



## CENTER FOR LIVING & WORKING, INC.

484 Main St. Suite 345, Denholm Building, Worcester, MA 01608  
Voice (508) 798-0350 Toll Free (800) 570-4020  
TTY (508) 755-1003 VP (508) 762-1164  
Facsimile (508) 797-4015  
Website: [www.centerlw.org](http://www.centerlw.org)

Independent Living Services  
Personal Care Management Services  
Deaf & Hard of Hearing Independent Living Services

June 28, 2011

Sandy Lamoine  
Administrative Assistant  
Town of Blackstone  
Municipal Office Building  
15 St. Paul Street, Blackstone, MA 01504

Dear Sandy:

Enclosed are the following:

- Updated Americans with Disabilities Act (ADA) Transition Plan.
- Copy of the original ADA Self-evaluation/Transition Plan. You may recall that one could not be located when I began this survey.
- Copies of the ADA Transition Plan updates on compact disk. It is located in the inner sleeve of the Updated ADA Transition Plan Loose-leaf binder

If you have any questions or if I can be of further assistance, you can call me at 508-755-1401 or send me an email at [mkennedy@centerlw.org](mailto:mkennedy@centerlw.org). I look forward to seeing you at the training.

Sincerely,

Mike Kennedy  
ADA/Access Coordinator

*6/29: Asked Mike to send  
Invoice dated no later  
than 6/30/11.*



## CENTER FOR LIVING & WORKING, INC.

484 Main St. Suite 345, Denholm Building, Worcester, MA 01608

Voice (508) 798-0350 Toll Free (800) 570-4020

TTY (508) 755-1003 VP (508) 762-1164

Facsimile (508) 797-4015

Website: [www.centerlw.org](http://www.centerlw.org)

Independent Living Services

Personal Care Management Services

Deaf & Hard of Hearing Independent Living Services

### **Americans with Disabilities Act Updated Transition Plan for the Town of Blackstone MA**

The ADA is a civil rights law. Under the ADA, civil rights are guaranteed to individuals who experience discrimination because they; 1) have a physical or mental impairment that substantially limits a major life activity, 2) have a record of such an impairment, and 3) are regarded as having such an impairment. Interpretation of the law and its enforcement was intended to be carried out on a case by case basis through the nation's legal system. Specific complaints of individuals may be filed with a number of different federal agencies including the Equal Employment Opportunity Commission (Title I), the United States Department of Justice (Titles II and III), the United States Department of Transportation (Titles II and III), and the Federal Communications Commission (Title IV).

**The ADA is divided into five titles or sections. These are:**

- Title I: Employment
- Title II: State and Local Government and Public Transportation
- Title III: Public Accommodations and Services Operated by Private Entities
- Title IV: Telecommunications
- Title V: Miscellaneous Provisions

**The Town of Blackstone is bound specifically by Titles I and II.**

There is a basic process for complying with the Americans with Disabilities Act:

- Learning about the requirements of the ADA and how it applies to a facility or program;
- Conducting a survey to identify barriers;
- Establishing a list of potential modifications for barrier removal, including changes to policies, facilities and cost estimates;
- Removing existing barriers.

The ADA prohibits discrimination on the basis of disability in all services, programs, and activities provided by small local governments (i.e. towns). Thus, people with disabilities must have an equal opportunity to participate in and benefit from a town's services, programs and



## CENTER FOR LIVING & WORKING, INC.

484 Main St. Suite 345, Denholm Building, Worcester, MA 01608

Voice (508) 798-0350 Toll Free (800) 570-4020

TTY (508) 755-1003 VP (508) 762-1164

Facsimile (508) 797-4015

Website: [www.centerlw.org](http://www.centerlw.org)

Independent Living Services  
Personal Care Management Services  
Deaf & Hard of Hearing Independent Living Services

activities. To accomplish this, the ADA sets requirements for town facilities, new construction and alterations, communication with the public and policies and procedures governing town programs, services, and activities.

An Americans with Disabilities Act (ADA) Self-Evaluation and Transition Plan was conducted and completed by the Center for Living & Working Inc. and Talevi and Haesche, LLC in December of 2006. Pursuant to the United States Department of Agriculture's requirement for an update of the Town of Blackstone's ADA Transition Plan for a grant the Town is seeking, the Center for Living & Working has conducted an evaluation of the following properties owned or under the jurisdiction of the Town:

- Municipal Center – Town Administration & Senior Center
- Municipal Center - Police/Fire Departments
- Blackstone Library
- Blackstone Historical Commission Museum
- Henry S. Goulet Ball Field
- Roosevelt Park
- Terbesi Park
- Attilio Valati Nature Park

In addition to the properties surveyed above, the Center for Living & Working Inc. conducted a survey of the Town of Blackstone's voting poll located at the Saint Theresa's Church Activity Center on 630 Rathbun Street. Precincts one & three vote at the Municipal Center that is included in this survey. An access survey was also conducted on the Blackstone/Millville High School auditorium because this is where the Town meetings take place. The Corrosion Control Center was not surveyed because according the 2006 ADA Self-evaluation; this building is not used by the general public.

It is important that civic activities such as voting and Town Meetings along with any other town-sponsored activities open to the public be accessible to all its citizens. Inability to participate in these activities by people with disabilities due to accessibility issues is discriminatory under Title II of the Americans with Disabilities Act and the Town of Blackstone could be subject to lawsuits under the U.S. Department of Justice.

### Definitions:



## CENTER FOR LIVING & WORKING, INC.

484 Main St. Suite 345, Denholm Building, Worcester, MA 01608

Voice (508) 798-0350 Toll Free (800) 570-4020

TTY (508) 755-1003 VP (508) 762-1164

Facsimile (508) 797-4015

Website: [www.centerlw.org](http://www.centerlw.org)

Independent Living Services  
Personal Care Management Services  
Deaf & Hard of Hearing Independent Living Services

**ADAAG** – Americans with Disabilities Act Access Guidelines. This document contains scoping and technical requirements for accessibility to buildings and facilities by individuals with disabilities under the Americans with Disabilities Act (ADA) of 1990. These were the guidelines that were used in the original Self-evaluation/Transition Plan for the Town of Blackstone in 1996. These guidelines become obsolete on March 15, 2012, so it is highly recommended that the Town use the New ADAAG guidelines when work is being performed.

**New ADAAG** – The Department of Justice published revised regulations for titles II and III of the American with Disabilities of 1990 “ADA” in the Federal Register on September 15, 2010. These regulations adopted revised, enforceable accessibility standards called the 2010 ADA Standards for Accessible Design. The 2010 Standards set minimum requirements for both scoping and technical – for newly designed and constructed or altered State and local government facilities, public accommodations, and commercial facilities to be readily accessible to and usable by individuals with disabilities.

The 2010 Standards may be used as of September 15, 2010 when they were published in the Federal Register as part of the ADA title II and III regulations, but are not required to be used until March 15, 2012. During this 18 month period, people have the option of using either the ADAAG of 1990 or the new 2010 ADA Standards for Accessible Design (New ADAAG). It is high recommended that when accessibility related barriers are removed in the Town of Blackstone that these new standards are used.

**521CMR** – These are accessibility related building codes for the Commonwealth of Massachusetts. All work performed on Public buildings or facilities including construction, reconstruction, alterations, remodeling, additions and changes in use shall conform to 521CMR. This includes both new construction and work to existing buildings and need to be part of the inspection process by the Town’s building inspector. The Mass Architectural Access Board is the enforcement authority of these building codes and can issue fines up to \$1000.00 per day per violation. When doing construction, you need to keep these codes in mind along with the applicable ADA Access Guidelines. In cases where 521CMR and ADA Access Guidelines differ, you need to use the more stringent of the access codes or guidelines.

**AFF** – Above the Finished Floor or Surface.

A copy of “Accessible Play Areas – A Summary of Accessible Guidelines for Play Areas by the U.S. Department of Justice is included in this survey.



## CENTER FOR LIVING & WORKING, INC.

484 Main St. Suite 345, Denholm Building, Worcester, MA 01608

Voice (508) 798-0350 Toll Free (800) 570-4020

TTY (508) 755-1003 VP (508) 762-1164

Facsimile (508) 797-4015

Website: [www.centerlw.org](http://www.centerlw.org)

Independent Living Services

Personal Care Management Services

Deaf & Hard of Hearing Independent Living Services

If you have any questions on this report, or if I can provide further technical assistance, you are welcome to contact me at 508-755-1401 or send me an email at [mkennedy@centerlw.org](mailto:mkennedy@centerlw.org).

Submitted by

Mike Kennedy

ADA/Access Coordinator

# **Town of Blackstone ADA Transition Plan Updates**

## **Municipal Center – Town Administration & Senior Center**

### **Accessible Approach/Entrance:**

#### **Obstacles Which Limits Mobility or Access identified in the Original Transition 2006:**

- 1) The curb cut from the parking lot leading to the entrance ramp at the rear of the Municipal Center has slope readings of 7.6%, 9.2% and 9.8% which exceed the maximum allowed (1:12, 8.3%) for running slope. Note: This was not identified in the original 2006 ADA Transition Plan.

*(ADAAG – 4.7, New ADAAG Section 406, 521CMR Section 21 Curb Ramps)*

**Suggested actions to be taken** – Re-grade curb cut surface area so that the running slope is (1:12, 8.3%). If this is not possible, request a variance from the Mass Architectural Access Board (AAB) seeking relief from Section 31.3 (Slope).

- 2) Ramp to the accessible entrance in the back of the Municipal Center has slope readings of 9.0% and 8.7% which exceeds the maximum allowed 8.3%. Note: This was not identified in the original 2006 ADA Transition Plan.

*(ADAAG Section 4.8, New ADAAG Section 405, 521CMR Section 24 Ramps)*

**Suggested actions to be taken** – Re-grade ramp so that it has a slope of (1:12, 8.3%) or less

- 3) One of the ramp handrail ground mounts is loose and renders it unsteady to hold onto. Note: This was not identified in the original 2006 ADA Transition Plan.

*(ADAAG Section 4.8, New ADAAG Section 405, 521CMR Section 24 Ramps)*

**Suggested actions to be taken** – Repair handrail ground mounts so that they are permanently affixed in the ground and are safe to hold onto.

- 4) The accessible doorway located in the rear of the Municipal Center has pull type door hardware and requires 16 lbs of force to open.

*(ADAAG Section 4.13 (Doors) and 4.13.11 (Door Opening Force), New ADAAG Section 404, 521CMR Section 26 Doors & Doorways)*

#### **Action Items Suggested In Original Transition Plan 2006:**

Provide a power door opener at the accessible entry.

## **Municipal Center Parking**

### **Obstacles Which Limits Mobility or Access identified in the Original Transition Plan 2006:**

The two accessible spaces in front of the municipal center have compliant above-ground signage and stripping. However the seven accessible parking spaces in the rear of the building where the accessible entrance is located have no above-ground signage and the stripping and pavement markings are faded. None of these spaces are labeled van-accessible or have access aisles more than 5.5' wide.

Two van-accessible spaces in the rear of the building are reserved for Senior Center vans.

*(ADAAG Section 4.6, New ADAAG Section 502, 521CMR Section 23 Parking)*

### **Action Items Suggested In Original Transition Plan 2006:**

Resurface and Restripe the parking area adjacent to the Senior Center and provide proper above-ground signage for seven accessible parking spaces.

### **Additional suggestion not in 2006 Transition Plan:**

Reserve two regular parking spaces for the Senior Center vans and leave the actual van accessible spaces available to visitors who need them.

### **Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

None

## **Access to Programs & Services**

- 1) Two drinking fountains, one per floor, protrude 19" into the hallway and the bottoms are located 28 ½ AFF.

*(ADAAG Sections 4.3 (Accessible Routes) and 4.4 (Protruding objects), New ADAAG Sections 204 & 206, 521CMR Section 20 Accessible Routes & Protruding objects)*

### **Action Items Suggested In Original Transition Plan 2006:**

Provide a shelf or bracket under the plane area of the fountain. Shelf should be located no higher than 27" AFF to allow the drinking fountain to be cane detectable. (Alternate: Provide new drinking fountains that meet ADA requirements)

### **Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

A table with brochures and a soda machine were placed on both sides of the water fountain on the first floor that alleviated the protruding object hazard. However, there was no change to the

water fountain on the second floor. That protruding hazard still exists. Provide cane detectable barriers on both sides of the second floor water fountain.

- 2) No accessible signage exists that directs people or room numbers.

*(ADAAG Section 4.30, New ADAAG Section 216, 521CMR Section 41 Signage)*

**Action Items Suggested In Original Transition Plan 2006:**

A complete signage package should be developed for both the interior and the exterior of the building.

**Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

There is minimum sporadic signage on the first floor function rooms posted in non-compliant locations such as a paper sign taped in the middle of the Board of Health door. The Senior Center has a paper sign posted on an inactive door leaf. There is directional signage to the elevator & the restrooms with the universal symbol of access, compliant contrast and character height. However, they don't have Braille.

The second floor has more compliant signage than the first. The signage to most of the municipal offices has compliant contrast and character height, but they don't have Braille. These signs are posted 60" AAF to the centerline which is compliant, but they are not posted on the latch side of the doors. The Town Administrator's and the Town Clerk's are indentified with large white lettering above the sliding glass windows

**Conclusion:** Some signage work as been done, but in many cases, it was not done compliantly and other areas were not addressed yet.

- 3) Tables for petitioners as well as tables for selectman and Town officials do not provide the required clearances. New furnishings should be purchased for the Selectman's meeting room.

*(ADAAG Section 4.32, New ADAAG Section 306, 521CMR Section 35 (Tables, Seating, Knee clearance)*

**Action Items Suggested In Original Transition Plan 2006:**

Provide new furnishing for the Selectman's room. Assume space for eight officials and six petitioners.

**Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

None that I observed. The tables still lacked the proper clearances, such as 27" knee clearance.

- 4) Rebated wood rails for the interior stairs do not meet the requirements for handrails.

*(ADAAG Section 4.9, New ADAAG Section 504, 521CMR Section 27 Stairs & Stairways)*

**Action Items Suggested In Original Transition Plan 2006:**

Add handrails that are 34" to 38" above the stair nosings that are rounded with 1 ½" clearance between them and the existing wood rails.

**Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

No change.

- 5) The existing interior elevator cab does not comply with current ADA and AAB codes. The interior cab dimensions are 48" wide X 50" deep. In order to bring this elevator into full compliance, it will need to be removed and replaced including an enlarged shaft and pit.

*(ADAAG Section 4.10, New ADAAG Section 407, 521CMR Section 28 Elevators)*

**Action Items Suggested In Original Transition Plan 2006:**

The cost of a complete new elevator may be prohibitive at this time. In such case, the existing elevator cab should be upgraded to include as many compliant features as possible.

**Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

No change. The controls inside the cab have raised lettering but no Braille. The alarm button has no raised lettering or Braille.

**Additional access issues and suggestions not in 2006 Transition Plan:**

- 1) There is a time clock outside the Town Clerk's office that protrudes seven inches from the wall that is 44" AFF that is not cane detectable

*(ADAAG Section 4.4, New ADAAG Sections 204 & 206, 521CMR Section 20 Accessible Routes & Protruding objects)*

**Suggestion to remove obstacle:**

Place cane detectable barriers on both sides of the punch clock that is cane detectable.

- 2) The Town Clerk and Collector/Treasurer service windows are 42" AFF which exceeds the compliant height by six inches.

*(ADAAG Section 7.2, new ADAAG Section 904, 521CMR Section 7, Sales and service Counters)*

**Suggestion to remove obstacle:**

Place a shelf that is at least 36" long and 36" AFF or less under the service windows with cane detectable brackets or other objects such as floor plants on both sides.

**Usability of Rest Rooms**

**Obstacles Which Limits Mobility or Access identified in the Original Transition Plan 2006:**

- 1) The following doors 024, 025, 128 and 129 to the men's and women's restrooms on both floors into public spaces do not meet the 18" clear wall space that enable people using a wheelchair or crutches to open the door.



*(ADAAG Section 4.13, New ADAAG Section 404, 521CMR Section 26, Doors & Doorways)*

**Action Items Suggested In Original Transition Plan 2006:**

Remove/replace and reverse swing at doors 024 & 128 (Women's rest rooms). Reconfigure partitions and remove and reinstall doors 025 & 129 (Men's rest rooms)

**Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

No change in restroom door configurations.

- 2) All four public restrooms (2 per floor) exceed the 5lb maximum allowed for interior door opening force. I got readings between 10 and 12lbs.

*(ADAAG Section 4.13 (Doors) and 4.13.11 (Door Opening Force), New ADAAG Section 404, 521CMR Section 26 Doors & Doorways)*

**Action to be taken:**

Adjust door closer so that it requires 5lbs or less to open.

- 3) Restroom doors have no tactile signage or pictograms to identify the restrooms.

*(ADAAG Section 4.30, New ADAAG Section 216, 521CMR Section 41 Signage)*

**Action Items Suggested In Original Transition Plan 2006:**

Instructions were given to review ADAAG Section 4.30 and to install compliant signage throughout the building.

**Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

Tactile signage with pictograms were installed on all four doors but they exceeded the 5'AFF centerline height and they were not mounted on the latch side of the door. If door latch side wall space permits, move this signage to there at 5'AAF to the centerline.

- 4) Accessible stall doors cannot be opened with a closed fist.

*(ADAAG Section 4.17, New ADAAG Section 603, 521CMR Section 30, Toilet stalls, Toilet rooms)*

**Action Items Suggested In Original Transition Plan 2006:**

Provide new hardware that is operable with a closed fist.

**Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

No changes in the accessible stall doors hardware.

- 5) Soap dispensers are mounted too high to operate from the top.

*(ADAAG Sections 4.23.7 & 4.27, New ADAAG Section 604, 521CMR Section 30, Controls & Dispensers, Public Toilet Rooms)*

**Action Items Suggested In Original Transition Plan 2006:**

Provide new soap dispensers in toilet rooms.

**Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

Soap dispensers were lowered to a compliant height but mounted at non-accessible sinks.

**Additional access issues and suggestions not in 2006 Transition Plan:**

Relocate soap dispensers by accessible sinks no higher than 48" AFF.

A couple of sinks do not have protective pipe covering.

**(ADAAG Section 4.24.6, New ADAAG Section 606, 521CMR Section 30 Public Toilet Rooms, Sinks & Lavatories)**

Cover exposed pipes with plastic or insulation.

Coat hooks on the accessible bathroom stalls are mounted above the 48" AFF reach range. Lower them to 48" AFF or less.

# Town of Blackstone ADA Transition Plan Updates

## Police/Fire Departments

### Accessible Approach/Entrance:

#### **Obstacles Which Limits Mobility or Access identified in the Original Transition 2006:**

- 1) The main entrance to the Police/Departments is at the top of a set of concrete steps with nine risers and cannot be entered independently after hours. The platform at the top of the entry steps has a long crack traversing the line of travel, which presents a tripping hazard.

*(ADAAG Sections 4.3, 4.14, New ADAAG Section 206, 404, 521CMR Sections 20, 25, Accessible route & Entrances)*

#### **Action Items Suggested In Original Transition Plan 2006:**

**Option 1:** During normal working hours, when the Town Administration and senior center are open, individuals with disabilities shall be directed to enter the building through the rear accessible entrance. Once within the building, additional signage shall direct Police and Fire Department patrons to proceed to the Town Administrators office where they will be escorted through the connecting door. This connecting door to the Police/Fire Departments does not meet the requirements for 18" of clear wall space but it does have a clear opening of greater than 32". Since the individual will be escorted, the door can be opened by the escort.

Provide a series of directional/procedural signage directing patrons to the Police/Fire Departments at all grade level entry locations and within the building.

After hours, there is a dispatcher located in the area adjacent to the Police/Fire entry lobby. An intercom shall be installed and located at the bottom of the stairs to the lobby. Signage will direct people with disabilities to call the dispatcher. The dispatcher will arrange for someone to meet the individual outside and if required, escort that individual in to the building.

Provide procedural signage directing patrons with disabilities to use the intercom to call the dispatcher after hours.

Provide a telephone or intercom system connecting a device to be located at the bottom of the stairs with the dispatcher. Provide a security camera to ensure that the dispatcher has a clear view of the area at the bottom of the stairs.

**Option 2:** Assuming that the Police Station will be relocated in the reasonably near future, provide a high quality temporary ramp structure and canopy to allow individuals with disabilities to gain access to the upper entry of the Police and Fire Departments. Repair the cracked entry-level exterior slab.

**Option 3:** Provide a permanent ramp structure and cover to allow individuals with disabilities to gain access to the upper entry of the Police and Fire Departments. Repair the cracked entry-level exterior slab.

**Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

There is now a vertical wheelchair lift to the right of the exterior stairs that has not been maintained very well, nor is there protection from the elements. This will substantially reduce its functional life. In addition, the door that leads into the actual lift platform is locked and police personnel were not able to locate the key. This defeats the purpose of even having the lift. In addition, there was no policy in place that addresses the fact that this lift needs to be available to people who need to use it 24 hours per day, seven days a week.



It is unfortunate that the Town chose to install a vertical lift that requires protection from the elements in addition to routine maintenance to have it operable at all times versus a ramp that would have been virtually maintenance free. Due to the fact that this lift is not able to be used, access to the Police station is only available to people with mobility impairments during the time when the municipal offices and the Senior Center are open. **This is a civil rights violation under the ADA Title II and the Town of Blackstone could be vulnerable to a lawsuit through the U.S. Department of Justice and could be responsible for monetary damages.**

**Action that needs to be taken:**

If the Town of Blackstone chooses to keep using this lift, then it needs to modify the lift door so that it does not require the use of a key to either open the door or operate the lift itself. In

addition, it is highly recommended that a covering is placed over and around the lift to protect it from the outdoor elements. This could substantially extend its useful life.

## **Access To Programs & Services:**

### **Obstacles Which Limits Mobility or Access identified in the Original Transition 2006:**

- 1) There is a lot of clutter in the police and Fire Departments. File cabinets are stored in hallways and open areas. In general, the path of travel and doorways need to be cleared of stored materials.

### **Action taken since the barrier was identified in the 2006 ADA Transition Plan:**

Although there is at least the minimum required 36" of clear width in the hall ways, there is still a lot of clutter that could create unnecessary barriers for people with disabilities.

*(ADAAG Section 4.3, New ADAAG Section 206, 521CMR Section 20, Accessible Route)*

### **Additional suggestion not in 2006 Transition Plan:**

There is a set of double leaf doors that separate the police and Fire Departments that require well over five pounds of push force to open.

*(ADAAG Section 4.13.11, New ADAAG Section 404.2.9, 521CMR Section 26.8, Door Opening Force)*

**Suggested action to be taken:** Adjust door closers so that it requires 5 pounds or less to open

## **Usability of Rest Rooms**

In the original transition plan, it was noted that the restrooms for the Police and Fire Departments were for "employee use only". The Americans with Disabilities Act (ADA) mandates that employee areas including restrooms would have to be made accessible as a reasonable accommodation for a staff member who has a mobility related disability. Keep in mind that Police and Fire staff includes other positions such as dispatchers and administrative assistants.

In my observations of both the men's and women's restroom, it is my opinion that the women's rest room could be converted to a unisex accessible restroom. This could be achieved by removing the toilet stall partitions and replacing the sink and hardware with one that meets ADA compliance. I would also recommend reducing the door open force so that it is no more than five pounds.

*(ADAAG Section 4.22, New ADAAG Sections 603,604,605,606,609, 521CMR Section 30, Public Toilet Rooms)*

# **Town of Blackstone ADA Transition Plan Updates**

## **Blackstone Public Library**

### **Accessible Approach/Entrance**

The Blackstone Public Library is a newly constructed building that used ADA accessibility guidelines. There is accessible parking and route of travel from these spaces to the front entrance.

The main entrance vestibule is flat and features power operated door openers that were in operating condition. There are other entrances as well that are flat and have compliant hardware to open.

### **Access to Programs and Services**

The horizontal circulation around the library is very good. There is at least 36" of space in all paths of travel. If there is an area with less than the required 36", then the barriers (tables, chairs, etc) can be moved. The interior doors all have compliant hardware and most require 5lbs or less to open. In addition, the various meeting rooms such as the historical and study rooms have compliant signage on the latch side of the doors with Braille.

### **Obstacles Which Limits Mobility or Access identified in the Original Transition 2006:**

The following doors (119,120,122 and 126) do not meet the 18" clear wall space. Some of these doors are to employee work areas.

*(ADAAG Section 4.13.6, New ADAAG Section 404.2.4, CMR Section 26.6)*

### **Suggested Action Items to Remove Obstacles**

If the need arises for a library patron or employee (as a reasonable accommodation under the ADA) to be able to use these doors independently, then consider reversing the door swing. If that solution isn't feasible, install an automatic door opener.

### **Seats, Tables and Counters**

The computer and reading tables in the adult section are at compliant heights and knee clearances. The chairs are movable to allow easier passage if needed. There are two catalogue tables with one that is at a compliant 32" AFF. There is 27.5" knee clearance under the lower catalogue table sliding keyboard that is compliant according to 521CMR standards.

The children's section of the library including the craft room has movable tables and chairs scattered around that are of different heights and knee clearances. This should enable a child using a wheelchair to find a table that is suitable for his or her needs.

### **Usability of Rest Rooms**

The rest rooms that are open to the adult general public meet the required ADA access requirements. The only issues I found are easily fixable.

#### **Obstacles Which Limits Mobility or Access identified in the Original Transition 2006:**

Bathroom doors require 10 to 15 pounds of forces to open. Door closers can be adjusted to allow for 5lbs or less opening.

*(ADAAG Section 4.13.11, New ADAAG Section 404.2.9, 521CMR Section 26.8)*

#### **Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

The door opening force for both the men's and women's room still around 10lbs to open. In addition, the force required to operate the lavatory faucet in the men's is 10lbs and should only be five.

There is a rest room set up for children as well. The new ADA Access Guidelines have different heights and toilet centerlines based on the age group.



The next time renovations take place in the children's rest room, refer to the chart below for toilet, dispenser and grab bar height for the age group most appropriate for this children's section.

<b>Advisory Specifications for Water Closets Serving Children Ages 3 through 12</b>			
	<b>Ages 3 and 4</b>	<b>Ages 5 through 8</b>	<b>Ages 9 through 12</b>
<b>Water Closet Centerline</b>	12 inches (305 mm)	12 to 15 inches (305 to 380 mm)	15 to 18 inches (380 to 455 mm)
<b>Toilet Seat Height</b>	11 to 12 inches (280 to 305 mm)	12 to 15 inches (305 to 380 mm)	15 to 17 inches (380 to 430 mm)
<b>Grab Bar Height</b>	18 to 20 inches (455 to 510 mm)	20 to 25 inches (510 to 635 mm)	25 to 27 inches (635 to 685 mm)
<b>Dispenser Height</b>	14 inches (355 mm)	14 to 17 inches (355 to 430 mm)	17 to 19 inches (430 to 485 mm)

# Town of Blackstone ADA Transition Plan Updates

## Blackstone Historical Museum

### **Accessible Approach/Entrance:**

#### **Obstacles Which Limits Mobility or Access identified in the Original Transition 2006:**

1) There is a pressure treated wood ramp that was built by a volunteer organization for the Historical Society. It does not fully comply with all the requirements of the ADA. Some modifications can be made to bring the ramp closer to compliance with the ADA.

#### **Action Items Suggested In Original Transition Plan 2006:**

The ramp should be modified to add compliant hand railings and to revise the transition to grade at the bottom of the ramp.

*(ADAAG Sections 4.8.5, 4.3.8, New ADAAG Sections 405.8, 303, 521CMR Section 24.5, 29.2, Ramp Handrails and Changes in Levels)*

#### **Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

The handrails are made of wood and lack the compliant round or oval shape that enables people to easily grip them. There is no longer a transition between the ground surface and the bottom of the ramp.

2) Landings at the top and bottom of the ramp are 5-feet-long. Landings at switchbacks are slightly shorter.

*(ADAAG Section 4.8.4, New ADAAG Section 405.7, 521CMR Section 24.4, Ramp Landings)*

#### **Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

No change to the switchback landings. However, the ramp is still very much usable and the cost to extend the landings would not result in a substantial benefit for people with disabilities. Adding compliant round or oval handrails to the existing wooden rails with 1 ½" clearance between them would cost much less and provide more benefits overall to people who need to use the ramp.

### **Parking and Drop Off Areas**

#### **Obstacles Which Limits Mobility or Access identified in the Original Transition 2006:**

The accessible space is not wide enough to be a van-accessible. In addition, there is no above-ground signage marked with the international symbol of accessibility.

*(ADAAG Section 4.6, New ADAAG Section 502, 521CMR Section 23 Parking & Passenger Loading Zones)*

**Action Items Suggested In Original Transition Plan 2006:**

Expand the existing space from 9' wide to 16' wide and ensure an 8' wide access aisle from the van to the bottom of the ramp. Provide striping & permanently placed signage as required.

**Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

There does not appear to be any changes in the parking space itself. There is a sign posted with the international symbol of accessibility, but it is not permanently placed into the ground and lacks the wording "van-accessible".

**Entrance**

**Obstacles Which Limits Mobility or Access identified in the Original Transition 2006:**

There is only a 13" clearance to the right latch pull-side of the door and the door handle cannot be operated with a closed fist.

*(ADAAG Sections 4.13.6 & 4.13.9, New ADAAG Section 404, 521CMR Section 26, Doors & Doorways)*

**Action Items Suggested In Original Transition Plan 2006:**

A lever handle should be installed on the door at the top of the ramp. There was no mention of how to handle the 13" pull-side clearance.

**Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

No changes have been made to the door.

**Access To Programs & Services**

**Obstacles Which Limits Mobility or Access identified in the Original Transition 2006:**

- 1) Only the first floor is on an accessible route. The second floor is for the use of Historical Society members. If an individual with a disability, member or non-member desires access to materials or displays located on the second floor, a volunteer will bring that material to the first floor for viewing or study purposes.

*(ADAAG Section 4.3, New ADAAG Section 401, 521CMR Section 20, Accessible Route)*

**Action Items Suggested In Original Transition Plan 2006:**

In addition to bringing second floor materials down to the first floor that was pointed out above, take pictures of "interest" on the second floor and create a photo album to keep on the first floor for people who can't use the stairs like they do in some of the historic buildings at Old Sturbridge Village.

- 2) There is a 1" curved step down from the kitchen area to the rear center room adjacent to the toilet room. This room is not accessible from the other direction because the cased opening is only 29" wide.

*(ADAAG Section 4.3.8, New ADAAG Section 303, 521CMR Section 29.2, Changes in Levels)*

**Action Items Suggested In Original Transition Plan 2006:**

Straighten the curve at the step in the kitchen floor and install a continuous one-foot long threshold style ramp into the rear room.

**Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

No action has been taken. The small step still exists.

- 3) There is no signage designating permanent rooms or spaces where programs and services are provided.

*(ADAAG Section 4.3.0, New ADAAG Section 703, 521CMR Section 41)*

**Action Items Suggested In Original Transition Plan 2006:**

A complete signage package should be developed for both the interior and exterior of the building that comply with the appropriate ADA requirements.

**Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

None. There is still no signage.

**Additional access issues and suggestions not in 2006 Transition Plan:**

When performing the access survey, I saw a lot of items that were less than three feet apart that impeded circulation access for people with disabilities. Move objects around so that there is a least 3 feet or more space between them.

*(ADAAG Section 4.3.3, New ADAAG Section 402, 521CMR Section 20, Accessible Route)*

**Usability Of Restroom**

**Obstacles Which Limits Mobility or Access identified in the Original Transition 2006:**

- 1) The restroom door has a knob that cannot be operated with a closed fist.

*(ADAAG Section 4.13.9, New ADAAG Section 404.2.7, 521CMR Section 26.11, Door Hardware)*

**Action Items Suggested In Original Transition Plan 2006:**

Install a lever type bathroom door handle

**Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

A lever door handle has been installed.

- 2) There are no grab bars on the rear and alongside the toilet.

*(ADAAG Section 4.16.4, New ADAAG Section 609, 521CMR Section 30.8 Grab bars)*

**Action Items Suggested In Original Transition Plan 2006:**

Install grab bars on the rear and alongside the toilet that are 42" long and between 33" and 36" AFF.

**Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

None. There are still no grab bars.

- 3) The rest room entry configuration lacks adequate maneuvering space for people using wheelchairs.

*(ADAAG Section 4.22.3, New ADAAG Section 604.3, 521CMR Section 30.5, 6.3, Clear Floor Space)*

**Action Items Suggested In Original Transition Plan 2006:**

There was nothing suggested in the original plan. However, if the door swing were reversed from going into the restroom to going out, then there would be enough space to enter it and close the door.

- 4) There was no mirror in the restroom when it was surveyed in 2006. When it was surveyed in 2010. There was a mirror installed but it was mounted 46" AFF to the bottom of its reflective surface which exceeds the maximum allowed height of 40" by six inches.

**Suggested Action to be taken:**

Lower the mirror so that it is 40" AFF to the bottom of its reflective surface.

*(ADAAG Section 4.19.6, New ADAAG Section 603.3, 521CMR Section 603.3, 521CMR Section 603.3, 521CMR Section 30.11, Mirrors)*

# Town of Blackstone ADA Transition Plan Updates

## Terbesi Park

### Parking and Drop Off Areas

#### **Obstacles Which Limits Mobility or Access identified in the Original Transition 2006:**

There is a partially paved, largely gravel parking area that is about 200' long and about 60' wide that could accommodate between 40 and 50 cars. There are no lined parking spaces and there are also no spaces designated for handicapped parking.

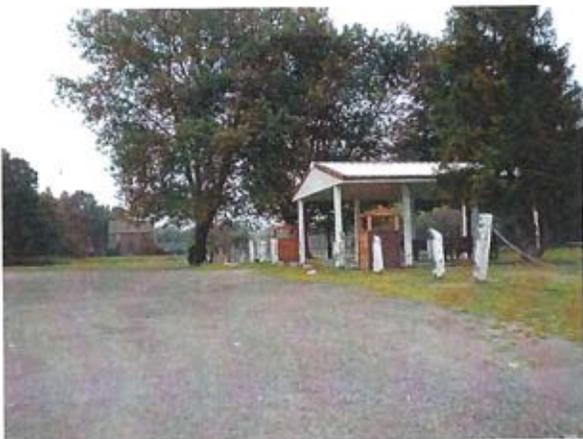
#### **Action Items Suggested In Original Transition Plan 2006:**

Furnish and install a new 34' wide X 23' deep parking area adjacent to the pavilion and play area for one accessible car parking space and one van accessible parking space including an accessible route in front of and alongside both vehicles. In addition, provide wheel stops, above ground permanently placed signage bearing the universal symbol of access and "van accessible" signage for one of the two spaces with parking space striping, and an 8 foot access aisle between them.

*(ADAAG Section 4.6, New ADAAG Section 502, 521CMR Section 23, Parking)*

#### **Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

No parking area improvements have been made.



### Accessible sites and Exterior Facilities

#### **Obstacles Which Limits Mobility or Access identified in the Original Transition 2006:**

There are no accessible connections from the existing parking or proposed accessible parking areas to the playground, pavilion, existing bleachers or potential accessible viewing areas. A system of paved walkways should be installed to allow access to all the various facilities. This site slopes down to the East; one of the ball fields is at a lower elevation than the balance of the park

**Action Items Suggested In Original Transition Plan 2006:**

Provide a new accessible walkway including site preparation and grading as required to connect the proposed accessible parking areas with the concession/toilet facility and the baseball and soccer fields.

*(ADAAG Section 4.1.2, New ADAAG 202, 521CMR Section 3)*

**Action taken since the barrier was identified in the 2006 ADA Transition Plan:**

No walkway improvements have been made.



Views of Terbesi Park showing lack of paved paths of travel.

**Assembly Seating – Outdoor Seating Bleacher Seating for Sporting Events**

**Obstacles Which Limits Mobility or Access identified in the Original Transition 2006:**

There are several small bleachers for viewing baseball. These bleachers are located within the mowed fields. While bleachers are not located at every field, accessible viewing of all fields would provide the optimum situation.

**Action Items Suggested In Original Transition Plan 2006:**

Pave areas to provide accessible seating. Accessible seating areas shall be connected to accessible parking via accessible walkways. Area should not be less than 66” wide and 60” deep to allow seating for two wheelchairs.

*(ADAAG Section 4.3, New ADAAG Sections 402, 403, 521CMR Section 20, Accessible Route)*

**Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

No walkway improvements have been made, nor have any accessible wheelchair spaces been provided.

**Picnic Areas:**

**Obstacles Which Limits Mobility or Access identified in the Original Transition 2006:**

There are picnic tables under the pavilion that are not accessible for people who use wheelchairs. In addition, there is no accessible route to the pavilion and there is a 2 to 4" transition from the unpaved ground surface to the concrete pavilion floor that creates a barrier for wheelchair users to on to it.



**Action Items Suggested In Original Transition Plan 2006:**

Pave an area to provide an accessible picnic site. The accessible site areas shall be connected to accessible parking via accessible walkways. The picnic area should not be less than 12' wide by 12' deep to allow for a six-foot long accessible picnic table and access routes around the perimeter of the table.

*(ADAAG Section 4.3, New ADAAG Sections 402, 403, 521CMR Section 20, Accessible Route)*

**Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

None.

**Alternative suggestion:**

Create an accessible path of travel from the parking area straight to the pavilion that has no change in surface level and if room permits, add an accessible picnic table. If there is not enough

room for an additional table under the pavilion, replace one of the non-accessible tables with an accessible one.



Example of an accessible table.

### **Children's Play Areas:**

#### **Obstacles Which Limits Mobility or Access identified in the Original Transition 2006:**

The existing play area is equipped with both ground level and elevated components. However, these may not be in the proper proportions to meet the ADA. Additionally, while the ground surfaces are soft, designed to limit injuries from falls, they do not provide the "firm, stable and slip resistant" surface required for wheelchair or crutch maneuvering. Total numbers of components are used to determine the requirement for ramps, maneuvering space, forward and side reach, heights, clearances at entry points, transfer supports, etc are some of the requirements for play area compliance with the ADA. Should any alterations or additions be made to these play areas, a detailed evaluation of existing equipment as well as professional recommendations regarding the new component choices and layouts are strongly recommended.



Playground pictures from August 2010

#### **Action Items Suggested In Original Transition Plan 2006:**

Current ADA requirements address only new or altered play areas, the existing areas may remain as is. When and if these play areas are altered, then the requirements for ADA compliance shall apply.

*(ADAAG Section 15.6, New ADAAG Section 1008, Play Areas)*

**Action taken since the barrier was identified in the 2006 ADA Transition Plan:**

It appears that some new playground items may have been installed since the original ADA Transition Plan of 2006, or they have been refurbished. In addition, the ground surface consists of wood chips that also appear to have recently applied. If that is the case, ADA violations have occurred. Wood chips are NOT an acceptable ground surface either in playgrounds or on paths of travel because they do not provide a firm, stable and non-slip surface. Acceptable replacement materials include interlocking rubber matting, plastic matting and poured in place rubber surfacing.

*A copy of an "Accessible play Areas" – A Summary of Accessibility Guidelines for Play Areas by the U.S. Access Board booklet is included in this report that can be used as a reference.*

**Other obstacles not pointed out in the Original Transition Plan 2006:**

There is a walkway from the Rathbun Street sidewalk that leads into the park playground area that is in complete disrepair.



*(ADAAG Section 4.3, New ADAAG Sections 402, 403, 521CMR Section 20, Accessible Route)*

**Suggested action to be taken:**

Resurface the walkway so that it is a minimum of three feet wide with no change in surface levels exceeding 1/4".

## **Rest Rooms**

There are no permanent rest room facilities in this park. However, there were two portable toilets located at the far end of the parking lot by one of the baseball fields and they were both accessible for wheelchair users. It is highly recommended that portable accessible toilets be placed at the Roosevelt and Goulet fields until the required accessibility work is done to those facilities. Opening up rest rooms that are not accessible to people with mobility impairments is discriminatory and can result in ADA lawsuits through the U.S. Department of Justice.

# **Town of Blackstone ADA Transition Plan Updates**

## **Roosevelt Park**

### **Accessible Approach/Entrance**

#### **Parking and Drop Off Areas**

##### **Obstacles Which Limits Mobility or Access identified in the Original Transition 2006:**

There is a gravel parking area that can accommodate between 50 to 70 cars. Otherwise, there is after hours parking available in the rear of the municipal building.

##### **Action Items Suggested In Original Transition Plan 2006:**

Provide an accessible parking area to accommodate three vehicles in the Southwest corner of the gravel lot facing the railroad tracks and the Blackstone Canal. Provide one van accessible space at this location

Furnish and install a new 42 foot wide X 23 feet deep parking area including paving for two car accessible parking and one van accessible parking space. Include an accessible route in front of and alongside both vehicles along with wheel stops, above ground handicapped parking signage and appropriate striping.

**(ADAAG Sections 4.1.2 (5) (a, b), 4.6, New ADAAG Sections 208&502, 521CMR Section 23, Parking)**

##### **Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

No parking area or paths of travel improvements have been made.

#### **Accessible Sites and Exterior Facilities**

There are no accessible connections from the existing parking or proposed accessible parking areas to the concession/toilet facility, playground, pavilion, existing bleachers or potential viewing areas. A system of paved walkways should be installed to allow access to all the various facilities. This site is flat and will require no ramps on grade. Provide a new accessible walkway including site preparation and grading as required to connect the proposed accessible parking areas with various facilities. There is a minor grade change in the area of the concession stand.

##### **Action Items Suggested In Original Transition Plan 2006:**

Some fill, regrading and new paving will be required to the left, right and in front of the concession window.

**(ADAAG Section 4.1.2, New ADAAG 202, 521CMR Section 3)**

**Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

No paths of travel enhancements have been made. The paths of travel are either gravel or grass.

## **Exterior Facilities**

The pass thru window at each of the two concession stands is above 36" high. While individuals without disabilities may order and pick up items at the window, individuals with disabilities are prevented from ordering and picking up items.

**Action Items Suggested In Original Transition Plan 2006:**

Provide a three foot wide portion of the window at a lowered height of 34". Include modification to the workspace, the counter and the exterior wall.

**(ADAAG Section 5.2, New, ADAAG Section 804, 521CME Section 17, Restaurants & Cafeterias)**

**Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

None, the concession windows remain over 34" AFF.

## **USABILITY OF RESTROOMS**

### **Getting to the restrooms**

There is a freestanding restroom facility. The masonry structure is dated and would likely require extensive renovations to provide ADA compliant restrooms.

**Action Items Suggested In Original Transition Plan 2006:**

Renovations should be made to bring this structure into ADA compliance.

**(ADAAG Section 4.1, New ADAAG Section 201, 521CMR Section 3 – Jurisdiction & Scope)**

**Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

No renovations have been made since the barriers have been identified.

## **Doorways and passages**

### **Obstacles Which Limits Mobility or Access identified in the Original Transition 2006:**

- 1) There is no ADA compliant signage identifying the men's and women's restrooms.
- 2) The doors in the wider stalls have openings less than the compliant 32"
- 3) Entry doors have non-compliant knob type hardware.
- 4) Entry doors require more than 15lbs of force to open

### **Action Items Suggested In Original Transition Plan 2006:**

- 1) Install ADA compliant signage at the men's & women's restrooms.
- 2) Re-configure one stall in each restroom so that it provides at a 32" opening.
- 3) Change entry door hardware to lever-type handles.
- 4) Adjust door closer so that it requires less than 15lbs to open.

*(ADAAG Sections 4.1, 4.30, New ADAAG Sections 404, 201, 521CMR Sections 26, 41)*

### **Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

No renovations have been made since the barriers have been identified.

## **Stalls, Lavatories and other restroom elements**

### **Obstacles Which Limits Mobility or Access identified in the Original Transition 2006:**

There are no stalls in either restroom that provide the minimum dimensions of 5' X 5" clear of door swing.

The rims of the urinals in the men's room exceed the maximum compliant height of 17" by 4" for an accessible urinal.



#### **Action Items Suggested In Original Transition Plan 2006:**

Reconfigure one toilet stall in the men's and women's room so that it provides a minimum dimension of 5' X 5' clear of door swing or 5' X 6'.

Lower one of the urinals in the men's room so that it 17" AAF to the rim.

*(ADAAG Section 4.17, 4.18, New ADAAG Sections 604, 605, 521CMR Sections 30.6, 30.10)*

#### **Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

No renovations have been made since the barriers have been identified.

#### **Other obstacles not pointed out in the Original Transition Plan 2006**

- 1) The centerlines of the toilets in the larger stalls are 16.5" in the men's room and 15" for the women's room. They should be 18".
- 2) The sinks in both restrooms lack pipe covering to protect wheelchair users' knees.
- 3) Toilet paper dispensers are mounted above the grab bars which get in the way of people who need to use them.
- 4) The force required to operate lavatory faucets exceed the 5lb maximum allowed at 12 to 15lbs.
- 5) Both the men's and women's room door thresholds are over 2" AFF making it extremely difficult for wheelchair users to enter.

#### **Suggested Action Items To Remove Obstacles**

- 1) If and when renovations are done that involve moving or replacing toilets, ensure that it is 18" to the centerline from the near stall wall.
- 2) Cover the pipes underneath one sink in each restroom with pipe insulation.

- 3) Move toilet paper dispensers below the grab bars.
- 4) Adjust the faucets so that they require 5lbs or less to operate.
- 5) Repair or replace door thresholds that are between ¼" to ½" that are beveled with a slope no greater than 1:2. Or install threshold ramps with a maximum slope of 1:10 to 1:12.

*(ADAAG Sections 4.22, 4.13, New ADAAG Sections 603, 606, 404, 521CMR Sections 30, 26)*

## **Assembly Seating**

*(ADAAG Section 4.33, New ADAAG Section 221, 521CMR Section 14)*

There are several small bleachers for viewing baseball. These bleachers are located within the mowed fields. While bleachers are not located at every field, accessible viewing of all fields would provide the optimum situation.

There is a large elevated viewing structure located behind the main baseball backstop. This structure is older and in need of maintenance and repairs. If and when it is repaired or replaced, a fully accessible structure needs to be provided. In the interim, at grade level seating needs to be provided.

Pave areas to provide accessible seating. Accessible seating areas shall be connected to accessible parking via accessible walkways. Area should be not less 66" wide and 60" deep to allow seating for individuals using wheelchairs and their companions. If seating areas are provided at each team side of all the fields, a total of six locations would be required.

### **Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

No renovations have been made since the barriers have been identified.

## **Children's Play Area**

*(ADAAG Section 15.6, New ADAAG Section 100, 521CMR Section 19)*

The existing play area is equipped with both ground level and elevated components. However, these may not be in proportions to meet the ADA. Additionally, while the ground surfaces are soft, designed to limit injuries from falls, they do not provide the "firm, stable and slip resistant" surface required for wheelchair maneuvering. Total numbers of components are used to determine the requirements for ramps. Maneuvering space, forward and side reach, heights and clearances at entry points, transfer supports, etc are some of the requirements for play area compliance with the ADA. Should any alterations or additions be made to these areas, a detailed evaluation of the existing equipment as well as professional recommendations regarding the new component choices and layouts are strongly recommended.

**Action taken since the barrier was identified in the 2006 ADA Transition Plan:**

No renovations have been made since the barriers have been identified.

# **Town of Blackstone ADA Transition Plan Updates**

## **Henry S. Goulet Ball Field**

### **Parking and Drop Off Areas**

#### **Obstacles Which Limits Mobility or Access identified in the Original Transition 2006:**

Due to the expansive nature of this site, it is recommended that a total of three accessible parking areas be provided. Each area should be designed to accommodate two vehicles with one van accessible space per area. Note that the existing parking areas are gravel and not paved surfaces. For this reason accessible parking areas are enlarged to provide accessible routes on either side of and between adjacent vehicles.

Provide one accessible parking area in the southwest corner of the gravel lot facing Mendon Street. Provide a second accessible parking area adjacent to the concession stand. Provide a third accessible parking along the north edge of the elementary school parking area closer to the soccer fields. Each location will have one van accessible space.

*(ADAAG Sections 4.1.2 (5) (a, b), 4.6, New ADAAG Sections 208&502, 521CMR Section 23, Parking)*

#### **Action Items Suggested In Original Transition Plan 2006:**

Furnish and install two new 34' wide x 23' deep parking areas including paving for one accessible parking space and one van accessible including an accessible route in front of and alongside both vehicles, wheel stops, signage, parking space striping and appropriate markings.

Modify the existing accessible parking area on the adjacent school property nearest the soccer fields. This work includes striping, signage and the addition of an accessible route in front of the parking spaces.

#### **Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

No parking area or paths of travel improvements have been made.

### **Accessible Sites and Exterior Facilities**

#### **Obstacles Which Limits Mobility or Access identified in the Original Transition 2006:**

- 1) There are no accessible connections from the existing parking or proposed accessible parking areas to the concession/toilet facility, existing bleachers or potential accessible

viewing areas. A system of paved walkways should be installed to allow access to the concession/toilet facility and each of the baseball and soccer fields. The grade changes are not so significant as to require ramps, however walkways with slopes no greater than (1:20) (50%) may need to double back on themselves to reach the fields.

*(ADAAG Section 4.1.2, New ADAAG 202, 521CMR Section 3)*

**Action Items Suggested In Original Transition Plan 2006:**

Provide a new accessible walkway including site preparation and grading, as required, to connect the proposed accessible parking areas with the concession/toilet facility and the baseball and soccer fields.

**Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

No paths of travel enhancements have been made. The paths of travel are either gravel or grass.

- 2) The pass thru window at the concession stand is above 34" high. While individuals without disabilities may pick up items at the window, individuals with disabilities are prevented from ordering and picking up items.

*(ADAAG Section 5.2, New, ADAAG Section 804, 521CME Section 17, Restaurants & Cafeterias)*

**Action Items Suggested In Original Transition Plan 2006:**

Provide a three foot wide portion of the window at a lowered height of 34" AFF.

**Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

None, the concession window remains over 34" AFF.



## Usability Of Restrooms

The concession stand structure also houses two public restrooms. There are enlarged stalls, both of which fall short of full ADA compliance. Although the structure appears to be relatively new, the restrooms do not comply with the ADA. Modifications must be made to bring this structure into ADA compliance.

*(ADAAG Section 4.22, New ADAAG Section 213, 603, 521CMR Section 30 -Toilet Rooms)*

### **Action Items Suggested In Original Transition Plan 2006:**

Revise the existing structure to address the items listed below and provide ADA compliant restrooms. Scope shall include revisions to entry door hardware and sill conditions including paving modifications as required.

- 1) Entry doors to the rest rooms are 36" wide. However, there are stall doors that were recently installed that only provide 24" clear opening even though the stall openings themselves have room for much wider door openings in both the men's and women's restrooms.

In the women's restroom, there is another toilet stall that is compliant in its dimensions and the stall doors have a compliant clear opening of 32". However, the stall is not accessible because the door opens into the stall. To remedy this, reverse the door swing so that it opens out instead of in.



*ADAAG Section 4.13 Doors*

Replace narrow stall doors with ones that provide a minimum 32" clear opening.

- 2) Door hardware to the rest rooms are not operable with a closed fist.

*(ADAAG Section 4.13, New ADAAG Section 404, 521CMR Section 26 - Doors)*

Replace door knobs with level type hardware.

- 3) There are no grab bars in both men's and women's stalls that could be accessible.

*(ADAAG Section 4.17, New ADAAG Section 604, 521CMR Section 30.6 - Toilet Stalls)*

Install 36 to 42" grab bars behind and alongside accessible toilets between 33' to 36" AFF. The diameter of the grab bars should be 1 ¼" to 1 ½" and be round or oval shaped. There should be 1 ½' between the grab bar the wall.

- 4) There are no mirrors in either restrooms

*(ADAAG Section 4.23, New ADAAG Section 213, 521CMR Section 30 - Bathrooms)*

If and when mirrors are installed, make sure that they are mounted no higher than 40" AFF to the bottom of its reflective surface.

- 5) In the men's room, the rim to the urinal is 18.5" AFF

*(ADAAG Section 4.18, New ADAAG Section 605, 521CMR Section 30.10 - Urinals)*

Lower urinal so that the rim is no higher than 17" AFF.

- 6) There is no compliant signage at the both the men's and women's restrooms.

*(ADAAG Section 4.30, New ADAAG Section 216, 703, 521CMR Section 41 -Signage)*

Install compliant signage 60" AAF on the latch side of the rest rooms doors.

**Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

No accessibility changes have been made.

#### **Additional Comments**

When additions to, reconstruction, remodeling, alterations or repairs of existing public buildings or facilities are done, that require a building permit or which are so defined by a state or local inspector, **this work must comply with all applicable ADA access codes and Mass 521CMR State access codes whether it is performed by a licensed contractor, town employee or volunteer organizations.**

There was a lot of work that appears to be recently performed without any regards to the applicable accessibility laws. There are three glaring examples of toilet stalls that have accessible dimensions for a wheelchair user, but due to the fact that stall doors with only 22" of clear opening space were installed or that the door opens into the stall versus out, a wheelchair user can not access them.

### **Other obstacles not pointed out in the Original Transition Plan 2006:**

- 1) The door thresholds for the women's restroom is 1 ¼" AFF and 1 ½" AFF for the men's room. This exceeds the ADA maximum allowed height of ¼".

*(ADAAG Sections 4.13.8 (Door Thresholds) and 4.5.2 (Changes in Level), New ADAAG Section 303, 404, 521CMR Section 23, 26)*

**Action item(s) suggested** -Repair or replace door thresholds that are between ¼" to ½" that are beveled with a slope no greater than 1:2. Or install threshold ramps with a maximum slope of 1:10 to 1:12.

- 2) The walkway that surrounds the concession/toilet facility has four inch gap between concrete slabs. In addition, there are storage containers and debris that reduce the 36" minimum width of an accessible route.

*(ADAAG Section 4.3, New ADAAG Sections 206 & 302.3, 521CMR Section 20, Accessible Routes)*



**Action item(s) suggested** -Fill in gaps between the concrete slabs and remove storage containers and debris from the walkway to the concession stand and restrooms.

# **Town of Blackstone ADA Transition Plan Updates**

## **Attilio Valati Nature Park**

### **Accessible Approach/Entrance**

#### **Parking & Drop Off Areas:**

#### **Obstacles Which Limits Mobility or Access identified in the Original Transition 2006:**

The park is small and would likely accommodate as many as 25 parking spaces if there was an organized layout. Assuming that the drive/parking and turn around areas were newly graveled and maintained, there would be a need for some accessible parking.

#### **Action Items Suggested In Original Transition Plan 2006:**

Furnish and install a new 30' wide X 23' deep parking area including paving for one car accessible and one van accessible parking space including an accessible route in front of and alongside both vehicle, wheel stops, signage, parking space striping and appropriate access aisle markings.

**(ADAAG Sections 4.1.2 (5) (a, b), 4.6, New ADAAG Sections 208&502, 521CMR Section 23)**

#### **Action taken since the barrier was indentified in the 2006 ADA Transition Plan:**

No parking area or paths of travel improvements have been made.

### **Accessible sites and exterior facilities**

#### **Obstacles Which Limits Mobility or Access identified in the Original Transition 2006:**

Nature and stream viewing and picnicking activities are activities currently unavailable for people with disabilities.

#### **Action Items Suggested In Original Transition Plan 2006:**

Provide a new accessible walkway including site preparation and grading as required to connect the proposed accessible parking areas with the streamside viewing and picnic areas. Pave an area to provide an accessible picnic site. The accessible site area shall be connected to accessible parking via accessible walkways. The area should be not less than 12' wide by 12' deep to allow for an accessible 6' picnic table and access routes around the perimeter of this table.

Pave areas to provide accessible seating for nature viewing. Access to seating areas shall be connected to accessible parking via accessible walkways. Area should be not less than 66" wide by 60" deep to allow two seating areas for individuals using wheelchairs and their companions

**(ADAAG Section 4.1.2, New ADAAG Sections 201, 202, 521CMR Sections 19, 20 & 22)**

**Action taken since the barrier was identified in the 2006 ADA Transition Plan:**

No work has been done to this area since it was identified in the 2006 ADA Transition Plan.

## **Town of Blackstone ADA Transition Plan Updates**

### **Veterans Memorial Recreational Park**

At the time the original ADA Self-Evaluation/Transition Plan was conducted in 2006, the site was under construction and not in use. As of late July 2010, the site was still closed off to the public.

If and when that site does re-open, refer to the original action items suggested in the 2006 Transition Plan. Those suggestions revolved around accessible parking, paths of travel to the fields and viewing of the soccer fields.

# Town of Blackstone ADA Transition Plan Updates

## St. Theresa's Church – Voting Poll

Saint Theresa's Church is used as a voting poll for residents in District 2. Districts 1 and 3 vote at the Municipal Center. One of the reasons for having multiple polling locations in this small town is to make it easier for residents to actually get there because getting to the other side of town is a longer ride because you have to go around Harris Pond.

The purpose of this self-evaluation is to ensure that people with disabilities can park, enter the building and vote. It is not meant to be a full blown access assessment.

### Accessible Approach/Entrance

The path of travel to the building entrance from the handicapped parking spaces is flat and it is in good condition. Entering the building does not require the use of stairs or a ramp. There are three parking spaces that are designated for handicapped parking. There are a couple buildings located in this area and it was difficult to determine what parking lot serves what building, so I was not able to determine if three spaces are a compliant amount.

### **Obstacles Which Limits Mobility or Access**

- 1) The handicapped parking spaces lack 5' access aisles for car accessible spaces and an 8' access aisle for a van accessible space
- 2) There is no accessible parking space designated as 'van accessible' with signage.
- 3) The signage designating the handicapped parking spaces are compliant. However, they are mounted at 38" AFF and are obscured by vehicles parked in those spaces.

*(ADAAG Sections 4.1.2 (5)(a), 4.6, New ADAAG Section 208,502, 521CMR Sections 23)*



## **Suggested Action Items**

1) Re-strip the existing handicapped parking spaces and create access aisles. One of these spaces must be van-accessible. Two handicapped parking spaces may share an access aisle. Use the following measurements when re-striping:

- Parking spaces 96" or 8' wide
- Access aisle for car accessible space 60" or 5' wide
- Van accessible parking space access aisle 96" or 8" wide

2) Raise the height of the handicapped parking signs between five to eight feet from the ground to the top of the sign. Note that the signs must be permanently located.

3) Add signage that designates "van-accessible" to the handicapped parking space with the eight foot access aisle.

## **Entrance**

The entrance to the building is an old double leaf doorway with hardware that is a loop handle that requires a person to depress the latch with their thumb. I was told that the thumb latch is taped down on election days, so all you have to do is pull the handle to enter the building.

## **Obstacles Which Limits Mobility or Access**

- 1) The door way has only 31" of clear space when only one leaf is opened.
- 2) There is a one inch change in surface level where the asphalt meets the concrete doorway landing as you approach the entrance.
- 3) The door hardware requires the use of your thumb to depress the latch and open the door. Although they currently claim to tape the thumb latch down on election days that practice may not take place consistently, especially when you have personnel turnover.

*(ADAAG Sections 4.5, 4.13 & 4.14, New ADAAG Sections 303,309 & 404 521CMR Sections 22 & 26)*



### **Suggested Action Items:**

- Add asphalt and grade the surface so that there is a smooth transition from the parking lot surface to the concrete platform entrance with a slope of 2% (1:50) or less.
- Install an automatic door opener that opens both doors.
- Replace the doorway with one that has a minimum of 32" clear opening space. The clear opening is measured from the face of the stop on the latch side to the face of the door when it is open 90 degrees. A standard 36" doorway provides the compliant clear opening requirement. In addition, make sure the door hardware is operable with one hand and a closed fist between 36" to 48" AFF. Lever-operated, push-type mechanisms and U-shaped handles are acceptable designs.

### **Access to the voting area**

Once you enter the building, you turn left down a hallway through a set of doubles that are both kept open to an open room where the voting takes place. There are no barriers that limit mobility and access.

As a result of the Help America Vote Act (HAVA), each voting poll is required to have an Automark voting machine that enables people with disabilities to vote independently. This is especially helpful for people who have mobility and visual impairments, because you can change the size and/or contrast of the display screen font. In addition, the machine includes headphones and an electronic voice guides you through the voting process. This is a tremendous victory for people who are totally blind and had to rely on some else to mark the ballot for them.

It's up to the poll workers to know why the Automark voting machines are there, how to assist a voter who is having trouble with the machine. Also, please make sure that the Automark machine is placed in an area where the screen is not visible to the public.

### **Usability of Restrooms**

There is a set of men's and women's restrooms that are totally non-compliant. The signage is placed in the middle of the door and has no raised and Braille characters. The restrooms also lack an accessible toilet stall and lavatory.

Due to the fact that voting is typically a short term process where voters are in and out of the building for a half hour or less, it is not necessary to conduct a comprehensive self-evaluation of the entire building. However, this building should not be used for events or meetings that are open to the public until extensive accessibility renovations are done to these restrooms. As an alternative solution, provide an accessible unisex toilet room. Holding public meetings there could expose the Town of Blackstone to ADA related lawsuits through the U.S. Department of Justice.

If and when renovations are done to the existing Men's and Women's restrooms, or a separate accessible unisex restroom is created, use the following access codes and guidelines:

- 521CMR Sections - 30 (Public Toilet Rooms), 41 (Signage),
- New ADAAG Sections - 603 (Toilet and Bathing Rooms), 605 (Urinals), 606 (Lavatories and Sinks), 606 (Grab Bars).

# **Town of Blackstone ADA Transition Plan Updates**

## **Blackstone Millville Regional High School – Annual Town Meeting**

The Blackstone Millville Regional High School auditorium is used for the Annual Town Meeting. The High School was originally constructed in 1969, but there has been some work done to since then, including a new ramp that leads you to the Auditorium and Gymnasium.

### **Accessible Approach/Entrance**

The path of travel from the small parking lot closest to the accessible entrance is flat and in good condition. The switchback ramp to the court yard area that leads to the Auditorium and the Gymnasium is 100% compliant in slope, width and handrails. The people who built it deserve a lot of praise for this work.

The entrance to the auditorium consists of double doors that provide a compliant 34” clear opening. The door threshold and level style door hardware are compliant as well.

### **Obstacles Which Limits Mobility or Access**

The only issue I found was that there is a 5.8% slope in front of the entrances. The area in front of doorways need to be level (Slope no more than 1:50 or 2%).

*(ADAAG Section 4.13, New ADAAG Section 404, 521CMR Section 26)*

### **Suggested Action Item**

Next time work is being performed on the courtyard surface, re-grade it so that there is a level landing area in front of the doors.

### **Parking and Drop-Off Areas**

There are two handicapped parking spaces in a small parking lot closest to the accessible entrance. The spaces are compliant 8’ wide and share an 8’ wide access aisle that serves as crosswalk to a curb cut in the sidewalk that leads to the accessible entrance. There is also above-ground signage at the head of each space that bears the universal symbol of accessibility.

### **Obstacles Which Limits Mobility or Access**

The only thing missing to make these spaces 100% ADA compliant is the lack of “van-accessible” signage.

*(ADAAG Section 4.6, New ADAAG Section 502,521CMR Section 23)*

### **Suggested Action Item**

Add a sign beneath one of the existing above-ground handicapped parking signs designating it as "van accessible".

### **Access to Goods and Services – Auditorium**

One you enter the high school through the sets of double doors, you have access to the auditorium straight ahead. There are 661 seats all totaled in this area. Currently, there is no designated accessible seating though the area between the first and second level is flat and could accommodate people using wheelchairs and their companions. In addition, there are no seats with movable armrests to accommodate people who use crutches or have difficulty walking.

The slopes of the aisles from the level section between the two seating sections to the stage all exceed the maximum ramp slope of 8.3% (1:12). The slope readings ranged from 9.5% to 11.5%. There is no accessible vertical access to the second level except through the use of stairs.

To access the stage from the auditorium, a person with mobility impairment has to go out through the middle row doorway on the left side of the stage, go down the hallway, and enter through two sets of double doors to the stage.

One of the times I was at the auditorium, there was new carpet being installed. Hopefully, that was the only work performed here because if major renovations were done from 1991 on, there would be several ADA access and Mass 521CMR violations.

### **Suggested Action Items**

Assuming that new carpeting was the only work performed, the following accessibility work would need to be performed if a major renovation project were to take place at the high school. These recommendations would bring the auditorium into compliance.

- Create seven wheelchair accessible spaces. Wheelchair accessible spaces are a minimum 36" wide X 60" deep. Where two adjacent wheelchair spaces are provided, each space may be a minimum of 33" wide. Wheelchair spaces must be flat with slopes no greater than 1:48. They shall be dispersed throughout the auditorium, not segregated to one area. One companion seat shall be provided for each wheelchair space. A companion seat must be at the same floor surface height as the wheelchair accessible seat. Companion seats may be movable.
- Create 33 designated aisle seats. Designated aisle seats have folding or retractable armrests and are located on the aisle side of the seat. In addition, each designated aisle seat shall be identified by a sign or a marker such as the universal symbol of access.

- Provide vertical access to the stage. Due to space constraints, a vertical lift would need to be installed on either side of the front of the stage.

*(New ADAAG Sections 221, 802 & 410, 521CMR Sections 14 & 28)*

### **Usability of Rest Rooms**

The restrooms closest to the auditorium are totally non-compliant. However, there are accessible restrooms further down the hall by the gymnasium. **Assuming that these non-compliant bathrooms are open during events that are open to the public, in order to hold annual town meetings, or any other public events that are non-discriminatory for people with disabilities, these accessible restrooms must be open as well. In addition, signage complying (New ADAAG Section 216 & 703, 521 CMR Sections 25.6 & 41) must be provided at the inaccessible rest rooms directing people to the accessible ones by the gymnasium. In addition, there must be signage at the accessible rest rooms indicating that they are accessible.**

### **Accessible Rest Rooms by the Gymnasium**

Both the boys & girls restroom by the gymnasium for the most part comply with the applicable ADA access guidelines and the Mass 521CMR building codes. There are a few minor violations that would need to be addressed in order to achieve full compliance and be more usable for people with disabilities. (New ADAAG Sections 603, 604 & 606, 521CMR Section

#### **Accessible Boy's Rest Room:**

- 1) The toilet in the accessible stall has a centerline of 19" (Should be 18") and the flush control is on the wrong side, making it a more difficult reach to flush.

**Solution** – If and when this toilet is replaced, make sure the centerline is 18" from the near wall and that the flush control is on the short side. Automatic flush controls can be used as well.

- 2) The toilet paper dispenser is mounted above the grab bar which gets in the way of people trying to use it.

**Solution** – Mount the dispenser below the grab bar.

- 3) The top of the accessible lavatory is 35.5" AFF and there is no protective wrap on the piping below it.

**Solution** – Wrap the pipe below the lavatory. If and when the sink is moved or replaced, mount it at a height no more 34" AFF to the top and 27" AFF knee clearance.

- 4) The mirror is mounted 50" AFF to the bottom of its reflective surface.

**Solution** – Lower the mirror to 40”AFF or less to the bottom of its reflective surface.

**Accessible Girls Rest Room:**

- 1) The toilet in the accessible stall has a raised seat mounted on it which I assume is for a student of the high school. The toilet height without this would be compliant. However, it has a centerline of 19” (Should be 18”) and the flush control is on the wrong side, making it a more difficult reach to flush.

**Solution** – If and when this toilet is replaced, make sure the centerline is 18” from the near wall and that the flush control is on the short side. Automatic flush controls can be used as well.

- 2) The toilet paper dispenser is mounted above the grab bar which gets in the way of people trying to use it.

**Solution** – Mount the dispenser below the grab bar.

- 3) The top of the accessible lavatory is 35”AFF.

**Solution** – If and when the sink is moved or replaced, mount it at a height no more 34”AFF to the top and 27” knee clearance.

- 4) The mirror is mounted 49”AFF to the bottom of its reflective surface.

**Solution** – Lower the mirror to 40”AFF or less to the bottom of its reflective surface.

# ACCESSIBLE PLAY AREAS

## A Summary of Accessibility Guidelines for Play Areas



U.S. Access Board  
Summary of Accessibility Guidelines  
for Play Areas

## INTRODUCTION

The Americans with Disabilities Act (ADA) is a comprehensive civil rights law that prohibits discrimination on the basis of disability. The ADA requires that newly constructed and altered State and local government facilities, places of public accommodation, and commercial facilities be readily accessible to, and usable by, individuals with disabilities. Recreational facilities, including play areas, are among the facilities required to comply with the ADA.

The Architectural and Transportation Barriers Compliance Board - often referred to as the "Access Board" - has developed accessibility guidelines for newly constructed and altered play areas. The play area guidelines are a supplement to the Americans with Disabilities Act Accessibility Guidelines (ADAAG). Once these guidelines are adopted as enforceable standards by the Department of Justice, all newly constructed and altered play areas covered by the ADA will be required to comply. These guidelines also apply to play areas covered by the Architectural Barriers Act (ABA).

### Summary

This guide is intended to help designers and operators in using the accessibility guidelines for play areas. These guidelines establish minimum accessibility requirements for newly constructed and altered play areas. This guide is not a collection of playground designs. Rather, it provides specifications for elements within a play area to create a general level of usability for children with disabilities. Emphasis is placed on ensuring that children with disabilities are generally able to access the diversity of components provided in a play area. Designers and operators are encouraged to exceed the guidelines where possible to provide increased accessibility and opportunities. Incorporating accessibility into the design of a play area should begin early in the planning process with consideration to layout, circulation paths, and the selection of play components.

The play area guidelines were developed with significant public input and carefully considered the balancing of costs, safety, and accessibility. The Access Board sponsored a Regulatory Negotiation Committee to develop proposed guidelines. The public was given an opportunity to comment on the proposed guidelines and the Access Board made changes to the proposed guidelines based on the public comments. The Regulatory Negotiation Committee represented the following groups and associations:

American Society of Landscape Architects	National Easter Seal Society
ASTM Public Playground Committee	National League of Cities
ASTM Soft Contained Play Committee	National Parent-Teacher Association
ASTM Playground Surfacing Systems Committee	National Recreation and Park Association
International Play Equipment Manufacturers Association	Spina Bifida Association of America
National Association of Counties	TASH
National Association of Elementary School Principals	United Cerebral Palsy Association
National Child Care Association	U.S. Access Board
National Council on Independent Living	

This guide is designed to assist in using the play area accessibility guidelines and is divided into the following sections:

- Where Do the Play Area Guidelines Apply?
- What is a Play Component?
- How Many Play Components Must Be on an Accessible Route?
- What Are the Requirements for Accessible Routes?
- What Other Accessibility Requirements Apply to Play Components?
- Soft Contained Play Structures

Copies of the play area accessibility guidelines and further technical assistance can be obtained from the U.S. Access Board, 1331 F Street, Suite 1000 NW, Washington, DC 20004-1111; 800-872-2253, 800-993-2822 (TTY); [www.access-board.gov](http://www.access-board.gov). Alternate formats of this document are also available upon request.



U.S. Access Board  
Summary of Accessibility  
Guidelines for Play Areas

<b>Play Area Terms</b>	<b>4-5</b>
<b>Where Do the Play Area Guidelines Apply?</b>	<b>6-8</b>
New Construction .....	6
Alterations .....	6
Equivalent Facilitation .....	6
Phasing in Play Areas .....	7
Play Areas Separated By Age .....	8
Geographically Separated Play Areas .....	8
<b>What is a Play Component?</b>	<b>9-13</b>
Play Components .....	9
Different "Types" .....	10-11
Elevated Play Components .....	12
Ground-Level Play Components .....	13
<b>How Many Play Components Must Be On An Accessible Route?</b>	<b>14-18</b>
Ground Level Play Components - One of Each Type .....	14
Ground Level Requirements - Based on Elevated Play Components ...	15
Elevated Play Components .....	16
<b>Step-by-Step Guide</b>	<b>17</b>
<b>Play Area Evaluation Example</b>	<b>18</b>
<b>What Are the Requirements For Accessible Routes?</b>	<b>19-32</b>
Accessible Routes .....	19
Ground-Level Accessible Routes .....	20-21
Accessible Ground Surfaces .....	22
Accessible Surfaces Located in the Use Zone .....	22-23
Elevated Accessible Routes .....	24
When Ramps Are Required .....	25-27
When Transfer Systems Are Used .....	28-31
Connected Elevated Components .....	32
<b>What Other Accessibility Requirements Apply to Play Components?</b>	<b>33-37</b>
Clear Floor or Ground Space .....	33
Maneuvering Space .....	34
Entry Points and Seats .....	35
Play Tables .....	36
Reach Ranges (Advisory) .....	37
<b>Soft Contained Play Structures</b>	<b>38</b>
<b>Alterations</b>	<b>39</b>
<b>Acknowledgements</b>	<b>40</b>



## Play Area Terms

Many terms are used throughout this guide to describe the play area guidelines. Familiarity with these terms is important when applying the guidelines. Other definitions are provided in ADA/ABA.

**ABA - Architectural Barriers Act**

**Access Board** – An independent Federal agency that develops accessibility guidelines under the ADA and other laws. The Access Board is also known as the Architectural and Transportation Barriers Compliance Board.

**Accessible** – Describes a site, building, facility, or portion thereof that complies with the play area guidelines.

**Accessible Route** – A continuous unobstructed path connecting all accessible elements and spaces of a building or facility. Inside the boundary of the play area, accessible routes may include platforms, ramps, elevators, lifts. Outside the boundary of the play area, accessible routes may also include parking access aisles, curb ramps, crosswalks at vehicular ways, walks, ramps, and lifts.

**ADA** – Americans with Disabilities Act.

**Alteration** – An alteration is a change to a building or facility that affects or could affect the usability of the building or facility or part thereof. Alterations include, but are not limited to, remodeling, renovation, rehabilitation, reconstruction, historic restoration, resurfacing of circulation paths or vehicular ways, changes or rearrangement of structural parts or elements, and changes or rearrangement in the plan configuration of walls and full-height partitions. Normal maintenance is not an alteration unless it affects the usability of the facility (*see section on alterations for more details*).

**Amusement Attraction** – Any facility, or portion of a facility, located within an amusement park or theme park, that provides amusement without the use of an amusement device. Examples include, but are not limited to, fun houses, barrels, and other attractions without seats.

**ASTM** – American Society for Testing and Materials.

**Berm** – A sloped surface at ground level designed to ascend or descend in elevation.

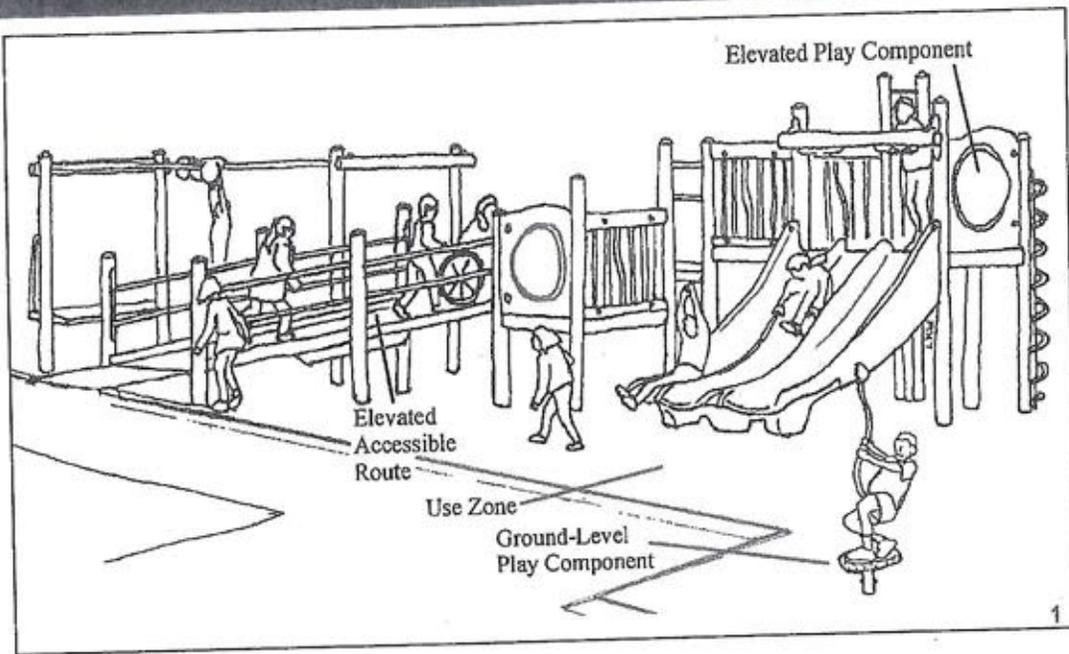
**Clear** – Unobstructed.

**Composite Play Structure** – Two or more play structures attached or functionally linked, to create one integral unit that provides more than one play activity (*ASTM F 1487-01*).

**Cross Slope** – The slope that is perpendicular to the direction of travel (*see running slope*).

**Elevated Play Component** – A play component that is approached above or below grade and that is part of a composite play structure consisting of two or more play components attached or functionally linked to create an integrated unit providing more than one play activity.





**Facility** – All or any portion of buildings, structures, site improvements, elements and pedestrian routes or vehicle ways located on a site.

**Ground Level Play Component** – A play component that is approached and exited at the ground level.

**Play Area** – A portion of a site containing play components designed and constructed for children.

**Play Component** – An element intended to generate specific opportunities for play, socialization, or learning. Play components may be manufactured or natural, and may be stand alone or part of a composite play structure.

**Ramp** – A walking surface that has a running slope of greater than 1:20.

**Running Slope** – The slope that is parallel to the direction of travel (*see cross slope*).

**Site** – A parcel of land bounded by a property line or a designated portion of a public right-of-way.

**Soft Contained Play Structure** – A play structure made up of one or more components where the user enters a fully enclosed play environment that utilizes pliable materials (e.g., plastic, netting, fabric).

**Use Zone** – The ground level area beneath and immediately adjacent to a play structure or piece of equipment that is designated by ASTM F 1487 Standard Consumer Safety Performance Specification for Playground Equipment for Public Use for unrestricted circulation. This is the play surface upon which it is predicted a user would land when falling from or exiting the equipment.



## WHERE DO THE PLAY AREA GUIDELINES APPLY?

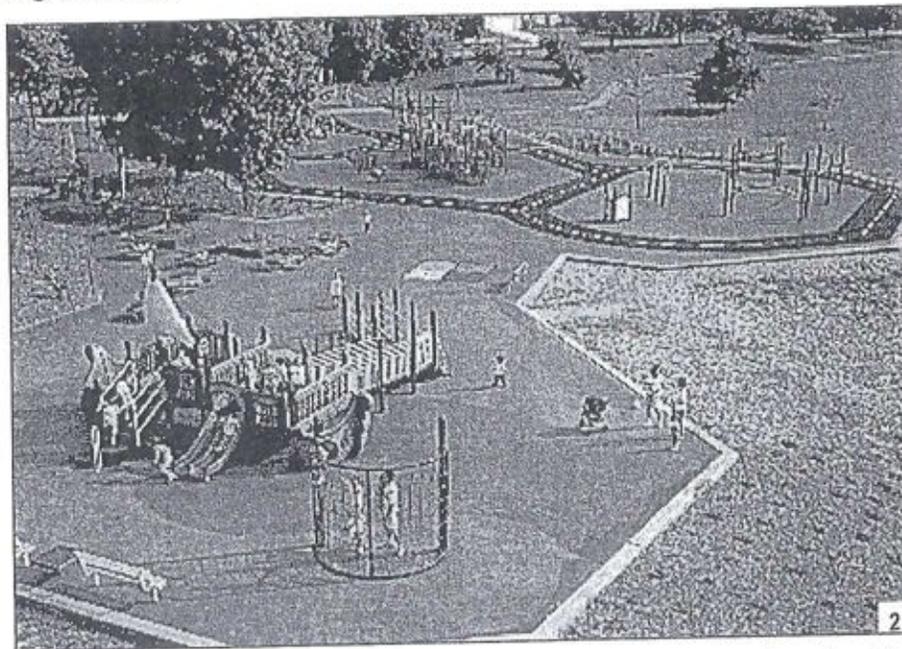
### New Construction

The play area guidelines in this guide apply to all newly designed or constructed play areas for children ages 2 and older.

This includes play areas located in a variety of settings: parks, schools, childcare facilities, shopping centers, and public gathering areas. Owners or operators of newly constructed play areas are responsible for complying with these guidelines.

The play area guidelines do not apply to:

- Family childcare facilities where the proprietor resides
- Amusement attractions
- Religious entities



This large play area designed for the same age group is part of a public park system. The total of all the play components in this play area - which includes multiple composite structures - must be counted when applying the play area guidelines.

### Alterations

The play area guidelines also apply to existing play areas where alterations occur. Further information regarding the application of the play area guidelines to altered play areas can be found on page 39.

### Equivalent Facilitation

Designs that result in products or technologies as alternatives to those prescribed, provided substantially equivalent or greater accessibility and usability.

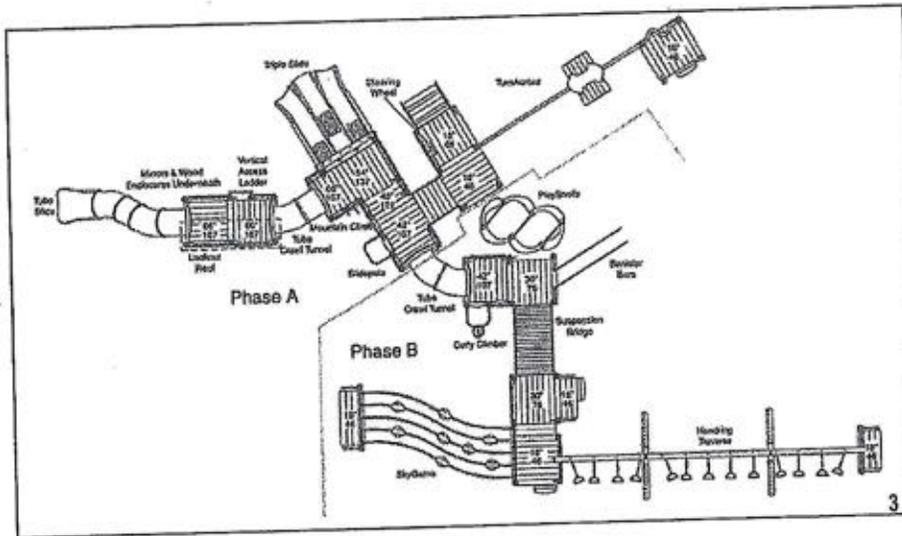
Equivalent facilitation is the concept of utilizing innovative solutions and new technology, design, or materials in order to satisfy the guidelines. These alternative solutions provide equal access and take advantage of new developments, but may differ technically from specific guidelines.



U.S. Access Board  
Summary of Accessibility  
Guidelines for Play Areas

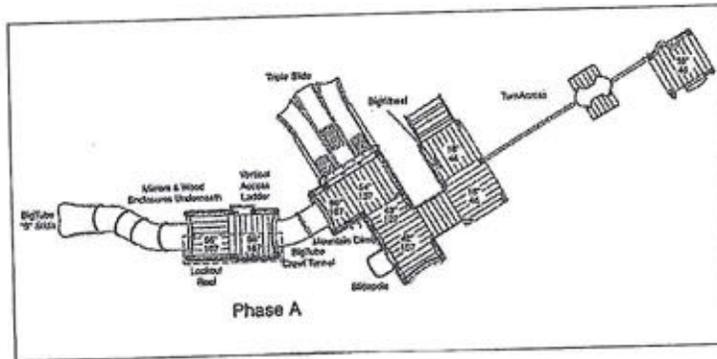
### Phasing in Play Areas

When play areas are constructed in phases, they must continue to meet the play area guidelines throughout construction. The initial phase area must meet the guidelines, and then at each successive phase the whole play area must be reassessed to assure compliance.

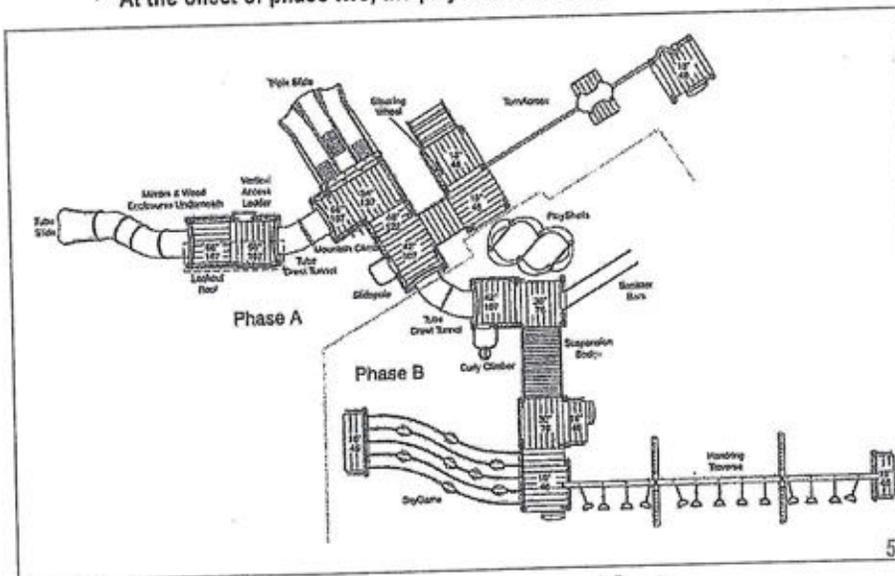


This play area will be installed in two phases. As each phase is completed, the entire play area must be reevaluated for compliance.

Prior to phase one, the first structure is evaluated for compliance, since the guidelines are based on a minimum number of play components required to be on an accessible route.



At the onset of phase two, the play area is reevaluated in its entirety.



"Phased designs" are play areas developed to be installed in different stages, allowing the play area to grow in a planned manner while accommodating budgets, fund raising, or community approval processes.

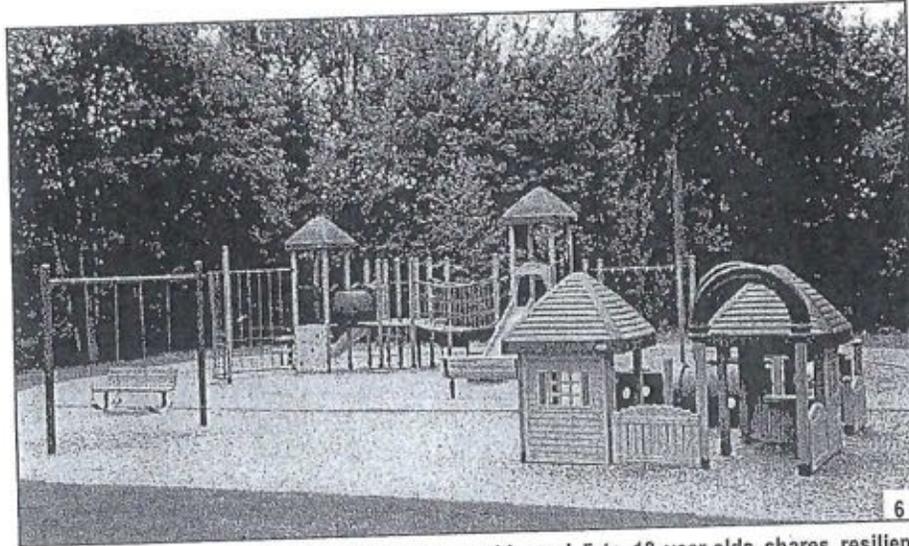


## WHERE DO THE PLAY AREA GUIDELINES APPLY?

### Play Areas Separated by Age

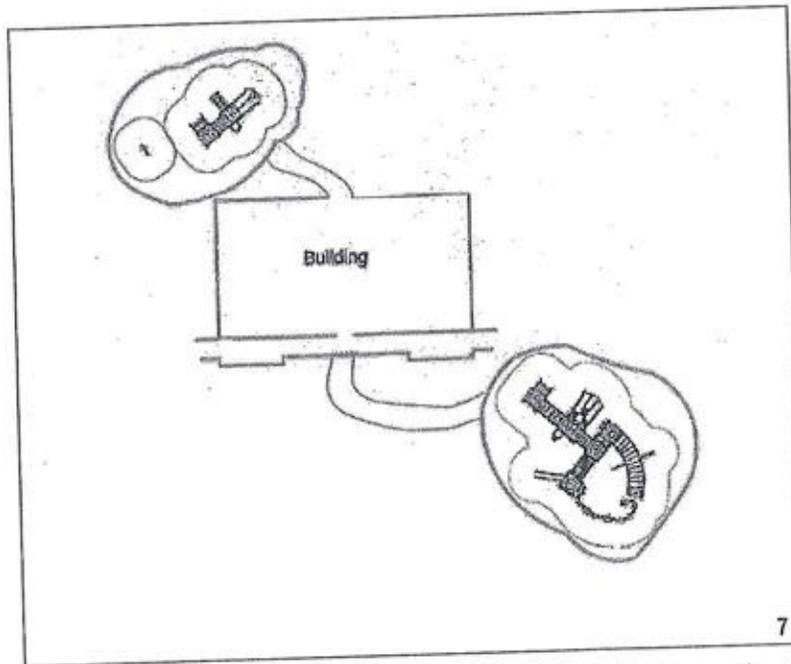
To reduce the risk of injury, safety guidelines recommend separate play areas for different age groups. In applying the guidelines, play areas designed for different age groups should be considered separately.

A play area designed for 2 to 5 year-olds is considered separate from one for 5 to 12 year-olds. Therefore, compliance with the guidelines must be considered for each individual play area.



This dual play area designed for 2 to 5 year-olds and 5 to 12 year-olds shares resilient surfacing. Each section must be evaluated separately.

### Geographically Separated Play Areas



Large geographical spaces may contain several play areas within one park setting. Where play areas are geographically separated on a site, they are considered separate play areas. The accessibility guidelines apply to each play area.



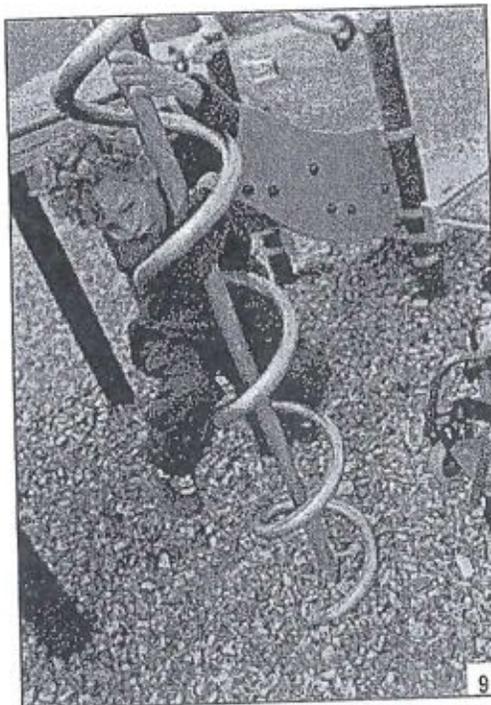
## Play Components

A play component is an element designed to generate specific opportunities for play, socialization, and learning. Play components may be manufactured or natural, and may stand alone or part of a composite play structure. Swings, spring riders, water tables, playhouses, slides, and climbers are among the many different play components.

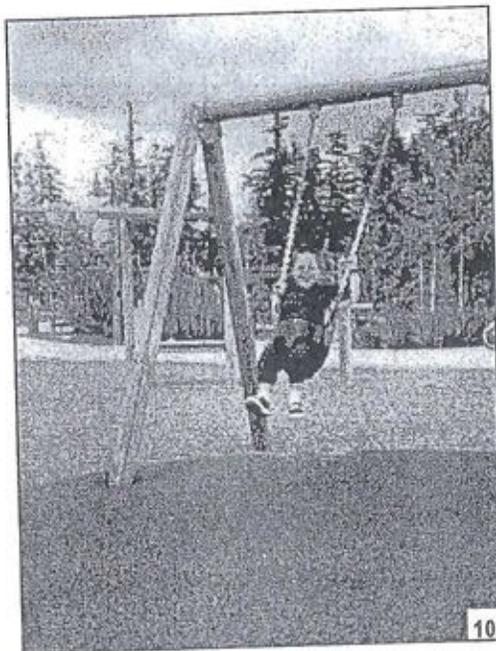
For the purpose of these guidelines, ramps, transfer systems, steps, decks, and roofs are not considered play components. These elements are generally used to link other elements on a composite play structure. Although socialization and pretend play can occur on these elements, they are not primarily intended for play.



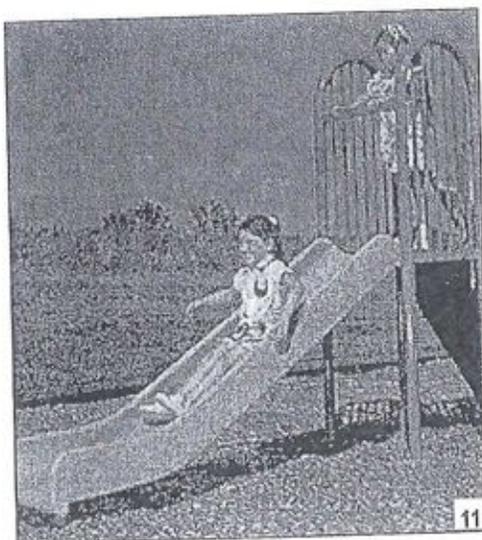
Spring rider



Climber



Swing



Slide



U.S. Access Board  
Summary of Accessibility  
Guidelines for Play Areas

## WHERE DO THE PLAY AREA GUIDELINES APPLY?

When applying the play area guidelines, it is important to identify the different play experiences play components can provide.

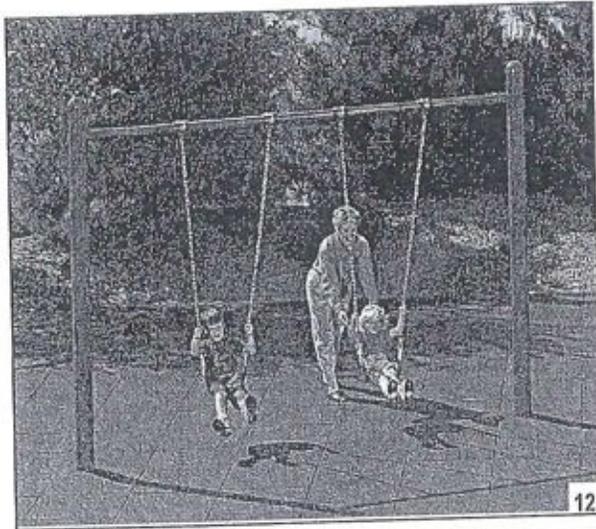
### Different "Types"

At least one of each type of play component provided at ground level in a play area must be on an accessible route.

Different "types" of play components are based on the general experience provided by the play component. Different types include, but are not limited to, experiences such as rocking, swinging, climbing, spinning, and sliding.

"Rocking" is an example of horizontal movement that can be backwards, forwards, sideways or even circular in nature.

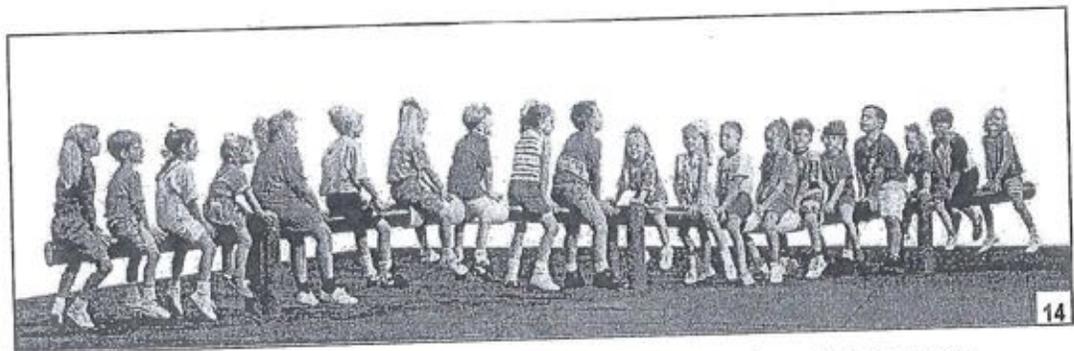
"Sliding" is an example of rapid descent that utilizes the force of gravity.



A Swinging Type



A Rocking Type

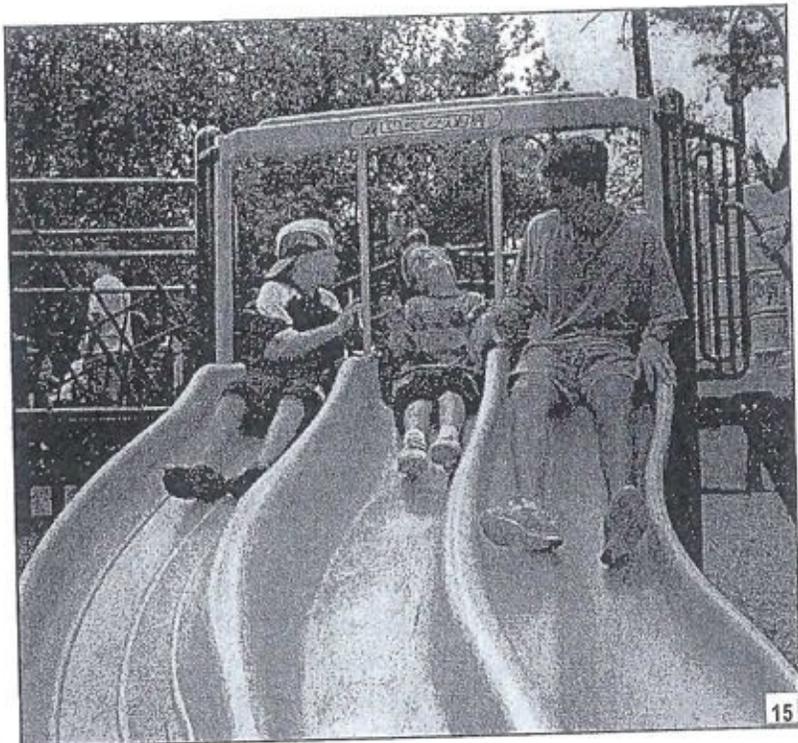


This single play component provides one type of play experience for multiple individuals.

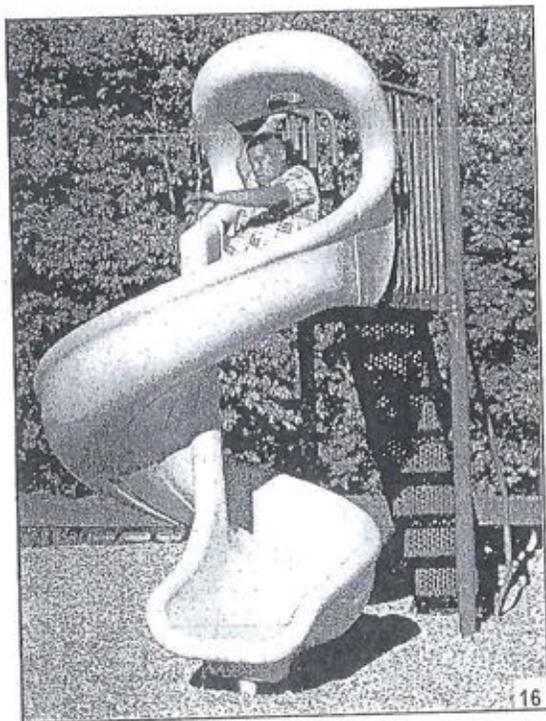


## WHAT IS A PLAY COMPONENT?

The number of individuals who can play on a play component at once does not determine the quantity of play components provided in a play area. A play component can hold many children but is considered one type of play experience - or one play component - in the play area.



Examples of Sliding Types



While a spiral slide provides a slightly different experience from a straight slide, the primary experience - a sense of rapid descent or sliding - is common to both activities. Therefore, a spiral slide and a straight slide are considered one "type" of play experience.

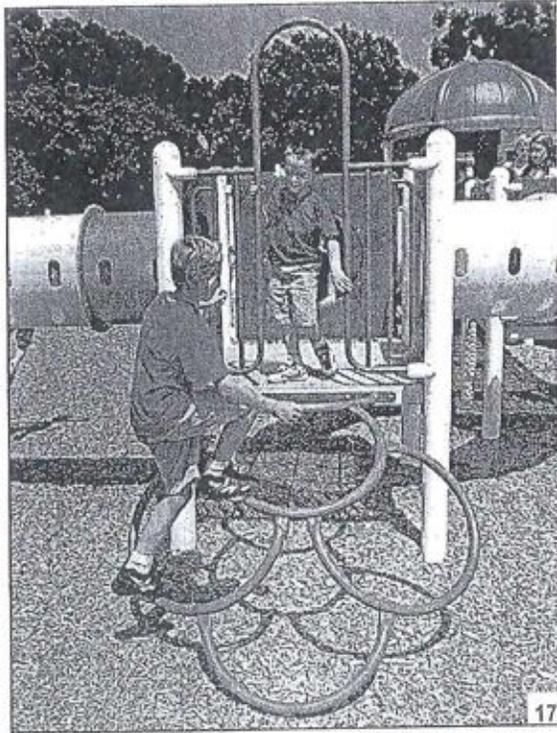


U.S. Access Board  
Summary of Accessibility  
Guidelines for Play Areas

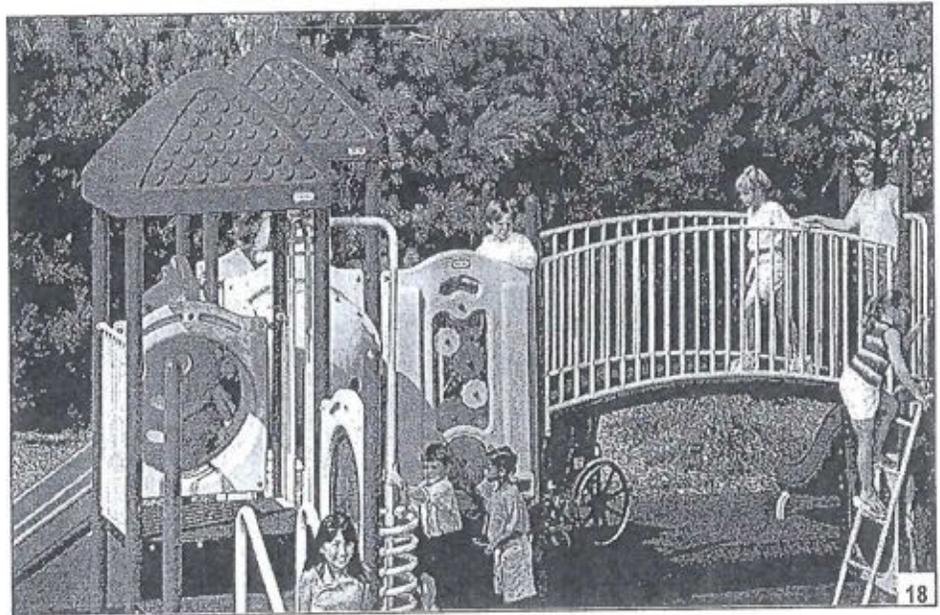
## WHAT IS A PLAY COMPONENT?

### Elevated Play Components

An elevated play component is a play component that is approached above or below grade and is part of a composite play structure. Play components that are attached to a composite play structure and that can be approached from a platform or deck area are considered elevated play components.

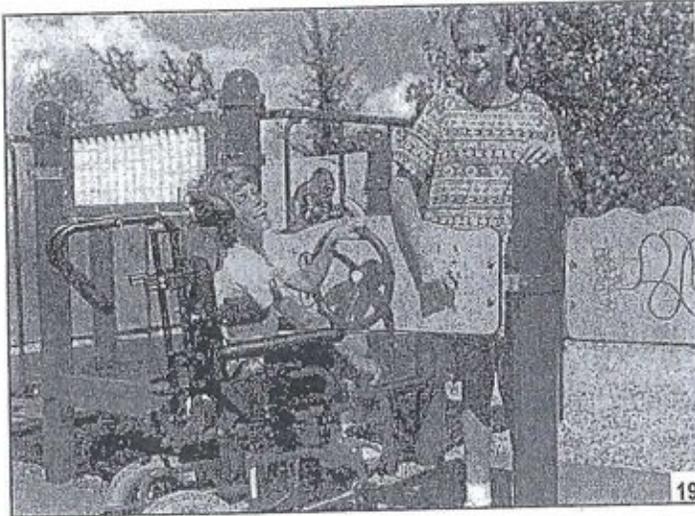


This climber is considered an elevated component, since it can be approached or exited from the ground level or above grade from a platform or deck on a composite play structure.

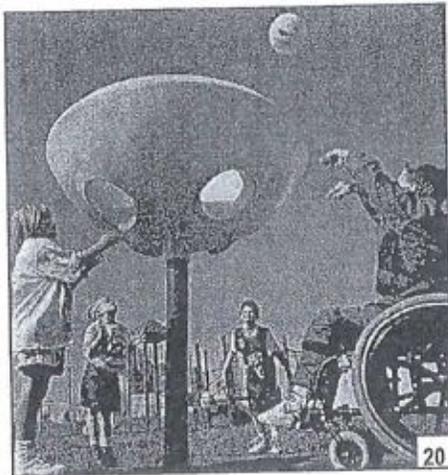


## Ground-Level Play Components

Ground-level play components are items that can be approached and exited at ground level. For example, a child approaches a spring rider at ground level via the accessible route. The child may ride then exit directly back onto the accessible route. The activity is considered ground level because the child approaches and exits it from the ground-level route.



Ground-level play components may be part of a composite structure.



Ground-level components may also be free-standing in a play area.

When more than one ground-level play component is required on an accessible route, the play components must be integrated. Designers should consider the optimal layout of ground-level play components to foster interaction and socialization among all children. Grouping all ground-level play components accessed by children with disabilities in one location does not constitute integration.

*"Ground-level components" are approached and exited at ground level.*

*Ground-level play components may include items such as swings, spring riders, and panels.*

*Freestanding slides are considered ground-level components for the purpose of these guidelines. An accessible route must connect to the ladder or steps, and to the exit of the slide. While this solution does not provide access for all children, it gives many individuals the opportunity to access play components.*



### Ground-Level Play Components

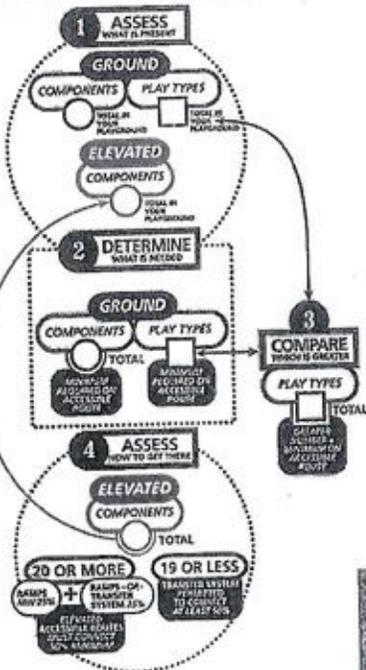
There are two requirements addressing how many ground-level play components must be on an accessible route:

- One of Each Type
- Ground-Level Requirements based on the number of Elevated Play Components

#### One of Each Type

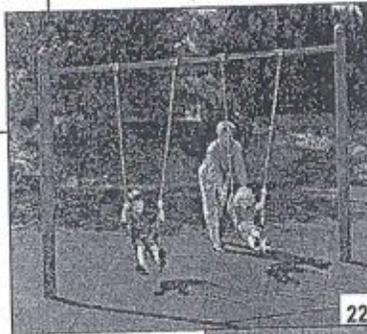
At least one of each type of ground-level play component that is present in the play area must be on an accessible route.

As an example, this play area includes a composite play structure, two spring riders and a swing set (see inset). To meet the requirement, an accessible route must connect to at least one spring rider and one swing for one of each type of ground-level play experiences which are present in the play area.

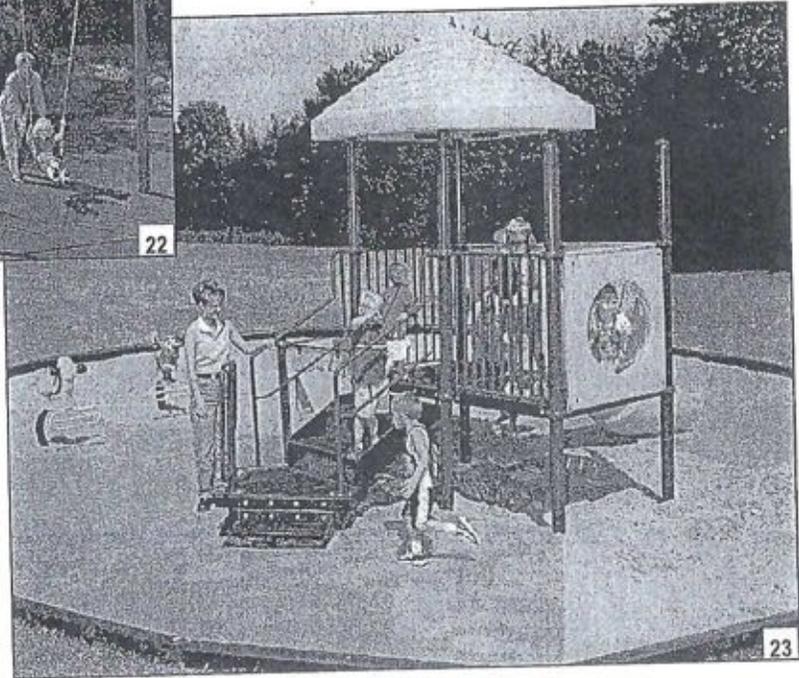


The above step-by-step guide is intended to assist when applying the play area guidelines. A detailed description is provided on page 17.

A "ground-level play component" is a play component that is approached and exited at the ground level.



22



23



# HOW MANY PLAY COMPONENTS MUST BE ON AN ACCESSIBLE ROUTE?

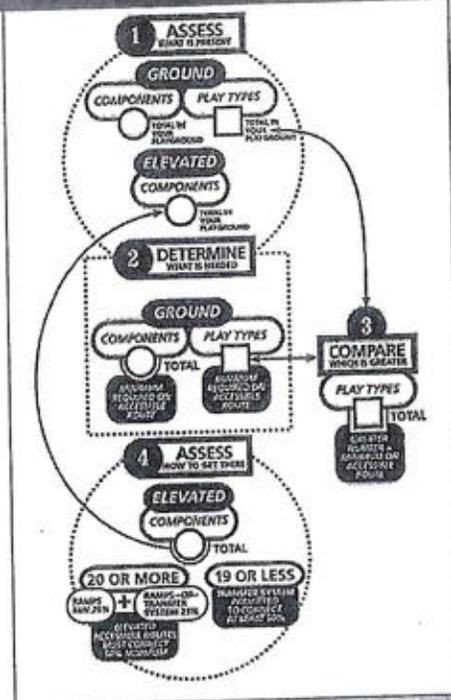
## Ground Level Requirements Based on Elevated Play Components

The number and variety of ground-level play components required to be on an accessible route is also determined by the number of elevated components provided in the play area.

The intent of this requirement is to provide a variety of experiences for individuals who choose to remain with their mobility aids, or choose not to transfer to elevated play components.

**Table 240.2.1.2**

Number of elevated play components provided	Minimum number of ground-level play components required to be on accessible route	Minimum number of different types of ground-level play components required to be on accessible route
1	Not applicable	Not applicable
2 to 4	1	1
5 to 7	2	2
8 to 10	3	3
11 to 13	4	3
14 to 16	5	3
17 to 19	6	3
20 to 22	7	4
23 to 25	8	4
More than 25	8 plus 1 for each additional 3 over 25, or fraction thereof	5



If ramps provide access to at least 50 percent of the elevated play components - which must include at least three different play types - then additional ground-level components are not required.

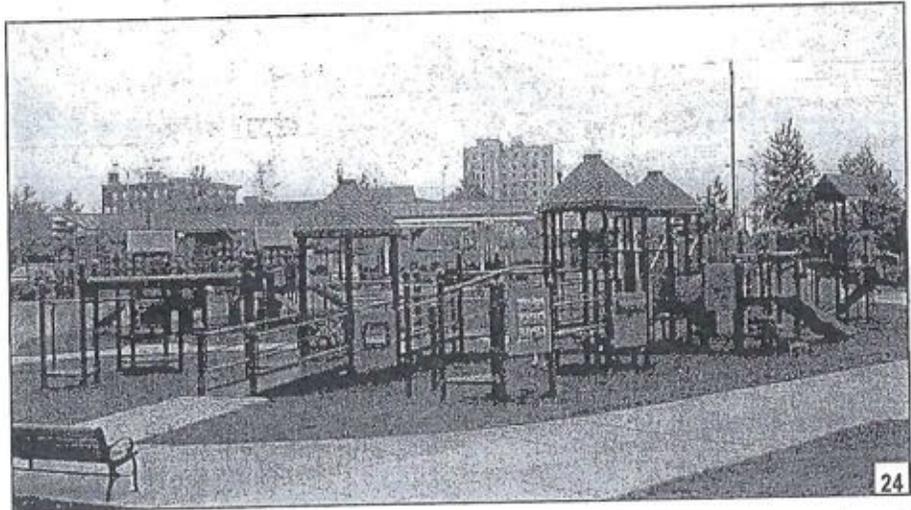
In the play area shown on page 14, the composite structure has four elevated play components (bubble panel, slide, steering wheel, and tic-tac-toe panel). According to the table, a minimum of one ground level play component must be provided, and a minimum of one different type. The spring rider or swing can be used to meet the "one of each type" requirement and can also be used to meet the minimum number determined by Table 240.2.1.2.



U.S. Access Board  
Summary of Accessibility  
Guidelines for Play Areas

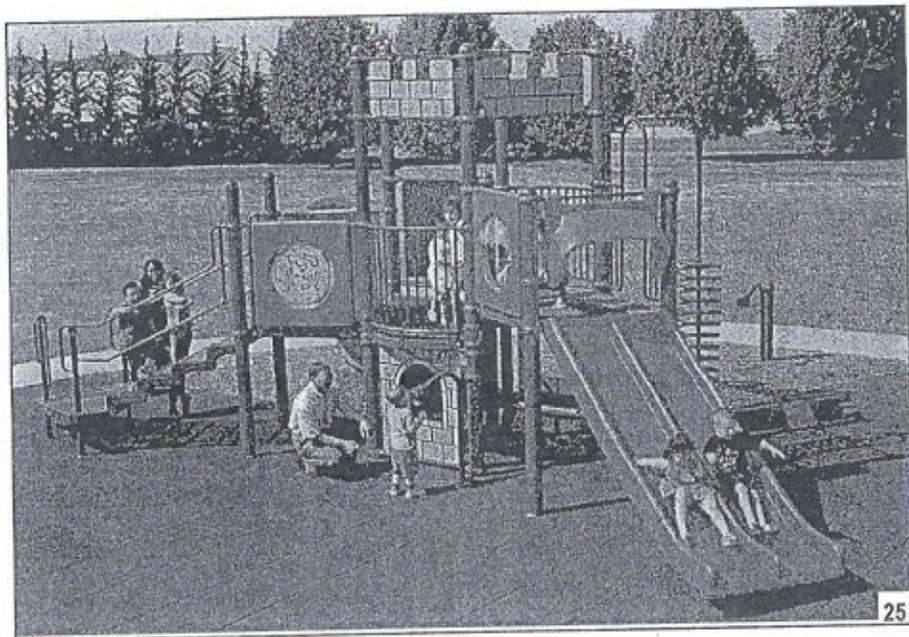
### Elevated Play Components

At least 50 percent of the elevated play components must be on an accessible route.



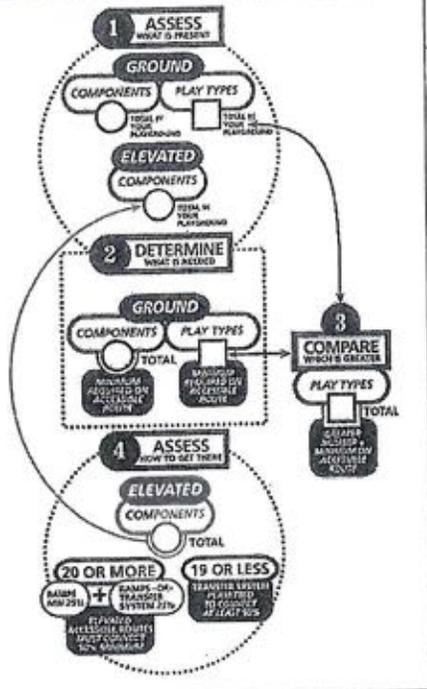
24

Play areas with 20 or more elevated components must use ramps to connect a minimum of 25 percent of those components. A transfer system or ramps may connect the other elevated play components required on an accessible route.



25

Play areas with less than 20 elevated play components may use a transfer system instead of ramps to connect at least 50 percent of the elevated components.



The above step-by-step guide is intended to assist when applying the play area guidelines. A detailed description is provided on page 17.

An "elevated play component" is a play component reached from above or below grade, and is part of a composite play structure.

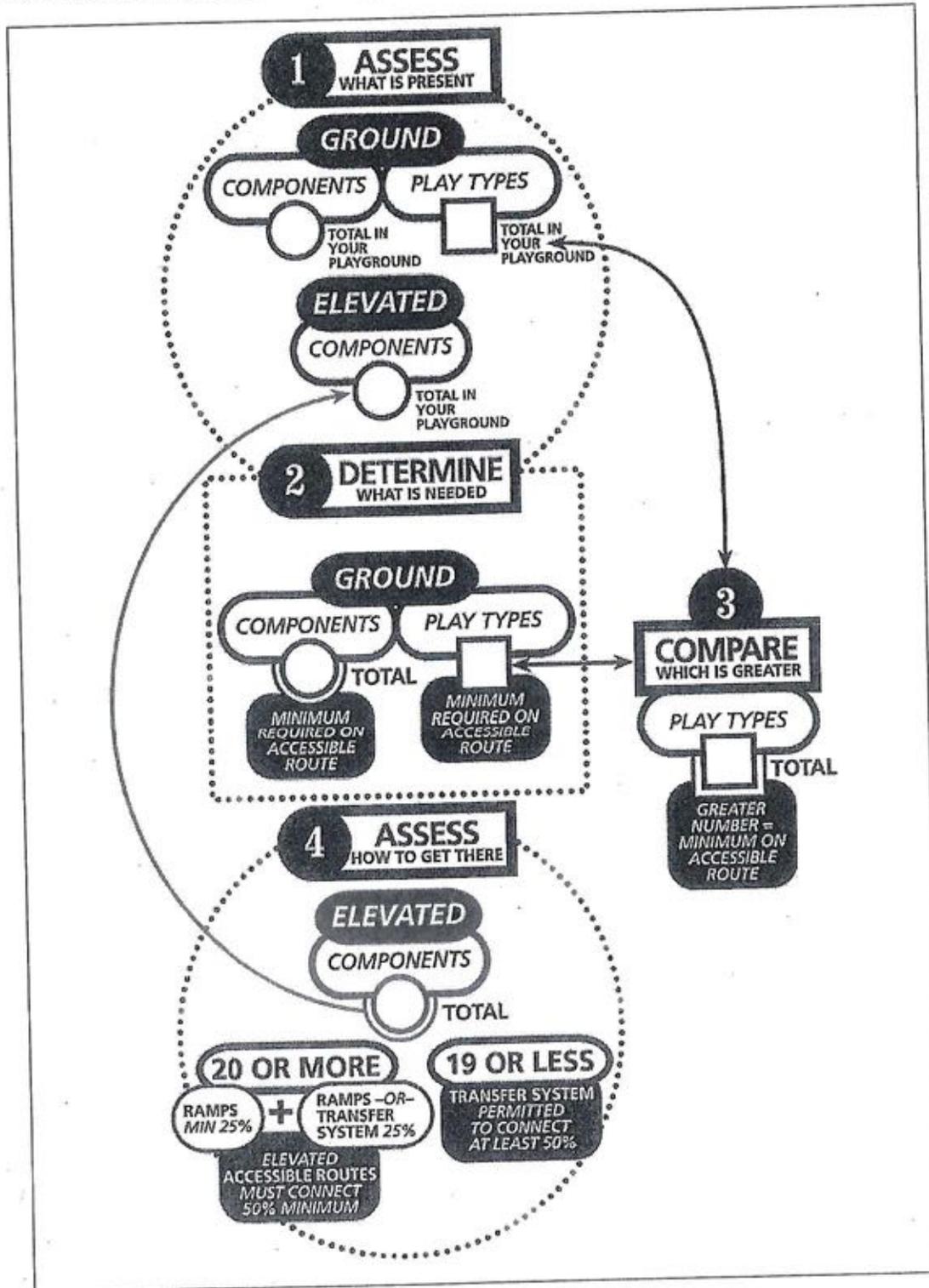


# STEP-BY-STEP GUIDE ON APPLYING GUIDELINES

## Step-by-Step Guide

The following step-by-step guide has been provided to assist in evaluating a play area for meeting the minimum requirements of these guidelines. The guide has been arranged in four steps and provides spaces to fill in numeric values of play components for evaluating a specific play area design.

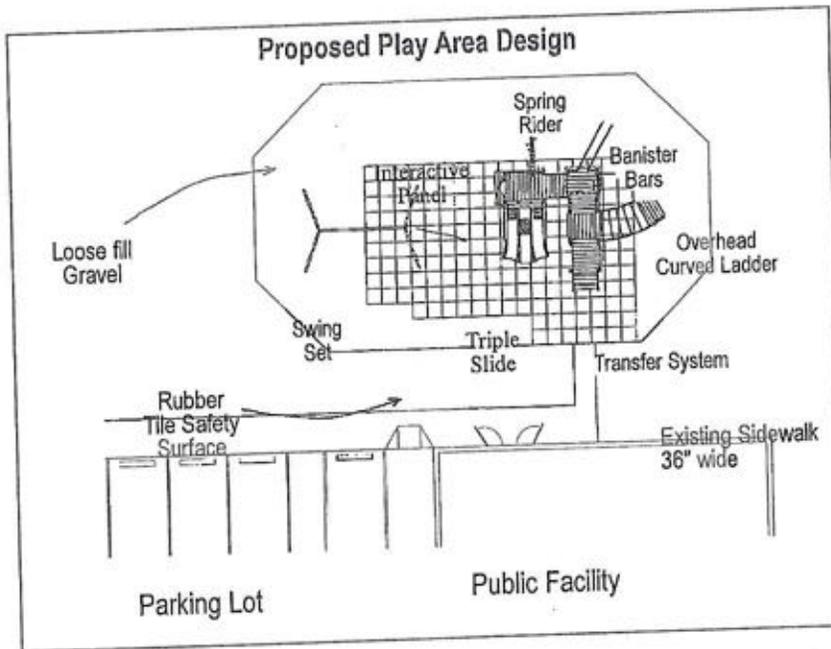
The step-by-step guide is used throughout the remainder of this guide as a key, shown in the upper corner of each new section where it applies.



U.S. Access Board  
A Summary of Accessibility  
Guidelines for Play Areas

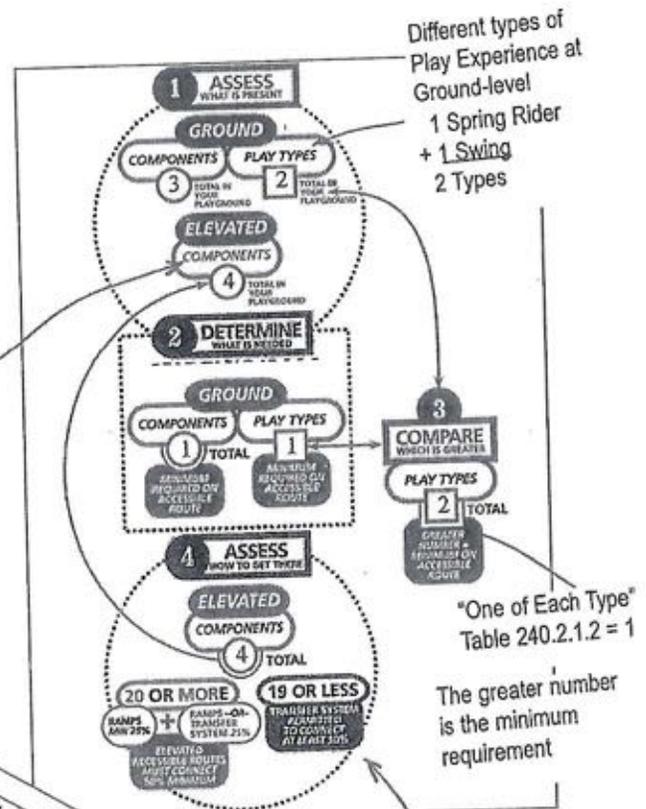
# PLAY AREA EVALUATION EXAMPLE

The example below illustrates a proposed design for a new play area. Each section illustrated in the flow chart provides guidelines for the following design tasks:



- Determining the number of play components
- Assessing the variety of play types
- Determining how many play components must be on an accessible route
- Determining when ramps are required and when transfer systems are permitted

Refer to this example while reviewing the concepts explained in this guide, to review how accessibility guidelines are applied to play area designs.



Total # of elevated components  
 1 Triple Slide  
 1 Interactive Panel  
 1 Overhead Curved Ladder  
 + 1 Banister Bars  
4 total

Different types of Play Experience at Ground-level  
 1 Spring Rider  
 + 1 Swing  
 2 Types

"One of Each Type"  
 Table 240.2.1.2 = 1

The greater number is the minimum requirement

50% of 4 elevated components = 2 elevated components

**Table 240.2.1.2**

Number of elevated play components provided	Minimum number of ground-level play components required to be on accessible route	Minimum number of different types of ground-level play components required to be on accessible route
1	Not applicable	Not applicable
2 to 4	1	1
5 to 7	2	2
8 to 10	3	3
11 to 13	4	4
14 to 16		
17 to 19		
20 to 22		



U.S. Access Board  
 Summary of Accessibility  
 Guidelines for Play Areas

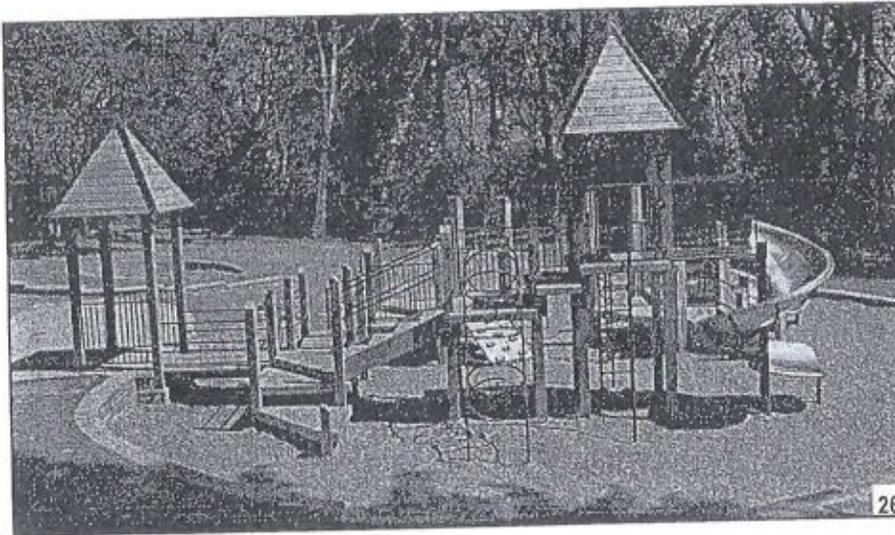
## WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?

ADAAG chapter 4 addresses accessible routes that connect the play area to the school, parking lot, or facility that it serves. Operators or owners of play areas are subject to all the other requirements of the ADA, including the obligation to provide individuals with disabilities an equal opportunity to enjoy the play area provided by that facility.

*This section describes the various features of accessible routes within a play area, including location, clear width, slope, and accessible surfaces.*

### Accessible Routes

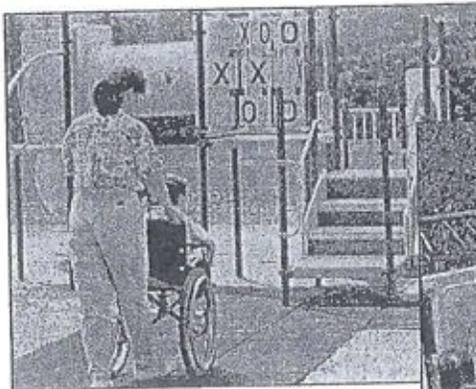
An accessible route is a pathway specifically designed to provide access for individuals with disabilities, including those using wheelchairs or mobility devices.



Accessible routes inside the boundaries of play areas are addressed in the play area guidelines. Technical provisions address the width, slope, and surface of both ground-level and elevated accessible routes.

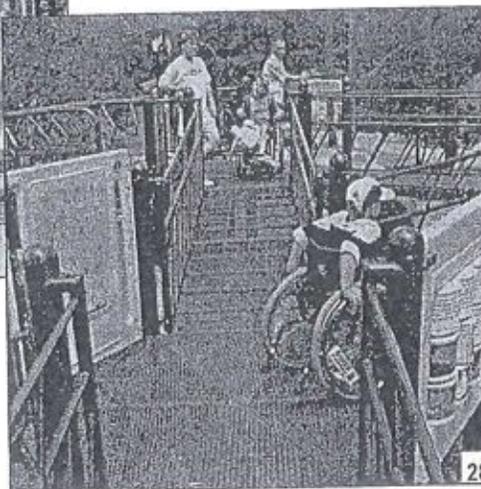
There are two types of accessible routes:

- Ground-level
- Elevated



This ground-level route connects ground components and the transfer system which connects elevated components.

This elevated route connects elevated play components on a composite structure.



*The accessible route must connect all entry and exit points of accessible play components.*

*Clear floor space required at play components and maneuvering space can overlap the accessible route.*

*Incorporating additional circulation space around high-use play components creates extra room for movement and accessibility for everyone using the play area.*



U.S. Access Board  
A Summary of Accessibility  
Guidelines for Play Areas

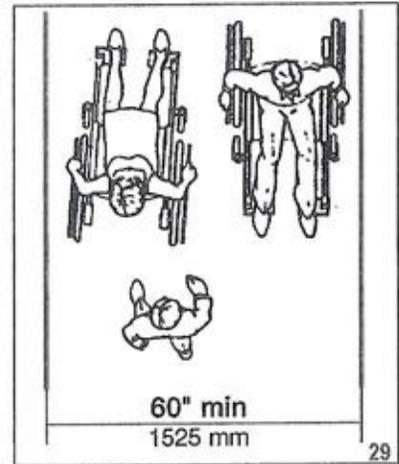
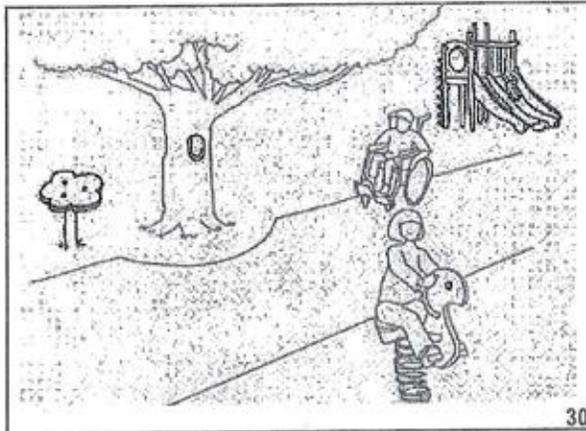
### Ground-Level Accessible Routes

The 80-inch vertical clearance applies to ground-level routes only, and not elevated routes. This allows features like protective roofs and sun shelters to be present.

A ground-level accessible route connects play components at ground level.

- 60 inches (1525 mm) minimum clear width
- 1:16 maximum slope

The route may narrow down to 36 inches (915 mm) for a distance of 60 inches (1525 mm). This permits flexibility to work around site design features like existing equipment or trees.

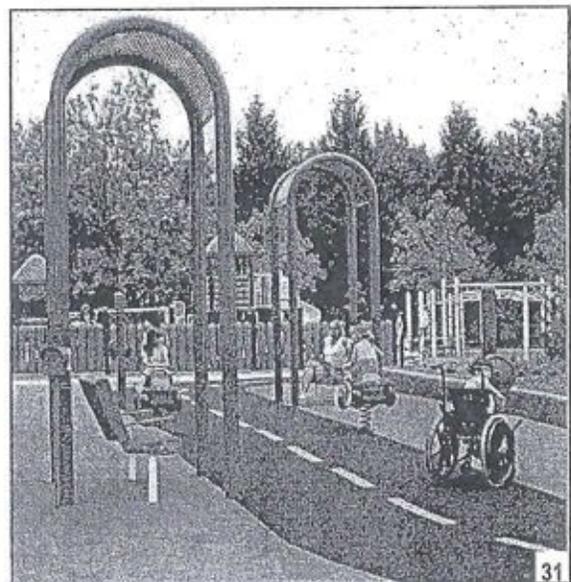


The required 60-inch width enables two wheelchairs to pass each other or to change direction.

Smaller play areas - those that are less than 1,000 square feet (304.8 square meters) - may have ground-level accessible routes that are 44 inches (1120 mm) clear width. A wheelchair turning space must be provided where the route exceeds 30 feet (9.14 mm) in length.

At ground level, objects may not protrude into the 60-inch wide space of an accessible route up to or below the height of 80 inches (2030 mm), measured above the accessible route surface. The 80-inch clearance applies only to the 60-inch accessible route, and is not required for the entire play area.

The play area provides a fun accessible roadway theme. The protective shelters for the benches have been set outside the boundary of the route providing the 80 inches of clearance required on the route.



## WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?

### Ground-Level Accessible Routes

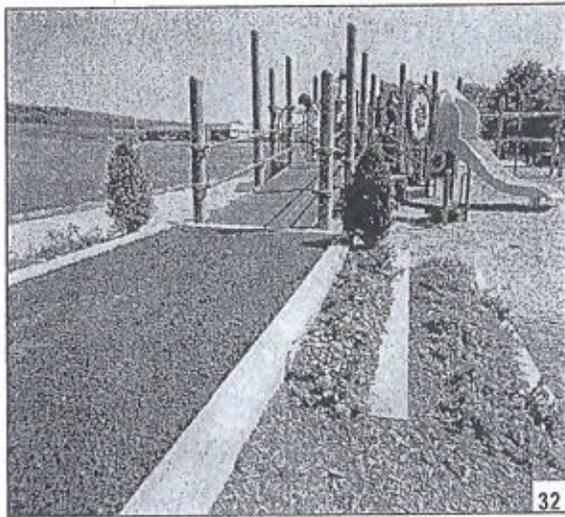
#### Maximum Slope at Ground Level

The maximum allowable slope for a ground-level accessible route is 1:16.

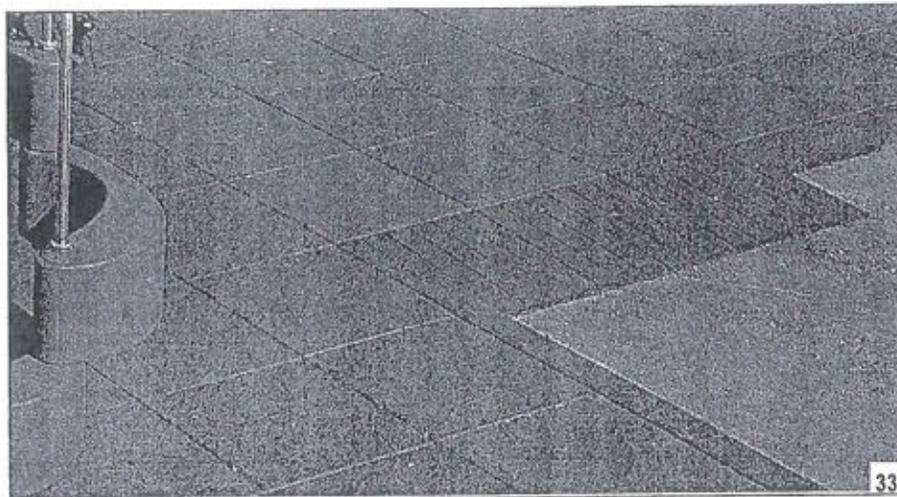
Berms are sometimes used to provide access to elevated play areas. A berm may be a natural sloped surface that is present in a hilly play area site, or a ground-level route built with slopes.

Designers are encouraged to consider edge protection and handrails on berms where there may be a drop-off. Remember the maximum slope of this "ground-level accessible route" is 1:16.

However, handrails are not required on ground-level accessible routes. This is permitted since the handrails may become a safety hazard in the "use zone."



This play area provides a bermed accessible route.



To accommodate a height change along the perimeter of a play area - like these rubber safety tiles placed on an asphalt surface - an allowable 1:12 slope is utilized for the transition at the boundary of the play area.



U.S. Access Board  
A Summary of Accessibility  
Guidelines for Play Areas

### Accessible Ground Surfaces

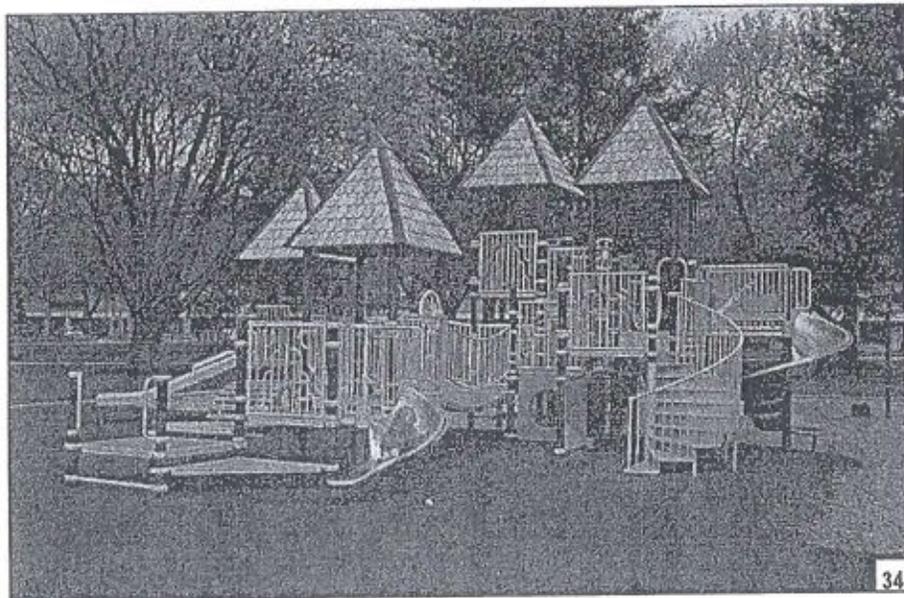
The "use zone" is a ground level area beneath and immediately adjacent to a play structure or piece of equipment that is designated for unrestricted circulation around the equipment. It is predicted that a user would fall and land or exit the equipment on the surface of the use zone.

The American Society for Testing and Materials (ASTM) has established safety standards for play areas, including resilient surfaces. For further information or to purchase these standards, contact ASTM, 100 Barr Harbor Drive, West Conshohocken, PA 19428-2959, [www.astm.org](http://www.astm.org).

Ground surfaces along accessible routes, clear floor or ground spaces, and maneuvering spaces, must comply with the American Society for Testing and Materials (ASTM) F 1951-99 *Standard Specification for Determination of Accessibility to Surface Systems Under and Around Playground Equipment*.

This standard assesses the accessibility of a surface by measuring the work an individual must exert to propel a wheelchair across the surface. The standard includes tests of effort for both straight-ahead and turning movements, using a force wheel on a rehabilitation wheelchair as the measuring device. To meet the standard, the force required must be less than that which is required to propel the wheelchair up a ramp with a slope of 1:14.

When selecting ground surfaces, operators should request information about compliance with the ASTM F 1292-04 standard.



Accessible surfaces can include impact-attenuating tiles made of recycled rubber and engineered wood fiber that meet the ASTM requirements for accessibility and safety. The design can be created so safety is not compromised for individuals using the play area where both standards are applied.

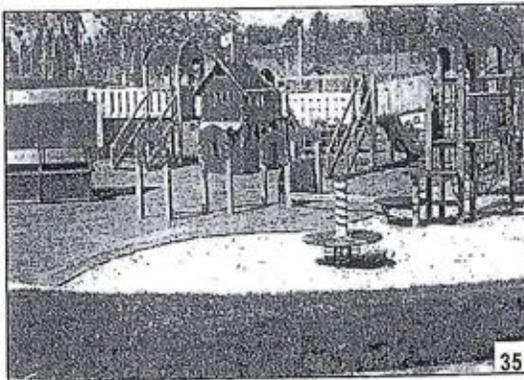
### Accessible Surfaces Located In The Use Zone

If located within the use zone, accessible ground surfaces must also be impact attenuating and meet ASTM F 1292-04 *Standard Specification for Impact Attenuation of Surface Systems Under and Around Playground Equipment*.

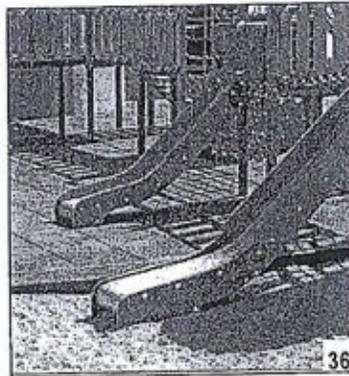


U.S. Access Board  
A Summary of Accessibility  
Guidelines for Play Areas

## WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?



Accessible and non-accessible surfaces can be combined to provide variety and excitement in the play area.



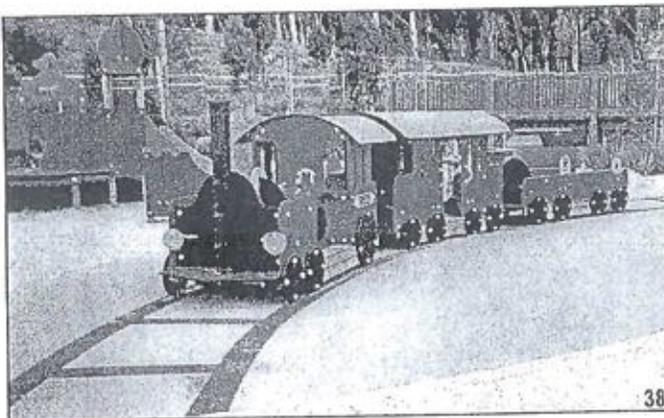
At the time of this publication, rubber surfacing and some engineered wood fiber products meet the ASTM F 1951-99 standard. The fact that a specific product meets the ASTM 1951-99 standard does not necessarily mean that all other similar products will meet the standard.

Operators interested in selecting surfaces to comply with the play area guidelines, should consult individual product manufacturers to determine compliance with ASTM F 1951-99.



Rubber surfacing tiles facilitate access in this play area.

Ground surfaces must be inspected and maintained regularly and frequently to ensure continued compliance with the ASTM F 1292-04 standard. The frequency of maintenance and inspection of resilient surfacing depends on the amount of use and the type of surfacing installed.



Accessible surfacing can be designed to complement the theme of the play area, while providing full access and visually integrating the surface into the overall design. Individuals of all abilities will enjoy the added benefits of an imaginative design.

Engineered wood fiber surfaces will require frequent maintenance to comply with the ASTM F 1292-04 standard because of surface displacement due to user activity or other factors.

Designers and operators are likely to choose materials that best serve the needs of each play area. The type of material selected will affect the frequency and cost of maintenance.



U.S. Access Board  
A Summary of Accessibility  
Guidelines for Play Areas

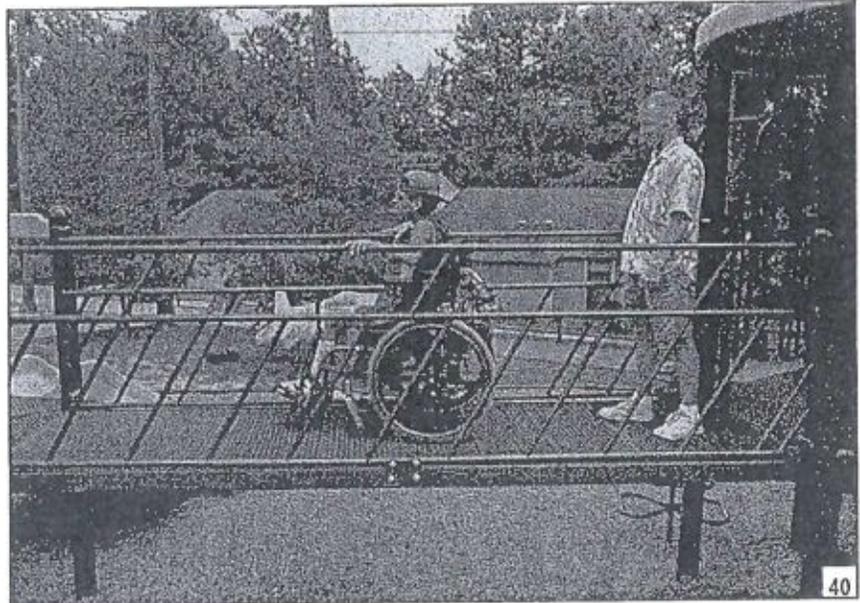
### Elevated Accessible Routes

An elevated accessible route is the path used for connecting elevated play components.

Elevated accessible routes must connect the entry and exit points of at least 50 percent of the elevated play components provided in the play area.

Two common methods for providing access to elevated play components are ramps and transfer systems. Ramps are the preferred method since not all children who use wheelchairs or other mobility devices may be able to use - or may choose not to use - transfer systems.

"Ramps" serve as a continuation of the accessible route from the ground allowing individuals who use mobility devices to access elevated components. The guidelines require that play areas containing 20 or more elevated play components provide ramp access to at least 25 percent of those elevated components.



This photo illustrates an elevated accessible route:

- 36-inch (915 mm) clear width
- 32-inch (815 mm) narrowed width permitted for 24-inch (610 mm) length to accommodate features in the composite structure
- 12-inch (305 mm) rise maximum per ramp run
- Top of handrail gripping surfaces shall be 20 inches (510 mm) minimum to 28 inches (710 mm) maximum above the ramp surface



The 80-inch vertical clearance height does not apply to elevated accessible routes. This allows for the use of features such as roofs and sun shelters.



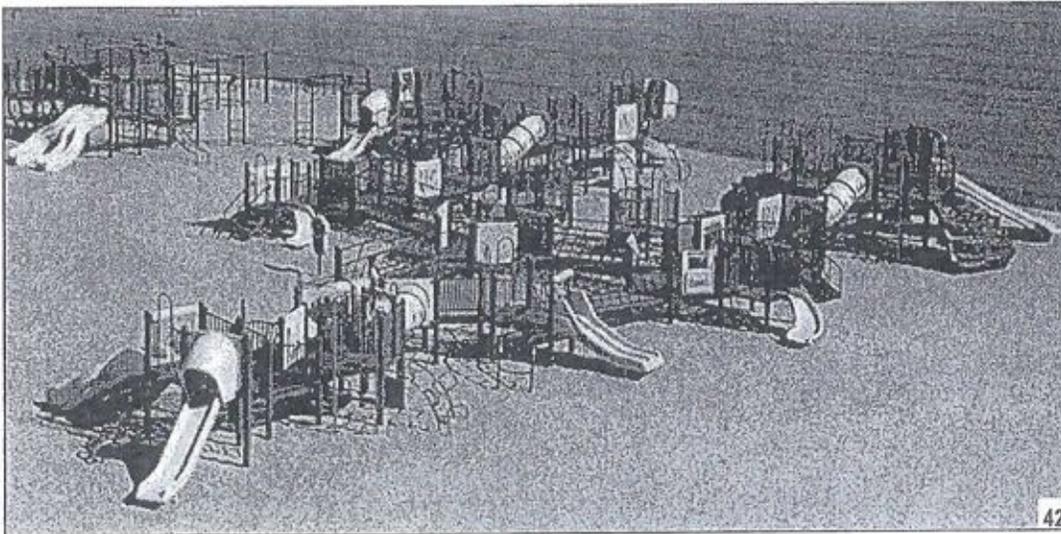
U.S. Access Board  
A Summary of Accessibility  
Guidelines for Play Areas

## WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?

### When Ramps Are Required

Ramps are required on composite structures with 20 or more elevated play components and must connect to at least 25% of the elevated play components.

Ramps allow individuals who use wheelchairs and mobility devices to access elevated play components in composite play structures without transferring.



This play area has more than 20 play components and provides ramp access to elevated play components. The ramp system, consisting of ramp runs and landings, must connect at least 25 percent of the elevated play components. The balance of the elevated play components required to be on an accessible route may be connected by the ramp system, or by a transfer system.

Rise of a ramp is the amount of vertical distance the inclined or slanted surface ascends or descends. A ramp run is a length of a continuous sloped surface that is ascending or descending. For example, to reach a 12-inch high deck or platform, a designer could use a 12-foot ramp with the maximum 1:12 slope, or a 14-foot ramp with a less steeper 1:14 slope.

*Platform lifts, also known as "wheelchair lifts," may be considered for providing access to elevated play components when appropriate.*

*Where applicable, platform lifts complying with ADA/ABA Accessibility Guidelines chapter 4 and applicable state and local codes are permitted as a part of an accessible route. Because lifts must be independently operable, owners and operators should carefully consider the appropriateness of their use in unsupervised settings.*



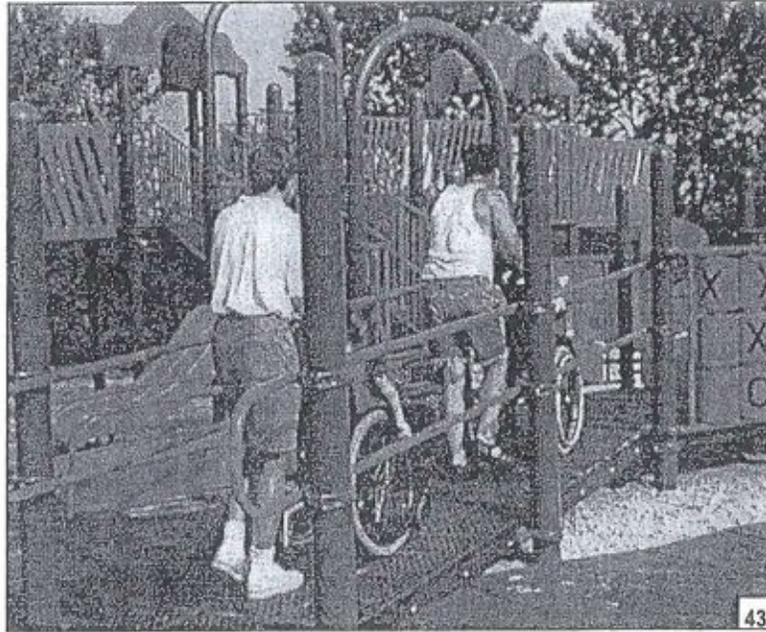
U.S. Access Board  
A Summary of Accessibility  
Guidelines for Play Areas

"Ramps" are sloped surfaces that provide individuals who use mobility devices with access to elevated components.

### Ramps

For each elevated ramp run:

- 12-inch (305 mm) maximum rise
- 1:12 maximum slope
- 36-inch (915 mm) minimum clear width



### Landings

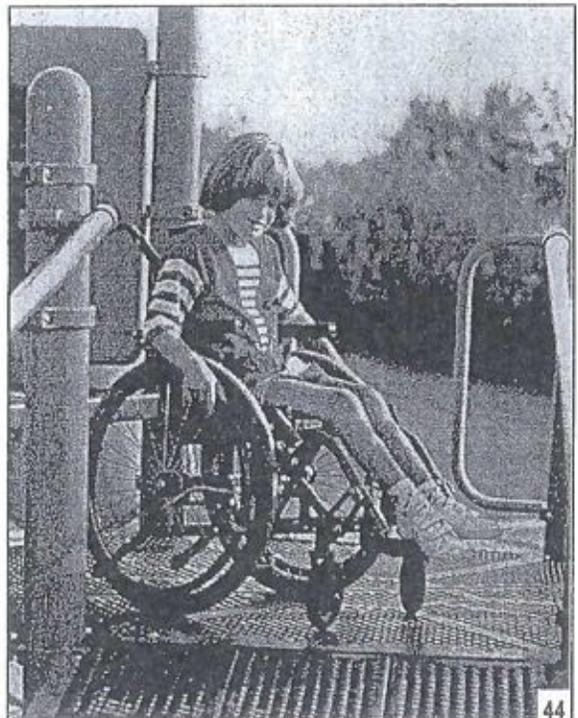
Landings are the level surfaces at the top and bottom of each ramp run.

- Must be as wide as the ramp they connect to
- A minimum length of 60-inches (1525 mm)
- If ramps change direction, the minimum landing size must be 60 inches (1525 mm) wide to accommodate a turn

### Maneuvering Space Where Ramps are Provided

At least one maneuvering space must be provided on the same level as the play component. The space must have a slope no steeper than 1:48 in all directions (see page 34 for further details).

ADA/ABA Accessibility Guidelines addresses additional requirements for ramps and landings including edge protection, cross slope, surfaces, and outdoor conditions.



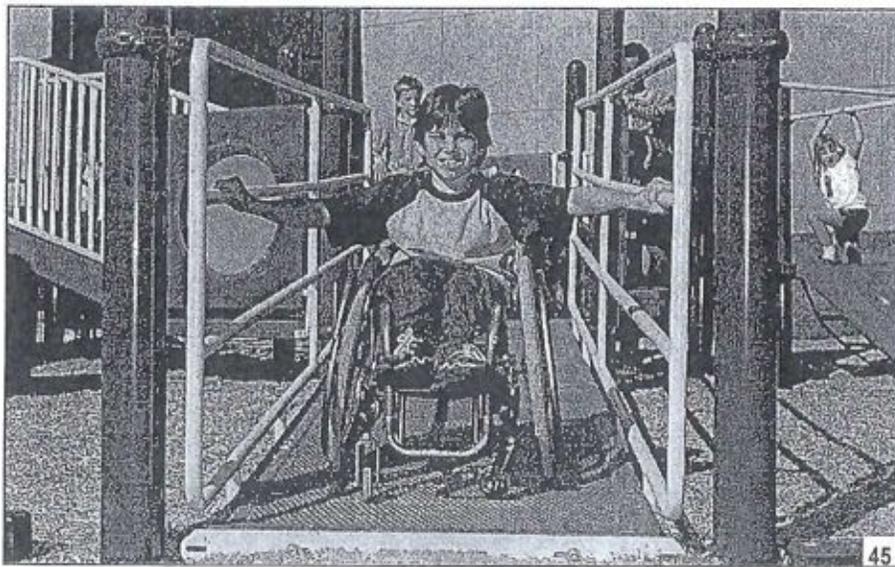
U.S. Access Board  
A Summary of Accessibility  
Guidelines for Play Areas

## WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?

### Handrails

Handrails are required on both sides of ramps connecting elevated play components. Handrails must comply with the following:

- Clearance between handrail gripping surfaces and adjacent surfaces shall not be 1 1/2 inches (38mm) minimum.
- Handrail gripping surfaces shall be continuous along their length and shall not be obstructed along their tops or sides. The bottoms of handrail gripping surfaces shall not be obstructed for more than 20 percent of their length. Where provided, horizontal projections shall occur 1 1/2 inches (38mm) minimum below the bottom of the handrail gripping surface.



In this case, additional handrails have been provided.

Handrails are required to comply with ADA/ABA 505. However, extensions on handrails in the play area are not required. This is to prevent children running into protruding rails in the play area.



U.S. Access Board  
A Summary of Accessibility  
Guidelines for Play Areas

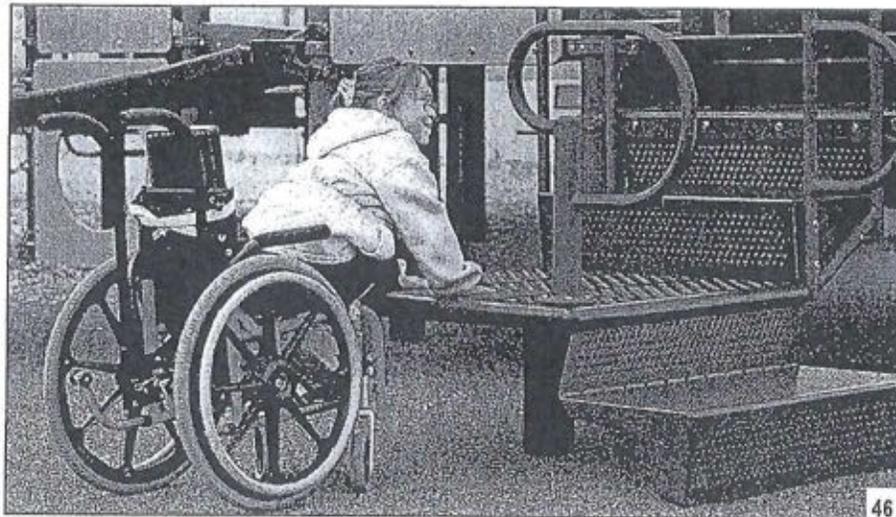
### When Transfer Systems Are Used

A transfer system provides access to elevated play components within a composite system by connecting different levels with transfer platforms and steps.

A transfer system provides access to elevated play components without the use of a wheelchair or mobility device. At least 50% of the elevated play components can be connected by a transfer system in play areas with less than 20 elevated components. In play areas with 20 or more elevated play components, transfer systems may be used to connect up to 25% of the elevated play components and the rest of the elevated play components required to be on an accessible route must be connected by a ramp.

A "transfer system" is an alternative to a ramp system in play areas where there are less than 20 total elevated play components.

The transfer system must connect to the ground-level accessible route and provide access to at least 50 percent of the elevated play components.



A transfer system typically consists of a transfer platform, transfer steps, and transfer supports.

Where a transfer system is provided, a combination of transfer platforms and transfer steps provide a continuous accessible route to elevated play components. A transfer system provides individuals the space necessary to physically transfer up or down in a composite play structure. Where provided, a 24-inch (610 mm) minimum width is necessary for individuals moving around a structure.



Playful features can be part of the transfer system, providing interactive experiences from both an elevated or ground level approach.

Consider the distance someone must travel to reach play components accessed by transfer systems. On page 31, the illustration shows a transfer system placed directly next to the slide. Access to this type of elevated play component has been carefully designed to minimize the distance someone must transfer to reach it.



## WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?

### Transfer Platforms

A transfer platform is a platform or landing that an individual who uses a wheelchair or mobility device can use to lift or transfer onto the play structure and leave the wheelchair or mobility device behind at ground-level.

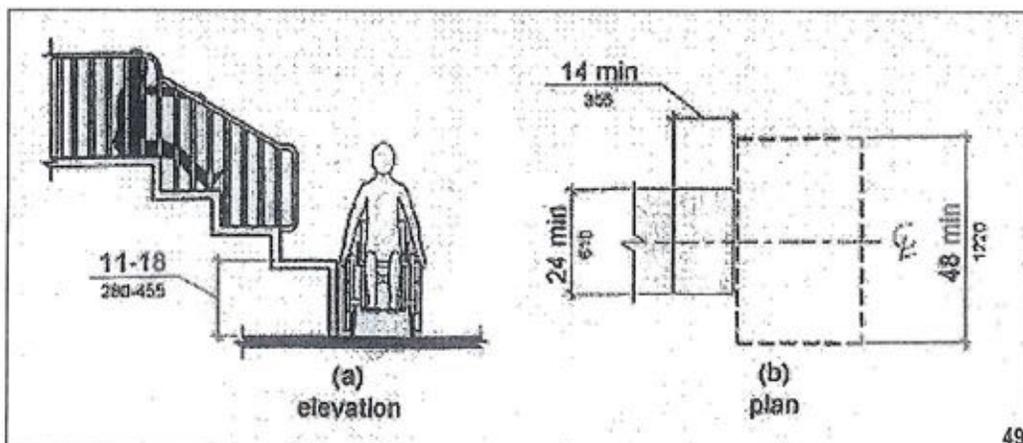


- 11 inches (280 mm) to 18 inches (455 mm) height of top surface
- Minimum 24 inches (610 mm) wide
- Minimum 14 inches (355 mm) deep
- Unobstructed side

Adding a transfer step that leads to the ground's surface increases access for children exiting components at the ground level.

Clear floor or ground space - used for parking wheelchair or mobility devices (commonly called "wheelchair parking") - is required at the transfer platform.

The 48-inch long side (1200 mm) of the "wheelchair parking" space must be parallel to the 24-inch (610 mm) side of the transfer platform.



*Transfer steps in a play area are not required to satisfy the general ADAAG stair requirements.*

*Maneuvering space and clear space is not required on elevated structures or at elevated play components reached by a transfer system.*

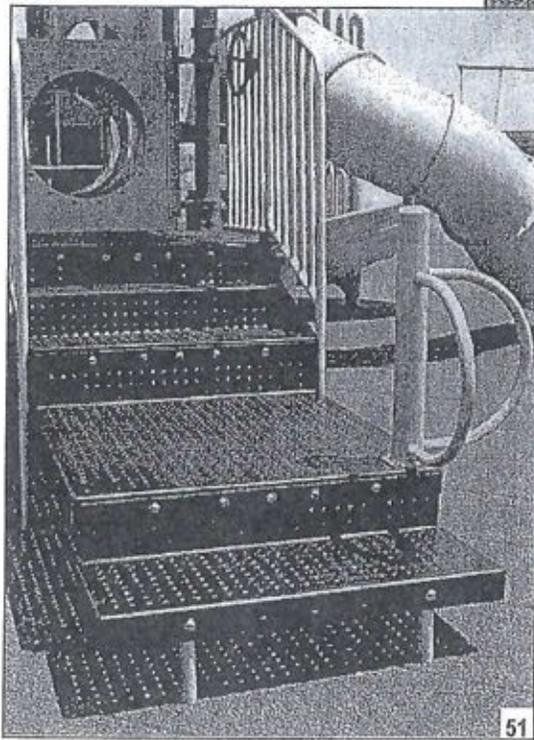
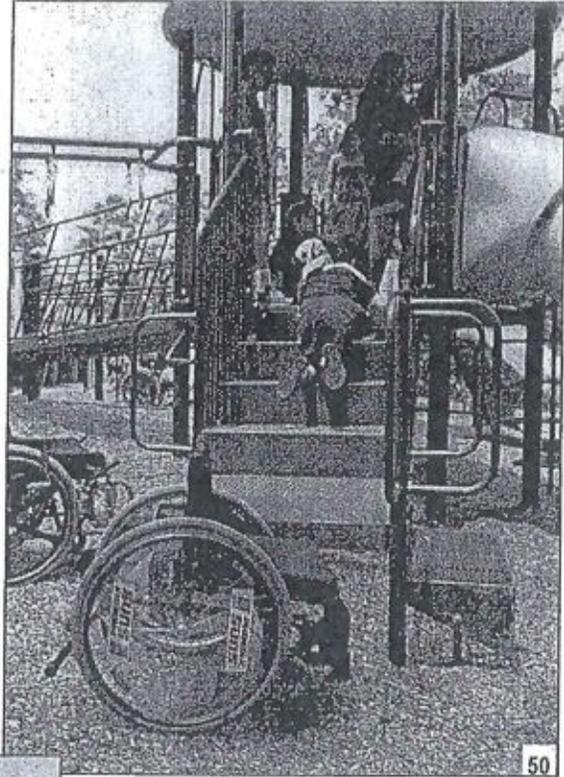


U.S. Access Board  
A Summary of Accessibility  
Guidelines for Play Areas

**Transfer Steps**

*Transfer steps are level surfaces in a composite structure that can be used for transferring from different levels to access play components.*

- Minimum 24 inches (610 mm) wide
- Minimum 14 inches (355 mm) deep
- 8 inches (205 mm) maximum height



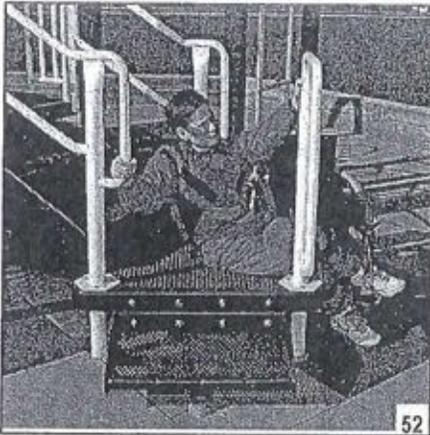
Play areas intended for smaller children should provide steps at smaller height increments. This will accommodate smaller sized children who must lift or "bump" up each step.



## WHAT ARE THE REQUIREMENTS FOR ACCESSIBLE ROUTES?

### Transfer Supports

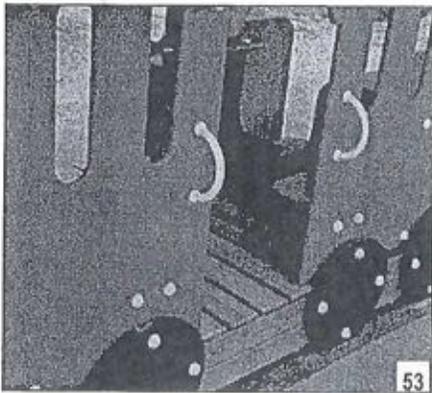
Transfer supports must be provided on transfer platforms and transfer steps at each level where transferring is the intended method of access.



Materials in a variety of different shapes and sizes are used to manufacture transfer supports including metal, plastic, and rope.

*A means of support is required when transferring into the entry or seat of a play component.*

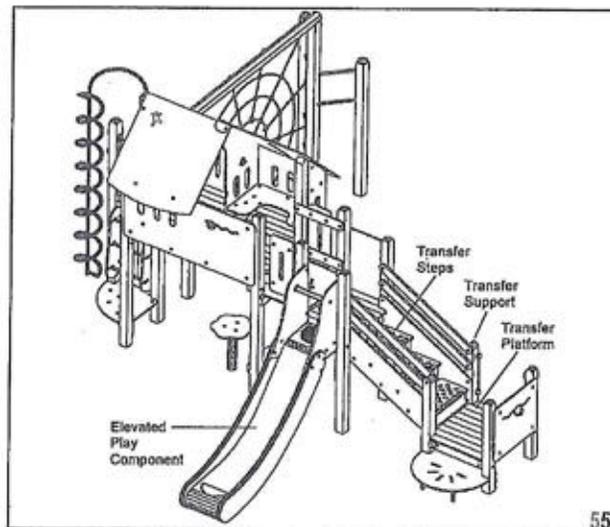
*Transfer supports assist individuals with transferring and general mobility. They include handrails, handgrips, or custom designed handholds.*



Aesthetically pleasing cut-out shapes and other design enhancements can provide hand supports for transferring.

Consideration must be given to the distance between the transfer system and the elevated play components it is intended to facilitate. Designers should minimize the distance between the point where a child transfers from a wheelchair or mobility device and the elevated play destination.

This transfer system provides access to exciting elevated play experiences like sliding while minimizing the distance individuals must traverse.



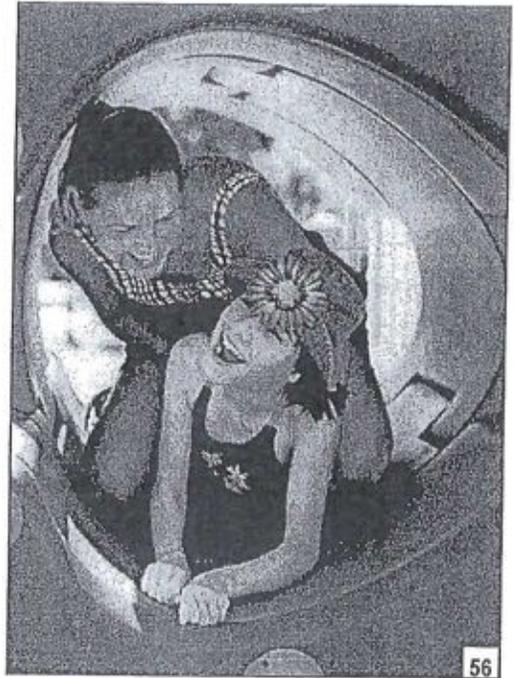
U.S. Access Board  
A Summary of Accessibility  
Guidelines for Play Areas

### Connected Elevated Components

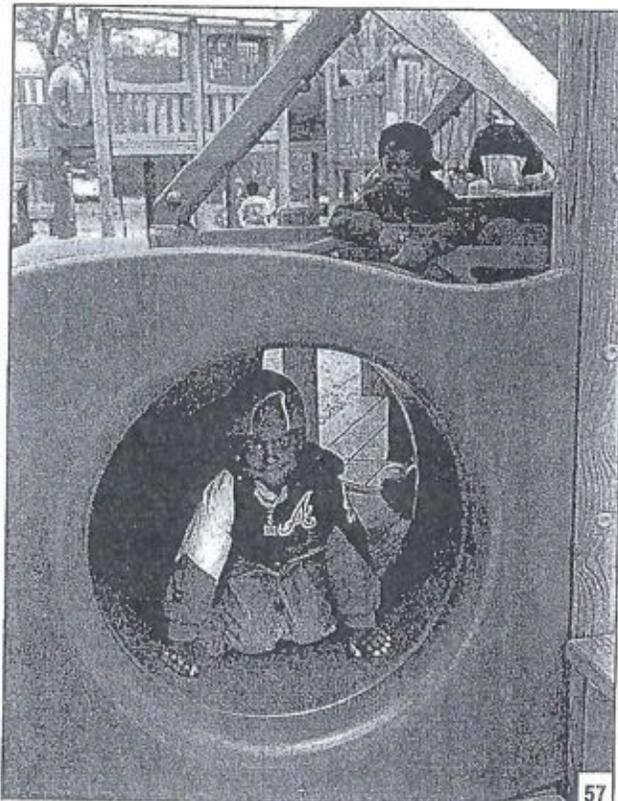
When transfer systems are used, an elevated play component may connect to other elevated play components, providing an innovative, accessible route.

*Elevated play components that are connected to other play components count toward fulfilling the requirement for the number of elevated components on an accessible route where transfer systems are used.*

A crawl tube is an elevated play component in this composite structure. Going through the tunnel provides access to additional activities on the other side.



Consideration should be given to how a play component is utilized when it is selected to connect to other elevated play events. When a transfer system is provided, children move through a play component like this crawling tube, using their own strength without a mobility device.



Providing variety and excitement through elevated play spaces benefits all children. Tunnels and tubes make "getting there" an activity in itself.



## WHAT OTHER ACCESSIBILITY REQUIREMENTS APPLY TO PLAY COMPONENTS?

The play area guidelines address accessible routes connecting play components along with certain spaces that are crucial to making a play area usable for children with disabilities. The other requirements for play components are provided to promote general usability, with application to a variety of play components. Additional features will assist in making play components more accessible to more children. Designers are encouraged to consider components with back support, increased space for maneuvering adjacent to the play component, and other features that promote independent use.

### Clear Floor or Ground Space

Clear floor space - also known as ground space - provides unobstructed room to accommodate a single stationary wheelchair and its occupant at a play component on an accessible route.

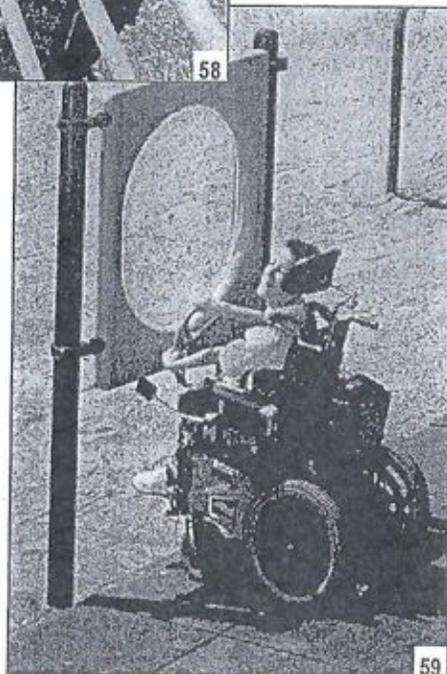
- 30-inch (760 mm) by 48-inch (1220 mm) minimum area
- May overlap accessible routes and maneuvering spaces
- Slope not steeper than 1:48 in all directions



The clear floor space is permitted to overlap onto the landing area to provide access to this elevated window activity.

Play components come in a variety of shapes and sizes facilitating a broad range of experiences. A specific location for clear floor or ground space has not been designated. Each play component is unique and the spaces must be placed in the best location for the situation.

This interactive play component has a clear ground space that allows front or side reach interaction.



*Elevated play components accessed by transfer systems do not require maneuvering or clear floor spaces, since mobility devices are left at ground level.*

*Clear floor or ground space is also sometimes called "wheelchair parking space."*

*The minimum clear floor or ground space on a composite structure may be positioned for a forward or parallel approach. It may overlap accessible routes and maneuvering spaces.*

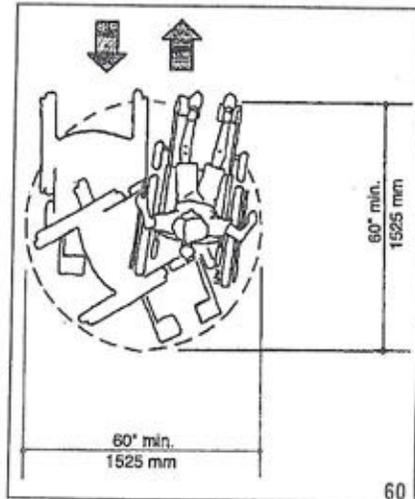


U.S. Access Board  
A Summary of Accessibility  
Guidelines for Play Areas

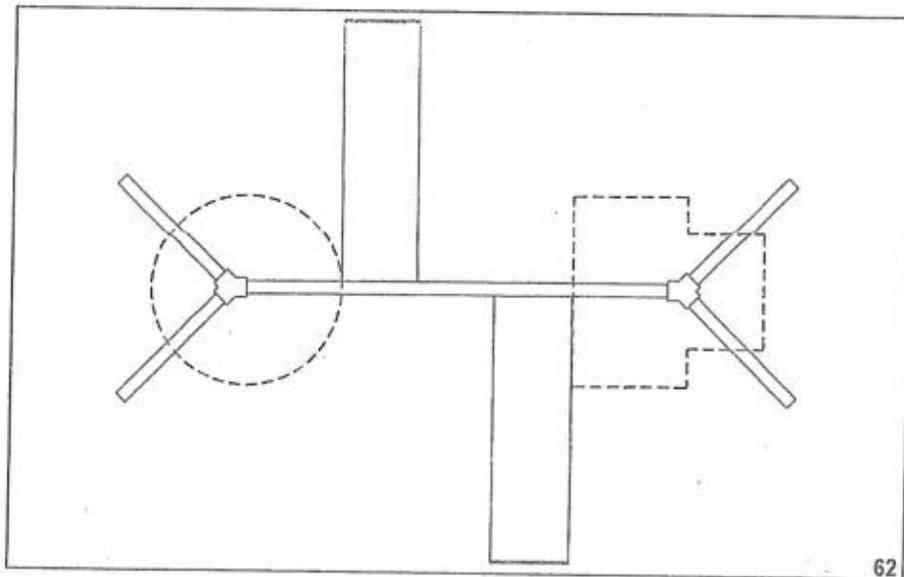
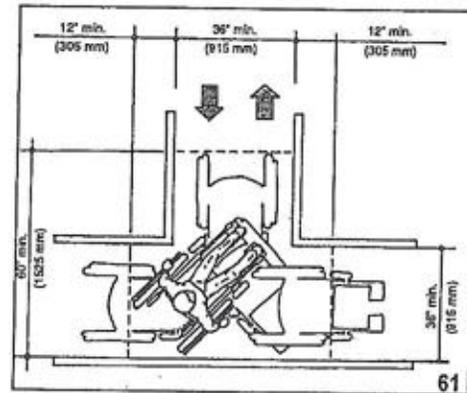
## Maneuvering Space

Maneuvering space is defined as the space required for a wheelchair to make a 180-degree turn. At least one maneuvering space must be provided on the same level as elevated play components.

When providing access to ground level and elevated play components by ramps, space allowances to accommodate wheelchairs and mobility devices are required.



- A 60-inch (1525 mm) turning circle permits individuals with mobility devices to turn around
- A 60-inch (1525 mm) T-Shaped turn allows an individual to change directions by making a series of multi-point turns
- Slope not steeper than 1:48 in all directions



Maneuvering space is required for swings and must be located adjacent to the swing. This illustration shows options for either a 60-inch turning circle or a T-shaped turn. While this illustration shows the maneuvering space to the side of the swing, the space may be located behind or in front of the swing as long as it is immediately adjacent to the swing.

Objects are not permitted to protrude into ground level maneuvering spaces at or below 80 inches (2030 mm) above the ground or floor surface.

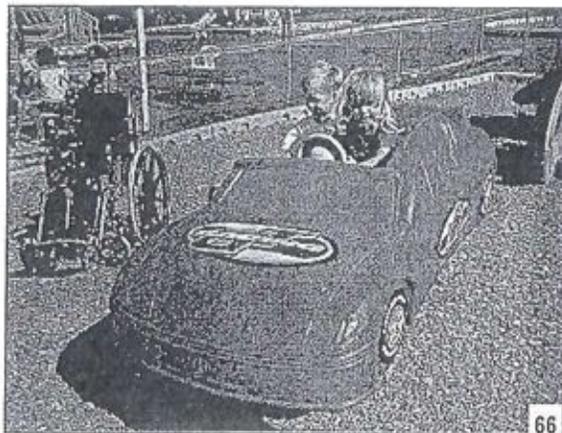
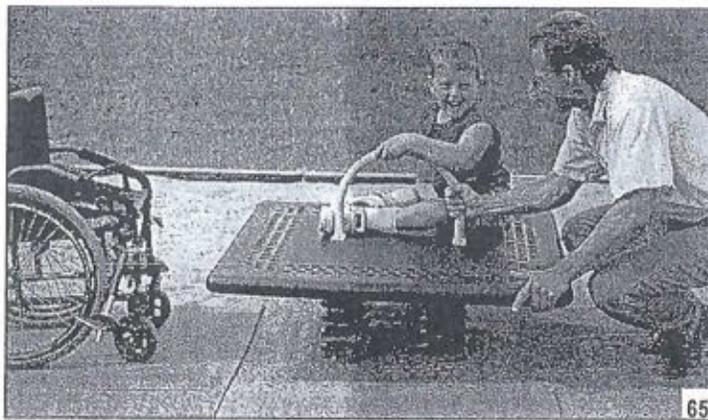
## **Entry Points and Seats**

Entry points and seats are features of play components where individuals would transfer, sit, or gain access. When play components are located on an accessible route, the height required to transfer directly to the entry point or seat of a play component has a minimum of 11 inches (280 mm) and a maximum of 24 inches (610 mm). A mid-level height of 18 inches (455 mm) is recommended.

*The height of the entry point of a slide is not specified.*



Examples of entry points and seats include swing seats, spring rocker seats, and crawl-tube openings.



Consider design features like open sides, back supports, and hand supports to help facilitate easy transfer and access.



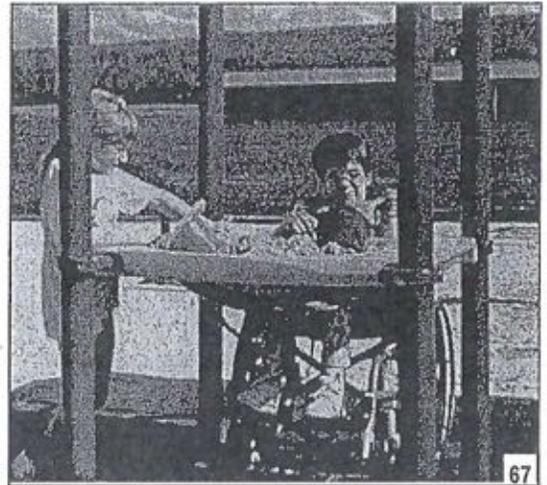
U.S. Access Board  
A Summary of Accessibility  
Guidelines for Play Areas

## Play Tables

*Play tables may be located at a ground or elevated level in a composite play structure. Consider the route, clear floor space and maneuvering spaces for tables intended to be accessible to individuals who use wheelchairs.*

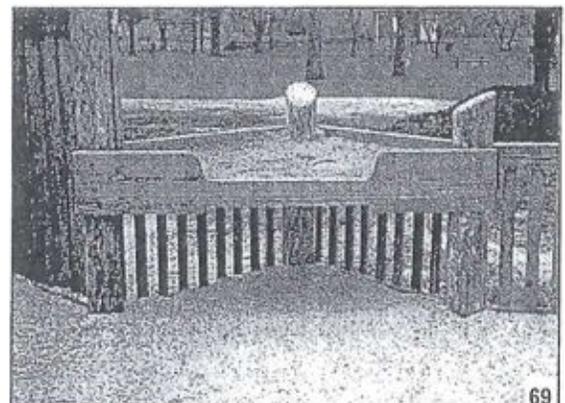
Play tables are surfaces, boards, slabs, or counters that are created for play. This includes tables designed for sand and water play, gathering areas, and other activities. Where play tables are located on an accessible route, the wheelchair knee clearance minimums are:

- 24 inches (610 mm) high minimum
- 30 inches (760 mm) wide minimum
- 17 inches (430 mm) deep minimum



Play tables designed primarily for children under 5-years-old, may provide a parallel approach instead of knee clearance if the rim is a maximum of 31 inches (785 mm) high.

The edge of this elevated sand table has been designed to provide access by providing a generous opening. The tops of rims, curbs, or other obstructions that would prevent access to a table surface should be 31 inches (785 mm) maximum in height.



U.S. Access Board  
A Summary of Accessibility  
Guidelines for Play Areas

## WHAT OTHER ACCESSIBILITY REQUIREMENTS APPLY TO PLAY COMPONENTS?

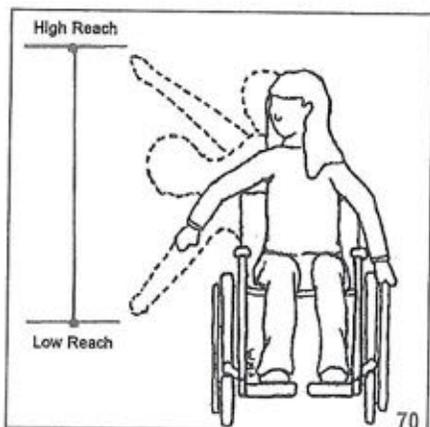
### Reach Ranges (Advisory)

The play area guidelines include advisory information on recommended reach ranges.

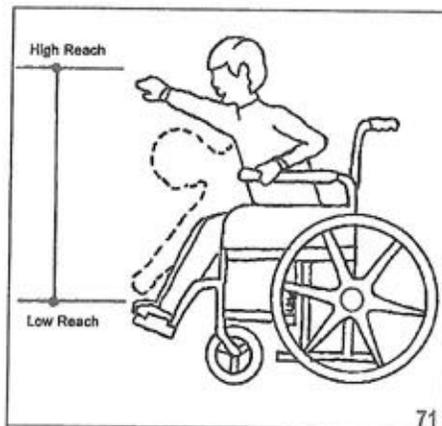
Reach ranges are the recommended designated regions of space that a person seated in a wheelchair can reasonably extend their arm or hand to touch, manipulate, move, or interact with an object or play component.

Reach ranges should be considered when providing play components with manipulative or interactive features for children who use wheelchairs. Recommended forward or side reach ranges are:

- 20 to 36 inches for 3 to 4 year-olds
- 18 to 40 inches for 5 to 8 year-olds
- 16 to 44 inches for 9 to 12 year-olds

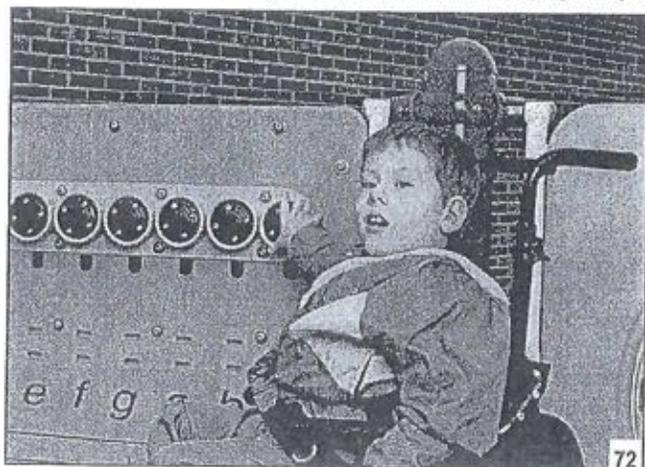


Side Reach



Forward Reach

The reach ranges appropriate for use by children who use wheelchairs to access play components are intended for ground-level components, and elevated components accessed by ramps. Reach ranges are not appropriate for play components reached by transfer systems.



Appropriate reach range heights will vary depending on how the play component is accessed. This interactive panel is mounted at a height appropriate for a child who uses a wheelchair.

*The reach ranges in this guide are recommendations that should be considered when designing play components with manipulative features intended for use by individuals who use wheelchairs.*



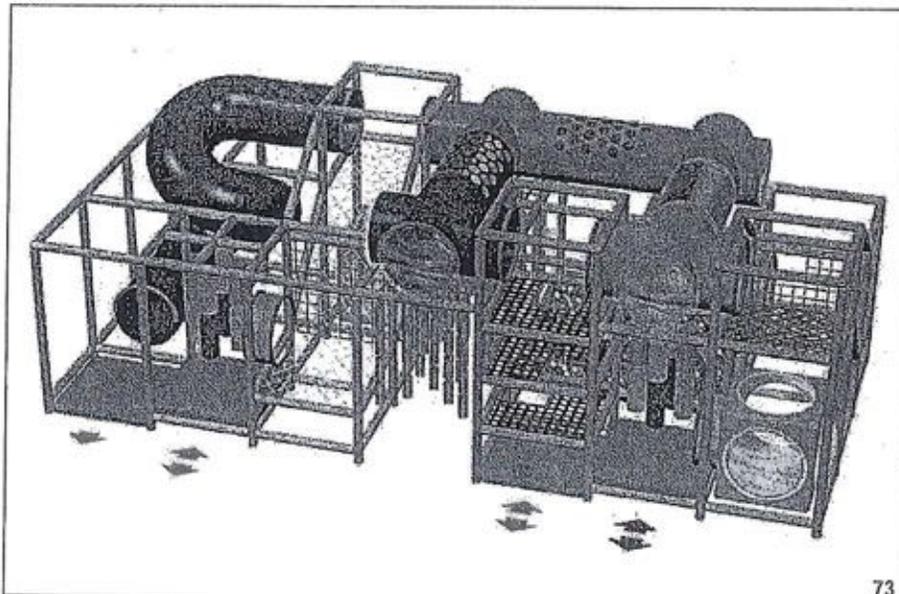
U.S. Access Board  
A Summary of Accessibility  
Guidelines for Play Areas

## SOFT CONTAINED PLAY STRUCTURES

*"Soft contained play equipment" is a play structure made of one or more components, on which an individual enters a fully enclosed play environment that uses pliable materials such as plastic, soft padding, and fabric.*

Soft contained play structures must provide at least one entry point on an accessible route when three or fewer entry points are provided.

If four or more entry points are provided, at least two entry points must be located on an accessible route.



Soft contained play environments typically have limited entrance and exit locations, with play components integrated into the system design.



Transfer systems or platform lifts can serve as a part of an accessible route connecting entry points on soft-contained play structures.

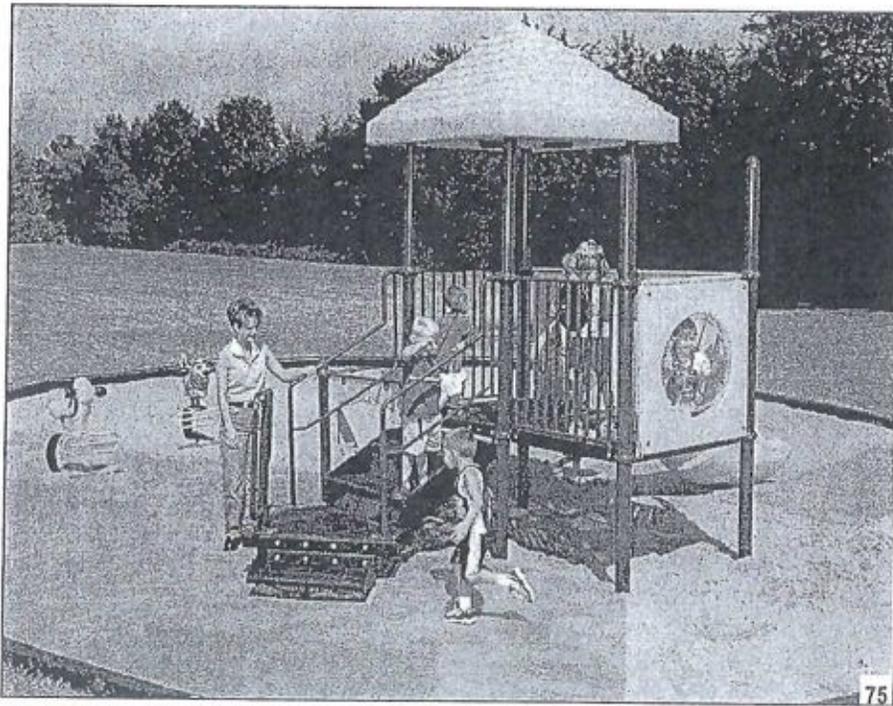


U.S. Access Board  
A Summary of Accessibility  
Guidelines for Play Areas

The play area guidelines apply to alterations made to existing play areas that affect, or could affect, the usability of the play area. Examples include removing a climbing play component and replacing it with a spring rocker, or changing the ground surfacing.

Alterations provide an opportunity to improve access to existing play areas. Where play components are altered and the ground surface is not, the ground surface does not have to comply with the ASTM F 1951-99 standard for accessible surfaces unless the cost of providing an accessible surface is less than 20 percent of the cost of the alterations to the play components.

If the entire ground surface of an existing play area is replaced, the new ground surface must provide an accessible route to connect the required number and types of play components. The requirements for accessible routes are explained on page 19.



This play area was altered by adding two spring rockers. The seat of at least one spring rocker is between 11 inches (280mm) and 24 inches (610mm) maximum, and clear floor or ground space and maneuvering space is provided. If the ground surface is replaced in the future, an accessible route would have to be provided to the spring rocker.

*Normal maintenance activities such as replacing worn ropes or topping off ground surfaces are not considered alterations.*

*If play components are relocated in an existing play area to create safe use zones, the guidelines do not apply, provided that the ground surface is not changed or extended for more than one use zone.*

*Replacing the entire ground surface does not require the addition of more play components.*



U.S. Access Board  
A Summary of Accessibility  
Guidelines for Play Areas

## ACKNOWLEDGEMENTS

The Access Board would like to thank the following manufacturers for their generous assistance and for supplying appropriate photographs or illustrations: Bob Leathers, Columbia Cascade, GameTime, KOMPAN, Landscape Structures, Little Tikes, Miracle, Olympic Recreation, Playworld Systems, and Recreation Creations.

The numerical listing below shows the source of each photo or illustration.

- |                              |                          |
|------------------------------|--------------------------|
| Top Cover Photo - KOMPAN     | 38. KOMPAN               |
| Bottom Cover Photo - Miracle | 39. KOMPAN               |
| 1. KOMPAN                    | 40. GameTime             |
| 2. Little Tikes              | 41. GameTime             |
| 3. KOMPAN                    | 42. GameTime             |
| 4. KOMPAN                    | 43. Playworld Systems    |
| 5. KOMPAN                    | 44. Landscape Structures |
| 6. Little Tikes              | 45. Miracle              |
| 7. KOMPAN                    | 46. Landscape Structures |
| 8. Little Tikes              | 47. Little Tikes         |
| 9. KOMPAN                    | 48. Landscape Structures |
| 10. KOMPAN                   | 49. KOMPAN               |
| 11. Landscape Structures     | 50. Game Time            |
| 12. Miracle                  | 51. Recreation Creations |
| 13. KOMPAN                   | 52. Miracle              |
| 14. Little Tikes             | 53. KOMPAN               |
| 15. GameTime                 | 54. Playworld Systems    |
| 16. Playworld Systems        | 55. KOMPAN               |
| 17. GameTime                 | 56. KOMPAN               |
| 18. Little Tikes             | 57. KOMPAN               |
| 19. Landscape Structures     | 58. Olympic Recreation   |
| 20. Miracle                  | 59. Playworld Systems    |
| 21. Recreation Creations     | 60. KOMPAN               |
| 22. Miracle                  | 61. KOMPAN               |
| 23. Miracle                  | 62. Access Board         |
| 24. Landscape Structures     | 63. Playworld Systems    |
| 25. Miracle                  | 64. Little Tikes         |
| 26. Columbia Cascade         | 65. Landscape Structures |
| 27. Playworld Systems        | 66. GameTime             |
| 28. GameTime                 | 67. Playworld Systems    |
| 29. KOMPAN                   | 68. Landscape Structures |
| 30. Elizabeth Garufi         | 69. Bob Leathers         |
| 31. Little Tikes             | 70. KOMPAN               |
| 32. Playworld Systems        | 71. KOMPAN               |
| 33. KOMPAN                   | 72. Miracle              |
| 34. Columbia Cascade         | 73. GameTime             |
| 35. KOMPAN                   | 74. Access Board         |
| 36. KOMPAN                   | 75. Miracle              |
| 37. Little Tikes             |                          |



U.S. Access Board  
Summary of Accessibility  
Guidelines for Play Areas