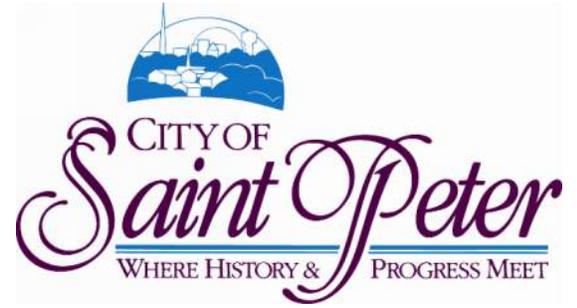




Real People. Real Solutions.



Saint Peter, MN

Americans with Disabilities Act Self-Evaluation and Transition Plan

February 2020



Prepared by:

Bolton & Menk, Inc.
1960 Premier Drive
Mankato, MN 56001
P: 507-625-4171
F: 507-625-4177

Table of Contents

I.	Introduction	1
A.	Transition Plan Need and Purpose	1
B.	ADA and its Relationship to Other Laws	1
C.	Agency Requirements	1
II.	Self-Evaluation	2
A.	Overview	2
B.	Methodology	2
C.	Summary	4
III.	Policies and Practices	5
A.	Previous Practices	5
B.	Policy	5
IV.	Implementation Plan	6
A.	Priority Areas	6
B.	External Agency Coordination	7
C.	Cost Estimates	7
D.	Implementation Schedule	7
V.	ADA Coordinator	8
VI.	Public Outreach	8
VII.	Grievance Procedure	9
VIII.	Monitor the Progress	9

Appendix

Appendix A: Deficiencies

Appendix B: Self-Evaluation

Appendix C: ADA Transition Plan Projects referenced from the City of Saint Peter Capital Improvements Plan

Appendix D: Public Outreach Results

Appendix E: Grievance Procedure

Appendix F: Contact Information

Appendix G: ADA Design Standards and Procedures

I. INTRODUCTION

A. Transition Plan 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 a provider of public transportation services and programs, the City of Saint Peter 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](#), the City of Saint Peter has conducted a self-evaluation of its facilities within public rights-of-way and has developed this Transition Plan detailing how the organization will ensure that all of those facilities are accessible to all individuals.

B. 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.

C. Agency Requirements

Under Title II, the City of Saint Peter 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\(b\)\(1\)\(iv\) & \(d\)](#)].

- 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 [[28 C.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.

This document has been created to specifically cover accessibility within the public rights-of-way and does not include information on City programs, practices, or building facilities not related to public rights-of-way.

II. SELF-EVALUATION

A. Overview

The City of Saint Peter is 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 City implements these policies. The goal of the Self-Evaluation is to verify that, in implementing the City's policies and practices, the City is providing accessibility and not adversely affecting the full participation of individuals with disabilities.

The Self-Evaluation also examines the condition of the City'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 City public rights-of-way. Any barriers to accessibility identified in the Self-Evaluation and actions to remedy identified barriers are identified in this document. Pedestrian facilities were evaluated for ADA deficiencies throughout the City. Pedestrian facilities located within MN Department of Transportation (MnDOT) or Nicollet County right-of-way were not included in this evaluation unless a cost-share agreement exists between the City and those agencies for the maintenance/reconstruction of facilities.

B. Methodology

The Self-Evaluation field data inventory began in mid-May 2019 and concluded in mid-November 2019. During this time, City 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. ADA accessibility evaluation included 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 as shown in **Appendix A** of this document.

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

Rating	Criteria
1	Uniform slopes, no noticeable cracks, no vertical discontinuities, no spalling, joints intact
2	Uniform slopes, some cracks, vertical discontinuities less than 1/4", no spalling, joints intact
3	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, no detectable warnings
4	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, no detectable warnings

To achieve ADA-compliance, a pedestrian ramp must achieve a condition rating of 1 or 2 and also must exhibit the following:

- Slope is less than 8.34%
- 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, brushed concrete, etc.)

Pedestrian ramps receiving a condition rating of 3 or 4 and 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.

*A note on detectable warnings: Current guidance from the US Access Board and ADA standards require the use of truncated domes as the only acceptable detectable warning for new ramp construction. However, MnDOT does not require agencies to retrofit truncated domes into ramps where brushed concrete, exposed aggregate, or another detectable warning that was previously acceptable under standards at that time were employed. Ramps were identified as compliant if one of these types of detectable warnings were present and all other ramp elements were compliant.

Compliant and non-compliant pedestrian ramp locations are identified in **Appendix B**.

- 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, valve boxes, and locations with a narrowed PCR/PAR among others (**Appendix A**).

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

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

To achieve ADA-compliance, a sidewalk or trail must achieve a condition rating of 1 or 2 and also must exhibit the following:

- Sidewalk width is greater than 5-feet
- Cross slope is less than or equal to 2%

Sidewalk and trail segments exhibiting condition ratings of 3 or 4 and 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 pavement condition.

C. Summary

The City of Saint Peter conducted the Self-Evaluation review of programs from May-November 2019. This included an inventory of pedestrian facilities within public rights-of-way. **Figure 1** shown below provides a summary of ADA compliance among pedestrian facilities in Saint Peter.

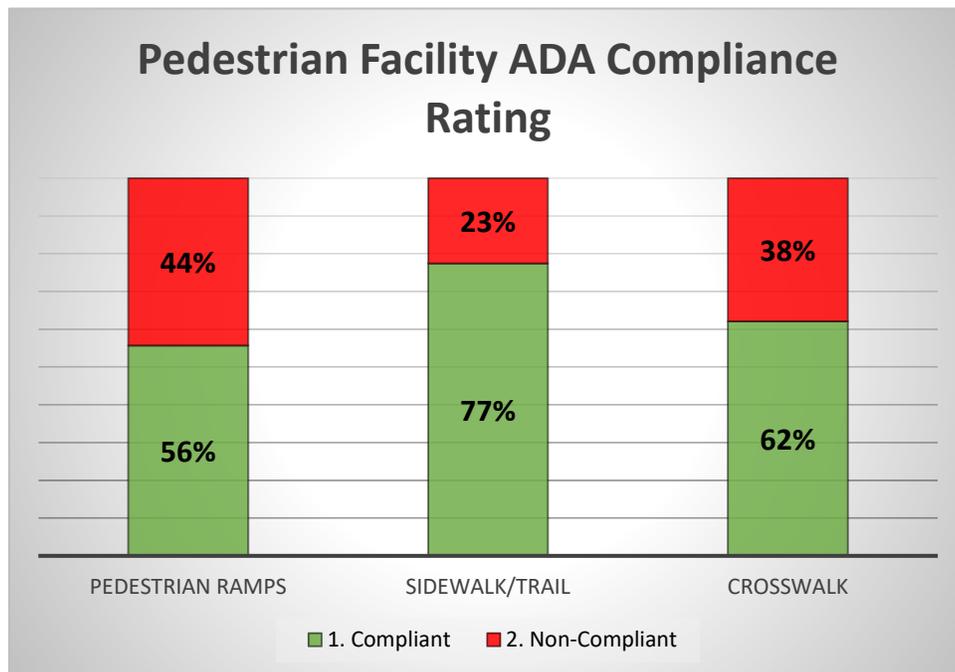


Figure 1. Pedestrian facility ADA compliance in Saint Peter resulting from the Self-Evaluation.

III. POLICIES AND PRACTICES

The City of Saint Peter is required, under Title II of the ADA and 28 CFR 35.105, to perform a self-evaluation of its policies, practices, and programs. The goal of this self-evaluation is to verify that, in implementing the policies and practices, the City is 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 City implementation of these policies. The self-evaluation examines the condition of the City's PCR/PARs and identifies any existing infrastructure needs. **Appendix B** illustrates City pedestrian infrastructure.

A. Previous Practices

Since the adoption of the ADA, the City of Saint Peter has striven to provide accessible pedestrian features as part of the City's capital improvement projects. As additional information was made available as to the methods of providing accessible pedestrian features, the City updated its procedures to accommodate these methods. The City also applied for and received grants to expand and improve existing pedestrian facilities in compliance with ADA.

B. Policy

The City of Saint Peter's goal is to continue to provide accessible pedestrian design features as part of the City's capital improvement projects. The City has established ADA design standards and procedures as listed in **Appendix G**. These standards and procedures will be kept up to date with nationwide and local best management practices.

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 Saint Peter's ADA Coordinator. Contact information for ADA Coordinator is located in **Appendix F**.

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

- City of Saint Peter Comprehensive Plan (2016)
- City of Saint Peter City Code
- City of Saint Peter Parks Master Plan (2016)
- City of Saint Peter Streets Policy - <http://www.saintpetermn.gov/streets>

New Construction

All new street construction projects with pedestrian accommodations will be designed and constructed to conform with the most current ADA guidance and design practices to the maximum extent feasible.

Reconstruction Projects

All city street reconstruction projects with pedestrian accommodations will be designed and constructed in accordance with the most current ADA guidance and design practices to the maximum extent feasible.

Rehabilitation/Resurfacing projects

All city rehabilitation and resurfacing projects will include accessible pedestrian curb ramps as needed to provide access to existing pedestrian facilities (i.e. walks/trails) at locations where they do not currently exist. Improvements to existing pedestrian ramps will be

addressed on a case by case basis. High priority areas such as those in close proximity to specific land uses (i.e. schools, government offices, and medical facilities) will be given additional consideration. Improvements will be undertaken at the discretion of the City Public Works Director.

Stand Alone Projects

As grant funding opportunities are available, independent ADA projects may be undertaken by the City. Candidate sites will be evaluated on facility condition, pedestrian volumes, public safety, public benefit and improvement costs as well as the ability to provide alternative barrier removal options.

Development Projects

As private development continues to grow, both new and reconstruction, the City of Saint Peter will require new and adjacent infrastructure to comply with ADA standards.

IV. IMPLEMENTATION PLAN

A. Priority Areas

All intersections and roadway segments in the City of Saint Peter were classified based on the following criteria:

Priority Level 1 – High Priority

- Locations exhibiting accessibility barriers identified through the public process by stakeholders and the general public.
- Locations and roadway segments serving Level 1 facilities including:
 - Government facilities (city, county, state);
 - 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**.

Priority Level 2 – Medium Priority

- Locations and roadway segments serving Level 2 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.

Priority Level 3 – Lower Priority

- Single-family residential areas;
- Industrial areas;
- Other areas not classified as Priority Level 1 and 2

The City of Saint Peter used the priority ranking outlined above to create the plan and schedule for integrating ADA compliance projects in future street projects. Reporting on the results of the Self-Evaluation is included in **Appendix B**.

B. External Agency Coordination

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

C. Cost Estimates

Planning level cost estimates were prepared for non-compliant ADA infrastructure.

Mainline Sidewalk and Trail Remediation

The condition of mainline sidewalk and trail were classified by City staff during data collection. For cost estimating purposes, an entire segment of sidewalk or trail was classified as non-compliant if it contained multiple smaller sections that were considered non-compliant and it would be more cost effective to replace the entire segment. This is common for sidewalk and trail located in the older parts of town. A planning-level cost estimate of \$8/square foot was estimated for removal and replacement of non-compliant mainline sidewalk and trail segments.

Sidewalk and trail segments that were generally ADA compliant but contained small sections that were non-compliant do not require the entire segment to be replaced. Instead, only the areas classified as non-compliant were noted. This was common with sidewalk and trail segments constructed within the last 5-15 years and generally were in good condition and ADA compliant, except for a few isolated areas. A planning level cost of \$10/square foot was estimated for repair of these isolated areas of mainline sidewalk and trail.

The area of mainline sidewalk and trail that contained barriers such as poles, hydrants, utility boxes that were too close to the PAR, or a PAR that was too narrow, were measured by the width of the walkway multiplied by the length of the barrier to the nearest 5 linear feet. The repair area was then multiplied by a unit price of \$10/square foot.

Pedestrian Ramp Remediation

Pedestrian ramps that are ADA compliant but missing some form of detectable warning (such as truncated domes, tined surface, etc.) are estimated to cost \$2,000 per ramp to install a detectable warning system while maintaining the existing concrete pedestrian ramp and landing. On the other hand, ramps that are non-compliant because of slope, vertical discontinuities, etc. require that the entire ramp be replaced. Replacing non-compliant ramps was estimated to cost \$4,000 each.

Crosswalk Remediation

Each crosswalk that was classified as non-compliant was estimated to cost \$500 each to bring into compliance.

D. Implementation Schedule

Overall, this Plan estimates \$4.8M in ADA improvements are necessary for pedestrian facilities throughout the City. This includes \$2.46M for Mainline Sidewalk and Trail Remediation, \$1.89M for Pedestrian Ramp Remediation, \$111,000 for Crosswalk

Remediation and \$347,000 for Mainline Sidewalk and Trail Barrier Remediation. The City aims to achieve ADA compliance among these facilities responsibly, and as expeditiously as possible, recognizing that \$4.8M is a significant cost.

The City will utilize three methods for upgrading pedestrian facilities to the current ADA standards. The first and most comprehensive of the three methods are 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 City staff. Lastly, the City will use site redevelopment, new development, and cooperative agreement projects to bring all adjacent pedestrian facilities into compliance.

New instances of non-compliance will surface each year as normal wear-and-tear and extreme weather take their toll on pedestrian facilities. These conditions will likely prevent any Minnesota City from achieving 100% ADA compliance among facilities. However, deficiencies have been carefully prioritized in this plan to ensure steps are taken where they matter most, and in the shortest timeframe possible. With this in mind, the City aims to improve deficiencies identified in this plan over a 30-year period, allocating on average \$160,000 annually through the project types identified above.

The City has set the following implementation goals for improving the accessibility of its pedestrian facilities within its jurisdiction:

- After 10 years, 34% of accessibility features identified in this Plan would be improved.
- After 20 years, 67% of accessibility features identified in this Plan would be improved.
- After 30 years, 100% of accessibility features identified in this Plan would be improved.

The City anticipates updating this plan every five years to capture new instances of non-compliance found and to document progress achieved since the previous plan was adopted. This plan serves as a framework for the City to follow and implementation goals will likely change as the City pursues ADA compliance.

V. ADA COORDINATOR

In accordance with 28 CFR 35.107(a), the City of Saint Peter has identified an ADA Title II Coordinator to oversee the City's policies and procedures. Contact information for this individual is in **Appendix F**.

VI. PUBLIC OUTREACH

The City of Saint Peter recognizes that public participation is an important component in the development of this document. 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 Saint Peter.

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

- Grievance Procedure:

In compliance with 28 CFR 35.107, the City has established the grievance procedure to take future comments and concerns for the City. This can be seen in **Appendix E** and is further detailed in Section VIII below.

- City Website:

A City website was established early in the process that provided the public an opportunity to submit comments on areas in the community they find problematic. The website also provided a project schedule and other project related information including plan drafts and meeting notices among other items.

This document was available for public comment online between the dates of December 13, 2019 to January 15, 2020. Information regarding the public outreach activities is in **Appendix D**.

- Public Open House:

A public open house event was held Wednesday, October 16, 2019 to solicit feedback from the public on the draft ADA Transition Plan and projects in the City that pose barriers to accessibility that weren't identified in the plan. A meeting summary can be seen in **Appendix D**.

VII. GRIEVANCE PROCEDURE

Under the Americans with Disabilities Act, each agency is required to publish its responsibilities in regard to the ADA. A draft of this public notice is provided in **Appendix E**. If users of the City of Saint Peter facilities and services believe the City has not provided reasonable accommodation, they have the right to file a grievance.

In accordance with 28 CFR 35.107(b), the City has developed a grievance procedure for the prompt and equitable resolution of citizens' complaints, concerns, comments, and other grievances. This grievance procedure is outlined in **Appendix E**.

VIII. MONITOR THE PROGRESS

This document will be updated as needed to reflect the City of Saint Peter'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 to 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 public outreach.

Appendix A: Deficiencies

I. **Appendix A: Self-Evaluation – Examples of Commonly Identified Deficiencies and Obstructions**

Figure A.1 – Commonly Identified Deficiencies



Vertical Discontinuity



Horizontal Discontinuity



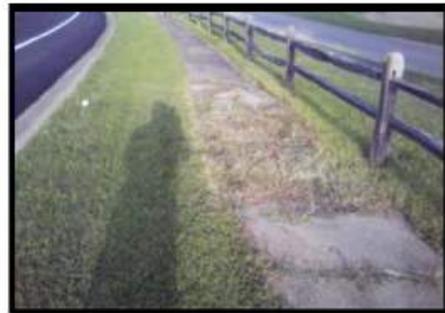
Cross Slope



Cracking



Ponding



Vegetation



Spalling



Vertical Slope

Figure A.2 – Sidewalk Obstruction Examples



Fire Hydrant



Lighting Pole



Traffic Signal Handhole



Traffic Signal Pole



Utility Pole



Water Gate Valve

Appendix B: Self Evaluation

I. Appendix B: City of Saint Peter, MN Self-Evaluation

A. Review of Policies and Practices

Policy Recommendations

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:

1. *Saint Peter Comprehensive Plan (2016)*

a) Transportation Chapter – Sidewalk Master Plan

This chapter describes the City's efforts to provide safe and effective pedestrian circulation throughout the community and between schools, parks, medical facilities and developments. The City has worked to install sidewalks throughout the community on both sides of collector streets while installing handicapped ramps on each sidewalk corner. The plan also states the construction of all new sidewalk will continue this trend by being fully handicapped accessible upon their construction to allow for the safe movement of persons with mobility impairments.

Policy Understanding and Recommended Revision:

This plan specifically addresses the City's efforts to ensure existing and newly constructed sidewalk infrastructure in the City is handicapped accessible. No barriers to accessibility were identified in this plan.

2. *Parks Master Plan (2016)*

This plan outlines the City's commitment to maintenance, renovation and enhancement of the park system. This plan specifically states that *"Safety and ADA accessibility are set as a City standard to follow when creating a successful park system. New safety issues surface annually with new solutions based on experience and new materials. Safety and ADA access have also affected park design requiring larger areas to provide ramps, added space for activities for the disabled, and added space for safety between equipment and between sports fields."*

Study Understanding and Recommended Actions

This plan specifically addresses the City's efforts to ensure ADA accessibility throughout the park system. No barriers to accessibility were identified in this plan.

3. *City of Saint Peter City Code*

This plan addresses construction guidelines and design requirements for sidewalks in the city. Article II, Division 1, Sec. 42-60 provides the requirements for repair and construction requirements. This section states that plans are required to be submitted for any sidewalk work and work will be completed under the direct supervision and inspection of the Director of Public Works in accordance with plans and specifications approved by the City.

Policy Understanding and Recommended Revision:

The Saint Peter City Code outlines the City will supervise and inspect sidewalk construction per plans and specifications approved by the City which can be viewed in Appendix G of this ADA Transition

Plan. Appendix G identifies ADA standards followed by the City. No revisions are recommended to the City Code.

4. *The City of Saint Peter Streets Policy* - <http://www.saintpetermn.gov/streets>

The City of Saint Peter City Streets page identifies residents' responsibilities for sidewalk clearance providing the following language:

"City regulations require property owners to remove snow and ice from the entire width of the sidewalk within 24 hours after the snowfall ends. If property owners don't follow the regulations, the City will provide for the sidewalk to be cleared and the property owner will be billed.

If you have a concern about a sidewalk in your area that hasn't been cleared properly, please let us know. While we will make every attempt to work with property owners on this and other issues, it is important to remove the snow and ice to ensure the safety of pedestrians."

Policy Understanding and Recommended Revision:

These requirements require the removal of barriers to accessibility to allow sidewalks to remain safe for pedestrians. No barriers to accessibility were identified in this policy.

B. Review of Programs

The City of Saint Peter inventoried pedestrian ramps and sidewalks within the public rights-of-way beginning in mid-May of 2019 and ending in November 2019. The following provides the results of that inventory:

1. Pedestrian Ramps

The City of Saint Peter has 1083 locations where pedestrian ramps exist or should exist within its public rights-of-way. These locations were inventoried for ADA accessibility based on (1) whether a pedestrian ramp was present and (2) if accessibility criteria outlined in **Part 1 Sec. III** were met. 603 (56%) of the locations were reported to be compliant and 480 (44%) were reported to be non-compliant.

2. Sidewalks/Trails

The sidewalks and trails within the City of Saint Peter public rights-of-way were inventoried and evaluated to determine existing accessibility with ADA and to identify existing obstructions based on accessibility criteria outlined in **Section II** of this transition plan. Of the nearly 52 miles of sidewalk evaluated, roughly 12 miles (23%) had a condition rating of three or four meaning they exhibited instances of non-accessibility along their length and require further evaluation and remedial action.

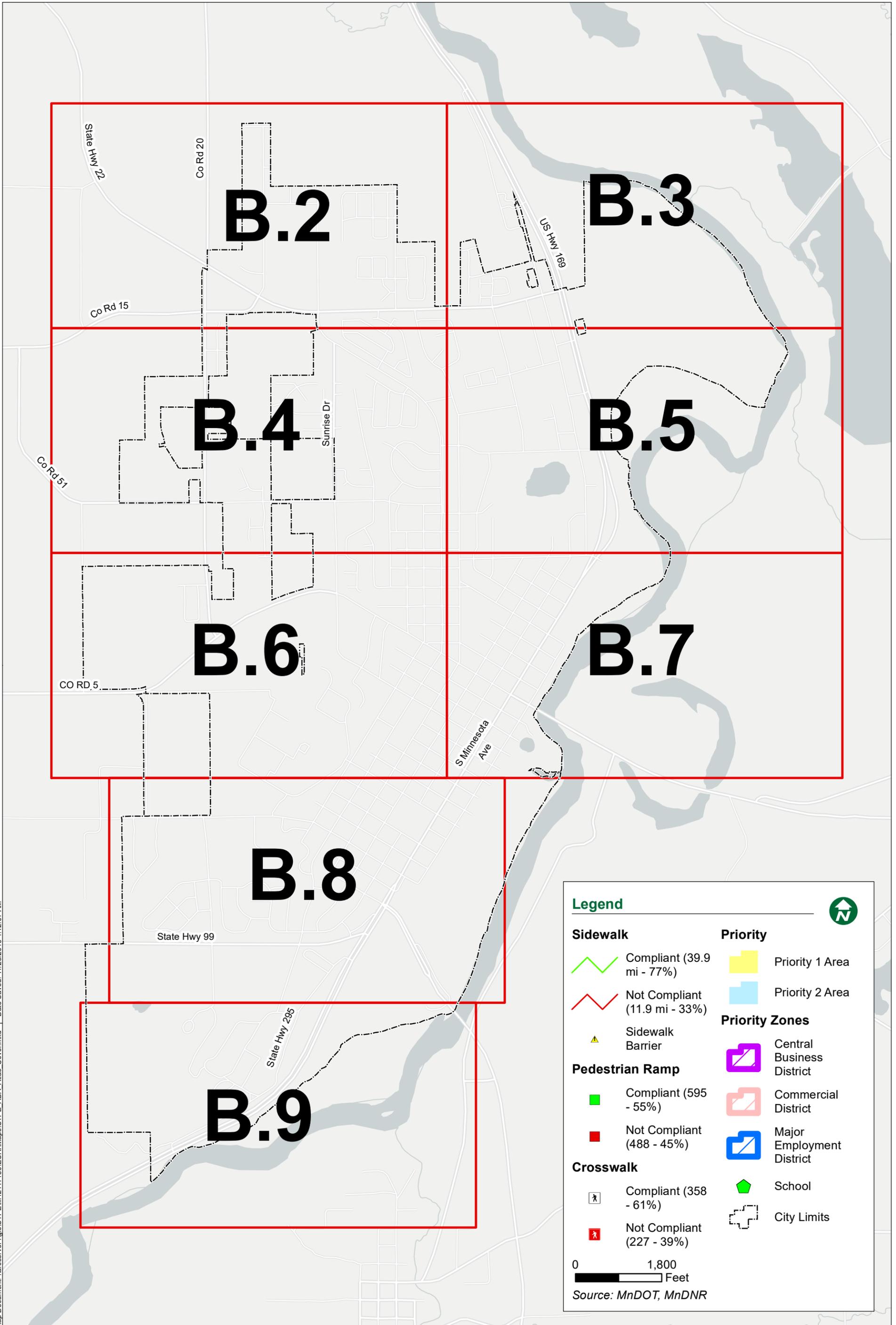
3. Crosswalks

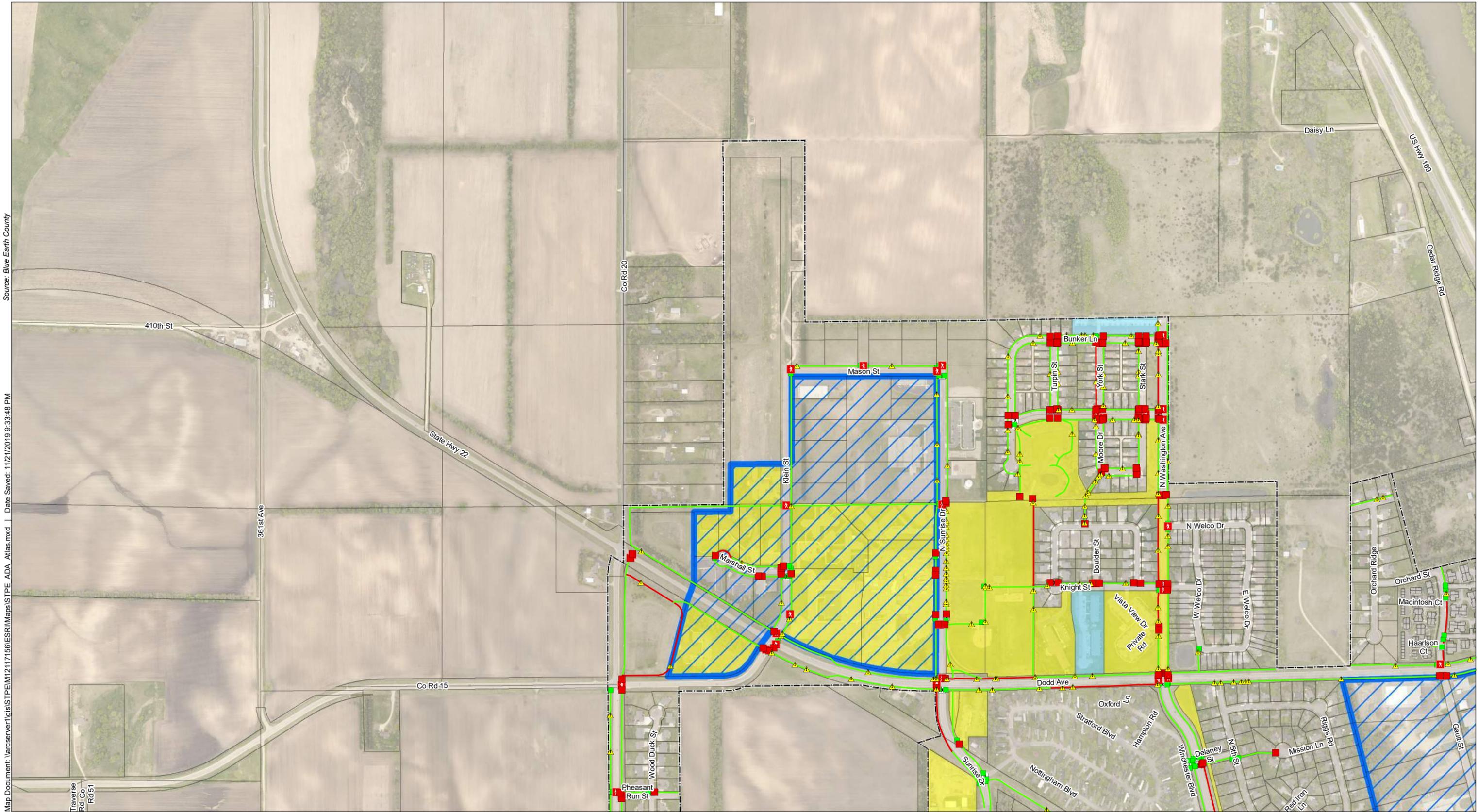
Crosswalks were inventoried and evaluated for the quality of markings. Of 585 crosswalks evaluated, 222 (38%) were identified as non-compliant due to markings that were faded or partially removed or because pavement within the crossing exhibited deficiencies.

Compliant and non-compliant pedestrian infrastructure is illustrated in **Figures B.1 through B.9**. The timeline for replacement of these sidewalks and trails 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 Saint Peter ADA Coordinator (**Appendix F**).

Table B.1 provides an implementation plan for the prioritized removal of barriers to accessibility throughout the City as identified in this plan.





Source: Blue Earth County

Map Document: \arcserver1\gis\STPE\12117156\ESRI\Maps\STPE_ADA_Atlas.mxd | Date Saved: 11/21/2019 9:33:48 PM

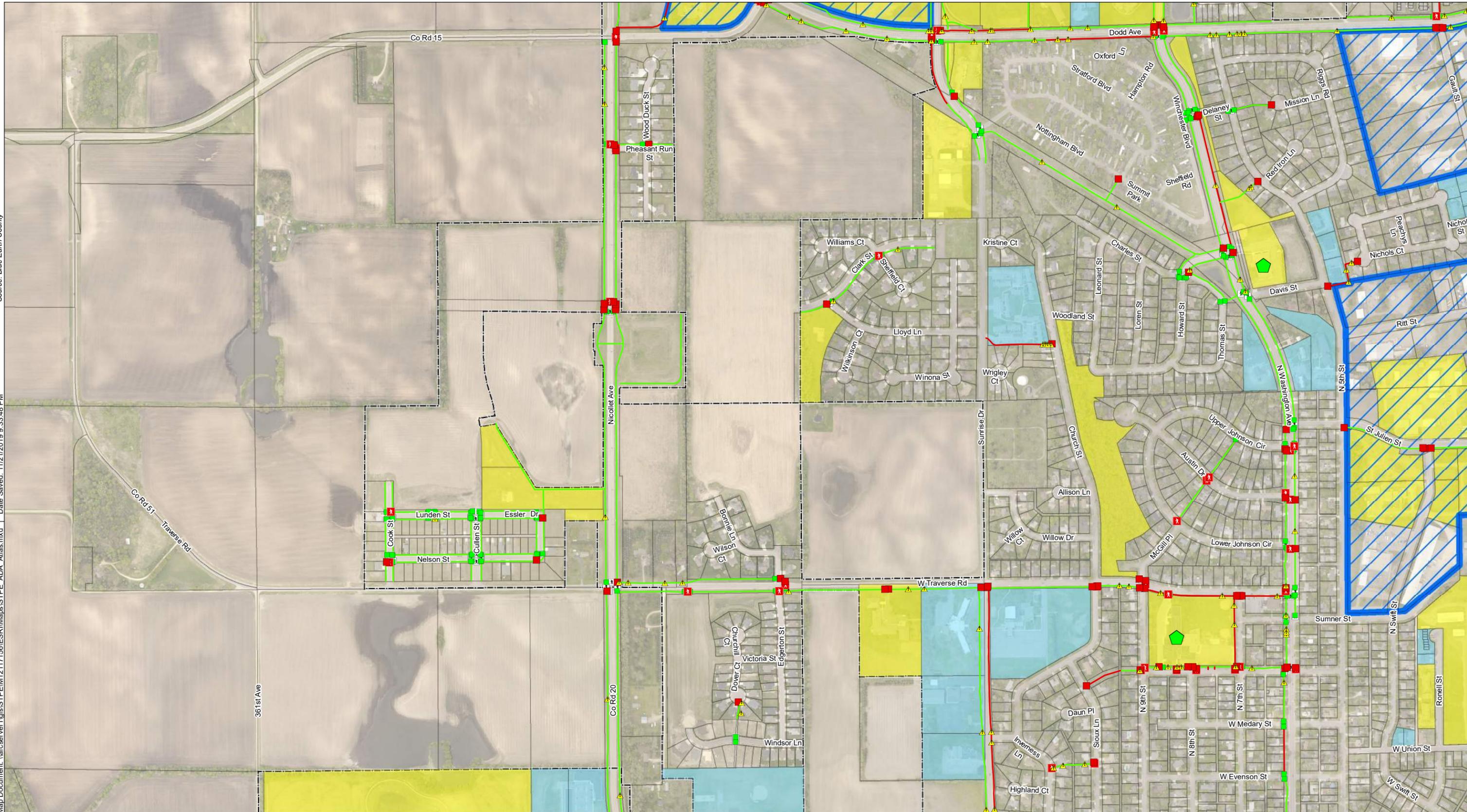
- Figure B.2 -

0 500 Feet



Source: Blue Earth County

Map Document: \arcserver1\gis\STPE\Map12117156\ESRI\Maps\STPE_ADA_Alias.mxd | Date Saved: 11/21/2019 9:33:48 PM



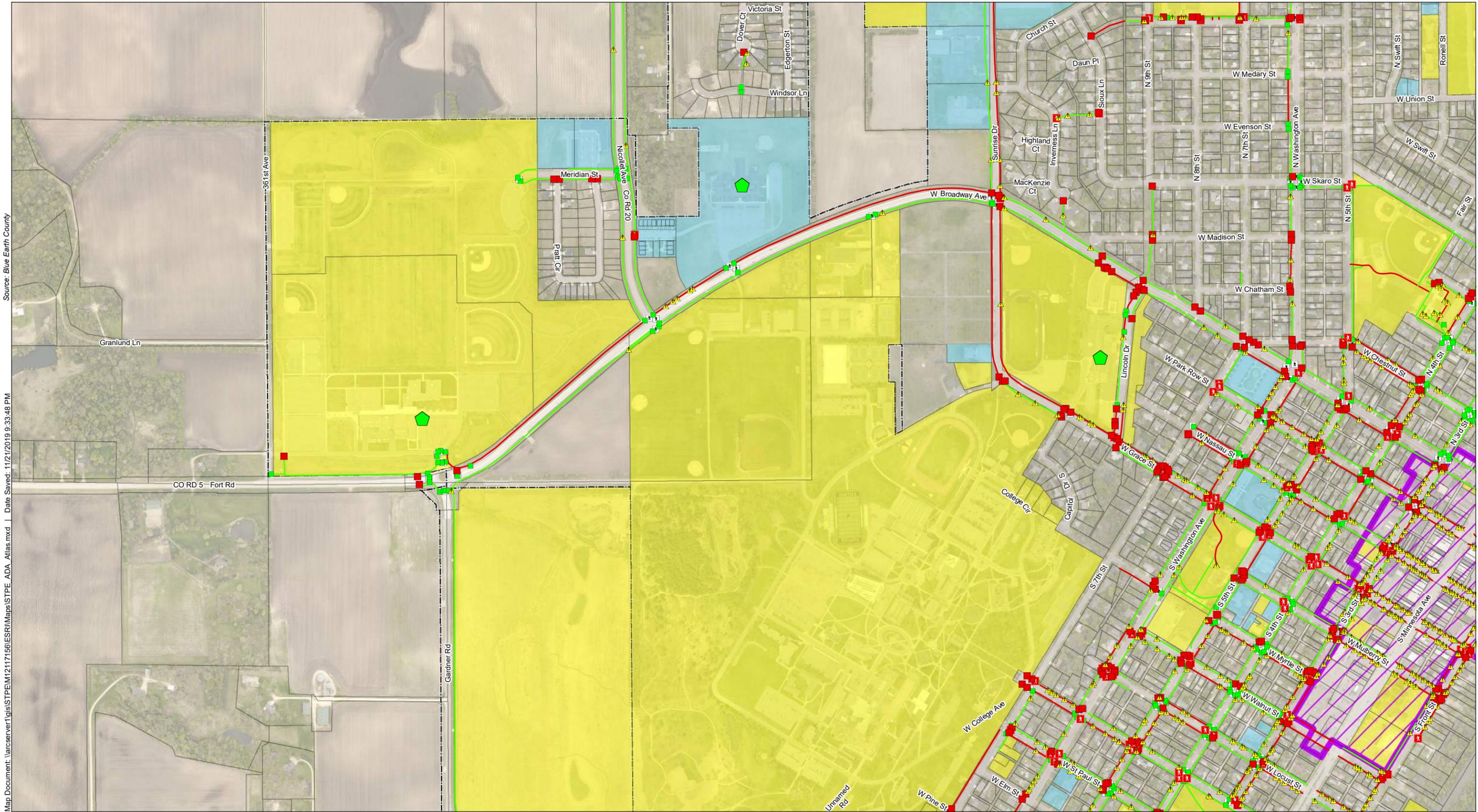
- Figure B.4 -

0 500 Feet





- Figure B.5 -

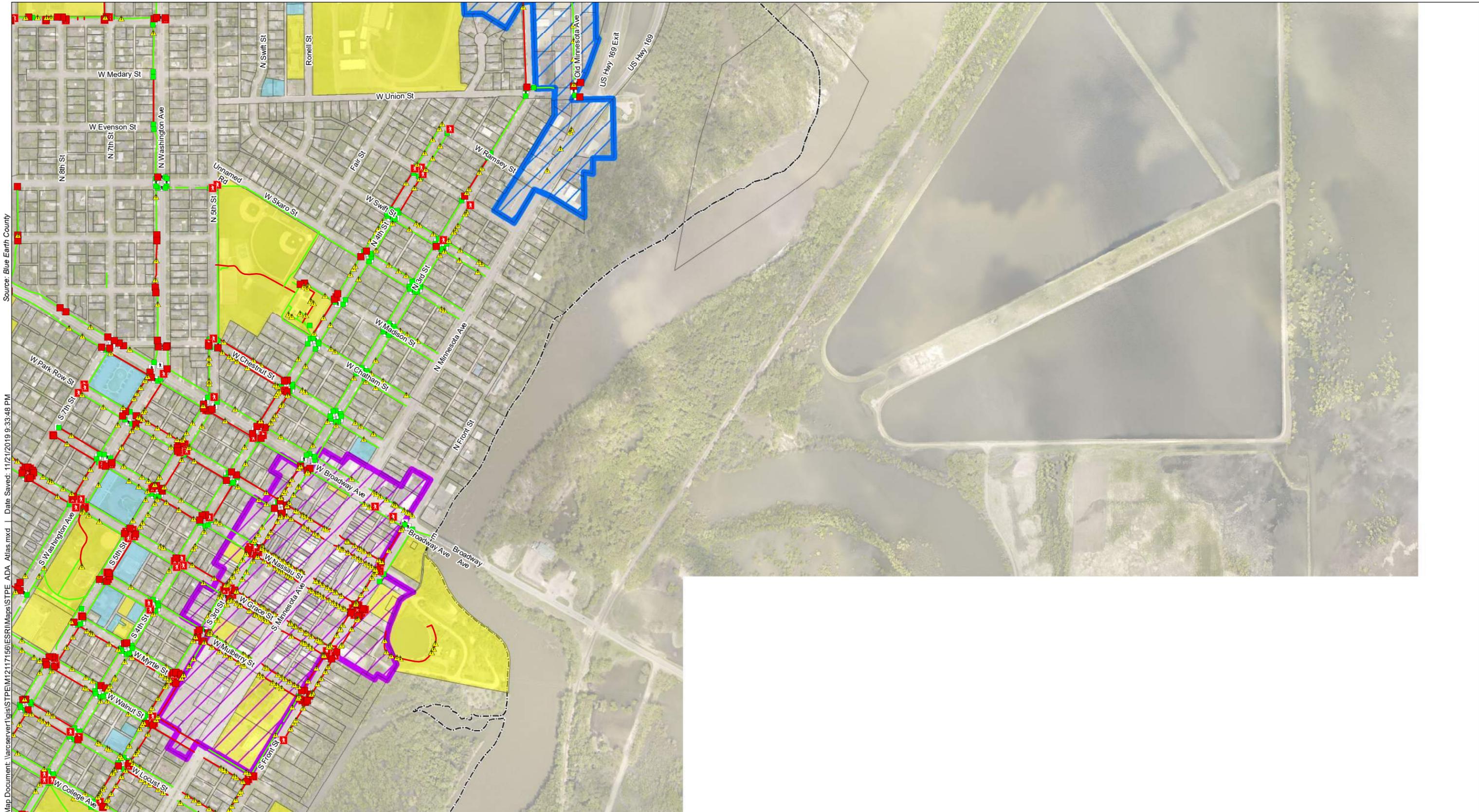


- Figure B.6 -

Source: Blue Earth County

Map Document: \arcserver1\gis\STPE\117156\ESRI\Maps\STPE_ADA_Alias.mxd | Date Saved: 11/21/2019 9:33:48 PM

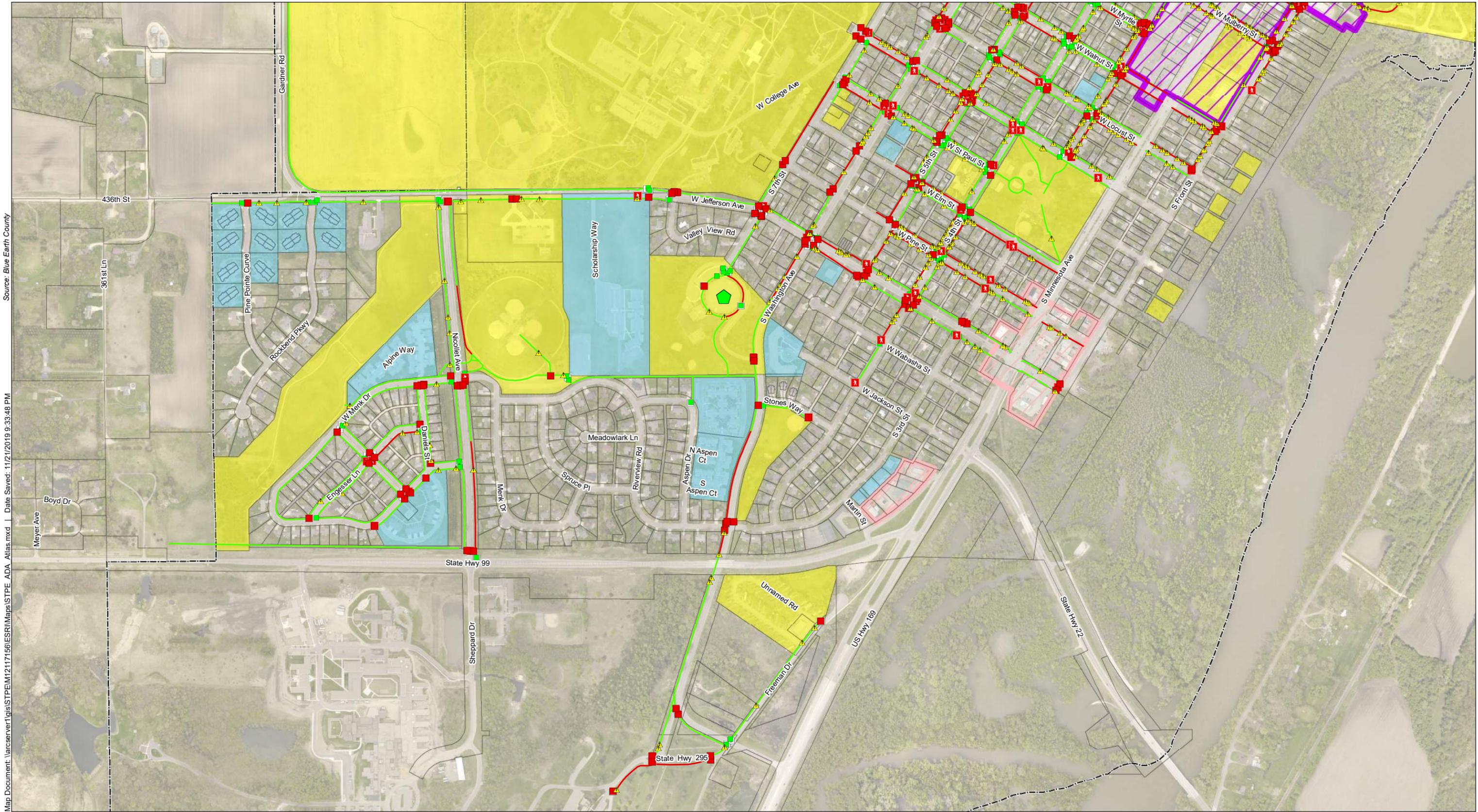




Map Document: \\arcserver1\gis\STPE\12117156\ESRI\MapServer\STPE ADA Atlas.mxd | Date Saved: 11/21/2019 9:33:48 PM | Source: Blue Earth County

- Figure B.7 -

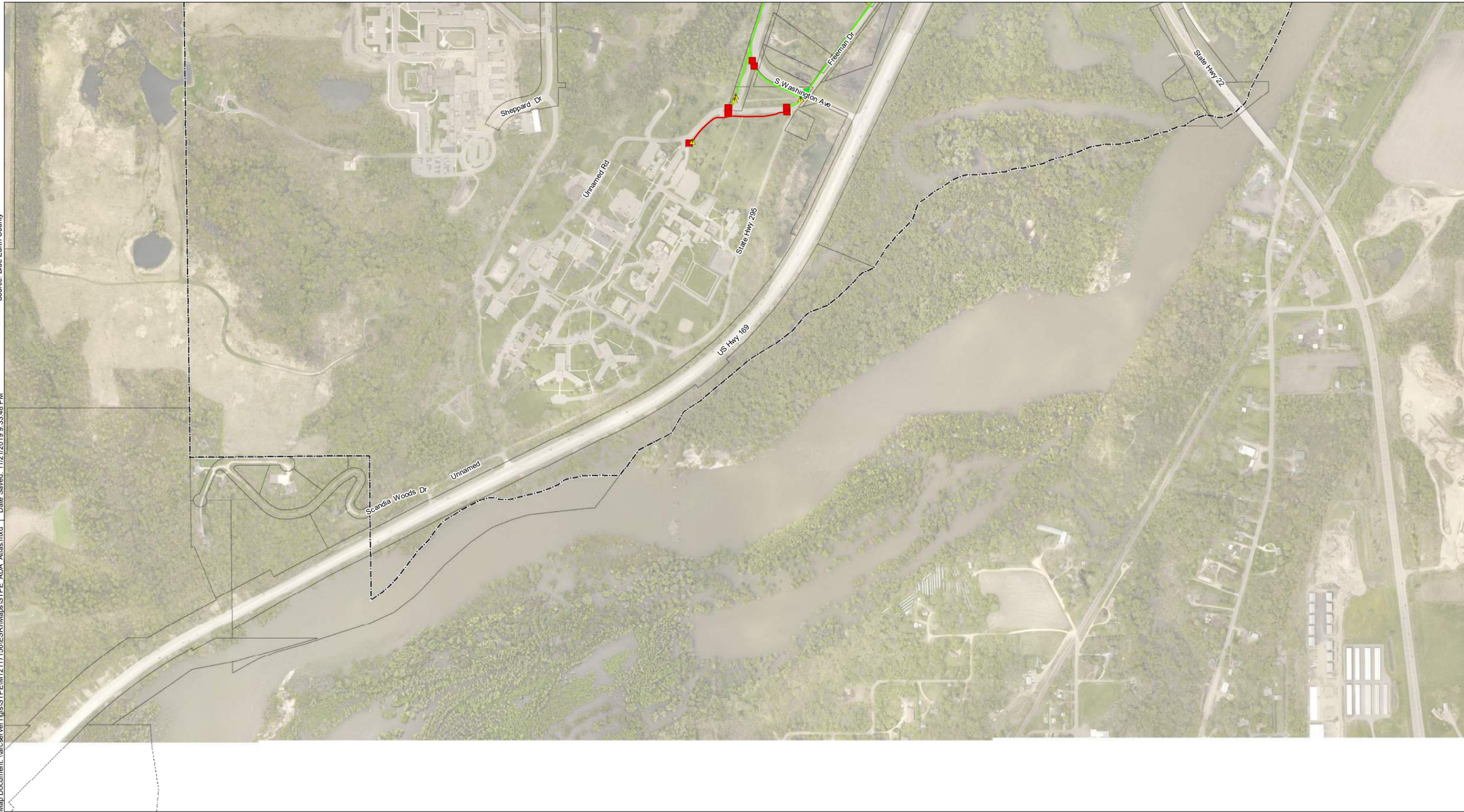




Map Document: \\arcserver1\gis\STPE\Map12117156\ESRI\Maps\STPE_ADA_Atlas.mxd | Date Saved: 11/21/2019 9:33:48 PM | Source: Blue Earth County

- Figure B.8 -

Source: Blue Earth County
Map Document: \\arcserver1\gis\STPEM\12117156\ESRI\Maps\STPE_ADA_Alias.mxd | Date Saved: 11/21/2019 9:33:48 PM



- Figure B.9 -

Table B.1. City of Saint Peter Program Review - Implementation Plan

Location	Land Use	Sidewalk/Trail Remediation Cost	Pedestrian Ramp Remediation Cost	Crosswalk Remediation Cost	Sidewalk/Trail Barriers Remediation Cost	Total Cost	Priority Level	Term
Co Rd 20	Schools; Government Facilities; Housing complexes, including apartments; Parks	50853	16000	2000	3500	72353	1	Short Term
W Walnut St	Schools; Government Facilities	59880	28000	3000	9000	99880	1	Short Term
St Julien St	Schools; Government Facilities	0	20000	0	1000	21000	1	Short Term
W Mulberry St	Schools; Churches and Places of Worship; Government Facilities; Public Housing and Homeless Shelters	42544	48000	1000	4000	95544	1	Short Term
Sunrise Dr	Schools; Central business districts, shopping malls, supermarkets and strip retail centers; Churches and Places of Worship; Government Facilities; Hospitals, Health Clinics, and Medical Facilities (Public and Private); Parks; Public Housing and Homeless Shelters	214104	52000	1500	1500	269104	1	Short Term
W Broadway Ave	Schools; Colleges; Government Facilities; Hospitals, Health Clinics, and Medical Facilities (Public and Private); Housing complexes, including apartments; Parks	220279	48000	1500	14750	284529	1	Short Term
W Nassau St	Schools; Government Facilities; Housing complexes, including apartments	102867	52000	5000	5750	165617	1	Short Term
N Washington Ave	Schools; Churches and Places of Worship; Housing complexes, including apartments; Parks; Public Housing and Homeless Shelters	83036	166000	8000	16000	273036	1	Short Term
S 4th St	Schools; Churches and Places of Worship; Parks; Public Housing and Homeless Shelters	65436	100000	11500	12750	189686	1	Short Term
W Myrtle St	Schools; Churches and Places of Worship; Public Housing and Homeless Shelters	36845	42000	2000	2750	83595	1	Short Term
W Traverse Rd	Schools; Churches and Places of Worship; Public Housing and Homeless Shelters	39010	34000	3000	8750	84760	1	Short Term
Short-Term (2020-2029) Totals		\$914,854	\$606,000	\$38,500	\$79,750	\$1,639,104	-	Short-Term
W Jefferson Ave	Schools; Churches and Places of Worship; Colleges; Housing complexes, including apartments; Parks	30459	42000	3000	15250	90709	1	Mid-Term
S 7th St	Schools; Colleges; Housing complexes, including apartments	44726	116000	5500	8500	174726	1	Mid-Term
W Grace St	Schools; Colleges; Housing complexes, including apartments; Parks	116629	60000	5000	8500	190129	1	Mid-Term
Jefferson Park	Schools; Parks	20673	0	0	0	20673	1	Mid-Term
Ramsey Park	Schools; Parks	0	0	0	1250	1250	1	Mid-Term
Jefferson Field	Schools; Housing complexes, including apartments; Parks	0	2000	0	500	2500	1	Mid-Term
N 5th St	Schools; Housing complexes, including apartments; Parks	15258	16000	2000	2750	36008	1	Mid-Term
Gorman Park	Schools; Parks	16321	0	0	0	16321	1	Mid-Term
W Madison St	Schools; Parks	0	20000	500	4250	24750	1	Mid-Term
Meridian St	Schools; Housing complexes, including apartments; Parks	0	10000	0	0	10000	1	Mid-Term
Stones Way	Schools; Parks	0	4000	500	0	4500	1	Mid-Term
S 5th St	Schools; Churches and Places of Worship; Housing complexes, including apartments; Parks	90153	176000	11000	13500	290653	1	Mid-Term
Nicollet Ave	Schools; Housing complexes, including apartments; Parks	33994	60000	3500	3750	101244	1	Mid-Term

Table B.1. City of Saint Peter Program Review - Implementation Plan

Location	Land Use	Sidewalk/Trail Remediation Cost	Pedestrian Ramp Remediation Cost	Crosswalk Remediation Cost	Sidewalk/Trail Barriers Remediation Cost	Total Cost	Priority Level	Term
S Washington Ave	Schools; Housing complexes, including apartments; Parks	130292	108000	4500	14500	257292	1	Mid-Term
W Park Row St	Schools; Housing complexes, including apartments	102908	52000	1000	5750	161658	1	Mid-Term
Inverness Ln & Sioux Ln Trail	Schools	0	0	0	1500	1500	1	Mid-Term
Thomas St	Schools	0	4000	0	0	4000	1	Mid-Term
N 7th St	Schools	21002	20000	1500	0	42502	1	Mid-Term
CO RD 5 & Gardner Rd	Schools	0	0	0	250	250	1	Mid-Term
Lincoln Dr & W Broadway Ave	Schools	1445	0	0	0	1445	1	Mid-Term
Lincoln Dr	Schools	27150	52000	1000	500	80650	1	Mid-Term
Howard St	Schools	0	0	0	250	250	1	Mid-Term
CO RD 5	Schools	0	8000	0	0	8000	1	Mid-Term
Dover Ct	Schools	0	2000	0	0	2000	1	Mid-Term
Sioux Ln & N 9th St Trail	Schools	10825	0	0	250	11075	1	Mid-Term
W Flandrau St	Schools	1333	24000	2000	4000	31333	1	Mid-Term
Mid-Term (2300-2039) Totals		\$663,168	\$776,000	\$41,000	\$85,250	\$1,565,418	-	Mid-Term
W Pine St	Schools	93292	0	1000	2750	97042	1	Long-Term
Sunrise Dr & N Washignton Ave Trail	Schools	0	0	0	750	750	1	Long-Term
Edgerton St & W Traverse Rd	Schools	2231	0	0	0	2231	1	Long-Term
Nichols Ct	Schools	0	4000	0	0	4000	1	Long-Term
Inverness Ln	Schools	0	4000	0	0	4000	1	Long-Term
Mission Ln	Schools	0	4000	0	0	4000	1	Long-Term
High School	Schools	0	4000	0	0	4000	1	Long-Term
Summit Park & Nottingham Blvd & Cambrid	Schools	0	4000	0	0	4000	1	Long-Term
Sioux Ln	Schools	0	8000	0	0	8000	1	Long-Term
Stark St	Schools	0	0	0	1750	1750	1	Long-Term
Austin Dr	Schools	0	0	1000	0	1000	1	Long-Term
McGill Pl & Lower Johnson Cir	Schools	0	0	500	0	500	1	Long-Term
Inverness Ln	Schools	0	0	500	0	500	1	Long-Term
Sioux Ln	Schools	0	0	500	0	500	1	Long-Term
Nelson St	Schools	0	4000	500	500	5000	1	Long-Term
Turpin St	Schools	0	24000	0	1750	25750	1	Long-Term
W Chatham St	Schools	0	0	0	3250	3250	1	Long-Term
Lunden St	Schools	0	0	500	0	500	1	Long-Term
Hallett's Pond	Government Facilities	0	0	0	250	250	1	Long-Term
S Front St	Government Facilities; Parks	99056	4000	1000	2000	106056	1	Long-Term
S 3rd St	Churches and Places of Worship; Government Facilities	91795	10000	2500	25750	130045	1	Long-Term
Klein St	Hospitals, Health Clinics, and Medical Facilities (Public and Private); Public Housing and Homeless Shelters	0	16000	2000	1250	19250	1	Long-Term
Dodd Ave	Hospitals, Health Clinics, and Medical Facilities (Public and Private); Housing complexes, including apartments; Parks; Public Housing and Homeless Shelters	57329	54000	4500	26750	142579	1	Long-Term
N Sunrise Dr	Hospitals, Health Clinics, and Medical Facilities (Public and Private); Parks; Public Housing and Homeless Shelters	0	36000	2000	6750	44750	1	Long-Term
Marshall St	Public Housing and Homeless Shelters	6270	12000	0	500	18770	1	Long-Term

Table B.1. City of Saint Peter Program Review - Implementation Plan

Location	Land Use	Sidewalk/Trail Remediation Cost	Pedestrian Ramp Remediation Cost	Crosswalk Remediation Cost	Sidewalk/Trail Barriers Remediation Cost	Total Cost	Priority Level	Term
W Elm St	Housing complexes, including apartments; Parks; Public Housing and Homeless Shelters	51816	0	0	1500	53316	1	Long-Term
GAULT PARK	Parks; Public Housing and Homeless Shelters	25432	8000	0	5500	38932	1	Long-Term
W St Paul St	Colleges; Housing complexes, including apartments; Public Housing and Homeless Shelters	14521	0	0	7500	22021	1	Long-Term
Freeman Dr	Public Housing and Homeless Shelters	0	12000	0	750	12750	1	Long-Term
Sunrise Dr & Church St Trail	Public Housing and Homeless Shelters	19924	0	0	0	19924	1	Long-Term
W Skaro St	Parks	0	4000	0	2250	6250	1	Long-Term
Minnesota Square Park	Parks	0	0	0	750	750	1	Long-Term
Knight St	Parks	0	24000	500	1750	26250	1	Long-Term
W College Ave	Parks	43213	0	500	4750	48463	1	Long-Term
N 4th St	Parks	66392	18000	2500	25750	112642	1	Long-Term
Moore Dr & Rock Ridge Ln Trail	Parks	0	0	0	3250	3250	1	Long-Term
Bunker Ln	Housing complexes, including apartments; Parks	0	64000	500	8750	73250	1	Long-Term
Clark St	Parks	0	4000	500	1000	5500	1	Long-Term
Moore Dr	Parks	0	56000	5000	3250	64250	1	Long-Term
Mill Pond Park	Parks	30666	0	0	0	30666	1	Long-Term
Bassford St	Parks	0	0	0	3750	3750	1	Long-Term
W Menk Dr	Housing complexes, including apartments; Parks	0	48000	1500	2000	51500	1	Long-Term
Essler Dr	Parks	0	4000	0	0	4000	1	Long-Term
VETERANS MEMORIAL PARK	Parks	40531	4000	0	1250	45781	1	Long-Term
W Chestnut St	Churches and Places of Worship; Parks	46455	0	0	2750	49205	1	Long-Term
W Locust St	Churches and Places of Worship	59176	0	0	7750	66926	2	Long-Term
N 3rd St	Major Employment District	46035	20000	1000	6750	73785	2	Long-Term
W Union St	Major Employment District	0	12000	0	0	12000	2	Long-Term
Wettergren St	Housing Complexes, including apartments	0	12000	1000	0	13000	2	Long-Term
Mason St	Major Employment District	0	0	500	1000	1500	2	Long-Term
Gault St	Major Employment District	21740	0	0	0	21740	2	Long-Term
Daniels St	Housing Complexes, including apartments	0	4000	0	1000	5000	2	Long-Term
York St	Housing Complexes, including apartments	19781	0	0	3500	23281	2	Long-Term
Old Minnesota Ave	Major Employment District	0	8000	500	1750	10250	2	Long-Term
Church St	Housing Complexes, including apartments	0	4000	0	0	4000	2	Long-Term
N Welco Dr	Other	0	0	0	500	500	3	Long-Term
S 5th St & W Locust St	Other	0	0	0	750	750	3	Long-Term
Pheasant Run St	Other	0	2000	0	0	2000	3	Long-Term
State Hwy 295	Other	31912	10000	1000	1000	43912	3	Long-Term
W Swift St	Other	0	0	0	5500	5500	3	Long-Term
Engesser Ln	Other	16507	0	0	1500	18007	3	Long-Term
Rock Ridge Ln	Other	0	4000	0	0	4000	3	Long-Term
Long-Term (2040-2049) Totals		\$884,074	\$510,000	\$31,500	\$181,500	\$1,607,074	-	Long-Term
Saint Peter ADA Facilities Totals		\$2,462,096	\$1,892,000	\$111,000	\$346,500	\$4,811,596	-	-

* Each pedestrian crossing signal push button was inventoried as an individual location to be evaluated for APS technology.

Appendix C: ADA Transition Plan Projects
referenced from the City of Saint Peter Capital
Improvements Plan

I. Appendix C: City of Saint Peter Capital Improvements Projects that Include (Consider) Accessible Pedestrian Infrastructure

1. Potential Capital Improvements Projects

The City of Saint Peter's completes various capital improvement projects annually. Potential future projects are listed below.

2. State Transportation Improvement Program

There are two projects for MnDOT in the City of Saint Peter scheduled in the State Transportation Improvement Program (STIP) which are listed below.

CIP Area	Proposed Improvements	Year
Reconstruction	N 3 rd Street between Skaro and Livermore Street	2020
Reconstruction	N 3 rd Street from Julien Street to the north about 900 feet	2020
Mill & Overlay	Annual Mill & Overlay – 2-5 blocks of City roadway	Annual
STIP Project (SP)	Proposed Improvements	Year
5206-31	MN 99, FROM BIRCH ST IN NICOLLET TO THE S JCT US 169 IN ST PETER, MILL AND OVERLAY, REPLACE BR 4596 WITH NEW BR, LIGHTING AND ADA & ON TH 169 FROM JEFFERSON AVE TO S JCT TH 22 MILL & OVERLAY	2021
5209-81	US169, FROM S JCT TH 99 TO UNION STREET IN ST PETER, MILL & OVERLAY NB LANES AND CONSTRUCT DUAL LEFT TURN LANES AT S JCT TH 22	2022

The City will continue to implement infrastructure and maintenance improvements as part of its CIP 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 D: Public Outreach Results

I. Appendix D: Public Outreach Results

Input from the community has been gathered and used to help define priority areas for improvements within the City of Saint Peter public rights-of-way. Public outreach for the creation of this document consisted of the following activities:

- City Website:

A City website was established early in the process that provided the public an opportunity to submit comments on areas in the community they find problematic. The website also provided a project schedule and other project related information including plan drafts and meeting notices among other items.

This document was available for public comment online between the dates of December 13, 2019 to January 15, 2020.

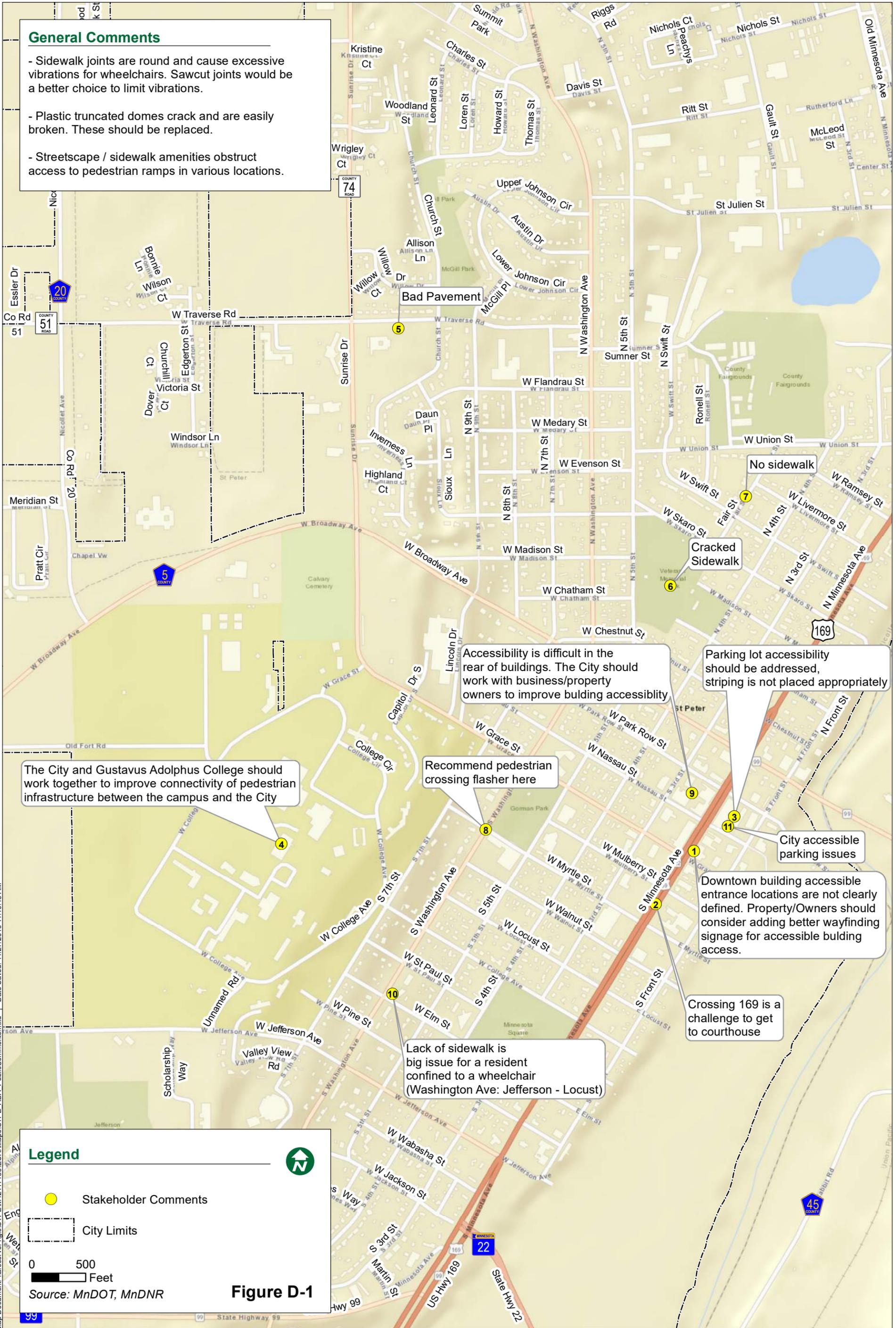
- Public Open House:

A public open house event was held Wednesday, October 16, 2019 to solicit feedback from the public on the draft ADA Transition Plan and projects in the City that pose barriers to accessibility that weren't identified in the plan. A meeting summary can be seen in **Figure D.1** below.

- Outreach to Local Stakeholder Groups:

Various community groups were contacted early in the process that include or represent those with disabilities in the Saint Peter community. The following is a full list of stakeholders contacted as part of this planning effort.

- Assisted Living Facilities
 - Benedictine Living Community (Benedictine Health Services)
 - Prairie Hill & Sand Hill (Ecumen)
 - Pheasants Ridge
 - Heritage Meadows
 - Sunrise Meadows Homes
- Gustavus Adolphus College - Accessibility Resources
- Saint Peter Senior Center – LIFE
- Shiloh's Hope
- Statewide Health Improvement Partnership
- Nicollet County Human Services
- Saint Peter Residents with Disabilities



Appendix E: Grievance Procedure

I. Appendix E: City of Saint Peter ADA Grievance Procedure

In accordance with 28 CFR 35.107(b), the City of Saint Peter 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 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 Saint Peter may do so by one of the following methods:

A. Internet

Visit the City's website to access an interactive pdf form or download a paper copy of the grievance form.

The City of Saint Peter Website: <http://www.saintpetermn.gov/>

B. Telephone

Contact the City of Saint Peter's ADA Coordinator listed in the Contact Information section of **Appendix 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.

C. Paper Submission

A paper copy of the City's grievance form is available by request from the City of Saint Peter ADA Coordinator (contact information in **Appendix F**). Complete the form and submit it to the City 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 Saint Peter'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. City staff will contact the citizen to discuss the investigation and proposed resolution.

The City of Saint Peter 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 Saint Peter.

Accordingly, the resolution by the City of Saint Peter 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 Saint Peter shall maintain ADA grievance files on behalf of the City for a period of seven years.

The City of Saint Peter, MN ADA Grievance Form

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

Pete Moulton
The City of Saint Peter Public Works – ADA Coordinator
405 W. St. Julien St.
Saint Peter, MN 56082

Or it can be e-mailed to: angieg@saintpetermn.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: _____

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 F: Contact Information

I. Appendix F: Responsible Officials and Key Staff

A. Responsible Officials Contact Information

1. City of Saint Peter ADA Coordinator:

Pete Moulton, City of Saint Peter Public Works Director

405 W. St. Julien St.

Saint Peter, MN 56082

P: (507) 934-0670

E: angieg@saintpetermn.gov

2. City of Saint Peter Key ADA Staff:

Jeff Knutson, City of Saint Peter Water Resources Superintendent

405 W. St. Julien St.

Saint Peter, MN 56082

P: (507) 934-0670

E: jeffk@saintpetermn.gov

Appendix G: ADA Design Standards and Procedures

I. Appendix G: ADA Design Standards and Procedures

A. Design Standards

1. 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/>).

2. 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>.

3. 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>.

4. 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 Road Design Manual serves as a uniform design guide for engineers and technicians working on MnDOT projects. The document is available to others 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.

B. Design Procedures

1. Intersection Corners

The City of Saint Peter 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.

2. Sidewalks / Trails

The City of Saint Peter 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.