

Formal Interpretation 98-1

accessible seating: motion picture lines of sight

By: Jerry W. Jones, Deputy Assistant Secretary/Chief Architect
Approved by: V.J. Bella, State Fire Marshal

Re: Stadium Style Theaters: seating for disabled individuals

Question: In an auditorium with a "stadium style" seating arrangement where the entrance to the auditorium or theater is at the lower floor level, is it the intent of the Americans With Disabilities Act Accessibility Guidelines to allow the grouping of handicapped seating at a single location on the entry floor level of the auditorium or theater?

Background: A "stadium style" auditorium or theater is composed of a series of steps, like a sports arena or stadium. Like a stadium, a row of seats is placed on each step all the way to the back (top) of the auditorium. The stadium style theater auditorium differs from the traditional "incline" auditorium or theater in that the entrance is at or near the front of the auditorium, rather than the rear. In most cases the entrance is at or near the bottom of the steps. The advantage to such a stepped arrangement is that theater patrons have relatively unobstructed views because the people sitting in the row in front are on a lower level. Because of the stepped arrangement, a mobility impaired disabled patron cannot climb the steps and are therefore relegated to seating at the entrance level. Due to the closeness of the screen, these entrance level seats are typically the worst seats in the house. In many cases the viewing angle of the screen from the level of the entrance is awkward and uncomfortable because it is too close to the screen and too far below its comfort level.

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Section 4.33.3 of the ADAAG addresses this issue. This section reads:

Wheelchair areas shall be an integral part of any fixed seating plan and shall be provided so as to provide people with disabilities a choice of admission prices and lines of sight comparable to those for members of the general public.

Some might argue the ADAAG allows such an arrangement due to the allowance of this section to group wheelchair areas in auditoriums with less than 300 seats. The issue is not the grouping together of wheelchair seats at a single location in a theater or auditorium, the issue is the requirement for "lines of sight comparable to those for members of the general public". Do these grouped seats at the entry level of the auditorium or theater with stepped aisles and seating platforms provide disabled individuals with comparable sight lines?

Determination: Section 4.33.3 of the ADAAG requires disabled individuals to be provided with comparable lines of sight at least similar to those afforded to the average patron. Relegating disabled individuals to "the worst seat in the house" does not afford these individuals with comparable lines of sight and is therefore not allowed pursuant to section 4.33.3 of the ADAAG. Therefore, be advised that wheelchair seating in auditoriums and theaters with fixed seating shall afford disabled patrons with lines of sight comparable to those afforded to the average patron. Lines of sight for disabled patrons shall not be above thirty-five degrees which requires person seated in the "wheelchair row" to lift his or her eyes and/or crane his or her neck at a very uncomfortable level to see the screen. Wheelchair seating locations shall be such that the viewing angles are within the comfort levels as described by engineering guidelines such as those established by the Society of Motion Picture and Television Engineers as the SMTE ENGINEERING GUIDELINE EG-18-1994 or those found in the Architectural Graphics Standard. Designers of "stadium style" motion picture theaters must be prepared to demonstrate compliance with these sight line requirements.

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