

Access Audit Site Report



Ray Roberts Lake State Park - Greenbelt Unit

100 P W 4137

Pilot Point, TX 76258

Accessibility Evaluation

Inspection Date: 10/20/2021

Inspectors: Tanya Scheibe

Prepared By

WT Group

Engineering with Precision, Pace & Passion.

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July 28, 2023

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

Dear Jessica,

Thank you for the opportunity to be of service to you by performing an accessibility evaluation for the Ray Roberts Lake State Park - Greenbelt Unit located at 100 P W 4137, Pilot Point, TX 76258. The facility was inspected on 10/20/2021.

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.

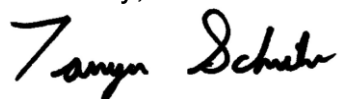
Periodic maintenance to ensure continued accessibility is essential in providing a safe and usable environment. Parking lot markings, signage, door opening pressures, and maintaining clear floor space at doors and other elements and fixtures, available to the public, must be part of an ongoing maintenance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



Tanya Scheibe, RAS #1369

**TEXAS PARKS AND WILDLIFE DEPARTMENT
RAY ROBERTS LAKE STATE PARK - GREENBELT UNIT
AMERICANS WITH DISABILITIES ACT COMPLIANCE INITIATIVE
PROGRAM AND POLICY REPORT**

JULY 28, 2023

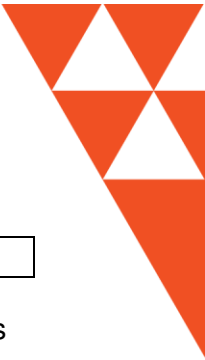
INTRODUCTION

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

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

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

We note here that the two Greenbelt areas are contained mostly within Ray Roberts SP/SNA but we have separated those two areas out into this report.



THIS REPORT

This report addresses program and policy advice, and then the WTG observations of deficits at Ray Roberts Lake State Park - Greenbelt Unit. Other deliverables are provided under separate cover.

What is a Program?

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

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

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

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

The Federal and Texas Accessibility Standards

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

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

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

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

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

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

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

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

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

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

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

Conditions for Exceptions at Certain Outdoor Recreation Assets

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

What is Inclusion?

The title II regulation requires Ray Roberts Lake State Park - Greenbelt Unit programs to be available in the most integrated setting. This is defined as the setting in which people with and without disabilities interact together. Using 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 Ray Roberts Lake State Park - Greenbelt Unit to apply neutral conditions to determine who uses programs. Using picnic areas again, if there are 10 picnic areas and all are occupied, and an eleventh person with a disability arrives, the neutral concept of “capacity” applies and that visitor has no place to picnic until a picnic area is vacated, or as may happen, those occupying a picnic area invite the person to their area.

How Can Programs in General Be Made Accessible?

The title II regulation at section 35.150(b) lists a number of ways to make Ray Roberts Lake State Park - Greenbelt Unit programs accessible. These include but are not limited to:

- Removing architectural barriers;
- Removing communication barriers;
- Changing rules and policies;
- Providing additional staff training;
- Providing different staff ratios;
- Providing adaptive equipment;
- Providing auxiliary aids and services such as a sign language interpreter;
- Providing accessible transportation when transportation is part of the opportunity;
- Reassignment of services to accessible locations;
- Conducting duplicate opportunities, one in accessible location and the other in an inaccessible location;
- Designing and constructing new facilities that are therefore fully compliant;

- Home visits; and
- Other methods that make programs accessible.

Ray Roberts Lake State Park - Greenbelt Unit staff should be aware of, and ready to, provide such modifications.

Are the Ray Roberts Lake State Park - Greenbelt Unit Programs Accessible and Inclusive?

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

- Two boating areas;
- Two trails; and
- 11 picnic areas.

Of these, the accessibility status and our recommendation is:

- Make one of the boating areas accessible, leaving the other as is and inaccessible until later altered for another purpose;
- Maintain the one accessible trail and implement the site report retrofits, leaving the other trail as is and inaccessible until later altered for another purpose;
- Maintain the four accessible picnic areas and implement the site report retrofits, while leaving the remaining seven picnic areas as is and inaccessible until later altered for another purpose.

Concessionaires





TPWD is prohibited from using contractors or concessionaires that discriminate on the basis of disability. If concessionaires are to provide outdoor recreation experiences at the Park, those sites too must include accessible amenities.



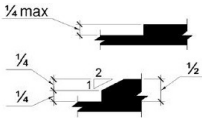
Conclusion

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



Ray Roberts Lake State Park - Greenbelt Unit - 100 P W 4137 Pilot Point, TX 76258


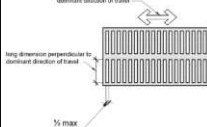

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
1	FM 428 Access Point: FM 428 - Parking	[33.307885, -97.040599 7]	There are no accessible parking stalls. Each lot where parking is provided for the public as clients, guests or employees, shall provide accessible parking and shall be located on the shortest accessible route of travel from adjacent parking to an accessible entrance. There are a total of 75 parking stalls in the parking lot that could be reasonably associated with this facility. There should be a minimum of 3 accessible stalls with a minimum of 1 being designed as van accessible.	Parking fails scoping requirements - 38 parking stops, but approximately 75 total standard parking spaces, 2 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		
2	FM 428 Access Point: FM 428 - Parking	[33.307662, -97.040771 4]	The surfaces of the accessible parking spaces and access aisles are not firm, stable, and slip resistant. Floor and ground surfaces shall be stable, firm, and slip resistant. Parking spaces and access aisles serving them shall comply with 302. Access aisles shall be at the same level as the parking spaces they serve. Changes in level are not permitted.	Loose debris in stalls, faded paint throughout lot	Establish protocols for regular and frequent inspection and maintenance of parking surface. Repaint stalls and access aisles to be 8' and 5' each.	2015 ABAAS Section: 502.4, 302.1 2012 TAS Section: 502.4, 302.1 2010 ADAS Section: 502.4, 302.1		
3	FM 428 Access Point: FM 428 - Parking	[33.307607, -97.040826 3]	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.	Van accessible signs are low at 57"	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		

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
4	FM 428 Access Point: FM 428 - Picnic Area	[33.3075913 , -97.041377 5]	Openings in the surface of outdoor recreation access routes shall not allow the passage of a sphere more than 1/2 inch (13 mm) in diameter. Advisory: Spaces between the boards in a boardwalk and drainage grates are examples of openings. Where possible, drainage grates should be located outside the minimum clear width of the outdoor recreation access route. Elongated openings should be placed so that the long dimension is perpendicular, or as close to perpendicular as possible, to the dominant direction of travel	2.25" gap at picnic area at woods	Correct or fill gaps along the ORAR to max .5" as a smart practice.	2015 ABAAS Section: 1016.6, Advisory 1016.6		
5	FM 428 Access Point: FM 428 - Picnic Area	[33.3076126 , -97.041401 7]	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.	1.5" change in level (CIL) at picnic area by woods, 2" at picnic area nearest to restrooms, 1.25" at shelter closest to restrooms	Repair, bevel or ramp CIL along AR.	2012 TAS Section: 303.2, 303.3 2010 ADAS Section: 303.2, 303.3		





Ray Roberts Lake State Park - Greenbelt Unit - 100 P W 4137 Pilot Point, TX 76258

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
6	FM 428 Access Point: FM 428 - Picnic Area	[33.3077819 , -97.041089 2]	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.	Lacks 60" turning space with table at all 4 shelters	Relocate obstacles to create turning space in picnic shelters.	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		
7	FM 428 Access Point: FM 428 - Picnic Area	[33.3077209 , -97.041073 9]	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.	1.5" gap near shelter	Correct or fill gaps to be max .5".	2015 ABAAS Section: 302.3 2012 TAS Section: 302.3 2010 ADAS Section: 302.3		
8	FM 428 Access Point: FM 428 - Picnic Area	[33.30776, -97.04086]	The fishing line disposal station and maps are 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.	Fishing line disposal station and maps too high at 57"	Remount operable parts to be in reach range of 15" min to 48" max.	2015 ABAAS Section: 308.1 2012 TAS Section: 308.1 2010 ADAS Section: 308.1		




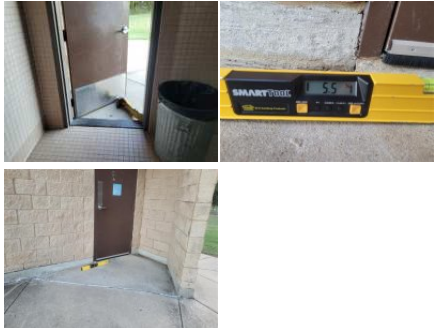
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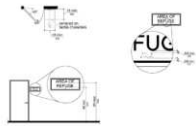

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
9	FM 428 Access Point: FM 428 - Picnic Area	[33.3075857, -97.0408854]	There is a gap spaced greater than a 1/2 inch. Openings in floor or ground surfaces shall not allow passage of a sphere more than 1/2 inch diameter. Elongated openings shall be placed so that the long dimension is perpendicular to the dominant direction of travel.	1.25" gap near men's restroom	Correct or fill gaps to be max .5".	2015 ABAAS Section: 302.3 2012 TAS Section: 302.3 2010 ADAS Section: 302.3		
10	FM 428 Access Point: FM 428 - Canoe Launch	[33.30822, -97.04071]	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.	Canoe launch lacks route, sand/mud has built up onto stairs, stairs steep, ramped area before stairs has 19.1% slope	Provide a compliant ramp having max slopes of 8.33% for access to canoe launch.	2010 ADAS Section: 206.2.2, 206.2		

Ray Roberts Lake State Park - Greenbelt Unit - 100 P W 4137 Pilot Point, TX 76258

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
11	FM 428 Access Point: FM 428 - Trailhead	[33.3074609 , -97.041437]	Obstacles on outdoor recreation access routes, passing spaces, and resting intervals shall not exceed 1/2 inch (13 mm) in height measured vertically to the highest point. EXCEPTION: Where the surface is other than asphalt, concrete, or boards, obstacles shall be permitted to not exceed 1 inch (25 mm) in height measured vertically to the highest point.	1" change in level (CIL) near accessible picnic area, 2" and 1.25" at picnic area closest to road	Repair, bevel or ramp CIL along the ORAR to max .5" or 1" for surfaces other than concrete, asphalt or boards as a smart practice.	2015 ABAAS Section: 1016.5, 1016.5 EXCEPTION		
12	FM 428 Access Point: FM 428 - Trailhead	[33.3077292 , -97.0408786]	Element meets all standards and requirements	Bike rack, fee box, garbage can, and kiosk sign comply	None	2010 ADAS Section: N/A		
13	FM 428 Access Point: FM 428 - Trailhead	[33.3069191 , -97.0422236]	Element meets all standards and requirements	Historic bridge complies	None	2010 ADAS Section: N/A		
14	FM 428 Access Point: FM 428 - Scenic View	[33.2881409 , -97.0316411]	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 As a smart practice, add at least one armrest and achieve height of bench seat of 17" to 19"	Bench lacks clear ground space (CGS)	Construct firm, stable, and slip resistant pads at least 36" by 48" adjacent to 20% of benches, and locate along a route as a smart practice.	2015 ABAAS Section: 1011.2.1		


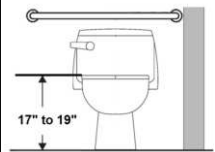


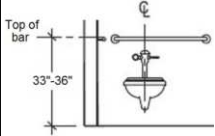
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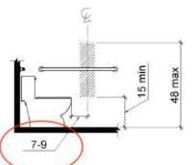

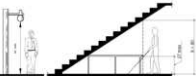
Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
15	FM 428 Access Point: FM 428 - Scenic View	[33.28791, -97.03162]	The surface of trails, passing spaces, and resting intervals shall be firm and stable	Scenic overlook trail very rocky, dirt surface	Replace surface of trail with one that is firm and stable as a smart practice.	2015 ABAAS Section: 1017.2		
16	FM 428 Access Point: FM 428 - Equestrian	[33.3083498, -97.0402574]	At least one accessible route shall connect accessible buildings, accessible facilities, accessible elements, and accessible spaces that are on the same site. For areas of sport activity, an accessible route is required to connect to the boundary of each area of sport activity. The size of an area of sport activity includes only the space needed to play. Where multiple sports fields or courts are provided, an accessible route is required to each field or area of sport activity.	Lacks accessible route to equestrian trail, picnic areas, horse posts	Provide an accessible route to each element within the site.	2010 ADAS Section: 206.2.2, 206.2		
17	FM 428 Access Point: FM 428 - Equestrian	[33.3082141, -97.0398548]	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 F245.2	0 of 4 picnic areas comply	Create access to 20% of the shelters or picnic areas at the site as a smart practice.	2015 ABAAS Section: F245.2.2		
18	FM 428 Access Point: FM 428 - Men's Restroom	[33.3076483, -97.0408969]	Minimum maneuvering clearances at doors and gates shall comply with 404.2.4. Maneuvering clearances shall extend the full width of the doorway and the required latch side or hinge side clearance. Maneuvering clearances shall have a max slope of 2.08%.	men's restroom - garbage can push side, 5.5% slope	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, correct slope in door clearance to max 2.08%.	2010 ADAS Section: 404.2.3, 404.2.7, 404.2.4, 404.2.11, 404.2.11 Exception		



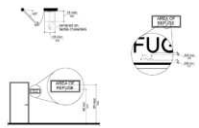

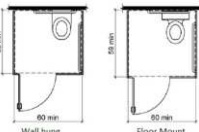
Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
19	FM 428 Access Point: FM 428 - Men's Restroom	[33.3076326 , -97.040941 2]	The restroom sign does not comply with one or more applicable requirements for the location, height, and properties of the sign.	sign mounted on door	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		
20	FM 428 Access Point: FM 428 - Men's Restroom	[33.3076259 , -97.040938 5]	The self closing faucet controls do not stay open for a minimum of 10 seconds. Faucet controls and operating mechanisms shall be operable with one hand and shall not require tight grasping, pinching or twisting of the wrist. The force required to activate controls shall be no greater than 5 lb. Lever-operated, push-type and electronically controlled mechanisms are examples of acceptable designs. Self-closing valves are allowed if the faucet remains open for at least 10 seconds.	faucets turn off quickly	Adjust timing of sink faucets to remain on for min. 10 seconds.	2015 ABAAS Section: 606.4 2012 TAS Section: 606.4 2010 ADAS Section: 606.4		
21	FM 428 Access Point: FM 428 - Men's Restroom	[33.3076259 , -97.040935 8]	The urinal is located in an area that does not provide the required clear floor space for a front approach. The surrounding elements of a urinal must provide a minimum of 30 by 48 inches of clear floor space for a front approach.	28.5" wide access to accessible urinal	Relocate or remove privacy wall at urinal to provide 30" CFS	2015 ABAAS Section: 605.2 2012 TAS Section: 605.2 2010 ADAS Section: 605.2		


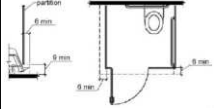

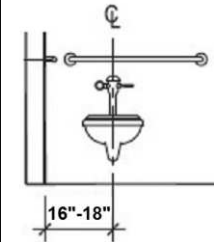

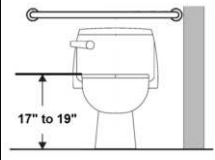
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Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
22	FM 428 Access Point: FM 428 - Men's Restroom	[33.3076281 , -97.0409398]	The dimensions of the toilet stall do not comply. Wheelchair accessible compartments shall be 60 inches wide and 59 inches deep minimum for floor mounted water closets measured perpendicular to the rear wall. Door shall not swing into the minimum clear floor space required for the toilet.	stall 54.5" deep	Widen accessible stalls to min. 60" clear width, 59" depth	2015 ABAAS Section: 604.8.1.1 2012 TAS Section: 604.3.2 2010 ADAS Section: 604.3.2		
23	FM 428 Access Point: FM 428 - Men's Restroom	[33.3076169 , -97.0409412]	The accessible toilet compartment does not provide proper toe clearance on the front and/or side partition. The front partition and at least one side partition shall provide a toe clearance of 9 inches minimum above the finish floor and 6 inches deep minimum beyond the compartment-side face of the partition, exclusive of partition support members. Toe clearance at the side partition is not required in a compartment greater than 66 inches wide. Toe clearance at the front partition is not required where the depth is minimum 62 inches for a wall hung toilet and minimum 65 inches for a floor mounted toilet.	full height partitions, stall lacks toe clearance	Provide toe clearance at the front and side partitions, or enlarge stall to provide the same.	2015 ABAAS Section: 604.8.1.4 2012 TAS Section: 604.8.1.4 2010 ADAS Section: 604.8.1.4		
24	FM 428 Access Point: FM 428 - Men's Restroom	[33.3076259 , -97.0409358]	The toilet is not located within the range allowed from the side wall or partition. The centerline of the toilet must be 16 to 18 inches from the side wall.	toilet centerline 18.5"	Remount toilets to 16" to 18" from the side wall to centerline.	2015 ABAAS Section: 604.2 2012 TAS Section: 604.2 2010 ADAS Section: 604.2		



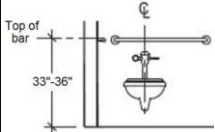

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
25	FM 428 Access Point: FM 428 - Men's Restroom	[33.307627, -97.040938 5]	The toilet seat is not located within the range allowed off the floor. The height of accessible water closets shall be a minimum of 17 inches and a maximum of 19 inches measured to the top of a maximum 2-inch high toilet seat.	seat height 19.75"	Replace toilet seat, or re-set or replace toilet to 17" to 19" above the finished floor (AFF).	2015 ABAAS Section: 604.4 2012 TAS Section: 604.4 2010 ADAS Section: 604.4		
26	FM 428 Access Point: FM 428 - Men's Restroom	[33.3076304, -97.040925 1]	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 bar extends to 50"	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		
27	FM 428 Access Point: FM 428 - Men's Restroom	[33.3076214, -97.040938 5]	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 9" 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		

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
28	FM 428 Access Point: FM 428 - Men's Restroom	[33.3076236 , -97.040927 8]	The stall door fails to comply with all of the door requirements. The stall door must be a minimum of 32" wide and have compliant hardware on both sides. The stall door must be self-closing.	stall door not self-closing	Adjust stall door to be self-closing.	2015 ABAAS Section: 404.2.3, 404.2.7, 604.8.2.2 2012 TAS Section: 404.2.3, 404.2.7, 604.8.2.2 2010 ADAS Section: 404.2.3, 404.2.7, 604.8.2.2		
29	FM 428 Access Point: FM 428 - Men's Restroom	[33.3076035 , -97.040927 8]	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 located on back wall	Remount toilet paper dispenser max 7" to 9" from front of toilet, 15" to 48" aff and min 12" above or 1.5" below grab bar.	2015 ABAAS Section: 604.7 2012 TAS Section: 604.7 2010 ADAS Section: 604.7		
30	FM 428 Access Point: FM 428 - Men's Restroom	[33.3076293 , -97.040937 1]	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.	hand dryer protrudes 9"	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		


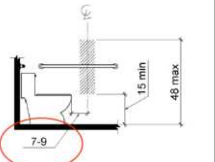

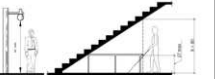

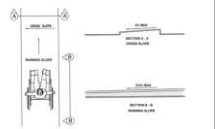
Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
31	FM 428 Access Point: FM 428 - Women's Restroom	[33.3076136 , -97.040927 1]	Minimum maneuvering clearances at doors and gates shall comply with 404.2.4. Maneuvering clearances shall extend the full width of the doorway and the required latch side or hinge side clearance. Maneuvering clearances shall have a max slope of 2.08%. The threshold has a vertical change greater than 1/4 inch high.	women's restroom - 1" change in level (CIL), garbage can push side	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".	2010 ADAS Section: 404.2.3, 404.2.7, 404.2.4, 404.2.11, 404.2.11 Exception		
32	FM 428 Access Point: FM 428 - Women's Restroom	[33.3076281 , -97.040930 4]	The restroom sign does not comply with one or more applicable requirements for the location, height, and properties of the sign.	sign mounted on door, faded	Acquire and mount signage, including Braille, raised lettering and access symbol mounted on wall, latch side of door, 48" to baseline of lowest character and 60" to baseline of highest character.	2015 ABAAS Section: F216.2, 703.1, 703.2, 703.5, 703.6 2012 TAS Section: 216.2, 703.1, 703.2, 703.5, 703.6 2010 ADAS Section: 216.2, 703.1, 703.2, 703.5, 703.6		
33	FM 428 Access Point: FM 428 - Women's Restroom	[33.307627, -97.040930 4]	The dimensions of the toilet stall do not comply. Wheelchair accessible compartments shall be 60 inches wide and 59 inches deep minimum for floor mounted water closets measured perpendicular to the rear wall. Door shall not swing into the minimum clear floor space required for the toilet.	stall 54.5" deep	Widen accessible stalls to min. 60" clear width, 59" depth	2015 ABAAS Section: 604.8.1.1 2012 TAS Section: 604.3.2 2010 ADAS Section: 604.3.2		

Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
34	FM 428 Access Point: FM 428 - Women's Restroom	[33.3076169 , -97.040933 1]	The accessible toilet compartment does not provide proper toe clearance on the front and/or side partition. The front partition and at least one side partition shall provide a toe clearance of 9 inches minimum above the finish floor and 6 inches deep minimum beyond the compartment-side face of the partition, exclusive of partition support members. Toe clearance at the side partition is not required in a compartment greater than 66 inches wide. Toe clearance at the front partition is not required where the depth is minimum 62 inches for a wall hung toilet and minimum 65 inches for a floor mounted toilet.	full height partitions, stall lacks toe clearance	Provide toe clearance at the front and side partitions, or enlarge stall to provide the same	2015 ABAAS Section: 604.8.1.4 2012 TAS Section: 604.8.1.4 2010 ADAS Section: 604.8.1.4		
35	FM 428 Access Point: FM 428 - Women's Restroom	[33.3076349 , -97.040938 5]	The toilet is not located within the range allowed from the side wall or partition. The centerline of the toilet must be 16 to 18 inches from the side wall.	toilet centerline 18.75"	Remount toilets to 16" to 18" from the side wall to centerline.	2015 ABAAS Section: 604.2 2012 TAS Section: 604.2 2010 ADAS Section: 604.2		
36	FM 428 Access Point: FM 428 - Women's Restroom	[33.3076315 , -97.040942 5]	The toilet seat is not located within the range allowed off the floor. The height of accessible water closets shall be a minimum of 17 inches and a maximum of 19 inches measured to the top of a maximum 2-inch high toilet seat.	seat height 19.5"	Replace toilet seat, or re-set or replace toilet to 17" to 19" above the finished floor (AFF).	2015 ABAAS Section: 604.4 2012 TAS Section: 604.4 2010 ADAS Section: 604.4		




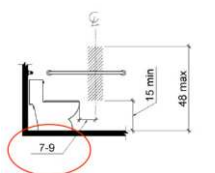

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Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
37	FM 428 Access Point: FM 428 - Women's Restroom	[33.3076416 , -97.040935 8]	The side grab bars are not in the correct location. Grab bars on the side 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 bar extends 49.5"	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		
38	FM 428 Access Point: FM 428 - Women's Restroom	[33.3076192 , -97.040939 8]	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 9" 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		
39	FM 428 Access Point: FM 428 - Women's Restroom	[33.3076124 , -97.040946 5]	The stall door fails to comply with all of the door requirements. The stall door must be a minimum of 32" wide and have compliant hardware on both sides. The stall door must be self-closing.	stall door not self closing	Adjust stall door to be self-closing.	2015 ABAAS Section: 404.2.3, 404.2.7, 604.8.2.2 2012 TAS Section: 404.2.3, 404.2.7, 604.8.2.2 2010 ADAS Section: 404.2.3, 404.2.7, 604.8.2.2		


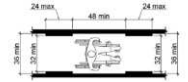

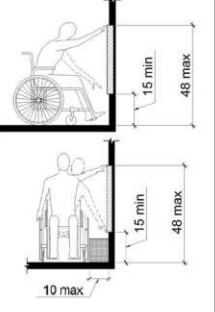

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Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
40	FM 428 Access Point: FM 428 - Women's Restroom	[33.3076236 , -97.040938 5]	The toilet paper is not installed within the compliant range in front of the 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 located on rear wall	Remount toilet paper dispenser max 7" to 9" from front of toilet, 15" to 48" aff and min 12" above or 1.5" below grab bar.	2015 ABAAS Section: 604.7 2012 TAS Section: 604.7 2010 ADAS Section: 604.7		
41	FM 428 Access Point: FM 428 - Women's Restroom	[33.3076281 , -97.040938 5]	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.	hand dryer protrudes 8"	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		
42	FM 428 Access Point: FM 428 - Women's Restroom	[33.3076349 , -97.040941 2]	The accessible route contains running slopes greater than 5 percent and cross slopes greater than 2 percent across the width of the walk and has not been constructed as a ramp (i.e. handrails, wheel guides, etc.). When the slope in the direction of travel of any walk exceeds 1 unit vertical in 20 units horizontal (5-percent slope), it must be constructed as ramp. Surface cross slopes must not exceed one unit vertical in 48 units. Horizontal (2-percent slope).	3.3% slope to stalls	Correct or repair slope to max 2.08% in restroom.	2015 ABAAS Section: 403.3 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
43	US 380 Access Point: US 380 - Parking	[33.2401632 , -97.041538 5]	The area is subject to regular closure. Amenities in this area should not be the only accessible features of any type at this site.	380 access frequently closed due to flooding	Focus corrective work for accessibility of duplicated amenities at other locations in the Greenbelt Unit that are not frequently closed.	Capture Section: 1		
44	US 380 Access Point: US 380 - Parking	[33.2402161 , -97.041547 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 100 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 number of accessible stalls - approximately 100 standard, 3 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		
45	US 380 Access Point: US 380 - Restroom	[33.2405122 , -97.041613 6]	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 too far from front of toilet in both restrooms	Remount toilet paper dispenser max 7" to 9" from front of toilet, 15" to 48" AFF and min 12" above or 1.5" below grab bar.	2015 ABAAS Section: 604.7 2012 TAS Section: 604.7 2010 ADAS Section: 604.7		
46	US 380 Access Point: US 380 - Restroom	[33.240524, -97.041614 8]	Where vertical grab bars are provided, they must be a minimum 18" bar and mounted between 39" and 41" from the rear wall. The bottom of the bar must be mounted 39" to 41" above the floor.	vertical bar 38.5" from rear wall in left restroom	Remount vertical grab bar to 39" to 41" aff and 39" to 41" from rear wall	Capture Section: 1		
47	US 380 Access Point: US 380 - Restroom	[33.2405297 , -97.041615 8]	Element meets all standards and requirements	Restroom doors comply	None	2010 ADAS Section: N/A		

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Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
48	US 380 Access Point: US 380 - Picnic Area	[33.24007, -97.0416]	All of the picnic units do not provide mobility features. Where picnic facilities contain two or fewer picnic units, each picnic unit shall provide mobility features.	unable to locate picnic area	Make corrections to picnic areas in this section of the site as a smart practice; in the alternative, leave as is and designate picnic areas at other locations within this site as accessible.	2015 ABAAS Section: F245.2.1		
49	US 380 Access Point: US 380 - Canoe Launch	[33.24028, -97.04198]	The walking surface is obstructed. A 36 inch minimum clear walking surface is required.	unable to access canoe launch due to flood damage, stairs are provided but cannot be measured at this time	If only stairs provided, create a ramp or other accessible route to access canoe launch. Maintain accessible routes to be free of debris when this portion of the park is open.	2015 ABAAS Section: 403.5.1 2012 TAS Section: 403.5.1 2010 ADAS Section: 403.5.1		
50	US 380 Access Point: US 380 - Trailhead	[33.2404315, -97.0417312]	The maps are 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.	Maps exceed reach range	Remount map display to be in reach range of 15" min to 48" max.	2015 ABAAS Section: 308.1 2012 TAS Section: 308.1 2010 ADAS Section: 308.1		
51	US 380 Access Point: US 380 - Trailhead	[33.2404565, -97.0416688]	Element meets all standards and requirements	Park map sign and self pay kiosk comply	None	2010 ADAS Section: N/A		

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Finding Number	Area Description	Lat/Long	Finding	As Built	Recommendation	Citation	Photos	Figure
52	US 380 Access Point: US 380 - Trailhead	[33.24074, -97.04169]	The surface of trails, passing spaces, and resting intervals shall be firm and stable	Trail lacks firm and stable surface - dirt and gravel surface	Replace surface of trail with one that is firm and stable as a smart practice.	2015 ABAAS Section: 1017.2	