


**FTA**  
FEDERAL TRANSIT ADMINISTRATION

**ADA and  
Transportation Facilities**

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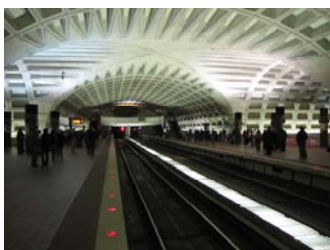
**FTA Circular 4710.1**

FTA Office of Civil Rights  
March 16, 2016

  
U.S. Department of Transportation  
Federal Transit Administration

## Overview

- Background
- Chapter 3: Transportation Facilities
- Chapter 5: Equivalent Facilitation
- Questions



## Circular Background

- Helps avoid oversight findings
- Contains no new requirements
- Covers 49 CFR 27, 37, 38, 39, and Facility Standards
- Provides one-stop shopping



## Circular Organization: 12 Chapters

Chapter	Topic
1	Introduction and Applicability
2	General Requirements
<b>3</b>	<b>TRANSPORTATION FACILITIES</b>
4	Vehicle Acquisition and Specifications
5	Equivalent Facilitation
6	Fixed Route Service
7	Demand Responsive Service
8	Complementary Paratransit Service
9	ADA Paratransit Eligibility
10	Passenger Vessels
11	Other Modes
12	Oversight, Complaints, and Monitoring

## Standards for Buildings and Facilities

- Established by U.S. Access Board
  - Federal agencies must adopt as minimum
- DOT adopted latest standards in 2006
  - + 4 additions/modifications = DOT Standards
    - Located in Appendix A to 49 CFR Part 37 and Appendices B and D to 36 CFR Part 1191
- Use the right standards!
  - Differ from Access Board's 2004 ADAAG
  - Differ from DOJ "2010 Standards"
- Current standards are 2006 DOT Standards



## Transit Agency Jurisdiction

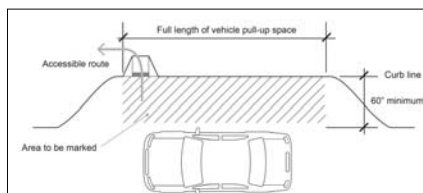
- Public entities required to follow DOT Standards when constructing new transportation facilities or altering existing ones
  - Must operate transportation facility in a manner that is "accessible to and usable by individuals with disabilities"
- Coordination with other entities
- Shared intercity and commuter rail stations
- Bus stops





## Common Issues: Passenger Loading Zones

- DOT Standards Section 503
- Clearly marked 60-inch wide access aisle
- Changes in level between access aisle and vehicle pull-up space not permitted



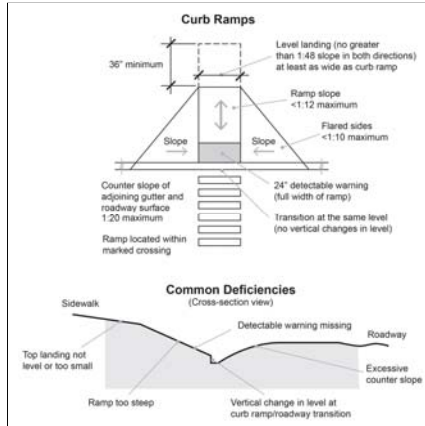
## Common Issues: Passenger Loading Zones

- Attachment 3-1 Optional Facilities Checklist
- Section 2 on Passenger Loading Zones

2 Passenger Loading Zones (DOT Standards 209, 503)	
Number	Note OK, No, or N/A. Note dimensions if No
Where loading zones are provided, at least one accessible loading zone space provided (209.2)	
At least one accessible space in every 100 linear feet of total loading zone space (209.2.1)	
<b>Vehicle Pull-up Space (503.2)</b>	
≥ 95" wide and ≥ 20' long	
<b>Access Aisle Location (503.3)</b>	
Adjacent to vehicle pull-up space	
Adjoins/connects to an accessible route	
Does not overlap vehicular way	
<b>Access Aisle Dimensions</b>	
≥ 60" wide (503.3.1)	
Extends full length of vehicle pull-up space it serves (503.3.2)	
<b>Surface</b>	
Access aisle marked with surface treatment to discourage parking in access aisle (503.3.3)	
Vehicle pull-up space and access aisle: Stable, firm, and slip resistant and no changes in level > 1/2" (503.4) (302.1)	
Vehicle pull-up space and access aisle: Slope ≤ 1:48 (2.1%) in all directions (503.4)	
Vehicle pull-up space and access aisle at same level with no changes in level (503.4)	
<b>Vertical Clearance (503.5)</b>	
At least 114" vertical clearance at vehicle pull-up spaces, access aisles, and vehicular route from entrance to passenger loading zone, and from passenger loading zone to vehicular exit	

## Common Issues: Curb Ramps

- DOT Standards Section 406
- Common deficiencies
  - Top landing too small
  - Ramp too steep
  - Counter slope too steep
  - **Missing detectable warnings**
- Monitoring



## Common Issues: Curb Ramps

- Attachment 3-1 Optional Facilities Checklist
- Section 6 on Curb Ramps

**6 Curb Ramps (DOT Standard 406)**

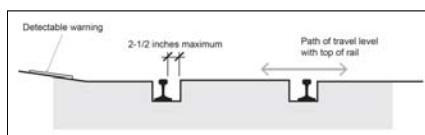
Curb ramps or ramps are required wherever there is a vertical change of  $\geq 1'$  on an accessible path (303.4). Identify locations where curb ramps are on the accessible route and/or curbs where there are no ramps. Attach additional sheets for additional curb ramps and identify locations on map or diagram.

Curb Ramp 1: \_\_\_\_\_ Curb Ramp 4: \_\_\_\_\_  
 Curb Ramp 2: \_\_\_\_\_ Curb Ramp 5: \_\_\_\_\_  
 Curb Ramp 3: \_\_\_\_\_ Curb Ramp 6: \_\_\_\_\_

Note OK, No, or N/A. Note dimensions if No	Ramp Location					
	1	2	3	4	5	6
Ramps (except flared sides) at marked crossings are within the markings (406.5)						
Diagonal curb ramps at marked crossings have $\geq 48"$ clear from ramp bottom to the marking (406.5)						
Ramp $\geq 36"$ wide, not including flared sides (406.1) (405.5)						
Landings $\geq 36"$ long and $\geq$ width of the curb ramp located at top of ramp (406.4)						
Transition to adjacent surfaces of walks, gutters, and streets shall be at the same level (406.2)						
All ramp slopes, $\leq 1:12$ (8.3%) (406.1) (405.2)						
Side flares $\leq 1:10$ (10%) (406.3)						
Cross slope $\leq 1:48$ (2.1%) (405.3)						
Ramp slopes at sites where space limitations exist, $\geq 1:10$ (10%) to $\leq 1:8$ (12.5%) for $\leq 3'$ rise (405.2)						
$\geq 1:12$ (8.3%) to $\leq 1:10$ (10%) for $\leq 6'$ rise (405.2)						
Counter slope of adjoining gutter, road, or accessible route surface $\leq 1:20$ (5%) (406.2)						
Islands at street crossings either: Cut through level with the street surface (406.7)						
Curb ramps provided at both sides of island with a $\geq 48"$ long $\geq 36"$ wide level area connecting the ramps (406.7)						
<b>Detectable Warnings (406.6, 705)</b>						
Width: (406.6)						
Full depth of curb ramp or $\geq 24"$ from the back of curb						
The detectable warning contrasts visually with adjoining surfaces, either light-on-dark or dark-on-light (705.1.3)						
The detectable warning consists of raised truncated domes with: Base diameter $\geq 0.9'$ to $\leq 1.4'$ and top diameter 50% to 65% of base diameter (705.1.1)						
Height of 0.2" (705.1.1)						
Center-to-center dome spacing $\geq 1.6'$ to $\leq 2.4'$ and base-to-base dome spacing $\geq 0.65'$ (705.1.2)						

## Common Issues: Track Crossings

- DOT Standards  
Section 810.10
- Flangeway gaps > 2.5" can cause mobility devices to become caught or stopped within a track crossing



- Maintaining accessibility features in operative condition

## Common Issues: Station Platforms

- Detectable warnings
- Station name signage
- Directions to accessible means of egress



## Common Issues: Station Platforms

- Attachment 3-1  
Optional Facilities Checklist
- Section 15 on  
Platforms

**15 Platforms (DOT Standards 403, 810)**

Fill out survey sheet for each platform assessed. Identify each platform below:

Platform 1: \_\_\_\_\_ Platform 3: \_\_\_\_\_  
Platform 2: \_\_\_\_\_ Platform 4: \_\_\_\_\_

Indicate OK, No, or N/A. Note dimensions if No	1	2	3	4
<b>Clearances</b>				
Along the accessible route to the platform, clear width at least 36" wide, except:				
Clear width may be 32" wide to < 36" wide for distance of $\leq 24'$ provided that narrower segments are separated by segments of at least 48' (403.5.1)				
At intervals of $\leq 200'$ , route clearance $\geq 60'$ wide for distance of $\geq 60'$ (passing space) (403.5.3)				
<b>Platform Width (66, 37.9, 37.41-37.43, 38, 126)</b>				
For a new or altered conventional non-level boarding side passenger platform with a railing or wall on the platform side opposite the track, minimum platform width at least 12 feet. (See DOT Rule O&A Guidance)				
For a new or altered conventional level boarding side passenger platform with a railing or wall on the platform side opposite the track, minimum platform width at least 8 feet. (See DOT Rule O&A Guidance)				
<b>Slope (810.5.1)</b>				
Parallel to the track the slope is $\leq 1.48$ (2.1%)				
Exception: if existing track $\leq$ the slope of the track				
Perpendicular to track the slope is $\leq 1.48$ (2.1%)				
<b>Detectable Warning</b>				
Platform boarding edges, not protected by screens or guards, have a detectable warning along the full length of the public use area of the platform (810.5.2, 705.2)				
The detectable warning contrasts visually with adjoining surfaces, either light-on-dark or dark-on-light (705.1.3)				
The detectable warning is 24" wide (705.2)				
The detectable warning consists of raised truncated domes with:				
Base diameter $\geq 0.9'$ to $\leq 1.4'$ ; top diameter 50% to 60% of base diameter (705.1.1)				
Height of 0.2" (705.1.1)				
Dome center-to-center spacing $\geq 1.6'$ to $\leq 2.4'$ ; base-to-base dome spacing $\geq 0.65'$ (705.1.2)				
<b>Platform Signs</b>				
At least one tactile sign with raised characters and braille on each platform or				

## New Construction

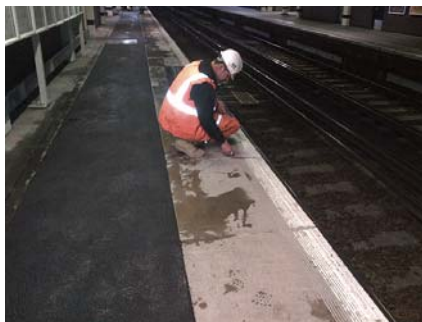
- New facilities must comply with DOT Standards
  - New stations
  - Bus boarding areas
  - Intermodal centers
- Structural impracticability
  - Limited exception
  - Requires documentation
  - Still must meet DOT Standards to “greatest extent possible”





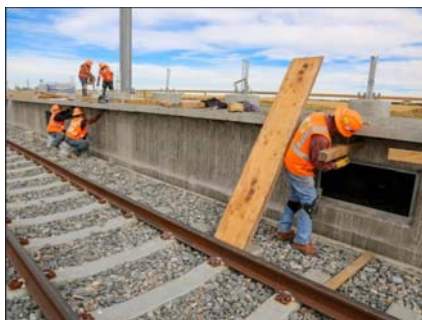
## Alteration of Transportation Facilities

- Altered elements must be accessible
  - Changes to a facility
  - Maintenance is not an alteration
- To the maximum extent feasible
  - Technical infeasibility
  - Show your work



## Alteration of Transportation Facilities

- Alteration of Primary Function Area
  - Altered elements must be accessible
  - Path of travel must also be accessible
    - Unless cost is disproportionate
    - >20% of cost of alterations



## Alteration of Transportation Facilities

### General alteration

Maximum extent feasible (MEF)

- Exception: technically infeasible (cost not considered)



### Alteration to primary function area

Maximum extent feasible (MEF)

- Exception: technically infeasible (cost not considered)

Must also make path of travel accessible to MEF

- Exception: disproportionate costs (only for path of travel)

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19

## Key Stations

- Designated stations required to be made accessible
  - Deadline for existing rail systems
  - One of few “affirmative” ADA requirements
- Myth: “Only key stations need to be accessible”



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20

## Platform-Vehicle Coordination

- Level boarding:



Mini-High Platform with Appropriate Barrier

Mini-High Platform

- Other means of compliance
  - Mini-high platforms
  - Ramps
  - Bridge plates

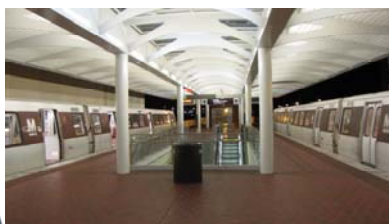


Bridge Plate

Platform Lift

## Programs and Activities in Existing Facilities

- Must be conducted so that, when viewed in their entirety, they are readily accessible to and usable by individuals with disabilities
- Examples:
  - User-friendly fare cards
  - User-friendly schedules
  - Edge detection on rail platforms
  - Adequate lighting
  - Display and broadcast devices
  - PA systems

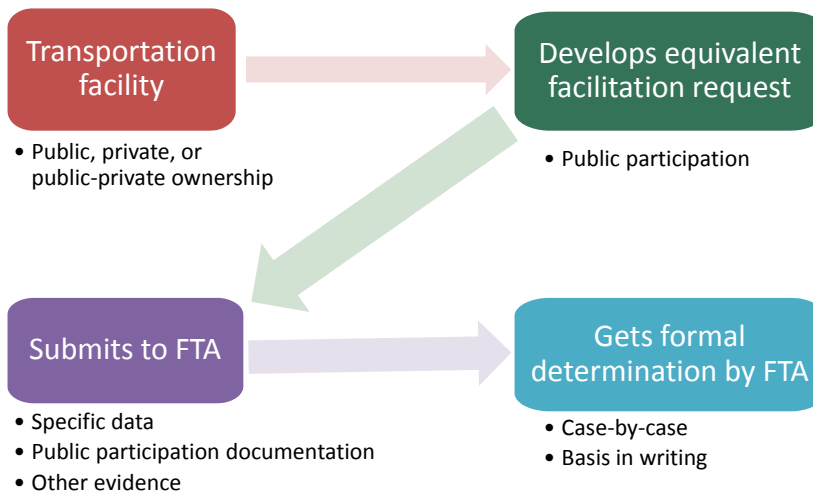


## What Is Equivalent Facilitation?

- Permission to depart from DOT Standards
- Allows for innovation in accessible design
  - Equal or greater accessibility
  - Not a waiver
- Requires formal determination by FTA
- Made on case-by-case basis



## Equivalent Facilitation for Facilities



## Suggestions for Equivalent Facilitation Requests

Do	Don't
<ul style="list-style-type: none"><li>• Provide your actual test results</li><li>• Perform the testing with a realistic mockup and with a cross-section of potential passengers with varying types of disabilities and mobility aids</li><li>• Perform statistical analysis on a large enough sample</li><li>• Provide complete documentation of public participation</li><li>• Include all the required information</li></ul>	<ul style="list-style-type: none"><li>• State it is difficult to comply with the regulatory standards; inability to comply is not a basis</li><li>• Rely on evidence from another system</li><li>• Combine requests for determination of equivalent facilitation for separate issues (e.g., vehicle ramp design and platform design)</li><li>• Forget to include all information needed to make the request complete</li></ul>

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25

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