



TOWN OF WILMINGTON

121 GLEN ROAD
WILMINGTON, MA 01887

THE OFFICE
OF TOWN CLERK

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September 4, 2020

ACCESSIBILITY AND EVALUATION OF SHRINERS AUDITORIUM, 99 FORDHAM ROAD, WILMINGTON FOR USE AS POLLING LOCATION FOR STATE ELECTION, NOVEMBER 3, 2020

In accordance with the requirements of Chapter 115 of the Acts of 2020, passed in order to address the many challenges presented by trying to conduct a busy fall election season safely and efficiently in spite of the COVID-19 pandemic, this report addresses the issues of whether the proposed new location meets accessibility standards, whether the public convenience or public health are better served by moving Wilmington's six precincts to the subject location, and finally, whether making this change would have a disparate adverse impact on access to the polls on the basis of race, national origin, disability, income or age.

ACCESSIBILITY

The Commonwealth of Massachusetts has produced a questionnaire intended to address all polling place accessibility issues in light of current ADA standards. The Polling Place and Registration Site Access report has been completed and is attached hereto, along with a labelled overhead photograph of the site and a schematic of how accessible parking spots will be made to comply with the most recent standards.

PUBLIC HEALTH AND PUBLIC CONVENIENCE

It has become conventional wisdom that by wearing masks and maintaining a six-foot social distance, people can keep themselves safe from contracting COVID-19.

Wilmington has had the advantage of having held two elections during the COVID-19 emergency, so there is some sense of the space that its usual polling locations provide for elections and how these locations stood up to the necessary precautions. During the June 20, 2020 Annual Town Election, the Town used its older voting booths, which were "carrel" style with four booths per unit. Space limitations made it necessary to cut down the number of units placed in each precinct from four to two, and also to reduce each unit to two instead of four booths. Thus, instead of 16 available booths per precinct, four were available. Because the turnout for the June election was approximately 500 people, of which 200 voted by mail, this lowered capacity was not an issue.

Between the June election and the September Primary, the Town obtained new marking booths. There are smaller, stand-alone units that can be spaced six feet apart from each other. Even with these, at the Boutwell School and Town Hall, only eight booths could be set up in each of the four precincts housed in these locations, and at the Wildwood that number rose to nine. Although turnout for the State Primary was substantially higher than for the Annual Town Election, because so many voted by mail only approximately 2,500 people voted in person at the polls on the actual election day, which is an average of 410 voters per precinct for the primary. With the new voting booths in the larger space, the per precinct capacity increases dramatically. Each precinct will have 16 booths available for voters, thus doubling current capacity.

Even with continued success and popularity of mail in voting, it is safe to predict that the in person turnout on November 3, 2020 will increase dramatically. To assume that eight or nine booths per precinct will suffice to keep lines down to a manageable level seems unreasonable. These capacities might increase by one or two inside the actual precinct for those who might wait in line to deposit their ballots into the tabulator, but not by any more than that because of the social distancing requirement of six feet between people.

Also, the six foot rule extends beyond the sanctuary of the "inner precinct" out to the hallways of these locations. Thus, instead of three or four people in line within a six foot space, there would now be but one. If it is a cold and/or precipitous day on November 3, it is not unreasonable to predict long lines outside in inclement weather for unknown periods of time. There is also a temporal factor to consider from a health standpoint. While the conventional wisdom is that with a mask and proper distance spread is less likely, it is also conventional wisdom that the longer one is exposed to someone with the virus, the more likely they are to become infected themselves. The longer the wait in line, the longer one is potentially exposed.

The proposed site is in an area that can accommodate an increase in traffic, and is no more than 4.6 miles and a 12-minute car ride away from the furthest current polling location. Should the weather on Election Day be inclement, there is ample inside space for voters to wait in line while adhering to the six-foot distance protocol, and to be sorted into individual precinct lines by personnel whose function will be to greet and direct voters to the proper precinct. Increased voting booth capacity will lead to shorter lines with less waiting time to vote and being exposed to others.

Finally, staff of the Clerk's Office can set up shop at the location, centralizing all functions and ensuring close supervision to ensure that the change in location and experience for the voters is without confusion or complication.

Considering the above facts, it is reasonable to conclude that both the public convenience and the public health would be served by moving the polling locations to a site that is approximately five times the area of Wilmington's current three locations combined (Shriners Auditorium has 37,000 ft², while the combined area of the voting sections within the Boutwell and Wildwood Schools and Town Hall Auditorium is 7,500 ft²).

DISPARATE ADVERSE IMPACT

The final consideration is whether making this change would have a disparate adverse impact on access to the polls on the basis of race, national origin, disability, income or age. None of Wilmington's current polling locations are located at or near public transportation. None are close to public housing, elderly housing or large apartment complexes. Inasmuch as for most people, going to

the polls would involve traveling by automobile, it does not appear that changing any of these locations would impose undue hardship on voters of any protected class.

While it could be contemplated that moving to a larger location might cause the voter to have to walk longer distances to vote at the new location, and this could impact some members of the voting public, it seems necessary to balance this potentially negative factor against having to wait in a longer line, outside in potentially inclement weather. Additionally, the expansion of alternatives to Election Day voting must be factored into any discussion of inconvenience. One can vote by mail, returning one's ballot by mail or personally to Town Hall and placing it in the drop box if one wishes, or in person during the two week early voting session which begins on October 17 and runs daily through October 30.

LOCATION: Shriners Auditorium, 99 Fordham Road, Wilimington DATE: Sept. 3, 2020

WARD: n/a PRECINCT: 1-6

SURVEYOR: Christine Touma-Conway SURVEYOR: _____

TITLE: Town Clerk TITLE: _____

1. Site access (Path of Travel):

X (c) The path of travel is the same or a substantially similar distance for all persons entering the polling place.

Comments (City/Town Representative):	Comments (Monitor):
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2. Parking:

X (a) The required number of handicapped parking spaces is provided as follows:

<u>total no. of parking spaces</u>	<u>no. of handicapped spaces required</u>
1 - 25	1
26 - 50	2
51 - 75	3
76 - 100	4
101 - 150	5
151 - 200	6
201 - 300	7
301 - 400	8
401 - 500	9
501 - 1,000	2% of total
1,001 and over	20 plus 1 for each 100 over 1,000

(b) for parking lots striped prior to 9/1/96:

*X (1) The handicapped parking spaces are 8 feet wide and have an adjacent 4 foot access aisle which is painted or striped yellow. The parking lot is reasonably lit.

*X (2) The handicapped parking spaces are identified by a sign at each space or pair of spaces containing the International Symbol of Accessibility, with the top of the sign between 5 and 8 feet high above the ground.

(c) for parking lots striped after 9/1/96:

_____ (1) The handicapped parking spaces are 8 feet wide and have an adjacent 5 foot access aisle which is marked by high contrast painted lines or other high contrast delineation. The parking lot is reasonably lit.

_____ (2) Is there at least one "van accessible" space. (one in every eight accessible spaces must be van accessible, but no less than one) This space is 8 feet wide and has an adjacent 8-foot wide access aisle which is marked by high contrast painted lines or other high contrast delineation. The parking lot is reasonable lit.

_____ (3) Each handicapped parking space is identified by a sign containing the International Symbol of Accessibility, with the top of the sign between 5 and 8 feet high above the ground. Van accessible spaces shall include the words "Van Accessible."

n/a (d) Any sidewalk provided at the handicapped parking spaces has a curb cut (sidewalk ramp), with a slope no greater than 1:12, at each space or pair of spaces.

n/a (e) If no parking lot is available, there is at least one on-street parking space which is at least temporarily designated as a handicapped parking space during the election in front of the polling place.

Comments (City/Town Representative): *see attached	Comments (Monitor):
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3. Entrance

X (a) At least one entrance to the building is accessible.

X (b) The approach to the accessible entrance is a paved walk or ramp with a non-slip surface uninterrupted by steps or changes in level greater than 1/2 inch. There is a level space 60 inches from the door on both the exterior and interior sides.

*
 (c) Lever handles or other accessible hardware are provided on doors, so that they may be operated with a closed fist.

X (d) Doorways are at least 32 inches clear width. Door thresholds are no higher than 1/2 inch above the floor.

X (e) If the main entrance is not accessible, signs direct people to the accessible entrance.

X (f) If the accessible entrance is not the main entrance, it is unlocked and able to be used without assistance during the same hours as the main entrance.

<p>Comments (City/Town Representative):</p> <p>*Outdoor handicapped access door will be kept open. Doorway leads into a short hall which leads into the voting area.</p>	<p>Comments (Monitor):</p>
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4. Ramps

n/a (a) If the entrance has stairs, there is either a permanent or portable ramp. If permanent, the ramp has a slope no steeper than 1:12.

n/a (b) The ramp is at least 48 inches wide.

n/a (c) The ramp has two pairs of handrails along both sides that are round or oval in shape and are set in pairs, one at a height between 34 and 38 inches and a lower one at a height between 18 and 20 inches.

n/a (d) If the ramp is portable, it is as close to 1:12 as possible, and either handrails or wheel guards at least two inches high on both sides are provided.

(e) Please describe the portable ramp (if applicable):

n/a

Comments (City /Town Representative):	Comments (Monitor):

5. Building Interior

X (a) All interior doors, approaches, and ramps necessary to obtain access to the polling place comply with 3 and 4 above.

X (b) An accessible route which provides a continuous unobstructed path at least 36 inches wide is maintained inside the polling place and shall coincide with the route for the general public.

Comments (City/Town Representative):	Comments (Monitor):
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6. Voting Equipment

X (a) All Polls - A sample ballot will be posted on the wall no higher than 48 inches above the floor.

n/a (b) Paper or Datavote ballots - At least one marking shelf (one for each party in a primary for Datavote) provides a clear space under it at least 30 inches wide, at least 27 inches clear to the underside, and no more than 32 inches high to the top. Any Datavote stylus handle is at least 1 ¼ inches thick and at least 3 inches long.

n/a (c) Voting machines - At least one machine has a sample ballot posted inside, not higher than 48 inches.

n/a Voting levers are no higher than 48 inches above the floor, or a "reacher" is available for the upper levels.

Comments (City/Town Representative):	Comments (Monitor):
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PLEASE SEND THE COMPLETED SURVEY TO:

OFFICE OF THE SECRETARY OF THE COMMONWEALTH
ATTN: Bridget Simmons Murphy
Office of the Secretary of the Commonwealth
Elections Division
1 Ashburton Place, 17th floor
Boston, MA 02108

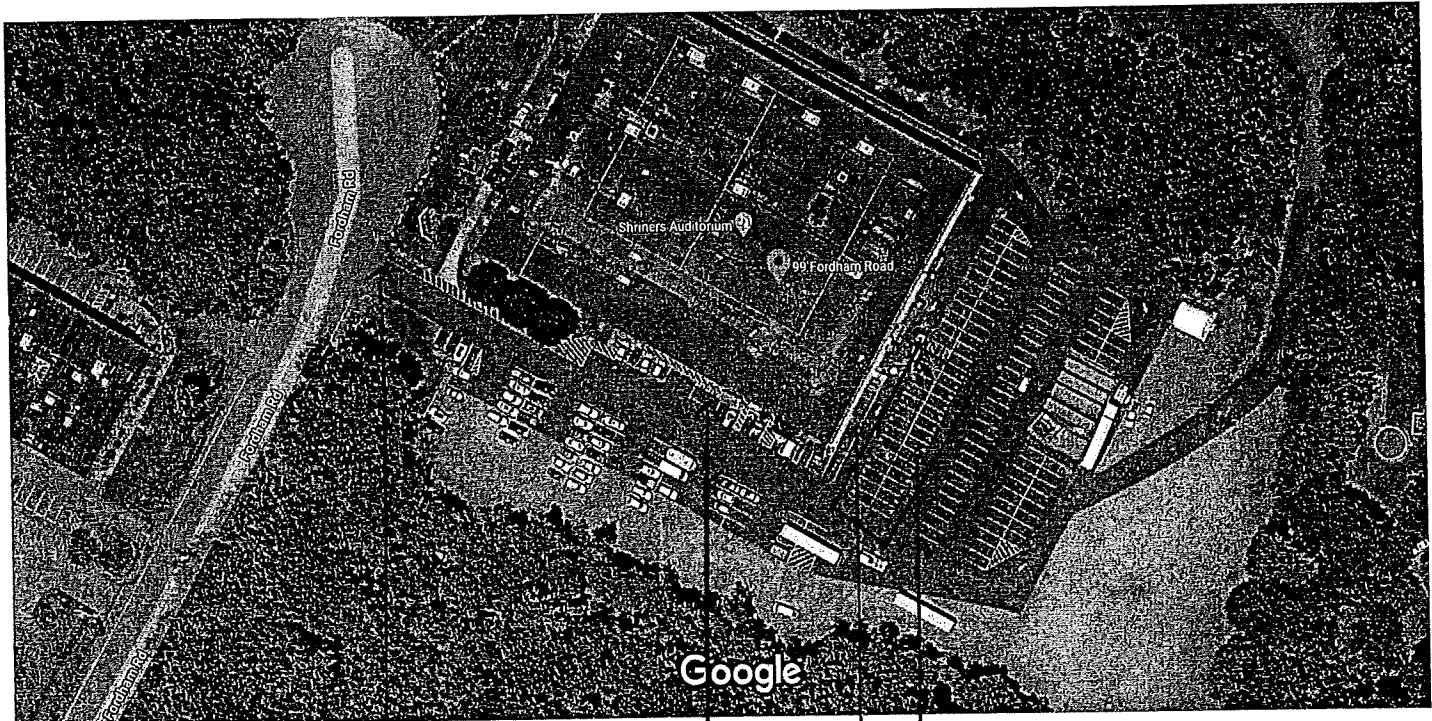
ADDENDUM TO POLLING PLACE AND REGISTRATION SITE ACCESS SURVEY

Item 2(a) and (b) Number and Marking of Handicapped Accessible Spaces

The site parking lot is a reverse "L"-shaped lot, contouring with the side and rear of the building. It contains about 175 available spots immediately adjacent to the side and rear of the building. There are entrances available on both sides, with the handicapped entrance and spots, as well as the majority of non-handicapped spots, at the rear of the building. On Election Day, signage will be posted indicating where the handicapped parking and accessible entrance are located. This signage will direct voters towards the rear part of the parking lot where both the handicapped spots and accessible entrance are located. A labelled overhead satellite picture is attached to provide perspective.

There are 28 marked handicapped spots, each 9 feet wide. None are marked as van accessible, nor do any have the requisite adjacent access aisles. To remedy this situation, for Election Day the town will install temporary signage to create 4 van accessible spaces (using 8 of the spots), and then use one spot between each other two spots to provide the required access aisles for each available parking space of 4.5 feet each, thus making 10 accessible spots available. These 14 spots well exceed the required six spots based upon the chart listed in the survey. A roughed out schematic is included at the bottom of the satellite picture attachment.

99 Fordham Rd



Imagery ©2020 MassGIS, Commonwealth of Massachusetts EOE, Maxar Technologies, Map data ©2020 50 ft

Parking Lot Entrance

Handicapped Parking Spots

Handicapped and Secondary Entrance

Entrance

Temporary Handicapped Spot Markings

9'	9'	9'	9'	9'	4.5'	4.5'	9'	4.5'	4.5'	9'	4.5'	4.5'	9'	4.5'	4.5'	9'
	VAN 1	VAN 2		1			2			3			4			5
	VAN 3	VAN 4		6			7			8			9			10