

DEPARTMENT OF TRANSPORTATION DISABILITY LAW GUIDANCE

FULL-LENGTH, LEVEL-BOARDING PLATFORMS IN NEW COMMUTER AND INTERCITY RAIL STATIONS

Under Department of Transportation ADA and section 504 regulations, the norm for new commuter and intercity rail stations is a platform running the full length of the passenger boarding area of the station that permits level boarding to all accessible cars of trains stopping at the station. Level boarding for all cars of a train is significant because, if passengers with disabilities are unable to enter all cars from the platform, the passengers will have access only to segregated service. This would be inconsistent with the nondiscrimination mandate of the ADA. It would also, in the case of Federal Transit Administration (FTA) and Federal Railroad Administration (FRA)-assisted projects (including Amtrak), be inconsistent with the requirement of the Department's section 504 regulation (49 CFR §27.7), which requires service in the most integrated setting reasonably achievable.

In the Department's ADA regulations (49 CFR Part 37, Appendix A, §10.3.1(9)), level boarding is defined as involving a horizontal gap of no more than three inches and a vertical gap of no more than 5/8 inches (1.5 inches for existing vehicles operating in new stations). However, the Department now is convinced that meeting and/or maintaining the 3" and 5/8" inch gap requirements is likely to be infeasible in most commuter and intercity rail stations. Freight rail track sharing, ballast compression and tamping, track and wheel wear, and/or rail car sway or roll contribute to this infeasibility.

The regulatory language governing situations where meeting existing gap requirements is infeasible is as follows:

In...commuter rail and intercity rail systems where it is not operationally or structurally feasible to meet the horizontal or vertical gap requirements, mini-high platforms, car-borne or platform-mounted lifts, ramps or bridge plates, or similar manually deployed devices, meeting the applicable requirements of 36 CFR part 1192, or 49 CFR Part 38, shall suffice. 49 CFR Part 37, Appendix A, §10.3.1(9), Exception 2.

In situations where meeting gap requirements is infeasible, commuter and intercity rail operators still may often be able to provide full-length, level-entry boarding to all accessible cars of trains by using a high-level platform in conjunction with short bridge plates that provide access to each car. If this approach is feasible, it should be the option of choice.

If this approach is infeasible, then another solution permitting access to all cars of the train should be employed (e.g., car-borne or station-based lifts serving each accessible car). This

approach, while less desirable operationally and as a matter of passenger service, still permits fully integrated service to the train.

In cases where there are concerns about accommodating freight trains (including overdimensional loads) through commuter or intercity rail stations, commuter and intercity rail operators should employ solutions that accommodate both types of traffic in the presence of full-length high-level platforms, such as gauntlet or bypass tracks, unless doing so is technically or operationally infeasible.

In determining whether a particular station design or accessibility solution is feasible, the Department looks at each station on an independent, case-by-case basis. It may be possible that full-length level boarding is feasible at some stations but not others on a system. For example, suppose that, in a commuter rail system with 15 stations, the commuter rail authority demonstrates to FTA that full-length level boarding is infeasible at three stations. The other 12 stations still would have to have full-length level boarding.

In considering the facts at a given station, FTA and FRA do not view the fact that providing full-length level boarding may entail some disadvantages or additional costs, standing alone, as demonstrating infeasibility.

In any situation using a combination of high and low platforms, a commuter or intercity rail operator should not employ a solution that has the effect of channeling passengers into a narrow space between the face of the higher-level platform and the edge of the lower platform. Such a design is inherently unsafe. In this regard, [any obstructions on a platform \(stairwells, elevator shafts, seats, etc.\) should be at least 6 feet back from the edge of a platform.](#) Commuter and intercity rail operators should also take into account the uncertainties in the stopping position of trains in planning for accessibility solutions.

[If a new commuter station is to be used by Amtrak as well as commuter rail, then when designing new stations and purchasing rolling stock, the floor height of existing Amtrak cars should be taken into account.](#)

[Passengers should not be expected to step down from a platform into a rail passenger car. In addition, the floor at all passenger car doors assessing a platform should extend at least to the edge of the passenger car outer-side wall. In other words, the rail car door should not be recessed from the platform in such a way that level boarding is impossible or that a longer bridge plate would be required to traverse the gap.](#)

[The platform height should be measured with worn vehicle components \(wheels, springs, center plate, etc.\). New vehicles will typically be a few inches higher than ones with worn components.](#)

This guidance has been approved through the Department of Transportation's Disability Law Coordinating Council as representing the official views of the Department on this matter.

September 1, 2005