

**Attachment C**

**Federal Accessibility Violations at City and CRA/LA Properties**

The following are examples of violations of the federal accessibility laws found at some of the properties designed, constructed, or altered under the City of Los Angeles' (City) and the CRA/LA's (CRA/LA) housing programs. This list is illustrative, and not intended to provide a complete catalogue of the City's or the CRA/LA's violations. The United States found the same or similar additional violations throughout a larger survey of the City's and the CRA/LA's properties; as such, the United States projects the violations below to occur at all or a substantial majority of the properties the City or the CRA/LA funded with federal dollars.

The properties referenced in the lists below are:

1. 36th & Broadway, IDIS 10352 ("36th & Broadway");
2. Afton Place, IDIS 9068 ("Afton Place");
3. Amistad Plaza Apartments, IDIS 6477 ("Amistad");
4. Apple Tree Village, IDIS 8207 ("Apple Tree Village");
5. Asbury Apartments, IDIS 7484 ("Asbury");
6. Avalon Place, IDIS 5590 ("Avalon Place");
7. Benton Green Apartments, IDIS 2869 ("Benton Green");
8. Blythe Street Apartments, IDIS 896 ("Blythe Street");
9. Buckingham Place Senior Housing IDIS 8323 ("Buckingham Place");
8. EHOP, Inc., IDIS 8543 ("EHOP");
9. Encore Hall (aka Triangle Square Senior Apartments), IDIS 9807 ("Encore Hall");
10. Figueroa Apartments, IDIS 12845 ("Figueroa");
11. The Gallery @ NoHo Commons IDIS 8577 ("The Gallery");
12. Hudson (aka Historic Hollywood Hillview), IDIS 8279 ("Hudson");
13. Imani Fe Apartments (East and West), IDIS 10918, 6621, and 10026

- 1 (“Imani Fe”);
- 2 14. Lofts at NoHo Commons, IDIS 7378, plus Section 108 and EDI (“The
- 3 Lofts”);
- 4 15. Lyndon Hotel, IDIS 9776 (“Lyndon Hotel”);
- 5 16. Metro Hollywood Apartments (aka Western Hollywood Phase II), IDIS
- 6 5816 (“Metro Hollywood”);
- 7 17. Miramar Village, IDIS 9028 (“Miramar”);
- 8 18. Park Place Apartments, IDIS 3827 (“Park Place”);
- 9 19. Penny Lane Permanent (aka Columbus Permanent) (“Penny Lane”), IDIS
- 10 9697 and 7570;
- 11 20. Rio Vista Apartments, IDIS 13246 (“Rio Vista”);
- 12 21. Rittenhouse Square, IDIS 10315 (“Rittenhouse”);
- 13 22. Saticoy Apartments, IDIS 8445 (“Saticoy”);
- 14 23. Second Avenue, IDIS 10043 (“Second Ave.”);
- 15 24. The Serrano, IDIS 12914 (“Serrano”);
- 16 25. Sheraton Town House, IDIS 8951 (“Sheraton”);
- 17 26. St. Anne’s Transitional Housing, IDIS 8991 (“St. Anne’s”);
- 18 27. Terre One Apartments, IDIS 6731 (“Terre One”);
- 19 28. 4070 Ursula Apartments, IDIS 8404 (“Ursula”);
- 20 29. Vermont Senior Housing, IDIS 9043, 7559, 10537 (“Vermont Senior”)
- 21 30. Villa Paloma Transitional, IDIS 2701 (“Villa Paloma”);
- 22 31. Vista Monterey Apartments, IDIS 8093 (“Vista Monterey”);
- 23 32. The Whittier Apartments, IDIS 12921 (“Whittier”);
- 24 33. Winnetka Senior Apts., IDIS 13863 (“Winnetka”);
- 25 34. Witmer Heights, IDIS 9664 (“Witmer”); and
- 26 35. Yale Terrace Apartments, IDIS 6128 (“Yale Terrace”).
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2 **I. Violations of Federal Accessibility Laws at Properties the City Funded with**  
3 **HUD Funds.**

4 The following include violations of the federal accessibility laws in specific  
5 dwelling units of buildings that the City funded with federal financial assistance:

6 **A. Inaccessible doors without sufficient maneuvering space**

- 7 1. Doors with a pull-side forward approach without maneuvering space  
8 60 inches deep extending 18 inches to the side of the latch. *See, e.g.*,  
9 Afton Place 103, 106; Benton Green 106; EHOP; Hudson 112; Penny  
10 Lane 103; Sheraton 403, 209, 904, 1106, 1402, 1412; St. Anne's 201,  
11 214. UFAS §§ 4.1.2(7), 4.1.6, 4.13.6, 4.34.1, 4.34.2(6);
- 12 2. Doors with a pull-side latch side approach without a closer and  
13 without maneuvering space 48 inches deep, extending 24 inches to  
14 the latch side of the door. *See, e.g.*, Afton Place 107; Apple Tree  
15 Village 110, 112, 119, 121 126, 128 ; Avalon Place 102, 211, 413;  
16 Rittenhouse 318, 518; Witmer 503; Yale Terrace 202, 303. UFAS §§  
17 4.1.2(7), 4.1.6, 4.13.6, 4.34.1, 4.34.2(6);
- 18 3. Doors with a push-side forward approach without maneuvering space  
19 48 inches deep. *See, e.g.*, Apple Tree Village 110, 112, 119, 121 126,  
20 128; Serrano 603; Sheraton 904; Whitter 203). UFAS §§ 4.1.2(7),  
21 4.1.6, 4.13.6, 4.34.2(6); and
- 22 4. Doors with a push side approach with a latch and closer that do not  
23 extend 12 inches to the latch side of the door. *See, e.g.*, Saticoy 100;  
24 Winnetka 204. UFAS §§ 4.1.2(7), 4.1.6, 4.13.6, 4.34.2(6); Fair  
25 Housing Accessibility Guidelines Req. 2 (ANSI A117.1-1986 §  
26 4.13.6); 2010 ADA Standards §§ 206.5, 404.2.4.

27 **B. Inaccessible doors that are not wide enough**



- 1           11. Balcony door thresholds taller than three-quarters of an inch on either  
2 side, or taller than one-quarter inch and not beveled. *See, e.g.*, Apple  
3 Tree Village 110, 112, 119, 121 126, 128, 307, 402, 417, 229;  
4 Avalon Place 102, 205, 320, 413; Miramar Village 420, 438, 202,  
5 402, 206, 319, 333, 337; Rio Vista 409, 413, 414, 401;  
6 Rittenhouse 503, 303, 518, 212; Serrano 204, 309, 603 , 208, 403,  
7 301, 509, 306, 404; Whitter 203, 204, 208, 209; Witmer 503, 409;  
8 Yale Terrace 202, 303, 407). UFAS §§ 4.1.2(7) and (8), 4.1.6,  
9 4.13.8, 4.34.2(6); Fair Housing Accessibility Guidelines Req. 4,  
10 Guideline 4; 2010 ADA Standards §§ 206.5, 404.2.5; and  
11           12. Bathroom shower thresholds taller than one-half inch or taller than  
12 one-quarter inch and not beveled. *See, e.g.*, Afton Place 103, 106,  
13 107. UFAS §§ 4.1.2, 4.1.6, 4.13.8, 4.34.2(3).

14           **D. Controls that cannot be operated without tight grasping, tight pinching,**  
15           **or twisting of the wrist**

- 16           13. Unit door hardware not operable without tight grasping, tight  
17 pinching, or twisting of the wrist. *See, e.g.*, Asbury; Avalon Place  
18 102; Blythe 103, 104; EHOP; Figueroa 103; Hudson 211, 307; Park  
19 Place 104, 116, 301, 308, 316, 327, 331, 327; Ursula 1, 10, 11.  
20 UFAS §§ 4.1.2(7) and (8), 4.1.6, 4.13.9, 4.34.2(6); 2010 ADA  
21 Standards §§ 206.5, 233, 309.4, 404.2.7;  
22           14. Kitchen cabinet hardware not operable without tight grasping, tight  
23 pinching, or twisting of the wrist. *See, e.g.*, Afton Place 103, 106,  
24 107; Blythe 103, 104; EHOP; Penny Lane 103; Sheraton 102, 209,  
25 403, 1106, 1402, 1412; Yale Terrace 202, 303. UFAS §§ 4.1.2, 4.1.6,  
26 4.25, 4.27.4, 4.34.2(13), 4.34.6.10; and  
27           15. Bathroom sink, bathtub, or shower controls not operable without tight  
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1 grasping, tight pinching, or twisting of the wrist. *See, e.g.*, Afton  
2 Place 103, 106, 107; Sheraton 209, 102; St. Anne's 201, 214. UFAS  
3 §§ 4.27.4, 4.34.2(12), 4.34.5.4.

4 **E. Slopes that are too steep**

- 5 16. Maneuvering space at unit doors with more than a two percent slope.  
6 *See, e.g.*, Miramar 402, 206, 319, 333, 337; Penny Lane 103. UFAS  
7 §§ 4.3.7, 4.13.6, 4.34.2(6); Fair Housing Accessibility Guidelines  
8 Req. 2 (ANSI A117.1-1986 §§ 4.3.7, 4.13.6);
- 9 17. Maneuvering space at balcony doors with more than a two percent  
10 slope. *See, e.g.*, Miramar 402; Serrano 204, 309, 603; Witmer 503.  
11 UFAS §§ 4.3.7, 4.13.6, 4.34.2(6); 2010 ADA Standards §§ 206.5,  
12 404.2.4.4; and
- 13 18. Roll-in shower floors with more than a two percent cross-slope. *See,*  
14 *e.g.*, Afton Place 103, 106, 107. UFAS §§ 4.3.7, 4.34.2(3),  
15 4.34.2(12), 4.34.5.5.

16 **F. Inaccessible kitchens**

- 17 19. Accessible features not added when kitchen was altered or  
18 reconfigured. *See, e.g.*, 36 St. & Broadway 161; Hudson 112, 211,  
19 307; Park Place 104, 116, 301, 308, 316, 327, 331, 327; Rittenhouse  
20 318; Terre One 9; Witmer 401, 410, 503; Yale Terrace 202, 303.  
21 UFAS §§ 4.1.6, 4.34.2(13), 4.34.6;
- 22 20. Kitchens without at least one wall cabinet or shelf above the work  
23 surface that is no more than 48 inches from the floor. *See, e.g.*, Afton  
24 Place 103, 106, 107; Apple Tree Village 110, 112, 119, 121 126, 128;  
25 Avalon Place 205, 413; Benton Green 100, 106; Blythe 103, 104;  
26 EHOP; Figueroa 103; Lyndon Hotel 111; Miramar 202, 211, 402,  
27 411, 420, 438; Penny Lane 103; Rittenhouse 303, 318, 503, 518;

1 Saticoy 100, 101; Sheraton 904, 1106, 1402, 1412, 403, 209, 102; St.  
2 Anne's 201, 214; Yale Terrace 202, 303). UFAS §§ 4.34.3(13),  
3 4.36.6.10;

4 21. Kitchens without a 30-inch wide accessible work surface no higher  
5 than 24 inches with knee and toe space underneath. *See, e.g.*, Afton  
6 Place 102, 103, 106, 107, 320, 413; Apple Tree Village 110, 112,  
7 119, 121 126, 128; Benton Green 100, 106; Blythe 103, 104; EHOP;  
8 Lyndon Hotel 111; Miramar Village 202, 211, 402, 411, 420, 438;  
9 Penny Lane 103; Rio Vista 204; Rittenhouse 303, 318, 503, 518;  
10 Saticoy 100, 101; Serrano 204, 309, 603; Sheraton 904, 1106, 1402,  
11 1412, 403, 209, 102; St. Anne's 201, 214; Yale Terrace 202, 303.  
12 UFAS §§ 4.34.3(13), 4.36.6.4; Fair Housing Accessibility Guidelines  
13 Req. 7 (ANSI A117.1-1986 § 4.32.5.4);

14 22. Hood light and fan switches more than 48 inches above the floor not  
15 repeated within reach on separate switches. *See, e.g.*, Afton Place  
16 103, 106, 107; Apple Tree Village 110, 112, 119, 121, 126; Avalon  
17 Place 102, 205, 320, 413; Benton Green 100, 106; Blythe 103, 104;  
18 EHOP; Lyndon Hotel 111; Miramar 202, 211, 402, 411, 420, 438;  
19 Penny Lane 103; Rio Vista 204; Rittenhouse 303, 318, 503, 518;  
20 Saticoy 100, 101; Serrano 204, 309, 603; Sheraton 102, 209, 403,  
21 904, 1106, 1402; St. Anne's 201, 214; Ursula 1, 10, 11; Whitter 203,  
22 204, 208; Winnetka 133, 204, 226, 234, 313, 330; Witmer 401, 410,  
23 503; Yale Terrace 202, 303. UFAS §§ 4.2.6, 4.34.2(9); 2010 ADA  
24 Standards §§ 205, 233, 308, 309.3;

25 23. Sharp and abrasive surfaces on the pipes or garbage disposal under  
26 the sink not insulated to protect against injury. *See, e.g.*, Afton Place  
27 103, 106, 107; Apple Tree Village 110, 112, 119, 121, 126; Avalon  
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1 Place 102, 205, 320, 413; Blythe 103, 104; Figueroa 103; Lyndon  
2 Hotel 111; Miramar 202, 211, 402, 411, 420, 438, 206, 319, 333, 337;  
3 Penny Lane 103; Rio Vista 204; Rittenhouse 303, 318, 503, 518;  
4 Sheraton 904, 1106, 1402, 1412, 403, 209, 102; St. Anne's 201, 214,  
5 318, Whitter 208, 203; Winnetka 133, 204, 226, 234, 313, 330;  
6 Witmer 401, 410, 503; Yale Terrace 202, 303. UFAS §§ 4.19.4,  
7 4.22.6, 4.34.2(12), 3.34.6.5(8); Fair Housing Accessibility Guidelines  
8 Req. 7 (ANSI A117.1-1986 § 4.19.4, 4.32.5.4(8)); 2010 ADA  
9 Standards §§ 606.5;

10 24. Garbage disposals interfere with forward clear knee and toe space  
11 under the sink. *See, e.g.*, Afton Place 103, 106, 107; Apple Tree  
12 Village 110, 112, 119, 121 126, 128; Avalon Place 102, 205, 320,  
13 413; EHOP; Miramar Village 202, 211, 402, 411, 420, 438; Rio Vista  
14 204, 304; Sheraton 904, 1106, 1402, 1412, 403, 209, 102; Ursula 1,  
15 10, 11; Whitter 208, 203; Yale Terrace 202, 303. UFAS §§  
16 4.34.2(13), 4.34.5.3(1); 2010 ADA Standards §§ 212, 233, 305, 306,  
17 606;

18 25. Freezer midpoints more than 54 inches above the floor. *See, e.g.*,  
19 Afton Place 103, 106, 107; Apple Tree Village 110, 112, 119, 121,  
20 126; Avalon Place 102, 205, 320, 413; Figueroa 103; Miramar  
21 Village 202, 211, 402, 411, 420, 438; Penny Lane 103; Serrano 204,  
22 309, 603; Sheraton 904, 1106, 1402, 1412, 403, 209, 102; Ursula 1,  
23 10, 11; Whitter 203, 204, 208; Winnetka 133, 204, 226, 234, 313,  
24 330; Yale Terrace 202, 303. UFAS §§ 4.34.2(13), 4.34.6.8(2)(a);  
25 2010 ADA Standards §§ 806.2.5, 804.6.6, 809.3;

26 26. Ovens not adjacent to accessible work surfaces, and/or not self-  
27 cleaning. *See, e.g.*, Afton Place 103, 106, 107; Apple Tree Village  
28

1 110, 112, 119, 121, 126; Asbury; Avalon Place 102, 205, 320, 413;  
2 Benton Green 100, 106; Blythe 103, 104; EHOP; Miramar Village  
3 202, 211, 402, 411, 420, 438; Penny Lane 103; Rittenhouse 303, 518;  
4 Saticoy 100, 101; Serrano 204, 309, 603 ; Sheraton 904, 1106, 1402,  
5 403, 209; St. Anne's 201, 214; Ursula 1, 10, 11; Yale Terrace 202,  
6 303. UFAS §§ 4.34.2(13), 4.34.6.7; 2010 ADA Standards §§ 212,  
7 233, 212, 804.3, 804.6.5.2;

8 27. The top of kitchen sinks not within 34 inches of the floor and without  
9 a forward clear floor space under the sink with knee and toe space.

10 *See, e.g.*, Afton Place 103, 106, 107; Avalon Place 102, 205, 320,  
11 413; Benton Green 100, 106; EHOP; Lyndon Hotel 111; Penny Lane  
12 103; Sheraton 1106, 1402, 1412, 403, 209, 102; St. Anne's 201;  
13 Ursula 1, 10, 11. UFAS §§ 4.34.2(13), 4.34.6.5;

14 28. Kitchen sinks more than six and one-half inches deep. *See, e.g.*,  
15 Afton Place 103, 106, 107; EHOP; Lyndon Hotel 111; Miramar 202,  
16 211, 402, 411, 420, 438; Penny Lane 103; Rio Vista 204; Rittenhouse  
17 303, 318, 503, 518; Sheraton 102, 209, 403, 904, 1106, 1402, 1412;  
18 Ursula 1, 10, 11. UFAS §§ 4.34.2(13), 4.34.6.5;

19 29. Ranges without a parallel clear floor space centered on the range that  
20 is 30 inches by 48 inches. *See, e.g.*, Apple Tree Village 229; Benton  
21 Green 104, 112, 113, 111. Fair Housing Accessibility Guidelines  
22 Req. 7 Guideline 1(a) (ANSI A117.1-1986 § 4.32.5.2);

23 30. U-shaped kitchens without a sixty-inch diameter clear floor-turning  
24 space. *See, e.g.*, Apple Tree Village 112, 110, 126, 128, 307, 402;  
25 Benton Green 104, 112, 113, 111, 202; Serrano 204, 309; Sheraton  
26 1402, 1106; Whitter 203. UFAS §§ 4.34.2(13), 4.34.6.1; Fair  
27 Housing Accessibility Guidelines Req. 7 Guideline 1(c) (ANSI  
28

1 A117.1-1986 § 4.32.5);

- 2 31. Clearance between opposing counters cabinets, appliances, or walls is  
3 less than forty inches. *See, e.g.*, Sheraton 403, 904, and 1412. UFAS  
4 §§ 4.34.2(13), 4.34.6.1;
- 5 32. Garbage disposal switches not in an accessible location. *See, e.g.*, St.  
6 Anne's 201, 214. UFAS §§ 4.2.6, 4.27, 4.34.2(9); and
- 7 33. Range controls on the back panel. *See, e.g.*, Blythe 103, 104;  
8 Sheraton 102. UFAS §§ 4.34.2(13), 4.34.6.7.

9 **G. Inaccessible bathrooms**

- 10 34. Updated features of the bathroom, including doors, tubs, toilets,  
11 lavatories, vanities and other fixtures, do not have any accessibility  
12 features at all. *See, e.g.*, 36 St. & Broadway 161; EHOP; Hudson  
13 112, 211, 307; Park Place 104, 116, 301, 308, 316, 327, 331, 327;  
14 Penny Lane 103; Sheraton 904, 1412, 1106, 403; Terre One 9; Ursula  
15 1, 10, 11. UFAS §§ 4.1.6, 4.34.2(12), 4.34.5;
- 16 35. Clear floor space for toilets that is not 60 inches wide and 56 inches  
17 deep, or that is not 48 inches wide and 66 inches deep. *See, e.g.*,  
18 Apple Tree Village 119, 121, 229; Asbury; Rittenhouse 303, 318,  
19 503, 518, 214; Serrano 204, 309, 603; Sheraton 1402; Whitter 204,  
20 203; Winnetka 204; Witmer 401, 410, 503. UFAS §§ 4.34.2(12),  
21 4.34.5.2; Fair Housing Accessibility Guidelines Req. Req. 7(2)(a)(ii)  
22 (ANSI A117.1-1986 § 4.32.4.2); 2010 ADA Standards §§ 233,  
23 604.3.2;
- 24 36. Clear floor space at the toilet where a side approach is possible that is  
25 not at least 56 inches wide and 48 inches deep. *See, e.g.*, Apple Tree  
26 Village 112, 110, 126, 128; Avalon Place 205, 413; Lyndon Hotel  
27 111; Miramar 202, 211, 402, 411, 420, 438; Sheraton 209, 102; Yale  
28

- 1 Terrace 202, 303. UFAS §§ 4.34.2(12), 4.34.5.2;
- 2 37. Clearance in front of the tub that is not at least 30 inches wide
- 3 because it is blocked by a vanity, the toilet, or another object. *See,*
- 4 *e.g.,* Apple Tree Village 110, 112, 119, 121 126, 128 , 307, 402;
- 5 Avalon Place 102, 205, 320, 413; Benton Green 106; Rittenhouse
- 6 303, 318, 503, 518. UFAS §§ 3.34.2(12), 4.34.5.4; Fair Housing
- 7 Accessibility Guidelines Req. 7(2)(b)(vi) (ANSI A117.1-1986 §
- 8 4.20.2);
- 9 38. Sixty-inch parallel clear floor spaces in front of roll-in showers are
- 10 partially blocked by a toilet or vanity. *See, e.g.,* Afton Place 103,
- 11 106, 107; Miramar Village 211, 411, 202, 402. UFAS §§ 4.34.2(12),
- 12 4.34.5.5(1);
- 13 39. Bathrooms without a 60-inch clear floor-turning circle or a compliant
- 14 T-shaped turning space. *See, e.g.,* Afton Place 103, 106, 107. UFAS
- 15 §§ 4.34.2(2), 4.2.3;
- 16 40. Doors that swing improperly into the clear floor space of a fixture in
- 17 the bathroom. *See, e.g.,* Miramar Village 211, 411, 420, 438, 202;
- 18 Sheraton 1402, 102. UFAS §§ 4.34.2(2), 4.34.5.1;
- 19 41. Lavatories without a forward approach with knee space 30 inches
- 20 wide, at least 27 inches high for least eight inches past the front
- 21 ledge, and toe space at least nine inches high extending at least 17
- 22 inches under the lavatory. *See, e.g.,* Apple Tree Village 110, 112,
- 23 119, 121 126, 128 , 402, 229; Asbury; Benton Green 100, 106, 104,
- 24 112, 113, 108, 111, 107, 202; Sheraton 209; Yale Terrace 202, 303.
- 25 UFAS §§ 4.34.2(12), 4.34.5.3; Fair Housing Accessibility Guidelines
- 26 Reqs. 7 Guidelines 2(a)(ii) and 2(b)(v) (ANSI A117.1-1986 §
- 27 4.19.2.1);
- 28

- 1           42. Lavatories without a parallel clear floor space 30 inches wide and 48  
2 inches deep centered on the lavatory. *See, e.g.*, Yale Terrace (FHO  
3 407, FHO 410). Fair Housing Accessibility Guidelines Req. 7  
4 Guidelines 2(a)(ii) and 2(b)(v);
- 5           43. Pipes under accessible lavatories not properly insulated to protect  
6 people from burns and sharp or abrasive edges. *See, e.g.*, Afton Place  
7 106, 107; Apple Tree Village 110, 112, 119, 121 126, 128 , 402, 229;  
8 Avalon Place 102, 205, 320, 413; Blythe 103, 104; Lyndon Hotel  
9 111, 404; Miramar 202, 211, 402, 411, 420, 438; Rittenhouse 303,  
10 318, 503, 518; Sheraton 1402, 102; Whitter 203. UFAS §§ 4.19.4,  
11 4.22.6, 4.34.2(12), 4.34.5.3; Fair Housing Accessibility Guidelines  
12 Req. Req. 7 (ANSI A117.1-1986 § 4.19.4);
- 13           44. Bathtubs without a securable seat. *See, e.g.*, Apple Tree Village 110,  
14 112, 119, 121 126, 128; Asbury; Avalon Place 102, 205, 320, 413;  
15 Benton Green 100, 106; Blythe 103, 104; Figueroa 103; Lyndon  
16 Hotel 111; Rittenhouse 303, 318, 503, 518; Saticoy 100, 101;  
17 Sheraton 1402; St. Anne’s 201, 214; Witmer 401, 410, 503; Yale  
18 Terrace 202, 303. UFAS §§ 4.34.2(12), 4.34.5.4(2); 2010 ADA  
19 Standards §§ 233, 607.3, 809.4;
- 20           45. Shower seats that do not extend the full length of the seat wall to  
21 within one and one-half inches of the back wall or to within three  
22 inches of the compartment entry. *See, e.g.*, Afton Place 103, 106,  
23 107; Rio Vista 304. UFAS §§ 4.34.2(12), 4.34.5.4(2);
- 24           46. Bathtub controls not mounted between the midpoint and the open end  
25 of the tub, and bathtubs without a handheld shower unit. *See, e.g.*,  
26 Apple Tree Village 119, 112, 121; Asbury; Avalon Place 102, 205,  
27 320, 413; Benton Green 100, 106; Blythe 103, 104; Lyndon Hotel  
28

1 (FHO) 404; Miramar 420, 438, 402, (FHO) 206; Rittenhouse 503,  
2 303; Saticoy 100, 101; St. Anne's 201, 214; Yale Terrace 202, 303.  
3 UFAS §§ 4.34.2(12), 4.34.5.4(4) and (5);

4 47. Toilet flush controls not on the open side of the toilet. *See, e.g.,*  
5 Apple Tree Village 119; Asbury; Avalon Place 102, 413; Benton  
6 Green 100, 106; Miramar Village 420; Rittenhouse 303, 318, 503,  
7 518; Saticoy 101; Sheraton 1402, 209; Witmer 401, 410, 503. UFAS  
8 §§ 4.16.5, 4.34.2(12), 4.34.5.2(1);

9 48. Toilets with a centerline more or less than 18 inches from the side  
10 wall. *See, e.g.,* Apple Tree Village 121; Asbury; Avalon Place 102,  
11 205, 413; Benton Green 112, 111; Blythe 103, 104; Miramar Village  
12 438, 202; Sheraton 1402, 209, 102; Witmer 410. UFAS §§  
13 4.34.2(12), 4.34.5.2(1); Fair Housing Accessibility Guidelines Req. 7  
14 Guidelines 2(a)(ii) and 2(b)(iv);

15 49. Toilet paper dispensers not on the nearest side wall, or more than 36  
16 inches from the back wall. *See, e.g.,* Apple Tree Village 119, 112;  
17 Avalon Place 102, 205, 413; Blythe 104; Miramar 202, 211, 402,  
18 411, 420, 438; Saticoy 100, 101; St. Anne's 201, 214; Winnetka 133;  
19 Yale Terrace 202, 303. UFAS §§ 4.34.2(12), 4.34.5.2(4); 2010 ADA  
20 Standards §§ 213.2, 604.7;

21 50. Mirrors with the bottom edge of the reflective surface more than 40  
22 inches from the floor. *See, e.g.,* Afton Place 103, 106, 107; Lyndon  
23 Hotel 111; Miramar 202, 211, 402, 411, 420, 438; Sheraton 1402,  
24 102; St. Anne's 201. UFAS §§ 4.19.6, 4.22.6, 4.34.2(12), 4.34.5.3(3);

25 51. Medicine cabinets, where provided, with a lowest shelf more than 44  
26 inches from the floor. *See, e.g.,* Afton Place 103, 106, 107; Avalon  
27 Place 102, 205, 320, 413; Benton Green 106; Saticoy 100, 101; Yale  
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- 1 Terrace 202, 303. UFAS §§ 4.19.3, 4.22.6, 4.34.2(12), 4.34.5.3(3);
- 2 52. Medicine cabinets without a clear floor space of 30 inches by 48
- 3 inches. *See, e.g.*, Apple Tree Village 112, 110, 126, 128; Fair
- 4 Housing Accessibility Guidelines Req. 4.22.6, 4.34.2(12),
- 5 4.34.5.3(3);
- 6 53. Towel bars more than 54 inches above the floor. *See, e.g.*, Afton
- 7 Place 103, 106, 107. UFAS §§ 4.25.3, 4.34.2(8);
- 8 54. Electrical receptacles above counters, where the counters are taller
- 9 than 34 inches, and the depth of the counter exceeds 24 inches. *See,*
- 10 *e.g.*, Lyndon Hotel 111. UFAS §§ 4.34.2(9), 4.2.6; Fair Housing
- 11 Accessibility Guidelines Req. 5; and
- 12 55. Hand-held shower units without an on/off control. *See, e.g.*, Figueroa
- 13 103. 2010 ADA Standards §§ 233, 809.4, 607.6.

14 **H. Inaccessible electrical outlets and receptacles**

- 15 56. Electrical outlets with centerlines that are not at least 15 inches above
- 16 the floor. *See, e.g.*, Benton Green 100, 106, 104, 112, 113, 108, 111,
- 17 107, 202; Sheraton 904, 1106, 1402, 1412, 403, 209, 102. UFAS §§
- 18 4.34.2(9), 4.27.3; Fair Housing Accessibility Guidelines Req. 5;
- 19 57. Electrical outlets above kitchen or bathroom cabinets with centerlines
- 20 that are more than 46 inches from the floor. *See, e.g.*, Afton Place
- 21 103, 106, 107; Serrano 208, 403, 301, 509, 306, 404; Witmer 202,
- 22 405, 409). UFAS §§ 4.2.6, 4.27.3, 4.34.2(9); Fair Housing
- 23 Accessibility Guidelines Req. 5; and
- 24 58. Electrical receptacles above counters where the counters are more
- 25 than 34 inches high and/or the receptacles are more than 24 inches
- 26 back from the front edge of the counter. *See, e.g.*, Afton Place 103,
- 27 106, 107; Apple Tree Village 110, 112, 119, 121, 126; Avalon Place
- 28

1 102, 205, 320, 413; EHOP; Miramar 202, 211, 402, 411, 420, 438;  
2 Penny Lane 103; Sheraton 102, 209, 403, 904, 1106, 1402; St. Anne's  
3 201; Yale Terrace 202, 303. UFAS §§ 4.2.6, 4.27.3, 4.34.2(9); Fair  
4 Housing Accessibility Guidelines Req. 5.

5 **I. Inaccessible balconies**

- 6 59. Balcony sliding doors without a 32 inch clear opening because they  
7 are restricted by doorstops. *See, e.g.*, Apple Tree Village 128, 110,  
8 126, 307, 417, 229; Rio Vista; Witmer 503, 409; Yale Terrace, 407,  
9 410. UFAS §§ 4.13.5, 4.34.2(3); Fair Housing Accessibility  
10 Guidelines Req. 3 Guideline 2, Req. 4; and  
11 60. Balconies without 60 inches of clear turning room or compliant T-  
12 turns. *See, e.g.*, Apple Tree Village 110, 112, 119, 121 126, 128;  
13 Miramar 211, 420, 438, 202; Rittenhouse 303, 318, 503, 518; Whitter  
14 203. UFAS §§ 4.2.3, 4.34.2(2); 2010 ADA Standards §§ 233, 304.3,  
15 809.2.2.

16 **J. Other accessibility violations**

- 17 61. Windows with locking mechanisms mounted too high. *See, e.g.*, 36  
18 St. & Broadway 161; Apple Tree Village 110, 112, 119, 121 126,  
19 128; Avalon Place 102, 205, 320, 413; Hudson 112, 211, 307;  
20 Miramar 202, 211, 402, 411, 420, 438; Rio Vista 204, 304;  
21 Rittenhouse 303, 318, 518; Saticoy 100, 101; Serrano 204, 309, 603;  
22 St. Anne's 201, 214; Whitter 208; Winnetka 133, 204, 226, 234, 313,  
23 330; Yale Terrace 202, 303. UFAS §§ 4.2.6, 4.27.3, 4.34.2(9);  
24 62. Circuit breaker panel tops more than 48 inches high where a forward  
25 reach is required. *See, e.g.*, 36 St. & Broadway 161; Avalon Place  
26 102, 205, 320, 413; Figueroa 103; Hudson 112, 211, 307; Rittenhouse  
27 303, 318, 503, 518; Serrano 204, 309, 603; Sheraton 904, 1106, 1402,  
28

1 1412, 403, 209, 102; Winnetka 133; Witmer 401, 410, 503; Yale  
2 Terrace 202, 303. UFAS §§ 4.2.5, 4.27.3, 4.34.2(9); 2010 ADA  
3 Standards §§ 205, 309.3.1; and

- 4 63. Entrances blocked by steps. *See, e.g.*, Penny Lane 103. UFAS §§  
5 4.1.2, 4.1.6, 4.3.8.

6 The following include violations of the federal accessibility laws in general,  
7 common use, or public areas of buildings that the City funded with federal financial  
8 assistance:

9 **K. Inaccessible routes**

- 10 64. Doors with pull-side forward approaches that do not have  
11 maneuvering space 60 inches deep or space extending 18 inches to  
12 the latch side of the doorway. *See, e.g.*, 36 St. & Broadway; Afton  
13 Place; Apple Tree Village; Avalon Place; Benton Green; Blythe;  
14 Lyndon Hotel; Miramar; Serrano; Winnetka; Yale Terrace. UFAS §§  
15 4.1.2(7) and (8); 4.1.6, 4.3.9, 4.13.6, Figure 25(a); Fair Housing  
16 Accessibility Guidelines 2, 3 (ANSI A117.1-1986 § 4.13.6); 2010  
17 ADA Standards §§ 206.5, 404.2.4.1; 1991 ADA Standards §§  
18 4.1.3(7) and (8), 4.13.6;
- 19 65. Doors with push-side forward approaches with latches and closers  
20 that do not have maneuvering space 48 inches deep or space  
21 extending 12 inches to the latch side of the doorways. *See, e.g.*,  
22 Apple Tree Village; Hudson; Miramar; Rittenhouse; Sheraton; St.  
23 Anne's, Winnetka; Witmer. UFAS §§ 4.1.2(7) and (8); 4.1.6, 4.3.9,  
24 4.13.6, Figure 25(a); Fair Housing Accessibility Guidelines 2, 3  
25 (ANSI A117.1-1986 § 4.13.6); 2010 ADA Standards §§ 206.5,  
26 404.2.4.1; 1991 ADA Standards §§ 4.1.3(7) and (8), 4.13.6;
- 27 66. Doors with pull-side latch side approaches with closers that do not  
28

1 have maneuvering space 54 inches deep or space extending 24 inches  
2 to the latch side of the doorways. *See, e.g.*, Saticoy. UFAS §§  
3 4.1.2(7) and (8); 4.1.6, 4.3.9, 4.13.6, Figure 25(c); Fair Housing  
4 Accessibility Guidelines Req. 2 (ANSI A117.1-1986 § 4.13.6); 2010  
5 ADA Standards §§ 206.5, 404.2.4.1; 1991 ADA Standards §§  
6 4.1.3(7) and (8), 4.13.6;

7 67. Doors with push-side latch side approaches with closers that do not  
8 have maneuvering space 48 inches deep or space extending 24 inches  
9 to the latch side of the doorways. *See, e.g.*, Rittenhouse; Serrano.  
10 UFAS §§ 4.1.2(7) and (8); 4.1.6, 4.3.9, 4.13.6, Figure 25(c); Fair  
11 Housing Accessibility Guidelines Req. 2 (ANSI A117.1-1986 §  
12 4.13.6); 2010 ADA Standards §§ 206.5, 404.2.4.1; 1991 ADA  
13 Standards §§ 4.1.3(7) and (8), 4.13.6;

14 68. Fire extinguishers, cabinets, drop boxes, counters, door closers,  
15 drinking fountains and other objects that protrude more than four  
16 inches into the circulation path where the bottom of the objects are  
17 more than 27 inches above the ground. *See, e.g.*, 36 St. & Broadway;  
18 Apple Tree Village; Avalon Place; Benton Green; Blythe; Figueroa;  
19 Hudson; Miramar; Park Place; Second Ave.; Sheraton; The Whitter;  
20 Winnetka Senior; Witmer. UFAS §§ 4.1.2(2), 4.1.6, 4.4.1; Fair  
21 Housing Accessibility Guidelines Req. 2 (ANSI A117.1-1986 §  
22 4.4.1); 2010 ADA Standards §§ 204.1, 307.2;

23 69. Door or gate hardware along accessible routes to common use  
24 restrooms, courtyards, laundry rooms, and trash rooms with hardware  
25 that cannot be operated without tight grasping, tight pinching, or  
26 twisting of the wrist. *See, e.g.*, Apple Tree Village; Asbury; Benton  
27 Green; Blythe; Second Ave.; Sheraton; Ursula; Villa Paloma; The  
28

Whitter. UFAS §§ 4.1.2(7) and (8), 4.1.6, 4.13.9; Fair Housing Guidelines Req. 2 (ANSI A117.1-1986 §§ 4.13.9, 4.25.4); 2010 ADA Standards §§ 204.1, 307.2;

70. Maneuvering space at doors, accessible routes, passenger loading zones, and ramp landings with a slope or cross slope that exceeds two percent. *See, e.g.*, 36 St. & Broadway; Avalon Place; Benton Green; Hudson; Miramar; Penny Lane; Rio Vista; Serrano; St. Anne's; Winnetka Senior; Witmer. UFAS §§ 4.1.2, 4.1.6, 4.3.7, 4.6.5, 4.8.4, 4.13.6; Fair Housing Accessibility Guidelines 2 (ANSI A117.1-1986 §§ 4.3.7, 4.8.4, 4.13.6); 2010 ADA Standards §§ 209.1, 302, 402.2, 403, 404, 405, 503.4; 1991 ADA Standards 4.1.2(1) and (2), 4.1.3(1), 4.3.7;

71. Ramps with a slope that exceeds 8.33 percent. *See, e.g.*, Apple Tree Village; Avalon Place; Benton Green; Blythe; Figueroa; Lyndon Hotel; Park Place; Penny Lane; St. Anne's; Villa Paloma; Witmer. UFAS §§ 4.1.2, 4.1.6, 4.8.1, 4.8.2; Fair Housing Accessibility Guidelines Reqs. 1, 2 (ANSI A117.1-1986 § 4.8.2); 2010 ADA Standards §§ 206.1, 405.2; 1991 ADA Guidelines 4.1.2(1) and (2), 4.1.3(1), 4.8.2;

72. Abrupt changes in level on accessible routes exceeding one-half inch without an elevator, lift, or ramp. *See, e.g.*, 36 St. & Broadway; Benton Green; Figueroa; Sheraton. UFAS §§ 4.1.1(1), 4.1.2, 4.1.6, 4.3.8; Fair Housing Accessibility Guidelines Reqs. 1, 2 (ANSI A117.1-1986 § 4.3.7, 4.3.8); 2010 ADA Standards §§ .206.1, 303.4;

73. Routes that are not constructed as a ramp with a slope that exceeds five percent. *See, e.g.*, Benton Green; Blythe; Penny Lane. UFAS §§ 4.1.1(1), 4.1.2, 4.1.6, 4.3.7, 4.8.1 ; Fair Housing Accessibility

- 1 Guidelines Reqs. 1, 2 (ANSI A117.1-1986 § 4.3.7);
- 2 74. Operable parts of property call boxes and rent drop boxes installed
- 3 too high because they are blocked by an obstruction more than 34
- 4 inches tall and they are not within 54 inches of the floor. *See, e.g.*,
- 5 Afton Place; Apple Tree Village; Asbury; Avalon Place; Hudson;
- 6 Lyndon Hotel; Second Ave. UFAS §§ 4.1.2(12), 4.1.6, 4.2.6, 4.25.3;
- 7 Fair Housing Accessibility Guidelines Req.2 (ANSI A117.1-1986 §
- 8 4.2.6, 4.25.3);
- 9 75. Clear floor space in platform lifts narrower than 36 inches. *See, e.g.*,
- 10 Afton Place; Figueroa; Sheraton. UFAS §§ 4.1.2, 4.1.6, 4.2.4.1,
- 11 4.11.2, 4.27.2; 2010 ADA Standards §§ 206.1, 410.3, 305.7.1;
- 12 76. Clear openings of office and common use bathroom or balcony doors
- 13 less than 32 inches wide. *See, e.g.*, Avalon Place; Sheraton. UFAS
- 14 §§ 4.1.2(7), 4.1.6, 4.13.5; Fair Housing Accessibility Guidelines Req,
- 15 3 (ANSI A117.1-1986 § 4.13.5);
- 16 77. Accessible routes that are blocked by curbs without a ramp. *See, e.g.*,
- 17 Winnetka. UFAS §§ 4.1.1(4), 4.3.8; Fair Housing Accessibility
- 18 Guidelines Reqs. 1 or 2 (ANSI A117.1-1986 § 4.3.8); 2010 ADA
- 19 Standards §§ 206.1, 303.4;
- 20 78. Drain cover grate openings several inches long in the direction of
- 21 travel. *See, e.g.*, Park Place; Saticoy. UFAS §§ 4.1.2(2), 4.1.6, 4.5.4;
- 22 Fair Housing Accessibility Guidelines Req. 1 (ANSI A117.1-1986 §
- 23 4.5.4);
- 24 79. Overhead objects along the circulation path that are less than 80
- 25 inches from the floor. *See, e.g.*, Benton Green; Saticoy; Ursula.
- 26 UFAS §§ 4.1.2(2), 4.1.6, 4.3.5, 4.4.2; Fair Housing Accessibility
- 27 Guidelines Req. 2 (ANSI A117.1-1986 § 4.4.2);
- 28



1 1986 § 4.4.1); 2010 ADA Standards §§ 216.2, 703.4; 1991 ADA  
2 Standards 4.1.3(16)(a), 4.30.6;

- 3 87. Property signs for common use spaces without tactile features or  
4 appropriate accessible fonts. *See, e.g.*, 36 St. & Broadway; Afton  
5 Place; Apple Tree Village; Avalon Place; EHOP; Hudson; Miramar;  
6 Penny Lane; Rittenhouse; Second Ave.; The Serrano; The Whitter.  
7 UFAS §§ 4.1.2(15), 4.1.6, 4.30; 2010 ADA Standards §§ 216.2,  
8 703.4; and
- 9 88. Signs for handicapped parking spots that are missing or not visible.  
10 *See, e.g.*, Avalon Place; Benton Green. UFAS §§ 4.1.1(5), 4.6.4; Fair  
11 Housing Accessibility Guidelines Reqs. 1, 2 (ANSI A117.1-1986 §  
12 4.6.2).

13 **M. Inaccessible handicapped parking**

- 14 89. Insufficient numbers of handicapped parking spots because there are  
15 not accessible spots for each required accessible unit. *See, e.g.*, 36 St.  
16 & Broadway; Apple Tree Village; EHOP; Hudson; Miramar;  
17 Rittenhouse; Second Ave.; The Serrano. UFAS § 4.1.1(5)(d)(i) and  
18 (ii); Fair Housing Accessibility Guidelines Req. 2; 2010 ADA  
19 Standards § 208.2.3;
- 20 90. Handicapped parking access aisles that slope more than 2 percent.  
21 *See, e.g.*, Blythe; EHOP; The Whitter. UFAS §§ 4.1.1(5), 4.6.3;
- 22 91. Handicapped parking spot access aisles that do not have a 60 inch  
23 wide unobstructed aisle running the length of the car, because the  
24 aisle is obstructed by a column. *See, e.g.*, Avalon Place; Witmer.  
25 UFAS §§ 4.1.1(5), 4.6.3; Fair Housing Accessibility Guidelines Req.  
26 2 (ANSI A117.1-1986 § 4.6.2); and
- 27 92. Handicapped parking spots not on the shortest accessible routes. *See,*  
28

1 e.g., Avalon Place. UFAS §§ 4.1.1(5), 4.6.2; Fair Housing  
2 Accessibility Guidelines Req. 2 (ANSI A117.1-1986 § 4.6.2).

3 **N. Inaccessible common use restrooms**

4 93. Public restrooms without any accessible features. *See, e.g.*, 36 St. &  
5 Broadway; Lyndon Hotel. UFAS §§ 4.1.2(10), 4.1.6, 4.22; Fair  
6 Housing Accessibility Guidelines Req. 2 (ANSI A117.1-1986 §  
7 4.22.1);

8 94. Toilet paper dispenser more than 36 inches from the rear wall, and  
9 centerlines not between seven and nine inches in front of the toilet.  
10 *See, e.g.*, Blythe; Miramar; Saticoy; St. Anne's; Villa Paloma;  
11 Winnetka. UFAS §§ 4.1.2(10), 4.1.6, 4.16.6, Figure 39(b); Fair  
12 Housing Accessibility Guidelines Req. 2 (ANSI A117.1-1986 §  
13 4.16.6); 2010 ADA Standards §§ 213.2, 213.3.2, 604.7;

14 95. Toilet flush controls not on the wide side of the toilet space. *See,*  
15 *e.g.*, Apple Tree Village; Avalon Place; Sheraton; St. Anne's. UFAS  
16 §§ 4.1.2(10), 4.1.6, 4.16.5; Fair Housing Accessibility Guidelines  
17 Req. 2 (ANSI A117.1-1986 § 4.16.5); 1991 ADA Standards §§  
18 4.1.3(11), 4.16.5;

19 96. Sharp and abrasive surfaces on pipes under the sink not insulated to  
20 protect against injury. *See, e.g.*, Avalon Place; Blythe; Sheraton.  
21 UFAS §§ 4.1.2(10), 4.1.6, 4.19.4; Fair Housing Accessibility  
22 Guidelines Req. 2 (ANSI A117.1-1986 § 4.19.4);

23 97. Sidewall toilet grab bars not at least 42 inches long, not within 12  
24 inches of the rear wall, or not extending at least 54 inches from the  
25 rear wall. *See, e.g.*, Avalon Place; Rittenhouse; St. Anne's; Villa  
26 Paloma; Witmer. UFAS §§ 4.1.2(10), 4.1.6, 4.16.4, Figure 29(b);  
27 Fair Housing Accessibility Guidelines Req. 2 (ANSI A117.1-1986 §  
28

- 1 4.16.4); 2010 ADA Standards §§ .213.2, 605.1. 604.8.1.5;
- 2 98. Rear toilet grab bars not at least 36 inches long, or not extending
- 3 from the centerline of the toilet at least 12 inches in each direction.
- 4 *See, e.g.*, Avalon Place; Benton Green; Miramar; Villa Paloma; The
- 5 Whitter. UFAS §§ 4.1.2(10), 4.1.6, 4.16.4, Figure 29(a); Fair
- 6 Housing Accessibility Guidelines Reqs. 2 (ANSI A117.1-1986 §§
- 7 4.16.4, 4.17.6); 2010 ADA Standards §§ 213.2, 604.5.2, 604.8.1.5;
- 8 1991 ADA Standards §§ 4.1.3(11), 4.16.4, 4.17.6, 4.26.2;
- 9 99. Restroom lavatories without clear floor space extending at least 17
- 10 inches under the lavatory. *See, e.g.*, Benton Green; Saticoy. UFAS
- 11 §§ 4.1.2(10), 4.1.6, 4.19.3, Figure 32; Fair Housing Accessibility
- 12 Guidelines Req. 2 (ANSI A117.1-1986 § 4.19.2);
- 13 100. Toilet centerlines more or less than 18 inches from the sidewall. *See,*
- 14 *e.g.*, Avalon Place; Blythe; Rittenhouse; Saticoy; St. Anne's. UFAS
- 15 §§ 2.1.2(10), 4.1.6, 4.16.2, Figure 28; Fair Housing Accessibility
- 16 Guidelines Req. 2 (ANSI A117.1-1986 § 4.16.2);
- 17 101. Coat hooks installed more than 54 inches above the floor. *See, e.g.*,
- 18 Avalon Place; Rittenhouse. UFAS §§ 4.1.2(10), 4.1.6, 4.2.6, 4.25.3;
- 19 Fair Housing Accessibility Guidelines Req. 2 (ANSI A117.1-1986 §
- 20 4.23.3);
- 21 102. Toilet grab bars without one and one-half inch clear space below the
- 22 grab bar. *See, e.g.*, Blythe; St. Anne's. UFAS §§ 4.1.2(10), 4.1.6,
- 23 4.16.4, 4.26.2, Figure 39(a); Fair Housing Accessibility Guidelines
- 24 Req. 2 (ANSI A117.1-1986 § 4.24.2);
- 25 103. Missing toilet grab bars. *See, e.g.*, Sheraton; St. Anne's. UFAS §§
- 26 4.1.2(10), 4.1.6, 4.16.4, 4.17.6; 1991 ADA Standards 4.1.3(11),
- 27 4.16.4; 4.22.4, 4.26;
- 28

- 1 104. Toilet seats less than 17 inches from the floor. *See, e.g.*, Benton  
2 Green; Sheraton. UFAS §§ 4.1.2(10), 4.1.6, 4.16.3; Fair Housing  
3 Accessibility Guidelines Req. 4 (ANSI A117.1-1986 § 4.16.3);  
4 105. Clear floor space at the toilet not 60 inches wide. *See, e.g.*, Figueroa;  
5 Second Ave.; The Serrano; Witmer. UFAS §§ 4.1.2(10), 4.16.2,  
6 Figure 28; Fair Housing Accessibility Guidelines Req. 2 (ANSI  
7 A117.1-1986 § 4.16.2); 2010 ADA Standards 213,2, 604.3.1;  
8 106. Soap dispensers that require a side reach over an obstruction more  
9 than 34 inches tall, and more than 10 inches back from the front edge  
10 of the obstruction, and more than 48 inches from the floor. *See, e.g.*,  
11 Miramar. UFAS §§ 4.1.2(12), 4.1.6, 4.2.6, 4.27.3; Fair Housing  
12 Accessibility Guidelines Req. 2 (ANSI A117.1-1986 §§ 4.2.6,  
13 4.25.3);  
14 107. Toilet doors that swing into required clear floor space inside the stall.  
15 *See, e.g.*, Miramar. UFAS §§ 4.1.2(10), 4.1.6, 4.17.3; Fair Housing  
16 Accessibility Guidelines Req, 2;  
17 108. Eyewash operable controls more than 48 inches above the floor. *See,*  
18 *e.g.*, The Serrano. UFAS §§ 4.1.2(12), 4.2.5, 4.27.3, Fair Housing  
19 Accessibility Guidelines Req. 2, (ANSI A117.1-1986 §§ 4.2.5,  
20 4.25.3); and  
21 109. Mirrors where the reflective surface is more than 40 inches from the  
22 floor. *See, e.g.*, Sheraton; St. Anne's; Villa Paloma. UFAS §§  
23 4.1.2(10), 4.1.6, 4.19, 64.22.6, 4.23.6; Fair Housing Accessibility  
24 Guidelines Req. 2 (ANSI A117.1-1986 § 4.19.6);

25 **O. Inaccessible laundry rooms**

- 26 110. Washers and dryers with control or coin slot operable parts not within  
27 reach, because they require a side reach over an obstruction more  
28

1 than 34 inches tall, and the controls or coins slots are more than 10  
2 inches back from the front edge of the obstruction and/or more than  
3 48 inches from the floor. *See, e.g.*, Apple Tree Village; Asbury;  
4 Avalon Place; Benton Green; Blythe; Figueroa; Lyndon Hotel;  
5 Miramar; Park Place; Rio Vista; Saticoy; Second Ave.; Sheraton;  
6 Terre One; Ursula; Villa Paloma; Winnetka Senior; Witmer. UFAS  
7 §§ 4.1.2(12), 4.1.6, 4.1.3, 4.2.6, 4.27.3, 4.34.7; Fair Housing  
8 Accessibility Guidelines Req. 2 (ANSI A117.1-1986 §§ 4.2.6,  
9 4.25.3); 2010 ADA Standards 205, 308.3.2, 309.3;

10 111. Common use work surfaces taller than 34 inches, or that do not have  
11 knee clearance of 27 inches. *See, e.g.*, Benton Green; Blythe;  
12 Miramar; Sheraton; Ursula; Villa Paloma. UFAS §§ 4.1.2(17), 4.1.6,  
13 4.32.4, Fair Housing Accessibility Guidelines Req. 2 (ANSI A117.1-  
14 1986 § 4.30.2);

15 112. When washers and dryers are provided, there are no front loading  
16 washer. *See, e.g.*, Apple Tree Village; Avalon Place; Benton Green;  
17 Lyndon Hotel; Saticoy; Second Ave.; Ursula; Villa Paloma. UFAS  
18 §§ 4.1.2, 4.1.6, 4.1.3, 4.34.7.2; Fair Housing Accessibility Guidelines  
19 Req. 2 (ANSI A117.1-1986 § 4.32.6.2);

20 113. Accessible routes in front of washers and dryers too narrow because  
21 they are not 36 inches wide. *See, e.g.*, 36 St. & Broadway. UFAS §§  
22 4.1.2(1), 4.1.6, 4.3.3;

23 114. Commercial dryers stacked on washers, making operable parts of the  
24 dryer out of reach because the controls are higher than 48 inches and  
25 only on a back panel. *See, e.g.*, Afton Place. UFAS §§ 4.1.3, 4.2.6,  
26 4.27.3, 4.34.7;

27 115. Light switch timers that cannot be operated without tight grasping,  
28

1 tight pinching, or twisting of the wrist. *See, e.g.*, Blythe. UFAS §§  
2 4.1.2(12), 4.1.6, 4.27.4;

3 116. Sink faucet operable parts that are more than 34 inches tall and more  
4 than 24 inches from the front edge. *See, e.g.*, Lyndon Hotel;  
5 Winnetka Senior. UFAS §§ 4.1.2(12), 4.1.6, 4.2.6, 4.27.3, 4.34.7;  
6 2010 ADA Standards 205, 309.3;

7 117. Sink faucet hardware that cannot be operated without tight grasping,  
8 tight pinching, or twisting of the wrist. *See, e.g.*, St. Anne's. UFAS  
9 §§ 4.1.2(12), 4.1.6, 4.27.4; Fair Housing Accessibility Guidelines  
10 Req. 2 (ANSI A117.1-1986 § 4.25.4);

11 118. Washers and dryers not on an accessible route. *See, e.g.*, Afton  
12 Place). UFAS §§ 4.1.2, 4.1.6, 4.34.7.1; and

13 119. Paper towel dispensers not accessibly located because they require a  
14 side reach over an obstruction more than 34 inches tall, and the  
15 dispensers are more than 10 inches back from the front edge of the  
16 obstruction and/or more than 48 inches from the floor. *See, e.g.*, Rio  
17 Vista). UFAS §§ 4.1.2(12), 4.1.6, 4.2.6, 4.27.3; Fair Housing  
18 Accessibility Guidelines Req. 2 (ANSI A117.1-1986 §§ 4.2.6,  
19 4.25.3).

20 **P. Inaccessible community or other multi-purpose rooms**

21 120. Sink faucet operable parts more than 34 inches tall and/or more than  
22 24 inches from the front edge. *See, e.g.*, Apple Tree Village; Lyndon  
23 Hotel; Miramar; Saticoy; Villa Paloma. UFAS §§ 4.1.2(12), 4.1.6,  
24 4.2.6, 4.27.3; Fair Housing Accessibility Guidelines Req. 2 (ANSI  
25 A117.1-1986 §§ 4.2.6, 4.25.3);

26 121. Paper towel dispensers not accessibly located because they require a  
27 side reach over an obstruction more than 34 inches tall, and the  
28

1 dispensers are more than 10 inches back from the front edge of the  
2 obstruction and/or more than 48 inches from the floor. *See, e.g.*,  
3 Avalon Place; Park Place; Rittenhouse; Yale Terrace. UFAS §§  
4 4.1.2(12), 4.1.6, 4.2.6, 4.27.3;

5 122. Community room thermostat controls too high because they require a  
6 side reach over an obstruction more than 34 inches tall, and the  
7 control is more than 10 inches back from the front edge of the  
8 obstruction and/or more than 48 inches from the floor and more than  
9 10 inches back from the front edge. *See, e.g.*, 36 St. & Broadway.  
10 UFAS §§ 4.1.2(12), 4.27.3;

11 123. Hood light and fan switches more than 48 inches above the floor and  
12 not repeated within reach on separate switches. *See, e.g.*, Rio Vista;  
13 Villa Paloma; The Whitter. UFAS §§ 4.1.(12), 4.2.5, 4.27.3; Fair  
14 Housing Accessibility Guidelines Req. 2 (ANSI A117.1-1986 §§  
15 4.2.5, 4.25.3); 2010 ADA Standards §§ 205, 308, 309.3;

16 124. Drop boxes mounted more than 48 inches from the floor. *See, e.g.*,  
17 Benton Green. UFAS §§ 4.1.2(12), 4.2.5, 4.27.3; Fair Housing  
18 Accessibility Guidelines Req. 2 (ANSI A117.1-1986 §§ 4.2.5,  
19 4.25.3);

20 125. Table seating without clearance 30 inches wide, 27 inches high and  
21 17 inches deep for 5 percent of the seats. *See, e.g.*, The Serrano;  
22 Winnetka. UFAS §§ 4.1.2, 4.1.6, 4.32.4, Figure 45; Fair Housing  
23 Accessibility Guidelines Req. 2 (ANSI A117.1-1986 § 4.30); 2010  
24 ADA Standards §§ 226.1, 226.2, 305, 306, 902.2;

25 126. Soap dispensers that require a side reach over an obstruction more  
26 than 34 inches tall, and dispensers more than 10 inches back from the  
27 front edge of the obstruction and/or more than 48 inches from the  
28

1 floor. *See, e.g.*, Rittenhouse. UFAS §§ 4.1.2(12), 4.1.6, 4.2.6,  
2 4.27.3;

3 127. Microwave operable controls too high because they require a side  
4 reach over an obstruction more than 34 inches tall, and the controls  
5 are more than 10 inches back from the front edge of the obstruction  
6 and/or more than 48 inches from the floor. *See, e.g.*, St. Anne's.  
7 UFAS §§ 4.1.2(12), 4.1.6, 4.2.6, 4.27.3; Fair Housing Accessibility  
8 Guidelines Req. 2 (ANSI A117.1-1986 §§ 4.2.6, 4.25.3);

9 128. Wall volume controls that cannot be operated without tight grasping,  
10 tight pinching, or twisting of the wrist. *See, e.g.*, The Whitter. UFAS  
11 §§ 4.1.2(12), 4.27.4; Fair Housing Accessibility Guidelines Req. 2  
12 (ANSI A117.1-1986 § 4.25.4); 2010 ADA Standards §§ 205, 309.4;

13 129. The midpoint of freezers are more than 54 inches from the floor. *See,*  
14 *e.g.*, The Serrano; Villa Paloma. UFAS §§ 4.34.2(13), 4.34.6.8; 2010  
15 ADA Standards §§ 233, 809.3, 804.6.6; and

16 130. Baby changing tables installed more than 34 inches above the floor.  
17 *See, e.g.*, Villa Paloma. UFAS §§ 4.1.2, 4.1.6, 4.32.4.

18 **Q. Inaccessible trash rooms**

19 131. Trash chute door that cannot be opened with five-pounds or less of  
20 force. *See, e.g.*, Afton Place; Apple Tree Village; Avalon Place;  
21 Miramar; Rio Vista; The Serrano; Sheraton; St. Anne's; The Whitter;  
22 Witmer. UFAS §§ 4.1.2(12), 4.1.6, 4.27.4; Fair Housing  
23 Accessibility Guidelines Req. 2 (ANSI A117.1-1986 § 4.25.4); 2010  
24 ADA Standards 205, 309.4;

25 132. Trash chute door that cannot be operated without tight grasping, tight  
26 pinching, or twisting of the wrist. *See, e.g.*, Afton Place; Miramar  
27 Village; Sheraton. UFAS §§ 4.1.2(12), 4.1.6, 4.27.4; and

1 133. Sink faucet operable parts more than 34 inches tall and/or more than  
2 24 inches from the front edge. *See, e.g.*, Rio Vista. UFAS §§  
3 4.1.2(12), 4.1.6, 4.2.6, 4.27.3.

4 **R. Inaccessible mail facilities**

5 134. Mailboxes, or a portion of mailboxes, above 54 inches. *See, e.g.*, 36  
6 St. & Broadway; Afton Place; Avalon Place; Hudson; Lyndon Hotel;  
7 Miramar; Park Place; The Serrano; Sheraton Town House; Terre  
8 One; The Whitter. UFAS §§ 4.1.2(12), 4.1.6, 4.2.6, 4.27.3; Fair  
9 Housing Accessibility Guidelines Req. 2 (ANSI A117.1-1986 §§  
10 4.2.5, 4.25.3); 2010 ADA Standards 206.2;

11 135. Centralized mail receptacles more than 48 inches above the ground.  
12 *See, e.g.*, Rittenhouse Square; The Serrano; Witmer. UFAS §§  
13 4.1.2(12), 4.2.6, 4.27.3; Fair Housing Accessibility Guidelines Req.  
14 2, (ANSI A117.1-1986 §§ 4.2.6, 4.25.3); 2010 ADA Standards 205,  
15 308, 309.3; and

16 136. No accessible routes provided to mailboxes. *See, e.g.*, EHOP. UFAS  
17 §§ 4.1.2(12), 4.1.6, 4.34.2.

18 **II. Violations of Federal Accessibility Laws at Properties the City and the**  
19 **CRA/LA Funded with HUD Funds.**

20 The following include violations of the federal accessibility laws in specific  
21 dwelling units of buildings that the City and the CRA/LA funded with federal financial  
22 assistance:

23 **A. Inaccessible doors without sufficient maneuvering space or time**

24 137. Doors where the sweep period from an open position to closing is  
25 less than three seconds. *See, e.g.*, Buckingham Place 107, Vista  
26 Monterey 106. UFAS § 4.13.10;

27 **B. Inaccessible doors that are not wide enough**

- 1 138. Doors clear openings less than 32 inches wide. *See, e.g.*, The Lofts  
2 474, Buckingham Place 107. UFAS §§ 4.1.2, 4.1.6, 4.13.5, Figure  
3 24(b), 4.34.2(3); Fair Housing Accessibility Guidelines Req. 3,  
4 Guideline 2; and  
5 139. Patio door clear openings less than 32 inches wide. *See, e.g.*,  
6 Buckingham Place 107. UFAS §§ 4.13.5, 4.34.2(15), Figure 24.

7 **C. Inaccessible doors because thresholds are too tall or not beveled**

- 8 140. Entrance thresholds taller than one-half inch tall on either side, or  
9 taller than one-quarter inch and not beveled. *See, e.g.*, The Lofts 474,  
10 Vista Monterey 106. UFAS §§ 4.1.2(7) and (8), 4.1.6, 4.13.8,  
11 4.34.2(6), 4.34.2(15)(d); Fair Housing Accessibility Guidelines Req.  
12 4, Guideline 4;  
13 141. Balcony door thresholds taller than three-quarters of an inch on either  
14 side, or taller than one-quarter inch and not beveled. *See, e.g.*, Vista  
15 Monterey 106. UFAS §§ 4.13.8, 4.34.2(6), 4.34.2(15)(d);  
16 142. The maneuvering clearance at the latch side of the door is not a  
17 minimum of 12 inches. *See, e.g.*, The Lofts 474. UFAS § 4.13.6,  
18 Figure 25(a);  
19 143. The maneuvering clearance at the latch side of the door is not a  
20 minimum of 24 inches and the depth is less than 48 inches  
21 perpendicular to the door. *See, e.g.*, Vista Monterey 106. UFAS  
22 4.13.6, Figure 25(c); and  
23 144. Bathroom shower thresholds taller than one-half inch or taller than  
24 one-quarter inch and not beveled. *See, e.g.*, Buckingham Place 107.  
25 UFAS §§ 4.1.2, 4.1.6, 4.13.8, 4.34.2(3).

26 **D. Inaccessible bedrooms**

- 27 145. The closet rod is mounted greater than the maximum height of 54  
28

1 inches. *See, e.g.*, Buckingham Place 107, Encore Hall 202, Metro  
2 Hollywood 203, Vista Monterey 106. UFAS §§ 4.25.3, Figure 38;  
3 and

4 146. The closet shelf is mounted greater than the maximum of 54 inches  
5 above the finished floor. *See, e.g.*, Buckingham Place 107, Encore  
6 Hall 202, Metro Hollywood 203, Vista Monterey 106. UFAS §§  
7 4.25.3, Figure 384.2.6, 4.25.6, Figure 6(a) and (b).

8 **E. Inaccessible kitchens**

9 147. The sink and surrounding counter is mounted more than a maximum  
10 height of 34 inches above the finished floor. *See, e.g.*, Metro  
11 Hollywood 203, Vista Monterey 106. UFAS §§ 4.34.6.5(1), Figure  
12 51;

13 148. Kitchen work surface heights exceed the maximum height of 34  
14 inches above the finished floor, or the counter or work surface is  
15 mounted 36 inches above the finished floor and is not adjustable or  
16 replaceable as a unit to provide alternative heights of 28 inches, 32  
17 inches, and 36 inches. *See, e.g.*, The Gallery, The Lofts 474,  
18 Vermont Senior 1215, Vista Monterey 106. UFAS § 4.34.6.4(1),  
19 Figure 50(b);

20 149. Kitchens without at least one wall cabinet or shelf above the work  
21 surface that are no more than forty-eight inches from the floor. *See,*  
22 *e.g.*, Metro Hollywood 203. UFAS §§ 4.34.3(13), 4.36.6.10;

23 150. Kitchens without a 30-inch wide accessible work surface no higher  
24 than 34 inches with knee and toe space underneath. *See, e.g.*,  
25 Buckingham Place 107. UFAS §§ 4.34.6.4(4), Figure 50;

26 151. Hood light and fan switches more than 48 inches above the floor not  
27 repeated within reach on separate switches. *See, e.g.*, Encore Hall,  
28

1 202. UFAS §§ 4.2.6, 4.34.2(9); 2010 ADA Standards §§ 205, 233,  
2 308, 309.3;

3 152. Ovens not adjacent to accessible work surfaces, and/or not self-  
4 cleaning. *See, e.g.*, The Galley, Vermont Senior 1215, Vista  
5 Monterey 106. UFAS §§ 4.34.2(13), 4.34.6.4(1), Figure 50, 4.34.6.7;  
6 2010 ADA Standards §§ 212, 233, 212, 804.3, 804.6.5.2;

7 153. Oven controls not located on the front panel. *See, e.g.*, The Lofts,  
8 474, Vista Monterey 106. UFAS § 4.34.6.7;

9 154. The microwave controls are mounted greater than the maximum 54  
10 inches above the finished floor for a side approach. *See, e.g.*, The  
11 Lofts, 474. UFAS § 4.2.6; 4.34.6.6, Figure 6(a) and (b);

12 155. The dishwasher controls require tight grasping, pinching or twisting  
13 of the wrist to operate. *See, e.g.*, Metro Hollywood 203. UFAS §  
14 4.34.6.9, 4.34.6.3, 4.27.4;

15 156. U-shaped kitchens without a 60-inch diameter clear floor-turning  
16 space. *See, e.g.*, Vermont Senior 1215. UFAS §§ 4.34.2(13),  
17 4.34.6.1; Fair Housing Accessibility Guidelines Req. 7 Guideline 1(c)  
18 (ANSI A117.1-1986 § 4.32.5);

19 157. Base cabinets are not removable under the full 30-inch minimum  
20 frontage of the work counters. *See, e.g.*, The Gallery 221, The Lofts  
21 474; Vermont Senior 1215; Vista Monterey 106. UFAS §  
22 4.34.6.4(2); Figure 50(a) and (b);

23 158. The finished floor does not extend to the wall under the work surface.  
24 *See, e.g.*, The Gallery 221, The Lofts 474; Vermont Senior 1215,  
25 Vista Monterey 106. UFAS § 4.34.6.4(2);

26 159. The hot water and drainpipes are not insulated or otherwise covered.  
27 *See, e.g.*, The Gallery 221, The Lofts 474, Vermont Senior 1215,  
28

1 Vista Monterey 106. UFAS § 4.34.65(8);

2 160. The height of a shelf of wall cabinets mounted above the work  
3 surface exceeds the maximum of 48 inches above the finished floor.  
4 *See, e.g.*, Buckingham Place 107, The Gallery 221, The Lofts 474,  
5 Vista Monterey 106. UFAS § 4.34.6.10(1), Figure 50; and

6 161. Range controls are located on the back panel requiring a reach across  
7 burners. *See, e.g.*, Vista Monterey 106. UFAS §§ 4.34.2(13),  
8 4.34.6.7; and

9 162. The highest operable part of the light or fan control is mounted  
10 greater than the maximum of 54 inches above the finished floor. *See,*  
11 *e.g.*, Encore Hall 202, Metro Hollywood 203. UFAS §§4.2.6, Figures  
12 6(a) and (b).

13 **F. Inaccessible laundry facilities**

14 163. The washing machine is not front-loading. *See, e.g.*, The Gallery  
15 221, The Lofts 474. UFAS § 4.34.7.2; and

16 164. The washer or dryer controls require tight grasping, pinching, or  
17 twisting of the wrist to operate. *See, e.g.*, The Lofts 474. UFAS §  
18 4.34.7.3, 4.27.4.

19 **G. Inaccessible bathrooms**

20 165. Lavatories without a minimum knee clearance of at least 29 inches.  
21 *See, e.g.*, Encore Hall 202, Metro Hollywood 203, Vista Monterey  
22 106. UFAS §§ 4.34.5.3(1), 4.22.6, 4.19.2, Figure 31;

23 166. Pipes under accessible lavatories not properly insulated to protect  
24 people from burns and sharp or abrasive edges. *See, e.g.*, The Gallery  
25 221, The Lofts 474, Metro Hollywood 203. UFAS §§ 4.19.4, 4.22.6,  
26 4.34.2(12), 4.34.5.3; Fair Housing Accessibility Guidelines Req. 7  
27 (ANSI A117.1-1986 § 4.19.4);  
28

- 1 167. Bathtubs without a securable seat. *See, e.g.*, The Gallery 221, The  
2 Lofts 474, Vista Monterey 106. UFAS §§ 4.34.2(12), 4.34.5.4(2);  
3 4.26.3. Figure 33; 2010 ADA Standards §§ 233, 607.3, 809.4;
- 4 168. Bathtubs lacking two back grab bars of at least 24 inches in length  
5 mounted to no more than 12 inches from the foot of the tub. *See,*  
6 *e.g.*, Metro Hollywood 203. UFAS 4.34.5.4(3), Figure 34(a).
- 7 169. Shower seats that do not extend the full length of the seat wall to  
8 within one and one-half inches of the back wall or to within three  
9 inches of the compartment entry. *See, e.g.*, Buckingham Place 107.  
10 UFAS §§ 4.34.5.5(2), Figure 35(a), Figure 36;
- 11 170. Lack of a shower seat on the wall opposite from the shower controls.  
12 *See, e.g.*, Encore Hall 202. UFAS §§ 4.34.5.5(2), Figure 35;
- 13 171. Shower stall that has a curb that exceeds the maximum height of one  
14 half inch. *See, e.g.*, Encore Hall 202. UFAS §§ 4.21.7.
- 15 172. Shower stall is not a minimum of 36 inches by 36 inches or 30 inches  
16 by 60 inches. *See, e.g.*, Buckingham Place 107. UFAS §  
17 4.34.5.5.(1), Figure 35(a) and (b).
- 18 173. Bathtub controls not mounted between the midpoint and the open end  
19 of the tub, and bathtubs without a handheld shower unit. *See, e.g.*, .  
20 UFAS §§ 4.34.2(12), 4.34.5.4(4) and (5);
- 21 174. Shower spray units without a minimum 60-inch long hose. *See, e.g.*,  
22 The Gallery 221, The Lofts 474. UFAS § 4.34.5.4(5);
- 23 175. Toilets with a centerline more or less than 18 inches from the  
24 sidewall. *See, e.g.*, Encore Hall 202, Vermont Senior 1215, Vista  
25 Monterey 106. UFAS §§ 4.34.2(12), 4.34.5.2(1); Fair Housing  
26 Accessibility Guidelines Req. 7 Guidelines 2(a)(ii) and 2(b)(iv);
- 27 176. Toilet paper dispensers not on the nearest sidewall, or more than 36  
28

1 inches from the back wall. *See, e.g.*, The Gallery 221; The Lofts 474,  
2 Metro Hollywood 203, Vermont Senior 1215, Vista Monterey 106.  
3 UFAS §§ 4.34.2(12), 4.34.5.2(4), Figure 47(b); 2010 ADA Standards  
4 §§ 213.2, 604.7;

5 177. Medicine cabinets, where provided, with a lowest shelf more than 44  
6 inches from the floor. *See, e.g.*, The Lofts 474, Metro Hollywood  
7 203, Vista Monterey 106. UFAS §§ 4.19.3, 4.22.6, 4.34.2(12),  
8 4.34.5.3(3);

9 178. Tub faucet hardware that requires tight grasping, twisting or pinching  
10 of the wrist to operate. *See, e.g.*, Metro Hollywood 203. UFAS §  
11 4.27.4; and

12 179. Consumer information about the adaptability of the unit is not  
13 provided to inform the resident of the provisions for the installation  
14 of grab bars at the water closets, bathtubs, and showers. *See, e.g.*,  
15 The Gallery 221, The Lofts 474, Metro Hollywood 203, Vista  
16 Monterey 106. UFAS § 4.34.3, 4.34.4.

17 **H. Other accessibility violations**

18 180. Windows with locking mechanisms mounted too high. *See, e.g.*,  
19 Yale Terrace 202, 303. UFAS §§ 4.2.6, 4.27.3, 4.34.2(9).

20 The following include violations of the federal accessibility laws in general,  
21 common use, or public areas of buildings that the City and the CRA/LA funded with  
22 federal financial assistance:

23 **I. Inaccessible routes**

24 181. Doors with pull-side forward approaches that do not have  
25 maneuvering space 60 inches deep or space extending 18 inches to  
26 the latch side of the doorway. *See, e.g.*, Yale Terrace. UFAS §§  
27 4.1.2(7) and (8); 4.1.6, 4.3.9, 4.13.6, Figure 25(a); Fair Housing  
28

- 1 Accessibility Guidelines 2, 3 (ANSI A117.1-1986 § 4.13.6); 2010  
2 ADA Standards for Accessible Design (“2010 ADA Standards”) §§  
3 206.5, 404.2.4.1; 1991 ADA Standards §§ 4.1.3(7) and (8), 4.13.6;
- 4 182. Doors with push-side forward approaches with latches and closers  
5 that do not have maneuvering space 48 inches deep or space  
6 extending 12 inches to the latch side of the doorways. *See, e.g.,* Yale  
7 Terrace. UFAS §§ 4.1.2(7) and (8); 4.1.6, 4.3.9, 4.13.6, Figure 25(a);  
8 Fair Housing Accessibility Guidelines 2, 3 (ANSI A117.1-1986 §  
9 4.13.6); 2010 ADA Standards §§ 206.5, 404.2.4.1; 1991 ADA  
10 Standards §§ 4.1.3(7) and (8), 4.13.6;
- 11 183. Fire extinguishers, cabinets, drop boxes, counters, door closers,  
12 drinking fountains and other objects that protrude more than four  
13 inches into the circulation path where the bottom of the objects are  
14 more than 27 inches above the ground. *See, e.g.,* Amistad, The Lofts,  
15 and Yale Terrace. UFAS §§ 4.1.2(2), 4.1.6, 4.4.1; Fair Housing  
16 Accessibility Guidelines Req. 2 (ANSI A117.1-1986 § 4.4.1); 2010  
17 ADA Standards §§ 204.1, 307.2;
- 18 184. Maneuvering space at doors, accessible routes, passenger loading  
19 zones, and ramp landings with a slope or cross slope that exceeds two  
20 percent. *See, e.g.,* Buckingham Senior, Yale Terrace. UFAS §§  
21 4.1.2, 4.1.6, 4.3.7, 4.6.5, 4.8.4, 4.13.6; Fair Housing Accessibility  
22 Guidelines 2 (ANSI A117.1-1986 §§ 4.3.7, 4.8.4, 4.13.6); 2010 ADA  
23 Standards §§ 209.1, 302, 402.2, 403, 404, 405, 503.4; 1991 ADA  
24 Standards 4.1.2(1) and (2), 4.1.3(1), 4.3.7;
- 25 185. Ramps with a slope that exceeds 8.33 percent. *See, e.g.,* Amistad,  
26 Encore Hall, The Gallery, Metro Hollywood, Vista Monterey, Yale  
27 Terrace. UFAS §§ 4.1.2, 4.1.6, 4.8.1, 4.8.2; Fair Housing  
28

1 Accessibility Guidelines Reqs. 1, 2 (ANSI A117.1-1986 § 4.8.2);  
2 2010 ADA Standards §§ 206.1, 405.2; 1991 ADA Guidelines  
3 4.1.2(1) and (2), 4.1.3(1), 4.8.2;

4 186. Abrupt changes in level on accessible routes exceeding one-half inch  
5 without an elevator, lift, or ramp. *See, e.g.*, Yale Terrace. UFAS §§  
6 4.1.1(1), 4.1.2, 4.1.6, 4.3.8; Fair Housing Accessibility Guidelines  
7 Reqs. 1, 2 (ANSI A117.1-1986 § 4.3.7, 4.3.8); 2010 ADA Standards  
8 §§ .206.1, 303.4;

9 187. Routes that are not constructed as a ramp with a slope that exceeds  
10 five percent. *See, e.g.*, The Gallery. UFAS §§ 4.1.1(1), 4.1.2, 4.1.6,  
11 4.3.7, 4.8.1; Fair Housing Accessibility Guidelines Reqs. 1, 2 (ANSI  
12 A117.1-1986 § 4.3.7);

13 188. Operable parts of property call boxes and rent drop boxes installed  
14 too high because they are blocked by an obstruction more than 34  
15 inches tall and they are not within 54 inches of the floor. *See, e.g.*,  
16 Buckingham Senior, Encore Hall. UFAS §§ 4.1.2(12), 4.1.6, 4.2.6,  
17 4.25.3; Fair Housing Accessibility Guidelines Req. 2 (ANSI A117.1-  
18 1986 § 4/2/6, 4.25.3);

19 189. Ramp landings less than 60 inches long. *See, e.g.*, Encore Hall.  
20 UFAS §§ 4.1.2(1), 4.1.6, 4.8.4;

21 190. Thresholds at landings or in doorways that are taller than one-half  
22 inch and that are not beveled. *See, e.g.*, Amistad, Yale Terrace.  
23 UFAS §§ 4.1.2(7), 4.1.6, 4.13.8; Fair Housing Accessibility  
24 Guidelines Req. 2, 4 (guidelines (4) and (6)), (ANSI A117.1-1986 §  
25 4.13.8); 2010 ADA Guidelines 206.1, 303.3, 303.4;

26 191. Areas without an accessible route. *See, e.g.*, The Gallery, Vista  
27 Monterey. UFAS §§ 4.3.8, 4.5.2, Figure 7(c) and (d);  
28

- 1 192. Areas where the minimum clear width along the route is less than 36  
2 inches. *See, e.g.,* The Lofts. UFAS § 4.3.3, Figure 7(a);  
3 193. Curb ramps with cross slopes that exceed two percent. *See, e.g.,* The  
4 Gallery, Vista Monterey. UFAS §§ 4.7.2, 4.8.2, 4.8.6;  
5 194. Curb ramp obstructions due to location or failure to protect  
6 obstruction. *See, e.g.,* Vista Monterey. UFAS § 4.7.8;  
7 195. Handrail gripping surface is not mounted between 30 and 34 inches  
8 above the ramp surface. *See, e.g.,* Encore Hall, Metro Hollywood.  
9 UFAS § 4.8.5(5); and  
10 196. Stairways that do not have cane detectable barriers. *See, e.g.,* Imani  
11 Fe. UFAS § 4.4.2.

12 **J. Inaccessible signs**

- 13 181. Improperly located signs. *See, e.g.,* Yale Terrace. UFAS §§  
14 4.1.2(15), 4.1.3(16), 4.1.6, 4.4.1, 4.30.4, 4.30.6; Fair Housing  
15 Accessibility Guidelines Req. 2 (ANSI A117.1-1986 § 4.4.1); 2010  
16 ADA Standards §§ 216.2, 703.4; 1991 ADA Standards 4.1.3(16)(a),  
17 4.30.6;  
18 182. No signage with the International Symbol of Accessibility displayed  
19 to direct guests to the accessible entrance, accessible parking, or  
20 accessible restrooms. *See, e.g.,* Amistad, The Gallery, Vista  
21 Monterey. UFAS §§ 4.1.1(7)(c), 4.30, Figure 43; 4.34.2(2), 4.6.4,  
22 4.30.5 and  
23 183. Signs for handicapped parking spots that are missing or not visible.  
24 *See, e.g.,* Amistad, Hollywood, Vermont Senior. UFAS §§ 4.1.1(5)  
25 and (7), 4.6.4, 4.30.5; Fair Housing Accessibility Guidelines Reqs. 1,  
26 2, (ANSI A117.1-1986 § 4.6.2).

27 **K. Inaccessible handicapped parking**

- 1 184. Insufficient numbers of handicapped parking spots because there are  
2 not accessible spots for each required accessible unit. *See, e.g.*,  
3 Amistad, Imani Fe, Yale Terrace. UFAS §§ 4.1.1(5)(d)(i) and (ii),  
4 4.34.2(2); Fair Housing Accessibility Guidelines Req. 2; 2010 ADA  
5 Standards § 208.2.3;
- 6 185. Areas with no designated accessible parking spaces. *See, e.g.*, The  
7 Gallery. UFAS §§ 4.1.1(5)(a);
- 8 186. Handicapped parking access aisles or parking spots that slope more  
9 than two percent. *See, e.g.*, Amistad, Encore Hall, The Gallery, The  
10 Lofts. UFAS §§ 4.34.2(2), 4.6.3; and
- 11 187. Handicapped parking spot access aisles that do not have an  
12 unobstructed aisle running the length of the car. *See, e.g.*, The  
13 Gallery. UFAS § 4.6.3, Figure 9.

14 **L. Inaccessible common use restrooms**

- 15 188. Door opening force exceeds five pounds. *See, e.g.*, Buckingham  
16 Senior, Encore Hall, The Gallery, Vermont Senior. UFAS §  
17 4.13.11(2)(b);
- 18 189. Toilet paper dispensers are more than 36 inches from the rear wall,  
19 and their centerlines are not between seven and nine inches in front of  
20 the toilet. *See, e.g.*, Amistad, Buckingham Senior, Encore Hall, The  
21 Gallery, The Lofts, Vista Monterey. UFAS §§ 4.34.2(2), 4.16.6,  
22 Figure 29(b); 30(d); Fair Housing Accessibility Guidelines Req. 2  
23 (ANSI A117.1-1986 § 4.16.6); 2010 ADA Standards §§ 213.2,  
24 213.3.2, 604.7;
- 25 190. Sharp and abrasive surfaces on pipes under the sink are not insulated  
26 to protect against injury. *See, e.g.*, Amistad, Yale Terrace. UFAS §§  
27 4.1.2(10), 4.1.6, 4.19.4; Fair Housing Accessibility Guidelines Req. 2  
28

1 (ANSI A117.1-1986 § 4.19.4);

2 191. Sidewall toilet grab bars are not at least 42 inches long, not within 12  
3 inches of the rear wall, or not extending at least 54 inches from the  
4 rear wall. *See, e.g.,* Amistad, Yale Terrace. UFAS §§ 4.1.2(10),  
5 4.1.6, 4.16.4, 4.17.6, Figure 29(b); Fair Housing Accessibility  
6 Guidelines Req. 2 (ANSI A117.1-1986 § 4.16.4); 2010 ADA  
7 Standards §§ 213.2, 605.1, 604.5.1, 604.8.1.5;

8 192. Toilet paper dispensers that are not mounted on a side wall with a  
9 grab bar. *See, e.g.,* Yale Terrace. UFAS §§ 4.34.2(12), 4.34.5.2(4);

10 193. Restroom lavatories without the minimum knee and/or toe clearance  
11 or where the knee and/or toe clearance is blocked by objects. *See,*  
12 *e.g.,* Yale Terrace. UFAS §§ 4.34.2(12), 4.34.5.3;

13 194. Toilet drain piping provides less than the specified minimum nine-  
14 inch toe clearance. *See, e.g.,* Buckingham Senior. UFAS §§  
15 4,34,2(1), 4.19.2;

16 195. Toilet centerlines more or less than 18 inches from the sidewall. *See,*  
17 *e.g.,* The Gallery, The Lofts, Vista Monterey. UFAS §§ 4.1.6, 4.16.2,  
18 Figure 28; Fair Housing Accessibility Guidelines Req. 2 (ANSI  
19 A117.1-1986 § 4.16.2);

20 196. Toilet paper dispensers not mounted on a side wall that has a grab  
21 bar. *See, e.g.,* Yale Terrace. UFAS §§ 4.1.2(10), 4.1.6, 4.16.6,  
22 Figure 29(b); Fair Housing Accessibility Guidelines Req. 2 (ANSI  
23 A117.1-1986 § 4.16.6);

24 197. Paper towel or toilet seat cover dispensers that are less than eighteen  
25 inches above toilet grab bars, blocking the required clear space. *See,*  
26 *e.g.,* Yale Terrace. UFAS §§ 4.1.2(10), 4.1.6, 4.16.4, 4.26.2; Fair  
27 Housing Accessibility Guidelines Req. 2 (ANSI A117.1-1986 §  
28

1 4.24.2);

2 198. Mirrors with a reflective surface more than 40 inches from the floor.  
3 *See, e.g.*, Amistad, Vermont Senior. UFAS §§ 4.34.2(2), 4.19.6; Fair  
4 Housing Accessibility Guidelines Req. 2 (ANSI A117.1-1986 §  
5 4.19.6);

6 **M. Inaccessible laundry rooms**

7 199. When washers and dryers are provided, there are no front loading  
8 machines. *See, e.g.*, Encore Hall, The Gallery, Vista Monterey.  
9 UFAS § 4.34.7.2; Fair Housing Accessibility Guidelines Req. 2,  
10 (ANSI A117.1-1986 § 4.32.6.2);

11 200. Sink faucet hardware cannot be operated without tight grasping, tight  
12 pinching, or twisting of the wrist. *See, e.g.*, Amistad. UFAS §  
13 4.34.6.5(4);

14 201. Electrical outlet mounted at greater than the specified 46 inches for a  
15 reach ranger over an obstruction. *See, e.g.*, Buckingham Senior.  
16 UFAS §§ 4.34.2(1), 4.2.6; and

17 202. Washer/dryer controls require tight grasping, pinching, or twisting of  
18 the wrist to operate. *See, e.g.*, Encore Hall. UFAS §§ 4.34.7.3,  
19 4.27.4.

20 **N. Inaccessible community or other multi-purpose rooms**

21 203. Paper towel dispensers not accessibly located because they require a  
22 side reach over an obstruction more than 34 inches tall, and the  
23 dispensers are more than ten inches back from the front edge of the  
24 obstruction and/or more than 48 inches from the floor. *See, e.g.*, Yale  
25 Terrace. UFAS §§ 4.1.2(12), 4.1.6, 4.27.3;

26 204. Range hood switches more than 46 inches above the floor for a side  
27 reach range over an obstruction. *See, e.g.*, Buckingham Senior.  
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1 UFAS §§ 4.34.2(1), 4.27; Fair Housing Accessibility Guidelines Req.  
2 2 (ANSI A117.1-1986 §§ 4.2.5, 4.25.3); 2010 ADA Standards §§  
3 205.1;

4 205. Sharp and abrasive surfaces on the pipes or garbage disposal under  
5 the sink not insulated to protect against injury. *See, e.g.*, Yale  
6 Terrace). UFAS §§ 4.1.2(10), 4.1.6, 4.19.4;

7 206. Table seating without clearance 30 inches wide, 27 inches high, and  
8 19 inches deep, for five percent of the seats. *See, e.g.*, The Gallery.  
9 UFAS §§ 4.32.3, Figure 45; Fair Housing Accessibility Guidelines  
10 Req. 2 (ANSI A117.1-1986 § 4.30); 2010 ADA Standards §§ 226.1,  
11 226.2, 305, 306, 902.2;

12 207. Shelving mounted at greater than the specified reach range of 44  
13 inches for a forward reach over an obstruction. *See, e.g.*,  
14 Buckingham Senior. UFAS §§ 4.34.2(1), 4.2.5;

15 208. Common use work surfaces that are taller than 34 inches, or that do  
16 not have knee clearance of 27 inches. *See, e.g.*, Buckingham Senior,  
17 The Gallery, Yale Terrace. UFAS §§ 4.34.2(13), 4.36.10, 4.25;

18 209. Door threshold greater than one-half inch without beveled edges.  
19 *See, e.g.*, The Gallery. UFAS §§ 4.13.8, 4.5.2;

20 210. Door has an opening force that exceeds five lbf. *See, e.g.*, The  
21 Gallery. UFAS §§ 4.13.11(2)(b);

22 211. Window blind cords mounted greater than the specified 48 inches.  
23 *See, e.g.*, Buckingham Senior. UFAS §§ 4.34.2(1), 4.27.3;

24 **O. Inaccessible trash rooms**

25 212. Trash chute door that cannot be opened with five-pounds or less of  
26 force. *See, e.g.*, Amistad, Buckingham Senior. UFAS §§ 4.1.2(12),  
27 4.1.6, 4.27.4;

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- 1           213. Trash chute hardware that cannot be operated without tight grasping,  
2           tight pinching, or twisting of the wrist. *See, e.g.,* Vista Monterey.  
3           UFAS § 4.27.4;
- 4           214. Trash room signage mounted on the face of the door, rather than on  
5           the wall at the latch side and mounted 60 inches to the highest tactile  
6           character. *See, e.g.,* Amistad. UFAS §§ 4.34.2(2), 4.30.6;
- 7           215. Maneuvering clearance of less than the specified 12-inch minimum  
8           clearance for a door with a closer and latch. *See, e.g.,* Amistad.  
9           UFAS §§ 4.34.2(2), 4.13.6, Fig. 25(a);
- 10          216. Trash room light switch requires tight grasping, pinching, or twisting  
11          to operate. *See, e.g.,* Amistad. UFAS §§ 4.34.2(2), 4.27.4;
- 12          217. Maneuvering surface at the trash room door has a slope greater than  
13          the specified maximum. *See, e.g.,* Amistad. UFAS §§ 4.34.2(2),  
14          4.13.6;
- 15          218. Entry doors require greater than the five pounds of force to open.  
16          *See, e.g.,* Buckingham Senior. UFAS §§ 4.34.2(1), 4.13.11; and
- 17          219. Vent housing for a ceiling-mounted vent projects more than four  
18          inches out from the side wall with a head height of less than 80-inch  
19          clearance. *See, e.g.,* Buckingham Senior. UFAS §§ 4.34.2(1), 4.4.1,  
20          4.4.2.

21          **P. Inaccessible mail facilities**

- 22          220. Mailboxes or a portion of mailboxes, above 54 inches. *See, e.g.,*  
23          Amistad, The Gallery, The Lofts, Metro Hollywood. UFAS §§  
24          4.34.2(1), 4.4.1, 4.4.2; 2010 ADA Standards 204.1; and
- 25          221. The cross slope of the route provided to the mailboxes exceeds two  
26          percent. *See, e.g.,* The Gallery. UFAS § 4.3.7.
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1           **Q.    Inaccessible elevators**

2           222. Hall call buttons are not centered 42 inches above the finished floor.  
3                 *See, e.g., The Gallery. UFAS § 4.10.3, Figure 20;*

4           223. Door protective and reopening device stays open for less than 20  
5                 seconds. *See, e.g., The Gallery, The Lofts. UFAS § 4.10.6;*

6           224. Elevator car emergency controls either do not have an emergency  
7                 stop control or are not grouped at the bottom of the control panel.  
8                 *See, e.g., The Gallery. UFAS § 4.10.12(3), Figure 23(a), (b);*

9           225. Elevator’s self-leveling feature does not automatically bring the car to  
10                the floor landings within a tolerance of one half inch or less. *See,*  
11                *e.g., Metro Hollywood. UFAS § 4.10.2; and*

12           226. There is no audible signal to announce the direction (“up” or “down”)  
13                of the elevator. *See, e.g., The Gallery. UFAS § 4.10.4.*

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