

Accessibility for the Disabled

The California Code of Regulations (or CCR), Title 24, Part 2, that regulates access design and requirements for non-residential and publicly-funded multi-family buildings was first adopted in 1982. As state regulations underwent various revisions, the Federal Government prepared for and adopted two landmark access bills, the U.S. Fair Housing Amendments Act (FHAA) of 1988 and the Americans with Disabilities Act (ADA) of 1990. These federal requirements differed in many ways from established California access laws. Importantly, these Federal access acts constitute an amendment to the U.S. Civil Rights Act of 1964 and establishes that access is a civil right of individuals with disabilities and, further, that the withholding of such rights through construction of inaccessible buildings in part or in whole is a federal crime that can result in substantial civil penalties.

The basic intent of the Americans with Disabilities Act (ADA) regulations is to provide the same level of services and/or access to goods for the disabled that are available to an able bodied person. The disabled person is not to be treated as a special person or as a second class citizen. This concept applies to both the public using a facility, as well as to the employees.

Title II of the ADA covers the application of the ADA on state and local governments. Government programs, services and activities are required to be accessible to individuals with disabilities. The effective date for complying with Title II was January 26, 1992. Unlike Title III (addresses privately funded public accommodations and commercial facilities), which requires changes to the physical environment, Title II allows for alternatives in lieu of making changes to the building.

Title II allowed public entities to develop a transition plan within six months, by July 26, 1992, of the enactment of the law. The transition plan should set forth the necessary steps to make the changes. The law requires the opportunity for all interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the development of the plan.

The plan must be made available to the public for inspection. Public entities were allowed three years to complete all changes and/or elements in the transition plan from the effective compliance date of the law. The public entity was also required to complete a self-evaluation of programs, services, and activities within one year of the effective date.

Like Title III, all alterations and new construction must be accessible. However, the accessibility standards may be slightly different, as either the ADA Accessibility Guidelines (ADAAG) or the Uniform Federal Accessibility Standards (UFAS) may be used as guidelines for compliance. Although both documents are similar in format, the ADAAG includes more scoping requirements and fewer technical requirements than found in the UFAS.

Unlike Title III's requirements for public access, the Title II mandate to eliminate barriers from existing buildings is not conditioned by a financial burden test. A higher degree of compliance

is required of Title II public entities to make programs accessible to individuals who are unable to negotiate physical barriers to and use of an existing facility.

A misconception relative to the state access regulations is that local jurisdiction enforce the ADA since the state has incorporated ADA accessibility guidelines into state law. Nothing could be farther from the truth. The ADA is a very broad and wide ranging act dealing with rights of access to virtually all kinds of programs, modes of transportation and facilities beyond jurisdiction of local building departments. The U.S. Department of Justice and other federal agencies are responsible for ADA and FHAA enforcement. Local California jurisdictions enforce the Title 24 state access standards. To be compatible with the California Building Code, access regulations for non-residential buildings and publicly funded buildings are formatted as Chapter 11B.

Under Title II – Public Service of the ADA, each service, program, or activity must be operated so that, when viewed in its entirety, it is readily accessible to and usable by individuals with disabilities, unless it would result in a fundamental alteration in the nature of a service, program, or activity or in undue financial and administrative burdens. Structural changes to existing buildings may be required where other means of achieving compliance are not effective. The effective date of the law is January 26, 1992. Structural changes to existing buildings to meet the “program accessibility” requirement must be made by January 26, 1995. Public entities with 50 or more employees must have developed a “transition plan” for such changes by July 26, 1992.

While the ADA requires existing buildings to comply with accessibility standards, the CCR, Title 24 applies to new buildings and alterations to existing buildings. It states “all existing buildings and facilities, when alterations, structural repairs or additions are made to such buildings or facilities, shall comply with all provisions of Divisions 1, New Buildings, except as modified by this division. These requirements shall apply only to the area of specific alteration, structural repair or addition and shall include those areas listed below:

- (i) A primary entrance to the building or facility and the primary path of travel to the specific area of alteration, structural repair or addition.
- (ii) Sanitary facilities, drinking fountains and public telephones serving the area.

As stated above Title II of the ADA requirements state and local government buildings, facilities, services, and programs to comply with accessibility regulations. Title II allows for alternatives in lieu of making changes to the buildings.

The scope of this facility needs study does not include a detailed building assessment of the impacts of ADA and CCR Title 24 on the existing Administration Building. However, cursory observation of the Administrative building reveals that the most significant accessibility issues are access to the upper floor and non-compliant rest room facilities. If an accessibility survey has not been completed and a transition plan has not been prepared, the District is obligated by ADA to do so.

TTAD Warehouse #1 Analysis Report

Introduction & Methodology

Ward Young Architects was contracted to analyze the existing warehouse building on the Truckee Tahoe Airport property. The existing building conditions and uses have been reviewed for conformance to portions of the current California Building Codes. The analysis, while broad based, is generally focused on exiting and accessibility and does not cover all aspects of the code (incl. structural). It is assumed that when the building was constructed it complied with the applicable codes in effect at the time. Limited field observations were performed (Suite A2, D, and the Restroom).

Applicable Codes

- o 2010 California Building Code (CBC)
- o 2010 California Plumbing Code (CPC)
- o 2010 California Fire Code (CFC)

General Building Information

- o Originally constructed in mid 1970s
- o 30,000 square foot metal building
- o Current Use: Warehouse with multiple tenants
- o Non fire sprinkled
- o Fire alarm in each tenant space

Building Code Classifications

- o Occupancy group: S-1 and S-2 (Moderate Hazard and Low Hazard Storage, dependant on nature of materials being stored).
- o Construction type: VB
- o Non fire sprinkled building
- o Total occupant load: 60 per CBC Chapter 10 for exiting.

Findings

California Building Code

- o The building height at approximately 20 feet is below the allowable height of 40 feet. CBC section 504.
- o The 30,000 square foot footprint of the existing building is significantly above what would be allowed by the current code for a non fire sprinkled building of this construction type. The allowable building area per the current code would be 23,220 square feet including the allowable frontage increases. CBC section 506 & table 503.
- o The non-rated fire resistance rating at the exterior walls is acceptable for S-1 & S-2 occupancies for buildings with a fire separation distance of between 10 and 30 feet. The fire separation distance is greater than 10 feet therefore the existing building complies. CBC table 602.
- o The code allowable occupant load of the building was calculated to be 60 occupants. CBC section 1004.
- o An accessible means of egress is required from each tenant space. This requirement is not met in the existing building because the door thresholds exceed the allowable height. CBC section 1007.

- One exit is required from each tenant space based on the calculated occupant load of each space. Exit signs are not required in areas that require only one exit. CBC section 1011.1 exception #1.
- Tactile exit signs are not required in areas that require only one exit. CBC section 1011.3.1.
- Egress through intervening rooms is allowed in group S occupancies. CBC section 1014.2 exception.
- Common path of egress travel is 100 feet in group S occupancies with an occupant load of 30 or less. All tenant spaces have an occupant load less than 30. The building width is 100 feet; depending on the layout of the aisles in each tenant space the path of egress travel will exceed this 100 foot dimension. CBC section 1014.3 exception #2.
- In a group S occupancy each space is allowed to have one exit access doorway if the maximum occupant load is less than 29. Each tenant space has less than 29 occupants. CBC section 1015.1 & table 1015.1.
- CBC section 1107B.2; Accessibility requirements for factory & warehouse buildings. The following areas are to be made accessible: warehousing areas on the floor nearest grade, office areas and sanitary facilities.
- Accessibility for existing buildings is required to be improved when alterations, structural repairs, or additions are made. CBC section 1134B. The existing building does not meet current accessibility standards.

California Plumbing Code

- Based on the calculations required by the current CPC the existing building meets the minimum number of required plumbing fixtures. The occupant load factor in table A of CPC section 412 results in a total occupant load for the building of 6 (3 male & 3 female). A drinking fountain would only be required if there were more than 6 occupants. Separate toilet facilities for each sex are not required in buildings with less than 10 occupants. A unisex facility designed for use by no more than one person at a time is required and provided. However, the existing unisex restroom does not comply with current accessibility standards. CPC section 412.

California Fire Code

- It appears that the current tenant spaces with high shelving fall under the definition of High-Piled Combustible Storage in CFC section 2302. A commodity classification and quantity survey of all storage areas in the building should be performed to determine the general fire protection and life safety features, including automatic fire extinguishing system, fire detection systems, building access, smoke and heat removal and draft curtains, required by the CFC. CFC table 2306.2. This survey could change the building classification from S (Low and Moderate Hazard Storage) to H (High Hazard) occupancy.

Recommendations to bring building up to current codes

- All the entrances/exits to the tenant spaces should be made accessible. Presently the sills and thresholds at the doors do not meet the accessibility requirements. They exceed the maximum 1/2" height from threshold to floor or landing and should be reworked. A detectable warning should be added to the walking surface at the exterior of egress doors to warn of vehicular hazards in the path of travel.
- Door strike clearances shall be free and clear of obstructions for accessibility. The gas meter assembly at Suite A-2 is within the required clear zone and is not conforming to current accessibility standards.
- All offices should be made accessible per CBC chapter 11B. The trailer used as an office in Suite D does not meet this requirement due to the use of stairs.

- The sanitary facilities (Restroom) should be made accessible. The current restroom and door would need to be enlarged, plumbing fixtures made accessible, grab bars added etc.
- Exterior site features should be made accessible. Accessible parking spaces should be added and an accessible path of travel to the tenant spaces would need to be confirmed. The existing grades around the building appear to present no obstacles to providing accessible parking and path of travel.
- Accessible signage should be provided for entrances, restrooms, suite identification and parking.
- Fire department access doors, aisles and exit doors shall not be obstructed per CFC section 2305.4. Aisles should be kept clear of storage, waste material and debris.
- A fire sprinkler system should be considered for the entire building. This system would resolve the building area and exit travel distance issues.
- Gas meters should be reviewed by utility provider for adequate protection from snow loads and vehicular traffic.
- A detailed commodity classification analysis of each tenant space should be considered to determine the type and quantities of materials being stored. This is a specialized review by a fire protection consultant where the items being stored are evaluated for code conformance and hazard risk. The District may want to limit quantities of high hazard and fuel products stored in the building.

Attachments

- Annotated photos
- Floor plan diagram



PHOTOS OF TYPICAL TENANT SPACE ENTRY DOORS. NON-ACCESSIBLE DUE SILLS AND THRESHOLDS THAT DO NOT MEET THE ACCESSIBILITY REQUIREMENTS.



PHOTOS OF EXISTING NON-ACCESSIBLE RESTROOM



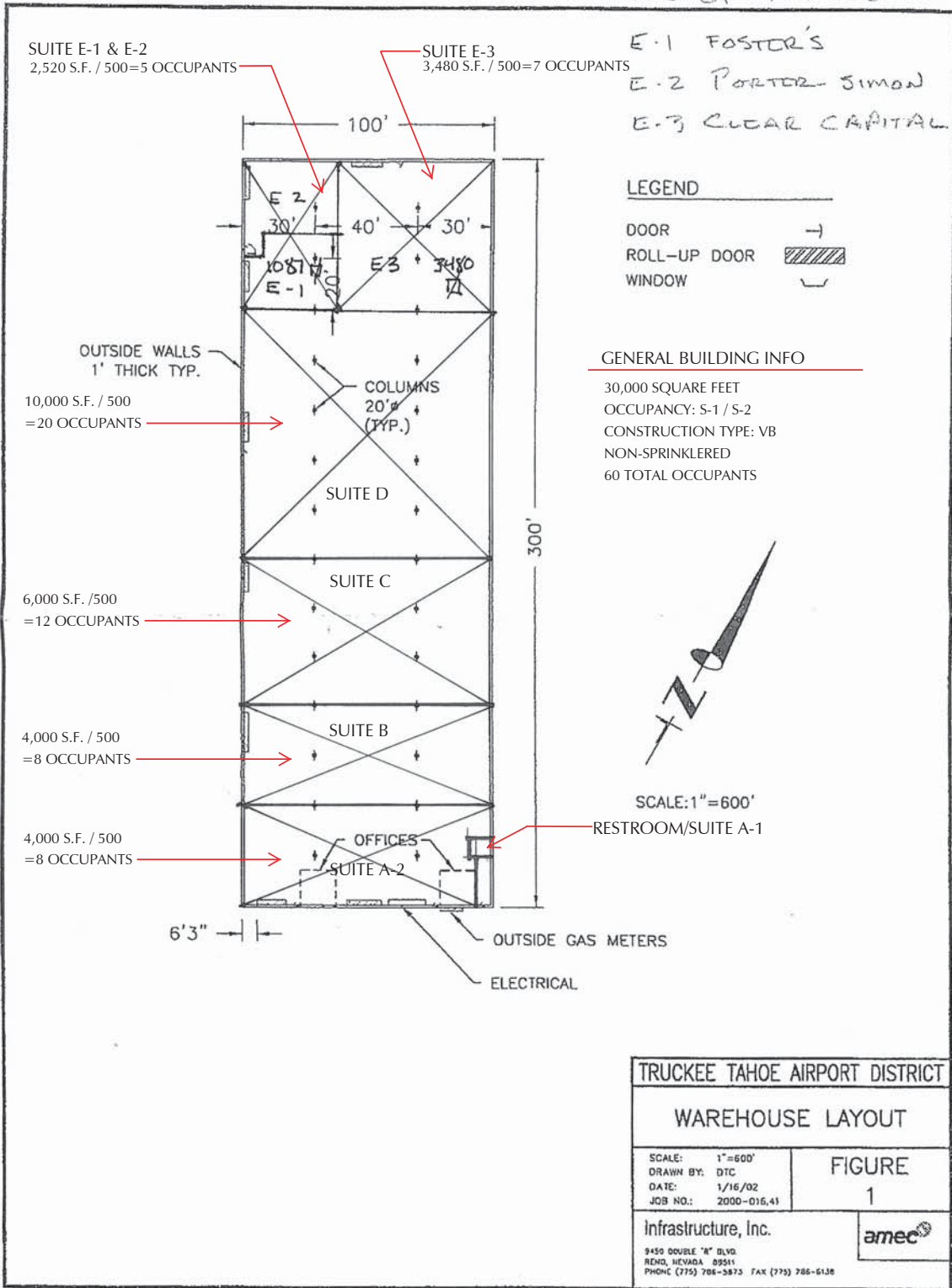
EXISTING PARKING AREA, NO DEFINED ACCESSIBLE PARKING SPACES.

AS OF 1-1-06

SUITE E-1 & E-2
2,520 S.F. / 500=5 OCCUPANTS

SUITE E-3
3,480 S.F. / 500=7 OCCUPANTS

E-1 FOSTER'S
E-2 PORTER-SIMON
E-3 CLEAR CAPITAL



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TRUCKEE TAHOE AIRPORT DISTRICT

WAREHOUSE LAYOUT

SCALE: 1"=600'
DRAWN BY: DTC
DATE: 1/16/02
JOB NO.: 2000-016.41

FIGURE
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