

Hennepin County ADA Transition Plan



Americans with Disabilities Act self-evaluation and transition plan for Hennepin County highway rights-of-way and Hennepin County Regional Railroad Authority rights-of-way

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Hennepin County
Public Works
hennepin.us



Hennepin County Board of Commissioners and Regional Railroad Authority Commissioners

Jeffrey Lunde, District 1

Irene Fernando, District 2

Marion Greene, District 3

Angela Conley, District 4

Debbie Goettel, District 5

Heather Edelson, District 6

Kevin Anderson, District 7

Primary contact

Transition Plan Engineer

transportationADA@hennepin.us

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Purpose and need

Hennepin County recognizes our public right-of-way as a valuable asset connecting people to jobs, schools, health care and other important destinations. Equitable access to transportation is fundamental to society and to a person's quality of life. This document serves as the Americans with Disabilities Act (ADA) Transition Plan for Hennepin County and the Hennepin County Regional Railroad Authority (HCRRRA).

Hennepin County is making significant progress in improving accessibility along our transportation system. In collaboration with our project partners, including cities, the Minnesota Department of Transportation (MnDOT), Metropolitan Council, park districts, developers and private utilities, the county will continue to work toward ensuring its transportation system is accessible for all people. The county aims to meet or exceed accessibility standards as new methods emerge, technologies are developed and opportunities arise. The county's transportation system is continually changing and improving through maintenance, preservation and modernization.

Purpose

The purpose of this ADA Transition Plan is to identify where infrastructure meets current standards or where modifications are needed. The county's self-evaluation process is used to develop a plan to remove accessibility barriers along the county transportation system and provide ADA-compliant access within county highway rights-of-way and HCRRRA corridors. The self-evaluation also includes a review of policies, practices and programs that affect accessibility and examines county implementation of these policies. This evaluation affirms policies and practices are consistent with Title II of the Americans with Disabilities Act and that the county supports the full participation of people with disabilities.

Need

The baseline of accessibility is compliance with Title II of the Americans with Disabilities Act, which requires an ADA Transition Plan. Hennepin County and HCRRRA are required to identify accessibility barriers and create a plan to address those barriers to comply with current standards. In accordance with 28 CFR 35.150(d)(3), ADA transition plans need to provide the following:

- Identification of physical obstacles to existing facilities
- Description of methods used to make the facilities accessible
- Schedule for compliance
- Official responsible for implementation

This Transition Plan evaluates how the county and HCRRRA's collective transportation system complies with the law, particularly for pedestrian ramps. The plan identifies accessibility needs and sets expectations for how and when Hennepin County will meet those needs. It includes an inventory of pedestrian facilities (ramps, signals, sidewalks and multiuse trails), including obstructions and defects, as well as county goals, policies and plans that promote accessibility. The county's plan also estimates the timeframe to reach full compliance based on current standards.

HCRRRA currently satisfies ADA compliance regulations as the entity does not operate or maintain any pedestrian infrastructure. Separate government agencies operate and maintain facilities within its right-of-way and are responsible for meeting compliance of those facilities.

County self-evaluation overview

Hennepin County mission and vision

This transition plan is driven by the county's mission and vision. It supports the value of people first and our commitment toward universal accessibility for our residents.

Mission

To serve residents through transformative services that reduce disparities, eliminate inequities and create opportunity for all.

Vision

A community where all people are healthy, all people are valued and all people thrive.

Relationship to county plans and policies

Hennepin County demonstrates a commitment to making our transportation facilities accessible through its overarching Comprehensive Plan and through the following supporting policies, plans and programs that were reviewed as part of the self-evaluation. These reviews ensure guiding principles and implementation through plans and programs are consistent with Title II of the Americans with Disabilities Act that support the full participation of people with disabilities.

Comprehensive plan

Hennepin County's transportation plan is a chapter within the county's comprehensive plan, which is updated every 10 years, and provides long-range guidance for the county's multimodal transportation system. It establishes a subset of supporting plans including the ADA Transition Plan, as well as multimodal and safety plans.

Complete and Green Streets Policy

Hennepin County adopted its current Complete and Green Streets Policy in 2023, with a vision to provide a safe transportation network that offers strong connections through multiple modes, respects the environment and improves the health and quality of life for all who live, work or visit here. Implementation of the Complete and Green Streets Policy enhances accessibility through an established modal priority framework that guides decisions along the county's transportation network.

Disparity elimination

Hennepin County has acknowledged a wide range of disparities interconnected with access to the transportation system and is committed to eliminating those disparities within the connectivity domain. Through policies, services and programs the county is working to ensure our technology, transit and transportation systems are accessible, affordable and climate friendly for all people.

Climate Action Plan

Hennepin County adopted a Climate Action Plan in 2021 that supports enhanced accessibility by outlining strategies to reduce greenhouse gas emissions, increase resiliency and adapt to the changing climate, including reducing motor vehicle miles traveled, advocating for and supporting transit and expanding multimodal facilities.

Age-Friendly Hennepin County

Age-Friendly Hennepin County supports the county's efforts to achieve health and racial equity and eliminate disparities by intentionally focusing on the critical dimension of aging. As older adults are significantly more likely than younger adults to have a disability, the Age-Friendly Hennepin Action Plan identifies strategies and actions that can be addressed with accessible infrastructure to serve the county's aging population.

Active Living Program

The Active Living program aims to create healthy, livable and people-centered communities where people can walk, bike and take transit to everyday destinations. Hennepin County launched this initiative in 2006 with the goal of integrating health with land use and transportation decision making. Active Living Hennepin County hosts workshops on various topics and provides support to cities on various strategies, policies and infrastructure. The program also provides funding and technical assistance to cities and local agencies for activities that improve walkability and bikeability.

Cost Participation and Maintenance Policies

Addressing accessibility in the county's transportation system requires partnerships and collaboration. Our Cost Participation and Maintenance Policies, adopted in 2020, outline financial responsibilities for the improvement and maintenance of roadway elements along the county's transportation system between MnDOT, cities and other agencies.

Current system assessment

Hennepin County transportation system

Hennepin County, at the core of the Twin Cities metropolitan area, has an area of 607 square miles with more than 1.2 million residents living in 45 cities. The county includes diverse land uses and communities with high density urban, growing suburbs and rural farm areas which are served by a range of multimodal facilities. The county has approximately 13,900 pedestrian ramps, 530 miles of sidewalks and multiuse trails and 800 traffic signals along our transportation system.

The Hennepin County Regional Railroad Authority (HCRRA) was established in 1980 as a separate political subdivision to plan and establish light rail transit and other local rail service and to preserve rail corridors for future transportation uses. HCRRA-owned corridors are currently used for multimodal transportation purposes. HCRRA does not construct or operate trails. It partners with the City of Minneapolis and Three Rivers Park District to operate and maintain trails, such as the Midtown Greenway in Minneapolis and the Dakota Rail Regional Trail that runs through seven cities in western Hennepin County. While HCRRA owns right-of-way, the pedestrian facilities along these corridors are maintained and operated by others.

Inventory of system accessibility

As part of the self-evaluation, pedestrian accessibility needs were identified along the county's transportation system. The county inventoried the pedestrian ramps, sidewalks, multiuse trails and traffic signals along the county roadway system to determine which need repair, modification or replacement to meet Americans with Disabilities Act requirements.

Pedestrian ramp and traffic signal data is reviewed and updated annually. Data related to sidewalks and multiuse trails was completed in the year 2019 and supplemented in 2023. Ramp conditions were determined based on the categories identified in Appendix B.

Nearly 60 percent of the pedestrian ramps along the county roadway system meet current standards, with 40 percent of the ramps needing modification. About 30 percent of the traffic signals include accessible pedestrian signal systems. The full inventory and evaluation results are provided in Appendix B.

An ongoing system assessment will be completed to continue to measure progress.

Public engagement

Before finalizing the plan, Hennepin County sought public input. This was accomplished by:

- Publishing and promoting an online survey (available May 23–June 30, 2025)
- Emailing people who requested updates on the ADA plan/accessibility topics (3,885 recipients)
- Notifying agencies, cities, and organizations (164)

We received 25 responses through this effort, which were incorporated into the plan or will be addressed through implementation and other efforts.

In compliance with 28 CFR 35.105, Hennepin County provides opportunities to interested parties, including people with disabilities or organizations representing people with disabilities, to participate in the self-evaluation and transition plan. Those wishing to participate further are encouraged to sign up for email notifications at hennepin.us/adaplan and/or submit comments by contacting the Transition Plan Engineer.

Transition plan

Since the ADA was enacted in 1991, the county has been working toward full compliance. Available funding and resources influences the time required to bring all facilities to full compliance. The nature, expense and complexity of infrastructure in the county right-of-way impacts the timing to address accessibility barriers. In addition, topography, land uses and buildings that constrain infrastructure can be difficult to change. Hennepin County's goal is to achieve systemwide pedestrian curb ramp compliance by 2040.

The county and our partner agencies plan and implement projects each year to maintain, preserve and modernize our transportation system. These projects include pavement preservation, rehabilitation and full reconstruction. In addition, multimodal, safety and traffic signal projects provide an opportunity to improve accessibility along our roadways.

For all projects, the county incorporates current accessibility guidance in accordance with applicable rules and regulations (see appendices C and D). Continuing to upgrade ramps to current standards and address missing ramps as part of these projects significantly contributes toward the county's full compliance.

Pavement preservation and rehabilitation

Hennepin County brings corridors into ADA compliance with pavement preservation projects, such as mill and overlay, and pavement rehabilitation activities, such as full depth reclamation and cold in place recycling. The county considers the pedestrian circulation route (PCR), which includes a pedestrian access route (PAR), within the context of existing infrastructure.

Roadway reconstruction

Hennepin County also brings corridors into ADA compliance during roadway reconstruction, with projects identified in Hennepin County's five-year Capital Improvement Program (CIP). As with pavement preservation and rehabilitation projects, the county considers the PCR and PAR within the context of existing infrastructure. In addition, local and regional planning documents and public input are considered to ensure the pedestrian access route is well planned and addresses the needs of the community.

Maintenance

Ongoing operations and maintenance of these assets is important to ensure facilities are ADA compliant year-round. Hennepin County's Cost Participation and Maintenance Policies identify maintenance responsibilities for assets along our transportation system. In addition, Hennepin County enters into construction cooperative agreements and has specific maintenance agreements with city partners to define who owns and maintains assets within the county's rights-of-way.

Work with partners

Hennepin County works with partner agencies, such as MnDOT, transit agencies, cities within Hennepin County and adjacent counties, to upgrade pedestrian infrastructure and remove obstructions, barriers and deficiencies. County staff coordinate with partner agencies on externally led projects and through utility and roadway permits within county right-of-way to upgrade facilities to current standards.

Grievance procedure

Under the Americans with Disabilities Act, users of Hennepin County facilities and services have the right to file a grievance if they believe Hennepin County has not provided reasonable accommodation. The grievance procedure in accordance with 28 CFR 35.107(b) can be found in Appendix A.

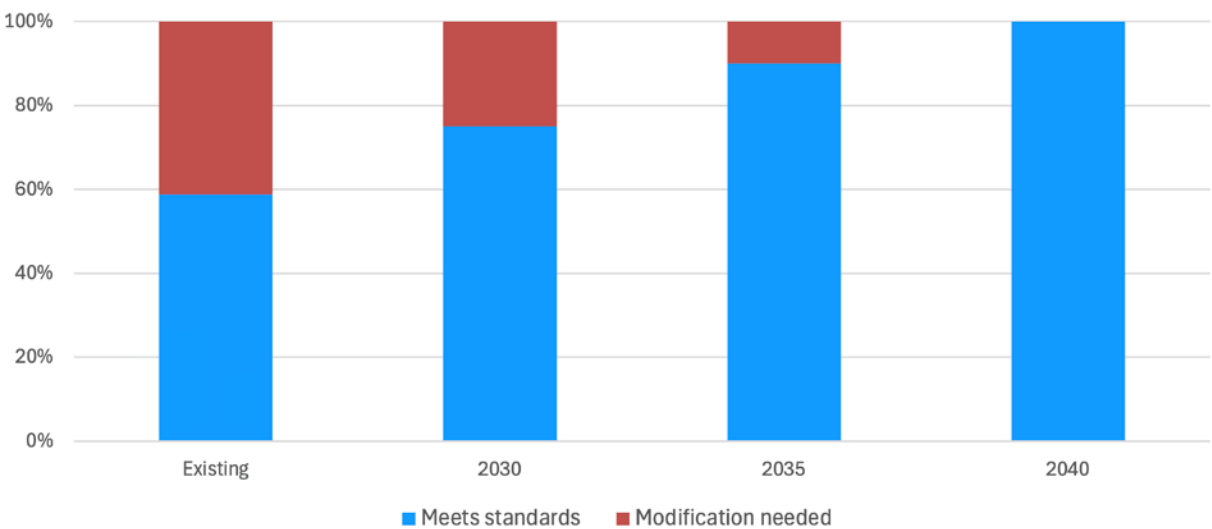
Implementation

Hennepin County is committed to improving accessibility on the county transportation system and within the county highway rights-of-way to meet current standards.

Based on a projection of county roadway improvement projects, it is estimated that the county will reach full ADA compliance for pedestrian ramps by the year 2040. The timeline for modification of the pedestrian ramps will depend on alterations to existing infrastructure, planned projects, funding and resources.

County roadway improvement projects will also upgrade sidewalks, multiuse trails and pedestrian signals when feasible and applicable. More detailed information regarding Hennepin County’s policy for the installation of Accessible Pedestrian Signals is provided in Appendix B. The county’s Cost Participation and Maintenance Policies includes further information regarding the maintenance of sidewalks and multiuse trails within county right-of-way.

Figure 1: Pedestrian ramps anticipated ADA compliance schedule



Plan implementers

Below is the contact information for the person responsible for implementing the ADA Transition Plan.

For updates visit: hennepin.us/adaplan.

Transition Plan Engineer

transportationADA@hennepin.us

Appendix A

How to file a grievance

The county has the following process for those wishing to file a formal grievance with Hennepin County. Formal grievances may be submitted by the following methods:

Online

formcatalog.hennepin.us/county_admin/human_resources/ada-grievance.html

Email

Contact Hennepin County's ADA Transition Plan Engineer, who will submit the grievance on behalf of the person filing it.

transportationADA@hennepin.us

Hennepin County self-evaluation inventory

Pedestrian infrastructure inventory

The county’s pedestrian infrastructure inventory includes pedestrian ramps, sidewalks and multiuse trails and Accessible Pedestrian Signals (APS) within county right-of-way. Hennepin County updates pedestrian ramp and APS data annually. The county inventoried sidewalks and multiuse trails in the years 2019 and 2023 to identify infrastructure that meets current standards and where modifications are needed.

The county’s self-evaluation inventory for signals, ramps, sidewalks and multiuse trails is provided in the interactive map online at hennepin.us/en/residents/transportation/ada-transition-plan.

The county routinely updates this data to reflect current conditions. All projects within county right-of-way incorporate current accessibility guidance in accordance with applicable rules and regulations. Maintenance for these assets is defined in the county’s

Cost Participation and Maintenance Policies.

Pedestrian ramps

Pedestrian ramps along county roadways were identified as one of four categories:

- Case 1 — Ramps meet current standards.
- Case 2 — Ramps met standards at the time of installation but may need modification based on current standards.
- Case 3 — Ramps needing modification including truncated domes, although the ramp does not appear to present a significant physical barrier for sighted pedestrians.
- Case 4 — Ramp is in need of modification.

Table B-1 provides results from the pedestrian ramp inventory in county highway rights-of-way at the time of plan adoption. As pedestrian ramps may degrade over time, the condition of these ramps is subject to change.

Table B-1: Pedestrian ramp inventory

| | Ramps | Meets standards | Modification needed |
|--------|--------|-----------------|---------------------|
| Case 1 | 7,386 | 7,386 | 0 |
| Case 2 | 2,335 | 771 | 1,564 |
| Case 3 | 4,090 | 0 | 4,090 |
| Case 4 | 64 | 0 | 64 |
| Total | 13,875 | 8,157 | 5,718 |

Accessible Pedestrian Signals (APS)

An Accessible Pedestrian Signal (APS) communicates information about pedestrian signal timing in a non-visual format such as audible tones, speech messages and/or vibrating surfaces. An example of APS is shown in Figure B-1.

Figure B-1: Accessible Pedestrian Signal



The county implements APS to current standards with applicable projects. This is generally completed with the installation of new or modified traffic signal systems, when the modification includes below-grade work requiring excavation and at intersections including pedestrian elements (countdown timers, crosswalks, pedestrian indicators, pedestrian ramps, sidewalk/trail, etc.). Several factors may increase the timing to install APS, including customized equipment, product delivery, upgrades to signal controller hardware, installation of electrical conduits and pedestrian ramp construction.

The traffic signals along county roadways are inventoried to determine the number of APS devices. This information is updated as traffic signals are modernized, installed or replaced. Table B-2 illustrates the APS inventory, with more information provided in the county's interactive ADA transition plan map provided on the county's website at hennepin.us/adaplan.

Table B-2: Accessible Pedestrian Signal inventory

| Traffic signals | With APS | Without APS |
|-----------------|----------|-------------|
| 808 | 269 | 539 |

Sidewalks and multiuse trails

Sidewalks and multiuse trails with defects or obstructions can impact accessibility for people. For more information on the condition of these facilities see the county's interactive ADA transition plan map on the county's website at hennepin.us/adaplan.

Americans with Disabilities Act rules, design guidance and best practices

Public Right-of-Way Accessibility Guidelines

Public Right-of-Way Accessibility Guidelines (PROWAG), developed by the United States Access Board, are guidelines that address accessibility in the public rights-of-way. Sidewalks, street crossings and other elements of the public right-of-way present unique challenges to accessibility for which specific guidance is essential.

The Access Board develops these guidelines to address various issues, including access for visually impaired pedestrians at street crossings, wheelchair access to on-street parking and various constraints posed by space limitations, roadway design practices, slope and terrain.

The Access Board issued its final rule on August 8, 2023. The U.S. Department of Transportation published its Final Rule for PROWAG on December 18, 2024. The U.S. Department of Justice still needs to publish its Final Rule. Once published, these guidelines will be mandatory for accessibility design within public rights-of-way.

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

This report and its recommendations are the work of the Public Rights-of-Way Access Advisory Committee (PROWAAC) — Subcommittee on Technical Assistance and are intended to provide technical assistance only. The report is not a rule and has no binding effect. It has not been endorsed by the U.S. Access Board, the Department of Justice or the Federal Highway Administration of the Department of Transportation. Still, it can be a technical advisory source for engineers and technicians who are planning and designing for alterations to pedestrian elements.

Minnesota Department of Transportation

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

The MnDOT Accessibility webpage, which has information in several subject areas related to accessibility, is at dot.state.mn.us/ada. The webpage also provides an option to sign up for accessibility policy and design training classes when available and to review material from previous trainings.

Curb Ramp Guidelines:
dot.state.mn.us/ada/pdf/curbramp.pdf

ADA Project Design Guide Memo:
dot.state.mn.us/ada/pdf/adaprojectdesignguidememo.pdf

ADA Project Design Guide:
dot.state.mn.us/ada/pdf/adaprojectdesignguide.pdf

Pedestrian Curb Ramp Details Standard Plans 5-297.250: dot.state.mn.us/ada/pdf/5-297-250.pdf

MnDOT's 7000 Series Standard Plates, which are approved standards drawings, provide information on standard details of construction and materials related to curbs, gutters and sidewalks: dot.state.mn.us/design/design-standards/standard-plates.html

Appendix C, continued

The MnDOT Facility Design Guide serves as a uniform design guide for engineers and technicians working on MnDOT projects. The document is a technical resource. The Facility Design Guide is at dot.state.mn.us/design/design-standards/facility-design-guide.html

MnDOT's Temporary Pedestrian Access Route (TPAR) webpage provides guidance on maintaining accessibility during maintenance or construction activities: dot.state.mn.us/trafficeng/workzone/apr.html

Additional accessibility laws and guidance

Architectural Barriers Act of 1968 (ABA)

The Architectural Barriers Act of 1968 (ABA) is a federal law requiring that facilities designed, built, altered or leased with United States Federal Government funds are accessible. The ABA marks one of the first efforts to ensure accessibility to buildings and facilities.

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 28 of the Code of Federal Regulations Part 35

Title 28 of the Code of Federal Regulations Part 35 implements Subtitle A of Title II of the Americans with Disabilities Act of 1990, which prohibits discrimination based on disability by public entities. 28 CFR Part 35, titled “Nondiscrimination on the Basis of Disability” in state and local government services, also provides guidance to local agencies such as Hennepin County to comply with the ADA. These rules direct the county on items such as establishing a grievance procedure, designating a responsible official, performing a self-evaluation and writing a Transition Plan.

¹ Title III of the ADA is the section of the law that applies to public accommodations, commercial facilities, and private entities offering certain examinations and courses. Although included in the ADAAG, Title III offers no guidance to nor provides any requirements to Hennepin County in the context of its public rights-of-way.

2010 ADA Standards for Accessible Design

In 2010, the Department of Justice published revised regulations for Titles II and III of the Americans with Disabilities Act of 1990. These regulations adopted revised, enforceable accessibility standards called the 2010 ADA Standards for Accessible Design.

The 2010 Standards set minimum requirements — both scoping and technical — for newly designed and constructed or altered state and local government facilities, public accommodations and commercial facilities to be readily accessible to and usable by people with disabilities.

Americans with Disabilities Act Accessibility Guidelines (ADAAG)

The ADA Accessibility Guidelines (ADAAG) document contains scoping and technical requirements for accessibility to buildings and facilities under the Americans with Disabilities Act. These scoping and technical requirements are to be applied during the design, construction and alteration of buildings and facilities covered by Titles II and III¹ of the ADA.

U.S. Access Board

The United States Access Board is an independent federal agency devoted to accessibility. Created in 1973 to ensure access to federally funded facilities, the U.S. Access Board is a leading source of information on accessible design. The Access Board is structured to function as a coordinating body among federal agencies and to directly represent the public, particularly people with disabilities. Half of its members are representatives from federal departments. The other half are members of the public appointed by the president; a majority of these members must have a disability.

Minnesota Olmstead Plan

The Minnesota Olmstead Plan was developed by the state in response to the United States Supreme Court Olmstead v. L.C. decision (ada.gov/olmstead/olmstead_about). The plan documents how the state will provide services to people with disabilities in the most integrated setting appropriate to the person, as required by the Olmstead decision.

When the state develops policies, such as transportation policy, those policies must support integration and inclusion of people with disabilities. The Transition Plan provides infrastructure in a way that is integrative and inclusive for all, including people with disabilities.



Hennepin County

Public Works

300 South 6th Street, Minneapolis, MN 55487

hennepin.us