



**REPORT FOR CODE & ACCESSIBILITY COMPLIANCE**  
**UUSS SITE & BUILDING ASSESSMENT STUDY**

The purpose of my site visit was to examine the building code and accessibility code compliance for the facilities on the project site. I was looking for any immediate problems relative to health safety and welfare as well as looking for issues which should be considered as part of a long term renovation program for the facility campus. I found only one major building code issue needing immediate remediation as noted below. Codes evolve over time. This building was constructed in the mid-1960's. There are a number of items which would not be considered compliant with the current building code now in effect, the 2007 California Building Code (07CBC), however, under the current building code as long as existing parts of a building were compliant with the building code in effect at the time the work was originally constructed, there is no affirmative requirement to make corrections to existing facilities which may be at variance with the current code standards contained in the 07CBC. I did not perform detailed research into the code requirements at the time of construction, or determine if the 1965 documents were code compliant. The building design was done by a licensed architect and built with a permit. The project components appear to be consistent with buildings of its period and appear well constructed for their day. While there is no affirmative duty to do upgrade work note that if new work is undertaken for which a permit must be obtained, whether for additions, alterations, repairs or new facilities, the work done under that permit must meet the requirements of the current building code.

The only time there is a proactive duty to renovate work already in place is when barrier removal for access to persons with disabilities is undertaken under the Americans with Disabilities Act (ADA). This work must be done by "public accommodations" where the barrier removal work is "readily achievable" (defined as being easily accomplishable without much difficulty or expense). Note, however, that religious institutions are not covered by the Americans with Disabilities Act. There is thus no requirement to perform barrier removal in this facility even if this is "readily achievable", as there would be in other non-religious institutional venues. Note that if the facilities are rented out to other non-religious users then their use of the facility could be considered to be by a "public accommodation" and readily achievable standards could apply. Note also that while the building code is interpreted and enforced by the local building department there is no permitting or enforcing authority for the ADA. The ADA is solely enforced by legal action when a plaintiff alleges lack of compliance with the ADA. Again, this pathway is not relevant for this religious facility unless it could be considered to be a "public accommodation" at certain times. We commend the congregation for diligently working to provide access to their facility above and beyond their obligation under the ADA and the 07CBC. That being said the largest body of items still not compliant with current requirements in the 07CBC, and the ADA, fall into the realm of accessibility for persons with disabilities, as noted in my report.

Even though the ADA may not apply to this facility religious institutions are covered by accessibility requirements in California under the 07CBC. However, accessibility and other code-related upgrades are triggered only by permitted work. There is no affirmative requirement for barrier removal under the California Building Code. Code criteria cited in this report are from the 2007 California Building Code unless noted otherwise since this is the document that applies to this occupancy in California, not the ADA Accessibility Guidelines (ADAAG). Note that

many people use the term “ADA” generically to denote accessibility work under both the Americans with Disabilities Act and the California Building Code. That is not the case. There is no “ADA” work necessary at religious institutions. work done under a permit must comply with the 07CBC. There certainly will be accessibility work necessary if permitted work is to be done. The proper generic term for this work should be “Accessibility” not “ADA”. The accessibility comments below in this report are not mandatory without being triggered by permitted construction work as noted above. These should be seen as items to be undertaken as part of other projects on the site and not as imperatives.

### **Accessibility - General**

Accessibility for existing buildings under the 07CBC requires attention to getting into the building from the parking lot, to the entry to the building and then into the area of interior alterations. New construction applies the accessible path of travel requirements all the way to the edge of the site. While there is not an affirmative barrier removal trigger independent of a permit, when a permit is required then work must be done to make it possible for persons with disabilities to get into the building’s main entrance, and use toilets, drinking fountains and public telephones even if those areas are outside of the area where work is intended to be undertaken. It is also worth keeping in mind that the range of disabilities to be accommodated under access statutes and codes includes not just people in wheelchairs, but other people with limited mobility such as persons with leg braces, people with low or no vision, hearing-impaired persons, persons of short stature and persons with other cognitive disabilities. Accessibility goes beyond just wheelchair accommodation. As noted above the path of travel requirements apply only to accessibility requirements and do not apply to egress requirements where existing conditions may be at variance from current codes for such things as stair rise and run dimensions, egress widths, door widths or handrail configurations.

### **Tier 1 Item:**

I identified only one item which I believe requires immediate attention from a building code or accessibility standpoint.

1. The non-accessible unisex Restroom Number 2 at the Classroom Wing should be clearly labeled as non-accessible for persons with mobility impairments. The unisex sign is not specifically noted in the code as denoting accessibility, but it is contained in Chapter 11B of the CBC, the chapter related to accessibility for public accommodations. Most people on seeing the circle with a triangle superimposed will assume the rest room to be accessible. This toilet room is not accessible for persons with mobility impairments and the signage could lead someone to believe it is at least partially accessible, when it is deficient in several significant ways. The primary deficiency is that is that the room does not have grab bars at the water closet so there is no way for a mobility-impaired person to use the facilities. Also the piping on the lavatory is not insulated so that if there is hot water available in this room a person with limited sensation in their lower limbs could burn themselves by contacting the hot drain line if hot water was in use at the lavatory. The entry door to this rest room is also too narrow to comply with current accessibility requirements. This rest room could be used by a visually impaired person who does not have mobility impairments, but not by a visually impaired person who is in a wheelchair. Note that the accessible unisex toilet Classroom Rest Room #1 has an ISA sign. The simplest fix for this now would be to remove the circle

and triangle signs from this door and label the restroom as a “Non-accessible Unisex Toilet” with accessible signage with raised letters and Braille type.



## **SITE REVIEW**

### **Parking**

There are a number of accessibility issues related to parking as noted below:

1. The accessible parking stall striping is faded and not compliant with current standards.



2. There is a 1", non accessible, step at the ramp leading to the Classroom Building from the accessible parking spaces near that building.



3. There is no signage at each accessible stall indicating the \$250 fine for parking in the space.
4. There is no accessible signage at the entry to the parking area stating that vehicles parking in designated accessible spaces are subject to towing.
5. The grades in the accessible parking stalls and the path of travel to and from them should be field verified to be less than 2% cross slopes and 5% longitudinal slopes in the area of travel for persons with disabilities.

### Stairs and Rails

Stair railings are not compliant with current accessibility or egress standards. There are no extensions of the railings at the top and bottom as is required for access for visually impaired persons. The handrails at the rear of the stage are too large in diameter to meet current graspability requirements for both egress standards and accessibility.



There is a step at a door into the stage area which does not have a landing associated with it. The stair risers at the steps around the stage in the Main Building are too high to be compliant with current standards of 7" maximum rise.



### Toilet Rooms

Men's and Women's Toilets Number 2 at the main building have been retrofitted to make them more accessible. They are both deficient in minor ways regarding compliance with current accessibility requirements. While some of the noted deficiencies may render the rooms only

partially accessible none of the deficiencies rise to the level of being hazardous to users of the toilet rooms.



Among the deficiencies noted are:

#### Men's Toilet Room 2

1. The rest room should have a sign next to the strike side with raised and Braille lettering.
2. The lowered urinal is 18" to the rim. The proper accessible dimension is 17" maximum to the rim.

#### Women's Toilet Room 2

1. The rest room should have a sign next to the strike side with raised and Braille lettering.
2. There does not appear to be enough clearance outside the toilet stall to inscribe a 5' diameter turning circle in the toilet room outside of the toilet stall. There is probably sufficient maneuvering room for practical accessibility.

The drinking fountains in the lobby outside the toilet rooms do not have hi-lo facilities as would be required under current access standards.



Rest Rooms 3 and 4 in the Classroom Building are unaltered existing rest rooms and are thus not accessible in any way as they were built prior to the existence of any accessibility standards. The accessible facility for the Classroom Building is the single essentially code-complaint unisex

Rest Room 1 outside the F.A.H.S. room. As noted above Rest Room 2 is deficient enough to not be considered accessible.

### Accessible Path of Travel and Means of Egress

Door 3 at the Main Building has an altered threshold to be accessible and has an International Symbol of Accessibility (ISA) on the door. The door closer is above the required maximum of 5 pounds of operating pressure, but could easily be adjusted to meet that standard. There is not adequate signage from the public approach to the building from the parking lot to direct persons with disabilities to the accessible entry door.



The door opening force should be set at 5 pounds maximum for doors which are to be considered accessible. This is often a maintenance issue for exterior doors which may be blown open by high winds. I recommend that the only exterior door to be set with this opening force be the door identified with the International Symbol of Accessibility at the east side of the Main Building Foyer. See Tier 2 options for a discussion of alternative ways to address door opening pressures.

The other doors into the Main Building have old panic hardware, which appeared to be operational. The sills are too high to be considered accessible, except at the Foyer Door noted above which has been remediated with a sill plate attachment.



### Signage

If it is desired to make the room identification signage on the site accessible to persons with disabilities each room with permanent room identification, such as toilet rooms or assigned offices, should have a sign next to the door with raised and Braille lettering for access by visually impaired persons. As noted above this signage would be voluntary now, but would be required in the area of alteration if new work is done under a building permit. See the illustration of the two accessible rest rooms in the Main Building for an example of where required signage is present on the toilet room doors but not provided at the pull side edge of the door on the adjacent wall.

### Tier 2 Items

The items below are things I recommend be considered independent or other renovation work related to program changes. This list could also serve as a prioritized list to accompany other program-related new work. Note that the accessibility items noted below are not required unless accompanied by alteration work or new construction. The accessibility items are prioritized in path of travel order from the outside of the facility leading into the buildings.

1. Repair step in path of travel near accessible parking for the Classroom Building
2. Restripe accessible parking stalls and repave as necessary to assure proper slopes at path of travel.
3. Provide code-compliant signage at parking lot entry and at accessible parking stalls.
4. Provide signage from parking area to accessible entry at the foyer.
5. Provide an accessible entry to the F.A.H.S. room with signage from the parking area
6. Provide accessible signage at rooms with permanent identification or permanently assigned uses such as; rest rooms, the minister's office and the main office.
7. Provide sill step mitigation and ISA at any doors identified as being desirable for disabled access, similar to provisions made at the existing accessible door to the Foyer.

8. Retrofit the aging and possible poorly functioning panic hardware at the main Social Hall.
9. Retrofit the non-accessible unisex toilet room Rest Room 2 at the Classroom Building with grab bars and insulated piping, remove floor mounted urinal to increase maneuvering room in this room and re-sign accordingly once the work is completed.
10. Consider providing power operators at accessible doors. This would require new power provisions to the door operators, but would allow the closers to be set with pressures high enough to keep doors closed in windy conditions.
11. Consider converting the two small toilet rooms M-1 and W-1 near the Foyer into two unisex accessible facilities. This should be carefully considered against toilet use during peak use periods as this will reduce the fixture count for patrons and will increase wait times during peak use periods. Also, the existing accessible rest rooms serve the Main Building now, so retrofit of these rest rooms is not necessary to provide accessible facilities in the Main Building.
12. Retrofit exit signs at the assembly spaces, such as the main Social Hall, Library, and all of the classrooms and assembly spaces in the Classroom Building to be self illuminated so they will be visible in a power failure. Provide minimal battery-powered emergency egress lighting at the large assembly spaces if feasible with the electrical system.
13. Consider retrofitting the stair railings in the stage area of the Social Hall to be code compliant with egress and access requirements.
14. Consider sprinklering the facility even if no other alterations or additional buildings are contemplated. See the rationale for installing sprinklers in the Tier 3 discussion below.

### **Tier 3 Considerations for New Buildings and Major Alterations**

Both alterations to existing facilities and new facilities will need to be compliant with the CBC edition in effect at the time of permitting and construction. As noted above in the description for provision of accessibility some work may be required outside of an area of alteration to provide an accessible path of travel to the area of alteration. Whether related to new construction or alterations, site work would need to be done to bring the parking lot into compliance with accessibility requirements. Also any pathways from the accessible parking area to the new building or to an area of alteration would need to meet the CBC.

### **Means of Egress**

Any alterations to existing facilities and new facilities will need to be compliant with the CBC edition in effect at the time of permitting and construction. Alterations may trigger door size adjustments in the means of egress since many of the doors are too narrow to comply with either egress or access requirements. Doors basically need to be 3'-0" wide to meet the 32 inch clearance requirements in the CBC. As noted above there is no requirement to upgrade any of the egress system as it now exists, assuming it was code compliant at the time it was constructed, unless remodeling work is done to impact the means of egress system.

## **Fire Sprinklers**

It should be assumed that any new facilities built under the 07CBC, or the new 2010 California Building Code that goes into effect on January 1, 2011 will be sprinklered. Thus a new water service of adequate size to serve the sprinklers will need to be supplied from the street to the building site if new buildings are built on site or significant additions are made to the existing facilities. A substantial addition to a building could trigger sprinklering the entire building. A separate new building will require sprinklers, but only in the new building. We recommend that even if a separate new building is considered, which would not require sprinklers in the unaltered portions of the existing facilities that strong consideration be given to sprinklering the entire facility now. While adding sprinklers would cause interruption of use of parts of the building as they are added and may be a visual issue, sprinklers provide a high level of property protection as well as life safety. The building sits back on the site, remote from the adjacent roadways and could be subject to vandalism and perhaps fires related to vandalism. Sprinklers will provide a high degree of protection for the facility to prevent total building loss in a fire.