

Alford ADA Self-Evaluation and Transition Plan

June 2024



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Introduction

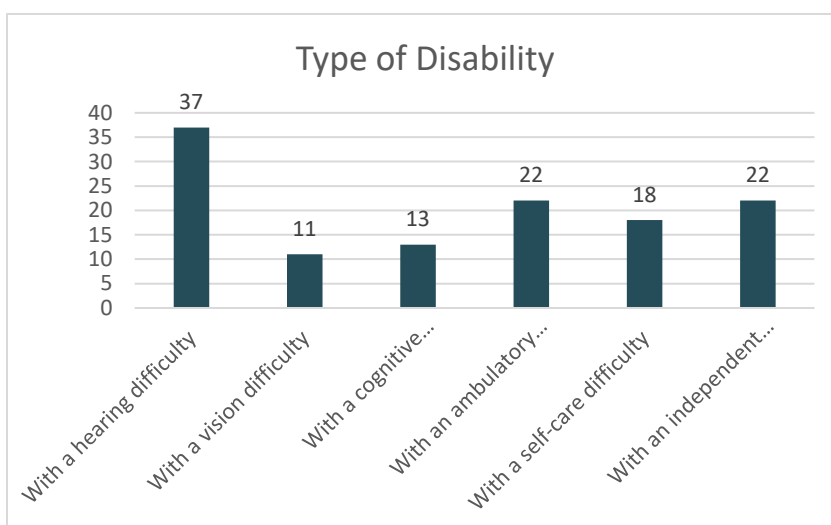
Alford is located in the westernmost region of the Commonwealth. It is a close-knit community with a population of 450 people, one of the smallest of the 351 municipalities in Massachusetts.

Like most Berkshire County towns, Alford is an aging community. The median age of residents is 61.6, according to the American Community Survey 2022 Five-year Estimates, which increased from 57.7 a decade ago.

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.

Currently, 16% of Alford's population reports having a disability, according to the American Community Survey. The Census Bureau identifies six types of disabilities - hearing, vision, cognitive, ambulatory, self-care, and independent living difficulties.

The trend demonstrates a need to be more inclusive in the way towns provide access to services while also recognizing that eliminating barriers also increases accessibility for abled-bodied people.



Alford owns few properties in town and those that it does all date back prior to the federal government adoption of the Americans with Disabilities Act. All the buildings have accessibility barriers, especially the town offices where residents access the greatest number of services.

The town already designed and is now seeking funding for a capital improvement project to address several accessibility issues at the Town Offices, which are currently inaccessible.

Alford received support from the Massachusetts Commission on Disability to conduct this Self-Evaluation and Transition Plan. The evaluation identifies accessibility barriers to all municipal services and buildings. 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.

Alford engaged with the Berkshire Regional Planning Commission to conduct the evaluation and develop the transition plan. ADA Coordinator TJ Horrigan conducted the site visits and survey alongside BRPC and provided important context, history, and future plans to guide the implementation. The Board of Selectmen reviewed the report and established priorities to address deficiencies.

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 building accessible to, functional for, and safe. 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 Requirements

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 Select Board appointed TJ Horrigan as the ADA coordinator on September 11, 2023.

Posting of an ADA Notice

The town shall publicly post notice that it abides by Title II of the ADA. The town must post the notice in perpetuity and locate it in at least one prominent public area, usually designated as a source of public information. Publishing the ADA notice is not a one-time requirement. State and local governments should provide the information on an ongoing basis, whenever necessary. 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 the ADA without being too lengthy, legalistic, or complicated. It should include the name and contact information of the ADA Coordinator and include statements about:

- Employment,
- Effective communication,
- Making reasonable modifications to policies and programs,
- Not placing surcharges on modifications or auxiliary aids and services, and
- Filing complaints.

Alford complies with its requirements to post an ADA Notice. The notice is available on the town's website.

NOTICE UNDER THE AMERICANS WITH DISABILITIES ACT

In accordance with the requirements of title II of the Americans with Disabilities Act of 1990, the Town of Alford will not discriminate against qualified individuals with disabilities on the basis of disability in the Town's services, programs, or activities.

Employment: The Town does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under title I of the Americans with Disabilities Act (ADA).

Effective Communication: The Town will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in the Town's programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

Modifications to Policies and Procedures: The Town will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all Town programs, services, and activities. For example, individuals with service animals are welcomed in Town offices, even where pets are generally prohibited.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a Town program, service, or activity, should contact Thomas J. Horrigan, ADA Coordinator, 5 Alford Center Road, Alford MA 01230, (413) 528-6327, as soon as possible but no later than 48 hours before the scheduled event.

The ADA does not require the Town to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

Complaints that a Town program, service, or activity is not accessible to persons with disabilities should be directed to Thomas J. Horrigan, ADA Coordinator, 5 Alford Center Road, Alford, MA 01230 (413) 528-6327.

The Town will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to persons who use wheelchairs.

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 a 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.

The town of Alford adopted the following grievance procedure.

Town of Alford, Massachusetts,
Grievance Procedure under
The Americans with Disabilities Act

This Grievance Procedure is established to meet the requirements of the Americans with Disabilities Act of 1990. It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the Town of Alford. The Town's Personnel Policy governs employment-related complaints of disability discrimination.

The complaint should be in writing and contain information about the alleged discrimination such as name, address, phone number of complainant and location, date, and description of the problem. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint, will be made available for persons with disabilities upon request.

The complaint should be submitted by the grievant and/or his/her designee as soon as possible but no later than 60 calendar days after the alleged violation to: Thomas J Horrigan, ADA Coordinator, 5 Alford Center Road, Alford, MA 01230.

Within 15 calendar days after receipt of the complaint, Thomas J. Horrigan or his designee will meet with the complainant to discuss the complaint and the possible resolutions. Within 15 calendar days of the meeting, Mr. Canales or his designee will respond in writing, and where appropriate, in format accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of the Town and offer options for substantive resolution of the complaint.

Three Preliminary Steps to ADA Compliance

If the response by Thomas J. Horrigan or his designee does not satisfactorily resolve the issue, the complainant and/or his/her designee may appeal the decision within 15 calendar days after receipt of the response to the Select Board or their designee.

Within 15 calendar days after receipt of the appeal, the Select Board or their designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the Select Board or their designee will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

All written complaints received by Thomas J. Horrigan or his designee, appeals to the Select Board or their designee, and responses from these two offices will be retained by the Town for at least three years.

Evaluation of Town Policies and Procedures

The town evaluated its policies and procedures addressed with Title II of the Americans with Disabilities Act. Inadequate or non-existent policies and procedures can be a large non-structural barrier to equitable access.

Alford is like other small communities with limited personnel on staff, Alford has not yet developed departmental specific policies and procedures and only a few of the staff have attended ADA training. The town does have a grievance procedure, notice of non-discrimination, and an ADA coordinator, as noted previously in this report.

The town has a procedure in place to support voting on election days. The community votes at Town Hall. The Town Hall does not have accessible parking, but the town temporarily delineates a space next to an accessible ramp. The town has an ADA compliant voting booth and the voting occurs in an accessible location.

Evaluation of Town Departments

Alford divides its town employees into 13 separate departments. Each department has unique responsibilities and employment qualifications.

Depts.	Services	ADA Training	ADA Policy	Accommodations
Assessors	Assessors provide vital financial services to towns that enable municipal officials to prepare accurate, reliable spending and revenue plans. The Assessor values personal and real property each year for the purpose of taxation	No	No	No
Cemetery Department	Individuals caring for deceased relatives and friends are encouraged to plan carefully and communicate in advance with any facilities and agencies that may be involved, such as a hospital, hospice, nursing home, board of health, funeral home, crematory or cemetery, to avoid confusion about the law or other requirements.	No	No	No
Children's Library	Provides educational material to children, free public Wi-Fi, and	No	No	No

	operates an adult library through a partnership with Great Barrington.			
Fire Department	All volunteer Fire Department responding to emergency calls and assisting public safety agencies in neighboring towns.	No	No	No
Highway Department	The highway department works on maintaining roadways, paving and patching troubled spots, as well as cutting back trees, brush and weeds along the roadsides. They also mow the roadsides, the town center, the main intersections, and the cemeteries. They are also on-call for windstorms and fallen trees. In the winter months, the highway department is on-call all hours of the day and night for all of the snow and ice storms, keeping the roads plowed, sanded and salted.	Yes	No	No
Inspectors	Ensure private and public buildings comply with building, wire, gas, plumbing, oil, fire, and septic safety regulations.	No	No	No
Municipal Power Aggregation	Oversees the purchase of electric power.	No	No	No
Police Department	The Police Department's duties include administrative police work, firearm permits, license renewals, fingerprints, registered sex offender meetings and postings.	No	No	No
Tax Collector	The Tax Collector is responsible for the printing, mailing and collection of all tax bills issued by the Town of Alford. These include Motor Vehicle Excise Tax, Real Estate Tax and Personal Property Tax.	No	No	No
Town Clerk	Custodian of records for births, deaths, burials, marriages,	Yes	No	No

	business certificates, census records, voting records and town records. Serves as Election and Records Access Officer.			
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
Veterans Services	Veteran's counselors can answer questions about benefits, eligibility and application procedures. They can also make referrals to VA facilities, such as medical centers and national cemeteries.	No	No	No

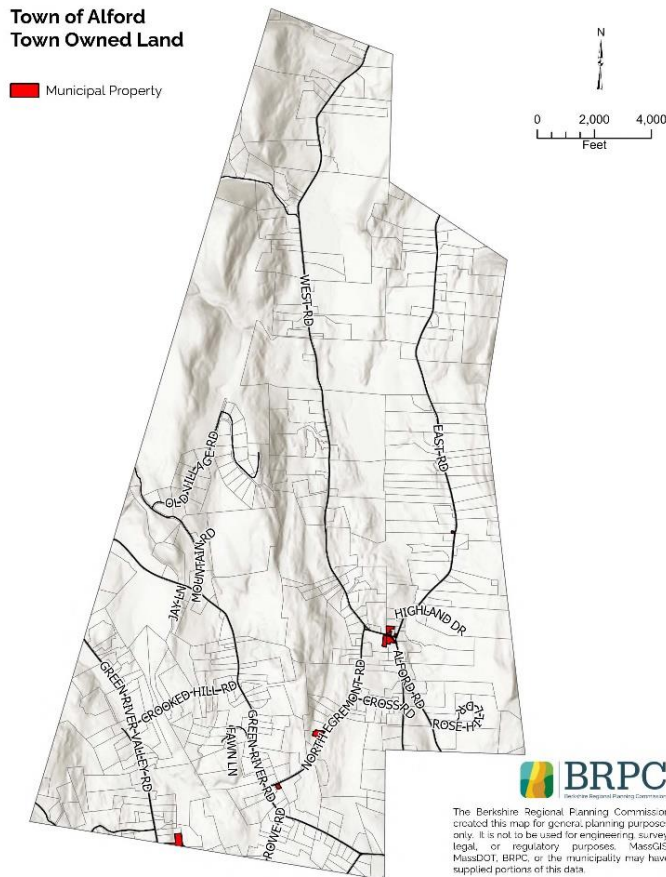
The town relies on 13 different boards or commissions to set policy. The boards and commissions are a mix between appointed and elected officials.

Depts.	Services	ADA Training	ADA Policy	Accommodations
AlfordLink Commission	Oversees the town's municipal internet service.	No	No	No
Board of Health	The Board of Health Members and Sanitary Inspectors are required by state statutes and regulations to perform many important and crucial duties relative to the protection of public health, the control of disease, the promotion of sanitary living conditions and the protection of the environment from damage and pollution.	No	No	No
Conservation Commission	The Conservation Commission is the official agency specifically charged with the protection of a community's natural resources	No	No	No
Council on Aging	The Council On Aging provides support services to elders, families and caregivers in the community, serving as an	No	No	No

	advocate for services and activities for elders.			
Cultural Council	Receives funds yearly from the state which it uses to assist local lectures, school trips, art workshops, children’s science and music groups, theater groups, concerts and many more activities and events.	No	No	No
Finance Committee	The Finance Committee is the official fiscal watchdog for the Town. Because it is difficult for all taxpayers to be completely informed about every aspect of a town’s finances, finance committees were established so a representative group of taxpayers could conduct a thorough review of municipal finance questions on behalf of all citizens.	No	No	No
Garden Club	The Club’s objective is to promote interest in gardening, to aid in conservation and to further village beautification.	No	No	No
Historic District Commission	The purpose of the Alford Historic District Commission is to promote the educational, cultural, economic and general welfare of the public through the preservation and protection of the distinctive outward appearance and characteristics of buildings and places significant in the history of the Town of Alford or its architecture, through the maintenance and improvement of settings for such buildings and places and the encouragement of design compatible with them.	No	No	No
Land Trust	The Alford Land Trust is a nonprofit member organization founded in 2003 by community residents to protect significant	No	No	No

	natural, agricultural and scenic resources; and to promote and encourage land stewardship for the benefit of the environment, the economy, and future generations.			
Planning Board	The Planning Board maintains a comprehensive plan for the town that administers subdivision regulations in accordance with the state subdivision control law, to review residential special permit applications, and to make decisions and recommendations required by the town's zoning bylaws and the state zoning act in regard to zoning amendments and rezoning petitions.	No	No	No
School Committee	The School Committee's responsibilities are to write and maintain policies that guide the district, to approve and monitor the budget for the school system, and to hire and evaluate the Superintendent of the district.	No	No	No
Select Board	Oversee all aspects of town government.	No	No	No
Zoning Board of Appeals	The Zoning Board of Appeals holds public hearings concerning applications for special permits evaluating criteria established in the Zoning Bylaws and may impose conditions on an approval that they deem as necessary to protect the health, safety or general welfare of the public.	No	No	No

Evaluation of Town-owned Facilities



- Town Hall – 5 Alford Center Road
- Town Offices – 6 Alford Center Road

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.

Based on town properties list provided by DPW Director TJ Horrigan the following town facilities were evaluated for this report:

- DPW Garage – 7 Alford Center Road
- Fire Department – 86 North Egremont Road
- Parsonage House – 7 Alford Center Road

Unless otherwise noted, *all properties were assessed on the 2010 ADA Standards* and with a focus on the Department of Justice’s 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

Town Hall

The historic Town Hall is located across from the Town Offices and on the same parcel as the Department of Public Works garage.

The building houses the library, meeting space, and storage space.

Town boards and commissions regularly hold public meetings at the Town Hall. The town previously held the Annual Town Meeting at the location but recently moved it to the Fire Department for increased accessibility.



The Town Hall is where government boards and committees hold public meetings.

Priority 1 – Accessible Approach and Entrance

The approach to the Town Hall is not accessible. There is accessible parking on Alford Center Road, but it requires someone to cross the street and traverse a driveway with an approximate slope of 9%. The driveway is too steep, which is out of compliance 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.

The accessible entrance features an appropriately sloped ramp with handrails. The accessible entrance is on the side of the building but there is no signage at other entrances indicating where that is located, which is not in compliance with 216.6.



The dedicated handicapped parking space is across the street and requires someone to maneuver uphill to access 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.

The 2010 ADA standards do not require building owners to install automatic, push-button door openers. However, the town could increase accessibility by adding one to the entrance.

Priority 2 – Access to Goods and Services

The town currently utilizes the space for public meetings. After entering through the accessible entrance, patrons have no barriers in the meeting space area. The meeting room is a large open space.

However, there is no signage to assist with wayfinding as required by 216.1 and 216.2.

216.1 General. Signs shall be provided in accordance with 216 and shall comply with 703.

216.2 Designations. Interior and exterior signs identifying permanent rooms and spaces shall comply with 703.1, 703.2, and 703.5. Where pictograms are provided as designations of permanent interior rooms and spaces, the pictograms shall comply with 703.6 and shall have text descriptors complying with 703.2 and 703.5.

The library is accessible. The library is located on the first floor and provides sufficient space to maneuver.

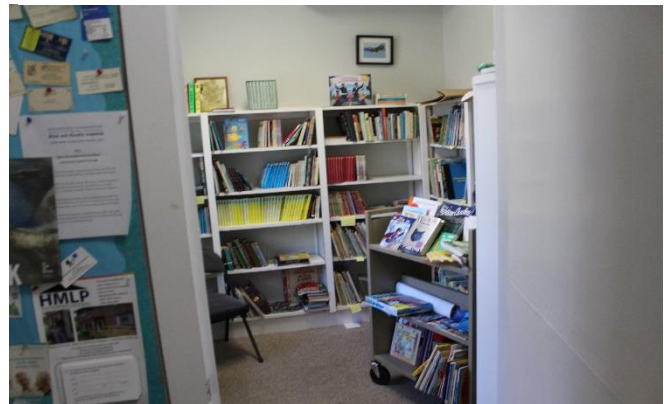
The upstairs space, which is not utilized by the public, is not accessible. The only access to the upper floor is by a set of stairs. There are doorknobs throughout the upstairs which are out of compliance with 404.2.7 and 309.4, and due to storage of items and furniture, there is little room to maneuver in multiple places.

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.

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.



The first-floor interior space is accessible.



There are no signs indicating to assist with wayfinding to rooms.



All the upstairs doors have doorknobs, which are not compliant.

Priority 3 – Access to Public Toilet Rooms

The Town Hall has two bathrooms adjacent to a kitchen area. The bathrooms are not ADA compliant.

There are signs indicating “mens” and “womens” restrooms, but the signs are not tactile and do not contain raised characters and braille. The signs are posted above the 60-inch maximum height as specified in 703.4.1.



The signs are not tactile and are placed too high above the ground.

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.

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 pipes are exposed in the men’s room. The pipes are covered in the women’s room but there is not sufficient knee clearance.

The door is opened by a doorknob that is not in compliance with 404.2.7 and 309.4, which requires handles to be operable with one hand and does not require tight grasping, punching, or twisting of the wrist.

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.

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.

The drainage and water pipes under the sink in the men's room are exposed, 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.

The drainage and water pipes in the women's room are covered with cabinetry. The cabinetry does not provide the necessary knee and toe clearances as defined in 306.

In both bathrooms, the paper towel dispensers are 58 inches off the ground, which are outside of ADA accessible reach ranges 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.

Priority 4 – Access to Other Items Such as Water Fountains

The building does not have any features the Department of Justice considers under Priority.

Location	Barrier	Suggested Action	Priority*	Timeframe
Approach & Entrance	Non-compliant Parking	Add Accessible Parking Space Closer to Building	Medium	6 Months – 1 Year
	Missing or Non-compliant Signage at Non-Accessible Entrance	Provide Compliant Signage	Medium	6 Months – 1 Year
	No Push-Button Door Openers	Install Push-Button Door Openers	Medium	6 Months – 1 Year
Access to Goods and Services	No Wayfinding Signs	Provide Compliant Signage at Each Office	Medium	2-3 Years
Toilet Rooms	No Tactile Signage	Provide Compliant Signage	Medium	2-3 Years
	Exposed Drain and Water Pipes	Cover Exposed Pipes	Medium	2-3 Years
	Lack of Knee Clearance	Re-Configure Sink	Medium	2-3 Years
	Paper Towel Dispenser Is Too High	Lower Paper Towel Dispenser	Medium	2-3 Years

Town Offices



Access to the town offices is either by a set of stairs or through the pathway pictured above, neither one of which are accessible.

The Town Offices are the primary access point for residents seeking government assistance. The small building at 6 Alford Center Road features the Town Manager’s office, Town Clerk’s office, desk space for other department leaders, a restroom, and a storage closet.

The town engaged with an architect to re-design the building’s entrances to comply with ADA standards. The large-scale project will address all accessible challenges at the Town Offices.

Priority 1 – Accessible Approach and Entrance

The Town Offices are not accessible.

There is a designated accessible parking space but neither of the two entrances to the building are accessible. One pathway requires the use of stone stairs, which leads to an entry platform that requires a significant step up. The other pathway features a ramp but getting to the ramp is through a grass and stone walkway, which is not “stable, firm, and slip resistant” as required by 302.1.

302.1 General. Floor and ground surfaces shall be stable, firm, and slip resistant and shall comply with 302.

The ramp is showing signs of age and there is a two-inch change in level which is a tripping hazard, limits accessibility, and is not compliant with 303.2.

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

There is only one handrail, which is out of compliance with 505.2 and the gripping surface exceeds the 4-inch maximum as specified in 505.7.2.

505.2 Where Required. Handrails shall be provided on both sides of stairs and ramps.

505.7.2 Non-Circular Cross Sections. Handrail gripping surfaces with a non-circular cross section shall have a perimeter dimension of 4 inches (100 mm) minimum and 6 1/4 inches (160 mm)



The wooden ramp for handicapped access is out of compliance with the 2010 ADA Standards.

maximum, and a cross-section dimension of 2 1/4 inches (57 mm) maximum.

While not required, the town could provide additional accessibility by installing a push-button door opener. Additionally, there is no sign directing people to the accessible entrance. Once the town re-establishes an accessible entrance, it should add signage to indicate where the new entrance is located.

Priority 2 – Access to Goods and Services

During the COVID-19 pandemic, the town transformed an entry doorway into a service counter in the Town Office. The entry door is a half door, which measures approximately 40 inches from the floor. As a service counter, it is not in compliance with 904.3.2.



The transition into the Town Clerk’s Office is out of compliance.

904.3.2 Counter. The counter surface height shall be 38 inches (965 mm) maximum above the finish floor or ground. The top of the counter edge protection shall be 2 inches (51 mm) maximum above the top of the counter surface on the aisle side of the check-out counter.

The general shared office space is ADA compliant, with sufficient maneuverability and appropriately sized furniture. The Town Clerk’s office is not accessible because it has a change in level of 2 inches, which does not comport with 303.2. The storage closet also features a change in level that 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.

None of the offices are identified by signage as required by 216.2.

216.2 Designations. Interior and exterior signs identifying permanent rooms and spaces shall comply with 703.1, 703.2, and 703.5. Where pictograms are provided as designations of permanent interior rooms and spaces, the pictograms shall comply with 703.6 and shall have text descriptors complying with 703.2 and 703.5.



The bathroom is compliant.

Priority 3 – Access to Public Toilet Rooms

The one rest room in the building is mostly accessible. The only missing element is a tactile or braille sign as required in Section 216 and described in Section 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.

Priority 4 – Access to Other Items Such as Water Fountains

The Town Offices do not have any features the Department of Justice considers under Priority 4.

Location	Barrier	Suggested Action	Priority*	Timeframe
Approach & Entrance	No Accessible Path to Ramp	Create Path from Parking to Ramp	High	6 Months – 1 Year
	Ramp non-compliant	Renovate or rebuild ramp.	High	6 Months – 1 Year
	Missing Signage to Accessible Entrance	Add Signage	High	6 Months – 1 Year
	No Push-Button Door Opener	Install Push-Button Door Opener	High	6 Months – 1 Year
Access to Goods and Services	Service Counter Too High	Modified Service Counter	Medium	2-3 Years
	No Wayfinding Signage	Provide Compliant Signage at Each Office	Medium	2-3 Years
	Multiple Changes in Floor Level Between Spaces	Install Transition Strips in Non-Compliant Doorways	Medium	2-3 Years

Parsonage Building

The parsonage building is currently an unused former single-family home located next to the Town Hall. The building presents the town with an opportunity to increase access to government services in the future.

The town is planning a full reconstruction of the building, which includes some partial demolition and full interior renovation. The town intends to house multiple government offices in the location. The redevelopment of the building must comply with Title II of the ADA regulations.

The property already features an ADA hiking trail.



The town acquired the parsonage building and is planning to develop it into town offices in the future.

Priority 1 – Accessible Approach and Entrance

The building is not accessible. There is no dedicated accessible parking near the building. There are no accessible routes to the entrances and neither entrance is accessible because each requires an individual to take a step up into the structure.

Priority 2 – Access to Goods and Services

There are no current goods or services provided in the facility. There are numerous difficult transitions from room to room and both the upstairs and the basement are only accessible by an interior set of stairs.

Priority 3 – Access to Public Toilet Rooms

The former bathroom has enough space to construct an ADA accessible facility.

Priority 4 – Access to Other Items Such as Water Fountains

The building does not have any features the Department of Justice considers under Priority 4.

Location	Barrier	Suggested Action	Priority*	Timeframe
All Accessibility Priorities	Building is Inaccessible	Renovate the Facility in an ADA Compliant Manner	Low	5+ Years

Fire Department



Among the town-owned buildings, the Fire Department is the most accessible.

The Fire Department is located at 86 North Egremont Road and is home to the town’s volunteer team of firefighters. The town recently began holding Annual Town Meeting at the location because it has greater accessibility than other town-owned buildings.

Priority 1 – Accessible Approach and Entrance

The Fire Department is generally accessible. There is no dedicated accessible parking 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.

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

From the parking lot, there is an accessible path to the building. The exterior door is accessible. Additionally, the garage doors can be opened to provide additional accommodation, but the town would benefit from installing an automatic door opener.

Priority 2 – Access to Goods and Services

The largest area of building is accessible when the vehicles are not located inside the main bays. At town meetings, the trucks are removed from the bay and provide people with easier access.

The chief's office is too small for someone with disabilities to be employed and working within it. The town would have to provide reasonable accommodation for a qualified chief with a disability to work.

Priority 3 – Access to Public Toilet Rooms

The bathrooms are not accessible.

The signs for the bathrooms are not tactile, are too high, and are not placed on the hinge side of the door as guided by sections 216.2, 703.4.1, and 703.4.2.

216.2 Designations. Interior and exterior signs identifying permanent rooms and spaces shall comply with 703.1, 703.2, and 703.5. Where pictograms are provided as designations of permanent interior rooms and spaces, the pictograms shall comply with 703.6 and shall have text descriptors complying with 703.2 and 703.5.

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 leafs, the sign shall be located to the right of the right hand door. Where there is no wall space at the latch side of a single door or at the right side of double doors, signs shall be located on the nearest adjacent wall. Signs containing tactile characters shall be located so 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 bathrooms do not have proper signage.



The garage area has limited room for maneuverability when the trucks are parked.



The bathrooms have exposed pipes, which is out of compliance.

The sinks have exposed pipes and drainage which is out of 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.

The light switch is located 52 inches high, which is above the 48-inch maximum height as described 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 paper towel dispensers are also too high, measuring at 58 inches. The ADA standards establishes measurements for all reach ranges in section 308.

Priority 4 – Access to Other Items Such as Water Fountains

The Department also has a kitchen area that is mostly complaint. The light switches and hooks are outside of the reach ranges as specified 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 lounge is not accessible. Someone can enter the lounge from two exterior, or one interior doorway all require one to traverse a vertical step which is not in 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.



The doorway from the main area to the lounge area requires a significant step up.

Location	Barrier	Suggested Action	Priority*	Timeframe
Approach & Entrance	No Dedicated Accessible Parking	Establish One Accessible Parking Spot	High	6 Months - 1 Year
Access To Goods And Services	Kitchen Features Out of Reach	Lower Objects To Fit Within Reach Ranges	Medium	2-3 Years
	The Lounge is Not Accessible.	Install a Transition From the Garage to the Lounge	Low	5+ Years
Toilet Rooms	No tactile Signage at Appropriate Heights and Locations	Install Tactile Signs	Medium	2-3 Years
	Light Switches and Paper Towel Dispensers are out of Reach	Lower Objects To Fit Within Reach Ranges	Medium	2-3 Years

Department of Public Works



The DPW garage features four distinct sections.

The Department of Public Works, located at 5 Alford Center Road, features four garages and an office. There is also outdoor storage of material and is the town’s transfer station.

The building is located on the same parcel as the Town Hall and adjacent to the parsonage building.

Priority 1 – Accessible Approach and Entrance

The building does not have accessible parking as defined in 208.2.

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.

208.2 Minimum Number. Parking spaces complying with 502 shall be provided in accordance with Table

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

Access to the building requires one to traverse a two-lane road and climb an inclined driveway that is above the 1:20 slope defined in the ADA standards, Section 403.3. It is the same approach one needs to take to access Town Hall.

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.



There are obstructions in each passageway from garage to garage.

There are three doorways into the building, none of which are accessible because they all require at least one step, which is out of compliance with 303.2. The garage bays, however, can be opened to allow access to most of the space.

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

Most of the services provided to the public are available outside. Employees needing to access goods inside the building can be accommodated

by opening the garage doors.

Access throughout the building is limited due to doorways and obstructions separating different garage areas. Opening the garage doors allows access to each individualized space on dry days but would present barriers with snow and ice that would create a slip hazard outdoors.

Additionally, the interior doors one would need to navigate from space to space inside are too heavy. Interior doors must be able to be opened with 5 lbs. of pressure or less and each interior door requires approximately 9 lbs.

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:

- Interior hinged doors and gates: 5 pounds (22.2 N) maximum.
- Sliding or folding doors: 5 pounds (22.2 N) maximum.

Priority 3 – Access to Public Toilet Rooms

There are no restrooms on site.

Priority 4 – Access to Other Items Such as Water Fountains

The Department of Public Works does not have any additional features the Department of Justice considers in evaluating Priority 4.

Location	Barrier	Suggested Action	Priority*	Timeframe
Approach & Entrance	No Dedicated Accessible Parking	Establish at Least One Accessible Parking Spot	Low	5+ Years
Access to Goods and Services	No Pathway Throughout the Building	Add Ramps Between Different Spaces	Low	5+ Years
	The Doors are Too Heavy	Install New Doors.	Low	5+ Years

Summary of Major Findings

- The town appointed an ADA coordinator to help resolve compliance challenges, crafted and posted a grievance policy, and has a public notice affirming its commitment to equal access.
- The Town Offices is the town's highest priority to make accessible.
- The town does not own any recreational properties.
- The town has not used TTY or other equipment to accommodate persons with disabilities.
- All town buildings have accessibility challenges.
- Following renovations to the Town Offices, the Board of Selectmen prioritized the Town Hall followed by the Fire Department because the town utilizes those to provide service to the public at higher frequencies.

Recommended Next Steps

- Department leaders should consider developing department-specific policies to address unique needs related to each service.
- The ADA Self-Evaluation and Transition Plan establishes an inventory of needs and creates a roadmap to accessibility. The plan prioritizes the most utilized public spaces that provide the greatest opportunities. Town officials should seek grants and capital funding to implement the recommendations in a timely manner.
- The town should use the plan to guide its capital improvement plan.
- Town officials should continue to seek public input on the plan and adjust accordingly. The town should post the plan on its website.
- The community should be aware that this plan is intended to be a living document, constantly updated and reprioritized based on project completion and changes in public needs, use, and desires.
- Town officials should continue its efforts to address multiple Town Offices accessibility challenges at once.
- The town should consider forming a Council on Disabilities or similar body to oversee the implementation of accessibility features.
- Department heads should provide employees the opportunities to attend Massachusetts Office on Disability or other training.

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) 2725449 (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) 7270660 (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>