

# Americans with Disabilities Act

## Self-Evaluation and Transition Plan

City of Redwood Falls, MN  
DRAFT - January 2022



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## I. INTRODUCTION

### A. Transition Plan Need and Purpose

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

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

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

As required by Title II of [ADA, 28 CFR. Part 35 Sec. 35.105 and Sec. 35.150](#), the City of Redwood Falls has conducted a self-evaluation of its facilities within public rights-of-way and has developed this Transition Plan detailing how the organization will ensure that all of those facilities are accessible to all individuals.

### B. ADA and its Relationship to Other Laws

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

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

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

### C. Agency Requirements

Under Title II, the City of Redwood Falls 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](#)]
- Must make reasonable modifications to policies, practices and procedures that deny equal access to individuals with disabilities unless a fundamental alteration in the program would result [[28 C.F.R. Sec. 35.130\(b\) \(7\)](#)].
- May not provide services or benefits to individuals with disabilities through programs that are separate or different unless the separate or different measures are necessary

to ensure that benefits and services are equally effective [[28 C.F.R. Sec. 35.130\(b\)\(1\)\(iv\) & \(d\)](#)].

- Must take appropriate steps to ensure that communications with applicants, participants and members of the public with disabilities are as effective as communications with others [[29 C.F.R. Sec. 35.160\(a\)](#)].
- Must designate at least one responsible employee to coordinate ADA compliance [[28 C.F.R. Sec. 35.107\(a\)](#)]. This person is often referred to as the "ADA Coordinator." The public entity must provide the ADA coordinator's name, office address, and telephone number to all interested individuals [[28 C.F.R. Sec. 35.107\(a\)](#)].
- Must provide notice of ADA requirements. All public entities, regardless of size, must provide information about the rights and protections of Title II to applicants, participants, beneficiaries, employees, and other interested persons [[28 C.F.R. Sec. 35.106](#)]. The notice must include the identification of the employee serving as the ADA coordinator and must provide this information on an ongoing basis [[28 C.F.R. Sec. 107\(a\)](#)].
- Must establish a grievance procedure. Public entities must adopt and publish grievance procedures providing for prompt and equitable resolution of complaints [[28 C.F.R. Sec. 35.107\(b\)](#)]. This requirement provides for a timely resolution of all problems or conflicts related to ADA compliance before they escalate to litigation and/or the federal complaint process.

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

## II. SELF-EVALUATION

### A. Overview

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

The Self-Evaluation also examines the condition of the city's Pedestrian Circulation Route/Pedestrian Access Route (PCR/PAR) and identifies potential need for PCR/PAR infrastructure improvements. This will include the sidewalks, curb ramps, bicycle/pedestrian trails, traffic control signals, and transit facilities that are located within the city public rights-of-way. Any barriers to accessibility identified in the Self-Evaluation and actions to remedy identified barriers are identified in this document and appendices. Pedestrian facilities were evaluated for ADA deficiencies throughout the city. Pedestrian facilities located within MN Department of Transportation (MnDOT) or Redwood County right-of-way were not included in this evaluation unless a cost-share agreement exists between the city and those agencies for the maintenance/reconstruction of facilities.

### B. Methodology

The Self-Evaluation field data inventory occurred between May 19, 2021 and July 9, 2021. During this time, city staff had the above-mentioned components of the PCR/PAR

environment inventoried using the latest GPS technology to collect field data for pedestrian infrastructure features. The data collection plan included an assessment of county and state roadways within the City of Redwood Falls. While these facilities are not the responsibility of the city, data was collected during the survey since it plays a role in understanding ADA needs in the area and presented substantial cost savings. Data was imported into Esri ArcGIS for analysis, reporting, and mapping as part of the Transition Plan. ADA accessibility evaluation included the following:

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

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

Rating	Pedestrian Ramp Condition Rating
1	Uniform slopes, no noticeable cracks, no vertical discontinuities, no spalling, joints intact
2	Uniform slopes, some cracks, vertical discontinuities less than ¼”, no spalling, joints intact
3	Gutter slope beyond flare flows back towards curb ramp at <1.5%, some large cracks and minor spalling, noticeable vertical discontinuities, joints beginning to deteriorate, no detectable warnings
4	Gutter slope beyond flare flows back towards curb ramp at >1.5%, many cracks, multi-directional, excessive spalling, excessive vertical discontinuities, joints badly deteriorated, >1/2” vertical discontinuities, no detectable warnings

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

- Maximum ramp slope is less than or equal to 8.34% (1/12 rise/run ratio)
- Cross slope is less than or equal to 2% (1/50 rise/run ratio)
- Presence of a landing area greater than or equal to 4-feet by 4-feet and less than or equal to 2% cross slopes in all directions.
- An ADA-compliant detectable warning\* is present (i.e., truncated domes, brushed concrete, etc.)

Pedestrian ramps receiving a condition rating of 3 or 4 and not exhibiting the above criteria are not compliant with ADA and are candidates for future reconstruction. The timeline for modification of each of these pedestrian ramps will depend on its priority ranking, correlation to planned projects, reasonable accommodation requests, and available funding.

\*A note on detectable warnings: Current guidance from the US Access Board and ADA standards require the use of truncated domes as the only acceptable detectable warning for new ramp construction. However, MnDOT does not require agencies to retrofit truncated domes into ramps where brushed concrete, exposed aggregate, or another detectable warning that was previously acceptable under standards at that time were employed. Ramps were identified as compliant if one of these types of detectable warnings were present and all other ramp elements were compliant. If a ramp with this type of detectable warning is adjacent to an alteration project such as roadway reconstruction or repaving, MnDOT requires that a truncated dome detectable warning device be installed.

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

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

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

Rating	Sidewalk and Trail Condition Rating
1	Sidewalk is smooth with no vertical discontinuities
2	Sidewalk has vertical discontinuities less than ½ inch, and the surface still passable
3	Sidewalk has vertical discontinuities more than ½ 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 exhibit the following:

- Sidewalk width is a minimum of 4 feet, with 5-foot passing zones at a maximum distance of 200 feet apart (passing zone does not apply when the sidewalk is a continuous 5 feet wide).
- 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.

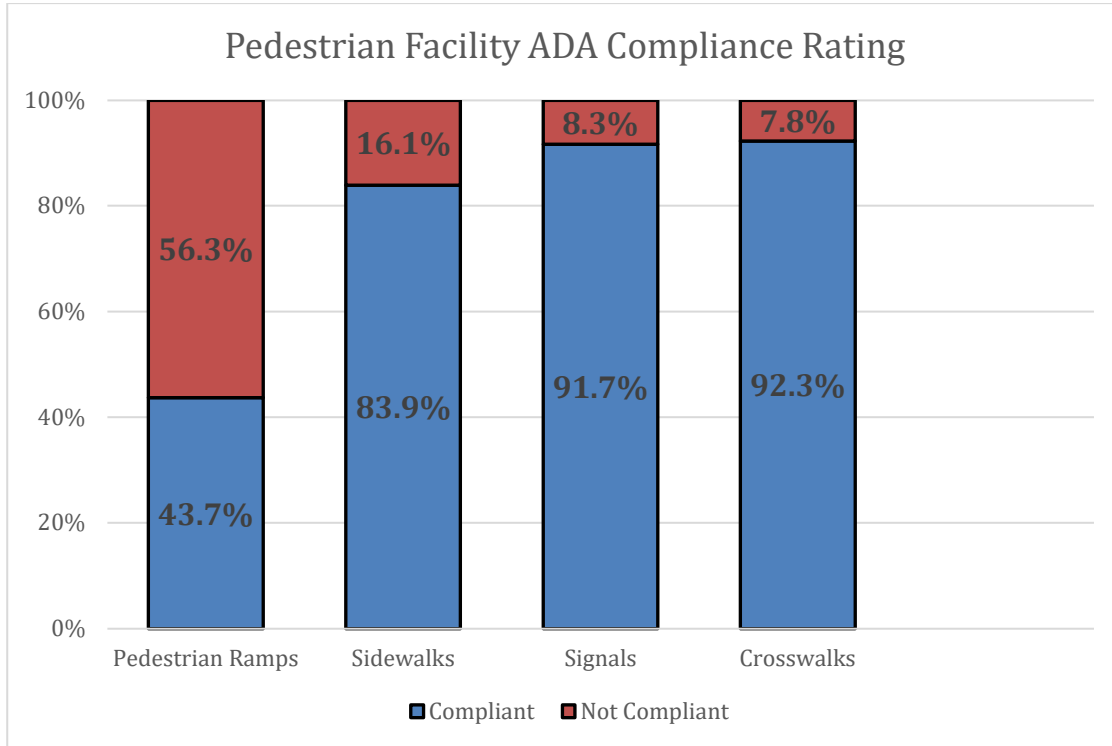
- Crosswalks – Crosswalks were evaluated for their general condition. Marked crosswalk locations were assessed for marking visibility issues and pavement condition.
- Signals – Signals were evaluated for the presence of Accessible Pedestrian Signal (APS) technology. Signals with APS are compliant with ADA standards, Signals without it are not.

APS technology communicates crossing information (i.e., Walk/Don't Walk) in a non-visual format (audible tones/messages or vibrotactile surfaces), allowing people who are blind or have low vision to use the facility safely

#### C. Summary of Self-Evaluation Inventory

The City of Redwood Falls conducted the Self-Evaluation review of programs during the summer of 2021, starting on May 19, 2021 and concluding on July 9, 2021. This included an inventory of pedestrian facilities within public rights-of-way. **Figure 1** provides a summary of ADA compliance among the surveyed pedestrian facilities in Redwood Falls, which includes pedestrian ramps, sidewalks/trails, signals, and crosswalks. **Table 1** details-ADA compliance and non-compliance with the actual number of facilities by type.

**Figure 1: Pedestrian Facility ADA Compliance in Redwood Falls**



**Table 1: Redwood Falls Infrastructure ADA-Compliance Rate**

Infrastructure Type	Compliant	Non-compliant	Total	Percent Compliant
Pedestrian Ramps	236	304*	540	43.7%
Sidewalks (Sq. Ft.)	105,243	20,227	125,470	83.9%
Signals	11	1	12	91.7%
Crosswalks	131	11	142	92.3%

**\*This includes missing ramps. The survey identified 171 instances where a ramp should be present, but was not, in addition to 133 ramps that were existent but not in compliance with ADA standards.**

Of the 540 pedestrian ramps in Redwood Falls, 236 were found to be in compliance with ADA standards, while 304 were not. This total includes missing ramps as being non-compliant. Non-complaint ramps are mostly located in downtown Redwood Falls and the residential development that immediately surrounds downtown, roughly bordered by Gould Street and Minnesota Street to the east and west, and Bridge Street/MN-19 and Flynn Street to the north and south.

About 84 percent of sidewalks were determined to be ADA-compliant. Approximately 4,000 linear feet (20,227 square feet when allocating for five-foot-wide sidewalks) were not in compliance. Similar to pedestrian ramps, much of the non-complaint infrastructure is located within the downtown area and residential development immediately surrounding downtown Redwood Falls.

Most crosswalks assessed (131 out of 142 total) were ADA-compliant. Owing to the small number of non-compliant crosswalks, it is not possible to state general geographic trends of compliance and non-compliance within the data. However, there are numerous locations within Redwood Falls where a compliant crosswalk services a non-compliant pedestrian ramp or sidewalk, which greatly diminishes the utility of the crosswalk for people with limited

mobility.

Additionally, 12 signals at 5 intersections were evaluated. Only one signal evaluated was not in compliance. Owing to the small number of non-compliant pedestrian crossing signals, there is no trend in the patterns of compliance or non-compliance. The non-compliant pedestrian signal is on the northwest corner of East Bridge Street/MN-19 & County Highway 101, which connects an industrial business park and several dining options to a mobile home development directly to the south.

One at-grade railroad pedestrian crossing was assessed for compliance, where the Canadian Pacific Soo Line crosses the convergence of Main Street South & CH 101 in North Redwood Falls.

Downtown Redwood Falls exhibits the highest concentration of non-compliant infrastructure, but this is mostly due to the prevalence of much of the city's pedestrian infrastructure located here. Most of the sidewalks, crosswalks, and curb ramps are complaint. However, this self-evaluation does not evaluate a general lack of pedestrian infrastructure. The city largely lacks dedicated pedestrian facilities in developments north of MN-19/Bridge Street, as well as to the east of Gould Street.

### III. POLICIES AND PRACTICES

The City of Redwood Falls is required, under Title II of the ADA and 28 CFR 35.105, to perform a self-evaluation of its policies, practices, and programs. The goal of this self-evaluation is to verify that, in implementing the policies and practices, the city is providing accessibility and not adversely affecting the full participation of individuals with disabilities. The self-evaluation identifies policies and practices that affect accessibility and examine city implementation of these policies.

#### A. Previous Practices

Since the adoption of the ADA, the City of Redwood Falls has endeavored to provide accessible pedestrian features as part of the city's capital improvement projects and through city ordinances for site plan review and subdivision of land. As additional information was made available as to the methods and standards of providing accessible pedestrian features, the city updated its procedures to accommodate these methods.

#### B. Redwood Falls ADA Policy

The City of Redwood Falls is committed to providing accessible pedestrian infrastructure as part of the city's capital improvement projects and via all applicable ordinances. Redwood Fall's goal is to continue to provide accessible pedestrian design features as part of the city's capital improvement projects. The city follows MnDOT accessibility policy and uses all MnDOT standard plates for accessible design (see **Appendix G**). These standards and procedures will be kept up to date with nationwide and local best management practices.

The city will consider and respond to all accessibility improvement requests. All accessibility improvements that have been deemed reasonable will be scheduled consistent with transportation priorities and available funding. 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 Redwood Fall's ADA Coordinator (see **Appendix F**).

Maintenance of pedestrian facilities within the public rights-of-way will continue to follow the policies set forth by the city. The current policies were reviewed, and potential changes were discussed. The breakdown of relevant policies can be seen in **Appendix H** which includes relevant excerpts of the following documents:

- City of Redwood Falls City Code
- City of Redwood Falls 2035 Comprehensive Plan (2016)

### New Construction

The City of Redwood Falls has the discretion to determine the need for a new sidewalk or shared use trail with new street construction projects. 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. Street reconstruction projects will require reconstruction of any non-compliant pedestrian curb ramps and sidewalks to meet ADA standards.

### Rehabilitation/Resurfacing projects

All city major rehabilitation and resurfacing projects will include construction of missing or non-compliant pedestrian curb ramps as needed.

Curb ramps must be brought into compliance with roadway construction activities determined to be alterations per current US Department of Transportation / Department of Justice requirements. Alterations include new asphalt layers, mill and overlay, major rehabilitation, and similar activities. Routine maintenance does not require curb ramp upgrades. Maintenance includes seal coats, crack filling/sealing, fog seals, pavement patching and similar activities.

### Stand Alone Projects

As grant or additional city funding opportunities are available, independent ADA projects may be undertaken by the city. Candidate sites will be evaluated on a case-by-case basis for facility condition, pedestrian volumes, public safety, public benefit, and improvement costs as well as the ability to provide alternative barrier removal options. 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 Public Services Director.

### Development Projects

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

## IV. IMPLEMENTATION PLAN

### A. Priority Areas

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

#### Priority Level 1 – High Priority

- Locations exhibiting accessibility barriers identified through the public process by stakeholders and the general public.
- Locations and roadway segments serving Level 1 facilities including:
  - Government facilities (city, county, state)
  - Public libraries
  - Public and private primary and secondary schools (within a one-quarter mile radius from the school property)
  - Hospitals, health clinics and health centers (public and private)
  - Public housing and homeless shelters, including senior facilities and rehabilitation facilities
  - Colleges, universities, and technical schools
  - Transportation hubs (includes bus lines and transit stations)
  - Parks

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

#### 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

### B. Severity Index

Within these priority levels, projects were ranked using a severity index, a method of identifying the locations that are the least compliant and most in need of replacement. This rating runs from 0 to 10, with 0 being compliant and 10 being the most non-compliant. The overall score takes into account a variety of data collected in the Self-Evaluation Inventory, including ramp and gutter condition, slope class, ramp width, and size of the landing area.

The City of Redwood Falls used the priority ranking outlined above combined with the severity index to create the plan and schedule for integrating ADA compliance projects in future street projects. Priority 1 locations are ranked by their severity index and then ordered

so that locations most in need of repair are prioritized. Reporting on the results of the Self-Evaluation is included in **Appendix B**.

**C. External Agency Coordination**

Many other agencies are responsible for pedestrian facilities within the jurisdiction of the City of Redwood Falls. Because of a prior agreement, this survey includes a substantial amount of property in need of remediation that is the responsibility of the county or state. The city will coordinate with these agencies and others as needed to track and assist in the facilitation of the elimination of accessibility barriers along their routes.

**D. Cost Estimates**

Planning-level cost estimates were prepared for non-compliant ADA infrastructure. These estimates are based on design engineering expertise and 2021 bid pricing and are detailed in Table 2 below. They are subject to change over time due to inflation and changes in material and labor costs.

**Table 2: Planning-Level Cost Estimates for Remediation Categories**

Infrastructure Type	Planning-Level Cost
Sidewalks and Trails	\$6/Sq. Ft.
Pedestrian Ramps	\$1,000/Detectable Warning \$6,000/Full Ramp Reconstruct
Crosswalks	\$500/Each
Signals (APS)	\$7,000/Corner
Barriers	\$8/Sq. Ft.

Sidewalk, Trail and Barrier Remediation

The conditions of mainline sidewalks and trails had been classified and inventoried by city staff during the data collection period. For cost estimating purposes, an entire segment of sidewalk or trail was classified as non-compliant if it contained multiple smaller sections that were considered non-compliant, and it would be more cost effective to replace the entire segment. This is common for sidewalk and trail located in the older parts of Redwood Falls. A planning-level cost estimate of \$6/square foot was estimated for removal and replacement of non-compliant mainline sidewalk and trail segments.

Sidewalk and trail segments that were generally ADA-compliant but contained small sections that were non-compliant do not require the entire segment to be replaced. Instead, only the areas classified as non-compliant were noted. This was common with sidewalk and trail segments constructed within the last 5-15 years and generally were in good condition and ADA compliant, except for a few isolated areas. A planning level cost of \$6/square foot was estimated for repair of these isolated areas of mainline sidewalk and trail.

The area of mainline sidewalk and trail that contained barriers such as poles, hydrants, utility boxes that were too close to the PAR, or a PAR that was too narrow, were measured by the width of the walkway multiplied by the length of the barrier to the nearest 5 linear feet. The repair area was then multiplied by a unit price of \$8/square foot.

Pedestrian Ramp Remediation

Pedestrian ramps that are ADA compliant but missing a detectable warning (such as truncated domes, tined surface, etc.) are estimated to cost \$1,000 per ramp to install a compliant detectable warning system while maintaining the existing, concrete pedestrian ramp and

landing. Ramps that have a detectable warning system compliant under earlier ADA guidance (exposed aggregate, brushed concrete) must be upgraded to include compliant truncated domes when adjacent to a street undergoing an alteration activity (reconstruction, resurfacing, etc.).

Ramps that are non-compliant because of slope, vertical discontinuities, lack of appropriate level landing and other related conditions require that the entire ramp be replaced. Replacing non-compliant ramps was estimated to cost \$6,000 each. Note that site-specific conditions for ramps can vary widely, affecting cost.

Crosswalk Remediation

Crosswalk compliance was estimated to be \$500 per crosswalk.

APS Signal Remediation

Each signal that was classified as non-compliant was estimated to cost \$7,000 per corner bring into compliance and add APS. The cost of adding APS signal elements can vary significant for each signal location depending on the width of roadways and other factors.

F. Implementation Schedule

Overall, this Plan estimates \$2.4M (2021 dollars) in ADA improvements are necessary for pedestrian facilities throughout the city. This includes \$0.6M for Mainline Sidewalk and Trail Remediation, \$1.7M for Pedestrian Ramp Remediation, \$5,500 for Crosswalk Remediation, and \$500 for Signal Remediation. Redwood Falls aims to achieve ADA compliance among these facilities responsibly, and as expeditiously as possible, recognizing that \$2.4M is a significant cost. **Table 3** shows the cost of the program for each type of pedestrian facility as well as what parts of the program take place in projects already planned by the City of Redwood Falls.

**Table 3: Estimated Costs of ADA-Compliance Needs**

Infrastructure Type	Planned Project Related Cost	Standalone Project Cost (Not Planned)	Total Cost
Sidewalks and Trails	\$356,220	250,641	\$606,861
Pedestrian Ramps	\$1,344,000	\$445,000	\$1,789,000
Crosswalks	\$4,500	\$1,000	\$5,500
Signals	\$0	\$500	\$500
Total Cost	\$1,704,720	\$697,141	\$2,401,861

The City of Redwood Falls will utilize three methods for upgrading pedestrian facilities to the current ADA standards. The first and most comprehensive of the three methods are scheduled street and utility improvement projects already in set out by the City of Redwood Falls. 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 other scheduled projects on a case-by-case basis as determined by city staff. Lastly, the City of Redwood Falls will use site redevelopment, new development, and cooperative agreement projects to bring all adjacent pedestrian facilities into compliance. Cooperative agreements are of a significant importance for the city’s ADA transition plan, since addressing a significant amount of the identified deficiencies will require coordination between the state and county road authorities to share costs and schedule improvements.

Much of the work necessary to bring Redwood Falls' pedestrian infrastructure into compliance with ADA standards is part of scheduled projects. This will include \$356,220 for sidewalk remediation, \$1.34M for pedestrian ramp remediation, and \$4,500 for crosswalk remediation. The remaining balance of \$704,141 is needed to improve remaining facilities but is not associated with other planned projects. A full 71% (\$1.7M) of the cost of ADA needs identified in this plan are part of already planned projects.

New instances of non-compliance will surface routinely as normal wear-and-tear and extreme weather take their toll on pedestrian facilities. These conditions will likely prevent any Minnesota city from achieving 100% ADA compliance among facilities. However, known deficiencies have been carefully prioritized in this plan to ensure steps are taken where they matter most, and in the shortest timeframe possible. With this in mind, Redwood Falls aims to improve deficiencies identified in this plan over a 30-year period. The improvements made in the first decade will be contained in related scheduled projects, with the following 20-year period being improvements made to non-scheduled project locations. It is anticipated that during the first decade, scheduled projects will average to a cost of \$170K per year, with the following two decades averaging an annual cost of \$35K to complete the remaining accessibility features defined in this plan. Both figures use 2021 dollars. This does not include unknown contributions from private development or potential cooperative agreements which will decrease the future cost to the city.

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

- After 10 years, 71% of accessibility features identified in this Plan would be improved.
- After 30 years, 100% of accessibility features identified in this Plan would be improved.

The City of Redwood Falls anticipates updating this plan every five years to capture new instances of non-compliance and to document progress achieved over time. This plan serves as a framework for the city to follow and implementation goals may change as the city pursues ADA compliance.

## V. ADA COORDINATOR

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

## VI. PUBLIC OUTREACH

The City of Redwood Falls recognizes that public participation is an important component in the development of this document. Input from the community has been gathered and used to help define priority areas for improvements within the public rights-of-way of the City of Redwood Falls.

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

- City Website  
A city website (<https://ci.redwood-falls.mn.us/ADA>) was established as a place to house the ADA Transition Plan and collect public comment on the draft plan or other areas not identified in the plan that they find problematic. The website will be used in the future as a location to post ADA transition plan updates and note ongoing progress.
- In-Person Comment

A printed copy of this plan along with paper comment forms was made available at Redwood Falls City Hall (333 South Washington Street, Redwood Fall, MN) from Tuesday, January 18, 2022 to Monday, February 14, 2022.

- Public Notification/News Release  
Notification of the Draft ADA Plan Availability and Public Comment Period was posted on City of Redwood Falls social media and was published in the Redwood Falls Gazette on January 18, 2022, running in both print and online editions for four weeks.

## VII. GRIEVANCE PROCEDURE

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

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

## VIII. MONITOR THE PROGRESS

Progress will be monitored annually, and this document will be updated every five years to reflect the City of Redwood Fall's progress toward complying with the ADA and providing accessible pedestrian infrastructure. The appendices in this document will be updated periodically to account for improvements. With each update to the main body of this document, a public comment period will be provided to communicate findings and seek feedback.

## Appendix A: Deficiencies

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

Figure A.1 – Commonly Identified Deficiencies



Vertical Discontinuity



Horizontal Discontinuity



Cross Slope



Cracking



Ponding



Vegetation



Spalling



Vertical Slope

Figure A.2 – Sidewalk Obstruction Examples



Fire Hydrant



Lighting Pole



Traffic Signal Handhole



Traffic Signal Pole



Utility Pole



Water Gate Valve

## Appendix B: Self-Evaluation

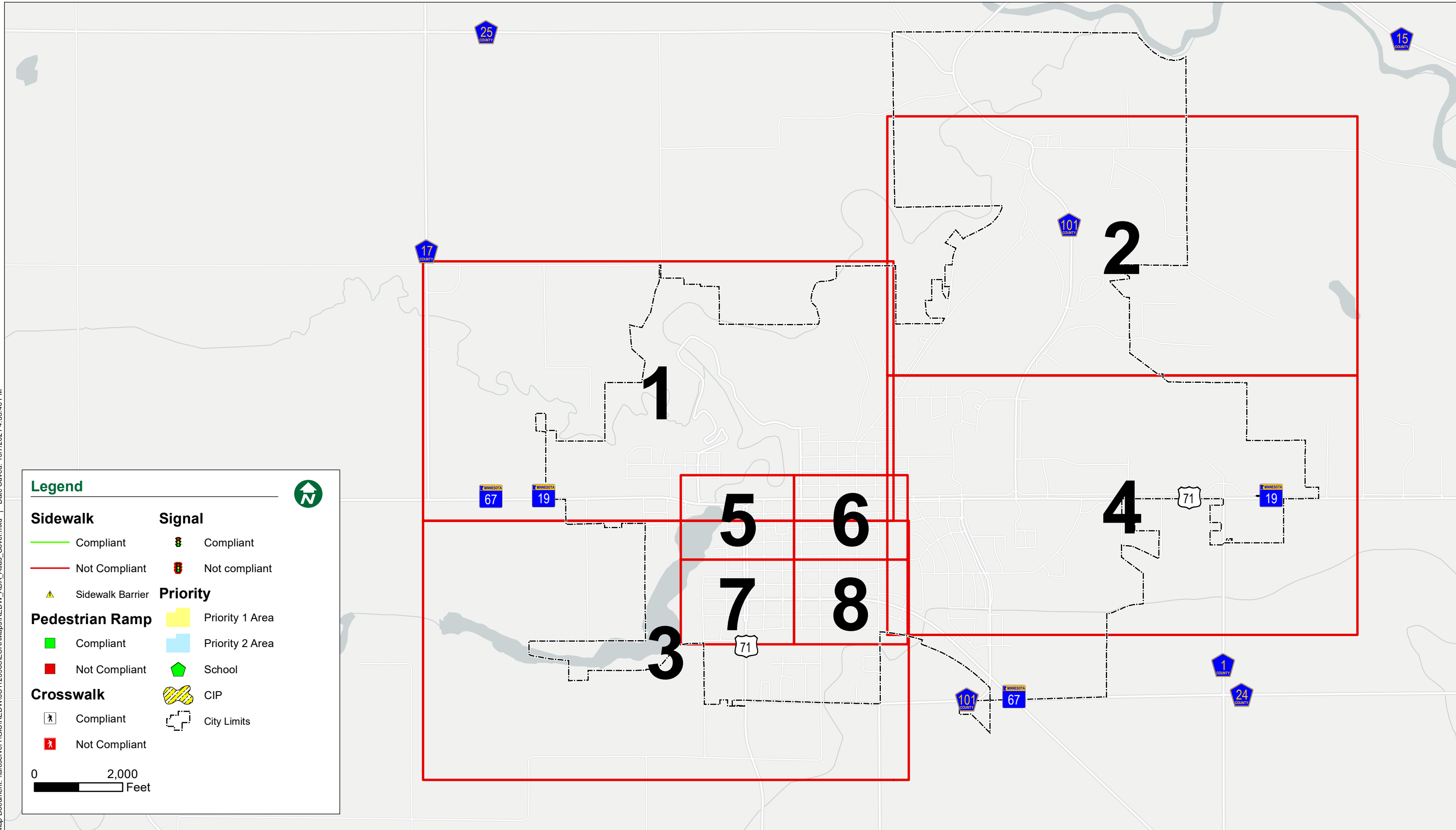
Table B-1: City of Redwood Falls Program Review - Implementation Plan

Location	Land Use	Sidewalk Remediation Cost	Pedestrian Ramp Remediation Cost	Bus Stop Remediation Cost	Traffic Signal Remediation Cost	Crosswalk Remediation Cost	Barrier Remediation Cost	Priority	Severity	City	CIP Project	Total Cost	Rank	Running Total Cost
S GOULD ST	Schools; Central Business Districts, Shopping Malls, Supermarkets and Strip Retail; Hospitals, Health Clinics, and Medical Facilities (Public and Private); Parks	\$0	\$54,000	\$0	\$0	\$0	\$0	1	1	1	4th Street Reconstruct	\$54,000	10	\$54,000
US 71 S MILL ST	Apartments; Central Business Districts, Shopping Malls, Supermarkets and Strip Retail; Central business districts, shopping malls, supermarkets and strip retail; Churches and Places of Worship; Government Facilities; Hospitals, Health Clinics, and Medical Facilities (Public and Private)	\$0	\$0	\$0	\$0	\$2,000	\$0	1	4	4	4th Street Reconstruct	\$2,000	21	\$56,000
S LINCOLN ST	Bus Stop; Central Business Districts, Shopping Malls, Supermarkets and Strip Retail; Central business districts, shopping malls, supermarkets and strip retail; Government Facilities; Hospitals, Health Clinics, and Medical Facilities (Public and Private); Libraries	\$17,011	\$30,000	\$0	\$0	\$500	\$0	1	2	2	4th Street Reconstruct	\$47,511	22	\$103,511
S WASHINGTON ST	Bus Stop; Central Business Districts, Shopping Malls, Supermarkets and Strip Retail; Central business districts, shopping malls, supermarkets and strip retail; Government Facilities; Post Offices	\$81,868	\$42,000	\$0	\$0	\$0	\$0	1	2	2	4th Street Reconstruct	\$123,868	23	\$227,379
S JEFFERSON ST	Apartments; Central Business Districts, Shopping Malls, Supermarkets and Strip Retail; Central business districts, shopping malls, supermarkets and strip retail; Government Facilities; Hospitals, Health Clinics, and Medical Facilities (Public and Private)	\$11,965	\$42,000	\$0	\$0	\$1,000	\$0	1	2	2	4th Street Reconstruct	\$54,965	24	\$282,344
COURTHOUSE SQUARE	Central Business Districts, Shopping Malls, Supermarkets and Strip Retail; Central business districts, shopping malls, supermarkets and strip retail; Churches and Places of Worship; Government Facilities; Hospitals, Health Clinics, and Medical Facilities (Public and Private)	\$0	\$0	\$0	\$0	\$0	\$0	1	0	0	4th Street Reconstruct	\$0	26	\$282,344
S HALVORSON ST	Bus Stop; Central Business Districts, Shopping Malls, Supermarkets and Strip Retail; Hospitals, Health Clinics, and Medical Facilities (Public and Private); Housing complexes, including apartments	\$16,532	\$30,000	\$0	\$0	\$0	\$0	1	6	6	4th Street Reconstruct	\$46,532	28	\$328,876
W 4th ST	Central Business Districts, Shopping Malls, Supermarkets and Strip Retail; Central business districts, shopping malls, supermarkets and strip retail	\$0	\$0	\$0	\$0	\$0	\$0	2	0	0	4th Street Reconstruct	\$0	49	\$328,876
E 4th ST	Schools; Bus Stop; Central Business Districts, Shopping Malls, Supermarkets and Strip Retail; Central business districts, shopping malls, supermarkets and strip retail; Churches and Places of Worship; Government Facilities; Post Offices	\$66,355	\$218,000	\$0	\$0	\$500	\$0	1	2	2	4th Street Reconstruct; Drew Street Reconstruct	\$284,855	3	\$613,731

Table B-1: City of Redwood Falls Program Review - Implementation Plan

Location	Land Use	Sidewalk Remediation Cost	Pedestrian Ramp Remediation Cost	Bus Stop Remediation Cost	Traffic Signal Remediation Cost	Crosswalk Remediation Cost	Barrier Remediation Cost	Priority	Severity	City	CIP Project	Total Cost	Rank	Running Total Cost
S DREW ST	Other	\$1,914	\$0	\$0	\$0	\$0	\$0	3	2		4th Street Reconstruct; Drew Street Reconstruct	\$1,914	58	\$615,645
E WYOMING ST	Schools	\$11,141	\$204,000	\$0	\$0	\$0	\$0	1	5		Drew Street Reconstruct	\$215,141	1	\$830,786
E CHESTNUT ST	Schools; Apartments; Churches and Places of Worship; Hospitals, Health Clinics, and Medical Facilities (Public and Private); Libraries	\$36,053	\$180,000	\$0	\$0	\$0	\$0	1	2		Drew Street Reconstruct	\$216,053	5	\$1,046,839
E 5th ST	Schools; Bus Stop; Central Business Districts, Shopping Malls, Supermarkets and Strip Retail; Central business districts, shopping malls, supermarkets and strip retail; Housing complexes, including apartments; Libraries	\$11,833	\$225,000	\$0	\$0	\$500	\$0	1	2		Drew Street Reconstruct	\$237,333	7	\$1,284,172
E 3rd ST	Central Business Districts, Shopping Malls, Supermarkets and Strip Retail; Central business districts, shopping malls, supermarkets and strip retail; Churches and Places of Worship; Government Facilities; Hospitals, Health Clinics, and Medical Facilities (Public and Private)	\$35,723	\$180,000	\$0	\$0	\$0	\$0	1	4		Drew Street Reconstruct	\$215,723	19	\$1,499,895
E 2nd ST	Central Business Districts, Shopping Malls, Supermarkets and Strip Retail; Central business districts, shopping malls, supermarkets and strip retail; Churches and Places of Worship; Government Facilities; Hospitals, Health Clinics, and Medical Facilities (Public and Private)	\$65,825	\$139,000	\$0	\$0	\$0	\$0	1	4		Drew Street Reconstruct	\$204,825	20	\$1,704,720
MN 67 E BROADWAY ST	Schools; Apartments	\$11,412	\$0	\$0	\$0	\$0	\$0	1	5			\$11,412	2	\$1,716,132
MC PHAIL DR	Schools	\$0	\$30,000	\$0	\$0	\$0	\$0	1	2			\$30,000	4	\$1,746,132
E COOK ST	Schools; Housing Complexes, Including Apartments; Polling Locations	\$13,952	\$24,000	\$0	\$0	\$0	\$0	1	2			\$37,952	6	\$1,784,084
SUNRISE BLVD	Schools	\$0	\$19,000	\$0	\$0	\$0	\$0	1	1.5			\$19,000	8	\$1,803,084
E TIN ST	Schools	\$0	\$12,000	\$0	\$0	\$0	\$0	1	1.25			\$12,000	9	\$1,815,084
REDWOOD FALLS HS	Schools; Polling Locations	\$0	\$12,000	\$0	\$0	\$0	\$0	1	1			\$12,000	11	\$1,827,084
EASTWOOD ESTATES	Schools; Central Business Districts, Shopping Malls, Supermarkets and Strip Retail	\$0	\$0	\$0	\$0	\$0	\$0	1	0			\$0	12	\$1,827,084
MEMORIAL PARK	Schools; Parks	\$0	\$0	\$0	\$0	\$0	\$0	1	0			\$0	13	\$1,827,084
E MEADOW LN	Schools	\$0	\$0	\$0	\$0	\$0	\$0	1	0			\$0	14	\$1,827,084
CD #52	Schools; Housing Complexes, Including Apartments; Polling Locations	\$0	\$0	\$0	\$0	\$0	\$0	1	0			\$0	15	\$1,827,084
UNION DR	Schools; Polling Locations	\$0	\$0	\$0	\$0	\$0	\$0	1	0			\$0	16	\$1,827,084
CH 101 S DEKALB ST	Schools; Central Business Districts, Shopping Malls, Supermarkets and Strip Retail; Housing Complexes, Including Apartments	\$0	\$0	\$0	\$0	\$0	\$0	1	0			\$0	17	\$1,827,084
CSAH 101	Schools	\$0	\$0	\$0	\$0	\$0	\$0	1	0			\$0	18	\$1,827,084

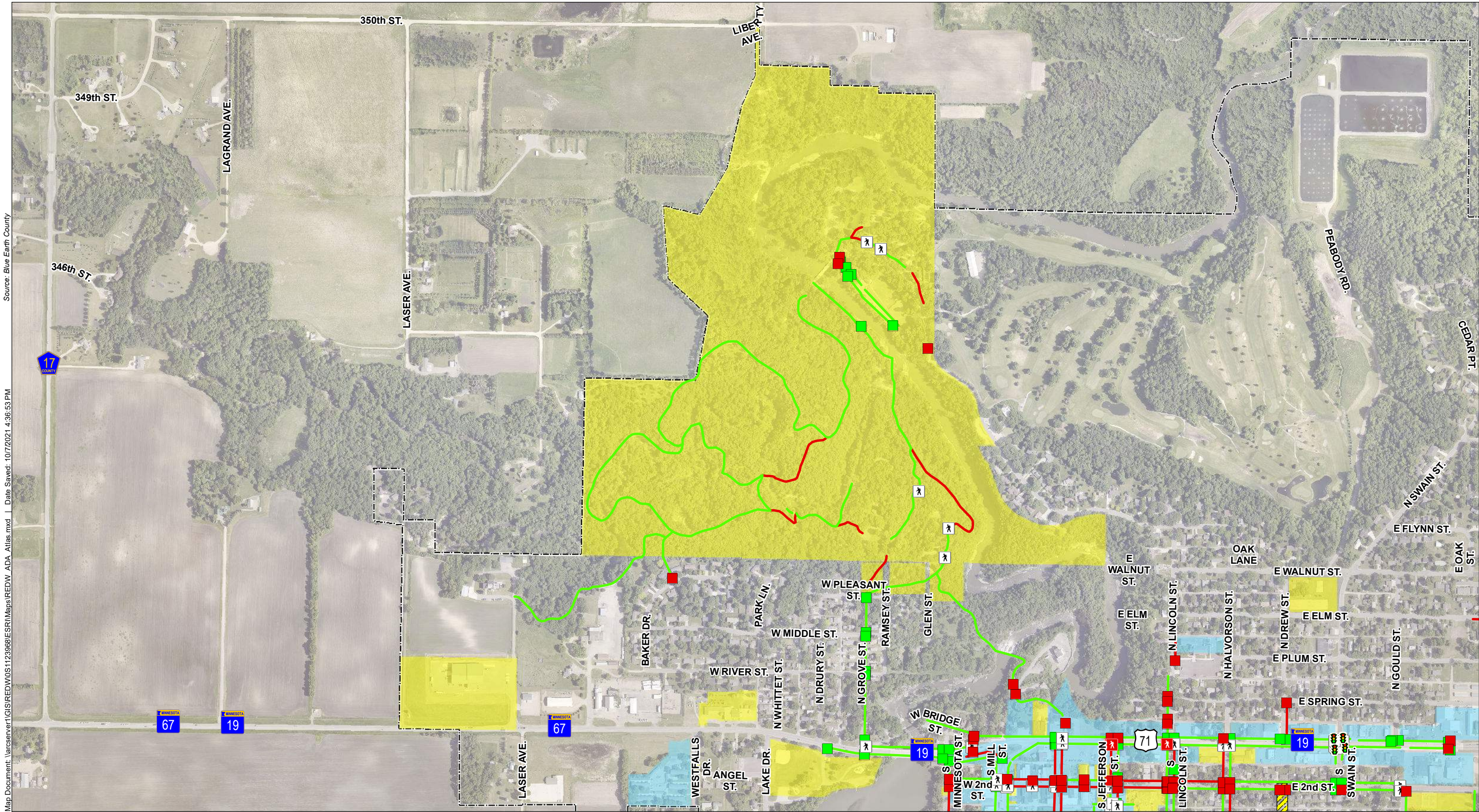
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**Legend**

Sidewalk Compliant	Signal Compliant
Sidewalk Not Compliant	Signal Not compliant
Sidewalk Barrier	<b>Priority</b>
Pedestrian Ramp Compliant	Priority 1 Area
Pedestrian Ramp Not Compliant	Priority 2 Area
Crosswalk Compliant	School
Crosswalk Not Compliant	CIP
City Limits	City Limits

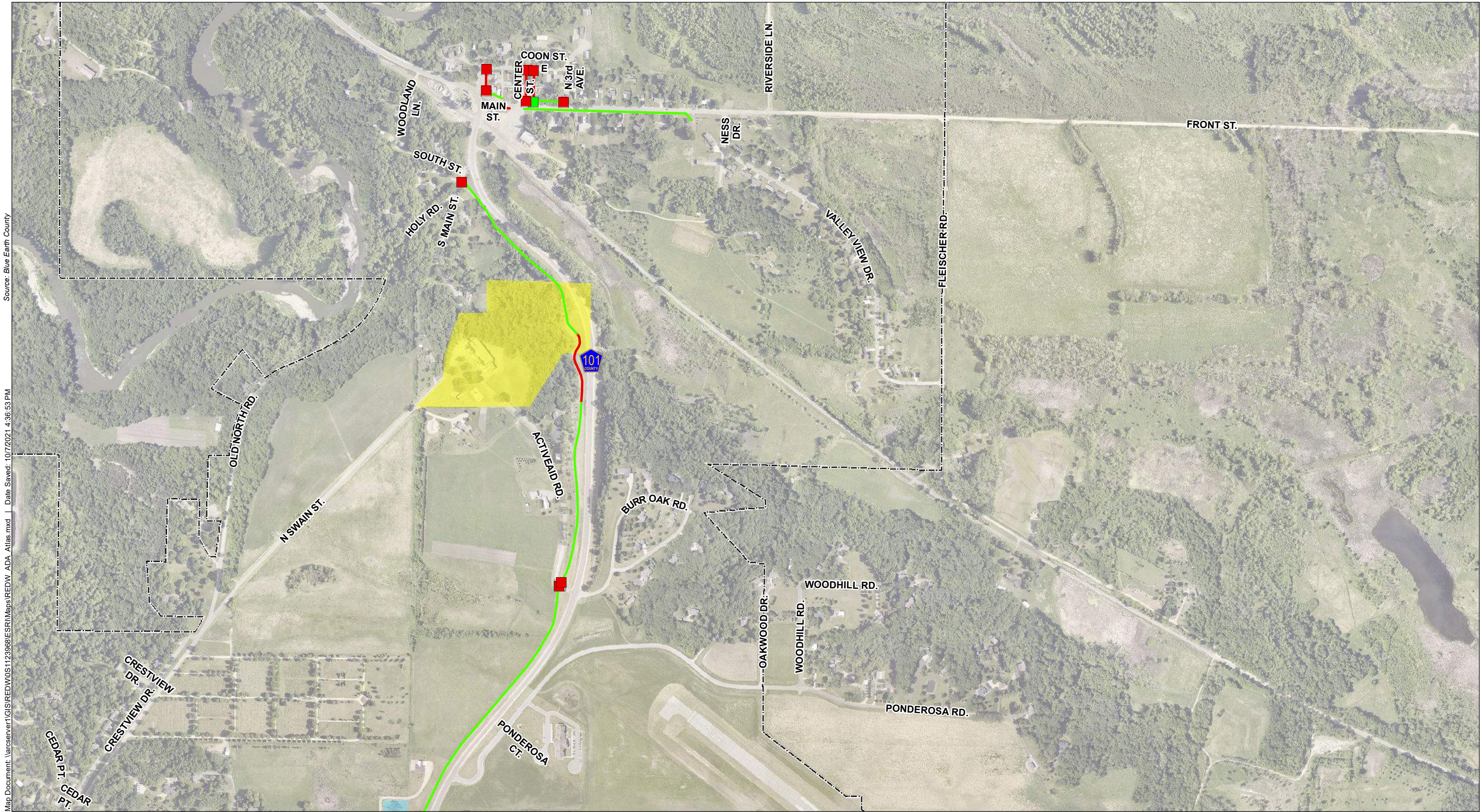
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- Figure 1 -

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Source: Blue Earth County

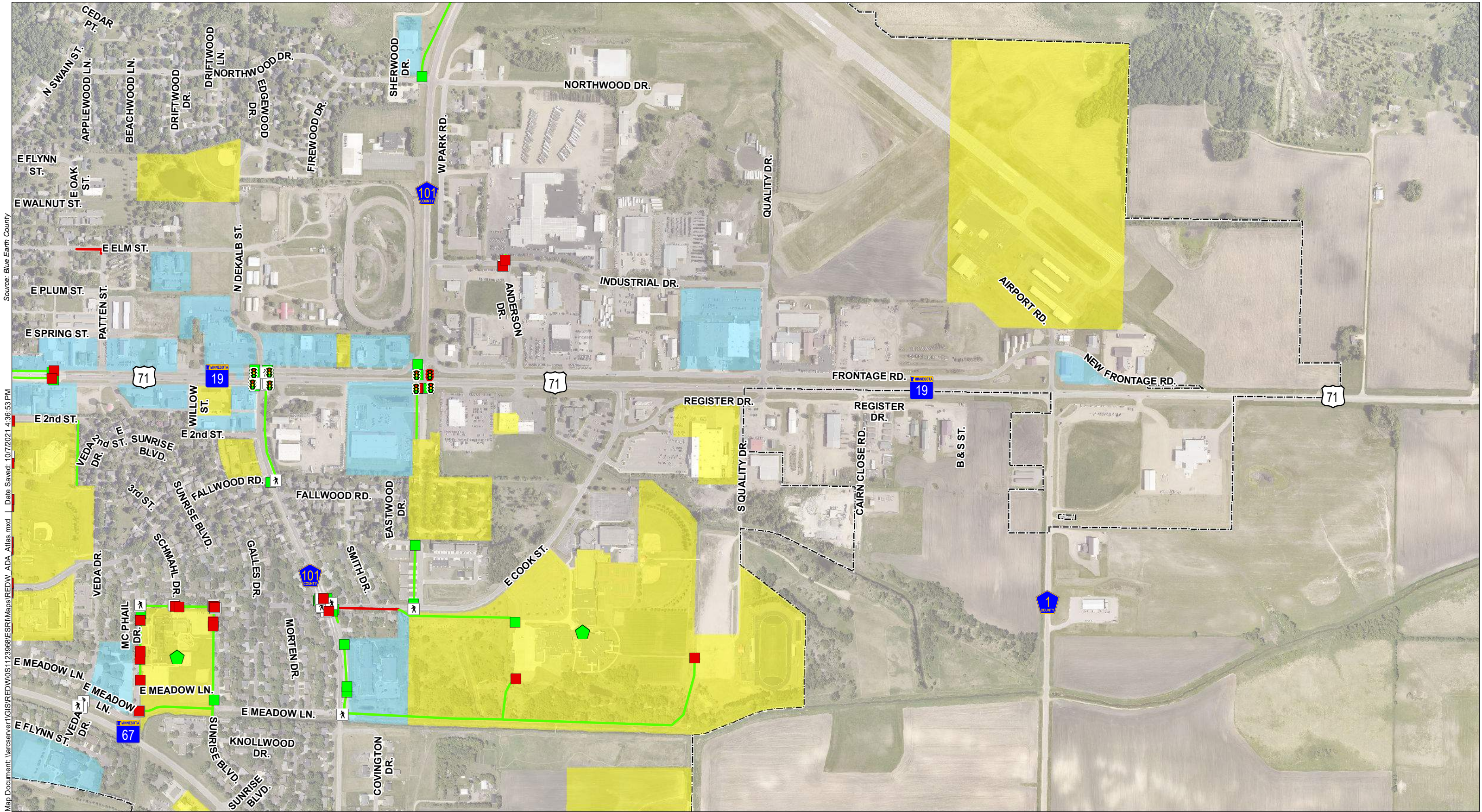
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- Figure 2 -

0 200 Feet







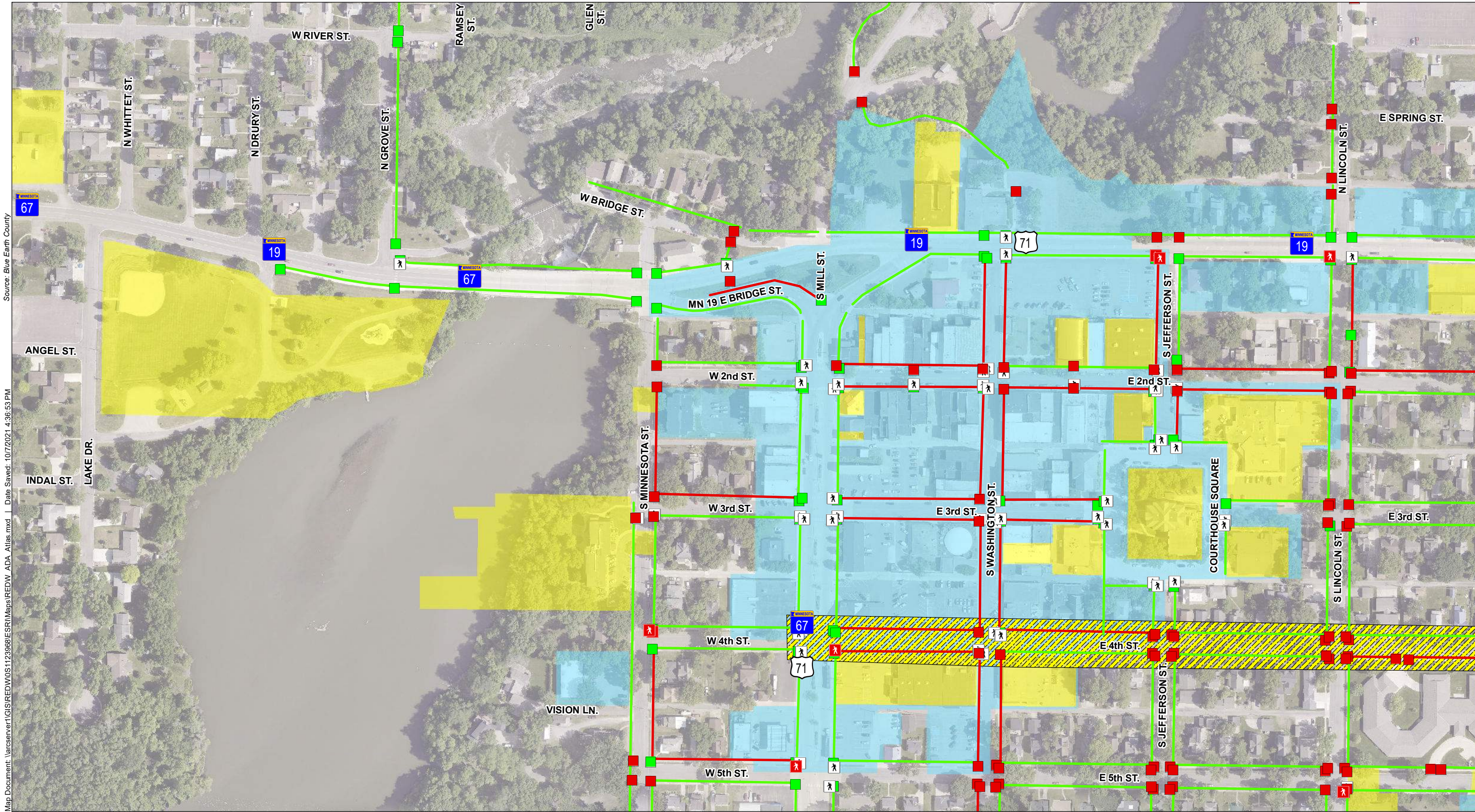
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- Figure 4 -

0 200 Feet





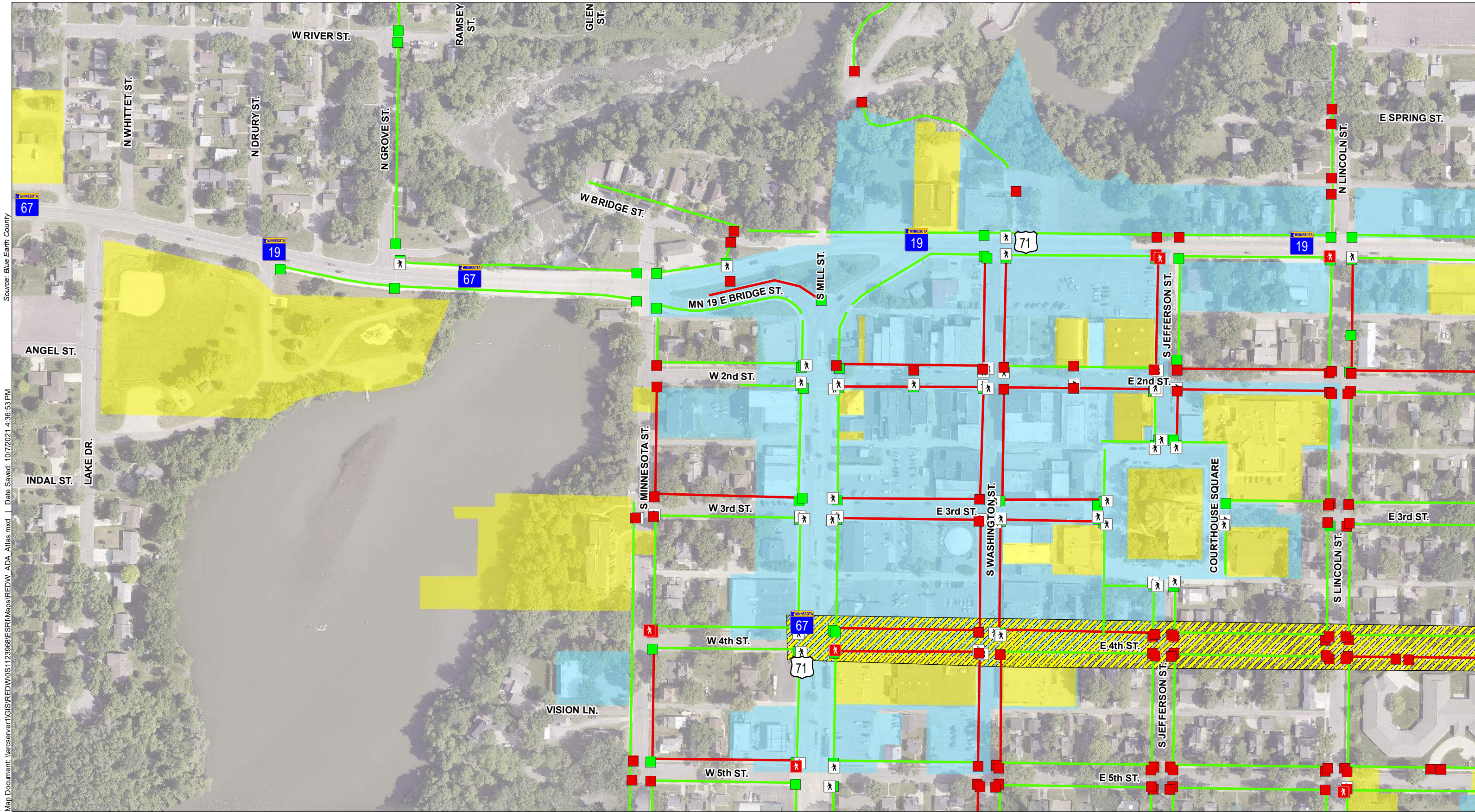
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- Figure 5 -

0 200 Feet





Source: Blue Earth County

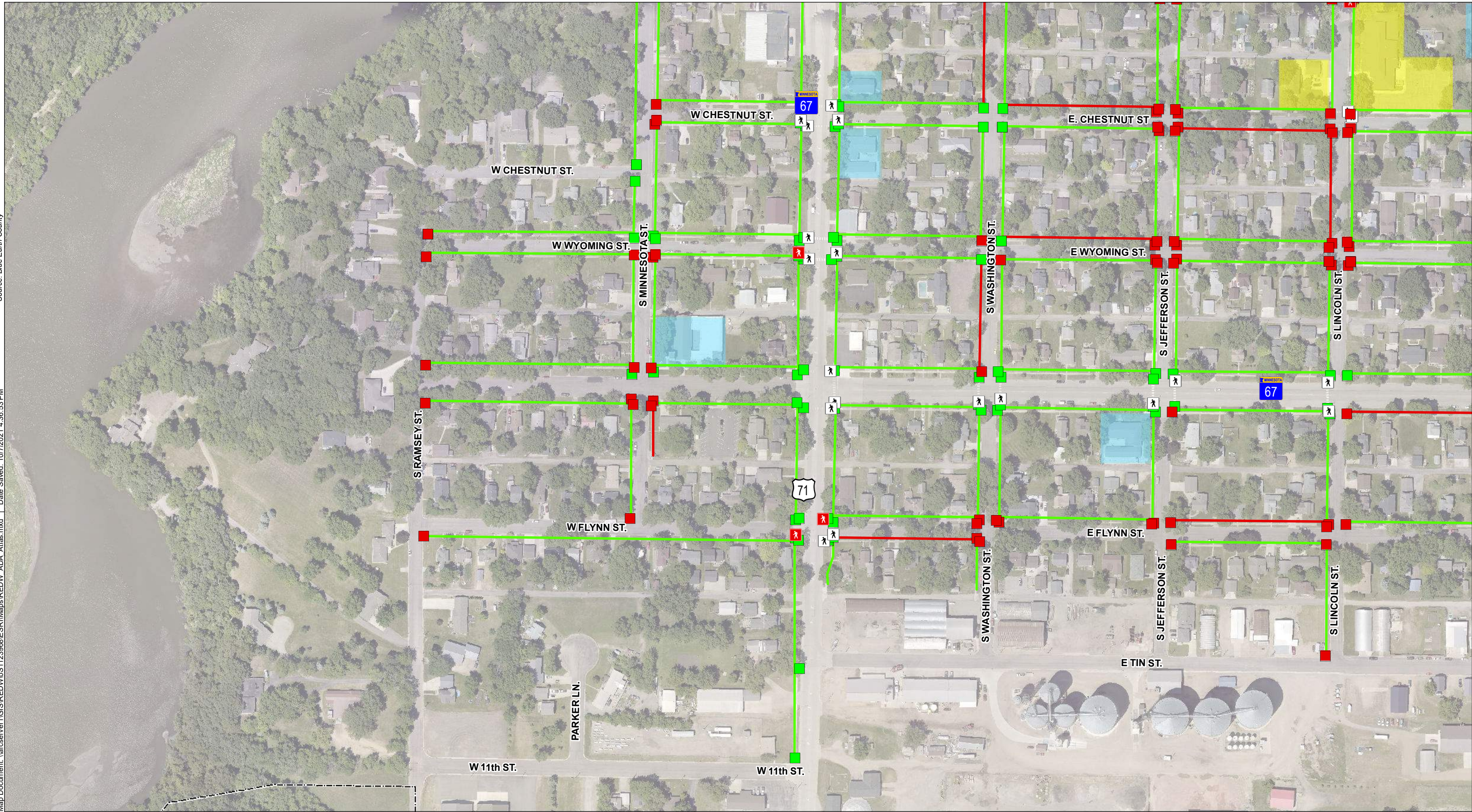
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- Figure 5 -

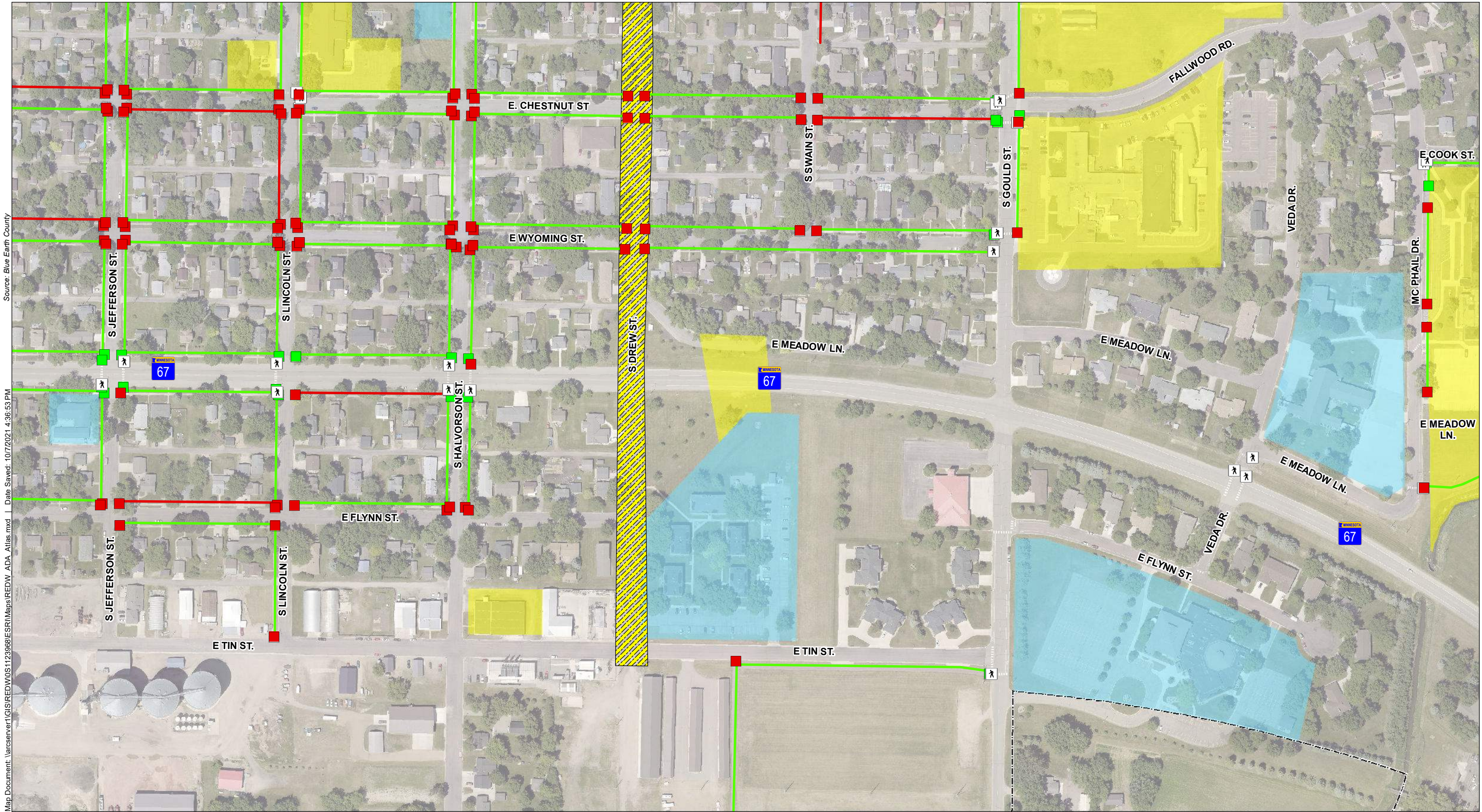
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- Figure 7 -



Source: Blue Earth County

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- Figure 8 -

Table B-1: City of Redwood Falls Program Review - Implementation Plan

Location	Land Use	Sidewalk Remediation Cost	Pedestrian Ramp Remediation Cost	Bus Stop Remediation Cost	Traffic Signal Remediation Cost	Crosswalk Remediation Cost	Barrier Remediation Cost	Priority	Severity	City	CIP Project	Total Cost	Rank	Running Total Cost
US 71 MN 19 E BRIDGE ST	Central Business Districts, Shopping Malls, Supermarkets and Strip Retail; Central business districts, shopping malls, supermarkets and strip retail; Churches and Places of Worship; Hospitals, Health Clinics, and Medical Facilities (Public and Private); Post Offices	\$0	\$24,000	\$0	\$500	\$0	\$0	1	0.9375			\$24,500	25	\$1,851,584
MCPHAIL TRL	Central Business Districts, Shopping Malls, Supermarkets and Strip Retail; Central business districts, shopping malls, supermarkets and strip retail; Churches and Places of Worship; Parks; Post Offices	\$0	\$0	\$0	\$0	\$0	\$0	1	0			\$0	27	\$1,851,584
CH 101	Central Business Districts, Shopping Malls, Supermarkets and Strip Retail; Churches and Places of Worship; Hospitals, Health Clinics, and Medical Facilities (Public and Private)	\$15,867	\$6,000	\$0	\$0	\$0	\$0	1	2			\$28,867	29	\$1,880,451
W 3rd ST	Bus Stop; Central Business Districts, Shopping Malls, Supermarkets and Strip Retail; Central business districts, shopping malls, supermarkets and strip retail; Housing Complexes, Including Apartments; Public Housing and Homeless Shelters	\$10,451	\$18,000	\$0	\$0	\$0	\$0	1	4			\$28,451	30	\$1,908,902
S MINNESOTA ST	Apartments; Bus Stop; Central business districts, shopping malls, supermarkets and strip retail; Churches and Places of Worship; Housing Complexes, Including Apartments; Public Housing and Homeless Shelters	\$20,681	\$108,000	\$0	\$0	\$1,000	\$0	1	4			\$129,681	31	\$2,038,583
W 2nd ST	Apartments; Central Business Districts, Shopping Malls, Supermarkets and Strip Retail; Central business districts, shopping malls, supermarkets and strip retail	\$0	\$0	\$0	\$0	\$0	\$0	1	0			\$0	32	\$2,038,583
REDWOOD FALLS ZOO	Parks	\$0	\$12,000	\$0	\$0	\$0	\$0	1	2.25			\$12,000	33	\$2,050,583
RAMSEY PARK	Parks	\$72,741	\$0	\$0	\$0	\$0	\$0	1	2			\$72,741	34	\$2,123,324
CH 31	Parks	\$14,215	\$6,000	\$0	\$0	\$0	\$0	1	2			\$20,215	35	\$2,143,539
MN 19	Central business districts, shopping malls, supermarkets and strip retail; Parks	\$0	\$18,000	\$0	\$0	\$0	\$0	1	1.5			\$18,000	36	\$2,161,539
MN 19 W BRIDGE ST	Parks	\$0	\$0	\$0	\$0	\$0	\$0	1	0			\$0	37	\$2,161,539
SANDERS TRL	Parks	\$0	\$0	\$0	\$0	\$0	\$0	1	0			\$0	38	\$2,161,539
N GROVE ST	Parks	\$0	\$0	\$0	\$0	\$0	\$0	1	0			\$0	39	\$2,161,539
MCPHAIL TRAIL	Central Business Districts, Shopping Malls, Supermarkets and Strip Retail; Central business districts, shopping malls, supermarkets and strip retail	\$0	\$18,000	\$0	\$0	\$0	\$0	2	10			\$18,000	40	\$2,179,539
W 5th ST	Central Business Districts, Shopping Malls, Supermarkets and Strip Retail; Central business districts, shopping malls, supermarkets and strip retail	\$10,530	\$0	\$0	\$0	\$0	\$0	2	5			\$10,530	41	\$2,190,069
MN 19 E BRIDGE ST	Central Business Districts, Shopping Malls, Supermarkets and Strip Retail; Central business districts, shopping malls, supermarkets and strip retail	\$8,555	\$0	\$0	\$0	\$0	\$0	2	4			\$8,555	42	\$2,198,624

Table B-1: City of Redwood Falls Program Review - Implementation Plan

Location	Land Use	Pedestrian						Priority	Severity	City	CIP Project	Total Cost	Rank	Running Total Cost
		Sidewalk Remediation Cost	Ramp Remediation Cost	Bus Stop Remediation Cost	Traffic Signal Remediation Cost	Crosswalk Remediation Cost	Barrier Remediation Cost							
S SWAIN ST	Central Business Districts, Shopping Malls, Supermarkets and Strip Retail	\$5,391	\$0	\$0	\$0	\$0	\$0	2	3		\$5,391	43	\$2,204,015	
N DREW ST	Central Business Districts, Shopping Malls, Supermarkets and Strip Retail	\$8,144	\$6,000	\$0	\$0	\$0	\$0	2	3		\$14,144	44	\$2,218,159	
N LINCOLN ST	Central Business Districts, Shopping Malls, Supermarkets and Strip Retail; Churches and Places of Worship	\$5,502	\$30,000	\$0	\$0	\$0	\$0	2	2		\$35,502	45	\$2,253,661	
W BRIDGE ST	Central business districts, shopping malls, supermarkets and strip retail	\$0	\$0	\$0	\$0	\$0	\$0	2	0		\$0	46	\$2,253,661	
N SWAIN ST	Central Business Districts, Shopping Malls, Supermarkets and Strip Retail	\$0	\$0	\$0	\$0	\$0	\$0	2	0		\$0	47	\$2,253,661	
MN 67 W BROADWAY ST	Churches and Places of Worship	\$0	\$12,000	\$0	\$0	\$0	\$0	2	0		\$12,000	48	\$2,265,661	
PROSPECT ST	Other	\$4,911	\$12,000	\$0	\$0	\$0	\$0	3	5		\$16,911	50	\$2,282,572	
MAIN ST	Other	\$5,078	\$0	\$0	\$0	\$0	\$0	3	5		\$5,078	51	\$2,287,650	
BAKER DR	Other	\$0	\$6,000	\$0	\$0	\$0	\$0	3	5		\$6,000	52	\$2,293,650	
E FLYNN ST	Other	\$22,802	\$0	\$0	\$0	\$0	\$0	3	4		\$22,802	53	\$2,316,452	
FRONT ST	Other	\$0	\$12,000	\$0	\$0	\$0	\$0	3	3		\$12,000	54	\$2,328,452	
CH 101 NORMANDALE RD	Other	\$0	\$6,000	\$0	\$0	\$0	\$0	3	2.5		\$6,000	55	\$2,334,452	
ACTIVEAID RD	Other	\$0	\$12,000	\$0	\$0	\$0	\$0	3	2.5		\$12,000	56	\$2,346,452	
E ELM ST	Other	\$5,499	\$0	\$0	\$0	\$0	\$0	3	2		\$5,499	57	\$2,351,951	
CENTER ST	Other	\$13,988	\$12,000	\$0	\$0	\$0	\$0	3	2		\$25,988	59	\$2,377,939	
PATTEN ST	Other	\$922	\$0	\$0	\$0	\$0	\$0	3	2		\$922	60	\$2,378,861	
ANDERSON DR	Other	\$0	\$12,000	\$0	\$0	\$0	\$0	3	1.875		\$12,000	61	\$2,390,861	
W CHESTNUT ST	Other	\$0	\$0	\$0	\$0	\$0	\$0	3	0		\$0	62	\$2,390,861	
W WYOMING ST	Other	\$0	\$12,000	\$0	\$0	\$0	\$0	3	0		\$12,000	63	\$2,402,861	
N DEKALB ST	Other	\$0	\$0	\$0	\$0	\$0	\$0	3	0		\$0	64	\$2,402,861	
W FLYNN ST	Other	\$0	\$6,000	\$0	\$0	\$0	\$0	3	0		\$6,000	65	\$2,408,861	
INDUSTRIAL DR	Other	\$0	\$0	\$0	\$0	\$0	\$0	3	0		\$0	66	\$2,408,861	
ACTIVEAID RD	Other	\$0	\$0	\$0	\$0	\$0	\$0	3	0		\$0	67	\$2,408,861	

Appendix C: City of Redwood Falls Planned  
Projects

## I. Planned Projects

The City of Redwood Falls is in the process of completing a street and utility capital improvement plan (CIP) document. At the time of writing this report, two major street and utility reconstruction projects are planned for the City of Redwood Falls. This appendix will be updated to reflect new projects as they emerge. When the City of Redwood Falls adopts its street and utility CIP, this appendix will be replaced in its entirety with the aforementioned CIP document.

### A. Drew Street Reconstruction – Tin Street to 2nd Street (2022)

This project would be the second phase of a long-running project, with the first phase being completed 2007. The second phase started in the Summer of 2021 and will reconstruct all of Drew Street south of 2nd Street. This project will replace the aging sanitary sewer system that runs underneath Drew Street with a larger diameter system, in addition to adjusting grade to meet the new flow line in 2<sup>nd</sup> Street. The project will also modernize water utilities, storm sewer, and includes the cost of a complete replacement of the curb-gutter, sidewalks, and street surface along the corridor.

The project was included in the proposed 2021 budget with an estimated cost of \$2.7M. Completion of the Drew Street reconstruction is scheduled for early Fall of 2022. Along the project corridor, the ADA Self-Evaluation identified 26 ped ramps in need of remediation (14 non-compliant pedestrian ramps, 12 missing ramps), 5352 linear ft of non-compliant sidewalk (about 26,760 sq. ft.), and no crosswalks in need of remediation. The cost to install missing pedestrian ramps and remediate existing pedestrian ramps was estimated at \$146,000. The cost of remediating non-compliant sidewalks along the project corridor was estimated at \$226,930. The total estimated cost of ADA remediation along the Drew Street reconstruction project corridor is \$372,930. While the cost savings of bundling these improvements with the Drew Street Reconstruction project would not be one-to-one, it would represent a great costs savings for the City of Redwood Falls.

### B. 4th Street Reconstruction – Gould Street to Mill Street (2023)

This project is currently in the pre-planning phase, and has an engineer's estimate \$4.7M to remove aging utilities along the corridor and install a new sanitary sewer system, storm sewer and watermain. A total street reconstruction is included in the estimated project cost. The ADA Self-Evaluation of the project corridor identified 33 ped ramps in need of remediation (12 non-compliant pedestrian ramps, 31 missing ramps), 6522 linear ft of non-compliant sidewalk (about 32,610 sq. ft.), and one missing crosswalk for remediation. Remediation costs for the ped ramps was estimated at \$188,000, remediation costs for the sidewalks were estimated at \$129,290, and remediation for the crosswalk was estimated at \$500. The total estimated cost of ADA remediation along the 4th Street reconstruction project corridor is \$317,340. Once again, it cannot be said that the cost savings of bundling ADA remediation with the 4<sup>th</sup> Street Reconstruction project will be exactly one-to-one, but it does offer the potential to address a great deal of non-compliant infrastructure already slated for reconstruction.

## Appendix D: Public Outreach Results

## Appendix E: Grievance Procedures

## City of Redwood Falls ADA Grievance Procedure

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

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

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

### A. Telephone

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

### B. Paper Submission

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

The City of Redwood Falls 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 Redwood Falls.

Accordingly, the resolution by the City of Redwood Falls 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](http://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 Redwood Falls shall maintain ADA grievance files on behalf of the city for a period of seven years.

**City of Redwood Falls, MN ADA Grievance Form**

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

Jim Doering  
Public Works Project Coordinator & ADA Coordinator  
333 S. Washington St.  
P.O. Box 526  
Redwood Falls, MN 56283

Or it can be e-mailed to the ADA Coordinator using the email address provided in **Appendix F**:

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.

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

Agency or Court: \_\_\_\_\_ Contact Person: \_\_\_\_\_

Address: \_\_\_\_\_ City, State, Zip Code: \_\_\_\_\_

Phone Number: \_\_\_\_\_ Date Filed: \_\_\_\_\_

## Appendix F: ADA Coordinator Contact Information

**City of Redwood Falls ADA Coordinator:**

Jim Doering, Public Works Project Coordinator

City of Redwood Falls

333 S. Washington Street, PO Box 526

Redwood Falls, MN 56283

Phone: 507-616-7400

Fax: 507-637-2417

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## Appendix G: ADA Design Standards and Procedures

## 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 <https://www.access-board.gov/files/prowag/PROW-SUP-SNPRM-2013.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.

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.accessboard.gov>) or at <https://www.access-board.gov/files/prowag/planning-and-design-for-alterations.pdf>.

### 4. Minnesota Department of Transportation

Building on the adoption of PROWAG as planning and design guidance for accessible pedestrian facilities, MnDOT has developed additional planning, design, and construction guidance that is available to local agencies. Listed below is information on additional design guidance available. This is not intended to be an exclusive or comprehensive list of ADA guidance, but rather an acknowledgement of guidance staff should consider and a starting point for information on providing accessible pedestrian facilities. The MnDOT Accessibility webpage, which has good information in a variety of subject areas related to ADA and accessibility, can be found at <http://www.dot.state.mn.us/ada/index.html>. The webpage also provides the ability to sign up for ADA policy and design training classes when available and to review material from previous trainings.

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

ADA Project Design Guide Memo:

<http://www.dot.state.mn.us/ada/pdf/adaprojectdesignguidememo.pdf>

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

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

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

MnDOT's 7000 series Standard Plates, which are approved standards drawings, provide information on standard details of construction and materials related to curbs, gutters, and sidewalks are on MnDOT's website at <http://standardplates.dot.state.mn.us/stdplate.aspx>. The MnDOT Road Design Manual serves as a uniform design guide for engineers and technicians working on MnDOT projects. The document is available to others as a technical resource. Chapter 11 – Special Designs, includes information on the design of pedestrian facilities. The Road Design Manual can be found at <http://roaddesign.dot.state.mn.us/roaddesign.aspx>

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

# Appendix H: Policy Review

# Redwood Falls Policy Review

## Redwood Falls City Code

The Redwood Falls City Code pertains to most obligations and duties of the city, and the policies and regulations governing the use of space within the city. It was closely reviewed for sections pertaining specifically to ADA or to accessibility issues such as construction, maintenance, and regulations that could affect accessible space. These code sections are detailed below, with sample/suggested text and discussions of why these sections or changes may be considered.

### Section 4.05 Demolition Permit Required

Discussion: [PROWAG Section R205](#) requires that when a pedestrian accessible route is temporarily closed, an alternate pedestrian accessible route be provided. Consider adding language to this section regarding the Building Official's discretion to require an alternate route, in compliance with ADA.

### Chapter 4: Construction Licensing, Permits and Regulation (generally)

It would be useful to have a provision somewhere in this chapter explaining something to the effect of: The Building Official may require as a condition of issuing a permit that the pedestrian accessible route be maintained during construction within or adjacent to the public right-of-way, that a temporary pedestrian route be established and maintained throughout construction, that an appropriately signed accessible route detour be established and maintained throughout construction, and that the public right-of-way be reconstructed upon completion of construction per ADA guidelines and to the satisfaction of the Building Official and the City Engineer.

Discussion: Language also exists in Chapter 7 to this effect, but adding the Chapter 4 language explicitly ties permits and regulations to compliance with ADA.

### Section 7.05 Removal of Ice and Snow from Public Sidewalks and Private Property

Consider adding Subd. 6. City to Assist with Removal of Snow and Ice from Curb Ramps (and appropriate language)

Discussion: Curb ramps are a common problem for snow removal. Public snow plowing activities cause the buildup of windrows (plowed snow rows) at the edges of streets, making curb ramps inaccessible. Clearing them can be difficult. Redwood Falls may wish to consider whether it wishes to include ordinance language that it will attempt to clear curb ramps in the winter where snow buildup has made the curb ramp impassable.

ADA calls for "reasonable snow-removal efforts" to be undertaken, acknowledging that snow and ice removal is a maintenance activity and that these may take time ([28 CFR §35.133](#)). Allowing impassable ramps to persist for weeks or months of the winter makes them

functionally useless for accessibility for long periods of time.

### Section 7.06 Construction and Reconstruction of Roadway Surfacing, Sidewalk, Curb and Gutter

Consider amending Subd. 3. Specifications and Standards to include this as final sentence: All construction and reconstruction activities shall comply with the Americans with Disabilities Act guidelines.

Discussion: Overtly express that ADA will be one of the specifications and standards for all construction/reconstruction in the public right-of-way.

### Section 7.07 Obstructions in Streets

Consider amending Subd. 1 Obstructions to include the following: In no circumstance will any obstruction be permitted to block the pedestrian accessible route as defined by the Americans with Disabilities Act.

Consider amending Subd 5. Signs and Other Structures to include the following: In no circumstance will any sign or other structure be permitted to block the pedestrian accessible route as defined by the Americans with Disabilities Act.

Consider adding Subd. 6. Trees and Vegetation and renumbering current subdivisions 6 and 7.

- Proposed text: In no circumstance shall a property owner to allow tree limbs and other vegetation to overhang and partially or fully obstruct the sidewalk/pedestrian accessible route, any street or other public property. Vegetation shall also not be allowed to obstruct reasonable visibility at street corners, as determined by the City Engineer.
- Discussion (PAR): Vegetation can significantly compromise the effective accessibility of a sidewalk. ADA (PROWAG) requires a minimum 4-foot wide pedestrian accessible route to be continuously maintained, with periodic 5-foot passing areas. This language can also express that it is the adjacent owner's responsibility to maintain vegetations so as to not block streets and sidewalks. Note that Section 7.11 pertains to grass, trees and weeds, as well.
- Discussion (Intersection visibility): Street corner visibility is a safety hazard for pedestrians, who are frequently not well seen by motorists. Maintaining visibility with properly maintained vegetation at intersections benefits all members of the traveling public.

### Section 7.11 Regulation of Grass, Trees and Weeds

Consider adding to Subd. 3 Duty of Property Owners to Cut Grass and Weeds and Maintain Trees and Shrubs. In no circumstance shall a property owners allow tree limbs, shrubs, grasses or other vegetation to overhang and partially or fully obstruct the sidewalk/pedestrian route, any street or public property. Vegetation above a sidewalk must be trimmed to a minimum

vertical clearance height of 80 inches above the sidewalk surface as to not obstruct the pedestrian accessible route.

Discussion: [ADAAG Sections 307.2](#) Protrusion Limits and [307.4](#) Vertical Clearance apply to the PAR and stipulate an 80" minimum vertical clearance above the finish ground above a pedestrian circulation path, and that objects with leading edges between 27 and 80 inches in length may not protrude more than 4 inches into the pedestrian circulation path.

#### Section 7.14 Limiting Speed and Timing of Railway-Street Crossing Obstruction

Amend text as follows: It is a misdemeanor for any person operating or in charge of a railroad train, car, engine, locomotive or other railroad equipment, or combination thereof, to so operate, park or leave the same standing upon the railroad at its intersection with a street, sidewalk, or multi-use trail so as to prevent unobstructed vehicular or pedestrian traffic on the street, sidewalk or trail for a period longer than five minutes, or to so operate it at a speed greater than 15 mph.

Discussion: Maintain Parity for pedestrians.

#### Section 7.16 Private Use of Public Streets and Parking Lots

Consider deleting from the first sentence: Upon an application duly made to the City Administrator, the Council may, in its discretion, grant special permission whereby on-street parking or the use of city-owned parking lots or ramps ~~or public sidewalks~~ may be temporarily or permanently prohibited or restricted for private reasons and purposes (including, but not limited to, establishment of private or "leased" parking, "loading zones" or benches) at such places, on such terms and for such consideration as the Council may deem just and equitable.

Discussion: This section does not permit the private use of the travelled way of a public street, and it should not permit the prohibition of access on a pedestrian accessible route.

Discussion: The private use of a city-owned parking lot or ramp may also remove the availability of public accessible parking, as required under ADA. The city may wish to add language to prevent this from occurring, or to mitigate with alternative and compliant public parking if ADA-accessible parking is removed temporarily or permanently.

#### 7.18 Motorized Vehicles Permitted on Sidewalks

Point of order only – the city may want to revisit this language, as there is a multiplicity of motorized vehicles now available to the public aside from a motorized wheelchair. This section also does not allow for motorized vehicles on a designated bicycle trail, though electric bicycles have become prevalent recently. MnDOT has changed its definition of motorized vehicles to respond to some of this. Note that some electric-assisted bicycles or other mobility devices may allow persons with mobility limitations to use a public trail that may otherwise not enjoy that opportunity.

The city may wish to review definitions in Section 8.22 (Recreational Vehicles) for motorized bicycle to ensure that this is up to date with modern electric bicycles. Also see Section 8.24 where a recreational motor vehicle (including motorized bicycle) is not allowed on a public sidewalk or walkway (Subd. 1) or publicly owned land (Subd. 2).

### 7.20 Sidewalk Maintenance and Repair

Revise Subd. Construction, Reconstruction and Repair Specifications. All construction, reconstruction or repair of sidewalks shall be done in strict accordance with specifications on file in the office of the City Administrator and in accordance with the Americans with Disabilities Act.

Discussion: Conformance with ADA for all new construction and repair.

### 7.23 Right-of-Way Management

Subd. 4 Permit Required (A. Application Fee for Permit). This section includes the materials required to accompany a permit. Consider adding (and renumbering requirements that follow):

- 8. The location and description of any temporary pedestrian access route to be provided during construction.
- Discussion: [PROWAG R205](#) requires that an alternative pedestrian access route be provided when a pedestrian circulation path is temporarily closed by construction, alterations, maintenance operations, or other conditions. If Redwood Falls plans to adopt PROWAG as its ADA standard by reference (this is recommended as this is the MnDOT standard), this permit requirements section should include this requirement to ensure that applicants are aware of this need and held to it during construction.

Subd. 4.D. Exceptions. Unclear why sidewalks, curb and gutter are exempted from these ROW permit requirements and from registration requirements in Subd. 4.C. Sidewalks are an integral part of the public ROW and essential for ADA accessibility. Consider including sidewalks, curb, and gutter in Subdivisions 4.C and 4.D.

Subd. 6 Standards During Construction or Installation. Consider adding the following requirement:

- V. Temporary pedestrian access routes as required by ADA.

Subd. 7 Repair and Restoration, Section B. General Standards. Consider adding:

- 6. Compliance of the restoration with all applicable ADA standards.

### 10.35 Weeds, Grass and Other Vegetation

Consider adding to Subd. 1 Unlawful Act. It is unlawful for any owner, as shown by the records in the office of the County Auditor, or the taxpayer of record as shown by the records of the

County Treasurer, of private or public premises, to maintain any weeds or grass growing thereon at a height of more than six inches or to permit such shrubbery or other vegetation to be overgrown or to obstruct or partially obstruct a street or sidewalk.

Discussion: Overgrown is undefined in the code, aside from the 6-inch requirement above. This is a common problem for sidewalks and also at intersections where vegetation is a safety hazard for all transportation users.

#### 10.43 Diseased Trees and Stumps

Subd. 2 Jurisdiction. Point of order. Does the city have control and maintenance responsibilities for trees/shrubs/plantings within the ROW such that adjacent land owners are not required to maintain these features? This is important for establishing responsibility. This may only be an assertion that the city has the right to act, as opposed to responsibility.

#### 11.15 Exterior Property Areas

Subd. 3 Sidewalks and Driveways. Consider Revising: All sidewalks, walkways, stairs, driveways, parking spaces and similar areas shall be kept in a proper state of repair, and maintained free from hazardous conditions. Sidewalks within the public right-of-way shall comply with the Americans with Disabilities Act or be brought into compliance when reconstructed.

Discussion: Restates requirements for sidewalks within the property maintenance code.

Subd. 4 Weeds. Consider Revising: All premises and public or private exterior property shall be maintained free from weeds or plant growth in excess of six inches. All noxious weeds shall be prohibited. Weeds shall be defined as all grasses, annual plants and vegetation, other than trees or shrubs provided; however, this term shall not include cultivated flowers and gardens. No trees, shrubs or other vegetation shall be allowed to overhang so as to obstruct or partially obstruct a street or sidewalk, or obscure clear views at an intersection.

Discussion: Restates needs for clear path within property maintenance code.

### Subdivision Regulations (Unified Development Ordinance)

Generally, the subdivision regulations should be amended to include definitions for sidewalk, curb ramp, ADA, pedestrian accessible route, and other ADA-related terms, in addition to including amendments to the Unified Development Ordinance to ensure that future development within Redwood Falls meets the requirements set by the ADA and PROWAG.

#### Section 5.03 - Site Plan Requirements - (B) Required Information

Running and cross slope are key elements of assessing ADA compliance for sidewalks and curb ramps. This will allow intervention at the site plan review stage to ensure compliance.

Consider revising Section 5.03 Subd. B to include the following:

- (5) The location and dimensions (including running slopes and cross slopes) of existing

and proposed curb cuts, aisles, off-street parking and loading spaces, and sidewalks.

### Section 5.07 - Site Layout Guidelines

The Unified Development Ordinance does not require sidewalks within the site layout guidelines and subdivision guidelines. Including these requirements would contribute to a network of connected and accessible pedestrian features. Some funding resources, such as Minnesota's state Safe Routes to Schools program, requires that sidewalks be required with new development to be eligible for grant funding.

Consider amending the Unified Development Ordinance to include a Pedestrian Access section.

### Section 5.08 - Vehicular Access and Circulation

This section is specific to vehicular access, but the confluence of vehicular access and ADA access should be addressed. For instance – meeting ADA requirements for pedestrian accessible route width, cross slope and running slope, directness of route from the public right-of-way to building entrances, compliant sidewalks connecting to parking spaces and similar issues.

Consider including a section within 5.08 or as a separate section address the minimum requirements or principles for pedestrian access to a site.

### Section 5.15 - Installation and Maintenance of Required Landscaping and Buffering Methods

For the sake of maintaining ideological consistency with City of Redwood Falls Code of Ordinances, the Unified Development Ordinance should restate the importance of maintaining vegetation such that sidewalks remain free and clear of obstructions.

- Consider amending Section 5.15 - (C) Maintenance and Care to include the following: The landowner shall be responsible for the continued maintenance of landscape materials to remain in compliance with all requirements of this chapter. Plant material that exhibits evidence of insect pests, disease, or damage shall be appropriately treated and dead plants promptly removed and replaced within the next planting season. Trees, shrubs and other vegetation may not be permitted to overhang or obstruct a public sidewalk in a way that poses a danger, restricts access, or otherwise contradicts that standards of the Americans with Disabilities Act.

### Section 10.14 - Sandwich Board Signs

PROWAG requires a minimum 5-foot clear zone. Sandwich boards are sometimes placed on sidewalks and obstruct the pedestrian access route.

Consider amending section *10.14.A - Sandwich Board Signs Within the Central Business District* to include the following:

- (6) All signs shall be positioned in such a way as to not obstruct a sidewalk and maintain a minimum 5-foot wide clear zone along a sidewalk.

Consider amending section *10.14.B - Sandwich Board Signs Within all Other Nonresidential Districts* to include the following:

- (8) All signs shall be positioned in such a way as to not obstruct a sidewalk and maintain a minimum 5-foot wide clear zone along a sidewalk.

### Section 10.15 - Canopies, Marquees and Fixed Awnings

ADA guidance requires that a minimum 5-foot clear pedestrian accessible route be maintained at all times. The supports for canopies and similar objects must not block this route. [PROWAG 402.3](#) specifies that the lower edge of a post-mounted object should be a minimum of 2 meters (6.7 feet) above the finish surface.

Consider amending *Section 10.15 - Canopies, Marquees and Fixed Awnings* to include the following:

- (B) Awnings, canopies or marquees may have no part of the structure other than supports nearer the ground surface than seven feet. No part of the structure shall block a sidewalk.

### Section 10.20 - Wall Signs

ADA and [PROWAG 402.2](#) guidance specifies the acceptable amount that leading edges of objects may protrude into pedestrian circulation paths. This is to ensure that a wall-mounted object above the finished surface does not block the path.

Consider amending Section 10.20 – Wall Signs to include the following:

- (B) Wall signs attached to and projecting from the exterior walls of buildings shall not extend beyond 18 inches of the wall surface and shall not cover more than 15% of that business's wall. A wall sign shall not protrude more than 4 inches horizontally into a pedestrian circulation path.

### Section 15.14 - Required Findings

For the sake of maintaining ideological consistency with City of Redwood Falls Code of Ordinances, the Unified Development Ordinance should use this opportunity to set a standard of ADA compliance and have a conversation with developers about appropriate accommodation.

Consider amending *Section 15.14 – Required Findings* to include the following:

- (I) The planned unit development is in compliance with the intent and purpose of the Americans with Disabilities Act.

### Section 15.17 (C) - Development Plan Submittal Requirements, Site plan information and contents

Another opportunity to review ADA-compliance, but dimensioning must be included (i.e., width, running slope, cross slope, and other pertinent dimensions).

Consider amending *Section 15.17 (C) - Development Plan Submittal Requirements, Site plan information and contents* to include the following:

- (15) Locations, slopes, and widths of proposed alleys and pedestrian ways, including pedestrian curb ramps.

### Section 16.07 - Subdivision Regulations, Findings Required for Minor Subdivision Approval

Additional opportunity to determine ADA-compliance and have a conversation with developers about appropriate accommodation.

Consider amending *Section 16.07 – Subdivision Regulations, Findings Required for Minor Subdivision Approval* to include the following:

- (G) The subdivision is in compliance with the intent and purpose of the Americans with Disabilities Act.

### Section 16.13 - Subdivision Regulations, Required Findings for a Preliminary Plat

Additional opportunity to determine compliance and have a conversation with developers about appropriate accommodation.

Consider amending *Section 16.13 - Subdivision Regulations, Required Findings for a Preliminary Plat* to include the following:

- (6) The proposed preliminary plat is in compliance with the intent and purpose of the Americans with Disabilities Act.

### Section 16.15 - Sketch Plan Required (Preliminary Plat)

Additional Opportunity to determine ADA-compliance and have a conversation with developers about appropriate accommodation.

Consider amending *Section 16.15 - Sketch Plan Required (Preliminary Plat)* to include the following:

- (4) Street layout on and adjacent to plat, including pedestrian ways, widths, and slopes.

### Section 16.16 (B) - Submittal Requirements for Preliminary Plat, Required information and contents

Additional opportunity point to review ADA-compliance, but dimensioning must be included (i.e., width, running slope, cross slope, and other pertinent dimensions).

Consider amending *Section 16.16 (B) - Submittal Requirements for Preliminary Plat, Required information and contents* to include the following:

- (14) Locations, slopes, and widths of proposed alleys and pedestrian ways, including pedestrian curb ramps.

#### Section 16.21 - Final Plats, Required Findings for Final Plat

If the goal is to have 100 percent ADA compliance within the City of Redwood Falls, MN there should be procedural checks. This would create a method to confirm that the final platting plan is ADA compliant.

Consider amending *Section 16.21 - Final Plats, Required Findings for Final Plat* to include the following:

- (4) The final plat is in compliance with the intent and purpose of the Americans with Disabilities Act.

#### Section 16.24 - Premature Subdivision Described

Continuing from the above recommendations, the City of Redwood Falls should have the ability to reject a subdivision if it has not provided accessible features throughout.

Consider amending *Section 16.24 - Premature Subdivision Described* to include the following:

- (F) Not compliant with Americans with Disabilities Act Standards. The proposed subdivision is inconsistent with the guidelines, intent and purpose of the Americans with Disabilities Act.

## Section 16.28 - Design Standards, Streets and Alleys

For ideological consistency, the Unified Subdivision Ordinance should explicitly identify ADA as governing authority and specify the inclusion of ADA-compliant curb ramps along with sidewalks and pathways.

Consider amending *Section 16.28 - Design Standards, Streets and Alleys* to include the following:

- (H) *Sidewalks*. In cases where the City deems it appropriate, sidewalks of not less than five (5) feet in width shall be provided. Where sidewalks are provided provisions shall be made for handicapped access. At street intersections, sidewalks shall have accessible pedestrian curb ramps. Sidewalks and curb ramps must meet the design standards of the Americans with Disabilities Act.

## Section 16.36 - Design Standards, Street Improvements

For consistency, the Unified Subdivision Ordinance should identify ADA as the governing authority and specify the inclusion of ADA-compliant curb ramps along with sidewalks and pathways.

Consider amending *Section 16.36 - Design Standards, Street Improvements* to include the following:

- (H) Driveway approaches and/or sidewalks of standard design or pedestrian pathways and pedestrian curb ramps as may be required by the Council shall be installed. Sidewalks and pathways shall meet the requirements of the Americans with Disabilities Act.

# Redwood Falls 2035 Comprehensive Plan (2017)

## Chapter 4 – Infrastructure

This chapter provides a broad level summary of issues within the Redwood Falls sanitary sewer, stormwater, and water systems. Part of this chapter addresses the long term need to modernize the current systems, and increase resiliency towards growing demand on the system, as well charting the city's progress on replacing and installing new utilities. The chapter ends with four goals and strategies for the ongoing efforts with infrastructure maintenance and improvements.

Policy Understanding and Recommended Revision:

### Infrastructure Goals and Strategies

- Goal #1: Continue with program of regular infrastructure rehabilitation and reconstruction

- Amend to include a specific effort to coordinate effort for storm drainage, wastewater, water distribution, and pavement condition improvement projects and overarching goal of ADA-compliance.

## Chapter 5 – Transportation

This chapter provides immediate goals and policies for promoting and expanding opportunities for safe pedestrian and bicycle traffic. It also calls for the integration of pedestrian facilities into the design of roadway facilities throughout the community. The chapter ends with six goals and strategies for city routes, which provides a broad summary of the community’s vision for 2035.

### Policy Understanding and Recommended Revision:

#### Goals and Strategies for City Routes

- Goal #6: Expand Pedestrian and Bicycle Mobility
- Amend to include a mandate for compliant design of pedestrian facilities based on best practices outlined in the Public Rights-of Way Accessibility Guidelines (PROWAG) as part of the overall goals for pedestrian and bicycle mobility.

## Chapter 8 – Community Facilities and Downtown District

This chapter provides a summary of concerns for the Downtown District and community facilities in Redwood Falls. The chief concern for Downtown Redwood Falls seems to fall into issues arising from parking and vehicle accessibility from Highways 19 and 71. The community facilities section covers some ADA-accessibility needs, but it is not comprehensive and does not stand a replacement for a complete ADA-compliance assessment of Redwood Falls municipal buildings.

### Policy Understanding and Recommended Revision:

Future comprehensive plans should also include both an assessment of downtown sidewalk gaps and ADA compliance for downtown parking lots. Adequate parking is meaningless if people cannot safely and reliably reach their destinations, or if the parking supply does not accommodate those who require accessible parking spaces.

#### Community Facilities:

- Goal #1: Continue to enhance existing community facilities to keep them updated and current
- Expand to include an additional subgoal that any municipal building expansions should include an assessment of current accessibility and will adhere to ADA-compliance standards as set by the U.S. Access Board.

#### Downtown District:

- Goal #2: Work with appropriate agencies and businesses to rehabilitate the existing CBD buildings and infrastructure
  - Subgoal #1: “Provide adequate infrastructure, including sewer, water, storm

sewer, and sidewalks to the existing buildings or new buildings for new redevelopment in the Downtown area”

- Expand to include an explicit goal of meeting ADA-compliance standards as set by the U.S. Access Board.
- Goal #2: Continue to provide adequate and convenient parking in the Downtown District
- Expand to include an additional subgoal to assess that downtown parking supply meets the minimum threshold of accessible parking as set by U.S. Access Board standards.

#### Chapter 10 – Parks and Recreation

This chapter of the Redwood Falls comprehensive plan provides immediate and long-term goals for the Redwood Falls park system. Parks cover 268 acres, or around 8 percent of the city. The city has long term plans to implement new parks in addition to a network of off-street connections between parks for non-motorized uses.

#### Policy Understanding and Recommended Revision:

The goals for the City of Redwood Falls park system should be amended to include explicit goals for meeting ADA-compliance as set out by the U.S. Access Board. Parks and public green space should be accessible to all peoples, regardless of ability and ableness.

#### Goals and Strategies for Redwood Falls Parks and Recreation:

- Goal #1: Plan for a sustainable park system and ensure proper maintenance and vibrancy of park and recreation facilities
- Include an additional subgoal that new park developments, capital improvements, and park resources meet accessibility guidelines as set by the U.S. Access Board.