



Americans with Disabilities Act (ADA) Self-Evaluation and Transition Plan

Public Review Draft Plan June 2022



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Acknowledgments

Many individuals were involved with the development of the City of Lake Oswego ADA Self-Evaluation and Transition Plan. Implementation of this Plan will include efforts of City Leadership and across City Departments.

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1 Introduction

This ADA Self-Evaluation and Transition Plan (Plan) will support the City of Lake Oswego to fulfill 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 policies, practices, or procedures to avoid discrimination against people with disabilities. This Plan will assist the City in identifying policy, program, and physical barriers to accessibility, and will guide the City in developing barrier removal solutions.

The evaluation of policies, programs, and services is described in *Section 2 – Self-Evaluation* of this document. Section 2 details the review of City policies, services, programs, and activities and is based on responses to a program accessibility questionnaire, which was completed by City staff, conversations with city personnel, and a review of City documents and policies.

A description of the evaluation of physical barriers in the built environment at City facilities where programs, activities, and services are available to the public and the strategy for the removal of barriers is included in *Section 3 – Transition Plan*.

An overview of the topics the City should consider and address when implementing barrier removal efforts is provided in *Section 4 – Barrier Removal Considerations for Plan Implementation*.

Section 5 – ADA Coordinator, Notice Policy, and Grievance Procedure includes identification of the City's ADA Coordinator, the City's notice under the ADA, and the City's ADA Grievance Procedure.

Commonly used terms within this document and in the ADA are included in *Section 6 – Definitions*, and *Section 7 – Resources* contains a directory of disability organizations, guidelines, and resources for addressing the recommendations included in this Plan.

The City of Lake Oswego has established a designated ADA Title II Coordinator. The ADA Coordinator is responsible for tracking the efforts of the City to comply with title II and for the coordination and investigation of accessibility-related complaints. The ADA Coordinator is also considered a resource for City Departments to achieve ADA compliance and assist with policy and program development to ensure program accessibility (28 CFR 35.130, 28 CFR 35.149).

1.1 Legislative Mandate

The ADA is a comprehensive civil rights law for persons with disabilities in both employment and the provision of goods and services. The ADA states that its purpose is to provide a “clear and comprehensive national mandate for the elimination of discrimination against individuals with disabilities.” Congress emphasized that the ADA seeks to dispel stereotypes and assumptions about disabilities and to assure equality of opportunity, full participation, independent living, and economic self-sufficiency for people with disabilities. Congress passed the ADA on July 26, 1990. Title II of the ADA covers programs, activities, and services of public entities. Under the requirements of the ADA:

No qualified individual with a disability shall, on the basis of disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any public entity (28 CFR 35.130).

Further, title II of the ADA provides that public entities must identify and evaluate all programs, activities, and services and review all policies, practices, and procedures that govern administration of the entity's programs, activities, and services (28 CFR 35.105). This Plan and certain documents incorporated by reference establish the City of Lake Oswego's ADA Self-Evaluation and Transition Plan.

Application of Regulations

As a public entity, the City of Lake Oswego is subject to the ADA's title II Requirements for State and Local Government Programs and Services and is responsible for the provision of accessible programs and facilities that are available without discrimination toward people with disabilities. A fundamental tenet of title II of the ADA is “*the principle that individuals with disabilities must be provided an equally effective opportunity to participate in or benefit from a public entity's aids, benefits, and services.*” This principle is referred to as program accessibility.

A public entity may not deny the benefits of its programs, activities, and services to individuals with disabilities because its facilities are inaccessible. A public entity's services, programs, or activities, when viewed in their entirety, must be readily accessible to and usable by individuals with disabilities. This standard, known as “program accessibility,” applies to all existing facilities of a public entity. Public entities, however, are not necessarily required to make each of their existing facilities accessible (www.ada.gov/taman2.html).

As a public entity, the City is required to ensure program accessibility for the programs it provides to the public.

Maintaining Accessible Facilities

In addition to providing programmatic access, the City is obligated to maintain all accessible facilities in working order. Exceptions are provided for temporary disruptions. The ADA contains the following language regarding the maintenance of accessible features:

Maintenance of Accessible Features. Public entities must maintain in working order equipment and features of facilities that are required to provide ready access to individuals with disabilities. Isolated or temporary interruptions in access due to maintenance and repair of accessible features are not prohibited.

Where a public entity must provide an accessible route, the route must remain accessible and not blocked by obstacles such as furniture, filing cabinets, or potted plants. An isolated instance of placement of an object on an accessible route, however, would not be a violation, if the object is promptly removed. Similarly, accessible doors must be unlocked when the public entity is open for business.

Mechanical failures in equipment such as elevators or automatic doors will occur from time to time. The obligation to ensure that facilities are readily accessible to and usable by individuals with disabilities would be violated, if repairs are not made promptly or if improper or inadequate maintenance causes repeated and persistent failures (www.ada.gov/taman2.html).

1.2 Discrimination and Accessibility

This section provides an overview of physical and programmatic accessibility and the basic methods of providing access. Absence of discrimination requires that both types of accessibility be provided.

- *Physical accessibility* requires that a facility be barrier-free. Barriers include any obstacles that prevent or restrict the entrance to or use of a facility.
- *Program accessibility* requires that individuals with disabilities are provided an equally effective opportunity to participate in or benefit from a public entity's programs and services. Accessibility includes advertisement, orientation, eligibility, participation, testing or evaluation, physical access, provision of auxiliary aids and services, transportation, policies, and communication.

The City may achieve program accessibility by several methods:

- Structural methods such as altering an existing facility;
- Acquisition or redesign of equipment;
- Assignment of aids; and/or
- Providing services at alternate accessible sites.

When choosing a method of providing program access, the City is required to prioritize the method that results in the most integrated setting appropriate to encourage interaction among all users, including individuals with disabilities. In compliance with the requirements of the ADA, the City must provide equality of opportunity.

1.3 ADA Self-Evaluation and Transition Plan Requirements and Process

The ADA Self-Evaluation and Transition Plan is intended to provide a framework for the continuous improvement of City programs and facilities for people with disabilities. The Plan is intended to be a living document that is regularly updated as programs and services change, as barriers are removed, and new facilities come under ownership or control of the City.

The ADA Self-Evaluation identifies and makes recommendations to correct policies and practices in the City's programs and services that are inconsistent with title II regulations and result in limited access for people with disabilities. As part of the Self-Evaluation, the City:

- Evaluates services, policies, and practices;
- Identifies modifications needed to services, policies, and practices; and
- Involves people with disabilities in the self-evaluation process (28 CFR 35.105).

Programs, activities, and services offered by the City to the public must be accessible for people with and without disabilities. Accessibility applies to all aspects of programs or services provided by the City, including:

- Notice, Responsible Employee, and Grievance Procedure;
- Customer Service;
- Staff Training;
- Contracting, Licensing, or Other Arrangements;
- Public Meetings;
- Program Participation;
- Transportation Services;
- Tours and Trips;
- Accessible and Adaptive Equipment;
- Printed and Online Materials;
- Website;
- Televised and Audiovisual Information;
- Telecommunications;
- Emergency Planning;
- Facilities.

The Transition Plan is a document that outlines a strategy for the City to progress toward compliance with the ADA. The Transition Plan identifies physical barriers for persons with disabilities and a schedule to remove those barriers over time and must:

- List barriers;
- Identify feasible solutions to each barrier;
- Establish a timeline for removing barriers;
- Identify the person responsible for title II compliance; and
- Involve people with disabilities in the preparation of the Plan (28 CFR 35.150 (d)).

Self-Evaluation

The City of Lake Oswego evaluated its policies, programs, and procedures to determine current levels of service and the extent to which its policies and programs created barriers to accessibility for persons with disabilities. Recommended actions for City programs, activities, and services are incorporated as part of this Plan.

Transition Plan

The City completed a physical audit of facilities to identify potential facility barriers and identify recommendations and alterations to meet state and federal accessibility standards. The type of facilities evaluated include:

- City-owned and maintained parks;
- City-owned and maintained buildings;
- City owned parking facilities; and
- City-owned and maintained facilities in the public right-of-way.

At the time of the facility evaluations, the following resources were used to identify barriers at City facilities: the 2010 ADA Standards for Accessible Design, 2015 Architectural Barriers Act (ABA) Standards for Outdoor Developed Areas, 2019 Oregon Structural Specialty Code (OSSC), Chapter 11 Accessibility which incorporates by reference ICC A117.1-2009 Accessible and Usable Buildings and Facilities and the Oregon Transportation Commission Standards for Accessible Parking Places August 2018, 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG), and the 2009 r1 and r2 Manual on Uniform Traffic Control Devices (MUTCD). Building codes and standards are revised every few years. The barrier evaluations conducted provide an assessment of current conditions as viewed by current code and provide a baseline for future barrier removal.

1.4 Public Outreach

Public entities are required to accept comments from interested persons on their ADA Self-Evaluation and Transition Plan, including individuals with disabilities and organizations that represent them to assist in the self-evaluation process. A page is designated on the City's website to serve as an information portal for the ADA Self-Evaluation and Transition Plan process. During development of this Plan, people with disabilities, and those that provide assistance or services to others with disabilities, senior citizens, people with experience and knowledge of ADA planning and requirements, and other interested Lake Oswego residents participated in a stakeholder group. In March of 2022, an ADA stakeholder meeting was held to receive questions and comments and provide input on the prioritization of barriers. Participants shared their opinions and experiences related to City facilities, programs, and services as they relate to the ADA. The meeting agenda and notes are available on the City's website at <https://www.ci.oswego.or.us/ada/ada-self-evaluation-transition-plan-project>. This version of the Draft Plan has been made available for public comment in June 2022 through July 2022.

2 Self-Evaluation

Accessibility of the City's programs, activities, and services applies to all aspects of the City's offerings, including advertisement, eligibility, participation, testing or evaluation, physical access, provision of auxiliary aids, transportation, policies, and communication. The City of Lake Oswego undertook a self-evaluation that included a staff questionnaire, a review of City policies and practices, and an evaluation of the City's standards and specifications. The self-evaluation process identified barriers and provided a mechanism for developing strategies and recommendations to correct policies and practices that are inconsistent with title II regulations and result in limitations to access for people with disabilities. This section summarizes the outcomes of this effort. The recommendations contained in this section will serve as a basis for the implementation of specific strategies that will improve access to City programs, as required by law.

2.1 Programmatic Modifications

The ADA Coordinator, or designee, will follow-up with each department to review the recommendations contained in the self-evaluation (28 CFR 35.105). In those situations where a policy, program, or procedure creates a barrier to accessibility that is unique to a department or a certain program, the ADA Coordinator, or designee, will coordinate with the program manager to address the removal of the barrier in the most reasonable and accommodating manner in accordance with applicable law.

2.2 Program Accessibility and Policy Review Summary

The two primary components of the City's self-evaluation are a program accessibility questionnaire administered to City staff and a complementary evaluation of the City's services, policies, and practices. The review included the Municipal Code, policies and administrative rules for departments, planning, and other public documents, forms and applications, and a wide range of the City's programmatic offerings, and the City's standards and specifications. The results of the analysis serve as a basis for implementation of specific improvements for improving access to City programs as required by the ADA. The reviewed services, policies, and practices were provided to the City in an ADA Self-Evaluation of Policies, Programs, and Activities report available under separate cover upon request.

The recommendations in this Plan are organized into categories based on the requirements of title II of the ADA.

- Notice, Responsible Employee, and Grievance Procedure;
- Customer Service;
- Staff Training;
- Contracting, Licensing, or Other Arrangements;
- Public Meetings;
- Program Participation;
- Transportation Services;
- Tours and Trips;
- Accessible and Adaptive Equipment;
- Printed and Online Materials;
- Website;
- Televised and Audiovisual Information;
- Telecommunications;
- Emergency Planning; and
- Facilities.

Required actions are listed based on the ADA legislation for accessibility. Some actions are always required, such as posting a notice of nondiscrimination, while other actions are only required when requested, such as providing alternative formats like large print agendas. In many cases, the City has many alternatives in selecting methods for providing accessible programs, activities, and services. Recommended actions for implementation are also provided to help ensure requirements are met. The City has resources such as the Department of Justice toolkit of best practices located at www.ada.gov/pccatoolkit/toolkitmain.htm to assist in determining appropriate approaches to the implementation of this Plan.

Notice, Responsible Employee, and Grievance Procedure

Title II regulations require the City to inform the public of the rights and protections provided by the ADA for access to public programs, services, and activities. It is the obligation of the head of the public entity to determine the most effective way of providing notice to the public about their rights and the public entity's responsibilities under the ADA. Publishing and publicizing the ADA notice is not a one-time requirement. Public agencies should provide the information on an ongoing basis and update the information whenever necessary.

Additionally, title II of the ADA requires a state or local government agency that employs 50 or more people to develop and publish an ADA grievance procedure and to designate at least one employee. In Lake Oswego, the ADA Coordinator is responsible for the coordination of the City's efforts to implement the self-evaluation and transition plan. The ADA Coordinator is also responsible for investigating any complaints that the City has engaged in an action prohibited by title II and is often responsible for communicating the City's efforts to comply with and fulfill its responsibilities under title II of the ADA.

The City has provided notice of nondiscrimination on the basis of disability, the ADA grievance procedure, and identifies the ADA Coordinator whose name, office address, and telephone number are provided on the City's website (<https://www.ci.oswego.or.us/ada>).

Required Actions

- Continue to provide the name and contact information for the City's employee responsible for ensuring the City meets its ADA obligations under title II to staff and the public (28 CFR 35.107).
- Continue to provide a public notice of the City's commitment to providing accessible services public (28 CFR 35.106).
- Provide information about the existence and location of accessible services, programs, activities, and facilities (28 CFR 35.163).
- Continue to publish a grievance procedure to provide fair and prompt resolution of accessibility-related complaints (28 CFR 35.107).
- Ensure that people claiming a violation of title II are not retaliated against or discriminated against for making such a claim (28 CFR 35.134).
- Department of Transportation fund recipients and subrecipients must keep complaints on file for one year and maintain a record, which may be in summary form, for five years (49 CFR 27.121 (b)).

Implementation Strategies

- Maintain the citywide page to address and inform the public on the city's obligation under title II of the ADA. The citywide page serves to provide a one-stop portal for access to the ADA notice, ADA Coordinator, requests for auxiliary aids and services, program modifications, the complaint process, self-evaluation and transition plan documents, and other city efforts regarding accessibility.
- Continue to provide notice of the availability of program modifications, alternative formats of materials, and auxiliary aids. Include contact information for staff who can provide assistance. Establish a standardized advanced notice requirement and publicize.
- Include a nondiscrimination notice in city publications, similar to the following:

The City of Lake Oswego does not discriminate on the basis of disability in the admissions or access to its programs or activities. An ADA Coordinator has been designated to coordinate compliance with the nondiscrimination requirements contained in the Department of Justice regulations implementing Subtitle A of title II of the Americans with Disabilities Act (42 U.S.C. 12131-12134), which prohibits discrimination on the basis on disability by public agencies. Kelli Byrd, ADA Coordinator, 380 A Avenue, 2nd Floor, Lake Oswego, OR 97034 phone 503-635-0282, TTY/711, or email: ada@ci.oswego.or.us

- Republish and rebroadcast radio, newspaper, television, or mailings of the notice periodically, as applicable.
- Increase outreach to people with disabilities and the organizations that serve them to provide information about possible modifications and the accessibility of services, programs, and activities.
- Ensure staff is aware of the public locations of the nondiscrimination statement and the procedure for filing a disability discrimination or grievance complaint.

Staff Training

As a part of the City's ongoing staff development and training, the incorporation of disabilities awareness, standards, and resources is encouraged for all staff interfacing with the public or who maintain the facilities used by the public.

Required Actions

- Ensure that city staff is knowledgeable about obligations, policies, and procedures for providing accessible services, programs, and activities to the public. (28 CFR 35.130; 28 CFR 35.160)
- Ensure that city staff is knowledgeable about procedures for responding to requests for modifications. (28 CFR 35.160)
- Ensure that city staff is knowledgeable about construction and maintenance of accessible facilities. (28 CFR 35.133)

Implementation Strategies

- Develop and disseminate best practice resources for staff, similar to LOPR's *Inclusive Recreation Handbook* or Police Department *Policy 370: Communications with Persons with Disabilities*, to formalize the City's approach to addressing accessibility concerns.
- Provide all city staff with ongoing awareness and sensitivity training.
- Develop a comprehensive disability access training program. Educate city staff about their responsibilities under the ADA. The City's ADA coordinator or city supervisors should be responsible for ensuring that staff members receive training. Staff members who have contact with the public should receive additional training about the process of providing modifications and assistive devices to make their programs, activities, and services accessible. Ensure that training also includes information about responding to a variety of disabilities and the availability of program-specific adaptations, assistive devices, and modifications.
- Develop standard guidelines for training materials. These guidelines should include standard language that appropriately describes the city's policy on inclusion and nondiscrimination. Staff members should receive training in using the guidelines effectively.
- Offer training to staff members that have contact with the public and wish to learn basic ASL communication skills. Training should emphasize basic communication and should not be viewed as a substitute for utilizing qualified ASL interpreters when requested.
- Train maintenance staff regarding accessibility compliance and building codes to maintain facilities in an accessible condition.
- Incorporate assistance for people with disabilities into training for building evacuation procedures.

Contracting, Licensing, or Other Arrangements

All events on public property should be accessible to people with disabilities. Many public agencies rely on contractors, licensees, consultants, and other entities to deliver City services. These entities are considered an extension of the City's services and must adhere to the same ADA regulations as the City.

Required Actions

- Ensure that contractors, licensees, consultants, and other entities providing or delivering services for the city adhere to the same ADA regulations as the City (28 CFR 35.130).
- Ensure the city selects procurement contractors using criteria that does not discriminate on the basis of disability (28 CFR 35.130).
- Maintain City facilities in an accessible order to help ensure the accessibility of events held by public and private organizations (28 CFR 35.133).

Implementation Strategies

- Ensure contractors, licensees, and other entities providing services to the public are aware of their obligation to make City programs and activities accessible. Provide checklists, resources, contractual language, or other means to help them understand and meet their obligations.
- Monitor public programs and activities provided by contractors, licensees, and other entities to ensure continued accessibility. Provide staff with resources for conducting this review.
- Inform organizations that coordinate or sponsor events at City facilities about applicable ADA requirements.

Public Meetings

Public meetings are a regularly occurring activity for public agencies. Any public meeting's main objective is to impart and solicit information on issues of importance to the local government. Where these meetings are held is one of the essential considerations for meetings under the ADA requirements.

Required Actions

- Continue to ensure that public meetings are held in accessible facilities (28 CFR 35.160).
- Provide agendas and other meeting materials in alternative formats upon request (28 CFR 35.160).
- Provide flexibility in the time limit on speaking for individuals with communication difficulties (28 CFR 35.160).
- Ensure that assistive listening devices are available for public meetings where the sound at the meeting is amplified (28 CFR 35.160; 2010 Standards 219.2 Required Systems).
- Provide the opportunity to participate in public meetings remotely using technology such as a telephone, video, or other digital means and when oral and written testimony is allowed, provide a similar means of participation remotely. (OR HB 2560-A)

Implementation Strategies

- When possible, share meeting content before the meeting and allow the submission of questions in advance of the meeting.
- Display a notice on meeting agendas and web pages providing agendas and other meeting materials, indicating the availability of alternative formats of meeting materials and other elements of meeting participation.
- Prepare a list of accessible meeting spaces to facilitate the scheduling of meetings or the relocation of meetings as needed upon request.
- Maintain a list of on-call ASL interpreters who can attend meetings upon request to assist individuals who are deaf or have hearing loss.
- Develop a checklist and provide instruction to staff on ensuring the accessibility of meetings. Guidelines should include examples of the types of modification requests that may be made by people with different types of disabilities, including assistive listening systems, sign language interpreters, readers, descriptive services, and other assistive technologies like real-time captioning. Other considerations include the layout of the room and the locations of the sign-in and refreshments tables, bathrooms, and other elements to ensure these features are accessible.
- Assign a member of staff as a greeter at public meetings and events. Identify this person as a resource for people who may require assistance.

Program Participation

The public must be able to access all programs, services, and activities, regardless of disability, unless a modification would result in a fundamental alteration to the nature of a service, program, or activity or impose undue financial and administrative burdens (28 CFR 35.164). Admission criteria, ability to complete forms, and participation in interviews must be available to all public members by providing reasonable modifications.

Required Actions

- Provide reasonable modifications to program participants with disabilities to include them in regular programs to the maximum extent possible. Do not require the use of different or separate aids, benefits, or services, even if they are as effective as those provided to other individuals (28 CFR 35.130).
- Modify standard policies, practices, or procedures to avoid discrimination unless the modification would fundamentally alter the nature of the program, result in an undue financial or administrative burden, or create a hazardous situation for the participant or others (28 CFR 35.130).
- Ensure that if the City determines it is necessary to exclude or limit the participation of people with disabilities to ensure the safe operation of programs or services, it bases those determinations on real risks, not on speculation, stereotypes, or generalizations (28 CFR 35.130).
- Ensure that surcharges are not placed on people with disabilities to cover the costs of aids, modifications, or program accessibility (28 CFR 35.130).
- Ensure that when interviews are required for program participation, they are held in an accessible location and that alternative formats or auxiliary aids are provided upon request (28 CFR 35.164; 28 CFR 35.160).

Implementation Strategies

- Increase outreach to people with disabilities and the organizations that serve them to ensure program accessibility. The City should also inform the public of the possible modifications that can be provided to make programs, services, and activities accessible.
- Include a nondiscrimination statement and a notice of alternative formats on application or registration forms.
- Periodically review program eligibility requirements to ensure accessibility proactively. Develop strategies for modifications as appropriate.
- Review requirements of City volunteer programs to ensure that people with disabilities are included to the maximum extent possible.

Transportation Services

Many public agencies provide public transportation services. The public accommodation standards for these services are set forth by the Federal Transit Administration under Title 49, Subtitle A, Part 38 - Americans with Disabilities Act Accessibility Specifications for Transportation Vehicles.

Required Actions

- Continue to make reasonable modifications in policies, practices, or procedures for transportation programs when the modifications are necessary to avoid discrimination on the basis of disability or to provide program accessibility to services (28 CFR 35.130, 49 CFR 38.1).

Implementation Strategies

- Periodically review transportation programs to proactively ensure accessibility. Develop strategies for modifications as appropriate.

Tours and Trips

Many public agencies provide or facilitate tours and trips as part of their service. These tours and trips are subject to title II regulations. The City is responsible for ensuring that people with disabilities can experience the tour by making modifications upon request.

Required Actions

- Modify tours and trips upon request to enable people with disabilities to participate (28 CFR 35.130).

Implementation Strategies

- Incorporate opportunities to request accessibility modifications in registration materials for tours or trips.
- Provide information to participants in advance of a tour or trip regarding the destination, transportation method, and other characteristics of the activity so that informed requests for modifications can be made.
- Evaluate the destination of tours or trips and the means of transportation to determine accessibility and any modifications that may be required. If a tour route or a portion of a route is inaccessible and modifications are requested, reroute the tour or provide program modifications that will allow the tour to be experienced (for example, photographs, videos with closed captioning).

Accessible and Adaptive Equipment

Adaptive aids are devices, controls, appliances, or items that make it possible for people with disabilities to improve their ability to function independently and participate in programs, services, and activities offered by the City. For example, a pen, note pad, and clipboard provided to a person with a speech disability to write notes for brief communication or electronic equipment such as an accessible computer station are considered adaptive equipment.

Required Actions

- Provide and maintain, in working order, accessible equipment for people with disabilities when equipment is provided to the public. (28 CFR 35.133)
- Make reasonable modifications to avoid discrimination on the basis of disability unless the modifications would fundamentally alter the nature of the service, program, or activity. (28 CFR 35.130)
- Provide appropriate auxiliary aids and services in a timely manner, giving primary consideration to the request of the individual with the disability. (28 CFR 35.160)

Implementation Strategies

- Include accessibility as a criterion for purchasing equipment such as furniture, site furnishings, and office systems. Whenever possible, evaluate furniture and building material purchases for compatibility with a wide range of disabilities and sensitivities.
- Review equipment provided by the city for use by the public, such as computers, copy machines, telephones, etc., to identify potential barriers to accessibility and corresponding solutions.
- Collaborate with community organizations that serve people with disabilities to develop and maintain a resource list of assistive technology and accessible equipment.
- Establish and maintain a toolkit of adaptive aids and resources for staff who interact with the public. Include information about both onsite and contracted services.

Printed and Online Materials

Many public agencies develop and distribute a wide range of materials in printed and online formats. To meet the ADA's effective communication standards (28 CFR 35.160 through 35.164), the City must be able to provide alternative formats such as easy-to-understand language, braille, large print, audiotape or CD, computer media, or other formats, when requested. This responsibility extends to outside contractors and vendors who develop materials on behalf of the City.

Required Actions

- Ensure alternative formats to printed and online information is made available upon request, addressing each request on an individual basis (28 CFR 35.160).
- Ensure assistance is provided upon request in filling out forms when alternative formats are unavailable or infeasible (28 CFR 35.130).
- Continue to ensure that costs for alternative formats and modifications are not assigned to a person with a disability making the request (28 CFR 35.130).

Implementation Strategies

- Include a notice on public materials printed by the City, similar to the following:
This publication can be made available in alternative formats, such as large print, braille, or electronic format. Requests can be made by calling the ADA Coordinator at 503-635-0282 (voice) or by using the 711 Telecommunications Relay Service, or email at ada@lakeoswego.city Please allow 72 hours for your request to be processed.
- Develop a formal standard for the accessibility of printed and online materials and create or identify resources for achieving this standard across all departments. Ensure that this standard includes oversight for externally created materials and strategies for making existing online materials accessible.
- Develop and implement standard templates for producing accessible City materials that are consistent with City branding and style.
- Train staff to provide printed and online information in alternative formats for people with various disabilities to ensure that requests are handled in a uniform and consistent manner. Incorporate strategies for materials with complex language or other elements such as charts, graphs, maps, and other images.
- Include images of people with disabilities when images of people are included in City printed materials.

Website

As people turn to the internet as their primary source of information regarding services, programs, activities, and facilities, the City's website takes on increased importance as a communications tool. Providing public access to City publications online is an effective means of reaching people with disabilities. (www.ada.gov/websites2.htm) Accessibility standards for electronic and information technology covered by Section 508 of the Rehabilitation Act Amendments of 1998 have set forth the technical and functional performance criteria necessary for such technology to be accessible (Title 29, Chapter 16, § 794d). As of 2018, the technical requirements of Section 508 incorporate the Web Content Accessibility Guidelines (WCAG), including WCAG 2.0 A and AA. The WCAG guidelines are considered the best practice for web accessibility and provide the industry standards for accessible web content. In March of 2022, the DOJ updated the guidance on accessible websites for title II entities reaffirming websites and their content must be in compliance with the ADA to provide equal access and effective communication.

Required Actions

- Take appropriate steps to ensure that the city's online communication with people with disabilities is as effective as other communications with the public and ensure compliance with Section 508 digital accessibility standards (28 CFR 35.160).
- Ensure that people with disabilities are not excluded from participating in or benefitting from the City's online services, programs, or activities (28 CFR 35.160).

Implementation Strategies

- Provide information on the city website about the accessibility of the City's website.
- Acquire the technological resources or staffing expertise to create accessible digital documents for posting on the city website.
- Develop a formal standard for website accessibility and create or identify resources for achieving this standard across all departments. Ensure that this standard includes oversight for externally created web pages and incorporates strategies for making accessibility updates to existing web pages.
- Periodically conduct web accessibility analyses to measure the accessibility of the city's websites periodically. Consider adopting standards that meet or exceed WCAG 2.0 A and AA for the accessibility of electronic information.

Televised and Audiovisual Information

Televised and audiovisual information is a means for disseminating public information through presentations produced by the City. All televised and audiovisual information, including PowerPoint presentations, must be accessible to people with disabilities. As more communication is done remotely through the internet, it is increasingly important that all communication tools maintain accessibility as technology changes.

Required Actions

- Provide alternative formats upon request to audiovisual presentations produced by the City or its contractors or vendors (28 CFR 35.160).
- Ensure that televised and audiovisual communications with people with disabilities is as effective as televised and audiovisual communications with others (28 CFR 35.160).

Implementation Strategies

- Review City presentations, videos, and recordings of meetings to identify potential barriers to accessibility and corresponding solutions.
- Encourage presenters to read the slides and describe the graphic content when presenting PowerPoint or other visual presentations.

Telecommunications

Technological advances such as cell phones, texting, and instant messaging are changing the tools that many people use to communicate. However, provision of alternative communication technologies such as teletypewriters (TTY), telecommunication display devices (TDDs), or relay services (TRS) is still required under the ADA for communicating with the public.

Required Actions

- Ensure that staff is proficient in the use of alternative communication technologies such as TTY, TDDs, or TRS, or are able to direct the public to knowledgeable staff. (28 CFR 35.161)
- Ensure that city publications that list phone numbers also include information on how people who are deaf or who have hearing loss or speech disorders can communicate with the city by phone. (28 CFR 35.161; 28 CFR 35.163)
- Ensure that telecommunications with people with disabilities is as effective as communications with others (28 CFR 35.161; 28 CFR 35.163).
- Ensure that responses to calls from a telecommunications relay service are handled in the same manner as responding to other telephone calls.

Implementation Strategies

- Train staff on the use of alternative communication technologies.
- Explore options for Video Remote Interpreting Services (VRI) for communicating with people who are deaf, have hearing loss, or speech disorders. There are many situations where a live interpreter is required, such as in medical situations, but VRI can be a convenient, flexible, lower-cost alternative to live interpreters.

Emergency Planning

Life and safety protocols and procedures are required to include plans for people with disabilities. The City is responsible for ensuring that staff are aware of these procedures and are trained to implement them during an emergency. Issues that have the greatest impact on people with disabilities include:

- Notification;
- Evacuation;
- Emergency transportation;
- Access to medications, refrigeration, and back-up power;
- Access to their mobility devices or service animals while in transit; and
- Access to information.

In planning for emergency services, the City is required to develop strategies for notifying and assisting people with the widest range of disabilities. The City is responsible for ensuring that staff are aware of these procedures and are trained to implement them during an emergency.**Error! Bookmark not defined.**

Required Actions

- Include strategies for people with disabilities in various types of emergency situations when developing guidelines and a plan for emergency evacuations. (28 CFR 35.130; 28 CFR 35.149)
- Train staff to safely evacuate people with disabilities in various types of emergency situations when developing guidelines and a plan for emergency evacuations. (28 CFR 35.130; 28 CFR 35.149)
- Provide direct access to telephone emergency services, including 911 services, for people who use TDD's and computer modems. (28 CFR 35.162)
- If the City becomes involved in providing emergency shelters, provide emergency sheltering programs that are accessible to people with disabilities. (28 CFR 35.130; 28 CFR 35.149)

Implementation Strategies

- Incorporate the following elements into emergency planning:
 - Address what to do when an alarm is triggered;
 - Establish meeting places for assistance and evacuation chairs;
 - Provide direction on what to do if assistance is not available; and
 - Establish floor captains.
- Test the City's emergency plan and evacuation procedures with periodic drills, both announced and unannounced. Enlist people with different disabilities to role-play during emergency simulations.
- Review existing procedures dealing with emergencies to ensure that people with disabilities can be alerted and that they can alert emergency service providers.
- Work with disability organizations to explore the use of technologies such as audible exit signs for orientation and direction or vibrating paging systems.
- Develop plans that consider the needs of people using mobility aids such as wheelchairs, walkers, canes, crutches, or other power-driven mobility devices, or those with limited stamina. Plans should also address those who use oxygen or respirators, those who are blind or have low vision, people who are deaf or have hearing loss, people who have a cognitive disability, people with mental illness, and those with other types of disabilities.

Facilities

City facilities should be accessible to people with different types of disabilities. A public entity is not necessarily required to make each of its existing facilities accessible, where other methods are effective in achieving program access. However, they must ensure that each service, program, or activity, when viewed in its entirety (28 CFR 35.150), is readily accessible to and usable by individuals with disabilities. The identification of structural barriers in facilities such as buildings, parks, and the public rights-of-way are a required element of an ADA Transition Plan.

Required Actions

- Ensure that the public can obtain information regarding the existence and location of accessible facilities, entrances, and elements within facilities (28 CFR 35.163).
- Provide and maintain, in working order, features of facilities required to be accessible and usable for people with disabilities (28 CFR 35.133).
- Ensure that people with disabilities are not excluded from programs due to the inaccessibility of City facilities (28 CFR 35.149).
- Prioritize methods of achieving facility accessibility that offer the most integrated setting appropriate for people with disabilities (28 CFR 35.149).
- Design and construct new facilities or new parts of facilities to meet accessibility requirements (28 CFR 35.151(a)).
- Ensure that alterations to facilities meet accessibility requirements to the maximum extent feasible (28 CFR 35.151(b)).
- Make reasonable modifications to permit the use of mobility devices, including other power-driven mobility devices, unless they cannot be operated in accordance with the City's adopted safety requirements for pedestrian facilities (28 CFR 35.137(b)(1)).

Implementation Strategies

- Provide information about the accessibility of City-owned and operated facilities on city publications, including city websites. This can include details about accessible entrances, bathrooms, and other elements.
- Provide information about the accessibility of non-City facilities hosting City programs and services and City-owned facilities that are leased to other entities.
- Record and monitor requests relating to facility access. The ADA Coordinator can analyze accessibility requests periodically to look for global issues that can be addressed and problems than can be solved proactively.
- Develop formal standards for integrating ADA requirements into the design, construction, maintenance, and inspection of all Lake Oswego facilities. As part of this effort, develop and implement standards for enforcing accessibility provisions for contractors, consultants, vendors, etc. who design, construct, maintain, and inspect Lake Oswego facilities.
- Identify or hire staff members tasked with accessibility plan review.

3 Transition Plan

Title II of the ADA requires that public entities having responsibility for or authority over facilities, streets, roads, sidewalks, or other areas meant for public use to develop a transition plan to ensure their facilities meet the standards for program accessibility. Program accessibility means that a program, activity, or service provided to the public is accessible when viewed in its entirety. Simply put, a transition plan assists in turning inaccessible facilities into environments that are accessible to and useable by individuals with disabilities.

The process of developing an ADA transition plan includes the identification of access barriers within the built environment. The transition plan for the removal of structural barriers to program access must contain the following information:

- Identification of the barriers to program access;
- Identification of the specific barrier removal action(s);
- Identification of a schedule for barrier removal; and
- Identification of responsibility for ensuring barrier removal.

This transition plan addresses facilities under the City's ownership and maintenance responsibility and is organized into two parts: 1) parks, buildings, and parking facilities (Section 3.1), and 2) the public right-of-way (Section 3.2), which includes curb ramps, sidewalks, on-street parking, and pedestrian signal pushbuttons that fall within the City's area of responsibility.

3.1 Park and Building Facilities

The process of developing an American with Disabilities Act (ADA) Transition Plan includes identifying access barriers within the built environment. In late 2020 and early 2021, the City of Lake Oswego evaluated the buildings, parking facilities, and parks where City programs, activities, and services are provided. The evaluation included locations not owned by the City but where programs, activities, and services are provided. For new City facilities in the process of construction, MIG conducted plan reviews instead of physical evaluations, with recommendations submitted separately to the City. These sites include the new Adult Community Center, City Hall, Tennis Center, and the proposed new Recreation and Aquatics Center.

Accessibility Standards

At the time of the facility evaluations, the 2010 ADA Standards, the 2015 Architectural Barriers Act (ABA) Standards for Outdoor Developed Areas, and the 2019 Oregon Structural Specialty Code (OSSC), Chapter 11 Accessibility that incorporates by reference ICC A117.1-2009 Accessible and Usable Buildings and Facilities and the Oregon Transportation Commission Standards for Accessible Parking Places August 2018, were used to identify barriers at City facilities. Building codes and standards are revised every few years. The barrier evaluations

conducted provide an assessment of current conditions as viewed by the current code and provide a baseline for future barrier removal.

Facility Assessments

The barrier assessments for buildings, parking facilities, and parks included all public interior and exterior elements of a site. The assessments identified physical barriers in each facility that limit accessibility and compared each facility to the 2010 ADA, 2019 OSSC and the 2015 ABA. Evaluations were undertaken using a consultant team equipped with measuring devices, City facility data, and evaluation checklists. Diagrams and maps of each site were annotated during the evaluation process and were included with the ADA Facility Assessment Report, available from the City. The ADA Facility Assessment Reports are a snapshot in time of the facility at the time of evaluation. The reports do not reflect the dates or history of construction or alterations of City facilities.

The elements included in the evaluations are as follows:

- Assembly Areas
- Boating Facilities
- Built-in Elements
- Corridors/Aisles
- Curb Ramps
- Doors/Gates
- Drinking Fountains
- Eating Areas
- Elevators
- Fishing Piers and Platforms
- Golf Course
- Hazards
- Lavatory/Sink
- Libraries
- Other Features
- Outdoor Constructed Features
- Outdoor Recreation Access Routes
- Outdoor Recreation Trails
- Parking Areas
- Passenger Loading Zones
- Picnic Areas
- Play Equipment Areas
- Programmatic Elements
- Ramps
- Restrooms
- Rooms
- Signs
- Stairways
- View Areas
- Walks

A summary of the barriers identified within the City's buildings, parking facilities, and parks is included in the next section of this report.

Identifying a feature that does not comply with the current access codes and standards does not automatically mean that the feature must be modified. Factors such as whether the feature complied with the standard at the time of its construction and/or the availability of similar programs, services, or activities provided at the same or other facilities must be considered to determine the approach to removing accessibility barriers.

Facility Barrier Categorization

The removal of accessibility barriers is guided by a categorization process referenced in the ADA regulations. The principle is to ensure that basic access is provided, access to activities is provided, amenities are accessible, and alternatives to architectural modifications are allowed when appropriate. Translating these categories into action plans must be accomplished using a programmatic approach. The site priorities are divided into four categories:

- **Category One:** The highest category is placed on those barrier removal items that provide accessibility at the main entrance of a facility or improve an accessible route to the portion of the facility where program activities take place (e.g., parking, walks, ramps, doors, etc.).
- **Category Two:** A second category is placed on those barrier removal items that improve or enhance access to program use areas (e.g., transaction counters, conference rooms, public offices, restrooms, etc.).
- **Category Three:** A third category is placed on those barrier removal items that improve access to amenities serving program areas (e.g., drinking fountains, telephones, site furnishings).
- **Category Four:** A fourth category identifies areas or features not required to be modified for accessibility (no public programs located in the area or a duplicate feature).

This categorization was applied to each identified barrier at Lake Oswego buildings, parking facilities, and parks. Some barriers will require further evaluation by City staff for programmatic solutions. These barriers have been assigned two category values (i.e. "2 or 4"), indicating the barrier will need to be assigned one of the values but not both.

Priorities for Barrier Removal at City Facilities

To develop a phasing schedule for the removal of barriers at the City's facilities, prioritization criteria were developed with input from the ADA stakeholder group and prioritization meetings conducted with City staff. All facilities in which the City provides programs, activities, and services were reviewed based on the following criteria:

- **Identified Complaints or Requests:** Facilities with a history of citizen complaints or requests related to accessibility can be assigned a higher priority.
- **Level of Use by the Public:** Facilities that have a high level of public use are a higher priority.
- **Proximity to Transit Facilities:** Facilities that have access to transit facilities have a higher priority.
- **Program Uniqueness:** Some programs are unique to a building, facility, or population and cannot occur at another location.
- **Geographic Distribution:** By selecting a range of facilities that are distributed throughout the city, the city can ensure maximum access for all residents.
- **Citizen Rights and Responsibilities:** Facilities where services are provided to exercise citizen rights—participation in City Council and Commission meetings, access to elected officials, facilities where taxes are paid, permits, and licenses are obtained, etc.
- **Recognized User Groups:** Facilities where programs are serving youth, seniors, and people with special needs are provided.
- **Planned Obsolescence:** Identification of facilities with capital projects replacing the existing facility can be assigned a lower priority.

It is the intent of the City to address and remove barriers to accessibility in public buildings and parks based upon on the immediate necessity of programmatic access, degree of complexity, and overall cost.

Schedule for City Facility Improvements

This Plan proposes a 15-year strategy for removing barriers at City facilities that limit program accessibility. Barriers identified at City facilities will be removed systematically based on established program priorities. It is the intent of the City to address and remove barriers to accessibility at its facilities based on the need for programmatic access.

The barrier removal schedule is summarized on the following pages. It is the City's intent to review all barriers during the first three years of Plan implementation and address those barriers that can be resolved through programmatic modifications and maintenance tasks. The City will then revise the schedule for removal of the remaining barriers. It is also assumed that as facility barriers are evaluated in greater detail as part of future projects and complaints, a percentage of the barriers will fall within the safe harbor provisions, explained in Section 4 of this document. The City will then revise and update the inventory of barriers and, when applicable, revise the schedule for the removal of remaining barriers.

The transition plan phasing tables are organized by type of facility and represent an initial 15-year plan for barrier removal. The initial schedules were developed based on staff discussions and priorities described for facilities within this section.

Buildings, Parking Facilities, and Parks

The ADA evaluation included nine city owned buildings, three parking structures and three public parking lots, 24 city-owned parks, and a variety of leased program spaces. This section describes each site with a summary of barriers to accessibility, followed by the transition plan phasing schedule. Maps later in this section illustrate the location of the facilities.

Buildings

The evaluation included the following locations:

- Iron Workers Museum
- Jean Road Fire Station
- Lake Oswego Public Golf Course & Club House
- Library
- Main Fire Station
- Public Works/Maintenance Building
- South Shore Fire Station
- Water Treatment Plant
- Westlake Fire Station

The barriers are summarized for each location. An accessible route encompasses corridors/aisles, curb ramps, ramps, stairways, walks, etc. Program specific barriers include features that are typically unique to certain facilities, such as eating areas, outdoor constructed features, or library elements. Room elements include built-in elements.

Iron Workers Museum

This facility is located at 40 Wilbur Street.

- Barriers identified include the following features: parking, walks, doors/gates, and restrooms.

Jean Road Fire Station

This facility is located at 4555 Jean Road.

- Barriers identified include the following features: parking, hazards, doors/gates, built-in elements, and restrooms.

Lake Oswego Public Golf Course & Clubhouse

This facility is located at 17525 SW Stafford Road.

- Barriers identified include the following features: parking, curb ramps, walks, hazards, doors/gates, drinking fountains, built-in elements, restrooms, eating areas, outdoor constructed features, golf course elements, and other features.

Library

This facility is located at 706 4th Street.

- Barriers identified include the following features: parking, walks, ramps, stairways, doors/gates, hazards, drinking fountains, elevators, restrooms, and library elements.

Main Fire Station

This facility is located at 300 B Avenue.

- Barriers identified include the following features: parking, stairways, walks, hazards, doors/gates, restrooms, outdoor constructed features, and programmatic elements.

Public Works/Maintenance Building

This facility is located at 17601 Pilkington Road.

- Barriers identified include the following features: parking, walks, hazards, doors/gates, built-in elements, rooms, and restrooms.

South Shore Fire Station

This facility is located at 1880 South Shore Boulevard.

- Barriers identified include the following features: doors/gates and restrooms.

Water Treatment Plant

This facility is located at 4260 Kenthorpe Way in West Linn.

- Barriers identified include the following features: parking, walks, stairways, doors/gates, elevators, corridors/aisles, restrooms, and programmatic elements.

Westlake Fire Station

This facility is located at 4900 Melrose Street.

- Barriers identified include the following features: parking, walks, stairways, doors/gates, built-in elements, restrooms, and rooms.

In the tables on the following pages in this section the 'X' in the column indicates the barrier removal activities are planned and a blank cell indicates that barrier removal activities are not planned.

Table 1: Transition Plan Phasing Schedule for City Buildings

Facility	Years 1-3	Years 1-5	Years 1-10	Years 1-15
Iron Workers Museum	X		X	
Jean Road Fire Station	X	X	X	
Lake Oswego Public Golf Course & Club House	X	X		
Library	X	X	X	X
Main Fire Station	X	X	X	X
Public Works/Maintenance Building	X	X		
South Shore Fire Station	X	X		
Water Treatment Plant	X	X	X	
Westlake Fire Station	X	X	X	X

Public Parking Facilities

The evaluations included the following public parking facilities:

- Parking Lot - 1st Ave & B Avenue
- Parking Lot - 11 Foothills Road
- Parking Lot - 442 N State St
- Lakeview Parking Garage
- Trolley Station
- Windward Parking Garage

The barriers are summarized for each location. An accessible route encompasses curb ramps, ramps, hazards, stairways, walks, etc.

Parking Lot - 1st/B Ave

This parking facility has 25 total spaces with one accessible parking space.

- Barriers identified include the following features: parking and walks.

Parking Lot - 11 Foothills Road

This parking facility has 43 spaces and does not provide an accessible parking space.

- Barriers identified include the following features: parking and curb ramps.

Parking Lot - 442 N State Street

This parking facility has 16 spaces and does not provide an accessible parking space.

- Barriers identified include the following features: parking.

Lakeview Parking Garage

This parking facility has 365 total spaces with eight accessible parking spaces.

- Barriers identified include the following features: parking, hazards, ramps, doors/gates, and elevators.

Trolley Station

This facility is located at 311 N State Street.

- Barriers identified include the following features: parking, walks, hazards, doors/gates, built-in elements, restrooms, and outdoor constructed features.

Windward Parking Garage

This parking facility has 147 total spaces with six accessible parking spaces.

- Barriers identified include the following features: parking, hazards, and doors/gates.

Table 2: Transition Plan Phasing Schedule for Public Parking Facilities

Facility	Years 1-3	Years 1-5	Years 1-10	Years 1-15
Parking Lot - 1st and B Avenue	X		X	
Parking Lot - 11 Foothills Rd	X		X	
Parking Lot - 442 State Street	X	X		
Lakeview Parking Garage	X	X		
Trolley Station	X		X	
Winward Parking Garage	X	X		

Parks

The evaluations included the following locations:

- Bryant Woods Nature Park
- Charlie S. Brown Water Sports Center
- Foothills Park
- Freepons Park
- George Rogers Park
- Glenmorrie Park
- Greentree Park
- Hazelia Field
- Hide-A-Way Park
- Lake Oswego Swim Park
- Luscher Farm
- McNary Park
- Millenium Plaza Park
- Pilkington Park
- Pine Cone Park
- Roehr Park
- Rossman Park
- Stafford Basin/Rosemont Trail
- Sundeleaf Plaza
- Tryon Cove Park
- Waluga Park East
- Waluga Park West
- Westlake Park
- Westridge Park

The barrier assessment process did not include the evaluation of soft surface outdoor recreation trails and pathways, and the following park sites have no other developed public facilities:

- Canal Acres Park
- Cooks Butte Park
- River Run Park
- South Shore Natural Area
- Southwood Park
- Stevens Meadow

The barriers are summarized for each location. Accessible routes encompass curb ramps, ramps, stairways, walks, hazards, etc. Program specific barriers include features that are typically unique to certain facilities, such as built-in elements, assembly areas, fishing or boating facilities, trails, and other programmatic elements.

Bryant Woods Nature Park

Amenities at this park include a parking area and soft surface trails.

- Barriers identified include the following features: parking.

Charlie S. Brown Water Sports Center

Amenities at this park include a gangway and floating boat dock.

- Barriers identified include the following features: walks, outdoor constructed features, and boating facilities.

Foothills Park

Amenities at this park include river access for hand carry and larger boats, sweeping views of the Willamette River, a grass amphitheater, accessible restrooms, and a covered picnic area with a grill and fireplace.

- Barriers identified include the following features: parking, passenger loading zones, walks, doors/gates, drinking fountains, restrooms, picnic areas, outdoor constructed features, lavatory/sinks, and other features.

Freepons Park

Amenities at this community park include pathways, playground equipment, and picnic tables.

- Barriers identified include the following features: parking, walks, picnic areas, outdoor constructed features, play equipment areas, and other features.

George Rogers Park

Amenities at this community park include athletic fields, tennis/pickleball courts, a large playground, picnic shelters, river views and beach access, and restrooms.

- Barriers identified include the following features: parking, walks, ramps, hazards, doors/gates, drinking fountains, built-in elements, restrooms, game and sports areas, picnic areas, outdoor constructed features, outdoor recreation access routes, play equipment areas, and other features.

Glenmorrie Park

Amenities at this small neighborhood park include a pathway and playground.

- Barriers identified include the following features: walks, play equipment areas, and other features.

Greentree Park

Amenities at this mini park include a play area and half-court basketball court.

- Barriers identified include the following features: walks, game and sports areas, picnic areas, outdoor constructed features, play equipment areas, and other features.

Hazelia Field

Amenities at this park include two fenced dog parks, a large turf athletic field, a play area, and restrooms.

- Barriers identified include the following features: parking, walks, doors/gates, drinking fountains, restrooms, picnic areas, outdoor constructed features, play equipment areas, and other features.

Hide-A-Way Park

Amenities at this small neighborhood park include a pathway and playground.

- Barriers identified include the following features: walks, outdoor constructed features, and play equipment areas.

Lake Oswego Swim Park

Amenities at this park a lake swimming area accessed via steep hill.

- Barriers identified include the following features: programmatic elements.

Luscher Farm

Amenities at this facility include community gardens, a gravel parking area, barn and garage areas used for camp programming, picnic tables, and a clematis garden walking area.

- Barriers identified include the following features: parking, walks, doors/gates, restrooms, picnic areas, programmatic elements, and other features.

McNary Park

Amenities at this community park include a playground, pathways, and an off-leash dog area.

- Barriers identified include the following features: walks, outdoor constructed features, play equipment areas, and other features.

Millenium Plaza Park

Amenities at this downtown park include a paved plaza, tables, and restrooms.

- Barriers identified include the following features: ramps, hazards, doors/gates, drinking fountains, built-in elements, and restrooms.

Pilkington Park

Amenities at this neighborhood park include a playground, picnic tables, and an off-leash dog area.

- Barriers identified include the following features: parking, curb ramps, walks, drinking fountains, and picnic areas.

Pine Cone Park

Amenities at this small neighborhood park include a playground, pathway, and benches.

- Barriers identified include the following features: curb ramps, walks, outdoor constructed features, and play equipment areas.

Roehr Park

Amenities at this riverfront park include viewing decks, lighted pathways, benches, restrooms, an amphitheater, and access to the Charlie S. Brown Water Sports Center.

- Barriers identified include the following features: walks, ramps, doors/gates, drinking fountains, restrooms, assembly areas, picnic areas, outdoor constructed features, view areas, play equipment areas, fishing piers and platforms, and other features.

Rossmann Park

Amenities at this downtown neighborhood park include a covered picnic area, playground, pathways, and cornhole court.

- Barriers identified include the following features: curb ramps, walks, drinking fountains, game and sports areas, picnic areas, outdoor constructed features, play equipment areas, and other features.

Stafford Basin/Rosemont Trail

Amenities at this facility include a paved trail, interpretive features, and parking area.

- Barriers identified include the following features: parking, walks, picnic areas, trails, and other features.

Sundeleaf Plaza

Amenities at this urban park include restrooms, benches, and lake views.

- Barriers identified include the following features: hazards, doors/gates, and restrooms.

Tryon Cove Park

Amenities at this small riverfront park include picnic tables, a dock, and beach area.

- Barriers identified include the following features: parking, walks, picnic areas, outdoor recreation access routes, and boating facilities.

Waluga Park East

Amenities at this park include baseball fields, a playground, picnic shelter, and restrooms.

- Barriers identified include the following features: parking, curb ramps, walks, ramps, hazards, doors/gates, drinking fountains, built-in elements, rooms, restrooms, game and sports areas, picnic areas, outdoor constructed features, play equipment areas, and other features.

Waluga Park West

Amenities at this park include a walking path, fenced dog park, playground, fitness equipment, and covered picnic shelter.

- Barriers identified include the following features: parking, walks, doors/gates, drinking fountains, restrooms, picnic areas, play equipment areas, and other features.

Westlake Park

Amenities at this large athletic park include baseball/softball fields, soccer fields, tennis courts, full court basketball, a covered playground, covered picnic shelter, and restrooms.

- Barriers identified include the following features: parking, curb ramps, walks, ramps, stairways, hazards, doors/gates, drinking fountains, built-in elements, restrooms, game and sports areas, picnic areas, outdoor constructed features, play equipment areas, and other features.

Westridge Park

Amenities at this neighborhood park include pathways, a playground, and picnic table.

- Barriers identified include the following features: walks, drinking fountains, picnic areas, play equipment areas, and other features.

Table 3: Transition Plan Phasing Schedule for City Parks

Facility	Years 1-3	Years 1-5	Years 1-10	Years 1-15
Bryant Woods Nature Park	X		X	
Charlie S. Brown Water Sports Center	X		X	
Foothills Park	X	X		
Freepons Park	X			X
George Rogers Park	X	X		
Glenmorrie Park	X			X
Greentree Park	X			X
Hazelia Field	X	X		
Hide-A-Way Park	X			X
Lake Oswego Swim Park	X			X
Luscher Farm	X	X		
McNary Park	X			X
Millennium Plaza Park	X	X		
Pilkington Park	X		X	
Pine Cone Park	X			X
Roehr Park	X		X	
Rossman Park	X			X
Stafford Basin/Rosemont Trail	X		X	
Sundeleaf Plaza	X	X		
Tryon Cove Park	X			X
Waluga Park East	X	X		
Waluga Park West	X		X	
Westlake Park	X	X		
Westridge Park	X			X

Leased Facilities

In addition to City owned and maintained facilities, the City evaluated the program spaces of its leased facilities and locations where City programs are offered but the facility is not owned or managed by the City to ensure accessibility barriers are addressed. The programs in these facilities have been or will be relocated to an accessible location or the removal of barriers will be negotiated with the entity responsible for maintenance or alterations at the site. The following locations were evaluated:

- Academy of Ballet & Dance Arts
- Christ Church Episcopal Parish
- Forest Hills Elementary
- Greentree Art Studio
- Love Grove Elementary Athletic Field
- Lake Oswego Junior High
- Mary S. Young Park

In addition to the facilities listed above, the Lakewood Center for the Arts and the Oswego Heritage House were evaluated, but since the reopening of the Adult Community Center (ACC) the programs at these spaces have been relocated.

Academy of Ballet & Dance Arts

This facility is located at 311 B Avenue. The City contracts the services provided for Parks & Recreation programming.

- Barriers identified include the following features: parking, curb ramps, walks, ramps, stairways, doors/gates, elevators, drinking fountains, corridors/aisles, and restrooms.

Christ Church Episcopal Parish

This facility is located at 1060 Chandler Road. Parks & Recreation currently rents space at this location. The City anticipates moving most of its programming to the proposed Recreation and Aquatics Center when built.

- Barriers identified include the following features: parking, curb ramps, walks, ramps, stairways, hazards, doors/gates, drinking fountains, elevators, corridors/aisles, restrooms, and eating areas.

Forest Hills Elementary

This facility is located at 1133 Andrews Road. Parks & Recreation currently rents space at this location. The City anticipates moving its programming to the proposed Recreation and Aquatics Center when built.

- Barriers identified include the following features: parking, walks, and doors/gates.

Greentree Art Studio

This facility is located at 2766 Greentree Road. The City contracts the services provided for Parks & Recreation programming.

- Barriers identified include the following features: walks, doors/gates, and rooms.

Lake Grove Elementary Athletic Field

Amenities at this school facility include a softball field and parking area.

- Barriers identified include the following features: parking, walks, and game and sports areas.

Lake Oswego Junior High

This facility is located at 2500 Country Club Road. Parks & Recreation currently rents space at this location. The City anticipates moving its programming to the proposed Recreation and Aquatics Center when built.

- Barriers identified include the following features: parking, passenger loading zones, curb ramps, hazards, doors/gates, drinking fountains, corridors/aisles, rooms, and restrooms.

Mary S. Young Park

Amenities at this West Linn facility include a covered picnic shelter, restrooms, pathways, and trails leading to river access.

- Barriers identified include the following features: parking, curb ramps, walks, doors/gates, drinking fountains, restrooms, picnic areas, outdoor constructed features, trails, and other elements.

Approach for Barrier Removal at City Facilities

The City reserves the right to modify barrier removal priorities to allow flexibility in accommodating community requests, petitions for reasonable modifications from people with disabilities, changes in City programs, and funding opportunities and constraints. It is the goal of this Plan to provide access to the programs, activities, and services provided by the City. ADA regulations state that if a transition plan will take more than one year to fully implement, it must contain interim steps to provide program accessibility. Interim measures will be explored and implemented to provide better access for the public pending the implementation of major physical barrier removal projects. Interim measures in this Plan may include:

- relocating a program to an accessible facility,
- the installation of directional signs,
- the installation of a power door or lift,
- adjustments to operating mechanisms,
- temporary modifications that increase access, or
- other actions that enable better access.

The City will accomplish barrier removals in its buildings, parks, and parking facilities either through policy and procedure modifications to remove programmatic barriers, or maintenance and construction projects to remove structural barriers. The information contained in the ADA facility assessment reports has been incorporated into barrier analysis Excel workbook with companion facility GIS data, which is intended to be the living Transition Plan and the City's ongoing record of the remediation of barriers. The tracking tool will be updated over time as the City removes barriers or finds programmatic solutions to barriers. The record is maintained by the City's ADA Coordinator. For the current status of the remediation of barriers, contact the City's ADA Coordinator.

Projects Completed During the Plan's Development

- **WO 260**-Construction of the new City Hall was completed in September 2021. Accessibility, safety and sustainability were top priorities in the design of the new City Hall.
- **WO 295** - The Adult Community Center was remodeled to provide more accessibility throughout the building and a sound system was installed in the classrooms designed to enhance the audio for those with hearing aids. The building reopened in March 2022.
- **WO 308 & WO 309**- New ADA accessible bathrooms installed at lower George Rogers Park and East Waluga Park in 2021.

Please refer to the map addendum document for visualization. Below is the alternative text associated with the map.

Map 1: Evaluated Buildings and Parking Lots

This map illustrates the location of buildings and parking lots in Lake Oswego, assessed for the ADA self-evaluation and transition plan. Buildings and parking lot structures are marked by solid black dots and labeled by name with black text. For context, parks are filled in solid light green, streets are marked with light gray solid lines, water features are marked in a solid light blue, and the city limits are outlined in a dark green dash-and-dotted line. The north arrow points upwards and the scale bar indicates distance by quarter and half mile increments. The map was exported in June 2021.

Please refer to map addendum document for visualization. Below is the alternative text associated with the map.

Map 2: Evaluated Parks

This map illustrates the location of parks in Lake Oswego, assessed for the ADA self-evaluation and transition plan. Evaluated parks are marked by solid black dots and labelled by name with black text; they are also filled in a darker solid green. For context, trails are marked in a black dashed line, streets are marked with light gray solid lines, other unevaluated parks are filled in solid light green, water features are marked in a solid light blue, and the city limits are outlined in a dark green dash-and-dotted line. The legend also includes a note that “park features where Lake Oswego provides programs were evaluated at Mary S. Young Park located in West Linn.” The north arrow points upwards and the scale bar indicates distance by quarter and half mile increments. The map was exported in June 2021.

3.2 Facilities in the Public Right-of-Way

The City of Lake Oswego evaluated city maintained pedestrian access routes in the public right-of-way for ADA barriers in the summer and fall of 2020. The evaluations of right-of-way facilities were completed using a consultant team equipped with measuring devices, City facility data, and evaluation checklists. The accessibility barrier field observations were collected into a GIS database. The facilities evaluated include curb ramps, sidewalks, crosswalks, pedestrian pushbuttons, on-street parking, and pedestrian accessibility hazards. Pedestrian hazards include changes of level, driveway cross slopes greater than two percent, overhanging and protruding objects, openings greater than one-half inch or parallel to the direction of travel, obstacles that narrow the width of the accessible route, and surfaces that are not firm, stable, and slip-resistant. This section summarizes each of the types of facilities evaluated and the information collected.

Accessibility Standards

At the time of the facilities evaluations, the 2010 ADA Standards, 2011 Proposed Accessibility Guidelines for Pedestrian Facilities in the Public Right-of-Way (PROWAG), the 2009 r1 and r2 Manual on Uniform Traffic Control Devices (MUTCD), and the Oregon Transportation Commission Standards for Accessible Parking Places August 2018 were used to identify barriers at right-of-way facilities under the City's responsibility. Codes and standards are revised every few years and the barrier evaluations conducted provide an assessment of existing conditions as viewed by current code and provide a baseline for future barrier removal.

Public Right-of-Way Prioritization

Draft prioritization criteria for assigning the barrier removal phasing schedule were developed using title II regulation § 35.150(d)(2).

If a public entity has responsibility or authority over streets, roads, or walkways, its transition plan shall include a schedule for providing curb ramps or other sloped areas where pedestrian walks cross curbs, giving priority to walkways serving entities covered by the Act, including State and local government offices and facilities, transportation, places of public accommodation, and employers, followed by walkways serving other areas.

The draft prioritization criteria include the following:

- Locations serving government offices and public facilities;
- Locations serving transportation;
- Locations serving commercial districts and employers; and
- Locations serving other areas.

Priorities for Barrier Removal

Matrices on the following pages illustrate the prioritization criteria for curb ramps, pedestrian access routes, pedestrian crossing times and pushbuttons, and on-street parking barrier removal projects in the City's public right-of-way. Pedestrian access route information includes identified barriers along the sidewalks, crosswalks, and includes the identifications of hazards along the pedestrian route. Each facility evaluated was assigned a rank based on its barrier priority and category. The priority assigned is based on the aforementioned criteria and the barrier category is based on the condition of the facility. The descriptions for each category are provided after each matrix.

The highest ranked facilities are shaded in dark blue, medium ranked in a lighter shade of blue, and lower ranked in the lightest shade of blue. The facilities with no assigned rank have no access deficiencies identified have no assigned color. The columns in the matrix indicate the assigned priority and are in order of importance from left to right, with the left column having the highest importance. The rows indicate the category of condition assigned to each facility during the evaluation process, with the top row having the highest importance. Note that categories are hierarchical: higher level categories (i.e., one and two) may include lower-level category conditions (i.e., three and four), but lower-level categories cannot include higher level category conditions. The categories of barriers for curb ramps and pedestrian access routes have been organized by identified ADA barrier and by road classification. There are three road classifications within Lake Oswego and included arterial, collector, and local streets. Arterial streets have a higher volume and speed of vehicular traffic when compared to local streets. The pedestrian signals and pushbuttons categories are organized by ADA barrier and MUTCD standard and guidance. A standard in the MUTCD is required or mandatory to be followed and guidance in the MUTCD is recommended but not mandatory. Each matrix is followed by a description of the barrier categories; maps illustrating the locations of identified barriers by priority; and summary tables of the barrier removal priorities.

Curb Ramps

Table 4: Curb Ramp Priority Matrix - ADA 35.150(d) Geospatial Proximity Priorities

Note on Table 4: The priorities listed under columns B, C, D, and E are specified under title II 28 CFR § 35.150 (d).

Priorities (Category)	Priority Description	A: Location of Citizen ADA Complaint and/or Request	B: Location Serving Government Offices and Public Facilities	C: Location Serving Transportation	D: Location Serving Commercial Districts, Employers	E: Location Serving Other Areas
1	Refer to Category 1 Description	A1: High Priority	B1: High Priority	C1: High Priority	D1: High Priority	E1: Medium Priority
2	Refer to Category 2 Description	A2: High Priority	B2: High Priority	C2: Medium Priority	D2: Medium Priority	E2: Low Priority
3	Refer to Category 3 Description	A3: High Priority	B3: Medium Priority	C3: Medium Priority	D3: Medium Priority	E3: Low Priority
4	Refer to Category 4 Description	A4: High Priority	B4: Low Priority	C4: Low Priority	D4: Low Priority	E4: Low Priority
5	No Deficiencies Identified	A5	B5	C5	D5	E5

Table 5: Curb Ramp Category 1 Descriptions

Note on Table 5: This table expands upon Table 4: Curb Ramp Priority Matrix to further identify each ADA Barrier, corresponding road classification, and category within the priority matrix. The categories in this table are organized by road classification.

Identified ADA Barrier	Arterial Street	Collector Street	Local Street
The curb ramp is built-up in the travel lane.	Category 1	Category 1	Category 2
The curb ramp is significantly damaged or deteriorated and is unsafe.	Category 1	Category 1	Category 2
There is a sidewalk with no curb ramp access or there is an obstruction to accessing the curb ramp.	Category 1	Category 1	Category 2
The curb ramp has no detectable warning.	Category 1	Category 1	Category 2
Non-standard ramp type with non-compliant cross slope and/or ramp slope.	Category 1	Category 2	Category 3
The width and length of the pedestrian refuge island does not meet any standard.	Category 1	Category 2	Category 3
The curb ramp has no receiving ramp.	Category 1	Category 2	Category 3

Table 6: Curb Ramp Category 2 Descriptions

Note on Table 6: This table expands upon Table 4: Curb Ramp Priority Matrix to further identify each ADA Barrier, corresponding road classification, and category within the priority matrix. The categories in this table are organized by road classification.

Identified ADA Barrier	Arterial Street	Collector Street	Local Street
The curb ramp does not have a firm, stable, and slip resistance surface and/or has openings greater than a half-inch or parallel with the direction of travel.	Category 2	Category 3	Category 3
The curb ramp is not located within marked crossings (when present).	Category 2	Category 3	Category 3
Cross slope of ramp exceeds two percent.	Category 2	Category 3	Category 3
Running slope of ramp exceeds 8.33 percent.	Category 2	Category 3	Category 3
There is a grade break on the ramp surface.	Category 2	Category 3	Category 3
Cross slope of ramp exceeds two percent and grade of road when located midblock or at an intersection without yield or stop control.	Category 2	Category 3	Category 3
Slope of ramp flared sides (if applicable) exceeds 10 percent and is part of the circulation path	Category 2	Category 3	Category 3

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Width of ramp is less than 48 inches.	Category 2	Category 3	Category 3
A three-by-four-foot clear space at the bottom of the ramp outside of the travel lane is not provided.	Category 2	Category 3	Category 3
Curb ramp has turning space that does not meet any existing standards.	Category 2	Category 3	Category 3
The curb ramp has a lip or vertical discontinuity greater than a half-inch.	Category 2	Category 3	Category 3
The detectable warning provided meets no existing standard or is damaged.	Category 2	Category 3	Category 3
The length of surface between detectable warnings on a pedestrian refuge island is less than 24 inches.	Category 2	Category 3	Category 3

Table 7: Curb Ramp Category 3 Descriptions

Note on Table 7: This table expands upon Table 4: Curb Ramp Priority Matrix to further identify each ADA Barrier, corresponding road classification, and category within the priority matrix. The categories in this table are organized by road classification.

Identified ADA Barrier	Arterial Street	Collector Street	Local Street
Counter slope of the curb ramp is greater than five percent.	Category 3	Category 4	Category 4
Curb ramp with constrained turning space is less than four-by-five feet.	Category 3	Category 4	Category 4
Turning space is less than four-by-four feet.	Category 3	Category 4	Category 4
A four-by-four-foot clear space at the bottom of the ramp outside of the travel lane is not provided.	Category 3	Category 4	Category 4
The detectable warning provided does not meet PROWAG standard.	Category 3	Category 4	Category 4
Slope of ramp flared sides (if applicable) exceeds 8.33 percent and is less than or equal to 10 percent and is part of the circulation path.	Category 3	Category 4	Category 4

Table 8: Curb Ramp Category 4 Descriptions

Note on Table 8: This table expands upon Table 4: Curb Ramp Priority Matrix to further identify each ADA Barrier, corresponding road classification, and category within the priority matrix. The categories in this table are organized by road classification.

Identified ADA Barrier	Arterial Street	Collector Street	Local Street
The width and length of the pedestrian refuge island does not meet PROWAG standard.	Category 4	Category 4	Category 4
End of walk due to road terminating with no exit ramp.	Category 4	Category 4	Category 4
End of walk midblock with no exit ramp.	Category 4	Category 4	Category 4
The curb ramp has a lip or vertical discontinuity less than a half-inch.	Category 4	Category 4	Category 4
Turning space is not designed to prevent the accumulation of water.	Category 4	Category 4	Category 4
Slope of ramp flared sides (if applicable) exceeds 10 percent and is not a part of the circulation path.	Category 4	Category 4	Category 4

Table 9: Curb Ramp Category 5 Descriptions

Note on Table 9: This table expands upon Table 4: Curb Ramp Priority Matrix to further identify each ADA Barrier, corresponding road classification, and category within the priority matrix. The categories in this table are organized by road classification.

Identified ADA Barrier	Arterial Street	Collector Street	Local Street
No deficiencies identified.	Category 5	Category 5	Category 5
Shared diagonal perpendicular or shared parallel curb ramp design without existing physical constraints.	Category 5	Category 5	Category 5

Please refer to map addendum document for visualization. Below is the alternative text associated with the map.

Map 3: Curb Ramp Barrier Removal Projects

This map illustrates the location of curb ramp barrier removal projects in Lake Oswego, assessed for the ADA self-evaluation and transition plan. A series of colored dots mark the location of curb ramp barriers that are the responsibility of the City of Lake Oswego to remove, ranging from low priority to high priority, and including curb ramps with no deficiencies identified. High priority curb ramps are marked with an orange dot, medium priority curb ramps are marked with a yellow dot, low priority curb ramps are marked with a light blue dot, and curb ramps with no deficiencies are marked with a purple dot. For context, streets are marked in solid gray lines, parks are filled in solid light green, water features are filled in solid light blue, and the city limits are marked with a dark green dashed and dotted line. The north arrow points upwards and the scale bar indicates distance by quarter and half mile increments. The map was exported in January 2021.

Table 10: Curb Ramp Barrier Summary by Rank

Note on Table 10: This table expands upon Table 4: Curb Ramp Priority Matrix to further identify the number and percentage of curb ramps ranking from high to low in priority, and those with no deficiencies.

Rank	Total Curb Ramps	Percent of Total
High	323	14.7%
Medium	735	33.4%
Low	1054	47.9%
No Deficiency	88	4.0%
Total	2,200	100%

Table 11: Curb Ramp Barrier Summary by Rank and Category

Note on Table 11: This table expands upon Table 4: Curb Ramp Priority Matrix to further identify the number and percentage of curb ramps ranking from high to low in priority, and those with no deficiencies. It also includes categories ranked 1 through 5, with 1 being the highest priority, and the priority matrix ranking system ranging from A1 to E5.

Rank	Category	Priority	Total Curb Ramps	Percent of Total
High	1	B1	43	2.0%
High	1	C1	192	8.7%
High	1	D1	9	0.4%
High	1	B2	79	3.6%
Medium	1	E1	95	4.3%
Medium	2	C2	324	14.7%
Medium	2	D2	19	0.9%
Medium	2	B3	58	2.6%
Medium	2	C3	234	10.6%
Medium	2	D3	5	0.2%

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Low	2	E2	511	23.2%
Low	3	E3	170	7.7%
Low	4	B4	46	2.1%
Low	4	C4	143	6.5%
Low	4	D4	13	0.6%
Low	4	E4	171	7.8%
No Deficiencies	5	B5	19	0.9%
No Deficiencies	5	C5	54	2.5%
No Deficiencies	5	D5	1	0.0%
No Deficiencies	5	E5	14	0.6%

Pedestrian Access Routes

Table 12: Pedestrian Access Route Priority Matrix - ADA 35.150(d) Geospatial Proximity Priorities

Note on Table 12: The priorities listed under columns B, C, D, and E are specified under title II 28 CFR § 35.150 (d).

Priorities (Category)	Priority Description	A: Location of Citizen ADA Complaint and/or Request	B: Location Serving Government Offices and Public Facilities	C: Location Serving Transportation	D: Location Serving Commercial Districts, Employers	E: Location Serving Other Areas
1	Refer to Category 1 Description	A1: High Priority	B1: High Priority	C1: High Priority	D1: High Priority	E1: Medium Priority
2	Refer to Category 2 Description	A2: High Priority	B2: High Priority	C2: Medium Priority	D2: Medium Priority	E2: Low Priority
3	Refer to Category 3 Description	A3: High Priority	B3: Medium Priority	C3: Medium Priority	D3: Medium Priority	E3: Low Priority
4	Refer to Category 4 Description	A4: High Priority	B4: Low Priority	C4: Low Priority	D4: Low Priority	E4: Low Priority
5	No Deficiencies Identified	A5	B5	C5	D5	E5

Table 13: Pedestrian Access Route Category 1 Descriptions

Note on Table 13: This table expands upon Table 12: Pedestrian Access Route Priority Matrix to further identify each ADA Barrier, corresponding road classification, and category within the priority matrix. The categories in this table are organized by road classification.

Identified ADA Barrier	Arterial Street	Collector Street	Local Street
A detectable warning surface is not provided at the railroad crossing.	Category 1	Category 1	Category 1
Railroad flangeway gap is greater than three inches for freight rail or two and a half for non-freight rail.	Category 1	Category 1	Category 1
The sidewalk condition is poor with cracking, spalling, heaving, or other condition.	Category 1	Category 2	Category 2
The constructed width of the sidewalk width is less than 36 inches.	Category 1	Category 2	Category 2
The sidewalk cross slope is below two percent for less than one-quarter of its length.	Category 1	Category 2	Category 2
Running slope of crosswalk is greater than five percent.	Category 1	Category 2	Category 2

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Cross slope of crosswalk with yield or stop control is greater than two percent.	Category 1	Category 2	Category 2
Cross slope of crosswalk with no yield or stop control is greater than five percent.	Category 1	Category 2	Category 2
Crosswalk surface is not firm, stable, and slip resistant.	Category 1	Category 2	Category 2
The sidewalk surface is firm, stable, and slip-resistant for less than one-quarter of its length.	Category 1	Category 2	Category 2
The sidewalk has a significant number of vertical changes that exceed a quarter inch and openings greater than a half inch or are parallel to direction of travel (more than three per 100 feet).	Category 1	Category 2	Category 2
The sidewalk has a significant number of overhanging and protruding objects (more than one per 100 feet).	Category 1	Category 2	Category 2
The sidewalk has a significant number of driveway entries where cross slope exceeds two percent (more than two per 100 feet).	Category 1	Category 2	Category 2

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<p>The sidewalk has a significant number obstacles that narrow the width of the walk to less than four feet (more than one per 100 feet).</p>	<p>Category 1</p>	<p>Category 2</p>	<p>Category 2</p>
<p>The sidewalk has a significant number utility lids that are not slip-resistant (more than one per 100 feet).</p>	<p>Category 1</p>	<p>Category 2</p>	<p>Category 2</p>

Table 14: Pedestrian Access Route Category 2 Descriptions

Note on Table 14: This table expands upon Table 12: Pedestrian Access Route Priority Matrix to further identify each ADA Barrier, corresponding road classification, and category within the priority matrix. The categories in this table are organized by road classification.

Identified ADA Barrier	Arterial Street	Collector Street	Local Street
Detectable warning surface placement at rail crossing is less than six feet or greater than 15 feet.	Category 2	Category 2	Category 2
The constructed width of the sidewalk width is less than 48 inches but greater than 36 inches.	Category 2	Category 3	Category 3
The sidewalk has a significant number of instances where running slope exceeds grade of road and is >5.0% (more than one per 100 feet).	Category 2	Category 3	Category 3
The sidewalk cross slope is below two percent for one-quarter to one-half of its length.	Category 2	Category 3	Category 3
The sidewalk surface is firm, stable, and slip-resistant for one-quarter to one-half of its length.	Category 2	Category 3	Category 3

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The sidewalk has a significant number of vertical changes that exceed a quarter inch or openings greater than a half inch or are parallel to direction of travel (more than three per 100 feet).	Category 2	Category 3	Category 3
The sidewalk has a significant number of overhanging or protruding objects (more than one per 100 feet).	Category 2	Category 3	Category 3
The sidewalk has a significant number of driveway entries where cross slope exceeds two percent (more than one per 100 feet).	Category 2	Category 3	Category 3
The sidewalk has an obstacle that narrow the width of the walk to less than four feet (fewer than one per 100 feet).	Category 2	Category 3	Category 3
The sidewalk has utility lids that are not slip-resistant (fewer than one per 100 feet).	Category 2	Category 3	Category 3

Table 15: Pedestrian Access Route Category 3 Descriptions

Note on Table 15: This table expands upon Table 12: Pedestrian Access Route Priority Matrix to further identify each ADA Barrier, corresponding road classification, and category within the priority matrix. The categories in this table are organized by road classification. The categories in this table are organized by road classification.

Identified ADA Barrier	Arterial Street	Collector Street	Local Street
The sidewalk width is less than five feet without a passing space.	Category 3	Category 4	Category 4
The sidewalk has a number of instances where running slope exceeds grade of road and is >5.0% (fewer than one per 100 feet).	Category 3	Category 4	Category 4
The sidewalk cross slope is below two percent for one-half to three-quarters of its length.	Category 3	Category 4	Category 4
The sidewalk surface is firm, stable, and slip-resistant for one-half to three-quarters of its length.	Category 3	Category 4	Category 4
The sidewalk has vertical changes that exceed a quarter inch –or– openings greater than a half inch or are parallel to direction of travel (fewer than three per 100 feet).	Category 3	Category 4	Category 4

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The sidewalk has a significant number of overhanging –or– protruding objects (fewer than one per 100 feet).	Category 3	Category 4	Category 4
The sidewalk has a significant number of driveway entries where cross slope exceeds two percent (fewer than one per 100 feet).	Category 3	Category 4	Category 4

Table 16: Pedestrian Access Route Category 4 Descriptions

Note on Table 16: This table expands upon Table 12: Pedestrian Access Route Priority Matrix to further identify each ADA Barrier, corresponding road classification, and category within the priority matrix. The categories in this table are organized by road classification.

Identified ADA Barrier	Arterial Street	Collector Street	Local Street
The sidewalk cross slope is below two percent for three-quarters to its length.	Category 4	Category 4	Category 4
The sidewalk surface is firm, stable, and slip-resistant for three-quarters to its length.	Category 4	Category 4	Category 4

Table 17: Pedestrian Access Route Category 5 Descriptions

Note on Table 17: This table expands upon Table 12: Pedestrian Access Route Priority Matrix to further identify each ADA Barrier, corresponding road classification, and category within the priority matrix. The categories in this table are organized by road classification. The categories in this table are organized by road classification.

Identified ADA Barrier	Arterial Street	Collector Street	Local Street
No deficiencies identified.	Category 5	Category 5	Category 5

Please refer to map addendum document for visualization. Below is the alternative text associated with the map.

Map 4: Pedestrian Access Route Barrier Removal Projects: Sidewalks

This map illustrates the location of pedestrian access route barrier removal projects at sidewalks in Lake Oswego, assessed for the ADA self-evaluation and transition plan. A series of colored dots mark the location of sidewalk barriers that are the responsibility of the City of Lake Oswego to remove, ranging from low priority to high priority, and including access routes at sidewalks with no deficiencies identified. High priority sidewalks are marked with an orange dot, medium priority sidewalks are marked with a yellow dot, low priority sidewalks are marked with a light blue dot, and sidewalks with no deficiencies are marked with a purple dot. For context, streets are marked in solid gray lines, parks are filled in solid light green, water features are filled in solid light blue, and the city limits are marked with a dark green dashed and dotted line. The north arrow points upwards and the scale bar indicates distance by quarter and half mile increments. The map was exported in January 2021.

Please refer to map addendum document for visualization. Below is the alternative text associated with the map.

Map 5: Pedestrian Access Route Barrier Removal Projects: Crosswalks

This map illustrates the location of pedestrian access route barrier removal projects at crosswalks in Lake Oswego, assessed for the ADA self-evaluation and transition plan. A series of colored dots mark the location of crosswalk barriers that are the responsibility of the City of Lake Oswego to remove, ranging from medium priority to high priority, and including access routes at crosswalks with no deficiencies identified. High priority crosswalks are marked with an orange dot, medium priority crosswalks are marked with a yellow dot, and crosswalks with no deficiencies are marked with a purple dot. For context, streets are marked in solid gray lines, parks are filled in solid light green, water features are filled in solid light blue, and the city limits are marked with a dark green dashed and dotted line. The north arrow points upwards and the scale bar indicates distance by quarter and half mile increments. The map was exported in January 2021.

Please refer to map addendum document for visualization. Below is the alternative text associated with the map.

Map 6: Pedestrian Access Route Barrier Removal Projects: Railroad Crossings

This map illustrates the location of pedestrian access route barrier removal projects at railroad crossings in Lake Oswego, assessed for the ADA self-evaluation and transition plan. A series of colored dots mark the location of railroad crossing barriers that are the responsibility of the City of Lake Oswego to remove, which are high priority or with no deficiencies identified. High priority railroad crossings are marked with an orange dot and railroad crossings with no deficiencies are marked with a purple dot. For context, streets are marked in solid gray lines, parks are filled in solid light green, water features are filled in solid light blue, and the city limits are marked with a dark green dashed and dotted line. The north arrow points upwards and the scale bar indicates distance by quarter and half mile increments. The map was exported in January 2021.

Table 18: Pedestrian Access Route Barrier Summary by Rank - Sidewalks

Note on Table 18: This table expands upon Table 12: Pedestrian Access Route Priority Matrix to further identify the number and percentage of sidewalk segments ranking from high to low in priority, and those with no deficiencies.

Rank	Total Sidewalk Segments	Percent of Total
High	109	7.2%
Medium	510	33.8%
Low	851	56.5%
No Deficiency	37	2.5%
Total	1,507	100%

Table 19: Pedestrian Access Route Barrier Summary by Rank and Category - Sidewalks

Note on Table 19: This table expands upon Table 12: Pedestrian Access Route Priority Matrix to further identify the number and percentage of sidewalk miles ranking from high to low in priority, and those with no deficiencies. It also includes categories ranked 1 through 5, with 1 being the highest priority, and the priority matrix ranking system ranging from A1 to E5.

Rank	Category	Priority	Total Sidewalk Miles	Percent of Total
High	1	B1	15	1.0%
High	1	C1	48	3.2%
High	2	B2	46	3.1%
Medium	1	E1	2	0.1%
Medium	2	C2	270	17.9%
Medium	2	D2	13	0.9%
Medium	3	B3	45	3.0%
Medium	3	C3	176	11.7%
Medium	3	D3	4	0.3%
Low	2	E2	312	20.7%

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Low	3	E3	277	18.4%
Low	4	B4	30	2.0%
Low	4	C4	101	6.7%
Low	4	D4	7	0.5%
Low	4	E4	124	8.2%
No Deficiencies	5	B5	1	0.1%
No Deficiencies	5	C5	18	1.2%
No Deficiencies	5	E5	18	1.2%

Table 20: Pedestrian Access Route Barrier Summary by Rank - Crosswalks

Note on Table 20: This table expands upon Table 12: Pedestrian Access Route Priority Matrix to further identify the number and percentage of crosswalks ranking from high to low in priority, and those with no deficiencies.

Rank	Total Crosswalks	Percent of Total
High	102	9.2%
Medium	211	19.1%
Low	237	21.5%
No Deficiency	553	50.1%
Total	1,103	100%

Table 21: Pedestrian Access Route Barrier Summary by Rank and Category - Crosswalks

Note on Table 21: This table expands upon Table 12: Pedestrian Access Route Priority Matrix to further identify the number and percentage of crosswalks ranking from high to low in priority, and those with no deficiencies. It also includes categories ranked 1 through 5, with 1 being the highest priority, and the priority matrix ranking system ranging from A1 to E5.

Rank	Category	Priority	Total Crosswalks	Percent of Total
High	1	B1	18	1.6%
High	1	C1	46	4.2%
High	2	B2	38	3.4%
Medium	1	E1	3	0.3%
Medium	2	C2	202	18.3%
Medium	2	D2	6	0.5%
Low	2	E2	237	21.5%
No Deficiencies	5	B5	57	5.2%
No Deficiencies	5	C5	234	21.2%
No Deficiencies	5	D5	12	1.1%
No Deficiencies	5	E5	250	22.7%

Table 22: Pedestrian Access Route Barrier Summary by Rank – Railroad Crossings

Note on Table 22: This table expands upon Table 12: Pedestrian Access Route Priority Matrix to further identify the number and percentage of railroad crossings ranking from high to low in priority, and those with no deficiencies.

Rank	Total Railroad Crossings	Percent of Total
High	9	90.0%
No Deficiency	1	10.0%
Total	10	100%

Table 23: Pedestrian Access Route Barrier Summary by Rank and Category - Railroad Crossings

Note on Table 23: This table expands upon Table 12: Pedestrian Access Route Priority Matrix to further identify the number and percentage of railroad crossings ranking from high to low in priority, and those with no deficiencies. It also includes categories ranked 1 through 5, with 1 being the highest priority, and the priority matrix ranking system ranging from A1 to E5.

Rank	Category	Priority	Total Railroad Crossings	Percent of Total
High	1	B1	2	20.0%
High	1	C1	7	70.0%
No Deficiencies	5	C5	1	10.0%

Pedestrian Crossing Times and Pushbuttons

Table 24: Pedestrian Signals and Pushbuttons Priority Matrix - ADA 35.150(d) Geospatial Proximity Priorities.

Note on Table 24: The priorities listed under columns B, C, D, and E are specified under title II 28 CFR § 35.150 (d).

Priorities (Category)	Priority Description	A: Location of Citizen ADA Complaint and/or Request	B: Location Serving Government Offices and Public Facilities	C: Location Serving Transportation	D: Location Serving Commercial Districts, Employers	E: Location Serving Other Areas
1	Refer to Category 1 Description	A1: High Priority	B1: High Priority	C1: High Priority	D1: Medium Priority	E1: Medium Priority
2	Refer to Category 2 Description	A2: High Priority	B2: Medium Priority	C2: Medium Priority	D2: Medium Priority	E2: Low Priority
3	Refer to Category 3 Description	A3: High Priority	B3: Medium Priority	C3: Medium Priority	D3: Low Priority	E3: Low Priority
4	No Deficiencies Identified	A4	B4	C4	D4	E4

Table 25: Pedestrian Crossing Time and Pushbutton Barrier Descriptions

Category 1:

- Accessible pedestrian signal is not provided (PROWAG R209).
- Pedestrian crossing time is insufficient.

Category 2 (2009 MUTCD Standard):

- Level clear space at push button not provided.
- Reach to push button from clear space is obstructed.
- Operating force of pushbutton exceeds five pounds of force.
- The pushbutton does not have a sign adjacent to or integral with the pushbutton.
- Pushbutton sign does not clearly indicate which crosswalk signal is actuated.
- Pushbutton pilot light (if applicable) does not activate.
- A locator tone is not provided.
- A tactile arrow is not provided.
- Pushbutton locator tone activates or deactivates at incorrect time.
- Pushbutton locator tone duration and intensity needs adjustment.
- Audible features of accessible pedestrian signal needs adjustment.

Category 2 (cont.):

- Speech walk message of accessible pedestrian signal needs adjustment.
- Extended pushbutton feature needs adjustment.

Category 3 (2009 MUTCD Guidance):

- Pushbutton is located more than 10 feet from curb, shoulder, or pavement.
- Pushbutton is farther than five feet from the crosswalk line farthest from the intersection (when applicable).
- Pushbutton height is not within 42 to 48 inches above the ground.
- Pushbutton and arrow are not parallel with the direction of travel.
- Distance between two pushbuttons on the same corner is less than 10 feet.

Category 4:

No deficiencies identified.

Please refer to map addendum document for visualization. Below is the alternative text associated with the map.

Map 7: Pedestrian Crossing Time Barrier Removal Projects

This map illustrates the location of barrier removal projects at pedestrian signals in Lake Oswego, assessed in the S assessed for the ADA self-evaluation and transition plan. ETP. A series of colored dots mark the location of pedestrian signal barriers that are the responsibility of the City of Lake Oswego to remove, ranging from medium priority to high priority, and including pedestrian signals with no deficiencies identified. High priority pedestrian signals are marked with an orange dot, medium priority pedestrian signals are marked with a yellow dot, and pedestrian signals with no deficiencies are marked with a purple dot. For context, streets are marked in solid gray lines, parks are filled in solid light green, water features are filled in solid light blue, and the city limits are marked with a dark green dashed and dotted line. The north arrow points upwards and the scale bar indicates distance by quarter and half mile increments. The map was exported in January 2021.

Please refer to map addendum document for visualization. Below is the alternative text associated with the map.

Please refer to map addendum document for visualization. Below is the alternative text associated with the map.

Map 8: Pedestrian Pushbutton Barrier Removal Projects

This map illustrates the location of barrier removal projects at pedestrian pushbuttons in Lake Oswego, assessed in the SE assessed for the ADA self-evaluation and transition plan. TP. A series of colored dots mark the location of pushbutton barriers that are the responsibility of the City of Lake Oswego to remove, ranging from low priority to high priority, and including pushbuttons with no deficiencies identified. High priority pushbuttons are marked with an orange dot, medium priority pushbuttons are marked with a yellow dot, low priority pushbuttons are marked with a light blue dot, and pushbuttons with no deficiencies are marked with a purple dot. For context, streets are marked in solid gray lines, parks are filled in solid light green, water features are filled in solid light blue, and the city limits are marked with a dark green dashed and dotted line. The north arrow points upwards and the scale bar indicates distance by quarter and half mile increments. The map was exported in January 2021.

Table 26: Pedestrian Signal Barrier Summary

Note on Table 26: This table expands upon Table 24: Pedestrian Signals and Pushbuttons Priority Matrix to further identify the number and percentage of pedestrian signals ranking from high to low in priority, and those with no deficiencies.

Rank	Total Pedestrian Signals	Percent of Total
High	106	75.7%
Medium	5	3.6%
Low	0	0.0%
No Deficiency	29	20.7%
Total	140	100%

Table 27: Pedestrian Pushbutton Barrier Summary

Note on Table 27: This table expands upon Table 24: Pedestrian Signals and Pushbuttons Priority Matrix to further identify the number and percentage of pedestrian pushbuttons ranking from high to low in priority, and those with no deficiencies.

Rank	Total Pedestrian Pushbuttons	Percent of Total
High	189	66.5%
Medium	76	26.8%
Low	1	0.4%
No Deficiency	18	6.3%
Total	284	100%

Table 28: Pedestrian Signals and Pushbuttons Summary of Categories

Note on Table 28: This table expands upon Table 24: Pedestrian Signals and Pushbuttons Priority Matrix to further identify the number and percentage of pushbuttons and pedestrian signals ranking from high to low in priority, and those with no deficiencies. It also includes categories ranked 1 through 4, with 1 being the highest priority, and the priority matrix ranking system ranging from A1 to E5. Additionally, the number of crosswalks with insufficient pedestrian crossing time, issues with MUTCD Standards, and issues with MUTCD Guidance are identified.

Rank	Category	Priority	Total Pushbuttons and Pedestrian Signals	Percent of Total	Pedestrian Crossing Time is Insufficient	Identified Issue with MUTCD Standard	Identified Issue with MUTCD Guidance
High	1	B1	61	14.4%	29	28	4
High	1	C1	234	55.2%	77	133	52
Medium	1	D1	13	3.1%	11	5	0
Medium	1	E1	7	1.7%	4	0	2
Medium	2	B2	17	4.0%	0	17	4
Medium	2	C2	32	7.5%	0	32	7
Medium	3	B3	3	0.7%	0	0	3
Medium	3	C3	9	2.1%	0	0	9

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Low	2	E2	1	0.2%	0	1	0
No Deficiencies	4	B4	12	2.8%	9	0	0
No Deficiencies	4	C4	35	8.3%	9	0	0

Please refer to map addendum document for visualization. Below is the alternative text associated with the map.

Map 9: On-Street Parking

This map illustrates the location of downtown street blocks in Lake Oswego that provide on-street marked or metered parking, assessed for the ADA self-evaluation and transition plan. There are a total of twenty blocks identified within the boundaries of C Avenue to the north, 5th Street to the west, Lake Oswego to the south, and State Street to the east. For context, streets are marked in solid gray lines, parks are filled in solid light green, water features are filled in solid light blue, and the city limits are marked with a dark green dashed and dotted line. The north arrow points upwards and the scale bar indicates distance by quarter and half mile increments. The map was exported in June 2021.

On-Street Parking

The City provides marked and metered parking locations along roadways in downtown Lake Oswego. Metered parking includes time limited parking that is signed. Parking is provided on all or part of 20 block perimeters, with two accessible on-street parking space provided. The accessible parking space provided along the south side of A Avenue between 4th and 5th Streets meets the applicable PROWAG standards for parallel parking spaces. The signage provided does not meet the current OTC standard for Sign No. R7-8. The remaining blocks were evaluated applying PROWAG R214.

PROWAG R214 On-Street Parking Spaces. *Where on-street parking is provided on the block perimeter and the parking is marked or metered, accessible parking spaces complying with R309 shall be provided in accordance with Table R214. Where parking pay stations are provided and the parking is not marked, each 6.1 m (20.0 ft) of block perimeter where parking is permitted shall be counted as one parking space.*

Total Number of Marked or Metered Parking Spaces on the Block Perimeter	Minimum Required Number of Accessible Parking Spaces
1 to 25	1
26 to 50	2
51 to 75	3
76 to 100	4
101 to 150	5
151 to 200	6
201 and over	4 percent of total

Advisory R214 On-Street Parking Spaces. The MUTCD contains provisions for making on-street parking spaces (see section 3B.19). Metered parking includes parking metered by parking stations. Where parking on part of the block perimeter is altered, the minimum number of accessible parking spaces required is based on the total number of marked or metered parking spaces on the block perimeter.

Table 29 on the following page summarizes the observations per R214 by block identified on the map. Per R214, each 20 feet of block perimeter where parking is permitted shall be counted as one parking space. Parking space calculations using this method for each block face were rounded down to the nearest integer.

Table 29: On-Street Parking Summary

Block	Number of Marked Parking Spaces	Number of Unmarked Parking Spaces	Total Parking Spaces Along Block	Number of Accessible Parking Spaces Provided	Number of Accessible Spaces Required by R214
1	0	20	20	0	1
2	0	45	45	0	2
3	43	18	61	0	3
4	23	19	42	0	2
5	30	6	36	0	2
6	25	7	32	0	2
7	0	23	23	0	1
8	0	33	33	0	2
9	0	32	32	0	2
10	19	31	50	0	2
11	0	10	10	0	1
12	5	3	8	0	1
13	0	17	17	1	1
14	0	32	32	1	2
15	0	29	29	0	2
16	10	20	30	0	2
17	6	0	6	0	1
18	0	11	11	0	1
19	0	18	18	0	1
20	0	8	8	0	1

Schedule for Public Right-of-Way Improvements

The transition plan for the right-of-way proposes a strategy for removing barriers through a variety of activities such as new construction, roadway alterations, maintenance, repair projects, and policies that specifically address the removal of ADA barriers. The City can modify or adjust barrier removal priorities to provide flexibility in accommodating community requests, petitions for reasonable modifications from people with disabilities, funding opportunities and constraints, and changes in City programs. The barrier removal strategy incorporates this flexibility and allows the City to respond to new opportunities as they arise.

As part of this planning process, the City developed a GIS inventory of the barriers identified at facilities in the public right-of-way. The resulting inventory is intended to be the living transition plan tracking tool for monitoring the Plan's implementation and tracking the long-term maintenance needs of curb ramps and other facilities within the public right-of-way. The ongoing tracking and monitoring will ensure that the City progresses toward a barrier-free environment in the public right-of-way.

The schedule in this Plan sets a target of 15-years for barrier removal; the City of Lake Oswego, however, reserves the right to modify barrier removal priorities in order to allow flexibility in accommodating community requests, petitions for reasonable modifications from persons with disabilities, changes in city programs, and funding opportunities and constraints. Providing a detailed breakdown of projects past the 15-year timeline is subject to numerous changes over such a time span. It is anticipated that overall compliance could be achieved in 25 to 30 years. For all facilities meeting Criterion A: Location of Citizen ADA Complaint or Request will be evaluated and programmed within one year of the request or complaint.

Curb Ramps

Reference Tables 4 through 11

- Curb ramps identified as high priority will be addressed within the next five years, averaging 65 high priority curb ramps a year.
- Curb ramps identified as D1 and E1 medium priority will be addressed in the next one to 10-years, averaging 40 medium priority curb ramps a year.
- The remaining low and medium priority ramps will be addressed in the next one to 15-years through on-going street maintenance and improvement projects, averaging 70 curb ramps a year.

It is assumed that as curb ramps are evaluated in greater detail, a percentage of ramps will fall within the safe harbor provisions. These “safe harbor” ramps will help reduce the deficient ramp inventory. The City will then revise the curb ramp transition plan schedule for the removal of the remaining barriers, update the curb ramp inventory, and revise the transition plan schedule for the removal of remaining barriers on a regular basis.

Sidewalks

Reference Tables 12 through 19.

- Sidewalks that will be addressed in the next 15-years are as follows:
 - All sidewalks within high priority B1, C1, E1 and B2 sidewalks will be addressed;
 - Category 2 sidewalks meeting Criterion C: Location Serving Transportation will be addressed in the next one to 15 years.
 - The remaining sidewalks in Categories 2, 3, and 4 will be addressed through on-going pavement management and improvement projects.

Crosswalks and Railroad Crossings

Reference Tables 12 through 19; Tables 20 through 23

- Crossings that will be addressed in the next 15-years are as follows:
 - Crossings within high priority B1, C1, and B2 will be reviewed for further design analysis and addressed;
 - Crossings meeting Criterion B: Location Serving Government Offices & Public Facilities and Criterion C: Location Serving Transportation (B2 and C2) will be addressed in the next one to 15 years.
- The remaining crossing in Categories 2, 3, and 4 will be addressed through on-going pavement management and improvement projects.

Pedestrian Crossing Time and Pushbuttons

Reference Tables 24 through 28.

- The pedestrian crossing time barriers identified in this plan will be addressed within one to two-years of the Plan's implementation.
- The barriers identified at pedestrian pushbutton facilities will be replaced in conjunction with associated curb ramp upgrades.
- The City intends to develop an accessible pedestrian signal and replacement policy to ensure that pushbuttons are replaced when the signal controller and software are altered, or the signal head is replaced.

On-Street Parking

Reference Table 29

- The on-street parking barriers identified in this plan will be scheduled to be addressed within one to ten years.

Approach for Barrier Removal in the Right-of-Way

The City plans to address public right-of-way facility barriers through multiple strategies.

- The City will continue to take barrier removal requests and complete upgrades that can be completed within the operations and maintenance budget.
- The City currently has in place a pavement management program that schedules roadway rehabilitation and maintenance over a rolling 3-year schedule. The City plans to review public right-of-way barriers during the implementation of this Plan and address those barriers that can be resolved as part of the ongoing pavement maintenance and rehabilitation program. The City intends to replace or upgrade all non-compliant curb ramps under its maintenance responsibility during roadway alteration projects. The City intends to review crosswalk barriers as a part of roadway reconstruction projects and correct them as feasible.
- The City will continue to provide and work to increase the dedicated budget category for ADA barrier removal in the public right-of-way through its paving and curb ramp projects budget. The current budget provides \$100,000 for curb ramp replacements each year. The funds are used to address barriers that are not being resolved through other mechanisms. Barrier removal addressed by this strategy will be prioritized based on the criteria in this transition plan. It is possible the amount of annual funding may be increased once the transition plan is adopted by City Council. Staff will be requesting increased funding to work towards the proposed plan.
- Barriers will be removed through the City's sidewalk maintenance and repair program. When unsafe sidewalk conditions are reported, the City inspects the location to determine if repairs are needed. City inspectors also look at the rest of the property's public street frontage(s) where the complaint was received. If a sidewalk is found to have barriers, be unsafe, or in disrepair, the property owner is required to repair the sidewalk in accordance with Municipal Code 42.08.410. If the barrier is deemed to be beyond the property owner's maintenance responsibility, then the City will plan for a capital project to address the barrier through the dedicated ADA barrier removal budget category
- The City will explore policies that address ADA barrier removal through property turnover and development policies, and then develop and implement such policies if found feasible. In the meantime, the City will continue to require removal of ADA barriers in the right-of-way as a condition of property development or redevelopment.
- The City will explore policy options that engage property owners in the maintenance of the sidewalks adjacent to their properties.
- The City will actively seek out and applying for grant funding specific to removal of access barriers when available.

- The City will link existing maximum extent feasible (MEF) documentation to the curb ramp inventory and develop a process of recording this MEF documentation with any alterations or new construction.

During the development of this Plan, the City completed various barrier mitigation projects in the public right-of-way.

2020

- WO 271 – Wembley Park Road project included upgraded curb ramps.
- WO 286 – 2020 Pavement Rehabilitation project included upgrade curb ramps associated with repaving at various locations throughout the City.
- LU 15-0046--The Springs Living private development provided upgraded curb ramps and sidewalk facilities.

2021

- WO 272 – Knaus Road Pathway included new and upgraded curb ramps and sidewalk facilities.
- WO 297 – Del Prado Pathway Ramps provided new curb ramps.
- WO 300 – 2021 Pavement Rehabilitation project included upgraded curb ramps associated with repaving at various locations throughout the City.
- WO 313 – 3rd Street Curb Ramps provided upgraded curb ramps.
- LU 17-0051--Iron Light private development provided upgraded curb ramps and sidewalk facilities at 3rd and B.
- WO 260--City Hall development provided upgraded curb ramps and sidewalk facilities.
- LU 18-0026--Mercantile Village private development provided upgraded curb ramps and sidewalk facilities.

The City has planned for the following near-term projects:

2022

- WO 183 – Boones Ferry Road project includes upgraded curb ramps, sidewalks, pedestrian pushbuttons, and crosswalks.
- WO 321 – 2022 Pavement Rehabilitation project included upgrade curb ramps associated with repaving at various locations throughout the City.

4 Barrier Removal Considerations for Plan Implementation

Title II of the ADA requires a public entity to “operate each service, program or activity so that the service, program or activity, when viewed in its entirety, is readily accessible to and usable by individuals with disabilities.” (28 CFR 35.150). This requirement does not:

- Necessarily require a public entity to make each of its existing facilities accessible to and usable by individuals with disabilities;
- Require a public entity to take any action that would threaten or destroy the historic significance of an historic property; or
- Require a public entity to take any action that it can demonstrate would result in a fundamental alteration in the nature of a service, program, or activity or impose undue financial and administrative burdens.

4.1 Triggers for Barrier Removal

The responsibility for ensuring barrier removal will reside with the ADA Coordinator, or designee. This process will be accomplished with two strategies: policy and procedure modifications to remove programmatic barriers to be coordinated by the City’s ADA Coordinator, and maintenance and construction projects to remove structural barriers to be coordinated by the Department heads over the operating areas in which the structural barriers exist. Two conditions determine when barriers must be removed: to provide access to programs, activities, and services, and when a facility is altered.

Program Accessibility

A public entity must ensure that individuals with disabilities are not excluded from services, programs, and activities because existing buildings are inaccessible. A state or local government's programs, when viewed in their entirety, must be readily accessible to and usable by individuals with disabilities. This standard, known as program accessibility (28 CFR 35.151(b)), applies to facilities of a public entity that existed on January 26, 1992. Public entities do not necessarily have to make each of their existing facilities accessible. They may provide program accessibility through a number of methods including alteration of existing facilities, acquisition or construction of additional facilities, relocation of a service or program to an accessible facility, or provision of services at alternate accessible sites.

Facility Alterations

Although structural changes may not be mandated for program accessibility, the City is required to remove physical barriers when it alters a facility. Alterations are defined in the ADA standards as a change in a building or facility that affects or could affect its usability. Many types of projects are considered alterations, including remodeling, renovation, rehabilitation, reconstruction, restoration, resurfacing of circulation paths or vehicular ways, and changes or rearrangement of structural parts, elements, or walls. Normal maintenance, reroofing, painting, or wallpapering, or changes to mechanical and electrical systems are not considered alterations unless they affect a facility's usability. For example, a project limited to an HVAC system would not affect the usability or occupancy of a facility and would not constitute an alteration that would trigger path of travel upgrades.

Where alterations are performed solely for the purpose of barrier removal, they will not trigger additional path of travel improvements (28 CFR 35.151). The ADA standards ensure that the opportunities for accessibility presented by an alteration are taken. How and to what extent the standards apply is determined by the scope of a project and the elements and spaces altered. Only those elements or spaces altered are required to comply, but alterations made to areas containing a primary function (a major activity for which a facility is intended) also require an accessible path of travel.

The City is not required to remove barriers identified within a City-owned facility as part of the Transition Plan:

- Where programmatic modifications can be made to provide an equivalent experience;
- Where there are nearby and available equivalent accessible features;
- Where there are no public programs or activities provided at that portion of the site; or
- When safe harbor conditions are met (28 CFR 35.150(b)(2)(ii)).

It is also possible that an alteration is technically infeasible, in which case compliance is not required. Technical infeasibility refers to "something that has little likelihood of being accomplished because existing structural conditions would require removing or altering a load-bearing member that is an essential part of the structural frame; or because other existing physical or site constraints prohibit modification or addition of elements, spaces, or features that are in full and strict compliance with the minimum requirements." Where technical infeasibility is encountered, compliance is still required to the maximum extent technically feasible. For example, if providing accessibility for people with one type of disability is not feasible, accessibility must still be provided for people with other types of disabilities to the maximum extent feasible.

Public Right-of-Way Alterations and New Construction

In an alteration or new construction project in the public right-of-way, the City must incorporate ADA accessibility standards to the maximum extent feasible (28 CFR 35.151(b)). As part of the Plan's implementation, the City's Public Works Department should document all design exceptions. The ADA title II toolkit incorporates the following guidance about sidewalks and curb ramps:

When pre-ADA streets or sidewalks are altered, space limitations may restrict the ability to install accessible curb ramps. In these cases, the installed curb ramps must comply with the ADA to the maximum extent feasible, but there are still requirements to meet.

In rare instances when it is technically infeasible to install a fully compliant curb ramp during alterations to pre-ADA roadways and walkways because of physical or site constraints, state and local governments must still provide accessibility to the maximum extent feasible. Before reaching a conclusion about technical infeasibility, public entities should consider the extent to which physical or site constraints can be addressed by alternative curb ramp designs. The burden of proving technical infeasibility lies with the state or local government that constructed it.

When highways, streets, and roads are built or altered post-ADA, they must have curb ramps at certain locations: wherever there are curbs or other barriers to entry from a pedestrian walkway or sidewalk, wherever there are curbs or other barriers to entry at any designated pedestrian crosswalks that are located mid-block, wherever sidewalks or walkways intersect with highways, streets, or roads and pedestrians may legally cross the vehicular way, and at public transportation stops.

For pre-ADA highways, streets, roads, and sidewalks that have not been altered, public entities may choose to construct curb ramps at every point where a pedestrian walkway intersects a curb, but they are not necessarily required to do so. Alternative routes to buildings may be acceptable where people with disabilities must travel only a marginally longer route than the general public.

Roadway Alterations and Maintenance

The DOJ, in coordination with the US Department of Transportation, specifies that public agencies are required to provide curb ramps or upgrade curb ramps whenever roadways are altered. An alteration is a change that affects or could affect the usability of all or part of a building or facility (28 CFR 35.151(b)(1)). Alterations of streets, roads, or highways include activities such as reconstruction, rehabilitation, resurfacing, widening, and projects of similar scale and effect (2010 ADA Standards, 106.5). In the July 8, 2013, the “Department of Justice/Department of Transportation Joint Technical Assistance on the Title II of the Americans with Disabilities Act Requirements to Provide Curb Ramps when Streets, Roads, or Highways are Altered through Resurfacing.” Document further articulated maintenance activities on streets, roads, or highways, such as filling potholes, are not alterations and do not trigger barrier removal. The list below distinguishes between roadway alterations versus maintenance activities.

Alteration

- Addition of new layer of asphalt
- Cape seals
- In-place asphalt recycling
- Microsurfacing and thin-lift overlay
- Mill and fill / mill and overlay
- New construction
- Open-graded surface course
- Rehabilitation and reconstruction
- Resurfacing of a crosswalk

Maintenance

- Chip seals
- Crack filling and sealing
- Diamond grinding
- Dowel bar retrofit
- Fog seals
- Joint crack seals
- Joint repairs
- Pavement patching
- Painting or striping
- Scrub sealing
- Slurry seals
- Spot high-friction treatments
- Surface sealing

4.2 Safe Harbor Provisions

The 2010 Standards introduced the concept of *safe harbor*, a new exception that allows facilities built prior to March 15, 2012 and that were in compliance with the 1991 ADA Standards to remain as-is until a public entity plans an alteration to the structural feature. For example, the 1991 Standards allowed 54 inches maximum for a side reach range, while the 2010 Standards lowered the side reach range to 48 inches maximum. Existing items, built prior to March 15, 2012, that are positioned at the 54-inch height, would fall under the safe harbor provision until the time of planned alterations (28 CFR 35.150(b)(2)(i)).

This safe harbor is not a blanket exemption for facilities. If a public entity undertakes an alteration to a primary function area, only the required elements of a path of travel to that area that already comply with the 1991 Standards are subject to the safe harbor. If a public entity undertakes an alteration to a primary function area and the required elements of a path of travel to the altered area do not comply with the 1991 Standards, then the public entity must bring those elements into compliance with the 2010 Standards (28 CFR 35.151(b)(4)(ii)(C)).

This exception applies to elements that might otherwise have to be modified under:

- The program access requirement for public entities;
- The readily achievable barrier removal requirements for places of public accommodation; or
- The path of travel requirement for any alteration that affects the usability of a primary function area in any covered facility.

If a public entity constructed or altered required elements of a path of travel in accordance with the specifications in either the 1991 Standards or the Uniform Federal Accessibility Standards before March 15, 2012, the public entity is not required to retrofit such elements to reflect incremental changes in the 2010 Standards solely because of an alteration to a primary function area served by that path of travel.

The 2010 Standards also identify structural elements that do not fall under the safe harbor provision (28 CFR § 35.150(b)(2)(ii)). The following elements are not eligible for element-by-element safe harbor because technical or scoping specifications for them were not addressed in the 1991 ADA but were added as supplemental requirements prior to 2010.

- Residential facilities dwelling units, sections 233 and 809.
- Amusement rides, sections 234 and 1002; 206.2.9; 216.12.
- Recreational boating facilities, sections 235 and 1003; 206.2.10.
- Exercise machines and equipment, sections 236 and 1004; 206.2.13.
- Fishing piers and platforms, sections 237 and 1005; 206.2.14.
- Golf facilities, sections 238 and 1006; 206.2.15.
- Miniature golf facilities, sections 239 and 1007; 206.2.16.
- Play areas, sections 240 and 1008; 206.2.17.
- Saunas and steam rooms, sections 241 and 612.
- Swimming pools, wading pools, and spas, sections 242 and 1009
- Shooting facilities with firing positions, sections 243 and 1010.
- Miscellaneous:
 - ♦ team or player seating (section 221.2.1.4),
 - ♦ accessible route to bowling lanes (section. 206.2.11),
 - ♦ accessible route in court sports facilities (section 206.2.12).

4.3 Undue Burden

The City is not required to take any action that it can demonstrate would result in a fundamental alteration in the nature of its program or activity, would create a hazardous condition resulting in a direct threat to the participant or others, or would represent an undue financial and administrative burden.

A determination of undue financial or administrative burden can only be made by the head of a department or his or her designee and must be accompanied by a written statement of the reasons for reaching that conclusion. The determination that undue burdens would result must be based on all resources available for use by the City. If an action would result in such an alteration or such burdens, the City must take any other action that would not result in such an alteration or such burdens but would nevertheless ensure that individuals with disabilities receive the benefits and services of the program or activity.

5 ADA Coordinator, Notice Policy, and Grievance Procedure

Title II of the ADA requires a state or local government agency that employs 50 or more people to designate at least one employee, often referred to as the ADA Coordinator, to coordinate the City's efforts to implement the plan and provide the name, office address, and telephone number to staff and the public; give notice of the ADA's requirements, and establish a grievance procedure (28 CFR 35.107 and 28 CFR 35.107).

5.1 ADA Coordinator Roles and Responsibilities

The ADA Coordinator is responsible for organizing and communicating the City's efforts to comply with and fulfill its responsibilities under title II of the ADA, as well as all other applicable state and federal laws. The ADA Coordinator's responsibilities include investigating complaints that the City has engaged in any action prohibited by title II. The City has designated an employee to fulfill these responsibilities and help persons with disabilities receive City services. Working with all departments, the ADA Coordinator can arrange the use of auxiliary aids and services for City meetings, programs and events, or alternate format material for effective communication. Requests for barrier removal or program modifications may be made to the ADA Coordinator, who also investigates and seeks to resolve any complaints regarding accessibility to City facilities or programs. The City will continue to provide the name, office address, and telephone number of its ADA Coordinator to interested persons.

Kelli Byrd
ADA Coordinator
380 A Ave, 2nd Floor
Lake Oswego, OR 97034
Phone: 503.635.0282; TTY: 711
Email: ada@lakeoswego.city

5.2 Notice Under the Americans with Disabilities Act

Title II regulations require the City to inform the public of the rights and protections provided by the ADA for access to public programs, services, and activities. It is the obligation of the head of the public entity to determine the most effective way of providing notice to the public about their rights and the public entity's responsibilities under the ADA. Publishing and publicizing the ADA notice, such as the following, is not a one-time requirement. Public agencies should provide the information on an ongoing basis and update the information whenever necessary. The following is the City of Lake Oswego's current notice under the ADA.

Notice Under the Americans with Disabilities Act

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 (ADA), the City of Lake Oswego will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities.

Employment: The City of Lake Oswego does not discriminate on the basis of disability in its hiring or employment practices and complies with all regulations promulgated by the U.S. Equal Employment Opportunity Commission under Title I of the ADA.

Effective Communication: The City of Lake Oswego will generally, upon request, provide appropriate aids and services leading to effective communication for qualified persons with disabilities so they can participate equally in the City's programs, services, and activities, including qualified sign language interpreters, documents in Braille, and other ways of making information and communications accessible to people who have speech, hearing, or vision impairment.

Modifications to Policies and Procedures: The City of Lake Oswego will make all reasonable modifications to policies and programs to ensure that people with disabilities have an equal opportunity to enjoy all of its programs, services, and activities. For example, individuals with service animals are welcomed in City offices, even where pets are generally prohibited.

Anyone who requires an auxiliary aid or service for effective communication, or a modification of policies or procedures to participate in a City program, service, or activity, should contact the City's ADA Coordinator to submit a request for accommodation no later than four days before the scheduled event.

The ADA does not require the City to take any action that would fundamentally alter the nature of its programs or services, or impose an undue financial or administrative burden.

The City will not place a surcharge on a particular individual with a disability or any group of individuals with disabilities to cover the cost of providing auxiliary aids/services or reasonable modifications of policy, such as retrieving items from locations that are open to the public but are not accessible to persons who use wheelchairs.

Concerns or complaints that a City program, service, or activity is not accessible to persons with disabilities should be directed to the ADA Coordinator at ada@lakeoswego.city or 503-635-0282.

5.3 ADA Complaint/Grievance Procedure

This grievance procedure is established to meet the requirements of the Americans with Disabilities Act (ADA). It may be used by anyone who wishes to file a complaint alleging discrimination on the basis of disability in the provision of services, activities, programs, or benefits by the City of Lake Oswego.

A grievance form can be completed and submitted online, or alternative formats can be requested from the ADA Coordinator.

1. The complaint should be in writing (electronic or hard copy).
2. The complaint should include the following information:
 - a. Name, address, phone number, and email address of the complainant, that is, the person who experienced the alleged discriminatory action on the basis of disability;
 - b. Date of the alleged act of discrimination or the date when the complainant became aware of the alleged discrimination;
 - c. Location at which the discriminatory action occurred;
 - d. Brief but specific description of the discriminatory practice or action and any relevant facts; and
 - e. Remedy or resolution desired.
3. The complaint should be submitted by the complainant and/or designee as soon as possible but no later than sixty (60) calendar days after the alleged discrimination or knowledge of the alleged discrimination to:

Kelli Byrd
ADA Coordinator
City of Lake Oswego
380 A Ave
Mail: PO BOX 369
Lake Oswego, OR 97034
Phone: 503.635.0282; TTY: 711
Email: ada@lakeoswego.city

4. Upon receipt of the complaint, the ADA Coordinator will determine if the complaint information is complete; if additional information is needed; if the City has jurisdiction; and if the complaint is timely.

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5. The ADA Coordinator will notify the complainant in writing within 10 business days to acknowledge receipt of the complaint.
6. The ADA Coordinator will work with the involved department(s) and the complainant to attempt to resolve the complaint. The option of informal meetings may be used at any stage.
7. The ADA Coordinator or designee will provide a response in writing, or in an alternative format if requested, to the complainant within 30 business days after the complaint is received.
8. In instances where the complainant is dissatisfied with the resolution, they may request a reconsideration of the case. The request for reconsideration should be made in writing, or in an alternative format upon request, to the City Manager within 30 business days of receiving the ADA Coordinator's decision.
9. The City Manager or designee will review the complaint, conduct an additional investigation if appropriate, and respond to the complainant in writing, or in an alternative format upon request, within 30 business days after receipt of the request for reconsideration, which shall be the final decision of the City. A copy of the City Manager's response will be forwarded to the ADA Coordinator.
10. The ADA Coordinator will maintain copies of all written ADA complaints, appeals to the City Manager, and responses from these two offices for at least three years.
11. Questions about this policy or its application may be directed to the City's ADA Coordinator office at ada@lakeoswego.city or 503-635-0282; TTY: 711.

6 Definitions

The following is a summary of many definitions found in this document and within the ADA. Please refer to the Americans with Disabilities Act for the full text of definitions and explanations (28 CFR 35.104)

Accessible

A site, building, facility, or portion thereof is deemed accessible when it is approachable and usable by persons with disabilities in compliance with technical standards adopted by the relevant Administrative Authority.

Administrative Authority

A governmental agency that adopts or enforces regulations and guidelines for the design, construction, or alteration of buildings and facilities.

ADA Coordinator

The individual responsible for coordinating the efforts of the government entity to comply with title II and investigating any complaints that the entity has violated title II. Also known as Disability Access Manager or Accessibility Manager.

Alteration in the Public Right-of-Way

A change to an existing facility that affects or could affect pedestrian access, circulation, or use. Alterations include, but are not limited to, resurfacing, rehabilitation, reconstruction, historic restoration, or changes or rearrangement of structural parts or elements of a facility.

Alternative Text

Refers to the text equivalent for an image appearing in an online document. It is read by screen readers in place of the image so that the content and function of the image is accessible to people with visual or certain cognitive disabilities.

Auxiliary Aids and Services

Refers to ways to communicate with people who have communication disabilities such as blindness, vision loss, deafness, hearing loss, a combination of vision and hearing loss or speech or language disorders. The key to deciding what aid or service is needed to communicate effectively with people with disabilities and their companions is to consider the nature, length, complexity, and context of the communication as well as the person's normal method(s) of communication. Auxiliary aids and services include the use of interpreters, notetakers, readers, assistive listening systems, captioning and TTYs or the provision of alternate formats such as braille, ASCII text, large print, recorded audio and electronic formats like CDs and DVDs.

Blended Transition

A raised pedestrian street crossings, depressed corners, or similar connections between the pedestrian access route at the level of the sidewalk and the level of the pedestrian street crossing that have a grade of 5 percent or less.

Clear Ground Space

The minimum unobstructed ground space required to accommodate a single, stationary wheelchair and occupant. Clear ground space provides a location for a wheelchair user to approach and make use of an element.

Complaint

A complaint is a claimed violation of the ADA.

Cross Slope

The grade that is perpendicular to the direction of pedestrian travel. On a sidewalk, cross slope is measured perpendicular to the curb line or edge of the street or highway.

Curb Line

A line at the face of the curb that marks the transition between the curb and the gutter, street, or highway.

Curb Ramp

A ramp that cuts through or is built up to the curb. Curb ramps can be perpendicular or parallel, or a combination of parallel and perpendicular ramps.

Disability 28 CFR.108

The term disability means, with respect to an individual:

- A physical or mental impairment that substantially limits one or more of the major life activities of such individual;
- A record of such impairment; or
- Being regarded as having a disability or such impairment.

Discrimination on the Basis of Disability 28 CFR 35.130

Discrimination on the basis of disability means to:

- Limit, segregate, or classify a citizen in a way that may adversely affect opportunities or status because of the person's disability;
- Limit, segregate, or classify a participant in a program or activity offered to the public in a way that may adversely affect opportunities or status because of the participant's disability;
- Participate in a contract that could subject a qualified citizen with a disability to discrimination;
- Use any standards, criteria, or methods of administration that have the effect of discriminating on the basis of disability;
- Deny equal benefits because of a disability;
- Fail to make reasonable modifications to known physical or mental limitations of an otherwise qualified individual with a disability unless it can be shown that the modification would impose an undue burden on the City's operations;

- Use selection criteria that exclude otherwise qualified people with disabilities from participating in the programs or activities offered to the public; and
- Fail to use tests, including eligibility tests, in a manner that ensures that the test results accurately reflect the qualified applicant's skills or aptitude to participate in a program or activity.

Effective Communication

Communication with people who have vision, hearing, and/or speech disabilities that is equally effective as communication with people without disabilities.

Element

An architectural or mechanical component of a building, facility, space, site, or public right-of-way.

Facility

All or any portion of buildings, structures, improvements, elements, and pedestrian or vehicular routes located in the public right-of-way.

Fundamental Alteration

A modification that is so significant that it alters the essential nature of the goods, services, facilities, privileges, advantages, or accommodations offered. If a public entity can demonstrate that the modification would fundamentally alter the nature of its service, program, or activity, it is not required to make the modification. If a public accommodation (private entity) can demonstrate that a modification would fundamentally alter the nature of the goods, services, facilities, privileges, advantages, or accommodations it provides, it is not required to make the modification.

Grade

The degree of inclination of a surface. Refer to Slope definition. In public right-of-way, grade is the slope parallel to the direction of pedestrian travel.

Grade Break

The line where two surface planes with different grades meet.

Having a Record of Impairment

An individual is disabled if he or she has a history of having an impairment that substantially limits the performance of a major life activity; or has been diagnosed, correctly or incorrectly, as having such impairment.

International Symbol of Accessibility (ISA)

The ISA is recognized worldwide as a symbol identifying accessible elements and spaces. Standards issued under the ADA and ABA Standards reference and reproduce the ISA to ensure consistency in the designation of accessible elements and spaces. Uniform iconography promotes legibility, especially for people with low vision or cognitive disabilities.

Maintenance

Routine or periodic repair of all pedestrian facilities to restore them to the standards to which they were originally designed and built. Maintenance does not change the original purpose, intent, or design of public sidewalks, shared-use paths, curb ramps, crosswalks, pedestrian islands, or other public walkways.

Operable Part

A component of an element used to insert or withdraw objects, or to activate, deactivate, or adjust the element. The technical requirements for operable parts apply to operable parts on accessible pedestrian signals and pedestrian pushbuttons and parking meters and parking pay stations that serve accessible parking spaces.

Other Power-Driven Mobility Device (OPDMD)

Any mobility device powered by batteries, fuel, or other engines that is used by individuals with mobility disabilities for locomotion and designed to operate in areas without defined pedestrian routes.

Path of Travel

A path of travel is a continuous, unobstructed way of pedestrian passage by means of which a newly constructed or altered area may be approached, entered, and exited and which connects an area with an exterior approach (including sidewalks, streets, and parking areas), an entrance to the facility and other parts of a facility. An accessible path of travel may consist of walks and sidewalks, curb ramps and other interior or exterior pedestrian ramps; clear floor paths through lobbies, corridors, rooms, and other improved areas; parking access aisles; elevators and lifts; or a combination of these elements. Within the context of alterations, path of travel also includes restrooms, telephones and drinking fountains serving the altered area.

Pedestrian Access Route

A continuous and unobstructed path of travel provided for pedestrians with disabilities within or coinciding with a pedestrian circulation path in the public right-of-way.

Pedestrian Circulation Path

A prepared exterior or interior surface provided for pedestrian travel in the public right-of-way

Physical or Mental Impairments

Any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more body systems, such as: neurological, musculoskeletal, special sense organs, respiratory (including speech organs), cardiovascular, reproductive, digestive, genitourinary, immune, circulatory, hemic, lymphatic, skin, and endocrine; or any mental or psychological disorder such as intellectual disability, organic brain syndrome, emotional or mental illness, and specific learning disability (28 CFR 35.108(b)(1)).

Primary Function

Is a major activity for which the facility is intended. Areas that contain a primary function include, but are not limited to, the dining area of a cafeteria, the meeting rooms in a conference center, as well as offices and other work areas in which the activities of the public entity using the facility are carried out (28 CFR 35.151(b)(4)(i)).

Program Accessibility

A public entity's services, programs, or activities, when viewed in their entirety, must be readily accessible to and usable by individuals with disabilities.

Public Entity

Any state or local government; any department, agency, special-purpose district, or other instrumentality of a state or local government.

Public Right-of-Way

Public land or property, usually in interconnected corridors, that is acquired for or dedicated to transportation purposes.

Qualified Historic Facility

A facility that is listed in or eligible for listing in the National Register of Historic Places or designated as historic under an appropriate state or local law.

Qualified Individual with a Disability

A qualified individual with a disability means an individual with a disability who, with or without reasonable modification to rules, policies, or practices; the removal of architectural, communication, or transportation barriers; or the provision of auxiliary aids and services, meets the essential eligibility requirements for the receipt of services or the participation in programs or activities provided by the City.

Reasonable Modification.

A public entity must modify its policies, practice, or procedures to avoid discrimination unless the modification would fundamentally alter the nature of its service, program, or activity (28 CFR 35.130).

Regarded as Having a Disability

An individual is disabled if she or he is treated or perceived as having an impairment that substantially limits major life activities, although no such impairment exists.

Running Slope

The grade that is parallel to the direction of pedestrian travel.

Scoping

Requirements that specify what features are required to be accessible and, where multiple features of the same type are provided, how many of the features are required to be accessible.

Service Animal

Service animals are dogs (and in certain circumstances, miniature horses) that are individually trained to perform tasks for people with disabilities. Examples of such work or tasks include guiding people who are blind, alerting people who are deaf, pulling a wheelchair, alerting, and protecting a person who is having a seizure, reminding a person with mental illness to take prescribed medications, calming a person with Post-Traumatic Stress Disorder (PTSD) during an anxiety attack, or performing other duties. Service animals are working animals, not pets. The work or task a dog has been trained to provide must be directly related to the person's disability. Dogs whose sole function is to provide comfort or emotional support do not qualify as service animals under the ADA. Guidance on the use of the term service animal in the 2010 Standards has been published online at the ADA website: [ADA.gov](https://www.ada.gov). Title II regulations now include assessment factors to assist public entities in determining whether miniature horses can be accommodated as service animals in their facilities:

- Whether the miniature horse is housebroken;
- Whether the miniature horse is under the owner's control;
- Whether the facility can accommodate the miniature horse's type, size, and weight; and
- Whether the miniature horse's presence will not compromise legitimate safety requirements necessary for safe operation of the facility.

Slope

Ground surface that forms a natural or artificial incline. Slope is typically conveyed as either a percentage or a ratio that represent the change in elevation between two points of an incline divided by the horizontal distance between the two points.

- Cross Slope: The slope that is perpendicular to the direction of travel.
- Running Slope: The slope that is parallel to the direction of travel.

Substantial Limitations of Major Life Activities

An individual is disabled if she or he has a physical or mental impairment that (a) renders her or him unable to perform a major life activity, or (b) substantially limits the condition, manner, or duration under which she or he can perform a particular major life activity in comparison to other people. Major life activities are functions such as caring for oneself, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working. In determining whether physical or mental impairment substantially limits the condition, manner, or duration under which an individual can perform a particular major life activity in comparison to other people, the following factors shall be considered:

- The nature and severity of the impairment;
- The duration or expected duration of the impairment; and
- The permanent or long-term impact (or expected impact) of or resulting from the impairment.

Technical Standards

Specify the design criteria for accessible features, including the specific numbers, conditions, and measurements that are required.

Technically Infeasible

With respect to an alteration of a building or a facility, something that has little likelihood of being accomplished because existing structural conditions would require removing or altering a load-bearing member that is an essential part of the structural frame; or because other existing physical or site constraints prohibit modification or addition of elements, spaces or features that are in full and strict compliance with the minimum requirements.

Telecommunications Display Device (TDD)

A telecommunications display device for the deaf (TDD) is an electronic device for text communication via a telephone line, used when one or more of the parties has hearing or speech difficulties. Other names for TDD include TTY.

Telecommunications Relay Service (TRS) or 711

The free, nationwide telecommunications relay service, reached by calling 711, uses communications assistants who serve as intermediaries between people who have hearing or speech disabilities who use a text telephone (TTY) or text messaging and people who use standard voice telephones. The communications assistant tells the telephone user what the other party is typing and types to tell the other party what the telephone user is saying. TRS also provides speech-to-speech transliteration for callers who have speech disabilities.

Text Telephone (TTY)

Teletypewriters or text telephones have a keyboard and a visual display for exchanging written messages over the telephone. The ADA established a free, nationwide relay network to handle voice-to-TTY and TTY-to-voice calls, which is reached by calling 711. TTY is a more general term for teletypes but is often referred to as TDD.

Vertical Surface Discontinuities

Vertical differences in level between two adjacent surfaces.

Video Relay Service (VRS)

Video relay service (VRS) is a free, subscriber-based service for people who use sign language and have videophones, smart phones, or computers with video communication capabilities. For outgoing calls, the subscriber contacts the VRS interpreter, who places the call and serves as an intermediary between the subscriber and a person who uses a standard voice telephone. The interpreter tells the telephone user what the subscriber is signing and signs to the subscriber what the telephone user is saying.

Wheeled Mobility Device

A manually operated or power-driven device designed primarily for use by an individual with a mobility disability for the main purpose of indoor or of both indoor and outdoor locomotion. Also referred to as a manual wheelchair, a power wheelchair, or an electric scooter.

7 Resources

7.1 Federal, State, and Local Laws, Standards, and Ordinances

Americans with Disabilities Act (ADA) title II Regulations

Nondiscrimination on the Basis of Disability in State and Local Government Services.

<https://www.ecfr.gov/current/title-28/chapter-I/part-35>

U.S. Department of Justice Civil Rights Division, Disability Rights Section

U.S. Department of Justice Civil Rights Division, Disability Rights Section provides many free ADA materials including the Americans with Disability Act (ADA) text. Printed materials may be ordered by calling the ADA Information Line [(800) 514-0301 (Voice) or (800) 514-0383 (TTY)]. Publications are available in standard print as well as large print, audiotape, braille, and computer disk for people with disabilities. Documents, including the following publications, can also be downloaded from the Department of Justice website.

<http://www.ada.gov/>

- Title II Technical Assistance Manual (1993) and Yearly Supplements.
<http://www.ada.gov/taman2.html>
- Accessibility of State and Local Government Websites to People with Disabilities. 2003.
<https://www.ada.gov/websites2.htm>
- ADA Best Practices Tool Kit for State and Local Governments. 2008.
<https://www.ada.gov/pcatoolkit/abouttoolkit.htm>
- ADA Guide for Small Towns. 2000.
<http://www.ada.gov/smtown.htm>
- The ADA and City Governments: Common Problems. 2000.
<http://www.ada.gov/comprob.htm>
- ADA Requirements: Effective Communication. 2014.
<https://www.ada.gov/effective-comm.htm>
- ADA Requirements: Service Animals. 2010.
https://www.ada.gov/service_animals_2010.htm
- ADA Information for Law Enforcement. 2008.
<http://www.ada.gov/policeinfo.htm>
- Commonly Asked Questions About the ADA and Law Enforcement. 2006.
http://www.ada.gov/q&a_law.htm
- Communicating with People Who are Deaf or Hard of Hearing: ADA Guide for Law Enforcement Officers. 2006.
<http://www.ada.gov/lawenfcomm.htm>
- Model Policy for Law Enforcement on Communicating with People Who are Deaf or Hard of Hearing. 2006.
<http://www.ada.gov/lawenfmodpolicy.htm>
- Questions and Answers: The ADA and Hiring Police Officers. 1997.
<http://www.ada.gov/copsq7a.htm>

- ADA Requirements: Wheelchairs, Mobility Aids and Other Power-Driven Mobility Devices. 2014.
<https://www.ada.gov/opdmd.htm>
- An ADA Guide for Local Governments: Making Community Emergency Preparedness and Response Programs Accessible to People with Disabilities. 2008.
<https://www.ada.gov/emergencyprepguide.htm>
- Access for 9-1-1 and Telephone Emergency Services. 1998.
<http://www.ada.gov/911ta.htm>
- The Americans with Disabilities Act and Other Federal Laws Protecting the Rights of Voters with Disabilities. 2014.
https://www.ada.gov/ada_voting/ada_voting_ta.htm
- ADA Checklist for Polling Places. 2016.
<https://www.ada.gov/votingchecklist.htm#toc1>

U.S. Access Board

The Access Board is an independent federal agency that promotes equality for people with disabilities through leadership in accessible design and the development of accessibility guidelines and standards. Created in 1973 to ensure access to federally funded facilities, the Board is now a leading source of information on accessible design. The Board develops and maintains design criteria for the built environment, transit vehicles, information and communication technology, and medical diagnostic equipment under the Americans with Disabilities Act of 1990 (ADA) and other laws. It also provides technical assistance and training on these requirements and on accessible design, and continues to enforce accessibility standards that apply to federally funded facilities under the Architectural Barriers Act of 1968 (ABA). <https://www.access-board.gov/>

State of Oregon

The State of Oregon Department of Consumer and Business Services, Building Codes Division establishes the standards for construction through the Oregon Structural Specialty Code adopted pursuant to OAR chapter 918, division 8. As of the writing of this document, the State provisions for accessibility standards are the 2019 Oregon Specialty Structural Code, Chapter 11, and incorporated by reference the ICC/ANSI A117.1-2009 Accessible and Usable Buildings and Facilities, and the Oregon Transportation Commission Standards for Accessible Parking Places August 2018. Because building codes are updated every few years, the City should regularly review changes and update policies and procedures related to accessibility to ensure compliance with current code. <https://www.oregon.gov/bcd/codes-stand/pages/index.aspx>

7.2 Local and National Organizations Supporting People with Disabilities

Access Recreation

Access Recreation is a Portland, Oregon ad hoc committee that developed guidelines for minimum information that should be provided about hiking trails and outdoor facilities to benefit hikers with disabilities, and which can be applied to websites, printed materials, and at trail sites. The committee is made up of representatives from federal, state, and local park agencies and organizations that support people with disabilities.

[http://accessrecreation.org/home/Access Recreation Home.html](http://accessrecreation.org/home/Access_Recreation_Home.html)

Adaptive Sports Northwest

Adaptive Sports Northwest provides adaptive sports and recreation opportunities to those in Oregon and southwest Washington, and seeks to tap the potential of possibility in each participant. The organization has partnerships with the United States Paralympic Committee, Wheelchair & Ambulatory Sports USA, and Disabled Sports USA.

<http://www.adaptivesportsnw.org/>

Aging and Disability Resource Connection of Oregon (ADRC)

ADRC is a statewide resource providing information about local public and privately paid services to address aging or disability needs. The organization's trained professional staff can help with immediate needs or planning for the future.

<https://adrcforegon.org>

The Arc

The Arc (formerly Association for Retarded Citizens of the United States) is the country's largest voluntary organization committed to the welfare of all children and adults with mental retardation and their families.

<http://www.thearc.org>

American Association of People with Disabilities

The American Association of People with Disabilities is the largest nonprofit, nonpartisan, cross-disability organization in the United States.

<http://www.aapd.com/>

American Foundation for the Blind (AFB)

AFB is committed to improving accessibility in all aspects of life—from cell phones to ATMs, on web sites, and in workplaces. Services include assistance in making products and services accessible to people with visual impairments. AFB offers expert consulting services and accessible media production. AFB provides objective product evaluations of adaptive technologies through its assistive technology product database.

<http://www.afb.org/>

Autism Research and Resources of Oregon

Located in Milwaukie, the Autism Research & Resources of Oregon (ARROAutism) is a not-for-profit organization assisting with Autism research projects in Oregon. The group develops resources to meet unmet needs for families and individuals with Autism in Oregon and assists families and individuals with Autism to locate already existing resources that meet their needs.

<https://arroautism.org/>

Autism Society of Oregon

This affiliate of the Autism Society, the nation's leading grassroots autism organization, exists to improve the lives of all affected by autism by increasing public awareness about the day-to-day issues faced by people on the spectrum, advocating for appropriate services for individuals across the lifespan, and providing the latest information regarding treatment, education, research, and advocacy.

<http://autismsocietyoregon.org/>

Center on Technology and Disability

Funded by the U.S. Department of Education's Office of Special Education Programs, the Center on Technology and Disability provides a wide range of resources on assistive technology, from introductory fact sheets and training materials to in-depth discussion of best practices and emerging research.

<http://www.ctdinstitute.org/>

Disability Arts and Culture Project

The mission of Disability Art and Culture Project (DACP) is to further the artistic expression of people with both apparent and non-apparent disabilities. DACP accomplishes this mission by supporting the creative expression of people with disabilities, utilizing the performing arts as a method of examining disability in relation to society. DACP also supports established and emerging artists, as well as the community at large, in developing knowledge and expression of disability culture and pride.

<http://dacp.art/>

Disability Emergency Management Advisory Council (DEMAC)

The Disability Emergency Management Advisory Council (DEMAC) of Oregon is a group that will help ensure Oregon is prepared to meet the needs of people with disabilities in disasters. The DEMAC was created to apply the experiences and knowledge of people with disabilities, as subject matter experts, to guide statewide emergency management in the development and implementation of inclusive practices through all planning, response, and recovery activities.

<https://www.oregon.gov/dhs/EmergencyManagement/Pages/DEMAC.aspx>

Disability Resources, Inc. (DRI)

DRI is a national nonprofit organization that provides information about resources for independent living. DRI maintains an on-line directory of assistive technology resources.

<http://www.disabilityresources.org/>

Down Syndrome Network Oregon (DSNO)

Based in Lake Oswego, DSNO is a leading faith-based local resource for Down Syndrome support and offers a range of community-based programs to build an outstanding support organization for families, friends and individuals with Down syndrome. The values guiding its mission are advocacy, inclusiveness, equality and respect for life, compassion, comfort, and hope.

<https://dsno.org/>

Independent Living Resources

Independent Living Resources (ILR) is a non-profit organization dedicated to helping people with all disabilities. The agency provides services such as advocacy, information and referral, orientation and mobility, peer counseling, recreation, and skills training.

<https://www.ilr.org/>

Institute for Human Centered Design

The Institute (formerly known as Adaptive Environments) is a non-profit organization committed to advancing the role of design in expanding opportunity and enhancing experience for people of all ages and abilities. The organization provides education and consultation to public and private entities about strategies, precedents and best practices that go beyond legal requirements for human centered design for places, things, communication and policy that integrate solutions with the reality of human diversity.

<http://humancentereddesign.org/>

International Dyslexia Association (IDA) Oregon Branch

The International Dyslexia Association (IDA) Oregon Branch is a volunteer non-profit organization that serves Oregon and some southwest Washington counties. Their mission is to raise awareness and understanding of dyslexia, to promote effective intervention strategies, and to support individuals with dyslexia, their families, and professionals in our community.

<https://or.dyslexiaida.org/>

Mt. Hood Kiwanis Camp

Mt. Hood Kiwanis Camp (MHKC) helps empower children and adults with disabilities through equitable access to the outdoors and recreation. They partner with the U.S. Forest Service to offer outdoor recreational programming for campers with developmental, intellectual, and physical disabilities at an accessible campsite in the Mt. Hood National Forest; MHKC's office is located in southwest Portland.

<https://mhkc.org/>

National Association of the Deaf (NAD)

NAD is a national consumer organization representing people who are deaf and hard of hearing. NAD provides information about standards for American Sign Language Interpreters and the Captioned Media Program on its website.

<http://www.nad.org/>

National Center on Accessibility (NCA)

NCA is a cooperative venture between Indiana University and the National Park Service, and a leading authority on access issues unique to park and recreation programs and facilities. The organization believes that universal design and inclusion are important factors for achieving personal wellness and building healthy communities. NCA provides research, technical assistance, and education to facilitate recreation opportunities for people of all abilities.

<http://www.ncaonline.org>

National Council on Disability (NCD)

NCD is an independent federal agency charged with advising the President, Congress, and other federal agencies regarding policies, programs, practices, and procedures that affect people with disabilities.

<https://ncd.gov/>

National Federation of the Blind (NFB)

NFB is a national organization advocating on behalf of persons who are blind or have low vision. NFB provides on-line resources for technology for the blind, including a technology resource list, a computer resource list, screen access technology, sources of large print software for computers, and sources of closed-circuit TV (CCTV).

<http://www.nfb.org/>

National Organization on Disability

National Organization on Disability promotes the full and equal participation and contribution of America's 54 million men, women and children with disabilities in all aspects of life. NOD maintains an on-line directory of information and links including transportation-related resources.

<http://www.nod.org/>

Northwest ADA Center

The ADA National Network Centers are a national platform of ADA professionals and experts charged with assisting businesses, state and local governments, and people with disabilities as they manage the process of changing our culture to be user friendly to disability and the effect the variety of health conditions can have on society. The Northwest ADA Center is a part of the Department of Rehabilitation Medicine at the University of Washington, and collaborates with the Center for Technology and Disability Studies, a program within the Center for Human Development and Disability and the Department of Rehabilitation Medicine.

<http://nwadacenter.org/>

On-the-Move Community Integration

On-the-Move is a nonprofit organization supporting adults with intellectual and developmental disabilities in accessing their community. They offer activities for adults with intellectual and developmental disabilities around the Portland area with a focus on getting out in the community doing things that are healthy, social, sustainable, and fun.

<https://onthemovepdx.org/>

Oregon Association of the Deaf (OAD)

The Oregon Association for the Deaf mission focuses on realizing the value of mutual assistance and co-operation in matters essential to Oregon Deaf and Hard of Hearing citizens in general welfare and to promote, protect, and preserve the civil rights and advocate to enhance the quality of life for Deaf and Hard of Hearing individuals.

<https://oad1921.org/>

Oregon Commission for the Blind

The Oregon Commission for the Blind was established in 1937 as a state agency to provide services to Oregon's citizens who experience vision loss and need specialized training and support to live full and productive lives. The agency receives policy direction and oversight from a seven member Commission representing consumer organizations, education, ophthalmology/optometry, business and individual citizens.

<https://www.oregon.gov/blind/Pages/index.aspx>

Oregon Council on Developmental Disabilities

OCDD partners with Oregonians with developmental disabilities and their families. Its mission is to advance social and policy change so that people with developmental disabilities, their families and communities may live, work, play, and learn together. Special programs include the Inclusive Child Care Project, Advocacy in Action, Community Partnerships, and the Clarion Newspaper.

<https://www.ocdd.org/>

Oregon Deaf and Hard of Hearing Services (ODHHS)

Oregon Deaf and Hard of Hearing Services (ODHHS) is a resource for all Oregonians, to improve quality of life for Deaf and Hard of Hearing people and their families. ODHHS works to make state services and programs welcoming and accessible to Deaf and hard of hearing Oregonians and their families.

<https://www.oregon.gov/DHS/SENIORS-DISABILITIES/SPPD/Pages/ODHHS.aspx>

Oregon Disabilities Commission (ODC)

Initially formed in 1983 and re-formed in 2005, ODC is a governor-appointed commission housed in the Department of Human Services. The commission is composed of 15 members broadly representative of major public and private agencies that are experienced in or have demonstrated particular interest in the needs of individuals with disabilities.

<http://www.oregon.gov/DHS/SENIORS-DISABILITIES/ADVISORY/ODC/Pages/index.aspx>

Oregon Self Advocacy Coalition (OSAC)

OSAC advocates for the equal rights of people with disabilities, fighting for self-determination and full inclusion in society. Its programs help further the advancement of people with disabilities, with the goal of impacting legislation affecting people with disabilities.

<https://www.askosac.org/>

Oregon Spinal Cord Injury Connection (local chapter of the United Spinal Association)

United Spinal Association is a membership organization serving individuals with spinal cord injuries or disease. Formerly known as the Eastern Paralyzed Veterans Association, the organization expanded its mission to serve people with spinal cord injuries or disease regardless of their age, gender or veteran status. Information on accessibility training and consulting services and recreational opportunities for people with spinal cord injuries or disease is available on their website.

<http://www.unitedspinal.org>

Oregon Technology Access Program (OTAP)

OTAP provides training, information, technical assistance, and resources regarding the uses of technology for children with disabilities. Services are available to anyone concerned with the needs of Oregon's children with disabilities from birth to age 21. The program is sponsored by the Oregon Department of Education.

https://douglassesd.k12.or.us/oregon-technology-access-program-otap/?fbclid=IwAR3ZPoJW60E1QqJ3j4H3rrFdPyeTjbFfbMUt_zMkwtZjYrbsEFN_R-ajzRk

Paralyzed Veterans of America (PVA)

PVA is a national advocacy organization representing veterans. PVA's Sports and Recreation Program promotes a range of activities for people with disabilities, with special emphasis on activities that enhance lifetime health and fitness. PVA's website provides information on useful sports publications and a list of contacts.

<http://www.pva.org>

Special Olympics Oregon

Special Olympics Oregon uses sports training and competition to grow acceptance and inclusion of children and adults with intellectual disabilities. The group provides year-round sports training and athletic competition in a variety of Olympic-type sports for children and adults.

<https://soor.org/>

State Independent Living Council (SILC)

SILC is a federally mandated, governor-appointed body, designed to ensure that people with disabilities have a major role in designing Oregon's Independent Living program services. The Independent Living Services Program is a nonresidential, consumer-directed model of peer support, information and referral, skills training, and advocacy for people with disabilities.

<http://www.oregon.gov/DHS/SENIORS-DISABILITIES/SILC/pages/index.aspx>

TVW Inc.

TVW helps people with disabilities prepare for, find, attain, and maintain employment to become more self-sufficient and independent. The organization operates a work-place readiness training program that includes vocational training, communication skills in the workplace, interviewing, attire, appropriate language, and more. Career development services include discovery, vocational assessments, job development, and job coaching.

<https://www.tvwinc.org/>

United Cerebral Palsy Association (UCP)

UCP's mission is to advance the independence, productivity and full citizenship of people with cerebral palsy and other disabilities, through a commitment to the principles of independence, inclusion, and self-determination.

<http://www.ucp.org>

United Spinal Association

United Spinal Association is a membership organization serving individuals with spinal cord injuries or disease. Formerly known as the Eastern Paralyzed Veterans Association, the organization expanded its mission to serve people with spinal cord injuries or disease regardless of their age, gender or veteran status. Information on accessibility training and consulting services and recreational opportunities for people with spinal cord injuries or disease is available on their website.

<http://www.unitedspinal.org>

Washington County Disability, Aging, and Veteran Services (DAVS)

This division of the Department of Health and Human Services provides programs and services to maintain and enhance the quality of life for Washington County seniors, veterans, and people with disabilities. DAVS offers support for family caregivers, assists with Medicare, connects individuals with limited income and resources to key benefits, and provides short-term intervention to help isolated seniors navigate and access services, among other programs.

<https://www.co.washington.or.us/hhs/davs/>

World Institute on Disability

WID is an international public policy center dedicated to carrying out research on disability issues. WID maintains an online information and resource directory on technology, research, universal design, and ADA.

<http://www.wid.org/resources/>

7.3 Guidance Documents and Articles—Web Design

National Center for Accessible Media (NCAM)

NCAM is a research and development facility dedicated to addressing barriers to media and emerging technologies for people with disabilities in their homes, schools, workplaces, and communities. NCAM is part of the Media Access Group at Boston public broadcaster WGBH, which includes two production units, The Caption Center and Descriptive Video Service® (DVS®). Tools and guidelines for creating accessible digital media can be found on the NCAM website.

<https://www.wgbh.org/foundation/ncam/guidelines/accessible-digital-media-guidelines>

Utah State University, Center for Persons with Disabilities, WebAIM

WebAIM (Web Accessibility in Mind) is a non-profit organization based at the Center for Persons with Disabilities at Utah State University that has provided comprehensive web accessibility solutions since 1999. Documents and training materials, including the following publications, can be downloaded from the WebAIM website.

<http://www.webaim.org/>

Web Accessibility Initiative (WAI)

WAI develops guidelines widely regarded as the international standard for Web accessibility, support materials to help understand and implement Web accessibility, and resources, through international collaboration. The Web Content Accessibility Guidelines (WCAG) was developed with a goal of providing a single shared standard for web content accessibility that meets the needs of individuals, organizations, and governments internationally. Documents and training materials, including the following publications, can be downloaded from the WAI website.

<https://www.w3.org/WAI/>

7.4 Guidance Documents and Articles—Signage

APH Tactile Graphic Image Library

American Printing House for the Blind, Inc. (APH). The website requires registration for access, and it is free. <http://www.aph.org/tgil/>

Designing for People with Partial Sight and Color Deficiencies

Arditi, Aries. Effective Color Contrast: 2005.

https://pages.mtu.edu/~nilufer/classes/cs3611/interesting-stuff/designing-with-colors-1/color_contrast.htm

Signage and the 2010 ADA Standards

Luminant Design LLC. v2.1. 2011. <http://www.luminantdesign.com/ada.html>

Signage Requirements in the 2010 Standards for Accessible Design

Society for Experiential Graphic Design (SEGD).

https://segd.org/sites/default/files/SEGD_2012_ADA_White_Paper_Update.pdf

U.S. Department of the Interior, National Park Service – Harpers Ferry Center Accessibility Committee

Harpers Ferry Center (HFC) serves as the Interpretive Design Center for the National Park Service. HFC works to ensure that the highest level of accessibility that is reasonable is incorporated into all aspects of interpretive media, planning, design, and construction. This includes ensuring that all new interpretive media are provided in such a way as to be accessible to and usable by all persons with a disability. It also means all existing practices and procedures are evaluated to determine the degree to which they are currently accessible to all visitors, and modifications are made to assure conformance with applicable laws and regulations. The HFC website includes accessibility resources, guidelines and updates, Department of the Interior Section 504, photographs of best practices, and more.

<http://www.nps.gov/hfc/accessibility/>

7.5 Guidance Documents and Articles—Creating Accessible Documents

Adobe Software

- Creating Accessible Adobe PDF Files.
<https://helpx.adobe.com/acrobat/using/creating-accessible-pdfs.html>
- Create and verify PDF accessibility (Acrobat Pro).
<https://helpx.adobe.com/acrobat/using/create-verify-pdf-accessibility.html>
- Accessibility by product.
<https://www.adobe.com/accessibility/products.html>

American Council of the Blind (ACB)

Best Practices and Guidelines for Large Print Documents used by the Low Vision Community. 2011. <http://acb.org/large-print-guidelines>

Braille Authority of North America and the Canadian Braille Authority

Guidelines and Standards for Tactile Graphics (Web Version). 2012.
<http://www.brailleauthority.org/tg/web-manual/tgmanual.html>

GSA Government-wide Section 508 Accessibility Program

Create Accessible Electronic Documents (a compilation of federal guidance, checklists, and testing information for creating and maintaining accessible documents in various popular electronic formats, including Word, PDF, Excel, and PowerPoint).
<https://www.section508.gov/create/>

Smithsonian Institution

Smithsonian Guidelines for Accessible Publication Design. 2001.
<https://www.si.edu/Content/Accessibility/Publication-Guidelines.pdf>

Social Security Administration, Accessibility Resource Center (SSA-ARC)

SSA Guide: Producing Accessible Word and PDF Documents, Version 2.1. 2010.
https://www.ssa.gov/accessibility/files/The_Social_Security_Administration_Accessible_Document_Authoring_Guide_2.1.2.pdf

A Guide to Making Documents Accessible to People Who Are Blind or Visually Impaired. 2002.

<http://www.sabeusa.org/wp-content/uploads/2014/02/A-Guide-to-Making-Documents-Accessible-to-People-Who-are-Blind-or-Visually-Impaired.pdf>

University of Washington

Creating Accessible Documents. <https://www.washington.edu/accessibility/documents/>

7.6 Training Resources

ADA National Network

<https://adata.org/ada-training>

Great Lakes ADA Center

<http://www.adagreatlakes.org/ProgramsAndServices/Trainings/>

Northwest ADA Center

<http://nwadacenter.org/training>

United States Access Board

<https://www.access-board.gov/training>

Southeast ADA Center

<http://adasoutheast.org/training/courses.php>

ADA Coordinator Training Certificate Program

<https://www.adacoordinator.org/default.aspx>