



Town of Highland Park

Americans with Disabilities Act (ADA) Self-Evaluation and Transition Plan

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Abbreviations

ABA – Architectural Barriers Act

ADA – Americans with Disabilities Act

ADAAG – Americans with Disabilities Act Accessibility Guidelines

CFR – Code of Federal Regulations

CID – Community Improvement District

CIP – Capital Improvement Projects

DOJ – United States Department of Justice

DOT – United States Department of Transportation

FHWA – Federal Highway Administration

MUTCD – Manual on Uniform Traffic Control Devices for Streets and Highways

PROWAG –2023 Public Rights-of-Way Accessibility Guidelines Final Rule

PSA – Programs, Services, and Activities

TAD – Tax Allocation District

TAC – Texas Administrative Code

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 Town of Highland Park to update their ADA Transition Plan. Prioritization methodology for evaluating and implementing improvements was developed based on the applicable ADA Standards and 2023 Public Rights-of-Way Accessibility Guidelines Final Rule (PROWAG), and the details are provided in this document.

This document includes an overview of the ADA and provides recommendations for the Town of Highland Park 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 ADA 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 Town of Highland Park 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 Town of Highland Park is obligated to observe all requirements of Title I in its employment practices; Title II in its policies, programs, services, and facilities; any parts of Titles IV and V that apply to the Town and its programs, services, or facilities; and all requirements specified in the applicable ADA Standards and PROWAG that apply to facilities and other physical holdings.

Title II has the broadest impact on the Town. 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 future evaluations of the Town of Highland Park's PSAs and facilities. After the evaluations are complete, possible solutions to remove barriers to access will be documented in the Transition Plan, 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 Town's ongoing commitment to the development and maintenance of PSAs and facilities that accommodate all its residents.

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 Town sponsored events

1.4.3 Ongoing Accessibility Improvements

After the initial evaluations are complete, Town PSAs and facilities 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 Town's website for review and consideration by the public.

1.4.4 Town of Highland Park Approach

The purpose of the Transition Plan is to provide the framework for achieving equal access to the Town of Highland Park's PSAs within a reasonable timeframe. The Town's elected officials and staff believe that accommodating persons with disabilities is essential to good customer service, ensures the quality of life Highland Park residents seek to enjoy, and guides future improvements.

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

1.5 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 Town should first confirm if the property is on, or eligible to be added to, 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 two (2) historic sites within the Town of Highland Park, but there may be other documentation available not provided on these websites. The historic sites identified include the following; however, these sites are not owned or maintained by the Town:

- Highland Park Shopping Village
- Mark and Maybelle Lemmon House

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 Town 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 Town.

1.6 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. 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 standards are the 2010 ADA Standards, which set 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 its design standards for pedestrian facilities.

2010 ADA Standards

The DOJ's revised regulations for Titles II and III of the ADA were published in the Federal Register on September 15, 2010. These regulations adopted revised, enforceable accessibility standards called the 2010 ADA Standards. On March 15, 2012, compliance with the 2010 ADA 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 ADA Standards for program accessibility and barrier removal.

Public Rights-of-Way Accessibility Guidelines (PROWAG)

The U.S. Access Board recently published new guidelines under the ADA and the Architectural Barriers Act (ABA) that address access to sidewalks and streets, crosswalks, curb ramps, pedestrian signals, on-street parking, and other components of public rights-of-way. These guidelines also review shared use paths, which are designed primarily for use by bicyclists and pedestrians for transportation and recreation purposes. PROWAG provides minimum guidelines for the accessibility of pedestrian facilities in the public rights-of-way. When these guidelines are adopted, with or without modifications, as accessibility standards in regulations issued by other federal agencies implementing the ADA, Section 504 of the Rehabilitation Act, and the ABA, compliance with those enforceable accessibility standards is mandatory. The final rule was published on August 8, 2023, and became effective on September 7, 2023.

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 and Transportation Compliance Board (Access Board) on July 26, 2011, 36 CFR Part 1190 or its final adopted guidelines.*

Until the U.S. Department of Transportation (DOT) and DOJ adopt accessibility standards for pedestrian facilities in the public right-of-way, public entities have some degree of flexibility in determining how they will comply with the general obligation under Title II of the ADA (to operate each service, program, or activity so that it is "readily accessible and useable by" individuals with disabilities). Public entities are not required to adopt the Final PROWAG at this time but may turn to different resources for guidance (e.g., Final PROWAG, DOJ's 2010 ADA Standards for buildings and site, and other accessibility resources). However, it is recommended that the Town of Highland Park adopt PROWAG so that it becomes an enforceable document for all Town projects within the public rights-of-way, regardless of PROWAG's adoption status at the state and federal level.

When DOT undertakes its own rulemaking to adopt PROWAG as enforceable standards, DOT will determine how to ensure that there is no "conflict" within its own regulations (i.e., no inconsistencies between the adopted public rights-of-way accessibility standards and the Manual on Uniform Traffic Control Devices for Streets and Highways (MUTCD).

Manual on Uniform Traffic Control Devices for Streets and Highways (MUTCD)

The MUTCD defines the standards used by road managers nationwide to install and maintain traffic control devices on all streets, highways, pedestrian and bicycle facilities, and site roadways open to public travel. The MUTCD is published by the FHWA under 23 CFR, Part 655, Subpart F and is a compilation of national

standards for all traffic control devices, including road markings, highway signs, and traffic signals. It is updated periodically to accommodate the nation's changing transportation needs and address new safety technologies, traffic control tools, and traffic management techniques. On December 19, 2023, a Final Rule adopting the 11th Edition of the MUTCD was published in the Federal Register with an effective date of January 18, 2024.

The current version of the Texas Manual on Uniform Traffic Control Devices (TMUTCD) is Revision 2 of the 2011 TMUTCD, which became effective on October 9, 2014, and remains effective until a new TMUTCD is adopted into Texas law by the Texas Transportation Commission. A new version of the TMUTCD is being revised based upon the new federal MUTCD and Texas State laws. Texas has two years from the federal MUTCD effective date to adopt the new TMUTCD.

1.7 Maintenance Versus Alterations

The 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 Town of Highland Park staff who regularly are involved in maintenance and alteration projects in the public rights-of-way.

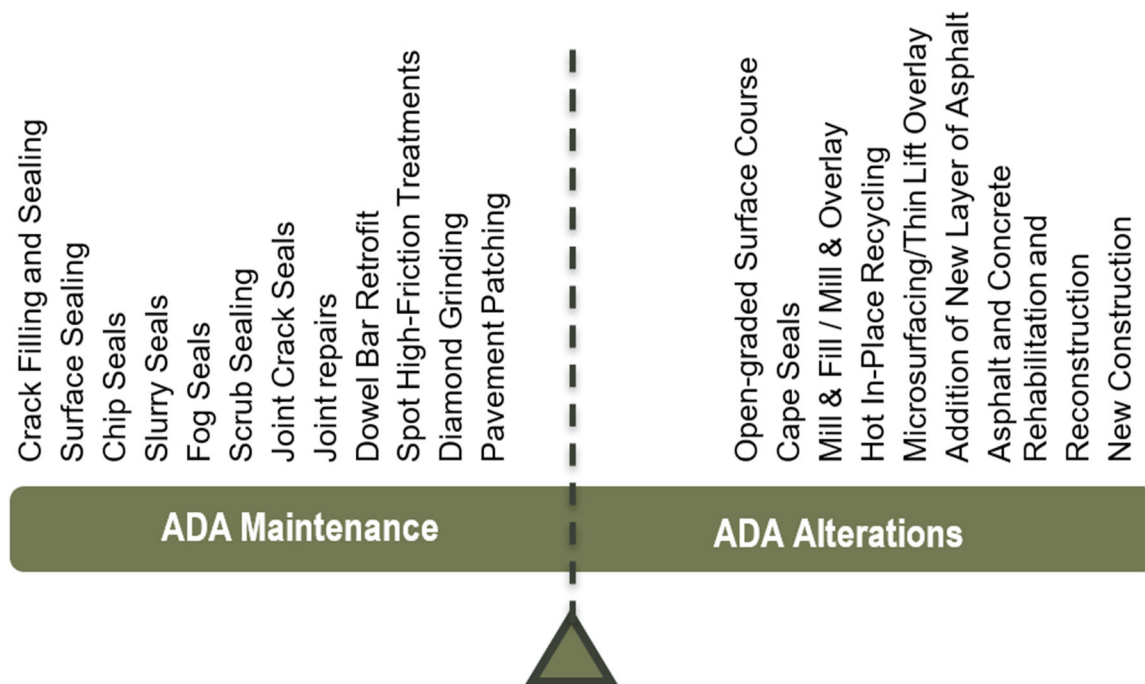
The ADA is a civil rights statute prohibiting discrimination against persons with disabilities in all aspects of life, including transportation, based on regulations promulgated by the DOJ. DOJ's regulations require accessible planning, design, and construction to integrate people with disabilities into 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.

Figure 1. Maintenance versus Alteration Projects



Source: DOJ Briefing Memorandum on Maintenance versus Alteration Projects

1.8 Closing Pedestrian Crossings

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 Town and not included in the scope of this Transition Plan) determines the crossing is not safe for any user. The crossing should be closed in accordance with PROWAG:

- At an intersection corner where pedestrian crossing is prohibited, curb ramps or blended transitions shall not be provided, and the pedestrian circulation path shall be either (a) separated from the roadway with landscaping or other non-prepared surface or (b) separated from the roadway by a detectable vertical edge treatment with a bottom edge 15 inches maximum above the pedestrian circulation path (PROWAG Section R203.6.1.1).
- At a mid-block or roundabout crosswalk where pedestrian crossing is not intended, curb ramps or blended transitions shall not be provided, and the pedestrian circulation path shall be either (a) separated from the roadway with landscaping or other non-prepared surface or (b) separated from the roadway by a detectable vertical edge treatment with a bottom edge 15 inches maximum above the pedestrian circulation path (PROWAG Section R203.6.1.2)

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 Town of Highland Park will only consider closing an existing pedestrian crossing if it is determined to be unsafe by an engineering study.

1.9 Existing Town Programs that Implement ADA Upgrades

The Town of Highland Park currently implements ADA compliant designs through the following efforts:

- The Town's Sidewalk Maintenance Program is used to prevent and repair unsafe sidewalks in the interest of public safety and ADA compliance.
- Sidewalk is required to be installed during all new residential construction and residential corner lots are required to have curb ramps installed.
- Lakeside Park is currently being upgraded. Improvements will include improved grading and drainage, landscaping, sidewalk connections, bench pad locations, and an ADA accessibility ramp east of the pedestrian bridge. Landscape rehabilitation will focus on areas where tree coverage, pedestrian traffic, and ducks have compromised existing sod and/or ground cover.

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2.0 Public Outreach

The Town is in the process of developing a web survey open to the public to solicit feedback from the public on the Self-Evaluation and Transition Plan. The survey will be designed to help the Town locate areas of greatest concern to the public and help provide better access to the community. Additional information regarding the survey and responses will be provided after the comment period closes.

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3.0 Self-Evaluation and Summary of Observations

The Town of Highland Park's ADA Transition Plan will include the results of a comprehensive review of the PSAs provided to the public. The Plan will also include the observations from facility evaluations of all Town-owned/maintained buildings and associated parking lots, parks and associated parking lots, park sidewalk and associated curb ramps, signalized intersections, and public rights-of-way sidewalks and associated curb ramps.

3.1 Programs, Services, and Activities Review

Under the ADA, the Town of Highland Park is required to complete a Self-Evaluation of the Town's facilities, services, policies, and practices to identify those that are inconsistent with Title II requirements. The Self-Evaluation should consider all Town PSAs, as well as the policies and practices the Town uses to implement its various programs and services.

Where Title II requirements are not being met, the Town 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 Town should attempt to give priority to the method that promotes inclusion among all users, including individuals with disabilities.

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

However, the Town 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 Town, such as the Town Administrator 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 determined to be unduly burdensome, the Town 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

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 Town of Highland Park has appointed Allison Keene as ADA/504 Coordinator. Below is the ADA Coordinator's contact information.

Allison Keene, ADA/504 Coordinator
HR Coordinator
Human Resources
4700 Drexel Drive
Highland Park, TX 75205
Office: 214-559-4161
Texas Relay: 7-1-1
akeene@hptx.org

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

- Post on the Town 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 Town 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 Town 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 DOJ:

- 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 Town's efforts to comply with Title II and investigating any complaints related to potential violations of Title II. The role of the ADA/504 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/504 Coordinator will

be able to efficiently assist people with disabilities with their questions. These roles and responsibilities are consistent with the DOJ's guidance for "An Effective ADA Coordinator" (<https://archive.ada.gov/pcatoolkit/chap2toolkit.htm>).

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

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 Town level, rather than require the complainant to resort to resolution at the federal level. Neither Title II nor its implementing regulations describe what ADA grievance procedures must include; however, the DOJ suggests the following content:

- A description of how and where a complaint under Title II may be filed with the government entity;
- If a written complaint is required, a statement notifying potential complainants that alternative means of filing will be available to people with disabilities who require such an alternative;
- A description of the time frames and processes to be followed by the complainant and the government entity;
- Information on how to appeal an adverse decision; and
- A statement of how long complaint files will be retained.

The Town of Highland Park's ADA grievance policy and procedure were developed in March 2024. A copy of the Town's Title II ADA Grievance Policy, Procedure, and Form will be posted on the Town website.

3.1.4 ADA Public Notice

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. The DOJ 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. Publishing and publicizing the ADA notice is not a one-time requirement. The Town should provide the information on an ongoing basis, whenever necessary. DOJ suggestions for ways to provide notice are provided at:

<https://archive.ada.gov/pcatoolkit/chap2toolkit.htm>.

The Town of Highland Park Public Notice Under the ADA was developed in March 2024. A copy of the Town's Public Notice Under the ADA will be posted on the Town website.

3.2 Program, Services, and Activities Inventory

The Town of Highland Park has compiled a list of all Town PSAs required to be reviewed for compliance with Title II of the ADA. The Town will evaluate 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.

The Self-Evaluation of these PSAs will be completed over an estimated one (1) year period and updates to the Town's ADA Transition Plan will be made to including observations and possible solutions for identified barriers. **Table 1** detail the identified PSAs for review.

Table 1. Summary of Programs, Service, and Activities Inventory

PSA Element	Quantity Identified	Description
Departments	10	All Town Departments
Boards, Commissions, and Committees	5	All Town Boards, Commissions, and Committees
Ordinances	19	Ordinances that may include or need accessibility related language
Communication Services	3	All methods the Town uses to communicate with the public
Documents	109	Includes all information referenced on the Town's website
Events, Programs, Services and Activities	28	
Forms	83	
Videos	20	
Standards	7	

3.3 Existing Facility Inventory

The first step in completing a Self-Evaluation for facilities is understanding what facilities the Town owns or is responsible for maintaining and where each of these facilities is located. The Town completed a facility inventory in 2023 and the results are documented in the following sections.

3.3.1 Buildings

Table 2 is a list of all Town of Highland Park-owned buildings with public access.

Table 2. Summary of Buildings to be Reviewed

Building Name	Building Address
1. Town Hall	4700 Drexel Drive
2. Municipal Court	4700 Drexel Drive
3. Police Department	4700 Drexel Drive
4. Harvey R “Bum” Bright Library	4700 Drexel Drive
5. Service Center	5005 Holland Avenue

All buildings with public access will be evaluated for compliance with the applicable ADA Standards 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. Approximately 0.2 miles of on-site sidewalk and all associated curb ramps, ramps, stairs, and other paths of travel required to be ADA compliant will also be evaluated.

3.3.2 Parks

Table 3 is a list of all Town of Highland Park-owned parks.

Table 3. Summary of Parks to be Reviewed

Park Name	Park Address
1. Abbott Park	4814 Abbott Avenue
2. Connor Park	4301 St. Johns Drive
3. Davis Park	4500 Drexel Drive
4. Douglas Park	4500 Douglas Avenue
5. Fairfax Park	4524 Beverly Drive
6. Flippen Park	4421 N. Versailles Avenue
7. Lakeside Park	4601 Lakeside Drive
8. Prather Park	4500 Drexel Drive

All existing parks will be evaluated for compliance with the applicable ADA Standards including parking lots, path of travel from the parking lot to the park amenities, access into facilities, signage, drinking fountains, and restrooms. Approximately three (3) miles of on-site sidewalk and all associated curb ramps, ramps, stairs, pedestrian bridges, and other paths of travel required to be ADA compliance will also be evaluated. The Town maintains nine (9) pedestrian bridges within these parks.

3.3.3 Signalized Intersections

The Town of Highland Park owns and maintains 14 signalized intersections. Signalized intersection evaluations will be evaluated for compliance with PROWAG based on the conditions and measurements along the pedestrian street crossings, curb ramps, pedestrian signal equipment, and adjacent clear spaces.

3.3.4 Sidewalk Corridors

Using aerial imagery, the Town developed a GIS-based inventory of Town-owned sidewalk corridors. Based on the inventory, the Town of Highland Park is responsible for approximately 78 miles of sidewalk corridors, including pedestrian street and driveway crossings. There are approximately 237 unsignalized intersections and approximately 28 driveways along the Town-owned sidewalk corridors.

All Town-owned 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 street crossings, and pedestrian driveway crossings. 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, Section 35.150, Existing Facilities, requires that the Transition Plan include a schedule for providing curb ramps or other sloped area 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 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 other barriers at intersections to streets, roads, or highways.”

3.3.5 Facility Inventory Summary

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

- 5 buildings;
- 8 parks, including 9 pedestrian bridges;
- 14 signalized intersections;
- 78 miles of sidewalk corridors, including 237 unsignalized intersections and 28 driveways along the sidewalk corridors.

3.4 Self-Evaluation Action Plan

The FHWA has provided guidance on the ADA Transition Plan process in their “INFORMATION: ADA Transition Plans” memo dated June 27, 2019. A copy of the memo is also available on the FHWA website:

https://www.fhwa.dot.gov/civilrights/memos/ada_transition_plans_062719.cfm. While this memo specifically addresses state departments of transportations, 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, PROWAG).

The Town of Highland Park has compiled a list of all Town-owned and/or maintained facilities to be evaluated for compliance with applicable ADA Standards and PROWAG. The Town's Action Plan to complete the evaluation of these facilities will be completed an estimated three (3) year period and updates to the Town's Transition Plan will be made to including observations and possible solutions to remove identified barriers.

3.5.1 Town of Highland Park Self-Evaluation Action Plan

The second step in completing a Self-Evaluation is developing an Action Plan to evaluate all existing buildings, parks, signalized intersections, and sidewalk corridors (including pedestrian street and driveway crossings) based on the applicable ADA Standards and PROWAG. This Action Plan should include the identification of evaluation criteria, the development of evaluation methodology and reporting output, and a schedule to complete the evaluations. Best practices for each of these items are detailed in the following sections. Once an Action Plan has been developed, the existing facility Self-Evaluations should be started.

Evaluation Criteria

For each facility type, the following elements should be evaluated for consistency with applicable ADA Standards and PROWAG.

Evaluation Methodology

Several technologies are currently available to aid in the data collection process. At a minimum, it is recommended that the equipment used to collect the data be capable of the following:

- Measuring slopes to the nearest tenth of a percent;
- Measuring sidewalk, curb ramp, and crosswalk dimensions to the nearest inch;
- Measuring cross street widths, driveway widths, and sidewalk segment lengths to the nearest foot;
- Isolating the measurements for each element listed in the applicable ADA Standards and PROWAG;
- Output should be available in GIS shapefile format with geospatially referenced photos of evaluated elements.

Reporting Capabilities

When selecting a technology to aid with data collection, the Town should take into consideration whether a reporting system has been developed to process the raw data. For the data to be readily usable by the Town for developing their Townwide ADA Transition Plan, the reporting system should provide the following output:

- Compliance status of each element evaluated based on the applicable ADA Standards and PROWAG;
- Possible solution to remove any barriers and bring the element into compliance;
- Estimated cost of possible solution; and
- Prioritization of the individual facility, independent of other locations of the same facility type.

The Town should also establish a working database that will allow staff to track and monitor progress as projects are implemented and barriers are removed. The database should also allow staff to report progress by facility type on a periodic basis, which could be used in support of any mobility related performance metrics.

The progress monitoring database should incorporate existing Town programs currently in place to implement ADA improvements, including:

- Bringing required elements into ADA compliance during road reconstructions and widenings;
- Bringing required elements into ADA compliance as new developments are constructed;
- Reviewing design plans for all new facilities to ensure ADA required elements are included and designed to meet the ADA standards; and
- Inspecting all new construction to ensure facilities were built per the design plans.

There is not a one size fits all solution to progress monitoring and the Town should make a citywide collaborative effort to understand what existing Town project information needs to be integrated with the ADA Self-Evaluation reporting data, or vice versa, to make the progress monitoring useable by Town staff in maintaining the Town's ADA Transition Plan.

Phased Self-Evaluation Approach

The deadline set by DOJ to have a Townwide ADA Transition Plan completed, including the Self-Evaluations, was January 26, 1992. Therefore, the Self-Evaluation of existing facilities should be completed as soon as practical. The DOJ does not have any requirements or guidelines on how to prioritize which facilities should be evaluated first if the Town plans to phase the data collection over time. Ultimately, all facilities must be evaluated for an agency's ADA Transition Plan to be complete.

However, minimizing risk for litigation and risk for pedestrians should be the goal when determining the order in which to evaluate facilities. Several factors can increase risk at a location, including:

- **Number of existing complaints** – Locations with complaints have already been identified by the public as problem areas and should be evaluated as soon as possible to determine if the area(s) of concern are in compliance.
- **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, 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 issue that may be contributing to the crashes (e.g., a push button is not within the required reach range, so pedestrians are not activating the button and crossing the street without a protected phase).
- **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.
- **Street 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 activations as a signalized intersection.
- **Existing sidewalks** – The ADA does not require sidewalks to be installed, but existing sidewalks must be compliant, and the accessible route 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 no improvements are made where an issue exists.

There are also other factors to take into consideration, such as:

- **Spatial distribution of facilities** – Selecting facilities to be evaluated evenly across different areas of the Town might be more well-received by the public, assuming all the risk factors above are equal.
- **Facility type** – Selecting a variety of different facilities (e.g., public rights-of-way, buildings, parks) to be evaluated during each phase, instead of all of the same facility type, may provide a better understanding of different types of issues that may exist.
- **Upcoming Capital Improvement Program (CIP) Projects** – 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 Self-Evaluation Action Plan. The Action Plan may be modified as needed during and in between Self-Evaluation phases to account for lessons learned or budget changes.

3.6 Schedule and Implementation Methods

It is acceptable for the Town 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. The Town should determine and document in the Transition Plan the anticipated number of years required to complete the Self-Evaluation of Town programs, services, activities, and facilities identified in **Section 3.2 Program, Services, and Activities Inventory** and **Section 3.3 Existing Facility Inventory**.

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 Town of Highland Park 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 should be provided for each facility with identified compliance issues. **Table 4**, **Table 5**, and **Table 6** provide proposed prioritization criteria for buildings/parks, intersections (both signalized and unsignalized), and sidewalk corridors. All compliance elements included in the prioritization schedule are based on requirements from the ADA Standards and PROWAG. While every effort will be made to design and implement improvements to be consistent with the ADA Standards and PROWAG, the Town will provide access to the maximum extent feasible where full compliance is technically infeasible. The 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., safety concern) 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 is recommended to be collected during the Self-Evaluation, all data needed for prioritization should already be contained in the database with the exception of known complaints and proximity to pedestrian attractors. To streamline the prioritization of each facility, the proximity to pedestrian attractors should be collected when the elements contained within the applicable ADA Standards and PROWAG are evaluated.

Sidewalk corridors include the entire pedestrian path of travel, including sidewalk, pedestrian street crossings, and pedestrian driveway crossings. 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 pedestrian street crossings 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, any missing sidewalk segments will be given a low priority.

To determine the priority for each facility, raw compliance data should be compared to the criteria in **Table 4**, **Table 5**, and **Table 6**. 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 evaluated facilities.

This priority is just one factor that can be used to determine the order in which facilities are remediated. Other considerations may be similar to the factors listed in **Section 3.5.1 Town of Highland Park Self-Evaluation Action Plan, Phased Self-Evaluation Approach**.

3.7.1 Prioritization Factors for Facilities

Buildings and parks will be prioritized on a 5-point scale, which is defined in **Table 4**. This prioritization methodology was developed by the Consultant Team to aid the Town in determining how the building should be prioritized for improvements based on the priorities recommended by the DOJ regulations for barrier removal. The purpose of these priorities, per the DOJ, is to facilitate long-term business planning and to maximize the degree of effective access that will result from any given level of expenditure. The DOJ priorities are a recommendation only and are not mandatory.

Signalized and unsignalized intersections will be prioritized on a 13-point scale, which is defined in **Table 5**. This prioritization methodology was developed by the Consultant Team to aid the Town in determining which unsignalized intersections should be prioritized for improvements over other unsignalized intersections based on the severity of non-compliance with ADA.

Sidewalk corridors will be prioritized on a 3-point scale and are given a priority of "High", "Medium", or "Low" based on the severity of non-compliance, which is defined in **Table 6**. Compliant segments of the sidewalk corridor will be given a priority label of "Compliant".

Table 4. Prioritization Factors for Buildings/Parks

Priority	Criteria
1 (high)	Complaint known or safety concern
2	Issues with accessible approach and entrance (DOJ Priority 1)
3	Issues with access to goods and services (DOJ Priority 2)
4	Issues with access to public restrooms (DOJ Priority 3)
5 (low)	Issues with other measures to provide access to goods and services (DOJ Priority 4)

Table 5. Prioritization Factors for Signalized and Unsignalized Intersections

Priority	Criteria
1 (high)	Complaint filed on curb ramp or intersection
2 (high)	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> • 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)	<ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> • 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)	<ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> • Cross slope > 5% • Width < 36 inches • Median/island crossings that are inaccessible
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

Table 6. Prioritization Factors for Sidewalk Corridors

Criteria	Priority 1 (high)	Priority 2 (medium)	Priority 3 (low)
Cross slope of sidewalk is greater than 2%	Value > 3.5%	3.5% ≥ Value > 2.0%	
Width of sidewalk is less than 48 inches	Value ≤ 36.0"	36.0" < Value < 42.0"	42.0" < Value < 48.0"
Obstruction present along sidewalk	Obstruction - Permanent	Obstruction - Temporary	
Heaving, sinking, or cracking present on sidewalk	Heaving Sinking Cracking		
Ponding on sidewalk		Ponding	
Missing sidewalk			Missing Sidewalk
Signalized cross street cross slope is greater than 5%	Value > 9.0%	9.0% ≥ Value ≥ 7.0%	7.0% > Value > 5.0%
Unsignalized cross street cross slope is greater than 2%	Value > 6.0%	6.0% ≥ Value ≥ 4.0%	4.0% > Value > 2.0%
Cross street running slope is greater than 5%	Value > 7.0%	7.0% ≥ Value ≥ 6.0%	6.0% > Value > 5.0%
Driveway sidewalk width is less than 48 inches	Value ≤ 36.0"	36.0" < Value < 42.0"	42.0" < Value < 48.0"
Driveway (or sidewalk if applicable) cross slope is greater than 2%	Value > 6.0%	6.0% ≥ Value ≥ 4.0%	4.0% > Value > 2.0%
Driveway (or sidewalk if applicable) condition is poor or a safety concern	Elevation change greater than 1/2 inch or gaps greater than 1 inch	Elevation change between 1/4 inch and 1/2 inch or gaps between 1/2 inch and 1 inch	
Railroad crossing excessive sidewalk vertical discontinuity	Elevation change greater than 1/4 inch or gaps greater than 1 inch)		
Railroad crossing prefabricated plate is plastic or does not exist	Yes – Plastic or No		
Railroad crossing flangeway gap > 3 inches (freight) or flangeway gap > 2.5 inches (non-freight)	Value > 3.0" (freight) or 2.5" (non-freight)		
Railroad crossing is missing detectable warning surface(s)	No – Neither Side or Yes – 1 Side Only		

3.8 Action Log

As the facility and PSA evaluations are completed, the Town will institute an ADA Action Log to confirm follow-up on corrective actions required under the Transition Plan and documenting Town 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. The ADA Action Log will be updated on an annual basis and should be available to the public upon request.

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4.0 Funding Opportunities

Several alternative funding sources are available to the Town 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.

4.1 Federal and State Funding

There is federal and state funding available for the Town to apply for through numerous agencies for various improvements. 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 Town of Highland Park is not guaranteed to receive these funds. It will be important for the Town 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.

4.2 Local Funding

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

- North Central Texas Council of Governments (NCTCOG) funding
- TxDOT funding
- Dallas County Major Capital Improvement Program (MCIP)
- 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 issue)
- 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) 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 municipalities 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 Reinvestment Zone
- Transportation User Fee / Street Maintenance Fee

4.3 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 Town to require private developers to improve pedestrian facilities to current ADA requirements, whether it by new development or redevelopment of an existing property.

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5.0 Conclusion and Next Steps

This document serves as the Americans with Disabilities Act (ADA) Transition Plan for the Town of Highland Park. The Town intends to complete the Self-Evaluation of programs, services, activities, and facilities identified in this document over the next three (3) years. The Town will make an effort to increase the annual Self-Evaluation budget in future years to potentially shorten the anticipate completion schedule.

The next steps for the Town of Highland Park are:

1. Develop an Action Plan for completing a Self-Evaluation for all Town programs, services, activities, and facilities.
2. Complete a Self-Evaluation for all Town 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 applicable ADA Standards 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 Town's ADA Transition Plan after each additional phase.
5. Continue to update the Town's ADA Transition Plan as projects are implemented and resident requests/complaints are received.
6. Determine the best approach for receiving public input on the ADA Transition Plan.