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ADA Self-Evaluation and Transition Plan

For the Town of Gill

June 2018

Prepared by the Franklin Regional Council of Governments



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Part A – Introduction

The Town of Gill hired the Franklin Regional Council of Governments (FRCOG) to conduct a comprehensive evaluation of the Town’s compliance under Title II of the American Disabilities Act (ADA), which prohibits discrimination on the basis of disability. Specifically, Title II requires that:

No qualified individual with a disability shall, on the basis of disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity [35 CFR Part 35.130 (a)].

Title II of the ADA applies to state and local governments, while Title III of the ADA applies to the private sector such as business and non-profit organizations.

In the Spring of 2018, the Town of Gill secured a grant from the Massachusetts Office on Disability and hired the Franklin Regional Council of Governments (FRCOG) to conduct the ADA Self-Evaluation and prepare the ADA Transition Plan. The FRCOG assessed all Town-owned facilities as well as the Town’s programs, services, and activities to determine their accessibility to people with disabilities.

Like many communities in Massachusetts, Gill is faced with a number of aging municipal buildings and facilities that may pose obstacles to residents with disabilities. The cost and work that is required to remove these barriers and bring them into compliance can be overwhelming to smaller communities like Gill with less than 2,000 residents. This ADA Self-Evaluation and accompanying Transition Plan makes this daunting task a bit easier by identifying the issues, prioritizing them, and sorting out the high cost actions from the simpler, less expensive tasks.

Title II of the ADA sets administrative requirements on state and local governments and also requires that all Town’s programs, services, and activities be accessible to people with disabilities. Part B of this document summarizes the findings regarding the administrative requirements and access to programs, activities, and services. Part C discusses the evaluation and findings of the physical facilities owned by the Town of Gill. Part D is the ADA Transition Plan, which catalogs all accessibility issues of the Town facilities that were found during the evaluations and recommends potential solutions. These recommendations have been prioritized, given an estimated timeframe, and assigned relative costs and responsible departments.

Recent Progress

Gill has been proactive in implementing ADA improvements. These include both large and small projects. Below is a summary of some of the projects that the Town has completed to upgrade its facilities:

- Created a Notice of Non-Discrimination;
- Designated an ADA Coordinator;
- Installed an accessible entrance and concrete ramp at Town Hall;
- Installed a 3-stop elevator at Town Hall;
- Installed a lift for the 2nd floor stage in Town Hall; and
- Constructed a ramp for the Riverside Municipal Building.

Methodology

To conduct the ADA Self-Evaluation of the Town's programs, services, and activities, the FRCOG staff distributed checklists designed by the New England ADA Center (a project of the Institute for Human Centered Design) to all Department Heads that assessed three requirements of Title II of the ADA for each Department's programs and services:¹

- Effective Communication practices
- General Nondiscrimination practices
- Website accessibility

The FRCOG also used the latest 2010 ADA Standards for Accessible Design (ADAAG 2010) to evaluate all of the Town's buildings and facilities.

¹ Self-Evaluation Form Checklists from the New England ADA Center, <https://www.adaactionguide.org/resources#faqs>.

Part B – Evaluation of Non-Discriminatory Policies and Practices in Programs, Services, and Activities

Introduction

Title II of the ADA also places administrative requirements on local governments in addition to ensuring the accessibility of the Town’s programs, activities, and services. These administrative requirements include the appointment of a Town ADA Coordinator, the creation of a public notice regarding nondiscrimination policies, and the adoption of a grievance procedure. The FRCOG staff, with the assistance of Gill staff, evaluated the Town’s compliance with these administrative requirements as well as the Town’s policies related to nondiscrimination, effective communication, and website accessibility.

The findings of this evaluation are discussed in this section along with recommendations to ensure compliance with Title II of the ADA.

Analysis

The FRCOG evaluated each of Gill’s Departments and the overall Town governance with regard to accessibility requirements. Checklists from the New England ADA Center were provided to each Department Head to complete that evaluated a Department’s policies related to General Nondiscrimination, Effective Communication, and Website Accessibility.² The findings of these completed checklists are summarized below and recommendations are provided to ensure that people with disabilities are provided the same opportunities as others to participate in programs, services, and activities in the Town of Gill.

1. Designation of Responsible Employer

Title II of the American Disabilities Act requires that a local government designate a responsible employee to coordinate compliance with the ADA and ensure that there is a person at the Town who is knowledgeable with the many requirements of the ADA. The Town of Gill has met this requirement by designating Lynda Hodsdon Mayo, the Town Clerk, as the ADA Coordinator.

² Self-Evaluation Form Checklists from the New England ADA Center, <https://www.adaactionguide.org/resources#faqs>.

2. Complaint Procedures

In addition to designating an ADA Coordinator, a local government is required to provide a complaint procedure that offers ways for people to file complaints alleging discrimination on the basis of disability with regard to employment or in the provision of services, activities, and programs. Gill has not yet created a formal “ADA Complaint Procedure” although there are general instructions in the Town’s Notice of Non-Discrimination.

It is recommended that the Town create a more complete complaint procedure that outlines how a person can contact the ADA Coordinator, a detailed description of the procedure for submitting a complaint, and the reasonable time frames for review and resolution of the complaint that a person filing a complaint may expect.

3. Notice

Title II also requires that a local government provide public notice of the provisions of the ADA to members of the public that may participate in the Town’s program, services, and activities. The Town of Gill has created a Notice of Nondiscrimination and posted it to their website and at Town Hall. The notice states Gill’s obligations under the ADA and includes procedures for persons with a disability to contact the Town should they require an auxiliary aid or services for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of the Town.

4. Effective Communication

Under Title II of the American Disabilities Act, the Town must communicate effectively with people who may have hearing, vision, or speech disabilities. To do so, this may require Gill to provide auxiliary aids and services to meet its responsibility of effective communication. This may include, but is not limited to: providing sign language interpreters, Computer-Assisted-Real-time-Translation (CART), written materials for persons who are deaf or have difficulty hearing, Braille or large print information in digital format for people who are blind or have difficulty seeing.

All Town of Gill Department Heads completed checklists from the New England ADA Center that evaluated each department’s practices and policies regarding their knowledge and ability to provide effective communication for their programs, services, and activities to allow equal participation for persons with disabilities. The completed checklists show that Town staff are very willing to comply with Title II, but may not know exactly how to do so in practice. In particular, most staff members do not know how to go about arranging for different types of auxiliary aids and services to provide for effective communication when needed, or what the

procedure is for determining when the provision of an auxiliary aid or service is an undue financial or administrative burden. Appendix A provides a summary of the answers to the checklist's questions regarding effective communication practices.

To ensure that Town staff comply with Title II, it is recommended that Gill develop and distribute clear processes for employees as to how to arrange for auxiliary aids and services. A written informational handout on Effective Communication Procedures will help staff understand their responsibilities and clarify what to do in the event a person needs assistance with communication.

5. Reasonable Modifications of Policies, Practices, and Procedures

Title II of the ADA also requires that local governments ensure people with disabilities have an equal opportunity to participate in the services, programs, and activities that the Town provides. This may require that the Town of Gill provide "reasonable modifications" to policies and practices to allow equal participation. When applying to Town staff, this requirement may include modifying work schedules; job restructuring; and making facilities used by employees readily accessible to an employee with a disability. When applying to members of the public to be able to participate in a program, service, or activity, this requirement may include allowing service animals in locations where animals are not typically permitted; allowing the use of motorized devices in places where they are not allowed; or providing assistance with application completion.

The results of the completed checklists from the Town's Department Heads show that with respect to the general nondiscrimination requirements of Title II, Gill staff members are very willing to comply and have a good, general understanding of the many responsibilities and requirements that they have as a local government. However, there are topics with which Department staff could be more familiar. For example, some departments did not know that they are supposed to notify and require assurances from contractors to fulfill Title II requirements. Appendix A provides a summary of the answers to the checklist's questions regarding general nondiscrimination practices.

A written and distributed summary of nondiscrimination policies will help staff ensure that all participants have the opportunity for equal participation.

6. Website Accessibility

Title II of the American Disabilities Act requires that local governments ensure that, when viewed in their entirety, the programs, services, and activities offered are equally available to people with disabilities. Websites of a local government are considered to be a "program" and

should be accessible to the standards of the Web Content Accessibility Guidelines 2.0 AA or Section 508 Standards.

To evaluate the Town of Gill's website, a checklist was sent to the Town's webmaster. The completed checklist shows that the webmaster is aware of their responsibilities regarding accessibility. However, the webpage has not yet been tested for compliance with the latest standards and Town staff are not familiar with those standards.

The Town should have the webmaster test the website for compliance with the latest accessibility standards and evaluate what and how much needs to be revised. Once that is completed, Gill should develop a written policy stating that the Town website should be accessible to ensure that existing and future staff members who have website administrative privileges maintain the accessibility of the website. In addition, staff should be provided guidance about the requirements of the Web Content Accessibility Guidelines 2.0 AA. It would also be very helpful to the Town if people with disabilities who use screen reading software and other assistive technology periodically evaluate the website.

Part C – Evaluation of Facilities

Introduction

FRCOG staff evaluated all Town-owned facilities for this ADA Self-Evaluation in May of 2018 according to the 2010 ADA Standards. These include the following facilities:

Facilities owned by the Town of Gill

- Town Hall
- Slate Memorial Library
- Public Safety Complex
- Riverside Municipal Building
- Gill Elementary School
- Elementary School Nature Area
- Riverside Recreational Fields
- Blake Town Forest

Analysis of Building Accessibility

Gill's Town-owned buildings range in levels of accessibility. For this report, the FRCOG has assigned categories of "functional accessibility" to each facility for ease of reference. These categories are:

- **Accessible** – the facility is accessible to a wheeled mobility device user or person with mobility challenges;
- **Mostly Accessible** – A wheeled device user or person with mobility challenges can enter the facility, access the primary function with the facility, and access the bathroom;
- **Moderately Accessible** – A wheeled device user or person with mobility challenges can enter the facility, access the primary function within that facility;
- **Minimally Accessible** – A wheeled device user or person with mobility challenges can enter the facility;
- **Inaccessible** – A physical barrier exists that would prevent a wheeled device user from entering the facility.

The following table places each building into one of these categories:

Accessible	Mostly Accessible	Moderately Accessible	Minimally Accessible	Inaccessible
	Town Hall	Public Safety Complex		Slate Library
	Gill Elementary School	Riverside Municipal Building		

The above assessment rates each building’s accessibility based on the ability of people with disabilities to access the programs, services, and activities that are offered within those buildings. However, it should be noted that many Town buildings have areas within them that are not accessible at all (ex. basements or staff-only storage areas). Making these spaces accessible according to the 2010 ADA Standards may be structurally difficult and/or practically infeasible. Despite these potential obstacles, this accompanying Transition Plan identifies issues within these spaces and recommends ways to improve accessibility in ways that may be feasible – at least for users who do not require wheeled mobility devices – while acknowledging the inaccessibility these spaces pose for some persons with disabilities.

An important caveat to this rating system is that it primarily evaluates the Town facilities from a member of the public’s perspective, not necessarily from the perspective of an employee who must work in these facilities and access non-public spaces on a regular basis. However, all of the deficiencies in the buildings with respect to the 2010 ADA Guidelines have been noted in the ADA Transition Plan that is included in this Report.

Summary of Building Evaluation Findings

1. Town Hall

While this building is mostly accessible, it does have some issues that need to be addressed in order to make it fully accessible. Fortunately, many of these issues are relatively simple and inexpensive, such as installing tactile/Braille signage and moving grab bars in bathrooms. More expensive, yet feasible upgrades include replacing the staff kitchen sink with one that has toe/knee clearance underneath and removing the threshold step into the kitchen.

2. Gill Elementary School

The Gill Elementary School is also rated as mostly accessible in that users can access the primary function of the building and use the bathroom. However, there is a more

extensive list of issues that should be addressed to bring the building into ADA compliance. This includes: installing tactile/Braille signage, ensuring that all classroom doorways have enough clearance to the sides to pull open or push shut, moving bathroom grab bars, and making sure that hallways are free of obstructions. A potentially more difficult issue is access to the cafeteria kitchen and tray slide area. The entrance area to the tray slide is very tight with little turning space and the aisle next to the tray slide is too narrow for someone in a wheeled mobility device.

Another issue with the Gill Elementary School is the accessibility of its playground. It must be reached by paths that are very steep and there are no accessible routes connecting each of the playground components. The path from the building to the playground ranges from 16-20% slope when the maximum allowable slope is 6.25%.

3. Public Safety Complex

The Public Safety Complex includes three departments: the Fire Department, Police Department, and the Highway Department. In addition, the Fire Department functions as the Town's polling center. The entire complex has been rated as moderately accessible. While people with mobility challenges should be able to enter the various departments, they may have difficulty in doing so. Both doors to the Fire Department have either a large step or a high threshold. The Fire Department, however, can open its garage doors if necessary for access for an individual with a wheeled device who is unable to cross the 1 inch high threshold. There is a ramp to the Police Department's main entrance, but it may be difficult for someone in a wheeled mobility device to push open the door due to the small level landing at the top of the ramp. Additionally, there is no railing on the ramp. The entrance door to the Highway Department has a turn knob fixture that cannot be operated with a closed fist.

In addition, the bathrooms in each of the buildings may be difficult or impossible to access for individuals with wheeled devices or mobility challenges. The bathrooms in the Fire Department (also polling center) are only accessed via steps. The route to the bathroom in the Police Department has narrow doorways, which may not be able to accommodate someone in a wheeled mobility device.

4. Riverside Municipal Building

The Riverside Municipal Building contains offices for Gill's Historical Commission and the Riverside Water District. A portion of the building is also leased to a private middle school. The building used to be Gill's former elementary school and still retains many of its historical features. The building is rated as moderately accessible because people can enter the building via a ramp and access its primary functions; however they may have difficulty using the bathroom. The issues with the bathroom are primarily due to the door – it has hinges that narrow its width, it does not have a pull handle on the interior side of the door, and there is no clearance to the side of the door to pull it open.

5. Slate Memorial Library

The Slate Memorial Library is a historic one-room library in Gill Center. It is rated as inaccessible due to the fact that the inner vestibule of the entrance is too difficult and tight to navigate for someone in a wheeled device or with mobility challenges. The vestibule contains multiple doors that must be opened in opposite directions in a tight space. In addition, the only bathroom in the building is located in the basement via a narrow, steep flight of stairs and is only for library staff. Reconfiguration of the vestibule area and doors will be needed to make the building and its Library Program moderately accessible.

Part D – ADA Transition Plan

The ADA Transition Plan for Gill catalogs every issue that the FRCOG staff discovered during the Self-Evaluation of the Town’s buildings and facilities in April-May 2018. The Transition Plan recommends solutions to bring these identified issues into compliance with the 2010 ADA Guidelines and then prioritizes them, provides relative costs, estimates a feasible timeframe of implementation, and assigns the issue to the appropriate implementing department. In addition, the majority of issues have been documented with photographs, which can be found in an accompanying CD-ROM and Appendix B.

The following categories were used for the Transition Plan’s prioritization:

- 1) Priorities: High
Medium
Low

- 2) Timeframe: Short (0-4 years)
Medium (5-9 years)
Long (10+ years)
Ongoing

- 3) Cost: \$\$\$\$ (Major capitol project)
\$\$\$
\$\$
\$ (Maintenance)

Gill ADA Self-Evaluation & Transition Plan

Gill Elementary School (48 Boyle Road)

Location	Room	Element	Type	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Approach and Entrances											
Main entrance		Doorway	Threshold	534	Threshold is too high.	>1/2"	Reduce threshold height or bevel to a maximum of 1/4".	High	Short	\$	GMRSD
Main entrance		Doorway	Intercom	538	The intercom is placed too high on wall.	55.5"	Lower intercom to a maximum of 54" above ground	High	Short	\$	GMRSD
Parking											
Main parking lot		Accessible parking	Signage	536	Sign is too low to the ground	49"	Move sign higher to a minimum of 60" above the ground.	Medium	Short	\$	GMRSD
		Accessible parking	Spaces		With approximately 30 spaces in the parking lots, there should be 2 accessible spaces.	1	Designate an additional accessible space next to existing space. At least 1 of these spaces should be Van Accessible.	High	Short	\$	GMRSD
		Accessible parking	Spaces	537	Current accessible space has an access aisle that is too narrow.	4'	Expand width of access aisle to 5'. Note: could place 5' wide access aisle between this and new space to left which they could share.	High	Short	\$	GMRSD
Bicycle Racks		Accessible Route			Bike racks are not located on an accessible route .		Ensure bike racks are connected to an accessible route via a smooth, stable route.	Low	Short	\$	GMRSD
Playground											
Playground		Accessible Route			There is not accessible route to playground or any of the structures. Current ramp to the playground has slopes of 16-20%.		Provide an accessible route to the entrance of the play area and to each ground level component.	Medium	Medium	\$\$\$	GMRSD/Town
Access to Goods and Services											
Entire building		Signage			There is no signage with tactile characters or Braille on any rooms.		Install signage on the latch side of doors that can be read using touch and with contrasting colors. Ensure a clear space within 3 inches of signage.	High	Short	\$\$	GMRSD
Entire building		Emergency exits	Thresholds	602	The majority of the exterior emergency exit doors have high thresholds of several inches.		Redesign thresholds so that they do not exceed 1/4" in height.	Medium	Short	\$\$	GMRSD
All Classrooms		Sinks		578	The majority of classroom sinks do not have toe or knee clearance positioned for a forward approach.		Provide a sink with toe and knee clearance for a forward approach.	Medium	Medium	\$\$	GMRSD
		Accessible Route		582	Most classrooms do not have 18" of clearance to side of latch on pull side of door or 12" of clearance to side of latch on push side of door due to furniture.		Relocate furniture to create appropriate clearances.	High	Short	\$	GMRSD

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Location	Room	Element	Type	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Main entrance lobby		Accessible Route		541	There is not clear space under fire pulls.		Maintain a clear area of 30" x 48" under all switches and fire pulls.	High	Short	\$	GMRSD
Cafeteria	Kitchen	Accessible Route	Entrance	545	Doorway entrance area is too tight for maneuvering.		Should have a 30" x 48" clearance past doorway.	Medium	Medium	\$\$\$	GMRSD
	Kitchen	Accessible Route	Hallway	546	Aisle space with tray slide is too narrow.	24"	If possible, move tray slide back to create an aisle of a minimum of 36" wide.	Medium	Medium	\$\$\$	GMRSD/Town
Multi-Purpose Room	Main entrance	Door		555	Doorway width is too narrow due to central door jamb.	29.5"	Replace doors that have a minimum clearance width of 32".	High	Medium	\$\$	GMRSD/Town
Hallway		Signage		556	Sign for fire extinguishers are too low (multiple locations in hallway).	76"	Raise height of sign so that bottom is no less than 80" from floor.	Low	Short	\$	GMRSD
Staff Bathroom		Accessible Route	Door	559	Door has a fixture that can't be operated with a closed fist.		Replace door handle with a lever or loop that can be operated with a closed fist.	High	Short	\$	GMRSD
		Toilet Room		560	There are no side or rear grab bars.		Install side and rear grab bars at a height of 33-36" above the floor.	High	Short	\$	GMRSD
		Toilet Room		560	There is exposed piping under the sink.		Cover the piping with insulation to protect against contact.	High	Short	\$	GMRSD
Girl's Main Bathroom		Accessible Route		562	The vestibule area inside bathroom is too small for maneuvering with door that swings in. The route is only 29" wide due to privacy wall.		Ensure appropriate clearance by repositioning privacy wall.	High	Short	\$\$	GMRSD
		Toilet Room		563	There is exposed piping under the sink.		Cover the piping with insulation to protect against contact.	High	Short	\$	GMRSD
		Mirror		565	The mirror is positioned too high.		Lower mirror so that bottom is no higher than 40" from floor.	High	Short	\$	GMRSD
		Grab bars		567	The side and rear grab bars are too high.	37"	Lower grab bars to 33-36" from floor. Note: standards for children grab bar heights are lower ranging from 20"-27" depending on age served.	High	Short	\$	GMRSD
		ADA stall		568	Self-closing hinge is not working.		Repair hinge so that door self-closes.	High	Short	\$	GMRSD
Boy's Main Bathroom		Accessible Route		569	The vestibule area inside bathroom is too small for maneuvering with door that swings in. The route is only 29" wide due to privacy wall.		Ensure appropriate clearance by repositioning privacy wall.	High	Short	\$\$	GMRSD
		Toilet Room		570	There is exposed piping under the sink.		Cover the piping with insulation to protect against contact.	High	Short	\$	GMRSD
		Mirror		570	The mirror is positioned too high.		Lower mirror so that bottom is no higher than 40" from floor.	High	Short	\$	GMRSD
		Entrance to ADA stall			Urinal in front of door to ADA stall prevents a clear pathway into stall.		Reconfigure stall so that door opens differently, possibly on front side.	High	Short	\$\$	GMRSD
		Toilet in ADA stall		572	Flush control is not on the open side.		Reconfigure flush control to be on the open side of the stall.	Medium	Medium	\$\$	GMRSD

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Location	Room	Element	Type	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Nurse's Office		Accessible Route		574	Door does not have 18" of clear space beyond the latch on the pull side of the door due to furniture.		Move furniture to ensure 18" of maneuvering space to side of door.	High	Short	\$	GMRSD
	Toilet Room	Accessible Route		575	Door is too narrow.	24"	Widen doorway to a minimum of 32".	Medium	Medium	\$\$	GMRSD
	Toilet Room	Toilet paper		575	Toilet paper is located across from toilet and is too far to reach.		Relocate toilet paper dispenser to side of toilet no higher than 48" from floor and 7-9" from front of toilet.	Medium	Short	\$	GMRSD
Hallway outside of Nurse's Office		Defibrillator box		577	Defibrillator box is located too high on wall.	68"	Lower defibrillator box to a maximum of 54" from floor.	Medium	Short	\$	GMRSD
Hallway		Shelving		581	Shelving protrudes too far from wall.	9"	Install a barrier at floor of beginning/end of shelves to warn the visually-impaired of protrusion, such as cubbies.	High	Short	\$\$	GMRSD
Hallway		Thermostat		583	Thermostat is located too high on the wall.	60"	Lower thermostat to a maximum of 54" from floor.	Low	Short	\$	GMRSD
Library/Media Room		Accessible Route		591	There is not always a 36" clear pathway of access through room.		Rearrange furniture so that a 36" clear path to books and seating is maintained.	High	Short	\$	GMRSD
Kindergarten	Bathroom	Grab bars		595	There are no side or rear grab bars.	37"	Install grab bars. Note: standards for children grab bar heights are 20"-25" for ages 5-8 yrs old.	Medium	Short	\$	GMRSD
		Door			Doors are heavy and difficult to open.		Adjust closer on doors.	High	Short	\$	GMRSD
First grade	Bathroom	Grab bars		599	There is no rear grab bar in 1 toilet room and no bars in the other.		Install grab bars. Note: standards for children grab bar heights are 20"-25" for ages 5-8 yrs old.	Medium	Short	\$	GMRSD
		Toilet		599	Flush control handle is not on the open side.		Relocate flush control to open side of toilet.	Medium	Medium	\$\$	GMRSD
		Toilet paper		599	Toilet paper is located across from toilet and is too far to reach.		Relocate toilet paper dispenser to side of toilet no higher than 48" from floor and 7-9" from front of toilet.	Medium	Short	\$	GMRSD
		Door			Doors are heavy and difficult to open.		Adjust closer on doors.	High	Short	\$	GMRSD

Gill ADA Self-Evaluation & Transition Plan

Town Hall (325 Main Road)

Location	Floor	Room	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Approach and Entrances											
Main parking lot			Signage	614	Sign for accessible entrance is too low.	44"	Raise height of sign to 60" from ground.	Medium	Short	\$	Highway
Parking											
Accessible parking spaces			Signage	615	Signs for accessible parking is too low.	44"	Raise height of signs to 60" from ground.	Medium	Short	\$	Highway
Accessible parking spaces			Striping	618	Striping for accessible spaces have worn away.		Restripe spaces so that parking areas are clear.	High	Short	\$	Highway
Bicycle parking			Accessible Route	645	Bike racks are not located on an accessible route .		Ensure bike racks are connected to an accessible route via a smooth, stable route.	Medium	Short	\$	Highway
Access to Goods and Services											
Entire building			Signage		Many rooms are missing signage with tactile characters or Braille.		Install signage on the latch side of doors that can be read using touch. Ensure a clear space within 3 inches of signage.	High	Short	\$\$	Highway
Upstairs meeting room	2		Stairway (both)	623	Handrails on stairway should extend 12" onto horizontal surface.		Extend handrails around the outside of the landing and 12" past the top and bottom of the stairs.	Medium	Medium	\$\$	Highway
Men's Bathroom	1		Toilet	628	Flush control is not on the open side of the toilet.		Relocate flush control to open side.	Medium	Medium	\$\$	Highway
			Grab bar	628	Side grab bar is too low.	30"	Raise height of side grab bar to 33-36".	High	Short	\$	Highway
Women's Bathroom	1		Grab bar	632	Side grab bar is too low.	30"	Raise height of side grab bar to 33-36".	High	Short	\$	Highway
Staff Kitchen	1		Sink	630	Sink does not have toe or knee clearance for a forward approach and walls prevent a parallel approach.		Reconfigure cabinetry to allow a forward approach with sufficient toe and knee clearance with depth of 17"-25" and clear space of 27" from floor.	Medium	Medium	\$\$	Highway
			Counter	630	Counter is too high.	36"	Lower counter to a maximum of 34" from floor.	Medium	Medium	\$\$	Highway
			Threshold	631	Threshold to kitchen is too high.	1"	Reduced threshold to no more than 1/4".	High	Short	\$	Highway
Administrator's Office	1		Accessible Route	635	Not enough room on push side of door latch for maneuvering due to wall.	3"	Rehang door so that it opens to the opposite side away from wall.	High	Short	\$	Highway
Stairways	B		Stairway	638	Stairway is steep and too narrow without proper handrails.		Extend handrails around the outside of the landing and 12" past the top and bottom of the stairs.	Medium	Medium	\$\$	Highway
Hallway	B		Accessible Route	640	Furniture and objects in way of clear pathway.		Rearrange furniture and objects to maintain a 36" wide pathway.	High	Short	\$	Highway
Elevator	1		Signage		There is no tactile star on the door jambs identifying the main entry level.		Install a tactile star on both 1st floor door jambs of the elevator.	Medium	Short	\$	Highway

Gill ADA Self-Evaluation & Transition Plan

Public Safety Complex - Fire Station (196 Main Road)

*Used as Town's Polling Station

Location	Room	Element	Type	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Approach and Entrances											
Rear Entrance		Accessible Route	Threshold	955	Rear entrance has a high threshold.	1"	Repair threshold so that there is not a vertical height >1/4".	High	Short	\$	Highway
Parking											
Rear Parking		Accessible Parking			Temporary accessible parking space signs are placed near rear entrance during elections.		Make sure spacing of signs allow for 8ft space with 5ft aisle.	High	Short	\$	Highway
Access to Goods and Services											
Entire Building		Signage			There is no signage with tactile characters or Braille on any rooms.		Install signage on the latch side of doors that can be read using touch. Ensure a clear space within 3 inches of signage.	High	Short	\$	Highway
Kitchen	Kitchen	Fixtures and switches		944	Light switch is too high. Sink does not have toe/knee clearance.	Light = 58"	Lower light switch to no higher than 54". Create toe/knee clearance under sink with depth of 17"-25" and a clear space 27" tall from floor.	Medium	Medium	\$\$	Highway
Hallway to Bathrooms		Accessible Route		956	Route to bathrooms are only accessible by a 8" step.		Explore ways to install ramp or improve access.	High	Medium	\$\$\$	Highway
Bathrooms		Toilet		970	There are no accessible toilet stalls.		Reconfigure stalls so that there is appropriate clearance for maneuvering and install grab bars.	High	Medium	\$\$	Highway

Gill ADA Self-Evaluation & Transition Plan

Public Safety Complex - Highway Garage (196 Main Road)

Location	Room	Element	Type	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Approach and Entrances											
Main Entrance		Door		979	Door hardware is a turn knob that cannot be operated with a closed fist.		Replace door hardware with ones that can be operable with one hand and not require tight grasping, pinching, or twisting of the wrist.	High	Short	\$	Highway
Access to Goods and Services											
Entire Highway Building		Doors			Door hardware is a turn knob that cannot be operated with a closed fist.		Replace door hardware with ones that can be operable with one hand and not require tight grasping, pinching, or twisting of the wrist.	High	Short	\$	Highway
Kitchen	Kitchen	Sink		944	Sink does not have toe/knee clearance.		Create toe/knee clearance under sink with depth of 17"-25" and a clear space 27" tall from floor.	Medium	Medium	\$\$	Highway
Breakroom	Breakroom	Accessible Route	Door	983	Door to break room is too narrow.	28"	Widen doorway to minimum width of 32".	Medium	Medium	\$\$	Highway
Bathrooms		Toilet		975	Flush control is not on the open side.		Reconfigure flush control to be on the open side of the stall.	Medium	Medium	\$\$	Highway
		Sink		975	There is no sink that has sufficient depth underneath.		Replace current sink or install a second sink with appropriate clearance and fixtures that can be operable with one hand and not require tight grasping, pinching, or twisting of the wrist.	Medium	Medium	\$\$	Highway

Gill ADA Self-Evaluation & Transition Plan

Public Safety Complex - Police Station (196 Main Road)

Location	Element	Type	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Approach and Entrances										
Main Entrance	Accessible Route	Ramp	989	Sidewalk has a slope of 9% and has an increase in height of 9.5".		Treat sidewalk as a ramp and add features such as handrails and edge protection.	High	Medium	\$\$	Highway
Parking										
Parking Lot	Accessible Parking		986	There is no space designated as an accessible space.	0	Clearly designate an accessible parking space with pavement markings and sign that is 60" from ground. It must also be marked as Van Accessible.	High	Short	\$	Highway
Access to Goods and Services										
Front Lobby	Service Counter		990	Service counter is too high and does not have toe/knee clearance.	44"	Provide a lower counter that is not higher than 36" with 17"-25" of depth underneath.	High	Medium	\$\$	Highway
Front Lobby	Accessible Route	Protrusion	1008	Air conditioner protrudes too far into pathway.		If possible, move air conditioner higher so that bottom edge is above 80" from floor. Provide remote control to access switches.	Medium	Medium	\$\$	Highway
Conference Room 1	Accessible Route	Doorway	995	Doorway is too narrow into Conference Room 1 and is the pathway to the bathroom.	27"	Widen door width to a minimum of 32".	High	Medium	\$\$	Highway
Bathroom	Sink		999	Sink has exposed piping and mirror is too high.	48"	Lower mirror so that bottom edge is no higher than 40" and cover piping with protective materials to avoid contact.	Medium	Short	\$	Highway
Booking Room	Accessible Route	Doorway	1000	Doorway width is narrowed due to platform for booking counter.		Shorten platform so that it does not extend past door frame.	Medium	Short	\$	Highway
Booking Room	Service Counter		1002	Counter for fingerprints is too high.	44"	Provide a lower counter that is not higher than 36" if possible.	Medium	Medium	\$	Highway

Gill ADA Self-Evaluation & Transition Plan

Slate Memorial Library (360 Main Road)

Location	Floor	Element	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Approach and Entrances										
Main Entrance		Door		Main entrance door has turn knobs for hardware that cannot be operated with a closed fist.		Replace door hardware with ones that can be operable with one hand and not require tight grasping, pinching, or twisting of the wrist.	High	Short	\$	Highway
Main Entrance		Vestibule		Insufficient space to navigate through vestibule and open or close multiple doors.		Remove/reconfigure inner vestibule doors so that a user with a wheelchair can navigate through the space.	High	Medium	\$\$	Highway
Parking										
Parking Lot		Accessible Parking	1010	There is no parking space designated as an accessible space.	0	Clearly designate an accessible parking space with pavement markings and sign that is 60" from ground. It must be marked as Van Accessible.	High	Short	\$	Highway
Bicycle Parking		Accessible Route	1009	Bike racks are not located on an accessible route .		Ensure bike racks are connected to an accessible route via a smooth, stable route.	Medium	Short	\$	Highway
Access to Goods and Services										
Main Room		Accessible Route	1019	Furnace grates on floor have large holes.	1" x 1"	Replace or repair grates so that holes do not exceed 1/2" x 1/2".	High	Short	\$	Highway
Bathroom		Accessible Route	1028	The only bathroom on site is located in the basement with access solely by stairs. It is also not large enough.		Build an accessible bathroom on the first floor.	High	Long	\$\$\$\$	Highway

Gill ADA Self-Evaluation & Transition Plan

Riverside Municipal Building (54 French King Highway)

Location	Floor	Element	Type	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Approach and Entrances											
Main Entrance		Accessible Route	Flooring	1035	Carpet is not securely attached and is uneven.		Install an ADA-compliant walk-off mat.	High	Short	\$	Highway
Parking											
Parking Lot		Accessible Parking	Signage	1033	Signage for accessible parking is too low and does not state that it is Van Accessible.	42"	Raise height of sign to minimum of 60" and add sign to say that it is Van Accessible.	Medium	Short	\$	Highway
Access to Goods and Services											
Bathroom	1	Toilet		1038	Toilet flush control is not on the open side of the toilet.		Move the flush control to the open side.	Medium	Medium	\$\$	Highway
		Sink		1040	Sink has exposed piping and does not have proper clearance underneath.	35" tall and 25" clearance under	Replace sink so that it is no taller than 34", has a clearance of at least 27" underneath with depth of 17"-25". Cover piping and relocate trash can under the sink.	High	Medium	\$\$	Highway
		Paper Towels		1040	Paper towel dispenser is too high over the sink.	56"	Lower dispenser to a height of no more than 48" from floor.	High	Short	\$	Highway
		Door		1041	There is no pull handle on interior of door and lock is too high. There is not enough clearance to side of door to pull open.	53"	Install pull handle on door and move lock to a maximum height of 48". Relocate sink if possible to allow for clearance at side of door of at least 18".	High	Short/ Medium	\$\$	Highway
Main Hallway		Accessible Route	Thresholds	1042	Thresholds are > 1/4" vertical height or have gaps.		Ensure that thresholds have no more than 1/4" vertical height. Install bevels when necessary.	High	Short	\$	Highway
Main Hallway		Accessible Route	Interior Doors	1046	Doors have turn knobs that cannot be operated with a closed fist.		Replace door hardware with ones that can be operable with one hand and not require tight grasping, pinching, or twisting of the wrist.	High	Short	\$	Highway
				1051	Many interior doors have large hinges that narrow doorway width.	31"	Change hinge hardware so that there is a minimum width of 32" in doorways.	High	Short	\$	Highway
Basement Stairs	B	Accessible Route	Stairway	1062	Stairway to basement does not have proper handrails.		Replace handrails that have a top handrail between 34"-38" and are on both sides of stairs.	Medium	Medium	\$\$	Highway

Gill ADA Self-Evaluation & Transition Plan

Riverside Recreational Fields (88 Riverview Drive)

Location	Element	Type	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Approach and Entrances										
Ballfield	Accessible Routes		922	There is no accessible path from Riverview Drive or Riverside Municipal Building parking lot to the ballfield.		Install a smooth, stable surface from entrance to each component.	Medium	Medium	\$\$	Highway
Parking										
Parking Lot at Riverside Municipal Building	Accessible Parking	Signage	1033	Signage for accessible parking is too low.	42"	Raise height of sign to minimum of 60" and add sign to say that it is Van Accessible.	High	Short	\$	Highway
Riverview Drive	Accessible Parking			There is no designated accessible parking on Riverview Drive.	0	Designate a Van Accessible parking space on Riverview Drive near the backstop.	High	Short	\$	Highway

Gill ADA Self-Evaluation & Transition Plan

Blake Town Forest (Hoe Shop Road)

Location	Element	Type	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Approach and Entrances										
Main entrance and trail	Accessible Route		1067	The main entrance and hiking trail is rough, steep, and uneven. May be accessible to those with minor disabilities.		To increase the site's accessibility would require a large impact to the natural state of the area, which would likely compromise the site's environmental value.	--	--	--	No action

Gill ADA Self-Evaluation & Transition Plan

Nature Area behind Gill Elementary School (48 Boyle Road)

Location	Element	Type	Photo	Issues	Current Measure	Recommendations	Priority	Timeframe	Cost	Responsible Dept.
Approach and Entrances										
Nature Area	Accessible Route			The walking trail is uneven and rough surface.		Create a path with a firm, stable surface.	Low	Long	\$\$\$	Highway
Parking										
Parking Lot	Accessible Route			The parking lot is located far from the walking trail and users must cross the ballfields to access the nature area.		Create an accessible path from the parking area to the nature area.	Low	Long	\$\$	Highway

Appendix A

Summary of responses by Gill Department Heads regarding ADA Policy Requirements

Effective Communication Checklists

General Nondiscrimination Checklists

Website Checklists

Effective Communication Checklists		Total Responses	
		Yes	No
1)	Does the public entity know how to provide the following for people who are deaf or hard of hearing?		
	a. Sign language, oral, and cued speech interpreters	3	6
	b. Video remote interpreting (VRI) services	1	6
	c. Computer-assisted real-time transcription (CART) services	1	8
	d. Assistive listening devices	1	8
	e. Open and closed captioning of videos	1	12
	f. Real time captioning of television programs	1	4
	g. Other	1	0
2)	Does the public entity know how to provide documents in the following formats for people how are blind or visually impaired and others with print disabilities?		
	a. Braille	1	7
	b. Large print	5	8
	c. Audio recordings	2	12
	d. Accessible electronic formats that can be accessed by screen reading software (plain text or html)	4	11
	e. Screen reader software installed on a computer that is used by the public (ie. library)	1	7
	f. Magnification software installed on a computer that is used by the public (ie. computer lab)	1	7
	g. Optical readers	1	7
	h. Other	0	0
3)	Does the public entity have a policy or procedure to handle requests for auxiliary aids and services?	2	7
4)	Are employees and officials aware of the public entity's obligation to provide auxiliary aids and services?	9	1
5)	Do employees and officials know how to arrange for auxiliary aids and services? Arrangements could be made directly or through the ADA coordinator or another staff person.	4	5
6)	Does the public entity give primary consideration to the person with a disability when determining what type of auxiliary aid or service to provide?	7	1
7)	Are employees and officials aware that it is inappropriate to request that family members and friends of people who are deaf serve as sign language interpreters, except in emergencies or if the individual wants the family member or friend to interpret and it's appropriate to do so?	8	1

Effective Communication Checklists		Total Responses	
	Questions	Yes	No
8)	Are employees and officials aware that a companion of a program participant has a right to auxiliary aids and services if the companion has a communication disability and is an appropriate person with whom the public entity should or would communicate?	4	2
9)	Are captions and audio description provided on videos and television programs the public entity produces and videos on its website?	1	4
10)	Does the public entity have a policy or procedure for determining if an auxiliary aid or service would be an undue financial and administrative burden?	1	7
11)	Do employees and officials know how to respond to telephone calls made through Video Relay Services and Telecommunication Relay Services so that the calls are responded to in the same manner as other telephone calls?	1	7
12)	Where telephones are available to the public for making outgoing calls, such as in hospital waiting rooms, are TTYs available for people with hearing and speech disabilities?	1	3
13)	Do telephone emergency services, including 911, provide direct access to people who use TTYs and computer modems?	2	1

General Nondiscrimination		Total	
		Yes	No
Questions			
1)	Do policies, practices and procedures provide an equal opportunity for people with disabilities to participate in services, programs and activities; that is, do policies not discriminate against people on the basis of disability?	8	1
2)	Are there circumstances in which the participation of a person with a disability would be excluded or restricted?	1	8
3)	If yes, are the exclusions or restrictions necessary to the operation of the program or to the safety of other participants?	1	1
4)	Are there separate services, programs or activities for people with disabilities or a class of people with disabilities?	0	9
5)	Do all employees who contract with outside agencies, organizations or businesses know that the public entity's obligations apply whether the public entity provides the service, program or activity directly or contracts for it?	7	0
6)	Does the public entity notify each contractor of its responsibilities for providing contracted services in a nondiscriminatory manner?	4	1
7)	Does the public entity require assurances from contractors of their fulfillment of Title II requirements?	3	2
8)	Are there procedures to ensure that contractors provide the services, programs and activities in a nondiscriminatory manner consistent with the Title II requirements?	4	1
9)	Are employees and officials aware that the public entity is obligated to make a reasonable modification in policies, practices, or procedures if the modification is necessary for a person with a disability to participate?	8	1

General Nondiscrimination		Total	
		Yes	No
Questions			
10)	Are employees and officials aware that:		
	a. The public entity must allow service animals to accompany people with disabilities in all areas where people without service animals are allowed to go?	9	0
	b. Only two questions may be asked: (1) Is the dog a service animal required because of a disability? and (2) What work or task has the dog been trained to perform?	7	2
	c. The public entity may not ask about a person’s disability, require medical documentation, require a special identification card or training documentation for the dog, or ask that the dog demonstrate its ability to perform the work or task?	7	2
	d. A person with a disability cannot be asked to remove his service animal from the premises unless: (1) the dog is out of control and the handler does not take effective action to control it or (2) the dog is not housebroken and, in these circumstances employees must offer the person with the disability the opportunity to obtain goods or services without the animal’s presence?	7	2
	e. The public entity must permit a miniature horse to accompany a person with a disability where reasonable?	6	3
11)	Are employees and officials aware that:		
	a. People with mobility disabilities may use wheelchairs, scooters and manually-powered mobility aids, such as walkers, crutches, canes, braces, or other similar devices designed for use by individuals with mobility disabilities in any areas open to pedestrian use?	9	0

General Nondiscrimination		Total	
		Yes	No
Questions			
	b. People with mobility disabilities may use other power-driven mobility device in any areas open to pedestrian use unless the public entity can demonstrate that the class of other power-driven mobility devices cannot be operated in accordance with legitimate safety requirements?	8	1
	c. They may not ask about the nature and extent of the individual's disability, but may ask an individual to provide a credible assurance that the mobility device is required because of the person's disability?	7	2
12)	Are employees and officials aware that the public entity may not place a surcharge on people with disabilities to cover the costs of measures, such as the provision of auxiliary aids or program accessibility, that are required to provide nondiscriminatory treatment?	9	0
13)	Are tickets for accessible seats sold during the same hours; through the same methods of purchase (by telephone, on site, through a website, or through third-party vendors); and during the same stages of sales (pre-sales, promotions, general sales, wait lists, or lotteries) as non-accessible seats?	3	0
14)	If accessible seating is not available in areas of the venue with lower prices, is lower priced accessible seating available in higher priced locations?	3	0
15)	Do venues and third-party sellers provide the same information about accessible seats as provided about non-accessible seats?	3	0
16)	Can ticket sellers describe accessible seating in enough detail to permit the purchaser to determine if a seat meets his or her needs?	3	0

General Nondiscrimination		Total	
		Yes	No
Questions			
17)	Do ticket sellers know that people purchasing a ticket for a wheelchair space may purchase up to three additional seats for their companions as close as possible to the wheelchair space and that these companion seats may include wheelchair spaces?	3	0
18)	Do ticket sellers know that unsold accessible seats may be released and sold to members of the general public in only one of three circumstances: when all non-accessible seats have been sold (excluding luxury boxes, club boxes, suites, and seats the venue holds been sold; or when all non-accessible seats in a particular price category have been sold back when declaring a sell-out); or when all non-accessible seats in a particular seating section have been sold; or when all non-accessible seats in a particular price category have been sold?	3	0
19)	If the venue permits patrons to give or sell their tickets to others, does the venue know that the same right must be extended to patrons with disabilities and that those tickets may be sold to someone who does not have a disability?	3	0
20)	Do ticket sellers know that for single event tickets, venues may ask purchasers to state that they require, or are purchasing tickets for someone who requires, the features of an accessible seat?	3	0
21)	Do ticket sellers know that for series of events tickets, purchasers may be asked to attest in writing that they require, or are purchasing tickets for someone who requires, the features of an accessible seat?	2	1
22)	Is information about the public entity’s accessible services, activities and facilities available to the public and to current and future program participants?	5	3

Website Accessibility Checklists

	Questions	Town Website
1)	Is there a policy that the public entity's webpages will be accessible, that is, in compliance with the W3C Web Content Accessibility Guidelines (WCAG) 2.0 or Section 508 Standards?	N
2)	Are the staff and contractors who are responsible for webpage and content development aware of the policy?	Y
3)	Are the staff and contractors who are responsible for webpage and content development knowledgeable about these standards?	Y*
4)	Has the website been tested for compliance with either of these standards?	N
5)	If yes, have people with disabilities who use screen reading software and other assistive technology participated in the evaluation?	
6)	Is there a plan for making the existing web content accessible?	Y
7)	Is there a pln for making future web content accessible?	N

*The website developer is knowledgeable of the standards; town staff are not.

Appendix B

Photographs documenting issues found in the Transition Plan

Gill Elementary School (48 Boyle Road)



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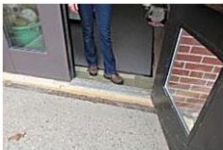
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Town Hall (325 Main Road)



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Gill Public Safety Complex (196 Main Road)



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Slate Memorial Library (360 Main Road)



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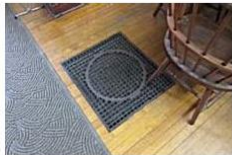
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Riverside Municipal Building (54 French King Highway)



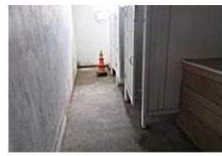
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Blake Town Forest (Hoe Shop Road)



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