

Access Audit Site Report



Devil's Sinkhole State Natural Area

101 N Sweeten St

Rocksprings, TX 78880

Accessibility Evaluation

Inspection Date: 07/27/2022

Inspectors: Tanya Scheibe

Prepared By

WT Group

Engineering with Precision, Pace & Passion.

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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 Devil's Sinkhole State Natural Area located at 101 N Sweeten St, Rocksprings, TX 78880. The facility was inspected on 07/27/2022.

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.

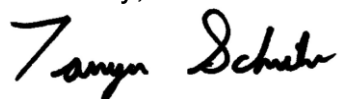
Periodic maintenance to ensure continued accessibility is essential in providing a safe and usable environment. Parking lot markings, signage, door opening pressures, and maintaining clear floor space at doors and other elements and fixtures, available to the public, must be part of an ongoing maintenance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

**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 Devil's Sinkhole State Natural Area;
- Prepare a site report that describes deficits at Devil's Sinkhole State Natural Area, and suggests solutions to those deficits;
- Provide guidance regarding the programs or opportunities Texans can enjoy at Devil's Sinkhole State Natural Area;
- Conduct community engagement events to determine the access preferences and priorities of Texans who visit Devil's Sinkhole State Natural Area;
- Provide a Devil's Sinkhole State Natural Area 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 Devil's Sinkhole State Natural Area;
- Provide a method of tracking barrier removal at Devil's Sinkhole State Natural Area; and
- Report to TPWD leadership and stakeholders.

THIS REPORT

This report addresses program and policy advice, and then the WTG observations of deficits at Devil's Sinkhole State Natural Area. 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 Devil’s Sinkhole State Natural Area. 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 Devil’s Sinkhole State Natural Area. 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 Devil's Sinkhole State Natural Area, 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 Devil's Sinkhole State Natural Area 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 Devil's Sinkhole State Natural Area 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 Devil's Sinkhole State Natural Area.

How Can Programs in General Be Made Accessible?

The title II regulation at section 35.150(b) lists a number of ways to make Devil's Sinkhole State Natural Area 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.

Devil's Sinkhole State Natural Area staff should be aware of, and ready to, provide such modifications.

Are the Devil's Sinkhole State Natural Area Programs Accessible and Inclusive?

In our review of the opportunities available at Devil's Sinkhole State Natural Area, we saw:

- One trail; and
- Seven picnic areas.

Of these, the accessibility status and our recommendation is:

- Maintain the accessibility of the trail and implement the site report retrofits;
- Maintain the one accessible picnic area and implement the site report retrofits;
- Make one more picnic area accessible leaving the remaining five sites as is and inaccessible until later altered for another purpose.

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.


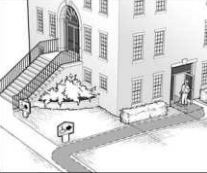
We have sorted campsites into three types: tent only, hybrid (usable by tent or RV), and group. TPWD or Devil's Sinkhole staff can also distinguish these sites by amenities provided (covered tables, water only, electric, scenic views, etc.).

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


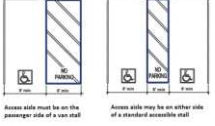

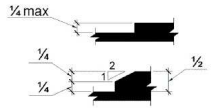

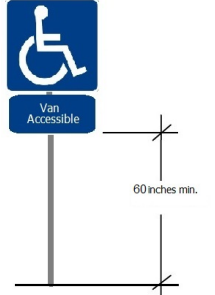
Conclusion

The staff at Devil's Sinkhole State Natural Area 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.


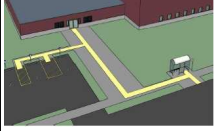



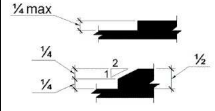
Devil's Sinkhole State Natural Area - 101 N Sweeten St Rocksprings, TX 78880

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
1	Employee Spaces: Employee Spaces	[30.0588522, -100.1103928]	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.	4 buildings near restroom lack route (AR)	Create AR with crushed and compacted stone or similar outdoor material from parking or sidewalk to building entrance.	2015 ABAAS Section: F206.2.1 2012 TAS Section: 206.2.1 2010 ADAS Section: 206.2.1		


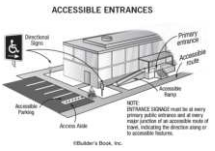

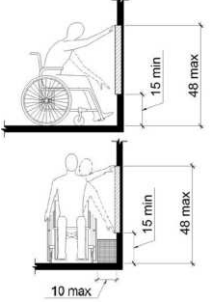
Devil's Sinkhole State Natural Area - 101 N Sweeten St Rocksprings, TX 78880

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
2	Devil's Sinkhole Viewing Area: Parking	[30.05732, -100.1091]	Element meets all standards and requirements	Trailhead parking meets scoping requirements - 0 standard, 1 accessible - (only accessible stall provided at trailhead)	None	2010 ADAS Section: N/A		
3	Devil's Sinkhole Viewing Area: Parking	[30.0579015, -100.1096029]	The access aisle is missing at the accessible parking stall. Access aisles serving parking spaces shall adjoin an accessible route. Two parking spaces shall be permitted to share a common access aisle.	Trailhead parking - Lacks marked access aisle, space is 16' total	Create one or more 8' accessible parking stalls, with one 5' adjacent access aisle, with proper signage and striping.	2015 ABAAS Section: 502.3.1 2012 TAS Section: 502.3.1 2010 ADAS Section: 502.3.1		
4	Devil's Sinkhole Viewing Area: Parking	[30.0579004, -100.1096177]	The parking stall contains abrupt edges and surface irregularities over a 1/4 inch vertical. Parking spaces and access aisles serving them shall be stable, firm, and slip resistant. Access aisles shall be at the same level as the parking spaces they serve. Changes in level are not permitted and shall not be sloped steeper than 2% in any direction.	Trailhead parking - Some stone is loose	Establish protocols for regular and frequent inspection and maintenance of parking surface.	2015 ABAAS Section: 502.4 2012 TAS Section: 502.4 2010 ADAS Section: 502.4		
5	Devil's Sinkhole Viewing Area: Parking	[30.0578957, -100.1096364]	The van stall is missing a sign identifying it as a van accessible stall. Parking space identification signs shall include the International Symbol of Accessibility. Signs identifying van parking spaces shall contain the designation "van accessible."	Trailhead parking - Lacks van accessible sign	Add one van parking sign to one accessible stall and repaint stall and access aisle to 11' and 5' or 8' and 8'.	2015 ABAAS Section: 502.6 2012 TAS Section: 502.6 2010 ADAS Section: 502.6		


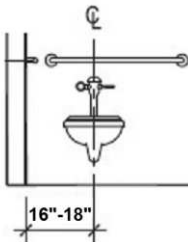

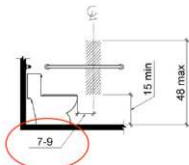

Devil's Sinkhole State Natural Area - 101 N Sweeten St Rocksprings, TX 78880

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
6	Devil's Sinkhole Viewing Area: Parking	[30.0578934, -100.1096418]	The access aisle is not located on an accessible route of travel to the accessible building entrance. Accessible parking spaces serving a particular building shall be located on the shortest accessible route of travel from adjacent parking to an accessible entrance. In buildings with multiple accessible entrances with adjacent parking, accessible parking spaces shall be dispersed and located closest to the accessible entrances.	Trailhead parking - Must use roadway to access trail	Reconfigure accessible stalls to avoid requiring pedestrians to cross vehicular way, in the alternative, leave as is with striped crosswalk.	2015 ABAAS Section: F208.3.1 2012 TAS Section: 208.3.1 2010 ADAS Section: 208.3.1		
7	Devil's Sinkhole Viewing Area: Parking	[30.05732, -100.1091]	Element meets all standards and requirements	Parking near restrooms meets scoping requirements - 14 standard, 1 accessible	None	2010 ADAS Section: N/A		
8	Devil's Sinkhole Viewing Area: Parking	[30.0589845, -100.1099288]	There are no van accessible parking stalls. 1 in every 6, minimum of one, required accessible stalls must be a van accessible stall. There are a total of 14 parking stalls in the parking lot that could be reasonably associated with this facility. There should be a minimum of 1 accessible stalls with a minimum of 1 being designed as van accessible.	Parking near restrooms - lacks van accessible space	Add van parking sign to 1 accessible stall and repaint stall and access aisle to 11' and 5' or 8' and 8'.	2015 ABAAS Section: F208.2, F208.2.4 2012 TAS Section: 208.2, 208.2.4 2010 ADAS Section: 208.2, 208.2.4		
9	Devil's Sinkhole Viewing Area: Parking	[30.0589926, -100.1099275]	The parking stall contains abrupt edges and surface irregularities over a 1/4 inch vertical. Parking spaces and access aisles serving them shall be stable, firm, and slip resistant. Access aisles shall be at the same level as the parking spaces they serve. Changes in level are not permitted and shall not be sloped steeper than 2% in any direction.	Parking near restrooms - loose gravel on surface	Establish protocols for regular and frequent inspection and maintenance of trail surface.	2015 ABAAS Section: 502.4 2012 TAS Section: 502.4 2010 ADAS Section: 502.4		





Devil's Sinkhole State Natural Area - 101 N Sweeten St Rocksprings, TX 78880

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
10	Devil's Sinkhole Viewing Area: Exterior Accessible Route	[30.0590589, -100.1100785]	There is no accessible route to the restroom. At least one accessible route shall connect accessible buildings, accessible facilities, accessible elements, and accessible spaces that are on the same site.	Lacks route (AR) to restroom, gravel, over grown vegetation, 2.5" change in elevation (CIL)	Create an accessible route with crushed stone or other outdoor material from parking or walkway to the restroom.	2015 ABAAS Section: F206.2.2 2012 TAS Section: 206.2.2 2010 ADAS Section: 206.2.2		
11	Devil's Sinkhole Viewing Area: Restrooms	[30.0590571, -100.1100847]	Element meets all standards and requirements	Restroom door complies	None	2010 ADAS Section: N/A		
12	Devil's Sinkhole Viewing Area: Restrooms	[30.0590576, -100.1100803]	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.	Hand sanitizer at 50" above the finished floor (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		





Devil's Sinkhole State Natural Area - 101 N Sweeten St Rocksprings, TX 78880

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
13	Devil's Sinkhole Viewing Area: Restrooms	[30.0590518, -100.1100844]	The toilet is not located within the range allowed from the side wall or partition. The centerline of the toilet must be 16 to 18 inches from the side wall.	Centerline of toilet is 18.75" from side wall	Remount toilets to 16" to 18" from the side wall to centerline.	2015 ABAAS Section: 604.2 2012 TAS Section: 604.2 2010 ADAS Section: 604.2		
14	Devil's Sinkhole Viewing Area: Restrooms	[30.0590472, -100.1100817]	The toilet paper is not installed within the compliant range in front of the toilet. Toilet paper dispensers shall be 7 inches minimum and 9 inches maximum in front of the water closet measured to the centerline of the dispenser. The outlet of the dispenser shall be 15 inches minimum and 48 inches maximum above the finish floor and shall not be located behind grab bars. Dispensers shall not be of a type that controls delivery or that does not allow continuous paper flow. There shall be a clearance of 1 1/2 inches minimum below the grab bar.	TP dispenser not within compliant range	Remount toilet paper dispenser max 7" to 9" from front of toilet, 15" to 48" AFF and min 12" above or 1.5" below grab bar.	2015 ABAAS Section: 604.7 2012 TAS Section: 604.7 2010 ADAS Section: 604.7		
15	Devil's Sinkhole Viewing Area: Viewing Area & Pier	[30.05779, -100.1092]	Visual characters shall be 40 inches (1015 mm) minimum above the finish floor or ground. EXCEPTION: Visual characters indicating elevator car controls shall not be required to comply with 703.5.6.	Text starts about 36" for interpretive signage	Remount signage to min 40" AFF.	2015 ABAAS Section: 703.5.6, 703.5.6 EXCEPTION 2012 TAS Section: 703.5.6, 703.5.6 Exception 2010 ADAS Section: 703.5.6, 703.5.6 Exception		

Devil's Sinkhole State Natural Area - 101 N Sweeten St Rocksprings, TX 78880

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
16	Devil's Sinkhole Viewing Area: Viewing Area & Pier	[30.0575854, -100.1092751]	Tread obstacles on trails, passing spaces, and resting intervals shall not exceed 1/2 inch (13 mm) in height measured vertically to the highest point. EXCEPTION: Where the surface is other than asphalt, concrete, or boards, tread obstacles shall be permitted to not exceed 2 inches (50 mm) in height measured vertically to the highest point.	Change in elevation (CIL) from crushed stone to viewing platform	Repair, bevel or ramp tread obstacle along pathway to max .5" as a smart practice.	2015 ABAAS Section: 1017.5		
17	Devil's Sinkhole Viewing Area: Viewing Area & Pier	[30.05779, -100.1092]	Element meets all standards and requirements	Metal bat texture display complies	None	2010 ADAS Section: N/A		
18	Devil's Sinkhole Viewing Area: Viewing Area & Pier	[30.0575642, -100.1092241]	Each distinct viewing location shall provide a viewing space adjacent to the clear ground space required by 1015.2 through which the point of interest is viewable. The viewing space shall be 32 inches (815 mm) maximum and 51 inches (1295 mm) minimum high above the ground and shall extend the full width of the clear ground space.	safety railing provided at 42", extremely high drop	Consider lowering a 36" wide portion of railing to provide an unobstructed view between 32" and 51" as a smart practice	2015 ABAAS Section: 1015.3		
19	Devil's Sinkhole Viewing Area: Viewing Area & Pier	[30.0577269, -100.1091308]	The surface of outdoor recreation access routes, passing spaces, and resting intervals shall be firm and stable	Lacks route (ORAR) to 10 of 10 benches in viewing area	Repair surface or ORAR to be firm and stable as a smart practice.	2015 ABAAS Section: 1016.2		

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Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
20	Devil's Sinkhole Viewing Area: Viewing Area & Pier	[30.0576462, -100.1093816]	Picnic tables shall provide at least one wheelchair space for each 24 linear feet (7320 mm) of usable table surface perimeter. Wheelchair spaces shall be 30 inches (760 mm) minimum by 48 inches (1220 mm) minimum. Wheelchair spaces shall be positioned for a forward approach to the table and provide knee and toe clearance complying with 306 under the table	Lacks route (ORAR) to picnic table, table not accessible design	Replace picnic table with one with knee and toe clearance, 19" deep at 27" high and 24" deep at 9" high, with a 36" AR around the table.	2015 ABAAS Section: 1011.4.2		
21	Devil's Sinkhole Viewing Area: Trail Surface	[30.0578182, -100.1097069]	The surface of outdoor recreation access routes, passing spaces, and resting intervals shall be firm and stable	Crushed stone surface somewhat loose, displaces easily, plant growth present	Repair surface or ORAR to be firm and stable as a smart practice.	2015 ABAAS Section: 1016.2		
22	Devil's Sinkhole Viewing Area: Picnic Areas	[30.0589892, -100.1102533]	Picnic facilities shall provide outdoor recreation access routes complying with 1016 in accordance with F245.4 and 245.4 of IAC	Crushed stone surface needs maintenance, table and amenities in dirt	Create ORAR with crushed and compacted stone or similar outdoor material from parking or sidewalk to shelter or picnic area.	2015 ABAAS Section: F245.4		
23	Devil's Sinkhole Viewing Area: Picnic Areas	[30.0590054, -100.1102614]	Where picnic facilities contain two or fewer picnic units, each picnic unit shall provide mobility features complying with F245.2.	Lacks route (ORAR) to grill and fire pit	Create an ORAR to shelter or picnic area and provide accessible features as a smart practice.	2015 ABAAS Section: F245.2.1		

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Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
24	Devil's Sinkhole Viewing Area: Picnic Areas	[30.0589973, -100.1102627]	Picnic tables shall provide at least one wheelchair space for each 24 linear feet (7320 mm) of usable table surface perimeter. Wheelchair spaces shall be 30 inches (760 mm) minimum by 48 inches (1220 mm) minimum. Wheelchair spaces shall be positioned for a forward approach to the table and provide knee and toe clearance complying with 306 under the table	Attempt to provide 1 of 7 areas accessible, table has 16" deep toe clearance, surface of picnic area not accessible, lacks AR around table	Replace picnic table with one with knee and toe clearance, 19" deep at 27" high and 24" deep at 9" high, with a 36" AR around the table.	2015 ABAAS Section: 1011.4.2	