



Created
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Updated
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ADA TRANSITION PLAN

CITY OF
GRESHAM

1333 NW Eastman
Parkway

Gresham, OR 97030



ADA TRANSITION PLAN

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Department of Finance and Management Services

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and Parks & Recreation

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1. INTRODUCTION AND OVERVIEW

1.1. Transition Plan Overview

Title II of the Americans with Disabilities Act (ADA) provides that “no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity.” The City of Gresham is a “public entity” within the meaning of the Act.

Pursuant to the implementation regulations of the ADA, a public entity must develop an ADA Transition Plan that addresses how it will bring existing services, programs and activities into compliance with the Act. Specifically, 28 CFR 150(d)(3) states:

“The plan shall, at a minimum—

- (i) Identify physical obstacles in the public entity's facilities that limit the accessibility of its programs or activities to individuals with disabilities;
- (ii) Describe in detail the methods that will be used to make the facilities accessible;
- (iii) Specify the schedule for taking the steps necessary to achieve compliance with this section and, if the time period of the transition plan is longer than one year, identify steps that will be taken during each year of the transition period; and
- (iv) Indicate the official responsible for implementation of the plan.”

This document serves as the City of Gresham’s ADA Transition Plan in compliance with these requirements. Specifically, this plan:

- identifies physical obstacles (or processes to inventory such obstacles) to existing City buildings, parks, and right of way facilities that limit accessibility by individuals with disabilities;
- identifies policies and practices that limit accessibility of existing City programs, activities, and services to persons with disabilities;
- identifies policies and practices that ensure applicants, participants, and members of the public with disabilities have communication access that is as equally effective as that provided to persons without disabilities;
- describes the methods the City of Gresham will use to make existing City facilities, programs, activities and services accessible;
- provides a schedule for making these modifications; and
- indicates the official(s) responsible for implementation of the Plan.

The Transition Plan contains a plan to remove barriers identified in the self-evaluations performed to date, and a schedule for completing self-evaluations that remain to be done. The Transition Plan is not a static document and the City will continue to make and implement updates over time as new evaluations are completed and barriers are identified and removed. An updated version of the Transition Plan will be posted on the City's webpage at <https://greshamoregon.gov/titleii>.

1.2. Background of the City of Gresham

The City of Gresham is in Multnomah County, Oregon, located just minutes from iconic Mount Hood, Multnomah Falls and the Columbia River Gorge National Scenic Area, the city of Portland, and Portland International Airport. Gresham is Oregon's fourth largest city and the Portland metropolitan area's second largest. The population as of July 1, 2019 was 111,810 per the Portland State University Population Research Center with a median age of 36.6 according to the U.S. Census Bureau's 2018 American Community Survey. The land mass of the city encompasses 23.4 square miles.

Gresham elected its first Mayor and City Council in 1904 and was officially incorporated as a city in 1905. The City of Gresham operates under a council-manager form of government. The City Council, which consists of the Mayor and six councilors, is elected to be the legislative and policy-making body for the city. The City Council appoints a City Manager, who serves as the administrative head of the government for the City. Gresham is served by three independent school districts along with several private schools. Mount Hood Community College is also located within the city limits.

Gresham is accessed from the west via Interstate 84 and U. S. Route 26 from the east. Mass transit serving the community include TriMet's bus system and the MAX Light Rail Blue Line. Portland's Amtrak station lies 15 miles west of Gresham and offers multiple daily departures.

2. ADA PROGRAM INFORMATION

The following sections discuss provisions made to comply with the administrative responsibilities of Title II of the ADA as well as to achieve accessible facilities and programs.

2.1. ADA Program Responsibilities and Coordination

The regulations implementing the ADA and Section 504 of the Rehabilitation Act require any public entity with fifty or more employees to designate at least one employee to coordinate ADA/504 compliance (28 CFR §35.107(a)). Federal regulations require public entities to make available to interested persons the name, office address and telephone number of the ADA coordinator (28 CFR §35.107(a)). In addition, Section 35.106 requires a public entity to disseminate sufficient information to applicants, participants, beneficiaries and other interested persons to inform them of the rights and protections afforded by the ADA/504. Furthermore, in providing for notice, a public entity must comply with the requirements for effective communication in Section 35.160.

The City of Gresham's general ADA Coordinator, Transportation ADA Coordinator and Parks ADA Coordinator have the official responsibility for implementing this Transition Plan. The general ADA Coordinator, Transportation ADA Coordinator and Parks ADA Coordinator are responsible for coordinating the efforts of the City of Gresham to comply with Title II of the ADA and to investigate any complaints alleging violation of Title II or potential discriminatory practices for persons with disabilities.

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| Facilities ADA / Title II Coordinator |
| Rebecca Brooks |
| Administrative Services Manager |
| Email: Rebecca.Brooks@GreshamOregon.gov |
| Phone: 503-618-2792 |
| Areas of Responsibility: City buildings, City-led public meetings, and City services and programs outside of the public right-of-way |
| Transportation ADA / Title II Coordinator |
| Kate Dreyfus |
| Associate Transportation Planner |

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|---|
| Email: Kate.Dreyfus@GreshamOregon.gov |
| Phone: 503-618-2294 |
| Areas of Responsibility: Public right-of-way, including City-led public meetings related to transportation projects |
| Parks ADA / Title II Coordinator |
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| Areas of responsibility: All City Parks and Parks-owned properties |

3. LEGAL REQUIREMENTS, POLICIES, PRIORITIES AND FUNDING

3.1. Federal Requirements

Title II of the Americans with Disabilities Act protects qualified individuals with disabilities from discrimination on the basis of disability in the services, programs, or activities of all state and local governments. All facilities designed, constructed, or altered by, on behalf of, or for the use of a public entity must be readily accessible and usable by individuals with disabilities, if the construction or alteration is begun after January 26, 1992.

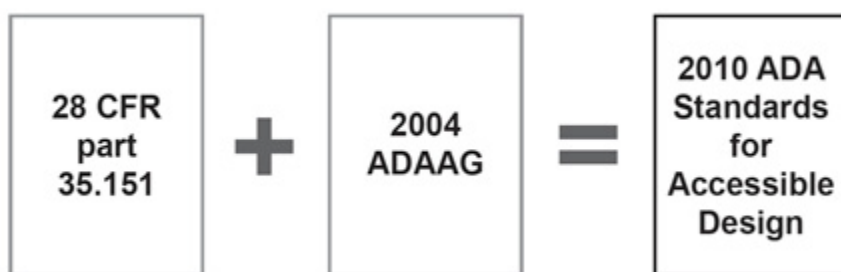
3.1.1. Existing Facilities

Numerous existing facilities, both within and outside the right-of-way, were constructed prior to the enactment of current ADA design standards. Per Federal regulations, the City must develop a plan to bring these facilities into compliance with ADA design standards. As noted above, the regulations found in 28 CFR 35.150(d)(3) require the City to adopt and implement an ADA Transition Plan that will bring City facilities, programs, and services into compliance with current ADA standards.

3.1.2. New Facility Construction and Alteration of Existing Facilities

Guidelines for Non-Public Right-Of-Way Facilities (for example, Public Access Buildings, Parks, Programs and Services)

The 2010 ADA Standards for Accessible Design apply to all facilities except public transportation facilities, which are subject to U.S. Department of Transportation (DOT)'s ADA Standards. State and local government facilities must follow the requirements of the 2010 Standards, including the Title II regulations at 28 CFR 35.151 and the 2004 Americans with Disabilities Act Accessibility Guidelines (ADAAG) at 36 CFR part 1191, Appendices B and D. In the few places where requirements between the two differ, the requirements of 28 CFR 35.151 prevail.



Guidelines for Public Right-of-Way Facilities (for example, Curb Ramps and Traffic Signals)

The Public Right-of-Way Accessibility Guide (PROWAG), issued in August 2023, is the current guidance on how to apply the DOT's ADA Standards to the public right-of-way. PROWAG is accepted by FHWA as "best practice" and the City of Gresham follows PROWAG for all alterations and new construction in the public rights-of-way.

28 CFR 35.151 also applies to new construction and alteration of public right-of-way facilities. The U.S. Department of Justice (DOJ) and DOT issued joint technical assistance on Title II of the ADA, which provides guidance on the requirements to provide curb ramps when streets, roads, or highways are altered through resurfacing, within the context of 28 CFR 35.151¹.

3.2. State Requirements

Oregon Revised Statutes (ORS) Chapter 447 outlines requirements related to architectural barriers, curb ramps, and parking requirements. ORS 447.241 provides high-level guidance for how architectural barriers should be removed when existing buildings are renovated, altered or modified. ORS 447.241 requires every building renovation, alteration or modification to areas containing a primary function to include path of travel upgrades serving the area with a cost and scoping requirement of no more than 25 percent of the cost of the alteration. Priority is to

¹ <https://www.ada.gov/doj-fhwa-ta.htm>, Accessed January 8, 2020.

be given to accessible parking and entrances, an accessible route to the area being altered, accessible restrooms, drinking fountains, and additional elements such as storage and alarms. The curb ramp requirements, outlined in ORS 447.310, apply to curbs constructed on any city street, whether its construction is funded using state or Federal funds. The parking requirements presented in ORS 447.233 are included in the state building code and apply to off-street parking areas.

Oregon has adopted the 2012 International Building Code (IBC) in the form of a model code.

The Oregon Department of Transportation (ODOT) issues technical bulletins from time to time that address guidance and requirements for curb ramps, sidewalks, pedestrian signals, and other transportation facilities in the right-of-way.

3.3. City Requirements

The City of Gresham Public Works Standards provide a consistent policy under which certain aspects of public facility design shall be implemented. Chapter 6.05 of the Public Works Standards outlines requirements related to curb ramps, sidewalks, and other ADA accessibility features. New and altered construction of public facilities by private development must meet the standards set forth in Section 6.05.02.

4. IDENTIFICATION OF BARRIERS

The City of Gresham uses a self-evaluation process to proactively identify and assess physical obstacles, or barriers, that affect the accessibility of City programs and services to persons with disabilities. The self-evaluation process involves City staff or agents performing inspections to create an inventory of data documenting the barriers that exist at City facilities. City staff also receives and documents reports of barriers submitted by community members.

4.1. Self-Evaluation

The City of Gresham has inspected and inventoried, or is in the process of inspecting and inventorying, City facilities to identify structural barriers that limit or preclude full participation at its facilities and in its programs and services. This includes identification of barriers to accessibility to City-owned and operated buildings and facilities open for public use, City parks, including sports fields and shelters, and accessibility on City managed streets, sidewalks and shared use paths.

Section 6 contains the schedule to complete inventories and bring any ADA barriers into ADA compliance.

4.1.1. Public Access Buildings

In 2018, the City of Gresham's Facilities Division retained a consultant to inspect and inventory the two public access buildings that are most visited by the public: City Hall (1333 NW Eastman Parkway) and the Public Safety Building (1331 NW Eastman Parkway). The inventory looked at the following areas in and around the building and identified barriers to ADA accessibility that exist:

- Parking
- Accessible path of travel, approach and entrance
- Access interior routes and spaces
- Public restrooms
- Assembly areas
- Meeting rooms
- Emergency exits, notifications, visible signals and alarms
- Signage
- Drinking fountains
- Service counters
- Public telephones
- Doors

Between 2018 and 2024, the Facilities Division made significant progress in retrofitting or improving areas in these buildings and other City-owned facilities to bring them more fully into ADA compliance. Examples of these projects include:

- Sidewalk repaving at City Hall near the loading dock to remove trip hazards
- Sidewalk repaving in front of the Police/Fire entrance to remove trip hazards
- Sidewalk repaving in front of Council Chambers to remove trip hazards
- Improvements to the entry of Council Chambers for easier access
- Modifying two restrooms at City Hall to gender-neutral facilities
- Ramp improvements at the Facilities shop
- Installation of powered desks in Utility Billing to allow variable height accessibility
- Improved, easier-to-read signage at various locations with Braille translations
- Drinking fountains throughout City facilities modified to meet ADA height requirements
- Purchase of hearing assistance devices for meeting rooms
- Improved emergency evacuation notification systems

Additional public access buildings will be inspected and inventoried according to the schedule in Section 6.

4.1.2. Parks

The City of Gresham's Parks Division manages 32 parks, 25 of which are developed. For the first phase of this Transition Plan, the City inspected and inventoried Main City Park to identify if any barriers to accessibility exist. The inventory looked at the following categories:

- Parking
- Buildings
- Public restrooms
- Play areas
- Sports fields
- Shelters

In each category, the following items were evaluated:

- Accessible path of travel, approach and entrance
- Circulation pathways
- Doors
- Interior access
- Signage
- Service counters and concession area
- Seating
- Drinking fountain

During the City's Parks System Plan update in 2024-2025, an Americans with Disabilities Act

(ADA) Facility Assessment was conducted for selected park facilities to support the City in fulfilling the requirements of federal civil rights legislation and its accessibility core value of providing an equitable and enjoyable visitor experience for people with disabilities.

Detailed accessibility surveys were conducted on seven park facilities, and physical barriers were identified at those locations. These assessments supplement previous assessments conducted for other individual facilities and sites. The seven sites were selected based on a number of evaluation criteria, such as prevalence of underserved population, presence of known ADA deficiencies, park type, and results of previous facility visits. These assessments were done in conjunction with the City’s 2024 updated ADA Transition Plan.

The seven facilities included in the assessment were:

- Bella Vista Park
- Hall Park
- Nadaka Park
- North Gresham Park
- Pat Pfeifer Park
- Red Sunset Park
- Rockwood Central Park

The assessments at these parks were limited to areas where community members engage in City programs, activities, and services within the park boundaries. Sidewalks, ramps, street parking, and other elements within the public right-of-way were not included.

Barriers are related to the following five categories listed in order of importance:

1. **Navigation.** Barriers to physically entering the facilities should be removed as a first priority.
2. **Participation.** Barriers to using the facility for its primary intended purpose – in this case, enjoyment of the facilities’ outdoor recreation features – fall under the second priority.
3. **Comfort.** Barriers to use of restrooms, drinking fountains, and similar amenities should be a third priority for removal.
4. **Other elements.** Barriers to other elements may not be essential to use of the facility, but nonetheless affect a visitor’s experience of inclusion. This category may be used for duplicate features not required for use of the site, or for which programmatic solutions are preferred.
5. **Opportunities.** Recommendations for universal design features outside the scope of required standards, that would improve the user experience.

The table below summarizes the ADA barrier counts by category within each of the seven park facilities. Navigation barriers (category 1) were the most prevalent with 106 cited barriers, followed by Comfort (category 3) with 86, Participation (category 2) with 59 times, and Opportunities (category 5) with 4 recommendations to improve user experience. Other Elements (category 4) were not noted for any of the assessed sites.

ADA Barrier Counts By Category

| Facility Name | Category 1 | Category 2 | Category 3 | Category 4 | Category 5 |
|-----------------------|------------|------------|------------|------------|------------|
| Bella Vista Park | 15 | 8 | 8 | - | 1 |
| Hall Park | - | 3 | 6 | - | - |
| Nadaka Nature Park | 2 | 2 | 20 | - | 3 |
| North Gresham Park | 2 | 6 | 11 | - | - |
| Pat Pfeifer Park | 23 | 18 | 12 | - | - |
| Red Sunset Park | 43 | 12 | 16 | - | - |
| Rockwood Central Park | 21 | 10 | 8 | - | - |
| Subtotals | 106 | 59 | 81 | 0 | 4 |

The City of Gresham Parks Division strives to provide an equitable and inclusive park system that meets the diverse needs of the community with an emphasis on its three core values: Accessibility, Equity, and Safety. The City's ADA Transition Plan along with the ADA Facility Assessment Report conducted during the Park System Plan update, collectively highlight the City's investment in putting its core values into practice. The ADA Facility Assessment Report uncovered a variety of needs that the City must address to comply with the law and to also provide a more enjoyable experience for community members.

The need to address ADA and accessibility concerns was also mentioned across the Park System Plan community engagement activities and was the second highest need identified in the Online Questionnaire administered in 2024. While the Parks Division alone may not be able to address all of the needs like improving sidewalks on road facilities managed by other departments, it can make improvements by creating pathways within parks and making sure park entrances and features within parks are accessible.

Suggested approaches to address needs include the following:

- Regrading surfaces
- Sign installations
- Reduction or elimination of openings
- Adjustments to door kick plates
- Modifying operating mechanisms
- Increasing or providing clear floor areas
- Providing accessible routes

4.1.3. Curb Ramps

In 2016, the City of Gresham staff completed an initial inventory of curb ramps within the City of Gresham. Every intersection included multiple street corners and each street corner was evaluated. Data were collected to determine whether a ramp existed and if so, whether it had

curb ramps with truncated domes or no truncated domes. These conditions were then categorized as substantially compliant, partially compliant, or deficient, as follows:

- Substantially Compliant: Has PROWAG-compliant truncated domes and substantially meets ADA guidelines (ramp should be usable by most, if not all, people with disabilities).
- Partially Compliant: Has curb ramps without truncated domes and therefore meets some but not all ADA guidelines.
- Deficient: Lacks curb ramps and therefore is not ADA accessible

Since 2017, the City's process has been to record and store all relevant data for newly constructed or reconstructed ramps to demonstrate their full compliance with ADA standards.

Curb ramps were categorized by area, per 28 CFR 35.150(d), based on their proximity to government services, transportation facilities, and other places of public accommodation. Area 1 is the highest priority area to address curb ramp issues, Area 2 is the second highest priority, and Area 3 is the lowest priority. Areas are established as follows:

- Area 1: Government funded / supported and public service facilities that are open to the public
 - A. City of Gresham facilities
 - B. Multnomah County facilities
 - C. State of Oregon facilities
 - D. Federal facilities
 - E. Metro facilities
 - F. TriMet bus stops and MAX stops
 - G. Schools: Public and private, including college
- Area 2: Places of public accommodation and employment
 - A. Stores, rental establishments, service establishments
 - B. Hotels/motels
 - C. Recreation, leisure, and entertainment venues
- Area 3: Facilities that do not fall into the above priorities.

Ramps are considered appurtenant to the facilities above if they are within a 300' distance of points/buildings, within 100' of a linear facility (bus routes or public shared use paths), or within 500' of a MAX stop.

The following table provides an inventory of curb ramps in the right-of-way by area (as defined earlier), and their level of compliance with ADA standards. The percentages listed represent the portion of ramps within an area that have been field verified as compliant, are substantially compliant, partially compliant, or deficient.

| | Area 1 | Area 2 | Area 3 | Total |
|-------------------------------|---------------------|-------------------|---------------------|---------------------|
| Field Verified as Compliant | 312 (12%) | 61 (8%) | 674 (14%) | 1,047 (13%) |
| Substantially Compliant Ramps | 987 (37%) | 192 (24%) | 914 (19%) | 2,093 (26%) |
| Partially Compliant Ramps | 939 (35%) | 375 (47%) | 1,282 (27%) | 2,596 (32%) |
| Deficient Ramps / Ramp Areas | 442 (16%) | 174 (22%) | 1,831 (39%) | 2,447 (30%) |
| Total | 2,680 (100%) | 802 (100%) | 4,701 (100%) | 8,183 (100%) |

On a complaint basis or as resources permit, the City will continue to inspect and inventory the substantially compliant and partially compliant curb ramps surveyed in 2016 to evaluate the running and cross slope of curb ramps, the width and length of curb ramps, the landings, and the conditions of the adjoining crosswalk to identify accessibility barriers which would help prioritize curb ramp improvements.

4.1.4. Traffic Signals

The City of Gresham provides traffic signals at numerous street intersections that control pedestrian traffic as well as vehicular traffic. These signals can be barriers to pedestrians (1) who are unable to see the 'WALK' or 'DON'T WALK' indications on the pedestrian signal head, (2) who need to activate a pushbutton while using a mobility device, and / or (3) who need additional time to traverse the crosswalk.

The first barrier can be addressed by using accessible pedestrian signals with integrated pushbuttons. Accessible pedestrian signals and detectors provide information in non-visual formats (such as audible tones, speech messages, and/or vibrating surfaces) to assist pedestrians who are blind or have low vision².

The second barrier relates to the placement of a pedestrian pushbutton relative to curb ramps, turning spaces and sidewalk. While an intersection may have an accessible pushbutton, other parts of the pedestrian area may have one or more barriers to accessibility.

² To be responsive to early requests while a more robust standard had not been developed, the City added its own audible tone system to pedestrian signals when requested by pedestrians who are blind or have low vision. These have been done on an as-requested basis in close cooperation with the affected individual(s) in order to ensure that the solution improves the community member's mobility and does not introduce problems for vehicular or pedestrian safety. With recent improvements in accessible pedestrian signal technology, the City will gradually migrate its existing systems toward the standard.

The third barrier allows consideration for adequate crossing time. Providing crossing time that accommodates a pedestrian travel speed of 3.5 feet per second is considered adequate. All City traffic signals have pedestrian clearance ('DON'T WALK') times that meet or exceed this 3.5 feet per second standard.

Two key documents define design standards related to accessible pedestrian signals and pedestrian pushbuttons: PROWAG and the Manual on Uniform Traffic Control Devices (MUTCD). While MUTCD does not require accessible pedestrian signals as a standard, the City of Gresham wants to ensure that accessible pedestrian signals are part of the infrastructure that is used to serve pedestrians at signalized intersections.

Currently, the City of Gresham has 102 traffic signals with pedestrian traffic signals and has completed a detailed inventory of pedestrian-related features at these traffic signals. The inventory has collected the following information for each individual crosswalk approach:

- Are truncated domes present?
- Is there an unobstructed and level concrete surface adjacent to the pushbutton?
- Is there a 48" wide accessible route from the pushbutton through the ramp?
- Does it have a vibrotactile pushbutton, or another type?
- Is the pedestrian push button height between 42" to 48"?
- Is the pedestrian push button reach less than 10"?
- Is there at least 10 feet of separation between pedestrian push buttons? If not, do the push buttons have the standard accessibility features called out in MUTCD Section 4K.02?
- Is the face of the pedestrian push button perpendicular to the crosswalk?
- Does the pedestrian push button have a locator tone?
- Is there an audible tone or message for the pedestrian 'WALK' signal?
- What is the pedestrian push button distance from the curb?
- Is the pedestrian push button 5' or less from the far side crosswalk line?

To determine if the City's crosswalk approaches substantially comply with the ADA, the inventory data has been consolidated to answer the first three of these questions about each of the 656 surveyed crosswalk approaches:

1. Are there truncated domes present?
2. Is there a 4' by 4' unobstructed concrete level landing and turning surface adjacent to the pushbutton?
3. Is there a 48"-wide accessible route from the pushbutton through to the bottom of the ramp?

The collected inventory data shows that of the 656 approaches:

- 405 can answer "yes" to all three of these questions

- 148 can answer “yes” to two of these questions
- 67 can answer “yes” to just one of these questions, and
- 26 cannot answer “yes” to any of these questions.

Additionally, the City of Gresham has 28 crosswalks enhanced with flashers. All of these flashers are operated by pedestrian push buttons.

The City has been working to increase the number of accessible crossings at its traffic signals. The collected inventory data shows that the City has 95 crossings at signals that are equipped with:

- fully-accessible pedestrian push buttons
- locator tones
- audible word messages like “Wait” and “Walk sign is on to cross Burnside Road” and
- vibro-tactile push buttons

The City also has 98 crossings with the City’s legacy audible tone walk signals. The pedestrian push buttons at these crossings do not provide verbal messages or vibrotactile feedback. A speaker installed in the pedestrian signal head emits a steady or staggered tone when the ‘WALK’ signal is illuminated.

4.1.5. Sidewalks

While the City is not required to furnish new sidewalks to comply with ADA, sidewalks are a key part of the City’s transportation infrastructure. Persons with disabilities are better able to participate in City programs, services, and activities and reach their desired destination if the public rights-of-way are accessible. As stated in its 2014 Transportation System Plan, the City of Gresham is “committed to providing pedestrian facilities that ensure safety and convenience of all users.” The primary component of these pedestrian facilities is a network of sidewalks located almost exclusively within the public right-of-way.

There are two primary ways in which the sidewalk system might not comply with the goals of an accessible transportation network. First, there may be portions of right-of-way where no sidewalk exists. These are often referred to as “missing links.” Second, there may be areas where sidewalk does exist, but it does not comply with ADA in one or more areas, such as inadequate width, presence of fixed obstacles (such as utility poles or mailboxes), temporary barriers, improper cross-slope, or unevenness in the terrain.

Missing Links

The Public Works Standards include ADA-compliant requirements when new sidewalk is constructed; however, many parts of the City were developed before these standards were adopted and either lack sidewalks or lack enough right-of-way to accommodate sidewalk.

The City maintains an inventory of streets with adjacent sidewalks and streets without adjacent sidewalks in the City of Gresham. There are approximately 250 miles of streets with adjacent sidewalk on at least one side of the street; there are 65 miles of roadway without any adjacent sidewalks. Completion of missing links is not a requirement for ADA compliance, but will be pursued over time as it does promote greater accessibility and mobility for the community as a whole.

When constructing new facilities or performing major alterations to existing facilities, the City will prioritize accessible sidewalk connectivity to surrounding sites and facilities. In some cases where right-of-way is limited, many communities like Gresham are exploring alternative pedestrian routes like shared facilities, if an engineering evaluation deems it would be appropriate. Such shared facilities would be designed to safely accommodate pedestrians on lower traffic streets through designs that may involve innovative pavement markings and narrowing the drivable portion of the street.

Other Barriers to Sidewalk Accessibility

Other factors may create barriers to sidewalk accessibility, including stationary obstacles that reduce the clear width, settling or heaving of sidewalk sections, and construction and other temporary circumstances. These situations often evolve over time, and as such a point-in-time inventory is inadequate for assessing these types of barriers. The City's general approach in dealing with these barriers is as follows:

Construction and Temporary Circumstances

Many public and private projects affect the accessibility of the sidewalk system, typically for a short period of time. As part of the City's traffic control plan requirements, a temporary pedestrian accessible route must be maintained throughout the construction period.

Maintenance and Upkeep

Sidewalk accessibility can be impacted by poorly maintained surfaces, overgrown vegetation, and defects such as heaves, lifts, and cracks. Overhanging vegetation and sidewalk defects are ever-changing and are the responsibility of the adjacent property owner. Community members may submit reports of these accessibility issues to the City's code compliance program to address with the adjacent property owner. If the property owner does not repair or remove the barrier, the City may abate the overhanging vegetation or sidewalk defect and charge the property owner for the costs to make the repair. When the City performs maintenance or alteration on its sidewalks, it will remedy any of these issues that exist and bring its sidewalks into ADA compliance.

Stationary Obstacles

Sidewalk accessibility may also be impacted by obstructions such as utility poles, mailboxes, or other encroachments in the right-of-way. The cost of removing these obstacles can be substantial; consequently, the City will seek to relocate or remove these obstructions or provide alternate access when substantial public or private sector work is being done that includes work on that sidewalk.

4.1.6. Shared-Use Paths

A shared-use path serves as part of a transportation circulation system and supports multiple recreation opportunities, such as walking, bicycling, and inline skating. A shared-use path typically has a surface that is asphalt, concrete, or firmly packed crushed aggregate, and is physically separated from motor vehicular traffic with an open space or barrier. Requirements for shared-use paths are addressed through PROWAG. Key requirements that relate specifically to shared-use paths include the following:

- The full width of a shared-use path must comply with PROWAG for grade, cross slope, and surface of pedestrian access routes
- Compliance with grade provisions is to be met to the extent practicable where physical constraints or regulatory constraints prevent full compliance
- Objects are prohibited from overhanging or protruding into any portion of shared-use path at or below 8' measured from the finished surface
- Curb ramps and blended transitions are to be equal to the width of the shared-use path

The City of Gresham, through the Parks Division, maintains its shared-use paths to ensure that vegetation has not encroached into the paths at or below 8' measured from the finished surface. Gresham currently has three continuous shared-use paths: Gresham Fairview Trail, Wy'East Way, and Springwater Corridor. Sections of additional paths are being constructed over time as adjacent land develops.

In 2018, the City of Gresham retained a consultant to inspect and inventory a portion of the Springwater Trail from SW Walters Drive to SE Regner Road. This inventory focused on the presence of shared-use paths and includes width, grade, cross slope, and ramps.

4.1.7. Programs and Services

The City of Gresham offers programs, activities and services to residents and visitors of the City of Gresham. The City of Gresham continues to review its policies and practices to ensure that persons with disabilities are not excluded or limited from participation in City programs, activities and services. This ongoing evaluation is performed by staff and incorporates input from community members and visitors to the City. When policies or practices are identified that might limit or exclude persons with disabilities, the City identifies modifications that must

be made to those policies and practices and implements those modifications in a timely manner.

The City has implemented the following policies and procedures to assist community members and visitors with disabilities access the City's programs, services and activities.

Reasonable Accommodations

The City provides the opportunity to request a reasonable accommodation to participate in a City program, activity, or service via submitting a form on the City website (<https://greshamoregon.gov/titleii>). Alternate means of requesting an accommodation by email, phone, or in writing are also available. Members of the public may also submit reports of barriers or impediments to the City by completing an online form.

City Council and Other Public Meetings

With a minimum of five days' advance notice, the City offers amplified sound devices, video sign language interpreters, and in-person sign language interpreters at meetings with staff or public meetings to assist people with impaired hearing or speech. All public meeting locations are wheelchair accessible with an accessible path of travel, accessible restrooms, accessible parking, accessible signage, and an accessible route from transit stops to the meeting location. When virtual (either using remote or distributed locations) meetings take place, the meeting agenda lists how a community member may request an accommodation to participate.

Though not required for ADA accessibility, City Council meetings are broadcast live and played back the week of the meeting and the following week³. The City provides access to upcoming meetings, agendas and minutes online.

ADA Entrance Locations

A list of City buildings with ADA entrance locations and additional building circulation information can be found on the City website at <https://greshamoregon.gov/titleii> under "More Information," at the "City facilities and ADA access" link.

Effective Communication

Persons with disabilities may contact the respective ADA Coordinator to request that written materials such as meeting notices, agendas, and public information documents are available in alternate formats upon request. The City offers communication tools, such as TDD or equally effective telecommunication systems to communicate with individuals with impaired hearing or speech by phone. Requests for large-print documents and accommodations are made available by contacting the City by phone. A TTY number is published on City agendas.

³ Broadcast and recording capabilities may differ based on meeting location, particularly for virtual meetings.

Auxiliary Aids and Services

The City accepts requests for hearing assistance and American Sign Language (ASL) interpretation services. These requests can be submitted by phone, by emailing the ADA Coordinator, or through the City website at <https://greshamoregon.gov/titleii> under “Request for Help”. In addition, agendas often contain contact information for staff who can help to secure accommodations for a particular meeting. Requests for ASL interpretation and hearing impaired communication devices are addressed if the City is notified at least five days in advance.

Nondiscrimination Notice

The City has published a Nondiscrimination Notice on its website and at the reception area of City Hall, the Public Safety Facility, and the Rockwood Public Safety Facility and in contracts used to purchase City goods. The notice lists the ADA Coordinator and states the City will not place a surcharge on persons 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 public but are not accessible to persons who use wheelchairs.

Emergency Evacuation Procedures

The City has a Risk Management and Safety Manual which outlines procedures for evacuating City facilities during a variety of emergency scenarios. The procedures provide methods for all people to be safely evacuated from the facility, regardless of disability.

The City utilizes various methods of emergency communications to keep residents informed and safe. These methods include updates on the City’s website, email notifications of public alerts, social media, Gresham Emergency Radio and additional radio alert stations, road signs, and direct contact with residents. The City activates its Emergency Operation Center during a large emergency or disaster to coordinate its response.

Training

City staff participates in periodic training regarding the requirements of the ADA for facilities, public rights-of-way and outdoor recreation standards.

Employment Opportunities

City of Gresham employment opportunities are posted online. Both the main Jobs Page on Gresham’s Website (<https://greshamoregon.gov/Human-Resources/>) and individual Job Bulletins have language announcing how to request an accommodation during the application or selection process.

Service Animals

The City has procedures to allow service animals in City facilities during City meetings and public meetings.

4.2. Community Member Requests or Grievance Procedure

4.2.1. General Community Member Requests

Input from the public is another critical means to identify barriers for people with disabilities. The City of Gresham encourages people who have questions, comments, concerns or requests related to accessibility, such as installation of curb ramps where missing, to contact the pertinent department or to submit a formal request that will allow the City of Gresham to respond or correct the issue. A web form that supports submission of requests to the City can be found on the City website at <https://greshamoregon.gov/titleii> under “Request Help,” at the “Request ADA access or report a barrier” link.

4.2.2. Community Member Requests to Remove Barriers at Pedestrian Crossings

Community members may notify the City that a particular signalized location presents difficulties for pedestrians who have disabilities to cross the roadway. If the City receives such a request, an engineering study will be conducted in accordance with MUTCD Section 4K.01, that considers the needs of pedestrians in general, as well as the information needs of pedestrians with disabilities. The engineering study will consider the following factors:

- A. Potential demand for accessible pedestrian signals;
- B. A request for accessible pedestrian signals;
- C. Traffic volumes during times when pedestrians might be present, including periods of low traffic volumes or high turn-on-red volumes;
- D. The complexity of traffic signal phasing (such as split phases, protected turn phases, leading pedestrian intervals, and exclusive pedestrian phases); and
- E. The complexity of intersection geometry.

4.2.3. Grievance / Complaint

Users of City of Gresham facilities and services also have the right to file a grievance if they believe that City of Gresham has not provided reasonable access to City of Gresham-managed buildings and pedestrian facilities. The Grievance Procedure, found on the City of Gresham website <http://greshamoregon.gov/titleii> under “File a Complaint,” provides details on how to file a complaint.

4.3. Public Input

The City solicited public input about accessibility needs through a web-based survey in September and October 2024, with notification through social media, the GRESHAM newsletter, Community Connections (e-newsletter) and Around the Table (e-newsletter). The findings of this survey were incorporated into the Transition Plan, and are summarized in Appendix A.

5. METHODS TO REMOVE BARRIERS

The City of Gresham employs a range of methods to remove identified barriers to accessibility along City streets, in public access building and parks, and in its programs, for persons with disabilities. Below are the methods and avenues for barriers to be removed at City of Gresham facilities and public access buildings, and as identified in its programs and services.

- *Capital Improvement Projects.* The Capital Improvement Program (CIP) is a five-year investment plan that identifies major projects requiring the expenditure of public funds over and above routine annual operating expenses. The CIP incorporates identified barrier removal projects in planned and scheduled projects.
- *Street alteration projects.* These are projects in which pedestrian facilities are incidental or a secondary objective to the project, such as pavement rehabilitation or modifications to a traffic signal. Pursuant to 28 CFR 35.151(b), when a public entity undertakes an alteration project, it must make accessible any pedestrian facilities changed within the scope of the project, to the maximum extent feasible.⁴ Alteration projects typically are funded by operating funds (primarily gas tax revenues), grant funds or system development charges (SDCs).
- *Private land development projects.* These are projects which require a property owner to make improvements to street frontage adjacent to their property, including construction or modification of sidewalk and/or curb ramps. Newly constructed sidewalks and driveways must be built to ADA standards. Adjacent land development projects typically are funded by private funds.
- *Code enforcement actions.* Sidewalk improvements may be required in response to code violations identified through community member complaints. Per city code, adjacent property owners are responsible for repairing defects in sidewalks. When a sidewalk defect affects an area where there should be an ADA-compliant curb ramp, the City may contribute to the cost of the truncated domes that are required for ramp compliance.

⁴ Alteration projects are distinct from maintenance projects, which do not require such accessibility work.

- *Community members' requests for barrier removal.* Community members may identify barriers in City facilities, parks, or public access buildings and request the barrier be removed. Barriers will be removed based on their priority according to this Transition Plan.
- *Stand-alone projects.* These projects focus primarily on pedestrian facility improvements, including repair or retrofit of ADA ramps. These projects may be initiated by City staff or at a community member's request and are generally funded by operating funds or grant funds.

6. SCHEDULE FOR ADDITIONAL INVENTORY AND IMPLEMENTATION

Recognizing the City of Gresham has limited funding resources and cannot immediately correct all accessibility deficiencies, the City of Gresham has developed schedules for completing inventories (when required) and addressing all identified deficiencies. The City of Gresham reserves the right to update its barrier removal priorities to allow for flexibility in accommodating changes in programs, community requests, and petitions for reasonable modifications from persons with disabilities.

If no starting year for a schedule is provided, then the start date shall be assumed to be the adoption date of this plan.

6.1. Public Access Buildings

The timeline for completing inventories and removing identified barriers at buildings accessed by the public is below⁵.

| Facility Name | Address | Timeline to Complete Inventory | Timeline to Remove Barriers |
|------------------------------------|-----------------------------|--------------------------------|-----------------------------|
| City Hall | 1333 NW Eastman Parkway | Complete | 15 years |
| Public Safety and Schools Facility | 1331 NW Eastman Parkway | Complete | 15 years |
| Red Barn at Main City Park | 219 S Main Street | Complete | 25 years |
| Kyoudou Center at Main City Park | 219 S Main Street | Complete | 25 years |
| Rockwood Public Safety Building | 675 NE 181 st | 2 years | 15 years |
| Wastewater Treatment Plant | 20015 NE Sandy Blvd | 2 years | 25 years |
| Downtown Parking Lots | Nine locations | 2 years | 15 years |
| Operations Center | 2123 SE Hogan Road | 2 years | 25 years |
| Fire Station 72 | 500 NE Kane Drive | 2 years | 25 years |
| Fire Station 73 | 2301 SW Pleasant View Drive | 2 years | 25 years |
| Fire Station 74 | 1520 NE 192 nd | 2 years | 25 years |
| Yamhill House | 19309 SE Yamhill | 2 years | 25 years |

⁵ The inventory includes facilities constructed or remodeled after the passage of the ADA. Though few areas of ADA non-compliance are anticipated, this more comprehensive approach ensures that all facilities are measured against a common ADA standard, even though different construction standards may have existed when the previous construction work was done.

6.2. Parks

The timelines for completing inventories and removing identified barriers at developed parks is described below.

| Park Name | Location | Timeline to Complete Inventory | Timeline to Remove Barriers |
|-------------------------------|------------------------------------|--------------------------------|-----------------------------|
| Arts Plaza | 401 NE 2nd St | 2 years | 15 years |
| Aspen Highlands Park | 147 NE 24th St | 2 years | 20 years |
| Bella Vista Park | 401 NW Bella Vista Dr | 2 years | 20 years |
| Butler Creek Park | 2385 SW 27th Dr | 2 years | 20 years |
| Cedar Park | 601 NE 8th St | 2 years | 20 years |
| Davis Park | 322 NE 194th Ave | 2 years | 20 years |
| East Gresham Park | 237 SE Williams Rd | 2 years | 20 years |
| Gradin Community Sports Park | 2303 SE Palmquist Rd | 2 years | 15 years |
| Hall Park | 2727 NE 23rd St | 2 years | 20 years |
| Hogan Butte Nature Park | 757 SE Gabbert Rd | 2 years | 20 years |
| Hollybrook Park | 535 SW Birdsdales Dr | 2 years | 20 years |
| Kane Road Park | 500 NE Kane Dr | 2 years | 20 years |
| Kirk Park | 1087 NE 188th Ave | 2 years | 20 years |
| Linneman Station | 3804 W Powell Loop | 2 years | 20 years |
| Main City Park | 101 S Main Ave | 2 years | 15 years |
| Mayor Charles Becker Park | SW 41 st and Tegart St. | 2 years | 20 years |
| Nadaka Nature Park | 17615 NE Glisan St | Assessment Complete | 15 years |
| North Gresham Park | 1111 SE 217th Ave | Assessment Complete | 20 years |
| Pat Pfeifer Barrier-Free Park | 424 NE 172nd Ave | Assessment Complete | 15 years |
| Red Sunset Park | 2403 NE Red Sunset Dr | Assessment Complete | 15 years |
| Rockwood Central Park | 17707 SE Main St | Assessment Complete | 20 years |
| Thom Park | 1135 SE 9th St | 2 years | 20 years |
| Vance Neighborhood Park | 1400 SE 182nd Ave | 2 years | 20 years |
| Yamhill Neighborhood Park | 19309 SE Yamhill St | 2 years | 20 years |

6.3. Curb Ramps

Approximately 5,000 curb ramps are not at least substantially compliant with ADA. The City anticipates constructing or upgrading the following number of ramps per year:

| Year | 2024-2026 | 2027-2032 | 2033-2086 | Total |
|-----------------|-------------|--------------|--------------|-------|
| Number of Ramps | 75 per year | 125 per year | 100 per year | 5,000 |

Ramps will typically be improved in conjunction with street alteration projects programmed through the City's Capital Improvement Program. The street alteration projects will be selected based on the condition of the pavement, not the priority level of the adjacent curb ramps, so it is anticipated that not all ramps addressed through these projects will necessarily be in the higher priority areas or will address the most deficient curb ramp locations. For stand-alone projects, however, curb ramps identified as "Deficient" in Area 1 will be the highest priority for the City to address.

6.4. Traffic Signals

Through upgrades required by adjacent paving projects, ongoing maintenance work and response to customer requests, the City will gradually improve the accessibility of specific intersection crosswalks.

Many features related to a signal's accessibility to pedestrians using mobility devices are generally outside the scope of a lower-budget maintenance project. In these cases, more substantial addressing of ADA-related deficiencies will need to wait until signal reconstruction. Signals are reconstructed primarily to address deficiencies in capacity and to replace aged infrastructure. During a signal reconstruction project, there is often the opportunity to acquire the right-of-way necessary to address pedestrian accessible routes, pushbutton locations, and similar elements.

The timing of ADA-related improvements that are done in concert with maintenance actions or in response to customer requests is uncertain. However, based on previous practice, it is anticipated that the City will bring 1-3 signals into full compliance each year for the foreseeable future, as shown in the table below. Increased frequency of reconstruction is expected over time as our signal infrastructure ages.

| Year | 2024-2043 | 2044-2053 | 2054-2074 | Total |
|-------------------|------------|------------|------------|-------|
| Number of Signals | 1 per year | 2 per year | 3 per year | 83 |

6.5. Sidewalks

6.5.1. Missing Links

The City is committed to completing missing links and / or establishing appropriate alternatives for pedestrian routing. The City continues to commit substantial resources each year toward accomplishing its goal to improve the continuity of sidewalks / accessible pedestrian routes across the transportation system.

6.5.2. Structural and Maintenance Defects

As noted earlier, there may be numerous barriers in the City's right-of-way which impede pedestrian access routes. Some are seasonal, such as vegetation growth, while others are more permanent, such as structures or utility poles. The City's approach to address structural and maintenance defects on sidewalks is as follows:

- As utility poles are replaced, the City will work with utility pole owners to try to relocate poles outside of the pedestrian access route.
- When public works projects encounter a structural encroachment to ADA accessibility, the City will seek to relocate the structural encroachments, such as mailboxes, that are barriers to pedestrian access routes. Such relocation efforts may also be pursued when a private development requires significant improvements to the adjacent street frontage.
- Maintenance defects such as overgrown vegetation or heaves, cracks, or lifts, may be reported to the City's code compliance department. The property owner adjacent to the sidewalk defect is responsible for correcting the maintenance defect per GRC 7.15.040. Once the City receives a complaint from a community member, the City's code compliance department notifies the responsible property owner of the defect and the obligation to correct the defect.

6.6. Shared Use Paths

The timelines to complete inventories and remove identified barriers at shared use paths is described below.

| Path Name | Length | Inventory | Barrier Removal |
|------------------------|--------|-----------|-----------------|
| Gresham-Fairview Trail | 3.3 mi | 2 years | 20 years |
| Springwater Corridor | 4.4 mi | 2 years | 20 years |
| Wy'East Way | 2.0 mi | 2 years | 20 years |

6.7. Programs and Services

Barriers to City programs and services are addressed on an ongoing basis as they are identified.

See separate attachment: ADA Transition Plan - APPENDIX A for 2024
ADA Assessment Survey and Summary of Results

Survey Overview

- Web-based survey, notification through social media, GRESHAM newsletter, Community Connections (e-newsletter), and Around the Table (e-newsletter)
- Solicited responses for 7 weeks
- 58 respondents, some questions were skipped by respondents