



2013
**WOMEN
IN COMMERCIAL
CONSTRUCTION
& FACILITIES**

Looking UP

Roundtable yields plans, challenges and promises ahead

The to-do lists are big – and growing. That was the general consensus from the executives attending the 2013 Women’s Commercial Construction & Renovation Retreat in Washington, D.C. in August.

Meeting and exceeding deadlines, keeping up with technology, building partnerships and understanding ADA are all part of the big picture moving forward, as executives from some of the industry’s leading companies helped paint a picture of doing business in today’s commercial construction landscape.

The general consensus shows that the commercial construction continues to pull itself up from the ashes of an economy that left many scars over the past few years. The executives on hand were part of our annual Women’s Retreat, held at historic Hotel Monaco. Commercial Construction & Renovation sponsored the event.

Following is the first installment of our Women’s Retreat coverage, including a look at our Friday morning open forum. For more coverage, visit us online at www.ccr-mag.com.



Sue Burke
 Director, Project Mgmt,
 Architecture & Construction,
 The Americas
 Hilton Worldwide



Lisa Carbone
 Special Projects Manager
 Boss Facility Services



Diana Dietz
 COO
 LazerCad LLC



Jennifer Ferris
 President
 Federated Service
 Solutions



Susan Foster-Goodman
 National Accounts
 Parex USA



Lynnette Gannaway
 Director of Business
 Development
 Choice Hotels



Melanee Jech
 Exec Vice President
 Icon Identity Solutions



Debby Kasmir
 Director of Facilities
 Total Wine & More



Sherene Kutach
 Remodel Coordinator
 Francesca's Collections



Jacqui Lee
 Senior Manager
 Cassidy Turley



Haylee Linduff
 Estimator
 P&C Construction



Karen MacCannell
 Business Development
 The McIntosh Group



Amanda Petter
 Construction Manager
 Francesca's Collections



Amy Ralph
 Senior Designer
 BCBG



Beth-Ann Rosenbluth
 Director of Marketing
 Sargenti Architects



Lu Sacharski
 Director of Project Mgmt
 Chatham Lodging & Trust



Bibi Sukey
 Construction Project
 Manager
 H&M



Julie Thomas
 Director of Facilities
 Coldwater Creek



Kim Whalen
 Executive Vice President
 Heart of
 America Group



Cindy Young
 Development
 Program Manager
 ULTA



Amanda Thevenot
 Designer
 BCBG



Heidi Vassalotti
 LEED AP ID+C
 Crossville

CCR: What's the most pressing item on your to-do list?

Amanda Petter, Francesca's Collections: We're at the end of our build season. We plan to open about 80 to 85 stores. There are four of us who actually do all the new stores, so it's all about time management, making sure everybody's on the schedule, getting all the GCs ready to go [etc.]. We're going through a rebranding, updating all the current locations and changing to the new concept.

Beth-Ann Rosenbluth, Sargenti Architects: We're expanding our office divisions because we have so many national clients. We plan to do more office; restaurants and multifamily projects, so expanding our base will help with this.

Bibi Sukey, H&M: All of our building construction is bunched during the autumn and fall period. So, we get our construction documentation done from May to the beginning of August. We have four MSA architects that do the West Coast alone. Our stores are anywhere from 18,000 to 30,000 square feet – multi-level and single-level structures.

[Right now] we're implementing a lean construction method, which means we get our contractors and they're subcontractors in one room and organically create a project schedule. They create a schedule they can agree to, and then find ways to make the construction effort more efficient. Construction hasn't changed for the past probably 20 to 30 years. Everybody is building the same way, layer after layer. We're trying to find ways to reduce the hand-off, and then reduce the punch items to turn over a clean store for merchant-

dizing. We have found that a project that was planned for 12 weeks can get done in 10. But everybody has to buy into this.

Can we get the staff in time, recruit enough people for support and find the building materials our designers want. With products procured from all over the world, metal products from Asia, carpet from Persia, tile from Italy [etc.], we just have to hope they make it through custom on time for installation. There are a lot of different segments that can have a domino effect.

Kim Whalen, Heart of America Group:

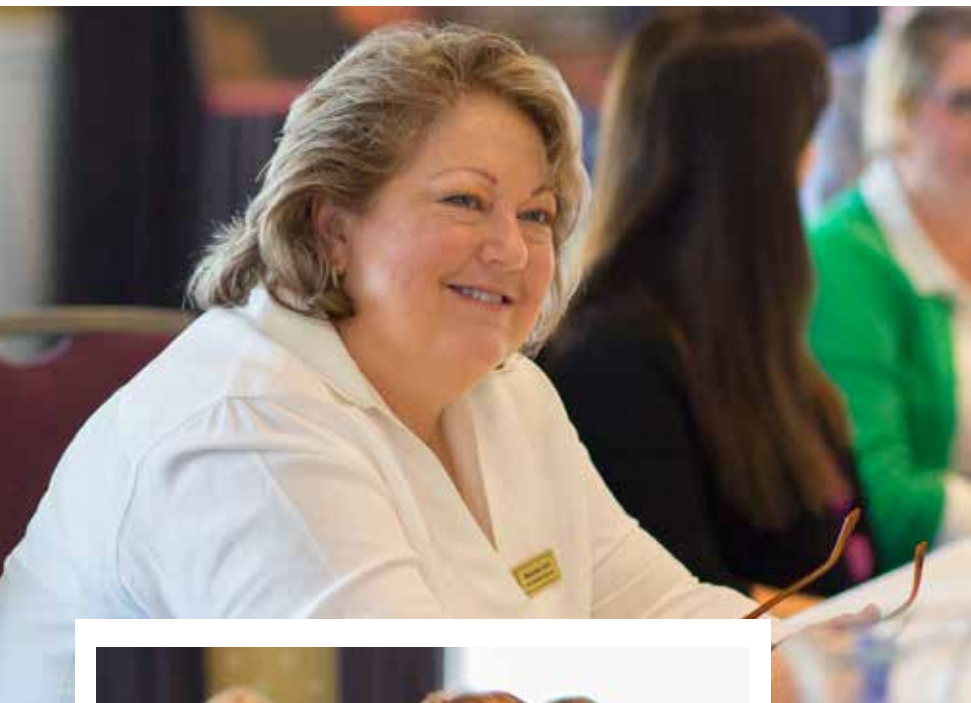
We're in a firestorm right now. Over the past year, we've franchised one of our restaurant concepts, which will open soon. So, we're learning how to support a franchise, which we've devoted a lot of time and energy to. We have several more in the works. We do all of the architectural for them, so we are doing a design for these restaurants, which are in hotels.

We also [opened] our own hotel [in September] and have a 14-acre retail site we're building, so we're working on those, too. It's definitely a firestorm every day.

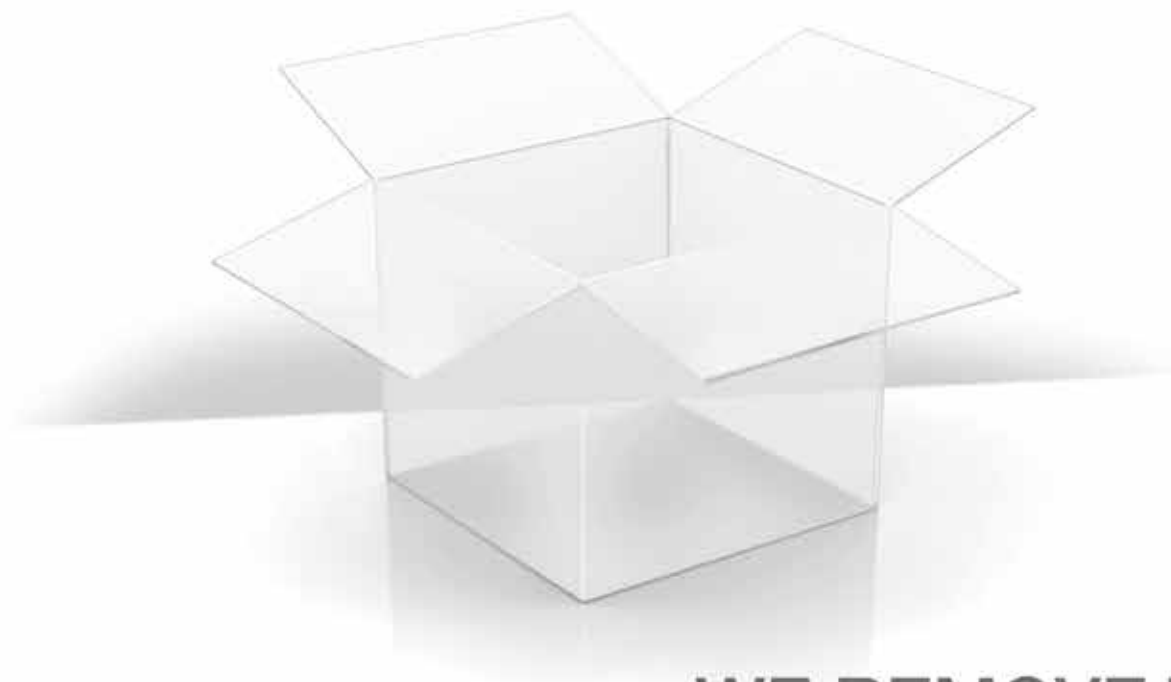
We build, own and operate, but the retail development is our first – delivering each unit to a retailer in a different base. Our in-house architects are very busy right now.

Amy Ralph, BCBG: We've been working on our shop-in-shop concept, working with the design to see it all fits into the different department stores. Bloomingdale has a different set of criteria than Macy's or Gordon Taylor does. We've been working on fixture packages. We also have a refresh model we're working on for our older stores. We are working to identify which stores had which concept.

Heidi Vassalotti, Crossville: I'm hearing a recurring theme about compressed construction schedules, something we are very familiar with. As a domestic manufacturer, we're comfortable with that sort of



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scenario. I get a phone call on a Tuesday from Starbucks saying they need tile on Thursday in Chicago. No problem. That's our greatest strength – having the flexibility to do that.

The compressed construction schedule in the world of standard tile isn't really an area of concern for us. The shift has taken place in the world of porcelain, which has changed quite a bit. It's moving more into a solution-oriented environment, where there new solutions like antimicrobial solutions are being applied to porcelain tile. In case you haven't noticed, tile is getting bigger.

Sukey: Yes, your floor preparation has to be perfect.

Plan C. You have to keep it going. I have seven other projects going at the same time, so I am always traveling. What used to be three projects in a two-day time frame is now turning into a four- or five-day time frame. And the weather has delayed everything.

Julie Thomas, Coldwater Creek: We are refreshing some of our older stores, which you need to do. With some of the larger stores, we're downsizing. We're also splitting locations. And we always have projects where we're trying to retrofit the stores with the LED lighting. We're always trying to cut costs, so I try to find those self-performing contractors in whatever for each area where stores are located.

“I’m hearing a recurring theme about compressed construction schedules, something we are very familiar with. As a domestic manufacturer, we’re comfortable with that sort of scenario.”

– Heidi Vassalotti, Crossville Inc.



Vassalotti: Yes. It's that sort of a challenge. We have to educate the market on how to install these types of products – what are the proper applications?

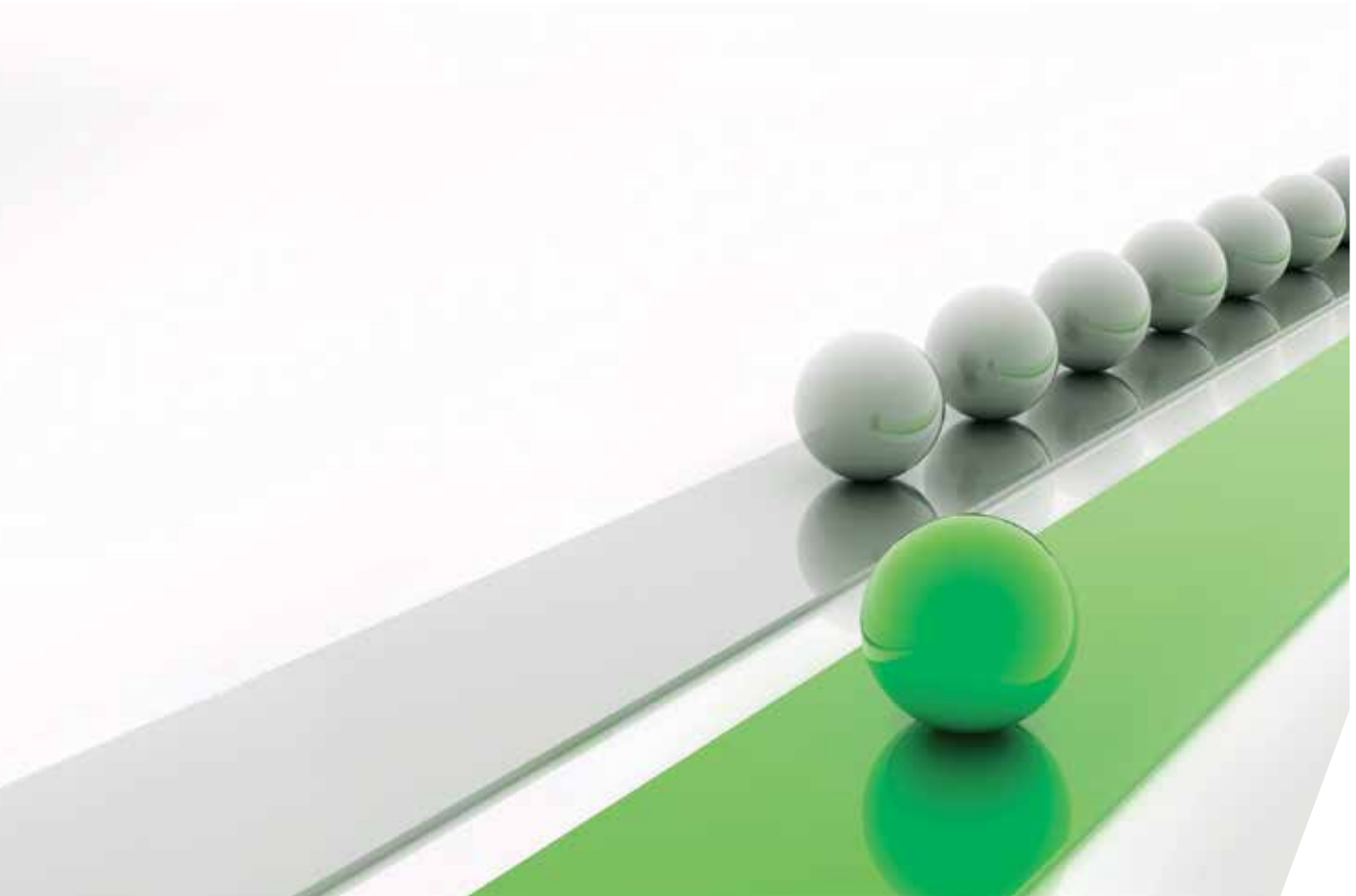
Lu Sacharski, Chatham Lodging & Trust: For us, one of the challenges we have right now is working in an area like [Washington] D.C. Permitting. Getting things in on time. Time frames. Rain. Unloading in a small footprint and the hotel has to stay open so they can get deliveries. I have a renovation going on right now. I need my deliveries. And the lack of storage is a problem.

The other thing is supply and demand, which is coming full circle right here. I'm placing orders and getting ready to sign off on a project signing next January on the East Coast. So you have to plan ahead. I'm always two months out. You have to have a Plan B and a

Lisa Carbone, Boss Facility Services: Our company just went through a software upgrade, so now it integrates with a lot of our clients' software. They talk to each other because communication is key to making sure we meet deliverables. If we can speak directly to our clients' software they can get their updates quicker. They can log into our system to check on a project status 24/7. We're constantly updating our systems. We found that software implementation has been a key component in building trust with our clients.

We are coming down through our construction phase with our retailers. They're [done] with back to school and the holidays are coming up, so we're working with them on remodels and refreshes. Some retailers relocated spaces temporarily, so we're moving them back now, as they gear up for the holidays.

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The demands have been challenging — working with malls, permitting, union malls, making sure the contractors are meeting their time schedules. Retailers can't miss any of their sell time.

For our on demand service we're just reactive maintenance. Whatever is needed we provide. It's 24/7. We're there for them. The stores can contact us directly through their systems. The phone calls are less, but the updates are constant and frequent.

Sue Burke, Hilton Worldwide: In our architecture and construction divisions, we are on a push right now for ROI projects — LED lighting conversions, water source conversions. My most pressing project is a 460-room renovation at Fess Parker's Doubletree Resort in Santa Barbara [Calif.]. Along with that renovation, not only are we changing all soft and case goods, but we're also going to repipe the hot water piping. This will be in a fully occupied hotel. It's a challenge. but we have it figured out. We're going to run pipes side by side, and then do cutovers as we release space.

“We've been working on our shop-in-shop concept, working with the design to see it all fits into the different department stores.”

— Amy Ralph, CCBG



On top of that is our scheduled compression. All of the hotels we're working on are occupied spaces. We don't shut down any hotels to do any renovations, whether we're doing guest rooms, public restrooms, restaurants, ballroom space [etc.]. We could have meetings going on next door like this one, and we could be hanging wallpaper and carpet at the same time. It's a lot of scheduled coordination with the hotels, which want it done yesterday.

I have to work very diligently, not only with the hotel operations side, but also with all my contractors and subcontractors. We can't have noise.

CCR: How does it work with guests and groups? Is it a seamless operation?

Burke: Yes. You have to work very hard, but it's seamless. When we started the renovation at Fess Parker, there were eight different buildings, so we could take a whole building at a time. We take the third floor and second floor, and occupy the first floor for five days with a buffer in between. Once we get done with the second floor, the floor is emptied. If it's a high-rise, we have the luxury of taking off a floor at a time. So it's doable. It's a lot of preplanning. We have learned that it is better to pre-warn the guests so they know what they are in for.

Jacqui Lee, Cassidy Turley: Back to school and the beginning of the year are the biggest times a year, so we're condensing construction as much as possible to try and hit these store opening dates. We're already looking to 2014 and planning out what stores will open when. The majority of the stores — we do 40 in a year open-in January, February and March just to get those sales. That turns out to be about 25 stores. We're getting site surveys ordered, getting designs done and getting bids from general contractors and architects. Come January, we have these stores built out in December, and then have a month to breathe before we have to turn them back over to our clients.

Amanda Thevenot, CCBG: Our shops are kind of a major priority for us, making sure they're designed consistently with our retail experience. We want a customer who goes into a shop-in-shop at Bloomingdale's, for example, to get the same experience and same feeling they get when they walk into one of our flagship retail stores.

We're also doing a lot of international work, making sure we design everything in house [etc.]. We're always making sure materials are consistent, and that the look and feel, and quality is consistent.

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“Our company has grown tremendously the past two years. It’s amazing how many people need good data.”

– Diana Dietz, LaZerCad



Cindy Young, ULTA: Being with a high gross retailer, the challenge is to keep everybody’s eyes on the big picture. We have more than 60 stores in some phase of construction, whether it’s a new store, a remodel or a relocation that must be done before the end of the season – Thanksgiving. At the same time, I have another 80-plus stores that are in some stage of preconstruction. They are scheduled to open in ‘14, ‘15 or ‘16. We’re already starting to plan these.

We’re trying to keep construction focused on projects that haven’t started, yet we have all these projects to finish. I have real estate teams looking for new projects, but I need them to finish the deals that already have been approved. I try to keep everybody working together so that we can keep the ball rolling.

Diana Dietz, LaZerCAD: It is kind of twofold. Our company has grown tremendously the past two years. It’s amazing how many people need good data. Our challenge and focus has really been to drive the technology that’s going to enhance the accessibility to that data.

We have found the value in shortening construction time. We originally started having about a two- to three-day turnaround from



when you got your data in the field, and that was usually delivered to your FTP site or whatever database you had.

Ours is cloud-based, so it’s changed things. Take a 7-Eleven. They now utilize the technology to do their sidewalks, so it’s enhanced their ability to see their sites on an iPad live. We’re continuing to build the technology that’s going to add that value.

Sukey: The quality you get is always wrong, and it’s hard to survey. You always have surprises when you make promises. There’s always ceiling tiles and overhead problems. Why don’t they use services like yours to update their as-built?

Dietz: We have a lot of real estate companies interested in the technology. But there tends to be a little bit more push back because there’s a lot of red tape when it comes to malls. I think they’re behind the times, so they get reluctant.

Sukey: Some of the challenge we go through with our planning is that you don’t get accurate drawings.

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Dietz: It's tough. Finding as-built companies that can do large spaces in a timely fashion is tough. We're one of many as-built companies, and everyone has different turnaround times. We pride ourselves on being able to deliver within 48 hours. I'm sure a lot of companies will start developing technology to support that turnaround as well. I think you'll see more malls and different retailers utilizing that survey.

Sukey: We have attempted to hire a professional surveyor in addition to our architects' normal service. But we find they still run into the same problem. You kind of rely on the engineer of the mall to answer some questions, but so far it hasn't been very efficient.

Dietz: Our technology is to have the surveyor go directly to CAD, which tends to make a difference.

“We’re trying to keep construction focused on projects that haven’t started, yet we have all these projects to finish. ... I try to keep everybody working together so that we can keep the ball rolling.”

– Cindy Young, ULTA



Jennifer Ferris, Federated Service Solutions:

One of my biggest challenges has been growing our customer base, which has actually grown really significantly over the last two years. I've changed my focus to going out and meeting people. It's hard to differentiate yourself when there are so many smaller companies. We're not IBM. If we compete against IBM at a table we just blow them out of the water. We specialize; it's all we do.

When we do get in the door, it's great. The challenge is crossing that line and making that communication – making people understand how we can help them. We can give them the software they need to see all of their photos on a site. We don't have cabling problems. Every store is different. You don't know what to do when you have a problem or an upgrade.

Tomorrow we could be installing holographic greeters. It is a very crazy, neat



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“We’re already looking to 2014 and planning out what stores will open when. . . . We’re getting site surveys ordered, getting designs done and getting bids from general contractors and architects.”

— Jacqui Lee, Cassidy Turley

industry. But that’s my biggest challenge and focus. Just learning how to cross that line.

Susan Foster-Goodman, Parex USA: I think the theme remains with time management. It’s about helping my team and prioritizing the demands that we have. We are moving to a new electronic system because we have more than 2,000 active projects today, which we are managing through all of your cycles.

You need certain things during certain phases of the design process, and then as you get down the pipeline you might have to change everything. We’re trying to manage all that data while the company over the last 10 years has grown by merger and acquisition.

We have six brands in different niches of specialty building materials, so trying to manage that information and make sure we’re providing effective integrated solutions for the builds along the way. We want to keep the teams in sync. We pride ourselves on having so much to offer that we really can be flexible and adaptable.

Debby Kasmir, Total Wine & More: We will have 103 stores at the end of this year. Last year our big project was implementing software to manage all of our facilities repairs, scheduled maintenance — things like that. I have a very lean staff. I have one person with two and a half years of experience that manages all of my facilities work and someone right out of college who works for him. Over the past year, I took over supplies procurement, so I’m the one who supplies toilet paper, paper towels [etc.]. I have revamped that to implement

a fairly robust procurement program with a large supplier and we’re starting to see some cost savings there.

At the same time, we have a refresh program that I’m just finishing up with 10 to 11 stores. We also have a corporate relocation program, which will double the size of our offices. I’m working with architects and engineers that will be relocating to our data center. There are a whole host of challenges, coupled with the day-to-day retail.

I teach. We spend money on education for our people. We want to make that investment because we don’t want them to leave.

Melanee Jech, Icon Identity Solutions: One of the challenges we think about is staying in front of the technology. There has been a big challenge with rebates and the LED technology. We want to make sure we’re offering the ROIs because rebates change every single day. An energy company can offer a rebate that starts at midnight tonight and by 12:31 the \$15 million they had in rebates are already accounted for. It goes really fast, so you have to stay in front of it.

The other thing is visibility. We brand spaces, and often times, the branding is the last thing before merchandising, and so time gets crunched a little bit.

We kind of laugh about that fact that you can’t push a wet noodle; you have to pull it.

They talk about the glass being half full, but when you’re looking at it from a half empty perspective, you have to figure out what to do to fix it.



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“A big part of what we’re doing right now is making sure we are meeting our clients’ time frames. . . . We want to make sure we have the labor to do that and get everything set up, in line and ready to go.”

– Haylee Linduff, P&C Construction

Lynnette Gannaway, Choice Hotels: We have a lot of exciting things going on right now. We recently announced a large incentive program for our franchisee base, specifically in the Comfort family of brands. One of my biggest challenges is to make sure our vendors are ready to support our franchisees as they begin to take advantage of this incentive program. We have to make sure we have vendors that truly can support hotels in all 50 states, and do so with good return on investment.

That’s a unique challenge. It takes a lot of support because there are lots of individual franchisees out there and they don’t know which vendors they are going to choose to use in the mix of our packages.

Right now our brands team is working through the people who have applied for this incentive program. They are doing the profit improvement plans, while I work on the back side with the vendors to make sure that we have the right mix.

For our Sleep In brand, we’re a couple years out from having issued a new prototype. Our design team recently went out to visit with our franchisees that have built those buildings. We’re going back to those prototypical plans to make some adjustments based on the franchisee comments.

Haylee Linduff, P&C Construction: We do pretty much every type of construction, from remodels to scrape and rebuilds, new

construction and tenant build-outs. We can certainly feel the shrink in the construction time frame. The majority of the work is with repeat clients. We build great relationships with our clients.

A big part of what we’re doing right now is making sure we are meeting our clients’ time frames. With the different industries that we work in, these can be anywhere from a year- to two-year projects. If it’s a weekend, you can work from from when the store closes till 5 a.m. Everything must be cleaned and ready for the open of business again.

On the projects we used to get five weeks for, we might now get seven days. We want to make sure we have the labor to do that and get everything set up, in line and ready to go.

We have a lot of different projects going at one time and all over the country, so we have to make sure our subs are ready. Everything has to be on the same page.

Sherene Kutach, Francesca’s Collections: For our construction department, one of the biggest challenges we’re working with is finding the right vendors. There are four new construction managers and there’s one of me, so finding the right sign companies that can think of something before we do is good. We have an amazing flooring company that does that. Finding those perfect vendors help make our job a little easier. We don’t have to have a team of 20.

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For me, there's that ongoing theme of the small time frame. We usually have five to six weeks to build out. This year we started doing remodels, where we basically conducted a demo of the entire store.

When we do fixtures, we put new ones into the remodels. I've seen it done in a day. This is the kind of thing that helps keep the stress level down. During the entire construction process you have to trust that your contractors are telling you the right thing. If you don't, you get managers freaking out because they don't know the construction process. It helps keep everything calm.

We're trying to do it during the week, so we're getting two weekends of sales back in and they get this beautiful new store. They're remerchandising in a day, so we have to make sure the tile and flooring is there in enough time. If not, it can set

“We have six brands in different niches of specialty building materials. ... We want to keep the teams in sync. We pride ourselves on having so much to offer that we really can be flexible and adaptable.”

— Susan Foster-Goodman, Parex USA



back construction a day, which can set back sales a day.

It's really complicated when the stores are already open with all remodels. That's my challenge. I have to make sure everything falls into line perfectly. I don't want to get a call that a chandelier isn't there. If I do, I'm driving to Austin [Texas] overnight to get one.

And we just started doing ADA stuff. That was put into the remodels, too.

CCR: Let's talk ADA. How is it impacting what you do?

Karen MacCannell, McIntosh Group:

One of the biggest things we are doing right now is educating people about the Americans with Disabilities Act (ADA). It's something that was passed almost 20 years ago, and yet we have people in our industry saying, “Oh my God, where did this come from?”

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CIRCLE NO. 28

My boss is a national expert on the topic, so we get him to work with retailers and architectural firms. We educated retailers and peers, and make sure everyone has what they need. It has been kind very hard. It's not revenue generating, so it's hard for people to justify the cost even though it is the right thing to do.

It's not a building code. It's a civil rights law. People forget that. They think because they have a permit, they are fine. Two states actually mandate ADA – California and Texas. In the others, a building permit has nothing to do with ADA.

Another challenge is that we are moving into new technology. We moved into Revit so that we could meet the needs of our clients.

Sacharski: How are you handling the new law that went into effect in March about service animals? One aspect of the law in particular is that it doesn't only recognize dogs, but miniature horses, too, which have been approved as service animals.



“All of the hotels we’re working on are occupied spaces. We don’t shut down any hotels to do any renovations.”

– Sue Burke, Hilton Worldwide



MacCannell: It is a law. In the past, the traditional animals have always been the seeing-eye dogs. The law is no longer just for seeing-eye dogs. It's for a service animal. There's a big controversy right now with comfort animals. A lot of returning servicemen have PTSD, and animals are very calming for anxiety. A comfort dog is not allowed into restaurants. But if the dog or animal – pony, miniature horse, etc. – provides a service, they cannot be denied into your place of business, even if it's a restaurant.

It goes against health codes. The owner is completely responsible or cleaning up any messes. We actually started a website called, AskBrad.info. He is one of our consultants.

You can visit the site or send an email about ADA questions.

I received one the other day that was interesting. It was from a woman who is a caregiver for her niece. Her niece has a service animal, which she brought to see her eye doctors. Turns out that her eye doctor is afraid of dogs. The doctor ended up denying that she could bring the dog with her. It's not our expertise, but it is an interesting scenario that will play out.



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It's all a part of the educational process. You have to educate your staff, your customers, your operations people [etc.]. People have to know how to defuse the situation. There's no governing factor. It is all lawsuit-driven.

CCR: Are there any stipulations on the size of a dog?

MacCannell: Most of your miniature horses supposedly are smaller than a typical service animal, which typically is a German shepherd. But that's changing. If you have a blind person that has a traveling companion, you cannot talk to the companion. You must speak to the blind person, who must give you permission to talk to the traveling companion.

Sacharski: We must train, train, train, and educate, educate, educate.

MacCannell: It's really a smart idea. We work very closely with a law firm out of California. They actually provide policy manuals and guidance for hospitality and retail, training employees on how to deal with those situations.

Kasmir: The latest construction change this year is that you have to spend 20 percent of the value of projects over a certain amount on ADA upgrades.

Sacharski: That's 17 on my contracts. We refer it on whether it's a PIP or separate renovation, whatever is in our action letter. I actually have a separate scope of work and dollar amount on a separate contract for that property strictly for ADA upgrades. If we ever get audited, we can go back and say we met our 20-plus percent.

We over achieved on this particular item because the documentation seven years later to go back and back out. What did you spend on labor? What did you spend on materials? What did you spend on specific ADA?

The miniature horse thing has been a concern because I want to make sure I understanding it correctly. I want to make sure we comply on our end. Do we have to put up some type of walking path? What if there are people allergic to the straw that we put down? It could get really out of control.

MacCannell: When we do presentations that talk about the spending value of people with disabilities, you'd be overwhelmed. This group spends money. And that's important if they are going to spend freely in restaurants and hotels if they welcome. A lot of buying decisions are made by one out of 15 or one out of 50 in a group. People just don't often think of it that way. How much of an impact is there?

SA

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CIRCLE NO. 30

CCR: Is there a certain criteria for how many parking spaces a store should have?

MacCannell: There is. They're based on the number of spaces you have. If you have X amount of parking spaces, you must designate a certain amount to handicapped spots.

Sacharski: Besides the normal ADA parking, you also must have van accessibility, which are full spaces and almost a half because of that extra space for the van. Some of the buildings and footprints on buildings and properties that are 30 or 40 years old now have to comply with the ruling. In order to have a business license today, you have to comply with the ruling. You have to have X amount of parking spaces available just for your guests and now you have to work the ADA angle.

MacCannell: People who do restriping made some money.



Sacharski: You bet.

CCR: How far off have companies been on being ADA compliant?

MacCannell: A store can be perfectly compliant, but if a manager moves a table it could be out. All it takes is one person to walk in or call.

Sacharski: Do you know how many hot tubs we've abandoned?

MacCannell: We're finding it nationally.

Kasmir: We work in a very old shopping center. We take over the second floor of this little mall. I broke my foot and was on crutches. The building was so old that they didn't have the automatic door push, so I could not get into the building. I made

the landlord retrofit the doors, and she said to me, "It's not a code issue."

And I said, "You're right; it's not a code issue. It's a civil rights issue. So, if you want me to sue you, which I will, put these in."

I did not have equal access to work. I had to call someone in the office to come in and open the door for me. That's not right.

Sacharski: It's all about education. We have an area in some of our properties called "The market." In order to get over the 1730 for the reach, we brought everything down that's on the shelves and put it in a basket so it's right there. We complied. We don't want to discriminate against anybody. I have family members and dear friends who are handicapped and in wheelchairs. It's close to home for me – very close to home. I understand that because I'm in a wheelchair I shouldn't have to ask for assistance. I should be able to do it on my own.

Ferris: We have a roll-out that we just got because of some labor laws in California to put in new time clocks across a bunch of stores – 200 or so. We have to mount them 52.5 inches high. So, if what you are doing is to be ADA compliant, how much of the money can go toward the ADA spend? Should we break those numbers out?

Whalen: The labor would go toward that.

Ferris: We're not providing the time clocks, ADP is. We're installing them so we should break that out in the invoice.

Sacharski: I had to go and back out numbers to come up with what was spent specifically on a project two years ago. Moving forward, it will be real easy to price it out. It's real easy for the procurement company that you're using to say, "Look, these are

the grab bars I need. These are straight shower rods and shower curtains. This is the toilets [etc.].

I believe 100 percent of that labor definitely goes against what you've spent, what you put in. And then you put in your action plan what you plan on spending for your five-year plan. If it's just upgrading shower curtains, that cost can go into that.

Ferris: Yes. The time clock had to go in because of labor laws. It was interesting to me. It makes the spend easier to accomplish.

MacCannell: One of the biggest things we tell people is that if you're doing good and you know it, that's good. If you're doing bad and you know it, that's good. But if you don't know how you're doing, that's the worst-case scenario. The worst thing you can do is to ignore it. It is education. **CCR**