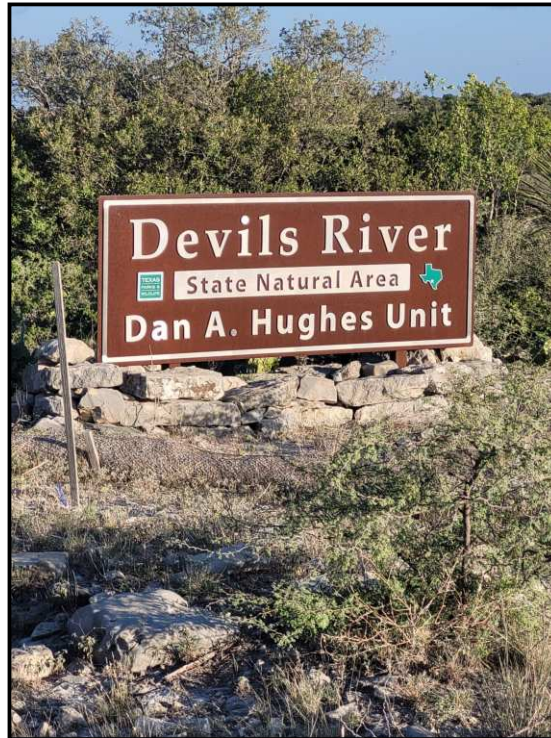


Access Audit Site Report



Devils River State Natural Area - Dan A. Hughes Un

21715 Dolan Creek Rd

Del Rio, TX 78840

Accessibility Evaluation

Inspection Date: 07/25/2022

Inspectors: Tanya Scheibe

Prepared By

WT Group

Engineering with Precision, Pace & Passion.

(224) 293 - 6451

www.wtengineering.com

Table of Contents

Cover Letter	3
DEVILS RIVER SNA - DAN A HUGHES PROGRAM REPORT 202301	5
Findings	13
Park Site	13
Administration Building	15

July 28, 2023

Jessica Burke, ADA Coordinator
Support Resources
Texas Parks and Wildlife Department
4200 Smith School Road
Austin, TX 78744

Dear Jessica,

Thank you for the opportunity to be of service to you by performing an accessibility evaluation for the Devils River State Natural Area - Dan A. Hughes Un located at 21715 Dolan Creek Rd, Del Rio, TX 78840. The facility was inspected on 07/25/2022.

We recommended that all barriers that are identified in this evaluation recommended in one of the phases below, be removed as soon as possible. A transition plan should be developed to assist in planning the removal of all barriers. To help with this, we have identified all barriers on a finding by finding basis with a phase identifier as follows:

1 (Phase 1): Should be completed immediately. This category includes findings that have little or no cost, were in violation of the codes at the time of construction, or pose an imminent safety threat.

2 (Phase 2): Should be completed as soon as possible. Includes findings that would remove barriers to the greatest number of people to your goods and services and findings new to the technical standards such as recreation elements

3 (Phase 3): Should be completed as soon as possible, but there may be other items that will provide greater access to persons with disabilities. This category includes findings that have a high financial impact on the entity, are subject to standards not yet final, or involve a partner entity.

4 (Option): Not necessary to complete, because other sites exist that meet Title II requirements for program access, or retrofit is technically infeasible, or variance is a construction tolerance.

5 (Smart Practice): Should be completed but not necessarily required. This category includes findings and or elements that were in compliance with previous editions of the codes and standards but have since changed. This category also includes techniques or elements that are not a part of the federal or state requirements, but are suggested in advisory language, or have been successfully implemented by other entities. Generally, these items are easily modified to provide the greatest degree of access as well as compliance with the most current codes and standards.

Periodic maintenance to ensure continued accessibility is essential in providing a safe and usable environment. Parking lot markings, signage, door opening pressures, and maintaining clear floor space at doors and other elements and fixtures, available to the public, must be part of an ongoing maintenance schedule.

If you have any questions regarding this report or would like to schedule a meeting with myself and your architect, attorney, or contractor, please feel free to contact me.

Legend of Abbreviations:

AFF... Above the finished floor
AGL... Above Ground Level
AR... Accessible Route
CIL... Change in Level
CFS... Clear Floor Space
EPC... Elevated Play Component
GLPC... Ground Level Play Component

Sincerely,



Tanya Scheibe, RAS #1369

**TEXAS PARKS AND WILDLIFE DEPARTMENT
DEVILS RIVER STATE NATURAL AREA - DAN A. HUGHES UNIT**

**AMERICANS WITH DISABILITIES ACT COMPLIANCE INITIATIVE
PROGRAM AND POLICY REPORT
JULY 28, 2023**

INTRODUCTION

The Texas Parks and Wildlife Department (TPWD) is subject to the many requirements of the Americans with Disabilities Act (ADA). To assist it in meeting those requirements, TPWD retained The WT Group, LLC (WTG) Accessibility Practice in 2021.

Title II of the ADA applies to TPWD sites, along with 89,000 other units of state and local government. WTG has a broad scope of work that matches the ADA requirements found in title II. It includes:

- Schedule and conduct project management meetings;
- Conduct access audits of 89 sites, including Devils River State Natural Area - Dan A. Hughes Unit;
- Prepare a site report that describes deficits at Devils River State Natural Area - Dan A. Hughes Unit, and suggests solutions to those deficits;
- Provide guidance regarding the programs or opportunities Texans can enjoy at Devils River State Natural Area - Dan A. Hughes Unit;
- Conduct community engagement events to determine the access preferences and priorities of Texans who visit Devils River State Natural Area - Dan A. Hughes Unit;
- Provide a Devils River State Natural Area - Dan A. Hughes Unit Transition Plan that identifies deficits, notes solutions, identifies the officer responsible for barrier removal, and notes the phase or timing of barrier removal;
- Provide a GIS shapefile regarding the accessibility of Devils River State Natural Area - Dan A. Hughes Unit;
- Provide a method of tracking barrier removal at Devils River State Natural Area - Dan A. Hughes Unit; and
- Report to TPWD leadership and stakeholders.



THIS REPORT

This report addresses program and policy advice, and then the WTG observations of deficits at Devils River State Natural Area - Dan A. Hughes Unit. Other deliverables are provided under separate cover.

What is a Program?

A unit of state or local government is required to make the “programs” it offers accessible to people with and without disabilities. The term “program” is broadly defined as an opportunity made available by the state to the public, and the term public includes both people with and without disabilities. As an example, if a state park offers camping it must make certain that some campsites are of an accessible design.

The number to be made accessible is called scoping and it is usually a percentage or ratio of the similar sites. For example, if a state park has outdoor constructed features such as grills, fire pits, and benches, it must make 20% of an accessible design. Those 20% accessible must be dispersed throughout the park.

In an ADA context, “programs” at a state park or state natural area include but are not limited to:

Hiking	Fishing
Camping	Bird Watching
Swimming	Playgrounds
Lodging	Beaches
Boating	Interpretive activities
Parking	Visitor Centers
Trams	Picnicking
Sports fields	Viewing areas
Restrooms	Grilling

The Federal and Texas Accessibility Standards

The current Texas Accessibility Standards (TAS 2012) became effective in 2012 after an amendment process. Those Standards are almost identical to the federal 2010 Standards for Accessible Design, and both effectively address parking, entries, restrooms, and other typical building elements. They also address playgrounds, boating and fishing areas, and sports fields and courts. They do not however address some of the assets at Devils River State Natural Area - Dan A. Hughes Unit. Trails, campsites, and picnic areas are not yet a final and enforceable state or federal standard.

That will change at the end of 2023 or early 2024. The Texas Department of Licensing and Regulation (TDLR) has signaled its intent to adopt the pending federal guidance for key outdoor assets integral to TPWD sites like Devils River State Natural Area - Dan A. Hughes Unit. This includes trails, beaches, campsites, picnic areas, viewing areas, and constructed park assets like grills, fire pits, and benches.

In discussing the Standards, it is important to use the correct definition of park assets. Most definitions are found in TAS 2012 at section 106. As noted above, TDLR plans to add the pending federal guidance regarding some outdoor areas to TAS. It is important to remember



that the Standards set the floor, not the ceiling. Making a slope more gentle, or a route wider, is always a smart practice with universal design benefits.

Some selected definitions of park assets common to TPWD are noted below.

- **Trail:** A pedestrian route developed primarily for outdoor recreational purposes. A pedestrian route developed primarily to connect elements, spaces, or facilities within a site is not a trail.
- **Trailhead:** An outdoor space that is designed by an entity responsible for administering or maintaining a trail to serve as an access point to the trail. The junction of two or more trails or the undeveloped junction of a trail and a road is not a trailhead.
- **Picnic Facility:** A site or portion of a site developed for outdoor recreational purposes that contains picnic units.
- **Picnic Unit:** An outdoor space in a picnic facility used for picnicking that contains outdoor constructed features.
- **Outdoor Constructed Features:** Picnic tables, fire rings, grills, fireplaces, wood stoves, trash and recycling receptacles, water hydrants, utility and sewage hookups, outdoor rinsing showers, benches, and viewing scopes provided at outdoor recreation facilities.
- **Camp Shelter:** A partially enclosed structure that provides campers and hikers cover from weather and that does not contain plumbing fixtures or kitchen appliances. Camp shelters are not transient lodging facilities or residential dwelling units.
- **Camping Facility:** A site or portion of a site developed for outdoor recreational purposes that contains camping units.
- **Camping Unit:** An outdoor space in a camping facility used for camping that contains outdoor constructed features, parking spaces for recreational vehicles, tent pads or tent platforms, or camp shelters.
- **Viewing Area:** An outdoor space developed for viewing landscapes, wildlife, or other points of interest.
- **Boarding Pier:** A portion of a pier where a boat is temporarily secured for the purpose of embarking or disembarking.
- **Boat Launch Ramp:** A sloped surface designed for launching and retrieving trailered boats and other watercraft to and from a body of water.
- **Gangway:** A variable-sloped pedestrian walkway that links a fixed structure or land with a floating structure. Gangways that connect to vessels are not addressed by these Standards.
- **Transition Plate:** A sloping pedestrian walking surface located at the end(s) of a gangway.



- **Play Area:** A portion of a site containing play components designed and constructed for children.
- **Play Component:** An element intended to generate specific opportunities for play, socialization, or learning. Play components are manufactured or natural; and are stand-alone or part of a composite play structure.

Two other key outdoor assets are not included in the definitions. Both are defined below.

- **Beach access routes:** A beach access route (BAR) connects an entry point to the beach to the water, as defined below:
 - At a tidal beach, to the high tide level
 - At a river beach, to the mean high water level
 - At a lake, pond, or reservoir beach, to the normal recreation water level

A BAR can be temporarily placed at a beach for all hours the beach is open, and need not be a permanent fixture.

- **Outdoor Recreation Access Routes (ORAR):** A route that connects outdoor recreation assets at an outdoor recreation site. An ORAR is not a trail.

Conditions for Exceptions at Certain Outdoor Recreation Assets

In developing the scoping and technical requirements for accessibility at beaches, trails, and other outdoor developed areas, a wide net was cast to assure a variety of perspectives. The process involved:

- Officials from states with beaches and trails
- Officials from local entities with beaches and trails
- People with disabilities
- Landscape architects and civil engineers
- Parks and recreation officials

Throughout the process, all agreed that there are times that an existing beach, a new beach, an existing trail, or a new trail cannot meet the technical requirements for accessibility. The belief of regulatory bodies however is that these conditions should arise infrequently. The four conditions for exception are defined and discussed below.

- Section 1019.1.1: ***Compliance is not practicable due to terrain.***

This is best clarified as naturally occurring terrain. It is applicable to both existing trails, and new trails. When locating and designing new trails, making the trail accessible should be a very high priority.

- Section 1019.1.2: ***Compliance cannot be accomplished with the prevailing construction practices.***

This is best clarified as a reference to prohibitions on the use of foreign soil or motorized equipment. As an example, if a trail bed is being carved by TPWD staff and volunteers



on their hands and knees, with pick axes, shovels, and hoes, all because of a prohibition on motorized equipment in the park, this exception may apply

- Section 1019.1.3: ***Compliance would fundamentally alter the function or purpose of the facility or the setting.***

This is best clarified as having a clear understanding of the purpose of the asset. A sharply ascending trail in a mountainous West Texas state park may have the intended use of endurance training. To “flatten” the trail is possible from a design perspective, but the trail then loses its function or purpose.

- Section 1019.1.4: ***Compliance is limited or precluded by any of the following laws, or by decisions or opinions issued or agreements executed pursuant to any of the following laws:***

Endangered Species Act (16 USC 1531 et seq.);

National Environmental Policy Act (42 USC 4321 et seq.);

National Historic Preservation Act (16 USC 470 et seq.);

Wilderness Act (16 USC 1131 et seq.); or

Other federal, State of Texas, or local laws the purpose of which is to preserve threatened or endangered species; the environment; or archeological, cultural, historical, or other significant natural features.

There are other mitigating factors regarding accessibility. Four are discussed below.

- Construction Tolerance (see 104.1.1 Construction and Manufacturing Tolerances): All dimensions are subject to conventional industry tolerances except where the requirement is stated as a range with specific minimum and maximum end points. This is likely most applicable in new construction, but may also apply to making transition plan retrofits.
- Equivalent Facilitation (see 103 Equivalent Facilitation): Nothing in these requirements prevents the use of designs, products, or technologies as alternatives to those prescribed, provided they result in substantially equivalent or greater accessibility and usability. This is likely most applicable in new construction, but may also apply to making transition plan retrofits.
- Technical Infeasibility (see 106 Definitions): With respect to an alteration of a building or a facility, a condition wherein compliance with a requirement of this Standard has little likelihood of accomplishment because existing structural conditions would require removing or altering a load-bearing member that is an essential part of the structural frame; or because other existing physical or site constraints prohibit modification or addition of elements, spaces, or features that are in full and strict compliance with the minimum requirements. This is likely most applicable to making transition plan retrofits.
- Safe Harbor (see US DOJ title II section 35.151(c)): If a public entity has constructed or altered required elements of a path of travel in accordance with the specifications in either the 1991 Standards or the Uniform Federal Accessibility Standards, or TAS 1994,



before March 15, 2012, the public entity is not required to retrofit such elements to reflect incremental changes in the 2010 Standards solely because of an alteration to a primary function area served by that path of travel. ***It is important to note that the 1991 Standards and TAS 1994 did not address technical requirements for recreation assets, such as boating areas, fishing areas, beaches, campsites, trails, picnic areas, playgrounds, sports fields, sports courts, and more. The Safe Harbor approach cannot be applied to such assets.***

Campsites

We have sorted campsites into several categories. These include tent only campsites, recreational vehicle campsites, shelter sites, and sites that combine features in a hybrid approach, such as an RV site with utilities.

In evaluating Devils River State Natural Area - Dan A. Hughes Unit, WTG used TAS 2012, the pending outdoor developed areas guidance, and smart practices that make public spaces and outdoor recreation assets more accessible to people with disabilities. We also applied the concepts of construction tolerance, technical infeasibility, safe harbor, equivalent facilitation, and other imitations on when a site must be made accessible.

What is Inclusion?

The title II regulation requires Devils River State Natural Area - Dan A. Hughes Unit programs to be available in the most integrated setting. This is defined as the setting in which people with and without disabilities interact together. Using the camping example above, inclusive camping would locate accessible campsites amidst inaccessible campsites to facilitate interaction between campers with and without disabilities.

While all programs must be inclusive, that does not mean that everyone with every type of disability or health condition must be allowed to participate in every program. The concept of essential eligibility allows Devils River State Natural Area - Dan A. Hughes Unit to apply neutral conditions to determine who uses programs. Again, using camping, if there are 20 campsites and a person with a disability is the 21st person to register, the neutral concept of “capacity” applies and that camper has no place to camp. If that camper is the 20th person to seek camping but does not pay the campsite fee, the neutral concept of paying the same fees can apply and that camper will not camp at Devils River State Natural Area - Dan A. Hughes Unit.

How Can Programs in General Be Made Accessible?

The title II regulation at section 35.150(b) lists a number of ways to make Devils River State Natural Area - Dan A. Hughes Unit programs accessible. These include but are not limited to:

- Removing architectural barriers;
- Removing communication barriers;
- Changing rules and policies;
- Providing additional staff training;



- Providing different staff ratios;
- Providing adaptive equipment;
- Providing auxiliary aids and services such as a sign language interpreter;
- Providing accessible transportation when transportation is part of the opportunity;
- Reassignment of services to accessible locations;
- Conducting duplicate opportunities, one in accessible location and the other in an inaccessible location;
- Designing and constructing new facilities that are therefore fully compliant;
- Home visits; and
- Other methods that make programs accessible.

Devils River State Natural Area - Dan A. Hughes Unit staff should be aware of, and ready to, provide such modifications.

Are the Devils River State Natural Area - Dan A. Hughes Unit Programs Accessible and Inclusive?

In our review of the opportunities available at Devils River State Natural Area - Dan A. Hughes Unit, we saw:

- One boating area; and
- One primitive tent campsite.

Of these, the accessibility status and our recommendation is:

- Make the boating area accessible; and
- Make the primitive tent campsite accessible.

Camping Clarification

A number of campsites of each type provided within the park (see the Outdoor Developed Area Guidelines at 244.2, which will eventually be a part of the revisions to TAS 2012) must be retrofit to make the program of camping accessible, and to meet the soon-to-be-adopted State of Texas standard.

We have sorted campsites into three types: tent only, hybrid (usable by tent or RV), and group. TPWD or Devils River State Natural Area - Dan A. Hughes Unit staff can also distinguish these sites by amenities provided (covered tables, water only, electric, scenic views, etc.).








If concessionaires are to provide camping experiences at the Park, those sites too must include accessible campsites.

Conclusion



The staff at Devils River State Natural Area - Dan A. Hughes Unit offer experiences and assets desired by park visitors. Those same experiences and assets must be accessible to and usable by people with disabilities. See the following site report to identify barriers and recommendations for barrier removal.

Devils River State Natural Area - Dan A. Hughes Un - 21715 Dolan Creek Rd Del Rio, TX 78840



Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
1	Park Site: River Access	[29.71695, -101.0217]	The surface of the clear ground space shall be firm and stable The slope of the clear ground space surface shall not be steeper than 1:48 in any direction. EXCEPTION: Where the surface is other than asphalt, concrete, or boards, slopes not steeper than 1:20 shall be permitted when necessary for drainage	Lacks clear ground space (CGS) at river map sign	Correct surface at river map sign to firm, stable and having max slope of 2.08% or 5% if other than concrete asphalt or boards as a smart practice.	2015 ABAAS Section: 1011.2.2, 1011.2.3, 1011.2 EXCEPTION		
2	Park Site: River Access	[29.717, -101.0216]	At least one accessible route shall connect accessible buildings, accessible facilities, accessible elements, and accessible spaces that are on the same site. For areas of sport activity, an accessible route is required to connect to the boundary of each area of sport activity. The size of an area of sport activity includes only the space needed to play. Where multiple sports fields or courts are provided, an accessible route is required to each field or area of sport activity.	Lacks route (AR) to river access	Provide an accessible route (AR) to each element within the site.	2010 ADAS Section: 206.2.2, 206.2		
3	Park Site: Paddler Campsite	[29.71696, -101.0215]	Camping facilities shall provide camping units with mobility features complying with F244.2 in accordance with Table F244.2. Where a camping facility provides different types of camping units, Table F244.2 shall apply to each type of camping unit provided. Total Number of Camping Units Provided in Camping Facility Minimum Number of Camping Units with Mobility Features Required 1 1 2 to 25 2 26 to 50 3 51 to 75 4 76 to 100 5 101 to 150 7 151 to 200 8 201 and over 8, plus 2 percent of the number over 200	Mile Marker 29 paddlers camp - primitive campsites along river lack accessible features	Create the required number of accessible camp sites per table F244.2 as a smart practice.	2015 ABAAS Section: F244.2		

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
4	Park Site: Paddler Campsite	[29.7172027 , -101.0204 517]	50% of the single accommodation restrooms provided in this grouping are not nearly compliant. The restrooms do not have the required minimum clear floor space or maneuvering clearances for the toilet, The restrooms do not have the required minimum clear floor space or maneuvering clearances for the lavatory, The entry doors do not contain the required minimum maneuvering spaces on the pull/push sides, The entry doors encroach into the required clear floor space for fixtures, Grab bars are missing and/or incorrectly installed, Accessories, such as toilet seat covers, paper towel holders, garbage cans, hand dryers, and mirrors are either too high or without clear floor space or both, The restrooms contain floor level changes greater than a 1/2 inch, the showers are too small and missing numerous accessible elements.	Restroom building at paddler camp 29 - locked, unable to audit (signs have symbol of accessibility, no AR, likely no sink, have grab bars)	Ensure that all restroom amenities in at least one restroom are fully accessible.	2015 ABAAS Section: 603.1 2012 TAS Section: 603.1 2010 ADAS Section: 603.1		



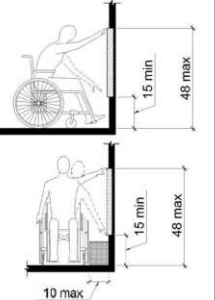

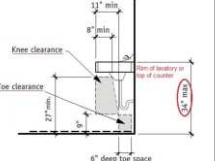
Devils River State Natural Area - Dan A. Hughes Un - 21715 Dolan Creek Rd Del Rio, TX 78840

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
5	Administration Building: Admin - Parking	[29.73748, -100.9635]	The surfaces of the accessible parking spaces and access aisles are not firm, stable, and slip resistant. Floor and ground surfaces shall be stable, firm, and slip resistant. Parking spaces and access aisles serving them shall comply with 302. Access aisles shall be at the same level as the parking spaces they serve. Changes in level are not permitted.	Gravel parking area (approximately room for 10 total spaces), gravel to all buildings except lodging	Create one or more 8' accessible parking stalls, with one 8' adjacent access aisle, with proper signage and striping on a firm and stable surface.	2015 ABAAS Section: 502.4, 302.1 2012 TAS Section: 502.4, 302.1 2010 ADAS Section: 502.4, 302.1		
6	Administration Building: Admin - Public Spaces	[29.7375, -100.9635]	Minimum maneuvering clearances at doors and gates shall comply with 404.2.4. Maneuvering clearances shall extend the full width of the doorway and the required latch side or hinge side clearance. Maneuvering clearances shall have a max slope of 2.08%. Door openings shall provide a clear width of 32 inches (815 mm) minimum. Clear openings of doorways with swinging doors shall be measured between the face of the door and the stop, with the door open 90 degrees. Openings more than 24 inches (610 mm) deep shall provide a clear opening of 36 inches (915 mm) minimum. There shall be no projections into the required clear opening width lower than 34 inches (865 mm) above the finish floor or ground. Projections into the clear opening width between 34 inches (865 mm) and 80 inches (2030 mm) above the finish floor or ground shall not exceed 4 inches (100 mm). The threshold at a doorway shall be no higher than 1/2 inch. Changes in level between 1/4 inch and 1/2 inch must be beveled at 1:2 or less. 1/4 inch is the maximum vertical rise.	Volunteer/staff lodging door - bed in pull side clearance, 29.5" wide, ramp up to door, large threshold	For all doors along the public circulation route, provide required maneuvering clearance on push and pull side of doors. For all doors along the public circulation route, replace doors with doors having 80" overhead clearance and 32" clear width. For all doors along the public circulation route, provide beveled threshold.	2010 ADAS Section: 404.2.3, 404.2.7, 404.2.4, 404.2.11, 404.2.11 Exception		

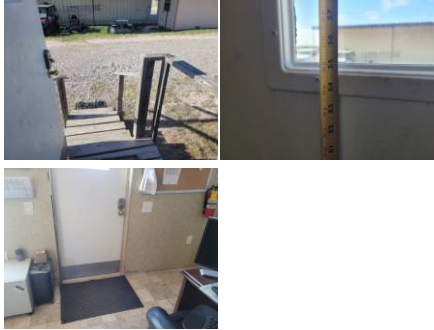

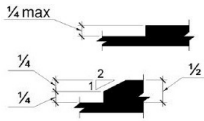
Devils River State Natural Area - Dan A. Hughes Un - 21715 Dolan Creek Rd Del Rio, TX 78840

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
7	Administration Building: Admin - Public Spaces	[29.7374, -100.9636]	Areas used by volunteers must be fully compliant. Single beds must provide CFS on both sides of the bed. Toilet and bathing rooms must comply with all requirements for each fixture and accessory provided. Refrigerators must have CFS parallel to the appliance doors. At least one work surface must be max 34" aff and provide knee and toe clearance.	small lodging space for volunteers or staff, includes bed, fridge, toilet	Provide compliant lodging space for staff and volunteers including access to an accessible restroom, bedroom, and kitchenette.	Capture Section: 1		
8	Administration Building: Admin - Employee Spaces	[29.71711, -101.0212]	There are additional buildings on the property that are not currently used by public or employees.	other houses on property currently in use, did not assess these buildings	If existing buildings are reopened for public use, make corrections to ensure that the public spaces are accessible.	Capture Section: 1		
9	Administration Building: Admin - Employee Spaces	[29.7374767, -100.9635003]	Minimum maneuvering clearances at doors and gates shall comply with 404.2.4. Maneuvering clearances shall extend the full width of the doorway and the required latch side or hinge side clearance. Maneuvering clearances shall have a max slope of 2.08%. Doors, gates, and side lights adjacent to doors or gates, containing one or more glazing panels that permit viewing through the panels shall have the bottom of at least one glazed panel located 43 inches (1090 mm) maximum above the finish floor. EXCEPTION: Vision lights with the lowest part more than 66 inches (1675 mm) from the finish floor or ground shall not be required to comply with 404.2.11.	End door - vision window at 55" above the finished floor (AFF), stairs in pull side clearance	For all doors along the public circulation route, provide required maneuvering clearance on push and pull side of doors. For all doors along the public circulation route, replace doors with ones having sidelight viewing windows max 43" AFF.	2010 ADAS Section: 404.2.3, 404.2.7, 404.2.4, 404.2.11, 404.2.11 Exception		


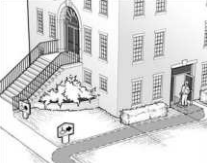
Devils River State Natural Area - Dan A. Hughes Un - 21715 Dolan Creek Rd Del Rio, TX 78840

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
10	Administration Building: Admin - Employee Spaces	[29.7374953, -100.9633501]	Spaces and elements within employee work areas shall only be required to comply with 206.2.8, 207.1, and 215.3 and shall be designed and constructed so that individuals with disabilities can approach, enter, and exit the employee work area. Employee work areas, or portions of employee work areas, other than raised courtroom stations, that are less than 300 square feet (28 m2) and elevated 7 inches (180 mm) or more above the finish floor or ground where the elevation is essential to the function of the space shall not be required to comply with these requirements or to be on an accessible route.	Offices - wall in pull side clearance to end office	For employee spaces, relocate storage, furniture, and other obstacles at doorways to provide approach, enter and exit at the employee space. Provide required maneuvering clearance on push and pull side of doors.	2015 ABAAS Section: F203.9 2012 TAS Section: 203.9 2010 ADAS Section: 203.9		
11	Administration Building: Admin - Employee Spaces	[29.7374767, -100.9634359]	The operable part is positioned too high for either a side or front approach. Where a clear floor or ground space allows a parallel approach to an element and the side reach is unobstructed, the high side reach shall be 48 inches maximum and the low side reach shall be 15 inches minimum above the finish floor or ground. Where a forward reach is unobstructed, the high forward reach shall be 48 inches maximum and the low forward reach shall be 15 inches minimum above the finish floor or ground.	Range hood high - 64.5" above the finished floor (AFF), hooks at 58" AFF	Remount operable parts to be in reach range of 15" min to 48" max.	2015 ABAAS Section: 308.1 2012 TAS Section: 308.1 2010 ADAS Section: 308.1		
12	Administration Building: Admin - Employee Spaces	[29.7373835, -100.9635218]	The top rim of the sink is too high. All lavatories/sinks that are designated to be accessible shall be a minimum 17 inches in horizontal depth and mounted with the rim or counter edge no higher than 34 inches above the finished floor.	Rim of sink at 36.25" above the finished floor (AFF)	Lower sinks to max 34" above the finished floor (AFF) to front of rim.	2015 ABAAS Section: 606.3 2012 TAS Section: 606.3 2010 ADAS Section: 606.3		



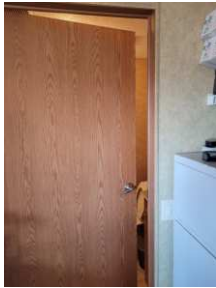
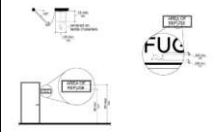

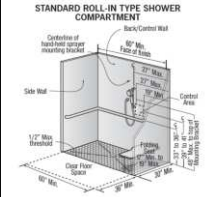
Devils River State Natural Area - Dan A. Hughes Un - 21715 Dolan Creek Rd Del Rio, TX 78840

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
13	Administration Building: Admin - Employee Spaces	[29.73762, -100.9635]	Minimum maneuvering clearances at doors and gates shall comply with 404.2.4. Maneuvering clearances shall extend the full width of the doorway and the required latch side or hinge side clearance. Maneuvering clearances shall have a max slope of 2.08%. Hand-activated door opening hardware, handles, pulls, latches, locks, and other operating devices on accessible doors shall have a shape that is easy to grasp with one hand and does not require tight grasping, tight pinching or twisting of the wrist to operate. Hardware shall be 34 inches minimum and 48 inches maximum above the finish floor or ground. Doors, gates, and side lights adjacent to doors or gates, containing one or more glazing panels that permit viewing through the panels shall have the bottom of at least one glazed panel located 43 inches (1090 mm) maximum above the finish floor. EXCEPTION: Vision lights with the lowest part more than 66 inches (1675 mm) from the finish floor or ground shall not be required to comply with 404.2.11.	Center door - stairs in pull side clearance, knob, vision window at 55" above the finished floor (AFF)	For all doors along the public circulation route, provide required maneuvering clearance on push and pull side of doors. For all doors along the public circulation route, replace hardware with lever hardware or hardware operable without a tight pinch or grasp. For all doors along the public circulation route, replace hardware with lever hardware or hardware operable without a tight pinch or grasp and having a max profile of 4". For all doors along the public circulation route, replace doors with ones having sidelight viewing windows max 43" AFF.	2010 ADAS Section: 404.2.3, 404.2.7, 404.2.4, 404.2.11, 404.2.11 Exception		
14	Administration Building: Admin - Employee Spaces	[29.73582, -100.9583]	The walkway contains abrupt vertical edges and/or variations over a 1/4 inch. 1/4 inch is the maximum vertical rise. Changes in level between 1/4 inch and 1/2 inch must be beveled at 1:2 or less. Changes in level greater than 1/2 inch must be by way of a ramp.	Gravel drive, step up into maintenance barn	Repair, bevel or ramp CIL along AR. Connect an AR from an accessible parking stall to the maintenance building entry.	2012 TAS Section: 303.2, 303.3 2010 ADAS Section: 303.2, 303.3		

Devils River State Natural Area - Dan A. Hughes Un - 21715 Dolan Creek Rd Del Rio, TX 78840

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
15	Administration Building: Admin - Employee Spaces	[29.7354237, -100.9584012]	The building entrance is not located on an accessible route. When a building, or portion of a building, is required to be accessible, an accessible route of travel shall be provided to all portions of the building, to accessible building entrances and between the building and the public way. All walks, halls, corridors, aisles, skywalks, tunnels, and other spaces that are part of an accessible route must comply. An accessible route of travel must not pass through kitchens, storage rooms, restrooms, closets or other spaces used for similar purposes. At least one accessible route within the boundary of the site must be provided from public transportation stops, accessible parking and accessible passenger loading zones and public streets or sidewalks to the accessible building entrance they serve. The accessible route shall, to the maximum extent feasible, coincide with the route for the general public. At least one accessible route shall connect accessible buildings, facilities, elements and spaces that are on the same site. At least one accessible route shall connect accessible building or facility entrances with all accessible spaces and elements.	gravel drive and parking, no AR to house	Provide accessible parking surface and create AR to entrance of employee residence.	2015 ABAAS Section: F206.2.1 2012 TAS Section: 206.2.1 2010 ADAS Section: 206.2.1		

Devils River State Natural Area - Dan A. Hughes Un - 21715 Dolan Creek Rd Del Rio, TX 78840

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
16	Administration Building: Admin - Restrooms	[29.7376071, -100.9634359]	The restroom is not compliant. The restroom does not have the required minimum clear floor space or maneuvering clearances for the toilet. The restroom does not have the required minimum clear floor space or maneuvering clearances for the lavatory. The entry door does not contain the required minimum maneuvering spaces on the pull/push sides. The entry door encroach into the required clear floor space for fixtures. Grab bars are missing and/or incorrectly installed. Accessories, such as toilet seat covers, paper towel holders, garbage cans, hand dryers, and mirrors are either too high or without clear floor space or both.	Lacks accessible features	Create a compliant wheelchair accessible restroom and correct all features to be accessible if feasible.	2015 ABAAS Section: 603.1 2012 TAS Section: 603.1 2010 ADAS Section: 603.1		
17	Administration Building: Admin - Restrooms	[29.737458, -100.9635218]	The restroom sign does not comply with one or more applicable requirements for the location, height, and properties of the sign.	Lacks any signage	Upon correction to provide an accessible restroom, acquire and mount signage, including Braille, raised lettering and access symbol mounted on wall, latch side of door, 48" to baseline of lowest character and 60" to baseline of highest character.	2015 ABAAS Section: F216.2, 703.1, 703.2, 703.5, 703.6 2012 TAS Section: 216.2, 703.1, 703.2, 703.5, 703.6 2010 ADAS Section: 216.2, 703.1, 703.2, 703.5, 703.6		
18	Administration Building: Admin - Restrooms	[29.737458, -100.9634359]	There are no accessible bathing or shower facilities. Where facilities for bathing are provided for the public, clients or employees, including showers or bathtubs, at least one shower or bathtub and support facilities such as lockers, and not less than 1 percent of all facilities, shall be accessible.	Lacks accessible shower	Create an accessible shower in locker/bathing room.	2015 ABAAS Section: F213.3.6 2012 TAS Section: 213.3.6 2010 ADAS Section: 213.3.6		

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
19	Administration Building: Admin - Restrooms	[29.73781, -100.9634]	Minimum maneuvering clearances at doors and gates shall comply with 404.2.4. Maneuvering clearances shall extend the full width of the doorway and the required latch side or hinge side clearance.	Restroom door - storage in push clearance, sink in pull clearance	Provide required maneuvering clearance on push side of door. Relocate obstacles to provide 48" maneuvering clearance around door.	2015 ABAAS Section: 404.2.4.4, 404.2.4.1 2012 TAS Section: 404.2.4.4, 404.2.4.1 2010 ADAS Section: 404.2.4.4, 404.2.4.1	