

**TM 2014-24****Location (Accessible Routes)**

Effective Date: August 15, 2014

2012 TAS Reference: 206.3

In accordance with TAS 206.3, the location of accessible routes must coincide with or be located in the same area as the general circulation path and Advisory 206.3 clarifies that an accessible route must be in the same area as stairs and escalators.

Although the term “*same area*” is not defined in TAS, it shall mean “*not in a different section of space within a building*” based on TAS 106.3 and the definitions from collegiate dictionaries of “*same*” and “*area*” in the sense that the text implies.

For example, if a new circulation path (i.e. stairs) is constructed within a tenant space, an accessible route shall also be located within the tenant space.

In determining whether or not the location of an accessible route would adequately meet the needs of people with disabilities, the Department has taken the following factors into consideration based on TAS 201.1:

- (i) *population to be served*
- (ii) *availability to the user;*
- (iii) *location relative to distance and time;*
- (iv) *location relative to isolation and separation;*
- (v) *function of the building or facility; and*
- (vi) *equal treatment and opportunity*

This clarification does not constitute a substantive change to the compliance requirements of TAS 206.3.