



City of Dallas  
**ADA Self-Evaluation &  
Transition Plan**

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Prepared by:

**Kimley»Horn**

801 Cherry Street  
Unit 11, Suite 1300  
Fort Worth, Texas 76102

In Association with:





# Table of Contents

<b>Abbreviations</b> .....	<b>iii</b>
<b>1.0 Introduction</b> .....	<b>1</b>
1.1 Legislative Mandate.....	1
1.2 ADA Self-Evaluation and Transition Plan Development Requirements and Process .....	1
1.3 Discrimination and Accessibility.....	1
1.3.1 Physical Barriers .....	2
1.3.2 Programmatic Barriers .....	2
1.3.3 Previous City of Dallas Efforts.....	2
1.3.4 Ongoing Accessibility Improvements .....	2
1.3.5 City of Dallas Approach.....	2
1.4 Exceptions and Exemptions .....	3
<b>2.0 Public Outreach</b> .....	<b>5</b>
<b>3.0 Self-Evaluation and Summary of Findings</b> .....	<b>3</b>
3.1 Programs, Procedures, and Policies Review .....	3
3.1.1 ADA/504 Manager (Title II) .....	4
3.1.2 Roles and Responsibilities of the ADA/504 Manager.....	4
3.1.3 ADA Grievance Policy, Procedure, and Form with Appeals Process for the ADA (Title II) ...	5
3.1.4 Public Notice Under the ADA .....	6
3.1.5 ADA Liaison Committee .....	8
3.1.6 Website Accessibility Review.....	9
3.2 Program, Services, and Activities Inventory .....	9
3.3 Facilities Review .....	11
3.3.1 Buildings.....	11
3.3.2 Public Rights-of-Way Facilities.....	13
3.4 Maintenance Versus Alterations .....	15
3.5 FHWA Guidance on Closing Pedestrian Crossings.....	17
3.6 Prioritization.....	17
3.7 Action Log .....	17
<b>4.0 Staff Training</b> .....	<b>19</b>
<b>5.0 Facility Costs</b> .....	<b>21</b>
5.1 Facilities Cost Projection Overview .....	21
5.2 Implementation Schedule .....	22
5.3 Funding Opportunities .....	22
5.3.1 Federal and State Funding.....	22
5.3.2 Local Funding.....	23
5.3.3 Private Funding .....	23
<b>6.0 Next Steps</b> .....	<b>25</b>



**Appendix** ..... 27

- Appendix A: City of Dallas ADA Compliance Plan
- Appendix B: City of Dallas Registered Historic Places
- Appendix C: ADA Focus Group Meeting Notes
- Appendix D: City of Dallas Roles and Responsibilities of the ADA/504 Manager
- Appendix E: Website Review
- Appendix F: Programs, Services, and Activities Inventory
- Appendix G: Facility Reports
- Appendix H: ADA Action Log

## List of Tables

**Table 1. Summary of Buildings Reviewed** ..... 12

**Table 2. Summary of Buildings (Future Evaluations)** ..... 13

**Table 3. Summary of Curb Ramp Issues** ..... 14

**Table 4. Summary of Sidewalk Issues** ..... 14

**Table 5. Prioritization Factors for Buildings** ..... 18

**Table 6. Summary of Facility Costs** ..... 21

**Table 7. Funding Opportunities** ..... 24

## List of Figures

**Figure 1. Maintenance versus Alteration Projects** ..... 16



## Abbreviations

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ADA – Americans with Disabilities Act

CIP – Capital Improvement Program

DOJ – United States Department of Justice

FHWA – Federal Highway Administration

PROWAG – Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way

PSA – Programs, Services, and Activities

WCAG – Web Content Accessibility Guidelines



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## 1.0 Introduction

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### 1.1 Legislative Mandate

The Americans with Disabilities Act (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 City of Dallas has undertaken a comprehensive evaluation of its PSAs to determine the extent that individuals with disabilities may be restricted in their access.

### 1.2 ADA Self-Evaluation and Transition Plan Development Requirements and Process

The City of Dallas 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 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (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 Dallas' 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 10 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.

### 1.3 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:

### 1.3.1 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

### 1.3.2 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

### 1.3.3 Previous City of Dallas Efforts

The City of Dallas initially developed an ADA Transition Plan in 1992 as well as an ADA Compliance Plan in 1993. As part of the 1992 ADA Transition Plan, the City evaluated 200 City-owned buildings with public access. A policy regarding the installation of curb ramps was also established. As part of the 1993 ADA Compliance Plan 103 Parks and Recreation facilities were evaluated including 41 recreation centers, six (6) tennis courts, five (5) golf courses, 18 miscellaneous facilities, seven (7) White Rick Lake facilities, and 26 swimming pools. After 1992, ADA standards for new construction were incorporated into City improvement plans. A copy of the City of Dallas ADA Compliance Plan is provided in **Appendix A**.

### 1.3.4 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.

### 1.3.5 City of Dallas Approach

The purpose of the Transition Plan is to provide the framework for achieving equal access to the City of Dallas' PSAs 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 Dallas residents seek to enjoy, and guides future improvements. This Plan has been prepared after inventorying all City's programs, services, activities, and evaluations of a select number of City facilities.

The City of Dallas will 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 Dallas will not place surcharges on individuals with disabilities to cover the cost involved in making PSAs accessible.

## 1.4 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 under this chapter; (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. A list of registered historic places within the City of Dallas is provided in **Appendix B**. This list is 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>), but there may be other documentation available not provided on these websites.

The City has established a Historic Preservation section. The Historic Preservation section provides services related to historic districts, historic structures, and potential historic districts and structures. These services include Landmark (historic) Designation, Certificates of Appropriateness (approval forms for work on landmark structures), and administering tax incentive programs within Historic Districts and on individual Historic Structures. The Historic Preservation section 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.





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## 2.0 Public Outreach

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The City established an external ADA Focus Group consisting of representatives from local disability organizations. Local organizations that were contacted for participation included:

- Abundant Life HCS
- Achieve DFW
- Achievement Center of Texas
- ADAPT of Texas - Austin Office / State Office
- Aids Service of Dallas
- American Cancer Society
- ARC of Texas
- Arthritis Foundation
- Association for Independent Living (AFIL)
- Callier Center UT Dallas
- Camp Craig Allen
- Camp Summit
- Chase's Place
- Child Study Center Cook Children's
- Coalition of Texans with Disabilities
- Community Homes for Adults, Inc. (Chai)
- Dallas Center for Developmentally Disabled
- Dallas Services
- Dallas Wheelchair Tennis Club
- Deaf Action Center
- Disability Rights - Central Texas
- Down Syndrome Guild of Dallas
- Easter Seals of Greater Dallas
- Envision Dallas
- Goodwill Industries Dallas
- Jewish Family Service of Greater Dallas
- Lonestar Paralyzed Veterans of America
- Metrocare
- Metroplex Adaptive Water Sports
- MOSAIC of Dallas
- Parkland Hospital
- Prevent Blindness Texas
- Public participant
- Reach of Dallas
- Resource Center Dallas
- Rise Adaptive Sports
- The Senior Source
- Turning Point Nation
- William Brown Consulting

The City hosted an ADA Focus Group meeting with representatives from some of these organizations on Wednesday, July 1, 2020 at 10:00 AM, to provide a summary of the transition planning process, receive feedback on any concerns related to accessibility, and determine who will serve on the ADA Advisory Committee. The ADA Focus Group meeting notes are provided in **Appendix C**.

The ADA Focus Group was also provided an opportunity to review and provide comments on the draft Transition Plan. Comment received are summarized below.

- Based on current conditions, I see physical barriers along public rights-of-way sidewalk corridors as a major obstacle. Restoring strong and effective interdepartmental and interagency working groups and an effective solutions task force with the authority and the budget to act would appropriately address this issue.
- Require Public Works to hold mandatory bid conferences on all sidewalk, curb, ramp, and gutter contracts and ensure that ADA specifications are covered and not lost in the 200+ pages of the standard specifications that most winning bidders do not read.
- Solicit feedback from groups like Preservation Oak Cliff and the Dallas Homeowners League, the Dallas Chapter of the American Association of Architects, and the Oak Lawn Committee.



The City will continue to solicit feedback from the ADA Focus Group on the Transition Plan.

The Sidewalk Master Plan will include a Public Engagement Plan (PEP) for the community and stakeholder outreach and a strategy for communication. This plan will incorporate outreach and engagement methods that foster meaningful participation and provide needed input for the successful development and implementation of the Dallas Sidewalk Master Plan. In addition, the Public Engagement Plan (PEP) will identify the method to encourage and communicate with historically underrepresented population.

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## 3.0 Self-Evaluation and Summary of Findings

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The City of Dallas' Americans with Disabilities Act (ADA) Transition Plan will include the results of a comprehensive review of the programs, services, and activities provided to employees and the public. The Plan will also include the findings from facility evaluations of select City-owned facilities.

### 3.1 Programs, Procedures, and Policies Review

Under the ADA, the City of Dallas 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 provided to produce 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, services, 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 can only be made by the ADA/504 Manager and/or an authorized designee of the City, such as the City Manager or his/her 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 Manager (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.

#### ADA/504 Manager (Title II): Self-Evaluation Findings

The City of Dallas has appointed Gary Copeland as ADA Manager. Below is his contact information, which is posted on the City website; however, the ADA Compliance webpage references the “City of Dallas ADA Coordinator”, not the “ADA Manager”.

Gary Copeland, ADA Manager  
Office of Fair Housing and Human Rights  
1500 Marilla Street, Room 1BN  
Dallas, TX 75201  
Office: 214-671-5228  
Relay: 1-800-735-2988 or 7-1-1  
Gary.Copeland@dallascityhall.com

#### ADA/504 Manager (Title II): Possible Solutions

Gary Copeland was recently appointed as the ADA/504 Manager. The ADA/504 Manager contact information must be provided to interested parties. The following distribution methods are recommended:

- 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;
- Provide in materials that are distributed by the City where ADA questions or concerns may arise; and
- Post on the City website.

The City should revise the text on the ADA Compliance webpage (<https://dallascityhall.com/departments/fairhousing/Pages/ADA-Compliance.aspx>) to reference the “ADA Manager” instead of the “City of Dallas ADA Coordinator” to clarify the correct point-of-contact.

### 3.1.2 Roles and Responsibilities of the ADA/504 Manager

Below is a list of qualifications for ADA Managers 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.

#### Roles and Responsibilities of the ADA/504 Manager: Self-Evaluation Findings

No information regarding the roles and responsibilities of the ADA/504 Manager is provided on the City's website or in City documents.

#### Roles and Responsibilities of the ADA/504 Manager: Possible Solutions

These roles and responsibilities of the ADA/504 Manager were developed in April 2020. See **Appendix D** for a copy of the Roles and Responsibilities for the ADA/504 Manager.

### 3.1.3 ADA Grievance Policy, Procedure, and Form with Appeals Process for the ADA (Title II)

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. Neither Title II nor its implementing regulations describe what ADA grievance procedures must include; however, the U.S. Department of Justice 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.

#### ADA Grievance Policy, Procedure, and Form with Appeals Process for the ADA (Title II): Self-Evaluation Findings

The City of Dallas ADA Title II Complaint/Grievance Process is posted on the City's ADA Compliance website (<https://dallascityhall.com/departments/fairhousing/Pages/ADA-Compliance.aspx>). The complaint/grievance policy and procedure does not include the following elements suggested by the Department of Justice (DOJ):

- Timeline indicating that the complaint should be submitted by the grievant and/or his/her designee as soon as possible but no later than 60 calendar days after the alleged violation.
- Detailed contact information for the ADA/504 Manager and the City Manager's Office is not provided in the text of the actual policy and procedure.
- The ADA/504 Manager contact information is missing the Texas Relay number.
- ADA Compliance webpage references the "ADA Coordinator", not the "ADA Manager".

The City added an ADA grievance form to the Dallas 3-1-1 website (<https://dallascrm.force.com/public/servicetypes>) in October 2020 to help facilitate the complaint/grievance process online.



### ADA Grievance Policy, Procedure, and Form with Appeals Process for the ADA (Title II): Possible Solutions

- Add text indicating the complaint should be submitted by the grievant and/or his/her designee as soon as possible but no later than 60 calendar days after the alleged violation.
- Provide detailed contact information for the ADA/504 Manager and the City Manager's Office within the text of the actual policy and procedure. This will also allow the policy and procedure text to be used as a standalone document when an alternate format is requested.
- Add the Texas Relay number to the ADA/504 Manager contact information.
- Revise the ADA Compliance webpage text to reference the "ADA Manger" instead of the "City of Dallas ADA Coordinator" to clarify the correct point-of-contact.

In addition to being posted on the City's website (<https://dallascityhall.com/departments/fairhousing/Pages/ADA-Compliance.aspx>), the City of Dallas ADA Title II Complaint/Grievance Process should be distributed to all City leadership and posted in public spaces of public buildings.

#### 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 programs, services, and activities. This notice is required to include information regarding Title II of the ADA and how it applies to the programs, services, and activities of the public entity. 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 Manager. 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.

#### Public Notice Under the ADA: Self-Evaluation Findings

The City of Dallas Notice Under the Americans with Disabilities Act is not posted on the City's website. The notice includes information regarding employment, effective communication, modifications to policies and procedures, requests, and complaints. However, this information does not include the following language recommended by the DOJ.





## Public Notice Under the ADA: Self-Evaluation Findings (cont.)

- The City's notice introduction states, "The City of Dallas does not discriminate on the basis of disability in its services, programs, or activities."

However, DOJ's recommended language is as follows, "In accordance with the requirements of title II of the Americans with Disabilities Act of 1990 ("ADA"), the City of Dallas will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities."

- The City provides language regarding modifications to policies and procedures such as, "The City of Dallas will make reasonable modifications to **policies and procedures** to ensure that people with disabilities have an equal opportunity to enjoy programs, services, and activities. For example, people with service animals are welcomed in The City of Dallas offices, even where pets and other animals are prohibited."

However, DOJ recommends slightly different language as follows, "City of Dallas will make all reasonable modifications to **policies and programs** to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, and activities. For example, individuals with service animals are welcomed in City of Dallas offices, even where pets are generally prohibited."

- The City provides a "Requests" section that states, "To request an auxiliary aid or service for effective communication, or a modification of policies or procedures contact Gary Copeland, ADA Manager at 214-671-5228 (Texas Relay: 1-800-735-2988 or 7-1-1) or Gary.Copeland@dallascityhall.com as soon as possible, **preferably 14 days before the activity or event.**"

However, the DOJ recommends the following language, "Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of City of Dallas, should contact the office of Gary Copeland, ADA Manager at 214-671-5228 (Texas Relay: 1-800-735-2988 or 7-1-1) or Gary.Copeland@dallascityhall.com as soon as possible but no later than **48 hours before the scheduled event.**"

The ADA does not require the City of Dallas to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

Complaints that a program, service, or activity of City of Dallas is not accessible to persons with disabilities should be directed to Gary Copeland, ADA Manager at 214-671-5228 (Texas Relay: 1-800-735-2988 or 7-1-1) or Gary.Copeland@dallascityhall.com.

City of Dallas will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to persons who use wheelchairs.



### Public Notice Under the ADA: Possible Solutions

Below is sample language provided by the DOJ that should be added to the existing City notice related to modification to policies and procedures:

- In accordance with the requirements of title II of the Americans with Disabilities Act of 1990 ("ADA"), the City of Dallas will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.
- City of Dallas will make all reasonable modifications to **policies and programs** to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, and activities. For example, individuals with service animals are welcomed in City of Dallas offices, even where pets are generally prohibited.
- Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a program, service, or activity of City of Dallas, should contact the office of Gary Copeland, ADA Manager at 214-671-5228 (Texas Relay: 1-800-735-2988 or 7-1-1) or Gary.Copeland@dallascityhall.com as soon as possible but no later than **48 hours before the scheduled event**. The ADA does not require the City of Dallas to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.
- Complaints that a program, service, or activity of City of Dallas is not accessible to persons with disabilities should be directed to Gary Copeland, ADA Manager at 214-671-5228 (Texas Relay: 1-800-735-2988 or 7-1-1) or Gary.Copeland@dallascityhall.com.
- The City of Dallas will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to persons who use wheelchairs.

This notice should be adopted by the City, posted on the web, and publicized in common areas that are accessible to all employees and areas open to the public. The U.S. Department of Justice guidelines can be found here: <https://www.ada.gov/pcatoolkit/chap2toolkit.htm>.

#### 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 Manager to resolve issues regarding the needs of their department and the programs under their management. The ADA/504 Manager works closely with the ADA Liaison Committee to coordinate the implementation of plans, programs, policies, and procedures.



### ADA Liaison Committee: Self-Evaluation Findings

The City of Dallas has established an ADA Liaison Committee and is comprised of a representative from each City department. These representatives are tasked with serving as the ADA contact for their department and will consult with the ADA/504 Manager regarding all ADA issues impacting their department. Each representative is responsible for keeping a detailed log for all ADA inquiries within their department. This log shall be shared with the ADA/504 Manager and shall be retained for at least three (3) years.

### ADA Liaison Committee: Possible Solutions

The ADA Liaison Committee information should be publicized in common areas that are accessible to employees and areas open to the public. This includes posting this information on the City website.

### 3.1.6 Website Accessibility Review

Web pages for the City of Dallas Fire & Rescue Department and for the City of Dallas Office of Emergency Management were evaluated against the Web Content Accessibility Guidelines (WCAG), Version 2.1, Levels A and AA. WCAG is the global standard, developed by members of the World Wide Web Consortium (W3C). W3C is an international community where Member organizations, a full-time staff, and the public work together to develop Web standards. The two web pages were tested using a wide variety of browsers, devices, and assistive technologies - including screen readers.

### Website Accessibility Review: Self-Evaluation Findings

These pages contained significant barriers that could prevent equal access to information and function by people with disabilities. The findings are arranged by issue and each issue references the applicable WCAG guideline(s).

The bulk of the issues will have an impact on keyboard-only users, sighted or not, and on people with low vision. A complete list of findings is provided in **Appendix E**.

### Website Accessibility Review: Possible Solutions

A complete list of possible solutions is provided in **Appendix E**.

## 3.2 Program, Services, and Activities Inventory

The City of Dallas has compiled a list of all City programs, services, and activities (PSAs) required to be reviewed for compliance with Title II of the ADA. The City 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 City's Transition Plan will be made to including findings and possible solutions for identified barriers.



Complete lists of the following are provided in the referenced appendices:

- Boards, commissions, committees, and councils (**Appendix F-1**);
- Departments and offices (**Appendix F-2**);
- Policies, procedures, and guidelines (**Appendix F-3**);
- Documents, forms, and videos (**Appendix F-4**);
- Events, meetings, programs, services, activities (**Appendix F-5**); and
- Ordinances (**Appendix F-6**).

#### Codes

The City of Dallas has adopted the 2015 International Building Code (IBC) with City of Dallas amendments as indicated on the City's webpage:

[https://dallascityhall.com/departments/sustainabledevelopment/buildinginspection/Pages/construction\\_codes.aspx](https://dallascityhall.com/departments/sustainabledevelopment/buildinginspection/Pages/construction_codes.aspx).

The City is not responsible for reviewing the 2015 IBC; however, the City amendments to the 2015 IBC should be evaluated for consistency with the 2010 ADA Standards for Accessible Design.

#### Design Standards

The following City standards should be evaluated for consistency with the 2010 ADA Standards for Accessible Design and 2011 PROWAG. The standards are provided on the City website:

<https://dallascityhall.com/departments/sustainabledevelopment/Engineering/Pages/engineering-forms.aspx>

- North Central Texas Standard Specification Addendum
- Pavement Cut and Repair Standards Manual
- Design Manual
- Paving Design Manual
- Off-Street Parking and Driveways Handbook
- Construction Details
- Standard Construction Details – with Signatures
- DWU – Design and Construction Standards
- Development Design Procedure and Policy Manual
- Trench Repairs Ordinance 26263

#### Emergency Operations Plan

The following documents should be evaluated for employee evacuation and emergency operations for consistency with current accessibility requirements and standards.

- City of Dallas Emergency Operations Basic Plan
- Dallas Emergency Response Plan 2020 Update
- Downtown Dallas Emergency Response Plan



The City does not have policies, procedures, or guidelines related to the following and should consider the development of these documents:

- Reasonable Accommodation Request Policy, Procedure, and Request Form;
- Service Animal Guidance for Reasonable Accommodations;
- Reasonable Modification Request Policy, Procedure, and Request Form;
- Service Animal Guidance for Reasonable Modifications in Public Places;
- ADA Grievance Procedure and Grievance Form with Appeals Process for Section 508 of the Rehabilitation Act Retaliation or Coercion Policy;
- Non-Discrimination Statement Policy;
- ADA Assurance;
- Alternate Format Policy, Procedure, and Request Form;
- Policies and Procedures for ADA Transition Plan Updates and Corrections (Title I/Title II);
- Review of Previous ADA Complaint Log and Summary (Title I and II);
- Entity-Wide ADA Training; and
- Community Disability Organization Listing.

### 3.3 Facilities Review

#### 3.3.1 Buildings

Twenty-two (22) buildings within the City of Dallas were evaluated in 2020. All buildings included in the evaluation are listed in **Table 1**. All buildings that will be evaluated during future Self-Evaluation phases are listed in **Table 2**.

*[The remainder of this page intentionally left blank.]*



**Table 1. Summary of Buildings Reviewed**

Buildings	
1. Arcadia Park Library	1302 N Justin Ave.
2. Campbell Green Recreation Center	16600 Park Hill Dr.
3. Dallas City Hall	1500 Marilla St.
4. Dallas Municipal Court	2014 Main St.
5. Eddie Bernice Johnson Union Station	400 S Houston St.
6. Fretz Tennis Center	6998 Belt Line Rd.
7. J. Erik Jonsson Central Library	1515 Young St.
8. KBH Convention Center	650 S Griffin St.
9. Kleberg Rylie Recreation Center	1301 Edd Rd.
10. Majestic Theater	1925 Elm St.
11. Martin Luther King Jr. Center Recreation Center	2922 Martin Luther King Jr. Blvd.
12. Martin Luther King Jr. Center Administration	2922 Martin Luther King Jr. Blvd.
13. Martin Luther King Jr. Child Care	2922 Martin Luther King Jr. Blvd.
14. Martin Luther King Jr. Clinic	2922 Martin Luther King Jr. Blvd.
15. Martin Luther King Jr. Library	2922 Martin Luther King Jr. Blvd.
16. Martin Luther King Jr. Parking Lot	2922 Martin Luther King Jr. Blvd.
17. Mildred Dunn Recreation Center	3322 Reed Ln.
18. Moody Performance Hall (Exterior Only)	2520 Flora St.
19. NE Patrol Station	9915 E Northwest Hwy
20. Polk-Wisdom Library	7151 Library Ln.
21. South Dallas Cultural Center	3400 S. Fitzhugh Ave.
22. SW Patrol Station	4230 W Illinois Ave.



**Table 2. Summary of Buildings (Future Evaluations)**

Buildings	
1. Oak Cliff Municipal Center	320 E Jefferson Blvd.
2. Dallas Museum of Art	1717 N Harwood St.
3. Music Hall (Fair Park)	909 1st Ave.
4. Hall of State (Fair Park)	3939 Grand Ave.
5. Juanita Craft Home	2618 Warren Ave.
6. Oak Cliff Cultural Center	223 W Jefferson Blvd.
7. Latino Cultural Center	2600 Live Oak St.
8. Bath House Cultural Center	521 E Lawther Dr.
9. Dallas Heritage Village	1515 S Harwood St.
10. African American Museum	3536 Grand Ave.
11. Dallas Black Dance Theatre	2700 Ann William Way
12. Skyline Branch Library	6006 Everglade Rd.
13. Oak Lawn Branch Library	4100 Cedar Springs Rd.
14. Eloise Lundy Rec Center	1229 Reverend CBT Smith St.
15. Morton H Myerson Symphony Center	2301 Flora St.
16. West Dallas Multipurpose Center	2828 Fish Trap Rd.

Buildings: Self-Evaluation Findings

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 G**). Common issues identified included:

- Non-compliant accessible parking
- Non-compliant routes from accessible parking to accessible entrances
- Non-compliant public interaction spaces (transaction counters, etc.)
- Non-compliance restrooms and drinking fountains

Buildings: Possible Solutions

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

*[Remainder of page intentionally left blank]*





### 3.3.2 Public Rights-of-Way Facilities

In 2017, the City of Dallas created a citywide inventory of curb ramps and sidewalks. The inventory for the northwest section of the City was updated in 2019 and the inventory for the remainder of the City was updated in Spring 2020. 62,297 curb ramps and 2,262 miles of sidewalk were identified. The following attributes were also collected:

- Curb Ramps
  - Presence of damage that creates a barrier to access
  - Locations where curb ramps are not installed but are needed
  - Presence of detectable warning surface
  
- Sidewalks
  - Obstructions
  - Obstruction type
  - Locations where sidewalk panels are missing
  - Presence of damage that creates a barrier to access
  - Sidewalk width

#### Public Rights-of-Way Facilities: Self-Evaluation Findings

A summary of curb ramp and sidewalk issues is provided in **Table 3** and **Table 4**, respectively.

**Table 3. Summary of Curb Ramp Issues**

Curb Ramp Issue	Number Evaluated	Number Non-Compliant	Percent Non-Compliant
Damage present that creates a barrier to access (e.g., vertical discontinuities, cracking, heaving, sinking)	62,297	1,247	2.0%
No curb ramp present where curb ramp is needed	62,297	15,247	24.5%
No detectable warning surface	62,297	40,357	64.8%

**Table 4. Summary of Sidewalk Issues**

Sidewalk Issue	Miles Evaluated	Miles Non-Compliant	Percent Non-Compliant
Obstructions present	2,261.4	745.2	33.0%
Missing sidewalk panels and/or damage present that creates a barrier to access (e.g., vertical discontinuities, cracking, heaving, sinking)	2,261.4	1,226	54.2%
Sidewalk width is less than 3 feet	2,261.4	175.1	7.7%



In addition to the curb ramp and sidewalk inventory and attribute data collection, the City has also spatially documented sidewalk complaints/requests received through the City's 3-1-1 system. The data collected by the City to-date is adequate to develop a prioritization methodology for curb ramps and sidewalks.

In September 2020, the City began the development of the City of Dallas Sidewalk Master Plan. The Sidewalk Master Plan will establish policies for sidewalks through the use of a data driven model and stakeholder input to prioritize future improvements. Determination of priority areas will be based on geographical data, which is anticipated to be proximity to places of public accommodation (e.g., schools, major public destinations, major health care facilities, bus stops, and commercial districts), the City of Dallas Equity Index (incorporates economic status, race, and age), pedestrian safety, street classification system, date of existing requests, and activity areas. The Plan will incorporate details to aid in the continue development of the Safe Routes to School program, ADA Transition Plan Implementation, and Five-Year Infrastructure Management Plan.

#### Public Rights-of-Way Facilities: Possible Solutions

Once the City of Dallas Sidewalk Master Plan development is complete updates will be made to the ADA Transition Plan to incorporate the Sidewalk Master Plan.

### 3.4 Maintenance Versus Alterations

The United States Department of Justice (DOJ) has issued a briefing memorandum on clarification of maintenance versus projects. Information contained in the briefing memorandum is below. We recommend this clarification with regard to when curb ramp installation is required as part of a project be distributed to the appropriate City of Dallas staff.

*The Americans with Disabilities Act of 1990 (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 United States Department of Justice (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.*

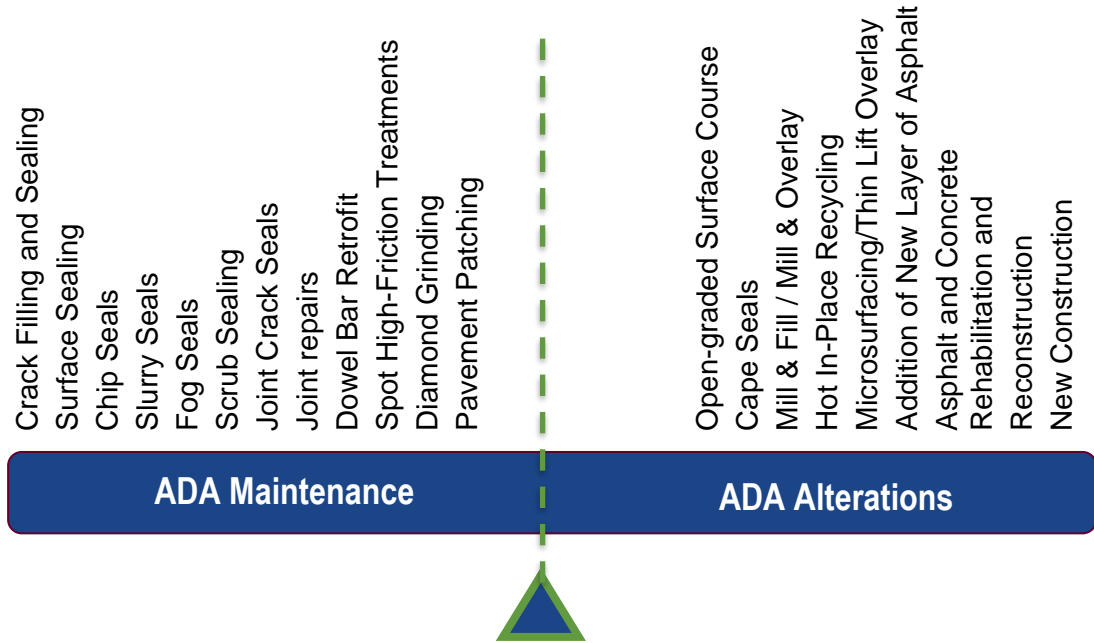
*FHWA and DOJ met in March 2012 and March 2013 to clarify guidance on the ADA's requirements for constructing curb ramps on resurfacing projects. Projects deemed to be alterations must include curb ramps within the scope of the project.*

*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



### 3.5 FHWA Guidance on 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 alternation 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.

The agency 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 Dallas should also develop and implement a policy on how to close those crossings that are accommodated based on the existing conditions at the crossing location (e.g., existing sidewalk leading up to the curb in the direction of the crossing or existing curb ramp or crosswalk serving the crossing), but should not be due to safety concerns.

### 3.6 Prioritization

Buildings were prioritized on a 12-point scale, which is defined in **Table 5** on the following page. This prioritization methodology was developed by the Consultant Team to aid the City in determining how the buildings should be prioritized for improvements based on the severity of non-compliance with ADA.

### 3.7 Action Log

As the evaluations are completed, the City will institute an ADA Action Log to confirm follow-up on corrective actions required under the Transition Plan and documenting City 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. See example of ADA Action Log provided in **Appendix H**.

*[The remainder of this page intentionally left blank.]*



**Table 5. Prioritization Factors for Buildings**

Priority	Criteria
<b>1 (high)</b>	Complaint known or imminent danger present
<b>2 (high)</b>	Issues with parking and exterior accessible routes (DOJ level 1) – severely out of compliance and is near a hospital, school, transit stop, govt. bldg., or other pedestrian attractor
<b>3 (high)</b>	Issues with parking and exterior accessible routes (DOJ level 1) – severely out of compliance and is not near a hospital, school, transit stop, govt. bldg., or other pedestrian attractor
<b>4 (high)</b>	Issues with parking or exterior conditions (DOJ level 1) – moderately out of compliance
<b>5 (medium)</b>	Issues with access to goods and services (DOJ level 2) – severely out of compliance
<b>6 (medium)</b>	Issues with: <ul style="list-style-type: none"> <li>• Parking and exterior routes (DOJ level 1) – minimally out of compliance;</li> <li>• Access to goods and services (DOJ level 2) – moderately out of compliance; OR</li> <li>• Restrooms (DOJ level 3) – severely out of compliance</li> </ul>
<b>7 (medium)</b>	Issues with: <ul style="list-style-type: none"> <li>• Access to goods and services (DOJ level 2) – minimally out of compliance;</li> <li>• Restrooms (DOJ level 3) – moderately out of compliance; OR</li> <li>• Drinking fountains or public phones (DOJ level 4 &amp; 5) – severely out of compliance</li> </ul>
<b>8 (medium)</b>	Issues with drinking fountains or public phones (DOJ level 4 & 5) - moderately out of compliance
<b>9 (low)</b>	Issues with restrooms (DOJ level 3) – minimally out of compliance
<b>10 (low)</b>	Issues with drinking fountains or public phones (DOJ level 4 & 5) - minimally out of compliance
<b>11 (low)</b>	<ul style="list-style-type: none"> <li>• De minimus barrier;</li> <li>• Client is a Title II agency; AND</li> <li>• Element is out of compliance, but may be handled with a programmatic change or employee request for accommodation</li> </ul>
<b>12 (low)</b>	Element is fully compliant with an previous standard (safe-harbor), but must comply with current standards if altered



## 4.0 Staff Training

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The following training sessions were provided by the Consultant Team:

- September 30, 2020 – Americans with Disabilities Act (ADA) Regulations and Disability Awareness Training Option #1 (2 hours)
- October 9, 2020 – Americans with Disabilities Act (ADA) Regulations and Disability Awareness Training Option #2 (2 hours)
- October 12, 2020 – ADA Liaison Training (2 hours)
- October 13, 2020 – Maintenance Training (2 hours)
- October 13, 2020 – Emergency Personnel Training (2 hours)

Descriptions of each training course are provided below:

### Americans with Disabilities Act (ADA) Regulations and Disability Awareness Training (2 hours)

The 2010 ADA Standards for Accessibility went into effect on March 15th, 2012. Receive information on implementing these guidelines, understand when the new rules apply, how they differ from existing codes and how they are more stringent than the State or Building Codes. Which must be complied with and how they can be incorporated into your master planning to create a framework to meet ADA compliance consistently. This class is essential for designers and engineers building facilities, infrastructure and parks in the city.

Overview of the access criteria and requirements mandated for state and local government staff interacting with the public. Best practices for sensitive and respectful interactions are explained. Communication topics include correct language and etiquette, appropriate use of terminology, and dealing with service animals in public places. The training concludes with a brief overview of maintaining accessibility for people with disabilities.

Attendees: Executive Management Team

### ADA Liaison Training (2 hours)

Accessology will train your staff to understand how to review and evaluate their department's existing policies and procedures for the Self-Evaluation process, required under Title II of the ADA. Findings and recommendations are based on staff evaluations and responses, and a work plan is developed for improving access for persons with disabilities. This is specific to policies and practices to ensure non-discrimination from department to department.

Attendees: Department ADA Liaisons



### Maintenance Training (2 hours)

The maintenance staff is on the front lines of access compliance and the key in maintaining accessible features, a requirement of the law. Problems can occur when furniture is moved, repairs are undertaken or landscaping improperly pruned, for example. Knowing that government staffs have limited resources, the training does not require augmenting staff or increasing budgets, rather making the staff aware of requirements and liabilities. Staff will learn to identify problem areas before they become hazards and know how to mitigate them.

Attendees: City Maintenance Divisions

### Emergency Personnel Training (2 hours)

This training is specific to the Fire Department and Police Department personnel on handling customers with disabilities. What can and can't be said and what can and can't be done in the process of interrogating, holding and processing people with disabilities.

Attendees: Emergency Management & First Responders

*[Remainder of page intentionally left blank]*





## 5.0 Facility Costs

### 5.1 Facilities Cost Projection Overview

To identify funding sources and develop a reasonable implementation schedule, cost projection summaries for only the facilities evaluated were developed. To develop these summaries, the Means ADA Compliance Pricing Guide, 2<sup>nd</sup> edition, 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 (50%) was added to the subtotal to account for other cost factors in addition to an engineering design percentage (15%). An additional contingency was also included for all elements within parking garages. All costs are in 2020 dollars. **Table 6** provides a summary of the estimated costs to bring each facility into compliance.

**Table 6. Summary of Facility Costs**

Facility Type	Priority*			Total
	High	Medium	Low	
Arcadia Park Library	\$18,975	\$9,490	\$11,305	\$39,770
Campbell Green Recreation Center	\$10,725	\$130,845	---	\$141,570
Dallas City Hall	\$145,615	\$859,405	\$341,635	\$1,346,655
Dallas Municipal Court	\$2,475	\$109,890	\$75,075	\$187,440
Eddie Bernice Johnson Union Station	\$9,075	\$750,420	\$31,765	\$791,260
Fretz Tennis Center	\$7,425	\$180,840	\$4,950	\$193,215
J. Erik Jonsson Central Library	\$13,200	\$348,400	\$303,270	\$664,870
KBH Convention Center	\$250,800	\$1,916,475	\$114,265	\$2,281,540
Kleberg Rylie Recreation Center	\$4,125	\$40,425	\$1,650	\$46,200
Majestic Theater	\$4,125	\$928,950	\$43,315	\$976,390
Martin Luther King Jr. Center Recreation Center	\$20,625	\$177,955	\$13,200	\$211,780
Martin Luther King Jr. Center Administration	\$33,000	\$100,735	\$19,885	\$153,620
Martin Luther King Jr. Child Care	\$29,125	\$350,625	\$2,065	\$381,815
Martin Luther King Jr. Clinic		\$147,595	\$44,550	\$192,145
Martin Luther King Jr. Library	\$10,315	\$85,060	\$15,265	\$110,640
Martin Luther King Jr. Parking Lot	\$2,065	\$13,200	---	\$15,265
Mildred Dunn Recreation Center	\$4,125	\$58,165	---	\$62,290
Moody Performance Hall (Exterior Only)	---	\$67,650	---	\$67,650
NE Patrol Station	\$20,215	\$73,840	\$52,390	\$146,445
Polk-Wisdom Library	---	\$8,665	\$6,600	\$15,265
South Dallas Cultural Center	\$22,275	\$150,070	\$11,550	\$183,895
SW Patrol Station	\$14,025	\$51,975	\$62,700	\$128,700
<b>City Totals</b>	<b>\$622,310</b>	<b>\$6,560,675</b>	<b>\$1,155,435</b>	<b>\$8,338,420</b>

\* Tables values are rounded for simplification.



It is important to note that the facility cost estimates in **Table 6** 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 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.

## 5.2 Implementation Schedule

The City of Dallas 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/504 Manager work together with department heads and budget staff to determine the funding sources for barrier removal projects. Once funding is identified, the ADA/504 Manager will coordinate the placement of the projects in the Capital Improvement Program (CIP) to be addressed on a fiscal year basis.

## 5.3 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.

### 5.3.1 Federal and State Funding

**Table 7** depicts the various types of federal and state funding available for the City to apply for funding for various improvements. The following agencies and funding options are represented in the chart.

- BUILD – Better Utilizing Investments to Leverage Development Transportation Discretionary Grants
- INFRA – Infrastructure for Rebuilding America Discretionary Grant Program
- TIFIA – Transportation Infrastructure Finance and Innovation Act (loans)
- FTA – Federal Transit Administration Capital Funds
- ATI – Associated Transit Improvement (1% set-aside of FTA)
- CMAQ – Congestion Mitigation and Air Quality Improvement Program
- HSIP – Highway Safety Improvement Program
- NHPP – National Highway Performance Program
- STBG – Surface Transportation Block Grant Program
- TA – Transportation Alternatives Set-Aside (formerly Transportation Alternatives Program)
- RTP – Recreational Trails Program
- SRTS – Safe Routes to School Program / Activities



- PLAN – Statewide Planning and Research (SPR) or Metropolitan Planning funds
- NHTSA 405 – National Priority Safety Programs (Nonmotorized safety)
- FLTTP – Federal Lands and Tribal Transportation Programs (Federal Lands Access Program, Federal Lands Transportation Program, Tribal Transportation Program, Nationally Significant Federal Lands and Tribal Projects)

Most of these programs are competitive type grants; therefore, the City of Dallas 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.

### 5.3.2 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 Reinvestment Zone
- Transportation User Fee / Street Maintenance Fee

### 5.3.3 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 by new development or redevelopment of an existing property.



**Table 7. Funding Opportunities**

Activity	BUILD	INFRA	TIFIA	FTA	ATI	CMAQ	HSIP	NHPP	STBG	TA	RTP	SRTS	PLAN	NHTS	FLTP
Access enhancements to public transportation	X	X	X	X	X	X		X	X	X					X
ADA/504 Self-Evaluation / Transition Plan									X	X	X		X		X
Bus shelters and benches	X	X	X	X	X	X		X	X	X					X
Coordinator positions (state or local)						X			X	X		X			
Crosswalks (new or retrofit)	X	X	X	X	X	X	X	X	X	X	X	X			X
Curb cut and ramps	X	X	X	X	X	X	X	X	X	X	X	X			X
Paved shoulders for pedestrian use	X	X	X			X	X	X	X	X		X			X
Pedestrian plans				X					X	X		X	X		X
Recreational trails	X	X	X						X	X	X				X
Shared use paths / transportation trails	X	X	X	X	X	X	X	X	X	X	X	X			X
Sidewalk (new or retrofit)	X	X	X	X	X	X	X	X	X	X	X	X			X
Signs / signals / signal improvements	X	X	X	X	X	X	X	X	X	X		X			X
Signed pedestrian routes	X	X	X	X	X	X		X	X	X		X			X
Spot improvement programs	X	X	X	X			X	X	X	X	X	X			X
Stormwater impacts related to pedestrian projects	X	X	X	X	X		X	X	X	X	X	X			X
Trail bridges	X	X	X			X	X	X	X	X	X	X			X
Trail / highway intersections	X	X	X			X	X	X	X	X	X	X			X
Trailside and trailhead facilities	X	X	X						X	X	X				X
Training						X	X		X	X	X	X	X	X	
Tunnels / undercrossings for pedestrians	X	X	X	X	X	X	X	X	X	X	X	X			X

Adapted from FHWA Pedestrian and Bicycle Funding Opportunities, Revised August 9, 2018:  
[https://www.fhwa.dot.gov/environment/bicycle\\_pedestrian/funding/funding\\_opportunities.cfm](https://www.fhwa.dot.gov/environment/bicycle_pedestrian/funding/funding_opportunities.cfm)



## 6.0 Next Steps

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This document serves as the Americans with Disabilities Act (ADA) Transition Plan for the City of Dallas. The City intends to budget for and complete the Self-Evaluation of programs, services, activities, and facilities identified in this document.

The next steps for the City of Dallas are:

1. Develop an Action Plan for completing a Self-Evaluation for all City programs, services, activities, and facilities.
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. 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.



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## Appendix

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Appendix A: City of Dallas ADA Compliance Plan

Appendix B: City of Dallas Registered Historic Places

Appendix C: ADA Focus Group Meeting Notes

Appendix D: City of Dallas Roles and Responsibilities of the ADA/504 Manager

Appendix E: Website Review

Appendix F: Programs, Services, and Activities Inventory

Appendix G: Facility Reports

Appendix H: ADA Action Log