

January 13, 2010

**Commissioner Thomas Sorel
Minnesota Department of Transportation
395 John Ireland Blvd. – M.S. 500
St. Paul, MN 55155
Attention: ADA Transition Plan**

Re: Comment on the December 2009 draft of the ADA Transition Plan

Dear Commissioner Sorel:

The draft ADA Transition Plan is a very important step toward ensuring safe access for all Minnesotans. We commend Mn/Dot for the willingness to start the process of identifying needs related to ADA and to begin addressing those needs.

Thank you for the opportunity to offer comments about the Transition Plan. We look forward to working with Mn/DOT toward implementing the Plan and on other interconnected initiatives such as Complete Streets.

General Comments

We are very glad that Mn/DOT has prioritized ADA, and is taking proactive steps to address the issues. The recent adoption of PROWAG standards is an important step, as is the commitment to complete a thorough self evaluation in 2010. It would be valuable to include a vision for ADA as part of the Transition Plan to help clarify that Mn/DOT's work on ADA goes beyond simply meeting federal requirements to core goals of the agency to improve access, mobility, and equity.

It is really important moving forward that ADA is incorporated into any construction, reconstruction, and rehabilitation project. The

Transition Plan should more explicitly state that ADA will be implemented on all projects down to the mill and overlay level. The plan should also explicitly discuss the process for prioritizing future ADA retrofits that come once the self evaluation is finished. This process should include public input throughout, especially from the disability community.

We encourage Mn/DOT to prioritize ADA projects in any near-term second federal “stimulus” package to take advantage of the opportunity to address critical issues toward ADA compliance.

We also encourage Mn/DOT to connect work toward ADA compliance and Complete Streets wherever possible. ADA-related retrofits can in many cases provide an opportunity to improve safety and access not only for people with disabilities, but also for pedestrians and other users. Similarly, work toward Complete Streets should maximize the value for ADA compliance.

Before embarking on an important round of curb ramp retrofit investments, Mn/DOT should reexamine its Standard Plate for curb ramps. The benefits of two separate curb ramps certainly outweigh the incremental cost of the initial construction and a single standard will provide a more uniform travel environment for people with disabilities.

Specific Comments

- 1. PROWAG should be spelled out and explained briefly when it is introduced on page 3. The document should also be generally reexamined for other similar clarifications that could help make the document easier to follow for audiences that are not thoroughly versed in ADA.**
- 2. The timeline for identifying a point of contact for ADA issues in each district should be listed (page 5).**

3. Related to rest areas, the document should specifically mention the state accessibility requirements are more restrictive than ADAAG (page 7).
4. The plan should also address ADA issues for all bridges, not just pedestrian bridges and underpasses. Our bridges are critical for mobility for people with disabilities. There should also be more discussion of the process and timeline for prioritizing and completing needed pedestrian bridge replacement (page 10).
5. The Maintenance section on page 10 should be expanded to include specifics on the goals for the review of maintenance policies. Maintenance is another area where there is considerable overlap with Complete Streets, so the ADA work should be done in concert with efforts to evaluate maintenance issues related to Complete Streets.
6. Training is extremely important to ensure the ongoing implementation of ADA. In addition to the internal training mentioned in the plan, local training opportunities should be expanded and their role addressed. Mn/DOT is certainly the state expert on ADA compliance, and it is important they help build the expertise of local engineers as well. Training provides another potential synergy with the work on Complete Streets.

Thank you for your consideration. We look forward to seeing the results of this important work related to ADA.

Sincerely,
Lynne Bly
Transportation Policy Director
Fresh Energy