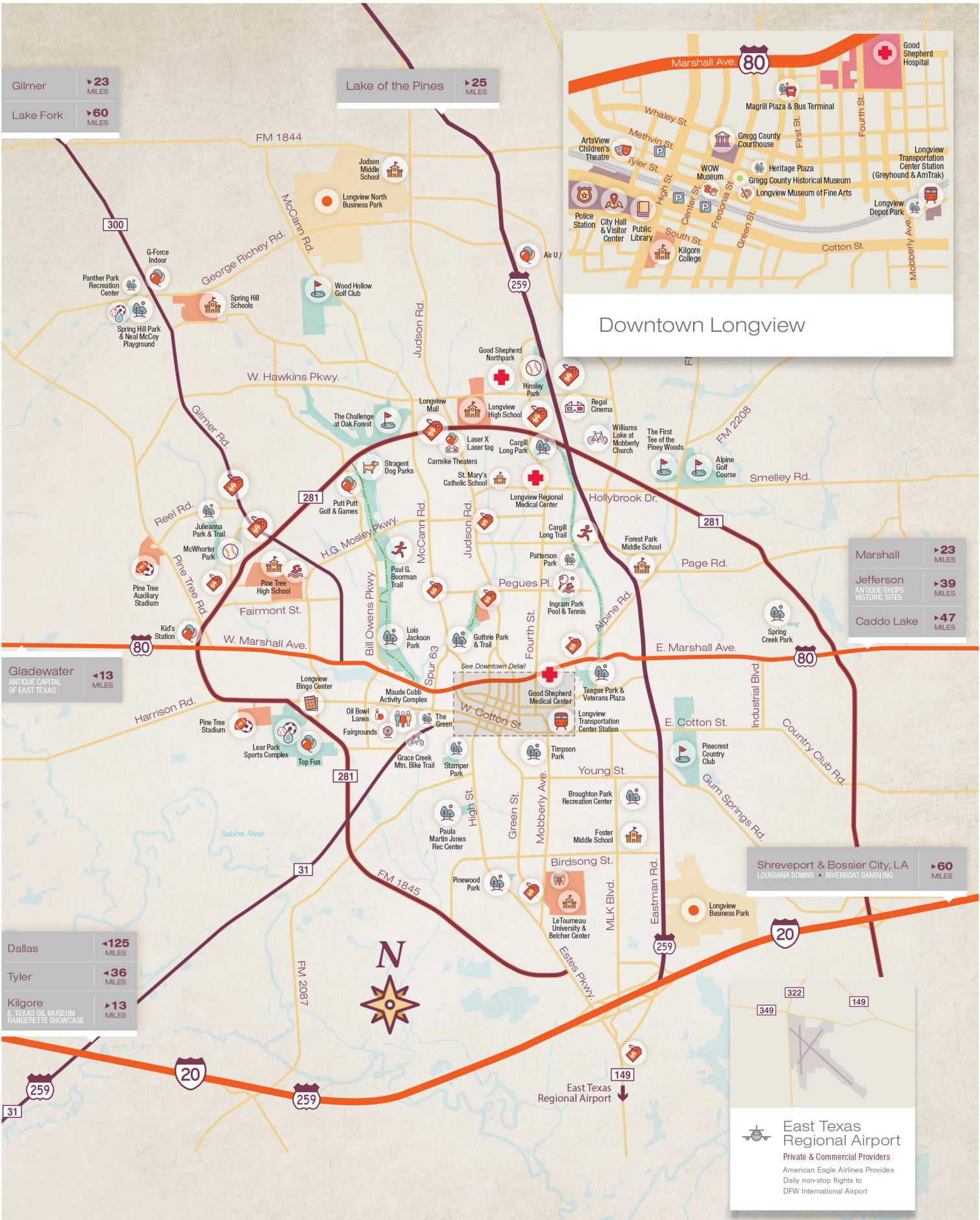


# City of Longview



# Proposed Cultural District

◀ 13  
MILES

## Downtown Area

1. ArtsView Children's Theatre
2. Central Fire Station
3. City Hall / Visitors Center
4. First Baptist Church
5. First Presbyterian Church
6. First United Methodist Church
7. Gregg County Courthouse
8. Gregg County Historical Museum
9. Heritage Plaza
10. Historic Longview Train Depot
11. Pelala Plaza and J.T. Smith Sculpture Garden
12. Kilgore College - Longview
13. Longview Chamber of Commerce
14. Longview Community Center
15. Longview Museum of Fine Arts
16. Longview Public Library
17. Longview Safety City
18. Longview World of Wonders
19. Magrill Plaza

## LeTourneau University Area

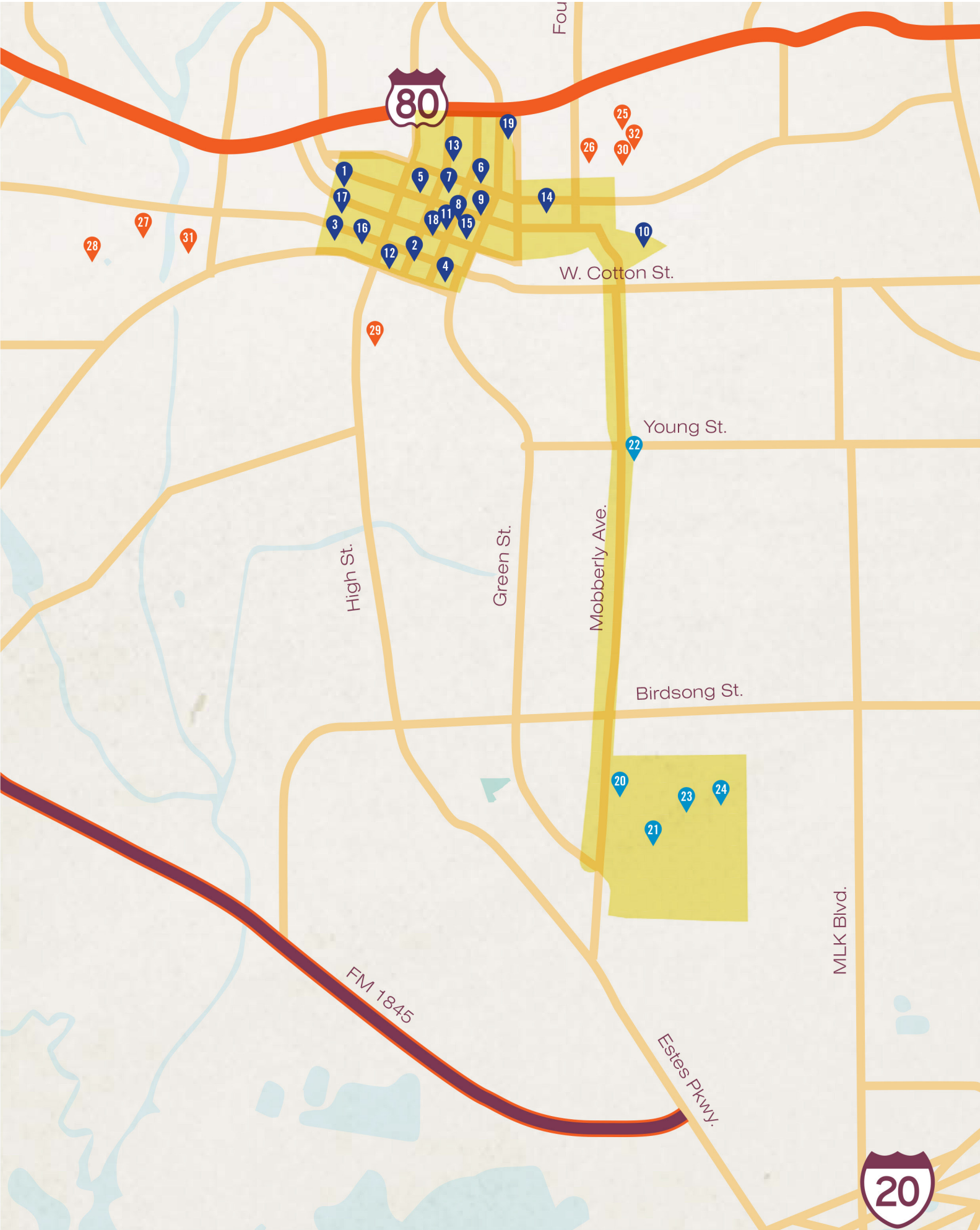
20. Belcher Center
21. Glaske Statue
22. Historic Longview Fire Station
23. R.G. LeTourneau Museum
24. Speer Chapel

## Surrounding Area

25. First Christian Church
26. Greenwood Cemetery
27. Longview Arboretum and Nature Center
28. Maude Cobb Convention and Activity Complex
29. Preservation Longview Rucker-Campbell House
30. Saint Anthony's Catholic Church
31. The Green
32. Trinity Episcopal Church

◀ 125  
MILES

◀ 36  
MILES





8/16/2017

# Longview ADA Transition Plan for the Public Right of Way

City of Longview, Texas

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## Section 1: Introduction

The main purpose of the Longview Americans with Disabilities Act (ADA) Transition Plan for the Public Right of Way is to develop policies and practices for implementing physical pedestrian improvements within the public right-of-way of the City of Longview, Texas.

The ADA requires all public agencies to develop an ADA Transition Plan to cover all facilities under their control. This includes rights-of-way, but also the buildings that may be owned by the agencies, such as government offices, city parks bathrooms, and other types of buildings. **The focus of this plan is solely on the City-managed pedestrian facilities in public rights-of-way.** This includes sidewalks, paved trails, curb ramps, street crossings, driveway crossings, crosswalks, median crossings, public transit stops, and pedestrian-activated signals systems.

### 1.1 Legislative Mandate

The Americans with Disabilities Act (ADA) provides civil rights protections to persons with disabilities in the areas of employment, state and local government services, access to public accommodations, transportation and telecommunications. Title II of the ADA (Public Services) requires that all Programs, Services, and Activities of public agencies provide equal access for individuals with disabilities.

Title II also provides for the adoption of ADA Transition Plans. Title II dictates that government entities that employ more than 50 people must:

- Designate at least one person who is responsible for overseeing Title II compliance;
- Develop an ADA complaint procedure;
- Complete a Self-evaluation; and
- Develop an ADA 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.

### 1.2 ADA Transition Plan Requirements

The ADA Transition Plan lists existing barriers in the public rights-of-way under the City's jurisdiction, and schedules for the removal of barriers to provide access for individuals with disabilities to City programs. The City is required to provide access to all programs, but is not required to remove all architectural barriers in all of its facilities. In addition to making physical improvements, government agencies can choose among various administrative solutions, such as relocating or modifying a particular program to obtain overall program access.

ADA Transition Plans are required by the Department of Justice to include the following elements:

1. An inventory of the physical barriers in the public agency's facilities that limit accessibility of individuals with disabilities (the "Self-Evaluation")
2. A description of the methods that will be used to make the facilities accessible
3. The name of the official responsible for implementation
4. If a public entity has responsibility or authority over streets, roads, or walkways, its ADA Transition Plan shall include a schedule for providing curb ramps, giving priority to walkways that will provide access to City programs

5. A schedule for taking any other steps necessary to achieve compliance with the ADA
6. A record of the opportunity given to the disability community and other interested parties to participate in the development of this plan

As this ADA Transition Plan is for the Public Right of Way, this document will not include elements 1 and 2 of the above list (the inventory of physical barriers inside facilities, or the methods that will be used to make them accessible). A separate ADA Transition Plan for Public Facilities will be prepared by the City.

### 1.3 Program Accessibility

In addition to developing an ADA Transition Plan, Title II of the ADA mandates that government entities that employ more than 50 people provide access for individuals with disabilities to all programs and activities (Code of Federal Regulations, Title 28, Subpart D). A public entity shall operate each service, program or activity, when viewed in its entirety, so that it is accessible to and useable by individuals with disabilities. The activity of using the public right-of-way may be considered a program in two different ways:

- Streets, sidewalks, and curb ramps may be part of a continuous path of travel used by individuals to access activities or programs.
- Streets, sidewalks, and curb ramps may themselves represent a program of public pedestrian activities that are essential to the use and enjoyment of a community.

A Public entity's programs related to streets, sidewalks, and curb ramps may be prioritized with respect to importance and frequency of usage. Program accessibility also would not require all streets, sidewalks and curb ramps to be fully accessible as required by current codes.

### 1.4 Reference Documents

The following codes and standards are referenced as applicable by law or statute. Should other new codes or standards become applicable law or statute after the adoption of these standards, such new codes or standards shall supersede these standards, but only to the extent that new codes or standards are more restrictive or exceed these standards.

1. [Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way \("PROWAG"\)](#), published by the Architectural and Transportation Barriers Compliance Board on June 26, 2011. These guidelines are intended to add to the 2010 ADA Standards by providing detailed guidance for pedestrian facilities in the public right-of-way. The guidelines have not been approved, but are represented to be the most current state-of-the-art with respect to accessibility in the public right-of-way and should be used by default. When approved, PROWAG will become mandatory for all public agencies.
2. [Bicycle and Pedestrian Accommodation Environmental Handbook](#), published by Texas Department of Transportation in 2014. This 8-page handbook includes "Requirement Triggers" when transportation projects in urban and rural settings are required to address pedestrian and bicycle accommodations.
3. [Roadway Design Manual, \(RDM\)](#) published by Texas Department of Transportation October 1, 2014. Specifically, *Chapter 3, New Location and Reconstruction (4R) Design Criteria*, presents guidelines that are applicable to all new location and reconstruction projects for different classes of roadways, including urban streets and suburban ways.

4. **TxDOT Pedestrian Facilities (PED) Standard Sheets**, published by Texas Department of Transportation on June 13, 2012. These four standard sheets provide detailed design guidance for a wide variety of curb ramps, provide instructions for detectable warnings, show sidewalk treatment at driveways, and typical crossing layouts.
5. The **2010 ADA Standards for Accessible Design**, (“**2010 Standards**”) published by the U.S. Department of Justice, reflect the revised regulations for Titles II and III of the ADA. The 2010 Standards include the 2004 ADA Accessibility Guidelines, an update of specific design guidelines. The focus of the 2010 Standards is on buildings, not on the public right-of-way.
6. **2012 Texas Accessibility Standards (TAS)**, published by the Texas Department of Licensing and Regulation in 2012. The standards also are primarily focused on buildings.

## Section 2. Public Outreach

The City of Longview is required to provide an opportunity for interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the development of the ADA Transition Plan by submitting comments and making specific recommendations. The ADA also requires that a copy of the draft ADA Transition Plan shall be made available for public inspection during a formal review period.

The City provided opportunities to receive input from the public concerning this Transition Plan. In the future, the City will organize at least one public workshop or hearing every year.

### 2.1 Focus Group

The city invited local disability organization representatives and members to a discussion of how the City is doing regarding accessibility in the right-of-way, and answer any questions or concerns they may have related to the ADA Transition Plan process.

### 2.2 Public Workshop

The City hosted a public workshop when the draft Transition Plan was ready for public comment. Organizations that participated in the Focus Group, as well as the general public, were invited to the public workshop. The draft Transition Plan was available on the website in advance of the public workshop and revisions were made based on comments received during the workshop.

### 2.3 Website

The City will establish a page on its website dedicated to providing information about the city’s compliance with the ADA.

The website will provide notice of the ADA Transition Plan purpose, schedule, and timeline, links to the pedestrian/ADA consumer survey, and upcoming meetings.

In addition, the website will serve as a one-stop portal for issues related to ADA compliance—including information on how to contact the City’s ADA Coordinator, the ADA Grievance Process (See Appendix A), the ADA Complaint form (See Appendix B)—and will be a place for the public to access the draft and final ADA Transition Plan.



## Section 3. Self-Evaluation of Programs, Policies, and Procedures

Although this ADA Transition Plan is limited to the Public Right of Way, there are several programmatic recommendations that will help the City carry out the necessary steps to remove barriers within the public right of way and move towards compliance with Title II. The self-evaluation of these programs, policies, and procedures is below.

### 3.1 ADA Coordinator

Title II requires public entities to designate at least one employee to be responsible for coordinating the implementation of ADA requirements and for investigating complaints of alleged noncompliance. The benefits of having an ADA Coordinator are that:

- It makes it easier for members of the public to identify someone to help them with questions and concerns about disability discrimination
- It provides a single source of information so questions by the City staff and from the outside the City can be answered quickly and consistently; and
- It provides an individual who can focus on and who can be instrumental in moving compliance plans forward.

A person who is appointed to this position should be familiar with the requirements of the ADA and have sufficient time free of other responsibilities to carry out the duties of the coordinator. The person in this position should be familiar with applicable ADA standards and procedures.

The City Engineer is designated as the City of Longview ADA Coordinator.

### Self-Evaluation Findings

As a newly established position, the ADA Coordinator would benefit from additional training in the requirements, standards, and procedures of the ADA. In addition, other City departments are unlikely aware of this new position and appointment.

### Recommended Actions

Training on PROWAG and the inspection process for curb ramps under construction should be provided to the ADA Coordinator.

Internal training on the role of the ADA Coordinator and the inspection process should be provided to relevant personnel in the Public Works, Planning, and Parks and Recreation Departments.

### 3.2 Grievance Procedure and Grievance Form Process

Local governments with 50 or more employees are required to adopt and publish grievance procedures for Title II complaints. A grievance form is not required by the Department of Justice, but a form can be an effective tool to aid in the collection of information needed to address a complaint. Title II does not specify what must be included in a grievance procedure, but the Department of Justice has developed a model grievance procedure that can be used as a starting point

### Self-Evaluation Findings

The City did not previously have a grievance procedure or form.

## Recommended Actions

A grievance procedure was developed based on standard recommended language set forth by the Department of Justice. It is contained in Appendix A.

A grievance form was created in order to efficiently capture information about the grievance, and facilitate the required 3 years of retention of ADA complaints that are required by the Department of Justice. The grievance form is shown in Appendix B. The form will be filled out by the ADA coordinator or other appropriately-trained City staff on behalf of the person making the complaint (in person, over the phone, or via mail or electronic mail). This form can also be made available in hard copy and online in the future to be filled out by the person filing the complaint.

## 3.3 City Ordinance Review

The following chapters of the City's municipal code were reviewed to ensure that City policy relating to projects in the public right of way do not discriminate against people with disabilities:

- Chapter 16. Bicycles
- Chapter 81. Public Recreational Facilities
- Chapter 91. Streets and Sidewalks
- Chapter 92. Subdivisions
- Chapter 97. Traffic

## Self-Evaluation Findings

- Chapter 91 does not require that driveway openings must comply with PROWAG standards for sidewalks.
- Chapter 91, Section 91-11 does not mention the requirement to provide an alternative accessible route when a sidewalk is being blocked due to construction.
- Chapter 92 does not include any requirements for building sidewalks in new development. This chapter will be superseded by a Unified Development Code (UDC) which is currently in draft form for the City of Longview.
- The ordinances do not include street design standards, which would set forth standards for sidewalks and curb ramps. In practice, however, the City uses TxDOT's PED Standard Sheets for curb ramp design.
- Chapter 97 does not mention that any pedestrian signals installed shall conform with PROWAG.

## Recommended Actions

- Chapter 91 should be amended to include a requirement that driveway openings must comply with PROWAG standards for sidewalks. This should include requirements that sidewalks are continuous across driveways; free of vertical curbs, lips, or any other grade change in excess of 8 percent; and maintain a cross slope less than 2 percent. Detectable warnings are not required or appropriate for driveway crossings.
- Chapter 91, Section 91-11 should be amended to include a subsection that mentions the requirement to provide an alternative accessible route when a sidewalk is being blocked due to construction.
- The UDC, which will supersede Chapter 92, should require a minimum 4-foot wide sidewalk to be built by the developer as part of all new subdivisions. Sidewalks should

be installed along both sides of all urban residential streets, arterials, and collectors, except along streets which do not have curbs and gutters. Sidewalks shall be constructed to PROWAG standards.

- Include the TxDOT PED Standard Sheets for curb ramp design in the UDC.
- Chapter 97, Section 97-75 should mention that when pedestrian signals are installed, they should be installed in conformity with PROWAG.

## Section 4: Inventory of Physical Barriers in the Public Right of Way

The City of Longview has not yet conducted an inventory of the physical barriers in the public right of way with respect to ADA compliance. A full inventory would survey both intersections (curb ramps, accessibility of pedestrian signals, and crossing treatments) and sidewalk corridors (sidewalk width, barriers, and scopes). This transition plan provides a roadmap and guidance for conducting that inventory, so that the City can work toward establishing a baseline.

Because this is the City's first transition plan, intersections and sidewalk corridors will be surveyed based on priority. The most detailed level of survey will focus on the high-and medium priority levels first.

### 4.1 Priority Levels for Inventory Field Work

#### High-Priority Intersections and Sidewalk Corridors

For the following high-priority intersections and sidewalk corridors, the field surveyors should collect a detailed set of accessibility data (as described in section 4.2):

- Major roadways (Principal Arterials), transit routes and intersections along these roadways
- Intersections and sidewalk corridors near government facilities or private services likely to serve people with disabilities including:
  - City, county, state, or federal-owned facilities and service centers;
  - Public schools (approximately one-quarter mile radius) and colleges (approximately one-half mile radius);
  - Hospitals, health clinics and medical centers (both public and private);
  - Rehabilitation centers and housing that serve seniors and people with disabilities; and
  - Police stations and sheriff's department.

#### Medium Priority Intersections and Sidewalk Corridors

After completing the inventory of high-priority intersections and sidewalk corridors, the field surveyors should collect a detailed set of accessibility data (as described in section 4.2) for medium-priority intersections and sidewalk corridors:

- Collectors (Minor arterials) and intersections along the collectors
- Intersections and sidewalk corridors near private facilities that attract many users, including:
  - Shopping malls, supermarkets, and commercial centers
  - Major employment sites; and
  - Multi-family housing developments

## Lower Priority Intersections and Sidewalk Corridors

For low-priority intersections and sidewalk corridors along local streets and residential or industrial areas, a simplified survey can be used to gather basic baseline data. The simplified surveys would consist of visual inspection of intersection elements (which may be done using online maps such as Google Streetview and Bing Streetside) to make a basic and objective determination of the overall compliance. Some areas could then be spot-checked to verify these original determinations. The following criteria can determine which intersections and sidewalk corridors in residential areas on local streets would be surveyed with the detailed measurements:

- Construction year of the adjacent land uses. For example, intersections and sidewalk corridors within a specific subdivision would probably be built with similar standards.
- Longview Paratransit's dataset of active riders, to determine areas where people with disabilities live.

## 4.2 Data Collection for High and Medium Priority Intersections and Sidewalk Corridors.

In 2016 and 2017, the City of Longview conducted an inventory of sidewalk corridors. The inventory is in a GIS shapefile that shows the locations of current sidewalks, the condition of the sidewalk, and the sidewalk width. The inventory does not include any information about barriers along the sidewalk corridors, such as obstructions, obstacles, or steep slopes (running slope or cross slopes) in the sidewalk corridors. The City of Longview has not yet conducted any inventory of curb ramps or crosswalks at intersections.

### Recommended Actions

The City should hire a registered accessibility specialist (RAS) to conduct the detailed data collection for high and medium priority areas, and could use local staff to visually inspect the lower-priority areas. By hiring a professional, the City will not need to invest in any of the special equipment, software, or extensive training required to conduct the inventory. The professional hired should provide the City with the inventory data in a database format that will be useful to the ADA Coordinator after the completion of the inventory; the inventory will need to be updated as curb ramps are constructed and barriers are removed, and should be in a format that can be accessed by the general public. For this reason, it is preferable that the inventory is available in spreadsheet format.

### Detailed Intersection Data

The following types of data will need to be collected in high and medium priority intersections. An RAS will have the training, equipment, and survey forms necessary to record this data:

- Whether curb ramp width, slope and flare slope are within acceptable parameters
- Whether the curb ramps point users in the proper crossing position
- Whether a lip is present at the bottom of the curb ramp, and the height of the lip
- Whether the truncated dome tactile warnings are present on the curb ramp, and the dimensions and color of the tactile warnings and surrounding curb ramp color
- Whether a sufficient landing is provided at the top of the curb ramp
- Presence of pedestrian signals, actuator buttons, and the type, size, height, and location of the buttons

- Presence of crosswalks and whether they are aligned with curb ramps; presence of curb ramps on pedestrian islands

### Detailed Sidewalk Corridor Data

For high-and medium priority sidewalk corridors, the City should supplement its current inventory of sidewalk corridors to include a broader evaluation of compliance with the 2010 Standards and PROWAG. The following additional data will need to be added. An RAS will have the training, equipment, and survey forms necessary to record this data:

- Presence of obstacles such as utility poles in the pedestrian path.
- Presence of steep cross slopes or running slopes that do not meet ADA guidelines.
- Changes in level or gaps greater than 1/2”
- Photos of each physical barrier recorded during the inventory.

## Section 5: Recommended Policies and Programs for Addressing Physical Barriers in the Public Right of Way

The update to the UDC (mentioned in Section 3.3) will provide guidance and standards for adding pedestrian accessibility as new developments are built. For existing roadways, there are three channels through which the City can add curb ramps and sidewalks: Roadway Projects, Public and Private Utility Work, and Annual Programs.

### 5.1 City, County, or State Roadway Projects

The City of Longview does not currently have a policy for adding sidewalks and curb ramps as part of routine reconstruction and resurfacing.

Federal and State guidance on these topics should be followed. Federal guidance lays out the minimum necessary to comply with the ADA and increase the sidewalk network in the City.

*Federal Guidance:* In 2014, the Department of Justice and FHWA released a clarification that provided a single Federal policy that identifies which specific asphalt and concrete-pavement repair treatments are considered “alterations” (requiring installation of curb ramps within the scope of the project), and those that are considered “maintenance” (which do not require curb ramps). This guidance can also help clarify when curb ramps and pedestrian accommodation are required as part of street reconstructed for utility work. The memo is available on the FWHA website: [www.fhwa.dot.gov/civilrights/programs/doj\\_fhwa\\_ta.cfm](http://www.fhwa.dot.gov/civilrights/programs/doj_fhwa_ta.cfm)

*State Guidance:* TxDOT policy on adding curb ramps and sidewalks is explained in the Bicycle and Pedestrian Accommodation Environmental Handbook. It defines triggers for urban projects and rural projects and is the basis for the recommended policy below.

### Recommended Actions:

Adopt a policy for capital improvement projects that is consistent with TxDOT policy on providing pedestrian accommodation as part of construction projects. This policy will ensure compliance with the federal guidelines:

- For reconstruction, resurfacing, and rehabilitation projects within the existing right-of-way and when the scope of work is limited to within the roadway typical section

(including adding a new layer of asphalt, microsurfacing, and cape seals)<sup>1</sup>, the project plans should:

- Remove barriers to accommodate pedestrian per the 2010 Standards, PROWAG and TxDOT’s Pedestrian Pedestrian Facilities (PED) Standard sheets.
- For construction projects within existing right-of-way, but when the scope of work involves pavement widening, the project plans should:
  - Include necessary work to ensure all existing ADA curb ramps comply with current standards; and
  - Reconstruct or add sidewalks and crosswalks to ensure a continuous ADA compliant pedestrian route.
- For full reconstruction or new construction projects, where new right-of-way is acquired, the project plans should provide the desired roadway, sidewalk buffer, and sidewalk values shown in the RDM, the 2010 Standards, and/or PROWAG for each facility type.
- On new construction projects, and where practical on reconstruction projects, that include the construction of a raised median, a 6-foot median width should be provided for pedestrian refuge in accordance with the PROWAG.

## 5.2 Public and Private Utility Work

If an intersection will be reconstructed as part of public or private utility work, the project plans may need to add curb ramps.

Using guidance from the 2014 Department of Justice and FHWA memo referenced above, if the utility work will reconstruct a street spanning from one intersection to another, or if the utility work requires reconstruction of a crosswalk, the requirement to provide curb ramps is triggered. Crosswalks constitute distinct elements of the right-of-way to facilitate pedestrian traffic.

The ADA does not require installation of curb ramps if there are not existing sidewalks for pedestrian use.

## 5.3 Annual Programs

As part of the requirements of the ADA Transition Plan, the City must show that it is taking proactive steps to remove barriers from the public right-of-way. That means the creation of annual funding programs to build accessible curb ramps, remove barriers along sidewalk corridors, and fill in gaps in the sidewalk network according to a prioritized list.

### Recommended Actions:

#### 5.3.1 Annual Curb Ramp Replacement and Barrier Removal Program

The City should allocate annual funding for curb ramp replacements and barrier removals, to be implemented in a schedule based on the following use and condition priorities. Funding requirements will be described in greater detail in Section 6.

Use Priority	Criteria
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<sup>1</sup> Projects solely involving crack sealing, pothole filling, or small scale repairs at areas not at crosswalks do not trigger the need to replace curb ramps.

A	<p><b>Public Input Requests to ADA Coordinator</b></p> <p>When an ADA Complaint is received by the ADA Coordinator requesting a curb ramp or barrier removal, these requests will have the highest priority for curb ramp installation/replacement and barrier removal.</p>
B	<p><b>Major Roads, Government Facilities, and Centers Likely to be used by people with disabilities.</b></p> <p>The following high-priority intersections and corridors will have second-highest priority for curb ramp installation/replacement and barrier removal:</p> <ul style="list-style-type: none"> <li>• Major roadways (Principal Arterials), transit routes, and intersections along these roadways;</li> <li>• Intersections and sidewalk corridors near government facilities or private services likely to serve people with disabilities including: <ul style="list-style-type: none"> <li>○ City, county, state, or federal-owned facilities and service centers;</li> <li>○ Public schools (approximately one-quarter mile radius) and colleges (approximately one-half mile radius);</li> <li>○ Hospitals, health clinics and medical centers (both public and private);</li> <li>○ Rehabilitation centers and housing that serve seniors and people with disabilities; and</li> <li>○ Police stations and sheriff’s department.</li> </ul> </li> </ul>
C	<p><b>Medium-Priority Roads and Important Land Uses</b></p> <p>The following medium-priority intersections and corridors will have third-highest priority for curb ramp installation/replacement and barrier removal:</p> <ul style="list-style-type: none"> <li>• Collectors (Minor arterials) and intersections along the collectors</li> <li>• Intersections and sidewalk corridors near private facilities that attract many users, including: <ul style="list-style-type: none"> <li>○ Shopping malls, supermarkets, and commercial centers</li> <li>○ Major employment sites; and</li> <li>○ Multi-family housing developments</li> </ul> </li> </ul>
D	<p><b>Low-Density Residential</b></p> <p>The following low-priority intersections and corridors have the lowest-priority for curb ramp installation/replacement and barrier removal:</p> <ul style="list-style-type: none"> <li>• Local streets and intersections along local streets</li> <li>• Intersections and sidewalk corridors in residential, industrial, or other areas not identified in Condition Priorities B or C.</li> </ul>

Within each of the Priority categories above, there may be many curb ramps and barriers that need to be addressed. The City should use the existing condition of the curb or sidewalk when

determining the priority within each category. The “Condition” criteria (outlined below) help determine the priority within the category:

Condition Priority	Criteria
1	<p><b>Condition Could Cause a Trip or Fall</b></p> <ul style="list-style-type: none"> <li>• The highest priority is to reconstruct curb ramps, or uneven surfaces along a sidewalk that could cause someone to trip or tip over in a wheelchair.</li> </ul>
2	<p><b>Major barrier</b></p> <ul style="list-style-type: none"> <li>• No existing curb ramps in either corner of the crosswalk.</li> <li>• Sidewalk segments with a barrier in the pedestrian path.</li> </ul>
3	<p><b>Intermediate barrier</b></p> <ul style="list-style-type: none"> <li>• When a corner has one existing curb ramp and conditions allow for the construction of an additional curb ramp, and traffic controls allow for a safe path of travel.</li> <li>• When curb ramps provide some difficult physical condition that would create a hardship on the person entering or leaving the roadway, or traveling along a sidewalk segment.</li> </ul>
4	<p><b>Not a barrier, but does not meet current standards</b></p> <ul style="list-style-type: none"> <li>• Some curb ramps don’t meet current Federal PROWAG standards, but do not constitute significant barriers or hazards. These should be lowest in priority for replacement.</li> </ul>

### 5.3.2 Implement a Sidewalk Maintenance and Addition Program

As mentioned in Section 3.3, the City’s new UDC should establish the process for allowing developers to pay into a special fund in lieu of sidewalk construction. By allowing developers to pay into a sidewalk fund, the City can use the fund to maintain existing sidewalks or add new sidewalks in high-priority areas, using the criteria outlined above for the Annual Curb Ramp Replacement and Barrier Removal program.

### 5.3.3 Apply for Federal or State Funding.

The City can use many of the TxDOT and FHWA funding sources that it can already use for road construction projects for the purpose of providing accessible curb ramps and removing barriers. However, the City should consider additional state and federal funding sources. A review of the FY 2017-2020 Transportation Improvement Program (TIP) showed that Longview does not currently have any projects planned using the following funding pools. These programs are highlighted because they are currently active and may be used for pedestrian improvements in upcoming years:



- **Transportation Alternatives Set-Aside (TA-Set Aside).** Project activities are limited to construction of pedestrian and bicycle infrastructure related projects in population areas less than 200,000. Funds from the Transportation Alternatives Program, which the TA-Set Aside program replaced, have successfully been used in small Texas cities to pay for ADA-complaint sidewalks near schools as part of efforts to make it safer for children to walk or bike to school, and encourage them to do so.
- **Recreational Trails Grants.** The Texas Parks and Wildlife Department distributes these funds for projects that are primarily for recreational use. The funds can be used to repair existing paths and/or upgrade them to meet ADA standards.
- **Highway Safety Improvement Program (HSIP).** Projects need to align with Texas' Strategic Highway Safety Plan goals, which include improving pedestrian signals, signs, and crosswalk markings; and increasing the number of sidewalks and walkways in rural and urban areas. Projects can include intersection improvements, traffic calming, and improvements that increase the safety of pedestrians and people with disabilities.

## Section 6 Costs and Implementation Schedule

### 6.1 Costs projection summaries

In order to develop a reasonable implementation schedule, typical cost estimates were collected for curb ramps and sidewalks. The table below provides a summary of the estimated costs for each project type.

#### Estimated Cost of ADA improvement projects, by facility type

Facility type	High	Medium	Low
Curb ramp (each)	\$2,000	\$1,500	\$1,400
Sidewalk (square yard)	\$80 (remove and replace)	\$60	\$40
Sidewalk (linear foot, 4 feet wide, not including curb ramps)	\$36	\$27	\$18
Barrier Removal	A typical cost for barrier removal cannot be accurately estimated because costs vary substantially depending on the type, size, and location of barrier to be removed.		

### 6.2 Implementation Schedule

The table below details the costs and proposed implementation schedule for the annual program described in Section 5.3. This schedule and associated budgets reflect the cost of stand-alone retrofit projects and are not inclusive of the costs of providing curb ramps and sidewalks as part of street construction projects.

This plan serves as the implementation schedule for the Transition Plan. The City of Longview reserves the right to change the barrier removal priorities on an ongoing basis in order to allow flexibility in accommodating community requests, petitions for reasonable modifications from persons with disabilities, and changes in City programs.

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

### Costs of Implementing

Facility type	Estimated total cost	Number of years	Approximate Annual Budget
Curb Ramps	\$375,000	15	\$25,000
Sidewalk Corridors	\$2,925,000	15	\$195,000
Barrier Removal	\$225,000	15	\$15,000

## Section 7: Reporting and Reviewing Progress

This section details the methods and procedures for monitoring construction activities and for tracking the status of compliance with the ADA Transition Plan for the public right-of-way at all construction locations within the City.

### 7.1 Field Inspections and Monitoring

As new curb ramps, crosswalks, and sidewalks are built as part of the policies and programs listed in Section 5, the City will ensure they are being built to PROWAG standards by hiring a RAS to perform these field inspections. The City may alternatively require consultants and contractors to hire a RAS to perform inspections. The City will be responsible for following up with the contractors where corrections need to be made; otherwise the City should archive the RAS reports for a minimum of three years.

### 7.2 Tracking and Status Reporting

Once the RAS has submitted the field inspections forms, the spreadsheet inventory of sidewalks corridors, barriers, and curb ramps described in Section 4.2 will be updated. The data entry for this task can be performed either by the field inspectors themselves or by City staff. The computerized database will be made available to the general public online or by request.

## Appendix A: Grievance Procedure Under the Americans with Disabilities Act



This grievance procedure is established to meet the requirements of the Americans with Disabilities Act of 1990 ("ADA"). It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the City of Longview.

Employment-related complaints should be filed with the Longview Human Resources department where city policy and applicable laws will guide the investigative procedure and resolution process.

### Grievance Procedure:

- 1) The complainant (and/or his or her representative) should fill out the ADA Complaint Form (available from the City of Longview ADA Coordinator/City Engineer) and submit it as soon as possible, but no later than 60 calendar days after the incident took place. The form should be submitted to:

ADA Coordinator  
Longview Public Works Department  
933 Mobile Dr.  
Longview, TX 75604

- 2) Within 15 calendar days after receipt of the complaint, the ADA Coordinator or a designee will meet with the complainant to discuss the complaint and the possible resolutions.
- 3) Within 30 calendar days after receipt of the complaint, the ADA Coordinator or a designee will respond in writing, and where appropriate, in a format accessible to the complainant, such as large print, Braille, or audio tape. The response will explain the position of the City of Longview and offer options for substantive resolution of the complaint.

### Grievance Appeal Process:

- 4) If the response by the ADA Coordinator or a designee does not satisfactorily resolve the issue, the complainant and/or his or her representative designee may appeal the decision within 15 calendar days of receiving the response. The decision should be appealed to the City Manager or a designee.
- 5) Within 15 calendar days after receipt of the appeal, the City Manager or a designee will meet with the complainant to discuss the complaint and possible resolutions.
- 6) Within 15 calendar days after this meeting, the City Manager or a designee will respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

### Grievance Retention:

All written complaints received by the ADA Coordinator or a designee, appeals to the City Manager or designee, and responses from these two offices will be retained by the City of Longview for at least three years.

### Federal Grievance

Individuals who believe they have been discriminated against in employment by a local government in violation of the ADA may pursue other remedies, such as by filing a complaint with the responsible federal department or agency. Use of this grievance procedure is not a prerequisite to the pursuit of other remedies.

**Appendix B:**  
**Complaint Form**  
**Under the Americans with Disabilities Act (ADA)**



Please complete and sign this form and submit it within 60 calendar days of any incident to:

**ADA Coordinator**  
 Longview Public Works Department  
 933 Mobile Dr.  
 Longview, TX 75604  
 Email: [abradley@longviewtexas.gov](mailto:abradley@longviewtexas.gov)

**I wish to file a complaint about:**

<input type="checkbox"/> Facility Accessibility	<input type="checkbox"/> City Programs, Services & Activities
<input type="checkbox"/> Other:	

**Person filling out this form**

Full Name:	
Address:	
City, State, Zip Code:	
Phone:	Alternate Phone:

**Person discriminated against (if other than the person filling out form)**

Full Name:	
Address:	
City, State, Zip Code:	
Phone:	Alternate Phone:

**For Internal Use Only**

Date Complaint Received:	Received by:
--------------------------	--------------

## Details of complaint/incident

Date and time the incident took place:
Department or agency which you believe has discriminated:
Address of agency:
City, State, Zip Code:
Phone:
Describe the complaint/incident with enough detail so that the nature of the grievance can be understood. Add additional pages if necessary.

## Resolution

What remedy are you seeking?
Have you tried to resolve the complaint through a city department? <input type="checkbox"/> Yes <input type="checkbox"/> No If “yes”, please describe the efforts that have been made. Add additional pages if necessary.
Have you filed—or do you intend to file—this complaint with any other federal, state or local agency; or with any federal or state court? <input type="checkbox"/> Has been filed <input type="checkbox"/> Will be filed <input type="checkbox"/> Has not been filed Agency or Court:

## Signature

Name:	Date:
-------	-------

You may attach any written material, photographs or other documentation that you feel is relevant to the complaint. If you need assistance, require an accessible format, or have questions about this form, please contact the City of Longview ADA Coordinator at [abradley@longviewtexas.gov](mailto:abradley@longviewtexas.gov) or (903) 237-1067.

## Appendix C: Curb Ramp Design Details

The following pages include TxDOT curb ramp standard designs, which should be included and incorporated into the Longview UDC.

The PED Standard Sheets also should be referenced as part of the ADA transition plan work. These four standard sheets provide detailed design guidance for a wide variety of curb ramps, provide instructions for detectible warnings, show sidewalk treatment at driveways, and typical crossing layouts.

The PED Standard Sheets are available online as PDFs here:

<ftp://ftp.dot.state.tx.us/pub/txdot-info/cmd/cserve/standard/roadway/ped12a.pdf>

# City of Longview

## Complete Streets

### Before & After Photos

**Economic Benefit:** Complete Streets affect the local economy in various ways. By providing convenient alternatives to driving, such as transit, walking, or biking, residents and visitors save money on transportation costs which can then be used in other ways, such as housing, restaurants, and entertainment. Congestion costs can also be reduced if residents use alternative modes. Local businesses see the benefits in improving access to people traveling by foot or bicycle. By increasing pedestrian and bicycle activity, businesses often see increased sales. Bicycle infrastructure can often create jobs directly through increased tourism, bicycle manufacturing, sales and repair, bike tours, and other activities. Complete Streets also spur private investment by improving the public space and making it more pedestrian-and cyclist-friendly. By revitalizing parts of the community with pedestrian only plazas, wider sidewalks, landscaping, and traffic calming, private investors are more willing to build or redevelop residential, retail, and office buildings. In addition to private investments, property values increase with the walkability of a neighborhood. Today's young college graduates, who comprise a workforce that can further add to economic growth, prefer walkable urban neighborhoods.





Before



After



Before



After



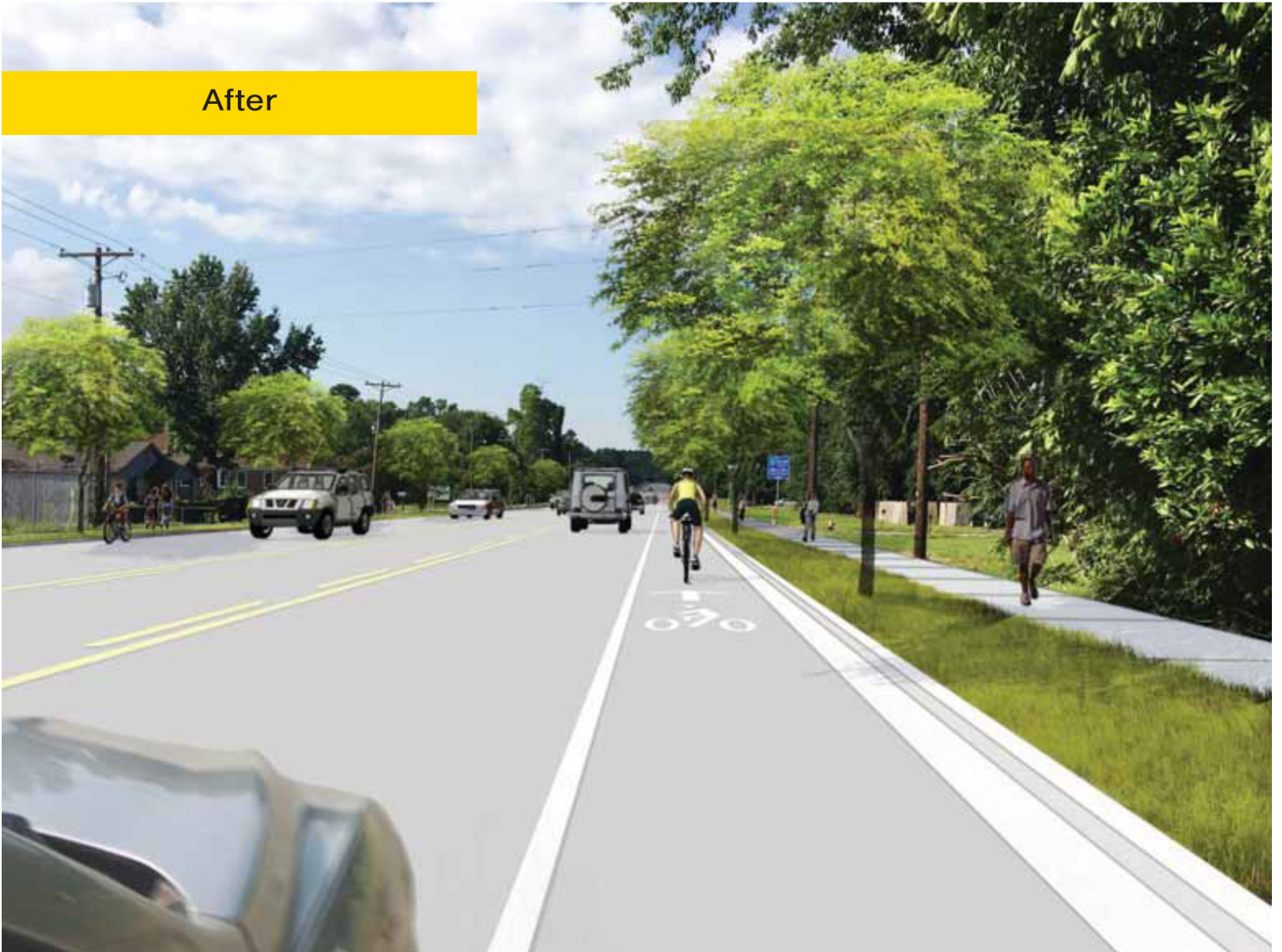
Before



After



Before



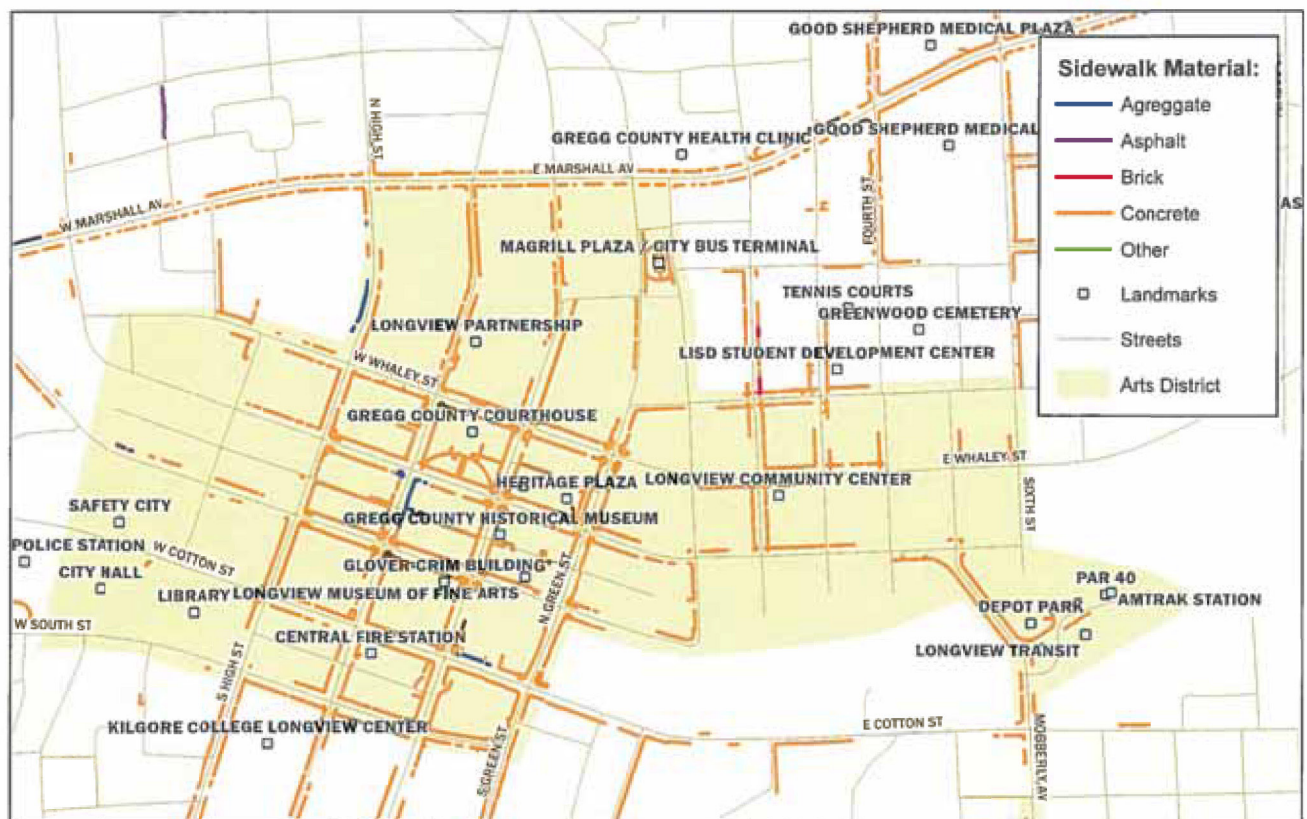
After

# Sidewalk Width: Downtown



The City of Longview does not ensure the accuracy or completeness of the information contained herein.  
20190214GIS1MAA\_Downtown\_Sidewalk\_Width

# Sidewalk Material: Downtown



The City of Longview does not ensure the accuracy or completeness of the information contained herein.  
20190214GIS2MAA\_Downtown\_Sidewalk\_Material

# Sidewalk Condition: Downtown



**Sidewalk Condition:**

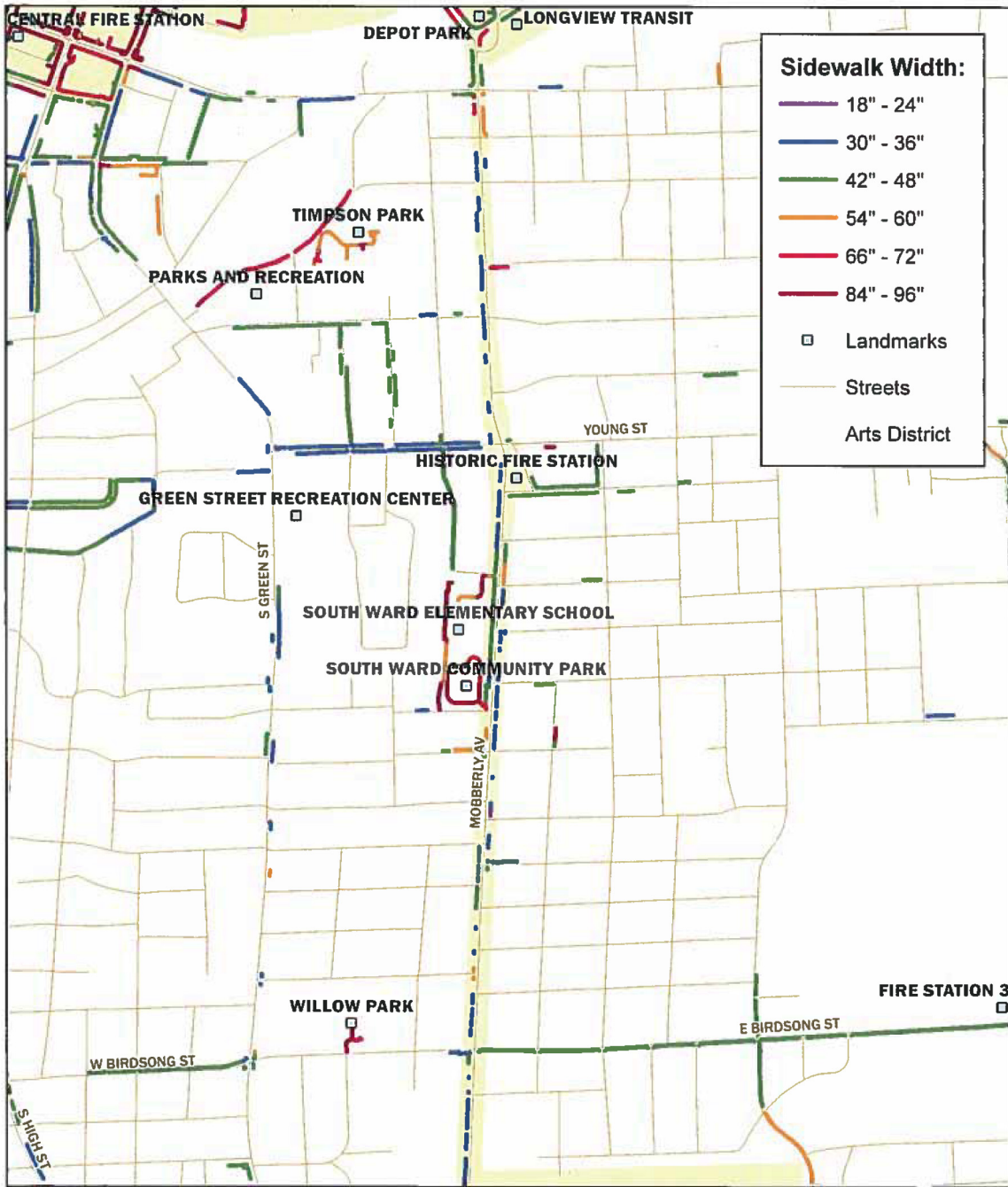
- GOOD
- FAIR
- POOR
- Landmarks
- Streets
- Arts District



The City of Longview does not ensure the accuracy or completeness of the information contained herein.

20190214GIS3MAA\_Downtown\_Sidewalk\_Condition

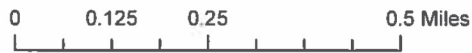
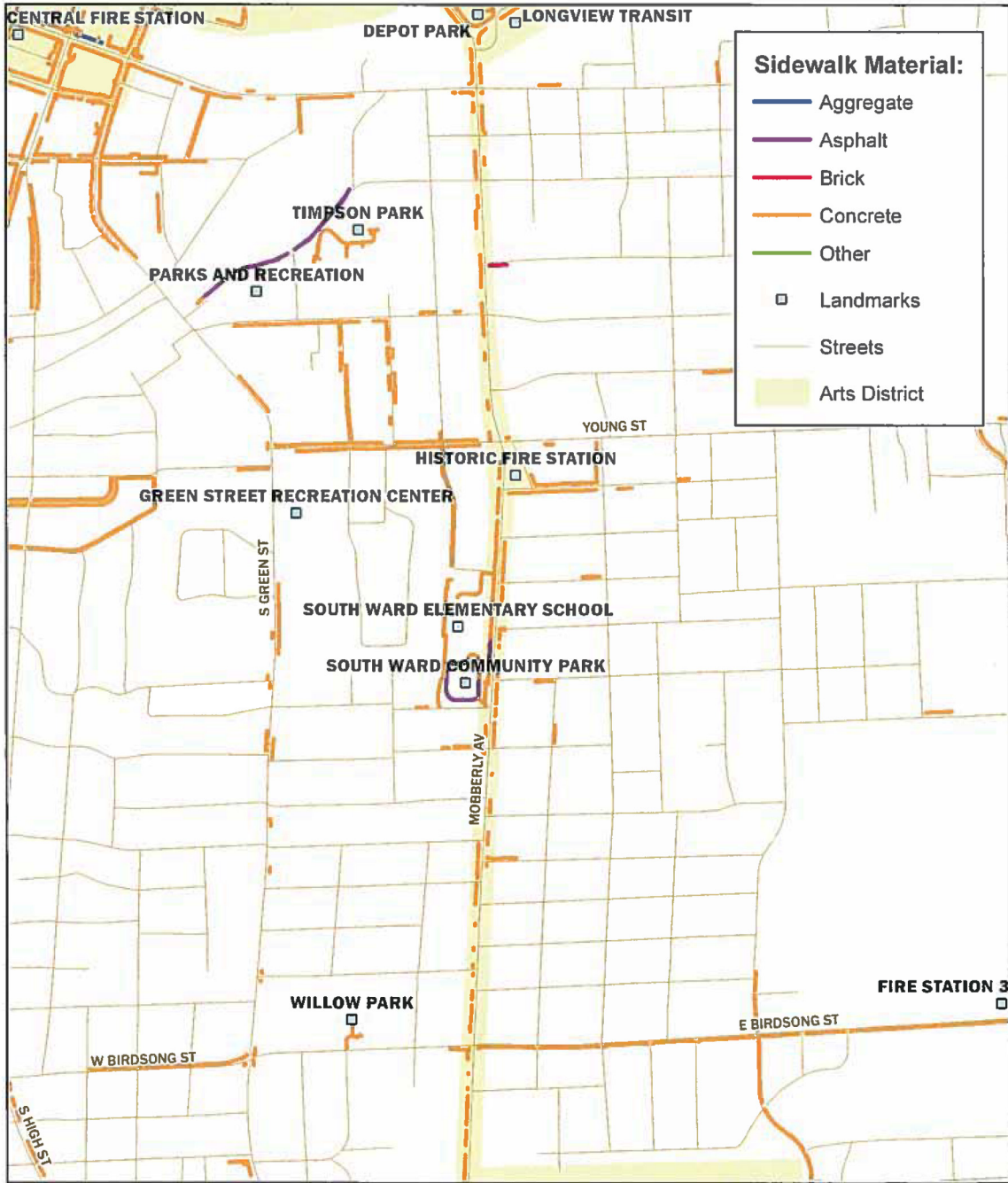
# Sidewalk Width: Mobberly Corridor



The City of Longview does not ensure the accuracy or completeness of the information contained herein.

20190214GIS4MAA\_Mobberly\_Corridor\_Sidewalk\_Width

# Sidewalk Material: Moberly Corridor



The City of Longview does not ensure the accuracy or completeness of the information contained herein.

20190214GIS5MAA\_Moberly\_Corridor\_Sidewalk\_Material

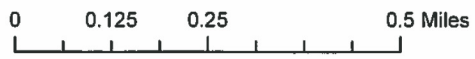


# Sidewalk Condition: Mobberly Corridor



**Sidewalk Condition:**

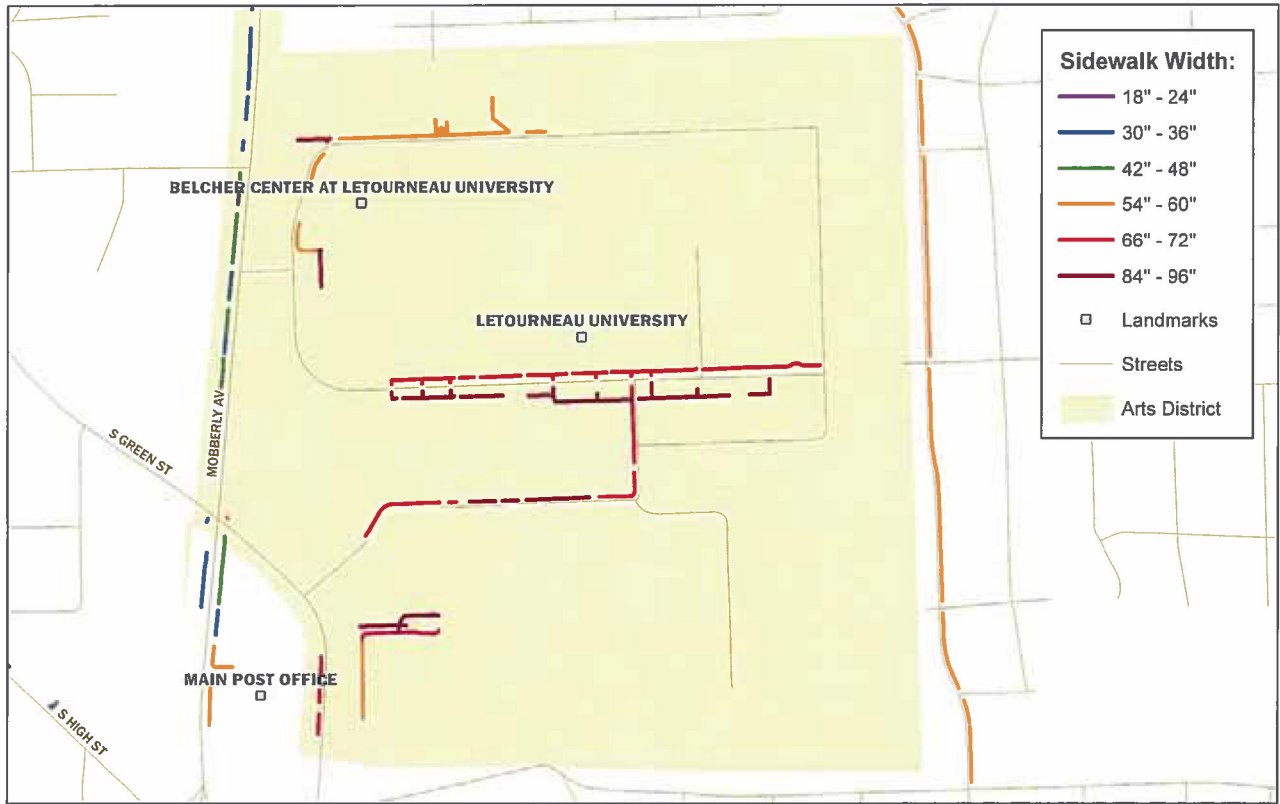
- Good
- Fair
- Poor
- Landmarks
- Streets
- Arts District



The City of Longview does not ensure the accuracy or completeness of the information contained herein.

20190214GIS6MAA\_Mobberly\_Corridor\_Sidewalk\_Condition

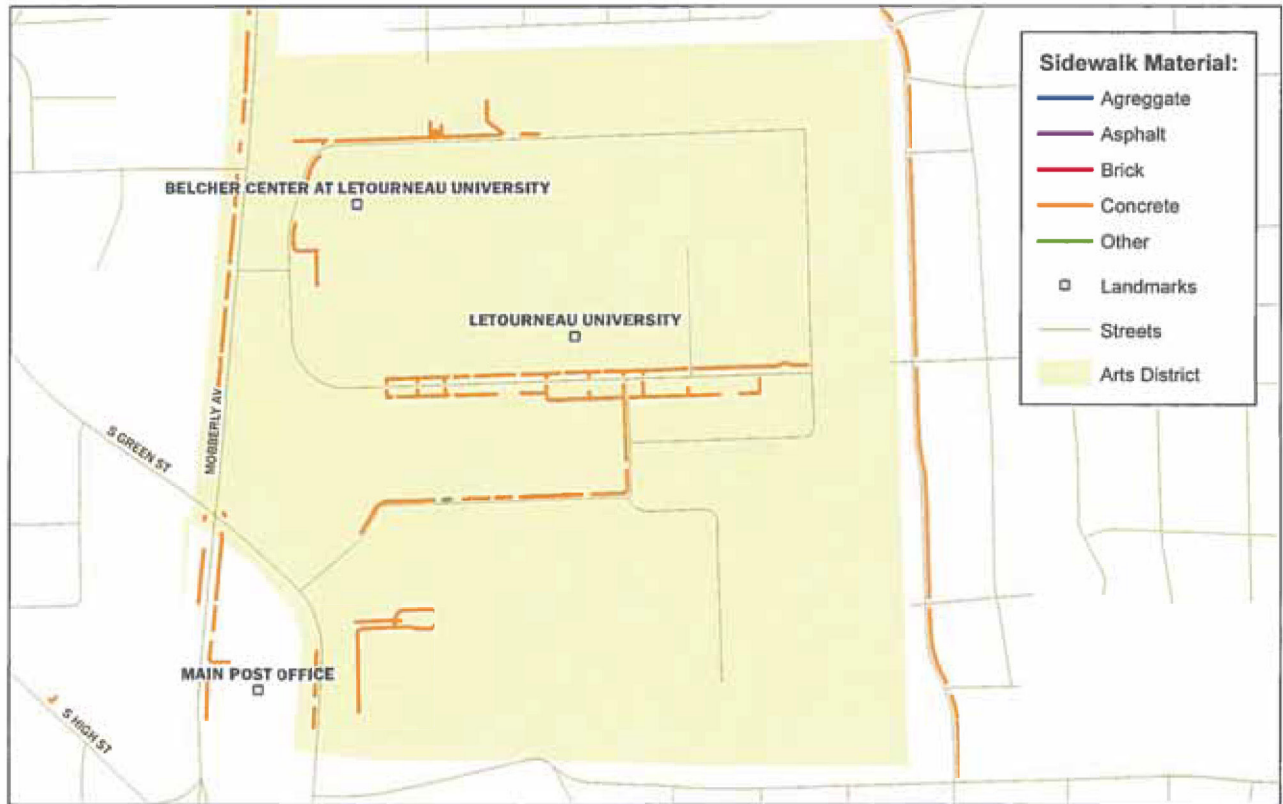
# Sidewalk Width: LeTourneau University



The City of Longview does not ensure the accuracy or completeness of the information contained herein.

20190214GIS7MAA\_LeTourneau\_Sidewalk\_Width

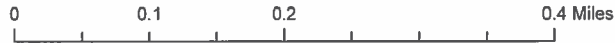
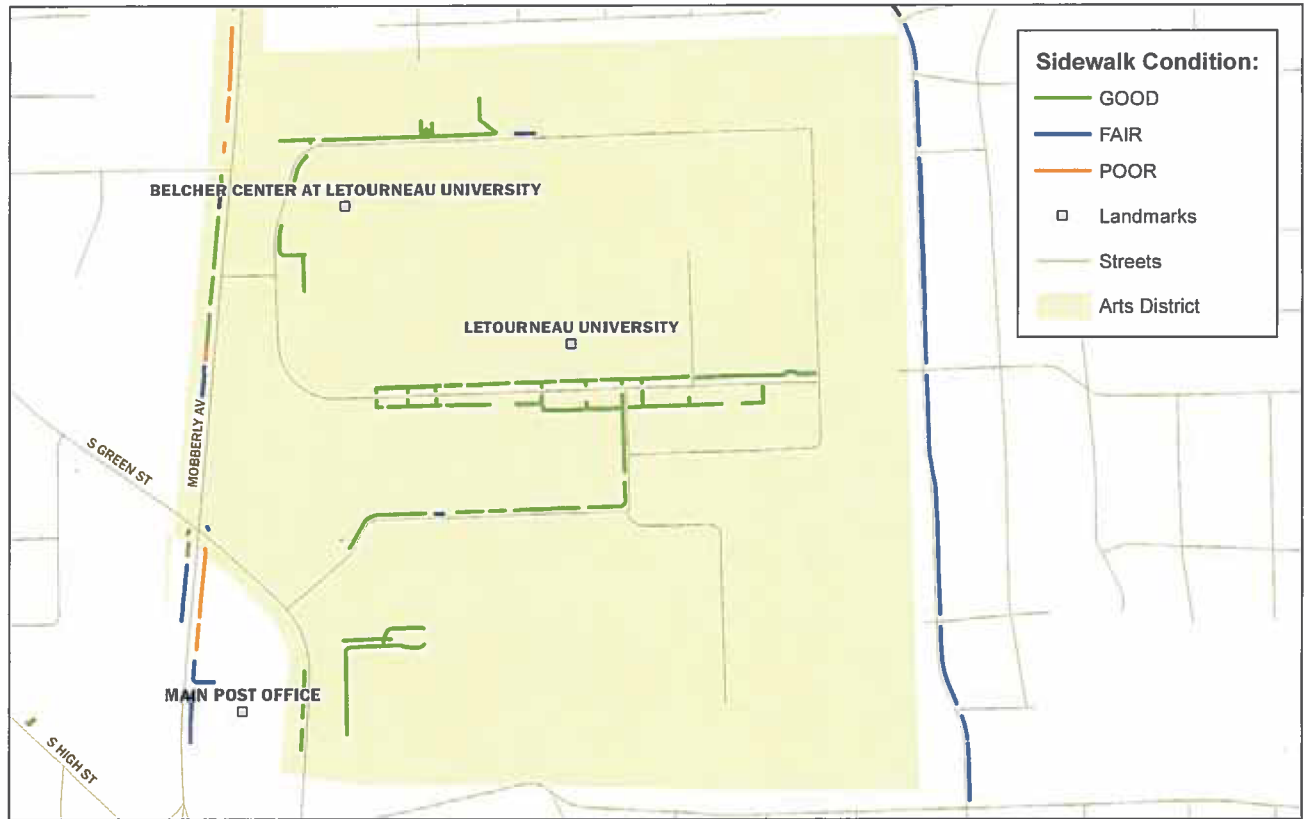
# Sidewalk Material: LeTourneau University



The City of Longview does not ensure the accuracy or completeness of the information contained herein.

20190214GIS8MAA\_LeTourneau\_Sidewalk\_Material

# Sidewalk Condition: LeTourneau University



The City of Longview does not ensure the accuracy or completeness of the information contained herein.

20190214GIS9MAA\_LeTourneau\_Sidewalk\_Condition