



Town of Ashland, Massachusetts

PART A: Executive Summary

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Introduction

The Institute for Human Centered Design (IHCD) has prepared this report on behalf of the Town of Ashland, Massachusetts as part of the Town's ongoing effort to assess the current level of ADA compliance in programs, services and activities and Town-owned facilities. In preparing for this report, IHCD teams surveyed the Town's portfolio of facilities and properties that were included in the Request for Proposal.

The building facility survey set includes six (6) public buildings and four (4) schools. The accessibility survey of those facilities includes all the spaces where the Town offers programs, services and activities to members of the public. The outdoor facility set includes two (2) parks/outdoor areas. The accessibility survey of those spaces encompassed elements such as accessible routes, walking surfaces, slopes, picnic tables, play areas and recreational areas. In addition, the parking lots associated with all facilities were also surveyed.

Also, an ADA accessibility assessment of the Town's streets, sidewalks and walkways at four major circulation routes including Main Street, Homer Avenue, Summer Street and Pleasant Street were part of the surveys.

The Town of Ashland is participating in the Massachusetts Department of Transportation (MassDOT) Complete Streets Funding Program. The Program provides technical assistance and construction funding to eligible municipalities that have passed a Complete Streets Policy and developed a Prioritization Plan. The Town of Ashland developed a street policy (<https://masscompletestreets.com/PublicDownload.ashx?aWQ9NjA1JnRpZXJJZD0x>) and a prioritization plan in 2018, and the project was approved on August 17, 2018.

IHCD submitted separate reports for each facility that was surveyed. To assist in prioritizing accessibility improvements to ensure compliance with the ADA Title II, each of the submitted reports include an overview that identifies the most substantial accessibility issues and order of magnitude cost estimates for corrective action. Additionally, a detailed catalog that supplements the ADA Self-Evaluation narrative overview is also included. The catalog provides element-by-element photos of compliance issues, location and measurements - when applicable - at each assessed facility or outdoor area accompanied by recommendations and cost estimation for each accessibility issue.

In addition, a spreadsheet of priorities for corrective action organized by type of building and including order of magnitude cost has been provided to the Town. When the Town presents findings and recommendations to the community and receives feedback, some recommendations may need cost adjustment. The spreadsheet is a capital planning and budgeting tool - the “*ADA Transition Plan*” - and are intended as a long-term tool to update as work is completed. The Town should make a good faith effort to complete the work in a reasonable time. (IHCD recommends a three to five-year period). The ADA regulations do not set out precise timeframes to complete the work; we are basing the timeframes on conversations with the Department of Justice and their Project Civic Access settlement agreements with municipalities.

Together, the ADA Self-Evaluation and ADA Transition Plan will enable the Town to make substantial progress in meeting its ADA responsibilities. The recommendations for corrective action of policies and procedures of the ADA Self-Evaluation are not included in the ADA Transition Plan since that is limited to capital accessibility issues. But they are a blueprint for meeting compliance responsibilities other than capital expenses.

A complete assessment of the Town’s policies, practices and procedures was also submitted. The ADA administrative requirements help ensure that the needs of people with disabilities are addressed in all services, programs and activities that the Town provides. See the complete summary in *Part B – Evaluation of Non – Discriminatory Policies and Practices in Programs, Services and Activities* report.

A complete website accessibility report was also submitted that provides information about website accessibility issues and recommendations for corrective measures.

Most Town-owned facilities recently altered or renovated are substantially accessible and meet most architectural requirements. Continued facility alterations, and/or renovations will significantly reduce barriers and realize the Town’s commitment to inclusion and equal rights. In the meantime, the greatest problems posed by existing barriers can be ameliorated by establishing policies and procedures to accommodate members of the community with disabilities. It is worth noting that the Town has taken several significant steps in this direction:

- The Town of Ashland has hired a consultant (IHCD) to undertake its ADA self-evaluation.
- The Town has adopted a Public Notice Policy.
- The Town has developed a Grievance Procedure.

- The Town is participating in the Complete Street program and has developed a street policy. It is worth mention that since the time of the ADA accessibility assessment, many intersections have been updated.

In addition, Pond Street, which is a major commercial corridor, will be having its sidewalks completely re-done. Information about the Pond Street Revitalization can be found here: <https://www.ashlandmass.com/523/Rehabilitation-of-Pond-St>

IHCD's review and recommendations of the Town-owned facilities was based on compliance with the 2010 ADA Standards for Accessible Design if not compliant with the 1991 ADA Standards and/or 521 CMR of the Massachusetts Architectural Access Board. Best practice and inclusive design recommendations were also provided for each property. Inclusive design recommendations include elements that are not required in the accessibility standards but may create enhanced experiences for all users.

Many key facilities are generally usable by people with disabilities but are not in full compliance with current accessibility requirements. The Town Hall, for instance, provides access to many programs because the building features an accessible rear entrance and has an elevator that provides an accessible route to all floors. Also, the service counters throughout the building are accessible which allows access to many services in the Town Hall. Yet a key area such as the Meeting Room lacks an assistive listening system. The Library is another example of a facility that provides access to its programs. While the building has an accessible entrance and accessible exits, they lack the required egress signs including the illuminated egress sign with the International Symbol of Accessibility (ISA).

Due to the lack of accessibility at the Department of Public Works (DPW), IHCD recommends that the Town not use the building for its programs, services and activities. The Town currently works to make sure alternative meeting locations are available for anyone in need of DPW services, and is exploring a permanent location change to an accessible location.

Any corrective actions needed to ensure program accessibility must comply with the requirements of the 2010 ADA Standards and/or 521 CMR. Furthermore, when doing alterations and/or renovations, keep in mind that an alteration that decreases the accessibility of a building below the requirements for new construction at the time of the alteration is prohibited.

Key Recommendations for the Building Facilities:

- Where parking is provided, ensure fully accessible parking spaces are provided and locate the accessible parking spaces near the accessible entrances. At the Community Center, the accessible parking spaces are not located on the closest route to the accessible entrance.
- Ensure that fully accessible toilet rooms are provided in each building where programs services or activities are provided. Where it is technically infeasible to provide accessible multi-user toilet rooms or where single-user toilet rooms are not compliant, provide an accessible single-user toilet room (e.g., Police Substation).
- If audible communication is integral to the use of a space, provide a compliant assistive listening system (e.g., Meeting Room in the Town Hall).

Key recommendations for the Public Schools:

- Ensure that fully accessible toilet rooms are provided in each building. As mentioned before, where it is technically infeasible to provide accessible multi-user toilet rooms provide an accessible single-user toilet room in the same area as the existing multi-user toilet rooms.
- In unique rooms such as a nurse's room, if there is a toilet in the room, ensure that a fully accessible toilet room is provided. This includes maintaining the clear floor space at all fixtures free of any storage.
- Ensure that accessible sinks (with knee and toe clearance) are provided in at least one classroom per grade. If accessible sinks are already provided, ensure they have insulated pipes.
- Ensure accessible work surfaces are provided in at least one classroom per grade. Furthermore, ensure that specialized classrooms (e.g., computer lab, STEM classroom, art room, etc.) all have accessible work surfaces.
- If audible communication is integral to the use of a space, provide a compliant assistive listening system. This should be a priority in classrooms or auditoriums where speakers are provided.

Regarding outdoor areas, the ADA does not require that all parks and playgrounds be made accessible, the Town's obligation is to ensure *Program Accessibility*. To determine which parks, playgrounds and outdoor spaces must be made accessible, the Town should consider:

- How to provide the program in the most integrated setting appropriate;
- Locations where the activities are offered;

- Which outdoor areas are accessible and to what extent;
- Level of dispersion of the accessible outdoor areas (playgrounds, baseball fields, soccer fields, beaches, etc.,) and convenience to reach them (accessible by car, public transportation or pedestrian routes).
- Ensure that a certain number of amenities (at least 5%, but not less than one) in the parks/outdoor spaces are accessible (e.g., picnic tables, service counters at concession stands, etc.).
- If portable toilets are provided, ensure an accessible portable toilet is provided in the same area. Ensure the accessible portable toilet is located on an accessible route.

Key Recommendations for the Outdoor Facilities

- Ensure that accessible routes that connect all areas of sport activity are provided. This includes the areas of sport activity at all the schools and the outdoor areas.
- Ensure an accessible route to and around each play component in the playground is provided (Pittaway Elementary School, Warren Elementary School and the playground located at behind the Community Center).

The playgrounds have Engineered Wood Fiber (EWF) as a surface. Note that the Massachusetts Architectural Access Board (MAAB) does not consider Engineered Wood Fiber (EWF) to comply with its regulation requiring an accessible route to and around playground equipment.