

MAKING FACILITIES ACCESSIBLE FOR ALL

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Factories and warehouses often contain mezzanines, elevated spaces, platforms, and additional floors that provide space for storage, meeting rooms, lunchrooms, locker rooms, offices, and other non-mission-critical uses...uses which would otherwise occupy portions of valuable square footage on the main floor. In the past, such spaces did not necessarily have to be accessible by those with disabilities. Today, however, accessibility requirements from the Americans with Disabilities Act (ADA) have been incorporated into both the International Building Code (IBC), as well as state-specific building codes, thus requiring all buildings and spaces to be accessible via an elevator or ramp, with a few exceptions. These exceptions include:

- **Limited access spaces.** Spaces accessed only by ladders, catwalks, crawl spaces, freight elevators, or very narrow passageways are not required to be accessible.
- **Equipment spaces.** Spaces frequented only by service personnel for maintenance, repair or occasional monitoring of equipment are not required to be accessible.
- **Mezzanines less than 3,000 sq. ft.** Mezzanines less than 3,000 sq. ft. are exempt from accessibility requirements, however mezzanines that are 3,000 sq. ft. or larger must have at least one accessible route. In addition, facilities with one or more mezzanines with an aggregate area of more than 3,000 sq. ft. also may need to provide accessibility if not doing so would create an unequal accommodation as noted by the ADA.
- **Equipment platforms.** The building code makes a distinction between mezzanines and equipment platforms (see definitions in box at right). Because equipment platforms are unoccupied and are used exclusively to house equipment, they are not subject to the accessibility requirements of the code.

While implementing accessibility features does come with additional costs for both new and renovation projects, do not be tempted to not implement accessibility because “a person in a wheelchair couldn’t perform that job” or similar misconceptions. In fact, both the Building Code and the ADA are designed to prevent such assumptions about persons with disabilities: Unless an area is exempt from accessibility requirements as noted above, the space must be designed so that the disabled can approach, enter, and exit the area.

In fact, the ADA specifically prohibits denial of participation through unequal benefits, and participation as separate benefit. Therefore, any scenario denying access to the usability of the facility violates ADA requirements. Even if your company does not employ the disabled in positions where mezzanine or raised platform access may be needed, there are plenty of disabled trainers, consultants, inspectors and other personnel who may need to enter, use, and exit the space at some time. For example:

- An inaccessible mezzanine used as a training room, a lunchroom, an employee locker room, or even as a lookout for visitors to view the production floor is prohibited.
- A mezzanine without accessibility features used as a meeting room: It would be an unequal accommodation to simply broadcast a staff meeting to a disabled team member via a video feed since their experience of the meeting would be different from those who were able to attend in person.
- If product is being lifted by machinery, manually unloaded by people, and stored on a mezzanine, or if individuals are operating equipment daily on a mezzanine, then the mezzanine is occupied and therefore must be accessible. (Note that these tasks are different than the occasional maintenance, repair, or monitoring of equipment.)

- Just because a space is not used, or intended for use, by the public does not make it exempt from accessibility. Because accessibility requirements have been incorporated into the building code, all buildings must meet these requirements. In addition, the ADA, as a federal Civil Rights law, applies to Places of Public Accommodation (such as restaurants, hotels, movie theatres, etc.) and commercial facilities. Commercial facilities are defined as nonresidential facilities, including office buildings, factories, and warehouses, whose operations affect commerce.

Keep these requirements in mind to be ahead of the curve and be in compliance with both the law and the code.

2015 International Building Code Definitions

Accessible: a site, building, or facility that can be used by individuals with disabilities.

Mezzanine: an intermediate level or levels between the floor and ceiling of any story.

Equipment platform: an unoccupied, elevated platform used exclusively for mechanical systems or industrial process equipment including the associated elevated walkways, stairways, alternating tread devices, and ladders necessary to access the platform.

ADA: Originally enacted in 1990, the ADA mandates that all new construction and alterations to existing construction must be readily accessible and usable to individuals with disabilities.

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References

For more information, please see:

- 2015 International Building Code, Chapter 2
- 2015 International Building Code, Chapter 11, Sections 1101.2, 1103.1. and 1104.4
- Current state specific building codes and accessibility standards (e.g., 2012 Texas Accessibility Standards)
- The Americans with Disabilities Act (ADA) and the ADA Standards for Accessible Design
- ICC/ANSI A117.1 Accessible and Usable Buildings and Facilities – 2009, 2003: Verify applicable edition for the specific facility in question.