

Lee ADA Self-Evaluation and Transition Plan

June 2024



BRPC

Berkshire Regional Planning Commission

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Introduction

The town of Lee is a rural community in the westernmost region of the Commonwealth. With a population of 5,788, it is the seventh largest community out of 32 cities and towns in Berkshire County. Lee is a quintessential New England town with a walkable and active downtown nestled in a mountainous and scenic landscape.

Lee aligns with the regional trend of communities with an increasingly aging population. According to the 2022 American Community Survey Five-year Estimates, the median age is 51.4, which is an increase from 44.2 a decade prior and below the statewide median age of 40.3.

Older adults develop disabilities more frequently and countywide communities are seeking ways to become more age-friendly by providing more convenient opportunities for people to access services, recreation, and basic needs.

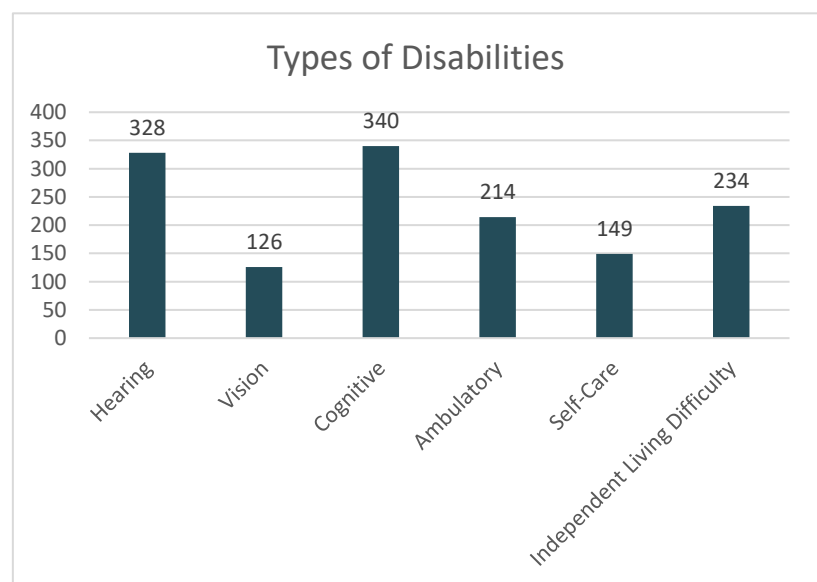
According to the ACS, approximately 15.6% of Lee's population currently has a disability. The disabilities range in types, from those with hearing difficult to people who struggle to live independently.

The trend demonstrates a need to be more inclusive in the way towns provide access and services. However, accessibility standards do not solely address the needs of those with a disability. Increasing accessibility for people with disabilities increases accessibility for abled-bodied people as well.

As an employer, it is law that the town cannot discriminate in its hiring or labor practices against people with a disability, which Lee takes seriously and has anti-discriminatory policies in place.

The town also wants to support its workers who have a disability, get hurt, or develop one over time. Lee recently experienced such a situation first-hand when its long-time police chief developed amyotrophic lateral sclerosis (ALS). The town made accommodation for the chief to come into the workplace frequently, passing on institutional knowledge and skills he had gained during his years of service.

Over the years, Lee has and continues to seek opportunities to eliminate barriers to goods, services, and opportunities. The support from the Massachusetts Commission on Disability provided the funding for the town to conduct an ADA Self-Evaluation and Transition Plan. The evaluation identifies physical accessibility barriers in all municipally owned buildings and parks and programmatic barriers to services.



Source: American Community Survey, 2022 Five-year Estimates, Table 1810.

The transition plan establishes a roadmap for towns to increase accessibility, confirms adherence to the Americans with Disabilities Act, and enables the community to apply for financial support to implement the established goals.

The timing of the evaluation and planning is ideal. Lee voters approved construction of a new public safety building. The spaces that Police, Fire, and EMS currently occupy have significant space restraints, aging infrastructure, and numerous accessibility barriers. The new building will be up to code and accessible. The community will next have to determine how to reuse those vacant spaces. The evaluation and transition plan guides improvements the town can make in the structures that will remain occupied by its current use and provides information about re-use potential of the other spaces.

Lee contracted with the Berkshire Regional Planning Commission to conduct the self-evaluation and write the transition plan. All department heads occupying and maintaining town-owned spaces welcomed the evaluation process and provided detailed information about the services, the spaces, and any accessibility challenges, providing important context to incorporate in the plan's development.

Town Administrator/ADA Coordinator Christopher Brittain, Building Commissioner Matt Kollmer, and Department of Public Works Superintendent Lenny Tisdale reviewed the drafts of the plans and prioritized the implementation recommendations.

Federal, State, and Local Regulations

Architectural Barriers Act of 1968 (ABA)

The Architectural Barriers Act (ABA) requires that buildings and facilities that are designed, constructed, or altered with federal funds, or leased by a federal agency comply with federal standards for physical accessibility. ABA requirements are limited to the architectural design in new and altered buildings and in newly leased facilities.

Section 504 of The Rehabilitation Act of 1973

Section 504 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 or is conducted by any executive agency or the United States Postal Service.

Every federal agency has its own section 504 regulations. Agencies that provide federal financial assistance also have section 504 regulations covering entities that receive the aid. Common 504 regulations include reasonable accommodation for employees with disabilities, program accessibility, effective communication with people who have hearing or vision disabilities, and accessible new construction and alterations.

The Americans with Disabilities Act of 1990 (ADA)

The ADA prohibits discrimination based on disability in employment, state and local government, public accommodations, commercial facilities, transportation, and telecommunications. It also applies to the United States Congress. There are five titles that outline ADA requirements for employment, state and local government activities, public transportation, public accommodations, and telecommunications access.

Title II applies to "public entities" and the programs, services, and activities they provide. Title II outlines the requirements for the Self-Evaluation and Transition Plan and the appointment of an ADA coordinator.

In 1992, the U.S. Department of Justice issued 28 Code of Federal Regulations (CFR) Part 35, Nondiscrimination on the Basis of Disability in State and Local Governmental Services, to implement Subtitle A of Title II. This regulation extended the prohibition of discrimination in federally assisted programs already established by Section 504 of the Rehabilitation Act to all activities of state and local governments, including those that do not receive federal financial assistance.

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

The Massachusetts Architectural Access Board (MAAB) is a state regulatory agency under the Executive Office of Public Safety responsible for developing and enforcing regulations to make public buildings accessible to, functional for, and safe for people of all abilities. MAAB regulations are incorporated into the Massachusetts Building Code.

The 2010 ADA Standards for Accessible Design (ADA Standards)

The ADA Standards outline the requirements necessary to make a building or other facility physically accessible to people with disabilities. The standards are a comprehensive guide that identifies what features will need to be accessible and list the specifications required to make them compliant.

Accessibility and Discrimination

Accessibility plays a significant role in providing equitable opportunities. Municipalities should strive to create an accessible, barrier-free environment to encourage community participation and uphold the rights of people with disabilities. State and federal regulations require towns to remove structural barriers in public areas of existing facilities when such removal is readily achievable. Barriers typically found in public areas include routes of travel requiring the use of stairs, non-ADA compliant ramps, door widths that cannot accommodate the passage of a wheelchair, and the location of door handles that are too high.

Discrimination against individuals with disabilities occurs when a person is perceived differently, treated differently, and struggles to gain acceptance at a level experienced by their non-disabled peers. Physical barriers are discriminatory because they exclude that individual from reaching their desired destination or performing a specific task or action. All state and local governments are required to follow specific architectural standards in either the new construction or the alteration of existing buildings unless the corrective actions would result in undue financial or administrative burdens.

To promote inclusivity, public entities are required to make reasonable modifications. The modifications provide equality of opportunity, but the municipality cannot guarantee equal results.

Program Accessibility

Title II requires local governmental agencies to ensure that all their programs, services, and activities, when viewed in their entirety, are accessible to persons with disabilities. Program access is intended to remove physical barriers to the local governmental agency services, programs, and activities, but it generally does not require that the local governmental agency make each facility, or each part of any given facility, accessible. For example, a municipality does not need to ensure that every restroom in a facility is accessible, but it must post signage directing people with disabilities to accessible features and spaces.

Municipalities can achieve programmatic accessibility in a variety of ways. Local governmental agencies may choose to make structural changes or pursue alternatives to structural changes to achieve access. For example, the local governmental agency can move public meetings to accessible buildings and/or relocate services to accessible levels or parts of a building. Local governmental agencies must give priority to the alternatives that offer services, programs, and activities in the most integrated setting available and appropriate. Additionally, all newly constructed public facilities must be fully accessible to people with disabilities.

Undue Burden

A “grandfather clause” does not exist in the ADA; however, the law is flexible. Local government agencies must comply with Title II of the ADA and must provide program access for all individuals. A local governmental agency does not have to take any action to make a feature compliant to ADA standards if that agency can demonstrate that the alteration will result in the creation of a fundamental alteration to the program or service or will cause undue financial and/or administrative burden.

The determination of an undue burden can only be made by the leader of the local public agency (or a designee) and must be accompanied by a written statement outlining its reasoning. To establish that an alteration of a feature will cause undue financial and/or administrative burden, the town must conduct an evaluation of all resources available for use in the program. The town’s evaluation of resources must include the number of financial resources available, the effect of the expenses, the type and location of the facility, and the number of employees at the site. If an alteration of a feature would result in a burden, the public entity must take another action that would not result in an undue burden but would ensure that individuals with disabilities receive the benefits and services of the program or activity.

Safe Harbor

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

Historic Properties

The ADA provides exemptions for historic properties that are listed, or are eligible for listing, in the National Register of Historic Places or a property designated as historic under state or local law. A public entity is not required to make alterations that would destroy or threaten the historical significance of an historic property. In historic properties, towns can utilize alternatives outlined in 28 CFR 36.405 and ADAAG 4.1.7(3). An example of an alternative requirement would include providing displays and written information in a location where they can be seen by a seated person.

Curb Ramps

When public entities construct or alter roadways, it must install ramps to overcome physical barriers at the connection point between the roadway and a pedestrian walkway. When the municipality builds or alters sidewalks or walkways, it must install curb ramps or sloped areas wherever the sidewalk intersects with a roadway.

However, on existing roads and sidewalks that have not been altered, local governmental agencies may choose to construct curb ramps at every point where a pedestrian walkway intersects a curb, but they are not necessarily required to do so. Under program access, alternative routes to buildings that make use of existing curb ramps may be acceptable where persons with disabilities must only travel a marginally longer route.

ADA Title II Self-Evaluation And Transition Plan

The self-evaluation helps determine the adequacy of ADA compliance in public buildings, services, meetings, and programs. If the town decides there is an undue burden in providing access or services, such as a fundamental alteration of a building or service provided or a financial burden, state and local governments must ensure that those decisions are made properly and expeditiously.

The self-evaluation needs to include the persons consulted, problem areas, and a description of any modifications. The activities and requirements the town should evaluate are:

- All physical barriers to accessibility.
- Adequate access to public meetings.
- Construction and design standards.
- Access to historic buildings where reasonable.
- Program materials.
- Employment practices
- Programs, activities, and services.
- Access for TDD's and TTY's.
- Provisions for readers or interpreters and assistive technology is properly maintained.
- Availability of policies and practices.
- Procedures to evacuate individuals with disabilities during an emergency.

As for any community, transitioning into full ADA compliance is a long-term goal. Full ADA compliance can only be achieved through evaluating the existing conditions that present barriers to accessibility, and then carefully planning and providing support for the required improvements. The state and federal government does not expect towns to transition into full compliance immediately; improvements should be planned as funding from various sources becomes available and coordinated to occur as other capital improvements are undertaken.

The transition plan establishes a prioritized list of actions the municipality intends to undertake to improve accessibility.

Three Preliminary Steps to ADA Compliance

The ADA requires towns to undertake the following actions.

Designation of an ADA Coordinator

Title II applies to programs, services, and agencies of state and local governments, regardless of the size of the public entity. All municipalities must designate at least one municipal employee to take on the functional responsibilities as an ADA Coordinator. This position bears the full responsibility of implementing the ADA.

The most important responsibility of an ADA Coordinator is to learn and understand all of the ADA regulations as it pertains to the municipality. The coordinator must recognize that the ADA is a civil rights law and not a building code. The coordinator should should:

- Have knowledge of all municipal programs, services, and eligibility requirements.
- Be familiar with Human Resources as it applies to employment laws, policies, grievances, and effective accommodations.
- Have access to facilities personnel and local Building Inspectors to consult on architectural accessibility concerns.
- Have knowledge of the municipal ADA Transition Plan and administration of the plan's compliance, amendments, and reviews.

The town of Lee appointed Christopher Brittain as the ADA Coordinator.

Posting of an ADA Notice

The town shall publicly post notice that it abides by Title II of the Americans with Disabilities Act. The notice must be posted in perpetuity in at least one prominent public area. The notice is required to include relevant information regarding Title II of the ADA, and how it applies to the programs, services, and activities of the public entity.

The notice should not be overwhelming. An effective notice states the basics of what the ADA requires of the state or local government without being too lengthy, legalistic, or complicated. It should include the name and contact information of the ADA Coordinator.

The town of Lee routinely updates and publishes its ADA notice. The town's current posting is on the next page.



TOWN OF LEE

Office of Select Board
32 Main Street
Lee, Massachusetts 01238

Tel. (413) 409-5975
Fax (413) 243-5507
Email: selectboard@lee.ma.us
Website: lee.ma.us

The Town of Lee does not discriminate on the basis of disability in admission to, access to, or in the operation of its programs, services or activities. The Town of Lee does not discriminate on the basis of disability in its hiring or employment practices.

This notice is provided as required by Title II of the Americans with Disabilities Act (ADA) of 1990.

Questions, concerns, complaints, or requests for additional information regarding the ADA may be forwarded to the Town of Lee's Town ADA Coordinator:

R. Christopher Brittain

Town Hall
32 Main Street
Lee, Massachusetts 01238

Phone: (413) 243-5500
Fax: (413) 243-5507
christopher.brittain@lee.ma.us

Office Hours:
Mondays & Wednesdays – 8:30AM – 4:00PM
Tuesdays & Thursdays – 8:30AM – 5:30PM
Fridays – 8:30AM – 12:30PM

Individuals who need auxiliary aids for effective communication in programs and services of the Town of Lee are invited to make their needs and preferences known to the ADA Coordinator.

This Notice is available in large print and audiotape from the ADA Coordinator.

Posting of General ADA Grievance Procedure

Local governments with 50 or more employees are required to adopt and publish procedures for resolving grievances arising under Title II of the ADA. Grievance procedures establish a system to resolve complaints of discrimination in a prompt and fair manner. Neither Title II nor its implementing regulations describe what ADA grievance procedures must include but the Department of Justice advises that grievance procedure should include:

- A description of how and where a complaint under Title II may be filed with the government entity.
- If a written complaint is required, a statement notifying potential complainants that alternative means of filing will be available to people with disabilities who require such an alternative.
- A description of the time frames and processes to be followed by the complainant and the government entity.
- Information on how to appeal an adverse decision.
- A statement of how long complaint files will be retained.

Below is Lee's grievance policy.

NONDISCRIMINATION ON THE BASIS OF DISABILITY

Adopted: January 19, 2016

Title II of the Americans With Disabilities Act of 1992 requires that no qualified individual with a disability shall, because the Town of Lee facilities are inaccessible to or unusable by individuals with disabilities, be excluded from participation in, or be denied the benefits of the services, programs, and activities of the Town of Lee or be subject to discrimination. Nor shall the Town of Lee exclude or otherwise deny services, programs or activities to an individual because of the known disability of a person with whom the individual is known to have a relationship or association.

Definition: A "qualified individual with a disability" is an individual with a disability who, with or without reasonable modification to rules, policies, or practices, the removal of architectural, communication, or transportation barriers, or the provision of auxiliary aides and services, meets the essential eligibility requirements for the receipt of services or the participation in programs or activities provided by the Town of Lee.

Reasonable Modification: The Town of Lee shall make reasonable modification in policies, practices or procedures when the modifications are necessary to avoid discrimination on the basis of disability, unless the Town of Lee can demonstrate that making the modifications would fundamentally alter the nature of the service, program or activity.

Communications: The Town of Lee shall take the appropriate steps to ensure that communications with applicants, participants, and members of the public with disabilities are as effective as communications with others. To this end, the Town of Lee shall furnish appropriate auxiliary aids and services where necessary to afford an individual with a disability an equal opportunity to participate in, and enjoy benefits of, a services, program or activity conducted by the Town of Lee. In determining what type of auxiliary aid or service is necessary, the Town of Lee shall give primary consideration to the requests of individuals with disabilities.

Auxiliary Aids and Services: "Auxiliary aids and services" includes (1) qualified interpreters, note takers, transcription services, written materials, assisted listening systems, and other effective methods for making aurally delivered materials available to individuals with hearing impairments; (2) qualified readers, taped texts, audio records, Braille materials, large print materials, or other effective methods for making visually delivered materials available to individuals with visual impairments; (3) acquisition or modification of equipment or devices and (4) other similar services and actions.

Limits of Required Modification: The town of Lee is not required to take any action that it can demonstrate would result in a fundamental alteration in the nature of a service, program or activity or in undue financial and administrative burdens. Any decision that, in compliance with its responsibility to provide effective communication for individuals with disabilities, would fundamentally alter the service, program or activity or unduly burden the Town of Lee shall be made by the Selectmen after considering all resources available for use in funding and operating the program, service or activity. A written statement of the reasons for reaching that conclusion shall accompany the decision.

Notice: The Town of Lee shall make available to applicants, participants, beneficiaries, and other interested persons information regarding the provisions of Title II of the American with Disabilities Act (ADA) and its applicability to the service, programs or activities of the Town of Lee. The information shall be made available in such a manner as the Selectmen and Town Administrator find it necessary to apprise such person of the protections against discrimination assured them by the ADA.

Compliance Coordinator: The Town of Lee shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under Title II of ADA, including any investigation of any complaint communicated to it alleging its noncompliance or alleging any actions that would be prohibited under ADA. The town of Lee shall make available to all interested individuals the name, office address and telephone number of the employee(s) so designated and shall adopt and publish procedures for the prompt and equitable resolution of complaints alleging any action that would be prohibited under the ADA.

The Selectmen are of the general view that:

1. Discrimination against a qualified disabled person solely on the basis of handicap is unfair; and
2. To the extent possible, qualified disabled persons should be in the mainstream of life in the Town of Lee. Accordingly, employees of the Town of Lee will comply with the above requirements of the law and policy statements of this Committee to ensure nondiscrimination on the basis of handicap.

Evaluation of Town Policies and Procedures

Evaluation of policies and procedures that will have an impact on equal access to town services, programs, and activities is required under Title II of the Americans with Disabilities Act. Inadequate or non-existent policies and procedures can be a large non-structural barrier to equal access for people with disabilities. As a small local government, it is not unusual that Lee has not yet had the opportunity to implement policies and procedures required under Title II of the ADA. Lee has a public notice of non-discrimination and an ADA grievance procedure.

Lee Appointed Town Manager Christopher Brittain as its ADA Coordinator. It is important that key town staff receive training in awareness of and response to the responsibilities of implementing the ADA requirements. With their recent efforts to implement projects that make town buildings more accessible, the town has committed to implementing helpful and accommodating policies that will make them better aligned with Title II requirements.

BRPC staff worked with town staff to evaluate other town policies and procedures that may already be in place or should be in place to better accommodate people with disabilities. This includes department-specific training, policies, or procedures, as well as emergency management, and access to voting, town departments, and town boards and commissions.

Evaluation of Town Departments

Each department has unique responsibilities and employment qualifications. Few departments have departmental specific ADA policies, provide employees training, and procedures for accommodations.

Depts.	Services	ADA Training	ADA Policy	Accommodations
Accountant	Oversees all aspects of municipal finance.	No	No	No
Ambulance	Responds and provides medical care and transportation during emergencies.	No	No	No
Animal Control	Oversees licensing and vaccinations of domestic pets, catches and returns lost animals to owners, oversees barn inspections, investigates animal complaints and animal cruelty.	No	No	No
Assessor	Oversees town taxes and provides the public with information on real estate, personal property, and land assessments.	No	No	No
Building Safety	Oversees permitting and inspection processes.	Yes	No	No
Police	Responds and investigates reports of criminal activity.	No	No	No
Conservation Commission	The Conservation Commission manages the town conservation issues. Responsibilities include administration of the Wetland Protection Act and the Scenic Mountain Act of 2008. Commission provides guidance to property owners.	No	No	No
Department of Public Works	Responsible for the maintenance of the town's physical infrastructure.	No	No	No
Fire Department	Provides fire and medical responses during an emergency.	No	No	No
Land Use	Oversees land use issues including development and revisions to zoning bylaws, subdivision regulations, permitting, and provides	No	No	No

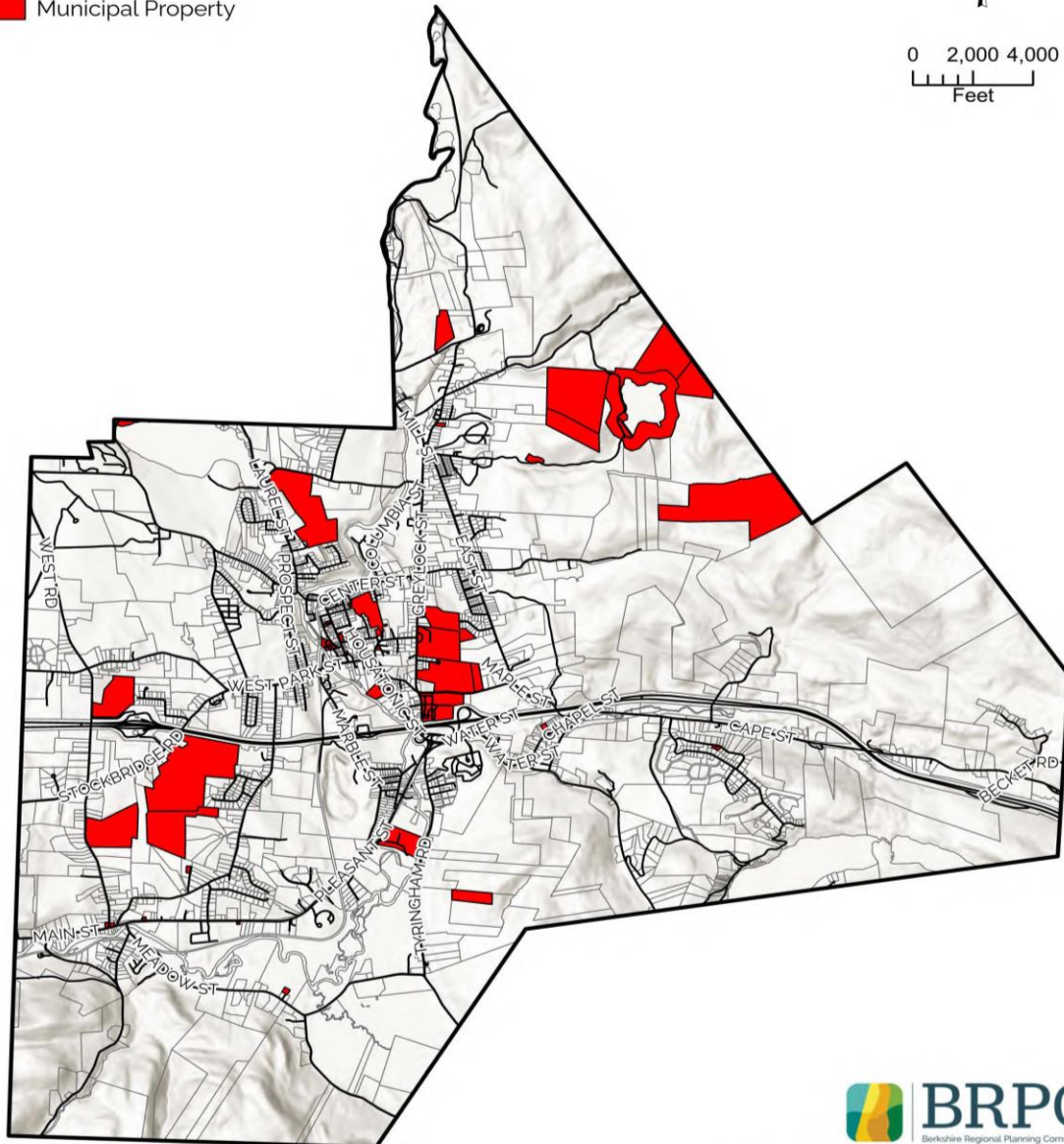
Evaluation of Town Policies and Procedures

	technical guidance on site plan and special permit applications.			
Library	Provides the public with books and multi-media lending to support education.	No	No	No
Senior Services	The COA offers a variety of social, health, educational, recreational, advocacy, and support programs designed to help our senior population.	No	No	No
Town Administrator	Oversee all aspects of town government, establishes the town's long-term vision, makes short-term and long-term financing decisions, and manages staffing.	No	No	No
Town Clerk	Custodian of records for births, deaths, burials, marriages, business certificates, census records, voting records and town records. Serves as Election and Records Access Officer.	No	No	No
Treasurer	Accounts for all money belonging to the town and provides oversight on payroll, benefits, retirement, and insurances. The treasurer collects all taxes and pursues resolutions to delinquency.	No	No	No
Tri-Town Health Department	Oversees all matters relating to the public health and wellbeing.	No	No	No
Veterans Affairs	Provides guidance, case management, and recommendations for veterans to obtain benefits and services.	No	No	No
Wastewater Department	Responsible for the treatment and disposal of the town's wastewater.	No	No	No
Water Department	Ensures town's water supply is clean and safe.	No	No	No
Housing Authority	Manages all aspects of the public housing facilities.	No	No	No
Youth Commission	Develops and implements programming and activities to empower healthy youth.	No	No	No

Town-owned Properties and Facilities

Town of Lee Town Owned Land

■ Municipal Property



The Berkshire Regional Planning Commission created this map for general planning purposes only. It is not to be used for engineering, survey, legal, or regulatory purposes. MassGIS, MassDOT, BRPC, or the municipality may have supplied portions of this data.

Section 35.151(a), which provided that those facilities that are constructed or altered by, on behalf of, or for the use of a public entity shall be designed, constructed, or altered to be readily accessible to and usable by individuals with disabilities. The path of travel requirements contained in the title III regulation are based on section 303(a)(2) of the ADA, 42 U.S.C 12183(a)(2), which provides that when an entity undertakes an alteration to a place of public accommodation or commercial facility that affects or could affect the usability of or access to an area that contains a primary function, the entity shall ensure that, to the maximum extent feasible, the path of travel to the altered area and the restrooms, telephones and water fountains serving the altered area are readily accessible to and usable by individuals with disabilities.

The Department of Justice recognizes four priorities as equally applicable to state and local government facilities.

- **Priority 1 – Accessible Approach and Entrance**
- **Priority 2 – Access to Goods and Services**
- **Priority 3 – Access to Public Toilet Rooms**
- **Priority 4 – Access to Other Items Such as Water Fountains**

Unless otherwise noted, BRPC assessed all buildings and parks according to 2010 ADA Standards. BRPC assessed the sidewalks according to U.S. Access Board's Public Right-of-Way Accessibility Guidelines.

BRPC and the committee assessed the following municipally owned buildings:

- Airoidi Building – 37 Railroad Street
- Ambulance Garage – 177 Main Street
- Central Fire Station – 179 Main Street
- DPW Garage – 35 Railroad Street
- Lee Library – 100 Main Street
- Police Department – 32 Main Street
- South Lee Fire Station – 10 Church Street
- Town Hall – 32 Main Street
- Waste Water Treatment Plant – 379 Pleasant Street

BRPC and the committee assessed the following municipally owned parks and conservation properties:

- Athletic Field
- Bradley Street Playground
- Dunn Park
- East Lee Park
- Edith Wharton Conservation Area
- Ferncliff Reservation
- Gazebo
- Lee Sandy Beach
- Lee High School Parks
- Longscope Property
- Maple Street Park
- Marble Street Park
- South Lee Playground
- Town Farm
- Town Forest/Pinnacle
- Town Soccer Fields

BRPC and the committee assessed sidewalks and curb cuts and the following streets:

- Academy Street
- Center Street
- Consolati Way
- Elm Street
- Ferncliff Avenue
- Franklin Street
- High Street
- Main Street
- Park Street
- Railroad Street
- School Street

Airoidi Building

The town obtained financing to raze the Airoidi Building in the coming months. The evaluation of the building in this report intends to provide recommendations to increase accessibility in the rare event that the town forego the demolition and seek reuse.

The 1977 building is currently in disrepair, is underutilized, and any new or updated ADA accommodations would likely be coupled with significant renovations of the building and spaces.

The Tri-Town Health Department, a regional public health agency, is the only full-time tenant of the building. The Airoidi Building also houses the Veterans of Foreign Wars, the Veterans Services Office, Weights and Measures, office and storage space for the Police Department, and storage for the food pantry.



Priority 1 – Accessible Approach and Entrance

There is adequate parking available in the public parking lot on Railroad Street, but few spaces are designated as accessible. There is one accessible space located in the nearest location to the Airoidi Building but it does not have proper signage as required by 502.6.

502.6 Identification. Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation “van accessible.” Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.

From the parking lot, there is an accessible route to an accessible ramp which follows ADA standards. The entrance to the building is accessible.



The accessible parking space's lines are fading and there is not signage.

There is a sign next to the entrance directing visitors elsewhere for an accessible entrance but there is not an accessible entrance in the direction the sign points. The sign should be removed to avoid confusion.

There is also an accessible entrance on the northeast side of the building and a garage bay on the northwest side of the building, which could be opened to provide easy access to the building. The northwest side of the building also has an accessible parking space, but it is not properly lined.

There are two doors on the northeast side of the building, one of which has change in level above the

1/4 inch maximum as defined in 303.2.

303.2 Vertical. Changes in level of 1/4 inch (6.4 mm) high maximum shall be permitted to be vertical.

Priority 2 – Access to Goods and Services

Tri-town Health Department is the primary service operating in the Airol di Building. Upon entering the building, Tri-Town Health is located to the west. An accessible ramp inside the building eliminates a required step down to the Tri-Town offices.

The office spaces are open and accessible but there are some spaces that would require staff to move furniture around to provide proper travel and turnaround spaces. The fixtures in a laboratory are compliant.

A small kitchen space is accessible except for a paper towel dispenser that is outside of the operable parts reach guidelines outlined in 308.2.1.

308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground.

The rest of the building is mostly navigable. The food pantry kitchen is longer in use and is only used for storage. The items stored in that space restrict movement, rendering that room inaccessible.

Priority 3 – Access to Public Toilet Rooms



The bathrooms are compliant except for exposed pipes in the men's room.

Priority 4 located in the Airol di Building.



The transition into the building from the Railroad Street side is no longer smooth because the outside surface eroded.

There are two public restrooms in the vestibule upon entering the building. Both bathrooms are accessible, with the only non-compliance being that the pipes underneath the toilet in the men's room are exposed, which does not comport with 606.5.

606.5 Exposed Pipes and Surfaces. Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.

Priority 4 – Additional Access

There is a water fountain located in the Food Pantry that is compliant, but it is difficult to reach because furniture blocks the way. There are no other elements the Department of Justice consider under

Town-owned Properties and Facilities

Location	Barrier	Suggested Action	Priority*	Responsibility	Timeframe
All	Multiple Barriers to Access	Proceed with Demolition	High	Town of Lee	6 mo. – 1 year
Parking	Parking Lines Are Faded and There Is No Signage	Repaint Lines and Install Proper Signage.	Low	Town of Lee	If Necessary
Secondary Entrance	The Northern of Two Doors on the Eastern Side of the Building Has a Change In Level	Regrade Exterior Pathway		Town of Lee	If Necessary
Bathrooms	Exposed Pipes in Men's Room	Cover Exposed Pipes.		Town of Lee	If Necessary

Ambulance Garage

Constructed in 1997, the 4,000 square-foot ambulance garage is located next to the Central Fire Station in downtown Lee. The building features offices and a training room on the first floor, an ambulance garage bay in the rear of the building and sleeping quarters for first responders on the second floor.

The building is designed to be accessible, but it is aging. The town plans to demolish the building because of its condition and move the ambulance service to a new public safety building.

Priority 1 – Accessible Approach and Entrance

The building features an accessible ramp to a wide door into the training room. That door, however, is partially blocked with framing which is holding up a piece of the building's roof, rendering the accessible entrance inaccessible.

The parking lot does not have an accessible parking space as required by 208.2. The lot can also service the Central Fire Station.

208.2 Minimum Number. Parking spaces complying with 502 shall be provided in accordance with Table 208.2 except as required by 208.2.1, 208.2.2, and 208.2.3. Where more than one parking facility is provided on a site, the number of accessible spaces provided on the site shall be calculated according to the number of spaces required for each parking facility.



The Ambulance Garage is slated to be razed after construction of a new public safety complex.

Table 208.2 Parking Spaces

Total Number of Parking Spaces Provided in Parking Facility	Minimum Number of Required Accessible Parking Spaces
1 to 25	1
26 to 50	2
51 to 75	3
76 to 100	4
101 to 150	5
151 to 200	6
201 to 300	7
301 to 400	8
401 to 500	9
501 to 1000	2 percent of total
1001 and over	20, plus 1 for each 100, or fraction thereof, over 1000



The accessible door is currently blocked because of construction.

The ramp is properly sloped and follows the handrail requirements. The ramp leads to two doors, one of which requires a step into the building and the other is accessible. There are no signs directing someone to the accessible entrance as required by 216.6.

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.

Priority 2 – Access to Goods and Services

The town does not provide any goods or services on the property.

Inside the building, the first-floor features plenty of room for maneuvering, smooth transitions from room to room, and an accessible kitchen facility.

There is no access to the second floor, which is occupied and used by employees whose essential job functions include walking flights of stairs. Any potential reuse of the property would require the town to install an elevator or lift.

The access from the main entrance to the ambulance bay requires the use of stairs but large garage doors opening to the outside of the building provide reasonable accommodations for someone requiring access to the area.

Priority 3 – Access to Public Toilet Rooms

The first-floor bathrooms follow ADA regulations. The private upstairs bathrooms are not.

Priority 4– Additional Access

The building does not contain any other elements the Department of Justice consider under Priority 4.

Location	Barrier	Suggested Action	Priority*	Responsibility	Timeframe
All	Multiple Barriers to Access	Proceed with Demolition	High	Town of Lee	6 mo. – 1 year
Parking	No Accessible Parking	Install accessible parking space with signage	Low	Town of Lee	If Necessary
Entrance	Accessible Entrance Is Blocked. No Signage Directing Someone to Accessible Entrance	Create New Accessible Entrance Install Proper Signage	Low	Town of Lee	If Necessary
Second Floor Access	No Access to Second Floor	Install Elevator to Provide Additional Service on Second Floor	Low	Town of Lee	If Necessary

Central Fire Station

The Central Fire Station is a historic anchor to downtown Lee. Originally constructed in 1912, the two-story building houses fire apparatuses on the first floor, and offices, dining, and lounge areas on the second.

The building is no longer adequate for modern firefighting equipment due to its size. The town plans to construct a new public safety facility, which would leave the Central Fire Station vacant.

The town recently appointed a re-use committee to help determine the historic building's future. The re-use will likely require renovating the spaces, which should be done in a manner that increases accessibility.

The building provides reasonable accommodation on the first floor and the second floor is only open to employees whose essential job functions require the ability to climb stairs with its current use. For other usages, however, the town's second floor is not accessible.

Priority 1 – Accessible Approach and Entrance

There is no dedicated accessible parking as specified in 208.2. An accessible parking space must be measured and painted to specifications outlined in 502.3.3, located in an area near an accessible route as specified in 502.3, include appropriate signage as defined in 502.6, and located in the nearest accessible entrance as specified in 208.3.1.

208.2 Minimum Number. Parking spaces complying with 502 shall be provided in accordance with Table 208.2 except as required by 208.2.1, 208.2.2, and 208.2.3. Where more than one parking facility is provided on a site, the number of accessible spaces provided on the site shall be calculated according to the number of spaces required for each parking facility.

Table 208.2 Parking Spaces

Total Number of Parking Spaces Provided in Parking Facility	Minimum Number of Required Accessible Parking Spaces
1 to 25	1
26 to 50	2
51 to 75	3
76 to 100	4
101 to 150	5
151 to 200	6
201 to 300	7
301 to 400	8



The Central Fire Station housed the town's fire protection servicers for more than a century.

Table 208.2 Parking Spaces

Total Number of Parking Spaces Provided in Parking Facility	Minimum Number of Required Accessible Parking Spaces
401 to 500	9
501 to 1000	2 percent of total
1001 and over	20, plus 1 for each 100, or fraction thereof, over 1000

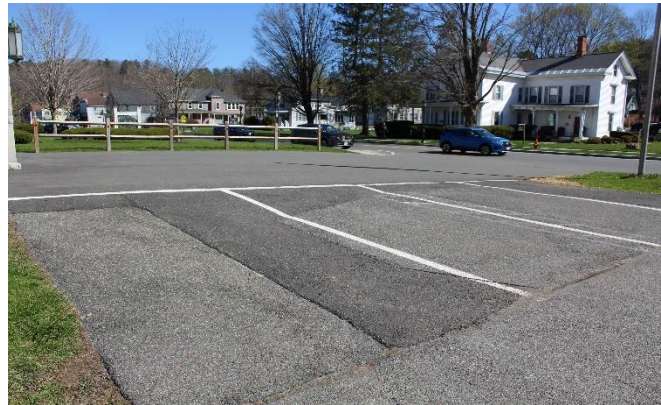
An accessible parking space must be measured and painted to specifications outlined in 502.3.3, located in an area near an accessible route as specified in 502.3, include appropriate signage as defined in 502.6, and located in the nearest accessible entrance as specified in 208.3.1.

After parking in the standard spots provided, people accessing the building have a pathway to the entrance. The main entrance is not accessible because it requires a step up.

There is a rear entrance to the building as well, but it requires the use of stairs.

There are three bay doors with smooth transitions into the building. The town would need to move the fire trucks inside the building to utilize those doors as accessible entrances.

Once someone is upstairs, the kitchen facility, an office, and a lounge are mostly accessible. The basement used for storage is also inaccessible because of a flight of stairs.



There is sufficient space to add accessible parking.

Priority 2 – Access to Goods and Services

The Fire Department does not provide direct services to the public at the building.



There is not much space for maneuvering.

Once someone enters the building, there is limited space to maneuver because of the size of the fire trucks, which narrow travel routes (305.3) and contain protruding objects (307.2). If the trucks are located elsewhere, there is adequate space.

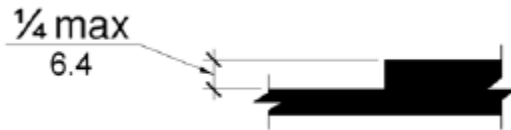
305.3 Size. The clear floor or ground space shall be 30 inches (760 mm) minimum by 48 inches (1220 mm) minimum.

307.2 Protrusion Limits. Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.

There is a back office used for storage that has limited accessibility because of a one-inch change in level, which is out of compliance with 303.2.

303.2 Vertical. Changes in level of 1/4 inch (6.4 mm) high maximum shall be permitted to be vertical.

Figure 303.2



Vertical Change in Level

The second floor requires the use of a set of stairs, rendering the upstairs spaces inaccessible. It features a kitchen and dining area, one office, a bathroom, and a lounge area. The space is used as private quarters for Fire Department staff.

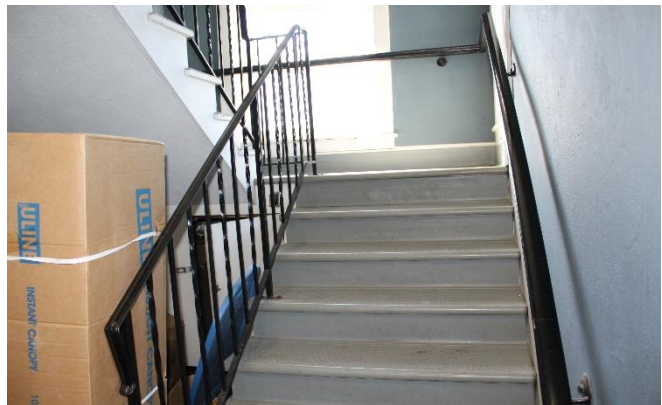
Priority 3 – Access to Public Toilet Rooms

There is no ground floor restroom, and the upstairs restroom is not accessible because it requires an individual to walk up a flight of stairs.

213.1 General. Where toilet facilities and bathing facilities are provided, they shall comply with 213. Where toilet facilities and bathing facilities are provided in facilities permitted by 206.2.3 Exceptions 1 and 2 not to connect stories by an accessible route, toilet facilities and bathing facilities shall be provided on a story connected by an accessible route to an accessible entrance.

The bathroom has a unisex sign on the door, but it is not tactile. Section 703 details the requirements for bathroom signage.

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.



The only access to the second floor is up a staircase.

The signs also need to be located on the latch side of the door as specified in 703.4.2.

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 one active leaf, the sign shall be located on the inactive leaf. Where a tactile sign is provided at double doors with two active leaves, 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 that a clear floor space of 18 inches (455 mm) minimum by 18 inches (455 mm) minimum, centered on the tactile characters, is provided beyond the arc of any door swing between the closed position and 45-degree open position.



The bathroom does not have a tactile or braille sign. The town anticipates that it will demolish the Airolidi Building soon. The town intends to demolish the Airolidi Building in the coming years.

The door opening into the bathroom is one inch too small. Section 404.2.3 requires a minimum width of 32 inches when opened the door is opened at 90 degrees.

404.2.3 Clear Width. Door openings shall provide a clear width of 32 inches (815 mm) minimum. Clear openings of doorways with swinging doors shall be measured between the face of the door and the stop, with the door open 90 degrees. Openings more than 24 inches (610 mm) deep shall provide a clear opening of 36 inches (915 mm) minimum. There shall be no projections into the required clear opening width lower than 34 inches (865 mm) above the finish floor or ground. Projections into the clear opening width between 34 inches (865 mm) and 80 inches (2030 mm) above the finish floor or ground shall not exceed 4 inches (100 mm).

The door handle requires a right grasp, which is not compliant with 404.2.7.

404.2.7 Door and Gate Hardware. Handles, pulls, latches, locks, and other operable parts on doors and gates shall comply with 309.4. 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.



The sink is too high.

The sink measures 36.5 inches from the ground, which exceeds the 34-inch maximum as prescribed in 606.3.

606.3 Height. Lavatories and sinks shall be installed with the front of the higher of the rim or counter surface 34 inches (865 mm) maximum above the finish floor or ground.

The mirror is approximately 52-inches high, which is out of compliance with 603.3.

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.

The operable parts, the soap and paper towel dispensers, are also placed out of reach.

308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground.

There are no grab bars provided as required by 604.8.2.3 and 604.9.7 and specified in 609.

604.8.2.3 Grab Bars. Grab bars shall comply with 609. A sidewall grab bar complying with 604.5.1 shall be provided on both sides of the compartment.

604.9.7 Toilet Compartments. Toilet compartments shall comply with 604.8.

Priority 4- Additional Access

The Fire Station does not have any additional features such as water fountains or phones that the Department of Justice assesses under Priority 4.

Location	Barrier	Suggested Action	Priority*	Responsibility	Timeframe
Parking	No Accessible Parking	Install Accessible Parking	Low	Town of Lee	TBD
Accessible Routes	Multiple areas with Less than 36-inches of Maneuverable Spaces The Building has Changes in Levels Above ¼ Inch	Maintain an Accessible Pathway Through the Building Install transition strips as needed.	Low	Town of Lee	TBD
Second Floor	No Access to the Second Floor	Install Elevator if the town plans to utilize the upstairs for the public	Low	Town of Lee	TBD
Bathroom	Improper Signage Mirrors Too High Door Too Narrow Operable Parts Are Not Compliant. Sink Too High No Grab Bars	Install Tactile Signage On the Latch Side of the Door. Lower Mirror Replace Door and Frame Replace doorknob Replace Sink Install Grab bars.	Low	Town of Lee	TBD

DPW Garage and Storage Shed

The DPW maintains two buildings, a garage and a storage shed, on Railroad Street. The town intends to to raze both structures within the next six months and rebuild on a different parcel on Pleasant Street. The buildings are not accessed by the public.

Priority 1 – Accessible Approach and Entrance

There is no parking directly on site. The parking is in a municipal parking lot, which has an inadequate number of designated accessible parking spaces.

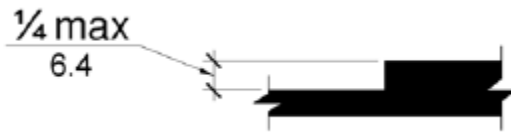
There is a flat and paved surface connecting the parking lot to the building. The garage has large doors that can be opened to make reasonable accommodation. Next to the garage door, there is a smaller pedestrian entrance but there is a change in level, which is not aligned with 303.2.



The DPW garage is accessible.

303.2 Vertical. Changes in level of 1/4 inch (6.4 mm) high maximum shall be permitted to be vertical.

Figure 303.2
Vertical Change in Level



The storage shed is accessible through a large garage door.

Priority 2 – Access to Goods and Services



Cracks in the floor in the basement can be a barrier.

The DPW does not offer any public services at its location. The garage and storage shed are mostly open space for vehicles and material, which can be moved to provide reasonable accommodation.

Priority 3 – Access to Public Toilet Rooms

There are no public bathrooms available at the DPW property.

The bathrooms provided for employees are not accessible. Entrance to the bathrooms is limited by a change in level above the 1/4 inch maximum as defined in 303.2.

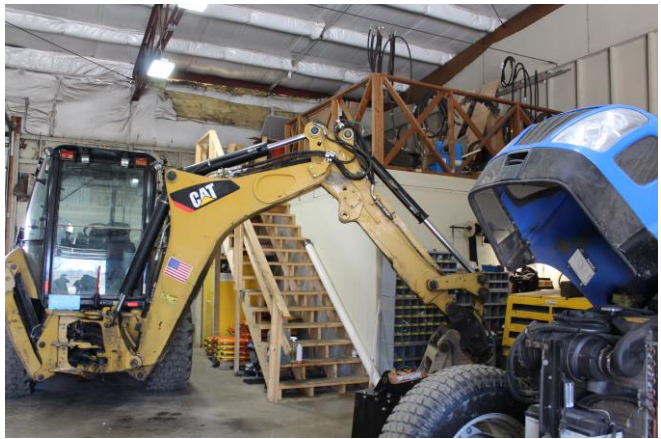
The bathrooms do not have any ADA compliant features and there is limited turnaround space. The bathrooms could not be ADA compliant without a significant renovation.

Priority 4- Additional Access

The DPW garage does not provide any additional access.



The shed is used to store vehicles.



Equipment can be moved to provide open space if needed.

Location	Barrier	Suggested Action	Priority*	Responsibility	Timeframe
All Accessibility Barriers	Multiple Accessibility Barriers	Proceed with Demolition	High	Town of Lee	6 mo – 1 Year
Entrance Door	Requires a Step Up	Add Transition Strip	Low	Town of Lee	If Necessary
Non-Compliant Bathrooms	The Bathrooms are Not Accessible.	Renovate Bathroom	Low	Town of Lee	If Necessary

Library

The Library is a historic building dating back to 1907 and subsequently expanded upon in 1977. It features two floors, with one floor of public space and a basement used for storage.

Priority 1 – Accessible Approach and Entrance

Patrons have two ways to access the building. The parking lot abuts the 1977 addition with an accessible parking space as close to the entrance as possible.

The parking space is adequately spaced on both sides and there is appropriate signage.

From the parking lot, patrons can utilize an accessible ramp to the entrance or opt to use one of two sets of stairs. There is no automatic door opener, but the hardware complies.

The town could increase accessibility by installing a push-button door opener.

The original door requires someone to climb stairs to access it. There is no sign directing patrons to the accessible entrance near the parking lot. The town should install signage near the front entrance to meet standard 216.6.

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.

Priority 2 – Access to Goods and Services

Throughout the building, most of the doors feature handles, which require patrons to grasp tightly and twist their wrists, which is not in compliance with 309.4.



The historic Lee Library is located in the downtown.



The accessible ramp complies with ADA requirements.



The town previously added a compliant handle to the front door to increase accessibility.

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.

A large open space in the library features bookshelves, sitting areas, and catalogue computer access. The shelves are appropriately spaced, providing people ample room to maneuver. Two doors from that area allows patrons to enter the children's library space. The children's space is ADA compliant.

Patrons access services at the checkout desk. The desk features two heights, one to provide patrons with disabilities with the same level of service as the other desk.

The book stacks are appropriately spaced and there is sufficient room for maneuverability in all other spaces.

There is one fire door exiting the building from the main section of the library but there is an immediate step down in level and is not usable for many people with disabilities. There is only one accessible means of egress.

The director's office is located in the southern portion of the building. There are items stored in the area as well as protruding furniture which could be moved if needed. The light switches, two, are both out of compliance with 308.2.1.

308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground.

The basement is mostly used for storage. There is a small utility room providing access to electrical and heating infrastructure. There is no access to the basement that does not require stairs, rendering the basement inaccessible.

The utility space provides very little room to maneuver once accessed but furniture and stored items could be moved to provide additional space. The doorways are 32 inches, and the doors are light enough.



While still in compliance, a small lip is forming on the ADA ramp which the town should monitor.



The counter is compliant.



The change in level makes it difficult for someone to maneuver from one room to another in the basement.

The basement's storage areas are broken into four sections. The amount of furniture and items stored renders most of the area inaccessible due to lack of turnaround locations.

Two narrow entrances provide an opportunity for employees – the space is not available for the public – to move from the south side to the north. However, there are short slopes that are not compliant with 403.3.

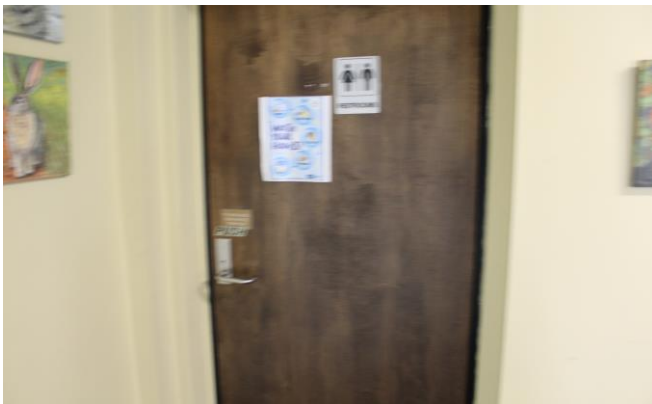
403.3 Slope. The running slope of walking surfaces shall not be steeper than 1:20. The cross slope of walking surfaces shall not be steeper than 1:48.

Further, one of the transitions protrudes above ¼ inch as defined in 303.

303.2 Vertical. Changes in level of 1/4 inch (6.4 mm) high maximum shall be permitted to be vertical.

Priority 3 – Access to Public Toilet Rooms

Upon entering the library, patrons are able to quickly turn left into an open room without any difficulty or turn right into the main portion of the building. There are two unisex bathrooms, separated by an accessible water fountain, near the accessible entrance.



The bathrooms are not appropriately signed.



There are exposed pipes that should be covered.

The doors to the bathroom are too heavy, requiring patrons to utilize approximately 9 lbs. of pressure to open, which is above standards established in 404.2.9.

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.

The bathroom's signage is not tactile, placed too high, and is not located on the latch side of the door as specified in Section 703.

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.

The signs also need to be located on the latch side of the door as specified in 703.4.2.

The bathrooms are accessible, including a compliant turnaround area, grab bars, faucet hardware, and dispensers.



The staff bathroom is too narrow to comply with ADA standards.

There is sufficient space, approximately 12 inches, from the pipes to the edge of the sink. However, the water supply and drainpipes are exposed, which is not in conformity with 606.5.

606.5 Exposed Pipes and Surfaces. Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.

A staff bathroom is also available on the first floor. The bathroom is too narrow for accessibility as outlined in 403.

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 approaching the turn, 48 inches (1220 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.

The bathroom also features exposed pipes (606.5). The toilet does not feature grab bars and the paper towel dispenser is too high off the wall (604.7). The bathroom compliance details are outlined in Section 603 and 604.

However, staff needing accessibility do have the option of utilizing the public bathrooms.

Priority 4– Additional Access

The library features an ADA accessible water fountain but does not have any additional elements the Department of Justice considers under Priority 4.



The library stacks are adequately spaced.



The accessible parking is properly signed and located.

Town-owned Properties and Facilities

Location	Barrier	Suggested Action	Priority*	Responsibility	Timeframe
Accessible Entrance	No Push Button Door	Install Push Button Door	Medium	Town of Lee	3-5 Years
First Floor Public Bathrooms	Door Too Heavy	Replace Door	High	Town of Lee	1-2 Years
First Floor Public Bathrooms	Non-Compliant Signage	Replace Signage	High	Town of Lee	1-2 Years
First Floor Public Bathrooms	Exposed Pipes	Cover Water and Drainage Pipes	High	Town of Lee	1-2 Years
Director's Office	Light Switches Too High	Lower Switches	Low	Town of Lee	5+ Years
Front Entrance	No Signage to Accessible Entrance	Add Appropriate Signage	High	Town of Lee	1-2 Years
Basement	Basement Is No Accessible	Renovate Basement for Re-Use	Low	Town of Lee	5+ Years
Door Handles Throughout the Building	Nearly All Doors Have Non-Compliant Operatable Parts.	Replace Doorknobs	High	Town of Lee	1-2 Years

Police Department

The Police Department offices are located on the first floor of the Town Hall and the holding cells, plus one additional office, are in the basement.

The town anticipates that the office on the first floor will be reused when the Police Department moves to a new facility. The town does not expect to reuse the basement for anything other than storage. However, this report did evaluate the basement should a different re-use option avail itself.

Priority 1 – Accessible Approach and Entrance

The door to the first-floor office is too heavy. The 2010 ADA Standards 404.2.9 establishes the appropriate level of force someone must utilize to open the door at five pounds of pressure.



After entering the Police Department, patrons are immediately met by a counter. There is not enough room for someone to close the door and turn around.

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.

Priority 2 – Access to Goods and Services

Upon entering the office, patrons are immediately met with a counter. The counter is an appropriate height. However, there is no space for someone in a wheelchair to turn around. The standards establish minimum clearance space for maneuverability in 404.2.4.2.

404.2.4.2 Doorways without Doors or Gates, Sliding Doors, and Folding Doors. Doorways less than 36 inches (915 mm) wide without doors or gates, sliding doors, or folding doors shall have maneuvering clearances complying with Table 404.2.4.2.

Table 404.2.4.2 Maneuvering Clearances at Doorways without Doors or Gates, Manual Sliding Doors, and Manual Folding Doors

Approach Direction	Minimum Maneuvering Clearance: Perpendicular to Doorway	Minimum Maneuvering Clearance: Parallel to Doorway (beyond stop/latch side unless noted)
From Front	48 inches (1220 mm)	0 inches (0 mm)
From side (Doorway with no door only.)	42 inches (1065 mm)	0 inches (0 mm)
From pocket/hinge side	42 inches (1065 mm)	22 inches (560 mm) (Beyond pocket/hinge side.)

Table 404.2.4.2 Maneuvering Clearances at Doorways without Doors or Gates, Manual Sliding Doors, and Manual Folding Doors

Approach Direction	Minimum Maneuvering Clearance: Perpendicular to Doorway	Minimum Maneuvering Clearance: Parallel to Doorway (beyond stop/latch side unless noted)
From stop/latch side	42 inches (1065 mm)	24 inches (610 mm)

The offices inside the Police Department's first-floor space are ADA compliant.

The basement area features locker rooms, one office, and holding cells. The officers utilize an ADA accessible elevator to obtain access to the basement. There is no public access to that portion of the building.

The cells are compliant. The booking table is 40 inches high, which is complaint. The locker rooms and sergeant's offices are not compliant because they do not have enough space for someone in a wheelchair to turn around as required by 304.3.1 and 304.3.2.



Cracks in the floor in the basement can be a barrier.

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.

The bathrooms inside the locker rooms do not comply with Section 213.



The holding cells comply with ADA standards.

However, those spaces are also only accessible to sworn police officers who must pass physical standards that ensure they can navigate those spaces.

The hallway to the booking room and holding cells has cracks, which can trip up someone with limited mobility or difficult seeing. The ADA standards require floors to be firm and slip-resistant and that there are no changes in level beyond 1/4 of an inch. At the end of a hallway currently used to house custodian equipment, there are broken tiles to the exit, creating a difficult transition.

303.2 Vertical. Changes in level of 1/4 inch (6.4 mm) high maximum shall be permitted to be vertical.

Priority 3 – Access to Public Toilet Rooms

There are no public toilet rooms for the Police Department. Visitors utilize the public restrooms in the Town Hall.

Priority 4– Additional Access

There are no elements in the Police Station that the Department of Justice assesses under Priority 4.



The hallways are cramped and do not allow someone in a wheelchair to turnaround. The floor features multiple broken tiles.



The locker rooms are narrow, but anyone authorized to access them must comply with physical standards to become a police officer.

Location	Barrier	Suggested Action	Priority*	Responsibility	Timeframe
First Floor Office Entrance	Insufficient Maneuvering Space.	Move Desk Further from the Floor.	Medium	Town of Lee	3-5 Years
Basement Floors	Cracked Floor Tiles	Replace Cracked Tiles	Low	Town of Lee	5+ Years
Locker Rooms	Locker Rooms are Out of Compliance	Renovate or Build New Locker Rooms	Low	Town of Lee	5+ Years

South Lee Fire Station

The South Lee Fire Station is a single-story building located on Church Street. The town constructed the station in 1959 to serve the neighborhoods in South Lee. Today, the building is shared by the U.S. Postal Service, which occupies a portion of the 2,700 square-foot building.

The Fire Department utilizes approximately half of the building, which includes a large garage bay to store vehicles, a conference area, and two bathrooms. The South Street Fire Station is not accessible.



The South Lee Fire Station shares its building with the United States Postal Service.

Priority 1 – Accessible Approach and Entrance

The parking lot features one accessible parking spot, located near an accessible ramp into the Post Office, complying with the parking space standards outlined in 208.2.

The 2010 ADA Standards do not require van accessibility for a parking lot the size of the South Lee Fire Station but there is sufficient space to widen and paint the current accessible spot to accommodate van accessibility.

The paint in the current spot is faded and needs repainting. The sign is no longer upright and is at the required height defined in 502.6.



The paint and signage for the accessible parking is faded. There is also sufficient space to turn the spot to be van accessible.

502.6 Identification. Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.

The ADA accessible entrance provides access to the Post Office and there is an interior door providing passage to the Fire Department. The Post Office must provide that access,

The building has three additional entrances to the building but none of them provide proper signage indicating where the accessible entrance is located, as directed by 216.6.



There are no signs indicating that there is an accessible entrance on the side of the building.

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.

Two of the three other entrances require stairs to access and are not accessible. A third route into the building is through the large garage door in front of the building. The trucks inside the garage bay would need to be moved prior to accessing to provide a 36-inch route through the building as required by 403.5.1. The slope is slightly too steep in some portions of the driveway from the road into the

building as described in 402.2.

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.

Priority 2 – Access to Goods and Services

The Fire Department does not provide any goods or services from the South Lee Fire Station. Inside the building, there is sufficient room in the bay, especially when the trucks are not parked there, and in the conference area to provide services.

Moving throughout the building can be a challenge because all doors, except those for the bathrooms, utilize knobs which are not compliant with 309.4.

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.

Priority 3 – Access to Public Toilet Rooms

The building features two bathrooms that are not accessible. The doors are too small, measuring 30 ½ inches wide which is under the 32-inch minimum established in 404.2.3.

404.2.3 Clear Width. Door openings shall provide a clear width of 32 inches (815 mm) minimum. Clear openings of doorways with swinging doors shall be measured between the face of the door and the stop, with the door open 90 degrees. Openings more than 24 inches (610 mm) deep shall provide a clear opening of 36 inches (915



The bathrooms lack proper signage.

mm) minimum. There shall be no projections into the required clear opening width lower than 34 inches (865 mm) above the finish floor or ground. Projections into the clear opening width between 34 inches (865 mm) and 80 inches (2030 mm) above the finish floor or ground shall not exceed 4 inches (100 mm).

There is no tactile signage, located on the latch side of the door, and at the proper height as specified in 703.4.1, and 703.4.2.

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.

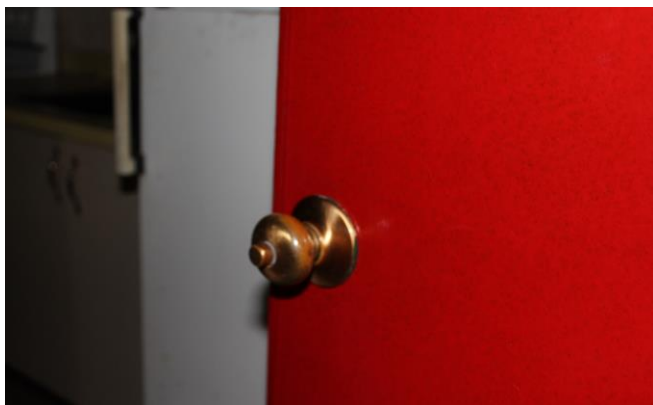
703.4.2 Location. Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side. Where a tactile sign is provided at double doors with one active leaf, the sign shall be located on the inactive leaf. Where a tactile sign is provided at double doors with two active leaves, 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 that a clear floor space of 18 inches (455 mm) minimum by 18 inches (455 mm) minimum, centered on the tactile characters, is provided beyond the arc of any door swing between the closed position and 45-degree open position.

The doors have proper accessible handles and the bathrooms have grab bars. The sink has exposed pipes, which are not in compliance with 606.5.

606.5 Exposed Pipes and Surfaces. Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.



There are exposed pipes under the bathroom sink.



Doorknobs throughout the building limit access from room to room.

The paper towel dispenser is out of reach, measuring approximately 52 inches from the ground, which is above the 48-inch threshold outlined in 308.2.

308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground.

The building also features a utility sink in the garage bay area and a kitchen area. The utility sink is accessible, but the kitchen sink is not accessible because it does not have the proper knee and toe



The sink is not equipped with the appropriate operable parts.

clearances outlined in 306 and the noncompliant handles as outlined in 309.4.

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.

306.3.3 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.

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.

Priority 4– Additional Access

The South Lee Fire Department does not feature any additional elements the Department of Justice evaluates under Priority 4.

Location	Barrier	Suggested Action	Priority*	Responsibility	Timeframe
Parking	Lines are Fading and Sign Is Falling	Repaint Parking Spot, Reinstall Sign	High	Town of Lee	1-2 Years
	No Van Accessibility	Paint Lines and Install Proper Signage to Signify Van Accessibility Parking			
	No Sign Directing Visitors to the Accessible Entrance	Install Signages at Non-Accessible Entrances Directing Visitors to the Accessible Entrance			
Bathrooms	Multiple Compliance Issues	Renovate Bathrooms	Low	Town of Lee	5+ Years
Kitchen	Non-Compliant Handles on Sink	Install Faucet That Does Not Require One to Grip the Handles	Low	Town of Lee	5+ Years

Town Hall



Town Hall is home to numerous municipal offices, meeting space, and the Police Department.

The 10,000 square foot Memorial Hall dates back to 1874. It is the oldest town-owned building in use and houses the town's meeting room, multiple departmental offices, and the Police Department.

Voters approved building a new public safety complex and the Police Department will move into that space once constructed. The town will consider its options to reuse the basement and first-floor office currently housing the Police Department.

Priority 1 – Accessible Approach and Entrance

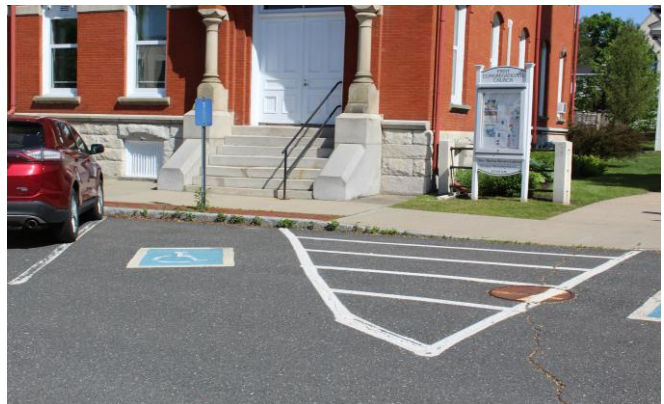
There is a public parking lot serving the town hall and other nearby downtown buildings. The lot has the appropriate number of dedicated accessible parking spaces with van access. The signage for those spaces is below the required 60 inches as specified in 502.6. The signs are also fading and need to be replaced soon.

502.6 Identification. Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.

The spots are not the closest to the accessible route inside the building. However, the spaces are closest to the accessible route to the church next door. The ground is firm and slip resistant and there is an accessible path to the accessible entrance to the Town Hall.

The spaces are located next to an inaccessible entrance. There is no signage directing people to the accessible entrance as required by 216.6.

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.



There are two accessible parking spaces at Town Hall.

The front entrance is accessible. It features an automatic door opener that complies.

Priority 2 – Access to Goods and Services

Upon entering the building, someone can either a staircase or an accessible entrance to obtain all services. The hallways and rooms are adequately spaced for maneuverability, though some offices would require the town to move or replace furniture to accommodate.

The offices all have tactile and braille signage at various heights, all of which are below the 60-inch maximum. Throughout the building, interior doors to offices exceed the maximum of 5 lbs. of pressure, which is out of compliance with 404.2.9.



Both bathrooms have exposed pipes under the sink.

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.

Priority 3 – Access to Public Toilet Rooms

The town has public bathrooms available on the first floor and private bathrooms on the second floor. Both bathrooms are mostly accessible. However, there are exposed pipes under the sink which is not in compliance with 606.5.

606.5 Exposed Pipes and Surfaces. Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.

Priority 4– Additional Access

Town Hall has an ADA compliant water fountain.

Location	Barrier	Suggested Action	Priority*	Responsibility	Timeframe
Parking	Signage is Fading and Too Low	Replace Signage	High	Town of Lee	1-2 Years
	No Sign Indicating Where Accessible Entrance is Located				
Access	Interior Doors Are Too Heavy	Loosen Door Mechanisms or Replace Doors	High	Town of Lee	1-2 Years
Bathrooms	Exposed Pipes Under Sink	Insulate Exposed Pipes	High	Town of Lee	1-2 Years

Wastewater Treatment Plant

The Wastewater Treatment Plant consists of two buildings, an operations building and a dewatering plant, accounting for approximately 5,300 square feet. The complex is the most recently constructed town-owned property.

Overall, the buildings are accessible, and most areas of noncompliance are exempt.

Priority 1 – Accessible Approach and Entrance

There is no designated accessible parking. There are only a few parking spaces provided at the facility and none are marked for accessibility as required by 208.2.



The tanks are not accessible because they require stairs to access but are exempt from the standards under 203.3.

208.2 Minimum Number. Parking spaces complying with 502 shall be provided in accordance with Table 208.2 except as required by 208.2.1, 208.2.2, and 208.2.3. Where more than one parking facility is provided on a site, the number of accessible spaces provided on the site shall be calculated according to the number of spaces required for each parking facility.

The building can share parking with the town's soccer fields.

There is an accessible path from the parking lot to the main entrances. The parking lot is also paved to the rear of the building, providing an accessible route and sufficient area to park near the dewatering plant. The main entrance is accessible but could benefit from an automatic door opener.

Priority 2 – Access to Goods and Services

The town does not provide any goods or services at the facility. However, the director's office is accessible and located close to the entrance for atypical needs.



The entrance is accessible.

The hallways throughout the building are wide and rooms are appropriately signed with braille.

Many of the interior doors are too heavy, requiring approximately 7 lbs. of pressure to open, which is above the 5 lbs. standard established in 404.2.9.

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.



The plant has appropriate signage.

The basement area of the dewatering plant is not accessible because it requires climbing a set of stairs. There is also a confined space accessible only by ladder. Both are exempt from compliance as outlined in 203.4 and 203.5.

203.4 Limited Access Spaces. Spaces accessed only by ladders, catwalks, crawl spaces, or very narrow passageways shall not be required to comply with these requirements or to be on an accessible route.

203.5 Machinery Spaces. Spaces frequented only by service personnel for maintenance, repair, or occasional monitoring of equipment shall not be required to comply with these requirements or to

be on an accessible route. Machinery spaces include, but are not limited to, elevator pits or elevator penthouses; mechanical, electrical or communications equipment rooms; piping or equipment catwalks; water or sewage treatment pump rooms and stations; electric substations and transformer vaults; and highway and tunnel utility facilities.

Priority 3 – Access to Public Toilet Rooms

The restrooms are in the operations building and are ADA compliant.

Priority 4– Additional Access

The plant has an ADA accessible water fountain, located in the operations building and along an accessible route. The complex does not have any additional elements the Department of Justice evaluates under Priority 4.

Location	Barrier	Suggested Action	Priority*	Responsibility	Timeframe
Parking	No Accessible Parking	Install Accessible Parking Space with Signage	Medium	Town of Lee	3-5 Years
Access	Interior Doors Are Too Heavy	Loosen Door Mechanisms or Replace Doors	Low	Town of Lee	5+ Years

Water Plant



The Water Plant is not utilized by the general public.

The 4,000 square-foot water treatment plant is located on Reservoir Road. Access to the building is limited to employees, with a gate located at the base of the driveway preventing unauthorized access.

The plant consists of a one-story building and water tanks.

Priority 1 – Accessible Approach and Entrance

There is no designated accessible parking. There are only a few parking spaces, and none are marked for accessibility as required by 208.2.

208.2 Minimum Number. Parking spaces complying with 502 shall be provided in accordance with Table 208.2 except as required by 208.2.1, 208.2.2, and 208.2.3. Where more than one parking facility is provided on a site, the number of accessible spaces provided on the site shall be calculated according to the number of spaces required for each parking facility.

The parking lot is paved but access to the building requires either a step up or climbing a small ramp. The ramps are not designed for ADA compliance, do not feature handrails, and are too steep. The ramps measure slopes of 15% and 11%, which are above the 8.33% standard as outlined in 405.2.

405.2 Slope. Ramp runs shall have a running slope not steeper than 1:12.

Priority 2 – Access to Goods and Services

The town does not provide any goods or services at the facility.

There is adequate space and an accessible path to get to the office if needed. The interior doors throughout the building are too heavy, requiring someone to utilize approximately 10 lbs. of pressure to open, which is above the thresholds established in 404.2.9.

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.



The building is not accessible.

The equipment inside the building is somewhat accessible. The storage spaces are located on the ground floor and there is a ramp to access some equipment. However, other areas require the use of stairs.

Those spaces are exempt from compliance according to 203.5.

203.5 Machinery Spaces. Spaces frequented only by service personnel for maintenance, repair, or occasional monitoring of equipment shall not be required to comply with these requirements or to be on an accessible route. Machinery spaces include, but are not limited to, elevator pits or elevator penthouses; mechanical, electrical or communications equipment rooms; piping or equipment catwalks; water or sewage treatment pump rooms and stations; electric substations and transformer vaults; and highway and tunnel utility facilities.



Most of the interior is accessible or the town could make reasonable accommodations should it need to increase accessibility.

Priority 3 – Access to Public Toilet Rooms

The building is not open to the public. The restroom on site is not accessible.

The signage is not tactile or in braille and is not located on the latch side of the door, as detailed in 703.

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.

The door is too heavy, requiring someone to utilize approximately 10 lbs. of pressure to open, which is above the threshold established in 404.2.9.

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

The piping for the sink is not insulated to protect against contact as defined in 606.5.

606.5 Exposed Pipes and Surfaces. Water supply and drainpipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.



The bathroom does not have appropriate signage.

There are no grab bars, which are not required because of the current use of the building but could be added to increase accessibility.

Priority 4- Additional Access

The plant does not feature any elements considered under Priority 4.

Location	Barrier	Suggested Action	Priority*	Responsibility	Timeframe
Parking	No Parking	Install Accessible Parking space	Low	Town of Lee	5+ Years
Access	Interior Doors Are Too Heavy	Loosen Door Mechanisms or Replace Doors.	Low	Town of Lee	5+ Years
Restroom	Exposed Pipes under Sink	Insulate Pipes	Low	Town of Lee	5+ Years
	Incorrect Signage	Install new signage			

Parks and Open Spaces

Athletic Field

The Lee Athletic Field is located off Route 20 and features open space, basketball and tennis courts, playgrounds, skate elements, a pavilion, and river access. The park is owned by the town, maintained by the Department of Public Works, and supported by the Lee Youth Commission.

The town prioritizes the Athletic Field when adding accessible features to its parks system. The state scheduled a future bicycle path extension into the park, which will provide accessible routes to the rear of the property.

The park has limited parking and there are no spaces dedicated accessible parking, which is not in compliance with Section 208. The town should dedicate a space in the parking area to accommodate a person with disabilities, install an accessible parking sign, and properly line it to prevent others from parking in the space.



The town added numerous accessibility features to the Athletic field in recent years.

208.2 Minimum Number. Parking spaces complying with 502 shall be provided in accordance with Table 208.2 except as required by 208.2.1, 208.2.2, and 208.2.3. Where more than one parking facility is provided on a site, the number of accessible spaces provided on the site shall be calculated according to the number of spaces required for each parking facility.

Table 208.2 Parking Spaces

Total Number of Parking Spaces Provided in Parking Facility	Minimum Number of Required Accessible Parking Spaces
1 to 25	1
26 to 50	2
51 to 75	3
76 to 100	4
101 to 150	5
151 to 200	6
201 to 300	7
301 to 400	8
401 to 500	9
501 to 1000	2 percent of total
1001 and over	20, plus 1 for each 100, or fraction thereof, over 1000

The town provides an accessible portable bathroom, which is located along an accessible route in and out of the park.

A 2015 evaluation of its Open Space and Recreation properties conducted by the Berkshire Regional Planning Commission noted that the entrance to the park was too narrow and since then the town installed a new accessible gate. From the entrance, a paved and level walkway provides access to the basketball and tennis courts. The walkway does not extend beyond the courts. There is no accessible path to any of the other elements of the park.

The pavilion now has accessible benches, which in the previous evaluation, it did not. The town installed a transition from the grass to the playground, eliminating a barrier to access for a person with a disability.

Since the prior evaluation, the town leveled the ground and installed safety material. The town also installed an adaptive swing. The town should continue to phase in accessible elements to its playground, including accessible paths to and onto playground elements. The park provides access to the river at the westernmost side of the property. The town did not install facilities but there is signage and a small path between the grass and the river for fishing access. If the town opts to further develop the river access, BRPC recommends that it includes installing fishing equipment that is ADA accessible.



A transition to the playground allows for greater access.



The pavilion features ADA accessible tables.

Location	Barrier	Suggested Action	Priority*	Responsibility	Timeframe
Parking	No Accessible Parking	Install Accessible Parking	High	Town of Lee	1-2 Years
Picnic Facilities	Picnic Tables Are on Grass	Install Accessible Path to Picnic Area	Medium	Town of Lee	With Bike Path Extension
Fishing Area	No Accessible Path to Fishing Area	Install Accessible Path to Fishing Area	Medium	Town of Lee	With Bike Path Extension

Bradley Street Playground

The Bradley Street Playground is a small neighborhood park. It features a basketball court, benches and tables, and a playground.

There is no dedicated accessible parking, all parking is on the street and there are no lines delineating spaces. The town should line an accessible space near the entrance to the park and sign it appropriately. A grass transition area is between the entrance gate and the street. Section 208.2 of the 2010 ADA Standards requires all facilities to have at least one accessible parking space.



The Bradley Street Playground is a small neighborhood park.

208.2 Minimum Number. Parking spaces complying with 502 shall be provided in accordance with Table 208.2 except as required by 208.2.1, 208.2.2, and 208.2.3. Where more than one parking facility is provided on a site, the number of accessible spaces provided on the site shall be calculated according to the number of spaces required for each parking facility.

Table 208.2 Parking Spaces

Total Number of Parking Spaces Provided in Parking Facility	Minimum Number of Required Accessible Parking Spaces
1 to 25	1
26 to 50	2
51 to 75	3
76 to 100	4
101 to 150	5
151 to 200	6
201 to 300	7
301 to 400	8
401 to 500	9
501 to 1000	2 percent of total
1001 and over	20, plus 1 for each 100, or fraction thereof, over 1000

The town should create a pathway that is firm and slip resistant from the street to the inside of the park. There is no pathway between elements. The park is mostly grass, which is not slip-resistant. The basketball court is smooth and hard but no other areas in the park have a firm surface.

The town should add a path throughout the elements in accordance with Section 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.

The town should consider adding ADA accessible equipment, such as an ADA accessible swing to the existing swing set.



The park features a mix of playground elements.



There is no accessible pathway through the park.

Location	Barrier	Suggested Action	Priority*	Responsibility	Timeframe
Parking	No Accessible Parking	Install At Least One Accessible Parking Spot	Low	Town of Lee	5+ Years
Accessible Routes	No Accessible Routes	Install Accessible Route	Low	Town of Lee	5+ Years
Playground	Few Accessible Playground Features	Install Additional ADA Elements	Low	Town of Lee	5+ Years

Dunn Park

Dunn Park is a protected open space overseen by the Conservation Commission.

The public has access to the land but there is no dedicated signage, parking, or other elements welcoming residents to use the space.

The park has wetland limitations that development of the property.

The town should be thoughtful about any future development and ensure that any additions to the park are ADA compliant and promote inclusion.



Dunn Park is not developed.

Location	Barrier	Suggested Action	Priority*	Responsibility	Timeframe
Undeveloped Land	No ADA Amenities	Ensure Potential Changes to Park Are ADA Compliant	Low	Town of Lee	5+ Years

East Lee Park

East Lee Park is a neighborhood park with conditions similar to the Bradley Street Playground. East Lee Park has a parking lot with adequate parking but none of the spots are designed for accessibility. The town should install parking in the lot to conform with Section 208.2.

208.2 Minimum Number. Parking spaces complying with 502 shall be provided in accordance with Table 208.2 except as required by 208.2.1, 208.2.2, and 208.2.3. Where more than one parking facility is provided on a site, the number of accessible spaces provided on the site shall be calculated according to the number of spaces required for each parking facility.



The East Lee Playground is a neighborhood park.

Table 208.2 Parking Spaces

Total Number of Parking Spaces Provided in Parking Facility	Minimum Number of Required Accessible Parking Spaces
1 to 25	1
26 to 50	2
51 to 75	3
76 to 100	4
101 to 150	5
151 to 200	6
201 to 300	7
301 to 400	8
401 to 500	9
501 to 1000	2 percent of total
1001 and over	20, plus 1 for each 100, or fraction thereof, over 1000

The town did install new ADA accessible playground elements, including safety material underneath and created an appropriately slopped accessible route to the elements. However, there is no firm, slip-resistant pathway from the entrance to the elements or from element to element as defined in 206.2.1.

206.2.1 Site Arrival Points. At least one accessible route shall be provided within the site from accessible parking spaces and accessible passenger loading zones; public streets and sidewalks; and public transportation stops to the accessible building or facility entrance they serve.

There are ballfields located at the rear of the property but there is no spectator seating available nor is there an accessible path to the field. There are tables and benches available and there are enough of them that are accessible for people in a wheelchair.



The park features a mix of playground elements.



There is no accessible pathway through the park.

Location	Barrier	Suggested Action	Priority*	Responsibility	Timeframe
Parking	No Accessible Parking	Install At Least One Accessible Parking Spot	Low	Town of Lee	5+ Years
Access	No Accessible Route Through Property	Install Accessible Path	Low	Town of Lee	5+ Years

Edith Wharton Conservation Area

The town and the neighboring community of Lenox jointly own the Edith Wharton Conservation Area. It is deed-restricted conservation land providing residents with hiking, walking, and fishing access.

The property provides access to Laurel Lake and nearby wooded areas. The town has not developed the property.

The town should consider adding d accessible parking near the property and, in the future, consider creating accessible trails throughout to provide people with disabilities with the same access to the space.



The town has not developed the property.

Location	Barrier	Suggested Action	Priority*	Responsibility	Timeframe
Undeveloped Conservation Land.	No ADA Accommodations	Add Other Accommodations in Concert with Any Future Development	Low	Conservation Commission	5+ Years

Ferncliff Reservation

The Ferncliff Reservation features hiking trails with scenic views of the downtown and has historic significance. There are multiple access points to the property.

There is accessible parking at the Crossways Village access point. The park features a ball field with a portable toilet. There is no spectator seating or other amenities.

Access to the property is steep and there is no accessible route into the property, which does not comply with 206.2.1. The terrain, however, poses some significant challenges to developing an accessible path that meets accessible slopes.



The property features hiking trails and scenic views.

206.2.1 Site Arrival Points. At least one accessible route shall be provided within the site from accessible parking spaces and accessible passenger loading zones; public streets and sidewalks; and public transportation stops to the accessible building or facility entrance they serve.

The trail system is rocky, narrow in places, and does not feature any ADA accommodations.

The town should keep ADA accessibility in mind if it develops the property, including adding ADA compliant benches and tables, creating a path made from firm and slip-proof material, to provide access and developing a trail with appropriate steepness, resting areas, and turnaround spots to allow for greater access for people with disabilities.



The park features a mix of playground elements.



There is no accessible pathway through the park.

Town-owned Properties and Facilities

Location	Barrier	Suggested Action	Priority*	Responsibility	Timeframe
Access	No Accessible Paths.	Explore Potential For Accessible Path	Low	Town of Lee	5+ Years
Benches	No Benches for Resting	Add Accessible Benches	Medium	Town of Lee	3-5 Years

Gazebo

The gazebo is located next to a large parking lot with adequate spaces but there are no spaces designated for accessible parking. The 2010 ADA Standards require at least one accessible space in every lot. The municipal lot does have accessible parking, but it is not near the gazebo.

The town should designate a space close to the gazebo for accessible parking and appropriately line and sign it.

Access to the gazebo is smooth and with an appropriate slope. The benches outside of the gazebo are accessible and located on concrete pads. The tables inside the gazebo are not accessible. The town should install at least one accessible bench inside the gazebo. There is no accessible path to the grill, benches, and trash cans. The town should consider extending the pathway to the gazebo to other elements or place one of each on the existing access path.



The downtown gazebo provides picnic space.



The garbage can is not close enough to the accessible path.



There is an accessible pathway.

Location	Barrier	Suggested Action	Priority*	Responsibility	Timeframe
Access	Grills, Trash Cans, and Benches are Not on the Path.	Move the Grills, Trash Cans, and Benches	High	Town of Lee	In Tandem With New Public Safety Building
Parking	No Accessible Parking	Dedicate Accessible Parking Near the Gazebo	High	Town of Lee	In Tandem With New Public Safety Building

Lee Sandy Beach

Sandy Beach is privately owned property. The owners, Highlawn Farm, allow Lee residents to access the beach and the town maintains the park for public enjoyment. The beach is only open to Lee residents.

The parking lot is relatively level and on an accessible surface. Since the last evaluation, the Sandy Beach Committee installed an accessible parking space, updated the access roads to improve accessibility, and added an accessible portable restroom.

At the beach, there is no accessible path to the water and the picnic tables are not ADA accessible.



The Sandy Beach is privately owned but the public does access it.

Location	Barrier	Suggested Action	Priority*	Responsibility	Timeframe
Access	No Accessible Paths	Install Accessible Path to the Beach.	Low	DPW	5+ Years
		Install Mobi Mat Across the Reach to Reach Water			
Tables	No ADA Picnic Tables	Install ADA Picnic Table	Medium	DPW	3-5 Years

Longcope Property

Longcope Park is a 45.6-acre parcel featuring a loop trail ideal for walking, nature observing, and snowshoeing in the winter. The town received the park as a donation in 1963 and the Conservation Commission manages the property.

The parking lot is dirt and has no dedicated accessible parking which is not in compliance with 208.2.

208.2 Minimum Number. Parking spaces complying with 502 shall be provided in accordance with Table 208.2 except as required by 208.2.1, 208.2.2, and 208.2.3. Where more than one parking facility is provided on a site, the number of accessible spaces provided on the site shall be calculated according to the number of spaces required for each parking facility.



The property features a one-mile walking trail for passive recreation, which the town could consider renovating into an accessible trail.

Table 208.2 Parking Spaces

Total Number of Parking Spaces Provided in Parking Facility	Minimum Number of Required Accessible Parking Spaces
1 to 25	1
26 to 50	2
51 to 75	3
76 to 100	4
101 to 150	5
151 to 200	6
201 to 300	7
301 to 400	8
401 to 500	9
501 to 1000	2 percent of total
1001 and over	20, plus 1 for each 100, or fraction thereof, over 1000

The hiking trail is relatively flat and is a natural surface, which is not slip resistant. There are no additional amenities at the park.

The town should be thoughtful about any future development of the parcel and ensure that any additions to the park are ADA compliant and promote inclusion.



The trail network goes through wet terrain.



There is no accessible pathway through the park.

Location	Barrier	Suggested Action	Priority*	Responsibility	Timeframe
Parking	No Accessible Parking	Dedicate Accessible Parking Space	Low	Town of Lee	5+ Years
Access	No Accessible Paths	Install Accessible Path to Trailhead	Low	Town of Lee	5+ Years
Seating	No Available Seating	Add ADA Accessible Bench	Low	Town of Lee	5+ Years

Marble Street Playground



A new playground provides accessibility and safety.

Marble Street Park is on a privately-owned parcel, but the town maintains it for public access. The park features a playground section, baseball field, and a basketball court.

The town has addressed ADA barriers including installing a safe surface underneath the playground equipment, building a parking lot which includes dedicated accessible parking and adding accessible parking next to each entrance to the park. The town provides accessible benches near the play areas.

mostly grass, which is not firm and slip resistant. The basketball court is aging and could use a resurfacing to eliminate heaves. There is not easy access to the baseball field or spectator seating.

The park does not have accessible pathways connecting the different features. The park is

The town should continue with regular maintenance of the park to ensure continued accessibility and consider adding an accessible pathway to connect the park's various features.



The basketball court could use a resurfacing to eliminate heaving.



Improving access to the baseball field will require a significant amount of regrading and paving.

Location	Barrier	Suggested Action	Priority*	Responsibility	Timeframe
Access	No Accessible Paths	Install Accessible Path to Trailhead	Low	Town of Lee	5+ Years
Basketball Court	Uneven Surface	Resurface Basketball Court	Low	Town of Lee	5+ Years

South Lee Playground

The South Lee Playground is a .4-acre neighborhood park consisting of a basketball court, benches and picnic tables, and a playground.

The elements are in good condition, are designed safely, and benches provide adequate accessible resting spots. The playground elements require climbing and there are no ADA accessible swings. The town should consider adding ground-level playground components to ensure people with disabilities are included.

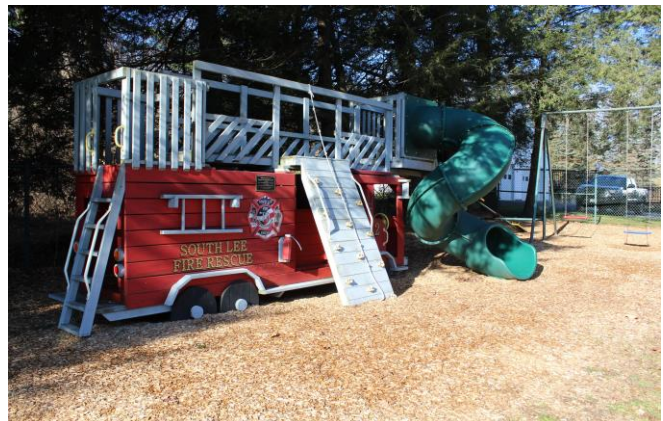
There is no dedicated accessible parking and there is no pathway throughout the park. The town should consider dedicating at least one accessible parking spot and developing an ADA pathway throughout the park.



The South Lee Playground is a small neighborhood park.



There is no accessible path through the park.



The park features swings and playground equipment.

Location	Barrier	Suggested Action	Priority*	Responsibility	Timeframe
Equipment	Lack of ADA Playground Equipment	Install ADA Equipment	Medium	Town of Lee	3-5 Years
Access	No Accessible Path	Install Accessible Path	Low	Town of Lee	5+ Years

Town Farm

The town farm is 168.5 acres of undeveloped land recently acquired by the town of Lee. The parcel does not have public access nor signage welcoming residents to the property.

The farm has potential for future recreational use but at this point it is only an open field. The property connects to Longcope Park and the town has the potential to install an ADA accessible trail on the site.

In the event the town develops the property, it should do so in a manner that promotes accessibility and meets ADA standards.



The Town Farm is currently undeveloped.

Location	Barrier	Suggested Action	Priority*	Responsibility	Timeframe
Undeveloped Land.	No ADA Accommodations	Add Accommodations During Development	Low	Town of Lee	5+ Years
Hiking Trails	No ADA trails	Explore Potential To Build ADA Hiking Trail	Low	Town of Lee	5+ Years

Town Forest/Pinnacle

The Pinnacle is a 69.5-acre property managed by the Conservation Commission and provides residents and visitors with a rustic hiking experience.

The property features a small, gravel parking lot. It does not have dedicated accessible parking. The trail system is largely inaccessible because of rough, natural surfaces and a steep grade. However, there is potential for the town to add accommodation such as accessible benches and parking to provide some additional access to the property.

The property is large enough to accommodate a future ADA accessible trail if the town opts to invest significantly into the trail system.



The Pinnacle is a popular hiking location.

Location	Barrier	Suggested Action	Priority*	Responsibility	Timeframe
Parking	No Accessible Parking	Dedicate At Least One Accessible Parking Space	Low	Conservation Commission	5+ Years
Access	No Accessible Path	Install Accessible Path	Low	Conservation Commission	5+ Years

Town Soccer Fields

The town's soccer fields are part of a shared parcel with the town's Department of Public Works. The 21.3-acre parcel features two standard high school level soccer fields near the Wastewater Department building.

Visitors have parking at the Wastewater Department, however, there is an inadequate number of spots to service both the Wastewater Treatment plant and visitors to the soccer field. Visitors typically park on the grass when attending events or using the fields.

The town should consider adding parking near the fields, separating the spaces for the two property usages, and lessening the distance between the park and the fields. The parking should include at least one accessible space.



The soccer fields are located along Route 2.

208.2 Minimum Number. Parking spaces complying with 502 shall be provided in accordance with Table 208.2 except as required by 208.2.1, 208.2.2, and 208.2.3. Where more than one parking facility is provided on a site, the number of accessible spaces provided on the site shall be calculated according to the number of spaces required for each parking facility.

Table 208.2 Parking Spaces

Total Number of Parking Spaces Provided in Parking Facility	Minimum Number of Required Accessible Parking Spaces
1 to 25	1
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76 to 100	4
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151 to 200	6
201 to 300	7
301 to 400	8
401 to 500	9
501 to 1000	2 percent of total
1001 and over	20, plus 1 for each 100, or fraction thereof, over 1000

The fields are grass, which is not firm and slip-resistant and there are no benches or other accommodations. The town could increase accessibility by adding accessible benches and spectator seating. The town could consider installing an ADA accessible path from the parking area to the fields.

Town-owned Properties and Facilities

Location	Barrier	Suggested Action	Priority*	Responsibility	Timeframe
Parking	No Accessible Parking	Install Designated Accessible Parking Space	Medium	Town of Lee	3-5 Years
Accessible Path	No Accessible Path	Install Accessible Path	Low	Town of Lee	5+ Years

Pedestrian Mobility Downtown

The Berkshire Regional Planning Commission examined the sides in the downtown area. The evaluation focused on Main Street and the immediately adjacent side streets and along Route 20 from the intersection with West Park Street and the intersection of Pleasant Street. The area represents the greatest density of both goods and services and housing, and the evaluation identifies connectivity barriers.

The evaluation looked for relatively obvious signs of barriers to accessibility including slopes, cross slopes, curb ramps, and the condition of the sidewalks. The most notable challenges BRPC identify are related to broken pavement on side streets that intersect with Main Street, worn detectible footings, a lack of audible and vibrotactile features at crosswalks, and evaluation challenges connecting side streets.



There are no curb ramps at some of the intersections with side roads in the downtown. The roads that the town has not reconstructed recently also have worn pavement, limiting accessibility.

Curb Ramps

The Americans with Disabilities Act (ADA) requires that new and altered facilities be accessible. Title II of the ADA covers sidewalk and street construction and transit accessibility, referencing the ADA Accessibility Guidelines (ADAAG) or the Uniform Federal Accessibility Standards (UFAS) for new construction and alterations undertaken by or on behalf of a state or local government. The Department of Justice (DOJ) title II regulation specifically requires that curb ramps be provided when sidewalks or streets are newly constructed or altered.

A curb ramp or other sloped area is required whenever a new or altered pedestrian walkway crosses a curb or other barrier to a street, road, or highway. Similarly, a curb ramp is required wherever a new or altered street intersects a pedestrian walkway. A curb ramp may be perpendicular to the curb it cuts or parallel with the sidewalk. Other designs may also comply, including sidewalks that ramp down to a lesser curb height, with a short perpendicular curb ramp to the street, blended or at-grade connections, or raised crossings that connect at sidewalk level.



There are some crosswalks on Main Street that do not have curb ramps.

The running slope of a new curb ramp should not exceed 1 in 12 (8.33%). Steeper ramps are not usable by many pedestrians in wheelchairs and scooters. Cross slope should be limited to 1:48 (2%).

A level landing should be provided at the top of a perpendicular curb ramp. A curb ramp must



Signals with audio capabilities increase accessibility.

connect at the top to a level landing that is at least 48 inches (1220 mm) deep with a cross slope of no more than 1:48 (2%). The side flares of a curb ramp are not intended for accessible travel (the slope of a side flare is limited so that it will not present a tripping hazard to pedestrians).

The foot of a curb ramp should be contained within the crosswalk markings. Pedestrians who use wheelchairs should not be directed outside the crosswalk or into an active travel lane in order to cross stopped traffic. If a diagonal ramp is used, a 48-inch long (1220 mm) bottom landing must be provided in the space between the curb radius and curb line extensions.

The transition from curb ramp to the gutter should be flush. Lips are not permitted. Gutter counter slope in the line of travel should not exceed 1 in 20 (5%) and should connect smoothly with other elements of the pedestrian network.

The boundary between the sidewalk and street should be detectable underfoot. A 24-inch strip of truncated dome (detectable warning) material should be provided the full width of the ramp or other uncurbed connection to the crosswalk so that pedestrians do not inadvertently travel into the street.

None of the Main Street crosswalks have detectable warning material. The detectable warning surfaces on many of the ones along Park Street are worn and need replacement.

One crosswalk on West Center Street is missing a curb ramp on one side.

There are multiple crosswalks on the North Side of Main Street that do not have any curb ramps and/or descend from a set of stairs to an uncut curb. The town could increase accessibility by installing curb ramps there to increase connectivity.

There are crosswalks on High Street that do not have any additional safety features, including those next to the senior housing at Crossway Village. The town should prioritize upgrading the pedestrian connectivity from Crossway Village to downtown.

Sidewalks

A new sidewalk should be wider than the minimum accessible travel width of 36 inches (915 mm). Additional maneuvering space is necessary for a pedestrian using a wheelchair to turn, to pass by other pedestrians, to operate and pass through an entrance door, to use a sidewalk telephone or to activate a pedestrian crossing button. A 60-inch (1525-mm) minimum width can accommodate turns and passing space and is recommended for sidewalks adjacent to



There are several locations on Housatonic Street and High Street where the cross slope exceeds the maximum 2% slope.

curbs in order to provide travel width away from the drop-off at street edge; a 48-inch width can accommodate side-by-side travel with a service animal. The cross slope of a sidewalk should not exceed 1:48 (2%).

Excessive cross slope requires additional energy to counteract and tends to direct wheelchair users into the street, particularly when it is wet, icy, or snowy underfoot. At driveways there should be a minimum 36-inch passage with a cross slope of no more than 1:48 (2%). Corners at intersections should be in both directions since the running slope of one walkway will be the cross slope of another.

Lee's sidewalks are in generally good condition. High Street is affected significantly by elevation and there are various places where the sidewalks have a cross slope that exceeds the 2% requirement. The intersection with West Center Street also poses a significant increase in elevation that is difficult to address due to the layout of the land.



Many of the detectible footings have worn, most notably along Housatonic Street.

Street Furniture

Street furniture, plantings, and other fixed items should not protrude into travel routes. Pedestrians with vision impairments can detect objects mounted on walls or posts if they are installed so that the leading edge is less than 27 inches (685 mm) above the sidewalk. Items mounted above this height should not project more than 4 inches (100 mm) into any circulation route. Care should be taken to locate temporary signage so that it does not impede pedestrian travel.

Travel routes throughout Lee's downtown are mostly clear of obstacles. The few areas where items restrict the sidewalk, such as a ramp to a building or a staircase, are of a short distance.



The sidewalks throughout Railroad Street are in need to replacement.

Travel Routes

The audible and vibrotactile information delivered at the pedestrian button of an accessible pedestrian signal (APS) can identify pedestrian signal phases and provide other nonvisual information about the nature of a crossing.

The intersections near Big Y all feature audio and vibrotactile features providing accessible access. However, none of the other crossways feature audio and/or vibrotactile features. The town should prioritize adding those features to its downtown crosswalks.

Insufficient crossing time may be a barrier for some pedestrians. Every pedestrian cohort should be expected to contain some walkers whose rate of travel is less than 3.5 feet per second. Some jurisdictions add additional time using video technology; others employ a pedbutton to call for a longer crossing cycle. Lee's signalized crosswalks provide sufficient crossing time.

Temporary work should be accessible. Where construction blocks a public sidewalk for more than a short time, an alternate accessible route should be provided that is cane detectable. Sidewalk barriers should be continuous and cane detectable as well. Temporary events and facilities should also meet accessibility criteria.

Lee has multiple construction projects ongoing which limit accessibility. The town should provide accommodation to areas under construction for pedestrian access if possible.

Pedestrian facilities on and along sidewalks must be accessible. Signal actuating buttons, drinking fountains, telephones, kiosks, and other pedestrian elements should meet accessibility criteria for approach and maneuvering space, reach range, and operation.



The typography poses significant challenges in connecting the residential area of High Street with the downtown.



Lee ADA Sidewalk Evaluation						
Street	From Street	To Street	Rating (1= bad, 4= good)	Barriers	Length (miles)	Suggested Action
Main Street	Park Street	Franklin	3	Cracks In Sidewalk Faded Crosswalks No Detectible Warning Surfaces	.14	Maintain Sidewalks Repaint Crosswalks Install Detectible Warning Surfaces
Main Street	Franklin	Academy	3	Excessive Cross Slope in Crosswalk No Audible and Vibrotactile Features at Crosswalk No Detectible Warning Surfaces	0.09	Maintain Sidewalks Install Accessibility Features Install Detectible Warning Surfaces
Main Street	Academy	Ferncliff	3	Uneven Pavement Where Main Meets Both Ferncliff and Academy Excessive Cross Slopes No Detectible Warning Surfaces	0.11	Repave Side Streets Repair Cross Slopes Install Detectible Warning Surfaces

Town-owned Properties and Facilities

Main Street	Ferncliff	West Center	3	No Curb Ramps at Crosswalk	0.1	Install Curb Ramp
West Center	Canal	High	3	No Curb Cut from Southern Crosswalk Connecting to Downtown Area Missing Detectible Surface at Intersection	0.22	Install Curb Cut Add Detectible Surfaces
Elm Street	Main	Railroad	2	Intersection With Main Under Construction Steep Slope	0.05	Provide Accessible Route During Construction Consider Designing Accessible Route to Railroad Street on the North Side of Main
Railroad Street	Elm	Consolati Way	1	Missing or Damaged Sidewalk Excessive Cross Slope at Consolati Way Intersection	0.24	Repair and Install Sidewalks on Both Sides Resident Sidewalk to Ease Slope
Housatonic Street	Main	Pleasant	3	Cracked Sidewalk West of Park Street Intersection Worn Detectible Surface at Crosswalks	1	Replace Lost Material in Sidewalk Install New Detectible Surfaces Regrade Sections of

Town-owned Properties and Facilities

				Excessive Cross Slope Near Mass Pike Steep Transition into Big Y Parking Lot		Sidewalk Work With Big Y To Design Pedestrian Access
High Street	Park	Franklin	2	Excessive Cross Slope Near Municipal Parking Entrance	.14	Re-grade Sidewalk
Franklin	High	Main	1	Cross Slope Too Steep at Intersection with Main		Re-Grade Intersection
High Street	Franklin	Academy	2	Various Areas of Excessive Cross Slopes	.11	Monitor and Regrade Areas as Needed
Academy Street	High	Main	1	Too Steep	.1	Consider Potential Options to Design an Accessible Pathway Connecting High to Main Street
High Street	Academy	Ferncliff	2	No Safety Features at Crossway Village Crosswalk	.11	Redesign Crosswalk
Ferncliff Street	High	Main	1	No Detectible Surfaces Too Steep	.11	Add Detectible Surfaces Consider Other Pedestrian Options to Connect with Main Street
High Street	Ferncliff	West Center Street	2	Too Steep Near Center Street and	.12	Redesign Grade with Future Sidewalk Improvements

Town-owned Properties and Facilities

				Dublin Hill		
School Street	High	Main	1	No Sidewalks	.11	Install Sidewalks

Town-owned Properties and Facilities

Crosswalk	Detectable Surface	Curb Ramp	Audible and Vibrotactile Signals
1 Canal Street	One Side	Yes	No
2 Canal Street	Yes	Yes	No
3 Center	Yes	Yes	No
4 Main	No	No	No
5 School	No	Yes	No
6 Elm	No	No	No
7 Ferncliff	No	Yes	No
8 Main	No	Yes	No
9 Main	No	Yes	No
10 Academy	No	Yes	No
11 Main	No	No	No
12 Main	No	Yes	No
13 Franklin	No	Yes	No
14 Main	No	Yes	Push Button Lights
15 Railroad	No	Yes	No
16 Main	No	One Side	No
17 Price Chopper	No	Yes	No
18 Main Town Hall	No	Yes	No
19 Park	One Side	Yes	No
20 Park Place	Needs Replacement	Yes	No
21 High	Needs Replacement	Yes	No
22 Park and High	Needs Replacement	Yes	No
23 Orchard	Needs Replacement	Yes	No
24 Housatonic Citgo	Needs Replacement	Yes	No
25 Housatonic	Yes	Yes	No
26 Athletic Field	Yes	Yes	No
27 Starbucks	Yes	Yes	No
28 Housatonic Fuller	Yes	Yes	No
29 Fuller	Yes	Yes	No
30 McDonalds	Yes	Yes	No
31 Off Ramp North	Yes	Yes	No
32 Housatonic	Yes	Yes	Yes
33 Off Ramp South	Yes	Yes	Yes
34 Big Y Express	Yes	Yes	Yes
35 South Side Off Ramp	Yes	Yes	No
36 102	Yes	Yes	Yes

Town-owned Properties and Facilities

37 102 South Toward Outlets	Yes	Yes	Yes
38 South Side Off Ramp	Yes	Yes	Yes
39 Big Y Entrance	Yes	Yes	No
40 High at Fuller	No	Yes	No
41 High at Fuller	No	Yes	No
42 High at Fuller	No	Yes	No
43 Crossway Village	No	No	No
44 Academy	No	Yes	No
45 Academy	No	Yes	No
46 High Center	Yes	Yes	No
47 Center	One Side	Yes	No

Summary of Major Findings

- The town meets the administrative requirements to post a grievance procedure, a written notice of the town's commitment to equitable access to services and facilities, and appointed Town Administrator Christopher Brittain as the ADA coordinator.
- The town provided training opportunities to those in charge of the physically built infrastructure in town. However, most town departments have not attended trainings that will provide them knowledge of best practices to ensuring that all aspects of services are accessible.
- The town does not have any department-specific policies in place.
- The town is currently undertaking a significant change in its built environment. The Town Hall and Library are historic buildings with little change in usage pending. The town should prioritize making accessible improvements there. The new public safety building should address accessibility challenges in multiple buildings and the town should be mindful of accessibility when seeking reuse of soon-to-be-vacant space.
- The town has buildings that do not provide direct service to the public. However, adding accessibility features will assist town employees.
- The town does not utilize text telephone or other communications equipment to accommodate people with disabilities.
- The town made significant progress in implementing previously crafted recommendations to the parks system. The town and the state are poised to make additional improvements to the Athletic Field, which could make it the town's first fully accessible park.
- The downtown is very walkable and well-designed but there are additional accessibility features it can provide.

Recommended Next Steps

- The ADA Self-Evaluation and Transition plan establishes an inventory of needs and creates a roadmap to accessibility. The upcoming demolition of multiple buildings and new construction eliminates a significant number of accessibility barriers, but some town properties will remain. ADA accessibility should be considered throughout the process of determining the future of soon-to-be-vacant spaces. Any re-use plan should recognize the accessibility needs.
- The town can implement many of the recommendations in-house with the resources it currently has access to, but other barriers require a significant capital investment. Officials should immediately implement the projects it prioritized the highest and be thoughtful about the re-use of its spaces.
- Town officials should pursue grants, many of which are available through the Massachusetts Office on Disability, to implement larger scale renovations to increase accessibility or to fast-track improvements that the town would otherwise have to implement over several years.

- The town should provide a copy of this plan for public access and solicit input and consider forming a Commission on Disabilities to help solicit feedback and craft department-specific policies. The Commission should include representation from people with lived experiences with a disability or caring for someone with a disability.
- The town should consider providing staff additional learning opportunities. The Massachusetts Office on Disabilities frequently provides training staff could attend.
- The Highway Department should continue its efforts to maintain it and add accessibility features such as detectable services when possible.
- The Athletic Field and the South Lee Playground provide the greatest variety of recreational activities and serve two different neighborhoods. Increasing accessibility at those two parks should be the town's priorities to ensure all community members have access to opportunities.
- The community provides a significant number of hiking and nature experiences but the geographic layout at many of those areas make it difficult for people with disabilities. Adding an ADA hiking trail supports the recreational economy and improves the community's health and wellness. The town should look for an opportunity to build a publicly accessible ADA hiking trail, either through partnership with outside organizations or internally, wherever most feasible.

Resources

Organizations

- Adaptive Environments, 374 Congress Street, Suite 310, Boston, MA 02210. (800) 949-4232 (v/tty); <http://www.adaptenv.org/>.
- American National Standards Institute, 1819 L Street, NW, Washington, DC 20036. (202) 293.8020; Fax: (202) 293.9287; <http://www.ansi.org/>.
- The Access Board, 1331 F Street, NW, Suite 1000, Washington, DC 20004-1111. (202) 272-5434 (v), (202) 272-5449 (tty), (202) 272-5447 (fax). Federal standards: <http://www.access-board.gov/adaag/html/adaag.htm>.
- Massachusetts Architectural Access Board, One Ashburton Place, Room 1310, Boston, MA 02108. (617) 727-0660 (v and tty), (617) 727-0665 (fax). State standards: http://www.state.ma.us/aab/aab_regs.htm.
- Massachusetts Office on Disability, One Ashburton Place, Room 1305, Boston, MA 02108. (617) 727-7440 or (800) 322-2020 (voice and TTY); <http://www.magnet.state.ma.us/mod>.
- National Center on Accessibility, Indiana University, 2805 East 10th St, Suite 190, Bloomington, IN 47408-2698. (812) 856-4422 (Voice), (812) 856-4421 (tty), (812) 856-4480 (Fax); <http://www.ncaonline.org/>.
- U.S. Architectural and Transportation Barriers Compliance Board ("The Access Board"), 1331 F Street, NW, Suite 1000, Washington, DC 20004-1111. (800) 872-2253, (800) 993-2822 (tty), (202) 272-5447 (fax). Online at <http://www.access-board.gov>.

Publications

- 2010 ADA Standards for Accessible Design; The Department of Justice
- ADA Guide for Small Towns; U.S. Department of Justice, Civil Rights Division
- 36 CFR Part 1191: Americans with Disabilities Act Accessibility Guidelines; Recreation Facilities. U.S.
- Architecture and Transportation Compliance Board. Federal Register (July 9, 1999). Washington, D.C.
- 36 CFR Part 1191: Americans with Disabilities Act Accessibility Guidelines; Play Areas. U.S. Architecture and Transportation Compliance Board. Federal Register (April 30, 1998). Washington, D.C.
- ADA Transition Plan Workbook. State House Bookstore, State House, Room 116, Boston, MA 02133.
- Americans With Disabilities Act Resource Guide for Park, Recreation, and Leisure Service Agencies, First Edition. Lynn M. Casciotti, Editor. National Recreation and Park Association, Arlington VA, 1992.
- Americans with Disabilities Act, Public Law 226, 101st Congress. U.S. Government Printing Office, July 26, 1990.
- Designing Sidewalks and Trails for Access: Review of Existing Guidelines and Practices. Barbara McMillen (editor). U.S. Department of Transportation, 1999.

- Everyone's Nature: Designing Interpretation to Include All. Carol Hunter. Falcon Press Publishing Co., Inc., Helena, Montana, 1994.
- Play for All Guidelines: Planning, Designing and Management of Outdoor Play Settings for All Children. Robin Moore et al. MIG Communications, 1992.
- Reasonable Accommodation: Profitable Compliance with the Americans with Disabilities Act. Jay W. Spechler. St. Lucie Press, Delray Beach FL, 1996.
- The Americans with Disabilities Act: A Review of Best Practices. Timothy Jones. American Management Association Membership Publications Division, New York, 1993.
- Universal Access to Outdoor Recreation: A Design Guide. PLAE, Inc., Berkeley CA, 1993.
- Universal Trail Assessment Coordinator Training Guide. P. Axelson et al. Pax Press, Santa Cruz, 1997.

Potential Funding Sources for Implementation

- Massachusetts Office on Disability: <https://www.mass.gov/orgs/massachusetts-office-on-disability>
- United States Department of Agriculture: <https://www.rd.usda.gov/programs-services/all-programs/community-facilities-programs>
- Community Development Block Grant – Architectural Barrier Removal: <https://www.mass.gov/files/documents/2017/12/04/Architectural%20Barrier%20Removal.pdf>
- Complete Streets: <https://www.mass.gov/complete-streets-funding-program>
- MassWorks: <https://www.mass.gov/orgs/massworks>