

STAFF REPORT

DATE: June 10, 2024
TO: Sacramento Regional Transit Board of Directors
FROM: Henry Ikwut-Ukwa, VP, Capital Programs
SUBJ: APPROVING AN EXCEPTION TO THE CALIFORNIA BUILDING CODE STANDARDS FOR DIRECTIONAL TILE AT LIGHT RAIL VEHICLE DOOR OPENINGS UNDER GOVERNMENT CODE SECTION 4451(F)

RECOMMENDATION

Adopt the Attached Resolution.

RESULT OF RECOMMENDED ACTION

Approving an exception to the California Building Code requirement for directional boarding tile requirement will provide for equivalent facilitation and protection of individuals with disabilities while Sacramento Regional Transit District (SacRT) runs both low-floor and high-floor vehicles before the high-floor vehicles are decommissioned.

FISCAL IMPACT

No fiscal impact.

DISCUSSION

Under Government Code Section 4451, SacRT must comply with all building standards published in the California Building Standards Code (CBC)(Title 24, California Code of Regulations) relating to access for persons with disabilities.

Subsection 11B-7095 of the CBC requires that transit boarding platforms have detectable directional textures, also known as door indicator tiles, “aligning will all doors of the transit vehicles where passengers will embark” to aid individuals with visual impairments in locating a door for boarding.

The typical SacRT light rail station platform layout includes a mini-high platform at the end of the station platform, aligning with the first door of the first vehicle in a train set. The mini-high platform primarily serves mobility device users who require deployment of a ramp for level boarding. As noted in prior Board actions, the stations are currently being converted so that a portion of the station platform is 8” above the original grade for boarding of the new S700 low floor light rail vehicles.

Because service may operate with only a single vehicle, the existing door indicator tiles are placed at the station platform to align with the first vehicle of a train set composed of high-floor vehicles (original Siemens or CAF vehicle). The door indicator tiles on the platform are located at the second, third, and fourth doors of the first vehicle since the first door of the first vehicle lines up at the mini-high platform.

Later this year (2024), SacRT will introduce new Siemens S700 low-floor light rail vehicles. The length and center door locations of the new vehicles do not match the legacy fleet. In addition, the new low floor vehicles will not use the mini-high platforms for mobility device users since the new vehicles include passenger-activated bridge plates to access the train from the newly-raised boarding platform.

When SacRT begins operating both the high-floor and low-floor LRV fleets, the doors for each train will be at different locations depending on whether it is a high or low floor train. If SacRT complied with the literal requirements of the CBC and provided door indicator tiles for all doors of the S700 vehicles, in addition to the existing legacy fleet indicator tiles, there would be potential confusion and safety concerns for users. Users with visual impairments might be directed to a location that did not align with a vehicle door for the particular train arriving in the station.

Under Government Code Section 4451(f), the Board can adopt an exception to the literal requirements of the CBC if it is “clearly evident that equivalent facilitation and protection that meets or exceeds the requirements under federal law are thereby secured.” There is no federal requirement for door indicator tiles and Staff believes that an alternative is available to the literal CBC requirement that provides greater accessibility and usability and presents the least risk of harm, injury or hazard to individuals with disabilities.

Staff is proposing to provide equivalent facilitation of the accessibility required under the CBC for individuals with visual impairments through the following means:

- (1) Installing a single door indicator tile on the raised portion of the station platform where the S700 vehicles will stop to align with one of the S700 doors; and
- (2) Removing all other existing door indicator tiles and directing individuals with visual impairments to board high-floor vehicles at the mini-high platform.

This solution clearly directs individuals with visual impairments to a guaranteed door location for their safety and convenience. As part of SacRT’s Contract for Light Rail Communication Enhancement Service, audible announcements will be implemented to notify waiting passengers whether the next arriving train will be a high-floor “legacy” train or a new Siemens S700 train, so that individuals with both mobility and visual impairments will be directed to the appropriate door location for boarding. This will be a temporary solution until the legacy fleet is retired, at which point SacRT will comply with the CBC standards.

RESOLUTION NO. 2024-06-062

Adopted by the Board of Directors of the Sacramento Regional Transit District on this date:

June 10, 2024

APPROVING AN EXCEPTION TO THE CALIFORNIA BUILDING CODE STANDARDS FOR DIRECTIONAL TILE AT LIGHT RAIL VEHICLE DOOR OPENINGS UNDER GOVERNMENT CODE SECTION 4451(F)

WHEREAS, Government Code Section 4551(c) requires that SacRT comply with all building standards published in the California Building Standards Code (CBC)(Title 24, California Code of Regulations) relating to access for persons with disabilities; and

WHEREAS, the CBC requires the installation of detectable directional texture on transit boarding platforms aligning with “all doors” of transit vehicles where passengers will embark; and

WHEREAS, Government Code Sections 4453 and 4451(f) permit the governing body of an agency subject to compliance with the CBC to make an exception to the literal requirements of the CBC when it is clearly evident that equivalent facilitation and protection that meets or exceeds the requirements under federal law are thereby secured; and

WHEREAS, both high-floor and low-floor light rail vehicles will operate on SacRT’s light rail system until such time as the high-floor vehicles are retired; and

WHEREAS, door indicator tiles cannot be placed to guarantee that the tile will line up with a door locations because each type of LRV has different door locations, presenting a safety hazard and potentially preventing individuals with visual impairments from boarding.

NOW, THEREFORE, BE IT HEREBY RESOLVED BY THE BOARD OF DIRECTORS OF THE SACRAMENTO REGIONAL TRANSIT DISTRICT AS FOLLOWS:

THAT, the Board of Directors finds that the following alternative to placement of door indicator tiles at “all doors” provides equivalent facilitation for individuals with visual impairments in that it provides greater accessibility and usability and presents the least risk of harm, injury or hazard to individuals with disabilities:

- (1) Installing a single door indicator tile on the raised portion of the station platform where the S700 vehicles will stop to align with one of the S700 doors; and
- (2) Removing all other existing door indicator tiles and directing individuals with visual impairments to board high-floor vehicles at the mini-high platform.

THAT, for the foregoing reason, the Board approves a temporary exception to the literal requirements of Subsection 11B-7095 of the California Building Code (CBC).

THAT, this exception will expire at the time the high-floor vehicle fleet is removed from service.

PATRICK KENNEDY, Chair

A T T E S T:

HENRY LI, Secretary

By: _____
Tabetha Smith, Assistant Secretary