



**Oregon Parks and Recreation Department**

# **ADA Transition Plan**

**March 2021**



Created by the Oregon Parks and Recreation Department utilizing information and technical guidance produced by BlueDAG, the Transportation Research Board, the American Association of State Highway and Transportation Officials, Federal Highway Administration Resource Center, and technical and regulatory guidance produced by the U.S. Department of Justice.

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## Executive Summary

The Oregon Parks and Recreation Department (OPRD) created this Americans with Disability Act (ADA) Transition Plan to guide the agency in removing accessibility barriers throughout state parks.

A primary goal of the ADA is to ensure equal participation in public life for all Americans with disabilities. Title II of the ADA covers programs, services, and activities of public entities, such as OPRD.

People with disabilities have a right to seek out camping, picnicking, and other recreational opportunities with the same expectation to participate as those without disabilities. Under Title II of the ADA, it is OPRD's responsibility to ensure that all services, programs, and activities, when viewed in their entirety, are readily accessible and usable by individuals with disabilities.

In the process of creating this Transition Plan, OPRD surveyed 273 unique facilities and identified 4,872 individual barriers and grouped them into three categories defined by the level of complexity: Low Barrier, Medium Barrier, and High Barrier. Each category has its own timeline:

### Low Barrier

- To be removed within five years
- Requires minimal resources to remediate
- Examples: replacing sink fixture controls, adding parking signage

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### Medium Barrier

- 30% to be removed in 10 years, 35% in 11-15 years, and final 35% in 16-20 years
- Requires project planning and scheduling, budget planning, and additional skill and resources to complete
- Example: creating accessible paths

### High Barrier

- 10% to be removed in five years, 20% in 6-10 years, 20% in 11-15 years, 25% in 16-20 years, and remaining 25% in 20-25 years
- Requires significant project scoping, planning, logistics, biennial budgeting, and even greater resources and expertise to complete
- Examples: paving project, retrofit restrooms, redesign campsites

Following completion of this Transition Plan, OPRD expects to remove identified barriers over the next 25 years.



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### Introduction and Overview

OPRD's mission is to provide and protect outstanding natural, scenic, cultural, historic, and recreational sites for the enjoyment and education of present and future generations.

OPRD takes the long view to protect Oregon's special places and provide the greatest experience while creating stable future funding.

OPRD operates Oregon's state parks through a headquarters staff in Salem and three field regions. OPRD is also responsible for the Office of Outdoor Recreation, the State Historic Preservation Office, Oregon's Recreation Trails, the Ocean Shores Recreation Area, Scenic Waterways and the Willamette River Greenway.

OPRD was created as a branch of the Highway Department in 1921. The 1989 Legislature created a separate Parks and Recreation Department, effective in 1990. Oregon's state parks are among the most popular in the United States. A combined day-use and camping attendance of more than 47 million annual visitors consistently ranks the system among the ten most visited park systems in the nation. With more than 47 million visitors each year, the agency ranks third in the nation for day use and sixth in the nation for overnight camping.

The Oregon Parks and Recreation Department is divided into three main areas: Field Operations, Heritage Programs, and Support Services.

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**Field Operations** comprises the Coast Region, Valleys Region, and Mountain Region, which are collaboratively responsible for the on-the-ground operation and natural resource management of over 259 recreational properties, including 54 parks that offer overnight accommodations.

**Heritage Programs** is responsible for the management of all federal and state heritage programs. Through its boards and commissions, the division coordinates programs that advocate for historic cemetery conservation, advise on historic preservation policy, designate historic properties, provide grants to heritage programs, issue grants to museums and historical societies, and implement the Oregon Historic Trails Plan.

**Support Services** comprises the following departments: Finance, Budget, Information Services, Grants and Community Programs, Park Development and Renewal, Contracts, Safety and Risk, Human Resources, Communications, and Government Relations and Policy. Collaboratively, support services provide administrative, legislative, legal, compliance, and park improvement services for the agency and its partners.

### **The Americans with Disabilities Act**

Adopted on July 26, 1990, the ADA is a federal civil rights law that provides protections for people with disabilities against discrimination by both public and private entities. The ADA extends similar protections provided by Section 504 of the Rehabilitation Act of 1973.

Section 504 requires entities that receive federal financial assistance to ensure they do not discriminate against persons with disabilities when providing their services, programs, and activities.

The ADA prohibits discrimination on the basis of disability for operations conducted by state and local governments and for facilities owned by private businesses, even if no federal financial assistance is received.

Title II of the ADA covers programs and services provided by public entities, including those offered by OPRD. Under Title II, public entities must take all reasonable measures to ensure their services, programs, and activities are accessible to and useable by persons with disabilities. Additionally, Title II must reasonably modify policies, practices, or procedures to avoid discrimination against people with disabilities. Entities must evaluate the accessibility of their programs and facilities, and create a Transition Plan documenting the steps the agency will take to remove accessibility barriers.

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This Transition Plan was designed to help OPRD adhere to the above ADA requirements.

The ADA states that the plan must, at a minimum:

- Identify physical obstacles to accessibility in state park facilities, including parking, restrooms, picnic areas, and viewpoints.
- Describe how the agency will make the facilities accessible; and
- Provide a schedule for implementing facility upgrades

Additionally, the ADA requires public entities to offer physical accessibility and program accessibility.

### Physical Accessibility

An entity achieves physical accessibility when its facilities are free of barriers and obstacles that restrict their entrances and uses. OPRD will work toward ensuring our visitors have barrier-free access at each park, including parking, restrooms, and access to at least one recreational feature (camping, picnic tables, viewpoint, trail, interpretive signage, etc.).



### Program Accessibility

Program accessibility includes physical accessibility, but also includes all of the policies, practices, and procedures that allow people with disabilities to participate in programs and access important information. The ADA requires entities to provide individuals with disabilities an equally effective opportunity to participate in or benefit from its programs and services. As such, program accessibility must be achieved by both structural and non-structural methods. Examples of non-structural methods include acquiring or redesigning program areas to allow participation or providing alternate nearby sites for programming, where feasible. Whenever possible, OPRD will prioritize providing an integrated program setting that encourages interactions among all users, including individuals with disabilities.

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## Exemptions

The law allows for exemptions in specific cases:

- When removing a barrier would threaten or damage protected wildlife species, protected wildlife areas, and archeological, cultural, and historical features;
- When removing a barrier would cause undue financial burden or fundamentally alter the nature of our services and programs.

In these cases, OPRD will make every attempt to create alternatives to achieve program accessibility.





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### Transition Plan Development Process

OPRD used several tools to evaluate Oregon’s state park and historic site system. OPRD’s Universal Access Committee works to discuss, research, and recommend policy and goals for OPRD universal access issues in order to better serve a diverse customer base and to meet legal requirements. The OPRD ADA coordinator developed and delivered an ADA site evaluation training statewide between 2018-2020. Over 75 participants attended, included park managers, park rangers, engineering staff, grants staff, and partners. OPRD park rangers will continue to receive ADA-related training to increase their knowledge of the requirements and promote an accessibility lens as they improve park facilities and experiences for the public. In early 2021, the agency plans to solicit public comments online, hold an online public meeting to review the draft ADA Transition Plan, and conduct direct outreach to people with lived experience for feedback and recommendations. These processes are ongoing as the park system is constantly evolving to meet the recreational and cultural needs of Oregon.

### Universal Access Committee

The Universal Access Committee is an internal committee of OPRD staff that includes the ADA coordinator, the statewide volunteer coordinator, park managers, policy specialists, operations and support managers, and staff representing the Engineering, Communications, Heritage, Grants, and Safety and Risk departments. The Universal Access Committee works with executive staff, department leadership and the park regions to identify areas of improvements either assessed internally or generated from public feedback. This committee’s focus is to support OPRD’s goal of achieving greater accessibility.

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## ADA Site Evaluation Training

An ADA site evaluation training was developed for agency staff who would be performing the evaluations for the parks or programs. The ADA coordinator designed this instructor-led training in collaboration with Access Recreation to provide first-hand user perspective and experience. The training offered blended learning, including an informational component that described the ADA requirements for a Title II agency and an on-the-job component where participants practiced completing actual site evaluations. OPRD's ADA coordinator delivered these trainings statewide to over 75 park rangers. Participants gained the knowledge and experience needed to apply an accessibility lens when updating park facilities, interacting with the public, and conducting other agency work. OPRD is committed to providing this training to all staff on a regular basis so that all staff acquire a similar accessibility lens.

## ADA Site Evaluations

To obtain current information on accessibility at its parks and historic sites, OPRD conducted 273 site evaluations statewide, which included developed facilities, primitive sites, river greenway access and some undeveloped park properties. ADA site evaluations were completed by trained park rangers and the ADA coordinator.

ADA site evaluations were conducted using the BlueDAG mobile application tool to collect information on non-ADA compliant features and facilities within parks, which included but is not limited to:

- Parking lots
- Restrooms
- Fishing docks
- Campsites
- Beach access
- Picnic areas
- Visitor centers
- Park offices
- Trailheads
- Hiker and pedestrian trails
- Outreach program areas
- Program areas



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Evaluators uploaded data collected into the master database program (BlueDAG). The database program consolidated all field data into sortable tables such as data types, locations, structural feature types and priority. With this data, OPRD created its Transition Plan for removing each barrier.

### **Barriers and Priority Approach Development**

Improving accessibility to state parks and historic sites, particularly in older facilities built decades ago, requires substantial project improvements. OPRD is committed to continual improvement, with the understanding that funding constraints make implementing the goals outlined in this plan a long-term process.

The site evaluations reveal a variety of barriers across the park system. Certain barriers are very common and occur at many parks, while others are unique to only a few parks. A little over half of all barriers fall into three groups: doors, off-street parking, and restroom/shower facilities. There are also widespread barriers concerning features inherent to parks: accessible trails and routes (e.g. surface, width); camping areas (e.g. fire ring); and day-use areas (e.g. picnic tables). Furthermore, many parks have accessibility issues related to blended transitions, clear floor space, and reach ranges.

The prevalence of these barriers diminishes the park experience for people with disabilities. Based on an Oregon resident survey, the 2019-2023 Oregon Statewide Outdoor Recreation Plan (SCORP)<sup>1</sup> provides the following list of statewide accessibility accommodation priorities<sup>2</sup>:

- More accessible paved trails
- More benches along trails
- Rehabilitation of a recreation area or facility that does not meet access requirements of the ADA
- More accessible parking
- Public transportation to parks

There is a clear linkage between these priorities and the findings from the site evaluations.



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<sup>1</sup> Oregon Parks and Recreation Department. (2019). *2019-2023 Oregon Statewide Outdoor Recreation Plan*. <https://www.oregon.gov/oprd/PRP/Documents/SCORP-2019-2023-Final.pdf>

<sup>2</sup> From Table 12.64 of report (pg. 231).

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Removing common barriers across the park system may not address all of these priorities, but it will help improve outdoor recreation experiences for people with disabilities in Oregon.

Barriers were categorized based on barrier removal complexity, resources, and funding. These barriers were categorized into three sections: low, medium, and high barrier. OPRD also recognizes the need to prioritize these projects with consideration to funding and capacity resources.

### Low Barriers

- Requires minimal resources to remediate
- Are common among all three regions
- Can be fixed without reasonable delay
- Examples: relocating soap dispensers, replacing sink fixture controls, adding parking signage



### Medium Barriers

- Requires project planning and scheduling, and additional skill and resources to complete
- Requires budget planning consideration
- Examples: adding surface material, replacing plumbing fixtures, creating accessible paths



### High Barriers

- Requires significant project scoping, planning, logistics, resources and expertise skill
- Requires funding sources (e.g. grant applications) to be considered at each biennium
- Examples: paving project, retrofit restrooms, redesign campsites

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## Program Evaluation

As part of developing the Transition Plan, the Universal Access Committee evaluated OPRD programs to ensure they are not only physically accessible to individuals with disabilities, but also that the policies, practices, and procedures in place allow individuals with disabilities to participate and access important information.



OPRD serves the public through a variety of outreach programs to encourage participation in outdoor recreation, add value to one's experience outdoors, and build community. Examples include interpretive programs, special events, and private outreach events that target under-represented community groups.

The agency must ensure individuals with disabilities are able to physically access the spaces where programs are held, where possible, or provide an equally effective opportunity to participate in or benefit from these programs. Each ADA Site Evaluation addresses park-specific plans to remove barriers.

In addition, OPRD coordinates several advisory committees, grant committees, and boards for which members advise the agency on decisions about where to allocate money and resources; distribute grant money for recreation and historic improvement projects throughout the state; and review and recommend changes in the rules that govern how the agency operates. These public bodies serve the following programs:

- Oregon Heritage
- Scenic Bikeways
- Scenic Waterways
- ATV Safety and Education
- Scenic and Regional Trails
- Recreation Grants and Community Services

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OPRD will strive to make participation in its boards and committees accessible by creating and maintaining accessible documents, websites, and program-related materials. Public meetings, conferences, and trainings will either be offered at locations that are accessible and/or reasonable accommodations will be offered to individuals.

Program accessibility depends on accessible communication. The Communications Division is responsible for ensuring agency communication channels are accessible to individuals with disabilities. These channels include facility signage, publications, websites, and social media accounts. The agency follows industry accessibility standards regarding its signs and websites. Additionally, the agency uses the Oregon Relay Service to allow individuals with hearing impairments to converse with OPRD staff over the phone.

Program accessibility is an ongoing process. The Universal Access Committee will continue to collaborate with each division by identifying areas of improvement, providing best practices, and serving as a resource.



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### Transition Plan

The Transition Plan analyzes each property's unique facilities and identifies individual barriers. The plan prioritizes projects and provides an implementation timeline. Recent budget constraints as a result of the worldwide COVID-19 pandemic have created a significant budget challenge for OPRD. Nonetheless, OPRD is committed to ensuring a wide range of opportunities for individuals with disabilities. Additionally, the agency will maintain equipment and features that provide access and/or reasonable accommodation to people with disabilities.

The three most common barrier groups identified represents 52% of all barriers: doors, parking lot issues, and toilets and bathrooms. A complete list of all barriers identified can be found as 'Attachment 1' in the Appendix.

### Approach and Timeline

OPRD will focus on removing low, medium, and high barriers within a 25-year timeline further described below. Barrier removal commences July 2021 and concludes June 2046. This timeline provides OPRD the necessary time to ensure barrier removal is attainable and achievable given budgetary and capacity constraints.

#### Low Barrier Removal and Timeline

OPRD's goal is to remove a majority of identified low barriers statewide within five years of the Transition Plan approval. Low barriers as described above require minimal resources to remediate.

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### Medium Barrier Removal and Timeline

OPRD's goal is to remove 30% of medium barriers within 10 years of the Transition Plan approval. An additional 35% of medium barriers would be removed between 11-15 years. The remaining 35% of medium barriers would be removed in 16-20 years. Medium barrier removal as described above requires project and budget planning, scheduling, and additional skill and resources to complete.

### High Barrier Removal and Timeline

OPRD's goal is to remove 10% of high barriers within five years of the Transition Plan approval. An additional 20% barrier removal between 6-10 years, 20% between 11-15 years, 25% between 16-20 years, and the remaining 25% of high barriers between 20-25 years. Removing high barriers require significant project planning and scoping, as well as major investments with funding consideration (e.g. grant applications) at the start of each biennium.

It is important to note that OPRD will not be able to remove all barriers identified in the ADA site evaluations. OPRD will consider the following factors when deciding to remove a barrier: life expectancy for the barrier identified; any applicable exemptions; whether the redesign plans include introducing a new barrier; and whether replacements for barriers already exist. The ADA coordinator will document reasoning for any barriers OPRD determines cannot be removed.

### **Funding**

The prioritization strategy and timeline listed above reflect a realistic path forward, given the financial reality the agency faces due to the current and potential economic fallout from the COVID-19 pandemic and the September 2020 wildfire crisis. These effects will ripple through the Oregon economy for years.

In March 2020, when the virus arrived in Oregon, OPRD closed day-use parks for over six weeks and campgrounds for 11 weeks while it retooled to meet state requirements for a safe reopening. The resulting loss in the agency's main revenue sources — Lottery funds and park visitors — forced the agency to lay off permanent staff and freeze hiring for seasonal staff. As a result, parks reopened with fewer rangers, and with fewer support staff available at headquarters.



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Then the statewide wildfire emergency delivered another blow. Thankfully, most park properties survived the devastation; however, some were not so fortunate. It will take significant resources to repair the damage and reopen the handful of parks that had to close.

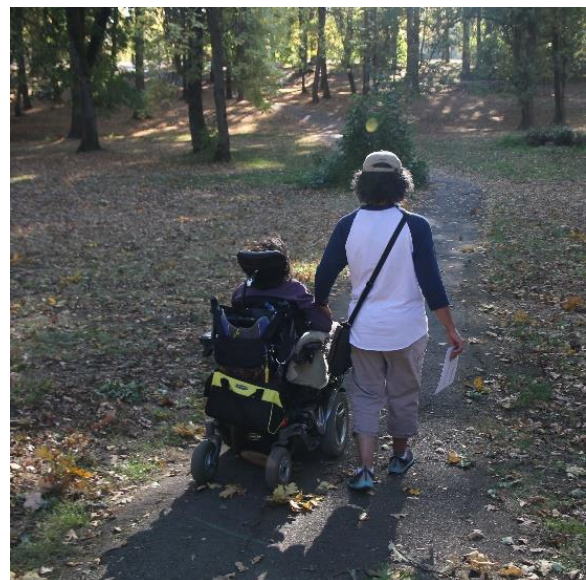
While these challenges present a temporary financial strain, the agency remains committed to moving forward its effort to remove barriers to access. OPRD has an opportunity to invest more intentionally in staff and facilities that lower the barrier to participation for every member of the community. Barrier removal and other accessibility measures are critical to the agency's mission, with the highest-priority projects selected for immediate attention. OPRD will also seek grant funding opportunities and community partnerships to assist with barrier removal and improve park access.

### **Public Involvement Process**

OPRD made every effort to ensure equitable access to the transition plan public involvement process, held January 11 to February 15, 2021. The agency posted an accessible draft ADA Transition Plan on its website and formally announced the comment period in a [January 11 news release](#). Additionally, OPRD reached out directly to organizations representing the disabilities community and people with lived experience. Members of the public had several options to provide comment: via an online form on the website, by mail, email, or through participation in a virtual hearing. All communications made clear the agency could provide alternate formats for the document and accommodations for participating in the meeting.

A copy of OPRD's ADA Transition Plan can be requested by mail, phone or email:

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OPRD ADA Coordinator  
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Email: [Helena.Kesch@oregon.gov](mailto:Helena.Kesch@oregon.gov)  
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## Appendix

### Attachment 1- Barriers Identified

Barrier Group	Number Identified	Examples of Barriers
Toilet and Bathing Rooms	1138	Stall width, soap dispenser height
Parking - off street	692	No accessible stall, no access aisle, no sign
Doors	686	Weight, width, threshold
Trails	369	Width, slope
Clear Floor Space	273	Not compact, stable or firm
Outdoor Constructed Feature	264	Shelter,
Reach Ranges	163	More than 25 inches
Accessible Routes	158	No accessible path to building
Outdoor Recreation Access Route	155	No accessible path to outdoor recreation
Blended Transition	134	Lip greater than ¼ inch
Operable Parts	125	Water faucet control
Picnic Units	91	Not enough accessible picnic tables
Sales and Service Counters/Tables	74	Tables is not accessible
Custom/Special	68	Undeveloped property
Ramps (not a curb ramp)	63	Ramp to building
Camp Shelters	55	Not enough accessible campsites
ATMs and Fare Machines	45	Fee machine not accessible
RV Parking	44	Not 20 feet wide
Drinking Fountains	35	Not accessible
Beach Access Route	34	Not accessible
Curb Ramps	31	No curb cutout at parking
Outdoor Recreation - Parking	23	Parking space width
Fire Extinguishers	21	Reach range
Boating Facilities	19	Slope, threshold
Kitchens, Kitchenettes, Wet Bar	14	Height

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Pedestrian Access Routes	14	Width, slope
Signs	12	Height, missing
Gates	11	Latch
Dining/Bar and Work Surfaces	8	Height
Stairways	8	No accessible route
Assembly Areas	7	Not accessible
Fishing Piers and Platforms	6	Threshold, width
Fire Alarms	5	Not accessible
Protruding Object	5	Obstruct access route
Check-out aisles	4	Height of counter
Knee Clearance	3	Height
Assisted Listening Devices	3	Missing
Dressing/Fitting/Locker Rooms	3	Height of coat hook, bench
Play Area	2	Not accessible
Tent Pads and Tent Platforms	2	Not enough accessible
Transaction Counters	2	Height
Turning Space	2	Not provided
Pool/Spa	1	Not accessible
<b>Total</b>	<b>4872</b>	