



November 23, 2020

Via Email only

The Hon. Barbara Palmer, Director
Agency for Persons with Disabilities
4030 Esplanade Way
Tallahassee, FL 32399-0950
BARBARA.PALMER@APDCARES.ORG

Re: Rish Park Advocates for Accessibility
Concerns for Further Discussion and Resolution

Dear Director Palmer:

We appreciate your staff entertaining our group with an initial conversation and discussion on November 13, 2020 via conference call to discuss the construction currently underway at the State of Florida William J. (Billy Joe) Rish Park dedicated to serving individuals with disabilities. As requested by your staff, our group (now being referred to as the Rish Park Advocates for Accessibility and spearheaded through the Family Network on Disabilities), had committed to provide a letter by November 20, 2020, to your agency outlining some initial concerns related to accessibility at Rish Park with a focus on ensuring compliance with the Americans with Disabilities Act (ADA) and maximizing access given the intent of the facility, and this letter is intended to fulfill that request to extent we are able.

Our group noted on the call that we would like to provide meaningful comments to support the on-going renovations necessitated by Hurricane Michael in 2018 and, to do so, we would need access to drawings of the renovations. Without those drawings, our comments would be based on limited resources such as Google Earth and information from recent visitors to the facility. Once the renovations are complete and the facility is open to the public, the Park's level of access will become apparent, albeit too late to provide meaningful comment on work that has yet to be completed as of this date.

With the intent to provide meaningful comment by November 20, one member of our group sent an email to your staff requesting the drawings on November 13, and another member group requested copies of the APD Agency Self-Evaluation and Transition Plan (per 28 CFR 35.105, 35.150) specific to Rish Park on November 16. APD attorney Brett Taylor from your agency responded to both emails acknowledging the requests but has not yet provided any information in response.

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Our group wants to work with APD to ensure that Rish Park is fully ADA-compliant and to maximize accessibility given the intent of the Park. Because we have not received further responses to our requests, we are providing some very preliminary comments, clearly conceptual at this point and limited to information that is currently available to us. Of course, we will all eventually have access to the park, and the limited extent of the comments we can make currently to address the renovations in contrast to the reality of the actual renovations and any lack of compliance with the ADA will then be revealed.

Attachment A includes concerns related to compliance with the 2010 ADA Design Standards and Attachment B addresses additional improvements that could be made. The design elements addressed in these attachments will affect the Park's accessibility for its users who have a wide variety of disabilities. Some of these issues were brought to APD's attention by the Family Network on Disabilities by letter dated September 10, 2020. APD's initial responses were sent by letter dated October 1, 2020. Both of these letters are included for reference as Attachment C.

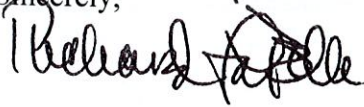
As you know, Florida Statute 553.503 adopts and incorporates federal ADA Standards for Accessible Design and related regulations provided in 28 CFR Part 35 (2010 ADA Design Standards). These standards are also reflected in the Florida Accessibility Code for Building Construction. New construction and alterations after March 15, 2012, such as the current construction being undertaken or recently completed at Rish Park, must comply with the 2010 Standards. We are therefore providing comments based on compliance with the 2010 ADA Standards. In addition to details from the 2010 Standards, we have noted relevant Department of Justice (DOJ) recommendations which, given the intended function of the facility for the benefit of persons with disabilities, should be taken into account.

Attachment A focuses on design elements within Rish Park that do not appear to be in compliance with the 2010 ADA Standards and is quite conceptual at this point. In Attachment B, we have identified a few design elements where improvements could be made for greater accessibility beyond the minimum ADA requirements. These two lists are both very preliminary given the lack of access to the design drawings and to the facility.

While the APD has directed significant funds for the much-needed renovations, reconstruction, and alterations of Rish Park, and has made a number of changes that are not related to accessibility at all (e.g., shaded rest areas along the boardwalk), the intent of our discussions and support is to ensure that the maximum value is obtained from the allotted funds. Certain items, such as ADA-compliant parking (see Item #1 in Attachment A) and fully accessible bathrooms and kitchens, are of paramount concern and need to be addressed immediately by APD, including possible retrofits to the already reconstructed family cabin.

We look forward to providing meaningful comments following receipt of the requested documentation and to working with APD to make Rish Park a national treasure for the disabled community. We would like to schedule a follow-up meeting with a smaller group of attendees within the next week or so to address the issues included in Attachment A, at a minimum. Please let us know your availability.

Sincerely,



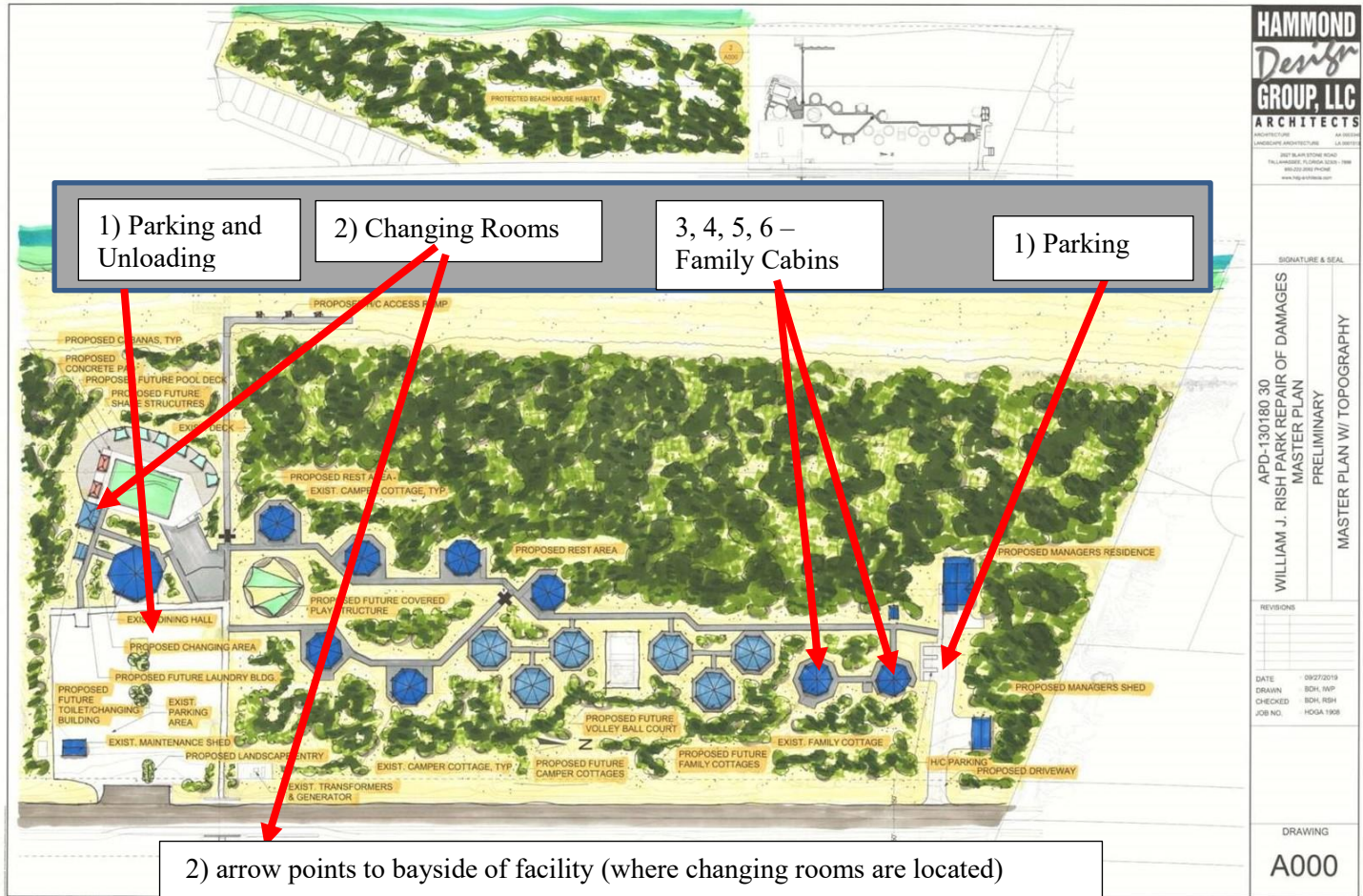
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ATTACHMENT A

Rish Park Advocates for Accessibility

The Rish Park Advocates for Accessibility have preliminarily identified some design features within the Park which we would like to discuss further with APD to help ensure that the requirements of the Americans with Disabilities Act are being met. We understand that Hammond Design Group LLC is the current architect designing and implementing the renovations. We found the following diagram on Hammond's website and added labels to correspond to the six main areas of focus.



- 1) Parking and Passenger Unloading
- 2) Changing Rooms
- 3) Family Cabin Bathroom
- 4) Family Cabin Kitchens
- 5) Family Cabin Bedrooms
- 6) Family Cabin Open Spaces/Living Area

Applicable Standards

Florida Statute 553.503 adopts and incorporates federal Americans with Disabilities Act Standards for

Accessible Design, and related regulations (ADA code) provided in 28 CFR Part 35 into Florida Accessibility Code for Building Construction. Notably for new construction and alterations after March 15, 2012, such as the current renovations at Rish Park, 28 CFR 35.151(c)(3) requires the construction and alterations to comply with the 2010 standards.

For each of the six areas, we have stated our concerns and noted the applicable 2010 ADA Design Standards. Some of these issues were raised in a letter to the APD dated September 10, 2020. Where appropriate, we have highlighted in yellow the APD responses from Tom Rice's October 1, 2020 letter.

We appreciate APD's commitment, noted below, to compliance with the Florida Building Code and the Florida Accessibility Code, and therefore to the 2010 ADA Design Standards. We take issue with the statement that all of the requirements have been strictly adhered to, and we wish to discuss this further with the appropriate APD and Department of Management Services representatives. We are not familiar with the Gulf County Building Association or its relevance in reviewing the project designs. None of the agencies has provided any type of certification that the Park is in compliance with the applicable ADA Design Standards.

APD Statement in October 1, 2020 response letter:

All requirements from both the Florida Building Code and Florida Accessibility Code (2017) have been strictly adhered to during renovations and repairs to the park. In addition, the project designs were reviewed and subsequently approved by the Gulf County Building Association, Department of Management Services, and the Agency. That being said, we share your desire to create an environment which exceeds minimum accessibility standards wherever possible and within available funding.

We are very happy to hear that APD shares our desire to "create an environment which exceeds minimum standards wherever possible." To the extent that funding is an issue, we would appreciate information that APD has developed regarding those costs, and their relationship to the entire budget for Rish Park.

New Construction and Alterations

As noted above, Florida Statute 553.503 incorporates by reference 28 CFR 35. Within that CFR, 28 CFR 35.151(c)(3) (noted in red font below) confirms that the current construction work being undertaken at Rish Park should be deemed as new construction or alterations and should be in fully compliance with the 2010 ADA Design Standards.

Existing Structures

Comments on existing structures (pre-2012) are beyond the scope of this document. However, the Rish Park Advocates for Accessibility have requested copies of the federally mandated self-audit of ADA compliance and the associated transition plan for removing barriers to access. APD should be taking into account the entirety of the Park when considering ADA compliance requirements.

Excerpts from Florida and Federal Statutes and Rules:

State (which adopts and incorporates federal law):

553.503, Florida Statutes. Adoption of federal standards.—Subject to modifications under this part, the federal Americans with Disabilities Act Standards for Accessible Design, and related regulations provided in **28 C.F.R. parts 35** and 36 and 49 C.F.R. part 37, are hereby adopted and incorporated by reference as the law of this state and shall be incorporated into the Florida Accessibility Code for Building Construction and adopted by the Florida Building Commission in

accordance with chapter 120. **History.**—s. 1, ch. 93-183; s. 2, ch. 97-76; s. 65, ch. 2000-141; s. 59, ch. 2000-154; s. 22, ch. 2011-222.

Federal:

28 C.F.R. 35.151 New Construction and Alterations

(a) *Design and construction.*

(1) Each [facility](#) or part of a [facility](#) constructed by, on behalf of, or for the use of a [public entity](#) shall be designed and constructed in such manner that the [facility](#) or part of the [facility](#) is readily accessible to and usable by individuals with disabilities, if the construction was commenced after January 26, 1992.

...

(b) *Alterations.*

(1) Each [facility](#) or part of a [facility](#) altered by, on behalf of, or for the use of a [public entity](#) in a manner that affects or could affect the usability of the [facility](#) or part of the [facility](#) shall, to the maximum extent feasible, be altered in such manner that the altered portion of the [facility](#) is readily accessible to and usable by individuals with disabilities, if the alteration was commenced after January 26, 1992.

(c) *Accessibility standards and compliance date.*

(3) If physical construction or alterations commence on or after March 15, 2012, then new construction and alterations subject to this section shall comply with the 2010 Standards.

...

(5) *Noncomplying new construction and alterations.*

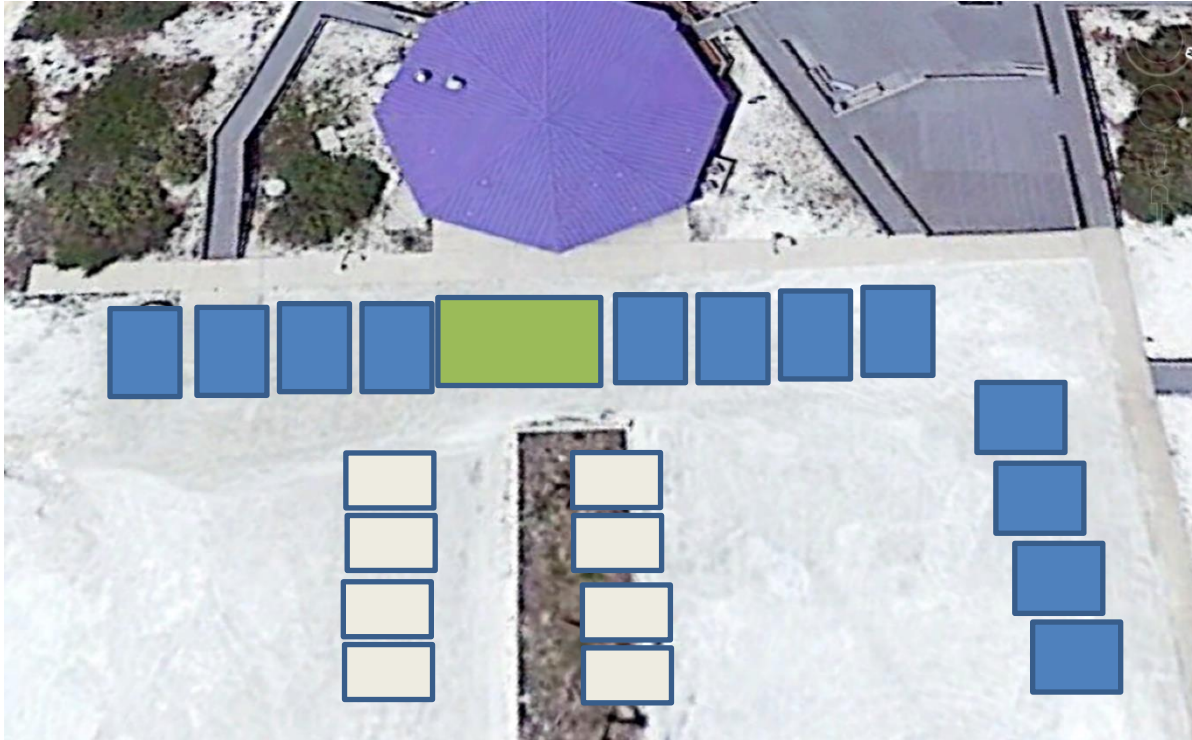
(i) Newly constructed or altered facilities or elements covered by [§§ 35.151\(a\)](#) or (b) that were constructed or altered before March 15, 2012, and that do not comply with the 1991 Standards or with UFAS shall before March 15, 2012, be made accessible in accordance with either the 1991 Standards, UFAS, or the 2010 Standards.

(ii) Newly constructed or altered facilities or elements covered by [§§ 35.151\(a\)](#) or (b) that were constructed or altered before March 15, 2012 and that do not comply with the 1991 Standards or with UFAS shall, on or after March 15, 2012, be made accessible in accordance with the 2010 Standards.

Item 1) – Parking and Passenger Unloading

A basic and fundamental function of the Park must be to provide accessible entry and designated, ADA-compliant parking spaces and an appropriate passenger unloading area. Accessible parking must be provided – near the main entrance and near the family cabins (i.e., north entrance). The spaces should be paved and appropriately marked. At least 12 spaces should be provided at the main entrance and four to six near the family cabins. These number may but given the unique functional focus of the facility, additional spaces should be provided. Also, an accessible passenger loading zone should be provided near the main entrance and near the family cabins.

The following image from Google Earth shows an overhead of the facility main parking lot from April 2019.



As the members of our group are well aware, the main parking lot today continues to not include ADA-compliant parking spaces. While FBC provides minimum requirements for required parking spaces at government community facilities (e.g., sport complexes, hospitals and rehabilitation facilities, etc.), our group recommends the above as a minimum to be designated as ADA-compliant parking spaces. While minimum requirements for handicap parking spaces (total and van-accessible handicapped) are typically based on a ratio of total required parking spaces, given how this particular facility is used and based on the requirements of Section 553.5041(4)(c), Florida Statutes (quoted below), all ADA-compliant parking spaces should be van-accessible and a sufficient number of spaces should be provided beyond the bare minimum. At least two to three spaces should be provided per family cabin, and another two to three spaces for each of the community cabins (16 to 24 spaces). An accessible passenger loading zone should also be provided near the main entrance and near the family cabins.

553.5041 Parking spaces for persons who have disabilities.—...

(4) The number of accessible parking spaces must comply with the parking requirements in s. 208 of the standards and the following:

... (c) The number of parking spaces for persons who have disabilities must be increased on the basis of demonstrated and documented need.

The above image shows a rough draft concept of layout for the locations (not including the parking lot at the north end of the Park) with dark blue van-accessible parking, green for an accessible loading zone, and light gray non-ADA compliant parking. Such design details as optimum traffic patterns, parking surface permeability (to meet coastal conservation needs), and distance minimizing for access can be discussed in a focus group.

ADA-compliant parking standards under Sections 502 and 503 are provided below. Note that the details of design are not found in the scoping section of the FBC standards.

2010 ADA Design Standards
502 Parking Spaces [REQUIREMENTS]

502.1 General. Car and van parking spaces shall comply with 502. Where parking spaces are marked with lines, width measurements of parking spaces and access aisles shall be made from the centerline of the markings.

502.2 Vehicle Spaces. Car parking spaces shall be 96 inches (2440 mm) wide minimum and van parking spaces shall be 132 inches (3350 mm) wide minimum, shall be marked to define the width, and shall have an adjacent access aisle complying with 502.3.

EXCEPTION: Van parking spaces shall be permitted to be 96 inches (2440 mm) wide minimum where the access aisle is 96 inches (2440 mm) wide minimum.

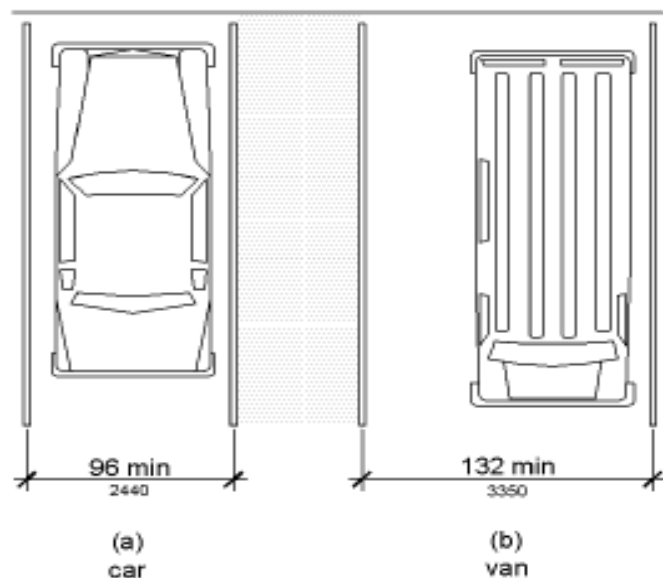


Figure 502.2 Vehicle Parking Spaces

502.3 Access Aisle. Access aisles serving parking spaces shall comply with 502.3. Access aisles shall adjoin an accessible route. Two parking spaces shall be permitted to share a common access aisle.

Advisory 502.3 Access Aisle. Accessible routes must connect parking spaces to accessible entrances. In parking facilities where the accessible route must cross vehicular traffic lanes, marked crossings enhance pedestrian safety, particularly for people using wheelchairs and other mobility aids. Where possible, it is preferable that the accessible route not pass behind parked vehicles.

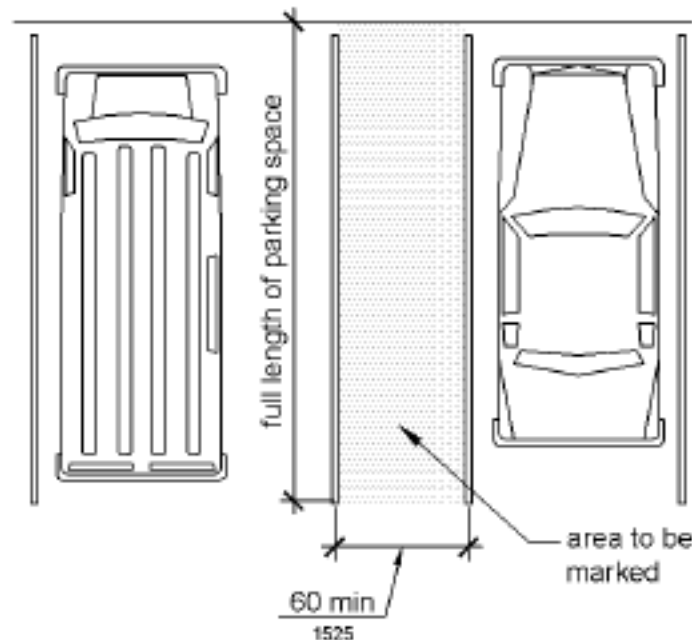


Figure 502.3 Parking Space Access Aisle

502.3.1 Width. Access aisles serving car and van parking spaces shall be 60 inches (1525 mm) wide minimum.

502.3.2 Length. Access aisles shall extend the full length of the parking spaces they serve.

502.3.3 Marking. Access aisles shall be marked so as to discourage parking in them.

502.3.4 Location. Access aisles shall not overlap the vehicular way. Access aisles shall be permitted to be placed on either side of the parking space except for angled van parking spaces which shall have access aisles located on the passenger side of the parking spaces.

Advisory 502.3.4 Location. Wheelchair lifts typically are installed on the passenger side of vans. Many drivers, especially those who operate vans, find it more difficult to back into parking spaces than to back out into comparatively unrestricted vehicular lanes. For this reason, where a van and car share an access aisle, consider locating the van space so that the access aisle is on the passenger side of the van space.

502.4 Floor or Ground Surfaces. Parking spaces and access aisles serving them shall comply with 302. Access aisles shall be at the same level as the parking spaces they serve. Changes in level are not permitted.

Advisory 502.4 Floor or Ground Surfaces. Access aisles 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. Built-up curb ramps are not permitted to project into access aisles and parking spaces because they would create slopes greater than 1:48.

502.5 Vertical Clearance. Parking spaces for vans and access aisles and vehicular routes serving them shall provide a vertical clearance of 98 inches (2490 mm) minimum.

502.6 Identification. Parking space identification signs shall include the International Symbol of Accessibility complying with 703.7.2.1. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches (1525 mm) minimum above the finish floor or ground surface measured to the bottom of the sign.

Advisory 502.6 Identification. The required "van accessible" designation is intended to be informative, not restrictive, in identifying those spaces that are better suited for van use. Enforcement of motor vehicle laws, including parking privileges, is a local matter.

502.7 Relationship to Accessible Routes. 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. Wheel stops are an effective way to prevent vehicle overhangs from reducing the clear width of accessible routes.

503 Passenger Loading Zones [REQUIREMENTS]

503.1 General. Passenger loading zones shall comply with 503.

503.2 Vehicle Pull-Up Space. Passenger loading zones shall provide a vehicular pull-up space 96 inches (2440 mm) wide minimum and 20 feet (6100 mm) long minimum.

503.3 Access Aisle. Passenger loading zones shall provide access aisles complying with 503 adjacent to the vehicle pull-up space. Access aisles shall adjoin an accessible route and shall not overlap the vehicular way.

503.3.1 Width. Access aisles serving vehicle pull-up spaces shall be 60 inches (1525 mm) wide minimum.

503.3.2 Length. Access aisles shall extend the full length of the vehicle pull-up spaces they serve.

503.3.3 Marking. Access aisles shall be marked so as to discourage parking in them.

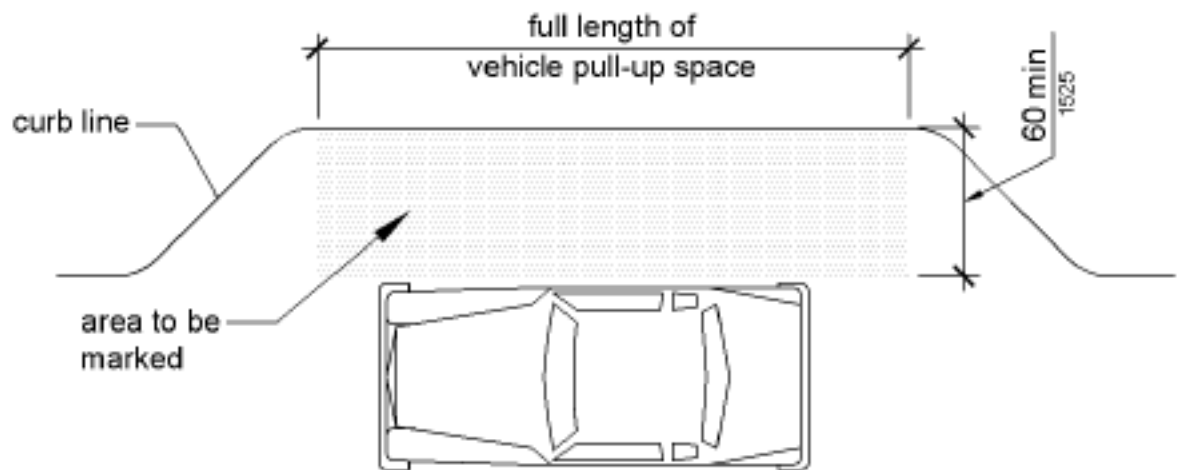


Figure 503.3 Passenger Loading Zone Access Aisle

503.4 Floor and Ground Surfaces. Vehicle pull-up spaces and access aisles serving them shall comply with 302. Access aisles shall be at the same level as the vehicle pull-up space they serve. Changes in level are not permitted.

503.5 Vertical Clearance. Vehicle pull-up spaces, access aisles serving them, and a vehicular route from an entrance to the passenger loading zone, and from the passenger loading zone to a vehicular exit shall provide a vertical clearance of 114 inches (2895 mm) minimum.

Item 2) Changing Rooms

The three poolside and three Bayside changing rooms have no grab bars or changing benches within any of the six spaces. There must be one accessible changing room in each of the two locations at a minimum. Ideally, all six changing rooms would be accessible. The benches are a fundamental ADA-compliant requirement. The grab bars are recommended and encouraged by the U.S. Department of Justice. Grab bars should be installed as a matter of safety in addition to appropriate design with respect to facility function.

This item was noted in the September 10, 2020 letter to APD from FND. The response from APD is highlighted below in yellow. Within the APD response copied below, we have provided comments in red font. We have provided citation for changing benches from the standards. Grab bar design standards can be provided as needed.

APD Statement in October 1, 2020 response letter:

Grab bars and/or changing benches are not required by the Florida Accessibility Code (2017). – changing benches are required under Florida and federal law. See below for citations. It appears the APD is unclear on the intent of the Scoping sections of the standards and the design standards.

Additionally, Section 222 provides standards for dressing, fitting, and locker rooms and makes no mention of grab bars or changing benches. Section 222 is a scoping section, and does not establish design requirements. Refer to Sections 803 and 903, as cited below.

That being said, we do agree that the addition of grab bars has the potential to improve accessibility and enhance guest safety so we will certainly look into adding this feature using existing funds. Please note the following DOJ's advisory:

Advisory 903.4 Back Support. To assist in transferring to the bench, consider providing grab bars on a wall adjacent to the bench, but not on the seat back. If provided, grab bars cannot obstruct transfer to the bench.

Adding benches to the changing rooms would significantly reduce the usable floor space and impede a visitor's ability to maneuver within that space (particularly if they use a wheelchair). As APD noted above, benches are a requirement; also, benches can be foldable so turning space is not an issue.

ADA CHAPTER 2: SCOPING REQUIREMENTS

201 Application

201.1 Scope. All areas of newly designed and newly constructed buildings and facilities and altered portions of existing buildings and facilities shall comply with these requirements.

...

222 Dressing, Fitting, and Locker Rooms [SCOPING]

222.1 General. Where dressing rooms, fitting rooms, or locker rooms are provided, **at least 5 percent, but no fewer than one**, of each type of use **in each cluster** provided shall comply with 803.

803 Dressing, Fitting, and Locker Rooms [REQUIREMENTS]

803.1 General. Dressing, fitting, and locker rooms shall comply with 803.

803.2 Turning Space. Turning space complying with 304 shall be provided within the room.

803.3 Door Swing. Doors shall not swing into the room unless a clear floor or ground space complying with 305.3 is provided beyond the arc of the door swing.

803.4 Benches. A bench complying with 903 shall be provided within the room.

803.5 Coat Hooks and Shelves. Coat hooks provided within the room shall be located within one of the reach ranges specified in 308. Shelves shall be 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor or ground.

903 Benches [REQUIREMENTS]

903.1 General. Benches shall comply with 903.

903.2 Clear Floor or Ground Space. Clear floor or ground space complying with 305 shall be provided and shall be positioned at the end of the bench seat and parallel to the short axis of the bench.

903.3 Size. Benches shall have seats that are 42 inches (1065 mm) long minimum and 20 inches (510 mm) deep minimum and 24 inches (610 mm) deep maximum.

903.4 Back Support. The bench shall provide for back support or shall be affixed to a wall. Back support shall be 42 inches (1065 mm) long minimum and shall extend from a point 2 inches (51 mm) maximum above the seat surface to a point 18 inches (455 mm) minimum above the seat surface. Back support shall be 2 1/2 inches (64 mm) maximum from the rear edge of the seat measured horizontally.

Advisory 903.4 Back Support. To assist in transferring to the bench, **consider providing grab bars on a wall adjacent to the bench, but not on the seat back. If provided, grab bars cannot obstruct transfer to the bench.**

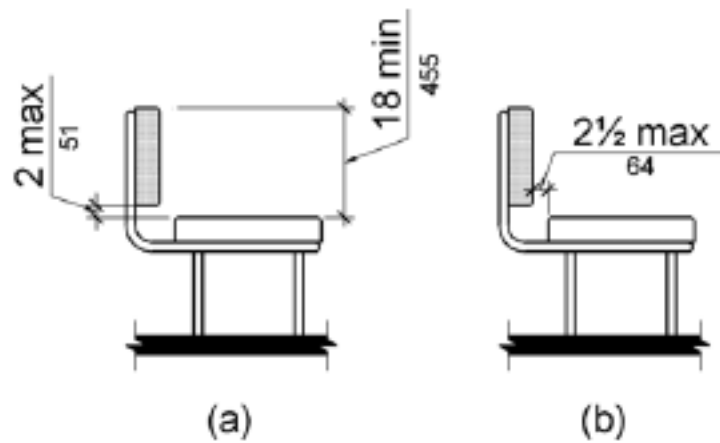


Figure 903.4 Bench Back Support

903.5 Height. The top of the bench seat surface shall be 17 inches (430 mm) minimum and 19 inches (485 mm) maximum above the finish floor or ground.

903.6 Structural Strength. Allowable stresses shall not be exceeded for materials used when a vertical or horizontal force of 250 pounds (1112 N) is applied at any point on the seat, fastener, mounting device, or supporting structure.

903.7 Wet Locations. Where installed in wet locations, the surface of the seat shall be slip resistant and shall not accumulate water.

Item 3) Family Cabin Bathrooms

Toilets in family cabins do not have proper clearance (36" x 36" if t-shaped or 60" if circular) to allow proper access on to toilet. The following sentence was provided in the September 10, 2020 letter from FND. The comment focuses on the renovated family cabin. The requirements for toilet facilities and for toilet compartments both apply to the bathrooms in the family cabins. Without design drawings, however, we cannot confirm compliance but have concerns as to whether the grab bars, mirrors, toilet paper holders, dispensers, and other features were appropriately located per the 2010 Design Standards.

APD Statement in October 1, 2020 response letter:

Renovated family cabin toilets have a 5-foot turning radius/clearance with grab bars. The approach to the bathroom was built at 30" x 48". The statement reaching "the approach to the bathroom" is unclear and does not address the comment. The scoping and design standards that specify the required adequate turning space, which is cited below. The renovated toilets in the family cabins, as installed, do not have the clearance required by the standards.

213 Toilet Facilities and Bathing Facilities [SCOPING]

213.1 General. Where toilet facilities and bathing facilities are provided, they shall comply with 213. ...

213.2 Toilet Rooms and Bathing Rooms. Where toilet rooms are provided, each toilet room shall comply with 603. Where bathing rooms are provided, each bathing room shall comply with 603.

213.3 Plumbing Fixtures and Accessories. Plumbing fixtures and accessories provided in a toilet room or bathing room required to comply with 213.2 shall comply with 213.3.

213.3.1 Toilet Compartments. Where toilet compartments are provided, at least one toilet compartment shall comply with 604.8.1. In addition to the compartment required to comply with 604.8.1, at least one compartment shall comply with 604.8.2 where six or more toilet compartments are provided, or where the combination of urinals and water closets totals six or more fixtures.

Advisory 213.3.1 Toilet Compartments. A toilet compartment is a partitioned space that is located within a toilet room, and that normally contains no more than one water closet. A toilet compartment may also contain a lavatory. A lavatory is a sink provided for hand washing. Full-height partitions and door assemblies can comprise toilet compartments where the minimum required spaces are provided within the compartment.

213.3.2 Water Closets. Where water closets are provided, at least one shall comply with 604.

...

213.3.4 Lavatories. Where lavatories are provided, at least one shall comply with 606 and shall not be located in a toilet compartment.

213.3.5 Mirrors. Where mirrors are provided, at least one shall comply with 603.3.

213.3.6 Bathing Facilities. Where bathtubs or showers are provided, at least one bathtub complying with 607 or at least one shower complying with 608 shall be provided.

213.3.7 Coat Hooks and Shelves. Where coat hooks or shelves are provided in toilet rooms without toilet compartments, at least one of each type shall comply with 603.4. Where coat hooks or shelves are provided in toilet compartments, at least one of each type complying with 604.8.3 shall be provided in toilet compartments required to comply with 213.3.1. Where coat hooks or shelves are provided in bathing facilities, at least one of each type complying with 603.4 shall serve fixtures required to comply with 213.3.6.

603 Toilet and Bathing Rooms [REQUIREMENTS]

603.1 General. Toilet and bathing rooms shall comply with 603.

603.2 Clearances. Clearances shall comply with 603.2.

603.2.1 Turning Space. Turning space complying with 304 shall be provided within the room.

304 Turning Space [REQUIREMENTS]

304.1 General. Turning space shall comply with 304.

304.2 Floor or Ground Surfaces. Floor or ground surfaces of a turning space shall comply with 302. Changes in level are not permitted.

304.3 Size. Turning space shall comply with 304.3.1 or 304.3.2.

304.3.1 Circular Space. The turning space shall be a space of 60 inches (1525 mm) diameter minimum. The space shall be permitted to include knee and toe clearance complying with 306.

304.3.2 T-Shaped Space. The turning space shall be a T-shaped space within a 60 inch (1525 mm) square minimum with arms and base 36 inches (915 mm) wide minimum. Each arm of the T shall be clear of obstructions 12 inches (305 mm) minimum in each direction and the base shall be clear of obstructions 24 inches (610 mm)

minimum. The space shall be permitted to include knee and toe clearance complying with 306 only at the end of either the base or one arm.

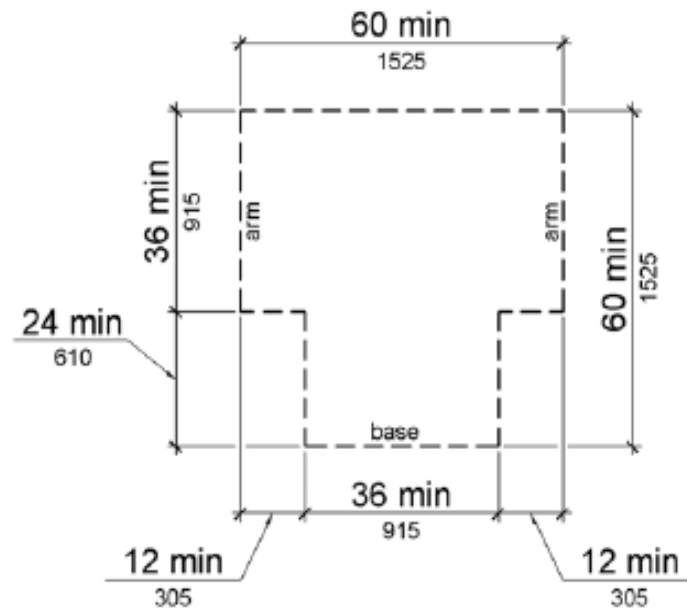


Figure 304.3.2 T-Shaped Turning Space

304.4 Door Swing. Doors shall be permitted to swing into turning spaces.

603.2.2 Overlap. Required clear floor spaces, clearance at fixtures, and turning space shall be permitted to overlap.

603.2.3 Door Swing. Doors shall not swing into the clear floor space or clearance required for any fixture. Doors shall be permitted to swing into the required turning space.

603.3 Mirrors. Mirrors located above lavatories or countertops shall be installed with the bottom edge of the reflecting surface 40 inches (1015 mm) maximum above the finish floor or ground. Mirrors not located above lavatories or countertops shall be installed with the bottom edge of the reflecting surface 35 inches (890 mm) maximum above the finish floor or ground.

Advisory 603.3 Mirrors. 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.

603.4 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

604 Water Closets and Toilet Compartments [REQUIREMENTS]

604.1 General. Water closets and toilet compartments shall comply with 604.2 through 604.8.

604.2 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.

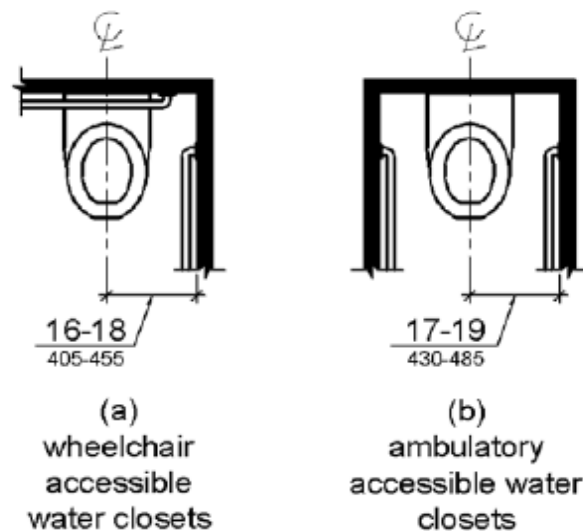


Figure 604.2 Water Closet Location

604.3 Clearance. Clearances around water closets and in toilet compartments shall comply with 604.3.

604.3.1 Size. 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.

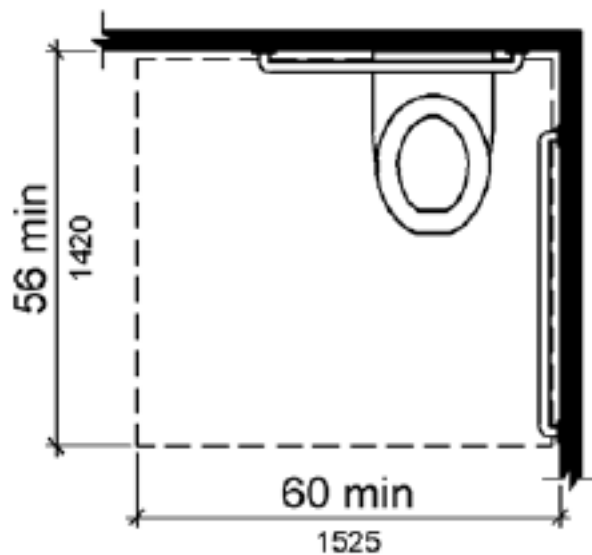


Figure 604.3.1 Size of Clearance at Water Closets

604.3.2 Overlap. The required clearance around the water closet shall be permitted to overlap the water closet, associated grab bars, dispensers, sanitary napkin disposal units, coat hooks, shelves, accessible routes, clear floor space and clearances required at other fixtures, and the turning space. No other fixtures or obstructions shall be located within the required water closet clearance.

Advisory 604.3.2 Overlap. When the door to the toilet room is placed directly in front of the water closet, the water closet cannot overlap the required maneuvering clearance for the door inside the room.

604.4 Seats. 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.

604.5 Grab Bars. Grab bars for water closets shall comply with 609. Grab bars shall be provided on the side wall closest to the water closet and on the rear wall..

604.5.1 Side Wall. 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.

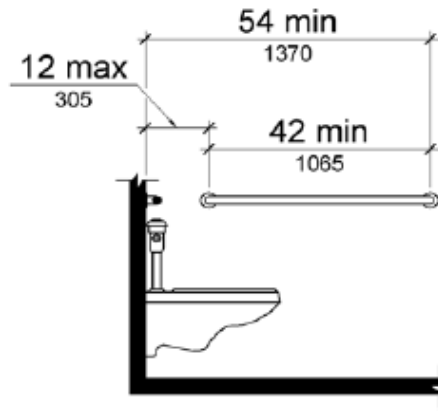


Figure 604.5.1 Side Wall Grab Bar at Water Closets

604.5.2 Rear Wall. The rear wall grab bar shall be 36 inches (915 mm) long minimum and extend from the centerline of the water closet 12 inches (305 mm) minimum on one side and 24 inches (610 mm) minimum on the other side.

EXCEPTIONS:

1. The rear grab bar shall be permitted to be 24 inches (610 mm) long minimum, centered on the water closet, where wall space does not permit a length of 36 inches (915 mm) minimum due to the location of a recessed fixture adjacent to the water closet.
2. Where an administrative authority requires flush controls for flush valves to be located in a position that conflicts with the location of the rear grab bar, then the rear grab bar shall be permitted to be split or shifted to the open side of the toilet area.

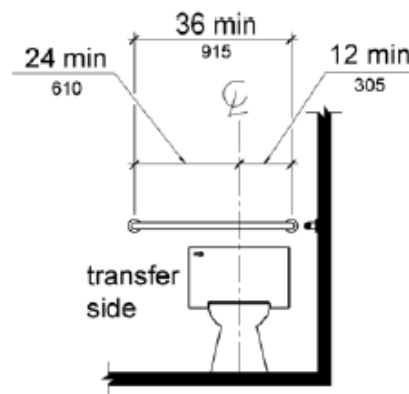


Figure 604.5.2 Rear Wall Grab Bar at Water Closets

604.6 Flush Controls. Flush controls shall be hand operated or automatic. Hand operated flush controls shall comply with 309. Flush controls shall be located on the open side of the water closet except in ambulatory accessible compartments complying with 604.8.2.

Advisory 604.6 Flush Controls. If plumbing valves are located directly behind the toilet seat, flush valves and related plumbing can cause injury or imbalance when a person leans back against them. To prevent causing injury or imbalance, the plumbing can be located behind walls or to the side of the toilet; or if approved by the local authority having jurisdiction, provide a toilet seat lid.

604.7 Dispensers. 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.

Advisory 604.7 Dispensers. If toilet paper dispensers are installed above the side wall grab bar, the outlet of the toilet paper dispenser must be 48 inches (1220 mm) maximum above the finish floor and the top of the gripping surface of the grab bar must be 33 inches (840 mm) minimum and 36 inches (915 mm) maximum above the finish floor.

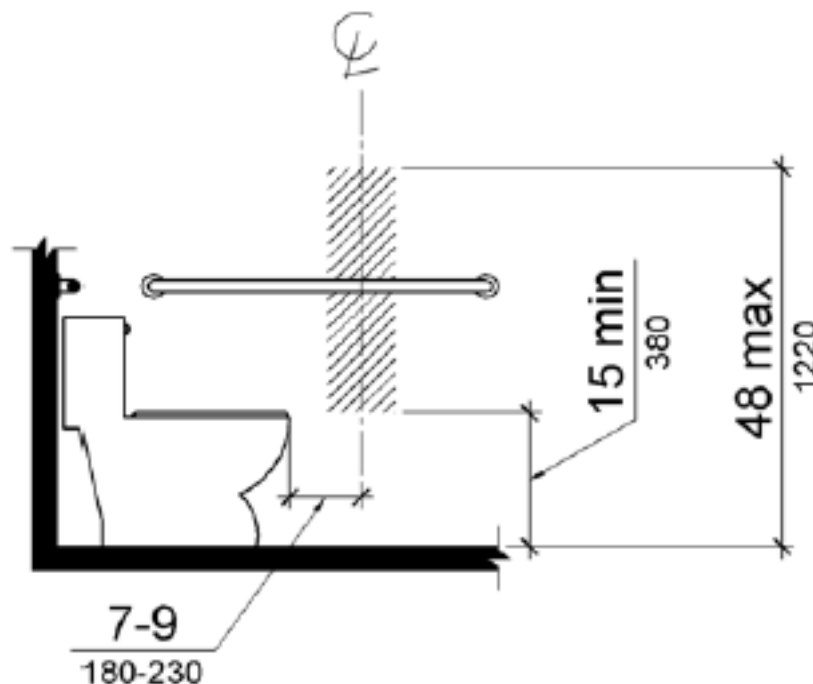


Figure 604.7 Dispenser Outlet Location

604.8 Toilet Compartments. Wheelchair accessible toilet compartments shall meet the requirements of 604.8.1 and 604.8.3. Compartments containing more than one plumbing fixture shall comply with 603. Ambulatory accessible compartments shall comply with 604.8.2 and 604.8.3.

604.8.1 Wheelchair Accessible Compartments. Wheelchair accessible compartments shall comply with 604.8.1.

604.8.1.1 Size. Wheelchair accessible compartments shall be 60 inches (1525 mm) wide minimum measured perpendicular to the side wall, and 56 inches (1420 mm) deep minimum for wall hung water closets and 59 inches (1500 mm) deep minimum for floor mounted water closets measured perpendicular to the rear wall. Wheelchair accessible compartments for children's use shall be 60 inches (1525 mm) wide minimum measured perpendicular to the side wall, and 59 inches (1500 mm) deep minimum for wall hung and floor mounted water closets measured perpendicular to the rear wall.

Advisory 604.8.1.1 Size. The minimum space required in toilet compartments is provided so that a person using a wheelchair can maneuver into position at the water closet. This space cannot be obstructed by baby changing tables or other fixtures or conveniences, except as specified at 604.3.2 (Overlap). If toilet compartments are to be used to house fixtures other than those associated with the water closet, they must be designed to exceed the minimum space requirements. Convenience fixtures such as baby changing tables must also be accessible to people with disabilities as well as to other users. Toilet compartments that are designed to meet, and not exceed, the minimum space requirements may not provide adequate space for maneuvering into position at a baby changing table.

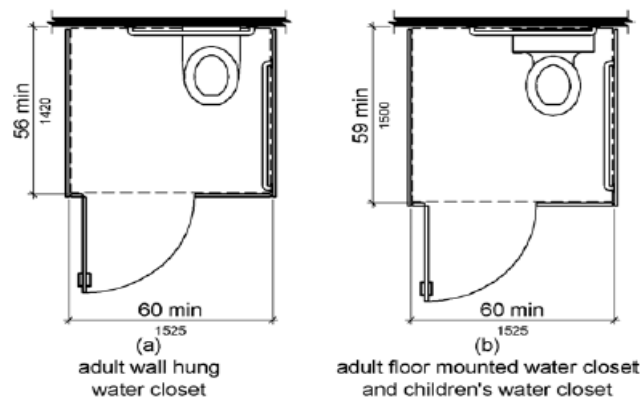


Figure 604.8.1.1 Size of Wheelchair Accessible Toilet Compartment

604.8.1.2 Doors. Toilet compartment doors, including door hardware, shall comply with 404 except that if the approach is to the latch side of the compartment door, clearance between the door side of the compartment and any obstruction shall be 42 inches (1065 mm) minimum. Doors shall be located in the front partition or in the side wall or partition farthest from the water closet. Where located in **the** front partition, the door opening shall be 4 inches (100 mm) maximum from the side wall or partition farthest from the water closet. Where located in the side wall or partition, the door opening shall be 4 inches (100 mm) maximum from the front partition. The door shall be self-closing. A door pull complying with 404.2.7 shall be placed on both sides of the door near the latch. Toilet compartment doors shall not swing into the minimum required compartment area.

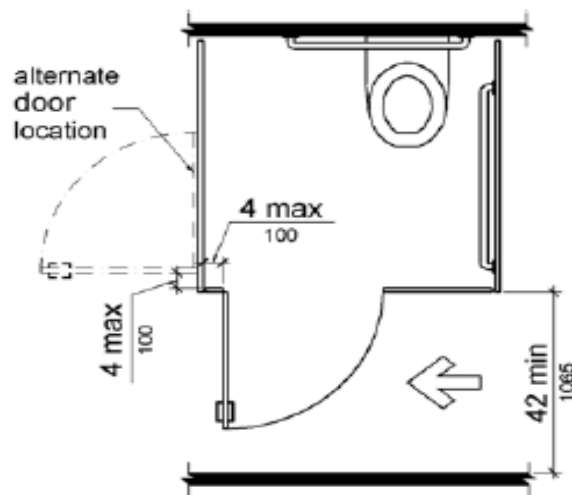


Figure 604.8.1.2 Wheelchair Accessible Toilet Compartment Doors

604.8.1.3 Approach. Compartments shall be arranged for left-hand or right-hand approach to the water closet.

604.8.1.4 Toe Clearance. The front partition and at least one side partition shall provide a toe clearance of 9 inches (230 mm) minimum above the finish floor and 6 inches (150 mm) deep minimum beyond the compartment-side face of the partition, exclusive of partition support members. Compartments for children's use shall provide a toe clearance of 12 inches (305 mm) minimum above the finish floor.

EXCEPTION: Toe clearance at the front partition is not required in a compartment greater than 62 inches (1575 mm) deep with a wall-hung water closet or 65 inches (1650 mm) deep with a floor-mounted water closet. Toe clearance at the side partition is not required in a compartment greater than 66 inches (1675 mm) wide. Toe clearance at the front partition is not required in a compartment for children's use that is greater

than 65 inches (1650 mm) deep.

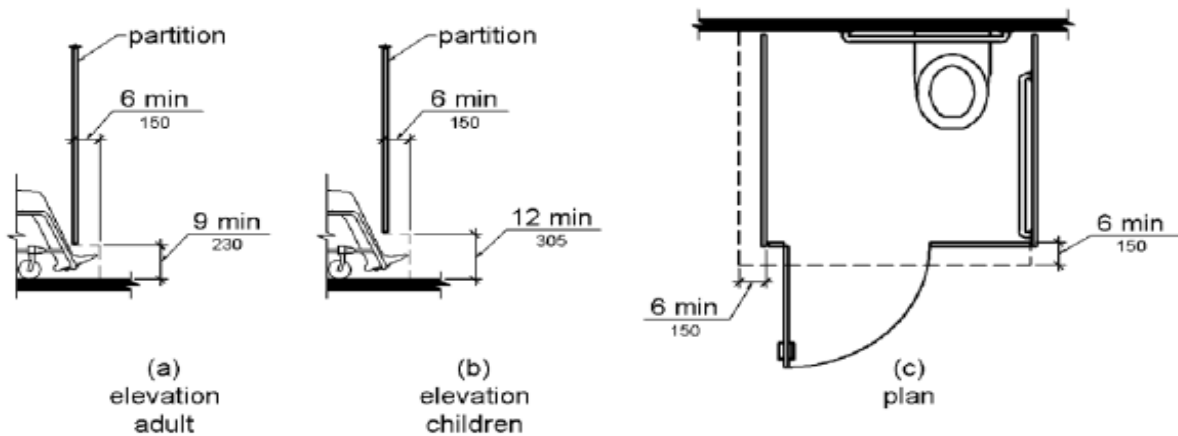


Figure 604.8.1.4 Wheelchair Accessible Toilet Compartment Toe Clearance

604.8.1.5 Grab Bars. Grab bars shall comply with 609. A side-wall grab bar complying with 604.5.1 shall be provided and shall be located on the wall closest to the water closet. In addition, a rear-wall grab bar complying with 604.5.2 shall be provided.

...

604.8.2.2 Doors. Toilet compartment doors, including door hardware, shall comply with 404, except that if the approach is to the latch side of the compartment door, clearance between the door side of the compartment and any obstruction shall be 42 inches (1065 mm) minimum. The door shall be self-closing. A door pull complying with 404.2.7 shall be placed on both sides of the door near the latch. Toilet compartment doors shall not swing into the minimum required compartment area.

604.8.2.3 Grab Bars. Grab bars shall comply with 609. A side-wall grab bar complying with 604.5.1 shall be provided on both sides of the compartment.

604.8.3 Coat Hooks and Shelves. Coat hooks shall be located within one of the reach ranges specified in 308. Shelves shall be located 40 inches (1015 mm) minimum and 48 inches (1220 mm) maximum above the finish floor.

Item 4) Family Cabin Kitchen

Kitchens must provide for access, and the kitchen sinks must be accessible. A portion of the counterspace must provide for forward access relative to the oven and/or sink position. Forward access surfaces should be provided next to oven and sink given the amount of available counter space. Even if some storage space must be removed, sufficient accessible storage space should still be available to meet the minimum storage requirements. Given the excessive amount of cookware storage space, the design should be changed to increase access at the expense of the excessive cookware storage. Also, the pathway through the kitchen (assuming it is considered a pass-through kitchen) must be at least 40 inches wide, and we believe the current width is less than 32 inches in certain spaces. The refrigerator and the freezer installed should be designed to meet the minimal accessible design standards. Below are the scoping and design standards. Again and as noted above, while the standards provide for minimal accessibility requirements, the Park should go well beyond the minimum considering the function and purpose of the Park. Based on a recent site visit, the above items are not in compliance with the minimum requirements of the standards.

212 Kitchens, Kitchenettes, and Sinks [SCOPING]

212.1 General. Where provided, kitchens, kitchenettes, and sinks shall comply with 212.

212.2 Kitchens and Kitchenettes. Kitchens and kitchenettes shall comply with 804.

212.3 Sinks. Where sinks are provided, at least 5 percent, but no fewer than one, of each type provided in each accessible room or space shall comply with 606.

804 Kitchens and Kitchenettes [REQUIREMENTS]

804.1 General. Kitchens and kitchenettes shall comply with 804.

804.2 Clearance. Where a pass through kitchen is provided, clearances shall comply with 804.2.1. Where a U-shaped kitchen is provided, clearances shall comply with 804.2.2.

EXCEPTION: Spaces that do not provide a cooktop or conventional range shall not be required to comply with 804.2.

Advisory 804.2 Clearance. Clearances are measured from the furthest projecting face of all opposing base cabinets, counter tops, appliances, or walls, excluding hardware.

804.2.1 Pass Through Kitchen. In pass through kitchens where counters, appliances or cabinets are on two opposing sides, or where counters, appliances or cabinets are opposite a parallel wall, clearance between all opposing base cabinets, counter tops, appliances, or walls within kitchen work areas shall be 40 inches (1015 mm) minimum. Pass through kitchens shall have two entries.

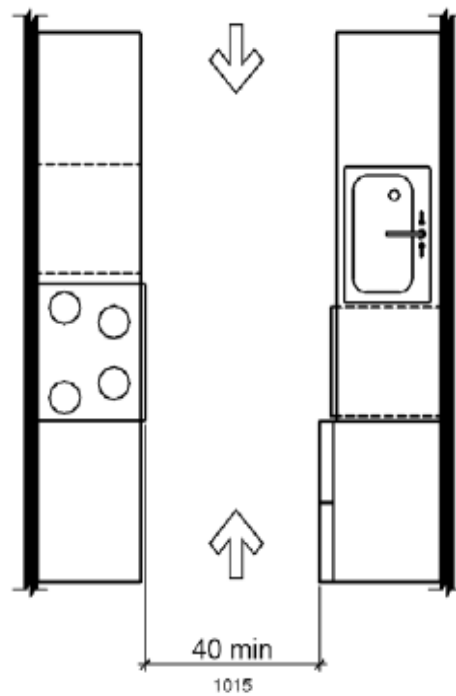


Figure 804.2.1 Pass Through Kitchens

804.2.2 U-Shaped. 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.

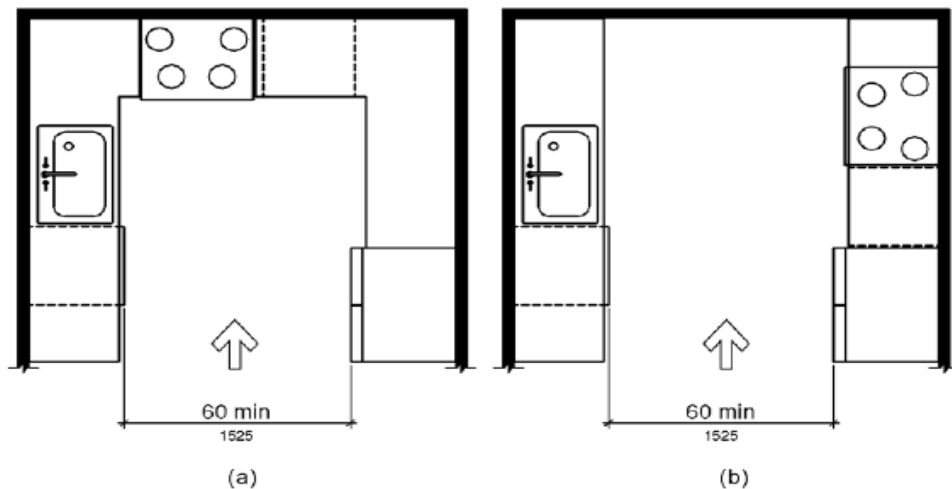


Figure 804.2.2 U-Shaped Kitchens

804.3 Kitchen Work Surface. In residential dwelling units required to comply with 809, at least one 30 inches (760 mm) wide minimum section of counter shall provide a kitchen work surface that complies with 804.3.

804.3.1 Clear Floor or Ground Space. A clear floor space complying with 305 positioned for a forward approach shall be provided. The clear floor or ground space shall be centered on the kitchen work surface and shall provide knee and toe clearance complying with 306.

804.3.2 Height. The kitchen work surface shall be 34 inches (865 mm) maximum above the finish floor or ground.

EXCEPTION: A counter that is adjustable to provide a kitchen work surface at variable heights, 29 inches (735 mm) minimum and 36 inches (915 mm) maximum, shall be permitted.

804.3.3 Exposed Surfaces. There shall be no sharp or abrasive surfaces under the work surface counters.

804.4 Sinks. Sinks shall comply with 606.

804.5 Storage. At least 50 percent of shelf space in storage facilities shall comply with 811.

804.6 Appliances. Where provided, kitchen appliances shall comply with 804.6.

804.6.1 Clear Floor or Ground Space. A clear floor or ground space complying with 305 shall be provided at each kitchen appliance. Clear floor or ground spaces shall be permitted to overlap.

804.6.2 Operable Parts. All appliance controls shall comply with 309.

804.6.3 Dishwasher. Clear floor or ground space shall be positioned adjacent to the dishwasher door. The dishwasher door, in the open position, shall not obstruct the clear floor or ground space for the dishwasher or the sink.

804.6.4 Range or Cooktop. Where a forward approach is provided, the clear floor or ground space shall provide knee and toe clearance complying with 306. Where knee and toe space is provided, the underside of the range or cooktop shall be insulated or otherwise configured to prevent burns, abrasions, or electrical shock. The location of controls shall not require reaching across burners.

804.6.5 Oven. Ovens shall comply with 804.6.5.

804.6.5.1 Side-Hinged Door Ovens. Side-hinged door ovens shall have the work surface required by [804.3](#) positioned adjacent to the latch side of the oven door.

804.6.5.2 Bottom-Hinged Door Ovens. Bottom-hinged door ovens shall have the work surface required by [804.3](#) positioned adjacent to one side of the door.

804.6.5.3 Controls. Ovens shall have controls on front panels.

804.6.6 Refrigerator/Freezer. Combination refrigerators and freezers shall have at least 50 percent of the freezer space 54 inches (1370 mm) maximum above the finish floor or ground. The clear floor or ground space shall be positioned for a parallel approach to the space dedicated to a refrigerator/freezer with the centerline of the clear floor or ground space offset 24 inches (610 mm) maximum from the centerline of the dedicated space.

606 Lavatories and Sinks [REQUIREMENTS]

606.1 General. Lavatories and sinks shall comply with 606.

Advisory 606.1 General. If soap and towel dispensers are provided, they must be located within the reach ranges specified in 308. Locate soap and towel dispensers so that they are conveniently usable by a person at the accessible lavatory.

606.2 Clear Floor Space. A clear floor space complying with 305, positioned for a forward approach, and knee and toe clearance complying with 306 shall be provided.

606.3 Height. 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.

606.4 Faucets. Controls for faucets shall comply with 309. Hand-operated metering faucets shall remain open for 10 seconds minimum.

606.5 Exposed Pipes and Surfaces. Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact. There shall be no sharp or abrasive surfaces under lavatories and sinks.

811 Storage [REQUIREMENTS]

811.1 General. Storage shall comply with 811.

811.2 Clear Floor or Ground Space. A clear floor or ground space complying with 305 shall be provided.

811.3 Height. Storage elements shall comply with at least one of the reach ranges specified in 308.

811.4 Operable Parts. Operable parts shall comply with 309.

309 Operable Parts [REQUIREMENTS]

309.1 General. Operable parts shall comply with 309.

309.2 Clear Floor Space. A clear floor or ground space complying with 305 shall be provided.

309.3 Height. Operable parts shall be placed within one or more of the reach ranges specified in 308.

309.4 Operation. Operable parts shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. The force required to activate operable parts shall be 5 pounds (22.2 N) maximum.

305 Clear Floor or Ground Space [REQUIREMENTS]

305.1 General. Clear floor or ground space shall comply with 305.

305.2 Floor or Ground Surfaces. Floor or ground surfaces of a clear floor or ground space shall comply with 302. Changes in level are not permitted.

305.3 Size. The clear floor or ground space shall be 30 inches (760 mm) minimum by 48 inches (1220 mm) minimum.

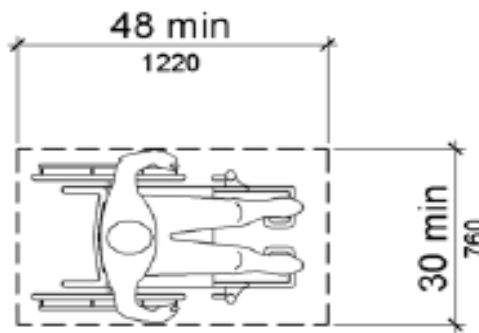


Figure 305.3 Clear Floor or Ground Space

305.4 Knee and Toe Clearance. Unless otherwise specified, clear floor or ground space shall be permitted to include knee and toe clearance complying with 306.

305.5 Position. Unless otherwise specified, clear floor or ground space shall be positioned for either forward or parallel approach to an element.

306 Knee and Toe Clearance [REQUIREMENTS]

306.1 General. Where space beneath an element is included as part of clear floor or ground space or turning space, the space shall comply with 306. Additional space shall not be prohibited beneath an element but shall not be considered as part of the clear floor or ground space or turning space.

Advisory 306.1 General. Clearances are measured in relation to the usable clear floor space, not necessarily to the vertical support for an element. When determining clearance under an object for required turning or maneuvering space, care should be taken to ensure the space is clear of any obstructions.

306.2 Toe Clearance.

306.2.1 General. Space under an element between the finish floor or ground and 9 inches (230 mm) above the finish floor or ground shall be considered toe clearance and shall comply with 306.2.

306.2.2 Maximum Depth. Toe clearance shall extend 25 inches (635 mm) maximum under an element.

306.2.3 Minimum Required Depth. Where toe clearance is required at an element as part of a clear floor space, the toe clearance shall extend 17 inches (430 mm) minimum under the element.

306.2.4 Additional Clearance. Space extending greater than 6 inches (150 mm) beyond the available knee clearance at 9 inches (230 mm) above the finish floor or ground shall not be considered toe clearance.

306.2.5 Width. Toe clearance shall be 30 inches (760 mm) wide minimum.

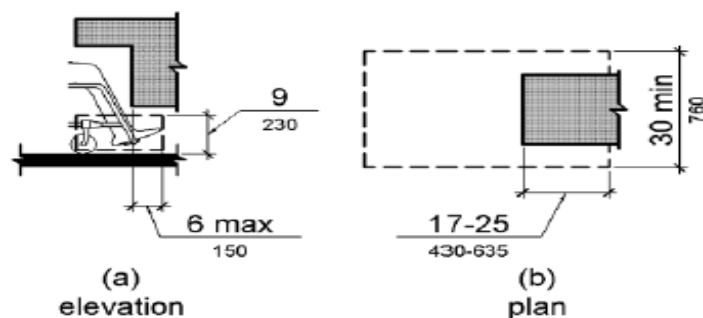


Figure 306.2 Toe Clearance

306.3 Knee Clearance.

306.3.1 General. Space under an element between 9 inches (230 mm) and 27 inches (685 mm) above the finish floor or ground shall be considered knee clearance and shall comply with 306.3.

306.3.2 Maximum Depth. Knee clearance shall extend 25 inches (635 mm) maximum under an element at 9 inches (230 mm) above the finish floor or ground.

306.3.3 Minimum Required Depth. Where knee clearance is required under an element as part of a clear floor space, the knee clearance shall be 11 inches (280 mm) deep minimum at 9 inches (230 mm) above the finish floor or ground, and 8 inches (205 mm) deep minimum at 27 inches (685 mm) above the finish floor or ground.

306.3.4 Clearance Reduction. Between 9 inches (230 mm) and 27 inches (685 mm) above the finish floor or ground, the knee clearance shall be permitted to reduce at a rate of 1 inch (25 mm) in depth for each 6 inches (150 mm) in height.

306.3.5 Width. Knee clearance shall be 30 inches (760 mm) wide minimum.

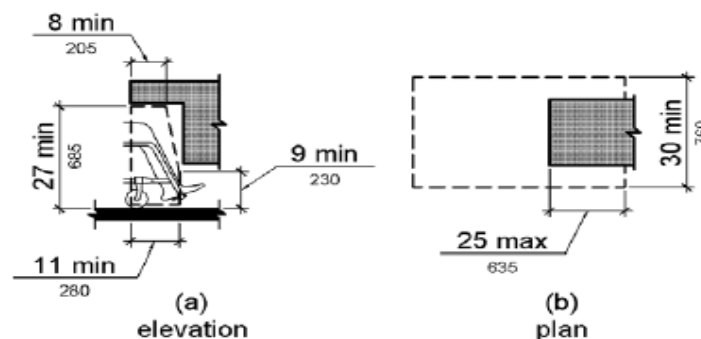


Figure 306.3 Knee Clearance

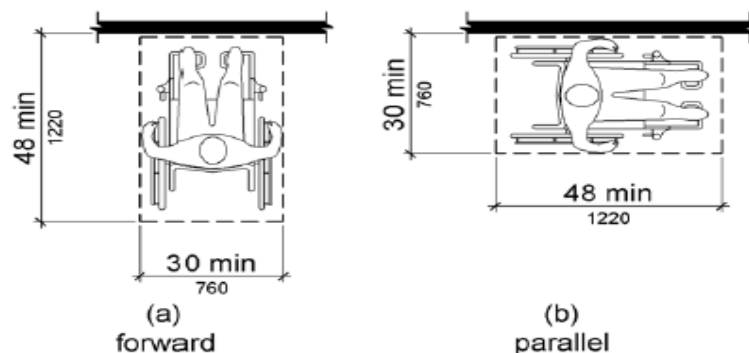


Figure 305.5 Position of Clear Floor or Ground Space

305.6 Approach. One full unobstructed side of the clear floor or ground space shall adjoin an accessible route or adjoin another clear floor or ground space.

305.7 Maneuvering Clearance. Where a clear floor or ground space is located in an alcove or otherwise confined on all or part of three sides, additional maneuvering clearance shall be provided in accordance with 305.7.1 and 305.7.2.

305.7.1 Forward Approach. Alcoves shall be 36 inches (915 mm) wide minimum where the depth exceeds 24 inches (610 mm).

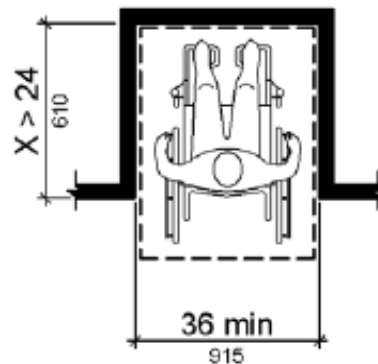


Figure 305.7.1 Maneuvering Clearance in an Alcove, Forward Approach

305.7.2 Parallel Approach. Alcoves shall be 60 inches (1525 mm) wide minimum where the depth exceeds 15 inches (380 mm).

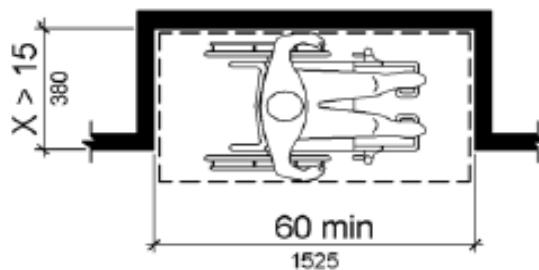


Figure 305.7.2 Maneuvering Clearance in an Alcove, Parallel Approach

5) Family Cabin Bedrooms

The square footage in bedrooms has been reduced. The bedrooms will not allow access to both sides of the bed, which causes issues for transferring in and out of mobility devices. Customers/guests/visitors may be relegated to one bedroom or the other based on their mobility preferences. Someone missing their right arm or leg may be limited to only the left side of the bed. Furniture placement will be critical to ensure accessibility throughout the room. APD must comply with the 2010 Design Standards and must provide sufficient space on both sides of the bed. Please provide the bedroom dimensions and confirm how beds will be placed to ensure compliance with accessibility requirements.

APD Response:

Adopting these recommendations would reduce usable floor space and subsequently result in a decreased guest capacity within each cabin (pursuant to the Life Safety Code as monitored and enforced by local fire officials). If you have recommendations for furniture placement, please let us know.

224 Transient Lodging Guest Rooms [SCOPING – ARGUABLY INTENT IS TO HAVE 100% OF THE “ROOMS” BE ACCESSIBLE]

224.1 General. Transient lodging facilities shall provide guest rooms in accordance with [224](#). [See additional requirements for places of lodging at [28 CFR 36.406\(c\)](#) and for housing at a place of education at [28 CFR 35.151\(f\)](#) and [28 CFR 36.406\(e\)](#).]

Advisory 224.1 General. Certain facilities used for transient lodging, including time shares, dormitories, and town homes may be covered by both these requirements and the Fair Housing Amendments Act. The Fair Housing Amendments Act requires that certain residential structures having four or more multi-family dwelling units, regardless of whether they are privately owned or federally assisted, include certain features of accessible and adaptable design according to guidelines established by the U.S. Department of Housing and Urban Development (HUD). This law and the appropriate regulations should be consulted before proceeding with the design and construction of residential housing.

224.1.1 Alterations. Where guest rooms are altered or added, the requirements of [224](#) shall apply only to the guest rooms being altered or added until the number of guest rooms complies with the minimum number required for new construction.

Advisory 224.1.1 Alterations. In alterations and additions, the minimum required number of accessible guest rooms is based on the total number of guest rooms altered or added instead of the total number of guest rooms provided in a facility. Typically, each alteration of a facility is limited to a particular portion of the facility. When accessible guest rooms are added as a result of subsequent

alterations, compliance with 224.5 (Dispersion) is more likely to be achieved if all of the accessible guest rooms are not provided in the same area of the facility.

224.1.2 Guest Room Doors and Doorways. Entrances, doors, and doorways providing user passage into and within guest rooms that are not required to provide mobility features complying with 806.2 shall comply with 404.2.3.

Advisory 224.1.2 Guest Room Doors and Doorways. Because of the social interaction that often occurs in lodging facilities, an accessible clear opening width is required for doors and doorways to and within all guest rooms, including those not required to be accessible. This applies to all doors, including bathroom doors, that allow full user passage. Other requirements for doors and doorways in Section 404 do not apply to guest rooms not required to provide mobility features.

224.2 Guest Rooms with Mobility Features. In transient lodging facilities, guest rooms with mobility features complying with 806.2 shall be provided in accordance with Table 224.2.

Table 224.2 Guest Rooms with Mobility Features [\(text version\)](#)

Total Number of Guest Rooms Provided	Minimum Number of Required Rooms Without Roll-in Showers	Minimum Number of Required Rooms With Roll-in Showers	Total Number of Required Rooms
1 to 25	1	0	1

224.3 Beds. In guest rooms having more than 25 beds, 5 percent minimum of the beds shall have clear floor space complying with [806.2.3](#).

224.4 Guest Rooms with Communication Features. In transient lodging facilities, guest rooms with communication features complying with 806.3 shall be provided in accordance with Table 224.4.

Table 224.4 Guest Rooms with Communication Features

Total Number of Guest Rooms Provided	Minimum Number of Required Guest Rooms With Communication Features
2 to 25	2
26 to 50	4

224.5 Dispersion. Guest rooms required to provide mobility features complying with 806.2 and guest rooms required to provide communication features complying with 806.3 shall be dispersed among the various classes of guest rooms, and shall provide choices of types of guest rooms, number of beds, and other amenities comparable to the choices provided to other guests. Where the minimum number of guest rooms required to comply with 806 is not sufficient to allow for complete dispersion, guest rooms shall be dispersed in the following priority: guest room type, number of beds, and amenities. At least one guest room required to provide mobility features complying with 806.2 shall also provide communication features complying with 806.3. Not more than 10 percent of guest rooms required to provide mobility features complying with 806.2 shall be used to satisfy the minimum number of guest rooms required to provide communication features complying with 806.3.

Advisory 224.5 Dispersion. Factors to be considered in providing an equivalent range of options may include, but are not limited to, room size, bed size, cost, view, bathroom fixtures such as hot tubs and spas, smoking and nonsmoking, and the number of rooms provided.

806 Transient Lodging Guest Rooms [REQUIREMENTS]

806.1 General. Transient lodging guest rooms shall comply with [806](#). Guest rooms required to provide mobility features shall comply with 806.2. Guest rooms required to provide communication features shall comply with 806.3.

806.2 Guest Rooms with Mobility Features. Guest rooms required to provide mobility features shall comply with 806.2.

Advisory 806.2 Guest Rooms. The requirements in Section 806.2 do not include requirements that are common to all accessible spaces. For example, closets in guest rooms must comply with the applicable provisions for storage specified in scoping.

806.2.1 Living and Dining Areas. Living and dining areas shall be accessible.

806.2.2 Exterior Spaces. Exterior spaces, including patios, terraces and balconies, that serve the guest room shall be accessible.

806.2.3 Sleeping Areas. At least one sleeping area shall provide a clear floor space complying with 305 on both sides of a bed. The clear floor space shall be positioned for parallel approach to the side of the bed.

EXCEPTION: Where a single clear floor space complying with 305 positioned for parallel approach is provided between two beds, a clear floor or ground space shall not be required on both sides of a bed.

305 Clear Floor or Ground Space

305.1 General. Clear floor or ground space shall comply with 305.

305.2 Floor or Ground Surfaces. Floor or ground surfaces of a clear floor or ground space shall comply with 302. Changes in level are not permitted.

EXCEPTION: Slopes not steeper than 1:48 shall be permitted.

305.3 Size. The clear floor or ground space shall be 30 inches (760 mm) minimum by 48 inches (1220 mm) minimum.

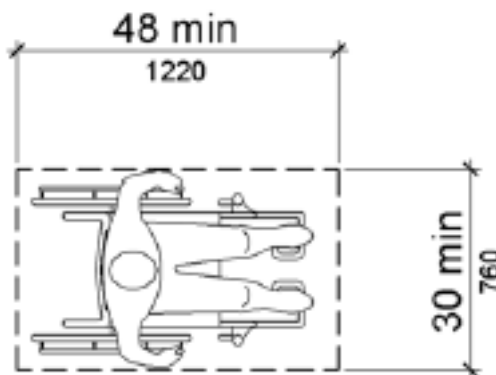


Figure 305.3 Clear Floor or Ground Space

305.4 Knee and Toe Clearance. Unless otherwise specified, clear floor or ground space shall be permitted to include knee and toe clearance complying with 306.

305.5 Position. Unless otherwise specified, clear floor or ground space shall be positioned for either forward or parallel approach to an element.

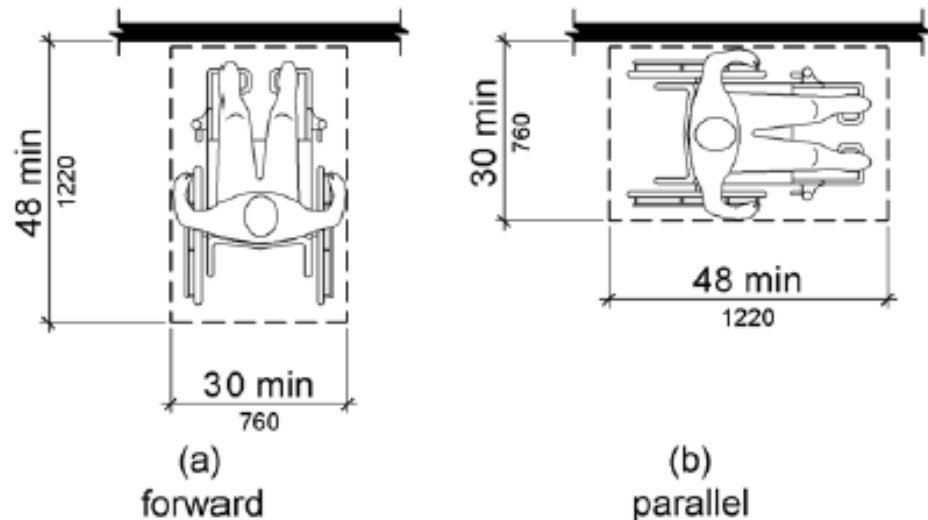


Figure 305.5 Position of Clear Floor or Ground Space

305.6 Approach. One full unobstructed side of the clear floor or ground space shall adjoin an accessible route or adjoin another clear floor or ground space.

305.7 Maneuvering Clearance. Where a clear floor or ground space is located in an alcove or otherwise confined on all or part of three sides, additional maneuvering clearance shall be provided in accordance with 305.7.1 and 305.7.2.

806.2.4 Toilet and Bathing Facilities. At least one bathroom that is provided as part of a guest room shall comply with 603. No fewer than one water closet, one lavatory, and one bathtub or shower shall comply with applicable requirements of 603 through 610. In addition, required roll-in shower compartments shall comply with 608.2.2 or 608.2.3. Toilet and bathing fixtures required to comply with 603 through 610 shall be permitted to be located in more than one toilet or bathing area, provided that travel between fixtures does not require travel between other parts of the guest room.

806.2.4.1 Vanity Counter Top Space. If vanity counter top space is provided in non-accessible guest toilet or bathing rooms, comparable vanity counter top space, in terms

of size and proximity to the lavatory, shall also be provided in accessible guest toilet or bathing rooms.

Advisory 806.2.4.1 Vanity Counter Top Space. This provision is intended to ensure that accessible guest rooms are provided with comparable vanity counter top space.

806.2.5 Kitchens and Kitchenettes. Kitchens and kitchenettes shall comply with 804.

806.2.6 Turning Space. Turning space complying with 304 shall be provided within the guest room.

806.3 Guest Rooms with Communication Features. Guest rooms required to provide communication features shall comply with 806.3.

Advisory 806.3 Guest Rooms with Communication Features. In guest rooms required to have accessible communication features, consider ensuring compatibility with adaptive equipment used by people with hearing impairments. To ensure communication within the facility, as well as on commercial lines, provide telephone interface jacks that are compatible with both digital and analog signal use. If an audio headphone jack is provided on a speaker phone, a cutoff switch can be included in the jack so that insertion of the jack cuts off the speaker. If a telephone-like handset is used, the external speakers can be turned off when the handset is removed from the cradle. For headset or external amplification system compatibility, a standard subminiature jack installed in the telephone will provide the most flexibility.

806.3.1 Alarms. Where emergency warning systems are provided, alarms complying with 702 shall be provided.

806.3.2 Notification Devices. Visible notification devices shall be provided to alert room occupants of incoming telephone calls and a door knock or bell. Notification devices shall not be connected to visible alarm signal appliances. Telephones shall have volume controls compatible with the telephone system and shall comply with 704.3. Telephones shall be served by an electrical outlet complying with 309 located within 48 inches (1220 mm) of the telephone to facilitate the use of a TTY.

6) Family Cabins – Open Areas/Living Spaces Hooks/Levers, Electrical Outlets, Blinds, etc.

Item 6A - The bedrooms do not have closets, so shelving and/or dresser drawers will be essential and will need to be accessible with hooks and levers, not knobs. Knobs must be replaced with hooks and levers under the 2010 Design Standards. Knobs require tight pinching and grasping and are not allowed under the 2010 Design Standards. Also, at least 50% of all storage space provided must be accessible, which is addressed in more detail above.

Item 6B - Additional electric outlets in the bedrooms may be needed to accommodate for multiple pieces of adaptive equipment (recharging power chairs, baby monitors, CPAP machines, ventilator, lift devices, or other electrical tools). In addition, the outlets must be accessible and placed at an appropriate height. Some of the outlets appear to be too low to be accessible.

Item 6C - We recommend electronic controls for the window blinds because access to the blinds must be provided. Furniture positioning will most likely be against the walls, thus blocking access to manual controls for blinds/curtains. The blinds must be accessible in any event.

APD response:

This is a great suggestion and we will definitely explore the feasibility of replacing knobs with hooks or levers with (using existing funds).

This is another good idea and we will definitely look into adding more electrical outlets using existing funds.

This is another great suggestion and we will explore the feasibility of making this modification within existing funds.

205 Operable Parts [SCOPING]

205.1 General. Operable parts on accessible elements, accessible routes, and in accessible rooms and spaces shall comply with 309.

Advisory 205.1 General. Controls covered by 205.1 include, but are not limited to, light switches, circuit breakers, duplexes and other convenience receptacles, environmental and appliance controls, plumbing fixture controls, and security and intercom systems.

EXCEPTIONS:

1. Operable parts that are intended for use only by service or maintenance personnel shall not be required to comply with 309.
2. Electrical or communication receptacles serving a dedicated use shall not be required to comply with 309.

3. Where two or more outlets are provided in a kitchen above a length of counter top that is uninterrupted by a sink or appliance, one outlet shall not be required to comply with 309.
4. Floor electrical receptacles shall not be required to comply with 309.
5. HVAC diffusers shall not be required to comply with 309.
6. Except for light switches, where redundant controls are provided for a single element, one control in each space shall not be required to comply with 309.
7. Cleats and other boat securement devices shall not be required to comply with 309.3.
8. Exercise machines and exercise equipment shall not be required to comply with 309.

309 Operable Parts [REQUIREMENTS]

309.1 General. Operable parts shall comply with 309.

309.2 Clear Floor Space. A clear floor or ground space complying with 305 shall be provided.

309.3 Height. Operable parts shall be placed within one or more of the reach ranges specified in 308.

309.4 Operation. Operable parts shall be operable with one hand and shall not require tight grasping, pinching, or twisting of the wrist. The force required to activate operable parts shall be 5 pounds (22.2 N) maximum.

305 Clear Floor or Ground Space [REQUIREMENTS]

305.1 General. Clear floor or ground space shall comply with 305.

305.2 Floor or Ground Surfaces. Floor or ground surfaces of a clear floor or ground space shall comply with 302 [stable, level, slip-resistant]. Changes in level are not permitted.

305.3 Size. The clear floor or ground space shall be 30 inches (760 mm) minimum by 48 inches (1220 mm) minimum.

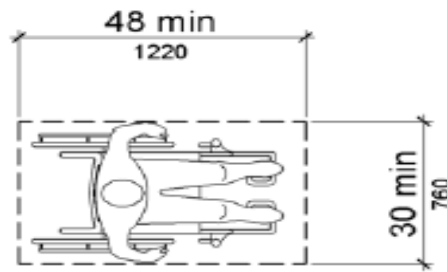


Figure 305.3 Clear Floor or Ground Space

305.4 Knee and Toe Clearance. Unless otherwise specified, clear floor or ground space shall be permitted to include knee and toe clearance complying with 306.

305.5 Position. Unless otherwise specified, clear floor or ground space shall be positioned for either forward or parallel approach to an element.

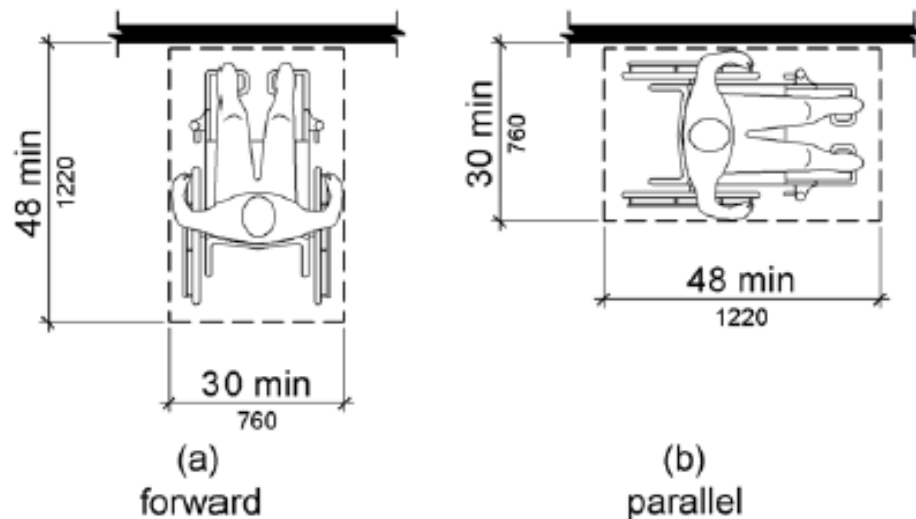


Figure 305.5 Position of Clear Floor or Ground Space

305.6 Approach. One full unobstructed side of the clear floor or ground space shall adjoin an accessible route or adjoin another clear floor or ground space.

305.7 Maneuvering Clearance. Where a clear floor or ground space is located in an alcove or otherwise confined on all or part of three sides, additional maneuvering clearance shall be provided in accordance with 305.7.1 and 305.7.2.

305.7.1 Forward Approach. Alcoves shall be 36 inches (915 mm) wide minimum where the depth exceeds 24 inches (610 mm).

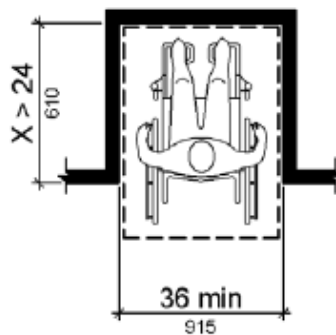


Figure 305.7.1 Maneuvering Clearance in an Alcove, Forward Approach

305.7.2 Parallel Approach. Alcoves shall be 60 inches (1525 mm) wide minimum where the depth exceeds 15 inches (380 mm).

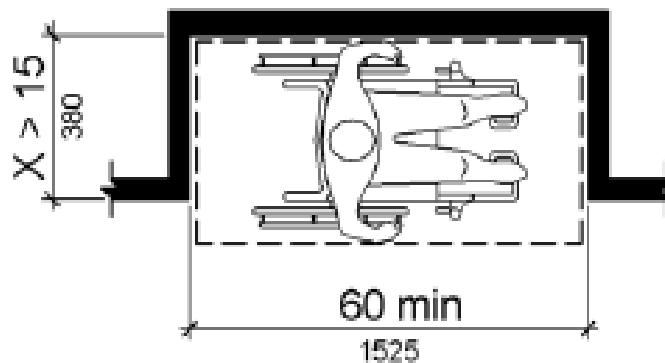


Figure 305.7.2 Maneuvering Clearance in an Alcove, Parallel Approach

308 Reach Ranges [REQUIREMENTS]

308.1 General. Reach ranges shall comply with 308.

308.2 Forward Reach.

308.2.1 Unobstructed. Where a forward reach is unobstructed, the high forward reach shall be 48 inches (1220 mm) maximum and the low forward reach shall be 15 inches (380 mm) minimum above the finish floor or ground.

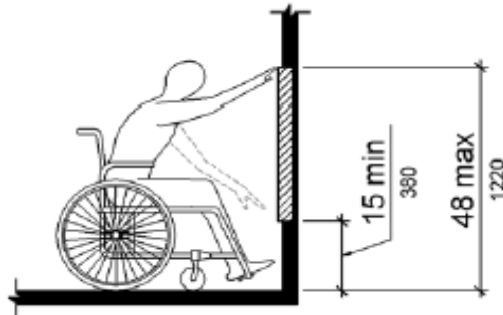


Figure 308.2.1 Unobstructed Forward Reach

308.2.2 Obstructed High Reach. 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.

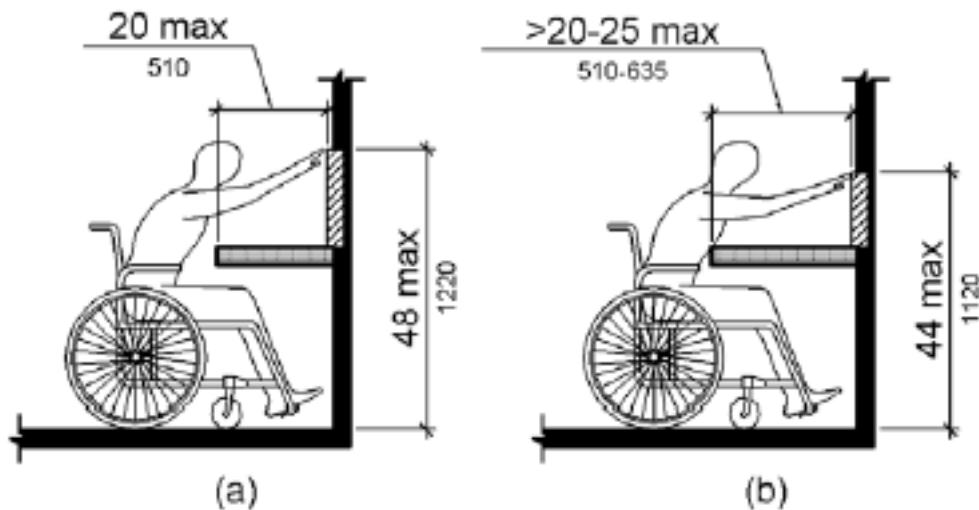


Figure 308.2.2 Obstructed High Forward Reach

308.3 Side Reach.

308.3.1 Unobstructed. 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.

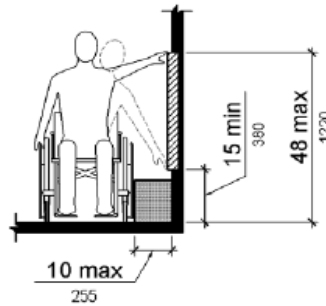


Figure 308.3.1 Unobstructed Side Reach

308.3.2 Obstructed High Reach. Where a clear floor or ground space allows a parallel approach to an element and the high side reach is over an obstruction, the height of the obstruction shall be 34 inches (865 mm) maximum and the depth of the obstruction shall be 24 inches (610 mm) maximum. The high side reach shall be 48 inches (1220 mm) maximum for a reach depth of 10 inches (255 mm) maximum. Where the reach depth exceeds 10 inches (255 mm), the high side reach shall be 46 inches (1170 mm) maximum for a reach depth of 24 inches (610 mm) maximum.

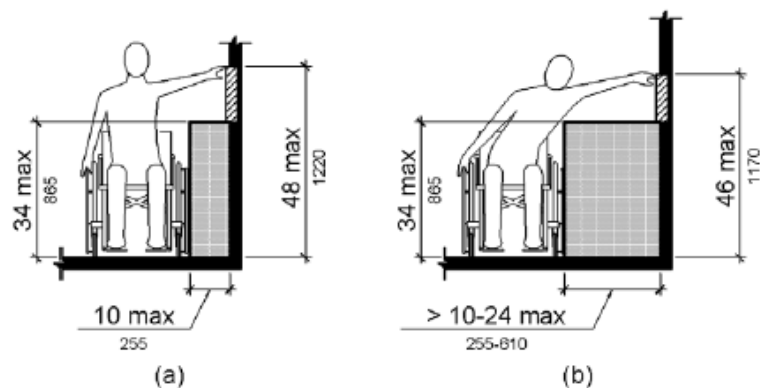


Figure 308.3.2 Obstructed High Side Reach

ATTACHMENT B

Rish Park Advocates for Accessibility

Items for Further Discussions

Item #1 – The family cabins are now unable to sleep six people, although they used to be able to do so comfortably. Can any changes be made to allow each of the two family cabins to sleep six people?

Item #2 – In the prior design of the family cabins, an accessible table for dining was placed near the kitchen. In the new design, that does not appear possible. Where is the planned location for an accessible dining table? Will this affect the flow of traffic through the living area? What are the dimensions of this table?

APD response:

We are a bit unclear as to the intent of this particular recommendation so would appreciate the opportunity to discuss further with you during our conference call.

Item #3 – Where is the TV/DVD player being placed? This is important for entertaining during bad weather. Please provide information on the size of the TV and its intended location.

Item #4 – Why were refrigerators without icemakers installed in the family cabins? Why is the size smaller than the previous refrigerators? This makes it difficult for families of four to six individuals to bring adequate food for up to three to five days, and requires park users to walk/roll a few hundred yards to the main cabin to access ice. What is the cost to replace the refrigerator with a larger one that makes ice?

Item #5 – Where will the furniture be placed in the living area? Will there be a clear path of travel for wheelchair users? Could you please provide details on what furniture will be available in each family cabin and the dimensions?

Item #6 – Why were cooking stoves removed from the group cabins? This limits their functionality and usability for families willing to stay in the group cabins.

Item #7 - All furniture should be put on wheels to enable guests to reposition as needed. This provides users with independence and allows for more flexibility that may be needed depending on the guests' various disabilities.

APD response:

If not properly locked, wheels on furniture have the potential to lead to falls if an individual puts his or weight on that furniture during transfers. As an alternative, APD staff are always on the premises and available to move furniture as necessary or upon request.

Item #8 – Was any thought given to changing the cabins to a rectangular shape to avoid some of the issues with the current shape? This is especially important for accessibility.

Item #9 - Designated boardwalk resting areas would greatly benefit from some fixed seating and table for relaxation. What is the cost for adding this seating and tables, which could be foldable?

APD response:

Although this is a wonderful suggestion, designated resting areas and outdoor furniture along the boardwalk are not within the current project scope. Keep in mind that fixed seating along the boardwalk would impact required spatial layout for accessibility so additional construction would be required. Since existing funds are not available for this project, this modification would need to be included within the Agency's Capital Improvement Plan (CIP).

Item #10 - It has been 14 years since APD removed the accessible basketball and miniature golf courts. There is an obligation to maintain accessible elements and these elements have not been replaced, nor are they currently articulated in phase 2. What costs are associated with each of these facilities?

APD response:

The miniature golf course and basketball court are included within the Agency's CIP and will be replaced upon legislative approval and funding availability.

ATTACHMENT C

Rish Park Advocates for Accessibility

Letter dated September 10, 2020 from Rich La Belle with Family Network on Disabilities/FND Trust Services.

Letter dated October 1, 2020 from Tom Rice with Agency for Persons with Disabilities.



September 10, 2020

The Hon. Barbara Palmer, Director
Agency for Persons with Disabilities
4030 Esplanade Way
Tallahassee, FL 32399-0950

Re: Rish Park

Dear Director Palmer:

I hope you and your family are well. The focus of this letter is to begin to build a much-needed conversation on Rish Park between the architects, contractors, experts on disability access, and park guests who have disabilities. This conversation is needed to ensure that the Florida ADA Building Code (ADA FBC) is correctly applied to the ongoing renovations and that reconstruction is performed in a manner that maximizes the accessibility of the park amenities for guests. We acknowledge that budget restrictions can pose a challenge when it comes to exceeding the minimum ADA FBC standards. However, each new or renovated element, like pool side changing rooms, boardwalk rest areas, and new family cabins, should at least meet the minimum requirements of the ADA FBC standards and, given the reputation of Rish Park, go beyond the minimum, as well as improve upon previous usability of the park.

I am writing to you, on behalf of FND, from the perspective of long-term advocates of the park. As one of Florida's few remaining cross-disability advocacy organizations, we serve all persons with disabilities of all ages. Many of those who we serve have enjoyed Rish Park in the past and are looking forward to it reopening. I and others continuously advocate on behalf of Rish Park and will continue to do so. Persons with Disabilities (PWDs) need a safe, accessible, and affordable location in which to get the much-needed recreational aspect of life, especially in these challenging times. The Park is much more than recreation and fulfills a fundamental part of any person's life. The Park promotes Persons with

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www.fndusa.org

Disabilities to be more active and improve their mental health, especially during this pandemic. Rish Park is the ideal location for individuals, families, and the community of persons with disabilities to enjoy barrier-free park and recreational outdoor activities.

As you know, there is no information on the Rish Park's website (www.Rishpark.org) about the progress of the park, other than it is closed and has been for two years. Moreover, the disability community is aware and has witnessed some significant activities at the Park. These observations have generated excitement and enthusiasm among the disability community regarding expected future and new barrier-free recreation opportunities at the park.

While it is encouraging that there is much needed reconstruction, we have concerns on the changes and request to have an initial telephone/zoom conference call with you and your staff to initiate dialogue and mitigate concerns. The concerns are focused on proper ADA FBC standards application for these improvements. Most important, we have concerns for Phase 2 activities to construct a new family cabin. We observed several ADA FBC errors/mistakes that are not acceptable for the modifications. We are requesting to develop a select steering committee of citizens, including past cabin users, to discuss how to maximize the return on investment and, at a minimum, meet the ADA FBC standard. The committee will assist the designers and contractors to identify specific inadequacies and ensure that these minimum standards are applied to provide solutions for accessibility issues.

Specific examples of our concerns include the following:

- 1) The three poolside and three Bayside changing rooms have no grab bars or changing benches within any of the six spaces. This applies to all dressing rooms, fitting rooms, and lockers found in 222 of the ADA FBC.
- 2) Toilets in family cabins do not have 24 proper clearance (36" x 36") to allow proper access on to toilet.
- 3) Designated boardwalk resting areas would greatly benefit from some fixed seating and table for relaxation
- 4) Renovations to the remaining family cabin reduced the overall square footage and may have inadvertently created interior traffic flow problems
 - a. The bedrooms will not allow access to both sides of the bed, which causes issues for transferring in and out of mobility devices
 - b. Customers may be relegated to one bedroom or the other based on their mobility preferences

- i. Someone missing their right arm or leg may be limited to only the left side of the bed.
- c. The bedrooms do not have closets, so shelving and/or dresser drawers will be essential and will need to be accessible with hooks and levers, not knobs
- d. The square footage in bedrooms has been reduced. Therefore, furniture placement will be critical to ensure accessibility throughout the room
- e. Additional electric outlets in the bedrooms may be needed to accommodate for multiple pieces of adaptive equipment (recharging power chairs, baby monitors, CPAP machines, ventilator, lift devices, or other electrical tools)
- f. A kitchen table would need to go in the main room, creating one-way flows of traffic for wheelchair users
 - i. In the previous design, the kitchen table was in the corner allowing for more open walkways
 - ii. It could benefit from an accessible work surface, rather than blocking the flow of traffic
- g. We recommend electronic controls for the window blinds because the evening sun comes directly in through the windows
 - i. Furniture positioning will most likely be against the walls, thus blocking access to manual controls for blinds/curtains
- h. It has been 14 years since APD removed the accessible basketball and miniature golf courts.
 - i. There is an obligation to maintain accessible elements and these elements have not been replaced, nor are they currently articulated in phase 2.
- i. All furniture should be put on wheels to enable guests to reposition as needed

Although the renovated spaces might meet the Florida Code, once furniture is installed, the usability and function of the spaces will be negatively impacted. Some, if not all, of the items above could unnecessarily expose APD and the State of Florida to litigation.


Moving forward with Phase 2, we are hopeful that we can improve upon both the accessibility and the usability of the second family cabin. After all, Phase 2 has not yet been built. Therefore, appropriate change orders can be made with relative ease. We know from geometry that the square and rectangular designs create 90° angles which work much better for mobility challenges than the octagon shapes.

Maybe there is a way to maintain the look of the property while maximizing 90° angles inside the structure to enable better access.

The next family cabin can be built better than the existing family cabin. We could also easily retrofit one of the group cabins to accommodate a much larger family than the normal family cabins. While it would not quite have the same amenities, it would still be functional with a fully operational kitchen.

We can harness the expertise of the park users and incorporate structural improvements for a more functional family centered space. We do hope that this positive critique is well received. We believe that Rish Park is a truly unique resource the rest of the United States will emulate. The State of Florida and the Agency for Persons with Disabilities can be leaders in providing the disability community recreational opportunities and outdoor access.

Thank you in advance for your leadership on this important issue. I may be reached at the FND main office (address above), by email at richlabelle@fndusa.org, or by cell – 727-688-0731.

Very truly yours,

Richard La Belle, Esq.
Chief Executive Officer



agency for persons with disabilities
State of Florida

Ron DeSantis
Governor

October 1, 2020

■ ■
Barbara Palmer
Director

Richard La Belle, Esq.
Chief Executive Officer
Family Network on Disabilities
26750 US Highway 19 N
Clearwater FL 33761

■ ■
State Office

■ ■
4030 Esplanade Way
Suite 380
Tallahassee
Florida
32399-0950

Dear Mr. La Belle,

On behalf of the Agency, I thank you for your comprehensive and thoughtful letter regarding improvements to Rish Park.

■ ■
(850) 488-4257
Fax:
(850) 922-6456

■ ■
Toll Free:
(866) APD-CARES
(866-273-2273)

I have shared and discussed your concerns and recommendations with staff from our General Services and Contract Administration units who are directly involved in Park-related issues. Following those discussions, I thought it would be beneficial to respond directly to each of the points you raised in your letter. Our responses are provided below and highlighted in yellow (immediately following the actual excerpts from your letter):

This conversation is needed to ensure that the Florida ADA Building Code (ADA FBC) is correctly applied to the ongoing renovations and that reconstruction is performed in a manner that maximizes the accessibility of the park amenities for guests. We acknowledge that budget restrictions can pose a challenge when it comes to exceeding the minimum ADA FBC standards. However, each new or renovated element, like pool side changing rooms, boardwalk rest areas, and new family cabins, should at least meet the minimum requirements of the ADA FBC standards and, given the reputation of Rish Park, go beyond the minimum, as well as improve upon previous usability of the park.

All requirements from both the Florida Building Code and Florida Accessibility Code (2017) have been strictly adhered to during renovations and repairs to the park. In addition, the project designs were reviewed and subsequently approved by the Gulf County Building Association, Department of Management Services, and the Agency. That being said, we share your desire to create an environment which exceeds minimum accessibility standards wherever possible and within available funding.

I am writing to you, on behalf of FND, from the perspective of long-term advocates of the park. As one of Florida's few remaining cross-disability advocacy organizations, we serve all persons with disabilities of all ages. Many of those who we serve have enjoyed Rish Park in the past and are looking forward to it reopening. I and others continuously advocate on behalf of Rish Park and will continue to do so. Persons with Disabilities (PWDs) need a safe, accessible, and affordable location in which to get the much-needed recreational aspect of life, especially in these challenging times. The Park is much more than recreation and fulfills a fundamental part of any person's life. The Park promotes Persons with Disabilities to be more active and improve their mental health, especially during this pandemic. Rish Park is the ideal location for individuals, families, and the community of persons with disabilities to enjoy barrier-free park and recreational outdoor activities.

We appreciate your kind words and agree that Rish Park is indeed a wonderful treasure.

As you know, there is no information on the Rish Park's website (www.Rishpark.org) about the progress of the park, other than it is closed and has been for two years.

Thank you for bringing this to our attention. The website has since been updated with notification of the closure, ongoing repairs, and an estimated re-opening date.

While it is encouraging that there is much needed reconstruction, we have concerns on the changes and request to have an initial telephone/zoom conference call with you and your staff to initiate dialogue and mitigate concerns. The concerns are focused on proper ADA FBC standards application for these improvements. Most important, we have concerns for Phase 2 activities to construct a new family cabin. We observed several ADA FBC errors/mistakes that are not acceptable for the modifications.

We would absolutely appreciate further discussion so that our staff, who have been working closely with the contractor, can be made aware of any errors or mistakes you believe have been made. Please provide us with some days and times you are available within the next week or so and we will set up a conference call.

We are requesting to develop a select steering committee of citizens, including past cabin users, to discuss how to maximize the return on investment and, at a minimum, meet the ADA FBC standard. The committee will assist the designers and contractors to identify specific

inadequacies and ensure that these minimum standards are applied to provide solutions for accessibility issues.

We always welcome input from park visitors to improve accessibility and our overall operations. We would definitely like to explore and discuss your idea of such a public committee or workgroup during our forthcoming conference call.

Specific examples of our concerns include the following:

- 1) *The three poolside and three Bayside changing rooms have no grab bars or changing benches within any of the six spaces. This applies to all dressing rooms, fitting rooms, and lockers found in 222 of the ADA FBC.*

As previously mentioned, all structures within the park meet required building codes.

Push button openers and transfer switches on the doors to the Dining Hall, as well as on all entry, exit and toilet doors, allow visitors to push a pad to have those doors automatically open for them.

Grab bars and/or changing benches are not required by the Florida Accessibility Code (2017). Additionally, Section 222 provides standards for dressing, fitting, and locker rooms and makes no mention of grab bars or changing benches. That being said, we do agree that the addition of grab bars has the potential to improve accessibility and enhance guest safety so we will certainly look into adding this feature using existing funds.

Adding benches to the changing rooms would significantly reduce the usable floor space and impede a visitor's ability to maneuver within that space (particularly if they use a wheelchair). Due to limited space, the changing rooms were designed to ensure privacy and subsequently equipped with lockable doors. These spaces were designed to ensure privacy for visitors who wish to change clothing when not accessing the bathroom areas.

Keep in mind that visitors always have the option of changing clothing within their cabins or one of the changing areas on the bay side of the park.

- 2) *Toilets in family cabins do not have 24 proper clearance (36" x 36") to allow proper access on to toilet.*

Renovated family cabin toilets have a 5-foot turning radius/clearance with grab bars. The approach to the bathroom was built at 30" x 48"

- 3) *Designated boardwalk resting areas would greatly benefit from some fixed seating and table for relaxation*

Although this is a wonderful suggestion, designated resting areas and outdoor furniture along the boardwalk are not within the current project scope. Keep in mind that fixed seating along the boardwalk would impact required spatial layout for accessibility so additional construction would be required. Since existing funds are not available for this project, this modification would need to be included within the Agency's Capital Improvement Plan (CIP).

- 4) *Renovations to the remaining family cabin reduced the overall square footage and may have inadvertently created interior traffic flow problems*

- a. *The bedrooms will not allow access to both sides of the bed, which causes issues for transferring in and out of mobility devices*
- b. *Customers may be relegated to one bedroom or the other based on their mobility preferences*
 - i. *Someone missing their right arm or leg may be limited to only the left side of the bed.*

Adopting these recommendations would reduce usable floor space and subsequently result in a decreased guest capacity within each cabin (pursuant to the Life Safety Code as monitored and enforced by local fire officials).

- c. *The bedrooms do not have closets, so shelving and/or dresser drawers will be essential and will need to be accessible with hooks and levers, not knobs*

This is a great suggestion and we will definitely explore the feasibility of replacing knobs with hooks or levers with (using existing funds).

- d. *The square footage in bedrooms has been reduced. Therefore, furniture placement will be critical to ensure accessibility throughout the room*

If you have recommendations for furniture placement, please let us know.

- e. *Additional electric outlets in the bedrooms may be needed to accommodate for multiple pieces of adaptive equipment (recharging power chairs, baby monitors, CPAP machines, ventilator, lift devices, or other electrical tools)*

This is another good idea and we will definitely look into adding more electrical outlets using existing funds.

- f. *A kitchen table would need to go in the main room, creating one-way flows of traffic for wheelchair users*
i. *In the previous design, the kitchen table was in the corner allowing for more open walkways*
ii. *It could benefit from an accessible work surface, rather than blocking the flow of traffic*

We are a bit unclear as to the intent of this particular recommendation so would appreciate the opportunity to discuss further with you during our conference call.

- g. *We recommend electronic controls for the window blinds because the evening sun comes directly in through the windows*
i. *Furniture positioning will most likely be against the walls, thus blocking access to manual controls for blinds/curtains*

This is another great suggestion and we will explore the feasibility of making this modification within existing funds.

- h. *It has been 14 years since APD removed the accessible basketball and miniature golf courts. There is an obligation to maintain accessible elements and these elements have not been replaced, nor are they currently articulated in phase 2.*

The miniature golf course and basketball court are included

within the Agency's CIP and will be replaced upon legislative approval and funding availability.

- i. *All furniture should be put on wheels to enable guests to reposition as needed*

If not properly locked, wheels on furniture have the potential to lead to falls if an individual puts his or weight on that furniture during transfers. As an alternative, APD staff are always on the premises and available to move furniture as necessary or upon request.

Moving forward with Phase 2, we are hopeful that we can improve upon both the accessibility and the usability of the second family cabin. After all, Phase 2 has not yet been built. Therefore, appropriate change orders can be made with relative ease.

A vendor was selected via the State's required procurement process and a scope of work has already been submitted and approved. At this late stage in the process, a change to the scope of work is not feasible and would exceed available funding.

We know from geometry that the square and rectangular designs create 90° angles which work much better for mobility challenges than the octagon shapes. Maybe there is a way to maintain the look of the property while maximizing 90° angles inside the structure to enable better access.

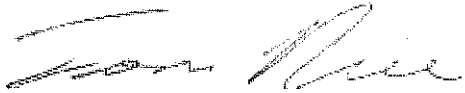
We would appreciate your suggestions in this area (which we will certainly consider with future renovations and/or capital improvements).

The next family cabin can be built better than the existing family cabin. We could also easily retrofit one of the group cabins to accommodate a much larger family than the normal family cabins. While it would not quite have the same amenities, it would still be functional with a fully operational kitchen.

Conversion of one or more group cabins to family cabins is an idea we have recently discussed and considered but will also need to be included within the Agency's CIP since existing funds are not available for this purpose.

Thank you again for your feedback. We look forward to a continuing dialog with the Family Network on Disabilities for making Rish Park a model for accessible recreational settings.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Tom Rice', with a stylized, cursive-like script.

Tom Rice
Deputy Director of Programs