

# ADA

## Transition Plan

### Abstract

To enhance accessibility for everyone who lives, works, plays, and does business with the City of Saint Paul. This plan will outline how the city will prioritize investments in infrastructure and accessibility upgrades to improve access for all.



2026

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# Introduction

## Americans with Disabilities Act (ADA) Background and Transition Plan

### 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:

- I. Employment
- II. State and local government services
- III. Public accommodations
- IV. Telecommunications
- V. Miscellaneous Provisions

As a provider of public services and programs, the City of Saint Paul (City) must comply with Title II of the ADA by conducting a self-evaluation of its facilities and developing a transition plan to achieve compliance.

***“...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.”***

- Title II, ADA (1990)  
[42 USC. Sec. 12132; 28 CFR. Sec. 35.130](#)

This Public Works ADA Transition Plan (Plan) outlines policies and procedures for:

- The City to maintain ADA compliance in the public rights of way
- Community members to have a dialogue about accessibility issues they experience navigating public infrastructure within the City of Saint Paul.

The Plan provides a better understanding of the assets within Saint Paul and will help guide the City’s prioritization of ADA investment.

Additionally, progress on the Plan will ensure that the City maintains eligibility for State and Federal funding to support transportation projects. Improvements to infrastructure benefit all residents and visitors to the City, making the City a safer place to walk or roll. The City seeks to improve accessibility across all neighborhoods, and prioritizes early investment in those locations with the greatest need, as demonstrated by the existing condition of facilities and each neighborhood’s reliance on those facilities.

### Related Laws and Regulations

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. In addition to those companion legislations, the Public Right-Of-Way Accessibility Guidelines (PROWAG) provides critical design guidance for implementing ADA compliant infrastructure. All three laws and regulations are discussed below.

#### Architectural Barriers Act of 1968

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.

[Architectural Barriers Act](#)

#### Section 504 of the Rehabilitation Act of 1973

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.

[Section 504, Rehabilitation Act of 1973 | U.S. Department of Labor](#)

#### Public Right-Of-Way Accessibility Guidelines (PROWAG)

The first draft of the Public Right-of-Way Accessibility Guidelines (PROWAG) was published by the U.S. Access Board in 2005, and the latest version was adopted by the United States Department of Transportation (DOT) in 2024. These guidelines govern the minimum requirements necessary for accessibility to sidewalks, streets, crosswalks, curb ramps, pedestrian signals, on-street parking, and other components of public right-of-way.

<https://www.access-board.gov/prowag/>

### ADA Requirements for the City of Saint Paul

Under Title II, Saint Paul 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 in 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 ([28 C.F.R. Sec. 35.160\(a\)](#)).
- Must designate at least one responsible employee to coordinate ADA compliance ([28 CFR 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.
- 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 CFR 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.
- Must establish a grievance procedure. Public entities must adopt and publish grievance procedures providing for prompt and equitable resolution of complaints ([28 CFR 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.

### Relationship to Other City of Saint Paul ADA Transition Plans

The City of Saint Paul has multiple ADA Transition Plans, with each City Department leading its own Plan. This document has been created to specifically cover accessibility of facilities within the public rights of way (public sidewalks and curb ramps) and does not include information on the City of Saint Paul programs, practices, or building facilities not related to public rights of way. Visit the website below for more information on departments other than Public Works:

[City of Saint Paul Departmental ADA Transition Plans | Saint Paul Minnesota](#)

### Collaboration with Other Government Agencies

Several other agencies are responsible for pedestrian facilities, such as bus stops, traffic signals, pedestrian curb ramps, and sidewalks and trails within the jurisdiction of the City. The City will coordinate with those agencies to track and assist in the elimination of accessibility barriers along their routes. Additionally, this Plan supports the goals of other adopted documents that affect public ROW within the City, which includes specific cooperative agreements with MnDOT and Ramsey County. ADA contacts and interagency agreements will be provided for City, County, and regional authorities that are responsible for right-of-way in the City of Saint Paul.

External Agency Plans may be found at the following links or made available by the City's ADA Coordinator:

- [MnDOT ADA Transition Plan](#)
- [Metro Transit Accessibility](#)
- [Metropolitan Council – ADA and Accessibility](#)
- [Ramsey County ADA Transition Plan, 2025](#)

## Grievance Procedure

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

To monitor the progress of compliance, the City, in accordance with 28 CFR 35.107(b), has established a grievance procedure for the prompt and equitable resolution of comments, concerns, or questions from the citizens of the City. The ADA grievance form is available online ([Grievance Form: American with Disabilities Act \(ADA\)](#)) and at City Hall and can be returned to the ADA Coordinator. It may be used by anyone wishing to file a complaint, comment, or concern regarding discrimination based on disability. A sample of the Grievance Form can be found in Appendix G.

## ADA Coordinator

The City has identified coordinators to oversee ADA policies and procedures and serve as the primary points of contact for ADA related issues. The ADA Coordinators will be staff from Department of Human Rights & Equal Economic Opportunity (HREEO). In Saint Paul that is the role of the Accessibility Coordinator. Contact info is located in Appendix A.

## Public Comments for Plan Development

The City is required to make this Plan available for Public Comment. It is posted on the Department of Public Works website (at the following link) and sent to specific community organizations. All comments received will be added to the Plan document.

<https://www.stpaul.gov/departments/human-rights-equal-economic-opportunity/accessibility/city-saint-paul-departmental-13>

## Plan Process and Timeline

The City completed the major Plan activities throughout 2024 and 2025. The first round of Public Outreach and Engagement took place in the summer and fall of 2024, while Policy Review and the Self-Evaluation began in 2024. The Self-Evaluation continued throughout 2025, with Data Analysis following data collection. Follow-up Public Outreach and Engagement occurred in 2025. The Plan was first drafted in 2025 and refined in early 2026. A draft Plan was made available for public comment in Spring, 2026. An outline of project processes and schedule is shown in Figure 1.

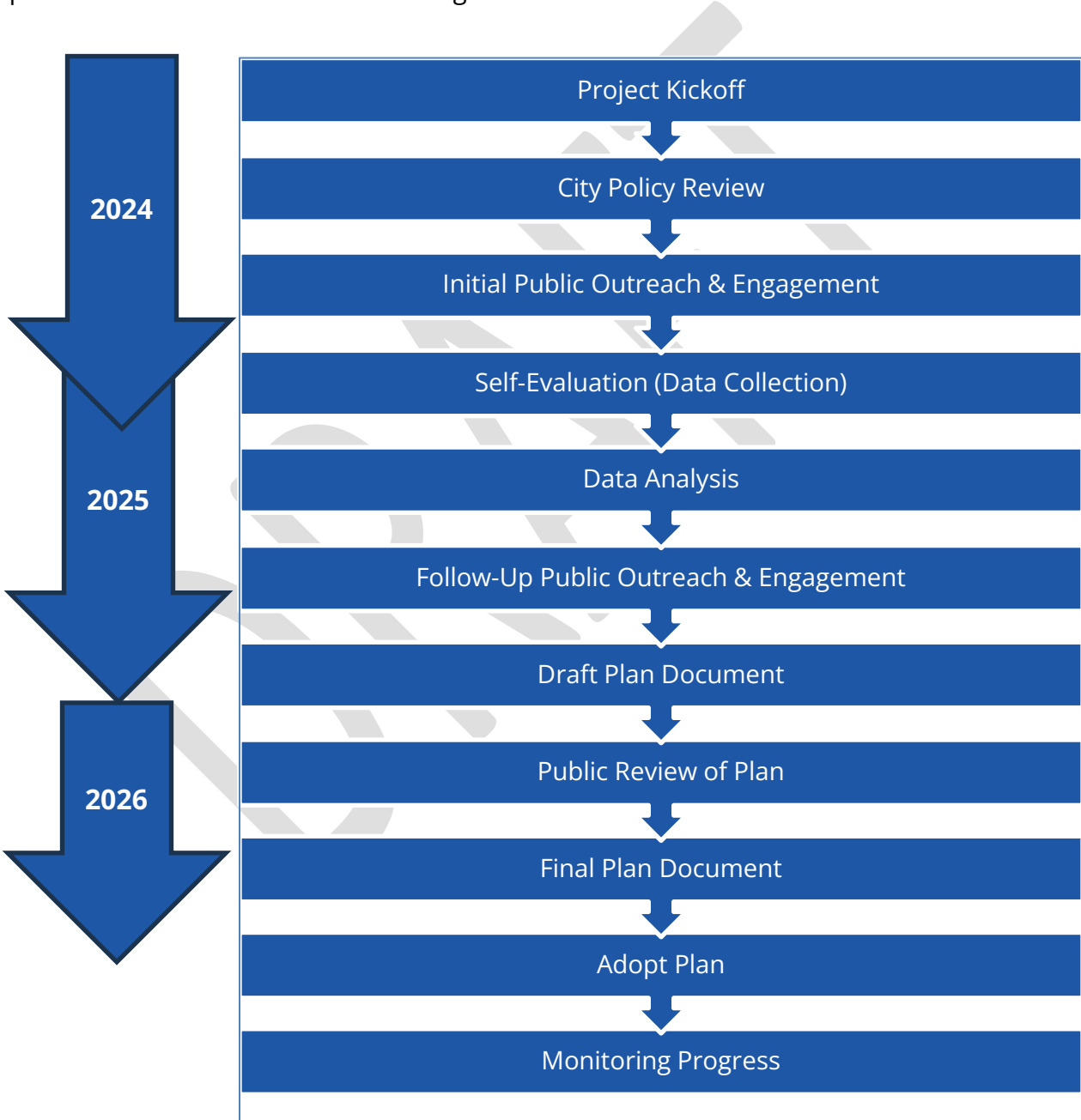


Figure 1: ADA Transition Plan Process

# Public Outreach and Engagement

The City of Saint Paul recognizes that public participation is an important component in understanding accessibility priorities and developing this document. The Plan was broadcasted throughout the city, especially targeting under-represented communities, to collect feedback and raise awareness of its effort. Input from the community was gathered and used to help define priority areas for infrastructure improvements and changes to make to policies and programs in the City of Saint Paul.

## Events and Participants

Public outreach for the creation of this document consisted of the following activities and occurred between June and October of 2024:

- 5 Community events and pop ups
- 290+ Online survey responses
- 7 Presentations to District Councils and City Committees
- 26 Public open house participants
- 43 community focus group participants

**650+ community members and stakeholders shared feedback**

Community focus groups and District Council meetings were selected through a process of determining historically under-represented voices within the City.

## How Trends in Sidewalk Complaints Informed Engagement

The City developed an equitable engagement indicator to understand both where and by whom ADA complaints are being reported. Accessibility challenges are largely identified through the City's sidewalk complaint process, so the project team reviewed official ADA complaint data (from 2022-2024) to identify gaps in reporting. Demographic information (Census data on race and ethnicity, disability status, household language status, and areas of poverty and affluence) was then used to determine communities who most depend on walking and rolling.

The complaint data and demographic information were aggregated by District Council boundaries and the differences framed around the City's previously-identified High Priority Areas for Walking Investment in the City's Pedestrian Plan (adopted in 2019). In general, the following trends emerged:

- District Councils with high diversity and poverty have fewer overall ADA complaints but more in key pedestrian areas.
- Districts with lower diversity have more complaints in lower priority areas.
- Lower diversity districts have a higher total number of complaints.

- The most diverse districts with many people reporting disabilities have more complaints in key areas but fewer per person.

This information was used to prioritize districts with fewer complaints per capita in high priority areas for targeted engagement efforts. The communities requiring targeted engagement were Frogtown, North End, Payne/Phalen, West Side Community Organization, and the Capitol River District.

Information of the Plan was broadcasted to all District Councils. District Councils not targeted for engagement were provided the same level of engagement once they inquired about the Plan. Those District Councils are Highland Park, and Macalester-Groveland.

## What We Heard

### Prioritization Activity

To understand where accessibility investments were ranked for community members, participants at in-person engagement events were asked to complete a marble prioritization exercise. Using marbles, each participant was asked to “spend” marbles in areas they prioritized. The top priorities for investments are areas that are out of compliance or dangerous and highly populated residential neighborhoods. See Figure 2 under “Prioritization,” below.

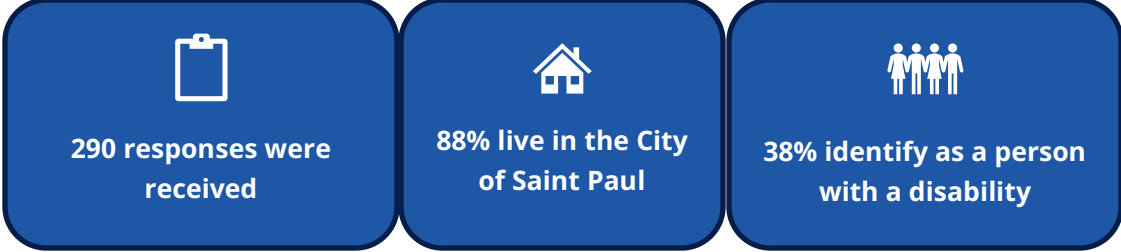
### In-Person Events

At in-person engagement events, the City heard the following key themes and considerations:

- Winter maintenance like snow clearing is critical for sidewalk accessibility.
- Navigating construction that impacts the street or sidewalks is very difficult due to obstructions.
- Most residents shared experiences with cars not stopping or yielding for people in crosswalks.
- Parked scooters and shared bikes are a significant issue when navigating the sidewalk.
- Widespread support for system-wide improvements for people with disabilities
- Uneven or broken sidewalks prevent residents using mobility devices from being able to move freely.
- Consider the needs of multiple types of disabilities when evaluating accessibility.
- The ADA Transition Plan should consider best practices, not just legal compliance.

### Online Survey

The survey focused on understanding people’s experiences navigating the city, perceptions about the quality of the public realm and amenities offered, and aspirations for future accessibility improvements.



Out of the 290 responses, the top five major key themes included:

- **Snow and Ice Removal** - Numerous responses highlight the challenge of navigating sidewalks, bus stops, and curb ramps due to poor or inconsistent snow and ice removal in winter.
- **Accessible Business** - Responses shared that businesses lack automatic doors or wide enough entrances to accommodate mobility devices, making it difficult for people to enter independently.
- **Sidewalk Maintenance and Design** - Broken, uneven, or missing sidewalks are significant barriers to accessibility and connectivity, with respondents unable to safely walk in their neighborhoods or access facilities.
- **Parking Accessibility** - Removal of parking meters and inadequate accessible parking spaces make it harder for people with disabilities to access downtown and other public areas across the city.
- **Traffic Calming** - Dangerous intersections, short crossing signals, and insufficient pedestrian-friendly infrastructure (audible signals, push buttons, crosswalks, refuge islands) are commonly mentioned as risks for people with mobility challenges.

By including the public in the Plan process, the City sought feedback on what makes navigation within the City difficult for people with disabilities. In particular, the City was interested in prioritizing infrastructure and policy improvements. As a result of the perspective shared through the survey and during engagement events, the City weighted Prioritization scoring to reflect voting results and common sentiments. See the Plan section on Prioritization for more information. Other feedback was related to City policies related to snow clearing, accessible parking, and other maintenance aspects. The Plan includes recommendations to improve policies.

## Self-Evaluation

The self-evaluation is the core data-driven activity in developing the Plan. The self-evaluation examines the condition of the City's Pedestrian Accessibility Routes (PAR) or Pedestrian Circulation Route (PCR) and identifies potential need for PAR/PCR infrastructure improvements. The self-evaluation inventories barriers in programs and activities that prevent persons with disabilities from reasonable access. This plan document pertains specifically to sidewalks and curb ramps in the public right-of-way under the purview of the City of Saint Paul's Public Works Department.

The self-evaluation provides an inventory of ADA compliance gaps and allows the City to catalog and prioritize future improvements. Facilities have been inventoried in an interactive, dynamic geographic database and delivered to the City for continuous monitoring and updates.

### The Evaluation Process

The City began its evaluation of pedestrian curb ramps and sidewalks in Fall of 2024, and continued through the 2025 construction season. Inventory of traffic signal systems was reviewed but not evaluated due to replacement schedule being led by other initiatives. Approximately half of the signal systems in the City incorporates accessible pedestrian design. The Plan does not evaluate parking requirement but did review parking policies and practices. Other infrastructure (such as public buildings, parks, and other places of public service) will be incorporated into stand-alone documents or in future updates to this one. The City's Consultant worked with City staff to provide professional services in completing this process. The self-evaluation consists of a field review of infrastructure and facilities (curb ramps and sidewalks) alongside a review of policies and programs.

Based on the size of the City and the large number of sidewalks and curb ramps, only a portion of the facilities were evaluated under the scope of the current evaluation. The City intends to collect additional facility compliance data in the years following this Plan development, moving toward a fully updated data set. The City has a Geographic Information Systems (GIS) database to represent all sidewalks and curb ramps within the City, and this evaluation established which data shall be collected to determine compliance with accessibility requirements. Compliance data amends the existing data for each segment of sidewalk (line) and curb ramp (point). Further, the data can be updated at any point in time so that improvements can be recorded.

Due to the variability of improvements made and their locations, the Plan focused on the original construction year which neighborhood sidewalks were installed in totality in accordance to the street reconstruction program. Each of the City's 93 neighborhoods has a year assigned, corresponding to the last (or next) major construction improvements. The project team filtered the neighborhood years to identify locations with less predictable compliance. To focus early evaluation efforts, the following assumptions were made regarding the compliance of existing facilities:

- Neighborhoods constructed **prior to 2012** would be most likely be non-compliant (based on industry improvements after 2012, updated ADA standards, and more than 10 years of freeze-thaw cycles deteriorating pavement).
- Neighborhoods constructed **after 2020 or scheduled to be constructed before 2030** will be almost completely compliant (based on recent industry improvements, limited facility degradation, and likelihood to be improved in the near future).
- Neighborhoods constructed between 2012 and 2020 would feature a mix of compliant and non-compliant facilities.

All sidewalks and curb ramps within the 2012-2020 neighborhoods were evaluated. By collecting data in these specific neighborhoods, the City has a realistic representation of the percentage of non-compliant facilities in each neighborhood. As more data gets collected across the full extent of the city, the compliance data will be refined. Until then, targeting this range of construction years provides the City with the most efficient start to assist in planning facility improvements.

The City also collected a sample (8-12 segments) of sidewalk compliance data from all other neighborhoods. Curb ramps were not sampled, as initial data indicated more than 90% non-compliance of curb ramps in the 2012-2020 construction years. Non-compliance for curb ramps is definitive compared to sidewalks, which are less predictable and require further evaluation. The sample size was purely dependent on available project budget.

## Summary

The City evaluated over 1400 curb ramps across 12 construction neighborhoods (updated between 2012 and 2020). To be designated “compliant,” a curb ramp must meet standard requirements for all 12 metrics related to dimensions, slopes, detectable warnings, and ramp condition. 7.0% (101 of 1400) of those ramps were found to be compliant. Another 13.5% of curb ramps were found to be non-compliant by only one metric. 67% were non-compliant by multiple metrics. Approximately 12.5% of the curb ramp locations lacked a curb cut entirely, leading to non-compliance in every metric.

The City evaluated over 1800 sidewalk segments, of which nearly 1100 are in the same construction neighborhoods updated between 2012 and 2020. The remaining sidewalk segments came from a sampling of every other construction neighborhood. To be designated “compliant,” a sidewalk segment must meet standard requirements for all 6 metrics related to width, surface condition, and slopes. The average sidewalk segment is one block in length, and a single non-compliant slope or discontinuity (gap or change in level such as a fault, heave, or lip) marks the entire segment non-compliant. A total of 27 sidewalk segments (1.4%) were found to be compliant.

It’s important to note that full compliance of the entire network is not realistic due to all public infrastructure having a service life and external factors forcing a sidewalk or pedestrian ramp to shift. The full set of data, organized by construction neighborhood, is summarized in Appendix B. The raw data is not shown in the Transition Plan or the Appendix,

but owned and maintained by the Public Works Department for ongoing updates. The City was found to have the following rates of compliance from all evaluated infrastructure:

#### **Curb Ramps – 7.00% compliant**

- More than 60% of curb ramps evaluated featured non-compliant grade breaks (there must be a flush connection between two different surface slopes in the PAR), and more than 50% featured non-compliant landing slopes and flare slopes. **Most ramps lack smooth pavement or comfortable resting areas.**

#### **Sidewalks – 1.44% compliant**

- Discontinuities: 94% of sidewalks evaluated featured at least one discontinuity greater than one-half inch, with 45% of all sidewalks featuring more than 5 discontinuities. **Discontinuities (gaps or tripping hazards) are extremely prevalent.**
- Major discontinuities: 43% of sidewalks featured at least one vertical change in level of at least 3 inches, and 13% of sidewalks featured more than 5 of these large changes in level. **Many of the observed discontinuities are severe.**
- Cross slopes: 88% of sidewalks evaluated featured non-compliant cross slope in at least one location, with 43% of sidewalks featuring more than 5 locations of excessive cross slope. **Sidewalks are frequently too steep from side to side, and many areas are severely sloped.**

The City went beyond a simple “yes” or “no” compliance determination and developed a scoring system to differentiate between facilities that were marginally non-compliant and those that were egregiously non-compliant. See Table 1 in the Prioritization Section for Infrastructure Compliance Scores by Neighborhood.

### **Field Guide for Data Collection**

The City’s GIS database was updated to include fields for determining accessibility compliance according to the latest Public Rights of Way Accessibility Guidelines (PROWAG). The evaluation criteria can be referenced in Appendix C. The published PROWAG requirements can be viewed by visiting the United States Access Board’s website: <https://www.access-board.gov/prowag/>.

## Policies and Practices

Part of Title II requires the City to evaluate inequity in programs and information. The City reviewed the following documentation of existing policies and procedures to improve accessibility. Some of these policies address concerns heard during engagement. Other policies help achieve ADA compliance through maintenance or construction. Each policy and plan was summarized with a short recommendation with potential recommendations for future consideration. Recommendations are located in Appendix E.

- City of Saint Paul Sidewalk Infill Policy
- City of Saint Paul Sidewalk Café Site Plan Standards
- City of Saint Paul and MnDOT Routine Maintenance Agreement
- City of Saint Paul and Ramsey County Joint Powers Agreement
- City of Paul and Lime and Spin Scooter Bike Sharing Agreement
- City of Saint Paul Policy Placement, Maintenance, and Removal of Storage Containers in the Public Right-of-Way
- City of Saint Paul Policy on Temporary Traffic Control Device Removal
- City of Saint Paul Complete Streets Action Plan
- City of Saint Paul Practice for Accessible Parking Spaces
- Code of Ordinances of the City of Saint Paul: Snow and Ice on Sidewalks
- Code of Ordinances of the City of Saint Paul: Shared Transportation Systems
- Code of Ordinances of the City of Saint Paul: Driveway, Sidewalk, Curb or Surfacing of Boulevards
- City of Saint Paul Comprehensive Plan: Transportation Chapter
- City of Saint Paul Pedestrian Plan
- City of Saint Paul Street Design Manual
- City of Saint Paul Transportation Safety Action Plan

Out of the 15 policies reviewed, two did not mention ADA-related concepts, a Transition Plan or vulnerable populations. It is recommended that the City review these particular policies to identify any gaps and opportunities to include the results of the Plan and the City's priorities in a future update. Further, any future update of the existing 15 policies or new policies for the City may consider incorporation of the prioritization and results. See Appendix E for additional information.

## Snow Clearing

A common concern raised both before and during this Plan is the challenge of navigating uncleared sidewalks. Per Chapters 113 and 114, the adjacent property owner is responsible for clearing sidewalks within 24 hours after a snow event ends. City of Saint Paul is responsible for clearing sidewalks on city-owned properties and at pedestrian space. Residents can report uncleared sidewalks through the city's webpage at <https://www.stpaul.gov/departments/public-works/snow/sidewalk-snow-shoveling> or by calling the Department of Safety and Inspection at 651-266-8989. The website is also a helpful resource for finding additional information about snow clearing requirements and assistance.

The City recognizes that snow and ice accumulation can significantly impede accessibility, particularly at curb ramps and sidewalk crossings, and acknowledges the need to strengthen its approach to winter maintenance. To address this, the City will prioritize ensuring that curb ramps, crosswalks, and pedestrian routes remain passable following plowing operations. This includes enhancing coordination with public works staff and contractors to ensure snow clearing routes and practices reflect updated accessibility priorities. The City will also conduct targeted public outreach—especially to corner lot property owners—to clearly communicate their responsibilities for clearing sidewalks and curb ramps adjacent to their properties. In addition, the City will review and, where necessary, update existing ordinances, enforcement mechanisms, and operational procedures to better support timely and effective snow removal, with the goal of maintaining safe, continuous, and accessible pedestrian pathways throughout the winter season.

## Prioritization

The Prioritization analysis is a comprehensive approach to planning future projects related to accessibility improvements within the City. The goal is spatial identification of priority areas for ADA improvements. While the entire City requires upgrades to be accessible, the City is too large to be improved at one time or with one funding strategy. Prioritization is used as a planning tool to direct initial investments and influence the City's overall capital improvement plans. The Prioritization process utilized for the City's ADA Transition Plan includes:

- Infrastructure Compliance (data collected and extrapolated from the Accessibility Evaluation)
- Equity Analysis (census-based demographic data)
- Location-Based Factors (survey results from the community and GIS-based data supporting those results)

The product is a City-wide geographic distribution of Priority Scores. The above components are standardized and scored within each neighborhood, allowing each neighborhood to be compared with respect to each component score and an aggregate score.

### Framework for Prioritization

The project determined prioritization should be based off a combination of community input and technical data rather than just technical scores alone. Information collected at engagement events was used to identify where residents feel ADA improvement is most valued. Survey participants at Public Engagement events voted on which areas they were most concerned about with respect to accessibility, with results shown in Figure 2. The most common voting preference was to invest in areas that are out of ADA compliance or present dangerous obstacles to pedestrian travel. These areas are identified by the self-evaluation, and the project assigned the highest priority score to neighborhoods with greater non-compliance. The next popular option was to prioritize highly populated residential areas, followed by proximity to schools, commercial areas, and parks. Prioritization scores were established to give credit to these areas, with more possible points for more popular responses from the voting exercise.

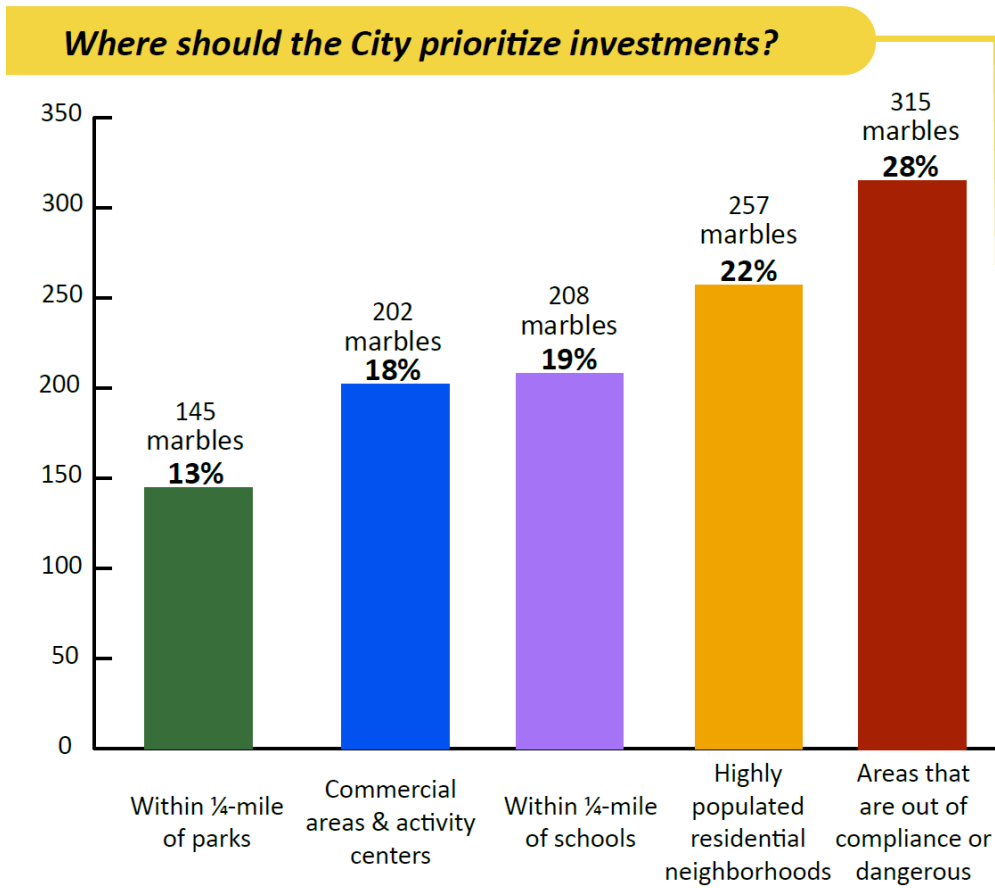


Figure 2: Engagement Survey Results indicating public preference for accessibility improvements.

Overall Prioritization scores are assigned to each of the 93 City neighborhoods, with scores ranging from 0 to 100. Neighborhoods with higher scores are considered to require ADA improvements more urgently. The City places 75% of the score on Infrastructure Compliance, 20% on Equity Analysis, and 5% on Location-Based Factors.

### Infrastructure Compliance from the Accessibility Evaluation

The existing state of compliance within each neighborhood is the foundation upon which future investment is planned. Most curb ramps and sidewalk segments are non-compliant, but the data collected during the project evaluation allows for more detail than a yes/no compliance score. Curb ramps and sidewalks that are egregiously non-compliant (multiple sources of non-compliance or missing compliant measurements by large margins) earn higher scores because they present a more significant barrier to accessible navigation than other non-compliant facilities.

#### Curb Ramps

The project assigns a full non-compliant score of 1.0 for missing curb ramps (where existing sidewalks meet the curbline), a score of 0.0 for fully compliant curb ramps, and intermediate

values for those ramps that are non-compliant in at least one metric. Ramps with scores closer to 1.0 have curb cuts but were observed to be deficient in slopes, presence and location of detectable warnings, physical condition, and changes in level.

Curb ramps not directly evaluated during the project were assigned compliance scores based on their neighborhood’s year of construction:

- Ramps built before 2012 were assigned a score of 0.70 (this value is rounded up from the highest observed neighborhood score, assuming less compliance).
- Ramps built more recently than 2020 were assigned a score of 0.20 (this value is rounded down from the lowest observed neighborhood score, assuming more compliance).

**Sidewalks**

Sidewalks were treated similarly to curb ramps; compliance scores range from 0.0 to 1.0 per segment, with scores of 0.0 corresponding to a sidewalk segment found to be compliant by every metric. Sidewalk segments were variable in length but typically the length of one sidewalk block. Each evaluated segment was walked from end to end, and the number of non-compliant metrics totaled. Scores closer to 1.0 feature frequent steep cross slopes (perpendicular to the direction of pedestrian travel), changes in level, heaving, faulting, cracking, and obstacles that reduce sidewalk width.

Sidewalk data was collected in small samples to represent the compliance scores for all neighborhoods outside 2012-2020 construction years. Samples were selected based on location most central to the neighborhood or the anecdotally known worst spot. The accessibility score for each neighborhood will change over time as more data is collected and with each improvement project.

**Scores**

Each evaluated neighborhood has been assigned an average curb ramp score between 0 and 1 and an average sidewalk score between 0 and 1, based on actual field observations. Each score was scaled so the highest possible score (representing 100% non-compliance) is 75. Table 1 shows the Sidewalk Compliance Scores, Curb Ramp Compliance Scores, and Aggregate Compliance Scores for each neighborhood. In addition, Figure 3 shows the City-wide distribution of Aggregate Compliance Scores.

YEAR	NEIGHBORHOOD	Sidewalk Compliance Score	Curb Ramp Compliance Score	Aggregate Compliance Score	Scaled to 75 Points
2039	Albert/Goodrich	0.26	0.70	0.96	<b>36.0</b>
2008	Arlington/Pascal	0.30	0.70	1.00	<b>37.6</b>
2013	Arlington/Rice	0.27	0.35	0.62	<b>23.1</b>
2028	Arlington/Ruth	0.44	0.20	0.64	<b>24.1</b>
2041	Ashland/Arundel	0.26	0.70	0.96	<b>36.0</b>
2008	Ashland/Pascal	0.33	0.70	1.03	<b>38.7</b>

2006	Baker/Bellows	0.35	0.70	1.05	<b>39.5</b>
2012	Battle Creek/Upper Afton	0.56	0.46	1.02	<b>38.2</b>
1996	Bidwell/Congress	0.31	0.70	1.01	<b>38.0</b>
2034	Blair/Chatsworth	0.54	0.70	1.24	<b>46.6</b>
2011	Blair/Griggs	0.34	0.70	1.04	<b>39.2</b>
2032	Cambridge/Princeton	0.31	0.70	1.01	<b>37.7</b>
2043	Case/Edgerton	0.44	0.70	1.14	<b>42.7</b>
2002	Case/Hazelwood	0.48	0.70	1.18	<b>44.1</b>
2004	Case/Ruth	0.35	0.70	1.05	<b>39.4</b>
2031	Central Avenue	0.52	0.70	1.22	<b>45.7</b>
2001	Charles/Griggs	0.43	0.70	1.13	<b>42.3</b>
2000	Chatsworth/Charles	0.29	0.70	0.99	<b>37.1</b>
2006	Chatsworth/Goodrich	0.43	0.70	1.13	<b>42.3</b>
1999	Chatsworth/Hoyt	0.37	0.70	1.07	<b>40.0</b>
2015	Como/Chatsworth	0.40	0.43	0.83	<b>30.9</b>
2023	Como/Valentine	0.32	0.20	0.52	<b>19.7</b>
2002	Cottage/Greenbrier	0.39	0.70	1.09	<b>41.0</b>
2024	Cretin/Bayard	0.33	0.20	0.53	<b>19.7</b>
2009	Cretin/Goodrich	0.36	0.70	1.06	<b>39.7</b>
2004	Davern/Bayard	0.31	0.70	1.01	<b>38.0</b>
2010	Davern/Jefferson Phase I	0.20	0.70	0.90	<b>33.8</b>
2011	Davern/Jefferson Phase II	0.29	0.70	0.99	<b>37.2</b>
1998	Doswell/Chemford	0.38	0.70	1.08	<b>40.3</b>
2008	Earl/Mclean	0.35	0.70	1.05	<b>39.5</b>
2003	Edgebrook/Morningside	0.29	0.70	0.99	<b>37.2</b>
2005	Edmund/Galtier	0.38	0.70	1.08	<b>40.6</b>
2014	Fairview/Bohland	0.66	0.54	1.20	<b>44.9</b>
2001	Fifth/Kennard	0.43	0.70	1.13	<b>42.2</b>
2038	Finn/Jefferson	0.29	0.70	0.99	<b>37.1</b>
2025	Fourth/Howard	0.24	0.20	0.44	<b>16.5</b>
2010	Front/Victoria Phase I	0.37	0.70	1.07	<b>39.9</b>
2011	Front/Victoria Phase II	0.45	0.70	1.15	<b>43.1</b>
2007	Griggs/Jefferson	0.38	0.70	1.08	<b>40.3</b>
2021	Griggs/Scheffer Phase I	0.32	0.20	0.52	<b>19.3</b>
2022	Griggs/Scheffer Phase II	0.24	0.20	0.44	<b>16.4</b>
2046	Grotto/Goodrich	0.28	0.70	0.98	<b>36.7</b>
1999	Grotto/Hoyt	0.32	0.70	1.02	<b>38.1</b>
2013	Hatch/Agate	0.43	0.42	0.85	<b>32.0</b>
2026	Hatch/Park	0.43	0.20	0.63	<b>23.5</b>
1999	Hewitt/Aldine	0.51	0.70	1.21	<b>45.4</b>
2014	Hewitt/Pascal	0.38	0.54	0.92	<b>34.5</b>
2012	Hewitt/Tatum	0.55	0.58	1.13	<b>42.4</b>

2027	Hoyt/Birmingham	0.57	0.20	0.77	<b>28.8</b>
2010	Hoyt/Kennard	0.43	0.70	1.13	<b>42.2</b>
2002	Hoyt/Merrill	0.26	0.70	0.96	<b>36.0</b>
2007	Hubbard/Griggs	0.41	0.70	1.11	<b>41.5</b>
2017	Idaho/Atlantic	0.30	0.36	0.66	<b>24.7</b>
2027	Ivy/Birmingham	0.58	0.20	0.78	<b>29.4</b>
1999	Ivy/Earl	0.40	0.70	1.10	<b>41.3</b>
2008	Ivy/Kennard	0.49	0.70	1.19	<b>44.7</b>
2001	Knapp/Hillside	0.33	0.70	1.03	<b>38.7</b>
2009	Knapp/Raymond	0.32	0.70	1.02	<b>38.4</b>
1997	Lafond/Grotto	0.30	0.70	1.00	<b>37.5</b>
2049	Londin Lane/Burlington	0.45	0.70	1.15	<b>43.3</b>
2013	Madison/Benson	0.53	0.63	1.16	<b>43.6</b>
2009	Magnolia/Earl Phase I	0.43	0.70	1.13	<b>42.4</b>
2010	Magnolia/Earl Phase II	0.34	0.70	1.04	<b>39.0</b>
1998	Margaret/Arcade	0.34	0.70	1.04	<b>39.2</b>
2003	Margaret/Atlantic	0.37	0.70	1.07	<b>39.9</b>
2044	Marshall/Dayton	0.30	0.70	1.00	<b>37.3</b>
2014	Montana/Greenbrier	0.35	0.29	0.64	<b>23.9</b>
1997	Morgan/Edgcumbe	0.35	0.70	1.05	<b>39.4</b>
2006	Orange/Park	0.43	0.70	1.13	<b>42.5</b>
1997	Page/Cherokee	0.56	0.70	1.26	<b>47.2</b>
2029	Page/Hall	0.59	0.20	0.79	<b>29.7</b>
2001	Page/Manomin	0.31	0.70	1.01	<b>38.0</b>
2011	Page/Woodbury	0.58	0.70	1.28	<b>47.8</b>
2033	Pascal/Como	0.31	0.70	1.01	<b>38.0</b>
1999	Pascal/Jefferson	0.29	0.70	0.99	<b>37.1</b>
2036	Portland/Victoria	0.33	0.70	1.03	<b>38.4</b>
2012	Prior/Goodrich	0.61	0.31	0.92	<b>34.4</b>
2000	Prior/Jefferson	0.32	0.70	1.02	<b>38.1</b>
1998	Railroad Island	0.50	0.70	1.20	<b>45.0</b>
2050	Raymond/Territorial	0.24	0.70	0.94	<b>35.3</b>
2040	Seminary/Chatsworth	0.43	0.70	1.13	<b>42.3</b>
2008	Seventh/Bay	0.42	0.70	1.12	<b>41.9</b>
2004	Seventh/Daly	0.27	0.70	0.97	<b>36.4</b>
2010	Seventh/Douglas	0.25	0.70	0.95	<b>35.6</b>
2000	Seventh/Eleanor	0.47	0.70	1.17	<b>43.8</b>
2035	Thomas/Aldine	0.50	0.70	1.20	<b>45.0</b>
1998	Thomas/Mackubin	0.41	0.70	1.11	<b>41.6</b>
2000	Western/Lawson	0.34	0.70	1.04	<b>39.0</b>
2003	Wheeler/Iglehart	0.32	0.70	1.02	<b>38.1</b>
2025	Wheelock/Grotto	0.30	0.20	0.50	<b>18.8</b>

2007	White Bear/Burns	0.31	0.70	1.01	<b>38.0</b>
2018	Woodlawn/Jefferson Phase II	0.65	0.48	1.13	<b>42.5</b>
2051	Woodlawn/Jefferson Phase II	0.28	0.70	0.98	<b>36.6</b>
	Unassigned				
<b>CITY AVERAGES</b>		<b>0.38</b>	<b>0.61</b>	<b>0.99</b>	<b>37.2</b>

Table 1: Infrastructure Compliance Scores by Neighborhood

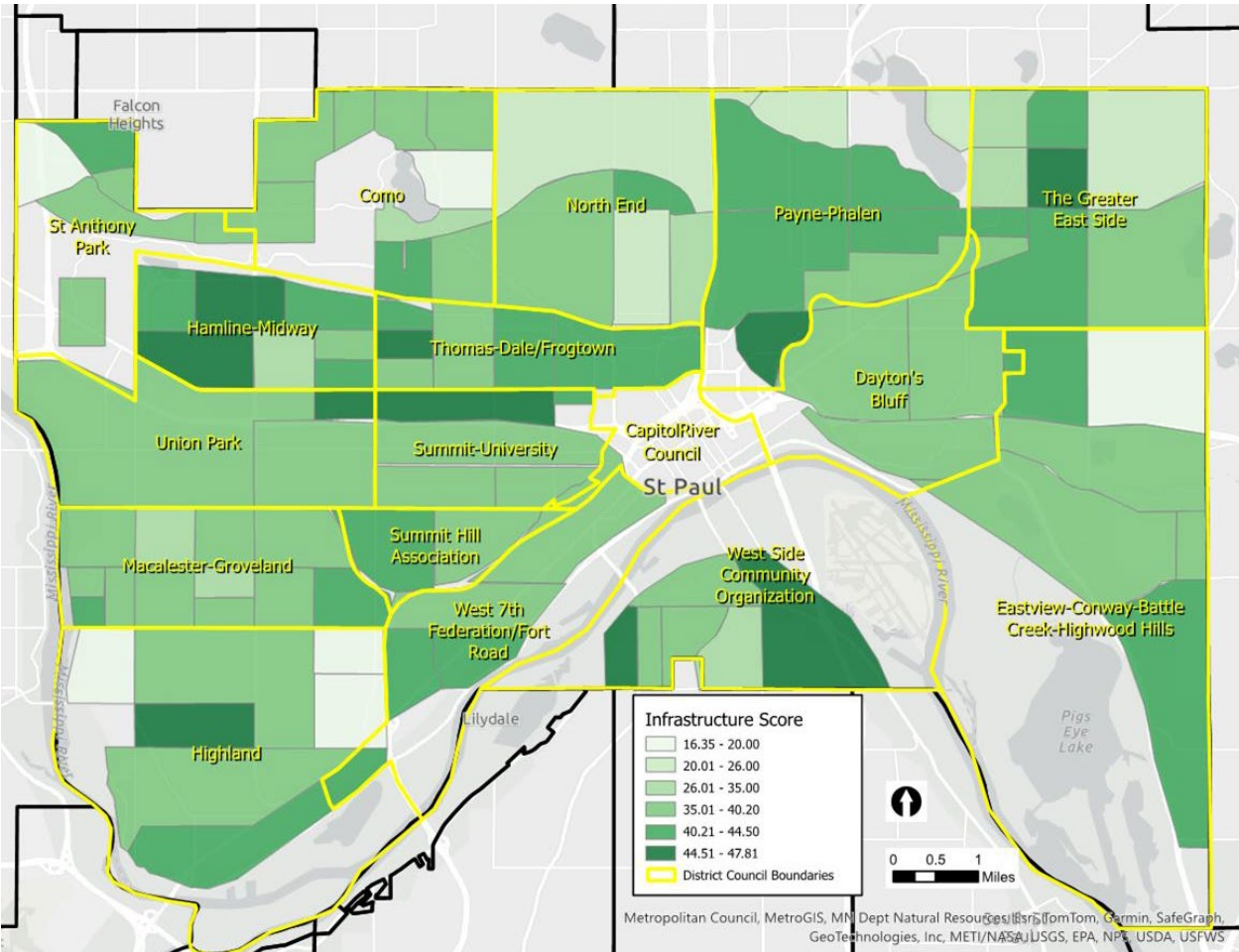


Figure 3: Geographic Distribution of Infrastructure Compliance Scores by Neighborhood (Note: data was not collected from areas shown as gray, which are typically parks, golf courses, industrial or agricultural areas. The Central Business District was not included.)

**Equity Analysis Demographic Data**

Prioritization utilizes demographic data to ensure equitable allocation of the City's infrastructure improvements related to accessibility. On top of accessibility compliance of the built infrastructure, the City considers residents that rely on non-motorized travel and

accessible facilities. Demographic data was collected from the City and the latest Census survey.

Prioritization scoring was based on the geographic distribution of data. Points were assigned to project areas (neighborhoods) according to the following characteristics aimed at understanding differential needs related to walking, biking, and general need for accessible infrastructure:

- Race
- Disability status
- Age
- Areas of concentrated poverty
- Healthcare access
- Language proficiency
- Vehicle ownership
- Transit presence

A highest possible score of 20 points was assigned to each neighborhood/project area. These points represent the importance of accessible facilities to residents of each neighborhood, and are assigned without regard to the presence or accessibility of a neighborhood's pedestrian facilities. Figure 4 shows the relative point distribution applied to the City's neighborhoods.

### Location-Based Factors

Prioritization also accounts for land-use characteristics of each project area and feedback obtained from the public and the disability community (through engagement event voting). An important factor for accessibility is identifying pedestrian generators such as schools, businesses, parks, and high-density residential. Points were assigned to neighborhoods with a possible maximum of 5 points, assigned for metrics proportionate to their voting results (most points for population density, intermediate points for the presence of schools and business-rich areas, and lower points for the presence of parks). The City has a Pedestrian Plan in place that has already analyzed related metrics and identified sidewalk gaps. This analysis did not recreate priority areas, although it has similar elements, and is focused on the accessibility of current sidewalks rather than the absence of facilities.

The combined spatial distribution of points for Equity and Location-Based are shown as overlapping data sets in Figure 3. Regions shown with both darker shade and a thicker, denser texture have high scores in both categories, while regions shown in lighter shade and sparse texture have low scores in both categories. Numerical scores are not shown but have been calculated for the City's planning purposes.

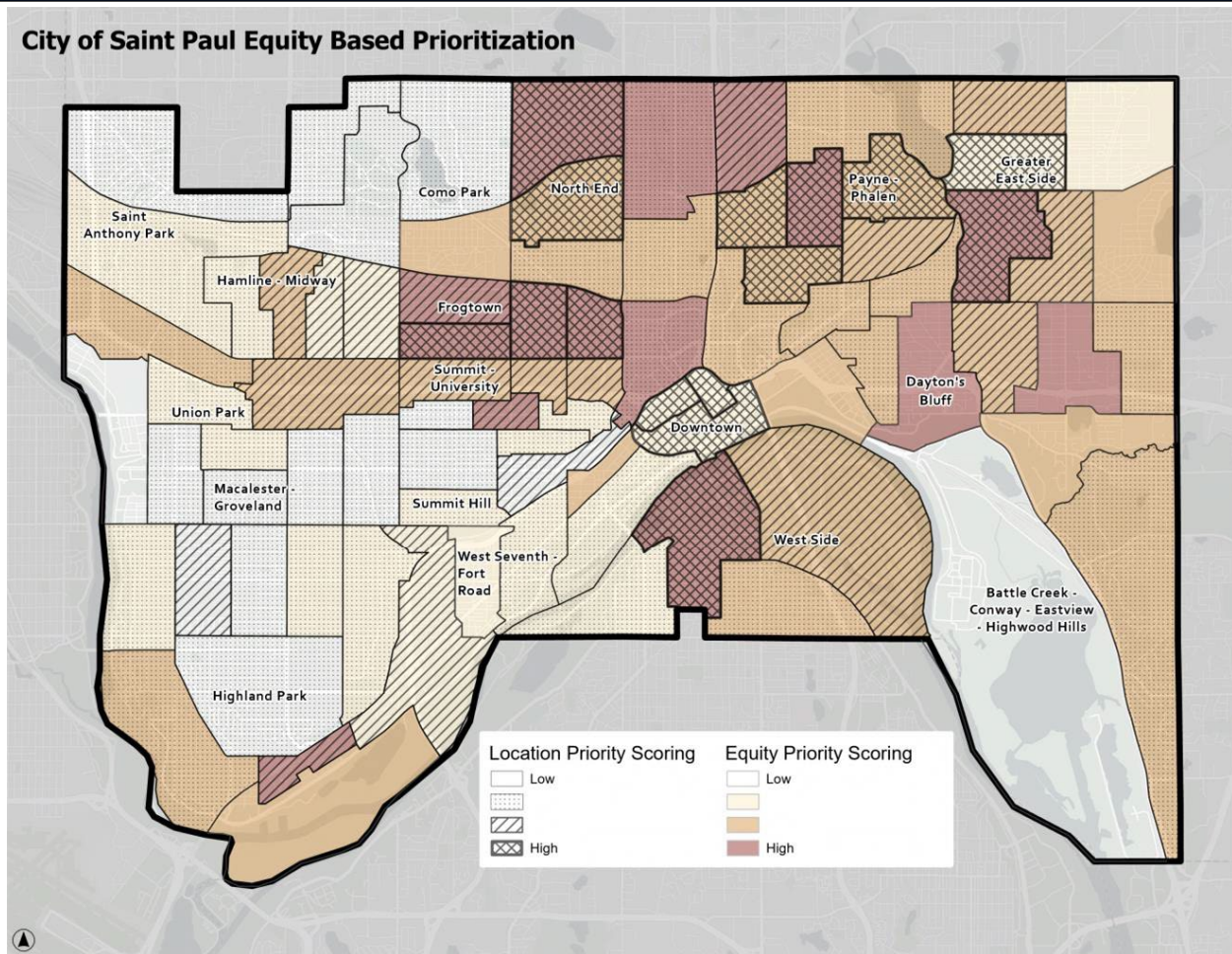


Figure 4: Relative Scores of Equity and Location-Based Analysis by Neighborhood

### Prioritization Matrix - Aggregate Scores by Neighborhood

Each neighborhood within the City has been assigned three individual component scores (infrastructure compliance, equity, and location-based), which have been combined to form an aggregate score. Due to the focus on accessibility, 75% of the aggregate score is the infrastructure compliance score. Neighborhoods featuring more non-compliant facilities deserve investment in their facilities and therefore receive a higher Prioritization Score. Survey results from engagement events show the top concern being facilities out of compliance, which supports the high score for compliance data.

20% of the aggregate score comes from the demographic characteristics of each neighborhood. The City highlights those communities with greater prevalence of disability, more reliance on walking, biking, or transit, and those that have been underrepresented in prior improvements. The final 5% of each neighborhood's aggregate score is generated by the presence and proximity of schools, parks, commercial areas, and high population density. These metrics were voted on by the community during engagement events for the

Transition Plan project. The City already has Priority Pedestrian Areas based on similar metrics, so the relative contribution to the aggregate score is not intended to overshadow other project analyses.

Figure 5 shows the geographic distribution of all three categories combined into aggregate scores. The following construction neighborhoods are in the highest tier of Priority Score:

- Blair/Chatsworth (Frogtown)
- Thomas / Mackubin (Frogtown)
- Page / Woodbury (West Side)
- Case / Hazelwood (Greater East Side)

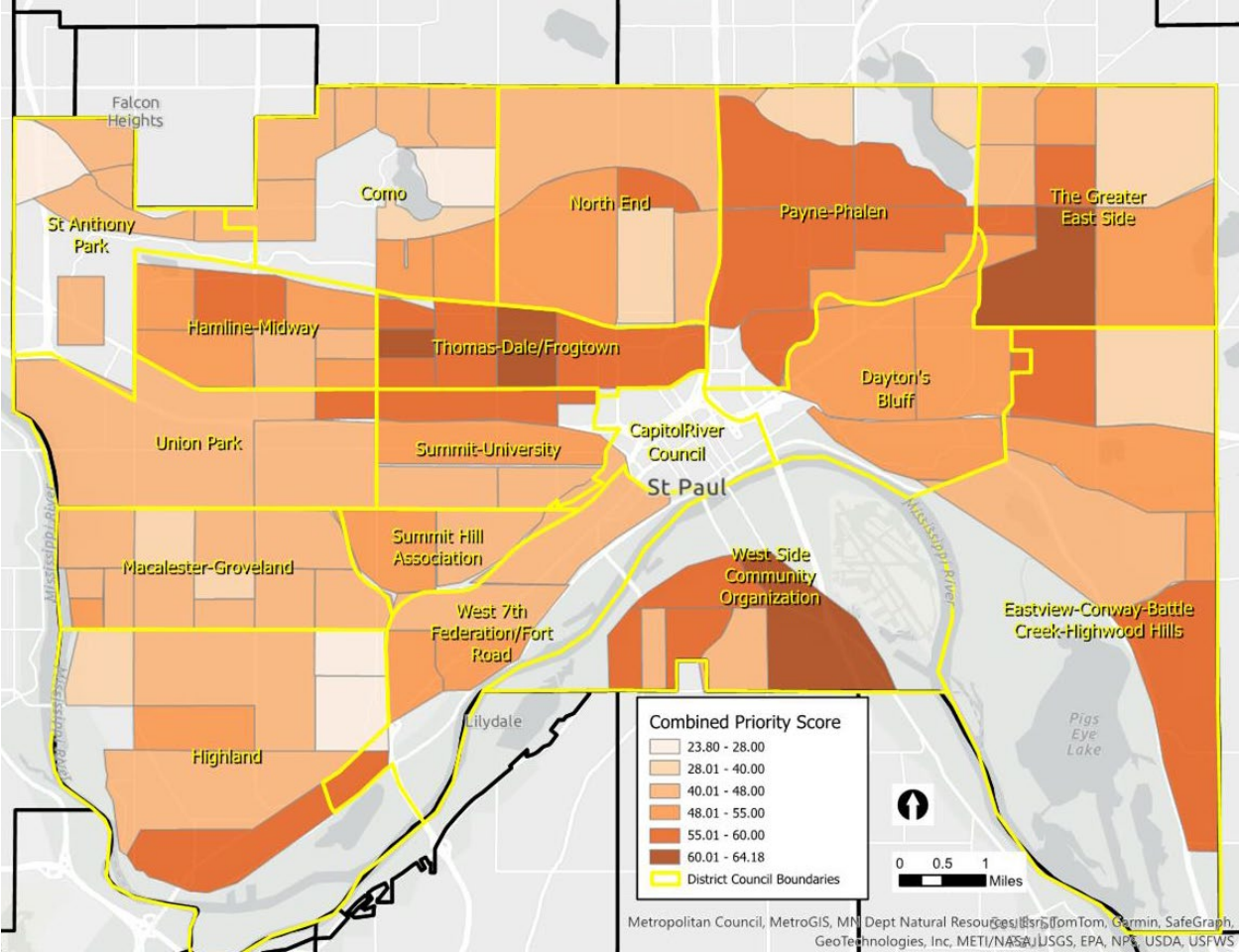


Figure 5: Aggregate Priority Scoring

## Implementation

### Methodology to Achieve ADA Compliance

The City improves pedestrian facilities through a range of actions, from spot repairs to full replacements, to meet ADA compliance standards. Maintenance activities include asphalt patching and panel grinding, while panel replacement is incorporated into multiple City projects. However, only one dedicated funding source directly supports the priority model outlined in this Plan.

The Sidewalk Program receives \$1.5 million annually to fund panel replacement, grinding repairs, and personnel costs. Aside from this, the City is occasionally successful in grant application which also directly supports this Plan in addition to the City's Bike and Pedestrian Plans. Other scheduled capital improvement projects are driven by separate priorities and initiatives, with accessibility improvements included as a secondary benefit.

Across all programs, the City spends \$2 million to \$3 million each year on curb ramps and sidewalk improvements as part of public works projects, which can replace 270-400 curb ramps (approximately 2.5% of the City's ramps) or 125-200 sidewalk blocks (1.0% of the City's sidewalks) annually. This rate is based on an average cost of \$7500 per curb ramp quadrant and \$16,000 per sidewalk segment, in 2026 dollars.

A 100% compliance rate for the entire City is not a realistic goal, because achieving compliance is a temporary status for each facility. Compliant facilities will return to a state of non-compliance as pavement deteriorates over time and repeated freeze-thaw cycles move panels enough to present accessibility barriers. With the large number of facilities under the City's jurisdiction and a finite budget (and the impracticability of working many places at one time), improvements will reach their lifespans before all neighborhoods are addressed. The City will continue to make annual improvements and will eventually replace non-compliant sidewalks and curb ramps in every neighborhood (per current ADA standards). However, investments in curb ramps and sidewalks is a never-ending process.

Setting a City-wide compliance goal is most relevant when broken into useful short-term checkpoints. Within the plannable future, achieving 20%, 30%, 40%, or 50% compliance will require diligence and intermediate project goals. For the sake of a long-term planning approach, the City sets a 50% compliance target.

### Schedule and Budget

The Plan is not a single improvement project, but a tool to identify compliance deficiency across a multitude of construction projects. Additionally, the Capital Improvement Plan (CIP) for the City includes budgetary estimates for anticipated Capital Improvements which will include ADA related projects moving forward. The ADA Transition Plan will serve as an additional resource to highlight needs on identified projects.

Based on the scoring indicators discussed above, the City forecasts investment in accessibility improvements according to the following.

**Existing Compliance (2025 Snapshot)**

As of the end of 2025, the City has approximately 7% of compliant curb ramps and 6% compliant sidewalks. This percentage was estimated by combining:

- observed compliance rates (from the Self-evaluation) in select neighborhoods last reconstructed **2012 - 2019**,
- assuming 90% compliance in neighborhoods last reconstructed **since 2019**,
- assuming 1.0 to 3.0% compliance in neighborhoods last reconstructed **prior to 2012** (an approximation based on extrapolating observed data)

**Projection with Current Funding and Planned Projects**

With the City’s current funding level (described above), the City can expect to reach the 50% compliance level for curb ramps and sidewalks (combined) in approximately 60 years, around 2085. This projection assumes funding keeps pace with rising construction costs, and does not account for the rate of deterioration of assets.

The City will reach 11-12% compliance after the year 2030 based on the next five years of planned neighborhood improvements and other projects. Construction projects are planned for the following construction neighborhoods, which include approximately 600 total curb ramps and 700 total sidewalk segments:

- Hatch/Park                    146 curb ramps; 192 sidewalks
- Hoyt/Birmingham        66 curb ramps; 56 sidewalks
- Ivy/Birmingham            56 curb ramps; 52 sidewalks
- Arlington/Ruth            135 curb ramps; 198 sidewalks
- Page/Hall                    191 curb ramps; 195 sidewalks

**Projection with Accelerated Funding**

To meet the 50% goal in half that time, by the year 2055, the city will need to increase its funding by approximately \$74 million over the next 30 years (average of \$2.5 million per year in addition to its planned baseline amount). The following intermediate targets will keep the City on track for 50% compliance by 2055:

- Within 5 years, by 2030, the City will need to achieve 13.5% compliance. This will require an additional \$13.2 million beyond current funding.
- Within 10 years, by 2035, the City will need to achieve 20.8% compliance. This will require an additional \$25.3 million beyond current funding.
- Within 15 years, by 2040, the City will need to achieve 28.1% compliance. This will require an additional \$37.4 million beyond current funding.
- Within 20 years, by 2045, the City will need to achieve 35.4% compliance. This will require an additional \$49.5 million beyond current funding.

- Within 25 years, by 2050, the City will need to achieve 42.7% compliance. This will require an additional \$61.6 million beyond current funding.

### Monitoring Progress

The Plan and its appendices will be updated every three years (or as notable changes are desired) once adopted by City Council. With each Plan update, public engagement will occur to ensure the prioritization process accurately reflects current priorities. Each update will also include a formal public comment period before City Council adoption. The City will update its compliance data (GIS database) on an ongoing basis as improvements are made.

The scoring system described within this document will be updated per the following:

- Accessibility ratings are appended on an annual basis as repairs and construction projects are completed.
- Measures for evaluating equity will be updated as US Census data becomes available.
- The method for formulating priority scores will be modified as needed based on public input.

## Appendices

- A. Contact Information
- B. Self-Evaluation Results
- C. Data Field Inventory Guide
- D. Public Engagement Summary
- E. Policy Review
- F. Public Outreach
- G. Grievance Procedure
- H. Glossary of Terms

DRAFT



## Appendix A - Contact Information

### ADA Coordinator

Mark Zoller, Accessibility Coordinator

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15 West Kellogg Blvd  
Saint Paul, MN 55102

**Phone:** (651) 266-8966

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## Appendix B – Self-Evaluation Results

The City of Saint Paul Department of Public Works maintains the database of sidewalk and curb ramp data, which will be updated continuously as new data is collected. The following summarizes what was collected in 2024 and 2025 during the formal data collection process to inform the Transition Plan. Contact the ADA Coordinator or the Department of Public Works if you are looking for data at a specific location.

YEAR	NEIGHBORHOOD	Compliant Sidewalks	Total Sidewalks	Sidewalk Compliance Rate
2039	Albert/Goodrich	0	9	0.0%
2008	Arlington/Pascal	0	8	0.0%
2013	Arlington/Rice	16	220	7.3%
2028	Arlington/Ruth	0	10	0.0%
2041	Ashland/Arundel	0	8	0.0%
2008	Ashland/Pascal	0	10	0.0%
2006	Baker/Bellows	0	8	0.0%
2012	Battle Creek/Upper Afton	0	9	0.0%
1996	Bidwell/Congress	0	8	0.0%
2034	Blair/Chatsworth	0	8	0.0%
2011	Blair/Griggs	0	8	0.0%
2032	Cambridge/Princeton	0	9	0.0%
2043	Case/Edgerton	0	12	0.0%
2002	Case/Hazelwood	0	10	0.0%
2004	Case/Ruth	0	10	0.0%
2031	Central Avenue	0	13	0.0%
2001	Charles/Griggs	0	8	0.0%
2000	Chatsworth/Charles	0	11	0.0%
2006	Chatsworth/Goodrich	0	8	0.0%
1999	Chatsworth/Hoyt	0	10	0.0%
2015	Como/Chatsworth	1	82	1.2%
2023	Como/Valentine	0	9	0.0%
2002	Cottage/Greenbrier	0	10	0.0%
2024	Cretin/Bayard	0	10	0.0%
2009	Cretin/Goodrich	0	10	0.0%
2004	Davern/Bayard	0	8	0.0%
2010	Davern/Jefferson Phase I	0	10	0.0%
2011	Davern/Jefferson Phase II	0	10	0.0%
1998	Doswell/Chemford	0	8	0.0%
2008	Earl/Mclean	0	8	0.0%
2003	Edgebrook/Morningside	0	8	0.0%
2005	Edmund/Galtier	0	12	0.0%
2014	Fairview/Bohland	0	96	0.0%
2001	Fifth/Kennard	0	10	0.0%

2038	Finn/Jefferson	0	11	0.0%
2025	Fourth/Howard	0	8	0.0%
2010	Front/Victoria Phase I	0	8	0.0%
2011	Front/Victoria Phase II	0	16	0.0%
2007	Griggs/Jefferson	0	12	0.0%
2021	Griggs/Scheffer Phase I	0	9	0.0%
2022	Griggs/Scheffer Phase II	0	12	0.0%
2046	Grotto/Goodrich	0	9	0.0%
1999	Grotto/Hoyt	0	10	0.0%
2013	Hatch/Agate	0	67	0.0%
2026	Hatch/Park	0	9	0.0%
1999	Hewitt/Aldine	0	8	0.0%
2014	Hewitt/Pascal	2	144	1.4%
2012	Hewitt/Tatum	0	63	0.0%
2027	Hoyt/Birmingham	0	10	0.0%
2010	Hoyt/Kennard	0	10	0.0%
2002	Hoyt/Merrill	0	8	0.0%
2007	Hubbard/Griggs	0	8	0.0%
2017	Idaho/Atlantic	2	39	5.1%
2027	Ivy/Birmingham	0	10	0.0%
1999	Ivy/Earl	0	11	0.0%
2008	Ivy/Kennard	0	12	0.0%
2001	Knapp/Hillside	0	7	0.0%
2009	Knapp/Raymond	0	8	0.0%
1997	Lafond/Grotto	0	17	0.0%
2049	Londin Lane/Burlington	0	9	0.0%
2013	Madison/Benson	2	189	1.1%
2009	Magnolia/Earl Phase I	0	12	0.0%
2010	Magnolia/Earl Phase II	0	11	0.0%
1998	Margaret/Arcade	0	8	0.0%
2003	Margaret/Atlantic	0	8	0.0%
2044	Marshall/Dayton	0	13	0.0%
2014	Montana/Greenbrier	2	74	2.7%
1997	Morgan/Edgcumbe	0	10	0.0%
2006	Orange/Park	0	5	0.0%
1997	Page/Cherokee	0	10	0.0%
2029	Page/Hall	0	10	0.0%
2001	Page/Manomin	0	8	0.0%
2011	Page/Woodbury	0	10	0.0%
2033	Pascal/Como	0	8	0.0%
1999	Pascal/Jefferson	0	11	0.0%
2036	Portland/Victoria	0	10	0.0%
2012	Prior/Goodrich	0	86	0.0%

2000	Prior/Jefferson	0	10	0.0%
1998	Railroad Island	0	10	0.0%
2050	Raymond/Territorial	0	10	0.0%
2040	Seminary/Chatsworth	0	8	0.0%
2008	Seventh/Bay	0	9	0.0%
2004	Seventh/Daly	0	8	0.0%
2010	Seventh/Douglas	0	10	0.0%
2000	Seventh/Eleanor	0	8	0.0%
2035	Thomas/Aldine	0	10	0.0%
1998	Thomas/Mackubin	0	12	0.0%
2000	Western/Lawson	0	12	0.0%
2003	Wheeler/Iglehart	2	15	13.3%
2025	Wheelock/Grotto	0	10	0.0%
2007	White Bear/Burns	0	8	0.0%
2018	Woodlawn/Jefferson Phase I	0	16	0.0%
2051	Woodlawn/Jefferson Phase II	0	10	0.0%
-	Unassigned	-	-	-
	<b>CITY TOTAL</b>	<b>27</b>	<b>1872</b>	<b>1.44%</b>

YEAR	NEIGHBORHOOD	Compliant Curb Ramps	Total Curb Ramps	Curb ramp Compliance Rate
2039	Albert/Goodrich	-	-	-
2008	Arlington/Pascal	-	-	-
2013	Arlington/Rice	24	317	7.6%
2028	Arlington/Ruth	-	-	-
2041	Ashland/Arundel	-	-	-
2008	Ashland/Pascal	-	-	-
2006	Baker/Bellows	-	-	-
2012	Battle Creek/Upper Afton	1	16	6.3%
1996	Bidwell/Congress	-	-	-
2034	Blair/Chatsworth	-	-	-
2011	Blair/Griggs	-	-	-
2032	Cambridge/Princeton	-	-	-
2043	Case/Edgerton	-	-	-
2002	Case/Hazelwood	-	-	-
2004	Case/Ruth	-	-	-
2031	Central Avenue	-	-	-
2001	Charles/Griggs	-	-	-
2000	Chatsworth/Charles	-	-	-
2006	Chatsworth/Goodrich	-	-	-
1999	Chatsworth/Hoyt	-	-	-
2015	Como/Chatsworth	6	153	3.9%

2023	Como/Valentine	-	-	-
2002	Cottage/Greenbrier	-	-	-
2024	Cretin/Bayard	-	-	-
2009	Cretin/Goodrich	-	-	-
2004	Davern/Bayard	-	-	-
2010	Davern/Jefferson Phase I	-	-	-
2011	Davern/Jefferson Phase II	-	-	-
1998	Doswell/Chemford	-	-	-
2008	Earl/Mclean	-	-	-
2003	Edgebrook/Morningside	-	-	-
2005	Edmund/Galtier	-	-	-
2014	Fairview/Bohland	11	88	12.5%
2001	Fifth/Kennard	-	-	-
2038	Finn/Jefferson	-	-	-
2025	Fourth/Howard	-	-	-
2010	Front/Victoria Phase I	-	-	-
2011	Front/Victoria Phase II	-	-	-
2007	Griggs/Jefferson	-	-	-
2021	Griggs/Scheffer Phase I	-	-	-
2022	Griggs/Scheffer Phase II	-	-	-
2046	Grotto/Goodrich	-	-	-
1999	Grotto/Hoyt	-	-	-
2013	Hatch/Agate	4	92	4.3%
2026	Hatch/Park	-	-	-
1999	Hewitt/Aldine	-	-	-
2014	Hewitt/Pascal	6	155	3.9%
2012	Hewitt/Tatum	1	95	1.1%
2027	Hoyt/Birmingham	-	-	-
2010	Hoyt/Kennard	-	-	-
2002	Hoyt/Merrill	-	-	-
2007	Hubbard/Griggs	-	-	-
2017	Idaho/Atlantic	5	61	8.2%
2027	Ivy/Birmingham	-	-	-
1999	Ivy/Earl	-	-	-
2008	Ivy/Kennard	-	-	-
2001	Knapp/Hillside	-	-	-
2009	Knapp/Raymond	-	-	-
1997	Lafond/Grotto	-	-	-
2049	Londin Lane/Burlington	-	-	-
2013	Madison/Benson	2	120	1.7%
2009	Magnolia/Earl Phase I	-	-	-
2010	Magnolia/Earl Phase II	-	-	-
1998	Margaret/Arcade	-	-	-

2003	Margaret/Atlantic	-	-	-
2044	Marshall/Dayton	-	-	-
2014	Montana/Greenbrier	29	201	14.4%
1997	Morgan/Edgcumbe	-	-	-
2006	Orange/Park	-	-	-
1997	Page/Cherokee	-	-	-
2029	Page/Hall	-	-	-
2001	Page/Manomin	-	-	-
2011	Page/Woodbury	-	-	-
2033	Pascal/Como	-	-	-
1999	Pascal/Jefferson	-	-	-
2036	Portland/Victoria	-	-	-
2012	Prior/Goodrich	5	76	6.6%
2000	Prior/Jefferson	-	-	-
1998	Railroad Island	-	-	-
2050	Raymond/Territorial	-	-	-
2040	Seminary/Chatsworth	-	-	-
2008	Seventh/Bay	-	-	-
2004	Seventh/Daly	-	-	-
2010	Seventh/Douglas	-	-	-
2000	Seventh/Eleanor	-	-	-
2035	Thomas/Aldine	-	-	-
1998	Thomas/Mackubin	-	-	-
2000	Western/Lawson	-	-	-
2003	Wheeler/Iglehart	-	-	-
2025	Wheelock/Grotto	-	-	-
2007	White Bear/Burns	-	-	-
2018	Woodlawn/Jefferson Phase I	0	37	0.0%
2051	Woodlawn/Jefferson Phase II	-	-	-
-	Unassigned	7	31	22.6%
	<b>CITY TOTAL</b>	<b>101</b>	<b>1442</b>	<b>7.00%</b>

## Appendix C – Data Field Inventory Guide

For each sidewalk and curb ramp evaluated, the following questions were answered. This data includes national standards as defined by the Public Rights of Way Accessibility Guidelines (PROWAG) and is supplemented by data collected by the City of Saint Paul for ongoing assessment.

### SIDEWALKS

1. What is the typical measured width of the sidewalk, in feet?
  - <numerical answer>
2. How many obstacles were identified that reduce the sidewalk width to less than 32 inches?
  - 0
  - 1
  - 2 or more
3. How many discontinuities (faults, cracks, heaves, etc.) between 1/2" to 3" horizontal or vertical were identified?
  - 0 - 0
  - 1 - 1 to 5
  - 2 - 6 to 10
  - 3 - 11 or more
4. How many discontinuities (faults, cracks, heaves, etc.) 3" horizontal or vertical were identified?
  - 0 - 0
  - 1 - 1 to 2
  - 2 - 3 to 5
  - 3 - 6 or more
5. Were any of the vertical discontinuities from trees?
  - YES
  - NO
6. How many locations were identified with running slope greater than 5% (or steeper than adjacent roadway)?
  - 0
  - 1
  - 2 or more
7. What is the greatest running slope (%) measured?
  - <numerical answer>
8. How many locations were identified with cross slope greater than 2.0%

- 0 - 0
  - 1 - 1 to 5
  - 2 - 6 to 10
  - 3 - 11 or more
9. What is the greatest cross slope measured?
- <numerical answer>
10. Is there any evidence of ponding (active or sediment settling)?
- 0 - no
  - 1 - ponding towards ROW
  - 2 - ponding against hardscape
  - 3 - ponding against building

## **CURB RAMPS**

1. If the sidewalk crosses a curb, is there a curb ramp?
- YES
  - NO. If No, bypass all remaining questions
2. Is the curb ramp, excluding flares, at least 4 ft wide or matching the incoming PAR?
- YES
  - NO
3. Does the ramp contain detectable warnings?
- YES
  - NO
4. Are detectable warnings properly placed, extending the full width of the ramp, and contrasting visually with the walking surface?
- YES
  - NO
5. Are grade breaks located at top and bottom of ramps, not located on ramps and landings, perpendicular to the direction of pedestrian movement, and flush?
- YES
  - NO
6. Are ramp and curb surfaces flush, without horizontal or vertical discontinuities greater than 0.5 inch?
- YES
  - NO
7. What is the steepest measured running slope, in percent?
- <numerical answer>

8. What is the steepest measured cross slope, in percent?
  - <numerical answer>
9. What is the steepest measured landing slope, in percent?
  - <numerical answer>
10. What is the steepest running slope of secondary ramp(s)?, in percent?
  - <numerical answer>
  - N/A (no secondary ramps)
11. What is the steepest cross slope of secondary ramp(s)?, in percent?
  - <numerical answer>
  - N/A (no secondary ramps)
12. Are curb ramp flares (and curb transition slopes) no steeper than 10% (1:10)?
  - YES
  - NO
13. Is the gutter flowline slope no greater than 2.1% (1:48) in front of the curb ramp?
  - YES
  - NO
14. Is the gutter inslope no greater than 5.0% (1:20) in front of the curb ramp?
  - YES
  - NO

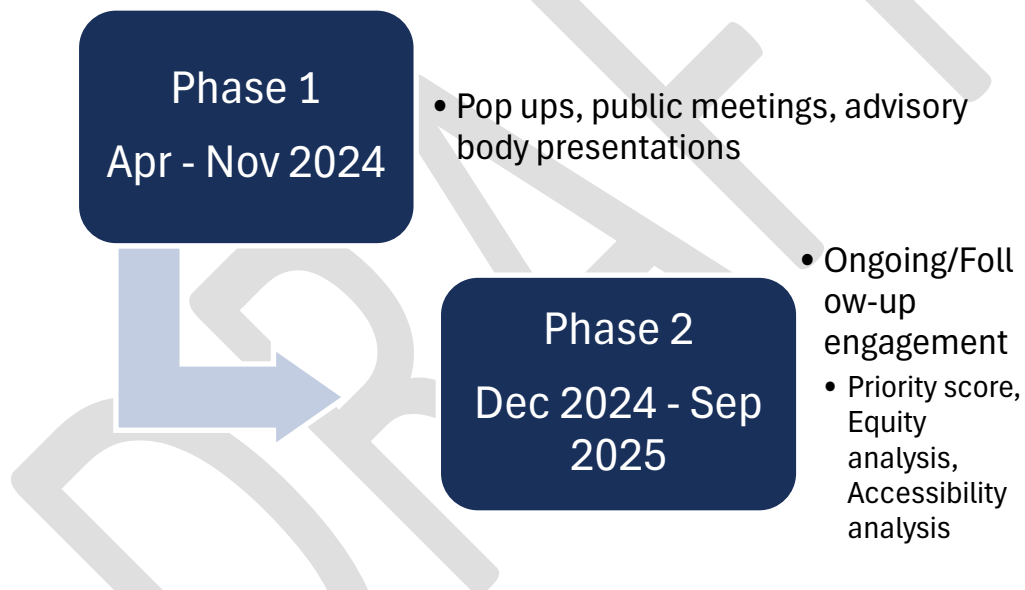
# Appendix D – Public Engagement Summary

## AMERICANS WITH DISABILITIES ACT (ADA) TRANSITION PLAN

### Engagement Summary

#### Our engagement efforts

Engagement for the City of St Paul ADA Transition Plan update was conducted with the public and stakeholders in two phases.



#### Phase 1

Phase I of Engagement for the Public Works ADA Transition Plan occurred between June and October of 2024. During this phase, two strategies were used to introduce the project to the community: gather input on current issues and needs, and understand how accessibility and the infrastructure system is working for the community. This document summarizes the engagement and feedback received throughout Phase I.



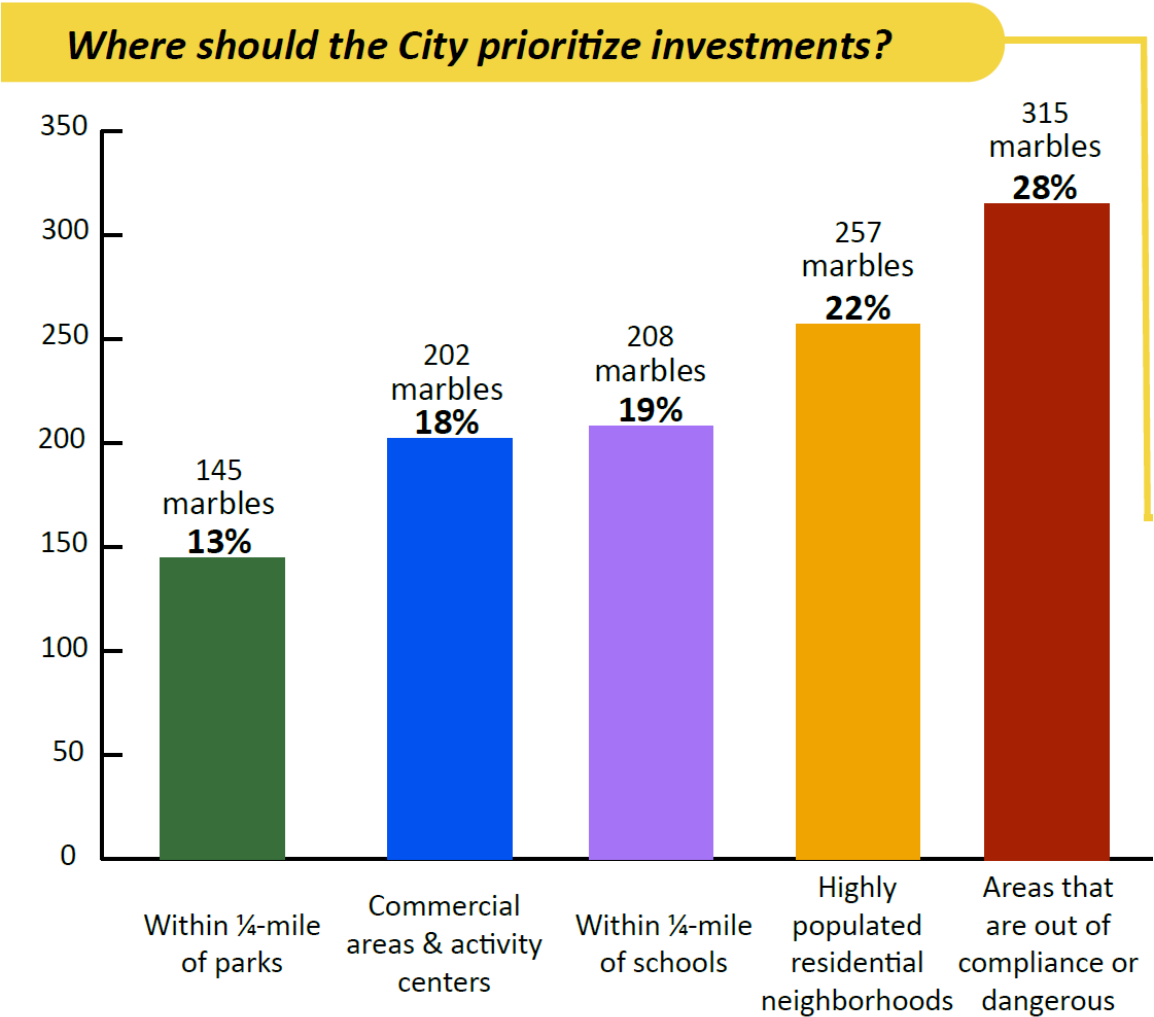
## Events and participants

- 5 community events and pop ups
  - Safe Summer Nights, West Minnehaha Recreation Center
  - Rice and Larpenteur Summer Block Party
  - West Side Farmers Market
  - Marydale Festival
  - Open House at the Rondo Community Library
- 290 online survey responses
- 7 presentations to District Councils and City Committees
  - Mayors Advisory Committee for People with Disabilities (MACPD)
  - City of Saint Paul Transportation Committee
  - North End Neighborhood Organization
  - CapitolRiver Council
  - Highland District Council Transportation Committee
  - The ARC
  - City of Saint Paul Advisory Council on Aging (ACOA)
- 26 public open house participants
- 43 community focus group participants
  - MSS MN Focus Group

## Results of engagement

To understand where accessibility investments ranked for community members, participants at in-person engagement events were asked to prioritize accessibility investments. Using marbles, each participant was asked to “spend” marbles in areas they would prioritize for ADA improvements. Priority area options included prioritizing investments:

- Within a quarter mile of parks
- Commercial areas & activity centers
- Within a quarter mile of schools
- Highly populated residential neighborhoods
- Areas that are out of compliance or dangerous



The top priorities for investment identified by the public are areas that are out of compliance or dangerous and highly populated residential neighborhoods.

### What we heard from the public

**Winter maintenance** like snow clearing is critical for sidewalk accessibility.

**Navigating construction** that impacts the street or sidewalks is very difficult due to obstructions.

Many respondents shared experiences with **cars not stopping or yielding for people in crosswalks**.

**Parked scooters and shared bikes are a significant issue** when navigating the sidewalk.

Widespread support for **system-wide improvements for people with disabilities**.

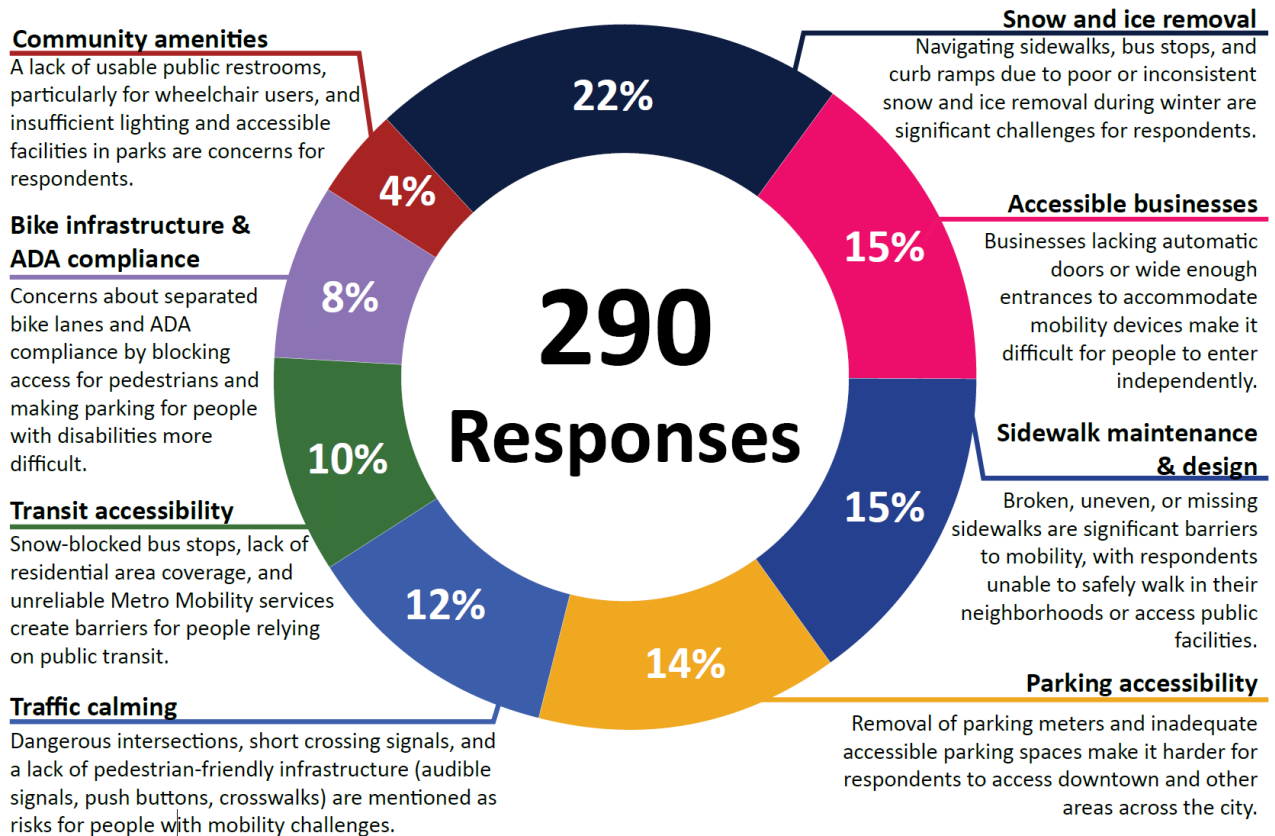
**Uneven or broken sidewalks** prevent residents using mobility devices from being able to move freely.

Consider the needs of **multiple types of disabilities when evaluating accessibility**.

**The ADA Transition Plan should consider best practices**, not just legal compliance.

### Online survey results

An online survey was shared to collect feedback from residents in the community. Surveys were distributed via direct outreach at in-person engagement events and shared online through GovDelivery email outreach, and shared on agency and partners social media channels. The survey focused on understanding people's experiences navigating the city, perceptions about the quality of the public realm and amenities offered, and aspirations for future accessibility improvements.



## How this feedback will be used

The project team is incorporating community input received in Phase I outreach to inform the priorities outlined in the ADA Transition Plan.

## Phase 2

The team presented phase 1 findings on the project webpage and in presentations to stakeholder groups. The team presented to the following groups:

- MACPD – August 19 2025
- NENO – August 25, 2025
- Highland Park DC Transportation Committee – September 9, 2025
- St Paul Transportation Committee – September 29, 2025
- Payne Phalen DC – November 25, 2025

## Appendix E – Policy Review

### Policy Review

The self-evaluation is a key portion of the ADA Transition Plan for public rights-of-way (ROW) and other facilities. In addition to a physical inventory, a review of the City of Saint Paul (hereinafter referred to as the City) policies, agreements, and relevant programs is also a component of the self-evaluation. The City provided the following documentation of existing policies and procedures related to ADA, for review. Each policy and plan was summarized with a short recommendation with potential recommendations for future consideration.

- City of Saint Paul Sidewalk Infill Policy
- City of Saint Paul Sidewalk Café Site Plan Standards
- City of Saint Paul and MnDOT Routine Maintenance Agreement
- City of Saint Paul and Ramsey County Joint Powers Agreement
- City of Paul and Lime Scooter Bike Sharing Agreement
- City of Saint Paul Policy Placement, Maintenance, and Removal of Storage Containers in the Public Right-of-Way
- City of Saint Paul Policy on Temporary Traffic Control Device Removal
- City of Saint Paul Complete Streets Action Plan
- Code of Ordinances of the City of Saint Paul: Snow and Ice on Sidewalks
- Code of Ordinances of the City of Saint Paul: Shared Transportation Systems
- Code of Ordinances of the City of Saint Paul: Driveway, Sidewalk, Curb or Surfacing of Boulevards
- City of Saint Paul Comprehensive Plan: Transportation Chapter
- City of Saint Paul Pedestrian Plan
- City of Saint Paul Street Design Manual
- City of Saint Paul Transportation Safety Action Plan

### City of Saint Paul Sidewalk Infill Policy

The City developed a policy that assesses new sidewalk construction based on the benefits to adjacent properties. It bundles sidewalk infill with roadway construction projects to streamline implementation, allowing for a single improvement project. This approach applies only where no sidewalk currently exists and is not applicable to mill and overlay projects. All sidewalk construction must meet ADA compliance requirements. The project does not recommend a change to this policy as it helps achieve ADA compliance via connectivity and creating space for walking and rolling.

### City of Saint Paul Sidewalk Café Site Plan Standards

City restaurants may expand their operations within the public ROW directly adjacent to their property with a Sidewalk Café Obstruction permit. The use is not exclusive and does not allow permanent installation, but rather permits temporary, movable tables, chairs, or planters. Installations must not encroach the pedestrian walk-through zone. This is an “area for pedestrian traffic that is no less than 48 inches wide” and must widen to 72 inches at regular intervals, for at least every 50 feet, to allow additional space for wheelchairs to pass. Owners must also submit a site plan that includes the entire area between the curb line and restaurant. The project found improvements can be made to how this policy is implemented by prioritizing the PAR and prohibiting installation of cafés on the sidewalk. Maintaining the existing walkway prevents redirecting the PAR to non-compliant surfaces when navigating through sidewalk cafés.

### City of Saint Paul and MnDOT Routine Maintenance Agreement

The City and MnDOT formalized an interagency agreement to define maintenance duties on MnDOT-owned roadways in Saint Paul. The City will perform routine maintenance that aligns with MnDOT standards, including maintenance that pertains specifically to the public ROW. MnDOT remains “responsible for any extraordinary maintenance, betterment, construction, or reconstruction on the State-owned roadways, bike shoulders, sidewalks, and bridges.” Project recommends City to continue working with MnDOT to meet ADA compliance.

### City of Saint Paul and Ramsey County Joint Powers Agreement

The City and Ramsey County entered into a joint powers agreement to clarify and coordinate maintenance duties for County owned streets and jurisdictional transfers. The City is responsible for maintaining County State Aid Highway (CSAH) or County Roads (CR) including snow and ice clearance, traffic signal maintenance, and routine road and bridge maintenance. It is recommended the interagency agreement be updated to include more explicit public ROW and ADA compliance language.

### City of Saint Paul and Lime and Spin Scooter Bike Sharing Agreement

The City entered into an agreement with Neutron Holdings, Inc (Lime) to operate electric scooters and electric-assisted bicycles on City property. The document is divided into 19 sections that outline the grant of use and utilization rates, maintenance and equipment standards, and operator responsibilities. Within the vendor responsibilities section, electric scooters and electric-assisted bicycles must not park or occupy space within existing public ROW in a way that impedes or compromises accessibility in accordance with the ADA.

Project recommends City to work with shared mobility provider to better enforce parking compliance. City will not be directly involved in the correction of parking compliance. Failure to comply can result in reevaluation of agreement between City and provider. Hopefully, as technology advances, provider can track and follow best practices with its customer.

### City of Saint Paul Policy on Placement, Maintenance, and Removal of Storage Containers in the Public Right-of-Way

The City enacted a policy placing restrictions and requirements on the use and placement of temporary, detached storage containers within Saint Paul maintained public ROW. These containers pose potential hazards to pedestrians, particularly individuals with disabilities. The policy details conditions for container placement to prevent obstruction, including positioning containers to avoid damage to the public ROW, relocating containers placed near curb face, and restricting contact with signal poles or other utilities. While the policy addresses general obstruction of sidewalks and the public ROW, it does not include language specific to ADA compliance. Project recommends updating language to include ADA requirements.

### City of Saint Paul Policy on Temporary Traffic Control Device Removal

A Temporary Traffic Control (TTC) removal policy is in place to protect the safety of roadway workers and users, and the City or vendors are responsible for removing TTC devices before reinstating normal traffic operations. If the TTC device is not available for immediate pickup, vendors are prohibited from obstructing areas outside of the vehicular zone, including pedestrian access routes. However, the document lacks ADA compliance requirements for TTC removal when addressing pedestrian access routes. Project recommends updating language to include ADA requirements.

### City of Saint Paul Complete Streets Action Plan

The City has established rules and regulations for the construction or repair of public ROW outside of the vehicle travel area, including driveways, sidewalks, curbs, or other impervious surfaces. The Public Works Director has the authority to “grant permission to owners of abutting property” and approve a licensed contractor for construction or reconstruction. Compliance with all applicable laws and regulations is mandatory for contractors. While the ordinance references compliance with zoning and other city regulations, the ordinance lacks mention of the ADA transition plan or includes any explicit ADA language. The ninth goal highlights sidewalk connectivity and infill, with an action to develop a pedestrian plan that identifies sidewalk gaps and provides citywide recommendations. This goal endorses a holistic approach to safety and crash reduction by aligning the ADA transition plan to improve pedestrian infrastructure. Project recommends no change to the current Complete Streets Action Plan.

### City of St. Paul Practice for Accessible Parking Spaces

The City acknowledges the importance of providing accessible parking spaces. Accessible parking requirements exist where on-street parking is metered. Most metered parking are in the downtown core. While actual space designated for accessible parking is limited, the city does allow a vehicle with valid disabled parking permit to park at any metered parking for 4-hours at no charge. The time limit for metered parking without a disabled parking permit is only 2-hours.

Many on-street parking spaces do not provide the required accessible aisle due to space constraints. Should an access aisle be required by a user, the City does provide accommodations in city-owned parking garages.

On residential streets, the City has a process where residents with valid disabled parking permit can apply for a designated parking in front of their home. Through this process, disabled parking signs are installed in the boulevard to designate the space as disabled parking only. While this does not guarantee or reserve the space for the resident, it does restrict those without a handicap permit from parking. Historically, the process requires 50% cost participation from the applicant. Based on public feedback, the City is considering reducing cost to lessen burden for residents.

### Code of Ordinances of the City of Saint Paul: Snow and Ice on Sidewalks

The tenant or property or dwelling owner is responsible for the removal of snow or ice within 24 hours of snowfall or after the accumulation period per section 113.02 of Saint Paul municipal code. If snow or ice clearance is not completed within the timeframe, it is considered a nuisance, and the property owner and/or tenant are required to pay a fee based on the Public Works Department's rate or the cost from a third-party contractor. To remove barriers to access for individuals using wheelchairs, older adults, and families with strollers, the code should incorporate ADA compliance requirements or language.

Report an incident to the Department of Safety and Inspections:  
<https://www.stpaul.gov/departments/safety-inspections/report-incident>

### Code of Ordinances of the City of Saint Paul: Shared Transportation Systems

The City codified shared system requirements and regulatory standards to ensure vendor compliance and protect the health, safety, and welfare of City residents. Vendors must obtain a valid contract with the City, which must be approved by the appropriate director and the City Council. While this ordinance does not explicitly reference ADA compliance requirements, the approved contract confirms that shared transportation vehicles will not obstruct public ROW, including interference with maintenance or bike rack access, unless expressly permitted.

### Code of Ordinances of the City of Saint Paul: Driveway, Sidewalk, Curb or Surfacing of Boulevards

The City has established rules and regulations for the construction or repair of public ROW outside of the vehicle travel area, including driveways, sidewalks, curbs, or other impervious surfaces. The Public Works Director has the authority to "grant permission to owners of abutting property" and approve a licensed contractor for construction or reconstruction. Compliance with all applicable laws and regulations is mandatory for contractors. While the ordinance references compliance with zoning and other city regulations, the ordinance lacks mention of the ADA transition plan or includes any explicit ADA language. The ninth goal highlights sidewalk connectivity and infill, with an action to develop a pedestrian plan that identifies sidewalk gaps and provides citywide recommendations. This goal endorses a

holistic approach to safety and crash reduction, aligning the ADA transition plan to improve pedestrian infrastructure.

### City of Saint Paul Comprehensive Plan: Transportation Chapter

The Saint Paul Comprehensive Plan's Transportation Chapter supports a multimodal environment for all users with an emphasis prioritizing safety and racial equity. The chapter is organized by goals with a list of associated policies. The first goal is to prioritize investments that align with equity efforts to improve job access for residents that rely on transit and active transportation. These investments were informed by the City of Saint Paul Bicycle Plan and Pedestrian Plan, and include sidewalk infill, bikeway connections, and improvements near transit and job centers. The second goal focuses on safety and accessibility for all users. One policy provision calls for designing public ROW to accommodate for older adults, children and those with mobility constraints. It notes alignment with the Saint Paul Street Design Manual and Safe Routes to School Plans. While not explicitly referencing ADA compliance requirements, the plan aligns with other documents that mention the ADA transition plan and compliance.

### City of Saint Paul Pedestrian Plan

The City's Pedestrian Plan seeks "a connected, safe and comfortable pedestrian transportation network ensures all people have equitable access and opportunity." The plan is organized into six chapters that follow a logical flow: goals, public engagement, identification of high-priority walking investments, infrastructure, maintenance and program priorities, and monitoring progress.

ADA compliance is mentioned throughout the document. To inform the policy framework and goals defined in Chapter Two, the City reviewed several existing policies, including the previous ADA Transition Plan. The plan references the existing processes for sidewalk infill, maintenance, and evaluation, noting the current costs associated with accessible pedestrian ramps and MnDOT standards. These considerations led to action items such as equitable sidewalk construction and accessible curb space. To monitor progress on the pedestrian transportation network, the document recommends updating the pedestrian curb ramp database annually to support ADA compliance and the ADA Transition Plan.

### City of Saint Paul Street Design Manual

The City created street design guidelines to support planners, engineers, decision-makers, and neighborhood groups in promoting inclusive and accessible future projects. This manual was informed by "guidelines for public rights-of-way (PROWAG) that address various issues, including access for blind pedestrians at street crossings, wheelchair access to on-street parking, and various constraints posed by space limitations, roadway design practices, slope, and terrain." Each section of the document includes context-sensitive treatments with specific guidance for individual designs. ADA-related considerations are included throughout and highlighted in Table 1 of the Policy Review document.

## City of Saint Paul Transportation Safety Action Plan

The City's Safe Streets for All Transportation Safety Action Plan aims to eliminate all serious injury and fatal crashes on surface streets. The plan uses the Safe System Approach, a framework that prioritizes safety for all roadway users by emphasizing proactive design and policies, improving infrastructure, and a shared responsibility among all users. This document also addresses pedestrians and bicyclists (vulnerable users), including those using wheelchairs or scooters, as well as people of all ages. Vulnerable users are at higher risk of being involved in a serious injury or fatal crash than those using vehicles in Saint Paul. Further, the plan emphasizes equity as a safety issue, noting disproportionate transportation related injuries and fatalities in Black and Indigenous communities. Finally, community engagement efforts identified several corridors and intersections that were difficult to navigate for wheelchair and mobility device users.

The Safety Action Plan prioritized segments and intersections using a data-driven approach that considered crash history and risk, access to opportunity such as equity priority areas, and project benefit. The framework is intended to be dynamic and flexible. The City is encouraged to review ADA Transition Plan requirements and apply them within the framework, prioritizing ADA transition projects.

## Policy Recommendations

While the City has adopted several plans and policies that support equity, design for vulnerable users, and safety, further integration of ADA compliance should be considered. SRF Consulting Group developed a Policy Review document (not included in this Appendix – Department of Public Works maintains the table as a separate document) that highlights the recommendations and requirements within the reviewed policies that overlap with ADA compliance and may be incorporated within the Transition Plan. Further, it includes whether the existing policy is in alignment with the ADA transition plan. This is organized under three categories:

1. References the ADA Transition Plan
2. Mentions vulnerable populations, ADA-related concepts, or accessibility, but not ADA Transition Plan
3. No mention vulnerable populations, ADA-related concepts, or accessibility

Out of the 15 policies reviewed, two did not mention ADA-related concepts, a Transition Plan or vulnerable populations. It is recommended that the City review these particular policies to identify any gaps and opportunities to include the results of the Plan and the City's priorities in a future update. Further, any future update of the existing 15 policies or new policies for the City may consider incorporation of the the prioritization and results.

## Appendix F – Public Outreach

The City recognizes that providing an opportunity for review and comment is an important part of this Plan. Comments will be recorded and, if feasible, modifications to the document content and prioritization of improvements will be made.

As part of the Plan development process, the City posted the draft plan document on the City [Public Works \(PW\) ADA Transition Plan | Saint Paul Minnesota](#) website, and made it available for public comment for a period of 30-days starting on April XX, 2026 and lasting until DATE, 2026.

A link to the plan was also distributed via email to school districts, medical facilities, and other public agencies with facilities in the City of Saint Paul. The following is the text that was included in the email notice.

***To whom it may concern:***

***The City of Saint Paul is seeking input from the public on its draft plan to support accessibility for people using its facilities. We invite you to review the draft version of the plan, posted on the Public Works ADA Transition Plan section of the City's website, as it is being finalized. Feel free to distribute this email to your colleagues, or other that may find this plan to be of interest. The purpose of this notice is to introduce the ADA Transition Plan to the public and inform those that work in "priority areas" related to accessibility about the City's work thus far. Any comments that you provide may be incorporated into the final version of the plan, and help the City of Saint Paul to identify key areas for improvement, including curb ramps, sidewalks, and traffic signals.***

***If you need reasonable accommodation, assistance, or require more information please contact the City of Saint Paul Accessibility Coordinator, Mark Zoller.***

***Thank you for your input,***

***City of Saint Paul***

***Comments received during this period can be found in the following pages of this Appendix.***

Record of Public Outreach Summary

The 30-day public comment period concluded on DATE, 2026 with no comments received/the following comments received:

## Appendix G – Grievance Procedure

Under the ADA, each agency is required to publish its responsibilities regarding the ADA. A draft of this public notice is provided below. If users of public ROW 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 the following grievance procedure for the prompt and equitable resolution of citizen complaints, concerns, comments, and other grievances.

The City understands that members of the public may desire to contact staff and discuss ADA issues without filing a formal grievance. Members of the public wishing to contact the staff should contact the Accessibility Coordinator, listed in **APPENDIX A**, and are encouraged to do so. Contacting the Accessibility Coordinator to informally discuss ADA issues is welcome and does not limit the ability or right to file a formal grievance later. If a formal complaint should be submitted by the grievant and/or her/his designee, a grievance should be filed no later than 60 calendar days after the alleged violation. Upon receipt of a completed Grievance Form, the Accessibility Coordinator will review the information in a timely manner and contact the complainant in order to attempt to find a resolution to the complaint. The grievance will be acknowledged or responded to within 20 working days of receipt. Within 60 days of the receipt, the Coordinator will conduct the investigation necessary to determine the validity of the alleged violation. If appropriate, the Coordinator will arrange to meet with the grievant to discuss the matter and attempt to reach an informal resolution to the grievance. Any informal resolution of the grievance will be documented in the City's ADA Grievance File. If the complainant is not satisfied with the resolution proposed by the Accessibility Coordinator, then within 30 days after the Coordinator's determination has been mailed to the grievant, the grievant may make a written appeal filed with Human Rights Deputy Director at the following address: Saint Paul City Hall 15 West Kellogg Blvd Saint Paul, MN 55102. The Deputy Director shall review the request for reconsideration and make a final determination within 90 days from the filing of the request. If the grievant is dissatisfied with City's handling of the grievance at any point, the grievant may file a complaint directly with the U.S. Department of Justice or other appropriate state or federal agency. Use of the City's grievance procedure is not a prerequisite to the pursuit of other remedies.

As per ADA requirements, the City has posted a notice outlining its responsibilities. This notice can be found in this Appendix.

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

### Internet

Visit the City of Saint Paul website <https://www.stpaul.gov/departments/human-rights-equal-economic-opportunity/accessibility/grievance-procedure> and select the "ADA Grievance Form". Fill in the form online and click "submit."

### Telephone

Contact the Accessibility Coordinator listed in the Contact Information section of Appendix A to submit an oral grievance. The ADA Coordinator will put this request in writing utilizing the Internet method above to submit the grievance on behalf of the person filing the grievance and will request in writing to be signed by the requestor.

### Public Notice

In accordance with the requirements of Title II of the Americans with Disabilities Act (ADA) of 1990, the City of Saint Paul will not discriminate against qualified individuals with disabilities on the basis of disability in City services, programs, or activities.

**Employment:** The City does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under title I of the Americans with Disabilities Act (ADA).

**Effective Communication:** The City will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in the City's programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairments.

**Modifications to Policies and Procedures:** The City will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all City programs, services, and activities. For example, individuals with service animals are welcome in City offices, even where pets are generally prohibited.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a City program, service, or activity, should contact the ADA Coordinator as soon as possible, but no later than 48 hours before the scheduled event.

The ADA does not require the City to take any action that would fundamentally alter the nature of its programs or services or impose an undue financial or administrative burden.

The City will not place a surcharge on an individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to persons who use wheelchairs.

## Appendix H – Glossary of Terms

**ABA:** See Architectural Barriers Act.

**ADA:** See Americans with Disabilities Act.

**ADA Transition Plan:** NDDOT's transportation system plan that identifies accessibility needs, the process to fully integrate accessibility improvements into the Statewide Transportation Improvement Program (STIP), and ensures all transportation facilities, services, programs, and activities are accessible to all individuals.

**ADAAG:** See Americans with Disabilities Act Accessibility Guidelines.

**Accessible:** A facility that provides access to people with disabilities using the design requirements of the ADA.

**Accessible Pedestrian Signal (APS):** A device that communicates information about the WALK phase in audible and vibrotactile formats.

**Alteration:** A change to a facility in the public right-of-way that affects or could affect access, circulation, or use. An alteration must not decrease or have the effect of decreasing the accessibility of a facility or an accessible connection to an adjacent building or site.

**Americans with Disabilities Act (ADA):** The Americans with Disabilities Act; Civil rights legislation passed in 1990 and effective July 1992. The ADA sets design guidelines for accessibility to public facilities, including sidewalks and trails, by individuals with disabilities.

**Americans with Disabilities Act Accessibility Guidelines (ADAAG):** contains scoping and technical requirements for accessibility to buildings and public facilities by individuals with disabilities under the Americans with Disabilities Act (ADA) of 1990.

**APS:** See Accessible Pedestrian Signal.

**Architectural Barriers Act (ABA):** 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.

**Capital Improvement Program (CIP):** The CIP for the Transportation Department includes an annual capital budget and a five-year plan for funding the new construction and reconstruction projects on the county's transportation system.

**Cross Slope:** The slope that is perpendicular to the direction of pedestrian travel.

**Curb Ramp (Pedestrian Curb Ramp):** A sloped connection that is cut through or built up to a curb. Curb ramps may be perpendicular or parallel to the curb or to the street they serve or be a combination thereof.

**Detectable Warning:** A surface feature of truncated domes, built in or applied to the walking surface to indicate an upcoming change from pedestrian to vehicular way.

**DOJ:** See United States Department of Justice

**Federal Highway Administration (FHWA):** A branch of the US Department of Transportation that administers the federal-aid Highway Program, providing financial assistance to states to construct and improve highways, urban and rural roads, and bridges.

**FHWA:** See Federal Highway Administration

**Grade:** See Running slope

**Grade Break:** The line where two surface planes with different running slopes meet.

**Pedestrian Access Route (PAR):** A continuous and unobstructed walkway within a pedestrian circulation path that provides accessibility.

**Pedestrian Circulation Route (PCR):** A prepared exterior or interior way of passage provided for pedestrian travel.

**PROWAG:** An acronym for the *Guidelines for Accessible Public Rights-of-Way* issued in 2005 by the U. S. Access Board. This guidance addresses roadway design practices, slope, and terrain related to pedestrian access to walkways and streets, including crosswalks, curb ramps, street furnishings, pedestrian signals, parking, and other components of public rights-of-way.

**Right of Way (ROW):** A general term denoting land, property, or interest therein, usually in a strip, acquired for the network of streets, sidewalks, and trails creating public pedestrian access within a public entity's jurisdictional limits.

**Running Slope:** The slope that is parallel to the direction of pedestrian travel

**Section 504:** The section of the Rehabilitation Act that prohibits discrimination by any program or activity conducted by the federal government.

**Uniform Accessibility Standards (UFAS):** Accessibility standards that all federal agencies are required to meet; includes scoping and technical specifications.

**United States Access Board:** An independent federal agency that develops and maintains design criteria for buildings and other improvements, transit vehicles, telecommunications equipment, and electronic and information technology. It also enforces accessibility standards that cover federally funded facilities.

**United States Department of Justice (DOJ):** The United States Department of Justice (often referred to as the Justice Department or DOJ), is the United States federal executive department responsible for the enforcement of the law and administration of justice.