
VOTING ACCESSIBILITY

POLLING PLACE ACCESSIBILITY

LAWS ON POLLING PLACE ACCESSIBILITY

A combination of Federal and State laws require that all polling places in all elections held in Texas are accessible to voters who are elderly or physically disabled.

I. FEDERAL LAW

A. **Voting Accessibility for the Elderly and Handicapped Act of 1984** [42 U.S.C.A. §§ 1973ee-1—1973ee-6]

1. **Federal elections.** All polling places for federal elections must be accessible to voters who are elderly or disabled.

NOTE: “Federal election” means a general, special, primary or runoff election for the office of President or Vice-President, or of Senator or Representative to Congress.

2. **Compliance.** If a political subdivision does not comply with this law, the United States Attorney General or a person who is personally aggrieved by the non-compliance may bring an action for declaratory or injunctive relief in the appropriate district court. [42 U.S.C.A. § 1973ee-4(a)]

B. **Americans with Disabilities Act (ADA) of 1990** [42 U.S.C.A §§12131-12133]

1. **Implications of the Act.** Polling places must be made accessible in all elections, not only federal elections.
2. **Damages.** A cause of action under the ADA may result in a jury award of money damages. Make sure that your county has a local ADA Coordinator and has completed a self-evaluation plan as required by law.

C. **Help America Vote Act (HAVA) of 2002** [42 U.S.C.A. §§ 15421-15425]

1. **Health and Human Services.** The Secretary of Health and Human Services shall make a payment to state and local political subdivisions that apply in a timely manner to assist those entities in making polling places used in federal elections accessible to the elderly and to voters with disabilities, in compliance with the Voting Accessibility for the Elderly and Handicapped Act of 1984 and the ADA.

2. **Accessibility Voting Device.** There is a federal requirement in HAVA and the corresponding state law to have at least one DRE (or other voting system equipped for individuals with disabilities per polling place).

II. STATE LAW

- A. **General Rule.** All polling places must be accessible to the physically disabled and elderly, without exception.
- B. **Public Building** [Sec. 43.031]
 1. Polling places must be located in a public building “if practicable.” “Practicable” is defined as capable of being accomplished.
 2. If it is not practicable to use any public building as the polling place, a non-public building may be used. However, the law requires that the non-public building must also be accessible to the physically disabled or elderly.
- C. **Summary.** Polling places must be in accessible public buildings within the election precinct if such buildings are available; at no time may an inaccessible building be used as a polling place.

STANDARDS OF ACCESSIBILITY

Standards for buildings to be considered accessible [Sec. 43.034(a)(1)-(5)] – Polling places must comply with the standards established under Article 9102, Revised Statutes, including the following:

- I. The voting area must be: (1) on the ground floor, defined as the floor of the building which can be entered from the street; or (2) accessible by an elevator with doors providing an opening of at least 36 inches in width.
- II. Doors, entrances, and exits used to enter or to leave the polling place must have a minimum width of 32 inches. This applies to all doors, entrances, and exits between the parking area and the voting area.
- III. Any curb adjacent to the main entrance to the polling place must have curb-cuts or temporary non-slip ramps. Curb-cuts are the paved ramps that replace a section of the curb. If it is not possible to install a permanent ramp before the election, temporary ramps may be utilized.
- IV. Any stairs necessary to enter or leave the polling place must have handrails on each side of the stairs and a non-slip ramp.

- V. The polling place may not have any barrier that impedes the path of the physically disabled to the voting station. Any of the following can constitute a barrier: gravel, any break in the walkway over 1/4 inch in height, automatically closing gates, closed doors without lever type handles, and objects protruding from walls which a visually handicapped person cannot detect with a cane.

NOTE: An “ADA Checklist for Polling Places” follows this outline. We suggest you use this as a tool for evaluating your polling locations for accessibility. You are not required to submit this survey to our office.

FAILURE TO COMPLY

The Americans with Disabilities Act (ADA) is a comprehensive civil rights law for people with disabilities. The Department of Justice (the “DOJ”) enforces the ADA’s requirements in three areas:

- (1) Title I: Employment practices by units of State and local government
- (2) Title II: Programs, services, and activities of State and local government
- (3) Title III: Public accommodations and commercial facilities

I. **Enforcement.** Through lawsuits and both formal and informal settlement agreements, the DOJ has achieved greater access for individuals with disabilities in thousands of cases. Under general rules governing lawsuits brought by the Federal Government, the DOJ may not file a lawsuit unless it has first unsuccessfully attempted to settle the dispute through negotiations.

A. **Litigation.** The DOJ may file lawsuits in Federal court to enforce the ADA and may obtain court orders including compensatory damages and back pay to remedy discrimination. Under Title III of the ADA, the DOJ may also obtain civil penalties of up to \$55,000 for the first violation and \$110,000 for any subsequent violation.

B. **Private litigation.** Private individuals may bring lawsuits in which they can obtain court orders to stop discrimination, subject to the same monetary limits for civil penalties of \$55,000 for the first violation and \$110,000 for any subsequent violation; however, they may also seek punitive damages, reasonable attorney’s fees, litigation expenses, and court costs.

II. **Formal settlement agreements.** The DOJ sometimes resolves cases without filing a lawsuit by means of formal written settlement agreements.

III. **Other settlements.** The DOJ resolves numerous cases without litigation or formal settlement agreement. In some instances, the public accommodation, commercial facility, or State or local government promptly agrees to take the necessary actions to achieve compliance. In others, extensive negotiations are required.

COMMON QUESTIONS

Q: Not all of our polling places are accessible, but we offer curbside voting. Isn't that enough?

A: Curbside voting is NOT an alternative to providing accessible polling places. Texas law requires both physical accessibility of polling places AND curbside voting procedures.

Q: Is each polling place required to have a wheelchair accessible booth?

A: Yes. If a booth is unavailable, a table can be used. Just be sure to erect a folding wooden or sturdy cardboard "booth" on an open tabletop to ensure the voter's privacy.

Q: In addition to making sure that our polling places are accessible, what other simple changes could my county make to help voter with physical disabilities?

A: (1) Make sure your polling places are accessible by arranging for one or more disabled voter to visit your locations before election day. They might detect accessibility problems you may have overlooked.

(2) Have large print signs posted at the parking lot or curb indicating the closest and most easily accessible entrance to the polling place.

(3) Emphasize the importance of courtesy to all voters in any election training you conduct and remind election judges and clerks to be particularly sensitive to the needs of voters with disabilities. To learn about disability etiquette, contact the Department of Assistive and Rehabilitative Services (formerly the Texas Commission for the Blind) at 1-800-628-5115 and ask to view their short video tape on the subject or visit the City of San Antonio's website to read their [Disability Etiquette Handbook](#).

(4) Communicate with members of the disabled community in your area about the manner of providing a secret ballot, where accessible polling sites could be located, where the majority of the disabled population is located in your political subdivision, and what transportation methods exist in the county.

VOTING SYSTEM ACCESSIBILITY

I. Voting System Accessibility

A. Requirements. A county or political subdivision must provide at least one accessible voting system in each early voting and election day polling place, that complies with the following: [Sec. 61.012(a)(1)(C)]

1. **Section 504 of the federal Rehabilitation Act of 1973 (29 U.S.C. Section 794);**

2. **Title II of the federal Americans with Disabilities Act (42 U.S.C. Section 12131 et seq.);**
3. **42 U.S.C. Section 15481(a)(3).** Each voting system (including any lever voting system, optical scan voting system, or direct recording electronic system) used in an election in which a federal office is on the ballot must meet the following requirements:
 - a. permit the voter to verify (in a private and independent manner) the votes selected by the voter on the ballot before the ballot is cast and counted;
 - b. provides the voter with the opportunity (in a private and independent manner) to change the ballot or correct any error before the ballot is cast and counted; and
 - c. provide notifications to the voter, if the voter selects votes for more than one candidate for a single office, and provide the voter the opportunity to correct the ballot before the ballot is cast and counted.
 - d. **Voting systems – accessibility for individuals with disabilities.** The voting system shall be accessible for individuals with disabilities, including nonvisual accessibility for the blind and visually impaired, in a manner that provides the same opportunity for access and participation.
 - e. **Polling place requirements.** Counties and political subdivisions must provide at least one direct recording electronic voting system or other voting system that satisfies the above requirements, for individuals with disabilities at each polling place.

- B. Exemption.** For all elections in which a federal office is not on the ballot, a county or a political subdivision located within a county with a population described below may be able to obtain an exception from the general requirement of providing one accessible voting system in each polling place. [Sec. 61.013]

NOTE: Exemption is not available to a county when a federal office appears on the ballot or to a political subdivision when the election of the political subdivision is held jointly with an election in which a federal office appears on the ballot.

1. **Notice and Publication Requirement.** Political subdivisions must file a written notice with the Texas Secretary of State stating which exemption

they seek to utilize. *See*, “Possible Exemptions” below, for the list of exemptions that may be claimed.

- a. **Notice deadline.** The notice must be filed no later than 90 days prior to election day. *See* the Notice of Exemption, Application of Undue Burden Status. You are not required to use the form prescribed by our office.
- b. **Newspaper publication deadline.** No later than the 15th day before the start of early voting by personal appearance, counties or political subdivisions using exemption no. 2, 3, or 4 must publish notice in a newspaper of general circulation of the location of each early voting and election day polling place that will contain an electronic voting system.

2. **Possible exemptions.** Population is determined by the most recent (2010) Federal Census numbers.

- a. **Population less than 2,000.** Counties with a population of less than 2,000 are exempt from the requirement of providing accessible electronic voting systems.
 - i. **Political subdivision within a county with a population less than 2,000.** Political subdivisions located in a county with a population of less than 2,000 are exempt from the requirement of providing accessible electronic voting systems.
 - ii. **Reasonable accommodation.** A voter with a disability may request a reasonable accommodation by the 21st day before election day with the early voting clerk. A reasonable accommodation may include providing an audio tape of the ballot for the voter or a template which lays over the ballot and allows a voter with visual impairment to vote independently and in privacy.
- b. **Population of 2,000 or more but less than 5,000.** Counties with a population of 2,000 or more but less than 5,000 must provide at least one accessible electronic voting system on election day.
 - i. **Political subdivision within a county with a population of 2,000 or more but less than 5,000.** Political subdivisions located in a county with a population of 2,000 or more but less than 5,000 must provide at least one accessible electronic voting system on election day.

NOTE: Location of accessible electronic voting system.

We suggest you place the accessible electronic voting system be located at the early voting clerk's office.

- c. **Population of 5,000 or more but less than 10,000.** Counties with a population of 5,000 or more but less than 10,000 must provide at least one accessible electronic voting system on election day and during the period of early voting by personal appearance.
 - i. **Political subdivision within a county with a population of 5,000 or more but less than 10,000.** Political subdivisions located in a county with a population of 5,000 or more but less than 10,000 must provide at least one electronic voting system during the period for early voting by personal appearance and on election day.

NOTE: Location of accessible electronic voting system.

We suggest the accessible electronic voting system be located at the main early voting polling place during early voting and at the early voting clerk's office on election day.

- d. **Population of 10,000 or more but less than 20,000.** Counties with a population of 10,000 or more but less than 20,000 (or political subdivisions located in such a county) may provide fewer accessible voting stations (than one in every early voting and election day polling place) if they comply with the following requirements:
 - i. Submit an **Application of Undue Burden Status** to the Secretary of State showing that compliance with Section 61.012(a)(1)(C) would cause an undue burden on the political subdivision by increasing the costs associated with the election by at least 25% as compared to the costs of the last general election held by the subdivision before January 1, 2006;
 - ii. Submit the application to the Secretary of State, no later than the 90th day before the date of the election for which the subdivision seeks relief;
 - iii. The Secretary of State will determine whether to approve the request for undue burden no later than the 20th day after the date it receives the application and inform the

applicant as soon as possible after making that determination;

- iv. If the Secretary of State approves the request for undue burden status, the entity must:
 - (a.) Provide at least one accessible electronic voting system during the period of early voting by personal appearance and on election day;
 - (b.) If the subdivision has branch early voting locations, provide one mobile accessible electronic voting system to be deployed at least once to each branch early voting polling place; and
 - (c.) Publish notice in a newspaper of the location of the accessible voting machines. *See*, Notice and Publication Requirement, above.
- e. **Political subdivision in more than one county.** If your political subdivision is in more than one county and you fall into one of the 4 categories above, you may choose to be considered either:
 - i. as being located in the county that contains the greatest number of registered voters of your subdivision; or
 - ii. for each portion of your subdivision located in a different county to be considered as a separate subdivision.
- f. **Water districts.** If you are a water district, you may claim an exemption under Section 49.111 of the Texas Water Code, as amended by Senate Bill 902. Please contact our office if you need guidance on this process.

ADDITIONAL MATERIALS

At the end of this outline, you will find the following:

1. Information Sources
2. “Meeting People with Disabilities” Information Sheet produced by the Texas Secretary of State.
3. Poll Worker’s Tip Sheet, produced by the National Organization on Disability
4. Texas Election Administrators Guide to Working with Voters with Disabilities, produced by Disability Rights Texas.
5. Texas Administrative Code Section 81.57
6. ADA Checklist for Polling Places, produced by the U.S. Department of Justice

INFORMATION SOURCES

For further information, you wish to contact one of the following groups:

1. **Texas Governor's Committee on People with Disabilities**

P.O. Box 12428
Austin, Texas 78711
(512) 463-5739
(512) 463-5746 (TDD)
Fax: (512) 463-5745
Dial 711 for Relay Texas
<http://governor.state.tx.us/disabilities/>

This agency is the single best source of answers for specific local government accessibility questions and issues. They are committed to helping local entities resolve disability problems before litigation occurs. They currently support a statewide network of community level committees on people with disabilities located in over 30 counties and cities across Texas.

2. **Texas Workforce Commission Vocational Rehabilitation Services (formerly Department of Assistive and Rehabilitative Services – Division for Blind Services)**

101 E. 15th Street, Suite 370
Austin, Texas 78701
(800) 628-5115
<http://www.dars.state.tx.us/dbs/>

<http://www.twc.state.tx.us/jobseekers/vocational-rehabilitation-services>

The website for the Department of Assistive and Rehabilitative Services referenced above is scheduled for suspension after July 31, 2018. Please update your bookmarks accordingly.

3. **Coalition of Texans with Disabilities**

1716 San Antonio St.
Austin, Texas 78701
(512) 478-3366
Fax: (512) 478-3370
E-mail: info@txdisabilities.org
<https://www.txdisabilities.org/>

This organization is a social and economic impact organization representing people of all disabilities and all ages. Through governmental advocacy public awareness activities, and professional disability consulting, CTD ensures that persons with disabilities may work, live, learn, play and participate fully in the community of their choice.

4. **Disability Rights Texas**

2222 West Braker Lane
Austin, Texas 78758
(512) 454-4816 (Voice)
Fax: (512) 323-0902
(866) 362-2851 (Video Phone)
<http://www.disabilityrightstx.org>

The mission of this organization is to advocate for, protect, and advance the legal, human, and service rights of people with disabilities.

5. **Health and Human Services Commission (formerly Department of Assistive and Rehabilitative Services – Office for Deaf and Hard of Hearing Services)**

4900 N. Lamar
Austin, Texas 78751
512-438-4880
Fax: 512-438-4777
<http://www.dars.state.tx.us/dhhs>

<https://hhs.texas.gov/services/disability/deaf-hard-hearing>

The website for the Department of Assistive and Rehabilitative Services referenced above is scheduled for suspension after July 31, 2018. Please update your bookmarks accordingly.

6. **Texas Council for Developmental Disabilities**

6201 E. Oltorf, Suite 600
Austin, Texas 78741
(512) 437-5432
(512) 437-5431 (TDD)
(800) 262-0334
Fax: (512) 437-5434
<http://www.txddc.state.tx.us/>

The Texas Council for Developmental Disabilities is dedicated to ensuring that all Texans with developmental disabilities have the opportunity to be independent, productive and valued members of their communities. Using a variety of methods, the Council works to ensure that the service delivery system provides comprehensive service and support, is easy to access and is cost effective. They also work to improve people's understanding of disability issues.

7. **Texas Department of Licensing and Regulation, Architectural Barriers Section (TDLR)**

P.O. Box 12157

Austin, Texas 78711

(512) 463-6599

(877) 278-0999

(800) 735-2989 (Relay/Texas-TDD)

(800) 735-2988 (Relay/Texas-Voice)

E-Mail: CS.Architectural.Barriers@license.state.tx.us

<http://www.license.state.tx.us/ab/ab.htm>

TDLR oversees and assists in compliance with the Texas Architectural Barriers Act (TABAA). TABAA mandates accessibility in publicly and privately-funded buildings and facilities, as well as facilities leased or occupied by state agencies. It applies to temporary or emergency construction in addition to permanent construction.

8. **Department of Justice ADA Information Line**

(800) 514-0383

(800) 514-0301 (Relay Texas – Voice)

www.ada.gov

MEETING PEOPLE WITH DISABILITIES

1. It's okay to offer your help to someone . . . but ask first. Or wait for someone to ask for help.
2. It's okay to ask people about their disabilities and it's okay for them not to talk about it.
3. Remember, just because people are using wheelchairs or crutches or just because they have a disability doesn't mean they are sick. Many people with disabilities are healthy and strong.
4. When talking with people who use wheelchairs, sit down so they won't have to look up at you. Don't lean or sit on their chairs.
5. It's okay to use words like "see," "hear," "run," and "walk" when talking with people with disabilities.
6. Using words like "cripple," "afflicted," "retard," or "victim," among others, is not preferable when referring to people or voters with disabilities because they tend to be demeaning and promote negative perceptions.
7. It's okay to ask people who are deaf or people who have speech impairments to repeat what they say if you don't understand them the first time.
8. If an interpreter is helping you speak with a person who is deaf, make sure you talk to that person, not the interpreter.
9. People who are blind hear as well as anybody. Don't speak loudly when speaking to them or other people with disabilities.
10. People with disabilities like to have fun also. Think of ways to include them in activities with friends or co-workers.
11. Canine companions, such as seeing-eye dogs or hearing-ear dogs, are on the job. Never pet or play with them because it may distract them from their work.
12. Do not park in parking spaces designated for people with disabilities – even for a few minutes! They need the space more than you do.
13. Treat a person with disabilities the way you like to be treated – fairly, with respect and consideration.

Poll Workers' Tip Sheet: A Guide for Working with Voters Disabilities at the Polls

From the National Organization on Disability

As Americans with disabilities increasingly participate in the life of their communities, more of them will want to vote in person at the polls rather than use absentee ballots. To assist election officials, poll workers and disability organizations cooperating with them, the National Easter Seals Society and the National Organization on Disability have produced this information sheet with suggestions for making voting easier for all concerned.

Common Courtesies & Guidelines

- Be considerate of the extra time it might take for a person who has a disability or is elderly to get things done, and give unhurried attention to a person who has some difficulty speaking.
- Speak directly to the person who has a disability rather than to a companion who may be along.
- Speak calmly, slowly and directly to a person with a hearing problem. Your facial expressions, gestures, and body movements help in understanding. Don't shout or speak in the person's ear. If full understanding is doubtful, write a note to the person with the hearing problem.
- Before pushing someone in a wheelchair, ask if you may do so and how you should proceed.
- Greet a person who is visually impaired by letting the person know who and where you are. Provide a guiding device such as a ruler or card for signing forms. When offering walking assistance, allow the person to take your arm and tell him or her when you are approaching inclines, or turning right or left.
- Be aware that animals who assist people with disabilities should be admitted into all buildings. Such animals are highly trained and need no special care other than that provided by the owner. One should not interfere with the animal's responsibilities by talking to or playing with them.
- Be aware that federal law allows voters with disabilities to be accompanied by and receive assistance from another person of their choice in the voting booth.
- Remember that all voters deserve courteous attention in exercising their rights as citizens to vote.
- Persons with psychiatric or mental disabilities have the same right to exercise their franchise as anyone else, although a few states have specific laws regarding these citizens' voting rights. Be mindful that it is not the poll worker's responsibility to pass judgment.

For more information, visit the National Organization on Disability Web Site at www.nod.org.

Texas Administrative Code

Section 81.57

- (a) A voting system shall be accessible to voters with physical disabilities including no vision, low vision (visual acuity between 20/70 and 20/200, and/or 30 degree or greater visual-field loss), no hearing, low hearing, limited manual dexterity, limited reach, limited strength, no mobility, low mobility, or any combination of the foregoing (except the combination of no hearing and no vision, see subsection (b) of this section), by providing voters with physical disabilities with a practical and effective means to cast an independent and secret ballot in accordance with each of the following, assessed independently and collectively:
- (1) The voting system shall provide a tactile-input or speech-input device, or both; and
 - (2) The voting system shall provide a method by which voters can confirm any tactile or audio input by having the capability of audio output using synthetic or recorded human speech, which is reasonably phonetically accurate; and
 - (3) The voting system shall provide a means for a voter to change the voter's selection prior to the voter casting the ballot; and
 - (4) Any operable controls on the input device that are needed for voters without vision shall be discernable tactilely without actuating the keys. (Note: All the buttons on the device would not have to be discernable tactilely, only those buttons that are actually required for the individual to use the "operation without vision" mode.); and
 - (5) Any audio and non-audio access approaches shall be able to work both separately and simultaneously; and
 - (6) If a non-audio access approach is provided, the system shall not require color perception; the system shall use black text or graphics, or both, on white background or white text or graphics, or both, on black background, unless the office of the Secretary of State approves other high-contrast color combinations that do not require color perception; and
 - (7) Any voting system that requires any visual perception shall offer the election official who programs the system, prior to its being sent to the polling place, the capability to set the font size to a level that can be read by voters with low vision. (Note: Although there is no standard font size for this situation, a san-serif font of 18 points as printed on a standard 8.5 x 11 piece of paper will allow the most universal access.); and
 - (8) The voting system shall provide audio information, including any audio output using synthetic or recorded human speech or any auditory feedback tones that are important for the use of the audio approach, through at least one mode (e.g., by handset or headset) in enhanced auditory fashion (i.e., increased amplification), and shall provide incremental volume control with output amplification up to a level of at least 97 dB SPL, with at least one intermediate step of 89 dB SPL; and

- (9) For transmitted voice signals, the voting system shall provide a gain adjustable up to a minimum of 20 dB with at least one intermediate step of 12 dB of gain; and
- (10) For the safety of others, if the voting system has the possibility of exceeding 120 dB SPL, then a mechanism shall be included to reset the volume automatically to a safe level after every use (e.g., when handset is replaced) but not before; and
- (11) If sound cues and audible information, such as "beeps" are used, there shall be simultaneous corresponding visual cues and information; and
- (12) If a non-audio approach is used in conjunction with an audio counterpart, any spoken text shall also be presented on screen, with the exception that any auditory confirmation of a voter's selection as required by subsection (b) of this section shall not be printed in text on the screen (Note: A graphic representation of a ballot with a check, "X," etc. beside a candidate or proposition is allowed.); and
- (13) All controls and operable mechanisms shall be operable with one hand, including with a closed fist, and operable without tight grasping, pinching, or twisting of the wrist; and
- (14) The force required to operate or activate the controls shall be no greater than 5 lbf (pounds per square foot); and
- (15) If a forward approach by a person in a wheelchair to a voting system is necessary, the maximum high-forward reach allowed shall be 48 inches (1220 mm) and the minimum low-forward reach shall be 15 inches (380 mm). If the high-forward reach is over an obstruction, reach and clearances shall be as shown in the figure below or otherwise in accordance with the ADAAG, as written at the time the system is certified for use in the state of Texas; and

Attached Graphic

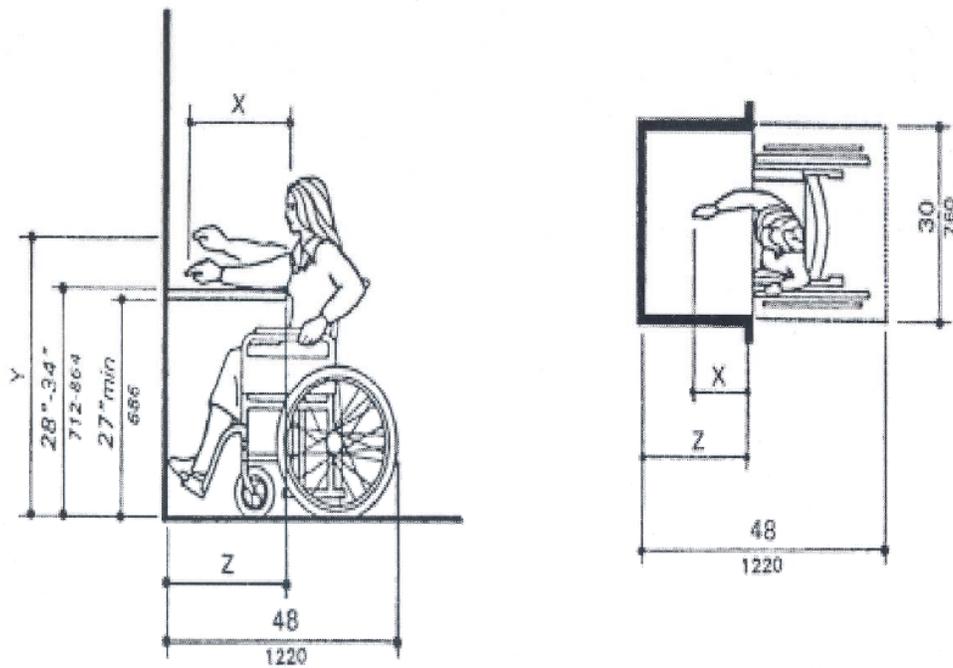
- (16) If a side or parallel approach by a person in a wheelchair to a voting system is necessary, the maximum side reach allowed shall be 54 inches (1370 mm) and the low side reach shall be no less than 9 inches (230 mm) above the floor. If the side reach is over an obstruction, reach and clearances shall be as shown in the figure below or otherwise in accordance with the ADAAG, as written at the time the system is certified for use in the state of Texas; and

Attached Graphic

- (17) The highest operable part of controls, dispensers, receptacles, and other operable equipment shall be placed within at least one of the reach ranges outlined in paragraphs (15) and (16) of this subsection.

- (b) Although we strongly encourage voting system vendors to strive to develop systems that will provide a secret ballot for all individuals, this office recognizes that the technology available at the time of the adoption of this section will not accommodate voters who have a combination of no hearing and no vision. A voting system may be considered accessible and in compliance with state law without allowing voters with a combination of no hearing and no vision to cast a secret ballot.

Figure: 1 TAC §81.57(a)(15)



NOTE: x shall be ≤ 25 in(635 mm); z shall be $\geq x$. When x < 20 in(510 mm), then y shall be 48 in(1220 mm) maximum. When x is 20 to 25 in(510 to 635 mm), then y shall be 44 in(1120 mm) maximum.

Figure 1, Maximum Forward Reach over Obstruction

Figure: 1 TAC §81.57(a)(16)

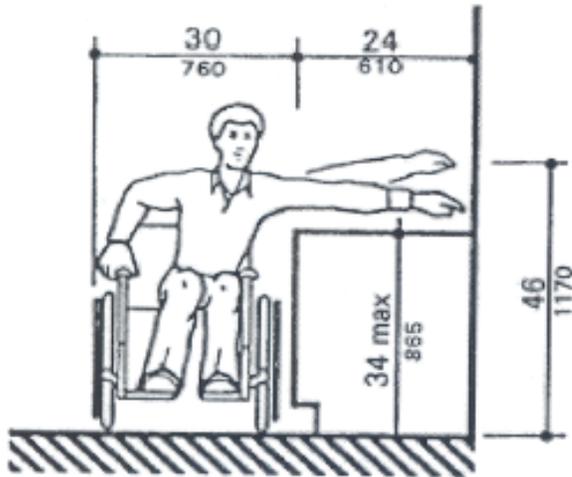


Figure 2, Maximum Side Reach over Obstruction