

Mankato/North Mankato Area Planning
Organization (MAPO)

ADA - Transition Plan & Inventory for Public Rights-of-Way



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MAPO ADA TRANSITION PLAN AND INVENTORY

PART 1 – MAPO PARTNER AGENCY REQUIREMENTS AND PROJECT PURPOSE

I. INTRODUCTION

A. 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.

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, 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 [[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.

D. 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 2,710. The city contains:

- 8.2 miles of sidewalk and trail

- 109 pedestrian ramps
- 8 crosswalks.
- **Part 3 – The City of Mankato ADA Transition Plan and Inventory**
Mankato has an estimated population of 40,900. The city contains:
 - 175 miles of sidewalk and trail
 - 3014 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 13,450. The city contains:
 - 65 miles of sidewalk and trail
 - 1000 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 300. 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 66,500. 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:
 - 49 miles of sidewalk and trail
 - 780 pedestrian ramps.
 - 90 traffic signal push buttons
 - 86 crosswalks
- **Part 7 – Nicollet County ADA Transition Plan and Inventory**
Nicollet County has an estimated population of 34,000. 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:
 - 10 miles of sidewalk and trail
 - 160 pedestrian ramps.
 - 32 crosswalks

This document has been created to allow MAPO and its partner agencies to meet FHWA and 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.

II. PUBLIC PARTICIPATION

A. 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.

B. 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:

1. MAPO Conference Calls: MAPO and partner agencies met via bimonthly teleconference to coordinate for project management initiatives. There were eight conference calls through the duration of the project.
2. 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.
3. 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.
4. Stakeholder Meetings: Area stakeholders were contacted early in the process to gain an understanding of challenges groups or individuals face when accessing pedestrian infrastructure in public rights-of-way. This included individuals with disabilities, groups representing and assisting individuals

with disabilities, representatives from assisted living facilities, residents of area apartment complexes, etc. Various meetings were held with stakeholder groups in open house format as well as onsite meetings between project staff and specific individuals and groups. A stakeholder email list was set up to ensure continued communication with stakeholders throughout the process.

5. Public Notice: Other methods for public outreach were also employed including:
 - a. 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.
 - b. 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

III. SELF-EVALUATION

A. Program Review - Infrastructure Data Collection

1. 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.

2. Methodology

The Self-Evaluation field data inventory began in mid September 2017 and ended in late August 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. 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 as shown in **Appendix 1-B** of this document.

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

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

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

- Running slope is less than or equal to 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)

Pedestrian ramps receiving a condition rating of 3 or 4 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 \$4,000 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 (**Appendix 1-B**).

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

- 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:

- Slope is less than 8.34%
- 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 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. Ratings of 1 and 2 are generally compliant stops and ratings of 3 and 4 are non-compliant. 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.

3. Collection Timeframes

The following outlines the timeframes of each agency's Self-Evaluation:

- **Eagle Lake:** September 2017 – October 2017
- **Nicollet County:** October 2017 – November 2017
- **Skyline:** November 2017
- **North Mankato:** November 2017 – June 2018
- **Blue Earth County:** December 2017 – December 2018
- **Mankato:** June 2018 – August 2018

B. Policies 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.

1. 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.

2. 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.

IV. IMPLEMENTATION

A. Priority Areas

All intersections and roadway segments in MAPO partner agency jurisdictions 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);
 - 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.**

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

MAPO partner agencies used the priority ranking outlined above to create the plan and schedule for integrating ADA compliance projects in future street projects. Projects were broken down by street and distributed by priority level to create a fiscally responsible implementation (transition) plan for agencies to appropriately budget. The highest priority identified on a street defined the priority level for that street overall. For example, if a section of a street was within one-quarter mile of a school, the whole street received a priority level 1.

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 have cost participation policy 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. The counties will work with each community in their jurisdiction to implement improvements identified in their respective transition plans.

B. 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.

C. 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.

D. 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 2018 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	\$4,000
Traffic control signal APS upgrade retrofit	APS Equip.	\$15,000
Traffic control signal APS as part of new signal installation	APS Equip.	\$10,000
Sidewalk/Trail ADA improvement retrofit	Sq. Ft.	\$5.00
Bus Stop/Shelter ADA improvement retrofit	Bus Stop	\$4,000

E. 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).

V. 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.

VI. 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.

VII. 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 - 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 1-A: Public Participation

Appendix 1-A.1: Public Outreach (Stakeholders) Contact List

I. Public Outreach Contact List

Various groups representing individuals with disabilities were contacted and notified about this process and were provided an opportunity to attend meetings and provide comments on the various agency websites. The following is a listing of the groups contacted throughout the process for all agencies:

- SMILES Center for Independent Living (CIL)
- Region 9 Development
- Blue Earth and Nicollet Counties
 - Blue Earth County Human Services
 - Hearing Loss Support Group
 - Minnesota Valley Action Council
 - MRCI Work Source
 - Lifeworks
 - Leisure Education for Exceptional People (LEEP)
 - Minnesota Autism Center
 - Community Education Access Program
 - Community Transition Interagency Committee
- Legalaid
- Minnesota State University, Mankato Accessibility Resources Group
- Greater Mankato Area United Way
- Ark South West Housing
- Different Drummer Dance Club
- Statewide Health Improvement Program (SHIP)
- VINE Faith in Action
- Assisted Living Facilities
 - Vista Prairie at Monarch Meadows
 - Oak Terrace Senior Living of North Mankato
 - Ecumen Pathstone Living
 - Hillcrest Rehabilitation Center
 - Laurels Peak Rehabilitation Center
 - Cottagewood Senior Communities
 - Harry Meyering Center
 - Progressive Living
 - Meridian Senior Living
 - Willow Brook Senior Co-OP
 - Old Main Village
 - Home Instead Senior Care
- Area Apartment Complexes
 - Gus Johnson Plaza
 - Durham Apartments

Appendix 1-A.2: Stakeholder Meeting Summaries



MAPO ADA Transition Plan and Inventory Stakeholder Meeting #1 November 9, 2017 Intergovernmental Center – Mankato Room

Purpose:

The purpose of the MAPO ADA Transition Plan and Inventory Stakeholder Meeting was twofold. First, it provided individuals with disabilities, and organizations representing individuals with disabilities, information on the planning process. Second, it gave opportunity for the public to provide input on locations in the sidewalk and trails system that pose barriers to safe and efficient access.

Attendees:

Meeting #1 – November 9 th @ 1:00pm	
Name	Organization
Bob Platz	Life Works
Carol Clark	VINE Faith in Action
Vickie Apel	SMILES Center for Independent Learning
Mandy Hunecke	LEEP
Lacey Wegner	SMILES Center for Independent Learning
John Aaker	Citizen with Disabilities
Gretchen Bohl	Blue Earth County Public Health/SHIP
Emily Weins	MRCI WorkSource
Jerry	Citizen with Disabilities
Julie	Citizen with Disabilities
Mark Anderson	Transit - City of Mankato
Charles Androsky	Transportation Planner, MAPO
Paul Vogel	Executive Director, MAPO
Angie Bersaw	Senior Transportation Planner, Bolton & Menk, Inc.
John Shain	GIS Project Manager, Bolton & Menk, Inc.
Pete Lemke	Senior Project Manager, Bolton & Menk, Inc.
Matt Lassonde	Transportation Planner, Bolton & Menk, Inc.

Materials Presented:

The meeting was set up in an open house format giving attendees the opportunity to view materials and visit with project staff at their leisure. The following materials were made available at the meeting:

- Boards
 - ADA Transition Plan and Inventory Purpose and Need
 - Project Schedule
 - Code of Federal Regulations (28 CFR 35)
 - Pedestrian Ramp Elements
 - Compliant vs. Non-Compliant Ramps
 - Maps of Agency Infrastructure
- Sign-In Sheets
- Comment Forms

- Tablets for Entering Information Electronically
- Table Layouts of MAPO Area Aerial Photographs
- ADA Design and Construction Technical Guidance Documents

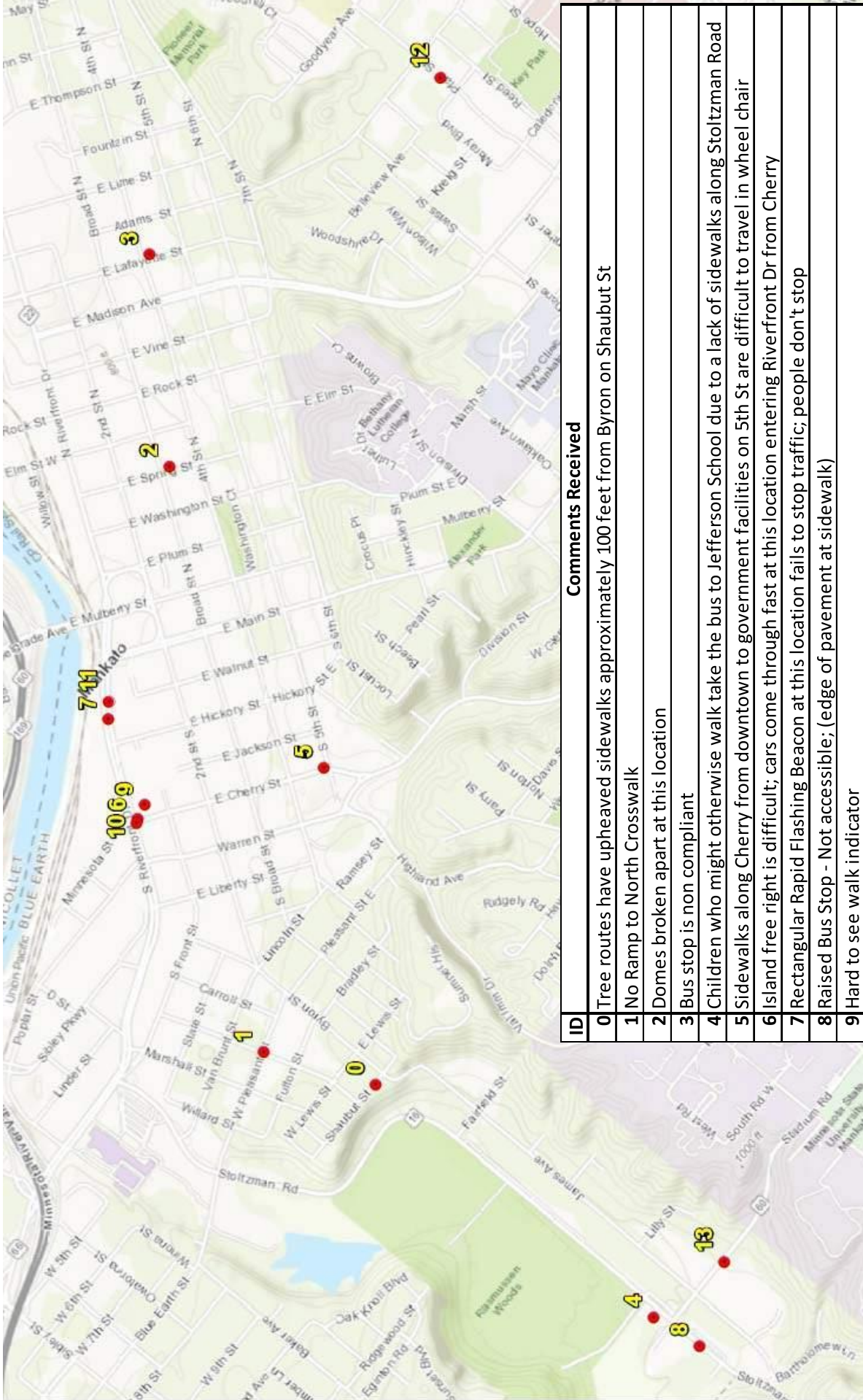
Comments Received:

Public input was collected throughout the duration of the meeting through discussions with staff. The following summarizes public comments collected:

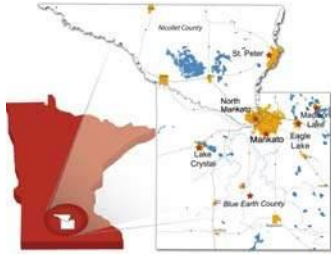
Sidewalks and Trails in General: Participants had the following concerns and comments addressing the sidewalk and trails systems.

- ***Signals:*** Several participants suggested that the duration of the pedestrian walk signal phase does not provide enough time for them to cross the road. One suggested that there are added challenges for her as she has not only physical disabilities, but also mental which slows her reaction time. By the time she has a chance to react and get her chair moving during the crossing cycle, time has already run out. Staff suggested, and participants agreed, a possible solution might be having two buttons for activating the pedestrian walk signal. One button would operate as it does today and provide the standard crossing time, and the second button would provide an extended length of time for the pedestrian phase. Another complaint was that signal pushbuttons are not accessible in many locations.
- ***Crosswalks:*** Participants mentioned that drivers stop vehicles within the crosswalks and do not provide space for pedestrians to cross. Consistency in driver training was brought up here. Comments also identified that drivers were not stopping for pedestrians in the crosswalk as required by state law.
- ***Snow Removal:*** The City and property owners clear snow from sidewalks but don't clear pedestrian ramps to access the walk. Also, snow gets trapped in truncated domes on ramps when they are cleared which causes slippery conditions for people walking. The domes don't allow for all snow to get cleared away.
- ***Gutters:*** One participant mentioned that the wheels on his chair get stuck on gutters prior to entering pedestrian ramps. The gutter profile provides a raised bump.

Location Based Comments: The map and table on the next page illustrates location specific comments received by participants at the meeting



ID	Comments Received
0	Tree routes have upheaved sidewalks approximately 100 feet from Byron on Shaubut St
1	No Ramp to North Crosswalk
2	Domes broken apart at this location
3	Bus stop is non compliant
4	Children who might otherwise walk take the bus to Jefferson School due to a lack of sidewalks along Stoltzman Road
5	Sidewalks along Cherry from downtown to government facilities on 5th St are difficult to travel in wheel chair
6	Island free right is difficult; cars come through fast at this location entering Riverfront Dr from Cherry
7	Rectangular Rapid Flashing Beacon at this location fails to stop traffic; people don't stop
8	Raised Bus Stop - Not accessible; (edge of pavement at sidewalk)
9	Hard to see walk indicator
10	Manhole in PAR
11	Sidewalk ends at this location
12	Curb Cut too narrow for chair to access
13	Laurels Edge Assisted Living - No Sidewalk on south side of Stadium Rd



MAPO ADA Transition Plan and Inventory SMILES Group Stakeholder Meetings December 20 and 21, 2017 @ 10:00 am



Meeting Summary

Purpose:

Project staff met with members from the SMILES Center for Independent Living (CIL) on December 20, 2017 at the Gus Johnson Plaza and on December 21, 2017 at the Durham Apartment building, both in Mankato, MN. These meetings were a follow to the MAPO ADA Transition Plan and Inventory Stakeholder Meeting held on November 9th in which members of the SMILE CIL group attended.

Project staff had an opportunity to sit in a SMILES regular meeting among members and solicit feedback on locations in the community that pose barriers to pedestrian infrastructure accessibility.

Attendees:

There were roughly 8 – 12 participants for each meeting. Below is a list of those who signed in.

Name	Organization
Lacey Wegner	SMILES Center for Independent Learning
David & Doris Bruender	Gus Johnson Plaza Residents
Margaret Caven	Gus Johnson Plaza Resident
Georganne Kramer	Gus Johnson Plaza Resident
Lois Tietz	Gus Johnson Plaza Resident
Carol McGinnis	Gus Johnson Plaza Resident
Todd Bode	Gus Johnson Plaza Resident
Connie Sheldon	Gus Johnson Plaza Resident
Ruth Krichne	Gus Johnson Plaza Resident
B.W. Bunkel	Gus Johnson Plaza Resident
Monica Stensby	Gus Johnson Plaza Resident
Susan Hahn	Gus Johnson Plaza Resident
Richard Reisdorf	Gus Johnson Plaza Resident
Julie	Durham Apartments
Matt Lassonde	Transportation Planner, Bolton & Menk, Inc.

Materials Presented:

Project staff led the discussion with project related information such as the purpose and scope and asked for feedback from participants.

Comments Received:

Input was collected from the group throughout the conversations. Location specific comments were entered into a mapping application for ease of integration into the Self-Evaluation process. Other comments are documented below:

General Comments:

Signals

- Buttons are often too high, out of the way and hard to reach, or don't work.
- Timing with APS is often too short.
- APS automated voice is often not loud enough to hear over traffic
- Crossing Second Street between Madison Street and Main Street is difficult as there are no lights to assist.

Sidewalks

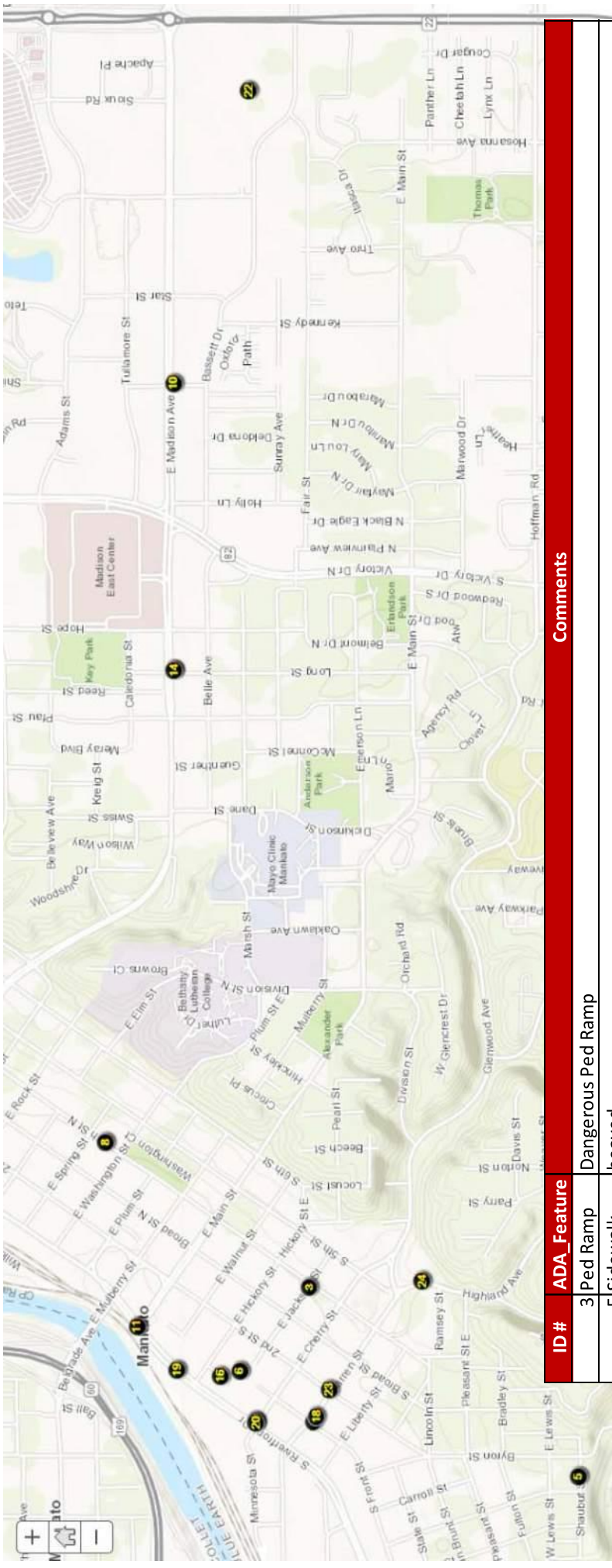
- Sidewalk patterns including cobblestone, pavers, and stamped concrete are a nuisance to those in wheelchairs. Patterns cause excessive vibration that is uncomfortable while riding and shakes personal items loose from chairs. Patterns also cause/contribute to wheel chair maintenance issues.
 - As a side note to this, those at the meetings suggested that it takes an enormous amount of time to get items they need to repair chairs or have them fixed.
- Sidewalks along Second Street are raised and uneven on both sides of the street. Have fallen twice just walking in the summertime. My husband has taken to the street in his wheel chair because it's easier to move along.

Pedestrian Ramps

- Some would like to see pedestrian ramps painted different colors so that they can see them from a distance to see where access is.

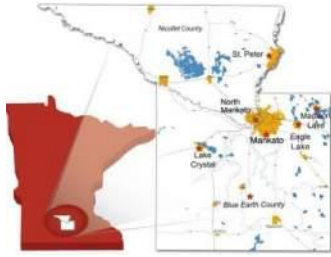
Bus Shelters

- Some would like to see more bus shelters



ID #	ADA Feature	Comments
3	Ped Ramp	Dangerous Ped Ramp
5	Sidewalk	heaved
6	Sidewalk	would like to see bus shelter for those waiting
8	Ped Ramp	Curb cuts and crosswalks from Gus Johnson crossing 4th St and crossing to Washington Park - Broken up, chunks of pavement out, etc.
10	Signal	Signal timing too short
11	Signal	Traffic light too short
12	Signal	Signal Timing too short
14	Other	Signal Timing Too Long
15	Ped Ramp	Not compliant
16	Other	Doors inside the Intergovernmental Center are not compliant
18	Sidewalk	Slanted sidewalk near Cakery
19	Signal	Flasher for Civic Center - No one stops - Resident of Gus Johnson Plaza hit at crossing
20	Signal	Signal timing and island non-compliant - Utility pole in middle of island
21	Crosswalk	People and cars conflict when crossing to Hyvee.
22	Bus Stop	Access to the bus stop is limited - No Pedestrian Ramp
23	Crosswalk	Cray Mansion Crossing is difficult
24	Crosswalk	Cherry Ridge Apartment Entrance difficult to cross in wheelchair. Ramps are tough to navigate

Appendix 1-A.3: Public Information Meeting Summaries



MAPO ADA Transition Plan and Inventory

Open House #1

January 31, 2018 6:00 to 8:00 pm



Meeting Summary

Purpose:

The Mankato/North Mankato Area Planning Organization (MAPO) and partner agencies, including the cities of Eagle Lake, Mankato, North Mankato, Skyline, as well as Nicollet and Blue Earth counties, held a public information meeting to provide information on efforts to complete an American with Disabilities Act (ADA) Transition Plan and Inventory.

Participants at the meeting had a chance to:

- Gain an understanding of ADA law requiring MAPO and partner agencies to complete an ADA Transition Plan and Inventory.
- Provide feedback to help project staff identify locations of barriers to accessibility that will become high priority for future projects.
- Receive information on avenues to stay informed and further contribute to the process.

Attendance:

Approximately 20 interested citizens and agency staff attended the open house.

Materials Presented:

The following materials were available for public review and comment:

- Table map layouts of each agency jurisdiction and relevant pedestrian infrastructure.
- Project information handout and contact list
- Presentation at 6:30 pm
- Information boards including:
 - Purpose and Need
 - Schedule
 - Pedestrian Ramp Elements
 - Code of Federal Regulations Law
 - Compliant vs. Non-Compliant Infrastructure
 - Agency Specific Infrastructure
- Comment Forms
- Sign-In Sheet

Comments Received:

Comments were received through written comments submitted and discussion with Agency staff. Location specific comments were also entered into a mapping application for ease of

integration into the Self-Evaluation process. Other comments are documented below:

Infrastructure Specific Comments:

Bus Shelters

- One requested a bus shelter at bank near Buffalo Wild Wings.

Crosswalks

- One participant suggested that crosswalks have no detectable warnings on the sides of the walk; her visually impaired children tend to veer off the path and into traffic because they don't know the constraints of the crossing.
- Second Street and Broad Street; Crosswalks difficult to navigate; Traffic Speeds are high

General Comments:

- One participant made the following statements:
 - How do we promote being good community members and what is it neighbors/neighborhoods can do to help with pedestrian transportation? Not everything can be funded by the local government.
 - Can neighborhood associations be more focused on identifying/reporting problem areas?
 - Failure to clear sidewalks is not all out of intentional neglect; some people have all they can do just to remain in their homes; what affordable resources exist to help people? The VINE often has a "full list" and cannot accept more people.
- Several participants would like to see more enforcement on snow removal on sidewalks and ramps. MAPO staff ensured the group that efforts are ramping up on enforcement, at least in Mankato. Project staff suggested they would be reviewing snow removal policies as part of the project.
- Build a trail in front of the bus garage on Victory Drive, south of Hoffman Road.
- Few people yield to pedestrians in crosswalks. Pedestrians are well accommodated on MSU campus so why not in the rest of the City. They suggested more education/reminders regarding crosswalk right of way, and even enforcement.
- The driveway in front of City Hall better accommodated people with disabilities. Difficult to get to front entrance now.
- The berm on the north side of Sibley Park is too steep for people with disabilities to get to the park.
- No Handrail at the Civic Center – people with sight, back, knee and balance problems can't attend events.
- There is no transportation to events at night or weekends when MSU is not in session.
- No access to Urgent Care when needed; Vine, Handicap bus, and others need 24 hour advance notice. Some have issues needing only see a doctor, not the

emergency room. Cabs cost \$20.00 both there and back; trip to pharmacy costs \$10.00 (without waiting). This trip is from Sibley Parkway Apartments to Wickersham Health Campus.

- No access to New Ulm Medical Clinic (Alina) – AMV won't transport people with disabilities to and from the clinic. This is the closest clinic with a specialist for arthritis. VINE only operates at certain days and times and buses are not accessible for all disability issues.
- Lack of Handicap parking throughout downtown; people who can walk only limited amount of time have no easy access.
- No handicap bus service for people after bar closing.
- No handicap taxi service.
- No accessibility for people at City Council Meeting. Curb cut at City Hall.
- Consider revising median on Victory Drive at Marwood Drive.



MAPO ADA Transition Plan and Inventory

Open House #2

March 6, 2018 3:00 to 6:00 pm



Meeting Summary

Purpose:

The Mankato/North Mankato Area Planning Organization (MAPO) and partner agencies, including the cities of Eagle Lake, Mankato, North Mankato, Skyline, as well as Nicollet and Blue Earth counties, held the second public information meeting to provide information on efforts to complete an American with Disabilities Act (ADA) Transition Plan and Inventory.

Participants at the meeting had a chance to:

- Gain an understanding of ADA law requiring MAPO and partner agencies to complete an ADA Transition Plan and Inventory.
- Provide input on deficiencies identified in the field inventory.
- Provide input on the draft ADA Transition Plans for each MAPO partner agency.
- Learn about next steps including plan approval by MAPO and adoption by partner agencies.

Attendance:

Approximately 21 interested citizens and agency staff attended the open house.

Materials Presented:

The following materials were available for public review and comment:

- Draft ADA Transition Plans for each MAPO Partner Agency
- Table map layouts of each MAPO partner agency's facilities with compliance rating.
- Project information handout
- Presentation
- Information boards including:
 - Purpose and Need
 - Pedestrian Ramp Elements
 - Code of Federal Regulations Law
 - Compliant vs. Non-Compliant Infrastructure
- Comment Forms
- Sign-In Sheets

Comments Received:

Comments were received from participants through written comments submitted and discussion with Agency staff. Location specific comments were also entered into a mapping application for ease of integration into the Self-Evaluation process. Other comments are documented below:

1. Infrastructure Specific Comments:

a. Pedestrian Ramps

- i. One participant mentioned that the intersection of Riverfront Drive and 3rd Avenue had one corner reconstructed while across the street remains non-compliant. They thought all corners of an intersection should be reconstructed when any of an intersections corners are reconstructed. MAPO Staff recommended this become a policy recommendation for partner agencies. Project staff has included in draft ADA Transition Plans

b. Crosswalks

- i. One suggested the crossing at the post office on 2nd Street and Jackson Street has been slippery this winter. The faux brick pattern should be textured.
- ii. One mentioned the crossing at Liberty Street and 2nd Street is challenging for those with mobility issues.

c. Sidewalk

- i. One mentioned the sidewalk in front of Joseph's Liquor is badly heaved. Staff has confirmed a panel is heaved at this location and has added as a barrier to accessibility. 4th Street is a short-term priority for the City of Mankato.

d. Traffic Lights

- i. Safety Island @ Cherry Street and Riverfront Drive is challenging for those with mobility issues.
- ii. Some requested replacing the pedestrian flasher at the Riverfront Drive crossing to the Verizon Center with a flashing red light. Many have suggested this is a dangerous crossing scenario and drivers consistently don't stop in all four lanes for pedestrians crossing. Flashing beacon is not effective.

e. All Pedestrian Facilities

- i. A resident confined to a wheel chair requested that Lookout Drive near Cliff Court and Marie Lane become a higher priority for North Mankato. She has difficulty walking her dog on deficient infrastructure surrounding that area. Project staff said they would work with North Mankato to identify that infrastructure for short-term implementation.

f. Policy

- i. One participant requested that MAPO partner agencies work with owners of properties containing apartment buildings or other high pedestrian traffic locations to ensure they are improving access to their buildings where necessary when adjacent facilities in the public right-of-way are being improved. Project staff has included this in policy recommendations for MAPO partner agency plans.

2. Other General Comments:

- a. A participant suggested installing automatic door openers in the Mankato

Intergovernmental Center for wheelchair accessibility near the City Council Chambers.

- b. A participant mentioned that the men's bathroom in the Verizon Center addition isn't accessible for larger power wheel chairs.
- c. One participant suggested that project implementation be coordinated with Safe Routes to School Plans. Staff will consider this during final implementation plan development.
- d. SMILES CIL representatives mentioned the Durham Apartments and the Gus Johnson Plaza need to be high priority as residents have mobility challenges.

Appendix 1-B: Self-Evaluation – Commonly Identified Deficiencies and Obstructions

I. Appendix 1-B: Self-Evaluation – Commonly Identified Deficiencies and Obstructions

Figure 1-B.1 – Commonly Identified Deficiencies



Vertical Discontinuity



Horizontal Discontinuity



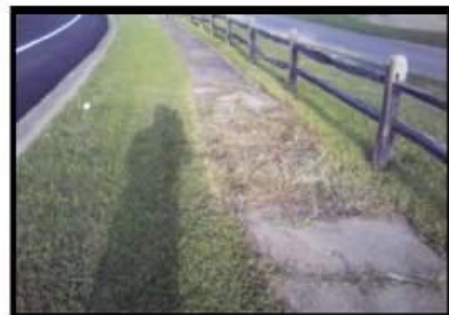
Cross Slope



Cracking



Ponding



Vegetation



Spalling



Vertical Slope

Figure 1-B.2 – Sidewalk Obstruction Examples



Fire Hydrant



Lighting Pole



Traffic Signal Handhole



Traffic Signal Pole



Utility Pole



Water Gate Valve

MAPO ADA TRANSITION PLAN AND INVENTORY

PART 4 – CITY OF NORTH MANKATO ADA TRANSITION PLAN AND INVENTORY

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Appendix

Appendix 4-A: Self-Evaluation – Program Review

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

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

Appendix 4-D: Public Outreach Results

Appendix 4-E: Greivance Procedure

Appendix 4-F: Contact Information

Appendix 4-G: ADA Design Standards and Procedures

I. INTRODUCTION

A. City of North Mankato

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.” Part 1 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.

II. PUBLIC OUTREACH

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

- 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 4-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 two public information meetings that took place on January 31, 2018 and March 6, 2019. See **Appendix 1-A** for summaries of those meetings.
- City Website: This document was available for public comment online between the dates of February 6, 2019 to March 20, 2019. A summary of comments received and detailed information regarding the public outreach activities are located in **Appendix 4-D**.

III. SELF-EVALUATION RESULTS

A. Review of Programs

The review of programs for the City of North Mankato’s Self-Evaluation began in September 2017 and was completed in June 2018. During that time project staff inventoried 65 miles of sidewalk/trail, 1000 locations where pedestrian ramps exist

or should exist, 465 crosswalks, 15 bus stops, and 46 traffic signal push button locations for barriers to accessibility. **Table 4-1** summarizes the results of the Self-Evaluation infrastructure data collection completed within the City of North Mankato public rights-of-way.

A full report of the results of the Self-Evaluation assessing infrastructure compliance can be seen in **Appendix 4-A**.

Table 4-1. City of North Mankato Self-Evaluation Infrastructure Data Collection Results		
Infrastructure Type	% Compliant	Summary
Pedestrian Ramps	33%	<ul style="list-style-type: none"> • 1000 total pedestrian ramps • 334 (33%) are compliant • 666 (67%) are non-compliant
Sidewalks	76%	<ul style="list-style-type: none"> • 65 total miles of sidewalk/trail • 370 accessibility barriers were identified • 49 miles of sidewalk/trail (76%) are compliant • 15 miles of sidewalk/trail (24%) are non-compliant
Bus Stops	27%	<ul style="list-style-type: none"> • 14 total Bus Stops • 4 are compliant (27%) • 11 are non-compliant (73%)
Traffic Signal Push Buttons with APS	35%	<ul style="list-style-type: none"> • 46 total Traffic Signal Push Button Locations • 30 are not Accessible Pedestrian Signals (APS) (65%)
Crosswalks	99%	<ul style="list-style-type: none"> • 465 crossings have marked crosswalks • 99% of crossings are compliant • 1% of crossings are non-compliant

B. Review of Policies and Practices

1. 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.

2. 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

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. A brief engineering study will be performed where 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.

A full ADA compliance assessment of policies and practices is included in **Appendix 4-B**.

IV. IMPLEMENTATION PLAN

A. 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 2017-2018 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.

B. 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.

C. Schedule and Budget

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 and 5-year Capital Improvements Plan, and its long-term maintenance effort.

V. 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**.

VI. 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**.

VII. 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 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 4-A: Self-Evaluation – Program Review

I. Appendix 4-A: City of North Mankato, MN Self-Evaluation – Program Review

A. Review of Programs

The City of North Mankato inventoried pedestrian ramps and sidewalks within the public rights-of-way beginning in November of 2017 and ending in July 2018. The following provides the results of that inventory:

1. Pedestrian Ramps

The City of North Mankato has 1000 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. 333 (33%) of the locations were reported to be compliant and 667 (67%) were reported to be non-compliant.

2. 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 65 miles of sidewalk evaluated, 15 miles had a condition rating of three or four meaning they exhibited instances of non-compliance along their length and require further evaluation and remedial action. 366 accessibility barriers, or obstructions, were also present along sidewalks and trails.

3. Crosswalks

Crosswalks were inventoried and evaluated for the quality of markings. Nine crosswalks were identified as non-compliant due to markings that were faded or partially removed.

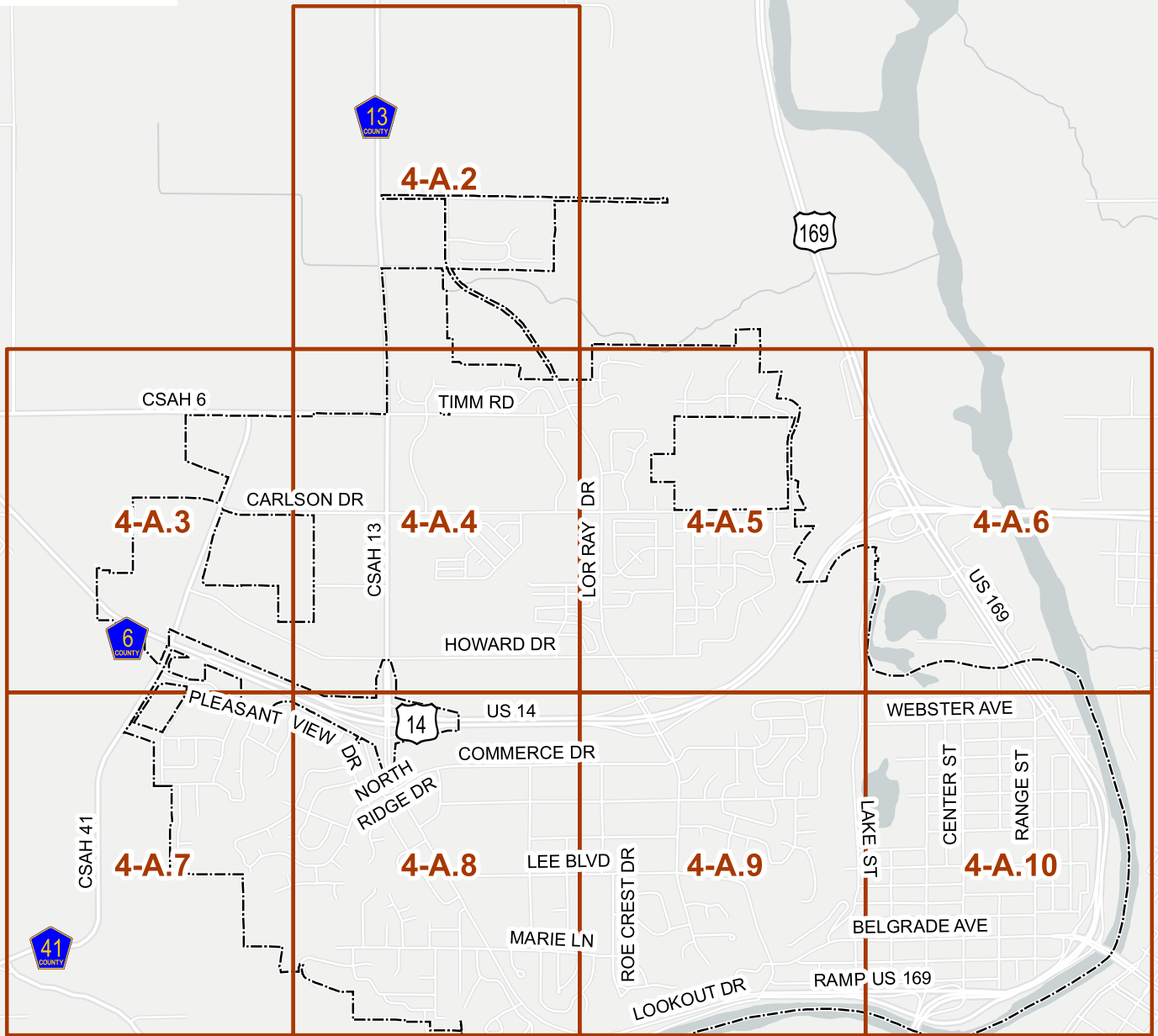
4. Traffic Signals

46 traffic signals were evaluated for the presence of Accessible Pedestrian Signal (APS) technology. Each pedestrian crossing push button location was inventoried as a separate location and identified as non-compliant if APS technology was not present. Of 30 locations were without APS technology.

5. Bus Stops

Bus stops were evaluated for connection to PAR and sufficient landing and loading areas. If a stop is not able to be accessed by an accessible pedestrian access route, or if a grass boulevard or similar facility poses a barrier for those with disabilities to access transportation, the stop was identified as non-compliant. 11 were identified as non-compliant.

Compliant and non-compliant pedestrian infrastructure is illustrated in **Figures 4-A.1** through **4-A.10**. 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**).

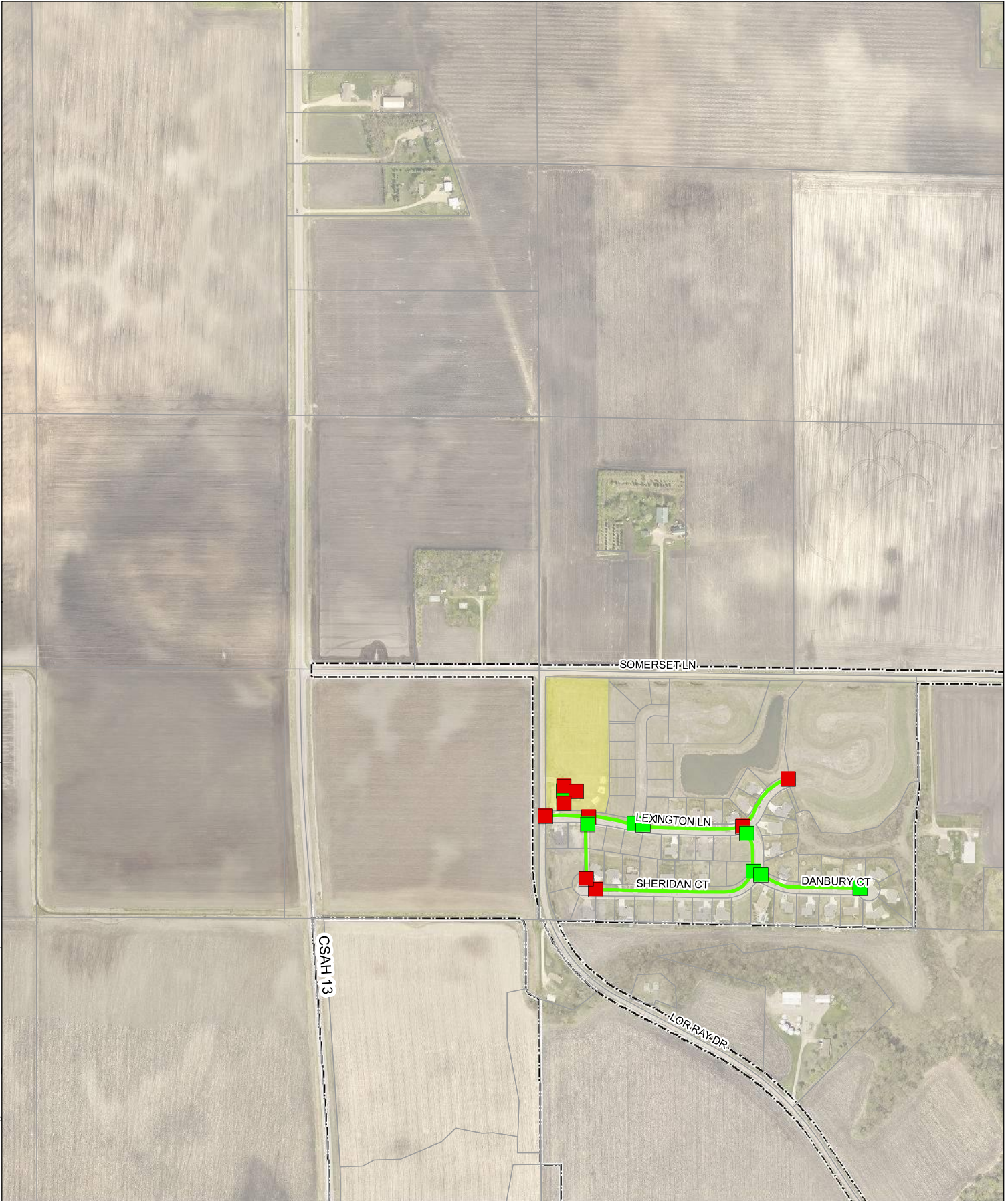


Legend

- | | |
|-------------------------------|-------------------------|
| Pedestrian Ramp Not Compliant | Non-Compliant Signal |
| Pedestrian Ramp Compliant | Non-Compliant Crosswalk |
| Sidewalk Not Compliant | Sidewalk Barrier |
| Sidewalk Compliant | Priority 1 Area |
| Non-Compliant Bus Stop | Priority 2 Area |
| | City Limits |

0 0.25
Miles
Source: Nicollet County

Figure 4-A.1

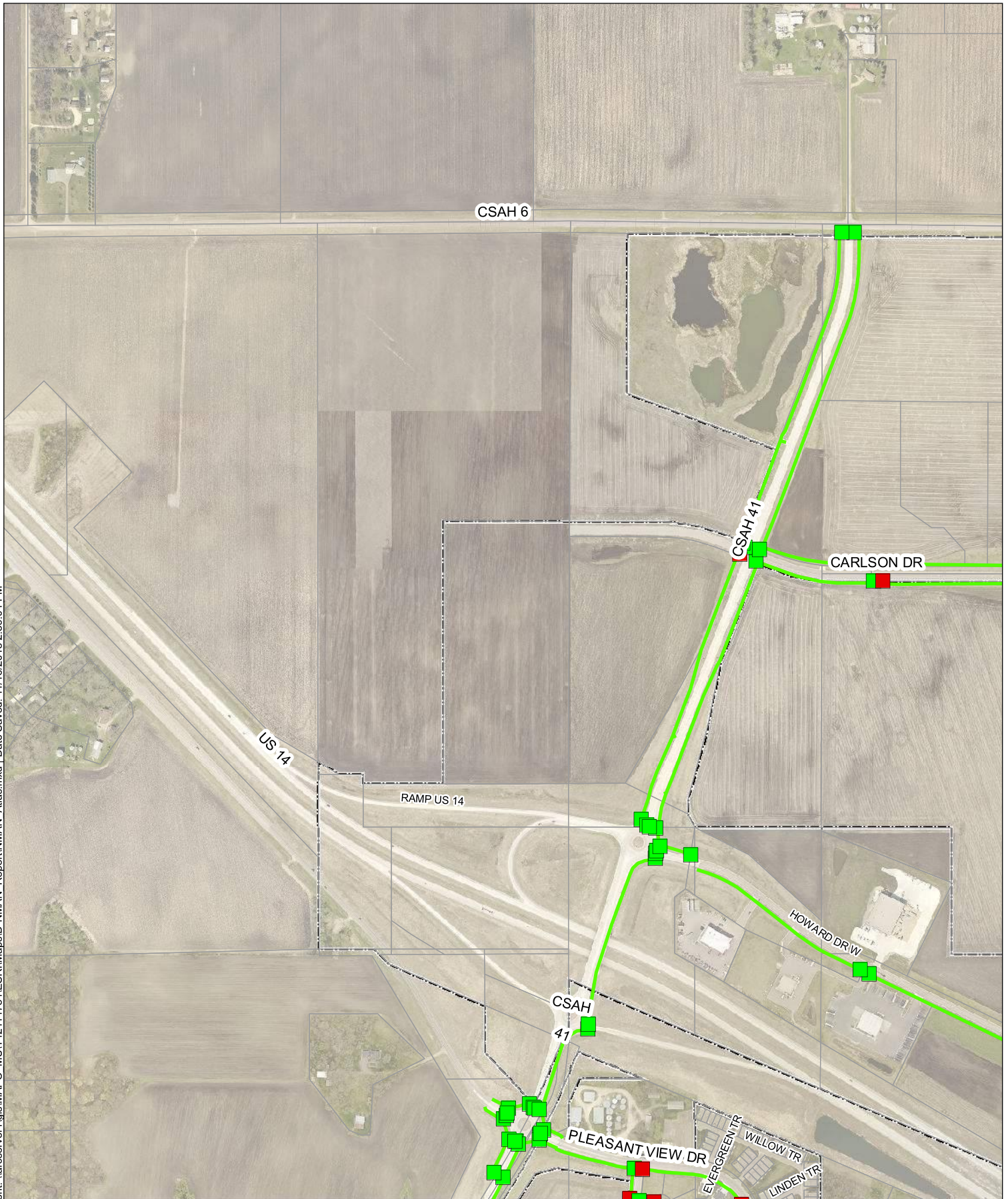


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- Figure 4-A.2 -



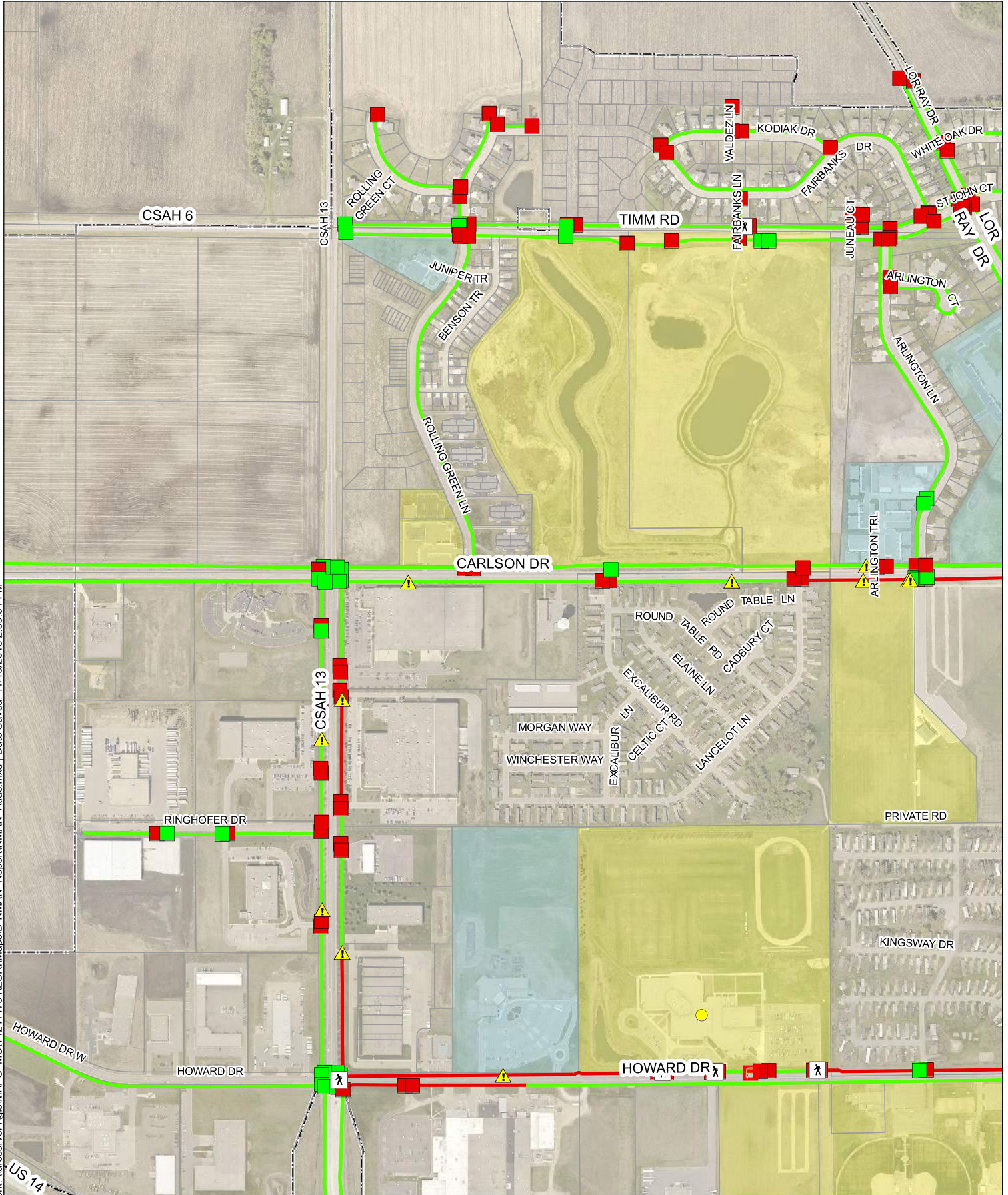


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- Figure 4-A.3 -





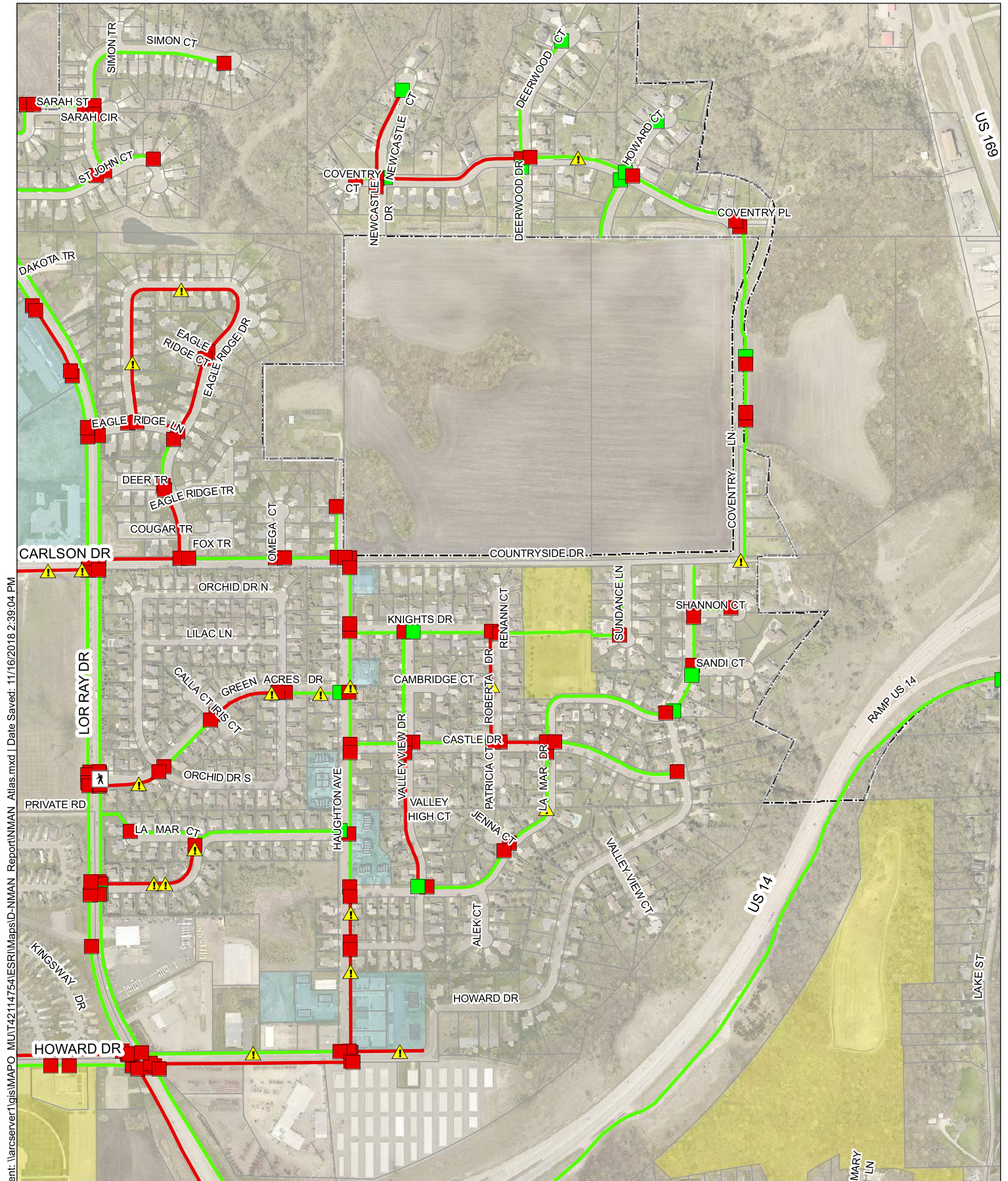
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- Figure 4-A.4 -

0 500 Feet
Source: Nicollet County





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- Figure 4-A.5 -

0 500 Feet
Source: Nicollet County





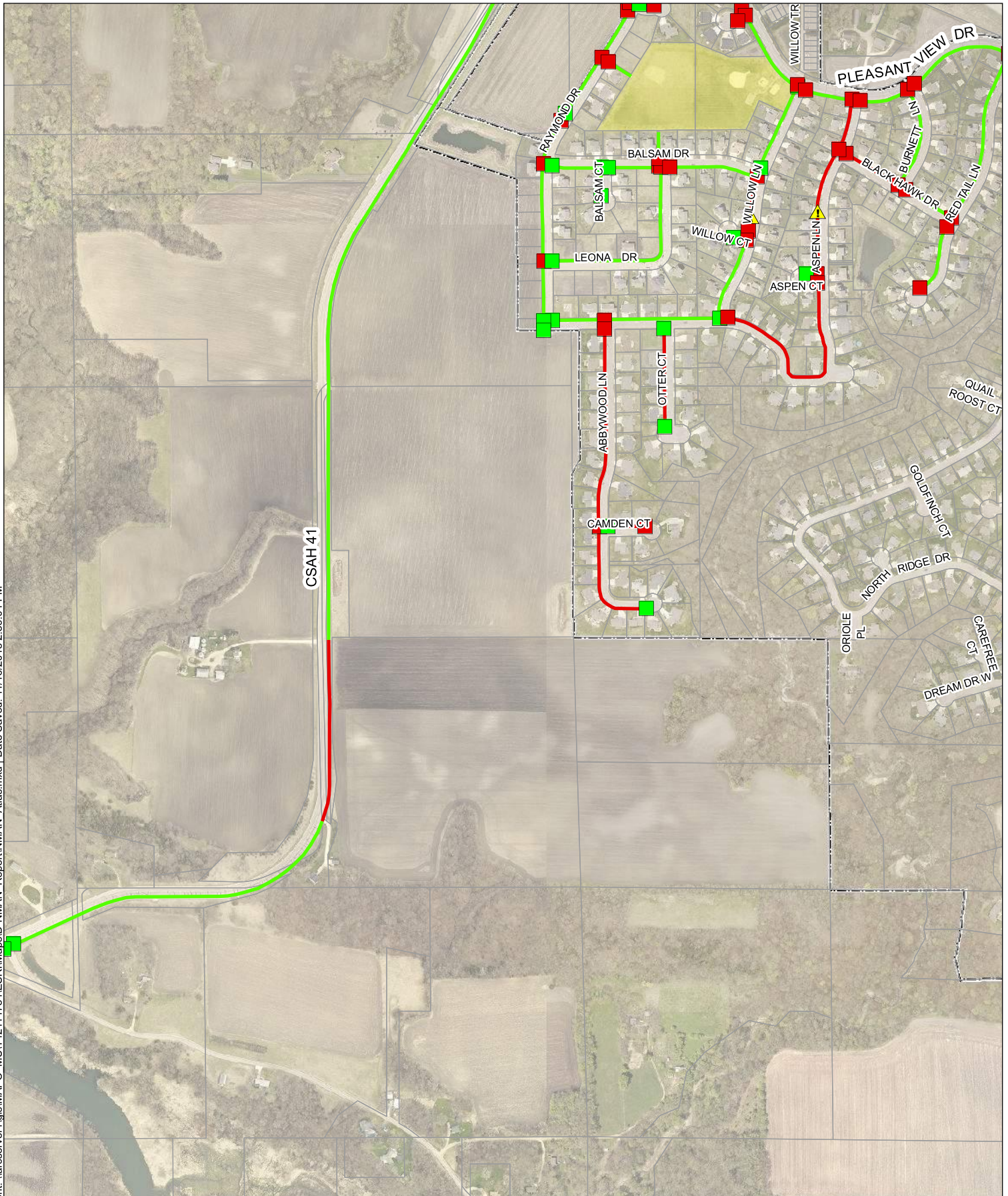
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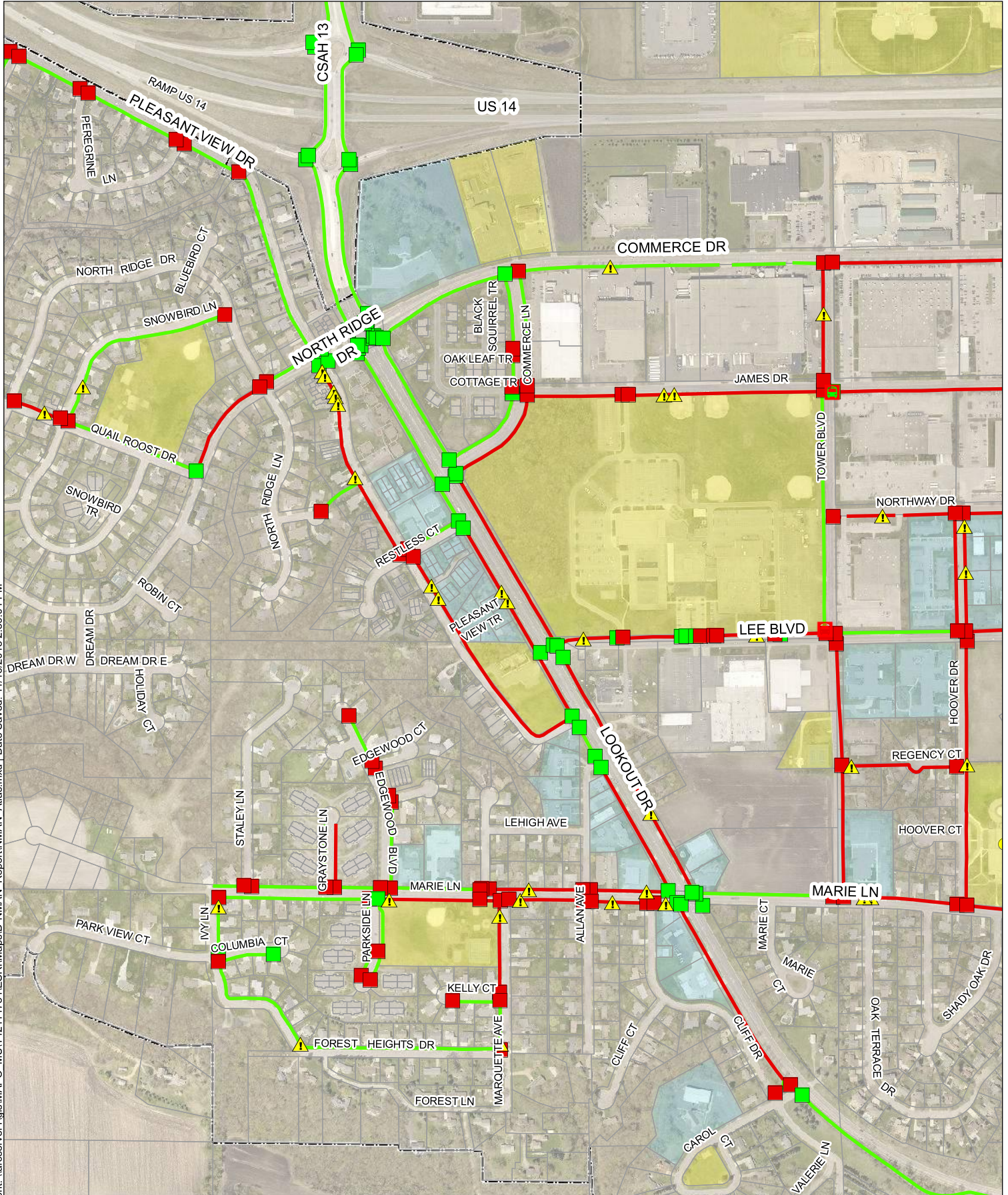


- Figure 4-A.6 -

0 500 Feet
Source: Nicollet County







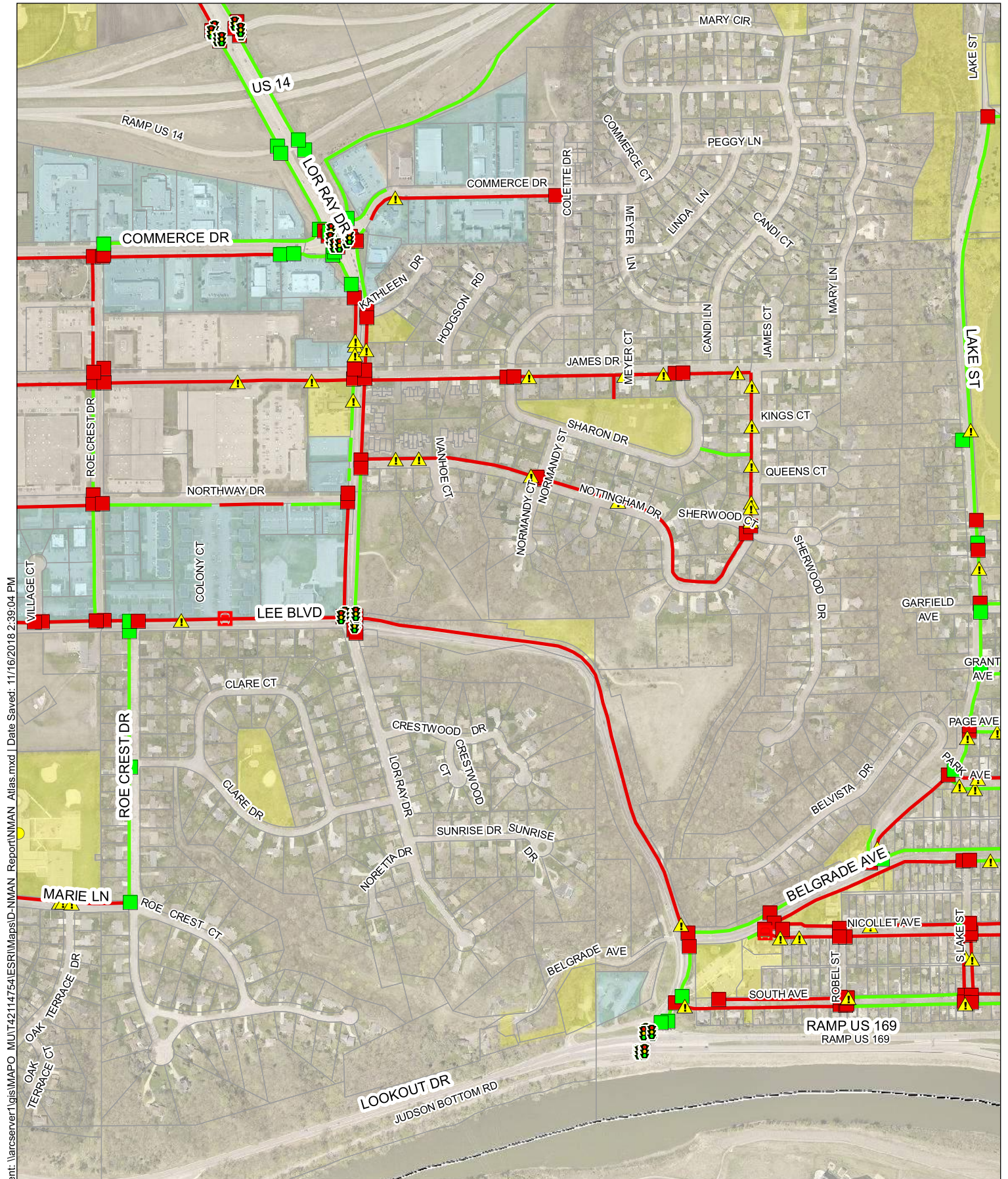
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- Figure 4-A.8 -

0 500 Feet
Source: Nicollet County





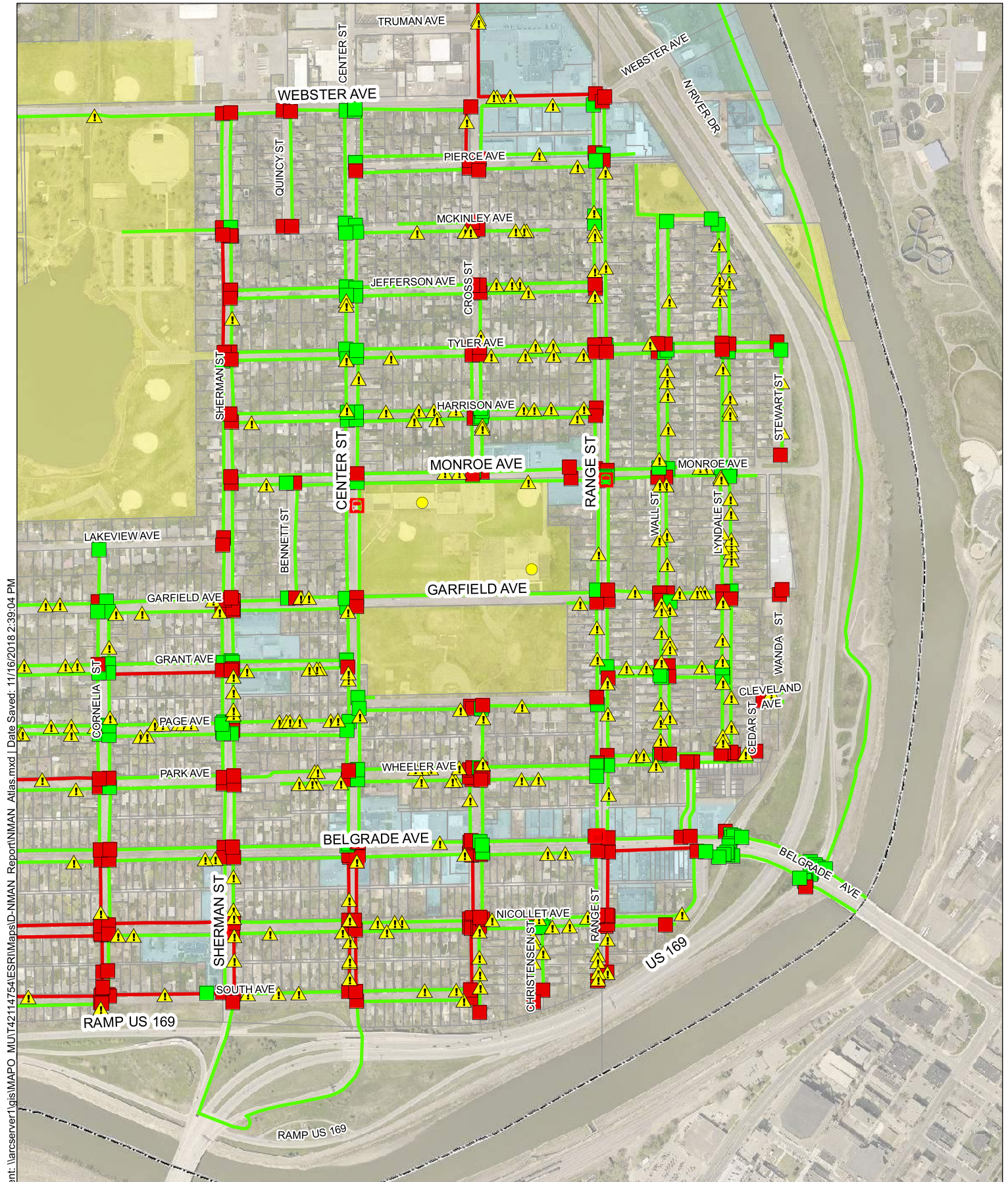
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- Figure 4-A.9 -

0 500 Feet
Source: Nicollet County





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Table 4-A.2. City of North Mankato Program Review - Implementation Plan

Location	Land Use	Length (ft) Non-Compliant Sidewalk	# Non-Compliant Pedestrian Ramps	# Non-Compliant Bus Stops	# Non-Compliant Traffic Signals*	Length (ft) Sidewalk/Trail Barriers	Priority Level	Tied to Planned Project (Y/N)	Planned Project Year	Term
COMMERCE DR	Housing Complexes; Apartments; Shopping	3269	5	0	0	15	1	Y	2019	(P) Short-Term
HOWARD DR	Church; Housing Complexes; Schools; Government Facilities; Parks;	5479	29	0	0	15	1	Y	2020	(P) Short-Term
GARFIELD AVE	Schools	0	0	0	0	45	1	Y	2021	(P) Short-Term
MONROE AVE	Church; Schools;	0	3	0	0	60	1	Y	2021	(P) Short-Term
RANGE ST	Church; Housing Complexes; Schools; Shopping	583	14	2	0	175	1	Y	2021	(P) Short-Term
CENTER ST	Schools; Shopping	1298	7	1	0	145	1	Y	2021	(P) Short-Term
**Programmed (P) Short-Term (2019-2021) Totals										
Lookout Dr	Housing Complexes; Schools; Shopping	10629	58	3	0	455	-	-	-	(P) Short-Term
MARIE LN	Church; Housing Complexes; Parks; Schools; Shopping	1216	19	0	8	10	1	N	N/A	Short-Term
PARK AVE	Schools	3569	20	0	0	0	1	N	N/A	Short-Term
LYNDALE ST	Parks; Schools	692	8	0	0	35	1	N	N/A	Short-Term
STEWART ST	Schools	0	0	0	0	330	1	N	N/A	Short-Term
HARRISON AVE	Schools	0	1	0	0	20	1	N	N/A	Short-Term
PAGE AVE	Housing Complexes; Schools	0	6	0	0	130	1	N	N/A	Short-Term
KING ARTHUR PARK	Parks	123	0	0	0	250	1	N	N/A	Short-Term
CLEVELAND AVE	Schools	0	1	0	0	0	1	N	N/A	Short-Term
CARLSON DR	Housing Complexes; Parks; Schools	1377	7	0	0	10	1	N	N/A	Short-Term
REGENCY CT	Housing Complexes; Schools	623	0	0	0	0	1	N	N/A	Short-Term
LAKE ST	Parks; Schools	611	6	0	0	75	1	N	N/A	Short-Term
RESERVE PARK	Parks	0	2	0	0	0	1	N	N/A	Short-Term
GRANT AVE	Church; Schools;	603	1	0	0	70	1	N	N/A	Short-Term
MCKINLEY AVE	Schools	0	5	0	0	75	1	N	N/A	Short-Term
MARQUETTE AVE	Parks; Schools;	485	3	0	0	30	1	N	N/A	Short-Term
SNOWBIRD LN	Parks	0	3	0	0	5	1	N	N/A	Short-Term
BALSAM DR & LEONA DR	Parks	0	4	0	0	0	1	N	N/A	Short-Term
LEXINGTON LN	Parks	0	3	0	0	0	1	N	N/A	Short-Term
RAYMOND DR	Parks	0	3	0	0	0	1	N	N/A	Short-Term
FAIRBANKS LN & TIMM RD	Parks	0	4	0	0	0	1	N	N/A	Short-Term
PARKSIDE LN	Housing Complexes; Parks	0	3	0	0	0	1	N	N/A	Short-Term
HOOPER DR	Housing Complexes; Schools;	2620	8	0	0	0	1	N	N/A	Short-Term
NORTHWAY DR	Housing Complexes; Schools	1506	4	0	0	0	1	N	N/A	Short-Term
TYLER AVE	Parks; Schools;	0	15	0	0	70	1	N	N/A	Short-Term
NICOLLET AVE	Church; Government Facilities; Housing Complexes; Schools; Shopping	3902	45	2	0	110	1	N	N/A	Short-Term
GARFIELD AVE	Housing Complexes; Schools; Parks; Schools;	0	21	0	0	125	1	N	N/A	Short-Term
Short-Term (2019-2028) Totals										
LOR RAY DR	Church; Health Clinics; Hospitals; Housing Complexes; Schools; Shopping;	17327	192	2	8	1355	-	-	-	Short-Term
TOWER BLVD	Church; Housing Complexes; Schools	2535	47	0	21	10	1	N	N/A	Mid-Term
WHEELER AVE	Housing Complexes; Schools;	1945	8	1	0	0	1	N	N/A	Mid-Term
BENSON TRAIL	Health Clinics; Hospitals; Housing Complexes; Church; Parks; Schools	0	16	0	0	150	1	N	N/A	Mid-Term
WALL ST	Housing Complexes; Schools; Shopping;	0	19	0	0	5	1	N	N/A	Mid-Term
JAMES DR	Health Clinics; Hospitals; Housing Complexes; Schools	6080	19	1	0	245	1	N	N/A	Mid-Term
BELGRADE AVE	Church; Government Facilities; Housing Complexes; Schools; Shopping	1528	30	2	0	55	1	N	N/A	Mid-Term
COMMERCE LN	Housing Complexes; Schools	587	3	0	0	0	1	N	N/A	Mid-Term
LOOKOUT DR	Health Clinics; Hospitals; Housing Complexes; Schools; Shopping	5598	0	0	0	0	1	N	N/A	Mid-Term
CROSS ST	Church; Schools; Shopping	1945	17	0	0	95	1	N	N/A	Mid-Term
LOR RAY TRAIL	Church; Housing Complexes; Schools; Public Housing and Homeless Shelters	370	19	0	0	1	1	N	N/A	Mid-Term
Mid-Term (2029-2038) Totals										
SOUTH AVE	Government Facilities; Government Facilities; Housing Complexes; Parks	20588	195	4	21	560	-	-	-	Mid-Term
SHERMAN ST	Church; Parks; Schools; Church; Schools; Housing Complexes; Schools	2763	18	0	0	50	1	N	N/A	Long-Term
LEE BLVD	Church; Housing Complexes; Parks; Public Schools	5958	19	0	0	110	1	N	N/A	Long-Term
PLEASANT VIEW DR	Health Clinics; Hospitals; Housing Complexes; Parks	2456	16	1	0	0	1	N	N/A	Long-Term
PIERCE AVE	Shopping	0	0	0	0	25	2	N	N/A	Long-Term
WEBSTER AVE	Shopping	621	2	0	0	15	2	N	N/A	Long-Term
HAUGHTON AVE	Housing Complexes;	809	15	0	0	15	2	N	N/A	Long-Term
GRAYSTONE LN	Housing Complexes;	334	0	0	0	0	2	N	N/A	Long-Term

Table 4-A.2. City of North Mankato Program Review - Implementation Plan

Location	Land Use	Length (ft) Non-Compliant Sidewalk	# Non-Compliant Pedestrian Ramps	# Non-Compliant Bus Stops	# Non-Compliant Traffic Signals*	Length (ft) Sidewalk/Trail Barriers	Priority Level	Tied to Planned Project (Y/N)	Planned Project Year	Term
LA MAR DR	Housing Complexes;	633	4	0	0	20	2	N	N/A	Long-Term
PLEASANT VIEW CT	Housing Complexes;	0	1	0	0	0	2	N	N/A	Long-Term
EDGEWOOD BLVD & EDGEWOOD CT	Housing Complexes;	0	2	0	0	0	2	N	N/A	Long-Term
EDGEWOOD BLVD & MEADOWBROOK CT	Housing Complexes;	0	2	0	0	0	2	N	N/A	Long-Term
WHITE OAK DR	Housing Complexes;	0	2	0	0	0	2	N	N/A	Long-Term
NOTTINGHAM DR	Housing Complexes;	3266	4	0	0	0	2	N	N/A	Long-Term
ROE CREST DR	Other (Low Priority Use)	556	0	0	0	0	2	N	N/A	Long-Term
FAIRBANKS DR & TIMM RD	Schools	0	3	0	0	0	3	N	N/A	Mid-Term
FOREST HEIGHTS DR	Schools	0	1	0	0	15	3	N	N/A	Long-Term
ARLINGTON LN & TIMM RD	Schools	0	1	0	0	0	3	N	N/A	Long-Term
KELLY CT	Schools	0	1	0	0	0	3	N	N/A	Long-Term
SIMON CT & ST JOHN CT	Schools	0	2	0	0	0	3	N	N/A	Long-Term
ARLINGTON CT & ARLINGTON LN	Schools	0	2	0	0	0	3	N	N/A	Long-Term
ST JOHN CT	Schools	0	1	0	0	0	3	N	N/A	Long-Term
COUNTRYSIDE DR	Schools	427	4	0	0	0	3	N	N/A	Long-Term
GREEN ACRES DR	Schools	698	6	0	0	15	3	N	N/A	Long-Term
EAGLE RIDGE LN	Schools	229	4	0	0	0	3	N	N/A	Long-Term
CORNELIA ST	Schools	656	2	0	0	5	3	N	N/A	Long-Term
JUNEAU CT & TIMM RD	Schools	0	2	0	0	0	3	N	N/A	Long-Term
CAROL CT & CLIFF DR & LOOKOUT TRAIL	Schools	0	1	0	0	0	3	N	N/A	Long-Term
EAGLE RIDGE DR	Schools	2406	4	0	0	0	3	N	N/A	Long-Term
IVY LN	Other (Low Priority Use)	0	0	0	0	15	3	N	N/A	Long-Term
NEWCASTLE DR	Other (Low Priority Use)	250	0	0	0	0	3	N	N/A	Long-Term
ROBERTA DR	Other (Low Priority Use)	585	4	0	0	0	3	N	N/A	Long-Term
S LAKE ST	Other (Low Priority Use)	635	0	0	0	0	3	N	N/A	Long-Term
OTTER CT	Other (Low Priority Use)	512	0	0	0	0	3	N	N/A	Long-Term
COVENTRY LN	Other (Low Priority Use)	0	1	0	0	0	3	N	N/A	Long-Term
COVENTRY LN	Other (Low Priority Use)	754	9	0	0	20	3	N	N/A	Long-Term
CHRISTENSEN ST	Other (Low Priority Use)	0	2	0	0	30	3	N	N/A	Long-Term
Co Rd 41	Other (Low Priority Use)	957	0	0	0	0	3	N	N/A	Long-Term
CASTLE DR	Other (Low Priority Use)	0	6	0	0	0	3	N	N/A	Long-Term
QUAIL ROOST DR	Other (Low Priority Use)	245	1	0	0	0	3	N	N/A	Long-Term
NEWCASTLE CT	Other (Low Priority Use)	497	0	0	0	0	3	N	N/A	Long-Term
WILLOW LN	Other (Low Priority Use)	283	3	0	0	0	3	N	N/A	Long-Term
ABBYYWOOD LN	Other (Low Priority Use)	1672	1	0	0	0	3	N	N/A	Long-Term
CAMDEN CT	Other (Low Priority Use)	198	1	0	0	0	3	N	N/A	Long-Term
ROLLING GREEN LN & TIMM RD	Other (Low Priority Use)	0	1	0	0	0	3	N	N/A	Long-Term
NORTH RIDGE DR	Other (Low Priority Use)	566	2	0	0	0	3	N	N/A	Long-Term
VALLEY VIEW DR	Other (Low Priority Use)	727	1	0	0	0	3	N	N/A	Long-Term
SHERIDAN CT	Other (Low Priority Use)	0	2	0	0	0	3	N	N/A	Long-Term
LEONA DR & RAYMOND DR	Other (Low Priority Use)	0	1	0	0	0	3	N	N/A	Long-Term
BLACK HAWK DR	Other (Low Priority Use)	318	4	0	0	0	3	N	N/A	Long-Term
SARAH CIR & SARAH ST & SIMON CT	Other (Low Priority Use)	0	3	0	0	0	3	N	N/A	Long-Term
FAIRBANKS DR & FAIRBANKS LN	Other (Low Priority Use)	0	1	0	0	0	3	N	N/A	Long-Term
TIMM RD	Other (Low Priority Use)	0	2	0	0	0	3	N	N/A	Long-Term
CARDINAL CT	Other (Low Priority Use)	0	1	0	0	0	3	N	N/A	Long-Term
VALDEZ LN	Other (Low Priority Use)	0	1	0	0	0	3	N	N/A	Long-Term
SHANNON CT	Other (Low Priority Use)	0	1	0	0	0	3	N	N/A	Long-Term
RAYMOND CT	Other (Low Priority Use)	0	1	0	0	0	3	N	N/A	Long-Term
FAIRBANKS DR & KODIAK DR	Other (Low Priority Use)	0	3	0	0	0	3	N	N/A	Long-Term
FAIRBANKS DR	Other (Low Priority Use)	0	1	0	0	0	3	N	N/A	Long-Term
RAMP US 14	Other (Low Priority Use)	0	1	0	0	0	3	N	N/A	Long-Term
JUNEAU CT	Other (Low Priority Use)	0	2	0	0	0	3	N	N/A	Long-Term
RAYMOND CT & RAYMOND DR	Other (Low Priority Use)	0	2	0	0	0	3	N	N/A	Long-Term
EDGEWOOD BLVD	Other (Low Priority Use)	0	1	0	0	0	3	N	N/A	Long-Term

Table 4-A.2. City of North Mankato Program Review - Implementation Plan

Location	Land Use	Length (ft) Non-Compliant Sidewalk	# Non-Compliant Pedestrian Ramps	# Non-Compliant Bus Stops	# Non-Compliant Traffic Signals*	Length (ft) Sidewalk/Trail Barriers	Priority Level	Tied to Planned Project (Y/N)	Planned Project Year	Term
LEXINGTON LN & SHERIDAN CT	Other (Low Priority Use)	0	1	0	0	0	3	N	N/A	Long-Term
BALSAM DR & RAYMOND DR	Other (Low Priority Use)	0	1	0	0	0	3	N	N/A	Long-Term
KODIAK DR & VALDEZ LN	Other (Low Priority Use)	0	2	0	0	0	3	N	N/A	Long-Term
RINGHOFFER DR	Other (Low Priority Use)	0	2	0	0	0	3	N	N/A	Long-Term
LA MAR CT	Other (Low Priority Use)	0	1	0	0	0	3	N	N/A	Long-Term
CSAH 13 & RINGHOFFER DR	Other (Low Priority Use)	0	1	0	0	0	3	N	N/A	Long-Term
FAIRBANKS DR & ROLLING GREEN LN	Other (Low Priority Use)	0	1	0	0	0	3	N	N/A	Long-Term
SUNDANCE LN	Other (Low Priority Use)	0	1	0	0	0	3	N	N/A	Long-Term
RED TAIL LN	Other (Low Priority Use)	0	1	0	0	0	3	N	N/A	Long-Term
ROLLING GREEN LN	Other (Low Priority Use)	0	5	0	0	0	3	N	N/A	Long-Term
SIMON CT	Other (Low Priority Use)	0	1	0	0	0	3	N	N/A	Long-Term
Howard Dr W	Other (Low Priority Use)	0	0	1	0	0	3	N	N/A	Long-Term
ASPEN LN	Other (Low Priority Use)	2093	7	0	0	0	3	N	N/A	Long-Term
RAMP US 14	Other (Low Priority Use)	0	0	0	1	0	3	N	N/A	Long-Term
Long-Term (2039 and Later) Totals		33291	222	2	1	335	-			Long-Term
North Mankato ADA Facilities Totals		81835	667	11	30	2705	-			

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

**Programmed (P) Short-Term projects are those projects programmed into the City of Mankato Community Investment Plan for the next five years that include improvements to pedestrian infrastructure.

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

I. Appendix 4-B: City of North Mankato, MN Self-Evaluation – Policy and Practice Review

A. 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. Revisions to plans and policies identified in this section will be considered for inclusion into those documents during their regular, scheduled updates. Policies and practices that relate to accessibility and ADA conformance include:

1. *The City of North Mankato Comprehensive Plan (2015):*

a) 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 sidewalk is 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.

b) 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.

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.

Policy Understanding:

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

1. Amend the Plan to include policies for the compliant design of pedestrian facilities based on best practices outlined in the Public Rights-of-Way Accessibility Guidelines (PROWAG) as adopted by MnDOT.

2. *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.

3. *Pavement Management Plan (2014):*

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 64 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:

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

4. *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.

5. *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:

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

6. *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:

1. 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.

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

I. Appendix 4-C: City of North Mankato Capital Improvements Plan (CIP) Projects and Planned Roadway Projects That Include (Consider) Accessible Pedestrian Infrastructure

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:

Project Location	Proposed Improvements	Year
Commerce Drive – Lookout Drive to Lor Ray Drive	Street resurfacing project with sidewalk and trail enhancements including completing an incomplete sidewalk segment on the north side and adding a multi-use path on the south.	2019-2020
Howard Drive – Lookout Drive to Lor Ray Drive	Safe Routes to School project around Dakota Meadows school in North Mankato, improve various crossings and construct trails.	2020
Monroe Avenue, Garfield Avenue, Center Street, Range Street – Surrounding Monroe and Bridges Elementary Schools	Construct ped/bike trail, ADA, curb extensions, striping and create pick up/drop off area.	2021

The City 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 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

I. Appendix 4-D: 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 in North Mankato.

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

- **Public Open Houses:**

MAPO agencies held two public open houses to gather input on the state of pedestrian infrastructure in each jurisdiction and priority preferences for projects moving forward. Open house summaries are in **Part 1 – Appendix 1-A.1 and 1-A.2**. The second open house was held at the North Mankato Police Annex on March 6, 2019.

- **Project Website:**

The project website was live for the duration of the project and provided notifications, contact information, project updates and information, and an interactive grievance procedure in which participants can report on areas in the community that are not accessible. This document was also available for public comment on the website between the dates of February 6, 2019 to March 20, 2019.

Appendix 4-E: Greivance Procedure

I. Appendix 4-E: City of North Mankato 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:

A. 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.

B. 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 North Mankato, MN ADA Grievance Form

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

City of North Mankato ADA Coordinator
City of North Mankato, MN
1001 Belgrade Avenue,
North Mankato, MN 56002

Or it can be e-mailed to: michaelf@northmankato.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: _____

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

I. Appendix 4-F: Responsible Officials and Key Staff

A. Responsible Officials Contact Information

1. City of North Mankato ADA Coordinator:

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Appendix 4-G: ADA Design Standards and Procedures

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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 (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.

B. Design Procedures

1. 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.

2. 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.