



# Americans with Disabilities Act Transition Plan

*Parks and Nature Department  
July 2019 public review draft*

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### **Available under separate cover:**

Appendix A: ADA transition plan workbook

Appendix B: Trails evaluation results (slopes)

Appendix C: May 2018 community engagement report (W-T Group)

Appendix D: Conclusions and recommendations report (W-T Group)

Also available upon request: 2017 site evaluation reports

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## PLAN INTRODUCTION

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Metro Parks and Nature is committed to creating safe, welcoming and inclusive places for everyone in greater Portland to enjoy. This Americans with Disabilities Act (ADA) transition plan outlines a strategy for removing physical barriers experienced by people with disabilities, people for whom facilities design, construction and management frequently result in exclusion from outdoor recreation and other government programs.

This plan focuses on specific sites that make up Metro's parks and natural areas destinations. The role of the Parks and Nature ADA Transition Plan is to transition Metro's Parks and Nature facilities into environments that, when viewed collectively as one system, provide practical and meaningful access for individuals with disabilities. In helping fulfill requirements of Title II of the ADA, this document and its active implementation play an important role in meeting the agency's civil rights obligations.

This plan aligns with the Parks and Nature System Plan and the department Action Plan to Advance Racial Equity, Diversity and Inclusion.

### Plan in context

The ADA defines a person with a disability as a person who has a physical or mental impairment that substantially limits one or more major life activity. This includes people who have a record of such an impairment, even if they do not currently have a disability. It also includes individuals who do not have a disability but are regarded as having a disability.

In the United States, over 61 million people experience a disability that impacts major life activities. That's roughly one of every four residents.<sup>1</sup> People with disabilities in Oregon are nearly 2.5 times as likely to experience barriers to recreating outdoors.<sup>2</sup>

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<sup>1</sup> Centers for Disease Control and Prevention. "CDC: 1 in 4 adults live with a disability." Press Release, August 16, 2018.

<sup>2</sup> Oregon Parks and Recreation Department (OPRD). "Outdoor Recreation in Oregon: Responding to Demographic and Societal Change." 2019-2023 Oregon Statewide Comprehensive Outdoor Recreation Plan.

With age, disability becomes more common, affecting about 2 in 5 adults age 65 and older. In Oregon, adults aged 60 and older are among the least likely to participate in outdoor recreation.<sup>3</sup> The Centers for Disease Control and Prevention suggests that disability is more common among women and Indigenous community members.<sup>4</sup>

People with disabilities wish to pursue outdoor recreation as much as the general population. Obstructions or physical barriers, as well as not knowing of these obstacles ahead of time, puts people with disabilities at a disadvantage in finding a recreational opportunity of choice.

## **ADA Title II overview**

The Americans with Disabilities Act (ADA) is fundamental civil rights law for the people of the United States. Passed in 1990, the ADA establishes enforceable standards for eliminating discrimination against people with disabilities. The ADA defines “disability” in broad terms.

Title II of the ADA requires that public entities with 50 or more employees develop a transition plan. The role of a transition plan is to bring facilities into compliance with standards to achieve program accessibility. In this context, a program is any activity made available to the public in Metro’s parks and natural areas system.

Ensuring program access at a systems level is an important principle of the ADA and of this transition plan. More specifically, the ADA states, “A public entity shall operate each service, program, or activity so that the service, program or activity, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities” (28 CFR 35.150).

This transition plan addresses physical barriers in the parks and natural areas system through solutions that are both structural and non-structural in nature. Per the ADA, “A public entity is not required to make structural changes in existing facilities where other methods are effective in achieving compliance with this section” (28 CFR 35.150).

Often, transition plans focus on facilities that exist today. Because Metro’s parks and natural areas system is growing, this document also highlights the importance of adopting practices to ensure that all new Metro parks meet federal and state

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<sup>3</sup> OPRD, *ibid*.

<sup>4</sup> Centers for Disease Control and Prevention. “Disability Impacts All of Us.” <https://www.cdc.gov/ncbddd/disabilityandhealth/infographic-disability-impacts-all.html>. Accessed March 2019.



accessibility standards as required by law and, as a best practice, they meet the federal Final Guidelines for Outdoor Developed Areas.<sup>5</sup>

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<sup>5</sup> U.S. Access Board. 2013. Final Guidelines for Outdoor Developed Areas. <https://www.access-board.gov/guidelines-and-standards/recreation-facilities/outdoor-developed-areas>

## BARRIER REMOVAL PRIORITIES AND SCHEDULE

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**Appendix A: ADA transition plan workbook** is the living transition plan document and the ongoing record of barrier removal for Metro’s parks and natural areas system. It details the physical barriers and removal actions identified for each park destination.

The workbook will be updated regularly as Metro either removes barriers or finds programmatic solutions to eliminate or mitigate barriers. The ADA transition plan will be maintained by the ADA Coordinator, who is responsible for ensuring barrier removal and transition plan implementation. Contact the ADA Coordinator for the most current status of barrier remediation.

Cliff Higgins, Civil Rights Program Manager  
Interim ADA Coordinator  
Metro, 600 NE Grand Avenue  
Portland, OR 97232

### **Prioritizing barrier removal across the system**

Physical barriers across Metro’s parks and natural areas system will be removed systematically, following a phased, systems-level approach that reflects the following prioritization criteria and considerations. Prioritization criteria were developed with the support of a team of community accessibility specialists hired to advise Metro through the plan development process (see “Plan Development Process” on page18).

#### **Frequency or level of public use**

Sites or specific facilities with the highest level of public use are assigned a high priority. This will help remove barriers experienced by the greatest number of residents. Metro uses car count and trail count data to estimate visitor use levels.

#### **Program uniqueness**

Some programs are unique to a location and cannot or do not occur elsewhere in the Metro system. These sites or programs will be prioritized over recreation opportunities more commonly available, particularly at locations with high visitation and where community has confirmed a clear need (see “community need” below).

## **Geographic distribution**

Metro seeks to thoughtfully distribute barrier removal across the plan timeline and the system to provide accessible recreation opportunities for communities throughout the region. Proximity to accessible outdoor facilities managed by other jurisdictions may be considered in ongoing prioritization.

## **Public transit connections**

Transit service connecting people to their desired destination is a critical need for many people with disabilities. Metro destinations with bus or train service will be given greater consideration when allocating limited resources for implementation.

## **Community need**

Sites and assets identified during plan development by members of the disability community should be assigned a higher priority, as should facilities that serve communities of color and historically underserved areas or neighborhoods. In addition, Metro will document all requests from people with disabilities and consider related adjustments to the plan schedule on a routine basis.

## **Value and relative cost**

Metro is committed to creating complete, integrated recreation experiences for people with disabilities. This means focusing funding and staff time at locations where limited resources can be used most effectively to that end. Here, the total relative cost of barrier removal activities at each park destination is a factor in how Metro will distribute the work over time. Prioritization of sites and facilities will also reflect the previous criteria.

## **Additional considerations**

Additional considerations for phasing or prioritizing removal of barriers include:

- alignment of barrier removal with master plan implementation and/or maintenance, repair or replacement schedules
- management agreements with site management partners
- degree of complexity or nature of the barrier
- the potential to leverage resource opportunities such as grants
- agency finances.

## Plan timeline and phases

This ADA transition plan is based on a 15-year implementation schedule, broken down into three general phases. Each phase identifies specific park sites with the goal of focusing investments to create a holistic accessible recreation opportunity within a reasonable period of time and with available agency resources.

Phase one: years 1-3 (FY 2020-2022)

Phase two: years 4-8 (FY 2023-2027)

Phase three: years 9-15 (FY 2028-2035)

### **Phase one focus sites (FY 2020-2022):**

- Broughton Beach
- Blue Lake Regional Park
- Graham Oaks Nature Park
- Oxbow Regional Park

### **Phase two focus sites (FY 2023-2027):**

- Borland Field Station
- Chinook Landing Marine Facility
- Glendoveer Golf and Tennis
- Howell Territorial Park
- Lone Fir Cemetery
- Smith and Bybee Wetlands Natural Area

### **Phase three focus sites (FY 2028-2035):**

- Canemah Bluff Natural Area
- Cooper Mountain Nature Park
- James Gleason Boat Ramp
- Mount Talbert Nature Park
- Multnomah Park Cemetery
- Sauvie Island Boat Ramp
- Scouters Mountain Nature Park.

Physical barrier removal at Farmington Paddle Launch, Glendoveer Nature Trail and Mason Hill Park is low priority. The plan technical consultants advised that Metro may more effectively make its programs of hiking, picnicking and paddling accessible in other locations. Provided that barriers at other locations are removed, doing so at these three sites is not essential to bringing the parks and natural areas system into legal compliance.

See Appendix A: ADA transition plan workbook for greater detail.

### **Barrier categories: site-level priorities**

All barriers in the transition plan workbook are assigned a category. Categories are intended to help identify which barriers to remove first, and are assigned based on the principle of ensuring basic access. This approach is consistent with community and consultant direction that Metro “start with the basics.” Table A: Site level priorities outlines facility and amenity types by category or priority.

Metro will consider the unique needs and conditions of each site when prioritizing barrier removal. Work planning will happen at the site level and will be closely coordinated across the system. Metro Parks and Nature reserves the right to adjust the timing of removing specific barriers in order to respond to community requests.

**Table A: Site-level priorities**

<b>Category A barriers</b>	<p>Elements that enable arrival to and general movement through a site:</p> <ul style="list-style-type: none"><li>• Parking</li><li>• Exterior accessible routes</li><li>• Public circulation routes</li><li>• Exterior signage and general wayfinding</li></ul> <p>Public buildings and doors/entryways</p> <p>Restrooms</p> <p>“Low hanging fruit”</p> <p>Preventative maintenance and inspection protocols</p>
<b>Category B barriers</b>	<p>Drinking fountains</p> <p>Facilities for which enforceable standards exist such as:</p> <ul style="list-style-type: none"><li>• Children’s play areas</li><li>• Boating facilities</li><li>• Sports facilities</li><li>• Fishing facilities</li><li>• Golf course</li></ul> <p>Accessible routes to Category B recreation facilities</p> <p>Camping (available at Oxbow only)</p>
<b>Category C barriers</b>	<p>Facilities for which enforceable standards do not exist such as:</p> <ul style="list-style-type: none"><li>• Trails and trail features</li><li>• Picnic areas and picnic shelters</li><li>• Viewing areas</li></ul> <p>Trailhead signage and trail wayfinding</p> <p>Employee-only areas</p> <p>Facilities slated for renovation or replacement</p>

## SUMMARY OF BARRIERS AND REMOVAL ACTIONS

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The ADA encourages agencies to remove barriers in the most effective ways possible. Parks and Nature’s implementation strategy will focus on structural and non-structural solutions including:

- Maintenance activities
- Medium and large capital projects
- Changes to policy and program administration.

This section summarizes common barriers found across Metro’s parks and natural areas system and, at the broadest level, the actions the agency will take to remove them. The appendices to this document provide greater detail.

### **The information landscape**

Community members living with disability have asked Metro to provide information about accessibility of its sites more consistently and effectively. This includes information the agency provides online to help visitors plan their experience, as well as information available on-site upon arrival.

In a 2017 region-wide study, “not know[ing] enough about what I can do at Metro parks” was the most frequently identified constraint to visiting Metro parks and natural areas.<sup>6</sup> Metro plans to provide information that empowers individuals and families to make their own determination of what is accessible for them. Effective communication with all visitors and program participants is a requirement of Section 35.106 of the Title II regulations.

### **The built environment**

#### **Accessible routes**

The paved paths and sidewalks that make up the Metro parks network of exterior accessible routes<sup>7</sup> are in fair condition. Wear and tear, settling, weather and other

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<sup>6</sup> Oregon State University, 2017. “Final Report. Resident Needs and Behaviors in Portland Parks and Natural Areas: Understanding Communities of Color.” Table 9: Constraints making it difficult to visit Metro parks and natural areas.

<sup>7</sup> An accessible route is a continuous, unobstructed path connecting all accessible elements and spaces in a building, facility, or site. An accessible route is free of stairs, steep inclines, sharp changes in surface level, and has a surface which is stable, smooth and slip-resistant. From

factors have led to gaps and changes in level, creating barriers to people with physical and sensory disabilities. Metro’s plan includes investment to improve and create accessible routes throughout the system.

Connecting accessible routes to public sidewalks or adjacent rights-of-way is important to safe pedestrian access and complete transit connections for everyone, and particularly for people with disabilities. This may require coordination with local jurisdictions.

### **Accessible parking**

Slopes are the most commonly identified barrier impacting the accessibility of Metro’s accessible parking stalls and access aisles. The 2010 ADA Standards for Accessible Design (2010 Standards)<sup>8</sup> established a slope requirement that can be challenging to meet. In addition, passenger loading zones and parking access aisles must connect to an accessible route. Community members identified the location of parking stalls in relation to key park features as an important accessibility consideration, direction reinforced by the 2010 Standards.

The technical consultant has recommended that Metro address all accessible parking across the portfolio, at one time and using a uniform design template, to come into compliance with ADA and eliminate inconsistencies. While consistency is important, it is more likely that Metro will upgrade accessible parking on a site-by-site basis, as encouraged by community members.

### **Benches and seating**

Benches and seating serve a vital role in offering a quality visitor experience and places for rest. Community and consultants alike recommend and advocate for more benches throughout Metro nature parks, especially along trails. In addition, companion seating and wheelchair seating should be made a part of Parks and Nature design standards. Community members have also requested seat types to accommodate a variety of body sizes, particularly for community venues, meetings and events.

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Northwest ADA Center, 2019. Accessibility Checklist for Oregon: 2010 ADA Standards for Accessible Design and Oregon State Building Code.

<sup>8</sup> ADA Standards for Accessible Design. 2010.  
[https://www.ada.gov/2010ADASTandards\\_index.htm](https://www.ada.gov/2010ADASTandards_index.htm)



## **Trails**

Trail walking and related activities define the primary experience at many Metro parks and natural areas destinations. The ADA requires that Metro evaluate all of its facilities, including all trails. These included: regional trails, trails intended as accessible for people with disabilities, and trails that staff initially identified to have greatest potential to become accessible (see Appendix B: Trails evaluation results). During phase one of implementation (FY 2020 – 2022), Metro will complete the trails evaluation and add a comprehensive accessible trails strategy to this transition plan.

W-T Group’s recreation accessibility specialists recommend that Metro make at least 30 percent of all Metro trails accessible across the parks and natural areas system. Looking ahead, Metro will apply the Final Guidelines for Outdoor Developed Areas in trail planning and design.

## **Playgrounds**

At the time of the 2017 facilities evaluation, the Metro system included five playgrounds. Of these, one was accessible. As a best practice, at least one of every three playgrounds should comply with the 2010 Standards. Through this transition plan, Metro will bring play areas at Cooper Mountain Nature Park and Blue Lake Regional Park up to standard. Any playgrounds to be replaced or created in the future must comply with the 2010 Standards, at a minimum. Metro aspires to go beyond the minimum and apply forward-thinking principles of universal design with every play area project; the recent Oxbow Regional Park addition of two nature play areas sets an example for future investments.

To comply with the ADA, Metro will discontinue its use of engineered wood fiber as a play surface in new and renovated children’s play areas. Engineered wood fiber requires considerable cost and effort to maintain as an accessible surface; as a result, it generally does not provide a positive user experience or meet accessibility standards. Community members have advocated that this material never be considered accessible.

## **Picnic areas**

As with all activities available to visitors, the ADA requires that Metro make picnicking accessible to people with disabilities. Ten of Metro’s 24 picnic shelters are accessible. Metro will remove barriers at seven of the eight sites where picnic shelters are located and provide new access for people with disabilities at a

minimum of four more.<sup>9</sup> This includes investment at Oxbow Regional Park and work that will be integrated into Blue Lake Regional Park's updated master plan.

The Metro system also includes over 40 picnic areas<sup>10</sup>, none of which are accessible. Many of these sites need accessible picnic tables, accessible routes to access them, and/or minor route corrections. Metro will invest in creating accessible picnic areas at Blue Lake Regional Park, Howell Territorial Park and Oxbow Regional Park; this work is to include non-reservable picnic areas at Blue Lake and Oxbow.<sup>11</sup>

### **Fishing, boating and beach access**

Title II of the ADA requires that Metro's programs of fishing, boating and beach access each be made accessible. To accomplish this, the technical consultant advises that Metro invest in at least one of every three fishing areas, beach access areas and boating access locations respectively.

Metro will make corrections so that the fishing pier at Blue Lake remains accessible and will provide beach access for people with disabilities at Broughton Beach. Community members have advocated for the swim beach at Blue Lake to be accessible; in the future the beach may be closed permanently for public and environmental health reasons so this is not currently planned.

To help make boating accessible, the transition plan identifies investments at Blue Lake Regional Park, Chinook Landing Marine Facility, Gleason Boat Ramp and Sauvie Island Boat Ramp. Investments at Farmington Paddle Launch were not recommended. Smith and Bybee's canoe and kayak launch will be evaluated during the next phase of work.

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<sup>9</sup> Mason Hill Nature Park is the exception, where investment in picnic shelter accessibility is not planned. Mason Hill lacks parking, which is a significant constraint to providing an accessible experience.

<sup>10</sup> These picnic areas, in comparison to what are referred to as picnic "shelters" are unsheltered or with canopies.

<sup>11</sup> The picnic area at Sauvie Island Boat Ramp will be discontinued in the near future due to bank erosion along the Multnomah Channel.

## IMPLEMENTATION OVERVIEW

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Making the parks and natural areas system accessible for people with disabilities requires the work of many people. This section identifies the activities, systems, processes and commitment required for successful transition plan implementation.

### **Assign staff and create a staffing plan**

Effective implementation will require the participation of many people. Additional staff and/or reprioritization of staff time is needed to advance the work identified in this plan and meet agency obligations under ADA.

A public entity that employs 50 or more people is required to designate at least one employee to oversee and coordinate ADA Title II compliance. Some agencies have more than one ADA coordinator, with specific responsibilities assigned to each.

Common responsibilities of an ADA coordinator are as follows:

- establishing and overseeing grievance procedures
- conducting self-evaluation plans
- implementing transition plans
- monitoring on-going progress
- communicating policy and ADA regulations and guidelines
- coordinating activities among a number of departments
- identifying and utilizing appropriate resources
- ensuring effective use of resources.

### **Develop a phase one barrier removal work plan**

Successful implementation requires a clear and coordinated work plan for removing barriers across the sites identified. The initial work plan will focus on phase one sites and will reflect the prioritization approach of this plan. Work identified for the first years of implementation will be right-sized to reflect the ADA program budget as a longer-term funding strategy is created. Program managers will be asked to prioritize staff time to help keep transition plan implementation on schedule.

## Complete the facilities evaluation

Metro's parks and natural areas system has grown since the 2017 facilities evaluation, and so has the agency's understanding of the extent of its obligations under ADA Title II. Completing the evaluation of Parks and Nature facilities will be a priority of implementation phase one (FY 2020 -2022), so that programs in their entirety may be made accessible.<sup>12</sup> This includes identifying barriers and adding barrier removal actions addressing the below into the transition plan:

- all Metro-owned trails
- newly developed Metro destinations, including Killin Wetlands and Orenco Woods nature parks
- any properties where Metro has an ownership interest and public access is provided<sup>13</sup>
- adjacent rights of way and pedestrian connections in partnership with agency partners.

## Strengthen systems and processes across the agency

Proactive inclusion is an ongoing responsibility that will require Metro to adapt and strengthen existing systems and processes. Table B below outlines a strategy for how Parks and Nature can become more affirmative in its steps to ensure inclusion and ADA compliance across a growing and changing facilities portfolio. Here, the focus is on new facilities and alterations alike.

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<sup>12</sup> Metro is required to make each of its programs accessible. Metro is not required to remove each and every facility barrier to achieve program accessibility, per Title II of the ADA.

<sup>13</sup> This may include properties managed by other jurisdictions, natural areas with gravel parking, and/or where special uses by the public are permitted by Metro.

**Table B: Integrating accessibility into Parks and Nature systems and processes**

<b>Process or program (<i>team/lead</i>)</b>	<b>Measure of alignment with ADA transition plan</b>
Parks and Nature land classification <i>Conservation Division</i>	Sites identified for public access have notable potential to connect to transit and provide accessible recreation.
Capital improvement planning <i>Special Projects/Capital Projects Planner</i>	Capital investments and improvements align with ADA transition plan priorities, phasing and work plan.
Site planning and design <i>Planning/Planning Manager</i>	Disability community is engaged and Guidelines for Outdoor Developed Areas are applied. Transportation planners and transit service providers are engaged.
Capital asset management <i>Park Operations/Asset Management Supervisor</i>	Asset management schedules include and document removal of transition plan barriers.
Site operations and maintenance <i>Park Operations/Lead rangers</i>	Routine site management includes ADA maintenance actions; all accessibility-related complaints and requests are documented.
Procurement and contracting <i>Planning and Construction Project Management Office (cPMO)</i>	Language creates accountability; requirements and execution include expert second review.
Construction and facilities standards <i>Planning and cPMO</i>	Tolerances exceed minimum requirement; all new or altered facilities meet guidance or standards.
Accountability reporting <i>Leadership and Communications</i>	ADA plan is integrated into performance reporting to Metro Council and community stakeholders.
Policy planning and development <i>Leadership and Special Projects</i>	Policy and operating procedures for other power-driven mobility devices and service animals are in place and effectively communicated.
Work with site management partners <i>Management and Planning</i>	Agreements clarify roles and timeline of implementation.

## **Invest significantly in implementation**

Parks and Nature has limited funding to implement the ADA transition plan. Currently, the department allocates \$100,000 per year. The total plan cost is estimated initially at \$10 million, and that amount is likely to grow as remaining facilities are evaluated and project estimates are approached with greater precision.

To ensure the effective use of limited dollars, the department will establish a process to approve projects that advance priorities of the transition plan. The department ADA coordinator is responsible for ensuring barrier removal and transition plan implementation overall and, for this reason, should participate in the capital planning oversight committee and/or capital review committee.

In June 2019, Metro Council referred a Parks and Nature bond measure of \$475 million to the November 2019 ballot. Should the bond be passed by voters, Metro should be able to invest significantly in transition plan implementation.

## **Establish a procedure for public requests and complaints**

The ADA coordinator is responsible for ensuring that complaints and requests for accessibility improvements are documented, responded to and managed effectively and in coordination with the respective Parks and Nature teams or divisions.

In addition, Metro's adopted and published grievance procedures must provide for prompt and equitable resolution of complaints alleging any action that would be prohibited by Title II. Metro's grievance procedure can be found online at [www.oregonmetro.gov/civilrights](http://www.oregonmetro.gov/civilrights).

## **Formalize ongoing community review and evaluation**

Metro needs a formalized mechanism for meaningfully engaging people with disabilities in policy, program and design review. One role for the agency ADA coordinator is to explore opportunities to create a Metro or region-wide advisory body, ideally in close coordination with jurisdictional partners.

## **Conduct a program self-evaluation**

Making Parks and Nature programs, services and facilities accessible for people with disabilities is a significant and critically important undertaking. While this plan focuses largely on the built environment, Title II of the ADA also requires the agency to evaluate and strengthen program areas including but not limited to grant-making, customer service, communications, events, nature education and community engagement in decision-making. As part of this process Metro should confirm its

strategy to address the ongoing community need for safe and reliable transit connections to its parks destinations. ADA coordinators are generally responsible for overseeing or conducting a program self-evaluation.

This plan recommends that Parks and Nature place an explicit racial equity lens on its program self-evaluation for people with disabilities. Doing so is consistent with the department's Action Plan to Advance Racial Equity, Diversity and Inclusion. By focusing on people and communities who experience the greatest barriers to participation Metro will remove barriers that impact all people. Approaches could include hiring a group or organization led by disabled people of color, and working with community to center the expertise and perspective of people with multiple oppressed identities in the self-evaluation process.

## PLAN DEVELOPMENT PROCESS

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This section provides a brief summary of the process for developing the Parks and Nature ADA transition plan. The contributions of consultants, community and staff helped to define each project phase.

### Facilities evaluations and recommendations

Metro hired recreation accessibility specialists, also referred to as technical consultants, at W-T Group to evaluate its parks and natural areas destinations and recommend a transition plan for the department.

Through site-by-site evaluation, W-T Group identified potential barriers to accessibility for people with disabilities. Facility evaluations were completed in fall 2017 using the 2010 Standards and the 2010 Oregon Structural Specialty Code (Chapter 11: Accessibility). Where final and enforceable standards do not exist, W-T Group applied the final Guidelines for Outdoor Developed Areas, which are required of federal agencies and considered best practice for local and regional governments.

Looking across the system, W-T Group then recommended specific actions to remove identified barriers. These actions are the foundation of this transition plan. Taken altogether, they focus on achieving program access through distinct phases of work completed over a 15-year period. W-T Group recommended changes to policy and operating practices in addition to over 600 capital and maintenance actions.

### Community engagement

Metro contracted with four accessibility specialists from the region's disability and advocacy communities to help shape and guide plan development:

- Patricia Kepler, Portland Community College
- Georgena Moran, Access Recreation
- Debra Timmins, Access Recreation
- Jennifer Wilde, Adventures Without Limits

During the first project phase, the community consultant team reviewed the work of the technical consultant. The team also helped design and facilitate two engagement events with the broader public. Events were held in May 2018 to inform community of the planning process, share high level results of the facilities evaluation, and build



agency understanding of community accessibility priorities (see Appendix C: May 2018 community engagement report).

With limited resources for implementation, the question of where to start and how to focus dollars and staff time became vitally important. Informed by the two engagement events, the community consultant team recommended the criteria to prioritize the work (see pages 4-5). In addition, the team advocated for an investment strategy focused on creating whole inclusive spaces, a strategy that requires removing the barriers at any given site within a much shorter period of time than originally suggested by the technical consultants.

Over 40 community members contributed to the development of this draft plan. Community members represented themselves as people who experience disability and, in some instances, disability advocates and family members of people with disabilities.

### **Public review of draft plan**

This draft Transition Plan will be available online for public review through September 10, 2019. Hard copies will be available to review at the following locations:

- Metro Regional Center, 600 NE Grand Avenue, Portland, OR 97212
- Blue Lake Regional Park, 21224 NE Blue Lake Road, Fairview, OR 97024
- Glendoveer Golf and Tennis, 14015 NE Glisan Road, Portland, OR 97230
- Oxbow Regional Park, 3010 SE Oxbow Parkway, Gresham, OR 97080
- Beaverton City Library, 12375 SW 5th Street, Beaverton, OR 97005
- Gresham Library, 385 NW Miller Avenue, Gresham, OR 97030
- Happy Valley Library, 13793 SE Sieben Park Way, Happy Valley, OR 97015
- Hillsboro Brookwood Library, 2850 NE Brookwood Parkway, Hillsboro, OR 97124
- Oregon City Public Library, 606 John Adams Street, Oregon City, OR 97045
- Wilsonville Public Library, 8200 SW Wilsonville Road, Wilsonville, OR 97070

Project staff are available upon request to meet with groups to review and discuss the draft plan. Please email [accessibility@oregonmetro.gov](mailto:accessibility@oregonmetro.gov) or call 503-813-7510.

## STAFF RESOURCES

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External link: Americans with Disabilities Act Title II Regulations:

[https://www.ada.gov/regs2010/titleII\\_2010/titleII\\_2010\\_regulations.htm](https://www.ada.gov/regs2010/titleII_2010/titleII_2010_regulations.htm)

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External link: Chapter 11 Oregon Structural Specialty Code:

<https://www.oregon.gov/bcd/codes-stand/Pages/commercial-structures.aspx>

External link: U.S. Access Board Final Guidelines for Outdoor Developed Areas:

<https://www.access-board.gov/guidelines-and-standards/recreation-facilities/outdoor-developed-areas>