FBC Accessibility 8th Edition (2023) Advance Building Code Review Course

Presenters

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Learning Objectives

- ◆ Review the "2010 ADA Standards for Accessible Design" and the Florida Building Code Accessibility, 7th Edition (2020) (Florida Accessibility Code) updates as they apply to the field of landscape architecture in Florida
- ◆ Review ABA Standards for outdoor developed areas (recommended "Best Practice" for ADA sites and facilities)
- ◆ Discover common issues, confusion, questions, interpretations and errors encountered in the application of Standards



Accessibility Standards - FLORIDA

- ◆ "Florida Building Code Accessibility, 7th Edition (2020)"
 - based on the "2010 ADA Standards for Accessible Design" https://codes.iccsafe.org/content/FLAC2020P1
- ◆ Adopted pursuant to Section 553.503, Florida Statutes
- ◆ Includes more restrictive requirements than ADA Standards such as:
 - elimination of exclusion for private clubs
 - o accessibility to all levels of a building, structure or facility
 - o expanded parking space, striping and parking requirements
 - accessible restroom layout



LATIS Pending

ASLA is in the final stages of publishing a new LATIS entitled,

Principles of Accessibility Design for Landscape Architecture: ADA, ABA and Other Accessibility Standards and Guidelines

It will present both a broad approach to accessible design and technical overview of a variety of national accessibility standards and guidelines.

This document is intended as a tool to help for landscape architecture professionals, educators, and students successfully incorporate inclusive design considerations in practice.

There are charts that illustrate processes to ensure sound accessibility design, a photo essay of "The Good, The Bad & The Ugly" accessibility results, and a quick reference table to the ADA Standards. The report is intended as a deskside resource.



Who enforces the ADA? (a standard)

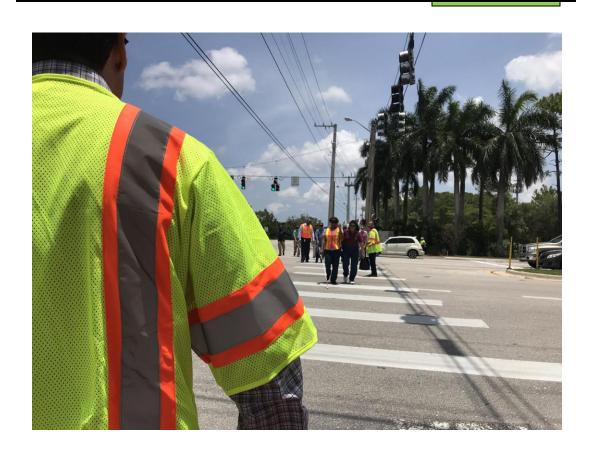
◆ U.S. Department of Justice (as a civil rights violation)





Who enforces the FAC? (a code)

◆ It starts with the Building Official





Waivers Florida

- ◆ The Building Official in the jurisdiction of the site interprets whether the design meets accessibility standards.
- ◆ In Florida, waivers may be requested for any Floridaspecific requirement more restrictive than and ADA Standard, and are typically granted for vertical accessibility concerning historic structures.

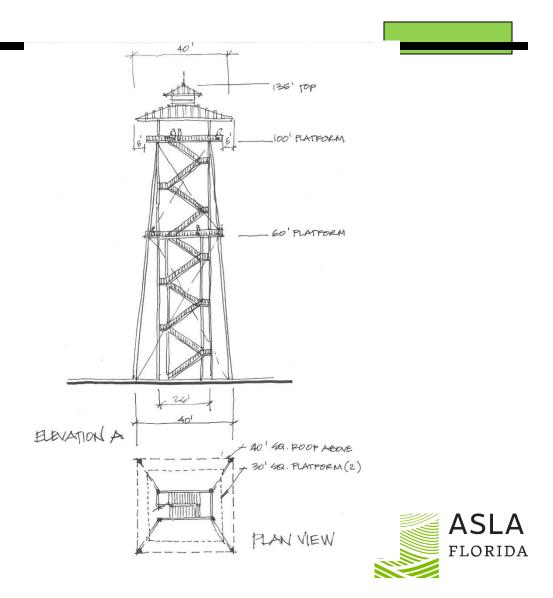
Are there waivers for federal ADA standards?





Tower Example

- ◆ Client wanted a 100' observation tower
- ◆ NO elevator



Tower Example – 60' Platform



Perspective View to Northeast



Top Platform View to Northwest



Perspective View to Southeast

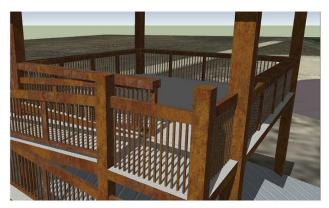


Tower Example – 25' Platform

With Ramp



Perspective View to Northeast



Platform View to Northeast



Perspective View to Northwest



Exemptions

♦ Churches



◆ Private clubs NOT exempt in Florida





Newly Designed or Constructed Buildings or Facilities

◆ Temporary



◆ Permanent





Historic Buildings and Facilities

- ◆ To the maximum extent feasible, with limited exceptions for:
 - accessible route
 - o entrances
 - o toilet facilities
 - o in cases that would threaten or destroy the historical significance
- ◆ Consult with the State Historic Preservation Officer (SHPO)





Alterations

- ◆ Alteration change to a building or "facility"…that affects…usability (except) normal maintenance
- ◆ Facility —
 all or any portion of
 buildings, structures, site
 improvements, complexes,
 equipment, roads, walks,
 passageways, parking
 lots…located on a site



What % of your practice is alterations? New construction?



Alteration Thresholds

When are alterations required to meet Standards?

- ◆ Title II (government)
 Unless it would create a
 "fundamental alteration in
 nature of program or incur
 an undue financial or
 administrative burden"
- ◆ Title III (private)

 "Readily Achievable" —

 easily accomplishable and able to be carried out without much difficulty or expense





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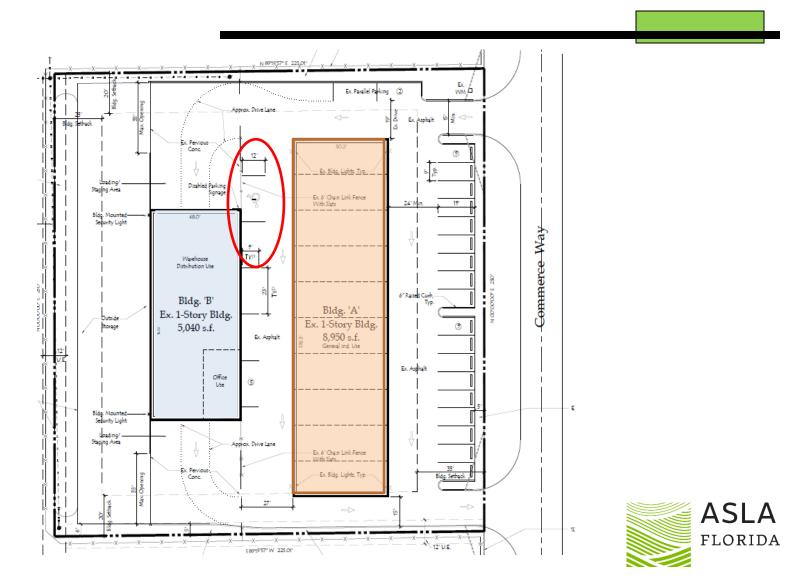
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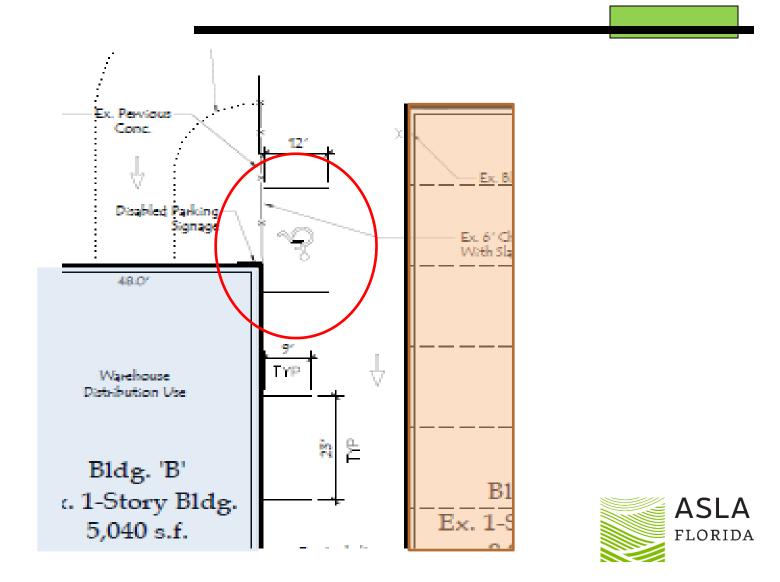




Alterations



Alterations



Alteration Exception

- "Technically Infeasible" (alteration)
 - o little likelihood of being accomplished because of existing structural (or) site constraints that prohibit modification
 - o still requires accessibility to the maximum extent feasible



Example:

- Ramp run at maximum slope exceeds 30'
- Should/could handrail be added? Why?



Alterations to Primary Function Areas

- ◆ Alterations affecting primary function area(s) shall ensure the:
 - o path of travel to the altered area
 - support facilities
 are readily accessible unless
 cost is "disproportionate"

How is "disproportionate" determined?



Exceeds 20% of the cost of alteration to the primary function area.



Accessible Path of Travel

- ◆ Priorities for accessible features when path of travel and support facilities costs exceed 20%:
 - o accessible entry
 - o accessible route to altered area
 - o minimum of one accessible toilet room for each sex or a single unisex toilet room
 - o accessible public drinking fountains
 - accessible parking



Could this impact a project budget? EXPLAIN?



Equivalent Facilitation

- ◆ Other designs and technologies are permitted if they provide substantially equivalent or greater access to and usability of the facility
- ◆ Burden of proof lies with the covered entity





Why should you be concerned about designing to Standards?

- ◆ Dateline: Wednesday, June 30, 2021
- "Justice Department Reaches Agreement with the City of Killeen, Texas to Improve Access for Individuals with Disabilities"
 - ...equal access in its programs, services, facilities...
 - ...remove barriers in buildings such as City Hall, police stations, libraries, community centers, places of recreation...
 - ...changes to parking, routes into buildings, entrances, signage, service counters, drinking fountains, auditoriums and arenas...



Common Areas of Confusion

(as reported by the Access Board)

- ◆ Space Allowances
- ◆ Accessible Routes
 - o from boundary of site
 - crossing vehicular ways
 - program access requirements
 - changes in level
- ◆ Protruding Objects
- Stairs, Ramps, and Curb Ramps
- **◆** Parking
 - scoping requirements
 - location and dispersion
 - technical requirements

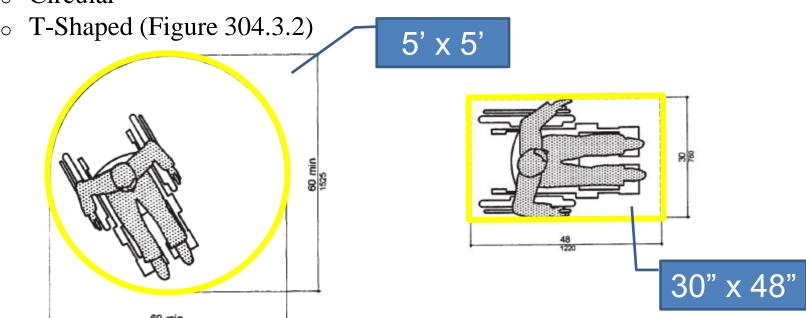




◆ Turning Space

◆ Clear Floor or Ground Space

Circular

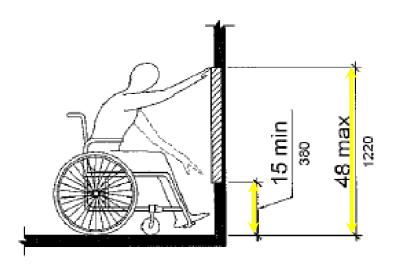


- o spaces permitted to include knee and toe clearances
- o can overlap when elements are in close proximity

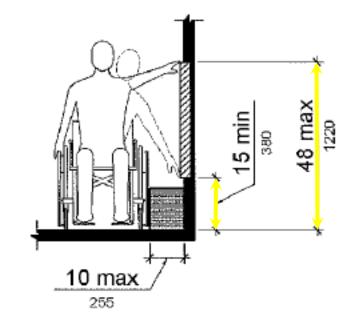


Reach Ranges

◆ Unobstructed forward reach



◆ Unobstructed side reach





- ◆ At each accessible element
- ◆ What is the special criteria for drinking fountains?







Bus Stop Boarding Area/Shelter

- ◆ Boarding area
 - o within or outside of shelter
 - o same slope as roadway side to side; 1:48 front to back
 - o 60" wide x 96" deep space
- ◆ Shelter
 - o 30" x 48" space
- ◆ On an accessible route

Can the seating space and boarding area space overlap?





Door Maneuvering Clearances

- ◆ 32" minimum clear through-width
- ◆ Clear and level floor space allowance requirements vary based on door swing and approach
- ◆ Doors may swing into floor space allowance requirement

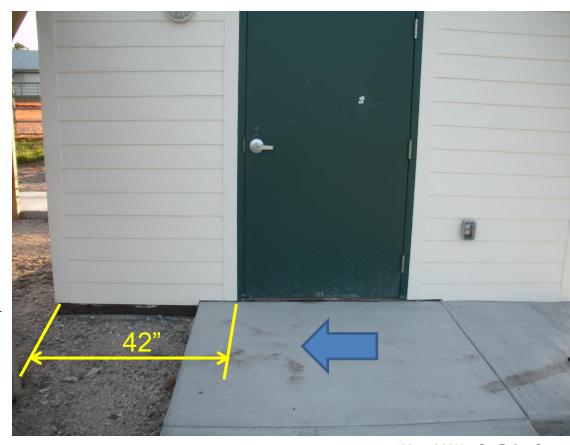


Example: front approach



Door Maneuvering Clearances

- ◆ 32" minimum clear through-width
- ◆ Clear and level floor space allowance requirements vary based on door swing and approach
- ◆ Doors may swing into floor space allowance requirement



Example: side approach



Wheelchair Companion Seating

- ◆ 36-in. x 48-in. minimum floor space front entry
- ◆ 36" x 60" side entry
- ◆ 33" wide per space if more than one at that location
- ◆ Cannot conflict with accessible route
- ◆ What concern does this example illustrate?





- ◆ At least one accessible route within the boundary of the site shall be provided from each
 - public transportationstop, street or sidewalk
 - accessible parking and passenger loading zone





What about access from boundary through parking lots?

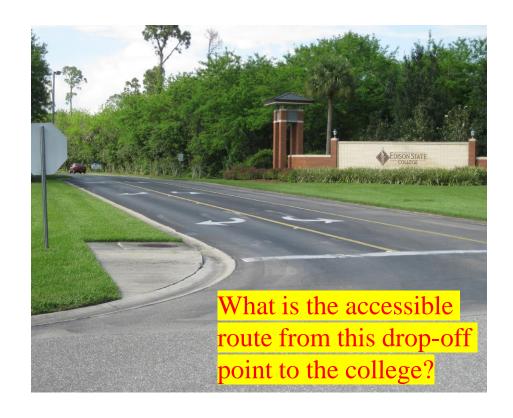
◆ Access may include vehicular ways when provided specifically for pedestrian access such as within a shopping mall parking lot — if it meets all other criteria for an accessible route



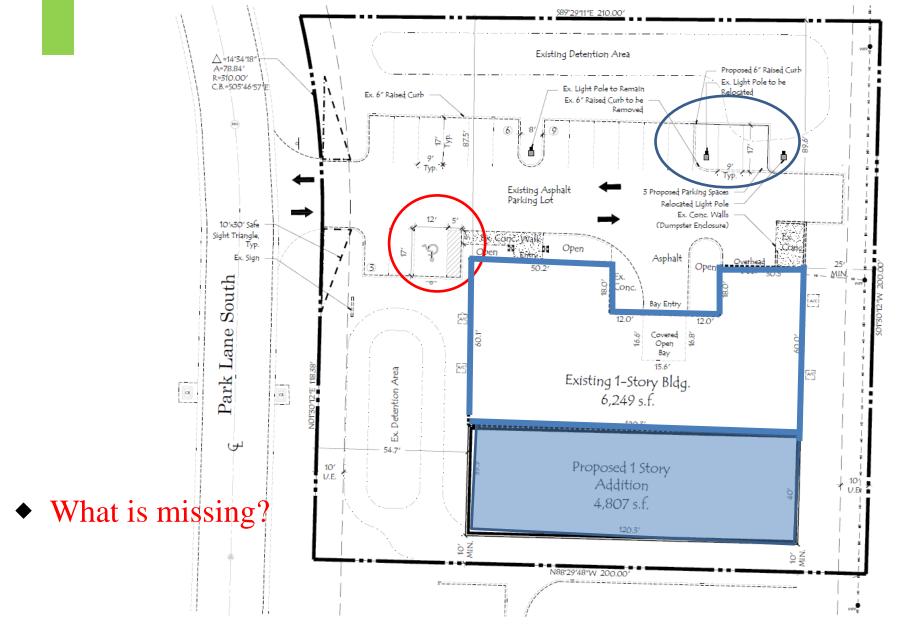


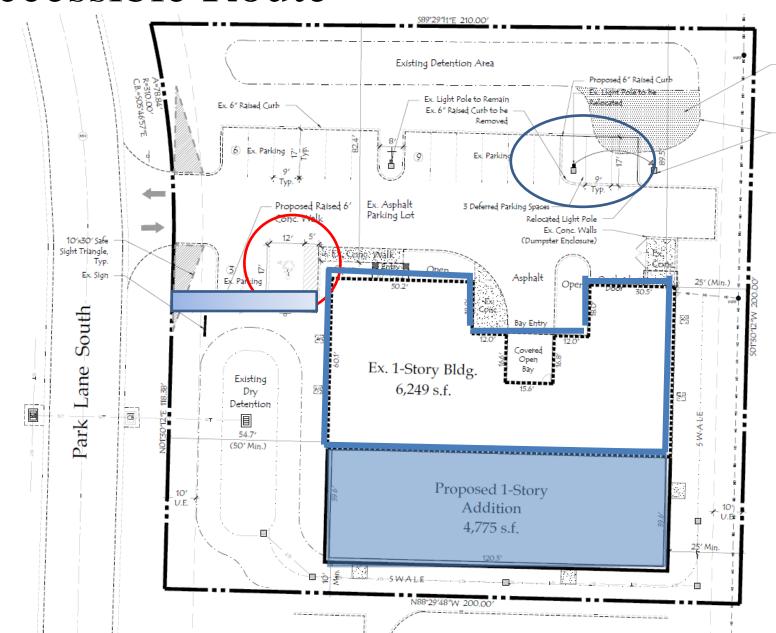
Exception

- ◆ Accessible route not required if only means of access is a vehicular way not "providing" pedestrian access
 - between site arrival points, including accessible parking spaces, and the building or facility entrance
 - within a site between accessible buildings and facilities









- ◆ At least one accessible route within the boundary of the site, coinciding with general circulation paths, shall connect facilities, elements and spaces
 - Given that at least 60%
 of all public entrances
 must be accessible –
 what is the implication
 for the accessible route?





Assembly Areas

Wheelchair Locations

◆ Lawn seating shall connect to an accessible route



◆ Seating directly connected by accessible route to performance and performer-support areas





- ◆ Min. 36-in. clear width EXCEPT
 - 44" from accessible parking (Florida only)
 - o doorways (32")
- ◆ Passing space min. 60" clear not to exceed 200' apart
- ◆ 1:48 max. cross slope
- ◆ No stairs, steps or escalators



FLORIDA

- Each story in multi-story facilities
- Wide range of recreational facilities
 - limited exceptions, including areas used solely for refereeing, judging and scoring.
 - o Pressboxes?

While having certain exceptions in the ADA, pressboxes are **NOT** exempt in FAC







Vertical

• A retail store has a bonus loft accessed by a staircase which would be a great space for team meetings.

Can they use the space for meetings or offices?



Thresholds

- ◆ Changes in level
 - o < 1/4 inch vertical
 - o 1/4 1/2 inch w/ bevel
 - o > 1/2 inch = ramp



Ramps in alterations may be as steep as 1:8 up to 3" height.





Gratings

- ◆ Spaces no greater than ½-in. wide in one direction
- ◆ Elongated openings placed so that the long dimension is perpendicular to the dominant direction of travel





Raised Traffic Islands

◆ Cut through level with the street, OR...





Raised Traffic Islands

◆ Curb ramps at both sides and a level area at least 48" long between the curb ramps





Raised Traffic Islands

- Cut through level with the street,OR...
- Curb ramps at both sides and a level area at least 48" long between the ramps





Circulation Paths

◆ If leading edge 27"—80" from ground surface, object may protrude max. 4" from a wall

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◆ If leading edge 27"—80" from ground surface, object may protrude max. 12" from post





Circulation Paths

◆ Between double posts > 12" apart, low edge 27" max. from ground surface



◆ 80-in. min. clear headroom from single post or between double posts > 12" apart





FLORIDA

Circulation Paths

What could possibly go wrong in this picture?





Circulation Paths

 What about cantilevered drinking fountains? They are required for wheelchair access, right?

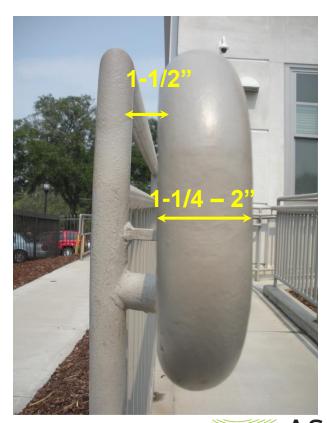




Handrails

Ramps, Stairs and Level Walkways (if used)

- **♦** Characteristics
 - o 34 38" to top of rail
 - o 1-1/4 2" diameter, OR perimeter dimension 4 6-1/4"
 - o rounded, grippable cross-section
 - o 1-1/2" from side wall





Stairs

Only When Part of a Required Means of Egress

- ◆ Uniform rise and tread width
- ♦ Min. 11" tread
- ◆ No open risers
- **♦** Nosing
 - o not abrupt
 - o maximum ½" radius curvature





Stairs Handrails

- ◆ 34 38" high to gripping surface, both sides of stairs
- ◆ 1-1/2" clear to wall
- ◆ Top extension horizontal, one tread width beyond top riser
- ◆ Handrail end must return to post, wall or landing
- ◆ Bottom extension at slope, one tread width beyond bottom riser.

Can this extension ever be shortened or eliminated?

Note: Skateboard restrictors cannot be used. Why?







Ramps Application

- ◆ If vertical elevation change > ½"
- ◆ If slope > 1:20 (5%)
- ◆ 36" minimum width





Ramps Slopes

◆ 1:12 to < 1:16 – max. rise 30"

◆ 1:16 to < 1:20 – max. rise 30"

Can a ramp ever be steeper than 1:12?

Exception for alterations but never steeper than 1:8





Question....

Can a ramp be longer than 30' between landings?





Answer.....

YES

- \bullet 1:12 to < 1:16 max. rise 30" (30' to 40')
 - o exception for alterations but never steeper than 1:8
- \bullet 1:16 to < 1:20 max. rise 30" (40' to 50')

Slope at 5% (1:20) or less NOT a RAMP



Ramps Landings

- ◆ Landing minimum 60" length and width if change of direction
- ◆ Less than 1:48 slope in any direction







Ramps Landings

Why are curved ramps not recommended?

- ◆ Avoid compound slopes that exceed maximum standards
 - ◆ Avoid landing slopes > 1:48





FLORIDA

Ramps Handrails

- ◆ Both sides of ramp runs if rise > 6" (No handrail required if rise 6" or less)
- ◆ Inside railing continuous at switchbacks





Ramps Handrails

- ◆ Extend 12" from ends of ramp parallel to landing surface at top and bottom of ramp
- ◆ Handrail end must return to post, wall or landing





Ramps Handrails

◆ Improper handrail design? Why?





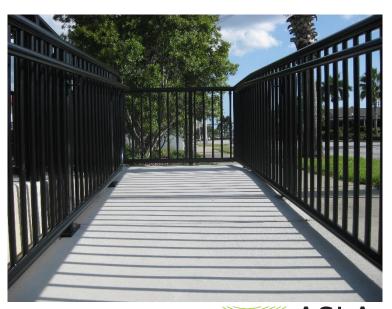


Ramps

Edge Protection – Ramps and Landings

- ◆ Curb or barrier preventing passage of 4" diam. sphere, OR
- ◆ 12" extended width on sides beyond handrails Why?







Ramps

Edge Protection – Ramps and Landings



- ◆ Wheelchair wheels?
- ◆ Stroller wheels?

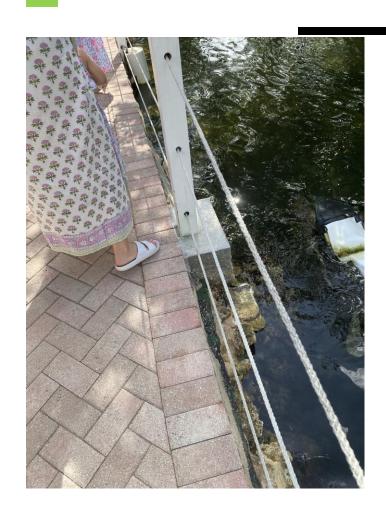


- ◆ Children?
- ◆ Cane and crutch tips?



Edge protection.....

Period....







◆ Must not project into the travel way







◆ Located outside of disabled parking spaces and access aisles







Non-compliant

◆ Located outside of disabled parking spaces and access aisles

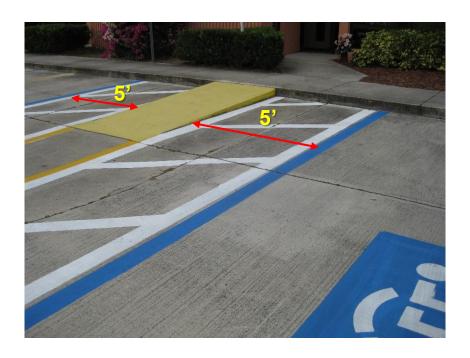






Non-compliant

◆ Located outside of disabled parking spaces and access aisles







Transitions

◆ 36-in. deep x full width of ramp for landing size at top of curb ramp (new construction)





Transitions

What is the maximum slope of flared sides?

Maximum slope of flared sides shall be 1:10

...OR, alterations exception: if 36-in. top landing is unachievable,1:12 is the maximum slope





Detectable Warnings Use

◆ Curb ramps (DOT only)









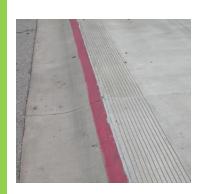
Detectable Warnings

Private Property – Standard not ADA required Some options below:









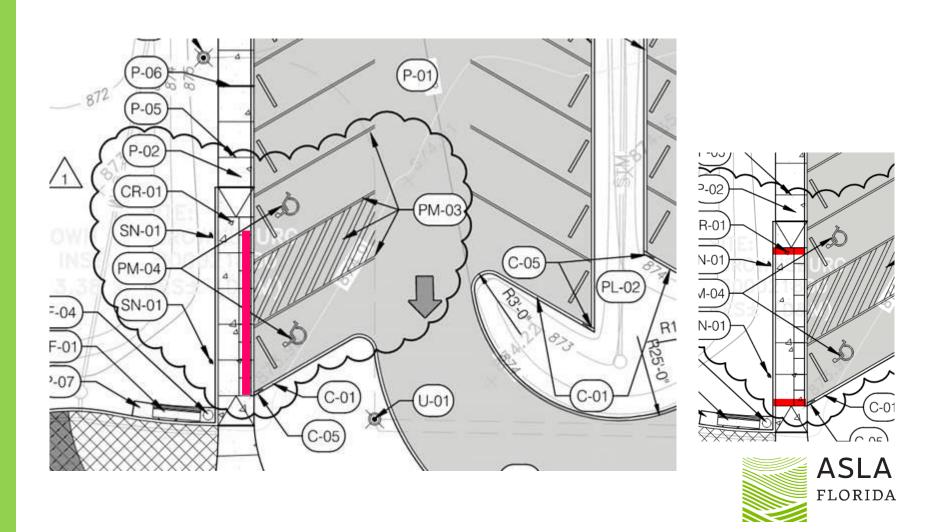




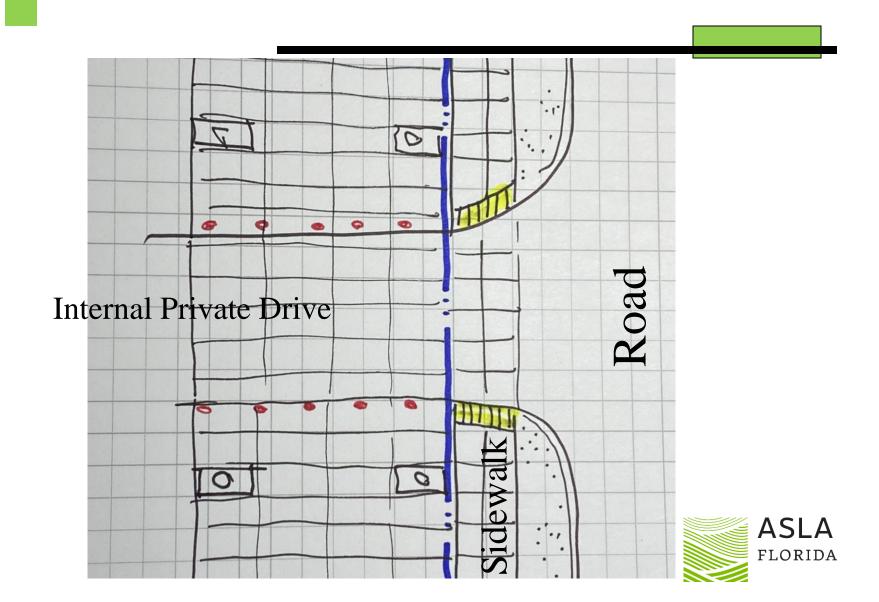




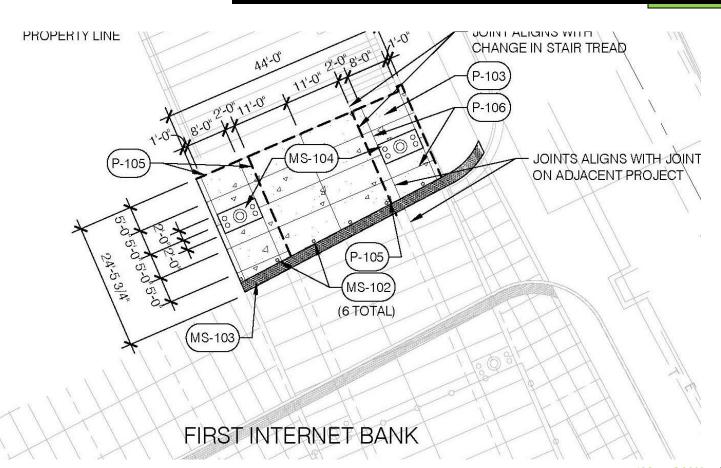
Detectable Warning or not?



Detectable Warning or not?



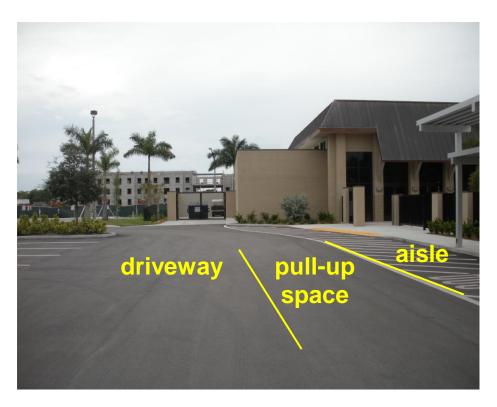
Detectable Warning or not?





Passenger Loading Zone

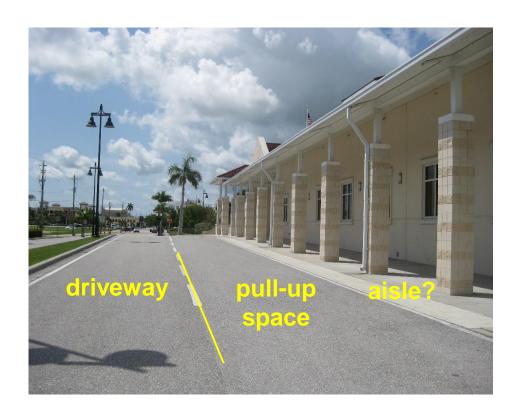
- ◆ One accessible passenger loading zone per 100' loading zone space
- ◆ What are the 3 components of a PLZ
- ◆ Marked 60" wide access aisle at same level as pull-up space
- ◆ Required on these facilities even when no PLZ planned:
 - Valet parking
 - Medical and long-term care where stay >24 hrs





Passenger Loading Zone

◆ Does this Passenger Loading Zone meet the Standards?





Accessible Parking Spaces

- Summary of required quantities (round up)
 - o 1 per 25 vehicles up to 100 (4 total), plus
 - o 1 per 50 vehicles up to 200 (6 total), plus
 - o 1 per 100 vehicles up to 500 (9 total)
 - o 1 in 6 accessible spaces shall be van space when appropriate (In Florida van & vehicles the same EXCEPT for height which is?...) 98"
 - special requirements for medical, theme parks, residential





Location of Parking

and Accessible Route

- ◆ Accessible parking spaces serving a particular building shall be located on the shortest accessible route
- ◆ Spaces shall be located to not compel the user to pass behind parked vehicles other than his or her own



Does this parking area comply with the requirements?



Location of Parking

and Accessible Route

- ◆ Accessible parking spaces serving a particular building shall be located on the shortest accessible route
- ◆ Spaces shall be located on an accessible route that must not compel the user to pass behind parked vehicles other than his or her own



What about accessible route marking?



Location of Parking

and Accessible Route

What about grass overflow or temporary unpaved lots?

- Required for temporary and unpaved parking lots
- ◆ Parking spaces permitted to be located in different parking facilities if greater accessibility provided





Accessible Parking Spaces

◆ Car (Van)

- o min. 12' wide space + 5' aisle
- o 2 spaces may share an aisle
- o aisle must be marked
- space and aisle slope 1:48 max.in any direction
- sign required for each space
- o (min. 98" vertical clearance)





Accessible Parking Signs

- International symbol of accessibility
- "Parking by Disabled Permit Only"
- ◆ Must indicate the penalty for illegal use of the space.
- Mounting height 60" min. to bottom of sign
- "Van Accessible" where required (informative, not restrictive)

Florida







Accessible Parking Signs















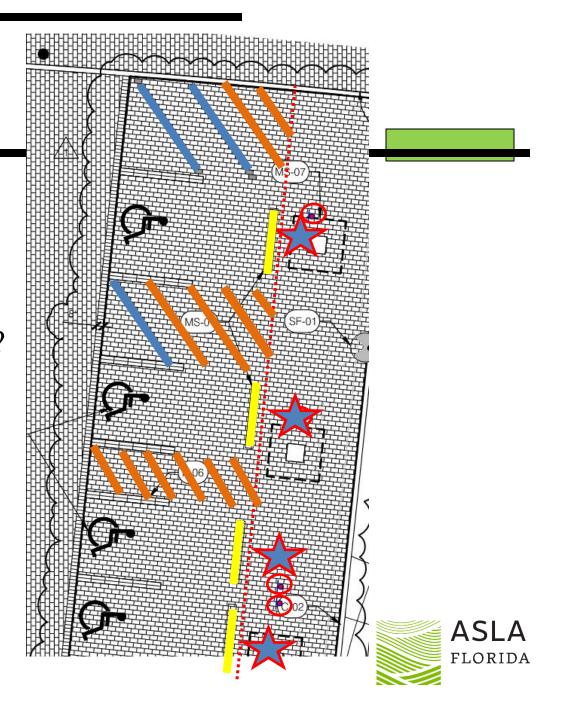






Example

- Where do the signs go?
- ◆ Is more striping needed for the aisle?



Accessibility Standards for Recreation Facilities

- ◆ ADA standards specifically address:
 - recreational boating facilities
 - o fishing piers and platforms
 - golf facilities
 - miniature golf facilities
 - o play areas
 - public swimming pools, wading pools and spas
 - o amusement rides
 - o other recreational facilities
- ◆ But are access requirements limited to these facilities?





Recreational Boating Facilities Boat Slips

- ◆ Number of total slips based on average 1 slip per 40' of dock edge if not defined
- ◆ Min. 1 accessible slip for up to 25 total slips provided, 3 for 100 slips provided, etc.
- Disperse among different types of slips



Dispersion is a common theme in the ADA Standards.



Recreational Boating Facilities Boat Slip Piers

- ♦ 60-in. clear width on pier
- ◆ 36-in. clear width permitted with limitations in specific instances
- ◆ Edge protection not required





Recreational Boating Facilities

Boarding Piers at Boat Launch Ramps

- ◆ No less than one boarding pier must be accessible
- ◆ Refer to detailed gangway criteria







Recreational Boating Facilities

Boarding Piers at Boat Launch Ramps

- Accessible parking requirements apply
- What other vehicles should be considered for specialized accessible parking?
 - o RV's
 - camping trailers

Which are exempt?

- trucks
- buses
- delivery vehicles





Fishing Piers & Platforms

- Specifically designed and constructed for fishing
- Clear seating and turning space
- ◆ Railings not required
- ◆ Where railings are used:
 - provide max. 34" height for 25% of railing
 - well dispersed
 - o 12" extension beyond inner face of railing, OR2" high min. edge protection





Golf Facilities

Accessible Elements

- ◆ Accessible route required to connect...
 - o bag drop
 - o cart rental area
- ◆ ...and onto...
 - o teeing grounds
 - o putting greens
 - o weather shelters
- ...and onto at least 5%but no fewer than one of...
 - o practice putting greens
 - o driving range stations



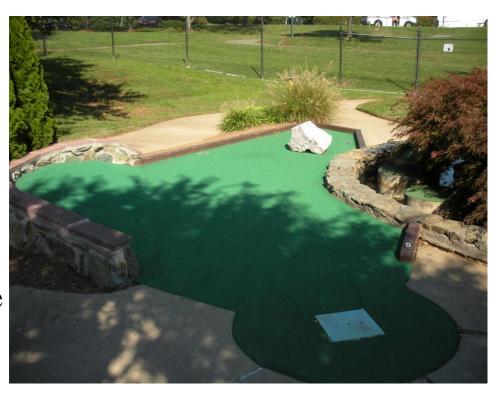


Miniature Golf Facilities

General Course Considerations

- ◆ 50% holes accessible
- ◆ Accessible holes either consecutive, or with one break in sequence
- ◆ If break in sequence, 18th hole must be accessible
- ◆ If consecutive, last accessible hole must have accessible route to entrance or exit without traveling through another hole

Who here has designed an accessible miniature golf course?





Accessible Route and Ground Surfacing

◆ Accessibility to, into and within the play area







Essential Concepts

◆ Scoping, quantities and access to ground level and elevated components treated separately







Essential Concepts

- ◆ Elevated component access
 - transfer system
 - o ramp

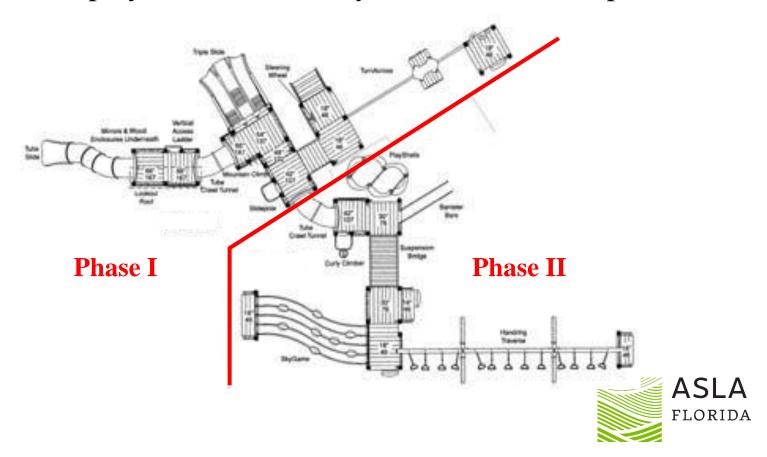






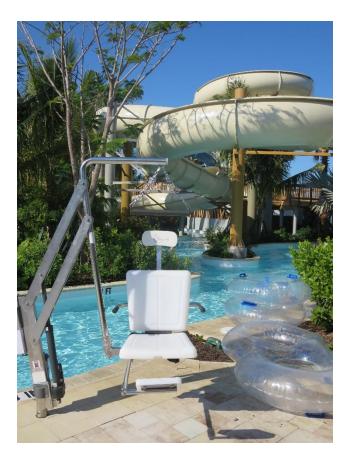
Phased Construction

◆ Must meet play area accessibility standards in each phase



Access – Primary

- ◆ Two accessible means of entry unless:
 - o < 300 l.f. perimeter pool wall
 - o specialty pool
- ◆ One of which must be either:
 - 1. Lift
 - o used in less than 48-in. water depth, OR...





Access – Primary

2. Sloped entry

- o to 24" min. 30" max. water depth
- o 33 38" width between handrails
- o no handrail extension required at bottom

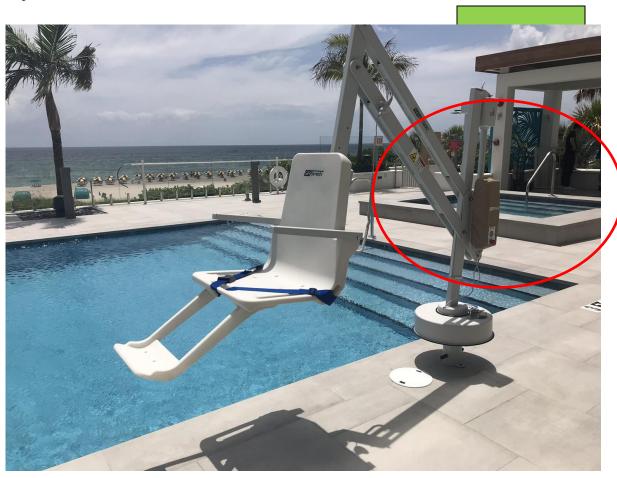




Access – Primary

- ◆ Public Pools,
- ◆ Club Pools
- Private Pools serving more than a single family

PERMANENT



What's missing on this high-end new condo?



Access – Secondary

- ◆ Secondary means of entry may include:
 - 3. Transfer wall
 - 4. Transfer system
 - 5. Stairs
 - o 20 24" width between handrails (no extensions required)





Spas Access

- ◆ One entry required
- ◆ Permitted entry systems
 - o transfer wall
 - o transfer system
 - o lift







Other Recreation Facilities

Accessibility Required

◆ Field sports



◆ Court sports



How is this different than playground access requirement?



Other Recreation Facilities

Accessibility Required

- ◆ Team or player, and spectator seating areas
- ◆ Florida requires accessibility to all recreation facilities. If not specifically noted, plan on minimum of one and up to 5% of quantity provided.





ABA Standards

Outdoor Developed Areas

- ◆ The Architectural Barriers Act (ABA) Accessibility Standards apply to most federal facilities and mirror the ADA Accessibility Standards. They include standards for "Outdoor Developed Areas"
- ◆ These standards represent "state-of-the-art" guidelines for accessible design under the ADA





Outdoor Developed Areas Scope

- ◆ Standards affecting only federal lands
- ◆ Guidelines, "Best Practices," when used elsewhere
- **◆** Facilities
 - o trails
 - o beach access routes
 - o picnicking
 - o camping
 - o viewing areas





Outdoor Developed Areas

Scope (Guidelines)

- Outdoor constructed features at facilities
 - o picnic tables
 - o fire rings and fireplaces
 - grills and wood stoves
 - o trash and recycling containers
 - o water spigots
 - o utilities
 - o rinsing showers
 - o benches
 - o telescopes and periscopes





Trails (Guidelines)

- ◆ Trails are "pedestrian" routes for outdoor recreation purpose
- ◆ Trailhead sign that describes trail characteristics
- ◆ Firm and stable surface
- ◆ Standards differ among paved, wood decking and other surfaces



What characteristic is missing from the accessible route standard?



Beach Access Routes (Guidelines)

- ◆ One accessible route per ½ mile of new beach access development
- ◆ Extend to high tide (MHW)
- ◆ Permanent or removable
- ◆ Firm and stable
- ♦ 60" min. width
- ◆ Dune crossovers require handrails and edge protection



What is the most often overlooked requirement to achieve full compliance?



Picnic Tables (Guidelines)

- ◆ 20% but no fewer than 2 tables, if more than 2 are provided
- ◆ Accessible and on an accessible route
- **◆** Dimensional clearances







Grills and Trash Containers (Guidelines)

- ◆ 20% but no fewer than 2, if more than 2 are provided
- ◆ Cooking surface 15 – 34" off ground surface
- ♦ 48" x 48" on all useable sides





Benches (Guidelines)

- ◆ 20% but no fewer than 2, if more than 2 are provided
- ◆ 36" x 48" clear space at end





PROWAG

Public Right of Way Accessibility Guidelines

◆ In 2011, the Access Board issued proposed "Accessibility Guidelines for Pedestrian Facilities in the Public Right of Way"







PROWAG

Public Right of Way Accessibility Guidelines

◆ In 2013 the proposal was expanded to include Shared Use Paths







PROWAG

Public Right of Way Accessibility Guidelines

◆ Federal Highway Administration FHWA



◆ Florida Department of Transportation FDOT

- o if you use a guideline then it becomes your standard (from a regulatory side).
- o adapted some at Florida level. 2016 Green Book

Guidelines - not Standards... where ADA Standards don't address an issue



Curb Ramps

◆ Truncated Domes

- o 24" minimum depth
- whole width of the ramp
- contrasting color
- set along curb line or perpendicular to path of travel/crosswalk.





Curb Ramps













Audible Pedestrian Signal



◆ Sight Impaired

- set parallel to crosswalk/perpendicular to roadway
- button with raised arrow



General Accessibility Issues

◆ Full sight impaired

- use the raised curb to understand where they are
- hear traffic
- concern with protruding elements

◆ Sight impaired

- contrast very important (truncated domes & crosswalk delineation
- audible crossing signal
- concern with protruding elements

◆ Physical mobility issues

- even 2% cross slope is difficult
- width and clearance imperatives
- o Don't like truncated domes



Pedestrian Accessible Route

- ◆ Sidewalks on the side of a roadway <u>may</u> follow the slope of the roadway, even if exceeding 1:20 if there is no room within the ROW to resolve it.
- ◆ Pedestrian Access Route (PAR) Widths
 - o 3' wide wheelchair
 - o 3.5' for crutches
 - o 4' for user with assistance.
 - o 6' for two wheelchairs side by side
 - 5' turning radii
 - o 5' two people side by side



Ownership/Liability

Federal State Local

◆ Public sector required to have a 'Transition Plan' – to bring all pedestrian facilities up to accessibility standards.

Is a town responsible for all intersection curb ramps within their boundary?



Ownership/Liability

Federal State Local

◆ Public sector required to have a 'Transition Plan' — to bring all pedestrian facilities up to accessibility standards.

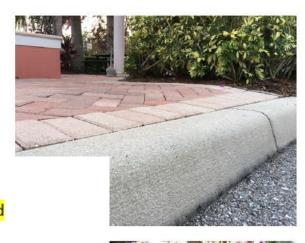
Is a town responsible for all intersection curb ramps within their boundary?

The jurisdiction who owns that section of road is responsible. A town may have all three of the above.

Compliance Reports

◆ Existing **Developments**





Common Areas:

Photo 41 and 44 - There is no accessibility to the table. One of the (2) tables is required to have ADA accessibility. Non Compliant.

- 42 Banding pavers are sloping towards curb. Safety.
- 43 Entry to building accessible. Compliant.
- 45 Crosswalk from Building 600 east toward Building 500. No issues. Compliant.
- 46 Turning area must be 5'x5' (currently only 3'x3') and is not ADA accessible. Non Compliant.
- 47 A few pavers have lifted. Repair and reset as necessary. Safety.

accessible walks from parking lot to the building are closely located to marked. The paths connecting from the sidewalks to the building on the ADA walks but are required to have signage directing to the closest AD

There are areas that may not be an ADA accessibility issue but rather the stairs in the walks leading to the sidewalks on the north side shou areas within the covered walks on the north side of both buildings the to the grade level. Soil has eroded and the drop creates a fall hazard should also be considered.



The following is a detailed account of the ADA and safety observation common areas of University Commons. The numbers below correspond to the attached site photos. Immediate issues to be addressed are highlighted.



Photo 44





