

Access Audit Site Report



Prepared By
WT Group

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Old Tunnel State Park
10619 Old San Antonio Rd
Fredericksburg, TX 78624
Accessibility Evaluation
Inspection Date: 09/26/2022
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 Old Tunnel State Park located at 10619 Old San Antonio Rd, Fredericksburg, TX 78624. The facility was inspected on 09/26/2022.

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
OLD TUNNEL 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 Old Tunnel State Park;
- Prepare a site report that describes deficits at Old Tunnel State Park, and suggests solutions to those deficits;
- Provide guidance regarding the programs or opportunities Texans can enjoy at Old Tunnel State Park;
- Conduct community engagement events to determine the access preferences and priorities of Texans who visit Old Tunnel State Park;
- Provide a Old Tunnel 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 Old Tunnel State Park;
- Provide a method of tracking barrier removal at Old Tunnel 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 Old Tunnel 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 however address some of the assets at Old Tunnel State Park. 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 Old Tunnel State Park. 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. ***This is especially important at Old Tunnel, where the only existing trail is not 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 Old Tunnel 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 Old Tunnel State Park to apply neutral conditions to determine who uses programs.

Again, using picnic areas, if there are three picnic areas and a person with a disability is the fourth person on site and the three picnic areas are already occupied, the neutral concept of “capacity” applies and that visitor has no place to picnic until a picnic area is vacated.

How Can Programs in General Be Made Accessible?

The title II regulation at section 35.150(b) lists a number of ways to make Old Tunnel 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.

Old Tunnel State Park staff should be aware of, and ready to, provide such modifications.

Are the Old Tunnel State Park Programs Accessible and Inclusive?

In our review of the opportunities available at Old Tunnel, we saw:

- One trail;
- Three picnic areas; and
- Two viewing areas.

Of these, the accessibility status and our recommendation is:

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


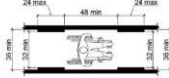

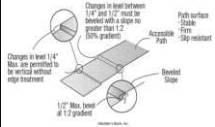

Concessionaires

If concessionaires are to provide recreation experiences at the Park, those too must be accessible.




Conclusion




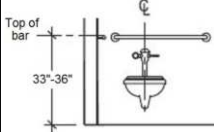
The staff at Old Tunnel State Park offer experiences and assets desired by park visitors. Those same experiences and assets must be accessible to and usable by people with disabilities. See the following site report to identify barriers and recommendations for barrier removal.



Old Tunnel State Park - 10619 Old San Antonio Rd Fredericksburg, TX 78624


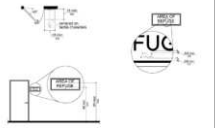


Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
1	Headquarters Area: HQ - Exterior Accessible Route	[30.1013434, -98.8208473]	The walking surface is obstructed. A 36 inch minimum clear walking surface is required.	Vehicles can overlap and obstruct route (AR) when parked	Mount signage or place parking stops preventing cars from blocking adjacent AR.	2015 ABAAS Section: 403.5.1 2012 TAS Section: 403.5.1 2010 ADAS Section: 403.5.1		
2	Headquarters Area: HQ - Exterior Accessible Route	[30.101495, -98.820869]	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.	Debris on sidewalk and at crossing	Establish protocols for regular and frequent inspection and maintenance of walkway surface.	2015 ABAAS Section: 302.1 2012 TAS Section: 302.1 2010 ADAS Section: 302.1		
3	Headquarters Area: HQ - Exterior Accessible Route	[30.10139, -98.82091]	The running slope of walking surfaces shall not be steeper than 1:20. The cross slope of walking surfaces shall not be steeper than 1:48.	3% cross at head of accessible stalls, 2.3% along main parking lot, 3.1% in overflow lot	Correct running slopes to max 5% and cross to max 2.08%.	2012 TAS Section: 403.3 2010 ADAS Section: 403.3		


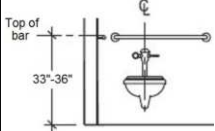


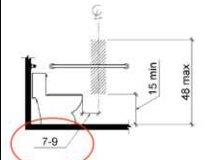
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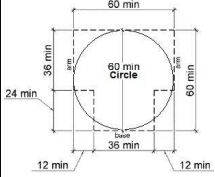

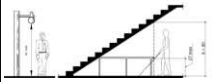
Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
4	Headquarters Area: HQ - Employee Spaces	[30.1013818 , -98.8206327]	Spaces and elements within employee work areas shall only be required to comply with 206.2.8, 207.1, and 215.3 and shall be designed and constructed so that individuals with disabilities can approach, enter, and exit the employee work area. Employee work areas, or portions of employee work areas, other than raised courtroom stations, that are less than 300 square feet (28 m2) and elevated 7 inches (180 mm) or more above the finish floor or ground where the elevation is essential to the function of the space shall not be required to comply with these requirements or to be on an accessible route.	Maintenance shed - lacks route (AR), knob, CIL to enter	Create an accessible route with crushed stone or other outdoor material from parking or walkway to storage shed. Repair, bevel, or ramp CILs at door entries to max .25". Replace hardware with lever hardware or hardware operable without a tight pinch or grasp.	2015 ABAAS Section: F203.9 2012 TAS Section: 203.9 2010 ADAS Section: 203.9		
5	Headquarters Area: HQ - Employee Spaces	[30.1013964 , -98.8204455]	Spaces and elements within employee work areas shall only be required to comply with 206.2.8, 207.1, and 215.3 and shall be designed and constructed so that individuals with disabilities can approach, enter, and exit the employee work area. Employee work areas, or portions of employee work areas, other than raised courtroom stations, that are less than 300 square feet (28 m2) and elevated 7 inches (180 mm) or more above the finish floor or ground where the elevation is essential to the function of the space shall not be required to comply with these requirements or to be on an accessible route.	Admin building - lacks route, knobs, 1.75" threshold, steps to access	Provide required maneuvering clearance on push and pull side of doors. Repair, bevel, or ramp CILs at door entries to max .25". Repair, provide beveled threshold. Replace hardware with lever hardware or hardware operable without a tight pinch or grasp. Extend a pathway away from the building for emergency egress.	2015 ABAAS Section: F203.9 2012 TAS Section: 203.9 2010 ADAS Section: 203.9		
6	Headquarters Area: HQ - Men's Restroom	[30.1010823 , -98.8207277]	The threshold is greater than 1/2 inch high. The threshold at a doorway shall be no higher than 1/2 inch. Changes in level between 1/4 inch and 1/2 inch must be beveled at 1:2 or less. 1/4 inch is the maximum vertical rise.	Men's restroom door - .5" CIL on push side of threshold, 1.25" CIL on pull side of threshold	For all doors along the public circulation route, replace thresholds at exterior doors with ADA thresholds.	2015 ABAAS Section: 404.2.5 2012 TAS Section: 404.2.5 2010 ADAS Section: 404.2.5		


Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
7	Headquarters Area: HQ - Men's Restroom	[30.1010875 , -98.820718 2]	The required 56 inches by 60 inches clear floor space for the water closet has been obstructed. The clear floor space around the water closet shall be 60 inches minimum measured perpendicular from the side wall and 56 inches minimum measured perpendicular from the rear wall.	Storage in toilet clearance	Relocate storage to provide required 60" clearance around toilet.	2015 ABAAS Section: 604.3. 2012 TAS Section: 604.3.1 2010 ADAS Section: 604.3.1		
8	Headquarters Area: HQ - Men's Restroom	[30.101084, -98.820724 9]	The side grab bars are not in the correct location. Grab bars on the side wall must be installed so that the end closest to the rear wall is maximum 12" from the rear wall. The end furthest from the rear wall must be mounted minimum 54" from the rear wall.	Bar ends 52.75" from rear wall	Remount side grab bar to max 12" from the rear wall at the close end and min 54" on the far end, and 33" to 36" AFF.	2015 ABAAS Section: 604.5.1 2012 TAS Section: 604.5.1 2010 ADAS Section: 604.5.1		
9	Headquarters Area: HQ - Men's Restroom	[30.1010771 , -98.820726 3]	The rear grab bar is not 36" long or is not mounted in the correct location. The rear grab bar must be a minimum of 36" long and extend from the toilet centerline a minimum 12" towards the wall side and a minimum 24" towards the open side of the toilet. Grab bars shall be installed in a horizontal position, 33 inches minimum and 36 inches maximum above the finish floor measured to the top of the gripping surface and the space between the grab bar and the top of the tank shall be 1-1/2 inches minimum.	rear bar 10.5" towards side wall	Remount rear grab bar to behind the toilet, 12" to the wall side of center and 24" to the open side and 33" to 36" AFF.	2015 ABAAS Section: 604.5.2 2012 TAS Section: 604.5.2 2010 ADAS Section: 604.5.2		

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
10	Headquarters Area: HQ - Men's Restroom	[30.1010829 , -98.820722 2]	The grab bar height and/or spacing fails. Grab bars must be mounted between 33" and 36" to the top of the gripping surface. There must be 1.5" of clearance between the grab bar and the wall. There must be a minimum of 1.5" of clearance below and minimum 12" above the grab bar to any dispenser or other obstruction.	Rear bar 36.5" AFF (above the finished floor), side bar 37" AFF	Remount grab bars in accessible stall to 33" to 36" above the finished floor (AFF).	2015 ABAAS Section: 609.3, 609.4 2012 TAS Section: 609.4, 609.3 2010 ADAS Section: 609.3, 609.4		
11	Headquarters Area: HQ - Women's Restroom	[30.101082, -98.820725 4]	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.	Women's restroom door - wall pull side	Provide required maneuvering clearance around pull side of door.	2015 ABAAS Section: 404.2.4.1 , 404.2.4.4 2012 TAS Section: 404.2.4.4, 404.2.4.1 2010 ADAS Section: 404.2.4.4, 404.2.4.1		




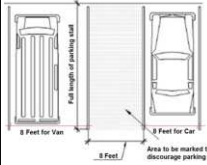
Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
12	Headquarters Area: HQ - Women's Restroom	[30.1010783 , -98.820720 1]	The restroom sign does not comply with one or more applicable requirements for the location, height, and properties of the sign.	Sign on hinge side	Remount signage on wall, latch side of the 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		
13	Headquarters Area: HQ - Women's Restroom	[30.1010887 , -98.820720 1]	The required 56 inches by 60 inches clear floor space for the water closet has been obstructed. The clear floor space around the water closet shall be 60 inches minimum measured perpendicular from the side wall and 56 inches minimum measured perpendicular from the rear wall.	Garbage can and storage in front clearance of toilet	Relocate garbage can and storage to provide required 60" clearance around toilet.	2015 ABAAS Section: 604.3. 2012 TAS Section: 604.3.1 2010 ADAS Section: 604.3.1		
14	Headquarters Area: HQ - Women's Restroom	[30.1010922 , -98.820724 2]	The side grab bars are not in the correct location. Grab bars on the side wall must be installed so that the end closest to the rear wall is maximum 12" from the rear wall. The end furthest from the rear wall must be mounted minimum 54" from the rear wall.	Side grab bar ends 53" from rear wall	Remount side grab bar to max 12" from the rear wall at the close end and min 54" on the far end, and 33" to 36" AFF.	2015 ABAAS Section: 604.5.1 2012 TAS Section: 604.5.1 2010 ADAS Section: 604.5.1		

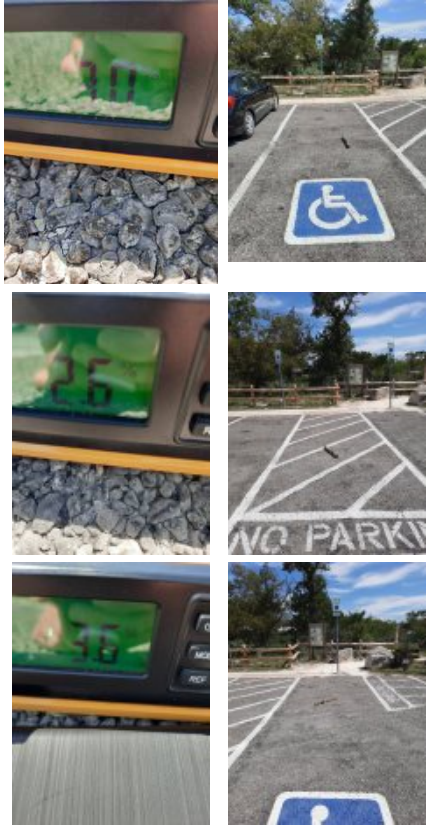
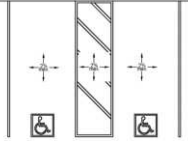
Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
15	Headquarters Area: HQ - Women's Restroom	[30.1010806 , -98.8207228]	The rear grab bar is not 36" long or is not mounted in the correct location. The rear grab bar must be a minimum of 36" long and extend from the toilet centerline a minimum 12" towards the wall side and a minimum 24" towards the open side of the toilet. Grab bars shall be installed in a horizontal position, 33 inches minimum and 36 inches maximum above the finish floor measured to the top of the gripping surface and the space between the grab bar and the top of the tank shall be 1-1/2 inches minimum.	rear bar 10" to wall side	Remount rear grab bar to behind the toilet, 12" to the wall side of center and 24" to the open side and 33" to 36" AFF.	2015 ABAAS Section: 604.5.2 2012 TAS Section: 604.5.2 2010 ADAS Section: 604.5.2		
16	Headquarters Area: HQ - Women's Restroom	[30.1010887 , -98.8207228]	The grab bar height and/or spacing fails. Grab bars must be mounted between 33" and 36" to the top of the gripping surface. There must be 1.5" of clearance between the grab bar and the wall. There must be a minimum of 1.5" of clearance below and minimum 12" above the grab bar to any dispenser or other obstruction.	Both bars 37" above the finished floor (AFF)	Remount grab bars in accessible stall to 33" to 36" above the finished floor (AFF).	2015 ABAAS Section: 609.3, 609.4 2012 TAS Section: 609.4, 609.3 2010 ADAS Section: 609.3, 609.4		
17	Headquarters Area: HQ - Women's Restroom	[30.1010794 , -98.8207188]	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 is 6.5" in front of toilet	Remount toilet paper dispenser 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		

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
18	Headquarters Area: HQ - Women's Restroom	[30.10125, -98.82081]	There is insufficient turning space within this room or space. The space required for a wheelchair to make a 180-degree turn is a clear space of 60 inches in diameter or a T-shaped space.	space is limited due to toilet	Enlarge restroom to provide minimum 60" turning space	2015 ABAAS Section: 304.3.1, 304.3.2 2012 TAS Section: 304.3.1, 304.3.2 2010 ADAS Section: 304.3.1, 304.3.2		
19	Headquarters Area: HQ - Women's Restroom	[30.1010829, -98.8207242]	An item or items project more than 4 inches into the circulation path. Wall-mounted objects that have leading edges between 27 inches and 80 inches from the floor must not project more than 4 inches into the circulation path. Protruding objects that extend to the floor or within 27 inches of the floor are cane detectable and are therefore not hazardous. Where it is necessary or desirable to have objects protrude from the wall, a manner of cane detection must be provided.	Hooks protrude	Relocate protruding objects or place cane detectable warning or bollard at foot of item.	2015 ABAAS Section: 307.2 2012 TAS Section: 307.2 2010 ADAS Section: 307.2		



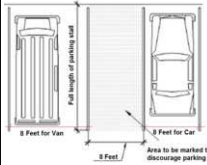


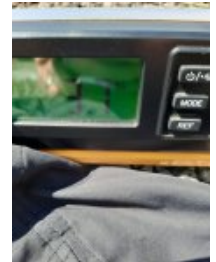



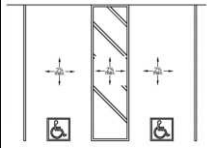
Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
20	Headquarters Area: Portable Toilets	[30.10177, -98.82095]	The portable public restroom is not compliant. 5% of portable toilets must be accessible, minimum of 1. If sanitary facilities are provided, they must be made accessible to persons with disabilities. If public restrooms are desired, It is recommended that the portable unit be replaced with a permanent built in compliant restroom. The utilization of an accessible portable unit may be a temporary solution and is not recommended as a permanent solution.	1 of 3 portable toilets is of an accessible design - fails to meet many accessibility requirements	Replace 5% of portable toilets with compliant models and place along AR.	2015 ABAAS Section: F213.1 2012 TAS Section: 213.1 2010 ADAS Section: 213.1, 213.2 Exception 3		


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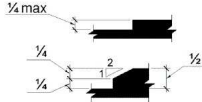
Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
21	Parking Lots: Parking - Main Lot	[30.10127, -98.82085]	Element meets all standards and requirements	main lot parking scoping complies- 7 standard, 2 accessible	None	2010 ADAS Section: N/A		
22	Parking Lots: Parking - Main Lot	[30.10127, -98.82085]	The accessible parking stall is not wide enough. Each parking space must be at least 8' feet wide and shall be marked to define the width. The measurements of parking spaces and access aisles shall be made from the centerline of the markings. Where the parking space is not adjacent to another parking space or access aisle, the measurement shall be permitted to include the full width of the line defining the parking space.	Left stall - 94.25" wide	Repaint stalls to be 8' wide each.	2015 ABAAS Section: 502.2 2012 TAS Section: 502.2 2010 ADAS Section: 502.2	  	


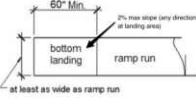

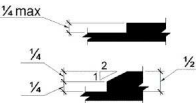
Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
23	Parking Lots: Parking - Main Lot	[30.10127, -98.82085]	The cross slopes (narrow dimension) and/or running slopes (long dimension) of the access aisle exceeds 2%. The running slope and the cross slope in an accessible parking stall and the access aisle must not exceed 2%.	Left stall - 3%, shared access aisle (AA) - 2.6%, right stall - 3.6%	Repair or correct slope of parking space and access aisle to max 2.08% in any direction.	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
24	Parking Lots: Parking - Main Lot	[30.10127, -98.82085]	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.	CILs due to rough stone and binding agent surface, with many dips and depressions throughout all stalls and access aisles (AAs) and at head of AA	Resurface stalls and access aisles to eliminate gaps and cracks.	2015 ABAAS Section: 502.4 2012 TAS Section: 502.4 2010 ADAS Section: 502.4		
25	Parking Lots: Parking - Overflow	[30.101916, -98.8207588]	Element meets all standards and requirements	64 standard, 4 accessible	None	2010 ADAS Section: N/A		

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
26	Parking Lots: Parking - Overflow	[30.101887, -98.820713 2]	The accessible parking stall is not wide enough. Each parking space must be at least 8' feet wide and shall be marked to define the width. The measurements of parking spaces and access aisles shall be made from the centerline of the markings. Where the parking space is not adjacent to another parking space or access aisle, the measurement shall be permitted to include the full width of the line defining the parking space.	Left-middle stall - 94.5" wide	Repaint stalls to be 8' wide each.	2015 ABAAS Section: 502.2 2012 TAS Section: 502.2 2010 ADAS Section: 502.2	 	
27	Parking Lots: Parking - Overflow	[30.1018742 , -98.820809 8]	The cross slopes (narrow dimension) and/or running slopes (long dimension) of the access aisle exceeds 2%. The running slope and the cross slope in an accessible parking stall and the access aisle must not exceed 2%.	Left-most stall - 5.2%, left access aisle (AA) - 3.7%, left-middle stall - 6.4%, right- middle stall - 3.3%, right AA - 5.2%, right- most stall 6.1%; large slope at foot of right side stalls and AA	Repair or correct slope of parking space and access aisle to max 2.08% in any direction.	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
								


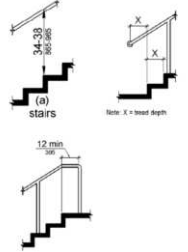
Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
28	Parking Lots: Parking - Overflow	[30.10188, -98.820812 5]	The parking stall contains abrupt edges and surface irregularities over a 1/4 inch vertical. Parking spaces and access aisles serving them shall 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.	Rough stone and binding agent surface has many dips and depressions causing CILs	Resurface stalls and access aisles to eliminate gaps and cracks.	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
29	Upper Viewing Area: Upper Viewing Area	[30.1011383 , -98.820824]	The landing at the bottom of the ramp has a slope greater than 2%. Bottom landings shall have a dimension in the direction of ramp run of not less than 60 inches and have a slope of less than 2% in any direction.	Slope of 4.4% on bottom landing (gravel, crusher fine-esque)	Correct ramp landing slope to max 2.08%.	2015 ABAAS Section: 405.7.1, 405.7.1 EXCEPTION 2012 TAS Section: 405.7.1, 405.7.1 Exception 2010 ADAS Section: 405.7.1, 405.7.1 Exception		
30	Upper Viewing Area: Upper Viewing Area	[30.1011337 , -98.820821 3]	There is a change in level greater than 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.	2" change in elevation (CIL) at bottom of ramp	Repair, bevel or ramp CIL along accessible route (AR) to max .25".	2015 ABAAS Section: 303.3 2012 TAS Section: 303.3 2010 ADAS Section: 303.3		




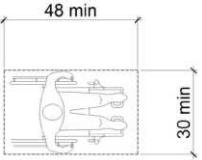
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Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
31	Upper Viewing Area: Upper Viewing Area	[30.1011198 , -98.82082]	The handrail is not continuous the entire length of the ramp. The handrail must be continuous. Handrails shall be placed on each side of each ramp, shall be continuous the full length of the ramp. The inside handrail on switch back or dogleg ramps shall always be continuous. Handrail shall have top and bottom extensions.	Lacks compliant extensions at top and bottom of ramp	Replace handrail with one that is continuous along the full length of the ramp and having required top and bottom extensions.	2015 ABAAS Section: 505.3, 505.10.1 2012 TAS Section: 505.3, 505.10.1 2010 ADAS Section: 505.3, 505.10.1		
32	Upper Viewing Area: Upper Viewing Area	[30.1011244 , -98.8208173]	The handrail extension does not terminate properly. Extensions shall return to a wall, guard, or the landing surface, or shall be continuous to the handrail of an adjacent ramp run.	Lacks rounded or continued extensions	Replace handrails with ones that are rounded and/or extend to the ground. Pricing in previous finding.	2015 ABAAS Section: 505.10.1 2012 TAS Section: 505.10.1 2010 ADAS Section: 505.10.1		
33	Upper Viewing Area: Upper Viewing Area	[30.10104, -98.82078]	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.	Seating area provided with wheelchair spaces at the top of deck only, but view is obstructed by 41" high railing	Lower a 36" wide portion of railing to provide an unobstructed view between 32" and 51"	2015 ABAAS Section: 1015.3		




Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
34	Upper Viewing Area: Upper Viewing Area	[30.10106, -98.82071]	The surface of trails, passing spaces, and resting intervals shall be firm and stable	project to replace the material of trail surface and grade at some areas with loose surface type, currently staff allow wheelchair users to park at location closer to lower viewing area for access to that area (access provided at upper area)	Replace surface of trail with one that is firm and stable as a smart practice. Establish protocols for regular and frequent inspection and maintenance of accessible trail surface as a smart practice. Frequently maintain trail surface in identified washout areas to assure CIL's remain 2" or less and gaps are filled as a smart practice.	2015 ABAAS Section: 1017.2		

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
35	Upper Viewing Area: Upper Viewing Area	[30.1010715 , -98.8207715]	Stairways must have handrails on both sides. Handrails and their extensions must be between 34 inches and 38 inches above the stair nosing or ground. The top handrails shall extend a minimum of 12 inches beyond the top nosing and shall be parallel with the floor or ground surface. At the bottom of a stair flight, handrails shall extend at the slope of the stair flight for a horizontal distance at least equal to one tread depth beyond the last riser nosing. Extension shall return to a wall, guard, or the landing surface, or shall be continuous to the handrail of an adjacent stair flight. The orientation of at least one handrail, including the extension, shall be in the direction of the run of the stair and perpendicular to the direction of the stair nosing. Handrail gripping surfaces with a circular cross section shall have an outside diameter of 1-1/4 inches minimum and 2 inches maximum. Handrail gripping surfaces with a non-circular cross section shall have a perimeter dimension of 4 inches minimum and 6 1/4 inches maximum, and a cross-section dimension of 2-1/4 inches maximum. The hand grip portion of handrails shall have a smooth surface with no sharp corners. Gripping surfaces (top or sides) shall be uninterrupted by newel posts, other construction elements or obstructions. Any wall or other surface adjacent to the handrail shall be free of sharp or abrasive elements. Handrails projecting from a wall shall have a space of 1-1/2 inches minimum between the wall and the handrail.	Stairs next to ramp lacks handrails on both sides of ramp; stairs near restrooms lacks handrail one side and extensions	Install handrails on both sides of stairway, mounted 34" to 38" AFF with top and bottom extensions and having a 1.25" – 2" in diameter, or a non-circular grip that has a perimeter dimension of 4"- 6.25" max with a min gap of 1.5" between handrail and wall.	2015 ABAAS Section: 505.2 2012 TAS Section: 505.2 2010 ADAS Section: 505.2		


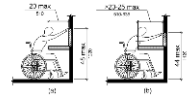

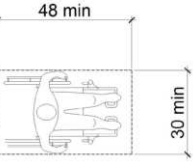

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Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
36	Upper Viewing Area: Upper Viewing Area	[30.1010394, -98.8207863]	Visual characters shall be 40 inches (1015 mm) minimum above the finish floor or ground. EXCEPTION: Visual characters indicating elevator car controls shall not be required to comply with 703.5.6.	Interpretive signs mounted low	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		
37	Upper Viewing Area: Upper Viewing Area	[30.1010376, -98.8208616]	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.	Bat house sign mounted low	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		
38	Upper Viewing Area: Upper Viewing Area	[30.1012, -98.82082]	The operable part is not accessible because there is not adequate clear floor space for either a forward or side approach. The clear floor or ground space shall be 30 inches minimum by 48 inches minimum.	Map sign at parking lacks clear ground space (CGS)	Provide required 30" by 48" CFS at signs.	2015 ABAAS Section: 305.3 2012 TAS Section: 305.3 2010 ADAS Section: 305.3	 	

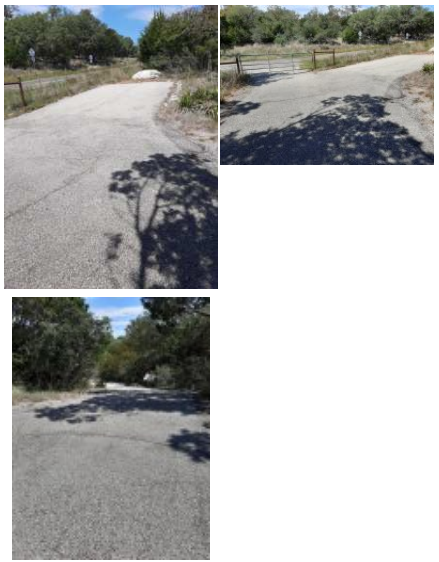

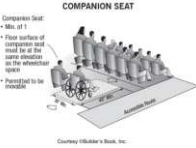
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Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
39	Upper Viewing Area: Upper Viewing Area	[30.1011641 , -98.820507 3]	Picnic facilities shall provide outdoor recreation access routes complying with 1016 in accordance with F245.4 and 245.4 of IAC	Crushed stone surface is somewhat loose, some overgrowth, many larger rocks	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		
40	Upper Viewing Area: Upper Viewing Area	[30.1011525 , -98.820534 2]	Picnic tables are required to have clear ground space 36 inches (915 mm) on all usable sides of the table measured from the back edge of the benches.	Table is accessible design but lacks clearance around all sides	Provide required 36" clear ground space around all usable portions of the table as a smart practice.	2015 ABAAS Section: 1011.2.1		
41	Upper Viewing Area: Upper Viewing Area	[30.1011548 , -98.820531 5]	Where picnic facilities contain two or fewer picnic units, each picnic unit shall provide mobility features complying with 245.2. Where picnic facilities contain more than two picnic units, at least 20 percent, but not less than two, of the picnic units shall provide mobility features complying with 245.2.	1 of 3 designated accessible	Provide an AR and accessible tables to shelter/picnic area to achieve the required number accessible.	2015 ABAAS Section: F245.1		

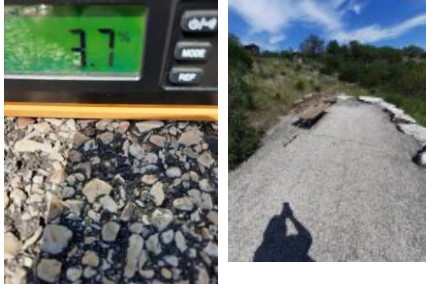

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Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
42	Upper Viewing Area: Upper Viewing Area	[30.1011659 , -98.820691 3]	Where a high forward reach is over an obstruction, the clear floor space shall extend beneath the element for a distance not less than the required reach depth over the obstruction. The high forward reach shall be 48 inches (1220 mm) maximum where the reach depth is 20 inches (510 mm) maximum. Where the reach depth exceeds 20 inches (510 mm), the high forward reach shall be 44 inches (1120 mm) maximum and the reach depth shall be 25 inches (635 mm) maximum. Where a clear floor or ground space allows a parallel approach to an element and the high side reach is over an obstruction, the height of the obstruction shall be 34 inches (865 mm) maximum and the depth of the obstruction shall be 24 inches (610 mm) maximum. The high side reach shall be 48 inches (1220 mm) maximum for a reach depth of 10 inches (255 mm) maximum. Where the reach depth exceeds 10 inches (255 mm), the high side reach shall be 46 inches (1170 mm) maximum for a reach depth of 24 inches (610 mm) maximum.	Decomposition exhibit operable parts up to 62", lacks CGS	Lower operating mechanisms to max 48" above the finished floor (AFF) to highest operable part. Provide 30" by 48" CGS at operable parts	2015 ABAAS Section: 308.2.1, 308.3.2 2012 TAS Section: 308.2.1, 308.3.2 2010 ADAS Section: 308.2.1, 308.3.2		
43	Upper Viewing Area: Upper Viewing Area	[30.1011655 , -98.820694 6]	The operable part is not accessible because there is not adequate clear floor space for either a forward or side approach. The clear floor or ground space shall be 30 inches minimum by 48 inches minimum.	Lacks clear floor space (CFS) at cutouts	Provide required 30" by 48" CFS at operable parts.	2015 ABAAS Section: 305.3 2012 TAS Section: 305.3 2010 ADAS Section: 305.3		
44	Upper Viewing Area: Upper Viewing Area	[30.1011575 , -98.820795 8]	Benches shall have a 36" by 48" clear ground space (CGS) positioned near the bench with one side of the space adjoining an outdoor recreation access route (ORAR) or trail, as applicable The CGS shall not overlap with the ORAR or trail or another CGS	0 of 4 benches comply - stone surface somewhat loose and is uneven	Construct firm, stable, and slip resistant pads at least 36" by 48" adjacent to 20% of benches, and locate along an AR as a smart practice.	2015 ABAAS Section: 1011.2.1		



Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
45	Upper Viewing Area: Upper Viewing Area	[30.1010939 , -98.820860 3]	At least one accessible route shall connect accessible buildings, accessible facilities, accessible elements, and accessible spaces that are on the same site. For areas of sport activity, an accessible route is required to connect to the boundary of each area of sport activity. The size of an area of sport activity includes only the space needed to play. Where multiple sports fields or courts are provided, an accessible route is required to each field or area of sport activity. 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.	Garbage and handle 50" above ground level, surface of clear ground space (CGS) not compliant	Provide an accessible route (AR) to each element within the site. Remount operable parts to be in reach range of 15" min to 48" max.	2010 ADAS Section: 206.2.2, 206.2		


Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure																																																																																																																																																																																				
46	Lower Viewing Area: Lower Viewing Area	[30.1007082, -98.8211634]	There are no or 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 (XX) parking stalls in the parking lot that could be reasonably associated with this facility. There should be a minimum of (XX) accessible stalls with a minimum of (XX) being designed as van accessible.	Lower viewing area accessible parking area (used by request, accessed via locked gate) - 2 standard, 0 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 2012 TAS Section: 208.2 2010 ADAS Section: 208.2		<table border="1"> <thead> <tr> <th>Total Number of Parking Spaces</th> <th>Minimum Number of Accessible Parking Spaces</th> </tr> </thead> <tbody> <tr><td>12</td><td>2</td></tr> <tr><td>13</td><td>2</td></tr> <tr><td>14</td><td>2</td></tr> <tr><td>15</td><td>2</td></tr> <tr><td>16</td><td>2</td></tr> <tr><td>17</td><td>2</td></tr> <tr><td>18</td><td>2</td></tr> <tr><td>19</td><td>2</td></tr> <tr><td>20</td><td>2</td></tr> <tr><td>21</td><td>2</td></tr> <tr><td>22</td><td>2</td></tr> <tr><td>23</td><td>2</td></tr> <tr><td>24</td><td>2</td></tr> <tr><td>25</td><td>2</td></tr> <tr><td>26</td><td>2</td></tr> <tr><td>27</td><td>2</td></tr> <tr><td>28</td><td>2</td></tr> <tr><td>29</td><td>2</td></tr> <tr><td>30</td><td>2</td></tr> <tr><td>31</td><td>2</td></tr> <tr><td>32</td><td>2</td></tr> <tr><td>33</td><td>2</td></tr> <tr><td>34</td><td>2</td></tr> <tr><td>35</td><td>2</td></tr> <tr><td>36</td><td>2</td></tr> <tr><td>37</td><td>2</td></tr> <tr><td>38</td><td>2</td></tr> <tr><td>39</td><td>2</td></tr> <tr><td>40</td><td>2</td></tr> <tr><td>41</td><td>2</td></tr> <tr><td>42</td><td>2</td></tr> <tr><td>43</td><td>2</td></tr> <tr><td>44</td><td>2</td></tr> <tr><td>45</td><td>2</td></tr> <tr><td>46</td><td>2</td></tr> <tr><td>47</td><td>2</td></tr> <tr><td>48</td><td>2</td></tr> <tr><td>49</td><td>2</td></tr> <tr><td>50</td><td>2</td></tr> <tr><td>51</td><td>2</td></tr> <tr><td>52</td><td>2</td></tr> <tr><td>53</td><td>2</td></tr> <tr><td>54</td><td>2</td></tr> <tr><td>55</td><td>2</td></tr> <tr><td>56</td><td>2</td></tr> <tr><td>57</td><td>2</td></tr> <tr><td>58</td><td>2</td></tr> <tr><td>59</td><td>2</td></tr> <tr><td>60</td><td>2</td></tr> <tr><td>61</td><td>2</td></tr> <tr><td>62</td><td>2</td></tr> <tr><td>63</td><td>2</td></tr> <tr><td>64</td><td>2</td></tr> <tr><td>65</td><td>2</td></tr> <tr><td>66</td><td>2</td></tr> <tr><td>67</td><td>2</td></tr> <tr><td>68</td><td>2</td></tr> <tr><td>69</td><td>2</td></tr> <tr><td>70</td><td>2</td></tr> <tr><td>71</td><td>2</td></tr> <tr><td>72</td><td>2</td></tr> <tr><td>73</td><td>2</td></tr> <tr><td>74</td><td>2</td></tr> <tr><td>75</td><td>2</td></tr> <tr><td>76</td><td>2</td></tr> <tr><td>77</td><td>2</td></tr> <tr><td>78</td><td>2</td></tr> <tr><td>79</td><td>2</td></tr> <tr><td>80</td><td>2</td></tr> <tr><td>81</td><td>2</td></tr> <tr><td>82</td><td>2</td></tr> <tr><td>83</td><td>2</td></tr> <tr><td>84</td><td>2</td></tr> <tr><td>85</td><td>2</td></tr> <tr><td>86</td><td>2</td></tr> <tr><td>87</td><td>2</td></tr> <tr><td>88</td><td>2</td></tr> <tr><td>89</td><td>2</td></tr> <tr><td>90</td><td>2</td></tr> <tr><td>91</td><td>2</td></tr> <tr><td>92</td><td>2</td></tr> <tr><td>93</td><td>2</td></tr> <tr><td>94</td><td>2</td></tr> <tr><td>95</td><td>2</td></tr> <tr><td>96</td><td>2</td></tr> <tr><td>97</td><td>2</td></tr> <tr><td>98</td><td>2</td></tr> <tr><td>99</td><td>2</td></tr> <tr><td>100</td><td>2</td></tr> </tbody> </table>	Total Number of Parking Spaces	Minimum Number of Accessible Parking Spaces	12	2	13	2	14	2	15	2	16	2	17	2	18	2	19	2	20	2	21	2	22	2	23	2	24	2	25	2	26	2	27	2	28	2	29	2	30	2	31	2	32	2	33	2	34	2	35	2	36	2	37	2	38	2	39	2	40	2	41	2	42	2	43	2	44	2	45	2	46	2	47	2	48	2	49	2	50	2	51	2	52	2	53	2	54	2	55	2	56	2	57	2	58	2	59	2	60	2	61	2	62	2	63	2	64	2	65	2	66	2	67	2	68	2	69	2	70	2	71	2	72	2	73	2	74	2	75	2	76	2	77	2	78	2	79	2	80	2	81	2	82	2	83	2	84	2	85	2	86	2	87	2	88	2	89	2	90	2	91	2	92	2	93	2	94	2	95	2	96	2	97	2	98	2	99	2	100	2
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47	Lower Viewing Area: Lower Viewing Area	[30.10043, -98.82094]	The wheelchair seating spaces are not on an accessible route. Wheelchair seating spaces shall adjoin accessible routes and shall not overlap circulation paths. Accessible routes shall not overlap wheelchair spaces.	Lacks AR to lower viewing area and wheelchair spaces; 2 benches on paved area used as accessible spaces but aren't integrated in main lower viewing area	Create an accessible route with crushed stone or other outdoor material from parking or walkway to the main lower level viewing area.	2015 ABAAS Section: 802.1.4, 802.1.5 2012 TAS Section: 802.1.4, 802.1.5 2010 ADAS Section: 802.1.4, 802.1.5		 <p>COMPANION SEAT</p> <ul style="list-style-type: none"> Companion Seat Wheelchair Benches Path Viewing Area <p>Courtesy: iStockphoto.com</p>																																																																																																																																																																																				

Old Tunnel State Park - 10619 Old San Antonio Rd Fredericksburg, TX 78624

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
48	Lower Viewing Area: Lower Viewing Area	[30.1006889 , -98.820835]	Benches shall have a 36" by 48" clear ground space (CGS) positioned near the bench with one side of the space adjoining an outdoor recreation access route (ORAR) or trail, as applicable The CGS shall not overlap with the ORAR or trail or another CGS	Lacks CFS at both benches at lower accessible viewing area - slopes all around both benches	Construct firm, stable, and slip resistant pads at least 36" by 48" adjacent to 20% of benches, and locate along an AR as a smart practice.	2015 ABAAS Section: 1011.2.1		
49	Lower Viewing Area: Lower Viewing Area	[30.1006491 , -98.8209647]	The running slope of walking surfaces shall not be steeper than 1:20. The cross slope of walking surfaces shall not be steeper than 1:48.	Cross slopes of 3.8% to 5.8% for 100' from accessible seating benches at lower viewing area to gated accessible parking area	Correct running slopes to max 5% and cross to max 2.08%.	2012 TAS Section: 403.3 2010 ADAS Section: 403.3		

Old Tunnel State Park - 10619 Old San Antonio Rd Fredericksburg, TX 78624

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
50	Lower Viewing Area: Lower Viewing Area	[30.10052, -98.82102]	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.	3 of 3 signs are mounted low	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		
51	Lower Viewing Area: Lower Viewing Area	[30.1006473, -98.8211164]	The running slope of walking surfaces shall not be steeper than 1:20. The cross slope of walking surfaces shall not be steeper than 1:48.	14.3% running near accessible parking area near lower viewing area	Correct running slopes to max 5% and cross to max 2.08%.	2012 TAS Section: 403.3 2010 ADAS Section: 403.3		

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
52	Trails: Trails - Surface	[30.0994164, -98.8204721]	The surface of trails, passing spaces, and resting intervals shall be firm and stable	Trail lacks firm and stable surface - crushed stone surface sometimes larger gravel, lots of steps, some larger tree roots, narrow in some locations, other trails natural surface	Establish protocols for regular and frequent inspection and maintenance of accessible trail surface as a smart practice. Frequently maintain trail surface in identified washout areas to assure CIL's remain 2" or less and gaps are filled as a smart practice. Replace surface of trail with one that is firm and stable as a smart practice.	2015 ABAAS Section: 1017.2		
53	Trails: Trails - Features	[30.10106, -98.82071]	The operable part is not accessible because there is not adequate clear floor space for either a forward or side approach. The clear floor or ground space shall be 30 inches minimum by 48 inches minimum.	sign on upper trail lacks CGS, dirt trail	Provide required 30" by 48" CFS at sign	2015 ABAAS Section: 305.3 2012 TAS Section: 305.3 2010 ADAS Section: 305.3	