

ACCESSIBILITY STANDARDS

DESIGNING FOR ACCESSIBILITY AT
LACCD

June 12, 2024 update

UPDATE HISTORY
September 22, 2010
October 20, 2011
December 21, 2015
June 10, 2021
February 10, 2022

INTRODUCTION:

LACCD is a Public Entity and as such is obligated to meet Title II of ADA which mandates ALL programs, activities, and services provided or operated by or on behalf of LACCD be accessible; all physical facilities must be designed constructed or altered to provide the highest degree of access to individuals with disabilities.

All public and common spaces and facilities, means of egress and alarms including those within employee work areas must be accessible; areas used only by employees strictly for work must be designed and constructed so that individuals with disabilities can approach, enter, and exit those areas. Further, employment discrimination is prohibited under any service, program, or activity conducted by a public entity. See LACCD Policy Memorandum attached.

For access compliance the Americans with Disabilities Act (ADA) Title II, a civil rights law, and the California building code (CBC) are the basis of design for all construction projects; integration and equal opportunity are the goals of the ADA. All LACCD facilities must be designed with Universal Design principles in mind and provide environments with integrated accessibility. Designers and builders are required to be familiar with the ADA law and how it may affect physical facilities design and construction, and are expected to deliver compliance in their projects required by the civil rights law that may exceed the minimums building code requirements. The primary purpose for this document is to clarify expectation from the design and construction teams, and highlight lessons learned from reoccurring common challenges.

*No qualified individual with a disability shall, because a public entity's facilities are inaccessible to or unusable by individuals with disabilities, 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.**

*Each facility or part of a facility constructed by, on behalf of, or for the use of a public entity shall be designed and constructed in such manner that the facility or part of the facility is readily accessible to and usable by individuals with disabilities.**

New work not only has to be compliant in the area of the work, but it should not result in deficiencies at its surroundings, or be a hindrance to other planned work. Design and construction teams are required to perform and coordinate their work to this end.

PLAN FOR SUCCESS

Incorporating accessibility requirements into the design and construction of projects must be planned from the beginning; not be an afterthought. Project Program Criteria (PPC) must articulate the purpose of the project and accessible physical facility provisions for each program, service, activity, and specific educational curriculums intended for the project. PPC must also reflect a clear strategy for the site arrival, and or Path Of Travel (POT) obligations. Use of each space, including the intended user type, and intended use for each space whether common, individual use, instructional, and or non-instructional must all be articulated. All non-instructional employees only work station and spaces must be identified in programming and labeled on design and construction drawings.

Accessible physical environment appropriate for each type of use and or user, for each program, activity, and service shall be provided. Design and construction teams must not rely on operational solutions to solve physical deficiencies in new construction/alteration/addition projects.

APPLICABLE ACCESSIBILITY REGULATIONS:

ADA Title II regulations and CBC inform the stakeholders, design and construction teams what must be accessible by mandating all programs, activities, and services provided or operated by or on behalf of LACCD be accessible. Designers must carefully review the educational curriculum, all the programs, activities, and services intended to be offered in the project and plan accessible physical facilities to accommodate each and every one of them. Generally all spaces are required to be fully accessible, except there is limited accessibility requirements for the areas used strictly for work by employees. Machinery spaces and limited access spaces as defined by the regulation when frequented only by service personnel for maintenance, repair, or occasional monitoring of equipment are exempt from compliance.

* *Italic text from ADA Title II regulations*

As for the how, the most stringent of the ADA standards and CBC accessibility requirements and lessons learned reflected in this document must be applied during the design, and construction of new, additions to, and alteration of sites, facilities, and buildings. These will provide the technical requirements for accessibility for design and construction of the projects.

All physical facility projects at LACCD are required to comply with both the ADA, and the CBC. These are two different sets of regulations. In the case of a conflict the most stringent must be followed. Approval of design and construction documents by the Division of the State Architect (DSA) does not constitute compliance with ADA, nor alleviate the design professional's responsibility to comply with ADA requirements.

Keep in mind areas that may not fall into a specific CBC category, are not reviewed by the DSA, but are nevertheless important to potential disability civil rights. The design and construction teams are responsible for compliance with both ADA and CBC notwithstanding DSA approval.

FREQUENTLY OVERLOOKED ISSUES:

1 Construction Under Old Code Cycles

When projects are designed and approved by DSA under older code versions, they are still required to comply with ADA and its latest Standards. DSA approval does not constitute a waiver for ADA requirements.

2. Construction Tolerance Errors

Experience shows that despite the best efforts of architects, engineers and contractors, elements that are designed to the maximum or minimum of a code-allowed range often become non-compliant conditions due to construction tolerance errors. In general, do not design to the extreme ends of these allowed ranges.

Also be aware of FINISH dimensions and thickness of wall and floor materials. Pay particular attention to lavatory offsets, toilet/shower accessory mounting locations, shower clear widths, handrail extensions, and floors sloped to drain and walkway slopes.

Construction tolerances must be built into the design. There is no tolerance beyond the minimum and maximum range set by the building code. Refer to DSA IR 11B-8 for more information.

3 Site Arrival

Every new construction project must provide an accessible route, as defined by CBC, to the site arrival points (public right-of-way street or sidewalk; bus stops, parking areas, and passenger loading zones). Such routes must be continuous, unobstructed, and that can be negotiated by a person with a disability using a wheelchair, and that are also safe for and usable by persons with other disabilities.

When there are different and multiple site arrival points, all of them must be connected to the project site with an accessible route. New accessible routes to site arrival points are required to be constructed when no pedestrian route exist from site arrival points to the project site.

Parking stalls and passenger loading zones serving the project must be accessible and their access aisles connected to and part of an accessible route to the project.

All or some of these routes and facilities may fall outside of the main project boundaries, but are part of the project. Site arrival facilities and routes to the project must be included in the project drawings. If they are existing the drawings must show either the existing are compliant, or show corrective work to make them compliant. It is the responsibility of the project design team to field verify and validate compliance at these routes and the site arrival facilities within the campus. If violations are found they must be corrected as part of the project,

When new parking facilities are provided as part of the project, they must include accessible parking stalls per regulations. When existing parking facilities serve the project, accessible parking stalls shall be located on the shortest accessible route from parking to the building entrance, or when several entrances are provided, dispersed and located on the shortest accessible route to the entrances.

When parking facilities do not serve a particular building or facility, the accessible stalls shall be located on the shortest accessible route to an accessible pedestrian entrance of the parking facility.

For alteration and or addition projects, site arrival points, accessible route from site arrival points plus access compliance at specific additional interior elements, collectively called Path Of Travel (POT), as defined by CBC, is required. Construction drawings submitted to DSA must include POT drawings to either show existing is compliant, or show upgrades to achieve compliance as part of the project.

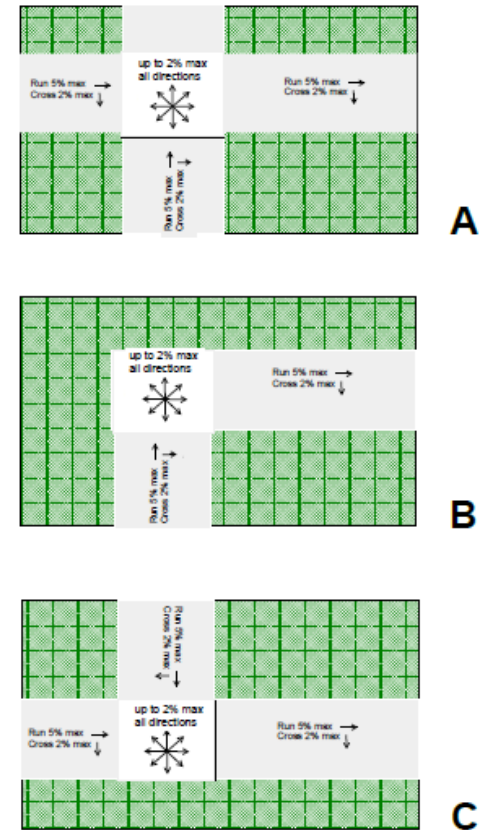
The design professional is required to follow DSA PR 15-01. Copy of this and other DSA publications related to access can be found on DSA web site <https://www.dgs.ca.gov/DSA/Publications>

4 Exterior Pedestrian Routes

Construction tolerances must be built into the work. Running and cross slopes must be within compliance range per regulations. It is recommended work not be designed, nor be constructed to the extreme ends of compliance range. When there is a change in direction along the circulation path, a level landing is required; slopes not exceeding 2% in all directions are permitted for drainage. Such areas may include but are not limited to intersection of paths, dog-legs or switch backs.

Contractors shall prepare and compact substrates under pedestrian circulation areas at optimal moisture conditions prior to placement of pavement. Be aware of soil types. It is recommended contractors check and confirm slopes for compliance once the forms are in place before pouring concrete into them. Transition new paths to existing paths flush and in a compliant manner. Provide dowel connections between old and new concrete pavements to prevent movement. Edges on concrete panels must be thickened when next to landscaping areas.

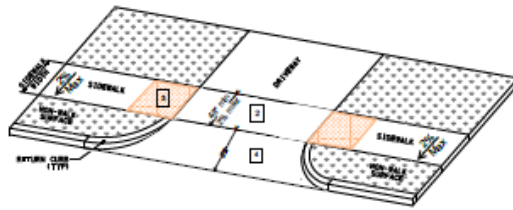
Exterior paths may not be narrower than 48" wide; edge curbs and radius edges do not count towards the 48" required width. New flat work must be compliant for its entire width and run.



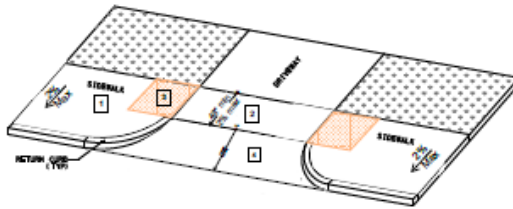
Generally except where permitted otherwise by code, circulation paths contiguous to vehicular traffic shall be physically separated from vehicular traffic with the path raised 4 inch minimum above the area where vehicular traffic occurs. Vehicular traffic includes travel through parking facilities, into and out of parking spaces, into and out of electric vehicle charging spaces, and along roadways, driveways and drive aisles.

Fire lanes are not necessarily vehicular traffic areas, except if used for other campus vehicular traffic such as delivery trucks, car traffic, etc.

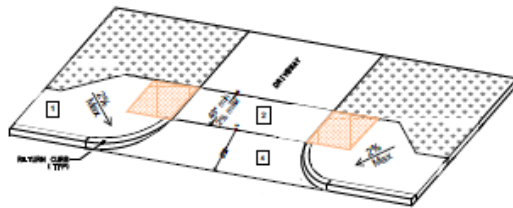
Crossings at driveways must have compliant cross and run slopes.



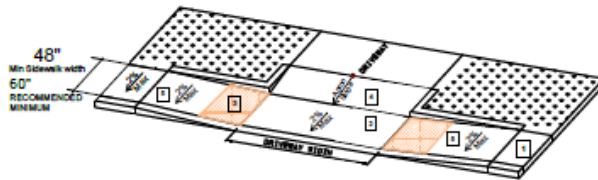
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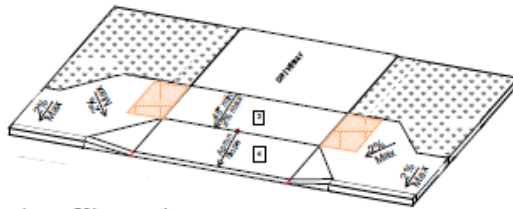
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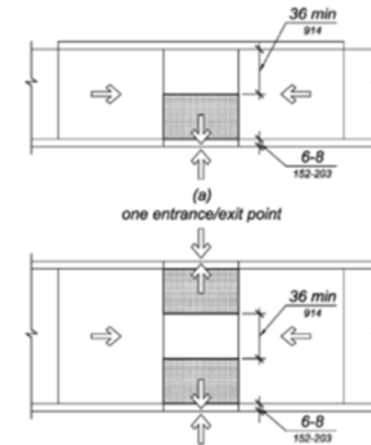


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- 1 Side walk with maximum 2% cross slope
- 2 Crossing with maximum 2% cross slope
- 3 Recessed truncated domes material
- 4 Driveway apron
- 6 Parallel curb ramp

5 Truncated Domes

Truncated domes where provided shall be fully recessed. In areas where roll-in loads, such as but not limited to fire trucks and electric cart traffic may be present concrete paver truncated dome materials shall be used. Walks and sidewalks with truncated domes parallel to direction of travel shall be minimum 6'-0" wide clear excluding the curb, to permit a minimum 3'-0" clear surface adjacent to the truncated domes for passage.



6 Curved ramps

Curved ramps, curved sloped walks, and curved curb ramps are not prohibited, but special attention should be given to avoid compound slopes. Minimum radius recommended not be less than the following:

Slope	Minimum Radius Required to Inner Side of Ramp
5.0%	30 feet
8.3%	50 feet

7. Decomposed Granite Paving (DG)

Both ADA and CBC require floor or ground surfaces in addition to being slip resistant to also be stable and firm. A stable surface is one that remains unchanged by contaminants or applied force, so that when the contaminant or force is removed, the surface returns to its original condition. A firm surface resists deformation by either indentations or particles moving on its surface. DG if untreated will not meet these requirements. Therefore, DG used in the areas that are required to be accessible must be treated with a commercial grade bonding agent to render it firm and stable.

It should be noted that chemical treatments do not last forever. The process is costly and must be repeated periodically by the college Facilities and Maintenance in order to maintain accessibility. Therefore designers must obtain buy-in and commitment from the college before specifying DG in their projects. Colored textured asphalt or concrete, or pavers may be explored as alternate cost effective paving material.

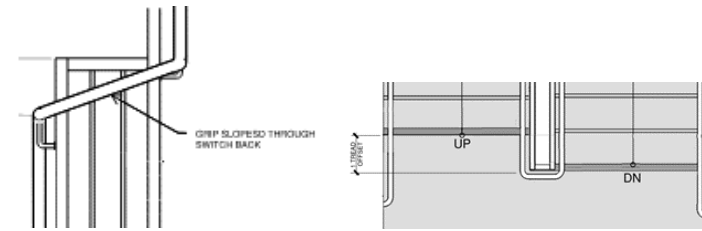
8. Stair and Ramp Handrails

Handrail extension's end radius at return to wall, or return down to floor does not count towards the required horizontal extension.

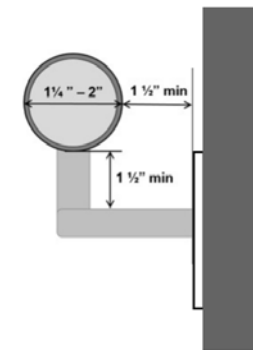
At stair and ramp switch-back or dog-leg landings abrupt vertical drops at grip should be avoided. Gripping surface shall be continuous and permit users to reach the fingers downward to grasp the handrail.

Design strategies may include but not limited to:

- Offsetting the riser at flight up a distance equal to at least one tread width behind the riser at flight down,
- Continuing the sloped grip uninterrupted through the turn without changing the pitch.
- Continuing the grip in the direction of stair into the landing for a distance equal to one tread beyond the riser up.



Avoid curved or angled support brackets that block the required clearances at grip. Handrail grip must not be closer than 1 ½" to adjacent surface.



9. Pedestrian Circulation Area Hazards

Except between a sidewalk and an adjacent street or driveway, when interior or exterior circulation paths are next to abrupt elevation change of more than 4 inches in vertical dimension between the circulation surface and adjacent surface, a warning curb minimum 6 inches above the circulation surface, or a handrail or guardrail with a guiderail centered 2 inches minimum and 4 inches maximum above the circulation surface shall be provided. Such instances may include but not limited to open sides of stairs, elevated aisles, walks, landings, mezzanines, platforms, and similar locations.

10. Platform Lifts

Inclined lifts are not permitted. Transition at sill between platform and landing must be flush. Change of level if any must comply with CBC 11B-303.2 or 11B-303.3.

11. Elevators

Hall audible and visual signals are required at every hoistway entrance. Visual signals must be visible from the hall call buttons. The visible signal elements shall be a minimum 2½ inches high by 2½ inches wide.

Hall call and car control buttons must not be smaller than ¾" diameter, must have square shoulders, and be raised ⅛ inch plus or minus 1/32 inch above the surrounding surface. The buttons shall be activated by a mechanical motion that is detectable.

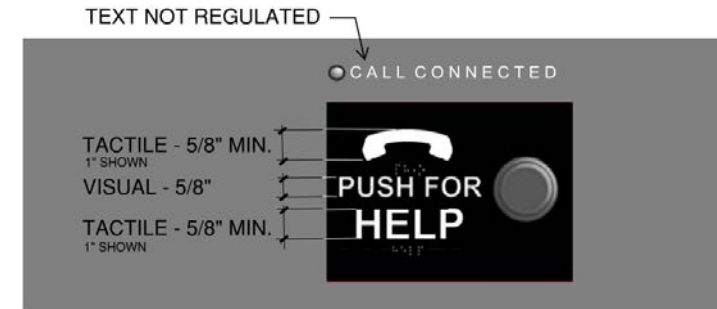
Hall call buttons must be illuminated with a white light over the entire surface of the button when pushed.

Car control buttons must be entirely within accessible reach ranges. TOP of highest button may not be higher than 48 inches above finish floor.

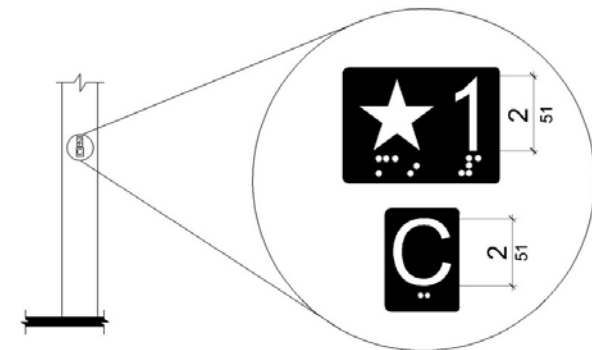
Tactile signs must be white on black background.

Signage at emergency two-way communication must be adjacent to the button that is being operated. Sign must include raised tactile letters "HELP" accompanied with corresponding Braille translation in addition to a raised horizontally oriented handset symbol also accompanied with its corresponding Braille translation. Further, any text that is providing operating instructions must meet visual text requirements per regulations. Regulated text may not be shorter than 5/8".

A labeled LED light or lighted jewel, to acknowledge that the emergency call has been received is required and is considered a component of the two-way communication, though voice communication may also be established. The visual indication must be in the same vicinity as the "HELP" push button and extinguish when a communications link is terminated.



Car identification sign if provided because it is required, or when not required but provided, must comply with CBC Sections 11B-703.2 and 11B-703.4.1, and be provided on both jambs of the hoistway immediately below the floor designation. Must have 2 inch raised characters accompanied with Braille translation, be white on black, and be non-glare.



12. Doors Gates and Hardware

All operable parts of the handles, pulls, latches, locks, card readers, push buttons, push bars, thumb-turns, lock cylinders, and other opening hardware that are on the door shall be within the 34" to 44" zone. No part or fraction of an operable part shall be above or below this zone.

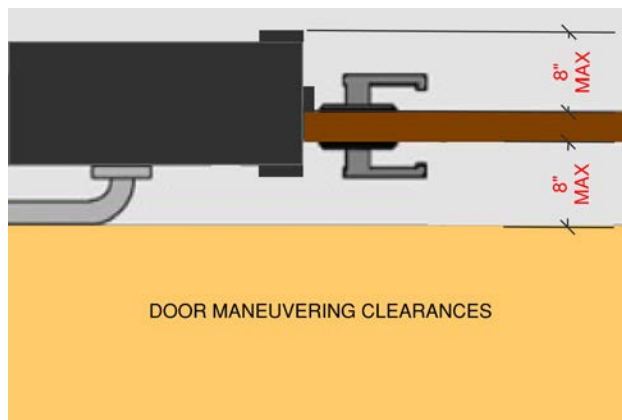
No surface mounted astragal, surface mounted door bottom, surface mounted door stop, or other surface mounted items are permitted on the bottom 10" of doors and gates on push side.

Saddle thresholds with vertical stop are not permitted. Automatic door bottoms shall be fully recessed.

Thumb-turns shall be either Schlage EZ, or ADA Rim Cylinder Thumb-turn Part Number XB13-379 at panic exit devices, or other LACCD approved equal.

Required door maneuvering clearances must be shown on plans. At exterior doors, no water from roof drains or other drains shall discharge in front of the doors in this area.

Doors may not be recessed more than 8". Elements surface mounted adjacent to the door such as fire extinguishers, surface mounted electrical boxes, Surface mounted panels, handrails, and other items could result in a recessed door condition.



13. Storage Facilities

Where storage is provided for students, or common use of staff, at least 5% but not less than one of each type in each room or area shall be accessible; on accessible route, and within accessible reach range. Types of storage include, but are not limited to, closets, cabinets, shelves, clothes rods, hooks, lockers, and drawers.

Where lockers are provided, at least 5 percent, but no less than one of each type of locker in each room or area, shall be accessible. Different types of lockers may include full-size and half-size lockers, as well as those specifically designed for storage of certain specific types of items, for example, various sports equipment, or bikes. When not all lockers are accessible, the accessible lockers shall be identified with an International Symbol of Accessibility (ISA) marker. A compliant U-shape wire pull is required at locker doors that do not pop open automatically when unlocked and unlatched. Built-in locking mechanisms shall be accessible. Knob type mechanisms shall not be used.

At kitchens, kitchenettes, and wet bars at least 50 percent of shelf space shall be within accessible reach ranges, on accessible route, and with accessible opening hardware.

14. Emergency Call Stations / Phones

Public call stations/alarm buttons, etc. designed to contact the police or sheriff in case of emergency need to be accessible to all potential users. In addition to locating such devices on accessible route, and within accessible reach range, the system shall be designated with raised characters and Braille, and provide both audible and visual signals to indicate that assistance is on the way. Signs indicating the meaning of visual signals should be provided.

15. Employee and Staff Areas

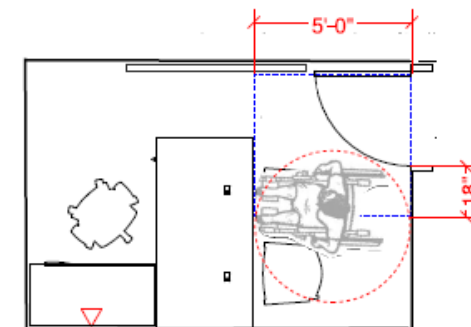
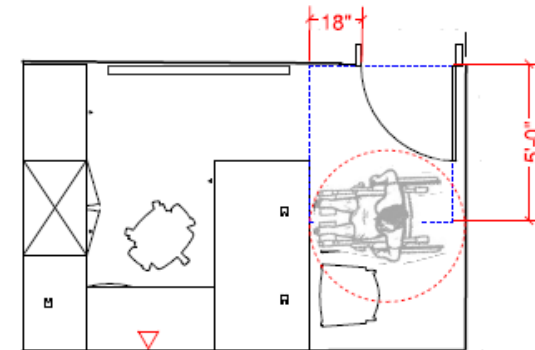
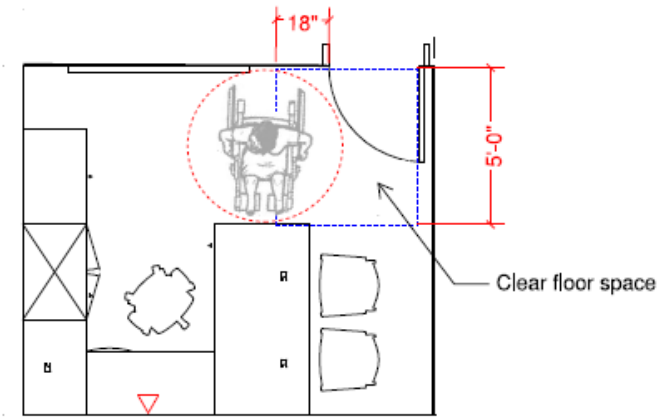
All new construction and all enhancement projects for existing campus facilities are required to be designed and constructed such that all areas of the facility (unless specifically exempted by the regulations) including all common use employee and staff areas are readily accessible to and usable by individuals with disabilities in compliance with the regulations providing the greatest degree of accessibility. In new construction, compliance in these areas may NOT be deferred under Reasonable Accommodations of ADA Title I, or California Government Code. See District policy LACCD Memorandum, dated October 30, 2012, attached

16. Private Offices

When private offices are used by individual employees strictly for work, the features of those spaces are not regulated by access codes, and there is no need for accessible features. However, when such offices are used to meet students or other members of the staff or public, they must be designed to accommodate visitors who may have a disability. This should include providing the required maneuvering clearances at doors, and appropriate FF&E layout, sizes and specifications. See diagrams on the right.

Additionally, private offices assigned to a specific individual with disability, must be designed to accommodate the specific needs of the individual, to that end all offices should be designed so that modifications could be easily made in future should there be a need to accommodate an employee with a disability.

Accessible knee and toe space shall be provided at employee side of the desk.

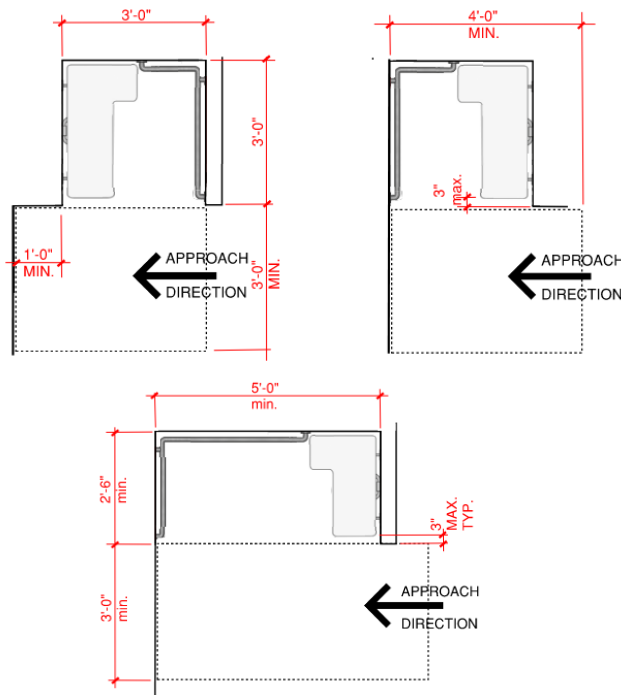


17. Showers

Whenever shower facilities are provided for staff or students there must also be a contiguous connecting accessible dressing area with a 48" long accessible dressing bench and required floor clearances per regulations, for at least 5% but not less than one shower room for each user group in each area.

Shower operating parts and controls must be entirely within the control zone. Boundaries of control zone are as defined by CBC. No part or fraction of part of any control in any position must be outside of the control zone. All controls must be operable with one hand, not require tight grasping, pinching, or twisting of the wrist, and operable with maximum 5 pounds of force. Knobs are not permitted.

Shower seat must be located on approach side of the stall, except when clear floor space extends an additional 12" minimum beyond the seat wall behind the seat. A robe hook shall be provided near stall seat at 47" AFF to top of hook.



18. Toilet and Sanitary Rooms

All single user restrooms must be identified as gender neutral facilities, and exhibit Unisex geometric symbol sign per CBC without any additional raised elements on the symbol sign. Additional unisex tactile wall identification sign shall be provided at wall adjacent to the door. Acceptable language on such sign include "ALL GENDER-RESTROOM", "UNISEX RESTROOM", "FACULTY RESTROOM" or simply "RESTROOM".

Jumbo toilet paper dispensers, or side-by-side roll dispensers shall not be used inside accessible single-user restrooms, or accessible compartments in multi-user restrooms. No dispenser shall be behind grab bars. Bottom of the dispenser outlet, not to be confused with the centerline of the roll, must not be lower than 19" from finish floor.

Sanitary disposal shall not be more than 2" away from toilet paper dispenser.

TOP of operating parts at all accessories shall not be higher than 40" above floor. Such parts may include but not limited to top of coin slot at vendors, top of openings at paper product dispensers, top of control levers, top of push buttons, motion sensors.

Touchless sensor activated dispensers, flush controls and faucets are encouraged.

When sensor activated flush controls are used, the projecting trim at the wall mounted sensor shall not be located in the required clear wall area around grab bars. The required clear wall area starts 1 1/2" below the bar and extends to 12" above the bar.

19. Touch Screen Technology

When interactive touch screens are provided for occupants use, to provide information about the facility, for example way-finding, or to operate elements of the facility such as locks, light, window shades, etc., the requirements of Program Access and architectural provisions related to them must be met, therefore an alternate mode of operation and or information retrieval that does not require user vision and affords persons with disabilities the same access, the same convenience, and the same confidentiality shall be provided.

Where a product utilizes touchscreens or contact-sensitive controls a tactilely discernible input method shall be provided at the same time, in the same location, and for the same type of independent operation as the touch screens. For example, newer ATMs and touch screen kiosks used for check-in at Amtrak stations are also equipped with Braille and headsets to assist passengers unable to use touch screens. Please refer to the latest edition of LACCD Audio Visual Standards for more information.

20. Protrusions

Be mindful of protrusions over circulation paths; avoid or protect protrusions extending beyond 4" from face of walls. Provide either alcoves, or provide cane detection elements directly below the protrusion. Protrusions may include but not limited to walls with less than 90 degree angle between the floor plane at circulation path and the wall surface, surface mounted sinks, surface mounted toilet accessories, shelving, drinking fountains, cantilevered counters, wall phones, sprinkler riser valves and pipes in stairways, surface mounted flat screens, and surface mounted fire extinguisher cabinets or extinguishers, etc.

Install bottom of surface mounted fire extinguishers, or surface mounted fire extinguisher cabinets at 26" above finish floor (AFF)

21. Reach Ranges

Elements required to be accessible must be within accessible reach ranges. When reach is un-obstructed the highest end of accessible reach range is 48" AFF, and the lowest end is 15" AFF. Top of shelves shall not be higher than 44" AFF. Top of fire extinguisher cabinets shall not be higher than 48" AFF. Top of wall mounted phone devices shall not be higher than 48" AFF. Top of manual fire alarm pull devices shall not be higher than 48" AFF. Manual control chains for window shade coverings intended for occupant use must extend down to at least 36" AFF and be on accessible route within accessible reach ranges. Top of thermostats intended for occupant control shall not be higher than 48" AFF.

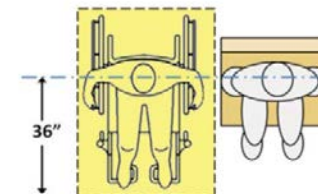
When deep counters and work-surfaces are provided, counter mounted pedestals shall be provided for power and network connections within accessible reach ranges where such connections are needed.

22. Built-in counters with sink

Avoid false doors and false toe kicks when clear floor space is needed under the sink

23. Built-in Seating

When fixed seating is provided, space for integrated wheelchair seating must also be provided. When seating is linear, space for wheelchair seating must be in-line, and permit shoulder alignment when required by regulations. Such seating may include but not limited to auditoriums, bleachers, seat walls, fixed benches, and stadium style step seating.



24. Teaching Stations, Lecterns and "Smart" Classrooms

All lecterns and teaching stations must be accessible, and be on accessible route. Any built-in technology in such lecterns and teaching stations must be accessible, not only in terms of physical location, and physical attributes, but also in terms of the functions of that technology (controls, provisions for those without hearing, and or those with visual impairments, etc.). Adjustable height accessible movable lecterns and teaching stations may be provided for those having difficulty seating behind a desk, or for instructing in standing position.

Draped cables and extension cords are not permitted to run across floor at circulation paths.

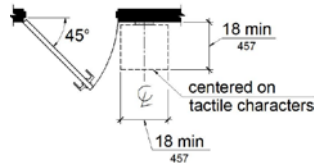
25. Signage

All new signs must comply with the current regulations. Signs in each college must also conform to aesthetic requirements specific to each college. Visible screws are not permitted at tactile signs.

Signs shall be long lasting and vandal resistant. Tactile characters and Braille must be integral to sign plaque. Applied/adhered characters are not acceptable.

Exterior signs must be of material that can withstand exposure to sun, weather and atmospheric elements. They shall not rust, fade, warp, or peel off. Tactile letters must not fall off, or deteriorate.

Minimum 18" x 18" clear floor space shall be provided in front of all tactile signs centered on the sign and connected to an accessible route. When such sign is mounted on the wall on the swing side of the door, the arc of any door swing shall not swing into the required clear floor space.



Signs characters must contrast as much as possible with their background. Shadows on the back surface, cast by characters on the front surface of sign panels, and surface glare are not acceptable. Text characters must be kerned for uniform appearance.

Tactile characters and symbols must not be abrasive to touch.

SPECIAL USE FACILITIES

New facilities for special educational purpose must be designed constructed or altered to provide the highest degree of access to individuals with disabilities, and to enable LACCD meet their obligations for Program Access under Title II of ADA. All facilities must be designed constructed and or altered to that end.

Program Access for a new facility means equally effective opportunity for the disabled individuals to participate in all curriculum, activities, benefits, and services offered or intended to be offered in that facility.

The absence of individuals with disabilities in the student or employee population intended to use the facility cannot be used as the test of whether the design and or construction of the project must be accessible.

To avoid misinterpretation by the project stakeholders all rooms and spaces must be identified on the design and construction plans to clarify use, and user group types.

There are many different types of special use facilities. All facility types must be designed with Universal Access principles in mind meaning Facilities must be accessible and useable by all people and accessibility must be integrated to the maximum extent possible.

All emergency alarm controls, lighting controls and HVAC controls intended for occupants use, and all eyewash/shower stations shall be accessible in all types of facilities. Accessible route shall be provided in all types of facilities in each room or space to connect all accessible elements within the room or space and be part of the accessible route to the instructor's desk and or office, to the support elements and areas, and to the facility entrance and egress.

Spaces and equipment will be different for each type of facility, but the accessibility requirement concepts will be the same. Here are a few specific examples:

▪ Laboratories

In each room or area, if not all at least 5% but never less than one of each different type of work-bench, and each different type of counter, for each different use shall be accessible with required knee space and controls within accessible reach ranges.

In each room or area, If not all at least 5% but never less than one of each different type of fixture, and each different type of equipment in each lab shall be accessible to and usable by persons with disabilities on accessible route.

When support elements such as fume hoods, sinks, auxiliary work counters, marker boards, tack boards, peg boards, and hooks are provided within the room, at least 5% but less than one of each for each different type of use must be accessible and on accessible route, located in or near the same area as accessible work bench.

Accessible fume hoods shall have clear knee space minimum 27" high by 30" wide by 19" deep. All operable parts of accessible fume hoods shall be entirely within accessible reach ranges. Controls shall be lever type operable with one hand with maximum 5 lbs. of force.

All fume hoods whether accessible or not, shall not project more than 4" beyond the lower cabinet below over circulation paths.

Accessible eye-wash equipment with required knee space shall be provided. Projecting units shall be within alcoves. Clear knee space shall be provided under the bowl per code.

Emergency Shower activation pull shall not be higher than 47" AFF.

Controls for equipment required to be accessible and intended to be placed on top of counters shall be within accessible reach ranges. Counter heights may have to be lowered to achieve compliance. Design professionals are required to coordinate counter heights to achieve compliance. One size may not fit all.

Equipment that are floor mounted shall be on accessible route. Their controls shall be within accessible reach ranges. Clear floor space as defined by code connected to accessible route shall be provided next to the controls.

▪ **Instructional Culinary Facilities**

Culinary school buildings are intended for student learning activities and use and must be designed and constructed for maximum accessibility. Spaces with intended user groups other than students must be identified on programming, design and construction plans. If no identification is provided the space shall be viewed as student learning space and is required to be fully accessible. Last minute room name change pronouncements by construction crew to circumvent compliance will not be acceptable.

Culinary Kitchens and Kitchen-Lab rooms, classrooms intended for student use, and attendant sides of retail areas staffed by students shall be fully accessible.

If not all, at least 5% but never less than one of each type of work-bench for each specific type of function; 5% but never less than one of each type of auxiliary counter minimum 60" long; 5% but never less than one of each type of support fixture, and 5% but never less than one of each type of equipment in each Kitchen, Kitchen-Lab room, or each space for each type of specific use must be accessible to and usable by persons with disabilities on accessible route, and within accessible reach ranges.

Support elements such as accessible hand-sinks, and eye-wash sink, etc. shall be located in or near the same area as accessible work bench.

When provided, if not all at least 5% but never less than one cooking range; 5% but never less than one cooking surface and grill; 5% but never less than one of each type of oven; 5% but never less than one of each type of specialty oven; 5% but never less than one dish-sink in each kitchen or Kitchen-Lab, or space shall be accessible and on accessible route.

When work surfaces such as but not limited to counters, cooking ranges, grills, etc. are located on a base, the base height must be adjusted so the top of the work surface are not higher than 34" above finish floor. Design professionals are required to coordinate base heights to achieve compliance. One size may not fit all.

In each kitchen or kitchen-lab controls for preferably all , but at least 5% of each type of equipment that is either placed on a counter or on floor or on caster base must be within accessible reach ranges. That means the counter, the base legs and caster base height have to be specified at a height to enable compliance.

Induction cook tops do not offer the same experience as gas cook tops, they should not be considered and will not be acceptable as equivalent facilitation for a gas cooktop.

Kitchen designers to specify equipment with accessible controls to the maximum extent possible. Knob controls requiring tight grasping, pinching, or twisting of the wrist, and any control that requires more than 5 lbs. of force to operate should be avoided.

Kitchen designers and contractors must plan and construct walk-in refrigerators and freezers doors with vision panel to have the bottom of viewing glass not higher than 42" above finish floor. Additionally a lever handle for emergency egress shall be provided inside the walk-in freezers, and refrigerators within 34" to 44" AFF range. Obscuring the vision panel as a tactic to circumvent compliance is not acceptable.

Floor gratings shall have openings that do not allow passage of a sphere more than ½ inch diameter. Elongated floor grates when within circulation paths shall be oriented with the long direction of opening perpendicular to direction of circulation.

When there are multiple circulation directions, grating with round or square openings that do not allow passage of a sphere more than ½ inch diameter shall be used. Grates with larger opening required in front of ice machines must be located outside of the main circulation paths preferably in alcoves.

Demonstration counters must be accessible in their entirety. Top of counter along its entire length shall not be higher than 34" above floor. Be aware of floor flatness and slopes.

All aisles within all rooms required to be accessible must be accessible. Projecting valves, pipes, handles, shelves etc. shall not reduce the required aisle clearances. Kitchen designers to carefully consider overall dimensions of each piece of equipment that abuts an aisle and design aisle widths that can accommodate them.

All retail, service, checkout areas and counters must be accessible both on customer side and on staff side. At least 5% of cashier stations but never less than one cashier station must be accessible on attendant side. Accessible counter heights must be maintained for the entire counter length. Be aware of floor flatness and slopes. Counters must not protrude over circulation paths by more than 4". Be aware of deep cantilevered counters; design and construct counters to achieve compliance.

▪ Libraries

General and staff common use areas card files, book stacks, periodicals, reading and study areas, reference areas, information desks, circulation counters, reserve areas, special facilities or collections, etc. shall be made accessible to persons with disabilities.

Open Book Stacks: Open book stacks shall be on an accessible route, and shall have aisles in compliance with CBC. The clear width for aisles shall be 36 inches minimum if serving elements on only one side, and 44 inches minimum if serving elements on both sides. Dead end aisles shall not be greater than 20 feet long.

Rows of Bookshelves: Rows of bookshelves with minimum clearances between them do not necessarily account for books that are deeper than the shelves and will protrude into the clear aisle width. Designers must coordinate with college Librarians to get an understanding of the different types and sizes of book collections.

Consider and incorporate clearances and accessible route to accommodate these conditions.

This means aisles may need to be designed slightly wider than the absolute minimum permitted by code.

Height of Book Shelves and Magazine Racks: Unless an attendant is readily available to assist persons with disabilities during all open hours, all shelving and racks intended to hold items for public use shall be located within accessible reach ranges. Highest self-serve shelf not more than 48" above the floor. Note that this is more stringent than the 54" height provided under CBC 11B-225.2.3.

Reading and Study Areas: Preferably all, but at least 5% but not less than minimum of one of each type of element for each type use in each different area such as but not limited to tables, study carrels, work counters, desks, computer stations or similar workstations must be accessible.

Check-out Areas: At least one lane at each check out area shall be on an accessible route and shall have accessible checkout counter maximum of 34" above the finished floor with a minimum 36" wide aisle on the customer side. When only one of multiple aisles is accessible, that aisle must be identified with an International Symbol

of Accessibility (ISA) sign. The attendant's side of at least one check-out aisle in each area shall be accessible.

Security barriers: Security barriers, including but not limited to, security bollards and security check points, shall not obstruct a required accessible route or accessible means of egress.

Depositories, change machines, copy/print areas: Where provided, preferably all, but at least one of each type of depository, vending machine, change machine and copy/print areas shall be accessible, on accessible route, and with accessible controls.

Private study rooms and meeting rooms: Where provided shall be accessible and accommodate wheelchair seating. When amenities such as marker boards, and other occupant controls, etc. are provided in the room they must be on accessible route and installed within accessible reach ranges to be useful.

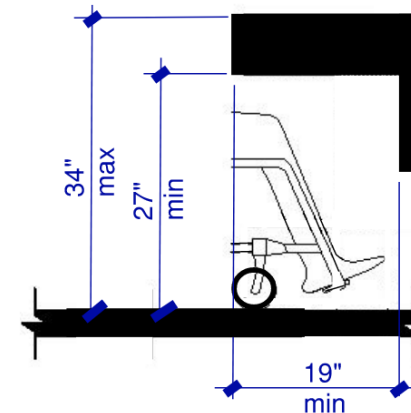
FURNITURE FIXTURES & EQUIPMENT (FF&E)

Although there are no specific technical requirements for loose furniture, furnishings and equipment, they are means by which colleges make their programs accessible to individuals with disabilities. Designers must apply CBC and ADA accessibility standards for fixed elements to analogous free-standing loose FF&E.

CBC does not provide specific requirements as to how a building should be furnished. There are, however, several sections that cite specific requirements for accessible reach ranges, bench heights, work counter heights and lengths, knee clearances, maneuvering spaces, clearances around doors, around obstacles, at work tops, at operable parts, and at aisles. These requirements should be considered and incorporated into the specification and placement of FFE for the projects.

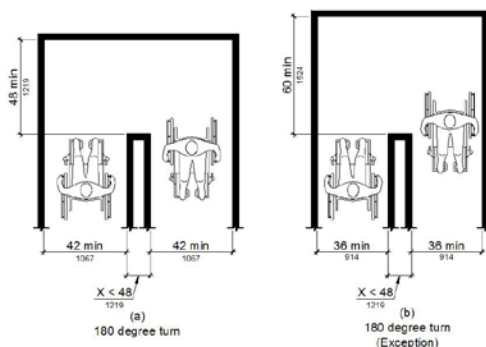
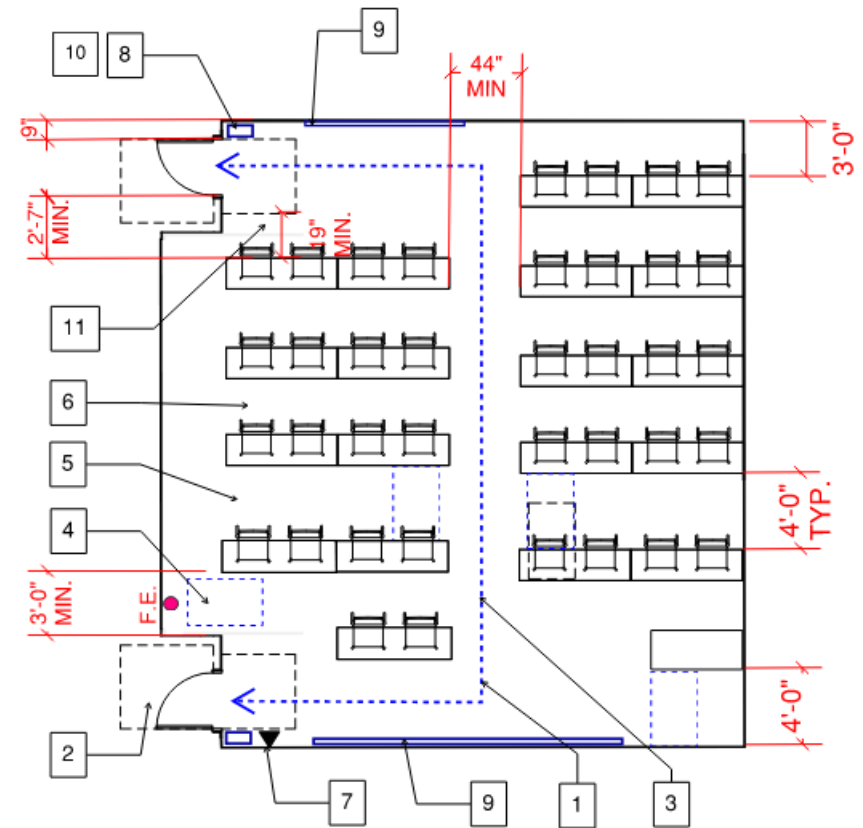
Thoughtful design and coordination during the design process with architectural, electrical, mechanical/plumbing control locations, security device placement, and audio-visual requirements is required to help alleviate potential problems. Frequently overlooked issues:

- Minimum 5% but not less than one for each type of fixture and or equipment in each different room or area must be accessible, be on accessible route, and have accessible controls and operating parts within accessible reach ranges. Required clearance must be shown and sizes specified on plans. If such equipment is placed above counters, the counter heights must enable controls for the equipment placed on it within accessible reach ranges. In many cases counter tops need to be lower than typical 34" AFF.
- Integrated accessible wheelchair seating opportunities must be planned for different seating types and areas. Top of seat for at least 5% of chair and or bench seating in each different room or area shall be between 17" to 19" AFF.
- Specify tables that provide knee and toe clearances required for access, allow for required floor clearances at doors, aisles, and accessible seating locations. Side table tops shall not be lower than 15" above finish floor.
- Accessible desks, tables, and work counters must have vertical clearance minimum of 27" high, 30" wide and 19" deep at knee space. Table legs, structural support elements under tables and counters may not be within this space. Top of desks, tables, and work counters for adults shall be within 28" to 34" AFF.

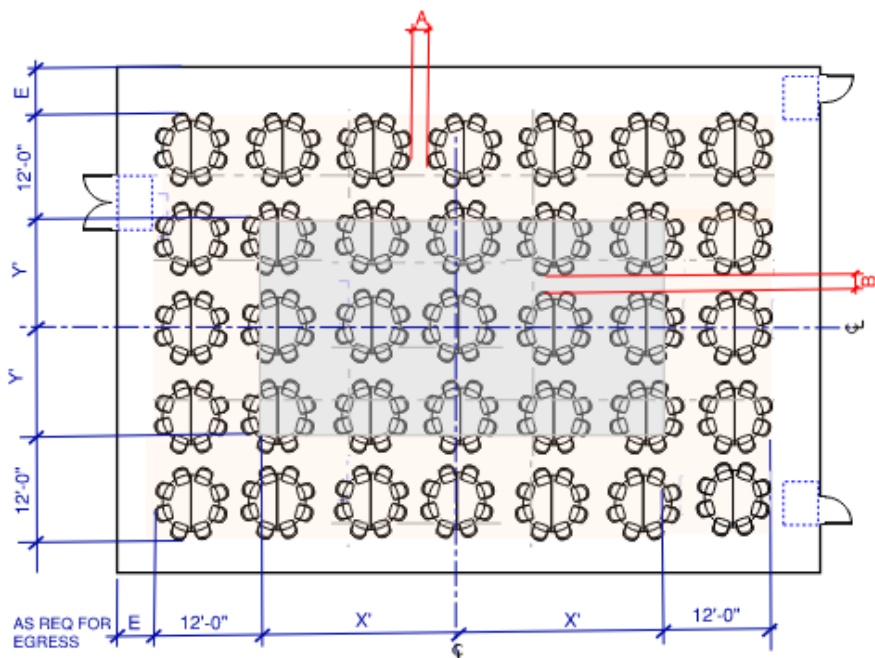
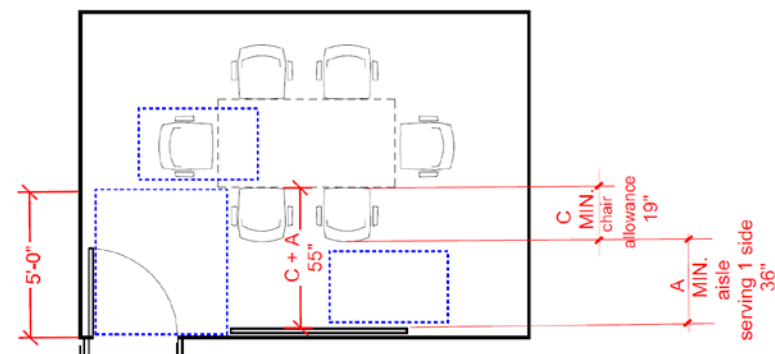
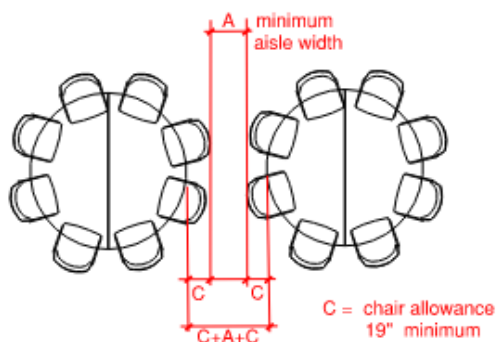


Seating at table or counter

- o Locate at least 5% of each different types of wall mounted writing boards, tack boards, coat hooks, and other elements in each room or different use area on accessible route with useful area of the boards positioned within accessible reach ranges. Bottom of writing or tack surface and top of board trays when provided, whichever is higher, must not be higher than 34 inches above finish floor.
- o FF&E must not block or overlap the required aisles and other code required clearances. Do not block tactile signs, or the minimum required 18" X 18" clear floor space immediately in front of such signs, or required clearances at doors. Do not plan trash cans or other items within the required clearances at doors.
- o In classrooms maintain clearances at main aisles and seat aisles. Rooms that require two exits must have an accessible aisle connecting the required exits to the accessible elements within the room. Refer to CBC requirements for aisles. Rows with wheelchair seating shall not be less than 4'-0" wide. Instructor desk must be accessible and on accessible route.
- o Provide not less than the minimum aisle clearances required by code. Generally 36" clear width required if serving only one side and not less than 44" clear width continuously, when the aisle serves both sides. Wider aisles may be required based on egress width requirements. Allow additional space for adjacent loose elements so they not be inside the required aisle clearance.
- o At U-turns around obstacles such as but not limited to shelving , desks, etc. provide not less than minimum code required clearances at turns per code.



- 1 When room requires 2 exits, minimum 44" clear path between exits doors.
- 2 Required floor clearances on both sides of the door
- 3 Main aisle, and aisles serving 2 sides minimum 44" wide.
- 4 Alcoves minimum 36" wide. Accessible route to room amenities.
- 5 Seating aisles with wheelchair seating minimum 4'-0" wide
- 6 Typical seating aisles 36" wide minimum for seating aisles up to 22' long. Add additional 1/2" width for each additional 1 foot, or fraction of 1' length. (Ref. CBC 1029.13.1.1)
- 7 Equipment, and devices shall be on accessible route.
- 8 Furnishings, such as trash cans shall not reduce the required floor clearances at doors.
- 9 Furnishings such as tack boards, marker board, etc. shall be on accessible route.
- 10 Furnishings and equipment shall not reduce required aisle widths.
- 11 Seats shall not reduce the required clear width for aisles, or other required floor clearances. Minimum clear width: 19" for loose seat + required aisle width or floor clearance = minimum clear width



Minimum Aisle Width Example - CBC 1029.13.1.1

1st 12'	A or B = 12"
Deeper than 12'	A = 12" + Y' (1/2") B = 12" + X' (1/2")

- Window shade coverings intended to be controlled by room occupants must have accessible controls. All such controls must be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. The force required to activate operable parts shall be 5 pounds maximum. Wands should not be used. Chains should extend well into the accessible reach range.
- In assembly areas where seating is located at a table or counter and is adjacent to an aisle or aisle access-way, the measurement of required clear width of the aisle or aisle access way shall be made to a line 19 inches away from and parallel to the edge of the table or counter. The 19-inch distance shall be measured perpendicular to the side of the table or counter
- FF&E plans must show locations of accessible elements, the required clear floor space in front of them, accessible aisles leading to them and show dimensions for the required clearances such as but not limited to aisle widths, turnarounds, etc. Plan tags must call out accessible elements.
- All Washing machines and clothes dryers shall be accessible per CBC. All to be front loaded.
- ALL mail / package boxes to be within accessible reach ranges.
- Provide adequate space for turn-around where needed. Wheelchair turning space may be achieved with either a 60" diameter clear floor space, or a T-shaped area, where each side of the tee is 36" wide and the overall length is 60".



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213-891-2490 (general phone)

October 30, 2012

Attention: CPM Directors, Relocation Project Managers (RPM), and Design Professionals

Regarding: Los Angeles Community College District
Designing for Accessibility in Employee or Staff Areas

The purpose of this memorandum is to clarify the scope of physical accessibility required within employee or staff areas as regulated by the California Building Code and Federal ADA Regulations.

Accessibility is required at all common use employee and or staff areas where work is not to be performed exclusively by the employees and or staff.

Common use employee and staff areas include but are not limited to circulation paths, faculty only restrooms, faculty lounges and lockers, faculty only parking, etc.

Background

The Americans with Disabilities Act of 1990 (ADA) Title II regulations requires *"Each facility or part of a facility constructed or altered, on behalf of, or for the use of a public entity shall be designed and constructed in such manner that the facility or part of the facility is readily accessible to and usable by individuals with disabilities, if the construction was commenced after January 26, 1992."*¹

Similarly, the purpose of the California Building Code (CBC) is *"to ensure that barrier-free design is incorporated in all buildings, facilities, site work and other improvements to which this code applies and in compliance with state law to ensure that these improvements are accessible to and usable by persons with disabilities."*² Further, *"to incorporate standards at least as restrictive as those required by the federal government for barrier-free design under (1) Title III (Public Accommodations and Commercial Facilities), Subpart D (New Construction and Alteration) and Appendix A (Americans with Disabilities Act Standards for Accessible Design) (see 28 C.F.R., Part 36), and (2) Title II (Public Entities), Section 35.151 (New Construction and Alterations) (see 28 C.F.R., Part 35) both from the Americans with Disabilities Act of 1990."*²

The requirements, set forth by the ADA and CBC, apply to all areas of the facility unless clearly exempted by the regulations, or where scoping limits the number of elements required to be accessible. These requirements apply to both temporary and permanent facilities.

¹ The Americans with Disabilities Act of 1990, 28 CFR 35.151 New construction and alterations.

² California Building Standards Commission, 2010 California Building Code, California Code of Regulations Title 24, Part 1, (Sacramento: California Building Standards Commission, 2010), Chapter 1.9.1.

² California Government Code 4454

Common use circulation paths and common use spaces and elements within employee work areas are not exempt. The common use paths, spaces, and elements shall be designed and constructed in such manner that the facility is readily accessible to and usable by individuals with disabilities.

Spaces and elements within work areas, where work is to be performed exclusively by the employee or staff, are generally exempt from the requirement of ADA Title II, and the California Building Code, but shall be designed and constructed so that individuals with disabilities can approach, enter, and exit the area. These areas are covered under Title I of ADA, and California Government Code 12926 and 11135.

Title I of the ADA and California Government Code section 12926 require an employer to provide reasonable accommodation to qualified individuals with disabilities, employees or applicants for employment, unless to do so would cause undue hardship. Under these regulations, an employer is required to remove workplace barriers that keep individuals from performing jobs they could do with some form of accommodation. An accommodation is any change in the work environment or in the way things are customarily performed which enables an individual with a disability to enjoy equal employment opportunities.

Work place barriers may be physical obstacles (such as inaccessible facilities or equipment), or they may be procedural (such as rules concerning when and how work is performed). Reasonable accommodation removes workplace barriers for individuals with disabilities.

There are a number of possible reasonable accommodations that an employer may have to provide in connection with modifications to the work environment or adjustments in how and when work is performed. These modifications include, but not limited to, making existing facilities accessible, acquiring or modifying equipment, or job restructuring, etc.

Conclusion:

All new construction and all enhancement projects for existing campus facilities are required to be designed and constructed such that all areas of the facility (unless exempted by the regulations) including all common use employee and staff areas are readily accessible to and usable by individuals with disabilities and in compliance with the regulations that provide the greatest degree of accessibility.

Corrective work for employee and staff common areas in existing buildings may not be deferred under Reasonable Accommodations of ADA Title I and or California Government Code. However, corrective work for employee and staff exclusive work areas in existing buildings, not subject to any enhancement or alteration projects under the Bond Program, may be deferred and tracked on the ADA Transition Plan under Reasonable Accommodations provisions of the referenced regulations.

If you have any questions or need additional information, please feel free to call me.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. O' Reilly".

James O' Reilly
Executive Director, Facilities Planning & Development

cc: Vice Presidents of Administration
Thomas L. Hall, Director of Facilities Planning & Development
Todd Cozolino, Director Construction Services
Daynard Tullis, Director Design Services
Frank Alaniz, LACCD FP&D Deputy Director, Inspections