CAMINO REAL REGIONAL MOBILITY AUTHORITY
BOARD RESOLUTION

WHEREAS, the Camino Real Regional Mobility Authority (CRRMA) periodically receives federal funding through the Texas Department of Transportation and other agencies to assist in the design and construction of various transportation projects and must therefore comply with the Americans with Disabilities Act (ADA);

WHEREAS, the ADA generally prohibits discrimination in access to government services and public transportation while Title II of the ADA specifically requires that all programs, services, and activities of public entities provide equal access for individuals with disabilities;

WHEREAS, pursuant to and in accordance with the ADA, the CRRMA has recently completed a self-evaluation to determine the extent that persons with disabilities may be restricted in their access to CRRMA programs, services, and activities; and

WHEREAS, the CRRMA has incorporated those findings into a formal ADA Transition Plan that the CRRMA now desires to adopt.

NOW, THEREFORE, BE IT RESOLVED BY THE CAMINO REAL REGIONAL MOBILITY AUTHORITY:

THAT the CRRMA hereby adopts its Americans with Disabilities Act Transition Plan dated November 2026 and authorizes staff to take those steps necessary for implementation.

PASSED AND APPROVED THIS 12TH DAY OF NOVEMBER 2026.

CAMINO REAL REGIONAL MOBILITY AUTHORITY

_____
Joyce A. Wilson
Chair

ATTEST:

_____
Lina Ortega
Board Secretary

APPROVED AS TO CONTENT:

_____
Raymond L. Telles
Executive Director

CAMINO REAL REGIONAL MOBILITY AUTHORITY

AMERICANS WITH DISABILITIES ACT TRANSITION PLAN

Effective: Nov 2026

CAMINO REAL REGIONAL MOBILITY AUTHORITY
AMERICANS WITH DISABILITIES ACT TRANSITION PLAN

Table of Contents

1. Introduction **3**

1.1 Background 3

1.2 ADA Transition Plan 3

1.3 Undue Burden 4

2. Self-Evaluation **4**

2.1 Self-Evaluation Approach 4

2.2 Summary of Findings 5

2.3 Project Partners 5

3. Compliance **6**

3.1 CRRMA's ADA Coordinator 6

3.2 Grievance Procedure 6

CRRMA Nondiscrimination Statement ..... **Appendix A**

CRRMA Adopting Resolution ..... **Appendix B**

1. INTRODUCTION

1.1 Background

The City of El Paso (City) created the Camino Real Regional Mobility Authority (CRRMA) by Council resolution dated March 13, 2007. The CRRMA is a political subdivision of the state of Texas created to develop transportation projects in the El Paso region. This is achieved primarily through partnerships with other governmental agencies, including the Texas Department of Transportation, the City, the County of El Paso, and others. The CRRMA regularly provides planning, design, construction services, and/or financing to complete transportation projects with its partners and works with these partners to ensure compliance with the Americans with Disabilities Act (ADA) while these projects are in development. However, the CRRMA does not normally own the project assets and is not responsible for ADA compliance, as it relates to the ownership or maintenance of the completed transportation projects. While the CRRMA owns very few assets that may be subject to the ADA, the CRRMA is committed to inclusion, non-discrimination, barrier removal, and access for all.

The ADA prohibits discrimination against individuals with disabilities in all areas of public life including transportation facilities and places that are open to the public. The purpose of the law is to ensure that people with disabilities have the same rights and opportunities as everyone else. Title II of the ADA requires that public agencies perform a self-evaluation and create a transition plan which details barriers identified in the agency's assets and communicates an action plan for improving accessibility.

To ensure that the fundamental goal of the ADA is met, Title II of the ADA requires state and local governments to make their programs and services accessible to persons with disabilities. This requirement extends not only to physical access at government facilities, programs, and events, but also to policy changes that governmental entities must make to ensure that all people with disabilities can take part in, and benefit from, the programs and services of the state and local governments. In addition, governmental entities must ensure effective communication, including the provision of necessary auxiliary aids and services, so that individuals with disabilities can participate in civic life.

1.2 ADA Transition Plan Requirements

Title II of the ADA provides that public entities must identify and evaluate all programs, activities, and services and review all policies, practices, and procedures that govern administration of the entity's programs, activities, and services. This evaluation includes all public areas of the physical assets (such as facilities, buildings, parks, and streets) owned or operated by the CRRMA.

ADA requirements for the CRRMA:

- Evaluate programs, services, activities, communication, and right-of ways per the ADA;
- Identify physical and other barriers that may limit access to programs and services;
- Propose potential compliance solutions;
- Determine estimated cost and the responsible party to implement solutions; and
- Develop a time schedule for implementation.

Additionally, the ADA requires the CRRMA to:

- Designate an ADA Coordinator responsible for overseeing compliance;
- Develop an ADA grievance procedure; and
- Maintain the Self-Evaluation and Transition Plan for public inspection for three years.

1.3 Undue Burden

The ADA notes that access to each service, program, or activity is to be "viewed in its entirety" and that program access does not require each facility to be made physically accessible, in all instances. Equal access can be made available through creative solutions.

However, there are instances in which the ADA permits non-compliance. For example, the CRRMA is not required to incur undue financial or administrative burdens in order to comply with the ADA. The determination that ADA compliance would result in an undue burden must be made by the head of the public entity. The Executive Director of the CRRMA is granted this authority, provided that such determination is made by written statement that includes justification.

2. SELF-EVALUATION

2.1 Self-Evaluation Approach

Title II of the ADA provides that public entities must identify and evaluate all programs, activities, and services and review all policies, practices, and procedures that govern administration of the entity's programs, activities, and services.

As alluded to above, the CRRMA does not own any facilities. Rather, the facilities within which it operates are owned and maintained by other governmental agencies. When the City created the CRRMA, the intention was that the new entity remain as a small, streamlined organization that was focused on project development. Accordingly, the City agreed to provide the CRRMA with various in-kind services to reduce administrative burden. By way of example, the City provides the CRRMA with office and meeting space for its activities. Therefore, should a complaint arise related to the CRRMA's office or meeting spaces, the CRRMA would coordinate with the City, as owner of the facility, to address the complaint.

The following list includes the primary spaces utilized by the CRRMA, each of which is owned and maintained by the City:

- Offices and meeting spaces in the City 3 building (801 Texas Avenue);
- City's parking lots (Mills Avenue and Virginia Street).

The CRRMA also owns and operates the SunCycle Bike Share Program, which consists of bicycles for rent and bicycle stations located in public areas. All stations and bicycles in operation have been placed on land owned by other local governmental agencies. Lastly, the CRRMA may also acquire property and rights of way, as part of the development of a transportation project. Any such property or rights of way may be owned by the CRRMA only during the development of the

project and the CRRMA will transfer these parcels to other entities following the construction of road projects. Of note, the resulting transportation projects are designed to be ADA compliant.

The CRRMA evaluated its meeting agendas and website for accessibility. Translation and interpretation services are made available on each agenda posting.

Reevaluation occurred most recently in 2026 as required by this plan and due to a location change for regular CRRMA Board Meetings. Future reevaluations will take place if CRRMA circumstances change including ownership of projects or facilities, use of different City owned facilities, or any other change that could impact public interaction with the agency. At a minimum, the CRRMA will perform a self-evaluation and update its transition plan every five (5) years.

2.2 Summary of Findings

In accordance with Title II of the ADA, the CRRMA has conducted a self-evaluation of the areas identified above. However, those properties and rights of way acquired on behalf of partner agencies were not included in the assessment. While in the CRRMA's possession, these referenced properties and rights of way are part of active construction sites and are not open to the public.

Facility / Program	Barriers Identified	Remedy Proposed
City 3 Building	None Identified	Complaints will be coordinated with the City, as the property owner
City's Parking Lots	None Identified	Complaints will be coordinated with the City, as the property owner
SunCycle (Bike Share Program)	Lack of access for persons unable to ride a traditional adult sized bicycle; no alternative for blind persons	CRRMA is researching potential accommodations
crrma.org	None Identified	If complaints are received, CRRMA staff will work with website provider to make accommodations; the UserWay Accessibility Widget is incorporated to allow users to adjust pages as needed
CRRMA board and committee meetings	None Identified	Translation and interpretation accommodations are offered as part of each agenda posting

No additional remedies are necessary for the CRRMA to maintain compliance with the ADA.

2.3 CRRMA Project Partners

The CRRMA partners with many local entities to construct new roads, shared use paths, bus shelters, and other transportation related facilities. New projects are added periodically and projects are completed throughout each year. CRRMA projects are typically closed to the public

while under construction. The CRRMA does not own or operate any buildings or roadway assets that are open to the public.

The CRRMA currently partners or has recently partnered with the following entities on transportation projects:

Texas Department of Transportation
Texas Parks & Wildlife Department
County of El Paso
City of El Paso
Town of Horizon City
City of Socorro
Village of Vinton
City of San Elizario
Town of Clint
El Paso Water Utility

Should the CRRMA receive a complaint on a project that is ultimately owned by a partner entity, the CRRMA would forward the complaint to the appropriate entity and coordinate a remedy.

3. COMPLIANCE

3.1 CRRMA's ADA Coordinator

The CRRMA has identified its ADA Coordinator as its Director of Finance:

Robert Studer
801 Texas Ave
El Paso, TX 79901
(915) 212-1579
studer@crrma.org

3.2 Grievance Procedure

The CRRMA has established the following grievance procedure for resolution of complaints alleging discrimination on the basis of disability in the provision of CRRMA services, activities, or programs.

The complaint should be made in writing and contain information about the alleged discrimination such as name, address, phone number of complainant, and location, date, and description of the issue. Alternative means of filing complaints will be made available for persons with disabilities upon request.

The complaint should be submitted by the grievant or his/her designee, as soon as possible but no later than sixty (60) calendar days after the alleged violation. The complaint should be submitted to the CRRMA's ADA Coordinator.

Within fifteen (15) calendar days after receipt of the complaint, the ADA Coordinator will schedule a meeting with the complainant to discuss the complaint and possible resolutions. Within fifteen (15) calendar days of the meeting, the ADA coordinator will respond in writing, and where appropriate, in a format accessible to the complainant. The response will explain the position of the CRRMA and offer options for resolution of the complaint.

If the response by the ADA Coordinator does not satisfactorily resolve the issue, the complainant or his/her designee may submit a written appeal of the decision within fifteen (15) calendar days after receipt of the response. Such appeal should be submitted to the Executive Director.

Within fifteen (15) calendar days after receipt of the appeal, the Executive Director will schedule a meeting with the complainant to discuss the complaint and possible resolutions. Within fifteen (15) calendar days after the meeting, the Executive Director respond in writing, and, where appropriate, in a format accessible to the complainant, with a final resolution of the complaint.

The CRRMA shall keep a log of complaints received over a rolling three-year period that includes details about the complaint(s) and resolution(s).

[END OF ADA TRANSITION PLAN]