



# JRT•AIA ARCHITECT

741 Upper Straw Road • Hopkinton, NH 03229-2041 • 603.223.9938 • jrtaia@aol.com  
Architecture • Interior Design • Planning • Certified Construction Specifier  
Code Consultant • Third Party Plan Reviews • Accessibility Reviews and Inspections  
<http://www.aianh.org/users/jrt-aia-architect>

## MEMORANDUM

c:\projects\watervilleestates-ada\memo 012915.docx

**DATE:** January 29, 2015

**TO:** Corey Smith, General Manager  
Waterville Estates

**FROM:** Jerry R. Tepe, FAIA

**SUBJECT:** Americans with Disabilities Act (ADA) Assessment  
Waterville Estates, Campton, New Hampshire

---

The following is an assessment of compliance with the *2010 ADA Standards for Accessible Design* as part of the Americans with Disabilities Act (ADA) based on a visit January 20, 2015 accompanied by Corey Smith, General Manager of Waterville Estates. Buildings reviewed included the Community Center and surrounding facilities such as parking and swimming pools and the Ski Lodge and associated parking. This assessment can form a part of the self-evaluation and transition plan, but does not address the program accessibility issues other than the physical building portion.

As a unit of public government, Waterville Estates is subject to Title II (State and Local Government) of the ADA, 28 CFR Part 35, and as such has the primary duty to provide program accessibility, e.g. programs when viewed in their entirety must be readily accessible to and usable by people with disabilities. The term "program" includes all amenities and services provided to those without disabilities. Therefore the existing buildings would not require physical alterations as long as program accessibility is attained. However, any additions and/or alterations would be required to comply with the technical requirements of the *2010 ADA Standards*.

One requirement of Title II entities with more than 50 employees is to designate an ADA Coordinator; this is a recommendation for smaller entities. The coordinator would be responsible for, among other things, overseeing a self-evaluation and transition plan, handling requests for auxiliary aids and services, providing information about accessible

programs and services and serving as the local resource for ADA compliance. They may also receive complaints of non-compliance from the public and work to resolve them.

All Title II entity public meetings must be held in an accessible location. If, for some reason, a meeting is not in an accessible location and a person with disabilities attends, the meeting must immediately be cancelled or relocated. This does not require advanced notice. Notice of public meetings can request reasonable advance notice for auxiliary aids or services such as assistive listening devices or sign language interpreters. While not a requirement to provide in advance, it is a good practice to have at least one copy of any public handouts, such as agendas, available in large print format; 18 pt. san-serif or 20 pt. serif font.

Although Title II entities only need to provide program accessibility, this assessment looks at the prescriptive requirements of the *2010 ADA Standards*. The assessment is for compliance with the primary objectives of the ADA; mainly entrance into the building(s), access to the primary function(s) and services and toilet facilities. Secondary accessible elements are, in general, not examined for compliance. While a few dimensions were taken, no detailed verification of dimensions, slopes, clearances, etc. were performed during this limited visit. This is left to the owner to verify or would require a longer and more detailed visit.

Throughout this memo various sections, tables, diagrams, etc. from the *2010 ADA Standards* are cited. Rather than copy and include them into this memo, the entire *2010 ADA Standards* can be downloaded, at no cost, from the ADA website (refer to resources at the end of this memo). Cited items can be found within this document for further information and guidance.

In no particular order, the following was noted:

### **Ski Lodge:**

1. The Ski Lodge assessment is simple; the building is not accessible. None of the major elements are in compliance from the entrance to circulation throughout the building to the toilet facilities.
  - a. Mr. Smith indicated the plan was to provide a ramp compliant with §405 to the main level and then to provide accessible toilet facilities on that level per Chapter 6. A note to assure the new entrance door(s) comply with §404.
2. Due to the snow/ice covering the parking area, it was impossible to determine the total number of parking spaces provided or the number of accessible spaces provided to determine compliance with Table 208.2.

3. Due to the snow/ice covering the parking area, it was impossible to determine if the accessible space(s) complied with the proper markings and spacing per §502.2 and §502.3.
4. Due to the snow/ice covering the parking area, it was impossible to determine if a space was designated as van accessible (no sign indicated this) per §502.2. A minimum of one (1) van accessible space is required per §208.2.4.
5. There is a sign indicating accessible parking, but it is not mounted correctly (60 inches minimum to bottom of sign) per §502.6. There was no sign indicating van accessible parking.
6. Due to snow/ice covering the parking area, it was impossible to determine if the parking space(s) and access aisle(s) complied with the maximum slope (1:48) requirements of §502.4.
7. A section of the service counter was properly located to provide accessible services per §904.
8. There were tables that appeared to be accessible per §902. A minimum of 5% of total tables shall be designated or available as accessible per §226:
9. An accessible path (36 inches wide) needs to be provided/maintained between designated accessible tables and the service counter and to/from the entrance and toilet facilities per §403.5.
10. Signage indicating accessible entrance, accessible toilets, accessible tables and service counters is required per §216 and §703 and the various sections specific to those elements.

### **Community Center:**

1. The Community Center is a multi-story building with no internal accessible route per §206. The main level is currently accessible from the parking area. All other levels except the uppermost level can be accessed at grade with no or minor alterations. As other alterations are performed to areas of primary function(s) and services, an accessible route shall be provided to these areas per §202.4.

- a. The uppermost level contains only offices and meeting rooms. When required, the programs/services provided in this area can be provided on an accessible level.
  - b. Future contemplated parking and accessible routes shall comply with §303, §403, §405 and §502 as applicable. Signs directing persons to accessible entrances are required per §216.
2. Due to the snow/ice covering the parking area, it was impossible to determine the total number of parking spaces provided or the number of accessible spaces provided to determine compliance with Table 208.2.
3. Due to the snow/ice covering the parking area, it was impossible to determine if the accessible space(s) complied with the proper markings and spacing per §502.2 and §502.3.
4. Due to the snow/ice covering the parking area, it was impossible to determine if a space was designated as van accessible (no sign indicated this) per §502.2. A minimum of one (1) van accessible space is required per §208.2.4.
5. There is a sign indicating accessible parking, but it is not mounted correctly (60 inches minimum to bottom of sign) per §502.6. There was no sign indicating van accessible parking.
6. Due to snow/ice covering the parking area, it was impossible to determine if the parking space(s) and access aisle(s) complied with the maximum slope (1:48) requirements of §502.4.
7. At the main entrance a pavement "hump" has been created to facilitate drainage. This "hump" however creates non-compliance with the accessible route per §303 and §403.
8. The walkway from the parking area to the main entrance visually appeared to comply with a maximum slope of 1:20 and a maximum cross-slope of 1:48. This should be verified when conditions permit. If the slope exceeds 1:20, the walkway would be considered a ramp (up to a slope of 1:12) and comply with §405 including the addition of handrails.
9. The main reception counter does not comply with §904.
  - a. An alternative approach would be to provide a separate table that complies with §902 adjacent to the counter.

- b. The rear of the reception counter is considered an employee work area and subject only to Title I (Employment) of the ADA.
10. In general, many doors do not have compliant door hardware; there are knobs or thumb latches and not lever or other style handles to comply with §404.2.7. Closing speed and opening force where closers are provided was not checked for compliance with §404.2.8 and §404.2.9.
  - a. Not all doors were examined for maneuvering clearances per §404.2.4, although there were none noted as being in major non-compliance.
11. Numerous doorways had changes in elevation and/or thresholds that did not comply with §303 and/or §404.2.5.
12. In the Mountain View Lounge there are no accessible tables complying with §902. A minimum of 5% of total tables shall be designated or available as accessible per §226.
  - a. We discussed the additional alteration of the bar area access by lowering the access flap to comply with §904. This also applies to the bar in the main function room.
13. The exterior deck adjacent to the Mountain View Lounge is not accessible due to a step down.
14. The horseshoe recreation area is not on an accessible route per §206.
15. None of the swimming pools or spas/hot tubs are accessible per §1009.
  - a. If the pool is <300 lf perimeter, a pool lift per §1009.2 or sloped entry per §1009.3 is required (for existing pools, the lift is really the only alternative).
  - b. For pools >300 lf perimeter a lift or sloped entry and at least one other accessible means of entry, such as a transfer wall, per §1009.4, §1009.5 or §1009.6 is required per §242.
  - c. Spas/hot tubs require at least one accessible means of entry per §1009.2, §1009.4 or §1009.5.
16. Due to the snow/ice covering the area surrounding the exterior pools, it was impossible to determine if the decks and associated facilities are in compliance.
17. The two public toilet rooms on the main and pool level are very similar in design; the difference being in the number of fixtures. These were recently renovated and therefore are more in compliance than other areas, but there are still deficiencies.

- a. At least one of the accessible toilet stalls is approximately 1-inch short of the required width of 60 inches per §604.3.1.
  - b. None of the accessible toilet stalls have grab bars per §604.5.
    - i. Note the NH Building Code also requires a vertical grab bar to the side of the water closet; the ADA does not.
    - ii. Installing the grab bars will require relocating the toilet tissue dispensers to be mounted per §604.7.
  - c. Doors to all accessible toilet compartment should have a pull handle on the room side per §604.8.1.2.
  - d. The male toilet that has two urinals does not have one mounted at 17 inches (max.) per §605.2.
  - e. In all rooms the lavatory counter height complies with §606.3 but the lavatories themselves do not.
    - i. After replacing the lavatories, the height to the bottom of the mirror should be verified for compliance per §603.3.
  - f. In all rooms the under-counter piping is not protected per §606.5.
  - g. The doorway to all rooms does not provide the required 32 inches clear width per §404.2.3.
  - h. The thresholds to the toilet rooms were not in compliance with §303 and/or §404.2.5.
18. The portion of the hallway providing access to the indoor pool is sloped. A rough measurement indicates this ramp complies with §405 for length and slope; this should be verified with more accurate measurements.
  - a. The ramp does not have handrails on both sides per §405.8.
19. The stairs from the main lobby to the upper level have open risers which is not permitted per §504.3.
20. All stairways do not have compliant handrails per §505, including size, profile and extensions at top and bottom.
21. The locker rooms on the lowest level and associated toilet and shower rooms are not compliant with §603, §604, §605, §606, §608 and §903.
22. The family changing room on the pool level and associated toilets and showers are not compliant with §603, §604, §605, §606, §608 and §903.
  - a. This area is proposed for renovation and will be used to provide accessible facilities including toilets, showers and lockers.

23. The exercise room will require a minimal relocation of equipment to provide a clear width of 36 inches (can be reduced to 32 inches for a length not to exceed 24 inches) to at least one of each type of equipment per §403.5.1.
24. Two drinking fountains noted are mounted at wheelchair height; none are provided for standing persons per §602.7.
25. On the upperdeck, the exterior food service counter was not in compliance with §904.
26. There is almost no accessible signage throughout the building. Signs are required per §216. Signage, including raised lettering and braille (and pictograms where applicable) must comply with §703 and installed per §703.4.

### **Resources:**

2010 ADA Standards for Accessible Design:

[http://www.ada.gov/2010ADASTandards\\_index.htm](http://www.ada.gov/2010ADASTandards_index.htm)

ADA Technical Assistance:

1-800-949-4232

[adainfo@newenglandada.org](mailto:adainfo@newenglandada.org)

NH Governor's Commission on Disabilities:

1-800-852-3405

603-271-2773

<http://www.nh.gov/disability/>

