



Town of Belmont, Massachusetts

PART A – Executive Summary

September 2021

Prepared by the



200 Portland Street, First Floor
Boston, MA 02114
617.695.1225 voice/tty
www.IHCDesign.org

Introduction

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

The set includes seven (7) public buildings – including two (2) municipal buildings, two (2) fire stations, one (1) library, one (1) senior center and one (1) swimming pool and bathhouse. In addition, four (4) parks were surveyed. The accessibility survey of those facilities includes all the spaces where the Town offers programs, services and activities to members of the public.

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

In addition, a spreadsheet of priorities for corrective action organized by type of building, facility or park and including order-of-magnitude costs was provided to the Town. When the Town presents findings and recommendations to the community and receives feedback, some recommendations may need cost adjustment.

These spreadsheets are a capital planning and budgeting tool – the “*ADA Transition Plan*” is intended as a long-term tool to update as work is completed. The Town should make a good faith effort to complete the work in a reasonable time (IHCD assumes a five to eight-year period). Together, the ADA Self-Evaluation and ADA Transition Plan will enable the Town to make substantial progress in meeting its ADA responsibilities. The recommendations for corrective action on policies and procedures of the ADA Self-Evaluation are not included in the ADA Transition Plan since that is limited to capital accessibility issues. But they are a blueprint for meeting compliance responsibilities other than capital expenses and action is expected quickly.

IHCD also submitted a complete assessment of the Town's policies, practices and procedures.

(See the complete summary in *Part B – Evaluation of Non-Discriminatory Policies and Practices in Programs, Services and Activities* report.)

The review of the ADA administrative requirements help ensure that the needs of people with disabilities are addressed in all services, programs and activities that the Town operates.

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

- The Town of Belmont has hired a consultant (IHCD) to undertake its ADA self-evaluation (as basis for the Town's Transition Plan).
- The Town of Belmont has an ADA Coordinator in place.
- From the responses to the ADA questionnaire, there is no evidence that the Town has failed to provide reasonable accommodation to its employees.

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

Many key facilities are generally usable by people with disabilities but are not in full compliance with current accessibility requirements. The Main Library, for instance, provides access to many programs and can be accessed by most people because the building features largely accessible toilet rooms, and has accessible routes through most of the building. Yet some of the key areas such as the auditorium have accessibility issues. In addition, drinking fountains are not provided for standing users in two (2) locations. The Town Hall is another example of a facility that provides access to most programs. In the auditorium, all accessible seating spaces, aisle-designated seats and companion seats can be located on the first floor; yet the auditorium lacks an assistive listening system. Additionally, if the public is allowed to

access the basement/dressing room level near the auditorium, IHCD recommends providing a Limited Use Limited Application (LULA) elevator to this location.

The Town may comply with the requirements of Title II of the ADA through means such as reassignment of programs or services to accessible buildings or delivery of services at alternate accessible sites. The Town may also comply with the requirements by renovation or alteration of existing facilities and/or construction of new facilities, or any other methods that result in making the Town's services, programs or activities readily accessible to and usable by individuals with disabilities. Note that a public entity is not required to make structural changes in existing facilities where other methods are effective in achieving compliance with this section.

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

In order to comply with the Town's program accessibility obligations, the Town of Belmont should consider:

1. Relocation of its programs, services and activities within current facility

Often the simplest solution is for the Town to use what it already has in place. IHCD strongly recommends the relocation of programs, services and activities to accessible locations within the facility.

2. Relocation of its programs, services and activities to another facility

When it is not possible to relocate them within the current facility, programs, services, and activities should be relocated to an accessible facility.

3. Renovation/alteration of its facilities to ensure access to programs, services and activities

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

Note that any corrective actions needed to ensure program accessibility must comply with the requirements of the 2010 ADA Standards for Accessible Design and/or 521 CMR.

Furthermore, when doing alteration/renovation work, keep in mind that an alteration that decreases the accessibility of a building below the requirements for new construction at the time of the alteration is prohibited.

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

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

Key Recommendations for Building Facilities:

- Ensure there is an accessible route from all arrival points to those areas in the building where the programs, services and activities are provided. For example, there is no accessible route provided to the stage in the assembly area of the Main Library or the dressing room level of Town Hall.
- If parking is provided, ensure fully accessible parking spaces are provided.
- If a toilet is provided in a facility, ensure that fully accessible toilet rooms are provided. Where it is technically infeasible to provide accessible multi-user toilet rooms, provide an accessible single-user toilet room in the same area as the existing multi-user toilet rooms or inaccessible single-user toilet rooms.
- Where shower rooms are provided, ensure that accessible shower compartments are provided. For example, at the Underwood Pool and Bathhouse, IHCD recommends renovating the shower in the men's and women's multi-user shower/toilet rooms, as well as one of the showers in the single-user toilet/shower rooms by the main entrance.
- Ensure that where the programs, services or activities are offered there is a sufficient number of accessible features (accessible counters, accessible work surfaces, etc.). Particular attention should be given to the Homer Municipal Building and Town Hall, where key programs are being offered to the community.
- If audible communication is integral to the use of a space, provide a compliant assistive listening system. This should be a priority at the assembly area in the Main Library, the

training room in Fire Headquarters and the multipurpose room in the Beech Street Center.

- Ensure that compliant egress and designation signage is provided (Town Hall, Homer Municipal Building, Fire Station Headquarters, Main Library, Underwood Pool and Bathhouse and Beech Street Center).
- Ensure that those features of facilities and equipment that are required to be readily accessible to and usable by persons with disabilities are maintained in operable working condition (e.g., elevators or automatic door openers, assistive listening systems).
- Provide accessible drinking fountains for wheelchair users and standing users.

Key Recommendations for Outdoor Facilities:

- Ensure there is an accessible route to all elements in the park/outdoor space (baseball fields, basketball courts, playgrounds, picnic areas, toilet facilities, etc.).
- Ensure there is a clear floor space adjacent to the bench at team seating areas and spectator seating areas such as bleachers at the baseball fields, basket courts, etc:



Diagram above shows an accessible space alongside team seating.

- Ensure that accessible routes are provided to and around playgrounds; in addition, ensure that an accessible route is provided in the play area to all play components.

All of the surveyed playgrounds in Belmont have engineered wood fiber (EWF) as a play surface. The ADA allows engineered wood fiber as an accessible surface when it is installed properly and maintained to be stable, firm and slip-resistant. Engineered wood fiber surfaces will require frequent maintenance to comply because of surface

displacement due to weather, user activity and other factors.

The Massachusetts Architectural Access Board (MAAB) has long considered engineered wood fiber and wood chips as noncompliant and problematic materials. While it reserves the right to reevaluate this in the future, it is currently MAAB's opinion that such material is not clearly compliant with the requirements of 521 CMR.

- Ensure that a certain number of amenities (at least 5%) in the parks/outdoor spaces are accessible (e.g., picnic tables).