. Thresholds, if provided at doorways, shall be 1/2 inch (13 mm) high maximum. Raised thresholds and changes in level at doorways shall comply with 302 and 303. EXCEPTION: Existing or altered thresholds 3/4 inch (19 mm) high maximum that have a beveled edge on each side with a slope not steeper than 1:2 shall not be required to comply with 404.2.5. 404.2.6 Doors in Series and Gates in Series. The distance between two hinged or pivoted doors in series and gates in series shall be 48 inches (1220 mm) minimum plus the width of doors or gates swinging into the space. 404.2.7 Door and Gate Hardware. Handles, pulls, latches, locks, and other operable parts of such hardware shall be 34 inches (865 mm) minimum and 48 inches (1220 mm) maximum above the finish floor or ground. Where sliding doors are in the fully open position, operating hardware shall be exposed and usable from both sides. EXCEPTIONS: 1. Existing locks shall be permitted in any location at existing glazed doors without stiles, existing overhead rolling doors or grilles, and similar existing doors or grilles that are designed with locks that are activated only at the top or bottom rail. 2. Access gates in barrier walls and fences protecting pools, spas, and hot tubs shall be permitted to have operable parts of the release of latch on self-latching devices at 54 inches (1370 mm) maximum above the finish floor or ground provided the self-latching devices are not also self-locking devices and operated	ware that can be operated with a closed fist or a loose grip accommodates the greatest range of users. Hardware that requires simultaneous hand and finger movements require greater dexterity and coordination, and is not recom-

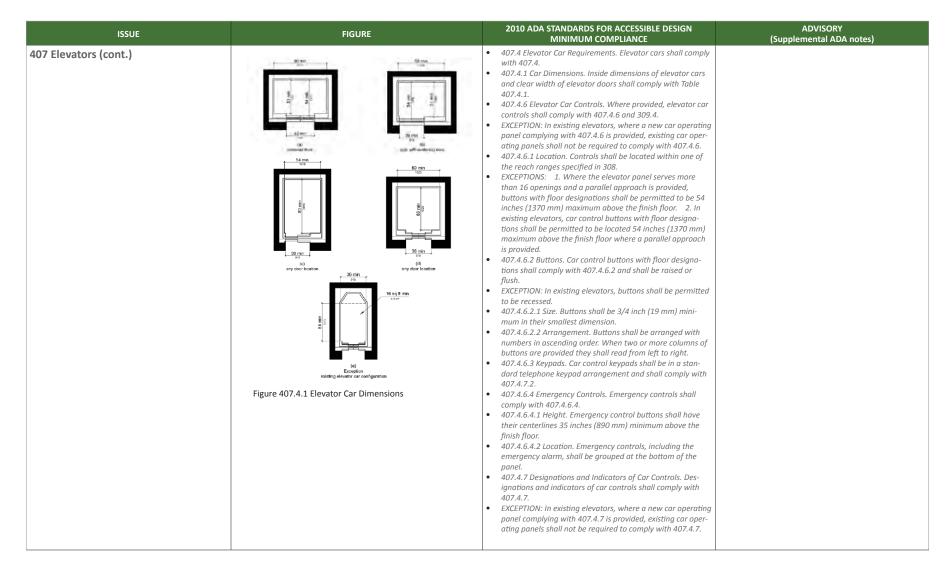
ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN MINIMUM COMPLIANCE	ADVISORY (Supplemental ADA notes)
404 Doors, Doorways, and Gates (cont.)		404.2.9 Door and Gate Opening Force. Fire doors shall have a minimum opening force allowable by the appropriate administrative authority. The force for pushing or pulling open a door or gate other than fire doors shall be as follows. 1. Interior hinged doors and gates: 5 pounds (22.2 N) maximum. 2. Sliding or folding doors: 5 pounds (22.2 N) maximum These forces do not apply to the force required to retract latch bolts or disengage other devices that hold the door or gate in a closed position. 404.2.10 Door and Gate Surfaces. Swinging door and gate surfaces within 10 inches (255 mm) of the finish floor or ground measured vertically shall have a smooth surface on the push side extending the full width of the door or gate. Parts creating horizontal or vertical joints in these surfaces shall be within 1/16 inch (1.6 mm) of the same plane as the other. Cavities created by added kick plates shall be capped. EXCEPTIONS: 1. Sliding doors shall not be required to comply with 404.2.10. 2. Tempered glass doors without stiles and having a bottom rail or shoe with the top leading edge tapered at 60 degrees minimum from the horizontal shall not be required to meet the 10 inch (255 mm) obttom smooth surface height requirement. 3. Doors and gates that do not extend to within 10 inches (255 mm) of the finish floor or ground shall not be required to comply with 404.2.10. 4. Existing doors and gates without smooth surface within 10 inches (255 mm) of the finish floor or ground shall not be required to comply with 404.2.10 provided that if added kick plates are installed, cavities created by such kick plates are capped 404.2.11 Vision Lights. Doors, gates, and side lights adjacent to doors or gates, containing one or more glazing panels that permit viewing through the panels shall have the bottom of at least one glazed panel located 43 inches (1090 mm) maximum above the finish floor. 404.3. Automatic and Power-Assisted Doors and Gates. Automatic doors and automatic gates shall comply with 404.3. Full-powered automatic doors	Advisory 404.2.9 Door and Gate Opening Force. The maximum force pertains to the continuous application of force necessary to fully open a door, not the initial force needed to overcome the inertia of the door. It does not apply to the force required to retract bolts or to disengage other devices used to keep the door in a closed position.

ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN MINIMUM COMPLIANCE	ADVISORY (Supplemental ADA notes)
405 Ramps	isnaing ramp run landing samp run Table as ramp run Figure 405.7 Ramp Landings	 405.1 General. Ramps on accessible routes shall comply with 405. EXCEPTION: In assembly areas, aisle ramps adjacent to seating and not serving elements required to be on an accessible route shall not be required to comply with 405. 405.2 Slope. Ramp runs shall have a running slope not steeper than 1:12. EXCEPTION: In existing sites, buildings, and facilities, ramps shall be permitted to have running slopes steeper than 1:12 complying with Table 405.2 where such slopes are necessary due to space limitations. 405.3 Cross Slope. Cross slope of ramp runs shall not be steeper than 1:48. 405.4 Floor or Ground Surfaces. Floor or ground surfaces of ramp runs shall comply with 302. Changes in level other than the running slope and cross slope are not permitted on ramp runs. 405.5 Clear Width. The clear width of a ramp run and, where handrails are provided, the clear width between handrails shall be 36 inches (915 mm) minimum. EXCEPTION: Within employee work areas, the required clear width of ramps that are a part of common use circulation paths shall be permitted to be decreased by work area equipment provided that the decrease is essential to the function of the work being performed. 2010 ADA Standards 405.5 Superceded by 2006 MAAB 24.3 The minimum clear width of a ramp shall be 48 inches (48" = 1219mm), measured between the railings. 405.6 Rise. The rise for any ramp run shall be 30 inches (760 mm) maximum. 405.7.1 Slope. Landings shall have landings at the top and the bottom of each ramp run. Landings shall comply with 405.7. 405.7.2 Width. The landing clear length shall be permitted. EXCEPTION: Slopes not steeper than 1:48 shall be permitted. EXCEPTION: Slopes not steeper than 1:48 shall be permitted. EXCEPTION: Slopes in the landing clear length shall be 60 inches (1525 mm) long minimum. 405.7.1 Change in Direction. Ramps that change direction between runs at landings shall	Advisory 405.2 Slope. To accommodate the widest range of users, provide ramps with the least possible running slope and, wherever possible, accompany ramps with stairs for use by those individuals for whom distance presents a greater barrier than steps, e.g., people with heart disease or limited stamina. Advisory 405.3 Cross Slope. Cross slope is the slope of the surface perpendicular to the direction of travel. Cross slope is measured the same way as slope is measured (i.e., the rise over the run). Advisory 405.7 Landings. Ramps that do not have level landings at changes in direction can create a compound slope that will not meet the requirements of this document. Circular or curved ramps continually change direction. Curvilinear ramps with small radii also can create compound cross slopes and cannot, by their nature, meet the requirements for accessible routes. A level landing is needed at the accessible door to permit maneuvering and simultaneously door operation.



ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN MINIMUM COMPLIANCE	ADVISORY (Supplemental ADA notes)
407 Elevators	Figure 407.2.3.1 Floor Designations on Jambs of Elevator Hoistway Entrances Figure 407.2.3.2 Car Designations on Jambs of Destination-Oriented Elevator Hoistway Entrances	 407.1 General. Elevators shall comply with 407 and with ASME A17.1 (incorporated by reference, see "Referenced Standards" in Chapter 1). They shall be passenger elevators as classified by ASME A17.1. Elevator operation shall be automatic. 407.2.1 Call Controls. Where elevator call buttons or keypads are provided, they shall comply with 407.2.1 and 309.4. Call buttons shall be raised or flush. EXCEPTION: Existing elevators shall be permitted to have recessed call buttons. 407.2.1.1 Height. Call buttons and keypads shall be located within one of the reach ranges specified in 308, measured to the centerline of the highest operable part. EXCEPTION: Existing call buttons and existing keypads shall be permitted to be located at 54 inches (1370 mm) maximum above the finish floor, measured to the centerline of the highest operable part. 407.2.1.2 Size. Call buttons shall be 3/4 inch (19 mm) minimum in the smallest dimension. EXCEPTION: Existing elevator call buttons shall not be required to comply with 407.2.1.2. 407.2.1.3 Clear Floor or Ground Space. A clear floor or ground space complying with 305 shall be provided at call controls. 407.2.1.4 Location. The call button that designates the up direction shall be located above the call button that designates the down direction. EXCEPTION: Destination-oriented elevators shall not be required to comply with 407.2.1.4. 407.2.1.5 Signals. Call buttons shall have visible signals to indicate when each call is registered and when each call is answered. EXCEPTIONS: 1. Destination-oriented elevators shall not be required to comply with 407.2.1.5. provided that visible and audible signals complying with 407.2.1.5 provided that visible and subjection as the required to comply with 407.2.1.5 provided that visible and audible signals complying with 407.2.1.5 provided that visible and standard telephone keypads are provided, keypads shall be in a standard telephone keypad arrang	Advisory 407.1 General. The ADA and other Federal civil rights laws require that accessible features be maintained in working order so that they are accessible to and usable by those people they are intended to benefit. Building owners should note that the ASME Safety Code for Elevators and Escalators requires routine maintenance and inspections. Isolated or temporary interruptions in service due to maintenance or repairs may be unavoidable; however, failure to take prompt action to effect repairs could constitute a violation of Federal laws and these requirements. Advisory 407.2.1.3 Clear Floor or Ground Space. The clear floor or ground space required at elevator call buttons must remain free of obstructions including ashtrays, plants, and other decorative elements that prevent wheel-chair users and others from reaching the call buttons. The height of the clear floor or ground space is considered to be a volume from the floor to 80 inches (2030 mm) above the floor. Recessed ashtrays should not be placed near elevator call buttons so that persons who are blind or visually impaired do not inadvertently contact them or their contents as they reach for the call buttons. Advisory 407.2.1.4 Location Exception. A destination-oriented elevator system provides lobby controls enabling passengers to select floor stops, lobby indicators designating the floors at which the car will stop. Responding cars are programmed for maximum efficiency by reducing the number of stops any passenger experiences.

ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN ADVISORY MINIMUM COMPLIANCE (Supplemental ADA notes)
407 Elevators (cont.)		 407.2.2 Hall Signals. Hall signals, including in-car signals, shall comply with 407.2.2. 407.2.2.1 Visible and Audible Signals. A visible and audible signal shall be provided at each hoistway entrance to indicate which car is answering a call and the car's direction of travel. Where in-car signals are provided, they shall be visible from the floor area adjacent to the hall call buttons. 407.2.2.2 Visible Signals. Visible signal fextures shall be centered at 72 inches (1830 mm) minimum above the finish floor or ground. The visible signal elements shall be 2 1/2 inches (64 mm) minimum measured along the vertical centerline of the element. Signals shall be visible from the floor area adjacent to the hall call button. EXCEPTIONS: 1. Destination-oriented elevators shall be permitted to have signals visible from the floor area adjacent to the holistway entrance. 2. Existing elevators shall not be required to comply with 407.2.2.2. 407.2.2.3 Audible Signals. Audible signals shall sound once for the up direction and twice for the down direction, or shall have verbal annunciators that indicate the direction of elevator car travel. Audible signals shall have a frequency of 3500 Hz maximum. Verbal annunciators shall have a frequency of 300 Hz minimum and 3000 Hz maximum. The audible signal and verbal annunciators shall be 10 dB minimum above ambient, but shall not exceed 80 dB, measured at the hall call button. EXCEPTIONS: 1. Destination-oriented elevators shall not be required to comply with 407.2.2.3 provided that the audible tone and verbal annunciators it is the same as those given at the call button. EXCEPTIONS: 1. Destination-oriented elevators shall not be required to comply with 407.2.3. Signal state of the hall call button. EXCEPTIONS: 1. Destination-oriented elevators shall be provided in both tottle characters shall be 2 inches (51 mm) high minimum. A tottle star shall be provided on both jambs of elevator shall be provided on both jambs of

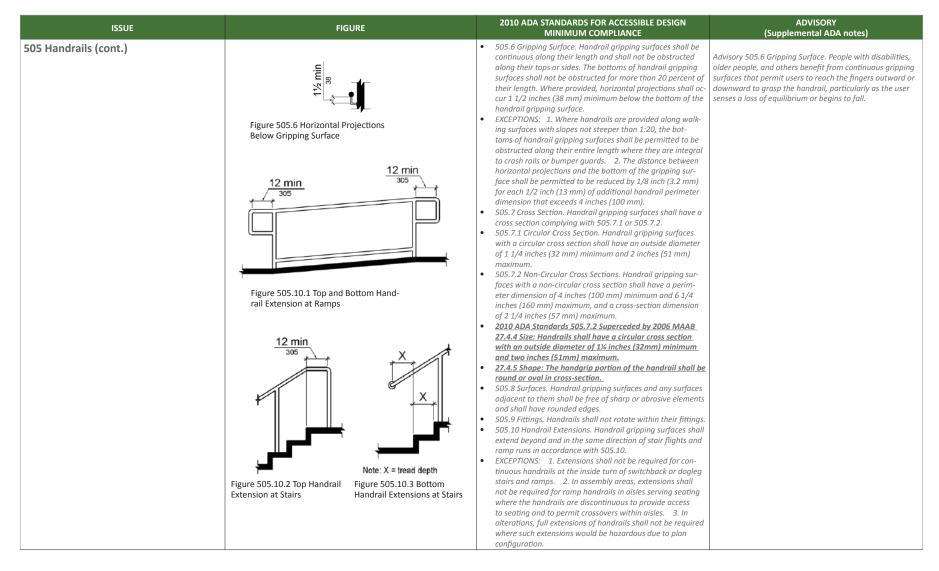


ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN MINIMUM COMPLIANCE	ADVISORY (Supplemental ADA notes)
407 Elevators (cont.)		 407.4.7.1 Buttons. Car control buttons shall comply with 407.4.7.1. 407.4.7.1.1 Type. Control buttons shall be identified by tactile characters complying with 703.2. 407.4.7.1.2 Location. Raised character and braille designations shall be placed immediately to the left of the control button to which the designations apply. EXCEPTION: Where space on an existing car operating panel precludes tactile markings to the left of the controls, markings shall be placed as near to the control as possible. 407.4.7.1.3 Symbols. The control button for the emergency stop, alarm, door open, door close, main entry floor, and phone, shall be identified with tactile symbols as shown in Table 407.4.7.1.3. 407.4.7.1.4 Visible Indicators. Buttons with floor designations shall be provided with visible indicators to show that a call has been registered. The visible indication shall extinguish when the car arrives at the designated floor. 407.4.7.2 Keypads. Keypads shall be identified by characters complying with 703.5 and shall be centered on the corresponding keypad button. The number five key shall have a single raised dot. The dot shall be 0.118 inch (3 mm) to 0.120 inch (3.05 mm) base diameter and in other aspects comply with Table 703.3.1. 	
410 Platform Lifts	Figure 410.6 Platform Lift Doors and Gates	 410.1 General. Platform lifts shall comply with ASME A18.1 (1999 edition or 2003 edition) (incorporated by reference, see "Referenced Standards" in Chapter 1). Platform lifts shall not be attendant-operated and shall provide unassisted entry and exit from the lift. 410.2 Floor Surfaces. Floor surfaces in platform lifts shall comply with 302 and 303. 410.3 Clear Floor Space. Clear floor space in platform lifts shall comply with 305. 410.4 Platform to Runway Clearance. The clearance between the platform sill and the edge of any runway landing shall be 1 inch (32 mm) maximum. 410.5 Operable Parts. Controls for platform lifts shall comply with 309. 410.6 Doors and Gates. Platform lifts shall have low-energy power-operated doors or gates complying with 404.3. Doors shall remain open for 20 seconds minimum. End doors and gates shall provide a clear width 32 inches (815 mm) minimum. Side doors and gates shall provide a clear width 42 inches (1065 mm) minimum. EXCEPTION: Platform lifts serving two landings maximum and having doors or gates on opposite sides shall be permitted to have self-closing manual doors or gates. 	Advisory 410.1 General. Inclined stairway chairlifts and inclined and vertical platform lifts are available for short-distance vertical transportation. Because an accessible route requires an 80 inch (2030 mm) vertical clearance, care should be taken in selecting lifts as they may not be equally suitable for use by people using wheelchairs and people standing. If a lift does not provide 80 inch (2030 mm) vertical clearance, it cannot be considered part of an accessible route in new construction. The ADA and other Federal civil rights laws require that accessible features be maintained in working order so that they are accessible to and usable by those people they are intended to benefit. Building owners are reminded that the ASME A18 Safety Standard for Platform Lifts and Stairway Chairlifts requires routine maintenance and inspections. Isolated or temporary interruptions in service due to maintenance or repairs may be unavoidable; however, failure to take prompt action to effect repairs could constitute a violation of Federal laws and these requirements.

ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN MINIMUM COMPLIANCE	ADVISORY (Supplemental ADA notes)
Chapter 5 General Site and Building Elements			
502 Parking Spaces	Figure 502.2 Vehicle Parking Spaces Figure 502.3 Parking Space Access Aisle	 502.1 General. Car and van parking spaces shall comply with 502. Where parking spaces are marked with lines, width measurements of parking spaces and access aisles shall be made from the centerline of the markings. EXCEPTION: Where parking spaces or access aisles are not adjacent to another parking space or access aisle, measurements shall be permitted to include the full width of the line defining the parking space or access aisle. 502.2 Vehicle Spaces. Car parking spaces shall be 96 inches (2440 mm) wide minimum and van parking spaces shall be 132 inches (3350 mm) wide minimum, shall be marked to define the width, and shall have an adjacent access aisle complying with 502.3. EXCEPTION: Van parking spaces shall be permitted to be 96 inches (2440 mm) wide minimum. 502.3 Access Aisle. Access aisles serving parking spaces shall comply with 502.3. Access aisles serving parking spaces shall comply with 502.3. Access aisles serving parking spaces shall comply with 502.3. Access aisles serving car and van parking spaces shall be 60 inches (1525 mm) wide minimum. 502.3.1 Width. Access aisles serving car and van parking spaces shall be 60 inches (1525 mm) wide minimum. 502.3.2 Length. Access aisles shall et marked so as to discourage parking in them. 502.3.3 Location. Access aisles shall be marked so as to discourage parking in them. 502.3.4 Location. Access aisles shall not overlap the vehicular way. Access aisles shall be permitted to be placed on either side of the parking space except for angled van parking spaces which shall have access aisles located on the passenger side of the parking spaces. 502.4 Floor or Ground Surfaces. Parking spaces and access aisles serving them shall comply with 302. Access aisles shall be at the same level as the parking spaces they serve. Changes in level are not permitted. 502.5 Vertical Clearance. Parking spaces for vans and access aisles and vehicular routes serving them shall provide	Advisory 502.3 Access Aisle. Accessible routes must connect parking spaces to accessible route must cross vehicular traffic lanes, marked crossings enhance pedestrian safety, particularly for people using wheelchairs and other mobility aids. Where possible, it is preferable that the accessible route not pass behind parked vehicles. Advisory 502.3.3 Marking. The method and color of marking are not specified by these requirements but may be addressed by State or local laws or regulations. Because these requirements permit the van access aisle to be as wide as a parking space, it is important that the aisle be clearly marked. Advisory 502.3.4 Location. Wheelchair lifts typically are installed on the passenger side of vans. Many drivers, especially those who operate vans, find it more difficult to back into parking spaces than to back out into comparatively unrestricted vehicular lanes. For this reason, where a van and car share an access aisle, consider locating the van space so that the access aisle is on the passenger side of the van space. Advisory 502.4 Floor or Ground Surfaces. Access aisles are required to be nearly level in all directions to provide a surface for wheelchair transfer to and from vehicles. The exception allows sufficient slope for drainage. Built-up curb ramps are not permitted to project into access aisles and parking spaces because they would create slopes greater than 1:48. Advisory 502.5 Vertical Clearance. Signs provided at entrances to parking facilities informing drivers of clearances and the location of van accessible parking spaces can provide useful customer assistance. Advisory 502.6 Identification. The required "van accessible" designation is intended to be informative, not restrictive, in identifying those spaces that are better suited for van use. Enforcement of motor vehicle laws, including parking privileges, is a local matter.

ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN ADVISORY MINIMUM COMPLIANCE (Supplemental ADA notes)	
502 Parking Spaces (cont.)		 502.7 Relationship to Accessible Routes. Parking spaces and access aisles shall be designed so that cars and vans, when parked, cannot obstruct the required clear width of adjacent accessible routes. Advisory 502.7 Relationship to Accessible Routes. When stops are an effective way to prevent vehicle overhang. from reducing the clear width of accessible routes. 	
503 Passenger Loading Zones	Figure 503.3 Passenger Loading Zone Access Aisle	 503.1 General. Passenger loading zones shall comply with 503. 503.2 Vehicle Pull-Up Space. Passenger loading zones shall provide a vehicular pull-up space 96 inches (2440 mm) wide minimum and 20 feet (6100 mm) long minimum. 503.3 Access Aisle. Passenger loading zones shall provide access aisles complying with 503 adjacent to the vehicle pull-up space. Access aisles shall adjoin an accessible route and shall not overlap the vehicular way. 503.3.1 Width. Access aisles serving vehicle pull-up spaces shall be 60 inches (1525 mm) wide minimum. 503.3.2 Length. Access aisles shall extend the full length of the vehicle pull-up spaces they serve. 503.3.3 Marking. Access aisles shall be marked so as to discourage parking in them. 503.4 Floor and Ground Surfaces. Vehicle pull-up spaces and access aisles serving them shall comply with 302. Access aisles shall be at the same level as the vehicle pull-up space they serve. Changes in level are not permitted. EXCEPTION: Slopes not steeper than 1:48 shall be permitted. 503.5 Vertical Clearance. Vehicle pull-up, spaces, access aisles serving them, and a vehicular route from an entrance to the passenger loading zone, and from the passenger loading zone to a vehicular exit shall provide a vertical clearance of 114 inches (2895 mm) minimum. 	

ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN MINIMUM COMPLIANCE	ADVISORY (Supplemental ADA notes)
504 Stairways	radius ½ max 13 (a) radius of tread edge (typical for all profiles) 1½ max 38 1½ max 38 1½ max 38 (b) angled riser (typical for all profiles) 1½ max 38 beveled nosing Figure 504.5 Stair Nosing	So4.1 General. Stairs shall comply with 504. So4.2 Treads and Risers. All steps on a flight of stairs shall have uniform riser heights and uniform tread depths. Risers shall be 4 inches (100 mm) high minimum and 7 inches (180 mm) high maximum. Treads shall be 11 inches (280 mm) deep minimum. So4.3 Open Risers. Open risers are not permitted. So4.4 Tread Surface. Stair treads shall comply with 302. Changes in level are not permitted. EXCEPTION: Treads shall be permitted to have a slope not steeper than 1:48. So4.5 Nosings. The radius of curvature at the leading edge of the tread shall be 1/2 inch (13 mm) maximum. Nosings that project beyond risers shall have the underside of the leading edge curved or beveled. Risers shall be permitted to slope under the tread at an angle of 30 degrees maximum from vertical. The permitted projection of the nosing shall extend 1 1/2 inches (38 mm) maximum over the tread below. So4.6 Handrails. Stairs shall have handrails complying with 505.	Advisory 504.4 Tread Surface. Consider providing visual contrast on tread nosings, or at the leading edges of treads without nosings, so that stair treads are more visible for people with low vision.
505 Handrails	(a) (b) walking surfaces Figure 505.4 Handrail Height Figure 505.5 Handrail Clearance	 505.1 General. Handrails provided along walking surfaces complying with 403, required at ramps complying with 405, and required at stairs complying with 504 shall comply with 505. 505.2 Where Required. Handrails shall be provided on both sides of stairs and ramps. EXCEPTION: In assembly areas, handrails shall not be required on both sides of aisle ramps where a handrail is provided at either side or within the aisle width. 505.3 Continuity. Handrails shall be continuous within the full length of each stair flight or ramp run. Inside handrails on switchback or dogleg stairs and ramps shall be continuous between flights or runs. 505.4 Height. Top of gripping surfaces of handrails shall be 34 inches (865 mm) minimum and 38 inches (965 mm) maximum vertically above walking surfaces, stair nosings, and ramp surfaces. Handrails shall be at a consistent height above walking surfaces, stair nosings, and ramp surfaces. 505.5 Clearance. Clearance between handrail gripping surfaces and adjacent surfaces shall be 1 1/2 inches (38 mm) minimum. 	Advisory 505.1 General. Handrails are required on ramp runs with a rise greater than 6 inches (150 mm) (see 405.8) and on certain stairways (see 504). Handrails are not required on walking surfaces with running slopes less than 1:20. However, handrails are required to comply with 505 when they are provided on walking surfaces with running slopes less than 1:20 (see 403.6). Sections 505.2, 505.3, and 505.10 do not apply to handrails provided on walking surfaces with running slopes less than 1:20 os these sections only reference requirements for ramps and stairs. Advisory 505.4 Height. The requirements for stair and ramp handrails in this document are for adults. When children are the principal users in a building or facility (e.g., elementary schools), a second set of handrails at an appropriate height can assist them and aid in preventing accidents. A maximum height of 28 inches (710 mm) measured to the top of the gripping surface from the ramp surface or stair nosing is recommended for handrails designed for children. Sufficient vertical clearance between upper and lower handrails, 9 inches (230 mm) minimum, should be provided to help prevent entrapment.

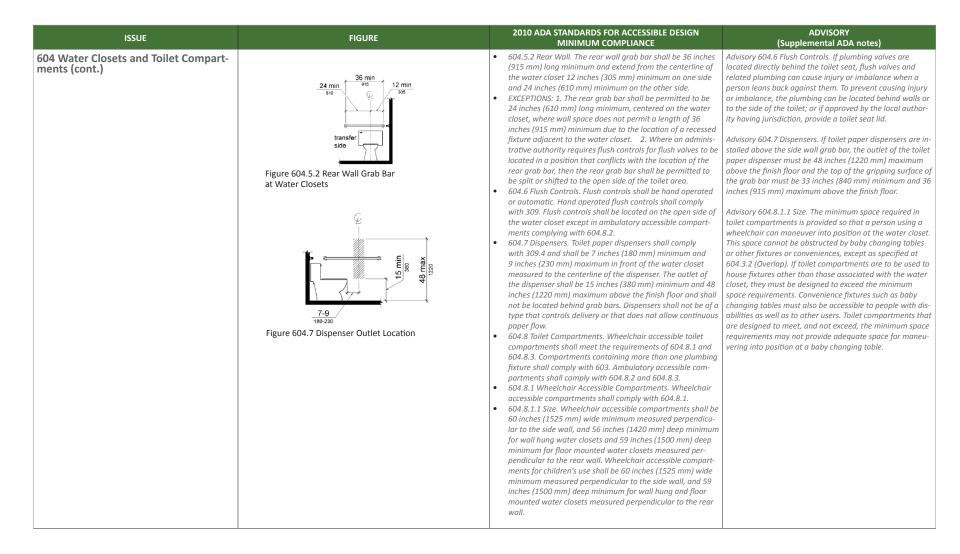


ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN MINIMUM COMPLIANCE	ADVISORY (Supplemental ADA notes)
505 Handrails (cont.)		 505.10.1 Top and Bottom Extension at Ramps. Ramp handrails shall extend horizontally above the landing for 12 inches (305 mm) minimum beyond the top and bottom of ramp runs. Extensions shall return to a wall, guard, or the landing surface, or shall be continuous to the handrail of an adjacent ramp run. 505.10.2 Top Extension at Stairs. At the top of a stair flight, handrails shall extend horizontally above the landing for 12 inches (305 mm) minimum beginning directly above the first riser nosing. Extensions shall return to a wall, guard, or the landing surface, or shall be continuous to the handrail of an adjacent stair flight. 505.10.3 Bottom Extension at Stairs. At the bottom of a stair flight, handrails shall extend at the slope of the stair flight for a horizontal distance at least equal to one tread depth beyond the last riser nosing. Extension shall return to a wall, guard, or the landing surface, or shall be continuous to the handrail of an adjacent stair flight. 	

ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN MINIMUM COMPLIANCE	ADVISORY (Supplemental ADA notes)
Chapter 6 Plumbing Elements and Facilities			
602 Drinking Fountains	Figure 602.5 Drinking Fountain Spout Location	 602.1 General. Drinking fountains shall comply with 307 and 602. 602.2 Clear Floor Space. Units shall have a clear floor or ground space complying with 305 positioned for a forward approach and centered on the unit. Knee and toe clearance complying with 306 shall be provided. EXCEPTION: A parallel approach complying with 305 shall be permitted at units for children's use where the spout is 30 inches (760 mm) maximum above the finish floor or ground and is 3 1/2 inches (90 mm) maximum from the front edge of the unit, including bumpers. 602.3 Operable Parts. Operable parts shall comply with 309. 602.4 Spout Height. Spout outlets shall be 36 inches (915 mm) maximum above the finish floor or ground. 602.5 Spout Location. The spout shall be located 15 inches (380 mm) minimum from the vertical support and 5 inches (125 mm) maximum from the front edge of the unit, including bumpers. 602.6 Water Flow. The spout shall provide a flow of water 4 inches (100 mm) high minimum and shall be located 5 inches (125 mm) maximum from the front of the unit. The angle of the water stream shall be measured horizontally relative to the front face of the unit. Where spouts are located less than 3 inches (75 mm) of the front of the unit, the angle of the water stream shall be 30 degrees maximum. Where spouts are located between 3 inches (75 mm) and 5 inches (125 mm) maximum from the front of the unit, the angle of the water stream shall be 15 degrees maximum. 602.7 Drinking Fountains for Standing Persons. Spout outlets of drinking fountains for standing persons shall be 38 inches (965 mm) minimum and 43 inches (1090 mm) maximum above the finish floor or ground. 2006 MAAB 36.1 - Drinking fountain shall include water coolers. 2006 MAAB 36.1.1 - A single drinking fountain may be installed by the use of a "high-low" fountain. (see LOCATION36a) ADAAG 4.1.3(10 & 4.15) Where only one drinking fountain is provided, it shall be accessible to persons using a	Advisory 602.6 Water Flow. The purpose of requiring the drinking fountain spout to produce a flow of water 4 inches (100 mm) high minimum is so that a cup can be inserted under the flow of water to provide a drink of water for an individual who, because of a disability, would otherwise be incapable of using the drinking fountain.

ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN MINIMUM COMPLIANCE	ADVISORY (Supplemental ADA notes)
603 Toilet and Bathing Rooms	Figure 603.3 Mirrors	 603.1 General. Toilet and bathing rooms shall comply with 603. 603.2 Clearances. Clearances shall comply with 603.2. 603.2.1 Turning Space. Turning space complying with 304 shall be provided within the room. 603.2.2 Overlap. Required clear floor spaces, clearance at fixtures, and turning space shall be permitted to overlap. 603.2.3 Door Swing. Doors shall not swing into the clear floor space or clearance required for any fixture. Doors shall be permitted to swing into the required turning space. EXCEPTIONS: 1. Doors to a toilet room or bathing room for a single occupant accessed only through a private office and not for common use or public use shall be permitted to swing into the clear floor space or clearance provided the swing of the door can be reversed to comply with 603.2.3. 2. Where the toilet room or bathing room is for individual use and a clear floor space complying with 305.3 is provided within the room beyond the arc of the door swing, doors shall be permitted to swing into the clear floor space or clearance required for any fixture. 603.3 Mirrors. Mirrors located above lavatories or countertops shall be installed with the bottom edge of the reflecting surface 40 inches (1015 mm) maximum above the finish floor or ground. Mirrors not located above lavatories or countertops shall be installed with the bottom edge of the reflecting surface 35 inches (890 mm) maximum above the finish floor or ground. 603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor. 	Advisory 603.2.3 Door Swing Exception 1. At the time the door is installed, and if the door swing is reversed in the future, the door must meet all the requirements specified in 404. Additionally, the door swing cannot reduce the required width of an accessible route. Also, avoid violating other building or life safety codes when the door swing is reversed. Advisory 603.3 Mirrors. A single full-length mirror can accommodate a greater number of people, including children. In order for mirrors to be usable by people who are ambulatory and people who use wheelchairs, the top edge of mirrors should be 74 inches (1880 mm) minimum from the floor or ground.

ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN MINIMUM COMPLIANCE	ADVISORY (Supplemental ADA notes)
604 Water Closets and Toilet Compartments	Figure 604.3.1 Side Wall Grab Bar at Water Closets	 604.1 General. Water closets and toilet compartments shall comply with 604.2 through 604.8. EXCEPTION: Water closets and toilet compartments for children's use shall be permitted to comply with 604.9. 604.2 Location. The water closet shall be positioned with a wall or partition to the rear and to one side. The centerline of the water closet shall be 16 inches (405 mm) minimum to 18 inches (455 mm) maximum from the side wall or partition, except that the water closet shall be 17 inches (430 mm) minimum and 19 inches (485 mm) maximum from the side wall or partition in the ambulatory accessible toilet compartment specified in 604.8.2. Water closets shall be arranged for a left-hand or right-hand approach. 604.3 Clearance. Clearances around water closets and in toilet compartments shall comply with 604.3. 604.3.1 Size. Clearance around a water closets shall be 60 inches (1525 mm) minimum measured perpendicular from the side wall and 56 inches (1420 mm) minimum measured perpendicular from the rear wall. 2010 ADA Standards 604.3.1 Superceded by 2006 MAAB 30.6.1 requirement: Standard Accessible Toilet Stall: Standard accessible toilet stall shall be at least 60 inches (60" = 1524mm) wide and 72 inches (72" = 1829mm) deep. 604.5 Grab Bars. Grab bars for water closets shall comply with 609. Grab bars shall be provided on the side wall closest to the water closet and on the rear wall. EXCEPTIONS: 1. Grab bars shall not be required to be installed in a toilet room for a single occupant accessed only through a private office and not for common use or public use provided that reinforcement has been installed in walls and located so as to permit the installation of grab bars complying with 604.5. 2. In residential dwelling units, grab bars shall not be required to be installed in housing or holding cells that are specially designed without protrusions for purposes of suicide prevention. 604.5.1 Side Wall. The side wall grab bar shall be 42 inche	Advisory 604.3.2 Overlap. When the door to the toilet room is placed directly in front of the water closet, the water closet cannot overlap the required maneuvering clearance for the door inside the room. Advisory 604.5 Grab Bars Exception 2. Reinforcement must be sufficient to permit the installation of rear and side wall grab bars that fully meet all accessibility requirements including, but not limited to, required length, installation height, and structural strength.

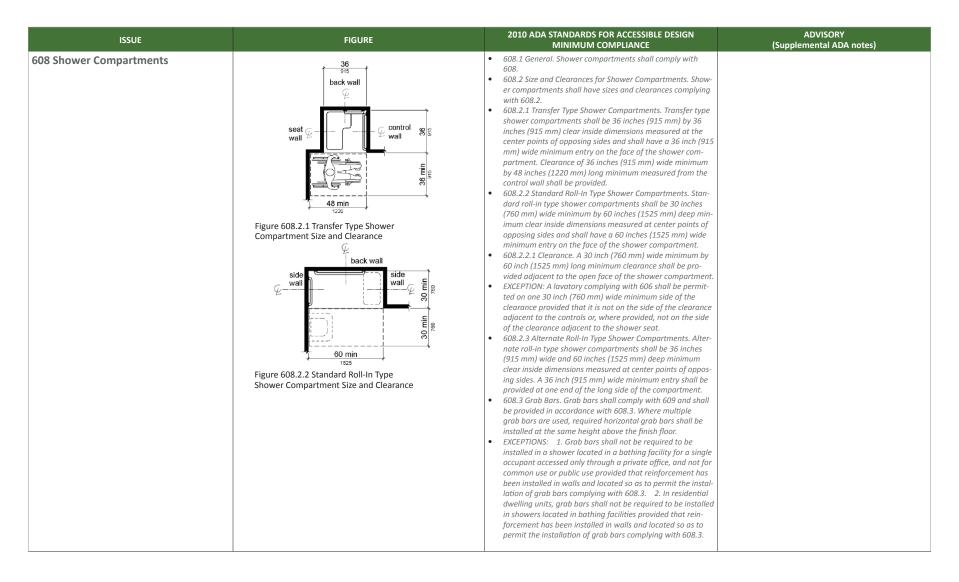


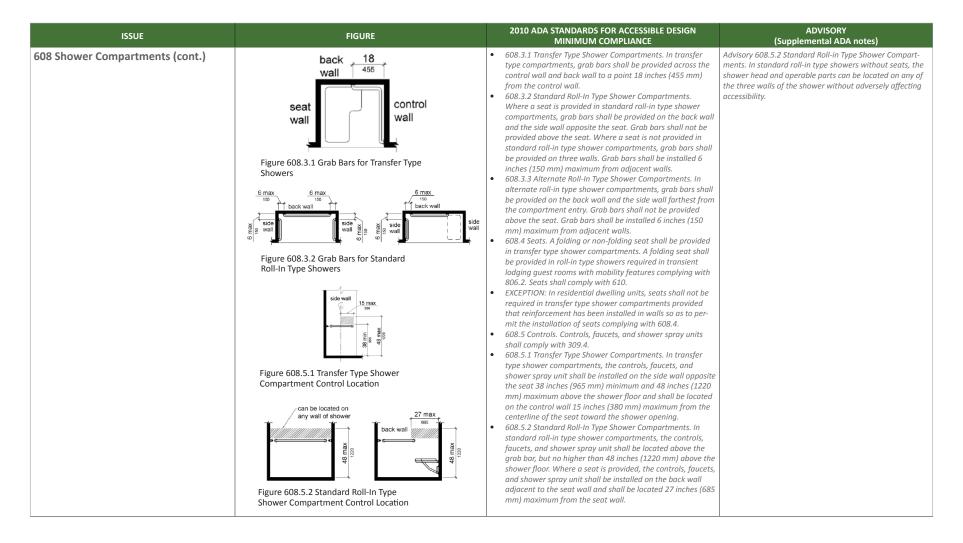
ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN MINIMUM COMPLIANCE	ADVISORY (Supplemental ADA notes)
604 Water Closets and Toilet Compartments (cont.)		 604.8.1.2 Doors. Toilet compartment doors, including door hardware, shall comply with 404 except that if the approach is to the latch side of the compartment door, clearance between the door side of the compartment and any obstruction shall be 42 inches (1065 mm) minimum. Doors shall be located in the front partition or in the side wall or partition farthest from the water closet. Where located in the front partition, the door opening shall be 4 inches (100 mm) maximum from the side wall or partition farthest from the water closet. Where located in the side wall or partition, the door opening shall be 4 inches (100 mm) maximum from the front partition. The door shall be self-closing. A door pull complying with 404.2.7 shall be placed on both sides of the door near the latch. Toilet compartment doors shall not swing into the minimum required compartment area. 604.8.1.3 Approach. Compartments shall be arranged for left-hand or right-hand approach to the water closet. 604.8.1.4 Toe Clearance. The front partition and at least one side partition shall provide a toe clearance of 9 inches (230 mm) minimum above the finish floor and 6 inches (150 mm) deep minimum beyond the compartment-side face of the partition, exclusive of partition support members. Compartments for children's use shall provide a toe clearance of 12 inches (305 mm) minimum above the finish floor. EXCEPTION: Toe clearance at the front partition is not required in a compartment greater than 62 inches (1650 mm) deep with a wall-hung water closet. Toe clearance at the front partition is not required in a compartment greater than 66 inches (1675 mm) wide. Toe clearance at the front partition is not required in a compartment greater than 66 inches (1675 mm) deep. 604.8.1.5 Grab Bars. Grab bars shall comply with 604.5.2 shall be provided. 604.8.2 Ambulatory Accessible Compartments. Ambulatory accessible compartments shall have a depth of 60 inches (1525 mm) minimum and a widthof 35 inches (890 mm) minim	

ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN MINIMUM COMPLIANCE	ADVISORY (Supplemental ADA notes)
604 Water Closets and Toilet Compartments (cont.)		 604.8.2.2 Doors. Toilet compartment doors, including door hardware, shall comply with 404, except that if the approach is to the latch side of the compartment door, clearance between the door side of the compartment and any obstruction shall be 42 inches (1065 mm) minimum. The door shall be self-closing. A door pull complying with 404.2.7 shall be placed on both sides of the door near the latch. Toilet compartment doors shall not swing into the minimum required compartment area. 604.8.2.3 Grab Bars. Grab bars shall comply with 609. A side-wall grab bar complying with 604.5.1 shall be provided on both sides of the compartment. 604.8.3 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor. 604.9 Water Closets and Toilet Compartments for Children's Use. Water closets and toilet compartments for Children's use shall comply with 604.9. 604.9.1 Location. The water closet shall be located with a wall or partition to the rear and to one side. The centerline of the water closet shall be 12 inches (305 mm) minimum and 18 inches (455 mm) maximum from the side wall or partition, except that the water closet shall be 17 inches (430 mm) minimum and 19 inches (485 mm) maximum from the side wall or partition in the ambulatory accessible toilet compartment specified in 604.8.2. Compartments shall be arranged for left-hand or right-hand approach to the water closet. 604.9.2 Clearance. Clearance around a water closet shall comply with 604.3. 604.9.3 Height. The height of water closets shall be 11 inches (280 mm) minimum and 17 inches (430 mm) maximum measured to the top of the seat. Seats shall not be sprung to return to a lifted position. 604.9.4 Grab Bars. Grab bars for water closets shall comply with 309.2 and 309.4 and shall be installed 36 inches (915 mm) maximum above the finish floor. Flush controls	

ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN ADVISORY MINIMUM COMPLIANCE (Supplemental ADA notes)	
604 Water Closets and Toilet Compartments (cont.)		Advisory 604.9 Water Closets and Toilet Compartment for Children's Use. The requirements in 604.9 are to be followed where the exception for children's water close to the dispenser shall be 14 inches (355 mm) minimum and 19 inches (485 mm) maximum above the finish floor. There shall be a clearance of 1 1/2 inches (388 mm) minimum below the grab bar. Dispensers shall not be of a type that controls delivery or that does not allow continuous paper flow. 604.9. Toilet Compartments. Toilet compartments shall comply with 604.8. Advisory 604.9 Water Closets and Toilet Compartment in 604.9 are to be followed where the exception for children's Use. The requirements in 604.9 are to be followed where the exception for children's used. The following table provides addition guidance in applying the specifications for water clos for children according to the age group served and retailed to the age of the primary user growth in the installation of a water closet and relements.	ne sets nal ets eflects of up.
605 Urinals	13½ min 345 17 max Figure 605.2 Height and Depth of Urinals	605.1 General. Urinals shall comply with 605. 605.2 Height and Depth. Urinals shall be the stall-type or the wall-hung type with the rim 17 inches (430 mm) maximum above the finish floor or ground. Urinals shall be 13 1/2 inches (345 mm) deep minimum measured from the outer face of the urinal rim to the back of the fixture. 605.3 Clear Floor Space. A clear floor or ground space complying with 305 positioned for forward approach shall be provided. 605.4 Flush Controls. Flush controls shall be hand operated or automatic. Hand operated flush controls shall comply with 309.	

ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN ADVISORY MINIMUM COMPLIANCE (Supplemental ADA notes)
606 Lavatories and Sinks		 606.1 General Lavatories and sinks shall comply with 606. 606.2 Clear Floor Space. A clear floor space complying with 305 spositioned for a forward approach, and knee and toe clearance complying with 305 shall be provided. EXCEPTIONS: 1. A parallel approach complying with 305 shall be permitted to a kitchen sink in a space where a cook top or conventional range is not provided and to wet bars. 2. A lavatory in a toilet room or bathing facility for a single occupant accessed only through a private office and not for common use or public use shall not be required to provide knee and toe clearance complying with 305. 3. In residential dwelling units, cabinerty shall be permitted under lavatories and kitchen sinks provided that all of the following conditions are met: (a) the cobinetry can be removed without removal or replacement of the fixture; (b) the finish floor or ground shall be permitted at lavatories and sinks used primarily by children 6 through 12 years where the rim or counter surface is 31 inches (785 mm) maximum above the finish floor or ground. 5. A parallel approach complying with 305 shall be permitted to lavatories and sinks used primarily by children 5 years and younger. 6. The dip of the overflow shall not be considered in determining knee and toe clearances. 7. No more than one bowl of a multi-bowl sink shall be required to provide knee and toe clearance complying with 306. 606.3 Height. Lavatories and sinks shall be installed with the front of the higher of the rim or counter surface 34 linches (865 mm) maximum above the finish floor or ground. EXCEPTIONS: 1. A lavatory in a toilet on bothing facility for a single occupant accessed only through a private office and not for common use or public use shall not be required to comply with 606.3. 2. In residential dwelling unit kitchens, sinks that are adjustable to variable heights, 29 linches (735 mm) 606.5 Exposed Pipes and Surfaces. Water supply and drain pipes under lavatories and sinks shal





ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN MINIMUM COMPLIANCE	ADVISORY (Supplemental ADA notes)
608 Shower Compartments (cont.)		608.5.3 Alternate Roll-In Type Shower Compartments. In alternate roll-in type shower compartments, the controls, faucets, and shower spray unit shall be located above the grab bar, but no higher than 48 inches (1220 mm) above the shower floor. Where a seat is provided, the controls, faucets, and shower spray unit shall be located on the side wall adjacent to the seat 27 inches (685 mm) maximum from the side wall behind the seat or shall be located on the back wall opposite the seat 15 inches (380 mm) maximum, left or right, of the centerline of the seat. Where a seat is not provided, the controls, faucets, and shower spray unit shall be installed on the side wall farthest from the compartment entry. 608.6 Shower Spray Unit and Water. A shower spray unit with a hose 59 inches (1500 mm) long minimum that can be used both as a fixed-position shower head and as a handheld shower shall be provided. The shower spray unit shall have an on/off control with a non-positive shut-off. If an adjustable-height shower head on a vertical bar is used, the bar shall be installed so as not to obstruct the use of grab bars. Shower spray units shall deliver water that is 120°F (49°C) maximum. EXCEPTION: A fixed shower head located at 48 inches (1220 mm) maximum above the shower finish floor shall be permitted instead of a hand-held spray unit in facilities that are not medical care facilities, long-term care facilities, transient lodging guest rooms, or residential dwelling units. 608.7 Thresholds. Thresholds in roll-in type shower compartments shall be 1/2 inch (13 mm) high maximum in accordance with 303. In transfer type shower compartments, thresholds 1/2 inch (13 mm) high maximum shall be beveled, rounded, or vertical. EXCEPTION: A threshold 2 inches (51 mm) high maximum shall be bermitted in transfer type shower compartments in existing facilities where provision of a 1/2 inch (13 mm) high threshold would disturb the structural reinforcement of the floor slab. 608.8 Shower Enclosures. Enclosures for shower compartments shall	Advisory 608.6 Shower Spray Unit and Water. Ensure that hand-held shower spray units are capable of delivering water pressure substantially equivalent to fixed shower heads.

ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN MINIMUM COMPLIANCE	ADVISORY (Supplemental ADA notes)
610 Seats	Figure 610.2 Bathtub Seats Figure 610.3 Extent of Seat	 610.1 General. Seats in bathtubs and shower compartments shall comply with 610. 610.2 Bathtub Seats. The top of bathtub seats shall be 17 inches (430 mm) minimum and 19 inches (485 mm) maximum above the bathroom finish floor. The depth of a removable in-tub seat shall be 15 inches (380 mm) minimum and 16 inches (405 mm) maximum. The seat shall be capable of secure placement. Permanent seats at the head end of the bathtub shall be 15 inches (380 mm) deep minimum and shall extend from the back wall to or beyond the outer edge of the bathtub. 610.3 Shower Compartment Seats. Where a seat is provided in a standard roll-in shower compartment, it shall be a folding type, shall be installed on the side wall adjacent to the controls, and shall extend from the back wall to a point within 3 inches (75 mm) of the compartment entry. Where a seat is provided in an alternate roll-in type shower compartment, it shall be a folding type, shall be installed on the front wall opposite the back wall, and shall extend from the adjacent side wall to a point within 3 inches (75 mm) of the compartment entry. In transfer-type showers, the seat shall extend from the back wall to a point within 3 inches (75 mm) of the compartment entry. In transfer-type showers, the seat shall extend from the back wall to a point within 3 inches (75 mm) of the compartment entry. The top of the seat shall be 17 inches (430 mm) minimum and 19 inches (485 mm) maximum above the bathroom finish floor. Seats shall comply with 610.3.1 or 610.3.2. 610.3.1 Rectangular Seats. The rear edge of a rectangular seat shall be 2 1/2 inches (64 mm) maximum and the front edge 15 inches (380 mm) minimum and 16 inches (405 mm) maximum from the seat wall. The rear edge of the Seat shall be 1 1/2 inches (38 mm) maximum from the adjacent wall. 610.3.2 L-Shaped Seats. The rear edge of an L-Shaped seat shall be 2 1/2 inches (64 mm) maximum and the front edge 15 inches (380 mm) minimum and 16 inches (405 mm) maximum from the seat shall b	

ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN MINIMUM COMPLIANCE	ADVISORY (Supplemental ADA notes)
611 Washing Machines and Clothes Dryers	Figure 611.4 Height of Laundry Compartment Opening	Gail.1 General. Washing machines and clothes dryers shall comply with 611. Gail.2 Clear Floor Space. A clear floor or ground space complying with 305 positioned for parallel approach shall be provided. The clear floor or ground space shall be centered on the appliance. Gail.3 Operable Parts. Operable parts, including doors, lint screens, and detergent and bleach compartments shall comply with 309. Gail.4 Height. Top loading machines shall have the door to the laundry compartment located 36 inches (915 mm) maximum above the finish floor. Front loading machines shall have the bottom of the opening to the laundry compartment located 15 inches (380 mm) minimum and 36 inches (915 mm) maximum above the finish floor.	

ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN MINIMUM COMPLIANCE	ADVISORY (Supplemental ADA notes)
Chapter 2: Scoping Requirements - 216 Signs			
216 Signs		 216.1 General. Signs shall be provided in accordance with 216 and shall comply with 703. EXCEPTIONS: 1. Building directories, menus, seat and row designations in assembly areas, occupant names, building addresses, and company names and logos shall not be required to comply with 216. 2. In parking facilities, signs shall not be required to comply with 216. 2. In parking facilities, signs shall not be required to comply with 216. 2. 216.3, and 216.6 through 216.12. 3. Temporary, 7 days or less, signs shall not be required to comply with 216. 4. In detention and correctional facilities, signs not located in public use areas shall not be required to comply with 216. 216.2 Designations. Interior and exterior signs identifying permanent rooms and spaces shall comply with 703.1, 703.2, and 703.5. Where pictograms are provided as designations of permanent interior rooms and spaces, the pictograms shall comply with 703.6 and shall have text descriptors complying with 703.2 and 703.5. EXCEPTION: Exterior signs that are not located at the door to the space they serve shall not be required to comply with 703.2. 216.3 Directional and Informational Signs. Signs that provide direction to or information about interior spaces and facilities of the site shall comply with 703.5. 216.4 Means of Egress. Signs for means of egress shall comply with 216.4. 216.4.1 Exit Doors. Doors at exit passageways, exit discharge, and exit stairways shall be identified by tactile signs complying with 703.1, 703.2, and 703.5. 216.4.2 Areas of Refuge. Signs required by section 1003.2.13.5.4 of the International Building Code (2003 edition) (incorporated by reference, see "Referenced Standards" in Chapter 1) to provide instructions in areas of refuge shall comply with 703.5. 216.4.3 Directional Signs. Signs required by section 1003.2.13.6 of the International Building Code (2003 edition) (incorporated by reference, see "Referenced Standards" in Chapter 1) to provide dire	Advisory 216.2 Designations. Section 216.2 applies to signs that provide designations, labels, or names for interior rooms or spaces where the sign is not likely to change over time. Examples include interior signs labeling restrooms, room and floor numbers or letters, and room names. Tactile text descriptors are required for pictograms that are provided to label or identify a permanent room or space. Pictograms that provide information about a room or space, such as "no smoking," occupant logos, and the International Symbol of Accessibility, are not required to have text descriptors. Advisory 216.3 Directional and Informational Signs. Information about interior spaces and facilities includes rules of conduct, occupant load, and similar signs. Signs providing direction to rooms or spaces include those that identify egress routes. Advisory 216.4.1 Exit Doors. An exit passageway is a horizontal exit component that is separated from the interior spaces of the building by fire-resistance-rated construction and that leads to the exit discharge or public way. The exit discharge is that portion of an egress system between the termination of an exit and a public way.

ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN ADVISORY MINIMUM COMPLIANCE (Supplemental ADA notes)
216 Signs (cont.)		 216.5 Parking, Parking spaces complying with 502 shall be identified by signs complying with 502.6. EXCEPTIONS: 1. Where a total of four or fewer parking spaces, including accessible parking spaces, are provided on a site, identification of accessible parking spaces are assigned to specific residential dwelling units, identification of accessible parking spaces shall not be required. 2. In residential facilities, where parking spaces are assigned to specific residential dwelling units, identification of accessible parking spaces shall not be required. 2. 216.6 Entrances. Where not all entrances comply with 404, entrances complying with 404 shall be identified by the International Symbol of Accessibility complying with 703.7.2.1. Directional signs complying with 703.5 that indicate the location of the nearest entrance complying with 404 shall be provided at entrances that do not comply with 404.

ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN MINIMUM COMPLIANCE	ADVISORY (Supplemental ADA notes)
Chapter 7: Communication Elements			
703 Signs		 703.1 General. Signs shall comply with 703. Where both visual and tactile characters are required, either one sign with both visual and tactile characters, or two separate signs, one with visual, and one with tactile characters, shall be provided. 703.2 Raised Characters. Raised characters shall comply with 703.2 and shall be duplicated in Braille complying with 703.3. Raised characters shall be installed in accordance with 703.4. 703.2.1 Depth. Raised characters shall be 1/32 inch (0.8 mm) minimum above their background. 703.2.2 Case. Characters shall be uppercase. 703.2.3 Style. Characters shall be sans serif. Characters shall not be italic, oblique, script, highly decorative, or of other unusual forms. 703.2.4 Character Proportions. Characters shall be selected from fonts where the width of the uppercase letter "0" is 55 percent minimum and 110 percent maximum of the height of the uppercase letter "1". 703.2.5 Character Height. Character height measured vertically from the baseline of the character shall be 5/8 inch (16 mm) minimum and 2 inches (51 mm) maximum based on the height of the uppercase letter "1". EXCEPTION: Where separate raised and visual characters with the same information are provided, raised character height shall be permitted to be ½ inch (13 mm) minimum. 703.2.6 Stroke Thickness. Stroke thickness of the uppercase letter "1" shall be 15 percent maximum of the height of the character. 703.2.7 Character Spacing. Character spacing shall be measured between the two closest points of adjacent raised characters within a message, excluding word spaces. Where characters have rectangular cross sections, spacing between individual raised characters shall be 1/8 inch (3.2 mm) minimum and 4 times the raised character stroke width maximum. Where characters have other cross sections, character stroke width maximum at the base of the cross sections. Character stroke width maximum and 4 times the raised character stro	Advisory 703.2 Raised Characters. Signs that are designed to be read by touch should not have sharp or abrasive edges.

ISSUE	FIGURE	2010 ADA STANDARDS/MAAB 2006 MINIMUM COMPLIANCE	ADVISORY (Supplemental ADA notes)
703 Signs (continued)		 703.3 Braille. Braille shall be contracted (Grade 2) and shall comply with 703.3 and 703.4. 703.3.1 Dimensions and Capitalization. Braille dots shall have a domed or rounded shape and shall comply with Table 703.3.1. The indication of an uppercase letter or letters shall only be used before the first word of sentences, proper nouns and names, individual letters of the alphabet, initials, and acronyms. 703.3.2 Position. Braille shall be positioned below the corresponding text. If text is multi-lined, braille shall be placed below the entire text. Braille shall be separated 3/8 inch (9.5 mm) minimum from any other tactile characters and 3/8 inch (9.5 mm) minimum from raised borders and decorative elements. EXCEPTION: Braille provided on elevator car controls shall be separated 3/16 inch (4.8 mm) minimum and shall be located either directly below or adjacent to the corresponding raised characters or symbols. 703.4 Installation Height and Location. Signs with tactile characters shall comply with 703.4. 703.4.1 Height Above Finish Floor or Ground. Tactile characters on signs shall be located 48 inches (1220 mm) minimum above the finish floor or ground surface, measured from the baseline of the lowest tactile character and 60 inches (1525 mm) maximum above the finish floor or ground surface, measured from the baseline of the highest tactile character. EXCEPTION: Tactile characters for elevator car controls shall not be required to comply with 703.4.1. 703.4.2 Location. Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side. Where a tactile sign is provided at double doors with two active leafs, the sign shall be located to the right of the right hand door. Where there is no wall space at the latch side of a single door or at the right side of double doors, signs shall be located on the nearest adjacent wall. Signs containing tactile characters shall be located so	

ISSUE	FIGURE	2010 ADA STANDARDS/MAAB 2006 MINIMUM COMPLIANCE	ADVISORY (Supplemental ADA notes)
703 Signs (continued)		 703.5 Visual Characters. Visual characters shall comply with 703.5. EXCEPTION: Where visual characters comply with 703.2 and are accompanied by braille complying with 703.3, they shall not be required to comply with 703.5.2 through 703.5.9. 703.5.1 Finish and Contrast. Characters and their background shall have a non-glare finish. Characters shall contrast with their background with either light characters on a dark background or dark characters on a light background. 703.5.2 Case. Characters shall be uppercase or lowercase or a combination of both. 703.5.3 Style. Characters shall be conventional in form. Characters shall not be italic, oblique, script, highly decorative, or of other unusual forms. 703.5.4 Character Proportions. Characters shall be selected from fonts where the width of the uppercase letter "0" is 55 percent minimum and 110 percent maximum of the height of the uppercase letter "1". 703.5.5 Character Height. Minimum character height shall comply with Table 703.5.5. Viewing distance shall be measured as the horizontal distance between the character and an obstruction preventing further approach towards the sign. Character height shall be based on the uppercase letter "1". 703.5.6 Height From Finish Floor or Ground. Visual characters shall be 40 inches (1015 mm) minimum above the finish floor or ground. EXCEPTION: Visual characters indicating elevator car controls shall not be required to comply with 703.5.6. 703.5.7 Stroke Thickness. Stroke thickness of the uppercase letter "1" shall be 10 percent minimum and 30 percent maximum of the height of the character. 703.5.8 Character Spacing. Character spacing shall be measured between the two closest points of adjacent characters, excluding word spaces. Spacing between individual characters shall be 10 percent minimum and 35 percent maximum of the racter height. 703.5.9 Line Spacing. Spacing between the baselines of separate lines of cha	Advisory 703.5.1 Finish and Contrast. Signs are more legible for persons with low vision when characters contrast as much as possible with their background. Additional factors affecting the ease with which the text can be distinguished from its background include shadows cast by lighting sources, surface glare, and the uniformity of the text and its background colors and textures.

ISSUE	FIGURE	2010 ADA STANDARDS/MAAB 2006 MINIMUM COMPLIANCE	ADVISORY (Supplemental ADA notes)
703 Signs (continued)		 703.6 Pictograms. Pictograms shall comply with 703.6. 703.6.1 Pictogram Field. Pictograms shall have a field height of 6 inches (150 mm) minimum. Characters and braille shall not be located in the pictogram field. 703.6.2 Finish and Contrast. Pictograms and their field shall have a non-glare finish. Pictogram shall contrast with their field with either a light pictogram on a dark field or a dark pictogram on a light field. 703.6.3 Text Descriptors. Pictograms shall have text descriptors located directly below the pictogram field. Text descriptors shall comply with 703.2, 703.3 and 703.4. 	
		 703.7 Symbols of Accessibility. Symbols of accessibility shall comply with 703.7. 703.7.1 Finish and Contrast. Symbols of accessibility and their background shall have a non-glare finish. Symbols of accessibility shall contrast with their background with either a light symbol on a dark background or a dark symbol on a light background. 703.7.2.1 phternational Symbol of Accessibility. The International Symbol of Accessibility shall comply with Figure 703.7.2.1. 703.7.2.2 International Symbol of TTY. The International Symbol of TTY shall comply with Figure 703.7.2.2. 703.7.2.3 Volume Control Telephones. Telephones with a volume control shall be identified by a pictogram of a telephone handset with radiating sound waves on a square field such as shown in Figure 703.7.2.3. 703.7.2.4 Assistive Listening Systems. Assistive listening systems shall be identified by the International Symbol of Access for Hearing Loss complying with Figure 703.7.2.4. 	Advisory 703.7.1 Finish and Contrast. Signs are more legible for persons with low vision when characters contrast as much as possible with their background. Additional factors affecting the ease with which the text can be distinguished from its background include shadows cast by lighting sources, surface glare, and the uniformity of the text and background colors and textures

ISSUE	FIGURE	2010 ADA STANDARDS/MAAB 2006 MINIMUM COMPLIANCE	ADVISORY (Supplemental ADA notes)
703 Signs (continued)		 703.5 Visual Characters. Visual characters shall comply with 703.5. EXCEPTION: Where visual characters comply with 703.2 and are accompanied by braille complying with 703.3, they shall not be required to comply with 703.5.2 through 703.5.9. 703.5.1 Finish and Contrast. Characters and their background shall have a non-glare finish. Characters shall contrast with their background with either light characters on a dark background or dark characters on a light background. 703.5.2 Case. Characters shall be uppercase or lowercase or a combination of both. 703.5.3 Style. Characters shall be conventional in form. Characters shall not be italic, oblique, script, highly decorative, or of other unusual forms. 703.5.4 Character Proportions. Characters shall be selected from fonts where the width of the uppercase letter "0" is 55 percent minimum and 110 percent maximum of the height of the uppercase letter "1". 703.5.5 Character Height. Minimum character height shall comply with Table 703.5.5. Viewing distance shall be measured as the horizontal distance between the character and an obstruction preventing further approach towards the sign. Character height shall be based on the uppercase letter "1". 703.5.6 Height From Finish Floor or Ground. Visual characters shall be 40 inches (1015 mm) minimum above the finish floor or ground. EXCEPTION: Visual characters indicating elevator car controls shall not be required to comply with 703.5.6. 703.5.7 Stroke Thickness. Stroke thickness of the uppercase letter "1" shall be 10 percent minimum and 30 percent maximum of the height of the character. 703.5.8 Character Spacing. Character spacing shall be measured between the two closest points of adjacent characters, excluding word spaces. Spacing between individual characters shall be 10 percent minimum and 35 percent maximum of character height. 703.5.9 Line Spacing. Spacing between the baselines of separate lines of char	

ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN MINIMUM COMPLIANCE	ADVISORY (Supplemental ADA notes)
Chapter 8 Special Rooms, Spaces, and Elements			
802 Wheelchair Spaces, Companion Seats, and Designated Aisle Seats	Figure 802.1.2 Width of Wheelchair Spaces Figure 802.1.3 Depth of Wheelchair Spaces	 802.1 Wheelchair Spaces. Wheelchair spaces shall comply with 802.1. 802.1.1 Floor or Ground Surface. The floor or ground surface of wheelchair spaces shall comply with 302. Changes in level are not permitted. EXCEPTION: Slopes not steeper than 1:48 shall be permitted. 802.1.2 Width. A single wheelchair space shall be 36 inches (915 mm) wide minimum Where two adjacent wheelchair spaces are provided, each wheelchair space shall be 33 inches (840 mm) wide minimum. 802.1.3 Depth. Where a wheelchair space can be entered from the front or rear, the wheelchair space shall be 48 inches (1220 mm) deep minimum. Where a wheelchair space can be entered only from the side, the wheelchair space shall be 60 inches (1525 mm) deep minimum. 802.1.4 Approach. Wheelchair spaces shall adjoin accessible routes. Accessible routes shall not overlap wheelchair spaces. 802.3 Companion Seats. Companion seats shall comply with 802.3.802.3.1 Alignment. In row seating, companion seats shall be located to provide shoulder alignment with adjacent wheelchair spaces. The shoulder alignment point of the wheelchair space shall be measured 36 inches (915 mm) from the front of the wheelchair space. The floor surface of the companion seat shall be at the same elevation as the floor surface of the wheelchair space. 802.1.5 Overlap. Wheelchair spaces shall not overlap circulation paths. 802.2 Lines of Sight. Lines of sight to the screen, performance area, or playing field for spectators in wheelchair spaces shall comply with 802.2. 802.2.1 Lines of Sight Over Seated Spectators. Where spectators are expected to remain seated during events, spectators are expected to remain seated during events, spectators are expected to remain seated during events, spectators in wheelchair spaces shall be afforded lines of sight over the heads of spectators eated in the first row in front of wheelchair spaces. 802.2.1.1 Lines of Sight Over Heads. Where spectators are provided lin	Advisory 802.1.4 Approach. Because accessible routes serving wheelchair spaces are not permitted to overlap the clear floor space at wheelchair spaces, access to any wheelchair space cannot be through another wheelchair space. Advisory 802.1.5 Overlap. The term "circulation paths" used in Section 802.1.5 means aisle width required by applicable building or life safety codes for the specific assembly occupancy. Where the circulation path provided is wider than the required aisle width, the wheelchair space may intrude into that portion of the circulation path that is provided in excess of the required aisle width.

ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN ADVISORY MINIMUM COMPLIANCE (Supplemental ADA notes)
802 Wheelchair Spaces, Companion Seats, and Designated Aisle Seats (cont.)	Figure 802.2.1.1 Lines of Sight Over Lines of Sight Be-	 802.2.2 Lines of Sight Over Standing Spectators. Where spectators are expected to stand during events, spectators in wheelchair spaces shall be afforded lines of sight complying with 802.2.2. 802.2.2.1 Lines of Sight Over Heads. Where standing spectators are provided lines of sight over the heads of spectators standing in the first row in front of their seats, spectators seated in wheelchair spaces shall be afforded lines of sight over the heads of standing spectators in the first row in front of wheelchair spaces. 802.2.2.2 Lines of Sight Ever Heads. Where standing
	the Heads of Seated Spectators tween the Heads of Seated Spectators	spectators are provided lines of sight over the shoulders and between the heads of spectators standing in the first row in front of their seats, spectators seated in wheelchair spaces shall be afforded lines of sight over the shoulders and between the heads of standing spectators in the first row in front of wheelchair spaces. 802.3 Companion Seats. Companion seats shall comply with 802.3. 802.3.1 Alignment. In row seating, companion seats shall be located to provide shoulder alignment with adjacent wheelchair spaces. The shoulder alignment point of the wheelchair space shall be measured 36 inches (915 mm)
	Figure 802.2.2.1 Lines of Sight Over the Heads of Standing Spectators Figure 802.2.2.2 Lines of Sight Between the Heads of Standing Spectators	from the front of the wheelchair space. The floor surface of the companion seat shall be at the same elevation as the floor surface of the wheelchair space. 802.3.2 Type. Companion seats shall be equivalent in size, quality, comfort, and amenities to the seating in the immediate area. Companion seats shall be permitted to be movable. 802.4 Designated Aisle Seats. Designated aisle seats shall comply with 802.4. 802.4.1 Armrests. Where armrests are provided on the seating in the immediate area, folding or retractable armrests shall be provided on the aisle side of the seat. 802.4.2 Identification. Each designated aisle seat shall be identified by a sign or marker.

ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN MINIMUM COMPLIANCE	ADVISORY (Supplemental ADA notes)
803 Dressing, Fitting, and Locker Rooms		 803.1 General. Dressing, fitting, and locker rooms shall comply with 803. 803.2 Turning Space. Turning space complying with 304 shall be provided within the room. 803.3 Door Swing. Doors shall not swing into the room unless a clear floor or ground space complying with 305.3 is provided beyond the arc of the door swing. 803.4 Benches. A bench complying with 903 shall be provided within the room. 803.5 Coat Hooks and Shelves. Coat hooks provided within the room shall be located within one of the reach ranges specified in 308. Shelves shall be 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor or ground. 	Advisory 803.1 General. Partitions and doors should be designed to ensure people using accessible dressing and fitting rooms privacy equivalent to that afforded other users of the facility. Section 903.5 requires dressing room bench seats to be installed so that they are at the same height as a typical wheelchair seat, 17 inches (430 mm) to 19 inches (485 mm). However, wheelchair seats can be lower than dressing room benches for people of short stature or children using wheelchairs.
804 Kitchens and Kitchenettes		 804.1 General. Kitchens and kitchenettes shall comply with 804. 804.2 Clearance. Where a pass through kitchen is provided, clearances shall comply with 804.2.1. Where a U-shaped kitchen is provided, clearances shall comply with 804.2.2. EXCEPTION: Spaces that do not provide a cooktop or conventional range shall not be required to comply with 804.2. 804.4 Sinks. Sinks shall comply with 606. 804.5 Storage. At least 50 percent of shelf space in storage facilities shall comply with 811. 804.6 Appliances. Where provided, kitchen appliances shall comply with 804.6. 804.6.1 Clear Floor or Ground Space. A clear floor or ground space complying with 305 shall be provided at each kitchen appliance. Clear floor or ground spaces shall be permitted to overlap. 804.6.2 Operable Parts. All appliance controls shall comply with 309. EXCEPTIONS: 1. Appliance doors and door latching devices shall not be required to comply with 309.4. 2. Bottomhinged appliance doors, when in the open position, shall not be required to comply with 309.3. 	Advisory 804.2 Clearance. Clearances are measured from the furthest projecting face of all opposing base cabinets, counter tops, appliances, or walls, excluding hardware.
811 Storage		 811.1 General. Storage shall comply with 811. 811.2 Clear Floor or Ground Space. A clear floor or ground space complying with 305 shall be provided. 811.3 Height. Storage elements shall comply with at least one of the reach ranges specified in 308. 811.4 Operable Parts. Operable parts shall comply with 309. 	

ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN MINIMUM COMPLIANCE	ADVISORY (Supplemental ADA notes)
Chapter 9 Built-In Elements			
902 Dining Surfaces and Work Surfaces		902.1 General. Dining surfaces and work surfaces shall comply with 902.2 and 902.3. EXCEPTION: Dining surfaces and work surfaces for children's use shall be permitted to comply with 902.4. 902.2 Clear Floor or Ground Space. A clear floor space complying with 305 positioned for a forward approach shall be provided. Knee and toe clearance complying with 306 shall be provided. 902.3 Height. The tops of dining surfaces and work surfaces shall be 28 inches (710 mm) minimum and 34 inches (865 mm) maximum above the finish floor or ground.	Advisory 902.1 General. Dining surfaces include, but are not limited to, bars, tables, lunch counters, and booths. Examples of work surfaces include writing surfaces, study carrels, student laboratory stations, baby changing and other tables or fixtures for personal grooming, coupon counters, and where covered by the ABA scoping provisions, employee work stations.
903 Benches	Figure 903.4 Bench Back Support	 903.1 General. Benches shall comply with 903. 903.2 Clear Floor or Ground Space. Clear floor or ground space complying with 305 shall be provided and shall be positioned at the end of the bench seat and parallel to the short axis of the bench. 903.3 Size. Benches shall have seats that are 42 inches (1065 mm) long minimum and 20 inches (510 mm) deep minimum and 24 inches (610 mm) deep maximum. 903.4 Back Support. The bench shall provide for back support or shall be affixed to a wall. Back support shall be 42 inches (1065 mm) long minimum and shall extend from a point 2 inches (51 mm) maximum above the seat surface. Back support shall be 21/2 inches (64 mm) maximum from the rear edge of the seat measured horizontally. 903.5 Height. The top of the bench seat surface shall be 17 inches (430 mm) minimum and 19 inches (485 mm) maximum above the finish floor or ground. 903.6 Structural Strength. Allowable stresses shall not be exceeded for materials used when a vertical or horizontal force of 250 pounds (1112 N) is applied at any point on the seat, fastener, mounting device, or supporting structure. 903.7 Wet Locations. Where installed in wet locations, the surface of the seat shall be slip resistant and shall not accumulate water. 	Advisory 903.4 Back Support. To assist in transferring to the bench, consider providing grab bars on a wall adjacent to the bench, but not on the seat back. If provided, grab bars cannot obstruct transfer to the bench.
904 Check-Out Aisles and Sales and Service Counters		904.1 General. Check-out aisles and sales and service counters shall comply with the applicable requirements of 904. 904.2 Approach. All portions of counters required to comply with 904 shall be located adjacent to a walking surface complying with 403. 904.3 Check-Out Aisles. Check-out aisles shall comply with 904.3. 904.3.1 Aisle. Aisles shall comply with 403.	Advisory 904.2 Approach. If a cash register is provided at the sales or service counter, locate the accessible counter close to the cash register so that a person using a wheelchair is visible to sales or service personnel and to minimize the reach for a person with a disability.

ISSUE	FIGURE	2010 ADA STANDARDS FOR ACCESSIBLE DESIGN MINIMUM COMPLIANCE	ADVISORY (Supplemental ADA notes)
904 Check-Out Aisles and Sales and Service Counters (cont.)	Figure 904.3.2 Checkl-Out Aisle Counters	 904.3.2 Counter. The counter surface height shall be 38 inches (965 mm) maximum above the finish floor or ground. The top of the counter edge protection shall be 2 inches (51 mm) maximum above the top of the counter surface on the aisle side of the check-out counter. 904.3.3 Check Writing Surfaces. Where provided, check writing surfaces shall comply with 902.3. 904.4 Sales and Service Counters. Sales counters and service counters shall comply with 904.4.1 or 904.4.2. The accessible portion of the counter top shall extend the same depth as the sales or service counter top. EXCEPTION: In alterations, when the provision of a counter complying with 904.4 would result in a reduction of the number of existing counters at work stations or a reduction of the number of existing mail boxes, the counter shall be permitted to have a portion which is 24 inches (610 mm) long minimum complying with 904.4.1 provided that the required clear floor or ground space is centered on the accessible length of the counter. 904.4.1 Parallel Approach. A portion of the counter surface that is 36 inches (915 mm) long minimum and 36 inches (915 mm) high maximum above the finish floor shall be provided. A clear floor or ground space complying with 305 shall be positioned for a parallel approach adjacent to the 36 inch (915 mm) minimum length of counter. EXCEPTION: Where the provided counter surface is less than 36 inches (915 mm) high maximum above the finish floor. 904.4.2 Forward Approach. A portion of the counter surface shall be 36 inches (915 mm) high maximum above the finish floor. 904.5.1 Self-Service Shelves and Dispensing Devices. Self-service shelves and dispensing devices for tableware, dishware, condiments, food and beverages shall comply with 305 shall be positioned for a forward approach to the counter. 904.5.2 Tray Sildes. The tops of tray sildes shall be 28 inches (710 mm) minimum and 34 inches (865 mm) maximum above the finish floor or ground.<td>Advisory 904.6 Security Glazing. Assistive listening devices complying with 706 can facilitate voice communication at counters or teller windows where there is security glazing which promotes distortion in audible information. Where assistive listening devices are installed, place signs complying with 703.7.2.4 to identify those facilities which are so equipped. Other voice communication methods include, but are not limited to, grilles, slats, talk-through baffles, intercoms, or telephone handset devices.</td>	Advisory 904.6 Security Glazing. Assistive listening devices complying with 706 can facilitate voice communication at counters or teller windows where there is security glazing which promotes distortion in audible information. Where assistive listening devices are installed, place signs complying with 703.7.2.4 to identify those facilities which are so equipped. Other voice communication methods include, but are not limited to, grilles, slats, talk-through baffles, intercoms, or telephone handset devices.

