



**ACCESSIBILITY GUIDELINES:**  
**EXTERIOR ALTERATIONS TO PROVIDE**  
**ACCESS FOR PERSONS WITH DISABILITIES**

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## **ACCESSIBILITY GUIDELINES: EXTERIOR ALTERATIONS TO PROVIDE ACCESS FOR PERSONS WITH DISABILITIES**

### A. Introduction

1. The Americans with Disabilities Act, which was signed in to law in 1990, requires equal opportunity for persons with disabilities in employment, government programs, telecommunications, transportation, and access to places of public accommodation and commercial facilities. The law prohibits discrimination on the basis of disability and targets the elimination of barriers to access in both new construction and existing facilities. Public accommodations and commercial facilities are required to be free of accessibility barriers when it is readily achievable to do so. "Readily achievable" is defined in the law as "easily accomplishable and able to be carried out without much difficulty or expense". When barrier removal is not readily achievable, goods and services must be made available through alternate methods that are readily achievable. Barrier removal that may not be readily achievable now, or under current operations, may be achievable at a later time.

2. Historic buildings are not exempt from the requirements of the Americans with Disabilities Act. Owners of historic structures must attempt to comply with the standard requirements and regulations of the law. However, historic preservation is also a mandated imperative. The goal is to reconcile the two, providing the maximum degree of accessibility to persons with disabilities without destroying the historically- or architecturally significant materials and features of the buildings involved.

3. These guidelines are limited to exterior work, because that is the extent of the the Historic Review Commission's authority. The ADA also requires that spaces and services inside buildings be accessible to persons with disabilities, and provides guidelines for providing that accessibility. Historic interior features and spaces must be respected as well; and in cases where Federal or State funds are involved, alterations must meet preservation standards and be reviewed by State (and sometimes Federal) preservation authorities.

### B. Planning and Review

1. Assess the historic and architectural significance of the property. The goal is to preserve the materials, style, and form of the building, as well as the principal facades and major features. Generally, secondary elements, finishes, or features, including later non-significant additions (some additions can be significant), previously altered sections, and utilitarian and service areas, may generally be altered without damaging the historic significance of the property.

2. Assess the existing and required level of accessibility, in accordance with the ADA Accessibility Guidelines.

3. Identify and evaluate the options within the context of preservation guidelines, to make the property as accessible as possible while conforming with preservation standards that recommend the retention of all significant features and materials. In exterior work, the goal is to provide an accessible path to the building and to make the main or prominent public entrance accessible, while retaining and protecting historic materials and features. All alterations should be in scale with and visually compatible with the building, and should be reversible (that is, if the modifications were removed, the original design would survive).

4. If the property is a City Historic Structure or is located in a City Historic District, submit an application to the Historic Review Commission (HRC) for its review and approval of all exterior alterations and repairs. The Commission has jurisdiction over the appearance of all exterior alterations to designated properties that can be seen from a public street or alley.

5. If the proposed modification includes the construction of a ramp in the public right-of-way, such as on a public sidewalk, then the applicant must first apply to the Department of Public Works (DPW), which will determine if the proposed ramp must be built on public property or can be built within the property in question. Only after DPW has been convinced of the need for the ramp and has issued a permit for it, and after City Council has passed an encroachment resolution, does the owner have the legal right to build in the public right-of-way. In doing so, the owner must meet the guidelines adopted by the City for ramps in the public right-of-way (summarized below). In addition, the HRC will review the design of the ramp, as it does all exterior alterations in City historic districts.

### C. Exterior

1. If the proposed modifications are appropriate to the historic building, the HRC will approve the project and issue a Certificate of Appropriateness, which the applicant needs to obtain a building permit for the work.

2. If the proposed modifications are not appropriate to the historic building, the HRC will not approve the project. The Commission may ask for alternatives to the proposal. If the HRC believes that the proposed modifications would threaten or destroy the building's significance, the HRC may suggest to the applicant the possibility of qualifying for the use of ADA-acceptable alternate minimum standards (which involves consultation with and approval by the State Bureau for Historic Preservation (BHP) in Harrisburg). The alternate minimum standards are outlined below.

3. In certain cases, compliance with even the alternate minimum standards will threaten or destroy the significance of a historic building. Additional alternate methods of providing access to the building's programs and activities may be used, after consultation with and concurrence by the BHP. This exception is expected to apply to only a very small number of properties.

#### D. Design Guidelines

1. Site: An accessible route from a parking lot, sidewalk, or public street to an accessible entrance is essential. The route must be at least three (3) feet wide, stable, firm, and slip-resistant. If the route has a slope that is less than 1:20 (one-inch rise for every twenty inches of length), then there is no requirement for railings. If existing steps and surrounding landscape features are not significant, then it may be possible to regrade the entry area to make an entrance accessible.

2. Ramps: A "ramp" is defined as a path with a slope greater than 1:20; the maximum allowable slope is 1:12 (*see alternate minimum standards above*). Any change in grade or level that is greater than one-half (1/2) inch must be accommodated by use of a ramp or a mechanical lift. Ramps must have landings (at least five-foot square) at the top and bottom of each ramp run, which may not be greater than thirty (30) feet in length. There must be two-inch-high curbs along the edges of ramps, and handrails must be provided on both sides of ramps at a height of 34 to 38 inches above the ramp surface. (*These are summarized requirements; please check the building and accessibility codes as well.*)

a. Ramps should be carefully designed and located to preserve the historic character of the structure to which they are being appended. They should be constructed of durable materials that are compatible with the materials of the building or structure to be served (usually concrete or stone). Masonry sidewalls may be appropriate with masonry ramps. They should not be made of wood, unless they will serve a one- or two-family house, and in all such cases the wood should be painted or stained. If a ramp is to join an existing set of steps, the material of the ramp surface and sides should be the same as that of the steps.

b. Handrails should be made of metal (but not wire or cable), if the ramp is masonry, or of wood if the ramp is wood. They should be simple and unobtrusive in design. The design should be taken from existing ornamental metal (or wood) elements elsewhere on the building, if possible. In order to prevent hazards to pedestrians, the vertical elements supporting the ends of railings should take the form of newel posts (so that they are highly visible), and the ends of railings should be returned so that there are no sharp protrusions.

c. Ramps in the public right-of-way, if permitted, may not be located any closer than five (5) feet from curbs, fire hydrants, poles (or any other obstructions in the sidewalk), building entrances and exits, or building corners. They may not be located within ten (10) feet of any bus stop.

3. Lifts: Non-mechanical means of overcoming physical barriers are preferable to mechanical devices like lifts, which are often visually intrusive and mechanically unreliable. However, in some instances where there is no room for a ramp, a vertical or inclined lift may be necessary. If they are deemed to be acceptable, lifts should be as inconspicuous as possible: disappearing into the ground, built into another feature, or painted to match adjoining materials.

4. Entrances: Whenever possible, access to a building should be through the primary public entrance. If this will threaten or destroy historic character-defining elements of the building, then at least one public entrance should be made accessible, and signs installed directing persons to it. Rear or service entries should not be the only accessible means of entry. If all else fails, it may be possible to design a new entrance into the structure that could be made accessible.

5. Doors: The ADA Accessibility Guidelines require that a doorway be 32 inches in clear width to be accessible to persons in wheelchairs. If the doors have been changed and are not historic, then it should be possible to redesign the entry and doors to be both accessible and compatible with the design of the building. However, under normal circumstances, historic doors and historic doorframes should not be removed or widened. They can be fitted with automatic door openers or new frictionless hinges, to make them easier to open. They can be fitted with offset hinges, so that the actual clear opening can be increased (by swinging the door out of the opening). Overly high door thresholds - greater than one-half (1/2) inch in height - can be altered by beveling, ramped with a wedge, or replaced to eliminate the barrier that they pose at doorways.

6. Signs: Directional signs or other signs indicating accessibility features shall be approved by the HRC as long as they are no larger than one foot in the longest dimension, and are installed without covering architectural features of the building and with a minimum of damage to the building.

#### E. Alternate minimum standards

1. In cases where it is determined that full adherence to the regular ADA guidelines would threaten or destroy the significance of a property that is listed in or eligible for listing in the National Register of Historic Places, or one that has been designated by the City, the following standards may be used, after consulting with the BHP and obtaining its and the HRC's approval.

a. A single accessible route may be provided from the site access point (a parking space, for example) to an accessible entrance.

b. For runs of no more than two feet, a ramp slope of 1:6 is acceptable, in lieu of the standard 1:12 slope limit.

c. At least one accessible entrance must be provided. If the historic principal public entrance can not be made accessible without threatening or destroying the significance of the building, an alternate unlocked entrance is acceptable, with signs directing users to that entrance, and with a notification system provided at the alternate entrance.

2. There are additional alternate minimum standards for accessibility in the interior of the building.

3. These guidelines are summaries, and are not intended to be complete descriptions of the code requirements for ramps and other building elements. Please consult the local building code and the ADA Accessibility Guidelines for a full listing of code requirements.

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