

# Village of Bellows Falls/ Town of Rockingham

Town Hall, Public Library, Public Safety Building



## Accessibility Evaluation

Prepared by

Vermont Accessible Environments

Sheldon, VT 05483

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## Village of Bellows Falls/Town of Rockingham Evaluation

Vermont Accessible Environments has conducted a full accessibility assessment of the town hall, public library, and public safety building of the Village of Bellows Falls/Town of Rockingham, as required by the Pre-Determination Conciliation Agreement HRC Case PA14—0002, Vermont Human Rights Commission.

This accessibility assessment is based on the Americans with Disabilities Act of 1990, Title II regulations at 28 CFR 35.151 and 35.150 (c) and (d), and is conducted using the 2010 Standards for Accessible Design, the 2012 Vermont Access Rules and the Uniform Federal Accessibility Standards (UFAS). The following narrative report identifies areas deemed to be in conflict with prevailing accessibility standards, and suggests possible corrective steps or actions to remove barriers to accessibility.

### **An overview**

It's important to note that nearly 54 million people in this country live with a disabling condition. More than 96,000 Vermonters live with disabilities they characterize as severe.

The *Americans with Disabilities Act of 1990 (ADA)* is landmark civil rights legislation to prohibit discrimination in employment, ensure access to services of state and local authorities, and equal access to places of public accommodations. While the ADA governs "all interior and exterior spaces that are made available to the general public", many properties such as churches and historic buildings have been granted certain statutory latitude in meeting this standard. Buildings constructed before 1992 are not required to conform to the ADA 2010 Standards of Accessible Design unless altered. Nonetheless, "readily achievable barrier removal" is required to minimize the impact of old architecture and building practices on people with mobility impairments.

Historic structures, particularly, have no obligation to make modifications which may be deemed "destructive of the fundamental historic function or character" of the building. [See 2010 Standards of Accessible design, §202.5 (exception)] That latitude, however, doesn't absolve such entities of the responsibility to provide essentially equivalent services and access to programs.

The responsibilities of State and local governments under the ADA are heavier than those borne by private enterprise. Title II of the ADA [28CFR35.103] establishes the standards for state and local facilities and programs, requiring that all programs, services and activities are accessible. If structural impediments cannot be removed, the same programs, activities, services, advantages and privileges must be provided by alternate means in the most integrated settings possible. A rare exception may apply, if modifying a policy, program or activity would "fundamentally alter the service, activity or program" [35.130(b)(7)]

Each municipality must conduct an accessibility evaluation of its infrastructure. Periodic reviews of facilities and policies are needed to monitor continuing accessibility as programs, personnel, and facilities change over time.

While the Americans with Disabilities Act is often characterized in terms of mobility, the Act recognizes and embraces all disabling conditions. It's important to consider hearing, vision, and intellectual disabilities when imagining a "barrier free" community. This exercise takes us far beyond "the ramp", and may encounter difficult attitudes, stereotypes, indifference, passivity and, occasionally, overt hostility.

Advocates note correctly that, while perhaps rising out of a fundamental medical issue, the real impact of disability is largely a social phenomenon best dealt with by helping people with disabilities lead independent, socially and culturally enriched lives. While the range of disabling conditions is broad, our municipal institutions must model inclusive attitudes and embrace the challenges faced and met every day by people with disabilities.

The ADA expresses the intent of Congress to remove architectural and programmatic barriers to the enjoyment of, and participation in, the normal activities of daily living in our society. This is to be accomplished through “readily achievable” and “reasonable” actions.

The U.S. Access Board, working with the earlier *Architectural Barriers Act* and the *Rehabilitation Act of 1973*, develop and review guidelines against which compliance with that intention is measured. These guidelines, known earlier as the ADA Accessibility Guidelines (now the 2010 Standards for Accessible Design), are the core of the Department of Justice Code of Federal Regulations (28CFR35 and 36, ff).

Scoping for the 2010 Standards differs between Title II (state and local government facilities), on the one hand, and Title III “places of public accommodation”, or private businesses serving the public, on the other. The technical standards, specifying physical characteristics of an accessible environment, are generally the same for both.

From those standards, the Department of Justice has distilled four priorities: 1) an accessible route and entry to the building; 2) access to the expected services and programs; 3) access to restrooms; 4) access to other aspects of the site or programs. This is the prism through which the following survey is conducted.

We appreciate the opportunity to share these thoughts with you. Please understand that we are not responsible for the enforcement of the provisions of the ADA. The information, materials and/or technical assistance are intended solely for informal guidance, and are neither a determination of your legal rights or your responsibilities under the ADA, nor binding on any agency with enforcement responsibility under the Act.

The survey is conducted using the Department of Justice 2010 ADA Standards for Accessible Design. Text boxes which appear throughout the following document are excerpted from the 2010 Standards for Accessible Design. The *2010 Checklist for Readily Achievable Barrier Removal*, a template developed by the Institute for Human Centered Design under agreement with the US Access Board, and the 2012 Vermont Access Rules are also referenced.

## The Rockingham Town Hall

The Rockingham Town Hall is a large, downtown, multilevel brick structure of three stories including a finished and occupied basement. Owned by the Town of Rockingham, the building houses municipal offices, the Opera House Theater, as well as two commercial storefronts.

Landlord and tenants share responsibility to review aspects of their buildings, programs and practices for accessibility in their respective domains.

**§36.201(b) Landlord and tenant responsibilities.** Both the landlord who owns the building that houses a place of public accommodation and the tenant who owns or operates the place of public accommodation are public accommodations subject to the requirements of this part. As between the parties, allocation of responsibility for complying with the obligations of this part may be determined by lease or other contract.

The Town of Rockingham intends to maximize accessibility while preserving the historical integrity and functional character of the Town Hall. Many accessible features have been introduced in these spaces since the ADA's effective date of January, 1992. Areas or elements which were made compliant with the 1991 accessibility standard are considered compliant under the present (2010 ) standard of accessible design *until alterations are undertaken*, at which time the current standard must be met. Areas which were not previously made compliant with the earlier standard, and any alterations begun after March 15, 2012, must now be made compliant with the 2010 Standards for Accessible Design.

Earlier modifications include an accessible entrance, vertical access to each level, access to the raised stage and designated accessible aisle seating in the theater/town meeting space, and nominally accessible restrooms on two levels. Several challenges remain to be addressed, among which are door width, door closing speed, non-compliant handrails, signage, certain restroom features, and non-compliant door operating hardware. These represent opportunities for "readily achievable barrier removal", and should be addressed in the course of regular building maintenance.

A significant issue, given the highest priority in the HRC Pre-determination Conciliation Agreement, is the condition of the accessible route to the accessible entrance. The Town Hall building adjoins a private alley, shared with the neighboring bank building. The property line is described as running parallel to and eight feet from the wall of the bank.

**206.2.1 Site Arrival Points.** At least one *accessible* route shall be provided within the *site* from *accessible* parking spaces and *accessible* passenger loading zones; public streets and sidewalks; and public transportation stops to the *accessible building or facility entrance* they serve.

**206.2.4 Spaces and Elements.** At least one *accessible* route shall connect *accessible building or facility entrances* with all *accessible spaces and elements* within the *building or facility* which are otherwise connected by a *circulation path*

## Accessing the site: parking

There is no on-site public parking at the Rockingham Town Hall. Public parking is available in a small lot north of the downtown square, in on-street parking available immediately in front of the Rockingham Town Hall, and on both sides of the downtown square in striped angle parking.

Accessible on-street parking is not a first concern if off-street accessible parking is available within a reasonable distance on an accessible route. Off street parking is often considered safer.

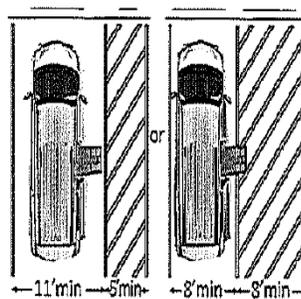
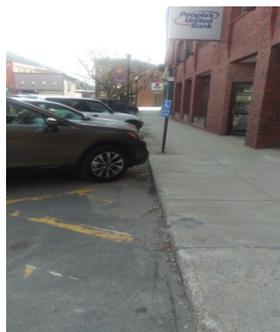
One angled parking space is designated “accessible” with low signage (40”) on the south side of the alley already mentioned, and another is directly across the square.

A sign, mounted 60” above the road surface (so that it can’t be obstructed by a parked vehicle—or snow banks) should identify accessible parking, and bear the universal symbol of accessibility. (The use of pejorative qualifiers, such as “handicap” or “disabled” is considered in poor taste and offensive. A sign indicating “reserved” or “accessible” parking, and bearing the universal symbol of accessibility, is preferred.)

No striped *access aisle* serves either of these designated accessible spaces.

While reserved parking which *doesn't* include an access aisle may serve the special needs of some people with disabilities, it is not considered accessible. An access aisle is needed to provide safe space to transfer in or out of a vehicle, and to allow the idiosyncratic maneuvering necessary with a mobility device. “Van accessible” parking requires an even wider access aisle, since deploying a lift gate or ramp adds significantly to the space needed for this maneuver.

The present signed space, nearest the accessible Town Hall entrance, includes a triangular access aisle 12’ wide at the base, and 14’ deep perpendicular to the sidewalk. An access aisle must be a minimum of 60” wide along the full depth of the accessible parking space (for a passenger car) or 96” wide for a “van accessible” space. When accessible parking is provided, one accessible space in six (but at least one space) must be van accessible.



The parking space designated as accessible must be functionally level (with a slope or cross slope no greater than 1:48), with a surface that is “firm, stable, and slip-resistant”

**403 Walking Surfaces 403.1 General.** Walking surfaces that are a part of an *accessible* route shall comply with 403.

**403.2 Floor or Ground Surface.** Floor or ground surfaces shall comply with 302.

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

**303.2 Vertical.** Changes in level of ¼ inch high maximum shall be permitted to be vertical.

**403.3 Slope.** The *cross slope* of walking surfaces shall not be steeper than 1:48.

A compliant access aisle serving this designated accessible space will intrude into the mouth of the alley, which is an active, albeit limited, path of vehicular traffic. An access aisle may not overlap a path of vehicular traffic.

In this instance, the necessary access aisle at the designated accessible angle parking space can be created by designating the adjacent parking space the accessible space, and striping the present space as the access aisle. In a designated van-accessible space, the access aisle should be on the passenger side.

When an accessible route must cross a path of vehicle travel, it must be striped as a crosswalk.

It may also be defensible to stripe the mouth of the alley as a crosswalk, thereby creating the required access aisle at the present signed accessible space. However, this may represent a liability the Town is unwise to incur. A review by the Vermont Access Board would determine if this would be sufficient and acceptable.

The access aisle must be contiguous with an accessible route, with the same “firm, stable, slip resistant” surface characteristics.

**The accessible route:**

The accessible route, in this case, refers to the shortest path connecting the accessible entrance to the “site arrival point”: variously understood to be an accessible parking space, a drop-off/ loading zone, or a municipal sidewalk to the site.

The route to the accessible entrance is along the shared alley, which doesn’t distinguish pedestrian and vehicle travel paths. The alley surface at present is badly degraded, including broken asphalt, potholes and loose gravel, irregular changes in level, and a storm drain with non-compliant grate openings.

**302.3 Openings.** Openings in floor or ground surfaces shall not allow passage of a sphere more than ½ inch diameter.  
Elongated openings shall be placed so that the long dimension is perpendicular to the dominant direction of travel.

Rockingham proposes a utility infrastructure upgrade beneath the shared alley, providing an opportunity to resurface the accessible route: removing existing hazards, and striping to designate discrete pedestrian and vehicle travel paths. The Standards

permit using a vehicular route as part of an accessible route. Striping the whole alley, as far as the accessible entrance, might be a wise precaution.

Other aspects of pedestrian access to the Town Hall, such as an inventory of sidewalk conditions, curb cuts and street crossings, are beyond the scope of this evaluation but must be a recurring task of the Department of Public Works.

**The accessible entrance:**



The apparent main entrance to the building includes irregular granite steps and is not accessible. When the main entrance is not the accessible entrance, a sign must be posted directing a user to the nearest accessible entrance. While a paper sign at this entrance indicates the route to the accessible entrance, a permanent sign is required.

**Signs**

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

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

**216.3 Directional and Informational Signs.** Signs that provide direction to or information about interior *spaces* and *facilities* of the *site* shall comply with 703.5.

**703.1 General.** Signs shall comply with 703. Where both visual and *tactile characters* are required, either one sign with both visual and *tactile characters*, or two separate signs, one with visual, and one with *tactile characters*, shall be provided.

A sign indicating the presence of an elevator is suspended in the alley above the entrance to the elevator lobby. This sign is visible from the street. However, it does not identify this as the accessible entrance, nor does it include the universal symbol of accessibility.

Objects suspended below 80" high in a travel path may not protrude more than 4 inches into that path.

**307.2 Protrusion Limits.** Objects with leading edges more than 27 inches and not more than 80 inches above the finish floor or ground shall protrude 4 inches maximum horizontally into the *circulation path*.

The glassed entrance is equipped with an automatic door opener. The threshold at this door is higher than the ¼" maximum vertical change in elevation allowed without a bevel, sloped no steeper than 1:2. Work proposed to resurface the alley must address the transition at this threshold. A maximum total height of ¾" is permitted at thresholds in existing buildings.

Two elevators represent either limited access to the lower level, locked out except during scheduled public meeting times; or access to three upper levels which are available during regular office hours or during theater events. When an interior circulation path is provided in a municipal facility of two or more levels, an accessible route must be provided as well.

**206.2.3 Multi-Story Buildings and Facilities.** At least one *accessible* route shall connect each *story* and *mezzanine* in multi-story buildings and facilities.

**206.2.4 Spaces and Elements.** At least one *accessible* route shall connect *accessible building or facility entrances* with all *accessible spaces and elements* within the *building or facility* which are otherwise connected by a *circulation path* unless exempted by 206.2.3 Exceptions 1 through 7.

Informational signage is posted on the wall at each elevator. Building directories need not include Braille or tactile characters. However, informational signage (providing direction to or information about offices or interior spaces) must be posted with appropriate character size, height, and contrast. Signage should clarify the services provided at the several levels, and identify an accessible route.

Signs at permanent offices or rooms must be accessible: including Braille and tactile characters, contrasting with their background, and mounted at a height 60" above the finished floor measured to the center of the sign (if installed before 3/15/2012).

When new signage is developed and placed consistent with the current standard, preexisting signage should be relocated to maintain consistency in signage throughout the interior spaces.

#### **Accessing interior public spaces:**

Administrative offices are located on the second and third floors. The first floor is committed entirely to the theater, which is available for municipal assembly, especially at Town Meeting.

The theater estimates a capacity of 551, of which 370 are accommodated on the main, raked floor. The balcony is inaccessible, and a complex of successive up- and down-stair flights and the steeply stepped balcony itself make it infeasible to develop an accessible route to this level. The raked floor, on the other hand, provides a range of excellent potential sight lines and viewing elevations, such that the balcony cannot be said to provide a superior user experience.

At present clustered, supposed wheelchair seating is provided in a level "bullpen" at the back of the auditorium. This is a trapezoidal platform, 15' long, walled off from the general circulation path by a 41" half-wall behind. Entered only from one end, access by more than one or two wheelchairs is impractical and unsafe. No comparable companion seating is provided, although several padded steel "waiting room" chairs are evident in this space.

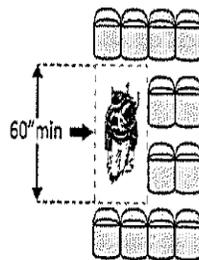


When wheelchairs are isolated in a remote location at the rear of the assembly area, individuals are effectively singled out for their disability. Clustering wheelchair spaces in an island of isolation is considered disrespectful: ideally (and certainly in new construction) wheelchair spaces will be distributed to permit some of the range of choice afforded to others in terms of proximity to the speaker and line of sight [§802.2].

Accessible wheelchair seating takes into consideration the companions of those attending using wheelchairs. Companion seating should adjoin wheelchair spaces, with the same shoulder-to-shoulder alignment enjoyed by other visitors. Companion seating should be of a similar character or degree of comfort as the general seating offered [§802.3].

To meet the standard for wheelchair seating in assembly areas, a hall with an aggregate of 551 seats should have 7 wheelchair spaces [§221.2.1.1]. Clear space for wheelchair seating requires a minimum of 48" x 36" for a front or rear approach; or 60" x 36" for a side approach [§802.1.2; 802.1.3; 802.1.4]. Removing, or creating additional openings in the wall behind the present, supposed wheelchair spaces would permit a maximum of three wheelchair spaces with companion seats.

Two front row spaces, one at each end of the center section, appear to be wheelchair specific: that is, each end chair in the row is missing. The floor here is not functionally level (sloping less than 1:48 in both directions), and if leveled by low wedged platforms here a trip hazard may be created. Similarly, the companion seats adjoining these present, presumptive wheelchair spaces can't be "shoulder aligned" unless the wheelchairs are so close to the seats behind as to render those seats unusable. Creating wheelchair seating at the very front, on the level "orchestra" floor, disadvantages the viewer by limiting the line of sight.



To achieve the required 36"x60" footprint for a wheelchair space elsewhere in the raked seating array could involve the displacement of at least 4 seats for each wheelchair space. It can be argued that the loss of so many seats could have a significant economic impact on theater operations. Still, seats in these designated spaces can be engineered for quick removal or replacement as needed. Staff training, then becomes key for identifying and accommodating any imminent, yet temporary need.

Similarly, a level platform for such seats would need to extend into the aisle to facilitate maneuvering into the created wheelchair space. The resulting step at the downsloping edge of this platform would be a potential trip hazard, and would unacceptably limit wheelchair accessible route to the elevator serving the stage.

Appropriate, distributed seating can also be created by removing sections of the 41" high wall behind the last row of center-aisle seats. This may fairly be considered the best option, even though the effect is to consign nearly all citizens who use wheelchairs to the back of the theater. When altered in the future, the theater must include appropriate and accessible distributed seating.

In addition, "designated accessible aisle seating", or aisle seats with removable armrests, is required at 5% of aisle seats [§802.4]. The theater has configured 6 aisle seats with removable armrests among a total of 48 aisle seats, exceeding the standard.

### **Accessible restrooms**

Public restrooms are provided at the back of the auditorium.

While the men's room is generally accessible, certain features are identified as inaccessible, including the urinal, the rim of which is mounted 24" above the finish floor. The maximum allowable height is 17" aff. Controls may be no higher than 44", unless automatic. The lowest edge of the reflective surface of the mirror is slightly higher than the allowed maximum (40" aff), at nearly 41".

The women's restroom presents a similar, noncompliant mirror height. Other issues in this room include the coat hook in the accessible toilet compartment, which is inaccessible at 64". The maximum reach range is 48": a second, lower hook may be added or this hook should be lowered.

The paper towel dispenser is too high by current (2010) standards, at 52" (55" to the control knob, the reach of which is required if the towel fails to advance automatically). The earlier standard for maximum reach range, 54", prevailed at the time these restrooms were last altered (before 3/15/2012). When features comply with the earlier standard, they need not be reset to current standards. However, when altered, those features must meet the then-current standard.

The same style of towel dispenser is used throughout the Town Hall. The manual control is a flattened knob, which cannot be operated "without a tight grasping, pinching, or twisting of the wrist", and is not accessible. Additionally, the depth of the dispenser is 9", which, when located on the wall adjacent to a lavatory, creates a protruding object in the 30"x48" clear spaces required at the sinks. A source of paper towels should be provided at accessible sinks until an alternate, accessible style of dispenser is chosen.

In the toilet compartment, grab bars require a minimum of 3" clearance beneath and 12" above the bar: in this instance, the paper dispenser obstructs the required clearance below the grab bar and should be moved.

## Access to the stage



Presenters may access the stage by either of two sets of portable steps directly in front of the stage, or by a LULA vertical lift to the right of the stage. The doorway leading to the LULA allows a clear opening of 31": however, 32" is the minimum required clear opening in doorways. Clear opening is the narrowest distance measured from the door jamb on the latch side to the face of the door on the hinge side, when open 90°. In this case, additional clearance can be obtained by replacing the standard butt hinge with an offset hinge, which effectively increases the clear opening by the thickness of the door.

The LULA lift also provides access to a "green room" dressing room and accessible restroom one floor below.



Three dressing rooms are not accessible, due to original, narrow (27 ½" wide) doors, and coat hooks/hangers mounted 68" above the floor. Widening at least one of the three dressing room doors, and lowering the hooks, would be considered readily achievable: that is, achievable without an undue financial or administrative burden.

The unisex, single-user restroom includes inaccessible features as well: the paper towel dispenser is set at 52" aff and should be lowered. The grab bar is set at 37 ½" to the top of the bar: the standard defines the measure to the top of the bar, not the center. The grab bar on the adjacent wall is only 36" long, while 42" is required by the standard.

The geometry of this room, which includes a jog in the adjacent wall, limits the length: the longest grab bar possible has been installed, and in our opinion meets the standard "to the maximum extent feasible".

**The Women’s Club**

A large meeting space in the basement level under the theater is identified as the Women’s Club, and serves as a usual meeting place for various town Boards. This space is accessed primarily by flight of stairs from an alley entrance, or by a LULA vertical lift entered from the same elevator lobby serving the upper administrative levels.

The space is set up, ad hoc, to serve the particular needs of groups meeting here. A large conference table is available for board use, although the table has no knee clearance for a participant using a wheelchair. Such a participant would expect knee clearance under the table of at least 27”.

**305.4 Knee and Toe Clearance.** Unless otherwise specified, clear floor or ground space shall be permitted to include knee and toe clearance complying with 306.  
**306.3.1 General.** Space under an *element* between 9 inches and 27 inches above the finish floor or ground shall be considered knee clearance

The existing valence or skirt of the table can be modified to create an accessible “seat at the table”; or an extension can be devised to create an inclusive place for at least 1 wheelchair.

An accessible unisex restroom serves this level, adjoining the Women’s Club meeting hall. Additional, gender specific restrooms are located up a half flight from this level, and need not be accessible.

**Assistive listening devices**

**Assistive Listening Systems**  
**219.2 Required Systems.** In each *assembly area* where audible communication is integral to the use of the *space*, an *assistive listening system* shall be provided.  
**219.3 Receivers.** Receivers complying with 706.2 shall be provided for *assistive listening systems* in each *assembly area* in accordance with Table 219.3. Twenty-five percent minimum of receivers provided, but no fewer than two, shall be hearing-aid compatible in accordance with 706.3.

Sound systems are provided in the theater and in the Women’s Club meeting space. A public address system as such isn’t an assistive listening system, although it may be part of such a system. Individual receivers, some of which are compatible with hearing aids, must be provided.

The number of assistive listening receivers required in a public entity are represented in a table devised by the US Access Board:

**Table 219.3 Receivers for Assistive Listening Systems**

Capacity of Seating in Assembly Area	Minimum Number of Required Receivers	Required to be Hearing-aid Compatible
501 to 1000	20, plus 1 per 33 seats over 500 seats	1 per 4 receivers

The occupancy of all assembly areas in a facility are combined to determine the appropriate number of devices, and of those how many must be hearing aid compatible. In this case, where the estimated combined occupancy of the assembly areas is 670, 26 receivers will be available, and at least 25%, or 7 receivers, will be hearing aid compatible.

If the assistive listening system chosen is of the *induction loop* type, then all receivers are understood to be hearing aid compatible.

Signage including the universal symbol of hearing accessibility must be displayed near each point of entry to an assembly area.

**703.7.2.4 Assistive Listening Systems.** *Assistive listening systems* shall be identified by the International Symbol of Access for Hearing Loss complying with Figure 703.7.2.4.

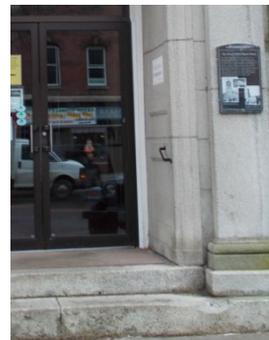


Town staff or volunteers serving the assembly areas must be trained to identify, locate, and distribute (and retrieve) the assistive listening devices. The receivers are not inexpensive, and a policy governing their distribution and recovery should be established. (it's not uncommon to require a deposit -such as a license- to insure the return of the device).

Training procedures will be needed for staff and volunteers to maintain the devices: clean, charged, and ready for use. Devices should be readily available near points of entry.

### Municipal Offices

Second floor offices are accessed by the cab elevator already mentioned, or by flights of stairs rising from the street and theater lobby. Stairs are never part of an accessible route; however, when stairs are part of an emergency egress they must be accessible. That is, they must include uniform riser height and tread depth, and be equipped with handrails on both sides of the stairs. In this case, handrails are not accessible insofar as the handrails are not of an accessible profile, continuous on the inside turn at landings, do not extend, level with the landing, beyond the top and bottom of the stairs, and are not uniform in height, 34-38" above the stairs measured vertically at the landing or the nose of the tread.



Historical buildings are given certain latitude in applying the Standards for Accessible Design, and are not required to make alterations that would fundamentally alter or destroy the historic character of a building or its unique features. Consulting the Division of Historic Preservation will provide clarity about alterations which may be contraindicated in your historic building.

Ordinarily, adding a second handrail of an accessible grip profile at a compliant height or adding extensions for continuity would not be understood as destructive.

## Stairways

**504.6 Handrails.** Stairs shall have handrails complying with 505.

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

**505.3 Continuity.** Handrails shall be continuous within the full length of each stair flight or *ramp* run. Inside handrails on switchback or dogleg stairs and *ramps* shall be continuous between flights or runs.

**505.4 Height.** Top of gripping surfaces of handrails shall be 34 inches minimum and 38 inches maximum vertically above walking surfaces, stair nosings, and *ramp* surfaces. Handrails shall be at a consistent height above walking surfaces, stair nosings, and *ramp* surfaces.

**505.5 Clearance.** Clearance between handrail gripping surfaces and adjacent surfaces shall be 1½ inches minimum

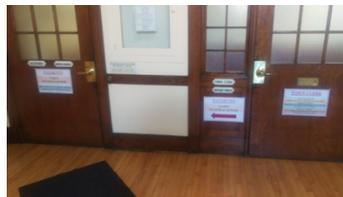
**505.7.1 Circular Cross Section.** Handrail gripping surfaces with a circular cross section shall have an outside diameter of 1¼ inches minimum and 2 inches maximum.

**505.7.2 Non-Circular Cross Sections.** Handrail gripping surfaces with a non-circular cross section shall have a perimeter dimension of 4 inches minimum and 6¼ inches maximum, and a cross-section dimension of 2¼ inches maximum.

**505.10.2 Top Extension at Stairs.** At the top of a stair flight, handrails shall extend horizontally above the landing for 12 inches minimum beginning directly above the first riser nosing. Extensions shall return to a wall, guard, or the landing surface, or shall be continuous to the handrail of an adjacent stair flight.

**505.10.3 Bottom Extension at Stairs.** At the bottom of a stair flight, handrails shall extend at the slope of the stair flight for a horizontal distance at least equal to one tread depth beyond the last riser nosing. Extension shall return to a wall, guard, or the landing surface, or shall be continuous to the handrail of an adjacent stair flight.

The second floor lobby floor is an accessible hardwood surface: firm, stable and slip resistant. A rubberized weather mat was on the floor at the time of our visit. Carpets and rugs must be of a type with low loop pile, not higher than ½" and be secured at the edges to reduce a potential trip hazard. Weather mats of this type have tapered edges, lay flat, and are generally not considered a trip hazard. However, care must be taken to prevent edges curling or wrinkles developing.



Doors to the Town Clerk and to other municipal offices are identified with non-compliant signage in the second floor lobby. Signage on permanent rooms should be mounted on the wall adjacent to the latch side of the door. Such signs include tactile

and Braille characters, and, when conforming with the 1991 standard are mounted 60" to the center of the sign, with character size, contrast and height as indicated in §703ff, above. New signage, installed after 3/15/2012, meets a different height standard.

## **Signs**

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

**216.3 Directional and Informational Signs.** Signs that provide direction to or information about interior *spaces* and *facilities* of the *site* shall comply with 703.5.

**703.1 General.** Signs shall comply with 703. Where both visual and *tactile characters* are required, either one sign with both visual and *tactile characters*, or two separate signs, one with visual, and one with *tactile characters*, shall be provided.

**703.4.1 Height Above Finish Floor or Ground.** *Tactile characters* on signs shall be located 48 inches minimum above the finish floor or ground surface, measured from the baseline of the lowest *tactile character* and 60 inches maximum above the finish floor or ground surface, measured from the baseline of the highest *tactile character*.

A primary goal of regularizing sign location, height, contrast and content is especially to facilitate effective communication with those visitors with low vision. Predictable location of signs matters. Mounting signs on outswinging doors is dangerous for those who must approach very close to see or touch the sign.

The doors here include original architectural elements which feature multipane glass windows in and beside the doors. Mounting accessible signs on or across the glass panes next to the Town Clerk's door appears possible. However, a hinged glass cabinet occupies the wall adjacent to the latch side of the Manager's door. It's our opinion that if this glass door is not an active access panel for essential building services, the surface could be used to mount the Town Manager's sign at an accessible height.

### **The Town Clerk's office**

Typical services provided by the Town Clerk are often handled at the service counter. The counter here is 43" high, which is not accessible for a seated user.

Service counters must provide a section low enough for a seated user to sign documents, write a check, or review materials. This accessible section must extend the full depth of the counter, be no higher than 36 inches, and must be at least 36 inches long for a parallel (side) approach. [§904.4.1] If a forward approach is chosen, the accessible segment of the service counter may be 36" high and 30" long. When a forward approach is provided, a clear space of 30" wide x 48" deep is needed perpendicular to the counter, with at least 27" knee clearance under the counter [§306.3.2].

Where this is determined to be infeasible, a similar surface for seated visitors may be provided nearby at a table of appropriate height. An accessible route (at least 36" wide) must connect the office entrance with an accessible visitor work surface.

In the Rockingham Town Clerk's office, public workspace is provided at two large tables beyond the service counter. Where non-employee work spaces are provided, 5% or at least one must be accessible. Accessible tables are no higher than 34", and have at least 27" knee clearance beneath. A clear floor space, 30"x 48" is required for a forward approach to the table

The existing work tables have only 24" knee clearance for seated users. This impediment can be addressed by raising the table with 3" leg extensions (mindful of the 34" maximum height) or by removing a section of the table skirt or valence at least 30" wide, if structurally possible, to create the 27" high knee clearance.

Access to the vault is facilitated by personal attention from the Town Clerk or an assistant. The vault door is narrower than the minimum required for an accessible route.

Other internal offices beyond the Town Clerk's include employee work spaces which need not be accessible, except to the extent that an employee requires specific accommodations necessary to the execution of that employee's duties. Employee accessibility is described in Title I, and is not part of this review.

Access to the Town Treasurer's and Town Manager's offices is gained through a separate door at the second floor lobby. The requirement for public accessibility within these office spaces is limited simply to enter, turn and leave: doorways must be maintained at 32" clear opening, and an unobstructed turning circle of 60" (or a T-shaped turning space- 36" x 60" on each leg) must be maintained. Private meetings requiring greater accessibility or more space may be held in the conference room on the third floor.

### **The Third Floor: Lister's and Planning and Development offices**

The third floor is accessible by the elevator mentioned earlier. Permanent offices require accessible signs. Paper signs are noted on some doors. Inaccessible knob hardware is observed on the conference room doors: we are told as a matter of policy, the doors are always open during business hours. We observe that double fire rated doors in the corridor are held open with magnetic releases associated with the fire alarm/security system.

Inaccessible knob hardware on the conference room should be replaced with accessible controls. Accessible door controls can be operated with one hand, "without a tight grasping, pinching, or twisting of the wrist" [§309].

Two gender specific restrooms are provided on this level. Both are signed accessible, but both have serious limitations.

The ladies room is a single user, lockable room. Door opening force on the in-swinging door is 7lbs. Maximum allowable force on interior doors is 5 lbs. The door closing speed is approximately 3 seconds, 40% faster than the permissible 5 seconds from a position 90° open to a position 12° open.

The marble threshold may be as much as ¾" high in an existing building, but the edge must be beveled to a maximum slope of 1:2. It may be more practical to achieve this bevel with a thin wood wedge here, rather than grind the existing marble threshold. There is no accessible mirror. An accessible mirror, if mounted above the lavatory, will have the lowest edge of its reflective surface no higher than 40" above the finished floor. In this case, the mirror is on average 54" aff. A second mirror, not above the lavatory, could be installed elsewhere in this room: in which case, the lowest edge of the reflective surface should be no higher than 35".



Clear opening at the toilet compartment is compromised by the presence of a heating radiator restricting the required path of travel. The partition could easily be removed, since the room is treated as a single-user space. Similarly, the partition could be replaced with a half wall, placed closer to the toilet to support a grab bar at an appropriate height and distance from the toilet. A halfwall, if built, must support the 250lb pull required of grab bar anchors.

The grab bar presently installed on the outer wall is too far from the toilet and is useless as a stabilizing or transfer aid. A chase built into the corner further complicates the design of an accessible layout.

The restroom has a water closet of appropriate height, but the operating control is on the "closed" or more distant side.

Exposed plumbing under the sink represents a scrape or scald hazard for users, and must be covered or moved out of the range of required knee clearance.

**604.5 Grab Bars.**

**609.4 Position of Grab Bars.** Grab bars shall be installed in a horizontal position, 33 inches minimum and 36 inches maximum above the finish floor measured to the top of the gripping surface

**604.5.1 Side Wall.** The side wall grab bar shall be 42 inches long minimum, located 12 inches maximum from the rear wall and extending 54 inches minimum from the rear wall.

**604.5.2 Rear Wall.** The rear wall grab bar shall be 36 inches long minimum and extend from the centerline of the water closet 12 inches minimum on one side and 24 inches minimum on the other side.

**604.6 Flush Controls.** Flush controls shall be hand operated or automatic. Hand operated flush controls shall comply with 309. Flush controls shall be located on the open side of the water closet except in ambulatory *accessible* compartments complying with 604.8.2

**606.3 Height.** Lavatories and sinks shall be installed with the front of the higher of the rim or counter surface 34 inches maximum above the finish floor or ground

**606.5 Exposed Pipes and Surfaces.** Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.

### Toe and Knee Clearance

**306.2.1 General.** Space under an *element* between the finish floor or ground and 9 inches above the finish floor or ground shall be considered toe clearance and shall comply with 306.2.

**306.2.3 Minimum Required Depth.** Where toe clearance is required at an *element* as part of a clear floor *space*, the toe clearance shall extend 17 inches minimum under the *element*.

**306.2.5 Width.** Toe clearance shall be 30 inches wide minimum.

### 306.3 Knee Clearance.

**306.3.3 Minimum Required Depth.** Where knee clearance is required under an *element* as part of a clear floor *space*, the knee clearance shall be 11 inches deep minimum at 9 inches above the finish floor or ground, and 8 inches deep minimum at 27 inches above the finish floor or ground.

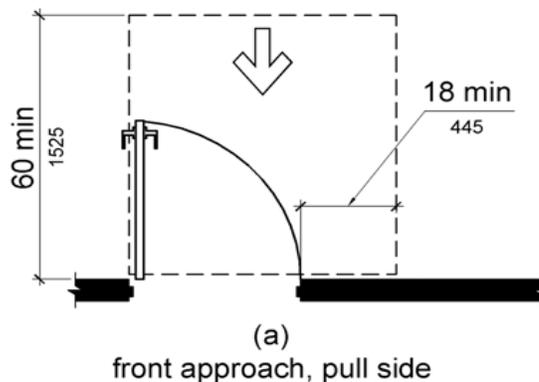
The men's room shares certain similarities with the neighboring ladies' room: with non-compliant door closing speed and pull pressure. In addition, the in-swinging door has no clear space on the pull or latch side of the door: this means a user in a wheelchair can not position himself outside of the arc of the opening door, making it very difficult to exit the room. At least 18" clear space is required (24" is preferred) beyond the latch side of the door to permit this maneuver.

**404.2.8 Closing Speed.** Door and gate closing speed shall comply with 404.2.8.

**404.2.8.1 Door Closers and Gate Closers.** Door closers and gate closers shall be adjusted so that from an open position of 90 degrees, the time required to move the door to a position of 12 degrees from the latch is 5 seconds minimum.

**404.2.9 Door and Gate Opening Force.** The force for pushing or pulling open a door or gate other than fire doors shall be as follows: 1. Interior hinged doors and gates: 5 pounds.

### 404.2.4 Maneuvering clearance:



The lavatory in this room is an elongated “ADA” basin, with compliant lever handle operating controls. However, a floor mounted mechanical device is located under the sink, obstructing the required clear space beneath the sink for a wheelchair.

The mirror must be mounted with the lowest edge of the reflective surface not higher than 40”; if not mounted above the sink, the lowest edge may not be higher than 35” aff.

## Rockingham Public Library



Extensive alterations have recently been completed at the Rockingham Public Library: one of only four Carnegie Libraries in Vermont. Inaccessibility was a principal driver for this project. The Library now includes accessible routes to four levels, with accessible restrooms located on two levels.

While the project was well thought out, planned, and carefully executed to insure accessibility, a few issues remain and merit observation.

No on-site parking had been available before the renovation. In an effort to improve the convenience for patrons with mobility issues, two on-site spaces have been created. One (nearest the accessible entrance) is identified as accessible with appropriate signage. However, when accessible parking is provided, at least one accessible space must be van accessible.

A van accessible parking space is 8’ wide, with an adjacent access aisle an additional 8’ wide. The unstriped, paved space provided here, at 10’ wide, implies an access aisle only 2’ wide. The adjacent and parallel accessible pedestrian route is a new 60” wide concrete sidewalk, creating a total pavement area still only 15 feet wide.

It may be considered defensible to extend the asphalt parking area an extra foot toward the building, and stripe the pedestrian sidewalk and three feet of the present parking space as an access aisle for the van-accessible space. This may result in an occasional and temporary obstruction at the sidewalk when a van lift or ramp is being deployed: perhaps a minor and fleeting inconvenience for a pedestrian, but a substantial benefit for a person relying on a lift van.

An accessible parking space will be functionally level in both slope and cross-slope (sloping less than 1:48), permitting safe and stable transfers from vehicle to a mobility device. The cross-slope here is compliant, but the slope perpendicular to the street averages approximately 1:28.

Creating a level parking space here would require raising the sidewalk behind and beside this space and result possibly in a less safe, steep approach to and from the roadway. This would also result in a steeper sidewalk east of the curb cut, increasing pedestrian effort and seasonal risk.

While this sloped space is not compliant with the 2010 Standard, it recognizes the value of the shortest accessible route to a user dependent on mobility aids.

A flatter site is available behind the library, but this adds considerable distance over a substantially upsloping sidewalk.

Public Works must balance such competing interests on sidewalks, driveway cuts, and pedestrian routes throughout the village.



The earlier principal route to the main entrance included a wide cement apron, sloping to a single step at the Main Street sidewalk. A stepless walk was created next to it, and a single railing was installed to limit the trip hazard created by these changing levels.

This walk, with a slope greater than 1:20, is technically a ramp and requires bilateral handrails. The handrails do not need edge protection.

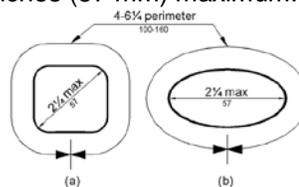
**405.8 Handrails.** Ramp runs with a rise greater than 6 inches (150 mm) shall have handrails complying with 505.

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

**505.4 Height.** Top of gripping surfaces of handrails shall be 34 inches (865 mm) minimum and 38 inches (965 mm) maximum vertically above walking surfaces, stair nosings, and ramp surfaces. Handrails shall be at a consistent height above walking surfaces, stair nosings, and ramp surfaces.

**505.7.1 Circular Cross Section.** Handrail gripping surfaces with a circular cross section shall have an outside diameter of 1¼ inches (32 mm) minimum and 2 inches (51 mm) maximum.

**505.7.2 Non-Circular Cross Sections.** Handrail gripping surfaces with a non-circular cross section shall have a perimeter dimension of 4 inches (100 mm) minimum and 6¼ inches (160 mm) maximum, and a cross-section dimension of 2¼ inches (57 mm) maximum.



## 405 Ramps

**405.2 Slope.** Ramp runs shall have a *running slope* not steeper than 1:12. **EXCEPTION:** In existing sites, buildings, and facilities, ramps shall be permitted to have *running slopes* steeper than 1:12 complying with Table 405.2 where such slopes are necessary due to space limitations.

**405.5 Clear Width.** The clear width of a ramp run and, where handrails are provided, the clear width between handrails shall be 36 inches minimum.

The new cement walk, created to serve the accessible parking space and the municipal sidewalk, requires no handrails.

### The accessible main entrance

The original main entrance remains open for those patrons energetic enough to mount the nine cut stone steps to the double doors. The new accessible entrance is a few yards beyond and within view of the original entrance: close enough that directional signage, while nominally required, is not warranted.

An automatic door is provided, opening into a stair and elevator tower serving all levels.

### The Children's levels

One half flight down, much of the basement level is dedicated to childrens' literature, programs and activities. All circulation paths are generously wide, and shelving is uniformly within current reach ranges. The Children's library is always staffed during Library open hours, and personal assistance is available as needed.

Several computers are clustered for public use, at a table providing access for children using wheelchairs. Knee clearance need only be 24" for children up to age 12.

#### Work spaces for children

**902.4.1 Clear Floor or Ground Space.** A clear floor space complying with 305 positioned for forward approach shall be provided. Knee and toe clearance complying with 306 shall be provided, except that knee clearance 24 inches minimum above the finish floor or ground shall be permitted.

**902.4.2 Height.** The tops of tables and counters shall be 26 inches minimum and 30 inches maximum above the finish floor or ground.

A separate children's program space is set apart in a large room at a lower level, served by a short ramp.



Low tables, child-specific furnishings, and playthings make this a suitable zone for noisier children's activities. A steel door designed to isolate this activity space from the quieter library space, is deeply recessed into a narrow niche creating an inaccessible barrier. The door has no clear space on the in-swinging latch side to allow access by a patron using a wheelchair. Clear maneuvering space on the latch side, a minimum of 18" wide, is required.

The door may be re-hung to swing into the activity space, or the door could be equipped with an automatic door opener; either solution will result in an accessible passageway. If the door is equipped with a magnetic, fire door release mechanism, the door can be left open, eliminating the accessibility issue.

### **Accessible Restrooms**

Two unisex, accessible restrooms are located in the Children's level. While coat hooks are provided at 60" height, a lower hook, no higher than 48" is needed to serve children or a seated user. No accessible, identifying signage was observed on the wall nearest the latch side of the doors at these permanent rooms. No other issues are observed in these compliant spaces.

### **The Accessible Third Floor**

The elevator makes the third floor memorial gallery an accessible event space. A large, open plan room, the gallery can be configured with or without tables and chairs to suit the needs of various non-profit or community organizations, which book this space subject to availability. No accessibility issues are noted.

The original front "grand staircase" provides a separate means of egress, and has been equipped with additional handrails to meet fire safety codes.

**Accessible restrooms** Two gender specific restrooms are provided on the third floor. No signage is provided: paper signs are taped to the wall, but signs on permanent rooms require tactile and visual characters, including Braille, as detailed in the 2010 Standard §703ff.



Access to the men's room is impeded by the unfortunate placement of a water fountain in the clear space required at the latch side of the door. Moving the fountain may be a significant expense, but that cost may not be considered an "undue financial burden" since it is insignificant compared to the total cost of the construction project.

An automatic door opener is an alternate solution to moving the fountain, since the 18" clear space is required only on manual doors and gates. Reversing the door swing is not a solution in this case, as the men's room sink would similarly preclude clear space on the other side.

The flush control on the ladies' room toilet is on the closed, or far side of the tank and should be replaced, either by swapping the tank, or replacing the flush mechanism with a top-mounted control.

A coat hook mounted at 53" is provided in the ladies room toilet compartment. It should be lowered to a maximum of 48", or a second, lower hook added.

The compartment has a self-closing spring hinge: an accessible handle, operable "without a tight grasping, pinching, or twisting of the wrist" is needed on the inside of this stall door.

### **The Main Floor**

The main floor includes a range of comfortable seating options, work spaces, and computer stations. Accessibility of the computer software was not explored. Standards for computer and web accessibility are under review. At a minimum, screen-reader capability is expected.

Circulation paths are wide and accessible, with hard surfaces that are wheelchair-friendly. Standard reach ranges (between 15" and 48" above the floor) are waived in library stacks. The librarian or library assistant are available to assist patrons. Higher shelving and display units range up to 83" high.

A single, small restroom on this level is noted to be inaccessible. When a restroom is inaccessible, a permanent, accessible sign must be posted directing patrons to the nearest accessible restroom. Alterations to this restroom must result in an accessible restroom.

### **The accessible service counter**

Library patrons are served at a low customer service desk near the elevator entrance. Adequate clear space (at least 30" x60") is apparent at the desk, allowing an accessible, parallel approach to this element.

## **The Police and Fire Departments**

The general public may have occasion to visit the police and fire departments to file reports, register complaints, apply for permits, and seek information. Public access to the building, built before the 1992 implementation of the Americans with Disabilities Act of 1990, is generally restricted to the lobby areas.

Visitor parking is provided on the north side of the public service building. A single space is designated as accessible: both by a sign mounted at nearly 8' above the paved space, and by faint, badly deteriorated striping.

The entrances to both departments share a common, cracked and heaved cement apron. Trip hazards have been identified and highlighted with spray paint to call attention to them.

The irregular surfaces should be ground level and the eroded concrete patched to result in a firm, stable and slip resistant path of travel [§302.1].



The threshold of the police department front door is too high, and constitutes a trip hazard. Thresholds in existing buildings may be  $\frac{3}{4}$ " high, but may not present a vertical change of level more than  $\frac{1}{4}$ ". Change of level above  $\frac{1}{4}$ " must be beveled with a slope no greater than 1:2

Service is provided by police personnel behind a glass barrier above a counter 42" high. A lower section of counter, 36" high by a minimum of 36" wide, is required. An alternate accessible solution would include a lower table or accessible work surface provided for those whose business here may involve writing.



The waiting area is open, with a hard accessible floor surface. Low pile, rubber backed weather mats have tapered margins and are not considered a trip hazard.

### **A public restroom**

An inaccessible, single user, unisex restroom is provided for the public. A sign is mounted too high on the restroom door, and should be moved to the wall adjacent to the latch side of the door and lowered: no higher than 60", measured to the center of the sign. A sign may be mounted on the push side of an in-swinging door only if the door has a closer, and which may not be held in the open position.

The lavatory obstructs the 30" x 48" clear space needed to avoid the arc of the in-swinging restroom door. A visitor using a wheelchair could get in, but would have great difficulty getting out. The door can be reversed, or re-hung to swing out.

Plumbing beneath the sink is unshielded. While it is rare to find restroom sinks delivering water hot enough to scald, these pipes –both hot and cold- must be shielded. The risk of scrapes and abrasions on sink hardware is significant for those using wheelchairs. In new or altered installations, the undersink connections should be “high and tight”: well beyond the knee clearance of a seated user.

The restroom mirror is hung too high, with the lowest edge of the reflective surface beginning 41” above the finished floor. If hung above the sink, this lowest edge must be no higher than 40”.

The centerline of the toilet is 24” from the adjacent wall. This places the grab bar 6” beyond the optimum effective reach of a seated user. A wall or half wall can be constructed to fill this space, moving the grab bar within the prescribed reach range: 18” from the toilet centerline. Moving the toilet would be more costly, since its outlet is set into a concrete floor.

Other features of the present restroom are consistent with the 1991 ADA accessibility guidelines, but if altered in the future would need to meet the revised 2010 Standard.

Public access to the Fire Department is limited to the small lobby area. Individuals seeking permits or other information are served by the duty officer. No desk, work area, fixed seating, nor restroom is provided for public use.

Occasionally small groups of students are invited to tour the station as part of a school/community outreach. Access to the equipment bays for such escorted visitors is through the overhead truck doors. Tours are limited to the equipment areas and do not include the upstairs sleeping and training quarters.

## Summary

The services, policies and practices of State and local governments –“public entities”- must be monitored with periodic self-evaluations to insure ongoing accessibility. The Town of Rockingham has designated an ADA coordinator to be responsible for this continuing oversight. The introduction of new programs, activities or services are occasions for such periodic self-evaluation: to identify and understand the downstream impacts of the change(s) on existing programs, policies, services or activities.

Members of the local community who live with disabling conditions can be valued allies in identifying present or potential barriers to accessibility. It is important to include their perspective in discerning appropriate policies and effective remedial actions.

Policies should be developed to insure appropriate, accessible communication in citizen interactions. This may include training staff to identify and access ASL interpreters, large print materials, foreign language speakers, or other effective communication modalities. Similarly, staff must be aware of and familiar with procedures governing requests for “reasonable accommodation”, to assure swift and appropriate resolution of such needs.

In addition, many barriers to accessibility noted in this survey can be removed with little expense or difficulty. An action plan will include a reasonable time line and realistic budget inputs, with designated personnel and benchmarks against which progress can be assessed.

The first priority for barrier removal, specified in the HRC Pre-Determination Conciliation Agreement, is the accessible route from an on-street parking space to the accessible entrance. Other barriers identified in this report may be prioritized consistent with the values of the community expressed through responsible officials, input from disabled community members, the financial and personnel resources available, and other considerations.

Alterations to the municipal infrastructure are subject to the 2010 ADA Standards for Accessible Design, the complete text of which is on-line at [www.ADA.gov](http://www.ADA.gov).

Earlier upgrades to the Town Hall demonstrate a positive progression of accessibility enhancements, but the size and complexity of the facility leaves an ample to-do list beyond the accessible parking space issue, including:

- create a permanent sign identifying the location of the accessible entrance
- resurface the alley, resulting in a defined accessible pedestrian path of travel
- replace the storm drain cover, with grate openings less than ½”
- upgrade informational and interior directional signage at elevators
- upgrade, relocate, replace as needed, signage on all permanent rooms
- create appropriate wheelchair seating in theater
- provide appropriate assistive listening devices for assembly areas
- correct restroom features as noted
- add compliant bilateral stair handrails
- widen at least one theater dressing room door; add accessible hangers
- Insure wheelchair accessible knee clearance at Women’s Club/board room conference table
- Create an accessible service counter in the Town Clerk’s office
  - provide one alternate, accessible non-employee work space
- Revisit third floor restrooms and address door pressure/speed, accessory location, turning space, grab bar reach, clear space at doors.

Extensive recent Library renovations leave little of concern in this facility, specifically:

- permanent signage needed for restrooms on three levels
- resolve the location of the third floor water fountain
- address the clear space at the door to the children's lower activity level
- lower coat hooks in toilet stalls; correct flush control in Ladies' stall
- add second handrail on the ramped front walkway
- widen and stripe the van accessible parking space

The public spaces at the Public Safety Building exhibit certain features inconsistent with either the earlier, 1991 Accessibility Guidelines or the current 2010 Standards, as well as some deferred or recurring maintenance needs:

- refresh striping at the accessible parking space and access aisle
- repair vertically dislocated and crumbling cement surfaces at entrance
- wedge the transition at the police department threshold to eliminate trip hazard
- reverse police waiting room restroom door swing to facilitate egress
- adjust restroom accessories to current standard: grab bar, mirror height, shield lavatory plumbing
- relocate restroom signage to adjacent wall at correct height
- provide lower service counter, or alternate, accessible work surface

Police procedures governing the custody and care of prisoners with disabilities are not considered in this evaluation. There is no accessible holding cell at this location: a written policy concerning the detention and transport of, and communication with, disabled individuals should be developed.

Accessibility in Vermont's historic, often idiosyncratic architecture is an ongoing challenge for public entities. The ADA addresses common accessibility issues with a generalized range of technical standards, yet individuals with special needs may encounter barriers in facilities otherwise considered accessible. For this reason, it is imperative that public notices, announcements and warnings include a statement of inclusion: describing a procedure to request "reasonable accommodations" for specific, self-identified accessibility needs. A typical announcement is included in the appendix, by way of example.

When reasonable accommodations are requested, the town will need sufficient time to identify appropriate resources, so requiring adequate advance notice is important. Certain communication assets, such as an American Sign Language (ASL) interpreter, are difficult to source on short notice. No charges may be assessed people who require such special accommodations.

Facility maintenance staff or contractors undertaking remedial actions are encouraged to call us with concerns or questions. We look forward to being of continuing service to the Village of Bellows Falls/Town of Rockingham.

*Prepared by*

Vermont Accessible Environments, 2016