

The California School Playground

David Spease, ASLA, CPSI

The California Division of the State Architect, Advisory Board, Access Committee yesterday voted to approve two motions and send them to the State Architect. The first motion is to develop guidelines and standards to control what materials are considered accessible ground surface materials in play areas and access routes and the second is to make playground structures more accessible. The Division of the State Architect is responsible for all construction on state owned or controlled properties. Their primary interest in this case is School Playgrounds. Their rules do not apply to parks or other public spaces except that once something becomes the standard policy for schools, other agencies tend to adopt similar actions.

This Access Committee is a reorganization of a previous Universal Access Committee that unsuccessfully tried to eliminate the use of Engineered Wood Fiber in school playgrounds in 2005. In the final decision the Division of the State Architect determined that specific products deemed to be accessible products and compliant with ASTM and CPSC can not be restricted from use on school sites

The final evaluation also stated “Until specific requirements are adopted by the US Department of Justice and incorporated into the State Building Standards Code, DSA/AC will not take issue with playground plans which have been developed consistent with the accessibility guidelines for the Play Setting Subcommittee issued by the Access Board.”

This new Access Committee has resubmitted both of these items and the motions were carried. The proposals will be forwarded to the State Architect Advisory Board for evaluation. A specific schedule is not known at this time but the last time we went through this process it took about two years. I will be monitoring all DSA announcements and attending all future committee meetings. I will post updates as they become available on my web page at www.spease.com

Notice for this meeting was very short and preliminary reports to define the proposals were not provided in advance; but there was great interest generated in a short time. Representatives from Fibar Inc. and Zeager Recreational Surfacing were represented on a telephone link. Local representatives included The Executive Director the Mission Oaks Recreation and Parks Department, the local BCI Burke Representative and Safeplay by Design, Inc.

The specific proposals are to restrict the use of Engineered Wood Fiber in playgrounds and access routes on Schools. They do not agree that Engineered Wood fiber is an accessible surfacing material. When asked about other loose fill materials such as loose fill rubber products they indicated that they don't want any loose fill surfacing materials. When we asked why they don't think loose fill materials are accessible surface materials

the reason given is that these products are not maintained properly. It was brought up that perhaps the committee should explore ways to assure better maintenance or to require annual inspections with a device such as the Rotational Penetrometer to verify that the materials continued to be compliant. The response was that the codes address construction not maintenance and that maintenance requirements were too expensive and difficult to administer.

The proposal for playground composite structures is to modify the Access Board Accessibility Guidelines requirement for access ramps on play structures when the number of play components reaches 20. The Access Committee wants to require the use of access ramps when the play area has 11 or more play components.

The requirement to use ramps on composite structures has two major drawbacks. Ramps require a school to dedicate much more real estate to play areas which is very difficult to find in inner-city sites and expensive if it is available. The second factor is that much of the play area budget would go to the construction of ramps rather than to provide play experiences. The added cost of requiring Poured in Place surfacing and ramps will seriously restrict the amount of play areas available for students or force schools to eliminate play equipment from their budget. If a district can afford these improvements they may have value but they should be recommendations not requirements. I recently inspected an Elementary School play area that consisted of one four foot high dome climber with poured in place surfacing. That was the only play equipment the school had for its 450 students ranging from kindergarten through 5th grade. I would hate to see this become the normal playground in California Schools.

In this time of budget reductions and student obesity, I hate to see this kind of regulation proposed. Schools have a hard time providing for books and other student supplies and programs. Safety and access are always major concerns but we need to find ways to help the schools provide the opportunities for the children they need without raising the cost to the point that schools are forced give up programs and facilities.