

Recommendations concerning the Application of the ADA

IP 2019.0737

Overview of Proposed Development:

- The development will consist of 100s of single family homes for rent, ranging from 5 bedrooms to 11 bedrooms.
- All short term rentals, all one ownership (for now anyway), all one management company, one central booking for all homes.
- New Construction. Currently under design.
- Amenities for each home of similar bedroom numbers will be the same (including pool/spa).
- Floor plans of the vacation rental homes were not provided for this phase of recommendations.

Resources: United States Department of Justice (DOJ) – governing authority for ADA
United States Access Board (Access Board) – author of the ADA Design Standards
2010 ADA Standards (Access Board written; DOJ adoption)
Guidance to the 2010 ADA Standards (DOJ document)
Federal Regulations for ADA Title III (28 CFR Part 36) (DOJ document)
Florida Statute 553.501-553.513 Florida Building Construction Standards Part V -
Accessibility by Handicap Persons
2012 Florida Accessibility Code for Building Construction (FACBC)

Question 1: The single family homes will have either private motor courts for parking (which will accommodate 3 – 6 vehicles, depending upon number of bedrooms), or will have a motor court shared by two houses (which will accommodate 6 – 12 vehicles, again dependent upon number of bedrooms).

At the Mobility Accessible homes, is it necessary to stripe and designate an accessible parking stall if the entire motor court is maintained at the 2.08% slope? Striping is not intended at any motor court. The concern is that striping specifically to designate an accessible parking stall at a rental home location with private parking may target potential guests as more vulnerable.

DOJ's literature provides parameters for residential parking; however, as the development falls within transient lodging, which traditionally is designed around large volume surface lots and garages, additional guidance was sought regarding intended smaller volume motor courts.

DOJ confirmed that if the motor courts are not going to be striped for any of the single family lodging, then it is not necessary to stripe the accessible parking space, as long as the slope is compliant and there is an accessible route from the motor court to the entrance of the lodging. However, the motor court should be large enough to accommodate an accessible van parking space, along with the spaces for the other vehicles. In other words, if the motor court serving a single family lodging with mobility features is meant to accommodate six vehicles, it should have enough space to accommodate one accessible van parking space and five regular vehicle spaces, at least.

As all Florida accessible parking stalls exceed the width requirements for a 'Van Accessible' stall, it is Interplan's recommendation to provide an adequately sized motor court at each Mobility Accessible home to accommodate an accessible parking stall of 12'-0" in width, as well as a 5'-0" wide access aisle, that connects to the accessible entrance to the home and is sloped at a maximum of 2.08% in all directions..

As discussed at the planning meeting on November 7, 2019, parking stalls will be provided at 1 stall per every 2 bedrooms, rounding up when odd numbered bedrooms are provided.

*Ex.: 5 bedrooms / 2 = 2.5 = 3 parking stalls
1 of which should be accessible at Mobility accessible homes*

Considerations: In the event that motor courts are striped at standard homes, then Mobility accessible motor courts will need to be striped, and accessible parking locations would then need to meet Florida striping requirements in addition to slope and accessible route requirements previously listed.

Joint motor courts, if provided, would need to be designed to accommodate Mobility Accessible home parking bearing in mind additional width requirements of accessible parking.

Question 2: In traditional single family detached homes, porches are not required to have guard rails until 30" above finish grade. The intention at Mobility Accessible homes is to provide ramping prior to the porch to make accessible grade changes from the street/ boulevard to the front porch.

If transient lodging Mobility Accessible homes are elevated to create a porch, at what height must these have guard rails? If a landing were provided prior to the "porch" that had the required handrails/ guard rails, would guard rails be required at the porch itself?

DOJ says the 2010 ADA accessible design standards do not have requirements for guard rails for porches; those requirements would come from building or safety codes. The ADA standards just have requirements for ramps, found in Section 405. Ramp runs with a rise greater than 6 inches must have compliant handrails. Handrails from ramp runs must extend over the landings, but handrails are not required for the entire ramp landing, per Section 505.10.1, though they can be used along landings, especially if providing edge protection along the landing according to Section 405.9.1. Edge protection is required along the edges of ramp landings as well as along the edges of ramp runs.

Based on the response by the DOJ, the inclusion of guard rails at the porch edges falls within the purview of the building and life safety codes for residential rental locations. Landings are required to maintain the width of the ramp, and extend 36" beyond the top of the ramp at a running and cross slope of 2.08%, maximum. Given the elevation change exceeding 6" in height, handrails with edge protection will be required on both sides of the ramp and landing, extending 12" beyond the top and bottom of the ramp.

Considerations: Installation of guard rails at porch edges should be evaluated against differentiating Mobility Accessible homes from standard homes. Potentially, edge protection and additional outdoor lighting to highlight the porch edge may be prudent as part of a risk management assessment.