

**ADA Compliance Report Completed by the
Massachusetts Office on Disabilities
On the entrance and library facilities
At Sawyer Hall
April 14, 2022**

The evaluation findings follow below and were sent in an email following a 1 ½ hour virtual meeting conducted by Jeffrey Dougan, Assistant Director for Community Services.

Subject: Heath - Free Public Library - Access Limitations - Follow Up

Importance: High

Good morning, Hilma and David. (Brian)

I want to thank you for meeting with us virtually to review and discuss your concerns related to architectural accessibility within the Free Public Library located in Heath at One East Main Street on Thursday, April 14, 2022.

This building was originally constructed in 1895 and is located within an historic district. It appears, over the years, there have been attempts to remove or remedy architectural barriers that were present, such as the installation of the ramp at the main entrance, restroom upgrades, and the installation of an elevator. This building occupies most of the lot on which it sits, and is further complicated by wetlands and the private property abutters close to this property.

The issues we discussed, and our opinions of the barriers identified included:

Parking:

- While there are only 4 parking spaces provided across the street, one of the existing spaces would need to be designed as van-accessible but not reserved only to people with a plate or placard. (No signage required). This is a 2010 ADA Design Standard obligation.
- Someone visiting the Library needs to cross the street to access the ramp. The crown of the road, although not currently under the jurisdiction of the MAAB or ADA Design Standards, this is a significant issue as one must cross the street to access the entry point to the ramp, as mentioned below.



The Ramp:

- The landing, or lack of a level landing at the base of the ramp,
 - Due to the degradation of the street, where the catch basin is located, as well as a significant sloped section that connects the street to the 1st ramp run section, this does not appear to be an easy fix. The street will need to be reworked to somehow provide a 5 foot level landing at the base of the ramp, or the ramp needs to be reconfigured, if even possible, to create some sort of ramped entry that does not involve the street. Other potential remedies could be the installation of an exterior lift that would, somehow, somewhere connect to the building. This is complicated due to the wetlands proximity to the building.
- The “Ashfield Stone” surface is heaving and settling, which in turn is creating changes in level over ½ inch in height,
 - To remedy this, the stone will need to be reset within the ramp, again, which will be an extensive project, especially if the slope of the ramp exceeds 8.3% and needs to be brought into compliance or the ramp configuration needs to be modified.
- The handrails of the ramp do not extend 12 inches beyond the end of the ramp.
 - While this may be a safety concern due to the ramps location to the street, I have significant reservations about a ramp discharging people onto an active street without a landing and handrail extensions.



Egress:

- There are multiple egress points from the library. As there are significant concerns related to the ramp, there does not appear to be a compliant accessible means of egress. Two would be required, and the ramp egress is one of them.
 - While we looked at other areas of the building, and due to the lot lines being so close to the building, wetland interactions, and significant vertical distances to overcome, there were significant concerns about where a 2nd accessible means of egress could even be provided.

Library Stacks:

- The clearances that are required within the library, specifically the book stacks, are not adequately provided. Based on the configuration of the stacks, the actual width of the stacks themselves, and the “dead ends” at certain stack locations, a minimum of 36 inches must be provided between the stacks with a 60 inch turning area or turn must be provided at the ends of the stacks.
 - In order to provide the appropriate turning clearances within the current stack system, the stacks would need to be significantly reconfigured. As we discussed during the meeting, this could result in a 40% - 50% loss of available stack space due to the limited size of the building.



Closing Comments:

During the meeting, I did try to “find” a location that may be better suited for access into this building, but due to the proximity to wetlands, private property, and the roads, the location that the current ramp occupies appears to be one of the only spots to locate that ramp. The solution to fixing the ramp will require extensive road work in order to just provide a compliant landing at the base of the ramp, not to mention the work needed on the ramp to reduce the changes in level.

As this building is currently assessed at \$289,000, 521 CMR (the rules and regulations of the Massachusetts Architectural Access Board (MAAB/521 CMR) would require full compliance of the building and all of its entrances, interior spaces, elevator, ramps, stairs, stacks, etc, when the spending intersects with 30% of the assessed value, which currently is \$86,700. The work to fix the ramp and the street, could easily reach this mark.

The ADA has a different requirement, as the ADA is civil rights law and the design standards provide civil rights compliance in the built environment. This is not triggered by work, it is triggered by programming. The program of the library and any unique programming or meetings in this space, would need to comply with the design standards, unless the programming can be relocated.

It is my opinion, with the level of work that needs to be done to fix the ramp and stacks alone, will:

1. Easily surpass the 30% threshold, and therefore require full compliance with the 2006 revision of the MAAB,
2. Reduce the library stack capacity by 40%-50%, and finally,
3. Until ADA Compliance can be met, the program should be relocated to ensure compliance with the Americans with Disabilities Act Title II Programmatic Access obligations.

If there are any additional questions related to this report, please let us know.

Sincerely,

Jeffrey L. Dougan

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