



ADA TITLE II ASSESSMENT



Prepared for:

Montgomery County Public Schools
45 West Gude Drive, Suite 4100
Rockville, Maryland 20850

ADA TITLE II ASSESSMENT

Dr. Martin Luther King Middle School
13737 Wisteria Drive
Germantown, Maryland 20874

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1 Accessibility

Generally, Title II of the Americans with Disabilities Act (ADA) prohibits discrimination by entities to access and use of the government entity's programs, services, and facilities on the basis of disability. Regardless of their age, these areas and facilities must be maintained and operated to comply with the Americans with Disabilities Act Accessibility Guidelines (ADAAG), and applicable state and local accessibility regulations.

Buildings completed and occupied after January 26, 1992 are required to comply fully with ADAAG. Existing facilities constructed prior to this date are held to the lesser standard of complying to the extent allowed by structural feasibility and the financial resources available, or a reasonable accommodation must be made. The ADA guidelines were clarified and amended in 2010 based on a clarification by the Department of Justice known as the "2011 Site Construction Tolerances Addendum to the 2010 ADA Standards for Accessible Design." The aforementioned document defines the acceptable and allowed construction tolerances above or below the requirements established in the 2010 ADA Standards for barriers related to:

- Accessible Parking
- Pedestrian Path of Travel
- Building Entrances
- Interior Spaces

The scope of the ADA Assessment, as defined in the scope of work, is limited to exterior and interior areas covered by the ADA.

Based on the onsite review, EMG found that barriers to accessibility exist at Dr. Martin Luther King Middle School. The observed elements were analyzed using the 2010 ADA Standards for Accessible Design and state accessibility codes.

1.1 Accessibility Summary Table

Based on the onsite review, EMG found that barriers to accessibility exist at Dr. Martin Luther King Middle School. The observed elements were analyzed using the 2010 ADA Standards for Accessible Design and state accessibility codes.

EMG's assessment of the subject property identified the following areas of concern:

Facility / Building	Priority 1 Items	Priority 2 Items	Priority 3 Items	Priority 4 Items	Priority 5 Items	Total Items
Dr Martin Luther King Middle School	65	12	8	1	26	112
Grand Total	65	12	8	1	26	112

1.2 Barrier Summary Table

The following table summarizes the barriers that were identified. The costs provided are order of magnitude estimates. Costs will vary depending upon the location and volume of work performed. Individual observation details may be found in Appendix A.

Id	Facility	Building	Assembly	Type	Barrier Priority	Detail	Location Description	ADA
109398	Dr Martin Luther King Middle School	ATHLETIC FIELDS	Exterior Access Route	Exterior Accessible Route	1	A compliant accessible route is not provided from the property line to the site facilities.	Baseball Filed 1 and 2	ADA
109948	Dr Martin Luther King Middle School	ATHLETIC FIELDS	Basketball Court	Sport Court	1	An accessible route does not directly connect each side of the court outside of play lines.	Gym	ADA
109372	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Curb Ramp	1	The curb ramp surface has vertical height changes greater than 1/4" that are not ramped.	CR5	ADA
109392	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Ramp	1	The handrails are not compliant.	R4	ADA
109394	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Stairs	1	Handrails are not provided.	STR9	ADA
109891	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Exterior Accessible Route	1	The accessible route has cross slopes greater than 1:50 (2%).	Sidewalk from R4 to Baseball Fields	ADA
109892	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Exterior Accessible Route	1	Sidewalk does not meet the 36" minimum clear width requirement (60" minimum where passing areas are present).	Sidewalk around Multi-Use Filed	ADA
109893	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Protruding Object	1	Protruding objects in the 27" to 80" range above finished floor protrude more than 4" into the circulation path along the accessible route.	Sidewalk around Multi-Use Field	ADA
109894	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Ramp	1	The ramp is required but not provided.	R5	ADA
109895	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Ramp	1	The handrails are not compliant.	R5	ADA
109896	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Ramp	1	The ramp is required but not provided.	R6	ADA
109897	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Ramp	1	The handrails are not compliant.	R6	ADA
109898	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Ramp	1	The ramp is required but not provided.	R7	ADA
109899	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Ramp	1	The handrails are not compliant.	R7	ADA
109900	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Ramp	1	The ramp is required but not provided.	R8	ADA
109901	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Ramp	1	The handrails are not compliant.	R8	ADA
109902	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Exterior Accessible Route	1	The accessible route has cross slopes greater than 1:50 (2%).	Sidewalk from R8 to Parking Lot 2	ADA
109373	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Curb Ramp	1	A landing at the top of the curb ramp is not present.	CR5	ADA
109374	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Curb Ramp	1	A landing at the top of the curb ramp is not present.	CR4	ADA
109375	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Curb Ramp	1	The curb ramp does not meet the slope requirements.	CR5	ADA
109381	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Exterior Accessible Route	1	The accessible route has cross slopes greater than 1:50 (2%).	East Sidewalk from the Accessible Parking to the Athletic Fields	ADA
109382	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Exterior Accessible Route	1	Sidewalk has areas of vertical level changes in excess of 1/4" that are not ramped.	Adjacent to STR8	ADA
109383	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Exterior Accessible Route	1	Sidewalk has areas of vertical level changes in excess of 1/4" that are not ramped.	Sidewalk adjacent to STR8	ADA
109384	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Stairs	1	Handrail extensions are not compliant.	STR8	ADA
109385	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Stairs	1	Handrails are not compliant.	STR8	ADA
109386	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Exterior Accessible Route	1	Sidewalk has areas of vertical level changes in excess of 1/4" that are not ramped.	Sidewalk Adjacent to R2	ADA
109387	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Ramp	1	The ramp does not have a level landing at the top and/or bottom of each run.	R2	ADA
109388	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Ramp	1	The ramp is required but not provided.	R3	ADA

Id	Facility	Building	Assembly	Type	Barrier Priority	Detail	Location Description	ADA
109903	Dr Martin Luther King Middle School	EXTERIOR	Entrance to Building	Building Entrance-Door	1	The maneuvering clearance at the accessible door is not level and clear.	Doors 9, 10 and 11	ADA
109904	Dr Martin Luther King Middle School	EXTERIOR	Entrance to Building	Building Entrance-Door	1	The pull side of the accessible door does not have the required maneuvering clearances.	Doors 9 and 11	ADA
109905	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Loading/Unloading Zone	1	The access aisle is not marked.	Parking Lot 3	ADA
109906	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Curb Ramp- Diagonal	1	A diagonal curb ramp is not provided where the accessible route crosses a curb.	CR6	ADA
109908	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Curb Ramp	1	The curb ramp does not meet the slope requirements.	CR1	ADA
109909	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Ramp	1	The ramp is required but not provided.	R9	ADA
109910	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Ramp	1	The handrails are not compliant.	R9	ADA
109911	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Curb Ramp	1	A curb ramp is not provided where the accessible route crosses a curb.	CR2	ADA
109912	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Ramp	1	The ramp is required but not provided.	R10	ADA
109913	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Ramp	1	The handrails are not compliant.	R10	ADA
109389	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Ramp	1	The handrails are not compliant.	R3	ADA
109391	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Ramp	1	The ramp is required but not provided.	R4	ADA
109914	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Exterior Accessible Route	1	The accessible route has areas of vertical level changes in excess of 1/4" that are not beveled or ramped.	Blacktop Play Area	ADA
109916	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Ramp	1	The ramp has openings in the surface greater than 1/2".	R2	ADA
109917	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Exterior Accessible Route	1	In areas along the route there are level changes of 1/2" or greater that are not ramped.	R2	ADA
109407	Dr Martin Luther King Middle School	INTERIOR	Interior Access Route	Protruding Object	1	Protruding objects in the 27" to 80" range above finished floor protrude more than 4" into the circulation path along the interior accessible route.	Gymnasium	ADA
109408	Dr Martin Luther King Middle School	INTERIOR	Basketball Court	Sport Court	1	An accessible route does not directly connect each side of the court outside of play lines.	Gymnasium	ADA
109942	Dr Martin Luther King Middle School	INTERIOR	Interior Access Route	Protruding Object	1	Protruding objects in the 27" to 80" range above finished floor protrude more than 4" into the circulation path along the interior accessible route.	Gym	ADA
110002	Dr Martin Luther King Middle School	INTERIOR	Interior Access Route	Protruding Object	1	Protruding objects in the 27" to 80" range above finished floor protrude more than 4" into the circulation path along the interior accessible route.	Near Locker Rooms	ADA
110011	Dr Martin Luther King Middle School	INTERIOR	Interior Access Route	Stairs	1	Handrails are not compliant.	STR4	ADA
110019	Dr Martin Luther King Middle School	INTERIOR	Interior Access Route	Protruding Object	1	Protruding objects in the 27" to 80" range above finished floor protrude more than 4" into the circulation path along the interior accessible route.	A Hallway	ADA
110023	Dr Martin Luther King Middle School	INTERIOR	Interior Access Route	Protruding Object	1	Protruding objects in the 27" to 80" range above finished floor protrude more than 4" into the circulation path along the interior accessible route.	Cafeteria	ADA
110025	Dr Martin Luther King Middle School	INTERIOR	Interior Access Route	Stairs	1	Handrails are not provided.	Stage	ADA
109369	Dr Martin Luther King Middle School	PARKING LOTS	Accessible Parking	Parking Space-Van	1	MARYLAND: Compliant signage is not provided at the space.	Parking Lot 1 - P1	State of Maryland
109370	Dr Martin Luther King Middle School	PARKING LOTS	Accessible Parking	Parking Space-Van	1	MARYLAND: Signage indicating "No Parking in Access Aisle" at van access aisle is not provided.	Parking Lot 1 - P1	State of Maryland
109371	Dr Martin Luther King Middle School	PARKING LOTS	Accessible Parking	Parking Space-Van	1	MARYLAND: The access aisle slope is greater than 1:50 (2%).	Parking Lot 1 - P1	State of Maryland

Id	Facility	Building	Assembly	Type	Barrier Priority	Detail	Location Description	ADA
109376	Dr Martin Luther King Middle School	PARKING LOTS	Accessible Parking	Parking Space-Car	1	MARYLAND: Compliant signage is not provided at the space.	Parking Lot 1 - P2-5	State of Maryland
109377	Dr Martin Luther King Middle School	PARKING LOTS	Accessible Parking	Parking Space-Car	1	The slope of the parking space is greater than 1:50 (2%).	Parking Lot 1 - P2	ADA
109378	Dr Martin Luther King Middle School	PARKING LOTS	Accessible Parking	Parking Space-Car	1	The slope of the parking space is greater than 1:50 (2%).	Parking Lot 1 - P4	ADA
109379	Dr Martin Luther King Middle School	PARKING LOTS	Accessible Parking	Parking Space-Car	1	The access aisle slope is greater than 1:50 (2%).	Parking Lot 1	ADA
109380	Dr Martin Luther King Middle School	PARKING LOTS	Accessible Parking	Parking Space-Car	1	The slope of the parking space is greater than 1:50 (2%).	Parking Lot 1 - P5	ADA
112013	Dr Martin Luther King Middle School	PARKING LOTS	Accessible Parking	Parking Spaces-General	1	MARYLAND: The minimum number of accessible parking spaces is not provided.	Parking Lot 3	State of Maryland
112014	Dr Martin Luther King Middle School	PARKING LOTS	Accessible Parking	Parking Space-Van	1	MARYLAND: A van access aisle is not provided.	Parking Lot 3	State of Maryland
112015	Dr Martin Luther King Middle School	PARKING LOTS	Accessible Parking	Parking Space-Van	1	MARYLAND: Compliant signage is not provided at the space.	Parking Lot 3	State of Maryland
112016	Dr Martin Luther King Middle School	PARKING LOTS	Accessible Parking	Parking Space-Van	1	MARYLAND: Signage indicating "No Parking in Access Aisle" at van access aisle is not provided.	Parking Lot 3	State of Maryland
112017	Dr Martin Luther King Middle School	PARKING LOTS	Accessible Parking	Parking Space-Car	1	MARYLAND: Compliant signage is not provided at the space.	Parking Lot 3	State of Maryland
112018	Dr Martin Luther King Middle School	PARKING LOTS	Accessible Parking	Parking Space-Car	1	An access aisle is not provided.	Parking Lot 3	ADA
109397	Dr Martin Luther King Middle School	ATHLETIC FIELDS	Baseball/Softball Field	Player Seating	2	A wheelchair space is not provided at each team bench area at the ball field.	Baseball Field 1 and 2	ADA
109399	Dr Martin Luther King Middle School	ATHLETIC FIELDS	Baseball/Softball Field	Lawn Seating	2	The lawn seating and exterior overflow seating areas, where fixed seating is not provided, do not connect to an accessible route.	Baseball Field 2	ADA
109393	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Gate	2	The swinging gate does not have a smooth surface within 10" of the ground measured vertically on the push side extending the full width of the gate.	Tennis Courts	ADA
109390	Dr Martin Luther King Middle School	EXTERIOR	Site Furnishings	Trash Receptacle Without Operable Lid	2	A trash receptacle is not located on an accessible route and within reach range.	Athletic Fields	ADA
110003	Dr Martin Luther King Middle School	INTERIOR	Common Areas	Work Surface	2	The work surface height is not compliant. Knee and toe clearances are not provided.	Room B112	ADA
110015	Dr Martin Luther King Middle School	INTERIOR	Interior Access Route	Elevator	2	No characters or numbers are present on the hoist ways.	EL1	ADA
110020	Dr Martin Luther King Middle School	INTERIOR	Common Areas	Service Counter	2	The service counter does not have 36" wide section that is 36" maximum above finished floor that is oriented for a parallel approach, or the service counter does not have a 30" wide section that is 36" maximum, with knee and toe clearance, that is oriented for a forward approach.	Media Center	ADA
110021	Dr Martin Luther King Middle School	INTERIOR	Common Areas	Vending Machine	2	The vending machines have operable parts which are not within reach range.	Cafeteria	ADA
110029	Dr Martin Luther King Middle School	INTERIOR	Common Areas	Vending Machine	2	The vending machines have operable parts which are not within reach range.	Hall	ADA
110030	Dr Martin Luther King Middle School	INTERIOR	Interior Access Route	Signage	2	Means of egress signage does not have tactile lettering.	All Exits	ADA
109915	Dr Martin Luther King Middle School	PLAYGROUND	Playground	Exterior Accessible Route	2	An accessible route within the play area has not been provided.	Black Top Play Area 1	ADA
110004	Dr Martin Luther King Middle School	RESTROOMS	Interior Access Route	Reach Range	2	At least one each of shelves, clothes rod, drawer, hook, closets or cabinets are not within reach range.	B112	ADA
110016	Dr Martin Luther King Middle School	INTERIOR	Interior Access Route	Elevator	3	A tactile, raised star minimum 2" high is not provided to the left of the floor designation on both jambs at the main elevator entry level.	EL1	ADA
109958	Dr Martin Luther King Middle School	RESTROOMS	Restroom	Restroom/Bathroom-Urinal	3	The urinal dimensions are not compliant.	D109	ADA

Id	Facility	Building	Assembly	Type	Barrier Priority	Detail	Location Description	ADA
109999	Dr Martin Luther King Middle School	RESTROOMS	Restroom	Restroom/Bathroom-Roll-In Shower Stall	3	The shower enclosure is not 30" minimum by 60" minimum.	D109	ADA
110000	Dr Martin Luther King Middle School	RESTROOMS	Restroom	Restroom/Bathroom-Water Closet	3	The water closet in a wheelchair stall in a multi-stall restroom does not have the required clearance.	D106	ADA
110001	Dr Martin Luther King Middle School	RESTROOMS	Restroom	Restroom/Bathroom-Coat Hook	3	The coat hook is not within an allowable reach range.	D109 and D106	ADA
110008	Dr Martin Luther King Middle School	RESTROOMS	Restroom	Restroom/Bathroom-Urinal	3	The urinal dimensions are not compliant.	B122, A218	ADA
110009	Dr Martin Luther King Middle School	RESTROOMS	Restroom	Restroom/Bathroom-Water Closet	3	The centerline of the toilet in the wheelchair stall is not 16" minimum to 18" maximum from the sidewall.	B122	ADA
110013	Dr Martin Luther King Middle School	RESTROOMS	Restroom	Restroom/Bathroom-Water Closet	3	The centerline of the toilet in the ambulatory stall is not 17" minimum to 19" maximum from the sidewall.	B221, A111	ADA
110022	Dr Martin Luther King Middle School	INTERIOR	Interior Access Route	Drinking Fountain/Water Cooler	4	A clear space is not positioned at the lower level drinking fountain for a forward approach and centered on the unit.	Cafeteria	ADA
109907	Dr Martin Luther King Middle School	EXTERIOR	Exterior Access Route	Curb Ramp	5	A landing at the top of the curb ramp is not present.	CR1	ADA
109406	Dr Martin Luther King Middle School	INTERIOR	Interior Access Route	Door	5	The bottom of the door vision light is higher than 43" and less than 66".	Main Office Area	ADA
109940	Dr Martin Luther King Middle School	INTERIOR	Interior Access Route	Door	5	The bottom of the door vision light is higher than 43" and less than 66".	108-115	ADA
110010	Dr Martin Luther King Middle School	INTERIOR	Interior Access Route	Sink	5	The sink rim is higher than 34", and does not have knee and toe clearance (does not apply to mop basins, utility sinks, or bar sinks).	Rooms B116, B115, B215, B216, A215, and A216	ADA
110024	Dr Martin Luther King Middle School	INTERIOR	Employee Work Areas	Locker Rooms	5	The locker room does not have accessible lockers.	Cafeteria Staff Room, C143	ADA
110026	Dr Martin Luther King Middle School	INTERIOR	Common Areas	Vending Machine	5	The vending machines have operable parts which are not within reach range.	C147	ADA
110027	Dr Martin Luther King Middle School	INTERIOR	Employee Work Areas	Locker Rooms-Bench	5	The locker room does not have a compliant bench.	Cafeteria Staff Area and C143	ADA
112009	Dr Martin Luther King Middle School	PARKING LOTS	Accessible Parking	Parking Spaces-General	5	MARYLAND: The minimum number of accessible parking spaces is not provided.	Parking Lot 2	State of Maryland
112010	Dr Martin Luther King Middle School	PARKING LOTS	Accessible Parking	Parking Space-Van	5	MARYLAND: A van access aisle is not provided.	Parking Lot 2	State of Maryland
112011	Dr Martin Luther King Middle School	PARKING LOTS	Accessible Parking	Parking Space-Van	5	MARYLAND: Compliant signage is not provided at the space.	Parking Lot 2	State of Maryland
112012	Dr Martin Luther King Middle School	PARKING LOTS	Accessible Parking	Parking Space-Van	5	MARYLAND: Signage indicating "No Parking in Access Aisle" at van access aisle is not provided.	Parking Lot 2	State of Maryland
109402	Dr Martin Luther King Middle School	RESTROOMS	Restroom	Restroom/Bathroom-Water Closet	5	The water closet in a single/user or unisex restroom does not have the required clearance.	C120 and C121	ADA
109403	Dr Martin Luther King Middle School	RESTROOMS	Restroom	Restroom/Bathroom-Lavatory	5	Pipes are not insulated.	C120 and C1221	ADA
109404	Dr Martin Luther King Middle School	RESTROOMS	Restroom	Restroom/Bathroom-Water Closet	5	The centerline of the toilet in the ambulatory stall is not 17" minimum to 19" maximum from the sidewall.	C120 and C121	ADA
109950	Dr Martin Luther King Middle School	RESTROOMS	Restroom	Restroom/Bathroom-Transfer Shower Stall	5	The transfer shower is not compliant.	D108 and D107	ADA
109951	Dr Martin Luther King Middle School	RESTROOMS	Restroom	Restroom/Bathroom-Transfer Shower Stall	5	The curb is more than 1/2" high.	D108 and D107	ADA
109953	Dr Martin Luther King Middle School	RESTROOMS	Restroom	Restroom/Bathroom-Coat Hook	5	The coat hook is not within an allowable reach range.	D108 and D107	ADA
109954	Dr Martin Luther King Middle School	RESTROOMS	Employee Work Areas	Locker Rooms	5	The locker room does not have accessible lockers.	D108 and D107	ADA
110005	Dr Martin Luther King Middle School	RESTROOMS	Restroom	Restroom/Bathroom-Water Closet	5	The water closet in a single/user or unisex restroom does not have the required clearance.	Cafeteria Staff, A124, A125, A223, B117, C145 and B217	ADA

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110014	Dr Martin Luther King Middle School	RESTROOMS	Restroom	Restroom/Bathroom-Water Closet	5	The centerline of the toilet in the ambulatory stall is not 17" minimum to 19" maximum from the sidewall.	B222	ADA
110017	Dr Martin Luther King Middle School	RESTROOMS	Restroom	Restroom/Bathroom-Lavatory	5	Pipes are not insulated.	A223, B117 and B227	ADA
110018	Dr Martin Luther King Middle School	RESTROOMS	Restroom	Restroom/Bathroom-Coat Hook	5	The coat hook is not within an allowable reach range.	A125, A124, A223, B117 and B217	ADA
110028	Dr Martin Luther King Middle School	RESTROOMS	Restroom	Restroom/Bathroom-Transfer Shower Stall	5	The transfer shower is not exactly 36" by 36".	C145	ADA
110006	Dr Martin Luther King Middle School	RESTROOMS	Restroom	Restroom/Bathroom-Water Closet	5	The rear grab bar at the water closet is not compliant.	Cafeteria Staff, A125, A124, A223, B117 and B217	ADA
110007	Dr Martin Luther King Middle School	RESTROOMS	Restroom	Restroom/Bathroom-Water Closet	5	The grab bars at the water closet are not compliant.	Cafeteria Staff, A124, A125, B117 and B217	ADA
110012	Dr Martin Luther King Middle School	RESTROOMS	Restroom	Restroom/Bathroom-Lavatory	5	Pipes are not insulated.	B221, A218	ADA