March 22, 2019

Via mail and email

Prosper Portland
222 NW Fifth Ave.
Portland, OR 97209-3859

Re: Equity, Integration, and Universal Design in Broadway Corridor

Dear Mayra Arreola, Sarah Harpole, and June Reyes,

Broadway Corridor is perhaps Portland’s most promising redevelopment opportunity for helping people with disabilities become more fully integrated in our community. I write to share our concerns that the current design concepts being considered for the Broadway Corridor risk excluding people with disabilities. We ask that you incorporate universal design principles into the project and listen to the voices of Portland’s disability community.

Disability Rights Oregon is a non-profit organization that advocates for the rights of Oregonians with disabilities. We are also Oregon’s federally designated Protection and Advocacy system and, as such, we have a unique role in upholding the rights of people who have disabilities. We advocate for public policies that will protect and increase the independence, safety, and integration of the disability community.

We have closely monitored the progress of the Broadway Corridor Steering Committee and Prosper Portland since the earliest stages of development. Our staff attorney Matt Serres attended Prosper Portland’s “Developer Candidate Forum” and many meetings of the Steering Committee as a public observer over the past year. He has also scrutinized the refinements that have been made over time to the proposed concepts for the project. We are encouraged by the accountability to many underserved groups and commitment to equity that has run through much of the planning process. We are concerned, however, that the voices and unique needs of people with disabilities have not been adequately heard.

The Broadway Corridor is vitally important to ensuring that Portland fulfills its potential of being an inclusive and accessible city for individuals with disabilities. Broadway Corridor is an opportunity for the City of Portland to make important strides toward becoming a community that includes everyone. To achieve that potential, the project must live up to its stated goal of welcoming Portlanders of all disability statuses. By its own measure, Prosper Portland strives...
to engage and elevate the voices of underrepresented groups, including persons with disabilities, in each phase of planning and design. The project’s equity goals also state that the project will utilize universal design so all public spaces can be used by all community members.

Historically, people with disabilities have been denied economic opportunities. True social equity means enabling persons with disabilities to benefit from the opportunities for jobs in the community and business ownership that will flow from Broadway Corridor. When weighing community benefits and considering social equity, planners should ensure that individuals with disabilities have access to opportunities generated by the project. With careful planning, the Broadway Corridor project can expand economic opportunities for people with disabilities and allow greater integration within the Portland community.

Prosper Portland and those involved in planning the Broadway Corridor must apply the concept of accessibility broadly. Accessibility includes how information is communicated and formatted, how institutional procedures and services are structured, how economic burdens for individuals with disabilities are accounted for, and how perceptions (and stigmas) toward persons with disabilities are reflected. Accessibility extends far beyond the physical environment to encompass social, economic, and institutional processes, as well as inclusion in the design process itself.

At this critical juncture in the concept selection phase, physical accessibility is also a key consideration in terms of how the project envisions the built environment.

Disability Rights Oregon has reviewed the three major design concepts of “play,” “nature,” and “discovery,” and analyzed how physical accessibility may be reflected in those concepts. We have applied the following design principles to our analysis of those broad concepts:

- The importance of even walking surfaces and unique challenges that inclines may pose for individuals with disabilities;
- The impact of vehicular access on persons with disabilities who rely primarily on pedestrian travel and, conversely, vehicular access points for persons with disabilities who rely more heavily on vehicles for mobility;
- The benefit of well-delineated and predictable pathways in order for people with disabilities to find their way (way-finding);
- The benefit of a well-integrated and accessible public transportation hub for individuals with disabilities;
- Public spaces that afford uses for mobility devices as well as other uses.

Based on our review, there is no single concept that best exemplifies those elements of physical accessibility. What is most important is that, at every stage of development, Prosper Portland should consider how proposed concepts account for considerations like those listed above. Each of the currently proposed concepts affords its own unique challenges with respect to those design considerations.
For instance, the “nature” concept may require planners to pay particular attention to how it ensures even walking surfaces, minimizes inclines, and affords way-finding for individuals with disabilities given its more organic and less predictable pathways. The reduced vehicular access may benefit persons with disabilities who rely on pedestrian travel, but may require more precise planning in terms of access points for those who rely on vehicles for physical mobility. The “Woonerf”-style shared street for Johnson may present a particular challenge for people with disabilities, if there is no pedestrian through route safe from bicyclists and Portland’s burgeoning population of e-scooters. For individuals with blindness or deafness, providing safe and identifiable passages through shared spaces may be the difference between providing a welcoming environment for persons with disabilities and providing a no-go zone—an urban wilderness of potential dangers and physical harms. Those safe passages ensure use by other community members as well, including the elderly and families with children.

The “play” concept may afford greater potential for even walking surfaces and fewer inclines and more straightforward way-finding with its well-delineated boundaries and pathways. However, terracing north of Johnson may pose a particular challenge for individuals with disabilities. Additionally, bleacher style seating in the public spaces at the north and south borders of the park block extension needs to account for wheelchair access and other ADA accessibility requirements. Programming for those park blocks is at its best when it considers how to integrate persons with disabilities.

The “discovery” concept may have similarities to “play” in terms of even walking surfaces and fewer inclines. It might pose a somewhat greater challenge in terms of way-finding. But other features of “discovery” not present in the other concepts may benefit people with disabilities. For example, “discovery” has a well-integrated transportation hub at Union Station that could potentially benefit the disability community. The double-helix ramp to the Broadway Bridge, if sloped properly, could also afford a more accessible and novel route to the bridge as compared with the other concepts.

It is always better to plan for accessibility than to have to respond to inaccessibility after the project is underway or complete. As the Broadway Corridor nears completion of the initial concept evaluation phase, planners ought to carefully consider how universal design elements within the project’s public spaces may benefit individuals with disabilities. When examining accessibility within the physical, social, economic, and institutional spheres of the project, Prosper Portland should also seek more direct input from persons with disabilities. If the project truly intends to live up to its promises of accountability, social equity, and universal design, it must listen to the voices of Portland’s vibrant disability community.

Our staff is interested in having a face-to-face meeting with Prosper Portland to discuss our observations concerning Broadway Corridor planning. To arrange a meeting, please contact
staff attorney Matt Serres at (503) 243-2081, extension 219, or via email at mserres@dlore.org. We look forward to speaking with you in person.

Sincerely,

[Signature]

Jake Cornett
Executive Director