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These comments represent the views of the Portland Commission on Disability (PCoD) and the Accessibility in the Built Environment Subcommittee (ABE) as they pertain to the City of Portland's 2035 Comprehensive Plan Proposed Draft (2014). PCoD and ABE would like to acknowledge the City's integration of a disability perspective into the Portland Plan and would like to reiterate the importance of the Planning and Sustainability Commission's (PSC) recommendations that planners and policymakers continue to advance disability-friendly policies and programs as the revised Comprehensive Plan is implemented.

Public Testimony: These comments will accompany verbal testimony to PSC on October 28, 2014.

Integrated Strategies: How the Comprehensive Plan Should Address Disability for Portland: The Portland Plan detailed 10 actions that would help make Portland a more physically accessible and age-friendly city that were intended to implemented in the revision of the City's Comprehensive Plan. ii The following disability-related strategies should continue to be considered in order to further the quality of life and well-being of Portland's Disability Community, as well as that for all of Portland's citizens:

- (1) A Framework for Equity: The Disability Community in Portland has been and should continue to be understood from an equity perspective such as that detailed in the Comprehensive Plan Proposed Draft: "when everyone has access to the opportunities necessary to satisfy their essential needs, advance their well-being, and achieve their full potential."
- (2) Thriving Educated Youth: Access to educational instruction infrastructure and programs should be done in a manner that incorporates universal design principles and addressed the spectrum of disabilities, including those that are physical, cognitive, mental, sensory, emotional, and developmental.

- (3) *Economic Prosperity and Affordability*: The Disability Community must be provided opportunities for affordable and accessible housing, transportation, and services, as well as employment (re: City of Portland as a Model Employer). People with disabilities posses tremendous assets and offers opportunities for strengthen out workforce and economic development possibilities.
- (4) *Healthy Connected City*: The need for a healthy, connected city, which includes thriving and accessible centers and corridors, will become increasingly important to the Disability Community. Active transportation, accessible outdoors spaces, and buildings, and housing that meet the needs of people across the age and ability spectrums is needed. Furthermore, our city must foster engagement, interdependence, respect, and social inclusion.

Suggestions for Specific Language Changes:

- Seven Key Directions to Achieve the Vision:
 - Page I-9: An explicit mention of the word "accessibility" and/or "people of all ages and abilities" is needed in key direction 1, 5, and/or 7
- Chapter 1: The Plan and Guiding Principles
 - o **Guiding Principles (Page GP1-5)**: The section on "human health" should include reference to "for those of all ages and abilities."
- Chapter 3: Urban Form
 - Policy 3.4: All ages and abilities (Page GP3-7): Use of citywide design and development for "people of all ages and abilities" is critically important for future generations.
 - o **Policy 3.11: Housing in centers (Page GP3-9)**: Accessible/universally-designed housing should be prioritized with a quarter-mile of the Town Center core.
 - o **Policy 3.15: Accessibility (Page GP3-9)**: Design of centers to meet the needs of street users of all ages and abilities is critically important for future generations.
 - Regional Center Gateway (Page GP3-10): Development and redevelopment in Gateway should be looked to as an opportunity to pilot accessible and universally-design environments, including high-density housing that meets the needs of older adults and people with a range of disabilities, as well as universally-designed public places.
 - o **Policy 3.31: Housing (Page GP3-11)**: Special consideration within a quarter-mile should be made for older adults and people with disabilities.
- Chapter 4: Design and Development
 - Policy 4.4: Pedestrian-oriented design (Page GP4-6): Pedestrian-oriented design for a range of users is critically important for people of all ages and abilities.
 - Policy 4.12: Adaptable neighborhoods (Page GP4-6): Adaptable neighborhoods should detail the need for changing functional ability over time to allow for aging in place/community.

• Chapter 5: Housing

- o **Policy 5.7: Physically accessible housing (Page GP5-7)**: Physically-accessible housing is critically important for future generations.
- o **Policy 5.8: Accessible design for all (Page GP5-7)**: Accessible design for all should use universal design principles; however, other accessible and "useable" standards exist and should also be considered, when and where appropriate (e.g., visitable housing, specialized design for deaf and hard of hearing and/or blind and low-vision communities).
- Policy 5.17: Aging in Place (Page GP5-8): Facilitating opportunities for aging in place is critically important for future generations; however, aging in one's home is not always the best option and better neighborhood housing options are needed.

• Chapter 9: Transportation

- Goal and policy intent (Page GP9-1, bullet point 4): There is a need to be more explicit about "vulnerable road users" by detailing cyclists, pedestrians, and mobility-impaired people.
- O Goal 9.E: Positive Health Outcomes (Page GP9-5): At the end of the goal, add "for those across the life course."
- Policy 9.6: Transportation hierarchy for people movement (Page GP9-7):
 Transportation hierarchy for people movement: Consider that the hierarchy should include a higher tier for "Special accommodations"

ⁱ City of Portland (2014). 2035 Comprehensive Plan Proposed Draft. City of Portland, Bureau of Planning and Sustainability. Retrieved from http://www.portlandoregon.gov/bps/57352

ii City of Portland (2012). The Portland Plan. Retrieved from http://www.portlandonline.com/portlandplan/index.cfm?c=56527&