



Town of Barnstable, Massachusetts

PART A – Executive Summary

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Prepared by the



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Introduction

The Institute for Human Centered Design (IHCD) has prepared this report on behalf of the Town of Barnstable as part of the Town's on-going effort to assess the current level of Americans with Disabilities Act (ADA) compliance in programs, services and activities and Town-owned facilities. The Request for Proposal (RFP) included 107 facilities; In preparing for this report, IHCD teams surveyed the Town's portfolio of facilities and properties. In some instances, facilities that were in close proximity of each other were combined in to one report.

Locations surveyed included 38 primary assets, and 12 secondary assets. The accessibility survey of those facilities includes all the spaces where the Town offers programs, services and activities to members of the public. The outdoor facility set included 33 beaches, parks and playground locations. The accessibility survey of those spaces encompassed elements such as accessible routes, walking surfaces, slopes, picnic tables, play areas and recreational areas. In addition, eight (8) municipal parking locations were also surveyed; the accessibility survey of those facilities includes elements such as accessible routes, accessible parking spaces and pedestrian entry points.

Locations listed in the RFP but not offering public programming were not surveyed. That includes 15 facilities; a combination of primary assets and secondary assets. One (1) additional location, Zion Church Museum, was also not surveyed.

Note: IHCD scope of work did not include the full review of the exhibitions, at the JFK Museums, the U.S. Custom House Carriage Shed, the Old Jail, and the West Barnstable Train Station. There are accessibility issues at those locations that have been documented. The content of the entire exhibition has to be made accessible for people who are blind or have low vision by ways of auxiliary aids or services. A full review of exhibits is desirable. As a reference for accessible exhibitions, please check the Smithsonian Guidelines for Accessible Exhibition Design: www.sifacilities.si.edu/sites/default/files/Files/Accessibility/accessible-exhibition-design1.pdf

In addition, a GIS survey of the streets was also performed. The survey included the seven (7) villages in the Town of Barnstable. To ensure that the Town is in compliance with Title II of the Americans with Disabilities Act IHCD uses the U.S. Access Board's Proposed Public Rights-of-Way Accessibility Guidelines (PROWAG). The Rules and Regulations of the Massachusetts Architectural Access Board - 521 CMR are also part of the survey. The deliverable includes a

dashboard and a GIS map layer with the street and sidewalk accessibility issues for each of the villages.

IHCD has submitted separate reports for each facility that was surveyed. To assist in prioritizing accessibility improvements to ensure compliance with Title II of the ADA, 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 catalog that supplements the ADA Self-Evaluation narrative is also included. The catalog provides element-by-element photos of compliance issues, location and measurements – when applicable – at each assessed facility accompanied by recommendations and cost estimates for addressing each accessibility issue.

In addition, a spreadsheet of priorities for corrective action organized by type of building or location 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” – and are intended as a long-term resource to update as work is completed. The Town should make a good faith effort to complete the work in a reasonable time (IHCD recommends a three (3) to five (5) year period). The ADA regulations do not set out precise timeframes to complete the work; IHCD bases the timeframes on conversations with the Department of Justice (DOJ) and their Project Civic Access settlement agreements with municipalities.

Together, the ADA Self-Evaluation and ADA Transition Plan will enable the Town to make substantial progress in meeting its ADA responsibilities. The recommendations for corrective action that apply to policies and procedures of the ADA Self-Evaluation are not included in the ADA Transition Plan since the Transition Plan spreadsheet is limited to capital accessibility issues. Policy and procedure recommendations, covered in detail in the provided *Part B – Evaluation of Non-discriminatory Policies & Practices in Programs, Services & Activities report*, are a blueprint for meeting compliance responsibilities other than capital expenses. The ADA administrative requirements help ensure that the needs of people with disabilities are addressed in all services, programs and activities that the Town offers.

A Website Accessibility and Usability Assessment report was also be submitted. The report will provide information about the Town’s website accessibility issues and will also include recommendations for corrective measures.

Most of the Town-owned facilities that have been recently altered or renovated are substantially accessible and meet most architectural requirements. Continued facility alterations, and/or renovations will significantly reduce barriers and help 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 Barnstable has hired a consultant (IHCD) to undertake its ADA self-evaluation (as the basis for the Town's Transition Plan).
- The Town of Barnstable has appointed William Cole, Human Resources Director, as the Town's ADA Coordinator.
- The Town has adopted a Public Notice Policy (posted on the Town's website within the Human Resources webpage).
- The Town has developed a Grievance Procedure (posted on the Town's website within the Human Resources webpage).

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

Many key facilities are generally usable by people with disabilities but are not in full compliance with current accessibility requirements. The Town Hall, for instance, provides access to many programs and can be accessed by most people. However, the major accessibility issue is the lack of a compliant elevator that provides access to all floors, a key component to access some of the services provided by the Town. As a result, programs such as the Hearing Room located on the 2nd floor is not accessible to members of the public that may need the elevator to access the program. Other major accessibility issue is the fact that the only accessible entrance is often locked during times when the Town Hall is open for business. It is worth noticing that elements of accessible features are required to be in operable working condition. Additional accessibility issues identify includes lack of an accessible men's toilet room (3rd floor) and lack

of accessible service counters. IHCD considers that a study is needed to determine the feasibility of providing a compliant elevator that connects all floors at the Town Hall.

The Adult Community Center in Hyannis is another example of a facility that provides access to most programs, however additional steps are needed to ensure that program accessibility is achieved.

At the Hyannis Youth and Community Center neither of the two (2) available ice rinks were accessible. In order to provide program access, IHCD team determined that the larger Kennedy ice rink should have its accessibility issues addressed.

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 its Title II obligations.

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

In order to comply with the program accessibility obligations, the Town of Barnstable should consider:

1. Relocation of its programs, services and activities within a 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 current facilities when possible.

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

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

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

activities.

The Town may consider the renovation of its facilities or the provision of new accessible 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 and/or 521 CMR.

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

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.

Regarding alterations to qualified historic buildings and facilities, there are exceptions for alterations the ADA Standards. Those exceptions include accessible routes, entrances and toilet facilities. If alterations to a qualified historic building or facility to achieve program accessibility would threaten or destroy the historic significance of the building or facility, fundamentally alter the program, or result in undue financial or administrative burdens, the ADA regulations allow alternative methods to be used to achieve program accessibility. Alternative methods include using audio-visual materials to depict portions of the facility that cannot otherwise be made accessible.

Key Recommendations for Primary Assets:

- Ensure there is an accessible route from all arrival points to those areas in the building where public programs, services and activities are provided. For example, thirteen locations listed as primary assets have issues with accessible parking. If parking is provided, ensure fully accessible parking spaces are provided. In addition, six (6) primary asset locations including the Barnstable Adult Community Center, the Cape Cod Maritime Museum, the Comfort Station at 230 South Street, the Department of Public Works, Marine and Environmental Affairs and the West Barnstable Community Building require at least

one automatic door.

- Ensure that fully accessible toilet rooms are provided in the building. 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.
- Ensure that where programs, services or activities are offered there is a sufficient number of accessible features (accessible service counters, accessible work surfaces, etc.).
- If audible communication is integral to the use of the space, provide a compliant assistive listening system. Six (6) locations listed as primary assets lacked assistive listening systems. These locations include the Barnstable Adult Community Center, the Centerville Recreation Building, the Hyannis Golf Course, the Hyannis Youth and Community Center, and the Hyannis John F. Kennedy Museum.
- 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). For example, the accessible entrance at the Town Hall, and nine (9) locations listed as primary assets have accessibility issues with ramps such as noncompliant or missing handrails and lack of edge protection.

Key Recommendations for Secondary Assets:

- Ensure there is an accessible route from all arrival points to those areas where public programs, services and activities are provided. For example, six (6) locations listed as secondary assets have accessibility issues such as excessive changes in level or excessive running or cross slopes with existing accessible routes or lack accessible routes. These include the Band Shell, Creative Arts II, Meetinghouse Barn, Sea Street Bathhouse and Keyes Memorial Beach, and the Wequaquet Lake Beach and Bathhouse. (In the case of Sea Street Bathhouse and Keyes Memorial Beach and Wequaquet Lake Beach and Bathhouse, issues include lack of a beach access route and a beach mat is required.)
- Ensure fully accessible toilet rooms or compliant accessible portable toilets are provided. Creative Arts 2, Joshua’s Pond and Bathhouse, Office, Greenhouse and Garage, Sandy Neck Gatehouse, Sea Street Bathhouse and Keyes Memorial Beach and Wequaquet Lake Beach and Bathhouse all have accessibility issues with toilet rooms. In addition, Sea Street Bathhouse and Keyes Memorial Beach and Wequaquet Lake Beach and Bathhouse all lack compliant accessible portable toilets that comply with 521 CMR, the regulations of the

Massachusetts Architectural Access Board (MAAB).

- Ensure that where programs, services or activities are offered there is a sufficient number of accessible features (accessible service counters, accessible work surfaces, etc.). For example, Sea Street Bathhouse and Keyes Memorial Beach lacks an accessible service counter on the east side, and there is lack of a cane-detectible barrier at a service counter located at the West Barnstable Train Station. Also, Sea Street Bathhouse and Keyes Memorial Beach and Wequaquet Lake Beach and Bathhouse each lack an accessible picnic table.

Key Recommendations for Beaches, Parks and Playgrounds:

- At beaches, ensure the accessible route extends to the high tide level (if there is a tidal beach), or to the recreation water level (if there is a lake or pond).
- Among locations listed in the Beaches, Parks and Playgrounds category, beach mats must be provided at Covell's Beach and Bathhouse, Craigville Beach and Bathhouse, Dowses Beach, Hamblin Pond and Bathhouse, Kalmus Beach and Bathhouse, Sandy Neck Beach and Bathhouse and Veterans Beach, Playground and Bathhouse.
- The extreme topography prevents the provision of an accessible route to two (2) viewing areas at Hathaway's Pond. Similarly, Millway Beach was not deemed accessible. The topography of the beach prevents the possibility of providing an accessible route. In order to have program accessibility there should be information on signage at these locations and on appropriate municipal materials and webpages directing visitors to comparable amenities available at accessible locations in Barnstable.
- Where outdoor rinsing showers are provided ensure compliant accessible outdoor rinsing showers are also provided. Among locations listed in the Beaches, Parks and Playgrounds category, Covell's Beach and Bathhouse, Craigville Beach and Bathhouse, Dowses Beach and Kalmus Beach and Bathhouse all lack compliant outdoor rinsing showers. See the illustration showing a compliant accessible rinsing shower towards the end of this document.
- Where playgrounds are provided, ensure that accessible routes are provided to and around playgrounds; in addition, ensure that an impact-attenuating accessible route is provided in the play area to all play components.

Note: Massachusetts Architectural Access Board (MAAB) does not consider engineered wood fiber (EWF) to comply with its regulation requiring an accessible route to and around playground equipment.

- Where changing rooms are provided, ensure accessible changing rooms are also provided. Among locations listed in the Beaches, Parks and Playgrounds category, there are lack of accessible changing rooms at Craigville Beach and Bathhouse and Kalmus Beach and Bathhouse. See the illustration showing a compliant accessible changing room towards the end of this document.
- Ensure there is an accessible route to all elements in the park/outdoor space (baseball fields, basketball courts, tennis courts, playgrounds, picnic areas, beaches, toilet facilities, etc.). For example, the following image uses red lines to show the approximate location of suggested accessible routes to the boundary of sport activity, player and spectator seating, practice areas, and accessible parking spaces at Bay Lane Ballfield:



Barnstable Harbor Marina and Gateway Marina were judged to be inaccessible because of major accessibility issues such as lack of an accessible gangway and lack of an accessible route to the boat slips. Due to the major accessibility issues at Barnstable Harbor and Gateway Marinas, IHCD recommends that the Prince Cove Marina be made accessible in order to provide program accessibility. At Prince Cove Marina accessibility issues include lack of an accessible single-toilet room.

Key Recommendations for Municipal Parking Lots:

- Ensure that exterior accessible routes are maintained in operable working condition, prevent accumulation of water, and are free of level changes greater than ¼ inch. Similarly, restripe accessible parking spaces to ensure they are maintained in operable working

condition.

- Ensure the cross slope of exterior accessible routes does not exceed 1:50 (2.00%).
- Ensure accessible parking spaces have compliant access aisles.
- Ensure the minimum required number of van accessible and standard accessible parking spaces are provided at all parking lots.
- Locate accessible parking spaces on the shortest accessible route to accessible entrance.
- Provide identification signs with the International Symbol of Accessibility (ISA). Mount signs 60" min. above the ground measured to the bottom of the sign and 96" max. above the ground measured to the top of the sign (North Street Parking Lot – West).
- Add the designation "Van Accessible" to the sign locate at van accessible parking spaces (North Street Parking Lot – West, Ocean Street Parking Lot, Town Hall Parking Lot).
- Locate outlets at electrical vehicles on an accessible route. Ensure they are within reach range.

