

10-01 – 2021 Public Comment 1

106.2, 1008.4.1.3.1

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Further revise as follows:

106.2 Documents.

106.2.12 Standard Specification for Impact Attenuation of Surfacing Materials Within the Use Zone of Playground Equipment. ASTM F 1292-~~13~~ 18e1(ASTM International, 100 Barr Harbor Drive, PO Box C700, West Conshohocken, PA, 19428-2959).

106.2.14 Standard Specification for Determination of Accessibility of Surface Systems Under and Around Playground Equipment. ASTM F 1951-21(ASTM International, 100 Barr Harbor Drive, PO Box C700, West Conshohocken, PA, 19428-2959).

SECTION 1008 PLAY AREAS

1008.4.1.3 Ground surfaces. Ground surfaces on accessible routes, clear floor spaces, and turning spaces shall comply with Section 1008.4.1.3.

1008.4.1.3.1 Surface condition. Ground surfaces shall be stable, firm and slip resistant. Ground surfaces shall be inspected and maintained regularly and frequently to ensure continued compliance with this requirement. ~~Artificial turf on the accessible route shall comply with Section 302.2.~~ Ground surfaces shall comply with ASTM F 1951 listed in Section 106.2.14.

1008.4.1.3.2 Use zones. Ground surfaces located within use zones shall comply with ASTM F 1292 listed in Section 106.2.12.

REASON: The ASTM F1951 Standard Specification for Determination of Accessibility of Surface Systems Under and Around Playground Equipment was updated in 2021 to include the technical provisions consistent with the 2010 Standards for Accessible Design. The updated F1951-21 standard includes technical provisions for the accessible route including slope, cross slope, openings, and changes in level. Commonly referenced as the “wheelchair work method,” the F1951-21 standard also requires in Section 5.5 that “The test used to determine accessibility of materials specified for use in a playground shall have been conducted no more than five years prior to the date of installation of the playground surface.” As a best practice, playground owners are encouraged to collect documentation of performance from playground surface manufacturers during the bid process. It is hoped that these updates to F1951-21 will eliminate

misinterpretation of the standard and misuse of the test method while setting performance criteria for playground surfaces that are more accessible to people with disabilities.

As the task group chair to F1951-21, I would request that the ANSI A117.1 committee consider updating the playground surface condition requirement such that it is consistent with the 2010 ADA Standards for Accessible Design and reference the newer 2021 ASTM F1951 standard.

For some further explanation -

1951 is the wheelchair work method test that applies to the accessible route (which may include the use zone) The accessible route is only required to the accessible play components – to the points of entry and egress. So if there are 3 swings, the accessible route only has to go to one swing.

1292 is the “head drop test” for impact attenuation – it only applies to the use zone. 1292 has to apply under all 3 swings