

# Adams ADA Self-Evaluation and Transition Plan

June 2025



**BRPC**  
Berkshire Regional Planning Commission

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# Introduction

**A**dams, Massachusetts is located in Berkshire County, the westernmost county in the Commonwealth. The population is 8,166, making it the fourth largest municipality in the county. The town owns and operates eight facilities, 13 parks, and two cemeteries spanning approximately 170 acres of land.

The town provides services at Town Hall, the Police Station, Registry of Deeds, Visitor's Center, Adams Station, Greylock Glen Outdoor Center and Adams Memorial Middle School.

The Americans with Disabilities Act is a landmark legislation that prohibits discrimination against people with disabilities and requires communities to proactively take steps to eliminate barriers people with disabilities face when attempting to participate in the community and government affairs. Municipalities have both a legal obligation and moral duty to ensure that all residents are welcomed and have equitable access to government services and opportunities.

The federal definition of a person with disabilities is that the person has physical or mental impairment that substantially limits one or more major life activities, a person who has a history or record of such impairment, or a person who is perceived by others as having an impairment. An "impairment" is not clearly defined in the Americans with Disabilities Act. The Census Bureau consolidates disabilities into six types – hearing, vision, cognitive, ambulatory, self-care, and independent living difficulties.

**Percent of the Population with a Disability:**

Town	Percent of Population with a Disability
Adams	17.5
North Adams	21.4
Berkshire County	15.7
Clarksburg	13
Williamstown	9.9

Source: U.S. Census Bureau, U.S. Department of Commerce. "Disability Characteristics." American Community Survey, ACS 5-Year Estimates Subject Tables, Table S1810, 2023. Accessed on February 12, 2025

A greater percentage of Adams' population self-identifies as having a disability than the county as a whole and neighboring towns. Approximately 17.5% of the population identifies as having a disability, which does not account for those who do not report a disability or experience temporary disabilities.

An ADA Self-Evaluation and Transition Plan is a document the Department of Justice require municipalities to complete. The Self-Evaluation identifies barriers people with disabilities encounter when participating in government activities and programs. The Transition Plan sets forth solutions and a timeline for the town to eliminate barriers.

In 2024, Adams obtained a grant from the Massachusetts Office on Disability to conduct a new Evaluation, documenting the progress the town made and re-examining the properties in the continual effort to make facilities and programs as assessable as possible.



The Berkshire Regional Planning Commission is one of 13 regional planning agencies in the Commonwealth. Established under M.G.L. C. 40B, the commission serves Berkshire County communities with an array of services, including the development of long-range municipal and regional plans. Adams partnered with the Berkshire Regional Planning Commission to develop the ADA Self-Evaluation and Transition Plan.

The Berkshire Regional Planning Commission conducted the Self-Evaluation and Transition Plan in collaboration with town officials and the ADA coordinator. The scope of the plan examines policy and procedures, building infrastructure, web accessibility, and sidewalks to identify and prioritize opportunities to increase accessibility.

The evaluations are based on the 2010 ADA Design Standards and the Commonwealth's accessibility building codes in 521 CMR. The intent of the plan is to be a guide for the town to bring its existing properties up to date to meet the most recent codes. This evaluation does not make any assertions regarding any safe harbors, undue burdens, or exemptions the town may be entitled to claim in a legal challenge. The report and details contained within it are for general educational purposes only and do not constitute legal or professional architectural advice.

# Americans with Disabilities Act Overview

Discrimination against individuals with disabilities occurs when a person is perceived differently, treated differently, and is excluded from opportunities available to their abled-bodied peers. 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.



President Bush signed the ADA in 1990.

Photo Credit: George H.W. Bush Presidential Library and Museum.

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 inclusiveness, public entities are required to make reasonable accommodations for people with disabilities.

## Americans with Disabilities Act

Former U.S. President George H.W. Bush signed the 1990 Americans with Disability Act, legislation built upon years of Civil Rights progress. The act prohibits discrimination based on disability in employment, state and local government, public accommodations, commercial facilities, transportation, and telecommunications.

The ADA is divided into five titles:

- Employment
- State and Local Government and Public Transportation
- Public Accommodations and Services Operated by Private Entities
- Telecommunications
- Miscellaneous Provisions

Title II applies to “public entities” and the programs, services, and activities they provide. Title II outlines the requirements for a town to complete a Self-Evaluation and Transition Plan and appoint an ADA coordinator.

## The 2010 ADA Standards for Accessible Design (ADA Standards)

The Department of Justice developed the ADA Standards for Accessible Design as a comprehensive set of design requirements needed for a public facility to be physically accessible. Cities and towns shall comply with those established standards to be in conformance with the ADA. The Department updated the standards in 2010, which remain in place today. The standards are available by clicking [this link](#).

The Department of Justice identifies and prioritizes the design standards into four categories:

- 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 and Public Telephones

## 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 developed 521 CMR, which are incorporated into the Massachusetts Building Code regarding accessibility, which provides construction standards for different facilities, both municipally and privately owned. MAAB requires that all additions, reconstruction, remodeling, and alterations or repairs to existing public buildings are required to adhere to 521 CMR and local or state building inspectors enforce the code.

521 CMR is available online by [clicking this link](#).

521 CMR and the 2010 ADA Standards are often the same, however, in some cases one is more stringent than the other. In those occasions, the more stringent law takes precedence.

Additionally, 521 CMR Chapter 3 Section 3.1 is a provision for reconstructing, remodeling, and other alterations of public buildings requiring full compliance if the amount of work exceeds one of two thresholds: greater than 30% of the full and fair cash value of the building or costs more than \$100,000.

If a community undertakes a project that is above one of those thresholds, not only is the work required to comport with 521 CMR but the entire facility must also include an accessible public entrance, and, if provided, an accessible toilet room, telephone, and drinking fountain.

521 CMR 3.3.1 does provide two exceptions:

Exception: General maintenance and on-going upkeep of existing, underground transit facilities will not trigger the requirement for an accessible entrance and toilet unless the cost of the work exceeds \$500,000 or unless work is being performed on the entrance or toilet.

Exception: Whether performed alone or in combination with each other, the following types of

alterations are not subject to 521 CMR 3.3.1, unless the cost of the work exceeds \$500,000 or unless work is being performed on the entrance or toilet. (When performing exempted work, a memo stating the exempted work and its costs must be filed with the permit application or a separate building permit must be obtained).

## 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 people with disabilities. Program access is intended to remove physical barriers to the local governmental agency services, programs, and activities, but it 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.

## Sidewalks and Curb Ramps

When a public entity constructs or alters 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.

On existing roads and sidewalks that have not been altered, local governmental agencies may choose to construct ramps at every point where a pedestrian walkway intersects a curb but are not required. 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.

The U.S. Access Board published the [Public Right-of-Way Accessibility Guidelines](#) to serve as the minimum design standards a community should follow to ensure accessibility in a public right-of-way.

## Parks and Open Spaces

The ADA and 521 CMR are applicable to all public spaces, including recreational facilities and open spaces. All spaces should, at a minimum, feature an accessible route to the play or recreational area and all amenities must conform with the regulations, including reach ranges, height, toe and knee clearance, operating force, slopes, width, and maneuverability.

The 2010 ADA Standards includes specific standards for amusement rides, recreational boating facilities, fishing piers, golf facilities, miniature golf facilities, play areas, swimming pools, and shooting facilities.

521 CMR provides additional guidance on water facilities, bowling alleys, locker rooms, campsites, picnic areas and highway rest areas, playgrounds, and marine facilities.

Passive recreation and conservation areas are only partially addressed under the regulations. If features are provided, including parking, picnic tables, grills, benches, and walkways, then those must be compliant.

There is also a difference between compliant and fully accessible. For example, a playground with approximately 25% of its play structures are ground level is compliant but to be fully accessible, 50% would need to be ground level and all aerial structures need to be accessible using ramps.

Governments should consider the ADA Standards a minimum and seek to become as accessible as possible.

## Historic Properties

The ADA provides an exemption 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 a 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.

## 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 with 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



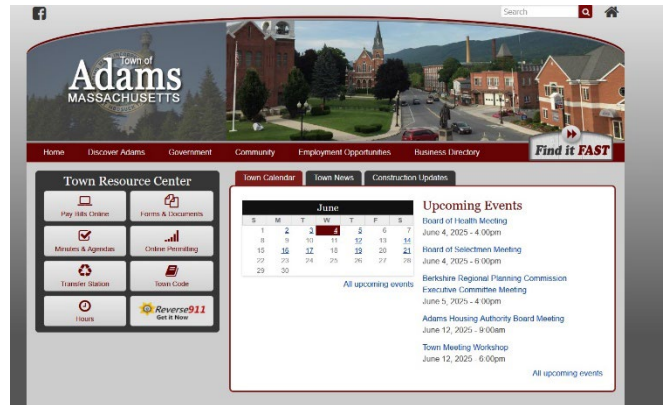
paper towel dispenser was installed prior to March 15, 2012, with its highest operating part at 54 inches, the paper towel dispenser does not need to be lowered to 48 inches because of the safe harbor provision

## Website Content and Accessibility Guidelines

In April 2024 the Department of Justice issued a new rule requiring state and local governments ensure their websites and mobile applications comply with web accessibility guidelines. Municipalities with a population of more than 50,000 people must comply by April 24, 2026, while municipalities, with a population fewer than 50,000 people, must comply by April 26, 2027.

### Applicability

Any outside vendor hired by a municipality or municipal entity to develop, create, or post web / social media content must comply with the accessibility standards. If a town hires an outside web developer to design and build the town's website or mobile applications, the town needs to make sure that the web developer's design complies with the web content and mobile app accessibility requirements. For example, if a municipality uses a mobile app for the public to pay for parking, that app must meet accessibility standards even if it is run by a private company.



The town of Adams website is managed by Civic Plus.

### WCAG 2.1

The Department of Justice adopted the Web Content Accessibility Guidelines (WCAG 2.1, Level AA) developed by the World Wide Web Consortium as the minimum requirements cities and towns must apply to their online and mobile services.

WCAG 2.1 consists of 13 guidelines, organized under four principles:

1. Perceivable
2. Operable
3. Understandable
4. Robust

Perceivable is intended to ensure web content is available to the senses; operable addresses the interface controls and navigation; understandable establishes that the information is understandable for people with disabilities; and robust focuses on the reliability of the content to be used by different users including those utilizing assistive technology.

WCAG assigns three levels of success criteria (A, AA, AAA) to each guideline. Level A is the most basic requirement to ensure people with disabilities must access web content; Level AA indicates overall web accessibility, and the community removed significant barriers to accessing the content; Level AAA

demonstrates that a community not only provides access and removes barriers to content but also took steps to enhance the online experience for people with disabilities.

For example, under the perceivable principle, one of the guidelines requires towns to provide captions on pre-recorded videos, an A standard. An AA standard is that captions are provided during live broadcasts; and an AAA standard is that the community provides sign language interpretation to pre-recorded videos. Local and state governments are required to comply with Level AA for each of the four principles.

Exemptions

### Exemptions

A local or state government can claim an undue if complying would cause an entity substantial financial or operational strain. The Department of Justice does not expect municipalities and government entities to make all web content accessible and issued a detailed list of exceptions.

#### Archived web content

- The content was created before the date the state or local government must comply with this rule, or reproduces paper documents or the contents of other physical media (audiotapes, film negatives, and CD-ROMs for example) that were created before the government must comply with this rule, AND
- The content is kept only for reference, research, or recordkeeping, AND
- The content is kept in a special area for archived content, AND
- The content has not been changed since it was archived.

#### Preexisting conventional electronic documents

- The documents are word processing, presentation, PDF, or spreadsheet files; AND
- They were available on the state or local government's website or mobile app before the date the state or local government must comply with this rule.

#### Content posted by a third party where the third party is not posting due to contractual, licensing, or other arrangements with a public entity

- The documents are word processing, presentation, PDF, or spreadsheet files, AND
- The documents are about a specific person, property, or account, AND
- The documents are password-protected or otherwise secured.

#### Preexisting social media posts

Social media posts made by a state or local government before the date the state or local government must comply with this rule do not need to meet WCAG 2.1, Level AA

# ADA Title II Self-Evaluation 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, 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 people 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 to telecommunications devices for the deaf and teletypewriter.
- 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.

# Evaluation of Administrative Requirements

Title II specifically requires towns to develop and publicize an ADA grievance procedure, post a public notice of non-discrimination, and appoint a staff member as the ADA Coordinator.

Massachusetts law provides a mechanism to create a Commission on Disabilities to research and advise government officials on matters relating to policies, procedures, services, activities, and facilities that impact people with disabilities.

Title 1 also requires towns to have an Equal Employment Opportunity policy in place.

## ADA Coordinator

The ADA requires cities and towns with 50 or more employees to appoint a person responsible for coordinating the efforts of the town government to proactively comply with Title II requirements and oversee complaints of violations.

The law does not specifically refer to position as an “ADA Coordinator,” officials in state and local governments commonly adopted the term to refer to responsible person for ADA matters.

ADA Coordinators serve as the point person for the public to pose questions and express concerns about discrimination. The ADA Coordinator can be effective in providing the public with direct contact if they wish assistive technology, sign language interpretation, or documents in other formats.

The Department of Justice advises that ADA Coordinators should be familiar with the local community and government operations, be knowledgeable about the ADA and other laws relating to people, personal experience working with people with disabilities, be knowledgeable about of alternative communication formats and technologies that enable people with disabilities to fully participate in the community, work cooperatively with government officials and people with disabilities, possess mediation skills, and have analytical skills.

The Massachusetts Office on Disability provides a training video with further details about the roles and responsibilities of ADA coordinators. [Click this link to watch the video.](#)

Adams appointed Gerald Garner to serve as the ADA coordinator.

While the town does have an ADA Coordinator, it is not well publicized. The town should provide information in multiple formats, including posting name and contact information online.

## Grievance Policy

The ADA requires local governments with 50 or more employees to adopt public procedures for resolving grievances. The procedure outlines how an aggrieved person can file a complaint, alternative means to

filing a written complaint, a description of the timeframe and processes the town will address the complaint, the appeals process, and the length of time that a complaint remain on file.

The Department of Justice advises that local governments distribute the procedure to all department heads, post copies in public spaces and on the website, and update the procedure as required. The procedure should also be available in alternative formats, such as large print, braille, audio, and more.

The town has a grievance policy, but it is not posted on its website. **The town should increase the public's awareness of how someone can file a grievance if they feel harmed.** The grievance policy reads as follows:

### EQUAL ACCESS TO FACILITIES AND ACTIVITIES

Maximum opportunity will be made available to receive citizen comments, complaints, and/or to resolve grievances or inquiries.

#### STEP 1:

The Town Administrator will be available to meet with citizens and employees during regular business hours.

When a complaint, grievance, request for program policy interpretation or clarification is received either in writing or through a meeting or telephone call, every effort will be made to create a record regarding the name, address, and telephone number of the person making the complaint, grievance, program policy interpretation or clarification. If the person desires to remain anonymous, he or she may.

A complaint, grievance, request for program policy interpretation or clarification will be responded to within ten working days (if the person making the complaint is identified) in a format that is sensitive to the needs of the recipient, (i.e. verbally, enlarged type face, etc.).

Copies of the complaint, grievance, and request for program policy interpretation or clarification and response will be forwarded to the appropriate Town agency (i.e. Park Commission, Conservation Commission). If the grievance is not resolved at this level it will be progressed to the next level.

#### STEP 2:

A written grievance will be submitted to the Town Administrator. Assistance in writing the grievance will be available to all individuals. All written grievances will be responded to within ten working days by the Town Administrator in a format that is sensitive to the needs of the recipient, (i.e. verbally, enlarged type face, etc.). If the grievance is not resolved it will be progressed to the next level.

#### STEP 3:

If the grievance is not satisfactorily resolved, citizens will be informed of the opportunity to meet and speak with the Board of Selectmen, with whom local authority for final grievance resolution lies.



## Public Notice of Non-Discrimination

The town approved a public notice of non-discrimination. The notice is not available on the town's website. The town should post the notice on its website. It reads as followed:



**Town of Adams • Massachusetts 01220**

ADAMS TOWN HALL  
8 PARK STREET  
TEL. (413) 743-8300  
FAX (413) 743-8316

### Public Notice

In accordance with the requirements of title II of the Americans with Disabilities Act of 1990 ("ADA"), the Town of Adams will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

**Employment:** The Town of Adams 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 ADA.

**Effective Communication:** The Town of Adams will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in Town 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 of Adams will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its program, services, and activities.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of the Town of Adams, should contact the office of the Town Administrator as soon as possible but no later than 48 hours before the scheduled event.

The ADA does not require the Town of Adams 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 program, service or activity of The Town of Adams is not accessible to persons with disabilities should be directed to the Town Administrator.

RECEIVED-POSTED  
24 MAY 22 PM 12:58  
TOWN CLERK  
ADAMS MASS.  
CLERK

*"Home of Mt. Greylock"*



## Equal Opportunity Employer

The town has an equal opportunity employer policy in place, as required by Title I of the ADA. The policy reads:

### A. Reasonable Accommodation Policy

It is the policy of the Town of Adams that no otherwise qualified individual with a disability shall, solely by reason of his/her disability, be excluded from employment or employment related benefits. Employment, hiring, and advancement will be based solely on the employee's or applicant's ability to perform what the Town of Adams determines to be the essential functions of a position.

Further, it is the policy of the Town of Adams that reasonable accommodation will be made for an otherwise qualified applicant or employee with a disability, unless the Town of Adams can demonstrate that the accommodation imposes an undue financial or administrative hardship on the operation of its programs.

Notice of the availability of reasonable accommodations for job applicants will be included in postings and advertisements and will be made available upon request to applicants with disabilities during the pre-employment process as necessary to ensure equal opportunity for the applicant to secure employment with the Town of Adams.

All applicants will be informed at the initial interview that the Town of Adams does not discriminate on the basis of disability and that requests for reasonable accommodations needed for the performance of essential job functions or for the enjoyment of other benefits of employment should be made following receipt of a conditional offer of employment, preferable at the post employment offer meeting.

Persons with disabilities employed by the Town of Adams are encouraged to request reasonable accommodation at any time when such accommodation becomes necessary to the employee's performance of essential functions of their position or to the enjoyment of any other benefits of employment.

### B. Employment Training Assurance

It is the policy of the Town of Adams that staff training and development activities provided for Town personnel include information about ADA employment requirements. Yearly staff training and the Town's Personnel Rules and Regulations include a full explanation of ADA policies, procedures, and practices regarding employment. Yearly in-service trainings and the manual include general information on reasonable accommodation, grievance procedures, essential vs. non-essential job functions, permissible vs. impermissible inquiries and confidentiality standards. All new employees receive training in ADA policies and procedures by the end of their orientation period. Supervisors and personnel with human resources related responsibilities receive additional training appropriate to their respective positions and responsibilities.

# Evaluation of Policies and Procedures

## Commission on Disabilities

In accordance with M.G.L Ch. 40 § 8J, the Commission is responsible for coordinating and implementing programs of the Massachusetts Office on Disability in order to bring about full and equal participation in all aspects of life in the

M.G.L Ch. 40 § 8J empowers Commissions on Disabilities to:

1. research local problems of people with disabilities;
2. advise and assist municipal officials and employees in ensuring compliance with state and federal laws and regulations that affect people with disabilities;
3. coordinate or carry out programs designed to meet the problems of people with disabilities in coordination with programs of the Massachusetts office on disability;
4. review and make recommendations about policies, procedures, services, activities and facilities of departments, boards and agencies of said city or town as they affect people with disabilities;
5. provide information, referrals, guidance and technical assistance to individuals, public agencies, businesses and organizations in all matters pertaining to disability;
6. coordinate activities of other local groups organized for similar purposes.

The town does not have a Commission on Disabilities. **The town should activate a Commission on Disabilities.**

## Department Services and Accommodations

The ADA Standards addresses physical accessibility. However, the ADA is not a building code. It is a Civil Rights Law. A municipality's responsibility extends beyond simply removing physical barriers but adopting procedures to assist in the full integration for people with disabilities into civic life.

All departments should be aware of their responsibilities under the ADA to provide reasonable accommodation. The town has an ADA policy addressing employment, accommodation procedures, transportation, communication, program and facility accessibility, and the process for filing a grievance.

The town's written policy affirms that all programs and services the town provides are in accessible locations, establishes a process for someone to request accommodation, assures that people will not be charged for a reasonable accommodation, ensures that written materials will be available in different formats upon request, and requires that staff are trained to handle accommodation requests.

Additionally, the Council on Aging has a partnership with local community-based organizations to assist residents in acquiring assistive technology.

## Non-Discriminatory Operations

### A. Equal Opportunity Policy

No qualified person with a disability shall be denied the benefits of, be excluded from participation in, or otherwise be subjected to discrimination under any of the Town of Adams programs or activities. In providing its services, programs, and activities, the Town of Adams will not:

1. Deny a qualified individual with a disability the opportunity to participate in or benefit from, benefit, service or activity.
2. Deny a qualified individual with a disability the opportunity to participate in, or benefit from, any aid, benefit, or service that is not equal to that afforded to others.
3. Otherwise limit a qualified individual with a disability the enjoyment of any right, privilege, advantage, or opportunity enjoyed by other qualified individuals receiving the aid, benefit, or service.

### B. Reasonable Modification Policy

The Town of Adams will make reasonable modifications to policies and procedures necessary to accommodate the needs of a person with a disability whenever an otherwise qualified person with a disability requests such modification, unless it can be demonstrated that the requested modification would impose an undue burden or fundamental alteration to the program. Requests for reasonable modifications can be made to program staff or the ADA Coordinator and can be presented verbally or in writing. It is the responsibility of the ADA Coordinator to ensure that requests are responded to appropriately in a timely fashion, generally, not more than two working days.

Final decisions regarding requests for reasonable modifications that may in the opinion of the ADA Coordinator represent an undue burden or fundamental alteration will be made by the Town Administrator in a timely fashion and no longer than 10 working days. Individuals seeking to contest a denial of a request for reasonable modification will be given the grievance procedure in the format appropriate to their needs.

### C. Eligibility and Safety Requirements Assurance

It is the policy of the Town of Adams that prohibitions or limitations to the eligibility of qualified individuals with disabilities to receive services or participate in programs are not allowed. Eligibility requirements have been reviewed by the ADA Coordinator and updated to comply with the requirements of the Americans with Disabilities Act. Whenever programs formulate new eligibility policies or new programs are developed, policies will be reviewed by the ADA Coordinator to ensure compliance.

Safety requirements have also been reviewed to ensure that they are necessary to the safe operation of programs, and that any decision to limit the participation a person with a disability related to safety concerns will be reviewed on a case by case basis to ensure that the decision is based on facts, not myths or stereotype, and that all appropriate mitigating measures are taken to provide for maximum

participation. Staff will be informed of, and trained in any changes in eligibility and/or safety requirements that may arise.

### D. Assurance Regarding Surcharges

It is the policy of the Town of Adams that surcharges will not be charged to persons with disabilities, their family members or organizations representing them for the provision of reasonable accommodations, reasonable modifications to policies and procedures, auxiliary aids and services, or any other costs related to the participation of persons with disabilities.

### E. Integrated Services Assurance

It is the policy of the Town of Adams that all of our services, programs, and activities are provided in the most integrated setting possible. People with disabilities are not required to participate in separate programs even if separate programs specifically designed to meet the needs of persons with disabilities are offered.

### F. Significant Assistance Assurance

It is the policy of the Town of Adams that programs that receive significant assistance, either financial or in-kind, from the Town of Adams may not discriminate against persons with disabilities. It is the responsibility of the ADA Coordinator to inform organizations receiving assistance of this policy and to respond to any questions regarding its meaning and application. It is also the Coordinator's responsibility to investigate any situation in which discrimination towards persons with disabilities may have occurred, and to take appropriate action either to correct the discriminatory situation or to recommend to the Town Administrator termination of assistance.

### G. Accessible Transportation Policy

It is the policy of the Town of Adams that transportation services are accessible to and usable by participants in our programs regardless of disability. Individuals requiring accessible transportation should make their requests in writing or verbally to the ADA Coordinator. Requests should be made at least three (3) days in advance. Effort will be made to respond to requests made on shorter notice.

When a request cannot be met, notice will be given as soon as possible and at least one day before the date of the requested trip. The following local transportation providers equipped with accessible vehicles will be contacted when needed:

- Berkshire Regional Transit Authority (413) 499-2782
- Adams Council on Aging (413) 743-8333

### H. Community Referral Assurance

When providing referral to other programs or services, it is the Town of Adams policy to determine whether primary referral agencies -those commonly used- are accessible to person with disabilities and aware of the obligations of the ADA. When making referrals, the Town of Adams provides clients with disabilities information regarding community programs - that to the best of our knowledge- are accessible to persons with disabilities and comply with ADA. In each program area operated by the Town of Adams at least one accessible provider has been identified in each of the categories of services in which we



commonly make referrals. A list of accessible, ADA responsive referral agencies is available through the ADA Coordinator on request.

#### I. Training Assurance Regarding Non-Discriminatory Program Operation

The Town of Adams provides training on the ADA to new employees during orientation and to all employees through in-service at least yearly. Training covers the general information about the ADA and the principles of non-discriminatory operation including but not limited to, how to respond to requests for reasonable modifications to policies and procedures, and how to identify and respond to safety issues.

## Effective Communication

#### A. Effective Communication Policy

It is the policy of the Town of Adams that auxiliary aids and services will be provided when necessary to ensure effective communication with persons whose disabilities effect communication. Persons with communication disabilities will be given the opportunity to request the aid or service that they prefer and the requested aid or service will be given primary consideration. The preferred means of communication will be provided unless doing so would impose undue burden or an effective alternative means of communication is available.

Requests for auxiliary aids or services should be made verbally or in writing to program directors or to the ADA Coordinator. Unless otherwise specified, the Town urges requests to be made at least ten (10) days in advance of the occasion on which the communications support will be needed. Reasonable effort will be made to respond on shorter notice. The person requesting the service will be notified as soon as possible if the Town is unable to meet their request and an effective alternative will be offered. It will be the responsibility of the ADA Coordinator to train staff and oversee the implementation of effective communication procedures. The Town Administrator will be responsible for making any decision related to undue burden or fundamental alteration.

#### B. Alternative Format Policy and Procedures

It is the policy of the Town of Adams that all documents, publications and materials used in Town programs be made available to persons with disabilities who need them in alternate formats. Procedures have been established to respond to requests for alternative formats including large print, audiotape, Braille, and computer discs in a timely fashion. Three weeks' notice is generally required for the preparation of Braille materials, which are purchased through the Town of Adams, telephone (413) 743-8500. Reasonable efforts will be made to respond on shorter notice. For Braille: 1) Ferguson Industries, 173 Second Street, Cambridge, MA 02142, (617) 722-9840. V/TDD (800) 392-6450; 2) Massachusetts Association for the Blind, 200 Ivy Street, Brookline, MA 02146, (617) 738-5110, TDD (617) 731-6444; for tapes: 1) Massachusetts Association for the Blind, 200 Ivy Street, Brookline, MA 02146, (617) 738-5110, TDD (617) 731-644; 2) Recording for the Blind, 43 Thorndike Street, Cambridge, MA 02141, (617) 577-1111; and for assistive device loan 1) United Cerebral Palsy of Berkshire County, 208 West Street, Pittsfield, MA 01220, (413) 442-1562.

Large print, short audio tapes and computer discs will be prepared for staff persons who have been identified by the ADA Coordinator and trained in the necessary skills and procedures. Preparation of long audiotapes will be purchased through the Town of Adams, (413) 743-8320.

The procedure for requesting alternative formats is:

1. The person making the request should identify the materials desired and specify his/her Preferred alternate format to the program director or the ADA Coordinator either verbally or in writing ten (10) working days in advance of the event or activity for which the material is needed. Reasonable effort will be made to meet requests made less than ten (10) days before an event or activity.
2. The materials will be provided in the requested format at no charge.
3. Primary consideration will be given to the format preferred by the person making the request, and the Town of Adams will decide whether to provide the preferred format or an effective alternative format.
4. If a request cannot be met the person making the request will be informed as soon as possible but at least two (2) days in advance of the event or activity.
5. The Town Administrator will make final decisions regarding any request that may represent an undue financial or administrative burden.

### C. Interpreter Service Policy

It is the policy of the Town of Adams that sign language interpreters, will be provided upon request to any person needing interpreter services in order to participate in any meeting, program or activity of the Town. Requests should be generally made at least 30 working days in advance of the scheduled event or meeting, but reasonable effort will be made to meet requests made on shorter notice. Requests should be made either verbally, by relay operator, or in writing to a, program director or the Town Clerk.

Within four (4) hours of the receipt of the request, the Town Clerk or other responsible employee will contact the Massachusetts Commission for the Deaf and Hard of Hearing (MCDHH), phone (617) 695-7500 to schedule the interpreter service.

In addition to MCDHH, the Town of Adams maintains a list of names and phone numbers of at least three (3) qualified freelance sign language interpreters working in the region. If informed that MCDHH has not been successful in scheduling interpreters as requested, staff of the Town of Adams will immediately attempt to contact and schedule a freelance interpreter. If an interpreter cannot be obtained, the Town Clerk or other member of the staff will offer the option of an alternative effective form of communication or the opportunity to postpone the meeting until such a time as an interpreter can be scheduled.

### D. Assistive Listening Device Assurance

It is the policy of the Town of Adams that assistive listening devices will be provided upon request to persons needing such devices to participate in programs, services and activities of the Town. Assistive listening devices are available with appropriate notice through the Town of Adams and will be provided upon notice given to the Town Clerk's Office at least five (5) working days before the scheduled event or activity.

#### E. TV Captioning

It is the policy of the Town of Adams that when a television is used to provide services, the television will be equipped with a captioning decoder chip and staff will be trained to use it.

#### F. Video Assurance

It is the policy of the Town of Adams to provide captioned versions of video tapes when such captioning is available in order to ensure that presentations are accessible to all individuals with disabilities. Captioning can be obtained through The Caption Center, 125 Western Avenue, Boston, MA 02135.

#### G. Training Assurance

It is the policy of the Town of Adams that staff training and other staff development activities provided by Town personnel and volunteers including training on the use of the operator relay service, and other equipment necessary to assure effective communication, personnel also receive training in procedures and policies on receiving and handling requests for auxiliary aids and services and for ensuring that primary consideration is given to the type of service or format preferred by the person with disability: Training on effective communication is given during orientation and at scheduled in-service programs.

## Program and Facility Accessibility

It is the policy of the Town of Adams that all services are provided in locations that are accessible under the ADA. The Town of Adams ADA Self-Assessment & Transition Plan is included in Attachment B. It must be noted that the Town of Adams does not provide services in all of the locations listed in the report. Additionally, when the Town of Adams provides services in a location not directly owned and operated by it, the location must be ADA accessible.

Note: Sites operating Department of Public Health funded programs include the schools in the Adams Cheshire Regional School District system. An inventory per the Department of Public Health requirements has been performed, and all sites are ADA compliant.

## Snow Removal

Under Title II of the ADA, municipalities are required to ensure that all the programs and services they provide are accessible to individuals with disabilities, including municipal streetscapes. Timely and thorough snow clearing of all sidewalks and accessible routes is essential for supporting people's safety and independence.

For individuals with mobility impairments, inadequate snow removal can create significant obstacles, making it difficult to navigate icy sidewalks, ramps, or crosswalks. Thus, limiting access to essential services and reducing a person's independence.

After a snowstorm, the municipality is responsible for snow removal from all public rights of way under their control, including accessible elements such as sidewalks, crosswalks, curb cuts, on- and off-street accessible parking, ramps, and stairs. Failure to remove snow and ice in a timely and effective manner can result in injuries, personal injury lawsuits, and disability rights related lawsuits.

In accordance with Title II, 2010 ADA standards 302.1 states, floor and ground surfaces shall be *stable, firm, and slip* resistant and shall comply with 302. Similarly, the Massachusetts Architectural Access Board (MAAB) 521 CMR 22.5 states, walkway surfaces shall be stable, and firm and shall lie generally in a continuous plane with a minimum of surface warping.

According to the Massachusetts of on Disabilities, snow and ice must be cleared down to the pavement and treated with an ice-melt to ensure a clear path of travel that is safe, slip resistant, and a minimum of 36 inches wide (or as wide as the sidewalk if the sidewalk is narrower than 36 inches).

Municipalities have the ability to delegate snow and ice removal from property owners. Adams voters approved a bylaw requiring property owners to clear snow from the sidewalks that abut their property. In 2018 town meeting last amended Ch 105 § 105-2 of the town's bylaws to reads as follows:

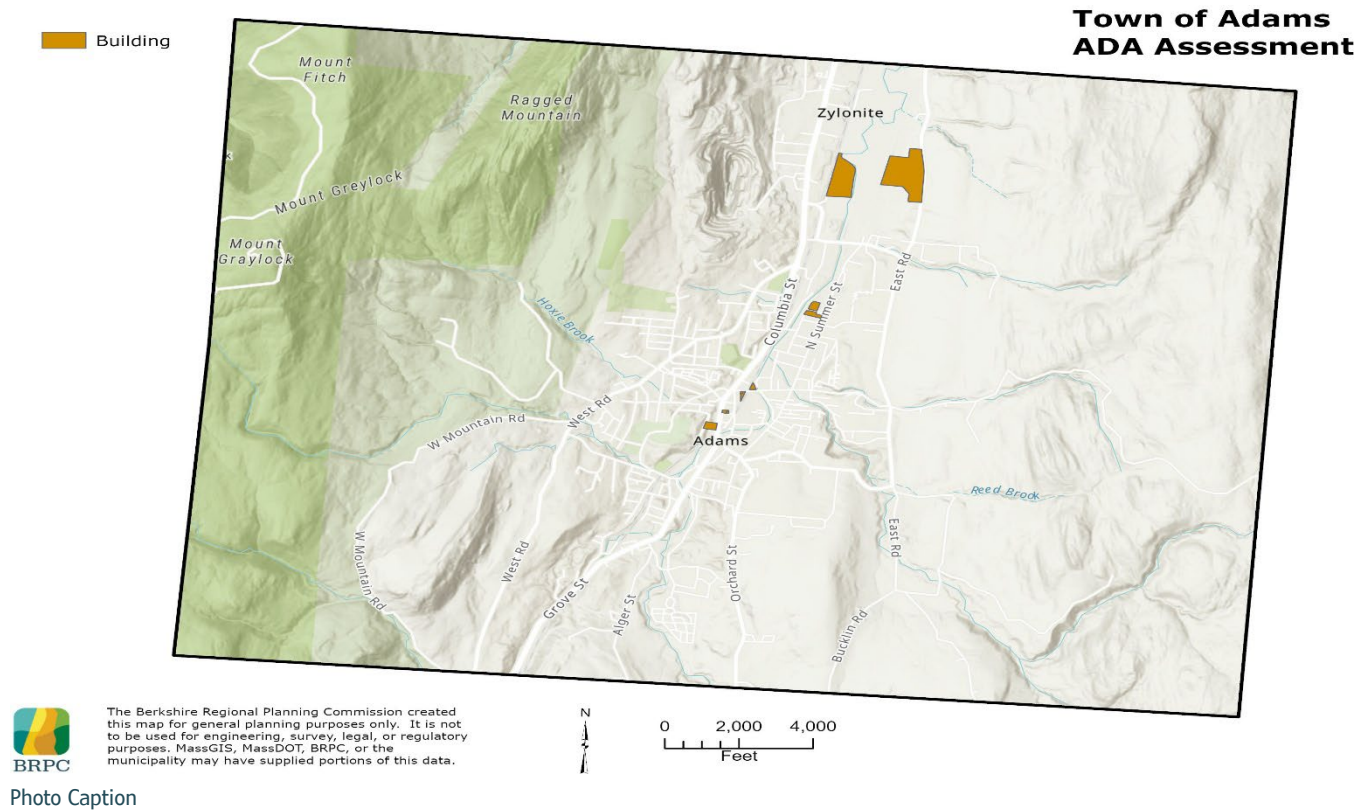
*A. Removal from sidewalks required on all streets. The tenant and, in case there is no tenant, the owner or any person having the care or control of any building or lot land bordering on any street or parts or portions of streets within the limits of the Town shall not allow any snow or ice to remain upon any sidewalk in front of such lot or building for 24 consecutive hours but shall cause the same, within that time, to be reasonably removed from the entire width of such walks. In the event that snow and ice on a sidewalk have become so hard that they cannot be removed without the likelihood of damage to the sidewalk, the person or entity charged with their removal shall, within the time mentioned herein, cause enough sand or other abrasive to be put on the sidewalk to make travel thereon reasonably safe and shall then, as soon thereafter as weather permits, cause said sidewalk to be thoroughly cleaned.*

*B. Throwing or pushing in public way. No person shall shovel, plow, push or throw snow or ice out into a public way.*

*C. Erection and maintenance of gutters and barriers. Every owner of a building adjoining a street or public way shall erect and maintain suitable barriers, gutters and conduits or some other suitable measure to prevent the falling of snow, ice, rainwater and melted snow and ice from such building upon any person traveling or passing in such street or way or upon any sidewalk or footway.*

Enforcement of the bylaw helps the town comply with its responsibility to provide adequate routes to the services. However, someone with a disability may not be able to clear snow in front of their property. **The Massachusetts Office on Disability urges, but does not require, communities to create volunteer programs to assist people who cannot clear snow and ice.** The Massachusetts Office on Disability cites the city of Somerville's teen snow shoveling program, which pairs local high school students with homes to clear snow in exchange for community service credits, as an example.

# Evaluation of Town-Owned Buildings





## Adams Free Library

The Adams Free Library is a historical building downtown. Staff serve approximately 1,600 patrons per month, connecting visitors with educational material and programming. The library also hosts several community events.

Located on Park Street, the library originally served as a gathering place for the Grand Army of the Republic Post 126, a Civil War monument, and a library. The building opened two years later in 1899.

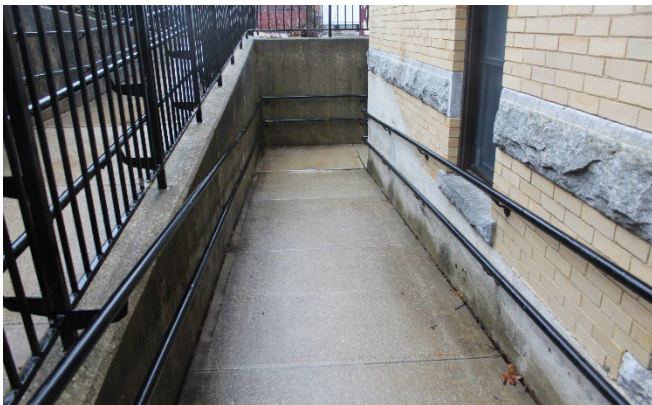
The library renovated the building extensively in 2014 with a focus on increasing accessibility. The library serves the community with educational material. The upstairs meeting hall remains a public meeting and features several historic relics, and a downstairs meeting space provides another area for town gatherings.

The library is accessible.

### Priority 1 - Approach and Entrance

There is no parking lot located on the library property. The town installed accessible parking spaces on the street both in front of the library and located near an accessible entrance on Maple Street.

The front entrance is not wheelchair accessible because the only path consists of stairs. There is no ramp to get into the building from Park Street. There is a sign located at the accessible parking space on Park Street indicating where the accessible entrance is located and the sidewalk extends to the Maple Street entrance.



The ramp provides accessibility to the library.



The Adams Free Library is a historic building located on Park Street.

There is another on-street accessible space on Maple Street. The curb ramp from Maple Street to the sidewalk and approach to the building is designed to be accessible but is showing signs of deterioration. **The town should repair the roadway and curb ramp to ensure a smooth surface.**

There is an accessible switchback ramp to the lower level of the building. The door features a push-button opener and there is a call box for visitors to ask for service if the door is locked or malfunctioning.

### Priority 2 – Access to Goods and Services

The goods and services are provided on each of the three floors of the building. A rear addition to the main floor of the building is a half-floor up from the remainder of the main floor, which is mitigated by an accessible elevator that provides access to all floors, including the second level of the main floor.

Upon entering the building through the accessible entrance, visitors enter an open room. The space is used for programs, events, and meetings and has no barriers to accessibility.

The main floor features offices, book stacks, public computers, and sitting areas. Most elements are accessible.



The library installed tactile and braille signs informing people who to obtain assistance.

One corner of the bookstack is inaccessible because of space limitations. There is a sign recognizing the potential accessibility challenge and asking anyone who would like assistance to ask a staff member.

The top floor is the historic meeting area. The area is mostly open space and is accessible.

### Priority 3 – Toilet Rooms

Each floor has a public restroom. The basement level and the main floor are both accessible. The bathrooms on the third floor are not accessible. The restrooms on the third floor have historical significance and the library added signs at the restroom's entrance indicating that the accessible restroom is located on the main floor.



The toilet paper dispenser is located too far from the toilet.

The other restrooms are mostly accessible.

**The main floor restroom's toilet paper dispenser is located too far from the toilet seat.** The center of the paper roll is approximately one foot from the edge of the toilet, which exceeds the 7-9" range detailed in 604.7 of the 2010 ADA Standards. 521 CMR does not address the distance from the toilet seat.

The door to the restrooms measured above 5 lbs. minimum of pressure to open as detailed in 404.2.9 of the 2010 ADA Standards and 521 CMR 26.8.1 (b).

The coat hook measures at approximately 55" from the ground, which exceeds 603.4 of the 2010 ADA Standards. MAAB's requirement is 54". Coat racks installed prior to 2010 are safe harbored under the ADA at 54". To meet the most up to date standards, the town should lower the coat rack to 48".

### Priority 4 – Additional Access

There are no other elements the Department of Justice considers under Priority 4.



The coat rack in the bathroom is too high.



## Adams Memorial Middle School

The former middle school located on Columbia Street is mostly vacant. The town uses only the gymnasium for town meeting and town elections. The location is also an emergency evacuation center.

The town is in the process of selling the building to a private developer. The developer is expected to renovate the majority of the building into housing units and lease a small portion of the building back to the town. The renovation will include a full renovation of the public restrooms currently used for town meeting and voting.

Voting and town meeting is mostly accessible.



Voting and town meeting takes place in the gym.

### Priority 1 - Approach and Entrance

There are two dedicated accessible spaces near the entrance to the building, which is a sufficient number. The slopes of the parking spaces and pathway to the school exceed maximum grades for slope and cross slope detailed in 403.3 of the 2010 ADA Standards and 521 CMR 20.9. Slopes must not exceed 5% and cross slopes must not exceed 2%.

The town needs to adjust its parking and repave to ensure there is an accessible route into the building.

After parking and navigating the parking, there is an accessible ramp into the building.



The slope of the parking lot exceeds ADA maximums.

### Priority 2 – Access to Goods and Services

The services provided are located inside the gymnasium directly to the left after entering the building. The space is wide open and staff place chairs on the court surface during town meeting.

There is a change in level above the 1/4" maximum established by 404.2.5 of the 2010 ADA Standards and 521 CMR 26.10.1. The threshold should be changed.

### Priority 3 – Toilet Rooms

There are two accessible bathrooms available to the public. However, accessing the bathrooms require a

person to navigate down a hallway with multiple thresholds protruding above ¼" which does not comply with 404.2.5 of the 2010 ADA Standards and 521 CMR 26.10.1.

### Priority 4 – Additional Access

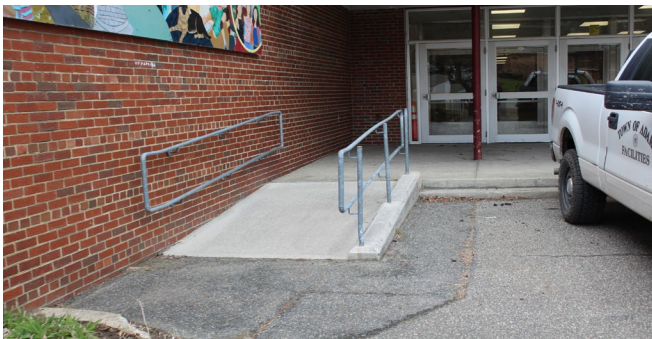
The only elements the Department of Justice considers under Priority 4 present are multiple water fountains but all of them are decommissioned and no longer working.



Thresholds throughout the building are not compliant.



The accessible restrooms are compliant.



An accessible ramp provides access to the building.



The doors to the gym provide sufficient space but have a threshold that needs to be lowered.

## Adams Station

The town purchased a former car wash and transformed it into a train station. The facility is the loading and unloading location for the Berkshire Scenic Railway. It is accessible.

### Priority 1 - Approach and Entrance

There is no public parking located on the site. The station is located across the street for the Adams Visitor's Center, which has sufficient accessible parking.

Visitors walk across accessible paths and curb cuts to get access to the station and the train cars. The building features garage space for storage and accessible bathrooms.

Additionally, there is a small park space which features accessible tables, one of which is located on the accessible path.

There are no accessibility barriers related to the approach and entrance to the station.

### Priority 2 – Access to Goods and Services

The Ashuwillticook Rail Trail provides access to the train station. There are no accessibility barriers.

### Priority 3 – Toilet Rooms

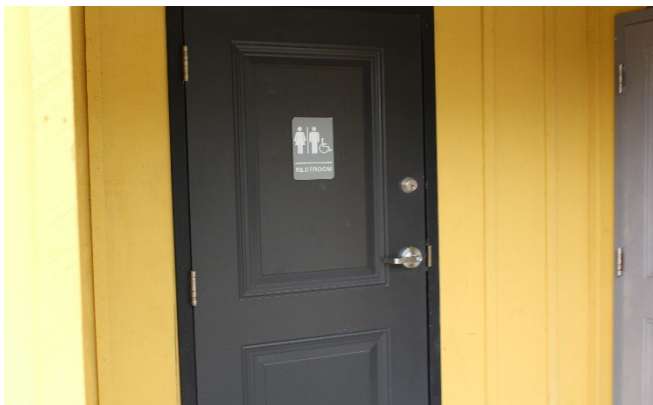


Adams Station is a former car wash that is now home to the Berkshire Scenic Railway.

There are two toilet rooms located in the Adams Station building. Both are unisex and signed as accessible.

The signage is tactile but is not located on the latch side of the door at a height of 48" and 60" from the floor as required by Section 703 of the 2010 ADA Standards and 521 CMR 41.00. Additionally, the town needs to provide 18" of clear floor space underneath the signs for a person to read them without getting hit by the opening door.

The drainage pipes under the sinks do not comply with 606.5 of the 2010 ADA Standards and 521 CMR 30.9.5. The pipes should be covered to prevent someone from hitting their legs on them.



Signs should be located on the latch side of the door with at least 18" of clear floor space underneath them.



### Priority 4 – Additional Access

There are no elements on the property the Department of Justice considers under Priority 4.



There is an accessible table located on an accessible route.



The pipes underneath the sink must be covered.



There is an accessible route throughout the property.



Access to the train is accessible.



## Greylock Glen Outdoor Center

The newly constructed Greylock Glen Outdoor Center opened in October 2024. The building features restrooms, meeting spaces, a commercial kitchen, display space, and classrooms. The center provides access to the Greylock Glen, which provides passive recreational opportunities.

The new outdoor center is accessible.

### Priority 1 – Approach and Entrance

There is sufficient accessible parking located on the property. There is an accessible path into the building. There are no accessibility barriers.



The new outdoor center is fully accessible.

### Priority 2 – Access to Goods and Services

All goods and services provided at the facility are accessible.

### Priority 3 – Toilet Rooms

There are fully accessible toilet rooms in the building.

### Priority 4 – Additional Access

There is a compliant water fountain located inside the building.

## Northern Berkshire Registry of Deeds

The Registry of Deeds, located on Park Street, is the regional office for land use records. The building is shared with the Police Department. The registry is the former town hall and courthouse. The offices occupy one floor with multiple rooms of records.

The building is currently not accessible because a wheelchair lift upon entering the property is out of order. **Fixing the lift should be the registry's top priority.**

### Priority 1 - Approach and Entrance

There is a small parking lot next to the building, which primarily serves the Police Department. Visitors to the Registry of Deeds are more likely to park in accessible spaces on Park Street.

There are accessible curb cuts from the street to the sidewalk. From the sidewalk, visitors travel up an accessible ramp to the front doors, which feature push-button door openers.

There are stairs immediately upon entering the building. **There is a wheelchair lift but it is out of service.**

### Priority 2 – Access to Goods and Services

After transcending the stairs or utilizing the lift to access the main hallway, there is an office to the right. The counters there are too high. The service counters at the registry are 42" off the ground which is not in compliance with 904.3.2 of the 2010 ADA Standards and 521 CMR 7.2.1 (c). The 2010 ADA Standards limit counter height to 38" while 521 CMR requires at least one portion of the counter to be 36" high.



The lift is currently out of order, rendering the building inaccessible.



The Berkshire North District of the Registry of Deeds is located in a town-owned building on Park Street.

The building does not have audible and visible alarms as required by 702.1 of the 2010 ADA Standards and 521 CMR 40.3.

There are door knobs throughout the building, which are not compliant with 309.4 of the 2010 ADA Standards and 521 CMR 26.11.1. Door hardware must be operated easily with one hand and does not require tight grasping, pinching, or twisting of the wrist.

### Priority 3 – Toilet Rooms

There are no public toilet rooms available in the Registry of Deeds.

### Priority 4 – Additional Access

There are no elements the Department of Justice considers under Priority 4 at the Registry.



There are door knobs throughout the building.



The counters are too high.



The records are mostly located within reach ranges, except for those on the bottom, but the tables are too high to be usable for someone in a wheelchair.



There is an accessible route into the building.



## Police Station

The Police Department is located on School Street. The facility is home for police functions, including being the emergency management command center. Police assist residents with firearm identification applications, fingerprinting for passports, and to meet with victims of crime.

### Priority 1 - Approach and Entrance

There is one space reserved for accessible parking lot in the small lot on School Street. **There is no van accessible parking which is not in compliance with 208.2.4 of the 2010 Standards and 521 CMR 23.2.2.**



The parking is not accessible.

Van accessible parking spaces can be eight-feet wide with an eight-foot access aisle or 11-feet wide with a five-foot accessible aisle. The space must also have a sign indicating that it is van accessible in accordance with 502.6 of the 2010 ADA Standards and 521 CMR 23.6.3.

The slopes of the parking spaces and pathway to the Police Department exceed maximum grades for slope and cross slope detailed in 403.3 of the 2010 ADA Standards and 521 CMR 20.9. The slopes and cross slopes must not exceed 5% and 2% respectively.

From the parking space, a visitor must travel down a sidewalk without an accessible curb cut.

### Priority 2 – Access to Goods and Services

The public enters the police station into a large open room. There is a compliant service counter.

### Priority 3 – Toilet Rooms



The trash can limits turning space.

There are two bathrooms. The bathrooms are accessible. However, turning space is restricted somewhat by trash cans. 521 CMR 30.7.2 requires there be at least 42" of clear floor space from the front edge of the water closet to the nearest wall or fixture and 304.3.1 of the 2010 ADA Standards requires 60" of turning space. The trash can protrudes into the space.

### Priority 4 – Additional Access

There is a compliant phone available at the Police Station.

## Town Hall

Town hall hosts the offices of the town administrator, town clerk, assessor, treasurer, DPW administration, Department of Community Development, town accountant, and is the primary location for public meetings.

The building was originally the home of C.T. Plunkett, an important historical figure in Adams' history, in 1906. The building later served as a youth center, American Legion, and then municipal offices. The town purchased the building in 1995.



The Adams Town Hall hosts the offices for most town departments.

### Priority 1 - Approach and Entrance

There are two parking spaces reserved for accessible parking on the northern side of the building. There is on-street parking and a parking lot at the rear of the building. **There is no signage on the street or in the upper parking lot indicating where the accessible parking spaces are located.**

The spaces do not have the appropriate slope and cross slope to comply with 403.3 of the 2010 ADA Standards and 521 CMR 20.9. The slopes and cross slopes of the parking spaces measure beyond the 5% limit on slope and 2% limit on cross slope. **The town should reconfigure the parking to ensure a level connection with the accessible route..**



The accessible parking should be reconfigured to provide easier access to the building.

The route into the building also requires repair. There are multiple sections of the accessible route in which the cross slope exceeds 2% in accordance with 403.3 of the 2010 ADA Standards and 521 CMR 25.6 and areas where there are changes in level beyond 1/4" which exceeds limits in 303.2 of the 2010 ADA Standards and 521 CMR 29.2.1.

Visitors also park on Park Street but there is no curb cut near the front walkway into town hall. The walkway leads to a set of stairs to enter the front door. **The stairs are not compliant and are failing.**



The front stairs need repair.

The treads and riser are not uniform. The riser exceed the 7" maximum and the treads exceed 11" maximum in depth in accordance with 504.2 of the 2010 ADA Standards.

Additionally, the handrails do not have the 12" extensions at the top and bottom in accordance with 505.10.1 of the 2010 ADA Standards and 521 CMR 27.4.3. Lastly, there is another stair to enter the building, which is not wheelchair accessible.

The town does have an accessible entrance, which also needs significant improvements, so addressing the stairs is not a requirement for accessibility

purposes. Installing a sign directing people to the accessible entrance will suffice.

However, given the considerable amount of work required at both entrances, the town should consider addressing the front by adding a ramp or accessible pathway and accessible parking on Park Street.

There is also parking available in the privately-owned parking lot on the southern side of town hall but the nearest entrance to those spaces require one to traverse up a steep hill and there is a step to enter the building. It is not accessible.

### Priority 2 – Access to Goods and Services

The town hall spans four floors with various offices providing different services. A compliant elevator provides access to each floor.

The basement serves the building department and the office of the state representative as well as other staff-only spaces. State Rep. John Barrett III's office previously served as the Veteran's Services office and the sign is currently paper taped over the former office sign and should be replaced with a tactile sign to comply with 216.2 of the 2010 ADA Standards and 521 CMR 41.1.1.

Throughout the building the signs are inconsistent. 703.4.1 of the 2010 ADA Standards require the mounting height of tactile characters to be between 48" and 60" from the floor and 521 CMR 41.2.2 require the centerline of the sign to be located 60" from the floor.

There are also no signs on the boiler room and server room. While tactile signs are only required where they are provided in permanent spaces, the inconsistency could pose a challenge for someone with visibility impairments. Additionally, the boiler room does not have hardware with knurled or



The sign to the state representative's office should be purchase and installed to comply with accessibility standards.



rough surfaces to warn people with visual impairments of a hazardous area, which is required by 521 CMR 26.11.4.

The building inspector's office features a compliant service counter.

The first floor includes the offices of the town clerk, assessor, and tax collector. Each office has a compliant service counter. There are two rooms on the first floor for government meetings. Both are accessible.

A sunroom area currently used only for staff meetings is not accessible because access to it requires a step down. The step exceeds the  $\frac{1}{4}$ " limit for a change in level on an accessible route detailed in 303.2 of the 2010 ADA Standards and 521 CMR 29.2.1.

The second floor includes the town administrator's office. The sign to the town administrator's office does not have the 18" of floor space required by 703.4.2 and 521 CMR 26.6.3 (a) underneath because it is obstructed by a table.

The third floor features the Office of Community Development. The offices are accessible.

### Priority 3 – Toilet Rooms

There are public toilet rooms located on the first, second, and third floor.

The men's room on the first floor is mostly accessible. The door requires approximately 10 lbs. of pressure to open, which exceeds 404.2.9 of the 2010 ADA Standards and 521 CMR 26.8.1 (b). The door closer needs to be adjusted to ensure that someone must only use a maximum of 5 lbs. of pressure to open.



The toilet paper dispenser is located too far from the toilet.



The radiator in the women's room limits the clear floor space in front of the toilet.

The coat rack is 54" off the ground, which exceeds 603.4 of the 2010 ADA Standards. MAAB's requirement is 54". Coat racks installed prior to 2010 are safe harbored under the ADA at 54". To meet the most up to date standards, the town should lower the coat rack to 48".

The trash can in the stall limits maneuverability. 521 CMR 30.7.2 requires there be at least 42" of clear floor space from the front edge of the water closet to the nearest wall or fixture and 304.3.1 of the 2010 ADA Standards requires 60" of turning space. The trash can protrudes into the space.



The women's room has similar challenges with the addition that the radiator protrudes into the 42" of clear floor space in front of the toilet required by 521 CMR 30.7.2.

The toilet room in the town administrator's office and one on the third floor is not accessible for a multitude of reasons. The bathrooms need to be completely renovated to become accessible.

There is no signage directing people to the accessible restroom on the first floor, which is required by 216.8 of the 2010 ADA Standards.

The bathroom on the third floor is also not accessible. Entering the restroom requires the use of a door knob, which is not in compliance with 309.4 of the 2010 ADA Standards and 521 CMR 26.11.1.

The sink is not accessible. The soap dispenser is mounted 50" above the floor, which is out of reach ranges defined in 308.2 of the 2010 ADA Standards and 521 CMR 6.5.

The toilet paper dispenser is located approximately 12" from the edge of the toilet, which is not in compliance with 604.9.6 of the 2010 ADA Standards. The standards specify that dispensers are located between 7" and 9" from the edge of the toilet seat to the center of the toilet paper dispenser.

### Priority 4 – Additional Access

There are no elements at Town Hall the Department of Justice considers under Priority 4.



There is some inconsistency with signage throughout the building. MAAB requires signs to be 60" from the centerline of the sign to the ground.

## Visitor's Center

The Visitor's Center is home to the Council on Aging and Thunderbolt Ski Museum. The Council on Aging hosts a variety of events and provides services for the older adult population, including meal service, tax assistance, an accessible transportation. The Council on Aging also partners with United Cerebral Palsy to provide visitors with assistive technology to increase accessibility to all town assets. The Visitor's Center abuts the accessible Ashuwillticook Rail Trail.

The building is accessible.

### Priority 1 - Approach and Entrance

There is sufficient accessible parking, four spaces, all located near the entrance. There are two van accessible spaces.

The curb ramp on the Hoosac Street side of the parking lot has a slope of 10.6%, which exceeds the 8.3% maximum established in 405.2 of the 2010 ADA Standards and 521 CMR 21.3.

There is an accessible pathway from the parking lot to the accessible entrances on both sides of the building. The town is currently in the process of installing a push-button door on the front entrance and would benefit from another one on the entrance facing the rail trail.



The town constructed the Visitor's Center in 2002.

### Priority 2 – Access to Goods and Services

The two-story building features a museum, restrooms, and program spaces on the first floor and offices on the second floor. The spaces are accessible.

In the large event room, coat hooks measure at 64" off the ground, which exceeds the maximum reach range of 48" as defined in 308.2 of the 2010 ADA Standards and 521 CMR 6.5.

A chair is blocking the 18" of space required under 703.4.2 of the 2010 ADA Standards and 12" under 521 CMR 26.6.4 to the stairwell in the large event space.



The slope of the curb ramp measures at 10.3%, which exceeds the 8.3% maximum.

There is no tactile and braille signage for the program room as required by 216.2 of the 2010 ADA Standards and 521 CMR 41.1.1. Additionally, there is no sign for the kitchen area and the refrigerator is blocking the area in which a sign is required.

In the museum space, there is a display case that is a protruding object. Objects between 27" and 80" off the ground are not detectable by a cane and cannot extend more than 4" from the wall in accordance with 307.2 of the 2010 ADA Standards and 521 CMR 20.6.1. The town needs to place something under the object that is detectable by a cane.

The upstairs space consists of offices for the Council on Aging, Northern Berkshire Waste Management District, and Veterans Services Officer.

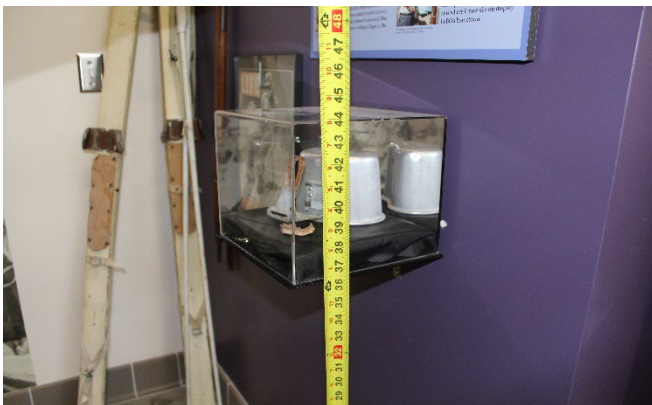
The Northern Berkshire Waste Management District sign is obscured by a mailbox. The mailbox should be moved.

### Priority 3 – Toilet Rooms

There are toilet rooms on both floors of the building. The bathrooms on the first floor are compliant.

The bathrooms on the second floor's doors exceed the 5 lbs. of pressure to open as defined in 404.2.9 of the 2010 ADA Standards and 521 CMR 26.8.1 (b). The door requires approximately 6 lbs. of pressure to open.

The bathrooms are both unisex according to paper signs placed over the existing signage. The paper signs are not compliant with the requirements in Section 703 of the 2010 ADA Standards and 521 CMR 41.



The display case is a protruding object.



The signs for the upstairs bathrooms are not compliant.

The toilet paper dispenser is approximately 1 foot from the toilet, which exceeds the 7-9" required range detailed in 604.7 of the 2010 ADA Standards. 521 CMR does not address the distance from the toilet seat.

### Priority 4 – Additional Access

There is a compliant water fountain on the first floor. There is a phone in the program room that is located outside of the 48" maximum for reach range.

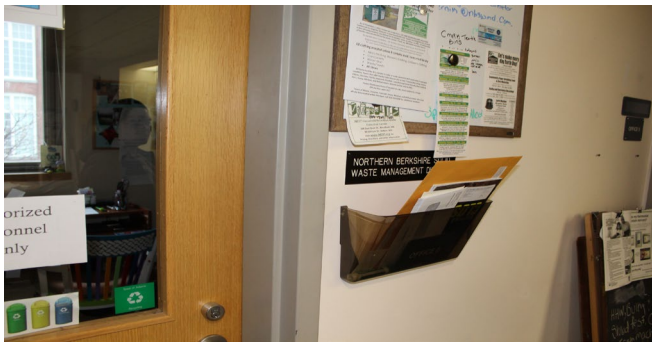
as detailed in 308.2 of the 2010 ADA Standards and 521 CMR 6.5. The phone should be lowered.



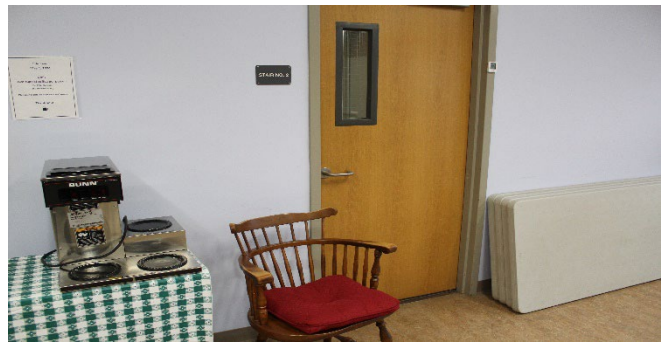
The main service counter is accessible.



Doors that require more than 5 lbs. of pressure are not compliant.



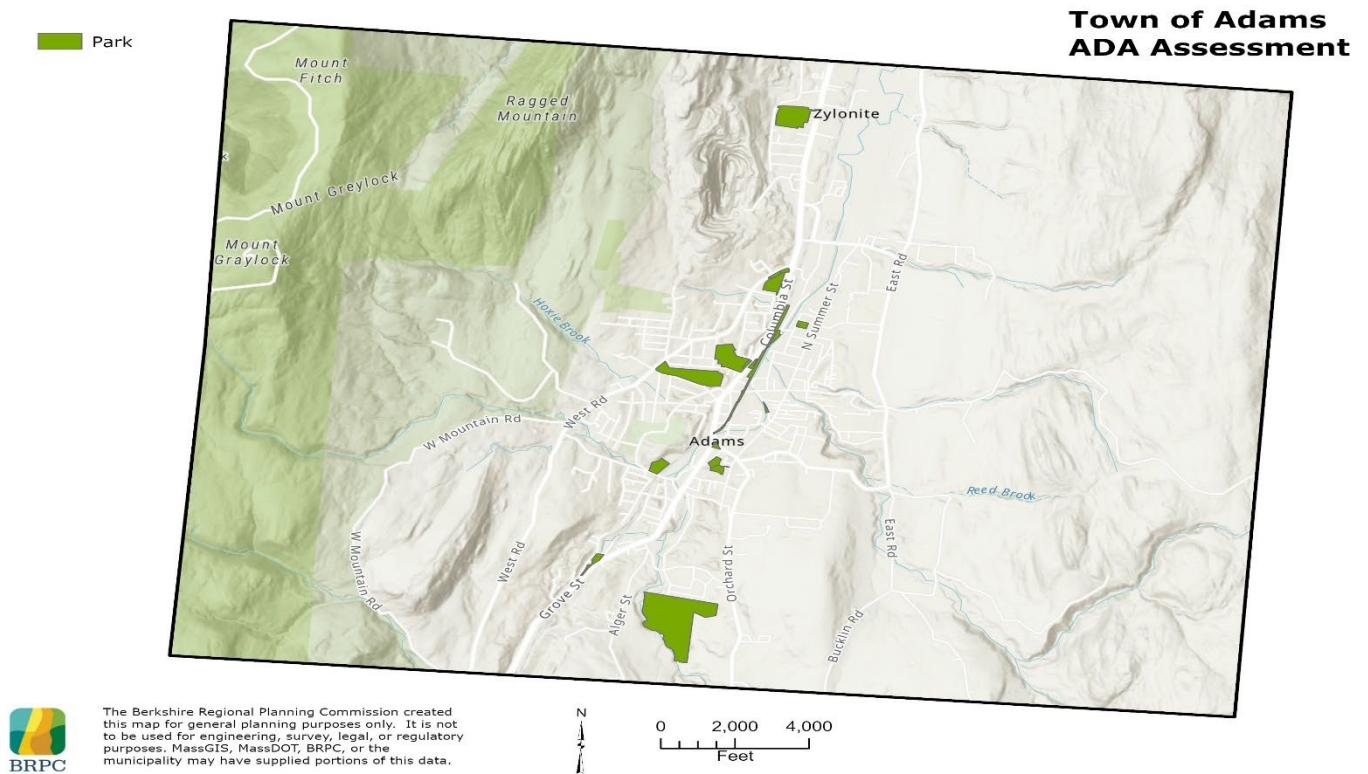
The mail box blocks the sign.



The chair eliminates the required 18" of clear floor space next to the door.



# Evaluation of Town-Owned Parks and Open Spaces



# Albert Reid Park

The 1.47-acre Albert Reid Park on Crotteau Street features a baseball and softball field, playground, swing set, and concession stand.

The park is mostly accessible, except for the playground.

### Priority 1 - Approach and Entrance

There are approximately **eight parking spaces** available on Crotteau Street to access the park. **None of them are accessible, which does not comply with 208.2 of the 2010 ADA Standards or 521 CMR 23.2.1.**



None of the parking spaces are accessible.

The ADA and MAAB require at least one accessible parking space. The space must be van accessible. Van accessible spaces must be at least 11-feet wide and have a five-foot access aisle or eight-feet wide with an eight-foot aisle. The aisle must be painted with diagonal lines.

There is an accessible path from the parking spaces into the park.

### Priority 2 - Access to Goods and Services

There is an accessible route to the concession stand, the playing field, spectator seating, and the swing set.



There is no accessible route to the playground.

A swing sets on the western portion of the property have transition ramps into the play area.

There is no accessible route to the playground on the eastern portion of the property, which is not in compliance with 206.2.2 of the 2010 ADA Standards or 521 CMR 19.7. The playground is inaccessible.

### Priority 3 - Toilet Rooms

There is no toilet room available on site.

### Priority 4 - Additional Access

There are no other features the Department of Justice considers under Priority 4.

## Ashuwillticook Rail Trail Pocket Park

The town owns a small park at the Pleasant, Depot and School Streets. The park provides rail trail users with a small space to rest. It is accessible.

### Priority 1 - Approach and Entrance

There is no parking provided onsite. There is an accessible route from nearby on-street parking into the park.

### Priority 2 - Access to Goods and Services

The park only features benches. The entire property is a firm and slip resistant surface.

The park would benefit from an accessible bench.

### Priority 3 - Toilet Rooms

There are no toilet rooms located on the property.

### Priority 4 - Additional Access

There are no elements the Department of Justice considers under Priority 4 located at the park.



The pocket park provides visitors a place to rest and access the Ashuwillticook Rail Trail.



## Cook Street Park

The Cook Street Park is a new addition to the town's park system. The park features some sitting areas and a fenced in dog area. The park is accessible.

### Priority 1 - Approach and Entrance

There is one accessible parking space located on the property. The space is paved and features aisle access.

The sign is too low and does not comply with 502.6 of the 2010 ADA Standards and 521 CMR Section 23.6 which requires the base of the sign to be a minimum of 60" from the ground.



There is a paved accessible parking space at the park but the sign is not located at least 60" from the ground.

The space is not designated for vans. 208.2.4 of the 2010 ADA Standards and 521 CMR 23.2.2. requires at least one space be accessible and appropriately signed as such. The parking space is sufficiently large enough to accommodate vans. **The new sign should indicate that it is van accessible.** The pavement extends from the parking lot to the entrance of the park, providing an accessible route to enter.



The newer park has a walkway to the dog park.

### Priority 2 - Access to Goods and Services

There is an accessible route through the park.

There are a sufficient number of benches located on a firm surface instead of the grass located on the property

### Priority 3 - Toilet Rooms

There are no toilet rooms located on the property.

### Priority 4 - Additional Access

There are no elements at the park that the Department of Justice considers under Priority 4.

## George Bowe Field

Bowe is a 13.9-acre property on Old Columbia Street. The town owns the property, but it is not accessible to the public unless there is an event. The property features a gazebo, restrooms, and multiple storage buildings.

The town leases the building to those looking to hold events. For years Bowe Field was the location of the Adams Agricultural Fair but the organization no longer leases the property. Currently, there are several other organizations that host events.

The property is not accessible.



Bowe Field is leased to private entities for events.

### Priority 1 - Approach and Entrance

Parking for events occurs in an open grass area inside the park's confines. There is a sign for an accessible space next to the entrance to the event space.

The parking space is not on a firm surface in accordance with 502.4. of the 2010 ADA Standards and 521 CMR 23.4.4. There are no lines delineating the space in accordance with 521 CMR 23.4.5, which requires spaces to be marked with high contrast painted lines or other high contrast delineation. It is not van accessible. The ADA and MAAB require at least one accessible parking space. The space must be van accessible. Van accessible spaces must be at least 11-feet wide and have a five-foot access aisle or eight-foot wide with an eight-foot aisle. The aisle must be painted with diagonal lines.

The base of the signs measure at approximately 49" from the ground, which is not in compliance with 502.6 of the 2010 ADA Standards and 521 CMR 23.6.4. The sign should be a minimum of 60" from the ground.



There is an accessible parking sign located near the entrance to the park area. However, it is not a firm and slip resistant surface.

There is no accessible route from the parking space to the event space in accordance with 206.2.1 of the 2010 ADA Standards and 521 CMR 20.2.1.

### Priority 2 - Access to Goods and Services

Events mostly utilize the gazebo and outdoor space. There is a small animal barn which the agricultural fair used for to show chickens and other small animals. There is a storage unit and one building that could also be used for display space.



None of the spaces are accessible. There is no accessible route from the parking to any of the elements in accordance with 206.2.2 of the 2010 ADA Standards and 521 CMR 20.2. The accessible routes should be firm surfaces, at least three feet wide, be less than 5% of a slope and less than 2% of a cross-slope, and have no changes in level, all further detailed in Chapter 4 of the 2010 ADA Standards and 521 CMR 20.

The gazebo has a barrier around it which creates a change in level above  $\frac{1}{4}$ ", which is not compliant with 303.2 of the 2010 ADA Standards and 521 CMR 20.10. At one point there was an asphalt pathway connecting the gravel driveway in the park to the gazebo, which is now deteriorated.



The playground is not accessible.

There are two levels inside the gazebo. The raised level is accessible by a ramp. However, there are only compliant handrails on one side, which does not comply with 505.2 of the 2010 ADA Standards and 521 CMR 24.5.1.

There are picnic tables at the gazebo, the surface of which is packed gravel and not pavement, but none of them are accessible tables.

The other outbuildings both have changes in level to access and are not located on an accessible path in accordance with 303.2 of the 2010 ADA Standards and 521 CMR 20.10 and 206.2.2 of the 2010 ADA Standards and 521 CMR 20.2. The buildings are open spaces and have large garage doors to provide access. Items inside the out buildings currently limit maneuverability and usage as public space would require organizing the spaces currently used for storage.

Entrance to the standard-sized doors all have door knobs, which is not in compliance with 309.4 of the 2010 ADA Standards and 521 CMR 26.11.1. Door hardware must be operated easily with one hand and does not require tight grasping, pinching, or twisting of the wrist. The knobs should be replaced with lever sets.



The gazebo is bordered by a stone that creates a significant change in level, rendering the gazebo inaccessible.

Additionally, there is a playground on the property. However, the playground is located outside of the fence. Access to the playground is through a town right-of-way from Howland Avenue.

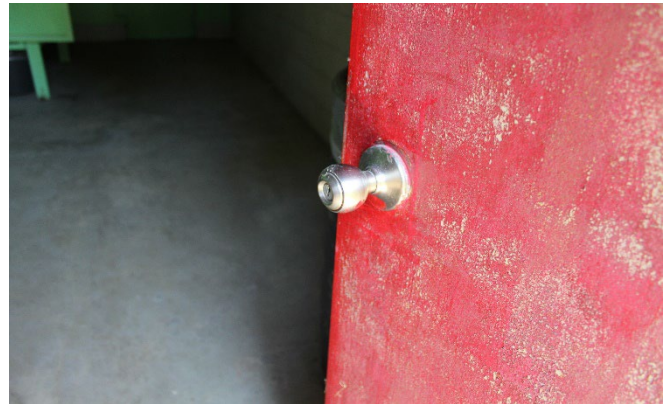
The playground is not accessible. There is no parking provided at the playground. There is no accessible route to the elements as required by 206.2.2 and 521 CMR 19.7.

The playground surface does not meeting American Society for Testing and Materials standards, required by 1008.2.6.2 of the 2010 ADA Standards.

There are insufficient ground-level play elements. 240.2.1.2 of the 2010 ADA Standards details the number of ground-level play components required.

### Priority 3 – Toilet Rooms

There are two restrooms on the property. Both men's and women's restrooms are not accessible and are located in an inaccessible building.



The door knobs on all buildings should be replaced with lever sets.

There is no accessible pathway to the restrooms, as required by 206.2.2 of the 2010 ADA Standards and 521 CMR 20.2. There is a concrete walk at the entrances. The concrete is becoming offset and in the approach to the men's room the cross slope exceeds the 2% maximum detailed in 403.3 of the 2010 ADA Standards and 521 CMR 20.9.

The bathrooms do not have appropriate signage. Signs spaces must adhere to Section 703 of the 2010 ADA Standards and 521 CMR 41.00. The requirement is that signs are tactile and located on the latch side and between 48" and 60" off the floor.

The concrete floor in both restrooms are elevated from the walkway, which creates a change in level above ¼" that is not compliant with 303.2 of the 2010 ADA Standards and 521 CMR 20.10. Additionally, the door's hardware are knobs, which is not in compliance with 309.4 of the 2010 ADA Standards and 521 CMR 26.11.1. Door hardware must be operated easily with one hand and does not require tight grasping, pinching, or twisting of the wrist. The knobs should be replaced with lever sets.

Upon entering the facility, there is a sink to the left. There is no mirror in the men's room. The sink has exposed water supply and drainage pipes under the sink, which does not comply with 606.5 of the 2010 ADA Standards and 521 CMR 30.9.5. Sink supply and drain links should be insulated or guarded.



There are no grab bars on any of the toilets.

The paper towel dispenser is located approximately 56" from the ground, which is outside of reach ranges detailed in 308.2.1 of the 2010 ADA Standards and 521 CMR 6.5. Items cannot be located above 48" off the ground.

There is a noncompliant ambulatory toilet and a larger space water closet. The larger space provides better access because of its space but it is not accessible.

The toilet is located too far from the near wall. Wheelchair accessible water closets should be positioned to be 18" from the near wall, measured from the wall to the centerline of the toilet, in accordance with 604.2 of the 2010 ADA Standards and 521 30.7.2. The restrooms at Bowe measure approximately 25" from the wall. The approximately 7" difference in space from the wall reduces the space to the sink located near the far wall. 521 CMR 30.7.2 also requires there be 42" between the nearest fixture on the open side. Currently, the restrooms at Bowe Field have approximately 36" of space between the nearest fixture, which limits the ability for someone in a wheelchair to move next to the toilet to mount it.



The toilet paper dispensers and the flush controls in the women's room are inappropriately located.

There are no grab bars at any of the toilets in either restroom, which is required by 604.5 of the 2010 ADA Standards and 521 CMR 30.8.

The toilet paper dispensers are not appropriately located or the correct style to meet 604.7 of the 2010 ADA Standards and 521 CMR 30.7.6. Toilet paper dispensers should be located 7"-9" from the edge of the toilet and cannot be located above where the grab bars should be located at 33" to 36" from the ground.

There is an accessible sink located in the larger water closets but the water and drainage pipes are exposed, which is not in compliance with 606.5 of the 2010 ADA Standards and 521 CMR 30.9.5.

There are coat hooks located throughout both restrooms, all of which measure at approximately 52" from the ground, which adhered to prior ADA Standards but not the current ones. Coat hooks must not be mounted within reach ranges detailed in 308.2.1 of the 2010 ADA Standards and 521 CMR 6.5.

The flush control in the women's room bathroom is located on the wrong side. 604.6 of the 2010 ADA Standards and 521 CMR 30.7.5 require flush controls to be located on the open side of the water closet.



The toilets are located too far off the nearest wall and too close to the nearest fixture on the far side.

There are two mirrors in the women's room, which are located too high. 603.3 of the 2010 ADA Standards and 521 CMR 30.11 require mirrors to be located no higher than 40" from the ground. The mirrors at Bowe Field are located approximately 53" from the ground.

### Priority 4 – Additional Access

There are no additional elements at the park that the Department of Justice considers under Priority 4.



## Liberty Street Field

The Liberty Street Field is located behind Hoosac Valley Elementary School on Columbia Street. It features a playground for the pupils to use during school hours and the public to access when school is not in session. It is mostly accessible.

### Priority 1 – Approach and Entrance

There is one accessible parking space with an appropriately sized aisle. There is no sign, which is not compliant with 502.6 of the 2010 ADA Standards and 521 CMR 23.6.



A gate restricts access to the accessible route into the playground.

There is an accessible route into the playground.

However, a vehicle access gate restricts someone from the accessible path when it is closed. **The gate should be open for hours visitors can utilize the park, or the town can create a pedestrian access route next to the gate that connects with the accessible route.**

### Priority 2 – Access to Goods and Services

The playground features several accessibility elements including a bucket swing, firm safety mats under the material, and an accessible route into the playground.

There are two pathways to the playground. One of the paths is demonstrating signs of deterioration and is no longer in compliance with 303.2 of the 2010 ADA Standards and 521 CMR 29.2.3 which limits changes in level to  $\frac{1}{4}$ ". Additionally, an area of grass in the pathway is no longer in compliance with 302.1 and 521 CMR 29.1 because the route is no longer firm and slip resistant in that spot.

There are benches, an accessible picnic table, and trash cans that are not located on the accessible path in accordance with 206.2.2 of the 2010 ADA Standards and 521 CMR 20.2.1.

### Priority 3 – Toilet Rooms

There are no toilet rooms located at the park. There are toilet rooms available in the school but they are not public unless there is a special event.

### Priority 4 – Additional Access

There are no elements the Department of Justice considers under Priority 4 located at the park.

## Memorial Park

Memorial Park is located along Columbia Street, across the street from Memorial Middle School. The park is accessible.

### Priority 1 - Approach and Entrance

There is no parking located on the property. The ADA only requires accessible parking where parking is provided. Access to the park is from the sidewalk, which is accessible.

There is no nearby accessible parking. The closest accessible parking space is at Memorial Middle School but the grade of the hill exceeds the 5% maximum required for an accessible route.



Memorial Park is accessible.

### Priority 2 - Access to Goods and Services

The park features an accessible picnic table, memorials, and raised flower beds. All of the elements are located on an accessible route. **There are some visible signs of deterioration to the route, which will require repair to ensure a smooth surface.**

### Priority 3 - Toilet Rooms

There are no toilet rooms available on the property.

### Priority 4 - Additional Access

There are no elements the Department of Justice considers under Priority 4 located at the park.



## Quality Street Field

The 1.5-acre Quality Street Field provides visitors with open space access, a playground, and a swing set. The park is not accessible because there are no accessible routes providing access to the field.

### Priority 1 - Approach and Entrance

There is no parking provided on site and there are **no accessible routes providing access to the park** in accordance with 206.2.1 of the 2010 ADA Standards and 521 CMR 20.2.1.



The field does not have any accessible elements.

### Priority 2 – Access to Goods and Services

There is no accessible route connecting the park elements in accordance with 206.2.2 of the 2010 ADA Standards and 521 CMR 20.2.

There are no accessible elements at the park.

### Priority 3 – Toilet Rooms

There are no toilet rooms available on site.

### Priority 4 – Additional Access

There are no elements the Department of Justice evaluates under Priority 4.

## Renfrew Park

The town owns the 5.8-acre Renfrew Park, located on Friend Street. The site features a skate park, sports fields, concession/restroom/storage building, a playground, basketball courts, and a monument.

Renfrew Park is an accessible park.

### Priority 1 - Approach and Entrance

The parking lot features approximately 70 parking spaces, three of which are designated as accessible as required by the ADA. However, the signs are too low. The base of the signs measure at approximately 53" from the ground, which is not in compliance with 502.6 of the 2010 ADA Standards and 521 CMR 23.6.4.



The signs must be at least 60" off the ground.

### Priority 2 - Access to Goods and Services

The elements are all accessible.

### Priority 3 - Toilet Rooms

There is a restroom located on the property with limited availability to the public.

### Priority 4 - Additional Access

There are no features the Department of Justice considers under Priority 4 available on the property.

## Russell Field

The 3.7-acre Russell Field is located on Harmony Street. It features a baseball field, two playgrounds, tennis courts, and access to the Ashuwillticook Rail Trail, which is an accessible trail.

The park is accessible.

### Priority 1 - Approach and Entrance

Two of approximately 34 spaces in the parking lot are designated as accessible, which aligns with the required number of spaces in the ADA. However, one of the accessible parking spaces is missing a sign and is not in compliance with 502.6 of the ADA Standards or 521 CMR 23.6.1.



The northern accessible parking space is missing a sign and is not located closest to the accessible route to the playground.

Additionally, there are two accessible routes into the park, each accessing different features. The northern parking space, which is missing a sign, is not at the nearest entrance to the accessible route. **There is an accessible route to connect with the park, complying with 2010 ADA Standards, but it is not the "shortest accessible route of travel" as required by MAAB.** 521 CMR 23.3.1 requires that the parking is located on the "shortest accessible route of travel from adjacent parking to an accessible entrance."

The town should move the accessible parking space to the entrance that directly connects with the accessible route to the playground.



The accessible parking includes sufficient van loading and unloading space and is located next to an accessible route into the park.

### Priority 2 - Access to Goods and Services

There is a compliant accessible route connecting the parking lot to each feature in the park.

### Priority 3 - Toilet Rooms

There are no toilet rooms at Russell Field.

### Priority 4 - Additional Access

There are no elements the Department of Justice considers under Priority 4 located at the park.

## Siara Field

Siara Field is a small, undeveloped parcel of land at the end of Siara Street. The park is used for leisure activities but does not have any built-in elements for public use. The park is not accessible.

### Priority 1 – Approach and Entrance

There is no parking provided on the site nor on Siara Street. Additionally, there is no sidewalks on Siara Street. A visitor must park in an accessible on-street parking space on Summer Street and travel down Siara Street.



The park is an undeveloped parcel at the end of Siara Street.

### Priority 2 – Access to Goods and Services

The land is undeveloped. There are no constructed elements. There is no accessible pathway into the park.

### Priority 3 – Toilet Rooms

There are no toilet rooms located on the property.

### Priority 4 – Additional Access

There are no elements the Department of Justice considers under Priority 4 located at the park.



# Town Common

Located at the intersection of Park, Center, and Commercial Street, the Town Common features a monument, gazebo, benches, and trash cans. The park is accessible.

### Priority 1 - Approach and Entrance

There is no parking located on site. The ADA only requires accessible parking where parking is provided. Access to the property is from an accessible sidewalk and onto an accessible route to the elements.



The town common is accessible.

### Priority 2 - Access to Goods and Services

All park elements are located on an accessible route and are all accessible.

### Priority 3 - Toilet Rooms

There are no toilet rooms available on the property.

### Priority 4 - Additional Access

There are no elements the Department of Justice considers under Priority 4 located at the park.



# Valley Street Field

Valley Street Field features multiple soccer fields, baseball field, and bleachers. The park is mostly accessible.

### Priority 1 - Approach and Entrance

There are two accessible parking spaces located at the field. There is a lower-level parking lot but there is no signs directing people to the location of the accessible spaces. **The town could improve accessibility by installing a sign.**



Valley Street field is located behind Adams Memorial Middle School.

### Priority 2 – Access to Goods and Services

There is an accessible path to the bleacher and an accessible seating area. **The town could improve accessibility by providing a ramp onto the bleachers and dedicated accessible spaces which ensure adequate lines of sight.**

There is a picnic table that is not on an accessible route in accordance with 206.2.2 of the 2010 ADA Standards and 521 CMR 20.2.1.

### Priority 3 – Toilet Rooms

There are no toilet rooms available on the property.

### Priority 4 – Additional Access

There are no elements the Department of Justice considers under Priority 4 located at the park.

## Visitor's Center Park

The Visitor's Center Park is located along the Ashuwillticook Rail Trail. It features benches, a fire pit, raised gardens, and a connection to the accessible rail trail. It is a commonly used location for community events and other gatherings.

### Priority 1 - Approach and Entrance

The park is served by the Visitor's Center parking lot. There is sufficient accessible parking, including two van accessible spaces.

The curb ramp on the Hoosac Street side of the parking lot has a slope of 10.6%, which exceeds the 8.3% maximum established in 405.2 of the 2010 ADA Standards and 521 CMR 21.3.

### Priority 2 - Access to Goods and Services

The raised garden is located on the walkway to the Visitor's Center and it is accessible. The benches and fire pit are not located on an accessible path as required by 206.2.2 of the 2010 ADA Standards and 521 CMR 20.2.1.

Additionally, 521 CMR 19.5.2 requires that at least 5% of the tables are accessible. The Visitor's Center Park does not have sufficient.

The walkway from the sidewalk to the Ashuwillticook Rail Trail is too steep. The slope measured at 7.3%, which exceeds the 5% limit imposed by 403.3 of the 2010 ADA Standards and 521 CMR 20.9. The town can install compliant handrails to comport with the requirements of a ramp, which can have a slope as much as 8.3%.



The slope to the rail trail is too steep.



The Visitor Centers Park hosts community events and gatherings.

### Priority 3 - Toilet Rooms

There are two portable toilets located on site. Neither are accessible. Both toilets are standard sized, are not located on an accessible route, and there is no transition from the ground into the toilet. If a town provides restroom facilities in its park system, it must have accessible ones.

The town should rent one of the larger wheelchair accessible.

### Priority 4 - Additional Access

There are no additional features the Department of Justice considers under Priority 4 at the location.



The slope to the rail trail is too steep.



There is no firm and slip resistant path to the toilets.

### Winter Street Park

The town owns approximately a half-acre along the Hoosic River and Winter Street. The space is currently greenspace without any development. There are no accessible components available.

#### Priority 1 - Approach and Entrance

There is no parking provided on site.

#### Priority 2 - Access to Goods and Services

There is no development on the parcel.

#### Priority 3 - Toilet Rooms

There are no toilet rooms available on site.

#### Priority 4 - Additional Access

There are no elements the Department of Justice evaluates under Priority 4.



The park is not developed, nor it is accessible.



# Evaluation of Web and Mobile App Content

The town of Adam's has several online assets including webpages and social media platforms for the following municipal entities:

1. Adam's Town Hall
2. Adam's Free Public Library
3. Adam's Fire District
4. Adam's Housing Authority

To assess Adam's five online assets BRPC staff utilized SortSite Accessibility Checker. An online platform that complies with WCAG 2.1 Level AA standards and is regularly used by Disability Access Consultants - one of the nation's largest consulting firms specializing in accessibility compliance.

It is important to note that Automated testing cannot detect all accessibility issues, therefore it should be used alongside human testing.

Additionally, further human testing and analysis was conducted on the social media platforms of the above online assets and found that posts on town affiliated social media platforms do not meet WCAG 2.1 Level AA standards. **Some of the issues found include images lacking alt text, and videos do not have closed captioning.** Employees responsible for posting content to municipal social media platforms should be aware of the Meta's accessibility features and WCAG 2.1 Level AA standards.

## Adams Online Assets

### Adams Town Hall

The town uses third party vendors Civic Plus to create and publish their website, as well as using a different third-party vendor, DigiCert, for online bill paying. On the home screen residents can find the phone number to contact someone at town hall, however there is no formal accessibility statement present.

With CivicPlus municipalities can reach out to experts who will help local governments comply with WCAG standards.

Pages and files scanned through SortSite	
Level A	Level AA
<ul style="list-style-type: none"> <li>• Broken URL links.</li> <li>• All mouseover handlers should have an equivalent keyboard handler.</li> <li>• alt text should not be a meaningless image file name.</li> <li>• Document title must not be blank.</li> </ul>	<ul style="list-style-type: none"> <li>• Screen Reader and assistive technology test 1 issue               <ul style="list-style-type: none"> <li>◦ Ensure ARIA Roles Have the Required Parent Elements</li> </ul> </li> </ul>

<ul style="list-style-type: none"> <li>Figures and images in PDF documents should have non blank ALT text, except for decorative images which should be marked as artifacts.</li> <li>Link uses non-descriptive text like 'Click Here' with no surrounding text explaining link purpose.</li> <li>Links must have an accessible name</li> </ul>	<ul style="list-style-type: none"> <li>Ensures the contrast between foreground and background colors meets WCAG 2 AA minimum contrast ratio thresholds.</li> </ul>
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### Adams Free Public Library

The Adams Free Public Library website is managed by staff and features an accessibility widget that allows users to enhance text size, underline links, and changing background color contrast, just to name a few. Despite having the accessibility widget there are some issues SortSite accessibility scan and human testing found the site does not meet WCAG 2.1 Level AA standards.

Total 193 pages and files scanned through SortSite	
Level A – 10 issues on 30 pages	Level AA – 2 issues on 37 pages
<ul style="list-style-type: none"> <li>All mouseover handlers should have an equivalent keyboard handler.</li> <li>alt text should not be a meaningless image file name.</li> <li>Document title must not be blank.</li> <li>Figures and images in PDF documents should have non blank ALT text, except for decorative images which should be marked as artifacts.</li> <li>For data tables that have two or more logical levels of row or column headers, use markup to associate data cells and header cells.</li> <li>HTML form control has no accessible name.</li> <li>Link uses non-descriptive text like 'Click Here' with no surrounding text explaining link purpose.</li> <li>Links must have an accessible name.</li> <li>Some table header cells have no corresponding data cells.</li> <li>This skip link is broken. The target anchor does not exist or is commented out.</li> </ul>	<ul style="list-style-type: none"> <li>The CSS outline or border style on this element makes it difficult or impossible to see the link focus outline.</li> <li>Ensure links have discernible text.</li> <li>Ensure all skip links have a focusable target. <ul style="list-style-type: none"> <li>Skip links allow users, especially those relying on keyboard navigation, to bypass repetitive elements (like navigation menus) and jump directly to the main content. This feature greatly improves web accessibility, particularly for users with disabilities.</li> </ul> </li> <li>Ensures tabindex attribute values are not greater than 0. <ul style="list-style-type: none"> <li>The tabindex attribute controls the order in which users navigate through interactive elements (e.g., buttons, links, form fields) using the keyboard. Ensuring correct use of tabindex is crucial for keyboard accessibility. Incorrect values or misuse of tabindex can confuse users and make navigation difficult.</li> </ul> </li> </ul>

## Adams Fire District

The Adams Fire District website is managed by staff from the fire district. The website does not have an accessibility statement nor is there a number for a person to call to contact someone from the town if they experience issues with online bill payments.

Total 148 pages and files scanned through SortSite	
Level A – 12 issues on 58 pages	Level AA – 1 issue on 22 pages
<ul style="list-style-type: none"> <li>alt text should not contain placeholders like 'picture' or 'spacer'.</li> <li>Document title must not be blank.</li> <li>Figures and images in PDF documents should have nonblank ALT text, except for decorative images which should be marked as artifacts.</li> <li>Identify row and column headers in data tables using the elements, and mark layout tables with role=presentation.</li> <li>iframe and frame elements must have a title attribute.</li> <li>img elements must have an accessible name.</li> <li>Indicating links using only a text color change does not work for color-blind users.</li> <li>Link uses non-descriptive text like 'Click Here' with no surrounding text explaining link purpose.</li> <li>Links must have an accessible name.</li> <li>PDFs must be tagged to be accessible by screen readers.</li> <li>This page uses nested tables, which do not make sense when read in a screen reader.</li> <li>Use the lang attribute to identify the language of the page.</li> </ul>	<ul style="list-style-type: none"> <li>Ensure that text and background colors have enough contrast.</li> </ul>

## Adams Housing Authority

Adams Housing Authority website is managed by staff and powered by the Public Housing Authority Network. The website does not have an accessibility statement, however there is contact information to call or email staff with questions.

Total 39 pages and files scanned through SortSite	
Level A – 4 issues on 9 pages	Level AA – 3 issues on 11 pages
<ul style="list-style-type: none"> <li>HTML form control has no accessible name.</li> </ul>	<ul style="list-style-type: none"> <li>Ensure that text and background colors have enough contrast.</li> </ul>

<ul style="list-style-type: none"> <li>• iframe and frame elements must have a title attribute.</li> <li>• Link uses non-descriptive text like 'Click Here' with no surrounding text explaining link purpose.</li> <li>• Some pages have the same title, so the title cannot be used to distinguish pages.</li> </ul>	<ul style="list-style-type: none"> <li>• The CSS outline or border style on this element makes it difficult or impossible to see the link focus outline.</li> <li>• User interface controls must have a contrast ratio of at least 3:1 against adjacent colors.</li> </ul>
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### Recommendations to Achieve Online Accessibility:

- Install accessibility software/widgets on all municipal websites
- Install and utilize accessibility features and guidelines on social media platforms.
  - Review third-party social media terms, conditions and limitations for accessibility compliance when determining whether to use the platform.
- Ensure town staff and departments who are posting on social media or updating webpages take part in annual web accessibility training and are aware of guidelines.
- Dedicate a staff member to evaluate and correct accessibility errors on the town's website and regularly review online assets for compliance.
- Develop procedures to maintain the accessibility of the town's website, including online documents and provide training to staff.
- If the accessibility and maintenance of the town's website is contracted to an outside vendor, contractual language should be included regarding the website accessibility requirements and that the responsibility for the development of and maintenance of an accessible website.
- Before linking to content that was created by a third party, test the content for accessibility, such as videos that start automatically, missing alternative text for photos and available captioning. If the content is not fully accessible, but the entity choosing to link the content regardless, a disclaimer should be added that explains the limitations for the linked content to the user
- Regularly enlist people with a variety of disabilities (Commission on Disability) to test the city or town's online assets for accessibility and ease of use.





Resources to Achieve Online Accessibility	
US Department of Justice - State and Local Governments: First Steps Toward Complying with the Americans with Disabilities Act Title II Web and Mobile Application Accessibility Rule	<a href="https://www.ada.gov/resources/web-rule-first-steps/">https://www.ada.gov/resources/web-rule-first-steps/</a>
The World Wide Web Consortium (W3C) - WCAG 2.1 Level AA Online Accessibility Standards	<a href="https://www.w3.org/TR/WCAG21/">https://www.w3.org/TR/WCAG21/</a>
Massachusetts Office on Disability - Understanding Web Accessibility	<a href="https://www.youtube.com/watch?v=vQyZS2CZN4E&amp;t=3167s">https://www.youtube.com/watch?v=vQyZS2CZN4E&amp;t=3167s</a>
Massachusetts Office on Disability - Accessibility Guidance for State Government Agencies	<a href="https://www.mass.gov/info-details/accessibility-guidance-for-state-government-agencies">https://www.mass.gov/info-details/accessibility-guidance-for-state-government-agencies</a>
Massachusetts Office on Disability - Creating Accessible Digital Documents	<a href="https://www.youtube.com/watch?v=bU8W69okZ70&amp;list=PLsiz0GxiqA2f88B5u9B6uqHDsP3ArEYgK">https://www.youtube.com/watch?v=bU8W69okZ70&amp;list=PLsiz0GxiqA2f88B5u9B6uqHDsP3ArEYgK</a>
Civic Plus - Best Practices for Meeting Accessibility Guidelines	<a href="https://www.civicplus.com/blog/wa/complete-guide-building-ada-compliant-municipal-websites/">https://www.civicplus.com/blog/wa/complete-guide-building-ada-compliant-municipal-websites/</a>
Civic Plus - Municipal Website Redesign	<a href="https://www.civicplus.com/tool-kits/ce/wpt/">https://www.civicplus.com/tool-kits/ce/wpt/</a>
Facebook and Instagram Accessibility	<p>Facebook - <a href="https://www.facebook.com/help/273947702950567?helpref=hc_fnav">https://www.facebook.com/help/273947702950567?helpref=hc_fnav</a></p> <p>Instagram - <a href="https://help.instagram.com/308605337351503">https://help.instagram.com/308605337351503</a></p> <p>Helpful Tips and Tricks for Accessibility on Instagram - <a href="https://about.instagram.com/blog/tips-and-tricks/advancing-accessibility-on-instagram">https://about.instagram.com/blog/tips-and-tricks/advancing-accessibility-on-instagram</a></p>
Accessibility Widgets	<p>UserWay Widget - <a href="https://userway.org/">https://userway.org/</a></p> <p>AudioEye - <a href="https://www.audioeye.com/">https://www.audioeye.com/</a></p>
Civic Plus - Website Accessibility Scan	<a href="https://www.civicplus.com/web-accessibility-software/get-a-scan/">https://www.civicplus.com/web-accessibility-software/get-a-scan/</a>
SortSite - Website Accessibility Scan	<a href="https://www.powermapper.com/products/sortsites/">https://www.powermapper.com/products/sortsites/</a>

# Transition Plan

Location	Barrier	Photo	ADA Standard	MAAB Standard	Solution	Responsibility	Timeframe
Administration	No policies in place to ensure accommodations	N/A	Best Practice	Best Practice	Adopt town-wide accessibility policies	Administration	FY26
Web Content	Not all websites meet WCAG standards		WCAG	N/A	Work with vendor to ensure compliance with WCAG	Administration	FY27
Administration	No support for people with disabilities to shovel sidewalk	N/A	Best Practice	Best Practice	Develop snow shoveling program or policy to assist people with disabilities clean their sidewalks	Administration	FY27

# Transition Plan





Administration	Lack of adaptive technology on hand to assist people	N/A	N/A	N/A	Purchase assistive technologies to help people access services including adaptive hiking equipment for the Greylock Glen	Administration	FY27
Administration	Inactive Commission on Disabilities	N/A	Best Practice	Best Practice	Reactivate Commission on Disabilities	Administration	FY26
Adams Free Library	Curb ramp deteriorating		406	21	Repair curb ramp to ensure compliance	DPW	With next paving
Adams Free Library	Toilet paper dispenser located too far from edge of toilet		604.7	N/A	Move toilet paper dispenser	Building Department	FY26




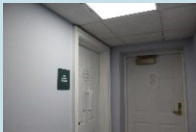
Adams Free Library	Door is too heavy		404.2.9	26.8.1 (b)	Adjust door closer	Building Department	FY26
Adams Free Library	Coat hook exceeds standards		603.4	N/A	Install new coat hook	Building Department	FY26
Adams Memorial Middle School	Excessive slopes from parking lot to front entrance		403.3	20.9	Redesign parking	Town Administration and/or private developer	With redevelopment
Adams Memorial Middle School	Threshold into gymnasium exceeds ¼"		404.2.5	26.10.1	Install new threshold	Private developer	With redevelopment



Adams Memorial Middle School	Thresholds in hallway to bathroom		404.2.5	26.10.1	Install new thresholds	Private developer	With redevelopment
Adams Station	Incorrect signage on bathroom		703	41	Install new signage	Building Department	FY27
Adams Station	Exposed drainage and supply pipes under bathroom sinks		606.5	30.9.5	Insulate pipes	Building Department	FY27
Northern Berkshire Registry of Deeds	Wheelchair lift out of order		206.2.2	20.2.1	Fix lift	Town Administration /Contractor	FY26

Northern Berkshire Registry of Deeds	Counters are too high		904.3.2	7.2.1 (c)	Install new counter	Town Administration /Contractor	FY28
Northern Berkshire Registry of Deeds	No audible and visual fire alarms		702.1	40.3	Design and install new fire alarm system	Town Administration /Contractor	FY28
Northern Berkshire Registry of Deeds	Door knobs present throughout the building		309.4	26.11.1	Install new door hardware	Building Department	FY28
Police Department	No van accessible parking		502.6	23.6.3	Add van accessible parking sign	Building Department	FY27





Police Department	Parking lot slopes noncompliant		403.3	20.9	Repair sidewalk	Highway Department	FY27
Police Department	Trash can protrudes into clear floor space		304.3.1	30.7.2	Install wall-mounted trash receptacle	Building Department	FY27
Town Hall	Front entrance not accessible		Multiple	Multiple	Engineer new front entrance, consider adding ramp and parking out front	Town Administration	FY26 (dependent on town support)
Town Hall	Front entrance not accessible		Multiple	Multiple	Contract for front entrance repairs	Town Administration /Building Department	FY27 (dependent on funding and town support)



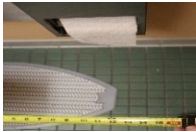

Town Hall	Accessible route from accessible parking sloped inappropriately		403.3	20.9	Engineer new route to accessible entrance or connection to new front entrance	Town Administration	FY26 (dependent on town support)
Town Hall	Accessible route from accessible parking sloped inappropriately		403.3	20.9	Contract for rebuilding of accessible route to either current or new entrance	Town Administration	FY27 (dependent on funding and town support)
Town Hall	Not all signs are tactile/braille and heights are inconsistent		216.2 703.4.1	41.1.1 41.2.2	Install new signs	Building Department	Beyond FY30
Town Hall	No knurled warning on doors to hazardous areas		N/A	26.11.4	Install new handle	Building Department	Beyond FY30

Town Hall	Sunroom not accessible		303.2	29.2.1	Install ramp into sunroom	Building Department	With change of use of room to any public service or meetings
Town Hall	Insufficient clear floor space next to town administrator's office		703.4.2	26.6.3 (a)	Move table obstructing sign	Building Department	FY26
Town Hall	Men's room door requires too much pressure to open		404.2.9	26.8.1 (b)	Adjust closer	Building Department	FY26
Town Hall	Coat hook is too high off the ground		603.4	N/A	Install new coat hook at 48"	Building Department	FY26



Town Hall	Trash can limits maneuverability of bathroom		30.7.2	304.3.1	Install wall-mounted trash receptacle	Building Department	FY27
Town Hall	Radiator in women's room intrudes into clear floor space		309.4	26.11.1	Install flat panel heating unit	Town Administrator/ Contractor	Beyond FY30
Town Hall	No signage at inaccessible restroom directing people to accessible restroom		216.8	N/A	Install sign at inaccessible bathroom	Building Department	FY27
Visitor's Center	Curb ramp exceeds slope limits		405.2	21.3	Repair curb ramp	Town Administrator/ Contractor	With next repaving


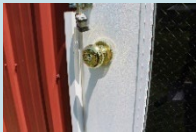
Visitor's Center	Coat hooks in event space are beyond reach ranges		308.2	6.5	Install another coat hook at 48" from the ground	Building Department	FY26
Visitor's Center	Chair blocks sign for stairwell		703.4.2	26.6.4	Move chair	Council on Aging	FY26
Visitor's Center	No tactile sign for program room		216.2	41.1.1	Install new signage	Building Department	FY27
Visitor's Center	Northern Berkshire Waste Management District sign is obscured by mailbox		703.4.2	26.6.3 (a)	Move mailbox	Building Department	FY26





Visitor's Center	Bathroom signs are not tactile/Braille		703	41	Install new signage	Building Department	FY27
Visitor's Center	Bathroom door requires too much pressure to open		404.2.9	26.8.1 (b)	Adjust door closer	Building Department	FY26
Visitor's Center	Toilet paper dispenser is too far from the toilet seat		604.7	N/A	Move toilet paper dispenser	Building Department	FY26
Visitor's Center	Phone is outside of reach ranges		308.2	6.5	Mount phone lower	Building Department	FY26

Albert Reid Park	No accessible parking		208.2	23.2.1	Install accessible parking space	Highway Department	With repaving
Albert Reid Park	No accessible route to playground on eastern side of park		206.2.2	19.7	Install accessible route to playground	Parks Department	Beyond FY30
Cook Street Dog Park	No van accessible space/sign too low		502.6 208.2.4	23.6 23.2.2	Install van accessible sign at appropriate height	Parks Department	FY27
George Bowe Field	Parking is not on a firm surface		502.4	23.4.4	Pave one van accessible space	Parks Department	FY29




George Bowe Field	No parking delineation		N/A	23.4.5	Delineate parking on new pavement	Parks Department	FY29
George Bowe Field	Parking sign is too low		502.6	23.6.4	Install new sign	Parks Department	FY29
George Bowe Field	No accessible route from parking to event entrance		206.2.1	20.2.1	Pave pathway from new parking space to entrance	Parks Department	FY29
George Bowe Field	No accessible route to any of the buildings		206.2.2	20.2	Pave an accessible route to each of the buildings	Parks Department	FY29



George Bowe Field	Barrier to enter gazebo		303.2	20.10	Restore previous asphalt route or redesign and install new route connecting entrance and other buildings	Parks Department	FY29
George Bowe Field	Ramp only has railings on one side		505.2	24.5.1	Install handrail on other side of ramp	Parks Department	FY29
George Bowe Field	Change in level at all other outbuildings		303.2	20.10	Ensure paved pathway also provides level access to enter buildings	Parks Department	FY29
George Bowe Field	All buildings have door hardware that requires twisting of the wrist or grasping		309.4	26.11.1	Install lever sets on all doors	Parks Department	FY29

George Bowe Field	Playground is in accessible		206.2.2 1008.2.6 .2 240.2.1. 2	19.7	Install accessible path, adding ground-level elements to playground, and install accessible surface	Parks Department	Beyond FY30
George Bowe Field	Excessive cross slope on concrete walkway		403.3	20.9	Renovate route to the building	Parks Department	FY29
George Bowe Field	Improper restroom signage		703	41	Install appropriate signs at the restrooms	Parks Department	FY29
George Bowe Field	Change in level to enter restrooms		303.2	20.10	Renovate route into the building	Parks Department	FY29





George Bowe Field	Restroom door hardware requires twisting of the wrist or grasping		309.4	26.11.1	Install level set on restroom doors	Parks Department	FY29
George Bowe Field	Sinks have exposed supply and drainage pipes		606.5	30.9.5	Insulate pipes under sink	Parks Department	FY29
George Bowe Field	Paper towel dispensers in restrooms are too high off the ground		308.2.1	6.5	Lower dispenser to appropriate height	Parks Department	FY29
George Bowe Field	Non-compliant clear floor space in large restroom stalls		604.2	30.7.2	Redesign the layout of the stall to ensure appropriate space	Parks Department	FY29





George Bowe Field	No grab bars in restrooms		604.5	30.8	Install grab bars	Parks Department	FY29
George Bowe Field	Toilet paper dispensers in restrooms are incorrectly located		604.7	30.7.6	Move toilet paper dispensers to appropriate location	Parks Department	FY29
George Bowe Field	Coat hook heights do not meet most recent standards in restrooms		308.2.1	6.5	Lower coat hooks	Parks Department	FY29
George Bowe Field	Flush control in women's stall is located on the incorrect side		604.6	30.7.5	Change tank	Parks Department	FY29




George Bowe Field	Mirrors in women's room are too high		603.3	30.11	Relocate mirrors	Parks Department	FY29
Liberty Street Field	No accessible parking sign		502.6	23.6	Install van accessible parking sign	Parks Department	FY27
Liberty Street Field	Gate blocks access to accessible route to playground		206.2.2	20.2.1	Create pedestrian access around gate	Parks Department	FY29
Liberty Street Field	Accessible route damaged		206.2.2	20.2.1	Repair pedestrian route	Parks Department	FY29



Liberty Street Field	No accessible route to benches and trash cans		206.2.2	20.2.1	Move benches and trash cans to accessible route	Parks Department	FY29
Memorial Park	No accessible parking		208.2	23.2.1	Install accessible parking space	Highway Department	Beyond FY30
Quality Street Field	No accessible route into the park		206.2.1	20.2.1	Install parking and accessible route into the park	Highway Department	Beyond FY30
Renfrew Park	Parking signs are too low		502.6	23.6.4	Raise parking signs	Highway Department	FY26

Russell Field	Parking space missing sign		502.6	23.6.1	Install new parking sign	Highway Department	FY26
Russell Field	Parking not at the shortest accessible route to playground		N/A	23.3.1	Install accessible parking at the accessible route and remove barrier to route	Highway Department	FY26
Siara Field	No accessibility		Multiple	Multiple	Ensure any future development includes accessibility	Town Administration	As needed
Valley Street Field	Unclear where accessible parking is from the street		N/A	N/A	Install sign indicating where parking is located	Highway Department	FY26

Valley Street Field	Picnic table is not on an accessible route		206.2.2	20.2.1	Move table to accessible route/pave underneath the surface	Parks Department	FY28
Visitor's Center Park	Curb ramp on Hoosac Street side has excessive slope		405.2	21.3	Repair curb ramp	Highway Department	Beyond FY30
Visitor's Center Park	Benches and fire pit are not on accessible path		206.2.2	20.2.1	Install accessible route to the elements	Highway Department	Beyond FY30
Visitor's Center Park	Insufficient number of accessible tables		N/A	19.5.2	Purchase and install accessible table	Parks Department	Beyond FY30

Visitor's Center Park	Path to rail trail exceeds 5%		403.3	20.9	Install handrails along the walkway	Parks Department	Beyond FY30
Visitor's Center Park	Portable toilets are not wheelchair accessible, do not have ramp into it, and are not located on accessible route		Multiple	Multiple	Rent wheelchair accessible toilet for when Visitor's Center is closed and/or install signage directing people to the accessible restrooms in the visitor's Center	Parks Department/ Town Administration	FY26
Winter Street Park	No accessibility		N/A	N/A	Ensure any development of the parcel is accessible	Town Administration	When needed

# Resources

Organizations		
Organization Name	Phone & Fax	Address
Adaptive Environments <a href="http://www.adaptenv.org/">http://www.adaptenv.org/</a>	Phone / TTY: (800) 949-4232	374 Congress Street, Suite 310, Boston, MA 02210
American National Standards Institute <a href="https://www.ansi.org/">https://www.ansi.org/</a>	Phone: (202) 293-8020 Fax: (202) 293-9287	1819 L Street, NW, Washington, DC 20036
The Access Board Federal standards <a href="https://www.access-board.gov/ada/">https://www.access-board.gov/ada/</a>	Phone: (202) 272-5434 TTY: (202) 272-5449 Fax: (202) 272-5447	1331 F Street, NW, Suite 1000, Washington, DC 20004-1111
Massachusetts Architectural Access Board State standards <a href="https://www.mass.gov/aab-rules-and-regulations">https://www.mass.gov/aab-rules-and-regulations</a>	Phone / TTY: (617) 727-0660 Fax: (617) 727-0665	One Ashburton Place, Room 1310, Boston, MA 02108
Massachusetts Office on Disability <a href="https://www.mass.gov/orgs/massachusetts-office-on-disability">https://www.mass.gov/orgs/massachusetts-office-on-disability</a>	Phone / TTY: (617) 727-7440 or (800) 322-2020	One Ashburton Place, Room 1305, Boston, MA 02108
National Center on Accessibility <a href="https://ncaonline.org/">https://ncaonline.org/</a>	Phone: 856-4422 TTY: (812) 856-4421 Fax: (812) 856-4480	Indiana University 2805 East 10th St, Suite 190, Bloomington, IN
U.S. Architectural and Transportation Barriers Compliance Board ("The Access Board") <a href="https://www.access-board.gov/">https://www.access-board.gov/</a>	Phone: (800) 872-2253 TTY: (800) 993-2822 Fax: (202) 272-5447	1331 F Street, NW, Suite 1000, Washington, DC 20004-1111



## 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, 101<sup>st</sup> 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

Funding Source	Description
Community Development Block Grant: Architectural Barrier Removal - Massachusetts Department of Housing and Community Development <a href="https://www.mass.gov/files/documents/2017/12/04/Architectural%20Barrier%20Removal.pdf">https://www.mass.gov/files/documents/2017/12/04/Architectural%20Barrier%20Removal.pdf</a>	Community Development Block Grant (CDBG) funding is one of the few non-local public resources available to help pay for Architectural Barrier Removal (ABR) in public and private buildings. This document explains accessibility regulations, examples of projects eligible for CDBG assistance, the relevant national objective, and considerations that will make a Massachusetts CDBG Program ABR application competitive.
Community Facilities Direct Loan & Grant Program - United States Department of Agriculture <a href="https://www.rd.usda.gov/programs-services/community-facilities">https://www.rd.usda.gov/programs-services/community-facilities</a>	This program provides affordable funding to develop essential community facilities in rural areas. An essential community facility is defined as a facility that provides an essential service to the local community for the orderly development of the community in a primarily rural area, and does not include private, commercial or business undertakings.
Complete Streets - MassDOT <a href="https://www.mass.gov/complete-streets-funding-program">https://www.mass.gov/complete-streets-funding-program</a>	The MassDOT Complete Streets Funding Program addresses critical gaps in transportation networks by giving Massachusetts municipalities tools and funding to advance Complete Streets in their community. Complete Streets are ones that provide safe and accessible options for all travel modes - walking, biking, transit and vehicles - for people of all ages and abilities. The program provides technical assistance and construction funding to eligible municipalities. To be eligible, municipalities must pass a Complete Streets Policy and develop a Prioritization Plan.
MassAbility - Executive Office of Health and Human Services <a href="https://www.mass.gov/orgs/massability">https://www.mass.gov/orgs/massability</a>	MassAbility empowers people with disabilities to live life on their own terms. Our programs and services expand possibilities in careers and training, home and community life, and legal rights and benefits - including disability determination for federal programs.
Municipal ADA Improvement Grant - Massachusetts Office on Disability <a href="https://www.mass.gov/info-details/municipal-ada-improvement-grant-program">https://www.mass.gov/info-details/municipal-ada-improvement-grant-program</a>	The Municipal ADA Improvement Grant provides funding to Massachusetts cities and towns to improve accessibility for people with disabilities. Funding supports updating a municipality's ADA Self Evaluation and Transition plans and making capital improvements that improve access or remove barriers in municipal programs, services, and facilities.

<p>Municipal Americans with Disabilities Act Grant – Massachusetts Councils on Aging</p> <p><a href="https://mcoaonline.org/municipal-americans-with-disabilities-act-grant">https://mcoaonline.org/municipal-americans-with-disabilities-act-grant</a></p>	<p>These grants will support capital improvements specifically dedicated to improving physical and programmatic access and/or removing barriers encountered by persons with disabilities in applicant facilities throughout the Commonwealth. Grants will be awarded to successful applicants to remove barriers and create and improve accessible features and programmatic access for persons with disabilities throughout the Commonwealth.</p>
<p>Unpaved Trails for All – The Massachusetts Office of Outdoor Recreation: Trails for All initiative</p> <p><a href="https://www.mass.gov/info-details/trails-for-all#resources">https://www.mass.gov/info-details/trails-for-all#resources</a></p>	<p>The Trails for All initiative aims to create universally accessible trails, through intentional trail planning that removes barriers to access and brings the outdoors to individuals of all abilities via trail improvements such as gentle grades, stable surfaces, and inclusive signage in Massachusetts.</p> <p>Nature has proven health benefits for stress relief, chronic illness and stress-related illnesses, and unpaved trails provide greater health benefits when compared to paved trails.</p>
<p>Quality of Life Grants Program – Christopher and Dana Reeve Foundation</p> <p><a href="https://www.christopherreeve.org/todays-care/get-support/grants-for-non-profits/">https://www.christopherreeve.org/todays-care/get-support/grants-for-non-profits/</a></p>	<p>The Quality of Life Grants Program, created by the late Dana Reeve, strives to empower individuals with disabilities and their families by providing grants to nonprofit organizations that improve quality of life through inclusion, access, independence, opportunities for community engagement, and other life-enhancing endeavors.</p>