

*City of Garland*

# Americans with Disabilities Act (ADA) Self-Evaluation & Transition Plan

**November 2023**

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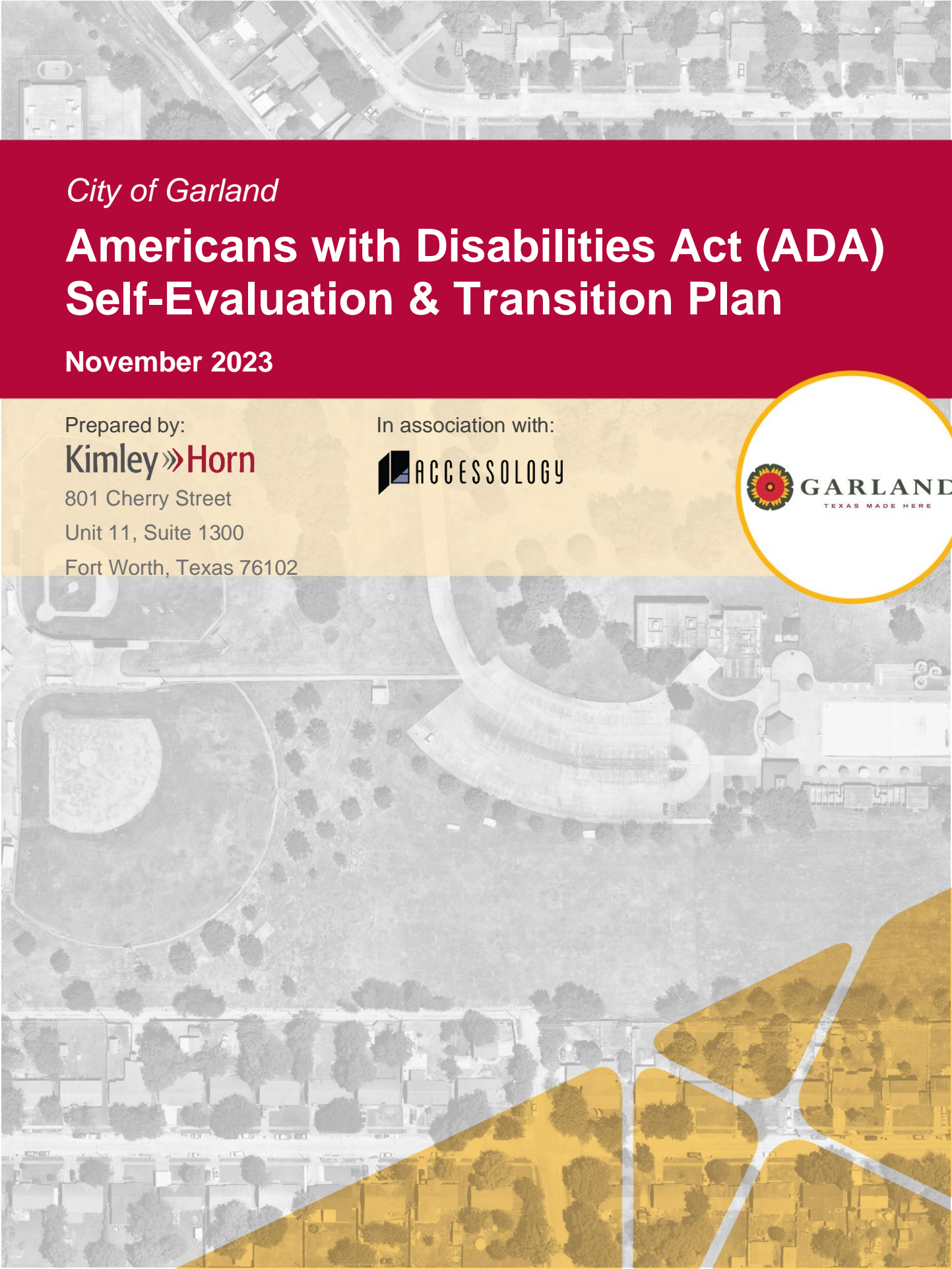
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## Abbreviations

ABA – Architectural Barriers Act

ADA – Americans with Disabilities Act

ADAAG – Americans with Disabilities Act Accessibility Guidelines

ANSI – American National Standards Institute

CFR – Code of Federal Regulations

CIP – Capital Improvement Projects

DOJ – United States Department of Justice

FHWA – Federal Highway Administration

MUTCD – Manual on Uniform Traffic Control Devices

PROWAG – Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way

PSA – Programs, Services, and Activities

RAS – Registered Accessibility Specialist

TAS – Texas Accessibility Standards

TDLR – Texas Department of Licensing and Regulation

TxDOT – Texas Department of Transportation

UFAS – Uniform Federal Accessibility Standards





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# 1.0 INTRODUCTION

## 1.1 Purpose

The purpose of this Americans with Disabilities Act (ADA) Self-Evaluation and Transition Plan is to summarize the activities completed to-date related to ADA compliance and to create a roadmap for the City of Garland to update their ADA Transition Plan. This document serves as an update to the City's 1993 Transition Plan; the original 1993 Transition Plan is available for reference upon request from a member of the public to the City. As part of this update, a prioritization methodology for evaluating and implementing improvements to achieve ADA compliance was developed based on the applicable 2010 ADA Standards and 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG). The details are provided in this document.

This document includes an overview of the ADA and provides recommendations for the City of Garland based on guidance from the Federal Highway Administration (FHWA) and U.S. Department of Justice (DOJ) to improve accessibility for the public.

## 1.2 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, public accommodations, government services, public transportation, and telecommunications. Title II of the ADA also requires that all programs, services, and activities (PSAs) of public entities provide equal access for individuals with disabilities.

The City of Garland will undertake a comprehensive evaluation of its PSAs to determine the extent that individuals with disabilities may be restricted in their access.

## 1.3 ADA Background

The ADA is a civil rights law that prohibits discrimination against individuals with disabilities in all areas of public life, including jobs, schools, transportation, and all public and private places that are open to the general public. The purpose of the law is to make sure that people with disabilities have the same rights and opportunities as everyone else.

The ADA gives civil rights protections to individuals with disabilities similar to those provided to individuals on the basis of race, color, sex, national origin, age, and religion. It guarantees equal opportunity for individuals with disabilities in public accommodations, employment, transportation, state and local government services, and telecommunications. The ADA is divided into five titles (or sections) that relate to different areas of public life.

### Titles of the ADA

- Title I (Employment)
  - Equal Employment Opportunity for Individuals with Disabilities
- Title II (State and Local government)
  - Nondiscrimination on the Basis of Disability in State and Local Government Services
- Title III (Public Accommodations)
  - Nondiscrimination on the Basis of Disability by Public Accommodations and in Commercial Facilities
- Title IV (Telecommunications)



- Title V (Miscellaneous Provisions)

Federal statutes that communicated the underlying principles of the ADA date back to 1968, with major updates occurring as follows:

Timeline of Accessibility Laws and Statutes:

- Architectural Barriers Act (ABA – originated 1968)
- Rehabilitation Act (1973) – Section 504 (49 CFR Part 27)
- Civil Rights Restoration Act (1987)
- Americans With Disabilities Act (ADA) (1990)
  - DOJ Implementing Regulations (28 CFR 35)

The Architectural Barriers Act of 1968 (ABA) required buildings and on-site facilities designed, constructed, altered, or leased with federal funds to comply with Accessible Design Standards which were maintained by the American National Standards Institute (ANSI) and were replaced by the Uniform Federal Accessibility Standards (UFAS) after 1982. These guidelines were updated and combined to form the Americans with Disabilities Act Accessibility Guidelines (ADAAG) and in 2004, further supplemented in 2007 and adopted by DOJ in 2010.

The Rehabilitation Act of 1973 introduced section 504, which prohibited discrimination in programs and activities that used federal funding. It also required curb ramps to be included in federal-aid projects.

The Civil Rights Restoration Act of 1987 clarified the intent of many nondiscrimination laws and statutes by stating that if an entity receives federal funds in any of its programs and activities, all operations of that entity are subject to the requirements of non-discrimination laws and statutes whether they are federally funded or not. In short, the Restoration Act extended the reach of Section 504 to the entire operation of federal recipients and subrecipients.

The ADA of 1990 is the current civil rights law that prohibits discrimination against persons with disabilities in all aspects of life. The ADA applies to all entities (public, private, et al) regardless of funding source. Similar to the ABA, the ADA primarily pertains to buildings and site elements that are outside the public rights-of-way. The requirements of ADA closely mirror those of Section 504. In 2011 the U.S. Access Board developed PROWAG guidelines for public rights-of-way elements. These guidelines address various issues, including access for blind pedestrians at street crossings, wheelchair access to on-street parking, and various constraints posed by space limitations, roadway design practices, slope, and terrain. These guidelines provide information for pedestrian access to sidewalks and streets, including crosswalks, curb ramps, street furnishings, pedestrian signals, parking, and other components of public rights-of-way.



## **1.4 ADA Self-Evaluation and Transition Plan Development Requirements and Process**

The City of Garland is obligated to observe all requirements of Title I in its employment practices; Title II in its policies, programs, and services; any parts of Titles IV and V that apply to the City and its programs, services, or facilities; and all requirements specified in the 2010 ADA Standards and 2011 PROWAG that apply to facilities and other physical holdings.

Title II has the broadest impact on the City. Included in Title II are administrative requirements for all government entities employing more than 50 people. These administrative requirements are:

- Completion of a Self-Evaluation;
- Development of an ADA complaint procedure;
- Designation of at least one (1) person who is responsible for overseeing Title II compliance; and
- Development of a Transition Plan to schedule the removal of the barriers uncovered by the Self-Evaluation process. The Transition Plan will become a working document until all barriers have been addressed.

This document describes the process developed to complete the evaluation of the City of Garland's PSAs and facilities, provides possible solutions to remove programmatic barriers, and provides an update to the City's 1993 Transition Plan for the modification of facilities and public rights-of way to improve accessibility, which will guide the planning and implementation of necessary program and facility modifications over the next several years. The ADA Self-Evaluation and Transition Plan is significant in that it establishes the City's ongoing commitment to the development and maintenance of PSAs and facilities that accommodate all its citizenry.

## **1.5 Discrimination and 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.

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:

### **1.5.1 Physical Barriers**

- Parking
- Path of travel to, throughout, and between buildings and amenities
- Doors
- Service counters
- Restrooms
- Drinking fountains
- Public telephones
- Path of travel along sidewalk corridors within the public rights-of-way
- Access to pedestrian equipment at signalized intersections





### **1.5.2 Programmatic Barriers**

- Building signage
- Customer communication and interaction
- Non-compliant sidewalks or curb ramps
- Emergency notifications, alarms, and visible signals
- Participation opportunities for City sponsored events

### **1.5.3 Ongoing Accessibility Improvements**

City PSAs and facilities evaluated during the Self-Evaluation will continue to be evaluated on an ongoing basis, and the ADA Transition Plan Update will be revised to account for changes that have been or will be completed since the initial Self-Evaluation. This Plan will be posted on the City's website for review and consideration by the public.

### **1.5.4 City of Garland Approach**

The purpose of the Transition Plan is to provide the framework for achieving equal access to the City of Garland's programs, services, and activities within a reasonable timeframe. The City's elected officials and staff believe that accommodating persons with disabilities is essential to good customer service, ensures the quality of life Garland residents seek to enjoy, and guides future improvements. This Plan has been prepared after careful study of the City's programs, services, activities, and completion of compliance evaluations for a select number of City facilities.

The City of Garland shall make reasonable modifications in PSAs when the modifications are necessary to avoid discrimination based on disability, unless the City can demonstrate that making the modifications will fundamentally alter the nature of the program, service, or activity. The City of Garland will not place surcharges on individuals with disabilities to cover the cost involved in making PSAs accessible.

### **1.5.5 Exceptions and Exemptions**

A municipality is not required to take any action that would create any undue financial or administrative burden for the public entity, create a hazardous condition for other people, or threaten or destroy the historic significance of a historic property.

In determining whether an alteration would impose an undue financial or administrative burden on a covered entity, factors to be considered include: (i) the nature and cost of the alteration needed; (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.

In determining whether an alteration would threaten or destroy the historic significance of a historic property, the City should first confirm if the property is on the National Register of Historic Places. Based on a search of the National Register of Historic Places NPGallery Database (<https://npgallery.nps.gov/nrhp>) and the associated geodatabase (<https://irma.nps.gov/DataStore/Reference/Profile/2210280>), there are no registered historical places within the City of Garland, but there may be other documentation available not provided on these websites.



A municipality 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 generate undue financial or administrative burden, create a hazardous condition for other people, or threaten or destroy the historic significance of a historic property, a municipality 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, a municipality 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.

## **1.6 New Construction and Alterations**

If the start date for construction is on or after March 15, 2012, all newly constructed or altered state and local government facilities shall comply with the 2010 ADA Standards for Accessible Design. 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. State and local government facilities are held to the accessibility standard that was in place at the time of construction. Any facility built before March 15, 2012, will need to have altered areas brought into compliance with the current standard at the time the alterations are made to the facility.

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 Code of Federal Regulations (CFR) 35.151 and the 2004 Americans with Disabilities Act Accessibility Guidelines (ADAAG). However, the FHWA and DOJ recommend using 2011 PROWAG for designing facilities within the public rights-of-way as a best practice until it is adopted at the federal level. Additionally, the Texas Department of Transportation (TxDOT) has adopted PROWAG and incorporated the guidelines into design standards for pedestrian facilities. The Manual on Uniform Traffic Control Devices (MUTCD) is also incorporated by reference within 2011 PROWAG. It is recommended that the City of Garland adopt PROWAG so that it becomes an enforceable document for all City projects within the public rights-of-way, regardless of its adoption status at the state and federal level.

### ***2010 ADA Standards for Accessible Design***

The Department of Justice's revised regulations for Titles II and III of the Americans with Disabilities Act of 1990 (ADA) were published in the Federal Register on September 15, 2010. These regulations adopted revised, enforceable accessibility standards called the 2010 ADA Standards for Accessible Design, "2010 Standards." On March 15, 2012, compliance with the 2010 Standards was required for new construction and alterations under Titles II and III. March 15, 2012, is also the compliance date for using the 2010 Standards for program accessibility and barrier removal.

### ***PROWAG***

The U.S. Access Board is developing new guidelines for public rights-of-way that will address various issues, including access for blind pedestrians at street crossings, wheelchair access to on-street parking, and various constraints posed by space limitations, roadway design practices, slope, and terrain. The new guidelines will cover pedestrian access to sidewalks and streets, including crosswalks, curb ramps, street furnishings, pedestrian signals, parking, and other components of public rights-of-way. These guidelines can provide benefits for elements in the public rights-of-way when compared to the requirements in the 2010 ADA standards, and major differences between the two documents are summarized in the table below.



The 2010 ADA standards are stricter than 2011 PROWAG in terms of pedestrian access route grade and pedestrian street crossing slope. The 2011 PROWAG provides allowances for access route to match street grade when the access route is contained in the right-of-way, as well as, allowing a 5% max cross slope at free-flow approach intersections. See **Table 1** below for a full list of the differences between 2010 ADA Standards and 2011 PROWAG.

**Table 1. Major Differences Between 2010 ADA Standards and 2011 PROWAG**

Element	ADA Standards	PROWAG
<b>Pedestrian Signal Equipment</b>	Not addressed, with exception of operable parts requirements	<ul style="list-style-type: none"> <li>• Incorporates MUTCD by reference</li> <li>• Requires installation of Accessible Pedestrian Signals (APS) and pedestrian pushbuttons when pedestrian signals are newly installed or replaced at signalized intersections</li> </ul>
<b>Pedestrian Access Route Clear Width</b>	36 in. min.	4 ft. min., exclusive of curb
<b>Pedestrian Access Route Grade</b>	5% max.	When contained within a street or highway ROW, grade of pedestrian access route shall not exceed the general grade established for the adjacent street or highway
<b>Detectable Warning Surfaces on Curb Ramps</b>	Required on curb ramps at public streets	Placement guidance provided
<b>Curb Ramp Length</b>	Not addressed	15-ft. run max., to limit indefinitely “chasing grade”
<b>Pedestrian Street Crossing Slope</b>	2% max.	<ul style="list-style-type: none"> <li>• 5% max. for free-flow approaches</li> <li>• Permitted to equal the street or highway grade for midblock crossings</li> </ul>
<b>On-Street Parking</b>	Not addressed	Guidance provided
<b>Perpendicular Curb Ramp Turning Space</b>	3 ft. min. x at least as wide as the curb ramp	<ul style="list-style-type: none"> <li>• 4 ft. min. x 4 ft. min.</li> <li>• 4 ft. min. x 5 ft. min., if constrained at back-of-sidewalk</li> </ul>
<b>Parallel Curb Ramp Turning Space</b>	Not addressed	<ul style="list-style-type: none"> <li>• 4 ft. min. x 4 ft. min.</li> <li>• 4 ft. min. x 5 ft. min., if constrained on two or more sides</li> </ul>
<b>Push Button Clear Space</b>	2% max. slope in all directions	<ul style="list-style-type: none"> <li>• 2% max. cross slope</li> <li>• Running slope consistent with grade of adjacent pedestrian access route</li> </ul>
<b>Shared-Use Paths</b>	Not addressed	Addressed in 2013 PROWAG Supplement



The Board's aim in developing these guidelines is to ensure that access for persons with disabilities is provided wherever a pedestrian way is newly built or altered, and that the same degree of convenience, connection, and safety afforded the public generally is available to pedestrians with disabilities. When these guidelines are adopted, with or without modifications, as accessibility standards in regulations issued by other federal agencies implementing the ADA, Section 504 of the Rehabilitation Act, and the ABA, compliance with those enforceable accessibility standards is mandatory. The final rule was published on August 8, 2023, and becomes effective on September 7, 2023. PROWAG is the recommended best practice and can be considered the state of the practice that could be followed for areas not fully addressed by the 2010 ADA Standards.

In the state of Texas, the Texas Administrative Code (TAC) Chapter 68 (Elimination of Architectural Barriers), Rule §68.102 (Public Right-of-Ways Projects) references compliance with the latest version of PROWAG for elimination of barriers for public rights-of-way projects. The Texas Department of Licensing and Regulation (TDLR) adopted Rule §68.102, effective May 15, 2017. The applicable section of the rule states:

- (a) *For public right-of-way projects, in addition to accepting compliance with applicable TAS requirements, the department will also accept compliance with the Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way, published by the Architectural and Transportation Compliance Board (Access Board) on July 26, 2011, 36 CFR Part 1190 or its final adopted guidelines.*

#### **MUTCD**

Traffic control devices shall be defined as all signs, signals, markings, and other devices used to regulate, warn, or guide traffic, placed on, over, or adjacent to a street, highway, pedestrian facility, bikeway, or private road open to public travel by authority of a public agency or official having jurisdiction, or, in the case of a private road, by authority of the private owner or private official having jurisdiction. The Manual on Uniform Traffic Control Devices is incorporated by reference in 23 CFR, Part 655, Subpart F and shall be recognized as the national standard for all traffic control devices installed on any street, highway, bikeway, or private road open to public travel in accordance with 23 U.S.C. 109(d) and 402(a). The policies and procedures of the FHWA to obtain basic uniformity of traffic control devices shall be as described in 23 CFR 655, Subpart F.

It should be noted that the Texas Manual on Uniform Traffic Control Devices (TMUTCD) is incorporated by reference in the TAC and shall be recognized as the Texas standard for all traffic control devices installed on any public street, highway, bikeway, or private road open to public travel.

#### **2013 Outdoor Developed Areas Guidelines**

The Access Board is responsible for developing accessibility guidelines for the construction and alteration of facilities covered by the ADA and the Architectural Barriers Act (ABA) of 1968, which include outdoor developed areas. The Outdoor Developed Areas guidelines ensure that the facilities are readily accessible to and usable by people with disabilities. The Access Board issued the current guidelines in 2004. The 2004 guidelines contain provisions for several types of recreation facilities, including boating facilities, fishing piers and platforms, golf facilities, play areas, sports facilities, and swimming pools. The Access Board amended the 2004 guidelines in 2013 by adding new provisions for trails, picnic and camping facilities, viewing areas, and beach access routes constructed or altered by federal agencies or by non-federal entities on federal land on behalf of a federal agency pursuant to a concession contract, partnership agreement, or similar arrangement.





The new provisions for trails, picnic and camping facilities, viewing areas, and beach access routes are not included in the DOJ's 2010 ADA Standards and have no legal effect on state and local governments and private entities subject to DOJ's ADA regulations. State and local governments and private entities may, however, use the provisions for guidance when designing trails, picnic and camping facilities, viewing areas, and beach access routes. State and local governments and private entities are cautioned to check with DOJ about using the technical requirements for outdoor recreation access routes, instead of accessible routes, to connect elements at picnic and camping facilities, viewing areas, and trailheads.

## **1.7 Maintenance Versus Alterations**

The United States DOJ has issued a briefing memorandum on clarification of maintenance versus alteration projects. Information contained in the briefing memorandum is below. This clarification regarding when curb ramp installation is required as part of a project can be used as a reference for City of Garland staff who regularly are involved in maintenance and alteration projects.

The 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 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 rights-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 shall include curb ramps within the scope of the project.*

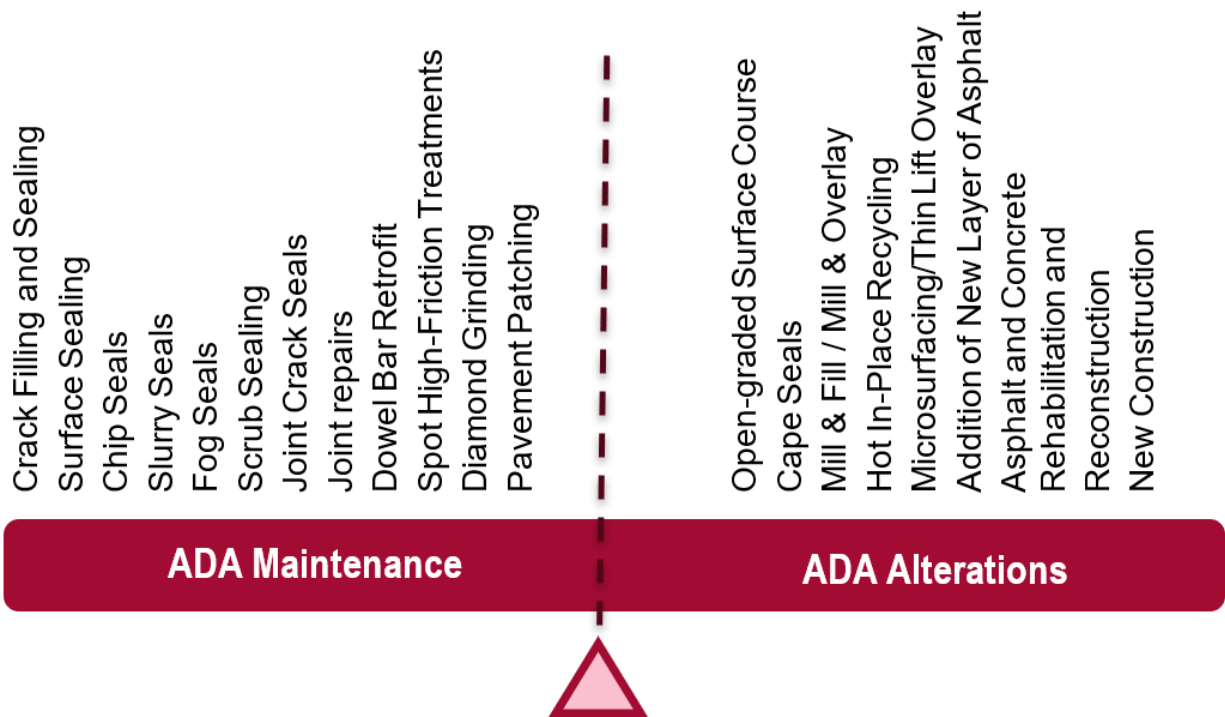
*This clarification provides a single Federal policy that identifies specific asphalt and concrete-pavement repair treatments that are considered to be alterations – requiring installation of curb ramps within the scope of the project – and those that are considered to be maintenance, which do not require curb ramps at the time of the improvement. Figure 1 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 1. Maintenance versus Alteration Projects*



Source: DOJ Briefing Memorandum on Maintenance versus Alteration Projects

### 1.8 FHWA Guidance on Closing Pedestrian Crossings

An alteration that decreases or has the effect of decreasing the accessibility of a facility below the requirements for new construction at the time of the alternation is prohibited. For example, the removal of an existing curb ramp or sidewalk (without equivalent replacement) is prohibited. However, the FHWA has indicated a crossing may be closed 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.

Agencies wishing to close certain intersection crossings should have a reasonable and consistent policy on when to do so written in their Transition Plan or as a standalone document. If safety concerns are established by an engineering study, a pedestrian crossing should not be accommodated for any user. The City of Garland will only consider closing an existing pedestrian crossing if it is determined to be unsafe by an engineering study.



## **1.9 Existing City Programs that Implement ADA Upgrades**

The City of Garland currently implements ADA compliant designs through the following efforts:

- The Public Works Department Street Maintenance Program encompasses curb and gutter, pavement, and sidewalk maintenance, all which improve the pedestrian path of travel in the public rights-of-way and help maintain accessible routes within the City of Garland in an accessible condition.
- The City's Sidewalk Replacement Plan is a Capital Improvement Project (CIP) that began in 2017 and will include the replacement of approximately two (2) miles of sidewalk adjacent to and within proximity of schools, parks, and community centers in the City, including sidewalk adjacent to major and collector roadways and local neighborhood streets.

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## 2.0 PUBLIC OUTREACH

The City **plans to establish** an external ADA Advisory Committee consisting of representatives from local disability organizations. The City **intends** to meet with the ADA Advisory Committee to introduce the ADA Self-Evaluation and Transition Plan process, seek feedback from the committee how the City is doing regarding accessibility, and to identify high priority areas within the City where programs, services, activities, or facilities that have barriers to access. Once the ADA Advisory Committee has been established, the City will continue to solicit feedback from the Committee and the public on the Transition Plan.

### 2.1 Web Survey

The City also developed a web survey open to the public. The survey was designed to help the City locate areas of greatest concern to the public and help provide better access to the community. The survey was made available via the following link, and feedback was documented between the start date (**start date**) and end date (**end date**):

[https://www.surveymonkey.com/r/ADA\\_Garland](https://www.surveymonkey.com/r/ADA_Garland)

### 2.2 Web Map

The City also developed an online map to allow the public to identify specific locations where they experience barriers related to accessibility, safety, connectivity, or suggestions for accessibility improvements that are needed in Garland. The map was made available via the following link, and feedback was documented between the start date (**start date**) and end date (**end date**):

<http://wikimapping.com/wikimap/Garland-ADA-Transition-Plan.html>

The web survey and map were posted on the City's web page and public participation was encouraged through **social media outreach**. These resources serve as a tool to solicit feedback from the public on the Transition Plan. The input received through the public access survey and web map are summarized in **Appendix A**.

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## **3.0 SELF-EVALUATION AND SUMMARY OF FINDINGS**

This update to the City of Garland's ADA Transition Plan includes the development of an inventory of the programs, services, and activities provided to employees and the public. The updated plan also includes the findings from facility evaluations of a subset of all City-owned/maintained buildings and associated parking lots, parks and associated parking lots, park sidewalk and associated curb ramps, signalized intersections, and public rights-of-way sidewalks and associated curb ramps.

### **3.1 Programs, Services, and Activities Review**

Under the ADA, the City of Garland is required to complete a Self-Evaluation of the City's facilities, programs, policies, and practices. The Self-Evaluation identifies and provides possible solutions to those policies and practices that are inconsistent with Title II requirements. To be compliant, the Self-Evaluation shall consider all the City's programs, services, and activities, as well as the policies and practices the City uses to implement its various programs and services.

To comply with requirements of the plan, the City shall take corrective measures to achieve program accessibility through several methods, including, but not limited to:

- (1) Relocation of programs to accessible facilities;
- (2) Modifications to existing programs so they are offered in an accessible manner;
- (3) Structural methods such as altering an existing facility;
- (4) Policy modifications to ensure nondiscrimination; and
- (5) Auxiliary aids needed to provide effective communication.

When choosing a method of providing program access, the City should attempt to give priority to the method that promotes inclusion among all users, including individuals with disabilities.

PSAs offered by the City to the public should be accessible. Accessibility applies to all aspects of a program, services, or activity, including advertisement, orientation, eligibility, participation, testing or evaluation, physical access, provision of auxiliary aids, transportation, policies, and communication.

However, the City does not have to take any action that will result in a fundamental alteration in the nature of a program or activity, create a hazardous condition for other people, or result in an undue financial and/or administrative burden. This determination should generally be made by the ADA/504 Coordinator and/or an authorized designee of the City, such as the City Manager or their designee, and shall be accompanied by a written statement detailing the reasons for reaching the determination. The determination of undue burden shall be based on an evaluation of all resources available for use. If a barrier removal action is judged unduly burdensome, the City shall consider all other options for providing access that will ensure that individuals with disabilities receive the benefits and services of the program or activity. This process shall be fully documented.





### **3.1.1 ADA/504 Coordinator (Title I / Title II)**

Under the ADA Title II, when a public entity has 50 or more employees based on an entity-wide employee total count, the entity is required to designate at least one (1) qualified responsible employee to coordinate compliance with ADA requirements. The name, office address, and telephone number of this individual shall be available and advertised to employees and the public. This allows for someone to assist with questions and concerns regarding disability discrimination to be easily identified.

The City of Garland has appointed Deborah Garza as ADA/504 Coordinator for Title I and Title II. Below is the ADA Coordinator's contact information.

Abel Aguirre, ADA/504 Coordinator  
Legal Compliance Specialist  
200 North Fifth Street  
Garland, TX 75040  
Office: 972-205-2375  
Texas Relay: 7-1-1  
[aaguirre@garlandtx.gov](mailto:aaguirre@garlandtx.gov)

The ADA/504 Coordinator contact information shall be provided to interested parties. The following distribution methods should be considered:

- Post on the City website;
- Prominently display in common areas that are accessible to all employees and areas open to the public;
- Provide in materials that are distributed by the City for meetings and events where requests for auxiliary aids or services for effective communication might be needed; and
- Provide in materials that are distributed by the City where ADA questions or concerns may arise.

The ADA Coordinator's information is available on the City's website here: <https://www.garlandtx.gov/4027/ADA-Information>.

### **3.1.2 Roles and Responsibilities of the ADA/504 Coordinator**

The responsibilities of the ADA/504 Coordinator include coordinating the City's efforts to comply with Title II and investigating any complaints related to potential violations of Title II. The role of the ADA Coordinator typically includes being the primary contact when members of the public request an auxiliary aid or service for effective communication, such as a sign language interpreter or documents in Braille. An effective ADA Coordinator will be able to efficiently assist people with disabilities with their questions. These roles and responsibilities are consistent with the Department of Justice's guidance for "An Effective ADA Coordinator" (<https://www.ada.gov/pcatoolkit/chap2toolkit.htm>).



### **3.1.3 ADA Grievance Policy, Procedure, and Form with Appeal Process for the ADA**

Local governments with 50 or more employees are required to adopt and publish procedures for resolving grievances in a prompt and fair manner that may arise under Title II of the ADA. The purpose of the ADA grievance procedure is to provide a mechanism for the resolution of discrimination issues at the City level, rather than require the complainant to resort to resolution at the federal level. ADA grievance policies and procedures were developed in December 2021.

The City of Garland Title II ADA Grievance Procedure and Form are provided in **Appendix B** and are also available on the City's website here: <https://www.garlandtx.gov/4029/ADA-Grievance-Procedure>

### **3.1.4 Public Notice Under the ADA**

The ADA public notice requirement applies to all state and local governments covered by Title II, including entities with fewer than 50 employees. The target audience for the public notice includes applicants, beneficiaries, and other people interested in the entity's PSAs. This notice is required to include information regarding Title II of the ADA and how it applies to the PSAs of the public entity. Publishing and publicizing the ADA notice is not a one-time requirement. State and local government entities shall provide the information on an ongoing basis, whenever necessary. The Department of Justice suggests including brief statements about:

- Employment;
- Effective communication;
- Making reasonable modifications to policies and programs;
- Not placing surcharges on modifications or auxiliary aids and services; and
- Filing complaints.

#### **Public Notice Under the ADA: Completed Actions**

A City of Garland Public Notice Under the ADA was developed in January 2022. A copy of the City's Public Notice Under the ADA is provided in **Appendix B** and is available on the City's website here: <https://www.garlandtx.gov/4030/Notice-under-ADA>. Publicizing the ADA notice is not a one-time requirement, and the City will provide the information on an ongoing basis, whenever necessary.

### **3.1.5 ADA Liaison Committee**

The ADA Liaison Committee is comprised of representatives from each City department. These individuals work closely with the ADA Coordinator to resolve issues regarding the needs of their department and the programs under their management. The ADA Coordinator works closely with the ADA Liaison Committee to coordinate the implementation of plans, programs, policies, and procedures. Each department representative is responsible for keeping a detailed log for all ADA inquiries within their department. This log will be shared with the ADA Coordinator and shall be retained for at least three (3) years.



## **3.2 Program, Services, and Activities Inventory**

The City of Garland has compiled a list of all City programs, services, and activities (PSAs) required to be reviewed for compliance with Title II of the ADA. The City will evaluate current status regarding ADA requirements including eligibility requirements, participation requirements, facilities used, staff training, tours, transportation, communication, notifications, public meetings, the use of contracted services, purchasing, maintenance of accessible features, and emergency procedures.

The Self-Evaluation of these PSAs will be completed over an estimated ten (10) year period and updates to the City's Transition Plan will be made to including findings and possible solutions for identified barriers. The following sections detail the identified PSAs for review.

Complete lists of the following are provided in **Appendix C**:

- Boards, Commissions, Committees, and Councils;
- Code of Ordinances;
- Communication Services;
- Departments;
- Documents;
- Employment Practices;
- Events, Programs, Services, and Activities;
- Forms and Checklists;
- Miscellaneous Ordinances;
- Standards; and
- Videos.

### Design Standards

The City of Garland has adopted the International Building Code. The City is not responsible for this code. The following City standards shall be evaluated for consistency with the 2010 ADA Standards for Accessible Design and 2011 PROWAG:

- City of Garland Engineering Design Manual

Detailed information from a complete review of the City's design standards is included in **Section 3.8**.

### Website

A review of the City's website for compliance with Section 508 of the Rehabilitation Act of 1973 and Web Content Accessibility Guidelines (WCAG) 2.0 AA will be completed as part of a future phase of the Transition Plan.

## **3.3 Existing Facility Inventory**

The first step in completing a Self-Evaluation Action Plan is understanding what facilities the City is responsible for maintaining and where each of these facilities is located. The existing facility inventory includes City-owned or maintained buildings, parks, signalized intersections, and sidewalk corridors. The City completed an existing facility inventory in 2021-2022 and the results are documented in the following sections. An overview map of the inventoried facilities is provided in **Appendix D**.



### **3.3.1 Buildings**

The City owns two hundred and thirty buildings, and forty-six of those buildings provide access to the public. All City-owned buildings with public access will be evaluated for compliance with the 2010 ADA Standards for Accessible Design and 2012 Texas Accessibility Standards, including parking lots, path of travel from the parking lot to the building, access into the building, signage, drinking fountains, telephones, bathrooms, and counter heights. Approximately 2.7 miles of on-site sidewalk and all associated curb ramps, ramps, stairs, and other paths of travel required to be ADA compliant will also be evaluated.

If a City of Garland employee requests an accommodation to be able to work at one of the buildings without public access, the City will evaluate the property at the time of the request.

A map of building facilities is provided in **Appendix D**.

### **3.3.2 Parks**

The City of Garland owns and maintains sixty-four public parks. All existing parks will be evaluated for compliance with the 2010 ADA Standards for Accessible Design and 2012 Texas Accessibility Standards, including parking lots, path of travel from the parking lot to the park amenities, access into facilities, signage, drinking fountains and restrooms. The City owns or maintains 2 pedestrian bridges within these parks.

A map of park facilities is provided in **Appendix D**.

### **3.3.3 Signalized Intersections**

All City-owned or maintained signalized intersections will be evaluated for compliance with PROWAG. Signalized intersection evaluations will document the conditions and measurements along the pedestrian path of travel, which includes street crossings, curb ramps, sidewalk adjacent to the curb ramps, and pedestrian signal equipment and adjacent clear spaces. Based on the inventory, the City maintains 215 signalized intersections which are shown on a map in **Appendix D**.

### **3.3.4 Sidewalk Corridors**

Using aerial imagery, the City developed a GIS-based inventory of City-maintained sidewalk corridors and cross street locations was developed in late 2021. Based on the inventory, the City of Garland maintains approximately 1,286 miles of sidewalk corridors, including pedestrian street and driveway crossings. There are approximately 5,535 unsignalized cross street intersections and approximately 3,361 driveways and alleys along the City-maintained sidewalk corridors.

All City-maintained pedestrian paths of travel will be evaluated for compliance with PROWAG based on the 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. At intersections where existing sidewalk does not cross the curb and curb ramps are not installed, no evaluations are needed. Locations where curb ramps are missing, but are required, will also be identified and included in the Transition Plan.

The ADA of 1990, Section 35.150, Existing Facilities, requires that the Transition Plan include a schedule for providing curb ramps or other sloped areas 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.”

A map of the sidewalk corridors to be evaluated is included in **Appendix D**.

### **3.3.5 Transit Stops**

All 804 stops within the City are owned and maintained by DART and are not the responsibility of the City of Garland.

### **3.3.6 Facility Inventory Summary**

Based on the completed inventory, the City has identified the following facilities for future evaluation:

- 46 buildings;
- 64 parks;
- 213 signalized intersections;
- 1,286 miles of sidewalk; and
- 5,535 unsignalized intersections and 3,361 driveways along the sidewalk corridors.

## **3.4 Self-Evaluation Action Plan**

The Federal Highway Administration (FHWA) has provided guidance on the ADA Transition Plan process in their “INFORMATION: ADA Transition Plans” memo dated June 27, 2019 (see **Appendix E**). While this memo specifically addresses state departments of transportations, FHWA also recommends this guidance for local municipalities until municipality-specific guidance is developed by FHWA. Provided in the memo is a checklist for elements to be included in an ADA Transition Plan and other ADA requirements that agencies should fulfill.

Items included in the FHWA checklist related to the public rights-of-way are:

- **Inventory of Barriers** (identification of physical obstacles)
  - Identify intersection information, including curb ramps and other associated accessibility elements.
  - Require an Action Plan to develop an inventory of sidewalks (slopes, obstructions, protruding objects, changes in level, etc.), signals (including accessible pedestrian signals), bus stops (bus pads), buildings, parking, rest areas (tourist areas, picnic areas, visitor centers, etc.), mixed use trails, linkages to transit.
  - Discuss jurisdictional issues/responsibilities for sidewalks.
- **Schedule**
  - Show a strong commitment toward upgrading ADA elements identified in the inventory of barriers in the short-term (planned capital improvement projects).
  - Show a strong commitment over time toward prioritizing curb ramps at walkways serving entities covered by the ADA.
  - Schedule shall include prioritization information, planning, and investments directed at eliminating other identified barriers over time.
  - Dedicate resources to eliminate identified ADA deficiencies.





- **Implementation Methods**

- Describe the methods that will be used to make the facilities accessible and include the governing standard (e.g., 2010 ADA Standards, 2011 PROWAG).

The City of Garland plans to evaluate all City-owned and/or maintained facilities for compliance with 2010 ADA Standards for Accessible Design and current version of PROWAG at the time of evaluation. The City's Action Plan to complete the evaluation of these facilities will be completed an estimated ten (10) year period and updates to the City's Transition Plan will be made to including findings and possible solutions for identified barriers. Facilities evaluated to date are included in **Section 3.7 Facilities Review**.

### **3.4.1 City of Garland Self-Evaluation Action Plan**

This City's Self-Evaluation Action Plan assigns an evaluation priority level to all inventoried facilities, which allows the City to prepare a schedule to complete the evaluations.

#### ***Phased Self-Evaluation Approach***

All facilities shall be evaluated as part of an agency's overall ADA Transition Plan. The City plans to phase the Self-Evaluation over the next several fiscal years.

Minimizing risk for pedestrians and risk for litigation are the City's goals when determining the order in which to evaluate facilities. The facility evaluation priority levels were determined based on the following factors:

- **Number of existing complaints** – Locations with complaints identified by the public as problem areas shall be evaluated as soon as possible to determine if the complaints are valid.
- **Proximity to pedestrian attractors** – Locations near pedestrian attractors (e.g., hospitals, retirement facilities, medical offices, parking garages, major employers, disability service providers, event facilities, bus or transit stop/routes, schools, government and public facilities, parks, libraries, and churches) are more likely to have a higher risk compared to those locations without pedestrian attractors.
- **Proximity to residential areas** – Locations near residential areas are more likely to have a higher risk than those locations adjacent to industrial areas where pedestrians are less likely to travel.
- **Number of crashes** – Locations with pedestrian-related crashes shall be evaluated to determine if there is a design reason for the crashes.
- **Age of facility** – Facilities constructed after July 26, 1991 are a higher risk than those constructed before the 1991 Standards for Accessible Design were published since they are not compliant with current standard.
- **Roadway functional classification** – Arterials typically have higher pedestrian activity than local roadways and may be a higher risk.
- **Pedestrian/vehicle volumes** – Higher pedestrian/vehicle volume roadways are more likely to have higher risk than lower volume pedestrian/vehicle roadways. Pedestrian volumes may be quantified using indicators such as number of pedestrian actuations at signalized intersections.



- **Existing sidewalks** – The ADA does not require sidewalks to be installed, but existing sidewalks shall be compliant and the accessible route shall be maintained in an accessible condition. Locations with existing sidewalks are a higher risk than locations without existing sidewalks.
- **Public input** – Receiving and taking into consideration feedback from the public to better understand their concerns is recommended. While formal complaints may not have been filed, areas of concern to the public are more likely to have a higher risk for litigation if an issue exists and the City does not respond and/or doesn't make any improvements.

Other factors to consider include:

- **Spatial distribution of facilities** – Selecting facilities to be evaluated evenly across different areas of the City or Council districts might be more well-received by the public, assuming all the risk factors above are equal.
- **Facility type** – Selecting a variety of different facilities to be evaluated during each phase, instead of all of the same facility type, may provide a better understanding of your high-risk areas. If the sidewalks evaluated are determined to be mostly compliant and the curb ramps evaluated are determined to be mostly non-compliant, the City may want to consider including a higher percentage of curb ramps during the next phase of evaluations.

**Upcoming Capital Improvement Projects (CIP)** – If curb ramps will be completely removed and replaced as part of an upcoming project, the ADA compliance of the new construction shall be confirmed during construction inspections and resources would be better spent evaluating curb ramps that are not planned for reconstruction.

The final step is to execute the Self-Evaluation Action Plan. The Action Plan may be modified as needed during and in between Self-Evaluation phases to account for lessons learned or budget changes.

### **3.5 Schedule and Implementation Methods**

It is acceptable for the City to phase the Self-Evaluation over several fiscal years; however, the DOJ and FHWA will not consider the initiative to be complete until all evaluations have been completed. The City shall determine and document in the Transition Plan the anticipated number of years required to complete the Self-Evaluation of City programs, services, activities, and facilities identified in **Section 3.2 Program, Services, and Activities Inventory** and **Section 3.3 Existing Facility Inventory**.

After the Self-Evaluation is complete, possible solutions have been identified, and cost estimates have been determined for each improvement, an implementation plan can be developed. Depending on the estimated cost of improvements, a typical implementation plan for an entity the size of the City of Garland can range from 10 to 30 years. The implementation plan needs to show both a strong commitment toward upgrading ADA elements identified in the inventory of barriers in the short-term (planned capital improvement projects) and a strong commitment over time toward prioritizing curb ramps at walkways serving entities covered by the ADA. The implementation plan should also include prioritization information, planning, and investments directed at eliminating other identified barriers over time.



## **3.6 Prioritization**

To aid in the development of the implementation plan, prioritization information has been provided for each facility with identified compliance barriers. **Table 2** provides the prioritization criteria for evaluated buildings and parks. **Table 3** provides the prioritization criteria for signalized and unsignalized intersection curb ramps. **Table 4** provides the prioritization schedule for the evaluated sidewalk corridors. All compliance elements included in the prioritization schedule are based on requirements from the 2010 ADA Standards for Accessible Design and 2011 PROWAG. While every effort will be made to design and implement improvements to be consistent with these standards, the City will provide access to the maximum extent feasible where full compliance is technically infeasible. Priorities were assigned based on DOJ priorities for facility access, previous project experience, and case law with respect to the severity of non-compliance. FHWA and DOJ have not provided any guidance on how to prioritize barriers, only that prioritization information should be included as part of the schedule; however, best practices suggest that the prioritization methodology and resulting thresholds be first based on the severity of non-compliance (i.e., safety concern) and then second based on the barrier's proximity to pedestrian attractors (e.g., adjacent to a hospital or governmental facility with high daily pedestrian traffic). Since raw data has been collected during the Self-Evaluation, all data needed for prioritization is contained in the database except for known complaints. Any complaints received by the City will be reviewed, and associated prioritization updates will be incorporated into the database.

Sidewalk corridors include the entire pedestrian path of travel, including sidewalk, cross streets, and driveways. When prioritizing a sidewalk corridor, priorities for the entire pedestrian path of travel should be reported together. However, for project design and costing purposes, the recommended improvements for cross streets are more appropriately reported with the rest of the intersection improvements.

It should also be noted that sidewalks are not required by the ADA, but if they are installed, sidewalks shall be compliant. Therefore, missing sidewalk segments with lengths of 200' or less are given a low priority.

To determine the priority for each facility, the raw data should be compared to the criteria in **Tables 2, 3, and 4**. To do this, start at Priority 1 and determine if any of the criteria apply. If yes, assign the facility a priority of 1. If no, move to Priority 2 and determine if any of the criteria apply. This process should be repeated until a priority has been assigned to all intersections and each sidewalk corridor segment.

### **3.6.1 Prioritization Factors for Facilities**

The date of construction for each building or park was used to determine which standard was used to evaluate current conditions, and observations described in the facilities review **Section 3.7.1 Buildings** and **3.7.2 Parks** include references to the associated standards. Buildings and parks were prioritized on a 12-point scale, which is defined in **Table 2**. This prioritization methodology was developed by the Consultant Team to aid the City in determining how the building or park should be prioritized for improvements based on the severity of non-compliance with ADA.

The 2011 PROWAG was used to evaluate the current conditions of signalized and unsignalized intersections, and sidewalk corridors.

Signalized and unsignalized intersections were prioritized on a 13-point scale, which is defined in **Table 3**. This prioritization methodology was developed by the Consultant Team to aid the City in determining which intersections should be prioritized for improvements over others based on the severity of non-compliance with the 2011 PROWAG.



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Sidewalk corridors were prioritized on a 3-point scale and were given a priority of either “High”, “Medium”, or “Low” based on the severity of non-compliance with 2011 PROWAG, which is defined in **Table 4**. Compliant segments of the sidewalk corridor were given a priority label of “Compliant”.

*[Remainder of page intentionally left blank]*



**Table 2. Prioritization Factors for Buildings/Parks**

Priority	Criteria
1 (high)	Complaint known or safety concern
2 (high)	<ul style="list-style-type: none"> <li>Element is more than twice the allowable requirement. No known complaint.</li> <li>AND (for exterior conditions) location is near a hospital, school, transit stop, government building, or other pedestrian attractor.</li> </ul>
3 (high)	<ul style="list-style-type: none"> <li>Element is more than twice the allowable requirement. No known complaint.</li> <li>AND (for exterior conditions) location is not near a hospital, school, transit stop, government building, or other pedestrian attractor.</li> </ul>
4 (high)	Barriers with parking or exterior conditions (DOJ level 1) – moderately not compliant with current standards
5 (medium)	Barriers with access to goods and services (DOJ level 2) – significantly not compliant with current standards
6 (medium)	Barriers with: <ul style="list-style-type: none"> <li>Access to goods and services (DOJ level 2) – moderately not compliant with current standards;</li> <li>Parking or exterior conditions (DOJ level 1) – minimally not compliant with current standards; OR</li> <li>Restrooms (DOJ level 3) – significantly not compliant with current standards</li> </ul>
7 (medium)	Barriers with: <ul style="list-style-type: none"> <li>Access to goods and services (DOJ level 2) – minimally not compliant with current standards;</li> <li>Restrooms (DOJ level 3) – moderately not compliant with current standards; OR</li> <li>Drinking fountains or public phones (DOJ level 4 &amp; 5) – significantly not compliant with current standards</li> </ul>
8 (medium)	Barriers with drinking fountains or public phones (DOJ level 4 & 5) - moderately not compliant with current standards
9 (low)	Barriers with restrooms (DOJ level 3) – minimally not compliant with current standards
10 (low)	Barriers with drinking fountains or public phones (DOJ level 4 & 5) - minimally not compliant with current standards
11 (low)	<ul style="list-style-type: none"> <li>Client is a Title II agency; AND</li> <li>Elements not compliant with current standards, but may be able to be handled programmatically or do not need to be handled unless or until the agency hires a person with a disability</li> </ul>
12 (low)	Element is fully compliant with an older standard (safe-harbored), but will need to be brought into compliance with current standards if altered





**Table 3. Prioritization Factors for Signalized and Unsignalized Intersections**

Priority	Criteria
<b>1 (high)</b>	Complaint filed on curb ramp or intersection
<b>2 (high)</b>	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> <li>• Running slope &gt; 12%</li> <li>• Cross slope &gt; 7%</li> <li>• Obstruction to or in the curb ramp or landing</li> <li>• Level change &gt; ¼ inch at the bottom of the curb ramp</li> <li>• No detectable warnings</li> </ul> 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.
<b>3 (high)</b>	<ul style="list-style-type: none"> <li>• No curb ramp where sidewalk or pedestrian path exists</li> </ul> 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.
<b>4 (high)</b>	No curb ramps, but striped crosswalk exists
<b>5 (medium)</b>	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> <li>• Running slope &gt; 12%</li> <li>• Cross slope &gt; 7%</li> <li>• Obstruction to or in the curb ramp or landing</li> <li>• Level change &gt; ¼ inch at the bottom of the curb ramp</li> <li>• No detectable warnings</li> </ul> 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.
<b>6 (medium)</b>	<ul style="list-style-type: none"> <li>• No curb ramp where sidewalk or pedestrian path exists</li> </ul> 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.
<b>7 (medium)</b>	Existing diagonal curb ramp (serving both crossing directions on the corner) is not compliant with current standards and shall be replaced with two curb ramps, one serving each crossing direction on the corner.
<b>8 (medium)</b>	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> <li>• Cross slope &gt; 5%</li> <li>• Width &lt; 36 inches</li> <li>• Median/island crossings that are inaccessible</li> </ul>
<b>9 (low)</b>	Existing curb ramp with either running slope between 8.3% and 11.9% or insufficient turning space
<b>10 (low)</b>	Existing diagonal curb ramp without a 48-inch extension into the crosswalk
<b>11 (low)</b>	Existing pedestrian push button is not accessible from the sidewalk and/or curb ramp
<b>12 (low)</b>	Existing curb ramp with returned curbs where pedestrian travel across the curb is not protected
<b>13 (low)</b>	All other intersections not prioritized above



**Table 4. 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% ≥ Value > 2.0%	
Width of sidewalk is less than 48 inches	Value ≤ 36.0"	36.0" < Value < 42.0"	42.0" < 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
Signalized cross street cross slope is greater than 5%	Value > 9.0%	9.0% ≥ Value ≥ 7.0%	7.0% > Value > 5.0%
Unsignalized cross street cross slope is greater than 2%	Value > 6.0%	6.0% ≥ Value ≥ 4.0%	4.0% > Value > 2.0%
Cross street running slope is greater than 5%	Value > 7.0%	7.0% ≥ Value ≥ 6.0%	6.0% > Value > 5.0%
Driveway sidewalk width is less than 48 inches	Value ≤ 36.0"	36.0" < Value < 42.0"	42.0" < Value < 48.0"
Driveway (or sidewalk if applicable) cross slope is greater than 2%	Value > 6.0%	6.0% ≥ Value ≥ 4.0%	4.0% > Value > 2.0%
Driveway (or sidewalk if applicable) condition is poor or is a safety concern	Elevation change greater than 1/2 inch or gaps greater than 1 inch	Elevation change between 1/4 inch and 1/2 inch or gaps between 1/2 inch and 1 inch	
Railroad crossing excessive sidewalk vertical discontinuity	Elevation change greater than 1/4 inch or gaps greater than 1 inch)		
Railroad crossing prefabricated plate is plastic or does not exist	Yes – Plastic or No		
Railroad crossing flangeway gap > 3 inches (freight) or flangeway gap > 2.5 inches (non-freight)	Value > 3.0" (freight) or 2.5" (non-freight)		
Railroad crossing is missing detectable warning surface(s)	No – Neither Side or Yes – 1 Side Only		



### 3.7 Facilities Review

#### 3.7.1 Buildings

Three buildings within the City of Garland were evaluated. All buildings included in the evaluation are listed in **Table 5** and shown on the map in **Appendix F**.

*Table 5. Summary of Buildings Reviewed*

Buildings	
1. Duckworth Utility Services Building	217 N 5 <sup>th</sup> St
2. Granville Performing Arts Center	300 N 5 <sup>th</sup> St
3. South Garland Branch Library	4845 Broadway Blvd

#### Buildings: Self-Evaluation Findings

Areas that were evaluated for each building included parking lots, path of travel from the parking lot to the building, access into the building, signage, drinking fountains, telephones, bathrooms, and counter heights. A complete list of barriers not compliant with the current standards is provided in the building facility reports (see **Appendix G**).

Common barriers identified included:

- Non-compliant exterior routes
- Non-compliant public transaction counters
- Non-compliant restrooms

#### Buildings: Possible Solutions

A complete list of possible solutions is provided in the building facility reports (see **Appendix G**).

#### 3.7.2 Parks

Three parks within the City of Garland were evaluated. All parks included in the evaluation are listed in **Table 6** and shown on the map in **Appendix F**.

*Table 6. Summary of Parks Reviewed*

Parks	
1. Auduban Park	342 W Oates Rd
2. Bradfield Park	1220 Castle Dr
3. James Park	1213 High Meadow Dr



### Parks: Self-Evaluation Findings

Areas that were evaluated for each park included parking lots, path of travel from the parking lot to the park amenities, access into facilities, signage, drinking fountains and restrooms. A complete list of barriers not compliant with the current standards is provided in the park facility reports (see **Appendix G**). Common barriers identified included:

- Non-compliant accessible parking
- Non-compliant pathway surfaces
- No accessible route to park amenities

### Parks: Possible Solutions

A complete list of possible solutions is provided in the park facility reports (see **Appendix G**).

## **3.7.3 Signalized Intersections**

Twelve (12) signalized intersections within the City of Garland were evaluated. Signalized intersection evaluations cataloged the conditions and measurements along the pedestrian path of travel, which includes street crossings, curb ramps, sidewalk adjacent to the curb ramps, and pedestrian signal equipment and adjacent clear spaces.

All signalized intersections included in the evaluation are listed on a map included in **Appendix F**.

### Signalized Intersections: Self-Evaluation Findings

Common curb ramp barriers not compliant with current standards included non-conforming detectable warning surfaces, no presence of detectable warning surfaces, excessive curb ramp turning space (landing) running slopes, and ponding at the base of the curb ramps or in curb ramp landings or flares. **Table 7** provides a summary of the curb ramp barriers not compliant with the current standards at signalized intersections.

Roughly two (2) percent of pedestrian crossings at signalized intersections did not have pedestrian signal heads or pedestrian push buttons. Pedestrian push buttons and signal heads were recommended to be installed at all signalized intersection pedestrian crossings where they did not exist. Common barriers associated with the existing pedestrian push buttons included push button signs inconsistent with the current *Texas Manual on Uniform Traffic Control Devices (TX MUTCD)* guidance, excessive push button clear cross slopes, and push buttons placed at locations inconsistent with the current *Texas Manual on Uniform Traffic Control Devices (TX MUTCD)* guidance. **Table 8** provides a summary of the push button barriers not compliant with the current standards.

### Signalized Intersections: Possible Solutions

A complete list of possible solutions can be found in the signalized intersection reports provided in **Appendix G**.



*Table 7. Summary of Curb Ramp Barriers at Signalized Intersections*

<b>Curb Ramp Element</b>	<b>Number Evaluated</b>	<b>Number Compliant</b>	<b>Percent Compliant</b>
Curb ramp present where curb ramp is needed	57	57	100.0%
Cut-thru ramp cross slope $\leq 2\%$	2	2	100.0%
Curb ramp lands in crosswalk	57	56	98.0%
Curb ramp does not have traversable sides	22	21	95.5%
Curb ramp counter slope $\leq 5\%$	57	53	93.0%
Curb ramp turning space (landing) exists	55	48	87.3%
Flush transition to roadway exists	57	47	82.5%
Curbed sides are $90^\circ$	22	18	81.8%
Curb ramp width $\geq 48''$	55	45	81.8%
Curb ramp running slope $\leq 8.3\%$	55	40	72.7%
Curb ramp turning space (landing) cross slope $\leq 2\%$	48	33	68.8%
48" crosswalk extension exists	36	24	67.0%
Flare cross slope $\leq 10\%$	35	23	65.7%
Curb ramp cross slope $\leq 2\%$	55	35	63.6%
No obstruction in curb ramp, turning space (landing), or flares	57	36	63.2%
No ponding in curb ramp, turning space (landing), or flares	57	33	57.9%
Curb ramp turning space (landing) running slope $\leq 2\%$	48	25	52.1%
Cut-thru ramp running slope $\leq 5\%$	2	1	50.0%
Detectable warning surface exists	57	27	47.4%
Detectable warning surface is compliant	27	10	37.0%
Cut-thru ramp width $\geq 60''$	2	0	0.0%





**Table 8. Summary of Push Button Barriers**

Push Button Element	Number Evaluated	Number Compliant	Percent Compliant
Pedestrian head present where needed	80	80	100.0%
Push button present where needed	84	82	98.0%
Pedestrian push button sign exists	84	81	96.4%
Push button orientation parallel to crossing	82	78	95.1%
Clear space is $\geq 30'' \times 48''$	58	55	94.8%
Push button height $\leq 48''$	82	70	85.4%
Push button offset from curb $\leq 10'$	82	69	84.1%
Push button diameter 2''	82	66	80.5%
Push button offset from crosswalk $\leq 5'$	82	64	78.0%
Push button reach range $> 10''$	82	58	70.7%
Clear space cross slope $\leq 2\%$	58	30	51.7%
Pedestrian push button sign is MUTCD approved	81	20	24.7%

Table 9 provides a summary of the prioritization classifications for evaluated signalized intersections.

**Table 9. Prioritization Summary for Evaluated Signalized Intersections**

Priority	Number of Intersections
0 (compliant)	0
1 (high)	0
2 (high)	8
3 (high)	0
4 (high)	0
5 (medium)	3
6 (medium)	0
7 (medium)	1
8 (medium)	0
9 (low)	0
10 (low)	0
11 (low)	0
12 (low)	0
13 (low)	0
<b>Total</b>	<b>12</b>



### **3.7.4 Sidewalk Corridors**

The sidewalk corridor evaluations documented conditions and measurements along the pedestrian path of travel, which includes the sidewalk, railroad crossings, curb ramps, pedestrian crossings at driveway openings, and pedestrian crossings at unsignalized intersections with cross streets. Approximately five miles of sidewalk were evaluated. The included sidewalk corridors were selected due to their high level of pedestrian activity as well as their proximity to pedestrian traffic generators. A map of the evaluated sidewalk corridors is provided in **Appendix F**.

#### Sidewalk Corridors: Self-Evaluation Findings

Common barriers not compliant with the current standards along the sidewalk corridors were excessive sidewalk cross slopes, vertical surface 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 Garland may find additional barriers with the sidewalk once the temporary obstruction is removed.

Common curb ramp barriers at unsignalized intersections along the sidewalk corridors included no presence of detectable warning surfaces, excessive curb ramp cross slopes, non-compliant detectable warning surfaces, and excessive curb ramp turn space (landing) running slopes. A summary of the unsignalized intersection curb ramp barriers not compliant with the current standards is provided in **Table 10**. 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.

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 Code of Federal Regulations (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."

#### Sidewalk Corridors: Possible Solutions

To meet the federal requirements for curb ramp installations, the following recommendations were made:

- Where sidewalk leads up to the curb at an intersection, both parallel and perpendicular to the project corridor, two (2) directional curb ramps were recommended to be installed where geometry permitted. 2011 PROWAG requires two (2) directional curb ramps be installed during modifications unless there are existing physical constraints.
- Where sidewalk parallel to the project corridor leads up to the curb at a driveway, directional curbs ramps were recommended to be installed to serve the driveway crossing.



- Where diagonal curb ramps were installed with the intent to serve a side-street crossing only, receiving curb ramps are still required to be installed on the opposite side of the major street. However, an engineering study should be performed prior to the installation of the receiving curb ramps to determine if the major street crossing is safe to accommodate. If the engineering study determines the major street crossing is unsafe to accommodate, the existing diagonal curb ramps should be removed and replaced with directional curb ramps in addition to the other requirements noted in **Section 1.7 Federal Highway Administration (FHWA) Guidance on Closing Pedestrian Crossings**.

The following possible solutions were made to improve pedestrian safety and are incorporated into the unsignalized intersection and driveway reports. These improvements are based on engineering judgement but are not required by federal accessibility standards.

- For all existing, unmarked pedestrian street crossings at unsignalized intersections, the installation of crosswalk markings is recommended. Pedestrian street crossings are defined by the curb ramp installation recommendations on the previous page. The 2009 MUTCD states that on approaches controlled by STOP or YIELD signs, crosswalk markings should be installed where engineering judgement dictates markings are needed to provide guidance for pedestrians who are crossing roadways by defining and delineating paths on approaches where traffic stops. Additionally, in conjunction with signs and other measures, crosswalk markings help to alert road users of a designated pedestrian crossing point across roadways at locations that are not controlled by traffic control signals or STOP or YIELD signs.
- For pedestrian crossings across commercial driveways, detectable warning surfaces are recommended to be installed on curb ramps or sidewalk approaches on either side of the driveway. 2011 PROWAG states that detectable warning surfaces should not be provided at crossings of residential driveways since the pedestrian right-of-way continues across residential driveway aprons. However, where commercial driveways are provided with yield or stop control, detectable warning surfaces should be provided at the junction between the pedestrian route and the vehicular route.

A complete list of possible solutions can be found in the sidewalk, unsignalized intersection, and railroad crossing facility reports provided in **Appendix G**.

*[Remainder of page intentionally left blank]*



*Table 10. Summary of Curb Ramp Barriers at Unsignalized Intersections*

Curb Ramp Element	Number Evaluated	Number Compliant	Percent Compliant
Curb ramp lands in crosswalk	79	79	100.0%
Cut-thru ramp running slope ≤ 5%	1	1	100.0%
Cut-thru ramp width ≥ 60"	1	1	100.0%
Curb ramp does not have traversable sides	39	38	97.4%
Curb ramp counter slope ≤ 5%	79	75	94.9%
Curb ramp turning space (landing) exists	78	71	91.0%
Curb ramp width ≥ 48"	78	69	88.5%
48" crosswalk extension exists	9	7	77.8%
Flush transition to roadway exists	79	60	75.9%
Curbed sides are 90°	39	25	64.1%
Curb ramp running slope ≤ 8.3%	78	50	64.1%
Curb ramp present where curb ramp is needed	132	79	60.0%
No ponding in curb ramp, turning space (landing), or flares	79	33	41.8%
No obstruction in curb ramp, turning space (landing), or flares	79	32	40.5%
Flare cross slope ≤ 10%	40	16	40.0%
Curb ramp turning space (landing) cross slope ≤ 2%	71	27	38.0%
Curb ramp turning space (landing) running slope ≤ 2%	71	27	38.0%
Detectable warning surface is compliant	16	6	37.5%
Curb ramp cross slope ≤ 2%	78	21	26.9%
Detectable warning surface exists	218	16	7.3%
Cut-thru ramp cross slope ≤ 2%	1	0	0.0%



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

**Table 11. Prioritization Summary for Evaluated Sidewalk Corridors**

Line type	Length (miles) by Priority				
	1 (high)	2 (medium)	3 (low)	Compliant	Total
Sidewalks	2.66	0.60	0.10	0.58	3.93
Driveways	0.32	0.28	0.12	0.14	0.86
Cross Streets	0.02	0.01	0.04	0.16	0.22
<b>Total</b>	<b>3.00</b>	<b>0.88</b>	<b>0.25</b>	<b>0.88</b>	<b>5.01</b>

**Table 12. Prioritization Summary for Evaluated Unsignalized Intersections**

Priority	Number of Intersections
0 (compliant)	0
1 (high)	0
2 (high)	16
3 (high)	8
4 (high)	0
5 (medium)	19
6 (medium)	8
7 (medium)	0
8 (medium)	1
9 (low)	2
10 (low)	0
11 (low)	0
12 (low)	0
13 (low)	57
<b>Total</b>	<b>111</b>

### 3.8 Design Standard Review

The City of Garland Engineering Design Manual was reviewed for compliance with the 2012 Texas Accessibility Standards, 2010 Standards for accessible Design, and 2011 PROWAG. A complete list of findings and possible solutions is provided in **Appendix H**.





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## 4.0 IMPLEMENTATION PLAN

### 4.1 Facilities Cost Projection Overview

To identify funding sources and develop a reasonable implementation schedule, cost projection summaries for only the facilities evaluated were developed for each facility type. To develop these summaries, recent bid tabulations from the Texas Department of Transportation (TxDOT) construction projects, along with Consultant Team 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%). All costs are in 2022 dollars. **Table 13** provides a summary of the estimated costs to bring each facility into compliance.

**Table 13. Summary of Facility Costs**

Facility Type	Priority			
	High	Medium	Low	Total*
Buildings	\$374,200	\$592,300	\$112,600	\$1,079,100
Parks	\$652,900	\$931,100	\$24,900	\$1,608,900
Signalized Intersections	\$473,200	\$283,900	\$0	\$757,100
Public Rights-of-Way Sidewalk	\$1,027,000	\$333,400	\$142,900	\$1,503,300
Public Rights-of-Way Unsignalized Intersections	\$299,700	\$333,300	\$140,200	\$773,200
<b>City Totals</b>	<b>\$2,827,000</b>	<b>\$2,474,000</b>	<b>\$420,600</b>	<b>\$5,721,600</b>

\*Table values are rounded for simplification

It is important to note that the facility cost estimates in **Table 13** only include the costs to remediate accessibility barriers not compliant with the current standards as determined by a visual inspection of the facilities. Additional budget considerations should be given to the following:

- Aesthetic upgrades, such as remodeling/upgrading of outdated facilities;
- Current market conditions that may affect pricing of construction materials and labor, such as COVID-19;
- Construction challenges not visible during inspection, such as underground or in-wall utilities; and
- Other factors that may affect costs.

It is recommended that a design professional assist the City in determining the best overall design solutions with respect to various factors, including but not limited to, existing conditions, available construction budget, and consideration for all elements that are non-compliant with current standard in a particular area of a facility.



## 4.2 Implementation Schedule

**Table 14** details the barrier removal costs and proposed implementation schedule by facility type for all City-owned facilities evaluated. Actual annual budgets will vary to accommodate project scopes. For example, all barriers at a single intersection are recommended to be removed within the same project scope. Because cost projections vary by intersection, the actual annual budget may vary to accommodate all improvements at an intersection. This 3-year plan will serve as the initial implementation schedule for the Transition Plan and includes improvements for the facilities evaluated to date. The City of Garland reserves the right to change the barrier removal priorities on an ongoing basis to allow flexibility in accommodating community requests, petitions 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 (CIP) to be addressed on a fiscal year basis. The City plans to apply a 3-year implementation schedule utilizing bond program funding, existing sidewalk maintenance programs, and capital project funding allocated specifically for accessibility improvements.

**Table 14. Implementation Schedule**

Facility Type	Estimated Cost	Implementation Schedule (years)	Approximate Annual Budget*
Buildings	\$1,079,100	3	\$359,700
Parks	\$1,608,900	3	\$536,300
Signalized Intersections	\$757,100	3	\$252,400
Public Rights-of-Way Sidewalk	\$1,503,300	3	\$501,100
Public Rights-of-Way Unsignalized Intersections	\$773,200	3	\$257,800
<b>City Total</b>	<b>\$5,721,600</b>		
<b>Total Annual Budget</b>			<b>\$1,907,300</b>

\*Table values are rounded for simplification

## 4.3 Funding Opportunities

Several alternative funding sources are available to the City to complete the improvements in this Transition Plan. The funding opportunities include applying for resources at the federal and state level, consideration of local options, and leveraging private resources. The following sections detail some different funding source options.

### 4.3.1 Federal and State Funding

There is federal and state funding available for the City to apply for through numerous agencies for various improvements. A summary of the available funding opportunities is provided on the FHWA website: [https://www.fhwa.dot.gov/environment/bicycle\\_pedestrian/funding/funding\\_opportunities.cfm](https://www.fhwa.dot.gov/environment/bicycle_pedestrian/funding/funding_opportunities.cfm).

Most of these programs are competitive type grants; therefore, the City of Garland is not guaranteed to receive these funds. It will be important for the City to track these programs to apply for the funds. Federal-aid funding programs have specific requirements that projects must meet, and eligibility must be determined on a case-by-case basis.



### **4.3.2 Local Funding**

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

- Community Development Block Grants (CDBG)
- 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.
- General fund (sales tax and bond issue)
- Scheduled/funded CIP projects that are funded through bonds
- Sidewalk or Access Improvement Fee
- Special tax districts – A district with the power to provide some governmental or quasi-governmental service and to raise revenue by taxation, special assessment, or charges for services.
- 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) is to be used for 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.
- 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.
- Transportation User Fee / Street Maintenance Fee

### **4.3.3 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 it by new development or redevelopment of an existing property.

*[Remainder of page intentionally left blank]*



## **4.4 Conclusion and Next Steps**

This document serves as the ADA Transition Plan Update for the City of Garland. In developing the Transition Plan, PSAs and facilities were inventoried, and a subset of facilities were reviewed for compliance with ADA guidelines. Detailed compliance reviews and project reports have been prepared for:

- 3 buildings;
- 3 parks;
- 12 signalized intersections; and
- 5 miles of sidewalk and all unsignalized intersections and driveways along the sidewalk corridors.

The possible solutions were prioritized, and an implementation plan was developed to provide guidance for the City's improvement projects in the coming years. Public outreach was also conducted to aid in the development of the plan. The City will continue to look for and remedy, barriers to access to ensure that Garland citizens who are disabled are given access to the City's PSAs.

To confirm follow-up on corrective actions required under the Transition Plan, the City will institute an ADA Action Log, documenting its efforts at compliance with the ADA. At a minimum, the Action Log will identify items that are not compliant with the current standards and will include anticipated completion dates. It is anticipated that the ADA action log and improvement implementation schedule will be updated on an annual basis. The ADA Action Log should be available upon request. See the ADA Action Log provided in **Appendix I**.

*[Remainder of page intentionally left blank]*





## **APPENDIX**

### **Appendix A: Public Outreach**

### **Appendix B: Grievance Procedure and Public Notice**

City of Garland Title II Grievance Procedure

City of Garland Title II Grievance Form

Public Notice Under the ADA

### **Appendix C: Programs, Services, and Activities Inventory**

Boards, Commissions, Committees, and Councils

Code of Ordinances

Communication Services

Departments

Documents

Employment Practices

Events, Programs, Services, and Activities

Miscellaneous Ordinances

Standards

Videos

### **Appendix D: Facility Inventory Map**

Facility Inventory Map

### **Appendix E: Federal Highway Administration ADA Transition Plans Memo**



**Appendix F: Evaluated Facility Maps**

Buildings

Parks

Signalized Intersections

Sidewalk Corridors

**Appendix G: Facility Reports**

Buildings

Parks

Signalized Intersections

Sidewalk Corridors

Unsignalized Intersections

**Appendix H: Design Standard Review**

**Appendix I: ADA Action Log**