Access Audit Site Report





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Park Rd 4 S
Burnet, TX 78611
Accessibility Evaluation
Inspection Date: 08/24/2021
Inspectors: Tanya Scheibe

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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 Longhorn Cavern State Park located at Park Rd 4 S, Burnet, TX 78611. The facility was inspected on 08/24/2021.

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,

Zanya Schule

Tanya Scheibe, RAS #1369



TEXAS PARKS AND WILDLIFE DEPARTMENT LONGHORN CAVERN STATE PARK

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

THIS REPORT

This report addresses program and policy advice, and then the WTG observations of deficits at Longhorn Cavern State Park. 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 address some of the assets at Longhorn Cavern. 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 Longhorn Cavern. 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 standalone 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. This is especially important at Longhorn Cavern State Park where none of the five existing trails are accessible.

 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.

What is Inclusion?

The title II regulation requires Longhorn Cavern State Park 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 picnic areas as an example, inclusive picnicking would locate accessible picnic areas amidst inaccessible picnic areas to facilitate interaction between visitors 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 Longhorn Cavern State Park to apply neutral conditions to determine who uses programs. With picnic tables, if both of the two tables are occupied and a person with a disability is the next to visit the site, the neutral concept of "capacity" applies and that visitor has no place to picnic. If that visitor is the second person to seek a table and one is unoccupied, that visitor gets a table.

How Can Programs in General Be Made Accessible?

The title II regulation at section 35.150(b) lists a number of ways to make Longhorn Cavern State Park 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.



Longhorn Cavern State Park staff should be aware of, and ready to, provide such modifications.

Are the Longhorn Cavern State Park Programs Accessible and Inclusive?

In our review of the opportunities available at Longhorn Cavern, we saw:

- Five trails; and
- Two picnic areas.

Of these, the accessibility status and our recommendation is:

- Make one of the five trails accessible, and leave the other four trails as is and inaccessible until later altered for other purposes; and
- Make one of the two picnic areas accessible, and leave the remaining picnic area as is and inaccessible until later altered for another purpose.

Concessionaires

If concessionaires are to provide outdoor recreation experiences at the Park, those assets too must include accessible amenities.

Conclusion

The staff at Longhorn Cavern State Park 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.

JNM/TRS/LONGHORN CAVERN STATE PARK PROGRAM REPORT 202301



Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos Figure
1	Visitor Center: Visitor Center Parking	[30.6849245 -98.351644 9]	There are not enough accessible parking stalls. Each lot where parking is provided for the public as clients, guests or employees, shall provide accessible parking and shall be located on the shortest accessible route of travel from adjacent parking to an accessible entrance. There are a total of 98 parking stalls in the parking lot that could be reasonably associated with this facility. There should be a minimum of accessible stalls based on the total: 1-25: 1 accessible/1 van 26-35: 2 accessible/1 van 36-50: 3 accessible/1 van 51-100: 4 accessible/1 van 101-300: 8 accessible/2 van 301-500: 12 accessible/2 van 501-800: 16 accessible/3 van 801-1000: 20 accessible/4 van 1001-over: 20 accessible plus 1 for every 100 spaces/1 of every 6 should be a van stall	Lacks required number of accessible parking spaces (98 standard, 1 accessible)	Create one or more 8' accessible parking stalls, with one 5' adjacent access aisle, with proper signage and striping based on the total number of stalls.	2015 ABAAS Section: F208.2 2010 ADAS Section: 208.2	
2	Visitor Center: Visitor Center Parking	[30.6849821 -98.351656 9]	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 98 parking stalls in the parking lot that could be reasonably associated with this facility. There should be a minimum of 4 accessible stalls with a minimum of 1 being designed as van accessible.	Lacks required width of access aisle (88") for a van accessible parking space	Add van parking sign to 1 accessible stall and repaint stall and access aisle to 11' and 5' or 8' and 8' per the table	2015 ABAAS Section: F208.2, F208.2.4 2012 TAS Section: 208.2, 208.2.4 2010 ADAS Section: 208.2, 208.2,	Section of Principles (Section Principles) Section of Principles
3	Visitor Center: Visitor Center Parking	[30.6845819 -98.351068 2]	The accessible parking space and/or access aisle contains loose gravel and/or surface materials that do not provide for a stable, firm slip resistant surface. Parking spaces and access aisles serving them shall comply with floor or ground surface requirements. The ground surface shall be stable, firm, and slip resistant. Access aisles shall be at the same level as the parking spaces they serve. Changes in level, slopes exceeding 1:48, and detectable warnings shall not be permitted.	Accessible stall and access aisle lack firm and stable surface due to loose rock/gravel on asphalt	Maintain surface to be free of debris	2015 ABAAS Section: 502.4 2012 TAS Section: 502.4 2010 ADAS Section: 502.4	

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
4	Visitor Center: Visitor Center Parking	,	The parking sign is mounted too low. Parking space identification signs shall include the International Symbol of Accessibility complying with. Signs identifying van parking spaces shall contain the designation "van accessible." Signs shall be 60 inches minimum above the finish floor or ground surface measured to the bottom of the sign.	parking sign 50.5"	Raise existing accessible parking signs so lowest end of bottom sign is min 60" aff	2015 ABAAS Section: 502.6 2012 TAS Section: 502.6 2010 ADAS Section: 502.6	S PS CS LS OS OF ALL OF PREFERENCES	Van Accessible 60 nches min.

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
5	Visitor Center: Visitor Center Exterior Accessible Route	[30.6844989 -98.350995 8]	The accessible route contains cross slopes greater than 2%. Cross slopes shall not exceed one unit vertical in 48 units horizontal (2-percent slope).	Cross slope of 3.7% Unable to measure running slope of inclined walkway due to active construction (recommend measuring slope for compliance post- construction)	Correct or repair cross slope along AR to max 2.08%	2015 ABAAS Section: 403.3 2012 TAS Section: 403.3 2010 ADAS Section: 403.3		THE STATE OF THE S

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
6	Visitor Center: Visitor Center Exterior Accessible Route	[30.6841956 -98.350846 9]	There is no accessible route to the Backbone Ridge Nature Trail trailhead. At least one accessible route shall connect accessible buildings, accessible facilities, accessible elements, and accessible spaces that are on the same site.	Lacks accessible route to the Backbone Ridge Nature Trail trailhead	Create an accessible route with crushed stone or other outdoor material from parking or walkway to the Backbone Ridge Nature Trail trailhead	2015 ABAAS Section: F206.2.2 2012 TAS Section: 206.2.2 2010 ADAS Section: 206.2.2		ACCESSIBLE ENTRANCES POPUT CONTROL OF THE POPUT CO
7	Visitor Center: Visitor Center Exterior Accessible Route	[30.6846615 -98.350753]	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.	CIL of 1"	Repair, bevel or ramp CIL along AR	2012 TAS Section: 303.2, 303.3 2010 ADAS Section: 303.2, 303.3		½ max ½ ½ ½ ½ ½ ½

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
8	Visitor Center: Visitor Center Exterior Accessible Route	[30.6846731 -98.350723 5]	The accessible route contains loose gravel and/or surface materials that do not provide for a stable, firm slip resistant surface. Floor and ground surfaces shall be stable, firm, and slip resistant.	Accessible route from accessible parking to building lacks a firm and stable surface (loose gravel)	Create AR with crushed and compacted stone or similar outdoor material from parking or sidewalk to the building	2015 ABAAS Section: 302.1 2012 TAS Section: 302.1 2010 ADAS Section: 302.1		Categor is feel further before the control of the c
9	Visitor Center: Visitor Center Exterior Accessible Route	[30.6846281 -98.350804]	The accessible route contains loose gravel and/or surface materials that do not provide for a stable, firm slip resistant surface. Floor and ground surfaces shall be stable, firm, and slip resistant.	Lacks accessible route to and clear ground space at garbage can (loose gravel)	Relocate 20% of garbage cans to be along AR	2015 ABAAS Section: 302.1 2012 TAS Section: 302.1 2010 ADAS Section: 302.1		Datagon is final between physics and the control of

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
10	Visitor Center: Visitor Center Employee Spaces	[30.68462, -98.35115]	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. Handactivated 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.	employee room- storage push side, knob hardware	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	2010 ADAS Section: 404.2.3, 404.2.7, 404.2.4, 404.2.11, Exception		
11	Visitor Center: Visitor Center Employee Spaces	[30.68462, -98.35115]	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. The sweep period for doors with closers shall be adjusted so that from an open position of 70 degrees, the door will take at least 3 seconds to move to a point 3 inches from the latch, measured to the leading edge of the door. 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.	employee room 2- desk pull side, hardware 31.25", closes fast	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, inspect, adjust, and maintain closing speed on door closers For all doors along the public circulation route, remount hardware to be 34" to 48" aff	2010 ADAS Section: 404.2.3, 404.2.7, 404.2.4, 404.2.11, Exception		

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
12	Visitor Center: Visitor Center Public Spaces	[30.68462, -98.35115]	The kitchen entry extends down too close to the route of travel. Any obstruction that overhangs a route of travel must be a minimum of 80 inches above the walking surface as measured from the bottom of the obstruction.	76" overhead at kitchen entry	Raise the kitchen area entry to min 80", or pad object to prevent hazard in overhead clearance along AR	2015 ABAAS Section: 307.4 2012 TAS Section: 307.4 2010 ADAS Section: 307.4	Parameter and the second secon	
13	Visitor Center: Visitor Center Public Spaces	[30.68462, -98.35115]	Element meets all standards and requirements	Theater Room meets all standards and requirements	None	2010 ADAS Section: N/A		
14	Visitor Center: Visitor Center Public Spaces	[30.68462, -98.35115]	Photo booth is not accessible. Opportunities and programs made available for public use must be accessible.	photo booth activity is not accessible	Provide an accessible photo booth or alternate similar experience	2015 ABAAS Section: Reco mmended 2012 TAS Section: Reco mmended 2010 ADAS Section: Reco mmended	PROTO BOOTH	
15	Visitor Center: Visitor Center Public Spaces	[30.68462, -98.35115]	Exterior doors are recommended to be maintained at 8.5 lbf as a smart practice. Force is to be measured at the operating hardware or 30 inches from the hinges, whichever is greater. The doormat is not secured in place at the entry door. If carpet or carpet tile is used on a ground or floor surface, then it shall be securely attached; have a firm cushion, pad or backing or no cushion or pad; and have a level loop, textured loop, level-cut pile or level-cut/uncut pile texture. The maximum pile height shall be 1/2 inch. Exposed edges of carpet shall be fastened to floor surfaces and have trim along the entire length of the exposed edge. Recessed doormats shall be adequately anchored to prevent interference with wheelchair traffic.	Rear double doors -18#, floor mat not secured	For all doors along the public circulation route, inspect, adjust, and maintain 8.5 lbf to open exterior doors as a smart practice 3" aff Remove or secure mat at door to prevent trip hazard	2010 ADAS Section: 404.2.3, 404.2.7, 404.2.4, 404.2.11, Exception		

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
16	Visitor Center: Visitor Center Public Spaces	[30.68462, -98.35115]	Exterior doors are recommended to be maintained at 8.5 lbf as a smart practice. Force is to be measured at the operating hardware or 30 inches from the hinges, whichever is greater. If carpet or carpet tile is used on a ground or floor surface, then it shall be securely attached; have a firm cushion, pad or backing or no cushion or pad; and have a level loop, textured loop, level-cut pile or level-cut/uncut pile texture. The maximum pile height shall be 1/2 inch. Exposed edges of carpet shall be fastened to floor surfaces and have trim along the entire length of the exposed edge. Recessed doormats shall be adequately anchored to prevent interference with wheelchair traffic.	Front double doors - 14#, floor mat not secured	For all doors along the public circulation route, provide required maneuvering clearance on push and pull side of doors Remove or secure mat at door to prevent trip hazard 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, repair, bevel, or ramp CILs at door entries to max .25" For all doors along the public circulation route, repair, provide beveled threshold For all doors along the public circulation route, inspect, adjust, and maintain 5 lbf to open interior doors For all doors along the public circulation route, inspect, adjust, and maintain closing speed on door closers For all doors along the public circulation route, inspect, adjust, and maintain 8.5 lbf to open exterior doors as a smart practice 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 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, Exception		
17	Visitor Center: Visitor Center Public Spaces	[30.68462, -98.35115]	The transaction counter provides for a parallel approach and is not within the required height range. Transaction counters shall be 36 inches high maximum and a minimum of 36 inches wide and should extend the same depth as the sales or service counter tops.	Transaction counter 37" aff	Lower 36" wide segment of service counter to max 36" aff, in the alternative, train staff to come out from around the counter to provide customer service	2015 ABAAS Section: 904.4.1 2012 TAS Section: 904.4.1 2010 ADAS Section: 904.4.1	LIME SPEEK WALL STATE AND MH105	36° Max.

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
18	Visitor Center: Visitor Center Public Spaces	[30.6844032 -98.350881 8]	Element meets all standards and requirements	Bench in back of building meets all standards and requirements	None	2010 ADAS Section: N/A		
19	Visitor Center: Visitor Center Public Spaces	[30.6843593 -98.351045 4]	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	4 of 4 tables on the patio are not of an accessible design	Replace picnic table with one of an accessible design as a smart practice	2015 ABAAS Section: 1011.4.2		
20	Visitor Center: Visitor Center Public Spaces	[30.6842371 -98.350932 7]	There is no accessible route to the 2 picnic tables, white chairs, and small table. At least one accessible route shall connect accessible buildings, accessible facilities, accessible elements, and accessible spaces that are on the same site.	Lacks accessible route to 2 picnic tables (not accessible design), white chairs, and small table	Create an accessible route with crushed stone or other outdoor material from parking or walkway to the 2 picnic tables, white chairs, and small table Replace one picnic table with one that is of an accessible design as a smart practice	2015 ABAAS Section: F206.2.2 2012 TAS Section: 206.2.2 2010 ADAS Section: 206.2.2		ACCESSIBLE ENTRANCES Printing Accessible Entrances Printing

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
21	Visitor Center: Visitor Center Restrooms	[30.68462, -98.35115]	The restroom sign does not comply with one or more applicable requirements for the location, height, and properties of the sign.	both restrooms lack compliant signage	Acquire and mount signage, including Braille 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 28 Z 8 Z 8 Z 8 Z 8 Z 8 Z 8 Z 8 Z 8 Z 8	FUC.
22	Visitor Center: Visitor Center Restrooms	[30.68462, -98.35115]	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 restrooms on site	Create at least one 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		SO" MIN. CLEAR, SO" MIN.

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
23	CCC Administration Building: CCC Administration Building Exterior Accessible Route	[30.6845877 -98.350932 7]	The path of contains multiple issues and is not accessible. The path of travel exceeds the maximum allowable cross and running slope requirements. It also contains changes in level and/or gaps that exceed the allowable maximum requirements. The path of travel does not meet the minimum width requirements for clearances, turning spaces, and/or passing spaces. The floor or ground surface is not firm, stable, and slip resistant.	steps are only means of access to building, slope of 16.2%, and natural stone pavers on route of travel around building creating many CILs	Create AR with crushed and compacted stone or similar outdoor material from parking or sidewalk to the building. In the alternative, provide a ramp for access.	2015 ABAAS Section: 403.1 2010 ADAS Section: 403.1		
24	CCC Administration Building: CCC Administration Building Exterior Accessible Route	[30.6844828 -98.350639]	The accessible route of travel on the accessible route contains cross slopes greater than 2%. Cross slopes shall not exceed one unit vertical in 48 units horizontal (2-percent slope).	Cross slope of 8.2% behind the Visitor's Center near the danger sign	Correct or repair cross slope along AR to max 2.08%	2015 ABAAS Section: 403.3 2012 TAS Section: 403.3 2010 ADAS Section: 403.3		

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
25	CCC Administration Building: CCC Administration Building Exterior Accessible Route	[30.6844851 -98.350618 9]	Element meets all standards and requirements	Bench at rear of Visitor's Center meets all standards and requirements	None	2010 ADAS Section: N/A		
26	CCC Administration Building: CCC Administration Building Exterior Accessible Route	[30.6845393 -98.350901 9]	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.	CIL of .75" on left side of building entry	Repair, bevel or ramp CIL along AR	2012 TAS Section: 303.2, 303.3 2010 ADAS Section: 303.2, 303.3		1 max
27	CCC Administration Building: CCC Administration Building Exterior Accessible Route	[30.684688, -98.350639]	The accessible route of travel on the accessible route contains cross slopes greater than 2%. Cross slopes shall not exceed one unit vertical in 48 units horizontal (2-percent slope).	Cross slope of 4.2% near right side entry	Correct or repair cross slope along AR to max 2.08%	2015 ABAAS Section: 403.3 2012 TAS Section: 403.3 2010 ADAS Section: 403.3		The state of the s
28	CCC Administration Building: CCC Administration Building Exterior Accessible Route	[30.68471, -98.350581 4]	There is no accessible route to the rear of building, to the water spout, to the picnic table, from picnic area to building, and to the observation platform on top of the building. At least one accessible route shall be provided to accessible facilities, accessible elements, and accessible spaces that are on the same site. The clear width must be a minimum 36 inches.	Lacks accessible route to the rear of building due to steps and natural rock pavers, to water spout, to picnic table, from picnic area to building due to stairs, and to the observation platform on top of the building due to steps	Create an AR to the rear of building, to the water spout, to the picnic table, from picnic area to building, and to the observation platform on top of the building; in the alternative to providing an accessible route up to the observation platform, provide a similar experience and connect an accessible route to that viewing opportunity	2015 ABAAS Section: F206.2.2 2012 TAS Section: 206.2.2 2010 ADAS Section: 206.2.2		ACCESSIBLE FLIDMINTS Framework

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos Figure
29	Concessionaire Maintenance Building (near water well): Concessionaire Maintenance Building (near water well)	[30.68462, -98.35115]	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. The threshold has a vertical change greater than 1/4 inch high. 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.	maintenance entry- steps and dirt pull side, CILs due to step, knob	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, repair, bevel, or ramp CILs at door entries to max .25" For all doors along the public circulation route, repair, provide beveled threshold For all doors along the public circulation route, replace hardware with lever hardware or hardware operable without a tight pinch or grasp	2010 ADAS Section: 404.2.3, 404.2.7, 404.2.4, 404.2.11, Exception	
30	Concessionaire Maintenance Building (near water well): Concessionaire Maintenance Building (near water well)	[30.68462, -98.35115]	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 spaces and elements.	Lacks accessible route to storage building/shed	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	

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Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
31	CCC Cabin: CCC Cabin Employee Spaces	[30.68462, -98.35115]	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 has a vertical change greater than 1/4 inch high.	CCC Cabin storage door - 31" wide, and CIL/steps of 6"	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, repair, bevel, or ramp CILs at door entries to max .25"	2010 ADAS Section: 404.2.3, 404.2.7, 404.2.4, 404.2.11, Exception	28 29 30 31 81 33 2 3 3 5 6 7 7 8 1 33 2 1 8 1 3 3 3 7 8 1 3 3 3 7 8 1 8 1 3 3 3 7 8 1 8 1 3 3 3 7 8 1 8 1 3 3 3 7 8 1 8 1 8 1 3 3 3 7 8 1 8 1 8 1 8 1 8 1 8 1 8 1 8 1 8 1 8	
32	CCC Cabin: CCC Cabin Employee Spaces	[30.6839142 -98.353311 9]	There is no accessible route to the CCC Cabin. At least one accessible route shall connect accessible buildings, accessible facilities, accessible elements, and accessible spaces that are on the same site.	Lacks accessible route to the CCC Cabin	Create an accessible route with crushed stone or other outdoor material from parking or walkway to the CCC Cabin	2015 ABAAS Section: F206.2.2 2012 TAS Section: 206.2.2 2010 ADAS Section: 206.2.2		ACCESSIBLE ENTRANCES Proposed and the second secon

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
	CCC Observation Tower: CCC Observation Tower	[30.6839303 -98.352448 2]	There is no accessible route to 14 picnic tables, 3 garbage cans, and 1 fire ring. At least one accessible route shall connect accessible buildings, accessible facilities, accessible elements, and accessible spaces that are on the same site.	Lacks accessible route to 14 picnic tables, 3 garbage cans, and 1 fire ring	Create an accessible route with crushed stone or other outdoor material from parking or walkway to 3 picnic tables, 1 garbage can, and 1 fire ring	2015 ABAAS		ACCESSIBLE ENTRANCES Of Districted Section 2015 Access 2015 Acces

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
34	CCC Observation Tower: CCC Observation Tower	[30.6852382 -98.352323 5]	There is no accessible route to the Original Water Tank Structure . At least one accessible route shall connect accessible buildings, accessible facilities, accessible elements, and accessible spaces that are on the same site.	Lacks accessible route to the Original Water Tank Structure	Create an accessible route with crushed stone or other outdoor material from parking or walkway to the Original Water Tank Structure	2015 ABAAS Section: F206.2.2 2012 TAS Section: 206.2.2 2010 ADAS Section: 206.2.2		ACCESSIBLE ENTRANCES Topics of grant of the control of the contro
35	CCC Observation Tower: CCC Observation Tower	[30.6846015 -98.352737 9]	There is no accessible route to the CCC Observation Tower shelter area. At least one accessible route shall connect accessible buildings, accessible facilities, accessible elements, and accessible spaces that are on the same site.	Lacks accessible route to the CCC Observation Tower picnic shelter area	Create an accessible route with crushed stone or other outdoor material from parking or walkway to the CCC Observation Tower shelter area	2015 ABAAS Section: F206.2.2 2012 TAS Section: 206.2.2 2010 ADAS Section: 206.2.2		ACCESSIBLE DITRANCES Transport of the property of the propert

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
36	CCC Observation Tower: CCC Observation Tower	[30.6846062 -98.352748 6]	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	2 of 2 picnic tables are not of an accessible design	Replace both picnic tables with ones of an accessible design as a smart practice	2015 ABAAS Section: 1011.4.2		
37	CCC Observation Tower: CCC Observation Tower	[30.6845739 -98.352818 3]	At least one accessible route (i.e. elevator, ramp or platform lift) shall connect each story and mezzanine in multistory buildings and facilities. The elevator exemption note below does not apply to Title II government facilities and entities. Tittle II facilities must make their programs accessible. If vertical access cannot be achieved, then the program must be relocated, removed or made accessible. The mezzanine area is approximately 165 sq. ft. and currently contains a means of observation for patrons. It may possible to covert this area to am employee work/storage area and relocate the items to the lower level, or prohibit ALL public access and require staff to access this area on behalf of the public, or provide vertical access via an elevator, lift or ramp. The following buildings and facilities do not require vertical access: In private buildings or facilities that are less than three stories or that have less than 3000 square feet per story, an accessible route shall not be required to connect stories provided that the building or facility is not a shopping center, a shopping mall, the professional office of a health care provider, a terminal, depot or other station used for specified public transportation, an airport passenger terminal, or another type of facility as determined by the Attorney General.	Lacks accessible route to the top of the CCC Observation Tower (stairs are the only means of access)	Provide vertical access to upper levels if feasible; in the alternative, leave as is and provide a similar accessible experience	2015 ABAAS Section: F206.2.3 2012 TAS Section: 206.2.3 2010 ADAS Section: 206.2.3		Americans with Disabilities Act Title II Regulations Mondamentum to those of building to him and Load disasteem lovels Payment II. 301 Americans II. 301

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38	CCC Observation Tower: CCC Observation Tower	[30.6845877 -98.352780 8]	The accessible route contains loose gravel and/or surfaces that do not provide for a stable, firm slip resistant surface.	Lacks firm and stable surface on accessible route of CCC Observation Tower due to natural rock surface	Resurface AR where deterioration occurs	2015 ABAAS Section: 302.1 2012 TAS Section: 302.1 2010 ADAS Section: 302.1		Datago is feel freeze before the freeze before t
39	CCC Observation Tower: CCC Observation Tower	[30.6845854 , -98.352735 2]	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.	CIL (step) at entry to CCC Observation Tower picnic shelter area	Repair, bevel or ramp CIL along AR	2012 TAS Section: 303.2, 303.3 2010 ADAS Section: 303.2, 303.3		½ max ½ ½ ½ ½ ½

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos Figure
40	Cave Area: Exterior Accessible Route	[30.6844539 -98.350342 7]	The cave ceiling extends down too close to the route of travel. Any obstruction that overhangs a route of travel must be a minimum of 80 inches above the walking surface as measured from the bottom of the obstruction.	cave - overhead clearance reduces throughout	Add padding or rails if possible to reduce injury in cave	2015 ABAAS Section: 307.3 2012 TAS Section: 307.3 2010 ADAS Section: 307.3	Any Projection
41	Cave Area: Exterior Accessible Route	[30.6843386 -98.350136 1]	There is no accessible route between elements in the site. An accessible route of travel must connect all elements and spaces within a facility.	Lacks accessible route to the cave entrance, 52 stairs to entrance	Leave as is lack of vertical access into cave as doing so would be technically infeasible and provide a similar experience through a video or other means. If vertical access is provided at a later date, make improvements to the cave when possible to improve accessibility along the public accessed areas.	2015 ABAAS Section: F206.2.4 2012 TAS Section: 206.2.4 2010 ADAS Section: 206.2.4	

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
42	Cave Area: Exterior Accessible Route	[30.6843559	There is a gap spaced greater than a 1/2 inch. Openings in floor or ground surfaces shall not allow passage of a sphere more than 1/2 inch diameter. Elongated openings shall be placed so that the long dimension is perpendicular to the dominant direction of travel.	1" gap near railing, 3" near danger cave entrance sign, 1" near communications box, and 1" near garbage can	Correct or fill gaps to be max .5"	2015 ABAAS Section: 302.3 2012 TAS Section: 302.3 2010 ADAS Section: 302.3		Acceptance described in the second projection of the second projection of the second described described in the second described in the second described in the second projection of the second proj

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
43	Cave Area: Exterior Accessible Route	[30.6844851 -98.350655 1]	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.	CIL/step of 5" near building corner, and CIL of 1" near garbage can	Repair, bevel or ramp CIL along AR	2012 TAS Section: 303.2, 303.3 2010 ADAS Section: 303.2, 303.3		½ max ½ ½ ½ ½ ½
44	Cave Area: Exterior Accessible Route	[30.6842901 -98.350325 2]	At least one outdoor recreation access route shall connect accessible elements, spaces, and facilities provided within picnic units with mobility features. The force required to operate the element exceeds the maximum. The force required to activate operable parts is 5 pounds maximum.	Garbage can is not on an accessible route and its lid exceeds 5 lbs of force to open	Relocate 20% of garbage cans to be along AR Adjust operating mechanism to be usable with 5 lbf or less	2015 ABAAS Section: 309.4 2012 TAS Section: 309.4 2010 ADAS Section: 309.4		

Finding Number Area Description Lat/Long Finding As Built Recommendation Citation Photos	Figure
45 Cave Area: Stellor Accessible Route 98.35037 1 1 1 1 1 1 1 1 1	

Number	n Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
46 Cave Area: Exterior Accessible Rou	,	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.	Multiple gaps and CILs due upheaval and deterioration of natural rock pavers	Repair or reset pavers to eliminate change in level.	2012 TAS Section: 303.2, 303.3 2010 ADAS Section: 303.2, 303.3		½ max ½ ½ ½ ½ ½ ½