Table of Contents

Abbreviations ........................................................................................................................................... iii

1.0 Introduction ........................................................................................................................................... 1
  1.1 Purpose .................................................................................................................................................. 1
  1.2 Legislative Mandate ............................................................................................................................... 1
  1.3 ADA Self-Evaluation and Transition Plan Development Requirements and Process ............... 1
  1.4 Discrimination and Accessibility ......................................................................................................... 2
    1.4.1 Physical Barriers ............................................................................................................................. 2
    1.4.2 Programmatic Barriers .................................................................................................................... 2
    1.4.3 Ongoing Accessibility Improvements ............................................................................................. 2
    1.4.4 City of Boerne Approach ............................................................................................................... 2
    1.4.5 Exceptions and Exemptions ............................................................................................................ 3
  1.5 New Construction and Alterations ....................................................................................................... 4
  1.6 Maintenance Versus Alterations .......................................................................................................... 5
  1.7 FHWA Guidance on Closing Pedestrian Crossings .......................................................................... 6
  1.8 Existing City Programs that Implement ADA Upgrades ................................................................. 7

2.0 Public Outreach .................................................................................................................................... 9
  2.1 Web Map ............................................................................................................................................. 9

3.0 Self-Evaluation and Summary of Findings ......................................................................................... 11
  3.1 Programs, Services, and Activities Overview and Administrative Requirements .................. 11
    3.1.1 ADA/504 Coordinator (Title I / Title II) ....................................................................................... 12
    3.1.2 Roles and Responsibilities of the ADA/504 Coordinator ............................................................... 12
    3.1.3 ADA Grievance Policy, Procedure, and Form with Appeal Process for the ADA .................. 13
    3.1.4 Public Notice Under the ADA ....................................................................................................... 13
    3.1.5 ADA Liaison Committee ............................................................................................................... 13
  3.2 Program, Services, and Activities Inventory and Self-Evaluation ................................................. 13
  3.3 Facility Evaluation Action Plan .......................................................................................................... 14
  3.4 Existing Facility Inventory ................................................................................................................... 14
    3.4.1 Buildings ......................................................................................................................................... 15
    3.4.2 Parks and Trails ............................................................................................................................... 15
    3.4.3 Signalized Intersections .................................................................................................................. 16
    3.4.4 Sidewalk Corridors ......................................................................................................................... 16
    3.4.5 Facility Inventory Summary .......................................................................................................... 17
  3.5 City of Boerne Facility Evaluation Action Plan ............................................................................... 17
  3.6 Schedule and Implementation Methods .............................................................................................. 18
  3.7 Prioritization ......................................................................................................................................... 19
    3.7.1 Prioritization Factors for Facilities ................................................................................................. 20
  3.8 Facilities Review .................................................................................................................................. 24
    3.8.1 Buildings ......................................................................................................................................... 24
    3.8.2 Parks ................................................................................................................................................ 24
    3.8.3 Paved Trails ..................................................................................................................................... 25
    3.8.4 Signalized Intersections ................................................................................................................. 25
    3.8.5 Sidewalk Corridors ......................................................................................................................... 28
3.9 Conclusion ........................................................................................................... 32

4.0 Facility Costs ........................................................................................................ 33
  4.1 Facilities Cost Projection Overview ................................................................. 33
  4.2 Implementation Schedule .................................................................................. 33
  4.3 Funding Opportunities ....................................................................................... 34
    4.3.1 Federal and State Funding........................................................................... 34
    4.3.2 Local Funding ............................................................................................. 35
    4.3.3 Private Funding .......................................................................................... 35

5.0 Conclusion and Next Steps .................................................................................. 37

Appendix ................................................................................................................... 39
  Appendix A: Public Outreach
  Appendix B: Grievance Procedure and Public Notice
    City of Boerne Title II Grievance Procedure
    City of Boerne Title II Grievance Form
    Public Notice Under the ADA
  Appendix C: Federal Highway Administration ADA Transition Plans Memo
  Appendix D: Facility Inventory Map
  Appendix E: Evaluated Facility Maps
  Appendix F: Facility Reports
  Appendix G: ADA Action Log
  Appendix H: Federal and State Funding Opportunities

List of Tables
  Table 1. Summary of Buildings to be Reviewed ....................................................... 15
  Table 2. Summary of Parks and Trails to be Reviewed ............................................ 16
  Table 3. Prioritization Factors for Buildings/Parks/Trails ...................................... 21
  Table 4. Prioritization Factors for Signalized and Unsignalized Intersections .......... 22
  Table 5. Prioritization Factors for Sidewalk Corridors .......................................... 23
  Table 6. Summary of Buildings Reviewed ............................................................. 24
  Table 7. Summary of Parks Reviewed ................................................................. 24
  Table 8. Summary of Curb Ramp Issues at Signalized Intersections ..................... 26
  Table 9. Summary of Push Button Issues ............................................................. 27
  Table 10. Prioritization Summary Signalized Intersections .................................... 27
  Table 11. Summary of Curb Ramp Issues at Unsignalized Intersections ............... 30
  Table 12. Prioritization Summary for Sidewalk Corridors .................................... 31
  Table 13. Prioritization Summary for Unsignalized Intersections ......................... 31
  Table 14. Summary of Facility Costs ................................................................... 33
  Table 15. Implementation Schedule .................................................................... 34
List of Figures

Figure 1. Maintenance versus Alteration Projects

Abbreviations

ADA – Americans with Disabilities Act
ADAAG – Americans with Disabilities Act Accessibility Guidelines
CDBG – Community Development Block Grant
CFR – Code of Federal Regulations
CID – Community Improvement District
CIP – Capital Improvement Projects
DOJ – United States Department of Justice
FHWA – Federal Highway Administration
GIS – Geographic Information System
MUTCD – Manual on Uniform Traffic Control Devices
PROWAG – Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way
PSA – Programs, Services, and Activities
RAS – Registered Accessibility Specialist
TAC – Texas Administrative Code
TAD – Tax Allocation District
TAP – Transportation Alternatives Program
TDLR – Texas Department of Licensing and Regulation
TIF – Tax Increment Financing District
TMUTCD – Texas Manual on Uniform Traffic Control Devices
TxDOT – Texas Department of Transportation
1.0 Introduction

1.1 Purpose
The purpose of this Americans with Disabilities Act (ADA) Self-Evaluation and Transition Plan is to summarize the activities completed to-date related to ADA compliance and to create a roadmap for the City of Boerne to update their ADA Transition Plan. Prioritization methodology for evaluating and implementing improvements was developed based on the applicable 2010 ADA Standards, 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG), and the details are provided in this document.

This document includes an overview of the ADA and provides recommendations for the City of Boerne based on guidance from the Federal Highway Administration (FHWA) and U.S. Department of Justice (DOJ) to improve accessibility for the public.

1.2 Legislative Mandate
The Americans with Disabilities Act is a civil rights law that mandates equal opportunity for individuals with disabilities. The ADA prohibits discrimination in access to jobs, public accommodations, government services, public transportation, and telecommunications. Title II of the ADA also requires that all programs, services, and activities (PSAs) of public entities provide equal access for individuals with disabilities.

The City of Boerne will undertake a comprehensive evaluation of its PSAs to determine the extent that individuals with disabilities may be restricted in their access.

1.3 ADA Self-Evaluation and Transition Plan Development Requirements and Process
The City of Boerne is obligated to observe all requirements of Title I in its employment practices; Title II in its policies, programs, and services; any parts of Titles IV and V that apply to the City and its programs, services, or facilities; and all requirements specified in the 2010 ADA Standards and 2011 PROWAG that apply to facilities and other physical holdings.

Title II has the broadest impact on the City. Included in Title II are administrative requirements for all government entities employing more than 50 people. These administrative requirements are:

- Completion of a Self-Evaluation;
- Development of an ADA complaint procedure;
- Designation of at least one (1) person who is responsible for overseeing Title II compliance; and
- Development of a Transition Plan to schedule the removal of the barriers uncovered by the Self-Evaluation process. The Transition Plan will become a working document until all barriers have been addressed.

This document describes the process developed to complete the evaluation of the City of Boerne’s PSAs and facilities, provides possible solutions to remove programmatic barriers, and presents a Transition Plan for the modification of facilities and public rights-of-way to improve accessibility, which will guide the planning and implementation of necessary program and facility modifications over the next several years. The ADA Self-Evaluation and Transition Plan is significant in that it establishes the City’s ongoing commitment to the development and maintenance of PSAs and facilities that accommodate all its citizenry.
1.4 Discrimination and Accessibility

Program accessibility means that, when viewed in its entirety, each program is readily accessible to and usable by individuals with disabilities. Program accessibility is necessary not only for individuals with mobility needs, but also to individuals with sensory and cognitive disabilities.

Accessibility applies to all aspects of a program or service, including but not limited to physical access, advertisement, orientation, eligibility, participation, testing or evaluation, provision of auxiliary aids, transportation, policies, and communication.

The following are examples of elements that should be evaluated for barriers to accessibility:

1.4.1 Physical Barriers
- Parking
- Path of travel to, throughout, and between buildings and amenities
- Doors
- Service counters
- Restrooms
- Drinking fountains
- Public telephones
- Path of travel along sidewalk corridors within the public rights-of-way
- Access to pedestrian equipment at signalized intersections

1.4.2 Programmatic Barriers
- Building signage
- Customer communication and interaction
- Non-compliant sidewalks or curb ramps
- Emergency notifications, alarms, and visible signals
- Participation opportunities for City sponsored events

1.4.3 Ongoing Accessibility Improvements
City PSAs and facilities evaluated during the Self-Evaluation will continue to be evaluated on an ongoing basis, and the ADA Transition Plan will be revised to account for changes that have been or will be completed since the initial Self-Evaluation. This Plan will be posted on the City's website for review and consideration by the public.

1.4.4 City of Boerne Approach
The purpose of the Transition Plan is to provide the framework for achieving equal access to the City of Boerne’s programs, services, and activities within a reasonable timeframe. The City's elected officials and staff believe that accommodating persons with disabilities is essential to good customer service, ensures the quality-of-life Boerne residents seek to enjoy, and guides future improvements.

The City of Boerne should make reasonable modifications in PSAs when the modifications are necessary to avoid discrimination based on disability, unless the City can demonstrate that making the modifications will fundamentally alter the nature of the program, service, or activity. The City of Boerne will not place surcharges on individuals with disabilities to cover the cost involved in making PSAs accessible.
1.4.5 Exceptions and Exemptions

A municipality is not required to take any action that would create any undue financial or administrative burden for the public entity, create a hazardous condition for other people, or threaten or destroy the historic significance of a historic property.

In determining whether an alteration would impose an undue financial or administrative burden on a covered entity, factors to be considered include: (i) the nature and cost of the alteration needed; (ii) the overall financial resources of the facility or facilities involved in the provision of the reasonable accommodation; the number of persons employed at such facility; the effect on expenses and resources, or the impact otherwise of such accommodation upon the operation of the facility; (iii) the overall financial resources of the covered entity; the overall size of the business of a covered entity with respect to the number of its employees; the number, type, and location of its facilities; and (iv) the type of operation or operations of the covered entity, including the composition, structure, and functions of the workforce of such entity; the geographic separateness, administrative, or fiscal relationship of the facility or facilities in question to the covered entity.

In determining whether an alteration would threaten or destroy the historic significance of a historic property, the City should first confirm if the property is on the National Register of Historic Places. Based on a search of the National Register of Historic Places NPGallery Database (https://npgallery.nps.gov/nrhp) and the associated geodatabase (https://irma.nps.gov/DataStore/Reference/Profile/2210280), there is one (1) historic site/district within the City. Additionally, City staff has identified four (4) historic properties. The 5 historic sites within the City include:

- Dienger, Joseph, Building
- Herff-Rozelle Farm
- Kendall County Courthouse and Jail
- Kendall Inn
- Voelcker-Sueltenfuss House

The City has established the Historic Landmark Commission. The Historic Landmark Commission holds a variety of responsibilities with the goal of promoting historical preservation in the city. The Commission and its members:

- Investigate and study matters related to the protection, enhancement, restoration, perpetuation and use of historic landmarks, districts and structures;
- Review applications for historic landmark designation;
- Review permits for the construction, reconstruction, alteration, restoration, relocation, demolition, or razing of an included structure in a designated historic district or affecting a designated historic landmark;
- Review applications for historic preservation tax exemptions; and
- Make recommendations to the Planning and Zoning Commission pertaining to the amendment of any historic district.

The Historic Advisory Board should take the ADA into consideration when providing recommendations to ensure the current standards are being met when facilities are altered.

A municipality is not necessarily required to make each of its existing facilities accessible to and usable by individuals with disabilities. In the event the City determines a proposed action would generate undue financial or administrative burden, create a hazardous condition for other people, or threaten or destroy the historic significance of a historic property, a municipality has a responsibility to communicate and document the decision and the methodology used to reach it. If an action would result in such an alteration or such burdens, a municipality shall take any other actions that would not result in such an alteration or such burdens but would nevertheless ensure that individuals with disabilities receive the benefits or services provided by the City.
1.5 New Construction and Alterations

If the start date for construction is on or after March 15, 2012, all newly constructed or altered state and local government facilities must comply with the 2010 ADA Standards for Accessible Design. Before that date, the 1991 Standards (without the elevator exemption), the Uniform Federal Accessibility Guidelines, or the 2010 ADA Standards may be used for such projects when the start of construction commences on or after September 15, 2010.

The most recent standard is the 2010 ADA Standards for Accessible Design, which sets the minimum requirements – both scoping and technical – for newly designed and constructed or altered state and local government facilities, public accommodations, and commercial facilities to be readily accessible to and usable by individuals with disabilities. It is effectuated from 28 Code of Federal Regulations (CFR) 35.151 and the 2004 Americans with Disabilities Act Accessibility Guidelines (ADAAG). However, the FHWA and DOJ recommend using PROWAG for designing facilities within the public rights-of-way as a best practice until it is adopted at the federal level. Additionally, the Texas Department of Transportation (TxDOT) has adopted PROWAG and incorporated the guidelines into design standards for pedestrian facilities. The Manual on Uniform Traffic Control Devices (MUTCD) is also incorporated by reference within PROWAG. It is recommended that the City of Boerne adopt PROWAG so that it becomes an enforceable document for all City projects within the public rights-of-way, regardless of its adoption status at the state and federal level.

2010 ADA Standards for Accessible Design

The Department of Justice’s revised regulations for Titles II and III of the Americans with Disabilities Act of 1990 were published in the Federal Register on September 15, 2010. These regulations adopted revised, enforceable accessibility standards called the 2010 ADA Standards for Accessible Design, “2010 Standards.” On March 15, 2012, compliance with the 2010 Standards was required for new construction and alterations under Titles II and III. March 15, 2012 is also the compliance date for using the 2010 Standards for program accessibility and barrier removal.

PROWAG

The U.S. Access Board is developing new guidelines for public rights-of-way that will address various issues, including access for blind pedestrians at street crossings, wheelchair access to on-street parking, and various constraints posed by space limitations, roadway design practices, slope, and terrain. The new guidelines will cover pedestrian access to sidewalks and streets, including crosswalks, curb ramps, street furnishings, pedestrian signals, parking, and other components of public rights-of-way. The Board’s aim in developing these guidelines is to ensure that access for persons with disabilities is provided wherever a pedestrian way is newly built or altered, and that the same degree of convenience, connection, and safety afforded the public generally is available to pedestrians with disabilities. Once these guidelines are adopted by the Department of Justice, they will become enforceable standards under Title II of the ADA. However, in a memorandum date January 23, 2006 from the Federal Highway Administration, the draft PROWAG is the recommended best practice and can be considered the state of the practice that could be followed for areas not fully addressed by the 2010 ADA Standards for Accessible Design.

In the state of Texas, the Texas Administrative Code (TAC) Chapter 68 (Elimination of Architectural Barriers), Rule §68.102 (Public Right-of-Ways Projects) references compliance with the latest version of PROWAG for elimination of barriers for public rights-of-way projects. The Texas Department of Licensing and Regulation (TDLR) adopted Rule §68.102, effective May 15, 2017. The applicable section of the rule states:

(a) For public right-of-way projects, in addition to accepting compliance with applicable TAS requirements, the department will also accept compliance with the Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way, published by the Architectural

**MUTCD**
Traffic control devices shall be defined as all signs, signals, markings, and other devices used to regulate, warn, or guide traffic, placed on, over, or adjacent to a street, highway, pedestrian facility, bikeway, or private road open to public travel by authority of a public agency or official having jurisdiction, or, in the case of a private road, by authority of the private owner or private official having jurisdiction. The Manual on Uniform Traffic Control Devices is incorporated by reference in 23 CFR, Part 655, Subpart F and shall be recognized as the national standard for all traffic control devices installed on any street, highway, bikeway, or private road open to public travel in accordance with 23 U.S.C. 109(d) and 402(a). The policies and procedures of the FHWA to obtain basic uniformity of traffic control devices shall be as described in 23 CFR 655, Subpart F.

It should be noted that the Texas Manual on Uniform Traffic Control Devices (TMUTCD) is incorporated by reference in the TAC and shall be recognized as the Texas standard for all traffic control devices installed on any public street, highway, bikeway, or private road open to public travel.

### 1.6 Maintenance Versus Alterations
The United States DOJ has issued a briefing memorandum on clarification of maintenance versus alteration projects. Information contained in the briefing memorandum is below. This clarification regarding when curb ramp installation is required as part of a project can be used as a reference for City of Boerne staff who regularly are involved in maintenance and alteration projects.

The Americans with Disabilities Act of 1990 is a civil rights statute prohibiting discrimination against persons with disabilities in all aspects of life, including transportation, based on regulations promulgated by the United States DOJ. DOJ’s regulations require accessible planning, design, and construction to integrate people with disabilities into mainstream society. Further, these laws require that public entities responsible for operating and maintaining the public rights-of-way do not discriminate in their programs and activities against persons with disabilities. FHWA’s ADA program implements the DOJ regulations through delegated authority to ensure that pedestrians with disabilities have the opportunity to use the transportation system’s pedestrian facilities in an accessible and safe manner.

*FHWA and DOJ met in March 2012 and March 2013 to clarify guidance on the ADA’s requirements for constructing curb ramps on resurfacing projects. Projects deemed to be alterations must include curb ramps within the scope of the project.*

*This clarification provides a single Federal policy that identifies specific asphalt and concrete-pavement repair treatments that are considered to be alterations – requiring installation of curb ramps within the scope of the project – and those that are considered to be maintenance, which do not require curb ramps at the time of the improvement. Figure 1 provides a summary of the types of projects that fall within maintenance versus alterations.*

*This approach clearly identifies the types of structural treatments that both DOJ and FHWA agree require curb ramps (when there is a pedestrian walkway with a prepared surface for pedestrian use and a curb, elevation, or other barrier between the street and the walkway) and furthers the goal of the ADA to provide increased accessibility to the public right-of-way for persons with disabilities. This single Federal policy will provide for increased consistency and improved enforcement.*
An alteration that decreases or has the effect of decreasing the accessibility of a facility below the requirements for new construction at the time of the alteration is prohibited. For example, the removal of an existing curb ramp or sidewalk (without equivalent replacement) is prohibited. However, the FHWA has indicated a crossing may be closed if an engineering study (performed by the City and not included in the scope of this Transition Plan) determines the crossing is not safe for any user. The crossing should be closed by doing the following:

- A physical barrier is required to close a crossing at an intersection. FHWA has determined that a strip of grass between the sidewalk and the curb is acceptable as a physical barrier.
- A sign should be used to communicate the closure.

Agencies wishing to close certain intersection crossings should have a reasonable and consistent policy on when to do so written in their Transition Plan or as a standalone document. If safety concerns are established by an engineering study, a pedestrian crossing should not be accommodated for any user. The City of Boerne will only consider closing an existing pedestrian crossing if it is determined to be unsafe by an engineering study.
1.8 Existing City Programs that Implement ADA Upgrades

The City of Boerne currently implements ADA compliant designs through the following efforts:

- The City Street Maintenance Program encompasses curb, pavement, and sidewalk maintenance, all which improve the pedestrian path of travel in the public rights-of-way and help maintain accessible routes within the City of Boerne in an accessible condition.

- The City budget includes funds for annual sidewalk maintenance. These funds are used for fixing damaged sidewalk, trip hazards, curb ramps, and in-fill of sidewalk to complete an accessible route.

- The City’s Pavement Maintenance service includes pothole repairs that eliminate disruptions in the roadway surface. Additional services include preparation and repairs of paved surfaces where required throughout the City, including when these elements intersect the pedestrian path of travel.

- All City projects conform to the City design standards, which require compliance with PROWAG.

- The City follows state guidelines for all projects valued at $50K or more of pedestrian improvements. These projects are registered with the state and use a Registered Accessibility Specialist (RAS) to review plans and to perform a post construction inspection to verify the project meets all applicable accessibility requirements.

The City seeks out alternate funding mechanisms such as Safe Routes to Schools, the Community Development Block Grant (CDBG) Program, and the Transportation Alternatives Program (TAP) to fund improvements.
2.0 Public Outreach

As part of the City’s 2022 Mobility Master Plan project, the City created an interactive online map to receive feedback on any concerns related to accessibility.

2.1 Web Map

The City developed an online map to allow the public to identify specific locations where they experience issues related to accessibility, safety, connectivity, or suggestions for accessibility improvements that are needed in Boerne. The map was made available via the following link, and feedback was documented in April 2022.

Boerne Mobility Master Plan | Social Pinpoint (engagekh.com)

The web map or similar resources will continue to serve as tools to solicit feedback from the public on the Transition Plan. The input received through the web map is summarized in Appendix A.
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3.0 Self-Evaluation and Summary of Findings

The City of Boerne’s Americans with Disabilities Act Transition Plan will be regularly updated to include the results of reviews of the programs, services, and activities provided to employees and the public. The Plan will also be updated to include the findings from facility evaluations of all City-owned/maintained buildings and associated parking lots, parks and associated parking lots, park sidewalk and associated curb ramps, public rights-of-way sidewalks and associated curb ramps, and transit stops. It is anticipated that programs, services, activities, and facilities evaluations will be completed annual until all elements have been reviewed for ADA compliance.

3.1 Programs, Services, and Activities Overview and Administrative Requirements

Under the ADA, the City of Boerne is required to complete a Self-Evaluation of the City’s facilities, programs, policies, and practices. The Self-Evaluation identifies and provides possible solutions to those policies and practices that are inconsistent with Title II requirements. To be compliant, the Self-Evaluation should consider all the City’s programs, services, and activities, as well as the policies and practices the City uses to implement its various programs and services.

To comply with requirements of the plan, the City must take corrective measures to achieve program accessibility through several methods, including, but not limited to:

1. Relocation of programs to accessible facilities;
2. Modifications to existing programs so they are offered in an accessible manner;
3. Structural methods such as altering an existing facility;
4. Policy modifications to ensure nondiscrimination; and
5. Auxiliary aids needed to provide effective communication.

When choosing a method of providing program access, the City should attempt to give priority to the method that promotes inclusion among all users, including individuals with disabilities.

PSAs offered by the City to the public must be accessible. Accessibility applies to all aspects of a program, service, or activity, including advertisement, orientation, eligibility, participation, testing or evaluation, physical access, provision of auxiliary aids, transportation, policies, and communication.

However, the City does not have to take any action that will result in a fundamental alteration in the nature of a program or activity, create a hazardous condition for other people, or result in an undue financial and/or administrative burden. This determination should generally be made by the ADA/504 Coordinator and/or an authorized designee of the City, such as the City Manager or their designee, and must be accompanied by a written statement detailing the reasons for reaching the determination.

The determination of undue burden must be based on an evaluation of all resources available for use. If a barrier removal action is judged unduly burdensome, the City must consider all other options for providing access that will ensure that individuals with disabilities receive the benefits and services of the program or activity. This process must be fully documented.
3.1.1 ADA/504 Coordinator (Title I / Title II)

Under the ADA Title II, when a public entity has 50 or more employees based on an entity-wide employee total count, the entity is required to designate at least one (1) qualified responsible employee to coordinate compliance with ADA requirements. The name, office address, and telephone number of this individual must be available and advertised to employees and the public. This allows for someone to assist with questions and concerns regarding disability discrimination to be easily identified.

The City of Boerne has appointed Jeffrey Carroll, P.E. as ADA/504 Coordinator for Title I and Title II. Below is the ADA Coordinator’s contact information.

Jeffrey Carroll, P.E., ADA/504 Coordinator
Director of Development Services
Development Services
447 N. Main St
Boerne, TX 78006
Office: 830-248-1638
TX Relay: 7-1-1
jcarroll@boerne-tx.gov

The ADA/504 Coordinator contact information must be provided to interested parties. The following distribution methods should be considered:

- Post on the City website;
- Prominently display in common areas that are accessible to all employees and areas open to the public;
- Provide in materials that are distributed by the City for meetings and events where requests for auxiliary aids or services for effective communication might be needed; and
- Provide in materials that are distributed by the City where ADA questions or concerns may arise.

3.1.2 Roles and Responsibilities of the ADA/504 Coordinator

Below is a list of qualifications for ADA Coordinators that are recommended by U.S. Department of Justice:

- Familiarity with the entity’s structures, activities, and employees;
- Knowledge of the ADA and other laws addressing the rights of people with disabilities, such as Section 504 of the Rehabilitation Act;
- Experience with people with a broad range of disabilities;
- Knowledge of various alternative formats and alternative technologies that enable individuals with disabilities to communicate, participate, and perform tasks;
- Ability to work cooperatively with local entities and people with disabilities;
- Familiarity with any local disability advocacy groups or other disability groups;
- Skills and training in negotiation and mediation; and
- Organizational and analytical skills.

The responsibilities of the ADA/504 Coordinator include coordinating the City’s efforts to comply with Title II and investigating any complaints related to potential violations of Title II. The role of the ADA Coordinator typically includes being the primary contact when members of the public request an auxiliary aid or service for effective communication, such as a sign language interpreter or documents in Braille. An effective ADA Coordinator will be able to efficiently assist people with disabilities with their questions. These roles and responsibilities are
consistent with the Department of Justice’s guidance for “An Effective ADA Coordinator” (https://www.ada.gov/pcatoolkit/chap2toolkit.htm).

3.1.3 ADA Grievance Policy, Procedure, and Form with Appeal Process for the ADA

Local governments with 50 or more employees are required to adopt and publish procedures for resolving grievances in a prompt and fair manner that may arise under Title II of the ADA. The purpose of the ADA grievance procedure is to provide a mechanism for the resolution of discrimination issues at the City level, rather than require the complainant to resort to resolution at the federal level. The City of Boerne’s ADA grievance policies and procedures were developed in August 2022. The City of Boerne Title II ADA Grievance Policy, Procedure, and Form are available on the City’s website here: https://www.ci.boerne.tx.us/2470/ADA-Information

3.1.4 Public Notice Under the ADA

The ADA public notice requirement applies to all state and local governments covered by Title II, including entities with fewer than 50 employees. The target audience for the public notice includes applicants, beneficiaries, and other people interested in the entity’s PSAs. This notice is required to include information regarding Title II of the ADA and how it applies to the PSAs of the public entity. Publishing and publicizing the ADA notice is not a one-time requirement. State and local government entities should provide the information on an ongoing basis, whenever necessary. The Department of Justice suggests including brief statements about:

- Employment;
- Effective communication;
- Making reasonable modifications to policies and programs;
- Not placing surcharges on modifications or auxiliary aids and services; and
- Filing complaints.

The notice should also include the name and contact information of the ADA/504 Coordinator. State and local government entities should provide the information on an ongoing basis, whenever necessary or requested by the public. DOJ suggestions for ways to provide notice are provided at: https://www.ada.gov/pcatoolkit/chap2toolkit.htm.

Public Notice Under the ADA: Completed Actions

The City of Boerne Public Notice Under the ADA was developed in August 2022. A copy of the City’s Public Notice Under the ADA. Publicizing the ADA notice is not a one-time requirement, and the City will provide the information on an ongoing basis, whenever necessary or requested by the public. The City of Boerne ADA public notice will be posted on the City’s website here: https://www.ci.boerne.tx.us/2470/ADA-Information

3.1.5 ADA Liaison Committee

The ADA Liaison Committee is comprised of representatives from each City department. These individuals work closely with the ADA/504 Coordinator to resolve issues regarding the needs of their department and the programs under their management. The ADA/504 Coordinator works closely with the ADA Liaison Committee to coordinate the implementation of plans, programs, policies, and procedures. Each department representative is responsible for keeping a detailed log for all ADA inquiries within their department. This log will be shared with the ADA/504 Coordinator and should be retained for at least three (3) years.

3.2 Program, Services, and Activities Inventory and Self-Evaluation

The City of Boerne plans to compile a list of all City programs, services, and activities required to be reviewed for compliance with Title II of the ADA. The City will evaluate the current status regarding ADA requirements including
eligibility requirements, participation requirements, facilities used, staff training, tours, transportation, communication, notifications, public meetings, the use of contracted services, purchasing, maintenance of accessible features, and emergency procedures.

Updates to the City’s Transition Plan will be made to include findings and possible solutions for identified barriers as the inventory and Self-Evaluation of these PSAs are completed.

3.3 Facility Evaluation Action Plan

The Federal Highway Administration (FHWA) has provided guidance on the ADA Transition Plan process in their “INFORMATION: ADA Transition Plans” memo dated June 27, 2019 (see Appendix C). While this memo specifically addresses state departments of transportation, FHWA also recommends this guidance for local municipalities until municipality-specific guidance is developed by FHWA. Provided in the memo is a checklist for elements to be included in an ADA Transition Plan and other ADA requirements that agencies must fulfill.

Items included in the FHWA checklist related to the public rights-of-way are:

- **Inventory of Barriers** (identification of physical obstacles)
  - Identify intersection information, including curb ramps and other associated accessibility elements.
  - Require an Action Plan to develop an inventory of sidewalks (slopes, obstructions, protruding objects, changes in level, etc.), signals (including accessible pedestrian signals), bus stops (bus pads), buildings, parking, rest areas (tourist areas, picnic areas, visitor centers, etc.), mixed use trails, linkages to transit.
  - Discuss jurisdictional issues/responsibilities for sidewalks.

- **Schedule**
  - Show a strong commitment toward upgrading ADA elements identified in the inventory of barriers in the short-term (planned capital improvement projects).
  - Show a strong commitment over time toward prioritizing curb ramps at walkways serving entities covered by the ADA.
  - Schedule should include prioritization information, planning, and investments directed at eliminating other identified barriers over time.
  - Dedicate resources to eliminate identified ADA deficiencies.

- **Implementation Methods**
  - Describe the methods that will be used to make the facilities accessible and include the governing standard (e.g., 2010 ADA Standards, 2011 PROWAG).

The City of Boerne plans to evaluate all City-owned and/or maintained facilities for compliance with the 2010 ADA Standards for Accessible Design, and 2011 PROWAG.

3.4 Existing Facility Inventory

The first step in completing a Facility Evaluation Action Plan is understanding what facilities the City is responsible for maintaining and where each of these facilities is located. The existing facility inventory will include City-owned or maintained buildings, parks, signalized intersections, sidewalk corridors, unsignalized intersections and driveways along sidewalk corridors, and railroad crossings along sidewalk corridors. Inventories for buildings, parks, signalized intersections, sidewalk corridors, have been developed and are summarized in the following sections.
3.4.1 Buildings

Table 1 is a list of all City of Boerne-owned buildings with public access.

<table>
<thead>
<tr>
<th>Buildings</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. AgriCultural Museum &amp; Arts Center Restroom</td>
</tr>
<tr>
<td>2. Amphitheater and Restroom</td>
</tr>
<tr>
<td>3. Animal Shelter</td>
</tr>
<tr>
<td>4. City Hall</td>
</tr>
<tr>
<td>5. City Park Bathrooms and Tennis Center</td>
</tr>
<tr>
<td>6. City Park Pool</td>
</tr>
<tr>
<td>7. Fire Station</td>
</tr>
<tr>
<td>8. Library</td>
</tr>
<tr>
<td>9. Main Street Restroom</td>
</tr>
<tr>
<td>10. Nature Center Restroom</td>
</tr>
<tr>
<td>11. Parks Office</td>
</tr>
<tr>
<td>12. PD Station</td>
</tr>
<tr>
<td>13. River Road Bathroom</td>
</tr>
<tr>
<td>14. Visit Boerne Building</td>
</tr>
<tr>
<td>15. Water Works Terrace Bathrooms</td>
</tr>
</tbody>
</table>

All buildings with public access will be evaluated for compliance with the 2010 ADA Standards for Accessible Design, including parking lots, path of travel from the parking lot to the building, access into the building, signage, drinking fountains, telephones, bathrooms, and counter heights.

3.4.2 Parks and Trails

Table 2 is a list of all City of Boerne-owned parks and trails.
Table 2. Summary of Parks and Trails to be Reviewed

<table>
<thead>
<tr>
<th>Parks</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. City Lake Park</td>
</tr>
<tr>
<td>2. City Park</td>
</tr>
<tr>
<td>3. Kinderpark</td>
</tr>
<tr>
<td>4. Main Plaza</td>
</tr>
<tr>
<td>5. Northrup Park</td>
</tr>
<tr>
<td>6. Northrup Park</td>
</tr>
<tr>
<td>7. Northside Neighborhood Park</td>
</tr>
<tr>
<td>8. Northside Park</td>
</tr>
<tr>
<td>9. River Road Park</td>
</tr>
<tr>
<td>10. Roeder Park</td>
</tr>
<tr>
<td>11. Skate Park</td>
</tr>
<tr>
<td>12. Veterans Park</td>
</tr>
<tr>
<td>13. Waterworks Terrace</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Trails</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Cibolo Trail</td>
</tr>
<tr>
<td>2. Currey Trail</td>
</tr>
<tr>
<td>3. Old No. 9 Trail</td>
</tr>
</tbody>
</table>

All existing parks and trails will be evaluated for compliance with the 2010 ADA Standards for Accessible Design, including parking lots, path of travel from the parking lot to the park amenities, access into facilities, signage, drinking fountains and restrooms.

3.4.3 Signalized Intersections

All City-owned or maintained signalized intersections will be evaluated for compliance with PROWAG. Signalized intersection evaluations will document the conditions and measurements along the pedestrian path of travel, which includes street crossings, curb ramps, sidewalk adjacent to the curb ramps, and pedestrian signal equipment and adjacent clear spaces. Based on the inventory, the City maintains two (2) signalized intersections which are shown on a map in Appendix D.

3.4.4 Sidewalk Corridors

Using aerial imagery and existing inventory information, an updated Geographic Information System (GIS)-based inventory of City-maintained sidewalk corridors and cross street locations was developed in July 2022. Based on the inventory, the City of Boerne maintains approximately 82 miles of sidewalk corridors, including pedestrian street and driveway crossings. There are approximately 340 unsignalized cross street intersections and approximately 235 driveways and alleys along the City-maintained sidewalk corridors.

All City-maintained pedestrian paths of travel will be evaluated for compliance with PROWAG based on the conditions and measurements along the pedestrian path of travel, which includes the sidewalk, curb ramps, pedestrian crossings at driveway openings, and pedestrian crossings at unsignalized intersections with cross streets. At intersections where existing sidewalk does not cross the curb and curb ramps are not installed, no evaluations are
needed. Locations where curb ramps are missing, but are required, will also be identified and included in the Transition Plan.

The ADA of 1990, Section 35.150, Existing Facilities, requires that the Transition Plan include a schedule for providing curb ramps or other sloped areas at existing pedestrian walkways, which applies to all facilities constructed prior to 1992. For any sidewalk installations constructed from 1992 to March 15, 2012, the curb ramps should have been installed as part of the sidewalk construction project per the 1991 Standards for Accessible Design, Section 4.7 Curb Ramp, which states, “curb ramps complying with 4.7 shall be provided wherever an accessible route crosses a curb.” For sidewalk installations constructed on or after March 15, 2012, similar guidance is provided in the 2010 Standards for Accessible Design, Section 35.151 of 28 CFR Part 35, New Construction and Alterations, which states, “newly constructed or altered street level pedestrian walkways must contain curb ramps or other sloped areas at any intersection having curbs or barriers at intersections to streets, roads, or highways.”

A map of the sidewalk corridors to be evaluated is included in Appendix D.

3.4.5 Facility Inventory Summary

Based on the completed inventory, the City has identified the following facilities for evaluation:

- 15 buildings;
- 13 parks;
- 3 trails;
- 2 signalized intersections;
- 82 miles of sidewalk; and
- 340 unsignalized intersections and 235 driveways along the sidewalk corridors.

3.5 City of Boerne Facility Evaluation Action Plan

This City’s Facility Evaluation Action Plan assigns an evaluation priority level to all inventoried facilities, which allows the City to prepare a schedule to complete the evaluations.

Phased Facility Evaluation Approach

All facilities must be evaluated as part of an agency’s overall ADA Transition Plan. The City plans to phase the evaluation of facilities over the next several fiscal years.

Minimizing risk for pedestrians and risk for litigation are the City’s goals when determining the order in which to evaluate facilities. The facility evaluation priority levels were determined based on the following factors:

- **Number of existing complaints** – Locations with complaints identified by the public as problem areas should be evaluated as soon as possible to determine if the complaints are valid.

- **Proximity to pedestrian attractors** – Locations near pedestrian attractors (e.g., hospitals, retirement facilities, medical offices, parking garages, major employers, disability service providers, event facilities, bus or transit stop/routes, schools, government and public facilities, parks, libraries, and churches) are more likely to have a higher risk compared to those locations without pedestrian attractors.

- **Proximity to residential areas** – Locations near residential areas are more likely to have a higher risk than those locations adjacent to industrial areas where pedestrians are less likely to travel.
- **Number of crashes** – Locations with pedestrian-related crashes should be evaluated to determine if there is a design reason for the crashes.

- **Age of facility** – Facilities constructed after July 26, 1991 are a higher risk than those constructed before the 1991 Standards for Accessible Design were published since they were constructed out of compliance.

- **Roadway functional classification** – Arterials typically have higher pedestrian activity than local roadways and may be a higher risk.

- **Pedestrian/vehicle volumes** – Higher pedestrian/vehicle volume roadways are more likely to have higher risk than lower volume pedestrian/vehicle roadways. Pedestrian volumes may be quantified using indicators such as number of pedestrian actuations at signalized intersections.

- **Existing sidewalks** – The ADA does not require sidewalks to be installed, but existing sidewalks must be compliant, and the accessible route must be maintained in an accessible condition. Locations with existing sidewalks are a higher risk than locations without existing sidewalks.

- **Public input** – Receiving and taking into consideration feedback from the public to better understand their concerns is recommended. While formal complaints may not have been filed, areas of concern to the public are more likely to have a higher risk for litigation if an issue exists and the City does not respond and/or doesn't make any improvements.

Other factors to consider include:

- **Spatial distribution of facilities** – Selecting facilities to be evaluated evenly across different areas of the City or Council districts might be more well-received by the public, assuming all the risk factors above are equal.

- **Facility type** – Selecting a variety of different facilities to be evaluated during each phase, instead of all of the same facility type, may provide a better understanding of your high-risk areas. If the sidewalks evaluated are determined to be mostly compliant and the curb ramps evaluated are determined to be mostly non-compliant, the City may want to consider including a higher percentage of curb ramps during the next phase of evaluations.

**Upcoming Capital Improvement Projects (CIP)** – If curb ramps will be completely removed and replaced as part of an upcoming project, the ADA compliance of the new construction should be confirmed during construction inspections and resources would be better spent evaluating curb ramps that are not planned for reconstruction.

The final step is to execute the Facility Evaluation Action Plan. The Action Plan may be modified as needed during and in between Transition Plan phases to account for lessons learned or budget changes.

### 3.6 Schedule and Implementation Methods

It is acceptable for the City to phase the Self-Evaluation over several fiscal years; however, the DOJ and FHWA will not consider the initiative to be complete until all evaluations have been completed. As part of each phase of the Transition Plan, the City should determine and document in the Transition Plan the anticipated number of years.
required to complete the Self-Evaluation of City programs, services, activities, and facilities identified in Section 3.2 Program, Services, and Activities Inventory and Section 3.3 Existing Facility Inventory.

The evaluation of the City’s facilities will be completed over an estimated period of up to five years (through 2028), and updates to the City’s Transition Plan will be made to including findings and possible solutions for identified barriers. The timeframe to evaluate the City’s PSAs will be determined after development of the PSA inventory in a future project phase.

After the Self-Evaluation is complete, possible solutions have been identified, and cost estimates have been determined for each improvement, an implementation plan can be developed. Depending on the estimated cost of improvements, a typical implementation plan for an entity the size of the City of Boerne can range from 10 to 15 years. The implementation plan needs to show both a strong commitment toward upgrading ADA elements identified in the inventory of barriers in the short-term (planned capital improvement projects) and a strong commitment over time toward prioritizing curb ramps at walkways serving entities covered by the ADA. The implementation plan should also include prioritization information, planning, and investments directed at eliminating other identified barriers over time.

3.7 Prioritization

To aid in the development of the implementation plan, prioritization information has been provided for each facility with identified compliance issues. Table 3 provides the prioritization criteria for evaluated buildings and parks. Table 4 provides the prioritization criteria for signalized and unsignalized intersection curb ramps. Table 5 provides the prioritization schedule for the evaluated sidewalk corridors. All compliance elements included in the prioritization schedule are based on requirements from the 2010 ADA Standards for Accessible Design and PROWAG. While every effort will be made to design and implement improvements to be consistent with these standards, the City will provide access to the maximum extent feasible where full compliance is technically infeasible. Priorities were assigned based on DOJ priorities for facility access, previous project experience, and case law with respect to the severity of non-compliance. FHWA and DOJ have not provided any guidance on how to prioritize issues, only that prioritization information should be included as part of the schedule; however, best practices suggest that the prioritization methodology and resulting thresholds be first based on the severity of non-compliance (i.e., dangerous condition) and then second based on the barrier’s proximity to pedestrian attractors (e.g., adjacent to a hospital or governmental facility with high daily pedestrian traffic). Since raw data has and will continue to be collected during the Self-Evaluation, all data needed for prioritization is contained in the database except for known complaints. Any complaints received by the City will be reviewed, and associated prioritization updates will be incorporated into the database.

Sidewalk corridors include the entire pedestrian path of travel, including sidewalk, cross streets, and driveways. When prioritizing a sidewalk corridor, priorities for the entire pedestrian path of travel should be reported together. However, for project design and costing purposes, the recommended improvements for cross streets are more appropriately reported with the rest of the intersection improvements.

It should also be noted that sidewalks are not required by the ADA, but if they are installed, sidewalks must be compliant. Therefore, missing sidewalk segments are given a low priority.

To determine the priority for each facility, the raw data should be compared to the criteria in Tables 3, 4, and 5. To do this, start at Priority 1 and determine if any of the criteria apply. If yes, assign the facility a priority of 1. If no, move to Priority 2 and determine if any of the criteria apply. This process should be repeated until a priority has been assigned to all intersections and each sidewalk corridor segment.
3.7.1 Prioritization Factors for Facilities

Buildings, parks, and trails are prioritized on a 12-point scale, which is defined in Table 3. This prioritization methodology was developed by the Consultant Team to aid the City in determining how the building should be prioritized for improvements based on the severity of non-compliance with ADA.

Signalized and unsignalized intersections are prioritized on a 13-point scale, which is defined in Table 4. This prioritization methodology was developed by the Consultant Team to aid the City in determining which intersections should be prioritized for improvements over other intersections based on the severity of non-compliance with ADA.

Sidewalk corridors are prioritized on a 3-point scale and were given a priority of either “High”, “Medium”, or “Low” based on the severity of non-compliance, which is defined in Table 5. Compliant segments of the sidewalk corridor are given a priority label of “Compliant”.

[Remainder of page intentionally left blank]
<table>
<thead>
<tr>
<th>Priority</th>
<th>Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 (high)</td>
<td>Complaint known or imminent danger present</td>
</tr>
</tbody>
</table>
| 2 (high) | • Element is more than twice the allowable requirement. No known complaint.  
              • AND (for exterior conditions) location is near a hospital, school, transit stop, government building, or other pedestrian attractor. |
| 3 (high) | • Element is more than twice the allowable requirement. No known complaint.  
              • AND (for exterior conditions) location is not near a hospital, school, transit stop, government building, or other pedestrian attractor. |
| 4 (high) | Issues with parking or exterior conditions (DOJ level 1) – moderately out of compliance |
| 5 (medium) | Issues with access to goods and services (DOJ level 2) – severely out of compliance |
| 6 (medium) | Issues with:  
              • Access to goods and services (DOJ level 2) – moderately out of compliance;  
              • Parking or exterior conditions (DOJ level 1) – minimally out of compliance; OR  
              • Restrooms (DOJ level 3) – severely out of compliance |
| 7 (medium) | Issues with:  
              • Access to goods and services (DOJ level 2) – minimally out of compliance;  
              • Restrooms (DOJ level 3) – moderately out of compliance; OR  
              • Drinking fountains or public phones (DOJ level 4 & 5) – severely out of compliance |
| 8 (medium) | Issues with drinking fountains or public phones (DOJ level 4 & 5) - moderately out of compliance |
| 9 (low) | Issues with restrooms (DOJ level 3) – minimally out of compliance |
| 10 (low) | Issues with drinking fountains or public phones (DOJ level 4 & 5) - minimally out of compliance |
| 11 (low) | • Client is a Title II agency; AND  
              • Elements out of compliance, but may be able to be handled programmatically or do not need to be handled unless or until the agency hires a person with a disability |
| 12 (low) | Element is fully compliant with an older standard (safe-harbored), but will need to be brought into compliance with current standards if altered |
Table 4. Prioritization Factors for Signalized and Unsignalized Intersections

<table>
<thead>
<tr>
<th>Priority</th>
<th>Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 (high)</td>
<td>Complaint filed on curb ramp or intersection or known accident/injury at site</td>
</tr>
</tbody>
</table>
| 2 (high) | Existing curb ramp with any of the following conditions:  
- Running slope > 12%  
- Cross slope > 7%  
- Obstruction to or in the curb ramp or landing  
- Level change > ¼ inch at the bottom of the curb ramp  
- No detectable warnings  
AND within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations. |
| 3 (high) | No curb ramp where sidewalk or pedestrian path exists  
AND within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations. |
| 4 (high) | No curb ramps, but striped crosswalk exists |
| 5 (medium) | Existing curb ramp with any of the following conditions:  
- Running slope > 12%  
- Cross slope > 7%  
- Obstruction to or in the curb ramp or landing  
- Level change > ¼ inch at the bottom of the curb ramp  
- No detectable warnings  
AND NOT within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations. |
| 6 (medium) | No curb ramp where sidewalk or pedestrian path exists  
AND NOT within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations. |
| 7 (medium) | Existing diagonal curb ramp (serving both crossing directions on the corner) is non-compliant and should be replaced with two curb ramps, one serving each crossing direction on the corner. |
| 8 (medium) | Existing curb ramp with any of the following conditions:  
- Cross slope > 5%  
- Width < 36 inches  
- Median/island crossings that are inaccessible |
<p>| 9 (low) | Existing curb ramp with either running slope between 8.3% and 11.9% or insufficient turning space |
| 10 (low) | Existing diagonal curb ramp without a 48-inch extension into the crosswalk |
| 11 (low) | Existing pedestrian push button is not accessible from the sidewalk and/or curb ramp |
| 12 (low) | Existing curb ramp with returned curbs where pedestrian travel across the curb is not protected |
| 13 (low) | All other intersections not prioritized above |</p>
<table>
<thead>
<tr>
<th>Criteria</th>
<th>Priority</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cross slope of sidewalk is greater than 2%</td>
<td>1 (high) ≡ Value &gt; 3.5%</td>
</tr>
<tr>
<td></td>
<td>2 (medium) ≥ Value &gt; 2.0%</td>
</tr>
<tr>
<td>Width of sidewalk is less than 48 inches</td>
<td>Value ≤ 36.0”</td>
</tr>
<tr>
<td></td>
<td>36.0” &lt; Value &lt; 42.0”</td>
</tr>
<tr>
<td></td>
<td>42.0” &lt; Value &lt; 48.0”</td>
</tr>
<tr>
<td>Obstruction present along sidewalk</td>
<td>Obstruction - Permanent</td>
</tr>
<tr>
<td></td>
<td>Obstruction - Temporary</td>
</tr>
<tr>
<td>Heaving, sinking, or cracking present on sidewalk</td>
<td>Heaving</td>
</tr>
<tr>
<td></td>
<td>Sinking</td>
</tr>
<tr>
<td></td>
<td>Cracking</td>
</tr>
<tr>
<td>Ponding on sidewalk</td>
<td>Ponding</td>
</tr>
<tr>
<td>Missing sidewalk</td>
<td>Missing Sidewalk</td>
</tr>
<tr>
<td>Signalized cross street cross slope is greater than 5%</td>
<td>Value &gt; 9.0%</td>
</tr>
<tr>
<td></td>
<td>9.0% ≡ Value ≥ 7.0%</td>
</tr>
<tr>
<td></td>
<td>7.0% &gt; Value &gt; 5.0%</td>
</tr>
<tr>
<td>Unsignalized cross street cross slope is greater than 2%</td>
<td>Value &gt; 6.0%</td>
</tr>
<tr>
<td></td>
<td>6.0% ≡ Value ≥ 4.0%</td>
</tr>
<tr>
<td></td>
<td>4.0% &gt; Value &gt; 2.0%</td>
</tr>
<tr>
<td>Cross street running slope is greater than 5%</td>
<td>Value &gt; 7.0%</td>
</tr>
<tr>
<td></td>
<td>7.0% ≡ Value ≥ 6.0%</td>
</tr>
<tr>
<td></td>
<td>6.0% &gt; Value &gt; 5.0%</td>
</tr>
<tr>
<td>Driveway sidewalk width is less than 48 inches</td>
<td>Value ≤ 36.0”</td>
</tr>
<tr>
<td></td>
<td>36.0” &lt; Value &lt; 42.0”</td>
</tr>
<tr>
<td></td>
<td>42.0” &lt; Value &lt; 48.0”</td>
</tr>
<tr>
<td>Driveway (or sidewalk if applicable) cross slope is greater than 2%</td>
<td>Value &gt; 6.0%</td>
</tr>
<tr>
<td></td>
<td>6.0% ≡ Value ≥ 4.0%</td>
</tr>
<tr>
<td></td>
<td>4.0% &gt; Value &gt; 2.0%</td>
</tr>
<tr>
<td>Driveway (or sidewalk if applicable) condition is poor or poor dangerous</td>
<td>Elevation change greater than 1/2 inch or gaps greater than 1 inch</td>
</tr>
<tr>
<td></td>
<td>Elevation change between 1/4 inch and 1/2 inch or gaps between 1/2 inch and 1 inch</td>
</tr>
<tr>
<td>Railroad crossing excessive sidewalk vertical discontinuity</td>
<td>Elevation change greater than 1/4 inch or gaps greater than 1 inch</td>
</tr>
<tr>
<td>Railroad crossing prefabricated plate is plastic or does not exist</td>
<td>Yes – Plastic or No</td>
</tr>
<tr>
<td>Railroad crossing flangeway gap &gt; 3 inches (freight) or flangeway gap &gt; 2.5 inches (non-freight)</td>
<td>Value &gt; 3.0” (freight) or 2.5” (non-freight)</td>
</tr>
<tr>
<td>Railroad crossing is missing detectable warning surface(s)</td>
<td>No – Neither Side or Yes – 1 Side Only</td>
</tr>
</tbody>
</table>
3.8  Facilities Review

3.8.1  Buildings

Two (2) buildings within the City of Boerne were evaluated. All buildings included in the evaluation are listed in Table 6 and shown on the map in Appendix E.

<table>
<thead>
<tr>
<th>Buildings</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Patrick Heath Public Library</td>
<td>451 N Main St</td>
</tr>
<tr>
<td>2. Visit Boerne Building</td>
<td>282 N Main St</td>
</tr>
</tbody>
</table>

**Buildings: Self-Evaluation Observations**

Areas that were evaluated for each building included parking lots, path of travel from the parking lot to the building, access into the building, signage, drinking fountains, telephones, bathrooms, and counter heights. A complete list of issues is provided in the building facility reports (see Appendix F). Common issues identified included:

- Restrooms
- Doorways
- Kitchens
- Dining, Bar and Work Surfaces

**Buildings: Possible Solutions**

A complete list of possible solutions is provided in the building facility reports (see Appendix F).

3.8.2  Parks

Two (2) parks within the City of Boerne were evaluated. All parks included in the evaluation are listed in Table 7 and shown on the map in Appendix E.

<table>
<thead>
<tr>
<th>Parks</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. City Lake Park</td>
<td>1 City Lake Rd</td>
</tr>
<tr>
<td>2. Boerne City Park</td>
<td>106 City Park Rd</td>
</tr>
</tbody>
</table>
Parks: Self-Evaluation Observations

Areas that were evaluated for each park included parking lots, path of travel from the parking lot to the park amenities, access into facilities, signage, drinking fountains, and restrooms. A complete list of issues is provided in the park facility reports (see Appendix F). Common issues identified included:

- Accessible Routes
- Toilet and Bathing Rooms
- Parking
- Drinking Fountains

Parks: Possible Solutions

A complete list of possible solutions is provided in the park facility reports (see Appendix F).

3.8.3 Paved Trails

Approximately four (4) miles of paved trail within the City of Boerne was evaluated. All paved trails included in the evaluation are shown on the map in Appendix E.

Unpaved Trails: Self-Evaluation Observations

A complete list of issues is provided in the unpaved trail facility reports (see Appendix F). Common issues identified included:

- Toilet and Bathing Rooms
- Accessible Routes
- Protruding Object
- Parking

Unpaved Trails: Possible Solutions

A complete list of possible solutions is provided in the unpaved trail facility reports (see Appendix F).

3.8.4 Signalized Intersections

Two (2) signalized intersections within the City of Boerne were evaluated. Additionally, a hybrid pedestrian beacon was identified near Plant Ave and River Rd, and this location has been included with the signalized intersection evaluations, for a total of three (3) locations. Signalized intersection evaluations cataloged the conditions and measurements along the pedestrian path of travel, which includes street crossings, curb ramps, sidewalk adjacent to the curb ramps, and pedestrian signal equipment and adjacent clear spaces.

All signalized intersections included in the evaluation are listed on a map included in Appendix E.

Signalized Intersections: Self-Evaluation Observations

Common curb ramp issues included no flush transition where curb ramp meets roadway, ponding in the curb ramp, turning space (landing), or flares, obstructions in the curb ramp, turning space (landing), or flares, and non-compliant detectable warning surfaces. Table 8 provides a summary of the curb ramp issues at signalized intersections.

About 12% of pedestrian crossings at signalized intersections did not have pedestrian push buttons and 16% did not have pedestrian signal heads. Pedestrian push buttons and signal heads were recommended to be installed at all...
signalized intersection pedestrian crossings where they did not exist. Common issues associated with the existing pedestrian push buttons included non-existent or inaccessible push button clear spaces, push buttons installed at locations inconsistent with the current TMUTCD guidance, and missing pedestrian signal heads. Table 9 provides a summary of the push button issues.

Signalized Intersections: Possible Solutions

A complete list of possible solutions can be found in the signalized intersection reports provided in Appendix F.

Table 8. Summary of Curb Ramp Issues at Signalized Intersections

<table>
<thead>
<tr>
<th>Curb Ramp Element</th>
<th>Number Evaluated</th>
<th>Number Compliant</th>
<th>Percent Compliant</th>
</tr>
</thead>
<tbody>
<tr>
<td>Curb ramp present where curb ramp is needed</td>
<td>18</td>
<td>18</td>
<td>100%</td>
</tr>
<tr>
<td>Curb ramp lands in crosswalk</td>
<td>18</td>
<td>18</td>
<td>100%</td>
</tr>
<tr>
<td>Curbed sides are 90°</td>
<td>14</td>
<td>14</td>
<td>100%</td>
</tr>
<tr>
<td>Flare cross slope ≤ 10%</td>
<td>4</td>
<td>4</td>
<td>100%</td>
</tr>
<tr>
<td>Detectable warning surface exists</td>
<td>18</td>
<td>18</td>
<td>100%</td>
</tr>
<tr>
<td>Curb ramp turning space (landing) exists</td>
<td>18</td>
<td>18</td>
<td>100%</td>
</tr>
<tr>
<td>Curb ramp counter slope ≤ 5%</td>
<td>18</td>
<td>18</td>
<td>100%</td>
</tr>
<tr>
<td>Curb ramp turning space (landing) cross slope ≤ 2%</td>
<td>18</td>
<td>17</td>
<td>94.4%</td>
</tr>
<tr>
<td>Curb ramp running slope ≤ 8.3%</td>
<td>18</td>
<td>17</td>
<td>94.4%</td>
</tr>
<tr>
<td>Curb ramp width ≥ 48”</td>
<td>18</td>
<td>17</td>
<td>94.4%</td>
</tr>
<tr>
<td>Curb ramp cross slope ≤ 2%</td>
<td>18</td>
<td>16</td>
<td>88.9%</td>
</tr>
<tr>
<td>Curb ramp turning space (landing) running slope ≤ 2%</td>
<td>18</td>
<td>15</td>
<td>83.3%</td>
</tr>
<tr>
<td>Curb ramp does not have traversable sides</td>
<td>14</td>
<td>11</td>
<td>78.6%</td>
</tr>
<tr>
<td>Detectable warning surface is compliant</td>
<td>18</td>
<td>13</td>
<td>72.2%</td>
</tr>
<tr>
<td>No obstruction/surface condition issue in curb ramp, turning space (landing), or flares</td>
<td>18</td>
<td>13</td>
<td>72.2%</td>
</tr>
<tr>
<td>No ponding in curb ramp, turning space (landing), or flares</td>
<td>18</td>
<td>9</td>
<td>50.0%</td>
</tr>
<tr>
<td>Flush transition to roadway exists</td>
<td>18</td>
<td>9</td>
<td>50.0%</td>
</tr>
</tbody>
</table>
Table 9. Summary of Push Button Issues

<table>
<thead>
<tr>
<th>Push Button Element</th>
<th>Number Evaluated</th>
<th>Number Compliant</th>
<th>Percent Compliant</th>
</tr>
</thead>
<tbody>
<tr>
<td>Push button height ≤ 48”</td>
<td>14</td>
<td>14</td>
<td>100%</td>
</tr>
<tr>
<td>Push button diameter 2”</td>
<td>14</td>
<td>14</td>
<td>100%</td>
</tr>
<tr>
<td>Pedestrian push button sign is MUTCD approved</td>
<td>14</td>
<td>14</td>
<td>100%</td>
</tr>
<tr>
<td>Push button offset from curb ≤ 10’</td>
<td>14</td>
<td>14</td>
<td>100%</td>
</tr>
<tr>
<td>Cross slope of the clear space ≤ 2%</td>
<td>10</td>
<td>9</td>
<td>90%</td>
</tr>
<tr>
<td>Clear space is ≥ 30” x 48”</td>
<td>10</td>
<td>9</td>
<td>90%</td>
</tr>
<tr>
<td>Push button present where needed</td>
<td>16</td>
<td>14</td>
<td>88%</td>
</tr>
<tr>
<td>Pedestrian push button sign exists</td>
<td>16</td>
<td>14</td>
<td>87.5%</td>
</tr>
<tr>
<td>Push button offset from crosswalk ≤ 5’</td>
<td>14</td>
<td>12</td>
<td>85.7%</td>
</tr>
<tr>
<td>Push button orientation parallel to crossing</td>
<td>14</td>
<td>12</td>
<td>85.7%</td>
</tr>
<tr>
<td>Pedestrian head present where needed</td>
<td>14</td>
<td>12</td>
<td>85.7%</td>
</tr>
<tr>
<td>Push button reach range &gt; 10”</td>
<td>14</td>
<td>10</td>
<td>71.4%</td>
</tr>
</tbody>
</table>

Table 10 provides a summary of the prioritization classifications for signalized intersections

Table 10. Prioritization Summary Signalized Intersections

<table>
<thead>
<tr>
<th>Priority</th>
<th>Number of Intersections</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 (compliant)</td>
<td>0</td>
</tr>
<tr>
<td>1 (high)</td>
<td>0</td>
</tr>
<tr>
<td>2 (high)</td>
<td>1</td>
</tr>
<tr>
<td>3 (high)</td>
<td>0</td>
</tr>
<tr>
<td>4 (high)</td>
<td>0</td>
</tr>
<tr>
<td>5 (medium)</td>
<td>2</td>
</tr>
<tr>
<td>6 (medium)</td>
<td>0</td>
</tr>
<tr>
<td>7 (medium)</td>
<td>0</td>
</tr>
<tr>
<td>8 (medium)</td>
<td>0</td>
</tr>
<tr>
<td>9 (low)</td>
<td>0</td>
</tr>
<tr>
<td>10 (low)</td>
<td>0</td>
</tr>
<tr>
<td>11 (low)</td>
<td>0</td>
</tr>
<tr>
<td>12 (low)</td>
<td>0</td>
</tr>
<tr>
<td>13 (low)</td>
<td>0</td>
</tr>
<tr>
<td>Total</td>
<td>3</td>
</tr>
</tbody>
</table>
### 3.8.5 Sidewalk Corridors

The sidewalk corridor evaluations documented conditions and measurements along the pedestrian path of travel, which includes the sidewalk, railroad crossings, curb ramps, pedestrian crossings at driveway openings, and pedestrian crossings at unsignalized intersections with cross streets. Approximately three (3) miles of sidewalk were evaluated. The included sidewalk corridors were selected due to their high level of pedestrian activity as well as their proximity to pedestrian traffic generators. A map of the evaluated sidewalk corridors is provided in Appendix E.

#### Sidewalk Corridors: Self-Evaluation Observations

Common issues along the sidewalk corridors were excessive sidewalk cross slopes, vertical surface discontinuities that caused excessive level changes, excessive driveway and cross street cross slopes, permanent obstructions in the sidewalk such as power poles or utilities, and temporary obstructions in the sidewalk or path of travel such as weeds and low hanging branches. Where excessive vegetation was present, field crews attempted to assess the condition of the underlying sidewalk. Where possible, the condition of the underlying sidewalk was recorded; however, the City of Boerne may find additional issues with the sidewalk once the temporary obstruction is removed.

Common curb ramp issues at unsignalized intersections along the sidewalk corridors included curb ramps having excessive flare cross slopes, no presence of color contrast or texture contrast (detectable warning surfaces), excessive curb ramp running slopes, and no flush transitions from curb ramp to roadway. A summary of the unsignalized intersection curb ramp issues is provided in Table 11. Non-compliant curb ramps, sidewalk, and pedestrian paths of travel along driveways and street crossings at unsignalized intersections were recommended to be removed and replaced.

The ADA of 1990, Section 35.150, Existing Facilities, requires that the Transition Plan include a schedule for providing curb ramps or other sloped areas at existing pedestrian walkways, which applies to all facilities constructed prior to 1992. For any sidewalk installations constructed from 1992 to March 15, 2012, the curb ramps should have been installed as part of the sidewalk construction project per the 1991 ADA Standards, Section 4.7 Curb Ramp, which states, “curb ramps complying with 4.7 shall be provided wherever an accessible route crosses a curb.” For sidewalk installations constructed on or after March 15, 2012, similar guidance is provided in the 2010 ADA Standards, Section 35.151 of 28 Code of Federal Regulations (CFR) Part 35, New Construction and Alterations, which states, “newly constructed or altered street level pedestrian walkways must contain curb ramps or other sloped areas at any intersection having curbs or barriers to entry at intersections to streets, roads, or highways.”

#### Sidewalk Corridors: Possible Solutions

To meet the federal requirements for curb ramp installations, the following recommendations were made:

- Where sidewalk leads up to the curb at an intersection, both parallel and perpendicular to the project corridor, two (2) directional curb ramps were recommended to be installed where geometry permitted. PROWAG requires two (2) directional curb ramps be installed during modifications unless there are existing physical constraints.

- Where sidewalk parallel to the project corridor leads up to the curb at a driveway, directional curbs ramps were recommended to be installed to serve the driveway crossing.

- Where diagonal curb ramps were installed with the intent to serve a side-street crossing only, receiving curb ramps are still required to be installed on the opposite side of the major street. However, an engineering study should be performed prior to the installation of the receiving curb ramps to determine if the major street crossing is safe to accommodate. If the engineering study determines the major street crossing is unsafe to accommodate, the existing diagonal curb ramps should be removed and replaced with directional
curb ramps in addition to the other requirements noted in Section 3.5 Federal Highway Administration (FHWA) Guidance on Closing Pedestrian Crossings.

The following possible solutions were made to improve pedestrian safety and are incorporated into the unsignalized intersection and driveway reports. These improvements are based on engineering judgement but are not required by federal accessibility standards.

- For all existing, unmarked pedestrian street crossings at unsignalized intersections, the installation of crosswalk markings is recommended. Pedestrian street crossings are defined by the curb ramp installation recommendations on the previous page. The 2009 MUTCD states that on approaches controlled by STOP or YIELD signs, crosswalk markings should be installed where engineering judgement dictates markings are needed to provide guidance for pedestrians who are crossing roadways by defining and delineating paths on approaches where traffic stops. Additionally, in conjunction with signs and other measures, crosswalk markings help to alert road users of a designated pedestrian crossing point across roadways at locations that are not controlled by traffic control signals or STOP or YIELD signs.

- For pedestrian crossings across commercial driveways, detectable warning surfaces are recommended to be installed on curb ramps or sidewalk approaches on either side of the driveway. PROWAG states that detectable warning surfaces should not be provided at crossings of residential driveways since the pedestrian right-of-way continues across residential driveway aprons. However, where commercial driveways are provided with yield or stop control, detectable warning surfaces should be provided at the junction between the pedestrian route and the vehicular route.

A complete list of possible solutions can be found in the sidewalk and unsignalized intersection facility reports provided in Appendix F.
<table>
<thead>
<tr>
<th>Curb Ramp Element</th>
<th>Number Evaluated</th>
<th>Number Compliant</th>
<th>Percent Compliant</th>
</tr>
</thead>
<tbody>
<tr>
<td>Curb ramp lands in crosswalk</td>
<td>180</td>
<td>180</td>
<td>100%</td>
</tr>
<tr>
<td>Curb ramp does not have traversable sides</td>
<td>164</td>
<td>164</td>
<td>100%</td>
</tr>
<tr>
<td>Curb ramp turning space (landing) exists</td>
<td>178</td>
<td>175</td>
<td>98.3%</td>
</tr>
<tr>
<td>Curbed sides are 90°</td>
<td>164</td>
<td>158</td>
<td>96.3%</td>
</tr>
<tr>
<td>Curb ramp counter slope ≤ 5%</td>
<td>180</td>
<td>163</td>
<td>90.6%</td>
</tr>
<tr>
<td>Curb ramp width ≥ 48”</td>
<td>180</td>
<td>155</td>
<td>86.1%</td>
</tr>
<tr>
<td>Curb ramp present where curb ramp is needed</td>
<td>211</td>
<td>180</td>
<td>85%</td>
</tr>
<tr>
<td>Curb ramp turning space (landing) running slope ≤ 2%</td>
<td>175</td>
<td>140</td>
<td>80.0%</td>
</tr>
<tr>
<td>No obstruction in curb ramp, turning space (landing), or flares</td>
<td>178</td>
<td>126</td>
<td>70.8%</td>
</tr>
<tr>
<td>Curb ramp turning space (landing) cross slope ≤ 2%</td>
<td>175</td>
<td>122</td>
<td>69.7%</td>
</tr>
<tr>
<td>No ponding in curb ramp, turning space (landing), or flares</td>
<td>178</td>
<td>122</td>
<td>68.5%</td>
</tr>
<tr>
<td>48” crosswalk extension exists</td>
<td>9</td>
<td>6</td>
<td>66.7%</td>
</tr>
<tr>
<td>Detectable warning surface is compliant</td>
<td>31</td>
<td>20</td>
<td>64.5%</td>
</tr>
<tr>
<td>Curb ramp cross slope ≤ 2%</td>
<td>178</td>
<td>111</td>
<td>62.4%</td>
</tr>
<tr>
<td>Flush transition to roadway exists</td>
<td>180</td>
<td>111</td>
<td>61.7%</td>
</tr>
<tr>
<td>Curb ramp running slope ≤ 8.3%</td>
<td>178</td>
<td>98</td>
<td>55.1%</td>
</tr>
<tr>
<td>Detectable warning surface exists</td>
<td>132</td>
<td>31</td>
<td>23.5%</td>
</tr>
<tr>
<td>Flare cross slope ≤ 10%</td>
<td>14</td>
<td>3</td>
<td>21.4%</td>
</tr>
</tbody>
</table>
Table 12 and Table 13 provide summaries of the prioritization classifications for sidewalks and unsignalized intersections, respectively.

### Table 12. Prioritization Summary for Sidewalk Corridors

<table>
<thead>
<tr>
<th>Line type</th>
<th>1 (high)</th>
<th>2 (medium)</th>
<th>3 (low)</th>
<th>Compliant</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sidewalks</td>
<td>0.46</td>
<td>0.66</td>
<td>0.06</td>
<td>1.29</td>
<td>2.47</td>
</tr>
<tr>
<td>Driveways</td>
<td>0.13</td>
<td>0.06</td>
<td>0.05</td>
<td>0.17</td>
<td>0.41</td>
</tr>
<tr>
<td>Cross Streets</td>
<td>0.03</td>
<td>0.03</td>
<td>0.03</td>
<td>0.13</td>
<td>0.22</td>
</tr>
<tr>
<td>Total</td>
<td>0.62</td>
<td>0.75</td>
<td>0.14</td>
<td>1.59</td>
<td>3.10</td>
</tr>
</tbody>
</table>

### Table 13. Prioritization Summary for Unsignalized Intersections

<table>
<thead>
<tr>
<th>Priority</th>
<th>Number of Intersections</th>
</tr>
</thead>
<tbody>
<tr>
<td>0 (compliant)</td>
<td>3</td>
</tr>
<tr>
<td>1 (high)</td>
<td>0</td>
</tr>
<tr>
<td>2 (high)</td>
<td>58</td>
</tr>
<tr>
<td>3 (high)</td>
<td>3</td>
</tr>
<tr>
<td>4 (high)</td>
<td>1</td>
</tr>
<tr>
<td>5 (medium)</td>
<td>17</td>
</tr>
<tr>
<td>6 (medium)</td>
<td>0</td>
</tr>
<tr>
<td>7 (medium)</td>
<td>1</td>
</tr>
<tr>
<td>8 (medium)</td>
<td>0</td>
</tr>
<tr>
<td>9 (low)</td>
<td>4</td>
</tr>
<tr>
<td>10 (low)</td>
<td>0</td>
</tr>
<tr>
<td>11 (low)</td>
<td>0</td>
</tr>
<tr>
<td>12 (low)</td>
<td>0</td>
</tr>
<tr>
<td>13 (low)</td>
<td>4</td>
</tr>
<tr>
<td>Total</td>
<td>91</td>
</tr>
</tbody>
</table>
3.9 Conclusion

This document serves as the ADA Transition Plan for the City of Boerne. In developing the Transition Plan, an evaluation was conducted on the following facilities:

- 2 buildings;
- 2 parks;
- 3 paved trails;
- 3 signalized intersections; and
- 3 miles of sidewalk and all unsignalized intersections and driveways along the sidewalk corridors

The possible solutions were prioritized and an implementation plan was developed to provide guidance for the City’s improvement projects in the coming years. Public outreach was also conducted to aid in the development of the plan.

The City is taking the actions referenced below and will continue to look for and remedy, barriers to access to ensure that City of Boerne citizens who are disabled are given access to the City’s PSAs.

To confirm follow-up on corrective actions required under the Transition Plan, the City will institute an ADA Action Log, documenting its efforts at compliance with the ADA. At a minimum, the Action Log will identify items that are not ADA compliant and will include anticipated completion dates. After the adoption of the Transition Plan by the governing body of the City, the ADA Action Log will be updated on an annual basis. The ADA Action Log should be available upon request. The ADA Action Log is provided in Appendix G.

[Remainder of page intentionally left blank]
4.0 Facility Costs

4.1 Facilities Cost Projection Overview

To identify funding sources and develop a reasonable implementation schedule, cost projection summaries for only the facilities evaluated were developed for each facility type. To develop these summaries, recent bid tabulations from the TxDOT construction projects, along with Consultant Team experience with similar types of projects, were the basis for the unit prices used to calculate the improvement costs. A contingency percentage (20%) was added to the subtotal to account for increases in unit prices in the future in addition to an engineering design percentage (15%). All costs are in 2023 dollars. Table 14 provides a summary of the estimated costs to bring each facility into compliance.

Table 14. Summary of Facility Costs

<table>
<thead>
<tr>
<th>Facility Type</th>
<th>Priority</th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>High</td>
<td>Medium</td>
<td>Low</td>
<td>Total*</td>
</tr>
<tr>
<td>Buildings</td>
<td>$0</td>
<td>$29,900</td>
<td>$32,100</td>
<td>$62,000</td>
</tr>
<tr>
<td>Parks</td>
<td>$44,800</td>
<td>$127,000</td>
<td>$23,100</td>
<td>$194,900</td>
</tr>
<tr>
<td>Trails</td>
<td>$6,000</td>
<td>$13,600</td>
<td>$5,600</td>
<td>$25,200</td>
</tr>
<tr>
<td>Signalized Intersections</td>
<td>$30,300</td>
<td>$115,900</td>
<td>$0</td>
<td>$146,200</td>
</tr>
<tr>
<td>Public Rights-of-Way Sidewalk</td>
<td>$368,200</td>
<td>$349,700</td>
<td>$96,000</td>
<td>$813,900</td>
</tr>
<tr>
<td>Public Rights-of-Way Unsignalized Intersections</td>
<td>$987,600</td>
<td>$290,800</td>
<td>$48,000</td>
<td>$1,326,400</td>
</tr>
<tr>
<td>City Totals</td>
<td>$1,436,900</td>
<td>$926,900</td>
<td>$204,800</td>
<td>$2,568,600</td>
</tr>
</tbody>
</table>

*Table values are rounded for simplification.

It is important to note that the facility cost estimates in Table 14 only include the costs to remediate accessibility compliance issues as determined by a visual inspection of the facilities. Additional budget considerations should be given to the following:

- Aesthetic upgrades, such as remodeling/upgrading of outdated facilities;
- Current market conditions that may affect pricing of construction materials and labor, such as COVID-19;
- Construction challenges not visible during inspection, such as underground or in-wall utilities; and
- Other factors that may affect costs.

It is recommended that a design professional assist the City in determining the best overall design solutions with respect to various factors, including but not limited to, existing conditions, available construction budget, and consideration for all elements that are out of compliance in a particular area of a facility.

4.2 Implementation Schedule

Table 15 details the barrier removal costs and proposed implementation schedule by facility type for all City-owned facilities evaluated. Actual annual budgets will vary to accommodate project scopes. For example, all barriers at a single intersection are recommended to be removed within the same project scope. Because cost projections vary by intersection, the actual annual budget may vary to accommodate all improvements at an intersection. This 18-year plan will serve as the implementation schedule for the Transition Plan. The City of Boerne reserves the right to
change the barrier removal priorities on an ongoing basis to allow flexibility in accommodating community requests, petitions for reasonable modifications from persons with disabilities, and changes in City programs.

It is the intent of the City to have its ADA Coordinator work together with department heads and budget staff to determine the funding sources for barrier removal projects. Once funding is identified, the ADA Coordinator will coordinate the placement of the projects in the Capital Improvement Program (CIP) to be addressed on a fiscal year basis.

**Table 15. Implementation Schedule**

<table>
<thead>
<tr>
<th>Facility Type</th>
<th>Estimated Cost</th>
<th>Implementation Schedule (years)</th>
<th>Approximate Annual Budget*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Buildings</td>
<td>$62,000</td>
<td>18</td>
<td>$3,500</td>
</tr>
<tr>
<td>Parks</td>
<td>$194,900</td>
<td>18</td>
<td>$10,900</td>
</tr>
<tr>
<td>Trails</td>
<td>$25,200</td>
<td>18</td>
<td>$1,400</td>
</tr>
<tr>
<td>Signaled Intersections</td>
<td>$146,200</td>
<td>18</td>
<td>$8,200</td>
</tr>
<tr>
<td>Public Rights-of-Way Sidewalk</td>
<td>$813,900</td>
<td>18</td>
<td>$45,300</td>
</tr>
<tr>
<td>Public Rights-of-Way Unsignalized Intersections</td>
<td>$1,326,400</td>
<td>18</td>
<td>$73,700</td>
</tr>
<tr>
<td><strong>City Total</strong></td>
<td><strong>$2,568,600</strong></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

*Table values are rounded for simplification

4.3 Funding Opportunities

Several alternative funding sources are available to the City to complete the improvements in this Transition Plan. The funding opportunities include applying for resources at the federal and state level, consideration of local options, and leveraging private resources. The following sections detail some different funding source options.

4.3.1 Federal and State Funding

There is federal and state funding available for the City to apply for through numerous agencies for various improvements. A summary of the available funding opportunities is provided in Appendix H. A copy of this information is also available on the FHWA website: https://www.fhwa.dot.gov/environment/bicycle_pedestrian/funding/

Most of these programs are competitive type grants; therefore, the City of Boerne is not guaranteed to receive these funds. It will be important for the City to track these programs to apply for the funds. Federal-aid funding programs have specific requirements that projects must meet, and eligibility must be determined on a case-by-case basis.
4.3.2 Local Funding

There are several local funding options for the City to consider, including:

- Community Development Block Grants (CDBG)
- Community Improvement District (CID) – A geographically defined district in which commercial property owners vote to impose a self-tax. Funds are then collected by the taxing authority and given to a board of directors elected by the property owners.
- General fund (sales tax and bond issue)
- Scheduled/funded CIP projects that are funded through bonds
- Sidewalk or Access Improvement Fee
- Special tax districts – A district with the power to provide some governmental or quasi-governmental service and to raise revenue by taxation, special assessment, or charges for services.
- Tax Allocation District (TAD) – A defined area where real estate property tax monies gathered above a certain threshold for a certain period of time (typically 25 years) is to be used for a specified improvement. The funds raised from a TAD are placed in a tax-free bond (finance) where the money can continue to grow. These improvements are typically for revitalization and especially to complete redevelopment efforts.
- Tax Increment Financing District (TIF) – A TIF allows cities to create special districts and to make public improvements within those districts that will generate private-sector development. During the development period, the tax base is frozen at the predevelopment level. Property taxes continue to be paid, but taxes derived from increases in assessed values (the tax increment) resulting from new development either go into a special fund created to retire bonds issued to originate the development, or leverage future growth in the district.
- Transportation User Fee / Street Maintenance Fee

4.3.3 Private Funding

Private funding may include local and national foundations, endowments, private development, and private individuals. While obtaining private funding to provide improvements along entire corridors might be difficult, it is important for the City to require private developers to improve pedestrian facilities to current ADA requirements, whether it be by new development or redevelopment of an existing property.
5.0 Conclusion and Next Steps

This document serves as the Americans with Disabilities Act Transition Plan for the City of Boerne. The City plans to complete the Self-Evaluation of programs, services, activities, and facilities identified in this document.

The next steps for the City of Boerne are:

1. Finalize development of the programs, services, activities, and facilities inventories. Develop an Action Plan for completing a Self-Evaluation for all City programs, services, activities, and facilities. The third ADA Transition Plan project phase will begin in fiscal year 2024 to continue evaluation of pedestrian facilities in the public rights-of-way.

2. Complete a Self-Evaluation for all City programs, services, activities, and facilities. Facility evaluations should also include the following:
   a. Facility reports with the compliance status of each element evaluated based on the 2010 ADA Standards for Accessible Design, and PROWAG;
   b. Possible solutions to remove any barriers and bring the element into compliance;
   c. Estimated costs of possible solutions; and
   d. Prioritization of the individual facility, independent of other locations of the same facility type.

3. Develop an Implementation Plan, including schedule for completing the recommended facility improvements and funding sources to be used.

4. If a phased Self-Evaluation approach is used, complete remaining Self-Evaluation phases and update the City’s ADA Transition Plan after each additional phase.

5. Continue to update the City’s ADA Transition Plan as projects are implemented and citizen requests/complaints are received.

6. Determine the best approach for continuing to receive and document public input on the ADA Transition Plan.
Appendix

Appendix A: Public Outreach

Appendix B: Grievance Procedure and Public Notice

  City of Boerne Title II Grievance Procedure
  City of Boerne Title II Grievance Form
  Public Notice Under the ADA

Appendix C: Federal Highway Administration ADA Transition Plans Memo

Appendix D: Facility Inventory Map

Appendix E: Evaluated Facility Maps

Appendix F: Facility Reports

Appendix G: ADA Action Log

Appendix H: Federal and State Funding Opportunities