

# Site Accessibility Evaluation

## Americans with Disabilities Act Title II (Public Services: State and Local Government)



### Downtown Bus Terminal

127 E. Kiowa Street  
Colorado Springs, CO  
80903

Accessibility Evaluation

*Inspection Date: 06/14/2016*  
*Inspector: Michael Killebrew,*  
*Anna Kangas*

Prepared By



OLYMPIC CITY USA

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<https://coloradosprings.gov/>

TO: Mountain Metropolitan Transit

FROM: Robert L. Hernandez

DATE: January 15, 2020

SUBJECT: Downtown Bus Terminal Self-Evaluation

1. On Juen 14, 2016, Mr. Michael Killebrew, Title II ADA/Section 504 Coordinator performed a Title II - Americans with Disabilities Act (ADA), Self-Evaluation. This evaluation was in accordance with 1991/2010 ADA Standards for Accessible Design. The facility was re-evaluated on June 6, 2019 with the assistance of Anna Kangas, Architect/Title II ADA/Section 504 Coordinator.

2. Priorities for accessibility are assigned in accordance with the ADA Checklist for Existing Facilities. The checklist follows the four priorities listed in the Department of Justice ADA Title III regulations. These priorities are equally applicable to state and local government facilities:

Priority 1 - Accessible approach and entrance

Priority 2 - Access to goods and services

Priority 3 - Access to public toilet rooms

Priority 4 - Access to other items such as water fountains and public telephones

3. Corrective actions to findings were/will be submitted for corrective action through the city maintenance work request system and Transition Plan. Note: Recommended corrections in some cases where needed will be modified when appropriate. Corrections are developed in consideration of the "Program Access" provisions of Title II, where applicable.

4. A copy of this report will be maintained in the Office of Accessibility.

City of Colorado Springs Title II ADA/Section 504 – Manager  
30 S. Nevada Ave, Suite 301  
Colorado Springs, CO 80903  
robert.hernandez@coloradosprings.gov

Atch 1. City of Colorado Springs, ADA Self-Evaluation Report

Sincerely,



Robert Hernandez

**Exterior - Accessible Routes**

**Lat: 38.8349250000, Long: -104.8220235000**

**Finding: 1**

The domes are springy and are not firm. It may be due to the adhesive used.

*2010 ADAS Section 810.2.1  
Bus stop boarding and alighting areas shall have a firm, stable surface.*

**Citation:**

2010 ADAS Section: 810.2.1

**As Built:**

The domes at the loading area are not firm and are not installed in the appropriate manner.

**Recommendation:**

Remove and replace the domes so they are firm, limiting their use.

**Barrier Priority:**

1 (High): Should be completed immediately. (Includes findings that have little or no cost, were in violation of the codes at the time of construction, or pose an imminent safety threat)



Image of noncompliant dome pathway

## Exterior - Accessible Routes

**Lat: 38.8349250000, Long: -104.8220235000**

### Finding: 2

The east loading areas are acceptable.

The middle loading area has cross slopes from 3% to 4.5%.

The west loading area has cross slopes from 4% to 5.4%.

The loading zones have slopes greater than 1:48 (2%)

*2010 ADAS Section 503.4*

*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.*

### Citation:

2010 ADAS Section: 503.4

### As Built:

The loading zones have excessive slopes (over 2%).

### Recommendation:

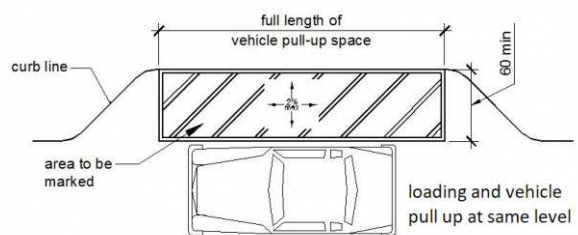
Remove and replace paving to provide maximum 2% cross slopes at the loading areas.

### Barrier Priority:

1 (High): Should be completed immediately. (Includes findings that have little or no cost, were in violation of the codes at the time of construction, or pose an imminent safety threat)



Image of bus loading zones



**Finding #2 Additional Finding Photos**



**Additional image of bus loading zones**

**Interior - Lobby**

**Lat: 38.8349250000, Long: -104.8220235000**

**Finding: 3**

The trip kiosk projects more than 4 inches into the circulation path.

Wall-mounted objects that have leading edges between 27 inches and 80 inches from the floor must not project more than 4 inches into the circulation path. Protruding objects that extend to the floor or within 27 inches of the floor are cane detectable and are therefore not hazardous. Where it is necessary or desirable to have objects protrude from the wall, a manner of cane detection must be provided.

*2010 ADAS Section 307.2*

*Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.*

**Citation:**

2010 ADAS Section: 307.2

**As Built:**

The trip kiosk protrudes 18" from the wall and the bottom edge is 29-1/4" above the floor.

**Recommendation:**

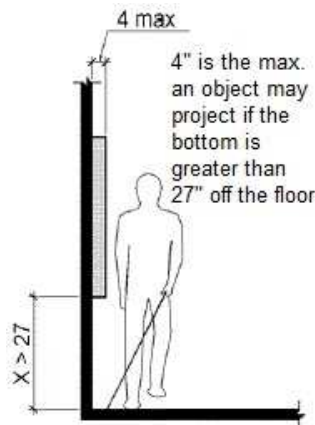
Lower the kiosk 2-1/4" so the bottom edge is at 27" maximum. Or install a cane detection panel that projects 2-1/4" below the bottom edge. If the kiosk is lowered, ensure it is mounted with exactly 27" knee clearance.

**Barrier Priority:**

2 (Important): Should be completed as soon as possible. (Includes findings that would remove barriers to the greatest number of people to your goods and services)



Image of trip kiosk projecting into path



**Interior - Lobby**

**Lat: 38.8349250000, Long: -104.8220235000**

**Finding: 4**

There is not enough knee clearance under the drinking fountain.

The drinking fountain must have a clear knee space between the bottom of the drinking fountain and the floor not less than 27 inches in height, 30 inches in width, and 8 inches in depth.

2010 ADAS Section 602.2

Units shall have a clear floor or ground space complying with 305 positioned for a forward approach and centered on the unit. Knee and toe clearance complying with 306 shall be provided.

**Citation:**

2010 ADAS Section: 602.2

**As Built:**

There is only 25" of knee clearance at the water fountain.

**Recommendation:**

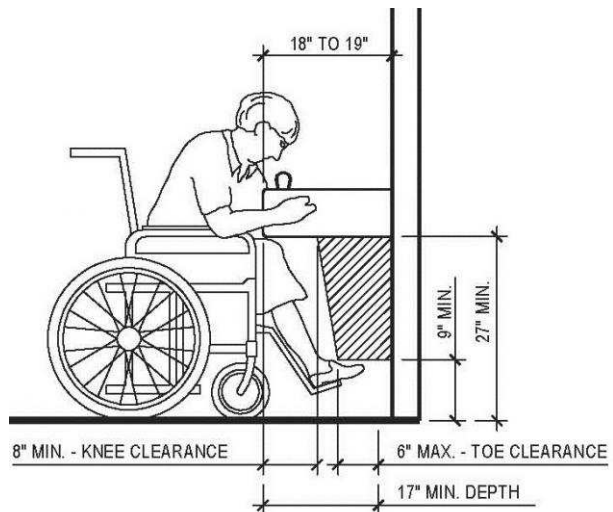
Raise the fountain by 2".

**Barrier Priority:**

4 (Low): Should be completed as soon as possible due to being a technical violation, but may not result in providing greater access to persons with disabilities. (Includes findings that are technically violations but provide a moderate to low increase in accessibility compared to the financial impact on the entity)



Image of noncompliant drinking fountain



**Interior - Lobby**

**Lat: 38.8349250000, Long: -104.8220235000**

**Finding: 5**

On the snack vending machine, the card reader is mounted at 58". On the soda machine, the card reader is mounted at 53-1/2".

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 maximum and the low side reach shall be 15 inches minimum above the finish floor or ground.

Where a forward reach is unobstructed, the high forward reach shall be 48 inches maximum and the low forward reach shall be 15 inches minimum above the finish floor or ground.

*2010 ADAS Section 308.1  
Reach ranges shall comply with 308.*

**Citation:**

2010 ADAS Section: 308.1

**As Built:**

The payment options are mounted too high on the vending machines.

**Recommendation:**

Work with the vendor to install compliant machine doors so that the operable controls are within reach range..

**Barrier Priority:**

4 (Low): Should be completed as soon as possible due to being a technical violation, but may not result in providing greater access to persons with disabilities. (Includes findings that are technically violations but provide a moderate to low increase in accessibility compared to the financial impact on the entity)

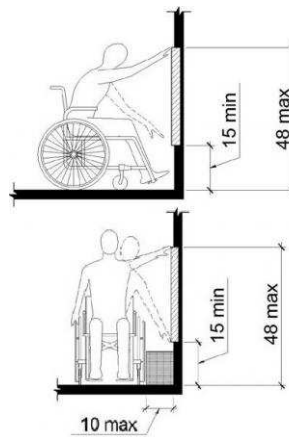
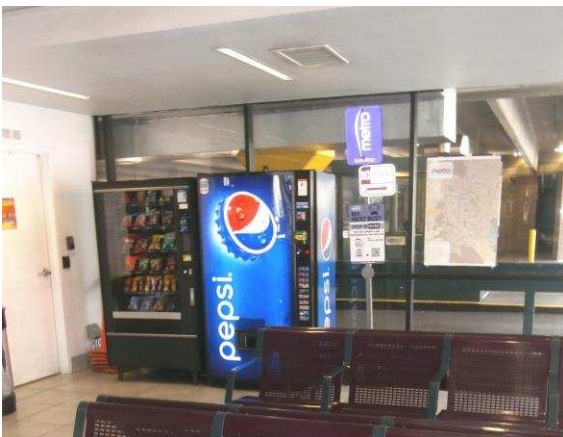


Image of inaccessible vending machines



**Men's Restroom**

**Lat: 38.8349250000, Long: -104.8220235000**

**Finding: 6**

The water and drain pipes under the lavatory are not adequately insulated.

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.

*2010 ADAS Section 606.5*

*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.*

**Citation:**

2010 ADAS Section: 606.5

**As Built:**

The lavatory pipes do not have insulation.

**Recommendation:**

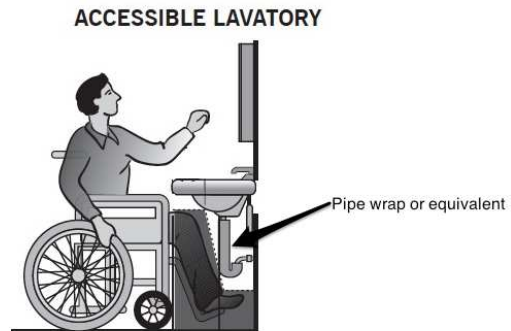
Insulate the pipes.

**Barrier Priority:**

3 (Moderate): Should be completed as soon as possible, but there may be other items that will provide greater access to persons with disabilities. (Includes findings that have a high financial impact on the entity in relationship to the degree of access provided)



Image of lavatory without pipe insulation



## Men's Restroom

Lat: 38.8349250000, Long: -104.8220235000

### Finding: 7

The manual paper towel dispenser projects more than 4 inches into the circulation path.

Wall-mounted objects that have leading edges between 27 inches and 80 inches from the floor must not project more than 4 inches into the circulation path. Protruding objects that extend to the floor or within 27 inches of the floor are cane detectable and are therefore not hazardous. Where it is necessary or desirable to have objects protrude from the wall, a manner of cane detection must be provided.

2010 ADAS Section 307.2

Objects with leading edges more than 27 inches (685 mm) and not more than 80 inches (2030 mm) above the finish floor or ground shall protrude 4 inches (100 mm) maximum horizontally into the circulation path.

#### Citation:

2010 ADAS Section: 307.2

#### As Built:

The manual paper towel dispenser protrudes 9-1/2" from the wall.

#### Recommendation:

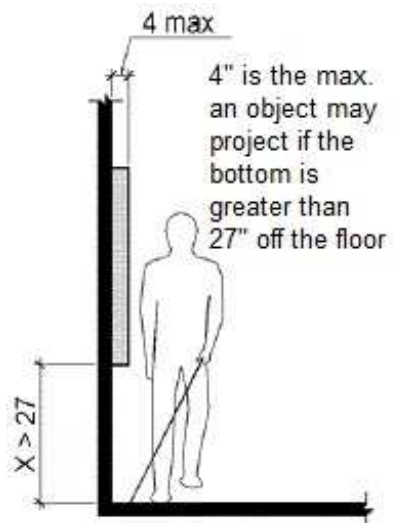
Relocate or remove the dispenser as there is not adequate cane protection from the dispenser.

#### Barrier Priority:

3 (Moderate): Should be completed as soon as possible, but there may be other items that will provide greater access to persons with disabilities. (Includes findings that have a high financial impact on the entity in relationship to the degree of access provided)



Image of paper towel dispenser projecting into path



## Men's Restroom

Lat: 38.8349250000, Long: -104.8220235000

### Finding: 8

The paper towel dispenser's operation mechanism is too high off the floor.

Dispensers must have all operable parts a maximum of 48 inches above the floor.

2010 ADAS Section 308.2.1

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.

### Citation:

2010 ADAS Section: 308.2.1

### As Built:

The manual paper towel dispenser is mounted at 50-1/2" to the operable parts.

### Recommendation:

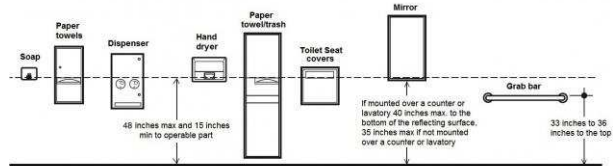
When the paper towel dispenser is relocated, lower it to maximum 48" to the operable part.

### Barrier Priority:

3 (Moderate): Should be completed as soon as possible, but there may be other items that will provide greater access to persons with disabilities. (Includes findings that have a high financial impact on the entity in relationship to the degree of access provided)



Image of paper towel dispenser mounted too high



## Men's Restroom

**Lat: 38.8349250000, Long: -104.8220235000**

### Finding: 9

The toilet compartment is not wide enough.

Toilet compartments must be a minimum of 60 inches in width.

*2010 ADAS Section 604.8.1.1*

*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.*

#### Citation:

2010 ADAS Section: 604.8.1.1

#### As Built:

The stall is 56" wide.

#### Recommendation:

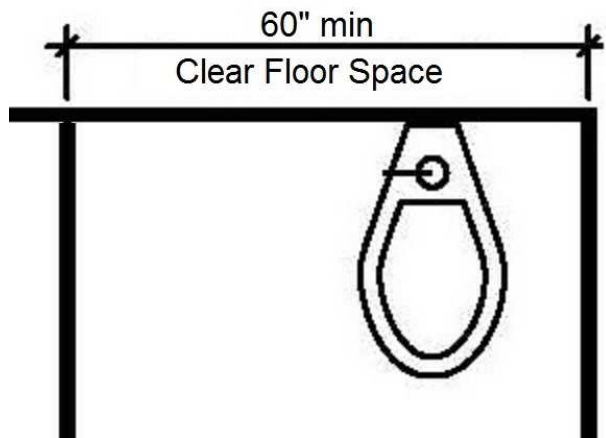
Reconfigure the restroom to provide a 60" wide stall.

#### Barrier Priority:

3 (Moderate): Should be completed as soon as possible, but there may be other items that will provide greater access to persons with disabilities. (Includes findings that have a high financial impact on the entity in relationship to the degree of access provided)



Image of narrow toilet stall



## **Men's Restroom**

**Lat: 38.8349250000, Long: -104.8220235000**

### **Finding: 10**

The toilet paper is not installed within the compliant range to the side of the toilet. The maximum side reach is 24".

Toilet paper dispensers shall be 7 inches minimum and 9 inches maximum in front of the water closet measured to the centerline of the dispenser. The outlet of the dispenser shall be 15 inches minimum and 48 inches 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. There shall be a clearance of 1 1/2 inches minimum below the grab bar.

*2010 ADAS Section 604.7*

*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.*

#### **Citation:**

2010 ADAS Section: 604.7

#### **As Built:**

The toilet paper is on the opposite wall from the grab bars, with a reach of 26".

#### **Recommendation:**

Relocate the toilet paper.

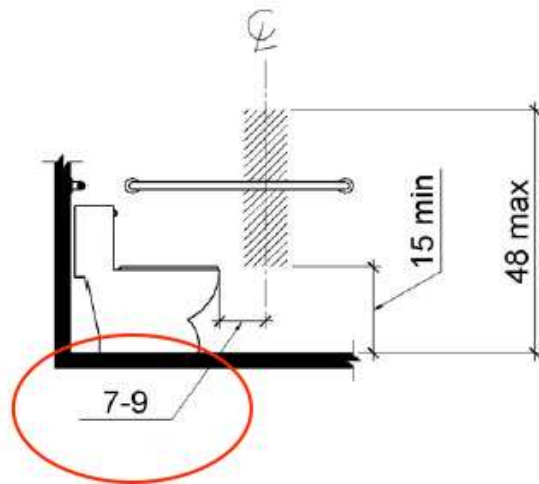
#### **Barrier Priority:**

3 (Moderate): Should be completed as soon as possible, but there may be other items that will provide greater access to persons with disabilities. (Includes findings that have a high financial impact on the entity in relationship to the degree of access provided)

**Finding #10 Continued**



Image of toilet paper installed too far from toilet



## Men's Restroom

Lat: 38.8349250000, Long: -104.8220235000

### Finding: 11

The coat hook is installed greater than 48 inches above the finished floor.

Where a forward reach is unobstructed, the high forward reach shall be 48 inches maximum above the finished floor.

2010 ADAS Section 308.2.1

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.

### Citation:

2010 ADAS Section: 308.2.1

### As Built:

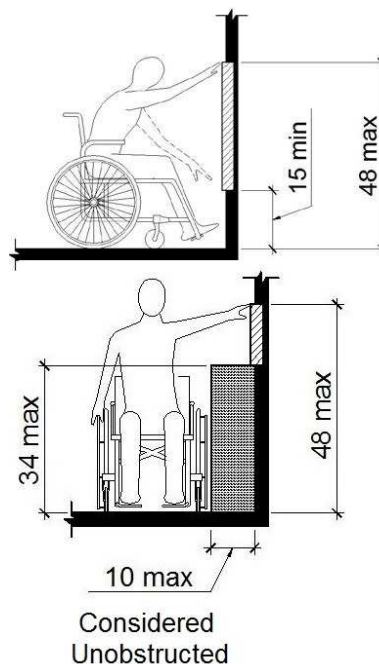
The coat hook is missing, but it was mounted at 64".

### Recommendation:

Install a coat hook at 48" maximum.

### Barrier Priority:

3 (Moderate): Should be completed as soon as possible, but there may be other items that will provide greater access to persons with disabilities. (Includes findings that have a high financial impact on the entity in relationship to the degree of access provided)



## Men's Restroom

Lat: 38.8349250000, Long: -104.8220235000

### Finding: 12

The rims of the urinals are too high.

Wall-hung urinals must be provided with an elongated rim projecting a minimum of 13 1/2 inches from the wall and a maximum of 17 inches above the floor.

2010 ADAS Section 605.2

Urinals shall be the stall-type or the wall-hung type with the rim 17 inches (430 mm) maximum above the finish floor or ground. Urinals shall be 13 1/2 inches (345 mm) deep minimum measured from the outer face of the urinal rim to the back of the fixture.

#### Citation:

2010 ADAS Section: 605.2

#### As Built:

The urinals are mounted at 18-1/4" to the rim.

#### Recommendation:

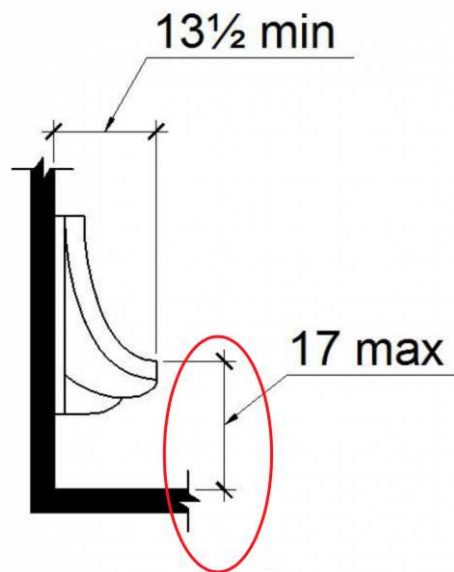
Lower one of the urinals to 17" maximum to the rim.

#### Barrier Priority:

3 (Moderate): Should be completed as soon as possible, but there may be other items that will provide greater access to persons with disabilities. (Includes findings that have a high financial impact on the entity in relationship to the degree of access provided)



Image of urinals mounted too high





## **Women's Restroom**

**Lat: 38.8349250000, Long: -104.8220235000**

### **Finding: 13**

The tactile sign is incorrectly located.

Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side.

*2010 ADAS Section 703.4.2*

*Where a tactile sign is provided at a door, the sign shall be located alongside the door at the latch side. Where a tactile sign is provided at double doors with one active leaf, the sign shall be located on the inactive leaf. Where a tactile sign is provided at double doors with two active leafs, the sign shall be located to the right of the right hand door. Where there is no wall space at the latch side of a single door or at the right side of double doors, signs shall be located on the nearest adjacent wall. Signs containing tactile characters shall be located so that a clear floor space of 18 inches (455 mm) minimum by 18 inches (455 mm) minimum, centered on the tactile characters, is provided beyond the arc of any door swing between the closed position and 45 degree open position.*

#### **Citation:**

**2010 ADAS Section: 703.4.2**

#### **As Built:**

The restroom sign is mounted on the pull side of door.

#### **Recommendation:**

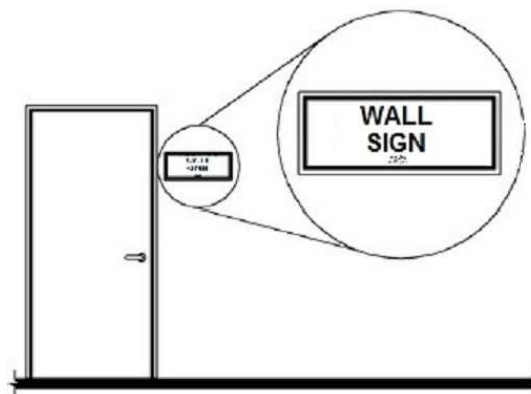
Move the sign to latch side of the door.

#### **Barrier Priority:**

**3 (Moderate):** Should be completed as soon as possible, but there may be other items that will provide greater access to persons with disabilities. (Includes findings that have a high financial impact on the entity in relationship to the degree of access provided)



Image of noncompliant restroom signage



## Women's Restroom

**Lat: 38.8349250000, Long: -104.8220235000**

### Finding: 14

The top rim of the lavatory is too high.

Only one of the lavatories has insulated pipes.

All lavatories that are designated to be accessible shall be a minimum 17 inches in horizontal depth and mounted with the rim or counter edge no higher than 34 inches above the finished floor.

*2010 ADAS Section 606.3*

*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.*

#### Citation:

2010 ADAS Section: 606.3

#### As Built:

The lavatory height is 34-1/2" to the rim.

#### Recommendation:

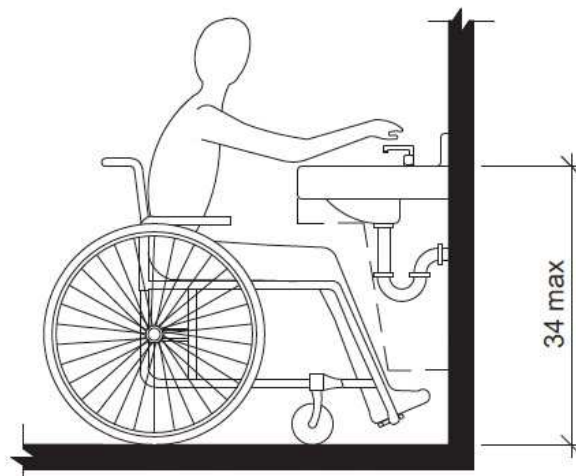
Lower the lavatory with insulated pipes to 34" maximum to the rim and then identify it as the accessible lavatory with an ISA sticker on the mirror.

#### Barrier Priority:

3 (Moderate): Should be completed as soon as possible, but there may be other items that will provide greater access to persons with disabilities. (Includes findings that have a high financial impact on the entity in relationship to the degree of access provided)



Image of noncompliant lavatory



## Women's Restroom

Lat: 38.8349250000, Long: -104.8220235000

### Finding: 15

The paper towel dispenser's operation mechanism is too high off the floor. At the time of this evaluation, the automatic towel dispenser was inoperable.

Dispensers must have all operable parts a maximum of 48 inches above the floor.

2010 ADAS Section 308.2.1

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.

#### Citation:

2010 ADAS Section: 308.2.1

#### As Built:

The manual paper towel dispenser is mounted at 55-1/4".

#### Recommendation:

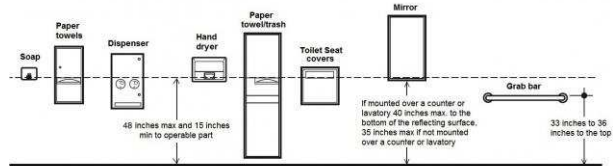
Lower the paper towel dispenser to 48" maximum.

#### Barrier Priority:

3 (Moderate): Should be completed as soon as possible, but there may be other items that will provide greater access to persons with disabilities. (Includes findings that have a high financial impact on the entity in relationship to the degree of access provided)



Image of paper towel dispenser mounted too high



## Women's Restroom

**Lat: 38.8349250000, Long: -104.8220235000**

### Finding: 16

The work surface is required to be at 34" maximum.

*2010 ADAS Section 308.3.1*

*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.*

#### Citation:

2010 ADAS Section: 308.3.1

#### As Built:

The work surface of the baby changing table is 38".

#### Recommendation:

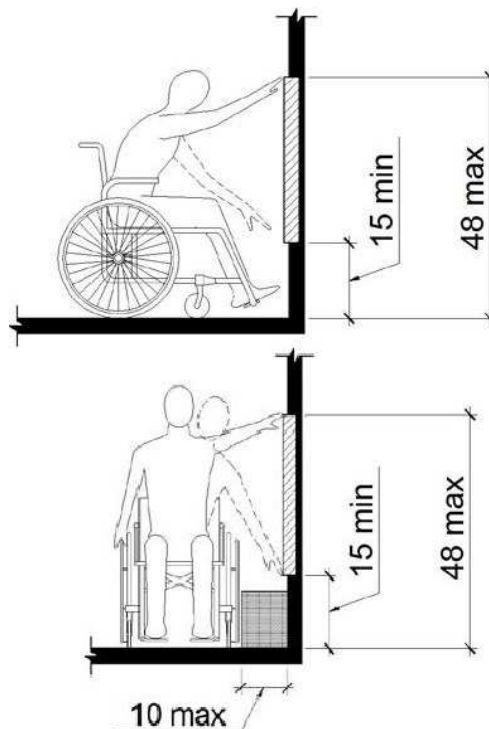
Lower the baby changing station, while providing at least 27" of knee clearance.

#### Barrier Priority:

3 (Moderate): Should be completed as soon as possible, but there may be other items that will provide greater access to persons with disabilities. (Includes findings that have a high financial impact on the entity in relationship to the degree of access provided)



Image of noncompliant diaper changing station



## Women's Restroom

Lat: 38.8349250000, Long: -104.8220235000

### Finding: 17

The toilet compartment is not wide enough.

Toilet compartments must be a minimum of 60 inches in width.

2010 ADAS Section 604.8.1.1

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.

#### Citation:

2010 ADAS Section: 604.8.1.1

#### As Built:

The toilet compartment ranges in width from 45-1/2" to 54".

#### Recommendation:

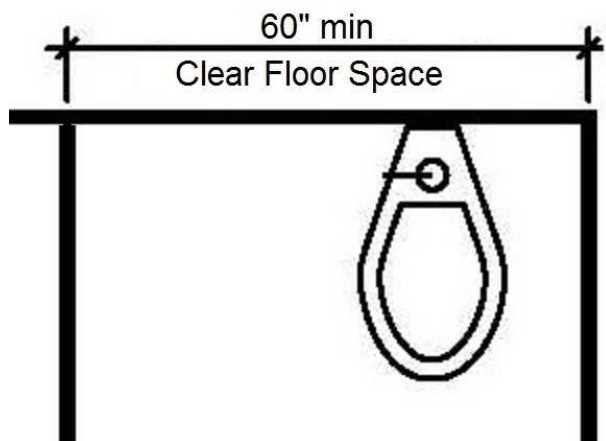
Reconfigure the restroom to provide a compliant width toilet stall.

#### Barrier Priority:

3 (Moderate): Should be completed as soon as possible, but there may be other items that will provide greater access to persons with disabilities. (Includes findings that have a high financial impact on the entity in relationship to the degree of access provided)



Image of narrow toilet stall



## Women's Restroom

**Lat: 38.8349250000, Long: -104.8220235000**

### Finding: 18

The toilet is not located within the range allowed from the side wall or partition, and it is angled to the wall.

The centerline of the toilet must be 16 to 18 inches from the side wall.

*2010 ADAS Section 604.2*

*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.*

#### Citation:

2010 ADAS Section: 604.2

#### As Built:

The toilet is 13-1/2" from the wall to centerline of toilet.

#### Recommendation:

Move the toilet and install it a consistent dimension from the wall.

#### Barrier Priority:

3 (Moderate): Should be completed as soon as possible, but there may be other items that will provide greater access to persons with disabilities. (Includes findings that have a high financial impact on the entity in relationship to the degree of access provided)



Image of toilet too close to wall

