

To: Milton Commission on Disability Date: June 23, 2020  
From: Bob Carasitti BFA No.: BBS 19-001  
Subject: The Faulkner House at Milton Academy – Milton, MA – Renovation & Alterations

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## **PROJECT DESCRIPTION**

The proposed project includes renovations and alterations to provide a quarantine capable dormitory for the school. Students who require quarantine (but who are not diagnosed with COVID 19) will be housed in the building on a temporary, "as necessary" basis. Any student who is diagnosed with COVID 19 or requires medical care beyond the typical school nurse program, will be transported to appropriate medical care facilities.

The existing Faulkner House contains the school's Health Center (school nurse program) on the 1<sup>st</sup> Floor. Former dormitory rooms and faculty dwellings occupy the 2<sup>nd</sup> and 3<sup>rd</sup> Floor. Rooms on the 1<sup>st</sup>, 2<sup>nd</sup> and 3<sup>rd</sup> Floors will be renovated and altered into 12 sleeping units each having a single bed and a private bathroom. One of the 12 will be a Group 2B accessible sleeping room (1st Floor). The Health Center will also be renovated and altered to include 1 dedicated COVID 19 entrance and exam room and 2 standard exam rooms (non-COVID).

The upper 2 floors will contain only sleeping units (no public or common use spaces) and the basement is used solely for storage and building mechanical, electrical and plumbing services (no public or common use spaces).

See Attachment #1 – Drawings (11x17 Format)

## **521 CMR JURISDICTION 3.3.2**

- The building's assessed value (not including land) is \$955,000 (See Attachment #2).
- 2020 Equalized Ratio is 0.94
- 30% of the equalized assessed value is \$304,787
- Projected project costs are \$350,000

Section 3.3.2 is applicable as the 30% threshold is exceeded. Therefore, the whole building is required to be comply with 521 CMR for new construction (3.3.2).

## **28.00 ELEVATORS REVIEW**

Section 28.1 requires each level (including mezzanines) in multi-story buildings to be served by an accessible passenger elevator<sup>1</sup>.

Exception G permits omission of the elevator in transient lodging facilities less than 3 stories in height, and where all accessible rooms and all public and common use spaces are on the accessible level. Because the existing Faulkner House is 3 stories (not less than 3 stories) the exception is not applicable by right.

Exception E allows the installation of a platform lift or LULA, if permitted by 28.12.1. 28.12.1 item d allows the use of a lift or LULA because each floor is less than 3,000 sf. It is noted that vertical travel distance to serve all floors exceeds 25 feet of travel and therefore, a variance from the elevator board would be required to use a LULA (limited to 25 feet of vertical travel) or a Platform Lift (limited to 12 feet of vertical travel).

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<sup>1</sup> It is noted that the federal ADASAD requirements do not require an elevator, platform lift or LULA to be installed because each floor is less than 3,000 sf in area (ADASAD 206.2.3 Exception 1).

## **REQUESTED RELIEF**

**Full Relief** is requested from section 28.1 to omit providing access to the Basement, 2<sup>nd</sup> and 3<sup>rd</sup> Floors as the installation of an Elevator, LULA or platform lift is technologically infeasible and would result in excessive costs without substantial benefit to persons with disabilities.

If full relief is not acceptable to the AAB, then modified relief will be requested by one of two alternatives:

1. **Modified Relief** is requested to provide a Platform Lift or LULA to serve between the 1<sup>st</sup> and 2<sup>nd</sup> Floors. A variance from the elevator Board is not required as vertical travel distance is less than 10 feet.
2. **Modified Relief** is requested to provide a LULA to serve between the 1<sup>st</sup>, 2<sup>nd</sup> and 3<sup>rd</sup> Floors. A variance from the elevator board is not required as vertical travel distance is less than 25 feet (17'6" actual).

In either modified relief options, an additional request for "time relief" is necessary to allow the building to open at the beginning of the school year, as the installation of the vertical access will not be complete by the end of August.

## **TECHNOLOGICALLY INFEASIBILITY**

**Structural Modifications** - The existing building was originally constructed as a one family dwelling using light weight, stick frame, Type VB construction to support residential loads. The installation of a new shaft system requires structural upgrades to facilitate the opening of floors and reinforcement of structural systems and foundation to support the elevator, LULA or platform lift loads.

**Loss of Usable Floor Space** – The installation of the elevator will require further alterations in specific locations to access the differing floor areas. See Attachment #3 for Studies. At a minimum, sleeping units and/or bathrooms serving the health center (including the new accessible bathroom installed last year) will be lost.

## **EXCESSIVE COST**

Currently we are seeking specific costs estimates for each item below.

**Elevator Costs** - Estimates are being obtained for the installation of an elevator. These estimates are expected to average \$150,000 and \$200,000 (4 stop elevator) and would increase the project budget by more than 33% just because of the elevator itself and not including the additional costs related to structure, electrical and other improvements.

**LULA Costs** - Estimates are being obtained for the installation of a LULA to serve between 1<sup>st</sup>, 2<sup>nd</sup> or 3<sup>rd</sup> Floors. These estimates are expected to average \$100,000 or more (for a 3 stop LULA) and would increase the project budget by approximately 33% just because of the elevator itself and not including the additional costs related to structure, electrical and other improvements.

**Platform Lift Costs** - Estimates are being obtained for the installation of a Platform Lift to serve between 1<sup>st</sup> and 2<sup>nd</sup> Floors. These estimates are expected to average \$40,000 to \$50,000 or more (for a 2 stop Platform Lift) and would increase the project budget by more 20% just because of the elevator itself and not including the additional costs related to structure, electrical and other improvements.

## BENEFIT TO PERSONS WITH DISABILITIES

**Public Use & Common Use Spaces** – Because there are no public use or common use spaces in the basement or on the 2<sup>nd</sup> or 3<sup>rd</sup> Floors, there is no benefit to persons with disabilities for the public use or common use consideration. The public and common use areas are all on the accessible 1<sup>st</sup> Floor and compliant.

**Sleeping Unit Residents** – Because there is a total of 12 beds in the dormitory sleeping units (4 on 3<sup>rd</sup> Floor, 7 on 3<sup>rd</sup> Floor and 1 on 1<sup>st</sup> Floor). Only 1 sleeping unit is required to be Group 2B compliant. The 1<sup>st</sup> Floor sleeping unit is designed to be that room. Therefore, the sleeping units on the 2<sup>nd</sup> and 3<sup>rd</sup> Floor are not required to be, and will not be, accessible.

Likewise, because only 1 sleeping unit is required to be accessible and all the units are effectively the same (cost, size, amenities), there is no requirement to distribute on a floor other than the 1<sup>st</sup> Floor.

**Guests to Sleeping Units** - The only benefit that will not be realized is that persons with disabilities will not be able to visit persons in the inaccessible sleeping rooms of the 2<sup>nd</sup> and 3<sup>rd</sup> Floors. The quarantine aspect of this facility means that visitors are not permitted in these areas any way. In the future, should the quarantine aspect no longer be needed, the public use and common use spaces on the 1<sup>st</sup> Floors will accommodate visitors and the accommodation plan is to have residents meet visitors on the 1<sup>st</sup> Floor. This approach is no different from a scenario with a 2 story dormitory using exception G to 28.1 where no elevator is provided.

## TWO STORY DORMITORY COMPARISON

Considering all of the aforementioned, the proposed building without vertical access (full relief) will function the same as any two story dormitory which is not required to have an elevator because the common use and public use spaces are on the accessible floor. The only difference is that the Faulkner House has a small 3<sup>rd</sup> Floor with only 4 non-accessible sleeping units. These 4 units will have the same accommodation plan as the 2<sup>nd</sup> Floor units in the two story dormitory scenario.

For all the stated reasons, we feel it is appropriate to provide the full relief being requested.