

Program Accessibility

Public Entity Riverside County Transportation Commission Date April 11, 2022

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Public entities must ensure that people with disabilities are not excluded from programs, activities, and services because of inaccessible facilities. A public entity's services, programs, or activities, when "viewed in their entirety," must be accessible, this means each facility is not necessarily required to be accessible. This standard is known as "program accessibility" and is a key requirement under Title II.

Structural changes are not required where there are other feasible solutions such as moving a public event to an accessible location. However, structural changes lead to increased integration and accessibility, therefore they should be considered where feasible. Facilities built before January 26, 1992, are referred to as "pre-ADA" facilities. If there is an architectural barrier to accessibility in a pre-ADA facility, one may remove the barrier using the ADA Standards for Accessible Design or UFAS as a guide, or one may choose to make the program, service, or activity located in the building accessible by providing "program access."

RCTC facilities and stations are not "pre-ADA". For RCTC stations used by the public, structural solutions are required to remove all the identified physical barriers. These barriers are identified in Attachments 6A through 6I and prioritized in Attachment 8, Transition Plan.

For RCTC employee facilities, some structural solutions are required to remove the identified physical barriers. These are included in Attachments 6J through 6P and prioritized in Attachment 8, Transition Plan. Nonstructural solutions to make programs accessible in inaccessible facilities are listed here, and are detailed in Attachment 9, Action plan. RCTC's employee facilities are strictly restricted facilities meant for use by authorized personnel only. The entrance lobby and conference rooms of the RCTC office, RCA office, and portions of the CSC are open to public.

Accessibility issues related to general nondiscrimination, emergency management, effective communication, website, and administrative requirements such as public Notice of ADA compliance, and Grievance Procedure are identified in Attachments 2,3, 4, and 5. Nonstructural solutions are listed here and also further detailed in Attachment 9, Action Plan.

Programs, Activities, and Services in Stations	Nonstructural Solutions	Structural Solutions
A. West Corona Station		
1. All physical barriers in West Corona Station are identified and listed in Attachment 6A	none	See Attachment 6A and Attachment 8
B. North Main Corona Station		
2. All physical barriers in North Main Corona Station are identified and listed in Attachment 6B	none	See Attachment 6B and Attachment 8
C. La Sierra Station		
3. All physical barriers in La Sierra Station are identified and listed in Attachment 6C	none	See Attachment 6C and Attachment 8
D. Riverside Downtown Station		
4. All physical barriers in Riverside Downtown Station are identified and listed in Attachment 6D	none	See Attachment 6D and Attachment 8
E. Pedley Station		
5. All physical barriers in Pedley Station are identified and listed in Attachment 6E	none	See Attachment 6E and Attachment 8
F. Downtown Perris Station/Perris Transit Center		
6. All physical barriers in Downtown Perris Station are identified and listed in Attachment 6F	none	See Attachment 6F and Attachment 8
G. Riverside Hunter Park Station		
7. All physical barriers in Riverside Hunter Park Station are identified and listed in Attachment 6G	none	See Attachment 6G and Attachment 8
H. Moreno Valley/March Field Station		
8. All physical barriers are identified and listed in Attachment 6H	none	See Attachment 6H and Attachment 8
I. South Perris Station and Layover Facility.		
9. All physical barriers in Moreno Valley/March Field Station are identified and listed in Attachment 6I	none	See Attachment 6I and Attachment 8

Programs, Activities, and Services in RCTC Facilities	Nonstructural Solutions	Structural Solutions
J. RCTC Office, Lemon Street		
10. All physical barriers in the RCTC Office are identified and listed in Attachment 6J	none	See Attachment 6J and Attachment 8
K. RCA Office Tenth Street		
11. All physical barriers in the RCA office are identified and listed in Attachment 6K	none	See Attachment 6K and Attachment 8
L. ROC Building		
12. All physical barriers in the ROC Building are identified and listed in Attachment 6L	none	See Attachment 6L and Attachment 8
M. CSC Building		
13. All physical barriers in the CSC Building are identified and listed in Attachment 6M	none	See Attachment 6M and Attachment 8
N. FAM Building		
14. All physical barriers in the FAM Building are identified and listed in Attachment 6N	none	See Attachment 6N and Attachment 8
15. FAM building currently has a single ADA compliant means of egress and no emergency evacuation procedures were provided for review. So, it cannot be definitively concluded that special procedures are included for assisting individuals with disabilities from this facility during an emergency, in the event that the single accessible means of egress is compromised.	Until the facility is made accessible to comply with the ADA, update any existing emergency evacuation procedures to include evacuation of individuals with disabilities who may be present in the building during an emergency event that compromises the single accessible means of egress.	
16. The warehouse and the unoccupied upper floor in the FAM building are inaccessible	Designate responsible staff to obtain any items stored in inaccessible spaces when a request is made by a person/employee who is unable access those areas.	Modify the warehouse to allow approach, entry, and exit of people having disabilities, as required by the ADA. See Attachment 6N and Attachment 8

Programs, Activities, and Services in RCTC Facilities	Nonstructural Solutions	Structural Solutions
O. TUB-1		
17.All physical barriers in TUB -1 are identified and listed in Attachment 6O	A Personal Assistance Service (PAS) can be provided as a reasonable accommodation to enable an employee with disabilities to perform the essential functions of a job.	See Attachment 6O and Attachment 8
P. TUB-2		
18.All physical barriers in TUB-2 are identified and listed in Attachment 6P	A Personal Assistance Service (PAS) can be provided as a reasonable accommodation to enable an employee with disabilities to perform the essential functions of a job.	See Attachment 6P and Attachment 8
Nondiscrimination Policies and Procedures		
19.General nondiscrimination issues	See Attachment 2 and Attachment 9	
Emergency Management		
20. Emergency evacuation plans for stations were not available for review, so it cannot be definitively stated that special procedures are included for assisting individuals with disabilities from these facilities during an emergency.	Update any existing emergency evacuation procedures to include evacuation of individuals with disabilities during an emergency. See Attachment 9.	
Effective Communication		
21.Barriers to Effective Communication	See Attachment 3 and Attachment 9	
Website Accessibility		
22.Website Accessibility Barriers	See Attachment 4 and Attachment 9	
Administrative Requirements – Public Notice, Grievance Procedure, ADA Coordinator		
23.Accessible formats for Public Notice of ADA compliance and Grievance Procedure are not available	See Attachment 5 and Attachment 9	

Existing RCTC facilities were designed and approved to comply with the local accessibility standards applicable at the time of building permit. The table below lists the applicable federal ADA standards that were used to evaluate each RCTC facility, depending on the age of the facility and dates of alterations. Recommendations in Attachments 6A through 6P are based on the 2010 ADA standards which will apply to all new constructions and alterations.

	Building/Facility Name	End Date of Construction	Date and Type of Alteration	Applicable Federal ADA Standards at the time of Construction/Alteration	Comments
1	RCTC Office Space County of Riverside Building	n/a	n/a Tenant Renovations	1991 Standards or UFAS	Leased from Riverside County in in 2007
2	Regional Conservation Authority Office Space	n/a	n/a Tenant Renovations	1991 Standards or UFAS	Leased from Riverside County in in 2007
3	West Corona Metrolink Station	9/27/1995	6/21/2001 1/21/2003 Overcrossing CCTV, etc.	1991 Standards or UFAS	
4	North Main Corona Station	8/25/2003	1/1/2009 Parking Garage	1991 Standards or UFAS	Station opened on 11/22/02
5	La Sierra Station	11/8/1995	6/21/2001 1/21/2003 3/20/2003 12/31/2019 Overcrossing CCTV, etc. Parking lot exp. Ph-I Parking lot exp. Ph-II	1991 Standards or UFAS for station and overcrossing DOT ADA Standards 2006 and/or 2010 ADA Standards for Parking lot	Accessible routes from the altered areas are evaluated against DOT ADA Standards 2006 and/or 2010 ADA Standards.

	Building/Facility Name	End Date of Construction	Date and Type of Alteration	Applicable Federal ADA Standards at the time of Construction/Alteration	Comments
6	Riverside Downtown Station & Operations Center	6/14/1993	12/16/1999 Overcrossing, CCTV, etc. 3/19/2003 9/8/2005 Parking lot expansion 1/4/2007 Parking lot upgrade 12/4/2015 E. Parking lot expansion 10/9/2020 Security Ops Ctrl Center 7/17/2019 Layover Facility TVM Project	1991 Standards or UFAS for station and overcrossing DOT ADA Standards 2006 for parking 2010 ADA Standards for SOC and TVM	Layover facility was not evaluated. Accessible routes from the altered areas are evaluated against DOT ADA Standards 2006 and/or 2010 ADA Standards.
7	Pedley Station	10/14/1993	6/24/2003 Emergency Platform 10/7/2003 Ext CCTV Installation	1991 Standards or UFAS	
8	Downtown Perris Station / Perris Transit Center	10/20/2017	11/30/2009 Temp Bus Depot	DOT ADA Standards 2006 and/or 2010 ADA Standards	
9	Riverside Hunter Park Station	10/20/2017	12/31/2019 Canopies	DOT ADA Standards 2006 and/or 2010 ADA Standards	
10	Moreno Valley/March Field Station	10/20/2017	12/31/2019 Canopies	DOT ADA Standards 2006 and/or 2010 ADA Standards	
11	South Perris Station and Layover Facility.	10/20/2017	12/31/2019 Canopies	DOT ADA Standards 2006 and/or 2010 ADA Standards	
12	Regional Operations Center (ROC)	2007	2018 Tenant Renovations	DOT ADA Standards 2006 and/or 2010 ADA Standards	
13	Customer Service Center (CSC)	2007	2018 Tenant Renovations	DOT ADA Standards 2006 and/or 2010 ADA Standards	

	Building/Facility Name	End Date of Construction	Date and Type of Alteration	Applicable Federal ADA Standards at the time of Construction/Alteration	Comments
14	Facility and Maintenance Warehouse (FAM)	2018	n/a none	DOT ADA Standards 2006 and/or 2010 ADA Standards	
15	TUB 1 – 91 West Toll Utility Building	2017	n/a none	DOT ADA Standards 2006 and/or 2010 ADA Standards	
16	TUB 2 – 91 East Toll Utility Building	2017	n/a none	DOT ADA Standards 2006 and/or 2010 ADA Standards	