



## So Many Guidelines, So Little Time—Applying Accessibility Guidelines to Your Site

How did we end up with so many accessibility guidelines and standards? Which guidelines and standards apply to your site? The following information will demystify accessibility guidelines and standards.

### The History of Accessibility Guidelines

As explained in the previous chapter, accessibility laws have been enacted and updated since 1968. Here is a brief history of the guidelines for buildings:

- **American National Standards Institute (ANSI)—1969 to 1980.** The first accessibility guidelines used by Federal agencies under the Architectural Barriers Act (ABA).

- **General Services Administration Accessibility Guidelines—1980 to 1984.** The General Services Administration (GSA) developed its own set of guidelines for all buildings other than those of the Department of Housing and Urban Development, the Department of Defense, or the U.S. Postal Service. Those agencies developed their own guidelines.

- **Uniform Federal Accessibility Standards (UFAS)—1984 to 2006.** These standards updated and expanded the General Services Administration Accessibility Guidelines. The standards were adopted under the ABA, and apply to all federally funded facilities, unless there is a higher standard of accessibility for that type of structure required by other legal standards or guidelines.

- **Americans with Disabilities Act Accessibility Guidelines (ADAAG)—1991 to 2004.** The ADAAG explains how to apply the Americans with Disabilities Act (ADA) of 1990 in the built environment. These guidelines apply to services provided by State and local governments, and public accommodations, such as motels and hotels.

### Current Accessibility Guidelines

In 2004, the Architectural and Transportation Barriers Compliance Board (Access Board) finished updating and merging the UFAS and ADA accessibility guidelines. The combined *Americans with Disabilities Act/Architectural Barriers Act Accessibility Guidelines* are available at: <http://www.access-board.gov/ada-aba/>.

These guidelines apply to all Federal, State, and local government facilities and to public accommodations. In November 2005, the General Services Administration, the standard-setting agency for Forest Service facilities, adopted the ABA portion of the combined guidelines. The Architectural Barriers Act Accessibility Standard (ABAAS) is the name given by the GSA to the standards the Forest Service must follow. The ABAAS became effective on May 8, 2006.

*Chapter 1:* Explains when, where, and how many of each component must be accessible (scoping) for all entities under the ADA, including State and local government services and public accommodations.

*Chapter 2:* Explains when, where, and how many of each component must be accessible (scoping) for all entities under the ABA, including facilities that are built, bought, rented, or leased by, for, or on behalf of a Federal agency. The numbering for these scoping provisions begins with the letter *F* as a friendly reminder that they apply to federally related facilities.

*Chapters 3 through 10:* These chapters contain technical provisions that apply to entities governed by both the ADA and the ABA.

The Access Board is an independent Federal agency devoted to accessibility for people with disabilities. It operates with about 30 staff and a governing board of representatives from Federal departments and public members appointed by the President. Key responsibilities of the board include:

- Developing and maintaining accessibility requirements for the built environment, transit vehicles, telecommunications equipment, and for electronic and information technology
- Providing technical assistance and training on these guidelines and standards
- Enforcing accessibility standards for federally funded facilities

The Access Board developed the guidelines to serve as the basis for enforceable standards issued by four standard-setting agencies: the Department of Defense (DOD), the General Services Administration (GSA), the Department of Housing and Urban Development (HUD), and the U.S. Postal Service (USPS). The USDA and the Forest Service follow standards (the ABAAS) set by the GSA.

The Forest Service guidelines for outdoor elements and trails don't change an agency's responsibility to comply with the ABAAS. Agencies must comply with the ABAAS when designing or constructing any facility or component addressed by those standards. Drinking fountains, plumbed toilet facilities, parking lots and spaces, and cabins are among the components covered by the ABAAS.

## Accessibility Guidelines Under Development

The Access Board (<http://www.access-board.gov/>) is developing accessibility guidelines that will apply to special situations, such as passenger vessels, outdoor developed areas, and public rights-of-way. They will be chapters of the ABAAS when they become final.

The **public rights-of-way accessibility guidelines** (<http://www.access-board.gov/news/prowac/>) will cover access to sidewalks and streets, including cross-

walks, curb ramps, street furnishings, parking, and other components of public rights-of-way. These draft guidelines were proposed and submitted for comment during 2002.

## Guidelines for the Outdoor Environment

All of the guidelines and standards listed above, including the ABAAS, focus on facilities in highly developed areas, such as cities, towns, and major tourist attractions. With the exception of boating facilities and fishing piers and platforms, they don't provide direction for the construction or renovation of outdoor recreation areas and trails managed for hiker or pedestrian use.

In 1993, the Forest Service developed *Universal Access to Outdoor Recreation: A Design Guide* (called the Design Guide), which integrated the principles of universal design into all recreation settings. The Access Board also recognized the need for guidelines focused on outdoor recreation and formed a regulatory negotiation committee in 1997 to address the issue. The Forest Service was among the agencies and interest groups represented on the committee. The committee developed draft accessibility guidelines for outdoor developed areas. However, because the Access Board's regulatory negotiation committee's draft guidelines applied to all private, State, and Federal outdoor recreation areas, the rule-making process was delayed. While the draft guidelines were similar to the Forest Service guidelines in the Design Guide, the approach for incorporating accessibility into the outdoor environment differed significantly. In 2000, the Forest Service suspended use of the design guide because it tied accessibility to levels of development identified in the Recreation Opportunity Spectrum.

Because the Access Board's draft guidelines for outdoor recreation have not yet completed the rule-making process, the Forest Service has developed its own guide-



lines based on the Access Board's draft guidelines. These new agency accessibility guidelines for outdoor recreation and trails have completed the required directives process, including public comment. The Forest Service continues to work with the Access Board and other Federal agencies to complete national guidelines for outdoor recreation and trails that will apply to all Federal land management agencies.

When the Access Board finalizes its accessibility guidelines for outdoor developed areas, the Forest Service will revise the Forest Service Outdoor Recreation Accessibility Guidelines and the Forest Service Trail Accessibility Guidelines to incorporate the Access Board's standards, where those provisions are a higher standard, as supplemented by the Forest Service. The supplementation will ensure the agency's application of equivalent or higher guidelines and universal design, as well as consistent use of agency terminology and processes.

The **Forest Service Outdoor Recreation Accessibility Guidelines** (FSORAG) apply to newly constructed and

reconstructed camping facilities, picnic areas, beach access, outdoor recreation access routes (ORARs), and other constructed recreation features, such as picnic tables, benches, trash and recycling containers, viewing areas at overlooks, telescopes or periscopes, storage for assistive devices, remote area pit toilets, warming huts, outdoor rinsing showers, and so forth. These guidelines apply only within National Forest System boundaries. The entire text of the FSORAG is in the *Resources* section at the end of this guidebook.

The **Forest Service Trail Accessibility Guidelines** (FSTAG) apply to new or altered trails that are designed for hiker and pedestrian use and that connect either directly to a trailhead or to an accessible trail. These guidelines apply only within National Forest System boundaries. The entire text of the FSTAG is in the *Resources* section at the end of this guidebook.

Table 1 is a simplified overview of the application of the ABAAS, FSORAG, and FSTAG.



Table 1—Accessibility guidelines quick guide (which guideline applies where).

| ABA<br>Accessibility Standards   | Apply only within National Forest System boundaries   |  |
|--|---|--|
|  | FSORAG  | FSTAG  |
| <b>BUILDINGS,<br/>BOATING AND FISHING</b>  | <b>RECREATION SITE<br/>FEATURES</b>   | <b>HIKER/PEDESTRIAN<br/>TRAILS</b>   |
| <p><b>All buildings, including:</b></p> <ul style="list-style-type: none"> <li>• Administrative offices</li> <li>• Residences</li> <li>• Crew quarters</li> <li>• Visitor centers</li> <li>• Entrance stations</li> <li>• Parking lots</li> </ul> <p><b>And including components, such as:</b></p> <ul style="list-style-type: none"> <li>• Restrooms with and without running water</li> <li>• Workstations</li> <li>• Doors</li> <li>• Operating controls (door handles, faucets controls, thermostats, and so forth)</li> </ul> <p><b>Boating and fishing facilities, including:</b></p> <ul style="list-style-type: none"> <li>• Boating facilities</li> <li>• Docks</li> <li>• Fishing piers and platforms</li> </ul> | <p><b>New or reconstructed:</b></p> <ul style="list-style-type: none"> <li>• Picnic areas</li> <li>• Fire rings</li> <li>• Grills</li> <li>• Wood stoves</li> <li>• Benches</li> <li>• Outdoor recreation access routes</li> <li>• Camping units (eating and cooking areas, parking spurs, platforms, tent pads)</li> <li>• Campground utility connections</li> <li>• Water hydrants and drinking fountains</li> <li>• Outdoor rinsing showers</li> <li>• Remote-area pit toilets</li> <li>• Trash/recycling containers</li> <li>• Viewing areas and overlooks</li> <li>• Telescopes and periscopes</li> <li>• Mobility device storage</li> <li>• Warming huts</li> </ul> | <p><b>New or altered trails that are:</b></p> <ul style="list-style-type: none"> <li>• Designed for hiker/pedestrian use and</li> <li>• That connect either directly to a trailhead or</li> <li>• Connect to a currently accessible trail</li> </ul> |

### What If the Guidelines Appear to Conflict With Each Other?

It may appear that some accessibility guidelines conflict with other guidelines or codes, or with the realities of the outdoor environment. Railings must be high enough to protect visitors from a dropoff, but railings that high might limit the viewing opportunity for a person using a wheelchair, so which requirement takes priority? Trash receptacles are supposed to be accessible so that everyone can use them, but then how do we keep bears out? Hand pumps are vital to drawing water in campgrounds

where the water system isn't pressurized, but operating the long handle of the traditional pump requires more force and a longer reach than allowed by accessibility requirements. Roads that have restrictions or closures to use by motorized vehicles may be open to foot travel, so how can a road be gated or bermed to keep out vehicles but still allow access by a person using a wheelchair? When you are faced with these types of situations, stop and think carefully about the issues. The solution always

comes back to ensuring safety, abiding by the regulations, and doing so in a manner that includes the needs of all people.

**Railings and Safety:** Accessibility never supersedes the requirements for safety. This issue most commonly arises at overlook areas, on viewing structures, and in similar locations. For safety, the International Building Code (IBC) (<http://www.iccsafe.org/>) section 1003.2.12 contains requirements for guardrail height and the spacing of rails at dropoffs. This requirement provides opportunities for creative design and for managers and designers to think seriously about the level of development that is appropriate for the setting. The creativity challenge is to provide safety when designing the railing or structure adjacent to the dropoff, while maximizing viewing opportunities. Methods of solving this challenge are discussed in *Viewing Areas at Overlooks*.



**TERMINOLOGY TIP—**

***What's the difference between a guardrail, a handrail, and a grab bar?***

The following explanations of terms are based on the use of these terms in the International Building Code and the Architectural Barriers Act Accessibility Standards. Keeping these explanations in mind and using them as they are used in the codes, standards, and guidelines will help everyone communicate more effectively.

**Guardrails** protect people from dropoffs higher than 30 inches (760 millimeters). Guardrails must be at least 42 inches (1,065 millimeters) high. If the guardrail has openings that are less than 34 inches (865 millimeters) above the walking surface, they must be small enough to prevent a 4-inch (100-millimeter) sphere from passing through them (figure 11).

*Continued* ➤

Requirements for guardrails are detailed in the International Building Code section 1003.2.12.

**Handrails** provide a steady support for persons who are going up or down stairs or inclines. Handrails must be between 34 inches (865 millimeters) and 38 inches (965 millimeters) above the walking surface and be easy to grip. Details about acceptable configurations for handrails are provided in the International Building Code section 1003.3.3.11 and in the Architectural Barriers Act Accessibility Standards section 505.

**Grab bars** provide stability and allow people to use their arms to help them move short distances. The most common location for grab bars is in restrooms. The required locations of grab bars are explained in the Architectural Barriers Act Accessibility Standards chapter 6. Details about grab bar configuration and attachment are provided in the Architectural Barriers Act Accessibility Standards section 609 and in the International Building Code chapter 11.

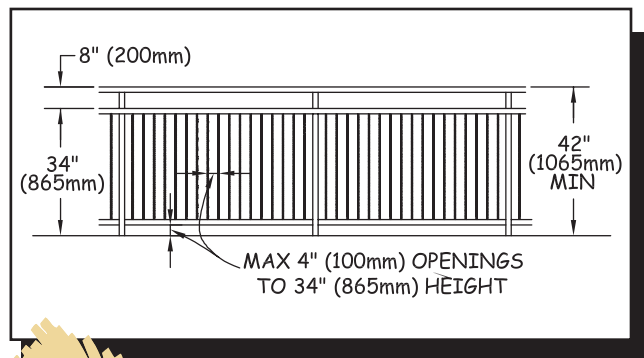


Figure 11—Dimensions required for guardrails.

Reconsidering the **level of development** at a site may be another way to balance safety and accessibility issues. It may not always be appropriate to provide paved paths and interpretive signs. When signs indicate a scenic

viewpoint and a paved pathway begins at the parking lot, visitors are likely to stop, pile out of their vehicle, and head down that pathway, often with the children running ahead. Because of the high level of development at the entrance to the pathway, visitors expect that the viewpoint will have a similar high level of development, including safety features. Development should be consistent at both ends of the pathway.

If the area isn't developed, such as a waterfall in the forest with no signs or constructed trail to it, it may not be appropriate to develop a viewpoint. Some scenic areas should remain natural so that people have the opportunity of adventure and solitude. The safety and accessibility requirements only apply when constructed features are added to the setting.

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Safety is also the primary issue when it comes to the accessibility of **trash receptacles**. In bear country, trash and recycling containers must be designed to keep bears out to minimize contacts between bears and humans. Operating controls for these containers require more force than is allowed for accessible operation. Until bear-resistant trash and recycling containers are available that comply with the technical provision for accessible operating controls, recreation areas where bears and other large animals pose a risk to humans are exempt from this provision. Incidentally, dumpsters—the big containers that are mechanically lifted and tipped to empty into commercial garbage trucks—are exempted from accessibility guidelines. More information about trash receptacles is in *Trash, Recycling, and Other Essential Containers*.

**Handpumps** also have been a concern (figure 12). Because of the piston-like pump mechanism, handpumps require a long reach. As the depth of the well increases, so does the force necessary to draw water, so most hand pumps require a force greater than 5 pounds (2.2 newtons) to operate. The good news is that an accessible handpump has now been developed and is available for



Figure 12—Others used to have to do the pumping.

purchase. For shallower wells, this pump can draw the water while remaining in full compliance with the grasping, turning, and pressure restrictions of the accessibility guidelines (figure 13). More information about the new



Figure 13—Now the choice of who does the pumping is up to the campers.

pump is available at: <http://www.fs.fed.us/t-d/programs/eng/handpump.htm> (Username: t-d Password: t-d).

For wells with a static water depth of 50 feet (12 meters) or less, use the accessible handpump for all new installations. Accessible pumps for deeper wells are being developed and should be used when they become available.

When **gates, barriers, or berms** are installed on a road to close it to motorized traffic but foot travel is encouraged beyond the closure, people in wheelchairs must be able to get behind the closure, as required by Section 504 of the Rehabilitation Act of 1973. As explained in Program Accessibility, a wheelchair is permitted anywhere foot travel is permitted.

When foot travel is encouraged beyond a closure, the USDA Office of General Counsel has determined that a minimum of 32 inches (815 millimeters) of clear passage must be provided around the gate, berm, or other restrictive device to ensure that a person who uses a wheelchair can participate in the opportunity behind the restriction. This width is the minimum required for a door under the ABAAS. Various methods can provide passage around a restrictive device (figures 14, 15, and 16).

Indications that foot travel has been encouraged include:

- Destination signing
- A pedestrian recreation symbol without a slash
- A Forest Service map that highlights an opportunity behind the closure
- A transportation management objective or recreation management objective stating that pedestrian use is encouraged

In areas where foot travel isn't encouraged, but occasional pedestrian use is allowed before and after installation of the restriction device, individuals who use wheelchairs may raise a concern about access at those restriction devices. In such cases, we must work with the individuals to provide access around the barrier.



Figure 14.

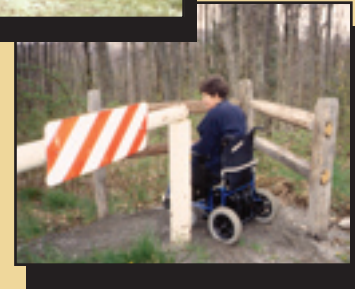


Figure 15.



Figure 16.

Figures 14, 15, and 16—Three ways to get around a road closure gate