



**Summary of Annual Progress (2021): ADA Transition Plan for Public Right-of-Way Pedestrian Facilities**

The City’s ADA Transition Plan for Accessibility of Pedestrian Facilities in the Public Right-of-Way, dated March 30, 2018, included a self-evaluation of pedestrian facilities and prioritization strategy for making accessibility improvements in the public right-of-way. This update will include progress made in 2021 on overall accessibility, as well as projects specifically related to the Letter of Finding (LOF) issued by the Federal Highway Administration, South Dakota Division (FHWA) and the City’s proposed Correction and Implementation Plan for LOF Recommendation 4.

**Progress on Correction and Implementation Plan for LOF Recommendation 4**

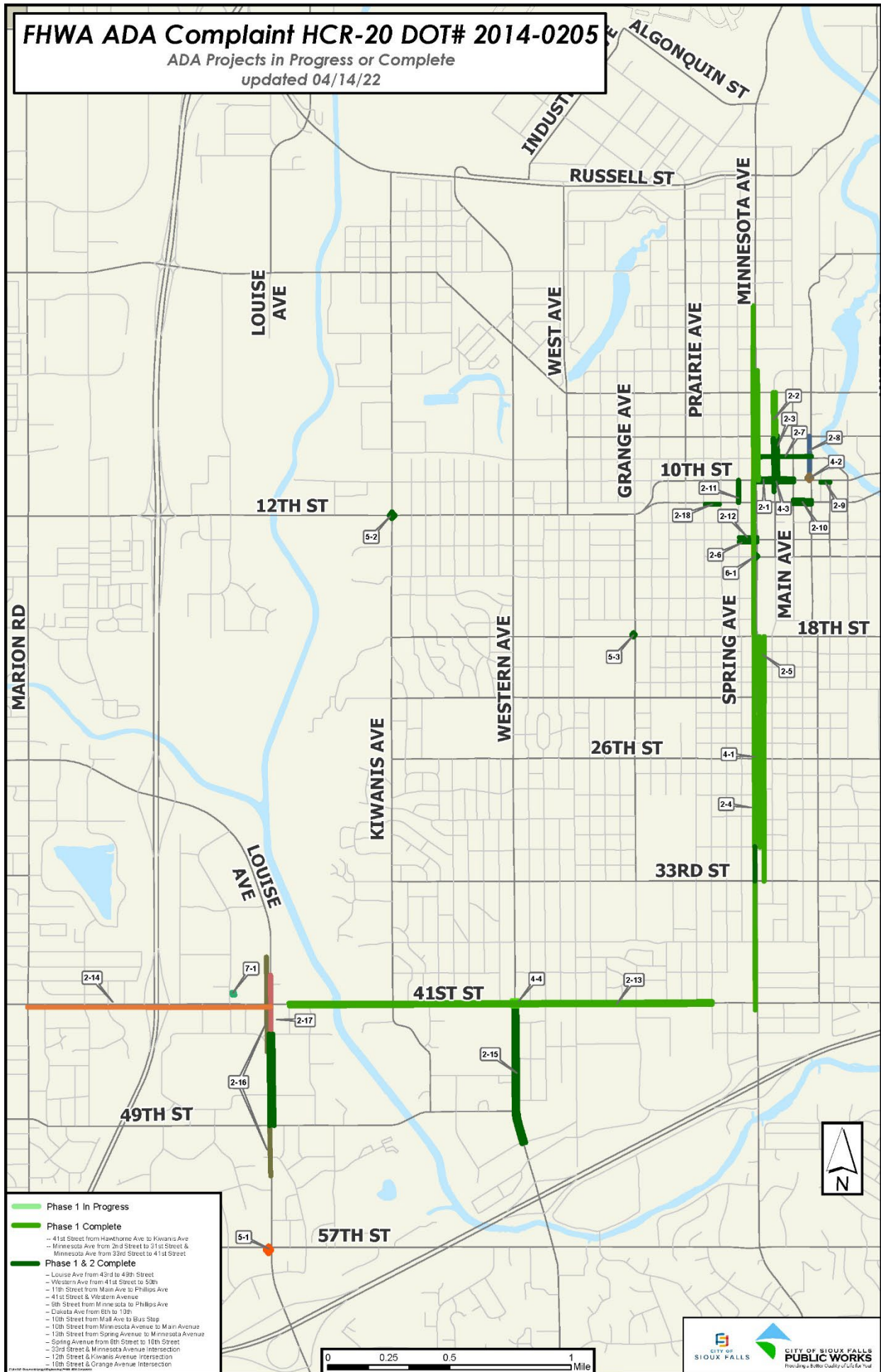
In 2021, Priority 1 repairs (consisting of ADA curb ramps at intersection corners) and Priority 2 repairs (consisting of out-of-compliance sidewalk) were made on the following segments:

2021					
Issue # - Location #	Location Description	Priority 1	Priority 2	Total	Comment
Part of 2 - 4 & 5	Finish Minnesota Segment around 33rd (Ulteig)	\$69,425	\$84,580	\$154,005	Priority 1 and 2 upgrades complete.
2 - 1	10th Street from Minnesota Ave to Main Ave	\$0	\$189,000	\$189,000	Priority 1 and 2 upgrades complete.
2 - 11	Spring Ave from 8th St to 10th St	\$71,500	\$136,500	\$208,000	Priority 1 and 2 upgrades complete.
2 - 18	11th Street from Summit Ave to Duluth Ave	\$0	\$37,000	\$37,000	Priority 1 and 2 upgrades complete.
2 - 6 & 12	13th Street from Spring Ave to Minnesota Ave	\$0	\$41,500	\$41,500	Priority 1 and 2 upgrades complete.
5 - 2	Intersection of 12th Street and Kiwanis Avenue	\$54,500	\$0	\$54,500	Priority 1 and 2 upgrades complete.
5 - 3	Intersection of 18th Street and Grange Avenue	\$48,000	\$0	\$48,000	Priority 1 and 2 upgrades complete.
	2021 Construction Administration	N/A	N/A	\$77,254	
	Design for 2022 Improvements	N/A	N/A	\$73,566	
				<b>\$882,825</b>	<b>\$1,034,000 was originally planned</b>

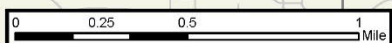
A map summarizing progress on LOF Recommendation 4 is included on the following page. The full updated version of the Correction and Implementation Plan for LOF Recommendation 4 follows the map. The original plan identified a \$1,034,000 investment on Recommendation 4 improvements in 2021 and the City invested \$882,825. The total invested for 2021 is lower than planned due to projects moving between years to coordinate with other projects as well as project estimates changing. **It is worth noting that from 2017-2021 the City has invested \$534,881 more than the original funding commitments in the plan.** Because bids have continually come in above original estimates and funding levels, an additional year was added to complete the plan. Additionally, projects have been moved to different years within the plan to better coordinate with Capital Improvement Program (arterial street) or State Transportation Improvement Program (interstate interchange) projects.

# FHWA ADA Complaint HCR-20 DOT# 2014-0205

ADA Projects in Progress or Complete  
updated 04/14/22



- Phase 1 In Progress
- Phase 1 Complete
  - 41st Street from Hawthorne Ave to Kiwanis Ave
  - Minnesota Ave from 2nd Street to 31st Street & Minnesota Ave from 33rd Street to 41st Street
- Phase 1 & 2 Complete
  - Louise Ave from 43rd to 49th Street
  - Western Ave from 41st Street to 50th
  - 11th Street from Main Ave to Phillips Ave
  - 41st Street & Western Avenue
  - 9th Street from Minnesota to Phillips Ave
  - Dakota Ave from 6th to 10th
  - 10th Street from Main Ave to Bus Stop
  - 10th Street from Minnesota Avenue to Main Avenue
  - 18th Street from Spring Avenue to Minnesota Avenue
  - Spring Avenue from 8th Street to 10th Street
  - 33rd Street & Minnesota Avenue Intersection
  - 12th Street & Grange Avenue Intersection
  - 10th Street & Grange Avenue Intersection



**Correction and Implementation Plan for Recommendation 4,  
FHWA Letter of Finding (LOF) for HCR-20 DOT# 2014-0205, as revised**

**Highlights indicate revisions  
to plan since 6/30/17 Memo**

2017				
Issue # - Location #	Location Description	Priority 1	Priority 2	Total
Part of 2 - 4 & 5	Minnesota Avenue 18th Street to 22nd Street	\$121,428		\$121,428
Part of 2 - 16 & 17	S. Louise Avenue from 43rd Street to 49th Street	\$68,740	\$269,520	\$338,260
Part of 2 - 2 & 3 and 4 - 3	S. Dakota Avenue from 6th St to 8th Street	\$27,845		\$27,845
	Design for 2018 ADA Improvements	N/A	N/A	\$63,504
				<b>\$541,037</b>

Completed, asbuilt cost  
Completed, asbuilt cost  
Completed, asbuilt cost  
final cost

**was \$646,000**

2018				
Issue # - Location #	Location Description	Priority 1	Priority 2	Total
Part of 2 - 4 & 5	Minnesota Avenue 22nd Street to 33rd Street	\$199,653		\$199,653
Part of 2 - 4 & 5	Minnesota Avenue from 33rd Street to 41st Street	\$87,055		\$87,055
Part of 2 - 4 & 5 (including Issue 6)	Minnesota Ave from 10th Street to 7th Street	\$50,898		\$50,898
2 - 13	W. 41st Street from Louise Ave to Kiwanis Ave	\$147,098		\$147,098
2 - 13	W. 41st Street from Western Ave to Minnesota Ave	\$309,866		\$309,866
	Design for 2019-2020 ADA Improvements	N/A	N/A	\$125,920
				<b>\$920,490</b>

Substantially completed, asbuilt cost, remaining ramps reprogrammed. \*\*  
divided segment, moved from 2019; Partially completed, asbuilt cost, remaining ramps reprogrammed \*\*

added; ramps completed before overlay  
divided due to pavement condition; completed, asbuilt cost

Substantially completed, asbuilt cost, remaining ramps reprogrammed.

current cost

**was \$662,000**

\*\* Work on 2018 Recommendation 4 projects on 41<sup>st</sup> Street and Minnesota Ave stopped for the year. Work was completed on 63 intersection corners, but all work was not completed due to weather, right-of-way, property owner and utility issues that occurred during design and construction. The 17 ramps not completed will be included in future Recommendation 4 projects.

2019				
Issue # - Location #	Location Description	Priority 1	Priority 2	Total
2 - 13	W. 41st Street from Kiwanis Ave to Western Ave	\$129,682		\$129,682
2 - 15	S. Western Avenue from 41st St to 50th St	\$179,424	\$344,882	\$524,306
2 - 10	11th Street from Main Ave to Phillips Ave	\$0	\$81,454	\$81,454
Part of 2 - 4 & 5 (including Issue 6)	Minnesota Avenue from 2nd Street to 7th Street	\$167,152		\$167,152
Part of 2 - 4 & 5 (including Issue 6)	Minnesota Avenue from 11th Street to 18th Street	\$140,752		\$140,752
	Design for 2020-2021 ADA Improvements	N/A	N/A	\$74,774
				<b>\$1,118,120</b>

divided due to street condition, moved from 2018

moved from 2021

moved from 2020; Phase 1 completed with previous Road Diet project.

added; ramps completed before overlay

added; ramps completed before overlay

current cost; add CA above

**was \$931,000**

2020				
Issue # - Location #	Location Description	Priority 1	Priority 2	Total
Part of 2-13 and 4-4	Intersection of 41st Street & Western Avenue (RSI)	\$49,235	\$121,213	\$170,448
Parts of 2 - 4, 5 & 13	Finish Minnesota/41st Segment	\$115,067		\$115,067
2 - 7	9th Street from Minnesota Ave to Phillips Ave	\$21,400	\$184,000	\$205,400
Part of 2 - 2 & 3 and 4 - 3	S. Dakota Avenue from 6th St to 8th Street		\$124,500	\$124,500
Part of 2 - 2 & 3 and 4 - 3	S. Dakota Avenue from 8th Street to 10th Street	\$144,600	\$193,400	\$338,000
2 - 9	10th Street from Mall Ave to Bus Stop	\$11,137	\$71,437	\$82,574
	2020 Construction Administration	N/A	N/A	\$103,643
	Design for 2021-2022 ADA Improvements	N/A	N/A	\$71,778
				<b>\$1,211,410</b>

moved from 2019 due to high bids

completed remaining Phase 1

Phase 1 and 2 completed

Phase 1 and 2 completed

Phase 1 and 2 completed

Parking Ramp and Bus Stop Projects

JSA

approved agreement

**was \$866,000**

2021				
Issue # - Location #	Location Description	Priority 1	Priority 2	Total
Part of 2 - 4 & 5	Finish Minnesota Segment around 33rd (Ulteig)	\$69,425	\$84,580	\$154,005
2 - 1	10th Street from Minnesota Ave to Main Ave	\$0	\$189,000	\$189,000
2 - 11	Spring Ave from 8th St to 10th St	\$71,500	\$136,500	\$208,000
2 - 18	11th Street from Summit Ave to Duluth Ave	\$0	\$37,000	\$37,000
2 - 6 & 12	13th Street from Spring Ave to Minnesota Ave	\$0	\$41,500	\$41,500
5 - 2	Intersection of 12th Street and Kiwanis Avenue	\$54,500	\$0	\$54,500
5 - 3	Intersection of 18th Street and Grange Avenue	\$48,000	\$0	\$48,000
	2021 Construction Administration	N/A	N/A	\$77,254
	Design for 2022 Improvements	N/A	N/A	\$73,566
				<b>\$882,825</b>

13 intersection corners

Phase 1 and 2 completed; moved from 2020

Phase 1 and 2 completed; moved from 2020

Phase 1 and 2 completed; moved from 2020

Phase 1 and 2 completed; moved from 2020

Phase 1 and 2 completed; moved from 2020

Phase 1 and 2 completed; moved from 2020

JSA

approved agreement

**was \$1,034,000**



2022					
Issue # - Location #	Location Description	Priority 1	Priority 2	Total	
Part of 2 - 4 & 5 (including Issue 6)	Minnesota Ave from Russell Street to 2nd Street	\$147,905	\$311,257	\$459,162	added; hopefully 2022 segment is adjacent to complaint; bid
Part of 2 - 4 & 5 (including Issue 6)	Minnesota Avenue from 33rd Street to 41st Street		\$1,100,000	\$1,100,000	in design; moved from 2023; added 25% to estimate
	2022 Construction Administration	N/A	N/A	\$110,000	est
	Design for 2023 Improvements	N/A	N/A	\$80,000	est
				<b>\$1,749,162</b>	<b>was \$1,445,000</b>

2023					
Issue # - Location #	Location Description	Priority 1	Priority 2	Total	
Part of 2 - 8 and 4 - 2	Phillips Avenue from 8th St to 9th St	\$21,000	\$72,000	\$93,000	project schedule changed; moved from 2019
Part of 2 - 8 and 4 - 2	Phillips Avenue from 9th St to 10th St	\$21,000	\$72,000	\$93,000	project schedule changed; moved from 2019
Part of 2 - 13	W. 41st Street from Western Ave to Minnesota Ave		\$1,090,000	\$1,090,000	in design; moved from 2022; added 25% to estimate
Part of 2 - 14 and 7 - 1	41st Street from Marion Road to Shirley Ave, including Shirley Ave	\$125,000	\$400,000	\$525,000	part of City/SDDOT I-29 and 41st Street project
	2023 Construction Administration	N/A	N/A	\$109,000	est
	Design for 2024 Improvements	N/A	N/A	\$80,000	est
				<b>\$1,990,000</b>	<b>was \$2,375,000</b>

2024					
Issue # - Location #	Location Description	Priority 1	Priority 2	Total	
Part of 2 - 4 & 5	Minnesota Avenue 18th Street to 22nd Street		\$560,000	\$560,000	moved from 2023; added 25% to estimate
Part of 2 - 4 & 5	Minnesota Avenue 22nd Street to 33rd Street		\$700,000	\$700,000	moved from 2023; added 25% to estimate
Part of 2 - 4 & 5 (including Issue 6)	Remainder of Minnesota Avenue from 41st St to 2nd St, excluding 18th Street to 33rd Street	\$300,000	\$987,000	\$1,287,000	revised based on Minnesota Reconstruction
	2024 Construction Administration	N/A	N/A	\$126,000	est
	Design for 2025 Improvements	N/A	N/A	\$100,000	est
				<b>\$2,773,000</b>	<b>was \$1,400,000</b>

2025					
Issue # - Location #	Location Description	Priority 1	Priority 2	Total	
Part of 2 - 14 and 7 - 1	41st Street from Shirley Ave to Louise Avenue	\$125,000	\$350,000	\$475,000	added year due to increasing costs; budgets
Part of 2 - 16 & 17	Remainder of S. Louise Avenue from Bus Station to 49th St. and 41st Street to Walmart	\$76,000	\$380,000	\$456,000	separated segment and moved from 2023
5 - 1	Intersection of 57th Street and Louise Avenue	\$36,000	\$0	\$36,000	moved from 2021
Part of 2 - 13	W. 41st Street from Louise Ave to Western Ave		\$573,000	\$573,000	moved from 2022
				<b>\$1,540,000</b>	

**Total Investment 2017-2025      \$12,726,000      was \$9,359,000**

## Progress on Transition Plan Priorities

As outlined in the transition plan, the following table shows progress on each accessibility priority:

Priority	Existing Situation/ Accessibility Issue	2017 Number of Non-Compliant Locations [1]	Target Date for Completion [2]	..	2020 Number of Non-Compliant Locations	2021 Number of Non-Compliant Locations
1	Non-operational push buttons	84	2 years		2	0
2	Vertical curb barriers (with no curb ramps) at locations with existing sidewalk crossings.	186	3 years		86	48
3	Curb ramps in poor condition <60 condition rating	277	5 years		18	18
4	Push buttons with height less than 15" and more than 48"	124	5 years		104	91
5	Push buttons with reach distance over 25"	77	5 years		67	62
6	Clear ground space at pedestrian push buttons with size less than 30"x48" or where none was identified	88	7 years		68	67
7	Pedestrian pushbuttons with low compliance rating <60	96	10 years		64	61
8	Vertical faults on sidewalks and curb ramps	16,013	15 years		14,136	13,695
9	Obstructions present on curb ramps and sidewalks (remove or mitigate)	687 [3]	15 years		590	579
10	Curb ramps with low compliance rating <60	1,682	20 years		1452	1,360
11	Excessively non-compliant driveways and sidewalk segments with excessive cross slope	1,013 [4]	20 years		998	976

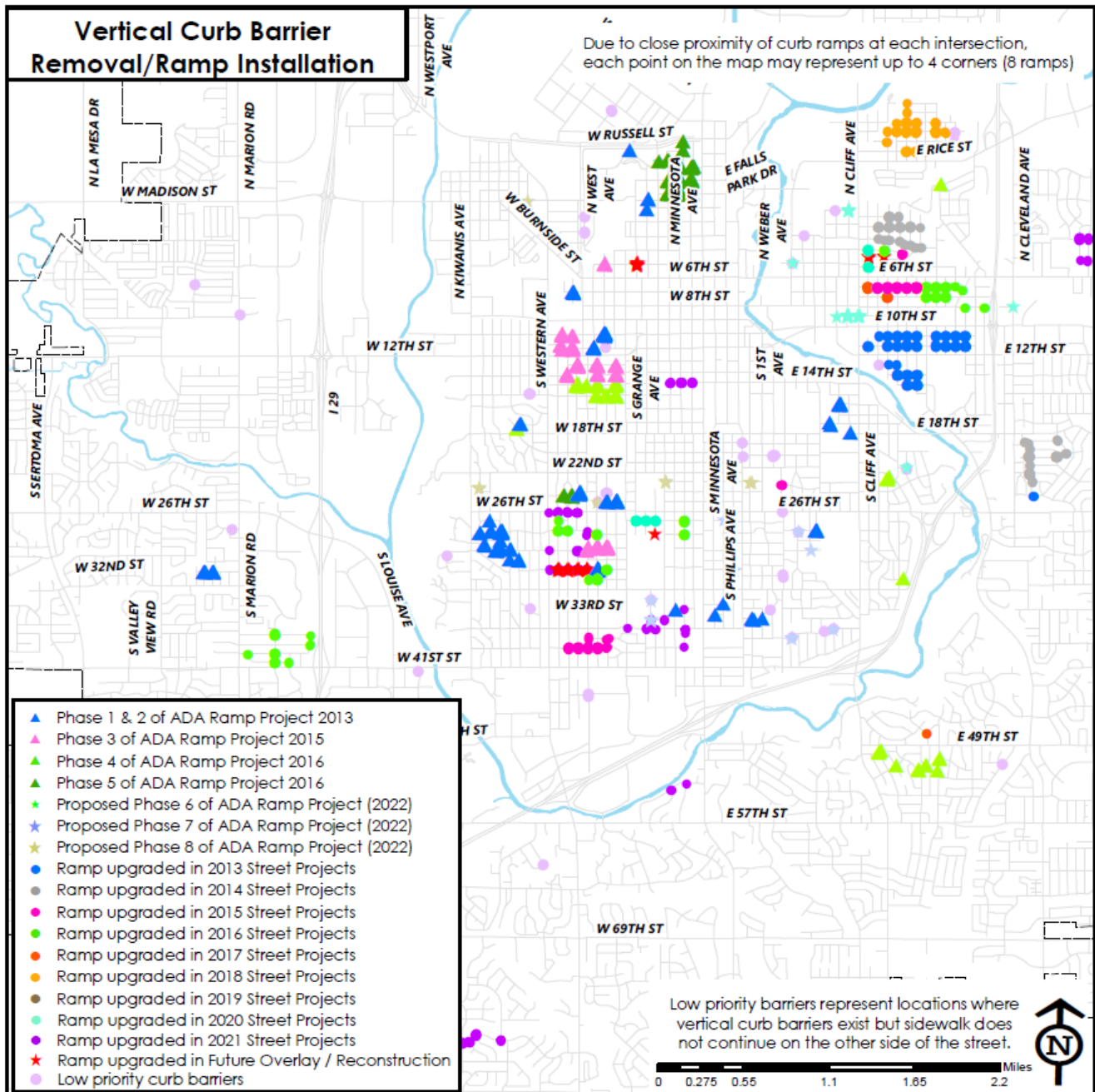
[1] As identified in the self-evaluation inventory, count may overlap in other categories. Consideration also given to adjacent non-compliant facilities. Non-compliant facilities could include curb ramps, sidewalks, and pedestrian buttons. Detail on priorities 1-7 are attached in expanded tables.

[2] The target date for completion began at the point of implementation of the transition plan, March, 30, 2018. The date in this column represents an estimate of when the prioritized accessibility issues will be fixed.

[3] The number of curb ramp obstructions in 2017 was originally reported as 582, but should have been 687.

[4] The number of excessively non-compliant driveways in 2017 was originally reported as 1,002, but should have been 1,013.

The following map has been used to show progress on vertical curb barriers (Priority #2) since 2013. The map does not include ramps upgraded that were not vertical curb barriers to begin with.



### Investments in Pedestrian Facilities

Investments in new and upgraded pedestrian facilities within the public right-of-way were tracked to show the type and amount of investment the City is making in specific areas. Funding categories include:

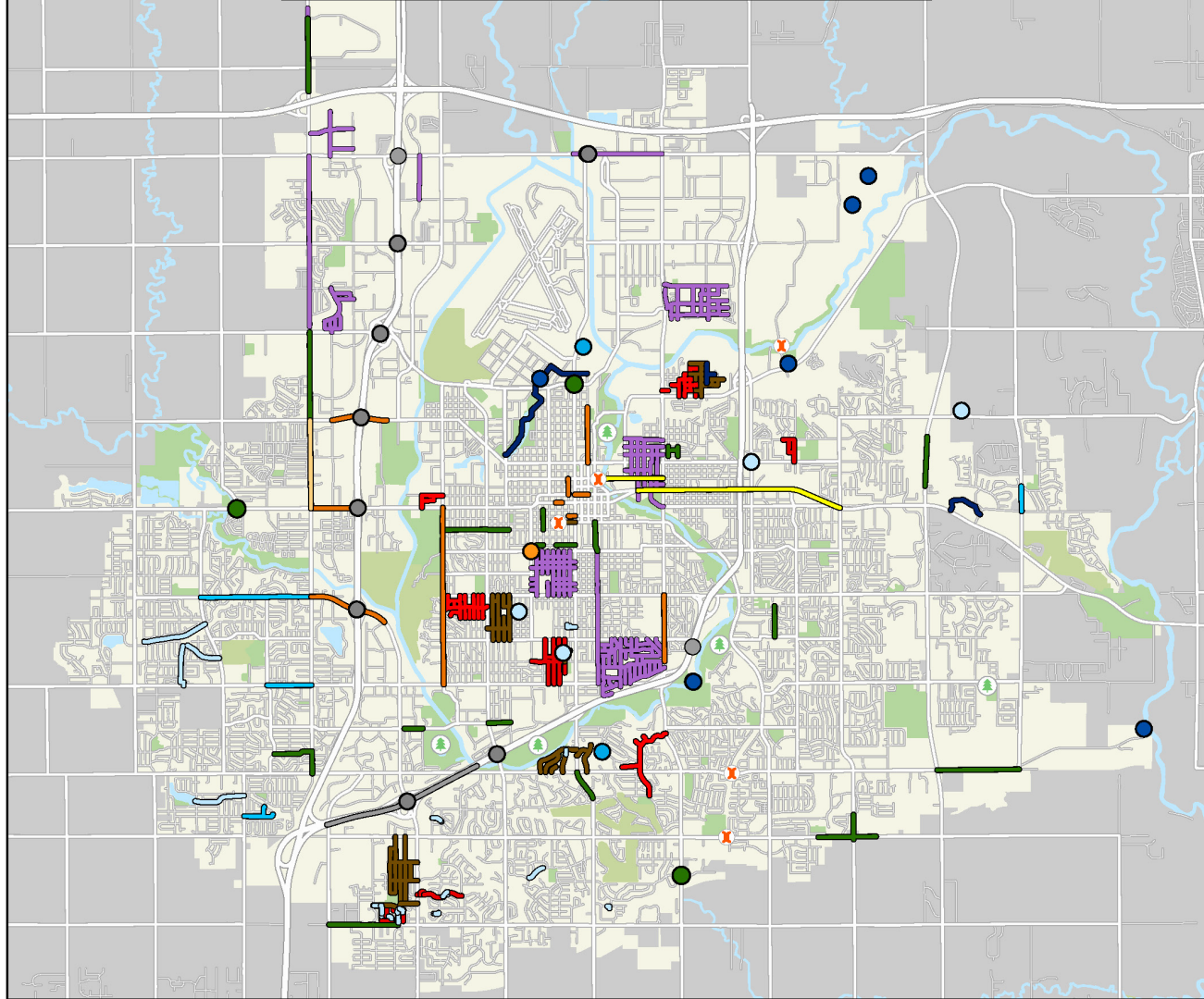
- New Ramps (installed as a part of street network expansion projects where there was not previously a sidewalk or ramp)
- Reconstructed Ramps (installed as a part of City alteration or reconstruction projects)
- New and reconstructed pedestrian push buttons
- Sidewalk (New and reconstructed sidewalk on City projects)
- Pedestrian Bridge (funds associated with installation of a pedestrian bridge and new paths and connections in Rotary Park)
- Note: Funds for ADA upgrades associated with the complaint area (and detailed earlier in the memo) are not included in the categories below.

2021 Investments in New and Upgraded Pedestrian Facilities (Not including funds spent on Correction and Implementation Plan for LOF Recommendation 4)				
Push Buttons (New/Reconstructed)	Sidewalk (New/Reconstructed)	Reconstructed Ramps	New Ramps	Pedestrian Bridge
\$277,501.49	\$1,576,506.28	\$867,379.35	\$47,698.29	\$216,493.77

Adding all of the pedestrian facility investments above, and improvements made in the complaint area, the City invested **over \$3.8 in pedestrian facility improvements in 2021.**

The following map shows the City’s 2021 Capital Improvement Projects, which included ADA upgrades as needed.

# 2021 Asbuilt Capital Improvement Projects



## Transportation Projects

- Major Street Reconstruction / Expansion
- Neighborhood Reconstruction
- Bridge
- Concrete Joint Resealing
- Concrete Repair

- 77th Street and Cliff Avenue Intersection (Traffic Signal)
- 12th St and LaMesa Drive Intersection (Traffic Signal)
- Minnesota Avenue & Russell Street Intersection
- 69th Street and Sycamore Ave Improvements
- 33rd Street & Minnesota Ave Reconstruction
- Marion Road Improvements N of I-90 to Foundation Court
- Marion Road: 41st Street to South of 57th Street (Overlay)
- Marion Road: Madison St to Maple St (Joint Resealing)
- Marion Road: 12th Street to Madison Street
- Minnesota Ave: 57th St to St. Andrews Dr
- I-29 Interchanges Joint Repair: 12th Street, 26th Street, Madison Street
- Kiwanis Ave: 12th Street to 41st Street
- Various Intersection ADA Improvements
- 57th Street: Veterans Parkway to Six Mile Road (grading)
- 49th Street: Western Ave to West Ave
- 49th Street: Arway Dr to Oxbow Ave
- Veterans Parkway: 6th St to Madison St
- Phillips Ave: 14th St to 18th S
- Walts Ave: 12th St to 15th St & 17th Street: Menlo Ave to Walts Ave
- 17th St: Minnesota Ave to Summit Ave
- Highland Neighborhood Improvements Phase 2
- Alley Drainage NE of 31st St & Duluth Ave and 31st Street from Duluth Ave to Minnesota Ave Overlay
- 85th Street: Hughes Ave to Tallgrass Ave
- Bridges: 8th St, 57th St, 69th St, and Summit Ave/15th Street
- Bluestem Street: Holbrook Ave to Marion Rd (Water Driven)
- Holt Ave: 28th St to 33rd St (Water Driven)
- Sherman Ave: Walnut St to Bennett St (Sanitary Driven)
- Lewis Ave: Spruce St to Russell St & Walnut St: Lewis Ave. to St. Paul Ave. (Sanitary Driven)
- 15th Street Bike Route Improvements

## State Projects

- I-229 Mill and Overlay: Exit 1 to Exit 2 North bound and South bound lanes
- I-29 & I-229 Median Guardrail upgrades
- I-29 Concrete Repairs: 60th St, Benson Rd, Maple/Russel, Madison St, 12th St, 26th St
- Bridge Maintenance: 60th St, 26th St, and Russell St
- 26th Street and Southeastern Ave
- I-90 EB and WB Ramps Widening

## Electric and Lights

- Whittier Neighborhood Underground Conversion, Phase II
- LED Conversion (Various Locations)
- 8th St and 10th St Fiber Optic Project

## Projects subject to change due to available funding

- Asphalt or Slurry Seal
- Asphalt Mill and Overlay
- Concrete/Utility Repair in 2020, Overlay in 2021

## Storm Drainage Projects

- Drainage Improvements (various locations)
- Sump Pump Collection Systems (various locations)
- Cliff Avenue Levee Outfall
- BMP 51-1, BMP 25-1E, Basin 371/373, Basin 115
- Highland Addition
- Riverdale Road

## Water Projects

- Water Purification Plant: Chlorine Building Addition & Ammonia Storage Project
- Water Purification Plant, West Reservoir, South Reservoir, and 85th St Tower Valve, Meter, & Piping Improvements
- Well #72
- 26th Street: Marion Road to Sertoma Ave (Cathodic Protection)
- 66th Street: Sundowner to Jordan Drive
- Six Mile Road: Donnally Drive to 10th Street
- 41st Street: Holbrook/Valley View Ave to Marion Road (Trenchless Rehab)

## Water Reclamation Projects

- Water Reclamation Plant Expansion (Masterplan Improvements)
- Main Pump Station Replacement
- ESS Basin 18C Sanitary Sewer Extension
- Pump Station 215 Force Main Improvements
- PS 240 Equalization Improvements P1- Equalization & P2 Forcemain
- PS218 & PS 203 Improvements
- Pipe Lining Program (Annual Program)

## Parks and Recreation Projects

- Greenway/ Trail Improvements: Bike Trail Cherry Creek Corridor
- Greenway/Trail Improvements Reconstruct Falls Park Drive, Oxbow Spur, 1229 Underpass
- Cyclic Park Infrastructure Improvements: Falls park and Yankton Trail Park
- Bike Trail Reconstruction Misc.

## Other City Facilities

- Centralized Facilities Improvements for Various City Buildings
- Centralized Facilities: Law Enforcement center Chiller Replacement
- Landfill: Leachate Recirculation and Gas System Infrastructure – Cells 2, 3, & 4
- Landfill: Building & Site Improvements





## Key Indicators of Pedestrian Facility Accessibility

The City has chosen key indicators of pedestrian facility to track over time to demonstrate overall progress in accessibility: vertical curb barriers removed, detectable warning presence, curb ramp running slope, obstructions in sidewalk and curb ramps, and notices of sidewalk repair issued and repairs completed, and height, reach and clear ground space at pedestrian push buttons.

**Table: Key Indicators of Overall Pedestrian Facility Accessibility**

Indicator	2020		2021	
<b>Vertical Curb Barriers</b>	<b>Number of Curb Ramps</b>	<b>Percent of Barriers Remaining</b>	<b>Number of Curb Ramps</b>	<b>Percent of Barriers Remaining</b>
Vertical Curb Barriers Removed	50	55.32%	40	54.04%
Curb Ramps Installed/Upgraded (including barriers removed)	640	Not applicable	724	Not applicable
<b>Detectable Warning</b>	<b>Number of Curb Ramps</b>	<b>Percent of Curb Ramps</b>	<b>Number of Curb Ramps</b>	<b>Percent of Curb Ramps</b>
Yes	11,184	67.93%	12,289	74.64%
No	5,680	34.50%	5,302	32.20%
Not Required	0	0.00%	0	0.00%
<b>Curb Ramp Obstructions</b>	<b>Number of Obstructions</b>	<b>Percent of Curb Ramps with Obstruction</b>	<b>Number of Obstructions</b>	<b>Percent of Curb Ramps with Obstruction</b>
General Obstructions	65	0.39%	59	0.35%
Inlet Lid	39	0.23%	37	0.22%
<b>Sidewalk Obstructions</b>	<b>Number of Obstructions</b>	<b>Percent of Segments with Obstruction</b>	<b>Number of Obstructions</b>	<b>Percent of Segments with Obstruction</b>
General Obstructions	209	0.84%	209	0.84%
Inlet Lid	316	1.27%	311	1.25%
<b>Curb Ramp Running Slope</b>	<b>Number of Curb Ramps</b>	<b>Percent of Curb Ramps</b>	<b>Number of Curb Ramps</b>	<b>Percent of Curb Ramps</b>
8.3 % or less	13,702	81.38%	14,595	86.68%
8.4 %–10.3%	1,669	9.91%	1,593	9.46%
10.4 %–13.3%	986	5.86%	941	5.59%
13.4 % or more	446	2.65%	399	2.37%
Unknown/Null	34	0.20%	28	0.17%

New Sidewalk Inspections		Number of Segments	Miles	Number of Segments	Miles
Inspections of New Sidewalk Installation		1,078	17.49	1,677	22.92
Notices of Sidewalk Repair		Number of Segments	Percent	Number of Segments	Percent
Sidewalk Inspection/Repair Program and/or Complaint Segments Inspected		3,065	4.9%	4,641	7.26%
Notices Sent		765	Not applicable	2567	Not applicable
Repairs Completed		354	46.27%	393	15.31%
Push Button Reach		Number of Pushbuttons	Percent of Pushbuttons	Number of Pushbuttons	Percent of Pushbuttons
10" or less		855	70.08%	907	72.33%
10" to 25"		298	24.43%	285	22.73%
Over 25"		67	5.49%	62	4.94%
Push Button Height		Number of Pushbuttons	Percent of Pushbuttons	Number of Pushbuttons	Percent of Pushbuttons
42"		489	40.08%	542	43.22%
42" to 48"		450	36.89%	449	35.81%
15" to 42"		177	14.51%	172	13.72%
Over 48"		104	8.52%	91	7.26%
Under 15"		0	0.00%	0	0.00%
Clear Ground Space at Push Button		Number of Locations	Percent of Locations	Number of Locations	Percent of Locations
30" x 48" or more		1,144	94.39%	1,187	94.66%
Less than 30" or 48"		32	2.64%	31	2.47%
No Clear Ground Space		36	2.97%	36	2.87%