



**City of Roanoke**

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

**September 2025**

Prepared by:

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Expect More. Experience Better.

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*The City of Roanoke has prepared this transition plan with the assistance of the consultant team led by Kimley-Horn and Associates, Inc. The Consultant Team, the ADA Coordinator, and the contributing departments of the City of Roanoke 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 had been narrowed by U.S. Supreme Court decisions.

### **ADAAG – Americans with Disabilities Act Accessibility Guidelines**

Document which contains scoping and technical requirements for accessibility to buildings and facilities by individuals with disabilities under 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 Projects**

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 is composed of more than 40 separate 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 states and territories across the United States and in more than 50 countries around the world. 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 continue to be among the safest and most technologically sound in the world.

### **MUTCD – Manual on Uniform Traffic Control Devices**

By setting minimum standards and providing guidance, the MUTCD ensures uniformity of traffic control devices (TCD) across the nation. 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.

### **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 review shared use paths, which are designed primarily for use by bicyclists and pedestrians for transportation and recreation purposes.

**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.

**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 they are served by qualified professionals. 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 in lieu of adopting the National MUTCD.

## 1.0 INTRODUCTION



### 1.1 PURPOSE

The purpose of this Americans with Disabilities Act (ADA) Compliance Plan is to summarize the activities completed to-date related to ADA compliance and to create a roadmap for the City of Roanoke to complete a Self-Evaluation and develop an ADA Transition Plan. Proposed evaluation criteria, evaluation methodology, reporting capabilities, and prioritization methodology for evaluating and implementing structural improvements was developed based on the applicable ADA Standards and Public Rights-of-Way Accessibility Guidelines (PROWAG) and the details are provided in this document.



### 1.2 LEGISLATIVE MANDATE

The ADA is a civil rights law that mandates equal opportunity for individuals with disabilities. The ADA prohibits discrimination in many areas of public life including access to jobs, public accommodations, government services, public transportation, and telecommunications. Title II of the ADA requires public entities to evaluate current services, policies, and practices, and to operate each program, service, and activity so that it is readily accessible and useable by individuals with disabilities.

The City of Roanoke will undertake a comprehensive evaluation of its services, policies, practices, programs, and activities to determine the extent that individuals with disabilities may be restricted in their access.



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

The City of Roanoke is obligated to observe all requirements of Title I in its employment practices; Title II in its services, policies, and practices; any parts of Titles IV and V that apply to the City and its programs, services, activities, 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. Included in Title II are administrative requirements for all government entities employing more than 50 people. These administrative requirements are:

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

This document describes the process that will be used to complete the evaluation of the City of Roanoke’s services, policies, practices, programs, activities, and facilities, and the process that will be used to develop a Transition Plan for the modification of facilities and public rights-of way to improve accessibility.



## 1.4 DISCRIMINATION AND ACCESSIBILITY

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

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

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

### 1.4.1 PHYSICAL BARRIERS

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

### 1.4.2 PROGRAMMATIC BARRIERS

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

### 1.4.3 ONGOING ACCESSIBILITY IMPROVEMENTS

City services, policies, practices, programs, activities, and facilities evaluated during the initial Self-Evaluation will continue to be evaluated on an ongoing basis, and the ADA Transition Plan will be revised to account for changes that have been or will be completed since the initial Self-Evaluation. This ADA Compliance Plan and subsequent ADA Transition Plan will be posted on the City’s website for review and consideration by the public.

#### 1.4.4 CITY OF ROANOKE APPROACH

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

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

#### 1.4.5 EXCEPTIONS AND EXEMPTIONS

Per the ADA Title II Regulations, a public entity shall operate each PSA so that the service, program, or activity, when viewed in its entirety, is readily accessible to and usable to individual 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. In the event the City determines a proposed action would generate undue financial or administrative burden, create hazardous conditions for other people, or threaten or destroy the historic significance of a historic property, a municipality has a responsibility to communicate and document the decision and the methodology used. If an action would result in such an alteration or such burdens, a municipality shall take any other actions which 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.

##### ***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 should first confirm if the property is a qualified historic building or facility, which is defined by the ADA 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 (<https://npgallery.nps.gov/nrhp>) and the associated geodatabase (<https://irma.nps.gov/DataStore/Reference/Profile/2297306>), there are two registered historical places within the City, and there may be other documentation available not provided on these websites.

- i. Old Continental State Bank
- ii. Central Roanoke Historic District
- iii. Visitor Center and Museum

### **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 persons employed at such facility; the effect on expenses and resources, or the impact otherwise of such accommodation upon the operation of the facility.
- iii. the overall financial resources of the covered entity; the overall size of the business of a covered entity with respect to the number of its employees; the number, type, and location of its facilities; and (iv) the type of operation or operations of the covered entity, including the composition, structure, and functions of the workforce of such entity; the geographic separateness, administrative, or fiscal relationship of the facility or facilities in question to the covered entity.

### **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.



## **1.5 NEW CONSTRUCTION AND ALTERATIONS**

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

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

### **2010 ADA Standards**

The Department of Justice’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 regulations adopted revised, enforceable accessibility standards called the 2010 ADA Standards. On March 15, 2012, compliance with the 2010 ADA Standards was required for new construction and alterations under **Titles II** and **III**. March 15, 2012 is also the compliance date for using the 2010 ADA Standards for program accessibility and barrier removal.

### **Public Rights-of-Way Accessibility Guidelines (PROWAG)**

The U.S. Access Board recently published new guidelines under the ADA and the Architectural Barriers Act (ABA) that address access to sidewalks and streets, crosswalks, curb ramps, pedestrian signals, on-street parking, and other components of public rights-of-way. These guidelines also review shared use paths, which are designed primarily for use by bicyclists and pedestrians for transportation and recreation purposes. 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-Ways Projects) references compliance with the latest version of PROWAG for elimination of barriers for public rights-of-way projects. The Texas Department of Licensing and Regulation (TDLR) adopted Rule §68.102, effective May 15, 2017. The applicable section of the rule states:

- (a) *For public right-of-way projects, in addition to accepting compliance with applicable TAS requirements, the department will also accept compliance with the Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way, published by the Architectural and Transportation Compliance Board (Access Board) on July 26, 2011, 36 CFR Part 1190 or its final adopted guidelines.*

Until the U.S. Department of Transportation (DOT) and DOJ adopt accessibility standards for pedestrian facilities in the public right-of-way, public entities have some degree of flexibility in determining how they will comply with the general obligation under Title II of the ADA (to operate each service, program, or activity so that it is “readily accessible and useable by”

individuals with disabilities). Public entities are not required to adopt the Final PROWAG at this time but may turn to different resources for guidance (e.g., Final PROWAG, DOJ's 2010 ADA Standards for buildings and site, and other accessibility resources). However, it is recommended that the City of Roanoke 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 level.

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

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

The MUTCD defines the standards used by road managers nationwide to install and maintain traffic control devices on all streets, highways, pedestrian and bicycle facilities, and site roadways open to public travel. The MUTCD is published by the FHWA under 23 CFR, Part 655, Subpart F and is a compilation of national standards for all traffic control devices, including road markings, highway signs, and traffic signals. It is updated periodically to accommodate the nation's changing transportation needs and address new safety technologies, traffic control tools, and traffic management techniques. On December 19, 2023, a Final Rule adopting the 11<sup>th</sup> Edition of the MUTCD was published in the Federal Register with an effective date of January 18, 2024.

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



## **1.6 MAINTENANCE VERSUS ALTERATIONS**

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

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 DOJ. DOJ's regulations require accessible planning, design, and construction to integrate people with disabilities into mainstream society. Further, these laws require that public entities responsible for operating and maintaining the public rights-of-way do not discriminate in their programs and activities against persons with disabilities. FHWA's ADA program implements the DOJ regulations through delegated authority to ensure that pedestrians with disabilities have the opportunity to use the transportation system's pedestrian facilities in an accessible and safe manner.

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

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

This approach clearly identifies the types of structural treatments that both DOJ and FHWA agree require curb ramps (when there is a pedestrian walkway with a prepared surface for pedestrian use and a curb, elevation, or other barrier between the street and the walkway) and furthers the goal of the ADA to provide increased accessibility to the public right-of-way for persons with disabilities. This single Federal policy will provide for increased consistency and improved enforcement.

FIGURE 1. MAINTENANCE VERSUS ALTERATION PROJECTS

 <b>ADA Maintenance</b>	 <b>ADA Alterations</b>
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



## 1.7 EXISTING CITY PROGRAMS THAT IMPLEMENT ADA UPGRADES

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

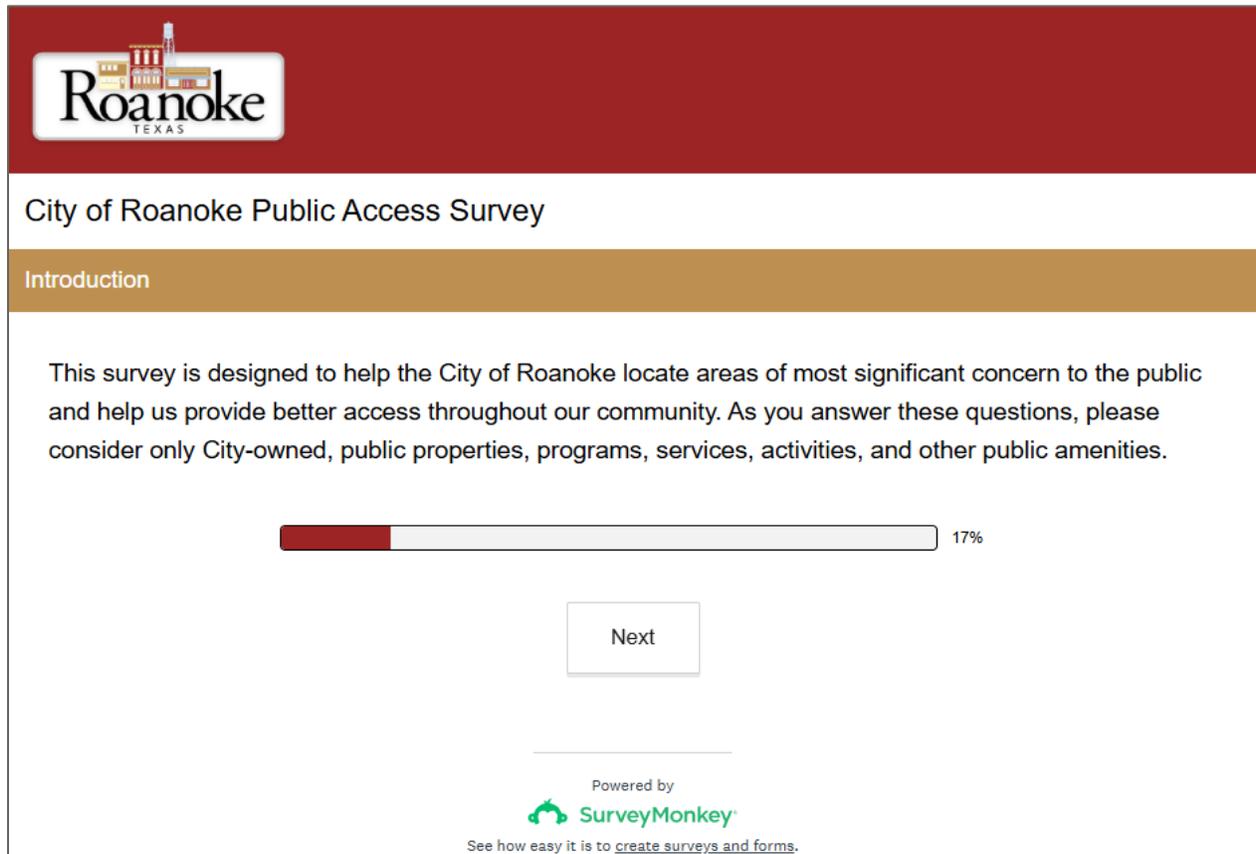
- ▶ The City is undertaking an improvement project in the bathrooms at the Community and Senior Center to enhance accessibility.

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## 2.0 PUBLIC OUTREACH

The City developed a web survey open to the public. The survey was designed to help the City locate areas of greatest concern to the public and help provide better access to the community. The survey was made available via the following link, and feedback was documented between August 18<sup>th</sup>, 2025 and September 5<sup>th</sup>, 2025.

<https://www.surveymonkey.com/r/Roanoke-ADA-Transition-Plan>



City of Roanoke Public Access Survey

Introduction

This survey is designed to help the City of Roanoke locate areas of most significant concern to the public and help us provide better access throughout our community. As you answer these questions, please consider only City-owned, public properties, programs, services, activities, and other public amenities.

17%

Next

Powered by  
 SurveyMonkey

See how easy it is to [create surveys and forms](#).

The web survey was posted on the City's web page, sent out through social media, and included as an insert with public utility billing.

The survey garnered a total of 32 responses.

- ▶ 69% responded positively when asked about barriers in Public Rights-of-Way
- ▶ 79% responded positively when asked about programmatic barriers
- ▶ 92% of respondents believe the City is accommodating of persons with disabilities

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



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## 3.0 SELF-EVALUATION AND SUMMARY OF OBSERVATIONS



### 3.1 SERVICES, POLICIES, AND PRACTICES REVIEW

Under the ADA, the City of Roanoke 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 requirements of the plan, the City must take corrective measures to achieve program accessibility through several methods, including, but not limited to:

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

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

Programs, services, and activities 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 Mayor 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.

Once complete, the City of Roanoke's Self-Evaluation will reflect the results of a comprehensive review of 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.

#### 3.1.1 ADA/504 COORDINATOR

Under the ADA Title II, when a public entity has 50 or more employees based on an entity-wide employee total count, the entity is required to designate at least one (1) qualified responsible

employee to coordinate compliance with ADA requirements. The name, office address, and telephone number of this individual must be available and advertised to employees and the public. This allows for someone to assist with questions and concerns regarding disability discrimination to be easily identified.

The City of Roanoke has appointed Jamie Seil as the ADA/504 Coordinator for Title I and Title II. Below is the ADA Coordinator's contact information.

Jamie Seil, ADA/504 Coordinator

HR Manager

Human Resources

500 S Oak St.

Roanoke, TX 76262

Office: 817-491-2411

Relay: 7-1-1

[humanresources@roanoketexas.com](mailto:humanresources@roanoketexas.com)

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

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

### 3.1.2 ROLES AND RESPONSIBILITIES OF THE ADA/504 COORDINATOR

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

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

The responsibilities of the ADA/504 Coordinator include coordinating the City's efforts to comply with Title II and investigating any complaints related to potential violations of Title II. The role of the ADA Coordinator typically includes being the primary contact when members of the public

request an auxiliary aid or service for effective communication, such as a sign language interpreter or documents in Braille. An effective ADA Coordinator will be able to efficiently assist people with disabilities with their questions. These roles and responsibilities are consistent with the Department of Justice's guidance for "An Effective ADA Coordinator" (<https://www.ada.gov/pcatoolkit/chap2toolkit.htm>).

### 3.1.3 ADA TITLE II GRIEVANCE POLICY, PROCEDURE, AND FORM WITH APPEAL PROCESS

Local governments with 50 or more employees are required to adopt and publish procedures for resolving grievances in a prompt and fair manner that may arise under Title II of the ADA. The purpose of the ADA grievance procedure is to provide a mechanism for the resolution of discrimination issues at the City level, rather than require the complainant to resort to resolution at the federal level. Neither Title II nor its implementing regulations describe what ADA grievance procedures must include; however, the U.S. Department of Justice suggests the following content:

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

The City of Roanoke's ADA grievance policies and procedures were developed in August 2025. Copies of the City's Title II Grievance Procedure and Form are provided in **Appendix B**. It is recommended that the City's Title II ADA Grievance Policy, Procedure, and Form be posted on the City's website.

### 3.1.4 PUBLIC NOTICE UNDER THE ADA

The ADA public notice requirement applies to all state and local governments covered by Title II, including entities with fewer than 50 employees. The target audience for the public notice includes applicants, beneficiaries, and other people interested in the entity's programs, services, and activities. This notice is required to include information regarding Title II of the ADA and how it applies to the programs, services, and activities of the public entity. The Department of Justice suggests including brief statements about:

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

The notice should also include the name and contact information of the ADA/504 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.

DOJ suggested ways to provide notice are provided at: <https://www.ada.gov/pcatoolkit/chap2toolkit.htm>

The City of Roanoke's Public Notice under the ADA was developed in August 2025. A copy of the City's Public Notice is provided in **Appendix B**. Publicizing the ADA notice is not a one-time requirement; the City will provide the information on an ongoing basis, whenever necessary. It is recommended that the City's Public Notice be posted on the City's website



### 3.2 PROGRAMMATIC INVENTORY

The City of Roanoke has compiled a list of all City services, policies, programs, and activities required to be reviewed for compliance with Title II of the ADA. The City plans to evaluate the following for compliance:

- ▶ Department-specific handbooks, policies, procedures, and guidelines,
- ▶ Standard operating procedures
- ▶ Ordinances
- ▶ Reasonable modification request policy, procures, and request form
- ▶ Non-discrimination assurance
- ▶ Non-discrimination language for non-federal contracts, agreements, and waivers
- ▶ Non-discrimination policy statement
- ▶ Alternate format policy, procedure, and request form
- ▶ Effective communication policy, procedure, and request form
- ▶ Meeting agendas and minutes
- ▶ Videos
- ▶ Design standards
- ▶ Emergency management documents
- ▶ Service animal guidance/policy
- ▶ Event planning guidance/policy/checklist
- ▶ Event ticketing guidance/policy
- ▶ Other power-driven mobility device guidance/policy
- ▶ Retaliation and coercion policies

The programmatic inventory is included in **Appendix C**.



### 3.3 SELF-EVALUATION ACTION PLAN

The Federal Highway Administration (FHWA) has provided guidance on the ADA Transition Plan process in their "INFORMATION: ADA Transition Plans" memo dated June 27, 2019 (**Appendix D**). A copy of the memo is available on the FHWA website: <https://highways.dot.gov/civil-rights/programs/ada/ada-transition-plans-memoranda>. While this memo specifically addresses state departments of transportation, FHWA also recommends this guidance for local municipalities until municipality-specific guidance is developed by FHWA. Provided in the memo is a checklist for elements to be included in an ADA Transition Plan and other ADA requirements that agencies must fulfill.

Items included in the FHWA checklist are specific to the public rights-of-way but also apply to other facility types:

- ▶ **Inventory of Barriers** (identification of physical obstacles)
  - ▶ Identify intersection information, including curb ramps and other associated accessibility elements.
  - ▶ Require an Action Plan to develop an inventory of sidewalks (slopes, obstructions, protruding objects, changes in level, etc.), signals (including accessible pedestrian signals), bus stops (bus pads), buildings, parking, rest areas (tourist areas, picnic areas, visitor centers, etc.), mixed use trails, linkages to transit.
  - ▶ Discuss jurisdictional issues/responsibilities for sidewalks.
- ▶ **Schedule**
  - ▶ Show a strong commitment toward upgrading ADA elements identified in the inventory of barriers in the short-term (planned capital improvement projects).
  - ▶ Show a strong commitment over time toward prioritizing curb ramps at walkways serving entities covered by the ADA.
  - ▶ Schedule should include prioritization information, planning, and investments directed at eliminating other identified barriers over time.
  - ▶ Dedicate resources to eliminate identified ADA deficiencies.
- ▶ **Implementation Methods**

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

The City of Roanoke has compiled a list of all City-owned and/or maintained facilities to be evaluated for compliance with applicable ADA Standards and PROWAG. The City's Action Plan to complete the evaluation of these facilities will be completed over an estimated 15-year period and updates to the City's Transition Plan will be made to include observations and possible solutions for identified barriers. Facilities evaluated to date are included in [Section 3.7 City-Owned Facilities Review](#).

### 3.3.1 CITY OF ROANOKE SELF-EVALUATION ACTION PLAN

The second step in completing a Self-Evaluation is developing an Action Plan to evaluate the remaining facilities not already reviewed based on the applicable ADA Standards and PROWAG. This Action Plan should include the identification of evaluation criteria, the development of evaluation methodology and reporting output, and a schedule to complete the evaluations. Best practices for each of these items are detailed in the following sections. Once an Action Plan has been developed, the existing facility Self-Evaluations should be started.

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

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

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

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

### ***Phased Self-Evaluation Approach***

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

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

- ▶ **Number of existing complaints** – Locations with complaints have already been identified by the public as problem areas and should be evaluated as soon as possible to determine if the area(s) of concern are in compliance.
- ▶ **Proximity to pedestrian attractors** – Locations near pedestrian attractors (e.g., hospitals, retirement facilities, medical offices, parking garages, major employers, disability service providers, event facilities, bus or transit stop/routes, schools, government and public facilities, parks, libraries, churches) are more likely to have a higher risk compared to those locations without pedestrian attractors.
- ▶ **Proximity to residential areas** – Locations near residential areas are more likely to have a higher risk than those locations adjacent to industrial areas where pedestrians are less likely to travel.
- ▶ **Number of crashes** – Locations with pedestrian-related crashes should be evaluated to determine if there is a design issue that may be contributing to the crashes (e.g., a push button is not within the required reach range, so pedestrians are not activating the button and crossing the street without a protected phase).
- ▶ **Age of facility** – Facilities constructed after July 26, 1991, are a higher risk than those constructed before the 1991 Standards for Accessible Design were published since they were constructed out of compliance.
- ▶ **Street classification** – Arterials typically have higher pedestrian activity than local roadways and may be a higher risk.
- ▶ **Pedestrian/vehicle volumes** – Higher pedestrian/vehicle volume roadways are more likely to have higher risk than lower volume pedestrian/vehicle roadways. Pedestrian volumes may be quantified using indicators such as number of pedestrian activations as a signalized intersection.
- ▶ **Existing sidewalks** – The ADA does not require sidewalks to be installed, but existing sidewalks must be compliant, and the accessible route maintained in an accessible

condition. Locations with existing sidewalks are a higher risk than locations without existing sidewalks.

- ▶ **Public Input** – Receiving and taking into consideration feedback from the public to better understand their concerns is recommended. While formal complaints may not have been filed, areas of concern to the public are more likely to have a higher risk for litigation if no improvements are made where an issue exists.

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

- ▶ **Spatial distribution of facilities** – Selecting facilities to be evaluated evenly across different areas of the City or Council Districts might be more well-received by the public, assuming all the risk factors above are equal.
- ▶ **Facility type** – Selecting a variety of different facilities (e.g., public rights-of-way, buildings, parks, transit stops) to be evaluated during each phase, instead of all of the same facility type, may provide a better understanding of different types of issues that may exist.
- ▶ **Upcoming Capital Improvement Program (CIP) Projects** – If curb ramps will be completely removed and replaced as part of an upcoming project, the ADA compliance of the new construction should be confirmed during construction inspections and resources would be better spent evaluating curb ramps that are not planned for reconstruction.

The decisions on how to prioritize which facilities to evaluate first is entirely up to the City and may or may not include the factors above. The final step is to execute the Self-Evaluation Action Plan. The Action Plan may be modified as needed during and in between Self-Evaluation phases to account for lessons learned or budget changes.



## 3.4 EXISTING FACILITY INVENTORY

The first step in completing a Self-Evaluation for physical facilities is understanding what facilities the City is responsible for maintaining and where each of these facilities is located. The City completed a facility inventory in 2025 which is summarized in the following sections.

### 3.4.1 BUILDINGS

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

TABLE 1. SUMMARY OF BUILDINGS

Building Name	Building Address
1. Public Works Building 1 & 2	265 Marshall Creek Rd
2. Parks Department	215 James St
3. Future Police Station/Municipal Court	203 Fairway Dr
4. Firehouse 1	201 Fairway Dr
5. Firehouse 2	265 Marshall Creek Rd
6. Municipal Court & Police Station	609 Dallas Dr
7. Public Library	308 S Walnut St
8. Community and Senior Center	312 S Walnut St
9. Old City Hall	108 S Oak St
10. City Hall	500 S Oak St
11. Roanoke Visitor Center and Museum*	114 N Oak St
12. Recreation Center	501 Roanoke Rd

\*The Roanoke Visitor Center and Museum is on the national registry of historic places.

All buildings with public access and associated parking lots should be evaluated for compliance with the applicable ADA Standards. All on-site sidewalk and all associated curb ramps, ramps, stairs, and other paths of travel required to be ADA compliant should also be evaluated. A map of the buildings is included in **Appendix D**.

### 3.4.2 PARKS AND PAVED TRAILS

The City of Roanoke maintains approximately 1.5 miles of paved trails. **Table 2** is a list of all City of Roanoke owned and maintained trails. **Table 3** is a list of all City of Roanoke-owned parks.

TABLE 2. SUMMARY OF TRAILS

Trail Name
1. Soccer Field Trail
2. Fairplay Park Trail
3. Community Park Trail
4. Cannon Park Trail
5. Fairway Ranch Trail
6. Howe Road Linear Park Trail
7. Parks of Roanoke Trail
8. Briarwyck Trail

TABLE 3. SUMMARY OF PARKS

Park Name	Park Address
1. Briarwyck Park	1375 Marshall Creek Rd
2. Cannon Parkway Park	750 Cannon Pkwy
3. Roanoke Community Park	201 Park Dr
4. Country Acres Park	365 Sheri Ln
5. Fair Play Park	312 S. Walnut St
6. Fairway Ranch Park	1025 Broadmoor Way
7. Fitness Court	505 Roanoke Rd
8. Linear Park	Howe Rd
9. Parks of Roanoke	107 Hillsborough Drive
10. Roanoke Skate Park	750 Cannon Parkway

All existing parks and associated parking lots should be evaluated for compliance with the applicable ADA Standards. All on-site amenities, sidewalk, and all associated curb ramps, ramps, stairs, and other paths of travel required to be ADA compliant should also be evaluated. A map of the trails and parks is included in **Appendix D**.

### 3.4.3 SIDEWALK CORRIDORS

The City developed a GIS-based inventory of City-owned sidewalk corridors. Based on the inventory, the City of Roanoke owns approximately 56 miles of sidewalk, including pedestrian street and driveway crossings. There are approximately 209 unsignalized intersections along the City-owned sidewalk corridors. There are also an estimated 111 driveways along the City-maintained sidewalk corridors.

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 walks 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.

Accordingly, all City pedestrian facilities within the public rights-of-way should be evaluated for compliance with PROWAG, including sidewalk, curb ramps, pedestrian street crossings, and pedestrian driveway crossings. At intersections where existing sidewalk does not cross the curb and curb ramps are not installed, no evaluations are needed. Locations where curb ramps are missing, but are required, will also be identified and included in the Transition Plan. A map of the sidewalk corridors is included in **Appendix D**.

### 3.4.4 PARKING INVENTORY SUMMARY

The City of Roanoke maintains multiple stand-alone parking lots, and the number of accessible parking spaces is summarized in the following table. All City-maintained accessible parking should be evaluated for compliance using the 2010 ADA standards.

TABLE 4. SUMMARY OF STAND-ALONE PARKING LOTS

Parking Lot Location	Number of Existing Accessible Parking Spaces
Main St between Oak St and Pine St	2
Lamar St and S Oak St	5
Denton Hwy between Main St and Bowie St	0
Rusk St and Pine St	4

The City of Roanoke also maintains approximately 392 on-street parking spaces along and adjacent to the S Oak St. corridor. Any provided ADA on-street parking spaces should be evaluated for compliance with PROWAG. A map of the stand-alone parking lots is included in **Appendix D**.

### 3.4.5 FACILITY INVENTORY SUMMARY

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

- ▶ 12 buildings;
- ▶ 10 parks and 1.5 miles of paved trails;
- ▶ 56 miles of sidewalk corridors, including 209 unsignalized intersections and 111 driveways; and
- ▶ 4 stand-alone parking lots with 11 existing accessible parking spaces;
- ▶ 392 on-street parking spaces



### 3.5 SCHEDULE AND IMPLEMENTATION METHODS

It is acceptable for the City to phase the Self-Evaluation over several fiscal years; however, the DOJ and FHWA will not consider the initiative to be complete until all evaluations have been completed. The City should determine and document in the Transition Plan the anticipated number of years required to complete the Self-Evaluation of City programs, services, activities, and facilities identified in **Section 3.2 Programmatic Inventory** and **Section 3.4 Existing Facility Inventory**.

After the Self-Evaluation is complete, possible solutions have been identified, and conceptual budget estimates have been determined for each improvement, an implementation plan can be developed. Depending on the estimated cost of improvements, a typical implementation plan for an entity the size of the City of Roanoke can range from 15 to 20 years. The implementation plan needs to show both a strong commitment toward upgrading ADA elements identified in the inventory of barriers in the short-term (planned capital improvement projects) and a strong commitment over time toward prioritizing curb ramps at walkways serving entities covered by the ADA. The implementation plan should also include prioritization information, planning, and investments directed at eliminating other identified barriers over time.



### 3.6 PRIORITIZATION

To aid in the development of the implementation plan, prioritization information should be provided for each facility with identified compliance issues. **Table 5**, **Table 6**, and **Table 7** provide proposed prioritization criteria for buildings, intersections (both signalized and unsignalized) and sidewalk corridors. All compliance elements included in the prioritization schedule are based on requirements from the ADA Standards and PROWAG. While every effort will be made to design and implement improvements to be consistent with the ADA Standards and PROWAG, the City will provide access to the maximum extent feasible where full compliance is technically infeasible. The priorities will be assigned based on DOJ priorities for facility access, previous project experience, and case law with respect to the severity of non-compliance. FHWA and DOJ have not provided any guidance on how to prioritize issues, only that prioritization information should be included as part of the schedule; however, best practices suggest that the prioritization methodology and resulting thresholds be first based on the severity of non-compliance and then second based on the barrier's proximity to pedestrian attractors (e.g., adjacent to a hospital or governmental facility with high daily pedestrian traffic). Since raw data is recommended to be collected during the Self-Evaluation, all data needed for prioritization should already be contained in the database with the exception of known complaints and proximity to pedestrian attractors. To streamline the prioritization of each facility, the proximity to pedestrian attractors should be collected when the elements contained within the applicable ADA Standards and PROWAG are evaluated.

Sidewalk corridors include the entire pedestrian path of travel, including sidewalk, pedestrian street crossings, pedestrian driveway crossings, and associated curb ramps. When prioritizing a sidewalk corridor, priorities for the entire pedestrian path of travel should be reported together. However, for project design and costing purposes, the possible solutions for pedestrian street crossings are more appropriately reported with the rest of the intersection improvements.

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

To determine the priority for each facility, the raw data should be compared to the criteria in **Table 5**, **Table 6** and **Table 7**. To do this, start at Priority 1 and determine if any of the criteria apply. If yes, assign the facility a priority of 1. If no, move to Priority 2 and determine if any of the criteria apply. This process should be repeated until a priority has been assigned to all intersections and each sidewalk corridor segment.

TABLE 5. PRIORITIZATION FACTORS FOR BUILDINGS

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

**TABLE 6. PRIORITIZATION FACTORS FOR SIGNALIZED AND UNSIGNALIZED INTERSECTIONS**

Priority	Criteria
<b>1 (high)</b>	Complaint filed on curb ramp or intersection
<b>2 (high)</b>	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> <li>▶ Running slope &gt; 12%</li> <li>▶ Cross slope &gt; 7%</li> <li>▶ Obstruction to or in the curb ramp or landing</li> <li>▶ Level change &gt; ¼ inch at the curb ramp connection to the street/driveway</li> <li>▶ No detectable warning surface</li> </ul> AND within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
<b>3 (high)</b>	▶ No curb ramp where sidewalk or pedestrian circulation path exists AND within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
<b>4 (high)</b>	No curb ramps, but marked crosswalk exists
<b>5 (medium)</b>	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> <li>▶ Running slope &gt; 12%</li> <li>▶ Cross slope &gt; 7%</li> <li>▶ Obstruction to or in the curb ramp or landing</li> <li>▶ Level change &gt; ¼ inch at the curb ramp connection to the street/driveway</li> <li>▶ No detectable warnings</li> </ul> AND NOT within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
<b>6 (medium)</b>	▶ No curb ramp where sidewalk or pedestrian circulation path exists AND NOT within a couple of blocks of a hospital, retirement facility, medical facility, parking garage, major employer, disability service provider, event facility, bus/transit stop, school, government facility, public facility, park, library, or church, based on field observations.
<b>7 (medium)</b>	Existing curb ramp at the apex of the corner (serving both crossing directions on the corner) is non-compliant and should be replaced with two curb ramps, one serving each crossing direction on the corner.
<b>8 (medium)</b>	Existing curb ramp with any of the following conditions: <ul style="list-style-type: none"> <li>▶ Cross slope &gt; 5%</li> <li>▶ Width &lt; 36 inches</li> <li>▶ Median/island crossings that are inaccessible</li> </ul>
<b>9 (low)</b>	Existing curb ramp with either running slope between 8.3% and 11.9% or insufficient landing
<b>10 (low)</b>	Existing perpendicular curb ramp without a 48-inch min. by 48-inch min. clear area
<b>11 (low)</b>	Existing pedestrian push button is not accessible from the sidewalk and/or curb ramp
<b>12 (low)</b>	Existing curb ramp with returned curbs where pedestrian travel across the curb is not protected
<b>13 (low)</b>	All other intersections not prioritized above



TABLE 7. PRIORITIZATION FACTORS FOR SIDEWALK CORRIDORS

Criteria	Priority 1 (High)	Priority 2 (Medium)	Priority 3 (Low)
Cross slope of sidewalk is greater than 2.1%	Value > 3.5%	3.5% ≥ Value > 2.1%	
Width of sidewalk is less than 48 inches	Value ≤ 36.0"	36.0" < Value < 42.0"	42.0" < Value < 48.0"
Obstruction present along sidewalk	Obstruction Permanent -	Obstruction Temporary -	
Heaving, sinking, or cracking present on sidewalk	Heaving Sinking Cracking		
Ponding on sidewalk		Ponding	
Missing sidewalk			Missing Sidewalk
Signalized cross street cross slope is greater than 5%	Value > 9.0%	9.0% ≥ Value ≥ 7.0%	7.0% > Value > 5.0%
Unsignalized cross street cross slope is greater than 2.1%	Value > 6.0%	6.0% ≥ Value ≥ 4.0%	4.0% > Value > 2.1%
Cross street running slope is greater than 5%	Value > 7.0%	7.0% ≥ Value ≥ 6.0%	6.0% > Value > 5.0%
Driveway sidewalk width is less than 48 inches	Value ≤ 36.0"	36.0" < Value < 42.0"	42.0" < Value < 48.0"
Driveway (or sidewalk if applicable) cross slope is greater than 2.1%	Value > 6.0%	6.0% ≥ Value ≥ 4.0%	4.0% > Value > 2.1%
Driveway (or sidewalk if applicable) condition is poor or safety concern	Elevation change greater than 1/2 inch or gaps greater than 1 inch	Elevation change between 1/4 inch and 1/2 inch or gaps between 1/2 inch and 1 inch	



### 3.7 CITY-OWNED FACILITY REVIEW

From 2023 to 2025 the City of Roanoke performed a Self-Evaluation on the following facilities:

- ▶ Six (6) parks
- ▶ All trails listed in **Table 2**
- ▶ Two (2) miles of sidewalk corridors and associated curb ramps and pedestrian street crossings

The following sections summarize the observations.

#### 3.7.1 PARKS AND TRAILS: SELF-EVALUATION OBSERVATIONS

In 2023 and 2024, The City of Roanoke evaluated 6 parks based on the 2012 Texas Accessibility Standards (TAS). **Table 8** summarizes the locations of the evaluations.

**TABLE 8. SUMMARY OF EVALUATED PARKS**

Park	Park Address
1. Cannon Parkway Park	750 Cannon Pkwy
2. Corner Park	Intersection of Foreston Dr and Collington Dr
3. Fair Play Park	312 S. Walnut St
4. Fairway Ranch Parkway	1025 Broadmoor Way
5. Roanoke Community Park	201 Park Dr
6. Roanoke Soccer Complex	505 Roanoke Rd

Many of the findings for the assessed parks relate to the parking spaces and accessible routes. The full accessibility reports can be found in **Appendix E**.

In 2024, the City of Roanoke also utilized a sidewalk inspection and repair specialist to identify and remediate tripping hazards along all City-owned trails. **Table 9** summarizes the location of the evaluations as well as the number of tripping hazards that were remediated.

TABLE 9. SUMMARY OF EVALUATED TRAILS

Park	Count of Tripping Hazards Remediated
1. Briarwyck Trail	127
2. Cannon Park Trail	81
3. Cannon Trail	19
4. Community Park Trail	64
5. Fairplay Park Trail	99
6. Fairway Ranch Trail	36
7. Fairway Ranch Trail Addon	60
8. Howe Road Linear Park Trail	28
9. Roanoke Linear Park Trail	26
10. Soccer Fields Trail	60

The full report, which details exact locations of the tripping hazards, can be found in **Appendix E**.

### 3.7.2 SIDEWALK CORRIDORS: SELF-EVALUATION OBSERVATIONS

The City of Roanoke has evaluated approximately two (2) miles of sidewalk along the N Oak Street corridor. The Oak St. corridor was selected due to the high level of pedestrian activity as well as the proximity to pedestrian traffic generators such as City Hall and the various attractions in the historic downtown district.

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.

Common observations along the sidewalk corridors included surface elevation changes greater than ¼ inch, which create tripping hazards, and overhead obstructions caused by overhanging vegetation.

Common curb ramp observations at unsignalized intersections and driveways along the sidewalk corridors included, excessive ramp and landing running and cross slopes, particularly for the blended transitions. A summary of the unsignalized intersection and driveway curb ramp observations is provided in **Table 10**.

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 walks 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.

### 3.7.3 SIDEWALK CORRIDORS: POSSIBLE SOLUTIONS

A crosswalk is defined by PROWAG 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, and the pedestrian circulation path shall be either (a) separated from the roadway with landscaping or other non-prepared surface or (b) separated from the roadway by a detectable vertical edge treatment with a bottom edge 15 inches maximum above the pedestrian circulation path (PROWAG Section R203.6.1.1).

#### *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, and the pedestrian circulation path shall be either (a) separated from the roadway with landscaping or other non-prepared surface or (b) separated from the roadway by a detectable vertical edge treatment with a bottom edge 15 inches maximum above the pedestrian circulation path (PROWAG Section R203.6.1.2).

#### *Crosswalk Markings*

For all existing, unmarked crosswalks at unsignalized intersections, the installation of crosswalk markings has been included in the unsignalized intersection reports for budgeting purposes. However, the 11<sup>th</sup> Edition of the MUTCD guidance states that on approaches controlled by STOP or YIELD signs, crosswalk markings should be installed where engineering judgement 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 provided in **Appendix E**.

**TABLE 10. SUMMARY OF CURB RAMP OBSERVATIONS AT UNSIGNALIZED INTERSECTIONS**

<b>Curb Ramp Element</b>	<b>Number Evaluated</b>	<b>Number Compliant</b>	<b>Percent Compliant</b>
Curb ramp contained wholly within the width of crosswalk served	76	76	100%
Curb ramp sides are flared or non-traversable where pedestrian circulation path crosses side of curb ramp	76	76	100%
Curb ramp sides with returned curbs are constructed at 90°	74	74	100%
Perpendicular curb ramp 48" x 48" clear area exists	32	32	100%
Detectable warning surface is compliant	76	76	100%
Surfaces: No ponding in curb ramp, landing, or flares	76	76	100%
Curb ramp flare slope parallel to curb line ≤ 10.0%	2	2	100%
Change of grade between curb ramp and gutter/street ≤ 13.3%	76	76	100%
Curb ramp width ≥ 48"	76	76	100%
Detectable warning surface exists	76	76	100%
Surfaces: No obstruction in curb ramp, landing, or flares	76	75	98.6%
Curb ramp present where curb ramp is required	78	76	97.4%
Curb ramp landing exists	76	74	97.3%
Surfaces: Flush transition to roadway exists	76	73	96.1%
Curb ramp landing cross slope ≤ 2.1%	74	71	95.9%
Curb ramp landing running slope ≤ 2.1%	74	70	94.5%
Curb ramp cross slope ≤ 2.1%	76	71	93.4%
Curb ramp running slope ≤ 8.3%, or ≤ 5.0% for blended transitions	76	43	56.6%



### 3.8 ACTION LOG

As the evaluations are completed, the City will institute an ADA Action Log to confirm follow-up on corrective actions required under the Transition Plan and documenting City efforts at compliance with the ADA. At a minimum, the Action Log will identify items that are not ADA compliant and will include anticipated completion dates. The ADA Action Log will be updated on an annual basis and should be available to the public upon request. A copy of the ADA Action Log is included in **Appendix G**.



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## 4.0 FACILITY CONCEPTUAL BUDGET ESTIMATES



### 4.1 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 public rights-of-way facilities were based on recent bid tabulations from the Texas Department of Transportation (TxDOT) construction projects, along with Consultant Team experience with similar types of projects.

The estimates for the park evaluations were based on the 2023 market prices and construction trends for the Dallas-Fort Worth Market, and typical material and installation costs for park construction sites.

“Conceptual Budget Estimates” are inclusive of individual accessibility improvements only and refers to the estimated cost of labor and materials for a specific ADA compliance modification, excluding any additional costs for overhead or project contingencies. It represents the direct expenses associated with performing the modification itself. Cost of other components will be determined by the project manager or project architect. Items include, but are not limited to, project administration, construction mobilization, material testing, design analysis, design, plan review, or contractor costs for the overall project.

**Table 11** provides a summary of the conceptual budget estimates to bring each facility into compliance.

**TABLE 11. SUMMARY OF CONCEPTUAL BUDGET ESTIMATES**

City-Owned Facility Type	Total*
Public Rights-of-Way Sidewalk	\$ 173,000
Unsignalized Intersections	\$ 162,000
Parks	\$ 243,000
Trails	\$ 46,500
<b>Total</b>	<b>\$624,500</b>

\*Table values are rounded for simplification

It is important to note the facility conceptual budget estimates in **Table 11** only include the costs to remediate non-compliance accessibility as determined by a visual inspection of the facilities. Additional budget considerations should be given to the following:

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

Obtaining a design professional to 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 which are out of compliance in a particular area of a facility is recommended.



## 4.2 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 level, and local levels. The following sections detail some different funding source options.

### 4.2.1 FEDERAL AND STATE FUNDING

There is federal and state funding available for the City to apply for through numerous agencies for various improvements. A copy of this information is also available on the FHWA website:

[https://www.fhwa.dot.gov/environment/bicycle\\_pedestrian/funding/](https://www.fhwa.dot.gov/environment/bicycle_pedestrian/funding/)

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

### 4.2.2 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) to be used for a specified improvement. The funds raised from a TAD are placed in a tax-free bond (finance) where the money can continue to grow. These improvements are typically for revitalization and especially to complete redevelopment efforts.
- ▶ Tax Increment Financing District (TIF) – A TIF allows cities to create special districts and to make public improvements within those districts that will generate private-sector development. During the development period, the tax base is frozen at the predevelopment level. Property taxes continue to be paid, but taxes derived from



increases in assessed values (the tax increment) resulting from new development either go into a special fund created to retire bonds issued to originate the development, or leverage future growth in the district.

- ▶ Transportation Reinvestment Zone
- ▶ Transportation User Fee / Street Maintenance Fee

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## 5.0 CONCLUSION AND NEXT STEPS

This document serves as the ADA Compliance Plan for the City of Roanoke. The City intends to complete the Self-Evaluation of services, policies, practices, programs, activities, and facilities identified in this document over the next several years, with a budget to be determined on an annual basis.

The next steps for the City of Roanoke are:

1. Develop an Action Plan for completing a Self-Evaluation for all City services, policies, practices described in **Section 3.2**, and associated facilities described in **Section 3.4**.
2. Complete a Self-Evaluation for all City services, policies, practices, programs, activities, and facilities. Facility evaluations should also include the following:
  - A. Facility reports with the compliance status of each element evaluated based on the applicable ADA Standards which were applicable at the time of construction for buildings, and PROWAG for elements in the public rights-of-way;
  - B. Possible solutions to remove any barriers and bring the element into compliance;
  - C. Conceptual budget estimates of possible solutions; and.
  - D. Field work data in GIS format, compatible with the City's GIS system
3. Develop an Implementation Plan, including schedule for completing the recommended facility improvements and funding sources to be used.
4. If a phased Self-Evaluation approach is used, complete remaining Self-Evaluation phases and update the City's ADA Transition Plan after each additional phase.
5. Continue to update the City's ADA Transition Plan as projects are implemented and citizen requests/complaints are received.



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## APPENDIX

**Appendix A: Public Outreach Summary**

**Appendix B: ADA Grievance Process and Public Notice**

*Title II Grievance Procedure*

*Title II Grievance Form*

*ADA Public Notice*

**Appendix C: Programmatic Inventory**

**Appendix D: Federal Highway Administration ADA Transition Plans Memo**

**Appendix E: Facility Inventory Map**

**Appendix F: Facility Reports**

*Parks and Park Trails*

*Sidewalk Corridors*

*Unsignalized Intersections*

**Appendix G: Action Log**