



## DISABILITY AND COMMUNICATION ACCESS BOARD

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### INTERPRETIVE OPINION

Pursuant to §103-50, Hawaii Revised Statutes (HRS), all public buildings, facilities and sites constructed by, or on behalf of the State or any county, shall conform to the 2004 Americans with Disabilities Act Accessibility Guidelines (2004 ADAAG) and amendments. In accordance to HRS §103-50 and Chapter 11-216, Hawaii Administrative Rules, the Disability and Communication Access Board has authority to issue interpretive opinions to HRS §103-50 design standards.

**Docket: DCAB 2020-02 Can an elevator (accessible vertical route) be shared between multi-story buildings? Or does each multi-story building need to have its own elevator? If a shared elevator is permitted: 1) can the elevator be located in one building, or can it be a standalone? 2) is there a maximum travel distance to the shared elevator?**

**Summary:** Generally, in multi-story buildings, stairways (non-accessible) are used to connect each story/floor thus triggering ADAAG 206.2.3 that requires “at least one accessible route to connect each story and mezzanine in multi-story buildings”. Per ADAAG 402, ramps, elevators and platform lifts are permitted components for “vertical” accessible routes.

Passenger elevators have no restrictions as to where they may be used, however every elevator provided is required to be accessible (ADAAG 206.6). Ramp slopes typically cannot exceed 1:12 (ADAAG 405.2) and require landings for every 30 inches of rise (ADAAG 405.6). Platform lifts may be used “freely” in alterations, but use is restricted in new construction (ADAAG 206.7) unless “existing site constraints make use of a ramp or elevator infeasible” (ADAAG 206.7.5).

The ADAAG does not contain verbiage;

That prohibits the sharing of elevator(s) between multi-story buildings, or that limits the elevator location to be within the extent of the building it serves.

That specifies the maximum travel distance to the vertical accessible route (e.g., elevator) from the general vertical circulation route (e.g., stairs).

However, ADAAG 206.3 requires “Accessible routes shall coincide in the same area as general circulation paths. Where circulation paths are interior, required accessible routes shall also be interior”.

If a ramp were to connect stories/floors at the maximum permitted ramp slope, for every inch of rise, a ramp run would be 12-inches, and landings would be required for every 30-inches of rise. The total combined travel distance of ramp runs, landings and the user effort required to use the ramps make ramps undesirable to connect floors. However, the total combined travel length of ramps runs and landings should be used to determine the maximum distance to an elevator from a stair, since the same distance would be traveled if a ramp was used.

*Ruling:* For buildings or facilities subject to HRS §103-50,

**ADAAG Section 206.2.3 Multi-Story Building and Facilities**

Elevators may be shared between multi-story facilities provided that all of the following are met:

1. For each story, the “environmental” route characteristics of the accessible route leading to the shared elevator coincides with the “environmental” route characteristics of the general circulation route that leads to the stair(s) that connects stories. For example:
  - a. If the general circulation route to the stairwell (that connects stories) is fully enclosed, then the accessible route to the shared elevator must be fully enclosed.
  - b. If the general circulation route to the stairwell (that connects stories) is covered but open air (e.g., overhead covering without walls), then the accessible route to the shared elevator at a minimum must be covered and open air.
2. For each story, the length of the accessible route to the elevator door from the nearest stair in each facility that connects stories does not exceed the total combined travel length of ramp runs and landings (including change in direction landings) that would be needed if a ramp were used to connect the shortest story within each facility.

[Rul: 01/07/2021] (Auth and Imp: HRS §103-50)

If you have any questions or comments regarding this ruling, please call us at 586-8121.

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