THE CITY OF BURLESON TEXAS



City of Burleson

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

October 2026

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The City of Burleson has prepared this transition plan with the assistance of the consultant team led by Kimley-Horn and Associates, Inc. The consultant team, the ADA/504 Coordinator, and the contributing City departments are responsible for developing the ADA Self-Evaluation and Transition Plan.



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ABBREVIATIONS GLOSSARY

ADA – Americans with Disabilities Act

A comprehensive civil rights law that prohibits discrimination based on disability in employment, public services, public accommodations, and telecommunications. Enacted in 1990, the ADA ensures equal opportunities and protections for individuals with disabilities. In 2008, the ADA Amendments Act was passed. Its purpose is to broaden the definition of disability, which U.S. Supreme Court decisions had narrowed.

ADAAG – Americans with Disabilities Act Accessibility Guidelines

Document that contains scoping and technical requirements for accessibility to buildings and facilities by individuals with disabilities under the ADA of 1990. These scoping and technical requirements are to be applied during the design, construction, and alteration of buildings and facilities covered by titles II and III of the ADA to the extent required by regulations issued by Federal agencies, including the Department of Justice and the Department of Transportation, under the ADA.

CFR – Code of Federal Regulations

The official legal print publication containing the codification of the general and permanent rules published in the Federal Register by the departments and agencies of the Federal Government.

CIP – Capital Improvement Program

A comprehensive plan that outlines a local government's major infrastructure projects and purchases over a specific period, typically 5-10 years. It's a crucial tool for managing and financing large-scale projects, ensuring infrastructure needs are addressed strategically and efficiently.

DOJ – United States Department of Justice

Under the leadership of the Attorney General of the United States, the Justice Department comprises more than 40 component organizations and more than 115,000 employees. Headquartered at the Robert F. Kennedy Building in Washington, D.C., the Department maintains field offices in all 50 states and territories of the United States and in more than 50 countries worldwide. The mission of the DOJ is to uphold the rule of law, to keep the country safe, and to protect civil rights.

FHWA – Federal Highway Administration

An agency within the U.S. Department of Transportation that supports State and local governments in the design, construction, and maintenance of the Nation’s highway system (Federal Aid Highway Program) and various federally and tribal owned lands (Federal Lands Highway Program). Through financial and technical assistance to State and local governments, the Federal Highway Administration is responsible for ensuring that America’s roads and highways remain among the safest and most technologically advanced in the world.

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MUTCD – Manual on Uniform Traffic Control Devices

By setting minimum standards and providing guidance, the MUTCD ensures uniformity in traffic control devices (TCD) nationwide. The information contained in the MUTCD is the result of years of practical experience, research, and/or the MUTCD experimentation process. This effort ensures that TCDs are visible, recognizable, understandable, and necessary. The MUTCD is a dynamic document that changes with time to address contemporary safety and operational issues.

OPDMD – Other Power-Driven Mobility Devices

Any mobility device powered by batteries, fuel, or other engines—whether or not designed primarily for use by individuals with mobility disabilities—that is used by individuals with mobility disabilities for locomotion, including golf carts, electronic personal assistance mobility devices, such as the Segway® PT, or any mobility device designed to operate in areas without defined pedestrian routes, but that is not a wheelchair.

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

Guidelines published by the U.S. Access Board under the ADA and the ABA that address access to sidewalks and streets, crosswalks, curb ramps, pedestrian signals, on-street parking, and other components of public right-of-way. These guidelines also address shared-use paths, which are designed primarily for bicyclists and pedestrians for transportation and recreation.

PSA – Programs, Services, and Activities

Refers to the various initiatives, assistance, and engagement opportunities offered by organizations, governments, and communities to support individuals and groups. These can range from social services and educational opportunities to recreational activities and community development projects. They aim to address needs, promote well-being, and foster participation in various aspects of life.

TAC – Texas Administrative Code

Compilation of all state agency rules in Texas. There are 17 titles in the TAC. Each title represents a subject category, and related agencies are assigned to the appropriate title.

TAS – Texas Accessibility Standards

Scoping and technical requirements for accessibility to sites, facilities, buildings, and elements by individuals with disabilities. The requirements are to be applied during the design, construction, additions to, and alteration of sites, facilities, buildings, and elements to the extent required by regulations issued by the Texas Department of Licensing and Regulation under the authority of Texas Government Code, Chapter 469. These standards are intended to be consistent with those contained in the 2010 Standards of Accessible Design.

TCAP – TxDOT Comprehensive Accessibility Program

TxDOT's program for identifying, prioritizing, and implementing accessibility improvements within state-owned transportation facilities and public rights-of-way.

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TDLR – Texas Department of Licensing and Regulation

Provides oversight for a broad range of occupations, businesses, facilities, and equipment. TDLR protects the health and safety of Texans and ensures qualified professionals serve them. TDLR fosters a predictable regulatory climate by minimizing government interference.

TMUTCD – Texas Manual on Uniform Traffic Control Devices

States are required to adopt the National MUTCD or have a State MUTCD/supplement that is in substantial conformance with the National Manual. Texas has chosen to have a State MUTCD instead of adopting the National MUTCD.

TxDOT – Texas Department of Transportation

TxDOT is a state government agency responsible for planning, designing, constructing, operating, and maintaining Texas' statewide transportation system. Its responsibilities primarily include the state highway system, while also supporting other transportation modes such as aviation, rail, and public transportation.

UFAS – Uniform Federal Accessibility Standards

This document presents uniform standards for the design, construction, and alteration of buildings so that individuals with physical disabilities will have ready access to and use of them in accordance with the ABA. The document embodies an agreement to minimize the differences between the standards previously used by four agencies (the General Services Administration, the departments of Housing and Urban Development and Defense, and the United States Postal Service) that are authorized to issue standards under the ABA, and between those standards and the access standards recommended for facilities that are not federally funded or constructed.

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1.0 INTRODUCTION

1.1 PURPOSE

The purpose of this Americans with Disabilities Act (ADA) Self-Evaluation and Transition Plan is to summarize the activities completed to date related to ADA compliance and to create a roadmap for the City of Burleson to update its ADA Transition Plan over time. A prioritization methodology for evaluating and implementing improvements was developed based on the applicable ADA Standards and the Public Rights-of-Way Accessibility Guidelines (PROWAG), and the details are provided in this document.

This document provides an overview of the ADA. It offers possible solutions for the City of Burleson, based on guidance from the Federal Highway Administration (FHWA) and the U.S. Department of Justice (DOJ), to improve public accessibility.

1.2 LEGISLATIVE MANDATE

The ADA is a civil rights law that mandates equal opportunity for individuals with disabilities and prohibits discrimination in access to jobs, public accommodations, government services, public transportation, and telecommunications. The ADA is divided into five titles:

- Title I: Employment
- Title II: Public Services
- Title III: Public Accommodations
- Title IV: Telecommunications
- Title V: Miscellaneous Provisions

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 Burleson has undertaken a comprehensive evaluation of its PSAs to determine the extent to which individuals with disabilities may be restricted in their access.

1.3 ADA SELF-EVALUATION AND TRANSITION PLAN DEVELOPMENT REQUIREMENTS AND PROCESS

The City of Burleson 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 applicable ADA Standards and PROWAG that apply to facilities and other physical holdings.

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

- Completion of a Self-Evaluation.
- Providing notice to the public about the ADA.
- Adoption and publishing of a Title II grievance procedure.

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- Designation of an employee 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 Burleson's PSAs and facilities, provides possible solutions to remove programmatic barriers, and presents a Transition Plan for the modification of facilities and public rights-of-way to improve accessibility, which will guide the planning and implementation of necessary program and facility modifications over the next 25 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 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 for individuals with sensory and cognitive disabilities.

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

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

1.4.1 PHYSICAL BARRIERS

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

1.4.2 PROGRAMMATIC BARRIERS

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

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1.4.3 ONGOING ACCESSIBILITY IMPROVEMENTS

City services, policies, practices, programs, activities, 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 modifications which have been or will be completed since the initial Self-Evaluation. This Plan will be posted on the City's website for public review and consideration.

1.4.4 CITY OF BURLESON APPROACH

The purpose of the Transition Plan is to provide the framework for achieving equal access to the City of Burleson's PSAs within a reasonable timeframe. The City's elected officials and staff believe that accommodating persons with disabilities is essential to good customer service, to ensuring residents' quality of life, and to guiding future improvements. This Plan has been prepared after careful study of all City programs, services, activities, and evaluations of all City facilities.

The City of Burleson should make reasonable modifications in PSAs when necessary to avoid discrimination based on disability, unless the City can demonstrate making the modifications will fundamentally alter the nature of the program, service, or activity. The City of Burleson will not impose surcharges on individuals with disabilities to cover the costs of making PSAs accessible.

1.4.5 EXCEPTIONS AND EXEMPTIONS

Per the ADA Title II Regulations, a public entity shall operate each program, service, or activity so that the program, service, or activity, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities. However, a public entity is not required to:

- Make each of its existing facilities accessible to and usable by individuals with disabilities.
- Take any action that would threaten or destroy the historic significance of a historic property.
- Take any action that it can demonstrate would result in a fundamental alteration in the nature of a service, program, or activity or in undue financial and administrative burdens.
- Permit an individual to participate in or benefit from the services, programs, or activities of that public entity when that individual poses a direct threat to the health or safety of others.

The sections below describe these exceptions and exemptions. If the City determines that a proposed action would generate an undue financial or administrative burden, create hazardous conditions for others, or threaten or destroy the historic significance of a historic property, the City has a responsibility to communicate and document the decision and the methodology used. 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 individuals with disabilities receive the benefits or services provided by the City.

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EXISTING FACILITIES

A public entity is not required to make structural changes in existing facilities where other methods are effective in making its services, programs, or activities readily accessible to and usable by individuals with disabilities. In choosing among available methods for meeting the compliance requirements, a public entity shall give priority to those methods that offer services, programs, and activities to qualified individuals with disabilities in the most integrated setting appropriate.

HISTORIC SIGNIFICANCE

In determining whether an alteration would threaten or destroy the historic significance of a historic property, the City of Burleson should first confirm if the property is a qualified historic building or facility, which the ADA defines as a "building or facility that is listed in or eligible for listing in the National Register of Historic Places, or designated as historic under an appropriate state or local law." Based on a search of the National Register of Historic Places NPGallery Database and the associated geodatabase, the City of Burleson has no registered historical places within the City of Burleson, but there may be other documentation available not provided on these websites

- View the National Register of Historic Places website.
- View the National Register of Historic Places database.

FUNDAMENTAL ALTERATIONS AND UNDUE BURDENS

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 people 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 separation, administrative, or fiscal relationship of the facility or facilities in question to the covered entity.

DIRECT THREAT

In determining whether an individual poses a direct threat to the health or safety of others, a public entity must make an individualized assessment, based on reasonable judgment that relies on current medical knowledge or on the best available objective evidence, to ascertain: the nature, duration, and severity of the risk; the probability that the potential injury will actually occur; and whether reasonable modifications of policies, practices, or procedures or the provision of auxiliary aids or services will mitigate the risk.

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1.5 NEW CONSTRUCTION AND ALTERATIONS

Per the ADA Title II Regulations, if the construction start date 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 ADA Standards (without the elevator exemption), the Uniform Federal Accessibility Standards (UFAS), or the 2010 ADA Standards may be used for such projects when construction commences on or after September 15, 2010 (see **Table 1**).

TABLE 1. SUMMARY OF APPLICABLE STANDARDS

Compliance Date for New Construction or Alterations	Applicable Standards
Before September 15, 2010	1991 ADA Standards or UFAS
On or after September 15, 2010, and before March 15, 2012	1991 ADA Standards, UFAS, or 2010 ADA Standards
On or after March 15, 2012	2010 ADA Standards

The U.S. Access Board is an independent federal agency that advances accessibility through leadership in accessible design and the development of accessibility guidelines and standards. On July 26, 1991, the U.S. Access Board published the original Americans with Disabilities Act Accessibility Guidelines (ADAAG), which were also adopted as DOJ standards that day. Between 1994 and 2002, the U.S. Access Board worked to update the 1991 ADAAG to include supplements covering state and local government facilities, building elements designed for children's use, play areas, and recreation facilities. The U.S. Access Board issued the updated ADA and ABA Accessibility Guidelines as a final rule on July 23, 2004 (2004 ADAAG).

The most recent standard is the 2010 ADA Standards, which sets the minimum requirements – both scoping and technical – for newly designed and constructed or altered state and local government facilities, public accommodations, and commercial facilities to be readily accessible to and usable by individuals with disabilities. It is effectuated from 28 Code of Federal Regulations (CFR) 35.151 and the 2004 ADAAG. However, the FHWA and DOJ recommend using PROWAG for designing facilities within the public rights-of-way as a best practice until it is adopted at the federal level. Additionally, the Texas Department of Transportation (TxDOT) has adopted PROWAG and incorporated the guidelines into design standards for pedestrian facilities.

2010 ADA Standards

The DOJ's revised regulations for Titles II and III of the Americans with Disabilities Act of 1990 (ADA) were published in the Federal Register on September 15, 2010. These adopted, revised regulations are 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,

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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. The Accessibility Guidelines for Pedestrian Facilities in the Public Rights-of-Way (PROWAG) provide 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. PROWAG is the recommended best practice and can be considered the state of the practice that could be followed for areas not fully addressed by the 2010 ADA Standards.

In the state of Texas, the Texas Administrative Code (TAC) Chapter 68 (Elimination of Architectural Barriers), Rule §68.102 (Public Right-of-Way 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.*

The U.S. Department of Transportation (DOT) published its Final Rule on Transportation for Individuals with Disabilities: Adoption of Accessibility Standards for Pedestrian Facilities in the Public Right-of-Way (PROWAG) as the DOT's regulatory standards for new construction and alterations of transit stops in the public right-of-way. The Final Rule became effective on January 17, 2025. The DOT will also be determining how to ensure that there is no "conflict" between PROWAG and the 11th Edition of the Manual on Uniform Traffic Control Devices for Streets and Highways (MUTCD).

Until DOJ adopts 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 usable by" individuals with disabilities). Public entities are not required to adopt the Final PROWAG at this time. Still, they may turn to other resources for guidance (e.g., the Final PROWAG, DOJ's 2010 ADA Standards for buildings and sites, and other accessibility resources). However, it is recommended that the City of Burleson adopt PROWAG so that it becomes an enforceable document for all City projects within the public rights-of-way, regardless of PROWAG's adoption status at the state and federal levels.

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 FHWA publishes the MUTCD under 23 CFR, Part 655, Subpart F, and it 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

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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, effective January 18, 2024.

The current version of the Texas Manual on Uniform Traffic Control Devices (TMUTCD) is the 2025 TMUTCD, which became effective on January 18, 2026. All projects letting between January 18, 2026 and June 30, 2026, at the discretion of the jurisdiction, may conform to the 2011 TMUTCD – Revision 2 to minimize scope, schedule, or budget impacts. All projects letting after July 1, 2026 shall comply with the 2025 TMUTCD.

1.6 EXISTING CITY PROGRAMS THAT IMPLEMENT ADA UPGRADES

The City of Burleson continually incorporates accessibility improvements through capital projects, facility upgrades, maintenance activities, and development review processes. These efforts help remove barriers to access and support compliance with the Americans with Disabilities Act (ADA).

Ongoing Accessibility Programs

- **Capital Improvement Program (CIP)**
  The City's Capital Improvement Program includes both new construction and the rehabilitation of existing infrastructure. Roadway reconstruction projects incorporate ADA-compliant curb ramps and may also include sidewalk reconstruction and the completion of missing sidewalk connections. Improvements to parks and public facilities include accessibility enhancements designed to meet applicable ADA standards.

- **New Development and Redevelopment**
  Accessibility requirements are incorporated into the review and approval of new development and redevelopment projects. As public infrastructure is constructed or modified, ADA-compliant design standards are implemented in accordance with applicable regulations.

- **Maintenance and Operations Improvements**
  The City addresses accessibility barriers through ongoing maintenance and operations activities. When facilities and infrastructure are repaired, replaced, or upgraded, accessibility enhancements are incorporated where feasible and appropriate.

- **Recent Accessibility Improvements**
  Since submission of the Draft Transition Plan in August, the City has initiated and completed several improvements to address accessibility barriers at public facilities, including:
  - Raising sunken sidewalk panels at several City facilities, including the Police Department, Fire Station No. 3, Library, and Municipal Court.
  - Addressing protruding objects along pedestrian circulation routes at the Burleson Senior Center through replacement of non-compliant elements or installation of detectable features below 27 inches above the finished floor.

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Planned Accessibility Improvements

The City has identified additional accessibility improvements that are planned for implementation, including:

- Correcting restroom accessibility barriers at facilities such as the Library and Municipal Court, including issues related to doors, signage, and reach ranges.
- Implementing facility accessibility improvements funded through a Fiscal Year 2027 allocation of $50,000 dedicated to removing barriers within City-owned buildings.

Planned improvements may include:

- Signage upgrades and adjustments
- Reach range modifications
- Removal or mitigation of protruding objects
- Improvements to knee and toe clearances at seating areas and other amenities
- Surface improvements to provide firm, stable, and slip-resistant accessible routes

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2.0 PUBLIC OUTREACH

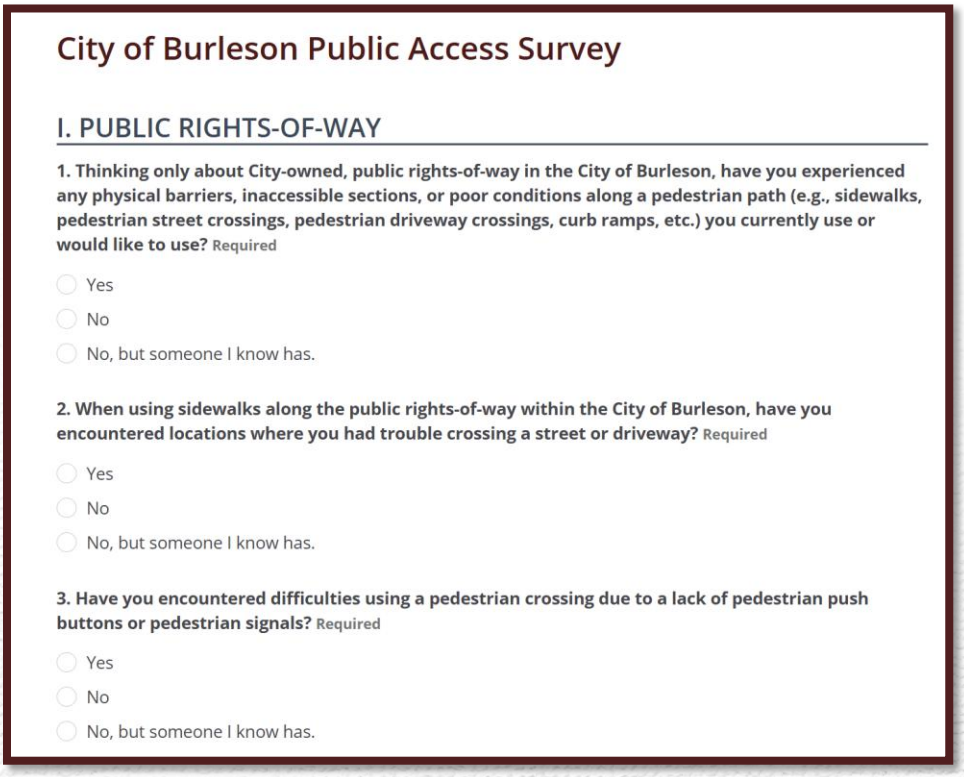
Gathering feedback from the public and the disability community was a vital step in developing the City of Burleson ADA Self-Evaluation and Transition Plan. Several outreach efforts were conducted to engage residents, stakeholders, and individuals with disabilities, ensuring that the City's accessibility improvement efforts reflect community needs and priorities.

To support these efforts, the City contacted local disability organizations to form an ADA Advisory Committee. The City hosted two ADA Advisory Committee meetings, one on January 15, 2026, and one on May 27, 2026. These meetings focused on providing project updates, reviewing the status of facility evaluations, and soliciting input from committee members regarding accessibility needs and priorities within the community. The ADA Advisory Committee serves as an important component of the City's ongoing commitment to ensuring that individuals with disabilities engage with and participate in the planning process of the City of Burleson. A final ADA Advisory Committee meeting is scheduled for September 2026.

2.1 WEB SURVEY

The City developed a web survey open to the public. The survey was designed to help the City collect invaluable input from community members, including those with disabilities, regarding existing barriers to access. The survey was publicized, made available online, and feedback was documented between June 15, 2026 and July 17, 2026.

FIGURE 1. CITY OF BURLESON PUBLIC WEB SURVEY



City of Burleson Public Access Survey

I. PUBLIC RIGHTS-OF-WAY

1. Thinking only about City-owned, public rights-of-way in the City of Burleson, have you experienced any physical barriers, inaccessible sections, or poor conditions along a pedestrian path (e.g., sidewalks, pedestrian street crossings, pedestrian driveway crossings, curb ramps, etc.) you currently use or would like to use? Required

- Yes
- No
- No, but someone I know has.

2. When using sidewalks along the public rights-of-way within the City of Burleson, have you encountered locations where you had trouble crossing a street or driveway? Required

- Yes
- No
- No, but someone I know has.

3. Have you encountered difficulties using a pedestrian crossing due to a lack of pedestrian push buttons or pedestrian signals? Required

- Yes
- No
- No, but someone I know has.

The survey garnered a total of 59 responses:

- 75% responded positively when asked about barriers in Public-Rights-of-Way
- 85% responded positively when asked about programmatic barriers
- 83% of respondents believe the City is accommodating of persons with disabilities

2.2 WEB MAP



FIGURE 2. CITY OF BURLESON PUBLIC INTERACTIVE WEB MAP

The City also developed an online map to allow the public to identify specific locations where they experience issues related to accessibility, safety, connectivity, or suggestions for accessibility improvements that are needed in Burleson. The map was publicized, made available online, and feedback was documented between June 15, 2026 and July 17, 2026:

The online map garnered a total of 96 responses.

- 39 respondents communicated issues with sidewalks in poor condition, missing sidewalks, steep slopes, or an obstruction present
- 34 respondents communicated an issue with curb ramps, crossing conditions, tripping hazards, or missing walk signals
- 23 respondents communicated an issue with difficulty accessing public areas, public buildings, or other issues

The web survey and map were posted on the City's webpage and shared across social media platforms. The City will continue to solicit feedback from the public as implementation of the Transition Plan moves forward.

A full summary of the responses to the survey is provided in **Appendix A.**

3.0 STAFF TRAINING

Developing staff knowledge of accessibility requirements helps ensure that accessibility considerations are incorporated into the operation and maintenance of City facilities, programs, and services. Specialized training was provided for City staff on topics related to accessibility and relevant to the development of the City's ADA Transition Plan. The Consultant Team provided the following training sessions:

- June 18, 2026 – 2010 Americans with Disabilities Act (ADA) Accessibility Standards Training (2 hours in office, 2 hours in field)
- June 25, 2026 – 2023 Public Right-of-Way Accessibility Guidelines Final Rule Training (2 hours in office, 2 hours in field)

DESCRIPTIONS OF EACH TRAINING COURSE ARE PROVIDED BELOW:

2010 Americans with Disabilities Act (ADA) Accessibility Standards Training

(2 hours in office, 2 hours in field)

The 2010 ADA Standards establish minimum scoping and technical requirements to ensure newly designed, constructed, or altered State and local government facilities, public accommodations, and commercial facilities are accessible and usable by individuals with disabilities. This training series provides participants with a practical understanding of the 2010 ADA Standards as they apply to interior building elements. Attendees will learn key requirements, common compliance challenges, and best practices for designing and evaluating accessible interior environments.

City Staff in Attendance: 23

2023 Public Right-of-Way Accessibility Guidelines Final Rule Training

(2 hours in office, 2 hours in field)

This course offers a comprehensive, practical exploration of the Public Rights-of-Way Accessibility Guidelines (PROWAG) and their real-world application in the design and construction of pedestrian facilities. Attendees will learn how to correctly interpret scoping and technical criteria, identify and avoid common design errors, and navigate challenges such as technical infeasibility while ensuring adherence to PROWAG to the maximum extent feasible.

City Staff in Attendance: 25

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4.0 SELF-EVALUATION AND SUMMARY OF OBSERVATIONS

The City of Burleson's ADA Self-Evaluation reflects the results of a review of select programs, services, and activities, as well as the policies and practices the City uses to implement its various programs, services, and activities.

4.1 SERVICES, POLICIES, AND PRACTICES REVIEW

Under the ADA, the City of Burleson is required to complete a Self-Evaluation of the City's services, policies, and practices and operate each service, program, and activity so that it is readily accessible and useable by individuals with disabilities. The Self-Evaluation identifies and provides possible solutions to those services, 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, services, and activities.

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

- Relocation of programs to accessible facilities.
- Modifications to existing programs so they are offered in an accessible manner.
- Structural methods such as altering an existing facility.
- Policy modifications to ensure nondiscrimination; and
- 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 should generally be made by the ADA/504 Coordinator and/or an authorized designee of the City, such as the City Manager or their designee, and must be accompanied by a written statement detailing the reasons for reaching the determination.

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

General observations and possible solutions regarding the City's policies, practices, programs, services, and activities are included in **Sections 4.1.6** – **4.1.18**. Example documents and/or resources are provided where applicable for City reference. These links are being provided as a convenience and for informational purposes only. Kimley-Horn bears no responsibility for the accuracy, legality, or content of the external site or for that of subsequent links.

4.1.1 ADA/504 COORDINATOR

Per the ADA Title II Regulations, §35.107(a) Designation of responsible employee, a public entity that employs 50 or more persons shall designate at least one employee to coordinate its efforts to comply with and carry out its responsibilities under Title II, including any investigation of any complaint communicated to it alleging its noncompliance with this part or alleging any actions that Title II would prohibit. The public entity shall make available to all interested individuals the name, office address, and telephone number of the employee or employees designated. This allows for clear identification of the City employees able to assist with questions and concerns regarding disability discrimination.

The City of Burleson has appointed Cheryl Marthiljohni as ADA/504 Coordinator for Title II. Below is the ADA/504 Coordinator's contact information.

Cheryl Marthiljohni, ADA/504 Coordinator
Director of Human Resources
141 W Renfro Street
Burleson, TX 76028-4296
Office: 817-426-9640
Relay: 7-1-1
ADA@burlesontx.com

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

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

4.1.2 ROLES AND RESPONSIBILITIES OF THE ADA/504 COORDINATOR

Below is a list of qualifications for ADA Coordinators that the DOJ recommends:

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

The responsibilities of the ADA/504 Coordinator include coordinating the City's efforts to comply with Title II and investigating complaints related to potential Title II violations. The role of the ADA/504 Coordinator typically includes serving as the primary contact when members of the public request an auxiliary aid or service for effective communication, such as a sign language

interpreter or Braille documents. An effective ADA/504 Coordinator will be able to efficiently answer questions regarding accessibility from both staff and the public. These roles and responsibilities are consistent with the guidance in the DOJ's ADA Title II toolkit. View the **DOJ Title II Toolkit**.

4.1.3 ADA LIAISON COMMITTEE

The City of Burleson has established an ADA Liaison Committee that is comprised of representatives from various City departments. These representatives are tasked with serving as the ADA contact for their department and will consult with the ADA/504 Coordinator 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 Coordinator and shall be retained for at least three (3) years.

To promote awareness of the committee and its activities, ADA Liaison Committee information can be publicized in common areas accessible to employees and areas open to the public. This includes posting this information on the City website.

4.1.4 ADA TITLE II GRIEVANCE POLICY, PROCEDURE, AND FORM WITH APPEALS PROCESS

Per the ADA Title II Regulations, §35.107(b) complaint procedure, a public entity that employs 50 or more persons shall adopt and publish grievance procedures providing for prompt and equitable resolution of complaints alleging any action that Title II would prohibit. The DOJ's Title II Toolkit suggests the grievance procedure include:

- A description of how and where a complaint under Title II may be filed.
- 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 City's Title II ADA Grievance Policy, Procedure, and Form is posted on the **City website**. View the City of Burleson ADA Grievance Procedure and Form:

- **City of Burleson ADA Grievance Procedure (English)**
- **City of Burleson ADA Grievance Procedure (Spanish)**
- **City of Burleson ADA Grievance Form (English)**
- **City of Burleson ADA Grievance Form (Spanish)**

4.1.5 PUBLIC NOTICE UNDER THE ADA

Per the ADA Title II Regulations, §35.106 Notice, a public entity shall make available to applicants, participants, beneficiaries, and other interested persons information regarding the provisions of this part and its applicability to the services, programs, or activities of the public entity, and make such information available to them in such manner as the head of the entity

finds necessary to apprise such persons of the protections against discrimination assured them by the ADA.

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 DOJ Title II Toolkit suggests the ADA notice includes 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. State and local government entities should provide the information on an ongoing basis, whenever necessary.

The City's Public Notice Under the ADA is posted on the **City website**. View the **City of Burleson's Public Notice Under the ADA**.

4.1.6 ADA/504 ASSURANCE

Public entities subject to Title II of the ADA may also be subject to Section 504 of the Rehabilitation Act of 1973 and other federal statutes that prohibit discrimination on the basis of disability in the programs and activities of recipients of federal financial assistance. A public entity must have documents that guarantee that, as a recipient of federal financial assistance, the public entity will not discriminate on the basis of a disability.

ADA/504 ASSURANCE: OBSERVATIONS

The City does not have a non-discrimination assurance.

ADA/504 ASSURANCE: POSSIBLE SOLUTIONS

The City should create a signed ADA/504 Assurance. The Texas Department of Transportation (TxDOT) has posted its **ADA/504 Assurance** on its website, which the City can use as a starting point.

4.1.7 NON-DISCRIMINATION LANGUAGE FOR NON-FEDERAL CONTRACTS

In addition to the notice requirements described in **Section 4.1.5 Public Notice Under the ADA**, the City is also required to follow the ADA Title II §35.130 General prohibitions against discrimination related to contractual agreements with third parties and have an obligation to ensure that their contractors do not discriminate against people with disabilities. Applicable excerpts from §35.130 consist of:

> (b)(1) A public entity, in providing any aid, benefit, or service, may not, directly or through contractual, licensing, or other arrangements, on the basis of disability—

(v) Aid or perpetuate discrimination against a qualified individual with a disability by providing significant assistance to an agency, organization, or person that discriminates on the basis of disability in providing any aid, benefit, or service to beneficiaries of the public entity's program;

(b)(3) A public entity may not, directly or through contractual or other arrangements, utilize criteria or methods of administration—

(i) That have the effect of subjecting qualified individuals with disabilities to discrimination on the basis of disability;

(ii) That have the purpose or effect of defeating or substantially impairing accomplishment of the objectives of the public entity's program with respect to individuals with disabilities; or

(iii) That perpetuate the discrimination of another public entity if both public entities are subject to common administrative control or are agencies of the same State.

(b)(5) A public entity, in the selection of procurement contractors, may not use criteria that subject qualified individuals with disabilities to discrimination on the basis of disability.

NON-DISCRIMINATION LANGUAGE FOR NON-FEDERAL CONTRACTS: OBSERVATIONS

The City does not have non-discrimination language for contracts, agreements, and waivers such as website hosting, maintenance agreements, lease agreements, or other services provided by third parties. Non-Discrimination Policy Language for Non-Federal Contracts: Possible Solutions

The City should consider developing and implementing a policy related to contractual agreements with third parties consistent with the Title II Regulations. The City should consider developing and including language prohibiting discrimination in all third-party contracts, agreements, and waivers.

Additional information regarding leased facilities can be found on the following webpages:

- **What Every Tenant and Landlord Needs to Know About ADA Access Violations | ADA National Network**
- **Responsibility for ADA compliance in leased places of public accommodation | ADA National Network**
- **Is the lessee obligated to address compliance issues or is it solely the responsibility of the building owner? | ADA National Network**

4.1.8 RETALIATION AND COERCION POLICIES

The ADA protects individuals from retaliation for, and coercion in, exercising their rights under the ADA. Per the Title II Regulations, §35.134 Retaliation or coercion:

(a) No private or public entity shall discriminate against any individual because that individual has opposed any act or practice made unlawful by Title II, or because that individual made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under the ADA.

(b) No private or public entity shall coerce, intimidate, threaten, or interfere with any individual in the exercise or enjoyment of, or on account of his or her having exercised or enjoyed, or on account of his or her having aided or encouraged any other individual in the exercise or enjoyment of, any right granted or protected by the ADA.

RETALIATION AND COERCION POLICIES: OBSERVATIONS

The City does not have a retaliation policy or a coercion policy.

RETALIATION AND COERCION POLICIES: POSSIBLE SOLUTIONS

While it is not a specific requirement to have a retaliation policy or a coercion policy, having these will help the City meet the requirements for this section of the Title II Regulations. The City should consider developing and implementing a retaliation policy and a coercion policy consistent with the Title II Regulations.

4.1.9 REASONABLE MODIFICATION REQUEST POLICY, PROCEDURE, AND REQUEST FORM

Per the Title II Regulations, §35.130(b)(7)(i) General prohibitions against discrimination, a public entity shall make reasonable modifications in policies, practices, or procedures when the modifications are necessary to avoid discrimination on the basis of disability, unless the public entity can demonstrate that making the modifications would fundamentally alter the nature of the service, program, or activity.

Reasonable modifications to rules, policies, or practices, the removal of architectural, communication, or transportation barriers, or the provision of auxiliary aids and services may need to be provided, upon request, to a qualified individual with a disability that meets the essential eligibility requirements for the receipt of services or the participation in programs or activities provided by a public entity.

REASONABLE MODIFICATION REQUEST POLICY, PROCEDURE, AND REQUEST FORM: OBSERVATIONS

The City has an "ADA Accommodation Request" policy posted on the website; however, it is inconsistent with the City's **ADA Notice**. The ADA Notice indicates requests for reasonable modifications should be made 48 hours before the scheduled event, but the "ADA Accommodations Request" indicates 3 days in advance.

Information on how to request a reasonable modification or effective communication aids and services is not provided on webpages for specific City programs, services, and activities.

REASONABLE MODIFICATION REQUEST POLICY, PROCEDURE, AND REQUEST FORM: POSSIBLE SOLUTIONS

While it is not a specific requirement to have a Title II reasonable modification request policy, procedure, and request form, having these will help the City meet the requirements for this section of the Title II Regulations. The City should consider removing the "ADA Accommodation Request" from the website to avoid inconsistencies with the ADA Notice. If the City would like

this information duplicated on the website, consider copying the text directly from the ADA Notice.

The City should consider providing information on how to request a reasonable modification or effective communication aid or service on webpages for specific City programs, services, and activities. The City should also consider reviewing internal documentation, policies, practices, and procedures related to the program, service, or activity to confirm all requirements in §35.130 have been met.

Additional information is provided in the **ADA Title II Regulations §35.130 General prohibitions against discrimination | ADA.gov**.

4.1.10 EFFECTIVE COMMUNICATION POLICY, PROCEDURE, AND REQUEST FORM

The City is obligated to provide auxiliary aids and services for people who are deaf or hard of hearing. Per the Title II Regulations, §35.160(a)(1) General, a public entity shall take appropriate steps to ensure that communications with applicants, participants, members of the public, and companions with disabilities are as effective as communications with others.

EFFECTIVE COMMUNICATION POLICY, PROCEDURE, AND REQUEST FORM: OBSERVATIONS

The City does not have an effective communication policy, procedure, and request form.

EFFECTIVE COMMUNICATION POLICY, PROCEDURE, AND REQUEST FORM: POSSIBLE SOLUTIONS

While it is not a specific requirement to have an effective communication policy, procedure, and request form, having these will help the City meet the requirements for this section of the Title II Regulations. The City should consider developing and implementing an effective communication policy, procedure, and request form consistent with the Title II Regulations.

Additional information regarding effective communication can be found on the following webpages:

- **ADA Title II Regulations Subpart E - Communications | ADA.gov**
- **ADA Requirements: Effective Communication | ADA.gov**
- **Access for 9-1-1 and Telephone Emergency Services | ADA.gov**
- **Communicating with People Who Are Deaf or Hard of Hearing - ADA Guide for Law Enforcement Officers | ADA.gov**
- **Model Policy for Law Enforcement on Communicating with People Who are Deaf or Hard of Hearing | ADA.gov**

4.1.11 ALTERNATE FORMAT POLICY, PROCEDURE, AND REQUEST FORM

The City is obligated to provide documents in alternate formats for people who have low or no vision or have other print disabilities. Per the Title II Regulations, §35.160(b) General:

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(1) A public entity shall furnish appropriate auxiliary aids and services where necessary to afford qualified individuals with disabilities, including applicants, participants, companions, and members of the public, an equal opportunity to participate in, and enjoy the benefits of, a service, program, or activity of a public entity.

(2) The type of auxiliary aid or service necessary to ensure effective communication will vary in accordance with the method of communication used by the individual; the nature, length, and complexity of the communication involved; and the context in which the communication is taking place. In determining what types of auxiliary aids and services are necessary, a public entity shall give primary consideration to the requests of individuals with disabilities. To be effective, auxiliary aids and services must be provided in accessible formats, in a timely manner, and in a way that protects the privacy and independence of the individual with a disability.

ALTERNATE FORMAT POLICY, PROCEDURE, AND REQUEST FORM: OBSERVATIONS

The City does not have an alternate format policy, procedure, or request form.

ALTERNATE FORMAT POLICY, PROCEDURE, AND REQUEST FORM: POSSIBLE SOLUTIONS

While it is not a specific requirement to have an alternate format policy, procedure, and request form, having these will help the City meet the requirements for this section of the Title II Regulations. The City should consider developing and implementing an alternate format policy, procedure, and request form consistent with the Title II Regulations.

Additional information regarding alternate formats can be found on the following webpages:

- **ADA Title II Regulations Subpart E - Communications | ADA.gov**
- **ADA Requirements: Effective Communication | ADA.gov**
- **Alternative Formats | AskJAN.org**
- **An Explanation of Alternative Formats | SeeWriteHear.com**

4.1.12 DISCLAIMER STATEMENT FOR OTHER ENTITIES' LINKS, FORMS, DOCUMENTS, AND VIDEOS

Per the Title II Regulations, §35.200(a) Requirements for web and mobile accessibility, a public entity shall ensure that the following are readily accessible to and usable by individuals with disabilities:

(1) Web content that a public entity provides or makes available, directly or through contractual, licensing, or other arrangements; and

(2) Mobile apps that a public entity provides or makes available, directly or through contractual, licensing, or other arrangements.

To avoid confusion by the public regarding who is responsible for the accessibility of web and mobile application content that can be accessed from the City website, a disclaimer should be displayed when a link is clicked that opens an external website.

DISCLAIMER STATEMENT FOR OTHER ENTITIES' LINKS, FORMS, DOCUMENTS, AND VIDEOS: OBSERVATIONS

The City does not have a disclaimer statement for hyperlinks on the City's website that redirect to non-City websites for which the City has no obligation to make content accessible.

DISCLAIMER STATEMENT FOR OTHER ENTITIES' LINKS, FORMS, DOCUMENTS, AND VIDEOS: POSSIBLE SOLUTIONS

While it is not a specific requirement to have a disclaimer statement, a disclaimer will make it clear to the public that the City is not responsible for the content on non-City websites. The City should consider developing and implementing a disclaimer statement consistent with the Title II Regulations. An example disclaimer can be found on the **Library of Congress website**.

The City should also review the web content and mobile apps that the City provides or makes available, directly or through contractual, licensing, or other arrangements to verify compliance with the **ADA Title II Regulations, Subpart H – Web and Mobile Accessibility**.

4.1.13 SERVICE ANIMAL GUIDANCE/POLICY

A service animal is defined by the ADA as any dog that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including a physical, sensory, psychiatric, intellectual, or other mental disability. The work or tasks performed by a service animal must be directly related to the individual's disability.

Per the Title II Regulations, §35.136(a), Service Animals, a public entity shall modify its policies, practices, or procedures to permit the use of a service animal by an individual with a disability.

SERVICE ANIMAL GUIDANCE/POLICY: OBSERVATIONS

The City does not have guidance on service animals or a service animal policy.

SERVICE ANIMAL GUIDANCE/POLICY: POSSIBLE SOLUTIONS

While it is not a specific requirement to have guidance on service animals or a service animal policy, having these will help the City meet the requirements for this section of the Title II Regulations. The City should consider developing and implementing a service animal policy, consistent with the Title II Regulations.

Additional information regarding service animals can be found on the following webpages:

- **ADA Title II Regulations §35.136 Service animals | ADA.gov**
- **ADA Requirements: Service Animals | ADA.gov**
- **Frequently Asked Questions about Service Animals and the ADA | ADA.gov**
- **Service Animals and Emotional Support Animals | ADA National Network**

4.1.14 OTHER POWER-DRIVEN MOBILITY DEVICE GUIDANCE/POLICY

Other power-driven mobility device (OPDMD) is defined by the ADA as any mobility device powered by batteries, fuel, or other engines—whether or not designed primarily for use by individuals with mobility disabilities—that is used by individuals with mobility disabilities for the

purpose of locomotion, including golf cars, electronic personal assistance mobility devices, such as the Segway® PT, or any mobility device designed to operate in areas without defined pedestrian routes, but that is not a wheelchair within the meaning of this section.

Per the Title II Regulations, §35.137(b)(1) Use of other power-driven mobility devices, a public entity shall make reasonable modifications in its policies, practices, or procedures to permit the use of OPDMDs by individuals with mobility disabilities, unless the public entity can demonstrate that the class of OPDMDs cannot be operated in accordance with legitimate safety requirements that the public entity has adopted pursuant to §35.130(h).

OTHER POWER-DRIVEN MOBILITY DEVICE GUIDANCE/POLICY: OBSERVATIONS

The City does not have guidance on OPDMDs or an OPDMD policy.

OTHER POWER-DRIVEN MOBILITY DEVICE GUIDANCE/POLICY: POSSIBLE SOLUTIONS

While it is not a specific requirement to have guidance on OPDMDs or an OPDMD policy, having these will help the City meet the requirements for this section of the Title II Regulations. The City should consider developing guidance on OPDMDs and/or implementing an OPDMD policy, consistent with the Title II Regulations.

Additional information regarding OPDMDs can be found on the following webpages:

- **ADA Title II Regulations §35.137 Mobility devices | ADA.gov**
- **ADA Requirements: Wheelchairs, Mobility Aids, and Other Power-Driven Mobility Devices | ADA.gov**
- **Power-Driven Mobility Devices | ADA National Network**

4.1.15 EVENT PLANNING GUIDANCE/POLICY/CHECKLIST

The City hosts several events throughout the year including, but not limited to, Home Run for Shelter Pets, BTX 817 Day, Be Healthy Burleson Annual Run, Founders Day, Fall Fest at the Farm, Christmas on the Farm, Family Valentine Dance, Texas Heritage Festival, and Red, White & BTX. Each of these events needs to be accessible, even if the event location is temporary. Per the Title II Regulations, §35.130(a) General prohibitions against discrimination and §35.149 Discrimination prohibited:

- No qualified individual with a disability shall, on the basis of disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity.

- Except as otherwise provided in §35.150, no qualified individual with a disability shall, because a public entity's facilities are inaccessible to or unusable by individuals with disabilities, be excluded from participation in, or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity.

EVENT PLANNING GUIDANCE/POLICY/CHECKLIST: OBSERVATIONS

The City does not have event planning guidance or an event planning policy and checklist.

EVENT PLANNING GUIDANCE/POLICY/CHECKLIST: POSSIBLE SOLUTIONS

While it is not a specific requirement to have guidance on event planning or an event planning policy and checklist, having these will help the City meet the requirements for this section of the Title II Regulations. The City should consider developing guidance on event planning and/or developing and implementing an event planning policy and checklist consistent with the Title II Regulations.

Additional information regarding event planning and ticket sales can be found on the following webpages:

- **ADA Title II Regulations §35.130 general prohibitions against discrimination | ADA.gov**
- **ADA Title II Regulations §35.150 Existing facilities | ADA.gov**
- **Accessible Meetings, Events & Conferences Guide | Mid-Atlantic ADA Center**
- **A Planning Guide for Making Temporary Events Accessible to People With Disabilities | ADA National Network**
- **ADA Title II Regulations §35.138 Ticketing | ADA.gov**
- **ADA Requirements: Ticket Sales | ADA.gov**
- **Ticketing | ADA National Network**

4.1.16 EMERGENCY MANAGEMENT DOCUMENTS

Per the Title II Regulations §35.130(a), no qualified individual with a disability shall, on the basis of disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity. Accordingly, emergency management programs and services provided by the City to the public must be accessible to individuals with disabilities.

EMERGENCY MANAGEMENT DOCUMENTS: OBSERVATIONS

The City's Emergency Management Plan (2020 Edition) was reviewed in its entirety. The Plan does not have information specific to people with disabilities other than "coordinate special care requirements for disaster victims such as the aged, special needs individuals, and others" and "perform evaluation planning for special needs facilities (schools, hospitals, nursing homes, and other institutions".

EMERGENCY MANAGEMENT DOCUMENTS: POSSIBLE SOLUTIONS

The City's Emergency Management Plan should be updated to adequately address people with disabilities, including but not limited to emergency alerts, community evacuation and transportation, and emergency shelter programs. The City should also consider coordinating with people and organizations within the disability community to better understand the needs and concerns of people with disabilities during emergencies and incorporating this information into the plan.

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Additional information regarding emergency management can be found on the following webpages:

- Emergency Planning | ADA.gov
- An ADA Guide for Local Governments | ADA.gov
- ADA Tool Kit: Emergency Management | Archive.ADA.gov
- Emergency Management Checklist | Archive.ADA.gov
- Emergency Shelters Checklist | Archive.ADA.gov
- Access for 9-1-1 and Telephone Emergency Services | Archive.ADA.gov
- Emergency Preparedness | GPADACenter.org

4.1.17 DESIGN STANDARDS AND ORDINANCES

Per the Title ADA Regulations, §35.151(a)(1) New construction and alternations, each facility or part of a facility constructed by, on behalf of, or for the use of a public entity shall be designed and constructed in such manner that the facility or part of the facility is readily accessible to and usable by individuals with disabilities, if the construction was commenced after January 26, 1992.

As discussed in **Section 1.5 New Construction and Alterations**, scoping and technical requirements for sites, facilities, buildings, and elements are provided in the ADA Standards, and scoping and technical requirements for pedestrian facilities in the public rights-of-way are provided in PROWAG.

DESIGN STANDARDS AND ORDINANCES: OBSERVATIONS

Design Standards

The City's Design Standards Manual (effective November 6, 2008) and Paving Details (dated 10/6/06) were last updated before the final rule for PROWAG became effective on October 7, 2023, and these documents may not reflect the latest scoping and technical requirements in Final PROWAG.

Ordinances

The City Code of Ordinances includes terminology that is inconsistent with the ADA, ADA Standards, and PROWAG, including but not limited to "disabled", "disabled persons", "handicap", "handicapped persons", "handicapped", "physically handicapped", "handicapped parking", and "handicap ramps".

Additionally, several sections within the City Code of Ordinances reference the Americans with Disabilities Act (ADA) and the Texas Accessibility Standards (TAS), including but not limited to:

- § 4-61 Public land and rights-of-way (ROW), C. Curbs, 1. Accessibility states: "Standards shall comply with city regulations, Texas Accessibility Standards (TAS) and the Americans with Disabilities Act (ADA)."
- § 8.4 Credits. (a)(2)(c) states: "Provide adequate accessibility from the adjacent public street(s) in compliance with the Americans with Disabilities Act (ADA) and as approved by the City's Parks and Recreation Director."
- § 8-41 Site design. (j)(2) states: "All pedestrian circulation walks shall be designed to provide access to the disabled in compliance with the Americans with Disabilities Act (ADA), and Texas Accessibility Standards (TAS)."

DESIGN STANDARDS AND ORDINANCES: POSSIBLE SOLUTIONS

Design Standards

The City should review and update the current design documents for consistency with the current version of PROWAG for pedestrian facilities in the public rights-of-way and the ADA Standards for facilities outside the public rights-of-way. The City may also want to consider incorporating information into design documents for common issues, as summarized in **Section 4.3 City-Owned Facility Review**, if specific design guidance is not currently provided.

Ordinances

The City should consider updating all affected ordinances to remove the terms "disabled", "disabled persons", "handicap", "handicapped persons", "handicapped", "physically handicapped", "handicapped parking", and "handicap ramps" and replace with terms that are consistent with the ADA, ADA Standards, and PROWAG including but not limited to "accessible", "disability", "persons with disabilities", "accessible parking", and "curb ramp".

The ADA is the law that protects the civil rights of people with disabilities, while the ADA Standards dictate what is required for a facility to be physically accessible to people with disabilities. If the intent is to address civil rights, the City should reference the law. If the intent is to address physical accessibility, the City should reference the standards. The Texas Accessibility Standards have a few requirements that are more stringent than the federal standards, so it's acceptable to continue referencing the TAS. However, the City should also consider referencing the latest version of the PROWAG for the design and construction of pedestrian facilities in the public rights-of-way. Additionally, the City should consider adopting the latest version of PROWAG into the City's Code of Ordinances, similar to the International Building Code. If PROWAG is adopted by the City, all affected ordinances should be reviewed for consistency with PROWAG.

Additional information regarding Final PROWAG and the ADA Standards can be found on the following webpages:

- **Public Right-of-Way Accessibility Guidelines | Accesss-Board.gov**
- **ADA Standards | Accesss-Board.gov**

4.1.18 OTHER PROGRAMS, SERVICES, AND ACTIVITIES

Per the Title II Regulations, §35.130(a) General prohibitions against discrimination, no qualified individual with a disability shall, on the basis of disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity.

The City provides a variety of additional programs, services, and activities, such as online bill payments, directories, GIS maps, databases, reports, registrations, committees, boards, meeting agendas and minutes, books, videos, forms, and other documents that are available to the public, all of which must be readily accessible to and usable by individuals with disabilities.

OTHER PROGRAMS, SERVICES, AND ACTIVITIES: OBSERVATIONS

A list of observations is provided in **Appendix B**.

OTHER PROGRAMS, SERVICES, AND ACTIVITIES: POSSIBLE SOLUTIONS

The City should also consider reviewing internal documentation, policies, and procedures related to the program, service, or activity to confirm all requirements in §35.130 have been met. A list of possible solutions is provided in **Appendix B**.

4.2 PRIORITIZATION

The following sections outline the methodology for assigning prioritization information to the facilities evaluated for compliance with the ADA standards and guidelines. Each facility type has a different set of parameters outlining the impact of barriers to access to establish barrier-based prioritization for improvements. Additionally, each corridor is given an activity score based on its proximity to common pedestrian generators to establish activity-based prioritization for improvements. These two scores are then aggregated, and the overall score is considered when developing the implementation plan for the proposed improvements.

Note that FHWA and DOJ have not provided any guidance on how to prioritize issues, only that prioritization information should be included as part of the schedule; however, best practices suggest that the prioritization methodology and resulting thresholds be first based on the severity of non-compliance (i.e., dangerous condition) and then second based on the barrier's proximity to pedestrian attractors (e.g., adjacent to a hospital or governmental facility with high daily pedestrian traffic).

4.2.1 BARRIER SCORE FOR FACILITIES

The accessibility condition, or barrier score, for buildings, parks, and amenities is prioritized on a 5-point scale, which is defined in **Table 2.** This prioritization methodology was developed by the Consultant Team to aid the City in determining how the building should be prioritized for improvements based on the severity of non-compliance with ADA.

Signalized and unsignalized intersection curb ramp barriers were prioritized on a 5-point scale that is defined in **Table 3** below. Accessibility barriers related to pedestrian equipment at signalized intersections and pedestrian crossings at intersections were prioritized on separate 5-point scales defined in **Table 4** and **Table 5**, respectively.

The sidewalk corridor evaluations documented conditions and measurements along the pedestrian path of travel within the City right-of-way, which includes the sidewalk, pedestrian street and driveway crossings, and curb ramps. Accessibility barriers associated with sidewalk corridor pavement condition were prioritized on a 5-point scale based on the severity of non-compliance, which is defined in **Table 6**. Obstructions and other barriers to access along the sidewalk corridors were prioritized on a separate 5-point scale shown in **Table 7**. Only existing sidewalks are required to be brought into compliance if issues exist. While a missing sidewalk is not required to be installed where it does not currently exist, the City considers short gaps in the sidewalk network to be non-compliant. Short gaps near existing sidewalks have been documented, assigned a low priority, and included in the cost projections. However, further study may be necessary to identify and prioritize broader gaps in the overall sidewalk network.

The Consultant Team developed this barrier-prioritization methodology, which is one of many factors the City can consider when developing the Transition Plan implementation strategy (see **Sections 6.2 – 6.4** and **Appendix D** for more information).

All compliance elements included in the barrier prioritization schedules are based on requirements from the 2010 ADA Standards for Accessible Design and PROWAG. While every effort will be made to design and implement improvements to be consistent with these standards, the City will provide access to the maximum extent feasible where full compliance is technically infeasible. Barrier priorities were assigned based on DOJ priorities for facility access, previous project experience, and case law regarding the severity of non-compliance.

To determine the barrier priority for each facility, compare the raw data to the criteria in **Tables 2-7**. To do this, start at Priority 1 and determine if any of the criteria apply. If yes, assign the facility a barrier priority of 1. If no, move to Priority 2 and determine if any of the criteria apply. Repeat this process until a barrier priority has been assigned to all intersections and each sidewalk corridor segment.

TABLE 2. BARRIER PRIORITIZATION FACTORS FOR BUILDINGS, PARKS, AND AMENITIES

Barrier Priority	Criteria
1 (high)	Accessible approach and entrance
2 (important)	Access to goods and services.
3 (moderate)	Access to public toilet rooms
4 (low)	Access to other items such as water fountains and public telephones
5 (recommended)	Fully compliant with a previous standard (safe-harbored) but will need to be brought into compliance with a current standard if altered.

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TABLE 3. BARRIER PRIORITIZATION FACTORS FOR CURB RAMPS

Barrier Priority	Criteria
1 (highest)	Missing curb ramps and existing curb ramps with any of the following conditions: ▶ Width < 24 in ▶ Run slope > 15% ▶ Cross Slope > 10% ▶ Turning-space width or length < 24 in ▶ Turning-space Cross Slope > 8% ▶ Turning-space Run Slope > 8% ▶ Clear-space width or length < 24 in ▶ Vertical offset> 1 in ▶ Grade change> 25%
2	Existing curb ramps with any of the following conditions: ▶ Width < 36 in ▶ Run Slope > 10% ▶ Cross slope > 7.5% ▶ Turning-space width or length < 36 in ▶ Turning-space Cross Slope > 5% ▶ Turning-space Run Slope > 5% ▶ Clear-space width or length < 36 in ▶ DWS type is missing or non-compliant ▶ Bypass required but not present ▶ Vertical offset > 0.5 in ▶ Grade Change > 20%
3	Existing curb ramps with any of the following conditions: ▶ Ramp width < 48 in ▶ Ramp running slope > 8.33% ▶ Ramp cross slope > 5% ▶ Flare slope > 10% where flare is present ▶ Turning-space width or length < 48 in ▶ Turning-space cross slope > 2.1% ▶ Turning-space running slope > 2.1% ▶ Clear-space width or length < 48 in ▶ Surface not stable, firm, or slip resistant ▶ Grade break not perpendicular ▶ DWS non-contrasting or dimensionally deficient ▶ Vertical offset > 0.25 in ▶ Grade Change> 13.3% ▶ Multiple moderate deficiencies
4	Existing curb ramps with any of the following conditions: ▶ Ramp cross slope > 2.1% ▶ Non-compliant PROWAG
5 (lowest)	All other curb ramps not prioritized above

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TABLE 4. BARRIER PRIORITIZATION FACTORS FOR PEDESTRIAN SIGNALS

Barrier Priority	Criteria
1 (highest)	Existing pedestrian signal with any of the following conditions: ▶ Button is missing ▶ Signal head is missing
2	Existing pedestrian signal with any of the following conditions: ▶ Button Clear Floor Width < 30 in ▶ Button Clear Floor Length < 48 in ▶ Button Clear Floor Running Slope) > 5% ▶ Button Clear Floor Cross Slope) > 2.1% ▶ Both Button CW Edge Distance > 60 in and Button Curb Edge Distance > 120
3	Existing pedestrian signal with any of the following conditions: ▶ Button height > 48 in ▶ Button is not parallel to crosswalk ▶ Button CW Edge Distance > 60 in ▶ Button Curb Edge Distance > 120 in
4	▶ Pedestrian Head does not show countdown ▶ Not PROWAG compliant
5 (lowest)	All other pedestrian signals not prioritized above

TABLE 5. BARRIER PRIORITIZATION FACTORS FOR CROSSWALKS

Barrier Priority	Criteria
1 (highest)	No crosswalk present
2	Existing crosswalk with any of the following conditions: ▶ Travel path width < 36 in ▶ Cross slope > 8% ▶ Running slope > 10%; ▶ Vertical offset > 0.5 in
3	Existing crosswalk with any of the following conditions: ▶ Vertical offset > 0.25 in ▶ Markings are not present
4	Existing crosswalk with any of the following conditions: ▶ Travel path width < 48 in ▶ Cross slope > 5% ▶ Running slope > 5% ▶ Not PROWAG compliant
5 (lowest)	All other crosswalks not prioritized above

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TABLE 6. BARRIER PRIORITIZATION FACTORS FOR SIDEWALK CORRIDORS

Barrier Priority	Criteria
1 (highest)	Existing sidewalk corridor with any of the following conditions: ▶ Travel Path Width < 24 in ▶ Cross Slope > 7.5% ▶ Vertical Changes > 0.5 in
2	Existing sidewalk corridor with any of the following conditions: ▶ Travel Path Width < 36 in ▶ Cross Slope is between 6% and 7.5% ▶ Running Slope Condition > 10% when sidewalk running slope exceeds the allowable roadway-grade comparison ▶ Vertical Changes > 0.25 in
3	Existing sidewalk corridor with any of the following conditions: ▶ Travel Path Width < 48 in ▶ Cross Slope is between 4.5% and 6% ▶ Running slope condition > 8.33% ▶ Narrow sidewalk with no nearby passing space ▶ Multiple moderate deficiencies
4	Existing sidewalk corridor with any of the following conditions: ▶ Cross Slope is between 2.5% and 4.5% ▶ Compliant with PROWAG ▶ Running slope above 5% when it exceeds adjacent roadway grade by more than the configured tolerance
5 (lowest)	All other sidewalk corridors not prioritized above, including: ▶ Compliant sidewalk ▶ Sidewalk with minor or de minimis barriers only (e.g. cross slope between 2.1% and 2.5%)

TABLE 7. BARRIER PRIORITIZATION TABLE FOR ACCESS BARRIERS

Barrier Priority	Criteria
1 (highest)	Travel path width < 24 in
2	Travel path width < 36 in
3	Pole barrier present
4	Barrier representing any of the following conditions: ▶ Travel path width < 48 in ▶ Vegetation barrier present ▶ Any other populated barrier type not otherwise assigned higher
5 (lowest)	No width restriction and no stronger barrier-type condition applies

4.2.2 ACTIVITY SCORE FOR PUBLIC RIGHTS-OF-WAY FACILITIES

Activity scores were calculated for each intersection and sidewalk corridor based on a variety of factors, including the proximity to common pedestrian generators, such as parks, public or government buildings, and schools. Further tabulations considered the primary road classification, public feedback, and socioeconomic factors.

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The criteria for calculating a corridor's activity score are shown in **Table 8**. The activity score methodology for each subtable (**a-j)** is as described below:

a) **Government Buildings**: All locations were assigned a value based on **Table 8a** and their proximity to a government building. This value was multiplied by a weight of 15, resulting in a score ranging from 0 to 15 based on the proximity to a government building. If a sidewalk intersected two government buildings, the higher of the two was utilized.

b) **Transit/Bus stops:** All locations were assigned a value based on **Table 8b** and their proximity to a transit stop. The value was multiplied by a weight of 10, resulting in a score ranging from 0 to 10 based on the proximity to a transit stop. If a sidewalk stratified two transit stops, the higher of the two was used.

c) **Hospitals / Medical Centers:** All locations were assigned a value based on Table **8c** and their proximity to a hospital. This value was multiplied by a weight of 5, resulting in a score ranging from 0 to 5 based on the proximity to a hospital or medical center. If a sidewalk stratified hospitals or medical centers, the higher of the two was used.

d) **Functional Classification / Street Classification:** All locations were assigned a value based on the adjacent street on which they were located. This value was multiplied by a weight of 5 to assign a score ranging from 0 to 5 as shown in **Table 8d**. Types of streets were categorized according to the following values:
   - Principal Arterial
   - Minor Arterial
   - Collector
   - Local

e) **School Sites:** All locations were assigned a value based on **Table 8e** and their proximity to a school site. This value was multiplied by a weight of 10, resulting in a score ranging from 0 to 10 based on the proximity to a school site. If a sidewalk stratified two school sites, the higher of the two was used.

f) **Grocery Stores:** All locations were assigned a value based on **Table 8f** and their proximity to a grocery store. This value was multiplied by a weight of 5, resulting in a score ranging from 0 to 5 based on the proximity to a grocery store. If a sidewalk stratified two grocery store locations, the higher of the two was used.

g) **Parks and Trails:** All locations were assigned a value based on **Table 8g** and their proximity to a park. The value was multiplied by a weight of 5, resulting in a score ranging from 0 to 5 based on the proximity to a park. If a sidewalk stratified two parks, the higher of the two was used.

h) **Public Comment:** All locations were assigned a value based on **Table 8h** and whether it had received public comment. The value was multiplied by the weight of 20, resulting in a score ranging from 0 to 20.

i) **Libraries / Community Centers:** All locations were assigned a value based on **Table 8i** and their proximity to a library or community center. This value was multiplied by a weight of 5, resulting in a score ranging from 0 to 5 based on the proximity to a library/community center. If a sidewalk stratified two libraries or community centers, the higher of the two was used.

j) **Social Vulnerability Index:** All locations were assigned a value based on **Table 8j** based on the census tract that the location fell within, and the tract's score under the **CDC's Social Vulnerability Index (SVI)**. The value was multiplied by the weight of 15, resulting in a score ranging from 0 to 15.

TABLE 8. CORRIDOR ACTIVITY SCORES

SCORING MATRIX - LOCATION EVALUATION CRITERIA

a) Government Buildings			
Grade	Proximity	Value	Weight
A	1,000 feet	1	15
B	1,000 - 2,000 feet	0.7	
C	2,000 - 3,500 feet	0.4	
D	3,500 - 5,000 feet	0.1	
F	> 5,000 feet	0	

b) Transit/Bus Stops			
Grade	Proximity	Value	Weight
A	1,000 feet	1	10
B	1,000 - 2,000 feet	0.7	
C	2,000 - 3,500 feet	0.4	
D	3,500 - 5,000 feet	0.1	
F	> 5,000 feet	0	

c) Hospitals & Medical Centers			
Grade	Proximity	Value	Weight
A	1,000 feet	1	5
B	1,000 - 2,000 feet	0.7	
C	2,000 - 3,500 feet	0.4	
D	3,500 - 5,000 feet	0.1	
F	> 5,000 feet	0	

d) Road Classification			
Grade	Classification	Value	Weight
A	Principal Arterial	1	5
B	Minor Arterial	0.7	
C	Collector	0.4	
D	Local	0.1	
F	Private: Cul-De-Sacs/Roads/Dead Ends	0	

e) Schools			
Grade	Proximity	Value	Weight
A	1,000 feet	1	10
B	1,000 - 2,000 feet	0.7	
C	2,000 - 3,500 feet	0.4	
D	3,500 - 5,000 feet	0.1	
F	> 5,000 feet	0	

f) Grocery Stores			
Grade	Proximity	Value	Weight
A	1,000 feet	1	5
B	1,000 - 2,000 feet	0.7	
C	2,000 - 3,500 feet	0.4	
D	3,500 - 5,000 feet	0.1	
F	> 5,000 feet	0	

g) Parks & Trails			
Grade	Proximity	Value	Weight
A	1,000 feet	1	10
B	1,000 - 2,000 feet	0.7	
C	2,000 - 3,500 feet	0.4	
D	3,500 - 5,000 feet	0.1	
F	> 5,000 feet	0	

h) Public Comment			
Grade	Mention	Value	Weight
A	Disabled Person or Group	1	15
B	More than 5 comments from different individials about same loca	0.7	
C	Request from one person	0.4	
D	Aesthetic/Cosmetic	0.1	
F	No comments	0	

i) Libraries/Community Centers/Churches			
Grade	Proximity	Value	Weight
A	1,000 feet	1	10
B	1,000 - 2,000 feet	0.7	
C	2,000 - 3,500 feet	0.4	
D	3,500 - 5,000 feet	0.1	
F	> 5,000 feet	0	

j) Social Vulnerability Index			
Grade	Percentile	Value	Weight
A	>80th Percentile	1	15
B	60th-80th Percentile	0.7	
C	40th-60th Percentile	0.4	
D	20th-40th Percentile	0.1	
F	<20th Percentile	0	

4.2.3 IMPLEMENTATION OF IMPROVEMENTS

To develop a list of recommended improvements for the City of Burleson, public rights-of-way facilities were grouped into corridors. These corridors were ranked by a composite score comprised of a severity score and an activity score. The process for developing the rankings is explained in the following sections.

CORRIDOR CREATION

First, facilities were grouped to create corridors. Corridors are defined as all sidewalks, curb ramps, and driveway and pedestrian street crossings along both sides of a street that are within the jurisdiction of the City of Burleson. For each corridor, the severity and activity scores for each facility present were averaged together to develop a combined corridor composite score.

CORRIDOR SEVERITY SCORES

Next, each sidewalk segment and curb ramp facility was assigned a severity score based on the criteria described in **Section 4.2.1**.

The corridor severity score is an average score of all facilities present and their individual severity scores along a given corridor. The severity score is on a scale of 0 to 100 points, with

100 points having the greatest severity of barriers to accessibility and categorized as Priority 1 (High).

CORRIDOR ACTIVITY SCORES

Next, each sidewalk segment and curb ramp facility was assigned an activity score based on the criteria described in **Section 4.2.2.** The activity score can sum to a total of 100 points, with 100 points being the closest to pedestrian attractors and categorized as Priority 1 (High).

The corridor activity score is an average score of all facilities present and their individual activity scores along a given corridor.

CORRIDOR COMPOSITE SCORES

Next, each corridor was assigned a composite score by averaging the corridor severity scores and corridor activity scores together.

The corridors with a high composite score would generally have both a higher severity score and activity score. This indicates both poor condition and factors that would indicate higher pedestrian activity.

CORRIDOR PRIORITIZATION

Finally, corridors were ranked in order of composite score. The corridor rankings are included in the Project's GIS database package.

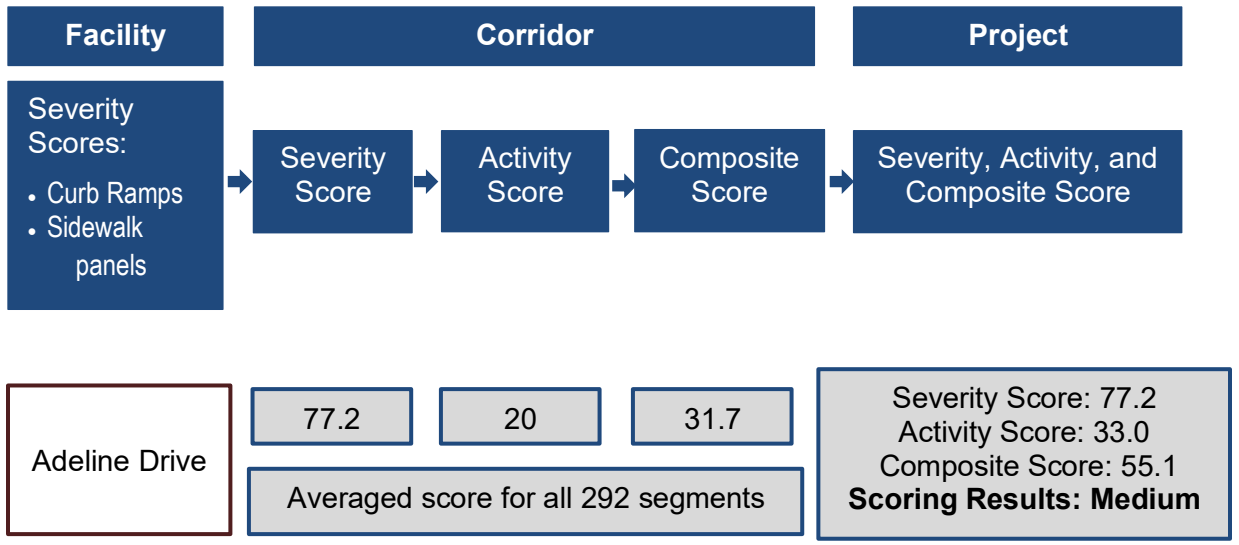
The rankings are displayed with a list of all corridors in the City of Burleson, which were grouped into three tiers based on composite scores:

- High Score (Composite Score of 60 or above)
- Median Score (Composite Score between 40 and 60)
- Low Score (Composite Score of 40 or below)

The composite scores for each corridor are shown in the Project's GIS database package.

***Example** Project Prioritization Scoring*

To determine final project prioritization, a facility must first be evaluated for severity score, followed by activity score. For example, Adeline Drive is comprised of 292 individual segments, allowing independent assessment of existing conditions depending on the facility type (such as curb ramps, sidewalk panels, or traffic signal push buttons). Adeline Drive's corridor was first assessed for sidewalk severity score using **Tables 5** and **6**, which produced an average score of 77.2. Next, the corridor was evaluated for activity score based on **Table 9**, resulting in an average score of 33.0. The average of the two scores generated a composite score of 55.1. Adeline Drive was categorized as Medium, as the project composite score was between 40 and 60 (see **Project's GIS database package**).



4.3 CITY-OWNED FACILITIES REVIEW

As part of this ADA Transition Plan, the City of Burleson evaluated City-owned and maintained public facilities to identify barriers that may limit access for individuals with disabilities. Title II of the Americans with Disabilities Act requires public entities to provide programs, services, and activities in a manner that is accessible to all users. Because public facilities serve as locations where residents access City services, programs, and community resources, these facilities were assessed to evaluate compliance with applicable accessibility standards and to identify opportunities for barrier removal.

The facility evaluations included exterior and interior elements associated with public access, such as accessible parking, building entrances, pedestrian circulation routes, restrooms, service counters, signage, sidewalks, curb ramps, pedestrian street crossings, signalized intersections and other amenities. Identified barriers were documented and incorporated into the City's ADA Transition Plan to support future planning, budgeting, and implementation efforts.

Coordination with TxDOT Facilities

Certain pedestrian facilities within the City are located along roadways owned and maintained by the Texas Department of Transportation (TxDOT), including portions of SH 174 and FM 3391. These facilities have been evaluated through TxDOT's Comprehensive Accessibility Program (TCAP) and are addressed through TxDOT's ADA Transition Plan.

Because these pedestrian facilities fall under TxDOT jurisdiction, the City of Burleson will coordinate with TxDOT regarding accessibility improvements along state-maintained roadways. Recommendations and improvements associated with sidewalks, curb ramps, pedestrian crossings, and related infrastructure within TxDOT right-of-way should be implemented through coordination between the City and TxDOT and will be considered in conjunction with TxDOT's ongoing accessibility planning and improvement programs.

City of Burleson Evaluated Facilities

A Self-Evaluation was conducted on the following facilities:

- 17 buildings
- 21 parks
- 8 miles of paved trails
- 24 signalized intersections
- 218 miles of sidewalk corridors and all unsignalized intersections, driveways, and pedestrian at-grade railroad crossings along the sidewalk corridor

The following sections summarize the observations.

4.3.1 BUILDINGS

17 buildings within the City of Burleson were evaluated for compliance with the ADA Standards in effect at the time of construction. All buildings included in the evaluation are listed in **Table 9** and shown on the map in **Appendix C**.

TABLE 9. SUMMARY OF BUILDINGS REVIEWED

Building Name	Building Address
1. Animal Shelter	775 SE John Jones Drive
2. Burleson Memorial Cemetery	580 Memorial Plaza
3. Burleson Recreation Center (BRiCk)	550 NW Summercrest Boulevard
4. Burleson Visitors Center	124 W Ellison Street
5. City Hall	141 W Renfro Street
6. City Hall Annex	141 W Renfro Street
7. Fire Station #1	828 SW Alsbury Blvd
8. Fire Station #16	250 E Hidden Creek Parkway
9. Fire Station #3	245 Lakewood Drive
10. Hidden Creek Golf Course	555 E Hidden Creek Parkway
11. Library	248 SW Johnson Avenue
12. Mayor Vera Calvin Plaza in Old Town	141 W Renfro Street
13. Municipal Court	1131 SW Wilshire Boulevard

Building Name	Building Address
14. Police Department (Exterior Only)	1161 SW Wilshire Blvd
15. Russell Farm	405 W County Road 714
16. Senior Activity Center	216 SW Johnson Avenue
17. Service Center	725 SE John Jones Road

BUILDINGS: SELF-EVALUATION OBSERVATIONS

Areas evaluated for each building included parking lots, the 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 observations is provided in the building facility reports**.** Common observations included:

- Doors close too quickly and exceed the maximum allowable opening force.
- Accessible path of travel has cross slopes greater than 2%.
- Wall signs incorrectly located or non-compliant.
- Elements out of reach range.

BUILDINGS: POSSIBLE SOLUTIONS

A complete list of possible solutions is provided in the building facility reports.

4.3.2 PARKS

21 parks and approximately seven (7) miles of park trails within the City of Burleson were evaluated for compliance with the ADA Standards that were in place at the time of construction. All parks included in the evaluation are listed in **Table 10** and shown on the map in **Appendix C**.

TABLE 10. SUMMARY OF PARKS REVIEWED

Park Name	Park Address
1. Bailey Lake Park	280 W Hidden Creek Parkway
2. Bartlett Park and Soccer Complex	550 NW Summercrest Boulevard
3. Burleson Bark Park	616 Memorial Plaza
4. Cedar Ridge Park	716 Cumberland Drive
5. Centennial Park	308 NE McAlister Road
6. Chisenhall Sports Complex and Trails	500 W Hidden Creek Parkway
7. Cindy Park	205 NE Cindy Lane
8. Clark Park	124 N Clark Street
9. Claudia's Playground	933 West Bend Boulevard
10. Elk Ridge Park	1016 Dorsey Street
11. Heberle Park and Trail	812 Tyler Court
12. Hidden Vistas Park	950 Hidden Vistas Boulevard
13. Meadowcrest Park	1050 Barracuda Drive

Park Name	Park Address
14. Mistletoe Hill Park	960 NE McAlister Road
15. Oak Valley Park North & Shared-Use Path	804 Parkridge Boulevard
16. Prairie Timber Park	801 Prairie Timber Road
17. Robert Joseph Park	2780 Greenridge Drive
18. Veterans Memorial Park	298 E Renfro Street
19. Wakefield Heights Park	704 Elizabeth Drive
20. Warren Park	301 SW Johnson Avenue
21. Willow Creek Park	151 Hawks Ridge Trail

PARKS: SELF-EVALUATION OBSERVATIONS

Areas evaluated for each park included parking lots, the path of travel from the parking lot to the park amenities, access into facilities, signage, drinking fountains, and restrooms. A complete list of observations is provided in the park facility reports. Common observations included:

- Elements out of reach range.
- Accessible route or clear floor space not provided.
- Non-compliant restrooms and restroom accessories.
- Walkway contains cracking, sinking, and heaving.
- Non-compliant drinking fountains.

PARKS: POSSIBLE SOLUTIONS

A complete list of possible solutions is provided in the park facility reports.

4.3.3 SIGNALIZED INTERSECTIONS

Twenty-Four (24) signalized intersections within the City of Burleson were evaluated for compliance with PROWAG. Signalized intersection evaluations cataloged the conditions and measurements along the pedestrian circulation path, which includes street crossings, curb ramps, sidewalk adjacent to the curb ramps, and pedestrian signal equipment and adjacent clear spaces.

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

SIGNALIZED INTERSECTIONS: SELF-EVALUATION OBSERVATIONS

Common curb ramp observations included excessive landing running slopes and cross slopes, excessive grade between curb ramp and gutter/street, and excessive curb ramp running slopes and cross slopes. **Table 11** provides a summary of the curb ramp observations at signalized intersections.

Common issues associated with the existing pedestrian push buttons included push buttons installed at locations inconsistent with PROWAG, excessive push button clear cross slopes, and excessive push button heights. **Table 12** provides a summary of the push button issues.

SIGNALIZED INTERSECTIONS: POSSIBLE SOLUTIONS

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

TABLE 11. SUMMARY OF CURB RAMP OBSERVATIONS AT SIGNALIZED INTERSECTIONS

Curb Ramp Element	Number Evaluated	Number Compliant	Percent Compliant
Width of pedestrian access route crossing median/pedestrian refuge island ≥ 60”	1	1	100%
Curb ramp present where curb ramp is required	110	110	100%
Curb ramp landing exists	110	110	100%
Curb ramp flare slope parallel to curb line ≤ 10.0%	110	103	94%
Curb ramp width ≥ 48”	110	99	90%
Curb ramp running slope ≤ 8.3%	110	97	88%
Detectable warning surface exists	110	81	74%
Curb ramp landing cross slope ≤ 2.1%	110	68	62%
Curb ramp landing running slope ≤ 2.1%	110	68	62%
Curb ramp cross slope ≤ 2.1%	110	67	61%
Change of grade between curb ramp and gutter/street ≤ 13.3%	110	48	44%
Detectable warning surface is compliant	81	31	38%

TABLE 12. SUMMARY OF PUSH BUTTON OBSERVATIONS

Push Button Element	Number Evaluated	Number Compliant	Percent Compliant
Clear space is ≥ 30" x 48"	91	91	100%
Push button present where needed	91	91	100%
Pedestrian head present where needed	82	82	100%
Push button offset from crosswalk ≤ 5 ft	91	82	90%
Push button height ≤ 48”	91	80	88%
Cross slope of the clear space ≤ 2.1%	80	69	86%
Push button offset from curb ≤ 10’	91	62	68%

4.3.4 SIDEWALK CORRIDORS

The sidewalk corridor evaluations documented conditions and measurements along the pedestrian path of travel within the City right-of-way, which includes the sidewalk, pedestrian street and driveway crossings, curb ramps, and at-grade pedestrian railroad crossings. Approximately 218 miles of sidewalk corridors and 8 miles of paved trails were evaluated for compliance with PROWAG. A map of the evaluated sidewalk corridors is provided in **Appendix C**.

SIDEWALK CORRIDORS: SELF-EVALUATION OBSERVATIONS

Common observations along the sidewalk corridors were excessive pedestrian access route cross slopes, vertical surface discontinuities that caused excessive level changes, and temporary obstructions in the pedestrian circulation path such as weeds and low-hanging branches. Where excessive vegetation was present, field crews attempted to assess the condition of the underlying sidewalk. Where possible, the condition of the underlying sidewalk was recorded; however, the City of Burleson may find additional compliance concerns with the sidewalk once the temporary obstruction is removed.

Common curb ramp observations at unsignalized intersections and driveways along the sidewalk corridors included the absence of color contrast or texture contrast (detectable warning surfaces), excessive slopes where the curb ramp meets the roadway, and curb ramps with excessive landing cross slopes. A summary of the unsignalized intersection and driveway curb ramp observations is provided in **Table 13.**

ADA Title II Regulations (28 CFR Part 35), Section 35.150, Existing Facilities, requires that the Transition Plan include a schedule for providing curb ramps or other sloped areas where pedestrian sidewalks cross curbs, giving priority to walkways serving entities covered by the ADA, including state and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas.

SIDEWALK CORRIDORS: POSSIBLE SOLUTIONS

PROWAG defines a crosswalk as “that part of a roadway that is located at an intersection included within the connections of the lateral lines of the pedestrian circulation paths on opposite sides of the highway measured from the curbs, or in the absence of curbs, from the edges of the traversable roadway, and in the absence of a pedestrian circulation path on one side of the roadway, the part of a roadway included within the extension of the lateral lines of the pedestrian circulation path at right angles to the center line; or at any portion of a roadway at an intersection or elsewhere distinctly indicated as a pedestrian crossing by pavement marking lines on the surface. Crosswalks at intersections may be marked or unmarked.”

Curb ramps, blended transitions, or a combination of curb ramps and blended transitions should be provided in accordance with PROWAG. If a pedestrian crossing is prohibited or not intended, the crosswalk should be closed in accordance with PROWAG. The requirements are summarized in the sections below.

CROSSWALKS AT INTERSECTIONS

At an intersection corner, one curb ramp or blended transition shall be provided for each crosswalk, or a single blended transition that spans all crosswalks at the intersection corner may be provided. In alterations, where existing physical constraints make compliance with PROWAG technically infeasible, a single curb ramp shall be permitted at the apex of the intersection corner. When alterations are made to crosswalks, curb ramps or blended transitions shall be provided on both ends of the crosswalk where the pedestrian access route crosses a curb.

At an intersection corner where pedestrian crossing is prohibited, curb ramps or blended transitions shall not be provided. 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).

MID-BLOCK AND ROUNDABOUT CROSSWALKS

At a mid-block or roundabout crosswalk, curb ramps or blended transitions shall be provided on both ends of the crosswalk. When alterations are made to crosswalks, curb ramps or blended transitions shall be provided on both ends of the crosswalk where the pedestrian access route crosses a curb.

At a mid-block or roundabout crosswalk where pedestrian crossing is not intended, curb ramps or blended transitions shall not be provided. 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).

CROSSWALK MARKINGS

For all existing marked crosswalks at unsignalized intersections, crosswalk markings are recommended for replacement where they currently exist but are worn, do not meet minimum width requirements, or will need to be replaced due to compliance issues with the underlying pavement. The 11th edition of the MUTCD guidance states that on approaches controlled by STOP or YIELD signs, crosswalk markings should be installed where engineering judgment indicates they are needed to direct pedestrians to the proper crossing path(s). At uncontrolled approaches, an engineering study should be performed before a marked crosswalk is installed.

A complete list of possible solutions can be found in the sidewalk and unsignalized intersection/driveway facility reports.

TABLE 13. SUMMARY OF CURB RAMP OBSERVATIONS AT UNSIGNALIZED INTERSECTIONS

Curb Ramp Element	Number Evaluated	Number Compliant	Percent Compliant
Curb ramp landing exists	2,424	2,378	98%
Curb ramp present where curb ramp is required	3,038	2,424	80%
Curb ramp running slope ≤ 8.3%	2,424	1,879	78%
Curb ramp width ≥ 48”	2,424	1,775	73%
Width of pedestrian access route crossing median/pedestrian refuge island ≥ 60”	11	7	64%
Curb ramp flare slope parallel to curb line ≤ 10.0%	260	163	63%
Curb ramp landing running slope ≤ 2.1%	2,424	1,310	54%
Curb ramp cross slope ≤ 2.1%	2,424	1,261	52%
Curb ramp landing cross slope ≤ 2.1%	2,424	1,251	52%
Detectable warning surface exists	2,424	1,211	50%
Change of grade between curb ramp and gutter/street ≤ 13.3%	2,424	1,078	44%
Detectable warning surface is compliant	1,211	513	42%

4.3.5 PEDESTRIAN AT-GRADE RAILROAD CROSSINGS

Thirteen (13) pedestrian at-grade railroad crossings along the sidewalk corridors were evaluated for compliance with PROWAG. Railroad crossing evaluations cataloged the conditions and measurements along the pedestrian circulation path across the railroad tracks, including transitions to and from adjacent pedestrian circulation paths, flangeway gap width, and detectable warning surfaces.

All pedestrian at-grade railroad crossings included in the evaluation are shown on a map included in **Appendix C**.

PEDESTRIAN AT-GRADE RAILROAD CROSSINGS: SELF-EVALUATION OBSERVATIONS

Table 14 provides a summary of the observations at evaluated railroad crossings.

TABLE 14. SUMMARY OF OBSERVATIONS AT RAILROAD CROSSINGS

Railroad Crossing Element	Number Evaluated	Number Compliant	Percent Compliant
Detectable warning surface extends the full width of the pedestrian circulation path (when crossing is not located within a street)	13	13	100%
Surfaces: Surface between rails is aligned with top of rail (e.g., concrete panel present at crossing)	13	13	100%
Surfaces: Pedestrian access route surface is level and flush with the top of rail at the outer edges of the rails	13	6	46.1%
Flangeway gap ≤ 3 inches*	26	9	34.6%

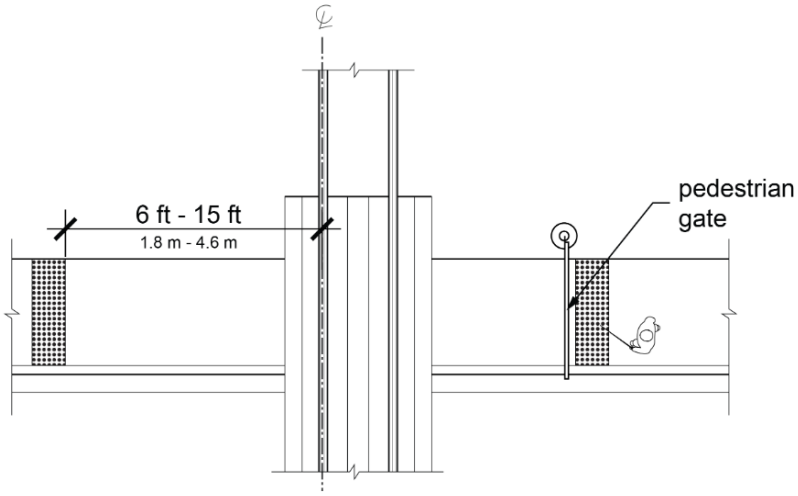
** Assumes the tracks being crossed are subject to safety regulations at 49 CFR part 213, issued by the Federal Railroad Administration.*

PEDESTRIAN AT-GRADE RAILROAD CROSSINGS: POSSIBLE SOLUTIONS

At pedestrian at-grade rail crossings not located within a street, detectable warning surfaces shall be located on each side of the rail crossing. The edge of the detectable warning surface nearest the rail crossing shall be 6 feet minimum and 15 feet maximum from the centerline of the nearest rail. Where pedestrian gates are provided, detectable warning surfaces shall be located on the side of the gate opposite the rail. Pedestrian gates shall not overlap detectable warning surfaces. Detectable warning surfaces should be 24 inches in depth in the direction of pedestrian travel and extend the full width of the pedestrian circulation path.

A complete list of possible solutions can be found in the pedestrian at-grade railroad crossing facility reports.

FIGURE 3. PROWAG FIGURE R305.2.5 PEDESTRIAN AT-GRADE RAIL CROSSINGS



4.4 MAINTENANCE VERSUS ALTERATIONS

The DOJ has issued a briefing memorandum clarifying maintenance versus alteration projects. Information contained in the briefing memorandum is below. It is recommended that this clarification regarding when curb ramp installation is required as part of a project be distributed to the appropriate City of Burleson 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 2*** *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 4. MAINTENANCE VERSUS ALTERATION PROJECTS

ADA Maintenance	ADA Alterations
Crack Filling and Sealing	Open-graded Surface Course
Surface Sealing	Cape Seals
Chip Seals	Mill & Fill/Mill & Overlay
Slurry Seals	Hot In-Place Recycling
Fog Seals	Microsurfacing/Thin Lift Overlay
Scrub Sealing	Addition of New Layer of Asphalt
Joint Crack Seals	Asphalt and Concrete
Joint Repairs	Rehabilitation and Reconstruction
Dowel Bar Retrofit	New Construction
Spot High-Friction Treatments	
Diamond Grinding	
Pavement Patching	

Source: DOJ Briefing Memorandum on Maintenance versus Alteration Projects

5.0 FACILITY CONCEPTUAL BUDGET ESTIMATES

5.1 FACILITY CONCEPTUAL BUDGET ESTIMATE OVERVIEW

To identify funding sources and develop a reasonable implementation schedule, conceptual budget estimates for only the facilities evaluated were developed for each facility type. Conceptual budget estimates for buildings, recreational facilities, and parks were based on construction resources such as Marshall & Swift, RS Means, Consultant's experience with past costs for similar projects, City cost indexes, consulting with local specialty contractors, City-provided information, and assumptions regarding future economic conditions. Conceptual budget estimates for public rights-of-way facilities were based on recent bid tabulations from the Texas Department of Transportation (TxDOT) construction projects.

"Conceptual Budget Estimates" include only individual accessibility improvements and refer to the estimated cost of labor and materials for a specific ADA compliance modification, excluding any additional costs for overhead, profit, or project contingencies. Conceptual budget estimates represent the direct expenses associated with performing the modification itself. The cost of other components will be determined by the project manager or the design professional, including but not limited to project administration, construction mobilization, material testing, design analysis, design, plan review, or contractor costs for the overall project.

A contingency percentage (20%) was added to the subtotal to account for future increases in unit prices, in addition to an engineering design percentage (15%). All costs are in 2026 dollars. **Table 15** provides a summary of the conceptual budget estimates to bring each facility into compliance.

TABLE 15. SUMMARY OF CONCEPTUAL BUDGET ESTIMATES

City-Owned Facility Type	Total*
Buildings	$536,500
Parks	$497,000
Public Rights-of-Way Sidewalk	$60,778,500
Public Rights-of-Way Pedestrian Signals	$143,000
Public Rights-of-Way Signalized and Unsignalized Curb Ramps	$16,281,500
Public Rights-of-Way Missing Curb Ramps	$4,298,000
Public Rights-of-Way Crosswalk	$2,850,000
Public Rights-of-Way Access Barriers	$92,500
Railroad Crossings	$660,000
City Totals	**$86,137,000**

**Table values are rounded for simplification*

The facility conceptual budget estimates in **Table 15** include only the budget to remediate accessibility non-compliance as determined by a visual inspection of the facilities. Additional budget considerations should be given to the following:

- Aesthetic upgrades, such as remodeling/upgrading of outdated facilities.
- Current market conditions that may affect pricing of construction materials and labor.

- 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

Table 16 details the conceptual budget estimates and proposed implementation schedule by facility type for all City-owned facilities evaluated. Actual annual budgets will vary to accommodate project scopes. For example, all barriers at a single intersection are recommended to be removed within the same project scope. Because conceptual budget estimates vary by intersection, the actual annual budget may vary to accommodate all improvements at an intersection. This 25-year plan will serve as the implementation schedule for the Transition Plan. The City of Burleson 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.

The City intends to have its ADA/504 Coordinator work together with department heads and budget staff to determine the funding sources for barrier removal projects. Once funding is identified, the ADA/504 Coordinator will coordinate the placement of the projects in the Capital Improvement Program (CIP) for fiscal-year funding.

TABLE 16. IMPLEMENTATION SCHEDULE

Facility Type	Conceptual Budget Estimate	Implementation Schedule (years)	Approximate Annual Budget*
Buildings	$536,500	12	$50,000
Parks	$497,000	8	$70,000
Public Rights-of-Way Sidewalk	$60,778,500	25	$2,430,000
Public Rights-of-Way Pedestrian Signals	$143,000	5	$30,000
Public Rights-of-Way Signalized and Unsignalized Curb Ramps	$16,281,500	20	$820,000
Public Rights-of-Way Missing Curb Ramps	$4,298,000	15	$300,000
Public Rights-of-Way Crosswalk	$2,850,000	15	$200,000
Public Rights-of-Way Access Barriers	$92,500	3	$30,000
Railroad Crossings	$660,000	12	$55,000
City Totals	**$86,136,000**		
		Approximate Annual Budget**	**$4,000,000**

**Table values are rounded for simplification*

***Note that annual budget will vary as improvements are implemented over time*

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, state, and local levels. The following sections detail some different funding source options.

5.3.1 FEDERAL AND STATE FUNDING

Federal and state funding is available for the City to apply through numerous agencies for various improvements. A summary of the available funding opportunities is available on the FHWA website. View the **FHWA Pedestrian Funding webpage**.

Most of these programs are competitive-type grants; therefore, the City of Burleson 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 aimed at revitalization, 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 pre-development 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

6.0 TRANSITION PLAN

Per the ADA Regulations §35.150 Existing Facilities, the City is not required to make structural changes in existing facilities where other methods are effective in achieving compliance. If structural changes to facilities will be undertaken to achieve program accessibility, the City is required to develop a transition plan setting forth the steps necessary to complete such changes. The transition plan shall, at a minimum:

- Identify physical obstacles in the City's facilities that limit the accessibility of its programs or activities to individuals with disabilities.
- Describe in detail the methods that will be used to make the facilities accessible.
- Specify the schedule for taking the steps necessary to achieve compliance with this section and, if the time period of the transition plan is longer than one year, identify steps that will be taken during each year of the transition period. Since the City has responsibility and/or authority over streets, roads, or walkways, a schedule for providing curb ramps or other sloped areas where pedestrian walks cross curbs.
- Indicate the official responsible for the implementation of the plan.

6.1 TRANSITION PLAN REQUIREMENTS

The City has identified the physical obstacles that limit the accessibility of City programs and/or activities to individuals with disabilities (see **Section 4.3 City-Owned Facilities Review**). Buildings, recreational facilities, and park remediations will be completed in accordance with the latest version of the ADA Standards. Public rights-of-way facility remediations will be completed in accordance with the latest version of PROWAG. Based on the conceptual budget estimates, the transition period will take longer than one year (see **Section 5.0 Facility Conceptual Budget Estimates**). Accordingly, the following steps to achieve compliance will be taken by the City on an annual basis:

1. Verify that all new projects are consistent with the ADA Standards and PROWAG.
2. Determine if barrier removal will be achieved by one of the following methods:
   - Scheduled maintenance program
   - Scheduled improvement projects
3. For improvements that are not scheduled, develop an implementation strategy.

The official responsible for the implementation of the Burleson ADA Transition Plan will be:

Tommy Ludwig
City Manager
141 W Renfro Street
Burleson, TX 76028-4296
Office: 817-426-9600

6.2 SCHEDULED MAINTENANCE PROGRAM

The City of Burleson intends to remediate the following types of accessibility improvements through the City's annual maintenance program:

- For fiscal year 2027, the City has included a budget of $50,000 to remove accessibility barriers within the City's public building facilities including:
  - Signage adjustments
  - Reach range adjustments
  - Protruding objects
  - Knee and toe clearance at seating areas and other amenities
  - Ensuring surfaces are firm, stable, and slip resistant
- As part of the City's budgeting process for fiscal year 2028, the City intends to review progress on removal of barriers to access made in fiscal years 2026 and 2027 and identify additional funding and priorities for improvement based on the prioritization methodology discussed in **Section 4.2 Prioritization**.

6.3 SCHEDULED IMPROVEMENT PROJECTS

The City of Burleson has developed a 5-year CIP. The City will confirm that all CIP project scopes and design plans incorporate the accessibility improvements identified in **Section 4.3 City-Owned Facilities Review**. Upcoming CIP projects that incorporate accessibility improvements include:

- Neighborhood Street Rebuild Program
- Renfro & Johnson Pedestrian Improvements
- Elk, Hillside & FM731 Pedestrian & Intersection Improvements Ph 2
- FM 1902 and CR 910 Pedestrian Mobility
- Alsbury Ph 3
- Hulen Widening (SH174 to Candler)
- Quiet Zone at Dobson Street and County Road 714
- Village Creek Parkway Expansion
- Lakewood Drive Extension
- Wicker Hill and Greenridge Reconstruction
- Hulen St. Extension from SH174 to FM 731
- SH174 HSIP Traffic Signal Improvements
- Burleson Legacy Park
- BRiCk - Locker Room Remodel
- Burleson Legacy Park – Playground
- Village Creek Trail e/o I35W
- Bartlett - Playground Replacement
- Mistletoe Hill Park Improvements
- Chisenhall - Playground Replacement
- Heberle - Park Improvements
- Claudia's Playground - Bathroom Addition
- Police HQ Expansion
- City Hall & PD HQ EV Chargers
- Library Bathroom Renovation

- Fire Station #4

6.4 IMPLEMENTATION STRATEGY

To implement improvements that are not included in the City's current maintenance program or CIP, the City has developed an annual implementation strategy. Minimizing risk for pedestrians is the City's goal when determining the order in which to implement facility improvements. To help prioritize improvements, the City has developed the methodology outlined in **Section 4.2**, which includes barriers to accessibility and an activity score based on proximity to pedestrian generators.

There are several factors that can increase risk at a particular location that the City could also include in their decision-making process, including:

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

The City intends to review the ADA Transition Plan annually, particularly during the development of the annual budget. The factors above will be considered by the City in selecting accessibility improvement projects for implementation.

TECHNICAL INFEASIBILITY

With respect to an alteration of a building or a facility, technical feasibility is something that has little likelihood of being accomplished because existing structural conditions would require removing or altering a load-bearing member that is an essential part of the structural frame; or because other existing physical or site constraints prohibit modification or addition of elements, spaces, or features that are in full and strict compliance with the minimum requirements. In alterations, where compliance with applicable requirements is technically infeasible, the alteration shall comply with the requirements to the maximum extent feasible.

With respect to an alteration of a pedestrian facility in the public rights-of-way, where existing physical constraints make compliance with applicable requirements technically infeasible, compliance with these requirements is required to the maximum extent feasible. Existing

physical constraints include, but are not limited to, underlying terrain, underground structures, adjacent developed facilities, drainage, or the presence of a significant natural or historic feature.

6.5 REMEDIATION TRACKING AND MONITORING

To confirm follow-up on corrective actions required under the Transition Plan, the City will institute an ADA Action Log, documenting its efforts at compliance with the ADA. At a minimum, the Action Log will identify items that are not ADA compliant and will include anticipated completion dates. The ADA Action Log will be updated annually and available upon request. A copy of the current ADA Action Log is provided in **Appendix D**.

7.0 CONCLUSIONS AND NEXT STEPS

The City of Burleson Americans with Disabilities Act (ADA) Self-Evaluation and Transition Plan establishes a long-term framework for improving access to the City's programs, services, activities, facilities, and public rights-of-way. The Plan documents the City's Self-Evaluation process, identifies physical and programmatic barriers, incorporates public input, establishes a methodology for prioritizing improvements, and provides an implementation strategy and schedule to guide continued progress toward accessibility.

Through this process, the City evaluated 17 buildings, 21 parks, approximately 8 miles of paved trails, 24 signalized intersections, approximately 218 miles of sidewalk corridors, and associated unsignalized intersections, driveways, and pedestrian at-grade railroad crossings. The City also reviewed its services, policies, and practices and identified recommended actions related to program accessibility, effective communication, reasonable modifications, web and mobile accessibility, emergency management, accessible events, design standards, ordinances, and other aspects of Title II compliance.

Public engagement was an important component of the planning process. The City collected input through ADA Advisory Committee meetings, a public web survey, and an online map that allowed community members to identify accessibility barriers, safety concerns, connectivity issues, and locations where improvements may be needed. Continued public participation will help the City respond to changing community needs and evaluate implementation priorities over time.

The Plan provides a data-driven framework for prioritizing physical improvements. Barriers were evaluated based on the severity of noncompliance, while public rights-of-way corridors were further assessed using activity-based factors such as proximity to pedestrian generators, public comments, roadway classification, schools, parks, transit stops, community facilities, and social vulnerability indicators. These factors were combined to support corridor-level prioritization and help inform project selection through maintenance programs, capital improvement planning, grant opportunities, and annual budgeting.

Conceptual budget estimates were prepared to help the City understand the general scale of the accessibility improvements identified through the Self-Evaluation. Based on the current facility evaluations, approximately **$86.1 million** in accessibility improvements has been identified in 2026 dollars. These planning-level estimates include a 20 percent contingency and 15 percent engineering design allowance but may vary based on final design, construction conditions, market factors, and other project-specific considerations.

The Plan establishes a 25-year implementation schedule, with shorter implementation periods identified for certain facility types and categories of improvements. Actual annual expenditures and project sequencing may vary based on available funding, project scopes, community needs, reasonable modification requests, and opportunities to incorporate accessibility improvements into other maintenance and capital projects.

Implementation is already underway. The City has allocated $50,000 in Fiscal Year 2027 to address accessibility barriers in public buildings and intends to review its progress during the Fiscal Year 2028 budgeting process to identify additional funding and implementation priorities. The City has also identified planned capital projects through which accessibility improvements may be incorporated.

Certain pedestrian facilities within Burleson are located along TxDOT-owned and maintained roadways, primarily SH 174 and FM 3391. These facilities are addressed through the TxDOT Comprehensive Accessibility Program and TxDOT's ADA Transition Plan. The City will coordinate with TxDOT regarding accessibility improvements to sidewalks, curb ramps, pedestrian crossings, and related infrastructure within TxDOT right-of-way.

The ADA Transition Plan is intended to serve as a living document. As improvements are implemented, the City will continue evaluating priorities, documenting completed work, reviewing changes to its facilities and programs, and incorporating accessibility into its ongoing planning, design, maintenance, operations, and budgeting processes. The City may adjust implementation priorities in response to community input, reasonable modification requests, changes in City programs or facilities, available funding, and opportunities to coordinate improvements with other projects.

Following adoption of this ADA Self-Evaluation and Transition Plan, the City should continue advancing accessibility through the following actions:

- **Integrate accessibility into annual budgeting and capital planning.** Coordinate among the ADA/504 Coordinator, department heads, and budget staff to identify funding sources, program eligible improvements, and incorporate barrier removal into maintenance and capital projects where practical.
- **Use the Plan's prioritization methodology to guide project selection.** Consider barrier severity, activity scores, corridor composite scores, public input, safety considerations, available funding, and opportunities to coordinate improvements with planned projects.
- **Continue implementing programmatic recommendations.** Review and update applicable City policies, procedures, forms, contracts, ordinances, emergency management documents, event-planning practices, and web and mobile content consistent with the findings of the Self-Evaluation.
- **Maintain staff awareness and technical consistency.** Continue staff training and internal coordination so accessibility requirements are incorporated into the design, construction, maintenance, operation, and communication of City programs, services, activities, and facilities.
- **Incorporate accessibility into maintenance and alteration projects.** Evaluate planned work to determine when curb ramps and other accessibility improvements must be included and coordinate barrier removal with broader infrastructure investments when feasible.
- **Coordinate with TxDOT and other responsible entities.** Work with TxDOT regarding pedestrian facilities along state-maintained roadways and coordinate with other outside entities where facility ownership or improvement responsibility is shared.
- **Track and document implementation progress.** Maintain and update the ADA Action Log annually to document completed improvements, remaining barriers, responsible departments, anticipated completion dates, and implementation progress. The current Plan states that the Action Log will be available upon request.
- **Continue public engagement.** Provide ongoing opportunities for residents, stakeholders, and individuals with disabilities to identify accessibility concerns and participate in the City's implementation process.

By carrying out these actions, the City can continue making measurable progress toward accessible programs, services, activities, facilities, and public rights-of-way. This Plan provides a practical roadmap for prioritizing improvements, coordinating responsibilities, allocating resources, documenting progress, and integrating accessibility into the City's ongoing decision-making processes.

APPENDIX

Appendix A: Public Outreach

Online Survey Results

Web Map Survey Results

Appendix B: Programmatic Review

Appendix C: Facility Maps

Buildings

Parks

Signalized Intersections

Public Rights-of-Way Sidewalk Corridors and Railroad Crossings

Appendix D: ADA Action Log