



Mankato Area Planning Organization ADA Transition Plan

December 2023



**Stonebrooke
Engineering**

Table of Contents

Part 1 - MAPO Partner Agency Requirements and Project Purpose.....3

Part 2 - City of Eagle Lake ADA Transition Plan and Inventory.....18

Part 3 - City of Mankato ADA Transition Plan and Inventory.....41

Part 4 - City of North Mankato ADA Transition Plan and Inventory.....95

Part 5 - City of Skyline ADA Transition Plan and Inventory.....129

Part 6 - Blue Earth County ADA Transition Plan and Inventory.....134

Part 7 - Nicollet County ADA Transition Plan and Inventory.....172

Project Management Team

- Chris Talamantez, MAPO

Shawn Schloesser, MAPO

Paul Vogel, MAPO

Jon Nelson, City of Mankato

Molly Westman, City of Mankato

Edell Fisher, City of Mankato

Stefan Gantert, Blue Earth County
- Matt Lassonde, City of North Mankato

Jennifer Bromeland, City of Eagle Lake

Ryan Thilges, Blue Earth County

Seth Greenwood, Nicollet County

Consultant Team

- Britt Berner
- Tim Arvidson
- Kelly Besser

Part 1 - MAPO Partner Agency Requirements and Project Purpose

INTRODUCTION

Need and Purpose

The Americans with Disabilities Act (ADA), enacted on July 26, 1990, is a civil rights law prohibiting discrimination against individuals on the basis of disability. ADA consists of five titles outlining protections in the following areas:

1. Employment
2. State and local government services
3. Public accommodations
4. Telecommunications
5. Miscellaneous Provisions

Title II of ADA pertains to the programs, activities and services public entities provide. As providers of public transportation services and programs, MAPO partner agencies must comply with this section of the Act as it specifically applies to public service agencies. Title II of ADA provides that, "...no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity." [42 USC. Sec. 12132; 28 CFR. Sec. 35.130]

As required by Title II of ADA, 28 CFR. Part 35 Sec. 35.105 and Sec. 35.150, MAPO partner agencies have conducted Self-Evaluations of facilities within public rights-of-way and have each developed a Transition Plan detailing how the agency will ensure that all facilities are accessible to all individuals.

ADA and its Relationship to Other Laws

Title II of ADA is companion legislation to two previous federal statutes and regulations: the Architectural Barriers Acts of 1968 and Section 504 of the Rehabilitation Act of 1973.

The Architectural Barriers Act of 1968 is a Federal law that requires facilities designed, built, altered or leased with Federal funds to be accessible. The Architectural Barriers Act marks one of the first efforts to ensure access to the built environment.

Section 504 of the Rehabilitation Act of 1973 is a Federal law that protects qualified individuals from discrimination based on their disability. The nondiscrimination requirements of the law apply to employers and organizations that receive financial assistance from any Federal department or agency. Title II of ADA extended this coverage to all state and local government entities, regardless of whether they receive federal funding or not.

Agency Requirements

Under Title II, MAPO partner agencies must meet these general requirements:

- Must operate their programs so that, when viewed in their entirety, the programs are accessible to and useable by individuals with disabilities [28 C.F.R. Sec. 35.150].
- May not refuse to allow a person with a disability to participate in a service, program or activity simply because the person has a disability [28 C.F.R. Sec.35.130 (a)].
- Must make reasonable modifications to policies, practices and procedures that deny equal access to individuals with disabilities unless a fundamental alteration in the program would result [28 C.F.R. Sec. 35.130(b) (7)].

- May not provide services or benefits to individuals with disabilities through programs that are separate or different unless the separate or different measures are necessary to ensure that benefits and services are equally effective [28 C.F.R. Sec. 35.130(b)(iv) & (d)].
- Must take appropriate steps to ensure that communications with applicants, participants and members of the public with disabilities are as effective as communications with others [29 C.F.R. Sec. 35.160(a)].
- Must designate at least one responsible employee to coordinate ADA compliance [28 C.F.R. Sec. 35.107(a)]. This person is often referred to as the “ADA Coordinator.” The public entity must provide the ADA coordinator’s name, office address, and telephone number to all interested individuals [28C.F.R Sec. 35.107(a)].
- Must provide notice of ADA requirements. All public entities, regardless of size, must provide information about the rights and protections of Title II to applicants, participants, beneficiaries, employees, and other interested persons [28 C.F.R Sec. 35,106]. The notice must include the identification of the employee serving as the ADA coordinator and must provide this information on an ongoing basis [28 C.F.R Sec. 104.8(a)].
- Must establish a grievance procedure. Public entities must adopt and publish grievance procedures providing for prompt and equitable resolution of complaints [28 C.F.R Sec. 35.107(b)]. This requirement provides for a timely resolution of all problems or conflicts related to ADA compliance before they escalate to litigation and/or the federal complaint process.

Document Organization

Each MAPO partner agency’s infrastructure, practices, and policies were inventoried and documented separately, given varying contexts and ownership. ADA Transition Plans were developed to meet the specific needs of each partner agency which are included in Parts 2-7 of this document. The following outlines subsequent parts of this document as they pertain to each MAPO partner agency:

Part 2 – The City of Eagle Lake ADA Transition Plan and Inventory

Eagle Lake has an estimated population of 3,286. The city contains:

- 67 sidewalk and trail segments
- 121 pedestrian ramps
- 8 crosswalks

Part 3 – The City of Mankato ADA Transition Plan and Inventory

Mankato has an estimated population of 44,693. The city contains:

- 1951 sidewalk and trail segments
- 3092 pedestrian ramps.
- 86 bus stops
- 287 traffic signal push buttons
- 527 crosswalks

Part 4 – The City of North Mankato ADA Transition Plan and Inventory

North Mankato has an estimated population of 14,448. The city contains:

- 707 sidewalk and trail segments
- 1085 pedestrian ramps
- 14 bus stops
- 46 traffic signal push buttons
- 465 crosswalks

Part 5 –The City of Skyline ADA Transition Plan and Inventory

Skyline has an estimated population of 287. The city contains no sidewalks or pedestrian ramps in the public rights-of-way.

Part 6 – Blue Earth County ADA Transition Plan and Inventory

Blue Earth County has an estimated population of 69,280. The MAPO boundary contains only a portion of Blue Earth County including the cities of Mankato, Eagle Lake, and Skyline and surrounding townships. Blue Earth County opted to expand the Self-Evaluation and ADA Transition Plan processes to the rest of the County jurisdiction to take advantage of the process and build on the work already happening. Blue Earth County contains:

- 434 sidewalk and trail segments
- 835 pedestrian ramps.
- 90 traffic signal push buttons (maintained by the City of Mankato)
- 86 crosswalks

Part 7 – Nicollet County ADA Transition Plan and Inventory

Nicollet County has an estimated population of 34,332. The MAPO boundary contains only a portion of Nicollet County including the City of North Mankato, and surrounding townships. Nicollet County opted to expand the Self-Evaluation and ADA Transition Plan processes to the rest of the County jurisdiction to take advantage of the process and build on the work already happening. Nicollet County contains:

- 117 sidewalk and trail segments
- 173 pedestrian ramps.
- 32 crosswalks

This document has been created to allow MAPO and its partner agencies to meet Federal Highway Administration (FHWA) and Department of Justice (DOJ) requirements for ADA compliance to specifically cover accessibility within public rights-of-way and does not include information on agency programs, practices, or building facilities not related to public rights-of-way.

PUBLIC PARTICIPATION

Requirements

Under the 28 C.F.R Sec. 35.105 (b), “a public entity shall provide an opportunity to interested persons, including individuals with disabilities or organizations representing individuals with disabilities, to participate in the Self-Evaluation process by submitting comments.”

Additionally, the 28 C.F.R Sec. 35.105 (c) states “a public entity that employs 50 or more persons shall, for at least three years following completion of the Self- Evaluation, maintain on file and make available for public inspection:

1. A list of the interested persons consulted;
2. A description of areas examined and any problems identified; and
3. A description of any modifications made.

MAPO ADA Transition Plan and Inventory Activities

The MAPO and partner agencies have a desire to not only provide accessibility for all users but also to provide high quality infrastructure. Project staff met with the general public, area stakeholders, and agencies throughout the process. Public notice was also provided through various media. The following outlines public outreach that took place during this process:

- MAPO Conference Calls: MAPO and partner agencies met via monthly teleconference to coordinate for project management initiatives. There were eight conference calls through the duration of the project.
- Jurisdictional Policy Board Meetings: Project staff reported the results of each agency's Self-Evaluation to respective policy boards. This included presentations to city councils and county boards to ensure they were aware of barriers to accessibility in infrastructure, policies, and practices.
- Public Information Meetings: Two public information meetings were held in open house format to provide all interested citizens an opportunity to gain an understanding of the project and provide their feedback on barriers to accessibility in MAPO jurisdictions as well as facilities within Blue Earth County and Nicollet County outside of MAPO.
- Public Notice: Other methods for public outreach were also employed including:
 - Project Websites: A project website was developed for the MAPO including links to agency specific sites active through the duration of the project. Each site contained information on project status, project contacts, grievance procedures, and upcoming events. MAPO partner agencies included links to their respective project website on their agency site.
 - Public Notices: Project related events were advertised to the public through website updates, newspaper release, and social media notice. A news release was posted at the beginning of infrastructure data collection activities for each agency to make citizens aware.
- Appendix 1-A contains the following sections related to organizations contacted and public and stakeholder meeting summaries.
 - Appendix 1-A.1 – Public Outreach (Stakeholders) Contact List
 - Appendix 1-A.2 – Stakeholder Meeting Summaries
 - Appendix 1-A.3 – Public Information Meetings Summaries
- Agency Meetings: Project staff updated each City Council or County Board nearing the end of the project to updates to infrastructure and policy. This gave the City and County representatives a chance to ask questions and learn more about the project.

SELF-EVALUATION

Program Review - Infrastructure Data Collection

Overview

MAPO partner agencies are required, under Title II of the Americans with Disabilities Act (ADA) and 28 C.F.R. Sec. 35.105, to perform a Self-Evaluation of current transportation infrastructure policies, practices, and programs. A Self-Evaluation identifies what policies and practices impact accessibility and examine how the agency implements these policies. The goal of the Self-Evaluation is to verify that, in implementing the agency's policies and practices, the department is providing accessibility and not adversely affecting the full participation of individuals with disabilities.

The Self-Evaluation also examines the condition of the agency's Pedestrian Circulation Route/Pedestrian Access Route (PCR/PAR) and identifies potential need for PCR/PAR infrastructure improvements. This will include the sidewalks, curb ramps, bicycle/pedestrian trails, traffic control signals, and transit facilities that are located within the agency public rights-of-way. Any barriers to accessibility identified in the Self-Evaluation and actions to remedy identified barriers are set out in the agency specific transition plans in this document.

Methodology

The Self-Evaluation field data inventory was completed in Summer of 2018. During this time, project staff inventoried components of the PCR/PAR environment using the latest GPS technology to collect field data for pedestrian infrastructure features. Data was imported into Esri ArcGIS for analysis, reporting, and mapping as part of the Transition Plan. With this round of the project, any infrastructure constructed or refurbished since 2018 was updated in the Plan. Any grievances on previously-compliant ramps were also updated. This data is believed to be accurate as of 2023. ADA compliance criteria for the data inventory was based on MnDOT's standards and included a thorough quantitative and qualitative assessment of the following:

Pedestrian Ramps – All pedestrian ramps were inventoried and evaluated for compliance. Data collected for each pedestrian ramp includes condition, dome type, landing size, ramp type, slope, detectable warning system, and other required compliance information. Maintenance issues include vertical discontinuity, gaps, steep cross slope, cracking, standing water, vegetation, spalling, and others.

Ramps received one of the following condition ratings based on the above criteria:

- Uniform slopes, no noticeable cracks, no vertical discontinuities, no spalling, joints intact
- Uniform slopes, some cracks, vertical discontinuities less than 1/4", no spalling, joints intact
- Gutter slope beyond flare flows back towards curb ramp at < 1.5%, some large cracks and minor spalling, noticeable vertical discontinuities, joints beginning to deteriorate
- Gutter slope beyond flare flows back towards curb ramp at > 1.5%, many cracks, multi-directional, excessive spalling, excessive vertical discontinuities, joints badly deteriorated, > 1/2" vertical discontinuities

To achieve ADA-compliance, a pedestrian ramp must exhibit the following:

- Running slope is less than or equal to 8.33%
- Cross slope is less than or equal to 2%
- Presence of a landing area greater than or equal to 4-feet by 4-feet and less than or equal to 2% cross slopes in all directions.
- An ADA-compliant detectable warning is present (i.e. truncated domes)

Pedestrian ramps receiving a condition rating and/or not exhibiting the above criteria are not compliant with ADA and are candidates for future reconstruction projects. The timeline for modification of each of

these pedestrian ramps will depend on its priority ranking, correlation to planned projects, reasonable accommodation requests, and available funding. Pedestrian ramp replacement is anticipated to cost approximately \$5,000 per ramp which includes design and construction of one ramp. Compliant and non-compliant pedestrian ramp locations are identified in each agency's ADA Transition Plan.

Sidewalks and Trails – Sidewalk and trail maintenance issues include vertical discontinuity, gaps, steep cross slope, cracking, standing water, vegetation, spalling, and others. Barriers to accessibility include items obstructing the PAR which could include hydrants, lighting/traffic signal poles, power poles, manhole/handhole, gate valves, and locations with a narrowed PCR/PAR among others.

Sidewalks and trails received one of the following condition ratings based the above criteria:

- Sidewalk is smooth with no vertical discontinuities
- Sidewalk has vertical discontinuities less than 1/2 inch, and the surface is still passable
- Sidewalk has vertical discontinuities more than 1/2 inch
- Sidewalk is crumbling, has many cracks, and is unpassable for wheelchairs in many spots

To achieve ADA-compliance, a sidewalk or trail must exhibit the following:

- Slope is less than 8.34%
- Cross slope is less than or equal to 2%

Sidewalk and trail segments exhibiting condition ratings not exhibiting the above criteria are not compliant with ADA and are candidates for future reconstruction projects.

Crosswalks – Crosswalks were evaluated for their general condition. Marked crosswalk locations were assessed for marking visibility issues and general pavement condition.

Traffic Signals – Available pedestrian signals were inventoried for APS availability, walk signal availability or countdown timers, and push button location. Traffic signals were categorized as APS and Non-APS locations. Signals without APS were determined to be non-compliant.

Transit Stops and Shelters – Transit stops and shelters were inventoried for location and accessibility. Inventory included the type of stop (sign, shelter, bench, etc.), dimensions and slope of the boarding area (if present), connection to PAR, and general condition rating.

Transit stops received a condition rating based the above criteria. Transit stop condition ratings are as follows:

1. Landing surface is smooth with no vertical discontinuities
2. Landing surface has vertical discontinuities less than 1/2 inch, and the surface is still passable
3. Landing surface has vertical discontinuities more than 1/2 inch
4. Landing surface is crumbling, has many cracks, and may be unpassable for wheelchairs

The data collection template was built in an Esri ArcGIS geodatabase format to give flexibility needed to use a variety of software solutions, including Collector for ArcGIS or Trimble TerraSync. Data collection methodology included using a combination of existing data for ADA asset locations available from MAPO and its jurisdictions and GPS data collection. Each community within MAPO manages ADA-related information separately.

Review Timeframes

- Policy and infrastructure review was conducted throughout the Summer of 2023. Infrastructure that was updated during this timeframe may not be reflected in this Plan update.

Policy and Practices Review

MAPO partner agencies are required, under Title II of the ADA and 28 C.F.R Sec 35.105, to perform a Self-Evaluation of policies, practices, and programs. The goal of Self-Evaluation is to verify that, in implementing the policies and practices, agencies are providing accessibility and not adversely affecting the full participation of individuals with disabilities. The Self-Evaluation identifies policies and practices that affect accessibility and examine agency implementation of these policies. The Self-Evaluation examines the condition of the agency's PCR/PARs and identifies any existing infrastructure needs. Accessibility barriers identified in Self-Evaluations are provided in respective agency Transition Plans in subsequent parts of this document.

Practices

Each agency's Self-Evaluation examined practices to understand barriers to accessibility. As additional information was made available regarding methods of providing accessible pedestrian features, agencies updated their procedures to accommodate these methods.

Policy

A major goal for each MAPO partner is to continue to provide accessible pedestrian design features as part of their capital improvement projects. Agencies have established ADA design standards and procedures listed in their respective Transition Plans. These standards and procedures will be kept up to date with nationwide and local best management practices.

Maintenance of pedestrian facilities within the public rights-of-way will continue to follow the policies set forth by each agency. A breakdown of relevant policies can also be seen in each agency's transition plan.

IMPLEMENTATION

Priority Areas

High Priority

Locations exhibiting accessibility barriers identified through the public process by stakeholders and the general public.

Locations and roadway segments serving facilities including:

- Government facilities (city, county, state);
- Department of Motor Vehicles offices and License bureaus;
- Public libraries;
- Public and private primary and secondary schools (within a one-quarter mile radius from the school property);
- Hospitals, health clinics and health centers (public and private);
- Public housing and homeless shelters, including senior facilities and rehabilitation facilities;
- Colleges, universities, and technical schools;
- Transportation hubs (includes bus lines and transit stations);
- Parks

For these high priority locations and roadway segments, field collection staff measured a variety of detailed accessibility and pedestrian data, as described in Section III.

Medium Priority

Locations and roadway segments serving facilities including:

- Central business districts, shopping malls, supermarkets and strip retail centers;
- Churches and Places of Worship
- Major employment sites;
- Housing complexes, including apartments

For these medium priority locations and roadway segments, field collection staff measured a detailed variety of accessibility and pedestrian data.

Lower Priority

- Other areas not classified as High or Medium.

MAPO partner agencies can use the priority ranking outlined above to create the plan and schedule for integrating ADA compliance projects in future street projects.

The larger cities of North Mankato and Mankato have a large amount of non-compliance to plan and budget for and placed improvement projects in short-term, mid-term, and long-term projects. The smaller community of Eagle Lake has created an annual implementation plan in which they will achieve compliance within an 15-year timeframe. Blue Earth County and Nicollet County often have agreements with cities in their jurisdiction stating that cities are responsible for maintaining and improving all, or a portion of, pedestrian infrastructure on county facilities within their limits. This depends on the project and the level of ownership within the project area. The counties will work with each community in their jurisdiction to implement improvements identified in their respective transition plans.

External Agency Coordination

Many other agencies are responsible for pedestrian facilities within MAPO partner agency jurisdictions. MAPO partner agencies will coordinate with those agencies to track and assist in the facilitation of the elimination of accessibility barriers along their routes.

Implementation Schedule

Each agency will utilize two methods for upgrading pedestrian facilities to the current ADA standards. The first and most comprehensive of the two methods are the scheduled street and utility improvement projects. All pedestrian facilities impacted by these projects will be upgraded to current ADA accessibility standards. The second method is the stand alone sidewalk and ADA accessibility improvement project. These projects will be incorporated into the Capital Improvement Program (CIP) on a case by case basis as determined by agency staff.

Budget Information – Planning Level Costs

Construction costs for upgrading facilities can vary depending on each individual improvement and conditions of each site. Costs can also vary on the type and size of project the improvements are associated with. Listed below are representative 2023 costs for some typical accessibility improvements. These costs were used to generate planning level cost estimates for ADA improvement projects.

Unit Prices		
Description	Unit	Per Unit Cost
Pedestrian Ramp Construction	Corner Ramp	\$5,000
Traffic control signal APS upgrade retrofit	APS Equip.	\$19,000
Traffic control signal APS as part of new signal installation	APS Equip.	\$13,000
Sidewalk/Trail ADA improvement retrofit	Sq. Ft.	\$6.00
Bus Stop/Shelter ADA improvement retrofit	Bus Stop	\$5,000
Restripe a crosswalk	Crosswalk	\$100

Undue Financial Burden

Some ADA improvement projects can pose financial burdens on communities that are not justified. Consider the following example:

A portion of a sidewalk includes a driveway apron with a running slope exceeding 2% grade. The driveway apron running slope serves as the cross slope of the intersecting sidewalk which has a cross slope tolerance of <2% grade to maintain ADA compliance. The only option for achieving compliance is to purchase right-of-way from the adjacent property owner to remedy the issue.

Obtaining right-of-way is often controversial among property owners and can be cost prohibitive. While one or two instances of this may not pose a considerable financial burden, the burden is compounded when multiple instances occur and the costs add up. MAPO partner agencies plan to meet this challenge by ensuring future pedestrian infrastructure is constructed according to ADA standards from the start, ensuring the safety and accessibility of pedestrian infrastructure and avoiding future potential for undue financial burden.

Given the magnitude of non-compliance in the community, MAPO partner agencies feel the scheduling and prioritization set forth in this plan provides the most equitable, effective use of the each Agency's already constrained financial resources for bringing infrastructure into compliance. This includes performing what

would be stand-alone ADA improvement projects in larger, programmed projects in agency CIP's or STIP projects beginning with areas of high priority. Infrastructure deficiencies have been carefully prioritized in this process based on areas of high pedestrian traffic, input from the public, and condition of facilities. If instances of non-compliance pose a major threat to those using pedestrian facilities, MAPO partner agencies will remedy deficiencies immediately upon becoming aware of the issue. All decisions surrounding priority will be data-driven, defensible, and will ensure an objective process that is documented in writing has been performed as the basis for those decisions.

Under the 23 CFR 35.150(a)(3), if a public agency believes and can demonstrate that a requested action to make a facility accessible would result in a fundamental alteration in the nature of a service, program, or activity or in undue financial burden, "...a public agency has the burden of proving that compliance with §35.150(a) would result in such alteration or burdens. The decision that compliance would result in such alteration or burdens must be made by the head of a public entity or his or her designee after considering all resources available for use in the funding and operation of the service, program, or activity, and must be accompanied by a written statement of the reasons for reaching that conclusion..." (www.ecfr.gov).

ADA COORDINATOR

In accordance with 28 C.F.R Sec. 35.107(a), each agency has identified an ADA Title II Coordinator to oversee the agency's policies and procedures. Contact information for these individuals is located in respective agency ADA Transition Plans.

GRIEVANCE PROCEDURE

In accordance with 28 C.F.R Sec. 35.107(b), each MAPO partner agency has developed a grievance procedure for the purpose of the prompt and equitable resolution of citizen complaints, concerns, comments, and other grievances. A grievance procedure for each agency is outlined in their respective ADA Transition Plans along with a published draft of responsibilities in regards to the ADA.

MONITOR THE PROGRESS

MAPO will work with partner agencies to update this document as needed to reflect a unifying approach to complying with ADA and providing accessible pedestrian infrastructure. The appendices in each agency's ADA Transition Plan will be updated periodically to account for improvements, while the main body of the document will be updated within three to five years with a future update schedule to be developed at that time. With each main body update, a public comment period will be established to continue public outreach.

Appendix 1-A-1: Public Outreach Contact List

Public Outreach Contact List

Beyond the Project Management Team, engagement outreach was conducted with the following groups or locations:

- SMILES | 709 S Front St. #7 Mankato, MN 56001
- Greater Mankato Area United Way | 127 S 2nd St. #190. Mankato, MN 56001
- VINE Faith in Action | 421 East Hickory St. Mankato, MN 56001
- ARC Southwest Housing | 501 S 2nd St. Mankato, MN56001
- Different Drummer Dance | 501 S 2nd St. Mankato, MN56001
- Statewide Health Improvement Program (SHIP) | 410 S 5th St. Mankato, MN 56001
- Durham Apartments | 621 S 2nd St. Mankato, MN 56001
- Walnut Towers | 101 E Walnut St. Mankato, MN 56001
- Gus Johnson Plaza Apartments | 413 N 4th St. C Mankato, MN 56001
- Homestead Apartments | 140 Homestead Rd. Mankato, MN 56001

Appendix 1-A-2: Open House Meeting Summary

Public Open House Meeting

A public Open House was held at the Intergovernmental Building on September 26, 2023. Project staff from MAPO, Mankato, North Mankato, and Nicollet and Blue Earth Counties were available to discuss the project with attendees.

Project maps were printed on tables for attendees to view compliant and non-compliant infrastructure to identify gaps or missing data. An online version of the map was also available with Google Earth so attendees could compare to aerial imaging.

The Open House had about 15 attendees and received about 20 comments on the maps and online map.

Project flyers were available to take home and share. The project flyers contained a QR code to direct to the project website and online map.



Part 2 - City of Eagle Lake
ADA Transition Plan and Inventory

INTRODUCTION

The City of Eagle Lake is a partner agency of the Mankato/North Mankato Area Planning Organization (MAPO) and has completed a Self-Evaluation and developed an ADA Transition Plan as part of the overarching MAPO ADA Transition Plan effort. This “Part 2 – City of Eagle Lake ADA Transition Plan and Inventory” has been developed solely for the City of Eagle Lake and includes information, data, and recommendations relevant to the city’s interests and those of the MAPO. The City of Eagle Lake adopts “Part 1 – MAPO Partner Agency Requirements and Project Purpose” of the MAPO ADA Transition Plan and Inventory overarching document and associated appendices concurrent with the adoption of “Part 2 – City of Eagle Lake ADA Transition Plan and Inventory.”

This chapter accomplishes the following:

- Provides requirements mandated by ADA law for all agencies
- Introduces MAPO Partners
- Outlines public participation initiatives
- Provides the methodology used for agency Self-Evaluation
- Provides the methodology used for prioritization strategies for implementation.

PUBLIC OUTREACH

The following summarizes public outreach for the City of Eagle Lake:

- City Council Meetings: During in the process, project staff were asked to discuss project initiatives with the City of Eagle Lake City Council. Staff met with Council on November 6, 2023.
- Grievance Procedure: In compliance with 28 C.F.R. Sec. 35.107, the city has established the grievance procedure to receive future comments and concerns regarding barriers to accessibility. This can be seen in Appendix 2-E and is further detailed in Section VII below.
- Public Information Meetings: Project staff solicited feedback from the community on issues pertaining to ADA deficiencies within the community and initiatives for Transition Plan development while attending a public information meeting that took place on September 26, 2023. See Appendix 1-A for summaries of those meetings.
- City Website: This document was available for public comment online between the dates of September 26 and October 6, 2023.

Review of Programs

In 2023, the City of Eagle Lake conducted an inventory of pedestrian facilities within its public rights-of-way consisting of the following facilities:

- Pedestrian Ramps at city road crossings that include trail or sidewalk facilities.
- Crosswalks
- Sidewalks

There are 75 pedestrian ramps and 46 sidewalk segments within Eagle Lake right-of-way. Of the 75 pedestrian ramps, 23 are fully compliant. Of the 46 sidewalk segments, 37 are fully compliant.

City of Eagle Lake Self-Evaluation Infrastructure Data Collection Results		
Infrastructure Type	% Compliant	Summary
Pedestrian Ramps	31%	75 total pedestrian ramps 23 ramps are compliant
Sidewalks	80%	46 curb ramp segments total 37 segments are compliant.
Crosswalks	100%	8 crossings have marked crosswalks 100% of crossings evaluated are compliant

Review of Policies and Practices

Previous Practices

Since the adoption of the ADA, the City of Eagle Lake has striven to provide accessible pedestrian features as part of its construction. As additional information was made available as to the methods of providing accessible pedestrian features, Eagle Lake has updated their procedures to accommodate these methods. Recently, more standardized design and construction methods have evolved. The City of Eagle Lake has improved their understanding of available options and ability to assess the feasibility of implementing accessibility improvements through training on accessible features.

Policy

The City of Eagle Lake is committed to providing equal access to all its public programs, services, and activities for citizens with disabilities.

They will inspect, inventory, and plan for any required improvements to facilities located in its public rights-of-way, to ensure compliance with the ADA. The goal is to continue to provide accessible pedestrian design features as part of all construction projects. The City has established ADA design standards and procedures. These standards and procedures will be kept up to date with nationwide and local best management practices.

The City will coordinate with other agencies as necessary to ensure that all new or altered facilities within City jurisdiction are ADA compliant to the maximum extent feasible.

Maintenance of pedestrian facilities within the organization's public rights-of-way will continue to follow these policies and practices. In general, the cities are responsible for snow removal operations for pedestrian facilities along city roadways within the city.

The City will consider and respond to all accessibility improvement requests. Requests should be sent to the ADA Coordinator. All accessibility improvements that have been deemed reasonable will be scheduled consistent with City construction priorities.

IMPLEMENTATION PLAN

Priority Areas

The City of Eagle Lake identified specific locations as priority areas for planned accessibility improvement projects based on criteria identified in Part 1-Section IV. These areas have been selected due to their proximity to specific land uses consistent with higher levels of pedestrian traffic, from the receipt of public comments, as well as areas exhibiting high levels of non-compliance. The priority areas as identified in the 2023 Self-Evaluation will be programmed into Eagle Lake's CIP as project needs arise and/or public preference dictates. Additional priority will be given to any location where an improvement project or alteration was constructed after January 26, 1991, and accessibility features were omitted.

External Agency Coordination

Many other agencies are responsible for pedestrian facilities within the jurisdiction of the City of Eagle Lake. The city will coordinate with those agencies to track and assist in the facilitation of the elimination of accessibility barriers along their routes.

Schedule

The City of Eagle Lake will utilize two methods for upgrading pedestrian facilities to the current ADA standards. The first and most comprehensive of the two methods are the scheduled street and utility improvement projects. All pedestrian facilities impacted by these projects will be upgraded to current ADA accessibility standards. The second method is the stand alone sidewalk and ADA accessibility improvement project. These projects will be pursued by the City of Eagle Lake staff as they appear in the implementation plan in Appendix 2-A.

Each year the City of Eagle Lake will plan to allocate approximately \$35,000 to improving pedestrian infrastructure deficiencies identified in this plan. The city has set the following schedule goals for improving the accessibility of its pedestrian facilities within the city's jurisdiction:

- After 15 years, 100% of accessibility features identified in this plan would be ADA compliant.

Improvements will be coordinated with the city's annual budget and its long-term maintenance effort.

ADA COORDINATOR

In accordance with 28 C.F.R Sec. 35.107(a), the City of Eagle Lake has identified an ADA Title II Coordinator to oversee the city's policies and procedures. Contact information for this individual is located in Appendix 2-F.

GRIEVANCE PROCEDURE

Under the Americans with Disabilities Act, each agency is required to publish its

responsibilities in regards to the ADA. If users of The City of Eagle Lake facilities and services believe the city has not provided reasonable accommodation, they have the right to file a grievance.

In accordance with 28 C.F.R. Sec. 35.107(b), the city has developed a grievance procedure for the purpose of the prompt and equitable resolution of citizens' complaints, concerns, comments, and other grievances. This draft of the public notice and the City of Eagle Lake's grievance procedure is outlined in Appendix 2-E.

MONITOR THE PROGRESS

This document will be updated as needed to reflect the City of Eagle Lake's approach to complying with ADA and providing accessible pedestrian infrastructure. The appendices in this document will be updated periodically to account for improvements , while the main body of the document will be updated within five years with a future update schedule to be developed at that time. With each main body update, a public comment period will be established to continue the public outreach.

Appendix 2-A: Self-Evaluation - Program Review

Appendix 2-A: City of Eagle Lake, MN Self-Evaluation – Program Review

Review of Programs

During Summer of 2023, the City of Eagle Lake inventoried pedestrian ramps and sidewalks within the public rights-of-way.

Pedestrian Ramps

The City of Eagle Lake has 75 locations where pedestrian ramps exist or should exist within its public rights-of-way. These locations were inventoried for ADA compliance based on (1) whether a pedestrian ramp was present and (2) if compliance criteria outlined in Part 1 Sec. III were met. 23 (31%) of the 75 locations were reported to be compliant. Planning level remediation costs for pedestrian ramps are aggregated to street intersections and are identified in Table 2-A.3.

Sidewalks/Trails

The sidewalks and trails within the City of Eagle Lake public rights-of-way were inventoried and evaluated to determine existing compliance with ADA and to identify existing obstructions based on compliance criteria outlined in Part 1. Of the 46 sidewalk segments evaluated, 37 (80%) were reported to be compliant. Planning level remediation costs for sidewalks and barriers are included in Table 2-A.4.

Crosswalks

Eight crosswalks were evaluated in the City of Eagle Lake. All were marked appropriately and were in acceptable condition.

Public Comment

No comments specific to Eagle Lake were received.

Compliant and non-compliant pedestrian ramps, sidewalk, and trail infrastructure are illustrated on the following page. Remediation is dependent upon priority ranking, correlation to planned projects, reasonable accommodation requests, and available funding. A detailed list of these instances may be obtained upon request to the City of Eagle Lake ADA Coordinator (Appendix 2-F).

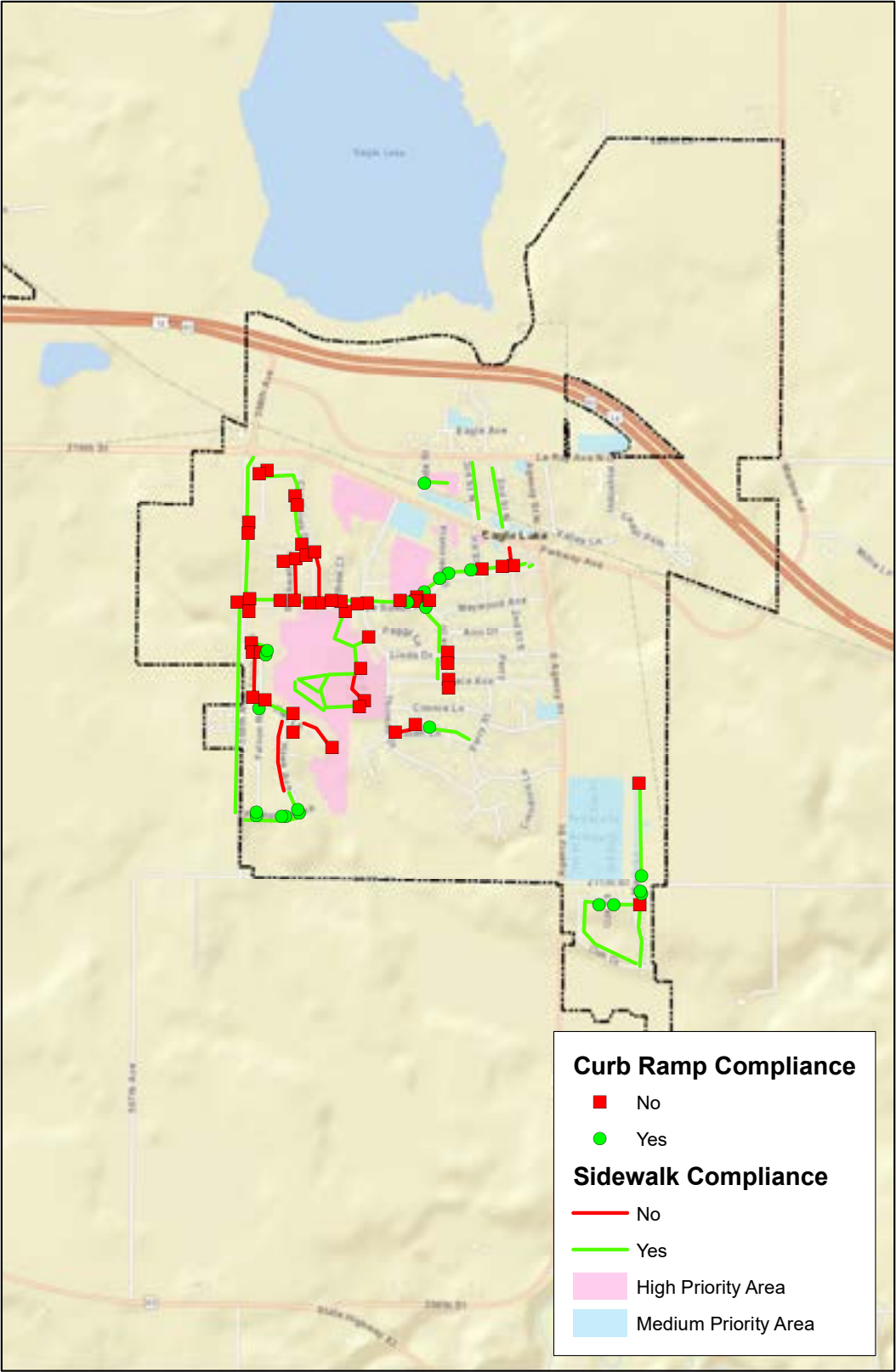
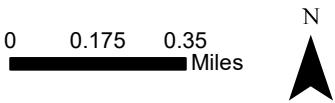


Figure EL



Appendix 2-B: Self-Evaluation - Policy and Practice Review

Appendix 2-B: Self-Evaluation – Policy and Practice Review

Review of Policies and Practices

The City’s policies and practices include any City, department, or division policies and practices that direct staff in its daily work activities. Policies and practices that relate to accessibility and ADA conformance include:

The City of Eagle Lake City Code:

The City of Eagle Lake City Code provides several provisions dealing with sidewalk infrastructure. The following is a list of regulations providing barriers to ADA compliance:

Chapter 4: Regulations of streets, highways, and other rights-of-ways.

This section states the following:

“It is unlawful for any person, as driver or operator of a vehicle, or as the registered owner of a vehicle to park, stop or leave standing, whether knowingly or unknowingly, any such vehicle in a given place upon any public street for a period in excess of seventy two (72) continuous hours. (04-07-2014)”

A. Upon a public sidewalk;

E. Upon any public street on any crosswalk;

Policy Understanding and Recommended Revision:

Based on this regulation, it is unlawful to park, stop, or leave standing a vehicle on a public sidewalk or crosswalk for 72 hours or less which provides a temporary barrier to all users of those pedestrian facilities.

The following revisions to this Plan are recommended as part of this review:

1. Amend policy language to prevent parking, stopping, or leaving a vehicle on sidewalks or crosswalks for any length of time unless for temporary unloading or emergency purposes.

Appendix 2-C: ADA Transition Plan Projects referenced from the City of Eagle Lake Capital Improvements Plan

Capital Improvements Plan (CIP) Projects That Include Accessible Pedestrian Infrastructure

The City of Eagle Lake's currently has no Capital Improvement Plan (CIP). The City will continue to implement infrastructure and maintenance improvements as part of street projects and its pavement management plan. With these efforts, the City will incorporate ADA-compliant pedestrian facilities and complete accessible infrastructure improvements as needed to ensure access for all users.

Appendix 2-D: Public Outreach Results

Public Outreach Results

Input from the community has been gathered and used to help define priority areas for improvements within the public rights-of-way of the City of Eagle Lake.

Public outreach for the creation of this document consisted of the following activities:

Public Open House

MAPO agencies held one public open house to gather input on the state of pedestrian infrastructure in each jurisdiction and priority preferences for projects moving forward.

All stakeholders within MAPO jurisdictions were invited to attend a public information meeting on September 26, 2023. at the Mankato Intergovernmental Center to receive information on the project and provide their feedback on the process and help project staff identify locations that pose barriers to accessibility. There were no specific comments received for Eagle Lake at that meeting.

Project Website

A grievance procedure was also available on the site in which the general public could file an electronic grievance, placing comments directly on an interactive map for the city to include in the results of the Self-Evaluation. There were no comments received through this application.

Appendix 2-E: Grievance Procedure

ADA Grievance Procedure

In accordance with 28 CFR 35.107(b), the City has developed the following ADA grievance procedure for the purpose of the prompt and equitable resolution of citizens' complaints, concerns, comments, and other grievances.

The City understands that members of the public may desire to contact staff to discuss ADA issues without filing a formal grievance. Members of the public wishing to contact the ADA Coordinator should reference the contact information in Appendix 2-F. Contacting staff to informally discuss ADA issues is welcome and does not limit a person's ability or right to file a formal grievance later.

Those wishing to file a formal written grievance with the City of Eagle Lake may do so by one of the following methods:

Telephone

Contact the City of Eagle Lake's ADA Coordinator listed in the Contact Information section of Appendix 2-F to submit an oral grievance. The staff person will use the internet to electronically submit the grievance on behalf of the person filing it.

Paper Submission

A paper copy of the City's grievance form is available by request from the City of Eagle Lake's ADA Coordinator (contact information in Appendix 2-F). Complete the form and submit it to the City of Eagle Lake ADA Coordinator at the address listed.

The City of will acknowledge receipt of the grievance to the citizen within 10 working days of the submission. City staff will then provide a response or resolution to the grievance or will provide information on when the citizen can expect a response. If the grievance filed does not fall within the City of Eagle Lake's jurisdiction, staff will work with the citizen to contact the agency with jurisdiction.

When possible (typically within 60 calendar days or less of the grievance submission) City staff will conduct an investigation to determine the validity of the alleged violation. As a part of the investigation, internal staff will be consulted to fully understand the complaint and possible solutions. The City of Eagle Lake staff will contact the citizen to discuss the investigation and proposed resolution.

The City of Eagle Lake will consider all grievances within its particular context or setting. Furthermore, the department will consider many varying circumstances including: access to applicable services, programs, or facilities; the nature of the disability; essential eligibility requirements for participation; health and safety of others; and degree to which a potential solution would constitute a fundamental alteration to the program, service, or facility, or cause undue hardship to the City of Eagle Lake.

Accordingly, the resolution by The City of Eagle Lake of any one grievance does not constitute a precedent upon which the City is bound or upon which other complaining parties may rely.

Complaints of Title II violations may be filed with the Department of Justice (DOJ) within 180 days of the date of discrimination. In certain situations, cases may be referred to a mediation program sponsored by the DOJ. The DOJ may bring a lawsuit where it has investigated a matter and has been unable to resolve violations.

For more information, contact:

U.S. Department of Justice, Civil Rights Division
950 Pennsylvania Avenue, N.W. Disability Rights Section – NYAV
Washington, D.C. 20530 www.ada.gov
(800) 514-0301 (voice)
(800) 514-0383 (TTY)

Title II may also be enforced through private lawsuits in Federal court. It is not necessary to file a complaint with the DOJ or any other Federal agency, or to receive a “right-to-sue” letter, before going to court.

File Retention

The City of Eagle Lake shall maintain ADA grievance files on behalf of the City for a period of seven years.

City of Eagle Lake, MN Grievance Form

Instructions: Please fill out this form completely and submit to:

City of Eagle Lake ADA Coordinator
City of Eagle Lake, MN
705 Parkway Avenue
Eagle Lake, MN 56024

Or it can be emailed to the ADA coordinator at jbromeland@eaglelakemn.com

Complainant - person filing grievance:

Name: _____ Date: _____

Address: _____ City, State, Zip Code: _____

Home: _____ Cell: _____

Work: _____ Email: _____

Representing - person claiming an accessibility issue or alleging an ADA violation (if not the complainant):

Name: _____ Date: _____

Address: _____ City, State, Zip Code: _____

Home: _____ Cell: _____

Work: _____ Email: _____

Description and location of the alleged violation and the nature of a remedy sought.

If the complainant has filed the same complaint or grievance with the United States Department of Justice (DOJ), another federal or state civil rights agency, a court, or others, the **name of the agency or court where the complainant filed it and the filing date**.

Agency or Court: _____ Contact Person: _____

Address: _____ City, State, Zip Code: _____

Phone Number: _____ Date Filed: _____

Appendix 2-F: Contact Information

Responsible Officials and Key Staff

Responsible Officials Contact Information

City of Eagle Lake ADA Coordinator:

Jennifer Bromeland, City Administrator
705 Parkway Avenue
Eagle Lake, MN 56024
P: (507)257-3218
E: jbromeland@eaglelakemn.com

Appendix 2-G: ADA Design Standards and Procedures

ADA Design Standards and Procedures

Design Standards

Public Rights-of-Way Accessibility Guidelines

Public Rights-of-Way Accessibility Guidelines (PROWAG), developed by the Access Board, are draft guidelines that address accessibility in the public rights-of-way. Sidewalks, street crossings, and other elements of the public rights-of-way present unique challenges to accessibility for which specific guidance is considered essential. The Access Board is developing these guidelines that will address various issues, including access for visually impaired pedestrians at street crossings, wheelchair access to on-street parking, and various constraints posed by space limitations, roadway design practices, slope, and terrain. PROWAG can be found at <http://www.access-board.gov/attachments/article/743/nprm.pdf>.

In 2010 and 2015, as a part of the development of MnDOT's Transition Plan, MnDOT Issued Technical Memorandum 10-02-TR-01 Adoption of Public Rights of way Accessibility Guidance and Technical Memorandum No. 15--02-TR-01 Adoption of Public Rights-of -Way Accessibility Guidance (PROWAG), respectively to their staff, cities, and counties. These memorandums, which have both expired, make the PROWAG the primary guidance for accessible facility design on MnDOT projects. In addition, these technical memorandums can be found on MnDOT's website. See (<http://techmemos.dot.state.mn.us/>).

Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way

The Access Board is proposing these accessibility guidelines for the design, construction, and alteration of pedestrian facilities in the public right-of-way. The guidelines ensure that sidewalks, pedestrian street crossings, pedestrian signals, and other facilities for pedestrian circulation and use constructed or altered in the public right-of-way by state and local governments are readily accessible for pedestrians with disabilities. When the guidelines are adopted, with or without additions and modifications, as accessibility standards in regulations issued by other federal agencies implementing the ADA, Section 504 of the Rehabilitation Act, and the Architectural Barriers Act, compliance with these accessibility standards is mandatory. These proposed accessibility guidelines can be found on the Access Board website (<http://www.access-board.gov>) under Public Rights-of-Way or at <http://www.access-board.gov/attachments/article/743/nprm.pdf>.

Accessible Public Rights-of-Way Planning and Design for Alterations (August 2007)

This report and its recommendations are the work of the Public Rights-of-Way Access Advisory Committee (PROWAAC) – Subcommittee on Technical Assistance and are intended to provide technical assistance only. The report is not a rule and has no legal effect. It has not been endorsed by the U.S. Access Board, the Department of Justice, or the Federal Highway Administration of the Department of Transportation. Still it can be a technical advisory source for engineers and technicians who are planning and designing for alterations to pedestrian elements. This document is on the Access Board website (<http://www.access-board.gov>) or at <http://www.access-board.gov/attachments/article/756/guide.pdf>.

Minnesota Department of Transportation

Building on the adoption of PROWAG as planning and design guidance for accessible pedestrian facilities, MnDOT has developed additional planning, design, and construction guidance that is available to local agencies. Listed below is information on additional design guidance available. This is not intended to be an exclusive or comprehensive list of ADA guidance, but rather an acknowledgement of guidance staff should consider and a starting point for information on providing accessible pedestrian facilities.

The MnDOT Accessibility webpage, which has good information in a variety of subject areas related to ADA and accessibility, can be found at <http://www.dot.state.mn.us/ada/index.html>. The webpage also provides the ability to sign up for ADA policy and design training classes when available and to review material from

previous trainings.

Curb Ramp Guidelines: <http://www.dot.state.mn.us/ada/pdf/curbramp.pdf>

ADA Project Design Guide Memo: <http://www.dot.state.mn.us/ada/pdf/adaprojectdesignguidememo.pdf> ADA Project Design Guide: <http://www.dot.state.mn.us/ada/pdf/adaprojectdesignguide.pdf>

Pedestrian Curb Ramp Details Standard Plans 5-297.250 can be found on MnDOT's website at <http://standardplans.dot.state.mn.us/>

Driveway and Sidewalk Details Standard Plans 5-297.254 can be found on MnDOT's website at <http://standardplans.dot.state.mn.us/>

MnDOT's 7000 series Standard Plates, which are approved standards drawings, provide information on standard details of construction and materials related to curbs, gutters, and sidewalks are on MnDOT's website at <http://standardplates.dot.state.mn.us/stdplate.aspx>

The MnDOT Facility Design Guide serves as a uniform design guide for engineers and technicians working on MnDOT projects. The document is available to others (such as Hennepin County) as a technical resource. Chapter 11 – Special Designs, includes information on the design of pedestrian facilities. The Road Design Manual can be found at (<http://roaddesign.dot.state.mn.us/roaddesign.aspx>)

MnDOT's Pedestrian Accommodations Through Work Zones webpage, <http://www.dot.state.mn.us/trafficeng/workzone/apr.html> contains information on providing accessibility during impacts due to maintenance or construction activities.

Design Procedures

Intersection Corners

The City of Eagle Lake will attempt to construct or upgrade pedestrian curb ramps to be consistent with Access Board recommended designs parameters and MnDOT ADA design guidance and procedures to the extent feasible within all capital reconstruction projects. There may be limitations which make it technically infeasible for the City to achieve these goals at an intersection corner within the scope of any project. Those limitations will be noted and the intersection corners will be constructed to maximize accessibility to the extent feasible within the project scope. As future projects or opportunities arise, additional improvements at these locations may be incorporated into future projects. The City will strive to ensure that each intersection corner is constructed to be as accessible as possible.

Sidewalks / Trails

The City of Eagle Lake will attempt to construct or upgrade sidewalks and trails to be consistent with Access Board recommended designs parameters, MnDOT ADA design guidance and procedures to the extent feasible within all capital improvement projects. There may be limitations which make it technically infeasible for the City to achieve these goals within all segments of sidewalks or trails within the scope of any project. Those limitations will be noted and those segments will be constructed to maximize accessibility to the extent feasible within the project scope. As future projects or opportunities arise, additional improvements at these locations may be incorporated into future projects. The City will strive to ensure that every sidewalk or trail is constructed to be as accessible as possible.

An aerial photograph of Mankato, Minnesota. The foreground shows a wide river with a concrete bridge crossing it. To the right of the bridge, a multi-lane highway curves through a green landscape. In the background, a city skyline is visible, including several large buildings and a stadium. The city is surrounded by dense green trees and hills.

Part 3 - City of Mankato ADA Transition Plan and Inventory

INTRODUCTION

The City of Mankato is a partner agency of the Mankato/North Mankato Area Planning Organization (MAPO) and has completed a Self-Evaluation and developed an ADA Transition Plan as part of the overarching MAPO ADA Transition Plan effort. This “Part 3 – City of Mankato ADA Transition Plan and Inventory” has been developed solely for the City of Mankato and includes information, data, and recommendations relevant to the city’s interests and those of the MAPO. The City of Mankato adopts “Part 1 – MAPO Partner Agency Requirements and Project Purpose” of the MAPO ADA Transition Plan and Inventory overarching document and associated appendices concurrent with the adoption of “Part 3 – City of Mankato ADA Transition Plan and Inventory.”

This chapter accomplishes the following:

- Provides requirements mandated by ADA law for all agencies
- Introduces MAPO Partners
- Outlines public participation initiatives
- Provides the methodology used for agency Self-Evaluation
- Provides the methodology used for prioritization strategies for implementation.

PUBLIC OUTREACH

The following summarizes public outreach for the City of Mankato:

- City Council Meetings: During in the process, project staff were asked to discuss project initiatives with the City of Mankato City Council. Staff met with Council on October 23, 2023.
- Grievance Procedure: In compliance with 28 C.F.R. Sec. 35.107, the city has established the grievance procedure to receive future comments and concerns regarding barriers to accessibility. This can be seen in Appendix 2-E and is further detailed in Section VII below.
- Public Information Meetings: Project staff solicited feedback from the community on issues pertaining to ADA deficiencies within the community and initiatives for Transition Plan development while attending a public information meeting that took place on September 23, 2023. See Appendix 1-A for summaries of those meetings.
- City Website: A summary of comments received and detailed information regarding the public outreach activities are located in Appendix 2- D.

Review of Programs

In 2023, the City of Mankato conducted an inventory of pedestrian facilities within its public rights-of-way consisting of the following facilities:

- Pedestrian Ramps at city road crossings that include trail or sidewalk facilities.
- Crosswalks
- Sidewalks
- Bus Stops
- Pedestrian Signals
- Crosswalks

There are 3092 pedestrian ramps and 1951 sidewalk segments within Mankato right-of-way. Of the 3092 pedestrian ramps, 2059 are fully compliant. Of the 1951 sidewalk segments, 1791 are fully compliant.

City of Mankato Self-Evaluation Infrastructure Data Collection Results		
Infrastructure Type	% Compliant	Summary
Pedestrian Ramps	67%	3092 total pedestrian ramps 2059 (67%) are compliant
Sidewalks	92%	1951 Sidewalk segments 1791 segments of sidewalk/trail (92%) are compliant
Crosswalks	94%	527 crossings have marked crosswalks 94% of crossings evaluated are compliant
Bus Stops	7%	86 total bus stops 58 were evaluated 6 are compliant 52 were non-compliant
Pedestrian Signals	61%	287 total signals were evaluated 175 (61%) are accessible
Crosswalks	94%	527 crosswalks were evaluated 496 (94%) were compliant
Railroad crossings	0%	5 crossings were evaluated None were compliant

Review of Policies and Practices

Previous Practices

Since the adoption of the ADA, the City of Mankato has striven to provide accessible pedestrian features as part of street construction and reconstruction projects. As additional information was made available as to the methods of providing accessible pedestrian features, the City updated their procedures to accommodate these methods.

Policy

The City of Mankato's goal is to continue to provide accessible pedestrian design features as part of street construction and reconstruction projects. The City will reference ADA design standards and procedures listed in Appendix 3- G . These standards and procedures provide the preferred standard for ADA compliance in Minnesota and will serve as the primary guidance for all future projects.

The City will consider and respond to all accessibility improvement requests. All accessibility improvements that have been deemed reasonable will be scheduled consistent with transportation priorities. The City will coordinate with external agencies to ensure that all new or altered pedestrian facilities within the City's jurisdiction are ADA compliant to the maximum extent feasible. Requests for accessibility improvements can be submitted to the City of Mankato's ADA Coordinator.

IMPLEMENTATION PLAN

Priority Areas

The City of Mankato identified specific locations as priority areas for planned accessibility improvement projects based on criteria identified in Part 1-Section IV. These areas have been selected due to their proximity to specific land uses consistent with higher levels of pedestrian traffic, from the receipt of public comments, as well as areas exhibiting high levels of non-compliance. The priority areas as identified in the 2023 Self-Evaluation will be programmed into Mankato's CIP as project needs arise and/or public preference dictates. Additional priority will be given to any location where an improvement project or alteration was constructed after January 26, 1991, and accessibility features were omitted.

External Agency Coordination

Many other agencies are responsible for pedestrian facilities within the jurisdiction of the City of Mankato. The City will coordinate with those agencies to track and assist in the facilitation of the elimination of accessibility barriers along their routes.

Schedule

The City of Mankato will utilize two methods for upgrading pedestrian facilities to the current ADA standards. The first and most comprehensive of the two methods are the scheduled street and utility improvement projects. All pedestrian facilities impacted by these projects will be upgraded to current ADA accessibility standards. The second method is the stand alone sidewalk and ADA accessibility improvement project. These projects will be incorporated into the Community Investment Program (CIP) on a case by case basis as determined by the City of Mankato staff. The City CIP, which includes a detailed schedule and budget for specific improvements, is included in Appendix 3-C.

The City anticipates allocating approximately \$220,000 per year toward ADA improvements identified in Appendix 3-A. This figure represents a rough estimate of annual funds the City of Mankato anticipates to allocate to pedestrian infrastructure through dedicated funds and street projects identified in the Community Investment Plan (CIP). For example, the City may dedicate \$40,000 - \$50,000 through the annual budget specifically for pedestrian infrastructure while another \$160,000 or \$170,000 is allocated through street projects identified in the CIP and/or the State Transportation Improvement Program (STIP).

Improvements have been identified as short-term improvements (2019-2028), mid-term improvements (2029-2038), and long-term improvements (2039 and later) for implementation based on the previously described prioritization process and annual budget constraints. The City anticipates the following implementation benchmarks:

- After 10 years, 29% of accessibility features identified in this plan would be ADA compliant. Including the highest priority locations.
- After 20 years, 55% of accessibility features identified in this plan would be ADA compliant.
- After 30 years, 82% of accessibility features identified in this plan would be ADA compliant.
- After 40 years, 100% of accessibility features identified in this plan would be ADA compliant.

Improvements will be coordinated with the City's annual budget, CIP, and long-term maintenance effort.

ADA COORDINATOR

In accordance with 28 C.F.R Sec. 35.107(a), the City of Mankato has identified an ADA Title II Coordinator to oversee the City's policies and procedures. Contact information for this individual is located in Appendix 3-F.

GRIEVANCE PROCEDURE

Under the Americans with Disabilities Act, each agency is required to publish its responsibilities in regards to the ADA. If users of The City of Mankato facilities and services believe the City has not provided reasonable accommodation, they have the right to file a grievance.

In accordance with 28 C.F.R. Sec. 35.107(b), the City has developed a grievance procedure for the purpose of the prompt and equitable resolution of citizens' complaints, concerns, comments, and other grievances. This draft of the public notice and the City of Mankato's grievance procedure is outlined in Appendix 3-E.

MONITOR THE PROGRESS

This document will be updated as needed to reflect the City of Mankato's approach to complying with ADA and providing accessible pedestrian infrastructure. The appendices in this document will be updated periodically to account for improvements, while the main body of the document will be updated every five years with a future update schedule to be developed at that time. With each main body update, a public comment period will be established to continue the public outreach. The City plans to align updates to this ADA Transition Plan with the recurring update to the MAPO Long Range Transportation Plan in order to sync recommended roadway improvement projects through those two efforts. This allows the City to avoid having conflicting planning tools for implementing street projects in the future.

Appendix 3-A: Self-Evaluation - Program Review

Appendix 3-A: MN Self-Evaluation – Program Review

Review of Programs

During Summer of 2023, the City of Mankato inventoried pedestrian ramps and sidewalks within the public rights-of-way.

Pedestrian Ramps

The City of Mankato has 3092 locations where pedestrian ramps exist or should exist within its public rights-of-way. These locations were inventoried for ADA compliance based on (1) whether a pedestrian ramp was present and (2) if compliance criteria outlined in Part 1 Sec. III were met. 2059 (67%) of the locations were reported to be compliant.

Sidewalks/Trails

The sidewalks and trails within the City of Mankato public rights-of-way were inventoried and evaluated to determine existing compliance with ADA and to identify existing obstructions based on compliance criteria outlined in Part 1. Of the 1951 sidewalk segments evaluated, 1791 (92%) were reported to be compliant. Planning level remediation costs for sidewalks and barriers are included in Table 3-A.4.

Public Comment

Below are the comments received that were relevant to the City of Mankato:

- The intersection of S Victory Drive and E Main Street (NE)- the curb cut at this intersection makes turning the corner to follow the trail when crossing E Main Street challenging. The push button is also difficult to access.
- The intersection of S Victory Drive and E Main Street (SW)- The electrical box in this location makes access to the push button and trail access difficult to navigate. Most users have created a cut through that is easier to navigate.
- Madison Avenue and Swiss Street (SW) - This curb cut and the push button make it difficult to navigate. I have seen most mobility users use the street rather than the sidewalk at this intersection.
- Sidewalk along Knollcrest Drive - Short sidewalk section to nowhere.
- Johnson Street and Adams Street (SW) - There is no curb cut on the sidewalk opposite of this curb cut. Have to go to the driveway up the street a little ways in order to get on the sidewalk that goes down the hill at this location. Sidewalk along this stretch is right up against the street which makes it uncomfortable for users as speeds have increased along Adams Street.
- Pedestrian crossing at Mayo Health - Crosswalk timing is not long enough and cars are not stopping. Lower the signage so they see it. Make it more high visibility.
- Liberty Street - Sidewalks are hard to see.
- Durham Apartments - High-priority for accessible residents here.
- Image of high visibility crosswalks - This is a cross walk proper marking. Light to cross should be 24 seconds. Not 19 or 16. It needs to be consistent and proper please. All corners at Victory to Lower Mankato.
- Keep bike lane clear in winter so we can use it to get around.
- 1964 Americans with disabilities. This needs to be updated nationwide.
- The sidewalks on 4th street between Main Street and Vine are sinking.
- Sidewalks are awful east of the Madison Event Center.
- I can't access the farmers market by wheelchair.
- Madison to St. Andrews trail has large gaps.
- There should be sidewalks on Apache Place.
- Adams and Teton has no crosswalk.

Compliant and non-compliant pedestrian infrastructure is illustrated in the following pages. The timeline for replacement of these sidewalks will depend on priority ranking, correlation to planned projects, reasonable accommodation requests, and available funding. A detailed list of these instances may be obtained upon request to the City of Mankato ADA Coordinator (Appendix 3-F).

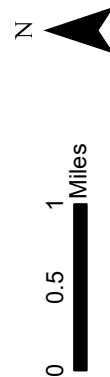
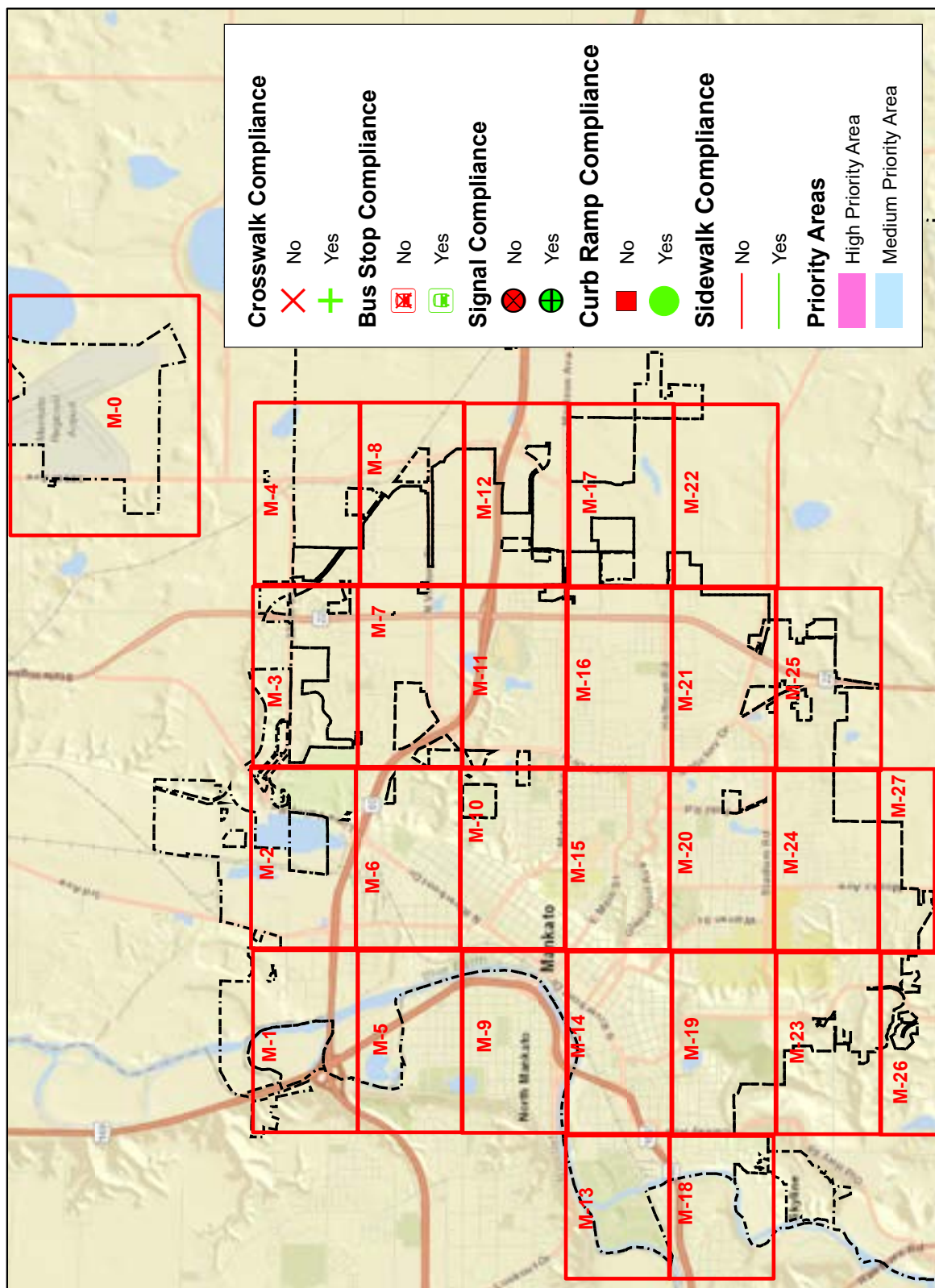


Figure M

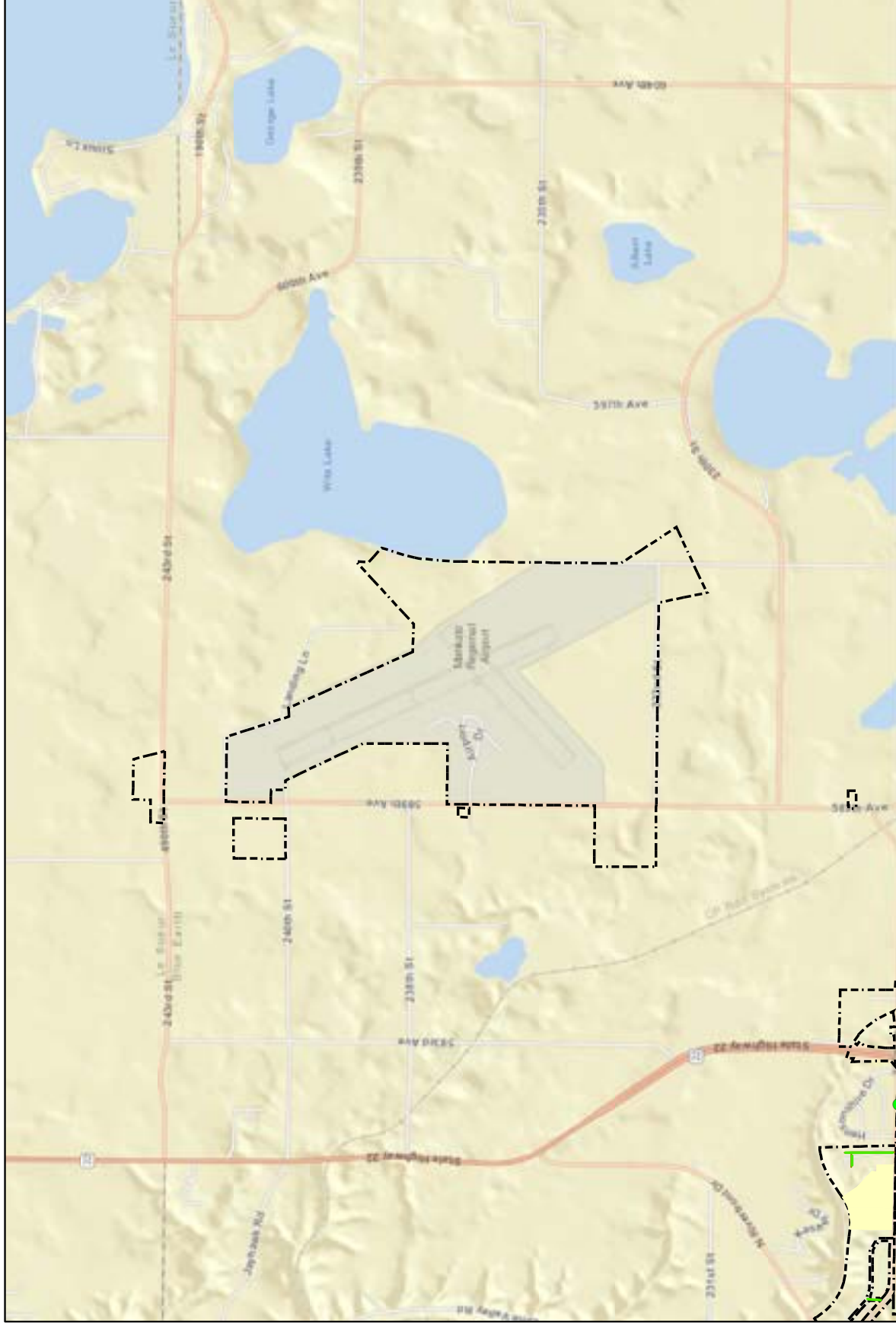


Figure M0

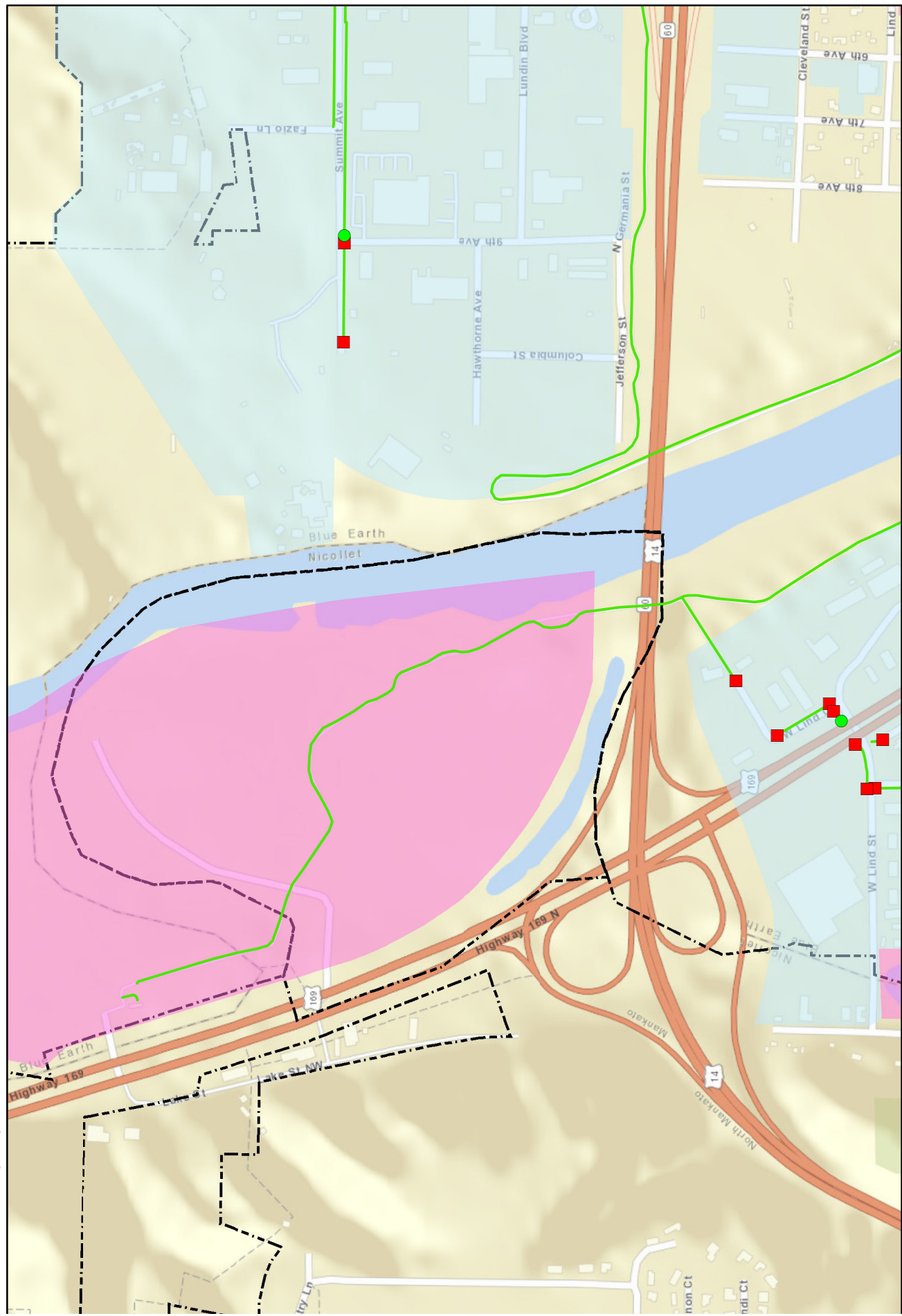


Figure M1

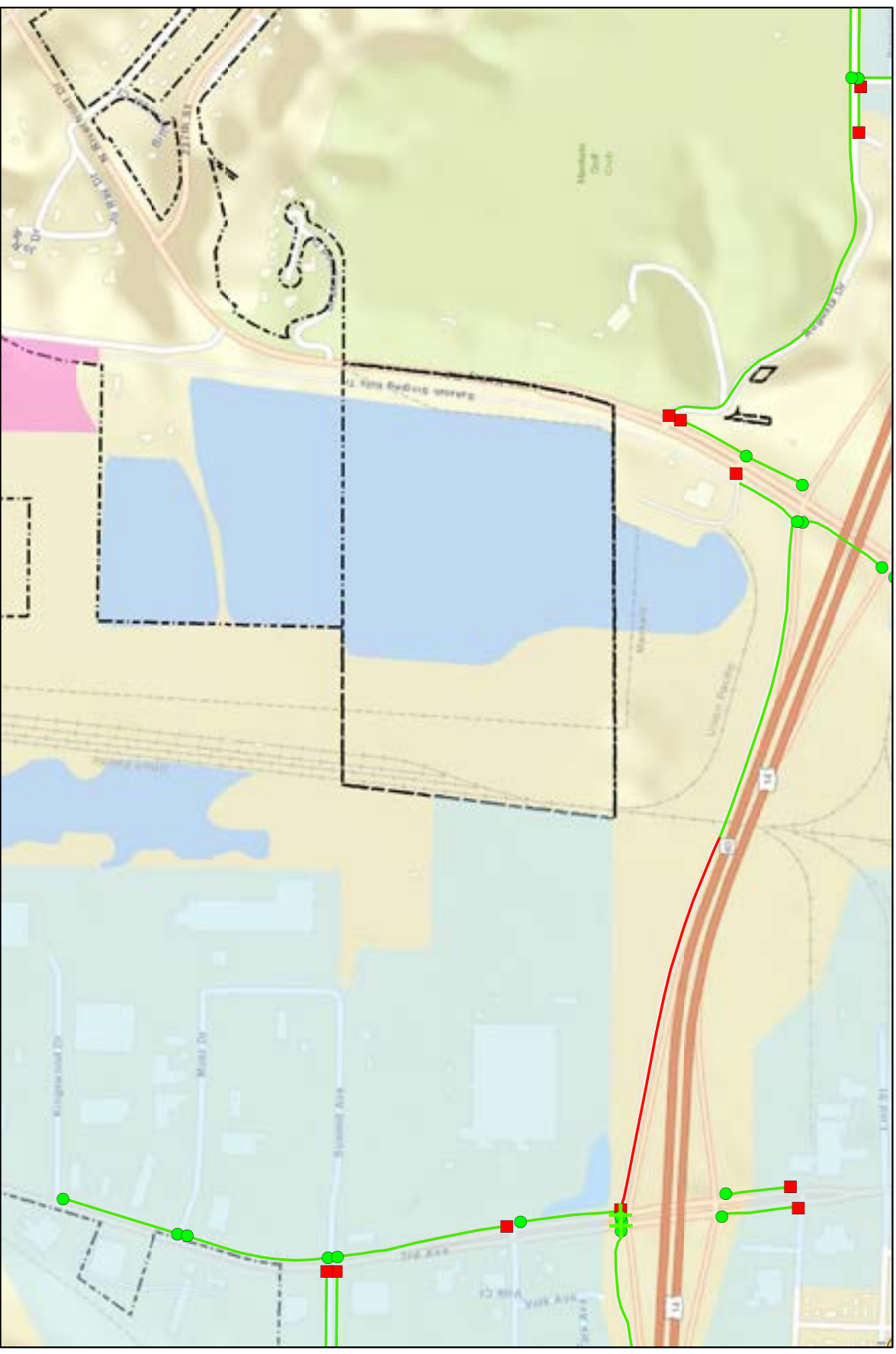
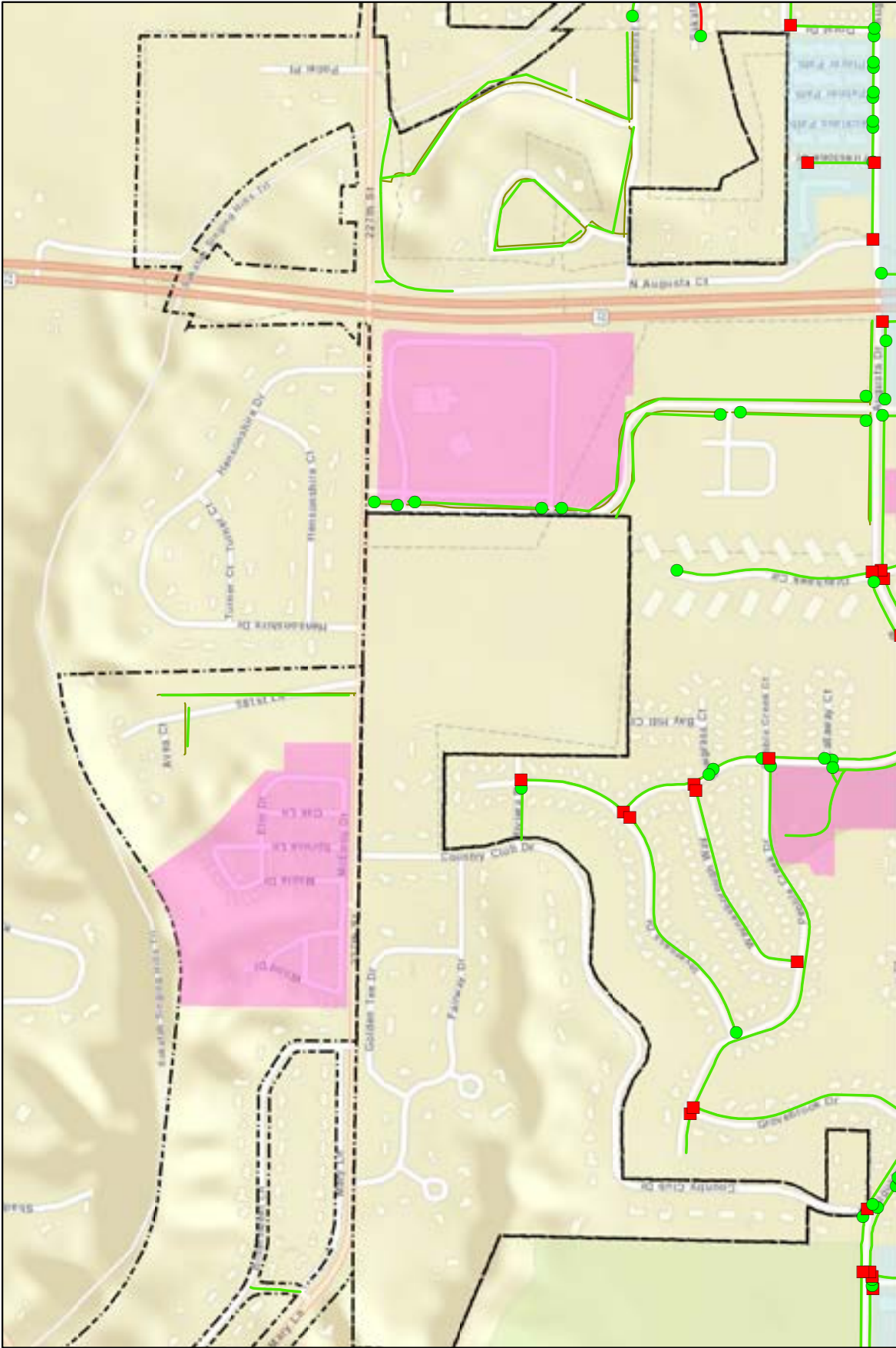


Figure M2



0 0.075 0.15 Miles

Figure M3



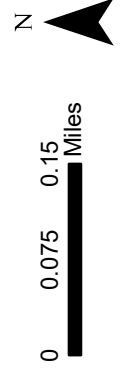
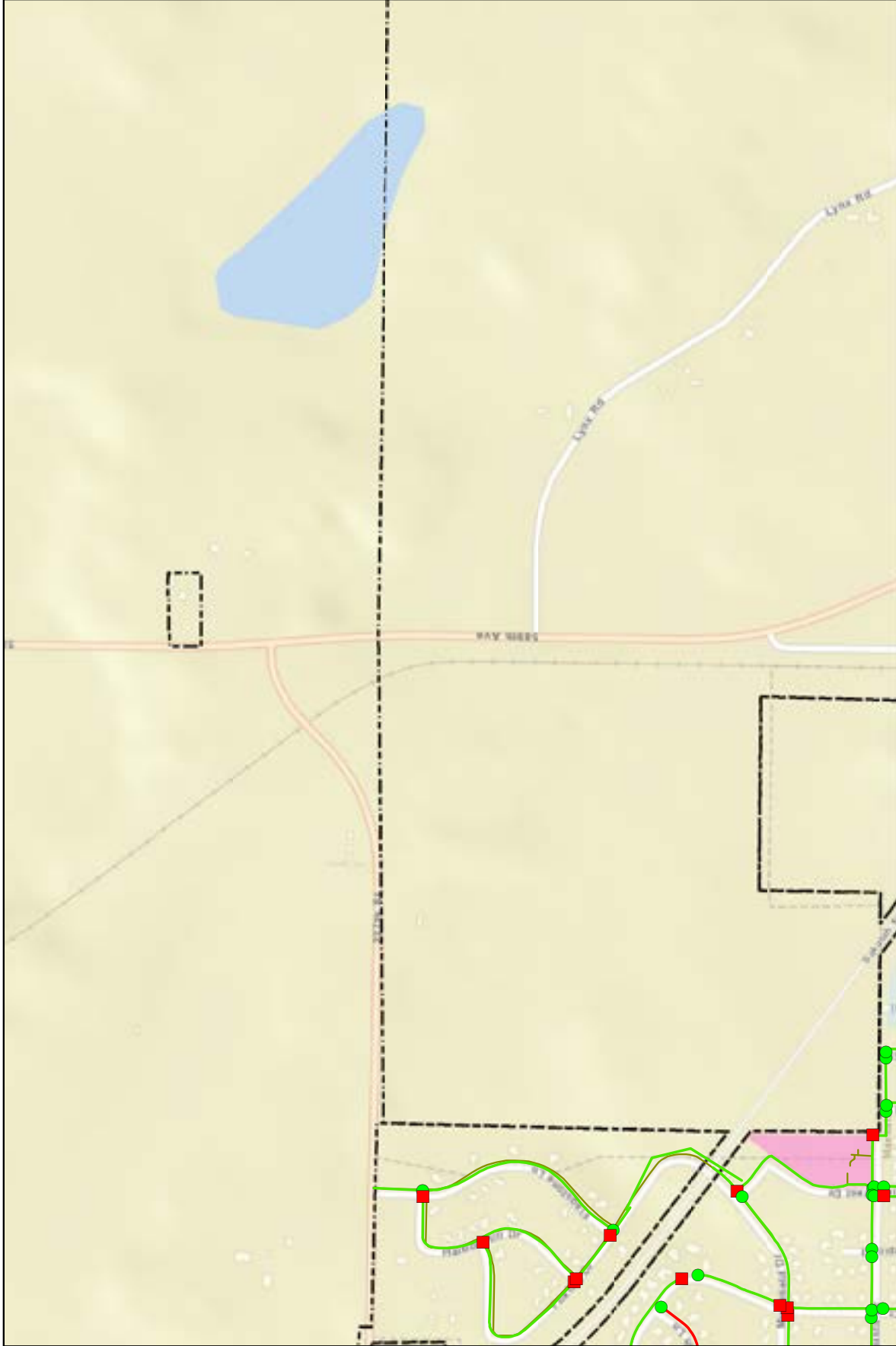


Figure M4

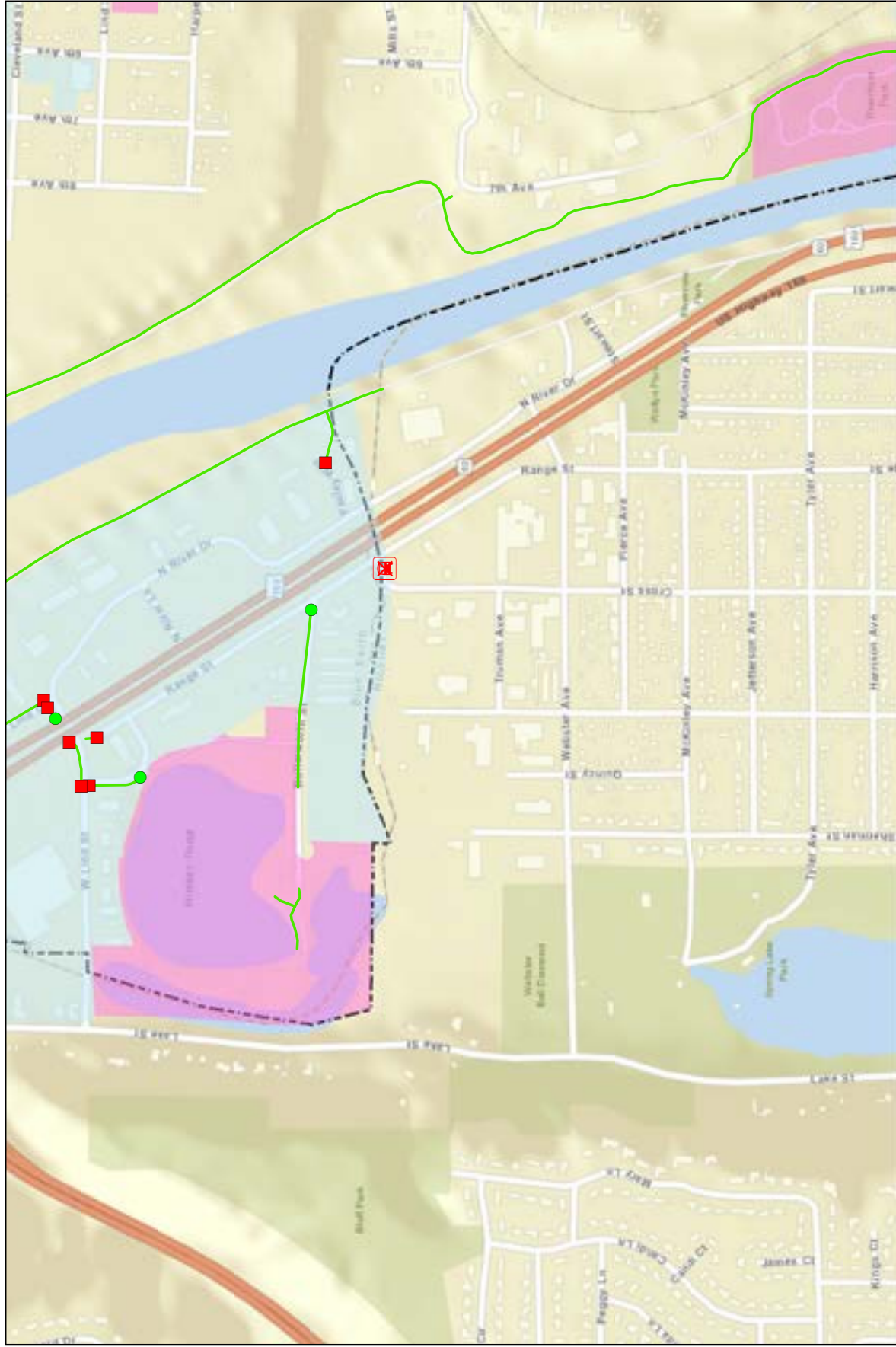


Figure M5

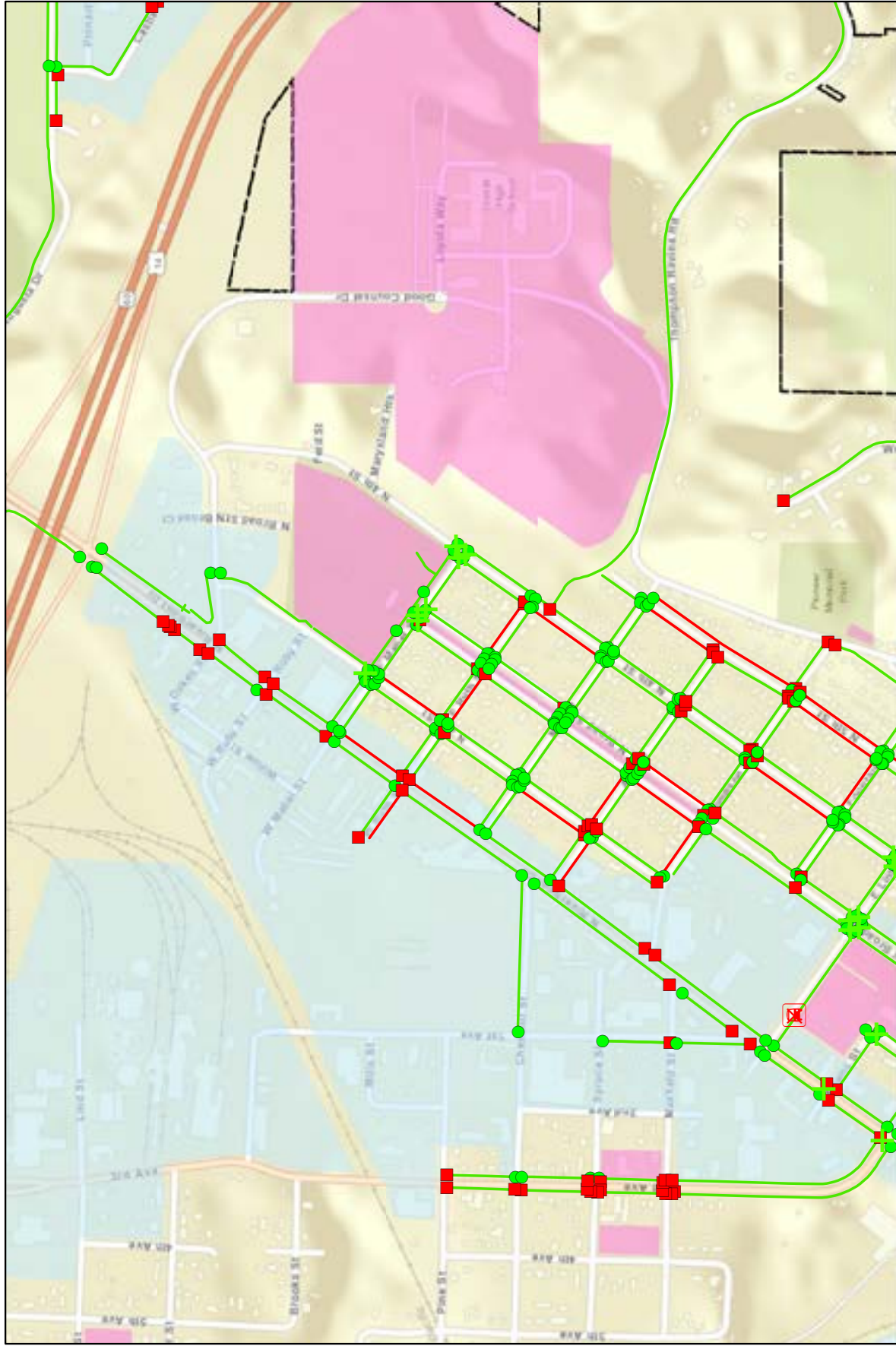
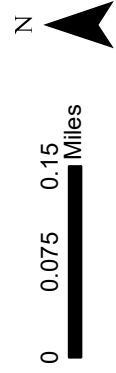


Figure M6



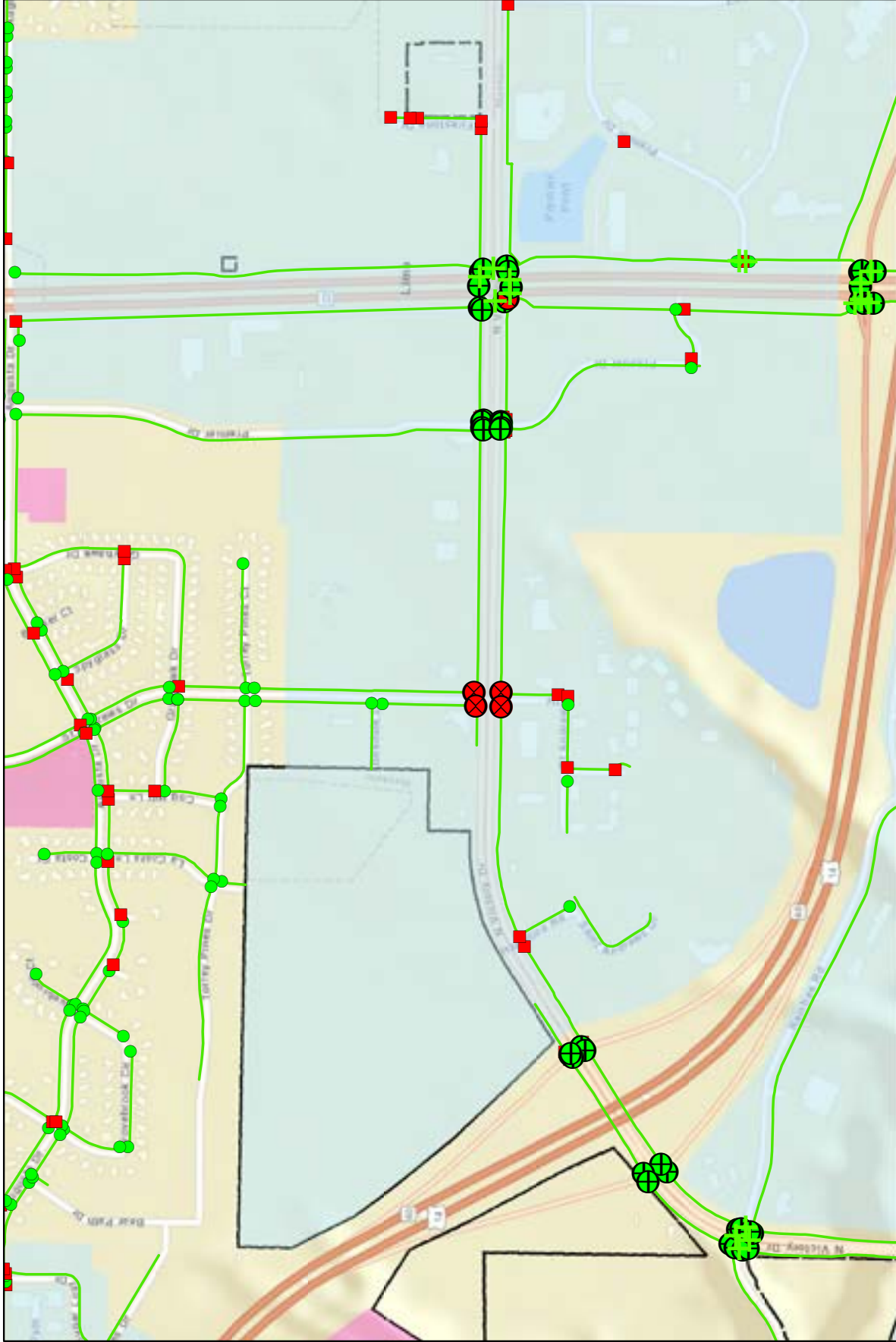


Figure M7

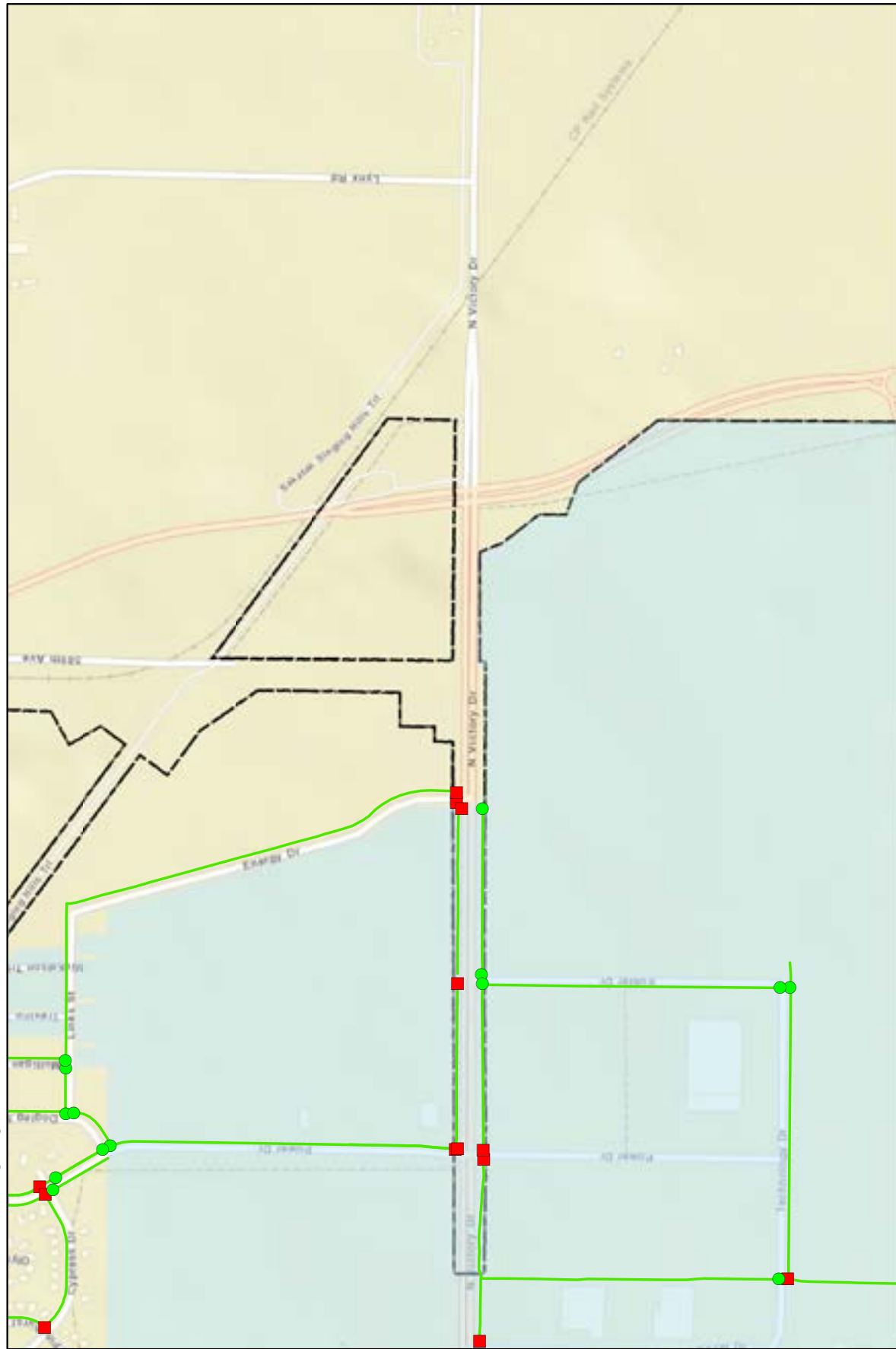


Figure M8

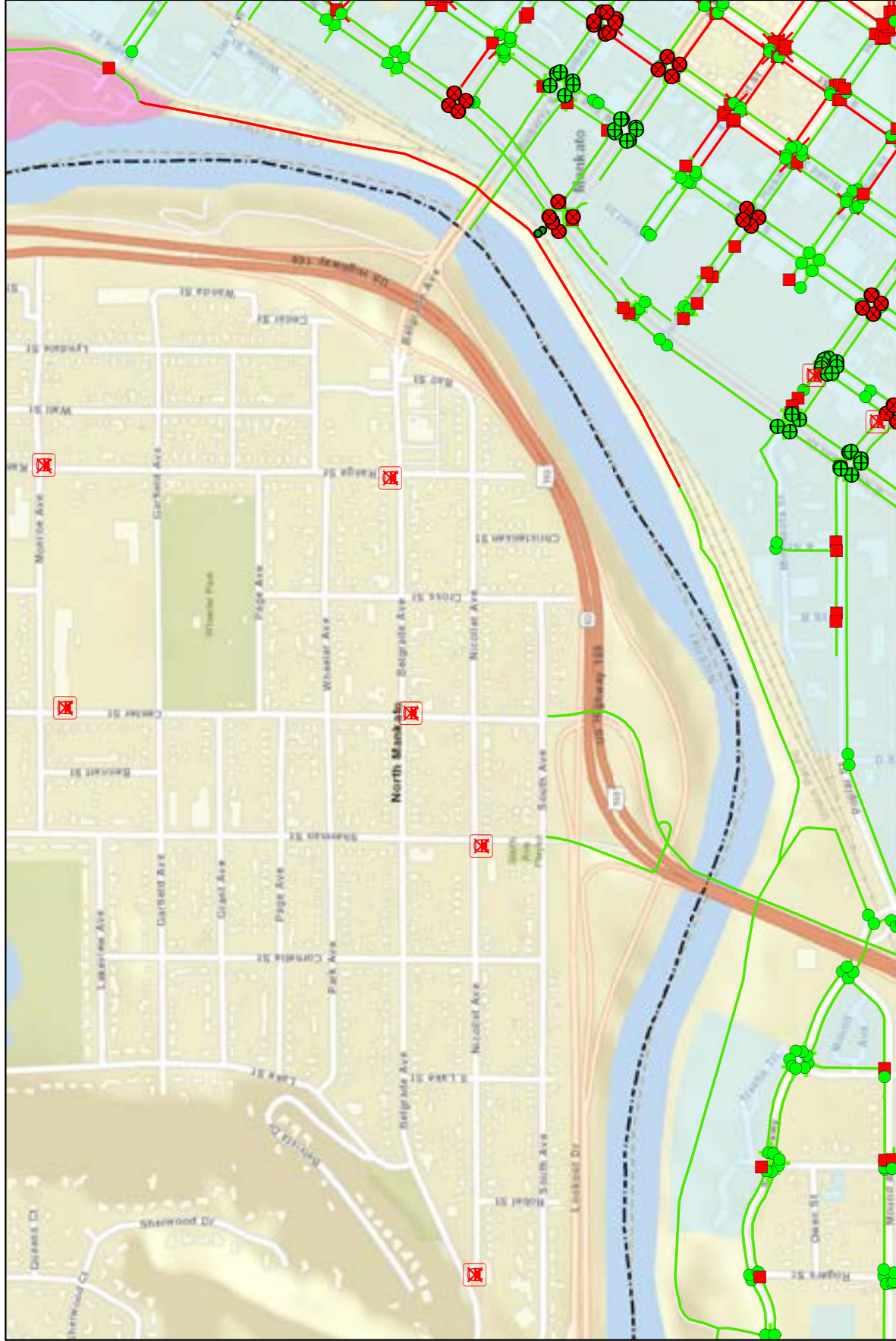
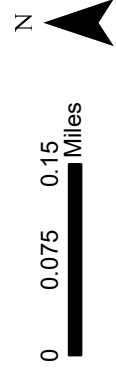


Figure M9



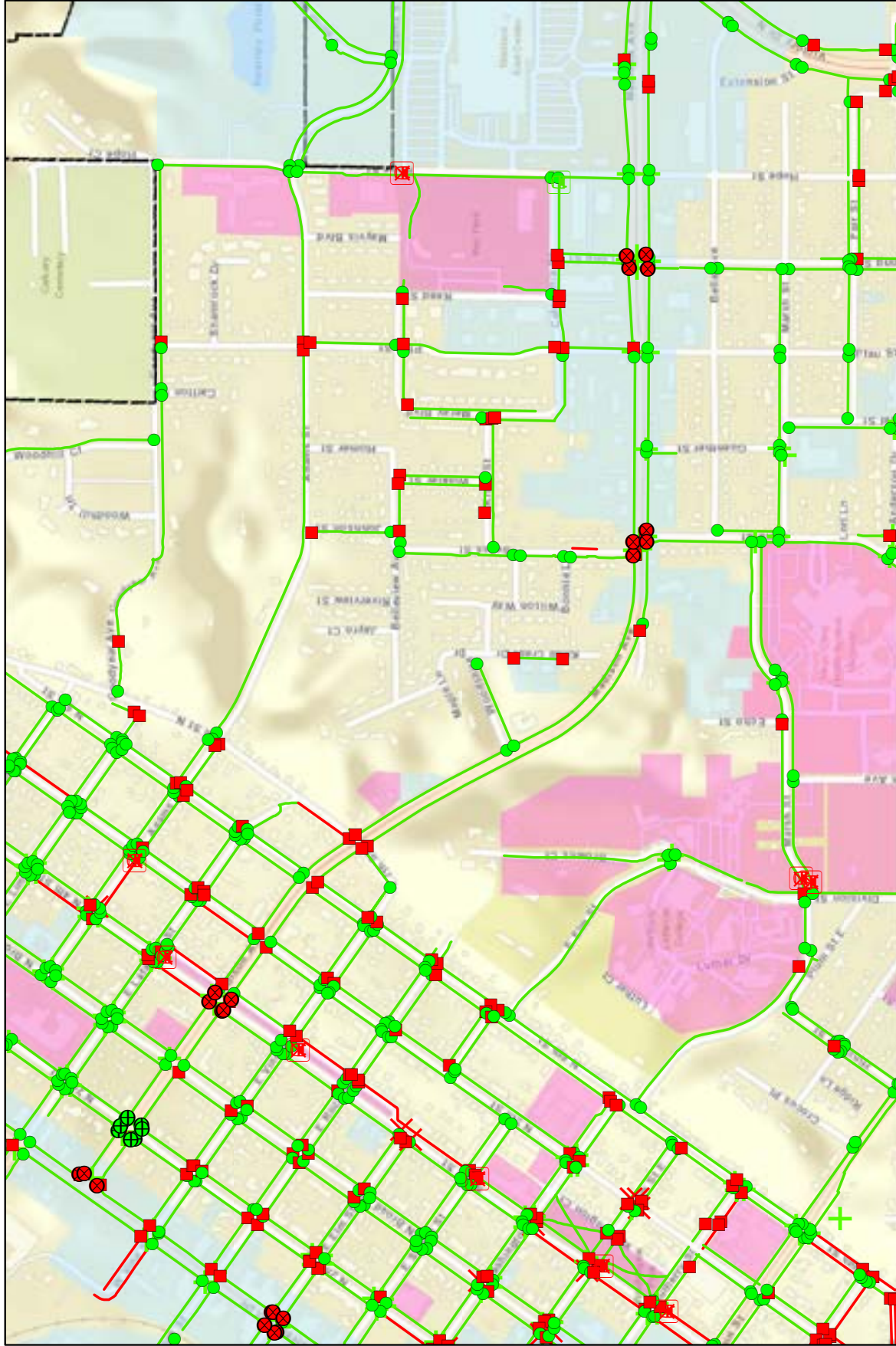
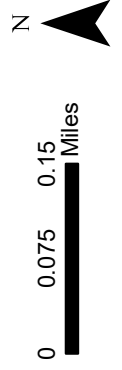


Figure M10



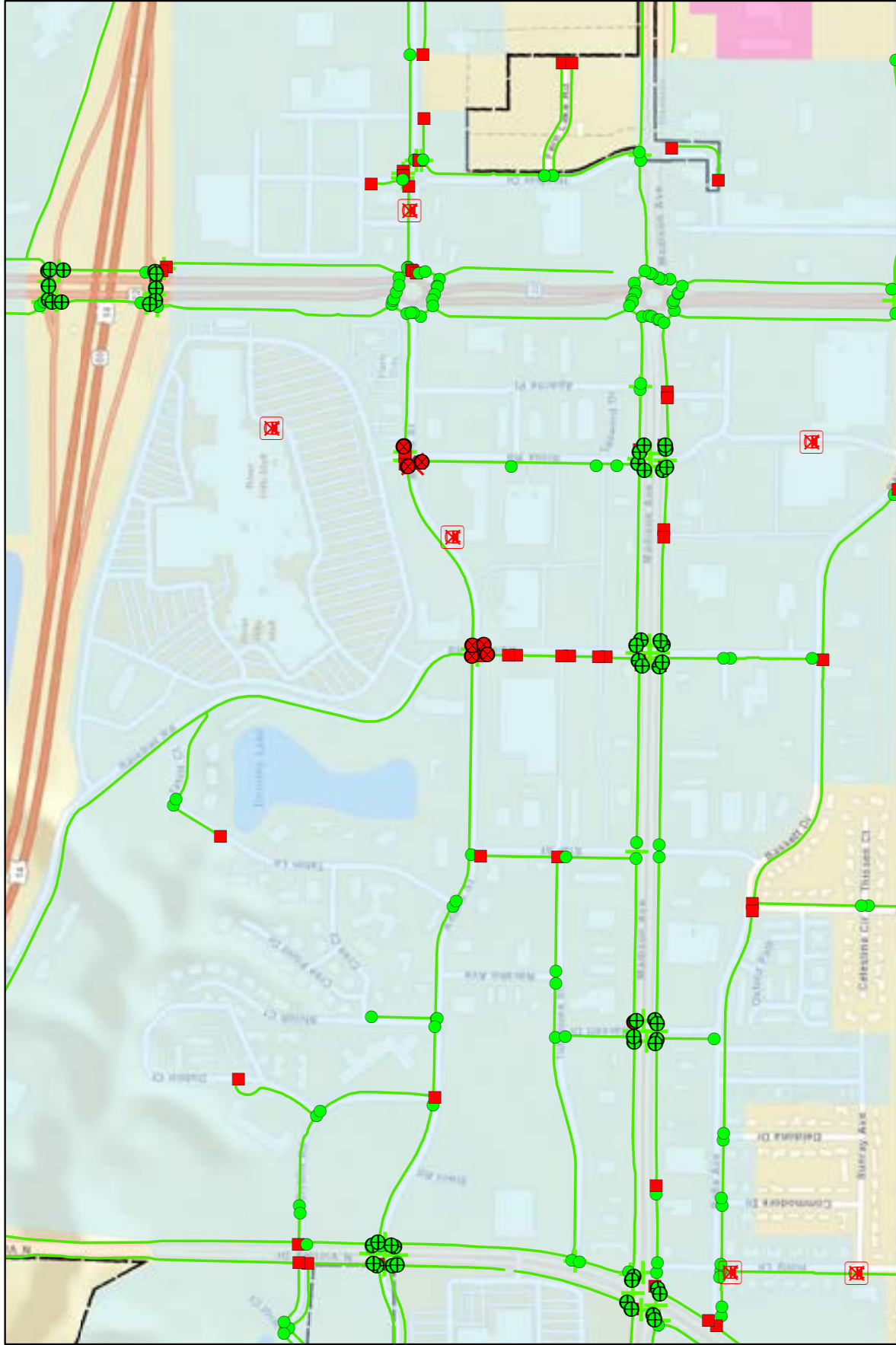
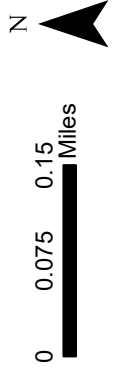


Figure M11



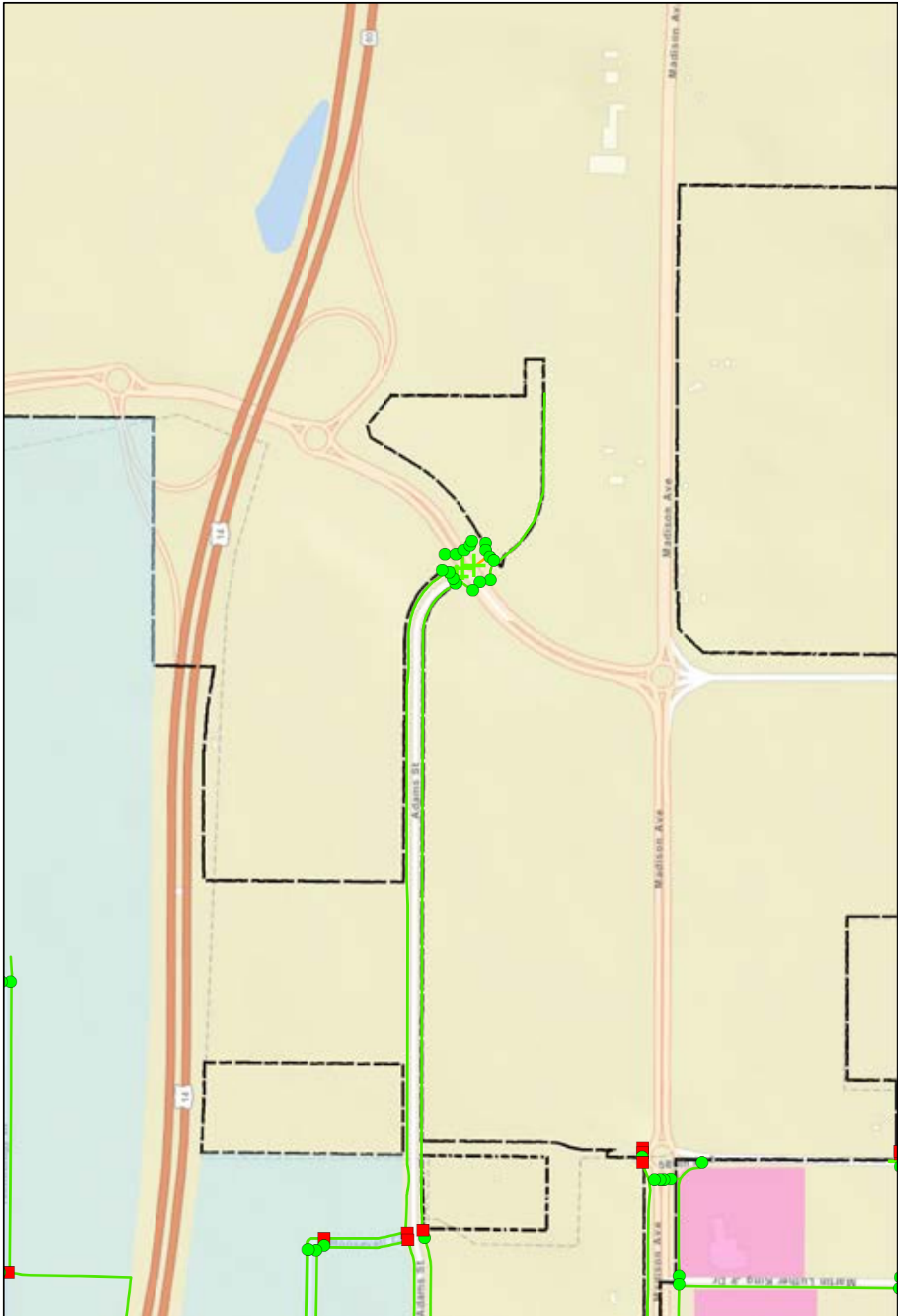
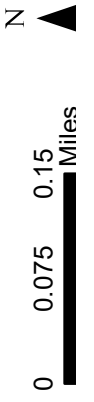


Figure M12



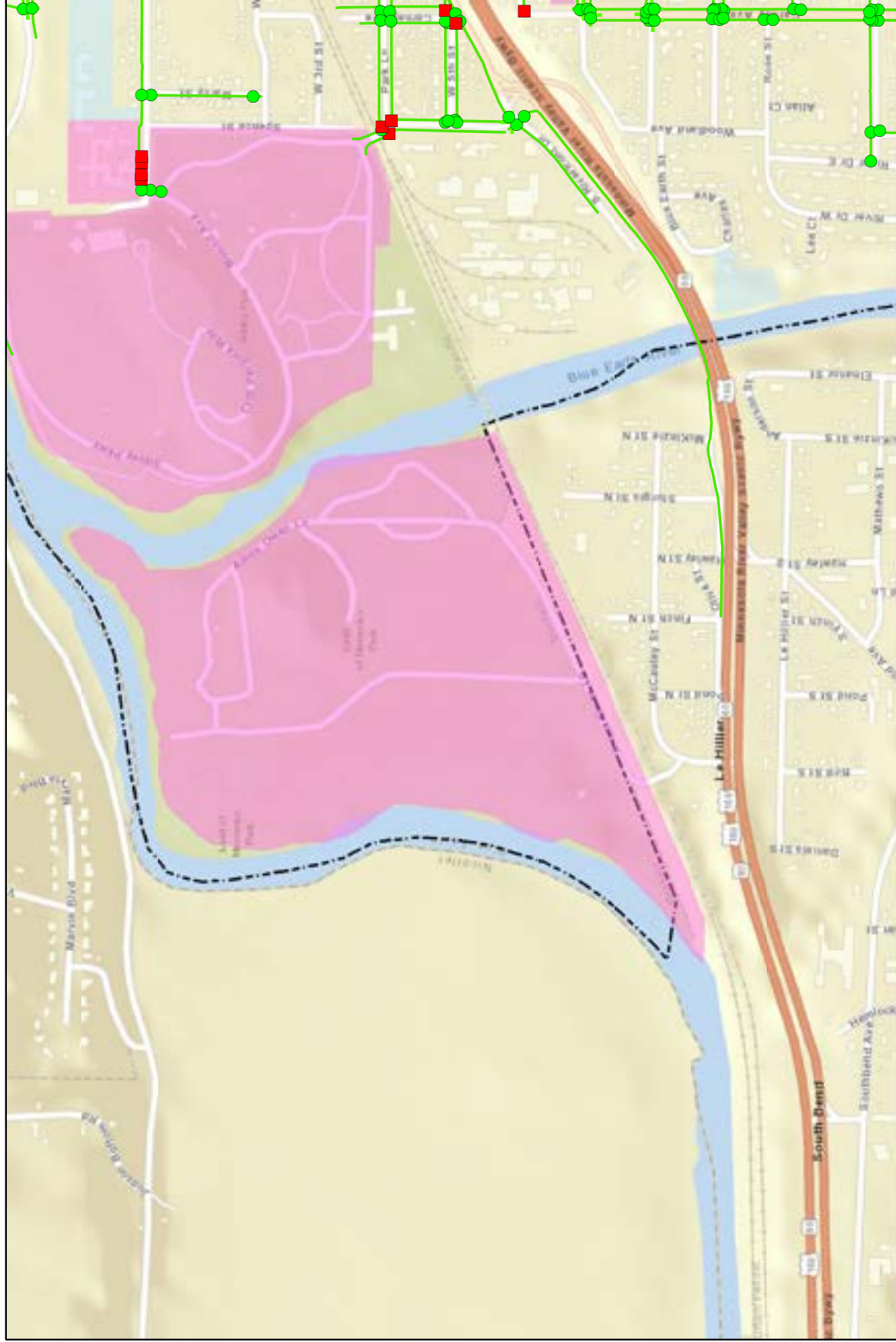


Figure M13



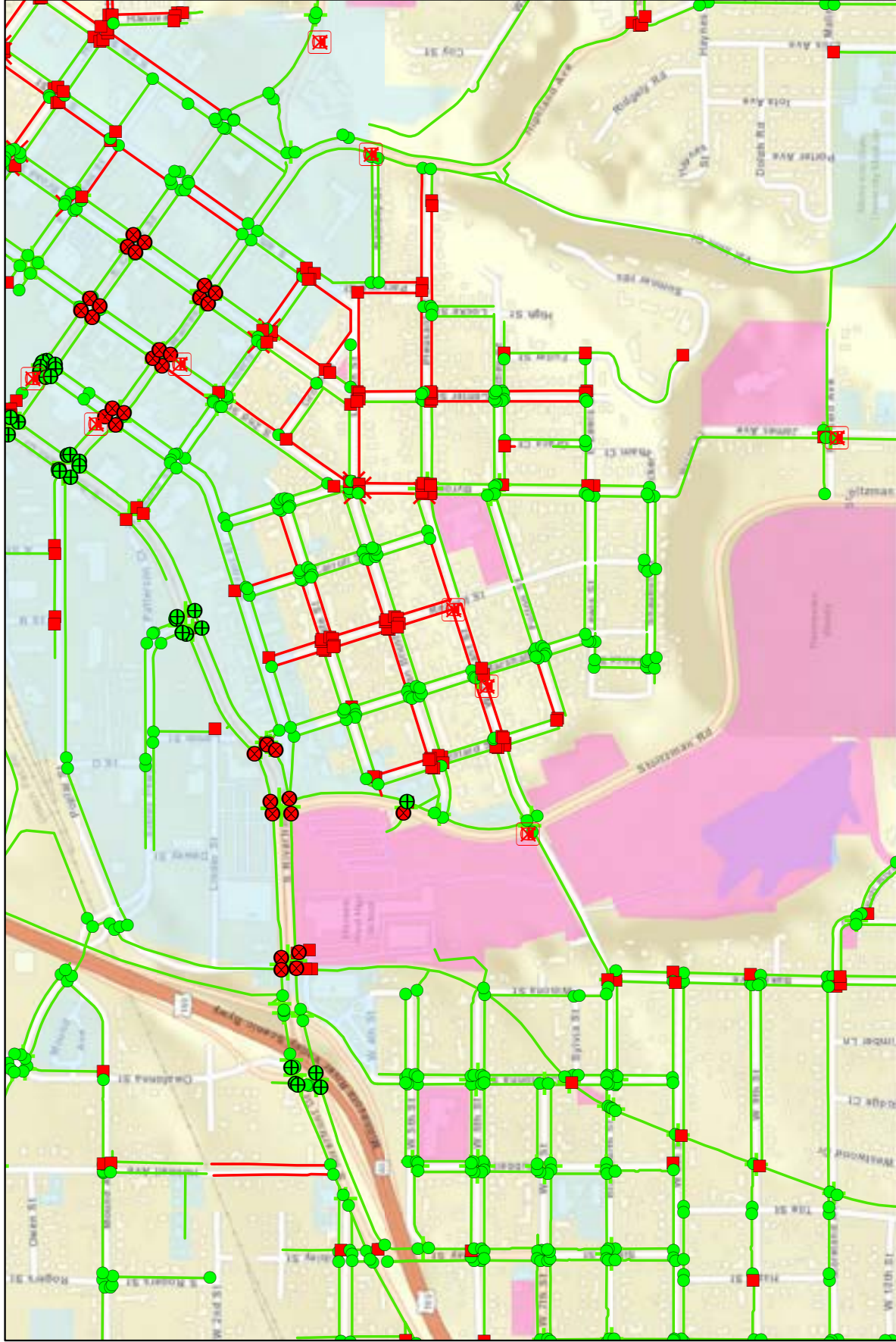
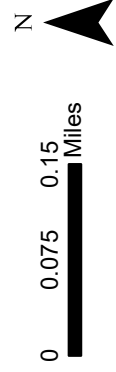


Figure M14



Mankato Area Planning Organization

November 2023

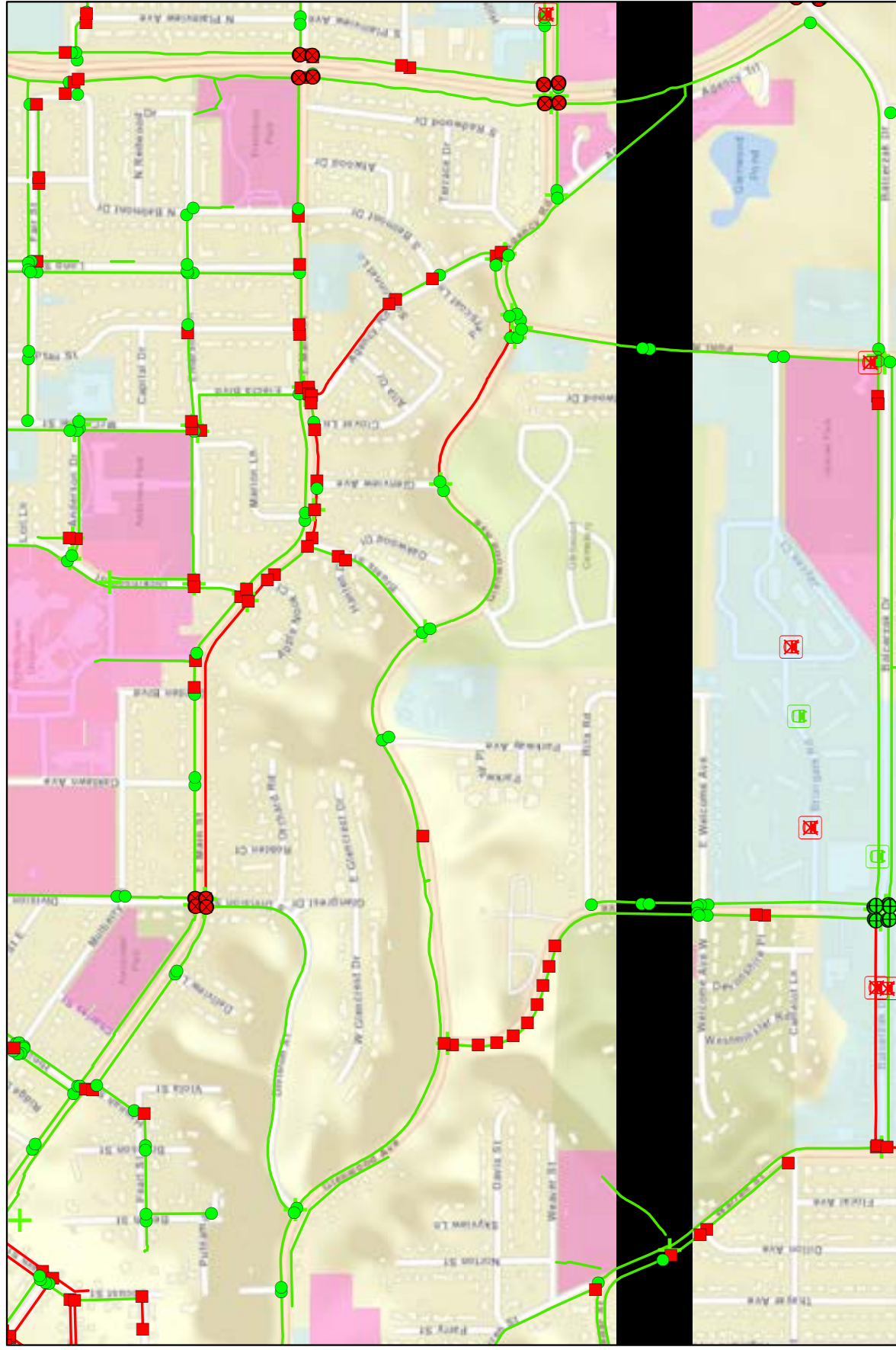


Figure M15

Mankato Area Planning Organization

November 2016

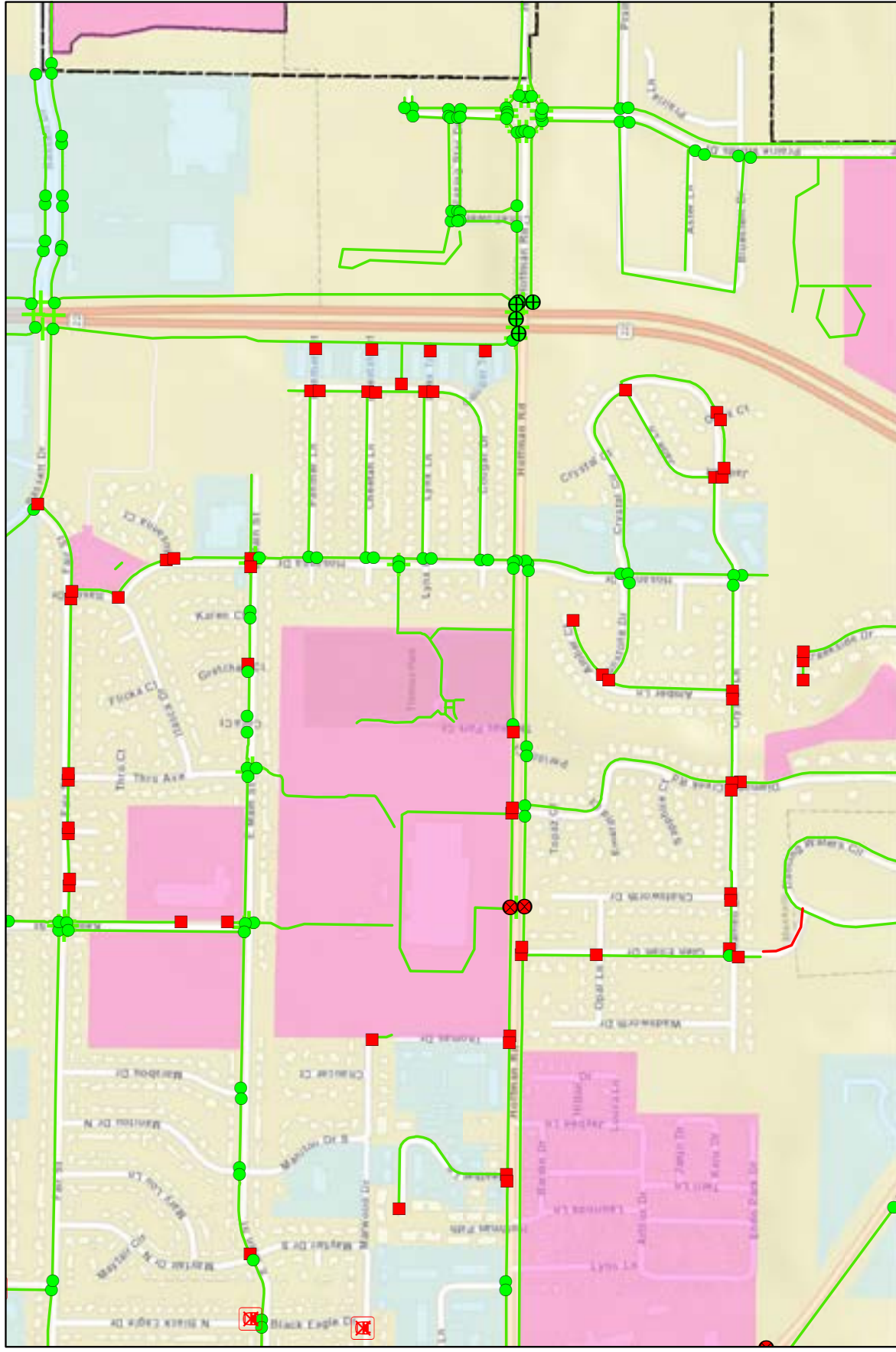
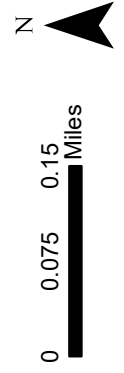


Figure M16



Mankato Area Planning Organization

November 2023

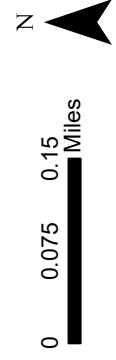
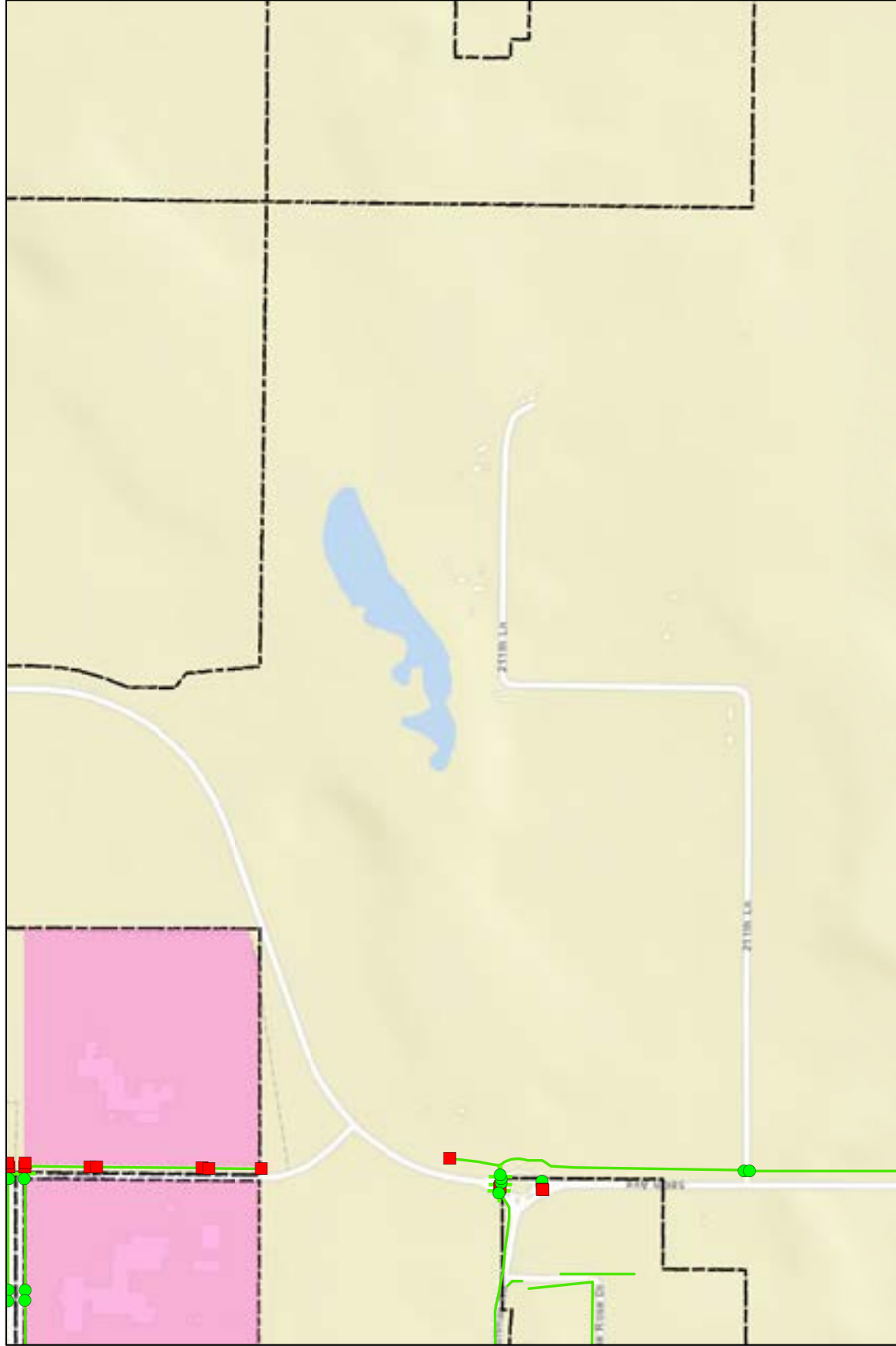
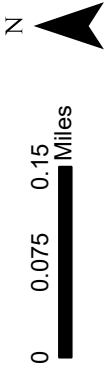


Figure M17



Figure M18



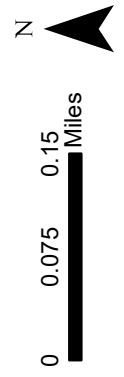


Figure M19

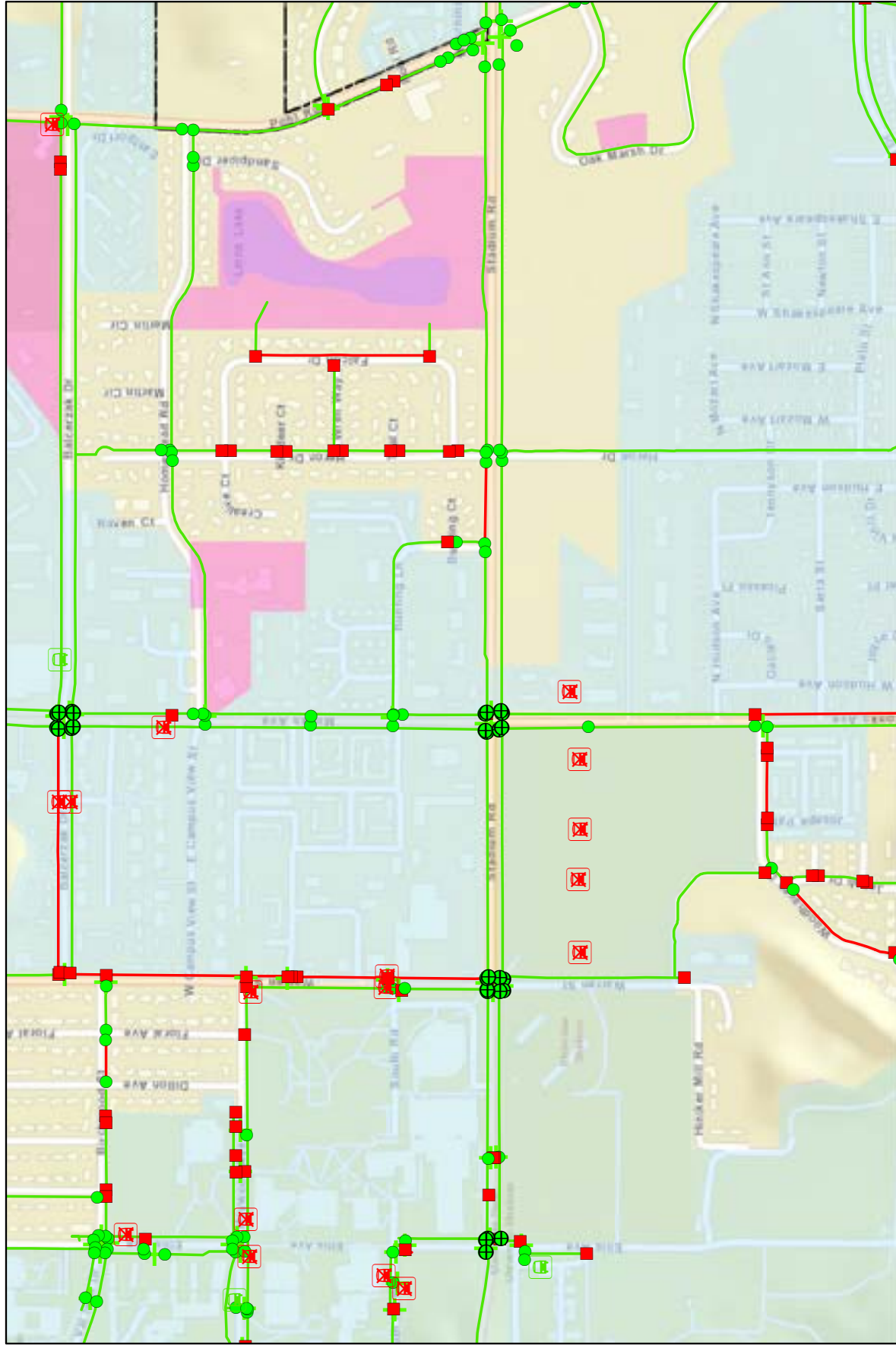


Figure M20



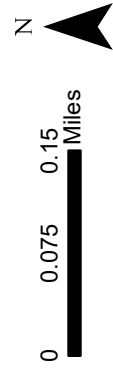
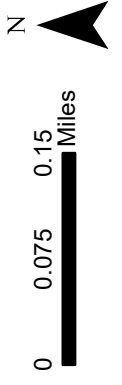


Figure M21



Figure M22



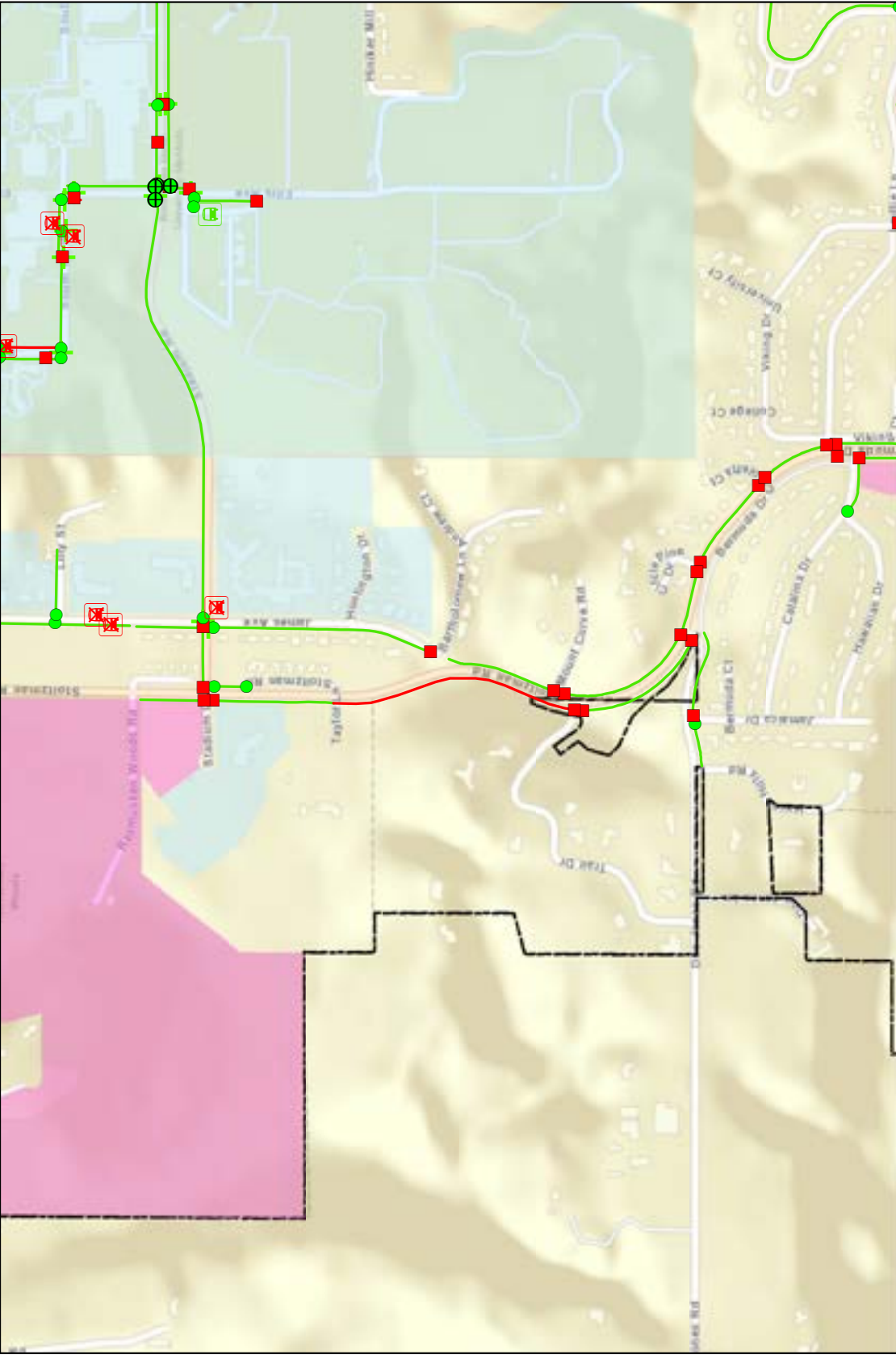


Figure M23

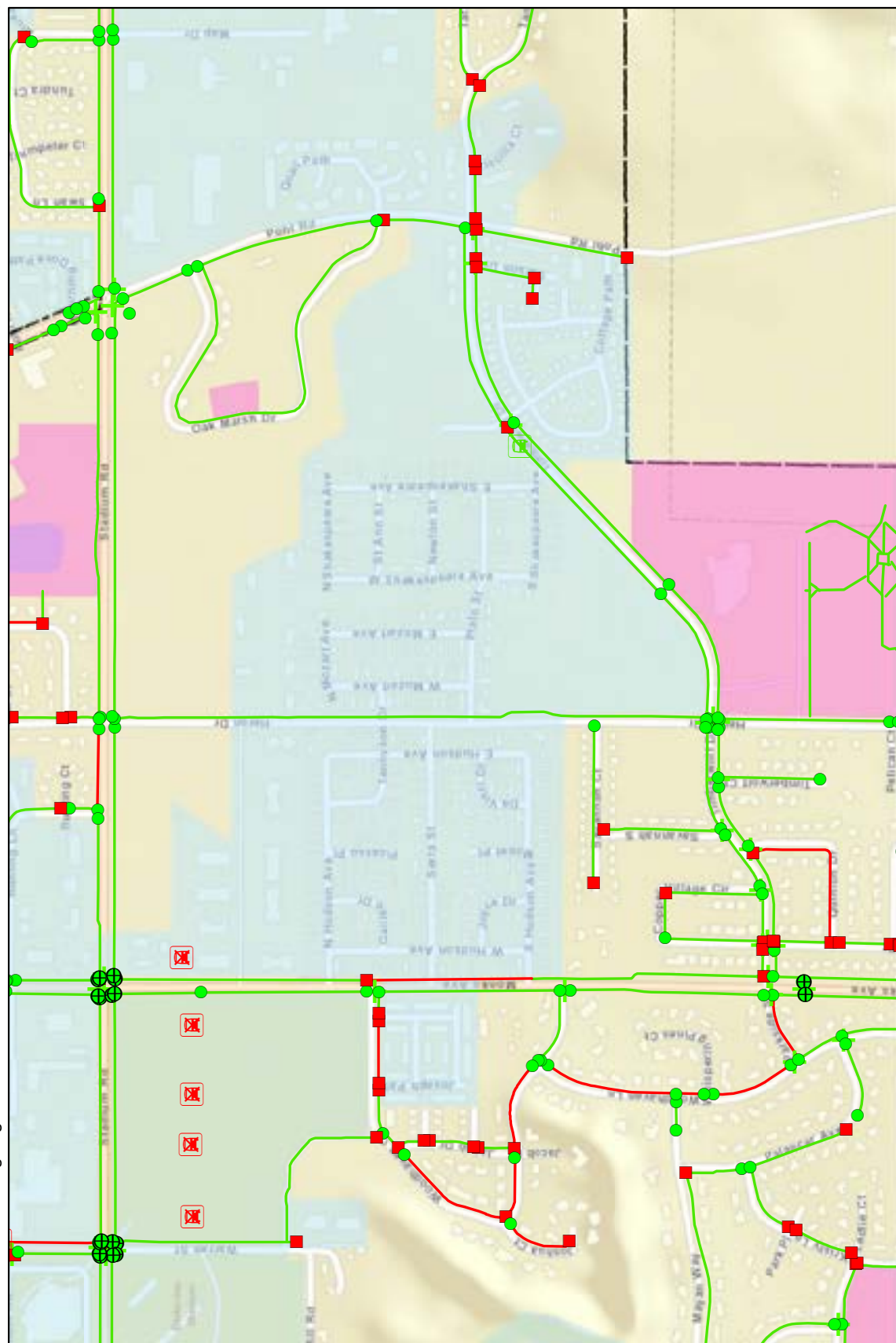


Figure M24

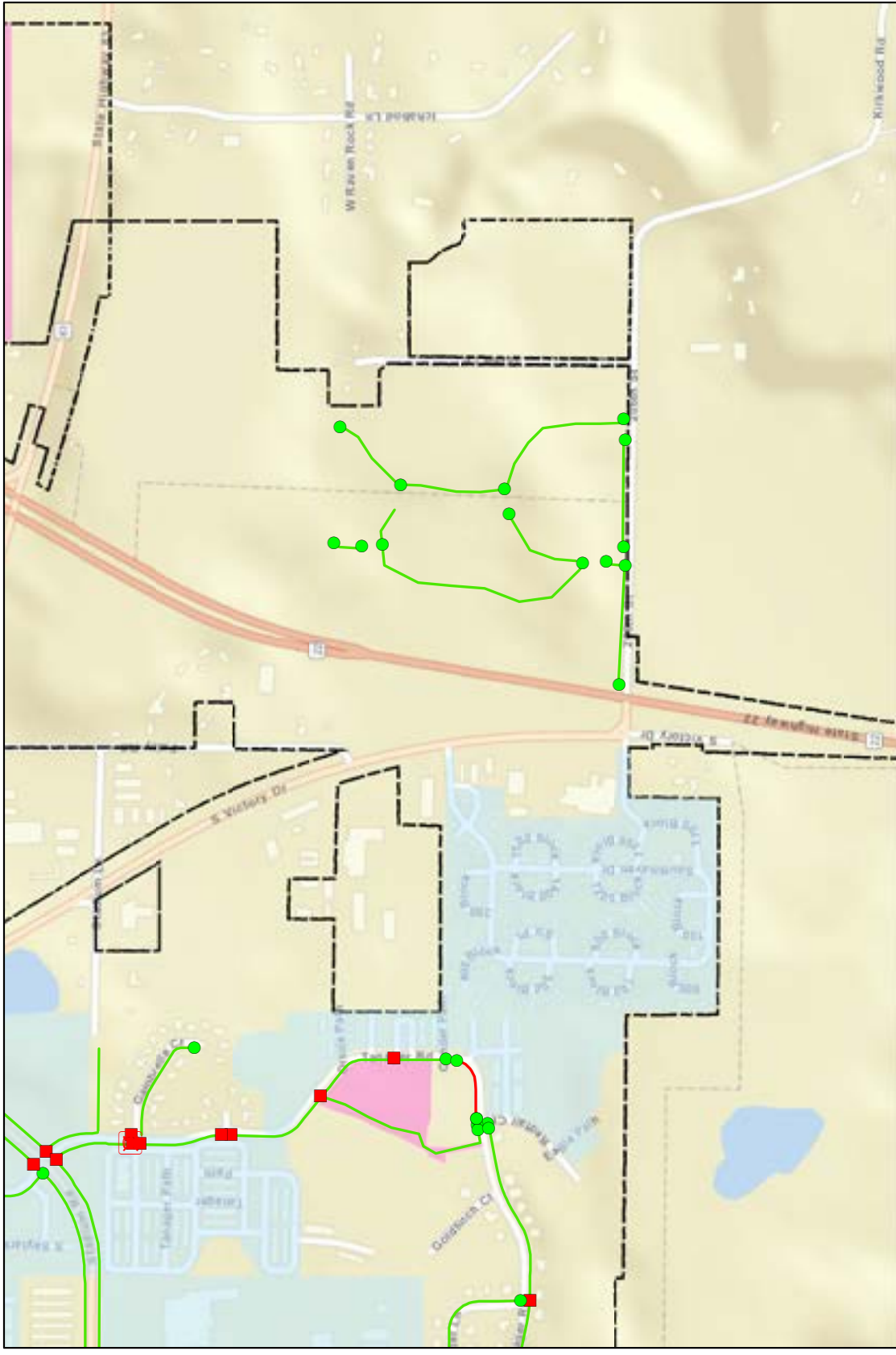


Figure M25

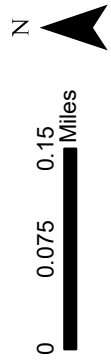


Figure M26

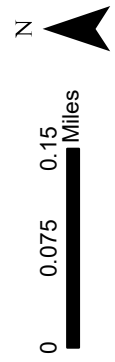


Figure M27

Appendix 3-B: Self-Evaluation - Policy and Practice Review

Appendix 3-B: Self-Evaluation – Policy and Practice Review

Review of Policies

The City's policies and practices include any City, department, or division policies and practices that direct staff in its daily work activities. Policies and practices that relate to accessibility and ADA conformance include:

The City of Mankato Complete Streets Plan and Policy (2015):

This Plan and Policy identifies Complete Streets as a transportation policy and design approach that guides streets to be planned, designed, operated, and maintained to enable safe, convenient, and comfortable travel and access for users of all ages and abilities regardless of their mode of transportation.

The following policy language is included under design standards and maintenance according to the Mankato Complete Streets Plan and Policy:

- The City Engineer shall include bicycle, pedestrian and transit facilities in all streets construction, reconstruction, rehabilitation and pavement maintenance projects conducted by or behalf of the City, as appropriate, subject to the exceptions contained herein.
- The City shall plan, design, build and maintain all bicycle, pedestrian, and transit facilities in accordance with accepted federal, state and local standards and guidelines, but will consider innovative and/or non-traditional design options as appropriate.

This Plan and Policy also provides facility design guidelines (specifically calling for 5-foot wide sidewalks in general and 8-foot sidewalks where buildings abut the walk) as well as crosswalk marking specifications.

Policy Understanding and Recommended Revision:

By adopting this policy, the City is stating that it will design facilities according to federal, state, and local standards and guidelines that will accommodate all users regardless of transportation mode. No barriers to accessibility were identified in this plan/policy.

The City of Mankato Public Sidewalk Replacement in Right-of-Way

This document defines the responsibilities of the City and homeowners to repair or replace sidewalk in the City of Mankato. This program is in place to encourage property owners to correct defective sidewalks.

The policy contains Construction Requirements for Sidewalks on Public Rights-of-Way which states that sidewalk construction must "Comply with Americans Disabilities Act requirements. All noncompliant construction shall be removed and replaced at expense of contractor or homeowner at the request of engineer." The Policy also requires that ADA pedestrian curb ramps at each intersection where new walk is installed.

Policy Understanding and Recommended Revision:

By adopting this policy, the City is stating that it will ensure sidewalk and pedestrian ramp facilities are designed ADA compliant. No barriers to accessibility were identified in this plan/policy.

City of Mankato City Code

The City of Mankato City Code provides several provisions dealing with sidewalk infrastructure including the following sections:

1. Ice and Snow on Public Sidewalks – Provides property owner responsibilities to remove ice or snow from sidewalks abutting their property within 24 hours and prohibits snow removal from private property be placed on city property.
2. Construction of Roadway, Sidewalk, and Curb – Specifications states that construction/repair of sidewalk or curb shall be in accordance with the specifications and standards adopted by the city and filed with the Division of Engineering.
3. Right-of-Way (ROW) Management – imposes regulations on placement and maintenance of equipment in the ROW and specifies standards related to construction or installation work. There is no mention of accessibility or ADA compliance, however, provisions state that procedures are subject to “reasonable standards and requirements of the City Engineer” or by “the judgement of the City Engineer.”
4. Sidewalk Painting – painting is prohibited on sidewalks.
5. Curbscuts maintenance – This provides standard procedure for implementing curb cuts in accordance with approved subdivision plats or which meets city curbscut standards.

Policy Understanding and Recommended Revision:

The provisions in the code do not directly mention compliance with ADA Standards. However, by including statements such as “accordance with the specifications and standards adopted by the city and filed with the Division of Engineering” or “reasonable standards and requirements of the City Engineer,” compliance with ADA standards is implied. Pedestrian infrastructure construction in the City of Mankato is mandated to meet the ADA Design Standards and Procedures as outlined in Appendix 3-G which includes adherence to PROWAG, Access Board guidance, and MnDOT Standard Plates among others.

Participants at the first MAPO ADA Transition Plan and Inventory Public Information Meeting expressed concerns for snow and ice removal stating that certain property owners were not clearing their sidewalks of snow thus creating temporary barriers to ADA. Enforcement of snow and ice removal policy is not included in the City Code.

Review of Practices

The City of Mankato employs many formal and informal practices and methods related to the development, implementation, and maintenance of pedestrian infrastructure in public rights-of-way. These are as follows:

- Development – Typically plans that are submitted by consultants or designed by City staff are reviewed by various departments for compliancy on all levels to ensure all aspects of ADA compliance are met.
- Implementation – City staff inspects various types of construction type projects ensuring that they meet ADA requirements. Staff uses MNDOT ADA inspection checklists to ensure compliant pedestrian facilities within public rights-of-way.
- Maintenance – The City Sidewalk Replacement Program allows residents to make a formal complaint about non-compliant sidewalks for various reasons. This triggers the project to be put on a list for replacement and will generally be completed the following year unless immediate action is necessary.

Practice Recommendations

The general public made MAPO partners aware of some recent improvements to facilities that alleviated some ADA deficiencies while leaving adjacent facilities non-compliant. The following practices are recommended as part of this review, based on that feedback:

- Continue to reconstruct all non-compliant pedestrian ramps at the same time at a given intersection when planning to reconstruct one. Pedestrian ramps function in unison at intersections to provide access to the PAR. Improving one while leaving the other(s) non-compliant does not remedy accessibility deficiencies nor lend to a fully functional and accessible PAR.
- Consider working with owners of properties generating high pedestrian traffic, such as apartments, when reconstructing adjacent pedestrian facilities in the public right-of-way. Creating owner awareness could entice owners to take necessary steps to ensure facilities extending from buildings on their property are ADA compliant and free of barriers to accessibility when connecting to the PAR.

Appendix 3-C: ADA Transition Plan Projects referenced from the City of Mankato Capital Improvements Plan

Capital Improvements Plan (CIP) Projects That Include (Consider) Accessible Pedestrian Infrastructure

Community Investment Plan

The City of Mankato’s 2023 – 2027 Community Investment Plan (CIP) identifies street projects the City will undertake in the five-year period. Projects outlined in this document are identified on the following pages and can be accessed through the City’s website at the following link: <https://www.mankatomn.gov/your-government/city-manager-s-office/budget>. Click on 2023- 2027 CIP Addendum.

State Transportation Improvement Program

The City of Mankato has several transportation projects scheduled in the State Transportation Improvement Program (STIP). Some of these projects are included in the CIP while others are not. Those projects not listed in the CIP are listed below.

STIP Area	Proposed Improvements	Year
MSAS 101	ADA Improvements	2024
Sibley Park	New Trail	2025

The City will continue to implement infrastructure and maintenance improvements as part of its long-range community investment planning and pavement management plan. With these efforts, the City will incorporate ADA-compliant pedestrian facilities and complete accessible infrastructure improvements as needed to ensure access for all users.

Appendix 3-D: Public Outreach Results

Public Outreach Results

Input from the community has been gathered and used to help define priority areas for improvements within the City of Mankato public rights-of-way.

Public outreach for the creation of this document consisted of the following activities:

Public Open House

MAPO agencies held one public open house to gather input on the state of pedestrian infrastructure in each jurisdiction and priority preferences for projects moving forward.

All stakeholders within MAPO jurisdictions were invited to attend a public information meeting on September 26, 2023 at the Mankato Intergovernmental Center to receive information on the project and provide their feedback on the process and help project staff identify locations that pose barriers to accessibility.

Project Website

This document was available for public comment online between the dates of September 26 to October 6, 2023.

A grievance procedure was also available on the site in which the general public could file an electronic grievance, placing comments directly on an interactive map for the city to include in the results of the Self-Evaluation. There were no comments received through this application.

Appendix 3-E: Grievance Procedure

ADA Grievance Procedure

In accordance with 28 CFR 35.107(b), the City has developed the following ADA grievance procedure for the purpose of the prompt and equitable resolution of citizens' complaints, concerns, comments, and other grievances.

The City understands that members of the public may desire to contact staff to discuss ADA issues without filing a formal grievance. Members of the public wishing to contact the ADA Coordinator should reference the contact information in Appendix 3-F. Contacting staff to informally discuss ADA issues is welcome and does not limit a person's ability or right to file a formal grievance later. Non-formal grievances can be given to the City of Mankato 311 department to be entered in as a Customer Service Request.

Those wishing to file a formal written grievance with the City of Mankato may do so by one of the following methods:

Telephone

Contact the City of Mankato's ADA Coordinator listed in the Contact Information section of Appendix 3-F to submit an oral grievance. The staff person will use the internet to electronically submit the grievance on behalf of the person filing it.

Paper Submission

A paper copy of the City's grievance form is available by request from the City of Mankato's ADA Coordinator (contact information in Appendix 3-F). Complete the form and submit it to the City of Mankato ADA Coordinator at the address listed.

The City of will acknowledge receipt of the grievance to the citizen within 10 working days of the submission. City staff will then provide a response or resolution to the grievance or will provide information on when the citizen can expect a response. If the grievance filed does not fall within the City of Mankato's jurisdiction, staff will work with the citizen to contact the agency with jurisdiction.

When possible (typically within 60 calendar days or less of the grievance submission) City staff will conduct an investigation to determine the validity of the alleged violation. As a part of the investigation, internal staff will be consulted to fully understand the complaint and possible solutions. The City of Mankato staff will contact the citizen to discuss the investigation and proposed resolution.

The City of Mankato will consider all grievances within its particular context or setting. Furthermore, the department will consider many varying circumstances including: access to applicable services, programs, or facilities; the nature of the disability; essential eligibility requirements for participation; health and safety of others; and degree to which a potential solution would constitute a fundamental alteration to the program, service, or facility, or cause undue hardship to the City of Mankato.

Accordingly, the resolution by The City of Mankato of any one grievance does not constitute a precedent upon which the City is bound or upon which other complaining parties may rely.

Complaints of Title II violations may be filed with the Department of Justice (DOJ) within 180 days of the date of discrimination. In certain situations, cases may be referred to a mediation program sponsored by the DOJ. The DOJ may bring a lawsuit where it has investigated a matter and has been unable to resolve violations.

For more information, contact:

U.S. Department of Justice Civil Rights Division
950 Pennsylvania Avenue, N.W. Disability Rights Section – NYAV
Washington, D.C. 20530 www.ada.gov
(800) 514-0301 (voice)
(800) 514-0383 (TTY)

Title II may also be enforced through private lawsuits in Federal court. It is not necessary to file a complaint with the DOJ or any other Federal agency, or to receive a “right-to-sue” letter, before going to court.

File Retention

The City of Mankato shall maintain ADA grievance files on behalf of the City for a period of seven years.

City of Mankato, MN Grievance Form

Instructions: Please fill out this form completely and submit to:

City of Mankato ADA Coordinator
City of Mankato, MN
10 Civic Center Plaza
Mankato, MN 56001

Or it can be emailed to the ADA coordinator at jonnelson@mankatomn.gov

Complainant - person filing grievance:

Name: _____ Date: _____

Address: _____ City, State, Zip Code: _____

Home: _____ Cell: _____

Work: _____ Email: _____

Representing - person claiming an accessibility issue or alleging an ADA violation (if not the complainant):

Name: _____ Date: _____

Address: _____ City, State, Zip Code: _____

Home: _____ Cell: _____

Work: _____ Email: _____

Description and location of the alleged violation and the nature of a remedy sought.

If the complainant has filed the same complaint or grievance with the United States Department of Justice (DOJ), another federal or state civil rights agency, a court, or others, the **name of the agency or court where the complainant filed it and the filing date**.

Agency or Court: _____ Contact Person: _____

Address: _____ City, State, Zip Code: _____

Phone Number: _____ Date Filed: _____

Appendix 3-F: Contact Information

Responsible Officials and Key Staff

Responsible Officials Contact Information

City of Mankato ADA Coordinator:

Jon Nelson, City of Mankato Public Works – Senior Civil Engineer

10 Civic Center Plaza

Mankato, MN 56001

P: (507) 387-8637

E: JonNelson@mankatomn.gov

Appendix 3-G: ADA Design Standards and Procedures

ADA Design Standards and Procedures

Design Standards

Public Rights-of-Way Accessibility Guidelines

Public Rights-of-Way Accessibility Guidelines (PROWAG), developed by the Access Board, are draft guidelines that address accessibility in the public rights-of-way. Sidewalks, street crossings, and other elements of the public rights-of-way present unique challenges to accessibility for which specific guidance is considered essential. The Access Board is developing these guidelines that will address various issues, including access for visually impaired pedestrians at street crossings, wheelchair access to on-street parking, and various constraints posed by space limitations, roadway design practices, slope, and terrain. PROWAG can be found at <http://www.access-board.gov/attachments/article/743/nprm.pdf>.

In 2010 and 2015, as a part of the development of MnDOT's Transition Plan, MnDOT Issued Technical Memorandum 10-02-TR-01 Adoption of Public Rights of way Accessibility Guidance and Technical Memorandum No. 15--02-TR-01 Adoption of Public Rights-of -Way Accessibility Guidance (PROWAG), respectively to their staff, cities, and counties. These memorandums, which have both expired, make the PROWAG the primary guidance for accessible facility design on MnDOT projects. In addition, these technical memorandums can be found on MnDOT's website. See (<http://techmemos.dot.state.mn.us/>).

Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way

The Access Board is proposing these accessibility guidelines for the design, construction, and alteration of pedestrian facilities in the public right-of-way. The guidelines ensure that sidewalks, pedestrian street crossings, pedestrian signals, and other facilities for pedestrian circulation and use constructed or altered in the public right-of-way by state and local governments are readily accessible for pedestrians with disabilities. When the guidelines are adopted, with or without additions and modifications, as accessibility standards in regulations issued by other federal agencies implementing the ADA, Section 504 of the Rehabilitation Act, and the Architectural Barriers Act, compliance with these accessibility standards is mandatory. These proposed accessibility guidelines can be found on the Access Board website (<http://www.access-board.gov>) under Public Rights-of-Way or at <http://www.access-board.gov/attachments/article/743/nprm.pdf>.

Accessible Public Rights-of-Way Planning and Design for Alterations (August 2007)

This report and its recommendations are the work of the Public Rights-of-Way Access Advisory Committee (PROWAAC) – Subcommittee on Technical Assistance and are intended to provide technical assistance only. The report is not a rule and has no legal effect. It has not been endorsed by the U.S. Access Board, the Department of Justice, or the Federal Highway Administration of the Department of Transportation. Still it can be a technical advisory source for engineers and technicians who are planning and designing for alterations to pedestrian elements. This document is on the Access Board website (<http://www.access-board.gov>) or at <http://www.access-board.gov/attachments/article/756/guide.pdf>.

Minnesota Department of Transportation

Building on the adoption of PROWAG as planning and design guidance for accessible pedestrian facilities, MnDOT has developed additional planning, design, and construction guidance that is available to local agencies. Listed below is information on additional design guidance available. This is not intended to be an exclusive or comprehensive list of ADA guidance, but rather an acknowledgement of guidance staff should consider and a starting point for information on providing accessible pedestrian facilities.

The MnDOT Accessibility webpage, which has good information in a variety of subject areas related to ADA and accessibility, can be found at <http://www.dot.state.mn.us/ada/index.html>. The webpage also provides the ability to sign up for ADA policy and design training classes when available and to review material from

previous trainings.

Curb Ramp Guidelines: <http://www.dot.state.mn.us/ada/pdf/curbramp.pdf>

ADA Project Design Guide Memo: <http://www.dot.state.mn.us/ada/pdf/adaprojectdesignguidememo.pdf>
ADA Project Design Guide: <http://www.dot.state.mn.us/ada/pdf/adaprojectdesignguide.pdf>

Pedestrian Curb Ramp Details Standard Plans 5-297.250 can be found on MnDOT's website at <http://standardplans.dot.state.mn.us/>

Driveway and Sidewalk Details Standard Plans 5-297.254 can be found on MnDOT's website at <http://standardplans.dot.state.mn.us/>

MnDOT's 7000 series Standard Plates, which are approved standards drawings, provide information on standard details of construction and materials related to curbs, gutters, and sidewalks are on MnDOT's website at <http://standardplates.dot.state.mn.us/stdplate.aspx>

The MnDOT Facility Design Guide serves as a uniform design guide for engineers and technicians working on MnDOT projects. The document is available to others (such as Hennepin County) as a technical resource. Chapter 11 – Special Designs, includes information on the design of pedestrian facilities. The Road Design Manual can be found at (<http://roaddesign.dot.state.mn.us/roaddesign.aspx>)

MnDOT's Pedestrian Accommodations Through Work Zones webpage, <http://www.dot.state.mn.us/trafficeng/workzone/apr.html> contains information on providing accessibility during impacts due to maintenance or construction activities.

Design Procedures

Intersection Corners

The City of Mankato will attempt to construct or upgrade pedestrian curb ramps to be consistent with Access Board recommended designs parameters and MnDOT ADA design guidance and procedures to the extent feasible within all capital reconstruction projects. There may be limitations which make it technically infeasible for the City to achieve these goals at an intersection corner within the scope of any project. Those limitations will be noted and the intersection corners will be constructed to maximize accessibility to the extent feasible within the project scope. As future projects or opportunities arise, additional improvements at these locations may be incorporated into future projects. The City will strive to ensure that each intersection corner is constructed to be as accessible as possible.

Sidewalks / Trails

The City of Mankato will attempt to construct or upgrade sidewalks and trails to be consistent with Access Board recommended designs parameters, MnDOT ADA design guidance and procedures to the extent feasible within all capital improvement projects. There may be limitations which make it technically infeasible for the City to achieve these goals within all segments of sidewalks or trails within the scope of any project. Those limitations will be noted and those segments will be constructed to maximize accessibility to the extent feasible within the project scope. As future projects or opportunities arise, additional improvements at these locations may be incorporated into future projects. The City will strive to ensure that every sidewalk or trail is constructed to be as accessible as possible.

A low-angle photograph of the North Mankato Water Tower. The tower is a large, cylindrical structure with a white upper section and a dark lower section. The words "NORTH MANKATO" are painted in large, bold, black capital letters on the white section. To the right of the text is a green and white logo consisting of several triangular shapes arranged in a fan-like pattern. The tower is supported by a tall, fluted column. The sky is a clear, pale blue.

**NORTH
MANKATO**

Part 4 - City of North Mankato
ADA Transition Plan and Inventory

INTRODUCTION

The City of North Mankato is a partner agency of the Mankato/North Mankato Area Planning Organization (MAPO) and has completed a Self-Evaluation and developed an ADA Transition Plan as part of the overarching MAPO ADA Transition Plan effort. This “Part 4 – City of North Mankato ADA Transition Plan and Inventory” has been developed solely for the City of North Mankato and includes information, data, and recommendations relevant to the City’s interests and those of the MAPO. The City of North Mankato adopts “Part 1 – MAPO Partner Agency Requirements and Project Purpose” of the MAPO ADA Transition Plan and Inventory overarching document and associated appendices concurrent with the adoption of “Part 4 – City of North Mankato ADA Transition Plan and Inventory.”

This chapter accomplishes the following:

- Provides requirements mandated by ADA law for all agencies
- Introduces MAPO Partners
- Outlines public participation initiatives
- Provides the methodology used for agency Self-Evaluation
- Provides the methodology used for prioritization strategies for implementation.

PUBLIC OUTREACH

The following summarizes public outreach for the City of North Mankato:

- City Council Meetings: During the process, project staff were asked to discuss project initiatives with the City of North Mankato Council. Staff met with Council on December 4, 2023.
- Grievance Procedure: In compliance with 28 C.F.R. Sec. 35.107, the city has established the grievance procedure to receive future comments and concerns regarding barriers to accessibility. This can be seen in Appendix 2-E and is further detailed in Section VII below.
- Public Information Meetings: Project staff solicited feedback from the community on issues pertaining to ADA deficiencies within the community and initiatives for Transition Plan development while attending a public information meeting that took place on September 26, 2023. See Appendix 1-A for summaries of those meetings.
- City Website: A summary of comments received and detailed information regarding the public outreach activities are located in Appendix 2.

Review of Programs

In 2023, the City of North Mankato conducted an inventory of pedestrian facilities within its public rights-of-way consisting of the following facilities:

- Pedestrian Ramps at city road crossings that include trail or sidewalk facilities.
- Crosswalks
- Sidewalks
- Bus stops
- Pedestrian signals
- Crosswalks

There are 1085 pedestrian ramps and 707 sidewalk segments within North Mankato right-of-way. Of the 1085 pedestrian ramps, 492 are fully compliant. Of the 707 sidewalk segments, 579 are fully compliant.

City of North Mankato Self-Evaluation Infrastructure Data Collection Results		
Infrastructure Type	% Compliant	Summary
Pedestrian Ramps	45%	1085 total pedestrian ramps 492 (45%) are compliant
Sidewalks	82%	707 Sidewalk segments 579 segments of sidewalk/trail (82%) are compliant
Bus stops	27%	14 total bus stops 4 (27%) are compliant
Pedestrian Signals	35%	46 total pedestrian signals 30 (65%) are not accessible
Crosswalks	99%	465 crossings have marked crosswalks 99% of the crossings are compliant

Review of Policies and Practices

Previous Practices

Since the adoption of the ADA, the City of North Mankato has striven to provide accessible pedestrian features as part of street construction and reconstruction projects. As additional information was made available as to the methods of providing accessible pedestrian features, the City updated their procedures to accommodate these methods.

Policy

The City of North Mankato's goal is to continue to provide accessible pedestrian design features as part of street construction and reconstruction projects. The City will reference ADA design standards and procedures listed in Appendix 4-G. These standards and procedures provide the preferred standard for ADA compliance in Minnesota and will serve as the primary guidance for all future projects.

The City will consider and respond to all accessibility improvement requests. All accessibility improvements that have been deemed reasonable will be scheduled consistent with transportation priorities. The City will coordinate with external agencies to ensure that all new or altered pedestrian facilities within the City's jurisdiction are ADA compliant to the maximum extent feasible. Requests for accessibility improvements can be submitted to the City of North Mankato's ADA Coordinator. Contact information for ADA Coordinator is located in Appendix 4-F.

Maintenance of pedestrian facilities within the public rights-of-way will continue to follow the policies set forth by the City . A review of relevant policies can be seen in Appendix 4-B which includes the following:

- City of North Mankato Comprehensive Plan
- City of North Mankato Complete Streets Plan & Policy
- Pavement Management Plan
- Safe Routes to School Plan
- City of North Mankato Sidewalk Installation & Maintenance Policy
- City of City of North Mankato City Code

IMPLEMENTATION PLAN

Priority Areas

The City of North Mankato identified specific locations as priority areas for planned accessibility improvement projects based on criteria identified in Part 1-Section IV. These areas have been selected due to their proximity to specific land uses consistent with higher levels of pedestrian traffic, from the receipt of public comments, as well as areas exhibiting high levels of non-compliance. The priority areas as identified in the Self-Evaluation will be programmed into North Mankato's CIP as project needs arise and/or public preference dictates.

Additional priority will be given to any location where an improvement project or alteration was constructed after January 26, 1991, and accessibility features were omitted.

External Agency Coordination

Many other agencies are responsible for pedestrian facilities within the jurisdiction of the City of North Mankato. The City will coordinate with those agencies to track and assist in the facilitation of the elimination of accessibility barriers along their routes.

Schedule

The City of North Mankato will utilize two methods for upgrading pedestrian facilities to the current ADA standards. The first and most comprehensive of the two methods are the scheduled street and utility improvement projects. All pedestrian facilities impacted by these projects will be upgraded to current ADA accessibility standards. The second method is the stand alone sidewalk and ADA accessibility improvement project. These projects will be incorporated into the Capital Improvement Program (CIP) on a case by case basis as determined by the City of North Mankato staff. The City CIP, which includes a detailed schedule and budget for specific improvements, is included in Appendix 4-C.

The City anticipates allocating approximately \$120,000 per year toward ADA improvements identified in Appendix 4-A. Improvements have been identified as short-term improvements (2019-2028), mid-term improvements (2029-2038), and long-term improvements (2039 and later) for implementation based on the previously described prioritization process and annual budget constraints. The City anticipates the following implementation benchmarks:

- After 10 years, 26% of accessibility features identified in this plan would be ADA compliant. Including the highest priority locations.
- After 20 years, 52% of accessibility features identified in this plan would be ADA compliant.
- After 30 years, 78% of accessibility features identified in this plan would be ADA compliant.
- After 40 years, 100% of accessibility features identified in this plan would be ADA compliant.

Improvements will be coordinated with the City's annual budget, CIP, and long-term maintenance effort.

ADA COORDINATOR

In accordance with 28 C.F.R Sec. 35.107(a), the City of North Mankato has identified an ADA Title II Coordinator to oversee the City's policies and procedures. Contact information for this individual is located in Appendix 4-F.

GRIEVANCE PROCEDURE

Under the Americans with Disabilities Act, each agency is required to publish its responsibilities in regards to the ADA. If users of The City of North Mankato facilities and services believe the City has not provided reasonable accommodation, they have the right to file a grievance.

In accordance with 28 C.F.R. Sec. 35.107(b), the City has developed a grievance procedure for the purpose of the prompt and equitable resolution of citizens' complaints, concerns, comments, and other grievances. This draft of the public notice and the City of North Mankato's grievance procedure is outlined in Appendix 4-E.

MONITOR THE PROGRESS

This document will be updated as needed to reflect the City of North Mankato's approach to complying with ADA and providing accessible pedestrian infrastructure. The appendices in this document will be updated periodically to account for improvements, while the main body of the document will be updated within three to five years with a future update schedule to be developed at that time. With each main body update, a public comment period will be established to continue the public outreach.

Appendix 4-A: Self-Evaluation - Program Review

Appendix 4-A: Self-Evaluation – Program Review

Review of Programs

During Summer of 2018, the City of North Mankato inventoried pedestrian ramps and sidewalks within the public rights-of-way.

Pedestrian Ramps

The City of North Mankato has 1085 locations where pedestrian ramps exist or should exist within its public rights-of-way. These locations were inventoried for ADA compliance based on (1) whether a pedestrian ramp was present and (2) if compliance criteria outlined in Part 1 Sec. III were met. 492 (45%) of the locations were reported to be compliant.

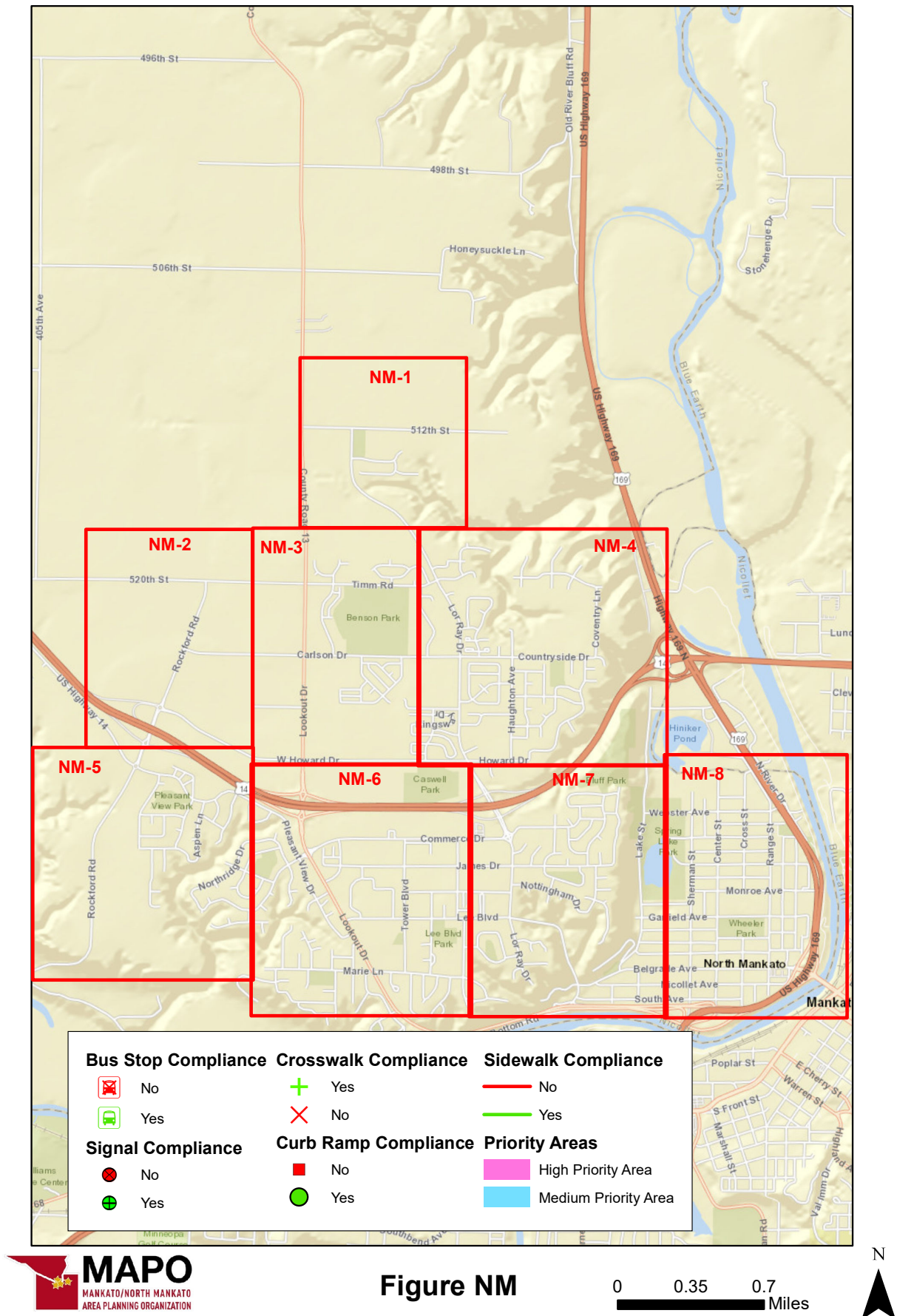
Sidewalks/Trails

The sidewalks and trails within the City of North Mankato public rights-of-way were inventoried and evaluated to determine existing compliance with ADA and to identify existing obstructions based on compliance criteria outlined in Part 1. Of the 707 sidewalk segments evaluated, 579 (82%) were reported to be compliant. Planning level remediation costs for sidewalks and barriers are included in Table 4-A.4.

Public Comment

No comments specific to North Mankato were received.

Compliant and non-compliant pedestrian infrastructure is illustrated in the following pages. The timeline for replacement of these sidewalks will depend on priority ranking, correlation to planned projects, reasonable accommodation requests, and available funding. A detailed list of these instances may be obtained upon request to the City of North Mankato ADA Coordinator (Appendix 4-F).



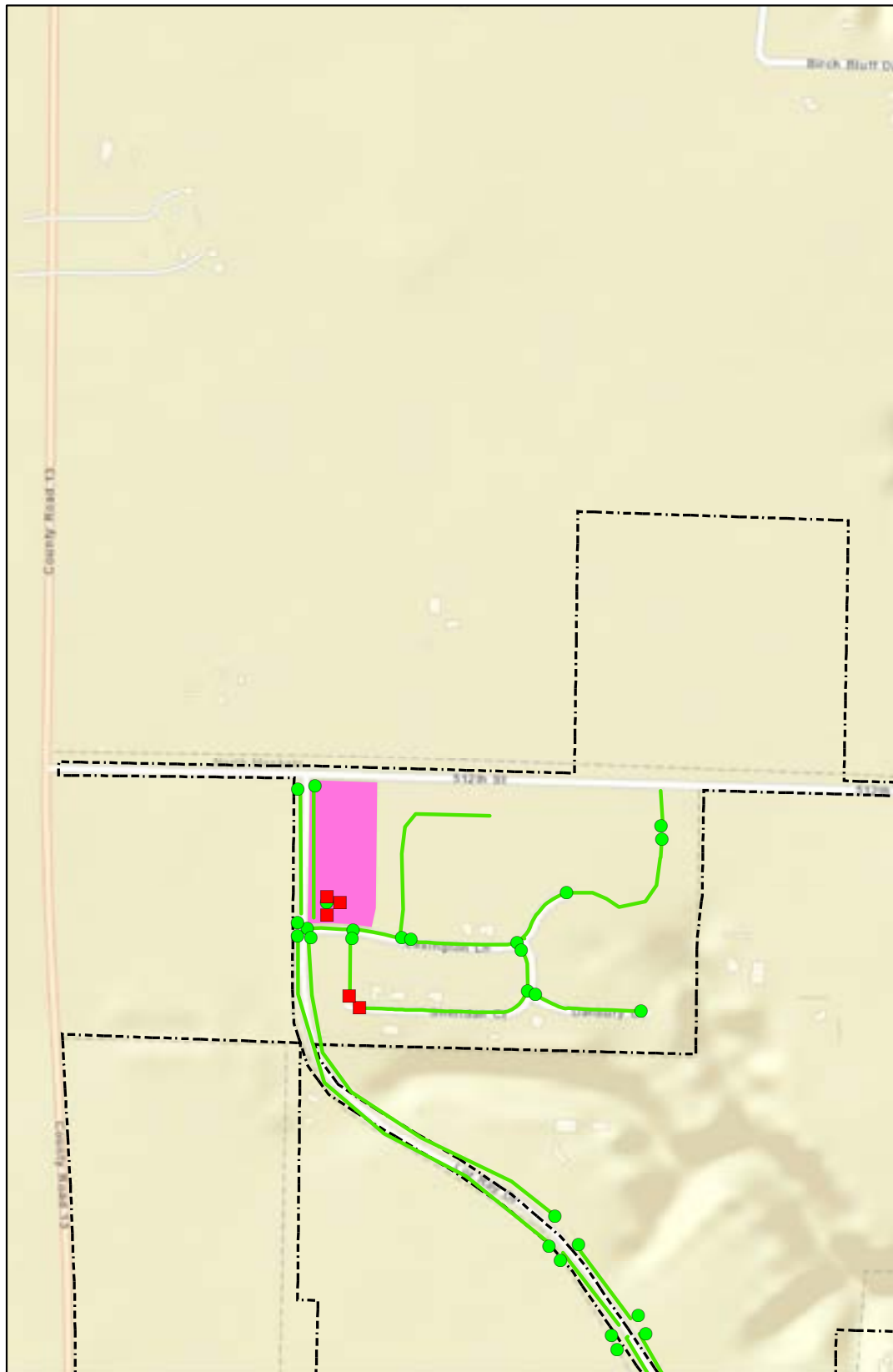


Figure NM-1





Figure NM-2

0 0.075 0.15 Miles



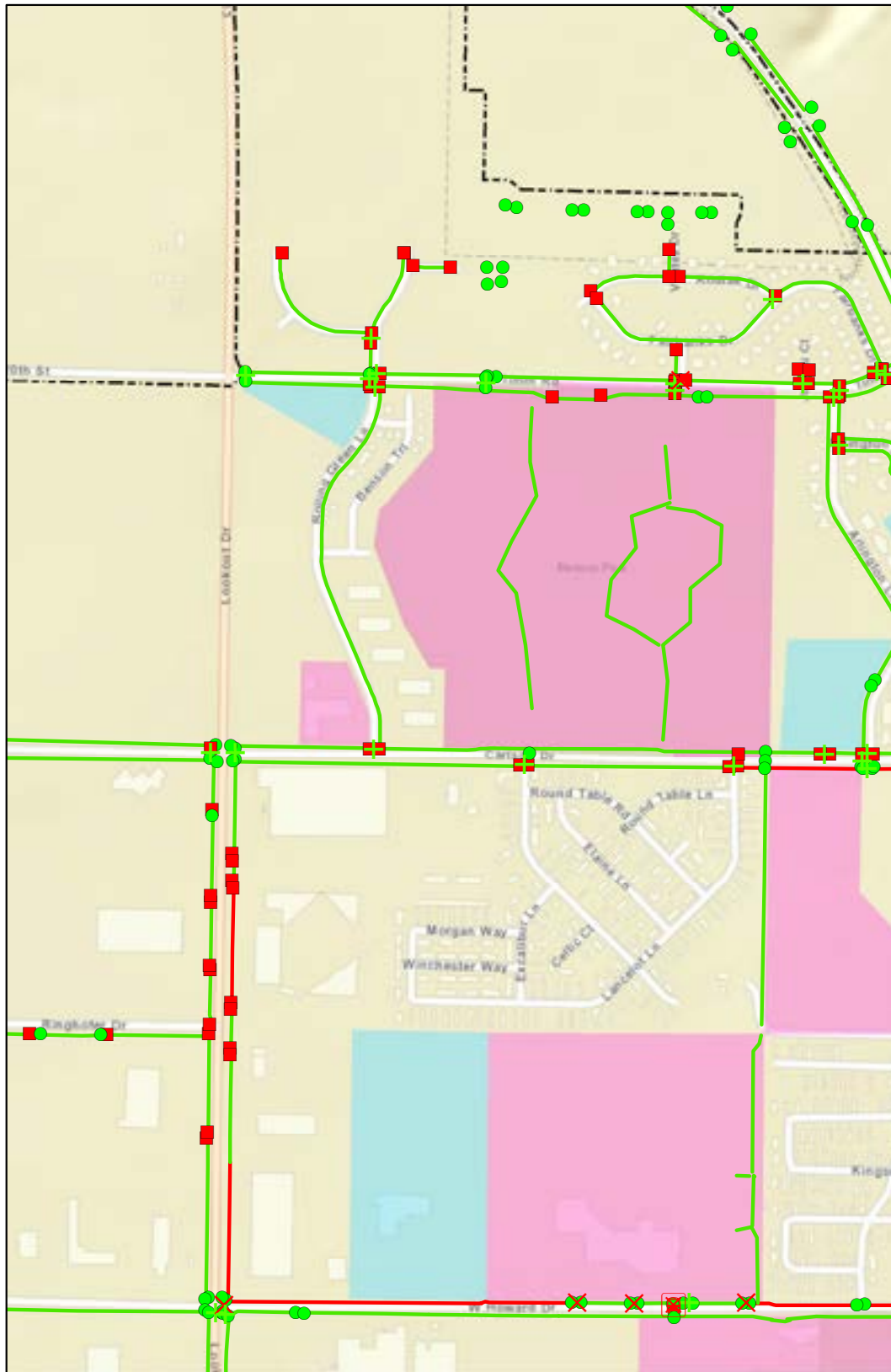


Figure NM-3

0 0.075 0.15
Miles





Figure NM-4

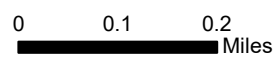
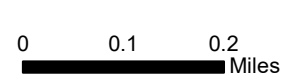




Figure NM-5



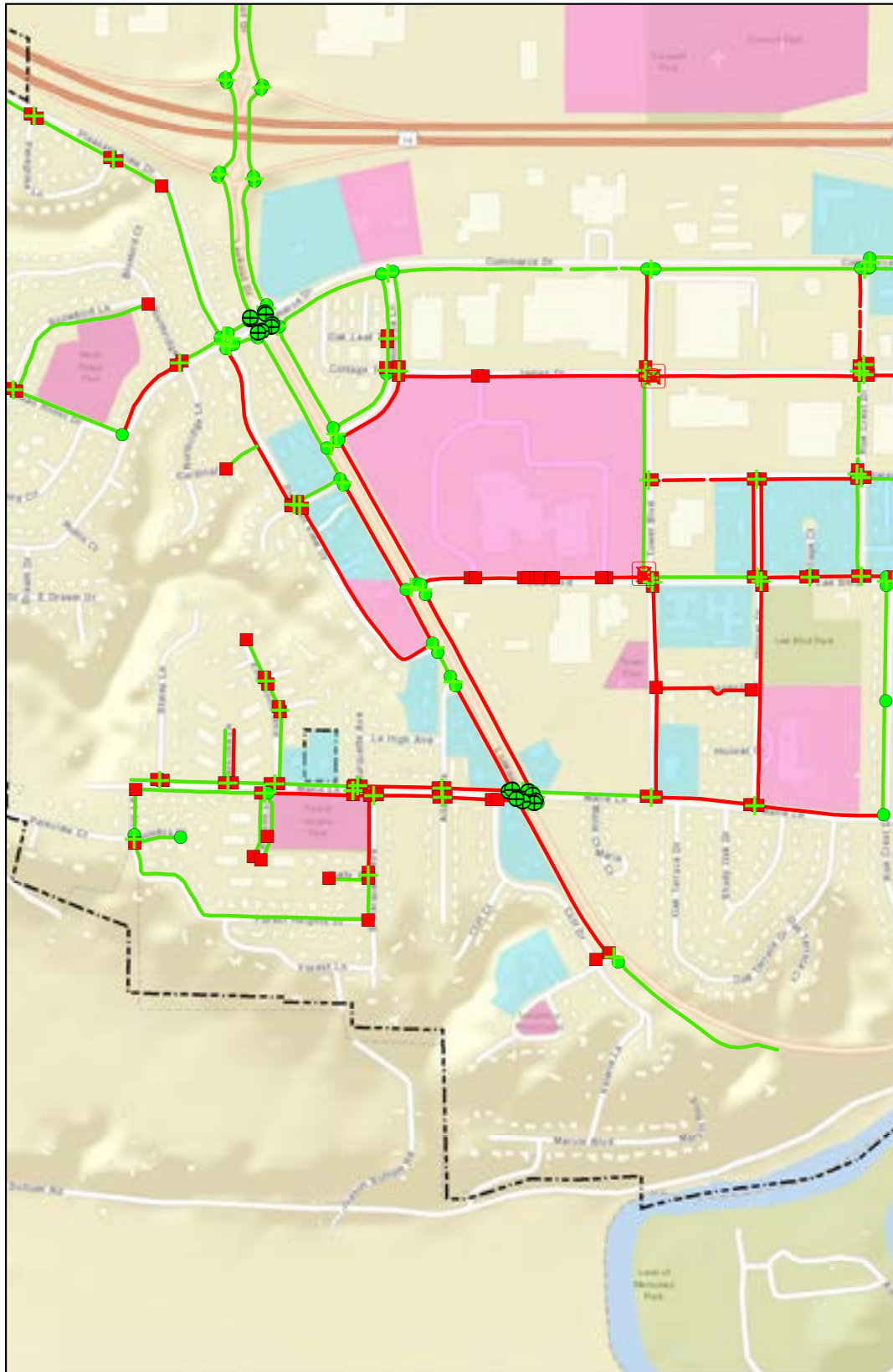
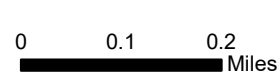


Figure NM-6



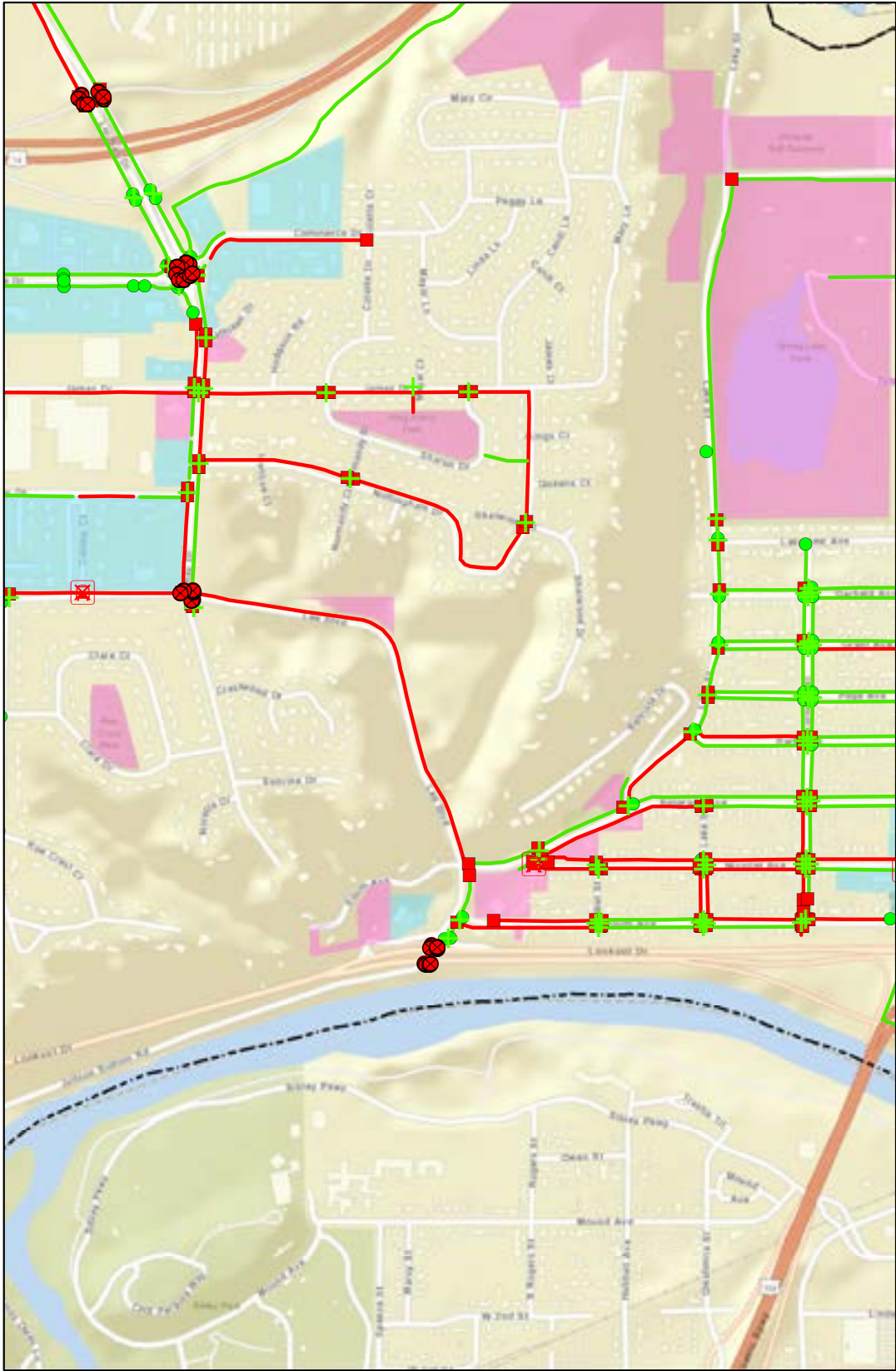
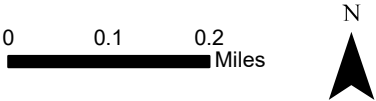


Figure NM-7



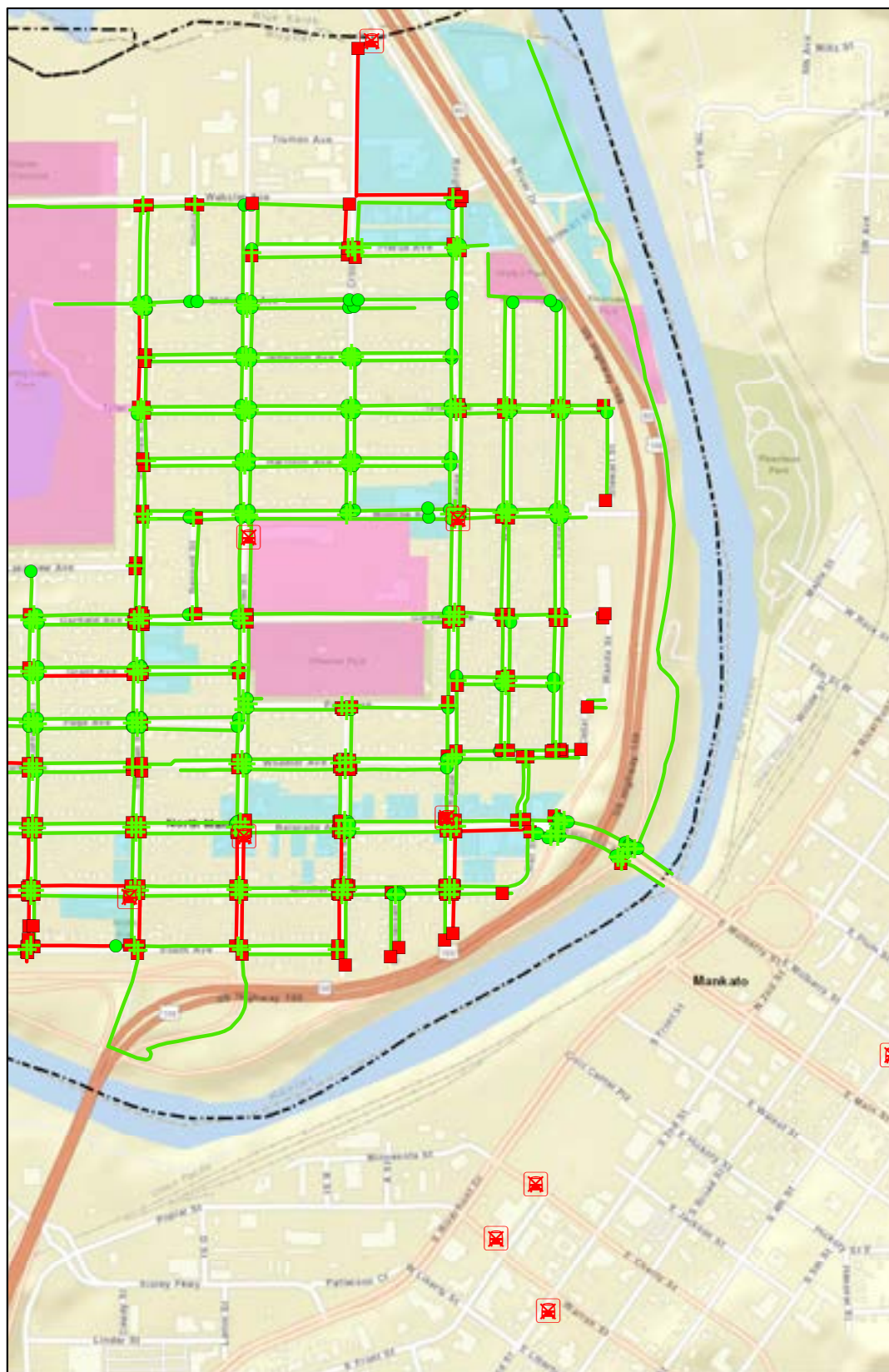
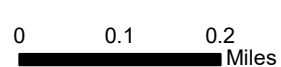


Figure NM-8



Appendix 4-B: Self-Evaluation - Policy and Practice Review

Appendix 4-B: Self-Evaluation – Policy and Practice Review

Review of Policies

The City's policies and practices include any City, department, or division policies and practices that direct staff in its daily work activities. Policies and practices that relate to accessibility and ADA conformance include:

The City of North Mankato Comprehensive Plan (2023):

Chapter 6 – Transportation

This chapter provides initiatives pertaining to the placement and size of sidewalks in the community. Sidewalks and/or trails are recommended to be adjacent to all Minor Arterial, Major Collector and Minor Collector roadways within the City. 8-foot wide bituminous or concrete trails or 6-foot wide bituminous or concrete sidewalks are recommended on either side of Minor Arterials and Major Collectors while 5-foot wide sidewalks are recommended on Minor Collectors. These recommendations are above the 4-foot minimum for sidewalk width required for ADA compliance.

Chapter 8 – Parks, Trails, and Recreation

Through this effort, the community expressed that safer and easier trail connections are desired. The chapter also suggests that each trail classification provides a certain type of recreational experience and value to pedestrians, bicyclists, in-line skaters, and wheelchair users.

Park Goals, Objectives, and Policies:

Policy 1.2.5 is to Provide all users an opportunity to participate in park activities by ensuring trails, buildings, fountains, etc. are ADA compliant and playgrounds include inclusive play equipment where feasible.

Trail System Goals, Objectives, and Policies:

Policy 1.1.1 is to ensure the quality standard for trails within the system is consistent with industry standards for safety, durability, and access.

Chapter 9 – Business District Redevelopment

This chapter discusses redevelopment/revitalization opportunities for each business district in the City and considers locations where future business districts are anticipated to grow in the future.

Policy 2.1.3 is to Adhere to the implementation plan identified in the North Mankato Americans with Disabilities Act (ADA) Transition Plan for the removal of obstructive barriers from the pedestrian realm.

Chapter 10 – Community Design

Chapter 10 references the ADA Transition Plan, stating, "The North Mankato ADA Transition Plan provides a framework for fixing existing sidewalk infrastructure ADA deficiencies and also best practices for how pedestrian facilities should be constructed to maintain compliance."

Policy Understanding and Recommended Revision:

These chapters all include reference to the ADA Transition Plan and how facilities should be constructed to maintain compliance. The narrative and policies in these chapters either imply that best design practices be followed or specifically mention that the City should construct infrastructure according to the ADA Transition Plan which defines best practices outlined in the Public Rights-of-Way Accessibility Guidelines (PROWAG) as adopted by MnDOT.

No barriers to accessibility were identified in this plan/policy.

The City of North Mankato Complete Streets Plan & Policy (2016):

This Plan and Policy identifies Complete Streets as a transportation policy and design approach that guides streets to be planned, designed, operated, and maintained to enable safe, convenient, and comfortable travel and access for users of all ages and abilities regardless of their mode of transportation.

The following policy language is included under design standards and maintenance according to the North Mankato Complete Streets Plan and Policy:

- The City Council or their designee will consider bicycle and pedestrian design in all streets construction, reconstruction, rehabilitation and pavement maintenance projects conducted by or behalf of the City, as appropriate, subject to the exceptions contained herein.
- The City shall plan, design, build and maintain all bicycle and pedestrian facilities in accordance with acceptable federal, state and local standards and guidelines, but will consider innovative and/or non-traditional design options as appropriate.

This Plan and Policy also provides facility design guidelines (specifically calling for 5-foot wide sidewalks in general and 8-foot sidewalks where buildings abut the walk) as well as crosswalk marking specifications.

Policy Understanding and Recommended Revision:

By adopting this policy, the City is stating that it will design facilities according to federal, state, and local standards and guidelines that will accommodate all users regardless of transportation mode.

No barriers to accessibility were identified in this plan/policy.

Pavement Management Plan (2014 & 2019 Update):

The goal of this report is to assist the City with understanding its current system condition, assist with management of these assets and provide recommendations for pavement management in the next 5 to 10 years.

This plan assigns condition ratings to streets to plan for improvements including seal coating, mill & overlay, and full depth reconstruction. The City has 67.1 miles of paved roads to manage. Several streets are identified for reconstruction and mill & overlay within the next five years. These projects should include ADA improvements where necessary as construction ensues.

Policy Understanding and Recommended Revision:

The following revisions to this Plan are recommended for inclusion during regular, scheduled plan/policy updates:

- Amend the Plan to include language considering adherence to ADA standards and guidance as outlined in the PROWAG and MnDOT for reconstruction.

City of North Mankato Safe Routes to School Plan (2015):

This plan illustrates planned facility improvements surrounding North Mankato Schools including Hoover Elementary School, Monroe Elementary School, Bridges (formerly Garfield) Elementary School, and the Dakota Meadows Middle School. Improvements include new sidewalk and trail facilities, sidewalk curb extensions

(bumpouts), and improvements to crosswalk visibility to facilitate safer pedestrian/bicycle travel to area schools.

Policy Understanding and Recommended Revision:

This plan outlines an ADA/Universal Design approach for facilities in the public rights-of-way to provide an environment that is equally accessible and comfortable for all users.

No barriers to accessibility were identified in this plan/policy.

City of North Mankato Sidewalk Installation & Maintenance Policy (2016)

The Sidewalk Installation & Maintenance Policy addresses installation, replacement, and maintenance for public sidewalks in the City, citing City Code that outlines City and property owner responsibilities regarding snow removal and physical condition of sidewalk. It provides a consistent inspection process for determining whether a particular sidewalk is in need of improvement and action to be taken if facilities are found to be non-compliant.

Policy Understanding and Recommended Revision:

While this policy provides a method for inspecting sidewalks that addresses several ADA compliance barriers, it makes no effort to discuss adherence to ADA compliance or reference to federal/state ADA design standards or guidelines. The policy also fails to include guidance for pedestrian ramps as part of sidewalk infrastructure.

The following revisions to this policy are recommended for inclusion during regular, scheduled policy updates:

- Amend the Sidewalk Installation and Maintenance Policy to include adherence to ADA standards and guidance as outlined in the PROWAG and MnDOT for reconstruction.
- Amend the Policy to include ADA design standards and guidance for pedestrian ramp construction.

The City of North Mankato City Code:

The City of North Mankato City Code provides several provisions dealing with sidewalk infrastructure including maintenance, responsibility of owner and occupant, failure to maintain, and specifications for the placement and construction of sidewalk.

Policy Understanding and Recommended Revision:

While the City Code provides actions for sidewalk installation and maintenance, it makes no effort to discuss adherence to ADA compliance or reference to federal/state ADA design standards or guidelines.

The following revisions to this policy are recommended for inclusion during regular, scheduled policy updates:

- Amend City Code provisions 90.026, 90.125, 90.126, and 155.46 to include adherence to ADA standards and guidance as outlined in the PROWAG and MnDOT for reconstruction.

Review of Practices

The City of North Mankato employs many formal and informal practices and methods related to the development, implementation, and maintenance of pedestrian infrastructure in public rights-of-way. These are as follows:

- Development – Typically plans that are submitted by consultants or designed by City staff are reviewed by various departments for compliancy on all levels to ensure all aspects of ADA compliance are met.

- Implementation – City staff inspects various types of construction type projects ensuring that they meet ADA requirements. Staff uses MNDOT ADA inspection checklists to ensure compliant pedestrian facilities within public rights-of-way.
- Maintenance – The City Sidewalk Replacement Program allows residents to make a formal complaint about non-compliant sidewalks for various reasons. This triggers the project to be put on a list for replacement and will generally be completed the following year unless immediate action is necessary.

Practice Recommendations

The general public made MAPO partners aware of some recent improvements to facilities that alleviated some ADA deficiencies while leaving adjacent facilities non-compliant. The following practices are recommended as part of this review, based on that feedback:

- Consider reconstructing all non-compliant pedestrian ramps at the same time at a given intersection when planning to reconstruct one. Pedestrian ramps function in unison at intersections to provide access to the PAR. Improving one while leaving the other(s) non-compliant does not remedy accessibility deficiencies nor lend to a fully functional and accessible PAR.
- Consider working with owners of properties generating high pedestrian traffic, such as apartments, when reconstructing adjacent pedestrian facilities in the public right-of-way. Creating owner awareness could entice owners to take necessary steps to ensure facilities extending from buildings on their property are ADA compliant and free of barriers to accessibility when connecting to the PAR.

Appendix 4-C: ADA Transition Plan Projects referenced from the City of North Mankato Capital Improvements Plan

Capital Improvements Plan (CIP) Projects That Include (Consider) Accessible Pedestrian Infrastructure

Community Investment Plan

The City of North Mankato's most recent CIP includes no programmed roadway improvement projects. However, there are roadway projects planned for the coming years that have received federal funding assistance. These projects will include improvements to ADA facilities. The projects are as follows:

CIP Area	Proposed Improvements	Year
Hoover Drive Safe Routes to School	Infrastructure	2024
Sherman Street (South to Monroe)	Infrastructure	2024
Cross Street (Monroe to Webster)	Infrastructure	2025
Page Avenue (Center to Range)	Infrastructure	2025
Quincy Street (McKinley to Webster)	Infrastructure	2025
Wheeler Ave (Cross to Range)	Infrastructure	2026
Garfield Ave (Center to Range)	Infrastructure	2026
Haughton Ave (Countryside to Howard)	Infrastructure	2027
Somerset Ln Improvements	Infrastructure	2028

State Transportation Improvement Program

The City of Mankato has several transportation projects scheduled in the State Transportation Improvement Program (STIP). Some of these projects are included in the CIP while others are not. Those projects not listed in the CIP are listed below.

STIP Area	Proposed Improvements	Year
Lor Ray Dr and Howard Drive	Roundabout	2023
Local Streets	Hoover Elementary Pedestrian and Trail Improvements	2024

The City will continue to implement infrastructure and maintenance improvements as part of its long-range community investment planning and pavement management plan. With these efforts, the City will incorporate ADA-compliant pedestrian facilities and complete accessible infrastructure improvements as needed to ensure access for all users.

Appendix 4-D: Public Outreach Results

Public Outreach Results

Input from the community has been gathered and used to help define priority areas for improvements within the City of North Mankato public rights-of-way.

Public outreach for the creation of this document consisted of the following activities:

Public Open House

MAPO agencies held one public open house to gather input on the state of pedestrian infrastructure in each jurisdiction and priority preferences for projects moving forward.

All stakeholders within MAPO jurisdictions were invited to attend a public information meeting on September 26, 2023 at the Mankato Intergovernmental Center to receive information on the project and provide their feedback on the process and help project staff identify locations that pose barriers to accessibility.

Project Website

A grievance procedure was also available on the site in which the general public could file an electronic grievance, placing comments directly on an interactive map for the city to include in the results of the Self-Evaluation. There were no comments received through this application.

Appendix 4-E: Grievance Procedure

ADA Grievance Procedure

In accordance with 28 CFR 35.107(b), the City has developed the following ADA grievance procedure for the purpose of the prompt and equitable resolution of citizens' complaints, concerns, comments, and other grievances.

The City understands that members of the public may desire to contact staff to discuss ADA issues without filing a formal grievance. Members of the public wishing to contact the ADA Coordinator should reference the contact information in Appendix 4-F. Contacting staff to informally discuss ADA issues is welcome and does not limit a person's ability or right to file a formal grievance later.

Those wishing to file a formal written grievance with the City of North Mankato may do so by one of the following methods:

Telephone

Contact the City of North Mankato's ADA Coordinator listed in the Contact Information section of Appendix 4-F to submit an oral grievance. The staff person will use the internet to electronically submit the grievance on behalf of the person filing it.

Paper Submission

A paper copy of the City's grievance form is available by request from the City of North Mankato's ADA Coordinator (contact information in Appendix 4-F). Complete the form and submit it to the City of North Mankato ADA Coordinator at the address listed.

The City of will acknowledge receipt of the grievance to the citizen within 10 working days of the submission. City staff will then provide a response or resolution to the grievance or will provide information on when the citizen can expect a response. If the grievance filed does not fall within the City of North Mankato's jurisdiction, staff will work with the citizen to contact the agency with jurisdiction.

When possible (typically within 60 calendar days or less of the grievance submission) City staff will conduct an investigation to determine the validity of the alleged violation. As a part of the investigation, internal staff will be consulted to fully understand the complaint and possible solutions. The City of North Mankato staff will contact the citizen to discuss the investigation and proposed resolution.

The City of North Mankato will consider all grievances within its particular context or setting. Furthermore, the department will consider many varying circumstances including: access to applicable services, programs, or facilities; the nature of the disability; essential eligibility requirements for participation; health and safety of others; and degree to which a potential solution would constitute a fundamental alteration to the program, service, or facility, or cause undue hardship to the City of North Mankato.

Accordingly, the resolution by The City of North Mankato of any one grievance does not constitute a precedent upon which the City is bound or upon which other complaining parties may rely.

Complaints of Title II violations may be filed with the Department of Justice (DOJ) within 180 days of the date of discrimination. In certain situations, cases may be referred to a mediation program sponsored by the DOJ. The DOJ may bring a lawsuit where it has investigated a matter and has been unable to resolve violations.

For more information, contact:

U.S. Department of Justice Civil Rights Division
950 Pennsylvania Avenue, N.W. Disability Rights Section – NYAV
Washington, D.C. 20530 www.ada.gov
(800) 514-0301 (voice)
(800) 514-0383 (TTY)

Title II may also be enforced through private lawsuits in Federal court. It is not necessary to file a complaint with the DOJ or any other Federal agency, or to receive a “right-to-sue” letter, before going to court.

File Retention

The City of North Mankato shall maintain ADA grievance files on behalf of the City for a period of seven years.

City of North Mankato, MN Grievance Form

Instructions: Please fill out this form completely and submit to:

City of North Mankato ADA Coordinator
1001 Belgrade Avenue
P.O. Box 2055
North Mankato, MN 56002-2055

Or it can be emailed to the ADA coordinator at MLassonde@northankato.com

Complainant - person filing grievance:

Name: _____ Date: _____

Address: _____ City, State, Zip Code: _____

Home: _____ Cell: _____

Work: _____ Email: _____

Representing - person claiming an accessibility issue or alleging an ADA violation (if not the complainant):

Name: _____ Date: _____

Address: _____ City, State, Zip Code: _____

Home: _____ Cell: _____

Work: _____ Email: _____

Description and location of the alleged violation and the nature of a remedy sought.

If the complainant has filed the same complaint or grievance with the United States Department of Justice (DOJ), another federal or state civil rights agency, a court, or others, the **name of the agency or court where the complainant filed it and the filing date**.

Agency or Court: _____ Contact Person: _____

Address: _____ City, State, Zip Code: _____

Phone Number: _____ Date Filed: _____

Appendix 4-F: Contact Information

Responsible Officials and Key Staff

Responsible Officials Contact Information

City of North Mankato ADA Coordinator:

Matt Lassonde, City of North Mankato, City Planner

1001 Belgrade Avenue

P.O. Box 2055

North Mankato, MN 56002-2055

P: (507) 514-6456

E: MLassonde@northankato.com

Appendix 4-G: ADA Design Standards and Procedures

ADA Design Standards and Procedures

Design Standards

Public Rights-of-Way Accessibility Guidelines

Public Rights-of-Way Accessibility Guidelines (PROWAG), developed by the Access Board, are draft guidelines that address accessibility in the public rights-of-way. Sidewalks, street crossings, and other elements of the public rights-of-way present unique challenges to accessibility for which specific guidance is considered essential. The Access Board is developing these guidelines that will address various issues, including access for visually impaired pedestrians at street crossings, wheelchair access to on-street parking, and various constraints posed by space limitations, roadway design practices, slope, and terrain. PROWAG can be found at <http://www.access-board.gov/attachments/article/743/nprm.pdf>.

In 2010 and 2015, as a part of the development of MnDOT's Transition Plan, MnDOT Issued Technical Memorandum 10-02-TR-01 Adoption of Public Rights of way Accessibility Guidance and Technical Memorandum No. 15--02-TR-01 Adoption of Public Rights-of -Way Accessibility Guidance (PROWAG), respectively to their staff, cities, and counties. These memorandums, which have both expired, make the PROWAG the primary guidance for accessible facility design on MnDOT projects. In addition, these technical memorandums can be found on MnDOT's website. See (<http://techmemos.dot.state.mn.us/>).

Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way

The Access Board is proposing these accessibility guidelines for the design, construction, and alteration of pedestrian facilities in the public right-of-way. The guidelines ensure that sidewalks, pedestrian street crossings, pedestrian signals, and other facilities for pedestrian circulation and use constructed or altered in the public right-of-way by state and local governments are readily accessible for pedestrians with disabilities. When the guidelines are adopted, with or without additions and modifications, as accessibility standards in regulations issued by other federal agencies implementing the ADA, Section 504 of the Rehabilitation Act, and the Architectural Barriers Act, compliance with these accessibility standards is mandatory. These proposed accessibility guidelines can be found on the Access Board website (<http://www.access-board.gov>) under Public Rights-of-Way or at <http://www.access-board.gov/attachments/article/743/nprm.pdf>.

Accessible Public Rights-of-Way Planning and Design for Alterations (August 2007)

This report and its recommendations are the work of the Public Rights-of-Way Access Advisory Committee (PROWAAC) – Subcommittee on Technical Assistance and are intended to provide technical assistance only. The report is not a rule and has no legal effect. It has not been endorsed by the U.S. Access Board, the Department of Justice, or the Federal Highway Administration of the Department of Transportation. Still it can be a technical advisory source for engineers and technicians who are planning and designing for alterations to pedestrian elements. This document is on the Access Board website (<http://www.access-board.gov>) or at <http://www.access-board.gov/attachments/article/756/guide.pdf>.

Minnesota Department of Transportation

Building on the adoption of PROWAG as planning and design guidance for accessible pedestrian facilities, MnDOT has developed additional planning, design, and construction guidance that is available to local agencies. Listed below is information on additional design guidance available. This is not intended to be an exclusive or comprehensive list of ADA guidance, but rather an acknowledgement of guidance staff should consider and a starting point for information on providing accessible pedestrian facilities.

The MnDOT Accessibility webpage, which has good information in a variety of subject areas related to ADA and accessibility, can be found at <http://www.dot.state.mn.us/ada/index.html>. The webpage also provides the ability to sign up for ADA policy and design training classes when available and to review material from

previous trainings.

Curb Ramp Guidelines: <http://www.dot.state.mn.us/ada/pdf/curbramp.pdf>

ADA Project Design Guide Memo: <http://www.dot.state.mn.us/ada/pdf/adaprojectdesignguidememo.pdf>
ADA Project Design Guide: <http://www.dot.state.mn.us/ada/pdf/adaprojectdesignguide.pdf>

Pedestrian Curb Ramp Details Standard Plans 5-297.250 can be found on MnDOT's website at <http://standardplans.dot.state.mn.us/>

Driveway and Sidewalk Details Standard Plans 5-297.254 can be found on MnDOT's website at <http://standardplans.dot.state.mn.us/>

MnDOT's 7000 series Standard Plates, which are approved standards drawings, provide information on standard details of construction and materials related to curbs, gutters, and sidewalks are on MnDOT's website at <http://standardplates.dot.state.mn.us/stdplate.aspx>

The MnDOT Facility Design Guide serves as a uniform design guide for engineers and technicians working on MnDOT projects. The document is available to others (such as Hennepin County) as a technical resource. Chapter 11 – Special Designs, includes information on the design of pedestrian facilities. The Road Design Manual can be found at (<http://roaddesign.dot.state.mn.us/roaddesign.aspx>)

MnDOT's Pedestrian Accommodations Through Work Zones webpage, <http://www.dot.state.mn.us/trafficeng/workzone/apr.html> contains information on providing accessibility during impacts due to maintenance or construction activities.

Design Procedures

Intersection Corners

The City of North Mankato will attempt to construct or upgrade pedestrian curb ramps to be consistent with Access Board recommended designs parameters and MnDOT ADA design guidance and procedures to the extent feasible within all capital reconstruction projects. There may be limitations which make it technically infeasible for the City to achieve these goals at an intersection corner within the scope of any project. Those limitations will be noted and the intersection corners will be constructed to maximize accessibility to the extent feasible within the project scope. As future projects or opportunities arise, additional improvements at these locations may be incorporated into future projects. The City will strive to ensure that each intersection corner is constructed to be as accessible as possible.

Sidewalks / Trails

The City of North Mankato will attempt to construct or upgrade sidewalks and trails to be consistent with Access Board recommended designs parameters, MnDOT ADA design guidance and procedures to the extent feasible within all capital improvement projects. There may be limitations which make it technically infeasible for the City to achieve these goals within all segments of sidewalks or trails within the scope of any project. Those limitations will be noted and those segments will be constructed to maximize accessibility to the extent feasible within the project scope. As future projects or opportunities arise, additional improvements at these locations may be incorporated into future projects. The City will strive to ensure that every sidewalk or trail is constructed to be as accessible as possible.



Part 5 - City of Skyline
ADA Transition Plan and Inventory



INTRODUCTION

The City of Skyline is a partner agency of the Mankato/North Mankato Area Planning Organization and has pursued the completion of a Self-Evaluation and the development of an ADA Transition Plan as part of the overarching MAPO ADA Transition Plan effort. Skyline is a small city and contains no pedestrian infrastructure as part of its transportation system. Efforts to provide a full evaluation of Skyline suitable to develop a Transition Plan are futile. This plan serves as a framework for a future Skyline ADA Transition Plan in the event that pedestrian infrastructure is constructed in the coming years.

This “Part 5 – City of Skyline ADA Transition Plan and Inventory” has been developed solely for the City of Skyline and includes information, data, and recommendations relevant to the city’s interests and those of the MAPO. Upon adoption of “Part 5 – City of Skyline ADA Transition Plan and Inventory,” the City of Skyline also adopts “Part 1 – MAPO Partner Agency Requirements and Project Purpose” of the MAPO ADA Transition Plan and Inventory overarching document and associated appendices.

This chapter accomplishes the following:

- Provides requirements mandated by ADA law for all agencies
- Introduces MAPO Partners
- Outlines public participation initiatives
- Provides the methodology used for agency Self-Evaluation
- Provides the methodology used for prioritization strategies for implementation.

PUBLIC OUTREACH

The following summarizes public outreach for the City of Skyline:

- Grievance Procedure: In compliance with 28 C.F.R. Sec. 35.107, the city has established the grievance procedure to receive future comments and concerns regarding barriers to accessibility. This can be seen in Appendix 2-E and is further detailed in Section VII below.
- Public Information Meetings: Project staff solicited feedback from the community on issues pertaining to ADA deficiencies within the community and initiatives for Transition Plan development while attending a public information meeting that took place on September 26, 2023. See Appendix 1-A for summaries of those meetings.
- City Website: A summary of comments received and detailed information regarding the public outreach activities are located in Appendix 2-D.

Review of Programs

The City of Skyline has no pedestrian infrastructure. However, if the city decides to integrate sidewalks and other pedestrian infrastructure into its public rights-of-way at a future date, they will fully comply with ADA law at the time of construction to provide full accessibility to all users. The only pedestrian walk in the City is located on the City Hall/Fire Station property as access from parking to the building. As a city with less than 50 employees, Skyline is not required to have a Transition Plan in place. With no pedestrian infrastructure, Self-Evaluation of infrastructure is impossible. There are no policies or practices providing barriers to accessibility.

Review of Policies and Practices

The City of Skyline has no policies nor performs practices that provide barriers to Compliance with the ADA. However, if the city decides to integrate sidewalks and other pedestrian infrastructure into its public rights-of-way at a future date, they will fully comply with ADA law at the time of construction to provide full accessibility to all users.

IMPLEMENTATION PLAN

If the City chooses to incorporate pedestrian infrastructure in the future, it will do so in a way that ensures access for all users in compliance with ADA law.

ADA COORDINATOR

In accordance with 28 C.F.R. Sec. 35.107(a), the City of Skyline has identified an ADA Title II Coordinator to oversee the city's policies and procedures. Contact information for this individual is located in Appendix 5-A.

GRIEVANCE PROCEDURE

Under the Americans with Disabilities Act, each agency is required to publish its responsibilities in regards to the ADA. A draft of this public notice will be provided if pedestrian infrastructure is constructed in accordance with 28 CFR 35.107(b).

MONITOR THE PROGRESS

This document will be updated as needed to reflect the City of Skyline's approach to complying with ADA and providing accessible pedestrian infrastructure. The appendices in this document will be updated periodically to account for improvements, while the main body of the document will be updated within ten years with a future update schedule to be developed at that time. With each main body update, a public comment period will be established to continue the public outreach.

Appendix 5-A: Responsible Officials and Key Staff

Responsible Officials and Key Staff

Responsible Officials Contact Information

City of Skyline ADA Coordinator:

Paige Attarian, City of Skyline

164 S Skyline Dr.

Skyline, MN 56001

P: (507) 345-5390

E: mayor@cityofskyline.com



Part 6 - Blue Earth County
ADA Transition Plan and Inventory



INTRODUCTION

Blue Earth County is a partner agency of the Mankato/North Mankato Area Planning Organization (MAPO) and has completed a Self-Evaluation and developed an ADA Transition Plan as part of the overarching MAPO ADA Transition Plan effort. This “Part 6 – Blue Earth County ADA Transition Plan and Inventory” has been developed solely for Blue Earth County and includes information, data, and recommendations relevant to the County’s interests and those of the MAPO. Blue Earth County adopts “Part 1 – MAPO Partner Agency Requirements and Project Purpose” of the MAPO ADA Transition Plan and Inventory overarching document and associated appendices concurrent with the adoption of “Part 6 – Blue Earth County ADA Transition Plan and Inventory.”

This chapter accomplishes the following:

- Provides requirements mandated by ADA law for all agencies
- Introduces MAPO Partners
- Outlines public participation initiatives
- Provides the methodology used for agency Self-Evaluation
- Provides the methodology used for prioritization strategies for implementation.

PUBLIC OUTREACH

The following summarizes public outreach for the Blue Earth County

- Board Presentation: During in the process, project staff were asked to discuss project initiatives with the County Board on November 14, 2023.
- Grievance Procedure: In compliance with 28 C.F.R. Sec. 35.107, the city has established the grievance procedure to receive future comments and concerns regarding barriers to accessibility. This can be seen in Appendix 2-E and is further detailed in Section VII below.
- Public Information Meetings: Project staff solicited feedback from the community on issues pertaining to ADA deficiencies within the community and initiatives for Transition Plan development while attending a public information meeting that took place on September 26, 2023. See Appendix 1-A for summaries of those meetings.
- County Website: A summary of comments received and detailed information regarding the public outreach activities are located in Appendix 2- D.

Review of Programs

In 2023, the Blue Earth County conducted an inventory of pedestrian facilities within its public rights-of-way consisting of the following facilities:

- Pedestrian Ramps at city road crossings that include trail or sidewalk facilities.
- Crosswalks
- Sidewalks
- Pedestrian signals
- Crosswalks

There are 856 pedestrian ramps and 441 sidewalk segments within Blue Earth right-of-way. Of the 856 pedestrian ramps, 447 are fully compliant. Of the 441 sidewalk segments, 383 are fully compliant.

Blue Earth County Self-Evaluation Infrastructure Data Collection Results		
Infrastructure Type	% Compliant	Summary
Pedestrian Ramps	52%	856 total pedestrian ramps 447 (52%) are compliant
Sidewalks	87%	441Sidewalk segments 383 segments of sidewalk/trail (87%) are compliant
Pedestrian Signals	77%	90 total signals 69 (77%) are accessible
Crosswalks	100%	86 crosswalks were evaluated 86 (100%) were compliant

Review of Policies and Practices

Previous Practices

Since the adoption of the ADA, Blue Earth County has worked to provide accessible pedestrian features as part of road construction and reconstruction projects. As additional information was made available as to the methods of providing accessible pedestrian features, the county updated their procedures to accommodate these methods.

Policy

Blue Earth County's goal is to continue to provide accessible pedestrian design features as part of street construction and reconstruction projects. The county will reference ADA design standards and procedures listed in Appendix 6-G. These standards and procedures provide the preferred standard for ADA compliance in Minnesota and will serve as the primary guidance for all future projects.

The county will consider and respond to all accessibility improvement requests. All accessibility improvements that have been deemed reasonable will be scheduled consistent with transportation priorities. The county will coordinate with external agencies to ensure that all new or altered pedestrian facilities within the county's jurisdiction are ADA compliant to the maximum extent feasible. Requests for accessibility improvements can be submitted to Blue Earth County's ADA Coordinator. Contact information for ADA Coordinator is located in Appendix 6-F.

Maintenance of pedestrian facilities within the public rights-of-way will continue to follow the policies set forth by the county. A breakdown of relevant policies can be seen in Appendix 6-B which includes the following:

- Blue Earth County Snow and Ice Removal Policy
- Highway Department Policies – Sidewalks/Trails
- County of Blue Earth and City of Mankato Routine Maintenance Agreement (2023)
- Routine Maintenance Agreements with Cities in the County

IMPLEMENTATION PLAN

Priority Areas

Blue Earth County identified specific locations as priority areas for planned accessibility improvement projects based on criteria identified in Part 1-Section IV. These areas have been selected due to their proximity to specific land uses consistent with higher levels of pedestrian traffic, from the receipt of public comments, as well as areas exhibiting high levels of non-compliance.

Additional priority will be given to any location where an improvement project or alteration was constructed after January 26, 1991, and accessibility features were omitted.

External Agency Coordination

Much of the sidewalk and trail infrastructure in Blue Earth County is contained within the local jurisdictions identified in section III. Blue Earth County maintains agreements with municipalities to share the costs associated with sidewalk and trail facilities on County Highways. Cities are responsible for participating in ADA improvements in accordance with these cost share agreements. Through this effort, the cities of Eagle Lake and Mankato have prioritized deficiencies identified in this plan within their respective ADA Transition Plans in accordance with their agreements with Blue Earth County.

The County will coordinate with cities within its jurisdiction to track and assist in the facilitation of the elimination of accessibility barriers along their routes.

Schedule

Blue Earth County will utilize two methods for upgrading pedestrian facilities to the current ADA standards. The first and most comprehensive of the two methods are the scheduled street and utility improvement projects. All pedestrian facilities impacted by these projects will be upgraded to current ADA accessibility standards. The second method is the stand alone sidewalk and ADA accessibility improvement project. These projects will be incorporated into the Capital Improvement Program (CIP) on a case by case basis as determined by Blue Earth County staff. The County CIP, which includes a detailed schedule and budget for specific improvements, is included in Appendix 6-C.

Blue Earth County will work with cities in its jurisdiction to program improvements into respective Capital Improvement Projects. Improvements will be coordinated with each city's annual budget and 5-year Capital Improvements Plan, and long-term maintenance efforts.

ADA COORDINATOR

In accordance with 28 C.F.R Sec. 35.107(a), Blue Earth County has identified an ADA Title II Coordinator to oversee The County's policies and procedures. Contact information for this individual is located in Appendix 6-F.

GRIEVANCE PROCEDURE

Under the Americans with Disabilities Act, each agency is required to publish its responsibilities in regards to the ADA. If users of Blue Earth County facilities and services believe the County has not provided reasonable accommodation, they have the right to file a grievance.

In accordance with 28 C.F.R. Sec. 35.107(b), the county has developed a grievance procedure for the purpose of the prompt and equitable resolution of citizens' complaints, concerns, comments, and other grievances. This draft of the public notice and Blue Earth County's grievance procedure is outlined in Appendix 6-E.

MONITOR THE PROGRESS

This document will be updated as needed to reflect Blue Earth County's approach to complying with ADA and providing accessible pedestrian infrastructure. The appendices in this document will be updated periodically to account for improvements, while the main body of the document will be updated within three to five years with a future update schedule to be developed at that time. With each main body update, a public comment period will be established to continue the public outreach.

Appendix 6-A: Self-Evaluation - Program Review

Appendix 6-A: Self-Evaluation – Program Review

Review of Programs

During Summer of 2023, Blue Earth County inventoried pedestrian ramps and sidewalks within the public rights-of-way.

Pedestrian Ramps

Blue Earth County has 856 locations where pedestrian ramps exist or should exist within its public rights-of-way. These locations were inventoried for ADA compliance based on (1) whether a pedestrian ramp was present and (2) if compliance criteria outlined in Part 1 Sec. III were met. 447 (52%) of the locations were reported to be compliant.

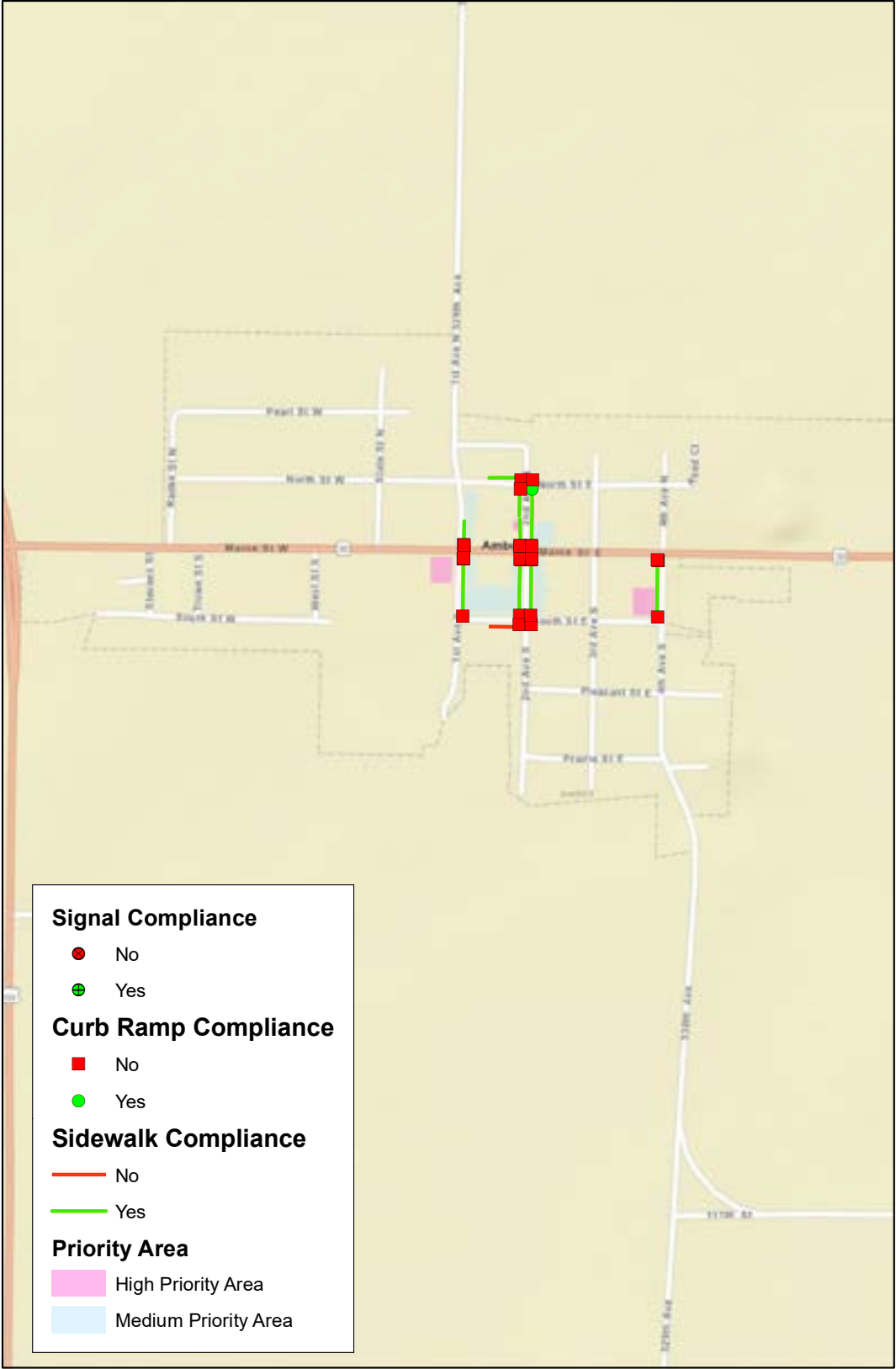
Sidewalks/Trails

The sidewalks and trails within the County public rights-of-way were inventoried and evaluated to determine existing compliance with ADA and to identify existing obstructions based on compliance criteria outlined in Part 1. Of the 441 sidewalk segments evaluated, 383 (87%) were reported to be compliant. Planning level remediation costs for sidewalks and barriers are included in Table 6-A.4.

Public Comment

No comments specific to Blue Earth County were received.

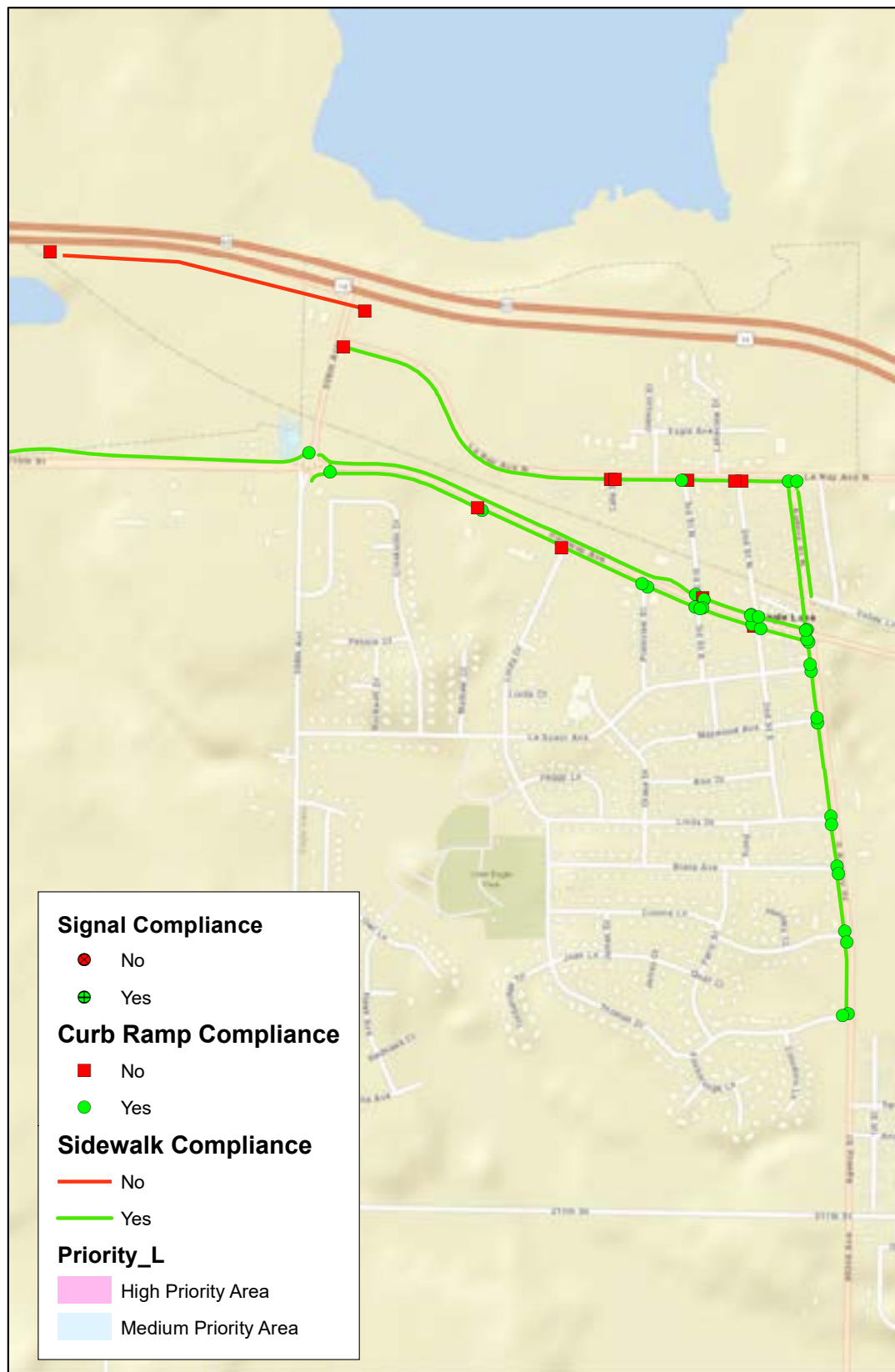
Compliant and non-compliant pedestrian infrastructure is illustrated in the follow pages. The timeline for replacement of these sidewalks will depend on priority ranking, correlation to planned projects, reasonable accommodation requests, and available funding. A detailed list of these instances may be obtained upon request to the Blue Earth County ADA Coordinator (Appendix 6-F).



City of Amboy

0 0.075 0.15 Miles

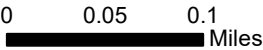


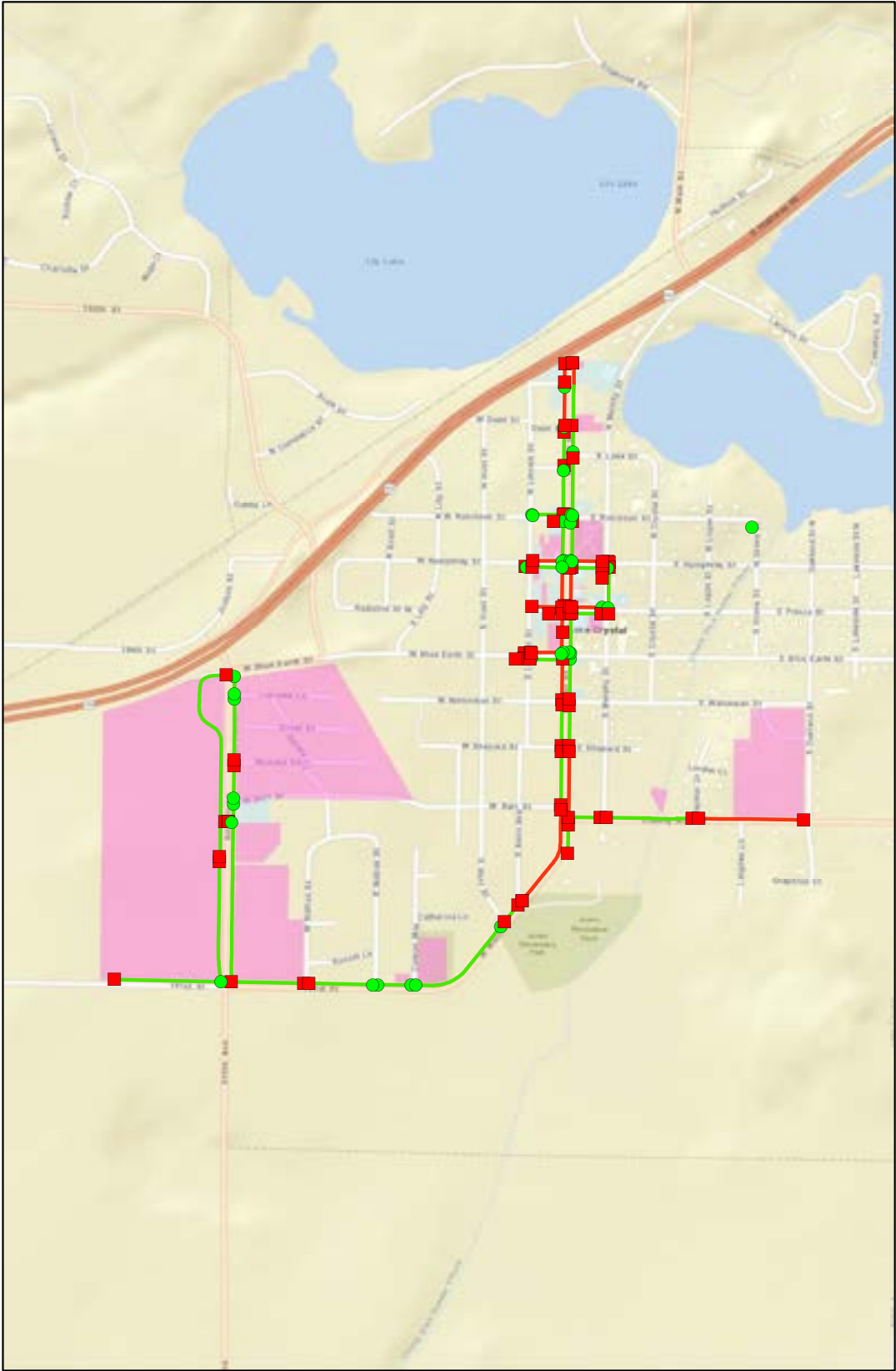






Good Thunder

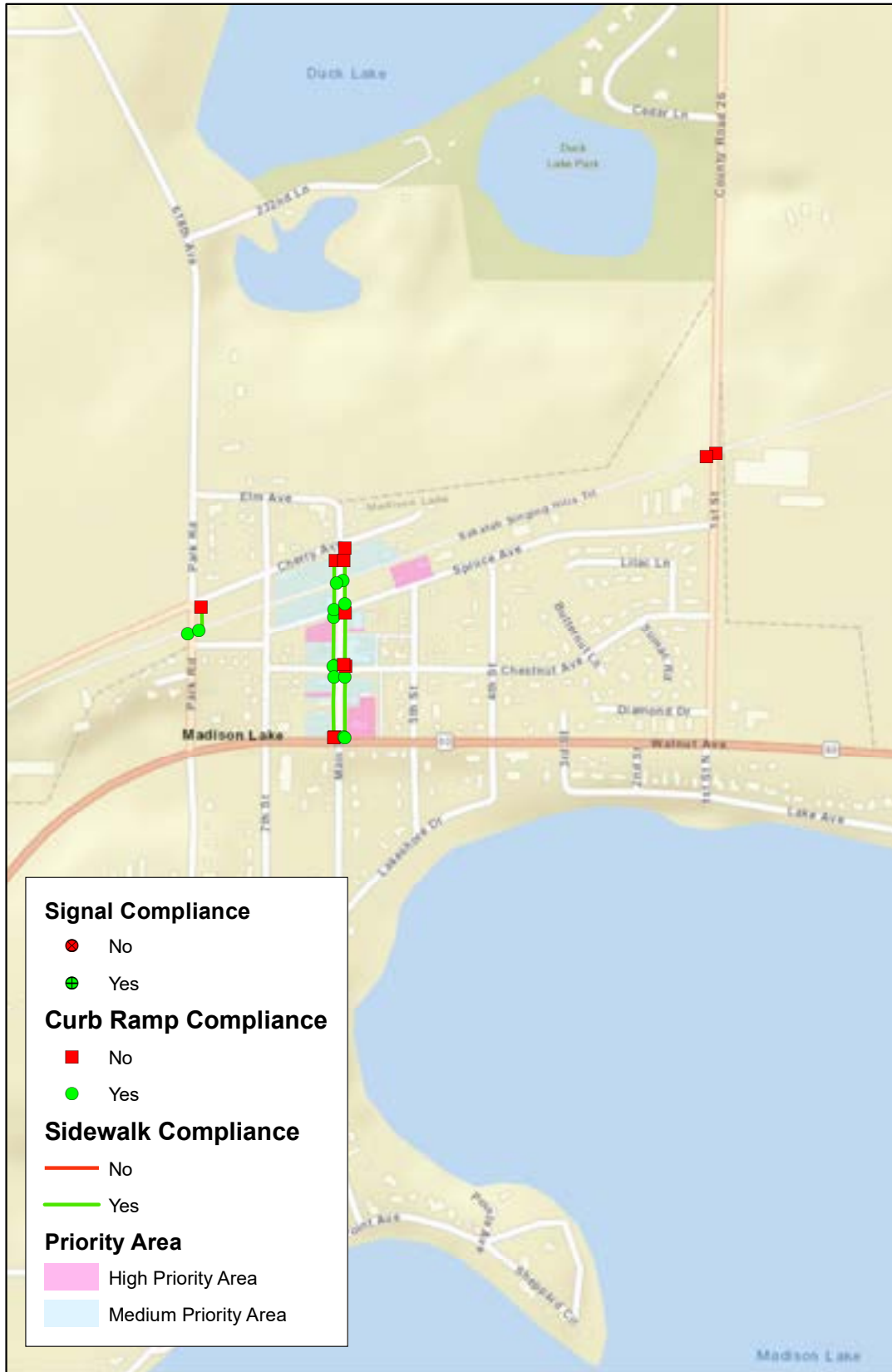


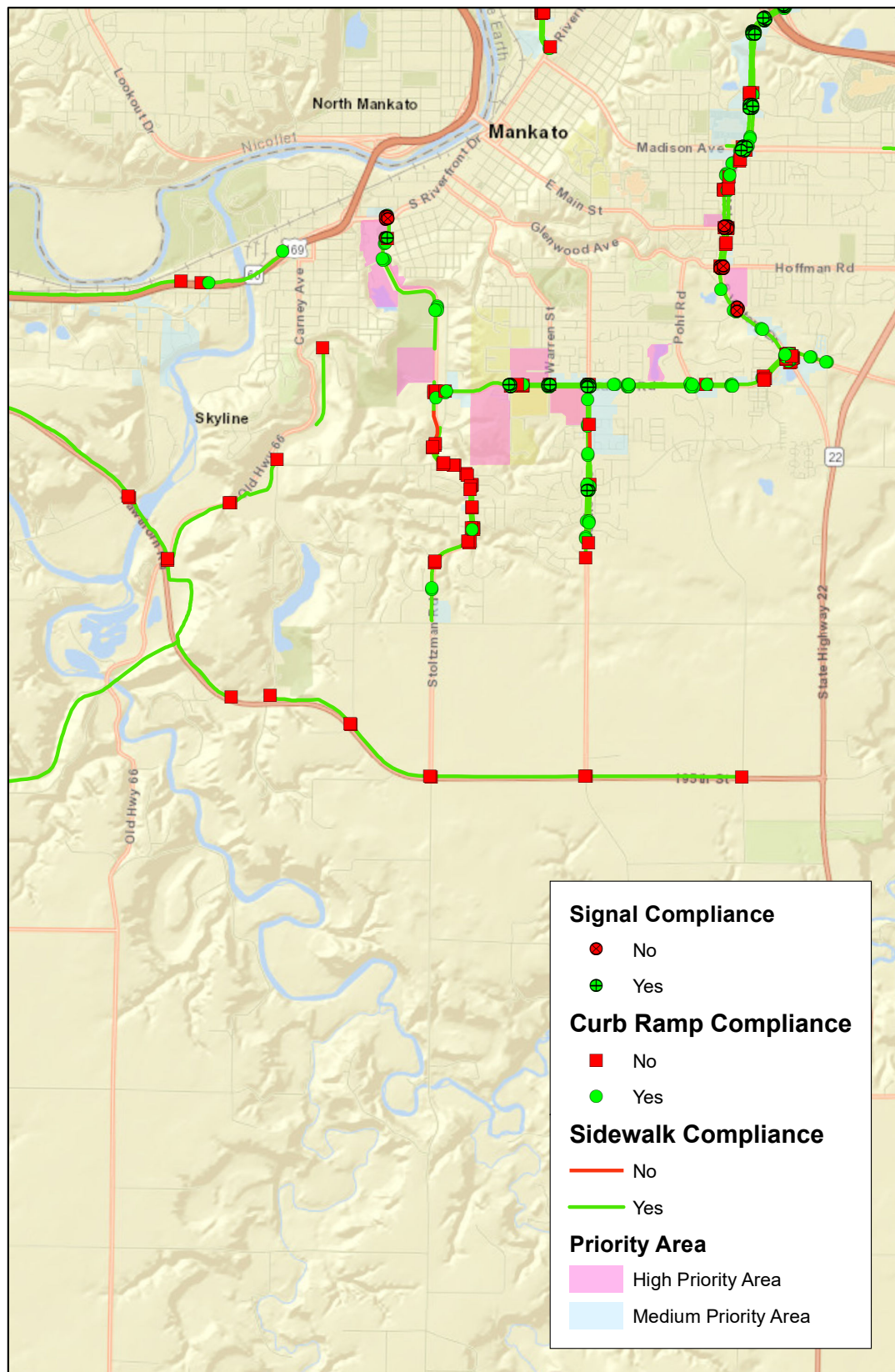


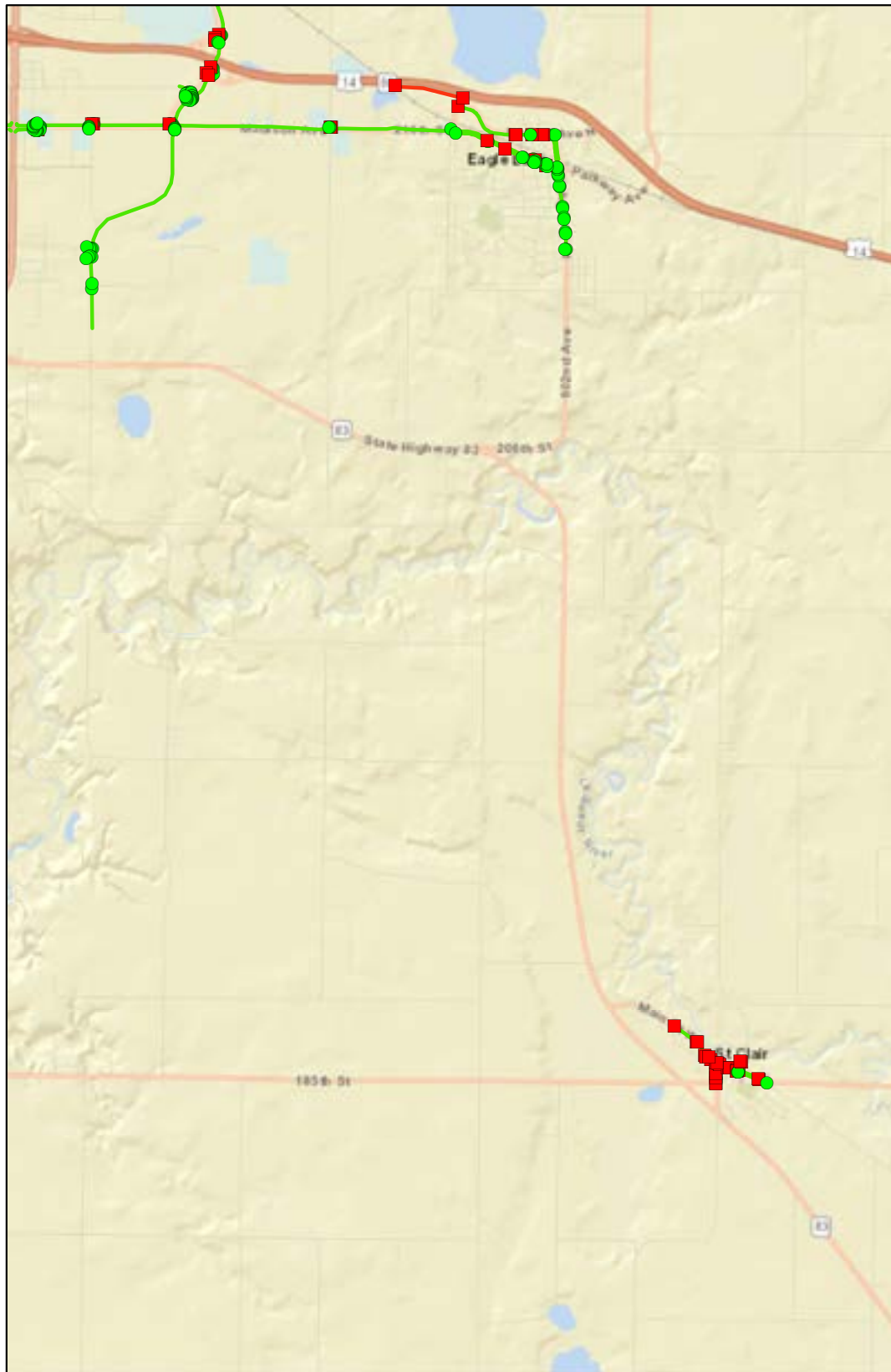
City of Lake Crystal

0 0.1 0.2 Miles





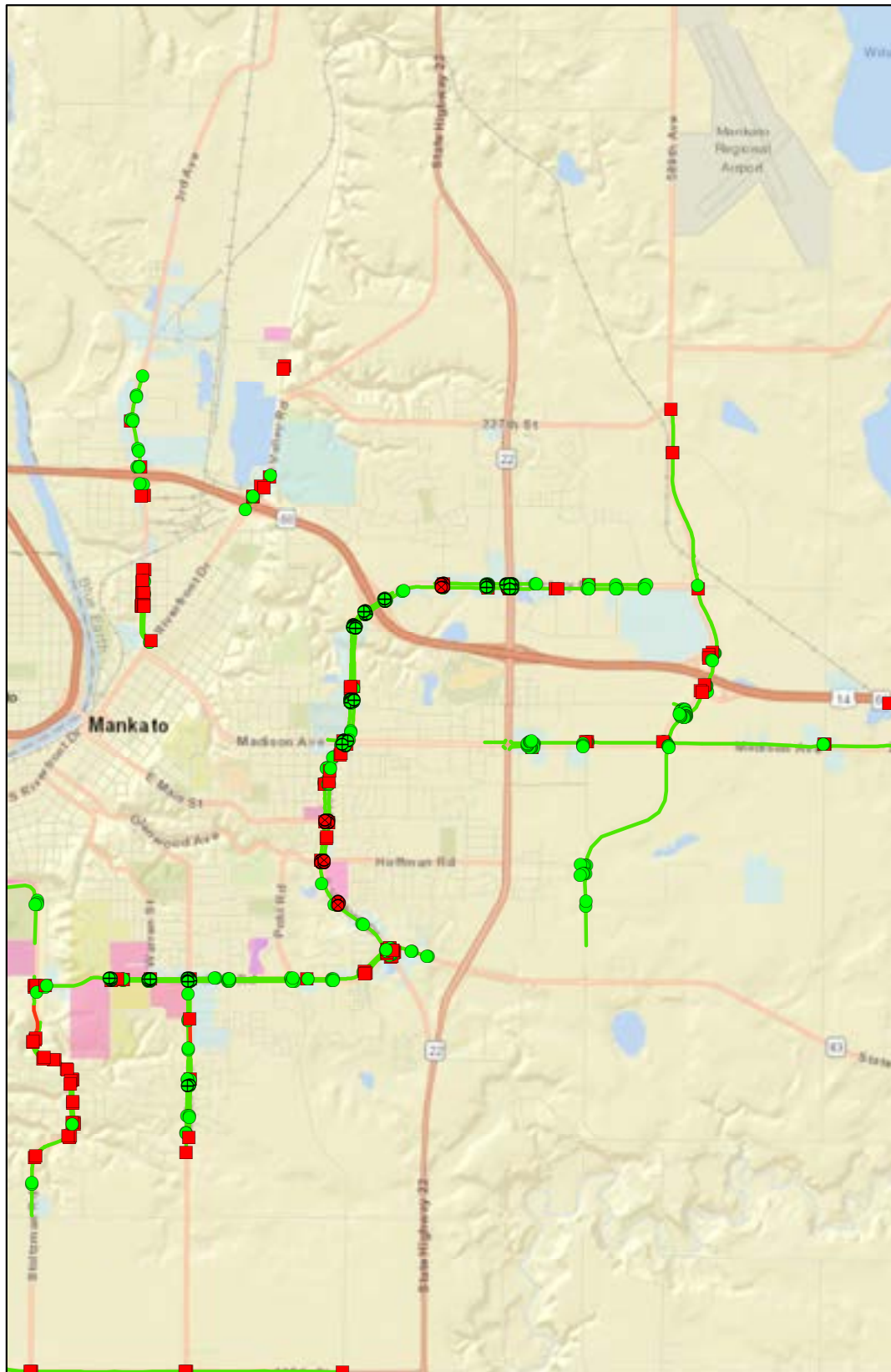




Mankato B

0 0.5 1 Miles

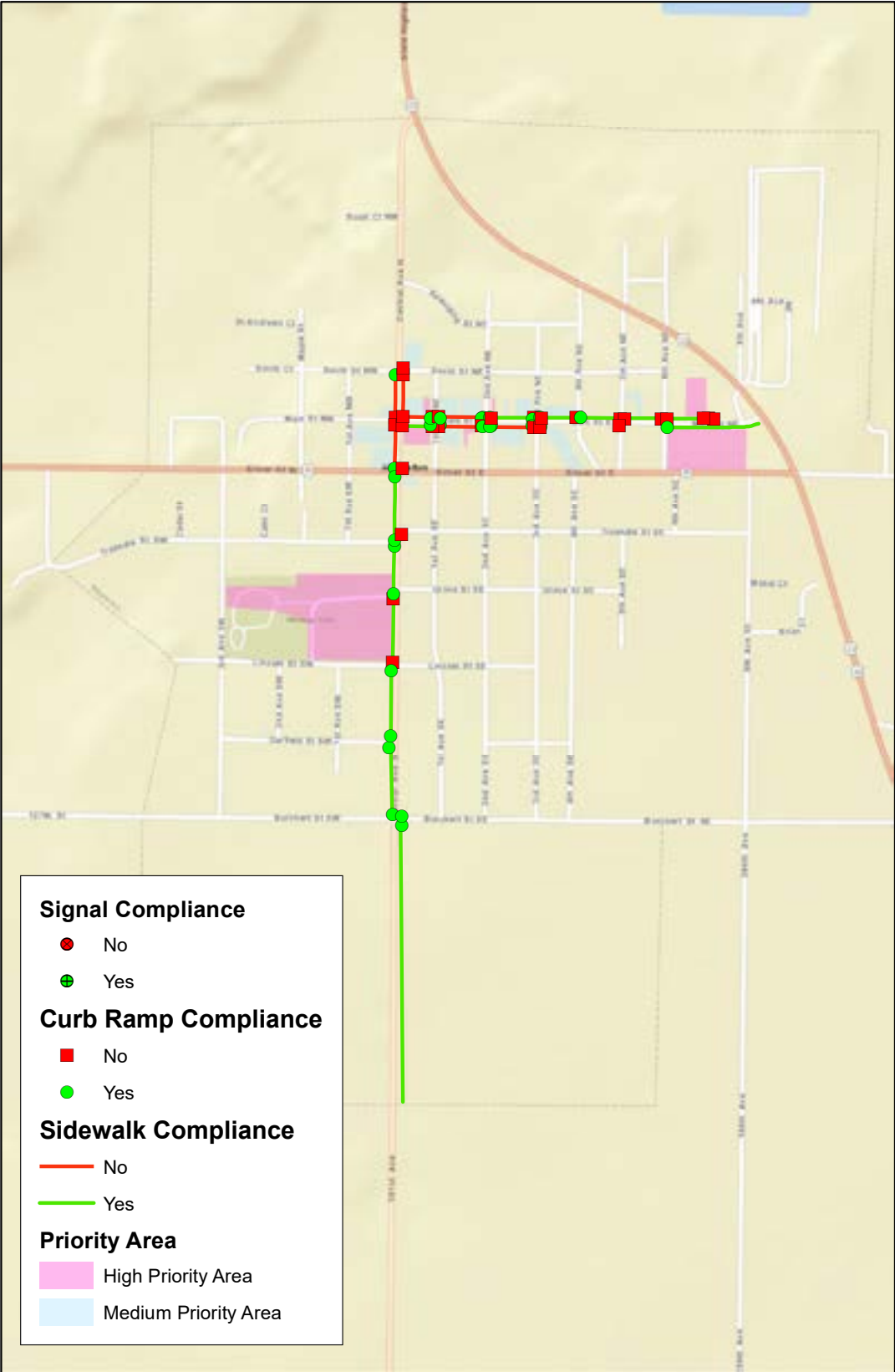




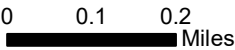
Mankato C

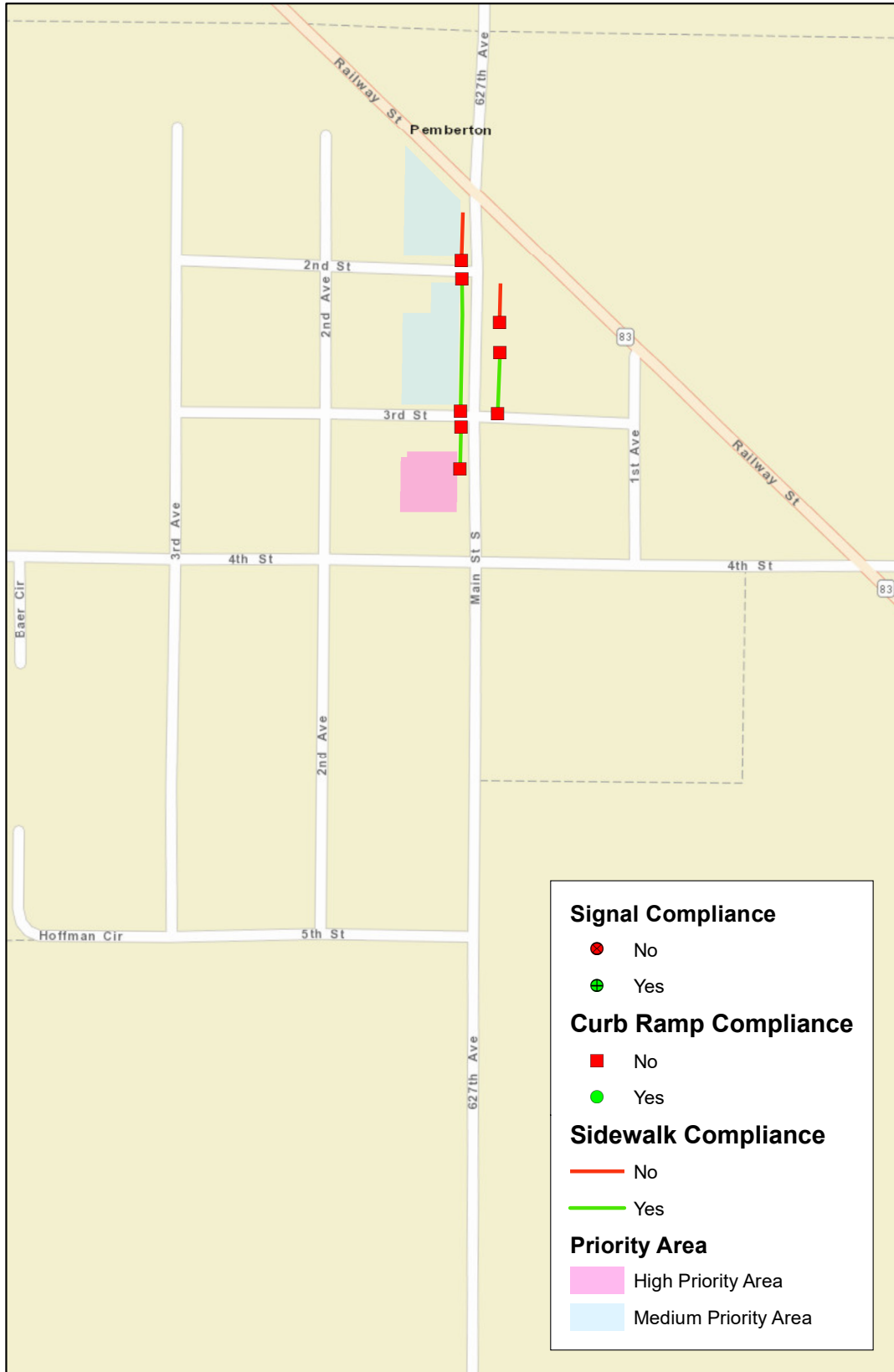
0 0.5 1 Miles

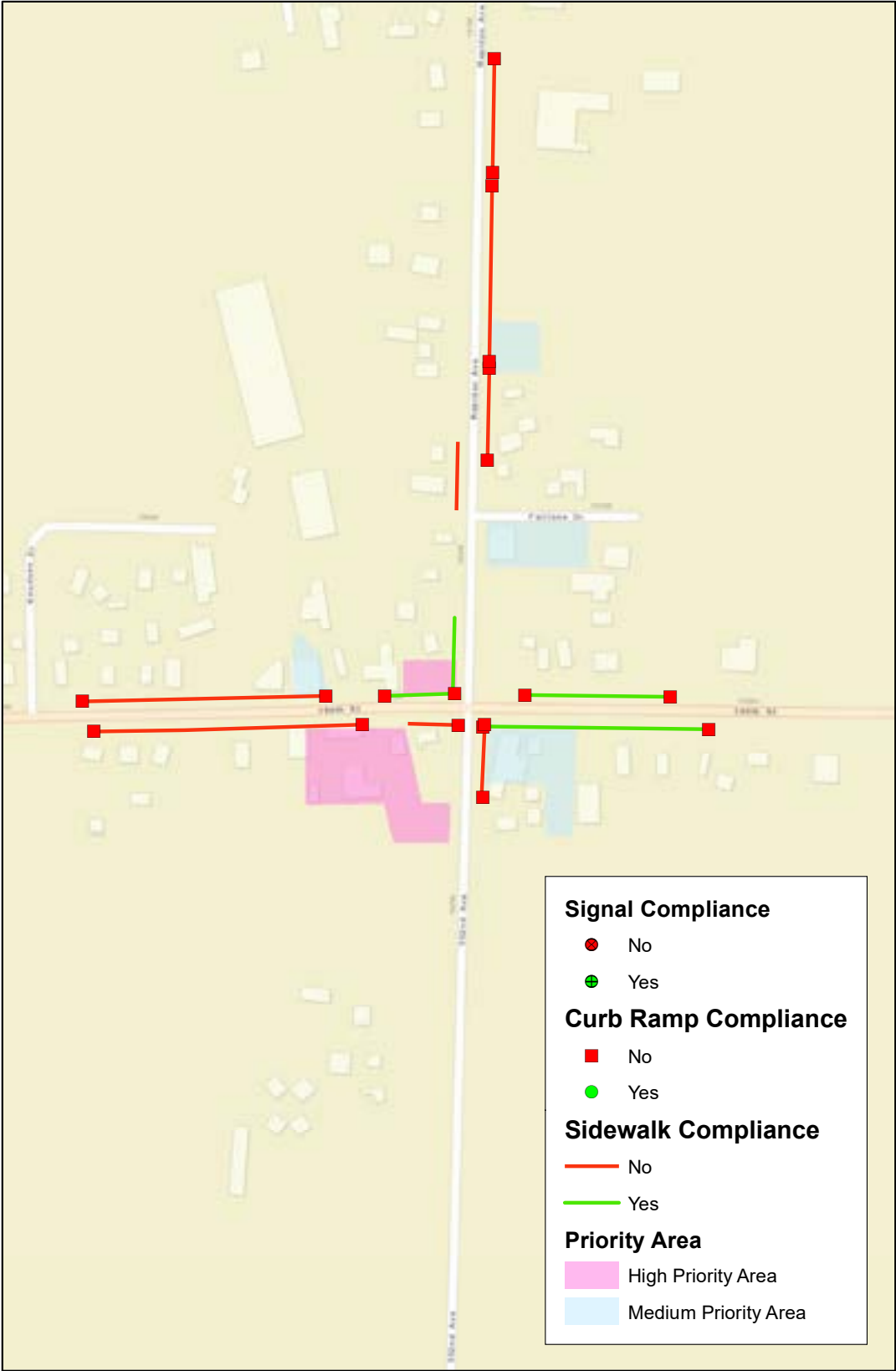




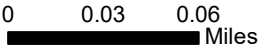
Mapleton







Rapidan

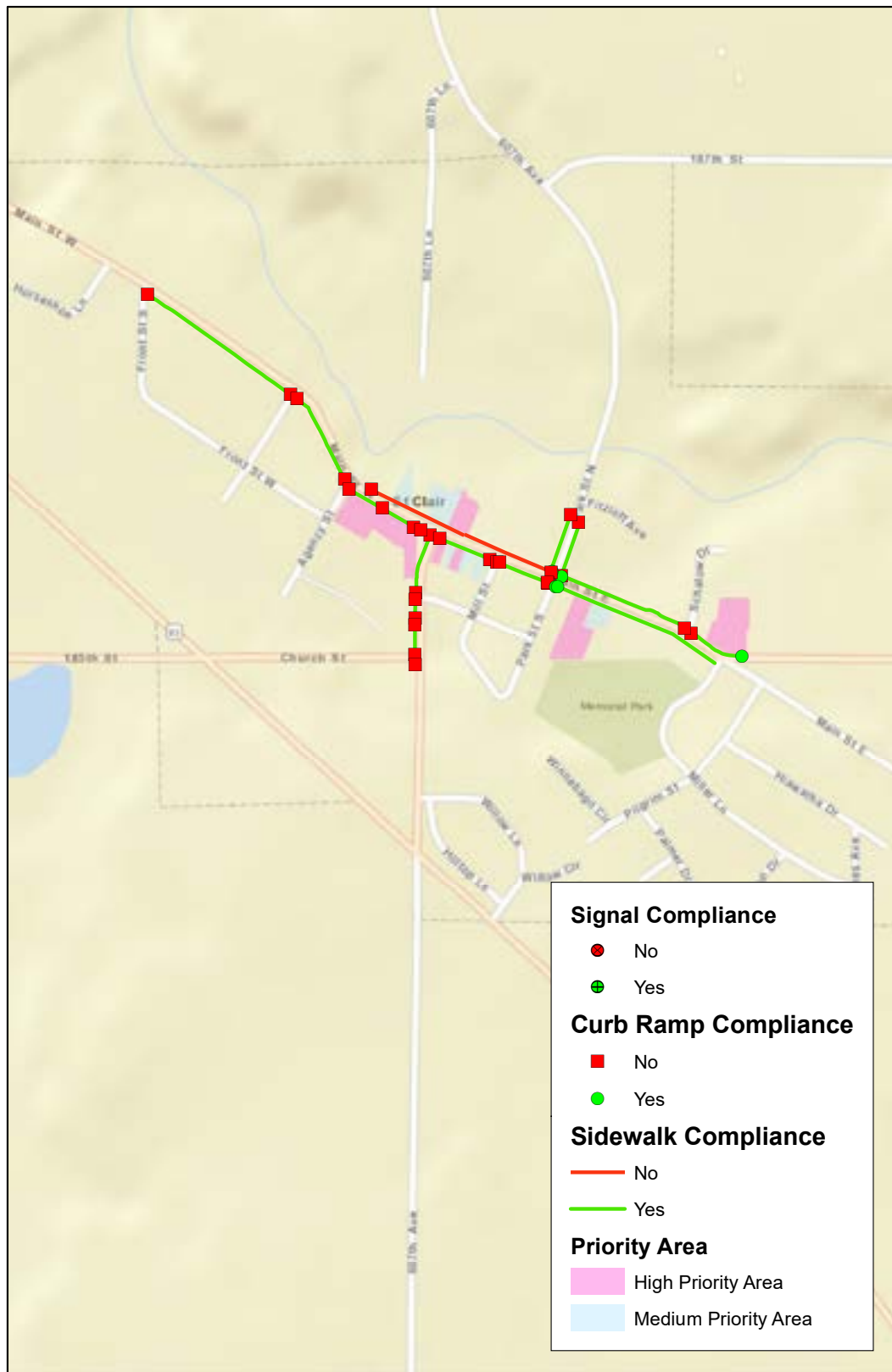




Smith Mills

0 0.05 0.1 Miles







Appendix 6-B: Self-Evaluation - Policy and Practice Review

Appendix 6-B: Blue Earth County, MN Self-Evaluation – Policy and Practice Review

Review of Policies

The County's policies and practices include any county department or division policies and practices that direct staff in its daily work activities. Policies and practices that relate to accessibility and ADA conformance include:

Safely Plowing Snow from Driveways/ Blue Earth County Snow & Ice Control:

Chapter 6 – Transportation

This page on the county's website discusses restrictions related to the displacement of snow from private property into the road right-of-way (ROW). In city limits, Blue Earth County encourages timely removal of snow and other barricades however for continuity purposes the County defaults to the city requirements for removal of snow and ice from pedestrian facilities. Due to multiple interest groups Blue Earth County does not plow recreational trails in the winter with the exception of the Red Jacket Trail from Weagel Park to the City of Mankato limits.

Policy/Practice Understanding and Recommended Revision:

This contains no language regarding clearing ice and snow on pedestrian infrastructure in the public ROW within a time period. However, Blue Earth County currently defaults to each City's requirements for snow removal by residents on City timeframes. Language for this has been included in each City's Routine Maintenance Agreements.

No barriers to accessibility were identified in this policy.

Highway Department Policies – Sidewalk/Trails:

This policy describes shared responsibilities for sidewalks and trails adjacent to County Highways among the County and its municipalities. Cost for construction of sidewalk or trail along existing County Highways is split between the County and respective City 50%/50%. New County Highway construction will include trail or sidewalk and costs will be included in the Highway Construction cost.

Policy/Practice Understanding and Recommended Revision:

This policy identifies cost share for constructing facilities on County Highways but makes no attempt to discuss standards for construction.

No barriers to accessibility were identified in this plan/policy.

Routine Maintenance Agreements with Cities in Blue Earth County (Updated 2018):

These agreements state that cities in Blue Earth County will perform routine maintenance duties to the satisfaction of the Blue Earth County Public Works Director. All materials used in the performance of said routine maintenance must comply with the State of Minnesota's current "Standard Specifications for Construction". The reports outline cost sharing responsibilities between the County and cities regarding vehicle and pedestrian infrastructure. Costs are shared for pedestrian crosswalk markings and major signal maintenance. Cities are responsible for maintaining highways and adjacent sidewalks and/or trails to keep them smooth and in good repair for the passage of vehicular and pedestrian traffic and free from all obstructions and impediments to traffic. Cities also dispose of all snow.

Policy/Practice Understanding and Recommended Revision:

By stating that “routine maintenance must comply with the State of Minnesota’s current Standard Specifications for Construction,” this policy implies standards for ADA compliance are incorporated into design.

No barriers to accessibility were identified in these plans/policies.

Appendix 6-C: ADA Transition Plan Projects referenced from the Blue Earth County Capital Improvements Plan

Capital Improvements Plan (CIP) Projects That Include (Consider) Accessible Pedestrian Infrastructure

5-Year Capital Improvement Plan: 2022-2026

Blue Earth County's most recent CIP was adopted on January 7, 2022.

The county will continue to implement infrastructure and maintenance improvements as part of its long-range capital improvement planning and pavement management plan. With these efforts, the county will incorporate ADA-compliant pedestrian facilities and complete accessible infrastructure improvements as needed to ensure access for all users.

Appendix 6-D: Public Outreach Results

Public Outreach Results

Input from the community has been gathered and used to help define priority areas for improvements within the Blue Earth County public rights-of-way.

Public outreach for the creation of this document consisted of the following activities:

Public Open House

MAPO agencies held one public open house to gather input on the state of pedestrian infrastructure in each jurisdiction and priority preferences for projects moving forward.

All stakeholders within MAPO jurisdictions were invited to attend a public information meeting on September 26, 2023. at the Mankato Intergovernmental Center to receive information on the project and provide their feedback on the process and help project staff identify locations that pose barriers to accessibility.

Project Website

A grievance procedure was also available on the site in which the general public could file an electronic grievance, placing comments directly on an interactive map for the city to include in the results of the Self-Evaluation. There were no comments received through this application.

Appendix 6-E: Grievance Procedure

Blue Earth County ADA Grievance Procedure

In accordance with 28 CFR 35.107(b), Blue Earth County has developed the following ADA grievance procedure for the purpose of the prompt and equitable resolution of citizens' complaints, concerns, comments, and other grievances.

Blue Earth County understands that members of the public may desire to contact staff to discuss ADA issues without filing a formal grievance. Members of the public wishing to contact the ADA Coordinator should reference the contact information in Appendix 6-F. Contacting staff to informally discuss ADA issues is welcome and does not limit a person's ability or right to file a formal grievance later.

Those wishing to file a formal written grievance with the Blue Earth County may do so by one of the following methods:

Telephone

Contact the Blue Earth County's ADA Coordinator listed in the Contact Information section of Appendix 6-F to submit an oral grievance. The staff person will use the internet to electronically submit the grievance on behalf of the person filing it.

Paper Submission

A paper copy of the county's grievance form is available by request from the Blue Earth County ADA Coordinator (contact information in Appendix 6-F). Complete the form and submit it to the county ADA Coordinator at the address listed.

The County of will acknowledge receipt of the grievance to the citizen within 10 working days of the submission. County staff will then provide a response or resolution to the grievance or will provide information on when the citizen can expect a response. If the grievance filed does not fall within Blue Earth County's jurisdiction, staff will work with the citizen to contact the agency with jurisdiction.

When possible (typically within 60 calendar days or less of the grievance submission) county staff will conduct an investigation to determine the validity of the alleged violation. As a part of the investigation, internal staff will be consulted to fully understand the complaint and possible solutions. Blue Earth County staff will contact the citizen to discuss the investigation and proposed resolution.

Blue Earth County will consider all grievances within its particular context or setting. Furthermore, the department will consider many varying circumstances including: access to applicable services, programs, or facilities; the nature of the disability; essential eligibility requirements for participation; health and safety of others; and degree to which a potential solution would constitute a fundamental alteration to the program, service, or facility, or cause undue hardship to Blue Earth County.

Accordingly, the resolution by Blue Earth County of any one grievance does not constitute a precedent upon which the county is bound or upon which other complaining parties may rely.

Complaints of Title II violations may be filed with the Department of Justice (DOJ) within 180 days of the date of discrimination. In certain situations, cases may be referred to a mediation program sponsored by the DOJ. The DOJ may bring a lawsuit where it has investigated a matter and has been unable to resolve violations.

For more information, contact:

U.S. Department of Justice Civil Rights Division
950 Pennsylvania Avenue, N.W. Disability Rights Section – NYAV
Washington, D.C. 20530 www.ada.gov
(800) 514-0301 (voice)
(800) 514-0383 (TTY)

Title II may also be enforced through private lawsuits in Federal court. It is not necessary to file a complaint with the DOJ or any other Federal agency, or to receive a “right-to-sue” letter, before going to court.

File Retention

Blue Earth County shall maintain ADA grievance files on behalf of the City for a period of seven years.

Blue Earth County, MN Grievance Form

Instructions: Please fill out this form completely and submit to:

Blue Earth County ADA Coordinator
35 Map Drive
PO Box 3083
Mankato, MN 56002-3083

Or it can be emailed to the ADA coordinator at Ryan.Thilges@blueearthcountymn.gov

Complainant - person filing grievance:

Name: _____ Date: _____

Address: _____ City, State, Zip Code: _____

Home: _____ Cell: _____

Work: _____ Email: _____

Representing - person claiming an accessibility issue or alleging an ADA violation (if not the complainant):

Name: _____ Date: _____

Address: _____ City, State, Zip Code: _____

Home: _____ Cell: _____

Work: _____ Email: _____

Description and location of the alleged violation and the nature of a remedy sought.

If the complainant has filed the same complaint or grievance with the United States Department of Justice (DOJ), another federal or state civil rights agency, a court, or others, the **name of the agency or court where the complainant filed it and the filing date**.

Agency or Court: _____ Contact Person: _____

Address: _____ City, State, Zip Code: _____

Phone Number: _____ Date Filed: _____

Appendix 6-F: Contact Information

Responsible Officials and Key Staff

Responsible Officials Contact Information

City of Blue Earth County ADA Coordinator:

Ryan Thilges, PE, Public Works Director

35 Map Drive

PO Box 3083

Mankato, MN 56002-3083

P: (507) 304-4025

E: Ryan.Thilges@blueearthcountymn.gov

Appendix 6-G: ADA Design Standards and Procedures

ADA Design Standards and Procedures

Design Standards

Public Rights-of-Way Accessibility Guidelines

Public Rights-of-Way Accessibility Guidelines (PROWAG), developed by the Access Board, are draft guidelines that address accessibility in the public rights-of-way. Sidewalks, street crossings, and other elements of the public rights-of-way present unique challenges to accessibility for which specific guidance is considered essential. The Access Board is developing these guidelines that will address various issues, including access for visually impaired pedestrians at street crossings, wheelchair access to on-street parking, and various constraints posed by space limitations, roadway design practices, slope, and terrain. PROWAG can be found at <http://www.access-board.gov/attachments/article/743/nprm.pdf>.

In 2010 and 2015, as a part of the development of MnDOT's Transition Plan, MnDOT Issued Technical Memorandum 10-02-TR-01 Adoption of Public Rights of way Accessibility Guidance and Technical Memorandum No. 15--02-TR-01 Adoption of Public Rights-of -Way Accessibility Guidance (PROWAG), respectively to their staff, cities, and counties. These memorandums, which have both expired, make the PROWAG the primary guidance for accessible facility design on MnDOT projects. In addition, these technical memorandums can be found on MnDOT's website. See (<http://techmemos.dot.state.mn.us/>).

Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way

The Access Board is proposing these accessibility guidelines for the design, construction, and alteration of pedestrian facilities in the public right-of-way. The guidelines ensure that sidewalks, pedestrian street crossings, pedestrian signals, and other facilities for pedestrian circulation and use constructed or altered in the public right-of-way by state and local governments are readily accessible for pedestrians with disabilities. When the guidelines are adopted, with or without additions and modifications, as accessibility standards in regulations issued by other federal agencies implementing the ADA, Section 504 of the Rehabilitation Act, and the Architectural Barriers Act, compliance with these accessibility standards is mandatory. These proposed accessibility guidelines can be found on the Access Board website (<http://www.access-board.gov>) under Public Rights-of-Way or at <http://www.access-board.gov/attachments/article/743/nprm.pdf>.

Accessible Public Rights-of-Way Planning and Design for Alterations (August 2007)

This report and its recommendations are the work of the Public Rights-of-Way Access Advisory Committee (PROWAAC) – Subcommittee on Technical Assistance and are intended to provide technical assistance only. The report is not a rule and has no legal effect. It has not been endorsed by the U.S. Access Board, the Department of Justice, or the Federal Highway Administration of the Department of Transportation. Still it can be a technical advisory source for engineers and technicians who are planning and designing for alterations to pedestrian elements. This document is on the Access Board website (<http://www.access-board.gov>) or at <http://www.access-board.gov/attachments/article/756/guide.pdf>.

Minnesota Department of Transportation

Building on the adoption of PROWAG as planning and design guidance for accessible pedestrian facilities, MnDOT has developed additional planning, design, and construction guidance that is available to local agencies. Listed below is information on additional design guidance available. This is not intended to be an exclusive or comprehensive list of ADA guidance, but rather an acknowledgement of guidance staff should consider and a starting point for information on providing accessible pedestrian facilities.

The MnDOT Accessibility webpage, which has good information in a variety of subject areas related to ADA and accessibility, can be found at <http://www.dot.state.mn.us/ada/index.html>. The webpage also provides the ability to sign up for ADA policy and design training classes when available and to review material from

previous trainings.

Curb Ramp Guidelines: <http://www.dot.state.mn.us/ada/pdf/curbramp.pdf>

ADA Project Design Guide Memo: <http://www.dot.state.mn.us/ada/pdf/adaprojectdesignguidememo.pdf>
ADA Project Design Guide: <http://www.dot.state.mn.us/ada/pdf/adaprojectdesignguide.pdf>

Pedestrian Curb Ramp Details Standard Plans 5-297.250 can be found on MnDOT's website at <http://standardplans.dot.state.mn.us/>

Driveway and Sidewalk Details Standard Plans 5-297.254 can be found on MnDOT's website at <http://standardplans.dot.state.mn.us/>

MnDOT's 7000 series Standard Plates, which are approved standards drawings, provide information on standard details of construction and materials related to curbs, gutters, and sidewalks are on MnDOT's website at <http://standardplates.dot.state.mn.us/stdplate.aspx>

The MnDOT Facility Design Guide serves as a uniform design guide for engineers and technicians working on MnDOT projects. The document is available to others (such as Hennepin County) as a technical resource. Chapter 11 – Special Designs, includes information on the design of pedestrian facilities. The Road Design Manual can be found at (<http://roaddesign.dot.state.mn.us/roaddesign.aspx>)

MnDOT's Pedestrian Accommodations Through Work Zones webpage, <http://www.dot.state.mn.us/trafficeng/workzone/apr.html> contains information on providing accessibility during impacts due to maintenance or construction activities.

Design Procedures

Intersection Corners

Blue Earth County will attempt to construct or upgrade pedestrian curb ramps to be consistent with Access Board recommended designs parameters and MnDOT ADA design guidance and procedures to the extent feasible within all capital reconstruction projects. There may be limitations which make it technically infeasible for the County to achieve these goals at an intersection corner within the scope of any project. Those limitations will be noted and the intersection corners will be constructed to maximize accessibility to the extent feasible within the project scope. As future projects or opportunities arise, additional improvements at these locations may be incorporated into future projects. The County will strive to ensure that each intersection corner is constructed to be as accessible as possible.

Sidewalks / Trails

Blue Earth County will attempt to construct or upgrade sidewalks and trails to be consistent with Access Board recommended designs parameters, MnDOT ADA design guidance and procedures to the extent feasible within all capital improvement projects. There may be limitations which make it technically infeasible for the County to achieve these goals within all segments of sidewalks or trails within the scope of any project. Those limitations will be noted and those segments will be constructed to maximize accessibility to the extent feasible within the project scope. As future projects or opportunities arise, additional improvements at these locations may be incorporated into future projects. The County will strive to ensure that every sidewalk or trail is constructed to be as accessible as possible.



Part 7 - Nicollet County
ADA Transition Plan and Inventory



INTRODUCTION

Nicollet County is a partner agency of the Mankato/North Mankato Area Planning Organization (MAPO) and has completed a Self-Evaluation and developed an ADA Transition Plan as part of the overarching MAPO ADA Transition Plan effort. This “Part 7 – Nicollet County ADA Transition Plan and Inventory” has been developed solely for Nicollet County and includes information, data, and recommendations relevant to the County’s interests and those of the MAPO. Nicollet County adopts “Part 1 – MAPO Partner Agency Requirements and Project Purpose” of the MAPO ADA Transition Plan and Inventory overarching document and associated appendices concurrent with the adoption of “Part 7 – Nicollet County ADA Transition Plan and Inventory.”

This chapter accomplishes the following:

- Provides requirements mandated by ADA law for all agencies
- Introduces MAPO Partners
- Outlines public participation initiatives
- Provides the methodology used for agency Self-Evaluation
- Provides the methodology used for prioritization strategies for implementation.

PUBLIC OUTREACH

The following summarizes public outreach for the Nicollet County

- County Board of Commissioners Meeting: During the process, project staff were asked to discuss project initiatives with the County Board on November 14, 2023.
- Grievance Procedure: In compliance with 28 C.F.R. Sec. 35.107, the County has established the grievance procedure to receive future comments and concerns regarding barriers to accessibility. This can be seen in Appendix 2-E and is further detailed in Section VII below.
- Public Information Meetings: Project staff solicited feedback from the community on issues pertaining to ADA deficiencies within the community and initiatives for Transition Plan development while attending a public information meeting that took place on September 26, 2023. See Appendix 1-A for summaries of those meetings.
- County Website: A summary of comments received and detailed information regarding the public outreach activities are located in Appendix 2- D.

Review of Programs

In 2023, the Nicollet County reviewed the 2017 inventory of pedestrian facilities within its public rights-of-way. New projects since 2017 were included and any grievances were updated. This evaluation consisted of the following facilities:

- Pedestrian Ramps at city road crossings that include trail or sidewalk facilities.
- Crosswalks
- Sidewalks

There are 173 pedestrian ramps and 117 sidewalk segments within Nicollet County right-of-way. Of the 173 pedestrian ramps, 118 are fully compliant. Of the 117 sidewalk segments, 106 are fully compliant. There are 32 crosswalks in the County and four of them are compliant.

Nicollet County Self-Evaluation Infrastructure Data Collection Results		
Infrastructure Type	% Compliant	Summary
Pedestrian Ramps	68%	173 total pedestrian ramps 118 (68%) are compliant
Sidewalks	91%	117 Sidewalk segments 106 segments of sidewalk/trail (91%) are compliant
Crosswalks	13%	32 crosswalks were inventoried 4 of the crosswalks were compliant (13%)

Review of Policies and Practices

Previous Practices

Since the adoption of the ADA, Nicollet County has worked to provide accessible pedestrian features as part of road construction and reconstruction projects. As additional information was made available as to the methods of providing accessible pedestrian features, the county updated their procedures to accommodate these methods.

Policy

Nicollet County's goal is to continue to provide accessible pedestrian design features as part of street construction and reconstruction projects. The county will reference ADA design standards and procedures listed in Appendix 7-G. These standards and procedures provide the preferred standard for ADA compliance in Minnesota and will serve as the primary guidance for all future projects.

The county will consider and respond to all accessibility improvement requests. All accessibility improvements that have been deemed reasonable will be scheduled consistent with transportation priorities. The county will coordinate with external agencies to ensure that all new or altered pedestrian facilities within the county's jurisdiction are ADA compliant to the maximum extent feasible. Requests for accessibility improvements can be submitted to Nicollet County's ADA Coordinator. Contact information for ADA Coordinator is located in Appendix 7-F.

Maintenance of pedestrian facilities within the public rights-of-way will continue to follow the policies set forth by the county. A breakdown of relevant policies can be seen in Appendix 7-B which includes the following:

- Cooperative Construction Agreements
- Cost Participation Policy (2009)
- Nicollet County Comprehensive Plan Update (2018)

IMPLEMENTATION PLAN

Priority Areas

Nicollet County identified specific locations as priority areas for planned accessibility improvement projects based on criteria identified in Part 1-Section IV. These areas have been selected due to their proximity to specific land uses consistent with higher levels of pedestrian traffic, from the receipt of public comments, as well as areas exhibiting high levels of non-compliance.

Additional priority will be given to any location where an improvement project or alteration was constructed after January 26, 1991, and accessibility features were omitted.

External Agency Coordination

Sidewalk and trail infrastructure in Nicollet County is mostly contained within the local jurisdictions of Lafayette, Nicollet, North Mankato, and Saint Peter. The Nicollet County Cost Participation Policy indicates how the County intends to share costs with the cities on relevant projects within their boundaries. Cities are responsible for participating in ADA improvements in accordance with the Cost Participation Policy.

The County will coordinate with cities within its jurisdiction to track and assist in the facilitation of the elimination of accessibility barriers along County routes within city limits.

Schedule

Nicollet County will utilize two methods for upgrading pedestrian facilities to the current ADA standards. The first and most comprehensive of the two methods are the scheduled street and utility improvement projects. All pedestrian facilities impacted by these projects will be upgraded to current ADA accessibility standards. The second method is the stand alone sidewalk and ADA accessibility improvement project. These projects will be incorporated into the Capital Improvement Program (CIP) on a case by case basis as determined by Nicollet County staff. The county CIP, which includes a detailed schedule and budget for specific improvements, is available on the County website.

Nicollet County will work with cities in its jurisdiction to program improvements into respective Capital Improvement Projects. The County has set the following schedule goal for improving the accessibility of its pedestrian facilities within the County's jurisdiction:

- After 20 years, 100% of accessibility features within the jurisdiction of Nicollet County would be ADA compliant.

Improvements will be coordinated with each city's annual budget and 5-year Capital Improvements Plan, and long-term maintenance efforts.

ADA COORDINATOR

In accordance with 28 C.F.R Sec. 35.107(a), Nicollet County has identified an ADA Title II Coordinator to oversee The County's policies and procedures. Contact information for this individual is located in Appendix 7-F.

GRIEVANCE PROCEDURE

Under the Americans with Disabilities Act, each agency is required to publish its responsibilities in regards to the ADA. If users of Nicollet County facilities and services believe the County has not provided reasonable accommodation, they have the right to file a grievance.

In accordance with 28 C.F.R. Sec. 35.107(b), the county has developed a grievance procedure for the purpose of the prompt and equitable resolution of citizens' complaints, concerns, comments, and other grievances. This draft of the public notice and Nicollet County's grievance procedure is outlined in Appendix 7-E.

MONITOR THE PROGRESS

This document will be updated as needed to reflect Nicollet County's approach to complying with ADA and providing accessible pedestrian infrastructure. The appendices in this document will be updated periodically to account for improvements , while the main body of the document will be updated within three to five years with a future update schedule to be developed at that time. With each main body update, a public comment period will be established to continue the public outreach.

Appendix 7-A: Self-Evaluation - Program Review

Appendix 7-A: Self-Evaluation – Program Review

Review of Programs

In 2023, the Nicollet County reviewed the 2017 inventory of pedestrian facilities within its public rights-of-way. New projects since 2017 were included and any grievances were updated.

Pedestrian Ramps

Nicollet County has 173 locations where pedestrian ramps exist or should exist within its public rights-of-way. These locations were inventoried for ADA compliance based on (1) whether a pedestrian ramp was present and (2) if compliance criteria outlined in Part 1 Sec. III were met. 118 (68%) of the locations were reported to be compliant.

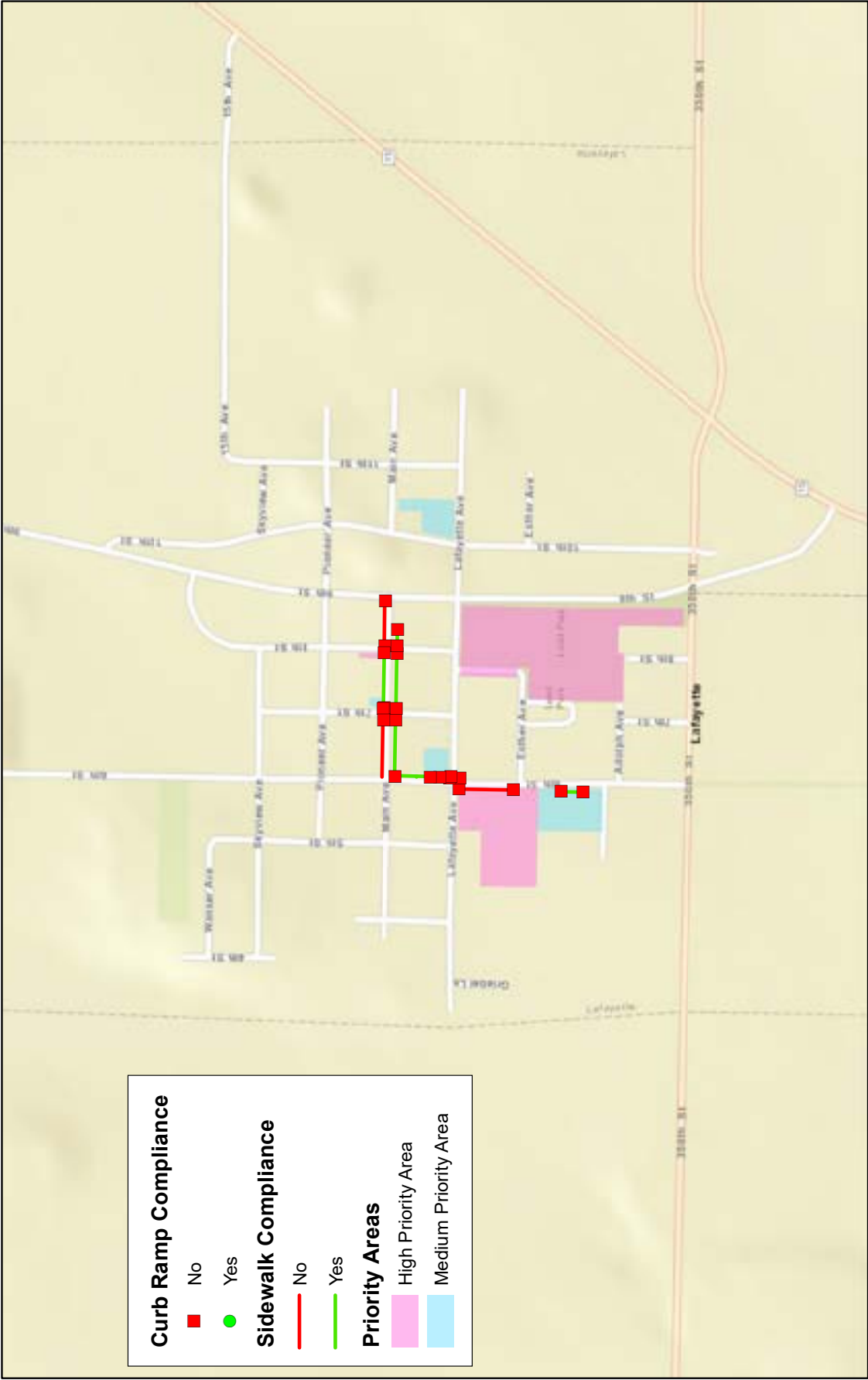
Sidewalks/Trails

The sidewalks and trails within the County public rights-of-way were inventoried and evaluated to determine existing compliance with ADA and to identify existing obstructions based on compliance criteria outlined in Part 1. Of the 117 sidewalk segments evaluated, 106 (91%) were reported to be compliant. Planning level remediation costs for sidewalks and barriers are included in Table 6-A.4.

Public Comment

No comments specific to Nicollet County were received.

Compliant and non-compliant pedestrian infrastructure is illustrated in the follow pages. The timeline for replacement of these sidewalks will depend on priority ranking, correlation to planned projects, reasonable accommodation requests, and available funding. Information on specific locations of non-compliance can be obtained by contacting Nicollet County ADA Coordinator. See contact for the Nicollet County ADA Coordinator in Appendix 7-F.

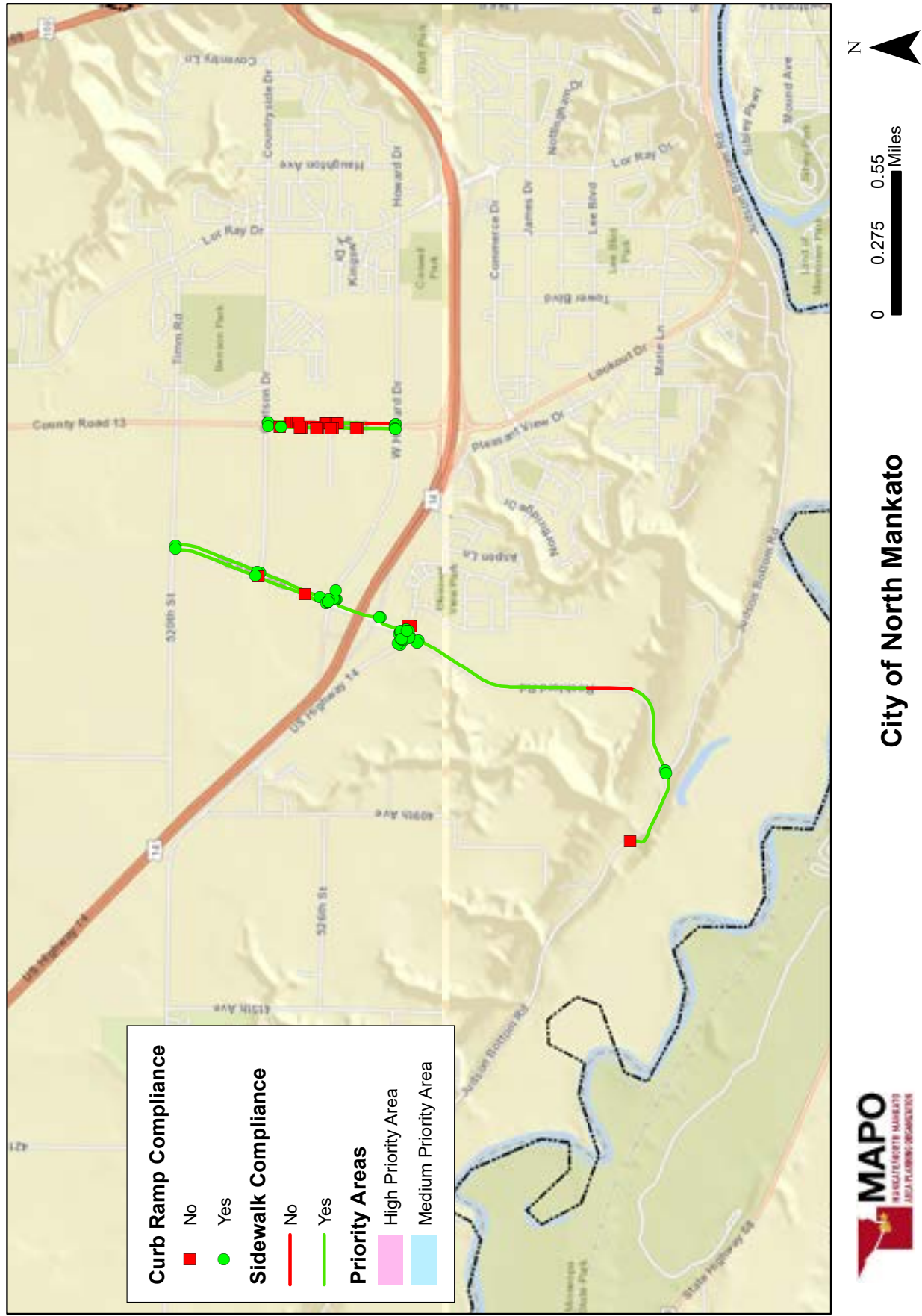


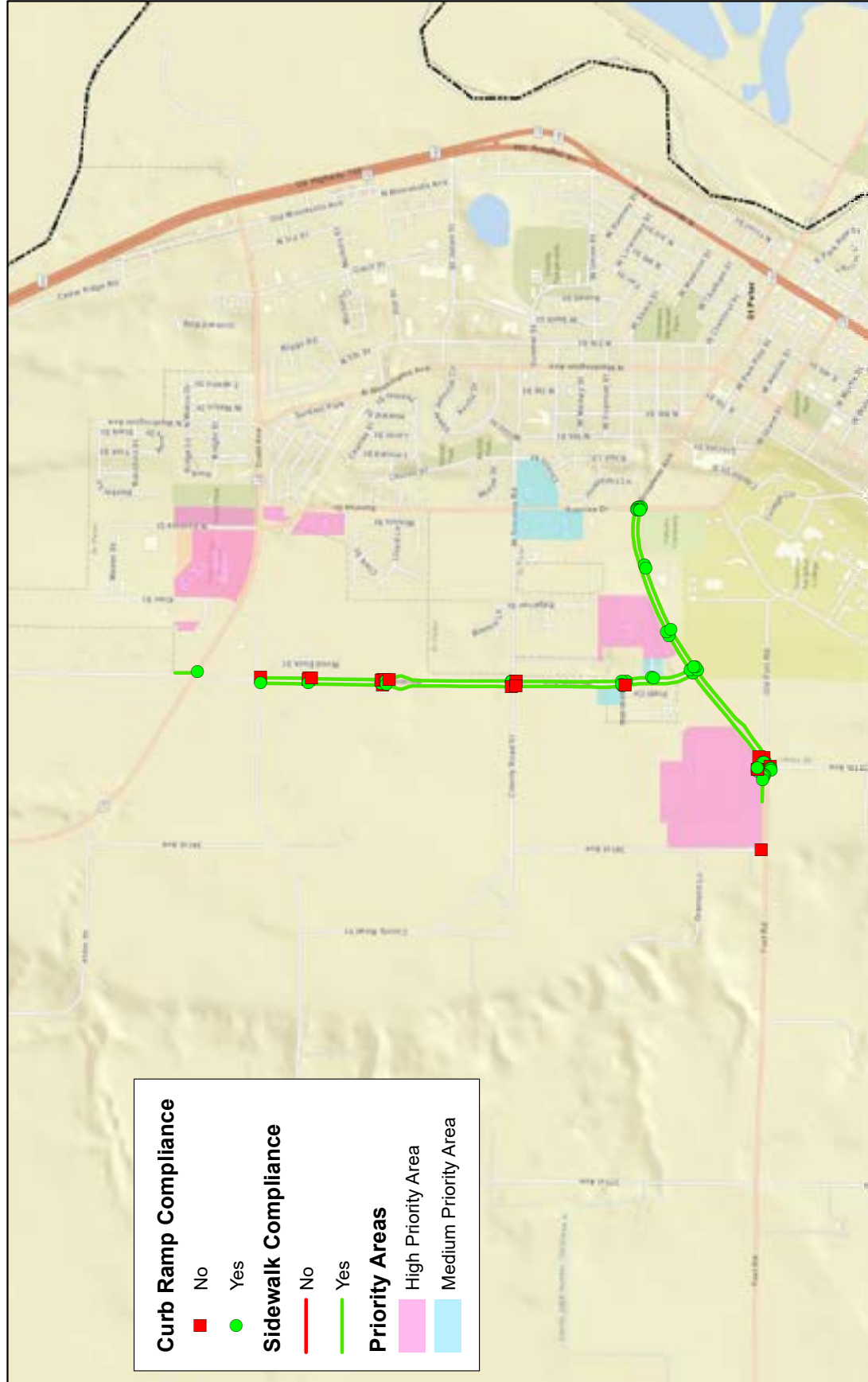
City of Lafayette



0 0.075 0.15 Miles







City of St. Peter



0 0.225 0.45 Miles

Appendix 7-B: Self-Evaluation - Policy and Practice Review

Appendix 7-B: Self-Evaluation – Policy and Practice Review

Review of Policies

The County’s policies and practices include any county department or division policies and practices that direct staff in its daily work activities. Policies and practices that relate to accessibility and ADA conformance include:

Cooperative Construction Agreements:

Cooperative Construction Agreements are executed with a city when a project is initiated on a county road within city limits. This type of agreement states that all trails and sidewalks are to be maintained by the cities in Nicollet County.

Policy Understanding and Recommended Revision:

No barriers to accessibility were identified in this plan/policy.

Cost Participation Policy (2009):

This policy outlines maintenance by cities on county Roads. Page 8 talks about maintenance of trails and sidewalks. In Nicollet County, “the municipality is responsible for maintaining bicycle paths, walking trails, sidewalk, and other related items within county highway rights-of-way on an urban design section.

Policy Understanding and Recommended Revision:

The following revisions to this policy are recommended as part of this review:

- Amend the policy to include a definition of “maintenance” that describes actions performed that ensure ADA compliance and/or access for all users is maintained.

Nicollet County Comprehensive Plan Update (2018):

At the time this plan was developed, the county was undertaking an update to its comprehensive plan. The plan was not anticipated to be complete prior to completion of this ADA Transition Plan and was not anticipated to address ADA compliance, standards, or guidelines.

Policy Understanding and Recommended Revision:

The following additions to this Plan update are recommended as part of this review:

- Amend the Plan to include language that ensures pedestrian facilities are designed and constructed to provide full access for all users.
- Amend the Plan to include language considering adherence to ADA standards and guidance as outlined in the PROWAG and MnDOT for ADA facility construction and reconstruction.

Appendix 7-C: ADA Transition Plan Projects referenced from the Nicollet County Capital Improvements Plan

Capital Improvements Plan (CIP) Projects That Include (Consider) Accessible Pedestrian Infrastructure

Nicollet County's most recent CIP was adopted on February 28, 2023

The county will continue to implement infrastructure and maintenance improvements as part of its long-range capital improvement planning and pavement management plan. With these efforts, the county will incorporate ADA-compliant pedestrian facilities and complete accessible infrastructure improvements as needed to ensure access for all users.

Appendix 7-D: Public Outreach Results

Public Outreach Results

Input from the community has been gathered and used to help define priority areas for improvements within the Nicollet County public rights-of-way.

Public outreach for the creation of this document consisted of the following activities:

Public Open House

MAPO agencies held one public open house to gather input on the state of pedestrian infrastructure in each jurisdiction and priority preferences for projects moving forward.

All stakeholders within MAPO jurisdictions were invited to attend a public information meeting on September 26, 2023 at the Mankato Intergovernmental Center to receive information on the project and provide their feedback on the process and help project staff identify locations that pose barriers to accessibility.

Project Website

A grievance procedure was also available on the site in which the general public could file an electronic grievance, placing comments directly on an interactive map for the city to include in the results of the Self-Evaluation. There were no comments received through this application.

Appendix 7-E: Grievance Procedure

ADA Grievance Procedure

In accordance with 28 CFR 35.107(b), Nicollet County has developed the following ADA grievance procedure for the purpose of the prompt and equitable resolution of citizens' complaints, concerns, comments, and other grievances.

Nicollet County understands that members of the public may desire to contact staff to discuss ADA issues without filing a formal grievance. Members of the public wishing to contact the ADA Coordinator should reference the contact information in Appendix 7-F. Contacting staff to informally discuss ADA issues is welcome and does not limit a person's ability or right to file a formal grievance later.

Those wishing to file a formal written grievance with the Nicollet County may do so by one of the following methods:

Telephone

Contact the Nicollet County's ADA Coordinator listed in the Contact Information section of Appendix 7-F to submit an oral grievance. The staff person will use the internet to electronically submit the grievance on behalf of the person filing it.

Paper Submission

A paper copy of the county's grievance form is available by request from the Nicollet County ADA Coordinator (contact information in Appendix 7-F). Complete the form and submit it to the county ADA Coordinator at the address listed.

The county will acknowledge receipt of the grievance to the citizen within 10 working days of the submission. County staff will then provide a response or resolution to the grievance or will provide information on when the citizen can expect a response. If the grievance filed does not fall within Nicollet County's jurisdiction, staff will work with the citizen to contact the agency with jurisdiction.

When possible (typically within 60 calendar days or less of the grievance submission) county staff will conduct an investigation to determine the validity of the alleged violation. As a part of the investigation, internal staff will be consulted to fully understand the complaint and possible solutions. Nicollet County staff will contact the citizen to discuss the investigation and proposed resolution.

Nicollet County will consider all grievances within its particular context or setting. Furthermore, the department will consider many varying circumstances including: access to applicable services, programs, or facilities; the nature of the disability; essential eligibility requirements for participation; health and safety of others; and degree to which a potential solution would constitute a fundamental alteration to the program, service, or facility, or cause undue hardship to Nicollet County.

Accordingly, the resolution by Nicollet County of any one grievance does not constitute a precedent upon which the county is bound or upon which other complaining parties may rely.

Complaints of Title II violations may be filed with the Department of Justice (DOJ) within 180 days of the date of discrimination. In certain situations, cases may be referred to a mediation program sponsored by the DOJ. The DOJ may bring a lawsuit where it has investigated a matter and has been unable to resolve violations.

For more information, contact:

U.S. Department of Justice Civil Rights Division
950 Pennsylvania Avenue, N.W. Disability Rights Section – NYAV
Washington, D.C. 20530 www.ada.gov
(800) 514-0301 (voice)
(800) 514-0383 (TTY)

Title II may also be enforced through private lawsuits in Federal court. It is not necessary to file a complaint with the DOJ or any other Federal agency, or to receive a “right-to-sue” letter, before going to court.

File Retention

Nicollet County shall maintain ADA grievance files on behalf of the City for a period of seven years.

Nicollet County, MN Grievance Form

Instructions: Please fill out this form completely and submit to:

Nicollet County ADA Coordinator
1700 Sunrise Drive
St. Peter, MN 56082

Or it can be emailed to the ADA coordinator at seth.greenwood@co.nicollet.mn.us

Complainant - person filing grievance:

Name: _____ Date: _____

Address: _____ City, State, Zip Code: _____

Home: _____ Cell: _____

Work: _____ Email: _____

Representing - person claiming an accessibility issue or alleging an ADA violation (if not the complainant):

Name: _____ Date: _____

Address: _____ City, State, Zip Code: _____

Home: _____ Cell: _____

Work: _____ Email: _____

Description and location of the alleged violation and the nature of a remedy sought.

If the complainant has filed the same complaint or grievance with the United States Department of Justice (DOJ), another federal or state civil rights agency, a court, or others, the **name of the agency or court where the complainant filed it and the filing date**.

Agency or Court: _____ Contact Person: _____

Address: _____ City, State, Zip Code: _____

Phone Number: _____ Date Filed: _____

Appendix 7-F: Contact Information

Responsible Officials and Key Staff

Responsible Officials Contact Information

City of Nicollet County ADA Coordinator:

Seth Greenwood, PE, Public Works Director

1700 Sunrise Drive

St. Peter, MN 56082

P: (507) 931-1760

E: seth.greenwood@co.nicollet.mn.us

Appendix 7-G: ADA Design Standards and Procedures

ADA Design Standards and Procedures

Design Standards

Public Rights-of-Way Accessibility Guidelines

Public Rights-of-Way Accessibility Guidelines (PROWAG), developed by the Access Board, are draft guidelines that address accessibility in the public rights-of-way. Sidewalks, street crossings, and other elements of the public rights-of-way present unique challenges to accessibility for which specific guidance is considered essential. The Access Board is developing these guidelines that will address various issues, including access for visually impaired pedestrians at street crossings, wheelchair access to on-street parking, and various constraints posed by space limitations, roadway design practices, slope, and terrain. PROWAG can be found at <http://www.access-board.gov/attachments/article/743/nprm.pdf>.

In 2010 and 2015, as a part of the development of MnDOT's Transition Plan, MnDOT Issued Technical Memorandum 10-02-TR-01 Adoption of Public Rights of way Accessibility Guidance and Technical Memorandum No. 15--02-TR-01 Adoption of Public Rights-of -Way Accessibility Guidance (PROWAG), respectively to their staff, cities, and counties. These memorandums, which have both expired, make the PROWAG the primary guidance for accessible facility design on MnDOT projects. In addition, these technical memorandums can be found on MnDOT's website. See (<http://techmemos.dot.state.mn.us/>).

Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way

The Access Board is proposing these accessibility guidelines for the design, construction, and alteration of pedestrian facilities in the public right-of-way. The guidelines ensure that sidewalks, pedestrian street crossings, pedestrian signals, and other facilities for pedestrian circulation and use constructed or altered in the public right-of-way by state and local governments are readily accessible for pedestrians with disabilities. When the guidelines are adopted, with or without additions and modifications, as accessibility standards in regulations issued by other federal agencies implementing the ADA, Section 504 of the Rehabilitation Act, and the Architectural Barriers Act, compliance with these accessibility standards is mandatory. These proposed accessibility guidelines can be found on the Access Board website (<http://www.access-board.gov>) under Public Rights-of-Way or at <http://www.access-board.gov/attachments/article/743/nprm.pdf>.

Accessible Public Rights-of-Way Planning and Design for Alterations (August 2007)

This report and its recommendations are the work of the Public Rights-of-Way Access Advisory Committee (PROWAAC) – Subcommittee on Technical Assistance and are intended to provide technical assistance only. The report is not a rule and has no legal effect. It has not been endorsed by the U.S. Access Board, the Department of Justice, or the Federal Highway Administration of the Department of Transportation. Still it can be a technical advisory source for engineers and technicians who are planning and designing for alterations to pedestrian elements. This document is on the Access Board website (<http://www.access-board.gov>) or at <http://www.access-board.gov/attachments/article/756/guide.pdf>.

Minnesota Department of Transportation

Building on the adoption of PROWAG as planning and design guidance for accessible pedestrian facilities, MnDOT has developed additional planning, design, and construction guidance that is available to local agencies. Listed below is information on additional design guidance available. This is not intended to be an exclusive or comprehensive list of ADA guidance, but rather an acknowledgement of guidance staff should consider and a starting point for information on providing accessible pedestrian facilities.

The MnDOT Accessibility webpage, which has good information in a variety of subject areas related to ADA and accessibility, can be found at <http://www.dot.state.mn.us/ada/index.html>. The webpage also provides the ability to sign up for ADA policy and design training classes when available and to review material from

previous trainings.

Curb Ramp Guidelines: <http://www.dot.state.mn.us/ada/pdf/curbramp.pdf>

ADA Project Design Guide Memo: <http://www.dot.state.mn.us/ada/pdf/adaprojectdesignguidememo.pdf>
ADA Project Design Guide: <http://www.dot.state.mn.us/ada/pdf/adaprojectdesignguide.pdf>

Pedestrian Curb Ramp Details Standard Plans 5-297.250 can be found on MnDOT's website at <http://standardplans.dot.state.mn.us/>

Driveway and Sidewalk Details Standard Plans 5-297.254 can be found on MnDOT's website at <http://standardplans.dot.state.mn.us/>

MnDOT's 7000 series Standard Plates, which are approved standards drawings, provide information on standard details of construction and materials related to curbs, gutters, and sidewalks are on MnDOT's website at <http://standardplates.dot.state.mn.us/stdplate.aspx>

The MnDOT Facility Design Guide serves as a uniform design guide for engineers and technicians working on MnDOT projects. The document is available to others (such as Hennepin County) as a technical resource. Chapter 11 – Special Designs, includes information on the design of pedestrian facilities. The Road Design Manual can be found at (<http://roaddesign.dot.state.mn.us/roaddesign.aspx>)

MnDOT's Pedestrian Accommodations Through Work Zones webpage, <http://www.dot.state.mn.us/trafficeng/workzone/apr.html> contains information on providing accessibility during impacts due to maintenance or construction activities.

Design Procedures

Intersection Corners

Nicollet County will attempt to construct or upgrade pedestrian curb ramps to be consistent with Access Board recommended designs parameters and MnDOT ADA design guidance and procedures to the extent feasible within all capital reconstruction projects. There may be limitations which make it technically infeasible for the County to achieve these goals at an intersection corner within the scope of any project. Those limitations will be noted and the intersection corners will be constructed to maximize accessibility to the extent feasible within the project scope. As future projects or opportunities arise, additional improvements at these locations may be incorporated into future projects. The County will strive to ensure that each intersection corner is constructed to be as accessible as possible.

Sidewalks / Trails

Nicollet County will attempt to construct or upgrade sidewalks and trails to be consistent with Access Board recommended designs parameters, MnDOT ADA design guidance and procedures to the extent feasible within all capital improvement projects. There may be limitations which make it technically infeasible for the County to achieve these goals within all segments of sidewalks or trails within the scope of any project. Those limitations will be noted and those segments will be constructed to maximize accessibility to the extent feasible within the project scope. As future projects or opportunities arise, additional improvements at these locations may be incorporated into future projects. The County will strive to ensure that every sidewalk or trail is constructed to be as accessible as possible.