

Inaccessible Bus Stop Guide



Metro Transit

Halifax Regional Municipality

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Purpose

The purpose of this document is to provide Metro Transit employees, customers and other stakeholders with information regarding how Metro Transit has determined which bus stops are Inaccessible and therefore, not eligible for accessible low floor (ALF) bus service.

Background

On November 21, 2011, Metro Transit implemented changes to some of its accessibility policies and procedures as part of a recent settlement and Consent Order of the Nova Scotia Human Rights Commission (NSHRC). The changes are also consistent with recommendations forthcoming from the consultant group leading the Universal Accessibility Study commissioned by Metro Transit in late 2010, and feedback received from associated public consultation sessions.

Section 11 (4) of the order states that “all Metro Transit bus stops will be inventoried for accessibility and accessible designation signs placed on each stop that is designated accessible.” As part of this settlement, the NSHRC determined that mobility disabled customers “shall have the right to embark or disembark a functioning ALF bus at any existing Metro Transit bus stop which has not been converted into a designated accessible stop, provided that the accessible ramp can be deployed without risk of damage.” This is a change from existing Metro Transit policy. The ability to embark/disembark is no longer determined by whether the route in question is designated accessible (guaranteed 100% ALF buses on all trips), but by whether a functioning ALF bus is serving the route and trip that the customer wishes to use, as well as, the condition of individual bus stops along the route.

Due to varying conditions throughout the system, some bus stops locations have been determined to have the potential to cause damage to Metro Transit equipment when the accessible ramp is deployed. As a result, there are now three categories of stops in the system. These are:

- **Standard ALF Bus Stop** (as indicated by the International Accessibility Symbol) Meets Metro Transit’s accessibility standards for the size and location of a concrete landing pad (minimum size of 1.5m x 2.5m) which leads to a sidewalk.
- **Non-Standard ALF Bus Stops** (as indicated by no symbol) Where the ramp can be deployed, but these stops are not considered accessible under Metro Transit standards and may only be used at the customer’s own determination and risk.
- **Inaccessible Bus Stop** (as indicated by a ‘no ramp’ symbol) Where the accessible ramp cannot be deployed under any circumstance.



Standard ALF Bus Stop.



Inaccessible Bus Stop.



Non-Standard ALF Bus Stop

Determining Inaccessible Bus Stops

The NSHRC ruling left open for interpretation the meaning of what constitutes ‘no damage’. In fact the Americans with Disabilities Act (ADA) has similar requirements for transit agencies under its jurisdiction. It uses the ‘no damage’ terminology, but leaves open the interpretation to individual transit agencies.

Damage is defined as injury or harm that reduces the value or usefulness of a given object. As a result, damage with reference to the bus’s accessible ramp means anything that could harm or reduce the usefulness of the bus and ramp. This includes the ramp bending, warping or wobbling in such a way as to break or render it useless. Eliminating the potential for bending, warping or wobbling of the ramp is best achieved through proper use. The New Flyer Company (manufacturer of approximately 60% of Metro Transit’s current fleet) provides safe usage instructions with all vehicles. New Flyer states “loading and unloading of customers must be performed in a flat, open area. Do not deploy the ramp where trees, telephone poles, fire hydrants, or similar obstacles may jeopardize customer safety or damage the ramp.” Furthermore, New Flyer states “customers are to board the ramp only when it’s at ground level, and the ‘DEPLOY’ cycle is complete.”

This was interpreted to mean that the end of the ramp must be able to rest flat on the ground and no object (greater than ½ cm) is able to be placed between the ramp and the ground. Furthermore, no obstructions can be located in the area where the ramp is deployed. When the end of the ramp does not rest flat on the ground, there is the potential for the ramp to bend, wobble or crack from the strain placed on it. This would constitute damage to the ramp. Therefore, the ability for the ramp to lay flush with the ground is the largest factor in determining damage.

In the two examples below, the deploy cycle is complete, but due to the micro-geography of the area and the condition of the pavement, the ramp was not flush with the ground. Therefore, these stops were designated as **Inaccessible Bus Stops**.



Also, when determining Inaccessible Bus Stops, relevant sections of the Province of Nova Scotia's 'Motor Vehicle Act' (NS-MVA) were reviewed and taken into consideration. In some instances, the end of the ramp could lie flat, but the bus would have to be positioned in a way that would result in the operator being in contravention of a section of the NS-MVA. Therefore, stops where the operator would have to position the bus (to make the ramp lie flat), such that it would result in a contravention of the NS-MVA were determined to be inaccessible.



Section 129 (1) of the NS-MVA states "It shall be an offence for the driver of a vehicle to stop the vehicle on the street or highway for the purpose of letting off or taking on any person or persons, other than at the curb or side of the road or highway." This has been interpreted to mean that an operator is not permitted to position the bus so that the end of the accessible ramp (where it touches the ground) is in the travel way (the area between the right-hand side white line [or curb] and the centre yellow line).

In the example to the below-left, the bus is positioned so it is in compliance with Section 129 (1) of the NS-MVA. The ramp can be safely deployed without damage to it, but there is insufficient room for a mobility-impaired customer to manoeuvre on or off the ramp. For there to be sufficient room, the operator would have to position the bus in contravention of the NS-MVA, therefore, it was determined to be inaccessible.



Other considerations used included the potential for natural (hill, rocks etc.) or man-made (guardrails, benches, trees), impediments to be located within the bus waiting area. If impediments were located in the part of the waiting area that's required for accessible (1.5m x 2.5m behind the bus stop sign), then that stop was deemed inaccessible.

In the example above-left, the ramp is deployed but the location of natural impediments. The adjacent ditch combined with the slope and material of the ground makes the potential great for a customer embarking/disembarking at this location to lose their balance while on the ramp. This could cause it to bend or tip causing damage to the bus. In the example above-right, the ramp is deployed. However, it cannot be expected that the operator will find the same conditions at this bus stop year round. Due to the numerous impediments (rock, dirt etc) located in the bus stop zone. Therefore, these stop would be designated inaccessible.

As a comparison, the examples below show bus stops that meet Metro Transit's standards for accessibility. Both provide a flat, open area that is free of obstacles that may cause damage to the ramp. It also provides the minimum required space for ramp operation, plus sufficient space for the customer to manoeuvre on and off the ramp.



Policy

A stop is labelled as a **Standard ALF bus stop** when a concrete landing pad is provided with the minimum dimensions of 1.5m wide (along the curb) by 2.5m deep (away from the curb) and the pad is connected to a sidewalk.

A stop is labelled as a **Non-Standard ALF bus stop** when the end of the ramp is able to rest flat on the ground. But the ramp is not located on a landing pad that meets Metro Transit's bus stop accessibility standards, or no landing pads is provided, or the landing pad is not connected to a sidewalk.

A stop is labelled as an **Inaccessible Bus Stop** when the end of the ramp is not able to rest flat on the ground.

Reasons for Bus Stop Inaccessibility

This section lists potential reasons for a bus stop's designation to be inaccessible.

- The accessible ramp cannot be lowered in a way that allows it to rest flat on the ground.
- The accessible ramp can be lowered and rest flat on the ground, but there is insufficient room at the end of the ramp for a mobility-impaired customer to manoeuvre on or off the ramp. This lack of manoeuvrability may cause the customer to lose their balance, causing the ramp to tip and trigger damage to the ramp.

- There are man-made and natural impediments inside the bus stop waiting area that act as obstructions to the proper use of the accessible ramp and cause it to become damaged.

Conclusion

This document has provided an explanation of how Metro Transit has determined Inaccessible Bus Stops. This means that the accessible ramp cannot be deployed under any circumstance due to the possibility for risk of damage to the ramp.

References

NSHRC. "Board File No. H0-8-0983 and Board File No. H09-1227". November 18th 2010.

New Flyer Industries Ltd. "WheelChair System". 2004.