



City of College Station

ADA Self-Evaluation and Transition Plan

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CITY OF COLLEGE STATION

ADA SELF-EVALUATION AND TRANSITION PLAN



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In association with:



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1.0 PURPOSE

The purpose of this Plan is to outline how the City of College Station will work to improve accessibility and equal access by fulfilling the requirements of the Americans with Disabilities Act (ADA). The City makes a commitment to this effort by implementing this living, ongoing ADA Self-Evaluation and Transition Plan. This includes all associated efforts including such actions as evaluating, planning, responding, and improving with regard to public services, programs, or activities, and related physical barriers.

Accommodating people with disabilities is essential for effective governance and excellent customer service and to sustain the quality of life for which the City of College Station is known.

This document includes an overview of ADA, provides recommendations for the City of College Station based on a self-evaluation, and presents a Transition Plan for the removal of barriers in and along facilities (buildings and right-of-way) to improve accessibility in services, programs, and activities offered to the public. The Transition Plan is the first phase for evaluating physical barriers. Additional phases will be needed to evaluate the remaining facilities that exist in the City.

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2.0 INTRODUCTION

2.1 LEGISLATIVE MANDATE

The Americans with Disabilities Act (ADA) is a civil rights law that mandates equal opportunity for individuals with disabilities. The ADA prohibits discrimination in access to jobs, government services, public transportation, public accommodations, and telecommunications. There are five titles of the ADA including:

- Title I: Employment
- Title II: State and Local Government
- Title III: Public Accommodations and Commercial Facilities
- Title IV: Telecommunications Relay Services
- Title V: Miscellaneous Provisions

The City of College Station is obligated to observe all requirements of Title I in its employment practices; Title II in its policies practices, services, programs, and activities; and any parts of Titles IV and V that may apply to the City. Title III only covers businesses and nonprofit service providers and is not applicable to the City of College Station.

Title IV of the ADA requires that telephone companies provide telecommunication relay services that allow individuals with hearing or speech impairments to communicate using a teletypewriter (TTY) or other non-voice device. It also requires that all television public service announcements produced or funded in whole or in part by the Federal government include closed captioning. Title IV would not apply to the City of College Station unless they are receiving funds from the Federal government for television service announcements.

Title V is a miscellaneous section. It includes provisions that do not allow the ADA to invalidate or override other laws (federal, state, and local) to provide equal or greater protections or remedies for people with disabilities. It includes exclusions of conditions from the definition of accessibility. Title V also includes protection of individuals from retaliation, intimidation, coercion, threats, or interference with people who seek to exercise their rights, or who encourage or aid others to do so, is prohibited.

This document addresses the requirements of Title II of the ADA.

2.2 DEFINITIONS

The following is a summary of many definitions found in the ADA. Please refer to the Americans with Disabilities Act for the full text of definitions and explanations.

Disability

The term disability means, with respect to an individual:

- A physical or mental impairment that substantially limits one or more of the major life activities of such individual;
- A record of such impairment; or
- Being regarded as having such impairment.

Qualified Individual with a Disability

A qualified individual with a disability means an individual with a disability who, with or without reasonable modification to rules, policies, or practices; the removal of architectural, communication, or transportation barriers; or the provision of auxiliary aids and services, meets the essential eligibility requirements for the receipt of services or the participation in programs or activities provided by the City.

Discrimination on the Basis of Disability

Discrimination on the basis of disability means to:

- Limit, segregate, or classify a citizen in a way that may adversely affect opportunities or status because of the person's disability;
- Limit, segregate, or classify a participant in a program or activity offered to the public in a way that may adversely affect opportunities or status because of the participant's disability;
- Participate in a contract that could subject a qualified citizen with a disability to discrimination;
- Use any standards, criteria, or methods of administration that have the effect of discriminating on the basis of disability;
- Deny equal benefits because of a disability;
- Fail to make reasonable accommodations to known physical or mental limitations of an otherwise qualified individual unless it can be shown that the accommodation would impose an undue burden on the City's operations;
- Use selection criteria that exclude otherwise qualified people with disabilities from participating in the programs or activities offered to the public; and
- Fail to use tests, including eligibility tests, in a manner that ensures that the test results accurately reflect the qualified applicant's skills or aptitude to participate in a program or activity.

Complaint

A complaint also referred to as a grievance is a claimed violation of the ADA.

Substantial Limitation of Major Life Activities

An individual is disabled if she or he has a physical or mental impairment that (a) renders her or him unable to perform a major life activity, or (b) substantially limits the condition, manner, or duration under which she or he can perform a particular major life activity in comparison to other people.

Major life activities are functions such as walking, seeing, hearing, speaking, breathing, learning, performing manual tasks, or caring for oneself.

In determining whether physical or mental impairment substantially limits the condition, manner, or duration under which an individual can perform a particular major life activity in comparison to other people, the following factors shall be considered:

- The nature and severity of the impairment;
- The duration or expected duration of the impairment; and
- The permanent or long term impact (or expected impact) of or resulting from the impairment.

Having a Record of Impairment

An individual is disabled if he or she has a history of having an impairment that substantially limits the performance of a major life activity; or has been diagnosed, correctly or incorrectly, as having such impairment.

Regarded as Having a Disability

An individual is disabled if she or he is treated or perceived as having an impairment that substantially limits major life activities, although no such impairment exists.

Reasonable Program Modifications

If the individuals' disabilities prevent them from performing the essential functions of the program or activity, it is necessary to determine whether reasonable program modifications would enable these individuals to perform the essential functions of the program or activity.

Reasonable program modification is any change in program or activity or in the way things are customarily done that enables an individual with a disability to enjoy equal program opportunities. Accommodation means modifications or adjustments:

To a registration or application process to enable an individual with a disability to be considered for the program or activity;

To the program or activity environment in which the duties of a position are performed so that a person with a disability can perform the essential functions of the program or activity; and

That enables individuals with disabilities to enjoy equally the benefits of the program or activity as other similarly situated individuals without disabilities enjoy.

Modification includes making existing facilities and equipment used by individuals readily accessible and usable by individuals with disabilities.

Modification applies to known disabilities only. Modification is not required if it changes the essential nature of a program or activity of the person with a disability, it creates a hazardous situation, adjustments or modifications requested are primarily for the personal benefit of the individual with a disability, or it poses an undue burden on the City.

Auxiliary Aids and Services

The term auxiliary aids and services include:

- Qualified interpreters or other effective methods of making orally delivered materials available to individuals with hearing impairments;
- Qualified readers, taped texts, or other effective methods of making visually delivered materials available to individuals with visual impairments;
- Acquisition or modification of equipment or devices; and
- Other similar services and actions.

2.3 ADA SELF-EVALUATION AND TRANSITION PLAN DEVELOPMENT REQUIREMENTS

Title II requires the operation of each service, program or activity so that, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities.¹ It is firmly stated that no qualified individual with a disability may be excluded from participating in, or denied the benefits of, the services, programs, or activities provided by a public entity because of a disability².

Included in Title II are administrative requirements for all government entities employing more than 50 people. These administrative requirements are:

1. to notify applicants, participants, beneficiaries, and other interested people of their rights and the public entity's obligations under Title II³
2. to designate a responsible employee (ADA Coordinator) to coordinate its efforts to comply with and carry out the public entity's ADA responsibilities⁴
3. to establish a grievance procedure for resolving complaints related to Title II⁵
4. to conduct a self-evaluation⁶
 - A self-evaluation is an assessment of the public entity's services, programs, and activities and the policies and practices that govern the administration of them. This can include laws, ordinances, regulations, and manuals. The goal is to determine if the policies and practices adversely affect full participation of individuals with disabilities.
5. to develop a transition plan⁷
 - In the event that structural changes to facilities will be undertaken to achieve program accessibility, a Transition Plan setting forth the steps necessary to complete such changes must be developed.

The plan shall, at a minimum --

- a) Identify physical obstacles in the public entity's facilities that limit the accessibility of its programs or activities to individuals with disabilities
- b) Describe in detail the methods that will be used to make the facilities accessible
- c) 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

2.4 PROGRAMMATIC / PHYSICAL ACCESSIBILITY

Program accessibility means that, when viewed in its entirety, each program is readily accessible to and usable by individuals with disabilities. Program accessibility is necessary not only for individuals with mobility needs, but also to individuals with sensory and cognitive disabilities.

¹ 28 C.F.R. §§ 35.149-150

² 42 U.S.C. § 12132; 42 U.S.C § 12102(2)(B) & (C)

³ 28 C.F.R. § 35.106

⁴ 28 C.F.R. § 35.107(a)

⁵ 28 C.F.R. § 35.107(b)

⁶ 28 C.F.R. § 35.105

⁷ 28 C.F.R. § 35.150

Accessibility applies to all aspects of a program or service, including but not limited to physical access, advertisement, orientation, eligibility, participation, testing or evaluation, provision of auxiliary aids, transportation, policies, and communication.

The following are examples of elements that should be evaluated for barriers to accessibility:

2.4.1 EXAMPLE BARRIERS

- Building signage
- Customer communication and interaction
- Sidewalks or curb ramps
- Emergency notifications, alarms, and visible signals
- Participation opportunities for City-sponsored events
- Parking
- Path of travel to, throughout, and between buildings and amenities
- Doors
- Service counters
- Restrooms
- Drinking fountains
- Path of travel along sidewalk corridors within the public right-of-way
- Access to pedestrian equipment at signalized intersections

2.4.2 EXCEPTIONS AND EXEMPTIONS

The City must reasonably modify its policies, practices, services, programs, or activities to avoid discrimination. Delivery of services, programs, or activities can be provided in alternate ways, including, redesign of equipment, reassignment of services, assignment of aides, or other methods of compliance and/or by making physical changes to buildings and right-of-way. When required to modify an existing program, the City should endeavor to give priority to the alternative solution (i.e., physical changes or program relocation, etc.) that results in the most integrated setting appropriate to encourage interaction among all users, including individuals with disabilities. In compliance with the requirements of the ADA, the City provides equality of opportunity but does not guarantee equality of results.

If the City can demonstrate, however, that making the modifications would fundamentally alter the nature of what is affected, it is not required to make the modification. The City is also not required to take any action that would create for the public entity any undue financial and administrative burden, create a hazardous condition for other people, or threaten or destroy the historic significance of a historic property. The City is not necessarily required to make each of its existing facilities accessible to and usable by individuals with disabilities.

In the event the City determines a proposed action would fundamentally alter a service, program or activity or generate undue financial or administrative burden, the City has a responsibility to communicate and document the decision and the methodology used to reach it. If an action would result in such an alteration or such burdens, the City shall take any other actions that would not result in such an alteration or such burdens but would nevertheless ensure that individuals with disabilities receive the benefits or services provided by the City.

In determining whether an accommodation would impose an undue hardship on a covered entity, factors to be considered include: (i) the nature and cost of the accommodation needed under this chapter; (ii) the overall financial resources of the facility or facilities involved in the provision of the reasonable

accommodation; the number of persons employed at such facility; the effect on expenses and resources, or the impact otherwise of such accommodation upon the operation of the facility; (iii) the overall financial resources of the covered entity; the overall size of the business of a covered entity with respect to the number of its employees; the number, type, and location of its facilities; and (iv) the type of operation or operations of the covered entity, including the composition, structure, and functions of the workforce of such entity; the geographic separateness, administrative, or fiscal relationship of the facility or facilities in question to the covered entity.

There are some situations where it is not possible to integrate people with disabilities without fundamentally altering the nature of a program, service, or activity. For example, moving a beach volleyball program into a gymnasium, so a player who uses a wheelchair can participate on a flat surface without sand, would “fundamentally alter” the nature of the game. The ADA does not require changes of this nature.

2.4.3 NEW CONSTRUCTION AND ALTERATIONS

Physical changes to buildings must be made in accordance with the Department of Justice's Title II regulation and the 1991 ADA Standards for Accessible Design or the Uniform Federal Accessibility Standards and the 2010 ADA Standards for Accessible Design.

If the start date for construction is on or after March 15, 2012, all newly constructed or altered State and local government facilities must comply with the 2010 ADA Standards. Before that date, the 1991 Standards (without the elevator exemption), the Uniform Federal Accessibility Guidelines, or the 2010 ADA Standards may be used for such projects when the start of construction commences on or after September 15, 2010.

An alteration that affects or could affect the usability of or access to an area of a facility that contains a primary function shall be made so as to ensure that, to the maximum extent feasible, the path of travel to the altered area and the restrooms, telephones, and drinking fountains serving the altered area are readily accessible to and usable by individuals with disabilities, including individuals who use wheelchairs, unless the cost and scope of such alterations is disproportionate to the cost of the overall alteration.

Alterations made to provide an accessible path of travel to the altered area will be deemed disproportionate to the overall alteration when the cost exceeds 20% of the cost of the alteration to the primary function area.

When the cost of alterations necessary to make the path of travel to the altered area fully accessible is disproportionate to the cost of the overall alteration, the path of travel shall be made accessible to the extent that it can be made accessible without incurring disproportionate costs. In choosing which accessible elements to provide, priority should be given to those elements that will provide the greatest access, in the following order: (1) An accessible entrance; (2) An accessible route to the altered area; (3) At least one accessible restroom for each sex or a single unisex restroom; (4) Accessible telephones; (5) Accessible drinking fountains; and (6) When possible, additional accessible elements such as parking, storage, and alarms.

The City of College Station has a policy to use the most recent guidelines and standards. The most recent standard is the 2010 ADA Standards for Accessible Design, which sets the minimum requirements – both scoping and technical – for newly designed and constructed or altered State and local government facilities, public accommodations, and commercial facilities to be readily accessible to and usable by individuals with disabilities. It is effectuated from 28 CFR 35.151 and the 2004 Americans with Disabilities Act Accessibility Guidelines (ADAAG).

Maintenance versus Alterations

The United States Department of Justice (DOJ) has issued a briefing memorandum on clarification of maintenance versus projects. Information contained in the briefing memorandum is below. We recommend this clarification with regard to curb ramp installation projects.

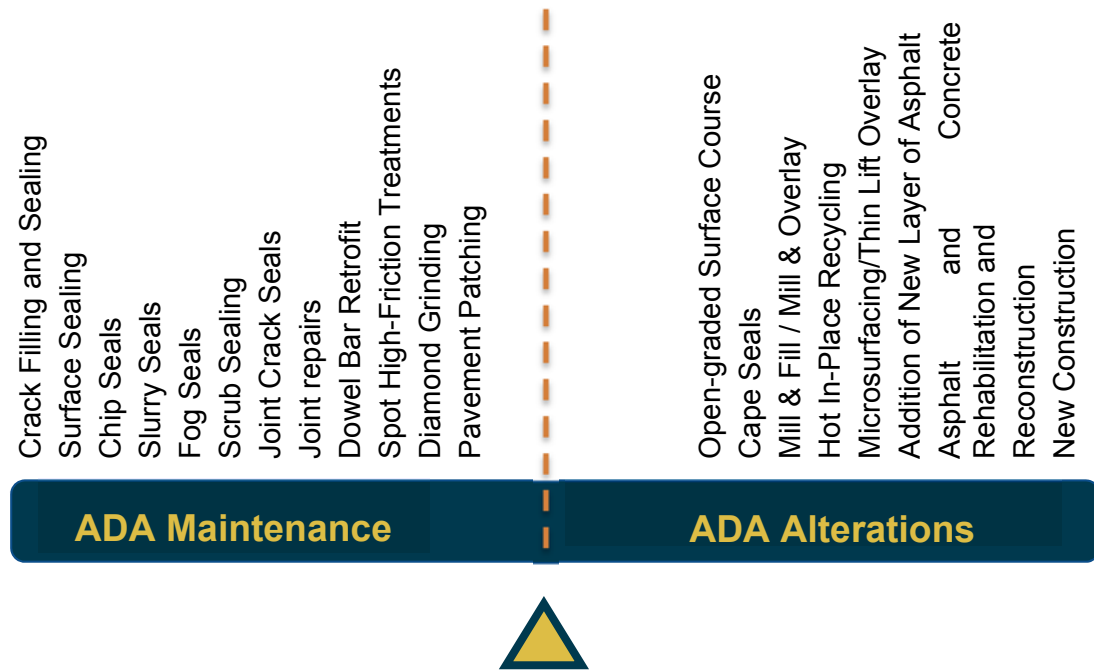
The Americans with Disabilities Act of 1990 (ADA) is a civil rights statute prohibiting discrimination against persons with disabilities in all aspects of life, including transportation, based on regulations promulgated by the United States Department of Justice (DOJ). DOJ's regulations require accessible planning, design, and construction to integrate people with disabilities into mainstream society. Further, these laws require that public entities responsible for operating and maintaining the public right-of-way do not discriminate in their programs and activities against persons with disabilities. FHWA's ADA program implements the DOJ regulations through delegated authority to ensure that pedestrians with disabilities have the opportunity to use the transportation system's pedestrian facilities in an accessible and safe manner.

FHWA and DOJ met in March 2012 and March 2013 to clarify guidance on the ADA's requirements for constructing curb ramps on resurfacing projects. Projects deemed to be alterations must include curb ramps within the scope of the project.

*This clarification provides a single Federal policy that identifies specific asphalt and concrete-pavement repair treatments that are considered to be alterations – requiring installation of curb ramps within the scope of the project – and those that are considered to be maintenance, which do not require curb ramps at the time of the improvement. **Figure 5** provides a summary of the types of projects that fall within maintenance versus alterations.*

This approach clearly identifies the types of structural treatments that both DOJ and FHWA agree require curb ramps (when there is a pedestrian walkway with a prepared surface for pedestrian use and a curb, elevation, or other barrier between the street and the walkway) and furthers the goal of the ADA to provide increased accessibility to the public right-of-way for persons with disabilities. This single Federal policy will provide for increased consistency and improved enforcement.

Figure 5. Maintenance versus Alteration Projects



Source: DOJ Briefing Memorandum on Maintenance versus Alteration Projects

FHWA Guidance on Closing Pedestrian Crossings

The FHWA has provided guidance on closing pedestrian crossings. If an engineering study (performed by the City and not included in the scope of this Transition Plan) determines the crossing is not safe for any user, the crossing should be closed by doing the following:

- A physical barrier is required to close a crossing at an intersection. FHWA has determined that a strip of grass between the sidewalk and the curb IS acceptable as a physical barrier.
- A sign should be used to communicate the closure.

The City of College Station should develop policies and procedures outlining the steps required to close an existing pedestrian crossing. These policies and procedures can either be included in the Transition Plan or as a standalone document.

3.0 PUBLIC OUTREACH

The City of College Station provided opportunities to receive input from the public concerning its Self-Evaluation and Transition Plan. The following segments detail these opportunities.

3.1 PUBLIC FOCUS GROUP MEETING

The City invited local organizations representing people with disabilities to attend a focus group meeting on January 21, 2015, to comment on the City's accessibility efforts, ask questions, and share concerns related to ADA needs in the community. Focus group meeting notes are provided in **Appendix A**.

Based on comments, the City will be following up on the following items:

- Evaluating the need for more Accessible Pedestrian Signals (APS), especially around Texas A&M University.
- Prioritizing the following locations for new sidewalks requested:
 - Tarrow Street/ E. 29th Street
 - Gaps along Southwest Parkway near Wellborn Road
 - Gaps on Munson Avenue

3.2 PUBLIC WORKSHOP

The City hosted a public workshop on May 5, 2015, to introduce the Plan, solicit feedback on the planning process and any concerns related to accessibility in general. The Public Meeting notes are provided in **Appendix A**.

Based upon comments, the City will be following up on the following items:

- Evaluating the following sidewalk locations identified for ADA compliance in the next phase of the plan:
 - Harvey Mitchell Parkway near Welsh Avenue
 - Anderson Street from George Bush Drive to Southwest Parkway
 - Wellborn Road
- Educating staff on interpretive services the City should provide for programs and services offered such as Parks and Recreation programs and police and fire interactions in the field.
- Evaluating the use of video phones in public locations such as the library.

The City hosted a second public workshop on September 28, 2015, to solicit feedback on the plan that was made available online, as well as any concerns related to accessibility in general. The Public Meeting notes are provided in **Appendix A**.

Based on comments, the City will be following up on the following items:

- Evaluating the sidewalks on Holik Street in front of A&M Consolidated Middle School for ADA compliance in the next phase of the plan.
- Evaluating the City's traffic control plan guidelines and practices related to temporary pedestrian accommodations during construction.

3.3 ADA COORDINATOR

A public entity is required to designate at least one responsible employee to coordinate its efforts to comply with ADA, implement this plan and handle any grievances or concerns.

The City of College Station has set up a system which includes a citywide ADA Coordinator and representatives from each department to better cover the needs of individuals with disabilities. Department representatives will work with the ADA Coordinator to ensure their department's compliance with Title II.

As referenced in Section 2.4.3, the City is not required by the ADA to modify a policy, program, service or activity if the change would result in a fundamental alteration in the nature of a program or activity, would create a hazardous condition for other people, or would represent an undue financial and administrative burden. The ADA Coordinator will document the City's response to grievances and requests for accommodation, including the resources considered and the methodology used to determine how the accommodation or modification would impact programs or resources.

3.4 GRIEVANCE PROCEDURE AND GRIEVANCE FORM PROCESS

Public entities with 50 or more employees are required to adopt and publish grievance procedures for Title II complaints. The Department of Justice does not require a grievance form, but a form can be an effective tool for collecting information to address a complaint. Title II does not specify what must be included in a grievance procedure, but the Department of Justice has developed a model grievance procedure that can be used as a starting point.

The City established a formal grievance procedure as part of this project, based on the Department of Justice's recommended language. Subsequently, the City created a standard grievance form to capture relevant information from the individual filing the grievance. This document will provide the City with a method of tracking and documenting all grievances filed with the City and their respective outcomes. The grievance procedure and a sample grievance form are included in **Appendix B**.

4.0 SELF-EVALUATION AND SUMMARY OF FINDINGS

4.1 DEPARTMENTAL SURVEYS

The self-evaluation of policies and practices as well as services, programs, and activities offered involved the participation of City departments through an electronic survey and follow-up questions by email. The following City departments completed the survey:

City Departments	
City Manager's Office/Economic Development*	Information Technology
City Secretary	Legal Department
College Station Utilities	Parks and Recreation
Community Services	Planning & Development Services
Emergency Management/Fire Department*	Police Department
Fiscal Services/Municipal Court*	Public Communications
Human Resources	Public Works Department

* Both departments completed a combined survey.

Departmental surveys were designed to collect information on how a person with a disability would participate in each department's services, programs, or activities. The surveys gathered the following information (as relevant to each department):

- Program or service description for each program/service offered by each department
- Characterization of program or service participants, along with a description of any participation requirements, and any adaptations made to assist persons with disabilities
- List of facilities where program or service takes place
- Training provided or available to employees who manage the programs
- Transportation procedures and methods for persons with disabilities
- Communication procedures for presentations, telephone conversations, program notifications, print materials, including modifications or equipment to accommodate people with disabilities
- 9-1-1 services for people with sensory impairments
- Emergency evacuation procedures for people with disabilities
- Information regarding automated electronic equipment used in a program or service accessible to all participants.
- Methods used to ensure that all public meeting policies and procedures are designed to accommodate persons with disabilities.

Self-Evaluation Findings:

Upon review of the responses, most departments were aware of some forms of communication modification, such as paper and pencil or a reader, but are unaware of all of the additional options that can be offered or where to get them if needed. It was clear that training for staff in contact with the public is needed.

Recommended Actions:

A formal process for requesting modifications should be developed as well as a process for accommodating these modifications.

Staff training should be provided to City Staff; to address some of the issues identified in the departmental surveys and interviews. Additional training is also recommended for any new employees in customer service, emergency service personnel and maintenance. This additional training should be on an annual basis or as needed as determined by the City.

The following training sessions were provided by the consultant:

- March 30, 2015 – Disability Awareness for Staff in Contact with the Public (Class Option #1)
- March 20, 2015 – Orientation Training for ADA Liaison Committee
- April 1, 2015 – Joint Public Right-of-Way Training with the City of Bryan
- May 5, 2015 – Disability Awareness for Staff in Contact with the Public (Class Option #2)

Descriptions of each training provided are provided below:

Disability Awareness for Staff in Contact with the Public (2 hours)

The training provided an overview of the access criteria and requirements mandated for State and local government staff interacting with the public. Best practices for sensitive and respectful interactions were explained. Communication topics included correct language and etiquette, appropriate use of terminology, and dealing with service animals in public places. The training concluded with a brief overview of maintaining accessibility for people with disabilities.

Orientation for ADA Liaison Committee (2 hours)

This training provided instruction on how to review and evaluate City department's existing policies and procedures for the Self-Evaluation process required under Title II of the ADA. This training described how to use the findings from the departmental survey responses and staff interviews to develop a work plan for improving access for persons with disabilities. The training was specific to policies and practices to ensure non-discrimination from department to department.

Public Right-of-Way (4 hours)

This training explained the PROWAG requirements as well as the "spirit" of the ADA law. Topics covered included the difference between maintenance versus alterations, how to achieve compliance with difficult site constraints, how to make good decisions in the field, and how to know when additional help is needed. This class was very technical in the design and installation of curb ramps and sidewalks in the public rights-of-way.

4.2 BOARDS, COMMISSIONS, AND COMMITTEES

City Boards, Commissions, and Committees were reviewed for barriers to participation regarding the Citizen Committee Application.

The following Boards, Commissions, and Committees were reviewed:

City Boards, Commissions and Committees	
2015 CIP Bond Citizen Advisory Board Committee	Joint Relief Funding Review Committee
B/CS Library Committee	Landmark Commission
Bicycle, Pedestrian & Greenways Advisory Board	Parks & Recreation Board
Construction Board of Adjustments	Planning & Zoning Commission
Design Review Board	Zoning Board of Adjustments
Historic Preservation Committee	

Self-Evaluation Findings:

All appointed boards, commissions, and committees have a one-page membership application form that requests basic personal information, such as name and address. Review of the application process found no barriers of concern.

Recommended Actions

No changes are needed.

4.3 PUBLIC MEETINGS

Many City departments conduct public meetings such as those related to projects or plans, City Council meetings, and regular meetings of the Boards, Commissions, and Committees.

The procedures for conducting these meetings were reviewed to determine how a person with a disability is able to participate, ensure meetings are in accessible locations, and ensure people with disabilities have an equal opportunity to participate in civic life. To obtain this information, the Consultant distributed electronic surveys to appropriate staff and included the following questions:

- How are meeting notices distributed?
- Do meeting notices include information on how to request accommodations?
- Where are the meetings held?
- To your knowledge, is the facility accessible by people with disabilities?

Self-Evaluation Findings:

The boards, commissions and committees surveyed indicated that the public meetings are held in locations that are reasonably accessible to persons with mobility disabilities. However, the facilities at which most of the public meetings are held (College Station City Hall, Carnegie History Center, Larry Ringer Library, Wolf Pen Creek) were not evaluated for compliance in this phase of the project. The notices and agendas did not include or included inconsistent language indicating the availability of accessibility modifications. The information currently appears as follows:

“This building is wheelchair accessible. Handicap parking spaces are available. Any request for sign interpretive service must be made 48 hours before the meeting. To make arrangements call (979) 764-3541 or TDD 1-800-735-2989.”

Recommended Actions:

- Evaluate for compliance, all buildings and facilities where public meetings are held (College Station City Hall, Larry Ringer Library, Carnegie History Center, Wolf Pen Creek)
- Publicize the availability of auxiliary aids or services in all public notices and agendas for public meetings. Example:

“Auxiliary aids or services for individuals with communication disabilities can be provided upon request. Please make your request at least two business days before the meeting by contacting adaassistance@cstx.gov or (979) 764-3541.”

- Schedule public meetings in accessible locations whenever possible. At minimum, the following should be accessible when choosing a location to hold a meeting: parking, a route connected to the entrance of the building, hallways and corridors to the meeting room, and restrooms.
- Prepare a list of accessible meeting spaces to facilitate the scheduling of meetings.
 - When a fully accessible site is not available, make reasonable modifications so that an individual with a disability can participate (e.g. make structural changes to the site to make accessible or relocate meeting to another location that is accessible). Priority should be given to the choices that offer the most integrated setting possible.
 - Develop a checklist for creating accessible meetings and selecting accessible meeting spaces, and make the list available to all City departments and programs.
- Train and provide information to City staff on the types of auxiliary aids or services persons with disabilities may request.
 - Ensure staff handle requests consistently.
 - Ensure staff have access to a directory of available resources including a list of interpreters for providing effective communication.
 - For more in depth guidance on how to communicate effectively with people who have vision, hearing or speech disabilities, refer to **Appendix C**.
- During meetings, provide flexibility in the time limit on speaking for individuals with communication difficulties.

4.4 PRINTED INFORMATION

When reasonable requests are made, City departments must provide information in alternative formats, such as Braille, large-print format, audiotape, or in an electronic format.

Self-Evaluation Findings:

Most City departments and offices produce and distribute printed information including forms, permits and waivers.

While some City departments distribute information on how to obtain print information in alternate formats, other departments do not. Many departments routinely produce printed information in alternate formats upon request.

Most forms, permits, and waivers are only available in written form. There is inconsistency across the organization as to the availability of alternative formats of documents.

Recommended Actions:

- Include the following notice on all materials printed by the City that are made available to the public:

"This publication can be made available in alternative formats such as Braille or large print upon request, by contacting adaassistance@cstx.gov or (979) 764-3509. Please allow at least two business days for your request to be processed."

If required, ensure the uniformity of charges for a publication, for all formats of that publication. If publications are free, then a surcharge may not be imposed for alternative formats.

- Train City staff on how to make print information available in alternative formats to persons with disabilities when requested.
 - Ensure employees handle requests consistently.
 - Ensure employees have access to a directory of available resources for providing print materials in alternate formats.

4.5 PROGRAMS

Several unique community wide programs were reviewed as part of the Self-Evaluation to determine how a person with a disability would participate and alternative measures the City could take if any area of the program cannot be made accessible.

- Adopt-A-Greenway Program
- Adopt-A-Street Program
- Citizens Fire Academy
- Citizens Police Academy
- Citizens University
- Fire Public Education
- Housing Assistance Programs

- Home Buyer Education Programs
 - Down Payment Assistance Program
 - Housing Reconstruction Program
 - Housing Rehabilitation and Minor Repair Program
 - Leveraged Housing Development Program
 - PY 2014 (FY 2015) Fair Housing Action Plan
 - Rental Rehabilitation Loan Program
 - Tenant Based Rental Assistance Program
- Parks and Recreation Spring Guide (January – April 2015)
- Utility Education Programs

Self-Evaluation Findings and Recommended Actions

None of the programs reviewed had specific physical eligibility requirements, so these programs were determined to be accessible with a few exceptions. A lack of contact information for auxiliary aids and accommodations, which is required to be provided, was the most common issue identified in the programs. Specific issues for each program are provided in **Table 1**.

Table 1. Summary of Program Review

Name of Program	Self-Evaluation Findings	Recommended Actions
Adopt-A-Greenway	Contact information for auxiliary aides or accommodations not provided	Provide contact information for auxiliary aides or accommodation
Adopt-A-Street	Contact information for auxiliary aides or accommodations not provided	Provide contact information for auxiliary aides or accommodation
Citizens Fire Academy	Contact information for auxiliary aides or accommodations not provided	Provide contact information for auxiliary aides or accommodation
Citizens Police Academy	Contact information for auxiliary aides or accommodations not provided	Provide contact information for auxiliary aides or accommodation
Citizens University	Contact information for auxiliary aides or accommodations not provided	Provide contact information for auxiliary aides or accommodation
Code Enforcement	The Code of Ordinances does not make specific reference to the ADA and the Code Enforcement reporting system does not reference anything related to accessibility. Any accessibility-related issues should go through the grievance process and should be submitted on the grievance form. Citizens could use the online code violation reporting system to report accessibility issues but it would get lumped into the "Other" category.	Provide a direct link to the City's ADA Grievance Procedure and Grievance Form on the Code Enforcement webpage

Table 1. Summary of Program Review (cont.)

Name of Program	Self-Evaluation Findings	Recommended Actions
Fire Public Education	Contact information for auxiliary aides or accommodations not provided	Provide contact information for auxiliary aides or accommodation
Housing Assistance Programs	None	None
Home Buyer Education Programs	None	None
Parks and Recreation Activity Guide	"Notice Under the Americans with Disabilities Act" not provided No contact information for auxiliary aides or accommodations	Provide ADA notice within the activity guide Provide contact information for auxiliary aides or accommodation
Utility Education Programs	Contact information for auxiliary aides or accommodations not provided	Provide contact information for auxiliary aides or accommodation

4.6 PROCEDURES

The Emergency Management Plan and the Community Development Citizen Participation Plan were reviewed as part of this plan. The Emergency Management Plan includes all of Brazos County. Emergency management procedures often have only a brief mention of serving people with special needs; however, details need to be provided on how people with disabilities will be accommodated. The Emergency Management Plan was reviewed to determine who will help accommodate people with disabilities, how much training is needed, how medications will be stored, how service animals will be handled, and other relevant items. The Community Development Citizen Participation Plan was reviewed to ensure all citizens have equal opportunity for participation in their community and how that will occur.

Code enforcement is particularly important to people with disabilities because often the accessible features of a community are blocked by unaware citizens. Therefore, the policies and procedures in place were reviewed to ensure all citizens have equal access to the amenities offered by the City.

Self-Evaluation Findings

The Brazos County Emergency Management Plan Annex C (Shelter & Mass Care) and Annex E (Evacuation) generally include persons with disabilities but do not provide detailed information regarding accessible shelters or the evacuation procedures relating specifically to persons with disabilities. During the review of the plans, it was determined that most of the designated shelters are selected and evaluated by the American Red Cross. The Red Cross has a checklist to ensure that shelters are accessible. At this time, the City does not operate any shelters.

No issues were identified with the Community Development Citizen Participation Plan.

Recommended Actions:

Should the City designate and operate emergency evacuation shelters, the City must develop a process to evaluate potential shelters for accessibility to people with disabilities and to ensure compliance with applicable laws.

4.7 POLICIES

The City has several facilities available for rent through the Park and Recreation and Fire Departments. The policies regarding use of City owned facilities and land were reviewed including the Parks and Recreation Facility Use Agreement.

This document was reviewed to ensure participants with disabilities have full participation in events hosted on land owned by the City by putting the responsibility for accessibility on the vendor or group leasing the property from the City.

Self-Evaluation Findings

The Parks and Recreation Facility Use Agreement does not provide contact information for auxiliary aids or accommodations.

Recommended Actions:

The Parks and Recreation Facility Use Agreement should be modified or amended to include a special event application that provides ADA Title III awareness information to the private entity hosting any events on the public property as well as a checklist of basic elements that must be accessible if they are to be provided. This application should then be submitted to the City as proof that the private entity has been made aware of their requirements under Title III of the ADA.

The Parks and Recreation Facility Use Agreement should provide contact information for auxiliary aids or accommodations.

4.8 PLANNING DOCUMENTS

Planning documents were reviewed to ensure accessibility is an essential part of the plans and incorporated from the beginning of the planning process. The documents were evaluated for consideration of accessibility relating to providing accessible connections where needed, constructing new sidewalks, or reconstructing sidewalks to meet accessibility requirements.

The following planning documents were reviewed as part of this project:

- Comprehensive Plan
- Neighborhood, District and Corridor Plans
 - South Knoll Area Neighborhood Plan
 - Wellborn Community Plan
 - Medical District Master Plan
 - Southside Area Neighborhood Plan
 - Eastgate Neighborhood Plan
 - Central College Station Neighborhood Plan
- Bicycle, Pedestrian and Greenways Master Plan

Self-Evaluation Findings

No issues were found upon review of these documents.

4.9 CITY ORDINANCES

City Ordinances were reviewed to ensure there is no discriminatory language and ensure there are no ordinances that could be interpreted to be discriminatory. The following chapters of the City's Municipal Code received a full evaluation during this process due to their relevance to Title II:

- Chapter 1, Section 29 – City Cemeteries Rules and Regulations
- Chapter 3 – Right-of-Way Maintenance
- Chapter 10 – Traffic Code
- Chapter 12 – Unified Development Ordinance

Self-Evaluation Findings

No issues were found upon review of the language contained in these chapters.

4.10 DESIGN STANDARDS

The 2012 Bryan/College Station Unified Design Guidelines, Technical Specifications, and Standard Construction Details were reviewed for consistency with the current 2010 ADA Standards, Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG), and the 2010 Texas Accessibility Standards (TAS).

Self-Evaluation Findings

No issues were identified within the Design Guidelines or Technical Specifications; however, some issues were found within the Standard Street Construction Details. The sidewalk details refer to an outdated section of the Texas Accessibility Standards. All references to the Texas Accessibility Standards should reflect the 2012 Texas Accessibility Standards. Neither the 2010 Americans with Disabilities Act Standards for Accessible design nor do the 2012 Texas Accessibility Standards provide any requirements for curb ramps within the public right-of-way.

Recommended Actions:

It is recommended that the Public Right of Way Accessibility Guidelines be adopted and utilized for curb ramp designs within the public right-of-way, specifically detectable warning location. **Table 2** summarizes the Design Standard issues and associated recommendations.

Table 2. Summary of Design Standard Issues

Design Standard	Page	Issue	Recommendation
Sidewalk Details	SW2	Detectable Warnings General Note 1 refers to section 4.29 of the Texas Accessibility Standards.	Revise to refer to the 2012 Texas Accessibility Standards
Sidewalk Details	SW2	Detail SW2-01 - The detectable warning must extend the full width of the ramp surface. The 4" maximum and usual side border is not permitted. The 6" min/10" max dimension from the front of curb is not permitted. 16 TAC 68.102 does not permit a 6"-10" setback. 16 TAC 68.102 only permits the setback at diagonal curb ramps where the detectable warning following the curve of the corner.	Revise detail so that detectable warning extends the full width of the curb ramp. Current TAS and ADAAG do not provide any requirements regarding acceptable detectable warning borders. It is recommended to use PROWAG R305.2, which state "Some detectable warning products require a concrete border for proper installation. The concrete border should not exceed 51 mm (2 in)." The detectable warning must begin at back of curb.
Sidewalk Details	SW2	SW2-03 - The detectable paver detail must fully comply with section 705 of the 2012 Texas Accessibility Standards. Full compliance could not be determined based on the dimensions shown here.	Verify that the pavers used fully comply with section 705 regarding dome shape, height and spacing.
Sidewalk Details	SW3	SW3-00 to SW3-05 - Where the ends of the bottom grade break are behind the back of curb and the distance from either end of the bottom grade brake to the back of curb is 1.5 m (5.0 ft) or less, detectable warning surfaces shall be placed on the ramp run within one dome spacing of the bottom grade break. Where the ends of the bottom grade break are behind the back of curb and the distance from either end of the bottom grade brake to the back of curb is more than 1.5 m (5.0 ft), detectable warning surfaces shall be placed on the lower landing at the back of curb. The detectable warning must extend the full width of the curb ramp.	The three details must be revised to indicate the grade break requirements. Current TAS and ADAAG do not address this type of condition. It is recommended that the requirements of PROWAG R305.2.1 regarding perpendicular curb ramps be used.
Traffic Signal Details	3	No design standard is provided for 30" x 48" level clear floor that is required to serve the pedestrian push buttons.	Provide a standard detail showing the required level clear floor space adjacent to the pedestrian push button.

4.11 FACILITIES

A variety of City-owned facilities were evaluated in this first phase of the Plan to identify any physical barriers to City programs, services, and activities people with disabilities might encounter.

Field crews equipped with measuring devices and Global Position System (GPS)-based data collection forms performed the infrastructure evaluation process. The evaluations identified physical barriers in City facilities based on the 2010 ADA Standards and the Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG). The crews recorded detailed measurements of existing conditions, planning-level recommendations for removing physical barriers, and photos of each facility. The self-evaluation reports included these details and information such as if a specific facility was near a significant pedestrian attractor (e.g., government office, medical facility, school, etc.). This information guided the Consultant team and City staff in prioritizing accessibility modifications. The following facility types were evaluated:

- Buildings (3)
- Parks (2)
- Signalized intersections (20)
- Sidewalk corridors (3 miles)

Summary reports were developed for each facility type. The reports identify the compliance status of each facility with regard to federal standards and include the following elements:

- List of facilities that comply with current ADA standards
- List of facilities that do not comply with current ADA standards
- Recommended actions to achieve compliance for each facility
- Prioritized list of modifications using criteria the Consultant and City staff developed
- “Cost report” that assigns conceptual budget estimates to each recommended action
- Photolog summary for signalized and unsignalized intersections as well as issues along sidewalk corridors (sidewalk photos provided in the GIS database only).

Self-evaluation summary reports are provided in **Appendix D**.

4.11.1 BUILDINGS

Field crews evaluated three buildings, including parking lots, in the project's first phase. The buildings were:

- Northgate Garage (309 College Main)
- Municipal Court (300 Krenek Tap Road)
- Utility Customer Service (310 Krenek Tap Road)

A map of all evaluated buildings is included as **Figure 1**.

Crews evaluated the path of travel from parking lots to buildings, access into each building, signage, drinking fountains, telephones, restrooms, and counter heights. The self-evaluation reports for these buildings can be found in **Appendix D**.

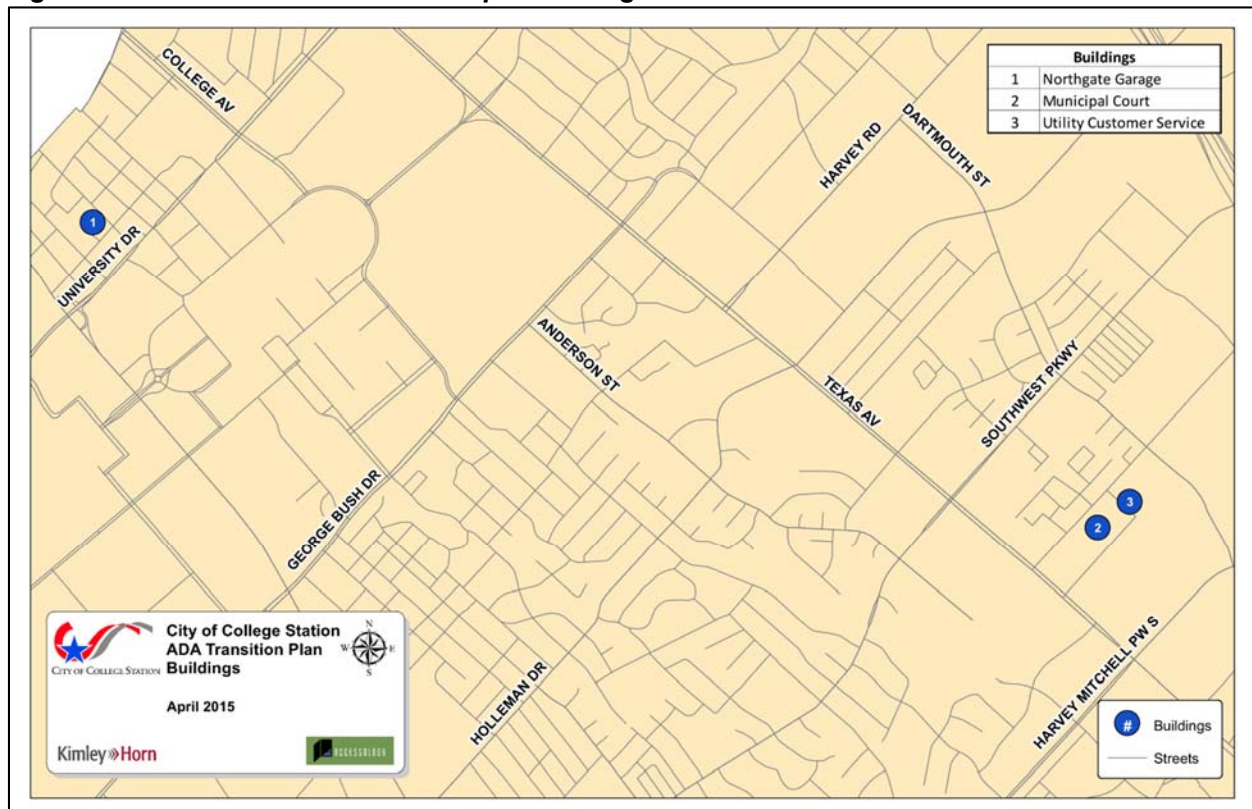
Self-Evaluation Findings

The three buildings included in this study were constructed after 1990. Each building has elements that require modifications to reach full compliance with current accessibility standards.

Recommended Actions:

Self-evaluation reports include recommendations for modifications that will address accessibility and architectural barriers

Figure 1. Self-Evaluation Facilities Map – Buildings



4.11.2 PARKS

Crews evaluated two municipal parks in the first phase of this project.

- Brian Bachmann Community Park (1600 Rock Prairie Road)
- Stephen C. Beachy Central Park (1000 Krenek Tap Road)

A map of all evaluated parks is included as **Figure 2**.

The evaluation included parking lots, paths of travel from the parking lots to park amenities, access into facilities, signage, drinking fountains and restrooms. The self-evaluation reports for these parks are in **Appendix D**.

Self-Evaluation Findings

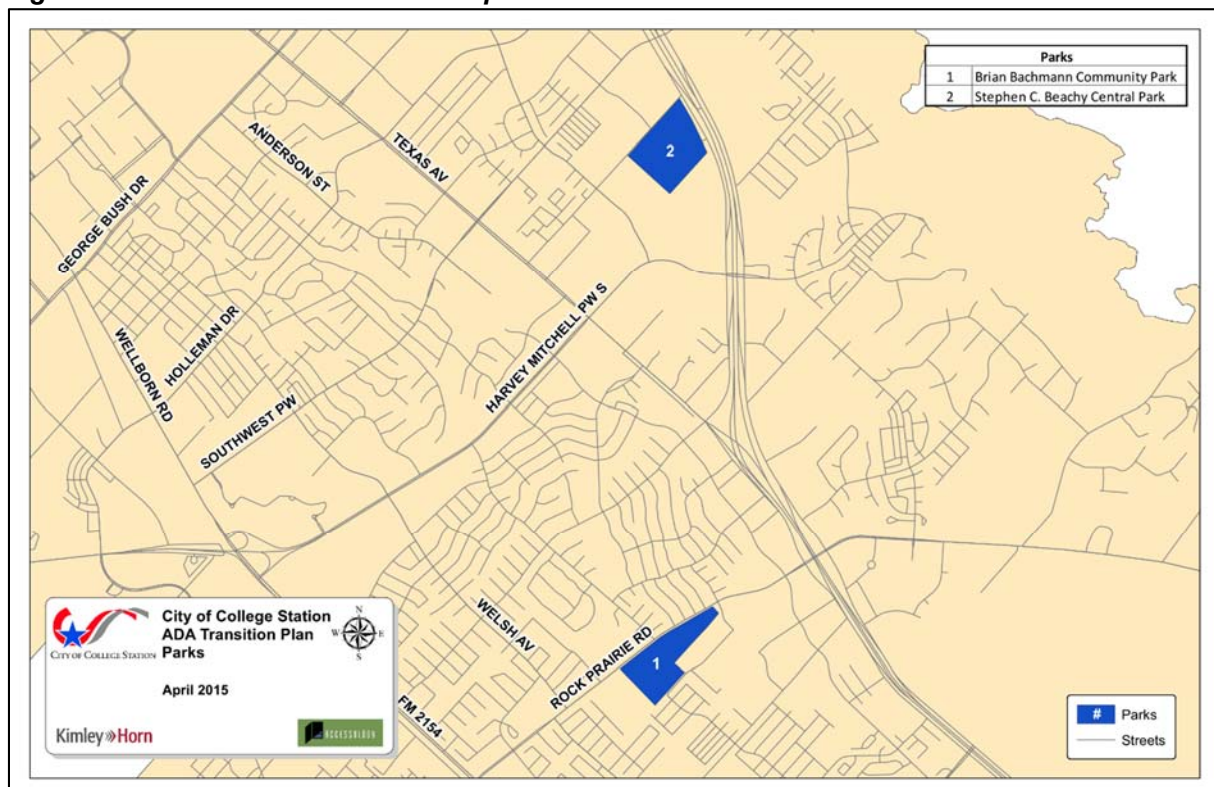
Common issues at these parks include:

- Insufficient accessible parking
- Paths from parking areas to park amenities have excessive cross slopes and level changes
- Park amenities such as picnic areas are not accessible or located along accessible paths
- Soccer fields do not have accessible wheelchair seating space at bleachers

Recommended Actions:

The self-evaluation reports include detailed recommendations for modifications to address accessibility and architectural barriers.

Figure 2. Self-Evaluation Facilities Map – Parks



4.11.3 SIGNALIZED INTERSECTIONS

Crews identified and evaluated twenty signalized intersections, cataloging conditions and measurements along the pedestrian path of travel, including street crossings, curb ramps and adjacent sidewalks, pedestrian signal equipment and adjacent clear spaces. A map of signalized intersections is included as **Figure 3**.

Self-Evaluation Findings

Common curb ramp issues included the absence of color contrast on curb ramps, excessive flare cross slopes, ponding at the base of curb ramps or in ramp landings or flares, permanent obstructions in the ramps such as utilities and other vertical discontinuities, and temporary obstructions in the ramps such as overgrown vegetation. **Table 3** provides a summary of the curb ramp issues.

More than a third of the valid pedestrian crossings at the inventoried signalized intersections did not have pedestrian push buttons, and a subset of those pedestrian crossings did not have pedestrian signal heads. Recommendations include pedestrian push buttons and signal heads at all valid signalized intersection pedestrian crossings. Common issues associated with the existing pedestrian push buttons included the absence of clear floor space, excessive clear floor space running slopes and cross slopes, and excessive push button offset from the crosswalk. **Table 4** provides a summary of the push button issues.

Recommended Actions:

Detailed recommendations for each intersection are provided in the self-evaluation reports.

Figure 3. Self-Evaluation Facilities Map – Signalized Intersections

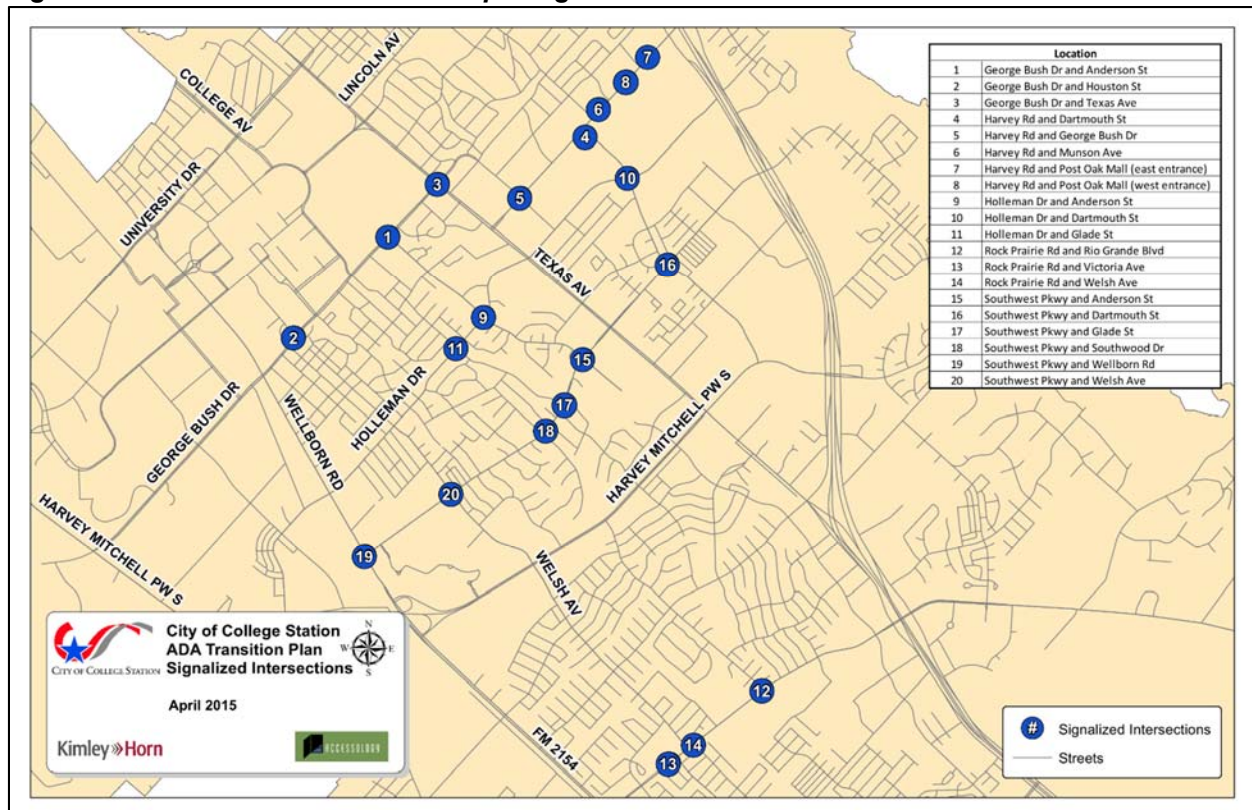


Table 3. Summary of Curb Ramp Issues at Signalized Intersections

Curb Ramp Issue	Number Evaluated	Number Non-Compliant	Percent Non-Compliant
No color contrast	77	53	68.8%
Flare cross slope > 10%	46	29	63.0%
Ponding in ramp, landing, or flares	77	45	58.4%
Obstruction in ramp, landing, or flares	77	44	57.1%
Ramp cross slope > 2%	77	33	42.9%
No texture contrast	77	30	39.0%
No flush transition to roadway	77	29	37.7%
Ramp running slope > 8.3%	77	28	36.4%
Landing running slope > 2%	54	19	35.2%
Ramp counter slope > 5%	77	27	35.1%
Landing cross slope > 2%	54	16	29.6%
Ramp width < 48"	77	22	28.6%
Curbed sides < 90°	31	8	25.8%
No landing	77	19	24.7%
No ramp where ramp is needed	98	17	17.3%
Ramp does not land in crosswalk	77	7	9.1%
No 48" crosswalk extension	61	5	8.2%
Traversable sides	31	2	6.5%

Table 4. Summary of Push Button Issues

Push Button Issue	Number Evaluated	Number Non-Compliant	Percent Non-Compliant
No clear floor space or no access	57	35	61.4%
Clear floor space running slope > 2%	22	13	59.1%
Clear floor space cross slope > 2%	22	12	54.5%
Missing push button where push button is needed	138	53	38.4%
Push button offset from crosswalk > 5'	57	17	29.8%
Missing pedestrian head where pedestrian head is needed	138	28	20.3%
Push button orientation not parallel	57	10	17.5%
Push button height > 48"	57	8	14.0%
Push button offset from curb > 10'	57	7	12.3%
Push button diameter not 2"	57	7	12.3%

4.11.4 SIDEWALK CORRIDORS

Crews evaluated approximately three miles of sidewalk in this project phase, including the south side of George Bush Dr. from Holik Street to Texas Avenue, and the north and south sides of Southwest Parkway from Welsh Avenue to Texas Avenue. Sidewalk corridors were selected based on pedestrian activity and proximity to pedestrian traffic generators. The City expects future ADA Transition Plan phases to include additional evaluations of sidewalks, with arterial roadways with sidewalks evaluated first and followed by collector and local roads with sidewalks. A map of the sidewalk corridors evaluated is included as **Figure 4**.

Self-Evaluation Findings

The sidewalk corridor evaluations included conditions and measurements along the pedestrian path of travel, which includes the sidewalk, curb ramps, pedestrian crossings at driveway openings, and pedestrian crossings at unsignalized intersections with cross streets. Common issues along the sidewalk corridor were excessive sidewalk cross slopes, vertical discontinuities that caused excessive level changes, excessive driveway and cross street cross slopes, permanent obstructions in the sidewalk such as power poles or utilities, and temporary obstructions in the sidewalk or path of travel such as weeds and low hanging branches. Where excessive vegetation was present, field crews attempted to assess the condition of the underlying sidewalk. Where possible, the condition of the underlying sidewalk was recorded; however, the City of College Station may find additional issues with the sidewalk once the temporary obstruction is removed.

Common curb ramps issues at unsignalized intersections along the sidewalk corridors included excessive landing area cross slopes, excessive ramp cross slopes, non-compliant curbed sides, ramps having no presence of color contrast, and ramps that are too narrow at their most constrained point of access. A summary these issues is provided in **Table 5**. Non-compliant curb ramps, sidewalk, and pedestrian paths of travel along driveways and street crossings at unsignalized interactions were recommended to be removed and replaced. Where sidewalks lead up to the curb at an intersection, both parallel and perpendicular to the project corridor, curb ramps were recommended to be installed. Where sidewalks parallel to the project corridor lead up to the curb at a driveway, curbs ramps were recommended to be installed.

The ADA of 1990, Section 35.150, Existing Facilities, requires that the Transition Plan include a schedule for providing curb ramps or other sloped area at existing pedestrian walkways, which applies to all facilities constructed prior to 1992. For any sidewalk installations constructed from 1992 to March 15, 2012, the curb ramps should have been installed as part of the sidewalk construction project per the 1991 Standards for Accessible Design, Section 4.7 Curb Ramp, which states, “curb ramps complying with 4.7 shall be provided wherever an accessible route crosses a curb.” For sidewalk installations constructed on or after March 15, 2012 similar guidance is provided in the 2010 Standards for Accessible Design, Section 35.151 of 28 CFR Part 35, New construction and alterations, which states, “newly constructed or altered street level pedestrian walkways must contain curb ramps or other sloped area at any intersection having curb or other sloped area at intersections to streets, roads, or highways.”

Recommended Actions:

Detailed recommendations for each sidewalk corridor and unsignalized intersection are provided in the self-evaluation reports in **Appendix D**.

Figure 4. Self-Evaluation Facilities Map – Sidewalk Corridors

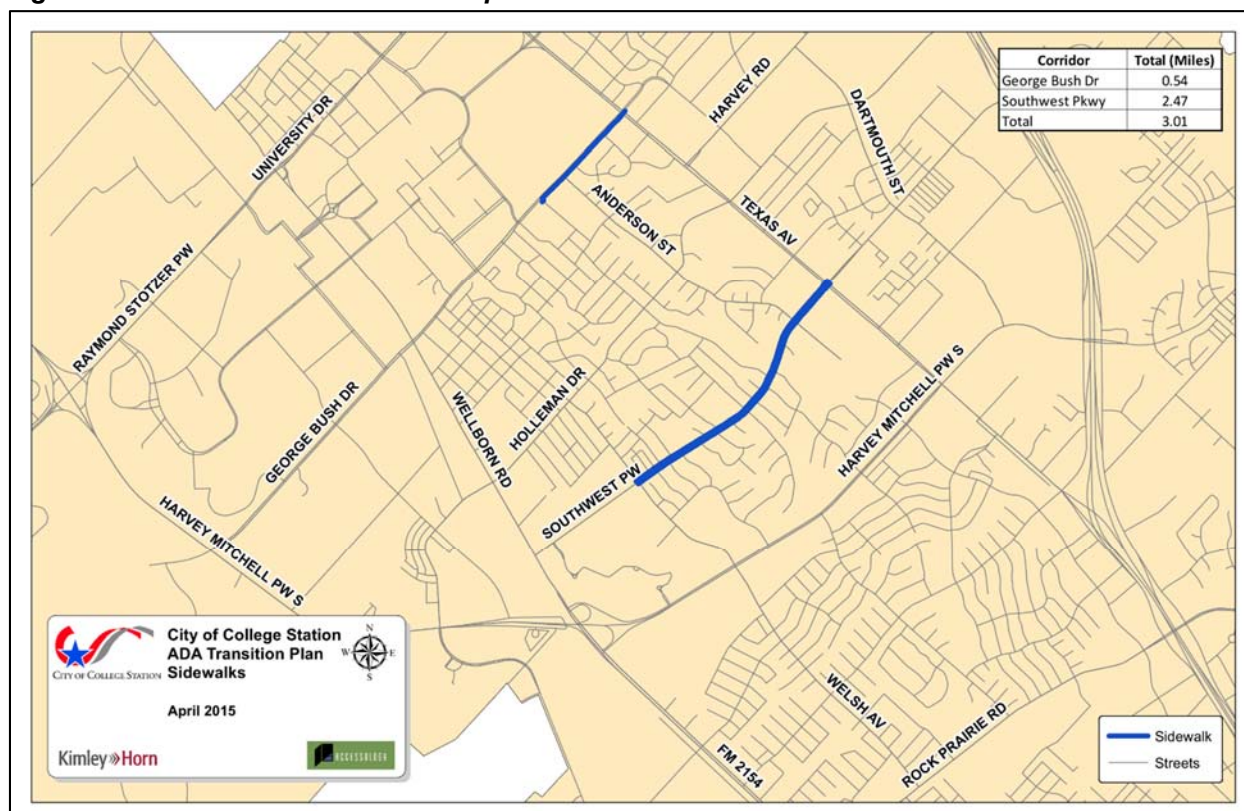


Table 5. Summary of Curb Ramp Issues at Unsignalized Intersections

Curb Ramp Issue	Number Evaluated	Number Non-Compliant	Percent Non-Compliant
Landing cross slope > 2%	82	44	53.7%
Ramp cross slope > 2%	84	45	53.6%
Curbed sides < 90°	66	34	51.5%
No color contrast	84	38	45.2%
Ramp width < 48"	84	38	45.2%
Flare cross slope > 10%	18	8	44.4%
No flush transition to roadway	84	30	35.7%
Landing running slope > 2%	82	20	24.4%
No texture contrast	84	19	22.6%
Obstruction in ramp, landing, or flares	84	15	17.9%
Ponding in ramp, landing, or flares	84	15	17.9%
Ramp running slope > 8.3%	84	15	17.9%
Ramp counter slope > 5%	84	12	14.3%
No ramp where ramp is needed	115	5	4.3%
Ramp does not land in crosswalk	84	3	3.6%
No landing	84	2	2.4%
Traversable sides	66	1	1.5%
No 48" crosswalk extension	82	0	0.0%

4.12 PRIORITIZATION

The following sections outline the prioritization factors and results of the prioritization for buildings, parks, signalized intersections, sidewalks, and unsignalized intersections. Each facility type has a different set of parameters to establish the prioritization for improvements. These prioritization factors were taken into consideration when developing the implementation plan for the proposed improvements.

4.12.1 PRIORITIZATION FACTORS FOR FACILITIES

Evaluated buildings were prioritized on a 12-point scale, which is defined in **Table 6**. This prioritization methodology has been developed by the consultant team to aid the City in determining how the buildings should be prioritized for improvements based on the severity of non-compliance with ADA.

Parks were prioritized on a 12-point scale, which is defined in **Table 7**.

Signalized intersections were prioritized on a 13-point scale. The 13-point scale, which is used to prioritize both signalized and unsignalized intersections, is defined in **Table 8**. This prioritization methodology has been developed by the consultant team to aid the City in determining which signalized intersections should be prioritized for improvements over other signalized intersections based on the severity of non-compliance with ADA.

Sidewalk corridors were prioritized on a 3-point scale and were given a priority of either “High”, “Medium”, “Low” based on the severity of non-compliance, which is defined in **Table 9**.

Table 6. Prioritization Factors for Buildings

Priority	Criteria
1 (high)	<ul style="list-style-type: none"> • Safety Issues (dangerously steep slopes, protruding objects, etc.) • Citizen grievances
2 (high)	<ul style="list-style-type: none"> • New construction • Older construction severely out of compliance (see Accessible Route list for sidewalks, curb ramps/ramps) • Alterations that did not bring required elements into compliance (adding a break room or restroom that isn't compliant)
3 (high)	<ul style="list-style-type: none"> • No accessible parking • No accessible route from parking to building entrances • No accessible route to adjacent sidewalk system, when provided • Severely non-compliant parking (bad slopes, gravel surface, etc.)
4 (high)	<ul style="list-style-type: none"> • No accessible route to covered areas inside buildings on site (no elevator to upper areas, steps only, narrow doors, etc.) • No accessible counter heights (reception counters, utilities counters, etc.) • No access to public areas (coffee bars, break rooms, conference rooms, etc.) • No access to City Council chambers • No access to court amenities
5 (medium)	<ul style="list-style-type: none"> • Non-compliant parking (structural solution) • Non-compliant public access spaces (coffee bars, break rooms, conference rooms, etc.) • Non-compliant interior door clearances • Non-compliant restroom amenities (water closet, urinal, lavatory)
6 (medium)	Non-compliant showers/changing areas
7 (medium)	Accessible route with moderate access issues (level changes that can be ground down or fitted with device)
8 (medium)	<ul style="list-style-type: none"> • No accessible drinking fountains • No accessible telephones
9 (low)	Non-compliant parking (striping, signage)
10 (low)	Minor level changes, gaps or cracks in accessible route
11 (low)	Non-compliant drinking fountains
12 (low)	Non-compliant public phones

Table 7. Prioritization Factors for Parks

Priority	Criteria
1 (high)	<ul style="list-style-type: none"> Grievance and Safety Issues (dangerously steep slopes, protruding objects, etc.) Citizen grievances
2 (high)	<ul style="list-style-type: none"> New construction Older construction severely out of compliance (see Accessible Route list for sidewalks, curb ramps/ramps) Alterations that did not bring required elements into compliance (replacing playground surfacing with non-compliant material)
3 (high)	<ul style="list-style-type: none"> No accessible parking No accessible route from parking to park entrance, sports complex or amenity served No accessible entrance or sidewalk system to and around each amenity provided Severely non-compliant parking (bad slopes, gravel surface, etc.)
4 (high)	<ul style="list-style-type: none"> There is a sidewalk system around the park, but it does not connect to each amenity. (picnic tables, fishing piers, park benches, baseball, softball, disc golf, tennis, basketball, soccer, horseshoe, splash pads, skate parks, etc.) No accessible route to each amenity, inside buildings on site (no elevator to upper areas, steps only, narrow doors, etc.) No accessible counter heights (concession stands, ticket booths, pool admittance, etc.) No access to public areas (coffee bars, break rooms, conference rooms, etc.) No access to dug outs. No accessible showers, benches, changing areas Seating provided, but none accessible
5 (medium)	<ul style="list-style-type: none"> Non-compliant parking (structural solution) Non-compliant playground surface Non-compliant playground equipment Non-compliant public access spaces (coffee bars, break rooms, conference rooms, etc.) Non-compliant interior door clearances Non-compliant restroom amenities (water closet, urinal, lavatory)
6 (medium)	<ul style="list-style-type: none"> Non-compliant dug outs at ball fields Non-compliant showers/changing areas
7 (medium)	Accessible seating not integrated or on sloped area
8 (medium)	<ul style="list-style-type: none"> No accessible drinking fountains No accessible telephones
9 (low)	Non-compliant parking (striping, signage)
10 (low)	Minor level changes, gaps or cracks in accessible route
11 (low)	Non-compliant drinking fountains
12 (low)	Non-compliant public phones

Table 8. Prioritization Factors for Signalized and Unsignalized Intersections

Priority	Criteria
1 (high)	Complaint filed on curb ramp or intersection or known crash at site
2 (high)	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> • Running slope > 12% • Cross slope > 7% • Obstruction to or in the ramp or landing • Level change > ¼ inch at the bottom of the curb ramp • No detectable warnings AND within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
3 (high)	<ul style="list-style-type: none"> • No curb ramp where sidewalk or pedestrian path exists AND within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
4 (high)	No curb ramps but striped crosswalk exists
5 (medium)	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> • Running slope > 12% • Cross slope > 7% • Obstruction to or in the ramp or landing • Level change > ¼ inch at the bottom of the curb ramp • No detectable warnings AND NOT within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
6 (medium)	<ul style="list-style-type: none"> • No curb ramp where sidewalk or pedestrian path exists AND NOT within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
7 (medium)	One curb ramp per corner and another is needed to serve the other crossing direction
8 (medium)	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> • Cross slope > 5% • Width < 36 inches • Median/island crossings that are inaccessible
9 (low)	Existing curb ramp with either running slope between 8.3% and 11.9% or insufficient landing
10 (low)	Existing diagonal curb ramp without a 48 inch extension in the crosswalk
11 (low)	Existing pedestrian push button is not accessible from the sidewalk and/or ramp
12 (low)	Existing curb ramp with returned curbs where pedestrian travel across the curb is not protected
13 (low)	All other intersections not prioritized above

Table 9. Prioritization Factors for Sidewalk Corridors

Criteria	Priority		
	1 (high)	2 (medium)	3 (low)
Cross slope of sidewalk is greater than 2%	Value > 3.5	$3.5 \geq \text{Value} > 2.0$	
Width of sidewalk is less than 48 inches	Value ≤ 36.0	$36.0 < \text{Value} < 42.0$	$42.0 < \text{Value} < 48.0$
Obstruction present along sidewalk	Obstruction - Permanent	Obstruction - Temporary	
Heaving, Sinking, or Cracking present on sidewalk	Heaving Sinking Cracking		
Ponding on sidewalk		Ponding	
Missing Sidewalk			Missing Sidewalk
Cross street cross slope is greater than 2%	Value > 6.0	$6.0 \geq \text{Value} \geq 4.0$	$4.0 > \text{Value} > 2.0$
Cross street running slope is greater than 5%	Value > 7.0	$7.0 \geq \text{Value} \geq 6.0$	$6.0 > \text{Value} > 5.0$
Driveway sidewalk width is less than 48 inches	Value ≤ 36.0	$36.0 < \text{Value} < 42.0$	$42.0 < \text{Value} < 48.0$
Driveway (or sidewalk if applicable) cross slope is greater than 2%	Value > 6.0	$6.0 \geq \text{Value} \geq 4.0$	$4.0 > \text{Value} > 2.0$
Driveway (or sidewalk if applicable) condition is poor or poor dangerous	Poor-Dangerous (elevation change greater than $\frac{1}{2}$ inch or gaps greater than 1 inch)	Poor (elevation change between $\frac{1}{4}$ inch and $\frac{1}{2}$ inch or gaps between $\frac{1}{2}$ inch and 1 inch)	

Self-Evaluation Findings

Table 10, Table 11, and Table 12 provide summaries of the prioritization classifications for signalized intersections, sidewalks, and unsignalized intersections, respectively.

Table 10. Prioritization Summary for Signalized Intersections

Priority	Number of Intersections
1 (high)	-
2 (high)	11
3 (high)	-
4 (high)	1
5 (medium)	6
6 (medium)	-
7 (medium)	-
8 (medium)	-
9 (low)	-
10 (low)	-
11 (low)	1
12 (low)	-
13 (low)	1
Total	20

Table 11. Prioritization Summary for Sidewalk Corridors

Line type	Length (miles) by Priority				
	1 (high)	2 (medium)	3 (low)	Compliant	Total
Sidewalk Line	0.56	0.78	0.09	0.75	2.18
Sidewalk Issues (including missing sidewalk)	0.26	0.04	-	-	0.30
Driveways	0.10	0.04	0.05	0.02	0.22
Cross Streets	-	0.02	0.09	0.21	0.31
Total	0.92	0.89	0.23	0.98	3.01

Table 12. Prioritization Summary for Unsignalized Intersections

Priority	Number of Intersections
1 (high)	-
2 (high)	18
3 (high)	-
4 (high)	-
5 (medium)	11
6 (medium)	-
7 (medium)	-
8 (medium)	-
9 (low)	7
10 (low)	-
11 (low)	-
12 (low)	-
13 (low)	1
Total	37

4.13 CONCLUSION/ACTION LOG

The City is taking the actions referenced above and will continue to look for and remedy barriers to access in an effort to ensure that the citizens of the City of College Station with disabilities are given access to the City's services, programs, and activities.

To confirm follow-up on corrective actions required under the Transition Plan, the City will institute an ADA Action Log, documenting its efforts of compliance with the ADA. At a minimum, the Action Log will identify items that are not ADA compliant and will include anticipated completion dates. The ADA Action Log will be updated on an annual basis and will be available upon request.

5.0 PHASE ONE FACILITY PROPOSED COSTS AND SCHEDULE

5.1 FACILITIES COST PROJECTION OVERVIEW

In order to identify funding sources and develop a reasonable implementation schedule, cost projection summaries for the initial phase were developed for each barrier type. To develop these summaries, recent bid tabulations from Texas Department of Transportation (TxDOT) construction projects, along with consultants experience with similar types of projects, were the basis for the unit prices used to calculate the improvement costs. A contingency percentage (20%) was added to the subtotal to account for increases in unit prices in the future in addition to an Engineering design percentage (15%). **Table 13** provides a summary of the estimated costs to bring each facility type into compliance.

Table 13. Summary of Facility Costs

Facility Type	Total
3 Buildings	\$81,989
2 Parks	\$722,095
20 Signalized Intersections	\$1,437,000
3 miles of Sidewalk	\$1,115,000
City Totals	\$3,356,084

5.2 IMPLEMENTATION SCHEDULE

An implementation schedule no longer than 15 years is recommended for this phase of the Transition Plan. The City of College Station reserves the right to change the barrier removal priorities on an ongoing basis in order to allow flexibility in accommodating community requests, requests for reasonable modifications from persons with disabilities, and changes in City programs.

It is the intent of the City to have its ADA Coordinator work together with department heads and budget staff to determine the funding sources for barrier removal projects. Once funding is identified, the ADA Coordinator will coordinate the placement of the projects in the Capital Improvement Program to be addressed on a fiscal year basis.

5.3 FUNDING OPPORTUNITIES

Several alternative funding sources are available to the City to address the issues identified in this Transition Plan, including federal and state funding, local funding, and private funding. The following sections detail some different funding source options.

5.3.1 FEDERAL AND STATE FUNDING

Table 14 depicts the various types of federal and state funding available for the City to apply for funding for various improvement. The following agencies and funding options are represented in the chart.

- NHS – National Highway System
- STP – Surface Transportation Program
- HSIP – Highway Safety Improvement Program
- RHC – Railway-Highway Crossing Program
- TAP – Transportation Alternatives Program
- CMAQ – Congestion Mitigation/Air Quality Program
- RTP – Recreational Trails Program
- FTA – Federal Transit Capital, Urban & Rural Funds
- TrE – Transit Enhancements
- BRI – Bridge - Highway Bridge Replacement and Rehabilitation (HBRRP)
- 402 – State and Community Traffic Safety Program
- PLA – State/Metropolitan Planning Funds
- TCSP – Transportation and Community and System Preservation Program
- FLH – Federal Lands Highways Program
- BYW – Scenic Byways
- SRTS – Safe Routes to School (Moving Ahead for Progress in the 21st Century Act (MAP-21) now under TAP)

The majority of these programs are competitive type grants; therefore, the City of College Station is not guaranteed to receive these funds. It will be important for the City to track these programs in order to apply for the funds.

Table 14. Funding Opportunities

Activity	NHS	STP	HSIP	RHC *	TAP	CMAQ *	RTP	FTA	TrE	BRI *	402	PLA	TCSP	FLH	BYW	SRTS
Pedestrian plan		X	X			X						X	X			
Paved shoulders	X	X	X	X	X	X				X			X	X	X	
Shared-use path/trail	X	X	X		X	X	X			X			X	X	X	X
Recreational trail							X							X		
Spot improvement program		X	X		X	X							X			X
Maps		X			X	X					X		X			X
Trail/highway intersection	X	X	X		X	X	X						X	X	X	X
Sidewalks, new or retrofit	X	X	X	X	X	X		X	X	X			X	X	X	X
Crosswalks, new or retrofit	X	X	X	X	X	X		X	X				X	X	X	X
Signal improvements	X	X	X	X	X	X							X			X
Curb cuts and ramps	X	X	X	X	X	X							X			X
Traffic calming		X	X	X									X			X
Safety brochure/book		X			X	X					X		X			X
Training	X	X	X		X	X	X				X		X			X

5.3.2 LOCAL FUNDING

There are several local funding options for the City to consider, including:

- General fund (sales tax and bond issue) – Allocation of annual departmental budgets – requests for larger share to address needs in a more timely fashion
- Maintenance funds
- Special taxing districts
- Tax Increment Financing District (TIF) – A TIF allows cities to create special districts and to make public improvements within those districts that will generate private-sector development. During the development period, the tax base is frozen at the predevelopment level. Property taxes continue to be paid, but taxes derived from increases in assessed values (the tax increment) resulting from new development either go into a special fund created to retire bonds issued to originate the development, or leverage future growth in the district.
- Community Improvement District (CID) – A geographically defined district in which commercial property owners vote to impose a self-tax. Funds are then collected by the taxing authority and given to a board of directors elected by the property owners.
- Tax Allocation District (TAD) – A defined area where real estate property tax monies gathered above a certain threshold for a certain period of time (typically 25 years) to be used a specified improvement. The funds raised from a TAD are placed in a tax-free bond (finance) where the money can continue to grow. These improvements are typically for revitalization and especially to complete redevelopment efforts.
- Sidewalk or Access Improvement Fee
- Transportation User Fee
- Scheduled/Funded CIP projects that are funded through bonds and sales tax
- Community Development Block Grants (CDBG)

5.3.3 PRIVATE FUNDING

Private funding may include local and national foundations, endowments, private development, and private individuals. While obtaining private funding to provide improvements along entire corridors might be difficult, it is important for the City to require private developers to improve pedestrian facilities to current ADA requirements, whether by new development or redevelopment of an existing property.

5.4 UPDATES TO PLAN AND FUTURE PHASES

As a living, ongoing document, the City of College Station's policies, practices, services, programs, activities and facilities will continue to be evaluated beyond the completion of this document. The Plan should be revised to account for any changes. As referenced at the beginning of the document, this Plan only includes the first phase of identifying and removing physical barriers. Additional phases will be needed. Input from the community will help prioritize the evaluation of additional facilities (buildings and right-of-way). The identification of additional barriers with additional phases will also change the prioritization of projects.

APPENDICIES (PROVIDED ON CD)

APPENDIX A: MEETING NOTES

- Focus Group Meeting
- Public Meeting

APPENDIX B: GRIEVANCE PROCESS

- ADA Notice
- Grievance Procedure
- Grievance Form

APPENDIX C: U.S. DEPARTMENT OF JUSTICE EFFECTIVE COMMUNICATION GUIDANCE

APPENDIX D: SELF-EVALUATION REPORTS

- Buildings
- Parks
- Signalized Intersections
- Sidewalk Corridors