

# Camp Sewataro — Introduction



## Town of Sudbury ADA Transition Plan

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### Background

Year Built: 1960

Camp Sewataro is a 44-acre camp located at 1 Liberty Ledge. The property and all structures are owned by the Town of Sudbury, and leased as a camp to a private entity. Recently areas of the camp have been made available for use by the general public when the camp is not in session.

### Legal Requirements

Title II of the ADA requires that state and local governments operate each service, program, or activity so that the service, program, or activity, when viewed in its entirety, is readily accessible to and usable by people with disabilities. A public entity is not required to make each of its facilities accessible to people with disabilities. For example if a town has eight (8) basketball courts in different locations, not all of them have to provide access. The Title II regulations do not stipulate how many of the basketball courts have to be accessible. This is a decision the Town makes. When providing program access the Town is not required to take any action that would result in undue financial and administrative burdens. Alterations to provide program accessibility must comply with the ADA Standards for Accessible Design and 521 CMR, the regulations of the Massachusetts Architectural Access Board (MAAB).

The IHCD team was told to consider four (4) possible operational scenarios for the camp, and to describe the relevant accessibility requirements in each case.

1. As the Town has opened up portions of the camp grounds for public use, the Town currently has obligations to provide “program accessibility” for the activities open to the public. Due to the steep topography of the site and the cost of providing accessible routes, which need to be 5.00% maximum running slope or 8.33% maximum running slope if ramped, with a maximum cross slope in either case of 2.00%. The Town might consider ensuring that the activities and amenities on the property, (e.g., tennis, picnic areas, fishing, soccer, lacrosse, softball,

basketball, sandbox, garden, golfing, and gaga ball) are provided elsewhere in Sudbury at accessible locations.

The Town must provide information concerning the location of the accessible services, activities, and facilities. One way to help make everyone aware of locations where accessible programs are offered in Sudbury is to develop a web site listing these programs and providing accessibility information. The following web address is an example of a web site for the Department of Conservation and Recreation (DCR) in Massachusetts that describes accessible locations and features of DCR program activities in a comprehensive fashion:

<https://www.mass.gov/topics/accessible-recreation>. IHCD also recommends that the Town provide signage at site arrival points to the camp listing the location of the accessible activities that are not accessible at the camp.

2. In the future, if the camp will be run by the Town of Sudbury (instead of by a private entity); the Town of Sudbury will be required to provide “program accessibility” to the camp’s programs, activities and services. As the camp experience would likely be the only program of its kind offered by the Town of Sudbury, the Town would be obligated to provide extensive site-wide renovations, including providing an accessible route from site arrival points to each unique program area and amenity, providing accessible routes between activities and ensuring that public facilities are accessible.
3. If the Town changes residential facilities on the site into Town offices and the offices are open to the public; under 521 CMR, an accessible entrance must be provided and under the ADA “program accessibility” is required. If any portion of the building is open to the public, then accessible parking must be provided as part of “program accessibility.”
4. The camp is currently operated by a private entity. Private entities have obligations under Title III of the ADA. Title III requires that businesses remove architectural barriers in existing facilities when it is “readily achievable” to do so.

Readily achievable means "easily accomplishable and able to be carried out without much difficulty or expense" and is based on the size and resources of a business and the difficulty of removing barriers. The business makes the decision of what barrier removal is "readily achievable." Alterations to provide barrier removal must comply with the ADA Standards for Accessible Design and 521 CMR. Since the camp is currently operated by a private entity and is not a program, service or activity of the Town, the Town is not obliged to ensure accessibility for campers, parents or visitors of the camp.

Following are two (2) reports reviewing accessibility issues at Camp Sewataro:

- The Grounds report analyzes the Town's obligations in its current configuration, where the public is allowed to access certain areas of the site without attending the camp.
- The Buildings report analyzes the Town's obligations if four of the residences on the site are converted into Town offices.