

May 31, 2005

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R. Alexander Acosta, Assistant Attorney General
Civil Rights Division Department of Justice
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Submitted electronically on web site.

RE: CRT Docket No. 2004-DRS01; Comment on ANPRM Concerning Implementation of Revised ADA and ABA Guidelines Dear Assistant Attorney General Acosta:

Question 9 Barrier Removal – General affects of revised ADA Standards

Dear Assistant Attorney General Acosta:

Reference Van Accessible parking Figure 502.2 of the new ADAAG Section 502.

Since backing into a van accessible parking space is quite difficult for some people I think it is very bad form to show a figure illustrating the more difficult to use configuration. It is true that the model codes and new ADA/ABA AG do permit back-in van accessible parking configurations.

The following Advisory in the new document makes a case for this also.

"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."

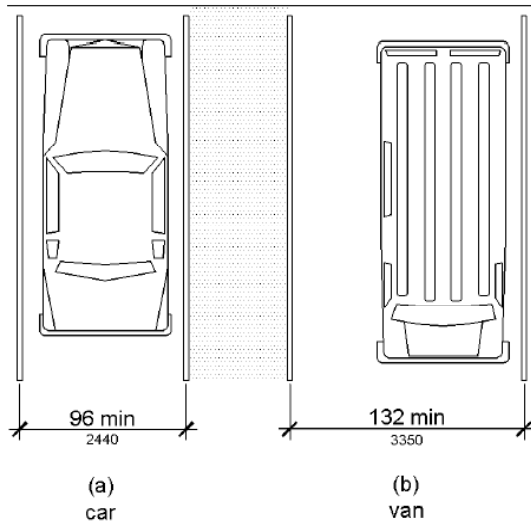


Figure 502.2
Vehicle Parking Spaces

Figure 502.2 from new ADA/ABA Access Guide Page 186.

I prefer the corresponding figure 502.2 from ICC/ANSI A117.1-2003 which has the van in a pull-in configuration. Please consider using the ANSI version in the new document. Or consider swapping the new AG figures 502.2 and 502.3 around so the pull-in version is first in Section 502.

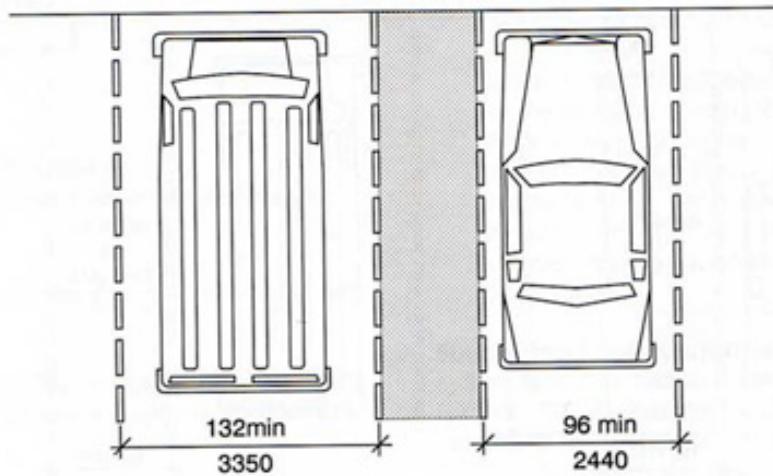


Fig. 502.2
Vehicle Parking Space Size

Figure 502.2 from ICC/ANSI A117.1-2003 Page 39 - copyright ICC.

Another issue is the change of first choice specification for van accessible parking to have a 132" wide parking space with a 60" access isle from the old (and still permitted) standard of 96" wide parking space with a 96" access isle. I think this is a major mistake

leading to even lower compliance and understanding by the layman, drivers, and business owners. They won't even notice the distinction of the wider parking spot and the access aisles will look the same. The old standard had the clearly obvious difference in access aisle widths which are quite noticeable to the layman. As a van driver in the drivers seat it will difficult to notice the 36" difference in parking spot width to know if it can provide the 96" required clear space for the wheel chair to exit the side lift platform.

The narrower access aisle may prevent a van backing into the right hand spot if a car (probably not a van) parks in the left hand spot closer than 36" to the center access aisle.

Consensus prepared specifications by experts are wonderful, but there is a dire need for "usability research" to verify the experts opinions. Do the experts only think of wheel chair users when working with parking specifications? Do they consider other users of disabled parking spots who walk? Advisory 208.2.2 applies in any parking location not only to rehabilitation facilities.

Advisory 208.2.2 Rehabilitation Facilities and Outpatient Physical Therapy Facilities. Conditions that affect mobility include conditions requiring the use or assistance of a brace, cane, crutch, prosthetic device, wheelchair, or powered mobility aid; arthritic, neurological, or orthopedic conditions that severely limit one's ability to walk; respiratory diseases and other conditions which may require the use of portable oxygen; and cardiac conditions that impose significant functional limitations.

Thanks for reading this.

Wayne Yarnall, President and Director, ADA Build it Right, Inc.