

# TOWN OF WILLIAMSTOWN, MA

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## ADA SELF-ASSESSMENT & TRANSITION PLAN



**Submitted by:**  
Kessler McGuinness & Associates, LLC  
Josh Safdie, AIA, NCARB  
Principal

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## INTRODUCTION

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The Town of Williamstown (the Town) was incorporated in 1765. Williamstown, part of Berkshire County, is in Western Massachusetts, and shares a border with both Vermont and New York. It is primarily a college town, with Williams College being located there. The town is approximately 46 square miles and has a population of approximately 7,754.

Like all municipalities, the Town has a regulatory obligation to ensure that it does not discriminate against individuals with disabilities in the provision of municipal programs and services. The ADA defines individuals with disabilities as those who fall into one of the following three categories:

1. Individuals who have a physical or mental impairment that substantially limits one or more major life activities,
2. Individuals with a record of such an impairment; or
3. Individuals regarded as having such an impairment

The Americans with Disabilities Act (ADA) does not necessarily require that all of the Town's facilities are fully accessible. Rather it requires that all of the Town's programs and services, "when viewed in their entirety," are accessible. The law provides public entities with some flexibility in how this standard can be met. Both structural and nonstructural methods of providing "program access" can be used.

In order to ensure such accessibility, the ADA requires a public entity to take five administrative actions:

1. Designate an employee responsible for carrying out compliance activities.
2. Provide notice to the public of its rights and protections under the ADA and how the entity complies with those obligations.
3. Establish a grievance procedure.
4. Conduct a Self-Evaluation, a comprehensive review of policies and procedures.
5. Develop an *ADA Transition Plan*.

The only limit to the Town's obligations is if an action will result in a fundamental alteration to the program or service or create undue administrative or financial burdens. The decision that compliance would result in such alteration or burdens must be made by the head of the public entity or his or her designee and must be accompanied by a written statement of the reasons for reaching that conclusion. If it is determined that barrier removal will result in such an alteration or burdens, the Town must still "take any other action that would not result in such an alteration or such burdens but would nevertheless ensure that individuals with disabilities receive the benefits or services provided by the public entity."

## REGULATORY CONTEXT

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There are four federal and state requirements for architectural barrier removal in existing buildings and in alterations to existing buildings. These are:

1. **PL101-336: 1990 Americans with Disabilities Act (ADA).** This is the federal civil rights statute whose first purpose is: *...To provide a clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities.* (42 USC 12101. Sec.2(b))
2. **28 CFR Part 35: Department of Justice: Nondiscrimination on the Basis of Disability in State and Local Government Services (as amended by the final rule published on September 15, 2010).** These are the U.S. Department of Justice's regulations implementing the ADA, as required in 42 USC 12101, Sec.204(a)
3. **29 USC 794: Section 504 of the 1973 Rehabilitation Act (504)**
4. **521 CMR: The Rules and Regulations of the Massachusetts Architectural Access Board.** (1977, 1987, 1990, 1992, 1996, 1998, 2006) These regulations are *designed to make public buildings and facilities accessible to, functional for, and safe for use by persons with disabilities.* (521 CMR 2.1). These are incorporated by reference as a special code in the Massachusetts State Building Code.

### ADA AND 504 BARRIER REMOVAL REQUIREMENTS

There are two requirements under Title II of the ADA that require a public entity such as the Town to remove existing barriers to bring an end to, and to prevent, discrimination against a person or people with disabilities. These two requirements are:

- Program access, and
- Alterations to existing facilities.

### PROGRAM ACCESS

The ADA's Section 202. Discrimination states:

*... no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity.*

The ADA's Section 204 required that the U.S. Department of Justice (DoJ) promulgate implementing regulations by 26 July 1991, one year after enactment of the legislation. These regulations are 28 CFR 28, published on July 26, 1991. 28 CFR 35.149 states:

*... no otherwise qualified individual with a disability shall, because a public entity's facilities are inaccessible to or unusable by individuals with disabilities, be excluded from participation in, or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity.* 28 CFR 35.150 states that: *A public entity shall operate each service, program, or activity so that the service,*

*program, or activity, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities.*

This statutory and regulatory language above describes what is known as “program access” – a situation where all programs are readily accessible to, and usable by, qualified persons with disabilities. In addition, qualified students with disabilities must be provided with equal services in as integrated a setting as possible. The determination of what is an equal and integrated setting will be made on a case-by-case basis. What is appropriate for one person with a specific impairment may not be useful or appropriate for another person with the same impairment. Failure to provide “program access” is an illegal act of discrimination under Title II of the ADA. The Town must identify and correct policies and practices that have the effect of discriminating against individuals with disabilities.

## **METHODS OF PROVIDING PROGRAM ACCESS**

28 CFR 35.150 details the methods that a public entity such as the Towns may use to provide program access. These include:

- Reassignment of services to accessible buildings;
- Delivery of services at alternate accessible sites;
- Alteration of existing facilities and construction of new facilities; or
- Any other methods that result in making its services, programs, or activities readily accessible to and usable by individuals with disabilities.

From an architectural standpoint, this requirement does not mean that every building has to be accessible. However, every program must be accessible.

## **TRANSITION PLAN**

Where the Town’s Self Evaluation determines that structural changes are required to provide program access, the ADA requires that a Transition Plan be developed that establishes the planned barrier removal. The plan is required to:

- Identify physical obstacles in the public entity’s facilities that limit the accessibility of its programs or activities to individuals with disabilities;
- Describe in detail the methods that will be used to make the facilities accessible;
- Specify the schedule for taking the steps necessary to achieve compliance with this section and, if the time period of the transition plan is longer than one year, identify steps that will be taken during each year of the transition period; and
- Indicate the official responsible for implementation of the plan.

A copy of the transition plan is required to be made available for public inspection. If the Town receives federal funds, they were required in 1980 to develop a similar transition plan to achieve program accessibility under Section 504 of the Rehabilitation Act. Under Section 504,

structural or architectural barriers to program access identified in the 504 Transition Plan were to be removed by 1983.

The ADA Transition Plan requirement was intended as an update of the 504 plan to cover any new programs and services not covered and made accessible under the 504 barrier removal program. The ADA requires public entities either to supplement their 504 Transition Plans or replace them with ADA Transition Plans. The Town should have developed an ADA Transition Plan by July 1992.

## **SCHEDULE FOR PROGRAM ACCESS COMPLIANCE**

28 CFR 35.150 sets a time period for ADA compliance stating:

*Where structural changes in facilities are undertaken to comply with the obligations established under this section, such changes shall be made within three years of January 26, 1992, but in any event as expeditiously as possible.*

Both 504 and Title II of the ADA presume that people with disabilities will be using the programs and services of public entities. In anticipation, they both mandate proactive steps to prevent discrimination by removing existing barriers. They do not permit public entities to wait until a person with a disability arrives before beginning to make accommodations. Minor accommodations may be needed, but the significant assessment and barrier removal should be complete.

## **SELF-EVALUATION**

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The Town retained the services of Kessler McGuinness & Associates, LLC (KMA) to perform an assessment of Leverett's programs, services, and facilities. To develop Williamstown's ADA Self-Evaluation and Transition Plan, to date, KMA has performed the following tasks:

1. A conference call was held with the Town Administrators to discuss project goals and methodology.
2. Two questionnaires were distributed; one addressing the central policies and procedures of the Town and a second questionnaire for each department/program. Three (3) departments completed and returned the questionnaires. Policies and procedures was not provided and therefore could not be assessed.
3. A review of the completed questionnaires and other policy documents received from the Town including was undertaken, including:
  - a. Limited information about the mono mouse, a handheld electronic magnifier. The mono mouse device can assist someone with visual impairments to be able to read print on screens more clearly.

- b. Limited information about a two (2) touch pads was provided. These devices can be used in place of a mouse when an individual has limited use of their hands.
- 4. Access audits of town buildings and facilities were performed, and Draft ADA Existing Conditions Reports were completed.
- 5. A Draft ADA Self-Evaluation was developed and presented for public review.
- 6. A Draft Barrier Removal Priorities were developed and presented for public review. There were comments from the public.

**PROGRAMS, SERVICES, AND ACTIVITIES**

According to the town’s website, Williamstown provides municipal programs and services through the following departments, boards, and committees:

**Elected Officials**

Select Board	Library Trustees at the Milne Public Library
Housing Authority	Planning Board
Mt. Greylock Transition Committee	Elementary School

**Appointed by the Moderator**

Finance Committee

**Appointed by the Select Board**

Affordable Housing Committee	Mobil Home Rent Control Board
Affordable Housing Trust	Municipal Scholarship Committee
Agricultural Commission	Registrars of Voters
Community Preservation Committee	Sign Commission
Constables	Spruces Land Use Committee
Cultural Council of northern Berkshires	Berkshire Regional Transit Authority
Fence Viewers	Zoning Board of Appeals
Hoosac Water Quality Distribution	

**Appointed by the Town Manager**

1753 House Committee	Forest Warden
Board of Assessors	Tree Warden
Berkshire Regional Planning Committee	Health Inspector
Council on Aging	Board of Health
Conservation Commission	Historic Commission
Energy Management	



Two questionnaires were distributed; one addressing the Town’s central policies/procedures and a second to be completed for each Town program [see Appendix].

## **OVERVIEW OF DEPARTMENTAL FINDINGS – POLICIES AND PROCEDURES**

The following departmental summaries are based on responses to the above-referenced questionnaires. A summary of these findings, along with recommendations regarding changes to existing policies and procedures and/or implementation of new ones, may be found later in this document.

### **Town Clerk (Administration)**

The town clerk oversees licenses, certificates, etc. and assists with elections and local and state meetings. According to the Department’s self-assessment questionnaire, there are no procedures in place for providing reasonable accommodations upon request. Printed materials are not available in any alternate formats. There is no supporting evidence that employee requests for reasonable accommodations can be provided since none of the employee policy and procedures was provided. The questionnaire states the entrances and exits are fully accessible. KMA’s assessment of the building shows that neither the front nor the rear entrance ramp is fully accessible. However, once inside the building, the offices and toilet facilities are on an accessible route.

### **Board of Assessors**

The Board deals with the various responsibilities of properties, property values, etc. Limited information was provided by the self-assessment questionnaire, except to note that print materials are available in alternate formats, but specific examples were not elaborated.

### **Library**

The Milne Public Library is open 6 days a week. In addition to the typical library services such as lending reading materials and having special events, there are three (3) community rooms that can be reserved for events. In addition, there is a children’s zone and a teen zone. According to the Department’s self-assessment questionnaire, reasonable accommodations are requested through the Director. According to the questionnaire, when an individual with no hands requested accommodations to use the computers, two (2) touchpads were installed. A mono mouse, which enlarges the print on screens to assist individuals with vision impairments, is also available. In addition, special headphones for the computers are available but no additional information about how they are utilized was provided. Printed materials are not available in alternate formats.

### **Williamstown Website**

A statement of the town's compliance with the ADA is not provided, nor is there any information regarding disability related issues. There is no information that an assistive listening device is available at the Town Hall and Library. There is no information about the accessibility of different facilities. Information regarding disability related issues is not easy to find. None of the departments offers TTY availability. The website does not list TTY phone nor is there any offer of TTY availability. Announcements of upcoming events do not include information regarding accessibility of the event/location. Nor do they do not provide the opportunity for requesting accommodations. There is a link to the Council on Aging that includes a calendar of events and a newsletter that lists resources and announcements. The Milne Public Library (separate) website does state "the present site is compliant with the Americans with Disability Act".

### **MUNICIPAL FACILITIES**

As part of the self-evaluation process, KMA staff completed field audits of the following public buildings and facilities on May 24 - 25, 2018:

- Senior Center
- Town Hall
- Transfer Station

In addition, the following conservation areas, trailheads, and recreation spaces were audited:

- Broad Brook Park
- Linear Parks
- Lowry Property
- Margaret Lindley Park
- The Spruces

The purpose of these audits was to identify typical and/or significant unique elements that may represent a barrier to program access. These were not comprehensive audits, and the reports of the findings are not intended to address any current or future renovation plans for the facility, or operational or functional aspects of the building beyond ADA compliance. The construction, renovation, and maintenance of these facilities is also subject to the state building code, as well as local codes, regulations, and ordinances (if any).

The reports may be found in Appendix B to this report. Cost estimates are provided in the reports for budget planning purposes only and do not represent actual construction costs. The audits did not account for structural and other factors that may have a significant impact on the cost of mitigation(s). It is assumed that further analysis will be performed to determine actual construction costs that address specific conditions and the local market. The cost estimates are time sensitive and may increase over time.

## KEY FINDINGS AND RECOMMENDATIONS

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Based on the information on the Town's website, completed forms, and discussions with staff, KMA finds that the Town has made limited progress in meeting its ADA obligations not to discriminate based on disability. Following are specific findings and recommendations.

### POLICIES AND PROCEDURES

**Finding 1:** It does not appear the Town has fulfilled several Title II administrative requirements. There were no policies and procedures provided and therefore KMA could not assess if specific information about ADA accommodations are provided.

**Recommendation 1:** Develop and disseminate:

- a. Policies and procedures handbook and ensure information for requesting reasonable accommodations is included across all relevant forms.
- b. Various policies such as an ADA Grievance Policy, which should include information for accessing the Town ADA Coordinator.
- c. Procedures to ensure meetings, hearings, etc. are held in barrier-free locations and include (if requested) interpreters for the deaf and taped/audio material for the blind.
- d. A formal policy regarding service animals in municipal facilities and schools.
- e. A public notice of ADA compliance.
- f. Clear information that there is a process for both requesting and of responding to requests for modifications to policies or procedures on the basis of disability.

**Finding 2:** Responses to the department self-assessment questionnaires indicate that most personnel do not have a clear understanding regarding the extent of the Town's program access obligations. For example, although some departments stated they do provide reasonable accommodations for employees, none elaborated on the actual procedure for accommodating any requests. There was no mention of any staff training in this area. There is no identified ADA Coordinator.

**Recommendation 2:** Identify an ADA Coordinator. Develop and provide ADA training for the ADA Coordinator and all Town departments and ensure that new hires and volunteers are made aware of their role in meeting the Town's responsibilities on an ongoing basis.

**Finding 3:** The Town does not appear to have a coordinated plan to ensure equal access to safe egress or evacuation from municipal facilities.

**Recommendation 3:** KMA recommends that an Emergency plan be developed and reviewed to ensure it provides equal access to safe egress for any visitor or member of the

community, including additional assistance if required, to effectively alert, evacuate, and/or shelter them during an emergency. To ensure equal access to safe egress for individuals with disabilities, develop protocols and signage for such issues as:

- Fire Exits signage and maneuvering space.
- Safe Wait Areas.
- Evacuation Maps.
- Information should be developed and disseminated regarding the locations of fire exits and *Safe Wait Areas* serving each municipal space.
- Public and Employee Orientation to the Academy's Emergency Evacuation Procedures.

**Finding 4:** There is no information on the Town's website regarding access to programs and services for people with disabilities.

**Recommendation 4:** Include basic accessibility-related information on the website, including but not limited to contact information for the Town ADA Coordinator, a public notice of ADA compliance, and information regarding auxiliary aids and services for all Town-sponsored programs, services, and activities.

**Finding 5:** Responses to the department self-assessment questionnaire indicate that some personnel who interact with the public are not familiar with methods for effective communication with people with disabilities. For example, most departments do not have print materials in alternate formats, auxiliary aids and services, or procedures for responding to requests for these methods.

**Recommendation 5:** Provide training in effective communications with people who have disabilities.

**Finding 6:** Responses to the questionnaires indicate the need to establish the capacity across all Town departments to provide auxiliary aids and services and then to disseminate information about their availability. The existing capacity specifically within the library can be built upon.

**Recommendation 6:** Institute a process to assess the communication needs of the community for auxiliary aids and services. Based on the assessment, establish the appropriate vendors and contractual agreements so that aids and services can be provided in a timely manner, for example:

- ASL interpreters
- Taped texts, audio recordings, Braille materials, large print materials.

Disseminate information about the availability of the aids.

**Finding 7:** The availability print materials in alternate formats is limited (except as noted by the Board of Assessors).

**Recommendation 7:** Develop the capacity to provide alternate formats upon request, in a timely manner, for all Town departments that provided print materials. Appropriate responses to requests for alternative forms of communication should be included in the general ADA training.

## MUNICIPAL FACILITIES

**Finding 8:** Most of the Town’s buildings open to the public are generally accessible - there is an accessible entrance, access to most programs/offices, adjacent accessible parking and if there are public toilets rooms they are substantially accessible. However, KMA has identified a number of non-compliant elements in each of the audited facilities.

**Recommendation 8:** KMA recommends establishing a long-term capital improvement plan to undertake architectural barrier removal at municipal facilities in a prioritized sequence. Refer to the Proposed Capital Improvement Plan, below. KMA also recommends establishing accessible design management protocols to ensure full compliance in all new construction and alterations.

**Finding 9:** Some elements of the Town’s buildings have been constructed to be accessible but have not been maintained as accessible elements.

**Recommendation 9:** Develop a program and train staff in maintenance/housekeeping protocols to improve maintenance of accessible elements.

## Recommended Long-Term Capital Improvement Plan

The following architectural barrier removal priorities have been identified in order to better serve the public:

### I. Town Hall

1. Provide accessible parking spaces for the building.
2. Provide a compliant ramp at the front entry and modify the bottom edge of the rear entry ramp to provide a smooth transition.
3. Remove signs that reduce the required headroom and provide compliant room signage mounted on the latch side of the door.
4. Modify the unisex toilet room to be fully accessible and provide directional signage from the multi-user toilet rooms to the accessible unisex toilet room.
5. Provide an accessible table in the Board of Selectman room.
6. Provide compliant door hardware at the Veterans’ Office, unisex toilet room and at significant locations within the building.

7. Modify the transaction counters at the Community Development and Treasurers Office.
8. Undertake other minor barrier removal activities, as outlined in the audit report.

## **II. Senior Center**

1. Modify accessible parking spaces to be fully compliant and provide a compliant curb ramp at the head of the access aisle.
2. Provide compliant room signage mounted on the latch side of the door.
3. Modify both the Men's and Women's room to be fully compliant.
4. Provide at least one (1) accessible table in each space.

## **III. Transfer Station**

1. Provide access to the office or reasonable accommodations for obtaining stickers and trash removal.

## **IV. Open Spaces**

1. Broad Brook Park:
  - i. Provide a van accessible parking space.
  - ii. Develop a feasibility study to determine if an accessible route to primary function areas can be provided.
2. Linear Parks:
  - i. Provide van accessible signage.
  - ii. Provide an accessible route to the tennis courts,
3. Margaret Lindley Park:
  - i. Provide van accessible signage.
  - ii. Develop a feasibility study to determine if an accessible primary function areas can be provided.
4. The Spruces:
  - i. Provide van accessible signage.
  - ii. Provide waste and dog waste receptacle adjacent to the parking area.

## Resources

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There are a number of resources available to assist the Town with the implementation of their Transition Plan and to ensure it meets its obligations to its residents.

### Grant Funding

#### **Massachusetts Community Development Block Grant Program (CDBG)**

CDBG is a federally funded, competitive grant program designed to help small cities and towns meet a broad range of community development needs. Eligible projects include but are not limited to housing rehabilitation or development, micro-enterprise or other business assistance, infrastructure, community/public facilities, public social services, planning, removal of architectural barriers to allow access by persons with disabilities, and downtown or area revitalization. More information about the program can be found here:

<https://www.mass.gov/service-details/community-development-block-grant-cdbg>

#### **Massachusetts Municipal ADA Improvement Grant Program**

The Massachusetts Office on Disability (MOD) administers the Municipal ADA Improvement Grant program. This funding is aimed at supporting capital improvements to improve programmatic access and/or removing barriers encountered by people with disabilities. Project grants of up to \$250,000 are available. There are also planning grants to assist communities in creating or updating a Self-Evaluation and/or Transition Plan. More information about the program can be found here:

<https://www.mass.gov/municipal-americans-with-disabilities-act-grant>

#### **Massachusetts Cultural Facilities Fund**

The Massachusetts Cultural Council and MassDevelopment provides cultural organizations, including Municipalities that own cultural facilities that are at least 50,000 square feet, with grant funding to support three project types: Feasibility and Technical Assistance grants; Systems Replacement Plan Grants; and Capital grants. Feasibility and Technical Assistance grants of up to \$50,000 are available for costs and expenses related to overall planning and feasibility for a project. Systems replacement plan grants of up to \$7,000 are available to support the development of a capital needs assessment of a building and its mechanical system. Capital grants ranging from \$250,000-\$675,000 are available for acquisition, design, construction, repair, renovation, rehabilitation or other capital improvements. In order for a municipality to be eligible to apply for this funding, it must demonstrate that 50% or more of

the facility is used for arts, humanities, or interpretative science programming. All grant programs require a 1-1 match. More information about the program can be found here:

<http://www.massculturalcouncil.org/facilities/facilities.htm>

### **Complete Streets Funding Program**

A Complete Street is one that provides safe and accessible options for all travel modes - walking, biking, transit and vehicles – for people of all ages and abilities. MassDOT provides funding to municipalities for technical assistance to analyze their community needs and develop a Complete Streets Prioritization Plan, and funding for construction of Complete Streets infrastructure projects. Also inherent in the development of a Complete Street is meeting the most current accessibility guidelines outlined by the Americans with Disabilities Act (ADA) and the Massachusetts Architectural Access Board (AAB), which are upheld by Code of Massachusetts Regulations 521 (521 CMR). MassDOT has allocated \$12.5 million for the first two years, 2016 and 2017. Future funding will be based on the availability of funds and the interest and success of the program. More information about the program can be found here:

<http://www.massdot.state.ma.us/highway/DoingBusinessWithUs/LocalAidPrograms/CompleteStreets.aspx>

### **Community Transit Grant Program**

MassDOT administers the Community Transit Grant Program which is the annual competitive grant program to distribute Federal Transit Administration Section 5310: Enhanced Mobility of Seniors & Individuals with Disabilities funds, and State Mobility Assistance Program funds. This grant program provides funding to assist with mobility management activities, the purchase of capital equipment, and operational costs to meet the mobility needs of seniors, defined as those 65 and older and individuals with disabilities of any age. State Mobility Assistance Program (MAP) funds are to assist in the provision of transportation services to seniors and persons with disabilities. MAP funding is exclusively used for the purchase of eligible vehicles, and most often as a State financial match to federally funded capital vehicle purchases. More information about the program can be found here:

<http://www.massdot.state.ma.us/transit/CommunityTransitGrantProgram/ProgramInformation.aspx>

## **Services**

### **MassRelay Service**

The Massachusetts Department of Mental Health operates the MassRelay service. This service is provided 24 hours, seven days a week, 365 days a year and enables people who are deaf, hard of hearing, late deafening, or speech disabled to communicate with hearing people over regular phone lines. A Relay Operator will complete your call, dialing the party you wish to contact and then stay on the line to relay messages electronically via a TTY or verbally to people who can hear. Dial 711 in Massachusetts or 1-800-439-0183 from anywhere else.

### **Massachusetts Commission for the Deaf & Hard of Hearing (MCDHH) Statewide Interpreter/CART Referral Service**

The MCDHH provides statewide interpreter and Communication Access Realtime Translation (CART) referral services. It provides referral services for sign language, spoken English, oral, tactile and close vision interpreting for Deaf and Deaf-Blind individuals, as well as making referral to freelance CART providers for services. They also provide an After-hours Emergency Interpreter Service, an Interpreter Screening service, Interpreter and CART provider trainings, case management, and technical assistance. More information can be found here:

<http://www.mass.gov/eohhs/gov/departments/mcdhh/programs/cart/>

## **Training and Technical Assistance**

### **Massachusetts Commission for the Deaf & Hard of Hearing (MCDHH)**

MCDHH, through the Communication Access, Training, and Technology Services Department (CATTSS) provides information and training to the public on issues of deafness and hearing loss. Free In-service or educational services/presentations can be provided for any organization or business seeking to improve their effectiveness in interacting with people who are deaf and hard of hearing. They also provide technical assistance on assistive technology to public and private agencies, professional organizations, businesses and individuals related to all aspects of technology for the deaf and hard of hearing individuals. In addition, they also create a number of publications with a wide range of topics related to deafness and hard of hearing. For more information visit their website at:

<http://www.mass.gov/eohhs/gov/departments/mcdhh/programs/communicate-train/>

### **Massachusetts Commission Against Discrimination (MCAD)**

MCAD provides discrimination prevention training to the public and for workplaces. Training sessions range from two hours to four days in length, depending on the topics covered. They also offer Equal Employment Opportunity Certifications for individuals who currently provide, or seek to provide, employment discrimination prevention training, conduct internal

discrimination complaint investigations and/or respond to accommodation requests. For more information visit their website at:

<https://www.mass.gov/training-and-outreach>

### **Massachusetts Office on Disability (MOD)**

MOD's mission is to "bring about full and equal participation of people with disabilities in all aspects of life...in a manner that fosters dignity and self-determination. They have four areas of focus: 1) Providing Training; 2) Advocacy; 3) Monitoring; and 4) Resources. MOD provides training to various entities in a variety of formats on all topics related to the state and federal civil rights laws that govern disability discrimination. Topics may include but are not limited to: ADA, Fair Housing Act, Section 504 of the Rehabilitation Act, M.G.L. Chs. 151b and 272, Service Animals, Vocational Rehabilitation and Independent Living Services and Programs, and Architectural Access Regulations. MOD also provides architectural review/site visits, either through plan review or on-site visits to ensure compliance with the various building requirements specific to persons with disabilities. Training and Architectural Review/Site Visits can be requested at:

<http://www.mass.gov/anf/employment-equal-access-disability/disability-info-and-resources/education-andtraining/customized-trainings.html>

### **ADA Coordinator Certification Program**

The ADA Coordinator Training Certification Program is offered by the University of Missouri and the Great Plain ADA Center Classes are offered online and through trainings offered at various conferences the University hosts. Following the successful completion of the program, the participant will have the knowledge base essential to performing the role of an ADA Coordinator. Course and certification requirements can be found on their website:

<http://www.adacoordinator.org/?page=About>

### **National ADA Symposium**

This premier, national four-day event includes more than eighty breakout sessions on every aspect of ADA. It is a project of the ADA National Network and is organized and run by the Great Plains ADA Center. For more information about the Symposium visit:

<http://www.adasymposium.org/>

### **New England ADA Center**

New England ADA Center is one of 10 regional ADA Centers comprising the ADA National Network. They provide information, guidance and training on ADA tailored to meet the needs of business, government and individuals at local, regional and national levels. Their website has a clearing house of ADA training topics that are no cost web-based courses in addition to publications and best practices resources. It is also a good source of language and examples of draft policies. Their website can be found at:

<https://www.newenglandada.org/>

## Appendices

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- **Completed Self-Assessment Questionnaires**
  - **Municipal Facility Audit Reports**

<b>Department:</b> <b>Library</b>	<b>Dept. Head or Contact: Pat McLeod</b> <b>Phone: 413-458-5369</b>
<b>Program:</b>	<b>Email: pmcleod@williamstownma.gov</b>
<b>Description of program:</b> <b>Library</b>	<b>Location (s) where program is provided:</b> <b>1095 Main St. Williamstown, MA 01267</b>

Service/Program/Facility	Yes	No	N/A	Comment
1. Is there an accessible path of travel to the program space?	X			
2. If toilet rooms are available to the public are they accessible?	X			
3. If toilet rooms are available to employees are the accessible?	X			
4. Do you have procedures for responding to requests by people with disabilities to modify policies/procedures? a. How is information about requesting a modification disseminated?	X			Any comments or needs are reported to the Director. Patron had no hands and needed a touch pad instead of a mouse for the public computers. We added two.  Please give examples.
5. Do you have procedures for providing reasonable accommodations to employees? a. How is information about requesting a reasonable accommodation disseminated?	X			Requests are brought to the Director  Please describe:
6. Are print materials available in alternate formats?		X		
7. Do you have access to appropriate auxiliary aids and services? a. Have you ever used auxiliary aids or services?	X			A Mono Mouse can be borrowed for reading small print and making it large on a computer or smart TV. Special headphones for use with in-house computers

<b>Department:</b> Board Of Assessors		<b>Dept. Head or Contact:</b> Phone: 413 458 9343		
<b>Program:</b>		Email: <a href="mailto:assessors@williamstownma.gov">assessors@williamstownma.gov</a>		
<b>Description of program:</b>		<b>Location (s) where program is provided:</b>		
<b>Service/Program/Facility</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>Comment</b>
1. Is there an accessible path of travel to the program space?	Y			
2. If toilet rooms are available to the public are they accessible?			X	
3. If toilet rooms are available to employees are they accessible?			X	
4. Do you have procedures for responding to requests by people with disabilities to modify policies/procedures? a. How is information about requesting a modification disseminated?			X	Please give examples.
5. Do you have procedures for providing reasonable accommodations to employees? a. How is information about requesting a reasonable accommodation disseminated?			X	Please describe:
6. Are print materials available in alternate formats?	Y			
7. Do you have access to appropriate auxiliary aids and services? a. Have you ever used auxiliary aids or services?			X	If yes, please describe.
8. Does the emergency preparedness plan for your facilities address the needs of individuals with disabilities?			X	If yes, please describe.

<b>Department:</b> TOWN CLERK		<b>Dept. Head or Contact:</b> Mary Kennedy <b>Phone:</b> 413 458 9341		
<b>Program:</b>		<b>Email:</b> mkenneidy@williamstownma.gov		
<b>Description of program:</b> Elections - Town Meeting Local + State		<b>Location (s) where program is provided:</b> Election at Elementary School 115 Church St		
Service/Program/Facility	Yes	No	N/A	Comment
1. Is there an accessible path of travel to the program space?	✓			
2. If toilet rooms are available to the public are they accessible?	✓			
3. If toilet rooms are available to employees are they accessible?	✓			
4. Do you have procedures for responding to requests by people with disabilities to modify policies/procedures? a. How is information about requesting a modification disseminated?		✓		Please give examples.
5. Do you have procedures for providing reasonable accommodations to employees? a. How is information about requesting a reasonable accommodation disseminated?	✓			Please describe:
6. Are print materials available in alternate formats?		✓		
7. Do you have access to appropriate auxiliary aids and services? a. Have you ever used auxiliary aids or services?	✓			State mandated handicapped If yes, please describe. machines provided.
8. Does the emergency preparedness plan for your facilities address the needs of individuals with disabilities?	✓			If yes, please describe. Buddy is completely handicapped accessible with Exit + entrance at gym that we use.



Kessler McGuinness & Associates, LLC

1121 Washington St.  
Newton, MA 02465

V/TTY 617.641.2802  
FAX 617.641.2812

www.kmaccess.com  
info@kmaccess.com

# SENIOR CENTER

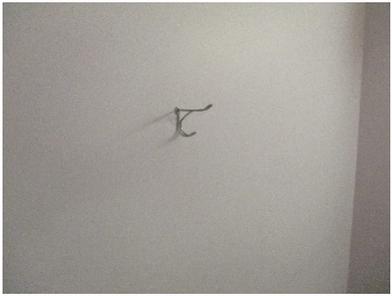
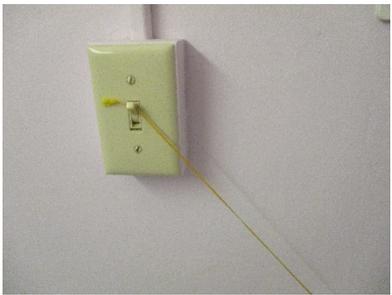
31 NORTH STREET



Audit: May 25, 2018  
Report: June 18, 2018

#	Barrier	Photo	Standard Mitigation	Cost
<b>Senior Center</b>				
1.	<p><b>Curb Cut</b></p> <p>The curb cut near the parallel parking spaces is not compliant.</p>		<p>Install a compliant curb ramp.</p> <p>Unit Cost: \$2,000 ea.</p> <p>Quantity: 1</p>	\$2,000
2.	<p><b>Public Parking Lot</b></p> <ul style="list-style-type: none"> <li>The bottom edge of the parking sign is mounted &lt;60" above the ground.</li> <li>There is no designated van accessible parking space.</li> </ul>		<p>Restripe a portion of the parking area to add one (1) van accessible parking space and its associated access aisle.</p> <p>Unit Cost: \$300 per space or aisle</p> <p>Quantity: 2 (1 van space, 1 aisle)</p> <p>Install van and standard accessible parking signage at minimum 60" above the ground measured to the bottom of the sign.</p> <p>Unit Cost: \$100 ea.</p> <p>Quantity: 7</p>	\$1,300
3.	<ul style="list-style-type: none"> <li>The access aisles do not connect to an accessible route.</li> </ul>		<p>Install a compliant curb ramp at the head of the access aisle.</p> <p>Unit Cost: \$2,000 ea.</p> <p>Quantity: 1</p>	\$2,000

<p>4.</p>	<p><b>Common Room</b></p> <ul style="list-style-type: none"> <li>The tables lack the required minimum 27" AFF knee clearance.</li> </ul>		<p>Provide a wheelchair accessible table.</p> <p>Unit Cost: \$500 Quantity: 1</p>	<p>\$500</p>
<p>5.</p>	<ul style="list-style-type: none"> <li>The computer station lacks the required minimum 27" AFF knee clearance.</li> </ul>		<p>Provide a wheelchair accessible computer station.</p> <p>Unit Cost: \$500 Quantity: 1</p>	<p>\$500</p>
<p>6.</p>	<p><b>Signage</b></p> <ul style="list-style-type: none"> <li>Permanent room signs are not mounted on the latch side of the door and lack tactile/Braille characters.</li> <li>There is no tactile/Braille signage at the doors to exit passageways, exit discharges, or exit stairways.</li> </ul>		<p>Install tactile/Braille signage on the latch side of the door. Include the International Symbol of Access where applicable. Coordinate with location and mounting height requirements.</p> <p>Unit Cost: \$100 ea. Est. Quantity: 6</p>	<p>\$600</p>
<p>7.</p>	<p><b>Men's &amp; Women's Multiuser Toilet Rooms</b></p> <ul style="list-style-type: none"> <li>The sink lacks the required minimum 27" AFF knee clearance, @ 26" AFF.</li> <li>The lavatory pipes are not insulated.</li> </ul>		<p>Modify or remove the apron.</p> <p>Unit Cost: \$200 Quantity: 2</p> <p>Insulate the lavatory pipes.</p> <p>Unit Cost: \$50 ea. Quantity: 2</p>	<p>\$500</p>

8.	<ul style="list-style-type: none"> <li>The coat hook is mounted &gt;48" AFF, @ 60" AFF.</li> </ul>		<p>Provide a lowered coat hook mounted 48" AFF maximum.</p> <p>Unit Cost: \$50 ea. Quantity: 2</p>	\$100
9.	<ul style="list-style-type: none"> <li>The centerline of the toilet paper dispenser is not mounted 7"-9" from the toilet rim.</li> </ul>		<p>Remount the toilet paper dispenser so the centerline is between 7"-9" from the toilet rim.</p> <p>Unit Cost: \$50 ea. Quantity: 2</p>	\$100
10.	<ul style="list-style-type: none"> <li>The emergency pull cord requires tight grasping, pinching, and/or twisting of the wrist to operate.</li> </ul>		<p>Replace the control.</p> <p>Unit Cost: \$250 ea. Quantity: 2</p>	\$500
11.	<p><b>Women's Multiuser Toilet Room</b></p> <ul style="list-style-type: none"> <li>The reflective surface of the mirror is &gt;35" AFF.</li> </ul>		<p>Lower/replace the existing mirror or install a full-length mirror.</p> <p>Unit Cost: \$50 Quantity: 1</p>	\$50

<p>12.</p>	<ul style="list-style-type: none"> <li>The grab bar configuration is not compliant.</li> </ul>		<p>Install compliant grab bars. Unit Cost: \$150 Quantity: 2</p>	<p>\$300</p>
<p>13.</p>	<p><b>Men's Multiuser Toilet Room</b></p> <ul style="list-style-type: none"> <li>The wall obstructs the required 60" clearance at the water closet.</li> </ul>		<p>Additional study required.</p>	<p>\$0</p>
<p><b>SUBTOTAL FOR SENIOR CENTER</b></p>				<p><b>\$8,450</b></p>



Kessler McGuinness & Associates, LLC

1121 Washington St.  
Newton, MA 02465

V/TTY 617.641.2802  
FAX 617.641.2812

www.kmaccess.com  
info@kmaccess.com

# TOWN HALL

31 NORTH STREET



Audit: May 25, 2018  
Report: June 18, 2018

#	Barrier	Photo	Standard Mitigation	Cost
<b>Town Hall</b>				
14.	<b>Front Entry Ramp</b> <ul style="list-style-type: none"> <li>• The ramp has a slope &gt;8.3%, @ 9.4%.</li> <li>• There is an abrupt change in level where the ramp meets the sidewalk.</li> </ul>		Install a compliant ramp. Unit Cost: \$15,000 ea. Quantity: 1	\$15,000
15.	<b>Front Parking Space</b> There is no designated van accessible parking space.		Restripe a portion of the parking lot to provide a van accessible parking space, as well as its associated access aisle. Unit Cost: \$300 per space or aisle Quantity: 2 (1 van space, 1 aisle)	\$600
16.	<b>Front Entry Threshold</b> The threshold is >1/2", @ 1".		Replace the threshold. Unit Cost: \$300 ea. Quantity: 1	\$300

17.	<p><b>Rear Parking Space</b></p> <ul style="list-style-type: none"> <li>The designated accessible parking space and its associated access aisle have slopes &gt;2%, @ 3.5%.</li> <li>The bottom edge of the parking sign is mounted &lt;60" above the ground.</li> <li>There is no designated van accessible parking space.</li> </ul>		<p>Regrade and restripe the existing parking area to add one (1) van accessible parking space and its associated access aisle.</p> <p>Unit Cost: \$1,500 per space or aisle Quantity: 2 (1 van, 1 aisle)</p> <p>Install van accessible parking signage at minimum 60" above the ground measured to the bottom of the sign.</p> <p>Unit Cost: \$100 ea. Quantity: 1</p>	\$3,100
18.	<p><b>Rear Entry Ramp</b></p> <p>There is an abrupt change in level where the ramp meets the asphalt.</p>		<p>Patch the existing ramp to provide a smooth transition.</p> <p>Unit Cost: \$75 per SF Est. Quantity: 6 SF</p>	\$450
19.	<p><b>Visual Alarms</b></p> <p>All spaces lack visual/audible alarms.</p>	<p>No Image</p>	<p>Install visual/audible alarms.</p> <p>Unit Cost: \$500 ea. Est. Quantity: 20</p>	\$10,000

<p>20.</p>	<p><b>Community Development Office</b></p> <ul style="list-style-type: none"> <li>The transaction counter is &gt;36" AFF, @ 43.5" AFF.</li> </ul>		<p>Lower a minimum 36" portion of the counter to maximum 36" AFF or provide an auxiliary counter.</p> <p>Unit Cost: 1,500 ea. Quantity: 1</p>	<p>\$1,500</p>
<p>21.</p>	<ul style="list-style-type: none"> <li>The pull side door maneuvering clearance is &lt;60" deep, @ 56".</li> </ul>	<p>No Image</p>	<p>Modify the door or install an automatic door opener.</p> <p>Unit Cost: \$2,500 ea. Quantity: 1</p>	<p>\$2,500</p>
<p>22.</p>	<p><b>Signage</b></p> <ul style="list-style-type: none"> <li>Permanent room signs are not mounted on the latch side of the door and lacks tactile/Braille characters.</li> <li>There is no tactile/Braille signage at the doors to exit passageways, exit discharges, or exit stairways.</li> <li>The existing signage reduces the required 80" AFF minimum headroom, @ 78" AFF.</li> </ul>		<p>Install tactile/Braille signage on the latch side of the door. Include the International Symbol of Access where applicable. Coordinate with location and height requirements.</p> <p>Unit Cost: \$100 ea. Est. Quantity: 20</p> <p>Reposition/replace existing signage.</p> <p>Unit Cost: \$50 ea. Est. Quantity: 20</p>	<p>\$3,000</p>

<p>23.</p>	<p><b>Veterans Agent &amp; Town Clerk Offices</b></p> <p>The door has hardware that requires tight grasping, pinching, and/or twisting of the wrist to operate.</p>		<p>Replace the door hardware with lever type.</p> <p>Unit Cost: \$300 ea.</p> <p>Quantity: 2</p>	<p>\$600</p>
<p>24.</p>	<p><b>Treasurer/Collector's Office</b></p> <ul style="list-style-type: none"> <li>The lowered portion of the transaction counter is &lt;36" wide, @ 24" wide.</li> </ul>		<p>Widen the lowered portion of the counter to 36" wide.</p> <p>Unit Cost: 1,500 ea.</p> <p>Quantity: 1</p>	<p>\$1,500</p>
<p>25.</p>	<ul style="list-style-type: none"> <li>The door requires &gt;5 lbs of force to open.</li> </ul>		<p>Adjust the door closer.</p> <p>Unit Cost: \$50</p> <p>Quantity: 1</p>	<p>\$50</p>

<p>26.</p>	<p><b>Board of Selectmen</b></p> <ul style="list-style-type: none"> <li>The table lacks the required minimum 27" AFF knee clearance, @ 24" AFF.</li> </ul>		<p>Provide a wheelchair accessible table.</p> <p>Unit Cost: \$500 Quantity: 1</p>	<p>\$500</p>
<p>27.</p>	<ul style="list-style-type: none"> <li>The threshold is &gt;1/2", @ 1".</li> </ul>		<p>Replace the threshold.</p> <p>Unit Cost: \$300 ea. Quantity: 1</p>	<p>\$300</p>
<p>28.</p>	<p><b>Designated Accessible Unisex Toilet Room</b></p> <ul style="list-style-type: none"> <li>The exterior door requires &gt;5lbs of force to open.</li> <li>The interior door has hardware that requires tight grasping, pinching, and/or twisting of the wrist to operate.</li> </ul>		<p>Adjust the door closer.</p> <p>Unit Cost: \$50 Quantity: 1</p> <p>Replace the door hardware with lever type.</p> <p>Unit Cost: \$300 ea. Quantity: 1</p>	<p>\$350</p>

<p>29.</p>	<ul style="list-style-type: none"> <li>The lavatory pipes are not insulated.</li> </ul>		<p>Insulate the lavatory pipes.</p> <p>Unit Cost: \$50 ea. Quantity: 1</p>	<p>\$50</p>
<p>30.</p>	<ul style="list-style-type: none"> <li>The grab bar configuration is not compliant.</li> <li>The centerline of the toilet paper dispenser is not mounted 7"-9" from the toilet rim, @ 14" .</li> </ul>		<p>Install compliant grab bars.</p> <p>Unit Cost: \$150 Quantity: 2</p> <p>Remount the toilet paper dispenser so the centerline is 7"-9" from the toilet rim.</p> <p>Unit Cost: \$50 ea. Quantity: 1</p>	<p>\$350</p>
<p>31.</p>	<ul style="list-style-type: none"> <li>The coat hook is mounted &gt;48" AFF, @ 68" AFF.</li> </ul>		<p>Provide a lowered coat hook mounted maximum 48" AFF.</p> <p>Unit Cost: \$50 ea. Quantity: 1</p>	<p>\$50</p>

<p>32.</p>	<ul style="list-style-type: none"> <li>• The flush valve is not mounted on the open side of the water closet.</li> <li>• The heater obstructs the clear floor space around the water closet.</li> </ul>		<p>Install a compliant lever flush valve or an automatic flush valve.</p> <p>Unit Cost: \$1,500 ea. Quantity: 1</p> <p>Relocate/replace the heater.</p> <p>Unit Cost: \$500 Quantity: 1</p>	<p>\$2,000</p>
<p>33.</p>	<p><b>Men's &amp; Women's Multiuser Toilet Rooms</b></p> <p>The toilet rooms lack accessible elements.</p>		<p>Provide directional signage to the designated accessible toilet room.</p> <p>Unit Cost: \$50 ea. Quantity: 2</p>	<p>\$100</p>
<p><b>SUBTOTAL FOR TOWN HALL</b></p>				<p><b>\$42,300</b></p>



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1121 Washington St.  
Newton, MA 02465

V/TTY 617.641.2802  
FAX 617.641.2812

www.kmaccess.com  
info@kmaccess.com

# TRANSFER STATION

NEAR ROUTE 7



#	Barrier	Photo	Standard Mitigation	Cost
<b>Transfer Station</b>				
34.	<p><b>Accessible Route</b></p> <p>The transfer station is not accessible due to the following:</p> <ul style="list-style-type: none"> <li>• Trash receptacles are not within an accessible reach range.</li> <li>• There is no designated accessible parking.</li> <li>• There is no accessible route to the trash sticker office.</li> </ul>		<p>Provide operational accommodation to persons with disabilities for trash removal and sticker transactions.</p>	N/A
<b>SUBTOTAL FOR TRANSFER STATION</b>				<b>\$0</b>
<b>TOTAL FOR MUNICIPAL BUILDINGS</b>				<b>\$50,750</b>



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1121 Washington St.  
Newton, MA 02465

V/TTY 617.641.2802  
FAX 617.641.2812

www.kmaccess.com  
info@kmaccess.com

# RECREATION & OPEN SPACE

WILLIAMSTOWN, MA



Audit: May 24, 2018  
Report: June 18, 2018

#	Barrier	Photo	Standard Mitigation	Cost
<b>Broad Brook Park</b>				
1.	<p><b>Parking</b></p> <p>There are no designated accessible parking spaces.</p>		<p>Install a van accessible parking sign.</p> <p>Unit Cost: \$100 ea.</p> <p>Quantity: 1</p>	\$100
2.	<p><b>Accessible Route</b></p> <p>There is no accessible route connecting all public elements (i.e. playground, baseball field, portable toilet, picnic tables, basketball court, etc.). The surfaces are grass, dirt, and gravel.</p>		<p>Additional study required.</p>	\$100,000
<b>SUBTOTAL FOR BROAD BROOK PARK</b>				<b>\$100,100</b>
<b>Lowry Property</b>				
3.	<p>There are no ADA applicable barriers at this location.</p>		<p>No action required.</p>	N/A
<b>SUBTOTAL FOR LOWRY PROPERTY</b>				<b>\$0</b>

Linear Parks				
4.	<p><b>Tennis Court Parking Area</b></p> <p>There are no designated accessible parking spaces.</p>		<p>Install a van accessible parking sign.</p> <p>Unit Cost: \$100 ea.</p> <p>Quantity: 1</p>	\$100
5.	<p><b>Accessible Route to Tennis Court</b></p> <p>There is no accessible route to the tennis court.</p>		<p>Provide an accessible route.</p>	\$8,000
6.	<p><b>Benches &amp; Trash Receptacles</b></p> <p>The benches and trash receptacles are not located on an accessible route.</p>		<p>Relocate one bench and trash receptacle adjacent to the accessible route.</p> <p>Unit Cost: \$100 ea.</p> <p>Quantity: 2</p>	\$200

7.	<p><b>Accessible Route</b></p> <ul style="list-style-type: none"> <li>The walkway has a slope &gt;5%, @ 15.8%.</li> </ul>		<p>Regrade the walkway. Unit Cost: \$75 per SF Quantity: 50 SF</p>	\$3,750
8.	<ul style="list-style-type: none"> <li>The curb ramp has a slope &gt;8.3%, @ 9.4%.</li> </ul>		<p>Install a compliant curb ramp. Unit Cost: \$2,000 ea. Quantity: 1</p>	\$2,000
<b>SUBTOTAL FOR LINEAR PARKS</b>				<b>\$14,050</b>
<b>Margaret Lindley Park</b>				
9.	<p><b>Parking</b></p> <p>There is no designated van accessible parking space.</p>		<p>Install a van accessible parking sign. Unit Cost: \$100 ea. Quantity: 1</p>	\$100

<p>10.</p>	<p><b>Accessible Route</b></p> <p>There is no accessible route connecting all public elements (i.e. playground, pond, portable toilet, picnic tables, tetherball, etc.). The surfaces are grass, dirt, and gravel.</p>		<p>Additional study required.</p>	<p>\$100,000</p>
<p>11.</p>	<p><b>Men's &amp; Women's Multiuser Toilet Rooms</b></p> <ul style="list-style-type: none"> <li>There is no tactile/Braille signage mounted on the latch side of the door.</li> </ul>		<p>Install tactile/Braille signage with the International Symbol of Access on the latch side of the door. Coordinate with location and height requirements.</p> <p>Unit Cost: \$50 ea. Quantity: 2</p>	<p>\$100</p>
<p>12.</p>	<ul style="list-style-type: none"> <li>The coat hooks are mounted &gt;48" AFF, @ 60" AFF.</li> </ul>		<p>Provide a lowered coat hook mounted 48" AFF maximum.</p> <p>Unit Cost: \$50 ea. Quantity: 4 (2 inside stalls, 2 in dressing areas)</p>	<p>\$200</p>
<p>13.</p>	<ul style="list-style-type: none"> <li>The reflective surface of the mirror is mounted &gt;40" AFF, @ 43" AFF.</li> </ul>		<p>Lower the mirror or install a full-length mirror.</p> <p>Unit Cost: \$200 ea. Quantity: 2</p>	<p>\$400</p>

14.	<ul style="list-style-type: none"> <li>There is no visual/audible alarm.</li> </ul>	<p>No Image</p>	<p>Install a visual/audible alarm.</p> <p>Unit Cost: \$500 ea.</p> <p>Quantity: 2</p>	<p>\$1,000</p>
15.	<ul style="list-style-type: none"> <li>The stall lock requires tight grasping, pinching, and/or twisting of the wrist to operate.</li> </ul>		<p>Replace the lock.</p> <p>Unit Cost: \$50 ea.</p> <p>Quantity: 2</p>	<p>\$100</p>
16.	<ul style="list-style-type: none"> <li>The side wall grab bar is &lt; 33"-36" AFF, @ 31" AFF.</li> <li>The side wall grab bar extends &lt;54" from the rear wall, @ 48".</li> </ul>		<p>Remount the side grab bar.</p> <p>Unit Cost: \$150 ea.</p> <p>Quantity: 2</p>	<p>\$300</p>
17.	<ul style="list-style-type: none"> <li>The transition from the gravel to the toilet rooms is not flush and has a vertical level change &gt;1/4" or &gt; 1/2" beveled with a maximum 1:2 slope?.</li> </ul>		<p>Replace the transition.</p> <p>Unit Cost: \$100 ea.</p> <p>Quantity: 2</p>	<p>\$200</p>

18.	<p><b>Women's Multiuser Toilet Room</b></p> <p>The toilet centerline is &gt;18" from the side wall, @ 19".</p>		<p>Relocate the toilet so the centerline is 18" from the side wall, or furr out the wall.</p> <p>Unit Cost: \$500 ea. Quantity: 1</p>	\$500
<b>SUBTOTAL FOR MARGARET LINDLEY PARK</b>				<b>\$102,900</b>
<b>The Spruces</b>				
19.	<p><b>Parking</b></p> <p>There are no designated accessible parking spaces.</p>		<p>Install a van accessible parking sign.</p> <p>Unit Cost: \$100 ea. Quantity: 1</p>	\$100
20.	<p><b>Waste Receptacles</b></p> <p>The trash and dog waste receptacles are not located along an accessible route.</p>		<p>Provide a trash can and dog waste receptacle adjacent to the van accessible parking space.</p> <p>Unit Cost: \$100 ea. Quantity: 2</p>	\$200
<b>SUBTOTAL FOR THE SPRUCES</b>				<b>\$300</b>
<b>TOTAL FOR RECREATION &amp; OPEN SPACE</b>				<b>\$217,350</b>