San Bernardino County
Transportation Authority



AMERICANS WITH DISABILITIES ACT (ADA) PLAN

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SAN BERNARDINO COUNTY TRANSPORTATION AUTHORITY

ADA PLAN

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Executive Summary

Why This Plan Was Developed

In compliance with the Americans with Disabilities Act (ADA), this effort supports the San Bernardino County Transportation Authority's (SBCTA) functional and administrative responsibilities under Title II of the ADA and ensures that accessible facilities are provided to individuals with disabilities in accordance with federal law.

The ADA Self-Evaluation and Transition Plan are federal requirements mandated by Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act (ADA) Title II for any public entity having fifty or more employees, regardless of whether the entity receives federal financial assistance. SBCTA is a public entity with over fifty employees and is also a recipient of federal funds. Code of Federal Regulations, Title 28, Chapter I, Part 35, as amended to conform to the ADA Amendments Act of 2008 (ADA Amendments Act) relates to nondiscrimination on the basis of disability in state and local government services. The ADA Self-Evaluation is required by 28 CFR §35.105. The ADA Transition Plan is a requirement of 28 CFR §35.150 (d).

The ADA Self-Evaluation examines services, programs, policies, practices, buildings, and facilities to identify problems or barriers that may limit accessibility by individuals with disabilities and describes potential compliance solutions. This self-evaluation of programs and policies is based on a review of SBCTA's policies and procedures, model contract documents, responses to questionnaires, and input from staff liaisons from SBCTA departments. Specifically, this Plan will outline:

- The necessary nonstructural changes resulting from self-evaluation
- Feedback on SBCTA programs and interfaces from the ADA community
- The self-evaluation of the Santa Fe Depot, which falls under the authority of SBCTA, via the Certified Access Specialist (CASp) assessment performed in 2024.
- The ADA Transition Plan describing the structural changes required to make the Santa Fe Depot accessible



Self-Evaluation of Nondiscrimination Policies and Practices in Programs, Services and Activities

Overview

In an effort to provide and maintain compliance with Title II of the ADA, SBCTA's Management Services division contracted with AMMA Transit Planning, Inc., to undertake a comprehensive assessment of SBCTA's policies, practices, and procedures, as well as its facilities to determine compliance with the requirements of the ADA. The review and recommendations provided in this assessment go beyond compliance assessment to recommend enhancements to current conditions that would result in a more usable, inclusive, and welcoming environment for members of the San Bernardino County community. This document includes information regarding corrective actions; recommendations grounded in Title II of the ADA for each identified area requiring action and recommended best practices. The assessment included nondiscrimination in policies, practices, and procedures for all of SBCTA's programs, services, and activities (including those related to effective communication, policies, and practices related to employment). This report summarizes the consultant's findings of ADA Title II compliance. The information pertinent to this assessment was obtained by an ADA questionnaire developed by SBCTA in June 2024.

SBCTA staff understands many of its obligations under Title II of the ADA, however, additional steps are necessary to ensure that people with disabilities enjoy the same opportunities to participate in its programs, services, and activities as San Bernardino residents without disabilities.

The full Self-Evaluation can be found in Appendix A.

Analysis

Title II of the ADA prohibits discrimination on the basis of disability. Specifically, Title II requires:

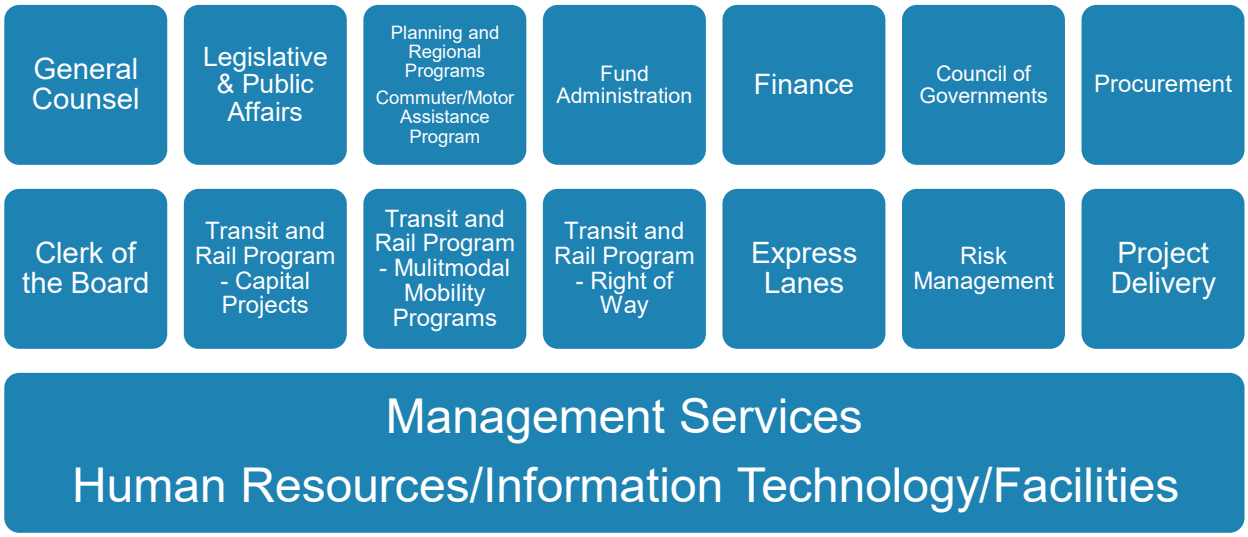
> *No qualified individual with a disability shall, on the basis of disability, be excluded from participating in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity (28 CFR Part 35.100 (a)).*

This report is divided into sections where these requirements apply. Each section includes the consultant's summary of findings after reviewing answers from the self-evaluation and recommendations for SBCTA to implement.

Findings

All SBCTA department heads (Figure 1) were asked a series of questions related to CFR Title 28 Part 35, Nondiscrimination on the Basis of Disability in State and Local Government Services, relative to their department.

Figure 1: List of SBCTA Divisions responding to Management Services for Self-Evaluation



Question #1 asked to SBCTA department heads:

Do policies, practices and procedures provide an equal opportunity for people with disabilities to participate in services, programs, and activities; that is, do policies not discriminate against people on the basis of disability? Please provide policy numbers and copies of these policies, practices, and procedures to identify if any policy modifications need to be implemented.

In summary, while most department heads recognize that SBCTA's policies, practices, and procedures are designed to provide equal opportunities for individuals with disabilities, many staff members expressed uncertainty regarding *how* these measures are implemented in practice.

Strategic Risk Management

SBCTA Policy #17000 provides a procedure to ensure claims against SBCTA are managed timely and effectively. The claim form is available on-line at https://sanbag-lfweb.sanbag.ca.gov/Forms/ClaimRequest. However, the claim form is not ADA accessible. The form is not appropriately tagged, with the ability to resize for the

visually-impaired. Therefore, the Plan recommends that SBCTA insert the following information on the website.

Recommendation:

Update the website with the following:

- Apply the same web content accessibility guidelines to the PDF Claim Forms

Question #2 and #3 asked

Are there circumstances in which the participation of a person with a disability would be excluded or restricted? If yes, are the exclusions or restrictions necessary to the operation of the program or to the safety of the other participants?

The division of SBCTA which raised concern was Support Services, which has the responsibility to respond to public records requests. The law (28 CFR §§ 35.105, 35.106, 35.107, and 35.160 - 164) does not spell out specific procedures regarding public record requests but describes how agencies must ensure that people with disabilities can access information and records equitably.

Recommendation:

Update the website with the following:

- If requests are only accepted online, the online form must be WCAG 2.1–compliant.
- Provide alternative submission methods: phone, email, in-person.
- Post instructions in accessible formats and include an ADA Coordinator contact.
- *Post the following statement on ADA webpage: "Public records will be provided in accessible formats upon request, in compliance with the Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act. Requesters with disabilities may submit public records requests through any standard channel (online, email, phone, in person) and may request records in formats such as large print, Braille, screen-reader accessible digital files, or audio. Please contact the ADA Coordinator at [contact info] to request accommodations."*

Question #4 asked:

Are there separate services, programs, or activities for people with disabilities or a class of people with disabilities?

Although most divisions within SBCTA do not provide direct services to the public, the general consensus recognized there are funding programs administered through SBCTA that are designed to assist those with disabilities, such as specialized transportation.

Question #5 asked:

Do all employees who contract with outside agencies, organizations or business know that the public entity's ADA obligations apply whether the public entity provides the service, program, or activity directly or contracts for it?

All divisions, outside of SBCTA's vanpool program, do not provide direct services to the public.

Question #6 asked:

Does the public entity notify each contractor of its responsibilities for providing contracted services in a nondiscriminatory manner?

Yes, each of SBCTA division heads confirm that they notify contractors of this responsibility.

Question #7 and #8 asked:

Does the public entity require assurances from contractors of their fulfillment of Title II requirements?

Are there procedures to ensure that contractors provide the services, programs, and activities in a nondiscriminatory manner consistent with the Title II requirements?

SBCTA division heads were confident that procedures and assurances were written into federal-funding contracts, however, they were not confident that assurances were written into non-federal contracts.

Question #9 asked:

Are employees and officials aware that the public entity is obligated to make a reasonable modification in policies, practices, or procedures if the modification is necessary for a person with a disability to participate?

SBCTA confirms that employees, Board, and Committee members are aware of this through the Equal Employment Opportunity policy (Policy #10100) when staff are hired.

Question #10 asked:

Are employees aware of:

*(**a**) the public entity must allow service animals to accompany people with disabilities in all areas where people without service animals are allowed to go?*

*(**b**) that only two questions may be asked: (1) is the dog or a miniature horse a service animal required because of a disability? And (2) what work, or task has the dog or miniature horse been trained to perform?*

*(**c**) they cannot ask about the person's disability, require medical documentation, require a special identification card or training documentation for the dog or miniature horse, or ask if the dog or miniature horse demonstrates its ability to perform the work or task?*

*(**d**) a person with a disability cannot be asked to remove his service animal from the premises unless (1) the dog or miniature horse is out of control and the handler does not take effective action to control it, or (2) the dog is not housebroken and in these circumstances employees must offer the person with the disability the opportunity to obtain goods or services without the animal's presence?*

*(**e**) a public entity must permit a miniature horse to accompany a person with a disability where reasonable? Assessment factors include, the size and weight, whether the horse is housebroken, and whether its presence compromise safety requirements?*

Although most SBCTA divisions are aware of service animals, many are not aware of the *specificity* of service animal policies. Therefore, this Plan recommends that SBCTA strengthen its training and procedures to ensure that employees understand Title II requirements related to service animals.

Recommendation:

Insert the following information into the on-boarding hiring process:

Allow Service Animals in All Areas

SBCTA must permit service animals to accompany individuals with disabilities in all areas where members of the public without service animals are normally allowed.

SBCTA should never restrict access based solely on the presence of a service animal.

Limit Inquiry to Two Questions Only

SBCTA staff should be trained to ask only the following questions if it is not obvious that the animal is a service animal: Is the dog or miniature horse a service animal required because of a disability? What work or task has the animal been trained to perform?

SBCTA cannot ask about the person's disability, request medical documentation, special identification cards, or training documentation for the animal, and cannot ask the animal to demonstrate its task.

Removal of Service Animals

SBCTA can only ask for a service animal to be removed under two circumstances: the animal is out of control, and the handler does not take effective action to control it, and if the animal is not housebroken.

Miniature Horses

SBCTA staff must reasonably accommodate miniature horses used as service animals, based on size and weight of the horse, whether the horse is housebroken, and whether the horse's presence compromises legitimate safety requirements.

Question #11 and #12 asked:

Are employees and officials aware of:

*(**a**) people with mobility disability may use wheelchairs, scooters, and manually-powered mobility aids, such as walkers, crutches, cans, braces, or other similar devices designed for use by individuals with mobility disabilities in any areas open to pedestrian use?*

*(**b**) people with mobility disabilities may use other power-driven mobility devices in any areas open to pedestrian use unless the public entity can demonstrate that the class of other power-driven mobility devices cannot be operated in accordance with legitimate safety requirements. Other power-driven mobility device means any mobility device powered by batteries, fuel, or other engines—whether or not designed primarily for use by individuals with mobility disabilities—that is used by individuals with mobility disabilities for the purpose of locomotion, including golf cars, electronic personal assistance mobility devices, or any mobility device designed to operate in areas without defined pedestrian routes, but that is not a wheelchair within the meaning of Title II.*

Some of the factors that go into determining "legitimate safety requirements" include size and speed of the device, the facility's design and characteristics (outdoor, indoor), and risk of harm to the immediate environment.

*(**c**) They may not ask about the nature and extent of the individual's disability but may ask an individual to provide a credible assurance that the mobility device is required because of the person's disability. Credible assurance includes a state-issued, disability parking placard or card, or other state-issued proof of disability or a verbal representation, not*

contradicted by observable fact, that the other power-driven mobility device is being used for a mobility disability.

Are employees and officials aware that the public entity may not place a surcharge on people with disabilities to cover the costs of measures, such as the provision of auxiliary aids or program accessibility, which are required to provide nondiscriminatory treatment?

Similar to the recommendation for Question #10, training on these specific points on mobility devices should be incorporated into the hiring process.

Recommendation:

Insert the following information into the on-boarding hiring nondiscrimination process:

Permit Use of Standard Mobility Aids

- Individuals with mobility disabilities may use wheelchairs, scooters, walkers, crutches, canes, braces, or similar manually-powered mobility aids in any areas open to pedestrian use.
- SBCTA must never restrict access to these devices in pedestrian areas.

Permit Use of Other Power-Driven Mobility Devices (OPDMDs)

- OPDMDs include any battery, fuel, or engine-powered mobility device used for locomotion by individuals with mobility disabilities
- Individuals may use OPDMDs in pedestrian areas unless the public entity can demonstrate that the device cannot be operated safely according to legitimate safety requirements.

Best Practice:

- Establish clear, written criteria for evaluating whether an OPDMD can be safely operated in a given area.
- Ensure staff understand that the default position is to allow use, with restrictions only when safety risk is demonstrable.

Credible Assurance vs. Disability Inquiry

- Staff may not ask about the nature or extent of the individual's disability.

- Staff may request credible assurance that the device is required due to the person's disability: state-issued disability parking placard or card

Staff Training and Awareness

- All staff should receive clear guidance that:
    - Individuals with mobility devices must be accommodated in pedestrian areas.
    - OPDMDs should only be restricted for legitimate safety reasons.
    - Inquiry into disability should be limited to credible assurance only.

Questions #13 through #21

These questions related to venues and public events, which do not apply to SBCTA. The questions are listed in Appendix C for reference.

Questions #22 through #24 asked:

Is information about the public entity's accessible services, activities, and facilities available to the public and to current and future program participants?

Are all public meetings and events held in accessible and safe locations?

Is there a notice on all public meeting announcements that auxiliary aids and services are made available as needed for participants with disabilities?

Many SBCTA staff are not aware of this requirement, however, they do note that the Santa Fe Depot, where many public meetings are held, is undergoing improvements to ensure ADA compliance.

Recommendation:

- Develop ADA web page, which is described more in-depth later in this study.
- It is recommended that SBCTA ensure that staff responsible for scheduling off-site meetings are fully aware of and comply with ADA requirements. This includes selecting locations along accessible routes, providing adequate clear floor space, arranging accessible room layouts, and ensuring integrated seating options, where reasonable and it does not cause undue burden.

Reasonable vs. Undue Burden / Fundamental Alteration

- Reasonable: Accommodation that enables access without fundamentally changing the nature of the program or imposing excessive cost.

- Undue Burden: Significant difficulty or expense relative to the entity's resources.

Question #25 asked:

Is there a policy in place regarding maintenance of accessible features?

SBCTA's Management Services division updates accessible features as part of its overall maintenance procedures but does not have a specific policy related to this. Therefore, this Plan recommends that SBCTA embed the following policy language into its maintenance plan:

Recommendation:

Purpose: It is the policy of SBCTA to ensure that all accessibility features required under the Americans with Disabilities Act (ADA) are maintained in proper working condition to provide continuous and reliable access for individuals with disabilities.

Policy:

1. Routine Inspection and Maintenance
    - All accessibility features at the Santa Fe Depot shall be inspected on an annual basis to ensure they remain functional.
2. Prompt Repair
    - Accessibility features that are damaged or found to be inoperable shall be removed from service or repaired promptly.
3. Documentation and Tracking
    - Reports of inoperable accessibility features from staff or the public shall be documented, tracked, and prioritized for resolution.

In addition to what is stated above, there are two Vertical Platform Lifts (VPL) within the San Bernardino Santa Fe Depot building. These lifts are not mentioned in the CASp study, but it is important to ensure the lifts are in working-order at all times. Information on this type of maintenance is detailed in the Transition Plan.

Question #26 asked:

Who provides auxiliary aids and services to people seeking accommodation under Title II?

Most departments indicated limited familiarity with this requirement, noting only that Public Affairs has occasionally provided accommodation in the past. Reference Procedure 10411.

Recommendation:

See Appendix B Public Meeting Accessibility Checklist for procedure

Question #27 and #28 asked:

Are SBCTA staff who have public contact trained or provided guidance regarding ADA requirements for full participation of individuals with disabilities including "disability" awareness, interactions with people with disabilities, disability civil rights laws, and disability etiquette?

By what means is training provided to SBCTA staff who have public contact regarding ADA requirements for full participation of individuals with disabilities including "disability" awareness, interactions with people with disabilities, disability civil rights laws, and disability etiquette?

Disability awareness refers to the understanding, knowledge, and sensitivity agency staff have regarding the needs, rights, and experiences of people with disabilities. It encompasses attitudes, behaviors, and communication that affect how staff interact with members of the public.

Throughout the self-evaluation, it is clear that SBCTA staff demonstrate a strong awareness of the needs, rights, and experiences of individuals with disabilities. While staff may not be familiar with every specific ADA policy, they consistently exhibit understanding, sensitivity, and respect toward the ADA community.

Question #29 through #32 ask questions related to maintenance of accessible features.

Are maintenance staff and other staff trained to identify access and safety issues?

Is there a system or plan in place to identify safety and access issues that can be used by maintenance staff to report and correct problems? If yes, please attach the plan.

How is access monitored during planning and construction of SBCTA projects?

Are any SBCTA programs, services or facilities operated from a registered historic site? If so, please list facility and if applicable: has SBCTA implemented alternative methods of achieving program accessibility?

SBCTA maintains a Safety Committee, and safety coordinators conduct regular facility inspections to ensure operational and environmental safety. These inspections include reviews of all ADA-related features, and the ADA Coordinator actively participates in Safety Committee meetings. However, it is important that SBCTA be transparent with the effort through the following recommendations:

Recommendation:

Insert real-time excerpt on the SBCTA ADA Plan website with following language:

"SBCTA maintains accessible features of facilities in operable working condition at its Santa Fe Depot. This includes elevators, lifts, tactile signage, accessible pathways, and public address systems. When features are temporarily out of service, SBCTA makes reasonable accommodations and notifies the public in advance whenever possible."

Question #33 asked:

When purchasing new equipment (including but not limited to communication and transportation equipment), how is it reviewed to ensure that equipment is accessible to people with disabilities?

SBCTA's vanpool program is a federally funded program that leases vehicles through a vendor. The vendor contract adheres to the federal certificates and assurances of the Federal Transit Administration (which states adherence to the ADA).

Questions #34 - #40 ask questions specifically about Emergency Management planning.

Does SBCTA have an emergency management plan that includes needs of people with disabilities?

Has SBCTA used the guidance published by the EEOC regarding lawful means of identifying employees who might need assistance during an emergency due to their disability?

SBCTA has an emergency management plan and details how to assist those with disabilities.

Are visual and audible warning signals installed in SBCTA facilities and buildings to notify all members of the public, including individuals with disabilities?

Has emergency management staff at all facilities been trained regarding a variety of events that might occur and impact people with disabilities?

Does SBCTA use the US Department of Justice guidance regarding disaster management? This can be located at ADA.gov.

Is the SBCTA ADA coordinator involved in the emergency plan creation, drills, and debriefings?

SBCTA has an emergency management plan and positively addresses the questions above.

Recommendation:

It is recommended that SBCTA, where applicable, includes the ADA Best Practices Tool Kit for State and Local Governments as part of their Emergency Management Plan, specifically *Chapter 7 Emergency Management under Title II of the ADA*.

ADA Best Practices Tool Kit for State and Local Governments

Questions #41 through #47 ask questions regarding the interview process and nondiscrimination. Specific questions can be found in Appendix C.

SBCTA's hiring procedures and interview packets cover all the necessary elements of ensuring nondiscrimination against those who may have a disability. SBCTA's Management Services contracts with NeoGov, an American software-as-a-service company that develops cloud-based human resource management tools used in the public sector.

Self-Evaluation of Effective Communication and Accessibility

ADA's Title II requires public entities to ensure that communication with people with disabilities is as effective as communication with others. Specific questions regarding effective communications asked through the self-evaluation can be found in Appendix C.

Findings

Auxiliary Aids and Services

When asked about auxiliary aids, all staff and frontline staff understand the need to obtain auxiliary aid if requested, however, they are not confident on *how* to obtain these materials or who is a point person for the procedure. Therefore, this Plan recommends the information below be included in the onboarding process.

Recommendation:

Receiving the Request:

- Brown Act Meetings: Send all requests immediately to the Clerk of the Board, who then forwards them to the ADA Coordinator. They will analyze the request to fulfill them together with the Office of Legislative & Public Affairs.
- Internal Public (Non-Brown Act) Meetings: Send requests directly to the Office of Legislative & Public Affairs for fulfillment.

- External Public Meetings/Events: Send requests to the Office of Legislative & Public Affairs for fulfillment.

Self-Evaluation of Website Accessibility

Under the ADA Section Title II, state and local governments must make their websites and digital services accessible to people with disabilities. The United States Department of Justice in April 2024 requires compliance with WCAG 2.1 AA standards (Web Content Accessibility Guidelines Version 2.1 Level AA) which ensures that public entities treat digital access the same way they treat physical access to facilities and programs.

SBCTA staff were asked a series of questions regarding website accessibility. Those specific questions can be found in Appendix C.

SBCTA's website is accessible, however, SBCTA lacks a policy stating the requirement of WVAG 2.1 AA for website accessibility and maintenance of the sites. Also there has been no real-world application of testing by those in the disability community. Further outreach initiatives to the ADA community and website accessibility are detailed later on in the Plan.

Recommendation:

Develop policy guidelines for SBCTA website design. An example guideline could be:

Purpose: This policy establishes the commitment of SBCTA to provide accessible websites, digital services, and online documents to ensure equal access for individuals with disabilities, in compliance with the Americans with Disabilities Act (ADA) Title II, Section 508 of the Rehabilitation Act, and the Web Content Accessibility Guidelines (WCAG) 2.1 Level AA. SBCTA is committed to ensuring that all digital information and services are accessible to the widest possible audience, including people with disabilities, by:

- Designing and maintaining websites that comply with WCAG 2.1 AA standards.
- Providing accessible digital documents, media, and online applications.

***Scope*:** This policy applies to all:

- SBCTA-operated websites, web applications, and online platforms.
- Third-party platforms or digital services purchased, contracted, or managed by SBCTA
- Digital documents (e.g., PDF, Word, Excel, PowerPoint) and multimedia content (audio, video).

ADA Title II Ruling:

- https://www.ada.gov/assets/pdfs/web-rule.pdf

Standards and Requirements: The Legislative and Public Affairs Department must:

1. Compliance with Standards
    - Ensure all websites and digital content conform to WCAG 2.1 AA standards.
    - Meet Section 508 requirements for electronic and information technology.
2. Accessible Development
    - Incorporate accessibility in the design, procurement, and implementation of websites and software.
    - Require vendors and contractors to comply with WCAG 2.1 AA and Section 508.
3. Accessible Content
    - Tag and structure documents for screen reader compatibility.
    - Provide captions and/or transcripts for audio and video materials.
    - Ensure color contrast, font readability, and navigable layouts.
4. Testing and Monitoring
    - Conduct automated scans and manual testing of websites on a regular basis.
    - Test with assistive technologies such as screen readers and keyboard-only navigation.
    - Address identified accessibility issues promptly.
5. Feedback and Support
    - Maintain an Accessibility Statement on all websites.
    - Provide a clear process for the public to report accessibility issues.
6. Training and Awareness
    - Provide regular accessibility training to IT staff.
    - Keep staff informed about changes in ADA, Section 508, and WCAG standards.

Roles and Responsibilities

- Legislative and Public Affairs Department: Implement and enforce this policy, maintain accessible infrastructure, and conduct testing.
- ADA Coordinator: Serve as the point of contact for accessibility requests and complaints.
- Vendors/Contractors: Deliver digital services and products that comply with accessibility standards.

Review and Updates

These guidelines will be reviewed at least once every two years, or sooner if accessibility standards, regulations, or agency operations change.

In addition to implementing these guidelines, the consultants on this project performed outreach to the ADA community to current test the SBCTA website and provide valuable, applicable feedback to this planning effort, which is described in detailed later on this Plan.

Self-Evaluation of ADA Administrative Requirements

Title II of the ADA requires that public entities undertake five administrative steps to promote implementation of the ADA. Those five administrative steps include:

- ADA Self-Evaluation
- Public notice that SBCTA does not discriminate on the basis of disability provided in print and audio formats
- Have ADA grievance procedure in place
- Identification of an ADA Coordinator
- ADA Transition Plan

SBCTA has completed an ADA self-evaluation. Public notice is posted; however, it is listed under Title VI and is not available in audio format. As part of this ADA Plan, creation of an ADA-specific website (and availability on various formats) will be implemented. As for the grievance procedure, there is not a separate one for ADA. Currently, there is only one available for Title VI. SBCTA does have an ADA Coordinator in place. A Transition Plan is created through this planning effort.

Self-Evaluation of Certified Access Specialist Program (CASp) Study – Santa Fe Depot

Inspection Date: April 12th, 2024

SBCTA owns eight (8) stations across the county as a 50% tenant in common with the local host city and three (3) stations entirely located within SBCTA's railroad right of way. For each of the stations, SBCTA has entered into cooperative agreements with the local host city wherein the local host city has accepted responsibility for the care and maintenance of the station(s) with the exception of the Santa Fe Depot, where SBCTA is both a tenant in common owner and occupies the property. SBCTA has agreed to manage the property through a property manager hired by SBCTA.

SBCTA Santa Fe Depot facility was constructed between 1918 and 1921, making it a "pre-ADA" facility. In February 2001, the Depot was certified on the National Registry of Historical Places. Between 2002 and 2004 the Depot was restored, preserving its historic Mission-Revival style architecture. Other SBCTA stations are co-owned by the hosting cities and ADA is the responsibility of the cities.

The Santa Fe Depot underwent a Certified Access Specialist Program (CASp) study in 2024, which identified areas of improvement for ADA compliance. The full report is located in Appendix E.

Fourteen (14) areas of the Santa Fe Depot were inspected.

- Brick Walkway - North
- Brick Walkway – South
- SBCTA Parking Lot – South
- SBCTA Parking Lot – East
- SBCTA Offices - Finance
- San Bernardino History and Railroad Museum
- Depot Lobby
- SBCTA Board Room
- SBCTA Offices – Transit and Rail
- Vacant 1st Floor Office Unit
- SBCTA Offices - West Depot
- SBCTA Offices - Mid Depot
- SBCTA Offices – Mezzanine
- SBCTA Offices - East Depot

Specific recommendations are listed in the Transition Plan where 135 Findings are identified. The Transition Plan provides the status report of those adjustments.

Self-Evaluation of Program Accessibility

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 component of a facility is not necessarily required to be accessible. This standard is known as "program accessibility" and is a key requirement under ADA Section Title II.

SBCTA is committed to ensuring that all of its programs, services, and activities are accessible to individuals with disabilities, consistent with ADA Title II requirements. Although the agency does not directly operate transit services, it oversees planning, funding, and regulatory programs that impact transit operations within the community. To meet program accessibility requirements, the agency provides accessible public meetings and workshops, ensures that written materials and reports are available in accessible formats upon request, and maintains effective communication channels. With that said, SBCTA understands there is always room for improvement and is consistently working towards compliance.

Additionally, the agency works with subrecipients and partner transit providers to ensure that funded projects and programs comply with ADA accessibility standards, promoting equitable access to transit for all community members.

Stakeholder Engagement

Engagement and communication with stakeholders have many aspects, beginning with identification of the stakeholders themselves, as they include many diverse residents of San Bernardino County, but including staff from local representative agencies as well. One regular means of interaction with ADA stakeholders is the Public and Specialized Transportation Advisory and Coordinated Council (PASTACC).

Public and Specialized Transportation Advisory and Coordination Council

The San Bernardino County Transportation Authority (SBCTA) appoints a special advisory body to provide guidance on transportation issues affecting older adults, persons with disabilities, and individuals with limited means. This body is formally known as the Public and Specialized Transportation Advisory and Coordination Council (PASTACC).

PASTACC advises SBCTA, through its Transit Committee, on matters related to social services transportation and specialized transit services within San Bernardino County. The Council places particular emphasis on the needs of individuals who are unable to utilize conventional fixed-route transit services available to the general public.

Through this established advisory forum, SBCTA's ADA Plan has been presented and discussed, facilitating meaningful stakeholder engagement. On December 8, 2025, PASTACC convened its quarterly meeting (see Appendix H for a list of attendees). During this meeting, the consulting team, in coordination with a representative from SBCTA Management Services, provided an overview of the ongoing ADA planning effort.

As part of the engagement process, the team sought collaboration with local ADA-related agencies to bring members of its disability community to attend a public meeting at the SBCTA Santa Fe Depot. The intent was to gain real-world insight into the lived experience of navigating and participating in a public meeting as an individual with a disability, thereby making recommendations to improve accessibility and inclusivity.

PASTACC includes regular participation from:

- Anthesis – agency who assists adults with disabilities
- Foothills AIDS Project – agency who assists individuals with HIV and AIDS
- VIP Solutions – agency who assists adults with disabilities for job placement
- OPARC – agency who assists adults with disabilities for work opportunities
- ICRC (Inland Empire Caregivers Resource Centers) – agency who assists old adults, living alone, with resources

SBCTA Website Accessibility

Agency representatives from PASTACC were asked to review SBCTA's website for accessibility. While the website meets baseline accessibility requirements, this exercise provided valuable insight into the practical, day-to-day user experience and highlighted opportunities for improvement.

- Blindness Support Services: Provides training services to those who are blind or have visual impairments to become more independent and adapt to the challenges they have.
- OPARC: OPARC exists to make training, employment, and social opportunities available for people with disabilities in the Inland Empire and Los Angeles County.
- Anthesis: To support adults with disabilities develop the skills and confidence to be contributing to members of the community.

Full evaluations can be found in Appendix G. However, outlined below are some highlighted comments from stakeholders:

- The SBCTA homepage is fully accessible
- HTML elements are properly labeled
- Twitter and YouTube links are tagged as graphics. These links are not properly labeled with alt text to identify which social media platform will be opened when using a screen reader.
- Text remains clear, well-spaced, and easy to read up to 200%.
- At 200%, users must locate and open the collapsed menu. This reduced discoverability presents a concern for users who rely on 200%.
- Some text for media describes the appearance of the image but not the purpose.
- PDF files downloaded for a specific project are accessible
- Page structure is mostly consistent, but some sub-pages differ slightly in layout.
- It is difficult to navigate using the keyboard only.

Attending a SBCTA Public Meeting

General Policy Committee Meeting February 11, 2026

Pete Benavidez, President and Chief Executive Officer of Blindness Support Services, Inc., attended the General Policy Committee meeting on February 11, 2026. Mr. Benavidez represents Blindness Support Services, an organization that assists individuals with visual impairments.

Below is a summary of his observations and recommendations regarding accessibility at the public meeting:

- Security Personnel Training: Security staff would benefit from enhanced disability awareness training to better accommodate individuals with low or no vision.
- Parking: Parking accommodation was satisfactory and did not present barriers to access.
- Public Comment Process: The public comment system should include accessible options for individuals with hearing impairments (e.g., written comment cards) and clear verbal queuing for individuals with visual impairments. Verbal cues were provided and were helpful.
- Restroom Accessibility: The men's restroom requires improvements to enhance accessibility; however, staff assistance was provided to help locate fixtures.
- Building Accessibility: The facility layout was generally accessible, with level surfaces and minimal issues related to stairs, grades, or slopes, allowing for easy navigation.

General Policy Committee Meeting February 11, 2026

Richard Startz, a member of the Rolling Start team who is paraplegic, attended the public meeting held at the Santa Fe Depot. He reported that access from the parking lot into the building was accessible, as was entry into the meeting room. He noted that attendees courteously rearranged chairs to ensure he could maneuver easily within the space. Security personnel also assisted by opening doors that did not have automatic push-button access.

Mr. Startz appreciated that he was not required to pass through the metal detector or remove personal items (such as belts or shoes), as this process can present challenges for individuals who use wheelchairs. Although he did not provide public comment, he indicated that he did not anticipate any barriers to doing so.

Overall, Mr. Startz found the meeting to be accessible for individuals who use wheelchairs.

Review of Final Plan

In compliance with ADA Title II § 35.105 (b), the following organizations representing individuals with disabilities listed below were notified of the release of the self-evaluation and draft Transition Plan. They were invited to participate by submitting comments when the document was released for public review and comment. Full comments can be found in Appendix F.

List of Organizations
Anthesis – adults w/disabilities
Blindness Support
Inland Regional Center – Developmentally Disabled Services
OPARC – adults w/disabilities
Rolling Start – Not for Profit Disability Organization
SB Department of Aging and Adult Services

On-Going Stakeholder Engagement

In addition to conducting an annual physical site visit and reviewing the agency's website, this report recommends that PASTACC serve as a practical, real-time advisory committee on disability training and awareness. It is further recommended that PASTACC provide a 30-minute annual training session to SBCTA staff, scheduled prior to one of its quarterly meetings. Additionally, PASTACC should present an annual summary of updates to the ADA Coordinator to ensure SBCTA maintains continued awareness and commitment to disability access and inclusion.

Establishing PASTACC as an active advisory body for disability training is important for several reasons. First, it provides SBCTA with ongoing, real-world insight from individuals who represent or advocate for people with disabilities, ensuring that accessibility considerations remain grounded in lived experience rather than only in regulatory compliance. Second, regular, short-format trainings prior to an existing quarterly meeting makes this approach both efficient and sustainable.

Finally, requiring PASTACC to present an annual overview of findings reinforces accountability and continuous improvement. This practice encourages SBCTA to regularly evaluate its policies, facilities, and programs through an accessibility lens, promoting a culture of proactive inclusion and awareness rather than reactive compliance.

Transition Plan

The self-evaluation identifies barriers in practices, policies, procedures, and physical barriers at the Santa Fe Depot. The modifications, corrections, or changes that are necessary to address the barriers are discussed in this ADA Transition Plan.

28 CFR § 35.150 (d) Transition plan requires:

(1) In the event that structural changes to facilities will be undertaken to achieve program accessibility, a public entity that employs 50 or more persons shall develop, within six months of January 26, 1992, a transition plan setting forth the steps necessary to complete such changes. A public entity shall provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the development of the transition plan by submitting comments. A copy of the transition plan shall be made available for public inspection.

(2) If a public entity has responsibility or authority over streets, roads, or walkways, its transition plan shall include a schedule for providing curb ramps or other sloped areas where pedestrian walks cross curbs, giving priority to walkways serving entities covered by the Act, including State and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas.

(3) The plan shall, at a minimum—

> *(i) Identify physical obstacles in the public entity's facilities that limit the accessibility of its programs or activities to individuals with disabilities.*
>
> *(ii) Describe in detail the methods that will be used to make the facilities accessible*
>
> *(iii) Specify the schedule for taking the steps necessary to achieve compliance with this section and, if the time period of the transition plan is longer than one year, identify steps that will be taken during each year of the transition period.*
>
> *(iv) Indicate the official responsible for implementation of the plan.*

In compliance with 28 CFR § 35.150 (d) (1)

- A copy of the transition plan was made available for public review and comment through issuance of this report. Notifications were issued for the public review period, and the documents are also posted on SBCTA's website.
- A description of the methods that will be used to make the facilities accessible.
- Schedule for taking the steps necessary to achieve compliance with ADA requirements.
- Since the time period of the transition plan is longer than one year, items have been scheduled to be addressed for each year of the transition period.
- The individual responsible for implementation of the ADA Transition Plan is SBCTA's ADA Coordinator, Colleen Franco.

Work Not Included

During the execution of the Self-Evaluation, certain aspects of the Santa Fe Depot are deemed historic and do not require an upgrade due to historic classification.

Noted specifically in the CASp report:

This building is also subject to the California Historical Building Code (CHBC) based upon it being a registered Qualified Historical Building. The purpose of the CHBC is to provide alternative regulations to facilitate access and use by persons with disabilities to and throughout the facilities. Some items in this report will mention the CHBC because the integrity of any historically significant element of the property, whether that be original brick pavers or doors for example, shall not be impacted by accessibility improvements with some exceptions. This shall not apply to any renovated areas of the property that are no longer original and preserved.

Specific Findings Not to Be Updated

Finding 1: The accessible route on the site has running slopes greater than 5%.



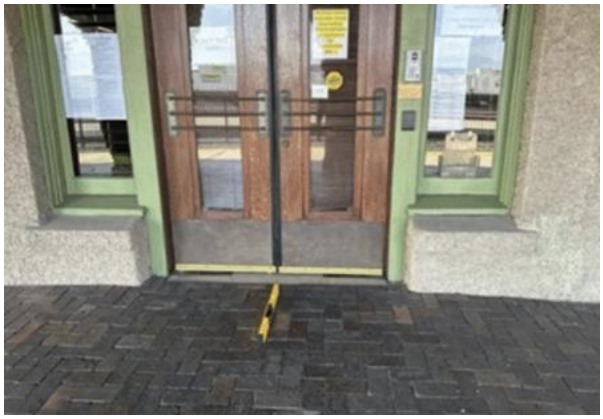
CASp Recommendations:

It shall be assessed by a contractor if it is possible to protect the brick pavers while adjusting the overall slope of the brick pavers to be less than 5%. If it is not achieved without hindering the integrity of the historical pavers, then a sign should be provided on both sides of the pillar pointing towards the other accessible route options that are less than 5% slope.

Action by SBCTA:

SBCTA will provide signage on both sides of the pillar pointing towards the other accessible route options that are than 5% slope.

Finding 2: The landing at the Suite 150 entrance doors exceeds 2% slope.



CASp Recommendations:

Provide directional signage to an accessible entrance that is within 200 feet.

Action by SBCTA:

SBCTA will provide signage to an accessible entrance within 200 feet.

Finding 3: The button to request access into the LAFCO office is positioned too high.



CASp Recommendations:

Re-locate notification button or provide an additional button with a compliant height.

Action by SBCTA:

Finding 4: The threshold at the LAFCO door has a vertical change greater than 1/4 inch. The threshold at a doorway shall be no higher than 1/2 inch. Changes in level between 1/4 inch and 1/2 inch must be beveled at 1:2 or less. The maximum vertical rise shall be ¼ inch.



CASp Recommendation:

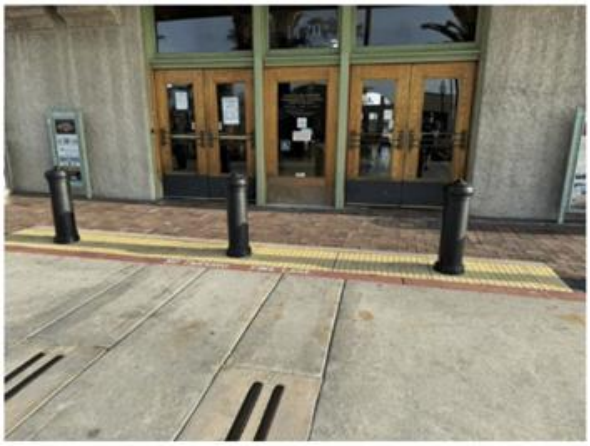
This would only be required if entrance is used by the public or if there are any employees with disabilities hired. If it is required based on either of those factors, then due to the age of the threshold it should be corrected to the greatest extent possible without impacting the integrity of the historical pavers. Alternatively, if the pavers cannot be protected then the next equivalent facilitation would be providing a compliant notification system and a sign with the ISA symbol and that states "Ring for Assistance" or similar so that

assistance may be provided without the customer needing to enter.

Action by SBCTA:

SBCTA will provide a compliant notification system and a sign with the ISA symbol and that states "Ring for Assistance."

Finding 5: Even though the detectable warning surface is not 36" wide as required by CHBC 11B-705.1.2.5, doing so would require the removal of historically significant brick pavers which would not be allowed under the California Historical Building Code.



CASp Recommendation:

This should not be required to correct due to the impact of removing historical pavers. In the event renovation is done to the front, they will need to comply with the current code and likely require 36" wide detectable warning surfaces.

Action by SBCTA:

SBCTA will not be widening the warning surface at this time.

Finding 7: The accessible path of travel has cross slopes greater than 2%. Surface cross slopes shall not exceed one unit vertical in 48 units horizontal (2-percent slope). When the slope in the direction of travel of any walk exceeds 1 unit vertical in 20 units horizontal (5-percent slope), it must be constructed as a ramp.

CASp Recommendation:

It shall be assessed by a contractor if it is possible to protect the brick pavers while raising the sunken brick pavers in order to create a 2% cross slope along the walkway. It shall not be required to fix if it would impact on the integrity of the historical brick pavers as required by the California Historical Building Code.



Action by SBCTA

SBCTA will not be correcting this at this time

Finding 51: The transaction counter is too high. The counter height shall be 36 inches maximum.

CASp Recommendation:

While transaction counters must be 36" high for the ADA (34" per the CHBC 11B), this counter has historical significance and should not be required to comply with this requirement. Instead, an equivalent facilitation should be provided by ensuring that a person in a wheelchair can have a menu visible to them from the front and make the transaction for goods sold using a wireless card reader that they can use from their wheelchair, mobile pay, or provide services outside of the counter such as the employee coming to the front to provide the goods, services, and transaction. A bell with a "Ring for Assistance" sign placed on the front wall of the counter may be a worthwhile installation as well in order to ensure staff



are able to see if a person in a wheelchair would like to make a purchase.

Action by SBCTA:

SBCTA will ensure a menu is visible, ensure a card reader is available, and bell is available to ring.

Finding 69: The stairway is not the minimum width. Stairways shall have a clear width of 48 inches minimum between handrails.



CASp Recommendation:

The stairs are not a compliant width; however, this is an existing stairway that is part of the historical significance of the building and should not be required to meet this requirement. A compliant multi-story access route is also already provided by means of an elevator.

Action by SBCTA

None.

Finding 70: The treads are not the minimum required depth. Stair treads shall be no less than 11 inches deep, measured from riser to riser.

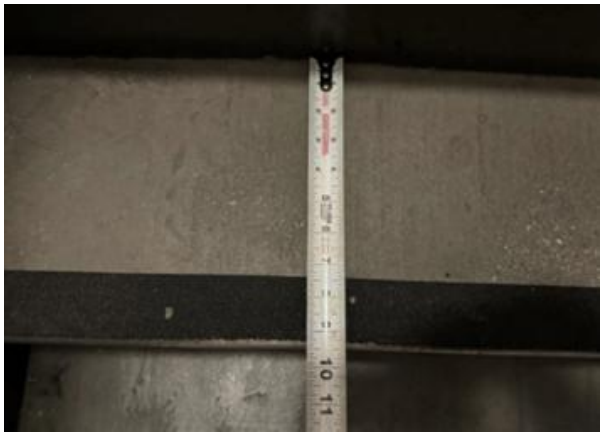
CASp Recommendation:

The stairs are not a compliant width; however, this is an existing stairway that is part of the historical significance of the building and should not be required to meet this requirement. A compliant multi-

story access route is also already provided by means of an elevator.

Action by SBCTA

None.



Work Included

This report will assist SBCTA with meeting the functional goals and legal requirements mandated by the Rehabilitation Act and ADA Title II for the Santa Fe Depot listed in Appendix E.

At the time of this report, the following charts below details the status of each finding found through the CASp assessment based on category.

Categories included:

- Brick Walkways
- Parking
- Offices (Finance, Transit and Rail, West Depot, Mid Depot, East Depot, Mezzanine)
- Railroad Museum
- Lobby
- Boardroom

Table 1 Completed Work by SBCTA

Signs	Finding	Action
Cosmetic	4	International Symbol for Accessibility
Cosmetic	6	International Symbol for Accessibility
Cosmetic	19	Tactile
Cosmetic	21	Tactile
Cosmetic	26	Corrective
Cosmetic	27	Corrective
Cosmetic	44	Corrective/Tactile
Cosmetic	45	Corrective/Tactile
Cosmetic	48	Corrective/Tactile
Cosmetic	52	Corrective/Tactile
Cosmetic	71	Corrective/Tactile
Cosmetic	72	Corrective/Tactile
Cosmetic	73	Corrective/Tactile
Cosmetic	85	Corrective/Tactile
Cosmetic	86	Assisted Listening Devices
Cosmetic	87	Sign/Accessible
Cosmetic	89	Corrective/Tactile
Cosmetic	93	Corrective/Tactile
Cosmetic	96	Corrective/Tactile
Cosmetic	97	Corrective/Tactile

Cosmetic	100	New sign
Cosmetic	101	New sign
Cosmetic	104	New sign
Cosmetic	111	Corrective/Tactile
Cosmetic	114	New sign
Cosmetic	115	New sign
Cosmetic	118	New sign
Cosmetic	129	Corrective/Tactile
Cosmetic	134	New sign

Future work budgeted and completed in FY26 and FY27

Parking Findings

Parking	Finding	Action
Number of required van accessible stalls is not provided.	8	Corrected October 2025
The running slope of the accessible parking stall has slopes that exceed 2%.	9	Corrected October 2025
The parking stall contains abrupt edges and surface irregularities over a ¼ inch vertical.	10	Corrected October 2025
The striping and marking for the accessible parking stall, loading/unloading access aisle are dilapidated and in need of repair and/or maintenance	11	Corrected October 2025
The access aisles are not outlined with a blue border around their entirety.	12	Corrected October 2025
The strip is missing at the left side of the left parking stall which identifies its border. Vehicle	13	Corrected October 2025

spaces shall be marked to define the width and shall have an adjacent access aisle.		
The stripe is missing at the right side of the right parking stall which identifies its border.	14	Corrected October 2025
The detectable warnings at the blended transition do not extend 36 inches in the direction of travel.	15	Corrected October 2025
The strip is missing at the left side of the left parking stall which identifies its border. Vehicle spaces shall be marked to define the width and shall have an adjacent access aisle.	16	Corrected October 2025
The access aisle is not outlined with a blue border	17	Corrected October 2025
There are no van accessible parking stalls.	18	Corrected October 2025

Door Findings

Doors/Door Pressure/Door Handles	Finding	Action
The door exceeds the maximum allowable opening force.	20	Corrected 2026
The door operating hardware to the conference room requires tight grasping, pinching or twisting of the wrist to operate.	23	Corrected 2026
Both restroom doors exceed the maximum allowable opening force	28	Corrected September 2025
In the men's restroom, the door operating hardware requires tight grasping, pinching or twisting of the wrist to operate.	29	Corrected 2026
The station entrance doors exceed the maximum allowable opening force.	49	Corrected September 2025
The doors between the interior of the train station and the platform area exceed the maximum allowable opening force except for the left door leaf at the middle set of double doors.	50	Corrected September 2025
The door at the men's restroom has a door stop which prevents it from having a smoother surface than the bottom.	53	To be removed in 2026

The door exceeds the maximum allowable opening force.	74	Budgeted and Corrected 2026
The door exceeds the maximum allowable opening force.	88	Budgeted and Corrected 2026
The door has a locking mechanism that requires tight grasping, pinching or twisting of the wrist.	94	Budgeted and Corrected 2026
The doors to the restrooms exceed the maximum allowable opening force. Interior doors should have a maximum opening force of 5 pounds.	105	Corrected September 2025
The men's non-accessible restroom door exceeds the maximum allowable opening force. Interior doors should have a maximum opening force of 5 pounds.	119	Corrected September 2025
The door for the wheelchair lift exceeds the maximum allowable opening force. Interior doors should have a maximum opening force of 5 pounds.	126	Corrected September 2025

Audible Findings

Audible	Finding	Action
There is no assistive listening system in the assembly area.	22	To be budgeted and corrected in 2027
There is no assistive listening system in the assembly area.	66	To be budgeted and corrected in 2027
The microphone and controls for the microphone are out of the maximum allowable reach range for a side approach.	67	To be budgeted and corrected in 2027
There is no assistive listening system in the assembly area.	95	To be budgeted and corrected in 2027
There is no assistive listening system in the assembly area.	112	To be budgeted and corrected in 2027
There is no assistive listening system in the assembly area.	133	To be budgeted and corrected in 2027

Height/Width Findings

Height/Width Adjustments	Finding	Action
The microwave and toaster oven are positioned too high.	24	To be adjusted in 2026
The maneuvering clearance at the men's restroom door does not meet the minimum required dimensions.	25	To be adjusted in 2026
The fire extinguisher is positioned too high.	40	To be adjusted in 2026
The geometric symbol for the room is not within the allowable height range above the finish floor.	75	To be adjusted in 2026
The top of the sink is above the allowable height requirement.	82	To be budgeted and corrected in 2027
The latches for the first aid box are positioned too high.	83	To be adjusted in 2026
The door operating hardware to the Lunchroom (Room 58) requires tight grasping, pinching or twisting of the wrist to operate.	84	To be adjusted in 2026
The device (alarm) is positioned too high.	92	To be adjusted in 2026
The paper towel dispenser's operation mechanism is too high off the floor.	131	To be adjusted in 2026
The soap dispenser is mounted too high.	132	To be adjusted in 2026
The element projects more than 4 inches into the circulation path.	135	To be adjusted in 2026

Restroom Findings

Restrooms	Finding	Action
In the men's restroom the water and drainpipes under the lavatory are not adequately insulated.	30	To be budgeted and corrected in 2027
In the women's restroom the top rim of the lavatory is too high.	31	To be budgeted and corrected in 2027

In both restrooms the mirror is mounted above the allowable height above the lavatory and/or counter.	32	To be adjusted in 2026
In both restrooms the soap dispenser is mounted too high.	33	To be adjusted in 2026
In the men's restroom the rim of the urinal is above the maximum allowable height.	34	To be budgeted and corrected in 2027
The urinal is located in an area the does not provide the required clear floor space for a front approach.	35	Cannot do based on how urinals were designed.
In the women's restroom the compartment door is not self-closing	36	To be adjusted in 2026
In both restrooms the toilet seat is not located within the range off the floor.	37	To be budgeted and corrected in 2027
In both restrooms the rear grab bar is too high.	38	To be budgeted and corrected in 2027
In both restrooms the toilet is not located within the range allowed from the side wall or partition.	39	Cannot do based on how toilets were designed.
In both restrooms the water and drainpipes under the lavatory are not adequately insulated.	54	To be budgeted and corrected in 2026
In the men's restroom the paper towel dispenser's operation mechanism is too high off the floor.	55	To be adjusted in 2026
In both restrooms the accessible compartment door is not self-closing.	56	To be adjusted in 2026
In the men's restroom the side grab bar is missing	57	To be budgeted and corrected in 2026
In the men's restroom the toilet seat cover dispenser is mounted too high and is not located in an accessible location.	58	To be adjusted in 2026
In both restrooms the toilet is not located within the range allowed from the side wall or partition.	59	Cannot do based on how toilets were designed.

In the men's restroom the coat hook is not mounted within the required range.	60	To be adjusted in 2026
In both restrooms the door locking hardware exceeds maximum height requirements.	61	To be budgeted and corrected in 2026
At the women's restroom the clear floor space for the push activation button is obstructed by the barrier posts.	62	To be adjusted in 2026
In the women's restroom the soap dispensers are mounted too high.	63	To be adjusted in 2026
In the women's restroom accessible compartment door exceeds the maximum allowable opening force.	64	To be budgeted and corrected in 2026
The sanitary napkin disposal units opening is not located correctly between the rear wall and the toilet paper dispenser.	65	To be adjusted in 2026
The restroom door operating hardware requires tight grasping, pinching or twisting of the wrist to operate.	76	To be adjusted in 2026
The water and drainpipes under the lavatory are not adequately insulated.	77	To be budgeted and corrected in 2026
The soap and sanitizer dispenser is mounted too high.	78	To be adjusted in 2026
The lavatory projects into the clear floor space required for the toilet.	79	Cannot do based on how toilets were designed.
The maneuvering space in front of the toilet is not a minimum 48 inches deep due to the storage shelves.	80	To be adjusted in 2026
The soap and paper towel dispensers, and the first aid kit are not accessible because it is located over an obstruction greater than 34 inches tall.	81	To be adjusted in 2026
The restroom door exceeds the maximum allowable opening force.	98	To be budgeted and corrected in 2026
The water and drainpipes under the lavatory are not adequately insulated.	99	To be budgeted and corrected in 2026

The wall signs at both non-wheelchair accessible restrooms are mounted too low.	102/103	To be budgeted and corrected in 2026
In the men's accessible restroom, the top rim of the lavatory is too high.	106	To be budgeted and corrected in 2027
In the men's accessible restroom, the mirror is mounted above the allowable height above the lavatory and/or counter.	107	To be budgeted and corrected in 2027
In both accessible restrooms the toilet seat is not located within the range allowed off the floor.	108	To be budgeted and corrected in 2027
In both accessible restrooms the toilet paper dispenser is not correctly located in front of the toilet.	109	To be budgeted and corrected in 2026
In the women's accessible restroom, the toilet seat cover dispenser is mounted too high.	110	To be adjusted in 2026
The wall sign is mounted too low.	116	To be adjusted in 2026
The wall sign at the accessible restroom is mounted too low.	117	To be adjusted in 2026
In the accessible restroom the paper towel dispenser's operation mechanism is too high off the floor.	120	To be adjusted in 2026
In the accessible restroom the mirror is mounted above the allowable height above the lavatory and/or counter.	121	To be adjusted in 2026
In the accessible restroom the rear grab bar is too high.	122	To be adjusted in 2026
In the accessible restroom the toilet paper dispenser is not correctly located in front of the toilet.	123	To be adjusted in 2026
In the accessible restroom the toilet seat cover dispenser is mounted too high and is not located in an accessible location.	124	To be adjusted in 2026
In the accessible restroom the width of the toilet room is too narrow.	125	Cannot do due to infrastructure constraints

Surface and Space Findings

Surfaces/Spaces	Finding	Action
The floor mat at the door is secured in place.	41	To be adjusted in 2026
The route of travel does not provide a minimum width of 36 inches	46	To be adjusted in 2026
The sales and service counter is higher than 34 inches above the finished floor.	47	This will not be used as service counter and will remain in place.
The floor mat at the door is not secured in place.	90	To be adjusted in 2026
A parallel clear floor space is not provided at the refrigerator/freezer due to the swing of the door being on the opposite side.	91	To be adjusted in 2026
There are no accessible tables.	130	To be budgeted and corrected in 2026

Stairs	Finding	Action
The enclosed stairway misses the required tactile floor identification signs.	68	To be budgeted and corrected in 2026
The stairs are missing a contrasting stripe on the upper approach and/or the lower tread.	113	To be budgeted and corrected in 2026
The stairs are missing a contrasting stripe on the upper approach and/or the lower tread.	127	To be budgeted and corrected in 2026
The handrail does not have the required extension at the top of the stair flight.	128	To be budgeted and corrected in 2026





There are two Vertical Platform Lifts (VPL) within the San Bernardino Depot building. These lifts are not mentioned in the CASp study, but it is very important to ensure the lifts are in working-order at all times. The two VPLs are pictured to the left.

The American Society of Mechanical Engineers (ASME) establishes the minimum safety requirements for the design, construction, installation, operation, inspection, testing, maintenance, and repair of Vertical Platform Lifts (VPLs), Inclined Platform Lifts (IPLs), and Stairway Chairlifts. These devices are used primarily by individuals with mobility impairments to move between levels where a full elevator is not feasible. The specific section regarding this standard is ASME A18.1. Their recommendations for maintenance are stated below.

Frequency	Tasks
Monthly/Quarterly	Check for smooth operation, noises, jerks Inspect door interlocks and gates Verify safety sensors, emergency stop, and platform barrier operation
Semi-Annual/Annual Certificated Technician	Lubricate mechanical parts Test safety switches, brakes, and limit controls Inspect belts, chains, or hydraulic systems Check electrical systems and emergency lowering functions
After Any Repairs or Power Failures	Conduct full safety inspection and test ride

Appendix A: Self Evaluation

Appendix B: Draft Public Meeting Accessibility Checklist

PUBLIC MEETING ACCESSIBILITY
checklist

MEETING NAME:_____ **STAFF RESPONSIBLE:**_____
DATE: **LOCATION:**

PLANNING & NOTICE

- ☐ MEETING LOCATION IS PHYSICALLY ACCESSIBLE (RAMPS, DOORS, RESTROOMS, SEATING).
- ☐ ALTERNATIVE ACCESSIBLE LOCATION OR VIRTUAL OPTION ARRANGED IF NEEDED.
- ☐ ACCESSIBILITY STATEMENT INCLUDED IN ALL MEETING NOTICES.
- ☐ NOTICES POSTED IN MULTIPLE FORMATS: WEBSITE, SOCIAL MEDIA, PHYSICAL BOARDS, NEWSPAPERS.
- ☐ MEETING AGENDA AND HANDOUTS PREPARED IN ACCESSIBLE FORMATS

AUXILIARY AIDS & SERVICES

- ☐ REQUESTS FOR ACCOMMODATIONS LOGGED WITH NAME, CONTACT, MEETING DATE, AND TYPE OF AID.
- ☐ REQUESTER CONTACTED TO CONFIRM ACCOMMODATIONS.
- ☐ ARRANGEMENTS MADE FOR REQUESTED SERVICES:
  - SIGN LANGUAGE INTERPRETER
  - CART/CAPTIONING
  - ASSISTIVE LISTENING DEVICE
  - ALTERNATIVE FORMAT MATERIALS

DAY OF MEETING

- ☐ ACCESSIBLE SEATING AND ENTRANCES VERIFIED.
- ☐ AUXILIARY DEVICES/SERVICES SET UP IN CORRECT LOCATION.
- ☐ STAFF BRIEFED ON ACCESSIBILITY PROCEDURES AND POINTS OF CONTACT.

DURING THE MEETING

- ☐ ANNOUNCE AVAILABLE ACCOMMODATION.
- ☐ PROVIDE INSTRUCTIONS FOR REQUESTING REAL-TIME ASSISTANCE.

Appendix C: Remaining Questions from Self-Assessment

Q13 - Are tickets for accessible seats sold during the same hours; through the same methods of purchase (by telephone, on site, through a website, or through third-party vendors); and during the same stages of sales (pre-sales, promotions, general sales, wait lists, or lotteries) as non-accessible seats?

Q14 – If accessible seating is not available in areas of the venue with lower prices, is lower priced accessible seating available in higher priced locations?

Q15 - Do venues and third-party sellers provide the same information about accessible seats as provided about non- accessible seats?

Q16 - Can ticket sellers describe accessible seating in enough detail to permit the purchaser to determine if a seat meets his or her needs?

Q17 - Do ticket sellers know that people purchasing a ticket for a wheelchair space may purchase up to three additional seats for their companions as close as possible to the wheelchair space and that these companion seats may include wheelchair spaces?

Q18 - Do ticket sellers know that unsold accessible seats may be released and sold to members of the general public in only one of three circumstances: when all non-accessible seats have been sold (excluding luxury boxes, club boxes, suites, and seats the venue holds back when declaring a sell-out); or when all non-accessible seats in a particular seating section have been sold; or when all non-accessible seats in a particular price category have been sold?

Q19 - If the venue permits patrons to give or sell their tickets to others, does the venue know that the same right must be extended to patrons with disabilities and that those tickets may be sold to someone who does not have a disability?

Q20 -Do ticket sellers know that for single event tickets, venues may ask purchasers to state that they require, or are purchasing tickets for someone who requires, the features of an accessible seat?

Q21 -Do ticket sellers know that tickets for series of events, purchasers may be asked to attest in writing that they require, or are purchasing tickets for someone who requires, the features of an accessible seat?

Employment Practices asked during the site evaluation

Q41 Do employment practices comply with all applicable nondiscrimination requirements, including section 504 of the Rehabilitation Act and the ADA regulation issued by the Equal Employment Opportunity Commission?

Q42 Are the interview/selection panel members trained regarding disability awareness and interactions with people with disabilities?

Q43 Is reasonable accommodation offered, as needed for people with disabilities during interview/selection?

Q44 Who provides reasonable accommodations to applicants and employees under ADA Title I and II regulations and CA Government Code12926? Please include Name, Position, and Contact information.

Q45 Please share all accessibility policies, procedures and guidelines, verbal or written, that you have in place. Please attach a copy.

Q46 Is there an anti-disability harassment policy?

Q47 Does SBCTA have a policy in place that prohibits discrimination against people who formerly used drugs?

Effective Communication asked during the site evaluation

Q1. Does the public entity know how to provide the following for people who are deaf or hard of hearing?

a) sign language, oral, and cued speech interpreters

b) video remote interpreting services

c) computer assisted real-time transcription (CART) services

d) assistive listening devices

e) open and close captioning of videos

f) real-time captioning of television programs

Website Accessibility asked during the site evaluation

Q1. Is there a policy that the public entity's webpages will be accessible, that is, in compliance with the W3C Web Content Accessibility Guidelines (WCAG) 2.0 or Section 508 Standards?

Q2. Are the staff and contractors who are responsible for webpage and content development aware of the policy?

Q3. Are the staff and contractors responsible for webpage and content development knowledgeable about these standards?

Q4. Has the website been tested for compliance with either of these standards?

Q5. If yes, have people with disabilities who use screen reading software and other assistive technology participated in the evaluation?

Q6. Is there a plan for making the existing web content accessible?

Q7. Is there a plan for making future web content accessible?

Appendix D: SBCTA Accessibility language for all public meetings

Meeting Procedures and Rules of Conduct Meeting Procedures - The Ralph M. Brown Act is the state law which guarantees the public's right to attend and participate in meetings of local legislative bodies. These rules have been adopted by the Board of Directors in accordance with the Brown Act, Government Code 54950 et seq., and shall apply at all meetings of the Board of Directors and Policy Committees.

Accessibility & Language Assistance - The meeting facility is accessible to persons with disabilities. A designated area is reserved with a microphone that is ADA accessible for public speaking. A designated section is available for wheelchairs in the west side of the boardroom gallery. If assistive listening devices, other auxiliary aids or language assistance services are needed in order to participate in the public meeting, requests should be made through the Clerk of the Board at least three (3) business days prior to the Board meeting. The Clerk can be reached by phone at (909) 884-8276 or via email at clerkoftheboard@gosbcta.com and the office is located at 1170 W. 3rd Street, 2nd Floor, San Bernardino, CA. Service animals are permitted on SBCTA's premises. The ADA defines service animals as dogs or miniature horses that are individually trained to do work or perform tasks for people with disabilities. Under the ADA, service animals must be harnessed, leashed, or tethered, unless these devices interfere with the service animal's work, or the individual's disability prevents using these devices. In that case, the individual must maintain control of the animal through voice, signal, or other effective controls.

Accesibilidad y asistencia en otros idiomas - Las personas con discapacidad pueden acceder a la sala de reuniones. Se reserva una zona designada con un micrófono accesible que cumple con los requisitos de la ADA para hablar en público. Una sección designada está disponible para sillas de ruedas en el lado oeste de la galería de la sala de reuniones. Si se necesitan dispositivos de ayuda auditiva, otras ayudas auxiliares o servicios de asistencia en otros idiomas para participar en la reunión pública, las solicitudes deben presentarse al Secretario de la Junta al menos tres (3) días hábiles antes de la fecha de la reunión de la Junta. Puede comunicarse con el Secretario llamando al (909) 884-8276 o enviando un correo electrónico a clerkoftheboard@gosbcta.com. La oficina se encuentra en 1170 W. 3rd Street, 2nd Floor, San Bernardino, CA. Los animales de servicio están permitidos en las instalaciones de SBCTA. La ADA define a los animales de servicio como perros o caballos miniatura que son entrenados individualmente para hacer trabajo o realizar tareas para personas con discapacidades. Según la ADA, los animales de servicio deben tener un arnés o ser atados, a menos que estos dispositivos interfieran con el trabajo del animal de servicio, o que la discapacidad de la persona impida el uso de estos dispositivos. En ese caso, la

persona debe mantener el control del animal a través de su voz, señales u otros controles efectivos.

Agendas – All agendas are posted at www.gosbcta.com/board/meetings-agendas/ at least 72 hours in advance of the meeting. Staff reports related to agenda items may be reviewed online at that web address. Agendas are also posted at 1170 W. 3rd Street, 1st Floor, San Bernardino at least 72 hours in advance of the meeting.

Agenda Actions – Items listed on both the "Consent Calendar" and "Discussion" contain recommended actions. The Board of Directors will generally consider items in the order listed on the agenda. However, items may be considered in any order. New agenda items can be added and action taken as provided in the Ralph M. Brown Act Government Code Sec. 54954.2(b).

Closed Session Agenda Items – Consideration of closed session items excludes members of the public. These items include issues related to personnel, pending litigation, labor negotiations and real estate negotiations. Prior to each closed session, the President of the Board or Committee Chair ("President") will announce the subject matter of the closed session. If reportable action is taken in closed session, the President shall report the action to the public at the conclusion of the closed session.

Public Testimony on an Item – Members of the public are afforded an opportunity to speak on any listed item, except Board agenda items that were previously considered at a Policy Committee meeting where there was an opportunity for public comment. Individuals in attendance at SBCTA who desire to speak on an item may complete and turn in a "Request to Speak" form, specifying each item an individual wishes to speak on. Individuals may also indicate their desire to speak on an agenda item when the President asks for public comment. When recognized by the President, speakers should be prepared to step forward and announce their name for the record. In the interest of facilitating the business of the Board, speakers are limited to three (3) minutes on each item. Additionally, a twelve (12) minute limitation is established for the total amount of time any one individual may address the Board at anyone meeting. The President or a majority of the Board may establish a different time limit as appropriate, and parties to agenda items shall not be subject to the time limitations. Any individual who wishes to share written information with the Board may provide 35 copies to the Clerk of the Board for distribution. If providing written information for distribution to the Board, such information must be emailed to the Clerk of the Board, at clerkoftheboard@gosbcta.com, no later than 2:00 pm the day before the meeting in order to allow sufficient time to distribute the information. Written information received after the 2:00 pm deadline will not be distributed. Information provided as public testimony is not read into the record by the Clerk. Consent Calendar items can be pulled at Board member request and will be

brought up individually at the specified time in the agenda. Any consent item that is pulled for discussion shall be treated as a discussion item, allowing further public comment on those items.

Appendix E CASp Engineering Plan

Appendix F: Public Feedback

From: Almilli, Lisa <lalmilli@cityofchino.org>
Sent: Monday, June 15, 2026 8:29 AM
To: AMMA Transit Planning <mail@ammatransitplanning.com>
Subject: Comment on SBCTA's ADA Self-Evaluation and Transition Plan

Hello,

Just more of a grammar comment: The title should be "Americans with Disabilities Act (ADA) Plan" (not Disability).

Thank you,

Lisa Almilli, MA, ADAC, CASp

Citywide Accessibility Coordinator

Development Services, Accessibility Division

City of Chino

13220 Central Avenue

Chino, CA 91710

Tel: 909-334-3524

From: Bogumil <elizabeth.bogumil@gmail.com>
Sent: Tuesday, July 7, 2026 8:00 PM
To: AMMA Transit Planning <mail@ammatransitplanning.com>
Cc: Inland Coalition on Aging <info@inlandaging.org>
Subject: Feedback: ADA Draft Self-Evaluation and Transition Plan

Hello,

On behalf of the Inland Coalition on Aging, we are providing feedback on the ADA Draft Self-Evaluation and Transition Plan as it connects to the Inland Empire Master Plan for Aging. As one ages, the rate of disability increases. Thus, aging and disability go hand-in-hand. Please find below our feedback, organized into a spreadsheet.

If you have any questions, we would love to continue this dialogue. Thank you and the AMMA team so much for the work you're doing!

Wishing you a day of curiosity,

Elizabeth Bogumil

Ph.D. Candidate | Sociology | UC Riverside

M.A. | Sociology | CSU Northridge

Consultant

Gap Area	SBCTA ADA Plan (Current Coverage)	SBCTA Pages	Action to Bring SBCTA ADA Plan in Line with IE Master Plan for Aging Goals	IE-MPA Goal/Theme
Transportation beyond ADA compliance	Focuses on accessible facilities, meetings, websites, and legal ADA requirements.	Throughout; especially pp. 5–22	Address expanding transportation options, mobility networks, or transportation independence. IE-MPA recommends a comprehensive mobility system beyond ADA minimum standards.	Goal 2 (ICA)
Door-through-door assistance	No discussion.	Not addressed	IE-MPA recommends door-to-door and door-through-door transportation assistance for older adults and people with disabilities requiring additional support beyond curb-to-curb service.	Goal 2 (pp. 20–22 IE-MPA) (ICA)
Volunteer driver programs	Not addressed.	Not addressed	IE-MPA recommends volunteer driver reimbursement and community transportation options, particularly in rural areas.	Goal 2 (ICA)
Rural transportation	ADA accessibility applies uniformly but rural mobility challenges are not discussed.	Not addressed	IE-MPA identifies rural transportation shortages as one of the region's largest barriers and recommends rural-specific solutions.	Goal 2 (ICA)
Travel training	No mention of helping people learn to use transit.	Not addressed	IE-MPA recommends travel training, mobility management, and increasing confidence using transportation systems.	Goal 2 (ICA)
Transportation education and outreach	ADA notices and accommodation procedures are provided.	pp. 7–18	IE-MPA recommends including public education campaigns about transportation options or mobility resources recommended by the IE-MPA.	Goal 2 (ICA)
Caregiver transportation needs	Caregivers are not discussed.	Not addressed	IE-MPA recognizes caregivers as transportation partners and recommends supports for caregiver transportation responsibilities.	Goal 3: Caregiving, Alzheimer's Disease & Dementias (ICA)
People with dementia or cognitive impairment	Cognitive disabilities are acknowledged generally under ADA.	General ADA references	IE-MPA recommends including dementia-friendly transportation practices, wayfinding, staff training, or simplified navigation strategies are included.	Goal 3 (ICA)
Health equity	Accessibility is the focus.	Not addressed	Transportation is connected to healthcare access, healthy aging, or health outcomes as emphasized in the IE-MPA. Include discussion beyond simple accessability and connect to these other elements	Goals 1, 2 & 4 (ICA)
Digital literacy	Website accessibility is emphasized.	pp. 18–20	We recommend addressing helping older adults learn to use transportation technology, apps, trip planning, or digital navigation tools.	Goal 2; Goal 5 (technology access) (ICA)
Transportation affordability	No discussion of fares or financial barriers.	Not addressed	IE-MPA recommends discounted fares, fare-free programs, and reducing transportation costs for older adults and people with disabilities.	Goal 2 (ICA)
Community engagement	Includes disability organizations and PASTACC.	pp. 23–27	IE-MPA calls for ongoing leadership roles for older adults, caregivers, and disability advocates in transportation decision-making beyond ADA consultation.	Goal 2 (ICA)
Performance measures	Includes ADA implementation schedule and barrier removal timelines.	pp. 27–40	The SBCTA ADA Plan should establish outcomes such as increased ridership by adults with disabilities (including older adults), reduced transportation barriers, customer satisfaction, or mobility improvements recommended by the IE-MPA implementation framework.	IE-MPA implementation framework (ICA)
Climate resilience and extreme heat	Emergency planning focuses on ADA evacuation and accessibility.	pp. 15–16	The SBCTA ADA Plan should address transportation resilience during extreme heat, wildfire smoke, or other climate impacts that disproportionately affect older adults.	Goal 5 (ICA)

Appendix G SBCTA Website Accessibility Evaluations

OPARC Evaluations

www.gosbcta.com

General Accessibility

- ☑ All pages can be navigated using keyboard only (Tab, Enter, Space, Arrow keys).
- ☑ No flashing content or animations that could trigger seizures (or includes a warning).
- ☑ Users can pause, stop, or hide auto-moving content (carousels, alerts).

Text and Readability

- ☑ Text size can be increased up to 200% without losing content or function.
- ☐ Adequate color contrast
- ☐ Plain-language writing; essential information is short and clear.
- ☐ Consistent headings and page structure.

Images and Media

- ☐ All meaningful images have alt-text that describes purpose, not just appearance.
- ☐ Decorative images are marked as decorative.
- ☐ Videos have captions
- ☐ Audio-only content has a transcript.

Navigation and Structure

- ☑ Navigation menus are consistent across the site.
- ☑ "Skip to main content" link exists and works.
- ☑ Page titles clearly describe the page's purpose.

Forms & Online Tools

- ☐ All form fields have labels and instructions.
- ☐ Forms can be submitted using keyboard only.

PDFs & Documents

- ☐ PDFs are readable by screen readers and allow text selection.
- ☐ Alternative formats are available (HTML, Word, accessible PDF).

General Accessibility its good, but i dont hear this website

Text and Readability Its ok

Images and Media good images. not much media

Navigation and Structure Its ok to navigate

Forms & Online Tools Yeah. good

PDFs & Documents Its ok

www.gosbcta.com

General Accessibility

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- ☐ Users can pause, stop, or hide auto-moving content (carousels, alerts).

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PDFs & Documents

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- ☐ Alternative formats are available (HTML, Word, accessible PDF).

General Accessibility

What I thought about it is good that the page can be navigated by using key board for the space enter and arrow keys

Text and Readability

For the text can be bad because people can't read cannot see for this I chose that the text size can be increased up to 200 when we are not losing vision

Images and Media

For image and media it's meaning full images and storytime for the video the caption and the audio can be good to be under standing

Navigation and Structure

Understand that navigation and structure show, the menu side link and searching the way

Forms & Online Tools

For the form and online tools it help the labels and instruction, to submities for the key boards

PDFs & Documents

The PDF and documents help type page and words to allow the text selection and other option

www.gosbcta.com

General Accessibility

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- ☐ No flashing content or animations that could trigger seizures (or includes a warning).
- ☐ Users can pause, stop, or hide auto-moving content (carousels, alerts).

Text and Readability

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- ☐ Adequate color contrast
- ☐ Plain-language writing; essential information is short and clear.
- ☐ Consistent headings and page structure.

Images and Media

- ☐ All meaningful images have alt-text that describes purpose, not just appearance.
- ☐ Decorative images are marked as decorative.
- ☐ Videos have captions
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Navigation and Structure

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- ☐ "Skip to main content" link exists and works.
- ☐ Page titles clearly describe the page's purpose.

Forms & Online Tools

- ☐ All form fields have labels and instructions.
- ☐ Forms can be submitted using keyboard only.

PDFs & Documents

- ☐ PDFs are readable by screen readers and allow text selection.
- ☐ Alternative formats are available (HTML, Word, accessible PDF).

General Accessibility Good

Text and Readability Good

Images and Media Good

Navigation and Structure Good

Forms & Online Tools Good

PDFs & Documents Good

SBCTA Website Accessibility Checklist

Guidelines: Perceivable, Operable, Understandable, Robust

www.gosbcta.com

General Accessibility

- ☑ All pages can be navigated using keyboard only (Tab, Enter, Space, Arrow keys).
- ☑ No flashing content or animations that could trigger seizures (or includes a warning).
- ☐ Users can pause, stop, or hide auto-moving content (carousels, alerts).

Text and Readability

- ☐ Text size can be increased up to 200% without losing content or function.
- ☑ Adequate color contrast
- ☑ Plain-language writing; essential information is short and clear.
- ☑ Consistent headings and page structure.

Images and Media

- ☐ All meaningful images have alt-text that describes purpose, not just appearance.
- ☐ Decorative images are marked as decorative.
- ☐ Videos have captions
- ☐ Audio-only content has a transcript.

Navigation and Structure

- ☑ Navigation menus are consistent across the site.
- ☐ "Skip to main content" link exists and works.
- ☑ Page titles clearly describe the page's purpose.

Forms & Online Tools

- ☐ All form fields have labels and instructions.
- ☐ Forms can be submitted using keyboard only.

PDFs & Documents

- ☐ PDFs are readable by screen readers and allow text selection.
- ☐ Alternative formats are available (HTML, Word, accessible PDF).

Evaluation Comments

www.gosbcta.com

General Accessibility

Although able to navigate using keyboard, it is not easy to then utilize site through keyboard only.

Text and Readability

Could not figure out how to increase size of text.

Images and Media

Only one video accessed had captions. Didn't see any images that had alternative text to describe.

Navigation and Structure

Did not see "skip to content"

Forms & Online Tools

Could not access any forms

PDFs & Documents

Did not see anywhere to use alternative formats

SBCTA Website Accessibility Checklist

Guidelines: Perceivable, Operable, Understandable, Robust

www.gosbcta.com

General Accessibility

- ☑ All pages can be navigated using keyboard only (Tab, Enter, Space, Arrow keys).
- ☑ No flashing content or animations that could trigger seizures (or includes a warning).
- ☑ Users can pause, stop, or hide auto-moving content (carousels, alerts).

Text and Readability

- ☑ Text size can be increased up to 200% without losing content or function.
- ☑ Adequate color contrast
- ☑ Plain-language writing; essential information is short and clear.
- ☑ Consistent headings and page structure.

Images and Media

- ☑ All meaningful images have alt-text that describes purpose, not just appearance.
- ☒ Decorative images are marked as decorative.
- ☑ Videos have captions
- ☑ Audio-only content has a transcript.

Navigation and Structure

- ☑ Navigation menus are consistent across the site.
- ☑ "Skip to main content" link exists and works.
- ☑ Page titles clearly describe the page's purpose.

Forms & Online Tools

- ☑ All form fields have labels and instructions.
- ☑ Forms can be submitted using keyboard only.

PDFs & Documents

- ☑ PDFs are readable by screen readers and allow text selection.
- ☑ Alternative formats are available (HTML, Word, accessible PDF).

Evaluation Comments

www.gosbcta.com

General Accessibility

Ensure all interactive elements are keyboard-accessible.

Text and Readability

Images and Media

Navigation and Structure

Page structure is mostly consistent, but some subpages differ slightly in layout. such as home page vs other landing pages tend to differ in layout.

Forms & Online Tools

PDFs & Documents

Anthesis Evaluations

SBCTA Website Accessibility Checklist

Guidelines: Perceivable, Operable, Understandable, Robust

www.gosbcta.com

General Accessibility

- ☑ All pages can be navigated using keyboard only (Tab, Enter, Space, Arrow keys).
- ☑ No flashing content or animations that could trigger seizures (or includes a warning).
- ☑ Users can pause, stop, or hide auto-moving content (carousels, alerts).

Text and Readability

- ☑ Text size can be increased up to 200% without losing content or function.
- ☐ Adequate color contrast
- ☐ Plain-language writing; essential information is short and clear.
- ☐ Consistent headings and page structure.

Images and Media

- ☐ All meaningful images have alt-text that describes purpose, not just appearance.
- ☐ Decorative images are marked as decorative.
- ☐ Videos have captions
- ☐ Audio-only content has a transcript.

Navigation and Structure

- ☐ Navigation menus are consistent across the site.
- ☐ "Skip to main content" link exists and works.
- ☐ Page titles clearly describe the page's purpose.

Forms & Online Tools

- ☑ All form fields have labels and instructions.
- ☑ Forms can be submitted using keyboard only.

PDFs & Documents

- ☑ PDFs are readable by screen readers and allow text selection.
- ☐ Alternative formats are available (HTML, Word, accessible PDF).

Evaluation Comments

www.gosbcta.com

General Accessibility

Site can be functionally navigated with keyboard but it is a sub-optimal experience. Too many selectable options to tab through.

Text and Readability

All text was clear, legible, and able to be magnified at least 200%

Images and Media

No images featured alt text, only select videos had captions.

Navigation and Structure

Navigation menu descriptions are unclear in their purpose and there is too many subpages under each heading.

Forms & Online Tools

Mailing list forms and donation forms are clear minimalist and easy to navigate.

PDFs & Documents

PDFs are provided in embedded PDF viewer

Blindness Support Evaluations

SBCTA Website Accessibility Checklist

Guidelines: Perceivable, Operable, Understandable, Robust

www.gosbcta.com

General Accessibility

☑ All pages can be navigated using keyboard only (Tab, Enter, Space, Arrow keys).

☐ No flashing content or animations that could trigger seizures (or includes a warning).

N/A ☐ Users can pause, stop, or hide auto-moving content (carousels, alerts).

Text and Readability

See Below ☐ Text size can be increased up to 200% without losing content or function.

☑ Adequate color contrast

☑ Plain-language writing; essential information is short and clear.

☑ Consistent headings and page structure.

Images and Media

NO ☐ All meaningful images have alt-text that describes purpose, not just appearance.

N/A ☐ Decorative images are marked as decorative.

☑ Videos have captions

N/A ☐ Audio-only content has a transcript.

Navigation and Structure

NO ☐ Navigation menus are consistent across the site.

☑ "Skip to main content" link exists and works.

NO ☐ Page titles clearly describe the page's purpose.

Forms & Online Tools

☑ All form fields have labels and instructions.

☑ Forms can be submitted using keyboard only.

PDFs & Documents

☑ PDFs are readable by screen readers and allow text selection.

☑ Alternative formats are available (HTML, Word, accessible PDF).

Evaluation Comments

www.gosbcta.com

General Accessibility

The SBCTA homepage is fully accessible and mostly user friendly with the JAWS screen reader software. Web (HTML) elements are properly labeled throughout the home page and other pages, making it easy and straight forward to navigateraccess with a screen reader. One minor exception is that t he X (twitter) and YouTube links are not tagged as graphics/images (like Facebook, LinkedIn, and Instagram are) and these two links are not properly labeled with alt text to clearly identify which social media platform will be launched/opened when using a screen reader to activate the links for each.

Text and Readability

Users are able to increase text size through browser zoom or text-size adjustments, and much of the page responds well to enlargement. Text remains clear, well-spaced, and easy to read up to 200%.
However, the main page navigation headings and tabs collapse into a compact menu before reaching 200% zoom. On a 16-inch screen, this occurs after moving from 150% to 175%. On larger screens, including 24-inch and 32-inch monitors, the collapse begins after moving from 175% to 200%. At 200%, users must locate and open the collapsed menu to reach essential navigation elements. This may reduce discoverability and presents a concern for users who rely on enlarged text for accessibility.

Images and Media

On the Measure I Funding webpage the image of the brochure is not tagged as a graphic but only as a link, which can make it a little confusing for a screen reader user especially since the text below the image says to click on the image above to view the brochure. On the Plan Build Move webpage t wo of the twenty graphics (number 11 and 13) are not properly labelled with any alt text to describe what is in the image for a screen reader user. T hough most of the graphics are labeled with alt text, the text describes the appearance of the image not the purpose as mentioned in the checklist item above.

Navigation and Structure

The home page and all the subsequent pages one can visit are consistent with navigation regions and consistent heading levels that make it easy and straight forward to move through for a screen reader user. There is no skip to main content link on the home page, but this is not always helpful or necessary for a screen reader user.

Forms & Online Tools

All of the various form field elements were properly tagged and thus accessible for a screen reader. The only minor glitch that was encountered was when conducting a search from the home page and navigating through the results on the webpage that loaded, the first page did not contain any results, but the second and subsequent pages did contain results from the search.

PDFs & Documents

The PDF file that was downloaded from a specific project was accessible and properly tagged for a screen reader user to access and navigate the contents.

Appendix H December 8, 2025, PASTACC Attendees

Meeting Minutes, December 8, 2025, at the Omnitrans Board Room
Attendees:

Voting Member Participants:
Anthesis: Patty Lopez
Department of Aging and Adult Services (DAAS): Danielle De Los Santos
Foothill AIDS Project: D'Angelo Stowers
Loma Linda University Health: Whitney Henderson
Mountain Transit: Sandy Benson, Noemi Anaya
Reach Out Morongo Basin: Robin Schlosser
Omnitrans: Arianna Maldonado, Jeremiah Bryant, Ruby Sulca
Victor Valley Transit Authority (VVTA): Marie Downing, Megan Christian, Michelle Morris

Other Participants:
Blindness Support Services: Zico Ortiz
City of Chino: Tammy Danson; Bobby
Caltrans District 8: Darlene Reyes
Connect Senior Center/Upland Manor: Ryan Showalter
Inland Caregiver Resource Center: Jaritza Mendoza
OPARC: Shawn Werve, Sonia Borja
Rolling Start: Joann Wilkes, Jennifer Raby
San Bernardino County Public Works: David Belicki
VIP, Inc: Leveanna Thomas

Staff Support
AMMA Transit Planning: Dennis Brooks, Andrea Breault
SBCTA – Mairany Anaya, Nicole Soto, Jennifer Joo, Victor Lopez