



**TOWN OF  
GROTON**  
**Commission on Accessibility**

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Applicant Responses Date: 04.05.2023  
Maugel DeStefano Architects

**MEMORANDUM**

**DATE:** March 22, 2023

**TO:** Zoning Board of Appeals

**FROM:** ADA Coordinator Michelle Collette

**RE:** Groton Farms Comprehensive Permit

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At its meetings on March 15 and March 22, 2023, the Commission on Accessibility reviewed the Groton Farms plans and supporting documents submitted by 500 MG, LLC for a Comprehensive Permit to construct 200 residential rental units on property located at 500 Main Street. The Committee voted unanimously to offer the following comments:

1. The project must comply with the Americans with Disabilities Act (ADA) and the Massachusetts Architectural Access Board Regulations (AAB), 521 CMR. The Building Commissioner is responsible for interpretation and enforcement of the AAB regulations at the local level. Any variances or appeals must be submitted to the Architectural Access Board, in accordance with the Provisions of 521 CMR 4.00.

**Applicant:**

The project will comply with all accessibility requirements per applicable codes. The codes that are applicable for this development are 521 CMR from the state level and ADA from the federal level.

2. The General Project Overview states that 5% of the project or 10 units will be "Handicap Accessible" and that those units will be located in the multifamily buildings. All garden style units are "handicapped adaptable" (see Page 4). Please ask the applicant to explain the procedures needed to "adapt" a unit to be "accessible." What modifications will be necessary to convert such units? Will any of the townhome units be accessible or adaptable?

**Applicant:**

521 CMR addresses scoping for residential apartments in multifamily dwellings. In the multifamily buildings all units must comply with Group 1 units per 521 CMR. These units must provide clear floor space and maneuvering space around fixtures and equipment and all doors along accessible routes must have 32" clear door widths. All

doors and cabinets must be provided with hardware that is easy to operate with one hand and that does not require tight grasping, tight pinching, or twisting of the wrist to operate.

These Group 1 units must also have features that can be further modified without making structural changes to meet functional needs of an occupant with a disability. The following items are a list of procedures that the landlord/owner must provide when a unit becomes fully adapted:

- Water closets: All walls adjacent to and behind water closets are provided with wood blocking located between 32 to 38 inches. This blocking can support future installation of grab bars.
- Bathtubs: All bathtub walls have structural wall reinforcement capable of supporting future installation of grab bars between 6 inches to 48 inches above the tub bottom and extends the full length and width of the tub. If sliding doors are provided, then the track must be capable of being removed and provide a smooth tub rim for transfer. A handheld shower head with a 60" flexible hose and flow regulator will also be provided.
- Showers: All shower walls shall be capable of structurally supporting the future installation of grab bars, seats, etc., from a height of 6 inches to 48 inches above the floor and shall extend the full width and length of the shower stall. If doors are provided, then the door must be capable of swinging 180 degrees or capable of being removed. A handheld shower head with a 60" flexible hose and flow regulator will also be provided.
- Sinks: If a vanity cabinet is provided under a sink, then it must be capable of being removed without structural change to allow knee space depth and width.
- Doors: If the door swings into the clear floor space, the swing must be reversed to allow for proper clearances.

In addition to the required Group 1 units, 5% of those units must be Group 2A units per 521 CMR. The Group 2A units have features similar to Group 1, but in addition, the Group 2 units also have greater floor space requirements to allow wheelchair turning space. The bathing fixtures also require larger space needs than then Group 1 units.

The townhomes are not regulated by 521 and ADA. They fall under the Sect. R320.1 of the IRC, which references Chapter 11 of the IBC for purview. Within sect. 1103.2.3 – Detached Dwellings, which says that the townhomes are not required to follow the accessibility chapter.

Townhomes are defined as "a single-family *dwelling unit* constructed in a group of three or more attached units in which each unit extends from foundation to roof and with a *yard* or public way on not less than two sides."

3. The Project Overview also states that there will be additional "hearing-impaired units." Where will such units be located and are they being counted as part of the required 5% accessible units? Please ask the applicant to describe what provisions will be made for people who are Deaf and Hard of Hearing (Page 4).

Applicant:

Per 521 CMR, 2% of the total multifamily units are required to be “hearing-impaired units.” Here, these units can be counted as part of the required 5% accessible. One accessible 1-bedroom unit and one accessible 2-bedroom unit of two multifamily buildings (totaling 4 units) will be designated to accommodate the hearing-impaired.

At a minimum, a “hearing-impaired unit” must be wired to allow for future connection of auxiliary visual alarms and visual notification devices. This equipment can also be installed prior to tenancy of a hearing-impaired resident. The auxiliary visual alarms are to be connected to the building emergency alarm system and must be visible in all parts of the designated unit. Visual notification devices are provided to alert the resident of telephone calls and the ringing of a doorbell/knocking.

4. Are there any plans to create accessible units for people who are Blind or have Low Vision?

Applicant:

The buildings provide accessibility for those who are blind or have low vision by:

- providing ample clear headroom of 80” minimum, and warning with detectable barriers/tactile warning for cane detection where the headroom is reduced;
  - tactile handles;
  - providing signage in braille;
  - providing signage complying with character height, proportion, finish, and contrast as stated in 521 CMR 41; and
  - providing alarms that produce a sound exceeding the maximum sound level, but not greater than 120dbA, for each space.
5. The Architectural Drawings section describes a proposed club house with a variety of amenities including a private swimming pool and fitness center (Page 14). Will those amenities be accessible for all residents?

Applicant:

The amenity spaces will be accessible per 521 CMR and ADA.

**In addition**

Here is a list of other accessibility features:

- Door actuators will be provided on the multifamily building main entry and clubhouse main entry including the interior door of a vestibule.
- The townhomes will provide “visit-ability” and “aging-in-place” features.
  - Half of the townhomes will have ground floor primary use. There is a bedroom, bathroom, and kitchen on the ground floor.

At least one zero step entry will be provided.