

(1)

Re: Code to allow our unisex rrs

De : **Hollynn D'Lil** (Hdlil@comcast.net)

Envoyé : jeu. 04/06/09 16:57

À : **Jody James** (gratonia@hotmail.com)

Hi Jody. Here's what the code says on the wall surface:

**CA Title 24, Section 1115B.3.2.5. Interior surfaces. In other than dwelling units, toilet room floors shall have a smooth, hard, nonabsorbent surface such as Portland cement, concrete, ceramic tile or other approved material**

**which extends upward onto the walls at least 5 inches (127 mm). Walls within water closet compartments and walls within 24 inches (610 mm) of the front and sides of urinals shall be similarly finished to a height of 48 inches (1219 mm) and, except for structural elements, the materials used in such walls shall be a type which is not adversely affected by moisture.**

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## DeWayne Starnes

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**From:** Hollynn D'Lil [Hdlil@comcast.net]  
**Sent:** July 02, 2009 10:49 AM  
**To:** DeWayne Starnes  
**Cc:** Jody James  
**Subject:** Graton Community Club circle/triangle

Dear Mr. Starnes; Well, I guess we have our answer about routing out the pocket door frame to accommodate a raised circle/triangle. As Jody James states below, the pocket frame has metal edges and cannot be routed without destroying the integrity of the frame.

May we now request an exception based upon an unreasonable hardship? Our equivalent facilitation would be that tactile information will be provided on the wall in raised letters and Braille.

Since the passage of the ADAAG, persons with no vision are accustomed to finding tactile information on the wall beside a door. They do not seek tactile information on the door itself, for obvious safety reasons. Raised letters and Braille tactile information on the wall beside the door, centered at 60 inches AFF has become such a standard since the early 90's, that redundant tactile information on the door itself is not useful.

Thank again for your consideration. We look forward to your response.

Sincerely,  
Hollynn D'Lil  
(707) 829 9440

----- Original Message -----

**From:** Jody James  
**To:** Hollynn Graton Column  
**Sent:** Wednesday, July 01, 2009 5:47 PM  
**Subject:** Starnes last response about signage

Please note that the pocket door frame is a thin metal rail at that edge and cannot be routed out without compromising the integrity of the frame/wall.

Jody James, L.Ac.  
Phone/fax: 707-823-2866  
[www.AcupunctureGoddess.com](http://www.AcupunctureGoddess.com)

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## DeWayne Starnes

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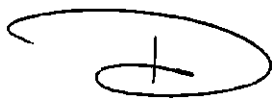
**To:** Hollynn D'Lil  
**Cc:** Jody James; lesatanner; Barbara Jeppesen; Dorothy Olsen  
**Subject:** RE: Graton Community Club

Ms. D'Lil

I want respond as I believe a little more clarification is needed. With respect to signage, based on the fact that you may be able to notch the door jamb to accommodate the compliant signage thickness, you would not be able to claim a hardship unless this cannot be done without reconstructing the pocket wall. So I would first determine whether or not this relatively simple solution can physically be done. If you determine that option is not feasible or possible, then tell me so and I will approve the alternative based on a hardship, but I think you really need to take that first step in making that determination. With respect to the raised letters, I read the code a little differently. **Section 1115B.6 Identification Symbols** states in part; *"Doorways leading to sanitary facilities shall be identified by a geometric symbol in compliance with this section. Geometric symbols shall be centered horizontally on the door at a height of 60 inches"* There is an additional reference at the end of this section referring the reader to Section 1117B.5.1 for additional signage requirements and further reference to **Section 1117B.5.5 Raised characters and pictorial symbol signs** where the 1/32 inch is specified. The logical progression of these code sections do not differentiate between wall or door symbols. If you are able to show me a specific code reference to your claim, I would be more than happy to stand corrected. As I indicated, the color of the sign can be different from the standard blue & white, but must be *"light on dark or dark on light"* and be color contrasting with the door and wall.

For the walls, the plexiglass conforming to the dimensional requirements of the code will meet the code for smooth and hard surface.

For the floor, I am trying to give you guidance without researching an alternate material such as the polyurethane (which I didn't evaluate because the current floor does not meet the intent of the code, so I wasn't going to waste time and the Club's money on researching further). To the extent that you can conform to the code, coving up the wall with a material specified in the code 6 inches onto the wall, that would be great. If you are placing a smooth sheet of some sort to the wood which can be coved up the wall, this may well meet the intent of the code. Again, let me know what your plan will be and I may be able to approve the material without charging the fee. The fee would only be charged if I can't readily make an evaluation without researching the proposed material or method. I hope this has provided better clarification.



DeWayne Starnes, PE, CBO  
Deputy Director, Chief Building Official  
Sonoma County  
Permit & Resource Management Department  
2550 Ventura Avenue  
Santa Rosa, CA 95403  
(707) 565-1900 Main

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**From:** Hollynn D'Lil [mailto:Hdlil@comcast.net]  
**Sent:** July 01, 2009 9:23 AM  
**To:** DeWayne Starnes  
**Cc:** Jody James; lesatanner; Barbara Jeppesen; Dorothy Olsen  
**Subject:** Re: Graton Community Club

Thank you for your extensive and thoughtful reply, DeWayne. We very much appreciate your time and efforts to assist us.

I would like to confirm, then, what it is we will do to be in accord with your review:

**Signage:** For the circles and triangles on the pocket door, we will provide a tactile demarcation that is less than the 1/2 inch that would ordinarily occur when a 1/4 inch triangle is imposed on a 1/4 inch circle. To be clear, we will NOT be providing raised letters and Braille on the circle/triangle. Raised letters and Braille are required only on the wall beside the door. The circle/triangle will be in different color contrast to the door, which will be white.

The raised letter and Braille signs on the wall on the latch side of the doors will be ordered from the company specs which we provided for your review. They were items 6 and 7. They will be in white with the raised letters and symbols in brown.

**Walls:** For two feet around the toilet in the accessible unisex restroom, we will place sheets of plexiglass 48 inches high. The plexiglass will extend two feet beyond the toilet on the back wall, and to the door opening on the side wall.

**Floors:** We will either pay the \$306 fee and request a review of various materials that we can apply to the wooden floors, or we will cover the wooden floors in the unisex restrooms with vinyl or other materials that will cover the floor and cove up on the walls 6 inches. The floor in the waiting area will remain wooden, as it is not in a restroom.

Your response to confirm would be most helpful. If we do not receive a response, we will assume you agree and that in the interest of saving time are not responding.

Thank you again and your time and consideration.

Hollynn D'Lil  
(707) 829 95440

----- Original Message -----

**From:** DeWayne Starnes  
**To:** 'Hollynn D'Lil'  
**Cc:** John DeCourcy ; Susan Upchurch  
**Sent:** Tuesday, June 30, 2009 2:27 PM  
**Subject:** RE: Graton Community Club

Ms. D'Lil

Attached is my response to the request, a hard copy will be sent out in today's mail.



DeWayne Starnes, PE, CBO  
Deputy Director, Chief Building Official  
Sonoma County  
Permit & Resource Management Department  
2550 Ventura Avenue  
Santa Rosa, CA 95403  
(707) 565-1900 Main  
(707) 565-1103 Fax

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**From:** Hollynn D'Lil [mailto:Hdlil@comcast.net]  
**Sent:** June 26, 2009 12:59 PM  
**To:** DeWayne Starnes  
**Subject:** Graton Community Club

Dear Mr. Starnes: My name is Hollynn D'Lil. I believe we met several years ago at a California Building Standards Commission meeting. I have attached my professional resume for your consideration.

I am a member of the Graton Community Club and have been assisting with the barrier-removal project for the restrooms in the club building. Jody James, our project manager has presented to you a request for an exception to Chapter 11B requirements for circles and triangles on restroom doors. She asked me to contact you personally to further explain our request.

I developed the request based upon my knowledge and experience in helping to write the first set of accessibility standards in California that were first promulgated in 1982. During the year of 1981, I worked as a coordinator for a 24-organization coalition to provide input from the disability community in what was to become Chapter 11B. The coalition and CalBO developed a 30-page mutual position paper on the proposed standards that we submitted to the State Architect. Our mutual position on many issues did have an effect.

(In 1981, we were working amendments to various chapters of Title 24. I still have the battered copy of the first standards published by the State Building Standards Commission and State and Consumer Services Agency.)

In 1981, the Center for the Partially Sighted came to our coalition meetings and submitted the proposed standards for the circles and triangles. The rationale was that the color contrast of the circles and triangles would indicate the gender of the restrooms and by raising the circle and triangle 1/4 inch, the same information would be provided

for persons who are blind. Blind persons could touch the surface of the door to receive the information tactilely.

However, though California standards were studied closely in the development of the Americans with Disabilities Act Accessibility Guidelines, input from blind organizations proposed the raised letters and Braille standard for providing information for persons who are blind. The rationale for placing the raised letters and Braille on the wall, rather than on the door itself, was that persons who are touching the door itself for tactile information might be injured if someone on the other side opened the door. Therefore, the ADAAG requires information for persons who are blind to be placed on the wall.

California is the only state that provides information for persons with low vision on the restroom doors themselves. When California incorporated the ADAAG requirements for raised letters and Braille into Chapter 11B in 1994, the requirement that the circles and triangles be raised also became redundant. However, California kept the circles and triangles as a way to provide information to people of low vision, as people with no vision are accommodated by the raised letters and Braille.

That is why I have advised the Graton Community Club to ask for an exception to the requirement that the circle with a triangle imposed for the pocket door entrance to the accessible unisex restroom be raised 1/4 inch. Sufficient information for those needing tactile information will be provided by placing raised letter and Braille signs on the wall beside the pocket door.

If we place a circle that is 1/4 inch with a triangle imposed that is 1/4 inch in depth, we will have a total depth of 1/2 inch. That 1/2 inch will not allow the pocket door to return into the wall pocket. We need to use a pocket door in order to have sufficient room inside the restroom to provide 24 inches of wall space for the extension of the side grab bar beyond the front edge of the water closet. Raising the circle and triangle is providing redundant information to the raised letter and Braille signs on the wall.

If you have any questions, would you please call me at (707) 829 9440? I look forward to talking to you.

Thank you for your time and consideration.

Sincerely,  
Hollynn D'Lil

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**Attachments:** hdl resume 2008.doc

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## **SUMMARY**

- Certified as an expert in disability issues in Federal Court for the Northern District of California
- Recognized for expertise in California, Nevada and Federal laws and regulations governing architectural and programmatic accessibility for people with disabilities.

## **AFFILIATIONS**

- Member, National Fire Protection Association. Member, Disability Access Review and Advisory Committee, 2004 to present
- Member, California Secretary of State Voting Accessibility Advisory Committee, 2006
- Member, U.S. Access Board Advisory Committee on Public Rights of Way, 1999 - 2007
- Treasurer and member of Board of Designing Accessible Communities, 2007 to present
- Member, California Department of Housing and Community Development Task Force to Rewrite California Accessible Housing Standards, 2001 - present
- Liaison between the California Access Coalition (CAC) and leadership of the California Building Officials Organization (CalBO) to develop California's first Accessibility Standards for Public Accommodations, promulgated by the Division of the State Architect into California Building Code Title 24.
- Member, Division of the State Architect Design Safety and Accessibility Advisory Board regarding proposed code changes to California Building Code Title 24 Accessibility Standards for Public Accommodations. 2000 to 2003. Authored 8 code changes to 2002 California Title 24.
- Past Chair, California State Historic Building Safety Board Accessibility Committee. Wrote the 1998 revision of the Accessibility Chapter of California State Historical Building Code. Assisted in development of Code's accessibility standards in 1980.
- Past member, California Department of Housing and Community Development Disability Advisory Committee. Facilitated writing of 1992, 1988 and 1985 revisions to the California Building Code Title 24 adaptable housing standards.
- Vital role in adoption of regulations for "areas of evacuation assistance" promulgated in the California Building Code.
- Member, Advisory Committee on special access lifts of the Elevator Ride and Tramway Unit, Division of Occupational Safety and Health, Department of Industrial Relations. Developed access lift standards.
- Member, the Coalition of Disability Access Professionals.
- Past Member, California Department of Health Services Task Force for Playground Safety Regulations
- Founder, California Access Coalition
- Founder, Community Access Network, California Department of Rehabilitation
- Founding Member, California Governor's Access Task Force, 2002 to 2003

## **SEMINAR AND CONSULTING EXPERIENCE**

California Office of the Secretary of State  
County of Marin  
California Association of Clerks and Election Officials  
County of Santa Cruz Elections  
California Board of Prison Terms  
California Department of Rehabilitation  
American Construction Inspectors Association

California Building Officials Annual Business Meeting  
 State Chapters of the International Conference of Building Officials  
 California Chapters of the American Institute of Architects  
 Disability Rights Education, Enforcement Services  
 County and City of San Diego  
 Southern California Joint Powers Insurance Authority  
 Siskiyou County Administration  
 City of Inglewood  
 Builders Exchange, Stockton, CA  
 Secretary of State  
 Real Estate Design Services, California Department of General Services  
 Department of Buildings and Grounds, California Department of General Services  
 California Association for School Housing  
 California Association for Parks and Recreation  
 California Association of School Business Professionals  
 University of California, Davis: Computer Technology for Employees with Disabilities  
 Disabled in State Service  
 Kern County Administration  
 City of San Luis Obispo  
 Riverside County Administration  
 California Department of Fish and Game  
 California Department of General Services  
 California Department of Air Resources  
 California Franchise Tax Board  
 California Department of Education  
 California Department of Social Services  
 California Department of Parks and Recreation  
 California Department of Rehabilitation, Community Resources Division, 20 statewide  
 California Department of Corrections  
 California Board of Prison Terms

**U. S. Department of Housing and Urban Development, 1994 - 1995 and 1990 - 1991.** Developed and presented seventeen seminars on the 1988 Fair Housing Amendments Act Accessibility Guidelines.

#### **American Association of Architects**

Conducted accessibility training for California and Hawaii chapters 1982 and 1996

## **PUBLICATIONS**

### **Articles**

Ms Magazine, Mainstream Magazine, Los Angeles Times, The San Francisco Examiner-California Living Magazine, Sacramento Magazine, The Santa Rosa Press Democrat, The Orange County Architect, The New World, The West County Gazette, Desert Dispatch Newspapers, The North Coast Times, Ragged Edge

### **Books**

Access Guide: Survey Checklist, 1994, 1995, 1999 of the California Division of the State Architect and the California Department of Rehabilitation; The National Center for a Barrier Free Environment Access Information Bulletin on "Curb Ramps, Parking, Passenger Loading Zones and Bus Stops," chapter in The Whole World's Watching, by the Berkeley Art Center. Editorial Subcommittee member for the Final Report: Building a True Community, Recommendations of the Public Rights-of-Way Access Advisory Committee to the U.S. Access Board.

## **AWARDS**

Advocate of the Year, 1992. California Coalition of Independent Living Centers  
 Certificate of Appreciation for Exceptional Service to the Office of the State Fire Marshal and the Citizens of California 1989 and 1990  
 Extraordinary Meritorious Services Award.  
 Sacramento Area Mayor's Committee on Disability Issues, 1988.  
 Outstanding Woman Entrepreneur, 1986.

California Governor's Conference on Women in Business.  
Best and Brightest, 1985. Sacramento Magazine.  
Award for Outstanding Contribution to the Image of Sacramento Women, 1985.  
Sacramento YWCA.  
First Place for Architectural Planning and Design of a Customized Single Family Residence, 1981.  
California Governor's Committee for Employment of People with Disabilities.