

PROPERTY CONDITION REPORT

CONFIDENTIAL

ADA042822XYZ

REPORT OVERVIEW

Executive Summary: The overall condition of this facility with respect to the Americans with Disabilities Act (ADA) compliance is poor. The most significant discrepancies include the toilet rooms, doors, and the location of the employee break room.

Report for: I. M. Client

Project Number: ADA042822XYZ

Inspection Address: 141 South Dugger Ave., Roberta, GA 31078. The building faces southwest.

Date/Time of Inspection: April 28, 2022, 1:00 PM – 4:00 PM

Weather: Partly cloudy, 75 F, light wind

Utilities: Electric – ON, Water - ON

Inspected By: Richard Acree, ADA Inspections Nationwide, LLC (ADAIN).

Equipment Used: Twenty four (24) inch and ten (10) inch digital inclinometers (levels), door pressure gauge, twenty five (25) foot metal tape measure, ADA gap measurement tool, and a cellular phone timer.

Others Present: Employees

Description of Tier III Survey: The consultant will conduct a full accessibility survey in compliance with the 1991 ADA Standards for Accessible Design (1991 ADA Standards) and/or the 2010 ADA Standards for Accessible Design (2010 ADA Standards), Title II for State and Local Government Facilities, Title III for Public Accommodations and Commercial Facilities, and modified protocol in ASTM E 2018-08, as applicable. If applicable, other document sources will be noted. Such survey should address each visible and measurable element and space within and without a facility, excluding systems for fire/smoke alarm, emergency light, and assistive listening. This will entail the taking of measurements and counts, unless limited by contractual agreement.

The results of the survey, shown in this Property Condition Report (PCR), will include mostly discrepancies. Elements that satisfied the ADA Standards will not be reported herein. If possible, the section of the ADA Standards that apply to a discrepancy will be identified in brackets as follows [000.0.0.0]. If applicable, other document sources will be noted. There are four (4) categories of discrepancies included in the PCR. These categories are equally applicable to state and local government facilities. The categories are separated into different groups of elements as follows.

Category 1 - Accessible exterior approach and entrance

Category 2 - Access to interior goods and services, and employee work areas

Category 3 - Access to toilet rooms

Category 4 - Access to other items such as water fountains, public telephones, fire alarms, stadium seating, elevators and lifts, egress, areas of refuge.

Within this Property Condition Report the physical condition and operational capability of individual building systems with respect to compliance with the 2010 ADA Standards may be subjectively judged as being in one of three conditions; good, fair or poor. The definitions of these conditions are as follows:

- Good – ADA compliant with the 2010 Standards. May require minor maintenance or adjustment.
- Fair – Mostly ADA compliant with the 2010 Standards. Minor maintenance or adjustment is recommended.
- Poor – Not fully ADA compliant with the 2010 Standards. Significant maintenance, adjustment or replacement is recommended.

Modifications to ASTM E 2018-01 applied by ADAIN:

The following items are modifications by ADAIN to the guidelines offered by ASTM E 2018.

1. Table X2.1 Parking (page 20), reference 2010 Standard 208.2.4, Van Parking Spaces, for every six or fraction of six parking spaces required by Standard 208.2 to comply with Standard 502, at least one shall be a van parking *space* complying with Standard 502.
2. ADAIN may exclude fire/smoke alarm, emergency lighting, and assistive listening from the survey/inspection.
3. The Building History (Discovery) questions were revised. Please see the list below.

Discovery Questions: The following discovery questions were presented to the Client. The client provided the following answers to the questions shown in bold print.

1. What year was the facility built? **1995**
2. Has the facility at the site been significantly renovated or altered since initial construction? **YES/NO**
3. If the answer to Question 2 is YES, please list the renovations or alterations. Note that normal periodic maintenance is not considered a renovation or alteration.
4. Has an ADA survey (inspection) previously been completed for this facility? **YES/NO**
5. Have any ADA improvement been made to the facility? **YES/NO** If yes, please list the improvements. **Parking lot was re-surfaced in 2012.**
6. Does the facility have a supervised fire sprinkler system serving every room? **YES/NO**
7. Does a Barrier Removal Plan exist for the facility? **YES/NO Not sure what this is.**
8. If yes, has the Barrier Removal Plan been reviewed/approved by an arms length third party such as an engineering firm, architectural firm, building department, ADA accessibility inspector, or other agency? **YES/NO**
9. Has facility ownership or facility management reported receiving any ADA related complaints, other than this complaint, that have not been resolved? **YES/NO**
10. Is any litigation pending related to ADA issues, other than this complaint? **YES/NO** If yes, please advise of the circumstances of the litigation.
11. Is there an ADA Coordinator or Administrator for this entity or facility? **YES/NO**

RESULTS OF THE ADA INSPECTION

The results of the Tier III Survey (Inspection) are as follows. Please note that not all elements were inspected due to ongoing operations. The term “accessible” will be used herein to describe an element at a site, building, facility, or portion thereof, that complies with the 1991 ADA Standards and/or 2010 ADA Standards.

Category 1 - Accessible exterior approach and entrance

Parking Lot, Walkways and Ramps:

There are two site arrival points at the facility. These include the municipal walkway and the site parking lot. The intended accessible public entrance is at the rear of the facility where an automated door is installed. See the photo on the right for the front entrance. Note that the “Now Open” sign blocks access to the front entrance, but there is no sign indicating where an accessible entrance is located.



Item 1. There is no signage at the municipal walkway directing disabled individuals to the intended public accessible rear entrance.

The photo on the left is the walkway that connects the municipal walkway along South Dugger Avenue to the accessible walkway at the facility that leads to the front entrance.

2010 ADA Standard 216.6, Entrances, states, “Where not all entrances comply with [Standard] 404, entrances complying with [Standard] 404 shall be identified by the International Symbol of Accessibility [ISA] complying with [Standard] 703.7.2.1. Directional signs complying with [Standard] 703.5 that indicate the location of the nearest entrance complying with [Standard] 404 shall be provided at entrances that do not comply with [Standard] 404.” The graphic on the right is representative of the ISA.



Advisory 216.6, Entrances, states, "Where a directional sign is required, it should be located to minimize backtracking. In some cases, this could mean locating a sign at the beginning of a route, not just at the inaccessible entrances to a building."

RECOMMENDATION: To avoid confusion and possible back-tracking from the front of the facility, place a sign at this front walkway connection shown in the photo above pointing to the accessible parking and the intended public accessible entrance at the rear of the facility. The graphic below is representative.



Item 2: The accessible municipal walkway that crosses the driveway in front of the facility has a damaged surface that has created excessive openings. See the photo on the right.



A close-up is shown on the left. 2010 ADA Standard 302.3, [Floor or Ground Surfaces] Openings, states, “Openings in floor or ground surfaces shall not allow passage of a sphere more than ½ inch (13 mm) diameter except as allowed in [Standards] 407.4.3, 409.4.3, 410.4, 810.5.3 and 810.10 [Not applicable]. Elongated openings shall be placed so that the long dimension is perpendicular to the dominant direction of travel.” This

Standard is designed to protect the front casters of a wheelchair or the point of a crutch or cane from falling into these openings.

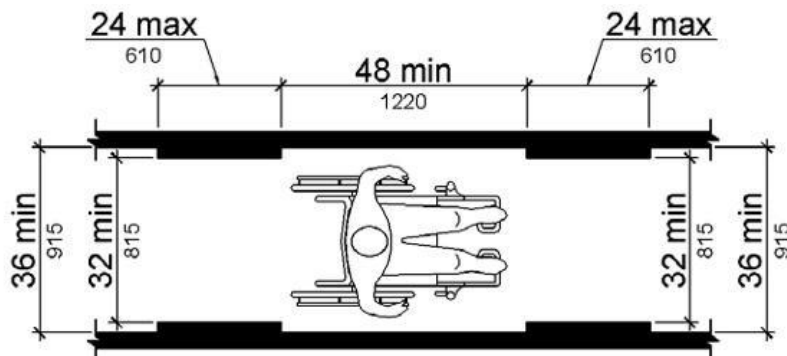
RECOMMENDATION: Contact the municipality regarding repairs to this part of the walkway to level the surface.

Item 3. One walkway from the front entrance toward the rear entrances is not 36 inches minimum in width and the walkway along the south end of the facility has excessive cross-slope. See the photo on the right.



The walkway connecting the front walkway to the south side walkway is not 36 inches in width. In some locations this walkway is 35.5 inches in width. See the photo on the left.

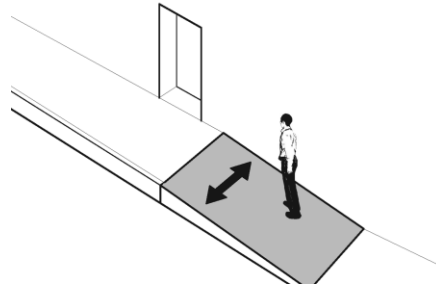
2010 ADA Standard 403.5.1, [Walking Surface] Clear Width, states, “ Except as provided in [Standards] 403.5.2 and 403.5.3, the clear width of walking surfaces shall be 36 inches (915 mm) minimum. EXCEPTION: The clear width shall be permitted to be reduced to 32 inches (815 mm) minimum for a length of 24 inches (610 mm) maximum provided that reduced width segments are separated by segments that are 48 inches (1220 mm) long minimum and 36 inches (915 mm) wide minimum.” See the graphic below for a representation of this standard.



The walkway that runs along the south side of the facility has a cross-slope greater than 5% away from the building. See the photo on the right. This is particularly significant in this location due to the immediate proximity of the vehicular way adjacent to this walkway.

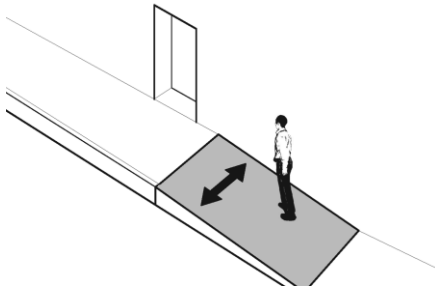


2010 ADA Standard 403.3, [Walking Surface] Slope, states, “The running slope of walking surfaces shall not be steeper than 1:20 [5%]. The cross slope of walking surfaces shall not be steeper than 1:48 [2.08%].” The graphic below is representative of cross-slope.



RECOMMENDATION: Consider increasing route widths to 36 inches, where feasible, and reducing cross-slope to 2.08% or less. This is important for daily access under normal conditions and also for emergency egress.

Item 4. The walkway across the rear of the facility and along the side of the parking lot has a cross-slope exceeding 2.08% and there are no vehicle wheel stops at the parking spaces. See the photo on the right.



2010 ADA Standard 403.3, [Walking Surface] Slope, states, "The running slope of walking surfaces shall not be steeper than 1:20 [5%]. The cross slope of walking surfaces shall not be steeper than 1:48 [2.08%]." The graphic on the left is representative of cross-slope.

2010 ADA Standard 502.7, [Parking Spaces] Relationship to Accessible Routes, states, "Parking spaces and access aisles shall be designed so that cars and vans, when parked, cannot obstruct the required clear width of adjacent accessible routes." Advisory 502.7, Relationship to Accessible Routes, states "Wheel stops are an effective way to prevent vehicle overhangs from reducing the clear width of accessible routes." The photo on the right is representative of a wheel stop.



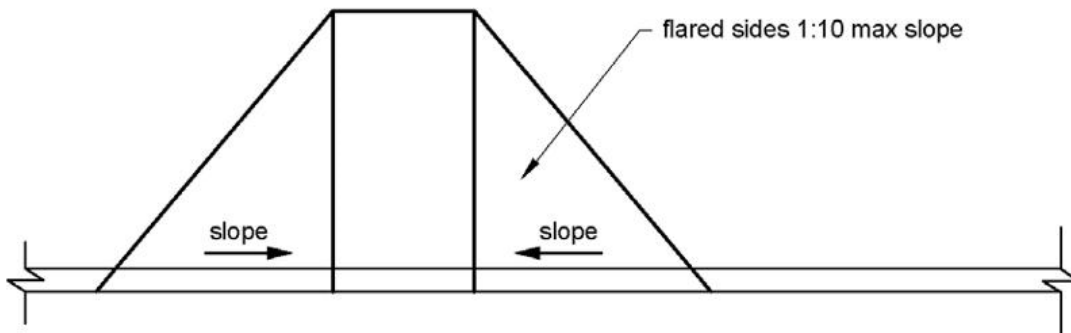
RECOMMENDATION: Consider reducing the walkway cross-slope to 2.08% or less and install wheel stops at all parking spaces along this walkway. This is important for daily access under normal conditions and also for emergency egress.

Item 5. The curb ramp for the existing ADA accessible parking space aisle has curb ramp flares that are sloped too steeply and a rough transition at the asphalt. See the photo on the right. The red arrows show the flares and the yellow arrow shows the transition.



The curb ramp flares are sloped at significantly greater than 10%. The photo on the left indicates a slope of approximately 35%. The opposite flared side was sloped at approximately 17%.

2010 ADA Standard 406.3, [Curb Ramps] Sides of Curb Ramps, states, “Where provided, curb ramp flares shall not be steeper than 1:10 [10%].” The graphic below is representative of this Standard.



The photo on the right show the transition of the curb ramp concrete to the access aisle asphalt. This transition has deteriorated significantly and now has excessive openings and uneven elevations.



The photo on the left shows a closeup of the transition.

2010 ADA Standard 406.2, [Curb Ramps] Counter Slope, states, “Counter slopes of adjoining gutters and road surfaces immediately adjacent to the curb ramp shall not be steeper than 1:20. The adjacent surfaces at transitions at curb ramps to walks, gutters, and streets shall be at the same level.”

2010 ADA Standard 302.3, [Floor or Ground Surfaces] Openings, states, “Openings in floor or ground surfaces shall not allow passage of a sphere more than ½ inch (13 mm) diameter except as allowed in [Standards] 407.4.3, 409.4.3, 410.4, 810.5.3 and 810.10 [Not applicable]. Elongated openings shall be placed so that the long dimension is perpendicular to the dominant direction of travel.” This Standard is designed to protect the front casters of a wheelchair or the point of a crutch or cane from falling into these openings.

RECOMMENDATION: If this curb ramp is to remain, the curb ramp and transition should be replaced or repaired to comply with the ADA Standards. See item 6 below for related information.

Item 6. There is only one marked ADA accessible parking space observed at the site and it is not the parking space located closest to the one public pedestrian exterior entrance. See the photo on the right.



There are approximately 28 non-ADA parking spaces and one (1) ADA accessible parking space observed behind the PSTC facility, for a total of 29 parking spaces.

2010 ADA Standard 208.2, [Parking Spaces] Minimum Number, states. "Parking spaces complying with [Standard] 502 shall be provided in accordance with Table 208.2 except as required by [Standards] 208.2.1, 208.2.2, and 208.2.3 [not applicable]. Where more than one parking facility is provided on a site, the number of accessible spaces provided on the site shall be calculated according to the number of spaces required for each parking facility." 2010 ADA Standards Table 208.2, Parking Spaces, indicates that for this site the minimum recommended number of accessible parking spaces is two (2). See the table below.

Total Number of Parking Spaces	Min. Number of Accessible Spaces
1 to 25	1
26 to 50	2
51 to 75	3
76 to 100	4
101 to 150	5
151 to 200	6
201 to 300	7
301 to 400	8
401 to 500	9
501 to 1000	2 percent of total
1001 and over	20, plus 1 for each 100, or fraction thereof, over 1000

Employees stated that the public pedestrian exterior entrance is the automated door at the rear of the facility that is second from the right when looking at the rear of the building. See the photo below for the entrance with a sign stating "Customer Entrance".



2010 ADA Standard 208.3.1, [Parking Spaces, Location] General, states, "Parking spaces complying with [Standard] 502 that serve a particular building or facility shall be located on the shortest accessible route from parking to an entrance complying with [Standard] 206.4. Where parking serves more than one accessible entrance, parking spaces complying with [Standard] 502 shall be dispersed and located on the shortest accessible route to the accessible entrances. In parking facilities that do not serve a particular building or facility, parking spaces complying with [Standard] 502 shall be located on the shortest accessible route to an accessible pedestrian entrance of the parking facility." In other words, this facility needs two ADA accessible parking spaces, one must be van-accessible, and both should be at the closest location possible to this entrance.

RECOMMENDATION: Relocate the current van-accessible parking space and access aisle to the closest space available to the customer entrance at the rear of the building, and add one more ADA accessible parking space. These two accessible parking spaces can share the same aisle. This location will likely require a new curb ramp. Note that the current location of the accessible parking and curb ramp directs disabled individuals to the double doors that lead into the new employee work area and office space, which is not the intended public accessible entrance. This current installation can result in confusion and backtracking from this unintended entrance to the intended public access at the automatic door.

Item 7. The slope of the ADA accessible parking space and access aisle is too steep in the front of these spaces near the adjacent walkway. See the photo on the right.



2010 ADA Standard 502.4 [Parking Spaces] Floor or Ground Surfaces, states, "Parking spaces and access aisles serving them shall comply with [Standard] 302. Access aisles shall be at the same level as the parking spaces they serve. Changes in level are not permitted. EXCEPTION: Slopes not steeper than 1:48 [2.08%] shall be permitted." Advisory 502.4, Floor or Ground Surfaces, states, "Access aisles [and accessible parking spaces] are required to be nearly level in all directions to provide a surface for wheelchair transfer to and from vehicles. The exception allows sufficient slope for drainage."



The slope of the parking space and access aisle is approximately 3.0% near the front of these spaces. The photo on the left is representative.

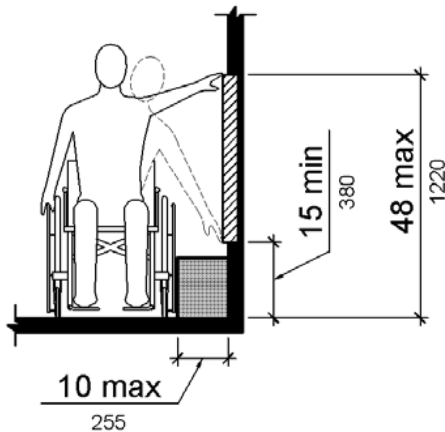
RECOMMENDATION: See items 5 and 6 above. There are several issues with this parking space, access aisle, and curb cut. If these spaces are to be abandoned there is no need to alter them. However, this slope issue will probably exist at other parking spaces along this walkway and will need to be addressed eventually. Repair as required.

Item 8. The exterior depository in the first drive-through lane is installed more than 48 inches above the driveway. See the photo on the right.



2010 ADA Standard 228.1, [Depositories, Vending Machines, Change Machines, Mail Boxes, and Fuel Dispensers] General, states, “Where provided, at least one of each type of depository, vending machine, change machine, and fuel dispenser shall comply with [Standard] 309. EXCEPTION: Drive-up only depositories shall not be required to comply with [Standard] 309.” In other words, if this installation is considered a drive-up depository only, it does not have to comply with the reach range limits. If this depository is also intended for use by individuals not in a vehicle, then it must comply with Standard 228.1”

2010 ADA Standard 309.3, [Operable Parts] Height, states, “Operable parts shall be placed within one or more of the reach ranges specified in [Standard] 308.”



2010 ADA Standard 308.3.1, [Reach Ranges, Side Reach] Unobstructed, states, “Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground.

EXCEPTION: An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum.”

The graphic on the left is representative of this Standard.

RECOMMENDATION: Consider locating the depository within the reach ranges. For disabled individuals who access this depository without a vehicle, the height of the installation will make it difficult to use. This depository may be difficult for any individuals accessing this depository from a sitting position in a vehicle.

Exterior Doors:

There are four (4) exterior entrance/exit pedestrian door installations located at this PSTC facility. One door is located at the front of the facility and three doors are located at the rear. The automated rear exterior entry/exit door, second from the right at the rear, is the only intended accessible public entry/exit door at the PSTC facility. See the photo on the right for the doors at the rear of the PSTC facility.



Item 9. The automated door marked with a temporary lawn sign for “Customer Entrance” does not have a guide rail on the swing side of the door and the manual side [left side from outside] of the door closes too quickly when released from the 90° open position. See the photo on the left. Looking from the outside, the right door is automated and the left door is manually operated. The automated door is a full-powered

“knowing act” door activated by push-button switches. Both doors swing out to open.

2010 ADA Standard 404.3, [Doors, Doorways, and Gates] Automatic and Power-Assisted Doors and Gates, states, “Automatic doors and automatic gates shall comply with [Standard] 404.3. Full-powered automatic doors shall comply with ANSI/BHMA A156.10 (incorporated by reference, see “Referenced Standards” in Chapter 1).”

ANSI/BHMA A156.10, General, Section 3.2, states, “No matter what the configuration or system, automatic swinging doors shall include guide rails, sensors or control mats, and signage for the safety and convenience of the user according to the following: Guide Rails, Section 6; Control Mats or Sensors, Section 7 or 8; Knowing Act, Section 9; Entrapment, Section 10; and Signage, Section 11.

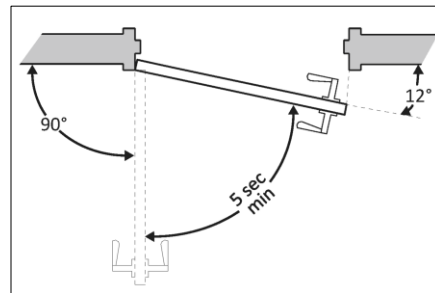
ANSI/BHMA A156.10, Guide Rails for Swing Doors section 6.1.1, states, “Two guide rails shall be installed on the swing side of each door. Pairs or double egress shall have one rail on each hinge side. Rails shall project at least to the

leading edge of the widest door in the fully open position.” Exception 4 states, “Guide rails for knowing act swinging doors serving both egress and ingress shall project out from the face of the door jambs on the swing side to no less than the outside leading edge of the open door plus 12 inches.”



The manually operated door closes too quickly (3.82 seconds). See the photo on the left.

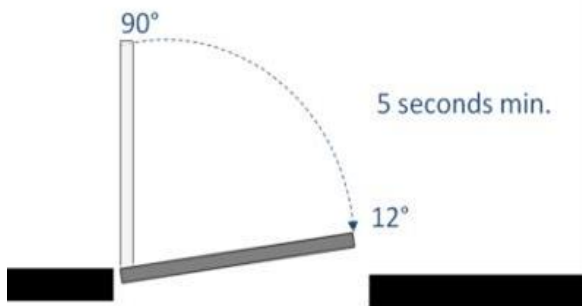
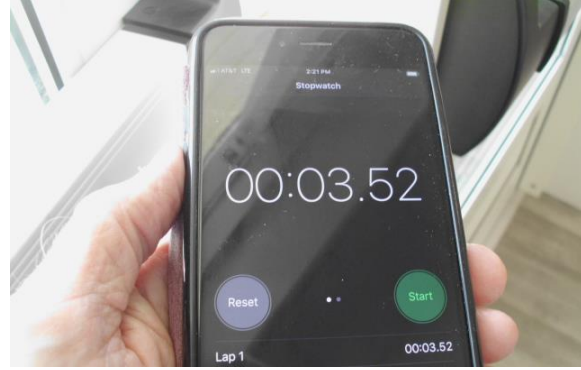
2010 ADA Standard 404.2.8.1, Door Closers and Gate Closers, states, “Door closers and gate closers shall be adjusted so that from an open position of 90 degrees, the time required to move the door to a position of 12 degrees from the latch is 5 seconds minimum.” These doors both closed to a 12 degree position in less than 5 seconds. See the graphic below for a representation of the door closer speed measurement.



Door Closure Speed Measurement

RECOMMENDATION: Install the correct guide rail(s) for the automated swinging door and adjust, repair or replace the manual door closer.

Item 10. Both the front and rear pedestrian entry/exit double doors have automatic closers that allow the doors to close too quickly and, floor mats that have deteriorated and warped edges. The photo on the right is representative of the quick closure rate.



2010 ADA Standard 404.2.8.1, [Doors] Door Closers and Gate Closers, states, "Door closers and gate closers shall be adjusted so that from an open position of 90 degrees, the time required to move the door to a position of 12 degrees from the latch is 5 seconds minimum." The graphic on the left is representative of this Standard.

The photo on the right shows a warped floor mat edge.

2010 ADA Standard 302.2, [Floor or Ground Surfaces] Carpet, states, "Carpet or carpet tile shall be securely attached and shall have a firm cushion, pad, or backing or no cushion or pad. Carpet or carpet tile shall have a level loop, textured loop, level cut pile, or level cut/uncut pile texture. Pile height shall be 1/2 inch (13 mm) maximum. Exposed edges of carpet shall be fastened to floor surfaces and shall have trim on the entire length of the exposed edge. Carpet edge trim shall comply with [Standard] 303."

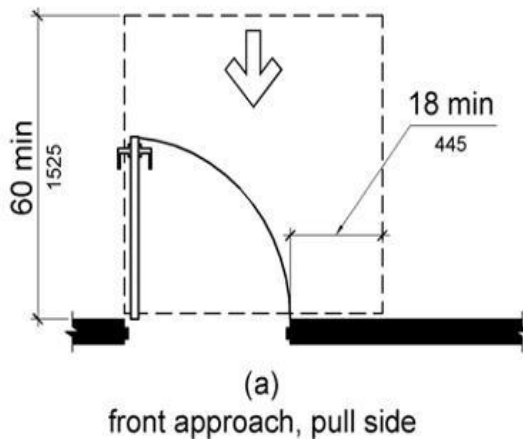


RECOMMENDATION: Repair, adjust or replace the door closers and replace these mats with devices that comply with the ADA Standards. Worn, damaged or warped edges create tripping hazards. These mats are not carpet and therefore do not have to be fastened to floor surfaces and have trim on the entire length of the exposed edge; however, they do provide the service of keeping the floor from being wet (slippery) and should be maintained in good working order and not have worn, damaged or warped edges.

Item 11. The single door located at the rear northeast corner of the facility has several discrepancies including limited maneuvering space at the exterior and interior of the facility, the automated door closer allows the door to close too quickly, and the door opening space is narrow. See the photo on the right. This door swings out to open. This door is for employees only but us not marked as such.



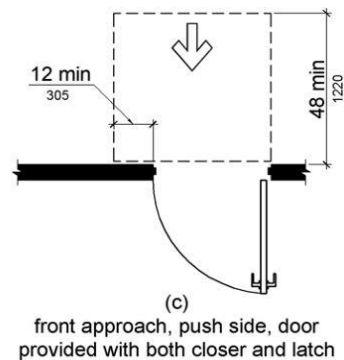
The small size of the step system landing limits the maneuvering space on the outside (pull side) of the door and the interior step system to the 2nd floor compromises the maneuvering space required on the inside (push side) of the door.



2010 ADA Standard 404.2.4.1, [Doors, Doorways, and Gates] Swinging Doors and Gates, “Swinging doors and gates shall have maneuvering clearances complying with Table 404.2.4.1.” Table 404.2.4.1 indicates for a door approached from the forward direction and pulled to open, a space of 18 inches is required parallel to the door on the latch side and 60 inches is required

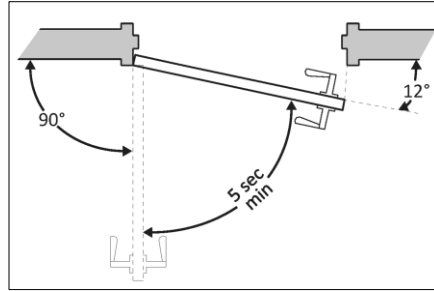
perpendicular to the door. The graphic on the left is representative of the space required in the photo above.

Table 404.2.4.1 indicates for a door with a closer and latch approached from the forward direction and pushed to open, a space of 12 inches is required parallel to the door on the latch side and 48 inches is required perpendicular to the door. The graphic on the right is representative of this requirement and the space required.



The automated door closer allows the door to close too quickly. 2010 ADA Standard 404.2.8.1, Door Closers and Gate Closers, states, “Door closers and

gate closers shall be adjusted so that from an open position of 90 degrees, the time required to move the door to a position of 12 degrees from the latch is 5 seconds minimum.” These doors both closed to a 12 degree position in less than 5 seconds. See the graphic below for a representation of the door closer speed measurement.



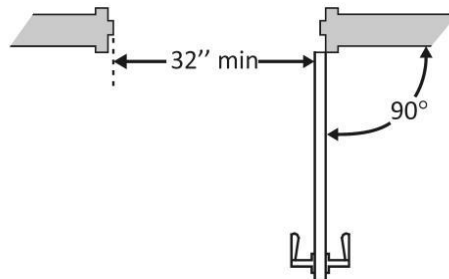
Door Closure Speed Measurement

The door opening width is only approximately 30.5 inches. 2010 ADA Standard 404.2.3, [Manual Doors, Doorways, and Manual Gates] Clear Width, states, “Door openings shall provide a clear width of 32 inches (815 mm) minimum. Clear openings of doorways with swinging doors shall be measured between the face of the door and the stop, with the door open 90 degrees. Openings more than 24 inches (610 mm) deep shall provide a clear opening of 36 inches (915 mm) minimum. There shall be no projections into the required clear opening width lower than 34 inches (865 mm) above the finish floor or ground. Projections into the clear opening width between 34 inches (865 mm) and 80 inches (2030 mm) above the finish floor or ground shall not exceed 4 inches (100 mm).

EXCEPTIONS:

1. In alterations, a projection of 5/8 inch (16 mm) maximum into the required clear width shall be permitted for the latch side stop.
2. Door closers and door stops shall be permitted to be 78 inches (1980 mm) minimum above the finish floor or ground.”

The graphic on the right is representative of door width measurements.



RECOMMENDATION: Alter the door installation so that maneuvering space is provided on both sides, and adjust, repair, or replace the door closer, and increase the door opening width to at least 32 inches.

Item 12. There is no signage at the exterior doors indicating which doors are ADA accessible and the front entry door is blocked from access by a sign that reads “Now Open”. PSTC staff indicated that the front and rear manual double doors, and the rear manual single door, are for employees only. Customers are directed to the rear automated double doors for access by a temporary lawn sign that reads “Customer Entrance”. However, there is no sign indicating that the automated door is accessible for disabled individuals. See the photo on the right. All doors can be used to exit the facility.



2010 ADA Standard 216.6, Entrances, states, “Where not all entrances comply with [Standard] 404, entrances complying with [Standard] 404 shall be identified by the International Symbol of Accessibility [ISA] complying with [Standard] 703.7.2.1. Directional signs complying with [Standard] 703.5 that indicate the location of the nearest [accessible] entrance complying with [Standard] 404 shall be provided at entrances that do not comply with [Standard] 404.” The graphic on the left is representative of the ISA sign. The graphic below is representative of a directional sign complying with [Standard] 703.5 that indicates the location of the nearest accessible entrance.



The front entry/exit door is blocked from access on the exterior by a sign that reads “Now Open”, but there is no sign indicating where the customer entrance is located or where an accessible entry is located. See the photo on the right.



RECOMMENDATION: Install the ISA sign at doors that will be accessible to the public and directional signs at doors not accessible.

Category 2 - Access to interior goods and services

The interior spaces at this facility consist of a customer service lobby that is open to the public and employee work spaces and offices that are normally not open to the public. However, it may be possible for visitors to occasionally enter the employee work areas.

The primary focus of the 2010 ADA Standards regarding employee work areas is on the pedestrian entry/exit door(s) to these spaces, an accessible circulation path for employee work areas of 1000 SF or greater, an accessible means of egress, and an audible and/or visual emergency alarm system. Egress is addressed in Category 4 below. Spaces within employee work areas that are not used exclusively for work should comply with the ADA Standards. Examples include toilet rooms, hallways, conference rooms, training rooms, and break rooms.

2010 ADA Standard Advisory 203.9, Employee Work Areas, states, “Although areas used exclusively by employees for work are not required to be fully accessible, consider designing such areas to include non-required turning spaces, and provide accessible elements whenever possible. Under the ADA, employees with disabilities are entitled to reasonable accommodations in the workplace; accommodations can include alterations to spaces within the facility. Designing employee work areas to be more accessible at the outset will avoid more costly retrofits when current employees become temporarily or permanently disabled, or when new employees with disabilities are hired.”

Reasonable accommodation only applies in employment and involves making the modifications or adjustments to a job or the work environment so a specific qualified applicant or employee with a disability can participate in the application process or perform essential job functions.

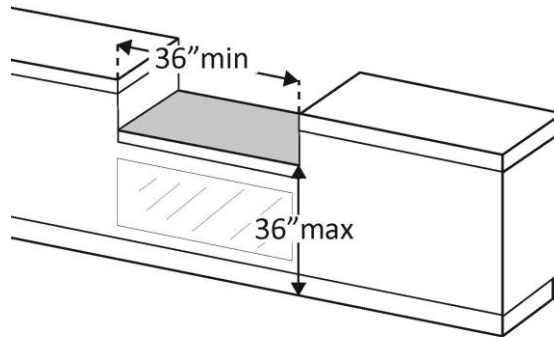
The 2010 ADA Standards require signage for certain locations such as means of egress, accessible parking, some exterior doors, elevators, some toilet rooms, TTY equipment, and Assistive Listening Systems. Building codes may require signage. When signage is installed, the 2010 ADA Standards should be applied in addition to building codes.

Item 13. The height of the service counter in the customer service lobby is too high above the finished floor at 36.5 or more inches. See the photo on the right. This counter requires a parallel approach from the public side.



The photo on the left shows the height of the counter.

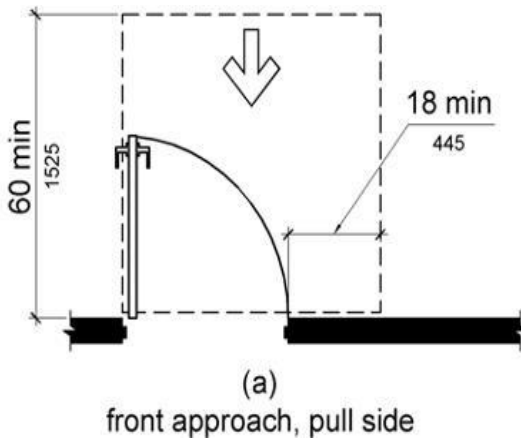
2010 ADA Standard 904.4.1, [Sales and Service Counters] Parallel Approach, states, "A portion of the counter surface that is 36 inches (915 mm) long minimum and 36 inches (915 mm) high maximum above the finish floor shall be provided." See the graphic on the right for a representation of this Standard.



RECOMMENDATION: Alter the counter so that a portion of the counter surface is 36 inches (915 mm) long minimum and 36 inches (915 mm) high maximum above the finish floor. Ensure a compliant clear space is available on the public side of the counter. Note that the employee side of the counter does not have to comply with this ADA Standard; however, continuing this accessible portion of the counter to the employee side will make the employee side of the counter accessible as well. All employee counter tops in the employee work area on the north side of the facility are between 36 – 40 inches above the finished floor.

There is a combination of interior doors with automatic closers and doors without automatic closers.

Item 14. The interior door for the employee work area on the north end of the facility does not have adequate maneuvering space on the pull side of the door. See the photo on the right. This door is pulled to open from the employee work area. This door has inadequate maneuvering space from the side shown in the photo.



2010 ADA Standard 404.2.4.1, [Doors, Doorways, and Gates] Swinging Doors and Gates, “Swinging doors and gates shall have maneuvering clearances complying with Table 404.2.4.1.” Table 404.2.4.1 indicates for a door approached from the forward direction and pulled to open, a space of 18 inches is required parallel to the door on the latch side and 60 inches is required perpendicular to the door.

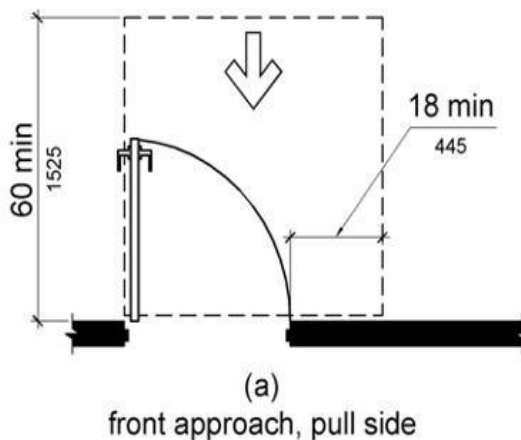
The graphic on the left is representative of the space required for the door in the photo above.

RECOMMENDATION: Alter this door installation so that maneuvering space is provided.

Item 15. The interior door in the employee work area on the north side of the facility that connects to the 2nd floor has compromised maneuvering spaces on both sides of the door and the door opening is too narrow. See the photo on the right.



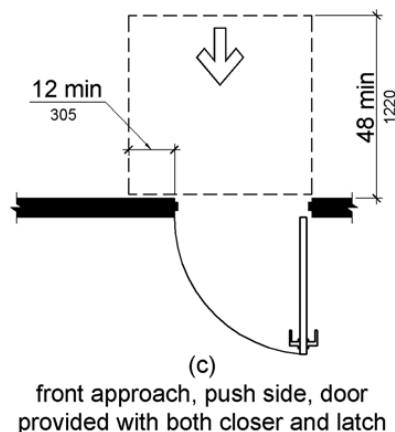
This door leads to the stair system that goes up to the second floor employee break room and to the exterior pedestrian entry/exit single door at the northeast corner of the facility. This door is pulled to open from inside the employee work area and pushed to open from the staircase side.



2010 ADA Standard 404.2.4.1, [Doors, Doorways, and Gates] Swinging Doors and Gates, "Swinging doors and gates shall have maneuvering clearances complying with Table 404.2.4.1." Table 404.2.4.1 indicates for a door approached from the forward direction and pulled to open, a space of 18 inches is required parallel to the door on the latch side and 60 inches is required perpendicular to the door.

The graphic on the left is representative of the space required in the photo above.

Table 404.2.4.1 indicates for a door approached from the forward direction and pushed to open, a space of 48 inches is required perpendicular to the door. The graphic on the right is representative of this requirement and the space required.

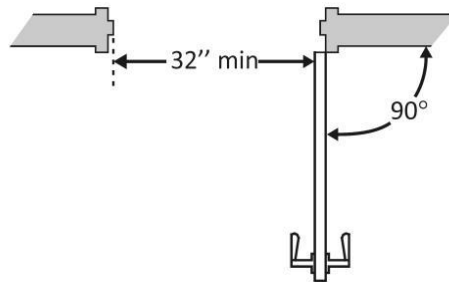


The door opening width is approximately 27.5 inches. 2010 ADA Standard 404.2.3, [Manual Doors, Doorways, and Manual Gates] Clear Width, states, "Door openings shall provide a clear width of 32 inches (815 mm) minimum. Clear openings of doorways with swinging doors shall be measured between the face of the door and the stop, with the door open 90 degrees. Openings more than 24 inches (610 mm) deep shall provide a clear opening of 36 inches (915 mm) minimum. There shall be no projections into the required clear opening width lower than 34 inches (865 mm) above the finish floor or ground. Projections into the clear opening width between 34 inches (865 mm) and 80 inches (2030 mm) above the finish floor or ground shall not exceed 4 inches (100 mm).

EXCEPTIONS:

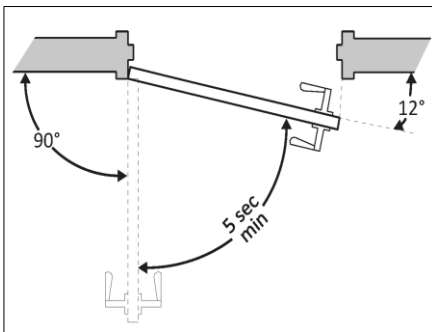
1. In alterations, a projection of 5/8 inch (16 mm) maximum into the required clear width shall be permitted for the latch side stop.
2. Door closers and door stops shall be permitted to be 78 inches (1980 mm) minimum above the finish floor or ground."

The graphic on the right is representative of door opening width measurements.



RECOMMENDATION: Alter the interior door installation so that maneuvering space is provided on both sides of the door and the door opening width is at least 32 inches.

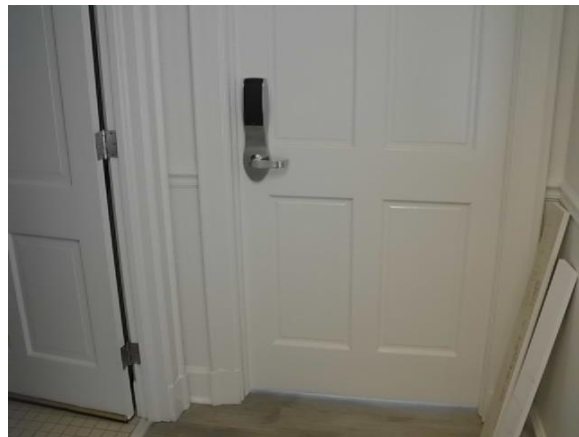
Item 16. The interior doors for the hall where the two toilet rooms are located on the first floor have automated closers that allow the doors to close too quickly and the maneuvering space on the inside/push side of the doors is limited. The photo on the right is representative of a door closer.



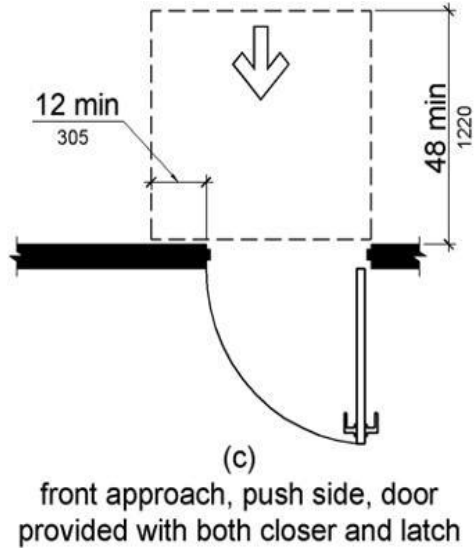
2010 ADA Standard 404.2.8.1, Door Closers and Gate Closers, states, "Door closers and gate closers shall be adjusted so that from an open position of 90 degrees, the time required to move the door to a position of 12 degrees from the latch is 5 seconds minimum." These doors both closed to a 12 degree position in less than 5 seconds. See the graphic on the left for a representation of the door closer speed

measurement.

The photo on the right is representative of these doors from the inside/push side of the door. The space to the left/latch side is less than 12 inches parallel to the door on the latch side.



2010 ADA Standard 404.2.4.1, [Doors, Doorways, and Gates] Swinging Doors and Gates, "Swinging doors and gates shall have maneuvering clearances complying with Table 404.2.4.1." Table 404.2.4.1 indicates for a door with a closer and latch approached from the forward direction and pushed to open, a space of 12 inches is required parallel to the door on the latch side and 48 inches is required perpendicular to the door. The graphic below is representative of this requirement and the space required.



RECOMMENDATION: Alter these door installations so that maneuvering space is provided on the push side and adjust, repair or replace the door closers.

Item 17. Some interior office closet doors and the interior door leading to the stairs for the second floor are too narrow in door opening width.

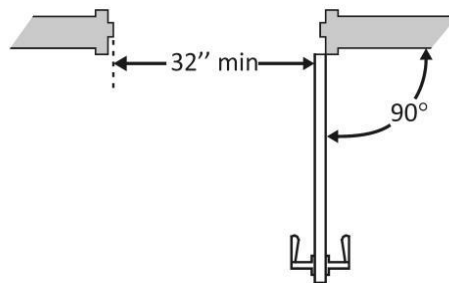
The photo on the right is representative.



2010 ADA Standard 404.2.3, [Manual Doors, Doorways, and Manual Gates] Clear Width, states, "Door openings shall provide a clear width of 32 inches (815 mm) minimum. Clear openings of doorways with swinging doors shall be measured between the face of the door and the stop, with the door open 90 degrees. Openings more than 24 inches (610 mm) deep shall provide a clear opening of 36 inches (915 mm) minimum. There shall be no projections into the required clear opening width lower than 34 inches (865 mm) above the finish floor or ground. Projections into the clear opening width between 34 inches (865 mm) and 80 inches (2030 mm) above the finish floor or ground shall not exceed 4 inches (100 mm). EXCEPTIONS:

3. In alterations, a projection of 5/8 inch (16 mm) maximum into the required clear width shall be permitted for the latch side stop.
4. Door closers and door stops shall be permitted to be 78 inches (1980 mm) minimum above the finish floor or ground."

The graphic on the right is representative of door width measurements.



RECOMMENDATION: Increase the door opening widths to at least 32 inches.

Item 18. Floor mats near some counters in the employee work areas are approximately $\frac{3}{4}$ inch vertical in height, the edges are not secured to the floor, and the slope of the edges is beveled steeper than 1:2. The photo on the right is representative.



Although floor mats are not carpet and these floor mats are not fixed elements, these installations may present tripping hazards because of the excessive change in elevation and the loose edges. These mats may significantly increase the amount of force (roll resistance) needed to propel a wheelchair over a surface.

2010 ADA Standard 303.3, [Floor or Ground Surfaces, Changes in Level] Beveled, states, "Changes in level between $\frac{1}{4}$ inch (6.4 mm) high minimum and $\frac{1}{2}$ inch (13 mm) high maximum shall be beveled with a slope not steeper than 1:2."

Advisory 303.3, Beveled, states, "A change in level of $\frac{1}{2}$ inch (13 mm) is permitted to be $\frac{1}{4}$ inch (6.4 mm) vertical plus $\frac{1}{4}$ inch (6.4 mm) beveled. However, in no case may the combined change in level exceed $\frac{1}{2}$ inch (13 mm). Changes in level exceeding $\frac{1}{2}$ inch (13 mm) must comply with [Standards] 405 (Ramps) or 406 (Curb Ramps)."

RECOMMENDATION: Replace these mats with a model that has more secure edges and no greater than $\frac{1}{2}$ inch abrupt change of vertical elevation. The principles of carpet for ADA compliance limits the height of these installations to $\frac{1}{2}$ inch and recommends secured edges.

Item 19. Two vault door openings were observed with less than 80 inches vertical clearance and vault door thresholds too high above the finished floor. The photo on the right is representative where the height above the finished floor is approximately 78 inches to an object.



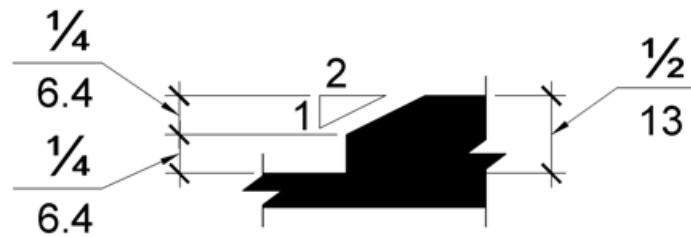
2010 ADA Standard 404.2.3, [Doors, Doorways, and Gates] Clear Width, states, "Door openings shall provide a clear width of 32 inches (815 mm) minimum. Clear openings of doorways with swinging doors shall be measured between the face of the door and the stop, with the door open 90 degrees. Openings more than 24 inches (610 mm) deep shall provide a clear opening of 36 inches (915 mm) minimum. There shall be no projections into the required clear opening width lower than 34 inches (865 mm) above the finish floor or ground. Projections into the clear opening width between 34 inches (865 mm) and 80 inches (2030 mm) above the finish floor or ground shall not exceed 4 inches (100 mm). EXCEPTIONS: 1. In alterations, a projection of 5/8 inch (16 mm) maximum into the required clear width shall be permitted for the latch side stop. 2. Door closers and door stops shall be permitted to be 78 inches (1980 mm) minimum above the finish floor or ground."



The photo on the left is where a vault door threshold is more than one inch vertical above the finished floor and not beveled not steeper than 1:2 above ¼ inch.

2010 ADA Standard 404.2.5, [Doors, Doorways, and Gates] Thresholds, states, "Thresholds, if provided at doorways, shall be ½ inch (13 mm) high maximum. Raised thresholds and changes in level at doorways shall comply with [Standards] 302 and 303. EXCEPTION: Existing or altered thresholds ¾ inch (19 mm) high maximum that have a beveled edge on each side with a slope not steeper than 1:2 shall not be required to comply with [Standard] 404.2.5."

2010 ADA Standard 303.2, [Floor or Ground Surfaces, Changes in Level] Vertical, states, "Changes in level of $\frac{1}{4}$ inch (6.4 mm) high maximum shall be permitted to be vertical." 2010 ADA Standard 303.3, [Floor or Ground Surfaces, Changes in Level] Beveled, states, "Changes in level between $\frac{1}{4}$ inch (6.4 mm) high minimum and $\frac{1}{2}$ inch (13 mm) high maximum shall be beveled with a slope not steeper than 1:2." The graphic below is representative of these Standards.



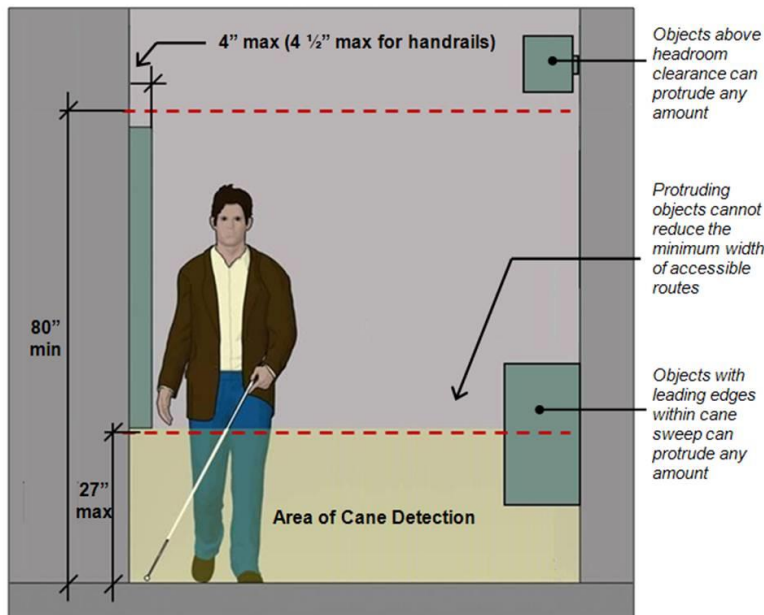
In other words, a change in level of $\frac{1}{2}$ inch is permitted to be $\frac{1}{4}$ inch vertical plus $\frac{1}{4}$ inch beveled. However, in no case may the combined change in level exceed $\frac{1}{2}$ inch. Changes in level exceeding $\frac{1}{2}$ inch must comply with [Standard] 405 (Ramps) or [Standard] 406 (Curb Ramps).

RECOMMENDATION: The doors for these vaults have been removed. There is no need for the thresholds. If possible, remove the thresholds and the objects at the top of the door openings to maximize door opening space and remove the tripping hazards associated with the thresholds.

Item 20. A protruding object [fire extinguisher] was observed in the hall for the two toilet rooms on the first floor. See the photo on the right.



2010 ADA Standard 307.2 [Protruding Objects] Protrusion Limits, states, "Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path. EXCEPTION: Handrails shall be permitted to protrude 4½ inches (115 mm) maximum." See the graphic below for a representation of this Standard.



RECOMMENDATION: Re-locate the fire extinguisher or install in an alcove.

Item 21. Some wall mounted controls such as security panels, thermostats, and wall switches are mounted too high above the finished floor. The photo on the right is representative of a security panel mounted more than 48 inches above the finished floor.

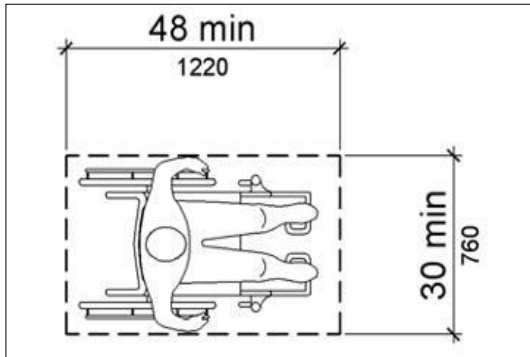
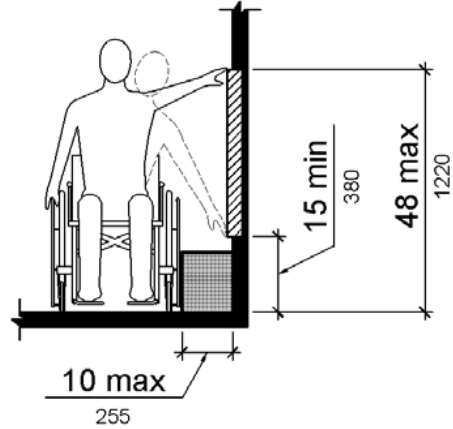


The photo on the left is a thermostat that is mounted too high above the finished floor.

The photo on the right is a wall mounted light switch in the employee area on the north end of the facility.



2010 ADA Standard 308.3.1, [Side Reach] Unobstructed, states, "Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches (1220 mm) maximum and the low side reach shall be 15 inches (380 mm) minimum above the finish floor or ground. EXCEPTION: 1. An obstruction shall be permitted between the clear floor or ground space and the element where the depth of the obstruction is 10 inches (255 mm) maximum." See the graphic on the right for a representation of this Standard.



2010 ADA Standard 206.2.4 Spaces and Elements, states, "At least one accessible route shall connect accessible building or facility entrances with all accessible spaces and elements within the building or facility which are otherwise connected by a circulation path unless exempted ..." 2010 ADA Standard 309.2 [Operable Parts] Clear Floor Space, states, "A clear floor or ground space complying with [Standard] 305 shall be

provided." See the graphic on the left for a representation of a clear floor space.

RECOMMENDATION: Relocate these wall mounted elements to comply with the high side reach and low side reach standards and, if possible, maintain a clear space at each element. This includes the toilet rooms.

Item 22. The stair system connecting the first and second floors has several discrepancies including the handrail for the stair system has blunt ends and is not high enough above the stair nosings, only one handrail was installed, the handrail cross section is too large, and the step system is steep. The photo on the right is representative of the steps leading up to the second floor.



2010 ADA Standard 210.1, [Stairways] General, states, “Interior and exterior stairs that are part of a means of egress shall comply with [Standard] 504. EXCEPTION: In alterations, stairs between levels that are connected by an accessible route shall not be required to comply with [Standard] 504, except that handrails complying with [Standard] 505 shall be provided when the stairs are altered.” In other words, if the two levels have another accessible route beyond the stair, such as an elevator, the stairs do not have to be made accessible in an alteration, but the handrails do.

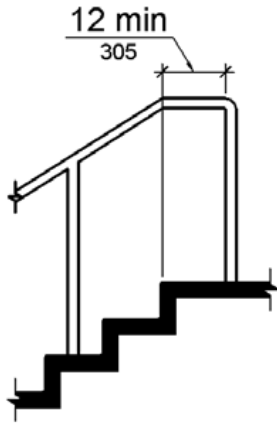
2010 ADA Standard 505.1, [Handrails] General, states, “Handrails provided along walking surfaces complying with [Standard] 403, required at ramps complying with [Standard] 405, and required at stairs complying with [Standard] 504 shall comply with [Standard] 505.”



2010 ADA Standard 505.4, [Handrails] Height, states, “Top of gripping surfaces of handrails shall be 34 inches (865 mm) minimum and 38 inches (965 mm) maximum vertically above walking surfaces, stair nosings, and ramp surfaces. Handrails shall be at a consistent height above walking surfaces, stair nosings, and ramp surfaces.” The top of this handrail is only approximately 31 inches above

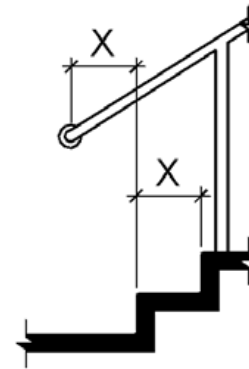
the nosings. The photo on the left is representative.

The handrail has a blunt end at the top and bottom of the stair system and the handrail cross section dimension is too large. The photo on the right is representative.

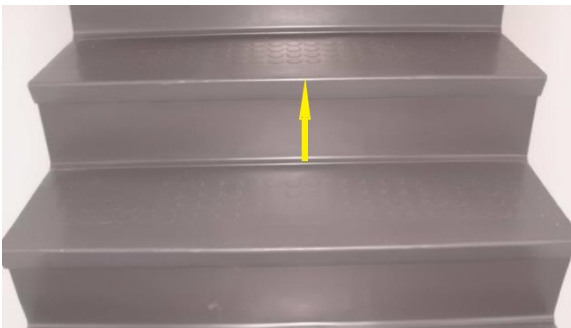


2010 ADA Standard 505.10.2, [Handrails] Top Extension at Stairs, states, "At the top of a stair flight, handrails shall extend horizontally above the landing for 12 inches (305 mm) minimum beginning directly above the first riser nosing. Extensions shall return to a wall, guard, or the landing surface, or shall be continuous to the handrail of an adjacent stair flight." The graphic on the left is representative of this Standard.

2010 ADA Standard 505.10.3, [Handrails] Bottom Extension at Stairs, states, "At the bottom of a stair flight, handrails shall extend at the slope of the stair flight for a horizontal distance at least equal to one tread depth beyond the last riser nosing. Extension shall return to a wall, guard, or the landing surface, or shall be continuous to the handrail of an adjacent stair flight." The graphic on the right is representative of this Standard.

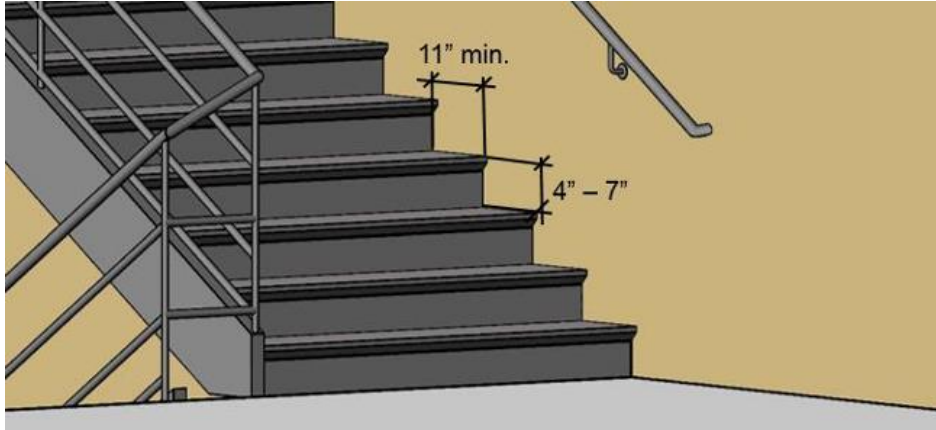


Note: X = tread depth



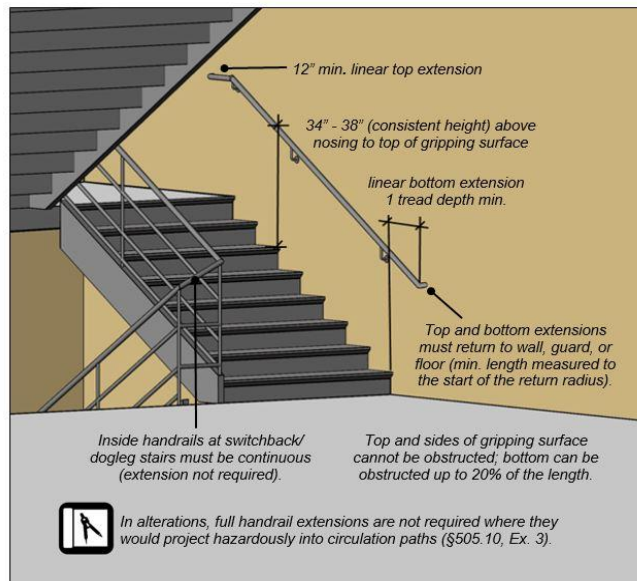
The steps have rise dimensions of approximately 8 inches. The photo on the left is representative.

2010 ADA Standard 504.2, [Stairways] Treads and Risers, "All steps on a flight of stairs shall have uniform riser heights and uniform tread depths. Risers shall be 4 inches (100 mm) high minimum and 7 inches (180 mm) high maximum. Treads shall be 11 inches (280 mm) deep minimum." The graphic below is representative.



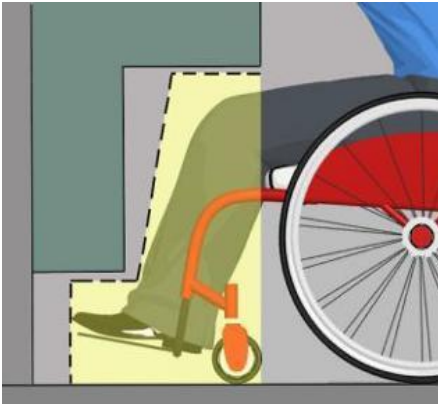
RECOMMENDATION: If the second floor will have spaces, elements, or activities that employees or non-employees may access, consider providing access for disabled individuals as well. Options could include elevators and platform lifts, although these installations are not required for this facility, based on the current size and use of the facility. See Implementation regulation §36.401, New construction, (d) Elevator exemption (2), and Implementation regulation §36.404, Alterations: Elevator exemption, (a). The graphic below is representative of stair handrail installations.

Handrails are required on both sides and must be continuous within the full length of each stair flight.



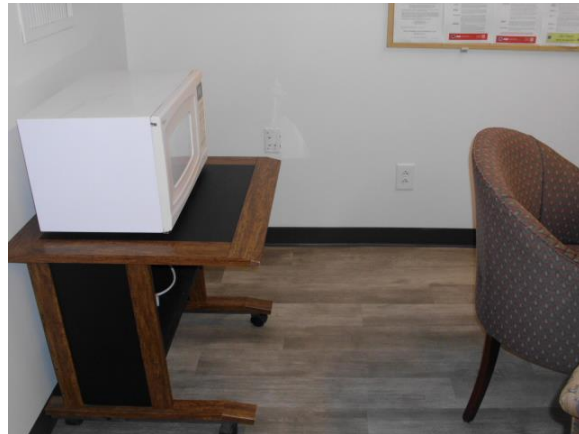
There is an employee break room and toilet room on the second floor. Since these spaces are not where work is accomplished, both areas should comply with the ADA. Both areas have discrepancies.

Item 23. The employee break room on the second floor has limited access to the dining table and microwave. See the photo on the right for the dining table.



The space below the table does not have adequate knee and toe clearance. See the photo above. 2010 ADA Standard 902.2, [Dining Surface] Clear Floor or Ground Space, states, "A clear floor space complying with [Standard] 305 positioned for a forward approach shall be provided. Knee and toe clearance complying with [Standard] 306 shall be provided." The graphic on the left is representative of knee and toe clearance.

This is a U-shaped kitchenette with only one pedestrian entry/exit point. The space between the microwave table and dining table/chairs is less than 32 inches. See the photo on the right. 2010 ADA Standard 804.2.2, [Kitchens and Kitchenettes] U-Shaped, states, "In U-shaped kitchens enclosed on three contiguous sides, clearance between all opposing base cabinets, counter tops, appliances, or walls within kitchen work areas shall be 60 inches (1525 mm) minimum." Also, accessible routes always require at least 32 inches route width and clear spaces with 30X48 inches of space at all elements.



RECOMMENDATION: Replace and relocate this dining table/chair. Although this table is not a fixed element, replacement is recommended based on the requirements for reasonable accommodations.

Category 3 - Access to toilet rooms

Three toilet rooms were observed. One toilet room is on the second floor at the employee break room and two (2) toilet rooms were observed on the first floor. At the first floor toilet rooms, one is for Women and one is for Men. These two toilet rooms are similar in design and size. Both toilet rooms have one toilet and one sink. Both toilet rooms have similar discrepancies.

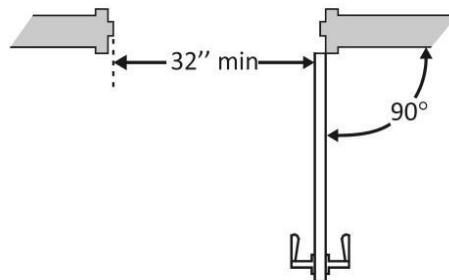
Second floor toilet room

Item 24. The second floor toilet room door opening is too narrow at 22 inches. See the photo on the right.



2010 ADA Standard 404.2.3, [Manual Doors, Doorways, and Manual Gates] Clear Width, states, "Door openings shall provide a clear width of 32 inches (815 mm) minimum. Clear openings of doorways with swinging doors shall be measured between the face of the door and the stop, with the door open 90 degrees. Openings more than 24 inches (610 mm) deep shall provide a clear opening of 36 inches (915 mm) minimum. There shall be no projections into the required clear opening width lower than 34 inches (865 mm) above the finish floor or ground. Projections into the clear opening width between 34 inches (865 mm) and 80 inches (2030 mm) above the finish floor or ground shall not exceed 4 inches (100 mm). EXCEPTIONS: In alterations, a projection of 5/8 inch (16 mm) maximum into the required clear width shall be permitted for the latch side stop.

The graphic on the right is representative of door width measurements.



RECOMMENDATION: Repair or replace the door.

Item 25. The second floor toilet room sink installation does not allow for a forward approach with a clear space and knee and toe clearance below the sink. See the photo on the right.



2010 ADA Standard 606.2, [Lavatories and Sinks] Clear Floor Space, states, “A clear floor space complying with [Standard] 305, positioned for a forward approach, and knee and toe clearance complying with [Standard] 306 shall be provided.” The graphic below is representative.

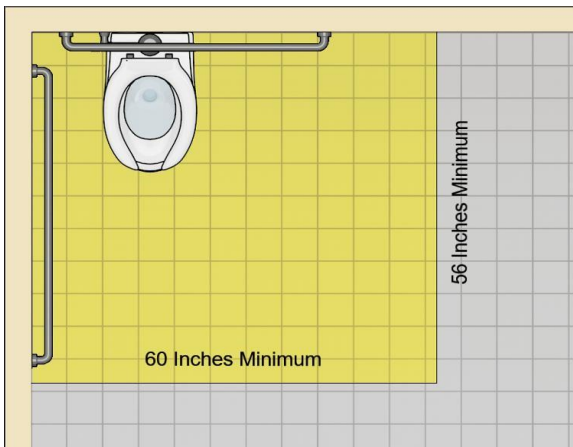


RECOMMENDATION: Install a sink assembly that complies with the ADA requirements.

Item 26. The wheelchair transfer space at the toilet and the turning space in the toilet room are too small because of the proximity of the sink/cabinet installation. See the photo on the right.



2010 ADA Standard 604.3.1, [Water Closets and Toilet Compartments, Clearance] Size, states, "Clearance around a water closet shall be 60 inches (1525 mm) minimum measured perpendicular from the side wall and 56 inches (1420 mm) minimum measured perpendicular from the rear wall."

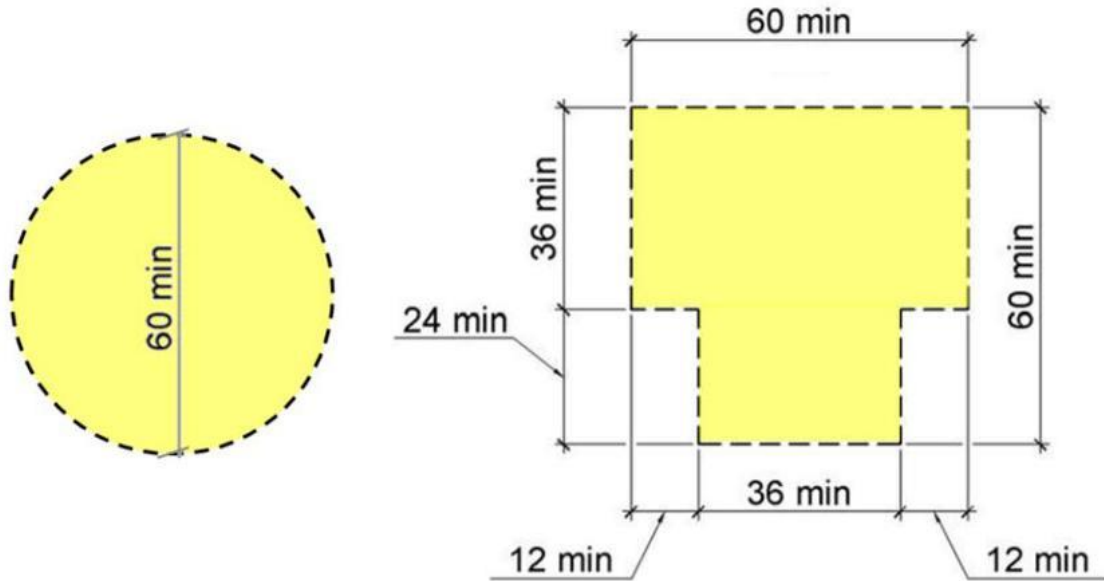


The graphic on the left is representative of a wheelchair transfer space at a toilet.

The sink/cabinet installations also limits the turning space required in a toilet room. See the photo on the right.



2010 ADA Standard 603.2.1, [Toilet and Bathing Rooms] Clearances, Turning Space, states, "Turning space complying with [Standard] 304 shall be provided within the room." The graphic below is representative of the turning space options in Standard 304.

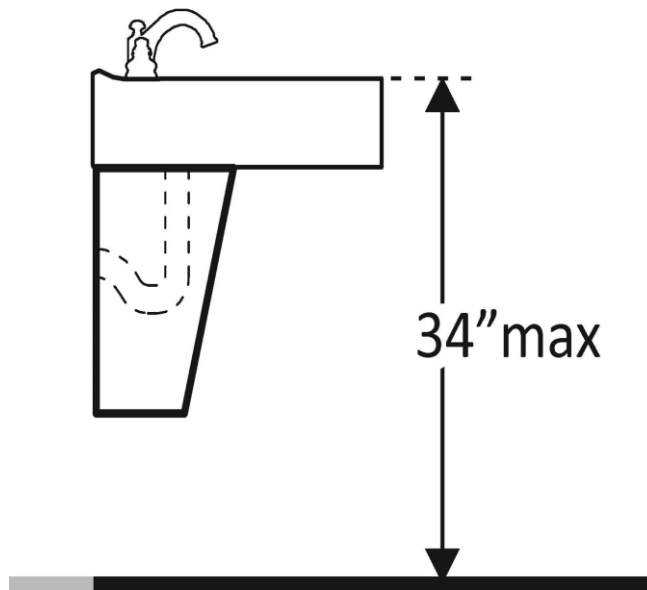


RECOMMENDATION: Consider replacing the existing sink/cabinet with a design that allows wheelchair transfer space at the toilet and a turning space within the room.

Item 27. In the second floor toilet room the front of the sink/cabinet counter is too high above the finished floor at 34.5 inches. See the photo on the right.



2010 ADA Standard 606.3, [Lavatories and Sinks] Height, states, “Lavatories and sinks shall be installed with the front of the higher of the rim or counter surface 34 inches (865 mm) maximum above the finish floor or ground.” The graphic below is representative of this Standard.



RECOMMENDATION: Replace this sink/cabinet installation with a design that complies with ADA requirements.

Item 28. No grab bars are installed at the toilet on the 2nd floor. See the photo on the right.



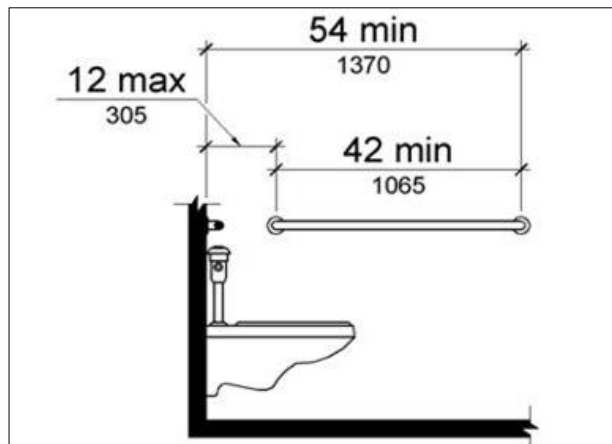
2010 ADA Standard 213.2, Toilet Rooms and Bathing Rooms, states, “Where toilet rooms are provided, each toilet room shall comply with [Standard] 603.”

2010 ADA Standard 213.3.2, [Toilet Rooms and Bathing Rooms] Water Closets [Toilets], states, “Where water closets are provided, at least one shall comply with [Standard] 604.”

2010 ADA Standard 604.1, [Water Closets and Toilet Compartments] General, states, “Water closets and toilet compartments shall comply with [Standards] 604.2 through 604.8.”

2010 ADA Standard 604.5, [Toilet Rooms and Bathing Rooms] Grab Bars, states, “Grab bars for water closets shall comply with [Standard] 609. Grab bars shall be provided on the side wall closest to the water closet and on the rear wall.”

2010 ADA Standard 604.5.1, [Grab Bar] Side Wall, states, “The side wall grab bar shall be 42 inches (1065 mm) long minimum, located 12 inches (305 mm) maximum from the rear wall and extending 54 inches (1370 mm) minimum from the rear wall. See the graphic on the right for a representation of this standard. A similar installation is required for the rear wall grab bar.

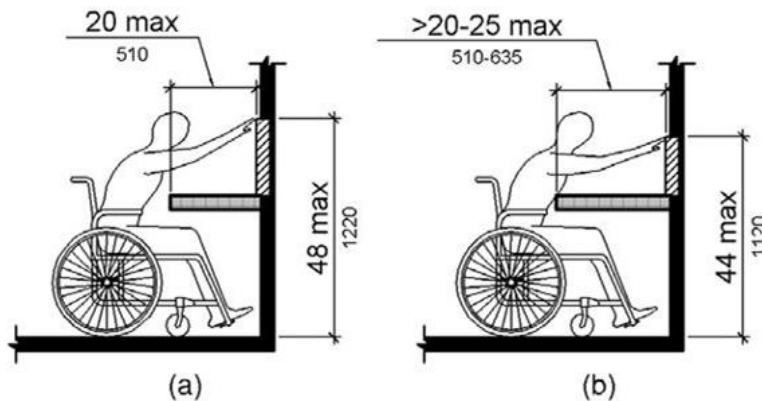


RECOMMENDATION: Install the grab bars on the rear and side walls at the toilet.

Item 29. The paper towel dispenser is installed too high above the finished floor. See the photo on the right.

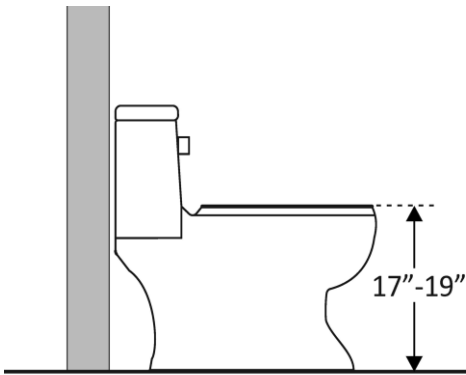


2010 ADA Standard 308.2.2, [Forward Reach] Obstructed High Reach, states, “Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum.” See the graphic below for a representation of this Standard.



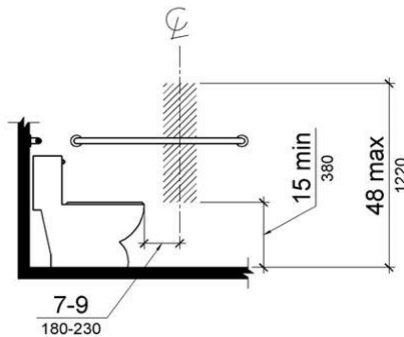
RECOMMENDATION: Relocate the paper towel dispenser to within the applicable reach range above the finished floor.

Item 30. The toilet seat height is too low to the floor and no toilet paper dispenser was observed. See the photo on the right of the toilet seat height.



2010 ADA Standard 604.4, [Water Closets and Toilet Compartments] Seats, states, “The seat height of a water closet above the finish floor shall be 17 inches (430 mm) minimum and 19 inches (485 mm) maximum measured to the top of the seat. Seats shall not be sprung to return to a lifted position.” The graphic on the left is representative of this Standard.

2010 ADA Standard 604.7, [Water Closets and Toilet Compartments] Dispensers, states, “Toilet paper dispensers shall comply with 309.4 and shall be 7 inches (180 mm) minimum and 9 inches (230 mm) maximum in front of the water closet measured to the centerline of the dispenser. The outlet of the dispenser shall be 15 inches (380 mm) minimum and 48 inches (1220 mm) maximum above the finish floor and shall not be located behind grab bars. Dispensers shall not be of a type that controls delivery or that does not allow continuous paper flow.” The graphic above is representative of this Standard.



RECOMMENDATION: Replace or alter the toilet installation to raise the toilet seat height and install a toilet paper dispenser.

First Floor Toilet Rooms

Item 31. The first floor toilet room signs are mounted too close to the floor. See the photo on the right.



2010 ADA Standard 216.8, [Signs] Toilet Rooms and Bathing Rooms, states, “Where existing toilet rooms or bathing rooms do not comply with [Standard] 603, directional signs indicating the location of the nearest toilet room or bathing room complying with [Standard] 603 within the facility shall be provided. Signs shall comply with [Standard] 703.5 and shall include the International Symbol of Accessibility complying with [Standard] 703.7.2.1. Where existing toilet rooms or bathing rooms do not comply with [Standard] 603, the toilet rooms or bathing rooms complying with [Standard] 603 shall be identified by the International Symbol of Accessibility complying with [Standard] 703.7.2.1.”

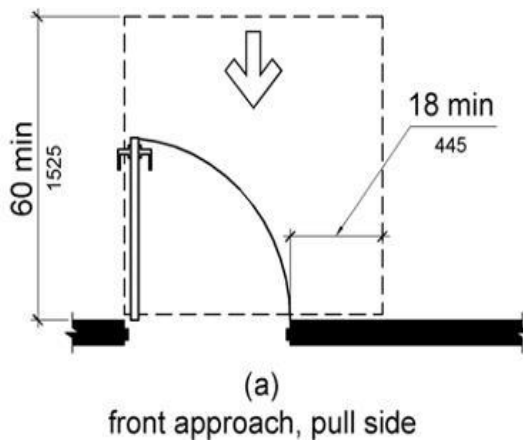
703.4.1, [Signs] Height Above Finish Floor or Ground, states, “Tactile characters on signs shall be located 48 inches (1220 mm) minimum above the finish floor or ground surface, measured from the baseline of the lowest tactile character and 60 inches (1525 mm) maximum above the finish floor or ground surface, measured from the baseline of the highest tactile character.”

RECOMMENDATION: Relocate the signs to comply with the ADA Standards.

Item 32. In both toilet rooms there is inadequate door maneuvering space due to the proximity of the sink and trash can to the entry/exit doors. The photo on the right is representative.



In both toilet rooms the entry/exit doors open to the inside of the toilet rooms.



2010 ADA Standard 404.2.4.1, [Doors, Doorways, and Gates] Swinging Doors and Gates, "Swinging doors and gates shall have maneuvering clearances complying with Table 404.2.4.1." Table 404.2.4.1 indicates for a door approached from the forward direction and pulled to open, a space of 18 inches is required parallel to the door on the latch side and 60 inches is required perpendicular to the door.

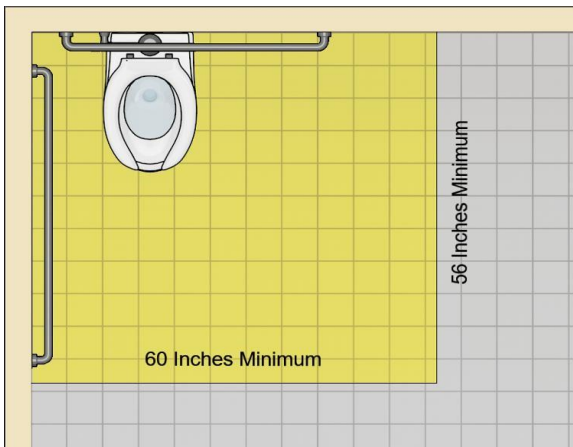
The graphic on the left is representative of the space required in the photo above.

RECOMMENDATION: Relocate the trash cans and consider increasing the space in these toilet rooms to create the door maneuvering space, or consider combining both toilet rooms into one unisex toilet room.

Item 33. In both first floor toilet rooms the wheelchair transfer spaces at the toilets are too small because of the proximity of the sink installation to the toilets. The photo on the right is representative.



2010 ADA Standard 604.3.1, [Water Closets and Toilet Compartments, Clearance] Size, states, "Clearance around a water closet shall be 60 inches (1525 mm) minimum measured perpendicular from the side wall and 56 inches (1420 mm) minimum measured perpendicular from the rear wall."



The graphic on the left is representative of a wheelchair transfer space at a toilet.

RECOMMENDATION: Consider increasing the space in these toilet rooms to create the transfer space at the toilets, or consider combining both toilet rooms into one unisex toilet room.

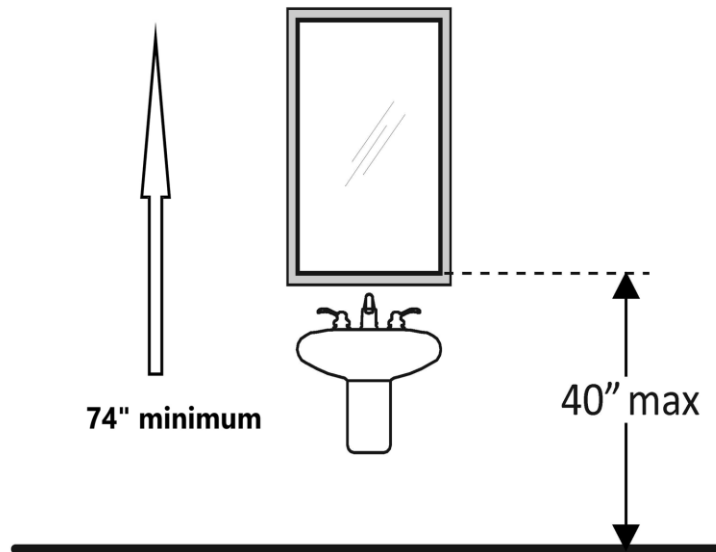
Item 34. The mirror installed above the sink in the first floor Men's toilet room is too small for ADA compliance where the bottom edge of the reflecting surface is too high above the floor. See the photo on the right. The metal frame is not considered a reflecting surface.



2010 ADA Standard 603.3 Mirrors, states, "Mirrors located above lavatories (sinks) or counter tops shall be installed with the bottom edge of the reflecting surface 40 inches (1015 mm) maximum above the finish floor or ground."

Advisory 603.3, Mirrors, states, "A single full-length mirror can accommodate a greater number of people, including children. In order for mirrors to be usable by people who are ambulatory and people who use wheelchairs, the top edge of mirrors should be 74 inches (1880 mm) minimum from the floor or ground."

The graphic below is representative of this Standard and Advisory.

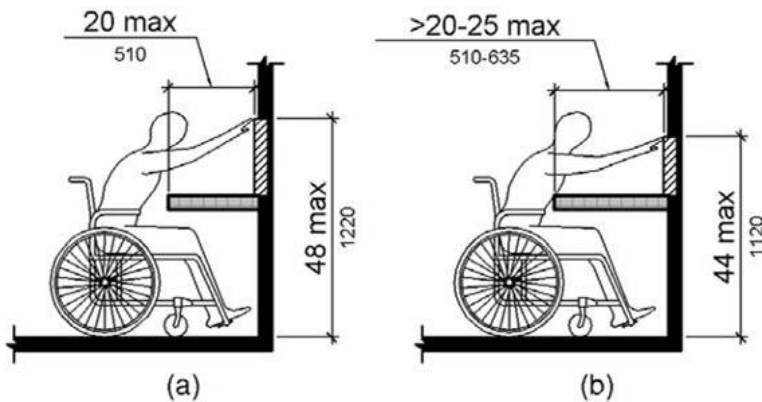


RECOMMENDATION: The mirror should be replaced.

Item 35. In both first floor toilet rooms the paper towel dispensers are installed too high above the finished floor. The photo on the right is representative.



2010 ADA Standard 308.2.2, [Forward Reach] Obstructed High Reach, states, "Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum." See the graphic below for a representation of this Standard.



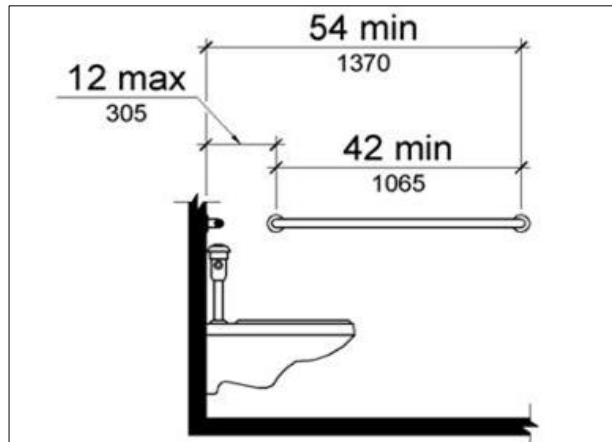
RECOMMENDATION: Relocate the paper towel dispensers to within the applicable reach range above the finished floor.

Item 36. In both first floor toilet rooms the side wall grab bars are installed too close to the rear wall.
The photo on the right is representative



2010 ADA Standard 604.5, [Toilet Rooms and Bathing Rooms] Grab Bars, states, "Grab bars for water closets [toilets] shall comply with [Standard] 609. Grab bars shall be provided on the side wall closest to the water closet and on the rear wall."

2010 ADA Standard 604.5.1, [Grab Bar] Side Wall, states, "The side wall grab bar shall be 42 inches (1065 mm) long minimum, located 12 inches (305 mm) maximum from the rear wall and extending 54 inches (1370 mm) minimum from the rear wall. See the graphic on the right for a representation of this standard. The side wall grab bars in these toilet rooms are installed only a few inches from the rear wall, which prevents the side wall grab bars from extending 54 inches (1370 mm) minimum from the rear wall.

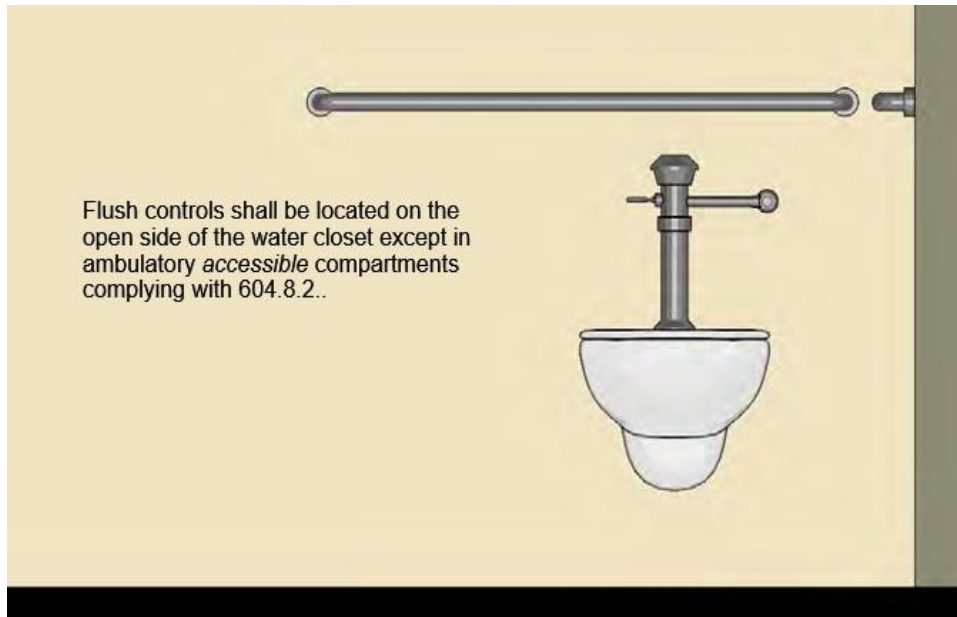


RECOMMENDATION: Install the grab bars on the side walls at the toilets correctly according to the ADA Standards.

Item 37. In the first floor Men's toilet room the toilet flush handle is not located on the open side of the toilet. See the photo on the right.

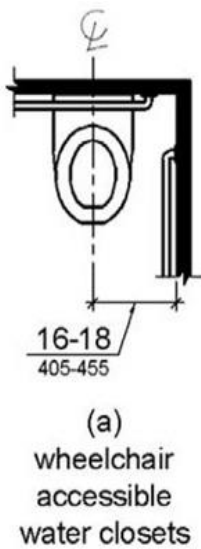


2010 ADA Standard 604.6, [Water Closets and Toilet Compartments] Flush Controls, states, "Flush controls shall be hand operated or automatic. Hand operated flush controls shall comply with [Standard] 309. Flush controls shall be located on the open side of the water closet except in ambulatory accessible compartments complying with [Standard] 604.8.2." The graphic below is representative of this Standard.



RECOMMENDATION: Replace or alter the toilet installation to place the flush handle on the open side of the toilet in the first floor Men's toilet room.

Item 38. In the first floor Women's toilet room the toilet is installed slightly too far from the side wall. See the photo on the right.



2010 ADA Standard 604.2, [Water Closets and Toilet Compartments] Location, "The water closet shall be positioned with a wall or partition to the rear and to one side. The centerline of the water closet shall be 16 inches (405 mm) minimum to 18 inches (455 mm) maximum from the side wall or partition, except that the water closet shall be 17 inches (430 mm) minimum and 19 inches (485 mm) maximum from the side wall or partition in the ambulatory accessible toilet compartment specified in 604.8.2. Water closets shall be arranged for a left-hand or right-hand approach." The graphic on the left is representative of this Standard.

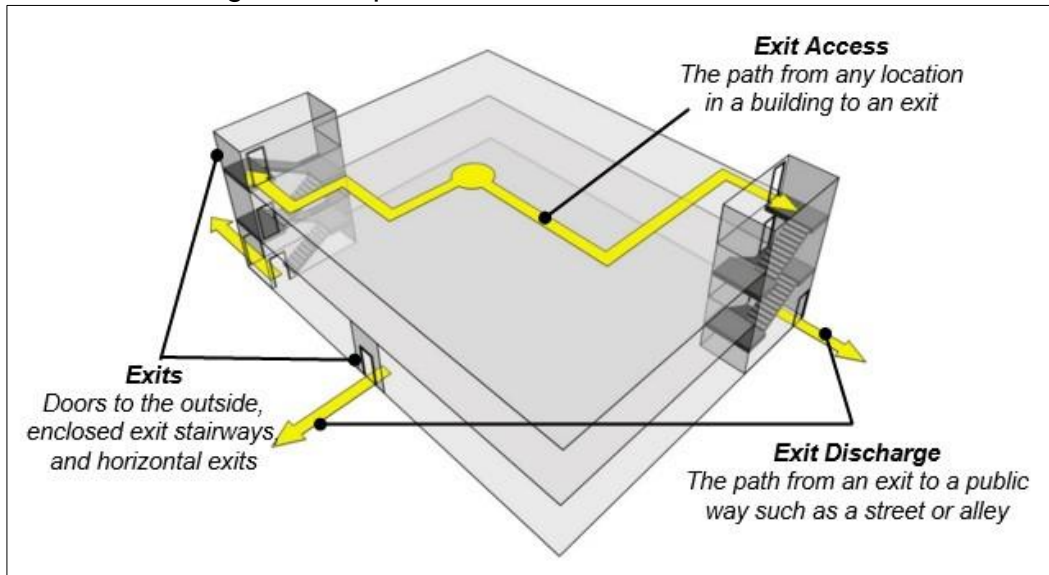
RECOMMENDATION: Consider relocating the toilet to within ADA Standards from the side wall.

Category 4: Egress

Item 39. The exterior door near the rear northeast corner of the facility is narrow and has step installations that will interfere with the egress route through this door for individuals with limited mobility. See the photo on the right.



According to the United States Access Board Standards Guide, the International Building Code (IBC) requires at least two means of egress from all spaces and buildings with few exceptions. Some spaces and buildings are allowed to have one means of egress if the travel distance to an exit is short and the occupant load is low. For example, a business occupancy with no more than 30 occupants and a maximum exit access travel distance of 75 feet is permitted to have a single means of egress. More than two means of egress are required where the occupant load is 500 or more (at least 3) and 1,000 or more (at least 4). The IBC requirements for accessible means of egress apply to new construction. Accessible means of egress are not required to be added in alterations to existing facilities. See the diagram below for a representation of egress components.



Building Egress Components

RECOMMENDATION: Consider altering this door at the rear northeast corner to provide an accessible emergency egress route. This door could be critical in an emergency for egress of individuals in the north side employee work area and 2nd floor break room.

SUMMARY:

This completes the Tier III ADA survey results for this site. The overall condition of this facility with respect to ADA compliance is poor.

This PCR does not compare the installation to local, state, or national building codes. In summary, several discrepancies exist when compared to the 2010 Standards. The list below summarizes the discrepancies above. These items should be addressed as part of any alterations to the building.

Item	Discrepancy	Recommendation
1	There is no signage at the municipal walkway directing disabled individuals to the intended public accessible rear entrance.	To avoid confusion and possible back-tracking from the front of the facility, place a sign at this front walkway connection shown in the photo above pointing to the accessible parking and the intended public accessible entrance at the rear of the facility.
2	The accessible municipal walkway that crosses the driveway in front of the facility has a damaged surface that has created excessive openings.	Contact the municipality regarding repairs to this part of the walkway to level the surface.
3	One walkway from the front entrance toward the rear entrances is not 36 inches minimum in width and the walkway along the south end of the facility has excessive cross-slope.	Consider increasing route widths to 36 inches, where feasible, and reducing cross-slope to 2.08% or less. This is important for daily access under normal conditions and also for emergency egress.
4	The walkway across the rear of the facility and along the side of the parking lot has a cross-slope exceeding 2.08% and there are no vehicle wheel stops at the parking spaces.	Consider reducing the walkway cross-slope to 2.08% or less and install wheel stops at all parking spaces along this walkway. This is important for daily access under normal conditions and also for emergency egress.
5	The curb ramp for the existing ADA accessible parking space aisle has curb ramp flares that are sloped too steeply and a rough transition at the asphalt.	If this curb ramp is to remain, the curb ramp and transition should be replaced or repaired to comply with the ADA Standards. See item 6 below for related information.
6	There is only one marked ADA accessible parking space observed at the site and it is not the parking space located closest to the one public pedestrian exterior entrance.	Relocate the current van-accessible parking space and access aisle to the closest space available to the customer entrance at the rear of the building, and add one more ADA accessible parking space.
7	The slope of the ADA accessible parking space and access aisle is too steep in the front of these spaces near the adjacent walkway.	See items 5 and 6 above. There are several issues with this parking space, access aisle, and curb cut. If these spaces are to be abandoned there is no need to alter them. However, this slope issue will probably exist at other parking spaces along this walkway and will need to be addressed eventually. Repair as required.
8	The exterior depository in the first drive-through lane is installed more than 48 inches above the driveway.	Consider locating the depository within the reach ranges. For disabled individuals who access this depository without a vehicle, the height of the installation will make it difficult to use. This depository may be difficult for any individuals accessing this depository from a sitting position in a vehicle.
9	The automated door marked with a temporary lawn sign for "Customer Entrance" does not have a guide rail on the	Install the correct guide rail(s) for the automated swinging door and adjust, repair or replace the manual door closer.

	swing side of the door and the manual side [left side from outside] of the door closes too quickly when released from the 90° open position.	
10	Both the front and rear entry/exit double doors have automatic closers that allow the doors to close too quickly and, floor mats that have deteriorated and warped edges.	Repair, adjust or replace the door closers and replace these mats with devices that comply with the ADA Standards. Worn, damaged or warped edges create tripping hazards.
11	The single door located at the rear northeast corner of the facility has several discrepancies including limited maneuvering space at the exterior and interior of the facility, the automated door closer allows the door to close too quickly, and the door opening space is narrow.	Alter the door installation so that maneuvering space is provided on both sides, and adjust, repair, or replace the door closer, and increase the door opening width to at least 32 inches.
12	There is no signage at the exterior doors indicating which doors are ADA accessible and the front entry door is blocked from access by a sign that reads "Now Open".	Install the ISA sign at doors that will be accessible to the public and directional signs at doors not accessible.
13	The height of the service counter in the customer service lobby is too high above the finished floor at 36.5 or more inches.	Alter the counter so that a portion of the counter surface is 36 inches (915 mm) long minimum and 36 inches (915 mm) high maximum above the finish floor. Ensure a compliant clear space is available on the public side of the counter.
14	The interior door for the employee work area on the north end of the facility does not have adequate maneuvering space on the pull side of the door.	Alter this door installation so that maneuvering space is provided.
15	The interior door in the employee work area on the north side of the facility that connects to the 2nd floor has compromised maneuvering spaces on both sides of the door and the door opening is too narrow.	Alter the interior door installation so that maneuvering space is provided on both sides of the door and the door opening width is at least 32 inches.
16	The interior doors for the hall where the two toilet rooms are located on the first floor have automated closers that allow the doors to close too quickly and the maneuvering space on the inside/push side of the doors is limited.	Alter these door installations so that maneuvering space is provided on the push side and adjust, repair or replace the door closers.
17	Some interior office closet doors and the interior door leading to the stairs for the second floor are too narrow in door opening width.	Increase the door opening widths to at least 32 inches.
18	Floor mats near some counters in the employee work areas are approximately ¾ inch vertical in height, the edges are not secured to the floor, and the slope of the edges is beveled steeper than 1:2.	Replace these mats with a model that has more secure edges and no greater than ½ inch abrupt change of vertical elevation.
19	Two vault door openings were observed with less than 80 inches vertical clearance and vault door thresholds too high above the finished floor.	The doors for these vaults have been removed. There is no need for the thresholds. If possible, remove the thresholds and the objects at the top of the door openings to maximize door opening space and remove the tripping hazards associated with the thresholds.
20	A protruding object [fire extinguisher] was observed in the hall for the two toilet rooms on the first floor.	Re-locate the fire extinguisher or install in an alcove.
21	Some wall mounted controls such as security panels, thermostats, and wall switches are mounted too high above the finished floor.	Relocate these wall mounted elements to comply with the high side reach and low side reach standards and, if possible, maintain a clear space at each element.

22	The stair system connecting the first and second floor has several discrepancies including the handrail for the stair system has blunt ends and is not high enough above the stair nosings, only one handrail was installed, the handrail cross section is too large, and the step system is steep.	If the second floor will have spaces, elements, or activities that employees or non-employees may access, consider providing access for disabled individuals as well.
23	The employee break room on the second floor has limited access to the dining table and microwave.	Replace and relocate this dining table/chair. Although this table is not a fixed element, replacement is recommended based on the requirements for reasonable accommodations.
24	The second floor toilet room door opening is too narrow at 22 inches.	Repair or replace the door.
25	The second floor toilet room sink installation does not allow for a forward approach with a clear space and knee and toe clearance below the sink.	Install a sink assembly that complies with the ADA requirements.
26	The wheelchair transfer space at the toilet and the turning space in the toilet room are too small because of the proximity of the sink/cabinet installation.	Consider replacing the existing sink/cabinet with a design that allows wheelchair transfer space at the toilet and a turning space within the room.
27	In the second floor toilet room the front of the sink/cabinet counter is too high above the finished floor at 34.5 inches.	Replace this sink/cabinet installation with a design that complies with ADA requirements.
28	No grab bars are installed at the toilet on the 2nd floor.	Install the grab bars on the rear and side walls at the toilet.
29	The paper towel dispenser is installed too high above the finished floor.	Relocate the paper towel dispenser to within the applicable reach range above the finished floor.
30	The toilet seat height is too low to the floor and no toilet paper dispenser was observed.	Replace or alter the toilet installation to raise the toilet seat height and install a toilet paper dispenser.
31	The first floor toilet room signs are mounted too close to the floor.	Relocate the signs to comply with the ADA Standards.
32	In both toilet rooms there is inadequate door maneuvering space due to the proximity of the sink and trash can to the entry/exit doors.	Relocate the trash cans and consider increasing the space in these toilet rooms to create the door maneuvering space, or consider combining both toilet rooms into one unisex toilet room.
33	In both first floor toilet rooms the wheelchair transfer spaces at the toilets are too small because of the proximity of the sink installation to the toilets.	Consider increasing the space in these toilet rooms to create the transfer space at the toilets, or consider combining both toilet rooms into one unisex toilet room.
34	The mirror installed above the sink in the first floor Men's toilet room is too small for ADA compliance where the bottom edge of the reflecting surface is too high above the floor.	The mirror should be replaced.
35	In both first floor toilet rooms the paper towel dispensers are installed too high above the finished floor.	Relocate the paper towel dispensers to within the applicable reach range above the finished floor.
36	In both first floor toilet rooms the side wall grab bars are installed too close to the rear wall.	Install the grab bars on the side walls at the toilets correctly according to the ADA Standards.
37	In the first floor Men's toilet room the toilet flush handle is not located on the open side of the toilet.	Replace or alter the toilet installation to place the flush handle on the open side of the toilet in the first floor Men's toilet room.
38	In the first floor Women's toilet room the toilet is installed slightly too far from the side wall.	Consider relocating the toilet to within ADA Standards from the side wall.
39	The exterior door near the rear northeast corner of the facility is narrow and has step installations that will interfere with the	Consider altering this door at the rear northeast corner to provide an accessible emergency egress route. This door could be critical in an

	egress route through this door for individuals with limited mobility.	emergency for egress of individuals in the north side employee work area and 2nd floor break room.
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In choosing which accessible elements to provide during alterations, priority should be given to those elements that will provide the greatest access, in the following order [28 CFR Part 36.403(g)2]:

- (i) An accessible entrance;
- (ii) An accessible route to the altered area;
- (iii) At least one accessible restroom for each sex or a single unisex restroom;
- (iv) Accessible telephones;
- (v) Accessible drinking fountains; and
- (vi) When possible, additional accessible elements such as parking, storage, and alarms.

Regarding barrier removal regardless of plans for modification or alteration, Implementation Regulation 28 CFR Part 36.304, states:

- (a) General. A public accommodation shall remove architectural barriers in existing facilities, including communication barriers that are structural in nature, where such removal is readily achievable, i.e., easily accomplishable and able to be carried out without much difficulty or expense.
- (b) Examples. Examples of steps to remove barriers include, but are not limited to, the following actions –
 - (1) Installing ramps;
 - (2) Making curb cuts in sidewalks and entrances;
 - (3) Repositioning shelves;
 - (4) Rearranging tables, chairs, vending machines, display racks, and other furniture;
 - (5) Repositioning telephones;
 - (6) Adding raised markings on elevator control buttons;
 - (7) Installing flashing alarm lights;
 - (8) Widening doors;
 - (9) Installing offset hinges to widen doorways;
 - (10) Eliminating a turnstile or providing an alternative accessible path;
 - (11) Installing accessible door hardware;
 - (12) Installing grab bars in toilet stalls;
 - (13) Rearranging toilet partitions to increase maneuvering space;
 - (14) Insulating lavatory pipes under sinks to prevent burns;
 - (15) Installing a raised toilet seat;
 - (16) Installing a full-length bathroom mirror;
 - (17) Repositioning the paper towel dispenser in a bathroom;

- (18) Creating designated accessible parking spaces;
 - (19) Installing an accessible paper cup dispenser at an existing inaccessible water fountain;
 - (20) Removing high pile, low density carpeting; or
 - (21) Installing vehicle hand controls.
- (c) Priorities. A public accommodation is urged to take measures to comply with the barrier removal requirements of this section in accordance with the following order of priorities.
 - (1) First, a public accommodation should take measures to provide access to a place of public accommodation from public sidewalks, parking, or public transportation. These measures include, for example, installing an entrance ramp, widening entrances, and providing accessible parking spaces.
 - (2) Second, a public accommodation should take measures to provide access to those areas of a place of public accommodation where goods and services are made available to the public. These measures include, for example, adjusting the layout of display racks, rearranging tables, providing Brailled and raised character signage, widening doors, providing visual alarms, and installing ramps.
 - (3) Third, a public accommodation should take measures to provide access to restroom facilities. These measures include, for example, removal of obstructing furniture or vending machines, widening of doors, installation of ramps, providing accessible signage, widening of toilet stalls, and installation of grab bars.
 - (4) Fourth, a public accommodation should take any other measures necessary to provide access to the goods, services, facilities, privileges, advantages, or accommodations of a place of public accommodation.

Consider designating or hiring an individual to fill the roll of ADA Coordinator (ADAC). This individual would be responsible for ADA compliance of all facilities including barrier removal programs.

The suggestions or recommendations presented herein are solely for your use. No reports, descriptions, or analysis concerning this property will be released to others without your written permission.

This Property Condition Report is limited to the amount of time spent on the site and the scope as outlined by our Contract for ADA Inspection and Expert Witness Services. Conclusions and recommendations presented herein are based on the visual evidence gathered during the survey, experience, and professional judgment. These conclusions and recommendations should be considered advice, not mandates or binding guidance. This PCR needs to be read in entirety.

Please be advised that should these ADA Inspection services further require the services of an ADAIN representative in legal proceedings such as litigation or a lawsuit, whether voluntary or involuntary for the ADAIN representative, the fee for those services rendered by a ADAIN representative would be \$125/ hour per each ADAIN individual required, including travel time and preparation, plus expenses, charged at a rate of 8 hours per day, unless otherwise agreed.

Thank you,



Richard Acree
ADA Compliance Inspector, Title II and III

