Americans with Disabilities Act (ADA)
Self-Evaluation/Site Access Survey for the Town of Groton

To: Michelle Collette, ADA Coordinator
Town Hall, 173 Main Street
Groton, MA 01450

Groton Country Club
Address: 94 Lovers Lane
General Manager Shawn Campbell
978-448-3996
Reviewed by the Commission on Accessibility
December 10, 2018

Present today were:

Edward Cataldo, Building Commissioner
Michelle Collette, Town of Groton ADA Coordinator
Consultant James Lyons, Northeast Independent Living Program Inc.
Consultant Grant Murphy, Northeast Independent Living Program Inc.

The Groton Country Club was surveyed by the team above on
June 13, 2018. It is operated and managed by The Town of
Groton. Groton Country Club offers a 9 hole golf course, function
hall, swimming pool, locker rooms, and Public House Pub.

The scope of this report is to identify barriers in programs &
activities that might prevent persons with disabilities from access
to The Groton Country Club and its programs, activities, and
services. The key to our success is to provide equivalent access
to the maximum extent feasible to everyone, regardless of
disability. This report includes an inventory (and details) of the
Club where structural modifications are needed to make facilities accessible to persons with disabilities. Since this is the foundation for the ADA Transition Plan, we recommend The Town maintain it on file/available for public inspection for 5 years from date of completion. This ADA Evaluation includes all: Groton Country Club parking area, Function Hall, Restrooms and Locker Rooms.

Groton Country Club was purchased by the Town of Groton in the 1989. The Function Hall on site is currently the polling location for two Groton precincts.

*In our opinion the following issues were found:*

**Accessible Parking:** The ADA team found that there is a dumpster currently blocking the designated HP accessible parking space near the accessible entrance. We recommend the dumpster be relocated to allow for the accessibility of that parking space. We found that there is not a designated “Van Accessible” parking space at this location. We recommend that a “Van Accessible” sign be purchased and mounted where the current accessible HP parking space is located.

The team also found that the current HP accessible space located near the accessible entrance has an above ground sign that is currently covered by weeds. We recommend that the weeds be removed to allow for accessibility. This is required by Massachusetts AAB, section 2.6, “Accessible features must be kept maintained at all times.” We note that there are essentially two accessible parking areas. One is near the accessible entrance and the other is across the street on the side next to the golf course (see attached photo).

The ADA team found that there is currently no safe delineated crosswalk leading from the accessible parking spaces (adjacent to the golf course) to the accessible entrance. We recommend creating a crosswalk that would be constructed in order to
provide accessibility from those accessible parking spaces on the
golf course side -to the accessible entrance.

**Entrances:** The ADA team found that the slope of the walkway to
the accessible entrance is too steep at this time (photo on page
10). We recommend the installation of handrails on both sides to
achieve fuller ADA compliance and increase safety. We found that
there is ¾ inch crack on this concrete surface of the accessible
entrance to the function hall. We recommend that the crack be
filled in and repaired as recommended by Massachusetts AAB,
section 2.6, “accessible features must be kept maintained at all
times.”

**Curb Cuts:** The ADA team also noted that there is no curb cut on
the sidewalk near the HP accessible parking spaces on the golf
course side of the function hall. We recommend a curb cut be
installed at this location allowing for an accessible path from the
accessible parking to the entrance.

**Doors:** The ADA team found that the door knobs to both offices
in the function hall are not accessible. We recommend the door
hardware be replaced with accessible lever type handles as
recommended by ADA 2010 Standards Section 404.2.7 which
states “The door shall be equipped with hardware that is operable
with one hand and does not require tight grasping, pinching, or
twisting of the wrist.”

**Restrooms:** The ADA team surveyed both the Men’s and
Women’s restrooms and found the signs are posted on the doors.
We suggest they be relocated to the pull side of each door as per
ADA requirement. We also found the coat hooks are mounted too
high to be reached or used by people in a wheelchair. We
recommend that they either be lowered, or new coat hooks
installed to allow for use by people with disabilities.

We also found there are no ADA accessible toilets in either
restroom with the height of each seat ranging from 17 – 19
inches above the ground. We recommend removing one toilet in
each restroom and replacing it with an accessible toilet as per ADA 2010 Standards Priority 3 -Toilet Rooms, as well as Section 603.4.

We found the paper towel dispensers in both the Men’s and Women’s restrooms are too high off the ground measuring at 42 inches. We recommend these be lowered to 38 inches above the floor as per ADA 2010 Standards Section 309.4. We also found that there was not an accessible urinal located in the Men’s room. We recommend that one be installed as required by ADA Section 4.18.2 which states “Urinals shall be wall hung with elongated rim at a maximum 17 inches above the finished floor.” We found the Men’s room stall locks are loose. We recommend they be tightened as required by MA AAB Section 2.6 which states “Accessible features must be kept maintained at all times.”

The ADA Team also found that the mirrors in both the Men’s and Women’s restrooms are too high for people with disabilities. We recommend that they be tilted or lowered to allow for use by someone with a disability as required by MA AAB 521 CMR, section 30.11.

Both restrooms were found to have doors accessing the same parlor room. We noticed both those doors have inaccessible door hardware. We recommend those be replaced with paddle type handles allowing for access as required by MA AAB 521 CMR 26.11.1.

**Locker Rooms:** We found there are no ADA accessible toilets in either Locker Room. We recommend removing one toilet in each restroom and replacing it with an accessible toilet as per ADA 2010 Standards Priority 3 Toilet Rooms Section 403, as well as Section 603.4. (Please see the diagrams included on page 19 of this report) We also found that there is not an accessible urinal located in the Men’s Locker room. We recommend that one be installed as required by ADA Section 4.18.2 which states “Urinals shall be wall hung with elongated rim at a maximum 17 inches above the finished floor.”
We found that both the Men’s and Women’s Locker room showers are not accessible. We recommend that one shower in each locker room be made accessible as is required by ADA Section 4.23.6 which states “If showers are provided then at least one accessible shower shall be provided.”

The ADA team also noted that the Locker room restrooms measured only 54” x 86” which is too small for use by people with disabilities. We recommend that the stall be widened as required by ADA Section 4.17.3 requires clear floor space of minimum 60” x 56” per accessible wheelchair stalls.

**Locker Room Restrooms:** We found both the Men’s and Women’s locker rooms do not have accessible lockers available at this time. That is required by the ADA which states “Clearance in front of locker must be a minimum of 24” away from the lockers and 30” in width along the lockers.” Salsbury’s is a company that sells ADA accessible lockers and recommends clearance of 60”, circular to allow for a wheelchair to turn.

The ADA team also determined that the soap dispenser in both the Men’s and Women’s Locker rooms are too high off the ground. We recommend they both either be lowered or replaced with accessible dispensers to comply with the MA AAB 521 CMR section 30.12.

The ADA basically requires that a minimum of one accessible locker be provided in all of the four locker rooms. Information concerning how to find ADA accessible lockers is included with this report.

The Massachusetts AAB also requires: as required by MA AAB section 19.6.1. Specifically states that: “Recreational facilities shall comply with 521 CMR, and they shall include but not be limited to courts, rinks, swimming pools, gymnasiums, stadiums, health and sports clubs, radio control facilities, whirlpools, Jacuzzis, gyms, weightlifting areas:
“All areas open to and used by the public, including but not limited to locker rooms, shower facilities, saunas, steam rooms, sun tanning rooms, weight rooms, aerobics and dance rooms, tennis, racquet and squash courts and spectator areas in recreation facilities shall be accessible.”

We found that in both the Men’s and Women’s Locker rooms there were no accessible door knobs on any of the stalls. We recommend the installation of accessible door knobs as required by MA AAB, section 26.11.1.

**Stairs:** We found that the railings provided on the stairs leading down to the basement next to the Coat Room are not currently oval or round. We recommend these railings be replaced with oval or round railings. We found that there is only one railing on the steps that lead from the function hall to the pool area. We recommend a second railing be installed as required by the ADA 2010 Standards Section 505.2.

**Signage:** The ADA team found that there is no directional sign informing people with disabilities of the accessible path to get to the Men’s and Women’s Locker rooms. We recommend a directional sign be posted at the function hall entrance informing people of the accessible entrance to the locker rooms. This is required by the ADA 2010 Standards Section 216.6. As concerns signage at the Groton Country Club, the ADA team strongly recommends that a sign be developed and posted informing guests of ADA amenities such as the golf carts.

In fact, we were informed by The Town of Groton that they already use golf carts to assist people ascending the hilly walkways to the pool and golf areas. Therefore, we suggest a sign reading for example; “golf carts are available to assist in navigating the activities at the Club. Please see a staff member for more information’.
Other Ammenities: We found that the pool does not have a pool lift. We recommend the Country Club provide for the availability of a pool lift as required by MA AAB section 19.6.1. Specifically, MA AAB, section 19.1 “GENERAL: Recreational facilities shall comply with 521 CMR, Recreational facilities shall include but not be limited to courts, rinks, swimming pools, gymnasiums, stadiums, health and sports clubs, radio control facilities, whirlpools, Jacuzzis, gyms, weightlifting areas:

“All areas open to and used by the public, including but not limited to locker rooms, shower facilities, saunas, steam rooms, sun tanning rooms, weight rooms, aerobics and dance rooms, tennis, racquet and squash courts and spectator areas in recreation facilities shall be accessible.”

Additionally, The Massachusetts AAB regulations, section 19.2 water facilities state that:

“Swimming pools, lap pools, wading pools, diving pools used for scuba or general swimming, and whirlpools and Jacuzzis in all locations subject to 521 CMR shall be accessible.”

Coat Room: We found that the Coat Room in the function hall does not have any accessible coat hooks. We recommend installing an accessible coat rack as required by MA AAB Section 30.5 Part E.

Bar/Function Hall: The ADA team found that there is not an accessible portion of the bar located in the function hall. We recommend a 3 foot accessible section be added to the bar as recommended by the ADA 2010 Standards Section 904.4 “There shall be clear floor space of 36 inches wide x 48 inches long for a forward and parallel approach to the bar.”

The source of the following information is from The Disability Rights and Education Defense Fund (DREDF): “If the bar exceeds 34 inches in height, a 60-inch long portion of the counter must be lowered, where it is readily achievable, to between 28 and 34
inches from the floor to the top of the bar with knee space at least 27 inches high, 30 inches wide, and 19 inches deep, for customers who use wheelchairs.”

Another acceptable, and inexpensive recommendation is to provide accessible tables within the same service area.

According to the ADA, wheelchair accessible tables must, where practical, be distributed throughout the establishment. Accessible tables must be between 28 and 34 inches from the floor to the top of the table if readily achievable. Keep a list of accessible tables so the person who seats customers will be able to direct customers using wheelchairs to accessible tables.

When individuals wish to transfer from her or his wheelchair to a regular seat, it is suggested that restaurant staff offer to remove the wheelchair to an out-of-the-way location.

At least five percent of the function hall’s fixed tables must be accessible if readily achievable. Accessible tables (28-34 inches high) must, where practical, be distributed throughout the restaurant. For establishments with fewer than 20 tables, at least one table must be accessible. This provision is, in many cases, easy and inexpensive to meet by removing several of the fixed seats (but leaving the tables) and replacing them with seats that can be removed for a customer who uses a wheelchair. This measure also creates aisles wide enough to people using wheelchairs or other mobility devices to negotiate.

In many instances, a function hall may be able to create access aisles wide enough for passage by people with mobility impairments by removing some fixed seats and replacing them with moveable seats. If this is not readily achievable, restaurants may be able to put accessible tables near entrances or close to service counters.
Thank you,

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Grant Murphy
ADA Coordinator

The ADA team found that there is no curb cut on the sidewalk near the HP accessible parking spaces on the golf course side of the function hall. We recommend that curb cuts be installed at this location allowing for a fully accessible path from the accessible parking to the entrance.
The ADA team found that the slope of the walkway to the accessible entrance is too steep. We recommend the installation of handrails on both sides to achieve fuller ADA compliance and increase safety. We found that there is ¾ inch crack on the sidewalk surface of the accessible entrance of the function hall. We recommend that the crack be filled in and repaired as recommended by Massachusetts AAB, section 2.6, “accessible features must be kept maintained at all times.”
There is a dumpster currently blocking the designated HP accessible parking space that is located at the accessible entrance. We recommend the dumpster be relocated to allow for the accessibility of that parking space. There is not a designated "Van Accessible" parking space at Groton Country Club. We recommend that a "Van Accessible" sign be purchased and mounted where the current accessible HP parking space is located.
There are no ADA accessible toilets in either restroom with the height of each seat ranging from 17 – 19 inches above the ground. We recommend removing one toilet in each restroom and replacing it with an accessible toilet as per ADA 2010 Standards Priority 3 - Toilet Rooms, as well as Section 603.4.
The ADA team found that there is not an accessible section of the bar located in the function hall. We recommend a 3 foot accessible section be installed at the bar as recommended by the ADA 2010 Standards Section 904.4 “There shall be clear floor space of 36 inches wide x 48 inches long for a forward and parallel approach to the bar.”

According to The Disability Rights and Education defense Fund (DREDF): "If the bar exceeds 34 inches in height, a 60-inch long portion of the counter must be lowered, where it is readily achievable, to between 28 and 34 inches from the floor to the top of the bar with knee space at least 27 inches high, 30 inches wide, and 19 inches deep, for customers who use wheelchairs.”
Examples of ADA Accessible lockers:

**Lyon Ada Locker DD5420SU Single Tier 12x18x48-5/8, 1-Wide Assembled Gray**

Email Print

**Item #:** T9F239916GY  
**Sold By:** globalindustrial.com  
**Usually ships in 15 to 18 days**  
0 reviews | [Write a review]  
**List Price:** $436.49 Save up to **19%**  
**Price:** $354.95

- Lyon Locker DD52223 Double Tier 12x18x36 3-Wide Recessed Handle Ready to Assemble Gray

- Lyon Ada Locker DD5420 Single Tier 12x18x48-5/8, 1-Wide

Lockers.com provides-  
**ADA Compliant Metal Lockers** The Americans with Disabilities Act (ADA) specifies certain requirements that affect metal lockers. Only Salsbury single tier, double tier and triple tier metal lockers will meet those requirements. To comply, at least 5% of the lockers provided, but no less than one locker, needs to meet the ADA requirements.

<table>
<thead>
<tr>
<th>Single Tier Lockers</th>
<th>Double Tier Lockers</th>
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<tr>
<td>For single tier lockers, the shelf and coat hooks must be lowered to no more than 48” above the floor. An extra shelf needs to be added to bring the bottom of the locker to no lower than 15” above the floor. Extra shelves can be ordered as options upon request. In addition, only recessed handles meet the ADA specifications.</td>
<td>On double tier lockers, an extra shelf needs to be added to bring the bottom of the locker to no lower than 15” above the floor. Only the lower opening may be used for ADA compliance. Extra shelves can be ordered as options upon request. In addition, only recessed handles meet the ADA specifications.</td>
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**ADA Compliant Single Tier Locker**  
**ADA Compliant Double Tier Locker**
**Triple Tier Lockers**
On triple tier lockers, an extra shelf needs to be added to bring the top of the middle locker and bottom of the lower locker to 48" and 15" above the floor respectively. Only the middle and lower openings may be used for ADA compliance. Extra shelves can be ordered as options upon request. In addition, only recessed handles meet the ADA specifications.

**ADA Compliant Triple Tier Locker**
Only the middle and lower openings may be used for ADA compliance.

Add full length shelf at 48” above floor.

Shelf 15” above floor.

Shelves.

Recessed handles.

Front View

Side view
Example of an ADA Accessible Pool Lift:
Aqua Creek Ranger Pool Lift ADA  $2995.00

We recommend the Country Club acquire one pool lift to service the pool, as suggested by the Massachusetts AAB, section 19.6.1. Examples of such lifts are included with this report. The AAB specifically delineates: "Recreational facilities shall comply with 521 CMR, and they shall include but not be limited to courts, rinks,
swimming pools, gymnasiums, stadiums, health and sports clubs, radio control facilities, whirlpools, jacuzzis, gyms, weightlifting areas, ...All areas open to and used by the public, including but not limited to locker rooms, shower facilities, saunas, steam rooms, suntanning rooms, weight rooms, aerobics and dance rooms, tennis, racquet and squash courts and spectator areas in recreation facilities shall be accessible.”

-ADA compliant
Economical, durable and reliable

**Specific ADA requirements for toilets:**

604.2 Location. The water closet shall be positioned with a wall or partition to the rear and to one side. The centerline of the water closet shall be 16 inches (405 mm) minimum to 18 inches (455 mm) maximum from the side wall or partition, except that the water closet shall be 17 inches (430 mm) minimum and 19 inches (485 mm) maximum from the side wall or partition in the ambulatory accessible toilet compartment specified in 604.8.2. Water closets shall be arranged for a left-hand or right-hand approach.

*Figure 604.2 Water Closet Location*
604.3 Clearance. Clearances around water closets and in toilet compartments shall comply with 604.3.

604.3.1 Size. Clearance around a water closet shall be 60 inches (1525 mm) minimum measured perpendicular from the side wall and 56 inches (1420 mm) minimum measured perpendicular from the rear wall.

**Figure 604.3.1 Size of Clearance at Water Closets**

604.3.2 Overlap. The required clearance around the water closet shall be permitted to overlap the water closet, associated grab bars, dispensers, sanitary napkin disposal units, coat hooks, shelves, accessible routes, clear floor space and clearances required at other fixtures, and the turning space. No other fixtures or obstructions shall be located within the required water closet clearance.