



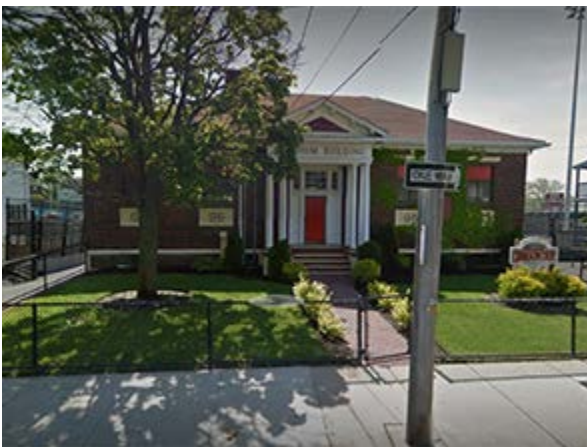
# City of Everett

## ADA Self-Evaluation:

Executive Summary; Evaluation of Non-discriminatory Policies and Practices in Programs, Services, and Activities, and Evaluation of Facilities



Prepared by the  
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## Introduction

The Institute for Human Centered Design (IHCD) has prepared this report on behalf of the City of Everett as part of the City’s on-going effort to assess the current level of ADA compliance in programs, services and activities and City-owned facilities. In preparing for the report, IHCD surveyed a selection of the City’s portfolio of facilities and properties that was included in the Request for Proposals. This report includes fourteen (14) City facilities and one (1) park.

This ADA Self-Evaluation report includes model policies and procedures for adoption by the City, and a summary of architectural barriers and proposed solutions for the City’s facilities. All are designed to help move the City towards full compliance with its obligations under the Title II of the Americans with Disabilities Act (ADA) and/or the 521 CMR Massachusetts Architectural Access Board regulations.

Most City-owned facilities recently altered or renovated are substantially accessible and meet most architectural requirements. Continued facility replacements, alterations, and/or renovations will substantially reduce barriers and realize Everett’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 City has taken several significant steps in this direction:

- Everett has hired a consultant (IHCD) to undertake its ADA self-evaluation (as basis for the City’s transition plan);
- Everett has an ADA Coordinator in place, Omar Easy.

However, many key facilities and outdoor areas are “functionally accessible” meaning that they are generally usable by people with disabilities but are not in full compliance with current accessibility requirements, though they may have been compliant when they were built or last renovated – before 1991. City Hall is an example of such a “functionally accessible” facility: most programs can be accessed by most people because the building features accessible entrances, partially accessible toilet rooms, and has accessible routes through most of the building; yet the building does not have accessible service counters, a key component to access some of the services provided by the City. And many individuals with mobility disabilities would have difficulty using the toilet rooms.

For clarity, this ADA Self-Evaluation report is organized as follows:

- Legal Overview
- Executive Summary of the Evaluation of Policies in Programs, Services, and Activities
- Executive Summary of the Evaluation of Facilities.

## I. Legal Overview

The City of Everett is obligated by both Federal laws and State codes concerning the rights of people with disabilities in the daily provision of programs, services, and activities. At the end of this report, there is a comprehensive list of relevant laws and executive orders.

### **Federal Obligation: American with Disabilities Act (ADA)**

Based on the 1964 Civil Rights Act and expanding upon the obligations of the 1973 Rehabilitation Act, the ADA of 1990 prohibits discrimination against people with disabilities. The ADA provides civil rights protections to individuals with disabilities similar to those afforded to individuals on the basis of race, color, sex, national origin, age, and religion. The cornerstone of Title II of the ADA, which applies to state and local governments, is clear: program accessibility. No qualified person with a disability may be excluded from participating in, or denied the benefits of, the programs, services, and activities provided by state and local governments because of a disability.

The 2008 Amendments to the ADA (ADAAA), signed into law on September 25, 2008, describes in more detail the range of conditions covered by the civil rights protections of the ADA. The amendments expand the definition of “disability” to include impairments that substantially limit a major life activity and states that when determining whether someone qualifies as disabled, one cannot take into account assistive devices, auxiliary aids, accommodations, medical therapies and supplies. The amendments also address episodic disabilities that may go into remission but still can significantly limit a major life activity when active, such as epilepsy and post-traumatic stress disorder. The ADA defines a disability as<sup>1</sup>:

- A physical or mental impairment that substantially limits one or more major life activities (i.e. working, talking, hearing, seeing, caring for one's self);
- Having a record of a physical or mental impairment that substantially limits one or more major life activities;
- Being regarded by others as having an impairment such as individuals with severe facial scarring.

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<sup>1</sup> To learn more about qualified individuals with disabilities or to read the full text of the ADA, please visit <http://www.ada.gov>

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It is important to stress that the primary obligation to public entities such as the City of Everett, under Title II of the Americans with Disabilities Act, is to ensure that, when viewed in their entirety, the programs, services, and activities offered are equally available to people with disabilities. Cities are required to follow the 2010 ADA Standards for Accessible Design in new construction and major alterations. If corrective actions are required in existing facilities that do not already meet the earlier standard of the ADAAG (ADA Accessibility Guidelines), they must also comply with the ADA 2010 Standards. They also must relocate programs or otherwise provide access to programs located in inaccessible older facilities (i.e. facilities built before the ADA went into effect January 26, 1992). Ensuring program access may require capital investment when there is no alternative solution and should be a priority for corrective action.

Note that the websites of Title II entities are also considered “programs” and should be accessible to the standards of the Web Content Accessibility Guidelines 2.0 AA. Review of the City of Everett’s website will be provided in a separate report.

Cities must **communicate effectively** with people who have hearing, vision, or speech disabilities. And they are required to make reasonable modifications to policies, practices, and procedures where necessary to ensure the equal participation of people with disabilities. In addition, the ADA requires the provision of “auxiliary aids and services” to meet their responsibility for effective communication.

Following the passage of the ADA, the Department of Justice issued the 1991 ADA Standards for Accessible Design to address physical access to facilities and transportation. These standards were based almost exclusively on the US Access Board’s guidelines (ADA Accessibility Guidelines – ADAAG). In 1994, slight technical amendments were made. Then in 2004, after years of public comment, the US Access Board issued new guidelines that were promptly adopted by US Department of Transportation and other federal agencies. But only in 2010 did the Department of Justice issue a revised and updated ADA Standard called the 2010 ADA Standards for Accessible Design (2010 ADA Standards) that would apply to all Title II and Title III entities. These standards revised requirements for policies such as ticketing and service animals, and for physical elements such as assembly seating, established construction tolerances for certain elements and formalized long-standing guidelines for play areas, recreational boating facilities, pools, and other recreational facilities.

Facilities that meet or exceed 1991 ADA Standards are not required to make changes to the new standards except in the case of significant renovation. For elements that are non-compliant, the corrective measures must align with the 2010 ADA Standards. It is not expected that the buildings will meet or be brought up to all of the 2010 ADA Standards absent significant or total renovation.

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State and local governments must ensure that individuals with disabilities are not excluded from services, programs, and activities because buildings are inaccessible. This means Title II entities need not remove physical barriers, such as stairs, in all existing buildings, as long as they make their programs accessible to individuals who are unable to use an inaccessible existing facility.

#### Alterations to historic properties under the ADA

New alterations to historic properties must comply with the specific provisions governing historic properties in the 2010 ADA Standards, to the maximum extent feasible. Under those provisions, alterations should be done in full compliance with the alterations standards for other types of buildings. However, if following the usual standards would threaten or destroy the historic significance of a feature of the building, alternative solutions may be used. The decision to use alternative solutions for that feature must be made in consultation with the appropriate historic advisory board designated in the 2010 ADA Standards, and interested persons should be invited to participate in the decision-making process.

Note that any corrective actions needed to ensure program accessibility would also have to comply with the requirements of the 2010 ADA Standards for historic facilities.

#### **State Obligation:**

##### Massachusetts Architectural Access Board

The Architectural Access Board (AAB) is a regulatory agency whose mandate is to develop and enforce regulations designed to make public buildings accessible to, functional for and safe for use by persons with disabilities. See the Rules and Regulations of the Architectural Access Board 521 C.M.R. In addition to writing regulations, the Board decides on variance requests, provides training on its regulations, issues advisory opinions and makes decisions on complaints. Local building inspectors are responsible for enforcing the regulations, which are a specialized section of the Massachusetts Building Code. See 780 C.M.R.

The construction, reconstruction, remodeling, alteration, or change of use of a building or facility that is open to the public triggers the authority of the AAB. New construction must fully comply.

For renovation, remodeling, or alteration:

- The work being done must comply with the regulations.
- If the work done in any 36-month period is greater than \$100,000, the “work being performed” is required to comply. In addition, an accessible entrance and an accessible toilet room, telephone and drinking fountain (if toilets, telephones and drinking fountains are provided) shall also be provided.

- If the work done in a 36-month period is more than 30% of the “full and fair cash value” of the building,<sup>1</sup> the entire building must come into compliance.

Enforcement: Anyone can file a complaint with the Board. The Board has the authority to issue variances and/or impose fines of up to \$1000 per violation per day of noncompliance with its order.

See Appendix B of this Report for a Reference List of Relevant Laws and Executive Orders pertaining to Nondiscrimination on the Basis of Disability.

<sup>1</sup> This is usually the assessed value established by the Town or City. See [521 C.M.R. § 5.38](#) for details about establishing value where no assessment exists.



## II. Executive Summary of the Evaluation of Policies in Programs, Services and Activities

Title II of the Americans with Disabilities Act (ADA) prohibits discrimination against qualified individuals with disabilities by public entities. Activities covered include all services, programs and activities offered by the public entity, all aspects of employment, services carried out by contractors, all activities of the local legislative and judicial branches and public transportation.

A thorough understanding of the requirements of Title II of the ADA is an essential responsibility of public entities.

The ADA administrative requirements help ensure that the needs of people with disabilities are addressed in all services, programs and activities that the City operates. A Title II entity is required to:

1. Designate a Responsible Employee (ADA Title II - 28 CFR Part 35.107 (a)) to coordinate compliance with the ADA. The purpose of having a responsible employee – ADA Coordinator - is to ensure that when the public deals with a state or local government agency the public is able to identify a person who is knowledgeable with the requirements of the ADA.
  - The City of Everett has met its obligation to designate a responsible employee by appointing Omar Easy as the City's ADA Coordinator. However, he is not called out online on the City's website.
2. Adopt and distribute a public Notice (ADA Title II - 28 CFR Part 35.106) of the provisions of the ADA to members of the public who may participate in the City's programs, services and activities. The effective notice should state the City's obligations under the ADA and include the complete contact information of the ADA Coordinator.

From the questionnaire responses, it appears that most departments are not aware of their ADA Notice obligations.

The City should consider publishing the Notice in all the materials distributed by the City; post the Notice on the City's website home page ([www.cityofeverett.com](http://www.cityofeverett.com)). Also, post copies in public locations in the City's buildings.

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3. Develop and distribute Grievance Procedures (ADA Title II - 28 CFR Part 35.107 (b)) for prompt resolution of any complaint regarding disability discrimination.

From the responses submitted by the majority of staff, some departments refer to the City's grievance procedures, others responded that they "have no ADA grievance procedures." It is not clear if staff is aware of their ADA obligation and the process for meeting the requirement for grievance procedures.

IHCD recommends the City take steps to clarify its grievance process for both employees and members of the public and post that information in print and on the City's website.

4. Modify its Policies, Practices and Procedures (ADA Title II – 28 CFR Part 35.130(b)(7)) when necessary to avoid discrimination.

From the responses submitted by the staff, it is not clear whether some departments are aware of or know about their obligations.

IHCD recommends that the City ensure that staff be trained in the policies, practices and procedures for responding to request for accommodations by members of the public with disabilities.

5. Provide Reasonable Accommodation (ADA Title II – 28 CFR Part 35.140(a)) to qualified employees with disabilities. This requirement may include modifying work schedules, job restructuring, and making facilities used by employees readily accessible to an employee with a disability.

From the responses from the ADA questionnaire, there is no evidence that the City has failed to provide reasonable accommodation to its employees. Some departments wrote that there is no policy in place to provide reasonable accommodation.

IHCD recommends including appropriate inserts in materials and publications that contain general information disseminated to City's staff. We would also suggest that it be clearly included in the Personnel Policies and integrate the reasonable accommodation policy into hiring postings and procedures.

6. Provide Auxiliary aids and services (ADA Title II – 28 CFR Part 35.160) to ensure effective communication with people with disabilities. This provision requires ADA Title II entities to take steps to ensure that communication with members of the public and employees with

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disabilities is as effective as communication with others. This requirement may include but is not limited to providing sign language interpreters, providing Computer-Assisted-Real-time-Translation (CART), written materials for persons who are Deaf or have difficulty hearing, braille or large print information or information in digital format for people who are blind or have difficulty seeing.

The City lacks guidelines available to all departments. From survey responses, most departments could use clarification on their effective communication responsibilities.

The City of Everett would benefit from a written policy on Effective Communication so that staff across all departments has an understanding of their responsibility and clarity about what to do.

IHCD recommends that the City provide notices to the public, regarding the process of requesting auxiliary aids and services such as sign language interpreters and CART and include any deadlines for requesting auxiliary aids and services. We also recommend the information be available in print format as well as be available in alternate formats. This would be very important to include on the City's website.

Finally, ensure that the City's website and other web-based services are accessible to people with disabilities. It is the Department of Justice position that when services are provided on a website, those services too must be made accessible.

### III. Executive Summary of the Evaluation of Facilities

The analysis of existing conditions that encompasses the body of this evaluation is based on observations and documentation completed by IHCD team during site visits in the winter and spring of 2018. This accessibility survey included the following facilities:

- 911 Emergency Call Center\*
- Central Fire Station
- City Hall
- Connolly Center Armory
- Department of Public Works
- Ferry Street Fire Station\*
- Glenwood Cemetery
- Hancock Street Fire Station
- Health and Wellness Center
- Memorial Stadium Field House
- Parlin Library
- Police Station\*
- Recreation Center\*
- Shute Library

Outdoor Public Rights of Way were also surveyed and are included as part of each report.

\*Due to the proximity of the 911 Center, Ferry Street Fire Station, Police Station, and Recreation Center, Public Rights of Way was analyzed in a combined report with the following title:

- Elm and Ferry Streets

One Park was surveyed:

- Sacramone Park

Based on IHCD team's observation, it can be difficult to determine when a building or facility may have been renovated or altered. Therefore, IHCD's review of the City-owned facilities was based on compliance with the 2010 ADA Standards if they were not compliant with the 1991 ADA Standards.

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## Building Facilities Overview

The building facility set includes fourteen (14) City facilities and one (1) park. The accessibility survey of those facilities includes all the spaces where the City offers programs, services and activities.

It is important to remember that under Title II of the ADA the City of Everett must make sure that *“No 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 Part 35.149].

This means that all related programs, services, and activities of the City, “when viewed in its entirety, must be accessible to individuals with disabilities unless doing so results in a fundamental alteration in the nature of the program or in an undue financial and administrative burden. This requirement is known as program accessibility.” [28 CFR Part 35.150].

The City may comply with the requirements through such means as redesign or acquisition of equipment, 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 the City’s services, programs, or activities readily accessible to and usable by individuals with disabilities. A public entity is not required to make structural changes in existing facilities where other methods are effective in achieving compliance with this section.

In choosing among available methods for meeting the requirements of this section, a public entity shall give priority to those methods that offer services, programs, and activities to qualified individuals with disabilities in the most integrated setting appropriate.

In order to comply with the program accessibility obligations the City should consider:

1. Relocation of its programs, services and activities within current facility  
Often the simplest solution is for the City to use what it already has in place. IHCD strongly recommends the relocation of programs, services and activities to accessible locations within the facility.
2. Relocation of its programs, services and activities to another facility  
When not possible to relocate them within the current facility, program, services, and activities should be relocated to an accessible facility.
3. Renovation/alteration of its facilities to ensure access to programs, services and activities

The City may consider the renovation of its facilities to ensure that the programs, services and activities are offered in the most integrated seating possible.

*Note: To assist in prioritizing accessibility improvements to ensure compliance with the ADA Title II, IHCD has included a detailed catalog that supplements this ADA Self-Evaluation report. This catalog provides element-by-element, illustrated with photos, of compliance issues at each assessed facility. IHCD has been sending these catalogs in draft form to the City for review and feedback.*

IHCD assessed compliance for all building facilities on the basis of the ADA and/or state code. In each of the building facilities set there is an overview that identifies the most substantial accessibility issues and several recommendations to increase accessibility of programs, services, and activities provided by the City.

N.B.: Additional Universal Design and best practice solutions for each facility are included on the building narratives.

In addition, an overview of order of magnitude cost has been included at the end of this section. When the City presents findings and recommendations to the community and receives feedback, some recommendations may need adjustment. All capital corrective actions will need to be prioritized into a planning and budgeting document likely organized over a seven to ten year period that is called the ADA Transition Plan. Together, the ADA Self-Evaluation and ADA Transition Plan will enable the City to make substantial progress in meeting its ADA responsibilities. The recommendations for corrective action on policies and procedures of the ADA Self-Evaluation are not included in the ADA Transition Plan since that is limited to capital issues. But they are a blueprint for meeting compliance responsibilities other than capital.

To determine which buildings must be made accessible, the City should consider:

- How to provide the program in the most integrated setting appropriate;
- The locations where the activities are offered;
- Which facilities are accessible and to what extent.

#### **Key Recommendations for the Building Facilities**

- Ensure there is an accessible route from arrival points to those areas in the building where the programs, services and activities are provided.
- Ensure that accessible toilet rooms are provided in the building. Where it is technically infeasible to provide multi-user toilet rooms provide a single-user toilet room in the same area as the existing multi-user toilet rooms.

- Ensure that a sufficient number of accessible parking spaces is provided.
- Ensure that where the programs, services or activities are offered there is sufficient number of accessibility features (accessible counters, accessible work surfaces, etc.)
- If audible communication is integral to the use of the space, provide a compliant assistive listening system.

## **City Facilities**

### **911 Emergency Call Center**

The only time the public interacts with this building is when staff gives high school students a tour of the Communication Room. The front doors are locked. Given the limited set of public programs that go on within this building, it may be sufficient to provide an audiovisual recording of the control room experience and tour for people who cannot navigate stairs.

IHCD recommends the following improvements at the 911 Emergency Call Center:

- Provide offset hinges at the door to the communication room.
- Provide compliant handrails on the existing exterior stairs.

### **Central Fire Station**

The major accessibility issues at the Central Fire Station are the six-inch step leading to the main entrance and emergency exit and lack of an accessible route to programs and offices located on the second floor. Due to space considerations, safety issues and building deterioration, it makes more sense to relocate programs on the second floor to an accessible location than to install an elevator in this facility. Other accessibility issues lack of an accessible toilet room, noncompliant egress and designation signage and a service counter that is located higher than 36 inches above the finished floor.

IHCD recommends the following improvements at the Central Fire Station:

- Renovate exterior routes.
- Provide an exterior metal ramp to the entrance.
- Renovate entrance and exit doors.
- Install compliant egress and designation signage.
- Renovate one toilet room.
- Renovate the service counter.

### **City Hall**

The major accessibility issues at City Hall include entrance doors that lack a clear width of 32 inches, lack of an accessible route to the TV studio and upper tier of the Council Chambers, elevator call buttons that are located out of reach range, service counters that are located higher than 36 inches above finished floor, lack of assistive listening devices in the Council Chambers and Hearing Room, and noncompliant toilet rooms. Also of concern is the lack of drinking fountains for seated users, exterior route and parking issues, noncompliant egress and designation signage and lack of work surfaces with toe clearance. There is a lack of visible fire alarms throughout the building.

IHCD recommends the following improvements at City Hall:

- Renovate exterior routes.
- Renovate entrance.
- Address interior route issues, including providing an accessible route to the TV Studio and upper tier of the Council Chambers.
- Provide compliant door hardware and six (6) automatic door openers. Ensure that door hardware does not require tight grasping, pinching or twisting of the wrist.
- Provide compliant stair handrails.
- Ensure elevator call buttons and the emergency telephone are located within reach range, provide proper elevator signage and ensure that audible car position indicators are functioning.
- Ensure that designation, egress and directional signs are compliant.
- Provide assistive listening devices in the Council Chambers and Hearing Room.
- Renovate service counters so that a portion is no higher than 36 inches.
- Ensure work surfaces in various areas are 34 inches high and have adequate knee and toe clearance.
- Renovate toilet rooms.
- Provide compliant drinking fountains for seated users.
- Provide visual fire alarms in each room.

### **Connolly Center (Armory)**

Major accessibility issues at the Connolly Center (Armory) a noncompliant ramp and door at the accessible entrance, no accessible route to the stage in the Main Hall, and no assistive listening devices provided in the Main Hall. There is no accessible route to the second floor, but staff relocate activities to accommodate residents who cannot navigate stairs. Stair handrails are not compliant. Also, no toilet rooms in the facility have an accessible toilet compartment. Other accessibility issues include issues in multi-user toilet rooms, lack of detectable warnings at curb



ramps, lack of a van accessible parking signs and access aisle marking, lack of drinking fountains for seated users, and non-compliant service counters, dining and work surfaces.

IHCD recommends the following improvements at the Connolly Center (Armory):

- Exterior route renovations.
- Renovate the accessible entrance door and provide directional signage at the main entrance.
- Renovate emergency egress routes.
- Renovate the ramp at the accessible entrance.
- Provide compliant handrails at stairs.
- Ensure that designation and egress signs are compliant.
- Provide a service counter at the Veterans Services Office that is no higher than 36 inches.
- Provide two accessible dining/work surfaces with proper knee clearance in the Main Hall.
- Provide an accessible route to the stage in the Main Hall.
- Provide assistive listening devices in the Main Hall.
- Renovate toilet rooms on level 1.
- Provide cane protection at the standing height drinking fountain and provide a drinking fountain for seated users.

### **Department of Public Works**

Major accessibility issues at the Department of Public Works include two service counters that are located higher than 36 inches. The access route to the building from the parking lot is improperly graded and the curb ramp from the accessible parking spaces lacks a landing at the top. No van accessible space is provided in the lot and one car accessible space lacks an access aisle and has signage mounted too low. Other accessibility issues include minor issues at toilet rooms and non-compliant signage.

IHCD recommends the following improvements at the Department of Public Works:

- Renovate exterior route issues.
- Provide one van accessible space and ensure signage is mounted properly and access aisles are compliant for two car accessible spaces.
- Repair two (2) automatic door openers.
- Ensure that designation and egress signs are compliant.
- Renovate two service counters to be compliant.
- Renovate men's and women's toilet rooms.

### **Ferry Street Fire Station**

The major accessibility issues at the Ferry Street Fire Station include the lack of an accessible entrance and an accessible toilet room. Additional issues include noncompliant designation and egress signage.

IHCD recommends the following improvements at the Ferry Street Fire Station:

- Renovate the main entrance to have a threshold no greater than ½ inch high.
- Enlarge the door to the toilet room to have 32 inches clear minimum.
- Rebuild the single user toilet room to be compliant.
- Ensure that designation signs are compliant.

### **Glenwood Cemetery**

Accessibility issues at Glenwood Cemetery lack of a van accessible parking space and change in level greater than ¼-inch at exterior routes. The toilet room has a 5-inch step to it and the lavatory lacks toe and knee clearance and has exposed plumbing. The flush control is not located on the open (transfer) side of the toilet and no grab bars are provided. Additional issues include lack of designation signage the toilet room and lack of benches on accessible routes with clear floor space located alongside them.

IHCD recommends the following improvements at Glenwood Cemetery:

- Renovate exterior accessible routes, including the ramp to the toilet room.
- Provide one van accessible space, access aisle, and signage.
- Toilet room renovations.
- Provide accessible routes, clear space, and shoulder alignment at benches.
- Provide compliant designation signage.

### **Hancock Street Fire Station**

The major accessibility issues at Hancock Street Fire Station include a 3-inch step at the main entrance, a deteriorated walkway to the main entrance, a service counter that is located higher than 36 inches above finished floor and lack of an accessible toilet room. Other accessibility issues include noncompliant designation signage and curb ramps.

IHCD recommends the following improvements at Hancock Street Fire Station:

- Renovate sidewalks and curb ramps.
- Providing a 5-ft by 5-ft concrete landing and ramp, along with an automatic door opener at the main entrance.
- Bring toilet room into compliance.

- Renovate exterior walkway.
- Provide compliant designation signage.
- Provide a service counter with a compliant portion that is no higher than 36 inches above finished floor.

### **Health and Wellness Center**

Major accessibility issues at the Health and Wellness Center include excessive cross slopes and level changes at exterior routes, lack of maneuvering clearance at three doors, damage to the ramp at the main entrance, and a service counter that is located higher than 36 inches above the finished floor. Toilet rooms and locker rooms have minor accessibility issues. Designation and egress signage is not compliant. Other accessibility issues include handrails that are not continuous at one egress stair, non-compliant accessible parking and lack of an accessible parking space on the block.

IHCD recommends the following improvements at the Health and Wellness Center:

- Renovate pedestrian access routes and curb ramps.
- Renovate existing accessible parking space on Maple Ave and provide an accessible space on Broadway.
- Provide three (3) automatic door openers.
- Provide compliant egress, designation, directional signage.
- Renovate toilet rooms.
- Renovate service counter.
- Repair ramp at entrance.
- Provide accessible locker room benches and an accessible locker.
- Provide a continuous handrail on the stair by the fire exit by the Gym Toilet Rooms.

### **Memorial Stadium Field House**

The major accessibility issues at the Memorial Stadium Field House include no accessible entrances into the building, no accessible route between the building and the Stadium and no accessible route between the first floor and basement. Neither toilet room has a wheelchair accessible toilet compartment; urinals are mounted higher than 17 inches above finished floor. No accessible lockers or benches are provided inside locker rooms. Additional issues include noncompliant egress and designation signage throughout the building, door hardware that is not operable with a closed fist, noncompliant stair handrails, and exterior routes with excessive changes in level and excessive cross slopes.

IHCD recommends the following improvements at the Memorial Stadium Field House:

- Correct curb ramps and exterior routes.
- Renovate main entrance, including building a landing, pressure treated wood ramp and pressure treated wood stairs.
- Provide a Limited Use Limited Access (LULA) lift.
- Provide compliant door hardware
- Provide compliant egress and designation signage.
- Provide compliant stair handrails.
- Renovate toilet rooms.
- Provide five (5) accessible lockers and two (2) accessible locker room benches.
- Provide audible and visible fire alarms in rooms.

### **Parlin Library**

The major accessibility issues at Parlin Library include lack of visible and audible car position indicators in the elevator, lack of accessible work surfaces, no directional signage provided at the inaccessible entrance, a service counter with no portion located at 36 inches or lower on the upper level, and no drinking fountain provided for seated users. Toilet rooms have accessibility issues including noncompliant grab bars, toilet paper dispensers mounted over grab bars, flush controls not mounted on the open (transfer) side and lack of audible and visible alarms. Additional issues include noncompliant egress signage, noncompliant stair handrails, and curb ramps lacking detectable warnings. Street parking space does not adjoin an accessible route and it is allocated as a bus route at certain times of the day.

IHCD recommends the following improvements at Parlin Library:

- Renovate exterior routes, including sidewalks and curb ramps.
- Relocate accessible street parking space.
- Provide compliant directional and egress signage.
- Provide an accessible service counter on the upper level.
- Provide six (6) accessible work surfaces.
- Install audible and visible car position indicators.
- Renovate four (4) toilet rooms.
- Raise drinking fountain to provide knee clearance.
- Renovate stair handrails to be located between 34 and 38 inches with proper extensions.

### **Police Station**

The major accessibility issues at the Police Station include the lack of accessible cells for men, women and juveniles. In addition, some doors lack a clear width of 32 inches, one lacks maneuvering clearance, and some lack compliant hardware. Many toilet rooms have severe

accessibility barriers and lack a dimensionally compliant wheelchair accessible compartment. Three service counters lack compliant portions that are no higher than 36 inches above the floor. Exterior routes have excessive cross slopes and changes in level. Additional issues include noncompliant stair handrails, noncompliant elevator, egress and designation signage and lack of a compliant drinking fountain for seated and standing users on level 2.

IHCD recommends the following improvements at the Police Station:

- Renovate exterior access routes.
- Renovate doors to have 32 inches of clear width, adequate maneuvering clearance and hardware that is operable with a closed fist.
- Renovate stair handrails.
- Provide compliant egress and designation signage.
- Renovate three (3) service counters.
- Provide one accessible cell for men, women and juveniles (3 total) with accessible lav/toilets and ligature resistant grab bars.
- Renovate toilet rooms.
- Install a hi-lo drinking fountain on level 2.
- Provide tactile stars at the main level on the elevator control panel and hoistway signs.

### **Recreation Center**

The major accessibility issues at the Recreation Center include a temporary ramp to the entrance that is not in operable working condition, an inaccessible service counter, toilet rooms that lack accessible toilet compartments and no accessible shower facilities are provided. In addition, exterior stairs and ramps lack handrails, compliant egress and designation signage is not provided, and many doors have excessive thresholds or hardware that is not operable with a closed fist.

IHCD recommends the following improvements at the Recreation Center:

- Repair the automatic door opener at the main entrance.
- Provide a new pressure treated wood ramp from Elm Street.
- Provide handrails on stair from Elm Street.
- Provide compliant egress and designation signage.
- Lower service window to 36 inches max.
- Renovate toilet and shower rooms.
- Provide handrails on both sides of ramp at southern exit.
- Renovate door thresholds and ensure doors have hardware that can be operable with a closed fist.

### **Shute Library**

Major accessibility issues at Shute Library include work surfaces that lack toe or knee clearance or are located higher than 34 inches above finish floor and lack of assistive listening devices in the meeting room. Minor issues occur with exterior routes, toilet rooms, egress and designation signage, door maneuvering clearance, drinking fountains and protruding objects.

IHCD recommends the following improvements at Shute Library:

- Renovate exterior routes including three (3) curb ramps.
- Provide work surfaces with 34 inches to the top and knee and toe clearance.
- Provide an automatic door opener at one toilet room.
- Provide an assistive listening system in the meeting room.
- Renovate drinking fountains for standing users and ensure drinking fountains for seated users have knee and toe clearance.
- Provide a compliant sink in the children's room.
- Provide compliant egress signage.
- Provide handrails on both sides of the east vestibule exit by 107.

### **Elm and Ferry Streets**

Elm and Ferry Streets were looked at as part of the Public Rights of Way around the 911 Call Center, the Ferry Street Fire Station, the Police Station and the Recreation Center. The major accessibility issues at Elm and Ferry Streets include lack of detectable warnings at key intersections, excessive slopes at curb ramps and curb ramp landings, and curb ramps with changes in level up to 3 inches. The Fire Station Memorial is not accessible due to a step and most of the sidewalk has an excessive cross slope.

IHCD recommends the following improvements at Elm and Ferry Streets:

- Provide an accessible route to the memorial.
- Regrade parts of the sidewalk.
- Repair curb ramps and provide detectable warnings.
- Provide clear floor space at the pedestrian signal by the skating rink.

### **Sacramone Park**

Sacramone Park is currently being renovated. From the condition of the sports fields, accessible routes, playground, splash deck and basketball court, it is clear that the City is making a great effort toward creating an accessible space.

However IHCD recommends the following improvements at Sacramone Park:

- Renovate curb ramps.
- Renovate doors and gates (including providing solid surfaces and maneuvering clearance).
- Provide directional signage at inaccessible entrances.
- Provide a 36" high service counter.
- Provide an accessible space at each team seating area.
- Provide accessible spaces at bleachers.