Americans with Disabilities Act-ADA
Self-Evaluation/Transition Plan for the Town of Groton
Groton, MA 01450

Project Synopsis
This project provided surveys that define areas that may not currently fully comply with the Federal Americans with Disabilities Act (ADA) Accessibility Guidelines, and The State Architectural Access Board requirements, (521CMR). We have provided 24 surveys of the physical accessibility needs, and included a list of specific recommendations which will improve compliance with 24 Active Recreation Sites listed below. To assist with achieving compliance with the ADA, The NILP has been pleased to provide monitoring self-evaluations at these specific recreation sites, for inclusion with the Town’s Open Space and Recreation Plan, etc. We understand the Town of Groton, Massachusetts is now ensuring compliance with the requirements.

Table of Contents
(Click to jump to page)

1. Baddacook Pond Boat Launch
2. Bates Conservation Land
3. Bertozzi Wildlife Area
4. Cow Pond Brook Fields
5. Cutler Field
6. Farmer’s and Mechanics (Jenkins Road)
7. Fitch’s Bridge
8. Flat Pond
9. Gamlin Crystal Springs Area
10. Hazel Grove Park
11. Knowles Siding
12. Lawrence Playground
13. Legion Common
14. Lost Lake Boat Launch
15. Nashua River Rail Trail
16. Petapawaug Canoe Launch Area
17. Rich State Forest
18. Rider Basketball Court
19. Sargisson Beach
20. Surrenden Farm
21. Town Forest
22. Wheeler Park
23. Williams Barn
24. Woitiwicz Field
25 ADA Transition Planning tools and resources

26. Suggested ADA Policies, procedures and practices
27 Accessible Picnic Tables
28 Accessible play equipment examples
29 Town of Groton and NILP ADA Consulting Contract
30 Prices for Signage, and Miscellaneous access needs
Number 8. Americans with Disabilities Act-ADA
Self-Evaluation/Transition Plan for the Town of Groton
Flat Pond
Townsend Road and Lakin Street
Groton, MA 01450
Number 9. Americans with Disabilities Act-ADA
Self-Evaluation/Transition Plan for the Town of Groton

Gamlin Land
Fitch’s Bridge Road

Michelle Collette,
ADA Coordinator
Land Use Director/Town Planner,
And The Groton Commission on Accessibility
Town Hall, 173 Main Street
10. Americans with Disabilities Act-ADA
Self-Evaluation/Transition Plan Survey for the Town of Groton

Hazel Grove Park
Aka: The Fairgrounds
Address: Jenkins Road

Groton, MA 01450
12. Americans with Disabilities Act-ADA
Self-Evaluation/Transition Plan for the Town of Groton
Lawrence Playground
Address: Broad meadow Road
Groton, MA 01450
16. Americans with Disabilities Act-ADA
Self-Evaluation/Transition Plan for the Town of Groton
Petapawaug Canoe Launch Area
Nod Road
Groton, MA 01450
17. Rich State Forest
Americans with Disabilities Act-ADA
Self-Evaluation/Transition Plan for the Town of Groton

Rich State Forest
Nod Road
Groton, MA 01450
18. Americans with Disabilities Act-ADA
Self-Evaluation/Site Access Survey for the Town of Groton
Rider Basketball Court
Lost Lake Drive
19. Americans with Disabilities Act-ADA  
Self-Evaluation/Site Access Survey for the Town of Groton  
Sargisson Beach Recreational Area  
**Address:** 171 Whiley Road  
Groton, MA 01450
20. Americans with Disabilities Act-ADA
Self-Evaluation/Site Access Survey for the Town of Groton
Surrendin Farm, aka:
The General Field Conservation Area
Shirley Road, Groton, MA 01450
21. Town Forest
90 Town Forest Road
Americans with Disabilities Act-ADA
Self-Evaluation/Site Access Survey for the Town of Groton
22. Wheeler Park
Americans with Disabilities Act-ADA
Self-Evaluation/Site Access Survey for the Town of Groton
Townsend Road
Groton, MA 01450
Number 24
Americans with Disabilities Act-ADA
Self-Evaluation/Site Access Survey for the Town of Groton
Woitowicz Field
Forge Village Road
Groton, MA 01450
23. Americans with Disabilities Act-ADA
Self-Evaluation/Site Access Survey for the Town of Groton
William’s Barn
Address: Chicopee Row
Groton, MA 01450
Site Assessments
Groton, MA
Number One

Americans with Disabilities Act-ADA
Self-Evaluation/Transition Plan for the Town of Groton
Baddacook Pond Boat Launch
Martin’s Pond Road
Groton, MA 01450

Michelle Collette, ADA Coordinator
Land Use Director/Town Planner
Town Hall, 173 Main Street
Groton, MA 01450

James Lyons, our Americans with Disabilities Act (ADA) Consultant, completed an ADA self-evaluation on August 10, 2015. The ADA requirement for The Baddacook Pond Boat Launch is that it be operated in such a way that, when viewed in its entirety, the park is readily accessible to and useable by people with disabilities. The ADA refers to this as the program accessibility standard, and it is one of the most important concepts in ADA compliance. Also, the field has been brought into compliance with the ADA as well as Commonwealth of Massachusetts Architectural Access Boards regulations (521 CMR). Title II of The ADA prohibits discrimination against qualified individuals with disabilities in all programs, services, and activities of public entities. It applies to all state and local governments, their departments and agencies, and any other instrumentalities or special purpose districts of state or local governments.

We appreciate the hospitality of Michelle Collette, Town Planner, and Takashi Tada Conservation Commission who assisted me with providing the tour today.

The Baddacook Pond Boat Launch is owned by the state of Massachusetts, and it is managed by the town. The site consists of one boat launch with a bulletin board for posted announcements. We were impressed with much of the ADA compliance at the site. In fact, The Town and The Park Commission, Planning Board, Conservation Commission, Accessibility Commission, Parks Department, and Conservation Commission plans to provide some ADA improvements at the Boat Launch. Companies such as the Nashoba Paddler Co. rents kayaks, canoes, provides a summer camp, etc. In our opinion the following issues were found:
Accessible Parking - There are presently no Designated Accessible (‘HP’) signs already posted at the site. There are no ‘Van accessible” spaces found. The ADA Access Guidelines (ADAAG) require-One space should be a “Van Accessible” space 8 foot wide with an 8-foot access aisle and van accessible sign.

ADAAG section 4.6.4, signage, requires that accessible parking spaces be designated as reserved by an above-ground sign showing the symbol of accessibility. Spaces shall have an additional sign ‘Van Accessible” mounted below the symbol of accessibility. We recommend the town install one van accessible HP parking spot. I have attached a photo of the recommended parking spot. A van space. The best spot in my opinion, is next to the parking for boat access sign. The cost estimate for the signs is approximately $105.00, with a suggested target completion date of December/2016.

Otherwise, it is best to leave the area natural as best can be done, in my opinion. The town informed me that they plan to install the sign accordingly, with each one on its own pole. Signs need to actually be mounted 5 to 8 feet above the ground as per the ADAAG requirements. This is to help prevent mistakes being made when snow/ice, sand etc. covers the signs painted on the ground. We recommend that if the signs be permanently installed at a height of 5 feet above the ground.

In this scenario, I fully concur with the Town’s access improvement plan. I agree with this plan that The Town has adroitly described to me today. In my opinion, this is indeed the optimal way to achieve maximum ADA compliance at this beautiful picturesque site.

In my opinion, The Town is most deserving of kudos for their thoughtful ideas, and effective planning to achieve ADA compliance at the beautiful field. I was informed that The Town has also acquired grants funds to install a new modern ADA accessible swing, and an accessible climbing area in the play area.

Thank You,

James Lyons
Community Development Director
Northeast Independent Living Program, Inc.
The Northeast ADA Access Group
20 Ballard Road,
Lawrence, MA 01843,
Americans with Disabilities Act-ADA
Self-Evaluation/Transition Plan for the Town of Groton
Baddacook Pond Boat Launch
Martin’s Pond Road
August 10, 2015
2.) Americans with Disabilities Act-ADA
Self-Evaluation/Site Access Survey for the Town of Groton
Bates Conservation Land
Old Ayer Road
Groton, MA 01450

To: Michelle Collette, ADA Coordinator
Land Use Director/Town Planner
Town Hall, 173 Main Street
Groton, MA 01450

James Lyons, our Americans with Disabilities Act (ADA) Consultant, completed an **ADA self-evaluation on September 9, 2015**. The ADA requirement for The Bates Conservation Land is that it be operated in such a way that, when viewed in its entirety, the field is readily accessible to and useable by people with disabilities.

The basis for conducting this (municipal) ADA assessment is that it is the optimal way to create an ambiance or climate of equal opportunities for everyone, regardless of disability, to all the services, programs, and activities the Town’s Open Space and Recreational Programs has to offer to the community. The rationale behind the ADA self-evaluation is to provide recommendations that define any/all areas that do not currently comply with the Federal Americans with Disabilities Act (ADA) Accessibility Guidelines, and The State Architectural Access Board requirements, (521CMR). In other words, the reason for completing this activity in harmony with The NILP, is to help us make sure that no one here in the Town of Groton Open Space Recreational Plan gets left out in all pertinent matters. We appreciate the hospitality of Michelle Collette, David Pitkin, of the Greenway Committee, and Bob Pine, of The Groton Conservation Trust who provided me with the tour today.

It is our hope that this ADA Transition Plan will open a new frontier for transmitting information and sharing resources. We hope to educate,
inform and generate increased dedication in the community about the ADA as it pertains to Local governments, as well as those individuals they serve, throughout the Town.

In our opinion the following issues were found:

I am informed that the town recently spent a significant amount of money (approximately $1000.00) to clean up the fields at this site, I am also aware that no events are held at the Bates Land, the area is rarely used, and there are no plans to do so. Bates is described to me as a secondary priority of all the Conservation sites No motorized vehicles are allowed on the Bates Conservation Land.

The Town plans to rebuild the small wooden bridge on the trail. There is a nice Harvey Sargisson built stone picnic table available at the site. Other than the bridge repair, my recommendation therefore is to leave the field, and the woods at this site as is. At this time that is best course of action for the ADA compliance Plan

Thank You,

James Lyons,

Consultant,
Northeast Independent Living Program, Inc.
The Northeast ADA Access Group
20 Ballard Road, Lawrence, MA 01843
To: Michelle Collette, ADA Coordinator
Land Use Director/Town Planner
Groton Commission on Accessibility
Town Hall, 173 Main Street
Groton, MA 01450

August 21, 2015

Subject: Bertozzi Wildlife Area
Townsend Road
Groton, MA 01450

James Lyons, our Americans with Disabilities Act (ADA) Consultant, completed an **ADA self-evaluation on August 10, 2015**. The ADA requirement for The Bertozzi Field Wildlife Area is that it be operated in such a way that, when viewed in its entirety, the park is readily accessible to and useable by people with disabilities. The ADA refers to this as the program accessibility standard, and it is one of the most important concepts in ADA compliance. Also, the field has been brought into compliance with the ADA as well as Commonwealth of Massachusetts Architectural Access Boards regulations (521 CMR). Title II of The ADA prohibits discrimination against qualified individuals with disabilities in all programs, services, and activities of public entities. It applies to all state and local governments, their departments and agencies, and any other instrumentalities or special purpose districts of state or local governments. The Bertozzi Field Wildlife Area is actually owned by the Massachusetts Division of Fisheries and Wildlife. Although the trail existed before, the plaque in the entrance indicates that the Bertozzi was dedicated first in 1975.

Present today were: Jim Lyons, Michelle Collette, Land Use Director/Town Planner, and Alan Taylor of the Groton Commission on Accessibility. Altogether the site consists of: a large trailhead, swimming, fishing, paddling, picnicking, etc., and all the beautiful fields. We were impressed with much of the ADA compliance at the site already. Overall, our goal is to maximize the accessibility of this wonderful outdoor recreation area while protecting the unique characteristics of its natural setting.

*The hiking trail surface:* In our opinion the following remaining issues were found: Presently a large gate partially blocks some of the entrance to the trail and the field essentially in order to prevent large vehicles from getting in, and ruining the trails. However, some accessibility has been created on the side of the gate, where there is a 3.5 foot wide path of travel available. I recommend the town grade the path to make it flat, with a hard-packed surface. It was
suggested that, perhaps the Groton Eagle Scouts can be asked at the suggestion of the Town as an Eagle Scout Merit Badge project.

Since the surface has become weathered, and damaged during the extreme wither, I recommend the trail be re-graded, and the whole trail needs to be trimmed, removing the grass and brush that has overgrown into the trail. Brush and weeds, vegetation has grown into the trail, making it not in ADA compliance, in my opinion.

Also in order to provide maximum safety, and accessibility for all, I recommend the town trim the over hanging brush, and generally landscape, and clean up the trail. There are many large roots that have grown into the trail recently. I recommend they be dug and cut out of the trail.

**Accessible Parking**—There are currently no permanent Designated Accessible (‘HP’) signs posted at the site, and there are no “Van accessible” spaces found. I recommend that four (1) permanent HP (Designated Accessible Parking) being a van space be installed with in-ground pole or sign that is permanent. I recommend the 4 feet van access aisle for the new van accessible space be installed at the spot in front of the barn door -with an estimated completion date of December/2016.

One space must be van accessible as required by the ADA Access Guidelines (The ADAAG), specifically, section 4.6.4 requires that accessible parking spaces “shall designate as reserved by a sign showing the symbol of accessibility. Spaces should have an additional sign ‘Van Accessible’ mounted below the symbol of accessibility.” (Signs need to actually be mounted 5 to 8 feet above the ground as per the ADAAG requirements). This is to help prevent mistakes being made when snow/ice, sand, etc. covers the signs painted on the ground. I recommend: The Town install 1 new accessible (HP) parking space. Estimated cost is $1117.00 for one space, prior to March/2016. (The Means ADA Compliance Pricing Guide).

I applaud the Town of Groton’s affirmative and thoughtful planning to achieve ADA compliance at the beautiful field.

Thank You,

James Lyons
Community Development Director
C/o Northeast Independent Living Program, Inc.
The Northeast ADA Access Group
20 Ballard Road,
Lawrence, MA 01843,

Attachments:
-Bertozzi Field Wildlife Area photos
Number 4.) Americans with Disabilities Act-ADA  
Self-Evaluation/Site Access Survey for the Town of Groton  
Cow Pond Brook Playing Fields  
Address: Cow Pond Brook Road  
Groton, MA 01450  

Michelle Collette, ADA Coordinator  
Land Use Director/Town Planner  
Town Hall, 173 Main Street  
Groton, MA 01450  
Telephone: 978.448.1105  
mcollette@townofgroton.org

James Lyons completed an ADA self-evaluation on June 16, 2015, and we have completed an Americans with Disability Act (ADA) Self-evaluation and Transition Plan. The ADA requirements for The Cow Pond Brook Field is that it be operated in such a way that, when viewed in its entirety, the school is readily accessible to, and useable by people with disabilities. The ADA as the program accessibility standard refers this to, and it is one of the most important concepts in ADA compliance. Also, the field has been brought into compliance with the ADA as well as Commonwealth of Massachusetts Architectural Access Boards regulations (521 CMR). I appreciate the hospitality, ADA/disability sensitivity, and dedication of: Michelle Collette, Land Use Director/Town Planner, Gineane Haberlin, Chairperson, Parks Commission, Matt Frary, Park Commissioner, and Alan Taylor (Commission on Accessibility Issues) who assisted with providing the tour today.

The park consists of three baseball fields, Lacrosse nets, three soccer, and one baseball field, four concession stands, one football field, nature study, wildlife habitat activities, Groton Conservation Trust's Cronin Conservation Land, extensive wetlands abutting Cow Pond Brook, a total of three accessible portable-toilets (Triangle Portable Services), a batting cage/pitching practice court, all of which are currently in good condition. The fields comprise a total area of 33.0 acres. We were impressed with much of the ADA compliance at the site. In fact, The Town and The Planning Department, Accessibility Commission, Park and Conservation Commission have provided some ADA improvements at the extensive site. In our opinion the following issues violations were found:

-I observed that The Groton Youth Baseball concession stand, in my opinion, has a counter that is too high, measuring 47 inches from the ground. I recommend that a 3 foot section of the service counter concession stand be lowered to 34 inches from the ground as per ADAAG section 4.32.4, that requires: “the tops of accessible service counters shall be from 28 inches to 34 inches above the ground.” I suggest a target completion date of December/2016, with an estimated total cost of approximately, $780.00 total including labor. Lowering the counters to a height of 36 inches will make it within the reach of patrons who use wheelchairs.

-Accessible Parking-There are already two HP (designated accessible parking) signs posted on the chain link fence at a height of 49 inches above the ground. Currently, however, there are no ‘Van accessible”
spaces found. The ADA Access Guidelines (ADAAG) require-One space should be a “Van Accessible”
space 8 foot wide with an 8-foot access aisle and van accessible sign.

The ADAAG section 4.6.4 signage requires that accessible parking spaces shall designated as
reserved by a sign showing the symbol of accessibility. Spaces shall have an additional sign ‘Van
Accessible’ mounted below the symbol of accessibility. Signs need to be mounted 5 to 8 feet
above the ground as per the ADAAG requirements. This is to help prevent mistakes being made
when snow/ice, sand etc covers the signs painted on the ground. We recommend that the three
signs be raised to a height of minimum five feet above the ground. The estimated cost is $290.00
for each space, prior to March/2016.

-The east side porta-toilet is only 35 inches wide and I recommend the company be contacted to
change the narrow porta toilet to a fully accessible replacement one, as the others on this site are.

In my opinion, there is ponding of water at the west entrance to the park the GDS entrance.
In my opinion, the concession stand needs an accessible paddle type door handle.

-The outside picnic area was in 2004, and in my opinion already has accessible picnic table with
a cut-away in the table although it could use more knee clearance kudos ins in order to the Town
for already having acquired an accessible picnic table.

The Town explained to me that they have developed a plan to make the main entrance more
accessible, and resolve an issue of patrons parking in a way that blocks the porta toilets and
entrance access. The Town plans to install an apron in the area in front of the portable toilets.
When the field becomes extremely crowded, people tend to park in front of the porta toilets,
which makes them difficult to get to because the vehicles block access to them. The Town’s
affirmative plan is to bump out the chain link fence so that the porta toilets will be in back of the
fence, then install the three more Designated Accessible parking “HP” spaces at this spot.
The plan is to then stripe these accessible spaces only. The accessibility will be greatly
improved, in my opinion by this excellent ADA accessibility (providing an apron, etc.)

After that, the Plan is to pave the whole parking lot in 1020-(Five years from now, that makes a
highly innovative ADA long range transition plan. In summary the Plan is to:
1. Move out the fence (first) by fall september/2017
2. Then pave the three accessible aprking spaces
3. Make an apron so that the toilets are in back of the fence so that vehicles will no longer be
able to block them.

A full perimeter walking track will be constructed by the town and is already planned.
The Town is also acquiring an accessible swing, approximately 4 years from now
-There us a 12 inch step found at the concession stand that is provided at the baseball fields
section of this large field. I suggest therefore that the step be eliminated by building a 12 foot
ramp, with a recommended target completion date of June/2017.

-The snack shack is designated by the town as employee/Baseball Club staff only’ (The
Groton/Dunstable Youth Football is stated on the sign). This makes the stand in Mass AAB as
well as ADA compliance because it is intended for staff use only.
I would like to express my heartfelt Kudos to The Town of Groton for the creative ADA complaint solving process used by the Town in this example. The Town is ADA exemplary in its affirmative action stance concerning ADA compliance.

Thank You,

James Lyons  
Community Development Director  
Northeast Independent Living Program, Inc.  
The Northeast ADA Access Group  
20 Ballard Road,  
Lawrence, MA 01843,
5.) Americans with Disabilities Act-ADA  
Self-Evaluation/Site Access Survey for the Town of Groton  
Cutler Field  
Address: Townsend Road  
Groton, MA 01450

Michelle Collette, ADA Coordinator  
Land Use Director/Town Planner  
Town Hall, 173 Main Street  
Groton, MA 01450

James Lyons, our Americans with Disabilities Act (ADA) Consultant, completed an ADA self-evaluation on June 16, 2015. The ADA requirement for Cutler Field is that it be operated in such a way that, when viewed in its entirety, the park is readily accessible to and useable by people with disabilities. The ADA refers to this as the program accessibility standard, and it is one of the most important concepts in ADA compliance. Also, the field has been brought into compliance with the ADA as well as Commonwealth of Massachusetts Architectural Access Boards regulations (521 CMR). Title II of The ADA prohibits discrimination against qualified individuals with disabilities in all programs, services, and activities of public entities. It applies to all state and local governments, their departments and agencies, and any other instrumentalities or special purpose districts of state or local governments.

We appreciate the hospitality of Michelle Collette, Town Planner, Gineane Haberlin, Chairperson, Parks Commission, Matt Frary, Park Commissioner, and Alan Taylor (Commission on Accessibility member) who assisted me with providing the tour today.

The Cutler Field was first constructed in the late 1960’s. The site consists of several baseball and soccer fields, two sets of slides, two swings, a storage shed (municipal employees only), an open field, and two accessible portable toilets. We were impressed with much of the ADA compliance at the site. In fact, the Town and the Parks Commission, Planning Board, Conservation Commission, Accessibility Commission, Parks Department, and Conservation Commission have provided some ADA improvements at the playground and field. In our opinion the following issues were found:

Accessible Parking-There are a total of four Designated Accessible (‘HP’) signs already posted on the chain link fences at the basketball court, and two at the ball field’s entrance. There are no ‘Van accessible” spaces found. The ADA Access Guidelines (ADAAG) require-One space should be a “Van Accessible” space 8 foot wide with an 8-foot access aisle and van accessible sign.

ADAAG section 4.6.4, signage, requires that accessible parking spaces be designated as reserved by an above-ground sign showing the symbol of accessibility. Spaces shall have an additional sign ‘Van Accessible” mounted below the symbol of accessibility. I have attached a photo of the recommended parking signs.
The town informed me that they plan to install the signs accordingly, with each one on its own pole. Signs need to actually be mounted 5 to 8 feet above the ground as per the ADAAG requirements. This is to help prevent mistakes being made when snow/ice, sand etc. covers the signs painted on the ground. We recommend that all of the signs be raised to a height of 5 feet above the ground.

The Town also plans to install asphalt (blacktop), and make the basketball court accessible from the field’s (side) entrance side and around to the back. In my professional opinion, this is the shortest distance, and the most cost-effective way to make the court accessible to everyone. They already have contingency plans to build a new ADA ramp this fall with a target completion date of December, 2015. Attached, please find the specifications for the ramp. The Town has a budget that they have appropriated for these purposes. This is a highly affirmative approach to achieving ADA compliance. I am informed that The Town also wishes to add a retaining wall in the back. This will also have the added benefit of enhancing the accessible entrance from side to the back, as described above.

In this scenario, I fully concur with the Town’s access improvement plan. I agree with this plan that The Town has adroitly described to me today. In my opinion, this is indeed the optimal way to achieve maximum ADA compliance at this field.

In my opinion, The Town is most deserving of kudos for their thoughtful ideas, and effective planning to achieve ADA compliance at the beautiful field. I was informed that The Town has also acquired grants funds to install a new modern ADA accessible swing, and an accessible climbing area in the play area.

Thank You,

James Lyons
Community Development Director
Northeast Independent Living Program, Inc.
The Northeast ADA Access Group
20 Ballard Road,
Lawrence, MA 01843,
James Lyons, Northeast ADA Consultants
6.) Americans with Disabilities Act-ADA
Self-Evaluation/Site Access Survey for the Town of Groton

Farmer’s and Mechanics
Address: Jenkins Road
Groton, MA 01450

To: Michelle Collette, ADA Coordinator
Land Use Director/Town Planner
Town Hall, 173 Main Street
Groton, MA 01450

Present:
Caroline Perkins, Planning Board Chairman
Edward Perkins, Stormwater Committee Chairman
Alan Taylor, Groton Commission on Accessibility,
Michelle Collette, Land Use Director/Town Planner
Consultant, James Lyons, of The NILP

James Lyons, our Americans with Disabilities Act (ADA) Consultant, completed an ADA self-evaluation and The Transition Plan on September 9, 2015. The ADA requirement for The Farmer’s and Mechanics is that it be operated in such a way that, when viewed in its entirety, the park is readily accessible to and useable by people with disabilities. The ADA refers to this as the program accessibility standard, and it is one of the most important concepts in ADA compliance. Also, the field has been brought into
compliance with the ADA as well as Commonwealth of Massachusetts Architectural Access Boards regulations (521 CMR). Title II of The ADA prohibits discrimination against qualified individuals with disabilities in all programs, services, and activities of public entities. It applies to all state and local governments, their departments and agencies, and any other instrumentalities or special purpose districts of state or local governments.

Rationale:

The basis for conducting this (municipal) ADA assessment and its transition Plan is that it is the optimal way to enhance the climate of equal opportunities for everyone, regardless of disability, to all the services, programs, and activities the Town’s Open Space and Recreational Programs has to offer. The rationale behind the ADA self-evaluation is to provide recommendations that define areas that do not currently comply with the Federal Americans with Disabilities Act (ADA) Accessibility Guidelines, and The State Architectural Access Board requirements, (521CMR). In other words, the reason for completing this activity in partnership with The NILP, is to help all of us make sure that no one here in the Town of Groton Open Space Recreational Plan gets left out in all pertinent matters. The Farmers and Mechanics is run (managed) by the Groton Conservation Commission.

The Town of Groton acquired the property by eminent domain in 1967. Farmers and Mechanics site is located along the Nashua River and is adjacent to to the Groton fairgrounds site. The site is comprised of a total of two trails- that are offered at the site. One is a wonderful walking trail from the fairgrounds to the Nashua River, while the other trail goes all the way to Fitch’s Bridge. This is indeed a beautiful, natural trail where visitors enjoy activities including: hiking, jogging, skiing, wildlife habitat, picnicking, etc. Access is from Jenkins Road off Mill Road.

-Restroom: The portable toilet is inaccessible and my recommendation to request a fully accessible one is also contained in my Fairgrounds report since the Groton Fairgrounds land abuts the Farmers and Mechanics trail. I suggest using the Transition Plan target completion goal date of approximately April/2016.

-Parking recommendations: There are no accessible parking spaces provided at this time at the site. In fact, there is no parking provided for the public none has ever been offered. We found there is no HP parking spaces no van either provided. Therefore, my recommendation is to install one van accessible parking HP space at The Farmer’s and Mechanics. The accessible parking in my opinion, needs to be designated at the trailhead. Accordingly, The ADA Access Guidelines (ADAAG) require-one space should be a “Van
Accessible” space that is 8 foot wide with an 8-foot access aisle and van accessible sign. For the ADA Transition Plan, I recommend a van accessible sign be posted. I suggest using the Transition Plan target completion goal date of approximately December/2015.

The pertinent regulations are as follows: specifically, *ADAAG, section 4.6.4*, signage, requires that accessible parking spaces shall be designated as reserved by a sign showing the symbol of accessibility. Spaces shall have an additional sign stating, ‘Van Accessible’ mounted below the symbol of accessibility. Signs need to be mounted 5 to 8 feet above the ground as per the ADAAG requirements”. This is to help prevent mistakes being made when snow/ice, sand etc covers the signs painted on the ground we recommend that the van sign be installed at a height of five-eight feet. The cost estimate for the space is approximately $1117.00 with a suggested target completion date of December/2015.

In my opinion, The Town, along with its pertinent volunteer Boards is most deserving of kudos for their innovative actions, and effective planning to achieve ADA compliance at the Farmer’s and Mechanics.

Thank You,

James Lyons
Community Development Director
Northeast Independent Living Program, Inc.
The Northeast ADA Access Group
20 Ballard Road,
Lawrence, MA 01843
Farmer’s and Mechanics is a wonderful walking trail from the fairgrounds to the Nashua River, while it is a beautiful, natural trail.
To: Michelle Collette, ADA Coordinator  
Land Use Director/Town Planner  
Groton Commission on Accessibility  
Town Hall, 173 Main Street  
Groton, MA 01450

Subject: *Fitch’s Bridge*  
Pepperrell Road  
Groton, MA 01450

August 10, 2015

*Present:*  
Michelle Collette, Land Use Director/Town Planner  
Bob Fleishor, (GCA) who drove his car-pool today for ADA surveyors  
David Pitkin, Greenway Committee  
Takashi Tada, Groton Conservation Commission Administrator  
James Lyons, NILP

James Lyons, our Americans with Disabilities Act (ADA) Consultant, completed an ADA self-evaluation on August 10, 2015. Title II of The Americans with Disabilities Act (ADA) applies to all state and local governments, their departments and agencies, and any other
 instrumentalities or special purpose districts of state or local governments. The goal of this self evaluation is to plan how to make an existing facility accessible and more usable to people with disabilities. The US Department of Justice recommends the development of an ADA Transition implementation plan specifying the steps what improvements we will make to remove barriers and when each solution will be carried out. The plan below is in fact evidence of good faith effort to fully comply with The ADA. Please keep in mind that full compliance is required with the ADAAG standards only for new construction and alterations. The recommendations are offered as a guide to help the town determine what are readily achievable barrier removals in existing facilities in my opinion.

The Fitch’s Bridge was originally built in 1812, with a replacement (refurbishment) being completed about 3 years ago (2011). Fitch’s Bridge is managed by the Greenway Committee, and Groton DPW takes care of maintenance at the site. The wonderful opportunities that the site offers include: hiking, exploring, fishing, training bird watching, and there is heavy equestrian use of the site. The Greenway Committee manages the site, and Groton Department of Public Works (DPW) is responsible in charge of maintenance at Fitch’s bridge. In our opinion the following accessibility issues were found:

-There are no accessible parking spaces provided at this time at the site. Therefore, my recommendation is to install one van accessible parking HP space. Accordingly, The ADA Access Guidelines (ADAAG) require—one space should be a “Van Accessible” space that is 8 foot wide with an 8-foot access aisle and van accessible sign. For the ADA Transition Plan, I recommend a van accessible sign be posted.

Specifically, the ADAAG, section 4.6.4, signage, requires that accessible parking spaces shall be designated as reserved by a sign showing the symbol of accessibility. Spaces shall have an additional sign stating, ‘Van Accessible’ mounted below the symbol of accessibility. Signs need to be mounted 5 to 8 feet above the ground as per the ADAAG requirements”. This is to help prevent mistakes being made when snow/ice, sand etc covers the signs painted on the ground we recommend that the van sign be installed at a height of five-eight feet. The cost estimate for the space is approximately $1117.00 with a suggested target completion date of December/2016. See the attached Fitch’s Bridge photo for the specific area.

-At the entrance to Fitch’s Bridge we found two large, heavy concrete blocks have been placed at both Bridge entrances by the town in order to keep motorized vehicles out of Fitch’s Bridge. We need 48 inches clearance at the Bridge entrances.
We measured, and found there is only 29 inches clearance on the right side of the concrete mounting block (facing the bridge) that prevents accessibility to the Bridge. **My recommendation is to move one of the mounting blocks to the side on both sides of the bridge, in order to provide 48 inches of clearance for people with disabilities.**

As described, we found this (cement blocks that block accessibility) to be the case on both sides of the bridge, where there is in my opinion not adequate space for a visitor (for example using a wheelchair) to pass at both sides of the bridge. We measured both sides carefully, and found –the clearance measures 23 inches on the far side of the Bridge.

Specifically, we found the following:
On the far side of the wooden bridge, (See photos for the blocks)

- Clearance measures **32 inches on the right side**
- **45 inches on the left side** the right concrete block (facing the bridge)
- and there is **3 feet between the 2 blocks**.

At the end of the bridge on the right is a private road.

- We discussed, and recommend the Town’s additional available option of posting 2 new signs- stating ‘no motorized vehicles allowed except for electric wheelchairs, track vehicles, and other mobility aids used by people with disabilities”.

Thank You,

James Lyons
Northeast Independent Living Program, Inc.
20 Ballard Road,
Lawrence, MA 01843
Tel: (978) 687-4288 v/tty
Fax: (978) 689-4488
Groton’s wonderful landmark, the new Fitch’s Bridge.

We found that there is 29 inches clearance on the right side of the concrete mounting block (facing the bridge) that prevents accessibility to the Bridge. The recommendation is to move one of the mounting blocks to the side on both sides of the bridge, in order to provide 48 inches of clearance for people with disabilities.
To: Michelle Collette, ADA Coordinator
Land Use Director/Town Planner
Groton Commission on Accessibility
Town Hall, 173 Main Street
Groton, MA 01450

James Lyons, our Americans with Disabilities Act (ADA) Consultant, has completed an **ADA self-evaluation and Transition Plan on August 10, 2015**. The ADA requirement for The Flat Pond Boat Launch is that it be operated in such a way that, when viewed in its entirety, the park is readily accessible to and useable by people with disabilities. The ADA refers to this as the program accessibility standard, and it is one of the most important concepts in ADA compliance. Also, the field has been brought into compliance with the ADA as well as Commonwealth of Massachusetts Architectural Access Boards regulations (521 CMR). Title II of The ADA prohibits discrimination against qualified individuals with disabilities in all programs, services, and activities of public entities. It applies to all state and local governments, their departments and agencies, and any other instrumentalities or special purpose districts of state or local governments.

Present today were:

Michelle Collette, Land Use Director/Town Planner,
Alan Taylor, member of the Groton Commission on Accessibility.
Jim Lyons, ADA Consultant

The Flat Pond Boat Launch is owned by the Town of Groton, and is included among the Conservation Commission properties with the assistance of the Parks Commission. It was acquired in 1989, and the area is used for launching water craft, fishing, ice fishing, kayaking, skating, natural wildlife habitat, etc. The site comprises a total of 12.70 acres and presently there is no accessible parking because the area in not large enough, and the terrain does not support the installation of an accessible (HP) space in my opinion. Since there is a considerable slope, and flooding on the boat ramp, I do not recommend adding an accessible space at this time, unless it is requested as a reasonable accommodation (RA). The installation of an HP space is technically unfeasible due to the hilly, and muddy topography of the land, as well as other key factors in my opinion. The safety station was installed by James Roberts as an Eagle Scout Project in 2004.

The Flat Pond Boat Launch site is a terrain-based endeavor. It is currently impossible to provide full access to all areas of this site because to do so would
destroy the woods, and alter the function and purpose of the natural wilderness based boat launch activities that are offered here.

Other reasonable accommodations (RA’s), and access needs should be provided, if or when requested. The ADA requirement for The Town’s Recreation and Open Space plan is that all services and programs be operated in such a way that, when viewed in their entirety, the program is readily accessible to and useable by people with disabilities.

However, the trail brush has grown into the area, and can be cut, and cleaned up with a weed whacker. I recommend the trail be re-graded, and the whole trail needs to be trimmed, removing the grass and brush that has overgrown into the trail. Brush and weeds, vegetation has grown into the ramp area, making it not in ADA compliance, in my opinion.

Also in order to provide maximum safety, and accessibility for all, I recommend the town trim the brush, and generally landscape and clean up the boat ramp area as best as feasible. There are some roots, and brush that have grown into the trail recently. The cost estimate for the landscaping/clean-up is approximately $607.00 with a suggested target completion date of December/2016.

Under Federal Law, no qualified handicapped person shall, on the basis of handicap, be excluded from participation in, be denied the benefits of, or otherwise be subject to discrimination under any program or activity that receives Federal financial assistance. A key mechanism for ensuring compliance with this requirement is the ADA (Americans with Disabilities Act) Self-Evaluation, which is a required component of all Open Space and Recreation Plans.

The ADA Self-Evaluation determines how accessible a community’s conservation and recreation programs and properties are to people with disabilities. It is a useful diagnostic tool for the community to recognize any shortcomings of the existing programs and develop a plan to remedy them. In addition to making sites accessible, these ADA improvements also result in more comfortable and safer parks, trails, and conservation and recreation programs.

**What is a qualified person with a disability under the ADA?**

- **Terminology:** The preferred term is "people with disabilities".
- **Employment:** The individual can perform the essential job functions with or without reasonable accommodation.
- **Programs, Activities:** The individual meets essential eligibility requirements.

**What is a reasonable accommodation?**

- Reasonable accommodations can include renovating a building to make it accessible, restructuring a job by changing the work schedule, buying specialized equipment, and hiring others as readers or interpreters.

**Technical definition of an"ADA Self-Evaluation"?**
• The self-evaluation is a detailed assessment of the administrative, procedures, and management practices of the recreation department and Conservation Commission. It also includes a site-by-site inventory that the Town has conducted during the summer of 2015, incorporating all recreation and conservation areas and buildings, programs or services and a transition plan where changes are necessary to make these parks, trails, programs, or services accessible.

**What is included in this inventory?**

This inventory only involves properties under the jurisdiction of the Groton Conservation Commission and recreation departments. (This Transition Plan does not include the Town Hall, Library, etc.). We selected the 26 sites most frequently used by the public for the ADA self-evaluation plan.

**What is Programmatic Accessibility?**

A key phrase is that the programs offered must be accessible when "viewed in their entirety." The requirements for Town’s Recreation and Open Space plan, according to the ADA, is that all services and programs be operated in such a way that, *when viewed in their entirety*, the program is readily accessible to and useable by people with disabilities. This means that not every boat launch in town is required to be fully accessible, as described above.

Thank You,

James Lyons
Community Development Director
Northeast Independent Living Program, Inc.
The Northeast ADA Access Group
20 Ballard Road,
Lawrence, MA 01843,
James Lyons, Northeast ADA Consultants
9.) Americans with Disabilities Act-ADA
Self-Evaluation/Transition Plan for the Town of Groton

Gamlin Picnic Site
Fitch’s Bridge Road

To: Michelle Collette, ADA Coordinator
Land Use Director/Town Planner
Groton Commission on Accessibility
Town Hall, 173 Main Street
Groton, MA 01450

Subject: Gamlin Picnic Site
Pepperrell Road
Groton, MA 01450

September 09, 2015

Present:
- Michelle Collette, Land Use Director/Town Planner
- Bob Pine Groton Conservation Trust (Who drove his car for all to the Gamlin Picnic Site),
- David Pitkin, Greenway Committee Chairman
- James Lyons, NILP consultant for The Town of Groton

I greatly appreciate the hospitality of Michelle Collette, David Pitkin, of the Greenway Committee, and Mr. Bob Pine of the Groton Conservation Trust who kindly provided me with the tour today. This is a picturesque picnic site offered along The Nashua River, and is managed by The Groton Conservation Trust, and it is riverfront property.

James Lyons, our Americans with Disabilities Act (ADA) Consultant, completed an ADA self-evaluation on August 10, 2015. Title II of The Americans with Disabilities Act (ADA) applies to all state and local governments, their departments and agencies, and any other instrumentalities or special purpose districts of state or local governments. The goal of this self evaluation is to plan how to make an existing facility accessible and more useable to people with disabilities. The US Department of Justice recommends the development of an ADA Transition Implementation plan specifying the steps what improvements we will make to remove barriers and when each solution will be carried out. The plan below is in fact evidence of good faith effort to fully comply with The ADA. Please keep in mind that full compliance is required with the ADAAG
standards only for new construction and alterations. The recommendations are offered as a guide to help the town determine what are readily achievable barrier removals in existing facilities in my opinion.

This is a beautiful 1 acre lot total 250 feet wide. The small and lovely site was actually given by Robert Gamlin in 1988, and it can be accessed via the Fitch’s Bridge Road near the intersection of Gratuity Road. Gamlin Land is managed by the Groton Conservation Trust. (The Conservation Trust is a private, non-profit organization, and is not part of Town government). The wonderful opportunities that the site offers include: picnicking, hiking, exploring, bird watching, etc. It is nicely situated at the confluence of Tuity Brook and The Nashua River and offers an excellent picnic spot with a superlative view of the River. A short trail provides a loop through the property that includes a picnic site along the Nashua River at the trail’s midpoint. The woods contain a variety of deciduous, white pine, maple, red oak, ash, horse chestnut, and conifer trees. In our opinion the following accessibility issues were found:

-There are no accessible parking spaces provided at this time at the site. In fact, there is no parking provided for the public none has ever been offered. Therefore, my recommendation is to install one van accessible parking HP space at The Gamlin Land. Accordingly, The ADA Access Guidelines (ADAAG) require-one space should be a “Van Accessible” space that is 8 foot wide with an 8-foot access aisle and van accessible sign. For the ADA Transition Plan, I recommend a van accessible sign be posted.

The pertinent regulations are as follows: specifically, ADAAG, section 4.6.4, signage, requires that accessible parking spaces shall be designated as reserved by a sign showing the symbol of accessibility. Spaces shall have an additional sign stating, ‘Van Accessible’ mounted below the symbol of accessibility. Signs need to be mounted 5 to 8 feet above the ground as per the ADAAG requirements”. This is to help prevent mistakes being made when snow/ ice, sand etc covers the signs painted on the ground we recommend that the van sign be installed at a height of five-eight feet. The cost estimate for the space is approximately $1117.00 with a suggested target completion date of December/2016.

See the attached Gamlin Land photos for the specific areas.

-At this time, there are no accessible picnic tables provided at the site. I therefore recommend that the town acquire a replacement accessible picnic table for the Gamlin Land. The estimated cost is approximately $700.00-$770.00 for the accessible table with a suggested target completion date of December/2016.
-In order to increase safety, and use ability for patrons with disabilities, the plan is to add a partial stone dust path that will provide an improved hard packed surface for the beginning part (entrance areas) of the trail.

-We discussed, and recommend the Town’s additional available option of posting 2 new signs- stating ‘no motorized vehicles allowed except for electric wheelchairs, track vehicles, and other mobility aids used by people with disabilities”. These are the best actions to take for ADA compliance, in my opinion, other that these transition plan steps above, it is optimal to leave Gamlin Land in its current natural setting in my opinion.

Thank You,

James Lyons
Northeast Independent Living Program, Inc.
20 Ballard Road,
Lawrence, MA 01843
Tel: (978) 687-4288 v/tty
Fax: (978) 689-4488
Examples of Accessible picnic tables:

Norwood Commercial Furniture

ADA Single-Sided Heavy-Duty Picnic Table

$696.99 - $774.99
See 2 styles

Economizer Plaza Wheelchair Accessible Picnic Table

$839.00

Universal access allowing for wheel chair access at one sitting space. Eco friendly manufactured using 100% recycled plastic. Hidden fasteners on top & seats. This is a picnic table that a wheelchair can easily work with
Mailing Address for:
PO Box 946
Cherokee, IA 51012-0946

End Accessible Twin Pedestal Table - TPT Series
This twin pedestal table is permanent, secure and ADA compliant in a variety of materials
10.) Americans with Disabilities Act-ADA
Self-Evaluation/Transition Plan Survey for the Town of
Hazel Grove Park, aka: The Fairgrounds
Address: Jenkins Road, Groton

To: Michelle Collette, ADA Coordinator
Land Use Director/Town Planner
Town Hall, 173 Main Street
Groton, MA 01450

Present today were:

Caroline Perkins, Groton Planning Board Chairman,
Edward Perkins, Groton Stormwater Committee Chairman,
Alan Taylor, Groton Commission on Accessibility,
Michelle Collette, Town of Groton Planner,
Laurie Smigelski, Hazel Grove Park Association,
and our Consultant, James Lyons, of The NILP

The Hazel Grove Park was surveyed by the team delineated above on September 4, 2015. It is run managed by The Groton Riding, and The Pony Clubs. Two (2) beautiful hiking trails are offered at the Park.

The scope of this report is to identify barriers in programs & activities that might prevent persons with disabilities from access to The Hazel Grove Park 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 Park 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 audit contract includes all of: The Hazel Grove Park including the Groton Fairgrounds Building.

This is a 14 acre Equestrian Park located off Jenkins Road in Groton. Among the Equestrian amenities include: a 1/2 mile Standardbred Training Track, Infield Cross Country Course, two enclosed arenas for groundwork, extensive trail riding network and a parking area on the grassy area.

The Park is home to both the Groton Riding and Driving Club that was founded in 1932 and the Groton Pony Club (founded in 1957). Hazel Grove Park is open to the public from dawn to dusk for all wishing to use the trails and infield. The public is invited to request use of the infield for groups of 5 or more. The Park welcomes monetary donations to help them revitalize Hazel Grove Park.

The trail goes all the way to Fitch’s Bridge, and connects to the Nashua River as well. It provides an excellent walking trail from the Fairgrounds to the Nashua River. The two trails are both in a beautiful, natural setting. The Groton Fairgrounds building is situated on this wonderful site, and it is about 100 years old.

In our opinion the following issues were found:

-Currently there are no designated accessible parking (HP), and no van accessible spaces provided at the park. The parking lot is a grassy area and is unpaved at the present time. It is therefore
recommended that the town add one van spot **Accessible Parking** - **Concurrently**, there are no permanent Designated Accessible (‘HP’) **signs** posted at the site, and there are no ‘Van accessible” spaces found. Therefore, I recommend that two (2) permanent HP (Designated Accessible Parking spaces) with one being a van space, be installed with an in-ground pole or sign that is permanent. I recommend the 4 feet wide van access aisle for the new van accessible space be installed at the spot at the main entrance to the park (in the parking lot area) with an estimated completion date of December/2016.

-Specifically, The ADA requires: One space must be van accessible (as required by the ADA Access Guidelines-The ADAAG), especially, section 4.6.4 requires that accessible parking spaces “shall designate as reserved by a sign showing the symbol of accessibility. Spaces should have an additional sign ‘Van Accessible’ mounted below the symbol of accessibility.”

Signs need to actually be mounted 5 to 8 feet above the ground as per the ADAAG requirements. This is to help prevent mistakes being made when snow/ice, sand, etc. covers the signs painted on the ground. I recommend: The Town install 2 new accessible (HP) parking spaces. Estimated cost each is $1117.00 for one space, prior to March/2016. (The Means ADA Compliance Pricing Guide).

-Today we found that The portable toilet provided at the site is inaccessible. My Recommendation therefore is to request one prior to the spring/2016 season. Specifically, (United Jiffy Johns is the provider at this time.) I recommend contacting them to request they replace the portable toilet with a fully accessible one preferably before March/2016 for next spring season. During the survey today, the ADA consultant was asked whether the Club is required to provide adaptations for youths and adults to mount their horses, and it is my opinion that this is not an ADA requirement, because people bring their own mounting blocks.
Thank you,

James Lyons

Community Advocacy Director
Northeast Independent Living Program, Inc.
20 Ballard Road,
Lawrence, MA 01843
Tel: (978) 687-4288 v/tty
Fax: (978) 689-4488
To: Michelle Collette, ADA Coordinator  
Land Use Director/Town Planner  
And The Groton Commission on Accessibility  
Town Hall, 173 Main Street  
Groton, MA 01450

Subject: *Knowles Siding*  
Pleasant Street  
Groton, MA 01450

August 31, 2015

*Present:*  
Michelle Collette, Groton Town Planner  
Bob Fleisher, Groton Commission on Accessibility (GCA)  
James Lyons, and Sheila Radziewicz, Consultants with The Northeast Independent Living Program, ink (NILP)  
Paul Funch, Trails Committee  
Carolyn Perkins, Planning Board Chairman

James Lyons, and Sheila Radziewicz our Americans with Disabilities Act (ADA) Consultant, completed an ADA self-evaluation on August 31, 2015. Title II of The Americans with Disabilities Act (ADA) applies to all state and local governments, their departments and agencies, and any other instrumentalities or special purpose districts of state or local governments.

The second location that the team assessed on August 31, 2015 is located down the street from Town Hall at Knowles Siding on Pleasant Street. This is a trail connector to the Nashua River Rail Trail in Town Center, i.e., it is a community access point to the trail. This is a highly used trail as it is sometimes felt that it offers a safer option then the town roads for residents.

In our opinion the following accessibility issues were found:

First, we found that the sidewalk that gives access to the trail does not have a curb cut. The ADA Access Guidelines standards for the ramp running slope is a 1:12 maximum. We agreed today that here is indeed a need to create
an accessible access to the trail at this spot. Currently the slope down is not accessible and could be made less than 5% grade.

We discussed the need for a crosswalk for safety purposes; we recommend that the Groton DPW install an accessible crosswalk on the street at this site.

Thank You,

James Lyons, and
Shelia Radziewicz, Consultants

Northeast Independent Living Program, Inc.
The Northeast ADA Access Group
20 Ballard Road,
Lawrence, MA 01843
12.) Americans with Disabilities Act-ADA
Self-Evaluation/Transition Plan for the Town of Groton
Lawrence Playground
Address: Broad meadow Road
Groton, MA 01450

Michelle Collette, ADA Coordinator
Land Use Director/Town Planner
Town Hall, 173 Main Street
Groton, MA 01450
Telephone: 978.448.1105
mcollette@townofgroton.org

Our ADA Consultant, James Lyons completed an accessibility survey on July 16, 2015, and we have conducted an Americans with Disability Act (ADA) Self-evaluation of the Lawrence Playground at the request of the town of Groton. This survey was completed by The Northeast Independent Living Program, Inc. (NILP), who are serving as our ADA consultants. The Town is required, by The ADA, to provide barrier removals for existing facilities. The Town of Groton is exemplary in providing consumer involvement during this process. The Town has contracted with The Northeast Independent Living Program (NILP) that is a consumer controlled, cross disability Independent Living agency, providing advocacy, peer counseling, skills training and information and referral services to persons with disabilities. The Title II requirements for The Lawrence Playground is that it be operated in such a way that, when viewed in its entirety, the services and activities provided are readily accessible to, and useable by people with
disabilities. This is referred to by the ADA as the program accessibility standard, and it is one of the most important concepts in ADA compliance. The Lawrence Playground was constructed circa 2005.

Rationale:
The basis for conducting this (municipal) ADA assessment is that it is the optimal way to create an ambiance or climate of equal opportunities for everyone, regardless of disability, to all the services, programs, and activities the Town has to offer our community. The rationale behind the ADA self-evaluation is to provide recommendations that define areas that do not currently comply with the Federal Americans with Disabilities Act (ADA) Accessibility Guidelines, and The State Architectural Access Board requirements, (521CMR). In other words, the reason for completing this activity in partnership with The NILP is to help all of us make sure that no one here in the Town of Groton gets left out in all municipal services and activities.

We were asked to provide a survey of any physical access issues, and give a list of specific recommendations, which will improve compliance. We were asked to conduct a self-evaluation of the physical accessibility of the Lawrence Playground. The successful coordination and implementation of the Americans with Disabilities Act (ADA) requires a strong commitment from local government leaders to ensure that our programs, services and activities are readily accessible to individuals with disabilities. This commitment involves ensuring that those officials responsible for ADA compliance possess the knowledge, skills and abilities necessary to be successful in their duties. We are working together to seek to achieve the overall goal of the ADA that is- to enable persons with disabilities to lead full lives and fully and equally participate in every aspect of our community.

All public entities subject to Title II of the Americans with Disabilities Act of 1990 (ADA) were required to complete a Self-evaluation by January 26, 1993. If structural modifications were required to achieve program accessibility, all public entities with 50 or more employees were required to do a Transition Plan that set a schedule for removing existing barriers. Both the Self-evaluation and Transition Plans are required to be made available to the public according to 28 C.F.R. §§ 35.105, 35.150(d).

The Town of Groton is a public entity subject to Title II of the ADA. The Town, and their consultants, (The NILP) is completing its Transition Plan for The Playground at this time, and it will need to available to the public. The Groton ADA Coordinator along with The Groton Commission on Accessibility Issues monitors the Town's ongoing efforts toward full compliance with the ADA.

We applaud the Town of Groton, and its’ Groton Commission on Accessibility Issues (GCAI) for initiating these vitally important activities this year. As we discussed during the May Commission meeting, Title II of the ADA requires that public entities with 50 or more employees have the following in place:

1. Designate a responsible employee to ensure ADA compliance
2. Provide notice of ADA requirements
3. Establish a grievance procedure
4. Conduct a self-evaluation
5. Develop a transition plan

**Purpose & Scope:**

*The scope of this document* is to identify any/all barriers in programs & activities that prevent persons with disabilities from access to The Lawrence Playground programs and services. The key to our success is to provide equivalent access to the maximum extent feasible. This report includes an inventory (and details) of the Playground where structural modifications are needed to make facilities accessible to persons with disabilities. Since this is the foundation for the ADA Self-Evaluation, we recommend the Town maintain it on file/available for public inspection for 5 years from date of completion. This audit contract includes all of: The Lawrence Playground.

It is our hope that this Self evaluation will help open a new frontier for transmitting information and sharing resources. Working together, we hope to educate, inform and generate more dedication in the Town about the ADA as it pertains to Local governments, as well as those individuals they serve, throughout the Town. Also, the field has been brought into compliance with the ADA as well as Commonwealth of Massachusetts Architectural Access Boards regulations (521 CMR). We appreciate the hospitality, ADA/disability sensitivity, and dedication of Michelle Collette, Town Planner, Gineane Haberlin, Chairperson, Parks Commission, Matt Frary, Park Commissioner, and Alan Taylor (Commission on Accessibility Issues) who assisted with providing the tour today.

*The playground/park consists of:*

- A beautiful deluxe Gazebo (not accessible at this time),
- A toddler’-play area with play equipment for young children,
- One basketball court, donated land that was most recently renovated in 2005 with a donation “Christine’s Playground.”

We were impressed with much of the ADA compliance at the site. In fact, The Town and The Planning Department, The Groton Accessibility Commission, Parks and Conservation Commissions, et.al, have provided some exemplary ADA improvements at the playground site, and have planned more. In our opinion the following issues violations were found:

**Accessible Parking:**

- At this time, we found that there are no designated accessible (HP) parking spaces provided at the Playground. The park already has an accessible portable toilet. It is my opinion that Kudos is deserving to the town for already providing this accessibility. As we discussed, I recommend that the town add the accessible parking ‘HP’ van space (a descriptive photo of a “Van Accessible” sign is attached) in front of the basketball court. The ADA Access Guidelines
ADAAG, section 4.6.4, signage, requires that accessible parking spaces shall designate as reserved by a sign showing the symbol of accessibility. Spaces shall have an additional sign ‘Van Accessible’ mounted below the symbol of accessibility. One space should be a “Van Accessible” space 8 foot wide with an 8-foot access aisle and van accessible sign. Signs need to actually be mounted 5 to 8 feet above the ground as per the ADAAG requirements. This is to help prevent mistakes being made when snow/ice, sand etc covers the signs painted on the ground. We recommend that both of the signs be raised to a height of 5 feet above the ground, posted on an in-ground permanent pole.

The Town informed me that they plan to add new fresh playground specific wood chips that are made special for play surfaces (this helps reduce injuries on the playground. Already, a stone-dust packed surface is provided in the pathway leading to the Children’s play area. The playground is being used by more people each year, and I fully support The Town’s plan to re-pave the area in the fall, as I was informed that the Town plans to pave the area in front of the portable potty before December, 2015 (by adding an asphalt apron that will indeed make the area accessible, and in compliance with the ADA).

My recommendation, as the Town suggested, is to provide a paved hard packed surface in this immediate vicinity to better enable people to get to the porta toilet.

**The Gazebo:**

The town has recently installed electric utility plugs in the gazebo. I was informed that the town plans to work in partnership with the Town Boy Scout Troop to re-furbish the gazebo, including putting the poles back on, etc. Since this work will be done soon, I recommend the Town install two railings on both sides of the gazebo ramp. I recommend that the Gazebo needs to have a 13 foot ramp installed as per ADAAG section 4.8.1, that states, “The least possible slope shall be used for this new ramp. The maximum slope of a ramp...shall be 1:12.” (The rise to access the Gazebo is 13 inches). Section 4.8.5 of The ADAAG also requires that if a ramp has a rise greater than 6 inches then it shall have handrails on both sides...” Target date for completion would be 3/2016.

Please note that on October 28th, 2015, I was informed that the Gazebo transition Plan objective has been achieved. The Groton Eagle Scouts, have consulted with the Groton Building Commissioner at the onset, and completion of the job in order to ensure accuracy of the ADA work. They have already completely rebuilt the gazebo ramp, including doubling the run (length) from its original four feet to eight feet, and widening it from four to five feet. They totally cleaned out the underside of the gazebo, new PVC skirting was installed to replace the broken wooden lattice, and the beautiful mahogany decking has been stained with a modern wood stain. The Park Commission has also skillfully made plans to make future repairs and updates (i.e., a railing) as they are needed.

(Please see attached photos).

**The Town Field (Basketball Court):**
The Town is planning to install a needed retaining wall to help prevent flooding, as well as ponding of water in the area. (Section 4.8.8 of the ADAAG regulations requires that, “outdoor ramps and their approaches, etc., should be designed so that water will not accumulate on walking surfaces.”) Therefore, I definitely agree that the best plan of action is to: replace the wall that recently formed serious cracks, and to use pre-form blocks for the wall to hold back the water flow during times of flash flooding. In front of this location, I recommend that the town add the accessible parking ‘HP’ van space, as delineated above.

I found that there are presently 4 steps at the basketball court entrance. In order to greatly increase accessibility to the Park, (before 6/2016), The Town is planning to move the chain link fence closer to the road- that will allow increased space for the park. According to our plan, *The telephone poles, fence, are all going to be removed by the Town and the existing wall we found is damaged (and apparently was compromised by the massive snows last winter).*

I support the plan to move the chain link fence closer to the street that will increase access and provide more playing court space for visitors. I am most pleased to be informed that the Community Preservation Commission (CPC) has already approved some funds to repair the basketball court.

Thank You,

James Lyons

Northeast ADA Consultants
Community Development Director
Northeast Independent Living Program, Inc.
The Northeast ADA Access Group
20 Ballard Road,
Lawrence, MA 01843
BEFORE ADA Transition Plan Accomplishments

The Lawrence Playground Gazebo- BEFORE the ADA Transition Plan objectives being accomplished. This photo was taken on July 16, 2015 by James Lyons.
AFTER  ADA Transition Plan Accomplishment
The Lawrence Playground Gazebo- after the ADA Transition Plan work being accomplished.
(This photo was taken by James Lyons on October 28, 2015).
The Groton Boy Scouts, in partnership with the Town of Groton Park Commission have completely rebuilt the gazebo ramp, including doubling the run (length) from its original four feet to eight feet, widening it from four to five feet, and bringing the site into ADA compliance.
13.) Americans with Disabilities Act-ADA
Self-Evaluation/Site Access Survey for the Town of Groton
Legion Common
Hollis and School Streets
Groton, MA 01450

To: Michelle Collette, ADA Coordinator
Land Use Director/Town Planner
Town Hall, 173 Main Street
Groton, MA 01450

James Lyons, our Americans with Disabilities Act (ADA) Consultant, completed an **ADA self-evaluation on August 10, 2015**. The ADA requirement for The Legion Hall (and Legion Common) is that it be operated in such a way that, when viewed in its entirety, the site is readily accessible to and useable by people with disabilities. The ADA refers to this as the program accessibility standard, and it is one of the most important concepts in ADA compliance. Also, the Common is now being brought into compliance with the ADA as well as Commonwealth of Massachusetts Architectural Access Boards regulations (521 CMR). Title II of The ADA prohibits discrimination against qualified individuals with disabilities in all programs, services, and activities of public entities. It applies to all state and local
governments, their departments and agencies, and any other
instrumentalities or special purpose districts of state or local governments.

We appreciate the hospitality, ADA/disability sensitivity, and dedication of
Michelle Collette, Town Planner, and Alan Taylor (Commission on
Accessibility) who assisted with providing the tour today.

The popular GrotonFest event is held at this beautiful site annually in the fall
(on the third Saturday of September). Additionally, there are many
town/other important meetings held here regularly. For example, Finance
Committee, Planning Board, Town Democratic Committee, and other groups
meet here. It is important to note that the one building and the field are
registered historic places in the state of Massachusetts.

The Legion Hall was first constructed in the late 1920’s, and the site is
owned by the state of Massachusetts, and it is maintained and managed by
the town.

We were impressed with much of the ADA compliance at the site. In fact,
The Town DPW, and the Park Commission, plans to provide some ADA
improvements at the Common. The town provides a skating rink each winter
on the beautiful Legion Common. During the GrotonFest, as well as all
events held at this site, there are always accessible portable toilets are
provided.

In my opinion the following issues were found:

I found that there is no directional sign (at the inaccessible entrance) showing
the direction to the accessible entrance. The ADAAG, Section 4.1.2 (7) (c)
requires- that inaccessible entrances need to have directional signage to
indicate the route to the nearest accessible entrance. With a suggested
target date of December/2015.

- I found that there is a 1 1/2 inch lip at the accessible HP parking space.
  I recommend it be bevelled in order to provide a flat walkway, and eliminate
  a possible tripping hazard. With a suggested target date of August/2016.

- Inside the accessible entrance, we found a floor mat that has become worn
  (due to normal wear and tear), and has become a tripping hazard, in my
  opinion. I recommend the Town replace the mat as per ADAAG section 4.5.3
  that states that “exposed edges of a carpet shall be fastened to floor
  surfaces...” I recommend the Legion Hall replace or securely fasten the mat
  at the accessible entrance prior to February/2016.
Next, I found that there are several items being stored at the hallway inside the accessible door. I recommend that the items that are stored at the accessible entrance way be removed. In other words, the ADA Transition Plan action step is to remove the storage at the accessible entrance in order to allow a safe three-foot clear path of travel for patrons with disabilities. With a suggested target date of December/2015.

Signs need to be posted on the pull side of the door as per The ADAAG section 4.30.6, "mounting locations and height, "Where permanent identification is provided...signs shall be installed on the wall adjacent to the latch side of the door."

- **Accessible Parking**—There are presently no Designated Accessible ('HP') van signs already posted at the site. There are no "Van accessible" spaces found. The ADA Access Guidelines (ADAAG) require-One space should be a “Van Accessible” space 8 foot wide with an 8-foot access aisle and van accessible sign. I was informed that the town plans to re-pave the HP space remove the lip there, and install A van accessible sign, as per the ADAAG requirement described below. Accordingly, The town will stripe the accessible space, with a suggested target completion date of July/2016.

The ADAAG, section 4.6.4, signage, requires that accessible parking spaces be designated as reserved by an above-ground sign showing the symbol of accessibility. Spaces shall have an additional sign ‘Van Accessible’ mounted below the symbol of accessibility. We recommend the town install one van accessible HP parking sign. I have attached a photo of the recommended parking spot. The best spot in my opinion, for the van space is next at the accessible entrance is just around the corner on the right hand side of the historical building. The cost estimate for the signs is approximately $340.00 each including all labor, etc., and our suggested target completion date is December/2015.

The HP sign is already mounted on its own pole. I found that the sign is mounted 5 to 8 feet above the ground as per the ADAAG requirements. This is to help prevent mistakes being made when snow/ice, sand etc. covers the signs painted on the ground. We recommend that town continue to provide the sign be permanently installed at the height of 5 feet above the ground.

In my opinion there is inadequate lighting provided at the parking area, and I suggest that two additional exterior lamps be added at the entrance to make the walkway area brighter and safer for everyone. I feel that Kudos is appropriate to the Town of Groton for the creative ADA compliance process used by the Town at this site, in terms of the ADA compliance initiatives, the Town is exemplary.
In this scenario, I fully concur with the Town’s access improvement plan. I agree with this plan that The Town has adroitly described to me today. In my opinion, this is indeed the optimal way to achieve maximum ADA compliance at this beautiful site.

I was informed that The Town has also In summary, I recommend a total of three signs be installed at this site to complete our ADA Transition Plan:
1. The Van accessible sign
2. A Directional sign indication how to find the accessible entrance
3. An Accessible restroom sign on the pull side of the door, (mounted at a height of 60 inches to the centerline of the sign). This Transition Plan, in my opinion, will provide ADA compliance for the Town at this site.

Thank You,

James Lyons
Community Development Director
Northeast Independent Living Program, Inc.
The Northeast ADA Access Group
20 Ballard Road,
Lawrence, MA 01843,
James Lyons, Northeast ADA Consultants

Attachments:
- Legion Hall photos
The Legion Common ADA transition Plan action step is to add a van accessible sign under the HP parking sign already there. Specifically, the Van sign under the ADAAG section 4.6.4, requires that accessible parking spaces be "designated as reserved by an above-ground sign showing the symbol of accessibility. Spaces shall have an additional sign 'Van Accessible' mounted below the symbol of accessibility". In this way, we recommend the town install one van accessible HP parking spot.
The Groton ADA Transition Plan action item is to post a sign at the above locale, indicating where the accessible entrance can be found.
14.) Americans with Disabilities Act-ADA
Self-Evaluation/Site Access Survey for the Town of Groton

Lost Lake Boat Launch
Pine Trail
Groton, MA 01450

Michelle Collette, ADA Coordinator
Land Use Director/Town Planner
Town Hall, 173 Main Street
Groton, MA 01450

James Lyons, our Americans with Disabilities Act (ADA) Consultant, completed an **ADA self-evaluation on August 10, 2015**. The ADA requirement for The Lost Lake Boat Launch is that it be operated in such a way that, when viewed in its entirety, the park is readily accessible to and useable by people with disabilities. The ADA refers to this as the program accessibility standard, and it is one of the most important concepts in ADA compliance. Title II of The Americans with Disabilities Act (ADA) applies to all state and local governments, their departments and agencies, and any other instrumentalities or special purpose districts of state or local governments. The goal of this self evaluation is to plan how to make an existing facility accessible and more useable to people with disabilities. The US Department of Justice recommends the development of an ADA Transition implementation plan specifying the steps what improvements we will make to remove barriers and when each solution will be carried out. The plan below is in fact evidence of good faith effort to fully comply with The ADA. Please keep in mind that full compliance is required with the ADAAG standards only for new construction and alterations. The recommendations are offered as a guide to help the town determine what goals are readily achievable for barrier removals in existing facilities in my opinion.

We appreciate the hospitality of *Michelle Collette, Town Planner, and Takashi Tada Conservation Commission* who provided the tour today.

The Lost Lake Boat Launch is owned by the state of Massachusetts. The **site consists of one boat launch with a bulletin board with posted announcements**. We were impressed with much of the ADA compliance at the site. In fact, The Town and The Park Commission, Planning Board, Conservation Commission, Accessibility Commission, Parks Department, and Conservation Commission have provided some ADA improvements at the playground and field. In our opinion the following issues were found:
**Accessible Parking** - There are presently no Designated Accessible ('HP') signs already posted at the site, and there are no ‘Van accessible” spaces found. The ADA Access Guidelines (ADAAG) require-One space should be a “Van Accessible” space 8 foot wide with an 8-foot access aisle and van accessible sign.

ADAAG section 4.6.4, signage, requires that accessible parking spaces be designated as reserved by an above-ground sign showing the symbol of accessibility. Spaces shall have an additional sign ‘Van Accessible’ mounted below the symbol of accessibility. We recommend the town install one van accessible HP parking spot. I have attached a photo of the recommended parking spot that will be corner van space. The best spot in my opinion, is next to the parking for boat access sign. The cost estimate for the signs is approximately $1117.00 (including all materials and labor needs), with a suggested target completion date of December/2015.

The town informed me that they plan to install the sign accordingly, on its own permanent in-ground pole. Signs need to actually be mounted 5 to 8 feet above the ground as per the ADAAG requirements. This is to help prevent mistakes being made when snow/ ice, sand etc. covers the signs painted on the ground. For these reasons, we recommend for the ADA transition plan, the signs be permanently installed at a height of 5 feet above the ground.

In this scenario, I fully concur with the Town’s access improvement plan. I agree with this plan that The Town has adroitly described to me today. In my opinion, this is indeed the optimal way to achieve maximum ADA compliance at this boat launch.

In my opinion, The Town is most deserving of kudos for their thoughtful ideas, and effective planning to achieve ADA compliance at the beautiful field. I was informed that The Town has also acquired grants funds to install a new modern ADA accessible swing, and an accessible climbing area in the play area. Thank You,

James Lyons  
Community Development Director  
Northeast Independent Living Program, Inc.  
The Northeast ADA Access Group  
20 Ballard Road,  
Lawrence, MA 01843,
The plan is to install one accessible parking space with the sign accordingly, on its own permanent in-ground pole.
Number 15) Nashua River Trail
Americans with Disabilities Act-ADA
Self-Evaluation/Transition Plan for the Town of Groton

Nashua River Trail
Ayer to Dunstable
Groton, MA 01450

To: Michelle Collette, ADA Coordinator
Land Use Director/Town Planner
Groton Commission on Accessibility
Town Hall, 173 Main Street
Groton, MA 01450

Subject: Nashua River Trail
Groton, MA 01450

August 31, 2015

Present:
Michelle Collette, Groton Town Planner
Bob Fleisher, (Groton Commission on Accessibility)
David Pitkin, Greenway Committee,
Takashi Tada, Groton Town Conservation Commission Administrator,
James Lyons, and Sheila Radziewicz, Consultants with the Northeast
Independent Living Program, Inc (NILP)
Paul Funch Trails Committee
Carolyn Perkins, Planning Board Chairman,

James Lyons, and Sheila Radziewicz our Americans with Disabilities Act (ADA) Consultants, completed an ADA self-evaluation on August 31, 2015. Title II of The Americans with Disabilities Act (ADA) applies to all state and local governments, their departments and agencies, and any other instrumentalities or special purpose districts of state or local governments. The goal of this self evaluation is to plan how to make an existing facility more accessible and more useable to people with disabilities. The goal of the day was to evaluate three existing outside spaces and one planned project for the accessibility for people with disabilities.

The US Department of Justice recommends the development of this type of ADA Transition implementation plan specifying the steps what improvements we will make to remove barriers and when each solution will be carried out. The plan below is in fact evidence of the superlative good faith initiative to
fully comply with The ADA. Please keep in mind that full compliance is required with the ADAAG standards only for new construction and alterations. The recommendations are offered as a guide to help the town determine what goals are readily achievable for barrier removals in existing facilities in our opinion.

The Nashua River Trail was originally constructed circa 1950’s, with a re-pavement job being completed about 13 years ago (2002). The wonderful opportunities that the site offers include: hiking, exploring, fishing, training bird watching, and there is heavy equestrian use of the site. The Groton Department of Public Works (DPW) is responsible for maintenance at Nashua River Trail within the town itself. Additionally, each of the participating towns along the path are responsible for maintaining its own section of the trail. Altogether, this trail is a total of 11 miles long, as it runs from Ayer to the Dunstable New Hampshire border line. The NILP consulting provides guidance for the Town at their request, in order to maximize the accessibility of their outdoor recreation areas while protecting the unique characteristics of their natural setting.

In our opinion the following accessibility issues were found:

-We found that the Town’s policy at this site is to allow ADA service animals only on the trail. As we discussed today, the first recommendation therefore is to install a sign clarifying that dogs are not allowed-But ADA service animals, specifically for people with disabilities are allowed.

-There are no accessible parking spaces provided at this time at the site. Therefore, our recommendation is to install one van accessible parking (HP) space. Accordingly, The ADA Access Guidelines (ADAAG) require-one space should be a “Van Accessible” space that is 8 foot wide with an 8-foot access aisle and van accessible sign. For the ADA Transition Plan, we recommend a van accessible sign be posted. We discussed the fine suggestion that the accessible parking spot could be angled so that the vehicles could face in toward the trail.

Specifically, the ADAAG, section 4.6.4, signage, requires that accessible parking spaces shall be designated as reserved by a sign showing the symbol of accessibility. Spaces shall have an additional sign stating, ‘Van Accessible’ mounted below the symbol of accessibility. Signs need to be mounted 5 to 8 feet above the ground as per the ADAAG requirements“. This is to help prevent mistakes being made when snow/ ice, sand etc covers the signs painted on the ground we recommend that the van sign be installed at a height of five-eight feet. The cost estimate for installing the space is approximately $1117.00 with a suggested target completion date of December/2015. Please see the four attached Nashua River Trail photos for the specific area.
We found that there are yellow bollards that have been installed in the middle of the entrances, and we measured them, and found they in fact do provide wheelchair accessibility and adequate clearance. Specifically, we measured the entrances and found: there is 46 inches clearance on the left side of the bollard, and 48 inches clear space on the right side of the Bollard.

**Recommendation**: Therefore, we recommend regular landscaping at the access point as there is a great amount of grass which could cause problems for individuals using a wheelchair.

- We were informed that the plan is to repave the rail trail in the near future we recommend the town paves the area immediately in front of the kiosk so that patrons with disabilities will be able to readily access to information on the sign, etc.

- We recommend that the town move the doggie bags which are referred mutt mitts on the sign to a height of 38 inches instead of the current 50 inches high. We also suggest moving the trash barrel to the opposite side of the mutt mitts at the height of 38 inches as well.

- We also discussed the Town’s interest in opening access to the trail for adaptive bicycles. Currently the opening could cause difficulty for people with adaptive bicycles because of the need of an extended turn radius.

The recommendations below are specifically for the Nashua River Rail trail at the end of Station Ave:

- There are no accessible parking spaces provided at the location. Therefore our recommendation is to install one van accessible space. The ADA access guidelines (ADAAG) requires one space should be a “van accessible” space that is 8 foot wide with an 8 foot access aisle with a van accessible sign. The accessible parking signs need to be mounted 5 to 8 feet above the ground. The team recommends the town add the van accessible parking space at the Knowles siding area near the entrance and the Mutt mitt stand.

- We were informed that there is a plan already being developed that is to repave the rail trail in the near future. The consultants are in full agreement, and we recommend the town paves the area immediately in front of the kiosk so that patrons with disabilities will be able to readily access to information provided here. i.e., specifically, we recommend the town pave the area just immediately in front of the Kiosk so that partons
with disabilities will be better able readily able to get into the trail at the Knowle’s siding area.

We recommend that the town move the doggie bags which are referred mutt mitts on the sign to a height of 38 inches instead of the current 50 inches high. We also suggest moving the trash barrel to the opposite side of the mutt mitts at the height of 38 inches as well. As seen in the attached, photo- we recommend the Town move the trash barrel to the side, and lower the Doggie bags (mutt mitts) on the sign. The Mutt Mitts are 50 inches high, they need to be lowered to 38 inches above the ground in my opinion.

- We also discussed opening of the access to the trail for adaptive bicycles. Currently the opening could cause difficulty for people with adaptive bikes because of the need of an extended turn radius.

Thank You,

James Lyons, and
Shelia Radziewicz, Consultants
Northeast Independent Living Program, Inc.
The Northeast ADA Access Group
20 Ballard Road,
Lawrence, MA 01843
Number 15) Nashua River Trail
Americans with Disabilities Act-ADA
Self-Evaluation/Transition Plan for the Town of Groton

Nashua River Trail
Ayer to Dunstable
Groton, MA 01450

To: Michelle Collette, ADA Coordinator
Land Use Director/Town Planner
Groton Commission on Accessibility
Town Hall, 173 Main Street
Groton, MA 01450

Subject: Nashua River Trail
Groton, MA 01450

August 31, 2015

Present:
Michelle Collette, Land Use Director/Town Planner
Bob Fleisher, Commission on Accessibility
Mark Shack, Commission on Accessibility
James Lyons, and Sheila Radziewicz, Consultants with the Northeast Independent Living Program, Inc (NILP)
Paul Funch Trails Committee
Carolyn Perkins, Planning Board Chairman

James Lyons, and Sheila Radziewicz our Americans with Disabilities Act (ADA) Consultants, completed an ADA self-evaluation on August 31, 2015. Title II of The Americans with Disabilities Act (ADA) applies to all state and local governments, their departments and agencies, and any other instrumentalities or special purpose districts of state or local governments. The goal of this self evaluation is to plan how to make an existing facility more accessible and more useable to people with disabilities. The goal of the day was to evaluate three existing outside spaces and one planned project for the accessibility for people with disabilities.

The US Department of Justice recommends the development of this type of ADA Transition implementation plan specifying the steps what improvements we will make to remove barriers and when each solution will be carried out. The plan below is in fact evidence of the superlative good faith initiative to fully comply with The ADA. Please keep in mind that full compliance is
required with the ADAAG standards only for new construction and alterations. The recommendations are offered as a guide to help the town determine what goals are readily achievable for barrier removals in existing facilities in our opinion.

The Nashua River Trail was originally constructed circa 1950’s, with a re-pavement job being completed about 13 years ago (2002). The wonderful opportunities that the site offers include: hiking, exploring, fishing, training bird watching, and there is heavy equestrian use of the site. The Groton Department of Public Works (DPW) is responsible for maintenance at Nashua River Trail within the town itself. Additionally, each of the participating towns along the path are responsible for maintaining its own section of the trail. Altogether, this trail is a total of 11 miles long, as it runs from Ayer to the Dunstable New Hampshire border line. The NILP consulting provides guidance for the Town at their request, in order to maximize the accessibility of their outdoor recreation areas while protecting the unique characteristics of their natural setting.

In our opinion the following accessibility issues were found:

-We found that the Town’s policy at this site is to allow ADA service animals only on the trail. As we discussed today, the first recommendation therefore is to install a sign clarifying that dogs are not allowed-But ADA service animals, specifically for people with disabilities are allowed.

-There are no accessible parking spaces provided at this time at the site. Therefore, our recommendation is to install one van accessible parking (HP) space. Accordingly, The ADA Access Guidelines (ADAAG) require-one space should be a “Van Accessible” space that is 8 foot wide with an 8-foot access aisle and van accessible sign. For the ADA Transition Plan, we recommend a van accessible sign be posted. We discussed the fine suggestion that the accessible parking spot could be angled so that the vehicles could face in toward the trail.

Specifically, the ADAAG, section 4.6.4, signage, requires that accessible parking spaces shall be designated as reserved by a sign showing the symbol of accessibility. Spaces shall have an additional sign stating, ‘Van Accessible’ mounted below the symbol of accessibility. Signs need to be mounted 5 to 8 feet above the ground as per the ADAAG requirements”. This is to help prevent mistakes being made when snow/ ice, sand etc covers the signs painted on the ground we recommend that the van sign be installed at a height of five-eight feet. The cost estimate for installing the space is approximately $1117.00 with a suggested target completion date of December/2015. Please see the four attached Nashua River Trail photos for the specific area.

We found that there are yellow bollards that have been installed in the middle of the entrances, and we measured them, and found they in fact do
provide wheelchair accessibility and adequate clearance. Specifically, we measured the entrances and found: there is 46 inches clearance on the left side of the bollard, and 48 inches clear space on the right side of the Bollard.

- Yellow post (Bollards) Therefore, we found, after careful measurements, there is adequate clearance provided at the entrances for people with disabilities. The access point into the path is 46 inches wide to the left and 48 inches wide on the right side of the yellow post.

- **Recommendation:** Therefore, we recommend regular landscaping at the access point as there is a great amount of grass which could cause problems for individuals using a wheelchair.

- We were informed that the plan is to repave the rail trail in the near future we recommend the town paves the area immediately in front of the kiosk so that patrons with disabilities will be able to readily access to information on the sign, etc.

- We recommend that the town move the doggie bags which are referred mutt mitts on the sign to a height of 38 inches instead of the current 50 inches high. We also suggest moving the trash barrel to the opposite side of the mutt mitts at the height of 38 inches as well.

- We also discussed the Town’s interest in opening access to the trail for adaptive bicycles. Currently the opening could cause difficulty for people with adaptive bicycles because of the need of an extended turn radius.

- The recommendations below are specifically for the Nashua River Rail trail at the end of Station Ave:

- There are no accessible parking spaces provided at the location. Therefore our recommendation is to install one van accessible space. The ADA access guidelines (ADAAG) requires one space should be a “van accessible” space that is 8 foot wide with an 8 foot access aisle with a van accessible sign. The accessible parking signs need to be mounted 5 to 8 feet above the ground. The team recommends the town add the van accessible parking space at the Knowles siding area near the entrance and the Mutt mitt stand.

- We were informed that there is a plan already being developed that is to repave the rail trail in the near future. The consultants are in full agreement, and we recommend the town paves the area immediately in front of the kiosk so that patrons with disabilities will be able to readily access to information provided here. i.e., specifically, we recommend the town pave the area just immediately in front of the Kiosk so that partons with disabilities will be better able readily able to get into the trail at the Knowles siding area.
We recommend that the town move the doggie bags which are referred mutt mitts on the sign to a height of 38 inches instead of the current 50 inches high. We also suggest moving the trash barrel to the opposite side of the mutt mitts at the height of 38 inches as well. As seen in the attached, photo- we recommend the Town move the trash barrell to the side, and lower the Doggie bags (mutt mitts) on the sign. The Mutt Mitts are 50 inches high, they need to be lowered to 38 inches above the ground in my opinion.

- We also discussed opening of the access to the trail for adaptive bicycles. Currently the opening could cause difficulty for people with adaptive bikes because of the need of an extended turn radius.

- Thank You,

James Lyons, and
Sheila Radziewicz, Consultants

Northeast Independent Living Program, Inc.
The Northeast ADA Access Group
20 Ballard Road,
Lawrence, MA 01843
16) Americans with Disabilities Act-ADA
Self-Evaluation/Site Access Survey for the Town of Groton
Petapawaug Canoe Launch Area
Nod Road
Groton, MA 01450
Groton, MA 01450

August 4, 2015

Michelle Collette, ADA Coordinator
Land Use Director/Town Planner
Town Hall, 173 Main Street
Groton, MA 01450

James Lyons, our Americans with Disabilities Act (ADA) Consultant, completed an **ADA self-evaluation on August 3, 2015**. The Petapawaug Canoe Launch Area is owned by the Town of Groton. The ADA requirement for the Petapawaug Canoe Launch Area is that it be operated in such a way that, when viewed in its entirety, the park is readily accessible to and useable by people with disabilities. The ADA refers to this as the program accessibility standard, and it is one of the most important concepts in ADA compliance. Also, the site is being brought into compliance with the ADA as well as Commonwealth of Massachusetts Architectural Access Boards regulations (521 CMR). Title II of The ADA prohibits discrimination against qualified individuals with disabilities in all programs, services, and activities of public entities. It applies to all state and local governments, their departments and agencies, and any other instrumentalities or special purpose districts of state or local governments.

Present:
Michelle Collette, Land Use Director/Town Planner
Bob Fleisher, GCA, drove his car for us
Takashi Tada, Groton Conservation Commission Administrator
James Lyons, NILP
The Petapawaug Canoe launch area is situated on the Nashua River. The canoe launch /picnic area was originally built circa the 1860’s. This site is beautifully situated on the banks of the Nashua River while this canoe launch /picnic area was originally built circa the 1860’s. The Groton RiverFest, as well as several Bass Fishing Tournaments and other events are held and well attended at this site annually. The site is also nicely used for picnicking, bird watching, boating, hiking, exploring, etc. The Groton Conservation Commission manages the site.

The Boating, canoe, and any other pertinent Permits go through the Conservation Commission. A License to use is required from the Massachusetts Office of Boating Access, and they monitor the site. Partnering organizations such as The Nashoba Paddling Company rents canoes to people with disabilities who use the Petapawaug Canoe Launch Area. The ADA Programmatic accessibility is needed at the site as follows:

**Accessible parking to be provided:** There are currently no HP (Designated Accessible Parking) spaces provided at the canoe launch area, with no van accessible signs posted. I recommend that one van accessible HP space be installed. None of the dirt road parking spaces are marked, or striped at this time, and they never have been in the past. **The Town affirmatively plans to install one HP space.** I am in complete agreement with the town, and support the ADA Transition Plan for The Petapawaug Canoe Launch Area. Accordingly, The ADA Access Guidelines (ADAAG) require-one space should be a “Van Accessible” space that is 8 foot wide with an 8-foot access aisle and van accessible sign. For the ADA Transition Plan, I recommend a van accessible sign be posted.

The ADAAG, section 4.6.4, signage, requires that accessible parking spaces shall be designated as reserved by a sign showing the symbol of accessibility. Spaces shall have an additional sign stating, ‘Van Accessible’ mounted below the symbol of accessibility. Signs need to be mounted 5 to 8 feet above the
ground as per the ADAAG requirements. This is to help prevent mistakes being made when snow/ice, sand etc covers the signs painted on the ground we recommend that the van sign be installed at a height of five-eight feet. The cost estimate for the signs is approximately $506.00, with a suggested target completion date of December/2016.

**Accessible Picnic table:** The picnic tables are unique and wonderful. They were hand-carved by a highly skilled local craftsman and made purely of stone, but the existing picnic benches are not wheelchair accessible, in my opinion. We recommend that the Town provide one accessible picnic table.

Thank you,

James Lyons
Community Advocacy Director
Northeast Independent Living Program, Inc.
20 Ballard Road,
Lawrence, MA 01843
Tel: (978) 687-4288 v/tty
Fax: (978) 689-4488
17) Rich State Forest
Nod Road
Groton, MA 01450

To: Michelle Collette, ADA Coordinator
Land Use Director/Town Planner
And The Groton Commission on Accessibility
Town Hall, 173 Main Street
Groton, MA 01450

August 31, 2015

Present:

Michelle Collette, ADA Coordinator, Land Use Director/Town Planner
Bob Fleisher, Commission on Accessibility
James Lyons, and Sheila Radziewicz, Consultants with the Northeast
Independent Living Program, Inc. (NILP)
Paul Funch, Trails Committee,
Carolyn Perkins, Planning Board Chairman

James Lyons, and Sheila Radziewicz our Americans with Disabilities Act
(ADA) Consultant, completed an ADA self-evaluation on August 31, 2015 at
the Rich State Forest.

Title II of The Americans with Disabilities Act (ADA) applies to all state and
local governments, their departments and agencies, and any other
instrumentalities or special purpose districts of state or local governments.
The goal of this self evaluation is to plan how to make an existing facility

Our third location we assessed on August 31, 2015 was Rich State Forest on
Nod Road. This is a popular common area that is used for biking, hiking,
equestrian use, etc.

In our opinion the following accessibility issues were found:

- There are no accessible parking spaces provided at the location. Therefore
  our recommendation is to install one van accessible space. For safety I
  would recommend having the space point towards the fence. The ADA
access guidelines (ADAAG) require one space should be a “van accessible” space that is 8 foot wide with an 8 foot access aisle with a van accessible sign. Find need to be mounted 5 to 8 feet above the ground.

- The plan is to repave the rail trail in the near future we recommend the town pays the area immediately in front of the kiosk so that patrons with disabilities will be able to readily access to information on the sign.

- We also discussed opening of the access to the trail for adaptive bicycles. Currently the opening could cause difficulty for people with adaptive bikes because of the need of an extended turn radius. The smaller opening requires them to access the trail through the open road which would not be the safest option.

We were informed today that volunteer Paul Funch, member of The 7 Hills Committee, as well as The Groton Trails Committee has successfully applied for a Massachusetts Department of Conservation and Recreation (MA DCR) grant for funding to install an accessible entrance, parking lot, and other innovations to the Trail at the Rich State Forest site. The grant is for the express purpose of building a totally new parking lot, an accessible trailhead, to create a new wheelchair accessible trail, etc. The team had been informed by the State that they cannot excavate due to Historical regulations... i.e., The Historical Site can permit no soil (soil) disruption due to any possible presence of artifacts.

Trails Committee received this state grant and has supplemented it with Community Preservation Act (CPA) funds and now they are ready to build a fully accessible trail from Nod Road to the OxBow of Nashua River in J. Harry Rich State Forest.

We were informed today that the Trail needs to be prepared for contractor work that will be done in November and this involves clearing the course of the trail (clearing all bushes/shrubs and cutting all small trees flush with the ground), clearing off all duff (loose material above the soil), and marking the trail with survey flags. The same needs to be done for rest areas and parking area.

A large group of volunteers was needed to make this work short and easy. The Entrance to trail is at southern gate (not gate at intersection of Nod Rd. and Common St.), about half way from Common St. to Rte. 119. Park as far off Nod Rd. as you can, and use only one side of road (whichever one is first used!) to avoid traffic congestion and improve safety.

The grant, as Paul explained to the Team today, includes the excellent ADA plan that includes:

Installing two van accessible parking spaces, Plus three non HP spaces.
The gate see photo will be left there due to MA Historical Society regulations) An accessible, new 10 foot total trail Additionally, the total area is about ¼ mile of new trails. The plan is to install two rest areas with concrete benches The state has the concrete blocks.

We were also informed that The Seven Hills Foundation is donating accessible picnic tables. (However, the plan does not include installing restrooms at this beautiful scenic historical site.)

Thank You,

James Lyons, and
Shelia Radziewicz, Consultants

Northeast Independent Living Program, Inc.
The Northeast ADA Access Group
20 Ballard Road,
Lawrence, MA 01843
18) Americans with Disabilities Act-ADA
Self-Evaluation/Site Access Survey for the Town of Groton
Rider Basketball Court
Lost Lake Drive
Groton, MA 01450

Michelle Collette, ADA Coordinator
Land Use Director/Town Planner
Town Hall, 173 Main Street
Groton, MA 01450

James Lyons, our Americans with Disabilities Act (ADA) Consultant, completed an ADA Transition Plan on September 4, 2015. The ADA requirement for The Rider Basketball Court is that it be operated in such a way that, when viewed in its entirety, the park is readily accessible to and useable by people with disabilities. The ADA refers to this as the program accessibility standard, and it is one of the most important concepts in ADA compliance. Title II of The Americans with Disabilities Act (ADA) applies to all state and local governments, their departments and agencies, and any other instrumentalities or special purpose districts of state or local governments.

The goal of this self evaluation is to plan how to make an existing facility accessible and more useable to people with disabilities. The US Department of Justice recommends the development of an ADA Transition implementation plan specifying the steps what improvements we will make to remove barriers and when each solution will be carried out. The plan
below is in fact evidence of good faith effort to fully comply with The ADA. Please keep in mind that full compliance is required with the ADAAG standards only for new construction and alterations. The recommendations are offered as a guide to help the town determine what goals are readily achievable for barrier removals in existing facilities in my opinion.

We appreciate the hospitality of Michelle Collette, ADA Coordinator and Town Planner, and Alan W. Taylor of the Groton Commission on Accessibility who provided the tour today.

Rider Basketball Court is owned by the Town of Groton, and is managed by the Park Commission in conjunction with the Groton Fire Department. The site consists of one neighborhood basketball court, and a parking lot in back of Groton Fire Station. I understand that the Fire Station meeting room is used by the general public for community meetings. This is an on call fire station. For this reason, I have included an ADA Transition Plan for the portion of the fire station as well for the benefit of people with disabilities. We were impressed with much of the ADA compliance at the site. In fact, The Town has provided some ADA improvements at the court. In my opinion the following issues were found:

**Accessible Parking**—Because the sign had been broken off, there are presently no Designated Accessible (‘HP’) signs already posted at the site, and there are no ‘Van accessible” spaces found. The ADA Access Guidelines (ADAAG) require—One space should be a “Van Accessible” space 8 foot wide with an 8-foot access aisle and van accessible sign.

ADAAG section 4.6.4, signage, requires that accessible parking spaces be designated as reserved by an above-ground sign showing the symbol of accessibility. Spaces shall have an additional sign ‘Van Accessible’ mounted below the symbol of accessibility. We recommend the town install one van accessible HP parking spot. I have attached a photo of the recommended parking spot that will be corner van space. The best spot in my opinion, is next to the parking for boat access sign. The cost estimate for the signs is approximately $1117.00 (including all materials and labor needs), with a suggested target completion date of December/2015.

The town informed me that they plan to install the sign accordingly, on its own permanent in-ground pole. Signs need to actually be mounted 5 to 8 feet above the ground as per the ADAAG requirements. This is to help prevent mistakes being made when snow/ ice, sand etc. covers the signs painted on the ground. For these reasons, we recommend for the ADA transition plan, the signs be permanently installed at a height of 5 feet above the ground.
I notated the sidewalk that provides rear access to the public meetings that are held in the Fire Station itself. In my opinion, there are cracks that have formed on the sidewalk that exceed ¾ inch. I recommend these be patched with fresh concrete with a suggested target date of April/2016.

In this scenario, I fully concur with the Town’s access improvement plan. I agree with this plan that The Town has adroitly described to me today. In my opinion, this is indeed the optimal way to achieve maximum ADA compliance at this site.

I was informed that The Town has also acquired grants funds to install a new modern ADA accessible swing, and an accessible climbing area in the play area. Thank You,

James Lyons
Community Development Director
Northeast Independent Living Program, Inc.
The Northeast ADA Access Group
20 Ballard Road,
Lawrence, MA 01843,
James Lyons, Northeast ADA Consultants

Attachments:
-Rider Basketball Court photo
To: Michelle Collette, ADA Coordinator
Land Use Director/Town Planner
Town Hall, 173 Main Street
Groton, MA 01450

James Lyons, of the Northeast Independent Living Program, inc. completed an ADA self-evaluation on August 10, 2015, and we have completed an Americans with Disability Act (ADA) Self-evaluation and Transition Plan at The Sargisson Beach Recreational and Conservation Area. The ADA requirements for the recreational area is that it be operated in such a way that, when viewed in its entirety, the site is readily accessible to and useable by people with disabilities. The ADA as the program accessibility standard refers this to, and it is one of the most important concepts in ADA compliance. Also, the field has been brought into compliance with the ADA as well as Commonwealth of Massachusetts Architectural Access Boards regulations (521 CMR). We appreciate the hospitality of Michelle Collette, Town Planner, Takashi Tada Conservation Commission Administrator who provided me with the tour today.

The park consists of a swimming beach, lifeguards on duty during summer season, hiking trails, boating, kayaking, fishing areas, picnic areas, etc. The beach is town owned, and I am impressed with much of the ADA compliance at the site. In fact, The Town and The Planning Department, Accessibility Commission, Parks and Conservation Commission have provided some ADA improvements at the recreational site. In our opinion the following ADA issues were found:

**Accessible Porta-Toilets**- A total of four portable toilets are provided at the site (Triangle Portable Services), and my recommendation is to contact the providers and acquire one more fully accessible portable toilet.

**Accessible Parking**-There is one Designated Accessible (HP) parking space already provided at the trailhead entrance. I found one small tree that presents a barrier to providing a van accessible space, and I
recommend it be clear cut down at its base. This will provide the space with an 8 feet parking spot along with the 4 foot access aisle. However, there are no ‘Van accessible” spaces found. The ADA Access Guidelines (ADAAG) require-one space should be a “Van Accessible” space that is 8 foot wide with an 8-foot access aisle and van accessible sign. For the ADA Transition Plan, I recommend a van accessible sign be posted.

The ADAAG section 4.6.4 signage requires that accessible parking spaces shall designated as reserved by a sign showing the symbol of accessibility. Spaces shall have an additional sign stating, ‘Van Accessible‘ mounted below the symbol of accessibility. Signs need to be mounted 5 to 8 feet above the ground as per the ADAAG requirements. This is to help prevent mistakes being made when snow/ice, sand etc covers the signs painted on the ground we recommend that the van sign be installed at a height of five-eight feet. The cost estimate for the signs is approximately $506.00, with a suggested target completion date of May/2016.

**Trail Safety/Compliance:** Concerning the trails and wooded areas, at this time it is generally best to leave the area natural as best can be done, in my opinion. The town informed me that they plan to install the sign accordingly to ensure ADA compliance.

**Hand Railings:** Presently, there are no hand rails provided along the trail that leads to the picnic area. In my opinion it is feasible to add a railing to the trail, on both sides of the walkway. The Town can choose wooden, plastic/vinyl, PVC, aluminum, or metal, etc., if preferred. The ADAAG, section 4.8.5, requires: Handrails shall be provided along both sides of the {trail}, and they should extend at least 12 inches beyond the top and bottom of the trail and parallel to the ground, gripping surfaces shall be oval or round, and continuous, top of the handrail gripping surfaces shall be mounted between 34 inches, and 38 inches above the surface, and should not rotate within their fittings. The ADAAG requires the railings be two-top and bottom rails- bottom rail and a top rail 34 inches high.

Along the trail leading to the Beach and fishing/picnic areas, there are approximately six water bars on the ground surface that have been installed to channel water flow away from the trail prevent flooding and damages. I measured the water bars at 42 inches wide, the width of the trails. They present a barrier due to the 2-3 inch lip on the ground at every water bar.
**Safety at the Water Bars:** My recommendation is to install truncated domes over these water bars to improve accessibility. Using truncated domes the cost estimate for the squares is approximately $78.00 each for 2’ X 3’ yellow sections, with a suggested target completion date of December/2015. I have also included cost estimates for other interesting options, i.e., blue beach pads. I am not able to find these on the state contractor’s lists, however. This could potentially be accomplished by a possible CPA grant, or a Boy Scouts Eagle badge project. Another option is to install beach mats (description and cost estimates attached) on top of the water bars. Acquiring additional beach mats can be used to improve access on the sand, as well in hilly areas provide greater traction for persons with disabilities.

Water would flow under the mats, and this should reduce the present tripping hazards. There are also 4 X 12 textured truncated domes and other sizes available to choose from. Another option to consider is acquiring a beach wheelchair s (description and cost estimates attached)

The Sargisson Beach Recreational Area plan for hiking trails is to install railings for safety along both sides of the trail in the areas that lead to the point. In order to provide maximum protection, the handrails need to be at both 34 inches, and 19 inches from the ground. In this way, the rails can be used by people with disabilities. The cost estimate for the railing is approximately $48.00 per linear foot, (including materials and contractor’s overhead and all labor) with a suggested target completion date of July/2016. This should prevent some accidents, and increase safety for visitors, hikers, and beach goers.

**Accessible Picnic Tables:** Next, we surveyed the scenic picnic area at the top of a hill overlooking the water. In order to achieve ADA accessibility, my recommendation is to acquire one accessible picnic table (see attached descriptions and cost estimates). This can be installed at the area that is called “the Point” with a target completion date of May/2016, and potentially can be done via the CPC grants program.

**Safety Fence:** At the second (upper) picnic area, the terrain is very hilly, with a tremendous slope moving down toward the lake. I recommend installing a safety fence in back of the picnic tables in order to reduce the hazard of the dangerous drop off into the water.
This can be installed at the area that is called “the Point.” I believe the fence will help prevent people from falling down the steep hill.

I have contacted companies that provide these types of products, including, the Railing Dynamics. Railing Dynamics, for example, offers a complete line of ADA compliant handrails; available in both vinyl and aluminum varieties. The Vinyl Hand Rail is an ADA compliant graspable handrail that provides added safety and security to a trail, stairs or ramp.

It features complete metal-to-metal connections for maximum strength, and an aluminum adjustable internal joiner ensures a strong joint every time in any direction, and will accommodate angles up to 90 degrees. There is also an Aluminum Hand Rail line available that is similar to the Vinyl Hand Rail, but offered in a material and color palette. Both Vinyl and Aluminum Hand Rail systems include a complete line of components including ADA compliant aluminum lineal, accessories, and brackets.

I contacted their local dealer, Doyle Lumber in Andover, and am informed the 10 feet handrail packs cost = $62.58, plus the rail brackets are about $10.10. I will attach estimates from other provider companies for us to look at in Groton.

In my opinion, The Town is most deserving of kudos for their innovative actions, and effective planning to achieve ADA compliance at the beautiful town beach.

Thank You,

James Lyons
Community Development Director
Northeast Independent Living Program, Inc.
The Northeast ADA Access Group
20 Ballard Road,
Lawrence, MA 01843
20. Americans with Disabilities Act-ADA
Self-Evaluation/Site Access Survey for the Town of Groton
Surrenden Farm, aka
The General Field Conservation Area
Shirley Road, Groton, MA 01450

To: Michelle Collette, ADA Coordinator
Land Use Director/Town Planner
And The Groton Commission on Accessibility
Town Hall, 173 Main Street
Groton, MA 01450

James Lyons, our Americans with Disabilities Act (ADA) Consultant, completed an ADA self-evaluation/Transition Plan on September 9, 2015. The ADA requirements for the beautiful General Field is that it be operated in such a way that, when viewed in its entirety, the site is readily accessible to and useable by people with disabilities. The ADA refers to this as the program accessibility standard, and it is one of the most important concepts in securing ADA compliance. Also, the field has been brought into compliance with the ADA as well as Commonwealth of Massachusetts Architectural Access Board regulations (521 CMR). Title II of The ADA prohibits discrimination against qualified individuals with disabilities in all programs, services, and activities of public entities. It applies to all state and local governments, their departments and agencies, and any other instrumentalities or special purpose districts of state or local governments.

We appreciate the hospitality of Michelle Collette, David Pitkin, of the Greenway Committee, and Mr. Bob Pine of the Groton Conservation Trust who kindly provided me with the tour today. The General Field is approximately 10-15 years old, and it is managed by the Groton Conservation Trust. The Town of Groton Conservation Commission has a Conservation Restriction. Altogether the site consists of a small un-paved
parking area, and a beautiful field. We were impressed with much of the ADA compliance at the site already.

It is nicely located on a 1,500-acre block of contiguous protected open space, 360-acre conservation area. Surrenden Farm is paramount in Groton's highest conservation priority. With 3/4 mile of Nashua River frontage, forest and scenic rolling hayfields, Surrenden Farm is one of the largest remaining unprotected landscapes in town. In 2006, The Trust for Public Lands (TPL) worked with the Groton School, the Town of Groton and the Groton Conservation Trust to gather the funds required to acquire the property.

The General Field is used for hiking, meditation, quiet beautiful walks, picnicing, with a big-sky vista.

In my opinion the following remaining issues were found:

The Trust informed me that they had regraded the field last spring, and it turned to meadow, so they will re-seed the area. Their plan is to install a stone dust pathway with the grass mowed for improved access. Therefore, the plan is to replenish/add to the stone dust to improve the hard-packed walkway surface. This will also result in not only improved accessibility, but also safety. In other words, the transition plan includes providing landscaping updates, cutting back the vegetation on the walkways in order to provide a better 3 feet path of travel for patrons with disabilities.

I have determined that there are no accessible parking spaces at the site. Accordingly, the plan described to me additionally includes installing a van accessible parking space. (It is my opinion that all of the grades at the walkways are under 5%) The Trust also plans to cut out new paths.

It is noted that there are no toilets planned to be provided at the General Field. The Trust and The town plan to trim the trees to provide a great view if a wonderful scenic “big sky” vista. This is a view of a nice picturesque mountain locale.

The plan is to construct a Kiosk that will provide information about the site for visitors, including a trail map, as well as the Conservation Commission priorities with an address to call 911, etc. It is also noted that today we discussed leash law signs, the Town plans to trim the trees to give an even better scenic view that in my opinion is an optimal action plan for everyone. We estimate that these Transition Plan steps will be completed prior to the month of June/2016.
**Accessible Parking**- As referenced briefly above, there are currently no permanent Designated Accessible (‘HP’) signs posted at the site, and there are no ‘Van accessible” spaces found. As a result, I recommend that one (1) permanent HP (Designated Accessible Parking) space, that being a van space be installed with an in-ground pole and sign. I recommend the 4 feet van access aisle for the new van accessible space be designated at the spot at the beginning of the trail -with an estimated completion date of March/2016.

Accordingly, one space must be van accessible as required by the **ADA Access Guidelines (The ADAAG)**, specifically, **section 4.6.4 requires that accessible parking spaces “shall designate as reserved by a sign showing the symbol of accessibility. Spaces should have an additional sign ‘Van Accessible’ mounted below the symbol of accessibility.”** (Signs need to be mounted 5 to 8 feet above the ground as per the ADAAG requirements. This is to help prevent mistakes being made when snow/ice, sand, etc. covers the signs painted on the ground. I recommend: The Town install 1 new accessible (HP) parking spaces. The estimated cost is $290.00 for each space, prior to December/2016.

Also in order to provide maximum safety, and accessibility for all, I recommend the team trim the brush, and generally landscape to clean up the trail. I am compelled to highly commend the Trust, as well as the Town of Groton, et.al. for your appropriate, and timely planning to achieve ADA compliance at the beautiful field.

Thank You,

James Lyons  
Community Development Director  
Northeast Independent Living Program, Inc.  
The Northeast ADA Access Group  
20 Ballard Road,  
Lawrence, MA 01843,  
James Lyons, Northeast ADA Consultants

Attachments:  
- General Field photos
General Field is used for hiking, meditation, quiet beautiful walks, picnicing, with a **big-sky vista**. The Trust for Public Lands owns the land.
21 Town Forest
90 Town Forest Road
Americans with Disabilities Act-ADA
Self-Evaluation/Site Access Survey for the Town of Groton
Groton, MA 01450

September 4, 2015

To: Michelle Collette, ADA Coordinator
Land Use Director/Town Planner
Groton Commission on Accessibility
Town Hall, 173 Main Street
Groton, MA 01450

Subject: Town Forest
Town Forest Road
Groton, MA 01450

James Lyons, our Americans with Disabilities Act (ADA) Consultant, completed an ADA self-evaluation on September 4, 2015. The ADA requirement for The Town Forest is that it be operated in such a way that, when viewed in its entirety, the park is readily accessible to and useable by people with disabilities. The ADA refers to this as the program accessibility standard, and it is one of the most important concepts in ADA compliance. Also, the park has been brought into compliance with the ADA as well as Commonwealth of Massachusetts Architectural Access Boards regulations (521 CMR). Title II of The ADA prohibits discrimination against qualified individuals with disabilities in all programs, services, and activities of public entities. It applies to all state and local governments, their departments and agencies, and any other instrumentalities or special purpose districts of state or local governments. The goal of this self evaluation is to plan how to make the existing
site accessible and more useable to people with disabilities. The US Department of Justice recommends the development of an ADA Transition implementation plan specifying the steps what improvements we will make to remove barriers and when each solution will be carried out. This plan is, in fact, evidence of good faith effort to fully comply with The ADA. It is noteworthy that over 30% of the land in the Town of Groton, Massachusetts is protected open space most of which is accessible to the public via an extensive trail network. The ADA survey team today included: James Lyons, NILP, Michelle Collette, Groton Land Use Director, Carolyn Perkins, Planning Board Chairman, Ed Perkins, Stormwater Committee chairman, and Alan Taylor, Member of the Groton Commission on Accessibility.

The Groton Town Forest was initially created by vote of the Town Meeting in 1922, and was among the first dozen such town forests in the Commonwealth authorized under state enabling legislation passed in 1910. Town Forest is used for hiking, meditation, jogging, quiet beautiful walks, exploring, bird watching, picnics, etc. Altogether the site consists of a series of beautiful trails with an un-paved parking area. The Town Forest provides protection for the watershed, educational activities, recreation, and wildlife habitat. It is managed by the town of Groton, Department of Public Works (DPW), and Parks Departments. Altogether, there are approximately 14 miles of trails in the forest, while 6.4 miles of these are marked trails that form a marked loop that stays close to the outer boundaries of the forest. There are numerous side trails that branch off the main trail. The side trails all connect back to the marked loop.

In our opinion the following ADA accessibility issues were found:

As described in the Western Mass Athletic Club website, the Town Forest features events such as the Groton Town Forest Trail Races where the courses are well marked, they tour the scenic Town Forest, and includes no road crossings. These trails are a combination of narrow dirt roads and winding single lane trails, with lots of roots, rocks, leaves, uphill, and downhill. The walkways are best described as mostly smooth, sometimes sandy, and sometimes hilly. It is also my observation that the hills are not extremely large (though some are steep) but they offer a distinct hiking and jogging challenge.

The Town Forest Committee of Groton co-manages the forest lands which have been gifted to or purchased by the Town for Town Forest purposes. Proceeds from the selective harvesting of timber remain in a reserve fund used for maintaining a healthy forest as well as a system of trails for fire protection.

At this time, there are no accessible (HP) parking spaces at the Town Forest. Our recommendation is to add one HP parking since there are currently no permanent Designated Accessible (‘HP’) signs posted at the site, and there are no ‘Van accessible’ spaces found.

Therefore, I recommend that one (1) permanent HP (Designated Accessible Parking) specifically, a van space, be installed with a permanent in-ground pole and
I recommend the 4 feet van access aisle for the new van accessible space be installed-with an estimated completion date of March/2016.

As discussed, one space must be van accessible as required by the ADA Access Guidelines (The ADAAG), specifically, section 4.6.4 requires that accessible parking spaces “shall designate as reserved by a sign showing the symbol of accessibility. Spaces should have an additional sign ‘Van Accessible’ mounted below the symbol of accessibility.” (Signs need to actually be mounted 5 to 8 feet above the ground as per the ADAAG requirements. This is to help prevent mistakes being made when snow/ice, sand, etc. covers the signs painted on the ground. I recommend: The Town install 1 new accessible (HP) van parking space. The estimated cost is $290.00 for one space, prior to March/2016.

Since the surface of the path has become overgrown with vegetation, and worn out in some areas, my recommendation is to use a weedwhacker to cut some of the vegetation impinging into the trail to improve and re-invigorate the Town Forest walkway surface. Additionally, we found some areas of the walkway where vegetation has begun to expand into the path of travel and that has made it problematic for a visitor with a disability to access the path. In other words, we recommend providing landscaping updates, and generally cutting back the vegetation on the walkway in order to provide an improved, clearer 3 feet path of travel.

Also in order to provide maximum safety, and accessibility for everyone, I recommend the town trim the brush, and generally fresh wood chips to clean up the entrance area to the trail. Since there are many large roots that have grown into the trail recently, I recommend they be sawed and cut out of the trail where feasible.

Thank You,

James Lyons
Community Development Director
Northeast Independent Living Program, Inc.
The Northeast ADA Access Group
20 Ballard Road,
Lawrence, MA 01843,

Attachment:
-Town Forest photo
I recommend that one (1) permanent HP (Designated Accessible Parking) space, specifically, a van space, be installed with in-ground pole and sign. I recommend the 4 feet van access aisle for the new van accessible space be installed with an estimated completion date of March/2016.
August 21, 2015

To: Michelle Collette, ADA Coordinator
Land Use Director/Town Planner
Groton Commission on Accessibility
Town Hall, 173 Main Street
Groton, MA 01450

Subject: Wheeler Park
Townsend Road
Groton, MA 01450

James Lyons, our Americans with Disabilities Act (ADA) Consultant, completed an **ADA self-evaluation on August 21, 2015**. The ADA requirement for The Wheeler Park is that it be operated in such a way that, when viewed in its entirety, the park is readily accessible to and useable by people with disabilities. The ADA refers to this as the program accessibility standard, and it is one of the most important concepts in ADA compliance. Also, the park has been brought into compliance with the ADA as well as Commonwealth of Massachusetts Architectural Access Boards regulations (521 CMR). Title II of The ADA prohibits discrimination against qualified individuals with disabilities in all programs, services, and activities of public entities. It applies to all state and local governments, their departments and agencies, and any other instrumentalities or special purpose districts of state or local governments. The goal of this self evaluation is to plan how to make an existing facility accessible and more useable to people with disabilities. The US Department of Justice recommends the development of an ADA Transition implementation plan specifying the steps what improvements we will make to remove barriers and when each solution will be carried out. This plan is in fact evidence of good faith effort to fully comply with The ADA.

The ADA survey team today included: James Lyons, NILP, Michelle Collette, Groton Land Use Director, and Alan Taylor, Member of the Groton Commission on Accessibility.

Wheeler Park is approximately 10-15 years old, and it, is used for skating, ice fishing, meditation quiet beautiful walks, picnics, etc. Altogether the **site consists of a small, un-paved parking area, a beautiful shore front walkway, with opportunities for fishing, picnicking, etc., and beautiful park memorials with a flagpole**. We were impressed with much of the ADA compliance at the site already. Wheeler Park is
managed by the town of Groton Parks Department. In our opinion the following ADA issues were found:

We found a ¾ inch lip at the entrance to the walking path at Wheeler Park. The recommendation is to work with the DPW, or volunteers to bevel the lip to provide a smooth, accessible entrance for all visitors to the park.

Since there are no accessible picnic benches provided currently at the park, the team is recommending acquiring an accessible picnic table to be located next to the flag pole. The team is also recommending purchasing a new accessible bench for the park.

At this time, there are no accessible (HP) parking spaces at the park. Our Recommendation is to add one HP parking since there are currently no permanent Designated Accessible (‘HP’) signs posted at the site, and there are no ‘Van accessible” spaces found. I recommend that two (2) permanent HP (Designated Accessible Parking) spaces, one of them being a van space be installed with in-ground poles or signs. I recommend the 4 feet van access aisle for the new van accessible space be installed-with an estimated completion date of December/2016.

As discussed, one space must be van accessible as required by the ADA Access Guidelines (The ADAAG), specifically, section 4.6.4 requires that accessible parking spaces “shall designate as reserved by a sign showing the symbol of accessibility. Spaces should have an additional sign ‘Van Accessible’ mounted below the symbol of accessibility.” (Signs need to actually be mounted 5 to 8 feet above the ground as per the ADAAG requirements. This is to help prevent mistakes being made when snow/ice, sand, etc. covers the signs painted on the ground. I recommend: The Town install 2 new accessible (HP) parking spaces. The estimated cost is $290.00 for each space, prior to December/2016.

Since the surface of the path has become worn out in some areas, my recommendation is to replenish/add to the stone dust to improve and re-invigorate the hard-packed walkway surface. Additionally, we found some areas of the walkway where vegetation has extensively growing into the accessible path of travel that has made it problematic for a visitor in a wheelchair to access the path. The team discussed the innovative recommendation to replace the bricks with poured concrete (since bricks are not fully accessible, nor ADA compliant walkway sidewalk surface in my opinion). In other words, we recommend providing landscaping updates, and generally cutting back the vegetation on the walkway in order to provide a clear 3 feet path of travel.

Also in order to provide maximum safety, and accessibility for everyone, I recommend the town trim the brush, and generally fresh landscaping to clean up the walkway. Since there are many large roots that have grown into the trail recently, I recommend they be sawed and cutout of the trail. The town in my opinion is most deserving of kudos for its vital planning to achieve ADA compliance at the beautiful park.
Thank You,

James Lyons  
Community Development Director  
Northeast Independent Living Program, Inc.  
The Northeast ADA Access Group  
20 Ballard Road,  
Lawrence, MA 01843,  
James Lyons, Northeast ADA Consultants

Attachments:  
-Wheeler Park photos,  
-Resources re: where to acquire accessible parking signs
August 4, 2015

Michelle Collette, ADA Coordinator
Land Use Director/Town Planner
Town Hall, 173 Main Street
Groton, MA 01450

(Draft- for Discussion with the Town)

James Lyons, the Americans with Disabilities Act (ADA) Consultant, completed an ADA self-evaluation on August 3, 2015. The ADA requirement for William’s Barn is that it be operated in such a way that, when viewed in its entirety, the site is readily accessible to and useable by people with disabilities. We appreciate the hospitality of Michelle Collette, Land Use Director/Town Planner, Takashi Tada, Groton Conservation Commission Administrator, Bob Fleisher, Chairman, Groton Commission on Accessibility (GCA) who drove his car-pool today for the surveyors, and joined with us providing the tour today.

The William’s Barn was originally built circa the 1850’s. This is Conservation Commission land, and the abutting woods are under the jurisdiction of the Groton Conservation Commission. The William’s Barn Committee coordinates the activities on the grounds at the site. A renovation was done about 15 years ago, and was funded by The Massachusetts Historical Commission. The Groton Women’s Club is among the chief organizations that uses the site- For example they host a Winterfest event, Farmer’s Markets are held here each Friday during the summer, and many events and activities are offered at the William’s Barn. There are two trailheads at this site, (One is called the Bruce Clements trail, etc.).

The Groton Women’s Club does a very nice job providing temporary Designated Accessible HP parking spaces during their events in order to meet the needs of their participants. The Group removes these signs at the end of each event. We recommend the Town of Groton install permanent HP spaces, so that the need to repeatedly bring in HP signs in and out will no longer be needed. The provision of events would thus be much easier for all, in my opinion.

Altogether the site consists of two trailheads, the William’s barn historic site, one accessible portable toilets, and all the beautiful fields. We were impressed with much of the ADA compliance at the site already. In fact, The Town and The Park Commission, Planning Board, Conservation Commission, Accessibility Commission, Parks Department, and Conservation Commission have provided some appropriate ADA improvements at the site. In our opinion the following remaining issues were found:

**Accessible Parking** - There are currently no permanent Designated Accessible (‘HP’) signs posted at the site, and there are no ‘Van accessible” spaces found. I recommend that four (4)
permanent HP (Designated Accessible Parking) spaces, one of them being a van space be
installed with in-ground poles or signs that also may be posted on the barn itself. I recommend
the 4 feet van access aisle for the new van accessible space be installed at the spot in front of the
barn door -with an estimated completion date of July/2016.

One space must be van accessible as required by the ADA Access Guidelines (The ADAAG),
specifically, section 4.6.4 requires that accessible parking spaces “shall designate as reserved by
a sign showing the symbol of accessibility. Spaces should have an additional sign ‘Van
Accessible’ mounted below the symbol of accessibility.” (Signs need to actually be mounted 5 to
8 feet above the ground as per the ADAAG requirements. This is to help prevent mistakes being
made when snow/ice, sand, etc. covers the signs painted on the ground. I recommend: The Town
install 4 new accessible (HP) parking spaces. Estimated cost is $290.00 for each space, prior to
July/2016.

The ADA Accessibility Guidelines, section 36.405 Alterations: Historic preservation states that:

(a) “Alterations to buildings or facilities that are eligible for listing in the National Register
of Historic Places under the National Historic Preservation Act, 16 U.S.C. 470 et seq., or
are designated as historic under State or local law, shall comply to the maximum extent
feasible with this part.

(b) If it is determined that it is not feasible to provide physical access to an historic
property that is a place of public accommodation in a manner that will not threaten or
destroy the historic significance of the building or the facility, alternative methods of
access shall be provided pursuant to the requirements of subpart C of this part. “

The Barn has an inaccessible loft that I recommend the Town’s policy be that the loft is not used
for events where members of the public are invited.

There is currently one portable-toilet provided, it is not accessible at this time, in my opinion. I
recommend the town contact the provider to request they replace it with an accessible one with a
target completion date of July 30, 2016. The estimated cost is approximately $225.00 monthly
rental. I recommend, as the town affirmatively wishes to do, -that an accessible picnic table be
provided at this site, with an estimated cost of $560.00, before July/2016.

Thank You,

James Lyons

Northeast ADA Consultants
Community Development Director
Northeast Independent Living Program, Inc.
The Northeast ADA Access Group
20 Ballard Road,
Lawrence, MA 01843
24.) Americans with Disabilities Act-ADA 
Self-Evaluation/Site Access Survey for the Town of Groton 
Woitowicz Field 
Forge Village Road 
Groton, MA 01450

To: Michelle Collette, ADA Coordinator 
Land Use Director/Town Planner 
Town Hall, 173 Main Street 
Groton, MA 01450

James Lyons, our Americans with Disabilities Act (ADA) Consultant, completed an ADA self-evaluation on September 9, 2015. The ADA requirement for Woitowicz Field is that it be operated in such a way that, when viewed in its entirety, the park is readily accessible to and useable by
people with disabilities. The ADA refers to this as the program accessibility standard, and it is one of the most important concepts in ADA compliance. Also, the field has been brought into compliance with the ADA as well as Commonwealth of Massachusetts Architectural Access Boards regulations (521 CMR). Title II of The ADA prohibits discrimination against qualified individuals with disabilities in all programs, services, and activities of public entities. It applies to all state and local governments, their departments and agencies, and any other instrumentalities or special purpose districts of state or local governments.

**Rationale:**

The basis for conducting this (municipal) ADA assessment is that it is the optimal way to create an ambiance or climate of equal opportunities for everyone, regardless of disability, to all the services, programs, and activities the Town’s Open Space and Recreational Programs has to offer to the community. The rationale behind the ADA self-evaluation is to provide recommendations that define areas that do not currently comply with the Federal Americans with Disabilities Act (ADA) Accessibility Guidelines, and The State Architectural Access Board requirements, (521CMR). In other words, the reason for completing this activity in harmony with The NILP, is to help all of us make sure that no one here in the Town of Groton Open Space Recreational Plan gets left out in all pertinent matters. We appreciate the hospitality of Michelle Collette, and Alan W. Taylor of The Groton Commission on Accessibility who kindly provided the tour today.

Events and programs provided at the Park include: Active Sports Teams, i.e., lacrosse, soccer games, tennis courts, picnics, etc. Woitowicz Field is managed by Groton Park Commission. The Park was built 10 years ago. Please see the attached photo that shows the beautiful plaque and citation that honors and dedicated the park to a fallen Veteran of the Iraq War.

In our opinion the following issues were found:

- Currently there are no designated accessible parking (HP) spaces provided at the park. It is therefore recommended that the town add one van spot

**Accessible Parking**—There are currently no permanent Designated Accessible (‘HP’) signs posted at the site, and there are no ‘Van accessible” spaces found. I recommend that two (2) permanent HP (Designated Accessible Parking spaces) with one being a van space be installed with in-ground pole or sign that is permanent. I recommend the 4 feet van access aisle for the new van accessible space be installed at the spot at the main entrance to the park (near the storage shed) with an estimated completion date of December/2016.
-One space must be van accessible as required by the ADA Access Guidelines (The ADAAG), specifically, section 4.6.4 requires that accessible parking spaces “shall designate as reserved by a sign showing the symbol of accessibility. Spaces should have an additional sign ‘Van Accessible’ mounted below the symbol of accessibility.” (Signs need to actually be mounted 5 to 8 feet above the ground as per the ADAAG requirements). This is to help prevent mistakes being made when snow/ice, sand, etc. covers the signs painted on the ground. I recommend: The Town install 1 new accessible (HP) parking space. Estimated cost is $1117.00 for one space, prior to December/2016. (The Means ADA Compliance Pricing Guide).

I applaud the Town of Groton’s affirmative and thoughtful planning to achieve ADA compliance at the beautiful field. In my opinion, the dirt area in front of the portable toilet is not consistently a hard packed surface, especially during inclement weather. It is therefore recommended that the town simply request the company providing the toilet move the jiffy john up so that it is on the edge of the parking space. In this way, it will surely be readily accessible to visitors with disabilities.

-The Park includes one small building that actually has a ramp, and is purely a storage shed, for designated employee use only. Therefore, no ADA transition plan action step is recommended for the shed. Thank You,

James Lyons,
Consultant
Northeast Independent Living Program, Inc.
The Northeast ADA Access Group
20 Ballard Road,
Lawrence, MA 01843