



To: Office of the Deputy Mayor for Planning & Economic Development

From: District of Columbia Office of Disability Rights
Alexis Taylor, Director
Anwar Mahmood, Architect

Re: Accessibility Survey Report:
IN3-At Howard University
2301 Georgia Ave. NW
Suite D
Washington, DC

Date: April 11, 2017

I. OVERVIEW

The Americans with Disabilities Act (ADA) is a civil rights law that mandates equal opportunity for individuals with disabilities. The ADA prohibits discrimination in access to jobs, public accommodations, government services, public transportation, and telecommunications.

Under ADA Title II, any grantee of government funds assumes the government's obligation to comply with the law. When government funds are utilized entity to renovate or make substantial alterations to an existing building, the government or its grantee must also ensure that the altered portions are accessible.

The ADA Architectural Guidelines state specifically: "Alterations to primary function areas (where major activities take place) trigger a "path of travel" requirement, that is, a requirement to make the path of travel from the entrance to the altered area -- and telephones, restrooms, and drinking fountains serving the altered area -- accessible (§4.1.6(2)). The only instance where these alterations would not be required is where it is "technically infeasible." According to the US Department of Justice, cost is not a factor in the analysis as to whether an alteration is technically infeasible.

Below ODR has outlined accessibility issues highlighted in the path of travel for the newly renovated IN3.

Following are the issues and proposed solutions:

II. PROTRUDING OBJECTS-SIDEWALKS

- **ISSUE(S):** A *Siamese Connection* installed 34" above finished floor (AFF) of the path of travel is protruding 6 1/2" into the sidewalk / accessible path of travel. This is not detectable by a person with low vision / white cane user.
- **SOLUTION(S):** This *Siamese connection* needs to be removed and reinstalled at a height of not more than 27" above finished floor. *Please refer to 2010 ADA Standards by DOJ Sections and Subsections 307 and figures 307.2 and 307.3.*

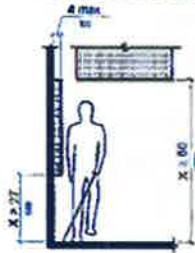


Figure 307.2
Limits of Protruding Objects

III. MAIN ENTRANCE TO BUILDING/VESTIBULE INTERIOR DOORS

- **ISSUE(S):** The main entrance vestibule interior doors (both entry and exit) are too heavy to operate. They require a force of 11 lbs. to 13 lbs. to operate, which is not permissible by ADA Standards.



- **SOLUTION(S):** Auto Door Openers may be installed to render these doors accessible. In addition, it is noted that the interior vestibule doors are too heavy / tight. These need to be mechanically adjusted to allow the opening of the doors with a force not to exceed 5 lbs. Until this is done, we would suggest that a staff member be stationed close to the door and to open the door for constituents who need assistance. *Please refer to 2010 ADA Standards by DOJ Sections and Subsections 404.2.9. and 404.2.8.1*

IV. INACCESSIBLE ROUTE TO DINETTE/KITCHENETTE and INACCESSIBLE WALL CABINETS.

- **ISSUE(S): Inaccessible Route:** There are two corridors leading to the kitchenette which have two steps. The level difference is about 11" on each side. This area cannot be accessed by a wheelchair user.

SOLUTION(S): Based on the existing building condition, it seems difficult to incorporate a ramp or a chair lift in the corridors. The only feasible solution seems to be to redesign the space and to relocate the dinette elsewhere (at an accessible location). *Please refer to 2010 ADA Standards by DOJ Sections and Subsections 404.2.4.4*



- **ISSUE(S): Inaccessible Wall Cabinets in Kitchenette:** The kitchenette has wall cabinets with lowest shelf at 61" AFF.

SOLUTION(S): At least 50% of the wall shelving needs to be lowered as per ADA Standards. Until this is done, we suggest that you consider having the cabinet items in a rolling "island" or other portable accessible structure. Ascertain that any added structure does not block the path of travel or present additional accessibility concerns. *Please refer to 2010 ADA Standards by DOJ Sections and Subsections 804 and 804.5.*

V. MEN AND WOMEN'S RESTROOMS

- **ISSUE(S): Men's Designated Accessible Restroom:** The restroom door was too heavy to operate. It required a force of 15 lbs. to operate.

SOLUTION(S): The provided restroom door is too heavy / tight. This needs to be mechanically adjusted to allow the opening of the door with a force not to exceed 5 lbs. *Please refer to 2010 ADA Standards by DOJ Sections and Subsections 404.2.9. and 404.2.8.1*

- **ISSUE(S): Men's General Restroom.**

1. No accessible urinal is provided.
2. Clear Space between side panels on Urinals is varying from 29" onward.
3. Lip of the Urinals is installed at 24" AFF.
4. No accessible toilet stall is provided.
5. There is no turn around space provided in the restroom.
6. A temporary signage is provided which does not have Braille.
7. Doors too heavy to operate.

SOLUTION(S): Although an ADA Compliant/Designated Accessible restroom is provided close by, it is still suggested that changes be made for compliance with the International Building Code requirements.

It is further suggested that the restroom may be redesigned to be accessible. This can be effectuated by providing an accessible toilet stall and an accessible urinal stall. Accessible features can be incorporated only with a complete redesign of the restroom area.

- **ISSUE(S): Women's Designated Accessible Restroom:** The restroom door was too heavy to operate. This required a force of 15 lbs. to operate.

SOLUTION(S): Again, the restroom door is too heavy / tight. This needs to be mechanically adjusted to allow the opening of the door with a force not to exceed 5 lbs. *Please refer to 2010 ADA Standards by DOJ Sections and Subsections 404.2.9. and 404.2.8.1*

- **ISSUE(S): Women's General Restroom.**

1. No accessible toilet stall is provided.
2. There is no turn around space provided in the restroom.
3. A temporary signage is provided which does not have Braille.
4. Doors too heavy to operate.

SOLUTION(S): Although an ADA Compliant/Designated Accessible restroom is provided close by, it is still suggested that changes be made for compliance with the International Building Code requirements.

It is further suggested that the restroom may be redesigned to be accessible. This can be effectuated by providing an accessible toilet stall and an accessible urinal stall. Accessible features can be incorporated only with a complete redesign of the restroom area.

- **ISSUE(S): Men and Women Restrooms Signage:** Only temporary paper signage is provided which does not incorporate Braille and is inaccessible.

SOLUTION(S): As the facility is still in the finishing stages, it would be reasonable to install permanent signage at the proper height and with Braille. *Please refer to 2010 ADA Standards by DOJ Section 703.*

VI. WALL MOUNTED TV MONITORS:



- **ISSUE(S):** Quite a few wall-mounted TV monitors are installed at varying heights and protruding 6 plus inches from the wall. These objects are not detectable by a person with low vision / white cane user (*thereby posing a safety risk*).

SOLUTION(S): The TV monitors need to be reinstalled at locations which do not fall in the path of travel. When possible, placing an object under the television (*ie.* a table, large potted plants, or another item) could temporarily address the problem. Please note the width of the path of travel must still be greater than 32" with the object there. *Please refer to 2010 ADA Standards by DOJ Sections and Subsections 307 and figures 307.2 and 307.3.*

VII. CENTRAL CORRIDOR LEVEL DIFFERENCE

- **ISSUES:** The two corridors running parallel to each other have a level difference of 6 inches. This is a significant safety issue as well as an ADA concern. A wheelchair user can flip from the chair since there is no protection.
SOLUTIONS: It is proposed to install a guard rail running the full length of the hazardous areas. We would suggest using edge protection. *Please refer to 2010 ADA Standards by DOJ Section 405.9.*

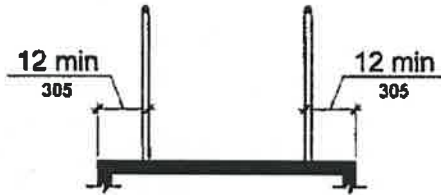


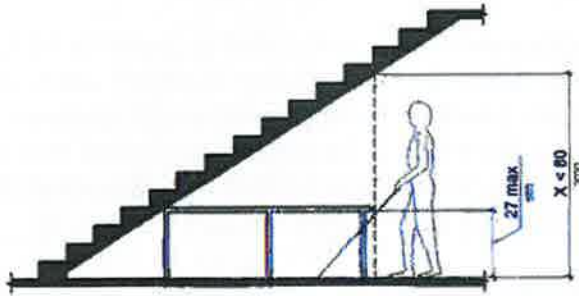
Figure 405.9.1
Extended Floor or Ground Surface Edge
Protection

VIII. STAIRCASES



- **ISSUE(S): Yellow Staircases:** Both staircases are not ADA compliant for the following reasons:
 1. The lack of handrail extensions.
 2. The top landing on the front staircase has sloped surface (8.7%).
 3. The underside of both staircases is unprotected and hazardous for a white cane user due to vertical clearance requirements.

SOLUTION(S): *Please refer to 2010 ADA Standards by DOJ Section 307.4, 504 and 505.* For Stairways and handrails modifications.



**Figure 307.4
Vertical Clearance**

IX. ELECTRICAL PANELS A & B



- **ISSUE(S):** The electrical panels have the following problems:
 1. These panels are installed in the corridor adjacent to each other.
 2. Panel A is installed 33" AFF and protruding 6" into the corridor.
 3. Panel B is installed 40" AFF and protruding 4 ½" into the corridor.
 4. These features are inaccessible as protruding objects.

SOLUTIONS: The panels need to be reworked so as to render it "cane-detectable" (*A blind constituent with a white cane*). Please refer to 2010 ADA Standards by DOJ Sections and Subsections 307 and figures 307.2 and 307.3.

ODR would welcome any further technical assistance or comments in the matter.