

2021

CITY OF PORTLAND  
BUREAU OF TRANSPORTATION

# ADA Title II Public Right-of-Way Transition Plan Update



*Pedestrians entering a crosswalk.*



*Pedestrians using the sidewalk.*



*A person sits on a bench.*

JULY 21, 2021  
FINAL PLAN ADOPTED BY COUNCIL  
RESOLUTION 37544



**PBOT**  
PORTLAND BUREAU OF TRANSPORTATION

## PORTLAND CITY COUNCIL

**Ted Wheeler**, Mayor

**Jo Ann Hardesty**, Commissioner-in-Charge

**Mingus Mapps**

**Carmen Rubio**

**Dan Ryan**

### CONTRIBUTING TEAMS

Many people contributed to the creation of the ADA Transition Plan under the leadership of Director Chris Warner.

Key PBOT teams contributing this report include:

**Policy, Planning & Projects** Art Pearce

**Transportation Planning** Kristin Hull

**Complete Streets** Denver Igarta

**Equity & Inclusion Program** Tosin Abiodun and Irene Marion

**Communications & Public Involvement** John Brady

**Parking Operations** Chris Armes

**Business Services** Jeramy Patton

**City Attorney's Office** Linda Law

**Bureau of Technology Services** Rick Nixon

**Traffic Systems Engineering** Steve Townsen

**Utilities, Construction, Inspection** Alex Bejarano

### PROJECT TEAMS

**Lisa Strader**

ADA Coordinator

**April Bertelsen, Alexis Gabriel, Roger Geller, Raphael Haou, Steve Hoyt-McBeth, Eva Huntsinger, Peter Koonce, Roshin Kurian, Kathryn Levine, Michelle Marx, Janis McDonald, Ken McGair, Lee Munson, Heather Saby, Jonathan Simeone, Emily Tritsch, Chris Wier, Peter Wojcicki, Chon Wong**

Program Leads

**Maribeth Elmes, Gena Gastaldi, Shreya Jain, Francesca Jones, Gregory Mallon, Ian Ryan, Owen Slyman, Linh Vu**

Program Support

**Stacy Brewster, Ariane Kunze, Kailyn Lamb, Vanessa Micale, Sarah Petersen, Hannah Schafer**

Communications, Social Media Support

**Photos from the Portland Bureau of Transportation, unless noted otherwise.**

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To obtain a copy of this document or more information about this project, please visit:

<https://www.portland.gov/transportation/planning/adatransitionplan>

Portland Bureau of Transportation  
1120 SW Fifth Avenue, Suite 1331  
Portland, OR 97204  
Phone: 503-823-6152

The City of Portland complies with all non-discrimination, Civil Rights laws including Civil Rights Title VI and ADA Title II. To help ensure equal access to City programs, services and activities, the City of Portland will reasonably modify policies/procedures and provide auxiliary aids/services to persons with disabilities. Call 503.823.5282, TTY 503.823.6868 or Oregon Relay Service: 711 with such requests, or visit:

<http://bit.ly/13EWaCg>

# Contents

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<b>Introduction and Overview</b>	<b>6</b>
1.1 Goals and Objectives	
1.2 Commitment to Equity	
1.3 City of Portland’s Title II ADA History and Efforts	
1.4 Disability in Portland	

---

<b>Legal Requirements</b>	<b>16</b>
2.1 Federal	
2.2 State	
2.3 City	

---

<b>Identification of Barriers</b>	<b>22</b>
3.1 PBOT Self Evaluation	
3.2 Curb Ramps	
3.3 Pedestrian Signals	
3.4 Sidewalks	
3.5 Parking	

# Contents *(continued)*

---

## **Methods To Remove Barriers** **30**

- 4.1 Capital Improvements, Alterations, Maintenance, and Community Requests
- 4.3 Curb Ramps by Request
- 4.4 ADA Community Requests, Concerns, Complaints
- 4.5 ADA Exceptions
- 4.6 Website Accessibility
- 4.7 Design Standards and Specifications
- 4.8 Review of Policies, Practices, and Procedures
- 4.9 Training

---

## **Other Programs & Plans Enhancing Accessibility** **38**

- 5.1 City of Portland ADA Title II Transition Plan & Supplements
- 5.2 PedPDX Plan
- 5.3 Neighborhood Streets Program
- 5.4 Adaptive Cycling Program
- 5.5 Bike Lanes
- 5.6 Shared Streets
- 5.7 PDX WAV
- 5.8 Safe Routes to Schools
- 5.9 Transportation Wallet

---

## **Priorities and Funding** **46**

- 6.1 Prioritization Criteria
- 6.2 Funding

---

<b>Public Outreach and Engagement</b>	<b>52</b>
7.1 Public Events	
7.2 Public Comments	
7.3 Stakeholders	
7.4 Ongoing Engagement	

---

<b>Schedule For Barrier Removal</b>	<b>56</b>
8.1 Initial Schedule for Barrier Removal	
8.2 Transition Plan Updates	

---

<b>Person Responsible For Transition Plan</b>	<b>60</b>
---	-----------

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<b>Glossary of Terms &amp; Acronyms</b>	<b>62</b>
---	-----------

---

<b>Resources</b>	<b>66</b>
11.1 City of Portland (as an organization):	
11.2 Portland Area Resources:	
11.3 Oregon Resources	
11.4 Federal Resources	

---

<b>Appendices</b>	<b>70</b>
12.1 City Engineer Directive on Technical Infeasibility	
12.2 City of Portland Technical Infeasibility and Historical Significance Exceptions Policy	
12.3 ADA Transition Plan Public Involvement Stakeholder List	

01

# Introduction and Overview



*People riding bicycles along the Eastbank Esplanade in Portland.*

The City of Portland (the City) and the Portland Bureau of Transportation (PBOT) are committed to providing accessible services to the community. The needs of people with disabilities are a primary consideration for improvements to the right-of-way and to the delivery of PBOT services.

### PBOT'S MISSION STATEMENT

The Portland Bureau of Transportation (PBOT) is a community partner in shaping a livable city. We plan, build, manage, and maintain an effective and safe transportation system that provides people and businesses access and mobility. We keep Portland moving. PBOT's values are safety, innovation, equity, openness, respect, and inclusion.

PBOT's ADA Title II Public Right-of-Way Transition Plan Update (Transition Plan) is an update to the 1996 plan and fulfills the requirements set forth in Title II of the Americans with Disabilities Act (ADA).

The ADA states that a public entity must reasonably modify its programs, policies, practices, procedures, and infrastructure to avoid discrimination against people with disabilities.

Transition plans must include the following:

- Identification of obstructions in the public right-of-way that create barriers to people with disabilities.
- Identification of limits to full program access including review of policies, practices, and procedures that limit full access.
- Description of the methods to remove identified barriers and how to make them accessible, including priority setting and funding.
- A schedule to remove barriers within the public right-of-way and barriers to other programs.
- Provision for public review and comment on the transition plan.
- Identification of the individual responsible for transition plan implementation.
- Establish and maintain an effective public concern and/or grievance procedure.

The Transition Plan will provide a framework for the continuous improvement of the Public Right-of-Way (PROW) and related PBOT programs for people with disabilities. This is a living document, intended to be regularly updated as barriers are removed, and new plans and changes are undertaken by the City and PBOT.

## 1.1 Goals and Objectives

The three core goals of PBOT's 2019-2022 Strategic Plan are:

1. Safety
2. Moving People and Goods, and
3. Asset Management.

The primary goal of PBOT's updated Transition Plan is to provide full program access to people with disabilities. The Strategic Plan goals are encompassed in this Transition Plan goal. A fully accessible transportation system is one that is safe, allows all people to move through it, and is appropriately built and maintained. This Transition Plan provides PBOT with specific information on PROW and program barriers, identifying steps to eliminate them.

Through the self-evaluation, PBOT is reviewing its programs, services, and activities offered to the public, including a review of policies and procedures which influence and maintain them. The self-evaluation will assist PBOT in how to provide those services to people with disabilities and identify gaps.



*A person in the boxing ring.*

The Transition Plan is built on the self-evaluation work and identifies physical barriers in the PROW, provides the methods to remove those barriers, and develops a schedule for removal.

The Transition Plan also identifies the individual within PBOT who is responsible for the Transition Plan, which includes maintaining, implementing, and updating the plan, as well as acting as the point of contact to the public and a resource for internal bureau staff.

Finally, the Transition Plan provides information on PBOT's efforts to accept and address complaints from the community regarding ADA concerns or grievances.

## 1.2 Commitment to Equity

The City of Portland is committed to increasing diversity, advancing equity, and fostering inclusion in everything that we do. Equity, as defined by The Portland Plan in 2012, is when everyone has access to the opportunities necessary to satisfy their essential needs, advance their well-being, and achieve their full potential. We have a shared fate as individuals within a community and communities within society. All communities need the ability to shape their own present and future. Equity is both the means to healthy communities and an end that benefits us all. Simply put – equity is achieved when one’s identity cannot predict the outcome.

In 2015 the City of Portland adopted citywide racial equity goals and strategies. They are:

### **CITYWIDE RACIAL EQUITY GOALS:**

1. We will end racial disparities within City government, so there is fairness in hiring and promotions, greater opportunities in contracting, and equitable services to all residents.
2. We will strengthen outreach, public engagement, and access to City services for communities of color and immigrant and refugee communities, and support or change existing services using racial equity best practices.
3. We will collaborate with communities and institutions to eliminate racial inequity in all areas of government, including education, criminal justice, environmental justice, health, housing, transportation, and economic success.

## CITYWIDE EQUITY STRATEGIES:

1. Use a racial equity framework
2. Build organizational capacity
3. Implement a racial equity lens
4. Be data driven
5. Partner with other institutions and communities
6. Operate with urgency and accountability



*A child sitting on bench.*

Transportation planning decisions often have significant equity impacts and therefore equity concerns are front and center in PBOT's work. At PBOT, we have taken several actions to advance these equity goals and strategies, including:

- Established the Equity and Inclusion program in the Office of the Director and created several positions across the organization whose sole purpose is to lead the implementations of the equity goals and strategies, including an ADA Coordinator position
- Developed a five-year Racial Equity Plan and integrated a Transportation Justice focus within the organization's three-year Strategic Plan
- Incorporated equity-specific datapoints to assess deficiencies in the Portland's transportation system; prioritize capital and safety project investments; strengthen community partnerships; and assess program and service outcomes.

In November 2020, the City of Portland adopted citywide disability equity goals. They are:

## CITYWIDE DISABILITY EQUITY GOALS:

1. All activities, programs, facilities, and services offered by the City of Portland will provide for equitable outcomes and opportunities in accordance with the provisions of the Americans with Disabilities Act.
2. Hiring and promotions of people experiencing disabilities will be fair and in keeping with the Model Employer of people with disabilities Policy adopted by Resolution 36925 in 2012 and the Model Employer of people with disabilities Strategic Plan adopted by Resolution 37235 in 2016.
3. People experiencing disabilities will be provided equitable opportunities in contracting.

Implementation of these goals, including policies to provide effective communication as defined under Title II of the ADA, will be through Administrative Rules to be written in 2021.

Disability is a prominent focus within our equity and inclusion work, and this updated ADA Transition Plan will refresh our disability access workplan across the organization.



*Pedestrians using the sidewalk..*

## **1.3 City of Portland's Title II ADA History and Efforts**

Some key actions on behalf of the City related to accessibility include the following:

**February 5, 1992** - City Council unanimously adopted Resolution 34945, which affirmed that all programs, services, and activities provided by the City are accessible to people with disabilities. The resolution affirmed that people with disabilities should not be discriminated against when pursuing employment with the City.

**May 5, 1993** - City Council adopted Resolution 35135, which affirmed the policy to provide access to City's programs, activities, and services by approving a Transition Plan.

**October 4, 1996** - The City of Portland updated its ADA Transition Plan which included transportation elements.

**October 17, 2001** - City Council adopted resolution 36035, which established the City's Diversity Development/Affirmative Action Guiding Principles and Strategic Development Plan. The Strategic Development Plan called for an ADA Coordinating Committee to establish a Citywide committee to coordinate the ADA initiative and training. Presently, the ADA Title II Policy Coordinator manages a Citywide group of ADA Title II representatives.

**May 25, 2006** - Then Mayor Tom Potter drafted a letter to all Bureau Directors outlining a Program Accessibility Policy to ensure compliance with Title II of the ADA and provide a system to provide accommodations requested by persons with disabilities.

**December 2008** - The Portland Commission on Disability was created by City Council to further the work that the Portland Citizen's Disability Advisory Committee has been doing and to better engage the disability community in actively participating in city government. It is currently being replaced by a new group to connect the voices and concerns of the person with disability community in Portland to City Council and bureaus.

**June 19, 2013** - The City of Portland adopted the Civil Rights Title VI plan with the commitment to ensure that the City's programs, services, and activities are accessible to all persons.

**July 2014** - The Civil Rights Title VI and ADA Title II Program transferred to the Office of Equity and Human Rights.

**November 2014** - City Council accepted the City of Portland ADA Title II Transition Plan Update. This Transition Plan covered all facilities owned, managed, or operated by the City of Portland.

**August 2015** - Portland Parks and Recreation completed their Amendment to City of Portland ADA Transition Plan.

**February 2016** - PBOT completed an ADA Transition Plan Strategic Effort Report for PROW.

**November 2020** - City Council adopts Citywide Disability Equity Goals.



*2018 Walk and Roll to School Day at Whitman Elementary*

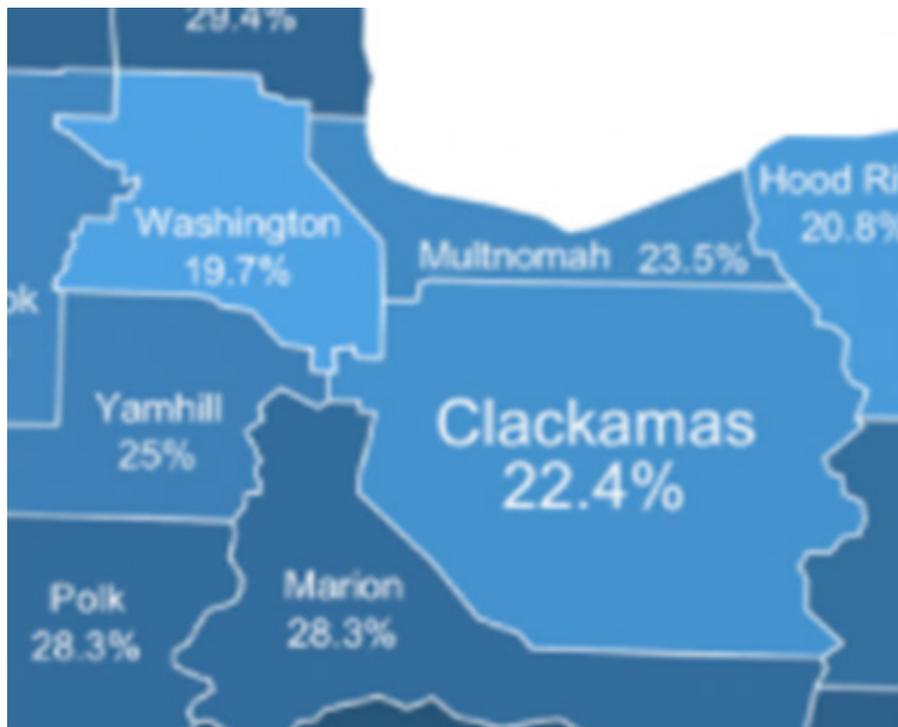
## 1.4 Disability in Portland

According to data from the Behavioral Risk Factor Surveillance System (BRFSS), 23.5% of people living in Multnomah County have a disability. In Clackamas County, 22.4% of people have a disability and in Washington County, 19.7% has a disability.

This map from data from the Behavioral Risk Factor Surveillance System (BRFSS) 2014-2017 compiled by Oregon Health and Sciences University (OHSU) shows statistics by county.

The percentages are as follows, moving from north to south and from west to east:

- Washington County: 19.7%
- Yamhill County: 25%
- Polk County: 28.3%
- Multnomah County: 23.5%
- Clackamas County: 22.4%
- Marion County: 28.3%
- Hood River County: 20.8%



*Figure 1.* A map of counties in Northwest Oregon showing the percentage of people with a disability in each county.

According to data from the 2013-2018 American Community Survey (ACS) 5-year estimate, the percentage of the population that reports having a disability increases with age. The types of disability include mobility, hearing, vision, cognitive,

self-care, and independent living. Of Portlanders between 5 and 17 years of age, 6.3% have a disability. Portlanders who are 75 years of age and older report a rate of disability at 53.5%.

**Table 1. Percentage of adults with select functional disability types:\*  
Types of Disabilities Comparing U.S. with Oregon**

[Note to NVDA and JAWS users: you can use Tab or Alt + Control + arrow keys to navigate the table]

<b>TYPE OF DISABILITY</b>	<b>U.S.</b>	<b>OREGON</b>
Mobility: Serious difficulty walking or climbing stairs.	12.9%	10.9%
Cognition: Serious difficulty concentrating, remembering, or making decisions.	11.4%	11.8%
Independent living: Difficulty doing errands alone, such as visiting a doctor’s office or shopping.	7.0%	7.8%
Hearing: Deafness or serious difficulty hearing.	5.6%	6.3%
Vision: Blind or serious difficulty seeing, even when wearing glasses.	4.7%	4.3%
Self-care: Difficulty dressing or bathing.	3.8%	4.0%

\*Data source: 2017 Behavioral Risk Factor Surveillance System (BRFSS).

\*\*Disability-associated healthcare expenditures are presented in 2006 dollars as reported in Anderson et al, 2010. This value represents approximately 25% of total healthcare expenditures for the state of Oregon.

02

# Legal Requirements



*Two people communicating.*

Legal requirements at the federal, state, and local levels identify that policies, practices, procedures, priorities, and funding strategies are in alignment with regulations. PBOT follows these legal requirements in its plans, programs, policies, practices, and activities.

## **2.1 Federal**

Section 504 of the Rehabilitation Act of 1973 [29 U.S.C. 794] prohibits discrimination against individuals with disabilities under any program or activity receiving federal financial assistance. The Americans with Disabilities Act (ADA) of 1990 prohibits discrimination and ensure equal opportunity for people with disabilities in employment, state, and local government services, commercial facilities, transportation, and both public and private spaces which are open to the public. Title II of the ADA applies specifically to all state and local government entities, ensuring that people with disabilities are not excluded from participation in or the benefits of the governmental entity's services, programs, or activities. Title II requires that state and local governments ensure that persons with disabilities have access to pedestrian routes in the public right-of-way.

The US Access Board developed the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in 1991 and updated them in 2004. In 2005, the US Access Board developed the Public Right-of-Way Accessibility Guidelines (PROWAG). The guidelines were subsequently updated in 2011 and 2013 but have not yet been officially adopted.

The United States Department of Justice is the federal agency with responsibility for issuing regulations implementing the requirements of title II of the ADA and for coordinating compliance activities with respect to those requirements. The Department of Justice and the Department of Transportation share responsibility for enforcing the requirements of title II of the ADA with respect to the public right-of-way, including streets, roads, and highways.

The Department of Justice published revised regulations for Titles II and III of the ADA in the Federal Register on September 15, 2010. These regulations adopted revised, enforceable accessibility standards called the 2010 ADA Standards for Accessible Design “2010 Standards” or “Standards”. 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 individuals with disabilities. PBOT applies the 2010 Standards for Accessible Design for new construction and alterations under Title II.

## **2.2 State**

Applicable Oregon law resides in Oregon Revised Statutes Chapter 267 – Transportation Districts, Chapter 447 – Standards and Specifications for Access by Persons with Disabilities (sections 447.210 to 447.310).

## **2.3 City**

In compliance with Title II of the ADA, it is the policy of the City of Portland that no person shall be excluded from participation in, denied the benefits of, or be subjected to discrimination in any City program, service, or activity on the grounds of disability. To help ensure access to City programs, services, and activities, the City of Portland reasonably provides accommodations to people with disabilities.

## **CITY AND PBOT POLICIES**

Audible Pedestrian Signal Policy identified in 3.2 below

**ADM-18.02** – Title VI Civil Rights Complaint Procedures

**ADM-18.20** – ADA Title II Complaint Procedures

**HRAR-2.01** Equal Employment Opportunity (EEO) Affirmative Action

**HRAR-2.02** Prohibition Against Workplace Harassment, Discrimination, and Retaliation

**HRAR-2.06** Title I Reasonable Accommodation for People with Disabilities

**HRAR-3.01** Recruitment Processes

**Policy 1.09** Title II and Title VI Information Policy

**Policy 1.10** Confidential and Sensitive Personnel Information

## **2035 Comprehensive Plan Policies:**

**9.9** Accessible and age-friendly transportation system

**9.19** Pedestrian safety and accessibility

**9.21** Accessible Bicycle system

**9.25** Transit Equity

## **CIVIL RIGHTS EDUCATION AND ENFORCEMENT CENTER (CREEC) CONSENT DECREE**

In the summer of 2016, the CREEC notified the City of its position that the City lacked adequate curb ramps in the pedestrian right-of-way that complied with applicable federal disability rights laws.

In the fall of 2016, the City entered into a Negotiated Agreement with claimants represented by CREEC for the Settlement Class to work cooperatively to resolve the allegations and to improve access to the City's pedestrian right-of-way.

The Consent Decree from this agreement can be accessed in the link below. The main elements are:

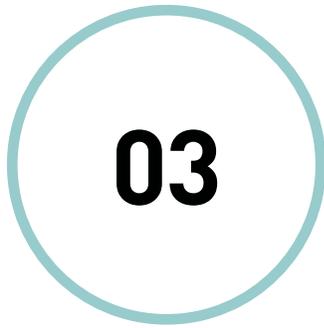
- The City will perform a survey of all City corners at street segments with sidewalks to identify and inventory all curb ramps throughout the City. The inventory results will be used to identify where curb ramps are needed and what curb ramps require fixes to be fully ADA compliant.

- The City will install or remediate (fix) 1,500 curb ramps for twelve years, commencing July 1, 2018.
- Curb ramps will be remediated through existing projects that trigger them and using the federally identified priorities.
- The City's Curb Ramp by Request program will also identify curb ramps to be remediated.
- An update to the PBOT PROW Transition Plan within three years of the effective date of the Consent Decree; by September 2021.
- Extensive outreach to the settlement class as well as to any other users of the transportation system who wanted to comment on the agreement.

The Consent Decree can be viewed at this link:

[\*\*Consent Decree\*\*](#)

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# Identification of Barriers



*Tilikum Crossing, Bridge of the People in Portland.*

### **3.1 PBOT Self Evaluation**

One of the obligations under Title II of the ADA is a self-evaluation survey, which was administered to PBOT managers and staff whose work regularly involves public communication, public engagement, or delivery of services to members of the public. PBOT will continue to evaluate its operations and make appropriate adjustments to provide full accessibility. Survey responses identified that PBOT programs and employees are generally aware of ADA requirements. The responses also indicated that there may be gaps in policies and practices of specific programs in terms of how employees communicate with and provide services to people with disabilities. Recommendations were made and are being implemented in several areas. As noted above, PBOT will continue to self-evaluate and adjust as appropriate.

### **3.2 Curb Ramps**

As part of the Consent Decree described in Section 2.3, the City will install or remediate (fix) 1,500 curb ramps for twelve years, commencing July 1, 2018.

The Consent Decree also required to the City to perform a survey of all City-owned street corners at street segments with pedestrian walkways to identify the number and types of curb ramps at each corner, as well as curb ramps and associated ramp landings that were missing or not compliant. Results of the survey and all collected data will be electronically recorded in the City's GIS database.

### 3.3 Pedestrian Signals

Traffic signals are an important part of PBOT's transportation system for people driving and walking, rolling, or biking. Pedestrian signals are required at all marked crossings of a signalized intersection. The pedestrian timing intervals can be automatic or triggered. Push buttons are used to provide a locator tone for people who are blind or low vision and will be used where necessary. In pedestrian priority areas, pedestrian signals are timed with the vehicular traffic signal automatically to encourage making walking easier. Actuated pedestrian signals are triggered by a pedestrian pushing a button to indicate they want to change the display to "walk" so they can cross. Many of the existing pedestrian push button locations are audible because that has been the City standard for more than 10 years. New audible pedestrian signals can be requested.

City staff and/or a mobility specialist from the Oregon Commission for the Blind will consult with the person making the request to understand the pedestrian's needs. The City's policy to evaluate these requests identifies that:

- The intersection must be signalized.
- The location be evaluated for safety, noise level, physical constraints, and neighborhood acceptance.

Full details of the policy and process can be viewed at this link or address:

[\*\*Audible Pedestrian Signals | Signals | The City of Portland, Oregon\*\*](#)

PBOT adds and improves pedestrian signals through most of its projects, including installation of audible signals in projects that are upgrading or adding signals. When signals are added or modified, data will be collected to identify whether signals are audible, accessible, and compliant.

*Person uses electric wheelchair on sidewalk*



### 3.4 Sidewalks

Pedestrian access via compliant, obstruction-free sidewalks is an important part of an accessible transportation system. Per City code, property owners, including homeowners, business owners, schools, other large institutions, and homeowner associations, are responsible for constructing, maintaining, and repairing sidewalks abutting their property. Traditionally the requirement to construct sidewalks where they are missing or deficient is triggered when development or redevelopment projects occur. However, City charter and City code also grants the City the authority to require the construction and maintenance of sidewalks outside the development process.

In response to complaints, PBOT inspectors assess sidewalks and notify the property owner of needed repairs. In the event timely repairs are not made by the property owner, PBOT hires a private contractor to make the repairs and bills the property owner for the costs. There is currently

an option for property owners to finance the cost of City completed repairs. The possibility of developing a proactive sidewalk inspection program is being evaluated. Details of the current sidewalk program can be found through this link:

[\*\*Sidewalk Maintenance Posting Program\*\*](#)

PedPDX is, PBOT's Pedestrian Master Plan. Strategy 8 of PedPDX (Construct and Maintain Obstruction-Free Sidewalks), identifies 14 actions to support a fully accessible sidewalk system. The Strategy 8 summary includes this language about a proactive sidewalk program. "An update to the City's sidewalk repair program could include proactive sidewalk inspection and could include strategies to identify financing options to help low-income households and other property owners address sidewalk repair. This strategy is particularly important for people with disabilities, as was heard in the Disability Focus Group." The specifics of the 14 action items are available through this link:

[\*\*PedPDX Plan The City of Portland\*\*](#)

PedPDX Action 8.7 identifies how PBOT will address utility poles that create sidewalk obstructions. Agreements with utility providers allow the City to require that utility poles be located in accordance with City right-of-way guidelines. Where applicable, PBOT will require utility providers to relocate utility poles currently within the pedestrian through zone. PBOT's Relocation Process for Public Utilities can be found at this link: [\*\*Relocation Process for Public Utilities\*\*](#)

Sidewalk obstructions can also include temporary or movable impediments. Outdoor furniture, sports equipment, debris, overgrown vegetation, abandoned scooters, and construction barricades that act as barriers to a clear pedestrian through zone are managed and/or addressed through various PBOT or other City programs. As part of the policies, practices, and procedures review, PBOT will ensure that appropriate language for clear and unobstructed paths of travel is included. The updated policies will also be clear on how to address and who will enforce violations of these policies.

While maintaining existing sidewalks remains a property owner obligation, PBOT does invest in sidewalk construction, particularly on busy streets that are deficient and could serve many pedestrians. Sidewalks are also constructed through PBOT's capital projects and private development projects.

An assessment of PBOT-maintained sidewalks was conducted in 2020. A request for funding to begin sidewalk repairs will be made for the 2021-2022 fiscal year.

## 3.5 Parking

### ACCESSIBLE PARKING IN THE PUBLIC RIGHT-OF-WAY

There are designated accessible parking spaces on city streets throughout Portland. PBOT is evaluating appropriate locations and adding accessible parking spaces in downtown Portland and business districts throughout the city. PBOT has a process that evaluates requests for an accessible parking space near residences or businesses of a person who requires one. This process is being updated as part of implementing the Transition Plan.

To increase the accessibility of short-term parking, the City adopted new policies for people using state-issued Disabled Person Parking Placards. The program extends parking meter times for people holding Disabled Parking Placards and adds reserved parking spaces for people holding these placards, including some specifically for wheelchair placard holders

A map of accessible parking on the public right-of-way and in city-owned parking garages is available at this link:

[Accessible Parking Map](#)

### PARKING STRUCTURES

PBOT owns and/or operates structured parking facilities in Portland, primarily downtown. These parking facilities are subject to ADA Title II and are required to be included in a transition plan, however, this Transition Plan is focused on the public right-of-way. PBOT completed a transition plan for its buildings, including parking structures, in October 2014. Barriers, inventories, and methods for removing them in PBOT parking structures are included in the City of Portland ADA Title II Transition Plan Update in sections 3.3 and 4.1.

The City transition plan that includes parking structures can be viewed at this link:

[City of Portland ADA Title II Transition Plan](#)

### 3.6 TRANSIT STOPS

The city is served by an array of transit modes, providers, and partnerships, including but not limited to:

- TriMet buses, MAX (Metropolitan Area Express) Light Rail and LIFT Paratransit
- C-TRAN buses
- Portland Streetcar
- Portland Aerial Tram
- Shuttles provided by various public and private operators

Transit stops and stations are primarily the responsibility of the transit provider, whether they are located in the PROW, on private property or in easements of some kind. Transit providers typically install, own, and maintain transit stop and station elements, such as stop poles, signage, benches, shelters, payment stations, kiosks, elevators, and other station infrastructure. Transit providers are responsible for removing barriers that obstruct access at the transit stops and stations they serve.

Many transit stops are located on city streets in PROW managed by PBOT. As the manager of the public right-of-way, PBOT has the primary responsibility to remove barriers that obstruct access at, to and through transit stops on city streets. There are a variety of methods that PBOT can employ to ensure accessibility of transit stops including parking removal to enable buses to pull to the curb and deliver passengers onto the sidewalk, curb extensions, curb ramps, and sidewalk improvements, among others.

Where accessibility needs to be improved at transit stops, PBOT will work with TriMet or other relevant transit provider, to identify any modifications required in the PROW. Accessibility modifications required to transit stops on city streets will be identified through the Transit Stop Inventory task in the Transition Plan's remediation schedule, in consultation with TriMet or other relevant transit providers.

As the owner of the Portland Streetcar, PBOT is responsible for removing barriers that obstruct access to and through Streetcar stops. Accessibility modifications required to the Portland Streetcar stations will be identified and included in the Transition Plan's remediation schedule in Section 8.1.



*People using wheelchairs wait to board the Portland Streetcar.*

# 04

## Methods To Remove Barriers



*People crossing the street during White Cane Safety Day.*

## 4.1 Capital Improvements, Alterations, Maintenance, and Community Requests

PBOT uses several different methods to install and repair curb ramps, pedestrian signals, sidewalks, and other accessible transportation elements. As the Transition Plan is implemented, these elements will be made compliant with a fully accessible transportation system as the goal.

- **Capital Improvement Projects** include new construction and planned improvement projects. These projects may require adding, replacing, or updating accessible elements in the PROW.
- **Alterations** in the PROW include repaving projects and all other work that may require installing and fixing accessible elements.
- **Maintenance** work in the PROW may also require work to repair or replace non-compliant or missing accessible elements.
- **Community requests** take many forms through opportunities specifically identified in Section 4.4 below and often result in work to bring accessible transportation elements into compliance with ADA.

## 4.2 Work by Others on City Right-of-Way

The City of Portland's Bureau of Development Services (BDS) provides permits for developments such as residential, office, industrial, and commercial buildings, and housing which may trigger public improvements. Public improvements may include accessibility elements such as sidewalks, ramps, and signals. These permittees are required to construct the improvements to the full accessibility standard to the maximum extent feasible.

### **4.3 Curb Ramps by Request**

In 1997, the ADA Curb Ramp Request Program was developed to respond to requests from community members to build curb ramps on local streets throughout the city. This program provides construction/remediation of up to 100 curb ramps per year submitted by or on behalf of a person with a disability. Rebuilding and installing new corners to provide curb ramps by request is one way the City provides access for people who have limited mobility or who use wheelchairs or other mobility devices. Requested sites are evaluated in the order received.

More information on this program can be viewed this link: [\*\*ADA Curb Ramp Request Program | The City of Portland, Oregon\*\*](#)

### **4.4 ADA Community Requests, Concerns, Complaints**

In addition to the Ramps by Request Program, the City has several ways for community members to make requests, submit concerns or file complaints regarding PROW accessibility and compliance with the ADA.

#### **REQUEST AN ACCOMMODATION OR CONTACT AND ADA COORDINATOR**

To request an accommodation, alternative format of communication, ASL interpreter or modification of policies and procedures in order to access City of Portland programs, services and activities, please contact the ADA Coordinator for the responsible bureau as soon as possible but no later than five business days before the program or event. The ADA Coordinators can be found at this link:

[\*\*ADA Coordinator List\*\*](#)

## **823-SAFE**

Community members can contact the City regarding maintenance or traffic safety issues including signage, signals, pavement, sidewalks, and potholes. Issues may include, but are not limited to, concerns about crosswalks, proper signage, visibility, and traffic speed and volume.

Contact can be made by telephone at 503-823-SAFE (7233).

Contact can be made through this link: [Transportation Safety and Neighborhood Livability Hotline](#)

or this link:

[Submit a request online.](#)

## **PDX REPORTER**

The PDX Reporter is a convenient way to interact with city bureaus and report problems and maintenance issues within Portland city limits. This app can be used on any web-enabled device.

To use the app, visit this link:

[PDX Reporter](#)

Once there, log in using your PortlandOregon.gov account, or the account you used with the previous version of the app. Login is required,

but registration is free and open to the public--just use the "sign up" link on the login page. If you save the app to your home screen, you can use it just like any other app on your wireless device. See the in-app help page for more information.

## **SUBMITTING AN ADA TITLE II COMPLAINT**

Any person who believes they have been the object of unequal treatment or discrimination on the grounds of disability may file a complaint with the City of Portland's Title II program manager. This process applies to all complaints filed under Title II of the ADA arising from any program, service of or activity of the City of Portland or its sub-recipients. This is an administrative process that does not provide for compensatory or punitive damages.

The City's process is not exclusive. A person filing a complaint with the City may also file a complaint with other state or federal agencies or the courts. Other agencies will have time limits for filing complaints. Generally, federal agencies require Title II complaints to be filed within 180 days of the date of the discrimination.

More information on how to file an ADA Title II complaint, including the form to use, can be found at this link:

[File a Complaint | The City of Portland, Oregon](#)

## **ACCESSIBLE PEDESTRIAN SIGNAL**

This program allows the Public to request accessible pedestrian signals. Please refer to section 3.3 for details. You may submit a request for an accessible pedestrian signal at this link:

[Accessible Pedestrian Signal Request Form](#)

## **4.5 ADA Exceptions**

ADA, Title 28 of the Code of Federal Regulations, Section 35.150(a) (also referred to as the ADA Rules), provides that public entities will operate their services, programs, and activities to be sure they are readily accessible and usable by people with disabilities. The ADA Rules also provide for some exceptions:

## **TECHNICALLY INFEASIBLE**

Under some conditions, the City may be limited in its ability, or completely unable, to provide fully compliant curb ramps, sidewalks, pedestrian signals, or other elements because of the existing physical or site restraints. For example, clear space at the top of the ramp is obstructed by a building, or the slope of a hill is so extreme as to prevent a reasonable slope for a curb ramp in both directions. Under these circumstances, the City may identify that a curb ramp is technically infeasible or structurally impractical. PBOT has adopted an administrative rule to govern its use of this evaluation. It is attached in Appendix 12.1.

## **UNDUE BURDEN**

The ADA Rules also state that the City may not be required to provide a modification if doing so would fundamentally alter the nature of a service, program, or activity or result in undue financial or administrative burdens.

Whether an alteration or accommodation is an undue burden requires evaluating all available resources and is a determination that must be made by the head of the agency.

The following factors are considered in determining whether a program modification would create an undue burden: the nature and cost of the modification, the financial resources of the city available to make the modification, the impact the expense of the accommodation will have on the affected city operation, and the permanence of the alterations affecting the site.

If a modification is determined to cause an undue burden, the City shall identify other options for providing access to facilities or services.

## **PROGRAM ACCESS**

The regulation also acknowledges that a public entity isn't required to make each of its existing facilities accessible to and usable by individuals with disabilities, if the program as a whole is accessible. For example, the City's decision not to install curb ramps at some locations (or to install them as a lower priority later), is acceptable if a reasonable path of travel is available even without those curb ramps.

## 4.6 Website Accessibility

In 2017, the City of Portland began planning the replacement of its then 15-year-old website. The Portland Oregon Website Replacement (POWR) team has since worked with PBOT and other bureau staff on rearchitecting the new site. The new website, launched June 2020, strives to make services and information that are easy to find, easy to access, and easy to understand for all community members. All content conforms with Web Content Accessibility Guidelines, WCAG 2.1 Level AA. The site is much improved with search and related information as well to help community members find what they are looking for efficiently.

Recent safeguards to ensure adherence include continuous detection and enforcement of WCAG standards surrounding accessibility of any new or changed content posted on the City website. This includes daily email notifications to POWR content specialists to ensure review and proper construction of tables, charts, maps, and other embedded graphics. These notifications also include posted videos, and audio files in

support of captioning or transcription within 5 business days of publishing, per the City Council resolution and related administrative rule.

Reach the City of Portland website at this link:

[City of Portland, Oregon | Portland.gov](https://www.portland.gov)

## 4.7 Design Standards and Specifications

PBOT has developed technical guidance in specifications and plans to ensure that when curb ramps, pedestrian signals, parking, sidewalks, and other accessible elements on or along PROW are constructed, they are designed and built compliant with ADA standards. These standards apply to work performed by PBOT, its contractors, utility companies, and other agencies or private companies when working in the right-of-way.

For instance, installing two curb ramps at corners is the City's standard design and is consistent with ADA standards. A single diagonal curb ramp is limitedly used when there are specific site constraints which make two curb ramps infeasible.

The primary design guidance used for designing curb ramps is from the Federal Highway Administration (FHWA), the 2010 ADA regulations and the Manual on Uniform Traffic Control Devices (MUTCD). For example, FHWA sets standards for curb ramps, including defining the Federal yellow color for new truncated domes. PBOT standard drawings include the details for truncated dome placement. PBOT standards meet the federal minimum ADA requirements. The standards and more information on accessible transportation system design can be found in PBOT's Standard Drawings & Details Webpage and on the ADA Page at these links: [Standard Drawings & Details | The City of Portland, Oregon](#) [ADA Page | For Engineers, Contractors & Consultants | The City of Portland, Oregon](#)



*Pedestrian crossing the street.*

## **4.8 Review of Policies, Practices, and Procedures**

PBOT operates using many written policies, procedures, ordinances, and codes. New or modified policies and procedures will be reviewed with the intention of ensuring that all PBOT programs support full accessibility. Existing policies and procedures will be reviewed to ensure that each supports full accessibility.

## **4.9 Training**

PBOT offers an ADA curb ramp workshop to staff and consultants, to educate and explain design and construction requirements. Staff has also attended Oregon Department of Transportation (ODOT) trains of best practices in curb ramp design and inspection. All Bureau employees attend mandatory equity training that provides some perspective on transportation justice and serving the needs of all transportation system users. PBOT and the City are developing accessibility education and awareness training. These trainings and others as appropriate, will evolve in the future to provide current, pertinent content to staff and consultants.

05

# Other Programs & Plans Enhancing Accessibility



*People using an off-street trail.*

PBOT is committed to full accessibility on the transportation system and in its programs. In addition to a barrier removal schedule within this Transition Plan, there are several other PBOT or City programs and plans that address elements of transportation system accessibility.

## **5.1 City of Portland ADA Title II Transition Plan & Supplements**

The City of Portland provides many different programs and services in multiple facilities to benefit its residents and visitors. Municipal facilities include City buildings, public parking lots, and City-owned and managed facilities operated by private or other public entities. Where the responsibility of one bureau ends and another begins is probably not apparent or important to residents and visitors but access to all City facilities, programs, and services is. Due to the unique business of various bureaus, several ADA Title II Transition Plans exist for the City.

In November 2014, the City Council approved a transition plan that addresses broader and more common elements of City facilities. The City of Portland's Transition Plan is the result of a detailed evaluation of all City of Portland municipal facilities where programs, activities, and services

are available to the public. This Transition Plan also includes parking structures, which directly relate to transportation access. This transition plan can be viewed at this link:

[\*\*City of Portland ADA Title II Transition Plan\*\*](#)

In August 2015, the City Council approved the Parks Facilities Update to the abovementioned Transition Plan. Portland Parks & Recreation (PP&R) facilities were evaluated as part of the Transition Plan, though due to the large number (260) of publicly accessible park facilities, the evaluations took longer to accomplish than those of other bureaus resulting in the parks-specific update. The Parks transition plan can be viewed at this link:

[\*\*City of Portland ADA Title II Transition Plan Parks Update\*\*](#)

In December 2016, the City Council approved the Performing Arts Venues update to the base Transition Plan. The City owns three performing arts facilities – the Portland’s Centers for the Arts – the Keller Auditorium, Arlene Schnitzer Concert Hall and Antoinette Hatfield Hall. To ensure consistency with the rest of the effort, the same consultant team and methodology were used to perform assessments at the Portland venues in early 2016. The Performing Arts Venues transition plan can be viewed at this link: [City of Portland ADA Title II Transition Plan Performing Arts Venue Update](#)

This transportation-focused Transition Plan update is intended to provide a framework for the continuous improvement of City facilities for people with disabilities. This is a living document, regularly updated as barriers are removed, and new facilities come under ownership or control of the City.

## **5.2 PedPDX Plan**

PedPDX is Portland’s Citywide Pedestrian Master Plan. Through PedPDX, the City of Portland affirms walking as a fundamental human right and the most fundamental means of transportation. It also identifies that there are multiple ways people can “walk.” Pedestrians can move using their own legs, a wheelchair, walker, scooter, cane or other mobility device. PedPDX ensures walking is a safe, accessible, and attractive experience for everyone in Portland by putting pedestrians at the forefront of City policy, investments, and design. It prioritizes sidewalk and crossing improvements, along with other investments to make walking safer and more comfortable across the city.

The plan identifies the key strategies and tools to make Portland a great walking city for everyone, including people with disabilities. The strategies that most directly support accessibility include addressing gaps in the pedestrian priority network, constructing, and maintaining obstruction-free sidewalks, and working with developers, residents, and property owners to provide pedestrian improvements.

The PedPDX plan can be viewed at this link:

[PedPDX Documents | The City of Portland, Oregon](#)

### **5.3 Neighborhood Streets Program**

In Portland, approximately 4% (50 miles of the 1,181 miles) of streets are unimproved – dirt and gravel. Another 17% (200 miles) of streets are under-improved – some pavement and/or sidewalks, but no street curb. These 250 miles of unimproved streets make it difficult for people to walk through their communities safely and easily. Based on community input, the Neighborhood Streets Program framework has been developed to include additional program elements to further address deficient neighborhood streets infrastructure. More information about the Neighborhood Street Program can be viewed at this link:

[Neighborhood Streets Framework | The City of Portland, Oregon](#)

### **5.4 Adaptive Cycling Program**

The Adaptive Cycling Program began as a pilot in spring of 2017 with a goal to increase biking access for people with disabilities. Now a standard PBOT program, Portland has coordinated this program to offer physical accommodation with its BIKETOWN bike share system. Designed in partnership with stakeholders from the people with disability community, Adaptive BIKETOWN is Portland’s adaptive bike rental program. PBOT partners with Kerr Bikes to provide a fleet of 15 bicycles, including handcycles, trikes, tandems, and electric adaptive bikes. The focus is on short to medium-length bicycle rentals, of one to three hours. Adaptive BIKETOWN ridership grew annually through 2019. Trips went down in 2020 during COVID however, the average length of rentals/trips increased with more people using the bikes for rides away from the Central City. More information about the Adaptive Cycling Program can be viewed at this link:

[Adaptive Cycling Program](#)

## 5.5 Bike Lanes

Bike lanes are an important element of the City's transportation system. One of PBOT's Strategic Plan commitments is to reduce carbon emissions. Bike lanes on the City's right-of-way provide an alternative to driving, which reduces carbon emissions. Bike lanes are used not only by the adaptive cyclists mentioned in the previous section and riders of typical bicycles, but also by users of many other micro-mobility devices such as scooters, electric skateboards, and Segway's. Wherever we can, PBOT provides separate facilities for cyclists and pedestrians and often, separation between those two uses. There are locations where pedestrian and cycling infrastructure intersect such as at crosswalks and even limited locations where they share the same infrastructure as on shared use paths and roadway shared shoulders. As we describe in Section 7.4 Ongoing Outreach, we recognize that we can provide more and better information to all transportation system users

about system elements, how they are intended to operate, upcoming projects, and changes to the system to improve the understanding and safety of all users. Oregon state law allows wheelchair users to use bike lanes when a sidewalk or shoulder is not present.



*A bike lane in downtown Portland.*

## 5.6 Shared Streets

Acquiring additional right-of-way for projects occurs occasionally but the PROW is a fixed commodity in most areas of Portland. As new modes of transportation are available to users and competition increases for use of the fixed PROW, PBOT is aware of the need to ensure safe and flexible use of it. Many City programs, plans, and projects are defining shared street strategies related to their specific efforts. For example, PedPDX, Strategy 5.2 includes a section on Pedestrian Shared Streets. A consultant will provide expertise to the Bureau in development of strategies to evaluate appropriate street designs. Through current efforts and over the life of this Transition Plan, PBOT will develop policies and procedures to apply to future projects.

## 5.7 PDX WAV

To improve on-demand service to people who use mobility devices, PBOT developed PDX WAV, a program which makes reliable, safe vehicle-for-hire services more easily accessible.

Unlike other transportation programs for people with disabilities, PDX WAV serves customers who need a ride now.

Customers requesting a wheelchair accessible vehicle (WAV) taxi will speak to a live dispatcher who will locate a WAV and send it to the customer's location. To order a WAV Transportation Network Company (TNC) such as Uber or Lyft, customers will use their wireless device and order the ride with an app. There is no need to be pre-registered with PDX WAV and you don't have to share a ride with somebody you don't know.

PDX WAV is improving service in Portland by encouraging companies to purchase and maintain more WAVs and encouraging drivers to operate WAVs through a subsidy program funded by the Accessible Services Fund.

City Code chapter 16.40 requires both taxis and TNCs to provide accessible on-demand service in Portland. More information about PDX WAV can be viewed at this link:

[PDX WAV](#)

## 5.8 Safe Routes to Schools

PBOT's Safe Routes to School (SRTS) program is a partnership between the City of Portland, schools, neighborhoods, community organizations, and other agencies to make walking and biking around neighborhoods and schools fun, easy, safe, and healthy. The SRTS traffic engineer works year-round on improvements to streets, signs, and signals around schools. These improvements benefit not just the students and their families, some of whom may be people with disabilities, but the communities and neighborhoods around the schools. More information about SRTS can be viewed at this link:

[Safe Routes to School | The City of Portland, Oregon](#)

## 5.9 Transportation Wallet

The Transportation Wallet is a collection of passes and credits for use on transit, the Portland Streetcar, bike share, and scooters. It is an effective, low-cost strategy to reduce parking demand and congestion by increasing trips taken on transit, and by biking, walking, and scooting. While not specifically designed for or targeted to people with disabilities, the program is available to all users and when used, makes getting around Portland more accessible.

[Transportation Wallet](#)

*Children Celebrating Safe Routes to School*



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# Priorities and Funding



*A roadside memorial for a pedestrian killed in roadway.*

## 6.1 Prioritization Criteria

### CURB RAMPS

As required by the ADA, the City provides new ramps and upgrades to ramps when that work is triggered by new construction and alterations (e.g. paving, new construction and development). In addition, the City provides up to 100 ramps per year requested through the City's Ramps by Request Program. The following prioritization methodology is used for curb ramps other than those installed or remediated in connection with new construction, and the Ramps by Request Program.

The CREEC consent decree specifies the order in which the City shall prioritize curb ramps at the locations that serve the areas, as follows:

1. Government offices, facilities, schools, and parks (including the pedestrian rights of way adjacent to facilities owned or operated by the City, and the paths of travel leading from such adjacent pedestrian rights of way to the primary entrances to such facilities);
2. Transportation corridors;
3. Hospitals, medical facilities, assisted living facilities, and other similar facilities;
4. Places of public accommodation, such as commercial and business zones;
5. Facilities containing employers; and
6. Residential neighborhoods.

Annually, the City will provide CREEC counsel a list of the locations at which the City plans to install accessible curb ramps or remediate existing curb ramps other than those installed or remediated in connection with new construction, alterations, and ramps by request. That list of curb ramps will be developed using the prioritization above.

PBOT will identify locations for installing accessible curb ramps on an annual basis following the proposed methodology.

### **1. Map government offices, facilities, schools, and parks.**

The City will start at locations ranked first in the CREEC consent decree priority, specifically government offices, facilities, schools, and parks (including the pedestrian rights of way adjacent to facilities owned or operated by the City, and the paths of travel leading from such adjacent pedestrian rights of way to the primary entrances to such facilities).

### **2. Use existing inventory to identify where curb ramps are lacking or require remediation.**

The City will compare the locations of facilities in 'step one' with the curb ramp inventory of locations lacking a ramp or where the existing ramp is technically non-compliant. Curb ramps installation will be prioritized for the paths of travel (within the PROW leading to the primary entrances to the facilities).



*Recently installed curb ramps in Portland.*

### 3. Use PBOT’s Pedestrian Priority Network to address the City’s pedestrian demand, safety and equity policies.

The Pedestrian Priority Network directly reflects pedestrian demand-based priorities. Public priorities relating to safety (“Streets where people walking have been killed or injured”) and equity needs (“Areas that serve people who need to rely on walking the most”) were overlaid on the Pedestrian Priority Network as part of the PedPDX prioritization framework. PBOT spent two years working with the community to develop PedPDX, to guide Portland’s policies and investments over the next 20 years. The Plan gives each of the streets within a pedestrian classification a score that reflects the level of demand for pedestrian movement on that street. This demand-based approach ensures that improvements are prioritized on streets that provide access to the walking destinations where demand is highest.



*A before and after photo of curb ramp in Portland.*

#### **4. Identify Overlap with Locations Ranked Lower in the CREEC Settlement Priority**

- Prioritize locations that provide access to other Areas identified lower in priority in the CREEC consent decree, specifically in the order below:
- Transportation corridors;
- Hospitals, medical facilities, assisted living facilities, and other similar facilities;
- Places of public accommodation, such as commercial and business zones;
- Facilities containing employers; and
- Residential neighborhoods.

To the extent possible, PBOT will apply this same prioritization strategy to pedestrian signals, sidewalks, transit stops, parking, and other transportation system elements when those are installed or remediated outside of capital projects and private developments.

## **6.2 Funding**

There are multiple ways funds are committed to address curb ramps, pedestrian signals, transit stops, accessible parking, sidewalks, and other accessible elements along or within the PROW and modifications of PBOT's policies, practices, and procedures to provide full program accessibility. Sections 4.0 and 5.0 identify projects and programs that remediate these elements as part of their efforts. Annual reporting and future updates of the Transition Plan may provide more information on funding related to specific accessibility updates in projects.

As a part of the CREEC consent decree, PBOT has committed to remediating 1,500 curb ramps per year for 12 years through 2030. This equates to approximately \$14 million per year of the agreement. The Ramps by Request Program is part of this funding commitment.

Projects to deliver modal plans will include funding for related and appropriate accessible elements within those project scopes.

All Capital Improvement Projects (CIP) and maintenance projects will fund accessible transportation elements that their projects trigger for remediation.

07

# Public Outreach and Engagement



*Pedestrians using crosswalk.*

The draft Transition Plan was released August 26, 2020. Hardcopies were mailed to over 130 individuals and organizations. It was posted on the website in English and the City's ten safe harbor languages which are Arabic, Chinese, Japanese, Lao, Romanian, Russian, Somali, Spanish, Ukrainian, and Vietnamese. A release email with links to the plan, the summary of the plan, and the related survey were sent to organizations and individuals identified in Appendix 12.3 and made available to anyone by request. Follow up emails were sent to the same list during the public comment period which ended on November 20, 2020. Hardcopies of the plan were available in English or the ten safe harbor languages, upon request.

## **7.1 Public Events**

Due to COVID-19, outreach was accomplished through a regularly updated website and 6 online open houses. These interactive sessions provided a presentation of the plan and time for participants to ask questions of PBOT staff. PBOT staff also presented to 13 organizations at their request, providing the same information as on the website and in the open houses while being able to engage on Transition Plan elements of specific interest to the organization.

## **7.2 Public Comments**

Public comments were captured at open houses, in meetings, from emails, and through a survey that was available online and offered as a hard copy. All comments were reviewed and considered in development of the final Transition Plan.

## 7.3 Stakeholders

PBOT communicated the availability of the draft Transition Plan and engagement opportunities to individuals and organizations identified in Appendix 12.3. The stakeholder list includes advocacy organizations, non-profits, and government agencies that support and serve people with disabilities. The list also includes advocacy organizations, non-profits, and government agencies that serve and support culturally specific populations where there are likely members or clients with disabilities who may not use disability-specific programs.

## 7.4 Ongoing Engagement

An important element of making the transportation system and PBOT's programs fully accessible, is continued engagement with users. PBOT is particularly interested to engage people with disabilities, their family members and caregivers. We want to develop a relationship and regular dialog. We realize that transportation system elements can be designed and installed fully compliant and still not work as well as they could have if we had engaged users during the planning phase. PBOT will continue to develop relationships, host roundtable conversations, attend organization meetings, host open houses, provide social media posts, and engage in other ways to provide the most complete and robust dialog we can about the work that we do and how to best service our users.

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08

## Schedule For Barrier Removal



*A person using a wheelchair and child communicating.*

## 8.1 Initial Schedule for Barrier Removal

Barriers to full PBOT program access can include buildings, curb ramps, pedestrian signals, on-system parking, sidewalks, policies, practices, and procedures. Building barriers are addressed in City of Portland ADA Title II Transition Plan Update, adopted by Portland City Council in October 2014.

The City has committed to installing or remediating 18,000 curb ramps over 12 years which started in 2018. The scheduled work to achieve this goal will be a combination of community member requests by people with disabilities, capital improvement projects, alterations in the right-of-way (which includes street repaving, maintenance, and private development).

There are multiple capital improvement projects in the planning, design, and construction phases each year. These neighborhood greenway, active transportation, corridor, and multimodal projects modify and improve the transportation system, including improvements to accessibility. View current projects with this link:

[Projects in the Pipeline](#)

The 20-year schedule below identifies PBOT's initial plan to make the transportation system and PBOT programs fully compliant. The early years are focused on identifying the work that needs to be done, identifying how existing projects and maintenance efforts already make elements compliant, and identifying how to capture those details to report on them and update the schedule as it is being implemented. Virtually every PBOT project or effort over the last several years has made improvements to accessibility, including bringing non-compliant elements into compliance. That will continue so that even as our transition plan focus in those the early years is on defining the scope of all the work, we will be making progress. After the first few years, the schedule will be adjusted to reflect what we have learned, actual progress made, and future plans.

**Table 2.** Transition Plan 20-Year Target for Barrier Removal

[Note to NVDA and JAWS users: you can use Tab or Alt + Control + arrow keys to navigate the table]

	2021 - 2022 FIRST FIVE YEARS	2022 - 2023 FIRST FIVE YEARS	2023 - 2024 FIRST FIVE YEARS	2024 - 2025 FIRST FIVE YEARS	2025 - 2026 FIRST FIVE YEARS	2026 - 2031 SECOND FIVE YEARS	2031 - 2036 THIRD FIVE YEARS	2036 - 2041 FOURTH FIVE YEARS
<b>CURB RAMP INVENTORY</b>	10%	20%	20%	20%	20%	10%		
<b>CURB RAMP REMEDIATION &amp; INSTALLATION</b>	1500	1500	1500	1500	1500	7500	750/*	*
<b>PEDESTRIAN SIGNAL CONDITION COLLECTION</b>		10%	10%	20%	20%	40%		
<b>PEDESTRIAN SIGNAL REMEDIATION</b>		5%	5%	10%	10%	20%	25%	25%
<b>ON-SYSTEM ACCESSIBLE PARKING INVENTORY</b>	25%	25%	25%	25%				
<b>ON-SYSTEM ACCESSIBLE PARKING REMEDIATION</b>					10%	30%	30%	30%
<b>IDENTIFY POLICIES NEEDING MODIFICATION</b>	100%							
<b>POLICY MODIFICATIONS</b>		25%	25%	25%	25%			
<b>TRANSIT STOP INVENTORY</b>		25%	25%	25%	25%			
<b>TRANSIT STOP REMEDIATION</b>					10%	30%	30%	30%
<b>INVENTORY SIDEWALKS ALONG CITY-OWNED FRONTAGE</b>	100%							
<b>CITY FRONTAGE SIDEWALK REMEDIATION</b>					25%	25%	25%	25%
<b>ENHANCE SIDEWALK ENFORCEMENT &amp; REMEDIATION</b>		10%	10%	10%	10%	20%	20%	20%

Where barriers cannot be removed and/or before barriers are removed under the proposed schedule, PBOT will provide interim programmatic accommodations when requested.

PBOT will review and evaluate the Transition Plan, the schedule, and the ADA programs for the PROW on an annual basis. The review and evaluation will include the following tasks:

- Update information on curb ramp status as curb ramps are installed and remediated.
- Provide information on transportation system elements that have been modified to be compliant.
- Provide information on policies, practices, and procedures that have been reviewed and modified to support full program access.
- Assess progress and make any updates to the schedule and other sections of the Transition Plan.
- Review requests for services and grievances received throughout the year and evaluate decision making and responsiveness.

- Provide these annual updates to the public via the transition plan website that can be viewed at this link:

[ADA Title II Public Right of Way Transition Plan | Portland.gov](#)

## **8.2 Transition Plan Updates**

As barriers are eliminated through projects, development, and changes to the transportation system, annual reports will be provided to the Portland City Council. The Transition Plan will be updated at least every five years.

09

## Person Responsible For Transition Plan



*In progress construction of a curb ramp.*

As required by the ADA when completing a Transition Plan, the City has made the following individual as responsible for the implementation of this Transition Plan.

PBOT ADA Coordinator

Lisa B. Strader

[\*\*Lisa.Strader@portlandoregon.org\*\*](mailto:Lisa.Strader@portlandoregon.org)

503-823-5703

[\*\*ADATransitionPlan@portlandoregon.gov\*\*](mailto:ADATransitionPlan@portlandoregon.gov)

# 10

## Glossary of Terms & Acronyms



*An accessible bicycle parking spot.*

**2010 ADA Standards:** Provide scoping and technical requirements for the accessibility to buildings and public facilities by individuals with disabilities under the ADA.

**Accessible:** compliant with the applicable provisions of Title II of the Americans with Disabilities Act (ADA) or any ADA standards adopted by the U.S. Department of Justice and U.S. Department of Transportation for application in the pedestrian right-of-way.

**Accessible Elements:** Public right-of-way curb ramps, sidewalks, transit stops, parking, and pedestrian signals that provides a transportation system accessible to all users.

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

**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.

**Alteration:** A change to a facility in the public right-of-way that effects or could affect pedestrian access, circulation, or use and may require related accessibility upgrades.

**Federal Highway Administration**

**(FHWA):** A branch of the United States 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.

**Manual on Uniform Traffic Control**

**Devices (MUTCD) :** National standard for traffic control devices for the United States. It was adopted by the State of Oregon. This manual provides guidance on signal button locations and heights.

**ODOT** – Oregon Department of Transportation

**PBOT** – Portland Bureau of Transportation

**“Pedestrian Facility” or “Pedestrian Facilities”:** Any portion of an intersection or street that is provided for pedestrian travel, and any Pedestrian Walkway, crosswalk, curb, curb ramp, walkway, pedestrian right-of-way, pedestrian undercrossing, pedestrian overcrossing, or other pedestrian pathway or walk of any kind, that is, in whole or in part, owned, controlled, or maintained by or otherwise within the responsibility of the City of Portland.

**Pedestrian Priority Network:** The network of Portland streets and paths that provide important pedestrian connections to transit and other key destinations.

**Pedestrian Signal:** Devices used at signalized intersections to notify pedestrians when it is safe to cross the street. Some, but not all, provide audible notifications.

**Pedestrian Walkway:** A sidewalk or other prepared exterior surface provided for pedestrian travel in the public right-of-way that is, in whole or in part, owned, controlled, or maintained by or otherwise within the responsibility of the City of Portland.

**PPP** – Policy, Planning, & Projects

**PROWAG:** An acronym for Public Right-of-Way Accessibility Guidelines; guidance 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. Although not yet adopted by US DOJ and US DOT, it is used as the standard by many jurisdictions.

**Public Right-of Way (PROW):** Public land or property, usually in interconnected corridors, that is acquired for or dedicated to transportation purposes.

**“Remediate” or “Remediation”:**

The correction of an existing non-compliant curb ramp, pedestrian signal, sidewalk, or other element to make it compliant with ADA standards.

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

**Transportation Corridors:** The backbone of transportation networks, they include multiple transportation modes and connect centers of economic activity with users in the area.

**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.

# 11

## Resources



*A person getting ready to ride in Adaptive BIKETOWN Kickoff.*

## 11.1 City of Portland (as an organization):

For employment related questions, concerns, complaints, accommodations (includes the application and hiring process):

- ◇ Human Resources  
503-823-3572
- ◇ This is the website link:  
[Portland Bureau of Human Resources](#)

For connections with City government:

- ◇ The Office of Community and Civic Life 503-823-4519
- ◇ This is the website link:  
[Community & Civic Life](#)

For issues of systemic barriers in government, Title VI, Title II, and language access:

- ◇ The Office of Equity and Human Rights 503-823-4433
- ◇ This is the website link:  
[Equity and Human Rights](#)
- ◇ Civil Rights Title VI  
503-823-2595
- ◇ This is the website link:  
[Title VI Program](#)
- ◇ ADA Title II 503-823-2709
- ◇ Language Access 503-823-4432

Request an accommodation or contact an ADA Coordinator:

- ◇ [ADA Coordinator List](#)

For Portland Police conduct concerns:

- ◇ Independent Police Review  
503-823-0146
- ◇ This is the website link:  
[Independent Police Review](#)

General Complaints about City Services & Practices:

- ◇ Ombudsman, 503-823-0144
- ◇ This is the website link:  
[Ombudsman](#)

For questions about building standards and codes (for non-city of Portland owned or occupied buildings):

- ◇ Resources at the Development Services Center: 503-823-7300
- ◇ This is the website link: [Development Services](#)

Code Enforcement/Code Violations:

- ◇ 503-823-CODE (2633)
- ◇ This is the website link: [Code Enforcement](#)

For other city services or if you are unsure of which bureau to contact:

- ◇ City Information 503-823-4000

## 11.2 Portland Area Resources:

Tri-Met

- ◇ Director of Diversity and Transit Equity: 503-962-2217
- ◇ These are website links: [Transit Equity](#)  
[Customer Support](#)  
[Para Transit Services](#)
- ◇ General: 503-238-RIDE (7433)
- ◇ This is the website link: [TriMet](#)

Multnomah County

- ◇ County Office of Diversity and Equity: 503-988-3399
- ◇ This is the website link: [Multnomah Diversity and Equity](#)
- ◇ Aging and Disability Resource Connection (ADRC): 503-988-3646
- ◇ This is the website link: [Multnomah Aging & Disability](#)

Clackamas County

- ◇ Aging and Disability Resource Connection (ADRC): 503-650-5622
- ◇ This is the website link: [Clackamas Aging & Disability](#)

Washington County

- ◇ Aging and Disability Resource Center: 503-673-2372
- ◇ This is the website link: [Washington Aging & Disability](#)

Independent Living Resources:

- ◇ 503-232-7411
- ◇ This is the website link:  
[Independent Living Resources](#)

## 11.3 Oregon Resources

NW ADA Center:

- ◇ 800-949-4232
- ◇ This is the website link:  
[NW ADA Center](#)

Bureau of Labor and Industry, Civil Rights Division:

- ◇ 971-673-0761
- ◇ This is the website link:  
[Civil Rights Division](#)

State of Oregon Building Codes Division:

- ◇ 503-378-4133
- ◇ This is the website link:  
[Oregon Building Codes Division](#)

Oregon Aging and Disability Resource Center:

- ◇ 855-673-2372
- ◇ This is the website link:  
[Oregon ADRC](#)

## 11.4 Federal Resources

US Department of Justice, Civil Rights Division:

- ◇ 202-514-3847
- ◇ This is the website link:  
[US DOJ Civil Rights Division](#)

Civil Rights Division, Complaint Line:

- ◇ 855-856-1247
- ◇ This is the website link:  
[US DOJ Civil Rights Complaints](#)

Civil Rights Title VI Information Line:

- ◇ 888-848-5306

ADA Information Line (national):

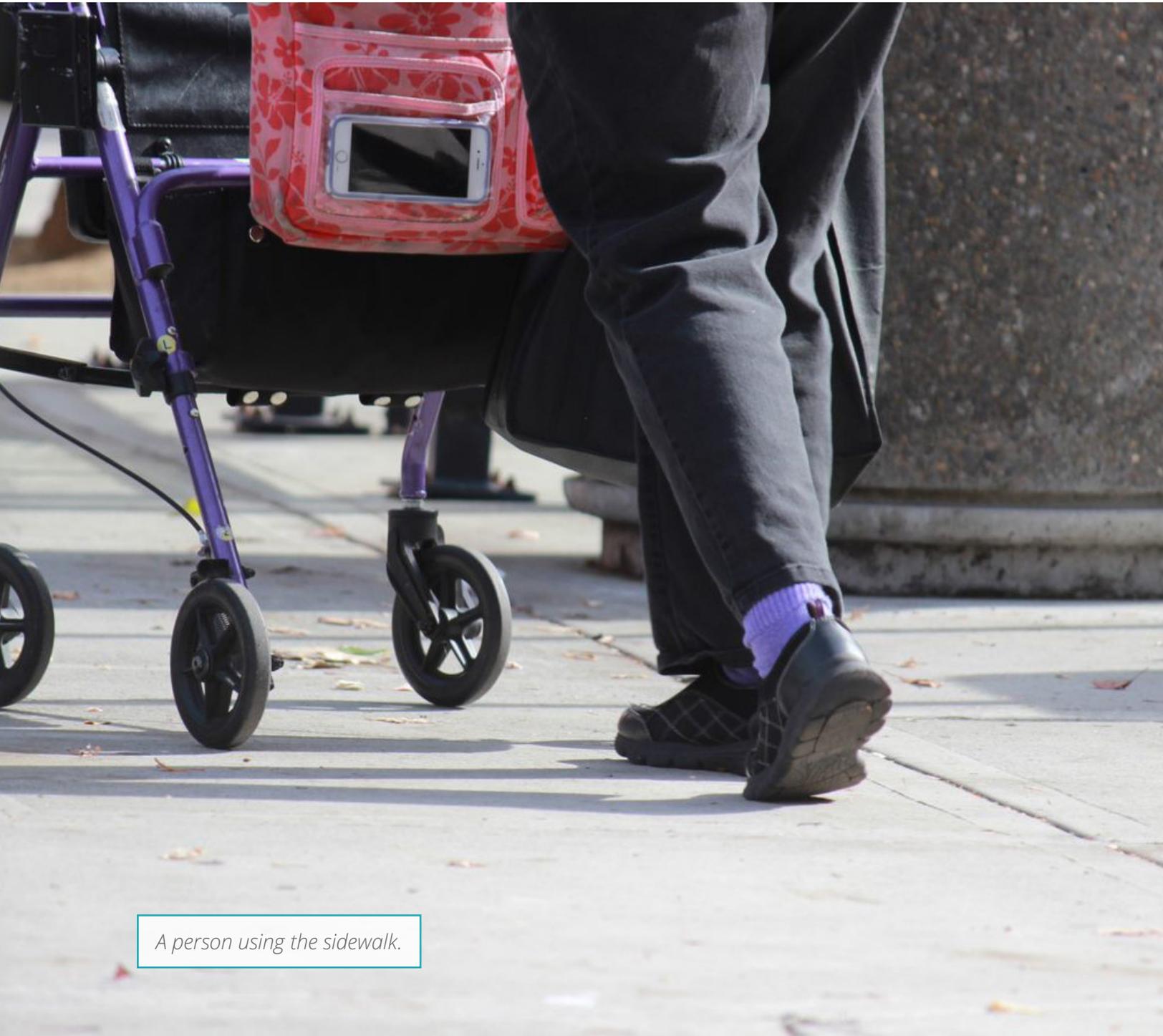
- ◇ 800-514-0301
- ◇ This is the website link:  
[US DOJ ADA](#)

United States Access Board:

- ◇ 800-872-2253
- ◇ This is the website link:  
[US Access Board](#)

# 12

## Appendices



*A person using the sidewalk.*

## 12.1 City Engineer Directive on Technical Infeasibility

# PBOT

PORTLAND BUREAU OF TRANSPORTATION

1120 SW Fifth Avenue, Suite 800 Portland, OR 97204 503.823.5185  
 Fax 503.823.7576 TTY 503.823.6868 www.portlandoregon.gov/transportation  
 Chloe Eudaly Commissioner Chris Warner Interim Director

### CITY ENGINEER DIRECTIVE

Number	Supersedes ST	Effective Date	Cancellation Date
ST 002-02	002-01	February 21, 2019	
Subject		Issuer	
City of Portland ADA Curb Ramp Design Criteria Curb Ramps <u>On</u> or Along ODOT Roadways Criteria for One Diagonal/Two Single Curb Ramps Technical Infeasibility Review and Approval		 Steve Townsen, P.E., City Engineer -----/	

### PURPOSE:

Provide clarification and guidance on (a) approvals of variances to the City of Portland ADA curb ramp criteria provided on the ADA Curb Ramp Design Form; (b) ODOT requirements for curb ramps built on or along ODOT roadways; (c) criteria for approval of one diagonal corner ramp in lieu of two single curb ramps at the corner; and (d) technical infeasibility review and approvals.

### DIRECTIVE:

#### The City of Portland ADA Curb Ramp Design Criteria

The design criteria for City of Portland curb ramps is provided on the PBOT ADA Curb Ramp Design Form.

Variance from these criteria requires a written justification and approval by the PBOT ADA Technical Advisor as shown on the ADA Curb Ramp Design Form.

#### Curb Ramps On or Along ODOT Roadways

ODOT requirements apply to curb ramp designs for ramps proposed on or along ODOT roadways. Specifically, obtain ODOT reviews and approvals and use ODOT forms and design exception procedures. Additionally, use ODOT Curb Ramp Inspection Forms for curb ramps constructed on or along ODOT roadways.

## One Diagonal Ramp in lieu of Two Single Ramps Is a Variance to City of Portland ADA Curb Ramp Criteria

The City's preference is to build two single curb ramps at a corner, rather than one diagonal ramp. However, FHWA provides for a variety of curb ramp types and configurations. See [https://www.fhwa.dot.gov/environment/bicycle\\_pedestrian/publications/sidewalk2/pdf/08chapter7.pdf](https://www.fhwa.dot.gov/environment/bicycle_pedestrian/publications/sidewalk2/pdf/08chapter7.pdf).



Constructing one diagonal curb ramp at a corner instead of two single ramps at a corner constitutes a variance from the City's criteria and requires approval of the PBOT ADA Technical Advisor. When one diagonal ramp is proposed, the Engineer of Record provides written justification on the ADA Curb Ramp Design Form in the area designated "Space for Additional Comments." Upon review and agreement, the ADA Technical Advisor approves by signing as provided on the ADA Curb Ramp Design Form.

In the case where additional right-of-way is necessary to construct two ramps at a corner, the City will first attempt to acquire said right-of-way, provided that the additional right-of-way does not contain a structure (such as a building). However, if acquiring additional right-of-way is not a viable option, another type of curb ramp configuration that fits within the existing right-of-way is allowable.

In the rare case where even one curb ramp cannot be constructed within the constrained right-of-way footprint, the crossing at this location may be closed, under the direction and authority of the City Traffic Engineer. City of Portland City Code 16.10.200 Duties of the City Traffic Engineer.

## Technical Infeasibility Review and Approval

For an alteration project, the public agency must incorporate the ADA accessibility standards to the maximum extent feasible. 28 CFR §35.151(b). The feasibility meant by this standard is physical possibility only. A public agency is exempt from meeting the ADA standards in the rare instance where physical terrain or site conditions restrict constructing or altering the facility to the standard. ADA Accessibility Guidelines 4.1.6(1)(j). Cost is not a factor in determining whether meeting standards has been completed to the maximum extent feasible. DOJ's ADA Title II Technical Assistance Manual, § II-6.3200(3)-(4), 1993.

The ADA Curb Ramp Design Form is used to document the decision to enable the City to explain the decision of technical infeasibility. The PBOT ADA Technical Advisor will work with you to determine if the particular situation meets the technical infeasibility standard and to assist you in providing the written justification necessary to support this determination. Exceptions due to technical infeasibility require a written justification and approval by an ADA Technical Advisor.

The City Engineer designates ADA Technical Advisors. PBOT has the following five ADA Technical Advisors:

Chon Wong, P.E., Jimi Joe, P.E., Raphael Haou, P.E., Chris Wier, P.E., and Eva Huntsinger, JD, P.E.

The ADA Curb Ramp Design Form is located on the PBOT website at:

<https://www.portlandoregon.gov/transportation/article/642921>

For additional information, please contact a PBOT ADA Technical Advisor.

## **12.2 City of Portland Technical Infeasibility and Historical Significance Exceptions Policy**

AMERICANS WITH DISABILITIES ACT TITLE II PROCESS FOR DOCUMENTING TECHNICAL INFEASIBILITY AND HISTORICAL SIGNIFICANCE EXCEPTIONS  
Administrative Rule Adopted by the Director of the Office of Equity and Human Rights pursuant to rule-making authority

The City of Portland must comply with Title II of the Americans with Disabilities Act (ADA). The ADA allows governmental entities to make exceptions to full and strict compliance with the requirements to alter existing buildings or facilities for accessibility. This administrative rule establishes the responsibilities and processes in the City of Portland for documenting and approving the exceptions to the ADA requirements in such alterations.

The exceptions described in this administrative rule include technical infeasibility and historical significance.

The City project bureau that identifies the need for an exception to full and strict compliance with ADA requirements to remove barriers shall provide documentation to the ADA Title II program manager in the Office of Equity and Human Rights (OEHR) that describes:

The rationale for requesting an exception for the identified element(s) or feature(s) in the alteration on the grounds of technical infeasibility or historical significance.

The efforts the bureau has made to achieve ADA compliance on the project to the maximum extent feasible. This could include steps the bureau has taken beyond the minimum legal requirements to offset potential accessibility limitations posed by the element or feature including accessible programmatic alternatives and/or equivalent facilitation.

The ADA Title II program manager may:

Request additional documentation or supporting information;

Recommend alternatives that could better meet ADA Title II requirements;

Request a meeting to discuss;

Determine the documentation is insufficient; or  
Concur with request for exception with or without comments.

Criteria and Documentation

### TECHNICAL INFEASIBILITY

An exception to design compliance may be approved for an identified element or feature in an existing building or facility on the basis that the alteration has little likelihood of being accomplished because of one or more of the following criteria.

The existing structural conditions would require removing or altering a load bearing member that is an essential part of the structural frame.

Other existing physical or site constraints prohibit modifications that are in full compliance with the minimum requirements.

Other existing physical or site constraints prohibit the addition of features, elements, or space that are in full compliance with the minimum requirements.

Supporting documentation should identify steps taken or proposed to be taken that would ensure that compliance with ADA was or can be accomplished to the maximum extent feasible.

### HISTORICAL SIGNIFICANCE

For a qualified historic site, building or facility, City bureaus may identify an exception for an identified element or feature if compliance with the ADA would threaten or destroy the historic significance of the building or facility.

For purposes of this administrative rule, a qualified historic building or facility is defined as a building or facility that meets one or more of the following criteria.  
Listed on the National Register of Historic Places or as a contributing structure in a National Register Historic District;  
Certified as historic property by the State Historic Preservation Officer pursuant to ORS Chapter 358;  
or, Designated as a local or Portland historic landmark under Portland City Code Title 33 or as a contributing structure in a locally designated Conservation District.

As part of its documentation requesting an exception under historical significance, the City bureau should include documentation of the building's or site's historic designation and historically significant features, and documentation regarding how the alteration would threaten, diminish or destroy the historically significant features and/or elements described in the historic listing, historic designation, or in a City, State, or Federal historic properties inventory.

Supporting documentation should identify steps taken or proposed to be taken that would ensure that compliance with ADA was or can be accomplished to the maximum extent feasible without threatening or destroying the historic significance of the building or facility. Final decision maker(s), ADA Title II program manager and project bureau must jointly ensure that an alteration provides the level of accessibility to the maximum extent feasible and the City's noncompliance with ADA design standards fully and strictly is a reasoned decision that is supported with adequate documentation. City project bureaus are responsible for providing timely, accurate and complete documentation for request for exceptions. The ADA Title II program manager is responsible for reviewing the requests and accompanying documentation and providing the City decision-maker with an assessment on the sufficiency of the exceptions request. Unless otherwise directed by the Commissioner-in-Charge, the Bureau Director is responsible for final review and approval of any requests for exceptions. Approval authority may be delegated to senior level supervisor in writing.

Consultation with the City Attorney's Office and/or technical experts in ADA accessibility design is encouraged during all steps of the request process. The final approval shall be maintained in the project file with copy provided to ADA Title II program manager.

## 12.3 ADA Transition Plan Public Involvement Stakeholder List

This is a list of the organizations PBOT made aware of the availability of the Draft ADA Title II Public Right-of-Way Transition Plan and its public comment period. PBOT did this by mailing a copy of the draft transition plan or emailing links to the plan, the summary, and the survey. We presented directly to some of these organizations. Some attend one of our open houses and/or provided comments.

AARP Oregon & chapters	Brain Injury Alliance of Oregon
Affiliated Tribes of Northwest Indians	Catholic Charities of Oregon
Africa House	Causa, Oregon Immigrant Rights Coalition
African Family Holistic Health Organization	Center for African Immigrants & Refugee Organization
African Youth & Community Organization	Central City Concern
Albina Ministerial Alliance	Central Northeast Neighborhood Coalition
American Council of the Blind, Metro PDX Chapter	Charles Jordan Community Center
AOCIL	Clackamas County Aging & Disability Resource Connection
APANO	Coalition of Communities of Color
Asian Family Center	Community Action
Asian Health & Services Center	Community Vision
Association of Oregon Counties	Congo Peace Project
Beyond Black	Connecting Communities Coalition (c/o Relay Resources)
Black Parent Initiative	

Council on American Islamic Relations	Hispanic Metropolitan Chamber of Commerce
CYMA space	Hollywood Senior Center
Czech School of Portland	Hygiene 4 All
Disability Arts and Culture Project	Immigrant and Refugee Community (IRCO)
Disability Awareness Resource Team	Impact NW
Disabled Refugee Alliance	Independent Living Resources
Disability Rights Oregon	Invisible Disabilities Association
Division Midway Alliance	Islamic Social Services of Oregon
Doulas Latinas	Latino Network
East County Rising	League of Oregon Cities
East Portland Community Office	Learning Disability Association of Oregon
Easter Seals Oregon	Lewis & Clark College - Student Services
El Programa Hispano	Lutheran Community Services
Epilepsy Foundation of Oregon	Meals on Wheels
Ethiopian and Eritrean Cultural and Resource Center	Metro
Family and Community Together (FACT)	Metropolitan Family Services
Forward Together	Micronesia Islander Community
Friends of Noise	Momentum Alliance
Hacienda CDC	Morrison Child & Family Services
HAKI Community Organization	Multnomah County Aging, Disability &
Hearing Loss Association of Oregon	

Veteran Services	NW Pilot Project
Multnomah County Communications	Northwest Portland Area Indian
Multnomah County Developmental Disabilities Services	Health Board
Multnomah County Disability Services Advisory Council	ODOT Region 1
Multnomah County Mental Health Services	OHSU Avel Gordly Center for Healing
Muslim Education Trust	On-the-Move Community Integration
NAACP, Portland Chapter	One Sky Center
National Alliance on Mental Illness (NAMI) Multnomah	OPAL Environmental Justice Oregon
National Federation of the Blind, Oregon Chapter	Open Signal
National Indian Child Welfare Association	Oral Hull Foundation for the Blind
Native American Youth and Family Center (NAYA)	Oregon Advocacy Commissions Office
Neighbors West/Northwest (NW/NW)	Oregon Association of the Deaf
North Portland Neighborhood Services	Oregon Bureau of Labor and Industries
Northeast Coalition of Neighborhoods	Oregon Commission for the Blind
Northwest ADA Center	Oregon Community Health Workers Association
Northwest Down Syndrome Association	Oregon Council on Developmental Disabilities
	Oregon Disabilities Commission
	Oregon Food Bank
	Oregon Health Authority
	Oregon Department of Justice Civil Rights Division

Oregon Department of Veterans' Affairs	Portland Meet Portland
Oregon Housing and Community Services	Portland Refugee Support Group
Oregon Mental Health Consumers Association	Portland State University-Disability Resource Center
Oregon Native American Chamber	Portland VA Medical Center
Oregon Parks and Recreation Department	Public Transportation Advisory Council Disability Workshop
Oregon Self Advocacy Coalition	Portland United Against Hate
Oregon Spinal Cord Injury Connection	Q Center
Oregon Vocational Rehabilitation	Rahab's Sisters
Oregon Walks	Reed College - Disability Support Services
Pamoja House	Real Choice Initiatives
Paralyzed Veterans of America, Oregon Chapter	Refugee Care Collective
PDX Friends of Refugees	Refugee & Immigration Services & Empowerment
PDX through a LatinX Lens	Ride Connection
Portland African American Leadership Forum (PAALF)	Right to Survive
Portland Community College - Disability Services	Rose Community Development
Portland Disability Justice Collective	Rosewood Initiative
Portland ESL Network	Russian Oregon Social Services
Portland Indian Elders Association	Self Enhancement Inc
	Slavic Community Center
	Spinal Coordinated

Somali American Council of Oregon  
(SACOO)

Southeast Uplift Neighborhood  
Coalition

Southwest Neighborhoods, Inc.

State Independent Living Council

Street Roots

Street Trust

SW Somali Community in Oregon

Symbiosis PDX

The Arc Multnomah-Clackamas

TriMet

Unite Oregon

United Cerebral Palsy of Oregon &  
South Washington

United Congolese Community Group

United Spinal Association

Urban League of Portland

USA Hello

Verde

Veterans Administration, Portland  
Regional Office

Vision Action Network

VOZ Workers Rights

Washington County Disability, Aging,  
and Veteran Services

Western Conexiones

