

2019 Title VI Program Update

Submitted in fulfillment of Title VI of the
Civil Rights Act of 1964 and FTA Circular 4702.1B



Dear Reader,

This year marks the 55th anniversary of the landmark Civil Rights Act of 1964—the vital legislation that outlawed discrimination and the crucial first step toward the ultimate goal of equal opportunity, fairness, and justice. While there is still much to be done it is encouraging to see how far we have come.

This landmark act has served as a baseline for the past five-and-a-half decades and was in place when TriMet was formed 50 years ago. As TriMet celebrates our 50th anniversary this year, we are grateful for the pioneering leaders who fought discrimination and those who continue to advance equality.

As the regional steward of public transportation, TriMet's commitment to civil rights is unwavering. Our Title VI program provides continuous oversight to ensure we are not only in compliance but working to advance the true intent of the law.

Everyday our system plays a critical role in supporting our community. We connect people to jobs, schools, services, family, and friends. With our focus on Title VI—our policies and our program efforts—we continue to ensure that people of color and low-income riders are a priority consideration when evaluating service changes, cost of fare, location of facilities, and health/human environmental impacts.

Throughout our Title VI program update process, we will be working with community partners to develop an equity lens. This will be applied to our program with the ultimate goal of growing our efforts across our agency and throughout the community. Diversity and inclusion—for our employees, riders and community—make us stronger and they continue to serve as our guiding principles. As we advance our Title VI program, we stand steadfast in our commitment to being one of the strongest and most comprehensive programs in the nation.



Doug Kelsey
TriMet General Manager



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Introduction

WHAT IS TITLE VI?

The United States has a long history of unjust treatment towards people of color. Although we have come a long way over the past few centuries, we still see disparities throughout our society along the lines of race and ethnicity – even in cases where decisions are made with the best of intentions.

The Civil Rights Movement of the mid-1950's and 60's brought the issues of segregation and racial injustice to the forefront of our national consciousness. The movement resulted in the historic passage of the Civil Rights Act of 1964, which included eleven “Titles” outlawing several types of race-based discrimination. One of these “Titles” – Title VI – included the following provision:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

The intent of Title VI is to remove barriers and conditions that prevent minority, low-income, and persons with limited English proficiency (LEP) from equal access to public goods and services. In effect, Title VI promotes fairness and equity in federally assisted programs and activities. Title VI is rooted in the Constitutional guarantee that all human beings are entitled to equal protection of the law, and specifically addresses involvement of impacted persons in the decision-making process.

There are many forms of unlawful discrimination based on race, color, or national origin that can limit the opportunity of underrepresented communities to gain equal access to services and programs. In operating a federally assisted program¹, a recipient cannot, on the basis of race, color, or national origin, either directly or through contractual means:

- Deny program services, aids, or benefits;
- Provide a different service, aid, or benefit, or provide them in a manner different than they are provided to others;
- Omit participation and access by limited English proficient persons; or
- Segregate or separately treat individuals in any matter related to the receipt of any service, aid, or benefit.

¹ The Civil Rights Restoration Act of 1987 amended each of the affected statutes by adding a section defining the word "program" to make clear that discrimination is prohibited throughout an entire agency if any part of the agency receives Federal financial assistance.

WHAT DOES THIS MEAN FOR TRIMET?

The policies, procedures, standards, practices, and analysis provided in this document illustrate how the Tri-County Metropolitan Transportation District of Oregon (TriMet) ensures compliance with Title VI. As a recipient of federal financial assistance through the Federal Transit Administration (FTA), TriMet is subject to the rules and regulations provided through FTA Circular 4702.1B “*Title VI Requirements and Guidelines for Federal Transit Administration Recipients*” effective October 1, 2012 (“Circular”). This report is provided as documentation of compliance with Title VI of the Civil Rights Act of 1964 in accordance with FTA grant recipient requirements.

About TriMet

TriMet is a mass transit district created by the Oregon legislature pursuant to Oregon Revised Statutes (ORS) Chapter 267. TriMet is a local government as defined under Oregon law, providing bus, light rail, commuter rail, and LIFT paratransit public transportation service in the Portland metropolitan area, providing about 100 million rides each year. Guided by a Board of Directors representing seven sub-districts, the organization is directed by a General Manager appointed by the Board and employs about 3,000 union and non-union employees.

The General Manager has overall responsibility for carrying out TriMet’s commitment to the Title VI program. TriMet’s Director of Transit Equity, Inclusion, and Community Affairs and the Title VI and Equity Programs Administrator are chiefly responsible for administering and monitoring Title VI requirements, but it is the duty of every employee, vendor and contractor of the agency to ensure compliance with nondiscrimination and to further civil rights protections. The TriMet Board of Directors must also approve the agency’s Title VI program prior to its submittal to FTA.

TRIMET’S COMMITMENT TO EQUITY

TriMet’s commitment to equity can be seen across our agency, the transportation system we manage, and the community we serve. Equity is integrated into the policies and practices we develop and implement. It is embedded in the investments we make and partnerships we build, our workforce, our approach to contracting and our ever growing connections to our community.

In partnership with our Transit Equity Advisory Committee we continue to look for areas across the agency to improve our overall equity strategy. Continuing to invest in transit equitably and embracing an inclusive model where equity is a core business objective is critical to TriMet.

As we look to increase our services over the years ahead we look forward to continuing to expand our commitment to equity and fairness within and across our system through the implementation of our Title VI program and beyond.

DEFINITIONS

The following terms and definitions are from FTA Circular 4702.1B unless otherwise noted.

Direct Recipient – An entity that receives funding directly from FTA. For purposes of Title VI, a direct recipient is distinguished from a primary recipient in that a direct recipient does not extend financial assistance to subrecipients, whereas a primary recipient does.

Discrimination – Any action or inaction, whether intentional or unintentional, in any program or activity of a federal aid recipient, subrecipient, or contractor that results in disparate treatment, Disparate Impact, or perpetuating the effects of prior discrimination based on race, color, or national origin.

Disparate Impact – A facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.

Disparate Treatment – Actions that result in circumstances where similarly situated persons are intentionally treated differently (i.e. less favorably) than others because of their race, color, or national origin.

Disproportionate Burden – A neutral policy or practice that disproportionately affects low-income populations more than non-low-income populations. A finding of disproportionate burden requires the recipient to evaluate alternatives and mitigate burdens where practicable.

Environmental Justice – Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” was signed by President Clinton on February 11, 1994. Subsequent to issuance of the Executive Order, the U.S. Department of Transportation (DOT) issued a DOT Order for implementing the Executive Order on environmental justice (EJ). The DOT Order (Order 5610.2(a), “Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” 77 FR 27534, May 10, 2012) describes the process the Department and its modal administrations (including FTA) will use to incorporate EJ principles into programs, policies, and activities.

Fixed Route – Public transportation service provided in vehicles operated along pre-determined routes according to a fixed schedule.

Limited English Proficient (LEP) Persons – Persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well.

Low-Income Person – As defined by TriMet, for the purposes of Title VI low-income is defined as a person whose median household income is at or below 150 percent of the U.S. Department of Health and Human Services (HHS) poverty guidelines.

Low-Income Population – Any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant

workers or Native Americans) who will be similarly affected by a proposed FTA program, policy or activity.

Low-Income Transit Route – A route that has at least one half of its total revenue mileage in a Census block or block group with a percentage of low-income population that exceeds the percentage of low-income population in the transit service area as a whole.

Minority Persons – Include the following:

- American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
- Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
- Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
- Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

Minority Population – Any readily identifiable group of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient populations (such as migrant workers or Native Americans) who will be similarly affected by a proposed Department of Transportation (DOT) program, policy, or activity.

Minority Transit Route – As defined by TriMet and in conformance with FTA 4702.1B. A route that has at least one third of its total revenue mileage in a Census block or block group with a percentage of minority population that exceeds the percentage of minority population in the transit service area.

National Origin – The particular nation in which a person was born, or where the person’s parents or ancestors were born.

New Transit Route - A proposed designation of a transit route not currently listed in the TriMet Code Chapter 22- Routes and Schedules; 22.05 Schedule Notices will be considered as a “New Transit Route” as referenced in Part II: Title VI Policies, Major Service Change Policy when such a route designation, if adopted, is to be included in the list of transit routes by subsequent amendment of the TriMet Code. The only such designation not considered as a “New Transit Route” is a change in route number and/or name only with no associated changes in routing, frequency, hours and days of service.

Non-minority persons – White (non-Hispanic)

Public Transportation – Regular, continuing shared-ride surface transportation services that are open to the general public or open to a segment of the general public defined by age, disability, or low-income. Public transportation includes buses, subways, light rail, commuter rail, monorail, passenger ferry boats, trolleys, inclined railways, people movers, and vans. Public transportation does not include

Amtrak, intercity bus service, charter bus service, school bus service, sightseeing service, courtesy shuttle service for patrons of one or more specific establishments, or intra-terminal or intra-facility shuttle services. Public transportation can be either fixed route or demand response service.

Recipient – Any public or private entity that receives federal financial assistance from FTA, whether directly from FTA or indirectly through a primary recipient. This term includes subrecipients, direct recipients, designated recipients, and primary recipients. The term does not include any ultimate beneficiary under any such assistance program.

Service Standard/Policy – An established service performance measure or policy used by a transit provider or other recipient as a means to plan or distribute services and benefits within its service area.

Subrecipient – An entity that receives federal financial assistance from FTA through a primary recipient.

Title VI Program – A document developed by an FTA recipient to demonstrate how the recipient is complying with Title VI requirements. Direct and primary recipients must submit their Title VI Programs to FTA every three years. The Title VI Program must be approved by the recipient’s board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA.

Transit Equity – TriMet defines Transit Equity as:

- Policies that promote the equitable distribution of burdens and benefits
- Promoting equal access to resources and services
- Engaging transit-dependent riders in meaningful planning and decision-making processes

Transit Provider – Any entity that operates public transportation service, and includes states, local and regional entities, and public and private entities. This term is inclusive of direct recipients, primary recipients, designated recipients, and subrecipients that provide fixed route public transportation service.

Part I: General Requirements

FTA requires that all direct and primary recipients document their compliance with DOT's Title VI regulations by submitting a Title VI Program to their FTA regional civil rights officer once every three years. For all recipients, the Title VI Program must be approved by the recipient's board of directors or appropriate governing entity or official(s) responsible for policy decisions prior to submission to FTA. Attachment A includes a copy of the TriMet Board of Director's (Board) resolution evidencing approval of TriMet's Title VI Program.

The General Requirements section of this report contains Title VI Program components required in Chapter III of FTA Circular 4702.1B. This section includes the following information:

1. Title VI Public Notice
2. Title VI Complaint Procedures
3. List of Title VI Investigations, Complaints, and Lawsuits
4. Public Participation Plan
5. Language Access Plan
6. Board Membership and Recruitment
7. Subrecipient Monitoring
8. Equity Analysis for Facilities Siting and Construction
9. Equity Analyses of major service and fare changes completed since the 2016 submission

TITLE VI NOTICE AND COMPLAINT PROCEDURES

TriMet posts the Title VI public notice on the agency website², in all vehicles (bus and rail), and in the administrative offices. TriMet's Title VI complaint form³ and procedures⁴ are also available on the agency website. The complaint form is located in Attachment B, Attachment C shows the vehicle notice, and Attachment D shows the administrative office notice.

TriMet's Title VI website notice is stated below:

TriMet Respects Civil Rights

TriMet operates its programs without regard to race, color, national origin, religion, sex, sexual orientation, marital status, age or disability in accordance with applicable law.

TriMet Title VI Policy Statement

Title VI of the Civil Rights Act of 1964 states:

"No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

² <http://www.trimet.org/about/titlevi.htm>

³ <http://www.trimet.org/pdfs/about/titlevi-complaint.pdf>

⁴ <http://www.trimet.org/about/titlevi-procedure.htm>

TriMet is committed to complying with the requirements of Title VI in all of its federally funded programs and activities. To request additional information on TriMet's Title VI nondiscrimination requirements, call us at 503-238-7433 (TTY 7-1-1) or send us an email at hello@trimet.org.

From the Title VI Circular

"[Recipients are required] to provide information to the public regarding the recipient's obligations under DOT's Title VI regulations and apprise members of the public of the protections against discrimination afforded to them by Title VI. At a minimum, recipients shall disseminate this information to the public by posting a Title VI notice on the agency's website and in public areas of the agency's office(s), including the reception desk, meeting rooms, etc. Recipients should also post Title VI notices at stations or stops, and/or on transit vehicles."

Making a Title VI Complaint

Any person who believes he or she has been aggrieved by an unlawful discriminatory practice under Title VI may file a complaint with TriMet. Any such complaint must be in writing or submitted via online fillable form and filed with TriMet within 180 days following the date of the alleged discriminatory occurrence. For information on how to file a complaint, contact TriMet by any of the methods below.

Mail

Civil Rights Title VI Investigator
1800 SW 1st Avenue, Suite 300
Portland, OR 97201

Direct Complaint Phone: 503-962-3453 (FILE)

Customer Service Phone: 503-238-7433

Fax: 503-962-2283

Email: hello@trimet.org

You may file a complaint directly with the Federal Transit Administration:

Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE
Washington, D.C. 20590

From the Title VI Circular

“[R]ecipients shall develop procedures for investigating and tracking Title VI complaints filed against them and make their procedures for filing a complaint available to members of the public. Recipients must also develop a Title VI complaint form, and the form and procedure for filing a complaint shall be available on the recipient’s website. FTA requires direct and primary recipients to report information regarding their complaint procedures in their Title VI Programs in order for FTA to determine compliance with DOT’s Title VI regulations.”

TriMet’s Civil Rights complaint procedures are as follows:

Civil Rights Complaint Procedure

Under Title VI, any person who believes they have been aggrieved by an unlawful discriminatory practice on the basis of race, color or national origin by TriMet may file a complaint by completing and submitting TriMet’s Civil Rights Complaint Form. In addition to Title VI protected categories, TriMet accepts allegations of discrimination complaints based on sex, gender identity, sexual orientation, age, religion, marital status, disability in accordance with Oregon Revised Statute 659A.403.

TriMet investigates complaints received no more than 180 days after the alleged incident. TriMet will process complaints that are complete. Once a completed Complaint Form is received, TriMet will review it to determine if TriMet has jurisdiction. The complainant will receive an acknowledgement letter informing the complainant whether the complaint will be investigated by TriMet.

TriMet will generally complete an investigation within 90 days from receipt of a completed Complaint Form. If more information is needed to resolve the case, TriMet may contact the complainant. Unless a longer period is specified by TriMet, the complainant will have ten (10) days from the date of the letter to send requested information to the TriMet investigator assigned to the case.

If TriMet’s investigator is not contacted by the complainant or does not receive the additional information within the required timeline, TriMet may administratively close the case. A case may be administratively closed also if the complainant no longer wishes to pursue their case.

After an investigation is complete, TriMet will issue a letter to the complainant summarizing the results of the investigation, stating the findings and advising of any corrective action to be taken as a result of the investigation. If a complainant disagrees with TriMet’s determination, he/she may request reconsideration by submitting a request in writing to TriMet’s General Manager within seven (7) days after the date of TriMet’s letter, stating with specificity the basis for the reconsideration. The General Manager will notify the complainant of his decision either to accept or reject the request for reconsideration within ten (10) days. In cases where reconsideration is granted, the General Manager will issue a determination letter to the complainant upon completion of the review.

TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

From the Title VI Circular

“FTA requires all recipients to prepare and maintain a list of any of the following that allege discrimination on the basis of race, color, or national origin: active investigations conducted by entities other than FTA; lawsuits; and complaints naming the recipient. This list shall include the date that the investigation, lawsuit, or complaint was filed; a summary of the allegation(s); the status of the investigation, lawsuit, or complaint; and actions taken by the recipient in response, or final findings related to, the investigation, lawsuit, or complaint. This list shall be included in the Title VI Program submitted to FTA every three years.”

Information regarding investigations, complaints and lawsuits for the reporting period is provided below.

Investigations

There was one State of Oregon Bureau of Labor and Industries (BOLI) investigation during the reporting period alleging race discrimination. It was dismissed by BOLI for lack of sufficient evidence to continue investigation on August 17, 2016.

Lawsuits

A Title VI/42 USC 1983 lawsuit was filed on October 25, 2018, alleging racial discrimination. The case is currently being litigated in U.S. District Court. TriMet filed a Motion for Summary Judgment on May 17, 2019. It was dismissed by the U.S. District Court on July 30, 2019.

Formal Complaints

Formal complaints submitted to TriMet were received, investigated and resolved by TriMet staff. Table I-1 lists formal complaints received during the reporting period.

The Action Taken/Findings category is designated in accordance with the following:

Cleared: The investigation concludes there was no violating conduct by the employee

Confirmed: Sufficient information has been obtained to determine the complaint as valid

Incomplete: There is insufficient information to make a finding of “Cleared” or “Confirmed”

Inconclusive: An irresolvable discrepancy exists between the employee’s and the customer’s account and no witness or evidence is available to corroborate either account.

TABLE I-1: TITLE VI COMPLAINTS RECEIVED BY TRIMET SINCE LAST PROGRAM SUBMITTAL

DATE FILED	SUMMARY	STATUS	ACTION TAKEN/FINDINGS
2/15/2017	Complaint filed with TriMet alleging bus operator called passenger a racial slur and challenged him to a fight.	Closed	Confirmed/Suspension and Mandatory Training
12/21/2017	Complaint filed with TriMet alleging fare inspector racially profiled her.	Closed	Inconclusive
4/3/2018	Complaint filed with TriMet alleging fare inspector racially profiled him.	Closed	Cleared
7/26/2018	Complaint filed with TriMet alleging unfair treatment by bus operator	Closed	Inconclusive
9/10/2018	Complaint filed with TriMet alleging fare inspector racially profiled him.	Closed	Incomplete
12/18/2018	Complaint filed with TriMet alleging unfair treatment by bus operator	Closed	Incomplete
2/12/2019	Complaint filed with TriMet alleging bus operator racially profiled him.	Closed	Cleared
4/1/2019	Complaint filed with TriMet alleging bus operator refused her service.	Closed	Inconclusive

PUBLIC PARTICIPATION PLAN

TriMet has an established comprehensive public involvement process to ensure minority, low-income and LEP populations are engaged through public outreach and involvement activities. TriMet's Public Engagement Framework (Attachment E) was originally submitted to the FTA on January 2013 as part of the response to the FTA's Title VI Program Review, and has been updated as part of this submittal. TriMet's Transit Equity, Inclusion, and Community Affairs Department serves as a resource to other TriMet divisions to integrate these populations into TriMet's public involvement activities.

From the Title VI Circular

“The content and considerations of Title VI, the Executive Order on LEP, and the DOT LEP Guidance shall be integrated into each recipient’s established public participation plan or process (i.e., the document that explicitly describes the proactive strategies, procedures, and desired outcomes that underpin the recipient’s public participation activities)... Recipients should make these determinations based on a demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, and the resources available.”

In proposing service or fare changes TriMet uses a variety of methods to communicate and solicit feedback from the community and targeted populations. TriMet also engages in extensive community outreach in conjunction with large-scale projects to ensure that affected residences and businesses are informed about the impacts and benefits of the project and are provided an opportunity for input in planning and implementation. On routes where there are a significant number of limited English proficient riders or households, TriMet staff translates materials to ensure those community members can participate. Special attention is paid to the identification of any transit-dependent persons potentially affected by a route or service change.

Consistent with the requirements of Title VI, TriMet staff use geographic information systems (GIS) mapping software to create maps that identify affected low-income, minority, and limited English proficient communities. The analysis is shared with TriMet staff working with affected communities to identify strategies to engage minority, low-income and LEP populations.

Public Participation Highlights

The following is a summary of TriMet’s inclusive public participation since its 2016 Title VI Program submission. The summary spans from September 2016 to June 2019. During this period, TriMet conducted outreach for:

- Service Enhancement Plans
- Listening Sessions and Future Transit Improvement Workshops
- Service and Fare Changes
- Budget Hearings and Open Houses
- Construction Projects
- 4th Operations and Maintenance Base
- 2019 Title VI Program Update

TriMet's Transit Equity Advisory Committee (TEAC)

The Transit Equity Advisory Committee helps to extend the agency's outreach and involvement to transit dependent riders, as well as serve as a link to community organizations. The panel also provides direction on the agency's transit equity strategy, giving input and guidance on:

- Title VI and Environmental Justice analysis;
 - Service Planning, operational and capital investments;
 - Improving service to transit dependent riders; and
 - Disseminating information about transportation services to community-based organizations, social service agencies and the community at large.
-



FIGURE I-1: TRANSIT EQUITY ADVISORY COMMITTEE AND GENERAL MANAGER DOUG KELSEY

Service Enhancement Plans (SEPs)

Since 2012, TriMet has been engaging the community to develop Service Enhancement Plans (SEPs) for the TriMet service district, organized into five geographic subareas (Eastside, North/Central, Southeast, Southwest, and Westside). These SEPs serve as a shared vision for future transit service in the region, and were developed through a robust, multi-year public engagement effort, with special focus on outreach to communities of color, limited-English-proficiency (LEP) populations, and low-income communities. Table I- displays the substantial concentrations of minority and LEP populations within each subarea.

In September of 2017, TriMet contracted with JLA Public Involvement (JLA) to work in partnership with community based organizations serving minority, low-income earning, and/or limited English proficiency communities to hold community meetings to discuss transit service priorities in each of the following areas of Washington County:

- Cornelius/Forest Grove
- Aloha/Beaverton
- Tigard/Tualatin/SW Portland.

JLA partnered with community-based organizations to conduct five bilingual discussion group meetings in the following languages: Spanish, Korean, Cantonese, Somali, and Swahili.

Each meeting included discussion of the following topics:

- Discussion on which of the specific improvements proposed in the draft SEP plans are most important to implement first
- Discussion on which improvement types are most important
- Discussion on investment options (focused, diverse, or balanced investment)

At the end of each meeting, participants completed questionnaires with more specific questions about participant transit usage, preferred improvements, and demographic information.

TABLE I-2: SUMMARY OF MINORITY AND LEP POPULATIONS BY SEP SUBAREA

SUBAREA	SUBSTANTIAL MINORITY POPULATIONS	SUBSTANTIAL LEP POPULATIONS
Eastside	- Hispanic (17%) - Asian (8%) - Black (5%)	- Spanish - Vietnamese - Russian - Chinese
North/Central	- Black (9%) - Hispanic (8%) - Asian (5%)	- Spanish - Vietnamese
Southeast	- Hispanic (8%) - Asian (6%)	- Spanish - Vietnamese
Southwest	- Hispanic (8%) - Asian (5%)	- Spanish - Vietnamese
Westside	- Hispanic (18%) - Asian (10%)	- Spanish

TriMet Listening Sessions and Workshops

TriMet held a series of public meetings between May and June 2018 where riders, neighbors and community members shared their thoughts on transit and helped TriMet prioritize service improvements throughout the region. The listening sessions provided the opportunity to meet TriMet's new general manager as well as the TriMet board member who represented a particular neighborhood/district. Table I- shows the date and location of each session. TriMet partnered with JLA Public Involvement for recruiting attendees as well as Immigrant & Refugee Community Organization for interpreters in various languages, staffing assistance at each event.

TABLE I-3: LISTENING SESSIONS DETAIL

DATE	LOCATION	KEY TRIMET REPRESENTATIVE
May 16, 2018	Tigard	General Manager Doug Kelsey and TriMet Board Member Linda Simmons
May 17, 2018	Downtown Portland	General Manager Doug Kelsey and TriMet Board Member Joe Esmonde
May 22, 2018	Rockwood	General Manager Doug Kelsey and TriMet Board Member Travis Stovall
May 29, 2018	Oregon City	General Manager Doug Kelsey and TriMet Board Member Craig Prosser
May 30, 2018	Hillsboro	General Manager Doug Kelsey and TriMet Board Member Bruce Warner
May 31, 2018	N/NE Portland	General Manager Doug Kelsey and TriMet Board Member Dr. T Allen Bethel
June 5, 2018	N/NE Portland	General Manager Doug Kelsey and TriMet Board Member Lori Irish Bauman

TriMet also held five workshops for future transit improvements based on the passage of Oregon House Bill 2017, which marked a significant statewide investment in transportation. HB 2017 includes an employee tax that will fund transit expansion and improvement throughout the state. The new tax will help fund the low-income fare program, more equitable service, and much more. In anticipation of receiving HB 2017 funds, TriMet engaged the community through the workshops and through an online survey in order to gain feedback on how TriMet should prioritize these new funds.

TriMet partnered with Immigrant and Refugee Community Organization to host these workshops, which included a light dinner, childcare and interpretive services. A summary of the feedback and more information regarding the workshops is located at this link:

<https://trimet.org/futureservice/workshops.htm#workshops>

Service & Fare Changes

In July of 2017, TriMet launched the **Hop Fastpass™ electronic fare system**. Extensive outreach promoting the advantages of the contactless smart card for public transit fare payment used email, print ads, social media and stakeholder lists to promote the fare payment option to youth, communities of color, low-income populations, limited English populations, seniors, and people with disabilities. The Title VI fare equity analysis entailed partnering with culturally-specific community-based organizations to gather feedback on proposed policies associated with the system. TriMet spoke with low-income, minority, and LEP riders throughout the service district to better understand potential impacts of proposed changes, and to develop mitigation strategies where appropriate.

In July of 2018, TriMet launched the **Low Income Fare Program**. Extensive outreach promoting the advantages of the reduced fare program used email, print ads, social media and stakeholder lists to promote the program to youth, low-income program, communities of color, limited English populations, seniors, and people with disabilities. The Title VI fare equity analysis entailed partnering with culturally-specific community-based organizations to gather feedback on proposed policies associated with the system. TriMet spoke with low-income, minority, and LEP riders throughout the service district to better understand potential impacts of proposed changes, and to develop mitigation strategies where appropriate.

Finally, in fall 2016, 2017, and 2018 TriMet hosted seven open houses for the Fiscal Year 2018, 2019, and 2020 **Annual Service Changes** which included many service enhancements developed through the SEP process, some of which involved new transit routes, route changes, increases in frequency and span as well as two all-night routes. TriMet sent letters to the areas where stops would close as well as where weekday and weekend service would be added.

Construction Projects

TriMet also conducted extensive outreach for several construction projects at MAX stations and one of the bus garages to improve safety, extend longevity and update appearance. In May of 2018, TriMet launched a multi-year major elevator improvement program to upgrade or replace 19 elevators throughout the system. The project includes heavily-used outdoor elevators along the MAX Blue, Green and Red lines in northeast Portland. The work will ensure the elevators remain safe and more reliable far into the future. Project begins with NE 60th Ave MAX Station TriMet sent stakeholder emails and neighborhood mailings in multiple languages to inform impacted communities of the project.

Between 2016 and 2018, TriMet launched a series of construction projects designed to improve MAX performance via repairs to aging rail and switch equipment on its original light rail alignment built in 1986. The projects included improvements at the end of the MAX Blue Line in Hillsboro, and in Portland near Providence Park, on Morrison and Yamhill at SW 11th Avenue, along 1st Avenue in Portland City Center. Due to the closing of some streets and disrupted light rail service, the outreach effort for these projects were extensive, including newspaper and online ads in multiple languages, presentations to business and cultural groups, numerous media releases, on-board outreach using Spanish & English service alerts, and mailings to residential/business addresses in the project area.

In fall 2018, TriMet began a multi-phased construction at Powell Garage site. The Powell Garage was built in 1976 as a temporary facility while the Center Garage was under construction. The reconfigured site will improve bus and employee circulation and safety at its access points, replace and modernize the aging buildings, and accommodate 50 percent more buses. The public involvement efforts dates back to November 2016 and will continue until project completion. Direct mailings were sent and several meetings were held with nearby residents, neighborhood associations, and businesses to give a project overview and address questions or concerns.

4th Operations and Maintenance Base

During the planning stages and prior to selection, initial community outreach to all four sites included direct mailings to the potentially impacted communities, including all business and residential properties within a ¼ of a mile from each site. The notice, invited recipients to call or email TriMet with

questions or comments, was mailed to approximately 693 neighbors. Limited English Proficient populations were also considered in the initial community outreach efforts to ensure meaningful awareness and input. That is, postcards were translated in Spanish, Chinese, and Vietnamese given the large presence of these populations in these areas.

After identifying Columbia site as the preferred site for the 4th bus operations and maintenance base, TriMet carried out numerous public engagement activities, spanning from March 2018 through June 2018. The following describes how TriMet engaged the potentially impacted community:

- Follow up postcards were mailed on May 16, 2018 to business and residential properties within a ½-mile radius around Columbia site announcing site selection, use, and public involvement process. Spanish translations mailings were included.
- Meetings with community stakeholders to inform the potential change in use of the site and to identify community interests and concerns.

Community Engagement for 2019 Title VI Program Update

The following items were completed to gather input on TriMet's Major Service Change, Disparate Impact, and Disproportionate Burden policies as well as TriMet's Language Access Plan update.

Title VI Working Group: TriMet staff researched disparate impact and disproportionate burden policies from 15 transit agencies and consulted with over 50 Title VI staff leads from FTA Region 9 and Region 10 transit agencies.

Transit Equity Advisory Committee: TriMet staff consulted with TEAC throughout the Program update process. At its April 9, 2019 meeting, TEAC reviewed and discussed the proposed updates to the Major Service Change, Disparate Impact, and Disproportionate Burden policies. The committee also gave input and helped refine the Title VI Program Update survey. At its July 9, 2019 meeting, TEAC reviewed and discussed initial feedback from the Title VI Program Update survey and received an update on the revised Language Access Plan.

Community service provider survey: TriMet also sent a questionnaire to staff at the 103 organizations participating in the agency's Access Transit fare program for low-income transit riders (see Attachment P). The questionnaire asked about Title VI program awareness, observations of changes to service or fares that have had a significant impact on clients served, thoughts on what else should be considered when making service changes, and examples of evaluating policies for potential disproportionate impacts to low-income persons and/or persons of color. TriMet received a total of 442 responses to the questionnaire.

Dedicated web page and email blast: Proposed Major Service Change, Disparate Impact, and disproportionate burden policies were then posted on trimet.org along with the full draft Title VI Program for public comment. How this outreach informed TriMet's Major Service Change, Disparate Impact, and Disproportionate Burden policies and thresholds is described in Part II: Title VI Policies.

LANGUAGE ACCESS PLAN

TriMet is committed to full compliance with Title VI and Executive Order 13166 to provide meaningful access to programs, services and benefits for persons with limited English proficiency, or LEP. In 2019, TriMet updated its **Language Access Plan** and Implementation Schedule after an extensive review of the LEP populations in the TriMet service district and their needs. Staff continue to use the recommended two-tiered approach to meet the needs of LEP populations: Tier One retains successful programs and activities designed to meet the language needs of LEP populations; Tier Two identifies new areas of focus to further the agency's goal of providing LEP customers with meaningful access to TriMet programs and services. This plan continues to guide TriMet as to how to best serve LEP populations and is provided as Attachment F.

From the Title VI Circular

Consistent with Title VI of the Civil Rights Act of 1964, DOT's implementing regulations, and Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" (65 FR 50121, Aug. 11, 2000), recipients shall take reasonable steps to ensure meaningful access to benefits, services, information, and other important portions of their programs and activities for individuals who are limited-English proficient (LEP).

Updated Four Factor Analysis

In accordance with FTA's policy guidance, the initial step for providing meaningful access to services for LEP persons and maintaining an effective LEP program is to identify LEP populations in the service area and their language characteristics through an analysis of available data. TriMet updated its Four Factor Analysis in the spring of 2019. It relied on the most recent data available, including:

- US Census Bureau, 2012-2016 5-year sample, American Community Service data
- Oregon Metro Regional Land Information System (RLIS)
- Oregon Department of Education Student Language of Origin data , 2017-2018
- Oregon Health Authority Public Health Women-Infant-Children program data, 2016-2018
- Oregon Judicial Department court language service request data, 2016-2019
- TriMet Geographic Information System
- Spring 2018 on-board rider survey
- Fall 2018 fare survey
- Summer 2018 operator survey regarding contact with LEP persons
- Fall 2018 road and rail supervisors survey regarding contact with LEP persons
- Call center language interpretation requests and views of translated webpage www.trimet.org
- 2019 TriMet language services survey

This updated analysis will guide TriMet efforts to retain successful programs and activities designed to meet the language needs of LEP populations, and identify new areas of focus to further the agency's goal of providing LEP customers with meaningful access to TriMet programs and services.

What is analyzed in a Four Factor Analysis?

1. The **number or proportion** of LEP persons eligible to be served or likely to be encountered by the program or recipient.
 2. The **frequency** with which LEP persons come into contact with the program.
 3. The **nature and importance** of the program, activity, or service provided by the program to people's lives.
 4. The **resources** available to the recipient for LEP outreach, as well as the costs associated with that outreach.
-

Census data is shown in Table I-4. This data shows that of the estimated total population aged five years and older within Clackamas, Multnomah, and Washington counties LEP populations represent 8.3 percent with the largest proportion consisting of Spanish speaking LEP individuals (3.8 percent).

The top five languages (Spanish, Vietnamese, Chinese, Russian and Korean) identified using US Census American Community Survey Tables: 2012 - 2016 (5-Year Estimates) mirror the top five languages identified in the 2012 Four Factor Analysis performed by TriMet using the ACS 2006-2010 five-year sample data. These top five languages comprise 73.4 percent of the total LEP population as shown in Table I-.

Additionally, using Oregon Department of Education data, Somali was identified in 2018 as meeting ODT's "safe harbor" threshold of 1,000 or five percent of the population. Specifically, the data indicated that Somali is the sixth most common language spoken by students in the ESL Program (see Attachment F – 2019 Language Access Plan and 2019 Four Factor Analysis Update).

The map on page 20 (Figure I-2: LEP population and TriMet district) depicts where these LEP populations are concentrated in relation to the TriMet service district. Areas are shaded corresponding to census tracts which had a LEP population greater than or equal to the average for the TriMet District (8.3 percent). Most LEP census tracts are located in the western, eastern, and northern parts of the service area.

TABLE I-4: ACS LANGUAGES SPOKEN BY LEP PERSONS AGE 5 AND OLDER IN TRIMET DISTRICT

Languages Spoken at Home	LEP Population Estimate	% of Total Population	% of LEP Population
Spanish	56,605	3.8%	46.1%
Vietnamese	13,598	0.9%	11.1%
Chinese (Cantonese, Mandarin)	9,892	0.7%	8.1%
Russian	6,656	0.5%	5.4%
Korean	3,259	0.2%	2.7%
Ukrainian	2,948	0.2%	2.4%
Arabic	2,336	0.2%	1.9%
Tagalog	2,095	0.1%	1.7%
Japanese	1,867	0.1%	1.5%
Mon-Khmer, Cambodian	1,658	0.1%	1.3%
Persian/Farsi	1,159	0.1%	0.9%
Other (e.g., Romanian and Somali)	20,799	0.1%	16.9%
Total	122,872	8.3%	

Sources: TriMet GIS, Metro Regional Land Information System, and US Census ACS Tables: 2012 - 2016 (5-Year Estimates).

CONTINUED LANGUAGE SERVICES

TriMet’s web page contains links to information in Spanish, Vietnamese, Russian, Chinese, and Korean. In addition, the landing page for Spanish contains a Trip Planner en español. Spanish speakers can also access TransitTracker™ (real-time arrival information) en español by calling 503-238-7433 thereby accessing real time information on the next train or bus arrival. All LEP customers can access language assistance by calling 503-238-7433. In the past three years, language assistance has been provided to customers comprising over 50 languages. Seventy percent of all the calls requesting language assistance are from Spanish Speaking customers. TriMet’s multilingual web pages were also updated to include Title VI Civil Rights notification and complaint procedures as approved by the FTA.

The LEP program continues to coordinate with the agency’s outreach efforts regarding budget, service and fare changes, and construction projects to carry out targeted outreach to LEP communities that would be affected by proposed changes. The program continues to use bus bench ads in Spanish to

promote the use of public transportation. TriMet also developed bilingual channel cards in English/Spanish for placement on all TriMet vehicles that communicate vital customer information for the following: Fare requirements, availability of TriMet customer assistance, safety and the rules for riding. A concept of a Language Assistance channel card is shown in Figure I-3. Placement on fixed-route, paratransit, and light rail vehicles will take place in fiscal year 2020. Existing channel cards shown in Figures I-4 through I-6 have already been placed in all vehicles. TriMet also expanded the number of languages included in its “How to Ride brochure”. Figure I-7 shows the updated brochure cover.

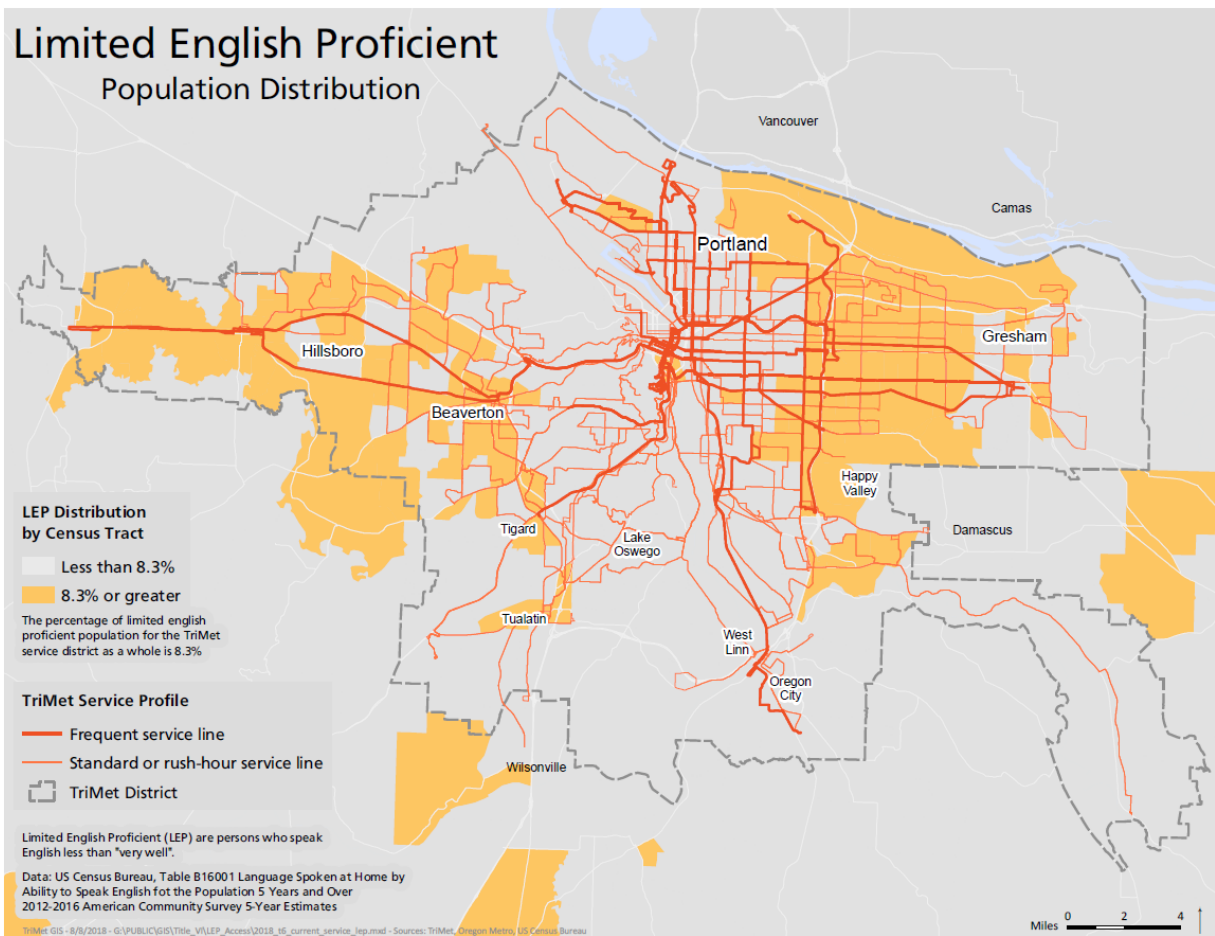
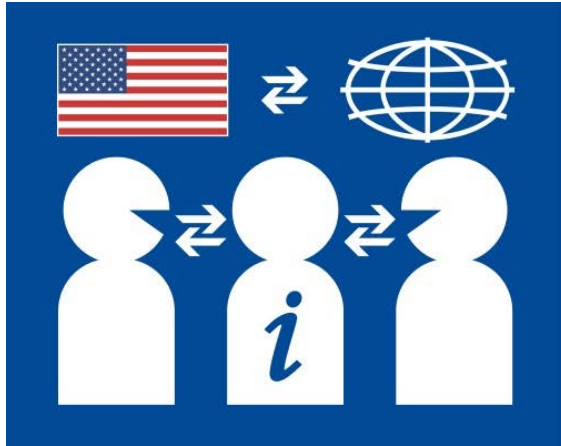


FIGURE I-2: LEP POPULATION AND TRIMET DISTRICT



For Language Assistance call
 Si necesita interprete, llame al
 Nếu cần trợ giúp về thông dịch xin gọi
 如需语言帮助请致电
 Для службы языковой поддержки
 언어 통역이 필요하시면, 으로 전화 하시면 됩니다

503-238-7433

FIGURE I-3: BILINGUAL LANGUAGE ASSISTANCE CHANNEL CARD



FIGURE I-4: BILINGUAL SAFETY CHANNEL CARD



FOR YOUR SAFETY

Para su seguridad



Need help? If there's an emergency or an unsafe situation on board, tell the operator or call 9-1-1.
¿Necesita ayuda? Si hay una emergencia o una situación de inseguridad a bordo, comuníquese con el conductor o llame al 9-1-1.



Stay off the tracks. Never play, walk, bike, hike or jog on or near the MAX, WES or Streetcar tracks.
No camine en las vías del tren. No juegue, camine, ande en bicicleta, ni corra cerca de las vías de trenes MAX, WES o el tranvía Streetcar.



Heads up! Don't be distracted by your phone, iPod or tablet. Stay alert and stay safe.
¡Cuidado! No se distraiga con su teléfono, iPod o tableta. Manténgase alerta y cuide su seguridad.




Stop, look and listen before crossing the street or train tracks. Obey all signs and signals.
Mire hacia ambos lados. Pare, mire y escuche antes de cruzar la calle o las vías del tren. Obedezca todos los letreros y señales.




Riding at night? Wear light-colored or reflective clothing and carry a cell phone, flashlight or safety strobe.
¿Viaja de noche? Use vestimenta clara que refleje la luz y cargue su celular, linterna, o luz reflectora!

FIGURE I-5: BILINGUAL FOR YOUR SAFETY CHANNEL CARD




RULES FOR RIDING


Reglas para el viaje




Valid and correct fare is required.
Se requiere boleto apropiado y válido.




In the priority seating area, move for seniors and people with disabilities.
En el área de prioridad, ceda le asiento a personas de edad avanzada y personas con discapacidad.




Don't threaten or intimidate riders or operators.
No amenace ni intimide a otros pasajeros ni al conductor.




Don't be so loud that you disturb others.
No haga ruidos que molesten a los demás.



Don't block the aisles or doors.
No bloquee los pasillos o puertas.



Unless it's a service animal, your pet must be kept in a carrier.
Su mascota debe viajar en una jaula a menos que sea un animal de servicio.



No eating on board, but you can bring food or drinks in closed containers.
No se permite comer a bordo. Puede transportar comida o bebidas en recipientes cerrados.

MAXIMUM PENALTY: \$250/EXCLUSION • TMC 28-29

FIGURE I-6: BILINGUAL RULES FOR RIDING CHANNEL CARD



English • Español • Tiếng Việt • Русский
中文 • عربي • Română • 한국어 • 日本語
Tagalog • 𑌆𑌇𑌃 • Somali • Українськи • فارسی

Fares and how to ride
Tarifas y cómo viajar
Giá vé & cách đi xe Bus, MAX
Плата за проезд и как пользоваться
票价以及如何乘车
قيمة التذاكر و دليل المواصلات
Prețul călătoriei și cum să folosiți sistemul de transport
요금과 탑승 방법
料金と乗車方法
Pamasahe at kung paano sumakay
ឥសាន្ត្រាប្រយោជន៍ និងរបៀបជិះយានជំនិះ
Noolka iyo sida loo raaco
Плата за проїзд та як користуватися
عنوان جلد چگونگی استفاده از وسایل نقلیه


 Effective
Sept. 2, 2018

FIGURE I-7: MULTILINGUAL HOW TO RIDE BROCHURE

SUBRECIPIENT MONITORING

To provide subrecipients of federal funds assistance and information to ensure continued compliance with all grant requirements, TriMet conducts three levels of subrecipient monitoring: project oversight, assessments and ongoing assistance.

Project Oversight

TriMet's *Subrecipient Monitoring Procedures* outlines programmatic and fiscal responsibilities of various roles to ensure subrecipients are complying with federal requirements and are using federal funds appropriately. Oversight begins after grant applications are awarded by the federal agency and a specific accounting code is assigned by the Senior Financial Analyst, all the way through close out of the grant.

Project managers, who are ultimately responsible for the achievement of subrecipient outcomes, are involved in every step of the process by: ensuring appropriate agreements are in place, agreements contain the required federal, state and local language and verifying that performance measures and all compliance requirements are met throughout the grant period.

Assessments

In consultation with the Title VI and Equity Programs Administrator, the Grant Administrator performs audit assessments of subrecipients by conducting annual compliance reviews, which includes reviewing external annual audits, monthly/quarterly performance reports and Title VI plans and other documents. If results of assessments identify known or potential concerns, the Grant Administrator may conduct additional procedures such as testing payments, site audits to gain an understanding of internal controls and ensuring federal requirements are met such as procurement, equipment purchases, prevailing wages, match and suspension and debarment, when applicable.

Further, the Title VI and Equity Programs Administrator and Grant Administrator monitors and provides feedback and training to subrecipients as well as Project Managers on federal compliance requirements.

TriMet's Internal Audit Department also serves as a resource to management in providing special reviews of financial, operational and/or regulatory compliance. Upon request, Internal Audit can review selected programs and assist staff with recommendations by providing independent and objective consulting services.

Ongoing Assistance

The Project Manager, Title VI and Equity Programs Administrator, and/or the Grant Administrator provide ongoing assistance to subrecipients through communications, trainings (when requested), and access to subject matter experts within TriMet for information and data. Specifically, TriMet has provided the following to subrecipients:

- Demographic data to update their Title VI public participation and language assistance plans; and
- Procurement reviews to ensure federal requirements are met.

Subrecipient Title VI Program Review

As a designated recipient of FTA funds, TriMet receives, administers and allocates funds to subrecipients and is responsible for documenting compliance with Title VI. TriMet's responsibilities include monitoring subrecipient compliance with Title VI, collecting and reviewing Title VI documents, including subrecipient Title VI data to FTA and providing assistance and support to subrecipients.

From the Title VI Circular

In the case in which a primary recipient extends federal financial assistance to any other recipient, such other recipient shall also submit such compliance reports to the primary recipient as may be necessary to enable the primary recipient to carry out its obligations under this part.

TriMet developed the *Subrecipient's Guide to Title VI Compliance and Title VI Compliance Template* (Attachment G) to help subrecipients understand the federal requirements. If a subrecipient is not in compliance with Title VI regulations, TriMet will work with the subrecipient to ensure compliance, which includes providing data, information, guidance and support for the development and formal adoption of the subrecipient Title VI program components.

To monitor Title VI compliance, TriMet:

- Documents subrecipient compliance with the general requirements;
- Collects and maintains subrecipient Title VI program documents on a designated schedule; and
- Forwards subrecipient Title VI information to the FTA, if requested.

Subrecipients are made aware of the Title VI program requirements prior to acceptance of grant funds. Subrecipients must submit a Title VI Program to TriMet within a fiscal year of their grant award (grants awarded after September 1, 2016) and every three years after initial submission on August 15th. TriMet reviews all subrecipient Title VI Programs on a triennial basis and also receives and reviews annual reports submitted by August 15th.

BOARD MEMBERSHIP AND RECRUITMENT

TriMet relies on the oversight and guidance from diverse volunteers at every level of the agency's structure. The Board of Directors is comprised of volunteers who represent districts spanning the diversity of the agency's service district and are nominated by the Governor and confirmed by the Oregon State Senate. To provide ongoing feedback on Transit Equity and Accessibility for Seniors/People with Disabilities, the General Manager and Board seek guidance from two additional committees: the Transit Equity Advisory Committee (TEAC) and the Committee on Accessible Transportation (CAT). Members at each level are recruited to provide diverse perspectives necessary for holistic decision-making. Board membership is presented in Table I-5: TriMet board membership by race/ethnicity below.

TABLE I-5: TriMET BOARD MEMBERSHIP BY RACE/ETHNICITY

Body	# of Members	White*	Hispanic	Black*	Asian*	Native American*	Hawaiian Native and Pacific Islander*	Other*
Population	1,590,996	70.8%	12.6%	3.5%	7.8%	0.5%	0.5%	4.3%
Board of Directors	7	43%	14%	29%	14%	0%	0%	0%
Finance & Audit Committee	3	67%	0%	33%	0%	0%	0%	0%
Transit Equity Advisory Committee	18	22%	28%	17%	17%	0%	0%	17%
Committee on Accessible Transportation	14	100%	0%	0%	0%	0%	0%	0%

*Non-Hispanic

Board and Committee Recruitment

TriMet's Board of Directors is made up of seven members appointed by the Governor of Oregon. There is currently one vacant spot on the Board. Board members represent, and must live in, certain geographical districts. The Board sets agency policy, enacts legislation (taxing and ordinances relating to policy ordinances) and reviews certain contracts. Recruitment and appointment is done through the Governor's Executive Appointments Office.

The **Finance & Audit Committee** is made up of three Board members. The Committee assists the Board of Directors with oversight of TriMet's financial strategy and objectives, the integrity of TriMet's financial statements, the independent auditor's qualifications and independence, and TriMet's enterprise risk issues, programs, management practices and initiatives to ensure that systems and risk management tools are in place and functioning effectively. The Committee has an adopted

charter, and an annually adopted work plan. The TriMet Board President appoints Board members to the Finance & Audit Committee.

The **Transit Equity Advisory Committee (TEAC)** was organized in early May 2013 to extend the agency's outreach and involvement to transit dependent riders, as well as serve as a link to community organizations. TEAC also provides direction on the agency's transit equity strategy. The panel provides input and guidance on equity issues related to Title VI and Environmental Justice analysis, service planning, operational and capital investments, improving service to transit dependent riders, and disseminating information about transportation services to community-based organizations, social service agencies and community at large. Committee membership is appointed by the General Manager and currently consists of a 18-member panel (representing 18 community organizations) with one TriMet Board Member.

The **Committee on Accessible Transportation (CAT)** was formed in 1985 to advise the TriMet Board of Directors and staff on plans, policies and programs for seniors and people with disabilities. CAT has 15 community members: eight seniors and/or people with disabilities who use TriMet, six representatives of seniors and/or people with disabilities, as well as one member of the TriMet Board of Directors. All CAT members are appointed by the General Manager for a two-year term. Membership recruitment process outreach includes: 1) general notification to service agencies and organizations that serve seniors and/or people with disabilities of all races; 2) general notification to mailing list of individuals/organizations who have expressed interest in the Committee's activities; 3) specific contacts from current committee members to individuals who may be interested in serving on the Committee; and 4) placement of recruitment notice in the "Public Notice" section of local newspaper.

FACILITIES SITING AND CONSTRUCTION

Since the last Title VI Program submission in 2016, TriMet has selected a site for one facility meeting the applicable definitions under Title VI, and thereby requiring an equity analysis with subsequent TriMet board's consideration, awareness, and approval (provided as Attachment H). TriMet's process for conducting equity analyses related to facility siting and construction follows the guidance provided in the Circular/Title 49 CFR and included below.

Currently, Title 49 CFR Section 21.9(b)(3) states,

In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part.

Title 49 CFR part 21, Appendix C, Section (3)(iv) provides,

The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin.

According to FTA Circular 4702.1B in order to comply with the regulations when constructing storage facilities, maintenance facilities, or operations centers.

1. Complete a Title VI equity analysis during the planning stage with regard to where a project is located or sited to ensure the location is selected without regard to race, color, or national origin. Recipients shall engage in outreach to persons potentially impacted by the siting of facilities. The Title VI equity analysis must compare the equity impacts of various siting alternatives, and the analysis must occur before the selection of the preferred site.
2. When evaluating locations of facilities, recipients should give attention to other facilities with similar impacts in the area to determine if any cumulative adverse impacts might result. Analysis should be done at the Census tract or block group where appropriate to ensure that proper perspective is given to localized impacts.
3. If the recipient determines that the location of the project will result in a Disparate Impact on the basis of race, color, or national origin, the recipient may only locate the project in that location if there is a substantial legitimate justification for locating the project there, and where there are no alternative locations that would have a less Disparate Impact on the basis of race, color, or national origin. The recipient must show how both tests are met; it is important to understand that in order to make this showing, the recipient must consider and analyze alternatives to determine whether those alternatives would have less of a Disparate Impact on the basis of race, color, or national origin, and then implement the least discriminatory alternative.

MAJOR SERVICE AND FARE CHANGE EQUITY ANALYSES

TriMet considers possible equity impacts in developing potential service and fare changes, and evaluates proposals for Major Service Changes and any fare changes for potential adverse effects, Disparate Impacts, and/or Disproportionate Burdens.

Since the time of the last Title VI Program submittal TriMet has implemented several improvements to service and changes to fares. The five reports noted below cover the equity analyses of all Major Service Changes and all fare changes implemented since September 2016, and are provided as Attachments I – M, along with corresponding documentation of the TriMet board’s consideration, awareness, and approval of each.

- **Ordinance No. 345: FY2018 Annual Service Plan Equity Analysis;** April 5, 2017
 - Board approval at April 26, 2017 business meeting

- **Ordinance No. 347: Low-Income Fare Equity Analysis;** November 30, 2017
 - Board approval at January 24, 2018 business meeting

- **Ordinance No. 350: FY2019 Annual Service Plan Equity Analysis;** April 9, 2018
 - Board approval at April 25, 2018 business meeting

- **Ordinance No. 353: FY2020 Annual Service Plan Equity Analysis;** April 8, 2019
 - Board approval at April 24, 2019 business meeting

- **Ordinance No. 354: 30-Day Pass Elimination Equity Analysis;** March 15, 2018
 - Board approval at May 15, 2019 business meeting

Part II: Title VI Policies

This section provides the following policies and standards, as approved by the TriMet board:

1. Major Service Change Policy
2. Disparate Impact Policy
3. Disproportionate Burden Policy
4. System-wide Service Standards
5. System-wide Service Policies

Policies on Major Service Change, Disparate Impact, and Disproportionate Burden have been shared for public information, awareness, and comment. They were informed by staff presenting at several community meetings (both English and Spanish), a dedicated website⁵, and a questionnaire sent to community service providers in spring and summer 2019, as well as feedback gathered since TriMet's last submittal in 2016. Information about the Title VI process, complaint procedures, and the proposed standards and policies have been made available via the TriMet website as well by calling the customer service phone number or emailing a dedicated email address.

MAJOR SERVICE CHANGE POLICY

All changes in service meeting the definition of "Major Service Change" are subject to a Title VI Equity Analysis prior to Board approval of the service change. A Title VI Equity Analysis will be completed for all Major Service Changes and will be presented to the TriMet Board of Directors for its awareness, consideration and included in the subsequent TriMet Title VI Program report with a record of action taken by the Board.

TriMet defines a Major Service Change as:

1. A change to 15% or more of a line's route miles. This includes routing changes where route miles are neither increased nor reduced (i.e. re-routes), or;
2. A change of 15% or more to a line's span (hours) of service on a daily basis for the day of the week for which a change is made, or;
3. A change of 15% or more to a line's frequency of service on a daily basis for the day of the week for which a change is made, or;
4. A single transit route is split into two or more transit routes.
5. A new transit route is established as defined in the Introduction.
6. A transit route is eliminated or retired from service.

⁵ <https://trimet.org/equity/title6update>

A Major Service Change occurs whether the above thresholds are met:

- a) Within a single service proposal, or;
- b) Due to a cumulative effect of routing, span, or frequency changes over the three years prior to the analysis.

The following service changes are exempted:

1. Standard seasonal variations in service are not considered Major Service Changes.
2. In an emergency situation, a service change may be implemented immediately without an equity analysis being completed. An equity analysis will be completed if the emergency change is to be in effect for more than 180 days and if the change(s) meet the definition of a Major Service Change. Examples of emergency service changes include but are not limited to those made because of a power failure for a fixed guideway system, the collapse of a bridge over which bus or rail lines pass, major road or rail construction, or inadequate supplies of fuel.
3. Experimental service changes may be instituted for 180 days or less without an equity analysis being completed. An equity analysis will be completed prior to continuation of service beyond the experimental period if the change(s) meet the definition of a Major Service Change.

Public Participation and Board Approval

The strategy TriMet employed to inform the Major Service Change threshold in 2016 was asking community members and non-profit service providers to describe a change in the recent past from which they or the clients they serve felt the impacts (either positive or negative). The idea to lower the Major Service Change threshold to 15 percent (previously 25 percent) arose from community feedback that even relatively small service changes can have significant impacts on those who rely most on TriMet to meet their transportation needs.

In 2019, staff proposed adding the following “a transit route is eliminated or retired from service” to its Major Service Change policy. Although TriMet’s current policy is one of the most sensitive across transit agencies, this change will make the way TriMet handles major service changes an industry standard. It will also help to make the designation easier for internal staff and the public to understand. To inform the policy change, staff sought out feedback from the Transit Equity Advisory Committee and a dedicated web page.

DISPARATE IMPACT POLICY

The Disparate Impact Policy establishes a threshold for determining whether a given action has a potential Disparate Impact on minority populations.

In the course of performing a Title VI equity analysis for possible Disparate Impact, TriMet will analyze how the proposed Major Service Change or fare change action could impact minority populations, as compared to non-minority populations.

In the event the proposed action has an adverse impact that affects minority populations more than

Disparate Impact refers to a facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin...

From the Title VI Circular

The [Disparate Impact] policy shall establish a threshold for determining when adverse effects of fare/service changes are borne disproportionately by minority populations. The Disparate Impact threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by minority populations compared to impacts borne by non-minority populations. The Disparate Impact threshold must be applied uniformly... and cannot be altered until the next Title VI Program submission.

non-minority populations at a level that exceeds the thresholds established in the adopted Disparate Impact Policy, or that restricts the benefits of the service change to protected populations, the finding would be considered as a potential Disparate Impact. Given a potential Disparate Impact, TriMet will evaluate whether there is an alternative that would serve the same objectives and with a more equitable impact. Otherwise, TriMet will take measures to minimize or mitigate the adverse impact of the proposed action.

The Disparate Impact Policy defines measures for determination of potential Disparate Impact on minority populations resulting from Major Service Changes or any change in fares. The policy is applied to both adverse effects and benefits of Major Service Changes. Adverse effects of service changes are defined as:

1. A decrease in the level of transit service (hours, days, and/or frequency); and/or
2. Decreased access to comparable transit service, which is defined as an increase of the access distance to beyond one-quarter mile of bus stops or one-half mile of rail stations.

The determination of Disparate Impact associated with service changes is defined separately for impacts of changes on individual line, and for system-level impacts of changes on more than one line, as well as for both service reductions and service improvements:

1. In the event of potential adverse effects resulting from service reductions:

- a) A Major Service Change to a *single line* will be considered to have a potential Disparate Impact if the percentage of impacted minority population in the service area of the line exceeds the percentage of minority population of the TriMet District as a whole by at least 3 percentage points (e.g., 32 percent compared to 29 percent).
- b) To determine the *system-wide* impacts of Major Service Change reductions on more than one line, the percentage of the TriMet district's minority population that is impacted is compared to the percentage of the TriMet district's non-minority population that is impacted. If the percentage of the minority population impacted is at least 20 percent greater than the percentage of the non-minority population impacted (e.g., 12 percent compared to 10 percent), the overall impact of changes will be considered disparate.

2. In the event of service improvements:

- a) A major service change to a *single line* will be considered to have a potential Disparate Impact if:
 - i. The improvement is linked to other service changes that have disproportionate and adverse effects on minority populations, or;
 - ii. The percentage of impacted minority population in the service area of the line is less than the percentage of minority population of the TriMet District as a whole by at least 3 percentage points (e.g., 26 percent compared to 29 percent).
- b) To determine the *system-wide* impacts of major service change improvements on more than one line, the percentage of the TriMet district's minority population that is impacted is compared to the percentage of the TriMet district's non-minority population that is impacted. If the percentage of the minority population impacted is at least 20 percent less than the percentage of the non-minority population impacted (e.g., 8 percent compared to 10 percent), the overall impact of changes will be considered disparate.

3. Additional considerations to complement the quantitative Disparate Impact analysis above may include evaluating impacts to accessing employment, education, food, health care, or public parks/recreation for minority populations.

Upon determination of Disparate Impact, TriMet will either:

- a) Alter the service proposal to avoid, minimize, or mitigate potential Disparate Impacts, or;

- b) Provide a substantial legitimate justification for keeping the proposal as-is, and show that there are no alternatives that would have a less Disparate Impact on minority riders but would still accomplish the project or program goals.

Fare Changes

For fare changes, a potential disparate impact is noted when the percentage of trips by minority riders using a fare option, in combination with the percentage price change for that option, has an impact that exceeds the comparable impact on non-minority riders. When minority populations or riders will experience a 10% (or more) greater adverse effect than that borne by the non-minority populations or riders, such changes will be considered to have a disparate impact. Where potential adverse impacts are identified, TriMet will provide a meaningful opportunity for public comment on any proposed mitigation measures, including any less discriminatory alternatives that may be available.

Differences in the use of fare options between minority populations and non-minority populations include all such differences that are documented as statistically significant at the 95 percent confidence level.

Public Participation and Board Approval

Feedback on this Program and the policies therein generally did not differ between how TriMet should treat analysis of disparities based on race (Disparate Impact) and income (Disproportionate Burden). Thus, the two policies remain equivalent.

In 2019, TriMet sent a questionnaire to staff at the 103 organizations participating in the agency's Access Transit fare program for low-income transit riders (see Attachment P). The questionnaire asked about Title VI program awareness, observations of changes to service or fares that have had a significant impact on clients served, thoughts on what else should be considered when making service changes, and examples of evaluating policies for potential disproportionate impacts to low-income persons and/or persons of color.

After reviewing survey responses, TriMet decided to expand its access considerations list to include parks, public recreation, and green spaces when performing an equity analysis. Moreover, participants supported the former population-based approach (i.e., looking at the low-income and minority population living by transit lines proposed for changes was a good way to measure potential impacts) as well as the inclusion of access to jobs, education, food and health care when conducting equity analysis.

The process to choose the 10 percent threshold for the Disparate Impact policy for fare changes started with researching policies from 15 comparable transit agencies and consulting with over 50 Title VI staff leads from FTA Region 9 and 10 transit agencies. The research found a range of thresholds from 5 percent to 35 percent. TriMet staff consulted with the Transit Equity Advisory Committee (April 9, 2019 and July 9, 2019) on what percentage would establish a high standard for identifying differential impacts in the event of fare changes. The feedback received noted that a percentage under 12% would be a good starting point and should serve as a baseline. Additional comments included that the policy should state that TriMet will work to minimize any potential impacts on minority populations for all fare changes. After considering this input and how it would impact the equity analysis process going

forward, TriMet opted to establish a lower threshold (10%) for fare changes. TriMet also opted to not include major and minor fare change definitions given the minimal support from TEAC and community partners.

DISPROPORTIONATE BURDEN POLICY

The Disproportionate Burden Policy establishes a threshold for determining whether a given action has a potential Disproportionate Burden on low-income populations.

In the course of performing a Title VI equity analysis for possible Disproportionate Burden, TriMet will analyze how the proposed Major Service Change or fare change action could impact low-income populations, as compared to non-low-income populations.

From the Title VI Circular

The [Disproportionate Burden] policy shall establish a threshold for determining when adverse effects of fare/ service changes are borne disproportionately by low-income populations. The disproportionate burden threshold defines statistically significant disparity and may be presented as a statistical percentage of impacts borne by low-income populations as compared to impacts born by non-low-income populations.... The disproportionate burden threshold must be applied uniformly... and cannot be altered until the next [Title VI] program submission....

In the event the proposed action has an adverse impact that affects low-income populations more than non-low-income populations at a level that exceeds the thresholds established in the adopted Disproportionate Burden Policy, or that restricts the benefits of the service change to protected populations, the finding would be considered as a potential Disproportionate Burden. Given a potential Disproportionate Burden, TriMet will evaluate whether there is an alternative that would serve the same objectives and with a more equitable impact. Otherwise, TriMet will take measures to minimize or mitigate the adverse impact of the proposed action.

The Disproportionate Burden Policy defines measures for determination of potential Disproportionate Burden on low-income populations resulting from Major Service Changes or any change in fares. The policy is applied to both adverse effects and benefits of Major Service Changes. Adverse effects of service changes are defined as:

1. A decrease in the level of transit service (hours, days, and/or frequency); and/or
2. Decreased access to comparable transit service, which is defined as an increase of the access distance to beyond one-quarter mile of bus stops or one-half mile of rail stations.

The determination of Disproportionate Burden associated with service changes is defined separately for impacts of changes on individual line, and for system-level impacts of changes on more than one line, as well as for both service reductions and service improvements:

1. In the event of potential adverse effects resulting from service reductions:
 - a) A Major Service Change to a *single line* will be considered to have a potential Disproportionate Burden if the percentage of impacted low-income population in the service area of the line exceeds the percentage of low-income population of the TriMet District as a whole by at least 3 percentage points (e.g., 31 percent compared to 28 percent).
 - b) To determine the *system-wide* impacts of Major Service Change reductions on more than one line, the percentage of the TriMet district's low-income population that is impacted is compared to the percentage of the TriMet district's non-low-income population that is impacted. If the percentage of the low-income population impacted is at least 20 percent greater than the percentage of the non-low-income population impacted (e.g., 12 percent compared to 10 percent), the overall impact of changes will be considered disparate.
2. In the event of service improvements:
 - c) A major service change to a *single line* will be considered to have a potential Disproportionate Burden if:
 - iii. The improvement is linked to other service changes that have disproportionate and adverse effects on low-income populations, or;
 - iv. The percentage of impacted low-income population in the service area of the line is less than the percentage of low-income population of the TriMet District as a whole by at least 3 percentage points (e.g., 25 percent compared to 28 percent).
 - d) To determine the *system-wide* impacts of major service change improvements on more than one line, the percentage of the TriMet district's low-income population that is impacted is compared to the percentage of the TriMet district's non-low-income population that is impacted. If the percentage of the low-income population impacted is at least 20 percent less than the percentage of the non-low-income population impacted (e.g., 8 percent compared to 10 percent), the overall impact of changes will be considered disparate.
3. Additional considerations to complement the quantitative Disproportionate Burden analysis above may include evaluating impacts to accessing employment, education, or health care for low-income populations.

Upon determination of Disproportionate Burden, TriMet will either:

- c) Alter the service proposal to avoid, minimize, or mitigate potential Disproportionate Burdens, or;

- d) Provide a substantial legitimate justification for keeping the proposal as-is, and show that there are no alternatives that would have a less Disproportionate Burden on low-income riders but would still accomplish the project or program goals.

Fare Changes

For fare changes, a potential disparate impact is noted when the percentage of trips by low-income riders using a fare option, in combination with the percentage price change for that option, has an impact that exceeds the comparable impact on higher income riders. When low-income populations or riders will experience a 10% (or more) greater adverse effect than that borne by the higher income populations or riders, such changes will be considered to have a disparate impact. Where potential adverse impacts are identified, TriMet will provide a meaningful opportunity for public comment on any proposed mitigation measures, including any less discriminatory alternatives that may be available.

Differences in the use of fare options between low-income populations and higher income populations include all such differences that are documented as statistically significant at the 95 percent confidence level.

Public Participation and Board Approval

Feedback on this Program and the policies therein generally did not differ between how TriMet should treat analysis of disparities based on race (Disparate Impact) and income (Disproportionate Burden). Thus, the two policies remain equivalent.

In 2019, TriMet sent a questionnaire to staff at the 103 organizations participating in the agency's Access Transit fare program for low-income transit riders (see Attachment P). The questionnaire asked about Title VI program awareness, observations of changes to service or fares that have had a significant impact on clients served, thoughts on what else should be considered when making service changes, and examples of evaluating policies for potential disproportionate impacts to low-income persons and/or persons of color.

After reviewing survey responses, TriMet decided to expand its access considerations list to include parks, public recreation, and green spaces when performing an equity analysis. Moreover, participants supported the former population-based approach (i.e., looking at the low-income and minority population living by transit lines proposed for changes was a good way to measure potential impacts) as well as the inclusion of access to jobs, education, food and health care when conducting equity analysis.

The process to choose the 10 percent threshold for the Disproportionate Burden policy for fare changes started with researching policies from 15 comparable transit agencies and consulting with over 50 Title VI staff leads from FTA Region 9 and 10 transit agencies. The research found a range of thresholds from 5 percent to 35 percent. TriMet staff consulted with the Transit Equity Advisory Committee (April 9, 2019 and July 9, 2019) on what percentage would establish a high standard for identifying differential impacts in the event of fare changes. The feedback received noted that a percentage under 12% would be a good starting point and should serve as a baseline. Additional comments included that the policy should state that TriMet will work to minimize any potential impacts on low-

income populations for all fare changes. After considering this input and how it would impact the equity analysis process going forward, TriMet opted to establish a lower threshold (10%) for fare changes. TriMet also opted to not include major and minor fare change definitions given the minimal support from TEAC and community partners.

Part III: System-Wide Service Policies and Standards

In December 2014, the TriMet Board adopted the following five priority considerations for service planning decision-making (Attachment N provides TriMet's full Service Guidelines Policy):

- Equity
- Demand
- Productivity
- Connections
- Growth

These considerations guide how TriMet identifies and executes service changes, and are incorporated into each year's Annual Service Plan.

Beyond these priority considerations, TriMet has also established standards and policies as set forward in FTA Circular 4702.1B covering:

Standards: Vehicle Loads
 Service Frequency
 On-Time Performance
 Service Availability

Policies: Distribution of Amenities
 Vehicle Assignment

These standards and policies assist in guiding the development and delivery of service in support of TriMet's mission to provide valued transit service that is safe, dependable, and easy to use. They also provide benchmarks to ensure that service design and operations practices do not result in discrimination on the basis of race, color, or national origin. They establish a basis for monitoring and analysis of service delivery, availability, and the distribution of amenities and vehicles to determine whether or not any Disparate Impacts are evident.

Each standard and policy is described, following. Please refer to Part IV: Service Monitoring for a description of the current analysis of performance/outcomes for each respective standard and policy, comparing the service and amenities provided for minority and non-minority populations respectively, and the conclusions in regard to any Disparate Impacts.

STANDARD – VEHICLE LOADS

Standards for passenger capacity are used to determine if a bus or train is overcrowded. Table III- III-1 shows passenger capacities for buses, light rail cars, and commuter rail cars as the average

maximum numbers of persons seated and standing during the peak one-hour in the peak direction. Maximum load factors represent the maximum achievable capacity, and are calculated by dividing the total capacity by the seated capacity of the vehicle.

Vehicle passenger load is measured by the average load and the ratio of average load to seated capacity (load/seat ratio) during weekday a.m. peak, midday, and p.m. peak periods, respectively. Maximum load factors should not be exceeded during any period, including a.m. and p.m. peak periods on weekdays when highest passenger loads are typically experienced.

Bus and MAX loads are monitored using automatic passenger counters linked to vehicle location technology. WES passenger counts are taken by a train crew member.

TABLE III-1: VEHICLE CAPACITIES BY MODE AND TYPE

Vehicle Type	Passenger Capacities			
	Seated	Standing	Maximum Achievable Capacity	Maximum Load Factor
30-ft. Bus	28	2	30	1.1
40-ft. Bus	39	12	51	1.3
MAX Light Rail 2-Car Train	128	138	266	2.1
WES Commuter Rail - 1 Car Train	70	0	70	1.0
WES Commuter Rail - 2 Car Train	146	0	146	1.0

Notes: All MAX operates as 2-car trains. WES may operate as a single-car or a 2-car train.

STANDARD – SERVICE FREQUENCY

Vehicle headway is the measurement of the frequency of service and is the scheduled time between two vehicles traveling in the same direction on the same line at a given location.

TriMet headway standards for lines designated as “frequent service” is that these lines should operate 15-minute or better service for most of the day, seven days a week.

In 2003 TriMet worked with stakeholders and adopted criteria to guide the expansion of frequent service. The most important factor in the criteria is potential ridership, but another consideration is the density of transit-dependent population as measured by proportion of low-income residents, seniors, or persons with disabilities. To meet the criteria for frequent service, a line must be projected to generate high ridership and serve areas with high employment/population density; areas with streets that are friendly to pedestrians and transit service; areas with a high proportion of transit

dependent population and activities, and areas that meet other criteria specified in TriMet's Service Guidelines Framework.

Fifteen bus lines and all five MAX lines are considered frequent service. TriMet has not adopted headway standards for lines that do not meet the criteria for frequent service; however, at minimum lines should operate with headways of no more than 60 minutes during weekday peak periods.

Due to budget constraints resulting from the Great Recession, beginning in 2009 TriMet was forced to reduce service on most frequent service bus and MAX lines during off-peak hours and on weekends. However, because TriMet made a commitment to prioritize the restoration of frequent service once resources were available, the agency has now fully restored this service to 15 minutes or better, most of the day, every day.

Given that MAX lines and frequent service bus lines are designed and operated to serve maximum ridership, these lines also serve above-average shares of minority and poverty populations. Frequent service bus lines and all MAX lines taken together serve 48 percent of the population of the TriMet Service District (about 720,000 of a total of 1.5 million). Among populations served by frequent service, 55 percent are minority and 65 percent are low-income as defined by TriMet. These shares are greater than the overall minority (29 percent) and low-income (22 percent) population in the TriMet District.

STANDARD – ON-TIME PERFORMANCE

TriMet has established measures and standards for on-time performance of bus, MAX light rail and WES commuter rail service. For bus and MAX service, on-time is defined as vehicle arrivals no more than one minute before to five minutes after scheduled time at all points. TriMet's on-time performance objective is 90 percent or greater. TriMet continuously monitors for on-time performance and system results are included as part of monthly performance reports covering all aspects of operations. For WES commuter rail, train arrivals at the respective end-of-line stations are noted and all arrivals no more than four minutes before or after the scheduled time are considered as on-time.

STANDARD – SERVICE AVAILABILITY

TriMet's standard for availability of service is that persons residing within one-half mile of bus stops and/or rail stations are considered served. Service availability is expressed as number and percentage of District-wide population and is determined by mode; for bus, MAX, and WES respectively. The calculation of distance is based on March 2018 stop locations and the residential address points within a half-mile buffer around stops. There is no absolute standard for service availability; however the expectation in the context of Title VI is that the share of minority population within the TriMet District with service available should be no less than the share of non-minority populations with service available.

AMENITY PLACEMENT GUIDELINES

TriMet has written guidelines that form a framework for the deployment of amenities as part of its projects and programs. The following sections briefly summarize the major policy documents that govern the deployment of amenities on TriMet transit system. Note that the use of the term amenities

is limited to the Title VI definition for the purposes of this document. This section is generally organized by mode, but also includes a summary of customer information deployment policy. It should also be noted that project development often requires a scope of deliberation regarding amenities placement to include considerations not accounted for in these written policies.

Bus Stop Classification Guidelines

It is important that bus stops are easily identifiable, safe, accessible and a comfortable place to wait for the bus. TriMet’s Bus Stop Classification Guidelines (Table III-2) identify elements of the TriMet bus stop, set guidelines for the design of bus stops and the placement of bus stop amenities, and describe the process for managing and developing bus stops.






Stop Type	Illustration	Externally Managed Features	Potential Bus Stop Features	Stop Conditions & Usage
Under-Developed		No clear pedestrian access; no logical, safe street crossing; constrained topography	No pavement; inadequate shoulder; visibility blocked; poor lighting; insufficient ADA clearances; exposure to weather/traffic; shared pole	Poor, or lack of, supporting land uses; few or no boarding rides; closely spaced with another stop
Basic		Legal street crossing (corner ramps); sidewalk or safe shoulder access	Pavement meets ADA clearances; most bus stop signs on dedicated poles; free standing bench	All stops meeting siting criteria
Level 1		<i>Preceding features plus:</i> sidewalk connections; curb extensions; crosswalks	<i>Preceding features plus:</i> Standard (A or B) shelter (larger if justified); shelter lighting; rear door landing when physically possible	High use stops (50+ Ons/day); significant employer program participant; apartments; institutions; hospitals; shopping centers; major business; stops with significant usage by riders who are disabled or elderly
Level 2		<i>Preceding features plus:</i> transit plazas and active public space	<i>Preceding features plus:</i> double B or higher capacity shelter; printed schedule; trash can; additional free standing bench	Major stops (150+ Ons/day); transfer points; stops with significant bus ramp usage
Level 3		<i>Preceding features plus:</i> concession or nearby shop(s); landscaping; robust public and pedestrian infrastructure	<i>Preceding features plus:</i> high capacity shelter; free standing bench(s); bike storage lockers; artwork elements	High Capacity Stops (250+ Ons/day) Bus Rapid Transit service; transit centers; major transfer hubs; transit mall

TABLE III-2: BUS STOP CLASSIFICATION GUIDELINES - 2018

LIGHT RAIL (“MAX”) STATION DESIGN

TriMet’s Design Criteria governs the design of light rail projects including requirements for amenities. The following is a summary of the deployment requirements by type of amenity.

Seating – Provide benches on platforms and in bus waiting areas (associated with light rail stations); benches are to be 5’ in length with a mid-armrest

Shelters/canopies – Criteria text does not specifically require the provision of shelters, but practice has been to provide cover at light rail stations. Cover is often provided by one or more stand-alone shelters on the platform, but has also provided by cover mounted to adjacent buildings. Stand-alone

shelters vary in size. Two stand-alone shelters is the most typical practice, but single stand-alone structures and building mounted canopies have also been used.

Escalators – There are no escalators on TriMet’s system. As such there are no specific criteria related to their deployment.

Elevators – Criteria reference the ADA with respect to deployment of elevators. In practice, TriMet seeks to limit deployment of elevators to only those situations where specifically required by ADA and/or necessary because of project constraints, due to security and maintenance concerns.

Trash Cans – Criteria requires deployment of two 33-gallon “waste receptacles” (trash cans) at all light rail station platforms; while no standard product is cited, criteria includes an extensive list of performance characteristics including 20-year life expectancy, low-life cycle cost, high quality design, considering security, and others that in practice result in high quality receptacles being consistently deployed.

COMMUTER RAIL (“WES”) DESIGN

TriMet has one commuter rail line. There is no mode-specific policy guidance exists for amenities associated with commuter rail. In practice, the design of the WES project considered the light rail design criteria and followed them where practical, relevant, and possible in consideration of the other constraints of the project. See Light Rail Station Design, preceding, for a summary.

CUSTOMER INFORMATION

TriMet’s Design Criteria governs the design of light rail projects, is also a key reference for Commuter Rail, and contains the bulk of requirements for customer information items for signage and graphics. TriMet’s Bus Stops Guidelines govern the design of bus stops and contains considerations for customer information. Subsections below summarize typical customer information deployment practices by mode. In addition to these practices, TriMet also considers unique usage factors, transfer locations, service frequency, schedule reliability, special needs, and the specific location of a given stop along a route when identifying placement of customer information amenities.

Bus

Bus catcher information displays (BCIDs): Displays that include route number; route name; direction; route-specific maps; route schedules; stop name; Stop ID numbers for use with TransitTracker™ via phone, text or at trimet.org; and call-to-action. BCIDs are placed at bus stops with minimum boarding rides of 100 per day, at Transit Centers where multiple bus lines converge, as well as rail at some locations.

Variable stop ID signs: Signs include route number; route name; direction; stop name; Stop ID number for use with TransitTracker™ via phone, text or trimet.org; and call-to-action. These signs are located at bus stops where a standard blue bus stop pole and/or shelter unit is unable to be installed due to existing environmental constraints.

Pole-mounted information displays: Displays that include route number; route name; direction; stop name; simple route map; Stop ID number for use with TransitTracker™ via phone, text or trimet.org;

and call-to-action and are placed at all bus stops without BCIDs or variable stop ID signs (complete implementation is expected as of December 2016).

Digital equipment such as electronic real-time arrival displays: Displays are placed along bus routes in complicated transit environments such as high traffic transit centers, the Portland Transit Mall, and private investment partnerships (e.g. Go Lloyd and OHSU).

Light and Commuter Rail

Pylon information displays: Two-side or four-sided displays that include a rail-specific map; route schedules or frequency charts; Stop ID numbers for use with TransitTracker™ via phone, text or trimet.org; and call-to-action. These are placed at all MAX and WES stations.

Digital equipment such as electronic arrival displays next vehicle arrival displays: Displays are placed along rail/fixed guideway stations at all stations built since 2004. A retrofitted installation of displays at stations that currently have no electronic information began in fall 2013, in approximate order of higher to lower ridership. Stations included in the Blue Line Station Rehabilitation Project (from Hollywood/NE 42nd to Cleveland station) that do not already have displays will receive them as part of that project. Some stations have existing environmental constraints that may delay the installation of electronic information.

VEHICLE ASSIGNMENT

Assigning vehicles to routes involves several considerations. Vehicles are domiciled at each of the three bus maintenance facilities (Center, Powell, and Merlo). For buses, ridership is the primary determinant, so those communities with the greatest need for and use of transit generally are served by newer vehicles. TriMet's fleet as of May 2019 includes 702 buses, all of which are low-floor and are equipped with automated stop announcement systems.

Bus assignments also take account of the operating characteristics of buses of various lengths, which are matched to the operating characteristics of the route. Local routes with lower ridership may be assigned 30-foot buses rather than the 40-foot buses. Some routes requiring tight turns on narrow streets are best operated with 30-foot rather than 40-foot buses.

For MAX light rail, vehicles are based at each of the two rail maintenance facilities (Ruby Junction and Elmonica) and are assigned to respective rail lines based on lines served by the facility, daily car availability, and operational efficiency. TriMet's light rail fleet includes 145 train cars of which 119 are low-floor. All cars are equipped with air conditioning, and high-floor cars are always paired with a low-floor car to provide ADA accessibility.

From the Title VI Circular

Vehicle assignment refers to the process by which transit vehicles are placed into service in depots and on routes throughout the transit provider's system. Policies for vehicle assignment may be based on the age of the vehicle, where age would be a proxy for condition. For example, a transit provider could set a policy to assign vehicles to depots so that the age of the vehicles at each depot does not exceed the system-wide average. The policy could also be based on the type of vehicle. For example, a transit provider may set a policy to assign vehicles with more capacity to routes with higher ridership and/or during peak periods. The policy could also be based on the type of service offered. For example, a transit provider may set a policy to assign specific types of vehicles to express or commuter service. Transit providers deploying vehicles equipped with technology designed to reduce emissions could choose to set a policy for how these vehicles will be deployed throughout the service area.

TriMet's WES commuter rail fleet includes three self-powered diesel-multiple units (DMUs) and one "trailer" non-powered car which were built in 2007 and placed in operation with the start of WES service in 2009. Two additional cars (a "married pair") were built in 1952 and 1953 and were placed in operation in 2011.

In regard to assessing the results of TriMet's vehicle assignment practices in the context of Title VI, the policy is that the average age of vehicles on "minority lines" should be no more than the average age of vehicles on "non-minority" lines. Additionally, TriMet has set the expectation that the average age of vehicles on "low-income lines" should be no more than the average age of vehicles on "higher income" lines.

In 2019, TriMet started operating its first completely electric bus serving the Line 62, which is considered a "minority and low-income line". As TriMet looks to phase in all non-diesel buses, the assignment strategy will consider how these vehicles are deployed throughout the service area to ensure equitable distribution.

Part IV: Service Monitoring

Part of TriMet’s compliance with FTA Circular 4702.1B is ongoing performance monitoring across all modes of service (bus, MAX, and WES). This monitoring is meant to ensure that TriMet is providing service in a way that does not discriminate on the basis of race, color, or national origin.

As shown in Figure IV-1, the Title VI equity rating scale rubric ranges from “outstanding”, “good”, “fair”, “marginal” to “adverse impact”. To receive an “outstanding” score, access or service distribution for minority and low-income must be good as or better than non-minority and higher income for each measure. A performance finding within the 5% threshold is considered “good”. The target for TriMet’s Business Plan objective is within 5% or better. A greater than 5% but less than 10% difference equates to “fair”. Above the 10% threshold but within 20% would result in a “marginal” score. A marginal score would be flagged as a caution and area for improvement. Any measure that exceeds 20% would indicate “adverse impact” and would result in a system-wide disparate impact/disproportionate burden finding per the FTA. TriMet will work to improve service and access on an on-going basis to ensure TriMet’s equity targets are achieved and for compliance with TriMet’s Title VI Program.

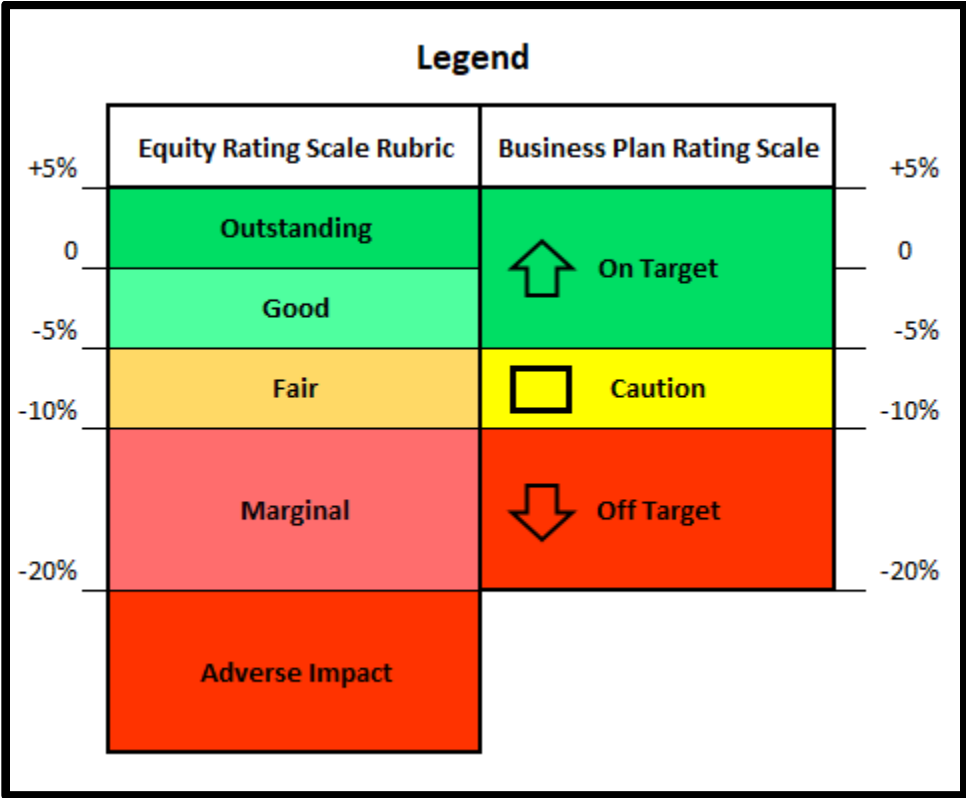


FIGURE IV-1: TITLE VI EQUITY RATING SCALE RUBRIC

TriMet monitors the following service and performance metrics:

1. “Minority” and “Non-minority” lines
2. “Low-income” and “Higher income” lines
3. Service frequency and span
4. On-time performance
5. Vehicle loads
6. Service availability
7. Stop amenities
8. Vehicle assignment

1. MINORITY & NON-MINORITY LINES

“Minority” lines, as defined by the FTA, are lines that provide at least 1/3 of their service (measured by revenue hours) in block groups that are above-average minority population. “Non-minority” lines are all others.

Currently, TriMet operates a total of 89 lines, including 83 bus lines, 5 MAX light rail lines, and 1 WES commuter rail line. Of these, 41 bus lines, 4 MAX lines, WES commuter rail are considered minority lines. The remaining 42 bus lines and 1 MAX line are considered non-minority lines. In the spring 2016 report, WES had been considered a non-minority line, but updated data from the 2012-2016 American Community Survey indicates a change in demographics around station areas to a higher percentage minority population.

As of fall 2018, Minority lines account for 59% of TriMet system service (measured by revenue hours), and 78% of system boarding rides. TriMet generally aligns service with mobility needs and ridership, thus lines serving areas with above-average minority populations typically have higher ridership and therefore a higher overall level of service than non-minority lines.

2. LOW-INCOME & HIGHER INCOME LINES

“Low-income” lines are lines that provide at least 1/2 of their service (measured by revenue hours) in block groups that are above-average low-income population. “Higher income” lines are all others. Forty-one bus lines, 5 MAX lines, and the WES commuter rail are considered low-income lines. The remaining 42 bus lines are considered higher income lines.

3. SERVICE FREQUENCY & SPAN

The analysis of service frequency and span is by mode of service (bus, MAX, WES) and day of service (weekday, Saturday, Sunday). As shown in Tables IV-1 through IV-3 following, the frequency and time span of service is noted for minority and non-minority lines, with comparisons during each time period and for weekday, Saturday, and Sunday.

Findings

1. Weekday service on minority bus lines is more frequent than service on non-minority lines during all time periods with the exception of minority MAX lines during early AM.
 2. Saturday service on minority bus lines is more frequent than service on non-minority lines during all time periods with the exception of minority MAX lines during the day.
 3. Sunday service on minority bus lines is more frequent than service on non-minority lines during all time periods with the exception of minority MAX lines during the night and minority bus lines during early AM.
 4. A higher proportion of minority bus lines operate on Saturday (56 percent) and Sunday (56 percent) than non-minority bus lines on Saturday (52 percent) and Sunday (43 percent). All MAX lines operate on Saturday and Sunday.
 5. The average span of service (hours lines are serving riders from start to end of service) on minority lines exceeds the span of service on non-minority lines for bus and MAX on weekdays and Sundays. The average span of service on non-minority lines exceed the span of service on minority lines for bus and MAX on Saturdays
- Minority lines on average provide more frequent service and span of service compared to non-minority lines. Thus, there are no Disparate Impacts on minority population in regard to frequency or span of service on bus, MAX, or WES.

Table IV-1: Frequency and Span of Service
 Minority and Non-Minority Transit Lines by Mode and Day of Service
 Fall 2018 Service – Weekdays Only

Day of Service	Mode of Service	Line Classification	No. of Lines in Service	% of Week-day Lines in Service	Average Frequency of Service (mins.) ¹						Span of Service (hours) ²
					Early AM	AM Peak	Midday	PM Peak	Evening	Night	
Weekday	<i>Bus</i>	Minority Lines	41	100%	29	30	34	30	29	38	15.3
		Non-Minority Lines	42	100%	31	31	39	34	33	41	14.5
		All Bus lines	83	100%	30	30	36	32	31	39	14.9
	<i>MAX Light Rail</i>	Minority Lines	3	100%	19	12	14	12	14	21	22.2
		Non-Minority Line	2	100%	15	13	15	13	15	21	20.7
		All MAX Lines	5	100%	18	12	14	12	14	21	21.6
	<i>WES Commuter Rail</i>	Non-Minority Line	1	100%	30	30		30	30		9.2
	<i>System</i>	Minority Lines	45	100%	28	28	32	29	28	36	15.6
		Non-Minority Lines	44	100%	30	30	37	33	33	39	14.8
All Lines		89	100%	29	29	35	31	30	37	15.2	

Notes:

¹ Early AM = Start to 6:59 am; AM Peak = 7-8:59 am; Midday = 9 am - 3:59 pm; PM Peak = 4-5:59 pm; Evening = 6-7:59 pm; Night = 8 pm to end of service.

² Span of Service includes only the hours when lines are serving riders. For most lines, this is simply the amount of time from the beginning of the first trip to the end of the last trip. However, some lines have gaps during the middle of the day, so their span is adjusted accordingly.

Table IV-2: Frequency and Span of Service

Minority and Non-Minority Transit Lines by Mode and Day of Service
Fall 2018 Service – Saturday Only

Day of Service	Mode of Service	Line Classification	No. of Lines in Service	% of Weekday Lines in Service	Average Frequency of Service (mins.) ¹				Span of Service (hours) ²
					Early AM	Day	Evening	Night	
Saturday	<i>Bus</i>	Minority Lines	23	56%	40	31	32	39	15.8
		Non-Minority Lines	22	52%	42	33	36	42	17.6
		All bus lines	45	54%	41	32	33	40	16.7
	<i>MAX Light Rail</i>	Minority Lines	3	100%	25	16	15	19	21.5
		Non-Minority Line	2	100%	25	15	15	19	21.8
		All MAX lines	5	100%	25	15	15	19	21.6
	<i>System</i>	Minority Lines	26	58%	37	29	29	36	16.6
		Non-Minority Lines	24	55%	40	32	33	39	17.8
		All lines	50	59%	38	30	31	37	17.2

Notes:

¹ Early AM = Start of service to 7:59 am; Day = 8 am-5:59 pm; Evening = 6-7:59 pm; Night = 8 pm to end of service.

² Span of Service includes only the hours when lines are serving riders. For most lines, this is simply the amount of time from the beginning of the first trip to the end of the last trip. However, some lines have gaps during the middle of the day, so their span is adjusted accordingly.

Table IV-3: Frequency and Span of Service
 Minority and Non-Minority Transit Lines by Mode and Day of Service
 Fall 2018 Service – Sunday Only

Day of Service	Mode of Service	Line Classification	No. of Lines in Service	% of Weekday Lines in Service	Average Frequency of Service (mins.) ¹				Span of Service (hours) ²
					Early AM	Day	Evening	Night	
Weekday	Bus	Minority Lines	23	56%	43	32	33	42	16.9
		Non-Minority Lines	18	43%	41	33	36	45	15.9
		All bus lines	41	49%	42	32	34	43	16.5
	MAX Light Rail	Minority Lines	3	100%	29	16	15	23	22.2
		Non-Minority Line	2	100%	29	16	15	21	20.7
		All MAX lines	5	100%	29	16	15	22	21.6
	System	Minority Lines	26	58%	40	30	31	38	17.5
		Non-Minority Lines	20	44%	38	31	33	41	16.4
		All lines	46	54%	39	30	32	40	17

Notes:

¹ Early AM = Start of service to 7:59 am; Day = 8 am-5:59 pm; Evening = 6-7:59 pm; Night = 8 pm to end of service.

² Span of Service includes only the hours when lines are serving riders. For most lines, this is simply the amount of time from the beginning of the first trip to the end of the last trip. However, some lines have gaps during the middle of the day, so their span is adjusted accordingly.

4. ON-TIME PERFORMANCE

TriMet continuously monitors on-time performance on bus and MAX through CAD-AVL systems, and by direct observation on WES. TriMet defines “on-time” as no more than five minutes late or one minute early. In this analysis, the on-time performance for bus and MAX lines is compared between minority/non-minority and low-income/higher income lines on weekdays, Saturday, and Sunday (Table IV-4 & Table IV-5). WES commuter rail on-time data includes all service, weekdays.

Table IV-4: On-Time Performance
 Minority and Non-Minority Transit Lines by Mode and Day of Service
 Weekday, Saturday, Sunday
 Fall 2018 Service

Mode of Service	Day	Avg. % On-Time (weighted)		Difference; Minority to Non-Minority +/-(-)
		Minority Lines	Non-Minority Lines	
Bus	Weekday	88%	86%	2
	Saturday	89%	88%	1
	Sunday	93%	91%	2
MAX Light Rail	Weekday	90%	92%	(2)
	Saturday	91%	95%	(4)
	Sunday	92%	95%	(3)
WES Commuter Rail	Weekday	97%	n/a	n/a

Notes:

¹For Bus and MAX service, a vehicle is considered “on time” if it departs no more than 1 minute before to 5 minutes after the scheduled time. For WES, trains that arrive at the end-of-line stations (Beaverton Transit Center or Wilsonville) no more than 4 minutes before or after the scheduled time are considered “on time”. Weighted by revenue vehicle hours.

Findings

1. Minority bus lines’ on-time performance is slightly higher than the performance on non-minority bus lines for weekdays, Saturdays, and Sundays.
2. MAX on-time performance for the four minority lines is somewhat lower than the performance of the one non-minority line during weekdays, Saturdays, and Sundays.
3. WES on-time performance is 97 percent.

- While bus on-time performance indicates no Disparate Impact on minority riders, MAX shows slightly lower performance on minority lines because the one non-minority line is the newest in the system. The differences are within the established system-wide Disparate Impact threshold of 20 percent. Nonetheless, TriMet has recently launched a broad initiative to improve on-time performance for the MAX system, which should serve to make all MAX lines more comparable.

Table IV-5: On-Time Performance
 Low-income and Higher Income Transit Lines by Mode and Day of Service
 Weekday, Saturday, Sunday
 Fall 2018 Service

Mode of Service	Day	Avg. % On-Time (weighted)		Difference; Low Income to Higher Income +/-
		Low Income Lines	Higher Income Lines	
Bus	Weekday	87%	87%	0
	Saturday	88%	89%	(1)
	Sunday	92%	91%	1
MAX Light Rail	Weekday	91%	n/a	n/a
	Saturday	93%	n/a	n/a
	Sunday	93%	n/a	n/a
WES Commuter Rail	Weekday	97%	n/a	n/a

Notes:

¹For Bus and MAX service, a vehicle is considered “on time” if it departs no more than 1 minute before to 5 minutes after the scheduled time. For WES, trains that arrive at the end-of-line stations (Beaverton Transit Center or Wilsonville) no more than 4 minutes before or after the scheduled time are considered “on time”. Weighted by revenue vehicle hours.

Findings

1. The on-time performance for Weekdays and Sunday is comparable for both bus lines. OTP for low-income bus lines is slightly lower than higher income bus lines for Saturday.
 2. All MAX lines are considered low-income.
 3. WES on-time performance is 97 percent.
- The average on-time performance for bus, MAX, and WES Commuter Rail indicate no Disproportionate Burden on low-income riders

5. VEHICLE LOADS

Vehicle loads are examined to determine whether buses or trains are overcrowded. Table IV-6 shows vehicle capacities (including both seating & standing), Table IV-7 compares average vehicle loads for minority and non-minority lines during the A.M. Peak, Midday, and P.M. Peak times. Table IV-8 compares vehicle loads for low-income and higher incomes lines for the same times.

TABLE IV-6: VEHICLE CAPACITIES BY MODE AND TYPE

Vehicle Type	Passenger Capacities			
	Seated	Standing	Maximum Achievable Capacity	Maximum Load Factor
30-ft. Bus	28	2	30	1.1
40-ft. Bus	39	12	51	1.3
MAX Light Rail 2-Car	128	138	266	2.1
WES Commuter Rail - 1 Car Train	70	0	70	1.0
WES Commuter Rail - 2 Car Train	146	0	146	1.0

Notes: All MAX operates as 2-car trains. WES may operate as a single-car or a 2-car train.

Table IV-7: Vehicle Loads
Minority and Non-Minority Transit Lines
Fall 2018 Service

Vehicle Type	Time Period	Minority Lines		Non-Minority Lines	
		Load/Seat Ratio	Mean Load	Load/Seat Ratio	Mean Load
Bus (28 or 39 seats)	AM Peak	0.36	15.48	0.41	17.74
	Midday	0.37	14.00	0.39	14.21
	PM Peak	0.47	16.77	0.50	18.10
MAX Light Rail (128 seats)	AM Peak	0.97	124.44	1.01	126.34
	Midday	0.69	89.50	0.50	67.00
	PM Peak	1.15	133.75	0.76	102.62
WES Commuter Rail (146 seats)	AM Peak	0.46	43.00	n/a	n/a
	PM Peak	0.57	58.00	n/a	n/a

¹AM Peak = 7:00 - 8:59 am; Midday = 9:00 am - 3:59 pm; PM Peak = 4:00 - 5:59pm

Findings

1. Average load/seat ratios range from a low of 0.36 to a high of 1.15. While the load-to-seat ratio is above 1.0 for the non-minority MAX line during AM Peak and for minority MAX lines during PM Peak, all modes are below the maximum load factor for every time period and across both minority and non-minority lines.
 2. Minority lines have somewhat smaller loads than non-minority lines across all time periods, with the exception of Midday and PM Peak MAX. Observed loads on both groups of lines are well within the established maximum load factor standards.
- Thus, there is no Disparate Impact on minority population in regard to vehicle loads.

Table IV-8: Vehicle Loads
Low-income and Higher Income Transit Lines
Fall 2018 Service

Vehicle Type	Time Period	Low-Income Lines		Higher Income Lines	
		Load/Seat Ratio	Mean Load	Load/Seat Ratio	Mean Load
Bus (28 or 39 seats)	AM Peak	0.46	19.49	0.33	14.04
	Midday	0.44	16.94	0.33	11.57
	PM Peak	0.57	20.87	0.42	14.38
MAX Light Rail (128 seats)	AM Peak	0.99	125.50	n/a	n/a
	Midday	0.62	80.50	n/a	n/a
	PM Peak	0.99	121.30	n/a	n/a
WES Com-muter Rail (146 seats)	AM Peak	0.46	43.00	n/a	n/a
	PM Peak	0.57	58.00	n/a	n/a

Findings

1. Average load/seat ratios range from a low of 0.44 to a high of 0.99.
 2. Low-income lines have somewhat larger loads than higher income lines across all time periods. Observed loads on both groups of lines are well within the established maximum load factor standards.
- Thus, there is no Disproportionate Burden on low-income populations in regard to vehicle loads.

6. SERVICE AVAILABILITY

TriMet considers persons residing within one-half mile of bus stops and/or rail stations as having service available. Service availability is expressed as number and percentage of District-wide population and is determined by mode; for bus, MAX, and WES respectively. Table IV-9 on the next page presents the availability of service by mode for Fall 2018 service.

Findings

1. The percent of minority population with service available exceeds that of the non-minority populations for bus (90 percent vs. 87 percent), MAX (20 percent vs. 14 percent) and WES (1.2 percent vs. <1 percent).
 2. The percent of low-income population with service available exceeds that of the higher income populations for bus (94 percent vs. 87 percent), MAX (23 percent vs. 14 percent) and WES (1.4 percent vs. <1 percent).
- Thus, there are no Disparate Impacts on minority population or Disproportionate Burdens on low-income population in regard to availability of service on bus, MAX or WES.

Table IV-9: Availability of Service by Mode
 Minority/Non-Minority and Low-Income/Higher Income Population
 TriMet District
 Fall 2018 Service

Demographic Analysis of Proximity to TriMet Service (percent)		TM District		Percent within 1/2* Mile of...			Frequent Service	
		Totals (raw num)	Totals (pct.)	Bus	MAX	WES	Bus	Bus & MAX
Popula- tion	Total (ACS 5 year estimate, 2012-2016)	1,570,303	100.0%	88.2%	16.1%	0.8%	53.7%	69.8%
Minority	All Minorities**	447,829	28.5%	90.2%	20.1%	1.2%	54.7%	74.9%
Non-Mi- nority	White (Non-Hispanic)	1,122,471	71.5%	87.4%	14.4%	0.7%	53.3%	67.7%
Popula- tion	Total population with known income (ACS 5 year estimate, 2012-2016)***	1,547,395	100.0%	88.1%	16.0%	0.8%	53.4%	69.4%
Income	Below 150% of Poverty Level	333,680	21.6%	94.0%	23.1%	1.4%	64.6%	87.6%
Income	Above 150% of Poverty Level	1,213,715	78.4%	86.5%	14.0%	0.7%	50.4%	64.4%

Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Tables: 2012 - 2016 (5-Year Estimates), Table B03002. Hispanic or Latino Origin By Race, and Table C17002. Ratio Of Income To Poverty Level In The Past 12 Months (Block Group Level Data)

To adjust for the fact that some census block groups are only partially within the TriMet Transit District, staff estimated the fraction of each block group's population within the transit district by calculating the percentage of residential address points that fell within the district. Staff then multiplied this address fraction by the Census counts to get the estimated TriMet District population. Staff used Oregon Metro's Master Address File (with non-residential and vacant addresses removed) as the address points for this analysis.

* Distance calculations based on March 2018 stop and station locations. Similar to the TriMet District level population estimates, we multiplied each block group's counts by the fraction of addresses within it that also fell within a half-mile buffer of a transit stop of the specified type.

** All Minorities include Black (non-Hispanic), Hispanic, Asian (non-Hispanic), Native American (non-Hispanic), Hawaiian Native and Pacific Islander (non-Hispanic), and Other (Including Mixed Race, non-Hispanic).

*** Population totals for the TriMet district vary between statistics for race and income/poverty in part due to the fact that the Census is a full count and the ACS is an extrapolation based on a sample, and in part because the ACS total excludes those whom poverty status is not determined.

7. STOP AMENITIES

TriMet analyzes the distribution of stop amenities in the TriMet system (shelters, seating, waste receptacles, et al.) in order to identify any potential disparities. Table IV-10 shows the percentage of stops along minority and non-minority lines containing each amenity. Table IV-11 shows the percentage of stops along low-income and higher income lines containing each amenity.

Table IV-10: Stop Amenities on Minority and Non-Minority Lines
Fall 2018

Category of Amenity	Pct. of Stops on Minority Lines	Pct. of Stops on Non-Minority Lines
Seating	38%	32%
Lighting	59%	63%
Elevators	<1%	<1%
Digital Displays	2%	3%
Shelters	19%	17%
Signs, Maps and/or Schedules	86%	79%
Waste Receptacles	17%	14%

Table IV-11 Stop Amenities on Low-Income and Higher Income Lines
Fall 2018

Category of Amenity	Pct. of Stops on Low-Income Lines	Pct. of Stops on Higher Income Lines
Seating	41%	29%
Lighting	62%	61%
Elevators	<1%	<1%
Digital Displays	4%	1%
Shelters	23%	12%
Signs, Maps and/or Schedules	84%	80%
Waste Receptacles	20%	11%

Findings

1. The percentage of stops containing each amenity on minority lines exceeds the percentage for non-minority lines in all categories examined with the exception of lighting, which is

- higher for non-minority lines (63 percent compared to 59 percent of stops). However, this is within the system-wide Disparate Impact threshold of 20%.
2. The percentage of stops containing each amenity on low-income lines exceeds the percentage for higher income lines in all categories examined.
- Thus, there is no Disparate Impact on minority population or Disproportionate Burden on low-income population in regard to the distribution of amenities.

8. VEHICLE ASSIGNMENT

In regard to assessing the results of TriMet’s vehicle assignment practices in the context of Title VI, the vehicle assignment policy is that the average age of vehicles on minority lines should be no more than the average age of vehicles on non-minority lines. For bus and MAX, average age is calculated by weighting the age of vehicles by the number of hours in service. For WES, the age of primary and spare vehicles are listed separately because vehicle assignment is done differently than for the other modes. Vehicle assignment for minority and non-minority lines is shown in Table IV-12.

Table IV-12: Vehicle Assignment
Average Age of Vehicles Assigned by Mode
Fall 2018 Service

Mode of Service	Avg. Age of Vehicles (Years)		Difference; Minority to Non-Minority +/-(-)
	Minority Lines	Non-Minority Lines	
Bus	6.9	6.8	0.15
MAX Light Rail	16.6	17.4	(0.80)
WES Com-muter Rail	Primary: 12.0 Spares: 66.5	n/a	n/a

Findings

1. The average age of vehicles on minority bus lines (6.9 years) is about 2% older than the average age of vehicles on non-minority bus lines (6.8 years). This is within the system-wide Disparate Impact threshold of 20%.
2. The average age of vehicles on minority MAX lines (16.6 years) is about 5% newer than the average age of vehicles on non-minority MAX lines (17.4 years).
3. For WES, TriMet does not maintain a detailed database of specific vehicles used for specific trips. The four main vehicles used for WES service were all built in 2007; the remaining two were built in 1952 and 1953 and are typically used as spares. WES is a non-minority line.

- Thus, there are no Disparate Impacts on minority population in regard to vehicle assignment on bus, MAX, or WES.

Additionally, TriMet’s expectation is that the average age of vehicles on low-income lines should be no more than the average age of vehicles on higher income lines. Vehicle assignment for low-income and higher income lines is shown in Table IV-13.

Table IV-13: Vehicle Assignment
Average Age of Vehicles Assigned by Mode
Fall 2018 Service

Mode of Service	Avg. Age of Vehicles (Years)		Difference; Low Income to Higher Income +/-
	Low Income Lines	Higher Income Lines	
Bus	7.0	6.8	0.22
MAX Light Rail	16.7	n/a	n/a
WES Com-muter Rail	Primary: 12.0 Spares: 66.5	n/a	n/a

Findings

1. The average age of vehicles on low-income bus lines (7.0 years) is about 3% older than the average age of vehicles on higher income bus lines (6.8 years). This is within the system-wide Disparate Impact threshold of 20%.
 2. The MAX lines are considered low-income. The average age is 16.7 years.
- Thus, there are no Disproportionate Burden on low-income population in regard to vehicle assignment on bus, MAX, or WES.

SUMMARY

As summarized in Table IV-14 and Table IV-15, TriMet finds no disparities in terms of performance standards that would indicate lesser service provision to minority or low-income populations. Across nearly every metric, minority/low-income lines actually performed better than non-minority/higher income lines, and minority/low-income populations have better access to the TriMet system based on residential proximity to service.

Table IV-14: Evaluation and Findings – Service Standards and Policies
 Comparison of Minority and Non-Minority Lines
 Fall 2018

Equity Metric: Distribution of Amenities Fall 2018				
Metric % of stops with amenity on minority vs. non-minority lines	<= 20% Difference	<=10% Difference	<=5% Difference	As good or better on minority lines
<i>Seating</i>	✓	✓	✓	✓
<i>Lighting</i>	✓	✓	✓	✗
<i>Elevators</i>	✓	✓	✓	✓
<i>Digital Displays</i>	✓	✓	✓	✗
<i>Shelters</i>	✓	✓	✓	✓
<i>Signs, Maps and/or Schedules</i>	✓	✓	✓	✓
<i>Waste Receptacles</i>	✓	✓	✓	✓

Equity Metric: Service Standards Fall 2018												
Metric Minority and non-minority comparison by mode and for the system as a whole	<=20% Difference			<=10% Difference			<=5% Difference			As good or better on minority lines		
	B u s	M A X	S y s	B u s	M A X	S y s	B u s	M A X	S y s	B u s	M A X	S y s
Vehicle Loads If the average load of minority lines is above the maximum load factor, comparison to average load of non-minority lines.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Service Frequency & Span Revenue hours of service provided on minority vs. non-minority lines.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
On-Time Performance Average percent on-time for minority vs. non-minority lines.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✗	✗
Vehicle Assignment Average age of vehicles serving minority vs. non-minority lines.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✗	✓	✗
Service Availability Percentage of minority vs. non-minority population within ½ mile of service.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

WES (a minority line) is the only commuter rail line, so it cannot be compared to other commuter rail lines. It is included as part of the overall system analysis.

✓ = Performance meets metric at level indicated
 ✗ = Performance does not meet level indicated

Table IV-15: Evaluation and Findings – Service Standards and Policies
 Comparison of Low-Income and Higher Income Lines
 Fall 2018

Equity Metric: Distribution of Amenities Fall 2018				
Metric	<= 20% Difference	<=10% Difference	<=5% Difference	As good or better on low-income lines
<i>Seating</i>	✓	✓	✓	✓
<i>Lighting</i>	✓	✓	✓	✓
<i>Elevators</i>	✓	✓	✓	✓
<i>Digital Displays</i>	✓	✓	✓	✓
<i>Shelters</i>	✓	✓	✓	✓
<i>Signs, Maps and/or Schedules</i>	✓	✓	✓	✓
<i>Waste Receptacles</i>	✓	✓	✓	✓

Equity Metric: Service Standards Fall 2018												
Metric	<=20% Difference			<=10% Difference			<=5% Difference			As good or better		
	B u s	M A X	S y s	B u s	M A X	S y s	B u s	M A X	S y s	B u s	M A X	S y s
Low-income and non-low-income comparison by mode and for the system as a whole												
Vehicle Loads If the average load of low-income lines is above the maximum load factor, comparison to average load of non-low-income lines.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Service Frequency & Span Revenue hours of service provided on low-income vs. non-low-income lines.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
On-Time Performance Average percent on-time for low-income vs. non-low-income lines.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Vehicle Assignment Average age of vehicles serving low-income vs. non-low-income lines.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✗	✓	✗
Service Availability Percentage of low-income vs. non-low-income population within ½ mile of service.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

WES (a low-income line) is the only commuter rail line, so it cannot be compared to other commuter rail lines. It is included as part of the overall system analysis. All MAX lines are low-income lines.

✓ = Performance meets metric at level indicated
 ✗ = Performance does not meet level indicated

Part V: Demographic Analysis

TriMet uses demographic data to assess equity in distribution of services, facilities, and amenities in relation to minority, low-income, and limited English proficient populations. Such data informs TriMet in the early stages of service, facilities, and programs planning and enables TriMet to monitor ongoing service performance, analyze the impacts of policies and programs on these populations and take appropriate measures to avoid or mitigate potential disparities. TriMet develops GIS maps and comparative charts to perform this analysis, relying on both ridership and population data within the service area.

The demographic data shown in this report is from the following sources:

- 2013-2017 American Community Survey (ACS)
- 2018 TriMet On-board Fare Survey

CURRENT SERVICE AND SERVICE AREA

The maps shown in Figures V-1 to V-4 display the distribution of minority, low-income, and LEP populations in relation to services throughout the TriMet service area

Service and Service Area in Figure V-1 shows all TriMet bus and rail lines, differentiated by Frequent Service lines and Standard or Rush Hour-only service lines.

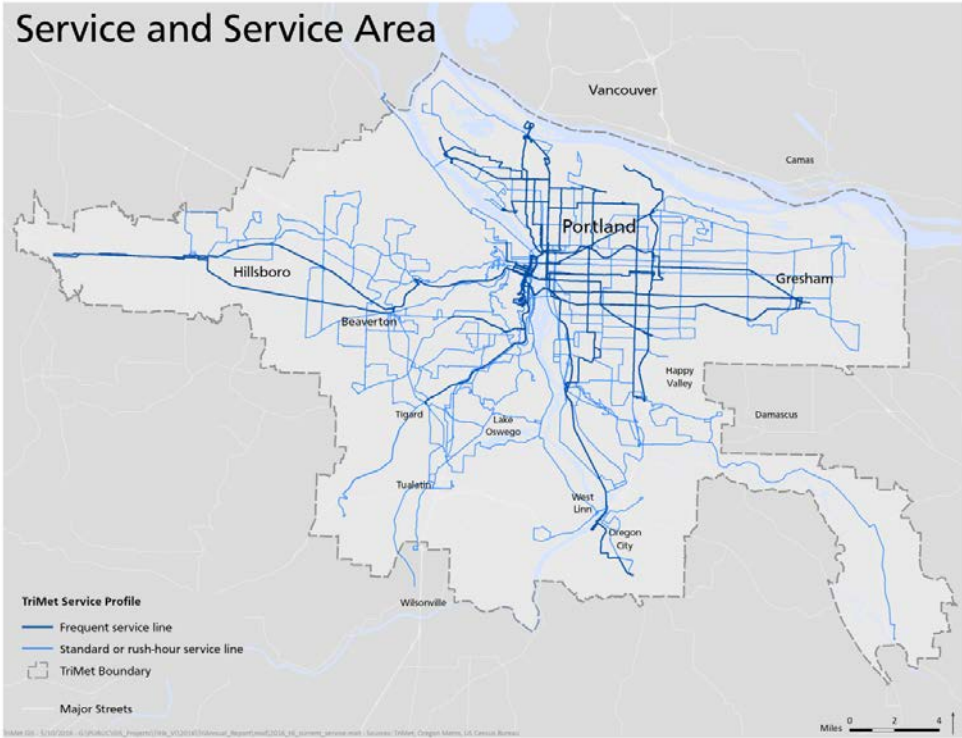


FIGURE V-1: SERVICE AND SERVICE AREA

Service Area with **Minority Population** in Figure V-2 depicts the TriMet network in relation to minority population by Census block group. Areas are shaded corresponding to block groups, which had a minority population greater than or equal to the average for the TriMet District (29.2 percent) as of the 2013-2017 ACS. This is an increase from 27.9% indicated in the 2010-2014 ACS.

Patterns are largely similar to TriMet’s 2016 Title VI Program submittal: most areas with higher concentration of minority populations are distributed across the western, eastern, and northern parts of the service area. A few block groups in the southwest areas of the TriMet district now have above-average minority populations, whereas in 2016 they were below average (near Tigard and Tualatin, for example).

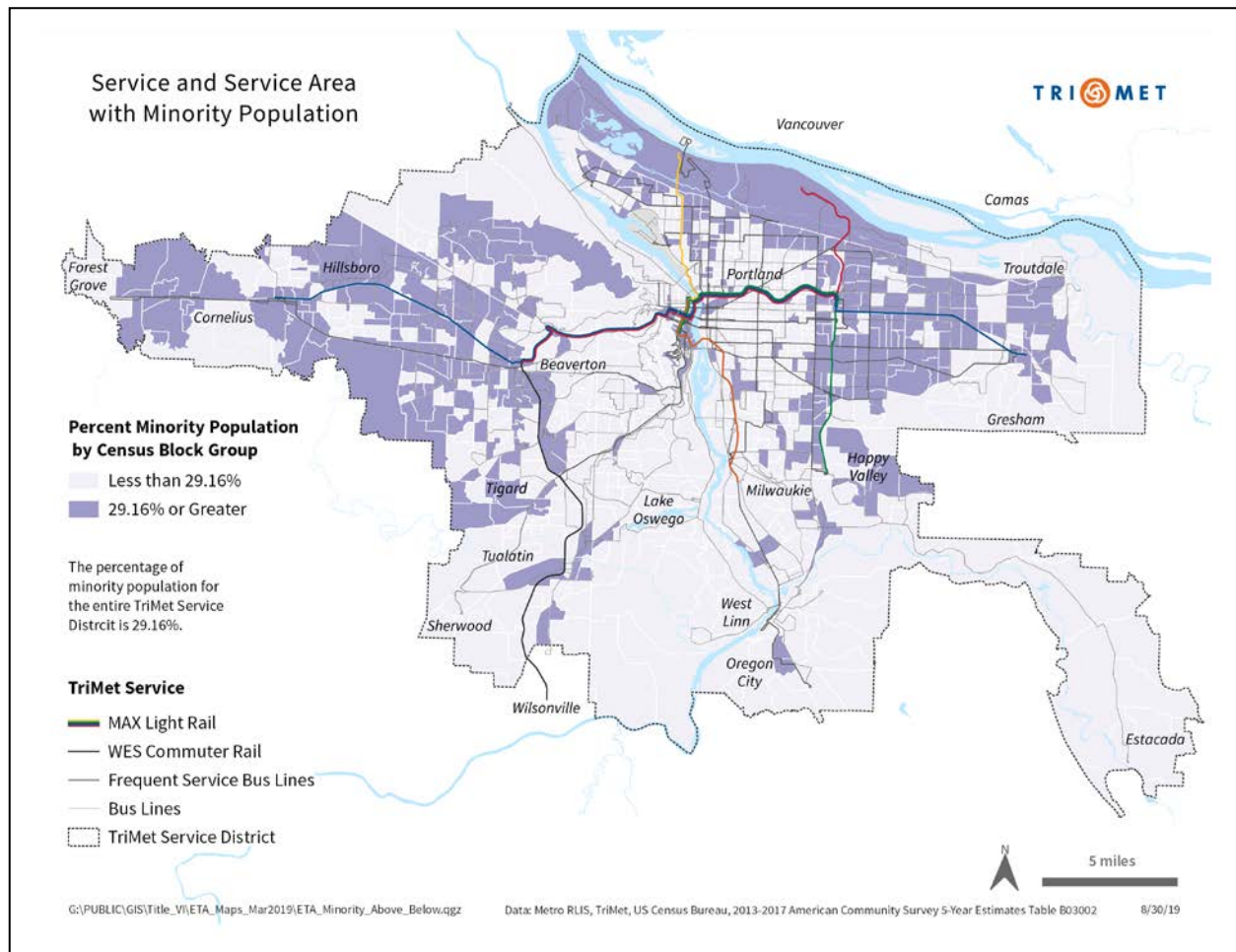


FIGURE V-2: SERVICE AND SERVICE AREA WITH MINORITY POPULATION

Service and Service Area with **Low-Income Population** in Figure V-3 depicts the TriMet network in relation to low-income population by Census block group. Low-income is defined as earning equal to or less than 150 percent of the Federal Poverty Level. Areas are shaded corresponding to block groups, which had low-income populations greater than or equal to the average for the TriMet District (20.7 percent) as of the 2013-2017 ACS. This is a decrease from 23.6% indicated in the 2010-2014 ACS. There are high concentrations of low-income households found throughout the service area.

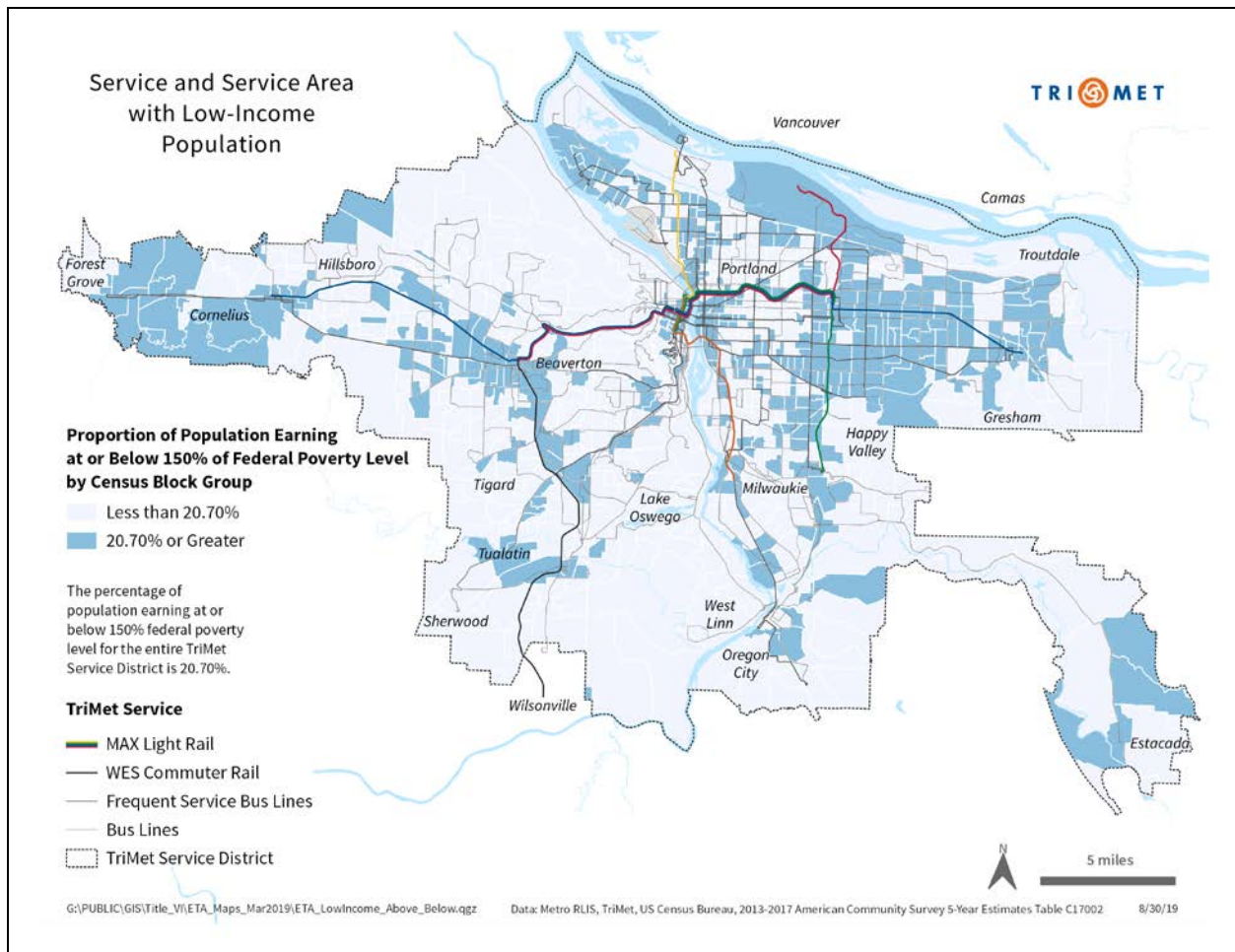


FIGURE V-3: SERVICE AND SERVICE AREA WITH LOW-INCOME POPULATION

Limited English Proficient (LEP) Population Distribution in Figure V-4 depicts the TriMet network in relation to LEP population by census tract, as language information is not available at a smaller geographic scale. Limited English Proficiency is defined as persons who report speaking English less than “very well” in the ACS. Areas are shaded corresponding to census tracts which had a LEP population greater than or equal to the average for the TriMet District (8.1 percent) as of the 2012-2016 ACS. Similar to the map of minority population, most above-average LEP census tracts are located in the western, eastern, and northern parts of the service area.

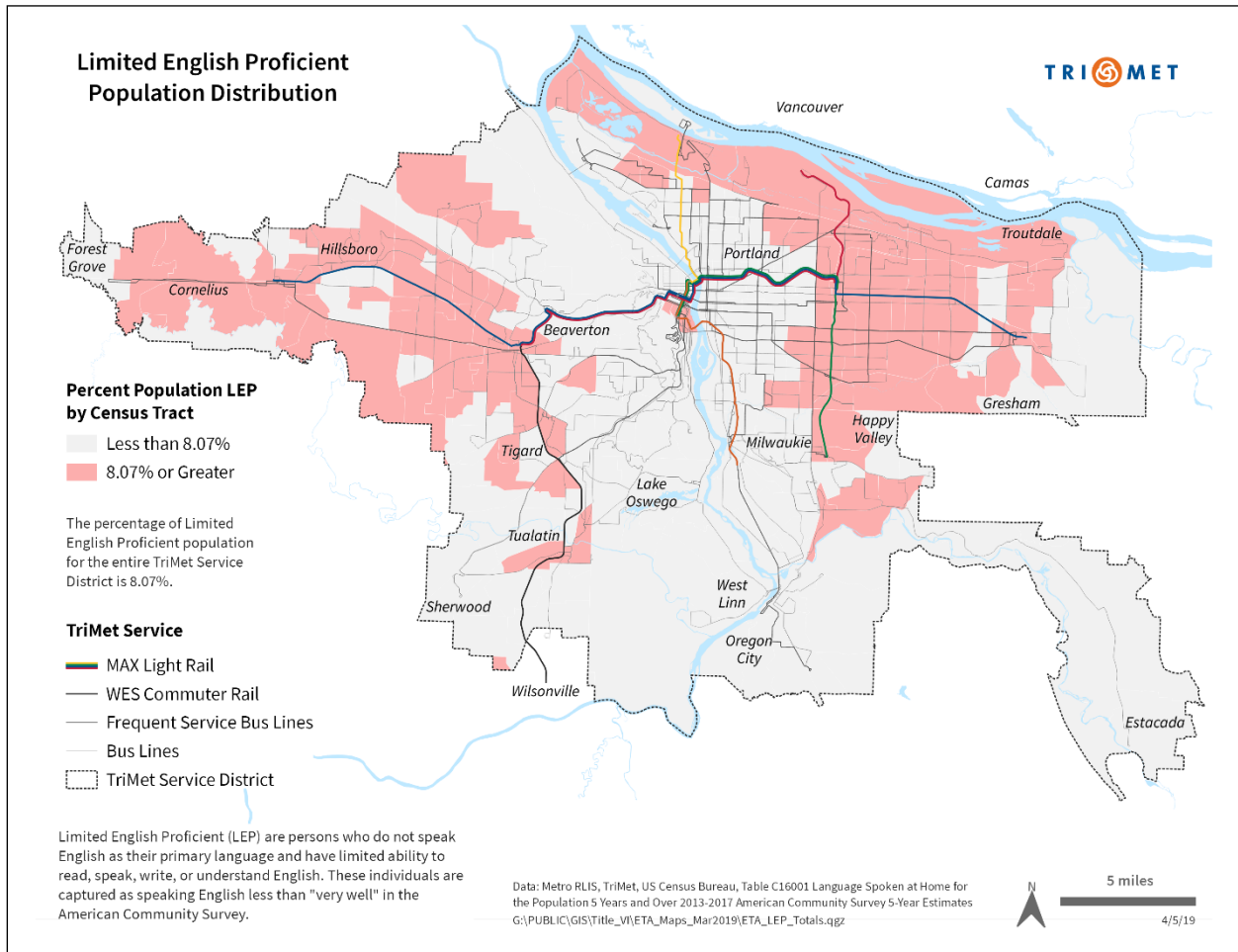


FIGURE V-4: SERVICE AND SERVICE AREA WITH LIMITED ENGLISH PROFICIENT DISTRIBUTION

PROXIMITY TO SERVICE

TriMet performed a demographic analysis of proximity to TriMet Service. The information in Table V-1 on the next page shows population counts and percentages of those within one-half mile of service by race/ethnicity and low-income. This is also delineated by type of service, i.e. bus, MAX, and WES; and Frequent Service bus and MAX.

Of note, a greater percentage of minorities and low-income populations are located within one-half mile of all forms of service than the population as a whole. Relative to other racial/ethnic groups, the black non-Hispanic population has the highest percentage of minority persons within half mile of bus and MAX service. For the WES commuter rail line, the Hispanic population makes up the largest share of minority population served.

TABLE V-1: DEMOGRAPHIC ANALYSIS OF PROXIMITY TO TRIMET SERVICE

Demographic Analysis of Proximity to TriMet Service (percent)		TM District		Percent within 1/2* Mile of...			Frequent Service	
		Totals (raw number)	Totals (pct.)	Bus	MAX	WES	Bus	Bus & MAX
Population	Total (ACS 5 year estimate, 2013-2017)	1,590,996	100.0%	88.2%	16.4%	0.9%	45.8%	62.3%
Minority	All Minorities	463,940	29.2%	90.1%	20.7%	1.2%	48.0%	68.7%
	Black (non-Hispanic)	55,592	3.5%	95.6%	24.8%	0.5%	61.8%	86.5%
	Hispanic	200,647	12.6%	91.7%	21.3%	2.1%	50.4%	71.8%
	Asian (non-Hispanic)	123,684	7.8%	85.9%	19.4%	0.4%	37.9%	57.4%
	Native American (non-Hispanic)	7,688	0.5%	89.1%	18.6%	0.6%	49.3%	67.9%
	Hawaiian Native and Pacific Islander (non-Hispanic)	7,203	0.5%	94.1%	26.2%	1.0%	53.2%	79.4%
	Other (Including Mixed Race, non-Hispanic)	69,126	4.3%	88.3%	17.2%	0.6%	47.2%	64.4%
Non-Minority	White (non-Hispanic)	1,127,057	70.8%	87.4%	14.7%	0.7%	45.0%	59.6%
Population	Total population with known income (ACS 5 year estimate, 2013-2017)**	1,568,502	100.0%	88.1%	16.3%	0.9%	45.6%	61.9%
Income	Below 150% of Poverty Level	324,718	20.7%	93.6%	23.6%	1.5%	57.7%	81.3%

Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Tables: 2013 - 2017 (5-Year Estimates)
 Populations of block groups that are only partially within the TriMet district were adjusted using residential address points from the Oregon Metro Master Address File.

* Distance calculations based on March 2018 stop and station locations.

** Population totals for the TriMet district vary between statistics for race and income/poverty because the ACS total excludes those whom poverty status is not determined.

RIDERSHIP CHARACTERISTICS AND DEMOGRAPHICS (TRIP BASED)

TriMet rider weekday trip characteristics and demographic data presented in Attachment O used the TriMet 2018 Fare Survey data to provide a snapshot of weekday trips⁶ made by riders in terms of race/ethnicity, household income, and Limited English Proficiency (LEP).

Race/ethnicity and income are compared in the following pages and called out when significantly different at the 95% confidence level. The 2018 Fare Survey was a system wide on-board survey with a 10% sample of trips for bus and MAX, with a 50% sample for WES. Data is weighted to originating rides.

TRIPS BY RACE/ETHNICITY 2018 FARE SURVEY

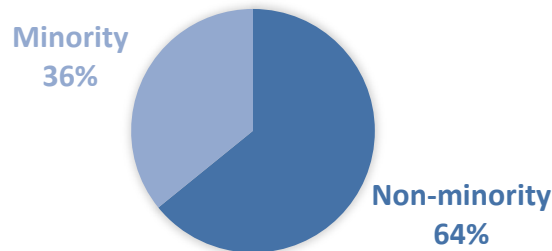


FIGURE V-5 TRIPS BY RACE/ETHNICITY

TRIPS BY INCOME 2018 FARE SURVEY

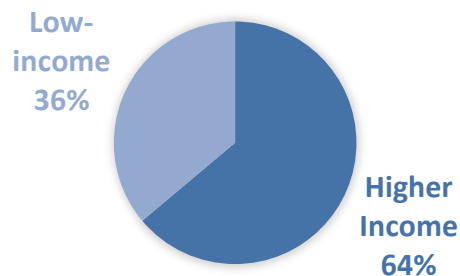


FIGURE V-6 TRIPS BY INCOME

Trips are more likely to be made by non-minority and higher income riders (64%), consistent with the Portland metro population. When looking at the American Community Survey (ACS) demographic

⁶ Data for weekend trips was also collected, but was not included in this submittal.

analysis in Table V-1, the TriMet Service district is 71% non-minority and 79% higher income. Note the ACS is a survey of people and includes all ages while the Fare Survey is a survey of trips and includes ages 12 or older.

Of those who took the Fare Survey in Spanish (entire survey available) or ten other languages (two questions available)⁷, few speak English very well (3%-6%), with the rest meeting the definition of limited English proficiency, or LEP. The most common languages selected by those who indicated they were not comfortable taking the survey in English were Russian, Vietnamese, and Arabic.

ABILITY TO SPEAK ENGLISH 2018 FARE SURVEY (NON-ENGLISH RESPONSES ONLY)

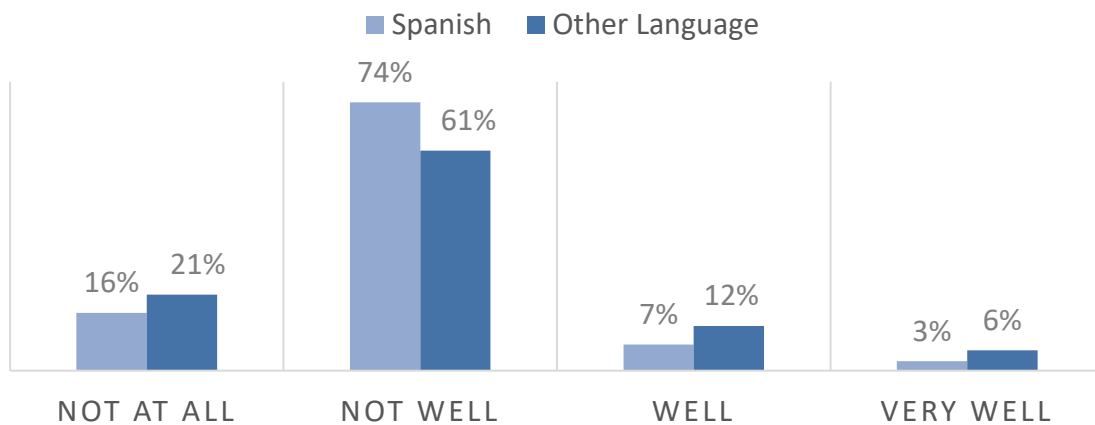


FIGURE V-7 ABILITY TO SPEAK ENGLISH

Vehicle Modes Used (Bus, MAX, WES)

Across all groups, the majority of trips are made by TriMet bus. However, both minority and low-income riders take a higher proportion of trips on bus and smaller proportion of trips on MAX light rail than non-minority and higher income riders. WES commuter rail trips comprise less than 1% of trips for all groups.

⁷ If riders indicated that they spoke neither English nor Spanish, they were asked to identify which language they spoke from a menu. They were then asked in their selected language how well they spoke English.

VEHICLE MODES USED 2018 FARE SURVEY

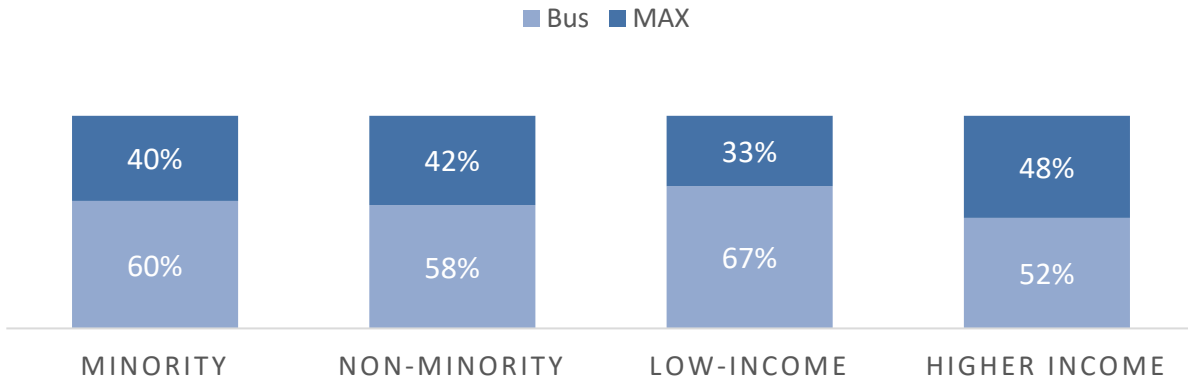


FIGURE V-8: VEHICLE MODES USED BY RACE/ETHNICITY AND INCOME

Ridership by Time of Day

Time of day comparisons show a greater proportion of trips made midday by low-income riders (51%) compared to higher-income riders (36%). Trips made by non-minority riders were more likely to include an AM peak trip when compared to trips made by minority riders.

RIDERSHIP BY TIME OF DAY 2018 FARE SURVEY

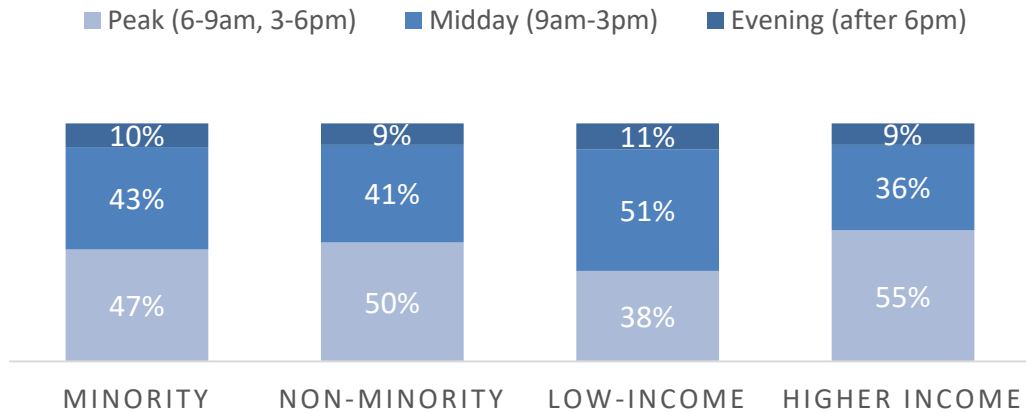


FIGURE V-9: RIDERSHIP BY TIME OF DAY BY RACE/ETHNICITY AND INCOME

Transfers

Most trips on TriMet did not involve a transfer. In other words, the majority of riders enjoyed a one-seat ride to complete their one-way trips. However, 31% of trips taken by low-income riders included a transfer - higher than the 22% of trips made by higher income riders. Trips made by minority riders were more likely to include a transfer than trips taken by non-minority riders (28% and 25%, respectively).

DOES YOUR TRIP REQUIRE A TRANSFER?

2018 FARE SURVEY

■ No Transfer ■ Transfer



FIGURE V-10: TRANSFER ACTIVITY BY RACE/ETHNICITY AND INCOME

Frequency of Riding TriMet

The average number of times respondents rode TriMet in the last week was higher for trips made by minorities and low-income riders. When grouped into categories of frequent/regular riders in Figure V-11, 90% of minority and 91% of low-income rode several times a week or more compared to 88% of non-minority and higher-income.

HOW OFTEN DO YOU RIDE TRIMET?

2018 FARE SURVEY

■ Frequent (almost every day) ■ Regular (several times/week)
 ■ Occasional (couple of times/month) ■ Infrequent (less than once/month)

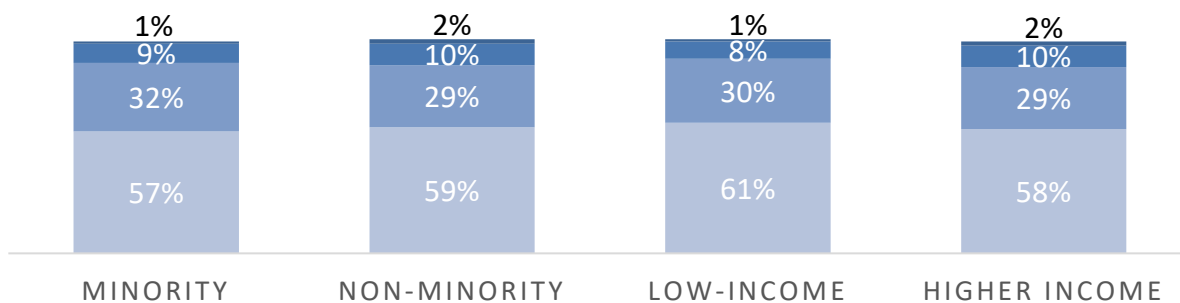


FIGURE V-11: FREQUENCY OF RIDING TRIMET BY RACE/ETHNICITY AND INCOME

Transit-Dependency

In order to explore transportation options available to TriMet riders, respondents were asked if they had a driver's license. Less than half of minority rider and low-income rider responses indicated they did not have a current driver's license. This was lower than non-minority (66%) and higher income (78%) rider responses.

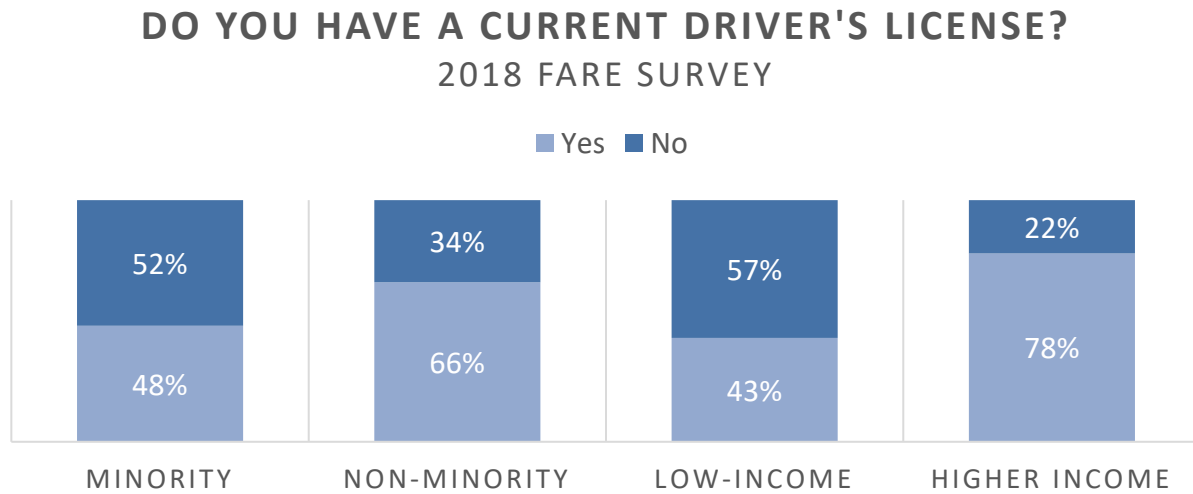


FIGURE V-12: CURRENT DRIVER'S LICENSE BY RACE/ETHNICITY AND INCOME

Fare Payment

In July of 2017, TriMet introduced a new electronic fare system called Hop Fastpass™. To assess rider payment method, a new question was added to the survey instrument asking: "Did you pay for this trip by using Hop?"

PAY FOR TRIP USING HOP? 2018 FARE SURVEY

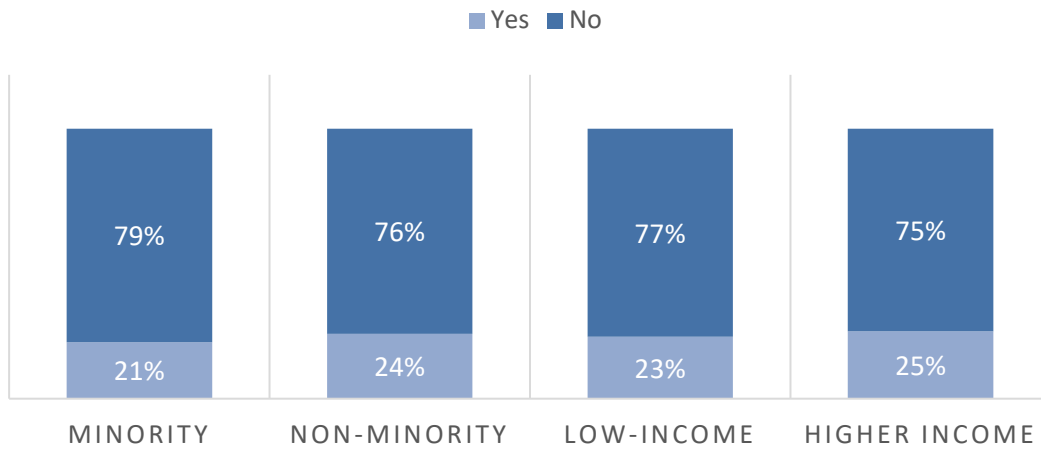


FIGURE V-13: E-FARE PAYMENT TYPE BY RACE/ETHNICITY AND INCOME

If Hop was not used as their fare payment method, riders were asked how they paid. As indicated in Figure V-14, the payment of fares across all categories were similar between minority and non-minority riders.

IF NO, HOW DID YOU PAY FARE?

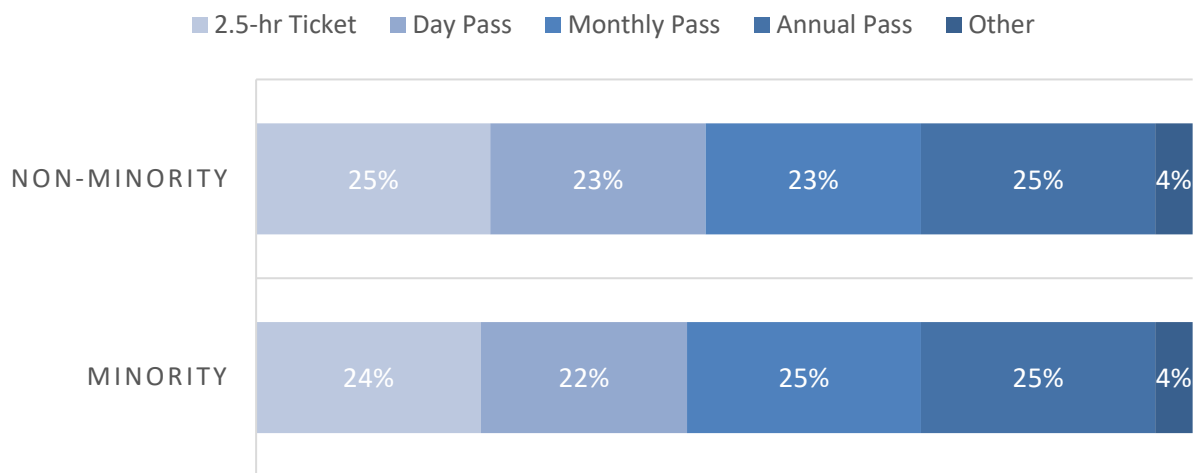


FIGURE V-14: FARE PAYMENT TYPE BY RACE/ETHNICITY

Conversely, fare payment comparisons between low-income and higher income riders reveal several differences, as shown in Figure V-15. Compared to fares paid by higher income riders, low-income

fares are more likely to be paid using a monthly pass or a Day Pass. While higher income riders were more likely to pay using an annual pass, most of which are obtained through employers. Trips paid with 2.5-hour tickets are comparable between the groups.

IF NO, HOW DID YOU PAY FARE?

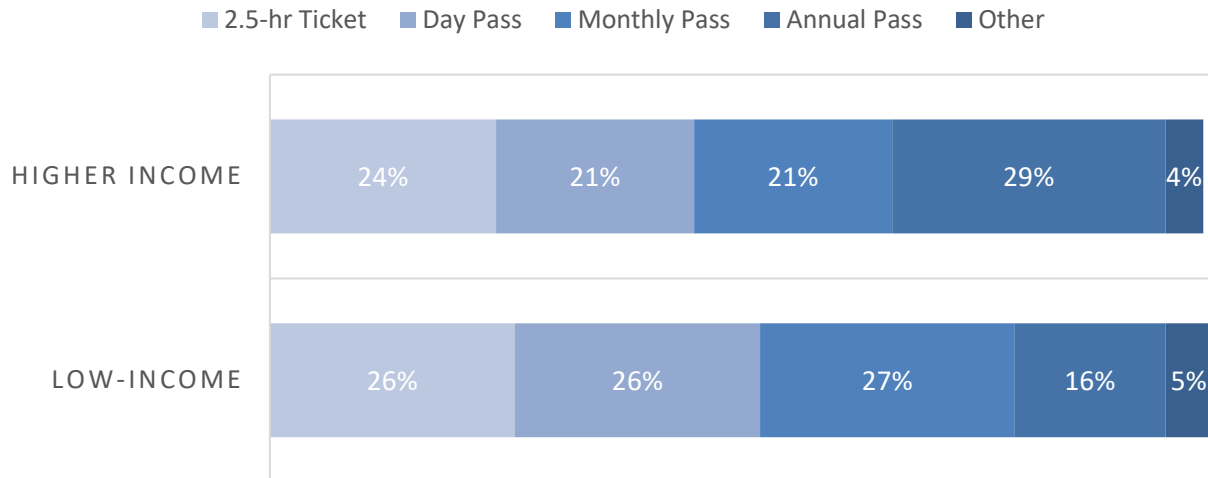


FIGURE V-15: FARE PAYMENT TYPE BY INCOME

In addition to the differences noted above are the following findings about fare purchase locations:

Minority vs. Non-Minority

1. Non-minority trips were more commonly paid for using the Mobile Ticket App.
2. Fares used by minority riders were more likely to be obtained on-board the vehicle or at school.

Low-income vs. Higher Income

1. Higher income trips were more commonly paid for using the Mobile Ticket App.
Fares used by low-income riders were more likely to be obtained on-board the vehicle, at school, at a retail store, or through a social service agency.

Age

There were some differences between age groups. Low-income and minority trips were made by younger ages (less than 25) while higher income and non-minority trips were made by older ages (35 or more).

AGE DISTRIBUTION 2018 FARE SURVEY

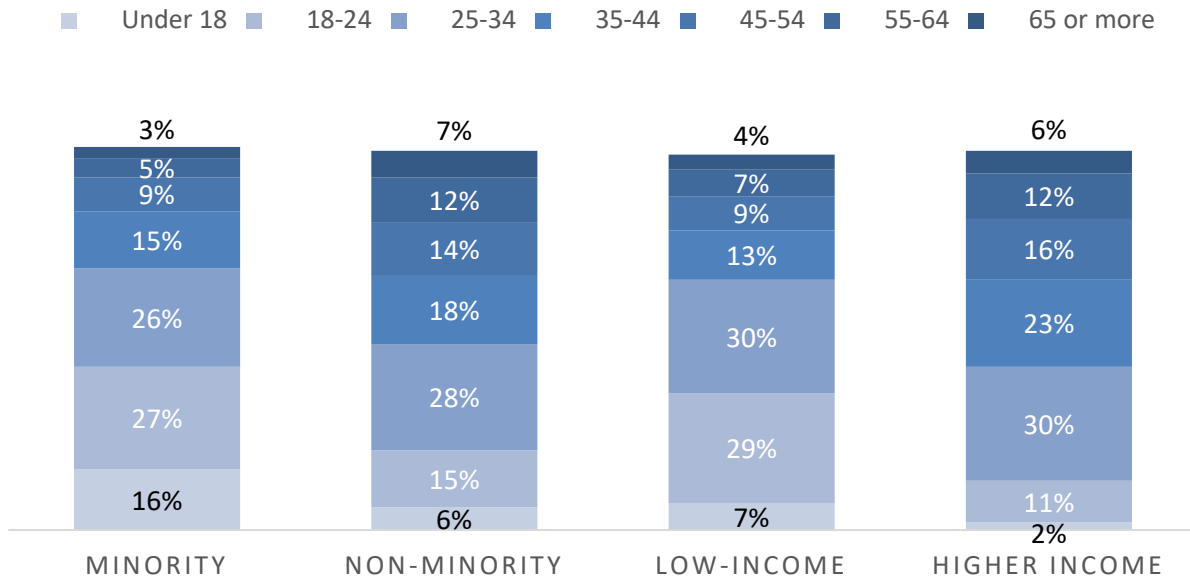


FIGURE V-16: AGE DISTRIBUTION BY RACE/ETHNICITY AND INCOME

Future Surveys

TriMet’s intention for surveying passengers is to conduct the Fare Survey every two years. This on-board survey will consist of an approximate 10% sample of trips on all vehicle types. The survey will be translated in full into Spanish since that is by far the foreign language spoken most often in the TriMet Service District. In addition, some LEP questions will be translated into other languages, as was done in 2018. Data collected will be similar to the 2018 Fare Survey, i.e., transfer rate, routes transferred to/from, ridership information, fare payment information, and demographics.

The TriMet Attitude & Awareness telephone survey of people ages 16+ in the TriMet Service District is conducted every year or every two years as needed. Sample sizes will be large enough for a 95% confidence level with a margin of error of between +/- 2% to +/- 4%. The survey is conducted in English and Spanish with both riders and non-riders. Respondents rate TriMet’s service and performance, tell about their ridership behavior, give opinions on new projects, and provide demographic information. TriMet may move to an addressed-based surveying methodology due to complications of telephone surveying.

FACILITIES

Three maps (Figures V-17, V-18, and V-19) are provided to illustrate determination of Title VI program compliance with respect to recent, in progress, and planned major transit facilities. These respective figures highlight transit facilities that:

1. Were recently⁸ replaced, improved⁹, or ;
2. Have improvements that are in progress, or;
3. Where improvements are scheduled (planned projects; projects identified in planning documents for an update in the next five years).

Figure V-17, Recent, In Progress, and Planned Facilities is organized by facility type. The improvements shown include the following:

Recently Completed

- Two storage and maintenance facility improvements
- One Battery Electric Bus
- 41 MAX light rail station improvements
- 9 major bus stop improvements
- 4 elevator refurbishments
- One new Park & Ride
- Three new Bike & Ride

In Progress and Planned

- One new maintenance and operations base
- Two Park & Ride improvements
- Four storage and maintenance facility improvements
- One new MAX light rail line
- One new high capacity bus corridor
- 8 MAX light rail station improvements
- 7 elevator refurbishments

Two planned improvements – labeled as “SW Light Rail Corridor” and “High Capacity Bus Corridor” – do not have final alignments determined as of this submittal, but the map indicates the current options being considered.

⁸ Recently means since the prior Title VI program submittal in 2016

⁹ Replacement and improvement excludes maintenance activities.

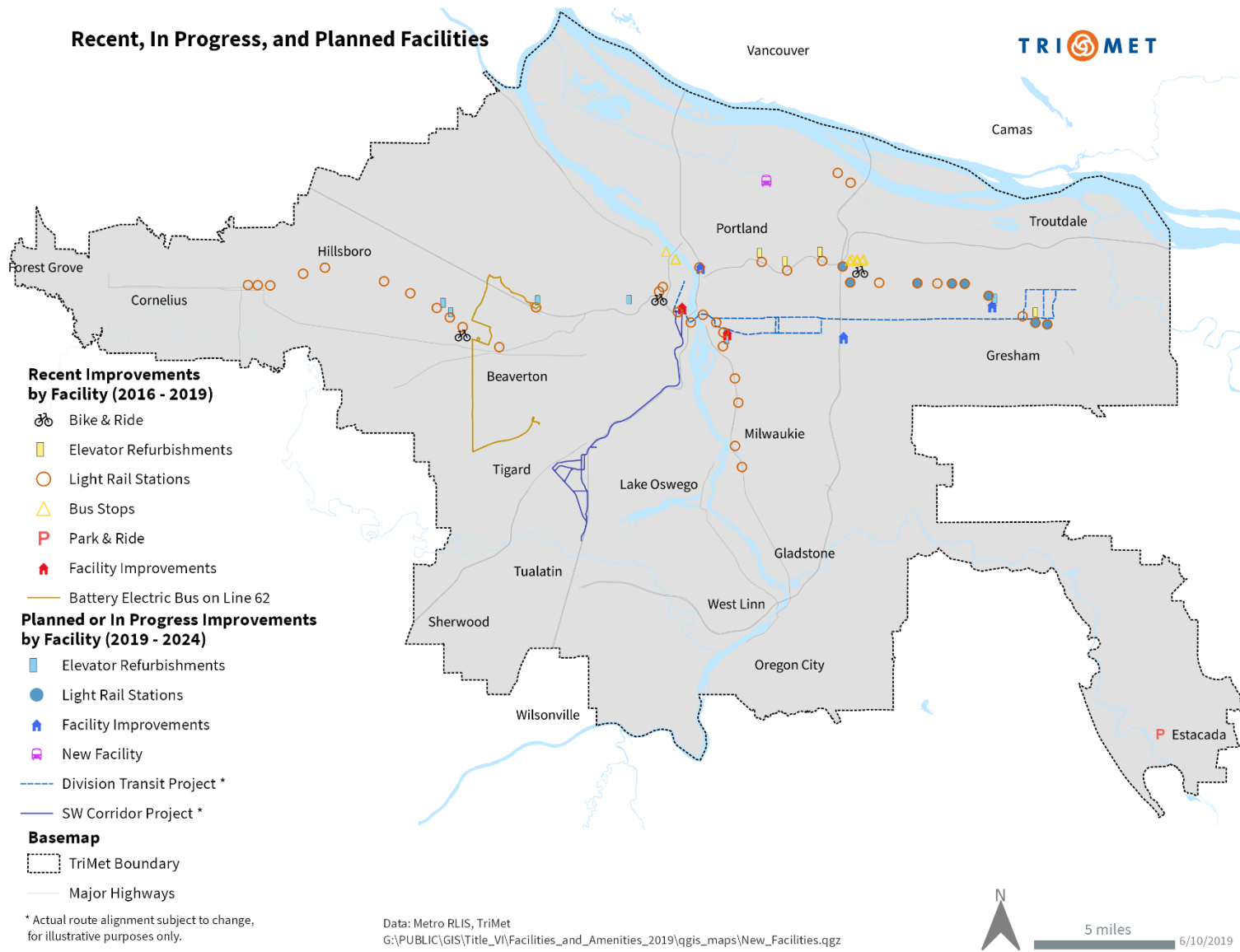


FIGURE V-17: RECENT, IN PROGRESS, AND PLANNED FACILITIES

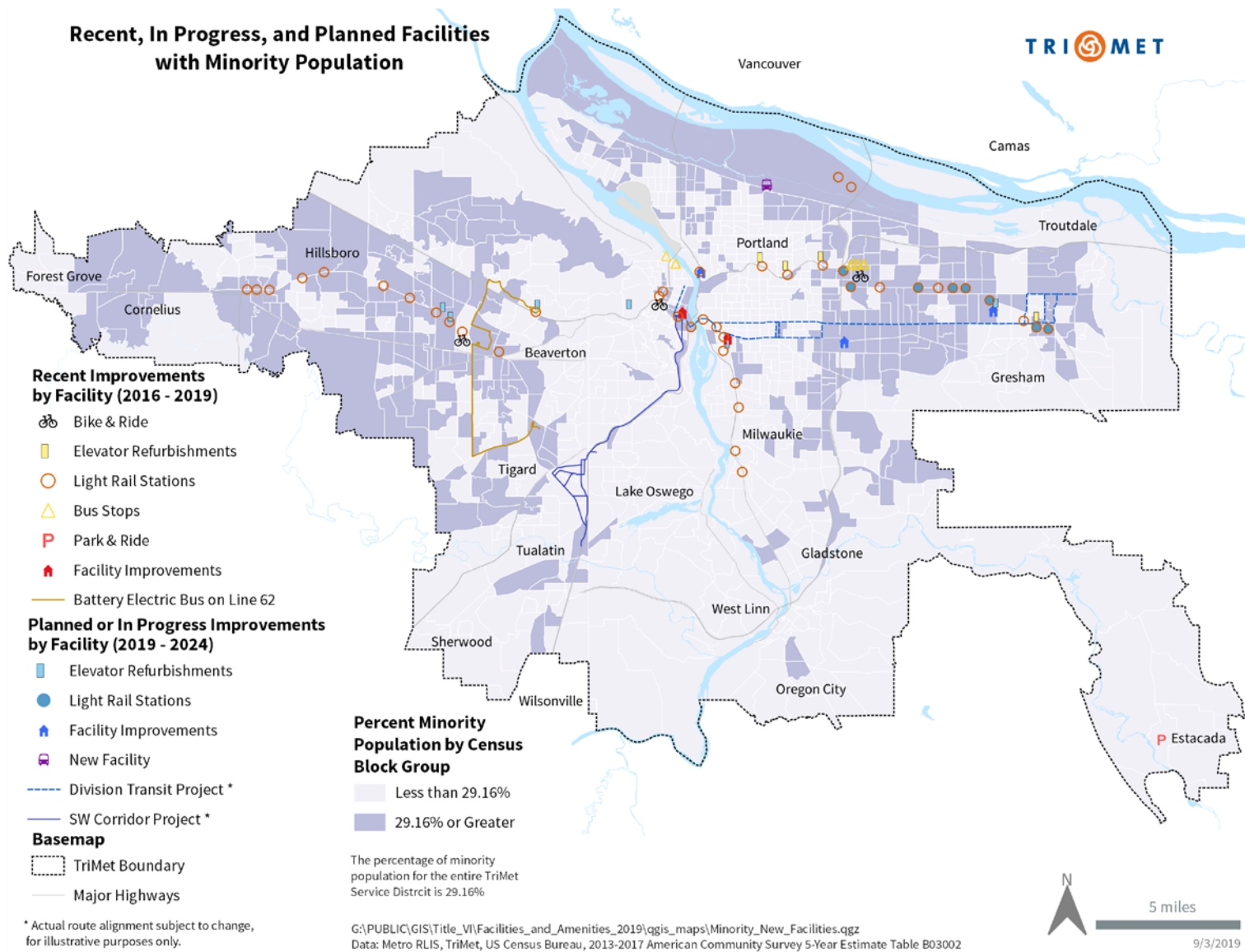


FIGURE V-18: RECENT, IN PROGRESS, AND PLANNED FACILITIES WITH MINORITY POPULATION

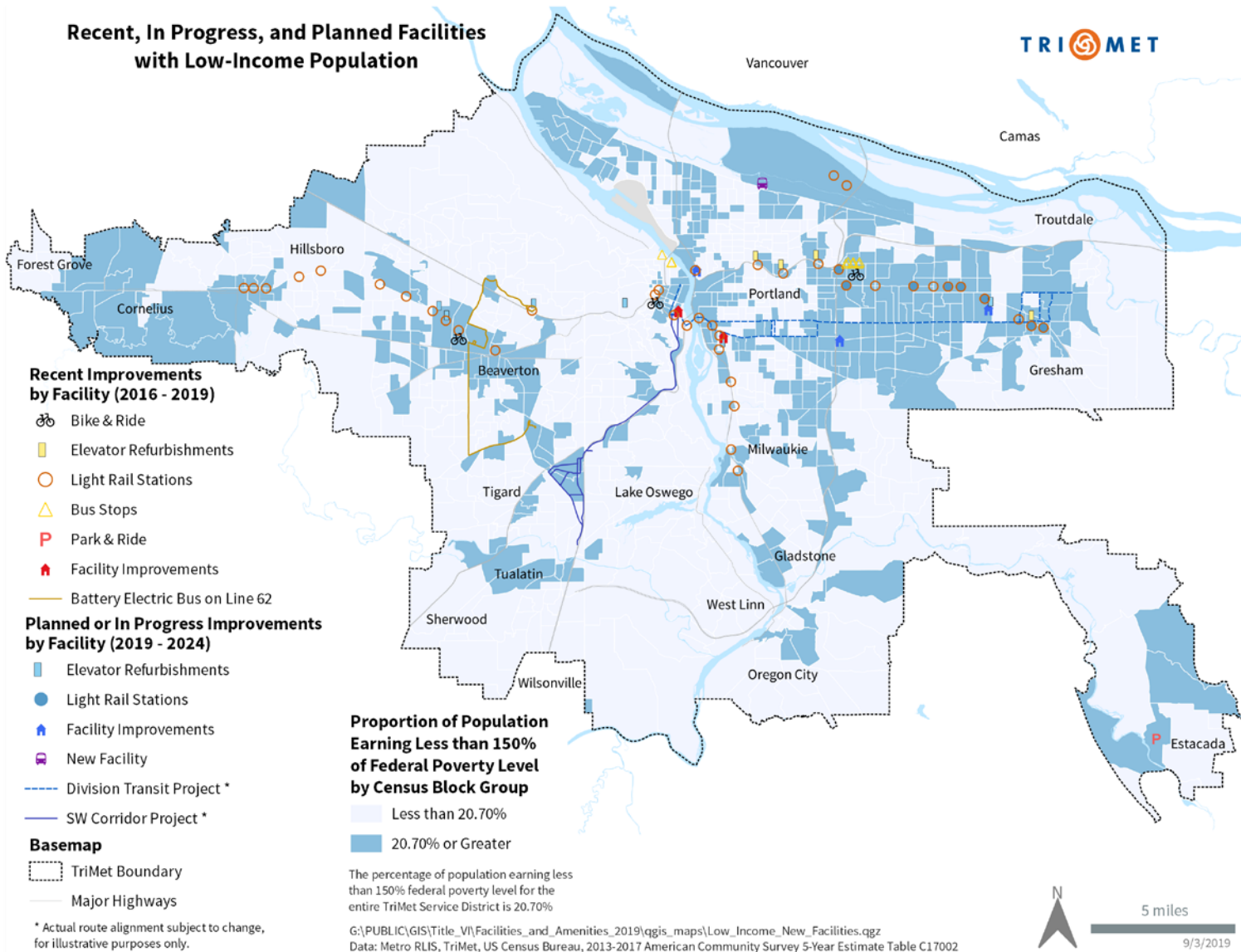


FIGURE V-19: RECENT, IN PROGRESS, AND PLANNED FACILITIES WITH LOW-INCOME POPULATION

Figure V-20 shows the location of **Existing Facilities** in relation to Frequent Service lines (all five MAX light rail lines and 15 Frequent Service bus lines). Facilities are depicted by type: administrative, operations/maintenance, park & ride, and transit centers.

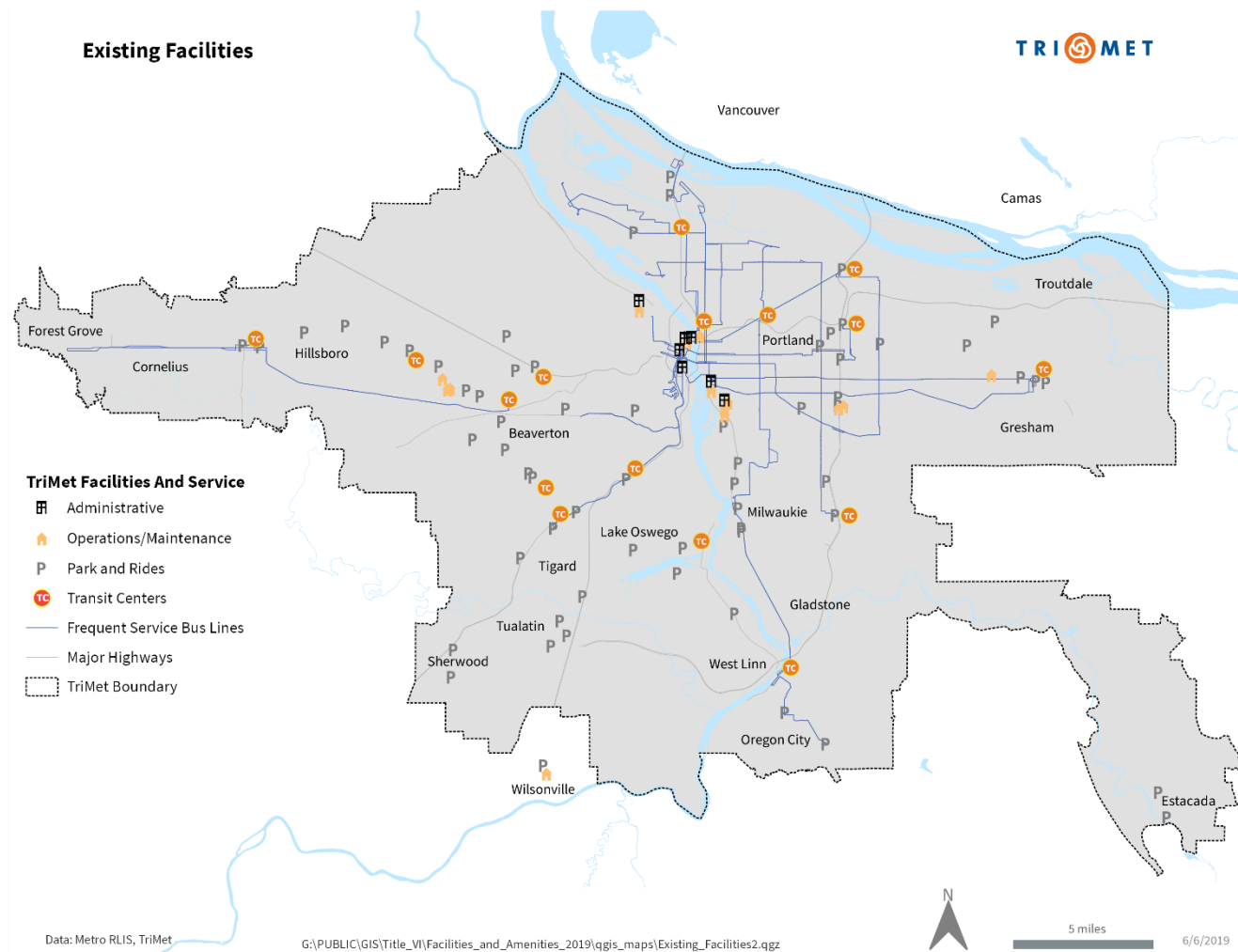


FIGURE V-20: EXISTING FACILITIES

Figure V-21 **Existing Facilities with Minority Population** shows the location of existing facilities and Frequent Service transit lines in relation to Census block groups with above average concentration of minority population (29.5 percent or greater). Facilities are depicted by type: administrative, operations/maintenance, park & ride, and transit centers.

Administrative facilities are located in the center of the service district whereas bus and rail operations/maintenance facilities are distributed in central, Westside, and Eastside locations.

Transit Centers are dispersed throughout the service area and park & ride facilities are dispersed along major rail and bus service corridors and are typically five miles or more from the Portland City Center.

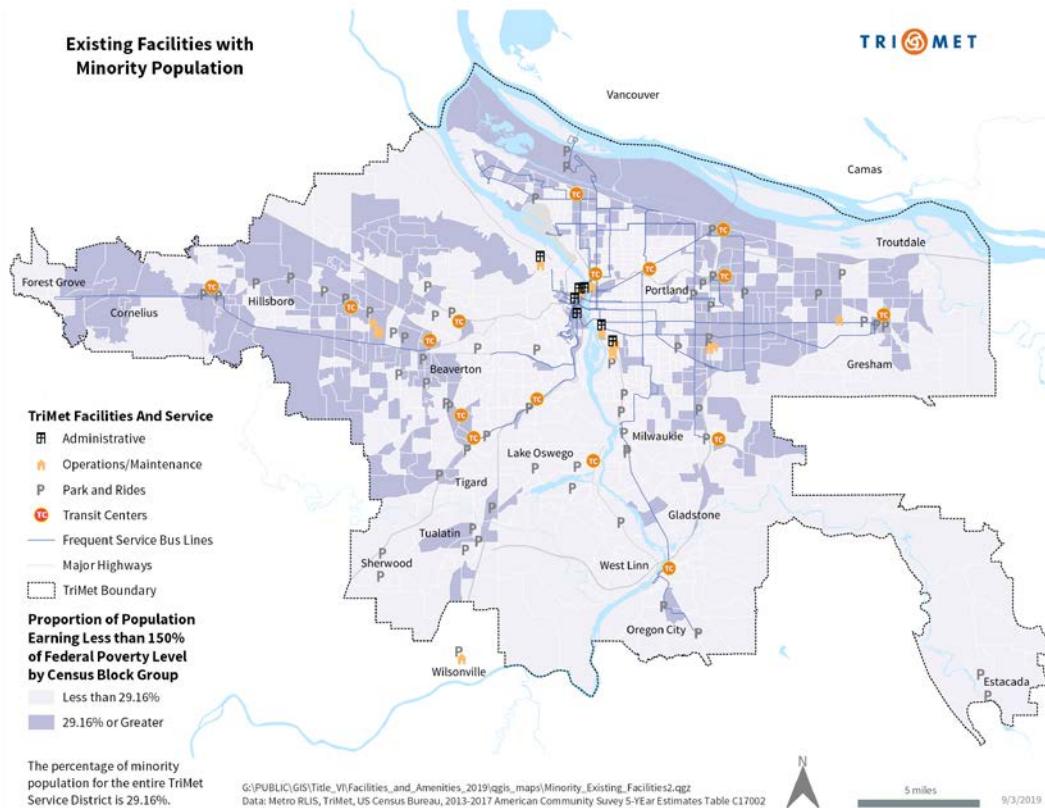


FIGURE V-21: EXISTING FACILITIES WITH MINORITY POPULATION

Figure V-22 Existing Facilities with Low-Income Population shows the location of existing facilities and Frequent Service transit lines in relation to Census block groups with above average concentration of low-income population (20.4% or greater). Facilities are depicted by type: administrative, operations/maintenance, park & ride, and transit centers.

Administrative facilities are located in the center of the service district whereas bus and rail operations/maintenance facilities are distributed in central, Westside, and Eastside locations.

Transit Centers are dispersed throughout the service area and park & ride facilities are dispersed along major rail and bus service corridors and are typically five miles or more from the Portland City Center.

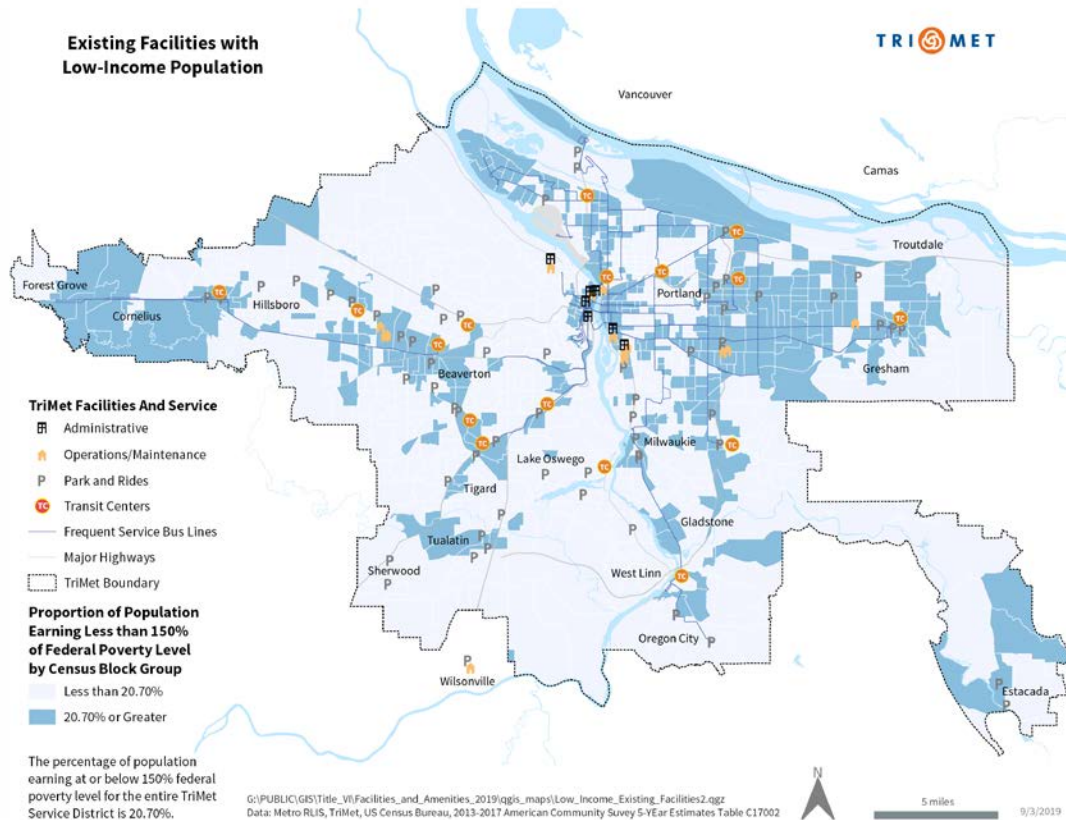


FIGURE V-22: EXISTING FACILITIES WITH LOW-INCOME POPULATION

AMENITIES

Maps of amenities by type and location on minority and on non-minority transit lines that follow illustrate the distribution of amenities overlaid on Census block groups with above-average concentration of minority population:

- Figure V-23 Amenity Distribution: Seating
- Figure V-24 Amenity Distribution: Digital Displays
- Figure V-25 Amenity Distribution: Elevators
- Figure V-26 Amenity Distribution: Shelters
- Figure V-27 Amenity Distribution: Signs, Maps, and/or Schedules
- Figure V-28 Amenity Distribution: Waste Receptacles

Due to the scale of the maps presented below, the large number of amenities, and many items' proximity to each other, these features were aggregated for display. To improve the interpretability of features, groups of like-amenities within 750 feet of each other were aggregated and the center of each cluster of points was used as the spatial location representing that group, and the number of individual points that made up each aggregation was added as an attribute of the new central point. In this process, minority amenities were aggregated only with other minority features and likewise with the non-minority group. This technique limited overlap between features while still preserving the majority of their location/spatial relationships to each other. Part IV-Service Monitoring includes a detailed location-based analysis of amenities placement and distribution in relation to minority and non-minority lines as well as low-income and higher income lines.

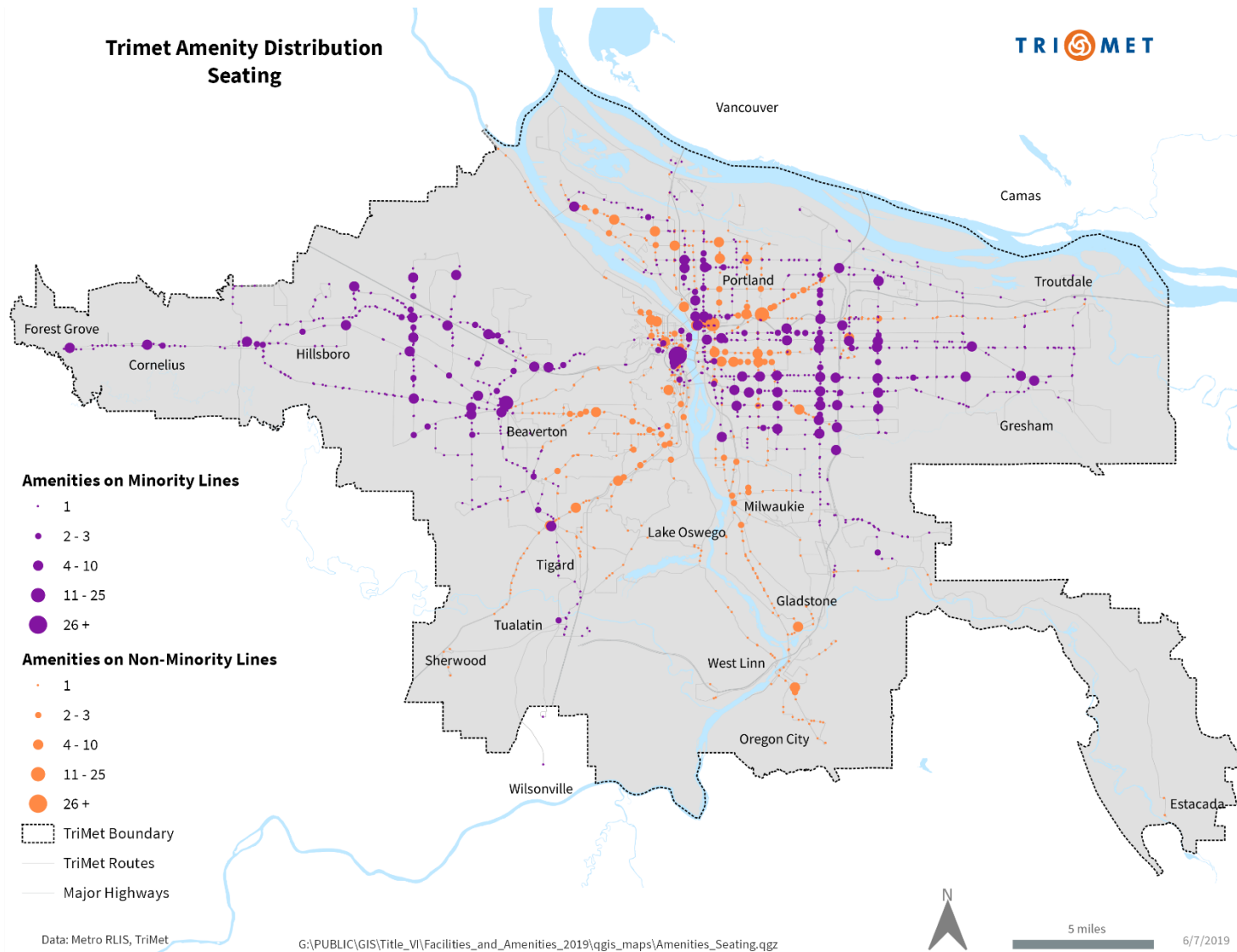


FIGURE V-23 AMENITY DISTRIBUTION: SEATING

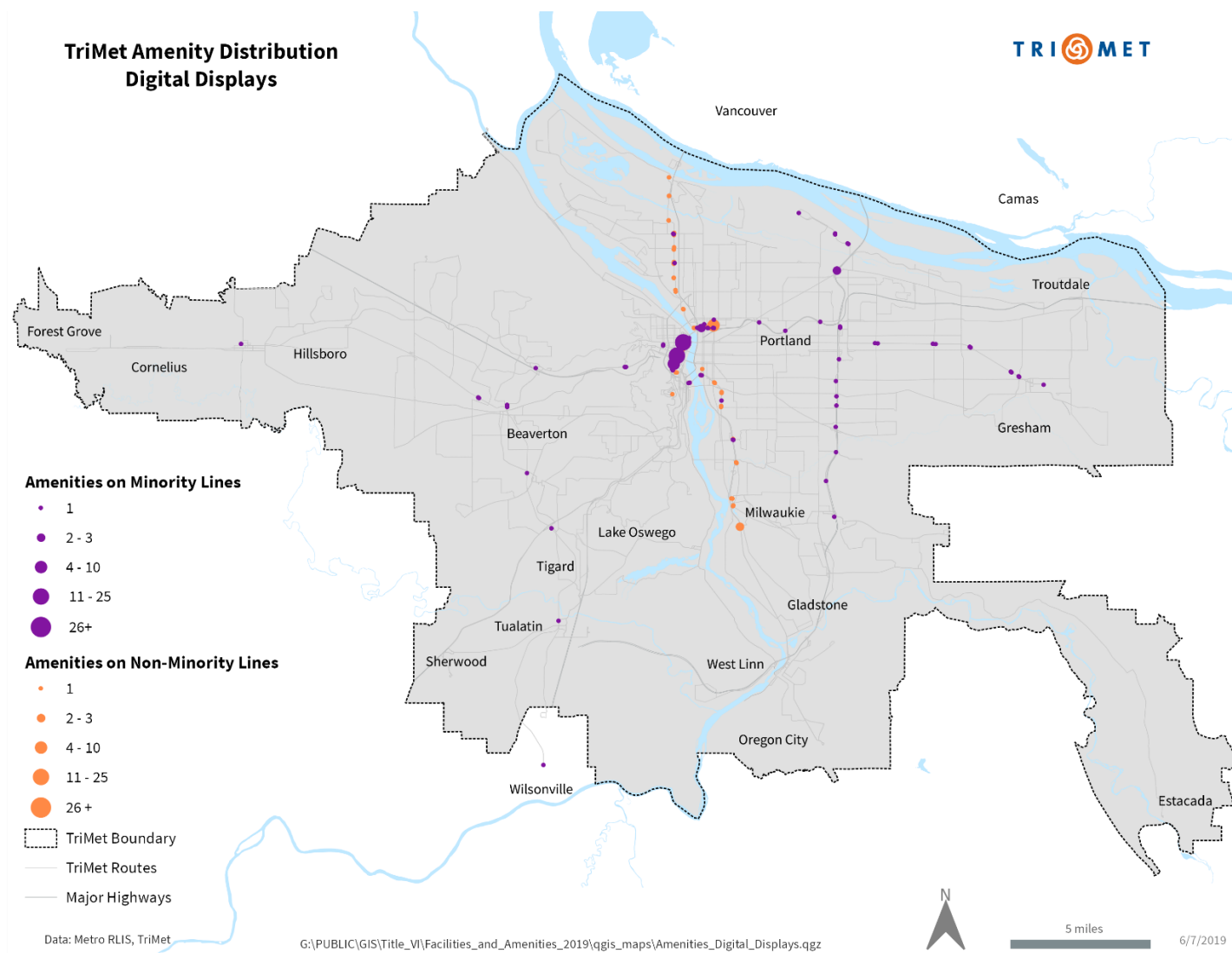


FIGURE V-24 AMENITY DISTRIBUTION: DIGITAL DISPLAYS

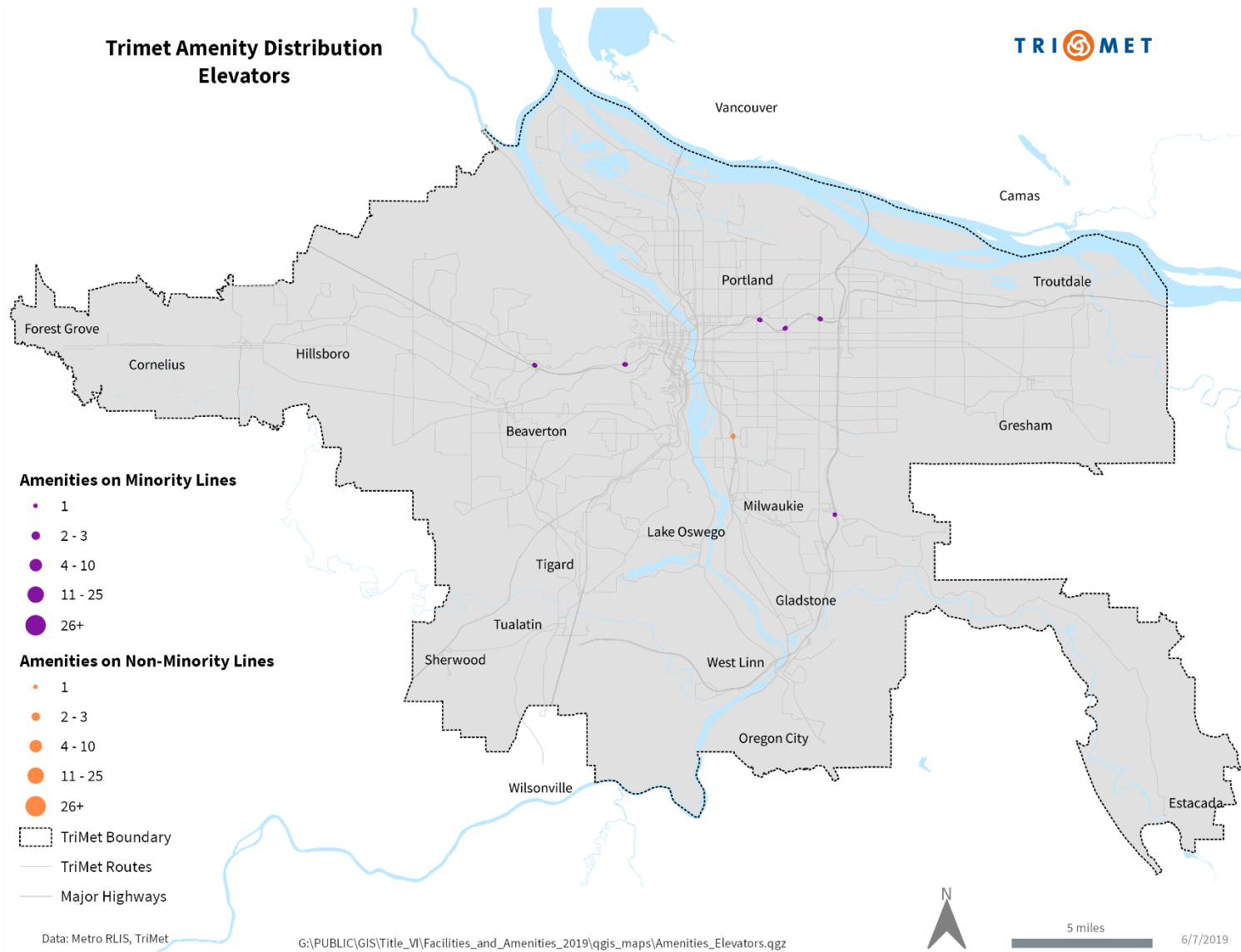


FIGURE V-25 AMENITY DISTRIBUTION: ELEVATORS

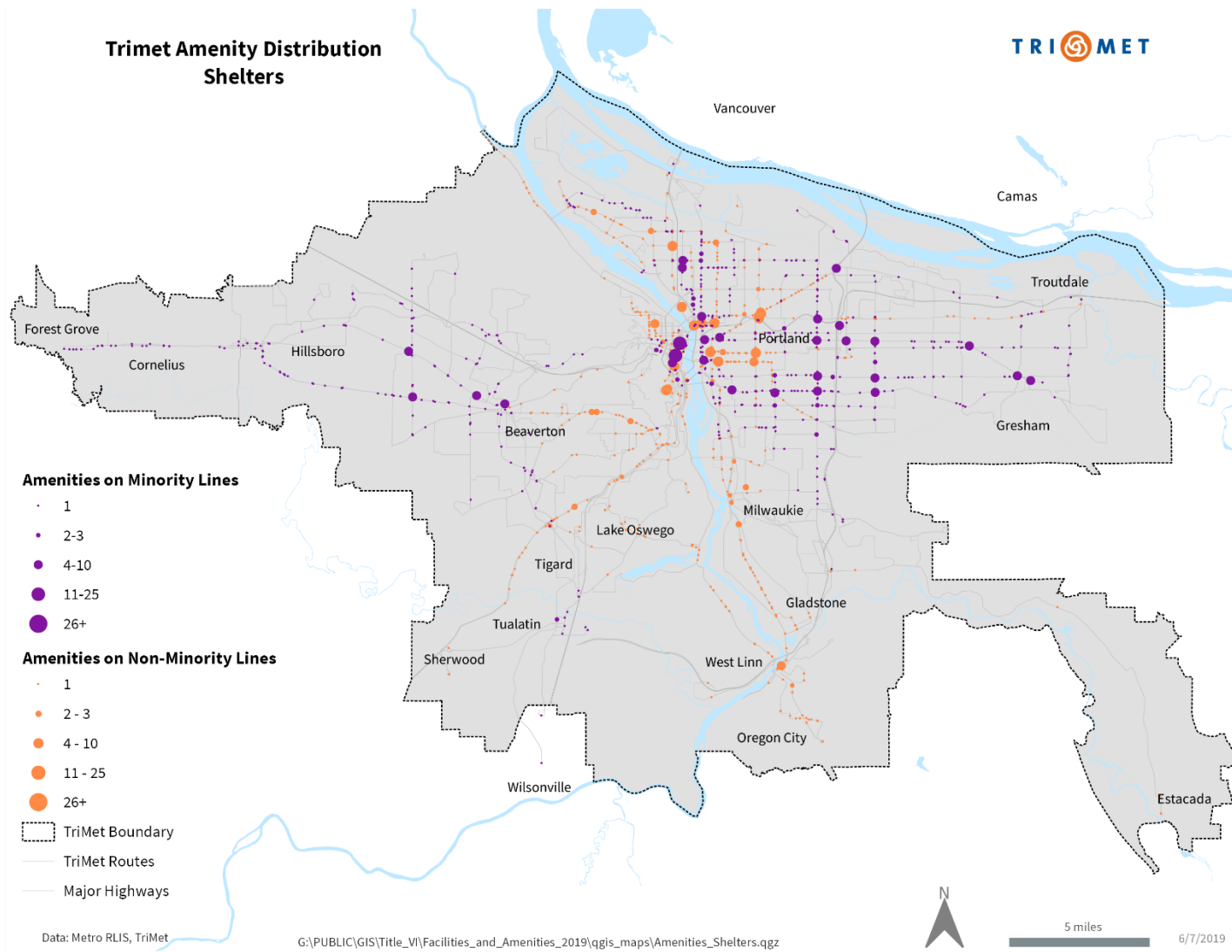


FIGURE V-26 AMENITY DISTRIBUTION: SHELTERS

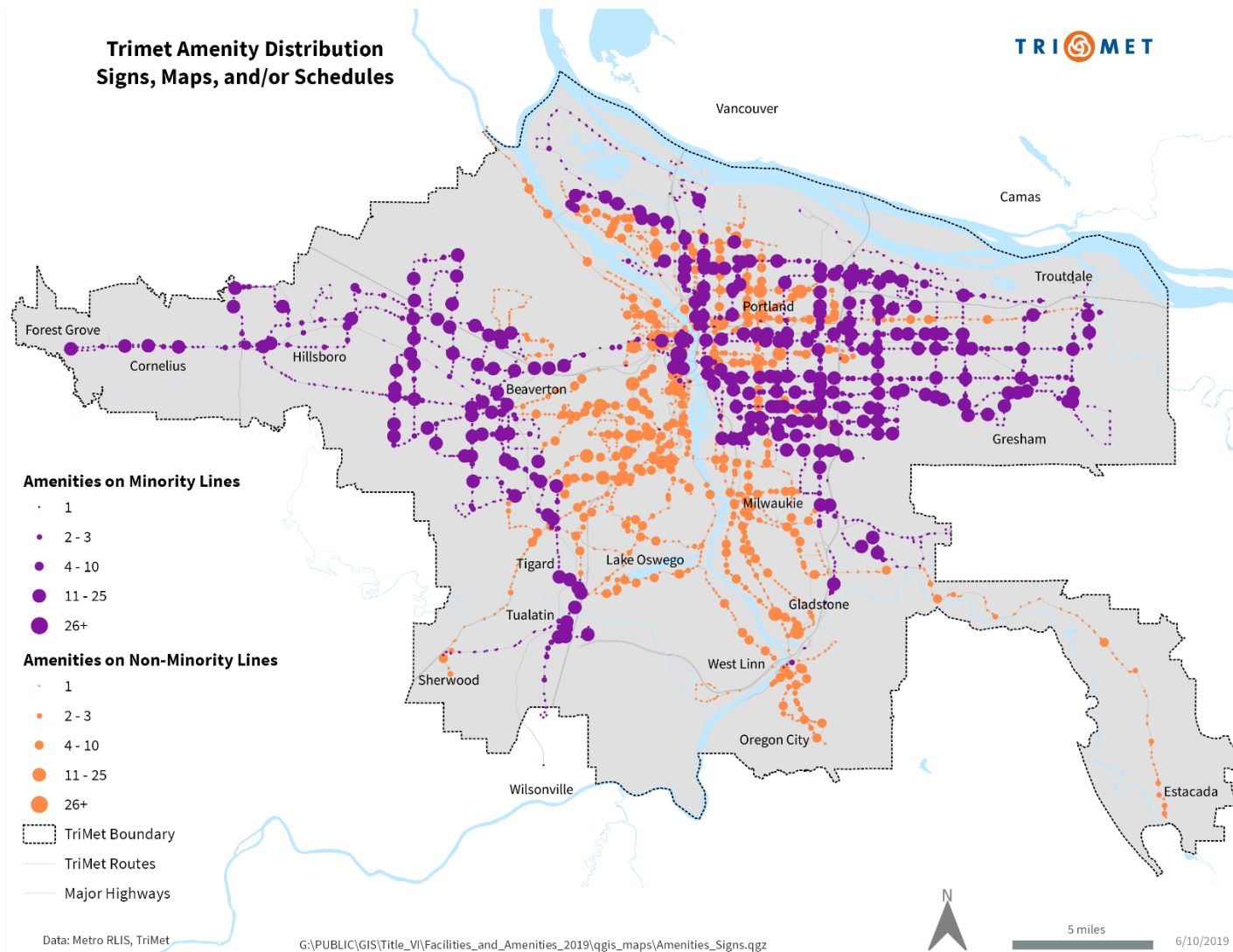


FIGURE V-27 AMENITY DISTRIBUTION: SIGNS, MAPS, AND/OR SCHEDULES

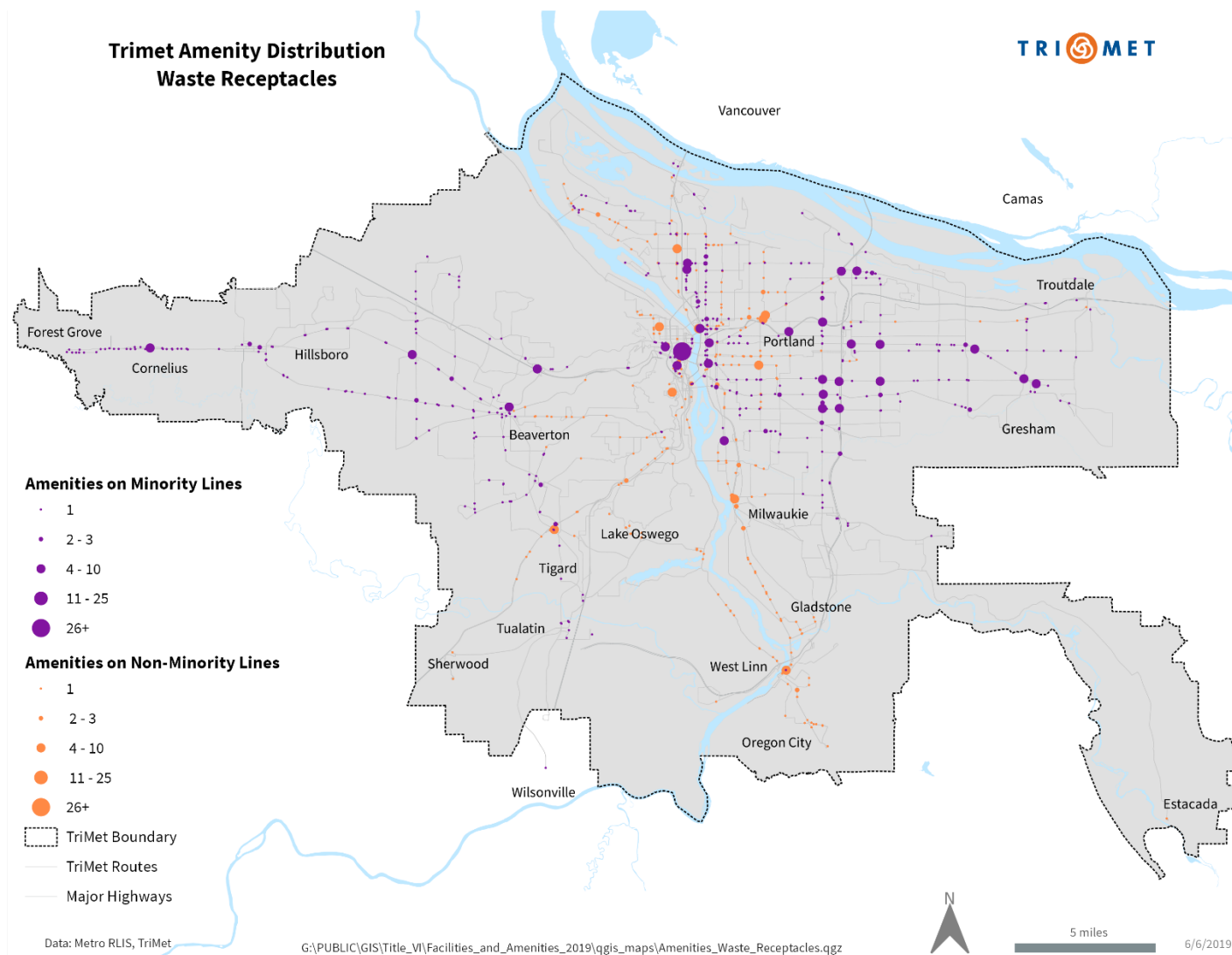


FIGURE V-28 AMENITY DISTRIBUTION: WASTE RECEPTACLES

Attachments

- A: TriMet Board Resolution 19-09-69 Approving TriMet's Title VI Program and Policies
- B: TriMet Title VI Complaint Form
- C: TriMet Title VI Vehicle Notice
- D: TriMet Title VI Administrative Office Notice
- E: TriMet Public Engagement Framework
- F: Language Access Plan & Implementation Schedule
- G: Subrecipient's Title VI Compliance Template
- H: 4th Bus Operations and Maintenance Base Equity Analysis, with Documentation of Board Approval
- I: FY2018 Annual Service Plan Equity Analysis, with Documentation of Board Approval
- J: Low-Income Fare Equity Analysis, with Documentation of Board Approval
- K: FY2019 Annual Service Plan Equity Analysis, with Documentation of Board Approval
- L: FY2020 Annual Service Plan Equity Analysis, with Documentation of Board Approval
- M: 30-Day Pass Elimination Fare Equity Analysis, with Documentation of Board Approval
- N: TriMet Service Guidelines Policy
- O: Data from 2018 On-board Fare Survey
- P: 2019 Title VI Program Update Outreach Materials

Attachment A

TRIMET BOARD RESOLUTION APPROVING TRIMET'S TITLE VI PROGRAM AND POLICIES

Date: September 18, 2019

To: Board of Directors



From: Doug Kelsey

Subject: RESOLUTION NO. 19-09-69 OF THE TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET) APPROVING THE 2019 UPDATE TO TRIMET'S TITLE VI PROGRAM AND POLICIES

1. Purpose of Item

This Resolution requests that the TriMet Board of Directors (Board) approve TriMet's 2019 Title VI Program Update, attached hereto as Exhibit A, for submission to the Federal Transit Administration (FTA) by October 1, 2019.

2. Type of Agenda Item

- Initial Contract
- Contract Modification
- Other: Approval of TriMet's 2019 Title VI Program Update

3. Reason for Board Action

TriMet must comply with Title VI regulations issued by the U.S. Department of Transportation (DOT) and the FTA. As a condition of receiving ongoing federal funds, the FTA requires each transit agency to submit an updated Title VI Program every three years. The FTA regulations require TriMet to brief its Board regarding TriMet's Title VI Program and Policies, including the results of its established service monitoring program, and obtain the Board's approval of the updated Title VI program before its submission to the FTA.

4. Type of Action

- Resolution
- Ordinance 1st Reading
- Ordinance 2nd Reading
- Other _____

5. Background

Title VI was enacted as part of the landmark Civil Rights Act of 1964. It prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. The Board was extensively briefed on TriMet's 2019 update to its Title VI Program and Policies during its August 14, 2019, Board meeting.

The FTA requires each large public transit agency's governing board to approve Title VI policies and standards in regard to:

- 1) Major Service Change Policy. A “Major Service Change Policy” is a threshold for when TriMet will conduct a comprehensive analysis of potential adverse effects and disparate impacts of service changes on minority and low-income populations.
- 2) Disparate Impact and Disproportionate Burden Policies. These Policies define the measures and thresholds for determining whether a fare change or major service change will result in a “disparate impact” on minority populations or a “disproportionate burden” on low-income populations.
- 3) System-wide Service Standards and Policies. These Policies are used to determine whether transit service and amenities are distributed equitably to minority and non-minority populations. TriMet’s Title VI Program must include the results from monitoring these service standards and policies, as well as document the Board’s awareness, consideration and approval of the monitoring results.
- 4) Public Engagement Process. The transit agency must show that its Title VI Program was developed with adequate public engagement, including providing public information and receiving input from minority and low-income populations, non-English speakers and community groups.

TriMet’s proposed updates to its Title VI Program were developed through public input gathered by Transit Equity, Inclusion, and Community Affairs Department staff in partnership with community based organizations. Staff attended community meetings to present information on the Title VI program updates, and to gather feedback and insight from TriMet riders. TriMet staff surveyed non-profit and community-based agency partners that participate in the Access Transit program to obtain additional input on potential Title VI program changes. The survey was also translated into Spanish, and was distributed to various community organizations that serve Spanish-speaking populations.

In addition, information on TriMet’s Title VI program, complaint procedures, and the proposed standards and policies were made available on the TriMet’s website for public comment and review. During the course of the Title VI program update process, the Transit Equity Advisory Committee (TEAC) provided feedback and ongoing support to improve the program, policies, and public engagement process, and helped develop the Title VI program update survey.

6. Procurement Process

This Resolution does not involve a procurement process.

7. Diversity

In developing proposed changes to the Title VI Program and Policies, TriMet sought input from a wide range of TriMet riders, the public, community based organizations, and the Transit Equity Advisory Committee (TEAC).

8. Financial/Budget Impact

There is no financial impact to making the proposed 2019 updates to TriMet’s Title VI Program.

9. Impact if Not Approved

TriMet's Title VI Program is required by federal statute, and by FTA regulations as a condition of receiving federal funding. The Title VI Program and Policies must be updated every three years and submitted to the FTA. The Board's approval is required prior to TriMet's submission of the 2019 Title VI Program Update to the FTA.

RESOLUTION NO. 19-09-69

**RESOLUTION NO. 19-09-69 OF THE TRI-COUNTY METROPOLITAN
TRANSPORTATION DISTRICT OF OREGON (TRIMET) APPROVING THE
2019 UPDATE TO TRIMET'S TITLE VI PROGRAM AND POLICIES**

WHEREAS, pursuant to Title VI of the Civil Rights Act of 1964, 42 U.S.C. §2000d *et seq* (the Act) and 49 CFR Part 21, the U.S. Department of Transportation (DOT) and the Federal Transit Administration (FTA) prohibit discrimination on the basis of race, color or national origin; and

WHEREAS, as a recipient of federal funds, TriMet is required to comply with the requirements of the Act and applicable implementing regulations; and

WHEREAS, pursuant to FTA regulations, TriMet is required to submit its Title VI Program to TriMet's Board of Directors (Board) for approval; and

WHEREAS, during its August 14, 2019, meeting, the Board was briefed on TriMet's updated Title VI Program and Policies, including but not limited to the major service change policy, disparate impact and disproportionate burden policies, and results of the agency's system-wide service standards and policies monitoring program, all of which are set forth in the 2019 Title VI Program Update, attached hereto as Exhibit A; and

WHEREAS, the Board has authority under ORS Chapter 267 to approve by resolution the 2019 Title VI Program Update; and

WHEREAS, after due consideration, the Board determined that TriMet's 2019 Title VI Program Update, attached hereto as Exhibit A, should be approved and submitted to the FTA;

NOW, THEREFORE, BE IT RESOLVED:

1. That TriMet's Title VI Program and Policies shall conform with applicable law.
2. That the Board hereby approves the TriMet's 2019 Title VI Program Update, attached hereto as Exhibit A, and authorizes its submission to the FTA.

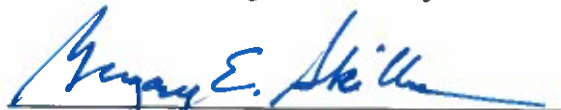
Dated: September 18, 2019

Presiding Officer

Attest:

Recording Secretary

Approved as to Legal Sufficiency:



Legal Department

Attachment B

TRIMET TITLE VI Complaint Form

Tri-County Metropolitan Transportation District of Oregon (TriMet)

1800 SW 1st Ave., Suite 300
Portland, OR 97201

503.962.3453
trimet.org

TITLE VI COMPLAINT FORM*

Title VI of the 1964 Civil Rights Act requires that “No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

The following information is necessary to assist us in processing your complaint. Should you require any assistance in completing this form or need information in alternative formats, please let us know.

Complete and return this form to TriMet, Attn: Civil Rights Title VI Investigator, 1800 SW 1st Ave., Suite 300, Portland, OR 97201.

1. Complainant's Name: _____

2. Address: _____

3. City: _____ State: _____ Zip Code: _____

4. Telephone Number (home): _____ (business): _____
Electronic Mail Address: _____

5. Are you filing this complaint on your own behalf? _____. If not, please supply the name and relationship of the person for whom you are complaining:

Please explain why you have filed for a third party:

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. _____

6. Which of the following best describes the reason you believe the discrimination took place? Was it because of your (check any box that applies):

a. Race:

b. Color:

c. National Origin:

7. What date did the alleged discrimination take place? _____

8. In your own words, describe the alleged discrimination. Explain what happened and what policy, program, activity or person you believe was discriminatory.

9. Have you filed this complaint with any other federal, state, or local agency, or with any federal or state court? Yes: No:

If yes, check each box that applies:

Federal agency

Federal court

State agency

State court

Local agency

10. Please provide information about a contact person at the agency/court where the complaint was filed.

Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Telephone Number: _____

11. Please sign below. You may attach any written materials or other information that you think is relevant to your complaint.

Complainant's Signature

Date

Attachment C

TRIMET TITLE VI Vehicle Notice

TriMet Respects Civil Rights

TriMet operates its programs without regard to race, color, national origin, religion, sex, sexual orientation, marital status, age or disability in accordance with applicable laws, including Title VI of the Civil Rights Act of 1964 and ORS Chapter 659A. To request additional information on TriMet's Title VI nondiscrimination requirements, or if any person believes they have been aggrieved by an unlawful discriminatory practice under Title VI or other applicable law and would like to file a complaint, contact us at 503-238-7433 (TTY 503-238-5811) or email administration@trimet.org.

TriMet tiến hành hoạt động các ban ngành của mình không phân biệt chủng tộc, màu da, nguồn gốc, tôn giáo, giới tính, khuynh hướng tình dục, tình trạng hôn nhân, tuổi tác hoặc khuyết tật sao cho phù hợp với pháp luật hiện hành, bao gồm Điều Khoản Thứ VI của Đạo Luật Dân Quyền Năm 1964 (Title VI of the Civil Rights Act of 1964) và Đạo Luật ORS Chapter 659A. Nếu quý vị cần thêm thông tin về các yêu cầu chống kỳ thị của TriMet dựa trên Điều Khoản Thứ VI, hoặc bất cứ ai cho rằng họ đã bị phiền toái vì những thủ tục kì thị bất hợp pháp như đã nêu trong Điều Khoản Thứ VI hoặc các điều luật khác của pháp luật hiện hành và muốn nộp đơn khiếu nại, xin liên lạc với chúng tôi tại số 503-238-7433 (số cho người khuyết tật 503-238-5811) hoặc gửi điện thư cho chúng tôi tại administration@trimet.org.

TriMet(트라이메트)의 모든 프로그램은 1964년 제정된 민권법 VI 편 및 ORS 659A를 포함한 관계 법령에 따라 인종, 피부색깔, 출신국, 종교, 성별, 성적성향, 혼인여부, 나이 또는 장애여부에 따른 차별없이 운영됩니다. TriMet (트라이메트)에서의 VI편 관련 차별 금지 규정에 관한 보다 자세한 자료가 필요하거나, VI편이나 기타 해당 법령에 따른 불법적 차별을 당하여 이의를 제기하고자 하는 분은 전화 503-238-7433 (TTY 503-238-5811)번 또는 전자우편 주소 administration@trimet.org 로 연락하여 주시기 바랍니다.

TriMet opera sus programas sin considerar raza, color, origen nacional, religión, sexo, orientación sexual, estado marital, edad o discapacidad de acuerdo con las leyes pertinentes incluyendo el Título VI del Acta de los Derechos Civiles de 1964, y ORS Capítulo 659A. Para más información sobre los requisitos no discriminatorios de TriMet bajo el Título VI, o si alguna persona piensa que fue agraviada por una práctica discriminatoria bajo el Título VI, y quiere presentar una queja contáctenos al 503-238-7433 (TTY 503-238-5811) o envíe un correo electrónico a administration@trimet.org.

Компания «TriMet» осуществляет свою деятельность без дискриминации по расовой принадлежности, цвету кожи, национальному происхождению, религии, полу, сексуальной ориентации, семейному статусу, возрасту, наличию инвалидности в соответствии со всеми применимыми законами, включая часть VI Акта о гражданских правах 1964 года и Главу 659A пересмотренных законов Орегона. Чтобы получить дополнительную информацию о недискриминации, или если кто-либо желает подать жалобу о незаконной дискриминации в соответствии с частью VI или любым другим применимым законом, пожалуйста, свяжитесь с нами по телефону 503-238-7433 (для слабослышащих – 503-238-5811) или напишите эл. письмо на адрес administration@trimet.org.

TriMet項目的運作按照適用法律不考慮種族、膚色、國籍、宗教、性別、性取向、婚姻狀況、年齡或殘疾狀況，其中包括1964年民權法案第VI章和ORS第659A章的規定。欲索取更多有關TriMet第VI章非歧視規定，或如果有人已經因為被非法歧視而感到屈辱而希望進行投訴，同時其符合第VI章或其它適用的法律，請聯系我們503-238-7433 (聽力障礙 503-238-5811) 或發電子郵件至administration@trimet.org。

Attachment D

TRIMET TITLE VI Administrative Office Notice

TriMet Respects Civil Rights

TriMet operates its programs without regard to race, color, national origin, religion, sex, gender identity, sexual orientation, marital status, age or disability in accordance with applicable laws, including Title VI of the Civil Rights Act of 1964, ORS Chapter 659A.403 and the Americans with Disabilities Act of 1990.

Civil Rights and Public Accommodations is **THE LAW**

TriMet's policy is to fully comply with federal and state laws designed to ensure protected groups who are entitled to enjoy the services of a public accommodation may do so on an equal basis and without discrimination. TriMet's policy is to provide programs and services in which all customers are able to utilize our transit system in a safe and respectful environment, free from discrimination, unfair treatment, or inappropriate conduct by TriMet employees, independent contractors, or other individuals.

Employees are expected to treat our customers respectfully and act professionally in all locations where TriMet work is performed.

TriMet Human Resources Manual Policy 6.14 Civil Rights and Public Accommodations



Attachment E

TRIMET Public Engagement Framework



TriMet Public Engagement and Outreach Framework May 2019

Purpose

TriMet recognizes that diverse values and opinions held both individually and as a group contribute to the quality of community life throughout the region. TriMet is committed to engaging the community it serves to ensure diverse public input and equity are part of its transparent policy and decision-making processes.

The general TriMet approach is to engage in a pro-active manner with diverse stakeholders via early, ongoing and meaningful communications. The public engagement process strives to include *all* interested and affected stakeholders – riders, members of vulnerable populations, members of diverse communities, elected officials, civic and business organizations, residents, and property owners to ensure they are provided opportunities for meaningful input.

In proposing any service changes, particularly changes that may result in diminished service, TriMet uses a variety of methods to communicate proposed changes and solicit feedback from the community. TriMet also engages in extensive community outreach in conjunction with large-scale projects to ensure that affected residences and businesses are fully informed of the impacts and benefits and are provided an opportunity for input in planning and implementation. On routes where there are a significant number of limited English proficient riders, TriMet staff will translate materials to ensure those riders can participate. After receiving public input, TriMet will determine whether to continue a service in its current form, change the service, or eliminate the service. Special attention is paid to the identification of any transit-dependent persons potentially affected by a route or service change.

Consistent with the requirements of Title VI, TriMet staff use GIS mapping software.

- Maps are created to identify affected low income, minority, and limited English proficient communities.
- Analysis is shared with TriMet staff working with affected communities to develop strategies to engage minority, low income and LEP populations, and to ensure proposed service changes are in compliance with the requirements of Title VI.

TriMet Demographic Profile

Low-income: TriMet defines low-income persons as someone whose household income is at or below 150% of the federal poverty level. Based on 2012-2016 US Census American Community Survey five-year estimates, 21.6 percent of the population within TriMet's service district are low-income under this definition.

According to the 2012-2016 ACS, 29 percent of the population within TriMet's service district is considered minority. This includes Hispanic or Latino (12.4 percent), Asian (7.5 percent), Black (3.4 percent), American Indian/Alaskan Native (.5 percent), Native Hawaiian/Pacific Islander (.5 percent), and Other Mixed Race (4.2 percent).

TriMet defines LEP by respondent's indication on the Census that they speak English "less than very well."

The US Census Bureau collects data about the ability to speak English as well as the language spoken at home via the American Community Survey (ACS) and allows for the identification of LEP languages falling within the “Safe Harbor” thresholds. The thresholds are 5 percent of total population or 1,000 individuals, whichever is less.

This data below was retrieved for the three-county region (Clackamas, Multnomah, and Washington counties) in which TriMet provides service.

Languages Spoken at Home	LEP Population Estimate	% of Total Population	% of LEP Population
Spanish	56,605	3.8%	46.1%
Vietnamese	13,598	0.9%	11.1%
Chinese (Cantonese, Mandarin)	9,892	0.7%	8.1%
Russian	6,656	0.5%	5.4%
Korean	3,259	0.2%	2.7%
Ukrainian	2,948	0.2%	2.4%
Arabic	2,336	0.2%	1.9%
Tagalog	2,095	0.1%	1.7%
Japanese	1,867	0.1%	1.5%
Mon-Khmer, Cambodian	1,658	0.1%	1.3%
Persian	1,159	0.1%	0.9%
Other (e.g., Romanian & Somali)	20,799	0.1%	16.9%
Total	122,872	8.3%	

Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Tables: 2012 - 2016 (5-Year Estimates).

Public Engagement Process

TriMet's public engagement process is based on nationally-established public participation core values:

1. Public participation is based on the belief that those who are affected by a decision have a right to be involved in the decision-making process.
2. Public participation includes the promise that the public's contribution will influence the decision.
3. Public participation promotes sustainable decisions by recognizing and communicating the needs and interests of all participants, including decision makers.
4. Public participation seeks out and facilitates the involvement of those potentially affected by or interested in a decision.
5. Public participation seeks input from participants in designing how they participate.
6. Public participation provides participants with the information they need to participate in a meaningful way.
7. Public participation communicates to participants how their input affected the decision.

A TriMet public engagement plan must include 12 critical elements:

A public engagement plan is required for any significant agency change as well as future planning objectives. Changes include those relating to fares, fare policy, service and capital projects.

A TriMet public engagement plan must include 12 critical elements:

1. Clearly defined purpose and objectives for initiating public dialogue. Shared understanding of the level and type of participation the plan is designed to generate.
2. Clear messages.
3. Specific identification of the potentially-affected public and other stakeholder groups.
 - a. Special effort placed on reaching underserved populations. These may be hard-to-reach groups such as low-income individuals, transit-dependent riders or members of minority communities. Strategies to reach will include going to where people live, work, go to school, practice faith, or shop; and providing culturally-competent materials.
4. Identification of possible barriers to participation among targeted populations and strategies to reduce these barriers.
5. Language needs identified to ensure participation of Limited English Proficiency (LEP) persons.
6. Use four-factor analysis to ensure access for LEP persons:
 - i. number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity or service;
 - ii. frequency with which LEP individuals come in contact with the program or service;
 - iii. nature and importance of the proposed changes to people's lives; and
 - iv. resources available to the recipient and costs.

7. Identification of engagement strategies and tactics.
8. Education/ information that results in accurate and full public understanding of options (as appropriate) and related issues.
9. Reflection of brand.
10. Info-gathering process outline.
11. Timeline and staff accountabilities.
12. Documentation process.

Before each plan is developed, the following levels of participation are reviewed to ensure clarity on what the agency is seeking. These levels and actions are based on best practices adapted from the International Association for Public Participation.

Possible Level of Participation from Stakeholders			
Inform Provide the stakeholder with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions.	Consult Obtain stakeholder feedback on analysis, alternatives and/or decisions	Involve Work directly with the stakeholder throughout the process to ensure that stakeholder concerns and aspirations are consistently understood and considered.	Collaborate Partner with the stakeholder in each aspect of the decision including the development of alternatives and the identification of the preferred solution.

Corresponding Commitment			
Inform We will keep you informed	Consult We will keep you informed, listen to and acknowledge concerns and aspirations, and provide feedback on how stakeholder input influenced the decision.	Involve We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how stakeholder input influenced the decision.	Collaborate We will look to you for advice in formulating solutions and include your advice and recommendations in the decisions to the maximum extent possible.

Public Participation Implementation

Strategies

This section will lay the framework for the public participation strategies to be used in fulfilling the project goals. This will include strategies for:

- Communication and raising awareness about the project.
- Education and discussion about the project and key community issues that could arise with the project.
- Gathering input about what people like and value, as well as what concerns them with the project.
- Gathering input on broader topics of concern related to the project.
- Deliberate possible approaches and changes that are appropriate to achieve the overall goal of the project.

Methods

Methods used to implement the engagement strategies will be designed to integrate the guiding principles of engagement. Potential methods include:

- Interviews to understand perceptions and attitudes for effective messaging and communication.
- Stakeholder interviews to understand detailed issues, concerns with, and possible approaches to reflect in the service changes.
- Listening sessions with the general public to understand likes and concerns about specific places and gather feedback on the public engagement plan.
- Small-group meetings with existing and new stakeholder groups to gather input on what they value and are concerned about on both specific places and related to the project itself
- Educational open houses to foster more in-depth learning and discussion.
- Booths and presentations at neighborhood and community events and presentations at existing meetings of community organizations

Tools and Platforms

Specific tools and platforms will be necessary to offer several ways to submit stakeholder feedback. These tools will be used to inform and engage the community about the project, which include:

- Website, including online engagement platform, surveys, etc.
- Social media (Facebook, Twitter, YouTube, Instagram, and others)
- Traditional media, including news releases, press conferences, media interviews and public service announcements
- Email and service alerts
- Traditional advertising in digital and print publications

Documenting Input and Improving the Process

The final section of the Plan will include the approaches that will be used to gather and document input provided by the public and the methods to help foster a two-way conversation in which questions are answered in a timely, transparent and informed fashion. Also included in this section will be the mechanisms for continually learning from what's working and what needs improvement in the public engagement process. It will include documentation methods for gathering quantitative and qualitative data about participation and strategies for process improvement. This information will be gathered by outreach staff and compiled in CiviCRM.

Attachment F

TRIMET Language Access Plan & Implementation Schedule

Language Access Plan

Ensuring meaningful access to TriMet programs and services for people with limited English proficiency.



September 18, 2019

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MESSAGE FROM THE GENERAL MANAGER

This year, TriMet turns 50!

We believe in a bright future for this region and are committed to being a leader in delivering safe, convenient, sustainable, and integrated mobility options necessary for our region to be recognized as one of the world's most livable places.

As we draw on our values of safety, inclusivity, equity, community and teamwork in all of our activities, our efforts to enhance our service to our Limited English Proficient (LEP) riders and all communities, align with the agency's mission to connect people with valued mobility options that are safe, convenient, reliable, accessible and welcoming to all.

Our updated Language Access Plan reflects our work and commitment to provide meaningful access to vital information and services for LEP stakeholders who use our services, facilities and programs, and whom we engage meaningfully.

Doug Kelsey
General Manager, TriMet

EXECUTIVE SUMMARY

On December 14, 2005, the United States Department of Transportation (DOT) published revised guidance for its recipients on the Implementation of Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency.” The Census definition of a Limited English Proficient (LEP) person is “...a person who speaks another language other than English at home and does not speak English well or not at all.”

As a public transit agency, the Tri-County Metropolitan Transportation District of Oregon (TriMet) serves a broad and diverse community. Providing simple access to information about our programs and services for all of our customers, has long been a priority for the agency. TriMet supports the goals of the DOT LEP Guidance and is committed to taking reasonable steps to provide meaningful access to LEP stakeholders who use our services, facilities, and programs, and who attend our meetings and events.

TriMet is committed to complying with the requirements of Title VI, Executive Order 13166, and DOT LEP Implementing Guidance. To prepare a useful Language Access Plan, TriMet conducted a LEP needs assessment as identified in Executive Order 13166. Key elements of the resulting Language Access Plan are as follows:

LEP Population Identification

LEP populations represent 8.3% of the total population aged five years and older within the TriMet district, or about 123,000 persons. Of the LEP populations, the largest group is the Spanish-speakers (46.1%), followed distantly by Vietnamese (11%), Chinese (8.1%), Russian (5.4%), and Korean (2.7%).

Analysis also showed that most of the urban LEP populations located themselves along well-served transit corridors. Comparatively, Spanish-speakers were more widely dispersed than the other language groups – forming both urban and semi-rural communities.

Language Access Plan Activities

After an extensive review of the of the existing Language Access Plan (LAP), the associated guidelines, and the needs of LEP populations, the LAP Update Committee recommends a continuation of the original two- tiered approach to meeting the needs of LEP communities in the TriMet district.

Tier One: Successful Activities to Continue

Tier One retained existing programs and activities designed to meet the language needs of regional LEP populations such as: telephone interpreters in virtually any language; multilingual printed materials and multilingual information on the TriMet web site; and continuing development of partnerships with community organizations that serve LEP populations.

Tier Two: Activities to deepen our focus

Tier Two identified new areas to deepen our focus to further the agency's goal of providing LEP customers with *meaningful access* to TriMet programs and services. These activities focus on four primary areas:

- 1. Language Assistance:** *How TriMet provides language assistance services by language.* This area relates to providing free language assistance for outreach documents and in-person services. It also guides the evaluation of which documents are vital for translation and the format(s) that most effectively communicate the messages contained in those documents.
- 2. Providing Notice of Language Assistance:** *How TriMet administers notice to LEP persons about the availability of language assistance.* This area provides guidance for providing notice of language assistance on outreach documents, on the system, and providing notice of the Title VI complaint process.
- 3. Monitoring and Updating the LAP:** *How TriMet monitors, evaluates, and updates the LAP.* This area provides guidance for monitoring and compliance of the LAP, maintaining definitions and standards for translation and interpretation services, and program research and administration.
- 4. Training Programs for Personnel:** *How TriMet trains employees to provide timely and reasonable language assistance to LEP populations.* This area provides guidance for the development of curriculum and the incorporation of LAP information into the employee environment in order to prepare all front line and other relevant staff to effectively engage and respond to LEP customers.

As a result of the LEP needs assessment, the agency instituted the *Language Access Plan* dedicated to mitigating language barriers that could prevent LEP customers from accessing agency programs and services. Due to the large size and dispersed nature of the Spanish-speaking LEP population, this community continues to be a main focus of targeted outreach efforts. This outreach program is housed in the Public Affairs Division with the Director of Transit Equity, Inclusion, and Community Affairs Department responsible for the overall program. The Manager for Multicultural Programs is assigned to help develop the program and carry out the day-to-day tasks.

BACKGROUND

Legal Basis for Language Assistance Requirements

1. Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), interpreted Title VI regulations declared by the former Department of Health, Education, and Welfare to hold that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination.
2. Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” Reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services. Federal agencies were instructed to publish guidance for their respective recipients in order to assist them with their obligations to LEP persons under Title VI. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

Department of Transportation LEP Guidance

The U.S. Department of Transportation (DOT) published revised LEP guidance for its recipients on December 15, 2005, which states that Title VI and its implementing regulations require that DOT recipients take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. The Federal Transit Administration published its LEP Guidance in its Circular 4702.1A “Title VI and Title VI Dependent Guidelines for FTA Recipients” on April 13, 2007, which requires recipients to develop an LEP implementation plan consistent with the provisions of Section VII of the DOT LEP guidance.

Language Access Plan Update Process

Building on the significant work that began in June 2005¹, a core group from the Transit Equity, Inclusion, and Community Affairs department took on the responsibility to update TriMet's LAP and Guidelines, to develop the 2019-2022 Implementation Schedule, and to update the Four Factor Analysis. Part of the update process included reconvening an inter-divisional workgroup in order to address federal requirements for assessing the needs and providing meaningful access to services to LEP populations, to restore agency commitment for its LEP program and to clarify staff roles and responsibilities.

In September 2018, staff members throughout the agency were selected in accordance with their position and were personally asked to participate. Specifically, the workgroup was to:

1. Complete a needs assessment of LEP persons in the district. The Four Factor Analysis (refer to Exhibit 2) assessment permitted staff to identify high concentrations and frequency of contact of LEP populations, to ascertain the nature and importance of TriMet services and programs as well as to determine if there were language barriers limiting the access of LEP persons to TriMet services.
2. Update the LAP and Implementation Schedule providing a framework for the provision of timely and reasonable language assistance to those with limited English proficiency who access TriMet's services and a method to evaluate and review the effectiveness of a LAP.
3. Report findings to management with recommendations and timelines for compliance with federal regulations.

Staff members from Transit Equity, Inclusion, and Community Affairs and Legal Services were tasked with developing a work plan and helping the inter-divisional workgroup complete the LAP update in a timely manner. To that end, a work plan with designated tasks and timelines was developed. This process allowed for a methodical, focused approach to the assessment; and defined deliverables, assigned tasks, and clarified roles and responsibilities. The following is a summary of the results from their work.

¹ Of note, TriMet received grant funding from the FTA Civil Rights Division to develop and implement a demonstration program for its LEP program. TriMet was the only transit authority in the nation to receive this grant funding.

LANGUAGE ACCESS PLAN

The Language Access Plan

After a review of the 2019 Four Factor Analysis and the programs 2019 LEP awareness survey, for the LEP populations and their needs, the LEP Workgroup recommended a two-tiered approach to meeting the needs of LEP populations in the TriMet district. *Tier One* retains successful programs and activities designed to meet the language needs of LEP populations. *Tier Two* outlines areas of focus to further the agency's goal of providing LEP customers with *meaningful access* to TriMet programs and services.

LEP Population Identification

LEP populations represent 8.3% of the total population aged five years and older within the TriMet district, or about 123,000 persons. Thirteen languages meet the LEP threshold. The largest proportion consists of Spanish-speaking LEP individuals (3.8% of the total population and 46% of the LEP population), followed by Vietnamese (0.9% of the total population and 11% of the LEP population).

The percentage breakdown for the top five languages is as follows:

- Spanish – 46.1%*
- Vietnamese – 11.1%
- Chinese – 8.1%
- Russian – 5.4
- Korean – 2.7%

TriMet language access program work has focused on the Spanish-speaking LEP population as it continues to be the largest LEP community in the region followed by the other top four languages. This approach is envisioned to continue while exploring new ways to engage and more effectively serve other LEP communities.

LEP Activities

Tier One: Successful Activities to Continue

Tier One retains existing programs and activities designed to meet the language needs of regional LEP populations such as: telephone interpreters in virtually any language; multi-lingual printed materials and multi-lingual information on the TriMet web site; and continuing development of partnerships with community organizations that serve LEP populations. The following activities will continue:

1. Provide telephone interpreters via customer service at 503-238-RIDE to assist LEP customers.
2. Print *How to Ride* brochures in the thirteen languages that meet the LEP threshold.
3. Post PDF files of How to Ride brochure on TriMet website.

4. Feature key transit information and online [Trip Planner](#) in Spanish on TriMet's website.
5. *Transit Tracker by Phone* information in Spanish via 503-238-7433.
6. Place target language ads in publications serving targeted language populations to demonstrate TriMet's commitment to full information, share current service-related announcements.
7. MAX (light rail system) announcements in both Spanish and English.
8. Spanish-language interface for Ticket Vending Machine (TVM) transactions.
9. Establish and nourish partnerships and continue to work closely with community organizations that serve LEP populations.
10. Civil Rights notification and complaint process in all safe Harbor languages on TriMet website.
11. Civil Rights Notification in all TriMet vehicles and transit centers in top five languages.
12. Print multi-lingual Hop Fastpass brochure.
13. Provide printable program application information for the Income-Based Fare Reduction program in all 13 threshold languages on trimet.org/lowincome.
14. Identification of LEP language needs as new transit projects are being planned.

Tier Two: Activities to Deepen our Focus

Tier Two identified new areas to deepen our focus to further the agency's goal of providing LEP customers with *meaningful access* to TriMet programs and services. These activities ensure continuity of our efforts by deepening our understanding of our commitment and responsibility. These activities focus on four primary areas:

- 1. Language Assistance:** *How TriMet provides language assistance services by language.* This area relates to providing free language assistance for outreach documents and in-person services. It also guides the evaluation of which documents are vital for translation and the format(s) that most effectively communicate the messages contained in those documents.
- 2. Providing Notice of Language Assistance:** *How TriMet provides notice to LEP persons about the availability of language assistance.* This area provides guidance for providing notice of language assistance on outreach documents, on the system, and providing notice of the Title VI complaint process.
- 3. Monitoring and Updating the LAP:** *How TriMet monitors, evaluates, and updates the LAP.* This area provides guidance for monitoring and compliance of the LAP, maintaining definitions and standards for translation and interpretation services, and program research and administration.

4. Training Programs for Personnel: *How TriMet trains employees to provide timely and reasonable language assistance to LEP populations.* This area provides guidance for the development of curriculum and the incorporation of LAP information into the TriMet employee environment in order to prepare all front line and other relevant staff to effectively engage and respond to LEP customers.

Implementation Calendar

In consideration of implementation factors including available resources and costs, the LAP utilizes a staggered implementation schedule over several years. The following calendar illustrates LAP activities, tasks, and implementation years.

LAP Update Schedule	Target Completion = X		
Task	FY '20	FY '21	FY '22
Language Assistance			
Create a standard LEP Handbill for use by outreach staff when providing notice of language assistance.	X		
Engage LEP communities in identifying Vital Information and ensuring that it is communicated in language.	X	X	X
Add LEP Materials for partners to order via trimet.org/dc.	X		
Conduct next round of LEP primary research survey and focus groups.			X
Incorporate Language code into Item Code footer for collateral.	X		
Develop a tool that walks staff through the steps to take when determining which languages should be served when translating for a project.	X		
Work with partners to include preferred language for listserve registration forms.	X		
Create updated versions of How To Ride videos in identified languages.	X		
Create file repository for translated documents and Creative Service request forms.	X		
Providing Notice of Language Assistance			
Develop and launch Language Assistance brand.		X	X
Update right to language assistance postings.	X		
Update the Notice of Civil Rights Complaint Process postings.	X		
Build out notice of meetings for different Customer Information Channels.		X	
Identify a way to provide notice of language assistance when using mass emails. (i.e.: .gov)		X	
Monitoring and Updating the LAP			
Build out LAP Program Team and staff roles.	X		

Clarify/formalize proof reading and quality control for translations.	X		
Clarify/formalize process for working with contracted interpreters and translators.	X		
Annual LAP Reviews	X	X	X
Build out process for ensuring language assistance and/or translated information is provided when necessary.	X	X	
Create a LAP Advisory Committee that contains community members who can inform our efforts to engage and support LEP riders.	X		
Build out a network of trusted individuals that are able to help review translated materials.	X	X	X
Training Programs for Personnel			
All frontline staff will be trained on how to use telephone interpretation.			X
Establish TriNET page for LEP resources that can be utilized by TriMet staff.	X		
All relevant staff will be trained in process for requesting translation and interpretation services.	X	X	X
Incorporate LEP resources into onboarding and orientation process for relevant staff.			X
Revisit LAP Training needs for staff.	X		
Update LAP trainings based off of needs assessment.		X	
Develop LEP Resources slides for monitors in breakrooms.	X		
Develop follow up training to LAP Training that is specific to different department staff and covers the resources available and how to use them.			X
Explore the creation of language based Employee Resource Groups.	X		
Campaigns			
Hop Fastpass	X	X	X
Low Income Fare	X	X	X
Southwest Corridor	X	X	X
Division Transit Project	X	X	X
Administrative Citation Process	X	X	X

PROGRESS SUMMARY

Major Milestones

In August 2018, TriMet's Transit Equity, Inclusion, and Community Affairs (TEICA) department formed a Language Access Plan Update Committee to assist in the task of updating the LAP to further the agency's effectiveness in providing meaningful access to LEP customers. The committee conducted outreach to LEP communities, convened meetings across TriMet divisions, updated LEP guidelines adopted in 2010, and developed an updated implementation timeline. Refer to Exhibit 1 for the full text of all Guidelines.

A 24-item survey instrument was translated into all 13 "safe harbor" languages. Surveys were distributed in-person at community meetings and events, direct email, and through targeted Facebook ads. The LEP engagement period started February 21, 2019 and ended May 17, 2019. A total of 962 surveys were collected. This represents one of the largest engagements of LEP persons in TriMet history. Refer to Exhibit 2 – 2019 Four Factor Analysis (Appendix A: Language Access Survey Report) to view the survey report.

Staff from the Transit Equity, Inclusion, and Community Affairs (TEICA) department distributed the surveys in-person by attending an immense number of community events and meetings. Through built partnerships with key organizations and established relationships with community leaders, TEICA staff received support from the following key organizations: Latino Network, Verde, El Programa Hispano, Centro Cultural, Consulado Mexicano, Immigrant & Refugee Community Organization (Slavic Advisory Board), and Asian Health and Services Center. Staff contacted other community organizations and public entities working with Spanish-speaking community members via telephone and via e-mail. TEICA staff shared the survey with key individual from the following organizations: Voz Worker Education Project, Consulado Mexicano, Mandos Mundo, Oregon Latino Action Agenda, Oregon Latino Health Coalition, OPAL, Educate Ya, American Friends Service Committee, Multnomah County Library, Multnomah County Health Department, Los Niños Cuentan, Gresham School District, Portland Public Schools ESL and Dual Language Immersion Programs, Hispanic Metropolitan Chamber of Commerce, Human Solutions, Central City Concern, Transition Projects, Virginia Garcia Clinic, Adelante Mujeres, Lara Media, Hispanic Pros, Rosewood Initiative, Archdiocese of Portland Ministerio Hispano, Portland ESL Network, et al.

TEICA staff made presentations and surveyed Spanish-speaking parents participating at Latino Network Juntos Aprendemos Programs at the following schools:

- Ventura Park Elementary
- Mill Park Elementary
- Shaver Elementary
- Cesar Chavez Elementary

- Glenfair Elementary
- Tualatin Elementary
- Harvey Scott Elementary
- Rigler Elementary
- Tigard Elementary
- Bridgeport Elementary

Staff also made presentations and surveyed participants in the Latino Network’s program Soñemos Juntos, Bienestar’s Equipo of Service Providers, El Programa Hispano Catolico, meetings at the Asian Health and Service Center and IRCO Senior Lunch as well as participants at a group gathering at the Baltazar Ortiz Center, Mill Park School Pantry, Madison High School Pantry, Shaver Food Pantry, and the Open Bible Harvest Share. Lastly, staff participated with the survey at Consulado Mexicano’s Ventatilla Financiera event, and at Cinco de Mayo in Portland.

Program Updates

- LEP outreach and language assistance has been provided to Vietnamese, Russian, Chinese, Korean, and Spanish-speaking LEP persons for issues related to fare changes, capital projects, and new service.
- In advance of migrating to an electronic fare (eFare) system, TriMet held discussion groups to assess potential impacts of such a change. One of these groups was held in Spanish, while two others were held in English with Spanish, Arabic, Somali, and Nepali interpretation.
- In early 2016, TriMet partnered with community-based organizations to conduct focus group meetings with Spanish, Vietnamese, Russian, and Nepalese speakers. Staff also hosted a booth at a community “Noche Latina” event. The purpose of this outreach was to help inform a vision for future bus service in the TriMet district. It included a questionnaire to get a better understanding of how participants use TriMet as well as their needs and priorities.
- As part of an effort to review practices surrounding enforcement of fare payment, TriMet partnered with several Community-Based Organizations to host listening sessions on the topic in summer 2016. Two of these listening sessions were held in Spanish, and another was in English with Vietnamese interpretation as most participants spoke Vietnamese.
- TriMet’s web page contains links to information in Spanish, Vietnamese, Russian, Chinese, and Korean. In addition, the landing page for Spanish now contains a Trip Planner in Spanish.

- Spanish speakers can also access TransitTracker (real-time arrival information) in Spanish by calling 503-238-7433 thereby accessing real time information on the next train or bus arrival. The Spanish “prompt” was moved to first place on the menu.
- All LEP customers can access language assistance by calling 503-238-7433. In the next year, customer service staff will explore the feasibility of having a dedicated telephone number for targeted languages to better serve LEP customers.
- TriMet provides notice to the public regarding its Title VI obligations and has notified the public regarding TriMet’s obligations to provide programs and services without regard to race, color or national origin. TriMet disseminates notice of its Title VI obligations and the right to file a Title VI complaint through the agency’s website, onboard notification on all transportation vehicles, transit centers, and TriMet’s downtown customer assistance office where passes and tickets are sold.
- TriMet has created a website in Spanish for Hop Fastpass, the electronic fare payment system. At myhopcard.com/es Spanish-speaking LEP’s can manage their electronic fares.
- The Division Transit Project includes targeted outreach, including project fact sheets and print advertisements for community events in Spanish, Vietnamese, Russian, and Chinese. A field office will open in late 2019, staffed by bi-lingual staff (English/Spanish) who will work closely with neighbors and businesses as construction begins.
- The Southwest Corridor Light Rail Project team includes bi-lingual staff who conduct outreach at community events. Project materials include fact sheets in Spanish, Swahili, and Arabic. Other outreach efforts include a webpage, survey, and social media targeted promotions in Spanish about the project’s Park & Ride and station access.
- TriMet has developed channel cards in Spanish for placement on all TriMet vehicles that communicate vital customer information for the following: Fare requirements, availability of TriMet customer assistance in Spanish, and the rules for riding. Planning is underway to develop similar channel cards in other targeted languages.
- In 2019, TriMet finalized updating the bilingual (Spanish/English) faceplates for Ticket Vending Machines to reflect Hop Fastpass and the electronic message interface.
- In 2018 TriMet established an administrative process to resolve fare citations and provided code enforcement personnel with a multilingual envelope (including the 13 languages that meet the LEP threshold) with the instruction to call 503-238-7433 to resolve the citation.
- TriMet established a Low Income Fare program and contracted with community organizations to extend its reach to culturally specific and LEP communities. All informational materials were created in either the top 5 languages or in all 13 threshold languages. Targeted media campaigns were conducted in Spanish, Russian, Vietnamese, and Chinese. In addition, TriMet hired an outreach staff

person that is able to communicate in Spanish, Russian, and Ukrainian adding strength to the LEP efforts.

- TriMet conducted multiple budget forums hosted by community-based organizations serving LEP communities through a Multicultural Contract in place that draws from a pool of agencies and community-based organizations serving communities of color and LEP communities.
- TriMet staff is working on updating TriMet's *How to Ride* videos and coordinating with non-profit organization to use in travel training session with LEP newcomers. These videos will be posted on TriMet's YouTube channel and shared through social media.
- TriMet contracted with Lara Media, C + C Consulting, and Asian Pacific Network of Oregon (APANO) to develop marketing concepts to promote Hop Fastpass in the Spanish speaking community and in the Vietnamese and Chinese community. The result of those efforts will be a greater investment on TV, Radio, and print ads in targeted languages in the coming years.
- Options to include Language Assistance notification signage are being explored on TriMet vehicles, bus stop signs, and transit centers.
- Multilingual channel cards on TriMet vehicles for Hop Fastpass will also be considered, as well as on bus benches and bus shelters.

LAP Program Material Examples



<https://trimet.org/meetings/hb2017/pdfs/public-transportation-improvement-plan.pdf>



Get Help With Your Transportation Costs

Reduced Fare Based on Income
You may be able to ride public transportation for less. TriMet's Reduced Fare gives you a more affordable way to get to work, school, shopping or services.

Who Qualifies?
18-65, Oregon Resident, less than twice the federal poverty level

Learn more and apply today
Visit trimet.org/lowincome or call 503-238-7433

Obtenga ayuda para sus costos de transporte

Tarifa reducida basada en los ingresos
Es posible que pueda usar el transporte público por menos. La tarifa reducida de TriMet le da una forma más asequible de ir al trabajo, a la escuela, ir de compras o a los servicios.

¿Quién califica?
18-65, residente de Oregon, menos del doble del nivel de pobreza federal

Conozca más y solicítela hoy
Visite trimet.org/lowincome o llame al 503-238-7433



고등 요금에서 도움을 받아보세요

소득 기준 할인 요금
당신은 더 적은 비용으로 공공 교통을 이용할 가능성이 있습니다. TriMet 할인 요금은 출근, 등교, 쇼핑, 또는 서비스를 이용할 때 지출에 도움을 드리기를 위한 것입니다.

어떤 사람에게 자격이 있나요?
18-65세, 오리건 주민, 연방 빈곤선 2배 미만

좀 더 알아보시고 오늘 신청하세요
trimet.org/lowincome에 방문 또는 503-238-7433에 전화

Отримання допомоги для користування транспортом

Зменшені тарифи з урахуванням доходу
Можливо, Ви зможете їздити на громадському транспорті дешевше. Зменшений тариф TriMet надає Вам більш доступний спосіб дістатися до роботи, школи, магазинів або пошлу.

Хто може прийняти участь?
18-65, резидент штату Орегон, трохи менше ніж удвічі перевищує федеральний рівень бідності

Дізнайтеся більше та подайте заявку сьогодні
Відвідайте веб-сайт trimet.org/lowincome або зателефонуйте за номером 503-238-7433



ទទួលបានជំនួយពាក់ព័ន្ធជមួយសេវាជីវិត

កាត់បន្ថយថ្លៃដំណើរការសម្រាប់អ្នកចំណូល
លក់ទាបជាងថ្លៃធម្មតាសម្រាប់ការដឹកជញ្ជូនសាធារណៈជាមួយថ្លៃដាច់ខាត។ ការបញ្ចុះតម្លៃសម្រាប់អ្នកចំណូលទាបរបស់ TriMet ផ្តល់ឱកាសឱ្យអ្នកដឹកជញ្ជូនសាធារណៈដើម្បីទៅទីកន្លែងការងារ ការសិក្សា ការទិញទំនិញ និងសេវាផ្សេងៗ។

តើនរណាគួរបានជំនួយ?
ពលរដ្ឋដែលរស់នៅរវាង 18-65 ឆ្នាំ និងមានចំណូលសរុបតិចជាងពីរដងនៃតម្លៃកម្រិតជីវិតរបស់សហរដ្ឋអាមេរិក។

ស្វែងយល់បន្ថែម និងដាក់ពាក្យសុំថ្លៃថ្នូរ៖
trimet.org/lowincome ឬទូរស័ព្ទទៅលេខ 503-238-7433

در هزینه های حمل و نقل خود صرفه جویی کنید
تخفیف کرایه بر مبنای درآمد
اگرچه سفر ارزانتر یا ناگهان حمل و نقل عمومی میسر است.
طرح تخفیف کرایه TriMet را مقرون به صرفه تری برای رفت و آمد به محل کار، مدرسه، مراکز خرید یا خدمات پیش پای شما می گذارد.

افراد واجد شرایط؟
18-65 سال ساکن اورگن، درآمد کمتر از دو برابر آستانه فقر فدرال

اطلاعات بیشتر و ثبت نام
به آدرس trimet.org/lowincome رجوع کنید یا با شماره 503-238-7433 تماس بگیرید.

TRI MET
Respects Civil Rights

TriMet respeta los derechos civiles
TriMet Tôn trọng Dân quyền
TriMet 尊重公民权利
TriMet уважает гражданские права
TriMet은 시민권을 존중합니다
TriMet поважає громадянські права
TriMetは市民の権利を尊重します
Iginagalang ng TriMet ang Karapatan ng Mamamayan
TriMet respectă drepturile civile ale cetățenilor
TriMet تحترم الحقوق المدنية
TriMet احترام 市民 權利
TriMet waxay Tixgellisaa Xuuqaha Madaniga ah



RULES FOR RIDING

- Don't threaten or intimidate riders or operators.
No amenace ni intimide a otros pasajeros ni al conductor.
- In the priority seating area, move for seniors and people with disabilities.
En el área de prioridad, ceda el asiento a personas de edad avanzada y personas con discapacidad.
- Don't be so loud that you disturb others.
No haga ruidos que molesten a los demás.
- Don't block the aisles or doors.
No bloquee los pasillos o puertas.
- Unless it's a service animal, your pet must be kept in a carrier.
Su mascota debe viajar en una jaula a menos que sea un animal de servicio.
- Valid and correct fare is required.
Se requiere boleto apropiado y válido.
- No eating on board, but you can bring food or drinks in closed containers.
No se permite comer a bordo. Puede transportar comida o bebidas en recipientes cerrados.

Proposed Route Change 79 Clackamas/Oregon City



We recently proposed a couple changes — first, we want to reroute Line 79 to 82nd Drive, I-205 and Washington Street. This would provide a more direct trip and eliminate service on Strawberry Lane.

Second, we want to add a new route between Clackamas Town Center and Oregon City Transit Center via Thiessen, Webster, Arlington and McLoughlin (see map).

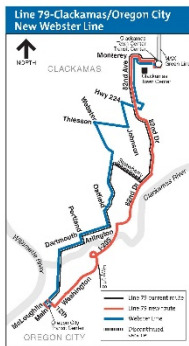
Before we finalize this plan, we want to know what you think. Weigh in at trimet.org/plan or call 503-238-7433, open 7:30 a.m. - 5:30 p.m., every day. Comments due by March 4.

Propuesta de cambio de ruta 79 Clackamas/Ciudad de Oregon

Recientemente propusimos un par de cambios: en primer lugar, queremos redirigir la ruta de la Línea 79 hacia 82nd Drive, I-205 y Washington Street. Esto facilitará un viaje más directo y eliminará el servicio en Strawberry Lane.

En segundo lugar, queremos agregar una ruta nueva entre el Clackamas Town Center y el Centro de Tránsito de la ciudad de Oregon hacia Thiessen, Webster, Arlington y McLoughlin (ver mapa).

Antes de terminar este plan, queremos saber lo que piensa. Envíe sus opiniones a trimet.org/plan o llámeme al 503-238-7433, abierto todos los días, de 7:30 a.m. a 5:30 p.m. Aceptaremos comentarios hasta el 4 de marzo.



TRIMET



"TriMet ha sido el mejor trabajo que he tenido. Se lo recomiendo a quien disfrute manejar, y esté buscando un cambio de carrera."

Gana más de \$60,000 al año con excelente beneficios, y disfruta del paisaje.

Evento de Contratación de Chofer de Autobús*

Jueves, Junio 20 • 2 a 6 PM

Sesión Informativa 2:30 a 3:30 PM

Sesión sobre Oportunidades Laborales 4 PM a 5 PM

Oregon Convention Center

777 NE Martin Luther King Jr. Blvd

**El puesto requiere dominio del inglés, ya que los exámenes y el entrenamiento se dan en inglés.*

TRIMET
trimet.org/driveforus

*Met es un empleador con igualdad de oportunidades, y con el compromiso de desarrollar una organización que valga y sea sensible a las necesidades de nuestro diverso comunidad. Incluyendo a los veteranos, los que son y los que no son con discapacidades.

Hop Fastpass®: tu tarjeta para viajar en TriMet, C-TRAN y Portland Streetcar.

- ✓ Simplemente toca el lector con tu tarjeta Hop o teléfono* para pagar tu pasaje
- ✓ Obtén pases automáticamente cuando usas tu tarjeta
- ✓ Recarga desde cualquier parte utilizando el sitio web o la aplicación

*Puedes comprar un pasaje para Clackamas en internet, a través de la app TriMet, Oregon City y Streetcar Hop, o con una tarjeta virtual Hop en la app Hop.

CTRAN • TRIMET • PORTLAND STREETCAR

Para saber más u obtener una tarjeta, visita myhopcard.com/es

1-844-694-6722

For language assistance, call the nearest interpreter. Llamé al número de ayuda al cliente.

hop es tu nueva tarjeta para viajar.



Service Alert

Stop Change

Beginning Sunday, March 3, new Line 31-Webster Rd, with service to Clackamas Town Center, will also serve this stop.



Для службы языковой поддержки 503-238-7433
Si necesita interprete, llame al 503-238-7433

TRIMET



trimet.org
503-238-RIDE (7433)

TRIMET

English • Español • Tiếng Việt • Русский
中文 • العربية • Română • 한국어 • 日本語
Tagalog • Igbo • Somali • Українська • فارسی

Fares and how to ride
Tarifas y cómo viajar
Giá vé & cách đi xe Bus, MAX
Плата за проезд и как пользоваться
قيمة التذاكر و دليل المواصلات
Prețul călătoriei și cum să folosești sistemul de transport
요금과 탑승 방법
料金と乗車方法
Pamasahe at kung paano sumakay
ថ្លៃសំបុត្រ, របៀបដំឡើងប្រាក់
Noolka iyo sida loo raaco
Плата за проїзд та як користуватися
عنوان جلد چگونگی استفاده و سابلقبه

Effective
Sept. 2, 2018

Para resolver esta infracción, visite trimet.org/citation o llame al 503-238-7433.

Để giải quyết giấy phạt này, xin vào trang mạng trimet.org/citation hoặc gọi số 503-238-7433

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Pentru soluționarea unei citații, vizitați trimet.org/citation sau sunați la nr. 503-238-7433.

لحل هذا الانتهاك، trimet.org/citation، أو اتصل برقم 503-238-7433 لتفضل بزيارة

ដើម្បីដោះស្រាយដីកាពារ: សូមចូលមើលគេហទំព័រ trimet.org/citation ឬហៅទៅសំឡេងទៅកាន់លេខ 503-238-7433។

مراجعة کنید یا با شماره 503-238-7433 تماس بگیرید. trimet.org/citation برای حل و فصل این احضاریه به

Si loo xalliyo ka so xigashadaani, booqo trimet.org/citation ama wac 503-238-7433.



This envelope contains a citation for not having a valid TriMet fare.

You may be eligible to avoid court and receive a reduced penalty by resolving this citation directly with TriMet. To take advantage, complete one of the options in the green box within the listed time. After 90 days, the yellow box contains your only option.

Here are your options to resolve this citation with TriMet

WITHIN 45 DAYS

A. Appeal your citation

You may be eligible for an appeal hearing to demonstrate that you had the correct fare. Appeals must be requested within **45 days** of receiving this citation. If the citation is not dismissed after the appeal, you can still resolve it in one of the ways below within **90 days** of issuance of the citation. Visit trimet.org/citation for details.

B. Pay a fine

- \$75 (1st offense)
- \$100 (2nd offense)
- \$150 (3rd offense)
- \$175 (4th offense and beyond)

Within **90 days** pay the reduced fine listed above.

Visit trimet.org/citation or call 503-238-RIDE (7433) for payment options. Note: Your citation will be available to pay online within 5-7 days.

C. Perform community service

- 4 hours (1st offense)
- 7 hours (2nd offense)
- 12 hours (3rd offense)
- 15 hours (4th offense and beyond)

Community service hours must be completed and approved by TriMet within **90 days**. See trimet.org/citation for details.

D. Enroll in our low-income fare or honored citizen programs

If you successfully sign up for our low-income fare or honored citizen program and load \$10 on your HOP card within **90 days**, your fine could be reduced to zero upon verification by TriMet. Visit trimet.org/citation or call 503-238-RIDE (7433) to see if you qualify and for additional details.

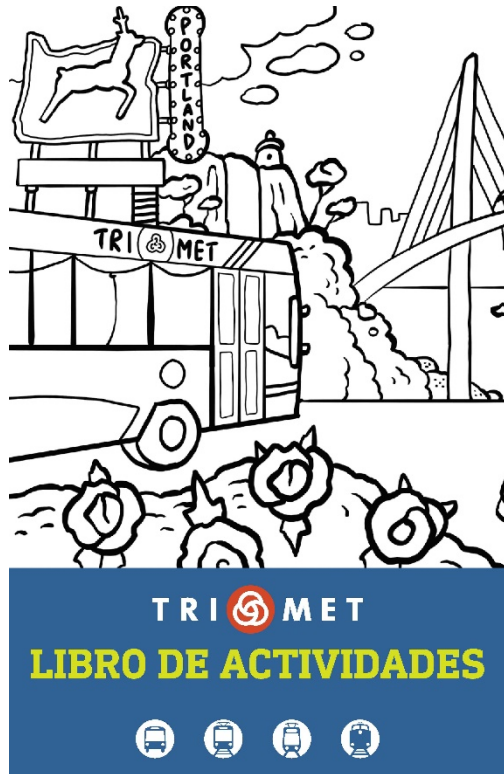
AFTER 90 DAYS

If you do not resolve this citation within 90 days

After **90 days**, you **must** resolve this citation in court by following the instructions on the enclosed citation. Your fine will likely increase. Once filed in court, the presumptive fine is \$175 and the maximum fine is \$250.

SOURCE: ORS 267.153; TriMet Code 29.35

190084-10M-2/19



"TriMet ha sido el mejor trabajo que he tenido. Se lo recomiendo a quien disfrute manejar, y esté buscando un cambio de carrera."

Gana más de \$60,000 al año con excelente beneficios, y disfruta del paisaje.

Evento de Contratación de Chofer de Autobús*

Jueves, Junio 20 - 2 a 6 PM

Sesión Informativa 2:30 a 3:30 PM

Sesión sobre Oportunidades Laborales 4 PM a 5 PM

Oregon Convention Center

777 NE Martin Luther King Jr. Blvd

*El puesto requiere dominio del inglés, ya que los exámenes y el entrenamiento se dan en inglés.



*El empleo es un beneficio de la compañía. Se requiere un nivel de inglés suficiente para manejar un autobús y conducir un vehículo. Se requiere un nivel de inglés suficiente para manejar un autobús y conducir un vehículo. Se requiere un nivel de inglés suficiente para manejar un autobús y conducir un vehículo.

EXHIBIT

1. LAP Guidelines
2. Four Factor Analysis

Exhibit 1: LAP Guidelines

Guidelines Index

#	Guideline	Purpose
1	Language Assistance	How TriMet provides language assistance services by language
1A	Use of In-person Interpreter Services at Public Meetings	To provide, at no cost, in-person interpreter services upon request for public meetings, and important events.
1B	Written Translation of Vital Documents	To implement a procedure to provide for written translation of vital documents.
1C	Customer Information Channels	To provide information about TriMet services in multiple languages using the Four Factor Analysis to determine need.
1D	Culturally-Responsive Outreach	To develop and implement culturally-competent outreach to increase awareness of and access to TriMet services and programs.
2	Providing Notice of Language Assistance	How TriMet provides notice to LEP persons about the availability of language assistance
2A	Notice of Right To Language Assistance, Outreach Document	To provide notice of right to language assistance, at no cost, on non-vital yet important outreach documents. Examples may include project fact sheets, service planning open house notices, and other open house materials.
2B	Notice of Right to Language Assistance on the System	To identify areas where TriMet can provide notice of “right to language assistance,” at no cost, to LEP persons.
2C	Notice of Civil Rights Complaint Procedures	To provide information in multiple languages about TriMet’s complaint procedure.
3	Monitoring & Updating the LAP	How TriMet monitors, evaluates, and updates the LAP
3A	Language Skills Competency Standards for Interpreters and Translators	To consistently apply competency standards for interpreters and translators.
3B	Primary Research	To obtain feedback from Spanish-speaking persons on travel behaviors and patterns, fare payment, and demographics. Additional languages that meet the “safe harbor” threshold are accounted for to assess the ability to speak English.
3C	LAP Monitoring & Compliance	To monitor the effectiveness of TriMet’s Language Access Plan on an ongoing basis.
4	Training Programs for Personnel	How TriMet trains employees to provide timely and reasonable language assistance to LEP populations.
4A	Curriculum Development	To ensure that TriMet employees know their obligations to provide meaningful access to information and services for LEP persons.
4B	Incorporate LAP Information Into Employee Environment	To establish a procedure to incorporate LEP Plan information into the employee environment.

1A: Use on In-person Interpreter Services at Public Meetings

Proposed: 3/10/09

Adopted: 12/1/10

Updated: 2019

PURPOSE

To provide, at no cost, in-person professional interpreter services upon request for public meetings, and important events.

PRACTICE

Public meetings are an opportunity for the public to learn about, and at designated times, participate in the agency's decision-making process. Subject to application of the Four Factor Analysis, the agency will take reasonable steps to provide Limited English Proficiency (LEP) community members with the opportunity to participate in agency decisions in accordance with established agency procedures. These steps will include:

1. Provide notification that interpretive services are available for meetings on all promotional material; and
2. Provide such services when request is made 48 hours in advance of the meeting.
3. When possible, arrange phone translation at meetings when LEP needs are presented without prior notification less than 48 hours in advance.

RESPONSIBILITY

General Manager's Office, Legal Services, Community Affairs, Transportation Planning, and Communications & Marketing

APPROACH

In the future as in the past, this practice is guided by application of the Four Factor Analysis whereby there is a review of:

1. The number and proportion of eligible LEP constituents;
2. The frequency of LEP individuals' contact with the program;
3. The nature and importance of the program; and
4. The resources available, including costs.

PROCEDURE

Call-In Requests

All Outreach and Customer Service staff will be trained on how to use telephone interpretation services and other language assistance resources.

As determined after application of the Four Factor Analysis, when publicizing public meetings, the agency should provide the following information in the key languages:

“To request interpreter services for TriMet meetings, please call 503-238-7433 48 hours in advance of this meeting.”

Staff will immediately submit the request to the coordinating department, who will hire the appropriate interpreter for the meeting.

Prior to utilizing an interpreter:

1. The presenters should schedule a 15 minute briefing with the interpreter. This gives TriMet staff a chance to train the interpreter on specific terminology, procedure, and themes presented.
2. The presenters will discuss the presentation and check for any culturally relevant information as well as receive training on how to communicate effectively through an interpreter, ensuring successful use of the service.

Drop-Ins

To better assist LEP community members who come to public meetings and **have not requested an interpreter in advance:**

1. Staff should provide the guest with the LEP handbill developed by the TEICA division – provided in identified languages –that outlines procedures for receiving information in another language (verbal or written).
2. The handbill also will provide information on how to request interpreter services and how they can testify at public meetings.
3. Staff should prominently display the following sign at registration in the key languages:

“To access information from this meeting, please call (503) 238-7433.”

Targeted Public Meetings: When TriMet is hosting public meetings in a particular geographic area with a known, significant LEP population:

1. Meeting notices should be produced and distributed in the key language(s) encouraging area residents to: a) participate; and b) request interpreter services 48 hours in advance of the meeting.
2. TriMet will provide at least one qualified interpreter at these meetings who is fluent in the designated language(s).
4. The agency will prioritize the use of bilingual facilitators instead of using interpreters, when possible in informal settings. The use of family members or friends to act as interpreters when a qualified interpreter is unavailable is strongly discouraged.

1B: Written Translation of Vital Documents

Proposed: 3/10/09

Adopted: 12/1/10

Updated: 2019

PURPOSE

To implement a procedure to provide for written translation of vital documents.

PRACTICE

The agency will take reasonable steps to ensure that Limited English Proficiency (LEP) persons have meaningful access to TriMet programs and services, with respect to identification and written translation of vital documents, as outlined in this Guidance.

RESPONSIBILITY

Marketing, Community Affairs, Customer Experience and Legal Services

APPROACH

This Guideline assumes that to be truly useful, translated materials must communicate clearly and in a culturally appropriate way with the audience. The documents must – to the greatest extent possible – preserve accuracy in meaning, and not be overly-burdened by legalistic terms and technical vocabulary.

In the future as in the past, the determination as to whether to provide a written translation of a vital document is guided by application of the Four Factor Analysis whereby there is a review of:

1. The number and proportion of eligible LEP constituents;
2. The frequency of LEP individuals' contact with the program;
3. The nature and importance of the program; and
4. The resources available, including costs.

Whether or not a document is deemed to be “vital” may depend on the importance of the program, information, encounter or service involved, and the consequence to the LEP person if the information is not accurate or timely. A “vital document” may include information which is critical or required to participate in or benefit from an agency program or activity. For instance, applications for bicycle parking should not generally be considered vital, whereas access to application forms to qualify for accessible transit services like LIFT could be considered vital.

Classifying a document as vital or non-vital is sometimes difficult, especially in the case of outreach materials like brochures or other information on rights and services. Awareness of rights or services is an important part of “meaningful access,” as lack of awareness may effectively deny LEP individuals meaningful access. Where the agency is engaged in community outreach efforts in furtherance of its programs and activities, the needs of

populations frequently encountered or affected by the program or activity should be regularly assessed to determine whether certain critical outreach materials should be translated.

PROCEDURE

All requests for written translations of vital documents shall be submitted to The Multicultural Programs Manager for handling in accordance with the above Guideline. The Multicultural Programs Manager will chair a standing LAP Program Team. This committee will meet quarterly and be comprised of representatives from Capital Projects, Creative Services, Customer Service Customer Information, Operations, and Legal Services to identify agency vital documents and assess LEP written translation services under this Guideline.

Once a determination is made to translate and in what language(s), the requesting party will:

1. Submit request to Creative Services to have the information translated, designed and printed and/or posted to trimet.org.
2. Submit work product and Creative Service Request form to LAP Program Team.
3. LAP Program Team will review submissions quarterly to ensure quality and standards are met, and to provide feedback on any part of the publication process when applicable.

1C: Customer Information Channels

Proposed: 3/10/09

Adopted: 12/1/10

Updated: 2019

PURPOSE

To provide information about TriMet services in multiple languages using the Four Factor Analysis to determine need.

PRACTICE

TriMet's customer information will be made available to Limited English Proficiency (LEP) customers through the most effective communication channels per Title VI, Prohibition Against National Origin Discrimination Affecting LEP Persons. In order to avoid discrimination on the grounds of national origin, the agency will take reasonable steps to ensure that LEP customers receive information in the language necessary to allow them meaningful access to programs and services, free of charge.

RESPONSIBILITY

Marketing and Customer Service

APPROACH

In the future as in the past, the determination of the most meaningful and effective communication channel is guided by application of the Four Factor Analysis whereby there is a review of:

1. The number and proportion of eligible LEP constituents;
2. The frequency of LEP individuals' contact with the program;
3. The nature and importance of the program; and
4. The resources available, including costs.

PROCEDURE

The Project Manager, in concert with the Multicultural Programs Manager, will make the final determination of what customer information will be translated based on the Four Factor Analysis and recommendation of LAP Program Team. Translations should be considered for these basic customer information materials:

1. Fares and How to Ride brochure including information about how to ride the system (bus, light rail, commuter rail and streetcar), fares, and basic riding rules.
2. Major service change Service Alerts.
3. Audio scripts for 238-7433 menu selection to help limited English customers in receiving needed customer service.
4. Audio scripts for ticket vending machines (TVM) to assist LEP customers in purchasing tickets and passes.

INFORMATION CHANNELS

The following information channels will be considered when determining which messages are to be prepared for LEP customers:

- Service alerts
- Print media-public notice and display ads
- Out-of-home media-transit ads, bus benches and shelters, bill boards
- Broadcast media-radio and TV
- Electronic media - website, social media, email, blogs, smart phone apps, etc.
- On street displays/posters
- In-person customer outreach
- Digital displays at MAX platforms and partner locations

1D: Culturally-Responsive Outreach

Proposed: 4/28/09

Adopted: 12/1/10

Updated: 2019

PURPOSE

Develop and implement culturally-responsive outreach to increase awareness of, and access to, TriMet services and programs.

PRACTICE

Determine language needs of target audience to develop appropriate communication tools, approach and message.

RESPONSIBILITY

Multicultural Programs Manager, Marketing Department, PIOs, TEICA

APPROACH

The determination of the most meaningful, culturally-responsive outreach measures will be guided by the outcome of the Four Factor Analysis whereby there will be a review of:

1. The number and proportion of eligible Limited English Proficiency (LEP) constituents;
2. The frequency of LEP individuals' contacts with the program;
3. The nature and importance of the program; and
4. The resources available, including costs.

PROCEDURE

1. Develop culturally appropriate materials in the target language.
 - a. Print materials
 - b. Websites and/or webpages
 - c. Video and Audio
2. Test materials with key constituencies.
 - a. Utilize methods such as focus groups or peer review to test materials before going to production.
 - b. Use TriMet Staff and Community Partners in TEAC when other more comprehensive review and feedback processes are not possible.
 - c. Periodically host a focus group to review translated materials.
3. Establish relationships and partner with key community leaders and organizations of target audience.
4. Individual one on one meetings, telephone calls, and e-mail messages to target leadership.
5. Visit/participate in scheduled community events of target audience to promote message.

6. Target outreach to key gathering places such as churches, schools, community colleges, libraries, and social service and community activist organizations.
7. Promote message with community media—create earned media opportunities.
8. Use TriMet vehicles and properties to display message in target language on lines that run through areas with a high percent of residents who speak that language.
9. Develop print, radio, social media, and television ads in target language.
10. Use TriMet personnel that reflect target audience to promote message.
11. Work with culturally specific contractors to engage LEP communities.

2A: Notice of Right to Language Assistance, Outreach Documents

Proposed: 3/10/09

Adopted: 12/1/10

Updated: 2019

PURPOSE

To provide notice of right-to-language assistance, at no cost, on outreach documents. Examples may include project fact sheets, webpages, service planning open house notices, and other open house materials.

PRACTICE

TriMet produces hundreds of documents that may be of interest to Limited English Proficiency (LEP) community members. Documents should include a notice in all LEP population languages identified in the Four Factor Analysis alerting customers that the document is available to be translated upon request in accordance with this Guideline. TriMet will develop a collection of standardized language assistance notices on TriNet for use when creating new outreach materials and communications.

RESPONSIBILITY

Marketing & Outreach Services, Community Affairs, and Communications

APPROACH

In the future as in the past, this practice is guided by the outcome of the Four Factor Analysis whereby there is a review of:

1. The number and proportion of eligible LEP constituents;
2. The frequency of LEP individuals' contact with the program;
3. The nature and importance of the program; and
4. The resources available, including costs.

PROCEDURE

1. The Project Manager, working with the Multicultural Programs Manager, will make the final determination if a document warrants including the Language Assistance notification.
2. Documents should include a box with following information translated into languages identified in the Four Factor Analysis – *“For Language Assistance call 503-238-7433.”*
3. Document name, date, and language code (if applicable) will be noted in the footer of the last page to aid the Customer Service Department in efficiently identifying the document.

4. When the LEP customer calls Customer Service, staff will work with the caller and (when necessary) on-call interpreters to determine whether a verbal or a written response is desired.
5. Customer Service staff will then submit the request to appropriate department for processing.
6. If translation is required, every effort will be made to provide a translated document within 10 working days of the request.

Example of format for Language Assistance notice in the identified Languages:

Spanish: Si necesita interprete, llame al 503-238-7433

Vietnamese: Nếu cần trợ giúp về thông dịch xin gọi 503-238-7433

Chinese (simplified): 如需语言帮助请致电 : 503-238-7433

Russian: Для службы языковой поддержки 503-238-7433

Korean: 언어 통역이 필요하시면, 503-238-7433 으로 전화 하시면 됩니다

2B: Notice of Right to Language Assistance on the System

Proposed: 3/10/2009

Adopted: 12/1/10

Updated: 2019

PURPOSE

Identify areas where TriMet can provide notice of “right to language assistance,” at no cost, to Limited English Proficiency (LEP) persons.

PRACTICE

Title VI, Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons: In order to avoid discrimination on the grounds of national origin, the agency will take reasonable steps to ensure that LEP customers receive the language assistance necessary to allow them meaningful access to programs and services, free of charge.

RESPONSIBILITY

Marketing & Outreach Services and Customer Experience

APPROACH

In the future as in the past, this practice is guided by the outcome of the Four Factor Analysis whereby there is a review of:

1. The number and proportion of eligible LEP constituents;
2. The frequency of LEP individuals' contact with the program;
3. The nature and importance of the program; and
4. The resources available, including costs.

PROCEDURE

The agency will ensure that a translated notice of the right to language assistance is posted in an easily visible location at all relevant venues.

Based on the Four Factor Analysis and LAP Program Team recommendations, examples of LEP notification points to consider include venues likely to be patronized by a high volume of LEP customers looking for TriMet information:

1. TriMet customer service offices and ticket outlets
2. Signs and handouts available in vehicles and stations
3. Outreach documents
4. Agency website
5. Postings at Community-Based Organizations (CBOs) partnering with the agency made available to partners via trimet.org/dc
6. Notices in non-English community newspapers

7. Announcements on non-English radio stations
8. Information tables at local events

2C: Notice of Civil Rights Complaint Procedures

Proposed: 3/10/2009

Adopted: 2011

Updated: 2019

PURPOSE

Provide information in multiple languages about TriMet's complaint process.

PRACTICE

TriMet's complaint process will be made available to Limited English Proficiency (w) constituents upon request and in key public locations per Title VI.

RESPONSIBILITY

Marketing; Customer Experience; Legal Services; Transit Equity, Inclusion, and Community Affairs

APPROACH

In the future as in the past, the determination as to Title VI notice locations and specific messaging formats is guided by application of the Four Factor Analysis whereby there is a review of:

1. The number and proportion of eligible LEP constituents;
2. The frequency of LEP individuals' contact with the program;
3. The nature and importance of the program; and
4. The resources available, including costs.

PROCEDURE

Based on the LAP Program Team recommendations and the outcome of the Four Factor Analysis the following locations were identified as the best places to post information about TriMet's complaint process for LEP persons:

1. TriMet's external website in the language of key LEP communities.
2. The TriMet Ticket Office (TTO) in downtown Portland, Oregon, where significant numbers of LEP persons seek TriMet information.
3. Onboard notification on transportation vehicles and transit centers.
4. TriMet Lost and Found
5. TriMet Administrative Offices
6. IDP managed locations

3A: Language Skills Competency Standards for Interpreters and Translators

Proposed: 3/10/2009

Adopted: 12/1/10

Updated: 2019

PURPOSE

Consistently apply competency standards for interpreters and translators.

PRACTICE

Interpretation and translations arranged by TriMet will be performed by contracted vendors and/or individuals whose competency has been established based on contract awards through a request for proposal (RFP) process. .

RESPONSIBILITY

Members of the Source Evaluation Committee (SEC), Members were selected from the following departments: Marketing, Customer Services, ATP, Community Affairs, and Planning and Policies

APPROACH

This task will be accomplished using a combination of methods to provide reliability, flexibility, and cost savings:

1. Work with qualified and certified professional organizations offering services in the fields of interpreting and translation.
2. Utilize bilingual TriMet staff members to check the quality of work produced, when possible.
3. Evaluate and apply key elements from successful programs from state and local governments and healthcare providers.
4. When possible, use local translators and ask that the same individuals be assigned to our projects each time in order to build the contextual knowledge needed to accurately translate our materials.
5. Incorporate language into contracts requiring vendors to certify their proficiency in target languages.

PROCEDURE

1. Work with the contractors to ensure that all interpreters and translators working for TriMet meet the following standards:
 - a. Communicate fluently – verbally and in writing – in both English and the primary language of the Limited English Proficiency (LEP) individual.

- b. Demonstrate cultural understanding of the LEP customer served.
 - c. Accurately and impartially interpret and/or translate to and from such languages and English.
 - d. Demonstrate an understanding of the role and the ethics associated with being an interpreter or translator.
2. TriMet will conduct “spot checks” on translations and for limited interpreting services, bilingual TriMet staff may provide assistance.
 3. In the event that translation or interpretation services are not up to competency standards TriMet staff will:
 - a. Notify the vendor of their error and give a reasonable opportunity to fix the error.
 - b. Document the error.
 - c. If more than 2 errors are made for a given language then TriMet Staff will move to a secondary contractor.

3B: Primary Research

Proposed: 11/16/18

Updated: 2019

PURPOSE

To obtain feedback from Limited English Proficiency (LEP) riders on travel behaviors and patterns, fare payment, and demographics. When possible questions will ask about other languages spoken at home. For some projects additional languages that meet the “safe harbor” threshold identified by the Four Factor Analysis will be accounted for to assess the ability to speak and/or read English.

PRACTICE

TriMet will determine when changes in demographics, types of services, or other needs, warrant changes to the Language Access Plan (LAP) or communication strategies.

RESPONSIBILITY

Research & Analysis, On-Board Survey Team

APPROACH

This practice will be carried out as part of the TriMet survey research program.

PROCEDURE

On-board surveys will be in tablet format in English and Spanish with safe harbor languages asked about English comprehension.

1. Add language question to research surveys conducted in a language other than English. Using wording from the U.S. Census Bureau, determine LEP status of those responding to TriMet surveys. Consistent with standard LEP survey practices, anyone answering either question *not well* or *not at all* is considered LEP.
 - Q1. How well do you speak English? Very well, well, not well, not at all
 - Q2. How well do you read English? Very well, well, not well, not at all
2. Add language preference question to research surveys conducted in English.
 - a. Is there a language other than English that you would prefer to take this survey in?

Telephone/mail/panel/surveys will be conducted in English and Spanish. In some surveys respondents will be asked about other languages spoken at home, if English is not their first language. They may also be asked how well they speak/read English.

Focus groups/intercept surveys/1-on-1 interviews/on-line surveys will be conducted in whatever languages are required to meet project plan purposes.

Results of research will be published on TriNet and on TriMet research page.

3C: Language Access Plan Monitoring and Compliance

Proposed: 11/16/2018

Updated: 2019

PURPOSE

Develop a process to monitor the effectiveness of TriMet's Language Access Plan (LAP) on an ongoing basis. Ensure compliance with Title VI of the Civil Rights Act of 1964, FTA Circular 4702.1B, and Executive Order 13166.

PRACTICE

TriMet will determine when changes in demographics, types of services, or other needs, warrant changes to the LAP. Updates to the LAP are reserved for FTA guidance memorandums or policy.

RESPONSIBILITY

Transit Equity, Inclusion, and Community Affairs; Research & Analysis; GIS & Location Based Services; Outreach Services, Multicultural Programs.

APPROACH

This approach will use a combination of qualitative and quantitative approaches to determine if the LAP is meeting the needs of the Limited English Proficiency (LEP) community. The use of federal and state regulations and policy will determine compliance. Results of the reviews will be posted on TriNet.org.

PROCEDURE

Regular LAP reviews will be conducted to make sure the LAP continues to include reasonable steps to ensure meaningful access to TriMet's programs and services for LEP communities. Monitoring the LAP program will take two forms:

1. **Ongoing Review:** This is an ongoing process conducted internally and externally throughout the year. Feedback solicited and received from: TriMet staff (front line and management/administration), LEP customers, and Community-Based Organizations (CBOs) serving the LEP populations. In this way, any **critical issues can be immediately addressed** and changes made to the Language Access Plan as needed.
 - a. Internal: Transit Equity, Inclusion, and Community Affairs staff will meet with TriMet colleagues quarterly to evaluate the quantity and quality of LEP activities encountered between TriMet staff and LEP customers. Staff will be asked to evaluate the effectiveness of LAP communication methods, materials, and messaging. Secret shoppers may be utilized to test our effectiveness at providing language assistance for different programs and services. Suggestions for improvements will be requested and acted upon as appropriate.

- i. **Front Line Surveys:** This will be a quantitative survey conducted among front-line staff to track any changes in quantity and quality of LEP customer encounters. Survey questions will include: awareness and use of TriMet's language assistance services; frequency of LEP customer encounters, how they communicate with LEP passengers; what the agency could do to help them.
 - b. **External:** Meet with LEP customers and CBO representatives to find out how well elements of the LAP communications are working. This part of the review will rely on the CBOs and Faith Based Organizations serving LEP populations.
 2. **Triennial Review:** The Language Access Plan will be reviewed on annual basis. Included in the review would be the results of any changes in demographics, types of services, or other needs. The annual review includes:
 - a. A Four Factor Analysis: to gather internal and external program data, analyze results, and report on the status of the program in light of updated information.
 - b. Community Consultations: Conducted with members of the LEP communities to determine how well the agency is working for them and to track any changes due to implementation of the LAP actions. The consultations will focus on:
 - i. Awareness of and use of TriMet's language assistance services
 - ii. Experiences with TriMet's fares/tickets, routes/schedules, and safety/security issues
 - iii. Understanding and evaluation of customer information materials – visual, auditory, and written
 - iv. Suggestions to make riding TriMet easier

The frequency of re-evaluation of the LAP will be based on agency staff review of whether "demographics, services, and needs" remain constant.

4A: Curriculum Development

Proposed: 3/10/09

Adopted: 12/1/10

Updated: 2019

PURPOSE

The purpose of the training program is to ensure that TriMet employees know their obligations to provide *meaningful access* to information and services for LEP (Limited English Proficiency) persons.

RESPONSIBILITY

Operations Training – Bus Training Supervisors, Rail Training Supervisor; Manager, Fare Enforcement Administration, Maintenance Training Supervisors, Field Operations Training Supervisors; Dir, Safety Management Sys & Environmental Svcs.; Manager, Security and Emergency Management; Executive Director of Public Affairs; Multicultural Programs Manager; Program Manager, Learning and Development; Recruitment Supervisor; Chief Station Agent.

APPROACH

The approach taken with the training element of the Language Access Plan (LAP) may employ a combination of written materials, PowerPoint slide presentation, eLearning, and in-person question and answer sessions. Trainings are designed to give presenters the flexibility necessary to meet the informational needs unique to each workgroup. While the means of delivering information may vary from audience to audience, the core messages remain consistent throughout. Workgroups identified for training fall into these general categories:

1. Front line employees: Operators, Trainers, Customer Service Representatives, Public Affairs Representatives, Lost and Found, Maintenance
2. Finance & Administration Services
3. Management (all levels)
4. Support staff (Administrative staff)
5. Field Operations
6. Ride Guide & Ask Me Staff
7. Security and Fare Enforcement

The Training Subcommittee has developed LAP training curriculum, and works to maintain a LAP training curriculum, with guidance from the LAP Program Team. The LAP training for front line employees and other TriMet staff focuses on the many elements of the LAP program including:

- Summary of the agency's responsibilities under the DOT LEP Guidance

- LEP populations in the TriMet service district
- Summary of TriMet's LAP
- Summary of the Four Factor Analysis
- Description of the language services available to LEP customers and staff
- How staff and LEP customers can access these services
- How to work effectively with interpreters in-person and over the telephone
- How to communicate with LEP persons face-to-face, over the telephone, and in writing
- How to respond to civil rights complaints

4B: Incorporate LAP Information in Employee Environment

Proposed: 3/10/09

Adopted: 12/1/10

Updated: 2019

PURPOSE

Establish a procedure to incorporate Language Access Plan (LAP) information into the employee environment.

RESPONSIBILITY

Operations Training, Director/Marketing, Multicultural Programs Manager, Director/Talent Management.

APPROACH

The approach taken with this element of the training program is to identify the various means of delivering information to TriMet employees. The most effective communication channels identified are varied in form: in-person training, employee meetings, written materials, and electronic delivery systems.

- Training sessions:
 - New Employee Orientation
 - Operator Training Program and Recertification
 - Field Operations Training Program
 - Management and professional development training and events such as “Lunch and Learns” and the “E3 Program”
- Meetings:
 - Division meetings
 - Administrative staff departmental meetings
 - Expanded Directors’ Exchange
 - Executive Team meetings
 - Quarterly Town Hall meetings
 - Employee Resource Group
- Written materials:
 - TriMet Employee Handbook
 - Employee posters or fliers for bulletin boards
 - Operator notices
- Electronic media:
 - TriMet’s internal website – **TriNET**
 - Employee weekly e-newsletter – **Expressline**
 - TV monitors in breakrooms
 - All employee emails

PROCEDURE

The procedure to incorporate the LAP information into new employee orientation, employee handbook, and TriNET will conform to existing procedures used to provide employee required information.

Exhibit 2: Four Factor Analysis



Four Factor Analysis

2019 Update

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Appendix B: Bus Operator Intercept Survey Report

Appendix C: Bus Operator and Field Operations Survey Findings

Appendix D: Bus Operator Survey Instrument

Appendix E: Road and Rail Supervisor Survey Instrument

Introduction

TriMet strives to provide meaningful access to programs and services for all community members, including those with limited English proficiency (LEP). Beyond compliance with relevant guidelines and regulations, this supports TriMet’s vision, mission, and values:

Vision

TriMet will be the leader in delivering safe, convenient, sustainable and integrated mobility options necessary for our region to be recognized as one of the world’s most livable places.

Mission

Connect people with valued mobility options that are safe, convenient, reliable, accessible and welcoming for all.

Values

Safety · Inclusivity · Equity · Community · Teamwork

TriMet last performed a Four Factor Analysis examining the language needs and services provided to LEP individuals in 2016. The Portland metropolitan region has seen dramatic population growth and demographic changes since that time, calling for an updated assessment.

Title VI Regulatory Background

1. Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), interpreted Title VI regulations promulgated by the former Department of Health, Education, and Welfare to hold that Title VI prohibits conduct that has a disproportionate effect on persons with limited English proficiency (LEP) because such conduct constitutes national origin discrimination.
2. Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” Reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services. Federal agencies were instructed to publish guidance for their respective recipients in order to assist them with their obligations to LEP persons under Title VI. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

Department of Transportation LEP Guidance

The U.S. Department of Transportation (DOT) LEP guidance states that Title VI and its implementing regulations require that DOT recipients take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. The Federal Transit Administration published its LEP Guidance in its Circular 4702.1B “Title VI Requirements and Guidelines for Federal Transit Administration Recipients” requiring recipients to develop an LEP implementation plan consistent with the provisions of Section VII of the DOT LEP guidance.

Four Factor Analysis

As per DOT and FTA guidance, there are four factors for agencies to consider when assessing language needs and determining what steps they should take to ensure access for LEP persons:

- 1) The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity or service of the recipient;
- 2) The frequency with which LEP individuals come in contact with the program;
- 3) The nature and importance of the program, activity or service provided by the recipient to people’s lives; and
- 4) The resources available to the recipient for LEP assistance activities and the associated costs.

A description of the self-assessment undertaken in each of these areas follows.

Evaluation Methods and Data Sources

In accordance with FTA’s policy guidance, the initial step for providing meaningful access to services for LEP persons and maintaining an effective LEP program is to identify LEP populations in the service area and their language characteristics through an analysis of available data. Determining the presence of LEP populations in the TriMet service district area was done through an analysis of the following data sources:

- US Census Bureau, 2012-2016 5-year sample, American Community Service data
- Oregon Metro Regional Land Information System (RLIS)
- Oregon Department of Education Student Language of Origin data , 2017-2018
- Oregon Health Authority Public Health Women-Infant-Children program data, 2016-2018
- Oregon Judicial Department court language service request data, 2016-2019
- TriMet Geographic Information System
- Spring 2018 on-board rider survey
- Fall 2018 system-wide fare survey
- Summer 2018 operator survey regarding contact with LEP persons
- Fall 2018 road and rail supervisors survey regarding contact with LEP persons
- Call center language interpretation requests and views of translated webpage www.trimet.org
- 2019 TriMet language services survey

In addition to analyzing data, TriMet staff have become familiar with LEP populations in the TriMet service district by working with community organizations that serve these populations. TriMet regularly works with these organizations when conducting outreach concerning service changes or other matters, such as how to enroll in the Reduced Fare Program. TriMet turns to these organizations for assistance in identifying language translation needs and in planning the best ways to inform and involve people with limited English proficiency. Key organizations include the following:

APANO	African Family Holistic Health Organization
Asian Health and Services Center	Bienestar
Catholic Charities	Centro Cultural
Immigrant & Refugee Community Organization	IRCO Africa House
IRCO Asian Family Center	Hacienda CDC/Baltazar Community Center
Latino Network	Portland ESL Network

Factor 1: The number and proportion of LEP persons served or likely to be encountered by a TriMet program, activity or service

2012 - 2016 American Community Survey 5-Year Sample

The US Census Bureau collects data about the ability to speak English as well as the language spoken at home via the American Community Survey (ACS) and allows for the identification of LEP languages falling within the “Safe Harbor” thresholds. The thresholds are 5% of total population or 1,000 individuals, whichever is less. This data was retrieved for the TriMet district, which includes most of Clackamas, Multnomah, and Washington Counties.

For the initial piece of the Factor 1 Analysis, TriMet analyzed 2012-2016 5-year Census ACS data to identify LEP populations within the TriMet service district as well as those populations’ access to TriMet bus and rail service. The LEP population is defined as those who reported to the Census Bureau that they speak English “less than very well.”

DOT “safe harbor” guidance calls for written translations of vital documents for each language group that constitutes at least 5% or 1,000 LEP individuals, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered (i.e. the TriMet service area). Translations of other documents, if needed, can be provided orally. For TriMet’s purposes this means that the “safe harbor” threshold is 1,000 persons because this is much less than 5% of the population.

Failure to provide written translations under the safe harbor criteria does not mean there is non-compliance with LEP access requirements, but adherence to the safe harbor criteria will serve as strong evidence of compliance.

Population Figures. As shown in Table 1 on the next page, LEP populations represent 8.3% of the total population aged five years and older within the TriMet district, or about 123,000 persons. The largest proportion consists of Spanish speaking LEP individuals (3.8% of the total population and 46% of the LEP population), followed by Vietnamese (0.9% of the total population and 11% of the LEP population). Eleven other languages meet the Safe Harbor threshold of 1,000 LEP individuals according to the ACS.

Table 1: Languages spoken by LEP persons age 5 and older in TriMet district

Languages Spoken at Home	LEP Population Estimate	% of Total Population	% of LEP Population
Spanish	56,605	3.8%	46.1%
Vietnamese	13,598	0.9%	11.1%
Chinese (Cantonese, Mandarin)	9,892	0.7%	8.1%
Russian	6,656	0.5%	5.4%
Korean	3,259	0.2%	2.7%
Ukrainian	2,948	0.2%	2.4%
Arabic	2,336	0.2%	1.9%
Tagalog	2,095	0.1%	1.7%
Japanese	1,867	0.1%	1.5%
Mon-Khmer, Cambodian	1,658	0.1%	1.3%
Persian/Farsi	1,159	0.1%	0.9%
Other (e.g., Romanian and Somali)	20,799	0.1%	16.9%
Total	122,872	8.3%	

Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Tables: 2012 - 2016 (5-Year Estimates).

LEP Maps. The ACS data was also plotted on a series of maps and overlaid with TriMet’s bus and rail service, provided on the following twelve pages:

- Figure 1: LEP populations greater than the region average of 8.3%.
- Figure 2: Distribution of concentrations of Spanish-speaking LEP populations
- Figure 3: Distribution of concentrations of Vietnamese-speaking LEP populations
- Figure 4: Distribution of concentrations of Chinese-speaking LEP populations
- Figure 5: Distribution of concentrations of Russian-speaking LEP populations
- Figure 6: Distribution of concentrations of Korean-speaking LEP populations
- Figure 7: Distribution of concentrations of Ukrainian-speaking LEP populations
- Figure 8: Distribution of concentrations of Arabic-speaking LEP populations
- Figure 9: Distribution of concentrations of Tagalog-speaking LEP populations
- Figure 10: Distribution of concentrations of Japanese-speaking LEP populations
- Figure 11: Distribution of concentrations of Mon-Khmer-speaking LEP populations
- Figure 12: Distribution of concentrations of Persian-speaking LEP populations
- Figure 13: Distribution of concentrations of Indo-European-speaking LEP populations

Limited English Proficient Population Distribution

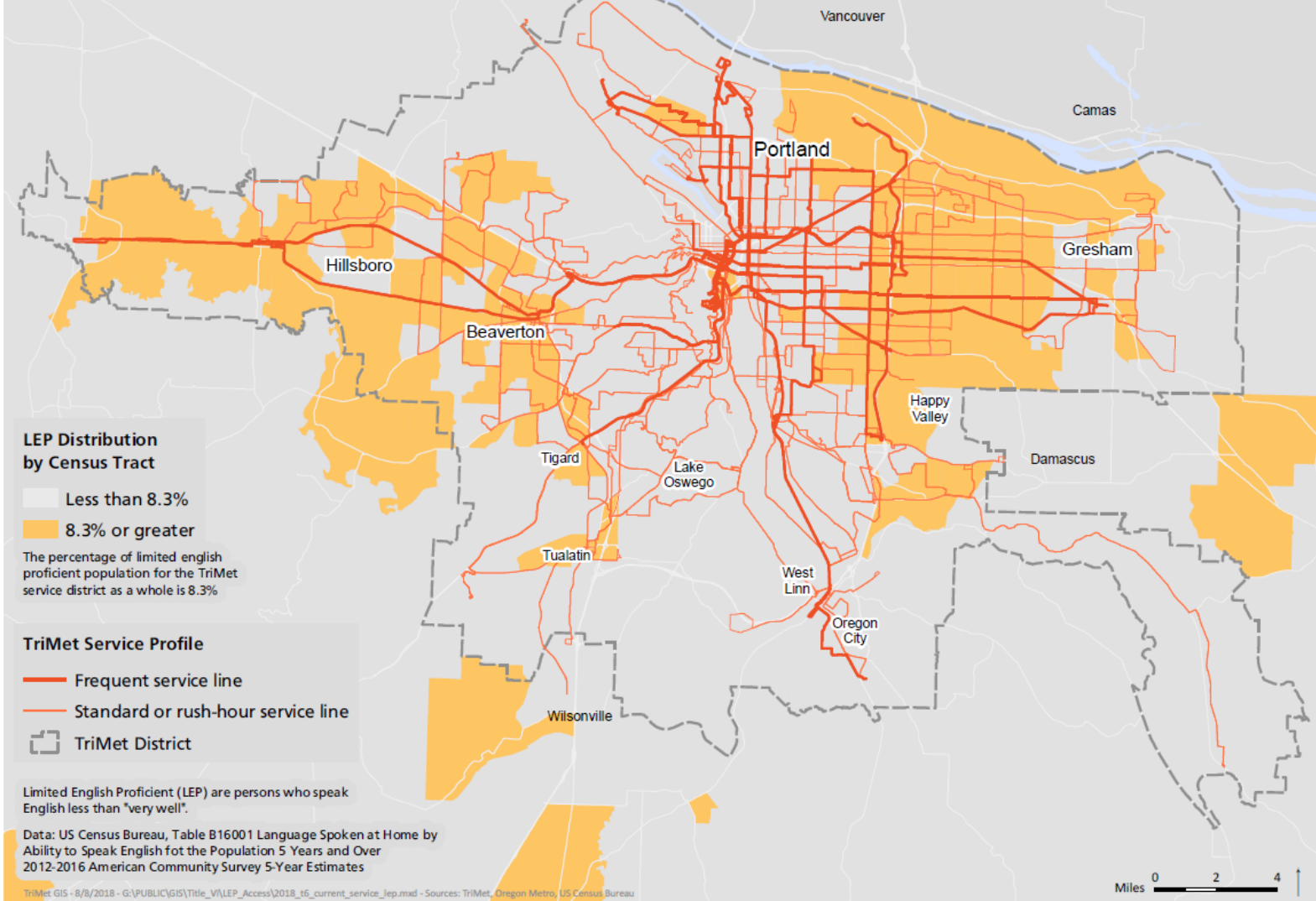


FIGURE 1: LEP POPULATION AND TRIMET DISTRICT

Limited English Proficient Spanish-speaking population distribution

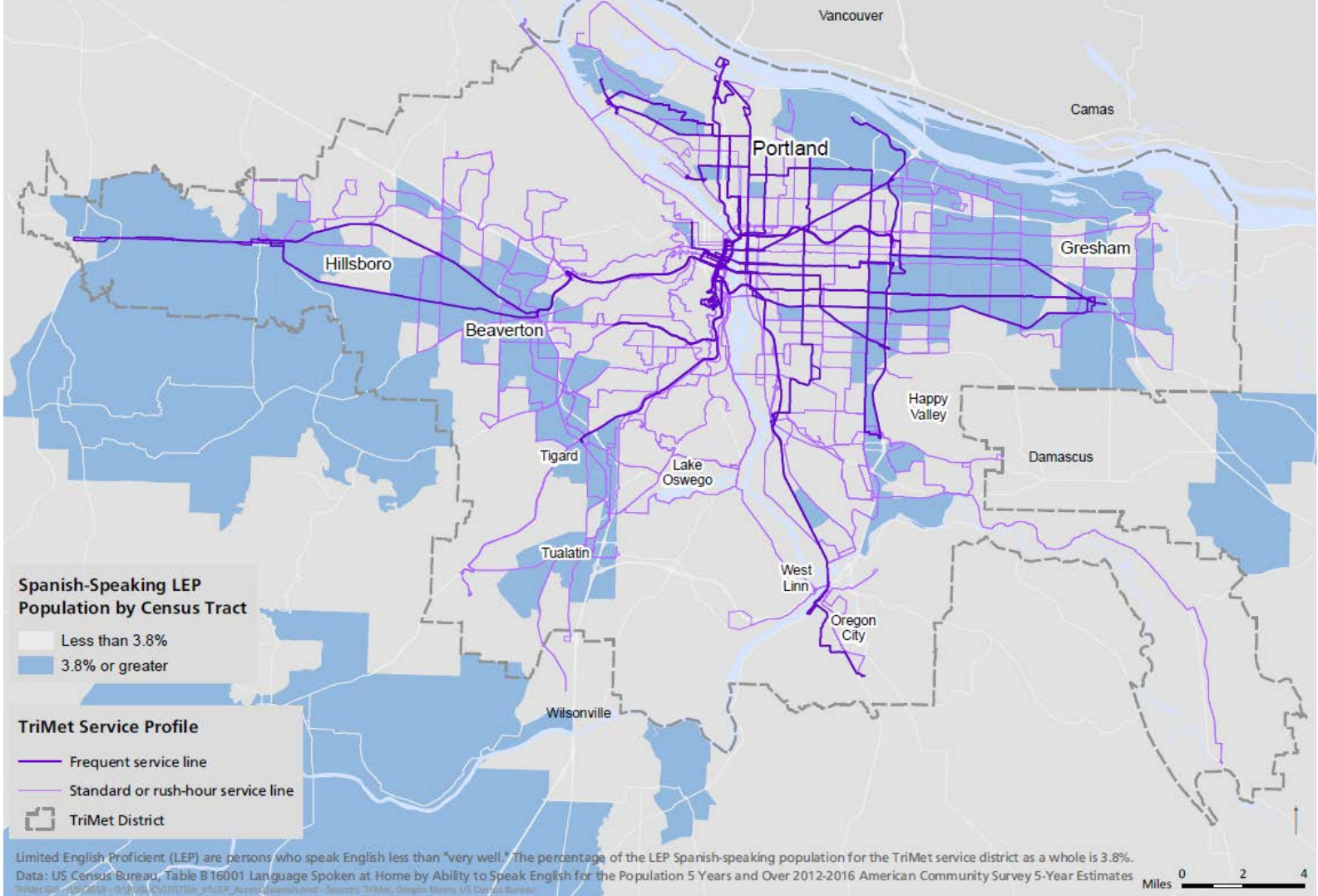


FIGURE 2: SPANISH-SPEAKING LEP POPULATION AND TRIMET DISTRICT

Limited English Proficient Vietnamese-speaking population distribution

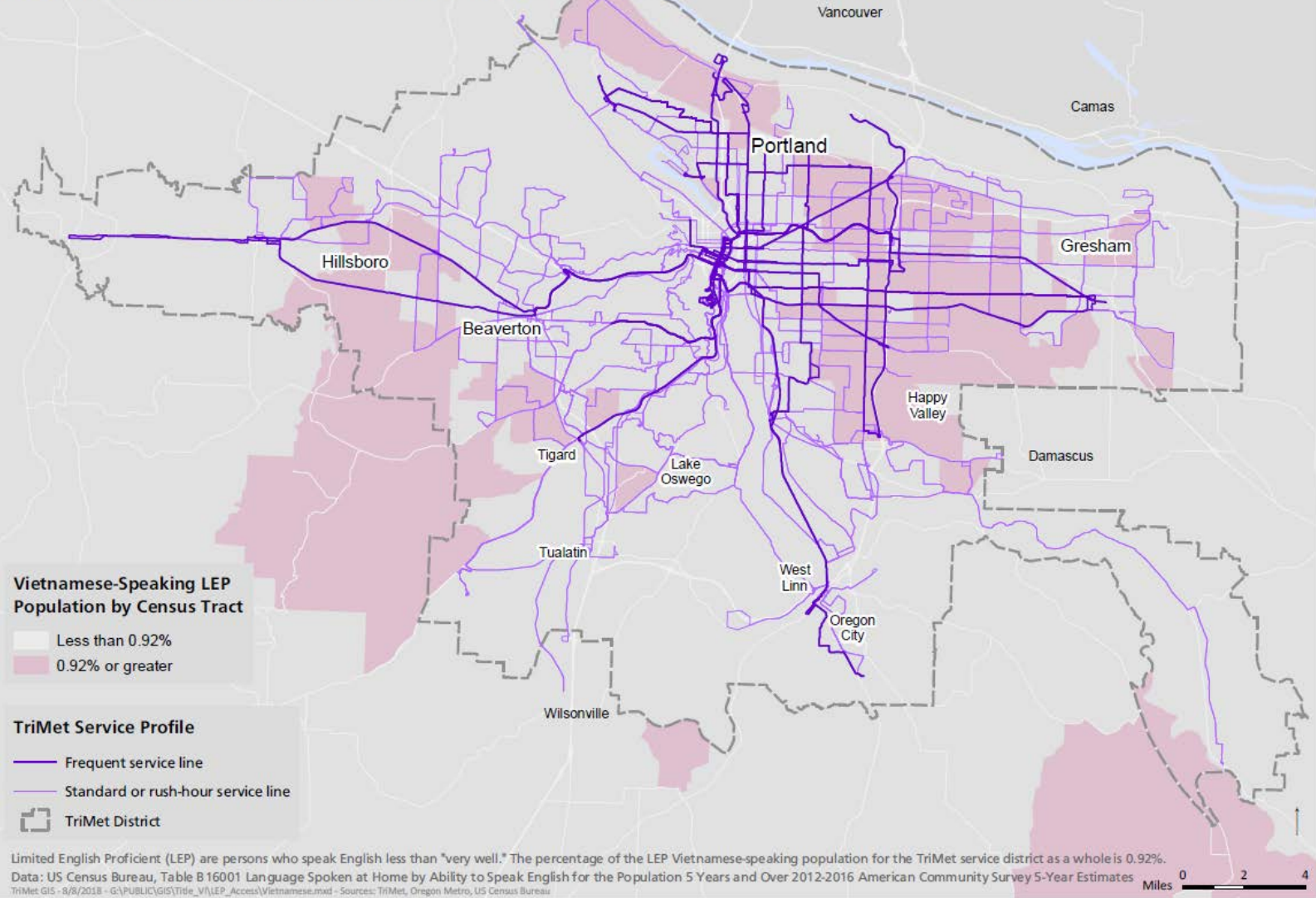


FIGURE 3: VIETNAMESE-SPEAKING LEP POPULATION AND TRIMET DISTRICT

Limited English Proficient Chinese-speaking population distribution

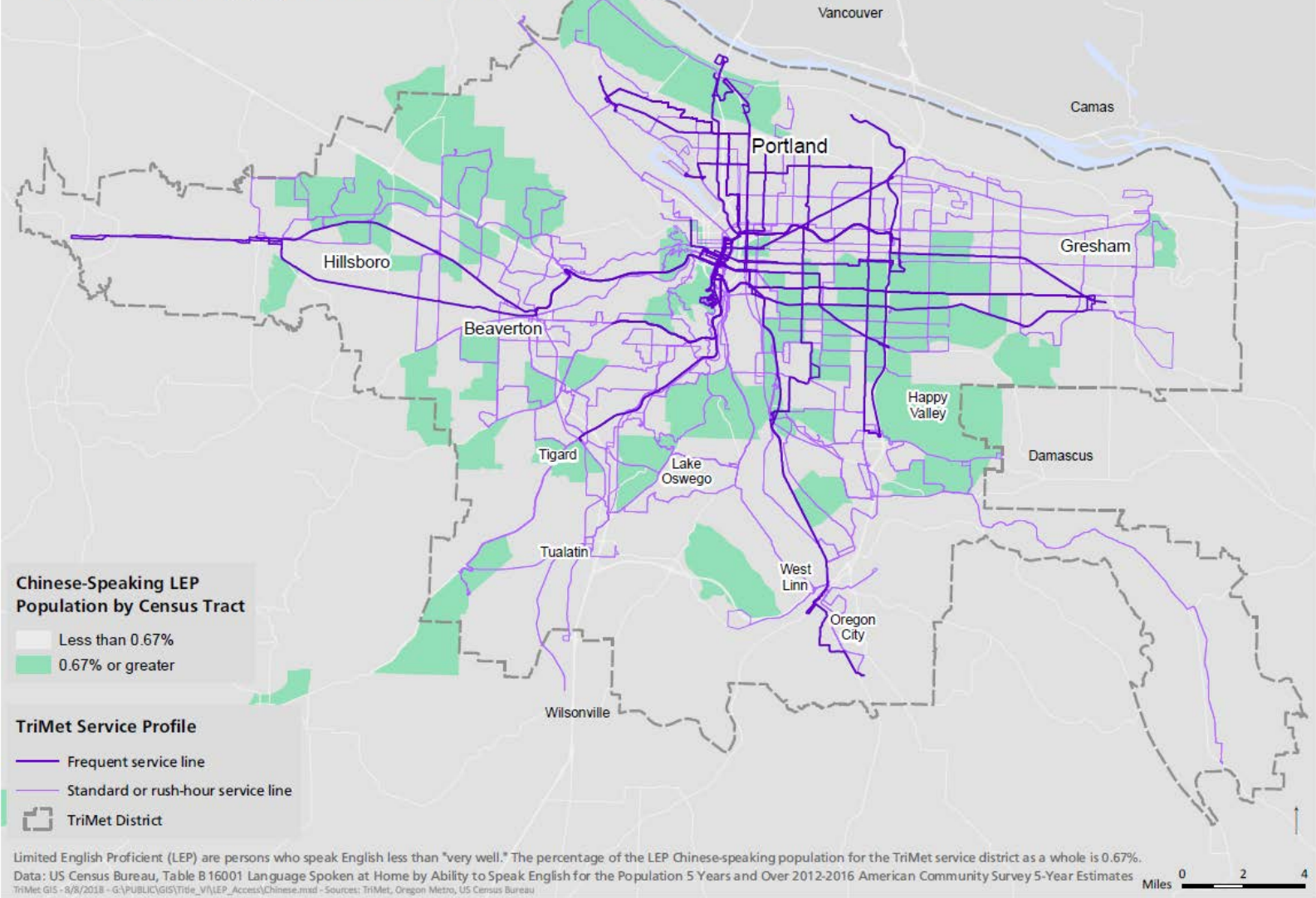


FIGURE 4: CHINESE-SPEAKING LEP POPULATION AND TRIMET DISTRICT

Limited English Proficient Russian-speaking population distribution

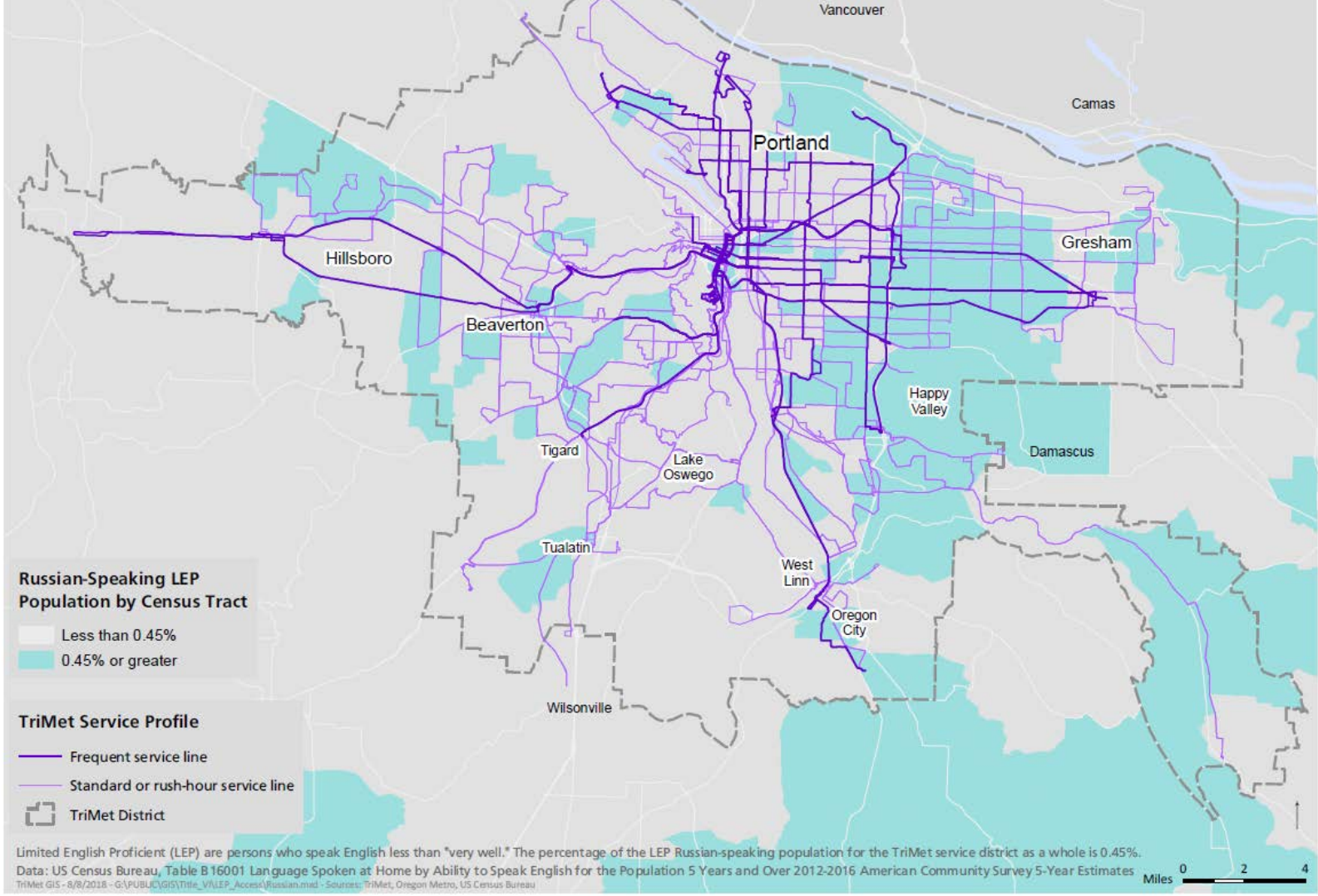


FIGURE 5: RUSSIAN-SPEAKING LEP POPULATION AND TRIMET DISTRICT

Limited English Proficient

Korean-speaking population distribution

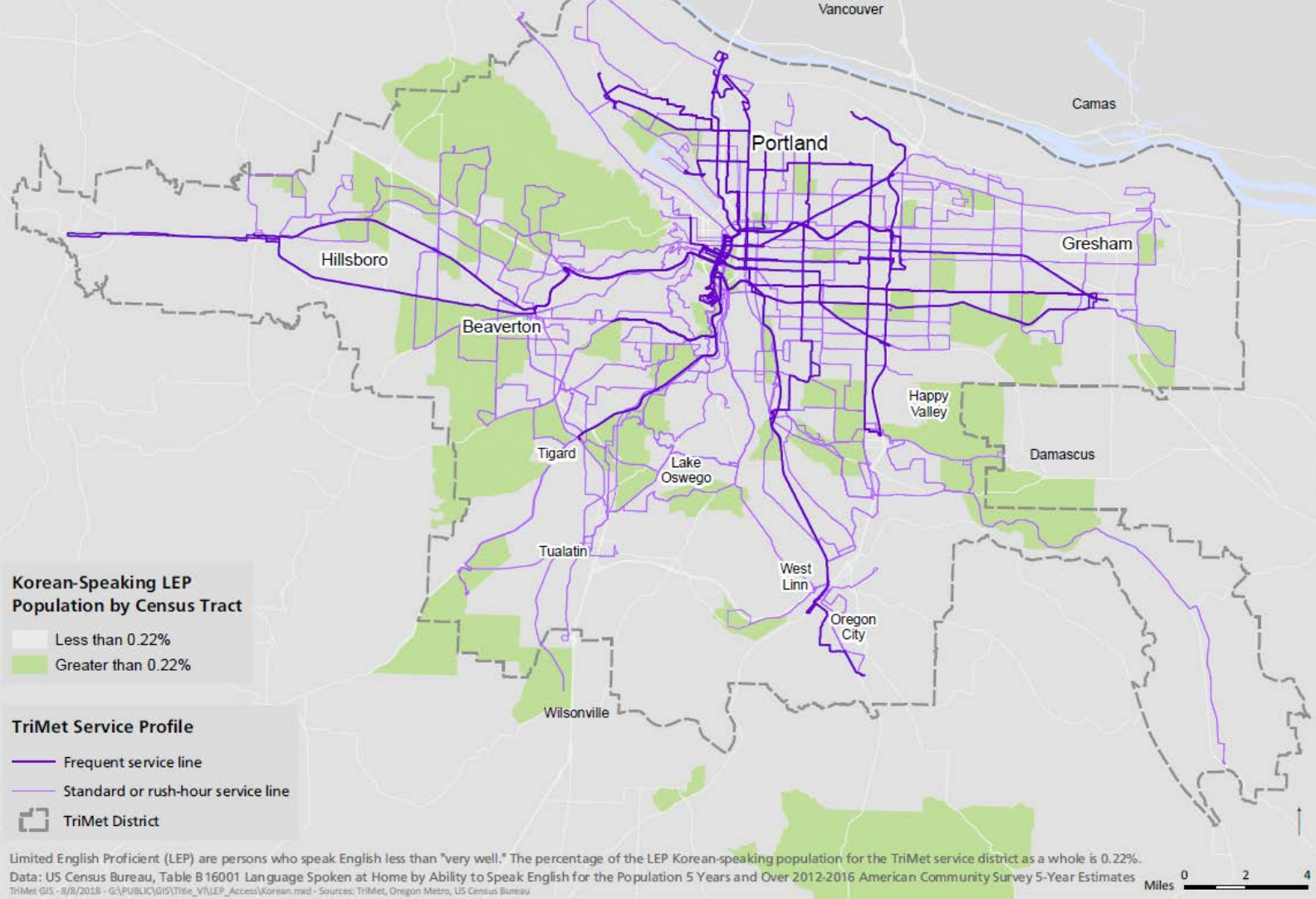


FIGURE 6: KOREAN-SPEAKING LEP POPULATION AND TRIMET DISTRICT

Limited English Proficient

Ukrainian-speaking population distribution

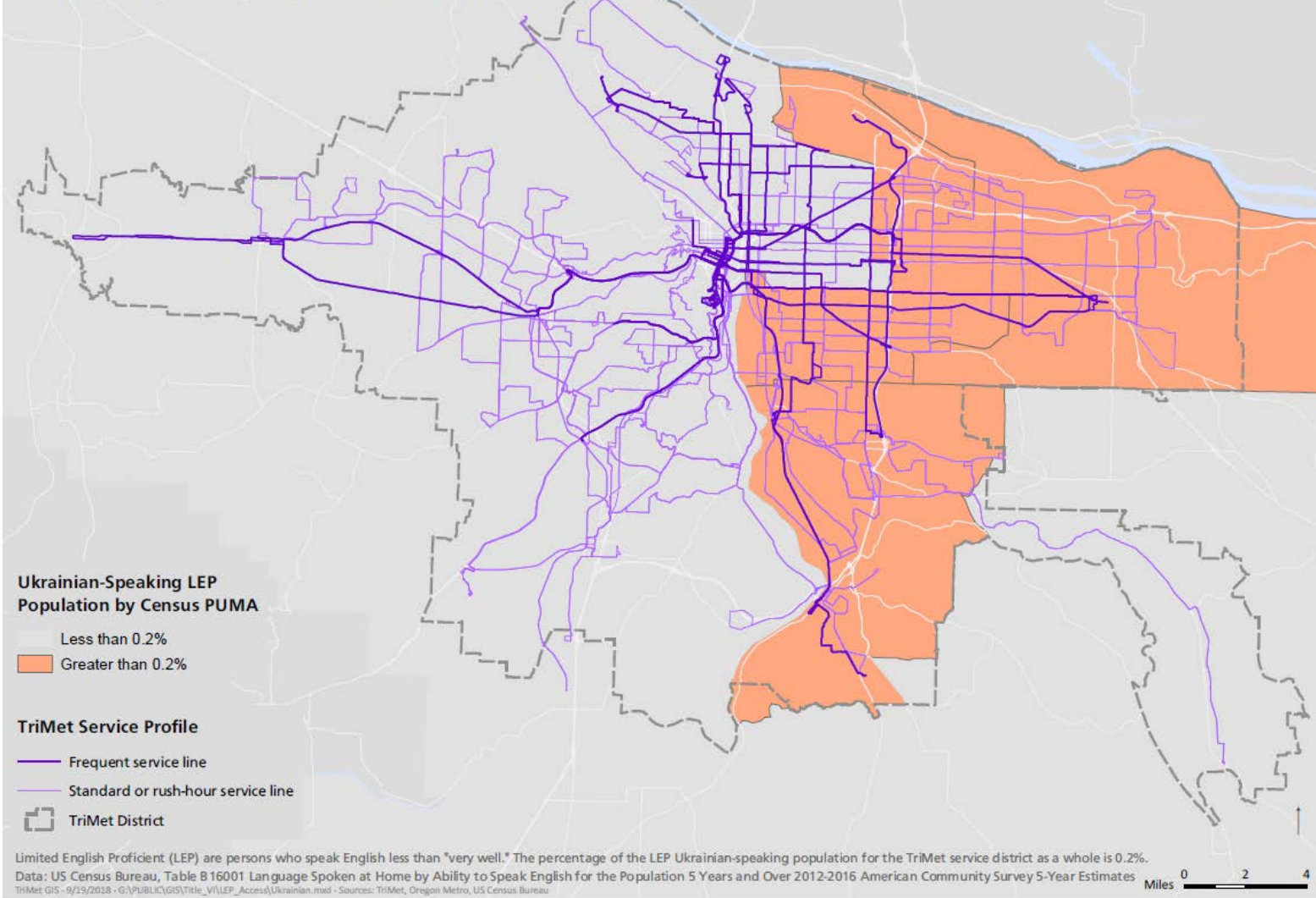


FIGURE 7: UKRAINIAN-SPEAKING LEP POPULATION AND TRIMET DISTRICT

Limited English Proficient

Arabic-speaking population distribution

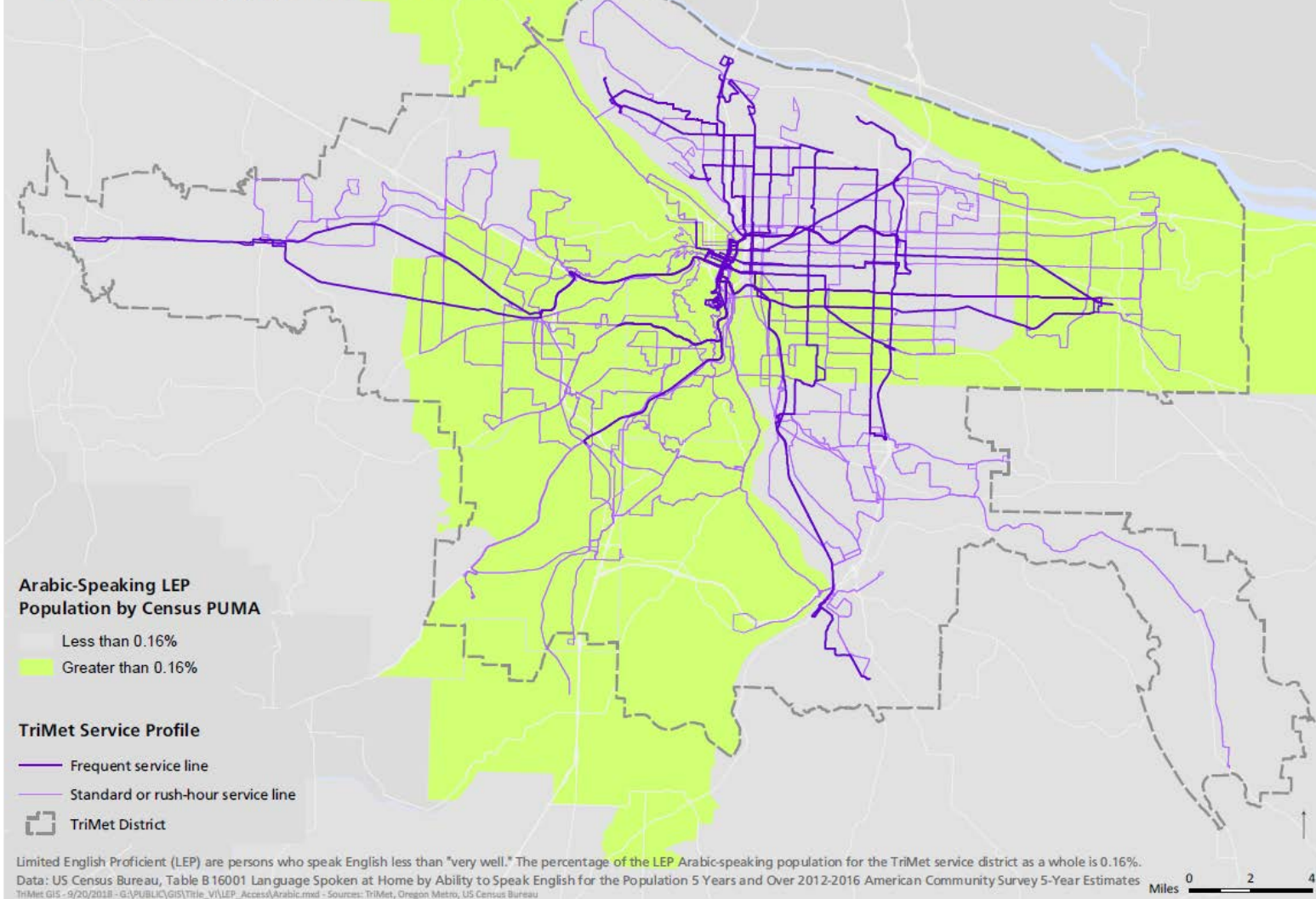


FIGURE 8: ARABIC-SPEAKING LEP POPULATION AND TRIMET DISTRICT

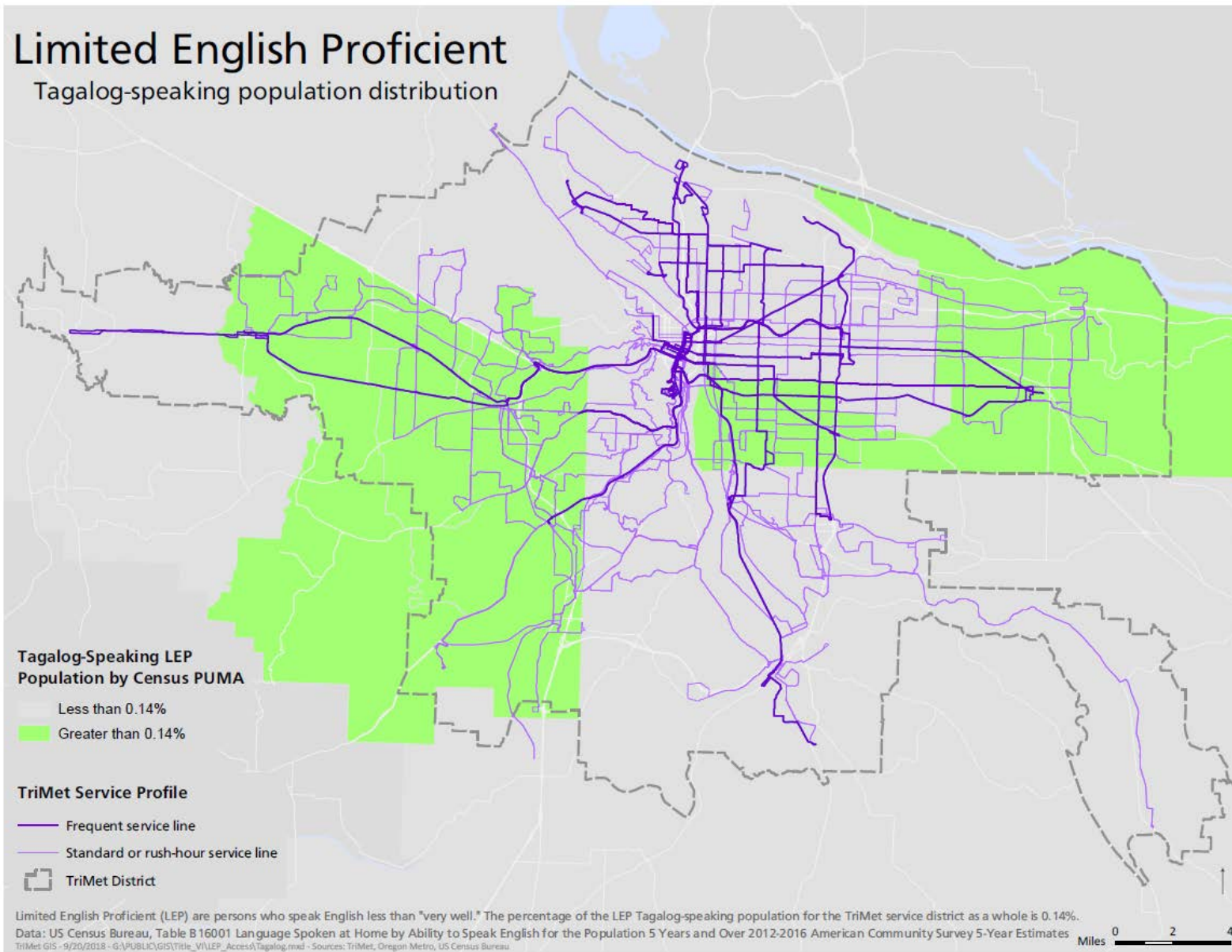


FIGURE 9: TAGALOG-SPEAKING LEP POPULATION AND TRIMET DISTRICT

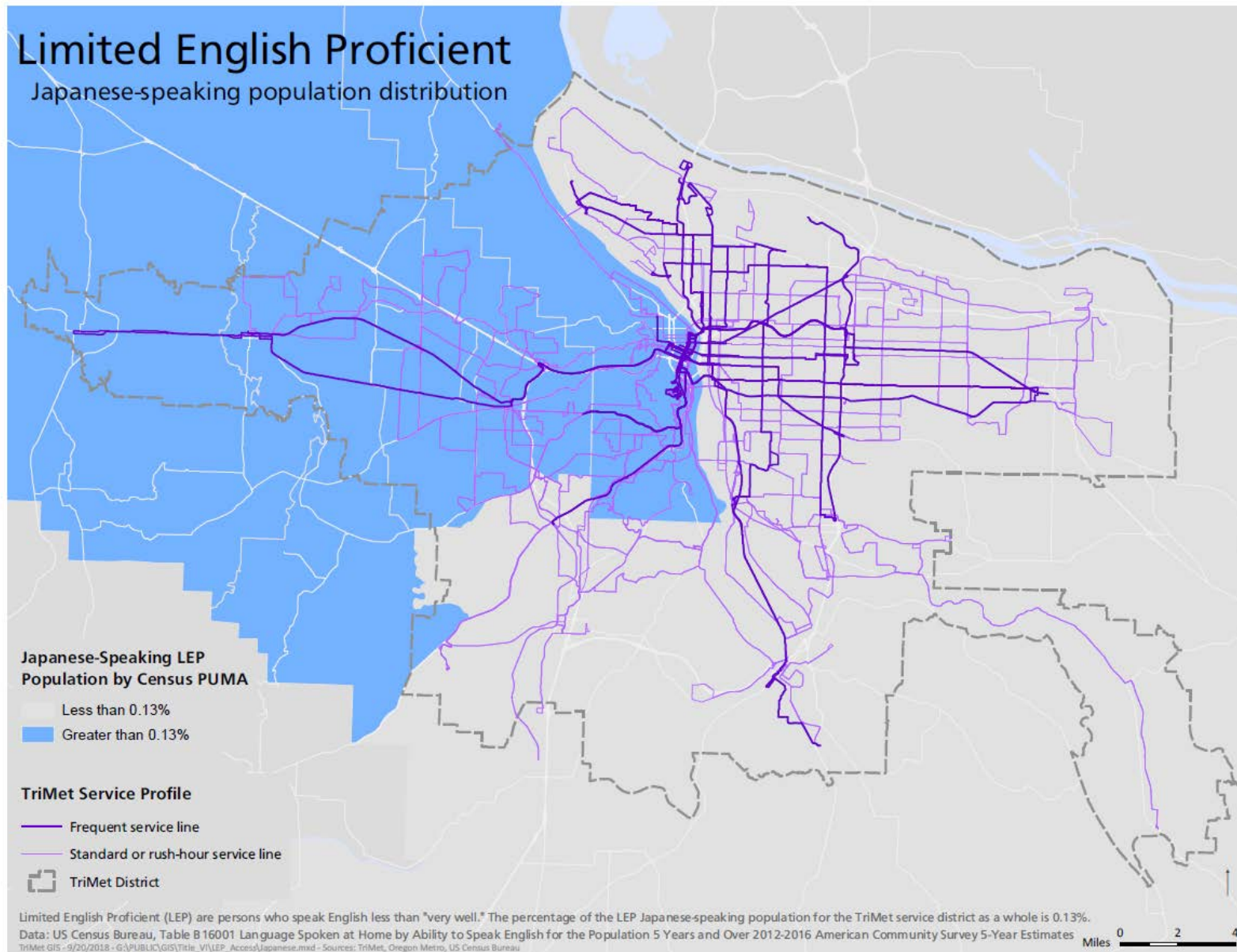


FIGURE 10: JAPANESE-SPEAKING LEP POPULATION AND TRIMET DISTRICT

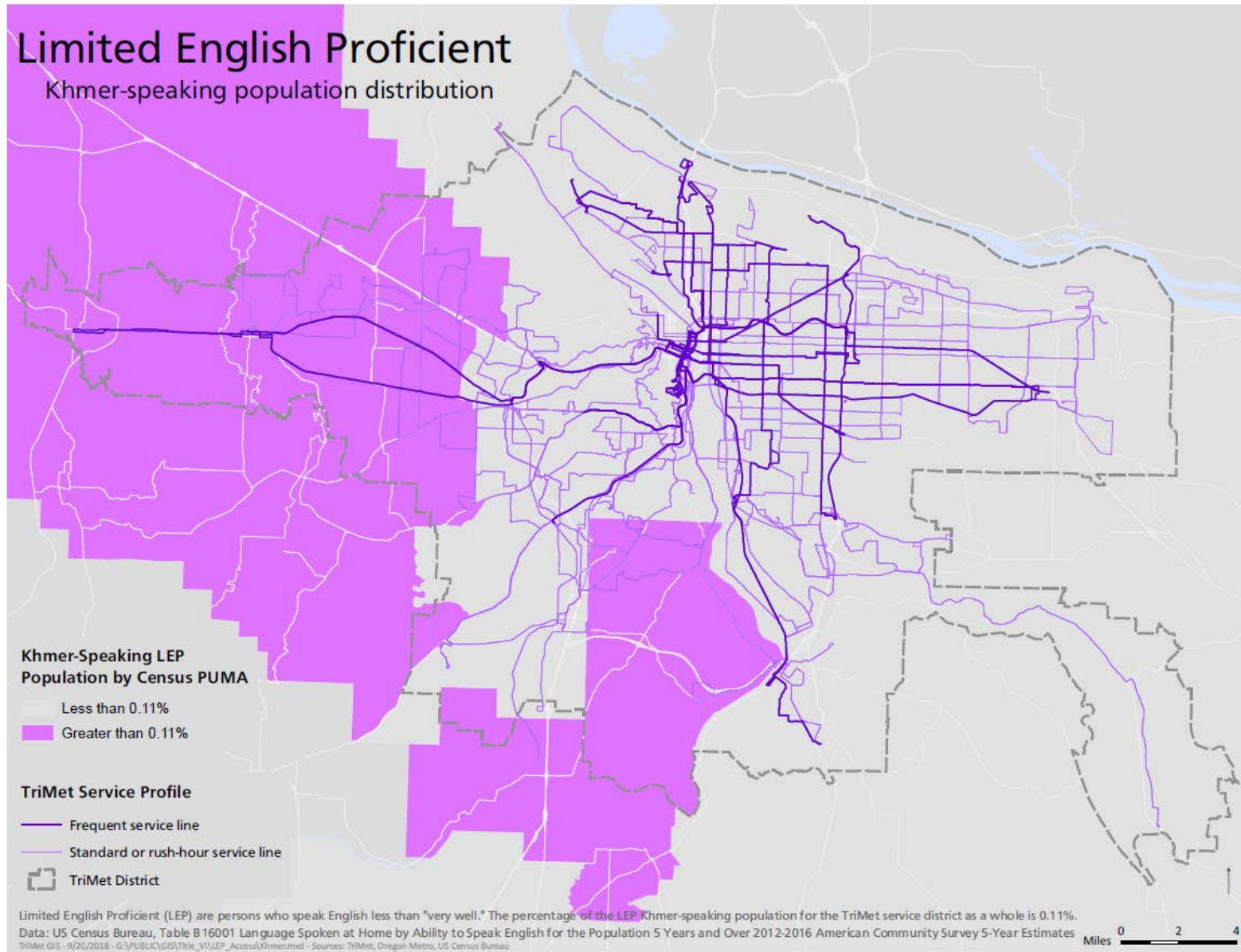


FIGURE 11: MON-KHMER-SPEAKING LEP POPULATION AND TRIMET DISTRICT

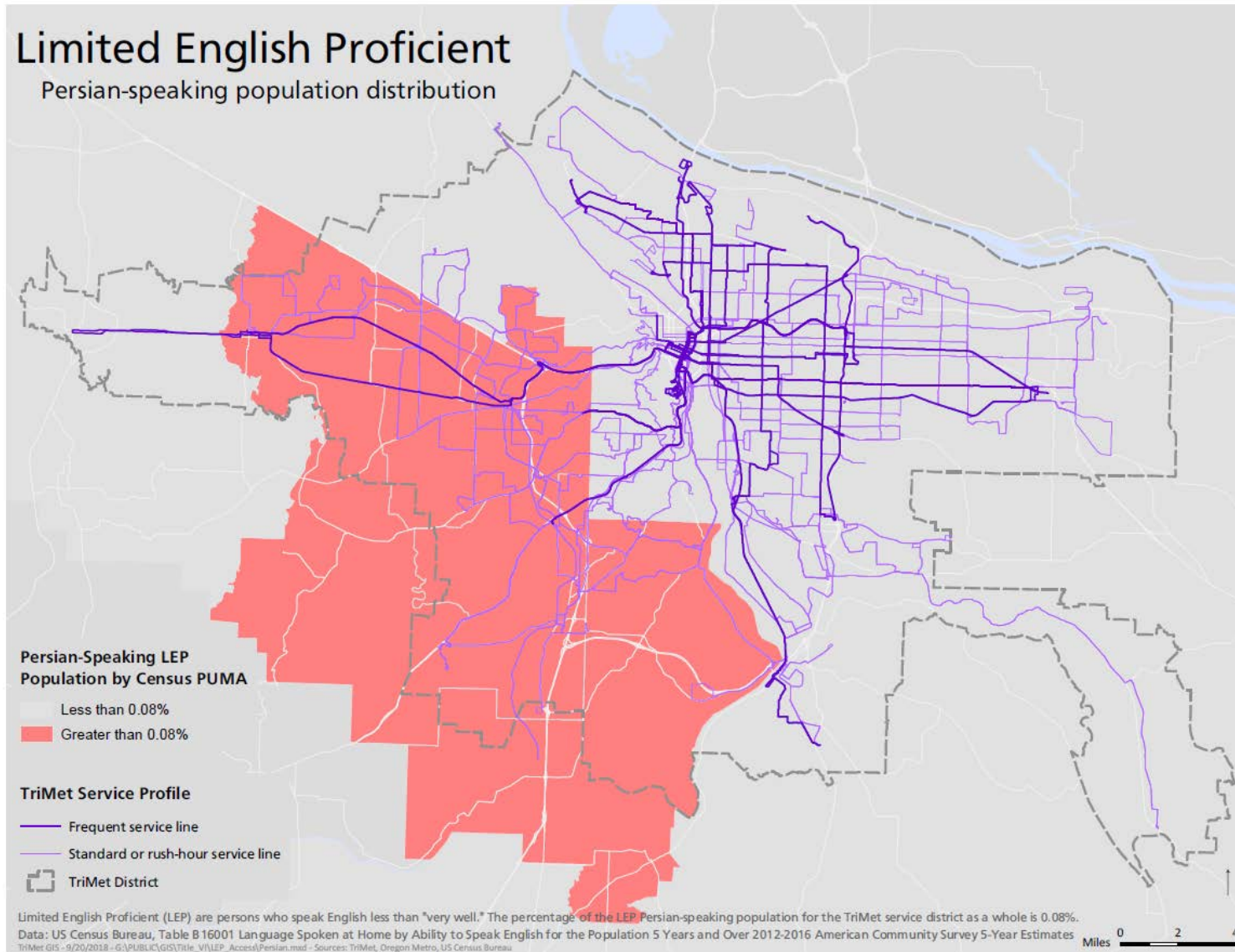


FIGURE 12: PERSIAN-SPEAKING LEP POPULATION AND TRIMET DISTRICT

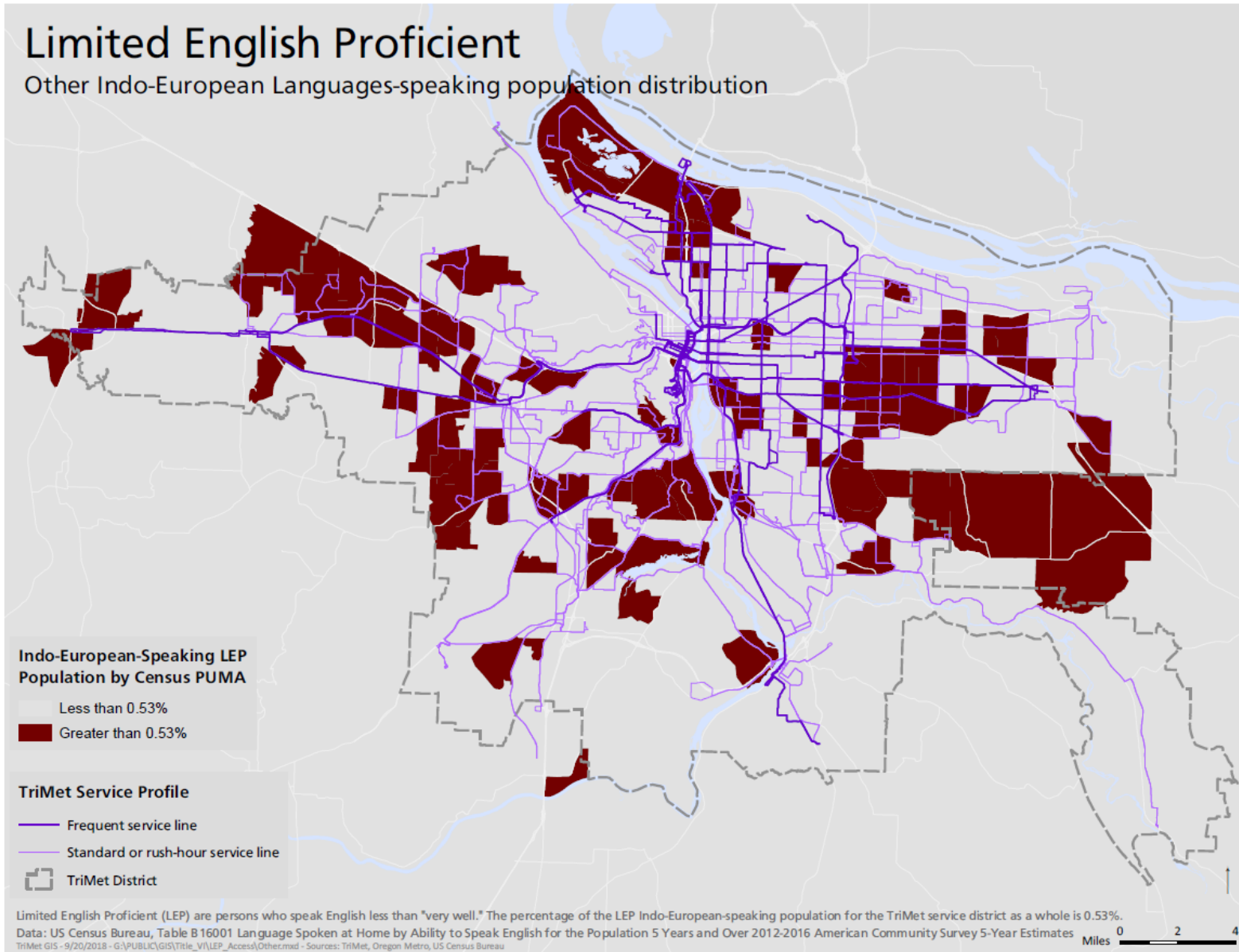


FIGURE 13: INDO-EUROPEAN-SPEAKING LEP POPULATION AND TRIMET DISTRICT

Oregon Department of Education

In addition to considering the American Community Survey estimates, Factor 1 considered the most recent data on the Student Language of Origin from the Oregon Department of Education (ODE) for the 2017-2018 school years. The data includes statistics on the language spoken at home and enrollment in English as a Second Language (ESL) services by students ranging from kindergarten to high school. It is assumed that if children are identified as speaking a language other than English, then their parents or adult guardians are likely to speak the same language at home, especially for students receiving ESL services. While this data set does not identify the number of people above the school age that speak a language other than English, it can be a helpful complement to Census data.

Data was compiled from the following school districts serving students within the TriMet district boundaries: Beaverton, Centennial, David Douglas, Estacada, Forest Grove, Gladstone, Gresham-Barlow, Hillsboro, Lake Oswego, North Clackamas, Oregon City, Parkrose, Portland, Reynolds, Riverdale, Sherwood, Tigard, Tualatin, and West Linn-Wilsonville.

In total, 65,041 students have a language of origin besides English, 26,642 (41%) of whom received ESL services in 2017-2018. The top languages in terms of number of students are shown in Table 2.

**Table 2. Student Languages of Origin for School Districts within TriMet service district
2017 - 2018**

Language	Number of Students	Pct Receiving ESL Services
Spanish	37,174	45%
Vietnamese	4,095	25%
Russian	3,499	37%
Chinese	2,842	27%
Arabic	1,676	51%
Somali	1,309	59%
Ukrainian	952	36%
Korean	884	26%
Romanian	784	32%
Japanese	794	37%
Chuukese	646	61%
Tagalog	491	33%

The school districts with the highest concentration of ESL students were:

1. **Reynolds** (located in the northeast corner of the TriMet district): 29% of students receiving ESL services.
2. **David Douglas** (located in East Portland): 24% of students receiving ESL services.
3. **Centennial** (portions in East Portland, Gresham, Damascus, and Happy Valley): 21% of students receiving ESL services.
4. **Forest Grove** (located on western edge of TriMet district): 17% of students receiving ESL services).
5. **Hillsboro** (located in western Washington County): 17% of students receiving ESL services.

Oregon Health Authority

Data was compiled from participating Oregon Women, Infant, and Child (WIC) clinics from Washington, Clackamas and Multnomah counties. The date range was from January 1, 2016 to December 31, 2018. In total, there were 55 distinct languages spoken by clients frequenting the clinics. Utilizing the thirteen “safe harbor” languages in the TriMet service district, Table 3 shows a frequency count of unique clients by spoken language.

Table 3. Spoken Languages of WIC Clients within the Tri-County Area

Language	2016	2017	2018
Spanish	8815	7859	7086
Russian	827	840	817
Vietnamese	465	423	383
Chinese (Cantonese)	363	353	332
Chinese (Mandarin)	<30	<30	31
Arabic	209	249	263
Somali	234	213	200
Cambodian	<30	<30	<30
Persian-Farsi	<30	<30	<30
Japanese	<30	<30	<30
Tagalog	<30	<30	<30
Korean	<30	<30	<30
Romanian	<30	<30	<30
Ukrainian	<30	<30	<30

Oregon Judicial Department

Statewide court language service requests were also compiled from the Oregon Judicial Department. Of note, 60% of all Oregon LEP individuals reside in just five counties: Multnomah, Washington, Clackamas, Marion, and Lane (Oregon Department of Transportation 2012). The date range was from January 1, 2016 to January 1, 2019.

**Table 4. Court Languages Service Requests within the State of Oregon
2016 - 2019**

Language	Number of Persons	Language	Number of Persons	Language	Number of Persons
Spanish	27,699	Chinese	453	Tagalog	139
Russian	1,061	Somali	418	Korean	110
Chuukese	621	Mam	189	Romanian	97
Vietnamese	563	Persian-Farsi	151	Laos	84
Arabic	550	Swahili	143	Ukrainian	75

Synthesis

Overall, LEP populations are concentrated primarily in western and eastern suburban locations as well as north Portland.

The ODE and ACS data largely align, with a few exceptions. For one, and as was the case in the 2012 Four Factor update, Somali is identified as one of the top non-English languages spoken in the TriMet district through the ODE data. The recent ODE data indicates that 1,309 Somali-speaking students received ESL services (59% of the total). With the addition of parents or adult guardians to this figure pushes Somali over the “safe harbor” provision of 1,000 speakers who are LEP. This may be a case of population undercount by the ACS.

The Romanian language group met the “safe harbor” provision with a total of 1,862 as of the 2011-2015 ACS. Due to recent Census language category changes, Romanian was added to the Indo-European language category. Additionally, with the number of student speakers (784) and their parents or adult guardians we can consider the threshold to have been met.

Arabic also stands out as potentially having a higher LEP population according to the ODE, WIC, and court data as compared to the ACS. Finally, there may be a larger LEP population of Chuukese speakers than the ACS would indicate, given that the number of student speakers is over 600 and the number of court language service requests.

Factor 2: The frequency of contact with which LEP persons come in contact with a TriMet program, activity, or service

To conduct Factor 2, this assessment focused on information generated by agency personnel, technological systems and survey research. In the context of Factor 2, “relevant programs, activities and services provided” were defined as ridership, fares and customer information as these are the means by which people use or inquire about transit services and programs.

Call Center Data

Customers who call TriMet’s Customer Service line (503-238-RIDE) can request language interpretation for 235 different languages. For the period of January 1, 2014 to October 1, 2018, the call center received 10,382 requests for language assistance, which equates to approximately 179 requests per month, or 7-8 requests per day.

Table 5 shows the most commonly requested languages by number of requests. At 70% of requests, the majority language assistance requested is for Spanish. Although Russian-speakers comprise the fourth-highest LEP population in the TriMet service area, Russian language assistance is the second-most frequently requested at 14% of language assistance orders.

Table 5: Call Center language assistance requests
Jan 1, 2014 - Oct 1, 2018

Language	Orders	Percent
Spanish	7,245	70%
Russian	1,432	14%
Arabic	318	3%
Chinese - Cantonese	328	3%
Vietnamese	289	2%
Somali	110	1%
Farsi	74	1%
Chinese - Mandarin	95	1%
Korean	115	1%
Other	376	4%
Total Language Assistance “Requests”	10,382	100%

Automated Information

Upon calling TriMet Customer Service, callers are asked if they want information in Spanish. From there, they can access Transit Tracker, fare information, or speak to a representative. The automated system logs which options were selected including how many callers requested information in Spanish.

From July 1, 2017 to June 30, 2018, there were a total of 253,103 instances logged of callers accessing Transit Tracker in Spanish, out of over 3 million total calls (or 7.2%). This represents a 73% increase in the proportion of callers selecting the Spanish language option since the last Four Factor Analysis in 2012. However, the actual volume of calls has decreased during that time for both English and Spanish speakers, likely due to more customers accessing information online, via text, and/or smart phone.

TriMet Website

TriMet's website provides basic How to Ride information in eleven languages besides English (Spanish, Vietnamese, Chinese, Russian, Korean, Japanese, Tagalog, Romanian, Somali, Arabic, Cambodian, and Persian). This includes information on fare payment, rules for riding, safety and security, accessibility, and agency contact information including interpretation services. All these pages also have TriMet's Title VI notice, complaint procedures, and complaint form in the relevant language. As TriMet has prioritized resources on serving the largest group in the LEP population, the Spanish web pages have more extensive content in addition to a Trip Planner in Spanish.

The following table shows the page views for the period June 1, 2013 to March 31, 2016. It should be noted that customers often translate other pages of the site using third party services, such as Google translate or Microsoft translator and these are not trackable. However, the translated page views give a good indication of the balance of demand for those languages provided.

Table 6. TriMet Website Translated Page View Summary
June 1, 2013 - March 31, 2016

Language	Quantity	Percent
Spanish	23,651	53%
Chinese	6,829	15%
Russian	4,985	11%
Korean	4,712	11%
Vietnamese	4,597	10%
Total	44,774	100%

2008 On-board Rider Survey

TriMet conducted an on-board rider survey in spring 2018 for the purposes of collecting information about transfers, fare payment, and demographics. The full survey was available in both English and Spanish. Those who took the survey in Spanish and English were asked a question about their native language. Riders were asked to select their native language on a tablet, and then answer a question about English proficiency in their selected language. Results are shown in Table 7, generally reflecting the population distribution with the exception of the Arabic-speaking LEP persons comprising a greater percentage than expected. Survey results also indicate that 38% of riders speak English less than very well.

Table 7. LEP respondents to on-board survey, by native language
Spring 2018

Language	Count	Percent
Spanish	633	39%
Vietnamese	127	8%
Chinese	103	6%
Arabic	67	4%
Russian	65	4%
Japanese	62	4%
Tagalog	53	3%
Korean	25	2%
Somali	23	1%
Romanian	19	1%
Persian-Farsi	16	<1%
Ukrainian	16	<1%
Cambodian, Khmer	4	<1%
Other	430	26%
Total	1643	100%

2008 Bus Operator Survey

TriMet conducted a survey of bus operators¹ to further explore the frequency of contact with LEP persons. Since bus operators are often the first contact LEP passengers have with TriMet, this research was designed to find:

- How often and on which routes operators encounter LEP passengers
- How operators communicate with LEP passengers
- What ideas operators have to improve communication with LEP passengers

¹ MAX operators were not surveyed because they have less direct interaction with riders, as they operate the train in a closed compartment.

A total of 225 bus operators were surveyed at Center Street Garage during the summer 2018 schedule sign-up. Interviewing times were spread evenly throughout the two-week sign-up process to ensure operators with varying lengths of service were represented. As a group, these operators had driven 65 of the 80 bus routes in the TriMet system in the past year.

Overall, 80% of operators surveyed indicated that they had encountered LEP riders at least a couple of times a month over the past year. Approximately 60% said they had encountered LEP riders several times a week or more. In fact, only eight out of the sixty-five routes did operators say they had never encountered LEP riders over the past year.

The bus lines where operators reported the most frequent contact with LEP riders were:

- **Line 57-TV Hwy/Forest Grove** - Connects the Washington County cities of Forest Grove, Cornelius, Hillsboro, Aloha, and Beaverton, which is the area with the region's highest concentration of Spanish speakers. Additionally, there high concentrations of LEP persons speaking Persian, Khmer, Japanese and Tagalog.
- **Line 72-Killingsworth/82nd** - Travels between Clackamas Town Center and Swan Island, traveling north and south along 82nd Ave, which has a particularly high concentration of LEP persons speaking Vietnamese, Chinese, Ukrainian, and Russian.
- **Line 6-Martin Luther King Jr Blvd** - Connects Goose Hollow, Portland City Center, N/NE Portland, Jantzen Beach and Hayden Island, via Jefferson/Columbia, Grand/MLK, and Vancouver Way, the Line 6 serves areas with high concentrations of Vietnamese, Chinese, and Romanian speaking LEP populations.
- **Line 77-Broadway/Halsey** - Travels between Troutdale and downtown Portland, serving areas with high concentrations of Spanish, Vietnamese, Russian, Ukrainian, Arabic, and Tagalog speaking LEP populations.
- **Line 73-122nd Ave** - Travels between Parkrose/Sumner Transit Center and SE 94th & Foster, the Line 73 serves a diversity of communities including LEP populations who speak Spanish, Vietnamese, Russian, Ukrainian, Chinese, and Romanian.

The Lines 57, 72, and 77 were all frequent mentions in the 2016, 2011, and 2005 iterations of the operator survey. The 2016 survey revealed Lines 20 and 4 as two additional bus lines where operators reported frequent contact with LEP riders.

- **Line 4-Division/Fessenden** - Once one of the longest routes in the TriMet system, the Line 4 traveled between St. Johns and Gresham via downtown Portland. The Line 4 was split fall of 2018. The Line 4-Fessenden serves areas with high concentrations of Spanish, Russian, and Korean. Whereas, the Line 2-Division serves a diversity of communities including LEP populations who speak Spanish, Vietnamese, Russian, Ukrainian, Chinese, Arabic, Tagalog, Japanese, and Romanian.

- **Line 20-Burnside/Stark** - As the longest route in the TriMet system, the Line 20 serves a diversity of communities including LEP populations who speak Spanish, Vietnamese, and Russian.

2018 Road and Rail Supervisors Survey

TriMet conducted a survey of road and rail supervisors. Similar to operators, road and rail supervisors can be one of the first contacts LEP passengers have with TriMet. This research was designed to find:

- How Road and Rail supervisors communicate with LEP passengers
- How often and where Road and Rail supervisors encounter LEP passengers
- What ideas Road and Rail supervisors have to improve communication with LEP passengers

Forty-two road and rail supervisors were surveyed at the Center Street Administration location in the fall of 2018. This represents more than half of the staff dedicated for these positions (63 total). As a group, these road and rail supervisors worked all 13 districts in the TriMet system in the past year. Road supervisors work the eight districts illustrated in Figure 14 as well as district 19 and 20 which are mobile units.

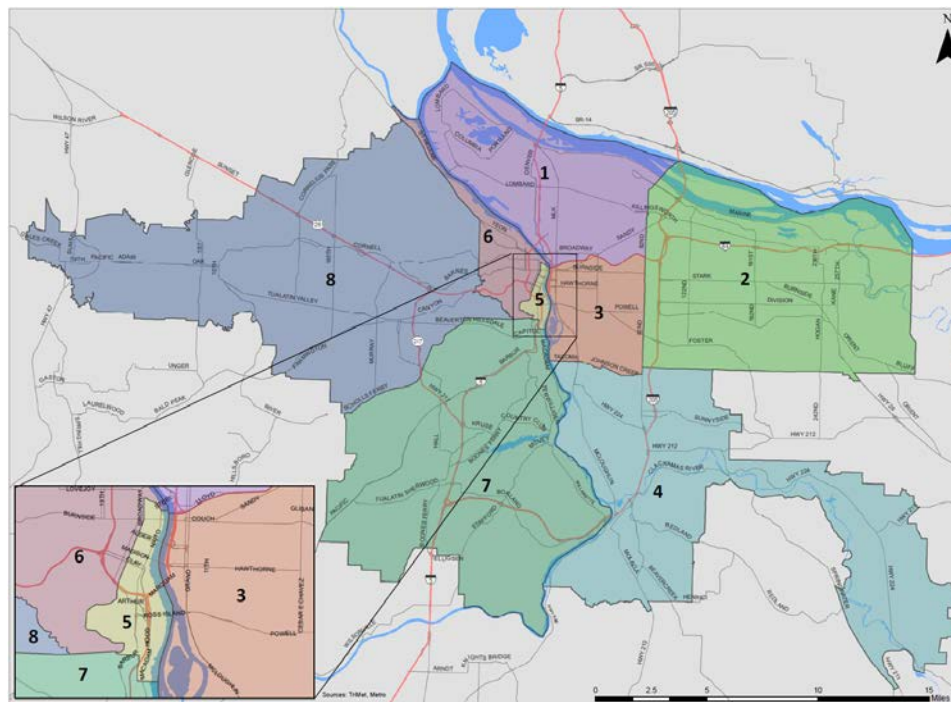


FIGURE 14: ROAD SUPERVISOR BOUNDARY AND TRIMET DISTRICT

The coverage area for rail supervisors are divided into three districts:

- Central coverage is bounded by Expo Center to the north (including the entire Yellow Line), PSU to the south (including the entire Transit Mall), Goose Hollow to the west and NE 82nd to the east (encompassing portions of the Blue Line, Green Line, and Red Line).
- Eastside coverage is bounded by Cleveland Ave. to the east, NE 82nd to the west, Portland Airport to the north and Clackamas Town Center to the south. Includes portions of the Blue, Green and Red Line.
- Westside coverage is bounded by Hatfield Government Center to the west and Washington Park to the east, encompassing portions of the Blue Line and Red Line.

Overall, 70% of road and rail supervisors surveyed indicated that they had encountered LEP riders at least a couple of times a month over the past year. Approximately 40% said they had encountered LEP riders several times a week or more. In fact, all road and rail supervisors said they encountered LEP riders in all districts over the past year.

Districts 5, 8, 6, and 9 were reported to be where road supervisors had the most frequent contact (i.e., asked for information several times a week or more) with LEP riders. Whereas, all 3 districts were comparable for rail supervisors at 43% for Central, 36% for Eastside, and 25% for Westside.

2018 Fare Survey

Finally, TriMet conducted a system-wide fare survey. A total of 267 out of 23,420 respondents were LEP. The heat map in Figure 15 illustrates the concentration of trips made by LEP riders.

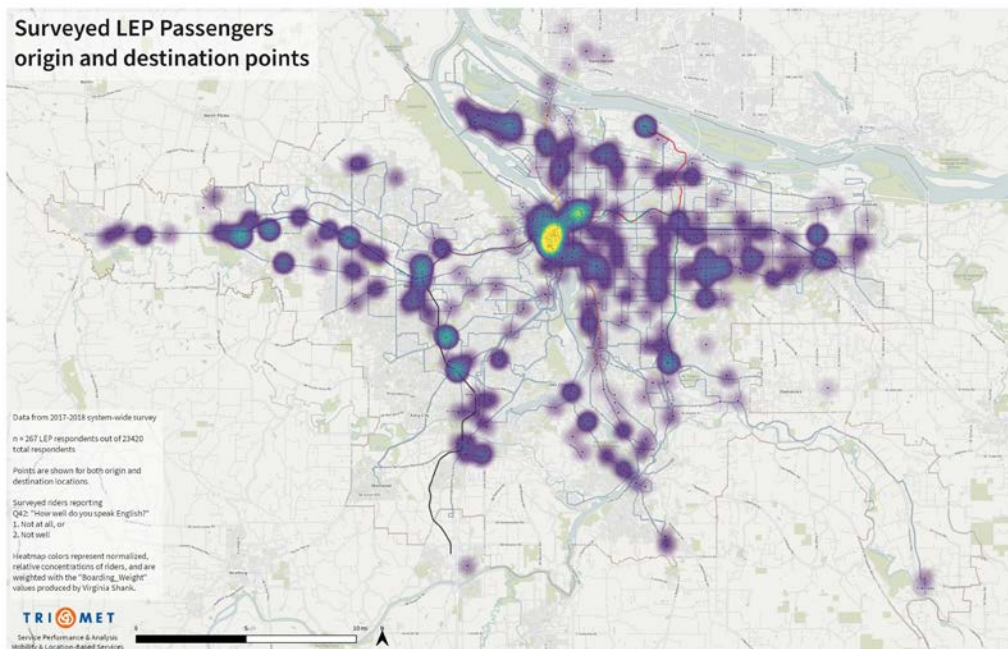


FIGURE 15: LEP CONCENTRATION OF RIDERS AND TRIMET DISTRICT

2019 Language Services Survey

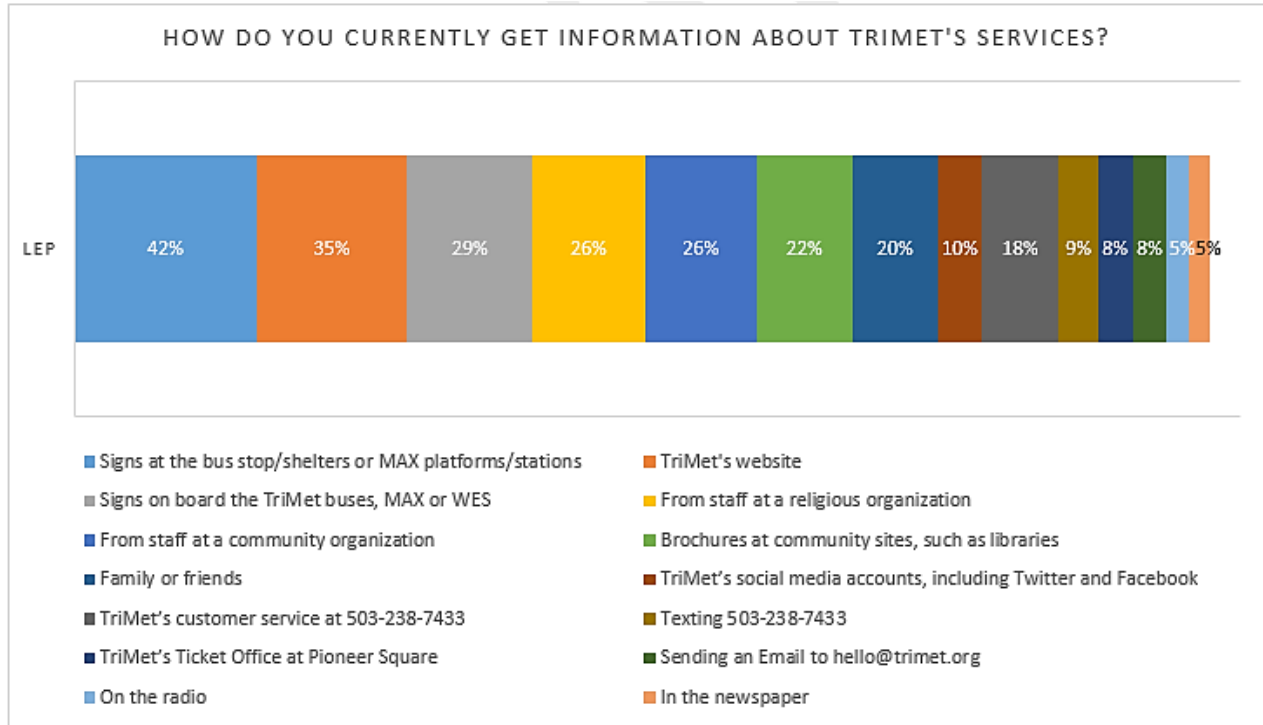


FIGURE 16: HOW DO YOU CURRENTLY GET INFORMATION ABOUT TRIMET'S SERVICES

Synthesis

The Factor 2 analysis confirmed much of what has been found previously: LEP persons have frequent contact with TriMet services and programs. One exception to this, however, is the TriMet website. But customer service language assistance data, automated calls (Transit Tracker), an on-board survey, as well as a survey of operators and road and rail supervisors indicate that LEP populations are commonly requesting information and riding TriMet vehicles.

The data shows that Spanish speaking LEP persons continue to have the most frequent contact with TriMet services. This is not surprising given that this population represents the largest portion of the LEP population, and that TriMet places a particular emphasis on providing access for Spanish speakers.

Another important finding to note is the different ways that different language speakers choose to access TriMet information, according to the data. Russian speakers more commonly call TriMet customer service than any other group besides Spanish speakers (by a significant margin), yet they comprise just the fourth-highest LEP population. On the other hand, TriMet receives relatively few requests for language assistance via phone by Vietnamese and Chinese speakers even though they comprise the second and third highest LEP populations, respectively. The implication is that there is no “one size fits all” approach to providing meaningful language assistance. Moreover, there is great importance to understand how LEP populations currently get information about TriMet’s services to help determine the allocation of agency resources. As noted in Figure 16, the top two categories where non-English speakers currently receive information is “Signs at bus stop/shelters or MAX platforms/stations” as well as “TriMet’s website”.

Factor 3: The importance to LEP persons of your program, activities, and services

TriMet has held roundtable discussions, focus groups, and other outreach events over the past several years with the goal of engaging LEP populations as to how they use TriMet and what suggestions they have for improvement. Most recently, the Transit Equity, Inclusion, and Community Affairs department administered a Language Services Survey to all 13 language groups within the TriMet service district. Additionally, bus operator as well as road and rail supervisor were surveyed to solicit information from more informal engagement with LEP riders, i.e. day-to-day interactions on-board. A summary of these various efforts is provided below, going back to 2005.

2019 Language Services Survey

The Language Services Survey full report can be accessed in the 2019 Language Access Plan. A total of 962 responses, representing 9 out of the 13 safe harbor languages, were received through various engagement efforts. One question asked in the survey that is relevant to Factor 3 is shown in Figure 16. Survey respondents indicated a high importance ranking across all question-type categories. Alternatively stated, LEP populations find it very important to important on being able to get their questions answered in their language.

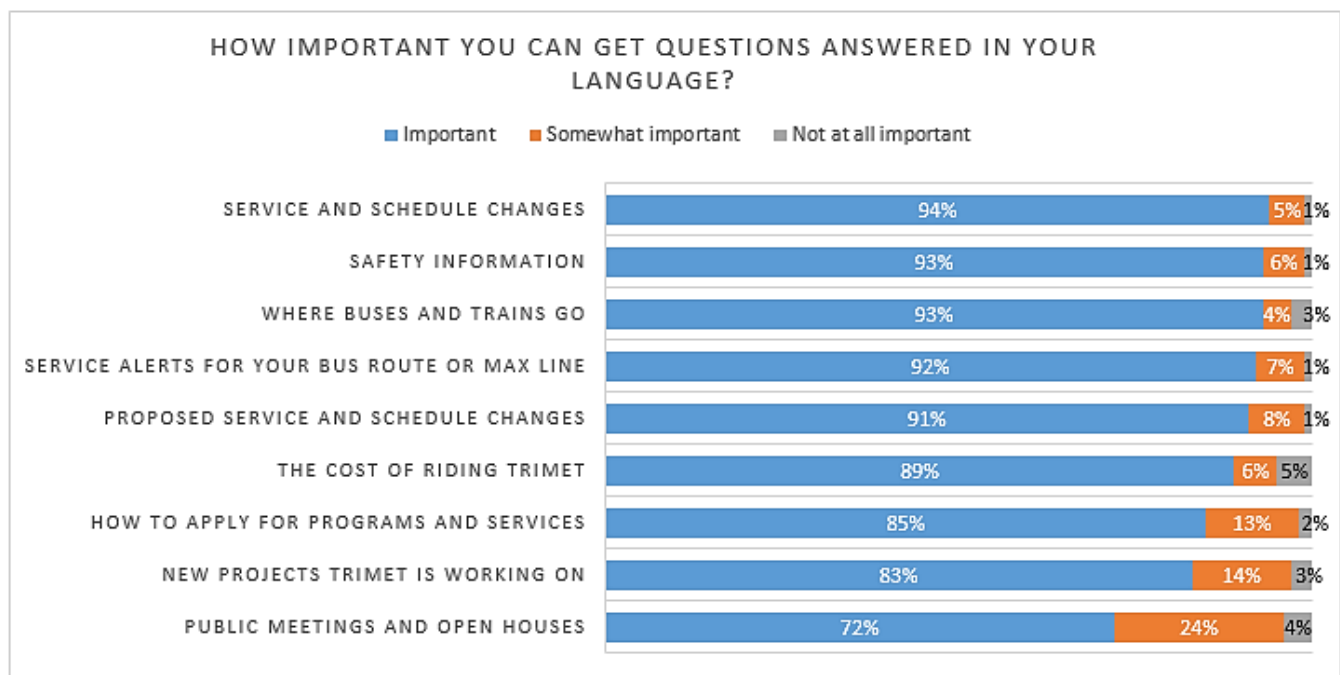


FIGURE 17: HOW IMPORTANT YOU CAN GET QUESTIONS ANSWERED IN YOUR LANGUAGE

2018 Bus Operator Survey

The results of the bus operator survey described under Factor 2 are also useful to inform Factor 3. Operators were asked about the types of questions they are commonly asked by LEP riders. Their top responses to this open-ended question were:

- How to get to their destination or building (86% of operators mentioned this).
- Which bus to take or which bus stop to use (57% of operators mentioned this).
- Questions about fares (22% of operators mentioned this).

This is consistent with findings from operator surveys conducted in 2005, 2011, and 2016.

2018 Road and Rail Supervisors Survey

The results of the road and rail supervisors survey described under Factor 2 are also useful to inform Factor 3. Road and rail supervisors were asked about the types of questions they are commonly asked by LEP riders. Their top responses to this open-ended question were:

- How to get to their destination or building (85% of operators mentioned this).
- Which bus to take or which bus stop to use (68% of operators mentioned this).
- Questions about fares (45% of operators mentioned this).

2017 Service Enhancement Plans – Washington County

TriMet contracted with JLA Public Involvement to work in partnership with community based organizations serving minority, low-income earning, and/or limited English proficiency communities to hold community meetings to discuss transit service priorities in each of the following areas of Washington County:

- Cornelius/Forest Grove
- Aloha/Beaverton
- Tigard/Tualatin/SW Portland

The meetings included five bilingual discussion groups in the following languages: Spanish, Korean, Cantonese, Somali, and Swahili. A total of 123 community members participated in the meetings. Of the participants, 102 community members submitted surveys that provided additional comments on transit improvements and demographic data.

Of relevance to Factor 3, we learned the following:

- 45% of participants were regular or frequent TriMet riders, and 8% were non-riders.
- The most common reasons given for taking TriMet were for shopping, visiting family/friends, school, and medical appointments/hospital visits.
- One-quarter of participants did not have a vehicle in the household and 44% said they usually don't have a car available.
- 59% of participants said they earned an income of \$29,999 or less in 2016.

- Riders with language barriers may have difficulty communicating with bus operators or may not be able to understand on-board announcements, which can have impacts on their travel.

2016 Service Enhancement Plans

In early 2016, TriMet partnered with community-based organizations to conduct focus group meetings with Spanish, Vietnamese, Russian, and Nepalese speakers. Staff also hosted a booth at a community “Noche Latina” event. The purpose of this outreach was to help inform a vision for future bus service in the TriMet district. It included a questionnaire to get a better understanding of how participants use TriMet as well as their needs and priorities. A total of 156 individuals participated.

Of relevance to Factor 3, we learned the following:

- 64% of participants were regular or frequent TriMet riders, and only 3% were non-riders.
- The most common reasons given for taking TriMet were for work, shopping, school, and medical appointments/hospital visits.
- One-fifth of participants did not have a vehicle in the household.
- Participants sought better access to industrial employment areas as well as extended and weekend hours to support early/late/weekend shifts.
- Riders with language barriers may have difficulty asking others to move out of priority seating, or may not be able to understand on-board announcements, which can have impacts on their travel.

2016 Fare Enforcement

As part of an effort to review practices surrounding enforcement of fare payment, TriMet partnered with several CBOs to host listening sessions on the topic in summer 2016. Two of these listening sessions were held in Spanish, and another was in English with Vietnamese interpretation as most participants spoke Vietnamese. A total of 58 persons participated between these three events, most of whom spoke limited English.

Of relevance to Factor 3, we learned the following:

- Upon first arrival in the U.S./Portland for immigrant and refugee populations, TriMet is relied upon heavily to meet transportation needs. However, navigating the TriMet system and understanding the rules for riding (including fare payment) are made difficult by language barriers.
- Some voiced concerns about discrimination against Hispanic/Latino riders, with participants suggesting more training and more information for the community in Spanish.

2015 Electronic Fare

In advance of migrating to an electronic fare (eFare) system, TriMet held discussion groups to assess potential impacts of such a change. One of these groups was held in Spanish, while two others were held in English with Spanish, Arabic, Somali, and Nepali interpretation. A total of 41 LEP persons participated in these discussions.

Of relevance to Factor 3, we learned the following:

- LEP participants voiced some concerns about language barriers to registration of smart cards under the new system.
- Some were concerned about law enforcement/immigration implications of the associated database holding customer information.
- As with non-LEP community members, many LEP participants were looking forward to using the new eFare system, with some concerns about logistics.

2011 Spanish Focus Groups

Four focus groups were conducted in Spanish and held at locations in Clackamas, Washington, and Multnomah counties. The sessions were hosted by community organization and organized by an independent contractor. A moderator facilitated the groups and participants spoke in Spanish while staff from TriMet observed and listened to the interactions through the use of a simultaneous interpreter. Most participants (as was the case in 2005) said they were dependent and relied on transit for almost all their travel in the region. In addition, there was limited knowledge of language assistance that could be accessed by calling 503-238-7433 (RIDE). Most participants showed a high level of awareness of the informational channel cards in Spanish found in TriMet’s bus and rail vehicles. Other findings were similar to those identified in 2005. LEP customers who are new to the area and/or don’t understand English well, or have limited literacy in their own language rely heavily on family, friends and trusted community organizations to help them find their way.

2008 Spanish-speaking Community Leaders Gathering

In 2008, the LEP program convened key community leaders working with Spanish speaking LEP constituents to review TriMet information pieces, icons and technology offerings to determine usefulness to LEP populations. This group was facilitated by TriMet’s LEP outreach coordinator. The group consisted of 21 participants representing the following organizations: Latino Network, Victory Outreach Community Services, Centro Cultural of Washington County, Ministerio Hispano St. Anthony Church, Santos Futbol Club, El Programa Hispano, Proyecto Unica, Multnomah County Library-Latino Outreach, MEChA, Padres Hispanos Escuelas Públicas de Portland, Instituto de los Mexicanos en el Exterior (IME), Centro Baltazar Ortiz, Hacienda CDC, and Multnomah County Sun Schools. As a result of the input and continued involvement of the group as “community advisors”, major improvements were made to printed materials, web content, and customer service telephone assistance.

2005 Community Roundtables

Four roundtables were initially conducted in 2005– two in Spanish, one in Russian, and one in Vietnamese. Discussions were led by a member of each community and interpreters were available for TriMet staff. Results from these LEP community roundtables indicated that:

- TriMet programs and services were very important to LEP community members as most said they were transit dependent² and relied on transit for almost all of their travel in the region (work, school, visiting, shopping, etc.)

² Transit Dependent: I don’t have a car available to use, or I can’t drive / don’t know how to drive

- The primary frustrations LEP customers experienced using TriMet were consistent with those experienced by other TriMet riders such as: late buses, pass-ups, concerns for personal safety, rude employees, fares, confusion over zones boundaries, and transfers. However, language barriers inhibited satisfactory resolution of LEP customer issues.
- Most participants were unaware of the language services TriMet has to offer. Thus, few had ever made use of those services.
- Many LEP customers were new to the country and/or don't understand English well, they relied heavily on family, friends and trusted community organizations to help them adapt and find their way.

Synthesis

A consistent finding from these efforts has been that there are many LEP persons who rely on TriMet to meet their transportation needs, especially those who do not have other means of transportation. This includes a significant number of LEP customers who rely on TriMet's LIFT Paratransit service, which serves those who are unable to fully utilize fixed route transit.

Concerns and feedback from LEP riders largely mirrors that of non-LEP populations, with the exception of language barrier issues. Such barriers can effectively compound frustrations with the TriMet system as LEP riders may not always receive explanations for operational problems in their language of origin, and may feel limited in terms of providing feedback to TriMet. This highlights the importance of continually striving to make LEP riders aware of available language assistance services and to translate important communications.

Factor 4: The resources available to TriMet and costs to provide LEP assistance

To conduct Factor 4, TriMet assessed the resources available for LEP assistance, the cost of providing those resources, and awareness of our bus operators of these resources.

Resources and Costs

TriMet reviewed the language assistance services it has provided since the last Four Factor update in 2012 and the associated costs for each. Figures are shown in Table 8.

Table 8. LEP Spending FY 13-19*

Item	Total
Telephone Interpretation	\$268,613
In-person Interpretation	\$88,210
Brochures/literature	\$48,633
Customer surveys	\$30,523
Document Translation	\$12,989
Channel Cards	\$7,656
Newspaper Ads	\$6,925
Civil Rights Signage	\$745
Total	\$464,294

** Not including staff labor*

TriMet provides a variety of resources to support the needs of LEP customers. Telephone interpretation in 235 languages is available upon request when customers call TriMet customer service. In-person interpretation is provided upon request for community engagement, and TriMet also holds special focus group or other outreach events with the intent of engaging LEP individuals, as discussed under Factor 3. Beyond translation of vital documents, TriMet works to provide materials in multiple languages for programs or projects when significant LEP populations are potentially impacted. One example of this is the development of Service Enhancement Plans by subarea of the TriMet district, for which fact sheets were translated into languages that had high LEP populations in each subarea.

In all, the cost of providing these resources is approximately \$464,294 since July 2012, with the largest portion coming from telephone interpretation services (about 58% of the total). With document translation, costs incurred include both the translation and additional production of printed materials. TriMet also commonly advertises in non-English newspapers in an effort to reach LEP persons.

What is not accounted for in Table 6 is the staff costs incurred in working to provide access to LEP individuals. Various staff from Operations, Policy & Planning, Transit Equity, Inclusion, & Community Affairs, Customer Information Services, Creative Services, Communications, and Engineering & Construction are often involved in these efforts, as TriMet strives to find creative ways to address the diverse customer base it serves, in particular LEP riders.

Additionally, many staff have skills that serve as a non-quantifiable resource for LEP riders. Of the 225 bus operators surveyed, 36% indicated that they spoke a language besides English. The majority of this group speaks Spanish, with Chinese and Japanese as the next two most common languages spoken. About 32% of multilingual operators say they use the non-English language they speak at least several times a week. Of the 42 road and rail supervisors surveyed, 50% indicated that they spoke a language besides English. The majority of this group speaks Spanish, with Arabic as the next most common language spoken. About 33% of multilingual operators say they use the non-English language they speak at least once per day or more.

Awareness of Resources

When operators were asked if they were aware of any materials, services, or tools that TriMet uses to communicate with LEP riders, only 38% said they were. The most common service mentioned was telephone language interpretation, followed by the TriMet website and channel cards in Spanish. Thirty-seven percent of operators said they felt equipped to communicate with LEP riders and 26% noted that it depends on the language spoken by the passenger (89% indicated they were equipped to communicate with passengers that spoke Spanish). The remaining 36% noted they did not feel equipped to communicate with LEP passengers.

When road and rail supervisors were asked if they were aware of any materials, services, or tools that TriMet uses to communicate with LEP riders, more than three-quarters (76%) said they were. The most common service mentioned was telephone language interpretation, followed by the TriMet brochures (non-specific) and employees/passengers who speak another language. Most road and rail supervisors (77%) said they felt equipped to communicate with LEP riders and less than one-third said they did not.

Equally as important in understanding staff awareness of resources are LEP population’s awareness of TriMet’s services for non-English language services. Figure 17 illustrates the level of awareness for LEP populations. The highest percentage of awareness is “Signs in Spanish on TriMet vehicles and at TriMet stations” at 45% followed by “Materials/brochures in your language” at 31 percent.

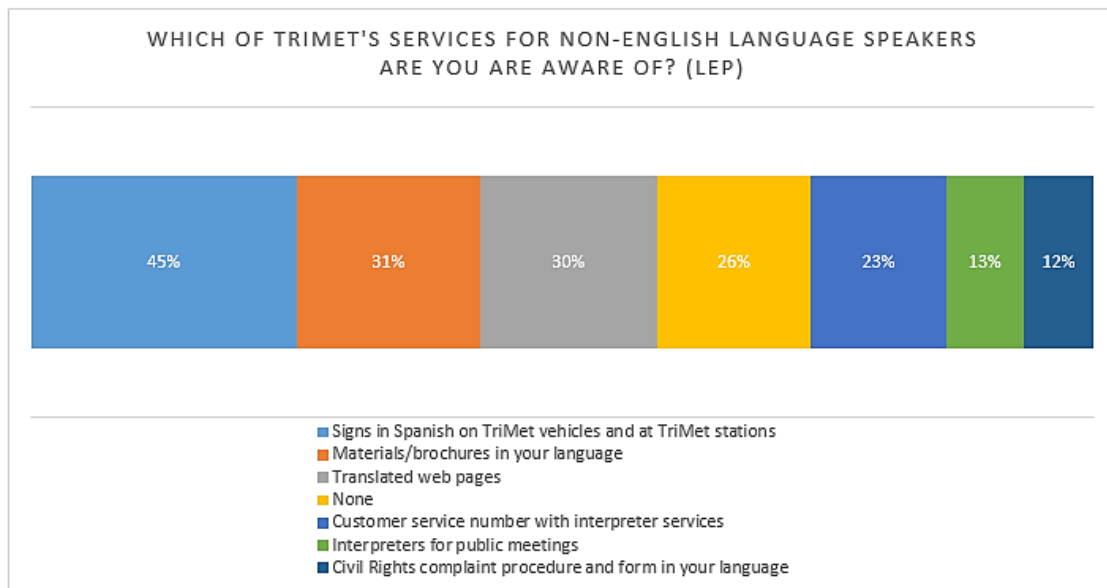


FIGURE 17: HOW IMPORTANT YOU CAN GET QUESTIONS ANSWERED IN YOUR LANGUAGE

Conclusions

TriMet is committed to full compliance with Title VI and Executive Order 13166 to provide meaningful access to programs, services and benefits for persons with Limited English Proficiency. This updated Four Factor Analysis will guide TriMet efforts to retain successful program and activities designed to meet the language needs of LEP populations, and identify new areas of focus to further the agency's goal of providing LEP customers with meaningful access to TriMet programs and services.

The following conclusions are drawn from this Four Factor Analysis:

1. A significant number of LEP individuals live in the TriMet service district, and at least 13 languages meet the "safe harbor" threshold of at least 1,000 LEP persons (Spanish, Vietnamese, Chinese, Russian, Korean, Ukrainian, Japanese, Tagalog, Romanian, Arabic, Mon-Khmer Cambodian, Persian/Farsi, and Somali).
2. TriMet is an important service for many LEP persons, as evidenced by relatively high rates of transit dependence, high ridership frequency, and the variety of transit trips taken.
3. Various LEP populations access information in different ways, so engagement and communications should be adapted based on what is most effective for each language or culture.
4. For LEP customers, resolving customer concerns can be hindered by the language barriers between them and agency personnel.
5. TriMet uses considerable resources to provide language assistance, but should work to increase awareness of available resources among riders and front-line staff.
6. Reliance on trusted sources for information underlines the importance of growing and maintaining personal relationships within the LEP communities.
7. Initiating, maintaining, and strengthening relationships with community organizations that serve LEP populations is important because they provide help to new arrivals as they adapt and find their way in the region.

Appendix A: Language Access Survey Report

Language Access Plan

2019 LANGUAGE ACCESS SURVEY REPORT

Transit Equity, Inclusion, and Community Affairs Department
TRIMET | 1800 SW 1ST AVENUE | PORTLAND, OR 97201

Executive Summary

Limited English Proficiency is a diverse category that spans across different linguistic and cultural groups. Although there are common barriers in terms of accessing information about the system, there are also specific concerns that are unique to each of the language groups surveyed. Based on what was learned through this process, staff would like to emphasize there is not a one size fits all approach when it comes to engaging communities of various LEP backgrounds. In order to have effective and clear communication and access, it is important to take these issues into account when choosing and designing outreach methods.

Key Findings

1. TriMet is an important service for many LEP persons.
2. Various LEP populations access information in different ways, so engagement and communications should be adapted based on what is most effective for each language or culture.
3. Almost all LEP respondents indicated they speak, read, and understand English less than very well. This leads to potential barriers for language groups to access service and program related materials.
4. For LEP customers, resolving customer concerns can be hindered by the language barriers between them and agency personnel.
5. TriMet should work to increase awareness of available language access resources among LEP riders. Reliance on trusted sources for information underlines the importance of growing and maintaining personal relationships within the LEP communities.
6. Initiating, maintaining, and strengthening relationships with community organizations that serve LEP populations is important to expand upon efforts to ensure TriMet is providing meaningful access to its' programs and services.
7. Most LEP communities find information about the system on the system. Further engagement opportunities should explore what information they gather and how they interpret it.
8. Digital respondents wanted more info in digital format, in person respondents wanted more information on the system and at CBOs.
9. Safety and security – a call for more security. Low knowledge of what to do in case of an emergency.
10. Driver interaction was highly important to customer satisfaction. Many request were made for more courteous and/or bilingual drivers.

Acknowledgements

TriMet staff would like to thank the various community organizations that serve LEP populations throughout the Tri-County area. Without their support, the vast number of survey responses would not have been achieved. The information collected and insight gained will undoubtedly improve TriMet's ability to serve LEP populations as well as increase their access to TriMet's services and programs. Key organizations include the following:

Asian Pacific American Network of Oregon	African Family Holistic Health Organization
Asian Health and Services Center	Bienestar
Catholic Charities	Centro Cultural
Consulado Mexicano	El Programa Hispano Catolico
Hacienda CDC/Baltazar Community Center	Immigrant & Refugee Community Organization
Latino Network	Portland ESL Network
Verde	

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Attachment 1: Language Services Survey Instrument

I. Background

Dating back to 2005, TriMet has held roundtable discussions, focus groups, and other outreach events with the goal of engaging Limited English Proficiency (LEP) populations as to how they use TriMet and what suggestions they have for improvement. Most recently, the Transit Equity, Inclusion, and Community Affairs department administered a Language Services Survey to “safe harbor¹” language groups within the TriMet service district. The main goal of this survey was to support the update of TriMet’s Language Access Plan. This plan demonstrates TriMet’s commitment to make our transit system accessible and welcoming to all.

This report documents the survey results, key findings, staff recommendations for the agency at large as well as the lessons learned throughout the survey administration process.

II. TriMet Title VI Compliance

As a recipient of Federal Transit Administration (“FTA”) financial assistance, TriMet must ensure that service changes – both increases and reductions – comply with Title VI of the Civil Rights Act of 1964, which states:

“No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

The FTA has provided specific implementing guidelines and regulations for complying with Title VI in Circular 4702.1B (“Circular”). TriMet is committed to full compliance with the Circular, Title VI and Executive Order 13166 to provide meaningful access to programs, services and benefits for persons with limited English proficiency, or LEP.

III. Survey Instrument Design

Martin González led the development of the survey instrument and survey methodology with assistance from Nathan Jones, Mariya Klimenko, John Gardner, Wendy Serrano, and Carl Green Jr. This core workgroup contributed to reviewing and editing drafts of the survey instrument, survey approach, survey administration, and survey collection.

IV. Methodology

A 24-item survey instrument was translated into all 13 “safe harbor” languages. Surveys were distributed in-person, direct email, and through targeted Facebook ads. The LEP engagement period started February 21, 2019 and ended May 17, 2019. A total of 962 surveys were collected. Staff from the Transit Equity, Inclusion, and Community Affairs (TEICA) department distributed the surveys in-

¹ Language groups that meet the Department of Transportation definition of LEP “Safe Harbor” thresholds. The thresholds are 5 percent of total population or 1,000 individuals, whichever is less.

person by attending an immense number of community events and meetings. Through built partnerships with key organizations and established relationships with community leaders, TEICA staff received support from the following key organizations: Latino Network, Verde, El Programa Hispano, Centro Cultural, Consulado Mexicano, Immigrant & Refugee Community Organization (Slavic Advisory Board), and Asian Health and Services Center. Staff contacted other community organizations and public entities working with Spanish speaking folks via telephone and via e-mail. TEICA staff shared the survey with key individual from the following organizations: Voz Worker Education Project, Consulado Mexicano, Mandos Mundo, Oregon Latino Action Agenda, Oregon Latino Health Coalition, OPAL, Educate Ya, American Friends Service Committee, Multnomah County Library, Multnomah County Health Department, Los Niños Cuentan, Gresham School District, Portland Public Schools ESL and Dual Language Immersion Programs, Hispanic Metropolitan Chamber of Commerce, Human Solutions, Central City Concern, Transition Projects, Virginia Garcia Clinic, Adelante Mujeres, Lara Media, Hispanic Pros, Rosewood Initiative, Archdiocese of Portland Ministerio Hispano, Portland ESL Network, etc.

TEICA staff made presentations and surveyed Spanish-speaking parents participating at Latino Network Juntos Aprendemos Programs at the following schools:

- Ventura Park Elementary
- Mill Park Elementary
- Shaver Elementary
- Cesar Chavez Elementary
- Glenfair Elementary
- Tualatin Elementary
- Harvey Scott Elementary
- Rigler Elementary
- Tigard Elementary
- Bridgeport Elementary

Staff also made presentations and surveyed participants in the Latino Network's program Soñemos Juntos, Bienestar's Equipo of Service Providers, El Programa Hispano Catolico, meetings at the Asian Health and Service Center and IRCO Senior Lunch as well as participants at a group gathering at the Baltazar Ortiz Center, Mill Park School Pantry, Madison High School Pantry, Shaver Food Pantry, and the Open Bible Harvest Share. Lastly staff participated with the survey at Consulado Mexicano's Ventatilla Financiera event, and at Cinco de Mayo in Portland.

V. Survey Results and Findings

A. Demographics

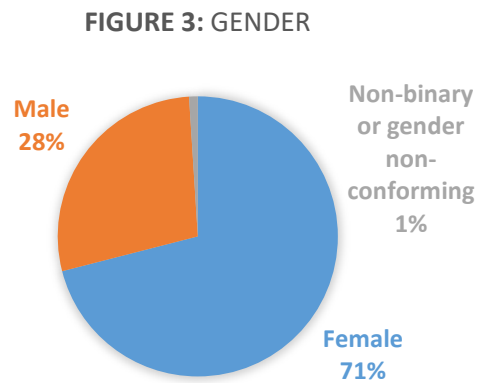
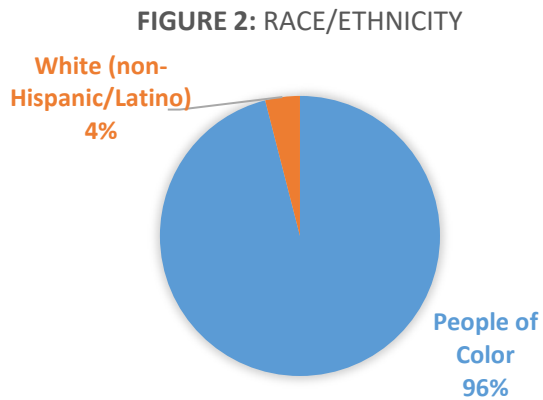
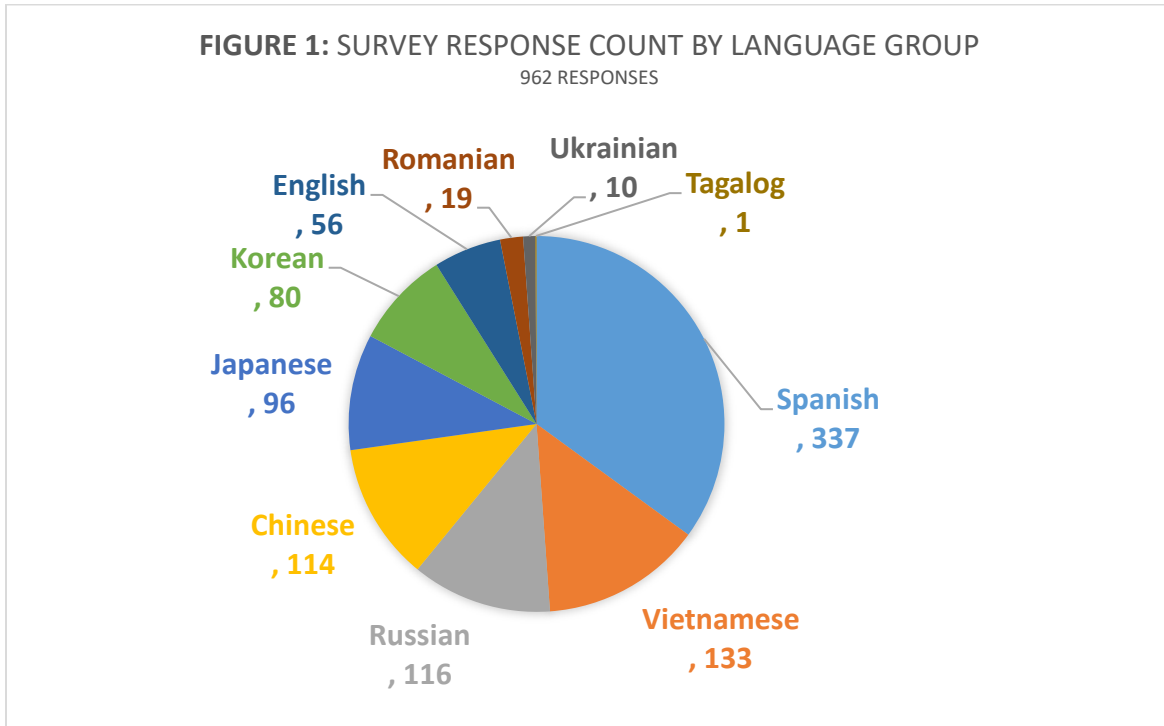


FIGURE 4: LEP POPULATION BY SERVICE ENHANCEMENT PLAN AREAS

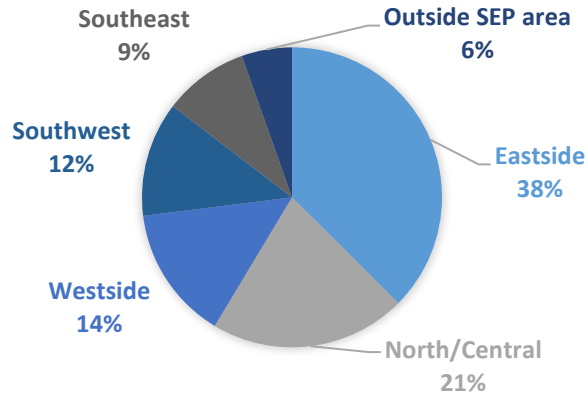


FIGURE 5: TRANSIT RIDER STATUS

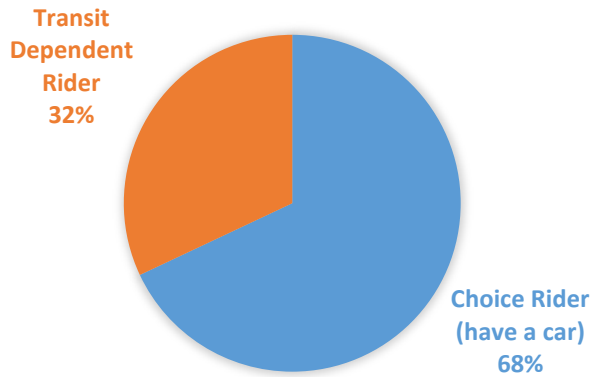
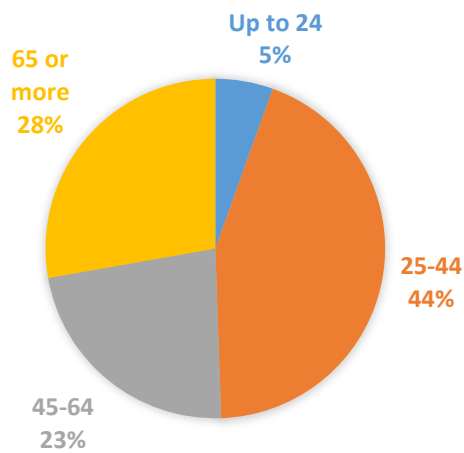


FIGURE 6: AGE DISTRIBUTION BY LANGUAGES COMBINED



B. LEP Assessment

LEP refers to persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all.

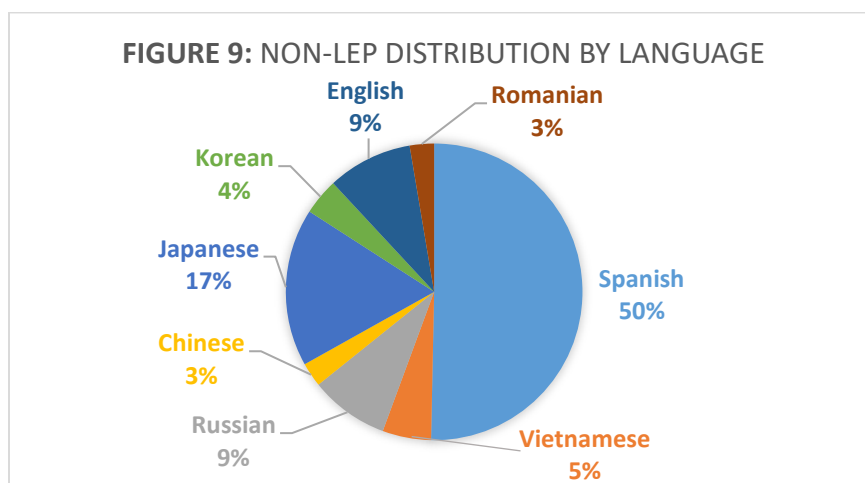
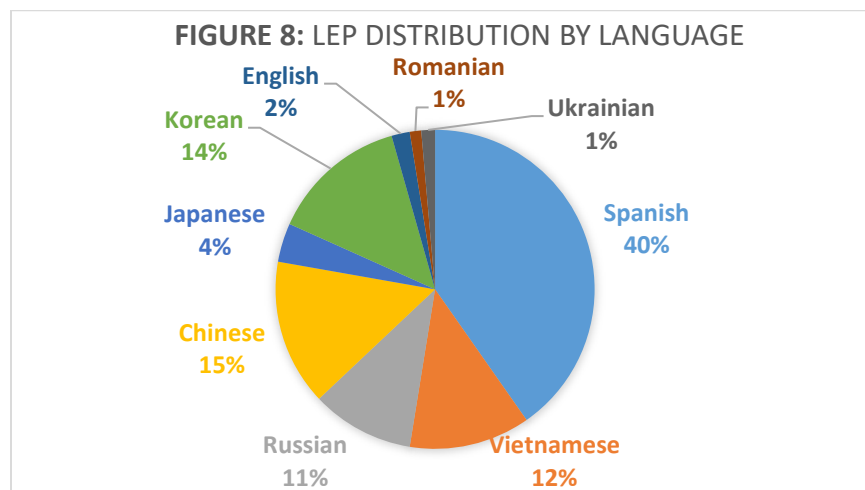
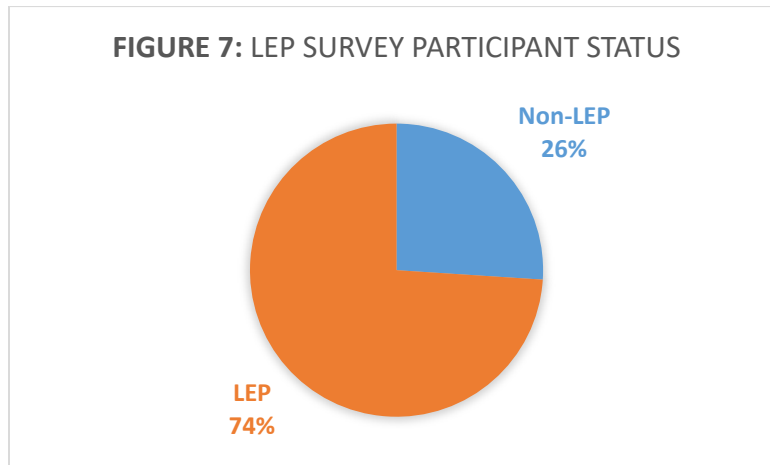


FIGURE 10: HOW WELL DO YOU READ ENGLISH? (LEP)

Very Well Less Than Very Well

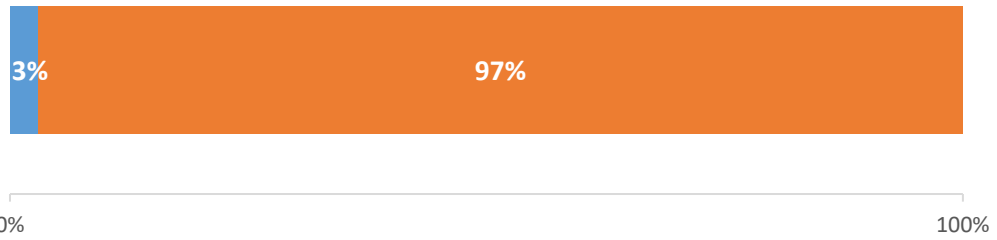


FIGURE 11: HOW WELL DO YOU SPEAK ENGLISH? (LEP)

Very Well Less Than Very Well

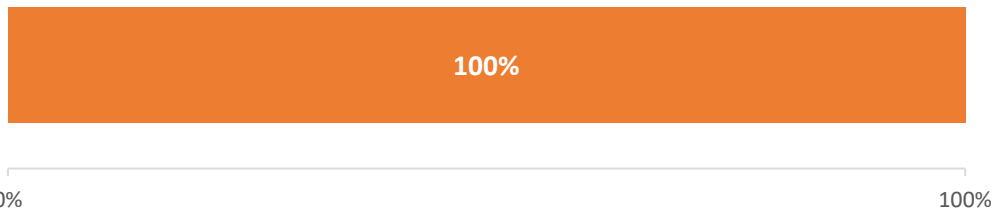
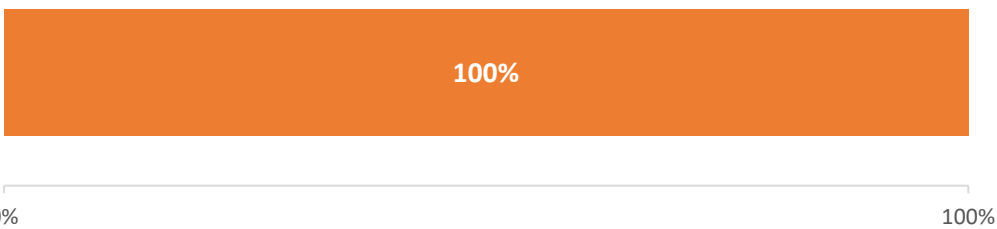


FIGURE 12: HOW WELL DO YOU UNDERSTAND ENGLISH? (LEP)

Very Well Less Than Very Well



C. Information Access and Language Services Awareness

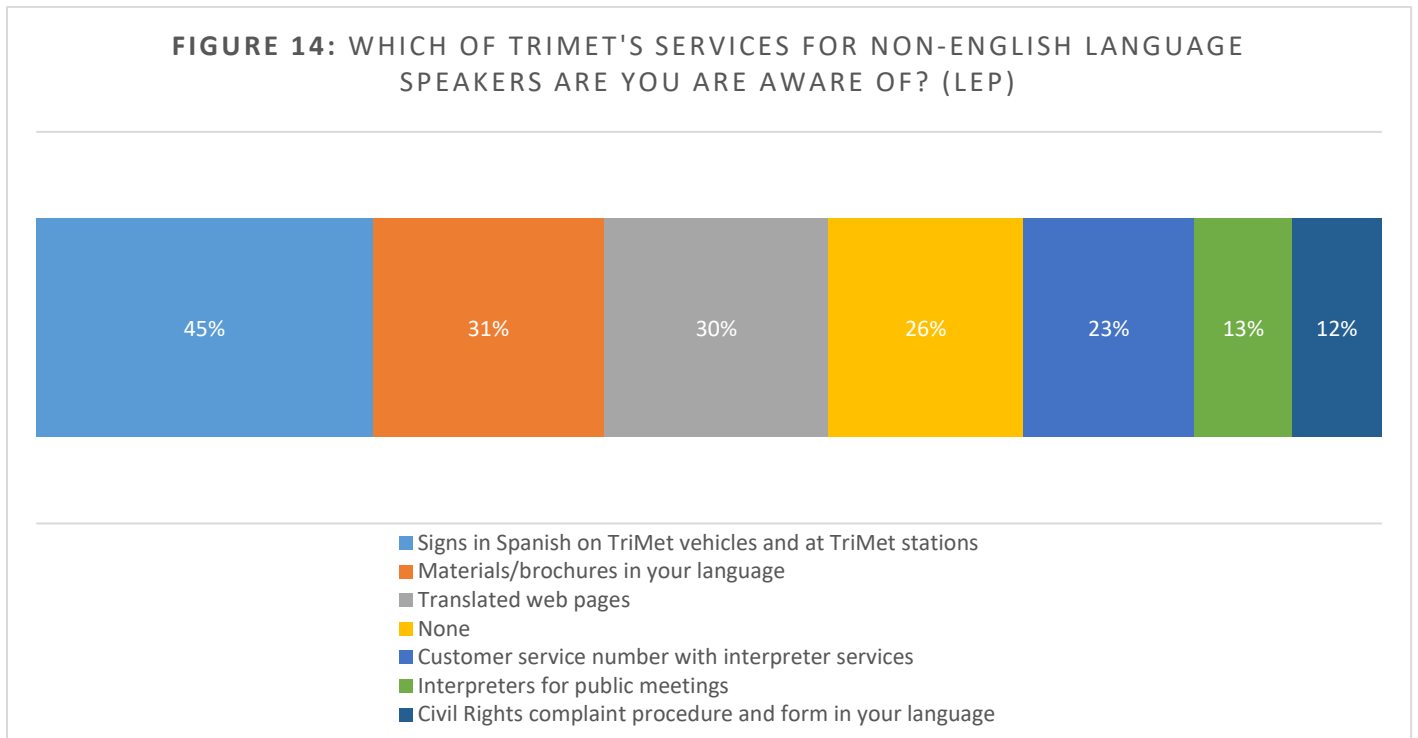
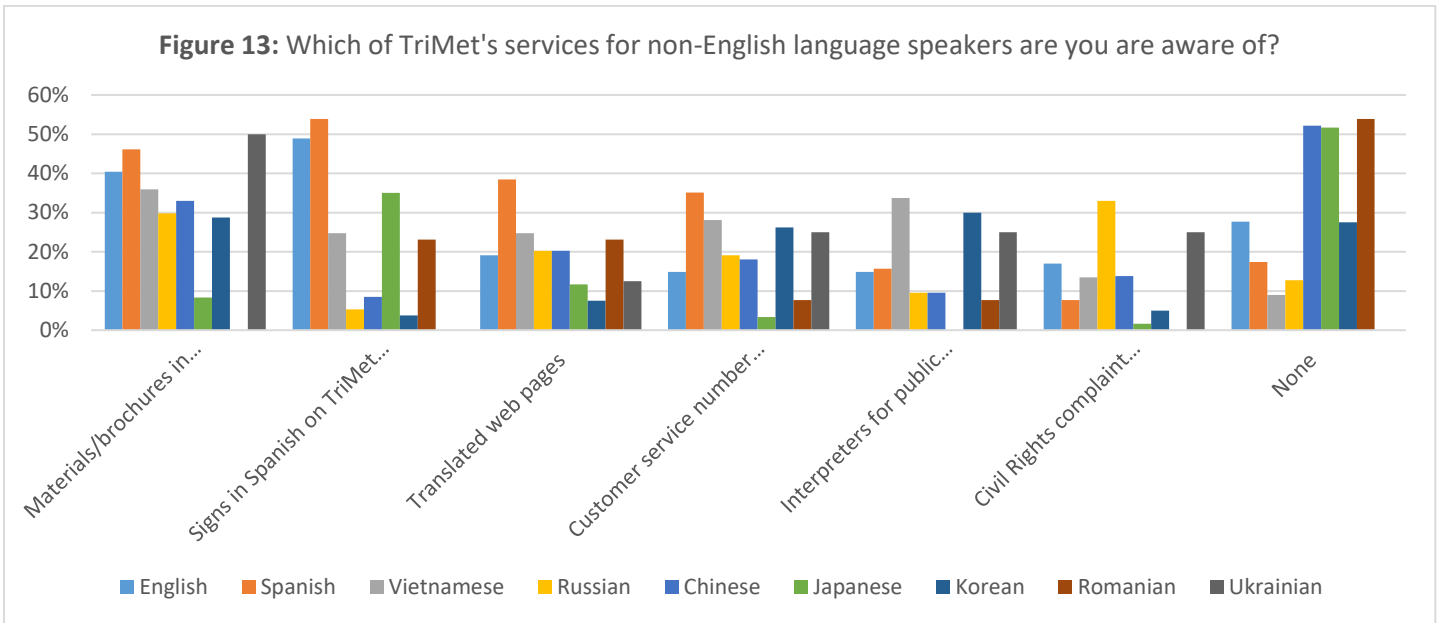


FIGURE 15: HOW DO YOU CURRENTLY GET INFORMATION ABOUT TRIMET'S SERVICES?

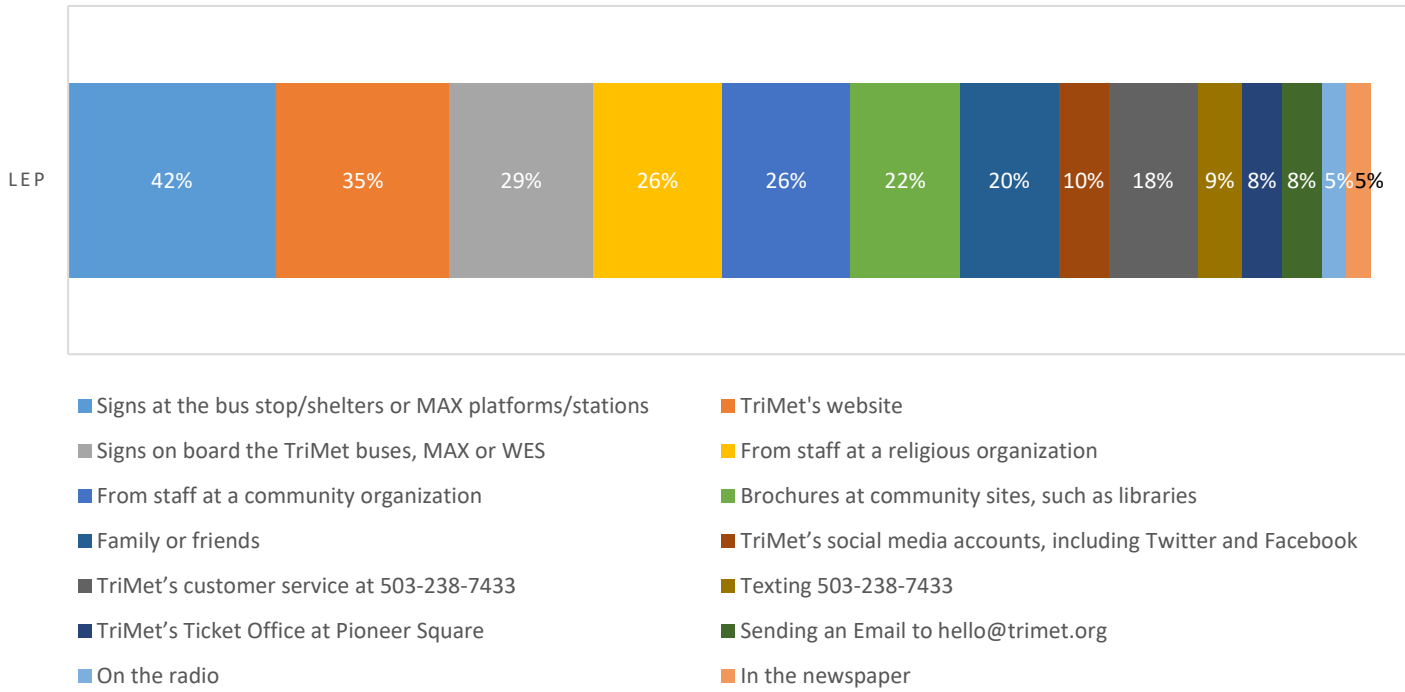
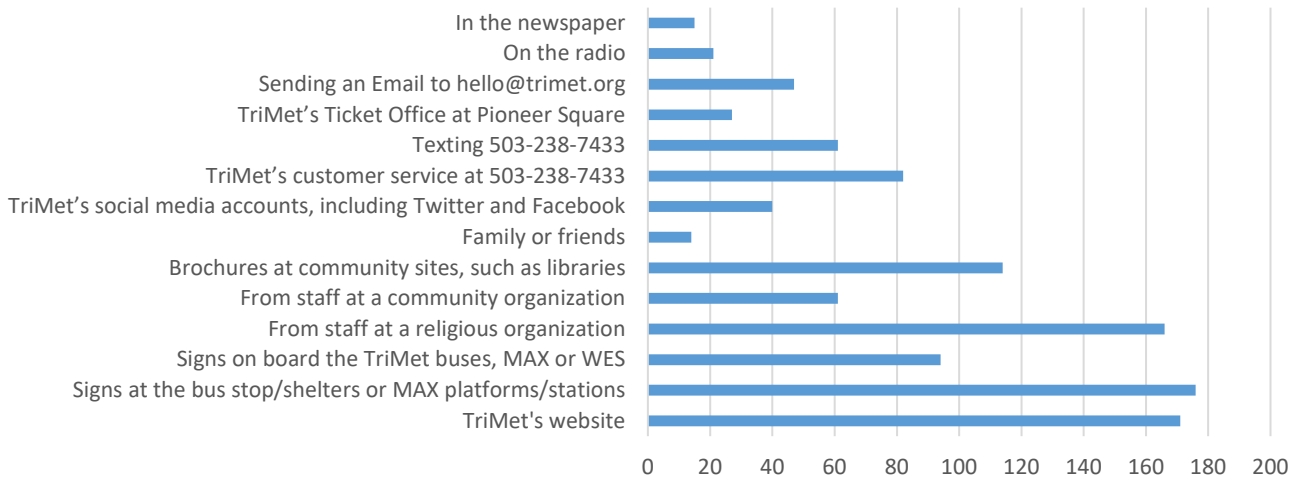


Figure 16: HOW DO YOU CURRENTLY GET INFORMATION ABOUT TRIMET'S SERVICES? SPANISH



**Figure 17: HOW DO YOU CURRENTLY GET INFORMATION ABOUT TRIMET'S SERVICES?
VIETNAMESE**

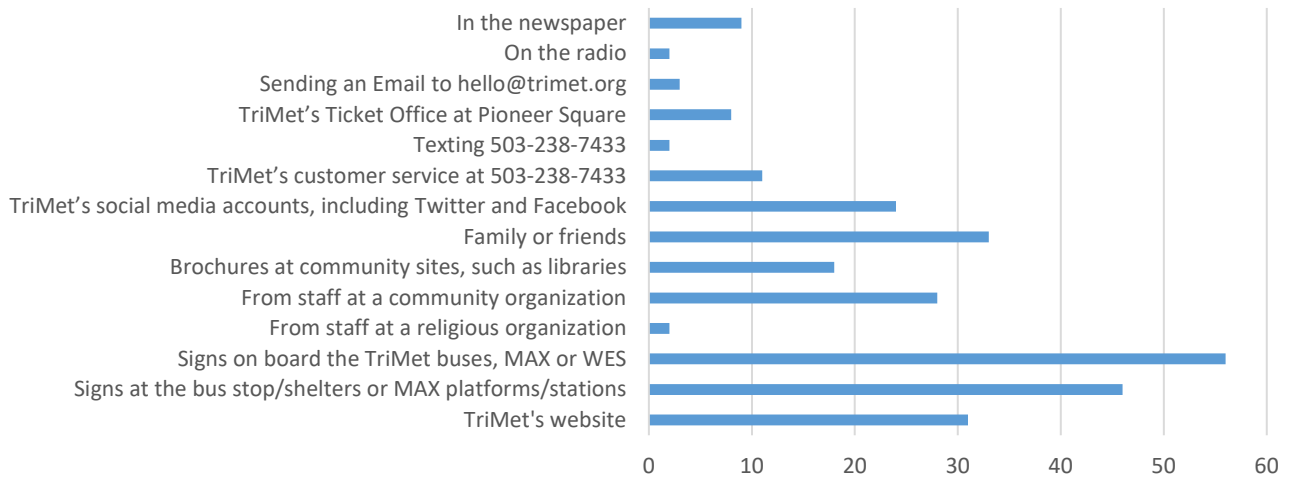


Figure 18: RUSSIAN

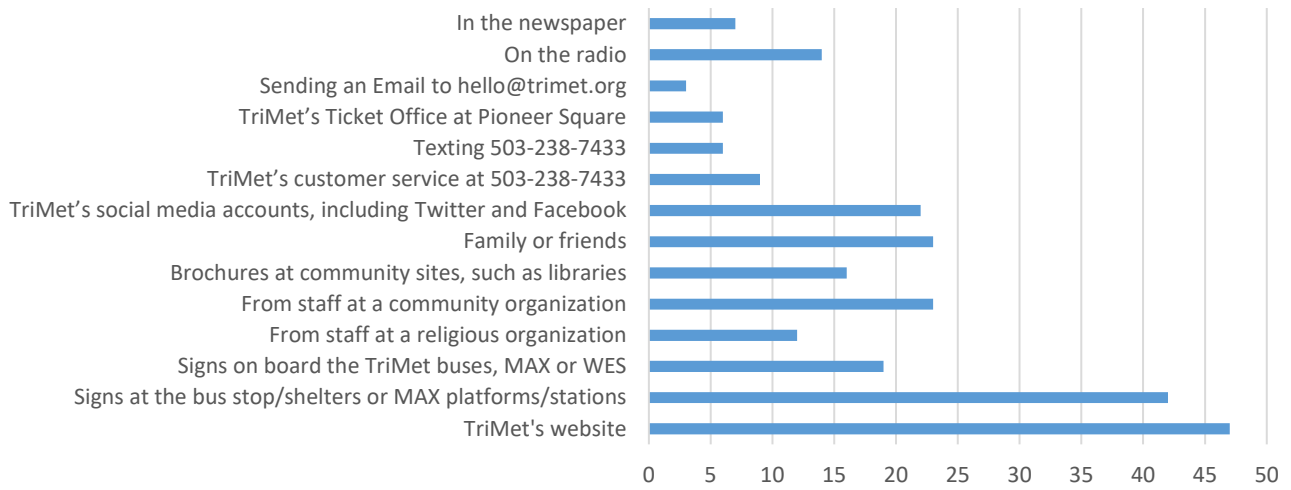


Figure 19: CHINESE

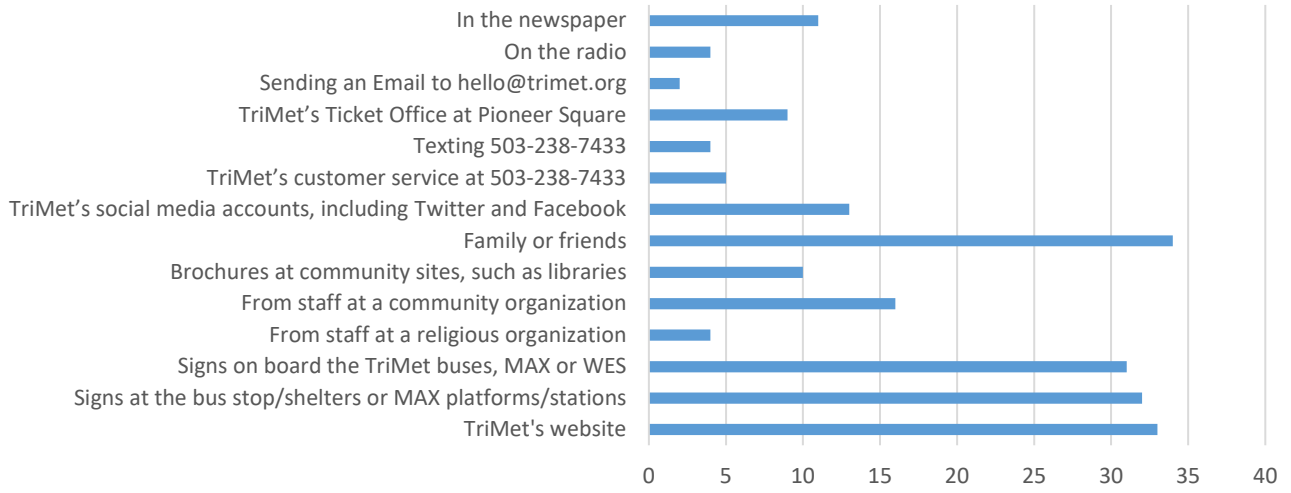


Figure 20: JAPANESE

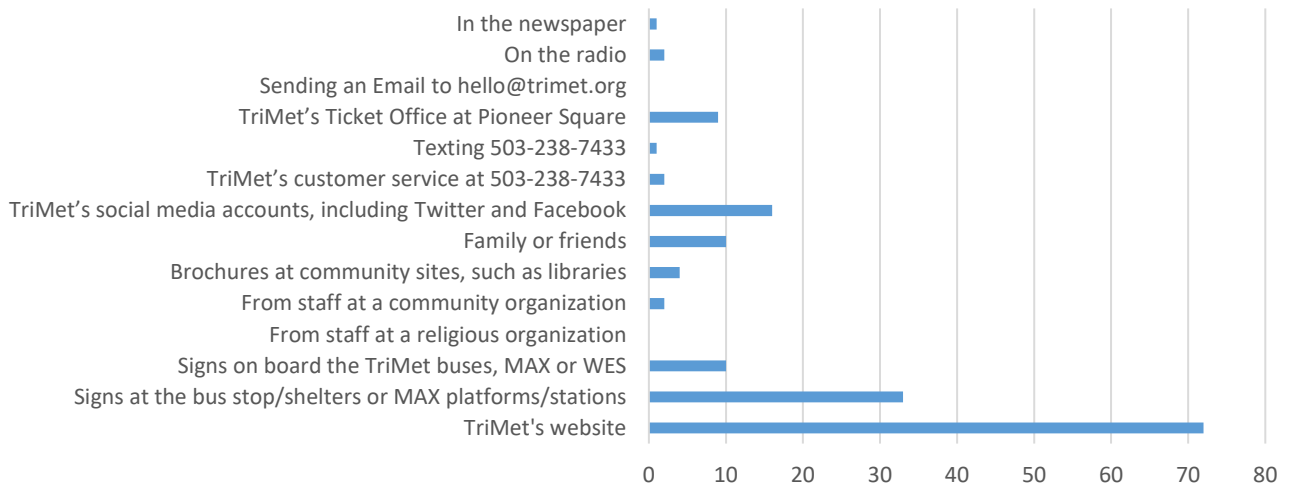


Figure 21: KOREAN

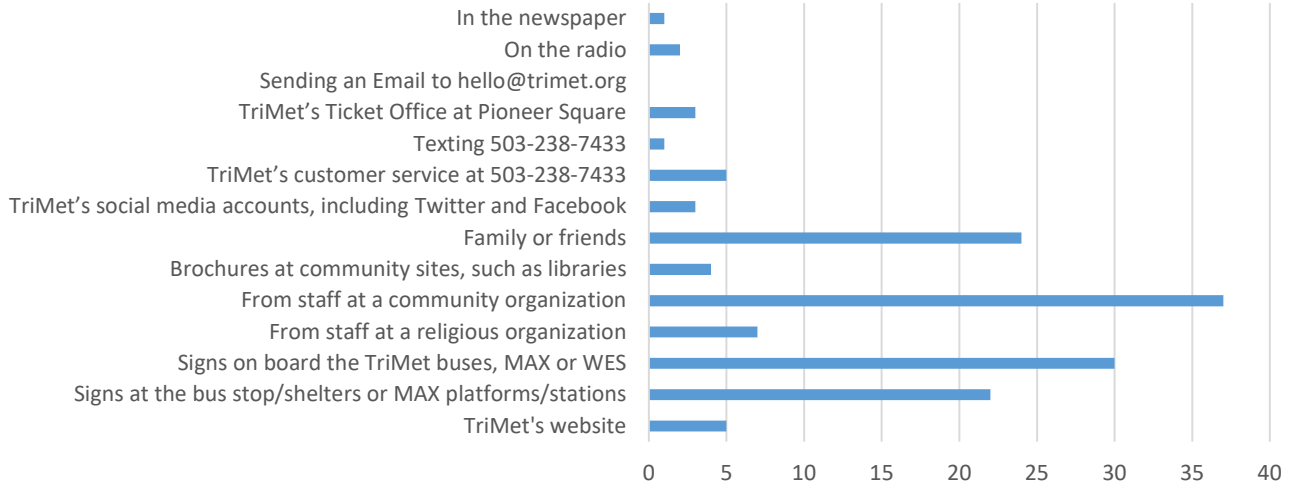


Figure 22: ROMANIAN

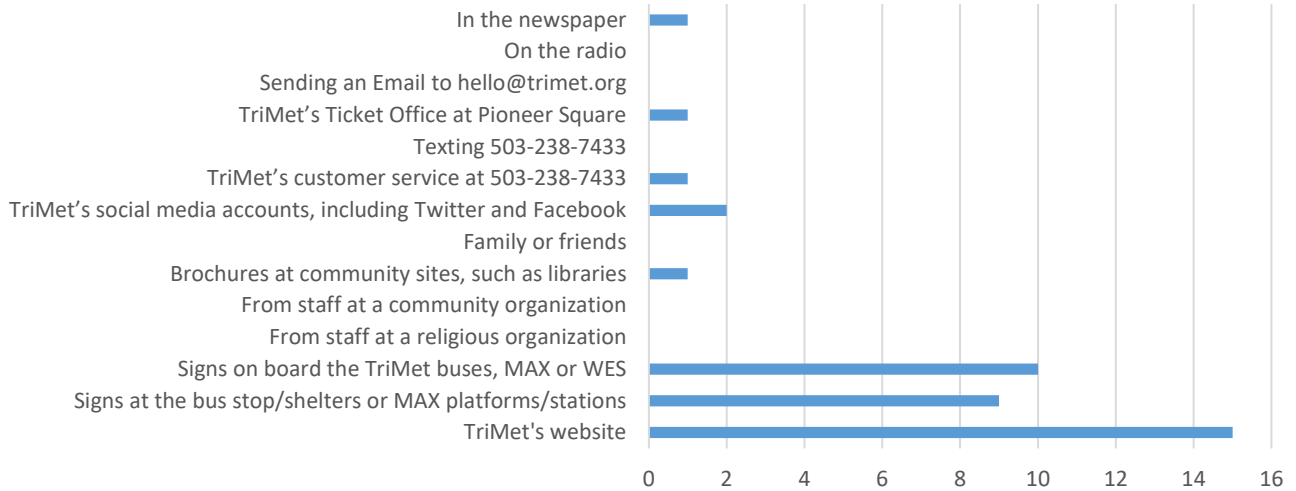


Figure 23: UKRAINIAN

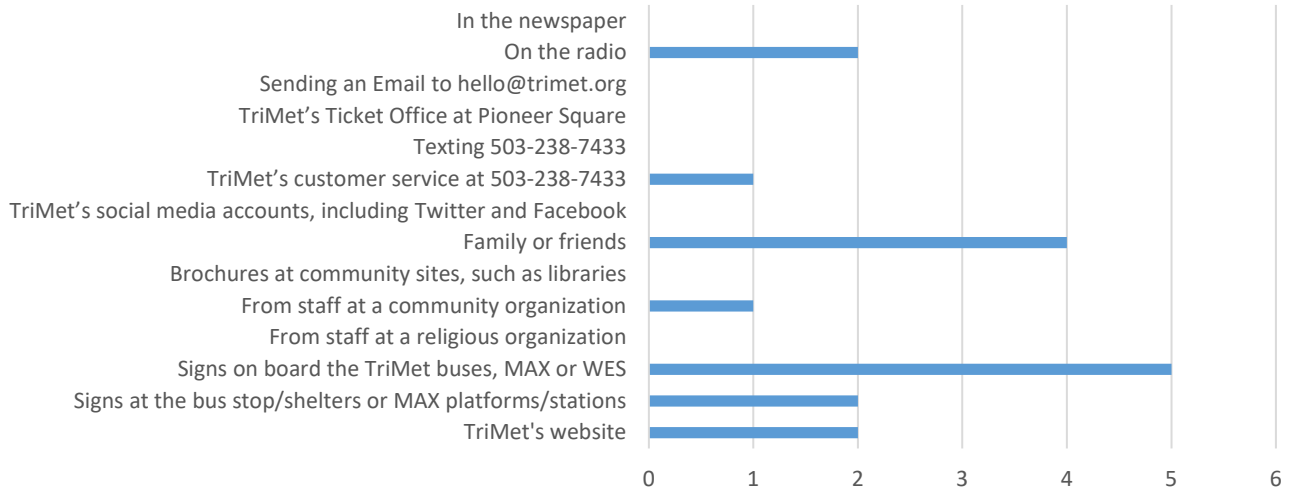
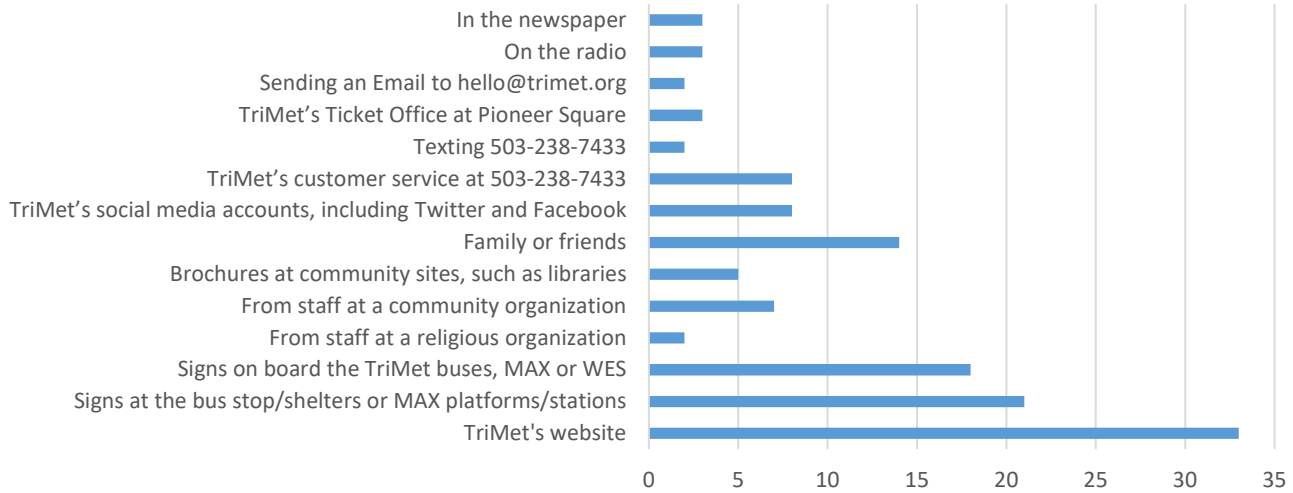
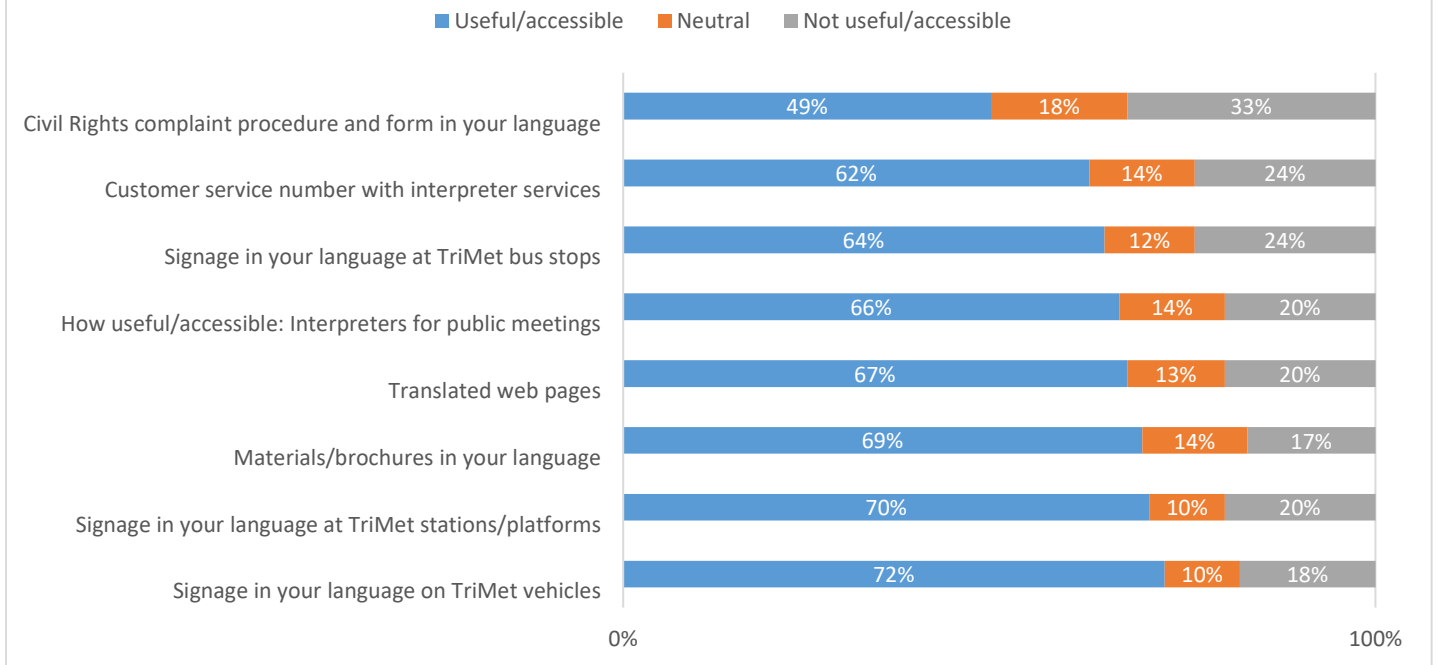


Figure 24: ENGLISH



D. Usefulness/Accessibility

Figure 25: How useful/accessible are TriMet's language access services?



E. Language Services Image Favorability

Participants were asked to select which of the images below best communicated that TriMet language services are available. A total of 558 responses were received.

Figure 26



(24%)



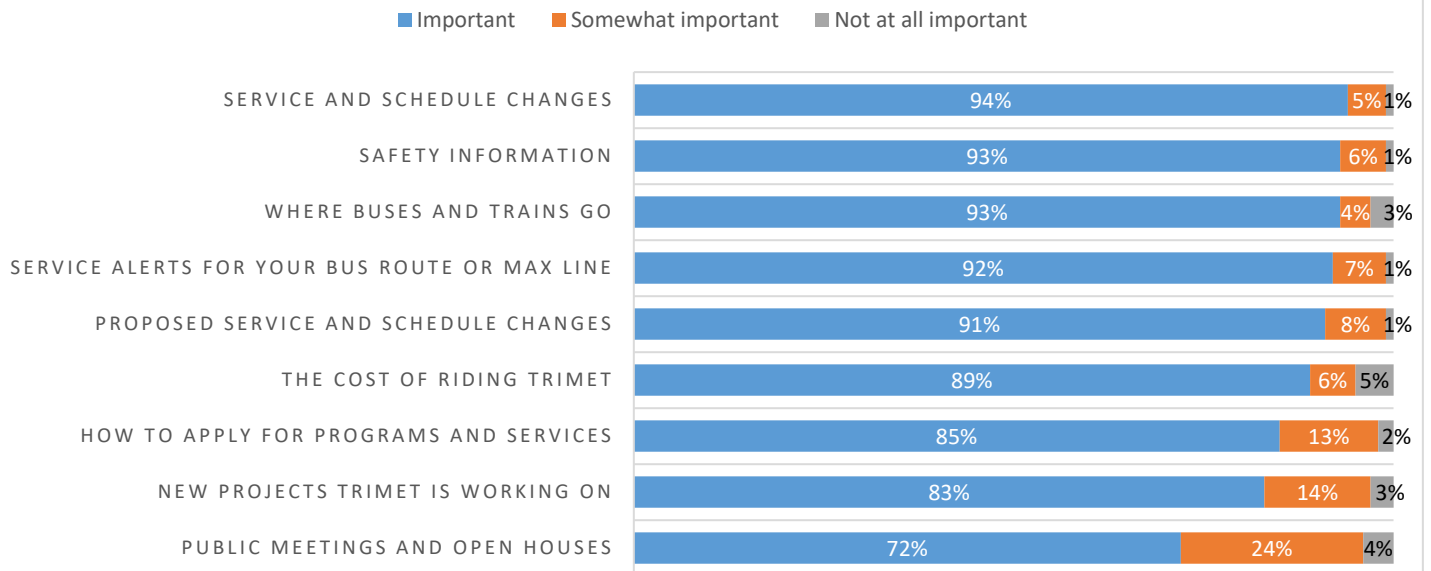
(8%)



(68%)

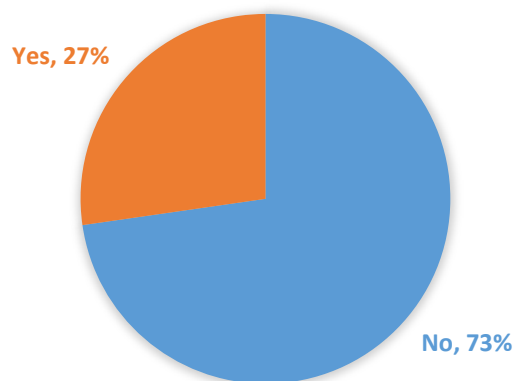
F. Receipt of TriMet Information in Native Language by Level of Importance

FIGURE 27: LEVEL OF IMPORTANCE OF RECEIVING ANSWERS (IN YOUR LANGUAGE) TO YOUR QUESTIONS IN THE FOLLOWING AREAS

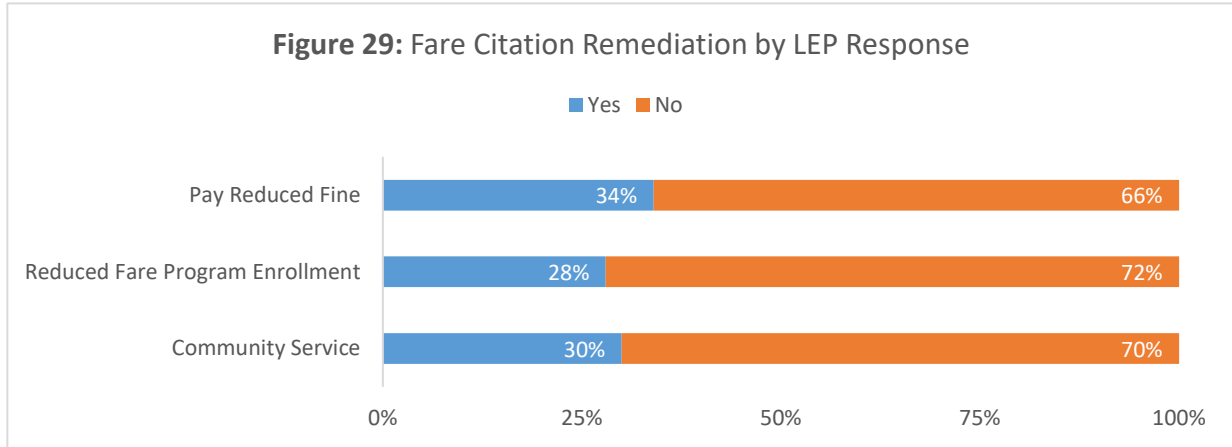


G. Onboard Vehicle Emergency Awareness

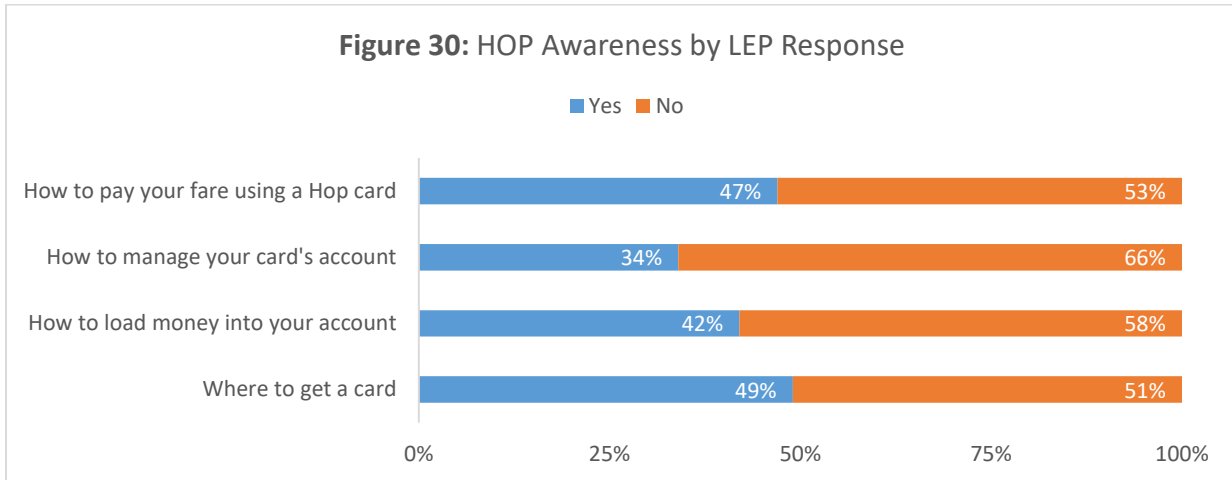
FIGURE 28: DO YOU KNOW WHAT TO DO IN CASE OF AN EMERGENCY WHILE ONBOARD A TRIMET VEHICLE? (LEP)



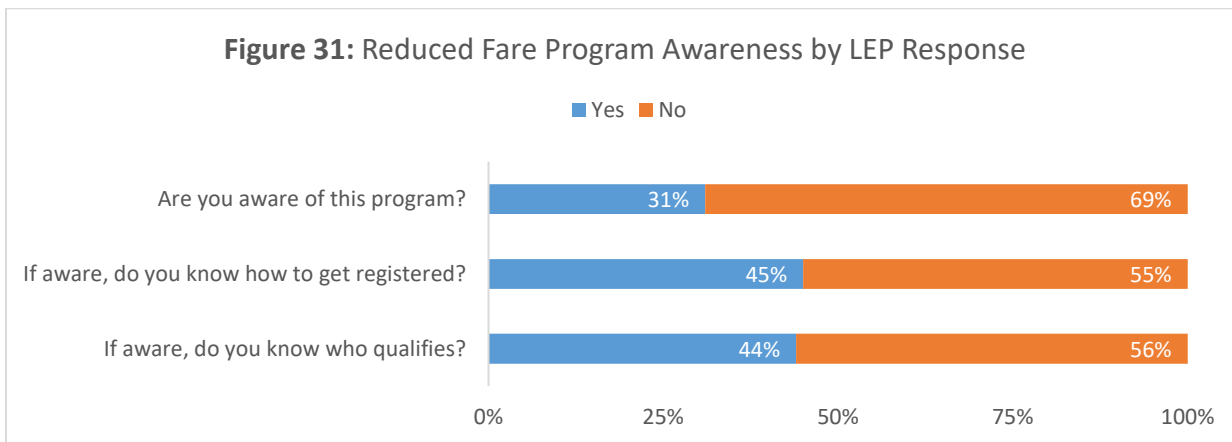
H. Administrative Citation Awareness



I. HOP Program Awareness



J. Reduced Fare Program Awareness



VI. Summary of Findings

Staff from the Department of Transit Equity, Inclusion, and Community Affairs launched a Language Access Services survey on February 21, 2019. The survey period ended on May 17, 2019. Surveys were distributed via in-person, direct email, and through targeted Facebook ads. Specifically, staff attended over 30 community partner events and engaged with over 900 event attendees. The type of events ranged from parent classes at various elementary schools, luncheons, advisory board meetings, low-income housing, food pantries, culturally-specific events, and places of worship.

The intention behind the surveys were to further understand the best ways to engage and inform limited English proficient populations about TriMet's programs and services, to gauge LEP populations awareness and accessibility of TriMet's current language access services, how and where they currently obtain information about these services as well as what is the best methods for receiving information.

Overall, there was a low to moderate awareness across all TriMet language services for non-English language speakers as in indicated in Figure 13. Alternatively stated, almost all language service category had less than 50% awareness for each language group with the exception of Spanish indicating that 54% have an awareness of "Signs in Spanish on TriMet vehicles and at TriMet stations". Furthermore, there is substantial differences between language groups awareness of TriMet's services. For instance, Romanian, Japanese, and Korean had a relatively high percentage of responses indicating they were not aware of any services that TriMet provides. Moreover, all language groups' awareness of "TriMet's translated web pages" and "Customer service number with interpreter services" were below 30% with the exception of Spanish at 38% for web pages and 35% for interpreter services.

As shown in Figure 14, the aggregation of LEP responses for the question "Which of TriMet's services for non-English language speakers are you aware of?" indicated that 45% were aware of "Signs in Spanish on TriMet vehicles and at TriMet stations", 31% were aware of "Materials/brochures in your language", and 30% were aware of "Translated web pages". The remaining categories were below 30 percent.

When asked, "How do you currently get information about TriMet's services", the top categories as shown in Figure 16 were "Signs at the bus stop/shelters or MAX platforms/stations", "TriMet's website", and "Signs on board TriMet vehicles". A subsequent question was asked how useful are TriMet's language access services? Figure 26 depicts that the most useful and accessible was "Signage in your language on TriMet vehicles" and "Signage in your language at TriMet stations/platforms". Respondents were also asked, "How important you can get questions answered in your language". As noted in Figure 28, it is significantly important to receive answers across all questions, such as service and schedule changes, safety information, where buses and trains go, and service alerts.

Survey respondents were asked about their awareness of onboard vehicle emergency procedures as well as TriMet programs, such as administrative citation process, the new electronic fare system called Hop Fastpass™, and the new reduced fare program. As indicated in Figures 29-34, LEP respondents had a moderately low awareness of these programs or what to do if they had to respond to an emergency onboard a TriMet vehicle.

Lastly, the Language Access Survey provided participants with the opportunity to give response through several open-ended questions. There was an overwhelming amount of feedback across various languages and communities requesting more digital interaction in their language. The most popular platforms were

social media (Facebook), email, web applications and websites as mediums that can help those communities stay up to date with TriMet's service and programs in their own primary language. Another popular theme amongst languages was having materials and presentations available in community based organization. This was particularly true with senior populations from the Korean community.

TriMet staff also identified three major common themes when asked about ways to improve safety on the system: 1) increase operator training, particularly in learning how to interact with limited English proficient customers; 2) increase security on the system by having more staff presence and; 3) increase surveillance on the system. When asked how to make customers feel more welcomed on the system feedback requested that correct translations were highly important as well as seeing more diverse and bilingual TriMet staff.

VII. Recommendations

Develop and implement the initiatives below with a high degree of public involvement to ensure that TriMet is providing the needed information in areas where it is accessible to various language groups.

Initiatives should include:

- Language Assistance brand and awareness campaign that focuses on TriMet infrastructure (On-board and at stations). This could involve the deployment of language specific "Ask Me" staff in addition to signage.
- Create resource and information hubs at CBO locations. Resource select partners through the Multicultural Outreach Contract or other opportunity.
- Improve digital engagement and information sharing. Continue to explore and invest in targeted social media promotions and information sharing.
- Identify what information people are looking for and in what places they look through further public involvement.
- Use the available spaces on the TriMet system to create information that LEP people can access in their language.
- Develop and test materials with target audiences before mass distribution.
- Build out staff training regarding how to serve LEP riders and the resources available.
- Focus on educational campaigns for fare administration, LIF, and Hop to create better market saturation for programs.
- Conduct more frequent and targeted surveys to explore the effectiveness of information strategies in achieving increased awareness of issues such as safety and security, Hop, and the Low Income Fare.
- Hire more bilingual and/or bicultural staff.
- Institute more regularly scheduled and ongoing focus groups and other opportunities for LEP community members to provide more in-depth feedback.
- Formalize an external Community Advisory Committee and allocate resources to support it.

Attachment 1: Language Services Survey Template



As part of our commitment to access, equity, and inclusion, TriMet is conducting a survey to help update our Language Access Plan.

This plan outlines how TriMet will address the needs of riders whose primary language is not English. TriMet is committed to a public transportation system where all are welcome. Your participation will help us achieve this goal.

1. How do you currently get information about TriMet’s services?

- TriMet’s Customer Service at 503-238-7433
- TriMet’s website
- TriMet’s Ticket Office at Pioneer Square
- Sending an email to **hello@trimet.org**
- Texting 503-238-7433
- TriMet’s social media accounts, including Twitter and Facebook
- Signs at the bus stop/shelters or MAX platforms/stations
- Signs on board the TriMet buses, MAX or WES
- On the radio
- In the newspaper
- Brochures at community sites, such as libraries
- From staff at a community organization
- Family or friends
- From staff at a religious organization
- Other (please specify) _____

2. What are the best ways for TriMet to share information with you?

3. Which of TriMet’s services for non-English Language speakers are you aware of? Check all that apply.

- Customer service number with interpreter services
- Translated web pages
- Interpreters for public meetings
- Materials/brochures in your language
- Signage in Spanish on TriMet vehicles and at TriMet stations
- Civil Rights complaint procedure and form in your language
- Other (please specify) _____

4. On a scale of 1 to 5, with 5 being the highest, rank how useful/accessible these services are to you.

Customer service number with interpreter services	1	2	3	4	5
Translated web pages	1	2	3	4	5
Interpreters for public meetings	1	2	3	4	5
Materials/brochures in your language	1	2	3	4	5
Signage in your language on TriMet vehicles	1	2	3	4	5
Signage in your language at TriMet stations/platforms	1	2	3	4	5
Signage in your language at TriMet bus stops	1	2	3	4	5
Civil rights complaint procedure and form in your language	1	2	3	4	5

5. In addition to providing services in your language, what else can TriMet do to make you feel welcome and included?

6. TriMet is looking for an image that to communicates that languages services are available. Which of the images below communicates that most clearly?



7. How important it is that you can get information or answers to questions about each of the following from TriMet in your primary language?

	Not at all	Somewhat Important	Important	Very Important
The cost of riding TriMet	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Where buses and trains go	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Service and schedule changes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Proposed service and schedule changes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Service alerts for your bus route or MAX line	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
New projects TriMet is working on	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Safety information	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Public meetings and open houses	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
How to apply for programs and services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

8. How can TriMet improve your safety while onboard our buses and trains?

9. Do you know what to do in case of an emergency while onboard a TriMet vehicle? Yes No

10. Fare is required to ride TriMet vehicles. If you receive a citation for riding without fare, do you know about the following options to resolve it?

Community Service Yes No Pay Reduced Fine Yes No
Enroll in a Reduced Fare Program Yes No Request an Appeal Hearing Yes No

11. We recently launched a new electronic fare system called Hop Fastpass. Do you know the following?

Where to get a card Yes No How to manage your card's account Yes No
How to load money into your card Yes No How to pay your fare using a Hop card Yes No

12. Since July 2018, TriMet began offering a reduced fare program for riders with lower incomes. This program lowers fares by 50% to 72%.

Are you aware of this program? Yes No Do you know how to get registered? Yes No
Do you know who qualifies (eligibility requirements)? Yes No

13. What is your primary language?

English Українськи (Ukrainian) Română (Romanian)
 Español (Spanish) عربي (Arabic) Somali (Somali)
 Tiếng Việt (Vietnamese) Tagalog (Tagalog) Other (please specify) _____
 中文 (Chinese) 日本語 (Japanese)
 Русский (Russian) ខ្មែរ (Mon-Khmer, Cambodian)
 한국어 (Korean) فارسی (Persian-Farsi)

14. How well do you read, speak, or understand English?

	Very Well	Well	Not Well	Not at All
Read	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Write	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Understand	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

15. How many people are in your household (including you)? 1 2 3 4 or more

16. What was your total annual household income before taxes in 2018? (check one)

Under \$18,209 \$37,650 to \$44,129 \$63,570 or more
 \$18,210 to \$24,689 \$44,130 to \$50,609 Don't know
 \$24,690 to \$31,169 \$50,610 to \$57,089
 \$31,170 to \$37,649 \$57,090 to \$63,569

17. How often do you ride TriMet?

Every day About once a week Once a month
 A few times a week A few times a month Less than once a month

18. Do you normally have access to car at your place of residence? Yes No

19. How many working vehicles do you have access to? 1 2 3 4 or more

20. What is your zip code? _____

21. Are you:

African American/Black Caucasian/White Multi-racial/bi-racial
 Asian/Pacific Islander (non-Hispanic/Latino) Other (please specify) _____
 Alaska Native/American Indian Hispanic/Latino

22. How old are you?

Under 18 35-44 65+
 18-24 45-54
 25-34 55-64

23. What is your gender?

Male Non-binary or Other (please specify) _____
 Female Gender non-conforming

24. If you would like to receive periodic updates on TriMet's Language Access Plan or if you would like to participate in future surveys, please provide your email address below.

Email Address

Thank you for completing this survey.

Appendix B: Bus Operator Intercept Survey Report



TRIMET LIMITED ENGLISH PROFICIENCY RESEARCH

BUS OPERATOR INTERVIEWS

FALL 2016 & FALL 2018

SUMMARY

Background & Methodology

As part of TriMet's effort to evaluate access to transit for all members of the community, intercept surveys were conducted with bus operators. Since bus operators are often the first contact Limited English Proficiency (LEP) passengers have with TriMet, this research was designed to find:

- Learn how operators communicate with LEP passengers
- Solicit their ideas for better ways to communicate with LEP passengers

To this end, TriMet's Marketing Information Department conducted a total of 190 operator interviews at Center Street Garage during the fall 2016 schedule sign-up. Another survey was conducted by TriMet's Transit Equity, Inclusion, and Community Affairs department during the fall 2018 schedule sign-up with 225 operators. Results from 2016 and 2018 are compared below, along with some subgroup analysis. Included in this report are findings from 2005 when the survey was first conducted as well as the second survey in 2011

The interviewing times for each survey periods were spread evenly throughout the two-week sign-up process to ensure operators with varying lengths of service were represented.

Respondent Profiles

- Twenty-five percent of 2018 respondents had been employed with TriMet up to two years, 49% between two and five years, and 26% over five years. Operators from 2016 had less length of service (4.1 average) than those in 2018 (4.6 average).
- Over two-thirds (72%) of 2018 respondents were full-time operators and the rest (28%) were part-time. Full-time operator status resides with those operators working two or more years at TriMet.
- Most (58%) of the 2018 respondents worked at Center Street garage followed by Powell (23%) and then Merlo (19%).

Findings

- Operators were asked which routes they had driven in the past year, where they had most often encountered LEP passengers asking for information and how often.

Operators encountered LEP passengers on about 59% of the bus routes in the system. Routes most often mentioned in both 2016 and 2018 were:

- Line 57- Forest Grove. This route serves Forest Grove, the area with the region's highest concentration of Spanish speakers.¹
- Line 12- Barbur. This is a long route with one end in Sherwood, another area with a large Spanish speaking population.¹
- Line 4-Division, has one end of the route in Gresham, an area with a high concentration of Spanish speakers, as well as Russian, Ukrainian, Tagalog, and Vietnamese.¹
- Line 72-Killingsworth/82nd was a top mention in 2011 and 2016. This route has one end in Gresham, again an area with a high concentration of Spanish speakers, as well as Romanian, Vietnamese and Chinese.¹ The Green Line MAX, which opened in 2010, connects to Line 72.
- Line 6 – Martin Luther King Jr Blvd. This route serves Hayden Island and North Portland, an area with a high concentration of Chinese, Vietnamese speakers, as well as Romanians.
- Line 77 – Broadway/Halsey. On one end, this route serves outer NE Portland, Fairview, Wood Village and Troutdale, which has moderate concentrations of Tagalog, Ukrainian, Russian, and Arabic speaking populations.
- Line 73 – 122nd Ave. This route runs between Parkrose/Sumner Transit Center and SE 94th & Foster, serving a high concentration of Spanish speakers, as well as Ukrainian, Vietnamese, Russian and Chinese.
- Line 76 – Beaverton/Tualatin. This route runs between Tualatin, Tigard, Washington Square and Beaverton, serving a high concentration of Spanish, Tagalog, and Persian speakers.
- Line 99 – Macadam/McLoughlin. On one end, this route serves Oregon City, an area with a high concentration of Ukrainian and Russian speakers.

As for the number of times LEP passengers asked for information, there was a great range depending upon the route. For some routes information requests were only once a week, for others it was as high as 20 times/day.

- Three questions were asked to assess how difficult communicating with LEP passengers was for operators.
 1. The first question asked in general how easy or difficult it was to communicate with LEP passengers. Nearly one-half of the operators interviewed said it was difficult; either *very* (12%) or *somewhat* (33%) difficult.
 - Among the operators who spoke another language, slightly less indicated it was difficult (44%).
 - 2011 operators found it less difficult (59%) than those in 2005 (66%).
 - Among the 2011 operators with up to 1 year length of service, only 45% said it was difficult.

¹ 2012-2016 American Community Survey 5-year Estimates

2. Next a question was asked to find out how difficult communicating with LEP passengers was when *compared to other operator job issues*. In this case responses came in as being less difficult, on average 3.9 on a 10-point scale where 10 was very difficult. This question was not asked in 2016 or 2018.

- 2011 operators found it more difficult than those in 2005, an average of 4.2 and 3.7 respectively.
- Those who spoke another language found it less difficult, an average of 3.6.

3. The third question was open-ended and a different version of the question was asked in 2005 and 2011. This question was not asked in 2016 or 2018.

a. 2005. Operators were asked about the most difficult issues they faced in their job. Only three percent mentioned communicating with LEP passengers as one of the most difficult issues they faced.²

b. 2011. Operators were asked about the most difficult *communication* issues they faced in their job. For this the top mention was language problems in general, 27%.

- Operators were asked what types of questions were most often asked by LEP passengers. In this open-ended question, the top responses were *how to get to a destination* (73%), *which bus to take* (45%) & *fares* (17%). Similar responses were present across all surveys.
- When asked how they communicate with LEP passengers, operators mentioned a variety of strategies including *using hand gestures/sign language* (25%), using English/no other language (25%), *getting them to write down an address* (13%), depends on how well they speak English (9%), non-verbal communication (8%), phrases/key words (6%), listen closely (6%), *ask other passengers* (4%), and *speaking slowly* (2%).
 - There are stark differences compared to 2011 including: *asking other passengers for help* (41%), *using hand gestures/sign language* (29%), *getting them to write down an address* (14%), *pointing to fare signs* (13%), *speaking slowly* (12%), *alerting them to their stop* (12%), *using diagrams or maps* (11%), and *listening closely* (11%).
- Operators were asked if they felt equipped to communicate with passengers who speak limited or no English. Only 37 percent of the 2018 Operators surveyed said yes compared to 56 percent in 2016. The introduction of the “Depends” category in 2018 may have impacted the response selection (i.e., there was no “Depends” category to select in 2016).
- Less than half (38%) of the 2018 operators compared to 50 percent in 2016 were aware of different materials, services or tools TriMet uses to communicate with LEP passengers. This was significantly higher in 2005 and 2011 (92% vs. 74%, respectively).

Unaided Materials/services/tools cited included:

- *Language translation at 238-RIDE* (37%). 2016 had the highest mention (48%). There were lower mentions in 2005 than 2011 (5% vs. 17%, respectively).
- *Channel cards in Spanish* (20%). It was slightly higher in 2016 at 27%. There were lower mentions in 2011 (17%).
- *Website* (16%). It was higher in 2016 at 21%. There were lower mentions in 2005 and 2011 (4% vs. 10%, respectively).
- *Bus/MAX announcements in Spanish* (10%). Lower mentions in 2005, 2011, and 2016 (4%, 11%, and 9%, respectively). During the time between 2005 and 2011 Automatic

² The top six most difficult issues given by 10% or more of the operators were: passengers (38%), traffic (31%), schedules (20%), fare issues (16%), other drivers (12%), and safety/security/danger (10%).

Stop Announcements were installed on all buses which included Spanish language instructions.

- *How to Ride* brochure (8%). It was higher in 2016 at 17%. For 2005 respondents this was a higher mention than in 2011 (34% vs. 10%). Between 2005 and 2011 literature racks on the buses were removed which contained these brochures.

Aided (Read from a list) Materials/services/tools cited included:

- *Bus/MAX announcements in Spanish* (80%).
- *Channel cards in Spanish* (67%).
- *How to Ride* brochure (80%).
- *Website* (27%).
- *Language translation at 238-RIDE* (25%).
- *How to Ride* brochure (22%).
- *Hop multilingual brochure* (19%).

Discontinued Tools

- *Paddle with translations* (49%) for 2011. This was a high visibility item for operators as it stayed on the bus near the driver's seat. It was discontinued before 2005, but 80% of those in 2005 mentioned it.
- *Farebox Spanish* (16%) in 2011. 2005 had higher mentions (22%). This item which gave basic words in Spanish was discontinued after 2005. A shorter one pager developed in 2011 by Operations Training staff was not referenced.
- When asked if TriMet could do something to help operators communicate with LEP passengers, 58% answered Yes, and offered a number of suggestions such as *language classes at TriMet* (32%), *brochures/schedules/maps in other languages* (24%), and *announcements/signage* (6%). In 2018, language classes were offered as part of the E3 Program.
 - In 2011, when asked if TriMet could do something to help operators communicate with LEP passengers, 62% answered Yes, and offered a number of suggestions such as *language classes at TriMet* (36%), *list of phrases with translations* (16%), *translators on the bus or available so operators could phone TriMet* (11%), and *brochures/schedules/maps in other languages* (8%). After 2005, tuition reimbursement from TriMet was discontinued due to budget cuts.
- More than two-thirds (68%) of the operators interviewed mentioned they had not received any training on how to communicate with LEP passengers. This was lower in 2016 (54%).

Of those asked if they would like to receive training, 78% mentioned yes.

- Overall 36% of the operators interviewed speak another language at some level, either fluently or some words. There were 38% in 2016.

Among those who said they spoke another language, most spoke *Spanish or some Spanish* (68%) followed by *German/some German* (8%), and *French/some French* (4%). In 2018, Operators employed with TriMet more than five years had the highest concentration of those who spoke some level of Spanish — 94%. Whereas in 2016, Operators employed with TriMet between one to five years had the highest concentration of those who spoke some level of Spanish — 82%. Compared to 2005 and 2011, Operators employed with TriMet up to one year had the highest concentration of those who spoke some level of Spanish — 89% in 2005 and 86%, respectively.

Conclusions and Recommendations

Operators in this project indicated varying degrees of difficulty communicating with LEP passengers. Factors contributing to their difficulties include the route driven and the proportion of LEP passengers encountered, operator experience, ability to speak at least *a few words* of a foreign language, and awareness and use of TriMet foreign language materials.

Based on the results of this work, it is shown that LEP training, knowledge of TriMet LEP materials and tools, and knowledge of another language, especially Spanish, makes it easier for operators to communicate with LEP passengers. Therefore it is recommended that TriMet take the following steps to assist operators and, ultimately, LEP customers:

1. Offer a dedicated training class on how to communicate with LEP customers and have all front-line employees attend.
2. Offer incentives to increase second language proficiency in TriMet's operator force.
3. Operators are most aware of materials when they are used as part of their daily routine. Farebox Spanish, paddles with translations, How To Ride brochures in racks on vehicles are no longer being used. Work with operators to design new language assistance materials to that will be more practical and useful in their interactions with LEP customer. The reintroduction of paddles with translations should be considered as this was the most frequented tool for operators in 2011.
4. Work with a panel of LEP customers to design new language assistance materials, which will be of most use to them while riding TriMet vehicles.
5. Have more written translated placards/stickers/channel cards in the top 5 LEP language groups.
6. Testing translation phone applications
7. Hire bilingual staff

Appendix C: Bus Operator and Field Operations Survey Findings

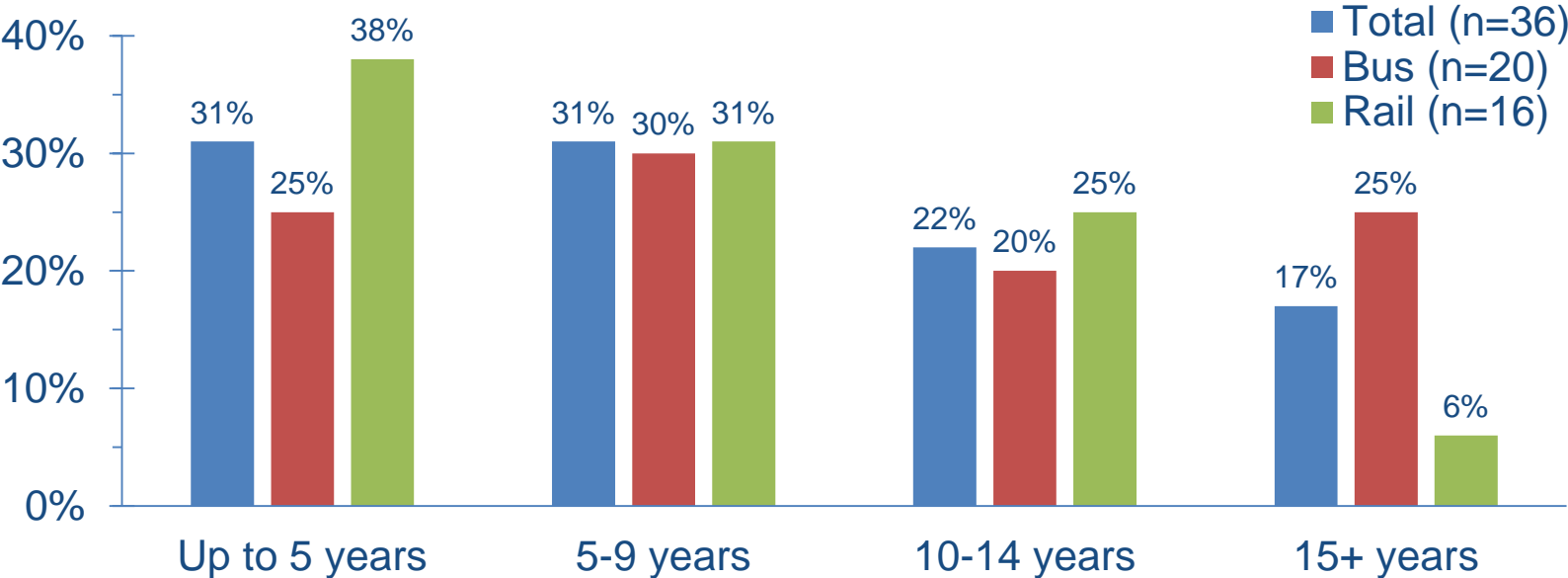
TriMet LEP Research

Bus and Field Operations Intercept Survey Results 2018-2019

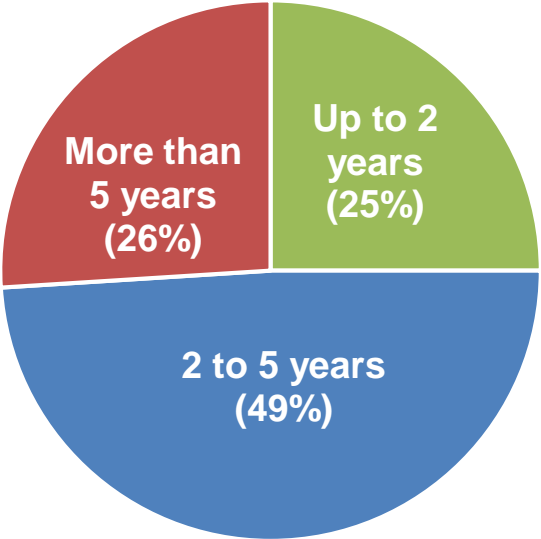
Research and Administration Subcommittee

Respondent Profiles - 2018 Road and Rail Supervisors

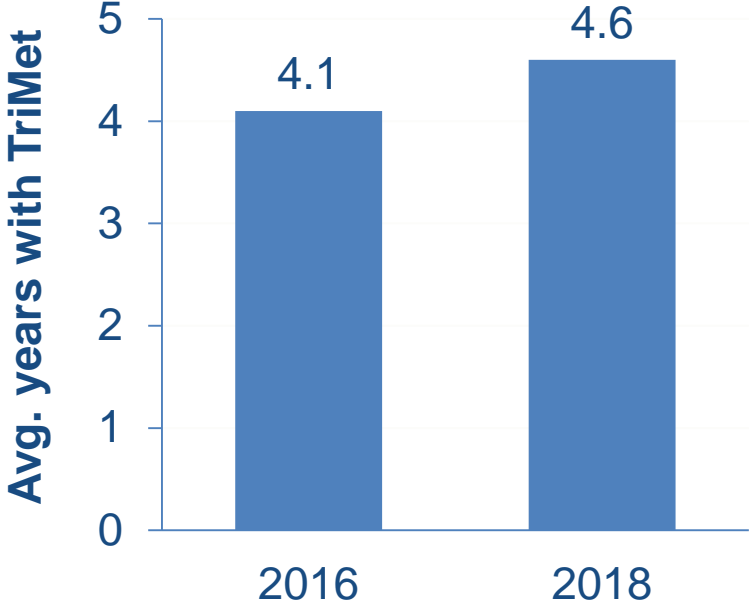
Time with TriMet



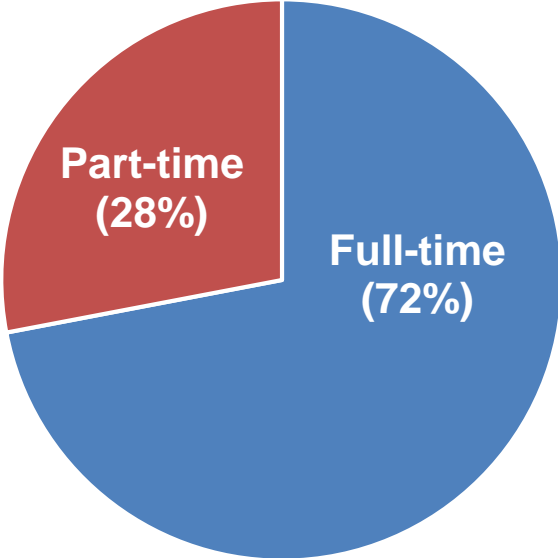
Respondent Profiles – Bus Operators



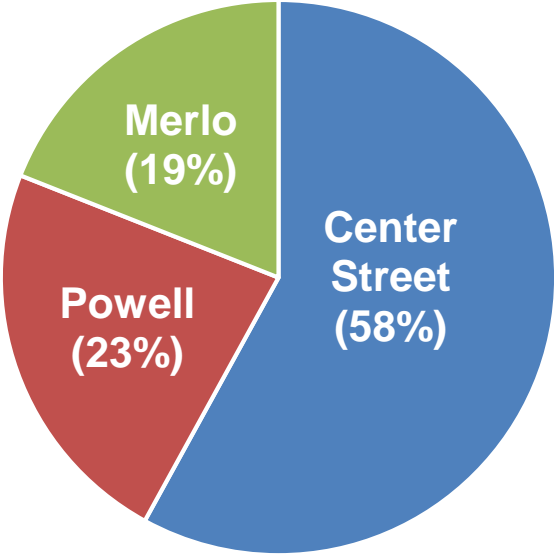
Time with TriMet (2018 survey)



Respondent Profiles - 2018 Bus Operators (n=225)

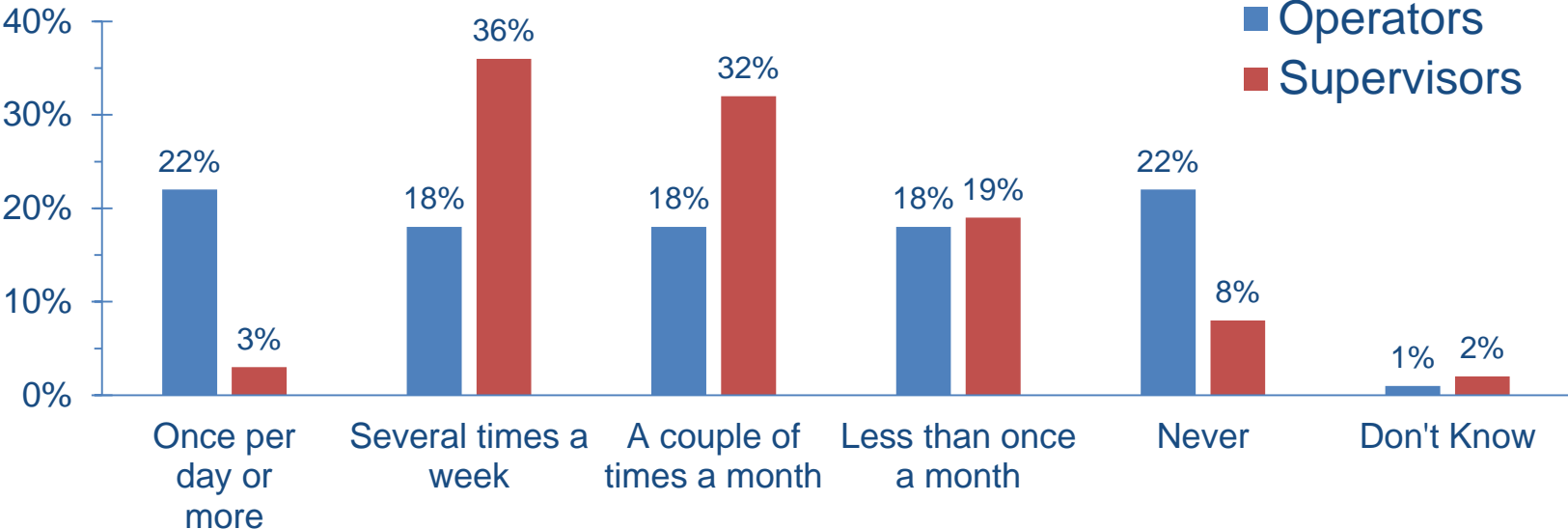


Schedules



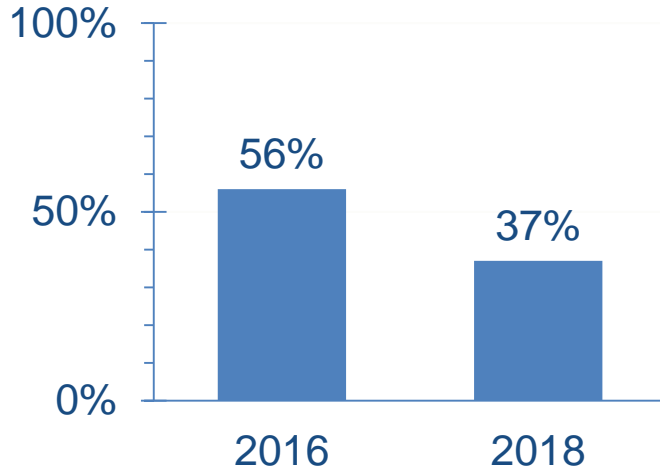
Home Garage

2018 average results: How often do LEP passengers ask you for information?

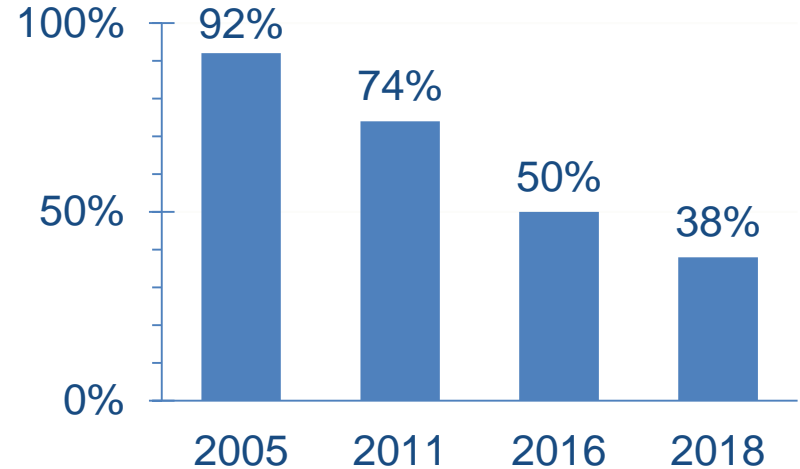


Key Findings - Operators

Felt equipped to communicate with LEP Passengers

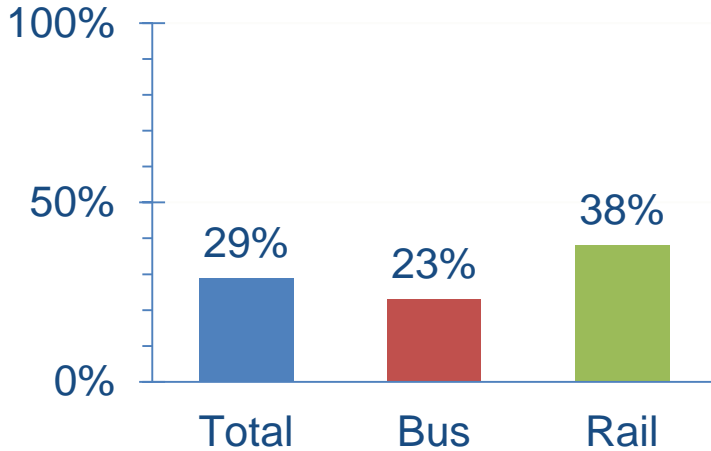


Aware of TriMet's materials, services and tools for communicating with LEP persons

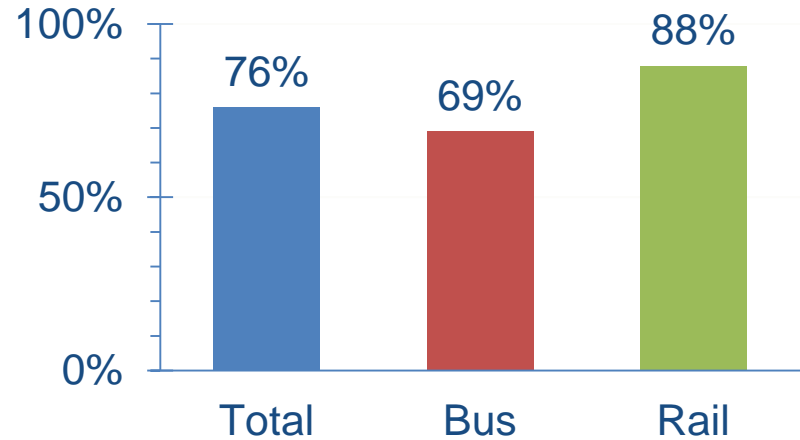


Key Findings – Supervisors (2018)

Felt equipped to communicate with LEP Passengers

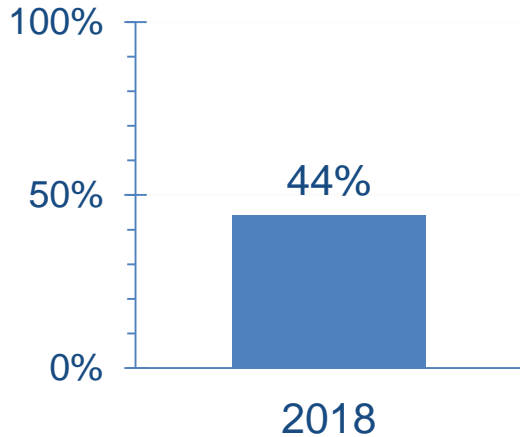


Aware of TriMet's materials, services and tools for communicating with LEP persons

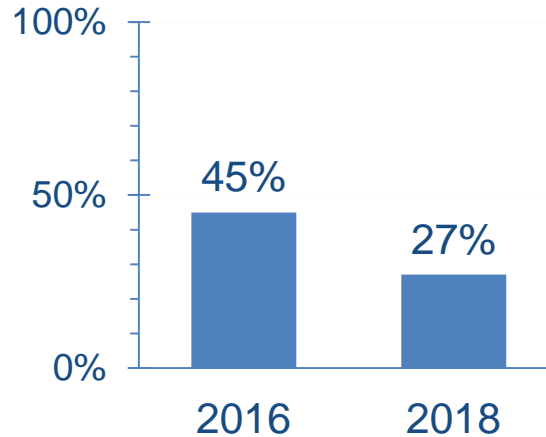


Key Findings – Operators

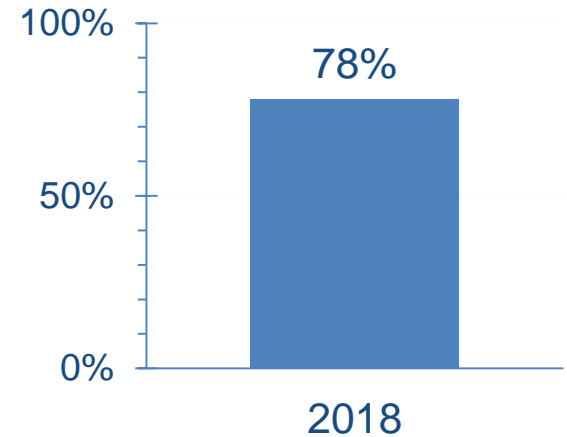
Find it difficult to communicate with LEP passengers



Had received training on how to communicate with LEP passengers

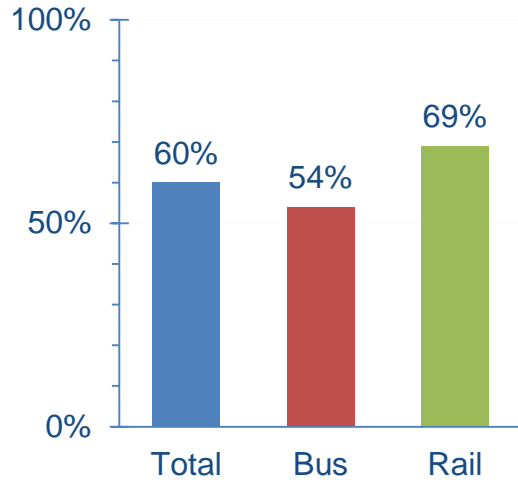


Would like to receive training on communicating with LEP passengers

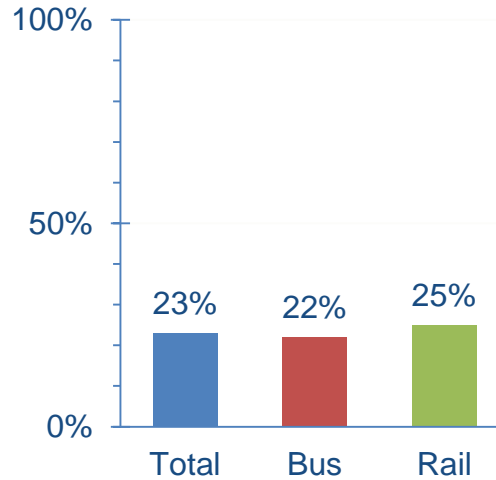


Key Findings – Supervisors (2018)

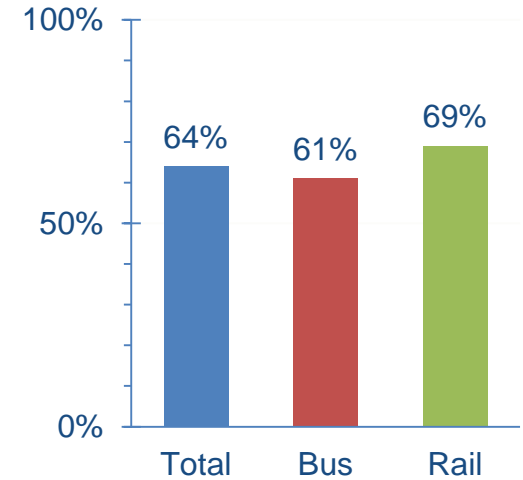
Find it difficult to communicate with LEP passengers



Had received training on how to communicate with LEP passengers



Would like to receive training on communicating with LEP passengers



Appendix D: Bus Operator Survey Instrument

**TriMet
Operator Intercept Survey – LEP
July 2018**

Hello, I am conducting a short survey about your experiences with passengers who speak limited English. We are asking these questions to inform our Title VI reporting. Can I ask you a few questions?

Yes → Thank you. Your answers are confidential and will only be used when combined with the answers of others.

No → Thank, terminate and tally: _____

No → Thank, took survey before

Incomplete → End survey

First I'm going to ask you about the last three routes you have driven in the last year. If you've driven less than three routes, tell me only about the route or routes you have driven. If you drive extra-board, tell me about the routes you have driven most frequently.

1a. What route are you currently driving? (drop down list of bus routes)

1b. On that route, about how often do you have passengers who speak limited or no English who asked you for information? Would you say....

1. Once per day or more
2. Several times a week
3. A couple of times a month
4. Less than once a month
5. Never
6. Don't know (*don't read*)

1c. Did you drive another route in the last year?

1. Yes (continue)
2. No (skip to Q4)

2a. What is that route? (drop down list of bus routes)

2b. On that route, about how often did you have passengers who speak limited or no English who asked you for information?

1. Once per day or more
2. Several times a week
3. A couple of times a month
4. Less than once a month
5. Never
6. Don't know (*don't read*)

2c. Did you drive another route in the last year?

1. Yes (continue)
2. No (skip to Q4)

3a. What is that route? (drop down list of bus routes)

3b. On that route, about how often did you have passengers who speak limited or no English who asked you for information?

1. Once per day or more
2. Several times a week
3. A couple of times a month
4. Less than once a month
5. Never
6. Don't know (*don't read*)

4. What types of questions do you get asked the most from limited-English-speaking passengers? (Do not read list, check all that apply)

1. Fares
2. How to get to their destination/building
3. Which bus to take/which bus stop
4. Other (specify) _____
5. Don't get asked

5. Are you aware of any materials, services, or tools that TriMet uses to communicate with limited-English-speaking passengers?

1. Yes (continue to Q6a)
2. No (skip to Q6b)
3. Don't know (skip to Q6b)

6a. What are those materials, services or tools? (Do not read list, check all that apply) - Unaided

1. How to Ride brochure
2. Hop multilingual brochure
3. Language interpretation at 238-RIDE
4. Website
5. Bus/MAX announcements in Spanish
6. Channel cards in Spanish (overhead signs onboard bus/MAX)
7. Other (specify) _____

6b. Are you aware of... (Read list for those not mentioned) - Aided

1. How to Ride brochure
2. Hop multilingual brochure
3. Language interpretation at 238-RIDE
4. Website
5. Bus/MAX announcements in Spanish
6. Channel cards in Spanish (overhead signs onboard bus/MAX)

7. In general, how difficult or easy is it for you to communicate with limited English speaking passengers? Would you say:

1. Very difficult
2. Somewhat difficult
3. Somewhat easy
4. Very easy
5. I don't communicate (don't read)

8a. Do you feel equipped to communicate with passengers who speak limited or no English?

1. Yes (continue to Q8b)
2. Depends (continue to Q8b)
3. No
4. Don't know

8b. In what language or languages do you feel equipped to communicate with passengers who speak limited or no English and how? _____

9. Is there something TriMet can do to help you communicate with limited-English-speaking passengers?

1. Yes (continue)
2. No (skip to Q11a)
3. Don't know (skip to Q11a)

10a. What can TriMet do to better prepare you to assist passengers who speak limited or no English? _____

10b. Do you have any suggestions on how TriMet can better assist passengers who speak limited or no English?

1. Yes (specify)

2. No (skip to Q11a)
3. Don't know (skip to Q11a)

11a. Have you had any training on how to communicate with limited-English-speaking passengers?

1. Yes (continue to Q11b)
2. No (continue to Q11c)
3. Don't know (continue to Q11c)

11b. What was the training and who delivered the training or course?

11c. Would you like to receive training?

1. Yes
2. No
3. Don't know

12. When you need to communicate with limited English speaking passengers, how do you it?

(Do not read list; check all that apply)

1. Alert them to their stop
2. Use diagrams or maps
3. Point to fare signage
4. How to Ride brochure
5. Ask other passengers for help
6. Farebox Spanish
7. I don't communicate (explain:_____)
8. Other (specify:___)

13. There is a Federal Transit Administration guideline that states transit agencies shall work to improve access to services for persons with limited English proficiency. Before today, were you aware of that?

1. Yes
2. No
3. Don't know

Now I'd like to ask a few questions about you. No identifying information will be asked such as your name or badge number.

14. How many other languages do you speak besides English? (Enter a number; if the number is 0, then questions 15a and 15b will be skipped; otherwise questions 15a and 15b will be repeated based on the number of other languages spoken)

15a. What is that language? (Do not read list, select one)

1. Spanish
2. Russian
3. Vietnamese
4. Chinese
5. Korean
6. Romanian
7. Japanese
8. Tagalog
9. Mon-Khmer/Cambodian
10. Somali
11. Arabic
12. Ukrainian
13. Persian
14. Other (specify): _____

(If speak more than one language, ask for both...)

15b. About how often do you use (restore from Q15a) in your job at TriMet?

1. Once per day or more
2. Several times a week
3. A couple of times a month
4. Less than once a month
5. Never
6. Don't know (*don't read*)

16. How long have you been driving for TriMet? (drop down list of years – up to 40)

17. Do you drive full-time or part-time?

1. Full-time
2. Part-time

18. Do you currently drive extra-board?

1. No
2. Yes

19. What garage do you currently drive from?

1. Center
2. Merlo
3. Powell

Those are all the questions I have. Thank you for taking part in this survey.

Space for comments (*if needed*) _____

Tablet records: Surveyor tablet #, time of day, day of week

Appendix E: Road and Rail Supervisor Survey Instrument



Road and Rail Supervisors Limited English Proficient Passenger Survey

Introduction

As part of TriMet's effort to evaluate access to transit for all members of the community, the Limited English Proficiency (LEP) workgroup would like to conduct intercept surveys with Road and Rail Supervisors, on a volunteer basis, in the next few weeks. Since Road/Rail Supervisors may come in contact with LEP passengers, this research is designed to find:

- **How Road and Rail Supervisors communicate with LEP passengers**
- **Solicit your ideas for better ways to communicate with LEP passengers**

All the responses you give are completely confidential. This survey doesn't track who you are or your email address.

Please respond by November 27.

* 1. First, are you a bus or rail supervisor?

Bus

Rail



Road and Rail Supervisors
Limited English Proficient Passenger Survey

Everyone ---- these questions are combined bus/rail to simplify.

In the next pages you will be asked about up to three districts where you have worked in the last year.

* 2. What is the main district you currently work in?

* 3. In that district, about how often do you have passengers who speak limited or no English who asked you for information?

- Once per day or more
- Several times a week
- A couple of times a month
- Less than once a month
- Never
- Don't know



Road and Rail Supervisors
Limited English Proficient Passenger Survey

Second district

* 4. Did you work in another district in the last year?

Yes

No



Road and Rail Supervisors
Limited English Proficient Passenger Survey

Second district

* 5. What is the next district where you worked the most often in the last year?

* 6. In that district, about how often do you have passengers who speak limited or no English who asked you for information?

- Once per day or more
- Several times a week
- A couple of times a month
- Less than once a month
- Never
- Don't know



Road and Rail Supervisors
Limited English Proficient Passenger Survey

Third district

* 7. Did you work in another district in the last year?

Yes

No



Road and Rail Supervisors
Limited English Proficient Passenger Survey

Third district

* 8. What is the next district where you worked the most often in the last year?

* 9. In that district, about how often do you have passengers who speak limited or no English who asked you for information?

- Once per day or more
- Several times a week
- A couple of times a month
- Less than once a month
- Never
- Don't know



Road and Rail Supervisors
Limited English Proficient Passenger Survey

10. What types of questions do you get asked the most from limited-English-speaking passengers?(Check all that apply.)

- Fares
- How to get to their destination/building
- Which bus to take/which bus stop
- Don't get asked
- Other (please specify)

* 11. Are you aware of any materials, services, or tools that TriMet uses to communicate with limited-English-speaking passengers?

- Yes
- No
- Don't know

12. If yes, what are those materials, services or tools?



Road and Rail Supervisors
Limited English Proficient Passenger Survey

13. Below are ways that TriMet communicates with limited-English-speaking passengers. Check all that you are aware of.

- Fares and How to Ride brochure
- TeleLanguage Card
- TriMet Respects Civil Rights brochure
- Hop multilingual brochure
- Language translation at 238-RIDE
- Website

* 14. In general, how difficult or easy is it for you to communicate with limited English speaking passengers?

- Very difficult
- Somewhat difficult
- Somewhat easy
- Very easy
- I don't communicate

* 15. Do you personally feel equipped to communicate with passengers who speak limited or no English?

- Yes
- Depends on the language
- No
- Don't know

* 16. Is there something TriMet can do to help you communicate with limited-English-speaking passengers?

- Yes
- No
- Don't know



Road and Rail Supervisors
Limited English Proficient Passenger Survey

17. What can TriMet do to better prepare you to assist passengers who speak limited or no English?

* 18. Do you have any suggestions on how TriMet can better assist passengers who speak limited or no English?

- Yes
- No
- Don't know

19. *If yes*, what suggestions do you have?



Road and Rail Supervisors
Limited English Proficient Passenger Survey

* 20. Have you had any training on how to communicate with limited-English-speaking passengers?

- Yes
- No
- Don't know

21. If yes, what was the training and who delivered the training or course?

* 22. Would you like to receive training?

- Yes
- No
- Don't know

23. When you need to communicate with limited English speaking passengers, how do you it?(Check all that apply.)

- Use diagrams or maps
- Point to fare signage
- How to Ride brochure
- TeleLanguage Card
- Ask other people for help
- I don't communicate
- Other (please specify)



Road and Rail Supervisors
Limited English Proficient Passenger Survey

About you

Now we'd like to ask a few questions about you. No identifying information will be asked such as your name or badge number.

24. How many other languages do you speak besides English?

25. If you speak another language, what language (s)? (Check all that apply.)

- | | | |
|---|--|------------------------------------|
| <input type="checkbox"/> Spanish | <input type="checkbox"/> Romanian | <input type="checkbox"/> Arabic |
| <input type="checkbox"/> Russian | <input type="checkbox"/> Japanese | <input type="checkbox"/> Ukrainian |
| <input type="checkbox"/> Vietnamese | <input type="checkbox"/> Tagalog | <input type="checkbox"/> Persian |
| <input type="checkbox"/> Chinese | <input type="checkbox"/> Mon-Khmer/Cambodian | |
| <input type="checkbox"/> Korean | <input type="checkbox"/> Somali | |
| <input type="checkbox"/> Other (please specify) | | |

26. If you speak another language, about how often do you use that language in your job at TriMet?
Answer for the other language that you speak most often in the job.

- Once per day or more
- Several times a week
- A couple of times a month
- Less than once a month
- Never
- Don't know

27. How long have you been a supervisor for TriMet?

- Up to 5 years
- 5 - 9 years
- 10 - 14 years
- 15 years or more

28. Do you currently work an auxillary shift?

- Yes
- No

29. Do you currently, or have you ever, worked a code enforcement shift?

- Yes
- No



Road and Rail Supervisors
Limited English Proficient Passenger Survey

Thank you!

Those are all the questions. Thank you for taking this survey.

30. Comments?

Attachment G

Subrecipient's Title VI Compliance Template

Subrecipient's Title VI Compliance Template

Covering Activities in TriMet's FY2020 (July 1, 2019 - June 30, 2020)

Subrecipient(s):

Updated by:	
Date updated:	

Intergovernmental Agreement Background:

FY2020

The following general requirements are applicable to public transportation provider that operates demand response service, must submit to TriMet:

Component	Criteria pursuant to FTA Circular 4702.1B (eff. 10/01/12)	Applicable - Yes / No	Due Date	Date of submission	Notes/Comments
Title VI Assurances	Chapter III - Section 2	No	N/A	N/A	
Title VI Program - which includes:	Chapter III				
Public Notice	Chapter III - Sections 4(a)(1)	Yes	August 15th every year		
	Chapter III - Sections 5				
	Appendix B				
Complaint Procedures	Chapter III - Sections 4(a)(2)	Yes	August 15th every year		
	Chapter III - Sections 6				
	Appendix C				
Complaint Form	Chapter III - Sections 4(a)(2)	Yes	August 15th every year		
	Chapter III - Sections 6				
	Appendix D				
List of Transit Related Title VI Complaints, Investigations, and Lawsuits	Chapter III - Sections 4(a)(3)	Yes	August 15th every year		
	Chapter III - Sections 7				
	Appendix E				

Public Participation Plan	Chapter III - Sections 4(a)(4)	Yes	August 15th every year		
	Chapter III - Sections 8				
Language Assistance Plan	Chapter III - Sections 4(a)(5)	Yes	August 15th every year		
	Chapter III - Sections 9				
Minority Representation Table	Chapter III - Sections 4(a)(6)	Yes	August 15th every year		
	Chapter III - Sections 10				
	Appendix F				
Providing Assistance and Monitoring of Subrecipient Compliance	Chapter III - Sections 4(a)(7)	No	August 15th every year		
	Chapter III - Sections 11 & 12				
	Appendix L				
Facility Location Equity Analysis	Chapter III - Sections 4(a)(8)	No	August 15th every year		
	Chapter III - Sections 13				

<i>The following additional requirements (along with general requirements) are applicable to any fixed route transportation provider:</i>					
Component	Criteria pursuant to FTA Circular 4702.1B (eff. 10/01/12)	Applicable - Yes / No	Due Date	Any changes or date of new submission?	Notes/Comments
System-wide Service Standards which includes:	Chapter IV				
Vehicle load for each mode	Chapter IV - Section 4(a)(1) Appendix G-1	Yes	April 30th every 3rd year	August 15th every year	

Vehicle headway for each mode	Chapter IV - Section 4(a)(2) Appendix G-2	Yes	April 30th every 3rd year	August 15th every year	
On time performance for each mode	Chapter IV - Section 4(a)(3) Appendix G-3	Yes	April 30th every 3rd year	August 15th every year	
Service availability for each mode	Chapter IV - Section 4(a)(4) Appendix G-3	Yes	April 30th every 3rd year	August 15th every year	
System-wide Service Policies which includes:	Chapter IV				
Transit Amenities for each mode	Chapter IV - Section 4(b)(1) Appendix H	Yes	April 30th every 3rd year	August 15th every year	
Vehicle Assignment for each mode	Chapter IV - Section 4(b)(2) Appendix H	Yes	April 30th every 3rd year	August 15th every year	

The following additional requirements (along with general and additional requirements noted above) are applicable to providers of transit service that operate 50 or more fixed route vehicles in peak services and are located in Urbanized Area (UZA) of 200,000 or more people must also submit to TriMet:

Component	Criteria pursuant to FTA Circular 4702.1B (eff. 10/01/12)	Applicable - Yes / No	Due Date	Any changes or date of new submission?	Notes/Comments
Collect & Report Data which includes:	Chapter IV				
Demographic and service profile maps and charts	Chapter IV - Section 5(a) Appendix I	No	August 15th every year	N/A	
Demographic ridership and travel patterns, collected by surveys	Chapter IV - Section 5(b)	No	August 15th every year	N/A	
Monitor transit service	Chapter IV - Section 6 Appendix J	No	August 15th every year	N/A	
Evaluate service & fare equity changes	Chapter IV - Section 7 Appendix K	No	August 15th every year	N/A	

Attachment H

4th Bus Operations and Maintenance Base Equity Analysis



Equity Analysis: 4th Bus Operations and Maintenance Base

Department of Diversity & Transit Equity

August 6, 2018

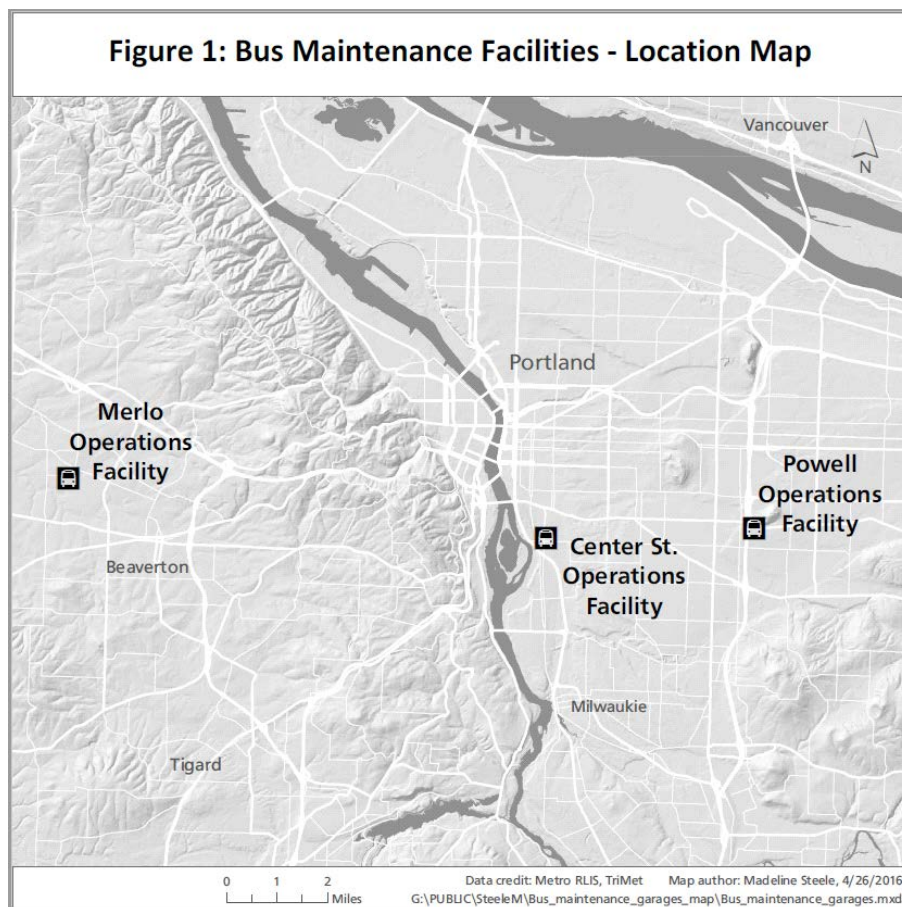


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I. Background

The Tri-County Metropolitan Transportation District of Oregon (TriMet) was chartered by the Oregon legislature, as a municipal corporation to provide public transportation in a 570 square-mile service area district covering most of Multnomah, Washington and Clackamas counties, comprising the greater Portland, Oregon metropolitan region. When TriMet began operation on Dec. 1, 1969, there was 175 buses operating over 36 routes¹. Forty-nine years later, TriMet now operates 664 transit buses on 80 fixed-route lines, with 558 buses in service during peak weekday service². TriMet's fixed route fleet operates out of three geographically distinct locations. Figure 1, Bus Maintenance Facilities - Location Map, shows the location of TriMet's bus facilities within the service district area.



TriMet has conducted a number of bus facilities development studies over the years, to prepare for future service requirements and fleet growth, including in 1998, 2000, 2004, and 2007. The conclusions of prior studies, updated with current (2017) information³, include:

¹ Making History: 45 Years of TriMet and Transit in the Portland Region

² TriMet Fall 2017 Bus Distribution Report

³ 2016 TriMet Bus Fleet Management Plan

Center Street

- The primary capacity constraint at the current Center Street facility is its yard (including the fuel/wash facility), not its garage. While the garage needs interior remodeling to modernize workflow, the overall number of bus bays can accommodate on the order of 100 more buses, assuming maximum staffing and production over all shifts and days.
- Employee parking at Center Street is not fully accommodated on-site and relies on on-street parking in the adjacent neighborhood for a portion of peak parking needs.

Powell

The capacity constraints at the current Powell facility are:

- The current maintenance shop was originally sized and designed only for preventative maintenance and running repairs, not the full range of bus maintenance including major repairs and overhauls, retrofits/campaigns, etc., and is very under-sized for the number of buses domiciled at Powell.
- Capacity of the current bus yard was reduced by locating the eastside operating base for TriMet's LIFT paratransit operations there, in 2002. At the time, this was intended to be "temporary" but for various reasons would remain in operation at the Powell garage location for 15 years. The construction of a new LIFT facility began in late 2017 and was completed fall of 2018. The facility is located at the Powell Park & Ride directly across the freeway from the current facility.
- Off-site employee parking is not practical surrounding the Powell facility. During weekday peak periods, employee parking is currently full. A small amount of overflow parking has been arranged at a nearby church lot, but future expansion of the number of buses at Powell requires an increase in on-site employee parking.

Merlo

- While the current Merlo facility has both shop and yard capacity to increase the number of buses, Merlo is geographically distant from the core of TriMet's service area. Redirecting current bus routes to the Merlo facility would substantially increase deadheading cost and create less service efficiency.
- During weekday peak periods, employee parking is currently full at the Merlo facility. Off-site employee parking is not practical surrounding the Merlo facility. Increasing the number of buses at Merlo requires an increase in on-site employee parking. Off-site employee parking is not practical.

Generally speaking, TriMet's earlier bus facilities development studies were "put on the shelf", due to economic downturns. While the overall long-term trend for the Portland metropolitan area is for substantial increases in population due to in-migration on top of natural growth, much of the 2000s was a "flat" time, beginning with the dot-com recession, followed by 9-11, and ending with the Great Recession. In the 2010s however, the region has resumed its long-term growth trend. In 2015, TriMet enacted a 2016 - 2025 period of annual increments of its transit district payroll tax, to fulfill transit service needs projected over this period by the Regional Transportation Plan and associated TriMet Service Enhancement Plans.

II. Project Description

Due to future service expansions, a projected growth of the fixed-route and light rail vehicles as well as existing facilities nearing yard capacity, TriMet is in need of both a temporary, near-term solution starting in 2019 and a long-term, permanent solution by 2024. A TriMet internal steering committee, made up of key agency stakeholders, were tasked with identifying a 4th conventional bus operations and maintenance base to meet these imminent demands. This required the selection of a site in early 2018.

To provide context for the need, Table 1 shows the maximum yard capacity, number of garage bays, number of buses domiciled, and additional yard capacity, for each facility. The Center Street and Powell facilities are currently used at nearly their current yard capacities, while the Merlo facility is currently used at about 61% of its yard capacity. The reason for this difference is domiciling as many buses as closely as possible to the routes that they serve, i.e., to minimize "deadheading" of buses (travelling out of service) to pull-out and pull-in to their assigned routes, for optimal service efficiency in terms of the ratio of bus revenue service hours to bus vehicle hours (operator pay hours).

	Garage Bays	Maximum Yard Capacity	December 2017 (40' & 30' buses)	Additional Yard Capacity (40' buses)
Center Street	42 (32 repair, 10 steam, tire & other)	290	281	9
Powell	15 (13 repair, 1 steam, & 1 tire)	240	236	4
Merlo	26 (17 repair & 9 body shop)	270	147 + 18 contingency	105
Total...	83	800	682	118

By fiscal year 2023, the bus fleet is projected to grow by 21 percent. These additional 135 buses will bring the total number of buses to 817, which will exceed the current bus yard capacity for all three garages combined. Table 2 below denotes the yard capacity as well as the growth of the yard after the Powell construction. As noted, the Powell expansion will help with the yard capacity constraints in the later years; however, TriMet will need a temporary space to domicile 60-80 buses during the Powell construction. Moreover, it becomes a strategic imperative to secure a more long-term solution as the agency looks ahead to the year 2024 and beyond.

Table 2: Bus Maintenance Facilities Yard Capacity and Growth			
	Maximum	During Powell Construction	After Powell Construction Complete in 2024
Center Street	290	290	290
Powell	240	180	328 (includes 60' articulated buses)
Merlo	270	270	270
Total...	800	710	858

III. Title VI Compliance

TriMet has determined that the selection of a 4th bus operations and maintenance base falls under the provisions in Chapter III-13 of FTA Circular 4702.1B:

13. DETERMINATION OF SITE OR LOCATION OF FACILITIES. Title 49 CFR Section 21.9(b)(3) states, “In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part.” Title 49 CFR part 21, Appendix C, Section (3)(iv) provides, “The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin.” For purposes of this requirement, “facilities” does not include bus shelters, as these are transit amenities and are covered in Chapter IV, nor does it include transit stations, power substations, etc., as those are evaluated during project development and the NEPA process. Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc.

Therefore, TriMet is required to conduct a Title VI equity analysis to ensure the location is selected without regard to race, color, or national origin. Per the guidance in the FTA Circular, this analysis must:

- Include outreach to persons potentially impacted by the siting of the facility;
- Compare impacts of various siting alternatives;
- Determine if cumulative adverse impacts might result due to the presence of other facilities with similar impacts in the area; and
- Occur before the selection of the preferred site.

If any disparate impacts or disproportionate burdens are identified through the analysis, the least discriminatory alternative must be implemented.

IV. Site Selection Process

The selection of a 4th bus operations and maintenance base facility location must meet several important criteria, including acquisition and operating costs, availability, appropriate zoning, adequate size (12+ acres), geographic proximity to the service area, and access to major thoroughfares, including the I-5 freeway. TriMet's Geographic Information Systems department studied potential geographic locations by performing a deadhead analysis, which was an integral site selection criteria. This analysis sought to minimize the amount of system-wide non-revenue (deadhead) operating time, i.e., the travel to/from the bus garage to the route start/end. The total system-wide deadhead travel time was calculated for each candidate site to determine what reduction the new site would yield, if any.

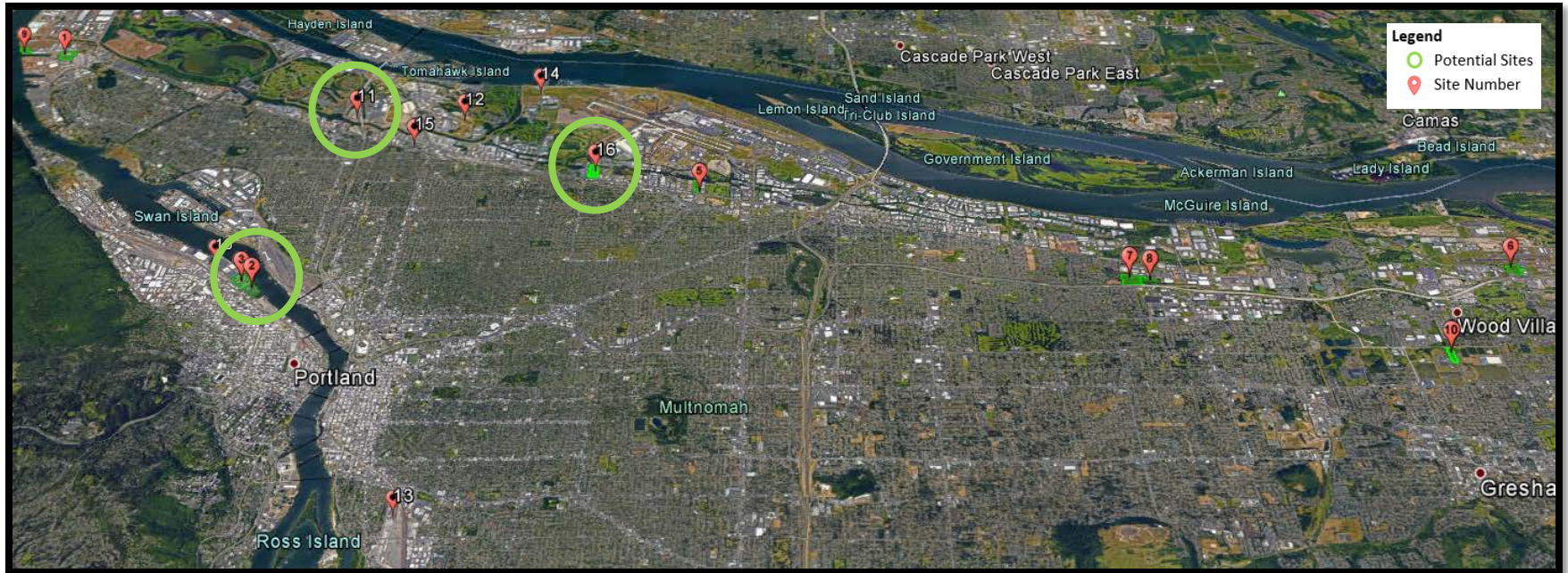
The model assumed that TriMet's bus service from the fall schedule (the week of October 1 – 7, 2017, a week with no holidays or service disruptions) would be representative of future bus service. The travel time to/from the route start/end was calculated based on the roadway speed limit (obtained from OpenStreetMap). Travel times were adjusted based on the time of day (25% longer during peak times and 10% during the midday). The modeled scenario can be thought of as a best-case scenario of the system-wide deadhead time if the 4th bus yard was located in that particular site. In addition to the sites available for sale, the analysis also evaluated all sites with the proper zoning (EG1, EG2, EX, IG1, IG2 or HI) and a lot size of at least 10 acres. Refer to Table 3 below for analysis ranking, size, and zoning results.

TriMet's Real Property group conducted the site search. Staff searched property listings for sites currently for sale, used computer search programs to find sites in the necessary geographic area that would meet the criteria and also visited several sites to determine their potential for this use. The search was extensive, and TriMet is confident it analyzed all locations that could meet the required criteria for the 4th base site. Other considerations were access to major thoroughfares (i.e., allowing for higher speed limits and reducing travel times) as well as potential impediments like railroads, or stoplights.

This process led to staff identifying seventeen sites (Figure 2) as potential locations for the Steering Committee to consider. After comparing these sites to the required selection criteria, TriMet selected 2400 NW Front Avenue (Site 2 on Fig. 2), 2700 NW Front Avenue (Site 3 on Fig. 2), 1501 North Schmeer Road (Site 11 on Fig. 2) and 4421 NE Columbia Boulevard (Site 16 on Fig. 2) for further analysis. All four sites fell into the *acceptable* location category and were formally endorsed by the Steering Committee in December 2017. Going forward this document will refer to these sites as:

Site Number and Address	Zoning	Size	Deadhead Ranking
Site 1: 1501 N Schmeer Road	Heavy Industrial	24 Acres	96.67%
Site 2: 2700 NW Front Avenue	Heavy Industrial	14.9 Acres	98.49%
Site 3: 2400 NW Front Avenue	Heavy Industrial	15.8 Acres	95.04%
Site 4: 4421 NE Columbia Blvd	General Industrial II	30 Acres	94.11%

Figure 2: Potential 4th Operations and Maintenance Base Sites



V. Site Alternatives Equity Analysis

While the siting criteria was exclusively used to narrow the candidates down to four sites, TriMet analyzed area demographics to assess any potential disparate impacts based on race, color, or national origin. As shown in Table 4, Site 1 is located in a block group that is 40% minority, which is above TriMet’s minority district average of 28%⁴. Site 2 and Site 3 are in block groups that are slightly less populated than Site 1 and has the lowest concentration of minority population at 16%. The block group surrounding Site 4 has the smallest population, but the highest concentration of minorities at 48%.

Table 4: Equity Impact Comparison for Potential Sites

	Site 1 (North Schmeer)	Site 2 (2700 Front Ave)	Site 3 (2400 Front Ave)	Site 4 (NE Columbia Blvd)
Minority Population of surrounding Census Block Group <i>District avg: 28%</i>	Total Pop: 4,193 40% Minority Pop.	Total Pop: 3,246 16% Minority Pop.		Total Pop: 2,067 48% Minority Pop.
Who would be impacted by selecting this site?	35 commercial properties are within a ¼ mile from site	309 properties (136 residential and 173 commercial or industrial) are within a ¼ mile from both sites		349 properties (258 residential and 91 commercial) are within a ¼ mile from site
Will selecting this site require displacement of residents or businesses?	Yes (Moderate Impact)	Yes (High Impact)	No (Low Impact)	No (Low Impact)
List other similar facilities nearby. Includes storage, maintenance, operations, etc.	<ul style="list-style-type: none"> - Portland International Raceway - Wilkins Trucking - Interstate Rentals - SafeGard Storage - Trillum Lumber - Harrah’s Truck Detail Company - Bob’s Metals Company - S & H Landscape Supplies and Recycling Comp - Solum Industries 	<ul style="list-style-type: none"> - BNSF Railway Company - Gunderson (GBX) Railcar Manufacturer - Shaver Marine Transportation Company - Vehrs Distributing Wine Wholesaler - Sulzer Pumping Solutions Company - Ager Tank & Equipment Company - Lakeside Industries Asphalt Paving & Construction Company - Georgia-Pacific Company 		<ul style="list-style-type: none"> - Peterson Caterpillar Equipment Maintenance Site - Apollo Chemical & Equipment Company - Portland Disposal & Recycling Site - Betts Truck Parts & Service - CESSCO Inc. - WW Trailers Inc. - Ferguson Plumbing Site

⁴ Source for all demographic information is the 2011-2015 American Community Survey

Three additional factors were compared for evaluating the relative equity impacts: 1) who would be impacted by each respective site selection; 2) whether either would require displacement of residents or businesses; and 3) any cumulative impacts from the presence of similar facilities in the area.

Based on the FTA's site alternatives equity analysis, the 4th base is expected to have minimal community impacts, whichever site is selected. A primary factor for this determination is all four sites would be located in areas that have local land use regulations. The regulations separate incompatible uses and apply objective standards to minimize or avoid any potential off-site impacts. As described in Table 4, Site 1 has commercial properties within a ¼ of a mile from the site. Whereas, Sites 2 through 4 has a mix of both commercial and residential properties. The impact would be minimal because all residential properties have multiple buffers of roadways and other rights-of-way, as well as elevation changes between them and each site. Moreover, all nearby commercial properties are located in similar zoning spaces.

To elaborate, Sites 1-3 are zoned as Heavy Industrial (HI) and Site 4 is zoned as General Industrial 1 (IG1). Both zones allow the proposed use (i.e., bus Operations and Maintenance base) to be established as a permitted use, subject to the "off-site impacts" regulations which provide objective regulations for noise, vibration, odor, and glare on the nearest residential, commercial and open space zones. The zoning designations were established to protect public health, safety, comfort, convenience and the general welfare and to protect the economic base of the City as well as the value of real estate, by regulating industrial development in each location. The HI zone provides areas where various industries may locate including those not desirable in other zones due to their objectionable impacts or appearance. The HI zoning district provides appropriate locations for intensive industrial uses including industrial service, manufacturing and production, research and development, warehousing and freight movement, railroad yards, waste-related and wholesale sales activities. Activities in the HI zone include those that involve the use of raw materials, require significant outdoor storage and generate heavy truck and/or rail traffic. Whereas, the IG1 zone provides areas where most industrial uses may locate, while other uses are restricted to prevent potential conflicts and to preserve land for industry. Because of these characteristics, HI and IG1-zoned property are carefully located to minimize impacts on established residential, commercial and light industrial areas. Thus, each site would present minimal impacts at each respective community.

Sites 1 and 2 would require displacement of existing tenants and/or business. From a Title VI standpoint, the selection of Site 1 would present a moderate impact and the selection of Site 2 would present an even higher impact. Sites 3 and 4 would not require displacement of commercial or residential properties. Thus, no impacts would be presented for these sites.

In terms of cumulative impacts, Site 1 is temporarily being utilized as a parking lot storage for an auto auction company. Site 1 is next to the Portland International Raceway and Delta Park/Vanport MAX Station to the west, the Columbia Slough to the south, and a retail plaza to the east. While this area has high minority populations (40 percent) for the TriMet District, the impacts of the site itself are expected to be moderate given the proximity to residential properties, the intended use of the site, and the displacement of a business. Given these considerations, the selection of Site 1 does present a potential disparate impact.

Site 2 has a facility occupied by a light fixture company with no immediate move or relocation strategy. Additionally, Site 2 abuts an industrial engineering and manufacturing firm, as well as several textile, carpet, construction, wine distribution and lumber companies.

Site 3 is currently vacant with retail stores, a banking institution, an electric and supply company, and the Pacifica Tower Condos in close proximity to this lot. Both sites are within an area that has low minority populations (16 percent). Given these considerations, the selection of Site 3 does not present any disparate impacts. However, there are potential high impacts for selecting Site 2 given the displacement of the current occupant.

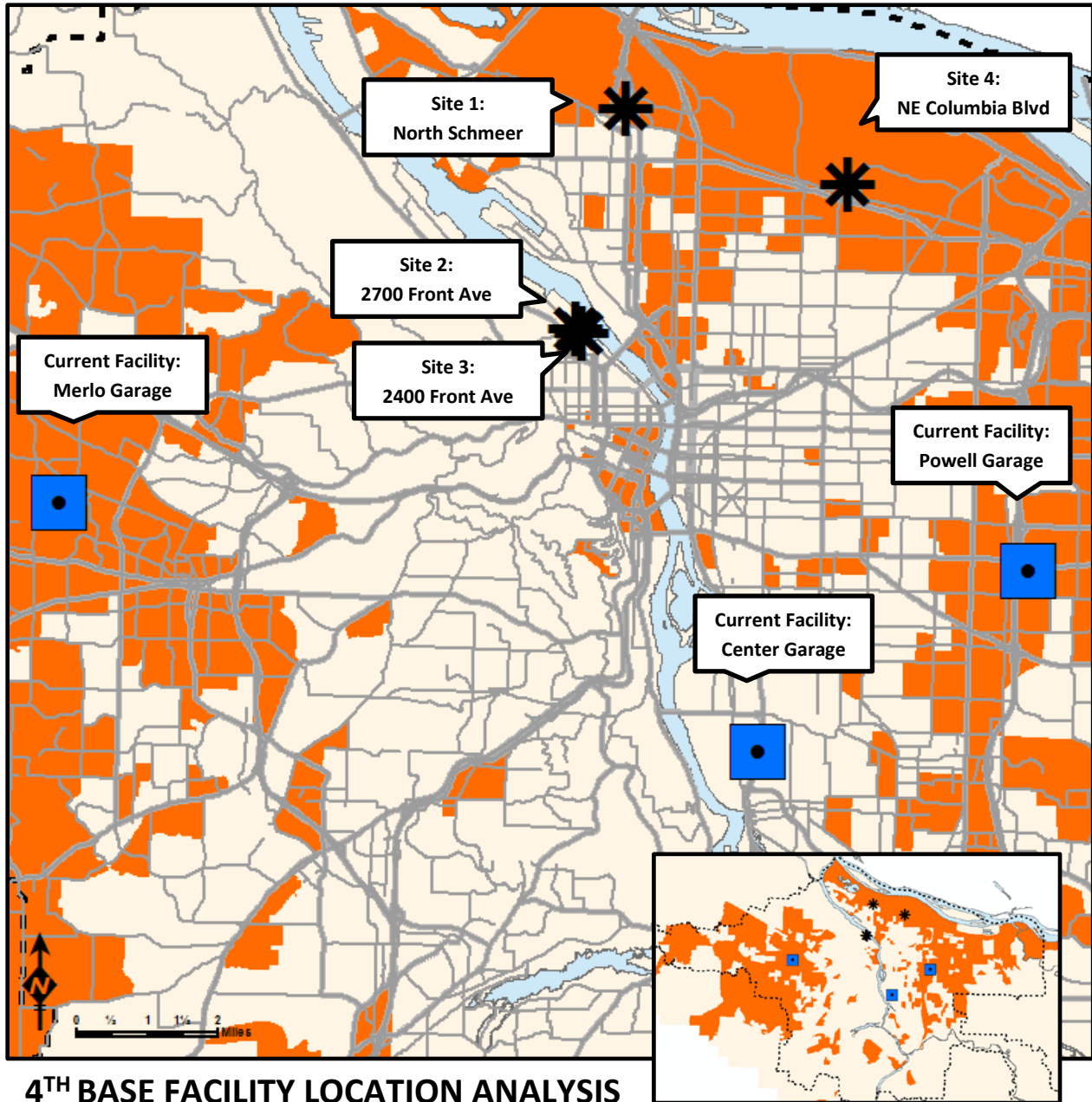
Site 4 is located on a lot occupied by Peterson Caterpillar. The near term plan for this company is to relocate to Hillsboro, Oregon once the construction of their new facility is completed. Site 4 is adjacent to several commercial and industrial properties as noted in Table 4. Although there are residential properties within a ¼ of mile of the property, there is a major arterial thoroughfare (US-30 Bypass – NE Lombard Street) as well as NE Columbia Boulevard that separates this site from nearby residences. Additionally, a berm runs parallel with NE 42nd Avenue and the Union Pacific railroad crossing that further separates this site from residential areas. While this area has high minority populations (48 percent), the impacts of the site are expected to be minimal given the aforementioned considerations.

The difference between each site is the expected traffic increases along each street segment due to the number of fixed route buses accessing each site. To inform these impacts, further analysis examined the deadhead routes for each potential bus yard and the number of buses that would use those routes. The maps shown in Appendix A through D provides an illustration of this assessment as well as a mapping of the model noted in Section 4 of this report. To reiterate, the algorithm utilized existing deadhead routes, a bus yard capacity of 208 buses for each potential site, and a spare ratio of 10 percent. This preliminary traffic analysis provided an evaluation tool aimed to reduce overall system-wide deadhead time by assigning existing routes to a new bus yard when optimal (i.e., save time for that route that are based out of existing garages and the number of buses reassigned would not exceed the yard capacity for each site). As noted, each site will pose local traffic concerns in their respective areas. To inform these concerns, a more in-depth traffic study will be performed once the agency moves forward with the selected site.

Preferred Site Selection

After careful consideration of all Title VI related impacts for each site, TriMet has selected Site 4 as the preferred location for the 4th bus operations and maintenance base. This site is the least discriminatory alternative and the selection of this site aligns with the Federal Transit Authority's Title VI guidance for selecting a site. Photographs of the selected site is shown in Appendix E.

Figure 3: Potential 4th Base Facility Sites and Minority Population



4TH BASE FACILITY LOCATION ANALYSIS

Site Alternatives and Minority Population

Minority Population by Block Group

- At or below district average
- Above district average

Sources: 2011-2015 American Community Survey, Metro RLIS

VI. Community Outreach

Initial community outreach to all four sites included direct mailings to the potentially impacted communities, including all business and residential properties within a ¼ of a mile from each site (See Appendix F). The notice, invited recipients to call or email TriMet with questions or comments, was mailed to approximately 693 neighbors (57% residential and 43% commercial). Limited English Proficient populations were also considered in the initial community outreach efforts to ensure meaningful awareness and input. That is, postcards were translated in Spanish, Chinese, and Vietnamese given the large presence of these populations in these areas (See Appendix G for translated postcard).

- TriMet received seven responses from all sites combined.
 - Site 1 – comments included the intention of another business looking to purchase this site for off-site parking.
 - Site 2 – comments (direct mailings and a face-to-face meeting on January 24, 2018) included concerns of how buses will operate, traffic, the potential environmental impacts as well as any mitigation efforts. Information on planned roadway improvements were presented by a Portland Bureau of Transportation representative
 - Site 3 – TriMet did not receive any response to these mailings.
 - Site 4 – comments included concerns for traffic volumes and routes near 42nd Avenue.

After identifying Site 4 as the preferred site for the 4th bus operations and maintenance base, TriMet carried out numerous public engagement activities, spanning from March 2018 through June 2018. This section demonstrates that TriMet has and will continue to implement a public engagement program that provides impacted populations with meaningful public involvement opportunities. The following describes how TriMet engaged the potentially impacted community:

- Follow up postcards were mailed on May 16, 2018 to business and residential properties within a ½-mile radius around Columbia site announcing site selection, use, and public involvement process. Spanish translations mailings were included.
 - TriMet received three responses. Comments included concerns for increased traffic congestion and safety on 42nd Avenue, particularly near Holman Street.
- Meetings with community stakeholders to inform the potential change in use of the site and to identify community interests and concerns. Feedback includes:
 - *Concordia Neighborhood Association* – interest in Prescott/Alberta bus line (Line Z in the North/Central Service Enhancement Plan). Stakeholders mentioned this could be a gesture of goodwill and a mitigation for the impacts of a new bus yard.
 - *Cully Association of Neighbors* – concerns about traffic and air quality; interests in jobs and service coverage in the Prescott area.
 - *Living Cully* – interest in local jobs and electrification of the bus fleet.
 - *Our 42nd Avenue* – interest in community stabilization via economic development and land development; better bus stop amenities and pedestrian environment on 42nd Ave; new

energy efficiency initiatives; job creation and establish partnerships with existing workforce programs; increase DBE representation; and concern for air quality.

- *NAYA* – interest in more transit service and safety on Columbia Blvd.
- *Verde* – interest in local job/contract sourcing; green technology.
- *Hacienda* – interest in more service in underserved areas and small business opportunities.
- *Columbia Corridor Association* – interest in jobs and electric buses; concerns for traffic impacts and signal design/timing implications for truckers and school buses along Columbia Blvd.
- *Columbia Slough Watershed Council* – interest in habitat restoration and preservation.
- Portland Community College – interest to partner with TriMet to hold future hiring events at the PCC Metropolitan Workforce Training Center and mechanic apprenticeship programs for alternative fuels/electric buses.

Summary of TriMet responses to the aforementioned interests and concerns:

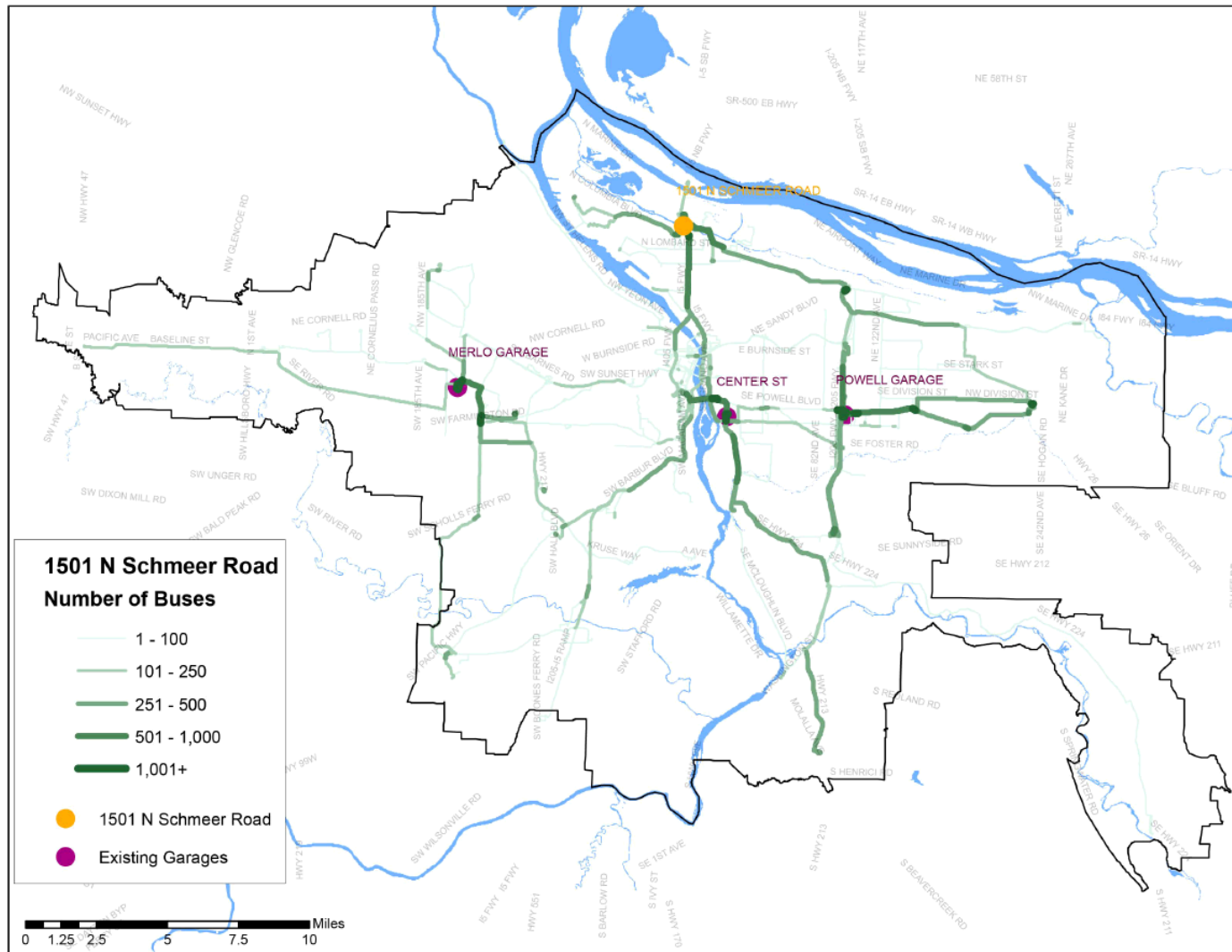
- Jobs – approximately 330 positions for Bus Operators, 30 positions for Journeyworkers, 15 positions for Service Workers, and 25 positions for Management, Training, and Other Support. A total of about 400 positions. TriMet will be hiring continually for the next several years and is planning recruitment activities in the vicinity of the Columbia site.
- Engineering and construction contracts – the cost of designing and building the facility is currently estimated around \$35 million, which could include dozens of full-time construction jobs. TriMet will continue its award-winning Disadvantaged Business Enterprise program to maximize contracting with firms owned by people of color and women.
- Roadway improvements – traffic studies are underway to determine what improvements TriMet will make to adjacent streets and sidewalks. It is likely that a traffic signal and bike/pedestrian crossing will be added at NE Columbia Boulevard and 42nd Avenue as well as sidewalks along our frontage.
- Columbia Slough habitat protection – the Columbia Slough flows along the north side of the site, where a 75-foot conservation zone will be protected. TriMet is committed to preserving and enhancing this important fish and wildlife habitat.
- Planned growth or land use effects – the proposed project is fully compatible with the short- and long-term zoning. TriMet has a comprehensive plan use of the site. By providing for more bus capacity in the region, this project will enable TriMet to support additional growth by mitigating traffic impacts throughout the region and providing affordable mobility for those with few other options.
- Air quality and traffic congestion – locating a garage in Northeast Portland -- where TriMet has some its most robust bus service -- allows buses to begin and end their routes closer to their home base. This minimizes the time buses spend in traffic between the garage and the start or end of their service route. Regionally, the proposed project will reduce air quality impacts. Riding transit significantly reduces emissions of both local pollutants and greenhouse gases compared to driving.

TriMet is beginning a broader transition to alternative fuels, but the timeline for replacing the entire bus fleet has not been determined and will take a number of years to replace the existing fleet as each bus reaches its useful life. To start, the new garage will domicile buses from the existing biodiesel-mix fleet, but the site design will allow for transition to alternative fuels as older buses are placed into retirement.

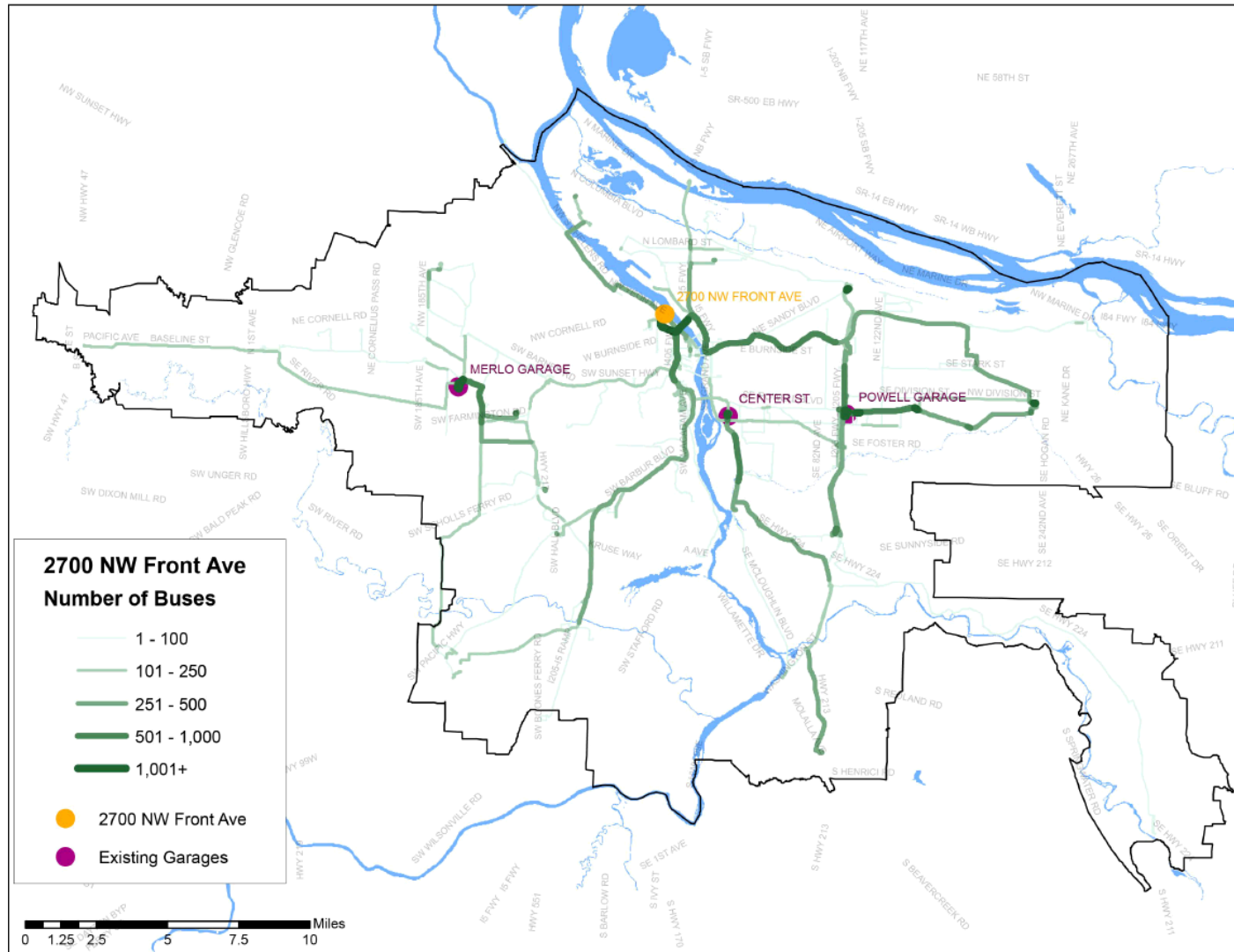
VII. Conclusion

This equity analysis has aimed to guide TriMet on selecting a 4th base facility location that does not result in disparate impacts on the basis of race, color, or national origin. The process by which TriMet identified and narrowed down potential sites for the facility was based on acquisition and capital costs, availability, property size (12+ acres), geographic proximity to the service area, transportation access, traffic analysis, and the rough deadhead cost analysis. Given this, the assessment of potential equity impacts and robust community outreach efforts, constructing the new 4th bus operations and maintenance base at the NE Columbia Boulevard location is expected to have minimal impacts in comparison to the other three sites.

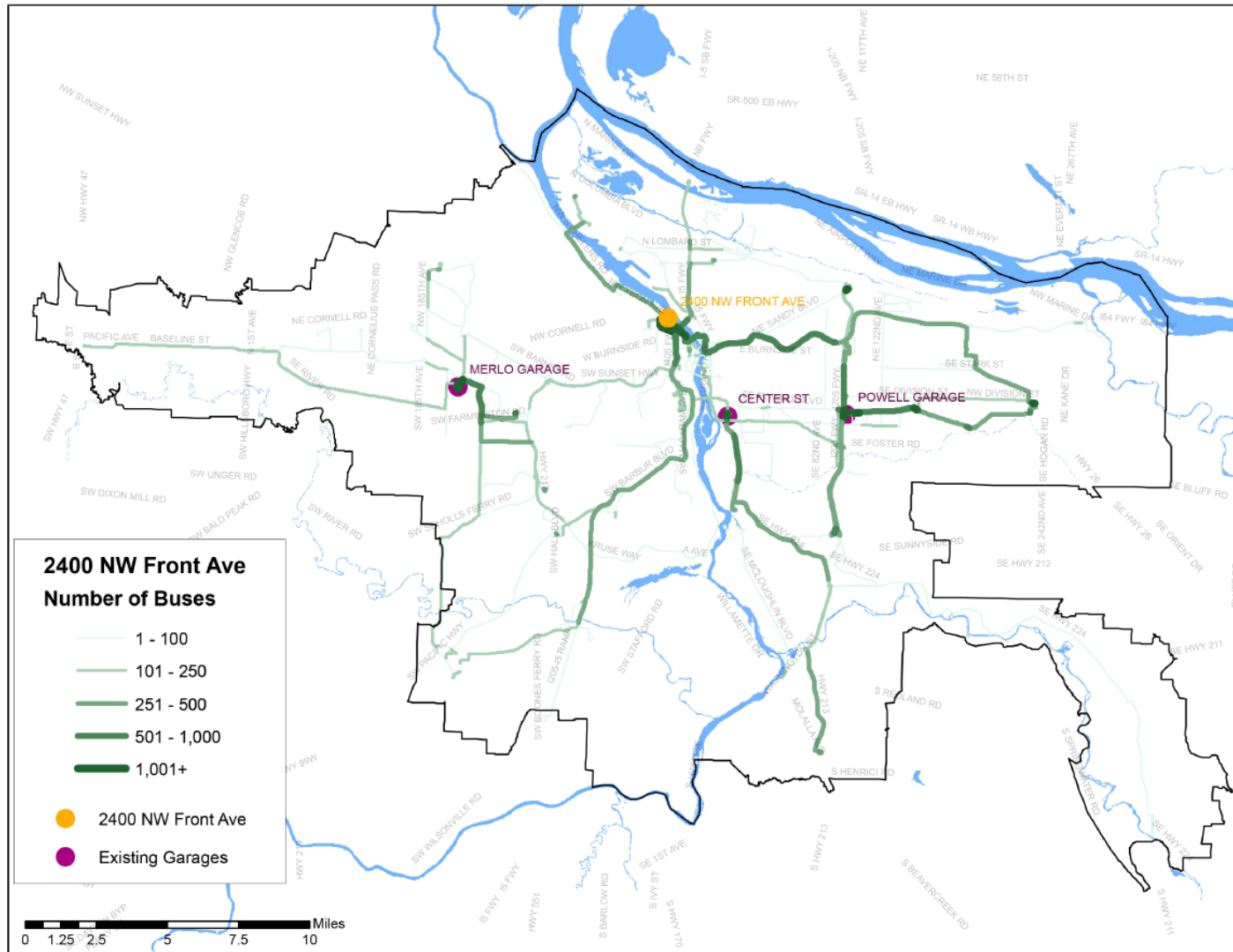
Appendix A: Deadhead Routes and Buses Traveling Over A One Week Period, October 2017



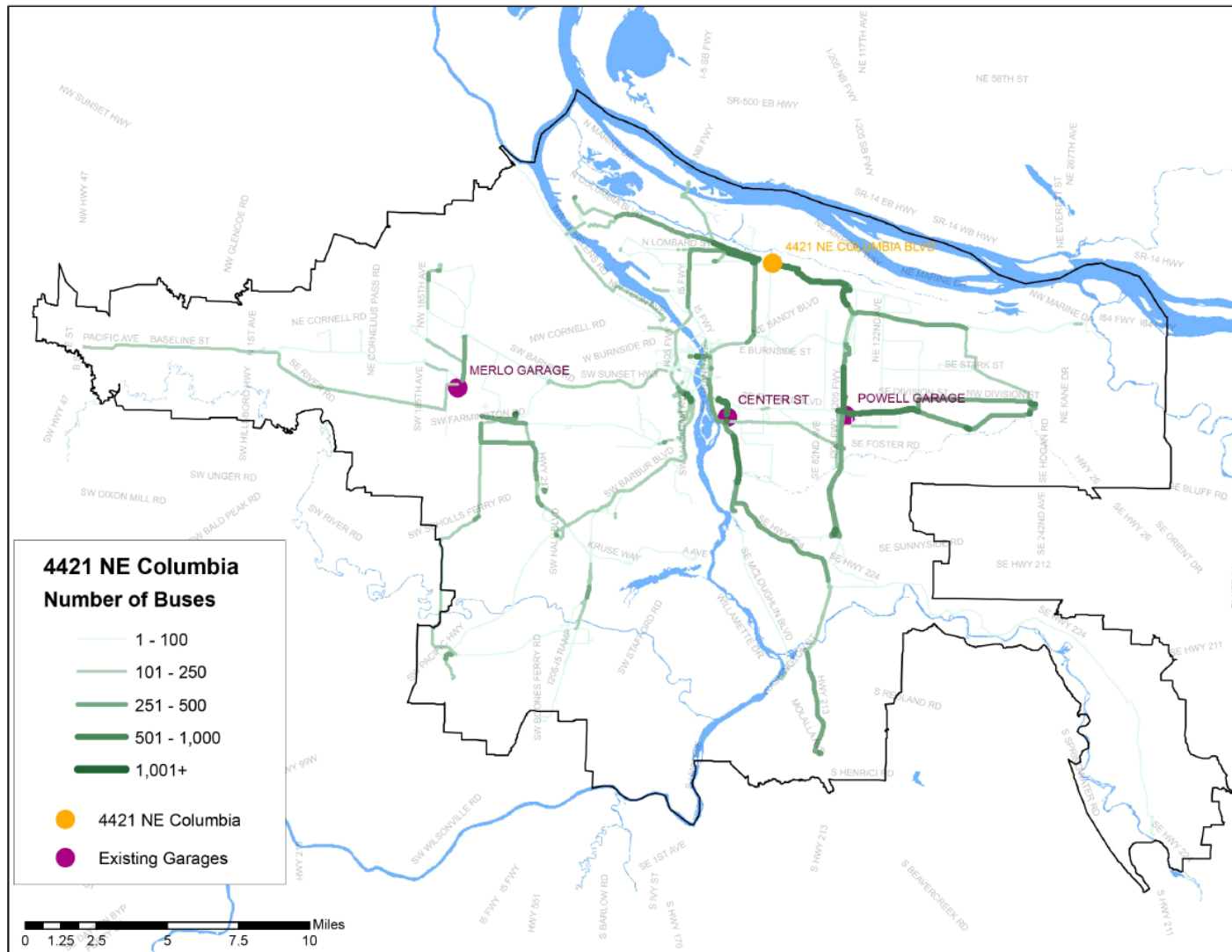
Appendix B: Deadhead Routes and Buses Traveling Over A One Week Period, October 2017



Appendix C: Deadhead Routes and Buses Traveling Over A One Week Period, October 2017



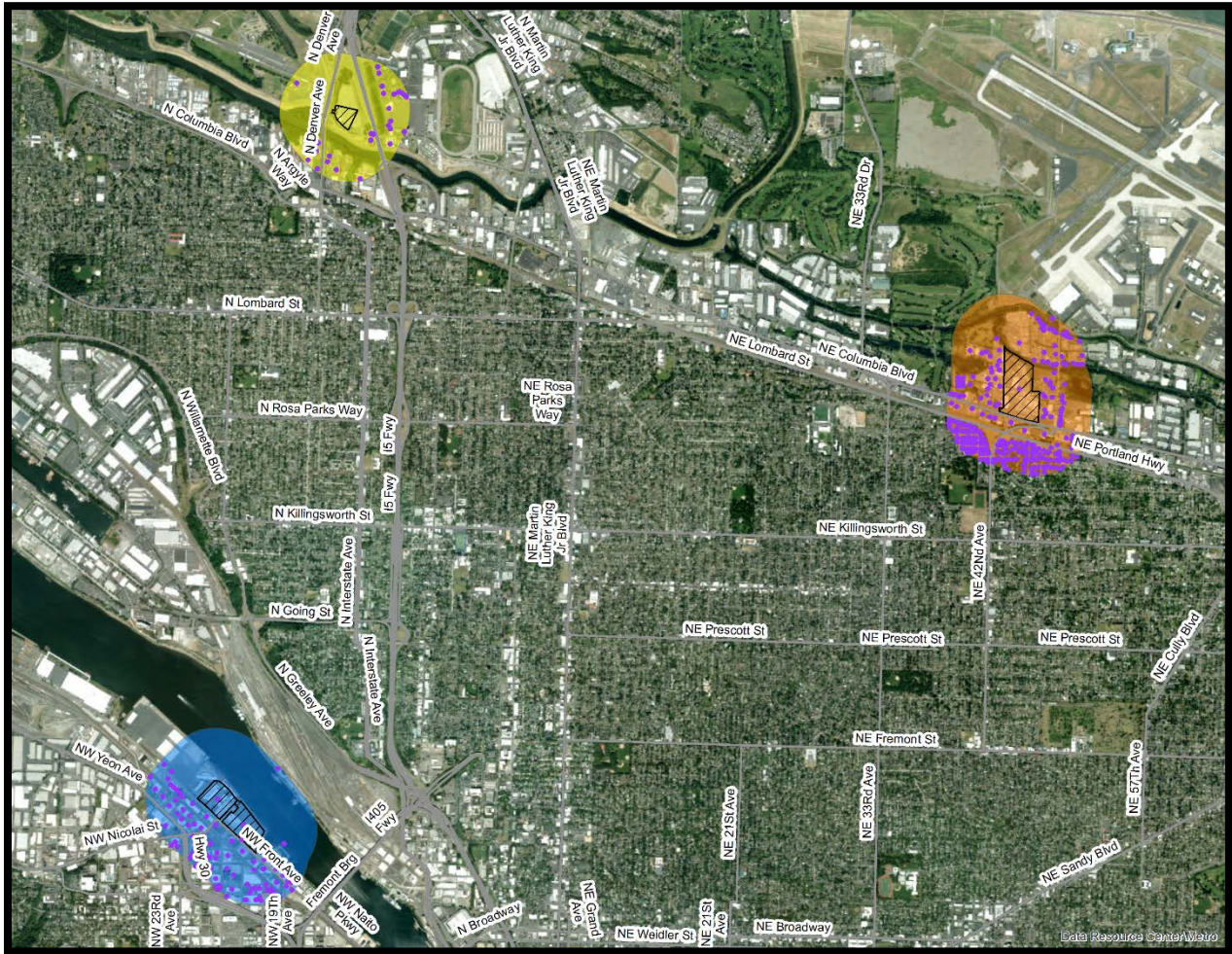
Appendix D: Deadhead Routes and Buses Traveling Over A One Week Period, October 2017



Appendix E: Photographs of Site 4



Appendix F: Map of Properties Receiving Postcard Mailing



Appendix G: Translated Postcard

Notice



Proposed site for a new bus garage

TriMet is continuing a 10-year expansion of transit throughout the Portland area that includes new bus lines and more frequent service. As our bus fleet grows, we have begun exploring several potential locations for a new bus garage. We would store and maintain vehicles here, as well as send buses out into service on various routes.

We plan to make a final decision and begin design in early 2018. Construction would start in 2018 or 2019 and we would begin using the facility as soon as it is complete.

We're considering building a new bus garage at **1501 N Schmeer Road**. If you have questions or feedback about this proposed location, contact Clay Thompson at thomsoc@trimet.org or call 503-962-6438.

Chúng tôi đang dự định xây một sân đậu xe buýt mới tại địa chỉ **1501 N Schmeer Road**. Nếu quý vị có thắc mắc hay đề nghị gì về địa điểm này, xin liên lạc với ông Clay Thompson bằng email thomsoc@trimet.org hoặc điện thoại số 503-962-6438.

我们正在考虑在**1501 N Schmeer** 路建一个新的公共汽车车库。如果您对该建议地点有任何疑问或反馈，请发送邮件 thomsoc@trimet.org，或拨打电话503-962-6438与 Clay Thompson联系。

170469 • 35 • 12/17



Appendix H: Updated Postcard

Notice



Update on TriMet's search for a new operations base

For several months, TriMet has been searching for a new bus garage to accommodate our continuing 10-year expansion of transit throughout the Portland area. Our search considered multiple locations around the region and the property located at **4421 NE Columbia Blvd** has been selected as the best fit for this new facility.

We're working with the property owner on a purchase offer and will soon release a request for proposal for design of the new facility. Construction would start in 2019 and we would begin operating the facility as soon as it's complete.

We will be scheduling public meetings to present ideas and solicit feedback. If you have questions about this proposed location, contact Jason Williams at WilliamJ@TriMet.org or call 503-962-2150.

Map on other side →

4/18



Date: July 25, 2018**To:** Board of Directors**From:** Doug Kelsey **Subject:** **RESOLUTION 18-07-55 OF THE TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET) DETERMINING CERTAIN REAL PROPERTY NECESSARY FOR A FOURTH BUS OPERATIONS AND MAINTENANCE FACILITY AND APPROVING A TITLE VI ANALYSIS FOR THE SITE**

1. Purpose of Item

The purpose of this item is to request that the TriMet Board of Directors (Board) adopt a resolution authorizing staff to make an offer to acquire by purchase or by the power of eminent domain certain real property located at 4421 NE Columbia Boulevard (Columbia Property) necessary to construct a fourth bus maintenance and operations facility to support service expansion and to approve the Title VI analysis in the Title VI report for the site.

2. Type of Agenda Item

- Initial Contract
- Contract Modification
- Other Declaration of Necessity of Real Property

3. Reason for Board Action

Chapter 267 of the Oregon Revised Statutes authorizes TriMet to acquire real property by purchase or eminent domain, and ORS 35.235 requires the Board to declare the necessity and purpose for which it is required. Further, Federal Transit Administration (FTA) Title VI Circular 4702.1B implementing Title VI of the Civil Rights Act, requires the Board to approve a Title VI analysis related to the siting of a bus facility.

4. Type of Action

- Resolution
- Ordinance 1st Reading
- Ordinance 2nd Reading
- Other _____

5. Background

In 2017, the Oregon Legislature passed House Bill 2017 (HB 2017), a statewide transit tax funded by the withholding of .001% of wages earned in Oregon. HB 2017 is expected to provide approximately \$51,000,000 per year to TriMet, starting in fiscal year 2020. A substantial portion of this amount must go to improving and expanding bus service throughout

the region, and the capital needs to support that expansion. Even before the passage of HB 2017, TriMet was embarking on a bus service expansion plan, funded by an incremental increase to the payroll tax that was approved by the Board in 2016 with step increases for each of the next ten years. As part of its service expansion plans, TriMet will increase its bus fleet from its current size of approximately 715 buses to about 853 buses in the year 2022 and 924 buses by 2025.

TriMet currently operates three bus maintenance and operations facilities: its Center Street facility on SE 17th Avenue, its Powell Garage at 9800 SE Powell Blvd, and its Merlo facility at 16130 SW Merlo Road in Beaverton. These three facilities are near capacity, and a new bus maintenance and operations facility is required in order for TriMet to house, maintain, and operate its expanding bus fleet. About one year ago, TriMet began a region-wide search for a site that would be appropriate for the fourth bus base. This search was performed both by internal real property staff and also by real estate brokers at Cushman & Wakefield. Initially, TriMet identified approximately 18 sites for consideration. TriMet established a New Revenue Strategy Steering Committee (Committee) to review and analyze each site against criteria established by staff and that allowed TriMet to determine which site best met its needs. The criteria included such factors as size, geographic location, acquisition and development costs, operational deadhead costs, zoning, and impact on current tenants and businesses.

The list of potential sites was eventually reduced to four, two of which were permanent sites and two of which were useable as temporary sites, in the event that a permanent site could not be located in a timely manner.

After significant discussion and consideration, the Committee decided that the Columbia Property is best suited for the new bus facility, for the following reasons, among others:

- a. Size – The Columbia Property is about 30 acres, an ideal size for both the near and long terms. TriMet anticipates being able to utilize this site for generations, and it has excellent potential for future expansion as TriMet continues to grow.
- b. Location – TriMet does not currently have a bus base in northeast Portland, and adding a base there would provide some geographical balance. The analysis of the impact on bus “deadhead” time and costs at the site was competitive with the other sites under consideration. The analysis also indicated that the Columbia Property has good access points and would provide good access to operator road relief points.
- c. Site Layout – The Columbia Property has approximately 15 buildings, several of which are immediately useable with relatively minor construction work, making the site more cost-effective than a site that would require construction of buildings from the ground up.
- d. No Business Disruption – The Columbia Property is currently occupied by Peterson Caterpillar, a business that sells and repairs heavy tractor equipment and parts. Peterson Caterpillar is in the process of moving into a new facility it constructed in Hillsboro, so TriMet’s acquisition of this site will not cause any disruption to its business.

- e. Community Engagement – TriMet has conducted engagement with community-based organizations and neighborhood associations in the area, including NAYA, Hacienda, Verde, and the Columbia Corridor Association. All are generally supportive, and TriMet is committed to continuing to work with these groups as the project moves forward. TriMet also sent postcards to all addresses in a half mile radius around the property informing neighbors of the proposed use and the public involvement process.
- f. No Disparate Impacts - TriMet conducted a Title VI analysis and drafted a Title VI Report (included in the Board materials), which determined that use of the Columbia Property as a bus facility does not result in disparate impacts on the basis of race, color, or national origin.

6. Procurement Process

TriMet staff and its real property brokers performed an extensive search, as described above, for a property that would be best suited for a new bus operations facility. After considering at least 18 sites throughout the region, the Committee determined that the Columbia Property best met the needs of the agency. TriMet has been engaged in negotiations with the owner regarding purchase of the site, but no agreement has been reached at this time.

7. Financial/Budget Impact

The purchase of the Columbia Property is included in the Capital Budget for FY 19-20.

8. Impact if Not Approved

This Resolution would declare the necessity for TriMet to acquire the Columbia Property for use as its new bus operations facility and approve the Title VI analysis contained in the Title VI report. Upon approval of the Resolution, TriMet staff will make a formal written offer to purchase the Columbia Property based on an independent appraisal and attempt to agree with the property owner related to the acquisition of the site. This Resolution does not authorize TriMet to file a condemnation lawsuit, and further Board authority would be required to do so. In the event negotiations are unsuccessful, staff could return to the Board to request authority to file a condemnation lawsuit for the property.

RESOLUTION 18-07-55

RESOLUTION OF THE TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET) DETERMINING CERTAIN REAL PROPERTY NECESSARY FOR A FOURTH BUS OPERATIONS AND MAINTENANCE FACILITY AND APPROVING A TITLE VI ANALYSIS FOR THE SITE

WHEREAS, ORS 267.200(2) and ORS 267.225(2) authorize and empower TriMet to acquire by condemnation, purchase, lease, devise, gift or voluntary grant real and personal property or any interest therein located inside the boundaries of TriMet; and

WHEREAS, House Bill 2017, passed by the Oregon Legislature, is expected to provide approximately \$51,000,000 per year to TriMet, a large portion of which will be spent on bus service expansion and the capital needs to provide the expansion; and

WHEREAS, TriMet currently has three bus maintenance and operations facilities, which are at or nearing capacity; and

WHEREAS, TriMet must construct a fourth bus maintenance and operations facility in order to accommodate the procurement and operation of additional buses, which are necessary to meet service expansion needs in the Portland metropolitan area; and

WHEREAS, ORS 35.235 requires the Board, after first declaring by resolution the necessity of the acquisition of real property and the purpose for which it is required, to attempt to agree with the owner of said real property with respect to compensation to be paid therefore, and the damages, if any, for the taking thereof; and

WHEREAS, the TriMet Board of Directors (Board), has reviewed and considered the Title VI analysis contained in the Title VI Report for the fourth bus maintenance and operations facility;

NOW, THEREFORE, BE IT RESOLVED:

1. That the Board approves the Title VI analysis in the Title VI report.
2. That for the accomplishment of the planned bus service expansion there is needed and required fee interest in certain real property specifically described in Exhibit A and shown generally in Exhibit B, and said exhibits are by this reference hereby adopted and made a part hereof as completely and fully as though set forth in full herein.
3. That the construction of a fourth bus operations and maintenance facility is necessary for the public interest, and has been planned, designed, located and will be constructed in a manner that will be most compatible with the greatest public good and the least private injury.

4. That TriMet staff is authorized and directed to make attempts to agree with the owner of the property and any other persons in interest as to the compensation to be paid for the property and damages, if any, for the taking thereof, and the General Manager or his designee is authorized to make a binding offer for such compensation.

Dated: July 25, 2018

Presiding Officer

Attest:

Recording Secretary

Approved as to Legal Sufficiency:



Legal Department

RESOLUTION 18-07-55

Exhibit A

Order No.: 45141804190

EXHIBIT "A" Legal Description

PARCEL 1:

A tract of land located in the Northwest one-quarter of Section 18, Township 1 North, Range 2 East of the Willamette Meridian, in the City of Portland, County of Multnomah and State of Oregon, more particularly described as follows:

Beginning at the intersection of the East line of the William Hall Donation Land Claim with the Northerly line of N.E. Columbia Boulevard (C.R. #3824), said point being North 00°37'00" East, 40.61 feet from road angle 12 of C.R. #527 and also being 886.78 feet Northerly from the Southeast corner of said Hall Donation Land Claim; thence South 79°31'00" East along said Columbia Boulevard, 127.59 feet to an intersection with the South line of that certain tract recorded January 27, 1949, in Book 1316, Page 407, Deed Records of said County; thence South 83°25'29" East, 68.67 feet to the West line of N.E. 46th Avenue; thence North 01°25'00" East along said N.E. 46th Avenue, 780.90 feet; thence North 88°35'00" West, 204.93 feet to said East line of the Hall Donation Land Claim; thence North 00°37'00" East along said Donation Land Claim 697.45 feet to the center of an arm of the Columbia Slough; thence Northwesterly along the center of said slough the following courses: North 62°37'00" West, 234.28 feet; thence North 58°06'00" West, 174.16 feet; thence North 57°18'00" West, 429.70 feet to the East line of the land of Charles H. Payne; thence South 00°17'50" East along said line of the Payne tract, 1571.68 feet to the Northeast corner of that tract conveyed by Deed recorded February 21, 1974, in Book 972, Page 1480, Deed Records; thence West, 95.78 feet; thence South 00°17'50" East, 94.78 feet to the Northerly line of N.E. Columbia Boulevard (C.R. #3824); thence South 73°36'00" East along said Columbia Boulevard, 100.00 feet to said line of the Payne tract; thence continuing along said Columbia Boulevard South 73°36'00" East, 510.32 feet to a point of curve 35 feet opposite Engineer's Station 152+68.79 E.C.; thence on a 1397.40 foot radius curve to the left with a chord that bears South 76°33'30" East, 144.24 feet, an arc distance of 144.30 feet to a point of tangency 35 feet opposite Engineer's Station 151+20.87 B.C.; thence South 79°31'00" East, 64.30 feet to the point of beginning.

PARCEL 2:

A tract of land located in the Northwest one-quarter of Section 18, Township 1 North, Range 2 East of the Willamette Meridian, in the City of Portland, County of Multnomah and State of Oregon, more particularly described as follows:

Beginning at the intersection of the East line of the William Hall Donation Land Claim with the Northerly line of N.E. Columbia Boulevard (C.R. #3824), said point being North 00°37'00" East 40.61 feet from road angle 12 of C.R. #527 and also being 886.78 feet Northerly from the Southeast corner of said Hall Donation Land Claim; thence South 79°31'00" East along said Columbia Boulevard, 127.59 feet to an intersection with the South line of that certain tract recorded January 27, 1949, in Book 1316, Page 407, Deed Records of said County which is the true point of beginning; thence South 83°25'29" East, 68.67 feet to the West line of N.E. 46th Avenue; thence South 01°25'00" West along said N.E. 46th Avenue 4.74 feet to the Northerly line of N.E. Columbia Boulevard; thence North 79°31'00" West along said North line of N.E. Columbia Boulevard 69.26 feet to the true point of beginning.

PARCEL 3:

The following described parcel of land located in the Northwest one quarter of Section 18, Township 1 North, Range 2 East, in the City of Portland, County of Multnomah and State of Oregon:

Beginning at Road Angle No. 12 in the center of County Road No. 527 (Northeast Columbia Boulevard) ; thence North 1° 25' East, 20.70 feet to the Northerly line of said County Road No. 527; thence South 73° 36' East, 4.32 feet along the Northerly line of said County Road; thence South 79° 31' East along the Northerly line of said County Road, a distance of 212.62 feet to the center of a 40 foot roadway known as Northeast 46th Avenue; thence North 1° 25' East along the center line of said Northeast 46th Avenue, a distance of 809.17 feet to the true place of beginning of the tract of land herein described; thence North 88° 35' West 214.14 feet; thence North 1°

RESOLUTION 18-07-55

Exhibit A

Order No. 45141804190

EXHIBIT "A"

Legal Description

25' East 50.0 feet; thence South 88° 35' East 214.14 feet; thence South 1° 25' West, 50.0 feet to the true place of beginning.

EXCEPTING THEREFROM the rights of the public in and to the East 20 feet of the above described tract of land.

PARCEL 4:

A tract of land situated in the Northwest one-quarter of Section 18, Township 1 North, Range 2 East of the Willamette Meridian, in the City of Portland, County of Multnomah and State of Oregon, more particularly described as follows:

Commencing at a 4-1/4" diameter brass cap marking the West one-quarter corner of said Section 18; thence North 01° 47' 47" East, a distance of 603.96 feet to a point in the center line of NE Columbia Boulevard (70 feet wide), said point also being the point of intersection of the center line of NE 42nd Avenue (45 feet wide) with said center line of NE Columbia Boulevard; thence North 00° 19' 30" West, along the center line of said NE 42nd Avenue 205.70 feet; thence North 89° 40' 30" East, a distance of 20.00 feet to a brass screw with a 3/4" diameter brass washer stamped "Marx Assocs" marking the Southwest corner of Parcel IV of that tract conveyed to Don W. and Bonnie L. Thomas, LLC, as described in Recorder's Fee No. 2002-159286, Deed Records, Multnomah County, said corner also being a point on the East right-of-way line of said NE 42nd Avenue, and the point of beginning of the tract herein to be described; thence North 00° 19' 30" West, along said East right-of-way line, a distance of 149.65 feet a brass screw with a 3/4" diameter brass washer stamped "Marx Assocs"; thence North 89° 37' 05" East, a distance of 70.28 feet to a 5/8 inch iron rod with a yellow plastic cap stamped "Marx Assocs"; thence North 43° 34' 56" East, a distance of 21.18 feet to a 5/8 inch iron rod with a yellow plastic cap stamped "Marx Assocs"; thence North 01° 17' 00" West, a distance of 180.29 feet to a 5/8 inch iron rod with a yellow plastic cap stamped "Marx Assocs"; thence North 87° 32' 29" East, a distance of 22.11 feet to a 5/8 inch iron rod with a yellow plastic cap stamped "Marx Assocs"; thence North 00° 55' 00" West, a distance of 40.96 feet to a 5/8 inch iron rod with a yellow plastic cap stamped "Marx Assocs" in the North line of Parcel I of said Thomas tract; thence North 89° 40' 30" East, along said North line, a distance of 136.15 feet to the Northeast corner thereof; thence South 00° 19' 30" East along the East line of Parcels I, II, III & IV of said Thomas tract, a distance of 387.03 feet to the Southeast corner thereof; thence South 89° 40' 30" West, along the South line of Parcel IV of said Thomas Tract, a distance of 239.78 feet to the point of beginning.

RESOLUTION 18-07-55
Exhibit B



LEGEND

4421 NE Columbia Blvd

	Shell	Office	Total		Shell	Office	Total
Building 1 & 2	66,389	23,815	84,978	Building 9	12,300	492	12,792
Building 3	23,815	1,191	25,006	Building 10	31,805	11,450	43,255
Building 4	16,960	678	17,638	Building 11	3,000	0	3,000
Building 5	4,800	0	4,800	Building 12	2,880	0	2,880
Building 6	14,180	284	14,464	Building 13	1,600	0	1,600
Building 7	43,182	6,477	49,659	Building 14	1,440	0	1,440
Building 8	6,150	0	6,150	Building 15	1,300	0	1,300

Attachment I

FY2018 Annual Service Plan Equity Analysis



Equity Analysis: FY2018 Annual Service Plan

April 5, 2017

Executive Summary

TriMet is proposing to implement several service improvements in fall 2017 and spring 2018. In accordance with Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B, TriMet conducts an Equity Analysis any time Major Service Changes are proposed to ensure that changes do not unfairly impact people of color and low-income populations. The service proposal for the next year includes Major Service Changes to ten bus lines, including two brand new lines. Thus, an analysis is required prior to the TriMet Board of Directors taking action.

Methodology

TriMet's Title VI Program outlines the agency's Major Service Change, Disparate Impact, and Disproportionate Burden policies, as well as the way in which TriMet conducts Equity Analyses. Major Service Changes are analyzed both for potential adverse effects and distribution of benefits. This is done at both the individual line-level and system-level, and the analysis seeks to identify any potential disparities based on race/ethnicity or income.

Major Service Changes

The proposed addition of two brand new bus lines, the creation of one new bus line by combining portions of two existing lines, and the proposed changes to eight existing lines meet TriMet's established thresholds for Major Service Changes:

- Denney/Hall Line (New)
- E 162nd Ave Line (New)
- South Gresham Line (New)
- Line 6-Martin Luther King Jr Blvd
- Line 33-McLoughlin/King Rd
- Line 44-Capitol Hwy/Mocks Crest
- Line 52-Farmington/185th
- Line 77-Broadway Halsey
- Line 81-Kane/257th
- Line 87-Airport Way/181st
- Line 152-Milwaukie

Findings

1. The vast majority of improvements are on lines with **average-or-above minority and low-income populations** in their service areas. As a result, a greater share of the region's minority and low-income populations stand to **benefit** as compared to non-minority and higher income populations.
2. Found **no disproportionate and adverse effects** from the one major service reduction (Line 152). Proposed changes do reduce access to some jobs in North Clackamas County while reducing travel time and increasing frequency to others.

I. Background

Building upon several years of ongoing service improvements, TriMet's Annual Service Plan for FY2018¹ proposes Major Service Changes to eight bus lines and the addition of two new bus lines. Other changes will involve additional peak hour trips on over-loaded lines and improvements in on-time performance for lines with high ridership but lower current reliability. Though these changes will represent improvements for riders on those lines, they are not large enough changes to be reviewed as Major Service Changes. The Major Service Changes presented here represent the large majority of TriMet's proposed changes for FY18. The changes are made possible by the TriMet Board of Directors' approval of a ten year payroll and self-employment tax rate increase in 2015.

TriMet has been engaging the community for the past few years to develop a shared vision for future transit service that will guide how the additional revenue is invested. Each year, TriMet staff will use information developed from the shared vision planning efforts and outreach, updated analyses and measures, and additional outreach to prioritize incremental service improvements for that year. The efforts will focus on five factors defined by the TriMet Board: demand, productivity, connections, equity, and growth. Each year's plan will also consider safety, budget availability, and availability of staff and equipment to provide for expanded service.

This report documents the equity analysis conducted for these changes.

II. TriMet Title VI Compliance

As a recipient of Federal Transit Administration ("FTA") financial assistance, TriMet must ensure that service changes – both increases and reductions – comply with Title VI of the Civil Rights Act of 1964, which states:

"No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

The FTA has provided specific implementing guidelines and regulations for complying with Title VI in Circular 4702.1B ("Circular"). The Circular instructs transit agencies to consider impacts of Major Service Changes on low-income populations as well as minority populations by conducting a service equity analysis. Figure 1 shows the general sequence of steps and considerations in the equity analysis process.

TriMet's Title VI Program ² outlines the agency's policies, definitions and procedures for complying with Title VI and performing equity analyses. As required by the Circular, this includes the agency's Major Service Change, Disparate Impact, and Disproportionate Burden policies, as set forth below.

¹ Fiscal year 2018 runs from July 1, 2017 to June 30, 2018.

² TriMet's Title VI Program was updated and submitted to FTA in fall 2017

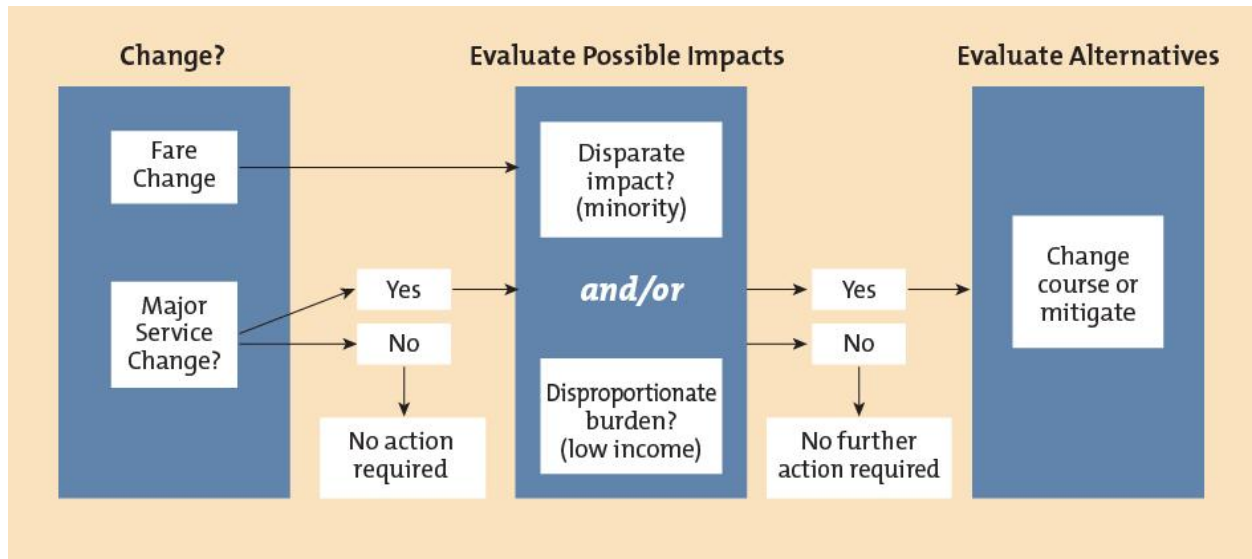


Figure 1: Overview of TriMet's Title VI Equity Analysis process

A. Major Service Change Policy

All changes in service meeting the definition of Major Service Change are subject to a Title VI Equity Analysis prior to Board approval of the service change. A Title VI Equity Analysis will be completed for all Major Service Changes and will be presented to the Board for its consideration and included in the subsequent TriMet Title VI Program with a record of action taken by the Board.

A **Major Service Change** is defined as:

1. A change to **15% or more of a line's route miles**. This includes routing changes where route miles are neither increased nor reduced (i.e. re-routes), or;
2. A change of **15% or more to a line's span** (hours) of service on a daily basis for the day of the week for which a change is made, or;
3. A change of **15% or more to a line's frequency** of service on a daily basis for the day of the week for which a change is made, or;
4. A single transit line is **split** into two or more transit lines, or;
5. A **new transit line** is established.

A Major Service Change occurs whether the above thresholds are met:

- a) Within a single service proposal, or;
- b) Due to a cumulative effect of routing, span, or frequency changes over the three years prior to the analysis

B. Disparate Impact Policy

Testing for Disparate Impact evaluates effects on minority riders or populations as compared to non-minority riders or populations. “Minority” is defined as all persons who identify as being part of racial/ethnic groups besides white, non-Hispanic.

In the course of performing a Title VI Equity Analysis for possible disparate impact, TriMet will analyze how the proposed major service change or fare change action could impact minority populations, as compared to non-minority populations.

In the event the proposed action has an adverse impact that affects protected populations more than other populations at a level that exceeds the benchmarks established in the adopted Disparate Impact Policy, or that restricts the benefits of the service change to protected populations, the finding would be considered as a potential Disparate Impact. Given a potential Disparate Impact, TriMet will evaluate whether there is an alternative that would serve the same objectives and with a more equitable impact. Otherwise, TriMet will take measures to minimize or mitigate the adverse impact of the proposed action.

The Disparate Impact Policy defines measures for determination of potential Disparate Impact on minority populations resulting from Major Service Changes or any change in fares. The policy is applied to both adverse effects and benefits of Major Service Changes. Adverse effects of service changes are defined as:

1. A decrease in the level of transit service (span in days and/or hours, and/or frequency); and/or
2. Decreased access to comparable transit service, which is defined as an increase of the access distance to beyond one-quarter mile of bus stops or one-half mile of rail stations.

The determination of disparate impact associated with service changes is defined separately for impacts of changes on an individual line, and for system-level impacts of changes on more than one line, as well as for both service reductions and service improvements.

1. In the event of potential adverse effects resulting from service reductions:
 - a) A Major Service Change to a *single line* will be considered to have a potential Disparate Impact if the percentage of impacted minority population in the service area of the line exceeds the percentage of minority population of the TriMet District as a whole by at least 3 percentage points (e.g., 31 percent compared to 28 percent).
 - b) To determine the *system-wide* impacts of Major Service Change reductions on more than one line, the percentage of the TriMet district’s minority population that is impacted is compared to the percentage of the TriMet district’s non-minority population that is impacted. If the percentage of the minority population impacted is at least 20 percent greater than the percentage of the non-minority population impacted (e.g., 12 percent compared to 10 percent), the overall impact of changes will be considered disparate.

2. In the event of service improvements:

- a) A major service change to a *single line* will be considered to have a potential Disparate Impact if:
 - i. The improvement is linked to other service changes that have disproportionate and adverse effects on minority populations, or;
 - ii. The percentage of impacted minority population in the service area of the line is less than the percentage of minority population of the TriMet District as a whole by at least 3 percentage points (e.g., 25 percent compared to 28 percent).
- b) To determine the *system-wide* impacts of major service change improvements on more than one line, the percentage of the TriMet district's minority population that is impacted is compared to the percentage of the TriMet district's non-minority population that is impacted. If the percentage of the minority population impacted is at least 20 percent less than the percentage of the non-minority population impacted (e.g., 8 percent compared to 10 percent), the overall impact of changes will be considered disparate.

3. Additional considerations to complement the quantitative Disparate Impact analysis above may include evaluating impacts to accessing employment, education, food, or health care for minority populations.

Upon determination of Disparate Impact, TriMet will either:

- a) Alter the service proposal to avoid, minimize, or mitigate potential Disparate Impacts, or;
- b) Provide a substantial legitimate justification for keeping the proposal as-is, and show that there are no alternatives that would have a less Disparate Impact on minority riders but would still accomplish the project or program goals.

C. Disproportionate Burden Policy

Testing for Disproportionate Burden evaluates potential effects on low-income riders or populations, defined as at or below 150% of the federal poverty level. The line and system level evaluations are identical to those used to determine potential Disparate Impacts, but compare low-income and higher income populations rather than minority and non-minority populations.

III. Proposed Service Changes

A. Description of Changes

Table 1 lists the proposed service changes by the quarter in which they would take effect. Most changes proposed for the next year are service increases. However, two of the proposed changes – to Line 81 and Line 152 – include the removal of service to some stops as part of their proposed routing changes.

Table 1: Proposed service changes in FY18 Annual Service Plan

Quarter	Line	Service Change Description
Fall 2017	6-Martin Luther King Jr Blvd	➤ Change route to serve Delta Park retail center.
	52-Farmington/185th	➤ Add weekday midday and weekend midday trips.
	81-Kane/257th	➤ Change route to serve Division St. in Gresham and provide service to Troutdale Reynolds Industrial Park instead of Glen Otto Park.
	87-Airport Way/181 st	<ul style="list-style-type: none"> ➤ Split into two lines at SE 182nd Ave & Powell ➤ Add weekend service to line running between Gateway Transit Center and SE 182nd Ave & Powell. ➤ All trips between Gateway Transit Center and SE 185th Ave/Rockwood will be extended to SE 182nd Ave & Powell.
	152-Milwaukie	<ul style="list-style-type: none"> ➤ Change route to serve SE Harmony Rd instead of Kellogg Creek Rd and the Milwaukie Marketplace. ➤ Increase weekday frequency.
	South Gresham Line (New)	➤ Combine portions of current Lines 81 and 87 to form new bus line.
Spring 2018	33-McLoughlin/King Rd	➤ Increase frequency on King Rd portion to better match service on McLoughlin Blvd.
	44-Capitol Hwy/Mocks Crest	➤ Add weekday midday trips between downtown Portland and St. Johns.
	77-Broadway/Halsey	➤ Add weekday midday trips
	Denney/Hall Line (New)	➤ New line connecting Beaverton Transit Center, Washington Square, and Tigard Transit Center.
	E 162 nd Ave Line (New)	➤ New line serving E 162 nd Ave in East Portland

Note: The FY18 Annual Service Plan also includes some minor changes to several bus lines for the purpose of addressing reliability and capacity issues. These changes are not included in this analysis because they are too small to reach the Major Service Change threshold.

B. Major Service Change Test

To determine whether individual service changes meet the definition of Major Service Change, current and proposed service are compared in terms of route length, frequency, and span (hours) of service. Changes of 15% or more qualify as Major Service Changes, including changes meeting this threshold cumulatively over the course of three years.

Results of the comparison are shown in Table 2. To summarize, these changes meet TriMet's adopted Title VI Major Service Change definition:

Denney/Hall Line: New bus line

E 162nd Ave Line: New bus line

South Gresham Line: New bus line created by splitting Line 87 and combining with portion of current Line 81

Line 6-Martin Luther King Jr Blvd: Route length change of over 15%

Line 33-McLoughlin/King Rd: Change in span of over 15% on Saturdays and Sundays

Line 44-Capitol Hwy/Mocks Crest: Frequency increase of over 15%

Line 52-Farmington/185th: Frequency increase of over 15% on Saturdays and Sundays

Line 77-Broadway Halsey: Frequency increase of over 15% since fall 2014

Line 81-Kane/257th: Route length changes of over 15%

Line 87-Airport Way/181st: Split line; Frequency increase of over 15% on weekdays; New weekend service

Line 152-Milwaukie: Route length change of over 15%; Frequency increase of over 15%

Table 2: Results of Major Service Change test by line

Line	Change in Route Length	Change in Span	Change in Frequency	Line Split	New Line or New Service
Denney/Hall Line					✓
E 162 nd Ave Line					✓
South Gresham Line					✓
6-Martin Luther King Jr Blvd	+17%				
33-McLoughlin/King Rd (Saturday)		+42%			
33-McLoughlin/King Rd (Sunday)		+48%			
44-Capitol Hwy/Mocks Crest (Weekday)			+18%		
52-Farmington/185 th (Weekday)			+12%		
52-Farmington/185 th (Saturday)			+16%		
52-Farmington/185 th (Sunday)			+16%		
77-Broadway/Halsey (Weekday)			+15%*		
81-Kane/257 th	+69% -59%**				
87-Airport Way/181 st (Weekday)			+68%	✓	
87-Airport Way/181 st (Saturday)					✓
87-Airport Way/181 st (Sunday)					✓
152-Milwaukie	+15% -44%**		+19%		

*Line 77 met the Major Service Change threshold due to cumulative changes since fall 2014

**Proposed routing changes to Lines 81 and 152 include both removing and adding portions to each line.

C. Line-level Analyses

Having identified the service changes which meet the definition of Major Service Change, the next step in the analysis is to look at each line individually to determine potential Disparate Impacts (minority populations) and/or Disproportionate Burdens (low-income populations). Both service reductions and service increases are analyzed. For service reductions, the analysis examines whether *adverse effects* are disproportionately borne by minority and/or low-income populations. On the other hand, for service increases the analysis examines the extent to which the *benefits* of the improvements are inclusive of minority and low-income populations.

The line-level analysis compares minority and low-income populations for the service area of each line proposed for a Major Service Change to the minority and low-income populations of the TriMet District as a whole. The analysis is separated by type of service change being proposed:

1. Major Service Reduction
2. Major Service Increases
3. Other Major Service Changes

1. Major Service Reduction

For service reductions the analysis examines whether *adverse effects* (defined on pg. 3) are disproportionately borne by minority or low-income populations. If *adverse effects* are identified and a line's minority and/or low-income populations are at least 3 percentage points greater than the minority or low-income populations for the TriMet District as a whole, the proposed change is flagged as a potential Disparate Impact or Disproportionate Burden.

The proposal for the Line 152 includes the only Major Service Reduction in this service plan.

➤ **Line 152 (Route streamlining, including stop removals)**³

The Line 152 route change would improve connections between downtown Milwaukie, Clackamas Community College Harmony campus, and Clackamas Town Center. Doing so would remove Line 152 service from a total of 26 stops, including both directions of service. Twenty-two of these stops (which serve 81 out of the 89 daily ons/offers) have comparable service within ¼ mile, and the population in the surrounding area is **17% minority** and **18% low-income**, as shown in Figures 4 and 5.

Four stops, where the remaining 8 daily ons/offers occur, do not have comparable service within ¼ mile, thereby meeting the definition of *adverse effect* (see Table 3). The population in the area surrounding these stops is **12% minority** and **12% low-income**, which are below the Disparate Impact threshold (31%) and Disproportionate Burden threshold (27%) for Major Service Reductions. Thus, there is **no Disparate Impact** and **no Disproportionate Burden**.

Table 3: Stops and populations impacted by routing changes to Line 152-Milwaukie

	No. of Stops	Total daily ons/offers (weekdays)	Pct. Population Minority	Pct. Population Low-Income
Service Removed	26	89	17%	18%
Nearest comparable service				
Less than ¼ mile	22	81	17%	18%
Over ¼ mile*	4	8	12%	12%

*Adverse effect applies

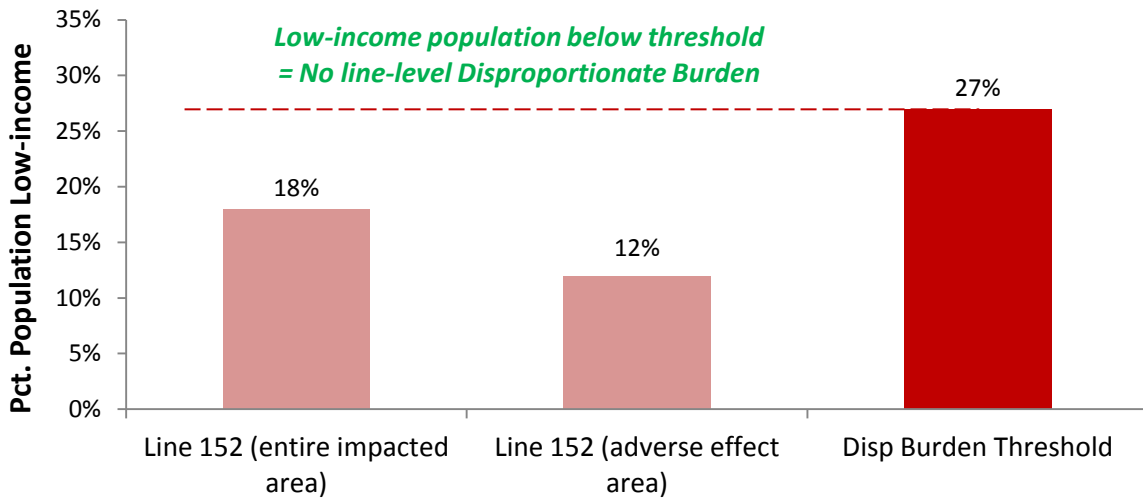
³ This section only analyzes the service reduction component of the Line 152 service change proposal. The analysis of the service increase component is provided in the next section.

Figure 4: Minority Population Comparison
 Proposed Line 152 Major Service Reduction & Disparate Impact Threshold



Source: 2010-2014 American Community Survey, block group level

Figure 5: Low-income Population Comparison
 Proposed Line 152 Major Service Reduction & Disproportionate Burden Threshold



Source: 2010-2014 American Community Survey, block group level. Low-income defined as at or below 150% federal poverty level.

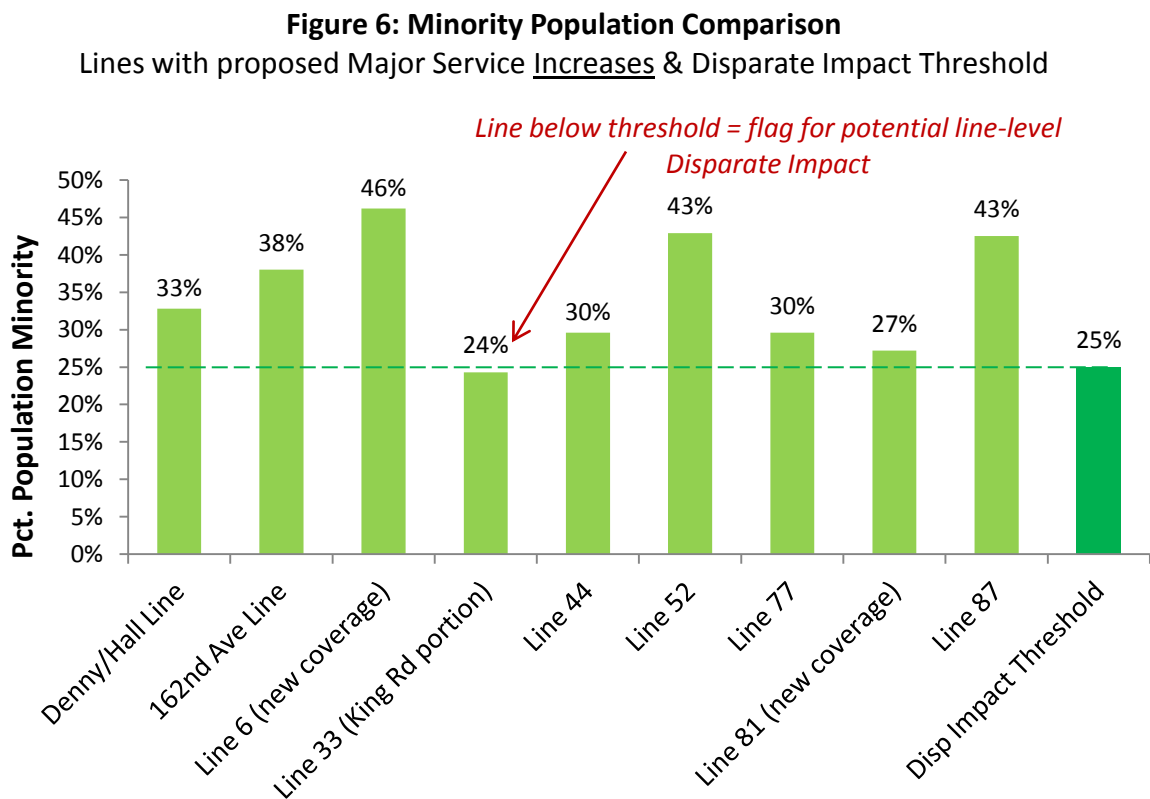
In terms of access⁴, this change would remove service from:

- About 4,700 jobs
 - 50% are low-to-medium wage jobs, which is lower than the TriMet district average
 - 9% are jobs held by people of color, which is lower than the TriMet district average
 - 7% are jobs held by Hispanic/Latino workers, which is slightly lower than the TriMet district average
- 1 professional technical center for high school students
- 1 community health care service center

2. Major Service Increases

For service increases, the analysis examines the extent to which the *benefits* of the improvements are inclusive of minority and low-income populations.

Figure 6 displays the minority population along each line⁵ proposed for a major increase as compared to the 25% Disparate Impact threshold. Figure 7 displays the low-income population along each line as compared to the 21% Disproportionate Burden threshold. Because these are proposed service increases, protected populations *falling below* these thresholds are flagged for potential concerns. The narrative analysis of each individual line follows, which includes further considerations of access to jobs, education, health care, and food for minority and low-income populations.

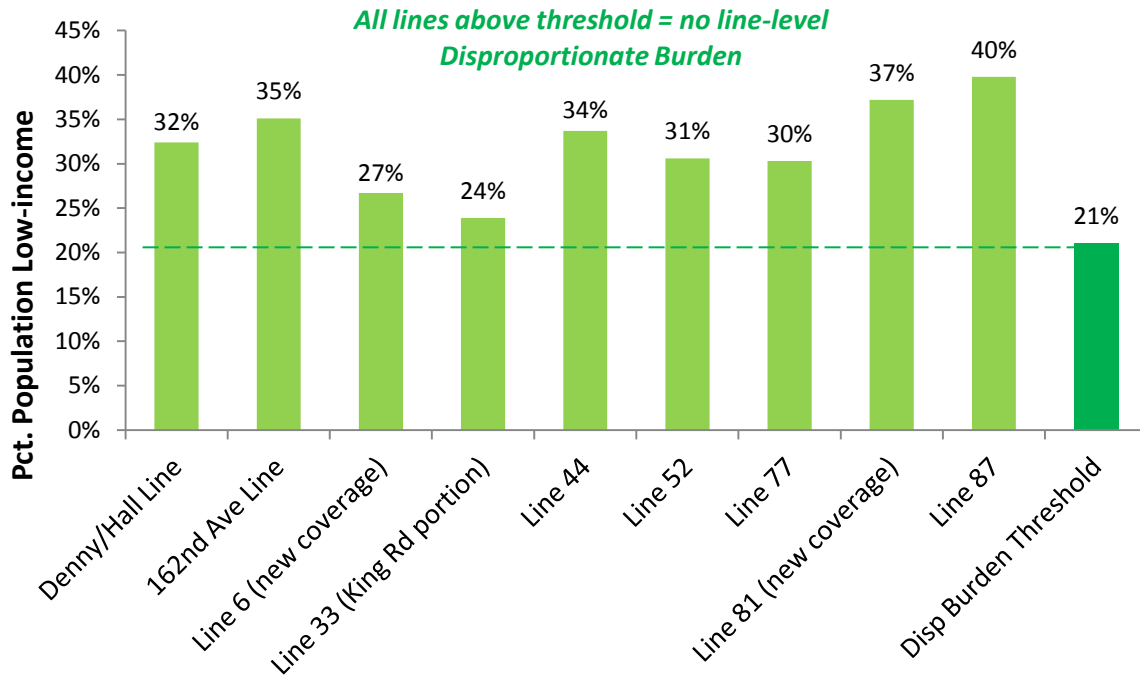


Source: 2010-2014 American Community Survey, block group level

⁴ Access is defined as within ¼ mile of a stop on the line. For full details of access to services by line, see Attachment B.

⁵ The Line 152 is shown separately for clarity.

Figure 7: Low-income Population Comparison
 Lines with proposed Major Service Increases & Disproportionate Burden
 Threshold



Source: 2010-2014 American Community Survey, block group level. Low-income defined as at or below 150% federal poverty level.

➤ **Denney/Hall Line (New bus line)**

The proposed routing for this line would potentially benefit a service area population that is **33% minority** and **32% low-income** which are both well above the Disparate Impact (25%) and Disproportionate Burden (21%) thresholds for Major Service Increases. Thus, there is **no Disparate Impact** and **no Disproportionate Burden** at the line-level.

In terms of access, this line would provide new service to:

- About 31,000 jobs
 - 64% are low-to-medium wage jobs, which is much greater than the TriMet district average
 - 12% are jobs held by people of color, which is slightly lower than the TriMet district average
 - 9% are jobs held by Hispanic/Latino workers, which is slightly greater than the TriMet district average
- 1 employment resource center
- 1 high school
- 1 alternative/trade high school
- 3 community health care service centers
- 11 grocery stores and supermarkets, including several Asian and Hispanic grocers

➤ **E 162nd Ave Line** (New bus line)

The proposed routing for this line would potentially benefit a service area population that is **38% minority** and **35% low-income**, which are both well above the Disparate Impact (25%) and Disproportionate Burden (21%) thresholds for Major Service Increases. Thus, there is **no Disparate Impact** and **no Disproportionate Burden** at the line-level.

In terms of access, this line would provide new service to:

- Over 7,600 jobs
 - 61% are low-to-medium wage jobs, which is greater than the TriMet district average
 - 13% are jobs held by people of color, which is similar to the TriMet district
 - 9% are jobs held by Hispanic/Latino workers, which is slightly greater than the TriMet district average
- 3 grocery stores/supermarkets, two of which are Hispanic grocers

➤ **Line 6** (Route change)

The new area that would be served by this route change has a population that is **46% minority** and **27% low-income**, both of which exceed the Disparate Impact (25%) and Disproportionate Burden (21%) thresholds for Major Service Increases. Thus, there is **no Disparate Impact** and **no Disproportionate Burden** at the line-level.

In terms of access, this change would provide new service to:

- About 1,000 jobs
 - 80% are low-to-medium wage jobs, which is much greater than the TriMet district average
 - 12% are jobs held by people of color, which is slightly lower than the TriMet district average
 - 8% are jobs held by Hispanic/Latino workers, which is similar to the TriMet district average
- 2 grocery stores/supermarkets

➤ **Line 33** (Weekend frequency increase)⁶

This service increase would potentially benefit a service area population that is **24% minority**, which is below the Disparate Impact threshold (25%) for Major Service Increases. This indicates a **potential Disparate Impact**, calling for further examination, in particular the considerations below as well as the system-level analysis provided in the next section. The service area population is **24% low-income**, which is above the Disproportionate Burden threshold (21%) for Major Service Increases. Thus, there is **no Disproportionate Burden** at the line-level.

In terms of access, this increase would improve service to:

- About 17,000 jobs

⁶ Line 33 service increase applies only to the King Rd portion of the route so demographic data reflects only the King Rd portion.

- 72% are low- to-medium wage jobs, which is much greater than the TriMet district average
- 12% are jobs held by people of color, which is slightly lower than the TriMet district average
- 9% are jobs held by Hispanic/Latino workers, which is slightly greater than the TriMet district average
- 2 employment resource centers
- 1 high school
- 3 community health care service centers
- 4 grocery stores/supermarkets

➤ **Line 44** (*Weekday frequency increase*)⁷

This service increase would potentially benefit a service area population that is **30% minority** and **34% low-income**, both of which exceed the Disparate Impact (25%) and Disproportionate Burden (21%) thresholds for Major Service Increases. Thus, there is ***no Disparate Impact*** and ***no Disproportionate Burden*** at the line-level.

In terms of access, this increase would improve service to:

- About 78,000 jobs
 - 47% are low-to-medium wage jobs, which is lower than the TriMet district average
 - 13% are jobs held by people of color, which is similar to the TriMet district average
 - 6% are jobs held by Hispanic/Latino workers, which is lower than the TriMet district average
- 5 employment resource centers
- 1 high school
- 1 community college
- 1 educational service provider
- 13 community health care service centers
- 4 grocery stores/supermarkets

➤ **Line 52** (*Weekend frequency increase*)

This service increase would potentially benefit a service area population that is **43% minority** and **31% low-income**, both of which exceed the Disparate Impact and Disproportionate Burden thresholds for Major Service Increases. Thus, there is ***no Disparate Impact*** and ***no Disproportionate Burden*** at the line-level.

In terms of access, this increase would improve service to:

- About 29,000 jobs
 - 58% are low-to-medium wage jobs, which is greater than the TriMet district average
 - 15% are jobs held by people of color, which is greater than the TriMet district average

⁷ Line 44 service increase applies only to the portion of the route between downtown Portland and St. Johns, so demographic data reflects only that portion.

- 9% are jobs held by Hispanic/Latino workers, which is slightly greater than the TriMet district average
- 3 employment resource centers
- 2 community college campuses
- 5 high schools
- 1 Expeditionary Learning school
- 1 educational service center
- 5 community health care service centers
- 13 grocery stores/supermarkets, including one Hispanic, one Halal, and several Asian grocers

➤ **Line 77 (Weekday frequency increase)**

This service increase would potentially benefit a service area population that is **30% minority** and **30% low-income**, both of which exceed the Disparate Impact and Disproportionate Burden thresholds for Major Service Increases. Thus, there is **no Disparate Impact** and **no Disproportionate Burden** at the line-level.

In terms of access, this increase would improve service to:

- About 106,000 jobs
 - 52% are low-to-medium wage jobs, which is slightly lower than the TriMet district average
 - 13% are jobs held by people of color, which is similar to the TriMet district average
 - 7% are jobs held by Hispanic/Latino workers, which is slightly lower than the TriMet district average
- 4 employment resource centers
- 1 high school
- 1 alternative high school
- 3 educational service centers
- 8 community health care service centers
- 19 grocery stores/supermarkets

➤ **Line 81 (Route change)**

The new area that would be served by this route change has a population that is **27% minority** and **37% low-income**, both of which exceed the Disparate Impact (25%) and Disproportionate Burden (21%) thresholds for Major Service Increases. Thus, there is **no Disparate Impact** and **no Disproportionate Burden** at the line-level.

In terms of access, this increase would provide new service to:

- About 4,400 jobs
 - 71% are low-to-medium wage jobs, which is much greater than the TriMet district average
 - 12% are jobs held by people of color, which is slightly lower than the TriMet district average
 - 8% are jobs held by Hispanic/Latino workers, which is similar to the TriMet district average
- 1 grocery store/supermarket

➤ **Line 87** (New weekend service, frequency increase)⁸

This service increase would potentially benefit a service area population that is **43% minority** and **40% low-income**, both of which exceed the Disparate Impact and Disproportionate Burden thresholds for Major Service Increases. Thus, there is **no Disparate Impact** and **no Disproportionate Burden** at the line-level.

In terms of access, this increase would improve service to:

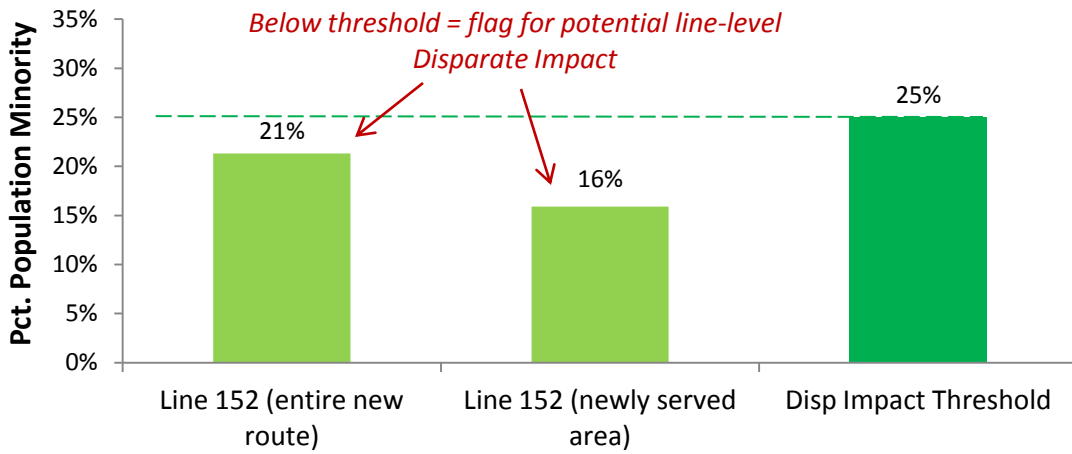
- About 35,000 jobs
 - 58% are low-to-medium wage jobs, which is greater than the TriMet district average
 - 14% are jobs held by people of color, which is slightly greater than the TriMet district average
 - 9% are jobs held by Hispanic/Latino workers, which is slightly greater than the TriMet district average
- 5 employment resource centers
- 1 high school
- 1 community college campus
- 1 educational service provider
- 3 community health care centers
- 8 grocery stores/supermarkets, including 1 Asian and 2 Hispanic grocers

➤ **Line 152** (Route change and frequency increase)

The Line 152 proposal includes both a route change that will serve a new area and a frequency increase on the entire new line. As shown in Figure 8, the entire new line has a population that is **21% minority**, while the area that would be newly served by the route change to the Line 152 has a population that is **16% minority**. Both of these are below the Disparate Impact threshold for Major Service Increases (25%).

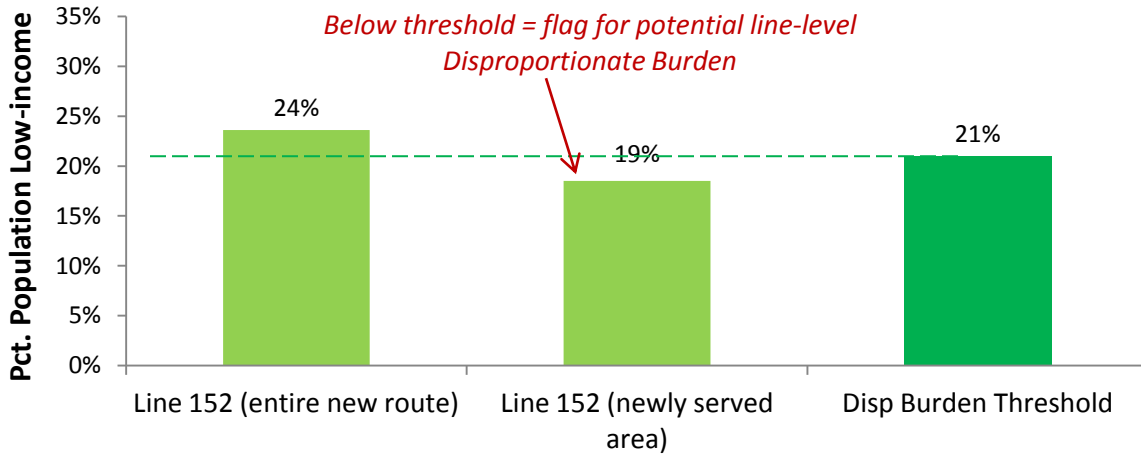
⁸ Line 87 service increases apply only to the portion of the route between Gateway Transit Center and SE Powell Blvd, which would be split from the rest of the route as discussed in the “Other Major Service Changes” section.

Figure 8: Minority Population Comparison
 Line 152 Increases & Disparate Impact Threshold



Source: 2010-2014 American Community Survey, block group level

Figure 9: Low-income Population Comparison
 Line 152 Increases & Disproportionate Burden Threshold



Source: 2010-2014 American Community Survey, block group level. Low-income defined as at or below 150% federal poverty level.

As shown in Figure 9, the entire new line has a population that is **24% low-income**, which is above the Disproportionate Burden threshold for Major Service Increases (21%). On the other hand, the area that would be newly served by the route change to the Line 152 has a population that is **19% low-income**, which is below the 21% Disproportionate Burden threshold.

Thus, there is a **potential Disparate Impact** related to both the route change and the frequency increase, and a **potential Disproportionate Burden** related to the route change, calling for further examination, in particular the considerations below as well as the system-level analysis provided in the next section.

In terms of access, the route change would provide new service to:

- About 400 jobs
 - 67% are low-to-medium wage jobs, which is greater than the TriMet district average
 - 5% are jobs held by people of color, which is much lower than the TriMet district average
 - 5% are jobs held by Hispanic/Latino workers, which is lower than the TriMet district average
- 1 community college campus
- 2 high schools

The frequency increase would improve service to:

- About 18,000 jobs
 - 65% are low-to-medium wage jobs, which is greater than the TriMet district average
 - 12% are jobs held by people of color, which is slightly lower than the TriMet district average
 - 8% are jobs held by Hispanic/Latino workers, which is similar to the TriMet district average
- 2 employment resource centers
- 1 community health service center
- 1 grocery store/supermarket

3. Other Major Service Changes

Two final proposed changes, while qualifying as a Major Service Changes, do not necessarily increase or reduce service. Evaluating potential distribution of adverse effects or benefits of the changes is not applicable, and therefore there is ***no potential Disparate Impact*** and ***no potential Disproportionate Burden*** under TriMet's Title VI policies. Even so, TriMet still analyzed the details of the proposed changes for potential equity impacts.

➤ **Line 87 (Line split)**

The Line 87 is proposed to be split into two lines at SE Powell & 182nd. The portion that currently runs between there and Gateway Transit Center is proposed for two increases in service: addition of weekend service and the extension of all trips to SE Powell & 182nd⁹. The other segment – between SE Powell and Gresham Transit Center – travels largely through residential neighborhoods and does not currently have the demand to warrant the same increase. This portion would be combined with a segment of the current Line 81 that travels along E Powell Blvd, SE Powell Valley Rd, and SE Kane Dr.

As discussed previously, and shown again in Figures 10 and 11, the service area of the Line 87-181st/Airport Way portion (proposed for service increases) has a **43% minority** population and **40% low-income** population – both well above average for the TriMet district.

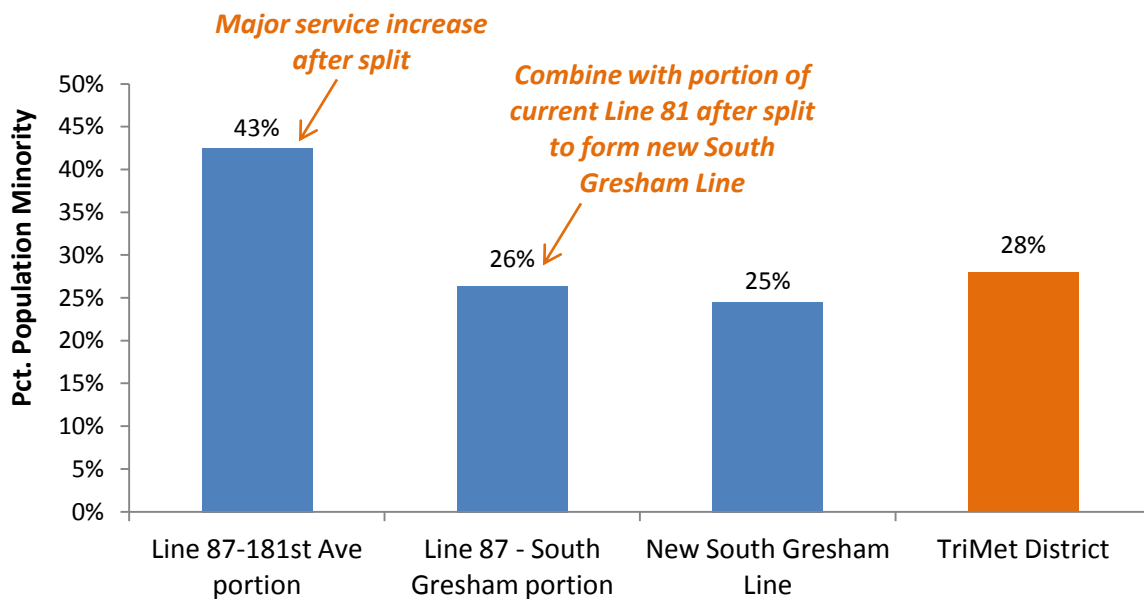
⁹ Currently several trips only operate for a portion of the entire route.

➤ **South Gresham Line** (New line created from portions of current Lines 81 and 87)¹⁰

The route change to the Line 81 would remove Line 81 service from a total of 31 stops, including both directions of service. With the exception of the stop pair at Kane & 8th, all of these stops would be served by a new South Gresham line, created by combining the southern portion of the Line 87 (discussed previously) with the segment of the current Line 81 to be removed. The stop pair at Kane & 8th is about one-tenth of a mile away from the nearest stops on the new Line 81. Additionally, all stops would continue to be served by Line 80, which has comparable service to the Line 81.

The service area of the new South Gresham line created by portions of the Line 87 and Line 81 has a population that is **25% minority**, which is lower than the 28% minority population for the TriMet District as a whole. The area also has a **28% low-income** population, which is higher than the TriMet District as a whole.

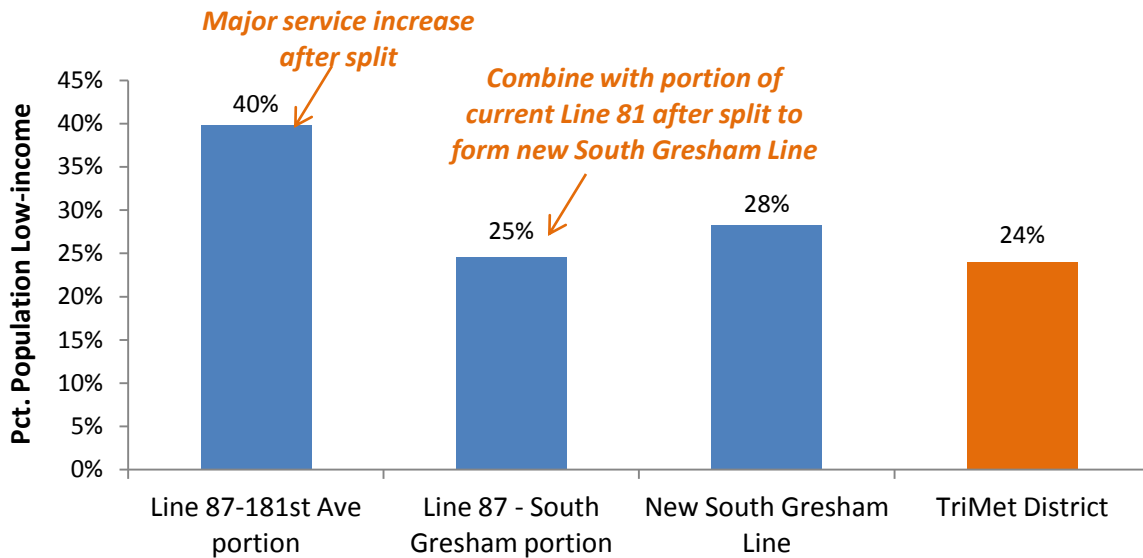
Figure 10: Minority Population Comparison
Proposed Line 87 Line Split & New South Gresham Line



Source: 2010-2014 American Community Survey, block group level

¹⁰ This section does not analyze the service increase component of the Line 81 or Line 87 changes. That analysis is provided in the previous section.

Figure 11: Low-income Population Comparison
Proposed Line 87 Line Split & New South Gresham Line



Source: 2010-2014 American Community Survey, block group level. Low-income defined as at or below 150% federal poverty level.

D. System-level Analysis

Because more than one line is proposed for a Major Service Change, a system-level analysis is required in addition to the line-level analysis. The system-level analysis aims to measure impacts of all Major Service Changes combined to determine how equitable the impacts would be across racial/ethnic and economic lines. Service increases and service reductions are analyzed separately in order to examine both potential system-level *adverse effects* and distribution of *benefits*.

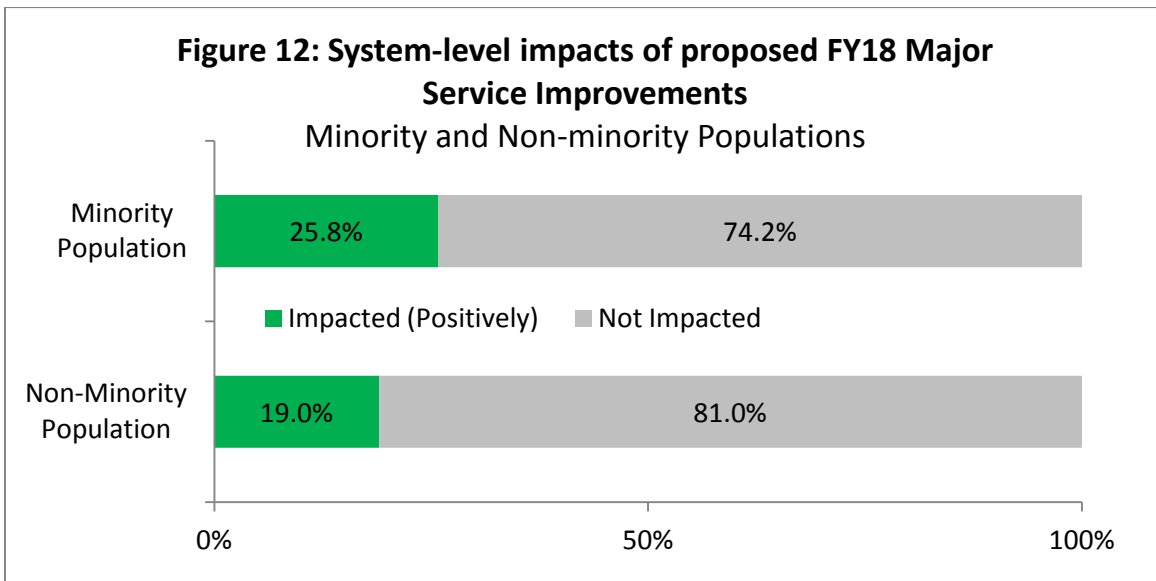
➤ **System-level Disparate Impact Analysis: Major Service Increases**

The system-level Disparate Impact analysis of Major Service Increases is completed by determining what portion of the TriMet District’s minority population stands to benefit from the Major Service Change improvements, and comparing that to the portion of the District’s non-minority population that potentially benefits. A potential Disparate Impact would exist if minority populations benefitted substantially less than non-minority populations. The way we measure this is to test whether 20% less (or 4/5) of the District’s minority than non-minority population stood to benefit from the improvements.

Table 4 and Figure 12 compare the positively impacted minority and non-minority populations. A greater percentage of the District’s minority population stands to benefit from the proposed Major Service Increases as compared to the non-minority population (26% vs. 19%, respectively). Therefore, ***no system-level Disparate Impact is found related to proposed Major Service Increases.***

Table 4: System-level Disparate Impact Analysis of Major Service Increases

Pct. of TriMet District Non-Minority Pop Positively Impacted	Minority Pop Disparate Impact Threshold	Pct. of TriMet District Minority Pop Positively Impacted	Potential Disparate Impact?
19%	Less than 15%	26%	No



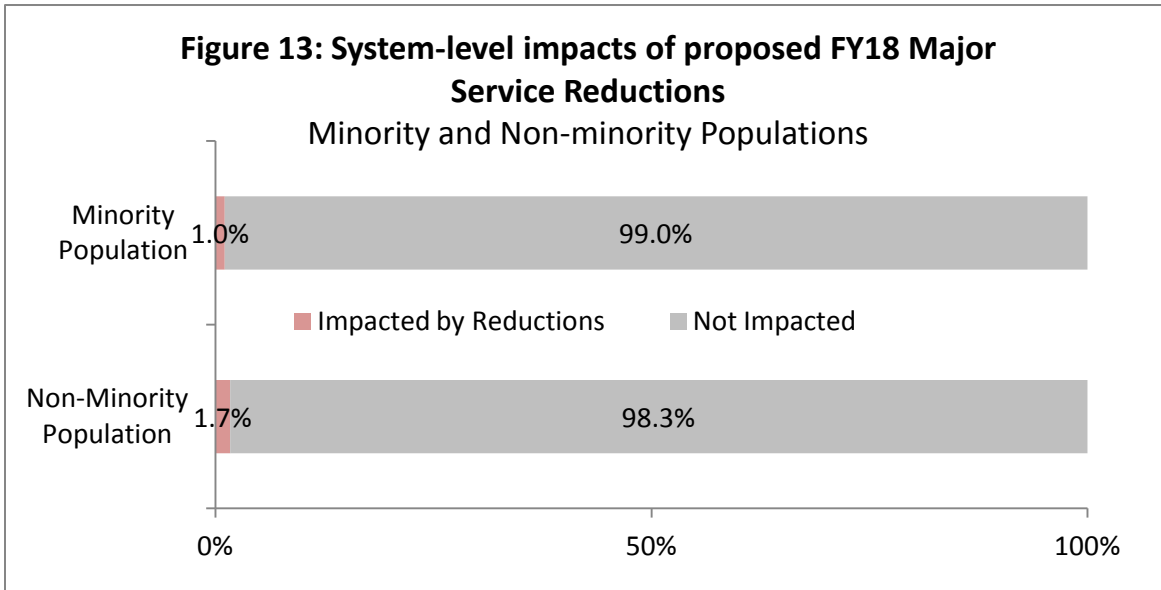
➤ **System-level Disparate Impact Analysis: Major Service Reductions**

The system-level Disparate Impact analysis of Major Service Reductions is completed by determining what proportion of the TriMet District’s minority population is potentially adversely impacted from the service reductions and comparing that to the District’s non-minority population that may be adversely impacted. A potential Disparate Impact would exist if minority populations were impacted substantially more by service reductions than non-minority populations. The way we measure this is to test whether 20% more of the District’s minority than non-minority population were impacted by the service reductions.

Table 5 and Figure 13 compare the impacted minority and non-minority populations. A greater percentage of the District’s non-minority population is potentially impacted by the proposed Major Service Reductions as compared to the minority population (1.7% vs. 1.0%, respectively). Therefore, **no system-level Disparate Impact is found related to proposed Major Service Reductions.**

Table 5: System-level Disparate Impact Analysis of Major Service Reductions

Pct. of TriMet District Non-Minority Pop Impacted	Minority Pop Disparate Impact Threshold	Pct. of TriMet District Minority Pop Impacted	Potential Disparate Impact?
1.7%	Greater than 2%	1.0%	No



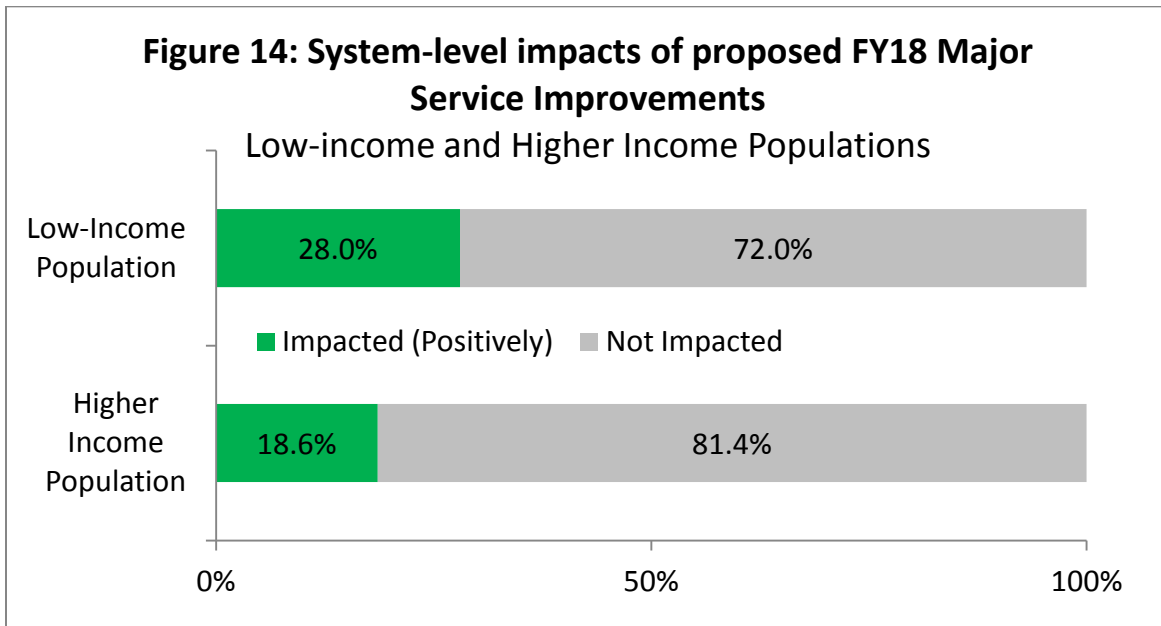
➤ **System-level Disproportionate Burden Analysis: Major Service Increases**

The system-level Disproportionate Burden analysis is completed by determining what proportion of the TriMet District’s low-income population is positively impacted by the Major Service Increases, and comparing that to the District’s higher income population that is positively impacted. “Higher income” includes all persons above the low-income threshold of 150% of the federal poverty level. A potential Disproportionate Burden would exist if low-income populations benefitted substantially less than higher income populations. The way we measure this is to test whether 20% less (or 4/5) of the District’s low-income than higher income population stands to benefit from the improvements.

Table 6 and Figure 14 compare the impacted low-income and higher income populations. A greater percentage of the District’s low-income population stands to benefit from the proposed Major Service Increases as compared to the higher income population (28% vs. 19%, respectively). Therefore, **no system-level Disproportionate Burden is found related to proposed Major Service Increases.**

Table 6: System-level Disproportionate Burden Analysis of Major Service Increases

Pct. of TriMet District Higher Income Pop Positively Impacted	Low-income Pop Disproportionate Burden Threshold	Pct. of TriMet District Low-income Pop Positively Impacted	Potential Disproportionate Burden?
19%	Less than 15%	28%	No



➤ **System-level Disproportionate Burden Analysis: Major Service Reductions**

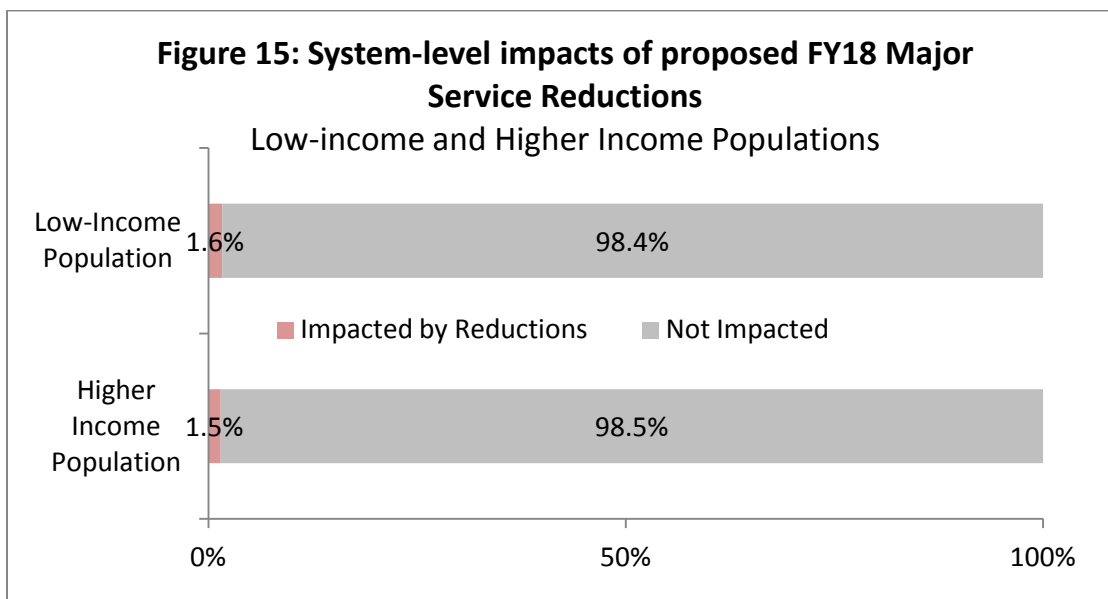
The system-level Disproportionate Burden analysis is completed by determining what proportion of the TriMet District’s low-income population is potentially adversely impacted from the service reductions and comparing that to the District’s higher income population that may be adversely impacted. “Higher income” includes all persons above the low-income threshold of 150% of the federal poverty level. A potential Disproportionate Burden would exist if low-income populations were impacted substantially more by service reductions than higher income populations. The way we measure this is to test whether 20% more of the District’s low-income than higher income population were impacted by the service reductions.

Table 7 and Figure 15 compare the impacted low-income and higher income populations. A slightly greater percentage of the District’s low-income population is potentially impacted by the proposed Major Service Reductions as compared to the higher income population (1.6% vs. 1.5%, respectively). However, the difference does not meet the Disproportionate Burden threshold of 20%: given the 1.5% of the higher income population impacted by the reductions, the percentage of the low-income population impacted would have to be at least 1.8% to meet the definition of a system-level Disproportionate

Burden. Therefore, *no system-level Disproportionate Burden is found related to proposed Major Service Reductions.*

Table 7: System-level Disproportionate Burden Analysis of Major Service Reductions

Pct. of TriMet District Higher Income Pop Impacted	Low-income Pop Disproportionate Burden Threshold	Pct. of TriMet District Low-income Pop Impacted	Potential Disproportionate Burden?
1.5%	Greater than 1.8%	1.6%	No



IV. Community Engagement

The service proposals analyzed in this report stem from a multi-year planning and outreach process to develop a vision for future transit service in the Portland metropolitan region. Divided by sub-region of the TriMet service district, these “Service Enhancement Plans” were undertaken to identify and prioritize opportunities to improve bus service as well as pedestrian and bike access to transit, given current and projected population and job growth. These are long-range plans which include dozens of bus service improvements beyond those proposed for implementation over the next year. ¹¹

An initial FY18 service plan was developed in fall 2016, at which point TriMet posted the proposed changes on trimet.org to solicit feedback, placed advertisements in newspapers across the service district, conducted on-board outreach and sent postcards to nearby residents of lines with proposed routing changes, presented

¹¹ For more information, go to <http://future.trimet.org>

the proposal to the Transit Equity Advisory Committee, and sent emails to riders and other stakeholders. Based on feedback received, TriMet modified the plan by:

1. Adding the proposed new line on E 162nd Ave, and
2. Extending the new line south of Powell Blvd created from the Line 87 split to serve much of the current Line 81 route south and east of Gresham Transit Center, as well as the WinCo and Fred Meyer on SE 1st St.

For the second phase of outreach, the updated plan was posted to trimet.org and many elements of the initial outreach phase were repeated (postcards, newspaper advertisements, emails, etc). TriMet held an open house on February 28, 2017 in downtown Portland and several staff attended a meeting of the Rosewood Initiative in East Portland on March 16, 2017 to solicit feedback about the updated proposal. Finally, TriMet held a public hearing at its March 22, 2017 board meeting to receive comments on the proposed service changes.

Responses overall were positive about the proposal. The following is a summary of themes across the feedback received:

- Strong community support for the proposed new line on E 162nd Ave.
- Advocacy for more service than currently proposed on the E 162nd Ave line, specifically weekend service and greater frequency.
- Strong community support for the proposed new Denney/Hall line.
- Support from Clackamas Community College students and staff for the proposed routing changes to the Line 152.
- Support from the City of Troutdale for the proposed routing changes to the Line 81.

V. Summary of Findings

Table 9 on the next page summarizes the results of the line-level and system-level Disparate Impact and Disproportionate Burden analyses. As shown, Title VI concerns are minimal with the proposed FY18 Annual Service Plan. The proposal promises to improve service significantly for minority and low-income populations, with only two improvements (to the Lines 33 and 152) serving areas with relatively low minority populations. The Line 152 improvement also serves a relatively low proportion of low-income households as compared to the TriMet district. However, improving service on these lines does not raise concerns of an inequitable distribution of benefits given a) the results of the system-level analysis, and b) that the other 8 lines proposed for improvements did not have any line-level Disparate Impacts or Disproportionate Burdens.

The one proposed service reduction (to the Line 152) also does not appear to create disproportionate and adverse effects given the low concentrations of minority and low-income populations potentially impacted.

Table 9: Summary of Disparate Impact and Disproportionate Burden analysis results

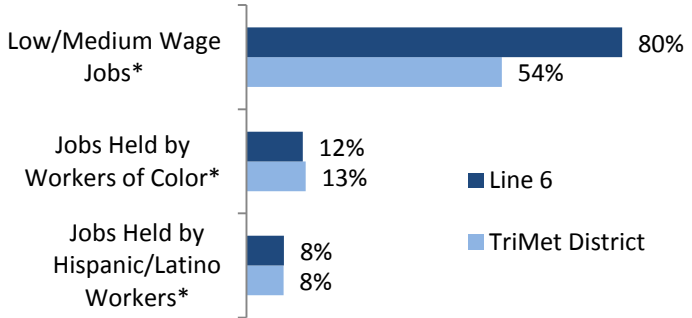
		Potential Disparate Impact?	Potential Disproportionate Burden?
Major Service Reduction	152-Milwaukie	No	No
Major Service Increases	Denney/Hall Line (New)	No	No
	E 162 nd Ave Line (New)	No	No
	6-Martin Luther King Jr Blvd	No	No
	33-McLoughlin/King Rd	Yes	No
	44-Capitol Hwy/Mocks Crest	No	No
	52-Farmington/185 th	No	No
	77-Broadway/Halsey	No	No
	81-Kane/257 th	No	No
	87-Airport Way/181 st	No	No
	152-Milwaukie	Yes	Yes
<i>Combined Improvements (System-level)</i>	No	No	
Other Major Service Changes	87-Airport Way/181 st	No	No
	<i>South Gresham Line (New)</i>	No	No

**Attachment A: Analysis of impact on access to employment, education, health care,
and food for minority and low-income populations**

Line 6-Martin Luther King Jr Blvd

Route change to serve Delta Park retail center

Creates new access Improves access Removes access Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets
<p>• <u>Creates new access</u> to an estimated 961 jobs</p>  <p><i>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.</i></p>	N/A	N/A	N/A	<ul style="list-style-type: none"> • Wal-Mart • Cash & Carry

Line 33-McLoughlin/King Rd

Upgrade service on King Rd to frequent service (affects weekends only)

Creates new access
 Improves access
 Removes access
 Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
<p> • Improves access to an estimated 17,056 jobs </p> <table border="1" style="margin-top: 10px;"> <caption>Job Access Comparison</caption> <thead> <tr> <th>Category</th> <th>Line 33 (%)</th> <th>TriMet District (%)</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>72%</td> <td>54%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>12%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>9%</td> <td>8%</td> </tr> </tbody> </table> <p> <small>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau. Source: US Census Bureau.</small> </p>	Category	Line 33 (%)	TriMet District (%)	Low/Medium Wage Jobs*	72%	54%	Jobs Held by Workers of Color*	12%	13%	Jobs Held by Hispanic/Latino Workers*	9%	8%	<ul style="list-style-type: none"> • LDS Employment Resource Services • Northwest Family Services 	<ul style="list-style-type: none"> • Clackamas Middle College 	<ul style="list-style-type: none"> • Clackamas County Behavioral Health Centerstone Clinic • Neighborhood Health Center Milwaukie • Sunnyside Health and Wellness Center 	<ul style="list-style-type: none"> • Albertsons • Safeway • Natural Grocers • Winco
Category	Line 33 (%)	TriMet District (%)														
Low/Medium Wage Jobs*	72%	54%														
Jobs Held by Workers of Color*	12%	13%														
Jobs Held by Hispanic/Latino Workers*	9%	8%														

Line 44-Capitol Hwy/Mocks Crest

Added midday frequency between downtown Portland and St. Johns

Creates new access
 Improves access
 Removes access
 Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
<p>• Improves access to an estimated 77,867 jobs</p> <table border="1" style="margin-top: 10px;"> <caption>Job Access Comparison</caption> <thead> <tr> <th>Category</th> <th>Line 44 (%)</th> <th>TriMet District (%)</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>47%</td> <td>54%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>13%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>6%</td> <td>8%</td> </tr> </tbody> </table> <p><small>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau. Source: US Census Bureau.</small></p>	Category	Line 44 (%)	TriMet District (%)	Low/Medium Wage Jobs*	47%	54%	Jobs Held by Workers of Color*	13%	13%	Jobs Held by Hispanic/Latino Workers*	6%	8%	<ul style="list-style-type: none"> • Job Corps Outreach, Admission, & Placement • New Avenues for Youth • Oregon State Worksource Center Portland Metro Central • Portland Development Commission • Urban League 	<ul style="list-style-type: none"> • Jefferson High School • Oregon Council for Hispanic Advancement • PCC Cascade 	<ul style="list-style-type: none"> • Bud Clark Acute Care Clinic • Cascadia BHC Garlington Center • Central City Concern Old Town Clinic • Central City Concern Old Town Recovery Center • Children's Community Clinic • Jefferson High School Health Clinic • Multnomah County Mental Health & Addiction Svcs • Multnomah County NE Health &Dental Clinic • Multnomah County N Portland Health & Dental Clinic • NARA Indian Health Clinic • NUNM Hooper Detox • OHSU Avel Gordly Center for Healing • Oregon College of Oriental Medicine Clinic 	<ul style="list-style-type: none"> • McCormick Pier Grocery & Deli • New Seasons (2 locations) • Safeway • World Foods
Category	Line 44 (%)	TriMet District (%)														
Low/Medium Wage Jobs*	47%	54%														
Jobs Held by Workers of Color*	13%	13%														
Jobs Held by Hispanic/Latino Workers*	6%	8%														

Line 52-Farmington/185th

Added frequency on Saturdays and Sundays

Creates new access
 Improves access
 Removes access
 Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
<p>• Improves access to an estimated 29,363 jobs</p> <table border="1" style="margin-top: 10px;"> <caption>Job Access Comparison</caption> <thead> <tr> <th>Category</th> <th>Line 52 (%)</th> <th>TriMet District (%)</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>58%</td> <td>54%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>15%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>9%</td> <td>8%</td> </tr> </tbody> </table> <p><small>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.</small></p>	Category	Line 52 (%)	TriMet District (%)	Low/Medium Wage Jobs*	58%	54%	Jobs Held by Workers of Color*	15%	13%	Jobs Held by Hispanic/Latino Workers*	9%	8%	<ul style="list-style-type: none"> • Goodwill Industries Aloha • Oregon State Worksource Center in Beaverton/Hillsboro • PCC Rock Creek 	<ul style="list-style-type: none"> • Aloha HS • Beaverton Health & Science School • Beaverton HS • Jesuit HS • PCC Rock Creek • PCC Willow Creek • Sylvan Learning Center • Valley Catholic HS • Westview HS 	<ul style="list-style-type: none"> • Beaverton HS Health Clinic • Lifeworks NW • Neighborhood Health Center Beaverton • NUNM Beaverton Clinic • Washington County HHS Beaverton Clinic 	<ul style="list-style-type: none"> • Albertsons (2 locations) • Aloha Halal Market • Asian Food Center • Bales Marketplace • Can Tho Market • Fred Meyer • Grocery Outlet • Natural Grocers • Nuevo Horizonte Market • Safeway • Trader Joes (2 locations) • U-Need Asian Market • Viet & Thai Food Market
Category	Line 52 (%)	TriMet District (%)														
Low/Medium Wage Jobs*	58%	54%														
Jobs Held by Workers of Color*	15%	13%														
Jobs Held by Hispanic/Latino Workers*	9%	8%														

Line 77-Broadway/Halsey

Added frequency on weekdays

Creates new access
 Improves access
 Removes access
 Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
<p>• Improves access to an estimated 105,780 jobs</p> <table border="1" style="margin-top: 10px;"> <caption>Job Access Data</caption> <thead> <tr> <th>Category</th> <th>Line 77</th> <th>TriMet District</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>52%</td> <td>54%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>13%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>7%</td> <td>8%</td> </tr> </tbody> </table> <p><small>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.</small></p>	Category	Line 77	TriMet District	Low/Medium Wage Jobs*	52%	54%	Jobs Held by Workers of Color*	13%	13%	Jobs Held by Hispanic/Latino Workers*	7%	8%	<ul style="list-style-type: none"> • New Avenues for Youth • New Market Self Sufficiency Office • Northeast Self Sufficiency Office • PDC 	<ul style="list-style-type: none"> • Grant HS • New Avenues Alternative HS • Oregon Council for Hispanic Advancement • Reynolds Learning Center • Sylvan Learning Center 	<ul style="list-style-type: none"> • Bud Clark Acute Care Clinic • Central City Concern Old Town Clinic • Central City Concern Old Town Recovery Center • Grant HS School-based Health Clinic • Mult Co Mental Health & Addiction Svcs • NUNM Health Center(3 locations) • Oregon College of Oriental Medicine Clinic (2 locations) • Portland Adventist Community Svcs Health Clinic 	<ul style="list-style-type: none"> • Bi-Mart • Cash & Carry • Food Front Coop • Fred Meyer (3 locations) • Georgia's Grocery • Hollywood Grocery Outlet • Lovejoy Market • McCormick Pier Grocery & Deli • Natural Mart • New Day Market • New Seasons • Pacific Market • QFC • Safeway (3 locations) • Target • Trader Joes (2 locations) • Whole Foods • Winco • Zupan's
Category	Line 77	TriMet District														
Low/Medium Wage Jobs*	52%	54%														
Jobs Held by Workers of Color*	13%	13%														
Jobs Held by Hispanic/Latino Workers*	7%	8%														

Line 81-Kane/257th

Route changed to Division St. in Gresham

Creates new access
 Improves access
 Removes access
 Reduces access

	Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
NEW ACCESS	<ul style="list-style-type: none"> Creates new access to an estimated 4,403 jobs <p>Low/Medium Wage Jobs*</p> <table border="1"> <tr> <td>Line 81 new</td> <td>71%</td> </tr> <tr> <td>TriMet District</td> <td>54%</td> </tr> </table> <p>Jobs Held by Workers of Color*</p> <table border="1"> <tr> <td>Line 81 new</td> <td>12%</td> </tr> <tr> <td>TriMet District</td> <td>13%</td> </tr> </table> <p>Jobs Held by Hispanic/Latino Workers*</p> <table border="1"> <tr> <td>Line 81 new</td> <td>8%</td> </tr> <tr> <td>TriMet District</td> <td>8%</td> </tr> </table>	Line 81 new	71%	TriMet District	54%	Line 81 new	12%	TriMet District	13%	Line 81 new	8%	TriMet District	8%	N/A	N/A	N/A	<ul style="list-style-type: none"> Safeway
Line 81 new	71%																
TriMet District	54%																
Line 81 new	12%																
TriMet District	13%																
Line 81 new	8%																
TriMet District	8%																
REDUCED ACCESS	<ul style="list-style-type: none"> Reduces access to an estimated 3,704 jobs <p>Low/Medium Wage Jobs*</p> <table border="1"> <tr> <td>Line 81 removed</td> <td>75%</td> </tr> <tr> <td>TriMet District</td> <td>54%</td> </tr> </table> <p>Jobs Held by Workers of Color*</p> <table border="1"> <tr> <td>Line 81 removed</td> <td>11%</td> </tr> <tr> <td>TriMet District</td> <td>13%</td> </tr> </table> <p>Jobs Held by Hispanic/Latino Workers*</p> <table border="1"> <tr> <td>Line 81 removed</td> <td>9%</td> </tr> <tr> <td>TriMet District</td> <td>8%</td> </tr> </table>	Line 81 removed	75%	TriMet District	54%	Line 81 removed	11%	TriMet District	13%	Line 81 removed	9%	TriMet District	8%	N/A	N/A	N/A	<ul style="list-style-type: none"> Fred Meyer Wal-Mart Winco
Line 81 removed	75%																
TriMet District	54%																
Line 81 removed	11%																
TriMet District	13%																
Line 81 removed	9%																
TriMet District	8%																

**Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.*

Line 87-Airport Way/181st

New weekend service between Powell and Gateway TC.

Creates new access
 Improves access
 Removes access
 Reduces access

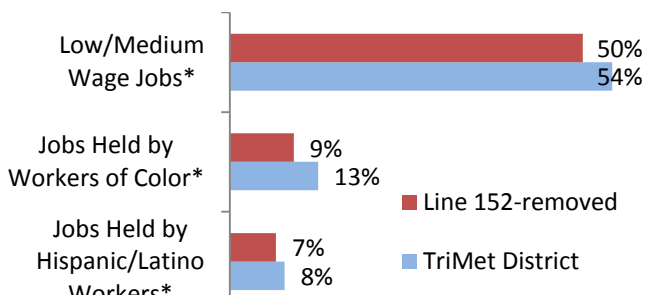
Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
<p>• <u>Improves</u> access to an estimated 34,764 jobs</p> <table border="1" style="margin-top: 10px;"> <caption>Employment Impact Comparison</caption> <thead> <tr> <th>Category</th> <th>Line 87</th> <th>TriMet District</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>58%</td> <td>54%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>14%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>9%</td> <td>8%</td> </tr> </tbody> </table> <p><small>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.</small></p>	Category	Line 87	TriMet District	Low/Medium Wage Jobs*	58%	54%	Jobs Held by Workers of Color*	14%	13%	Jobs Held by Hispanic/Latino Workers*	9%	8%	<ul style="list-style-type: none"> • Human Solutions Rockwood • Impact NW • IRCO • Portland Veterans Outreach Center • Vocational Rehabilitation 	<ul style="list-style-type: none"> • Centennial HS • IRCO Africa House • Mt Hood Community College Maywood 	<ul style="list-style-type: none"> • Centennial HS Health Clinic • Multnomah County Rockwood Health & Dental Clinic • Wallace Medical Concern Rockwood 	<ul style="list-style-type: none"> • Albertsons • Costco • Fred Meyer • Hong Phat Market • Safeway • Tienda Becerras • Tienda y Carniceria La Tapatia • Wal-Mart
Category	Line 87	TriMet District														
Low/Medium Wage Jobs*	58%	54%														
Jobs Held by Workers of Color*	14%	13%														
Jobs Held by Hispanic/Latino Workers*	9%	8%														

Line 152-Milwaukie

Route change to serve SE Harmony Rd. Frequency increased.

Creates new access Improves access Removes access Reduces access

	Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
NEW ACCESS	<ul style="list-style-type: none"> Creates new access to an estimated 386 jobs <table border="1"> <caption>Line 152-new vs TriMet District - New Access</caption> <thead> <tr> <th>Category</th> <th>Line 152-new</th> <th>TriMet District</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>67%</td> <td>54%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>5%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>5%</td> <td>8%</td> </tr> </tbody> </table>	Category	Line 152-new	TriMet District	Low/Medium Wage Jobs*	67%	54%	Jobs Held by Workers of Color*	5%	13%	Jobs Held by Hispanic/Latino Workers*	5%	8%	N/A	<ul style="list-style-type: none"> Clackamas Community College Harmony Campus Clackamas Middle College La Salle HS 	N/A	N/A
Category	Line 152-new	TriMet District															
Low/Medium Wage Jobs*	67%	54%															
Jobs Held by Workers of Color*	5%	13%															
Jobs Held by Hispanic/Latino Workers*	5%	8%															
IMPROVED ACCESS	<ul style="list-style-type: none"> Improves access to an estimated 18,075 jobs <table border="1"> <caption>Line 152-improved vs TriMet District - Improved Access</caption> <thead> <tr> <th>Category</th> <th>Line 152-improved</th> <th>TriMet District</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>65%</td> <td>54%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>12%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>8%</td> <td>8%</td> </tr> </tbody> </table>	Category	Line 152-improved	TriMet District	Low/Medium Wage Jobs*	65%	54%	Jobs Held by Workers of Color*	12%	13%	Jobs Held by Hispanic/Latino Workers*	8%	8%	<ul style="list-style-type: none"> Vocational Rehabilitation Exceed Enterprises 	N/A	<ul style="list-style-type: none"> Sunnyside Health & Wellness Center 	<ul style="list-style-type: none"> Albertsons
Category	Line 152-improved	TriMet District															
Low/Medium Wage Jobs*	65%	54%															
Jobs Held by Workers of Color*	12%	13%															
Jobs Held by Hispanic/Latino Workers*	8%	8%															

<p>REMOVED ACCESS</p>	<ul style="list-style-type: none"> Removes access to an estimated 4,701 jobs  <table border="1"> <thead> <tr> <th>Category</th> <th>Line 152-removed (%)</th> <th>TriMet District (%)</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>50%</td> <td>54%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>9%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>7%</td> <td>8%</td> </tr> </tbody> </table>	Category	Line 152-removed (%)	TriMet District (%)	Low/Medium Wage Jobs*	50%	54%	Jobs Held by Workers of Color*	9%	13%	Jobs Held by Hispanic/Latino Workers*	7%	8%	<p>N/A</p>	<ul style="list-style-type: none"> Sabin-Schellenberg Prof Technical Center 	<ul style="list-style-type: none"> Cascadia Clackamas Lake Road Clinic 	<p>N/A</p>
Category	Line 152-removed (%)	TriMet District (%)															
Low/Medium Wage Jobs*	50%	54%															
Jobs Held by Workers of Color*	9%	13%															
Jobs Held by Hispanic/Latino Workers*	7%	8%															

*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.

New Line - E 162nd Ave

New line on E 162nd Ave between the Columbia Corridor and SE Powell Blvd

Creates new access
 Improves access
 Removes access
 Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
<p>• <u>Creates new</u> access to an estimated 7,630 jobs</p> <table border="1" style="margin-top: 10px;"> <caption>Job Characteristics Comparison</caption> <thead> <tr> <th>Category</th> <th>162nd Ave Line</th> <th>TriMet District</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>61%</td> <td>54%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>13%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>9%</td> <td>8%</td> </tr> </tbody> </table> <p><small>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.</small></p>	Category	162nd Ave Line	TriMet District	Low/Medium Wage Jobs*	61%	54%	Jobs Held by Workers of Color*	13%	13%	Jobs Held by Hispanic/Latino Workers*	9%	8%	N/A	<ul style="list-style-type: none"> • Serendipity Center 	N/A	<ul style="list-style-type: none"> • Fred Meyer • Su Casa Supermercado • Tortilleria Y Tienda De Leons
Category	162nd Ave Line	TriMet District														
Low/Medium Wage Jobs*	61%	54%														
Jobs Held by Workers of Color*	13%	13%														
Jobs Held by Hispanic/Latino Workers*	9%	8%														

New Line - SW Denney/Hall

New line between Beaverton TC and Tigard TC

Creates new access
 Improves access
 Removes access
 Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
<p>• Creates new access to an estimated 30,986 jobs</p> <table border="1" style="margin-top: 10px;"> <caption>Job Access Comparison</caption> <thead> <tr> <th>Category</th> <th>Denny/Hall Line</th> <th>TriMet District</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>64%</td> <td>54%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>12%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>9%</td> <td>8%</td> </tr> </tbody> </table> <p><small>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.</small></p>	Category	Denny/Hall Line	TriMet District	Low/Medium Wage Jobs*	64%	54%	Jobs Held by Workers of Color*	12%	13%	Jobs Held by Hispanic/Latino Workers*	9%	8%	<ul style="list-style-type: none"> • Vocational Rehabilitation 	<ul style="list-style-type: none"> • Supafresh Youth Farm • Westside Christian HS 	<ul style="list-style-type: none"> • Asian Health & Service Center • Luke-Dorf West • NUNM Beaverton Clinic 	<ul style="list-style-type: none"> • Asian Food Center • Cash & Carry • Fred Meyer • G-Mart • Grocery Outlet • La Nortena • Natural Grocers • San Francisco Tienda Mexicana • Target • Trader Joes • Uwajimaya
Category	Denny/Hall Line	TriMet District														
Low/Medium Wage Jobs*	64%	54%														
Jobs Held by Workers of Color*	12%	13%														
Jobs Held by Hispanic/Latino Workers*	9%	8%														

Date: April 26, 2017

To: Board of Directors

From: Neil McFarlane *Neil McFarlane*

Subject: **ORDINANCE 345 OF THE TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET) ADOPTING SERVICE CHANGES, UPDATING ROUTE DESIGNATIONS, AND AMENDING TRIMET CODE CHAPTER 22 (SECOND READING)**

1. Purpose of Item

Ordinance 345 requests that the TriMet Board of Directors (Board) adopt service changes and update route designations contained in TriMet Code Chapter 22.

2. Type of Agenda Item

- Initial Contract
- Contract Modification
- Other: Ordinance

3. Reason for Board Action

The Board may adopt service changes and update TriMet Code route designations by ordinance. The TriMet Code may be amended only by adoption of an ordinance.

4. Type of Action

- Resolution
- Ordinance 1st Reading
- Ordinance 2nd Reading
- Other _____

5. Background

Ordinance 345 adopts service changes and updates route designations set forth in TriMet Code Chapter 22. The proposed service changes originate from the District’s Service Enhancement Plan (SEP) process addressing the agency’s 20-year vision for bus service improvements within the TriMet district and from public input before and after the initial proposed changes. The first reading of Ordinance 345 and a public hearing on the service changes occurred at the March 22, 2017, Board Meeting.

A. Proposed Service Changes:

Ordinance 345 includes bus service changes for fiscal year 2018. In this fiscal year, 5 bus lines will have trips added due to overloads, 4 bus lines will have increased weekday frequencies, 2 bus lines will have increased weekend frequencies or span, and all new

weekend service will be added to one bus line. There are 4 bus lines that will have a route change and 3 new bus lines will be added. One route designation will be changed in response to the City of Hillsboro's Connecting Hillsboro Address Project, where over 150 street names are being changed. The Line 47-Baseline/Evergreen will be changed to the Line 47-Main/Evergreen. The new changes will begin in September 2017 and March 2018.

Quarter	Line	Service Change
September 2017	6 Martin Luther King Jr. Blvd.	At Vancouver Way the bus will be routed to travel along Union to Hayden Meadows Drive and will have an improved connection to the Delta Park/Vanport MAX station. It will continue on to its current terminus at Jantzen Beach via Interstate 5.
	52 Farmington/185 th 44 Capitol Hwy/Mocks Crest and 77 Broadway/Halsey	Increased weekday midday frequency.
	33 McLoughlin/King Rd	Additional trips along King Road on Saturdays and Sundays that result in earlier and later service between Milwaukie and Clackamas Town Center.
	52 Farmington/185 th	Increased frequency on Saturdays and Sundays.
	4 Division/Fessenden 12 Barbur/Sandy and 15 Belmont/NW 23 rd	Added trip(s) for capacity.
March 2018	81 Kane Rd/257 th	Instead of service along Powell Valley Road, the bus will travel on Division Street to Kane/257 th and then continue north to Graham Rd. and onto NW Swigert Way to serve the Troutdale Reynolds Industrial Park.
	87 Airport Way/181 st 82 South Gresham (new line)	Split into two lines. The Line 87 will continue to run between Gateway Transit Center and 182 nd /Powell Blvd. All trips between Gateway Transit Center and SE 185th Ave./Rockwood will be extended to SE 182nd Ave. and Powell. The Line 87 will also have new weekend service added. The southern end of the current line 87 will be combined with the southern end of the line 81. This new line will run between 182 nd /Powell and the Gresham Transit Center and continue to Powell Valley Rd and Kane, where the 81 currently runs, and onto SE 1 st Street where it will serve the WinCo and Fred Meyer stores.

	152 Milwaukie	The route will no longer travel into the Milwaukie Marketplace, nor will it serve Lake Road or the Milwaukie Center. It will travel on International Way to Harmony Rd for more direct service to the International Way Industrial Center and Clackamas Community College Harmony Campus and Clackamas Town Center. This line will have increased weekday frequency as well. The Milwaukie Center will continue to be served by its own shuttle and LIFT.
	74 162 nd Ave (new line)	Service between Airport Way and Powell Blvd., continuing on Powell to SE 148 th to Division. This bus line will start as a weekday only route.
	42 Denney/Hall (new line)	Service between Beaverton Transit Center and Tigard Transit Center along Lombard, Denney, Scholls Ferry, Hall, and Pacific Highway into the Tigard Transit Center, with a deviation into Washington Square Transit Center along the way.
	17 Holgate Broadway 19 Woodstock/Glisan	Added trips for capacity.

The complete list of proposed Ordinance 345 service changes are set forth in Exhibit A.

B. Service Change Public Process

The proposed service changes are the result of numerous conversations and meetings with jurisdictions, businesses, customers, and community stakeholders. In addition to outreach activities conducted by TriMet service planners, advertisements regarding the proposed service changes were placed in newspapers across the district during two phases of outreach.

In November 2016, TriMet launched the initial feedback plan for the proposed service changes. TriMet sent postcards to residents around the lines proposed to change, posted signs at effected stops, published ads in community newspapers, rode buses to handout information, and sent emails to interested parties and riders. TriMet’s website solicited feedback about the proposed service changes (www.trimet.org/busplan).

In February 2017, TriMet used the feedback from the initial phase to update some of the proposed changes and then launched a second round of outreach including community newspaper ads, postcards, riding the buses to hand out information, and emails to interested parties.

On February 28, 2017, TriMet hosted an Open House at the Portland Building to provide information and solicit public comment on the revised proposal. Approximately 14 people attended the Open House and provided feedback. In addition, public comment on the proposed service changes is accepted by phone, email and standard mail. A summary of comments received via these avenues was provided to the Board. Opportunity for public testimony was provided during the March 22, 2017, Board meeting. There was testimony in favor of the planned changes, together with requests for more frequency on the new proposed Line 74 – 162nd Ave.

A summary of any comments received since the March 22, 2017, meeting will be provided to the Board prior to the April 26, 2017, Board meeting.

C. Title VI Transit Equity Analysis

In accordance with Federal Transit Administration (FTA) Title VI Circular 4702.IB implementing Title VI of the Civil Rights Act, major service changes must be analyzed to identify potential disproportionate impacts to minority and low-income populations. Ordinance 345 service changes include eleven major service changes.

TriMet staff prepared a Title VI service equity analysis (Report), which evaluated potential adverse effects and benefits associated with the proposed major service changes. To summarize, the Title VI concerns are minimal with the proposed service changes outlined in Ordinance 345. The proposed service changes improve service significantly for minority and low-income populations, with only two improvements (to the Lines 33 and 152) serving areas with relatively low minority populations. The Line 152 improvement also serves a relatively low proportion of low-income households as compared to the TriMet district. However, improving service on these lines does not raise concerns of an inequitable distribution of benefits given: a) the results of the system-level analysis; and b) that the other 8 lines proposed for improvements did not have any line-level Disparate Impacts or Disproportionate Burdens. The one proposed service reduction (to the Line 152) also does not appear to create disproportionate and adverse effects given the low concentrations of minority and low-income populations potentially impacted.

The results and findings of the Title VI service equity analysis were presented to the Board for their consideration at their February 22, 2017, meeting. The final Report with supplemental public feedback was provided to the Board prior to the April 27, 2017, meeting.

6. Financial/Budget Impact

Service changes proposed in Ordinance 345 will result in a FY2018 budget impact of approximately \$6.4 million, largely paid for by revenues generated by the 2016 payroll tax increase.

7. Impact if Not Approved

The Board may choose to not conduct a second reading and for Ordinance 345 at its April 26, 2017, meeting and not approve Ordinance 345. This option, however, is not recommended. The proposed service changes enable TriMet to continue to serve the growing region, provide expanded service, and maintain service capacity and reliability.

ORDINANCE NO. 345

ORDINANCE OF THE TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET) ADOPTING SERVICE CHANGES, UPDATING ROUTE DESIGNATIONS, AND AMENDING TRIMET CODE CHAPTER 22 (SECOND READING)

THE BOARD OF DIRECTORS OF THE TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET), pursuant to the authority of Oregon Revised Statutes Chapter 267, having considered the transit equity service change analysis Final Report, does hereby ordain and decree the following Ordinance:

Section 1- Adoption of Service Changes

Service Changes are adopted as set forth on the Attached Exhibit A, which is incorporated into and made part of this Ordinance. In accordance with TriMet Code Section 22.05, new Schedule Notices shall be filed for affected lines.

Section 2- Amendment of TriMet Code Chapter 22

TriMet Code Section 22.05 is amended to make the Route Designation updates set forth in attached Exhibit A.

Section 3- Effective/Operative Dates

This Ordinance shall take effect thirty days after the date of its adoption. Operative dates for specific Service Changes and Route Designation updates shall be as designated on Exhibit A.

Dated: April 26, 2017

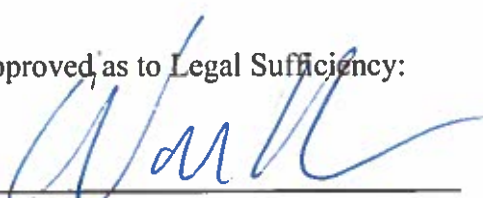


Presiding Officer

Attest:



Recording Secretary

Approved, as to Legal Sufficiency:


Legal Department

**ORDINANCE NO. 345
EXHIBIT A**

Service Changes and TriMet Code Chapter 22 Route Designation Updates

Service Changes are adopted and TriMet Code Chapter 22 Route Designations are updated as set forth below:

Section 1 – Service Changes

Affected Lines	Description
	<i>Operative September 3, 2017</i>
6 Martin Luther King Jr. Blvd.	Route change to include Hayden Meadows Drive
33 McLoughlin/King Rd	Trips added on Saturdays and Sundays between Milwaukie TC and Clackamas TC along King Rd. early and late to better match the McLoughlin corridor span of service.
44-Capitol Hwy/Mocks Crest	Trips added weekday midday on the portion of the line from downtown Portland to St. John's.
52 Farmington/185 th Ave.	Trips added weekday and weekend midday
77 Broadway/Halsey	Trips added weekday midday
	<i>Operative March 2018</i>
81 Kane Rd/257 th Ave.	Route change to Division, Kane, 25 th , Graham, Swigert.
87 Airport Way/181 st Ave.	Split into 2 routes. Line 87 will serve between Gateway TC, Airport Way, 181/182 nd to Powell Blvd. All trips between Gateway Transit Center and SE 185th Ave./Rockwood will be extended to SE 182nd Ave. & Powell. New Saturday and Sunday service will be added. New weekday only bus line will be created south of Powell.
152 Milwaukie	Route change International Way to Harmony Rd. No longer serving Milwaukie Marketplace, Milwaukie Center or Lake Road. Added weekday trips.
42 Denney/Hall	New line between Beaverton Transit Center and Tigard Transit Center via Lombard, Denney, Scholls Ferry Rd, Washington Square Transit Center, Hall Blvd, Pacific Hwy. and into Tigard Transit Center. Weekday service.

Affected Lines	Description
74 162 nd Ave.	New line on NE/SE 162 nd Ave between Airport Way and Powell Blvd., continuing on Powell to SE 148 th to SE Division. Weekday service.
82 South Gresham	New weekday line that takes the southern portions of both the line 87 and the line 81. Weekday service between SE 182 nd /Powell to Gresham TC and continuing on to Powell Valley Road and Kane to SE 1 st Street.

Section 2 – Route Designation Revisions to TriMet Code Chapter 22, Section 22.05

Operative September 3, 2017

Revise “47 Baseline/Evergreen” to “47 Main/Evergreen”

Operative March 2018:

Add “42 Denney/Hall”

Add “74 162nd Ave.”

Add “82 South Gresham”

Attachment J

Low-Income Fare Equity Analysis



Equity Analysis: Low Income Fare Program

Department of Diversity & Transit Equity

November 30, 2017

Executive Summary: Low Income Fare Program Equity Analysis

In accordance with Title VI of the Civil Rights Act of 1964, FTA Circular 4702.1B and TriMet's 2016 Title VI Program, TriMet conducts an equity analysis any time fare changes are proposed to ensure that changes do not unfairly impact people of color and low-income populations. The proposal to decrease Adult fares for eligible low-income riders in July 2018 calls for such an analysis prior to the TriMet Board of Directors taking action.

Methodology

TriMet's Title VI Program outlines the agency's Disparate Impact and Disproportionate Burden policies, as well as the way in which TriMet conducts fare equity analyses. In the case of the proposed Low Income Fare Program, the analysis aimed to answer two main questions: 1) **how might decreasing Adult fares for eligible riders impact minority and/or low-income riders; and 2) do minority and/or low-income riders stand to benefit equitably from this proposal?** To answer these questions, staff utilized data from the most recent TriMet fare survey, conducted onboard in fall 2016.

Findings

Disparate Impact Analysis (Minority Riders)

The analysis found that a greater percentage of minority riders would be positively affected (i.e., eligible trips) by the fare change than the percentage of minority riders on TriMet services as a whole. Eligible trips are defined as trips taken by low-income riders at or below the 200% federal poverty level. Additionally, minority and non-minority riders that are eligible for the Low Income Fare Program use different fare products (e.g. single fares, 1-day passes, and monthly passes) at similar rates.

- **Therefore, the proposal to decrease single fares, 1-day, and monthly passes by different percentages does not present a potential Disparate Impact.**

Disproportionate Burden Analysis (Low-income Riders)

The analysis found that the specific structure of the fare decrease proposal – to decrease Adult single fares by \$1.25, 1-day pass by \$2.50, and monthly passes by \$72 – will positively benefit low-income riders. The program eligibility requirement is inclusive of TriMet's definition of a low income rider. Thus, the program stands to benefit all low-income riders as defined by TriMet's Title VI policy. Additionally, low income and higher income riders use different fare products at similar rates – with the exception of the monthly pass which is proposed for the highest percentage decrease. However, fares paid by low-income riders are more likely to be the monthly/30-Day pass than fares paid by higher income riders.

- **Therefore, this proposal does not present a potential Disproportionate Burden on low-income riders, as low-income riders stand to benefit significantly from the program.**

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I. Background

TriMet is proposing a Low Income Fare Program for riders in households at or below 200 percent of the federal poverty level, enabling them to ride TriMet at a reduced rate. In 2016, the agency set out to identify new approaches to address transit affordability for low-income transit riders. Four key objectives guided the research, development, and feasibility of a Low Income Fare Program.

1. Sustainable: Funding is ongoing and costs are shared with regional partners;
2. Meaningful: Program is designed to address needs of low-income riders. Access should be convenient and easy for customers;
3. Targeted: Benefits directed to those that need them most, by way of established eligibility criteria; and
4. Manageable: Administering the program requires minimal cost and leverages existing agency agreements with nonprofits and community based organizations. Eligibility will be managed by organization(s) that have expertise in screening for income-based programs.

The proposed Low Income Fare Program required a process by which TriMet, alongside key regional stakeholders, worked collaboratively to develop recommendations that embodies these four tenets. Preliminary research on existing low income transit fare programs helped identify best practice approaches as well as their applicability to the Portland metro area. The research served as the basis for developing recommendations and parameters for a Low Income Fare Program. This program will help TriMet maintain and expand service to meet the transit needs of low-income populations in the TriMet District.

II. Authority

As a recipient of Federal financial assistance, TriMet must ensure that fare changes comply with Title VI of the Civil Rights Act of 1964, which states:

“No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

The FTA has provided specific implementing guidelines and regulations for complying with Title VI in Circular 4702.1B (“Circular”). Due to the interrelated nature of race/ethnicity and income, the Circular instructs transit agencies to also consider impacts on low-income populations as well as minority populations; the assessment of potential Title VI issues related to fare changes is completed through a fare equity analysis. Figure 1 shows the sequence of steps and considerations in the equity analysis process.

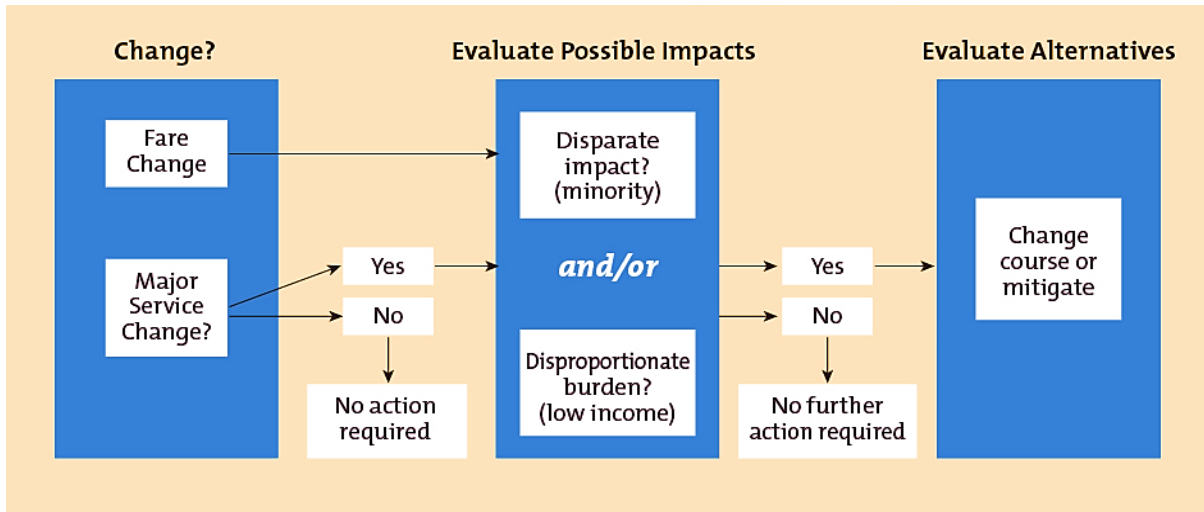


Figure 1: Overview of Title VI Equity Analysis

III. TriMet Title VI Compliance

In the fall of 2016, TriMet updated its Title VI Program, which received concurrence by the Federal Transit Administration (FTA) in 2017. The program outlines agency policies, definitions and procedures for complying with Title VI and performing equity analyses. This includes the agency’s fare change, Disparate Impact, and Disproportionate Burden policies.

A. Disparate Impact Policy

Testing for Disparate Impacts evaluates effects on minority riders or populations as compared to non-minority riders or populations. “Minority” is defined as all persons who identify as being part of racial/ethnic groups besides white, non-Hispanic.

Fare Changes

For fare changes, a potential Disparate Impact is noted when the percentage of trips by minority riders using a fare option, in combination with the percentage price change for that option, has an impact that exceeds the comparable impact on non-minority riders.

Differences in the use of fare options between minority populations and other populations include all such differences that are documented as statistically significant at the 95 percent confidence level.

B. Disproportionate Burden Policy

Testing for Disproportionate Burden evaluates potential effects on low-income populations. The analysis is similar to that used to determine potential Disparate Impacts, but comparing low-income – defined as at or below 150% of the federal poverty level – and higher income. Higher income includes all those above 150% of the federal poverty level.

IV. Proposed Fare Changes for Summer 2018

A. Description of Changes

TriMet is proposing a Low Income Fare Program, effective July 1, 2018. The current and proposed fares by fare type are shown in Table 1. The change would reduce the Single Fare and the 1-day Pass for eligible low income riders to half the price (50%) of Adult fare, and it reduces the Adult monthly pass by over 70%. After the decrease, Low Income fares would align with Honored Citizens and Youth fares.

In fiscal year 2016, low income riders (at or below the 200% of the Federal Poverty Level for the purposes of this program) took an estimated 27%¹ of TriMet system originating rides. The Low Income Fare Program will be a fare designation available to persons who are determined by TriMet to meet the eligibility requirements for a reduced fare because the person can appropriately document that their annual income is at or less than 200% of the federal poverty level (FPL). The FPL is the most commonly used criterion to determine eligibility and benefits for economic support programs at the federal, state and local level. The Census Bureau sets poverty thresholds annually using a nationally representative survey and then the Department of Health and Human Services (HHS) simplifies the thresholds to set federal poverty guidelines, with adjustments for family size. An estimated 31%² of the Tri-County population were at or below the 200% FPL in 2015.

Table 1: Proposed Low Income Fare Changes for Adult Fares

	Adult	
	Current Fare	Proposed Fare
Single Fare (cash/ticket)	\$2.50	\$1.25
1-day Pass	\$5.00	\$2.50
Monthly Pass	\$100.00	\$28.00

B. Data Sources

The 2016 TriMet on-board Fare Survey (survey instrument attached in Appendix A) collected fare payment and demographic data necessary to conduct a fare equity analysis consistent with the policies described in Section III of this report.

¹ Percent is based off an estimated calculation utilizing the 2016 Fare Survey and 2016 Ridership data. Data includes both weekday and weekend trips. The calculation was performed by Four Nines Technologies consulting firm as part of the fare cost modeling for the Low Income Fare Program.

² Ratio of income to Poverty Level in the Past 12 Months based off American Community Survey 2015 1-Year Estimates

C. Disparate Impact Analysis

The first level of the Disparate Impact analysis is a determination of how eligible trips compare to non-eligible trips in terms of racial/ethnic minority status within each group. Eligible riders are defined as those with a household income at or below 200 percent of the federal poverty level, which is a requirement for the Low Income Fare Program. The proportion of the TriMet service district’s population that minorities represent is 27.9%. As shown in Table 2, the share of program eligible trips taken by minority riders (66%) is significantly greater than non-eligible trips taken by minority riders (34%). The difference is similar on weekends. In other words, a greater percentage of minority riders would be positively affected (i.e., eligible trips) by the fare change than the percentage of minority riders on TriMet services as a whole. Conversely, a lower percentage of higher income minority riders would experience no impact by the proposed changes since fares would remain the same. This indicates that the proposal to decrease Adult fares for eligible income riders would not disproportionately impact minority riders.

Table 2: Comparison of Eligible and Non-eligible Trips, By Minority Status
TriMet 2016 Fare Survey

	Weekdays ¹		Weekends ¹	
	Minority Riders (n=1,439) ²	Non-Minority Riders (n=2,788)	Minority Riders (n=1,442)	Non-Minority Riders (n=2,530)
Eligible Trips	66%	48%	68%	53%
Non-eligible Trips	34%	52%	32%	47%
Total	100%	100%	100%	100%

¹ Differences between column pairs are statistically significant at the 95% confidence level

² n indicates weighted number of survey responses

Since different fares are proposed to decrease by different percentages, the next level of analysis examines the degree of decrease by fare type to see whether that leads to any potential disparities. Table 3 denotes this information for both weekdays and weekends, and the data indicates that minorities and non-minorities are likely to use each individual Low Income Fare Program fare type (Single fare, 1-Day, and Monthly Pass) at similar rates. There were no statistically significant difference between the percent of non-minority and the percent of minority trips during the weekday. Similar results were found for the Single fare and 1-Day Pass fare options during the weekend. However, there was a statistically significant difference for the Adult Month/30-Day Pass, which only suggests that non-minority riders are more likely to use the Monthly/30-Day Pass during the weekend. Overall, there are comparable and equally benefitting impacts for both minority and non-minority riders that are eligible for the Low Income Fare Program. Therefore, the above analyses indicates no potential Disparate Impact for minority riders.

Table 3: Proposed Fare Changes and Program Eligible Trips Usage, By Minority Status
2016 TriMet Fare Survey

Fare media	Program Eligible Trips						
	Current Fare	Proposed New Fare	Fare change Pct.	Weekdays		Weekends	
				Pct. of Non-minority Trips (n=1,589) ¹	Pct. of Minority Trips (n=1,171)	Pct. of Non-minority Trips (n=1,570)	Pct. of Minority Trips (n=1,179)
Adult Single fare	\$2.50	\$1.25	-50%	26%	25%	28%	29%
Adult 1-Day Pass	\$5.00	\$2.50	-50%	26%	26%	27%	29%
Adult Monthly/30-Day Pass	\$100.00	\$28.00	-72%	32%	29%	31%	25%
Other Fare Passes*	-	-	-	17%	18%	14%	16%
Total				100%	100%	100%	100%

¹n indicates weighted number of survey responses

Grey cells indicate statistically significant difference at the 95% confidence level

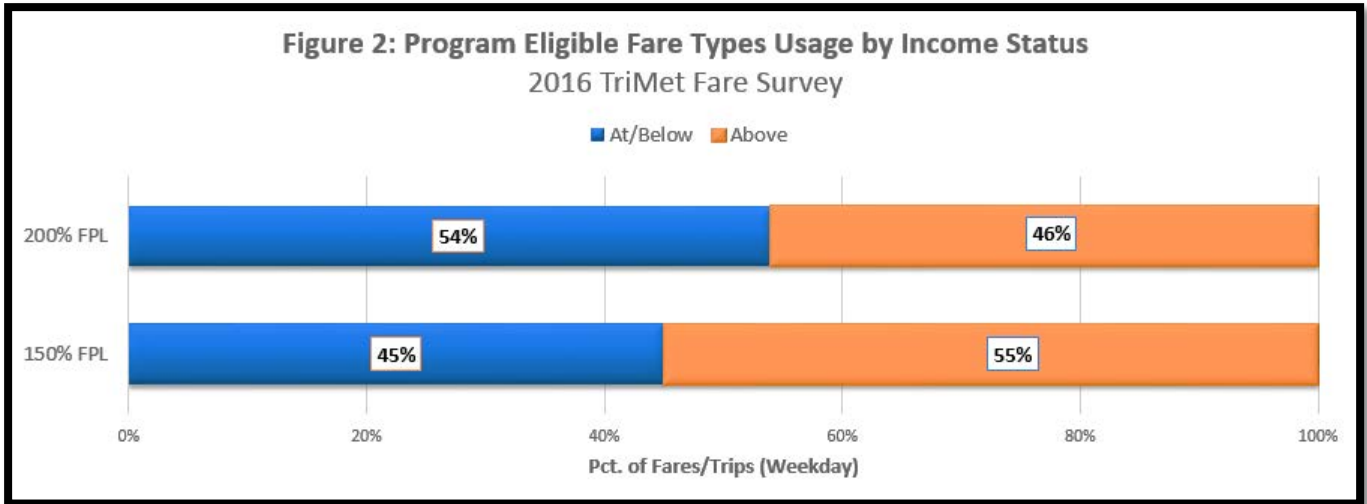
*Adult 7-Day, 14-Day, 30-Day, and Annual Pass are not anticipated to be part of the Low Income Fare Program

- Thus, TriMet finds no potential Disparate Impact on minority populations under the Low Income Fare Program proposal

D. Disproportionate Burden Analysis

In accordance with TriMet’s Disproportionate Burden policy, a low income rider is defined as having a household income at or below 150% of the federal poverty level. To qualify for the low income fare discount, a rider’s household income must be at or below the 200% FPL. Since the Low Income Fare Program reduced fare is inclusive of the agency’s definition of a low-income rider, the first level of analysis will look at the program eligible fare types (Single fare, 1-Day, and Monthly/30-Day Pass) usage by income status. Specifically, the analysis looks to compare low-income status at the 150% and 200% federal poverty levels for eligible fares and the extent to which lower income populations will benefit from the reduced fares.

As shown in Figure 2, 45% of trips made are by TriMet’s definition of a low-income rider. Whereas, the percentage of trips made by ridership at or below 200% FPL is 54%. Simply noted, the purpose of this comparison is to illustrate the extended benefit to lower income populations due to the eligibility threshold being set at/or below the 200% FPL compared to the 150% FPL. In other words, low-income riders stand to benefit from the introduction of a Low Income Fare Program.



Since different fares are proposed to decrease by different percentages, the next level of analysis looks at the degree of decrease by fare type to see whether that leads to any potential disparities. Table 5 denotes this information for both weekdays and weekends, and the data indicates that lower income and higher income are about as likely as each other to use each the following Low Income Fare Program fare types: Single fare and the Adult 1-Day Pass. The exception is the Adult Monthly/30-Day Pass where it is found that a greater share of low-income riders are more likely to use this fare type overall.

Noteworthy, there were statistically significant differences between the percent of low-income and the percent of higher income trips during the weekday for the Adult 1-Day Pass and the Adult Monthly/30-Day Pass. However, there was not a significant difference for the Single fare. Similar results were found for trips made during the weekend.

Thus, the analysis finds no potential disproportionate and adverse effects on low-income riders because:

- a. Low-income riders that are eligible for the program will pay significantly less than they currently do.
- b. Lower income and higher income riders use the single fares and 1-Day Pass at similar rates.
- c. The monthly pass fare type for eligible riders is proposed for the highest percentage decrease, and
- d. Fares paid by low-income riders are more likely to be the monthly/30-Day pass than fares paid by higher income riders.

Table 5: Proposed Fare Changes and Usage, By Income Status
2016 TriMet Fare Survey

Fare media				Weekdays		Weekends	
	Current Fare	Proposed New Fare	Fare change Pct.	Pct. of Higher Income Trips (n=3,171) ¹	Pct. of Low Income Trips ² (n=2,300)	Pct. of Higher Income Trips (n=2,510)	Pct. of Low Income Trips (n=2,360)
Adult Single fare	\$2.50	\$1.25	-50%	25%	26%	28%	28%
Adult 1-Day Pass	\$5.00	\$2.50	-50%	22%	26%	32%	27%
Adult Monthly/30-Day Pass	\$100.00	\$28.00	-72%	26%	32%	20%	30%
Other Passes*	-	-	-	27%	16%	19%	15%
Total				100%	100%	100%	100%

¹n indicates weighted number of survey responses

² Low-income defined as at or below 150% federal poverty; Higher income is all others.

Grey cells indicate statistically significant difference at the 95% confidence level

*Adult 7-Day, 14-Day, 30-Day, and Annual Pass are not anticipated to be part of the Low Income Fare Program

- Thus, TriMet finds no potential Disproportionate Burden on low-income populations under the Low Income Fare Program proposal, as qualifying low-income riders will pay significantly less.

E. Fare Equity Analysis Conclusions

The proposed fare changes require a fare equity analysis to identify any potential disparate impacts on minority riders and/or disproportionate burden on low-income riders. The fare equity analysis found:

- No potential disparate impact on minority riders associated with the Low Income Fare Program
- No potential disproportionate burden on low-income riders associated with the Low Income Fare Program

The proposed fare package would make transit more affordable for adults and families throughout the Portland metropolitan region. Low income adults riding any TriMet service within the service district would be eligible for a fare decrease. This analysis has concluded that minority and low-income riders will not be limited or denied the benefits of the proposed fare changes.

V. Alternatives to Address Findings

The findings of this analysis do not prompt TriMet to consider possible measures to avoid, minimize, and/or mitigate adverse impacts on minority or low-income riders.

VI. Community Engagement

TriMet discussed the Low Income Fare Program proposal with key stakeholders and community members. These discussions focused on adult fare decrease for eligible riders and program eligibility. The following provides a summary of activities conducted leading up to the TriMet Board's decision on whether to adopt the Low Income Fare Program, and beyond if it is adopted.

Regional Low Income Taskforce

After three years of planning and research the Low Income Fare Program was proposed. Commencing in 2013, TriMet and Metro leadership convened a regional Low Income Fare Taskforce (Taskforce) which explored the feasibility of a local program through a regional collaborative effort. The Taskforce included over 22 members from across the Tri-County area, and consisted of local elected officials, community based organizations, business associations and stakeholders from secondary, and post-secondary institutions.

The goals for the Low Income Fare Taskforce were:

1. To develop a better understanding of the approaches other like-communities have used to implement low-income fare programs, and gain a better sense of the challenges and opportunities involved in the current efforts occurring around the country, as well as the applicability to our local context.
2. To use this understanding to help identify potential program parameters including eligibility criteria, potential subsidy levels, and other programmatic concepts to better inform a local approach.

The Taskforce met 5 times over the course of four months in calendar year 2016

- Meeting 1: Build understanding of existing programs around the country
- Meeting 2: ORCA Lift Case Study, peer to peer a profile in an operational model
- Meeting 3: Program Parameters, subsidy and eligibility, balancing the tradeoffs
- Meeting 4: Funding Ideas, Options, and Strategies
- Meeting 5: Final Recommendations and Next Steps

The final outcomes from the Taskforce were as follows:

1. The Taskforce members agreed to support the development of a regional Low Income Fare program
2. The Taskforce members recommended eligibility of up to 200% of Federal Poverty Level
 - One-person household: \$24,120 max
 - Four-person household: \$49,200 max
3. The Taskforce members recommended a program subsidy at 50% off of an Adult ticket/day pass and ~70% off of Adult monthly pass
 - Equivalent to Honored Citizen and Youth fare structure

Transit Equity Advisory Committee (TEAC)

TriMet’s Transit Equity Advisory Committee participated in the program development as well as received timely updates of the program throughout various monthly TEAC meetings. TEAC reviewed the Low Income Fare Program proposal and the analysis results presented here via email correspondence. The low income fare equity analysis report was distributed to TEAC members on November 27, 2017 for their review. The comment period ended on November 30, 2017. There were no concerns or questions brought forward. A majority of TEAC members expressed their approval and support of the Low Income Fare Program.

TriMet Community Partner Forums

TriMet’s Diversity & Transit Equity Department completed a series of community forums. These forums were initiated from the need to communicate and discuss with our Community Partners the upcoming changes, which included an overview of the Low Income Fare Program.

The goals for the department were:

- Allow the community representatives to both gain a better understanding of what TriMet will possibly implement, and
- Give the Community partners the ability to voice their opinion on what they liked, and what they found could use clarification and changes. The surveys allow for the DTE department to tangibly capture an analysis of their opinion.

Table 6: Community Partner Forum Schedule

Date	Location	Address	Time
October 30 th	Rosewood Initiative	16126 SE Stark St.	10am- 12 noon
November 7 th	PCC- Willow Creek	241 SW Edgeway Dr.	10am- 12 noon
November 16 th	Clackamas CC	19600 Molalla Ave.	10am- 12 noon

Results of the Low-Income Fare survey:

- Community representatives recommended that potential participants of the LIF program should be able to register at Community Based Organizations, Government agencies, and culturally specific nonprofits.
- Community representatives also recommended that potential participants should provide the following documentation for eligibility: SNAP Benefits, SSI Award Letters, and TANF (Temporary Assistance for Needy Families). Paystubs for the last 30 days was another recommendation.
- When asked how often participants should have to reapply, 40% suggested 24 months, 26% suggested 18 months, 14% suggested 36 months, 6% suggested 30 months, and the remaining 14% had other varying responses.
- The last question on the Low-Income Fare Program was: How can we best communicate this opportunity to the community you serve? The responses were varying, but the one method that was consistently asked of TriMet is to have more training and outreach forums.

Online Survey

A webpage was developed (<https://trimet.org/lowincome/index.htm>) to encourage stakeholders to provide feedback and to help inform the program model.

TriMet Fall 2017 Open Houses

As noted in Table 7, TriMet staff held seven open houses to facilitate budget discussions with community stakeholders and riders and to communicate proposed service changes and enhancements. Additionally, a table was staffed to share information regarding the Low Income Fare Program as well as to receive feedback on program development. Questions included: 1) where should participants register for the program; 2) what types of documentation should be required in order to verify eligibility; and 3) how often should participants have to reapply? Overall, the feedback received was positive and community members are looking forward to the implementation of the Low Income Fare Program.

Table 7: TriMet Open Houses Schedule

Date	Location	Address	Time	Notes
November 1	Oregon City (Pioneer Community Center)	615 5 th St.	6 pm – 8 pm	Open House
November 2	North Portland (PCC Cascade)	705 N. Killingsworth St.	Noon – 2 pm	Open House
November 6	Gresham (City of Gresham)	1333 NW Eastman Pkwy	6 pm – 8 pm	Division Transit Project Open House
November 8	Tigard (Tigard Ballroom)	8900 SW Commercial St.	6 pm – 8 pm	Open House
November 9	Milwaukie (Milwaukie HS)	2301 SE Willard St.	6 pm – 8 pm	Open House
November 14	Hillsboro (Centro De Prosperidad)	400 E. Main St.	6 pm – 8 pm	Open House
November 15	Downtown Portland (U of O White Stag)	70 NW Couch St.	6 pm – 8 pm	Open House

East County Caring Committee

On August 3, 2017, Commissioner Lori Stegman invited TriMet to update the group on recent events related to the regions transit system. The East County Caring Committee is made up of mostly nonprofit and community based organizations located in the East County area. TriMet staff presented on HB 2777, HB 2017, the fare citation process and the Low Income Fare Program. General feedback was received.

Making Visible Differences Steering Committee

On October 31, 2017, Chairperson Melody Poland and U.S. Environmental Protection Agency Region 10 representative invited TriMet to update the group on TriMet's Title VI Program and the Low Income Fare Program. The Making Visible Differences Steering Committee is made up of mostly local government, academic institutions, nonprofit and community based organizations located throughout the Portland metro area. A majority of the comments mentioned the importance of TriMet increasing awareness and education about the program because of the immense perceived value that it will bring to the region.

APPENDIX A

TriMet Rider Survey

Please fill out this form even if you have already received one on another bus or train.

Dear Rider: TriMet would like to know about the trip you are currently making. Please answer the following questions and return to the surveyor or drop it in the mail.

1. What line are you riding on now? Line # _____ Line name _____							
2. Do you have to transfer to or from a different line to make this trip in one direction?							
01 <input type="checkbox"/> No		02 <input type="checkbox"/> 1 time		03 <input type="checkbox"/> 2 times		04 <input type="checkbox"/> 3 or more times	
3. If you must transfer to make this trip, what lines do you transfer to or from? (not including the bus or train you are on now)							
Line # _____		Line name _____		Line # _____		Line name _____	
<input type="checkbox"/> MAX		<input type="checkbox"/> WES		<input type="checkbox"/> Portland Streetcar		<input type="checkbox"/> C-TRAN route # _____	
4. How did you pay your fare for this trip? (check one) 01 <input type="checkbox"/> TriMet fare							
If Streetcar, which type of fare?		02 <input type="checkbox"/> C-TRAN fare		03 <input type="checkbox"/> Portland Streetcar fare			
01 <input type="checkbox"/> 2-Hour Ticket (\$1)		02 <input type="checkbox"/> Portland Streetcar Annual Pass (\$150)					
5. Which TriMet fare? (Please check one)							
	01 CASH (2-Hr Ticket)	02 TICKET (Book of 10)	03 1-DAY PASS	04 7-DAY PASS	05 14-DAY PASS	06 MONTHLY/ 30-Day PASS	07 ANNUAL PASS
Adult	01 <input type="checkbox"/> \$2.50	01 <input type="checkbox"/> \$25.00	01 <input type="checkbox"/> \$5.00	01 <input type="checkbox"/> \$26.00	01 <input type="checkbox"/> \$51.00	01 <input type="checkbox"/> \$100.00	01 <input type="checkbox"/> \$1,100.00
Youth/Student	02 <input type="checkbox"/> \$1.65	02 <input type="checkbox"/> \$16.50	02 <input type="checkbox"/> \$3.30	02 <input type="checkbox"/> \$ 8.00	02 <input type="checkbox"/> \$15.50	02 <input type="checkbox"/> \$ 30.00	02 <input type="checkbox"/> \$ 330.00
Honored Citizen/STAR	03 <input type="checkbox"/> \$1.00	03 <input type="checkbox"/> \$10.00	03 <input type="checkbox"/> \$2.00	03 <input type="checkbox"/> \$ 7.00	03 <input type="checkbox"/> \$13.50	03 <input type="checkbox"/> \$ 26.00	03 <input type="checkbox"/> \$ 286.00
LIFT	04 <input type="checkbox"/> \$2.15	04 <input type="checkbox"/> \$21.50			04 <input type="checkbox"/> \$31.50	04 <input type="checkbox"/> \$ 62.00	04 <input type="checkbox"/> \$ 682.00
05 <input type="checkbox"/> Employee ID with TriMet sticker							
06 <input type="checkbox"/> College ID with TriMet sticker							
07 <input type="checkbox"/> High school ID with TriMet sticker and/or embedded with TriMet logo							
08 <input type="checkbox"/> Honored Citizen Downtown Pass							
09 <input type="checkbox"/> Other _____							
6. Is your single-fare payment being used for a one-way or a round-trip?				01 <input type="checkbox"/> One-way trip		02 <input type="checkbox"/> Round-trip	
7. If you are using a 1-Day Pass, how many one-way trips will you make on it today? _____							
8. Where did you buy your fare for this trip?							
01 <input type="checkbox"/> Onboard the bus		05 <input type="checkbox"/> Pass by Mail		09 <input type="checkbox"/> Social Service Agency Purchased for me			
02 <input type="checkbox"/> Ticket Vending Machine		06 <input type="checkbox"/> School or Place of Employment		10 <input type="checkbox"/> Other _____			
03 <input type="checkbox"/> TriMet Ticket Office		07 <input type="checkbox"/> Online					
04 <input type="checkbox"/> Retail Store		08 <input type="checkbox"/> Purchased on Streetcar					
9. Do you have a vehicle you could have used to make this trip either as the driver or as a passenger?						01 <input type="checkbox"/> Yes	
						02 <input type="checkbox"/> No	
10. Do you have a checking or savings account? 01 <input type="checkbox"/> Yes							
02 <input type="checkbox"/> No							
11. Do you have or use a pre-paid or regular debit or credit card?							
01 <input type="checkbox"/> Yes (check all that apply)		01 <input type="checkbox"/> Pre-paid card		02 <input type="checkbox"/> Bank-issued debit card		03 <input type="checkbox"/> Bank-issued credit card	
02 <input type="checkbox"/> No							
12. Including yourself, how many people live in your household? _____							
13. How many trips have you taken on a TriMet bus/MAX in the last month? (count each direction as one trip) _____							
14. What is your age? _____							
15. Are you a college student?		01 <input type="checkbox"/> Yes, full-time		02 <input type="checkbox"/> Yes, part-time		03 <input type="checkbox"/> No	
If you are a college student, which college?		01 <input type="checkbox"/> PSU		02 <input type="checkbox"/> PCC		03 <input type="checkbox"/> Other _____	
16. Are you: (check one) 01 <input type="checkbox"/> Asian/Pacific Islander							
02 <input type="checkbox"/> African American/Black		03 <input type="checkbox"/> Caucasian/White		05 <input type="checkbox"/> Multi-racial/bi-racial		07 <input type="checkbox"/> Other _____	
		04 <input type="checkbox"/> Hispanic/Latino		06 <input type="checkbox"/> Native American Indian			
17. What was your total annual household income before taxes in 2011? (check one)							
01 <input type="checkbox"/> Under \$10,000		03 <input type="checkbox"/> \$20,000 to \$29,999		05 <input type="checkbox"/> \$40,000 to \$49,999		07 <input type="checkbox"/> \$60,000 to \$69,999	
02 <input type="checkbox"/> \$10,000 to \$19,999		04 <input type="checkbox"/> \$30,000 to \$39,999		06 <input type="checkbox"/> \$50,000 to \$59,999		09 <input type="checkbox"/> Don't know	
				08 <input type="checkbox"/> \$70,000 or more			
18. Do you speak a language other than English at home? 01 <input type="checkbox"/> Yes							
If yes, what language is this? _____						02 <input type="checkbox"/> No	
Quý vị có nói một ngôn ngữ nào khác ngoài tiếng Anh ở nhà không?						05 <input type="checkbox"/> Có	
除了英文外，您在家還說其他的語言嗎？						06 <input type="checkbox"/> Không	
Разговариваете ли вы на каком-либо еще языке, кроме английского, дома?						07 <input type="checkbox"/> 是	
집에서 영어가 아닌 다른 언어를 사용하십니까?						08 <input type="checkbox"/> 否	
						09 <input type="checkbox"/> Да	
						10 <input type="checkbox"/> Нет	
						11 <input type="checkbox"/> 예	
						12 <input type="checkbox"/> 아니오	
19. How well do you speak English? 01 <input type="checkbox"/> Very well							
Quý vị nói tiếng Anh khá không?		09 <input type="checkbox"/> Rất khá		10 <input type="checkbox"/> Khá		11 <input type="checkbox"/> Không khá	
您說英文的程度如何？		13 <input type="checkbox"/> 非常好		14 <input type="checkbox"/> 好		15 <input type="checkbox"/> 好	
Как хорошо вы разговариваете на английском языке?		17 <input type="checkbox"/> Очень хорошо		18 <input type="checkbox"/> Достаточно хорошо		19 <input type="checkbox"/> Не очень хорошо	
영어로 어느 정도로 잘 구사하십니까?		21 <input type="checkbox"/> 대단히 잘한다		22 <input type="checkbox"/> 잘한다		23 <input type="checkbox"/> 잘하지 못한다	
						20 <input type="checkbox"/> Вообще не говорю	
						24 <input type="checkbox"/> 전혀 하지 못한다	

Please return to surveyor or fold, tape 1" from each edge and mail postage-paid. Thank you for taking time to fill out this survey.



BUSINESS REPLY MAIL

FIRST-CLASS MAIL PERMIT NO. 596 PORTLAND OR

POSTAGE WILL BE PAID BY THE ADDRESSEE

TRIMET
ATTN: FINANCIAL PLANNING
4012 S.E. 17TH AVENUE
PORTLAND, OR 97202-9911



Encuesta a los pasajeros de TriMet

Favor de llenar este formulario aún si ya lo recibió en otro tren o autobús.

Estimado Pasajero: TriMet necesita saber algunos datos sobre el viaje que hace en estos momentos. Favor de contestar las siguientes preguntas. Cuando termine entréguelas al encuestador o envíelas por correo.

1. ¿En que línea viaja en estos momentos?		Línea # _____	Nombre de la ruta/línea _____					
2. ¿Necesita hacer trasbordos de una línea a otra para completar este viaje en una dirección?								
01	<input type="checkbox"/> No	<input type="checkbox"/> Sí. Si la respuesta es sí, ¿cuántas veces?	02	<input type="checkbox"/> 1 vez	03	<input type="checkbox"/> 2 veces	04	<input type="checkbox"/> 3 veces o más
3. Si hace trasbordos en este viaje, ¿de qué líneas a qué líneas trasborda? (no incluya el tren o autobús en que ahora viaja)								
Línea # _____	Nombre de la ruta/línea _____		Línea # _____	Nombre de la ruta/línea _____				
<input type="checkbox"/> MAX	<input type="checkbox"/> WES	<input type="checkbox"/> Portland Streetcar	<input type="checkbox"/> Ruta C-TRAN # _____	<input type="checkbox"/> Transporte SAM _____				
4. ¿Cómo pagó este viaje? (marque una)		01	<input type="checkbox"/> Tarifa de TriMet	02	<input type="checkbox"/> Tarifa de C-TRAN	03	<input type="checkbox"/> Tarifa de Portland Streetcar	
Si pagó pasaje de Streetcar, ¿qué tipo de pasaje?		01	<input type="checkbox"/> Boleto de 2-horas (\$1)	02	<input type="checkbox"/> Pase Anual Portland Streetcar (\$150)			
5. ¿Qué usó para pagar en TriMet? (marque una)								
	01 EFFECTIVO (boleto de 2-horas)	02 BOLETO (talonario de 10)	03 PASE de 1-DÍA	04 PASE de 7-DÍAS	05 PASE de 14-DÍAS	06 PASE de MENSUAL/30-DÍAS	07 PASE ANUAL	
Adultos	01 <input type="checkbox"/> \$2.50	01 <input type="checkbox"/> \$25.00	01 <input type="checkbox"/> \$5.00	01 <input type="checkbox"/> \$26.00	01 <input type="checkbox"/> \$51.00	01 <input type="checkbox"/> \$100.00	01 <input type="checkbox"/> \$1,100.00	
Joven/Estudiante	02 <input type="checkbox"/> \$1.65	02 <input type="checkbox"/> \$16.50	02 <input type="checkbox"/> \$3.30	02 <input type="checkbox"/> \$ 8.00	02 <input type="checkbox"/> \$15.50	02 <input type="checkbox"/> \$ 30.00	02 <input type="checkbox"/> \$ 330.00	
Ciudadano Honorable/STAR	03 <input type="checkbox"/> \$1.00	03 <input type="checkbox"/> \$10.00	03 <input type="checkbox"/> \$2.00	03 <input type="checkbox"/> \$ 7.00	03 <input type="checkbox"/> \$13.50	03 <input type="checkbox"/> \$ 26.00	03 <input type="checkbox"/> \$ 286.00	
LIFT (servicio de transporte para discapacitados)	04 <input type="checkbox"/> \$2.15	04 <input type="checkbox"/> \$21.50		04 <input type="checkbox"/> \$31.50	04 <input type="checkbox"/> \$ 62.00	04 <input type="checkbox"/> \$ 682.00		
05	<input type="checkbox"/> Identificación de empleado con etiqueta de TriMet							
06	<input type="checkbox"/> Identificación de la universidad con etiqueta de TriMet							
07	<input type="checkbox"/> Identificación de Escuela Preparatoria con etiqueta de TriMet							
08	<input type="checkbox"/> Pase de Ciudadano Honorable para el centro de la ciudad							
09	<input type="checkbox"/> Otra _____							
6. Si pagó un solo pasaje, ¿es para un viaje de ida o de ida y vuelta?		01	<input type="checkbox"/> Viaje de ida			02	<input type="checkbox"/> Viaje de ida y vuelta	
7. Si viaja con un pase de 1 día, ¿cuántos viajes sencillos hará con él el día de hoy? _____								
8. ¿Dónde compró su pasaje para este viaje?								
01	<input type="checkbox"/> A bordo del autobús		05	<input type="checkbox"/> Pase por correo		09	<input type="checkbox"/> Una agencia de servicio social lo compró para mí	
02	<input type="checkbox"/> En una máquina expendedora de boletos		06	<input type="checkbox"/> En la escuela o el lugar de trabajo		10	<input type="checkbox"/> Otro _____	
03	<input type="checkbox"/> En una oficina de boletos de TriMet		07	<input type="checkbox"/> En línea				
04	<input type="checkbox"/> En una tienda		08	<input type="checkbox"/> Lo compré en el tranvía				
9. ¿Tiene un vehículo que podría haber usado para hacer este viaje ya sea como conductor o como pasajero?		01	<input type="checkbox"/> Sí			02	<input type="checkbox"/> No	
10. ¿Tiene cuenta bancaria de ahorros o cheques?		01	<input type="checkbox"/> Sí			02	<input type="checkbox"/> No	
11. ¿Tiene o usa tarjeta prepagada, tarjeta de débito o tarjeta de crédito?								
01	<input type="checkbox"/> Sí (marque todo lo que aplica)		01	<input type="checkbox"/> Tarjeta prepagada		02	<input type="checkbox"/> Tarjeta bancaria de débito	
02	<input type="checkbox"/> No		03	<input type="checkbox"/> Tarjeta bancaria de crédito				
12. Incluyendo a usted, ¿Cuántas personas viven en su hogar? _____								
13. En los últimos 30 días, ¿cuántas veces se ha transportado en autobuses de TriMet/MAX? (cuente cada dirección como un recorrido) _____								
14. ¿Cuál es su edad? _____								
15. ¿Es Ud. estudiante universitario?		01	<input type="checkbox"/> Sí, a tiempo completo		02	<input type="checkbox"/> Sí, a medio tiempo		
Si es Ud. estudiante universitario, ¿a qué universidad o college asiste?		01	<input type="checkbox"/> PSU		02	<input type="checkbox"/> PCC		
		03	<input type="checkbox"/> No		03	<input type="checkbox"/> Otro _____		
16. ¿Es Ud.: (marque sólo uno)								
01	<input type="checkbox"/> Asiático/De las Islas del Pacífico		03	<input type="checkbox"/> Caucásico/Blanco		05	<input type="checkbox"/> Multiracial/biracial	
02	<input type="checkbox"/> Afroamericano/Negro		04	<input type="checkbox"/> Hispano/Latino		06	<input type="checkbox"/> Nativo Americano	
17. ¿Cuál fue el ingreso anual de su hogar antes del pago de impuestos para el año 2011? (marque un cuadro)								
01	<input type="checkbox"/> Menos de \$10,000		03	<input type="checkbox"/> \$20,000 a \$29,999		05	<input type="checkbox"/> \$40,000 a \$49,999	
02	<input type="checkbox"/> \$10,000 a \$19,999		04	<input type="checkbox"/> \$30,000 a \$39,999		07	<input type="checkbox"/> \$60,000 a \$69,999	
			06	<input type="checkbox"/> \$50,000 a \$59,999		08	<input type="checkbox"/> \$70,000 o más	
			09	<input type="checkbox"/> No sé				
18. ¿Habla un idioma que no sea inglés?		03	<input type="checkbox"/> Sí			04	<input type="checkbox"/> No	
		¿Qué idioma es ese? _____						
19. ¿Cuán bien habla el inglés?		05	<input type="checkbox"/> Muy bien		06	<input type="checkbox"/> Bien		
		07	<input type="checkbox"/> No bien		08	<input type="checkbox"/> No hablo inglés		

Date: January 24, 2018

To: Board of Directors

From: Neil McFarlane



Subject: **ORDINANCE NO. 347 OF THE TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET) ADOPTING A LOW INCOME FARE PROGRAM AND AMENDING TRIMET CODE CHAPTER 19 (SECOND READING)**

1. Purpose of Item

Ordinance No. 347 amends TriMet Code Chapter 19 and adopts a new Low Income Fare program.

2. Type of Agenda Item

- Initial Contract
- Contract Modification
- Other Ordinance

3. Reason for Board Action

The TriMet Code may be amended only by adoption of an ordinance. Adoption of Ordinance No. 347 requires two readings. The first reading of Ordinance No. 347 occurred at the December TriMet Board of Director's (Board) meeting.

4. Type of Action

- Resolution
- Ordinance 1st Reading
- Ordinance 2nd Reading
- Other

5. Background

Ordinance No. 347 allows TriMet to create a new Low Income Fare program that allows eligible registered individuals earning up to 200% of the federal poverty level the opportunity to purchase adult single use, and day passes at 50% off and monthly passes at 72% off the cost of the adult fare.

TriMet has a long history of creating programs to make transit more affordable for youth, seniors, and riders with disabilities. Under the direction of the Board, TriMet created the Access Transit programs that provide grants and discounted fares to nonprofit organizations, which in turn use these resources to assist low-income riders.

While these programs have provided much needed access for low-income persons served by nonprofits, TriMet did not previously have the resources to implement a comprehensive system-wide program to provide a reduced-price fare for the broader population of low-income riders without additional partners.

Addressing the transportation needs of low-income residents required a comprehensive approach and involvement by many regional jurisdictions and partners to move the idea forward. For over three years, TriMet staff and partners have been looking into the feasibility of implementing a Low Income Fare program that would be sustainable, meaningful, targeted, and manageable.

Under the direction of TriMet's Board, TriMet's General Manager and Metro Councilor Sam Chase successfully convened a regional Low Income Fare Taskforce, which explored the feasibility of a local program through a regional collaborative effort. The Taskforce included over 22 members from across the tri-county area, and consisted of local elected officials, community based organizations, business associations and stakeholders from secondary and post-secondary institutions.

Over the course of 5 months, the Taskforce met and built an understanding of existing programs around the country, heard from current program representatives, discussed potential program parameters, including subsidies, eligibility levels and the need to balance potential tradeoffs, and debated funding options and strategies.

At the conclusion of the process, the Taskforce agreed to the following:

The Taskforce members agreed to support the development of a regional Low Income Fare program.

The Taskforce members recommended eligibility of up to 200% of Federal Poverty Level:

- One-person household: \$23,760 max
- Four-person household: \$48,600 max

The Taskforce members recommended a program subsidy at 50% off of an Adult ticket/day pass, and approximately 70% off of Adult monthly pass. This would make the Low Income Fare program equivalent to Honored Citizen and Youth fare structures.

The primary funding strategy identified by the Taskforce was to advocate for public transportation funds as part of the State's transportation package, with the commitment that any new resources coming to TriMet be prioritized to fund a new Low Income Fare program and increased services. Over the course of the legislative session, many of the Taskforce members leveraged their partnerships and networks, and testified in support of this strategy.

In August of 2017, Governor Kate Brown signed HB 2017 a historic transportation package that included resources for public transit. The new resources allow staff to begin work on building out a new regional Low Income Fare program planned for launch in July of 2018.

Title VI Fare Equity Analysis

Executive Summary: Low Income Fare Program Equity Analysis

In accordance with Title VI of the Civil Rights Act of 1964, FTA Circular 4702.1B, and TriMet's 2016 Title VI Program, TriMet conducts an equity analysis any time fare changes are proposed to ensure that changes do not unfairly impact people of color and low-income populations. The proposal to decrease Adult fares for eligible low-income riders in July 2018 calls for such an analysis prior to the TriMet Board of Directors taking action.

Methodology

TriMet's Title VI Program outlines the agency's Disparate Impact and Disproportionate Burden policies, as well as the way in which TriMet conducts fare equity analyses. In the case of the proposed Low Income Fare program, the analysis aimed to answer two main questions: 1) how might decreasing Adult fares for eligible riders impact minority and/or low-income riders; and 2) do minority and/or low-income riders stand to benefit equitably from this proposal? To answer this question, staff utilized data from the most recent TriMet fare survey, conducted onboard in fall 2016.

Findings

Disparate Impact Analysis (Minority Riders)

The analysis found that a greater percentage of minority riders would be positively affected (i.e., eligible trips) by the fare change than the percentage of minority riders on TriMet services as a whole. Eligible trips are defined as trips taken by low-income riders at or below the 200% federal poverty level. Additionally, minority and non-minority riders that are eligible for the Low Income Fare program use different fare products (e.g. single fares, 1-day pass, and monthly passes) at similar rates.

Therefore, the proposal to decrease single fares, 1-day, and monthly passes by different percentages does not present a potential Disparate Impact.

Disproportionate Burden Analysis (Low-income Riders)

The analysis found that the specific structure of the fare decrease proposal – to decrease Adult single fares by \$1.25, 1-day pass by \$2.50, and monthly passes by \$72 – will positively benefit low-income riders. The program eligibility requirement is inclusive of TriMet's definition of a low income rider. Thus, the program stands to benefit all low-income riders as defined by TriMet's Title VI policy. Additionally, low income and higher income riders use different fare products at similar rates – with the exception of the monthly pass, which is proposed for the highest percentage decrease. However, fares paid by low-income riders are more likely to be the monthly/30-day pass than fares paid by higher income riders.

Therefore, this proposal does not present a potential Disproportionate Burden on low-income riders.

Community Outreach and Public Comment

TriMet's Diversity and Transit Equity Team and other staff utilized a variety of outreach and community engagement efforts in order to gather feedback, understanding, and input into the development of a regional Low Income Fare program.

Transit Equity Advisory Committee (TEAC)

The vision of a regional Low Income Fare program had long been championed by the members of TEAC and in the spring of 2016 they adopted the development of a program as a major initiative to pursue as a committee. TEAC members identified the research areas to focus on, reviewed the products and recommendations of the research team, helped inform the process of the regional taskforce, advocated for the passage of HB 2017, and helped build out the community engagement process.

TriMet Community Partner Forums

As part of its community outreach efforts, TriMet's Diversity & Transit Equity Department completed a series of community forums targeting 80 Access Transit partner agencies who serve transit dependent communities. The goal of these forums was to provide awareness and engagement opportunities for our community partners around the upcoming changes, which included an overview of the Low Income Fare program.

Community Partner Forum Schedule:

Date	Location	Address	Time
October 30 th	Rosewood Initiative	16126 SE Stark St.	10am-12 noon
November 7 th	PCC- Willow Creek	241 SW Edgeway Dr.	10am-12 noon
November 16 th	Clackamas CC	19600 Molalla Ave.	10am-12 noon

TriMet Fall 2017 Open Houses

TriMet staff held seven open houses in Oregon City, North Portland, Gresham, Tigard, Milwaukie, Hillsboro, and downtown Portland to facilitate budget discussions with community stakeholders and riders, communicate proposed service changes and enhancements and discuss new initiatives related to fare enforcement, and the implementation of a Low Income Fare program. At each event, a table was staffed to share information regarding the Low Income Fare program as well as to receive feedback on program development. Questions included: 1) where should participants register for the program; 2) what types of documentation should be required in order to verify eligibility; and 3) how often should participants have to reapply? Overall, the feedback received was positive and community members are looking forward to the implementation of the Low Income Fare program.

Diversity and Transit Equity Staff attended and presented on TriMet's efforts around establishing a regional Low Income Fare program to the East County Caring Committee in August of 2017. Diversity and Transit Equity Staff also attended and presented on the program at the October 2017, Making Visible Differences Steering Committee

Online Survey

In addition to its in-person convening's, community forums, open houses, and community presentations, TriMet also sought feedback online through a webpage introduction to a low-income fare <https://trimet.org/lowincome/index.htm> and encouraged riders and systems stakeholders to weigh in on programmatic areas to help inform the program model.

6. Financial/Budget Impact

The potential cost of implementing a Low Income Fare Program is expected to be approximately \$12.3 million per year.

7. Impact if Not Approved

If the Board does not proceed with a second reading and passage of Ordinance No. 347, the existing fare provisions of the TriMet Code would remain in place. However, as part of HB 2017 TriMet has been authorized to move forward with a local program and will soon be resourced to implement the initiative. TriMet has previously committed to local elected officials, community based organizations, riders, and system stakeholders of its intent to begin the new program by July of 2018. Failure to approve the ordinance could result in TriMet not being able to meet that timeline.

ORDINANCE NO. 347

ORDINANCE OF THE TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET) ADOPTING A LOW INCOME FARE PROGRAM AND AMENDING TRIMET CODE CHAPTER 19 (SECOND READING)

THE BOARD OF DIRECTORS OF THE TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET), pursuant to the authority of Oregon Revised Statutes Chapter 267, having considered the transit equity service change analysis Final Report, does hereby ordain and decree the following Ordinance:

Section 1- Adoption of Changes to TriMet Code Chapter 19

Amendments to TriMet Code Chapter 19 are adopted as set forth in the attached Exhibit A, which is incorporated into and made part of this Ordinance.


Section 2- Experimental Fare

Upon approval by the General Manager, a Low Income Fare consistent with the amendments to TriMet Code Chapter 19 in Section 1 may be implemented on a temporary basis as an experimental fare prior to the operative date of Section 1 of this Ordinance.

Section 3- Effective Date

This Ordinance shall take effect thirty days after the date of its adoption. The amendments to TriMet Code Chapter 19 in Section 1 shall be operative on July 1, 2018.

Dated: January 24, 2018



Presiding Officer

Attest:



Recording Secretary

Approved as to Legal Sufficiency:


Legal Department

ORDINANCE NO. 347

EXHIBIT A

TriMet Code (TMC) Chapter 19, Fares, Section 19.05 Definitions and Section 19.15 Fares, are amended as set for below. Additions are show in underline, bold text.

*Unchanged sections of the chapter omitted for brevity, indicated by a set of three asterisks (***)*

CHAPTER 19 – FARES

19.05 **Definitions.** As used in this Chapter, unless the context requires otherwise:

A. “Honored Citizen” means:

- (1) Persons 65 years of age or older who show valid government-issued photo identification showing proof of age, or a valid TriMet photo Honored Citizen Card;
- (2) Persons under 65 years of age registered legally blind by the Commission for the Blind who show a valid TriMet Honored Citizen Card;
- (3) Persons under 65 years of age registered disabled by the Social Security Administration who show a valid TriMet Honored Citizen Card;
- (4) Persons under 65 years of age who are certified disabled by the State of Oregon Vocational Rehabilitation Division, State of Oregon Senior and Disabled Services Division or by the U.S. Railroad Retirement Board when each applies the same standards of disability as are applicable to persons who are determined to be disabled pursuant to subparagraph 3 above and who show a valid TriMet Honored Citizen Card;
- (5) Veterans under 65 years of age certified 100% disabled by the Veterans Administration who show a valid TriMet Honored Citizen Card;
- (6) Persons under 65 years of age qualifying as “Temporarily Disabled” under criteria established by TriMet, and so certified by a licensed physician, and who show a valid TriMet Honored Citizen Card;
- (7) Persons qualified eligible by the Clackamas, Clark, Multnomah or Washington County Association for Retarded Citizens, or the Clackamas, Multnomah or Washington County Mental Health Association under the criteria established by TriMet and those agencies, who show a valid TriMet Honored Citizen STAR Card (marked with a “STAR”);
- (8) Persons under 65 years of age, not verified disabled by the Commission for the Blind, Social Security Administration, United States Railroad Retirement Board or the Veterans Administration, but who qualify as disabled under criteria established by TriMet and are so certified by a licensed physician, and who show a valid TriMet Honored Citizen Card;

- (9) Persons certified by a licensed physician or health or social service professional to qualify for a TriMet Honored Citizen "A" Card (marked with an "A") under criteria established by TriMet and who show a valid TriMet Honored Citizen "A" Card;
- (10) Persons qualified eligible by C-Tran who show a valid C-Tran Senior, C-Tran Disabled, or C-Tran C-Van Identification Card; and
- (11) Persons who show a valid Medicare Card and either (a) valid government-issued photo identification or (b) a valid TriMet photo Honored Citizen Card, as proof of identity for the Medicare Card.

Replacement TriMet Honored Citizen Cards are subject to payment of a \$5.00 fee.

B. "Honored Citizen Downtown Bus Pass" is a photo identification card issued to persons qualifying for Honored Citizen status as set forth in Section 19.05(A) above, who provide proof of residency within the area bounded on the North by NW Irving, except that at the intersection of NW Irving and NW Station Way it shall be bounded on the North by NW Station Way to NW Broadway and then by NW Broadway south to NW Irving and continuing west on NW Irving to the Stadium (I-405) Freeway, on the West and South by the Stadium (I-405) Freeway and on the East by the Willamette River, under criteria established by TriMet. The photo identification card allows fareless travel on bus and rail trips which begin and end within the area described above, for a period of two years from the date of issuance. The General Manager may promulgate Administrative Requirements governing the Program requirements of the Honored Citizen Downtown Bus Pass, including but not limited to the fee for participation in the Program.

C. "Low Income Fare" is a fare designation available to persons who are determined by TriMet to meet the eligibility requirements for a reduced fare because the person can demonstrate to TriMet's satisfaction through a process established by TriMet that their annual income is at or less than 200% of the Federal Poverty Level. The Federal Poverty Level is a measure of income issued by the United States Secretary of Health and Human Services.

- (1) A person deemed eligible by TriMet for the Low Income Fare will be provided a non-transferable Low Income Fare identification card.**
- (2) The General Manager may promulgate Administrative Requirements governing eligibility, applications, the issuance and appearance of Low Income fare cards, renewals, and any other requirements for the Low Income Fare.**

[subsequent subsections renumbered]

(19.05 amended by Ordinances No. 162, Section 1; Ordinance No. 178, Section 1; Ordinance No. 190, Section 1; Ordinance No. 239, Section 1; Ordinance Nos. 277, 286, 299, 309, 312, 316, 317 and 323)

A. Regular Transit Services:

The fares payable for use on the TriMet transit system shall vary according to the status of the rider and method of payment. Any person displaying a valid Low Income Fare identification card issued under TMC 19.05 is permitted to use as proof of payment any HONORED CITIZEN fare instrument, including eFare, described in this section. A valid Low Income Fare identification card qualifies as a TriMet Honored Citizen identification card when required to be displayed as proof of eligibility for an Honored Citizen fare. Persons eligible for the Low Income Fare are not eligible for the Honored Citizen Downtown Bus Pass.

The fares payable for use on TriMet and shall be as follows:

(1) Monthly Passes and 30-Day Passes

(a) <u>Status</u>	<u>Fare</u>
YOUTH	\$28.00
HONORED CITIZEN	\$28.00
ADULT	\$100.00

- (b) A 30-Day Pass shall be valid for travel on any regularly scheduled TriMet route in accordance with the status of the rider for the period of thirty (30) consecutive days from the date of purchase.

(2) Pre-Paid Tickets

(a) <u>Status</u>	<u>Fare</u>
YOUTH	10/\$12.50
HONORED CITIZEN	10/\$12.50
ADULT	10/\$25.00

- (b) Pre-paid unvalidated tickets may be used in the amount of their cash value for payment of additional fare, i.e., two Adult tickets may be used for an Adult 1-Day Pass. Refunds for overpayment will not be given.

(c) Field Trip Group Discount (“Class Pass”) Tickets

- (1) Groups whose members are 18 years of age or younger, traveling with at least 15 but not more than 35 members on the bus, or with at least 15 but not more than 70 members on MAX, including other persons aged 18 or older traveling with

the group as designated group leader(s) or chaperone(s), are eligible for the Field Trip Group Discount (“Class Pass”) ticket. The cost of the ticket shall be \$1.00 per person. A ticket must be purchased for the trip. The ticket shall be valid for travel only for the date, route(s), time(s), and number of persons specified on the ticket. Each member must carry a ticket, or the group leader must carry a ticket for the group.

- (2) The group must schedule the trip at least 14 days in advance. Trips may be scheduled for weekdays or weekends using regularly scheduled service. Weekday trips must occur between the hours of 9:00 a.m. and 3:00 p.m. Specified trip times shall be at the discretion of TriMet. TriMet reserves the right to schedule trips according to anticipated available capacity on regularly scheduled service.

Possession of a Class Pass ticket in no way guarantees available vehicle capacity on scheduled trip times. In the event that all members of a group are unable to board the vehicle as specified on the Class Pass ticket, due to heavy passenger loads, the operator will arrange to have the Class Pass ticket be valid on the next regularly scheduled vehicle.

Groups wishing to reschedule a trip must cancel at least one business day in advance of the scheduled trip. Trips must be scheduled at least 14 days in advance of the new travel date. A new ticket will be issued to the group leader stating the new date, route(s), time(s), and number of persons in the group.

- (3) Class Pass tickets shall be available for purchase only at TriMet’s Ticket Office at Pioneer Square, or by mail. Tickets must be purchased at least 14 days in advance. Tickets are nonrefundable, nontransferable, and shall not be laminated or duplicated.

(d) Event Fare

An Event Fare shall be available to events for all tickets for the event which are purchased and distributed in advance through ticket outlets. The Event Fare shall be \$2.50 per ticket per day, which shall be valid fare for travel, all hours on the day of the event(s) for which the ticket is purchased. Tickets for the event which are sold at the door shall not be included in the Event Fare program.

(3) Cash Fares

<u>Status</u>	<u>Fare</u>
YOUTH	\$1.25
HONORED CITIZEN	\$1.25
ADULT	\$2.50

(4) Annual Passes

<u>(a) Status</u>	<u>Fare</u>
YOUTH	\$308.00
HONORED CITIZEN	\$308.00
ADULT	\$1,100.00

- (b) Annual Passes must be purchased as one lump sum; installment payments are not permitted, except that: (1) employers who enter into a written annual agreement to purchase Annual Passes in a minimum dollar amount of \$6,050, may elect to make quarterly installment payments subject to administrative program requirements, and (2) employers who enter into a written annual agreement to purchase Annual Passes, where the Annual Pass year ends on August 31, shall receive a pro-rated per pass price in the sum of: the number of months remaining in the Annual Pass year X the Monthly Pass price X .92. The price paid by employers for Annual Passes under a written agreement is subject to adjustment to include any Adult Annual Pass fare increases adopted by the TriMet Board that take effect during the term of the agreement. Employers shall pay any Adult Annual Pass price increases during the term of the agreement in accordance with administrative program requirements. However, the total amount of increase shall not exceed 3% of the employer's per pass price that was in effect on September 1 (or the effective date of the agreement).

(5) Select Term Pass Program

- (a) Colleges with a campus(es) located within the TriMet district may purchase for their qualified students at that campus(es), Term passes in accordance with the Select Term Pass program requirements set forth in this Paragraph (5) and the administrative program requirements established for the fare. A "campus" means a building(s) located at one physical location within the TriMet district under the control of a college. "Qualified students" are either full-time or part-time students, as defined by the college administrative criteria, who attend class at a campus. The college shall be required to enter into a written contract for purchase of the Select Term Pass in accordance with the administrative program requirements established for the fare. The Select Term Pass fare instrument shall be valid for travel for the Term Pass fare period.
- (b) The Select Term Pass fare instrument shall consist of the student's college photo identification card with an affixed TriMet issued validation sticker, or a TriMet approved eFare Program card ("eFare card"), and must be carried by the student as proof of fare payment.
- (i) If using TriMet issued validation stickers, colleges shall provide the student with a photo identification card, which shall also include the college's name. The validation sticker must be placed on the photo identification card. A student's photo identification card with an affixed Term validation sticker shall be valid through the month and year designated on the sticker.

(ii) Colleges may use a TriMet approved eFare card, which shall be required to display the college's name, the student's name, and may include the student's photo. If the approved eFare card does not include a photo, the student may be asked to display other valid photo identification as proof of their identity. Students are required to tap their eFare card prior to each vehicle boarding and upon occupying any district areas requiring proof of fare payment.

(iii) Colleges shall verify student status before providing an individual with a Term Pass fare instrument. The Term Pass fare instrument may not be provided to or used by non-students, is non-transferable, and is a valid fare instrument only for the person whose name appears on the card.

(c) The Term Pass fare period shall be established in the written contract with the college. During the contract period, the Select Term Pass price shall be calculated on a per Term basis (Term Pass fare period). The price of the Select Term Pass shall be the sum of the number of months in the Term times the Board adopted Adult Monthly Pass fares that will be in effect during that Term, less a discount of 10%. The price will not be pro-rated. The price paid by college for the Select Term Pass under a written contract is subject to adjustment to include any Adult Monthly Pass fare increases adopted by the TriMet Board that take effect during the term of the contract. Colleges shall pay any Select Term Pass price increases during the term of the contract in accordance with administrative program requirements.

(d) Only one pass may be sold to each qualified student per Term Pass fare period.

(6) 1-Day Pass

A 1-Day Pass shall be valid for travel on any regularly scheduled TriMet route, in accordance with the status of the rider, for the remainder of the service day in which the 1-Day Pass is valid.

<u>Status</u>	<u>Fare</u>
YOUTH	\$2.50
HONORED CITIZEN	\$2.50
ADULT	\$5.00

(7) 7-Day Pass

The 7-Day Pass shall be valid for travel on any regularly scheduled TriMet route in accordance with the status of the rider for the period of seven (7) consecutive days.

<u>Status</u>	<u>Fare</u>
YOUTH	\$7.50
HONORED CITIZEN	\$7.50

ADULT \$26.00

(8) 14-Day Pass

A 14-Day Pass shall be valid for travel on any regularly scheduled TriMet route in accordance with the status of the rider for the period of fourteen (14) consecutive days as follows:

<u>Status</u>	<u>Fare</u>
YOUTH	\$14.50
HONORED CITIZEN	\$14.50
ADULT	\$51.00

(9) Washington County Commuter Rail (WES) Service

Fares payable for use of Washington County Commuter Rail (WES) Service shall be the same as other regular fixed route fares established according to the status of the rider and the method of payment for travel as set forth in TMC Section 19.15.

B. Door-to-door LIFT services:

- (1) The fare for door-to-door LIFT services, excluding rides paid for by agencies under contract with TriMet, shall be:
 - (a) Cash: \$2.50.
 - (b) Pre-paid Tickets: 10/\$25.00.
 - (c) Monthly Pass: \$74.00; non-transferable.
 - (d) Annual Pass: \$888.00; non-transferable.
 - (e) 20 trip punch card: \$48.00; valid for 20 trips on LIFT service only, non-expiring.
 - (f) 14-Day Pass: \$37.50; valid for travel on LIFT service for a period of fourteen (14) consecutive days, non-transferable.
- (2) The following additional methods of fare payment will be accepted as total payment for door-to-door LIFT services:
 - (a) A regularly scheduled service route transfer plus \$1.50;
 - (b) Regularly scheduled service route tickets will be accepted on LIFT service for their face value toward the LIFT cash fare; or
 - (c) Adult 1-Day Pass.

- (3) Purchase of a pre-paid ticket or pass does not guarantee that a ride will be provided.
- (4) A LIFT pre-paid ticket, LIFT monthly pass or LIFT annual pass is valid for travel on regular fixed route service when accompanied by valid TriMet Honored Citizen identification.

C. Electronic Fare (“eFare”) Program

Use of an electronic fare payment system (“eFare”) Program shall be subject to the following fare provisions:

(1) eFare Cards

- (a) An eFare card is a contactless electronic fare instrument that allows a rider to tap at designated card readers to pay their fare.
- (b) The rider must tap their eFare card prior to each vehicle boarding to validate their trip or upon occupying district areas requiring proof of fare payment.
- (c) eFare cards are non-transferable.
- (d) The following fares shall be available using stored value from an eFare card account, according to the status of the rider:
 - (i) 2 ½ Hour Ticket
A rider shall be allowed unlimited rides for a duration of 2 ½ hours following the initial eFare card tap.

<u>Status</u>	<u>Fare</u>
YOUTH	\$1.25
HONORED CITIZEN	\$1.25
ADULT	\$2.50

(ii) 1-Day Pass

Fares paid per card tap shall accumulate, and a rider shall be charged only up to the applicable 1-Day Pass price and not more (“capped”), regardless of how many taps the rider accrues during the service day. Once charges accrue to the applicable 1-Day Pass price during a service day, additional trips are free for the remainder of that service day.

<u>Status</u>	<u>Fare</u>
YOUTH	\$2.50
HONORED CITIZEN	\$2.50

ADULT \$5.00

(iii) 1-Month Pass

Fares paid per card tap shall accumulate, and a rider shall be charged only up to the applicable 1-Month Pass price and not more (“capped”), regardless of how many taps the rider accrues during the calendar month. Once charges accrue to the applicable 1-Month Pass price during a calendar month, additional trips are free for the remainder of that calendar month.

<u>Status</u>	<u>Fare</u>
YOUTH	\$28.00
HONORED CITIZEN	\$28.00
ADULT	\$100.00

- (e) Reloadable eFare cards shall be available for purchase for a fee of \$3.00.
- (f) A minimum \$5.00 load to an eFare card account shall be required, except that no minimum load shall be required for eFare cards loaded at the TriMet Ticket Office.
- (g) Annual Passes may be purchased as one lump sum, according to the requirements set forth in TMC Section 19.15(A)(4). Annual Passes shall be issued in the form of an eFare card.
- (h) Payment of fares for LIFT paratransit services by an eFare card shall be initiated either by tapping a card reader, or payment shall be deducted from the rider’s account when the LIFT operator picks up the rider and confirms the rider’s trip through their Mobile Driver Terminal (MDT). LIFT payments in this paragraph (h) exclude rides paid for by agencies under contract with TriMet. The following LIFT paratransit fares shall be available for payment from an eFare card account:
- (i) Single Ticket: \$2.50
- (ii) 1-Month Pass: \$74.00. Fares paid shall accumulate, and a rider shall be charged only up to the applicable 1-Month Pass price and not more (“capped”), regardless of how many taps the rider accrues during the calendar month. Once charges accrue to the applicable 1-Month Pass price during a calendar month, additional trips are free for the remainder of that calendar month.
- (iii) Annual Passes may be purchased as one lump sum, according to the requirements set forth in TMC Section 19.15(B)(1)(d).
- (iv) Payment of a LIFT fare under this paragraph (h) shall be valid as payment for travel on regular fixed-route service. In the case a rider begins their trip on fixed-route by tapping their LIFT eFare card, the applicable Honored Citizen fare and fare identification requirements shall apply.

(2) Other eFare Payment Instruments

Financial instruments issued by the major payment brands including VISA, MasterCard, American Express and Discover that are capable of providing payment through contactless tapping at designated card readers may be used to purchase the Adult 2 ½ Hour Ticket and Adult 1-Day Pass per paragraphs (1)(d)(i) and (ii) above. The rider must tap their fare payment instrument prior to each vehicle boarding to validate their trip or upon occupying district areas requiring proof of fare payment.

Attachment K

FY2019 Annual Service Plan Equity Analysis



Title VI Service Equity Analysis: FY2019 Annual Service Plan

Department of Diversity & Transit Equity

April 26, 2018

Date: April 25, 2018

To: Board of Directors

From: Doug Kelsey

Subject: **ORDINANCE 350 OF THE TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET) ADOPTING SERVICE CHANGES, UPDATING ROUTE DESIGNATIONS, AND AMENDING TRIMET CODE CHAPTER 22 (SECOND READING)**

1. Purpose of Item

Ordinance 350 requests that the TriMet Board of Directors (Board) adopt service changes and update route designations contained in TriMet Code Chapter 22.

2. Type of Agenda Item

- Initial Contract
- Contract Modification
- Other: Ordinance

3. Reason for Board Action

The Board may adopt service changes and update TriMet Code route designations by ordinance. The TriMet Code may be amended only by adoption of an ordinance. The Board conducted a first reading of Ordinance 350 at its March 28, 2018 meeting.

4. Type of Action

- Resolution
- Ordinance 1st Reading
- Ordinance 2nd Reading
- Other _____

5. Background

Ordinance 350 adopts service changes and updates route designations set forth in TriMet Code Chapter 22. The proposed service changes originate from the District's Service Enhancement Plan (SEP) process addressing the agency's 20-year vision for bus service improvements within the TriMet district and from public input before and after the initial proposed changes.

A. Proposed Service Changes

Ordinance 350 includes bus service changes for fiscal year 2019. In this fiscal year, 2 new bus lines will be added, 4 bus lines will have trips added due to overloads, 4 bus lines will have increased weekday frequencies, 7 bus lines will have increased span or

new weekend service, and 2 bus lines will have 24-hour service. There are 3 bus lines that will have a route change or extension. The new changes will begin in September 2018 and March 2019 as noted below.

Quarter	Line	Service Change
	4 Division/Fessenden split into two lines: 4 Fessenden 2 Division	Split into two lines, Line 2-Division and Line 4-Fessenden. The current Line 4-Division/Fessenden is very long and experiences difficulty staying on time. The line is being split to improve reliability by reducing the opportunities for congestion.
	20 Burnside/Stark	Increased weekday midday frequency between Beaverton TC and Portland. Operate service 24 hours a day, with the intention of getting late night and early morning workers to/from work.
	73 122 nd Ave.	Increased weekday midday frequency.
	September 2018	61 Marquam Hill/Beaverton 64 Marquam Hill/Tigard 66 Marquam Hill/Hollywood 68 Marquam Hill/Collins Cir.
96 Tualatin/I-5		Add weekday midday service
57 Tualatin Valley Highway		Operate service 24 hours a day, with the intention of getting late night and early morning workers to/from work.
81 Kane/257 th		Increase weekday, peak frequency and operate service earlier and later to help late night and early morning workers get to/from work in the Troutdale Reynolds Industrial Park.
272 PDX Night Bus (new line)		Operate between PDX and SE Stark and SE 80 th via 82 nd Ave. Only operates during the hours that the Red Line MAX is not operating. This line is intended to help late night/early morning workers get on and off their shifts as well as help passengers on early departures and late arrivals.
17 Holgate/Broadway 35 Macadam/Greeley 56 Scholls Ferry Rd. 94 Pacific Highway/Sherwood		Added trip(s) to reduce overcrowding.
March 2019		24 Fremont
	79 Clackamas/Oregon City	Change route for a more direct trip and to serve a new area.
	31 Webster (new line)	A new line serving Webster Rd. and parts of Gladstone formerly served by Line 79.

The complete list of proposed Ordinance 350 service changes are set forth in Exhibit A.

B. Service Change Public Process

The proposed service changes are the result of numerous conversations and meetings with jurisdictions, businesses, customers, and community stakeholders. In addition to outreach activities conducted by TriMet service planners, advertisements regarding the proposed service changes were placed in newspapers across the district during two phases of outreach.

In November 2017, TriMet launched the initial feedback plan for the proposed service changes. TriMet sent postcards to residents around the lines proposed to change, posted signs at affected stops, published ads in community newspapers, rode buses to distribute information, and sent emails to interested parties and riders. TriMet's website solicited feedback about the proposed service changes (www.trimet.org/plan). TriMet also held seven (7) open house meetings around the metro area, including one conducted for Spanish speaking populations.

In February 2018, TriMet used the feedback from the initial phase to update some of the proposed changes and then launched a second round of outreach, including community newspaper ads, postcards, riding the buses to hand out information, and emails to interested parties.

On February 15, 2018, TriMet hosted an Open House at the Legacy Emanuel Hospital to provide information and solicit public comment on the revised proposal. Between 170 and 200 people attended the eight (8) open house meetings held during both outreach phases (the exact number is not known because not everyone signed in).

The service improvements were also reviewed with TriMet's Transit Equity Advisory Committee, Committee on Accessible Transportation, and HB2017 Transit Advisory Committee. The HB2017 Transit Advisory Committee voted to include the FY19 service improvements in the transportation improvement plan to be submitted to the Oregon Transportation Commission as required by HB2017.

Finally, public comment on the proposed service changes was accepted by phone, email, standard mail, and at all the public meetings. The FY19 Annual Service Change Outreach Report was included in the Board packet for the March meeting and an opportunity for public testimony was provided during the March meeting. A summary of any comments received since the March 28, 2018 meeting will be provided to the Board prior to the April 25, 2018 Board meeting.

C. Title VI Transit Equity Analysis

In accordance with Federal Transit Administration (FTA) Title VI Circular 4702.1B implementing Title VI of the Civil Rights Act, major service changes must be analyzed to identify potential disproportionate impacts to minority and low-income populations. Ordinance 350 includes 12 major service changes.

The TriMet draft Title VI service equity analysis (Report) was provided to the Board before the March 2018 meeting. The Report evaluated potential adverse effects and benefits associated with the proposed major service changes. To summarize, the Title VI concerns are minimal with the proposed service changes outlined in Ordinance 350. The proposed service changes improve service significantly for minority and low-income populations, with only three improvements (to the Lines 64, 66, and 31) serving areas with relatively low minority populations and two improvements (Lines 64 and 66) serving a relatively low proportion of low-income households as compared to the TriMet district. However, improving service on these lines does not raise concerns of an inequitable distribution of benefits given: a) the results of the system-level analysis; b) 9 lines proposed for improvements did not have any line-level Disparate Impacts; and c) 10 lines proposed for improvements did not have any line-level Disproportionate Burdens. The one proposed service reduction (to the Line 79) also does not appear to create disproportionate and adverse effects given the low concentrations of minority and low-income populations potentially impacted.

The results and findings of the Title VI service equity analysis was presented to the Board for their consideration at the March 28, 2018 meeting. The final Report with any supplemental public feedback will be provided to the Board prior to the April 25, 2018 meeting.

6. Financial/Budget Impact

Service changes proposed in Ordinance 350 will result in a FY2018 budget impact of approximately \$8.0 million, with about half of it paid for by revenues generated by the 2016 payroll tax increase and half coming from HB2017 funding.

7. Impact if Not Approved

The Board may choose not to conduct a second reading for Ordinance 350 at its April 25, 2018 meeting. This option, however, is not recommended. The proposed service changes enable TriMet to continue to serve the growing region, provide expanded service, and maintain service capacity and reliability.

ORDINANCE NO. 350

ORDINANCE OF THE TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET) ADOPTING SERVICE CHANGES, UPDATING ROUTE DESIGNATIONS, AND AMENDING TRIMET CODE CHAPTER 22 (SECOND READING)

THE BOARD OF DIRECTORS OF THE TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET), pursuant to the authority of Oregon Revised Statutes Chapter 267, having considered the transit equity service change analysis Final Report, does hereby ordain and decree the following Ordinance:

Section 1- Adoption of Service Changes

Service Changes are adopted as set forth on the Attached Exhibit A, which is incorporated into and made part of this Ordinance. In accordance with TriMet Code Section 22.05, new Schedule Notices shall be filed for affected lines.

Section 2- Amendment of TriMet Code Chapter 22

TriMet Code Section 22.05 is amended to make the Route Designation updates set forth in attached Exhibit A.

Section 3- Effective/Operative Dates

This Ordinance shall take effect thirty days after the date of its adoption. Operative dates for specific Service Changes and Route Designation updates shall be as designated on Exhibit A.

Dated: April 25, 2018

Presiding Officer

Attest:

Recording Secretary

Approved as to Legal Sufficiency:



Legal Department

**ORDINANCE NO. 350
EXHIBIT A**

Service Changes and TriMet Code Chapter 22 Route Designation Updates

Service Changes are adopted and TriMet Code Chapter 22 Route Designations are updated as set forth below:

Section 1 – Service Changes

Affected Lines	Description
	<i>Operative September 2, 2018</i>
4 Division/Fessenden split into two lines: 2 Division 4 Fessenden	Split the line into two routes to help buses stay on time: Line 2-Division running between Gresham Transit Center and Downtown Portland, and Line 4-Fessenden between Downtown Portland and St. Johns. Transfer between the lines on the Transit Mall in Downtown Portland.
20 Burnside/Stark	Service 24/7 between Beaverton Transit Center and Gresham to accommodate earlier and later work shifts. Increased frequency between Beaverton TC and Downtown Portland.
57 Tualatin Valley Highway	Service 24/7 between Beaverton Transit Center and Forest Grove.
61 Marquam Hill/Beaverton	Earlier and later trips to and from Marquam Hill to accommodate earlier and later work shifts.
64 Marquam Hill/Tigard	Earlier and later trips to and from Marquam Hill to accommodate earlier and later work shifts.
66 Marquam Hill/Hollywood	Earlier and later trips to and from Marquam Hill to accommodate earlier and later work shifts.
68 Marquam Hill/Collins Cir.	Earlier and later trips to and from Marquam Hill to accommodate earlier and later work shifts.
73 122 nd Ave.	Increased weekday mid-day frequency to help get riders to jobs, shopping and recreation.
81 Kane/257 th	Increased weekday, peak frequency and hours of operation to better serve businesses in the area.

Affected Lines	Description
96 Tualatin/I-5	New weekday, mid-day service between Tualatin and Downtown Portland in response to community feedback.
272 PDX Night Bus	A new bus route operating between the airport and SE Stark and 80 th when the MAX Red Line isn't running. This would provide transit access to PDX via 82 nd Avenue where riders could transfer to proposed overnight service on Line 20 at Burnside.
<i>Operative March 3, 2019</i>	
Line 24 Fremont	Extend the route over the Fremont Bridge to NW Portland and Goose Hollow in SW Portland where it would connect with MAX Blue and Red line service. Increased frequency weekday and add weekend service.
Line 31 Webster	New route between Clackamas Town Center and Oregon City Transit Center via Thiessen, Webster, Arlington and McLoughlin that covers some of the old Line 79 route.
Line 79 Clackamas/Oregon City	Reroute Line 79 to 82 nd Ave, I-205 and Washington Street, providing a more direct trip between Clackamas Town Center and Oregon City, and eliminate service on Strawberry Lane.

Section 2 – Route Designation Revisions to TriMet Code Chapter 22, Section 22.05

Operative September 2, 2018

Add “272 PDX Night Bus”

Add “2 Division”

Change “4 Division/Fessenden” to “4 Fessenden”

Change “24 Fremont” to “24 Fremont/NW 18th Ave.”

Operative March 3, 2019:

Add “31 Webster”

Executive Summary

TriMet is proposing to implement several service improvements in fall 2018 and spring 2019. In accordance with Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B, TriMet conducts an Equity Analysis any time Major Service Changes are proposed to ensure that changes do not unfairly impact people of color and low-income populations. The service proposal includes Major Service Changes to twelve bus lines, including two brand new lines. Thus, an analysis is required prior to the TriMet Board of Directors taking action.

Methodology

TriMet's Title VI Program outlines the agency's Major Service Change, Disparate Impact, and Disproportionate Burden policies, as well as the way in which TriMet conducts Equity Analyses. Major Service Changes are analyzed for both potential adverse effects and distribution of benefits. This is done at both the individual line-level and system-level, and the analysis seeks to identify any potential disparities based on race/ethnicity or income.

Major Service Changes

The proposed addition of two brand new bus lines, a line split into two lines, and the proposed changes to nine existing lines meet TriMet's established thresholds for Major Service Changes:

- Line 272 - Airport Bus Line (New)
- Line 31 - Webster Line (New)
- Line 4 - Division/Fessenden
- Line 24 - Fremont
- Line 61 - Marquam Hill/Beaverton
- Line 64 - Marquam Hill/Tigard
- Line 66 - Marquam Hill/Hollywood
- Line 68 - Marquam Hill/Collins Circle
- Line 73 - 122nd Avenue
- Line 79 - Clackamas/Oregon City
- Line 81 - Kane/257th
- Line 96 - Tualatin/I-5

Findings

1. **No system level disparate impact or disproportionate burden** for the 12 major service increases.
2. **A slightly greater percentage** of the District's non-minority population stands to benefit from the proposed service improvements compared to the minority population (20% vs. 19.1%, respectively).
3. The vast majority of improvements are on lines with **average-or-above low-income populations** in their service areas. As a result, a greater share of the region's low-income populations stand to **benefit** as compared to higher income populations.
4. **No disproportionate and adverse effects** from the one major service reduction (Line 79). The minority and low-income populations in this service area are below the disparate impact and disproportionate burden thresholds.

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Attachment A: Analysis of impact on access to employment, education, health care, and food for minority and low-income populations

I. Background

Building upon several years of ongoing service improvements, TriMet's Annual Service Plan for FY2019¹ proposes Major Service Changes to ten bus lines and the addition of two new bus lines. Other changes will involve all night service on several lines, additional peak hour trips on an over-loaded line, and improvements in on-time performance for lines with high ridership but lower current reliability. Though these changes will represent improvements for riders on those lines, they are not large enough changes to be reviewed as Major Service Changes. The Major Service Changes presented here represent the large majority of TriMet's proposed changes for FY19. The TriMet Board's approval of a ten-year payroll and self-employment tax rate increase in 2015 makes the changes possible.

TriMet has engaged the community for the past few years to develop a shared vision for future transit service that will guide how the additional revenue is invested. Each year, TriMet staff will use information developed from the shared vision planning efforts and outreach, updated analyses and measures, and additional outreach to prioritize incremental service improvements for that year. The efforts will focus on five factors defined by the TriMet Board: *demand, productivity, connections, equity, and growth*. Each year's plan will also consider safety, budget availability, and availability of staff and equipment to provide for expanded service.

This report documents the equity analysis conducted for these changes.

II. TriMet Title VI Compliance

As a recipient of Federal Transit Administration ("FTA") financial assistance, TriMet must ensure that service changes – both increases and reductions – comply with Title VI of the Civil Rights Act of 1964, which states:

"No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

The FTA has provided specific implementing guidelines and regulations for complying with Title VI in Circular 4702.1B ("Circular"). The Circular instructs transit agencies to consider impacts of Major Service Changes on low-income populations as well as minority populations by conducting a service equity analysis. Figure 1 shows the general sequence of steps and considerations in the equity analysis process.

TriMet's Title VI Program² outlines the agency's policies, definitions and procedures for complying with Title VI and performing equity analyses. As required by the Circular, this includes the agency's Major Service Change, Disparate Impact, and Disproportionate Burden policies, as set forth below.

¹ Fiscal year 2019 runs from July 1, 2018 to June 30, 2019.

² TriMet's Title VI Program was updated and submitted to FTA in fall 2017

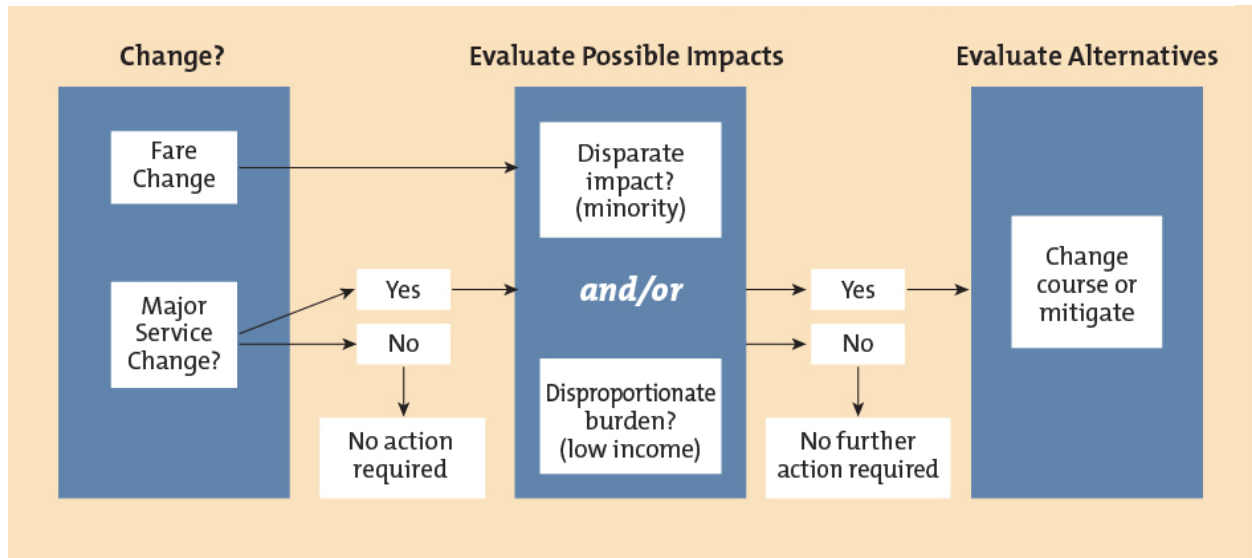
A. Major Service Change Policy

All changes in service meeting the definition of Major Service Change are subject to a Title VI Equity Analysis prior to Board approval of the service change. A Title VI Equity Analysis will be completed for all Major Service Changes and will be presented to the Board for its consideration and included in the subsequent TriMet Title VI Program with a record of action taken by the Board.

A **Major Service Change** is defined as:

1. A change to **15% or more of a line's route miles**. This includes routing changes where route miles are neither increased nor reduced (i.e. re-routes), or;
2. A change of **15% or more to a line's span** (hours) of service on a daily basis for the day of the week for which a change is made, or;

Figure 1: Overview of TriMet's Title VI Equity Analysis process



3. A change of **15% or more to a line's frequency** of service on a daily basis for the day of the week for which a change is made, or;
4. A single transit line is **split** into two or more transit lines, or;
5. A **new transit line** is established.

A Major Service Change occurs whether the above thresholds are met:

- a) Within a single service proposal, or;
- b) Due to a cumulative effect of routing, span, or frequency changes over the three years prior to the analysis

B. Disparate Impact Policy

Testing for Disparate Impact evaluates effects on minority riders or populations as compared to non-minority riders or populations. “Minority” is defined as all persons who identify as being part of racial/ethnic groups besides white, non-Hispanic.

In the course of performing a Title VI Equity Analysis for possible disparate impact, TriMet will analyze how the proposed major service change or fare change action could impact minority populations, as compared to non-minority populations.

In the event the proposed action has an adverse impact that affects protected populations more than other populations at a level that exceeds the benchmarks established in the adopted Disparate Impact Policy, or that restricts the benefits of the service change to protected populations, the finding would be considered as a potential Disparate Impact. Given a potential Disparate Impact, TriMet will evaluate whether there is an alternative that would serve the same objectives and with a more equitable impact. Otherwise, TriMet will take measures to minimize or mitigate the adverse impact of the proposed action.

The Disparate Impact Policy defines measures for determination of potential Disparate Impact on minority populations resulting from Major Service Changes or any change in fares. The policy is applied to both adverse effects and benefits of Major Service Changes. Adverse effects of service changes are defined as:

1. A decrease in the level of transit service (span in days and/or hours, and/or frequency); and/or
2. Decreased access to comparable transit service, which is defined as an increase of the access distance to beyond one-quarter mile of bus stops or one-half mile of rail stations.

The determination of disparate impact associated with service changes is defined separately for impacts of changes on an individual line, and for system-level impacts of changes on more than one line, as well as for both service reductions and service improvements.

1. In the event of potential adverse effects resulting from service reductions:
 - a) A Major Service Change to a *single line* will be considered to have a potential Disparate Impact if the percentage of impacted minority population in the service area of the line exceeds the percentage of minority population of the TriMet District as a whole by at least 3 percentage points (e.g., 31 percent compared to 28 percent).
 - b) To determine the *system-wide* impacts of Major Service Change reductions on more than one line, the percentage of the TriMet district’s minority population that is impacted is compared to the percentage of the TriMet district’s non-minority population that is impacted. If the percentage of the minority population impacted is at least 20 percent greater than the percentage of the non-minority population impacted (e.g., 12 percent compared to 10 percent), the overall impact of changes will be considered disparate.

2. In the event of service improvements:

- a) A major service change to a *single line* will be considered to have a potential Disparate Impact if:
 - i. The improvement is linked to other service changes that have disproportionate and adverse effects on minority populations, or;
 - ii. The percentage of impacted minority population in the service area of the line is less than the percentage of minority population of the TriMet District as a whole by at least 3 percentage points (e.g., 25 percent compared to 28 percent).
 - b) To determine the *system-wide* impacts of major service change improvements on more than one line, the percentage of the TriMet district's minority population that is impacted is compared to the percentage of the TriMet district's non-minority population that is impacted. If the percentage of the minority population impacted is at least 20 percent less than the percentage of the non-minority population impacted (e.g., 8 percent compared to 10 percent), the overall impact of changes will be considered disparate.
3. Additional considerations to complement the quantitative Disparate Impact analysis above may include evaluating impacts to accessing employment, education, food, or health care for minority populations.

Upon determination of Disparate Impact, TriMet will either:

- a) Alter the service proposal to avoid, minimize, or mitigate potential Disparate Impacts, or;
- b) Provide a substantial legitimate justification for keeping the proposal as-is, and show that there are no alternatives that would have a less Disparate Impact on minority riders but would still accomplish the project or program goals.

C. Disproportionate Burden Policy

Testing for Disproportionate Burden evaluates potential effects on low-income riders or populations, defined as at or below 150% of the federal poverty level. The line and system level evaluations are identical to those used to determine potential Disparate Impacts, but compare low-income and higher income populations rather than minority and non-minority populations.

III. Proposed Service Changes

A. Description of Changes

Table 1 lists the proposed service changes by the quarter in which they would take effect. Most changes proposed for the next year are service increases. However, one of the proposed changes (Line 79) include the removal of service to some stops as part of their proposed routing changes.

Table 1: Proposed Service Changes in FY19 Annual Service Plan

Quarter	Line	Service Change Description
Fall 2018	4 - Division/Fessenden	<ul style="list-style-type: none"> ➤ One route between Gresham Transit Center and Downtown Portland ➤ One route between Downtown Portland and St. Johns
	61 - Marquam Hill/Beaverton	<ul style="list-style-type: none"> ➤ Add earlier and later trips during the weekday
	64 - Marquam Hill/Tigard	<ul style="list-style-type: none"> ➤ Add earlier and later trips during the weekday
	66 - Marquam Hill/Hollywood	<ul style="list-style-type: none"> ➤ Add earlier and later trips during the weekday
	68 - Marquam Hill/Collins Circle	<ul style="list-style-type: none"> ➤ Add earlier and later trips during the weekday
	73 - 122nd Avenue	<ul style="list-style-type: none"> ➤ Increase weekday midday frequency.
	81 - Kane/257th	<ul style="list-style-type: none"> ➤ Increase weekday peak frequency ➤ Add earlier and later trips during the weekday
	96 - Tualatin/I-5	<ul style="list-style-type: none"> ➤ Add midday service between Tualatin and Downtown Portland
	272 - Airport Bus Line (New)	<ul style="list-style-type: none"> ➤ New line connecting Burnside Street via 82nd Avenue to Portland International Airport
Spring 2019	24 - Fremont	<ul style="list-style-type: none"> ➤ Extend route over the Fremont Bridge to NW Portland and Goose Hollow in SW Portland ➤ Increase weekday frequency ➤ Add weekend service
	31 - Webster Line (New)	<ul style="list-style-type: none"> ➤ New line connecting Clackamas Town Center and Oregon City Transit Center
	79 - Clackamas/Oregon City	<ul style="list-style-type: none"> ➤ Change route to 82nd Avenue, I-205, and Washington Street ➤ Eliminate service on Strawberry Lane

Note: The FY19 Annual Service Plan also includes some minor changes to several bus lines (17, 20, 35, 56, 57, and 94) for the purpose of addressing reliability and capacity issues. These changes are not included in this analysis because they are too small to reach the Major Service Change threshold.

B. Major Service Change Test

To determine whether individual service changes meet the definition of Major Service Change, current and proposed service are compared in terms of route length, frequency, and span (hours) of service. Changes of 15% or more qualify as Major Service Changes, including changes meeting this threshold cumulatively over the course of three years.

Results of the comparison are shown in Table 2. To summarize, these changes meet TriMet's adopted Title VI Major Service Change definition:

Line 4 – Division/Fessenden: Split line

Line 24 – Fremont: Route length change of over 15%; Frequency increase of over 15% on weekdays; New weekend service

Line 31 – Webster: New bus line

Line 61 – Marquam Hill/Beaverton: Change in span of over 15% on weekdays

Line 64 – Marquam Hill/Tigard: Change in span of over 15% on weekdays

Line 66 – Marquam Hill/Hollywood: Change in span of over 15% on weekdays

Line 68 – Marquam Hill/Collins Circle: Change in span of over 15% on weekdays

Line 73 – 122nd Avenue: Frequency increase of over 15% on weekdays

Line 79 – Clackamas/Oregon City: Route length change of over 15%

Line 81 – Kane/257th: Frequency increase of over 15% on weekdays; Change in span of over 15% on weekdays

Line 96 – Tualatin/I-5: Frequency increase of over 15% on weekdays

Line 272 – Airport Bus: New bus line

Table 2: Results of Major Service Change Test by Line

Line	Change in Route Length	Change in Span	Change in Frequency	Line Split	New Line or New Service
Line 272 - Airport Bus					✓
Line 31 - Webster					✓
Line 4 - Division/Fessenden				✓	
Line 24 - Fremont	+61%				
Line 24 - Fremont (Weekday)			+114%		
Line 24 - Fremont (Saturday)					✓
Line 24 - Fremont (Sunday)					✓
Line 61 - Marquam Hill/Beaverton		+38%			
Line 64 - Marquam Hill/Tigard		+37%			
Line 66 - Marquam Hill/Hollywood		+33%			
Line 68 - Marquam Hill/Collins Circle		+27%			
Line 73 - 122nd Avenue (Weekday)			+27%		
*Line 79 - Clackamas/Oregon City	+36% -59%				
Line 81 - Kane/257th (Weekday)			+160%	+49%	
Line 96 - Tualatin/I-5		+33%			

*Proposed routing changes include both removing and adding portions to Line 79.

C. Line-level Analyses

Having identified the service changes which meet the definition of Major Service Change, the next step in the analysis is to look at each line individually to determine potential Disparate Impacts (minority populations) and/or Disproportionate Burdens (low-income populations). Both service reductions and service increases are analyzed. For service reductions, the analysis examines whether *adverse effects* are disproportionately borne by minority and/or low-income populations. On the other hand, for service increases the analysis examines the extent to which the *benefits* of the improvements are inclusive of minority and low-income populations.

The line-level analysis compares minority and low-income populations for the service area of each line proposed for a Major Service Change to the minority and low-income populations of the TriMet District as a whole. The analysis is separated by type of service change being proposed:

1. Major Service Reduction
2. Major Service Increases
3. Other Major Service Changes

1. Major Service Reduction

For service reductions the analysis examines whether *adverse effects* (defined on pg. 3) are disproportionately borne by minority or low-income populations. If *adverse effects* are identified and a line's minority and/or low-income populations are at least 3 percentage points greater than the minority or low-income populations for the TriMet District as a whole, the proposed change is flagged as a potential Disparate Impact or Disproportionate Burden.

The proposal for the Line 79 includes the only Major Service Reduction in this service plan.

➤ *Line 79 (Route streamlining, including stop removals)*³

The Line 79 route change would improve connections between Oregon City Transit Center and Clackamas Town Center. Doing so would remove Line 79 service from a total of 9 stops, including both directions of service. Seven of these stops (which serve 40 out of the 44 daily ons/off) have comparable service within ¼ mile, and the population in the surrounding area is **17% minority** and **20% low-income**, as shown in Figures 2 and 3. Thirty-six of the current stops served by Line 79, along Webster, Oatfield, E. Dartmouth, W. Arlington, and McLoughlin Blvd, will be served by the new Webster Line.

Two stops, where the remaining 4 daily ons/off occur, do not have comparable service within ¼ mile, thereby meeting the definition of *adverse effect* (see Table 3). The population in the area surrounding these stops is **15% minority** and **16% low-income**, which are below the Disparate Impact threshold (31%) and Disproportionate Burden threshold (27%) for Major Service Reductions. Thus, there is *no Disparate Impact* and *no Disproportionate Burden*.

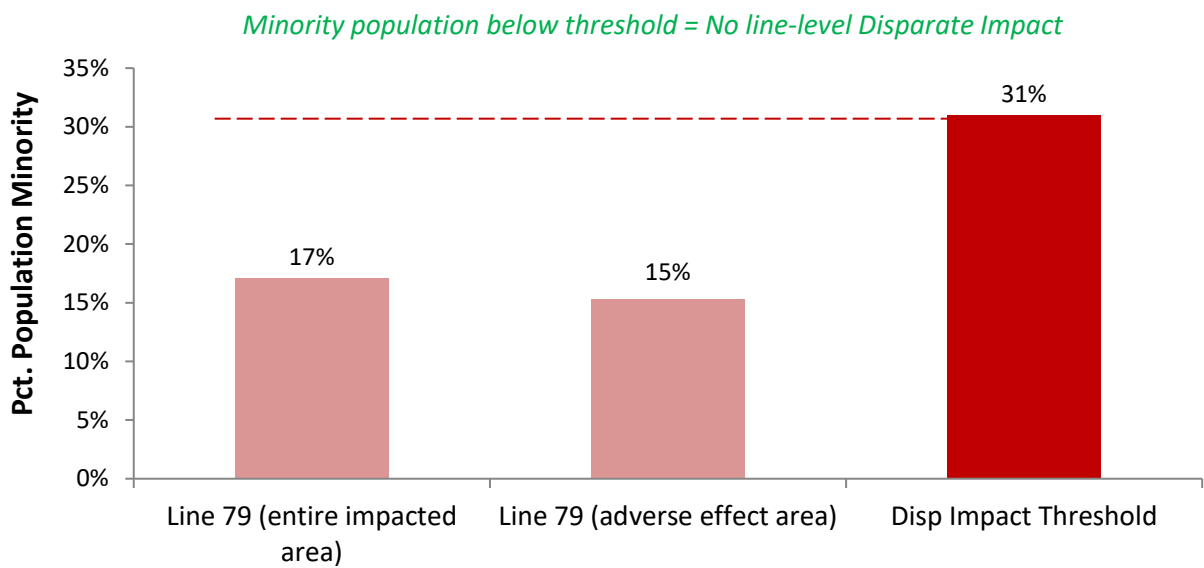
³ This section only analyzes the service reduction component of the Line 79 service change proposal. The analysis of the service increase component is provided in the next section.

Table 3: Stops and populations impacted by routing changes to Line 79

	No. of Stops	Total daily ons/off (weekdays)	Pct. Population Minority	Pct. Population Low-Income
Service Removed	9	44	17%	20%
<i>Nearest comparable service</i>				
Less than ¼ mile	7	40	17%	20%
Over ¼ mile*	2	4	15%	16%

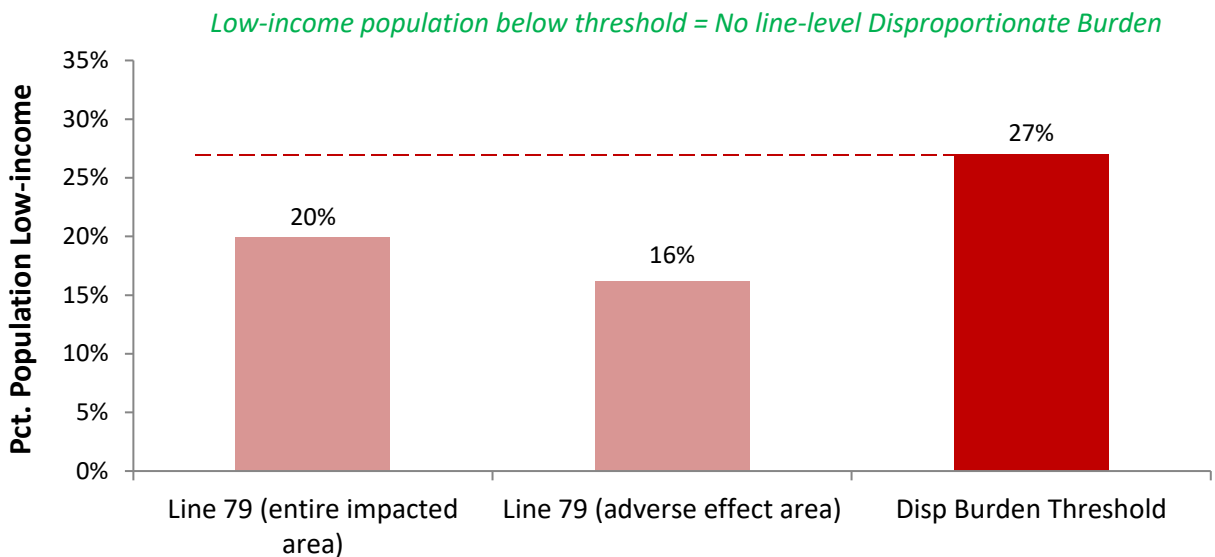
*Adverse effect applies

Figure 2: Minority Population Comparison
Proposed Line 79 (Coverage Removed) Major Service Reduction



Source: 2011-2015 American Community Survey, block group level

Figure 3: Low-income Population Comparison
Proposed Line 79 Major Service Reduction



Source: 2011-2015 American Community Survey, block group level. Low-income defined as at or below 150% federal poverty level.

In terms of access⁴, this change would remove service from:

- About 7,626 jobs
 - 62% are low-to-medium wage jobs, which is higher than the TriMet district average
 - 9% are jobs held by people of color, which is lower than the TriMet district average
 - 8% are jobs held by Hisp/Latino workers, which is similar to the TriMet district average

2. Major Service Increases

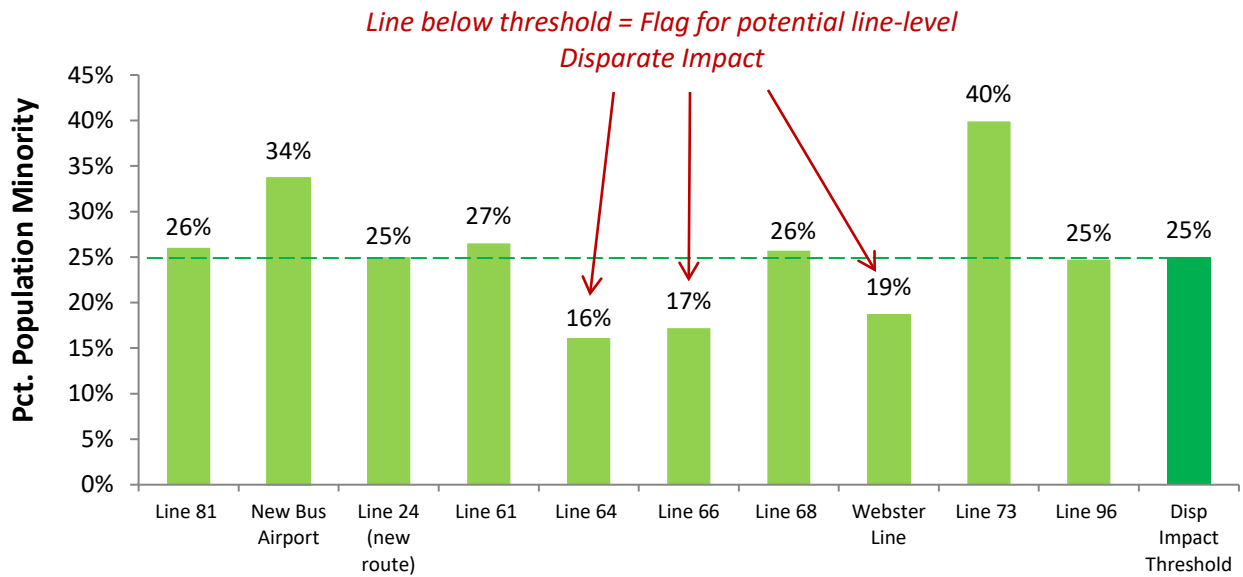
For service increases, the analysis examines the extent to which the *benefits* of the improvements are inclusive of minority and low-income populations.

Figure 4 displays the minority population along each line⁵ proposed for a major increase as compared to the 25% Disparate Impact threshold. Figure 5 displays the low-income population along each line as compared to the 21% Disproportionate Burden threshold. Because these are proposed service increases, protected populations *falling below* these thresholds are flagged for potential concerns. The narrative analysis of each individual line follows, which includes further considerations of access to jobs, education, health care, and food for minority and low-income populations.

⁴ Access defined as within ¼ mile of a stop on the line. For full details of access to services by line, see Attachment B.

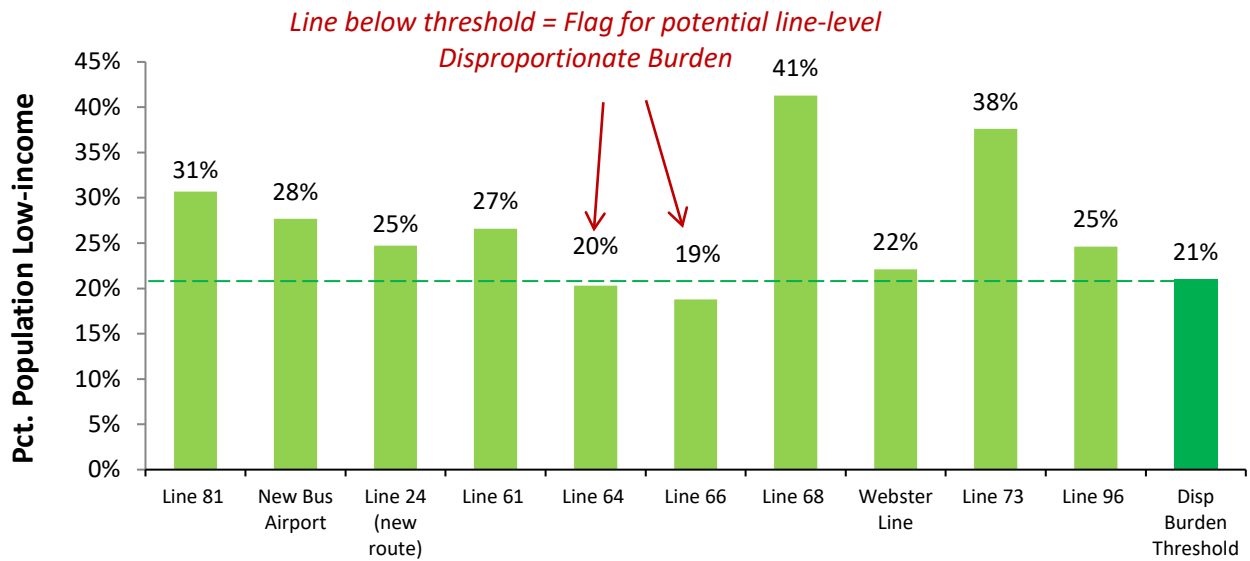
⁵ Line 79 shown separately for clarity.

Figure 4: Minority Population Comparison
 Lines with proposed Major Service Increases & Disparate Impact Threshold



Source: 2011-2015 American Community Survey, block group level

Figure 5: Low-income Population Comparison
 Lines with proposed Major Service Increases & Disproportionate Burden Threshold



Source: 2011-2015 American Community Survey, block group level.
 Low-income defined as at or below 150% federal poverty level.

➤ **Line 272 – Airport Bus** (New bus line)

The proposed routing for this line would potentially benefit a service area population that is **33% minority** and **32% low-income** which are both well above the Disparate Impact (25%) and Disproportionate Burden (21%) thresholds for Major Service Increases. Thus, there is *no Disparate Impact* and *no Disproportionate Burden* at the line-level.

In terms of access, this line would provide new service to:

- About 31,000 jobs
 - 64% are low-to-medium wage jobs, which is much greater than the TriMet district average
 - 12% are jobs held by people of color, which is equal to the TriMet district average
 - 9% are jobs held by Hispanic/Latino workers, which is slightly greater than the TriMet district average
- 4 employment and housing resource centers
- 3 high school
- 1 community health care service centers
- 4 grocery stores and supermarkets, two of which are Asian grocers

➤ **Line 31 – Webster** (New bus line)

The proposed routing for this line would potentially benefit a service area population that is **19% minority** and **22% low-income**, which are both well below the Disparate Impact (25%) and Disproportionate Burden (21%) thresholds for Major Service Increases. This indicates a potential Disparate Impact and Disproportionate Burden, calling for further examination, in particular the considerations below as well as the system-level analysis provided in the next section.

In terms of access, this line would maintain service⁶ to:

- Over 18,992 jobs
 - 64% are low-to-medium wage jobs, which is greater than the TriMet district average
 - 11% are jobs held by minorities, which is slightly less than the TriMet district average
 - 8% are jobs held by Hisp/Latino workers, which is similar to the TriMet district average
- 2 community college
- 2 middle school and 2 high schools, including 1 alternative high schools
- 4 community health care service centers
- 5 grocery stores/supermarkets

In terms of access, this line would provide new service to:

- Over 1,297 jobs
 - 68% are low-to-medium wage jobs, which is greater than the TriMet district average
 - 8% are jobs held by minorities, which is less than the TriMet district average
 - 8% are jobs held by Hisp./Latino workers, which is similar to the TriMet district average
- 1 grocery store/supermarket

⁶ Stops removed from Line 79 will be maintained by the New Webster line

➤ **Line 79 – Clackamas/Oregon City (Route change)**

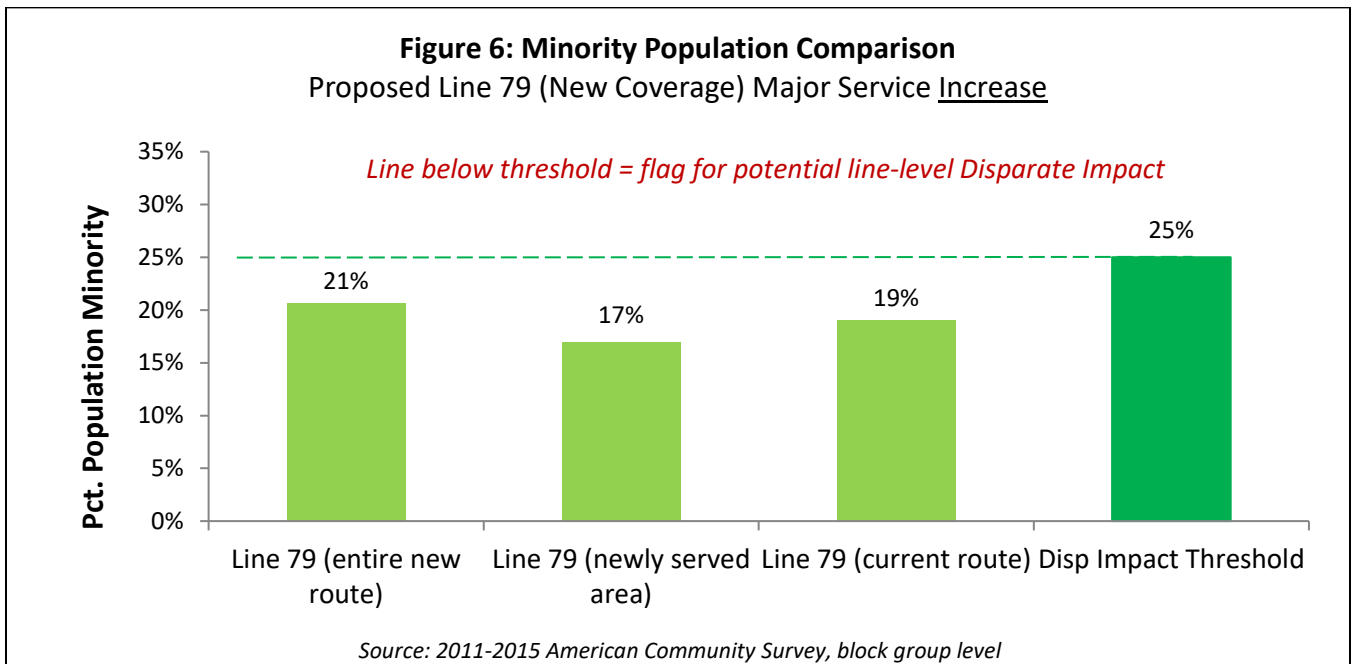
The Line 79 proposal includes a route change that will serve a new area on the entire new line. As shown in Figure 6, the entire new line has a population that is 21% **minority** which is below the Disparate Impact threshold (25%) for Major Service Increases. This indicates a **potential Disparate Impact**, calling for further examination, in particular the considerations below as well as the system-level analysis provided in the next section. On the other hand, the newly served area population (see Figure 7) is **26% low-income**, which is above the Disproportionate Burden threshold (21%) for Major Service Increases. Thus, there is **no Disproportionate Burden** at the line level.

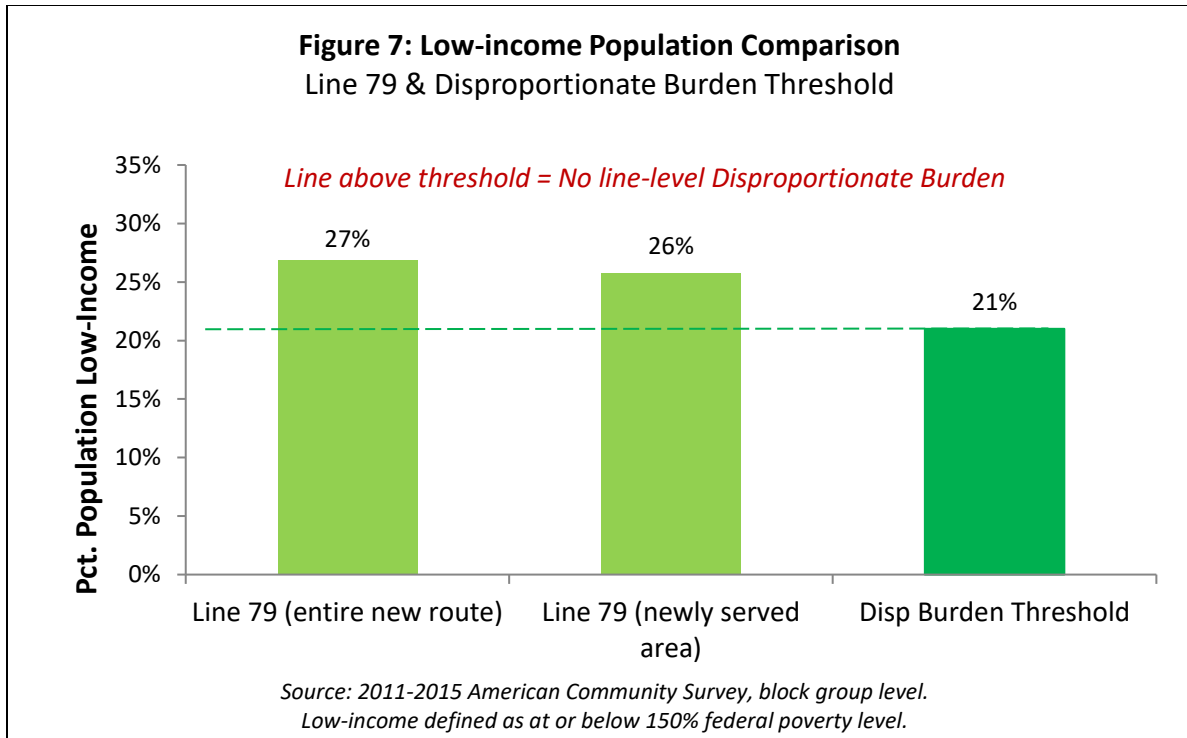
In terms of access, the route change would provide new service to:

- About 462 jobs
 - 66% are low-to-medium wage jobs, which is much greater than the TriMet district average
 - 4% are jobs held by minorities, which is less than the TriMet district average
 - 7% are jobs held by Hisp/Latino workers, which is lower than the TriMet district average
- 1 grocery stores/supermarkets
- 2 human and social services centers

In terms of access, this line would improve service to:

- About 33,940 jobs
 - 62% are low-to-medium wage jobs, which is much greater than the TriMet district average
 - 8% are jobs held by minorities, which is less than the TriMet district average
 - 10% are jobs held by Hisp/Latino workers, which is above the TriMet district average
- 3 employment resource center
- 5 human and social services centers
- 4 grocery stores/supermarkets, including one Asian grocer





➤ **Line 96 – Tualatin/I-5** (Weekday frequency increase)

This service increase would potentially benefit a service area population that is **25% minority** and **25% low-income**, which are at or above the Disparate Impact and Disproportionate Burden thresholds for Major Service Increases. Thus, there is **no Disparate Impact** and **Disproportionate Burden** at the line level.

The frequency increase would improve service to:

- Over 99,000 jobs
 - 48% are low-to-medium wage jobs, which is less than the TriMet district average
 - 11% are jobs held by minorities, which is slightly less than the TriMet district average
 - 7% are jobs held by Hisp./Latino workers, which is slightly less than the TriMet district average
- 6 high schools, 5 of which are private
- 11 grocery stores/supermarkets
- 12 human and social services centers
- 2 employment resource centers

➤ **Line 81 – Kane/257th** (Weekday frequency increase and span improvements)

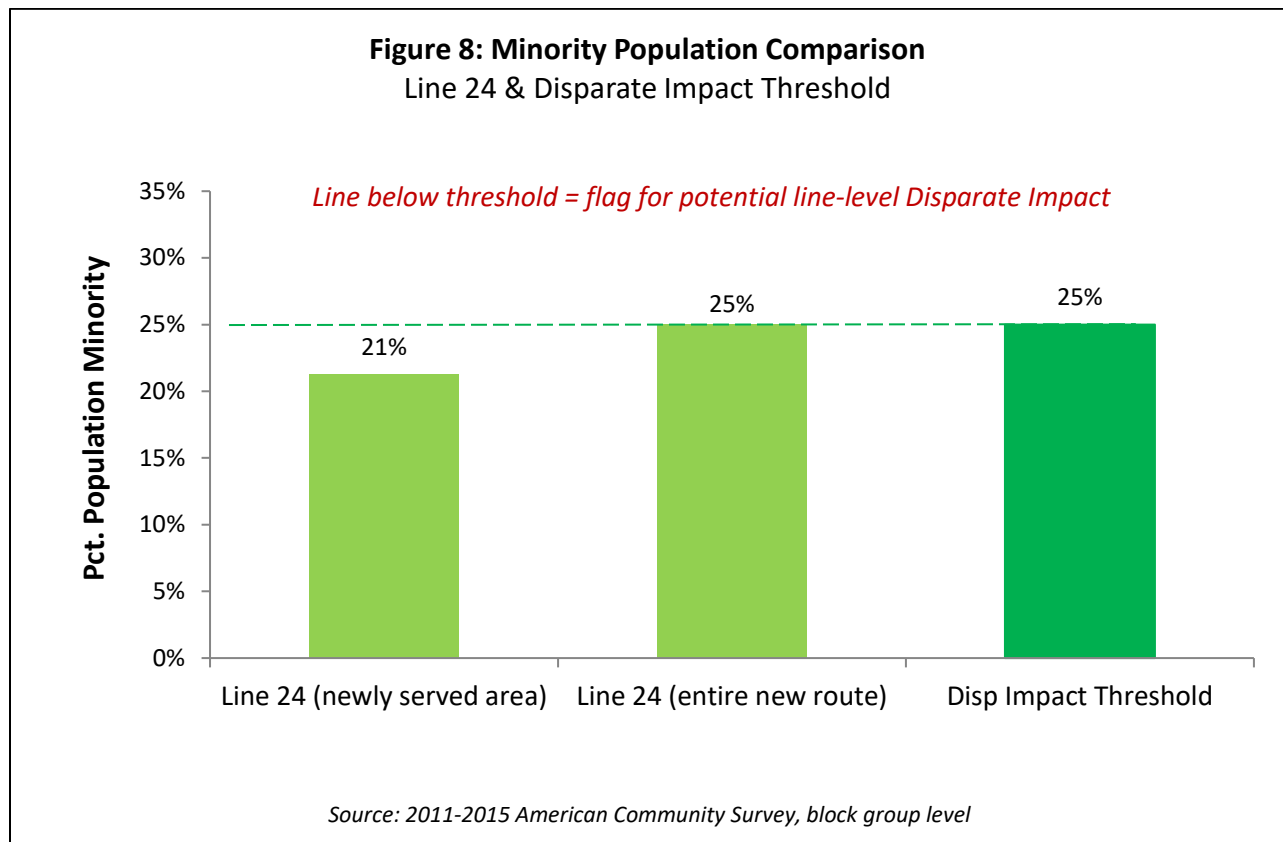
This service increase would potentially benefit a service area population that is **26% minority** and **31% low-income**, which are above the Disparate Impact and Disproportionate Burden thresholds for Major Service Increases. Thus, there is **no Disparate Impact** and **Disproportionate Burden** at the line level.

The frequency increase would improve service to:

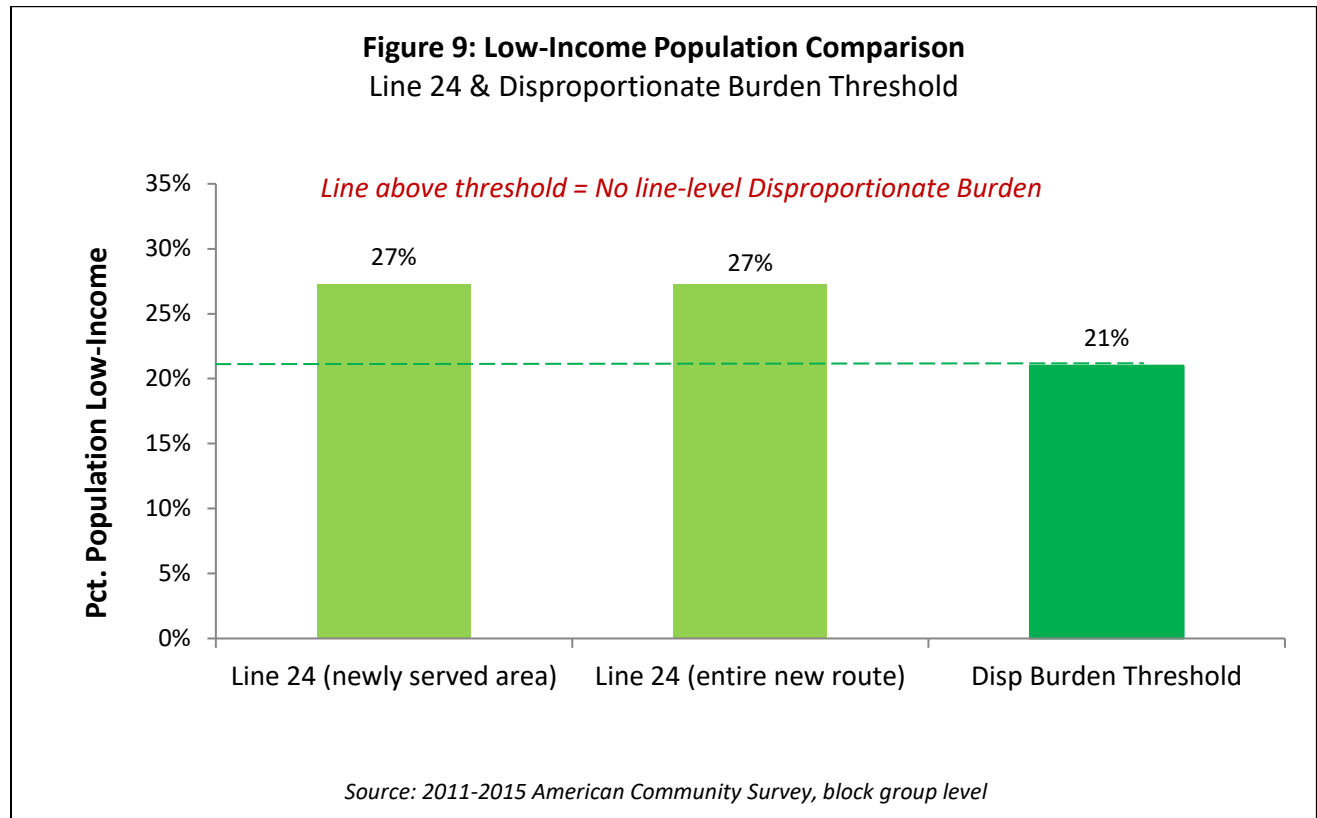
- About 17,675 jobs
 - 66% are low-to-medium wage jobs, which is above the TriMet district average
 - 12% are jobs held by minorities, which is similar to the TriMet district average
 - 9% are jobs held by Hisp./Latino workers, which is above the TriMet district average
- 1 community college and 3 high schools
- 5 grocery stores/supermarkets
- 4 human and social services centers

➤ **Line 24** (Route extended and frequency increase)

The Line 24 proposal includes both a route change that will serve a new area and a frequency increase on the entire new line. As shown in Figure 6, the entire new line has a population that is **25% minority**, which is equal to the Disparate Impact threshold for Major Service Increases (25%). On the other hand, the area that would be newly served by the route change to the Line 24 has a population that is **21% minority**, which is below the Disparate Impact threshold for Major Service Increases (25%). This indicates a **potential Disparate Impact**, calling for further examination, in particular the considerations below as well as the system-level analysis provided in the next section.



As shown in Figure 9, the entire new line has a population that is **27% low-income**, while the area that would be newly served by the route change to the Line 24 has a population that is **27% minority**. Both of these are above the Disproportionate Burden threshold for Major Service Increases (21%). Thus, there is **no Disproportionate Burden** at the line-level.



Thus, there is no **potential Disproportionate Burden** related to the route change or increase in frequency. However, there is a **potential Disparate Impact** related to the route change, calling for further examination, in particular the considerations below as well as the system-level analysis provided in the next section.

In terms of access, the route change would provide new service to:

- About 26,396 jobs
 - 50% are low-to-medium wage jobs, which is less than the TriMet district average
 - 11% are jobs held by minorities, which is slightly less than the TriMet district average
 - 6% are jobs held by Hisp/Latino workers, which is lower than the TriMet district average
- 3 high schools, including 2 private high schools
- 8 grocery stores/supermarkets
- 6 human and social services centers

The frequency increase would improve service to:

- About 39,378 jobs
 - 53% are low-to-medium wage jobs, which is less than the TriMet district average

- 12% are jobs held by minorities, which is equal to the TriMet district average
- 6% are jobs held by Hisp/Latino workers, which is lower than the TriMet district average
- 4 employment resource centers
- 4 human and social services centers
- 7 grocery stores/supermarkets, including one Asian grocer

➤ **Line 73 – 122nd Avenue** (Weekday frequency increase)

This service increase would potentially benefit a service area population that is **40% minority** and **38% low-income**, which are well above the Disparate Impact and Disproportionate Burden thresholds for Major Service Increases. Thus, there is **no Disparate Impact** and **Disproportionate Burden** at the line level.

The frequency increase would improve service to:

- About 14,166 jobs
 - 74% are low-to-medium wage jobs, which is well above the TriMet district average
 - 14% are jobs held by minorities, which is above the TriMet district average
 - 9% are jobs held by Hisp./Latino workers, which is above the TriMet district average
- 1 community college campus
- 2 middle schools and 1 high school
- 4 grocery stores/supermarkets
- 3 human and social services centers

➤ **Line 61 – Marquam Hill/Beaverton** (Weekday span improvements)

This service increase would potentially benefit a service area population that is **27% minority** and **27% low-income**, both of which exceed the Disparate Impact (25%) and Disproportionate Burden (21%) thresholds for Major Service Increases. Thus, there is **no Disparate Impact** and **no Disproportionate Burden** at the line-level.

In terms of access, this increase would improve service to:

- About 40,000 jobs
 - 47% are low-to-medium wage jobs, which is less than the TriMet district average
 - 15% are jobs held by minorities, which is greater than the TriMet district average
 - 6% are jobs held by Hisp./Latino workers, which is less than the TriMet district average
- 10 grocery stores/supermarkets, including one Asian grocer
- 7 community health care service centers
- 1 employment resource center
- 1 middle school and 2 high schools

➤ **Line 64 – Marquam Hill/Tigard** (Weekday span improvements)

This service increase would potentially benefit a service area population that is **16% minority** and **20% low-income**, both of which are below the Disparate Impact (25%) and Disproportionate Burden (21%) thresholds for Major Service Increases. This indicates a **potential Disparate Impact and Disproportionate**

Burden, calling for further examination, in particular the considerations below as well as the system-level analysis provided in the next section.

In terms of access, this increase would improve service to:

- About 45,000 jobs
 - 47% are low- to-medium wage jobs, which is less than the TriMet district average
 - 15% are jobs held by people of color, which is greater than the TriMet district average
 - 7% are jobs held by Hisp/Latino workers, which is less than the TriMet district average
- 2 high schools
- 5 human and social services centers
- 7 grocery stores/supermarkets, including 1 Mediterranean grocer

➤ **Line 66 – Marquam Hill/Hollywood** (Weekday span improvements)

This service increase would potentially benefit a service area population that is **17% minority** and **19% low-income**, both of which are below the Disparate Impact (25%) and Disproportionate Burden (21%) thresholds for Major Service Increases. This indicates a ***potential Disparate Impact and Disproportionate Burden***, calling for further examination, in particular the considerations below as well as the system-level analysis provided in the next section.

In terms of access, this increase would improve service to:

- About 49,000 jobs
 - 45% are low- to-medium wage jobs, which is less than the TriMet district average
 - 14% are jobs held by people of color, which is greater than the TriMet district average
 - 6% are jobs held by Hisp/Latino workers, which is less than the TriMet district average
- 1 employment resource center
- 1 high school
- 8 community health care service centers
- 3 human and social services centers
- 10 grocery stores/supermarkets

➤ **Line 68 – Marquam Hill/Beaverton** (Weekday span improvements)

This service increase would potentially benefit a service area population that is **26% minority** and **41% low-income**, both of which exceed the Disparate Impact (25%) and Disproportionate Burden (21%) thresholds for Major Service Increases. Thus, there is ***no Disparate Impact*** and ***no Disproportionate Burden*** at the line-level.

In terms of access, this increase would improve service to:

- About 42,000 jobs
 - 39% are low-to-medium wage jobs, which is less than the TriMet district average
 - 15% are jobs held by minorities, which is greater than the TriMet district average
 - 5% are jobs held by Hisp./Latino workers, which is less than the TriMet district average
- 3 high schools

- 2 alternative/trade schools
- 2 grocery store/supermarkets
- 8 human and social services centers

3. Other Major Service Changes

One of the proposed changes, while qualifying as a Major Service Changes, does not necessarily increase or reduce service. Evaluating potential distribution of adverse effects or benefits of the changes is not applicable, and therefore there is *no potential Disparate Impact* and *no potential Disproportionate Burden* under TriMet’s Title VI policies. Even so, TriMet still analyzed the details of the proposed changes for potential equity impacts.

➤ **Line 4 – Division/Fessenden (Line split)**

The Line 4 is proposed to be split into two lines and would share stops Downtown Portland. The first segment of the route would run between St. Johns and Downtown Portland and the second segment would run between Downtown Portland and the Gresham Transit Center. There would be no service increase or reduction after the split.

As shown in Figures 10 and 11, the service area for each route segment have minority and low-income populations well above average for the TriMet district. Thus, there is *no Disparate Impact* and *no Disproportionate Burden* at the line-level.

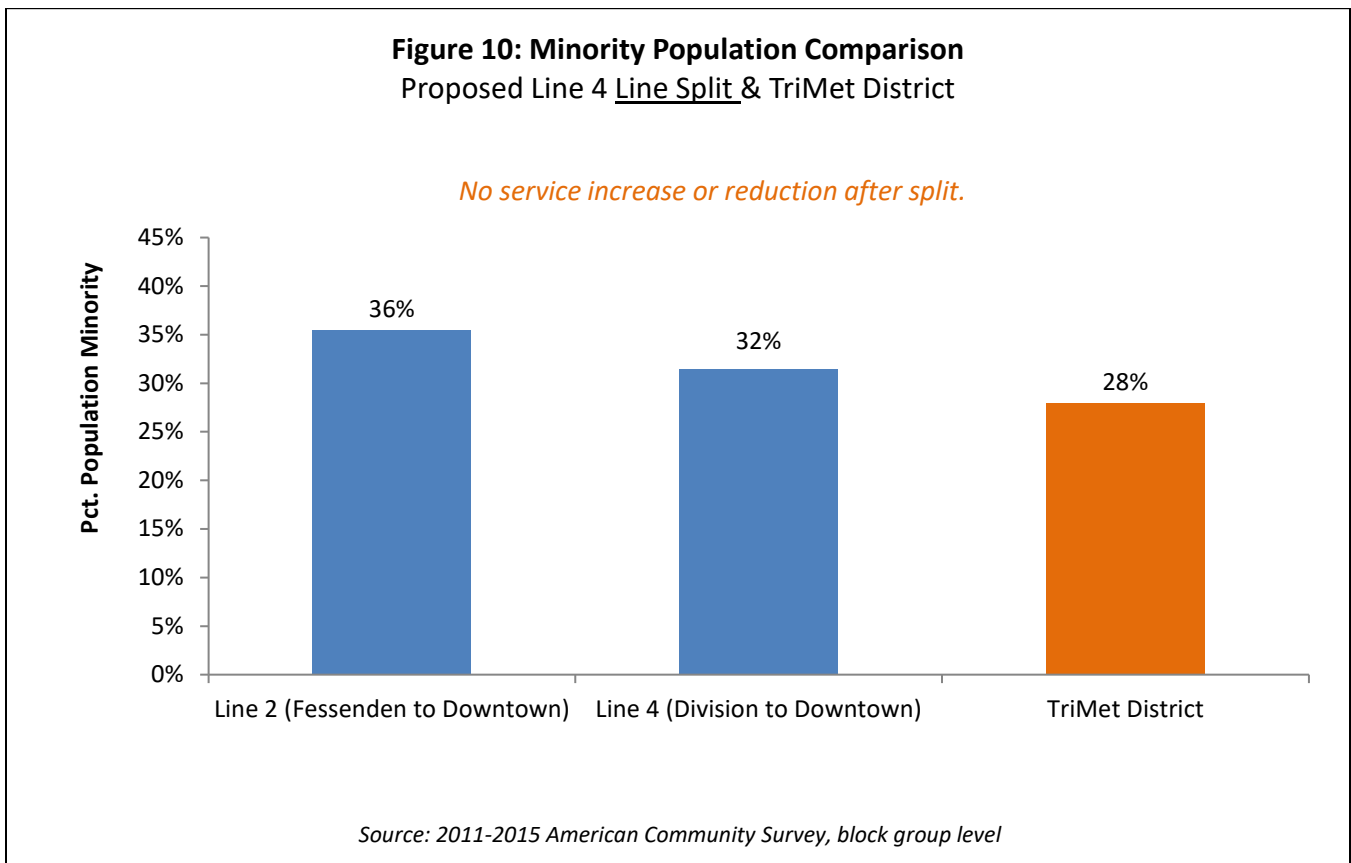
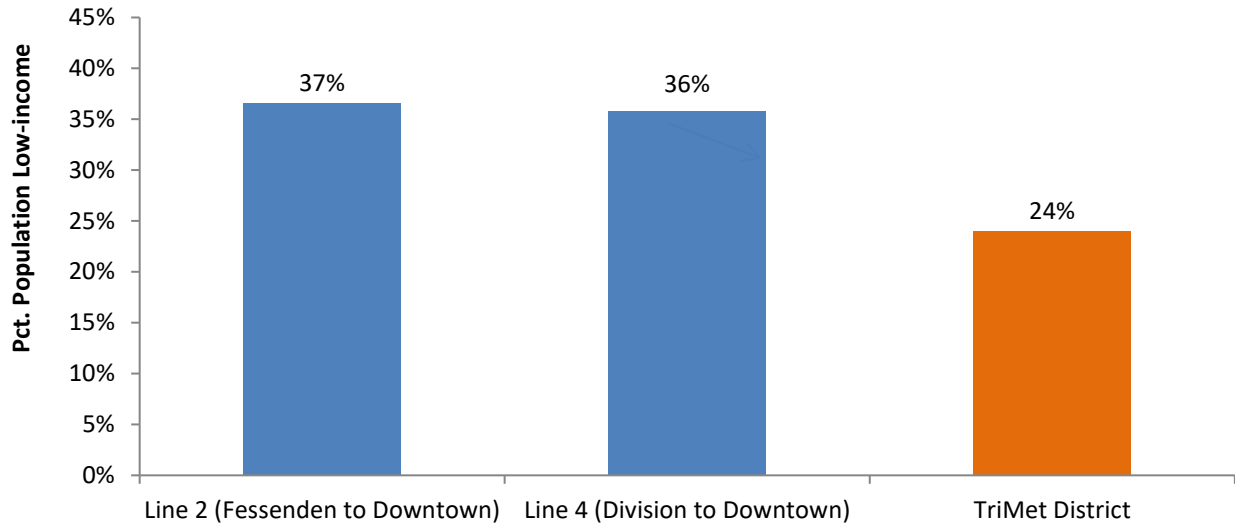


Figure 11: Low-income Population Comparison
Proposed Line 4 Line Split & TriMet District

No service increase or reduction after split.



Source: 2011-2015 American Community Survey, block group level. Low-income defined as at or below 150% federal poverty level.

D. System-level Analysis

Because more than one line is proposed for a Major Service Change, a system-level analysis is required in addition to the line-level analysis. The system-level analysis aims to measure impacts of all Major Service Changes combined to determine how equitable the impacts would be across racial/ethnic and economic lines. Service increases and service reductions are analyzed separately in order to examine both potential system-level *adverse effects* and distribution of *benefits*.

➤ ***System-level Disparate Impact Analysis: Major Service Increases***

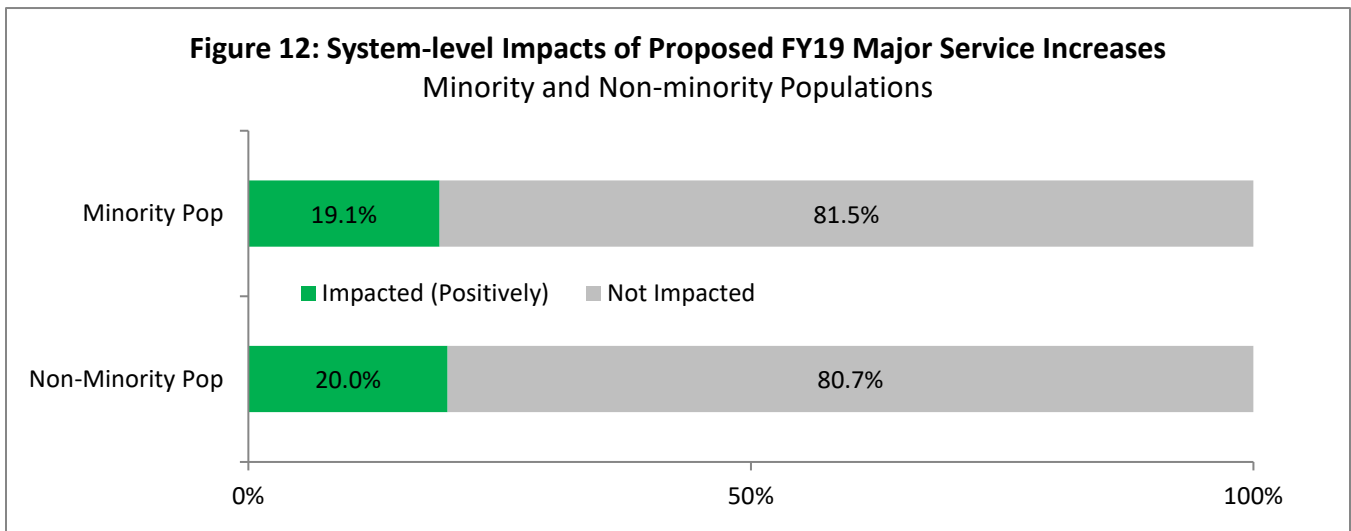
The system-level Disparate Impact analysis of Major Service Increases is completed by determining what portion of the TriMet District’s minority population stands to benefit from the Major Service Change improvements, and comparing that to the portion of the District’s non-minority population that potentially benefits. A potential Disparate Impact would exist if minority populations benefitted substantially less than non-minority populations. The way we measure this is to test whether 20% less (or 4/5) of the District’s minority than non-minority population stood to benefit from the improvements.

Table 4 and Figure 12 compare the positively impacted minority and non-minority populations. A slightly greater percentage of the District’s non-minority population stands to benefit by the proposed Major Service Increase compared to the minority population (20% vs. 19.1%, respectively). However, the difference does not meet the Disparate Impact Threshold of 16%: given the 20% of the non-minority population will benefit from the increases, the percentage of the minority population impacted would have to be at least 16% to meet the definition of a system-level Disparate Impact. Therefore, *no System-level Disparate Impact* is found related to the proposed Major Service Increases.

Table 4: System-level Disparate Impact Analysis of Major Service Increases

Pct. of TriMet District Non-Minority Pop Positively Impacted	Minority Pop Disparate Impact Threshold	Pct. of TriMet District Minority Pop Positively Impacted	Potential Disparate Impact?
20%	Less than 16%	19.1%	No

Figure 12: System-level Impacts of Proposed FY19 Major Service Increases
Minority and Non-minority Populations



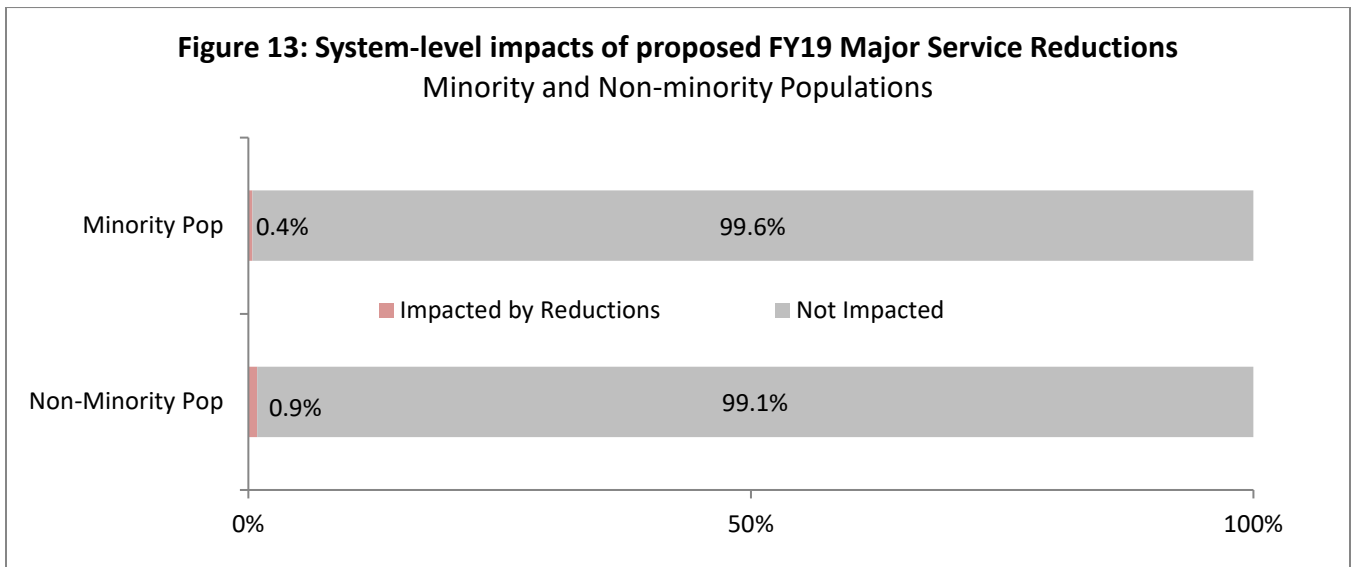
➤ **System-level Disparate Impact Analysis: Major Service Reductions**

The system-level Disparate Impact analysis of Major Service Reductions is completed by determining what proportion of the TriMet District’s minority population is potentially adversely impacted from the service reductions and comparing that to the District’s non-minority population that may be adversely impacted. A potential Disparate Impact would exist if minority populations were impacted substantially more by service reductions than non-minority populations. The way we measure this is to test whether 20% more of the District’s minority than non-minority population were impacted by the service reductions.

Table 5 and Figure 13 compare the impacted minority and non-minority populations. A greater percentage of the District’s non-minority population is potentially impacted by the proposed Major Service Reductions as compared to the minority population (0.9% vs. 0.4%, respectively). Therefore, *no System-level Disparate Impact* is found related to the proposed Major Service Reductions.

Table 5: System-level Disparate Impact Analysis of Major Service Reductions

Pct. of TriMet District Non-Minority Pop Impacted	Minority Pop Disparate Impact Threshold	Pct. of TriMet District Minority Pop Impacted	Potential Disparate Impact?
0.9%	Greater than 1%	0.4%	No



➤ ***System-level Disproportionate Burden Analysis: Major Service Increases***

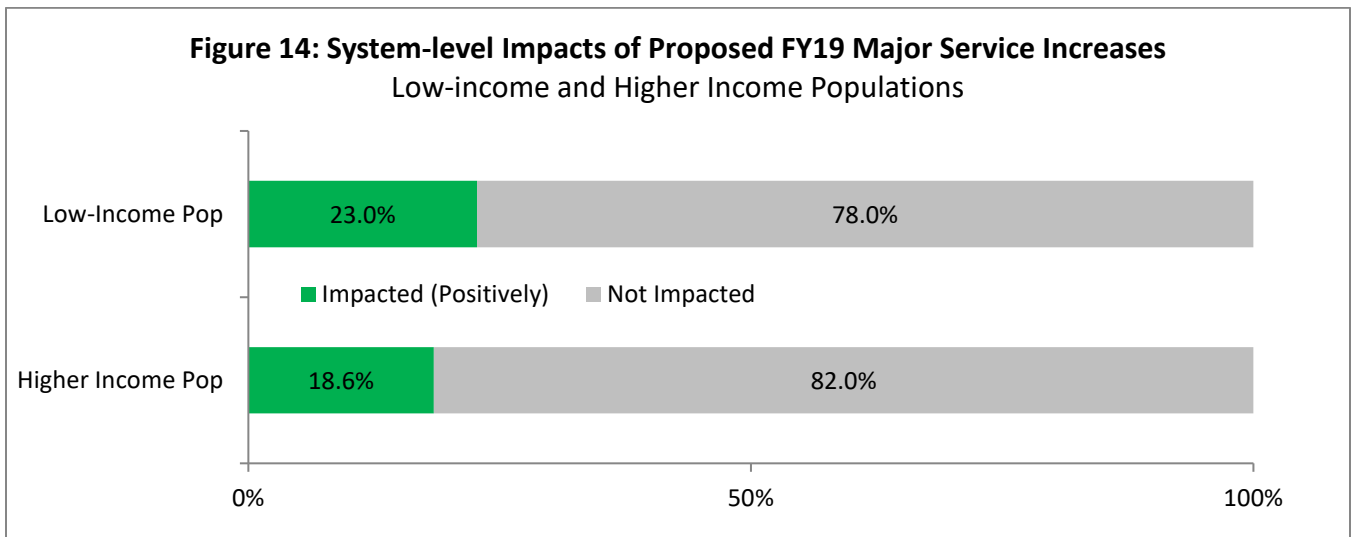
The System-level Disproportionate Burden analysis is completed by determining what proportion of the TriMet District’s low-income population is positively impacted by the Major Service Increases, and comparing that to the District’s higher income population that is positively impacted. “Higher income” includes all persons above the low-income threshold of 150% of the federal poverty level. A potential Disproportionate Burden would exist if low-income populations benefitted substantially less than higher income populations. The way we measure this is to test whether 20% less (or 4/5) of the District’s low-income than higher income population stands to benefit from the improvements.

Table 6 and Figure 14 compare the impacted low-income and higher income populations. A greater percentage of the District’s low-income population stands to benefit from the proposed Major Service Increases as compared to the higher income population (23% vs. 18.6%, respectively). Therefore, ***no System-level Disproportionate Burden*** is found related to the proposed Major Service Increases.

Table 6: System-level Disproportionate Burden Analysis of Major Service Increases

Pct. of TriMet District Higher Income Pop Positively Impacted	Low-Income Pop Disparate Impact Threshold	Pct. of TriMet District Low Income Pop Positively Impacted	Potential Disproportionate Burden?
18.6%	Less than 15%	23%	No

Figure 14: System-level Impacts of Proposed FY19 Major Service Increases
Low-income and Higher Income Populations



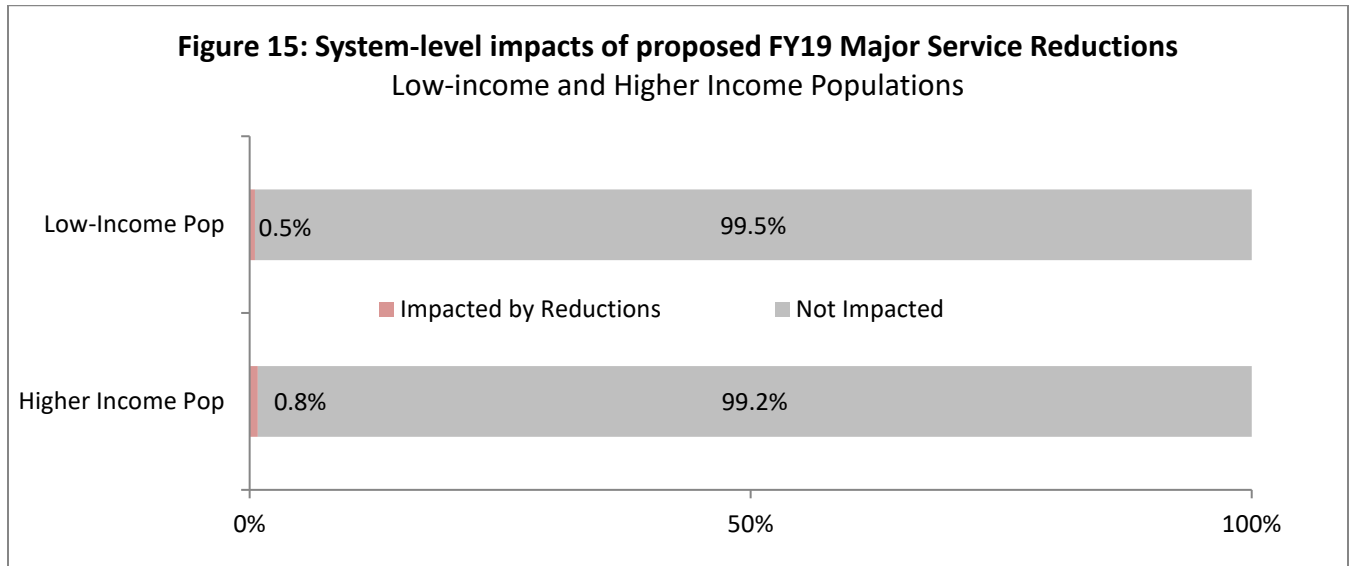
➤ **System-level Disproportionate Burden Analysis: Major Service Reductions**

The system-level Disproportionate Burden analysis is completed by determining what proportion of the TriMet District’s low-income population is potentially adversely impacted from the service reductions and comparing that to the District’s higher income population that may be adversely impacted. “Higher income” includes all persons above the low-income threshold of 150% of the federal poverty level. A potential Disproportionate Burden would exist if low-income populations were impacted substantially more by service reductions than higher income populations. The way we measure this is to test whether 20% more of the District’s low-income than higher income population were impacted by the service reductions.

Table 7 and Figure 15 compare the impacted low-income and higher income populations. A greater percentage of the District’s higher income population is potentially impacted by the proposed Major Service Reductions as compared to the low-income population (0.8% vs. 0.5%, respectively). Therefore, **no system-level Disparate Impact** is found related to the proposed Major Service Reductions.

Table 7: System-level Disproportionate Burden Analysis of Major Service Reductions

Pct. of TriMet District Higher Income Pop Positively Impacted	Low-Income Pop Disparate Impact Threshold	Pct. of TriMet District Low Income Pop Positively Impacted	Potential Disproportionate Burden?
0.8%	Greater than 0.96%	0.5%	No



IV. Community Engagement

The service proposals analyzed in this report stem from a multi-year planning and outreach process to develop a vision for future transit service in the Portland metropolitan region. Divided by sub-region of the TriMet service district, these “Service Enhancement Plans” were undertaken to identify and prioritize opportunities to improve bus service as well as pedestrian and bike access to transit, given current and projected population and job growth. These are long-range plans which include dozens of bus service improvements beyond those proposed for implementation over the next year.⁷

An initial FY19 service plan was developed in fall 2017, at which point TriMet posted the proposed changes on trimet.org to solicit feedback, placed advertisements in newspapers across the service district, conducted on-board outreach and sent postcards to nearby residents of lines with proposed routing changes, presented the proposal to the Transit Equity Advisory Committee, sent emails to riders and other stakeholders, and staff held seven TriMet Open Houses. Based on feedback received, TriMet modified the plan by:

1. Selecting 82nd Avenue as the preferred route option for the New Airport Bus line; and

⁷ For more information, go to <http://future.trimet.org>

2. Extending Line 24-Fremont over the Fremont Bridge to Goose Hollow in SW Portland, where it would connect with MAX Blue and Red line service. The Line 24 will continue to serve the stops, including Legacy Emmanuel Hospital, on Vancouver and Williams all the way to Russell.

For the second phase of outreach, the updated plan was posted to trimet.org and many elements of the initial outreach phase were repeated (postcards, newspaper advertisements, emails). TriMet held an open house on February 15, 2018 in North Portland to solicit feedback about the updated proposal. Finally, TriMet held a public hearing at its March 28, 2018 board meeting to receive comments on the proposed service changes.

Responses overall were positive about the proposal. The following is a summary of themes across the feedback received:

- Strong community support for the proposed new Airport Bus line on SE 82nd Ave.
- Support for the service increases to OHSU with Lines 61, 64, 66, and 68
- Strong community support for the proposed new Webster line.
- Support from the City of Troutdale for the proposed routing changes to the Lines 81 and 96.
- Strong community support for the proposed all night service with Lines 20 and 57.
- Advocacy to continue to serve Emanuel Hospital and N Vancouver/Williams; informing decision to continue service on Line 24.

V. Summary of Findings

Table 8 on the next page summarizes the results of the line-level and system-level Disparate Impact and Disproportionate Burden analyses. As shown, Title VI concerns are minimal with the proposed FY19 Annual Service Plan. The proposal promises to improve service significantly for minority and low-income populations, with only three improvements (to the Lines 64, 66 and 31 – New Webster Line) serving areas with relatively low minority populations. Lines 64 and 66 improvements also serve a relatively low proportion of low-income households as compared to the TriMet district. However, improving service on these lines does not raise concerns of an inequitable distribution of benefits given: a) the results of the system-level analysis; b) that the other 9 lines proposed for improvements did not have any line-level Disparate Impacts; and c) that the other 10 lines proposed for improvements did not have any line-level Disproportionate Burdens.

The one proposed service reduction (to the Line 79) also does not appear to create disproportionate and adverse effects given the low concentrations of minority and low-income populations potentially impacted.

Table 8: Summary of Disparate Impact and Disproportionate Burden analysis results

		Potential Disparate Impact?	Potential Disproportionate Burden?	
Major Service Reduction	79 – Clackamas/Oregon City	No	No	
Major Service Increases	272 – Airport Bus (New)	No	No	
	31 – Webster (New)	Yes	No	
	24 – Fremont	No	No	
	61 – Marquam Hill/Beaverton	No	No	
	64 – Marquam Hill/Tigard	Yes	Yes	
	66 – Marquam Hill/Hollywood	Yes	Yes	
	68 – Marquam Hill/Collins Circle	No	No	
	73 – 122nd Avenue	No	No	
	79 – Clackamas/Oregon City	No	No	
	81 – Kane/257th	No	No	
	96 – Tualatin/I-5	No	No	
		<i>Combined Improvements (System-level)</i>	No	No
	Other Major Service Changes	Line 4 – Division/Fessenden	No	No

Attachment A: Analysis of impact on access to employment, education, health care, and food for minority and low-income populations

Line 272 – Airport Night Bus

New Line to serve Airport via NE 82nd Avenue

Creates new access
 Improves access
 Removes access
 Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
<ul style="list-style-type: none"> Creates new access to an estimated 31,000 jobs <table border="1" style="margin-left: 20px;"> <caption>Job Creation Comparison</caption> <thead> <tr> <th>Category</th> <th>New Bus Airport</th> <th>TriMet District</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>56%</td> <td>55%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>14%</td> <td>12%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>8%</td> <td>8%</td> </tr> </tbody> </table> <p style="text-align: center;"> ■ New Bus Airport ■ TriMet District </p> <p><small>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.</small></p>	Category	New Bus Airport	TriMet District	Low/Medium Wage Jobs*	56%	55%	Jobs Held by Workers of Color*	14%	12%	Jobs Held by Hispanic/Latino Workers*	8%	8%	<ul style="list-style-type: none"> IRCO Impact NW JOIN Transition Projects 	<ul style="list-style-type: none"> Madison High Helensview HS Hand in Hand Center for Jewish-Arab Education in Israel 	<ul style="list-style-type: none"> 211info 	<ul style="list-style-type: none"> Walgreens (2 locations) China Foods Wholesale La Bouffe International Gourmet
Category	New Bus Airport	TriMet District														
Low/Medium Wage Jobs*	56%	55%														
Jobs Held by Workers of Color*	14%	12%														
Jobs Held by Hispanic/Latino Workers*	8%	8%														

Line 31 – Webster Rd

New line connecting Clackamas TC and Oregon City TC

Creates new access
 Improves access
 Removes access
 Reduces access

	Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
IMPROVE ACCESS	<ul style="list-style-type: none"> • <u>Maintains</u> access to an estimated 18,992 jobs <table border="1"> <caption>Job Characteristics Comparison (IMPROVE ACCESS)</caption> <thead> <tr> <th>Characteristic</th> <th>New Webster Line</th> <th>TriMet District</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>64%</td> <td>55%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>8%</td> <td>12%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>11%</td> <td>8%</td> </tr> </tbody> </table> <p style="text-align: center;"> ■ New Webster Line ■ TriMet District </p>	Characteristic	New Webster Line	TriMet District	Low/Medium Wage Jobs*	64%	55%	Jobs Held by Workers of Color*	8%	12%	Jobs Held by Hispanic/Latino Workers*	11%	8%	N/A	<ul style="list-style-type: none"> • Clackamas Comm. Col • Clackamas Middle College • Kraxberger Middle • NW Alternative School • Sabin-Schellenberg Center South 	<ul style="list-style-type: none"> • Los Ninos Cuentan • Central City Concern • Roth Senior Care • Recovery Association Project, Inc 	<ul style="list-style-type: none"> • Walgreens (2 locations) • Safeway • Natural Grocers by Vitamin Cottage • Rite Aide
Characteristic	New Webster Line	TriMet District															
Low/Medium Wage Jobs*	64%	55%															
Jobs Held by Workers of Color*	8%	12%															
Jobs Held by Hispanic/Latino Workers*	11%	8%															
NEW ACCESS	<ul style="list-style-type: none"> • <u>Creates</u> access to an estimated 1,297 jobs <table border="1"> <caption>Job Characteristics Comparison (NEW ACCESS)</caption> <thead> <tr> <th>Characteristic</th> <th>Webster Line (new coverage area)</th> <th>TriMet District</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>68%</td> <td>55%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>8%</td> <td>12%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>8%</td> <td>8%</td> </tr> </tbody> </table> <p style="text-align: center;"> ■ Webster Line (new coverage area) ■ TriMet District </p>	Characteristic	Webster Line (new coverage area)	TriMet District	Low/Medium Wage Jobs*	68%	55%	Jobs Held by Workers of Color*	8%	12%	Jobs Held by Hispanic/Latino Workers*	8%	8%	N/A	<ul style="list-style-type: none"> • Sabin-Schellenberg Center North 	N/A	<ul style="list-style-type: none"> • Safeway
Characteristic	Webster Line (new coverage area)	TriMet District															
Low/Medium Wage Jobs*	68%	55%															
Jobs Held by Workers of Color*	8%	12%															
Jobs Held by Hispanic/Latino Workers*	8%	8%															

**Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.*

Line 79 – Clackamas/Oregon City

Route change to serve 82nd Ave and I-205. Streamlining trip between Clackamas TC and Oregon City TC

Creates new access Improves access Removes access Reduces access

	Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
NEW ACCESS	<ul style="list-style-type: none"> Creates new access to an estimated 462 jobs <table border="1"> <caption>Job Access Data for New Access</caption> <thead> <tr> <th>Category</th> <th>Line 79-new</th> <th>TriMet District</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>66%</td> <td>55%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>4%</td> <td>12%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>7%</td> <td>8%</td> </tr> </tbody> </table> <p>Legend: ■ Line 79-new ■ TriMet District</p>	Category	Line 79-new	TriMet District	Low/Medium Wage Jobs*	66%	55%	Jobs Held by Workers of Color*	4%	12%	Jobs Held by Hispanic/Latino Workers*	7%	8%	N/A	<ul style="list-style-type: none"> Living Room 	<ul style="list-style-type: none"> Recovery Association Project, Inc. Anger Mgmt Agency 	<ul style="list-style-type: none"> Safeway
Category	Line 79-new	TriMet District															
Low/Medium Wage Jobs*	66%	55%															
Jobs Held by Workers of Color*	4%	12%															
Jobs Held by Hispanic/Latino Workers*	7%	8%															
IMPROVED ACCESS	<ul style="list-style-type: none"> Improves access to an estimated 33,940 jobs <table border="1"> <caption>Job Access Data for Improved Access</caption> <thead> <tr> <th>Category</th> <th>Line 79-improved</th> <th>TriMet District</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>62%</td> <td>55%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>8%</td> <td>12%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>10%</td> <td>8%</td> </tr> </tbody> </table> <p>Legend: ■ Line 79-improved ■ TriMet District</p>	Category	Line 79-improved	TriMet District	Low/Medium Wage Jobs*	62%	55%	Jobs Held by Workers of Color*	8%	12%	Jobs Held by Hispanic/Latino Workers*	10%	8%	N/A	<ul style="list-style-type: none"> Clackamas Comm. Col Clackamas Middle College Sabin-Schellenberg Center South 	<ul style="list-style-type: none"> Central City Concern Clinic North Clackamas DHS Roth Senior Care Los Nino Cuentan Recovery Assoc. Proj. 	<ul style="list-style-type: none"> Safeway Cash & Carry Tombstone Grocery Natural Grocers by Vitamin Cottage
Category	Line 79-improved	TriMet District															
Low/Medium Wage Jobs*	62%	55%															
Jobs Held by Workers of Color*	8%	12%															
Jobs Held by Hispanic/Latino Workers*	10%	8%															

<p>REMOVED ACCESS</p>	<ul style="list-style-type: none"> Removes access to an estimated 7,626 jobs <table border="1"> <caption>Chart Data</caption> <thead> <tr> <th>Category</th> <th>Line 79-removed (%)</th> <th>TriMet District (%)</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>62%</td> <td>55%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>9%</td> <td>12%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>8%</td> <td>8%</td> </tr> </tbody> </table> <p>Legend: ■ Line 79-removed ■ TriMet District</p>	Category	Line 79-removed (%)	TriMet District (%)	Low/Medium Wage Jobs*	62%	55%	Jobs Held by Workers of Color*	9%	12%	Jobs Held by Hispanic/Latino Workers*	8%	8%	<p>N/A</p>	<p>N/A</p>	<p>N/A</p>	<ul style="list-style-type: none"> Safeway
Category	Line 79-removed (%)	TriMet District (%)															
Low/Medium Wage Jobs*	62%	55%															
Jobs Held by Workers of Color*	9%	12%															
Jobs Held by Hispanic/Latino Workers*	8%	8%															

**Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.*

Line 61 – Marquam Hill/Beaverton

Added frequency on Weekdays

Creates new access
 Improves access
 Removes access
 Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
<p>• <u>Improves</u> access to an estimated 40,332 jobs</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <caption>Bar Chart Data</caption> <thead> <tr> <th>Category</th> <th>Line 61 (%)</th> <th>TriMet District (%)</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>47%</td> <td>55%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>15%</td> <td>12%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>6%</td> <td>8%</td> </tr> </tbody> </table> <p style="text-align: center;"> ■ Line 61 ■ TriMet District </p> <p><small>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.</small></p>	Category	Line 61 (%)	TriMet District (%)	Low/Medium Wage Jobs*	47%	55%	Jobs Held by Workers of Color*	15%	12%	Jobs Held by Hispanic/Latino Workers*	6%	8%	<ul style="list-style-type: none"> • Mentors 360 	<ul style="list-style-type: none"> • Wilson HS • Hilltop School of Music • Sylvan Learning Center • Gray Middle School • Jesuit HS 	<ul style="list-style-type: none"> • OHSU • Child Foundation • Neighborhood House • Handy Hands • American Veterans Aid • Center for Behavioral Health • G & J Home Care Services 	<ul style="list-style-type: none"> • Food Front Cooperative Grocery • Safeway • Rite Aid • Trader Joes • Walgreen • Uwajimaya • Ross Island Grocery and Café • New Seasons • Natural Grocers • Albertsons
Category	Line 61 (%)	TriMet District (%)														
Low/Medium Wage Jobs*	47%	55%														
Jobs Held by Workers of Color*	15%	12%														
Jobs Held by Hispanic/Latino Workers*	6%	8%														

Line 64 – Marquam Hill/Tigard

Added frequency on Weekdays

Creates new access
 Improves access
 Removes access
 Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
<p>• <u>Improves</u> access to an estimated 45,327 jobs</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <caption>Bar Chart Data</caption> <thead> <tr> <th>Category</th> <th>Line 64 (%)</th> <th>TriMet District (%)</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>47%</td> <td>55%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>13%</td> <td>12%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>9%</td> <td>8%</td> </tr> </tbody> </table> <p style="text-align: center;"> ■ Line 64 ■ TriMet District </p> <p><small>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.</small></p>	Category	Line 64 (%)	TriMet District (%)	Low/Medium Wage Jobs*	47%	55%	Jobs Held by Workers of Color*	13%	12%	Jobs Held by Hispanic/Latino Workers*	9%	8%	<ul style="list-style-type: none"> • Mentors 360 	<ul style="list-style-type: none"> • Wilson HS • Westside Christian HS 	<ul style="list-style-type: none"> • OHSU • Luke-Dorf Behavioral Health Service • Neighborhood House • Oregon Coalition Against Domestic Violence • Regency Home Care • Infinite Care Giving Services • Zero to Three 	<ul style="list-style-type: none"> • Food Front Cooperative Grocery • Rite Aid • Walgreen • Ross Island Grocery and Café • Cash & Carry • Natural Grocers • Halal Meat & Mediterranean Food
Category	Line 64 (%)	TriMet District (%)														
Low/Medium Wage Jobs*	47%	55%														
Jobs Held by Workers of Color*	13%	12%														
Jobs Held by Hispanic/Latino Workers*	9%	8%														

Line 66 – Marquam Hill/Hollywood

Added frequency on Weekdays

Creates new access
 Improves access
 Removes access
 Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
<p>• <u>Improves</u> access to an estimated 49,827 jobs</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <caption>Bar Chart Data</caption> <thead> <tr> <th>Category</th> <th>Line 66 (%)</th> <th>TriMet District (%)</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>45%</td> <td>55%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>13%</td> <td>12%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>6%</td> <td>8%</td> </tr> </tbody> </table> <p style="text-align: center;"> ■ Line 66 ■ TriMet District </p> <p><small>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.</small></p>	Category	Line 66 (%)	TriMet District (%)	Low/Medium Wage Jobs*	45%	55%	Jobs Held by Workers of Color*	13%	12%	Jobs Held by Hispanic/Latino Workers*	6%	8%	<ul style="list-style-type: none"> • Dress for Success of Oregon 	<ul style="list-style-type: none"> • Cleveland HS • Mother and Child Education Center • Resolutions NW • Big Brothers Big Sisters 	<ul style="list-style-type: none"> • OHSU • Hollywood Senior Center • DHS-CAF • Cascadia Behavioral Healthcare • Homewatch Care Givers of Portland • Impact NW • On the Move Community Integration • Catholic Community Services 	<ul style="list-style-type: none"> • People's Food Cooperative Grocery • Rite Aid (2 locations) • Safeway • Walgreens (2 locations) • Ross Island Grocery and Café • Trader Joes • Hollywood Grocery Outlet • New Seasons
Category	Line 66 (%)	TriMet District (%)														
Low/Medium Wage Jobs*	45%	55%														
Jobs Held by Workers of Color*	13%	12%														
Jobs Held by Hispanic/Latino Workers*	6%	8%														

Line 68 – Marquam Hill/Collins Circle

Added frequency on Weekdays

Creates new access
 Improves access
 Removes access
 Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
<p>• <u>Improves</u> access to an estimated 43,840 jobs</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <caption>Bar Chart Data</caption> <thead> <tr> <th>Category</th> <th>Line 68 (%)</th> <th>TriMet District (%)</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>39%</td> <td>55%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>14%</td> <td>12%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>5%</td> <td>8%</td> </tr> </tbody> </table> <p style="text-align: center;"> ■ Line 68 ■ TriMet District </p> <p><small>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.</small></p>	Category	Line 68 (%)	TriMet District (%)	Low/Medium Wage Jobs*	39%	55%	Jobs Held by Workers of Color*	14%	12%	Jobs Held by Hispanic/Latino Workers*	5%	8%	<ul style="list-style-type: none"> • Rural Community Assistance Corporation • NeighborWorks America 	<ul style="list-style-type: none"> • Lincoln HS • St. Mary's Academy School • Outside In-Urban Ed • Portland Chinese School • The Northwest Academy 	<ul style="list-style-type: none"> • OHSU • Central City Concern • NARA Outpatient • Oregon Hospice Association • Senior Service America • Portland Homeless Family Solutions • Impact NW • Northwest Pilot Project 	<ul style="list-style-type: none"> • Safeway • Ross Island Grocery and Cafe
Category	Line 68 (%)	TriMet District (%)														
Low/Medium Wage Jobs*	39%	55%														
Jobs Held by Workers of Color*	14%	12%														
Jobs Held by Hispanic/Latino Workers*	5%	8%														

Line 73 – 122nd Avenue

Added frequency on Weekdays

Creates new access
 Improves access
 Removes access
 Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
<p>• <u>Improves</u> access to an estimated 14,166 jobs</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <caption>Bar Chart Data</caption> <thead> <tr> <th>Category</th> <th>Line 73 (%)</th> <th>TriMet District (%)</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>74%</td> <td>55%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>9%</td> <td>12%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>14%</td> <td>8%</td> </tr> </tbody> </table> <p style="text-align: center;"> ■ Line 73 ■ TriMet District </p> <p><small>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.</small></p>	Category	Line 73 (%)	TriMet District (%)	Low/Medium Wage Jobs*	74%	55%	Jobs Held by Workers of Color*	9%	12%	Jobs Held by Hispanic/Latino Workers*	14%	8%	N/A	<ul style="list-style-type: none"> • Alice Ott Middle School • Parkrose HS • Mt Hood Community College • Sylvan Learning Center 	<ul style="list-style-type: none"> • NARA Wellness and Youth Center • Multiple Sclerosis Society of Portland • Human Solutions 	<ul style="list-style-type: none"> • Walgreens (2 locations) • Safeway (2 locations) • Rite Aid • Hong Phat Market • New Day Market • 5C Quick Mart • Tawakal Grocery Halal • Division Grocery Outlet
Category	Line 73 (%)	TriMet District (%)														
Low/Medium Wage Jobs*	74%	55%														
Jobs Held by Workers of Color*	9%	12%														
Jobs Held by Hispanic/Latino Workers*	14%	8%														

Line 81 – Kane/257th

Added frequency on Weekdays

Creates new access
 Improves access
 Removes access
 Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
<p>• <u>Improves</u> access to an estimated 17,675 jobs</p> <table border="1" style="margin-left: 20px; border-collapse: collapse;"> <caption>Bar Chart Data</caption> <thead> <tr> <th>Category</th> <th>Line 81 (%)</th> <th>TriMet District (%)</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>66%</td> <td>55%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>9%</td> <td>12%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>12%</td> <td>8%</td> </tr> </tbody> </table> <p style="text-align: center; margin-top: 10px;"> ■ Line 81 ■ TriMet District </p> <p style="font-size: small; margin-top: 10px;"> *Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau. </p>	Category	Line 81 (%)	TriMet District (%)	Low/Medium Wage Jobs*	66%	55%	Jobs Held by Workers of Color*	9%	12%	Jobs Held by Hispanic/Latino Workers*	12%	8%	N/A	<ul style="list-style-type: none"> Mt. Hood Community College Burlingame Creek HS Reynolds HS Gresham HS 	<ul style="list-style-type: none"> YWCA of Greater Portland Gresham Senior Center Impact NW Morrison Child and Family Services 	<ul style="list-style-type: none"> Walgreens Safeway Rite Aid Albertsons Tienda San Miguel
Category	Line 81 (%)	TriMet District (%)														
Low/Medium Wage Jobs*	66%	55%														
Jobs Held by Workers of Color*	9%	12%														
Jobs Held by Hispanic/Latino Workers*	12%	8%														

Line 96 – Tualatin/I-5

Added frequency on Weekdays

Creates new access
 Improves access
 Removes access
 Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
<p>• Improves access to an estimated 99,524 jobs</p> <table border="1" style="margin-top: 10px;"> <caption>Bar Chart Data</caption> <thead> <tr> <th>Category</th> <th>Line 96 (%)</th> <th>TriMet District (%)</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>48%</td> <td>55%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>7%</td> <td>12%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>11%</td> <td>8%</td> </tr> </tbody> </table> <p style="font-size: small; margin-top: 10px;">*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.</p>	Category	Line 96 (%)	TriMet District (%)	Low/Medium Wage Jobs*	48%	55%	Jobs Held by Workers of Color*	7%	12%	Jobs Held by Hispanic/Latino Workers*	11%	8%	<ul style="list-style-type: none"> • Rural Community Assistance Corporation • Pathfinders of Oregon 	<ul style="list-style-type: none"> • Tualatin HS • Sylvan Learning Center • Lincoln HS • St. Mary's Academy School • Outside In-Urban Ed • Horizon HS • The Northwest Academy 	<ul style="list-style-type: none"> • Progress Health Services • OnePoint Patient Care • NARA Outpatient • Payless Long Term Care Pharmacy • Central City Concern • Morrison Center • Senior Service America • Oregon Hospice Association • National Indian Child Welfare Association • Make-A-Wish Foundation • Holt International Children's Service • Oregon Coalition Against DV 	<ul style="list-style-type: none"> • Safeway (3 locations) • Trader Joes • Zupan's Market • Walgreens (2 locations) • Walmart • Ross Island Grocery and Cafe • Barbur World Foods • Whole Foods Market
Category	Line 96 (%)	TriMet District (%)														
Low/Medium Wage Jobs*	48%	55%														
Jobs Held by Workers of Color*	7%	12%														
Jobs Held by Hispanic/Latino Workers*	11%	8%														

Line 24 – Fremont

Route length change over the Fremont Bridge to Goose Hollow. Frequency increased.

Creates new access
 Improves access
 Removes access
 Reduces access

	Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets
NEW ACCESS	<ul style="list-style-type: none"> Creates new access to an estimated 26,396 jobs <p style="text-align: center;"> ■ Line 24 new ■ TriMet District </p>	N/A	<ul style="list-style-type: none"> Lincoln HS Outside In-Urban Ed The Northwest Academy The Children’s Institute Maximus K-12 Education 	<ul style="list-style-type: none"> Raphael House Changing Perceptions Outside In NARA Outpatient Portland Homeless Family Solutions DVSD 	<ul style="list-style-type: none"> Food Front Cooperative Grocery Safeway Walgreens (3 locations) New Seasons Cash & Carry (2 locations)
IMPROVED ACCESS	<ul style="list-style-type: none"> Improves access to an estimated 39,378 jobs <p style="text-align: center;"> ■ Line 24 improved ■ TriMet District </p>	<ul style="list-style-type: none"> The Mentoring Project Kairos PDX Young Minds of Awareness Friends of the Children 	<ul style="list-style-type: none"> Beaumont Access Alternative Program IRCO Africa House Sylvan Learning Center 	<ul style="list-style-type: none"> Ronald McDonald House Charities 	<ul style="list-style-type: none"> WinCo Safeway Walgreens (2 locations) Whole Foods New Seasons Thanh Thao Market

*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not “White Alone”. Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.

Date: April 25, 2018

To: Board of Directors

From: Doug Kelsey

Subject: **ORDINANCE 350 OF THE TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET) ADOPTING SERVICE CHANGES, UPDATING ROUTE DESIGNATIONS, AND AMENDING TRIMET CODE CHAPTER 22 (SECOND READING)**

1. Purpose of Item

Ordinance 350 requests that the TriMet Board of Directors (Board) adopt service changes and update route designations contained in TriMet Code Chapter 22.

2. Type of Agenda Item

- Initial Contract
- Contract Modification
- Other: Ordinance

3. Reason for Board Action

The Board may adopt service changes and update TriMet Code route designations by ordinance. The TriMet Code may be amended only by adoption of an ordinance. The Board conducted a first reading of Ordinance 350 at its March 28, 2018 meeting.

4. Type of Action

- Resolution
- Ordinance 1st Reading
- Ordinance 2nd Reading
- Other _____

5. Background

Ordinance 350 adopts service changes and updates route designations set forth in TriMet Code Chapter 22. The proposed service changes originate from the District’s Service Enhancement Plan (SEP) process addressing the agency’s 20-year vision for bus service improvements within the TriMet district and from public input before and after the initial proposed changes.

A. Proposed Service Changes

Ordinance 350 includes bus service changes for fiscal year 2019. In this fiscal year, 2 new bus lines will be added, 4 bus lines will have trips added due to overloads, 4 bus lines will have increased weekday frequencies, 7 bus lines will have increased span or

new weekend service, and 2 bus lines will have 24-hour service. There are 3 bus lines that will have a route change or extension. The new changes will begin in September 2018 and March 2019 as noted below.

Quarter	Line	Service Change
	4 Division/Fessenden split into two lines:	Split into two lines, Line 2-Division and Line 4-Fessenden. The current Line 4-Division/Fessenden is very long and experiences difficulty staying on time. The line is being split to improve reliability by reducing the opportunities for congestion.
	4 Fessenden	
	2 Division	Increased weekday midday frequency between Beaverton TC and Portland. Operate service 24 hours a day, with the intention of getting late night and early morning workers to/from work.
	20 Burnside/Stark	
September 2018	73 122 nd Ave.	Increased weekday midday frequency.
	61 Marquam Hill/Beaverton 64 Marquam Hill/Tigard 66 Marquam Hill/Hollywood 68 Marquam Hill/Collins Cir.	More service earlier and later to better meet OHSU shift times.
	96 Tualatin/I-5	Add weekday midday service
	57 Tualatin Valley Highway	Operate service 24 hours a day, with the intention of getting late night and early morning workers to/from work.
	81 Kane/257 th	Increase weekday, peak frequency and operate service earlier and later to help late night and early morning workers get to/from work in the Troutdale Reynolds Industrial Park.
	272 PDX Night Bus (new line)	Operate between PDX and SE Stark and SE 80 th via 82 nd Ave. Only operates during the hours that the Red Line MAX is not operating. This line is intended to help late night/early morning workers get on and off their shifts as well as help passengers on early departures and late arrivals.
	17 Holgate/Broadway 35 Macadam/Greeley 56 Scholls Ferry Rd. 94 Pacific Highway/Sherwood	Added trip(s) to reduce overcrowding.
March 2019	24 Fremont	Extend route across the Fremont Bridge and through NW Portland to the Goose Hollow MAX station. Improve frequency and add weekend service. This improvement is intended to help people from NE Portland access jobs on the Westside faster.
	79 Clackamas/Oregon City	Change route for a more direct trip and to serve a new area.
	31 Webster (new line)	A new line serving Webster Rd. and parts of Gladstone formerly served by Line 79.

The complete list of proposed Ordinance 350 service changes are set forth in Exhibit A.

B. Service Change Public Process

The proposed service changes are the result of numerous conversations and meetings with jurisdictions, businesses, customers, and community stakeholders. In addition to outreach activities conducted by TriMet service planners, advertisements regarding the proposed service changes were placed in newspapers across the district during two phases of outreach.

In November 2017, TriMet launched the initial feedback plan for the proposed service changes. TriMet sent postcards to residents around the lines proposed to change, posted signs at affected stops, published ads in community newspapers, rode buses to distribute information, and sent emails to interested parties and riders. TriMet's website solicited feedback about the proposed service changes (www.trimet.org/plan). TriMet also held seven (7) open house meetings around the metro area, including one conducted for Spanish speaking populations.

In February 2018, TriMet used the feedback from the initial phase to update some of the proposed changes and then launched a second round of outreach, including community newspaper ads, postcards, riding the buses to hand out information, and emails to interested parties.

On February 15, 2018, TriMet hosted an Open House at the Legacy Emanuel Hospital to provide information and solicit public comment on the revised proposal. Between 170 and 200 people attended the eight (8) open house meetings held during both outreach phases (the exact number is not known because not everyone signed in).

The service improvements were also reviewed with TriMet's Transit Equity Advisory Committee, Committee on Accessible Transportation, and HB2017 Transit Advisory Committee. The HB2017 Transit Advisory Committee voted to include the FY19 service improvements in the transportation improvement plan to be submitted to the Oregon Transportation Commission as required by HB2017.

Finally, public comment on the proposed service changes was accepted by phone, email, standard mail, and at all the public meetings. The FY19 Annual Service Change Outreach Report was included in the Board packet for the March meeting and an opportunity for public testimony was provided during the March meeting. A summary of any comments received since the March 28, 2018 meeting will be provided to the Board prior to the April 25, 2018 Board meeting.

C. Title VI Transit Equity Analysis

In accordance with Federal Transit Administration (FTA) Title VI Circular 4702.1B implementing Title VI of the Civil Rights Act, major service changes must be analyzed to identify potential disproportionate impacts to minority and low-income populations. Ordinance 350 includes 12 major service changes.

The TriMet draft Title VI service equity analysis (Report) was provided to the Board before the March 2018 meeting. The Report evaluated potential adverse effects and benefits associated with the proposed major service changes. To summarize, the Title VI concerns are minimal with the proposed service changes outlined in Ordinance 350. The proposed service changes improve service significantly for minority and low-income populations, with only three improvements (to the Lines 64, 66, and 31) serving areas with relatively low minority populations and two improvements (Lines 64 and 66) serving a relatively low proportion of low-income households as compared to the TriMet district. However, improving service on these lines does not raise concerns of an inequitable distribution of benefits given: a) the results of the system-level analysis; b) 9 lines proposed for improvements did not have any line-level Disparate Impacts; and c) 10 lines proposed for improvements did not have any line-level Disproportionate Burdens. The one proposed service reduction (to the Line 79) also does not appear to create disproportionate and adverse effects given the low concentrations of minority and low-income populations potentially impacted.

The results and findings of the Title VI service equity analysis was presented to the Board for their consideration at the March 28, 2018 meeting. The final Report with any supplemental public feedback will be provided to the Board prior to the April 25, 2018 meeting.

6. Financial/Budget Impact

Service changes proposed in Ordinance 350 will result in a FY2018 budget impact of approximately \$8.0 million, with about half of it paid for by revenues generated by the 2016 payroll tax increase and half coming from HB2017 funding.

7. Impact if Not Approved

The Board may choose not to conduct a second reading for Ordinance 350 at its April 25, 2018 meeting. This option, however, is not recommended. The proposed service changes enable TriMet to continue to serve the growing region, provide expanded service, and maintain service capacity and reliability.

ORDINANCE NO. 350

ORDINANCE OF THE TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET) ADOPTING SERVICE CHANGES, UPDATING ROUTE DESIGNATIONS, AND AMENDING TRIMET CODE CHAPTER 22 (SECOND READING)

THE BOARD OF DIRECTORS OF THE TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET), pursuant to the authority of Oregon Revised Statutes Chapter 267, having considered the transit equity service change analysis Final Report, does hereby ordain and decree the following Ordinance:

Section 1- Adoption of Service Changes

Service Changes are adopted as set forth on the Attached Exhibit A, which is incorporated into and made part of this Ordinance. In accordance with TriMet Code Section 22.05, new Schedule Notices shall be filed for affected lines.


Section 2- Amendment of TriMet Code Chapter 22

TriMet Code Section 22.05 is amended to make the Route Designation updates set forth in attached Exhibit A.

Section 3- Effective/Operative Dates

This Ordinance shall take effect thirty days after the date of its adoption. Operative dates for specific Service Changes and Route Designation updates shall be as designated on Exhibit A.

Dated: April 25, 2018



Presiding Officer

Attest:



Recording Secretary

Approved as to Legal Sufficiency:



Legal Department

**ORDINANCE NO. 350
EXHIBIT A**

Service Changes and TriMet Code Chapter 22 Route Designation Updates

Service Changes are adopted and TriMet Code Chapter 22 Route Designations are updated as set forth below:

Section 1 – Service Changes

Affected Lines	Description
	<i>Operative September 2, 2018</i>
4 Division/Fessenden split into two lines: 2 Division 4 Fessenden	Split the line into two routes to help buses stay on time: Line 2-Division running between Gresham Transit Center and Downtown Portland, and Line 4-Fessenden between Downtown Portland and St. Johns. Transfer between the lines on the Transit Mall in Downtown Portland.
20 Burnside/Stark	Service 24/7 between Beaverton Transit Center and Gresham to accommodate earlier and later work shifts. Increased frequency between Beaverton TC and Downtown Portland.
57 Tualatin Valley Highway	Service 24/7 between Beaverton Transit Center and Forest Grove.
61 Marquam Hill/Beaverton	Earlier and later trips to and from Marquam Hill to accommodate earlier and later work shifts.
64 Marquam Hill/Tigard	Earlier and later trips to and from Marquam Hill to accommodate earlier and later work shifts.
66 Marquam Hill/Hollywood	Earlier and later trips to and from Marquam Hill to accommodate earlier and later work shifts.
68 Marquam Hill/Collins Cir.	Earlier and later trips to and from Marquam Hill to accommodate earlier and later work shifts.
73 122 nd Ave.	Increased weekday mid-day frequency to help get riders to jobs, shopping and recreation.
81 Kane/257 th	Increased weekday, peak frequency and hours of operation to better serve businesses in the area.

Affected Lines	Description
96 Tualatin/I-5	New weekday, mid-day service between Tualatin and Downtown Portland in response to community feedback.
272 PDX Night Bus	A new bus route operating between the airport and SE Stark and 80 th when the MAX Red Line isn't running. This would provide transit access to PDX via 82 nd Avenue where riders could transfer to proposed overnight service on Line 20 at Burnside.
<i>Operative March 3, 2019</i>	
Line 24 Fremont	Extend the route over the Fremont Bridge to NW Portland and Goose Hollow in SW Portland where it would connect with MAX Blue and Red line service. Increased frequency weekday and add weekend service.
Line 31 Webster	New route between Clackamas Town Center and Oregon City Transit Center via Thiessen, Webster, Arlington and McLoughlin that covers some of the old Line 79 route.
Line 79 Clackamas/Oregon City	Reroute Line 79 to 82 nd Ave, I-205 and Washington Street, providing a more direct trip between Clackamas Town Center and Oregon City, and eliminate service on Strawberry Lane.

Section 2 – Route Designation Revisions to TriMet Code Chapter 22, Section 22.05

Operative September 2, 2018

Add “272 PDX Night Bus”

Add “2 Division”

Change “4 Division/Fessenden” to “4 Fessenden”

Change “24 Fremont” to “24 Fremont/NW 18th Ave.”

Operative March 3, 2019:

Add “31 Webster”

Attachment L

FY2020 Annual Service Plan Equity Analysis



Title VI Service Equity Analysis: FY2020 Annual Service Plan
Department of Transit Equity, Inclusion, and Community Affairs
April 25, 2019

Date: April 24, 2019

To: Board of Directors

From: Doug Kelsey 

Subject: **ORDINANCE NO. 353 OF THE TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET) ADOPTING SERVICE CHANGES, REVISING ROUTE DESIGNATIONS, AND AMENDING TRIMET CODE CHAPTER 22 (SECOND READING)**

1. Purpose of Item

Ordinance 353 requests that the TriMet Board of Directors (Board) adopt service changes and revise route designations contained in TriMet Code Chapter 22, Section 22.05.

2. Type of Agenda Item

- Initial Contract
- Contract Modification
- Other: Ordinance

3. Reason for Board Action

The Board may adopt service changes and revise TriMet Code route designations by ordinance. The TriMet Code may be amended only by adoption of an ordinance. Adoption of this Ordinance 353 required a public hearing and this Second Reading.

4. Type of Action

- Resolution
- Ordinance 1st Reading
- Ordinance 2nd Reading
- Other _____

5. Background

Ordinance 353 adopts service changes and revises route designations set forth in TriMet Code Chapter 22, Section 22.05. Most of the proposed service changes arise from the District's Service Enhancement Plan (SEP) process. That process addresses TriMet's 20-year vision for bus service improvements within the District, and considers public input received before and after the proposed changes were publicized.

A. Proposed Service Changes:

Ordinance 353 includes bus service changes for fiscal years 2019 and 2020. Service changes initiated in December of 2018 as experimental changes will be included as regular service in FY2019, upon the effective date of this Ordinance 353.

For FY2020, other service changes described in Ordinance 353 will begin in September 2019 and March 2020. In FY2020, two bus lines would be upgraded to Frequent Service, two bus lines would receive Sunday service, and one bus line would receive weekday

frequency and service span improvements, as well as Saturday and Sunday service. One bus line would also have a route change as well as two streamlined trips. Another bus line would take over service for an existing line via a route change.

The proposed service changes and their effective dates are generally described below.

Month	Line	Service Change
May 2019	22 Parkrose	Add run time for reliability and increase frequency. Service change initiated in Dec. 2018 as 180 day experimental service.
	23 San Rafael	Add run time for reliability and increase frequency. Service change initiated in Dec. 2018 as 180 day experimental service.
	25 Glisan/Rockwood	Add run time for reliability and increase frequency. Service change initiated in Dec. 2018 as 180 day experimental service.
September 2019	19 Woodstock/Glisan	Change route to serve SW Lincoln St. and SW 1 st St. between the Transit Mall (SW 5 th /6 th avenues) and SW 1 st & Arthur St. This change would improve reliability by avoiding the congested curves on SW Sheridan St., while still serving most customers. Eliminate the last two weekday afternoon outbound deviations to Union Manor due to difficulty turning onto SE McLoughlin Blvd. during the p.m. peak. The deviations average less than two boarding rides combined.
	30 Estacada	Add Sunday service. Service would match the existing service on Saturday.
	32 Oatfield Rd.	Add Sunday service. Service would match the existing service on Saturday.
	74 162 nd Ave.	Add weekday peak service, run weekday service later, and add Saturday and Sunday service.
March 2020	20 Burnside/Stark	Increase weekday and weekend frequency to Frequent Service.
	76 Beaverton/Tualatin	Increase weekday and weekend frequency to Frequent Service. Change name to 76 Hall/Greenberg.
	78 Beaverton/Lake Oswego 42 Denney/Hall	Line 78 takes over for Line 42 between Beaverton Transit Center and Tigard Transit Center and then returns to its current route to Lake Oswego Transit Center. This results in more weekday service (earlier/later) and weekend service on Denney Rd. and Hall Blvd. Change name to 78 Denney/Kerr Pkwy.

The complete list of service changes that will take effect as the result of the Board's adoption of this Ordinance 353 are set forth in the attached Exhibit A.

B. Service Change Public Process

The proposed service changes are the result of numerous conversations and meetings with jurisdictions, businesses, customers, and community stakeholders. In addition to outreach activities conducted by TriMet service planners, advertisements regarding the proposed service changes were placed in newspapers across the district during two phases of outreach during September 2018 and February 2019.

In September 2018, TriMet launched the initial outreach for the proposed service changes. TriMet sent postcards to residents living near the lines proposed to change, posted signs at affected bus stops, published ads in community newspapers, rode buses to hand out information, posted updates to multiple social media accounts, and sent emails to interested parties and riders. TriMet's website solicited feedback about the proposed service changes (www.trimet.org/plan). TriMet also held seven open house meetings around the metro area, attended by at least 288 community members. TriMet contracted with the Immigrant & Refugee Community Organization (IRCO) to design, promote, and help run the open house meetings. Open house attendees received HOP cards, while IRCO provided food, interpretation services, and daycare upon request.

In late January 2019, TriMet used the feedback from the initial phase to update the proposal. Because of the overwhelming positive feedback from the public, staff kept all service improvements in the original proposal and only added a minor change to two trips on Line 19-Woodstock/Glisan to better streamline the route. TriMet staff then launched a second round of outreach, including community newspaper ads, postcards, riding the buses to hand out information, bus stop postings, a community meeting, social media updates, and emails to interested parties.

In February 2019, TriMet hosted two open house meetings – one in East Portland and one in downtown Portland – to provide information and solicit public comment on the revised proposal (a third open house meeting in Beaverton had to be cancelled twice due to snow and ice). Approximately 314 people attended the nine open house meetings held during both outreach phases (the exact number is not known because not everyone signed in).

The service improvements were also reviewed with TriMet's Transit Equity Advisory Committee (TEAC), Committee on Accessible Transportation (CAT), and HB2017 Transit Advisory Committee. The HB2017 Transit Advisory Committee voted to include the FY20 service improvements in the transportation improvement plan to be submitted to the Oregon Transportation Commission as required by HB2017.

Finally, public comment on the proposed service changes was accepted by phone, email and standard mail. A summary of TriMet's community outreach is included in the FY20 Annual Service Change Outreach Report, which was presented to the Board at the March 27, 2019, meeting. Opportunity for further public testimony was provided during the March 27 Board meeting, but no testimony was offered and no additional public comments have been received since the March 27, 2019, meeting.

C. Title VI Transit Equity Analysis

In accordance with Federal Transit Administration (FTA) Title VI Circular 4702.IB implementing Title VI of the Civil Rights Act, major service changes must be analyzed to identify potential disproportionate impacts to minority and low-income populations. Nine major service changes are made by Ordinance 353 and have been subjected to TriMet's Title VI analysis.

Included in your Board packet is the final Title VI Service Equity Analysis Report (Report), which evaluated potential adverse effects and benefits associated with the proposed major service changes. To summarize, the Title VI concerns associated with the proposed service changes are minimal. The proposed service changes improve service significantly for minority and low-income populations, with only two improvements (to the Lines 30 and 32) serving areas with relatively low minority populations as compared to the TriMet district.

However, improving service on these lines does not raise concerns of an inequitable distribution of benefits given: a) the results of the system-level analysis; b) that the other 7 lines proposed for improvements did not have any line-level Disparate Impacts; and c) the 9 lines proposed for improvements did not have any line-level Disproportionate Burdens.

The results and findings of the Title VI service equity analysis was presented to the Board for its consideration at the March 27, 2019, meeting. The final Title VI Report is provided to the Board at its April 24, 2019, meeting.

6. Financial/Budget Impact

Service changes proposed in Ordinance 353 will result in a FY2020 budget impact of approximately \$4.7 million, paid for by revenues generated by the HB2017 funding and the 2015 employer payroll tax increase.

7. Impact if Not Approved

The Board may choose not to conduct a Second Reading for Ordinance 353 at its April 24, 2019 meeting. This option is not recommended. The proposed service changes enable TriMet to continue to respond to demands for service in growing parts of the District, formally implement TriMet's December 2018 experimental service improvements, provide expanded service overall, and maintain current service capacity and reliability. Additionally, adoption of Ordinance 353 would fulfill the FY20 service improvements documented in TriMet's *Public Transportation Improvement Plan* (i.e., HB 2017 plan).

ORDINANCE NO. 353

**ORDINANCE NO. 353 OF THE TRI-COUNTY METROPOLITAN
TRANSPORTATION DISTRICT OF OREGON (TRIMET) ADOPTING
SERVICE CHANGES, UPDATING ROUTE DESIGNATIONS, AND AMENDING
TRIMET CODE CHAPTER 22 (SECOND READING)**

The Board of Directors of the Tri-County Metropolitan Transportation District of Oregon (TriMet), pursuant to the authority of Oregon Revised Statutes Chapter 267, having reviewed, considered and approved the Title VI Service Equity Analysis Final Report, does hereby ordain and decree the following Ordinance:

Section 1- Adoption of Service Changes

Service Changes are adopted as set forth on the Attached Exhibit A, which is incorporated into and made part of this Ordinance. In accordance with TriMet Code Section 22.05, new Schedule Notices shall be filed for the affected lines.

Section 2- Amendment of TriMet Code Chapter 22

TriMet Code Section 22.05 is amended to show the revised Route Designations set forth in the attached Exhibit A.

Section 3- Effective/Operative Dates

This Ordinance No. 353 shall take effect thirty days after the date of its Second Reading. Operative dates for specific Service Changes and revised Route Designations shall be as shown on the attached Exhibit A.

Dated: April 24, 2019



Presiding Officer

Attest:



Recording Secretary

Approved as to Legal Sufficiency:



Legal Department

Executive Summary

TriMet is proposing to implement several service improvements in fall 2019 and spring 2020. In accordance with Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B, TriMet conducts an Equity Analysis any time Major Service Changes are proposed to ensure that changes do not unfairly impact people of color and low-income populations. The service proposal includes Major Service Changes to nine bus lines. Thus, an analysis is required prior to the TriMet Board of Directors taking action.

Methodology

TriMet's Title VI Program outlines the agency's Major Service Change, Disparate Impact, and Disproportionate Burden policies, as well as the way in which TriMet conducts Equity Analyses. Major Service Changes are analyzed for both potential adverse effects and distribution of benefits. This is done at both the individual line-level and system-level, and the analysis seeks to identify any potential disparities based on race/ethnicity or income.

Major Service Changes

The proposed changes to nine existing lines meet TriMet's established thresholds for Major Service Changes:

- Line 19 – Woodstock/Glisan
- Line 22 – Parkrose
- Line 23 – San Rafael
- Line 25 – Glisan/Rockwood
- Line 30 – Estacada
- Line 32 – Oatfield Rd.
- Line 74 – 162nd Avenue
- Line 76 – Beaverton/Tualatin
- Line 78 – Beaverton/Lake Oswego

Findings

1. **No system level disparate impact or disproportionate burden** for the 8 major service increases.
2. The vast majority of improvements are on lines with **average-or-above minority populations** in their service areas. As a result, a greater share of the region's minority populations stand to **benefit** as compared to higher income populations.
3. All of improvements are on lines with **average-or-above low-income populations** in their service areas. As a result, a greater share of the region's low-income populations stand to **benefit** as compared to higher income populations.

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Attachment A: Analysis of impact on access to employment, education, health care, and food for minority and low-income populations

I. Background

Building upon several years of ongoing service improvements, TriMet's Annual Service Plan for FY2020¹ proposes Major Service Changes to nine bus lines. Other changes will involve route changes to improve reliability, travel time, and improvements to on-time performance for lines. Though these changes will represent improvements for riders on those lines, they are not large enough changes to be reviewed as Major Service Changes. The Major Service Changes presented here represent the large majority of TriMet's proposed changes for FY20. The TriMet Board's approval of a ten-year payroll and self-employment tax rate increase in 2015 makes the changes possible.

TriMet has engaged the community for the past few years to develop a shared vision for future transit service that will guide how the additional revenue is invested. Each year, TriMet staff will use information developed from the shared vision planning efforts and outreach, updated analyses and measures, and additional outreach to prioritize incremental service improvements for that year. The efforts will focus on five factors defined by the TriMet Board: *demand, productivity, connections, equity, and growth*. Each year's plan will also consider safety, budget availability, and availability of staff and equipment to provide for expanded service.

This report documents the equity analysis conducted for these changes.

II. TriMet Title VI Compliance

As a recipient of Federal Transit Administration ("FTA") financial assistance, TriMet must ensure that service changes – both increases and reductions – comply with Title VI of the Civil Rights Act of 1964, which states:

"No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

The FTA has provided specific implementing guidelines and regulations for complying with Title VI in Circular 4702.1B ("Circular"). The Circular instructs transit agencies to consider impacts of Major Service Changes on low-income populations as well as minority populations by conducting a service equity analysis. Figure 1 shows the general sequence of steps and considerations in the equity analysis process.

TriMet's Title VI Program² outlines the agency's policies, definitions and procedures for complying with Title VI and performing equity analyses. As required by the Circular, this includes the agency's Major Service Change, Disparate Impact, and Disproportionate Burden policies, as set forth below.

¹ Fiscal year 2020 runs from July 1, 2019 to June 30, 2020.

² TriMet's Title VI Program was updated and submitted to FTA in fall 2016

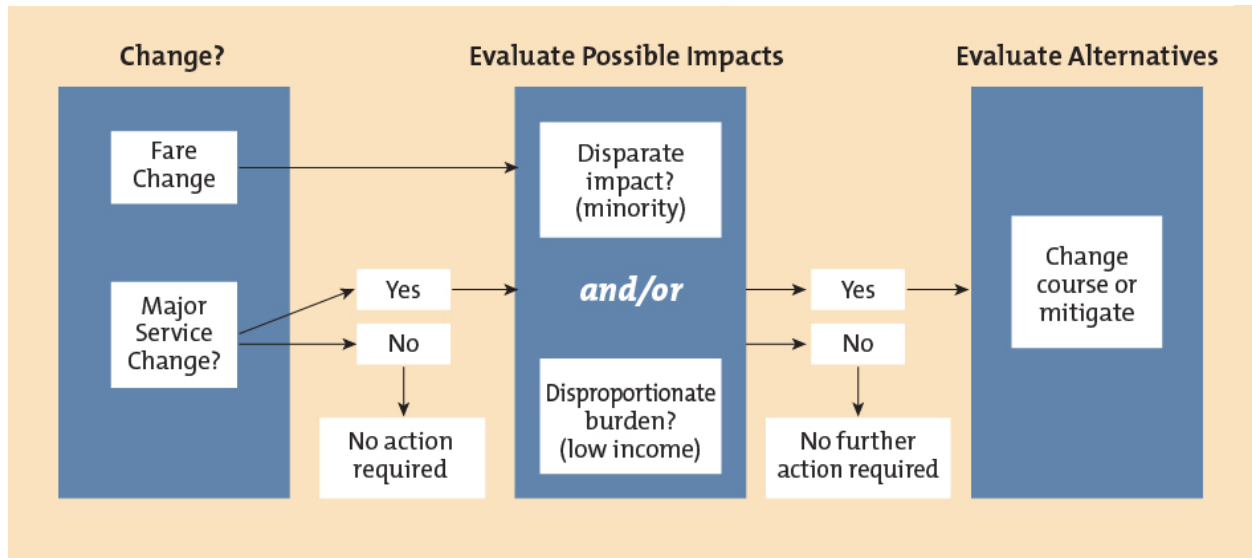
A. Major Service Change Policy

All changes in service meeting the definition of Major Service Change are subject to a Title VI Equity Analysis prior to Board approval of the service change. A Title VI Equity Analysis will be completed for all Major Service Changes and will be presented to the Board for its consideration and included in the subsequent TriMet Title VI Program with a record of action taken by the Board.

A **Major Service Change** is defined as:

1. A change to **15% or more of a line's route miles**. This includes routing changes where route miles are neither increased nor reduced (i.e. re-routes), or;
2. A change of **15% or more to a line's span** (hours) of service on a daily basis for the day of the week for which a change is made, or;

Figure 1: Overview of TriMet's Title VI Equity Analysis process



3. A change of **15% or more to a line's frequency** of service on a daily basis for the day of the week for which a change is made, or;
4. A single transit line is **split** into two or more transit lines, or;
5. A **new transit line** is established.

A Major Service Change occurs whether the above thresholds are met:

- a) Within a single service proposal, or;
- b) Due to a cumulative effect of routing, span, or frequency changes over the three years prior to the analysis

B. Disparate Impact Policy

Testing for Disparate Impact evaluates effects on minority riders or populations as compared to non-minority riders or populations. “Minority” is defined as all persons who identify as being part of racial/ethnic groups besides white, non-Hispanic.

In the course of performing a Title VI Equity Analysis for possible disparate impact, TriMet will analyze how the proposed major service change or fare change action could impact minority populations, as compared to non-minority populations.

In the event the proposed action has an adverse impact that affects protected populations more than other populations at a level that exceeds the benchmarks established in the adopted Disparate Impact Policy, or that restricts the benefits of the service change to protected populations, the finding would be considered as a potential Disparate Impact. Given a potential Disparate Impact, TriMet will evaluate whether there is an alternative that would serve the same objectives and with a more equitable impact. Otherwise, TriMet will take measures to minimize or mitigate the adverse impact of the proposed action.

The Disparate Impact Policy defines measures for determination of potential Disparate Impact on minority populations resulting from Major Service Changes or any change in fares. The policy is applied to both adverse effects and benefits of Major Service Changes. Adverse effects of service changes are defined as:

1. A decrease in the level of transit service (span in days and/or hours, and/or frequency); and/or
2. Decreased access to comparable transit service, which is defined as an increase of the access distance to beyond one-quarter mile of bus stops or one-half mile of rail stations.

The determination of disparate impact associated with service changes is defined separately for impacts of changes on an individual line, and for system-level impacts of changes on more than one line, as well as for both service reductions and service improvements.

1. In the event of potential adverse effects resulting from service reductions:
 - a) A Major Service Change to a *single line* will be considered to have a potential Disparate Impact if the percentage of impacted minority population in the service area of the line exceeds the percentage of minority population of the TriMet District as a whole by at least 3 percentage points (e.g., 31 percent compared to 28 percent).
 - b) To determine the *system-wide* impacts of Major Service Change reductions on more than one line, the percentage of the TriMet district’s minority population that is impacted is compared to the percentage of the TriMet district’s non-minority population that is impacted. If the percentage of the minority population impacted is at least 20 percent greater than the percentage of the non-minority population impacted (e.g., 12 percent compared to 10 percent), the overall impact of changes will be considered disparate.

2. In the event of service improvements:

- a) A major service change to a *single line* will be considered to have a potential Disparate Impact if:
 - i. The improvement is linked to other service changes that have disproportionate and adverse effects on minority populations, or;
 - ii. The percentage of impacted minority population in the service area of the line is less than the percentage of minority population of the TriMet District as a whole by at least 3 percentage points (e.g., 25 percent compared to 28 percent).
 - b) To determine the *system-wide* impacts of major service change improvements on more than one line, the percentage of the TriMet district's minority population that is impacted is compared to the percentage of the TriMet district's non-minority population that is impacted. If the percentage of the minority population impacted is at least 20 percent less than the percentage of the non-minority population impacted (e.g., 8 percent compared to 10 percent), the overall impact of changes will be considered disparate.
3. Additional considerations to complement the quantitative Disparate Impact analysis above may include evaluating impacts to accessing employment, education, food, or health care for minority populations.

Upon determination of Disparate Impact, TriMet will either:

- a) Alter the service proposal to avoid, minimize, or mitigate potential Disparate Impacts, or;
- b) Provide a substantial legitimate justification for keeping the proposal as-is, and show that there are no alternatives that would have a less Disparate Impact on minority riders but would still accomplish the project or program goals.

C. Disproportionate Burden Policy

Testing for Disproportionate Burden evaluates potential effects on low-income riders or populations, defined as at or below 150% of the federal poverty level. The line and system level evaluations are identical to those used to determine potential Disparate Impacts, but compare low-income and higher income populations rather than minority and non-minority populations.

III. Proposed Service Changes

A. Description of Changes

Table 1 lists the proposed service changes by the quarter in which they would take effect. All changes proposed for the next year are service increases.

Table 1: Proposed Service Changes in FY20 Annual Service Plan

Quarter	Line	Service Change Description
May 2019	22 - Parkrose	➤ Increase weekday frequency
	23 - San Rafael	➤ Increase weekday frequency
	25 - Glisan/Rockwood	➤ Increase weekday frequency
Fall 2019	19 - Woodstock/Glisan	➤ Route change
	30 - Estacada	➤ Add Sunday service
	32 - Oatfield Rd.	➤ Add Sunday service
Spring 2020	74 - 162nd Ave.	<ul style="list-style-type: none"> ➤ Add weekday peak service ➤ Add later trips during the weekday ➤ Add weekend service
	76 - Beaverton/Tualatin	<ul style="list-style-type: none"> ➤ Increase weekday midday frequency ➤ Increase weekend frequency
	78 - Beaverton/Lake Oswego	➤ Take over for Line 42-Denney/Hall

Note: The FY20 Annual Service Plan also includes some minor changes to several bus lines (20 and 70) for addressing reliability and capacity issues. These changes are not included in this analysis because they are too small to reach the Major Service Change threshold.

B. Major Service Change Test

To determine whether individual service changes meet the definition of Major Service Change, current and proposed service are compared in terms of route length, frequency, and span (hours) of service. Changes of 15% or more qualify as Major Service Changes, including changes meeting this threshold cumulatively over the course of three years.

Results of the comparison are shown in Table 2. To summarize, these changes meet TriMet’s adopted Title VI Major Service Change definition:

- Line 19 – Woodstock/Glisan:** Re-route
- Line 22 – Parkrose:** Frequency increase of over 15% on weekdays
- Line 23 – San Rafael:** Frequency increase of over 15% on weekdays
- Line 25 – Glisan/Rockwood:** Frequency increase of over 15% on weekdays
- Line 30 – Estacada:** New Sunday service
- Line 32 – Oatfield Road:** New Sunday service
- Line 74 – 162nd Avenue:** Frequency increase over 15% on weekdays: New weekend service
- Line 76 – Beaverton/Tualatin:** Frequency increase over 15% on weekdays
- Line 78 – Beaverton/Lake Oswego:** Re-route

Table 2: Results of Major Service Change Test By Line

Line	Change in Route Length	Change in Span	Change in Frequency	Line Split	New Line or New Service
Line 19 - Woodstock/Glisan	✓				
Line 22 - Parkrose (Weekday)			+30%		
Line 23 - San Rafael (Weekday)			+28%		
Line 25 - Glisan/Rockwood (Weekday)			+35%		
Line 30 - Estacada (Sunday)					✓
Line 32 - Oatfield (Sunday)					✓
Line 74 - 162nd Ave			+91%		
Line 74 - 162nd Ave (Saturday)					✓
Line 74 - 162nd Ave (Sunday)					✓
Line 76 - Beaverton/Tualatin			+114%		
Line 78 - Beaverton/Lake Oswego*	✓				

**Proposed routing change includes taking over for Line 42 between Beaverton Transit Center and Tigard Transit Center and then returns to its current route to Lake Oswego Transit Center. This results in earlier/later weekday service and weekend service on Denney Rd. and Hall Blvd. Change name to 78 Denney/Kerr Pkwy.*

C. Line-level Analyses

Having identified the service changes which meet the definition of Major Service Change, the next step in the analysis is to look at each line individually to determine potential Disparate Impacts (minority populations) and/or Disproportionate Burdens (low-income populations). Both service reductions and service increases are analyzed. For service increases, the analysis examines the extent to which the *benefits* of the improvements are inclusive of minority and low-income populations. The line-level analysis compares minority and low-income populations for the service area of each line proposed for a Major Service Change to the minority and low-income populations of the TriMet District as a whole. The analysis is separated by type of service change being proposed:

1. Major Service Reduction
2. Major Service Increases
3. Other Major Service Changes

1. Major Service Reduction

There are no Major Service Reductions in this service plan proposal.

2. Major Service Increases

For service increases, the analysis examines the extent to which the *benefits* of the improvements are inclusive of minority and low-income populations.

Figure 4 displays the minority population along each line proposed for a major increase as compared to the 26% Disparate Impact threshold. Figure 5 displays the low-income population along each line as compared to the 19% Disproportionate Burden threshold. Because these are proposed service increases, protected populations *falling below* these thresholds are flagged for potential concerns. The narrative analysis of each individual line follows, which includes further considerations of access to jobs, education, health care, and food for minority and low-income populations.

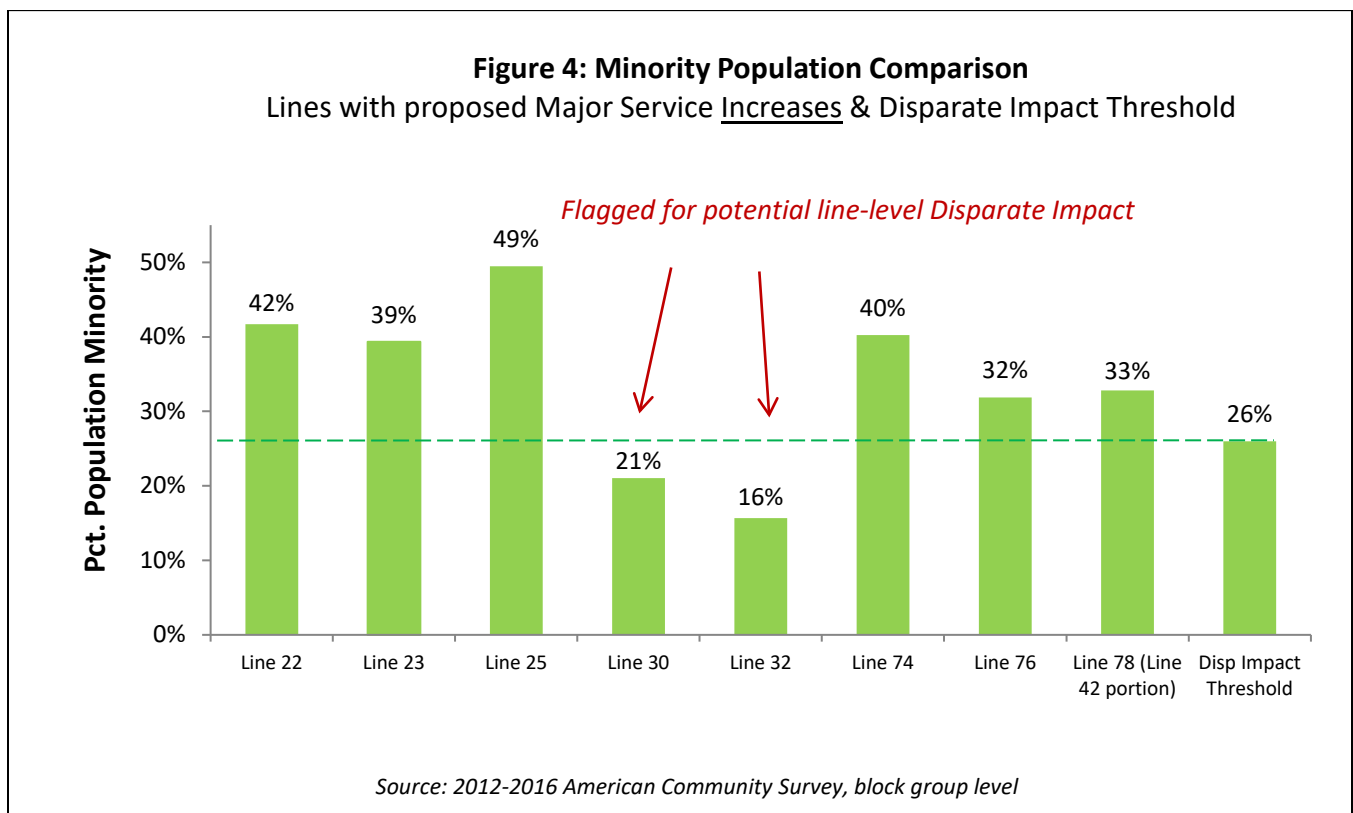
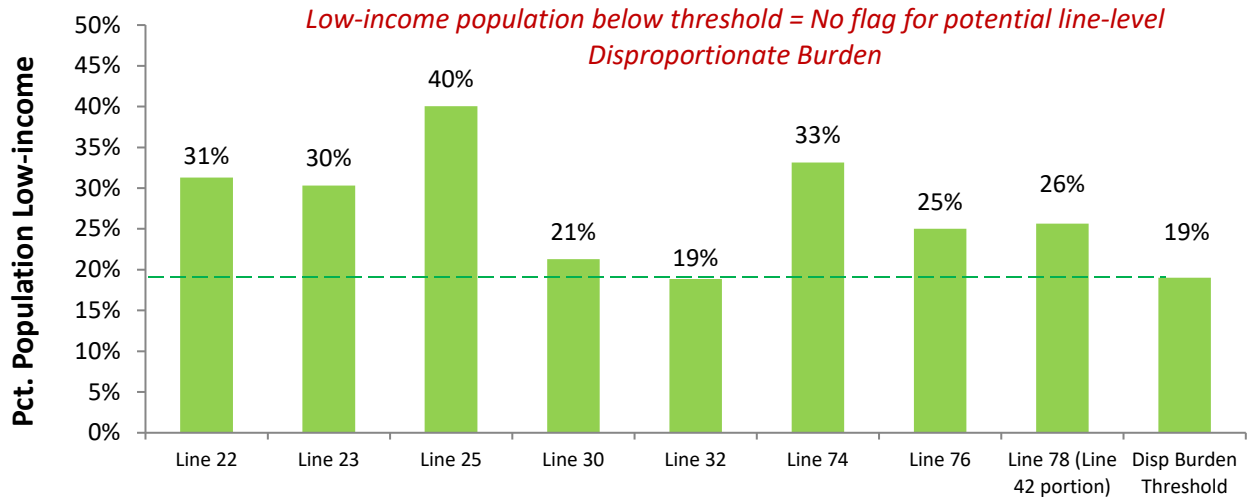


Figure 5: Low-income Population Comparison
 Lines with proposed Major Service Increases & Disproportionate Burden
 Threshold



Source: 2012-2016 American Community Survey, block group level. Low-income defined as at or below 150% federal poverty level.

➤ **Line 22 – Parkrose** (Weekday frequency increase)

This service increase would potentially benefit a service area population that is **42% minority** and **31% low-income**, which are at or above the Disparate Impact and Disproportionate Burden thresholds for Major Service Increases. Thus, there is **no Disparate Impact** and **Disproportionate Burden** at the line level.

In terms of access³, the frequency increase would improve service to:

- About 42,303 jobs
 - 57% are low-to-medium wage jobs, which is above the TriMet district average
 - 14% are jobs held by minorities, which is above the TriMet district average
 - 8% are jobs held by Hisp./Latino workers, which is similar to the TriMet district average
- 1 community college, 1 high school, 1 middle school, and 1 educational center
- 1 grocery stores/supermarkets
- 2 human and social services centers

➤ **Line 23 – Rafael** (Weekday frequency increase)

This service increase would potentially benefit a service area population that is **39% minority** and **30% low-income**, which are above the Disparate Impact and Disproportionate Burden thresholds for Major Service Increases. Thus, there is **no Disparate Impact** and **Disproportionate Burden** at the line level.

³ Access defined as within ¼ mile of a stop on the line. For full details of access to services by line, see Attachment A.

In terms of access, the frequency increase would improve service to:

- About 47,429 jobs
 - 56% are low-to-medium wage jobs, which is above the TriMet district average
 - 15% are jobs held by minorities, which is above the TriMet district average
 - 8% are jobs held by Hisp./Latino workers, which is similar to the TriMet district average
- 1 educational center
- 5 grocery stores/supermarkets, including 1 international grocer
- 2 human and social services centers

➤ ***Line 25 – Glisan/Rockwood (Weekday frequency increase)***

This service increase would potentially benefit a service area population that is **49% minority** and **40% low-income**, which are well above the Disparate Impact and Disproportionate Burden thresholds for Major Service Increases. Thus, there is **no Disparate Impact** and **Disproportionate Burden** at the line level.

In terms of access, the frequency increase would improve service to:

- About 12,495 jobs
 - 68% are low-to-medium wage jobs, which is well above the TriMet district average
 - 13% are jobs held by minorities, which is slightly above the TriMet district average
 - 9% are jobs held by Hisp./Latino workers, which is above the TriMet district average
- 2 educational centers
- 9 grocery stores/supermarkets, including 1 Hispanic grocer
- 10 human and social services centers

➤ ***Line 30 – Estacada (New Sunday service)***

This service increase would potentially benefit a service area population that is **21% minority**, which is below the Disparate Impact threshold (26%) for Major Service Increases. This indicates a **potential Disparate Impact**, calling for further examination, in particular the considerations below as well as the system-level analysis provided in the next section. The service area population is **21% low-income**, which is above the Disproportionate Burden threshold (19%) for Major Service Increases. Thus, there is **no Disproportionate Burden** at the line-level.

In terms of access, this added service would improve service to:

- About 136,897 jobs
 - 48% are low-to-medium wage jobs, which is less than the TriMet district average
 - 12% are jobs held by people of color, which is below the TriMet district average
 - 7% are jobs held by Hispanic/Latino workers, which is slightly less than the TriMet district average
- 3 middle schools, 3 high school, and 2 community colleges
- 4 community health care service centers
- 1 grocery store

➤ **Line 32 – Oatfield** (New Sunday service)

This service increase would potentially benefit a service area population that is **16% minority**, which is below the Disparate Impact threshold (26%) for Major Service Increases. This indicates a **potential Disparate Impact**, calling for further examination, in particular the considerations below as well as the system-level analysis provided in the next section. The service area population is **19% low-income**, which is equal to the Disproportionate Burden threshold (19%) for Major Service Increases. Thus, there is **no Disproportionate Burden** at the line-level.

In terms of access, this added service would improve service to:

- Over 43,889 jobs
 - 60% are low-to-medium wage jobs, which is greater than the TriMet district average
 - 9% are jobs held by minorities, which is slightly greater than the TriMet district average
 - 8% are jobs held by Hisp./Latino workers, which is similar to the TriMet district average
- 2 middle schools, 3 high schools, 1 community college, and 1 academy of the arts
- 3 employment resource center
- 9 human and social services centers
- 11 grocery stores/supermarkets

➤ **Line 74 – 162nd Ave** (Weekday frequency increase and new weekend service)

This service increase would potentially benefit a service area population that is **40% minority** and **33% low-income**, which are well above the Disparate Impact and Disproportionate Burden thresholds for Major Service Increases. Thus, there is **no Disparate Impact** and **Disproportionate Burden** at the line level.

In terms of access, the frequency increase would improve service to:

- About 43,840 jobs
 - 39% are low-to-medium wage jobs, which is less than the TriMet district average
 - 14% are jobs held by minorities, which is less than the TriMet district average
 - 5% are jobs held by Hisp/Latino workers, which is less than the TriMet district average
- 1 middle and high school
- 5 human and social services centers
- 6 grocery stores/supermarkets

➤ **Line 76 – Beaverton/Tualatin** (Weekday and weekend frequency increase)

This service increase would potentially benefit a service area population that is **32% minority** and **25% low-income**, which are above the Disparate Impact and Disproportionate Burden thresholds for Major Service Increases. Thus, there is **no Disparate Impact** and **Disproportionate Burden** at the line level.

The frequency increase would improve service to:

- Over 101,699 jobs
 - 56% are low-to-medium wage jobs, which is greater than the TriMet district average
 - 12% are jobs held by minorities, which is less than the TriMet district average
 - 9% are jobs held by Hisp./Latino workers, which is above the TriMet district average

- 2 high schools
- 4 grocery stores/supermarkets
- 7 human and social services centers
- 4 employment resource centers

➤ **Line 78 – Beaverton/Lake Oswego (Route change)**

The proposed route change will take over for Line 42 (Denney/Hall) adding **new weekend service** and **span improvements** for Line 42 riders. This service increase to the Denney/Hall portion would potentially benefit a service area population that is **33% minority** and **26% low-income**, which are above the Disparate Impact and Disproportionate Burden thresholds for Major Service Increases. Thus, there is **no Disparate Impact** and **Disproportionate Burden** at the line level.

In terms of access, the route change would improve service to:

- About 25,523 jobs
 - 63% are low-to-medium wage jobs, which is above the TriMet district average
 - 13% are jobs held by minorities, which is less than the TriMet district average
 - 9% are jobs held by Hisp./Latino workers, which is above the TriMet district average
- 1 middle school, 1 high school, and 1 youth program center
- 1 grocery stores/supermarket
- 1 human and social services center

3. **Other Major Service Changes**

One of the proposed changes, while qualifying as a Major Service Change, does not necessarily increase or reduce service. Evaluating potential distribution of adverse effects or benefits of the changes is not applicable, and therefore there is **no potential Disparate Impact** and **no potential Disproportionate Burden** under TriMet’s Title VI policies. Even so, TriMet still analyzed the details of the proposed changes for potential equity impacts.

➤ **Line 19 (Route streamlining, including service removal and one stop removal)**

The Line 19 route change would improve reliability by avoiding the congested curves on SW Sheridan Street. The change will serve SW Lincoln St. and SW 1st St. between the Transit Mall (SW 5th/6th avenues) and SW 1st & Arthur St. Doing so would remove service from a total of 4 stops, including both directions of service. The population in the surrounding area is **27% minority** and **28% low-income**.

A subsequent test for adverse effect is carried out for coverage removed. All four of these stops (which serve 224 daily ons/off) have comparable service within ¼ mile. Thus, the coverage removed from this route does not meet the definition of an *adverse effect* (see Table 3). In terms of service and access, this route change would neither add nor remove service. Therefore, the availability of transit service and access to existing jobs (i.e., low-to-medium wage jobs, jobs held by people of color and jobs held by Hispanic/Latino workers) will be maintained.

Table 3: Stops and populations impacted by routing changes to Line 19

	No. of Stops	Total daily ons/offers (weekdays)	Pct. Population Minority	Pct. Population Low-Income
Service Removed	4	224	27%	28%
<i>Nearest comparable service</i>				
Less than ¼ mile	4	224	27%	28%
Over ¼ mile*	-	-	-	-
<i>*Adverse effect applies</i>				

D. System-level Analysis

Because more than one line is proposed for a Major Service Change, a system-level analysis is required in addition to the line-level analysis. The system-level analysis aims to measure impacts of all Major Service Changes combined to determine how equitable the impacts would be across racial/ethnic and economic lines. Service increases and service reductions are analyzed separately in order to examine both potential system-level *adverse effects* and distribution of *benefits*.

➤ **System-level Disparate Impact Analysis: Major Service Increases**

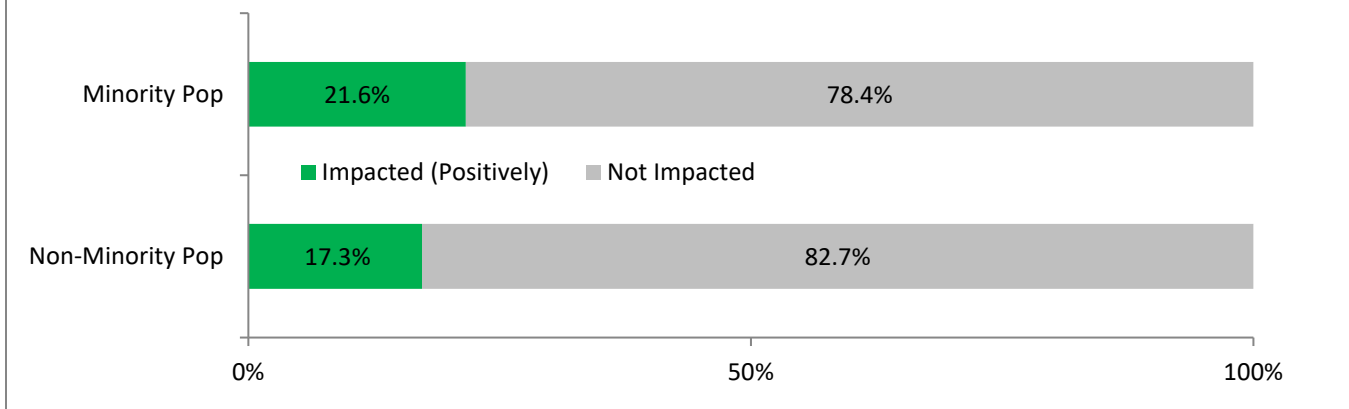
The system-level Disparate Impact analysis of Major Service Increases is completed by determining what portion of the TriMet District’s minority population stands to benefit from the Major Service Change improvements, and comparing that to the portion of the District’s non-minority population that potentially benefits. A potential Disparate Impact would exist if minority populations benefitted substantially less than non-minority populations. The way we measure this is to test whether 20% less (or 4/5) of the District’s minority than non-minority population stood to benefit from the improvements.

Table 4 and Figure 12 compare the positively impacted minority and non-minority populations. A greater percentage of the District’s minority population stands to benefit by the proposed Major Service Increase compared to the non-minority population (21.6% vs. 17.3%, respectively). Therefore, ***no System-level Disparate Impact*** is found related to the proposed Major Service Increases.

Table 4: System-level Disparate Impact Analysis of Major Service Increases

Pct. of TriMet District Non-Minority Pop Positively Impacted	Minority Pop Disparate Impact Threshold	Pct. of TriMet District Minority Pop Positively Impacted	Potential Disparate Impact?
17.3%	Less than 14%	21.6%	No

Figure 6: System-level Impacts of Proposed FY20 Major Service Improvements
Minority and Non-minority Populations



➤ **System-level Disproportionate Burden Analysis: Major Service Increases**

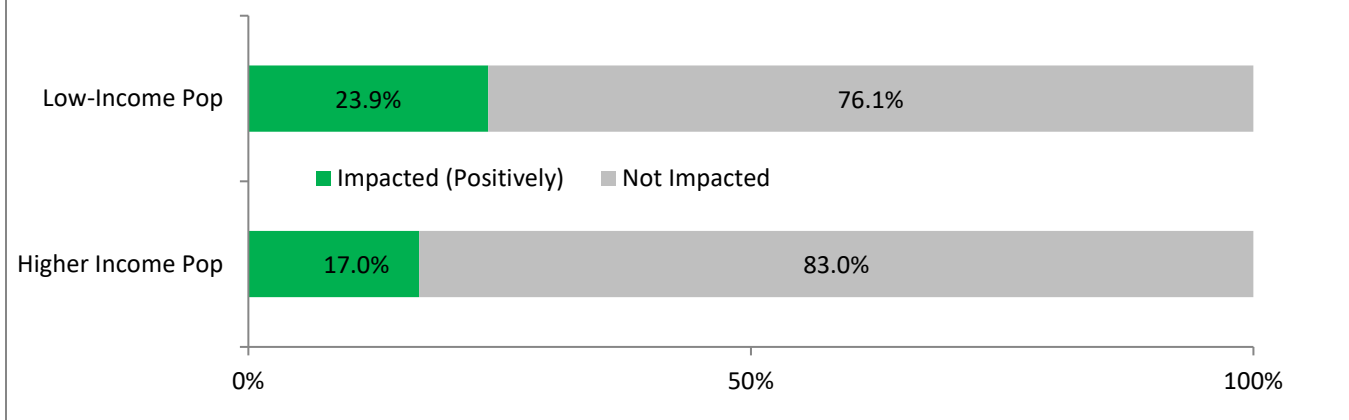
The System-level Disproportionate Burden analysis is completed by determining what proportion of the TriMet District’s low-income population is positively impacted by the Major Service Increases, and comparing that to the District’s higher income population that is positively impacted. “Higher income” includes all persons above the low-income threshold of 150% of the federal poverty level. A potential Disproportionate Burden would exist if low-income populations benefitted substantially less than higher income populations. The way we measure this is to test whether 20% less (or 4/5) of the District’s low-income than higher income population stands to benefit from the improvements.

Table 6 and Figure 14 compare the impacted low-income and higher income populations. A greater percentage of the District’s low-income population stands to benefit from the proposed Major Service Increases as compared to the higher income population (23.9% vs. 17%, respectively). Therefore, **no System-level Disproportionate Burden** is found related to the proposed Major Service Increases.

Table 6: System-level Disproportionate Burden Analysis of Major Service Increases

Pct. of TriMet District Higher Income Pop Positively Impacted	Low-Income Pop Disparate Impact Threshold	Pct. of TriMet District Low Income Pop Positively Impacted	Potential Disproportionate Burden?
17.0%	Less than 14%	23.9%	No

Figure 8: System-level Impacts of Proposed FY20 Major Service Increases
Low-income and Higher Income Populations



IV. Community Engagement

The service proposals analyzed in this report stem from a multi-year planning and outreach process to develop a vision for future transit service in the Portland metropolitan region. Divided by sub-region of the TriMet service district, these “Service Enhancement Plans” were undertaken to identify and prioritize opportunities to improve bus service as well as pedestrian and bike access to transit, given current and projected population and job growth. These are long-range plans which include dozens of bus service improvements beyond those proposed for implementation over the next year.⁴

An initial FY20 service plan was developed in fall 2018, at which point TriMet posted the proposed changes on trimet.org to solicit feedback, placed advertisements in newspapers across the service district, conducted on-board outreach and sent postcards to nearby residents of lines with proposed routing changes, presented the proposal to the Transit Equity Advisory Committee, sent emails to riders and other stakeholders, and staff held seven TriMet Open Houses. TriMet contracted with the Immigrant & Refugee Community Organization (IRCO) to design, promote, and help run the open house meetings. Open house attendees received HOP cards, while IRCO provided food, interpretation services, and daycare upon request. There were no modifications requested through the feedback and a majority of the comments were in support of the FY20 service proposal.

For the second phase of outreach, the updated plan was posted to trimet.org and many elements of the initial outreach phase were repeated (postcards, newspaper advertisements, emails). TriMet held three open houses on February 26, 2019 in East Portland/Gresham, February 27, 2019 in Beaverton, and February 28 in Downtown Portland to solicit feedback about the updated proposal. Finally, TriMet held a public hearing at its March 27, 2019 board meeting to receive comments on the proposed service changes.

⁴ For more information, go to <https://trimet.org/betterbus/serviceimprovements-fy20>

Responses overall were positive about the proposal. The following is a summary of themes across the feedback received:

Increasing the number of Frequent Service Lines is very popular among our customer base. Riders were especially pleased to learn about Line 20-Burnside/Stark becoming a Frequent Service Line. Additionally, riders were excited to learn that the upgrading of Line 76-Beaverton/Tualatin to Frequent Service will allow for Line 78-Beaverton/Lake Oswego to take over for Line 42-Denney/Hall, providing late night weekday and new weekend bus service to Vose and Metzger areas of Beaverton and Tigard.

Riders also supported the new Sunday service on Lines 30-Estacada and 32-Oatfield as well as the speed and reliability improvements that will come with the route change to Line 19-Woodstock/Glisan. East Portland riders were happy to learn about later weekday service and new weekend service on Line 74-162nd Ave. Finally, riders were also especially appreciative of the new weekend service in the Vose and Metzger communities afforded by the Line 78-Beaverton/Lake Oswego route change, allowing them more opportunities for traveling to and from work.

V. Summary of Findings

Table 7 on the next page summarizes the results of the line-level and system-level Disparate Impact and Disproportionate Burden analyses. As shown, Title VI concerns are minimal with the proposed FY20 Annual Service Plan. The proposal promises to improve service significantly for minority and low-income populations, with only two improvements (to the Lines 30 and 32) serving areas with relatively low minority populations as compared to the TriMet district. However, improving service on these lines does not raise concerns of an inequitable distribution of benefits given: a) the results of the system-level analysis; b) that the other 7 lines proposed for improvements did not have any line-level Disparate Impacts; and c) the 9 lines proposed for improvements did not have any line-level Disproportionate Burdens.

Table 7: Summary of Disparate Impact and Disproportionate Burden Analysis Results

		Potential Disparate Impact?	Potential Disproportionate Burden?
Major Service Reduction		-	-
Major Service Increases	22 – Parkrose	No	No
	23 – San Rafael	No	No
	25 – Glisan/Rockwood	No	No
	30 – Estacada	Yes	No
	32 – Oatfield	Yes	No
	74 – 162nd Avenue	No	No
	76 – Beaverton/Tualatin	No	No
	78 – Beaverton/Lake Oswego	No	No
	<i>Combined Improvements (System-level)</i>	No	No
Other Major Service Changes	19 – Woodstock/Glisan	No	No

Attachment A: Analysis of impact on access to employment, education, health care, and food for minority and low-income populations

Line 22 – Parkrose

Added frequency on Weekdays

Creates new access
 Improves access
 Removes access
 Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
<p>• <u>Improves</u> access to an estimated 42,303 jobs</p> <table border="1" style="margin-top: 10px;"> <caption>Bar Chart Data</caption> <thead> <tr> <th>Category</th> <th>Line 22 (%)</th> <th>TriMet District (%)</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>57%</td> <td>53%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>14%</td> <td>16%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>8%</td> <td>8%</td> </tr> </tbody> </table> <p style="text-align: center;"> ■ Line 22 ■ TriMet District </p> <p><small>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.</small></p>	Category	Line 22 (%)	TriMet District (%)	Low/Medium Wage Jobs*	57%	53%	Jobs Held by Workers of Color*	14%	16%	Jobs Held by Hispanic/Latino Workers*	8%	8%		<ul style="list-style-type: none"> • Parkrose HS • Parkrose Mid • IRCO Africa House • Mt. Hood Community College 	<ul style="list-style-type: none"> • IRCO 	<ul style="list-style-type: none"> • WINCO • Professional Plaza
Category	Line 22 (%)	TriMet District (%)														
Low/Medium Wage Jobs*	57%	53%														
Jobs Held by Workers of Color*	14%	16%														
Jobs Held by Hispanic/Latino Workers*	8%	8%														

Line 23 – Rafael

Added frequency on Weekdays

Creates new access
 Improves access
 Removes access
 Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
<p>• <u>Improves</u> access to an estimated 47,429 jobs</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <caption>Bar Chart Data</caption> <thead> <tr> <th>Category</th> <th>Line 23 (%)</th> <th>TriMet District (%)</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>56%</td> <td>53%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>15%</td> <td>16%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>8%</td> <td>8%</td> </tr> </tbody> </table> <p style="text-align: center;"> ■ Line 23 ■ TriMet District </p> <p><small>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.</small></p>	Category	Line 23 (%)	TriMet District (%)	Low/Medium Wage Jobs*	56%	53%	Jobs Held by Workers of Color*	15%	16%	Jobs Held by Hispanic/Latino Workers*	8%	8%		<ul style="list-style-type: none"> • IRCO Africa House 	<ul style="list-style-type: none"> • IRCO • Morrison Center Child and Family Services 	<ul style="list-style-type: none"> • WINCO (2 locations) • Safeway • International Market
Category	Line 23 (%)	TriMet District (%)														
Low/Medium Wage Jobs*	56%	53%														
Jobs Held by Workers of Color*	15%	16%														
Jobs Held by Hispanic/Latino Workers*	8%	8%														

Line 25 – Glisan/Rockwood

Added frequency on Weekdays

Creates new access
 Improves access
 Removes access
 Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
<p>• <u>Improves</u> access to an estimated 12,495 jobs</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <caption>Bar Chart Data</caption> <thead> <tr> <th>Category</th> <th>Line 25 (%)</th> <th>TriMet District (%)</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>69%</td> <td>53%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>15%</td> <td>16%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>9%</td> <td>8%</td> </tr> </tbody> </table> <p style="text-align: center;"> ■ Line 25 ■ TriMet District </p> <p><small>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.</small></p>	Category	Line 25 (%)	TriMet District (%)	Low/Medium Wage Jobs*	69%	53%	Jobs Held by Workers of Color*	15%	16%	Jobs Held by Hispanic/Latino Workers*	9%	8%		<ul style="list-style-type: none"> • IRCO Africa House • Latino Network 	<ul style="list-style-type: none"> • Human Solutions • Albertina Kerr • Ellenwood Adult Care Home • Impact NW • Addictions NW • City of Portland Family Services Division • Multnomah County WIC • IRCO • The Mentor Network 	<ul style="list-style-type: none"> • Albertsons • Rite Aid • Walgreens (5 locations) • La Tapatia Market • WINCO
Category	Line 25 (%)	TriMet District (%)														
Low/Medium Wage Jobs*	69%	53%														
Jobs Held by Workers of Color*	15%	16%														
Jobs Held by Hispanic/Latino Workers*	9%	8%														

Line 30 – Estacada

Adds Sunday service

Creates new access
 Improves access
 Removes access
 Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
<p>• <u>Improves</u> access to an estimated 136,897 jobs</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <caption>Bar Chart Data</caption> <thead> <tr> <th>Category</th> <th>Line 30 (%)</th> <th>TriMet District (%)</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>48%</td> <td>53%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>12%</td> <td>16%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>7%</td> <td>8%</td> </tr> </tbody> </table> <p style="text-align: center;"> ■ Line 30 ■ TriMet District </p> <p><small>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.</small></p>	Category	Line 30 (%)	TriMet District (%)	Low/Medium Wage Jobs*	48%	53%	Jobs Held by Workers of Color*	12%	16%	Jobs Held by Hispanic/Latino Workers*	7%	8%		<ul style="list-style-type: none"> • Clackamas Community College • Clackamas Middle College • Estacada High School • Alder Creek Middle • Estacada Junior High 	<ul style="list-style-type: none"> • North Clackamas DHS • Friends of Estacada Community Center • Helping Hands Home Care • Harewell Senior Care of Portland 	<ul style="list-style-type: none"> • Safeway
Category	Line 30 (%)	TriMet District (%)														
Low/Medium Wage Jobs*	48%	53%														
Jobs Held by Workers of Color*	12%	16%														
Jobs Held by Hispanic/Latino Workers*	7%	8%														

Line 32 – Oatfield

Adds Sunday service

Creates new access
 Improves access
 Removes access
 Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
<p>• <u>Improves</u> access to an estimated 43,889 jobs</p> <table border="1" style="margin-top: 10px;"> <caption>Bar Chart Data</caption> <thead> <tr> <th>Category</th> <th>Line 32 (%)</th> <th>TriMet District (%)</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>60%</td> <td>53%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>9%</td> <td>16%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>8%</td> <td>8%</td> </tr> </tbody> </table> <p style="text-align: center;"> ■ Line 32 ■ TriMet District </p> <p><small>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.</small></p>	Category	Line 32 (%)	TriMet District (%)	Low/Medium Wage Jobs*	60%	53%	Jobs Held by Workers of Color*	9%	16%	Jobs Held by Hispanic/Latino Workers*	8%	8%	<ul style="list-style-type: none"> • Arise Mentors • Sylvan Learning Center • Cascade Academics 	<ul style="list-style-type: none"> • Clackamas Community College • Oregon City High Program • Putnam High School • Rowe Middle • Milwaukie High • Kraxberger Middle • Clackamas Community College • Milwaukie Academy of the Arts 	<ul style="list-style-type: none"> • DHS District 15 • Senior Citizens Council of Clackamas • Parrott Creek Family Services • Morrison Center • Roth Senior Care • Family Stepping Stones • The Living Room • Los Nino Cuentan • Recovery Associations Project 	<ul style="list-style-type: none"> • Safeway (2 locations) • Rite Aid • Walgreens (5 locations) • Walmart • Albertsons • WB Mart • Milwaukie Grocery Outlet
Category	Line 32 (%)	TriMet District (%)														
Low/Medium Wage Jobs*	60%	53%														
Jobs Held by Workers of Color*	9%	16%														
Jobs Held by Hispanic/Latino Workers*	8%	8%														

Line 74 – 162nd Ave.

Added frequency on Weekdays and New Weekend service

Creates new access
 Improves access
 Removes access
 Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
<p>• <u>Improves</u> access to an estimated 43,840 jobs</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <caption>Bar Chart Data</caption> <thead> <tr> <th>Category</th> <th>Line 74 (%)</th> <th>TriMet District (%)</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>39%</td> <td>53%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>14%</td> <td>16%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>5%</td> <td>8%</td> </tr> </tbody> </table> <p style="text-align: center;"> ■ Line 74 ■ TriMet District </p> <p><small>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.</small></p>	Category	Line 74 (%)	TriMet District (%)	Low/Medium Wage Jobs*	39%	53%	Jobs Held by Workers of Color*	14%	16%	Jobs Held by Hispanic/Latino Workers*	5%	8%		<ul style="list-style-type: none"> • Open School East 	<ul style="list-style-type: none"> • Allied Health Services • Centennial Transition Center • Albertina Kerr Centers for Children • Morrison Center • My Fathers House 	<ul style="list-style-type: none"> • Safeway • Rite Aid • Walgreens (3 locations) • Walmart
Category	Line 74 (%)	TriMet District (%)														
Low/Medium Wage Jobs*	39%	53%														
Jobs Held by Workers of Color*	14%	16%														
Jobs Held by Hispanic/Latino Workers*	5%	8%														

Line 76 – Beaverton/Tualatin

Added frequency on Weekdays and Weekends

Creates new access
 Improves access
 Removes access
 Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
<p>• <u>Improves</u> access to an estimated 101,669 jobs</p> <table border="1" style="margin-top: 10px;"> <caption>Bar Chart Data</caption> <thead> <tr> <th>Category</th> <th>Line 76 (%)</th> <th>TriMet District (%)</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>56%</td> <td>53%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>12%</td> <td>16%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>9%</td> <td>8%</td> </tr> </tbody> </table> <p style="text-align: center;"> ■ Line 76 ■ TriMet District </p> <p><small>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.</small></p>	Category	Line 76 (%)	TriMet District (%)	Low/Medium Wage Jobs*	56%	53%	Jobs Held by Workers of Color*	12%	16%	Jobs Held by Hispanic/Latino Workers*	9%	8%	<ul style="list-style-type: none"> • Sylvan Learning Center • GED Prep • Village Home Education Resource Center • Durham Education Center 	<ul style="list-style-type: none"> • Tigard HS • Beaverton HS 	<ul style="list-style-type: none"> • Helping Hands for Seniors • Luke-Dorf Behavioral Health Service • Infinite Care Giving Services • Housing Independence • Comfort Keepers • Loving Care Providers • Rebuilding Together 	<ul style="list-style-type: none"> • Rite Aid • Haggen Food & Pharmacy • Grocery Outlet Beaverton • Albertsons
Category	Line 76 (%)	TriMet District (%)														
Low/Medium Wage Jobs*	56%	53%														
Jobs Held by Workers of Color*	12%	16%														
Jobs Held by Hispanic/Latino Workers*	9%	8%														

Line 78 – Beaverton/Lake Oswego

Route change to take over Line 42. Earlier/later weekday service and weekend service on Denney Rd. and Hall Blvd

Creates new access
 Improves access
 Removes access
 Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
<p>• <u>Improves</u> access to an estimated 25,523 jobs</p> <table border="1" style="margin-left: 20px;"> <caption>Bar Chart Data</caption> <thead> <tr> <th>Category</th> <th>Line 78 (Line 42 portion)</th> <th>TriMet District</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>63%</td> <td>53%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>13%</td> <td>16%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>9%</td> <td>8%</td> </tr> </tbody> </table> <p style="margin-left: 20px;"> ■ Line 78 (Line 42 portion) ■ TriMet District </p> <p><small>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.</small></p>	Category	Line 78 (Line 42 portion)	TriMet District	Low/Medium Wage Jobs*	63%	53%	Jobs Held by Workers of Color*	13%	16%	Jobs Held by Hispanic/Latino Workers*	9%	8%		<ul style="list-style-type: none"> Whitford Middle Westside Christian HS Janus Youth Programs 	<ul style="list-style-type: none"> Infinite Care Giving Services 	<ul style="list-style-type: none"> Grocery Outlet Beaverton
Category	Line 78 (Line 42 portion)	TriMet District														
Low/Medium Wage Jobs*	63%	53%														
Jobs Held by Workers of Color*	13%	16%														
Jobs Held by Hispanic/Latino Workers*	9%	8%														

Attachment M

30-Day Pass Elimination Fare Equity Analysis




Equity Analysis: 30 Day Pass Elimination

Department of Diversity & Transit Equity

March 15, 2018

Date: May 15, 2019

To: Board of Directors

From: Doug Kelsey 

Subject: **ORDINANCE NO. 354 OF THE TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET) ELIMINATING CERTAIN DAY PASSES AND PAPER TICKETS AND AMENDING TRIMET CODE CHAPTER 19 (SECOND READING)**

1. Purpose of Item

Ordinance No. 354 requests that the TriMet Board of Directors (Board) adopt an amendment to TriMet Code Chapter 19, Section 19.15A., eliminating 7-day, 14-day and 30-day passes and paper tickets as valid fare on the TriMet fixed-route system, and provide for a public hearing on the amendment. The amendment will not apply to fares for LIFT passengers, or bus transfer paper tickets, which will remain available as valid fare for cash-paying customers.

2. Type of Agenda Item

- Initial Contract
- Contract Modification
- Other: Ordinance

3. Reason for Board Action

TriMet fares and fare instruments are set forth in the TriMet Code, and the TriMet Code may be amended only by adoption of an ordinance.

4. Type of Action

- Resolution
- Ordinance 1st Reading
- Ordinance 2nd Reading

5. Background

Ordinance No. 354 eliminates the use of 7-day, 14-day and 30-day passes and paper tickets, but does not eliminate any fares for LIFT passengers or paper transfer tickets issued by bus operators for use by cash-paying bus passengers.

TriMet began alerting the public in January of 2018 about this change when we began converting our retailers from paper tickets to the Hop Fastpass®. TriMet engaged in extensive public outreach concerning this change utilizing all of its customer-facing channels to explain TriMet’s move to the Hop Fastpass®, the plan to eliminate these fare instruments and describing the implementation of its fare-capping program to the public. TriMet also conducted a Title VI analysis of the proposed elimination of these passes and paper fare instruments, and determined that there would be no disparate impact or disproportionate burden in moving forward with this change. Finally, during this

public outreach process, TriMet learned that these passes and paper fare instruments are not commonly used by TriMet's riders.

Because Ordinance No. 354 will not take effect until December 31, 2019, there will be sufficient time for the use or exchange of all such passes and paper tickets by any person who may currently possess them.

6. Financial/Budget Impact

By eliminating these fare instruments, TriMet will no longer incur the costs of procuring these paper products, approximately \$60,000 per year.

7. Impact if Not Approved

The Board may choose not to conduct a second reading for Ordinance No. 354 at its May 15, 2019, meeting. This option is not recommended because a first reading and public hearing on the Ordinance already took place. Moreover, the Agency is transitioning to the HOP Fastpass e-fare ticket system, and continued widespread use of the paper fare instruments is redundant and inefficient, and complicates the decisions our riders face when determining which fare is most advantageous for their particular circumstances.

ORDINANCE NO. 354

**ORDINANCE NO. 354 OF THE TRI-COUNTY METROPOLITAN
TRANSPORTATION DISTRICT OF OREGON (TRIMET) ELIMINATING
CERTAIN DAY PASSES AND PAPER TICKETS AND AMENDING TRIMET
CODE CHAPTER 19 (SECOND READING)**

The Board of Directors of the Tri-County Metropolitan Transportation District of Oregon (TriMet), pursuant to Oregon Revised Statutes Chapter 267, and after receiving, considering and approving the Title VI Report, and providing the opportunity for public testimony, does hereby ordain and decree the following Ordinance:


Section 1- Amendment of TriMet Code Chapter 19

TriMet Code Section 19.15A. is amended as shown in the attached Exhibit A, with deletions shown by ~~striking out~~, and additions shown in **bold**.

Section 2- Effective/Operative Date

This Ordinance No. 354 shall take effect on December 31, 2019.

Dated: May 15, 2019



Presiding Officer

Attest:



Recording Secretary

Approved as to Legal Sufficiency:



Legal Department

EXHIBIT "A" TO TRIMET ORDINANCE NO. 354,

AMENDING TRIMET CODE CHAPTER 19.15A - FARES

(Deletions are shown by ~~striking out~~ and additions are shown in **bold**.)

19.15 Fares.

A. Regular Transit Services:

The fares payable for use on the TriMet transit system shall vary according to the status of the rider and method of payment. Any person displaying a valid Low Income Fare identification card issued under TMC 19.05 is permitted to use as proof of payment any HONORED CITIZEN fare instrument, including eFare, described in this section. A valid Low Income Fare identification card qualifies as a TriMet Honored Citizen identification card when required to be displayed as proof of eligibility for an Honored Citizen fare. Persons eligible for the Low Income Fare are not eligible for the Honored Citizen Downtown Bus Pass.

The fares payable for use on TriMet shall be as follows:

(1) Monthly Passes ~~and 30-Day Passes~~

(a) <u>Status</u>	<u>Fare</u>
YOUTH	\$28.00
HONORED CITIZEN	\$28.00
ADULT	\$100.00

~~(b) A 30-Day Pass shall be valid for travel on any regularly scheduled TriMet route in accordance with the status of the rider for the period of thirty (30) consecutive days from the date of purchase.~~

(2) Pre-Paid Tickets

(a) <u>Status</u>	<u>Fare</u>
YOUTH	10/\$12.50
HONORED CITIZEN	10/\$12.50
ADULT	10/\$25.00

~~(b) Pre-paid unvalidated tickets may be used in the amount of their cash value for payment of additional fare, i.e., two Adult tickets may be used for an Adult 1-Day Pass. Refunds for overpayment will not be given.~~

(e) (a) Field Trip Group Discount ("Class Pass") Tickets

- (1) Groups whose members are 18 years of age or younger, traveling with at least 15 but not more than 35 members on the bus, or with at least 15 but not more than 70 members on MAX, including other persons aged 18 or older traveling with the

group as designated group leader(s) or chaperone(s), are eligible for the Field Trip Group Discount ("Class Pass") ticket. The cost of the ticket shall be \$1.00 per person. A ticket must be purchased for the trip. The ticket shall be valid for travel only for the date, route(s), time(s), and number of persons specified on the ticket. Each member must carry a ticket, or the group leader must carry a ticket for the group.

- (2) The group must schedule the trip at least 14 days in advance. Trips may be scheduled for weekdays or weekends using regularly scheduled service. Weekday trips must occur between the hours of 9:00 a.m. and 3:00 p.m. Specified trip times shall be at the discretion of TriMet. TriMet reserves the right to schedule trips according to anticipated available capacity on regularly scheduled service.

Possession of a Class Pass ticket in no way guarantees available vehicle capacity on scheduled trip times. In the event that all members of a group are unable to board the vehicle as specified on the Class Pass ticket, due to heavy passenger loads, the operator will arrange to have the Class Pass ticket be valid on the next regularly scheduled vehicle.

Groups wishing to reschedule a trip must cancel at least one business day in advance of the scheduled trip. Trips must be scheduled at least 14 days in advance of the new travel date. A new ticket will be issued to the group leader stating the new date, route(s), time(s), and number of persons in the group.

- (3) Class Pass tickets shall be available for purchase only at TriMet's Ticket Office at Pioneer Square, or by mail. Tickets must be purchased at least 14 days in advance. Tickets are nonrefundable, nontransferable, and shall not be laminated or duplicated.

~~(d)~~ (b) Event Fare

An Event Fare shall be available to events for all tickets for the event which are purchased and distributed in advance through ticket outlets. The Event Fare shall be \$2.50 per ticket per day, which shall be valid fare for travel, all hours on the day of the event(s) for which the ticket is purchased. Tickets for the event which are sold at the door shall not be included in the Event Fare program.

(3) Cash Fares

<u>Status</u>	<u>Fare</u>
YOUTH	\$1.25
HONORED CITIZEN	\$1.25
ADULT	\$2.50

(4) Annual Passes

(a) <u>Status</u>	<u>Fare</u>
YOUTH	\$308.00

HONORED CITIZEN	\$308.00
ADULT	\$1,100.00

- (b) Annual Passes must be purchased as one lump sum; installment payments are not permitted, except that: (1) employers who enter into a written annual agreement to purchase Annual Passes in a minimum dollar amount of \$6,050, may elect to make quarterly installment payments subject to administrative program requirements, and (2) employers who enter into a written annual agreement to purchase Annual Passes, where the Annual Pass year ends on August 31, shall receive a pro-rated per pass price in the sum of: the number of months remaining in the Annual Pass year X the Monthly Pass price X .92. The price paid by employers for Annual Passes under a written agreement is subject to adjustment to include any Adult Annual Pass fare increases adopted by the TriMet Board that take effect during the term of the agreement. Employers shall pay any Adult Annual Pass price increases during the term of the agreement in accordance with administrative program requirements. However, the total amount of increase shall not exceed 3% of the employer's per pass price that was in effect on September 1 (or the effective date of the agreement).

(5) Select Term Pass Program

- (a) Colleges with a campus(es) located within the TriMet district may purchase for their qualified students at that campus(es), Term passes in accordance with the Select Term Pass program requirements set forth in this Paragraph (5) and the administrative program requirements established for the fare. A "campus" means a building(s) located at one physical location within the TriMet district under the control of a college. "Qualified students" are either full-time or part-time students, as defined by the college administrative criteria, who attend class at a campus. The college shall be required to enter into a written contract for purchase of the Select Term Pass in accordance with the administrative program requirements established for the fare. The Select Term Pass fare instrument shall be valid for travel for the Term Pass fare period.
- (b) The Select Term Pass fare instrument shall consist of the student's college photo identification card with an affixed TriMet issued validation sticker, or a TriMet approved eFare Program card ("eFare card"), and must be carried by the student as proof of fare payment.
- (i) If using TriMet issued validation stickers, colleges shall provide the student with a photo identification card, which shall also include the college's name. The validation sticker must be placed on the photo identification card. A student's photo identification card with an affixed Term validation sticker shall be valid through the month and year designated on the sticker.
- (ii) Colleges may use a TriMet approved eFare card, which shall be required to display the college's name, the student's name, and may include the student's photo. If the approved eFare card does not include a photo, the student may be asked to display other valid photo identification as proof of their identity. Students are required to tap their eFare card prior to each vehicle boarding and upon occupying any district areas requiring proof of fare payment.
- (iii) Colleges shall verify student status before providing an individual with a Term Pass fare instrument. The Term Pass fare instrument may not be provided to or

used by non-students, is non-transferable, and is a valid fare instrument only for the person whose name appears on the card.

(c) The Term Pass fare period shall be established in the written contract with the college. During the contract period, the Select Term Pass price shall be calculated on a per Term basis (Term Pass fare period). The price of the Select Term Pass shall be the sum of the number of months in the Term times the Board adopted Adult Monthly Pass fares that will be in effect during that Term, less a discount of 10%. The price will not be pro-rated. The price paid by college for the Select Term Pass under a written contract is subject to adjustment to include any Adult Monthly Pass fare increases adopted by the TriMet Board that take effect during the term of the contract. Colleges shall pay any Select Term Pass price increases during the term of the contract in accordance with administrative program requirements.

(d) Only one pass may be sold to each qualified student per Term Pass fare period.

(6) 1-Day Pass

A 1-Day Pass shall be valid for travel on any regularly scheduled TriMet route, in accordance with the status of the rider, for the remainder of the service day in which the 1-Day Pass is valid.

<u>Status</u>	<u>Fare</u>
YOUTH	\$2.50
HONORED CITIZEN	\$2.50
ADULT	\$5.00

~~(7) 7-Day Pass~~

~~The 7-Day Pass shall be valid for travel on any regularly scheduled TriMet route in accordance with the status of the rider for the period of seven (7) consecutive days.~~

<u>Status</u>	<u>Fare</u>
YOUTH	\$7.50
HONORED CITIZEN	\$7.50
ADULT	\$26.00

(8) 14-Day Pass

~~A 14-Day Pass shall be valid for travel on any regularly scheduled TriMet route in accordance with the status of the rider for the period of fourteen (14) consecutive days as follows:~~

<u>Status</u>	<u>Fare</u>
YOUTH	\$14.50
HONORED CITIZEN	\$14.50
ADULT	\$51.00

(9) (7) Washington County Commuter Rail (WES) Service

Fares payable for use of Washington County Commuter Rail (WES) Service shall be the same as other regular fixed route fares established according to the status of the rider and the method of payment for travel as set forth in TMC Section 19.15.

Executive Summary: 30 Day Pass Elimination Equity Analysis

In accordance with Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B, TriMet conducts an equity analysis any time fare changes are proposed to ensure that changes do not unfairly impact people of color and low-income populations. The proposal to eliminate the 30-Day pass calls for such an analysis prior to the board taking action.

Methodology

TriMet's Title VI Program outlines the agency's Disparate Impact and Disproportionate Burden policies, as well as the way in which TriMet conducts fare equity analyses. In the case of the proposed fare product elimination, the analysis aimed to answer one main question: **does eliminating the 30-Day pass disproportionately impact minority and low-income riders?** To answer this question, staff utilized data from the most recent TriMet fare survey, conducted onboard in fall 2016.

Findings – Survey Data

Disparate Impact Analysis (Minority Riders)

The analysis found that minorities and non-minorities are likely to purchase 30-Day passes at similar rates, which suggests the potential impacts of the fare change are equally borne by minority and non-minority populations

- Therefore, the proposal to eliminate the 30-Day pass does not present a Disparate Impact.

Disproportionate Burden Analysis (Low-income Riders)

The analysis found that low-income and higher income riders are likely to purchase 30-Day passes at similar rates, which suggests the potential impacts of the fare change are equally borne by low-income and higher income populations.

- Therefore, the proposal to eliminate the 30-Day pass does not present a Disproportionate Burden.

Considerations – Sales Reports

A review of the 30-Day sales reports further suggests minimal impacts due to the overall low demand for this fare product. In fact, the 30-Day pass accounts for 0.77% of all TVM transactions and 0.95% of all mobile ticketing transactions. Furthermore, TVM ticket sales of 30-Day Passes have dropped 33% over a 6-month time period (July 2017 to December 2017).

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I. Background

TriMet will propose the elimination of the 30-day pass fare product at a date yet to be determined. This Title VI analysis is being conducted now in order to identify any potential impacts that may be pertinent to a more immediate Ticket Vending Machine (TVM) transition strategy.

TriMet introduced 30-day rolling passes less than 10 years ago, with the primary purpose of helping individuals who received income on a schedule that did not easily align with a calendar monthly pass period (e.g. Honored Citizen’s on Social Security get paid around the 3rd of month) as well as to help reduce the high volume of people buying calendar month passes at the TriMet Ticket Office at the end of each month. Currently, the 30-day pass can only be purchased through TVMs and the mobile ticketing application. The proposed policy would eventually eliminate this fare instrument altogether in order to simplify the overall fare structure and to align with the newly launched Hop electronic fare system.

II. Authority

As a recipient of Federal financial assistance, TriMet must ensure that fare changes comply with Title VI of the Civil Rights Act of 1964, which states:

“No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

The FTA has provided specific implementing guidelines and regulations for complying with Title VI in Circular 4702.1B (“Circular”). Due to the interrelated nature of race/ethnicity and income, the Circular instructs transit agencies to consider impacts on low-income populations as well as minority populations; the assessment of potential Title VI issues related to all fare changes¹ is completed through a fare equity analysis. Figure 1 shows the sequence of steps in the equity analysis process.

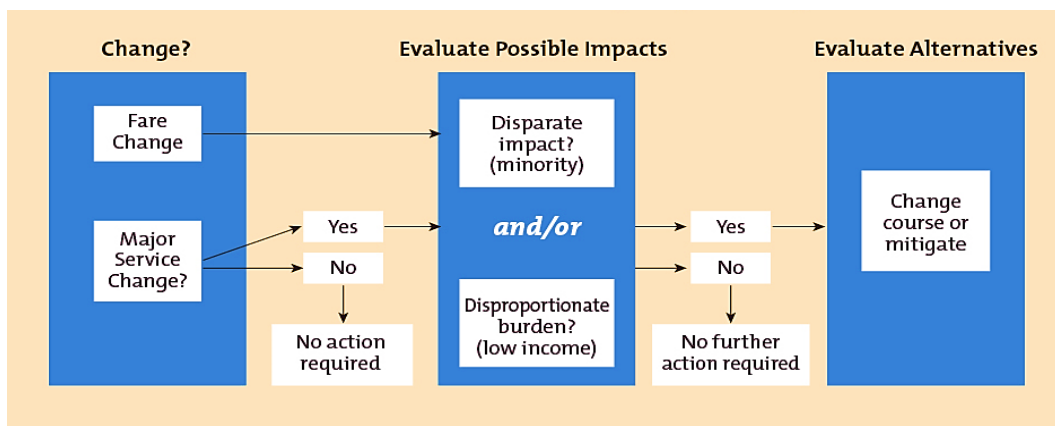


Figure 1: Overview of Title VI Equity Analysis

¹ FTA Circular 4702.1B – Chapter IV-11

III. Title VI Compliance

In the fall of 2016, TriMet updated its Title VI Program, which received concurrence by the Federal Transit Administration (FTA) in 2017. The program outlines agency policies, definitions and procedures for complying with Title VI and performing equity analyses. This includes the agency's fare change, Disparate Impact, and Disproportionate Burden policies.

A. Disparate Impact Policy

Testing for Disparate Impacts evaluates effects on minority riders or populations as compared to non-minority riders or populations. "Minority" is defined as all persons who identify as being part of racial/ethnic groups besides white, non-Hispanic.

Fare Changes

The fare equity analysis requirement applies to all fare changes regardless of the amount of increase or decrease. For proposed changes that would increase or decrease fares on the entire system, or on certain transit modes, or by fare payment type or fare media, the transit provider shall analyze any available information generated from ridership surveys indicating whether minority and/or low-income riders are disproportionately more likely to use the mode of service, payment type, or payment media that would be subject to the fare change².

For fare changes, a potential Disparate Impact is noted when the percentage of trips by minority riders using a fare option, in combination with the percentage price change for that option, has an impact that exceeds the comparable impact on non-minority riders. Differences in the use of fare options between minority and non-minority populations include all such differences that are documented as statistically significant at the 95 percent confidence level³.

B. Disproportionate Burden Policy

Testing for Disproportionate Burden evaluates potential effects on low-income populations. The analysis is similar to that used to determine potential Disparate Impacts, but comparing low-income – defined as at or below 150% of the federal poverty level – and higher income. Higher income includes all those above 150% of the federal poverty level.

If disparate impacts or disproportionate burdens are identified, the least discriminatory alternative must be implemented.

² FTA Circular 4702.1B – Chapter IV-19

³ TriMet's 2016 Title VI Program

IV. Proposed Fare Change

A. Description of Changes

This fare change includes the eventual elimination of the 30-day pass. An ordinance to do so will be brought forward to the Board at a later date. The elimination of the 7-day and 14-day passes would occur concurrently⁴. Presently, multi-day passes can only be purchased from TVMs and the mobile ticketing application. TVMs will be converted by summer of 2018, to sell 2 ½-hour tickets and 1-Day passes, which is consistent with Board Resolution 15-10-67 approved October 28, 2015. The mobile ticketing application would be phased out on a date yet to be determined. Ultimately, only 2 ½ hour, 1-Day, Month, and Annual passes will be offered in the Hop fare system. The decision for not integrating multi-day passes in the Hop fare system are shown in Table 1.

Table 1: Feasibility Considerations for Excluding Multi-Day Pass Options

Consideration	Detailed Explanation
Customer Experience	With a 1-Day Cap and 1-Month cap (calendar-based), customers always know when their cap resets. There is never a question of whether it is free for one more day or 7 more days – once you reach a cap the customer is good until the end of the month. With a rolling cap, customers simply will not be able to keep track.
Technology	Implementing the technology is feasible, but the 30-Day rolling option would complicate the back end system and the UX/UI would need to be designed for customers. There are many questions to answer in a simple UX/UI, which makes the system complex for users. The ultimate goal of UX and UI design is to make the user's interaction as time efficient and simple as possible.
Accounting	Accounting for a rolling pass makes the accounting drastically more complex. When addressing any reconciliation concerns, staff would have to look at each individual account to see when the cut off was. This would have a compounding effect if the issue was over a few months since staff would have to identify the capping time period.
Customer Service	The number of calls received by TriMet's call center for the electronic fare systems is nominal. Customers understand how the system works. Introducing a rolling cap, would drastically increase the number of calls because customers would be calling to ask when their cap resets, etc.
Fare Capping/Rolling Option	For the population of customers that still want a rolling cap concept, this can be achieved with the calendar-based fare cap.

⁴ In 2015, the agency contracted KFH Group Incorporated to complete a Title VI Fare Equity Analysis for the migration to an integrated electronic fare payment system. The analysis was completed on January 6, 2016. Part of this technical analysis included the elimination of the 7 and 14-day passes. As concluded in that report, there were no disparate impacts or disproportionate burdens found with the proposal and there were no high concerns identified through the public involvement process.

B. Data Sources

The 2016 TriMet on-board Fare Survey collected fare payment and demographic data necessary to conduct a fare equity analysis consistent with the policies described in Section III of this report. 30-Day sales reports (July 18, 2017 to December 31, 2017) from the Ticket Vending Machines, Mobile Ticketing Application, and TriMet’s Ticket Office were also utilized to inform the analysis.

C. Disparate Impact Analysis

The first step is to determine whether a proposed fare change includes a change in pricing levels by fare payment type. For this type of change, a potential Disparate Impact is noted when the percentage of trips by minority riders using a fare option, in combination with the percentage price change for that option, has an impact that exceeds the comparable impact on non-minority riders.

The current fare proposal involves no change in pricing levels (increase or decrease), but removes a payment option from TriMet’s overall fare structure. For this proposed change, the analysis examined whether trips by minority riders may bear a greater share of negative impacts, or experience a lesser share of the positive impacts than trips by non-minority riders. As shown in Table 2, the data indicates that trips by minorities and non-minorities are likely to purchase 30-Day passes at similar rates, which suggests the potential impacts of the fare change are equally borne by both minority and non-minority populations. Therefore, the analyses indicates no potential Disparate Impact for minority riders.

Table 2: Comparison of Minority Status for 30-Day Pass Purchases, By Location

TriMet 2016 Fare Survey

Purchase location	Weekdays	
	Non-minority Fares (n=4,412) ¹	Minority Fares (n=2,594)
Ticket Vending Machine	3%	3%
Mobile Ticketing Application	3%	2%
Subnet	6%	5%

¹n indicate weighted number of survey responses

Grey cells indicate statistically significant difference at the 95% confidence level

- **Thus, given the available data, TriMet finds no potential Disparate Impact on minority populations under this proposal to eliminate the 30-Day pass.**

D. Disproportionate Burden Analysis

The first step is to determine whether a proposed fare change includes a change in pricing levels by fare payment type. For this type of change, a potential Disproportionate Burden is noted when the percentage of trips by low-income riders using a fare option, in combination with the percentage price change for that option, has an impact that exceeds the comparable impact higher income riders.

The current fare proposal involves no change in pricing levels (increase or decrease), but removes a payment option from TriMet’s overall fare structure. For this proposed change, the analysis examined whether trips made by low-income riders may bear a greater share of negative impacts, or experience a lesser share of the positive impacts than higher income riders due to the elimination of the 30-Day pass. As shown in Table 3, the data indicates that low-income and higher income riders are likely to purchase 30-Day passes at similar rates, which suggests the potential impacts of the fare change are equally borne by both low-income and higher income populations. Therefore, the analyses indicates no potential Disproportionate Burden for low-income riders.

Table 3: Comparison of Income Status for 30-Day Pass Purchases, By Location

TriMet 2016 Fare Survey

Purchase location	Weekdays	
	Higher Income Fares (n=3,171) ¹	Low Income ² Fares (n=2,300)
Ticket Vending Machine	3%	3%
Mobile Ticketing Application	3%	2%
Subnet	6%	5%

¹n indicate weighted number of survey responses

Grey cells indicate statistically significant difference at the 95% confidence level

² Low-income defined as at or below 150% federal poverty level; Higher income is all others.

- **Thus, given the available data, TriMet finds no potential Disproportionate Burden on low-income populations under this proposal to eliminate the 30-Day pass.**

E. Fare Change Equity Analysis Conclusions

The proposed fare changes required a fare equity analysis to identify any potential disparate impacts on minority riders and/or disproportionate burden on low-income riders. The technical analysis using survey data found:

- No potential disparate impact on minority riders associated with the 30-Day pass elimination
- No potential disproportionate burden on low-income riders associated with the 30-Day pass elimination

The result of this equity analysis concludes that minority and low-income riders will not be limited or denied the benefits of the proposed fare changes.

F. Fare Sales and Hop Fastpass™ Considerations

Since the advent of Hop in July of 2017, the overall demand for 30-Day passes by TriMet’s ridership have been extremely low. In fact, only 0.85% of all transactions from TVMs and the mobile ticketing application between July 18, 2017 and December 31, 2017 were associated with the 30-Day pass. The sales reports further show that TVMs primarily serve infrequent riders and visitors, as only 0.77% of all TVM transactions are for 30-Day passes. Furthermore, only 0.95% of all mobile ticketing application transactions are for 30-Day passes. As shown in Table 4, a vast majority of the fare sales at TVMs and the mobile ticketing application are attributed to Single fare and 1-Day passes. A contributing factor is the ridership’s adoption of the Hop electronic fare system. The system’s pay-as-you-go pass feature eliminates the up-front cost of purchasing a calendar month pass. Moreover, the fare capping feature enables riders to purchase a monthly pass in smaller increments. Hop effectively provides the same pass product, with additional days allotted once the fare cap has been met.

Table 4: Percentage of Fare Sales by Fare Instrument

TriMet Ticket Vending Machines and Mobile Ticketing Application Sales Reports

Fares	2017					
	July	August	September	October	November	December
2.5 Hour Ticket	57.7%	60.7%	61.7%	63.1%	63.5%	63.9%
1-Day	39.8%	36.7%	35.8%	34.4%	34.1%	34.1%
30-Day	0.8%	0.9%	0.9%	0.9%	0.9%	0.8%
7 and 14-Day	1.8%	1.7%	1.4%	1.6%	1.5%	1.1%
TOTAL	100%	100%	100%	100%	100%	100%

V. Alternative to Address Findings

The findings of this analysis do not prompt TriMet to consider possible measures to avoid, minimize, and/or mitigate adverse impacts on minority or low-income riders. Albeit there were no adverse impacts presented, TriMet made the determination to move forward with a TVM Transition Outreach

Plan along with a TVM Conversion Strategy as a means to minimize impacted riders that purchase multi-day passes from TVMs. While the mobile ticketing application would eventually be phased out, it does provide a short-term option for multi-day pass users, as 87%⁵ of all TriMet riders have access to a smart phone.

VI. Community Engagement

TriMet’s initial public engagement efforts played an important role in the equity analysis process. Direct input from TriMet’s Transit Equity Advisory Committee (TEAC) and minority and low-income community members on the anticipated impacts of the 30-Day pass elimination complemented the above technical analysis by providing additional insights beyond the survey data analysis.

Common concerns identified through the public engagement were people with low income levels and people who are on a program that provides a 30-Day pass during the month. People with low income expressed their issue as being they have so many bills due at the beginning of the month and they wait for their mid-month paycheck to purchase their transit passes. Additionally, they are transit dependent and need to ride more than 20 days per month – the 30-Day pass is a better value than purchasing 30 1-Day passes. The second concern (i.e., programs that provide 30-Day passes) were most often related to the need to provide people with a transit subsidy that does not start on the first of the month, due to the nature of their program.

Transit Equity Advisory Committee (TEAC)

TriMet’s Transit Equity Advisory Committee reviewed the proposal and Title VI equity analysis and provided several recommendations. A point of focus for the Committee was the availability of and access to the 30-Day pass during the transition to eliminate this fare product from all channels of sales. Although the newly launched Hop electronic fare system will garner a multitude of benefits in general, there is still concern for low-income riders to realize the full benefits of the fare capping, at least until the launch of the Low Income Fare Program in July of 2018 and the Hop retail network is completely established (500 plus locations). One strategy identified by TEAC to help address the aforementioned concern may be engaging in targeted communication throughout the transition in order to build support of this proposal. A second recommendation is to offer multi-day passes in various locations (i.e., TVMs and/or retail outlets) throughout the service district.

⁵ 2017 TriMet Attitude and Awareness Survey

TVM Conversion Strategy and Outreach Plan

Although there were no disparate impacts or disproportionate burdens identified in the Title VI equity analysis, TriMet established a conversion strategy and outreach plan to mitigate any potential impacts unforeseen in the TVM upgrades.

The TVM conversion entails removing multi-day pass options and upgrading 254 machines to vend Single 2 ½ hour tickets and 1-Day passes. Several factors inform the conversion strategy and timeline. The first was whether a TVM is located in a high concentrated area of minority and/or low-income populations. This was completed using a ¼ of a mile buffer around each TVM and evaluating if the surrounding census blocks were above TriMet's service district average for minority and low-income (28% and 24%, respectively). The second factor included 30-Day pass sales reports over a six-month period (July 2017 to December 2017). The sales reports indicated the total transactions for each location ranged from 20 to 700 sales over the course of 6 months. If sales counts were above 300 for a particular location, the TVMs in those locations were flagged as an above average frequented TVM. The combination of both factors identified 30 out of 104 locations to be preserved until the later part of the project. Ultimately, the conversion work plan (i.e., a beta test and 8 stages) will serve as a guide for the Fare Equipment Maintenance (FEM) journey workers. Staff recommended this strategy to the FEM Manager and Project Lead on March 5, 2018. Concurrence of the recommendation was received on March 7, 2018.

The conversion strategy supported the development of the outreach plan. TriMet will launch a TVM transition outreach plan to educate riders and the general public. The objective is to inform all impacted riders and the TriMet community about the forthcoming upgrades as well as the timeline for the transition to full system implementation of the new TVMs.

Attachment N

TriMet Service Guidelines Policy

Resolution 14-12-60

Exhibit A

TriMet Service Guidelines Policy

Policy Statement

TriMet's mission is to provide valued transit service that is safe, dependable, and easy to use. Each year in service of this mission, TriMet develops an Annual Service Plan that provides for managing service, expands service when financially sustainable, and reduces service when necessary.

By adopting a Service Guidelines Policy, the TriMet Board of Directors ("Board") provides policy and strategic direction to the General Manager on the priority considerations that drive service planning decisions in how it identifies and executes service changes, and will be addressed in each year's Annual Service Plan. To implement this policy direction, the General Manager will approve a TriMet Service Guidelines Framework document once public comment is compiled.

Reporting

- The Annual Service Plan will be published each year and should include the five priority considerations adopted in these Service Guidelines.
- The General Manager should direct staff to refine tools and approaches to better understanding and communicating effectiveness regarding the five priority considerations for service planning, and update a detailed Service Guidelines Framework document as needed to most effectively address the five priority considerations.

Service Guidelines

The TriMet Board hereby adopts the following five priority considerations to provide the framework for service planning decision-making:

- **Equity** - TriMet's services and business opportunities are open to everyone in our community. TriMet operates with fairness and equity for all. TriMet complies with Title VI of the Civil Rights Act, and also strives to ensure that the decisions of where and when to serve are made through an equity lens, considering the needs of low-income populations, people of color, people with disabilities, and other communities of concern. Equity is a lens through which the other following considerations should be considered.
- **Demand** - Service should respond to changes in demand for mobility and access via transit.
- **Productivity** – Productivity (measured in boarding rides per vehicle hour) measures the cost-effectiveness of the service provided. Productivity should be understood in the context of the need to provide service across the district as well as challenges such as last-mile connections or partnering with other agencies or service providers to meet the needs of specific areas with comparatively lower demand.
- **Connections** - Connections to jobs, to school, and other high priority places for communities. These can include key locations such as job centers, schools, colleges, training centers, and neighborhood housing.
- **Growth** – Growth in population and employment in various parts of the region should help inform service decisions and service should support the needs of this growth.

Attachment O

Data from 2018 On-board Fare Survey

Trip Characteristics and Demographics for Race/Ethnicity and 150% Federal Poverty Level 2018 Fare Survey

Weekday – Bus, MAX, WES

Weighted to originating rides

Cells may not add to 100% due to rounding

Shaded cells: Significantly higher at the 95% confidence level for comparison groups:

Minority/non-minority, at or below FPL/above FPL

	RACE/ETHNICITY		INCOME	
	Minority 36% n=4,427	Non-minority 64% n=7,925	At/below 150% FPL 36% n=3,538	Above 150% FPL 64% n=6,255
Time period when survey was distributed				
AM Peak	20%	23%	15%	27%
Midday	43%	41%	51%	36%
PM Peak	26%	27%	23%	29%
Evening	10%	9%	11%	9%
Route where survey was distributed – group 1				
MAX	60%	58%	67%	52%
Bus	40%	41%	33%	48%
WES	0%	0%	0%	1%
Route where survey was distributed – group 2				
MAX	40%	41%	33%	48%
Frequent Service Bus	33%	30%	39%	25%
Other Bus	27%	28%	28%	27%
WES	0%	0%	0%	1%
Route where survey was distributed – group 3				
MAX	40%	41%	33%	48%
Bus radial	36%	36%	37%	35%
Bus crosstown	16%	16%	21%	12%
Bus westside feeder	6%	3%	5%	3%
Bus eastside feeder	3%	3%	4%	2%
WES	0%	0%	0%	1%
Language of survey				
English	99%	100%	99%	100%
Spanish	1%	0%	1%	0%

	RACE/ETHNICITY		INCOME	
	Minority 36% n=4,427	Non-minority 64% n=7,925	At/below 150% FPL 36% n=3,538	Above 150% FPL 64% n=6,255
5. Where did you first start this one-way trip?				
Your home	49%	48%	50%	48%
Usual workplace	21%	27%	19%	33%
College/University (students only)	8%	4%	7%	3%
Shopping	4%	4%	5%	2%
Personal business (bank, post office)	3%	3%	4%	2%
Social visit (friends/relatives)	3%	3%	4%	2%
School (K-12)	5%	2%	2%	1%
Medical appointment/doctor's visit	2%	2%	3%	1%
Recreation, sightseeing	2%	2%	2%	1%
Eating/dining out	1%	1%	1%	1%
Other business related	1%	1%	1%	1%
Airport, Amtrak, Greyhound, Bolt Bus terminal	1%	1%	1%	1%
Hotel	1%	1%	0%	1%
Pick up/drop off someone (daycare, school)	0%	0%	0%	1%
Sporting event	0%	0%	0%	0%
Other	0%	0%	0%	0%
6. Where will you finally end this one-way trip?				
Your home	39%	40%	37%	41%
Usual workplace	25%	30%	23%	36%
College/University (students only)	8%	4%	8%	3%
Social visit (friends/relatives)	5%	4%	6%	3%
Personal business (bank, post office)	4%	4%	6%	3%
Shopping	4%	3%	6%	2%
Recreation, sightseeing	3%	3%	4%	3%
School (K-12)	5%	2%	2%	1%
Medical appointment/doctor's visit	2%	2%	3%	1%
Other business related	1%	2%	2%	2%
Eating/dining out	2%	2%	1%	2%
Airport, Amtrak, Greyhound, Bolt Bus terminal	1%	1%	1%	1%
Pick up/drop off someone (daycare, school)	1%	0%	1%	0%
Hotel	0%	1%	0%	0%
Sporting event	0%	0%	0%	0%
Other	0%	0%	0%	-

	RACE/ETHNICITY		INCOME	
	Minority 36% n=4,427	Non-minority 64% n=7,925	At/below 150% FPL 36% n=3,538	Above 150% FPL 64% n=6,255
8. How did you get to the first stop from your starting location?				
Walked	89%	87%	93%	84%
Drove & parked	4%	7%	2%	9%
Dropped off	4%	4%	3%	4%
Bicycled	1%	2%	2%	2%
Ride hailing/Uber/Lyft/Taxi	0%	0%	0%	0%
Shuttle	0%	0%	0%	0%
Other bus/MAX	0%	0%	0%	0%
Carpooled & parked	0%	0%	0%	0%
Tram	0%	0%	0%	0%
Car sharing/Car2go/Zipcar	0%	-	0%	0%
Flew/train	0%	0%	0%	0%
Other	-	0%	0%	0%
9. How will you get to your ending location?				
Walk	90%	88%	93%	86%
Drive	4%	6%	1%	8%
Get picked up	4%	3%	3%	3%
Bicycle	1%	2%	2%	2%
Ride hailing/Uber/Lyft/Taxi	0%	0%	0%	0%
Shuttle	0%	0%	-	0%
Carpool	0%	0%	0%	0%
Other bus/MAX	0%	0%	0%	0%
Tram	0%	0%	0%	0%
Flew/train	-	0%	0%	0%
Car sharing/Car2go/Zipcar	0%	0%	0%	0%
Other	0%	0%	0%	0%
10-12. How many transfers did you make before boarding this bus/rail?				
None	72%	75%	69%	78%
NET: Transfer =====	28%	25%	31%	22%
1	24%	21%	26%	19%
2	4%	3%	5%	3%
3	0%	0%	0%	0%
4	0%	0%	0%	0%
5	0%	0%	0%	0%
Mean	0.3	0.3	0.4	0.3

	RACE/ETHNICITY		INCOME	
	Minority 36% n=4,427	Non-minority 64% n=7,925	At/below 150% FPL 36% n=3,538	Above 150% FPL 64% n=6,255
14. Did you pay for this trip by tapping a Hop card or ticket, or mobile phone, at a Hop reader? (Asked of everyone)				
No, I didn't tap but paid some other way (includes paper ticket, monthly pass, etc.)	78%	76%	76%	75%
NET: Hop =====	21%	24%	23%	25%
Yes, using a plastic Hop card	13%	19%	16%	19%
Yes, using a mobile wallet, like Android Pay, Apple Pay, Samsung Pay	4%	3%	4%	4%
Yes, using a single paper Hop 2-1/2 hour ticket	2%	1%	1%	1%
Yes, using a single paper Hop Day Pass	1%	1%	1%	1%
Yes, using a contactless bank card	1%	1%	1%	1%
Yes, using a Hop card added to my phone (Virtual)	0%	0%	-	0%
Don't know	1%	1%	1%	0%
15. Which fare did you use for this trip? (Asked if Q14=not Hop or dk) (Streetcar or C-TRAN, answer this and then skip to Q27)				
TriMet fare	99%	100%	100%	100%
C-TRAN fare	0%	0%	0%	0%
Streetcar fare	0%	0%	0%	0%
16. Which fare type do you have? (Asked of everyone on-board TriMet vehicles) (Not Streetcar/C-TRAN)				
Adult	71%	76%	67%	86%
Honored Citizen	11%	18%	23%	11%
Youth	18%	7%	9%	3%
LIFT	0%	0%	0%	0%

	RACE/ETHNICITY		INCOME	
	Minority 36% n=4,427	Non-minority 64% n=7,925	At/below 150% FPL 36% n=3,538	Above 150% FPL 64% n=6,255
17. Did you pay with a ... (NOT HOP)				
NET: Single ticket/book of 10 =====	24%	25%	26%	24%
Single 2-1/2 hour ticket (includes cash)	23%	23%	25%	22%
Book of 10 2-1/2 hour tickets	1%	2%	1%	2%
NET: Annual Pass =====	25%	25%	16%	29%
Employee ID with TriMet sticker	11%	16%	4%	23%
College ID with TriMet sticker	7%	5%	8%	3%
High School ID with embedded TriMet logo	6%	3%	3%	1%
Annual Pass	1%	1%	0%	1%
Honored Citizen Downtown Pass	0%	0%	0%	0%
Monthly/30-Day Pass =====	25%	23%	27%	21%
NET: Day Pass/book of 5 =====	22%	23%	26%	21%
1-Day Pass (includes cash)	21%	21%	25%	19%
Book of 5 1-Day Passes	1%	2%	1%	2%
NET: Other =====	4%	4%	5%	4%
7-Day Pass	2%	2%	2%	2%
Other	1%	1%	1%	1%
14-Day Pass	1%	1%	1%	1%
19. Where did you purchase or get your fare for this trip? (NOT HOP and NOT Annual, employee ID, school ID, HC downtown pass)				
Mobile Ticket App	23%	31%	23%	35%
On-board the vehicle	21%	18%	25%	14%
Ticket Vending Machine	20%	19%	17%	22%
Work	8%	10%	6%	13%
Retail store	9%	8%	9%	7%
School	10%	4%	6%	2%
Social Service agency	5%	4%	8%	2%
TriMet Ticket Office	3%	4%	4%	4%
Someone gave it to me	1%	1%	1%	0%
On-line/in the mail	0%	0%	0%	0%
Cash	0%	0%	0%	0%
Other	0%	0%	0%	0%

	RACE/ETHNICITY		INCOME	
	Minority 36% n=4,427	Non-minority 64% n=7,925	At/below 150% FPL 36% n=3,538	Above 150% FPL 64% n=6,255
20. Is your single-fare payment being used for a one-way or a round-trip? (Asked if single-fare) (YES HOP and NO HOP)				
One-way trip	77%	79%	72%	82%
Round-trip	23%	21%	28%	18%
21. How many one-way trips will you make on your Day Pass today? (YES HOP type: single paper/Day Pass OR NOT HOP type single paper/Day Pass)				
Mean	2.6	2.6	2.8	2.4
22. Where did you purchase or get your fare for this trip? (YES HOP type: single paper ticket, Day Pass)				
TVM	58%	58%	43%	70%
Work	14%	7%	8%	13%
TTO	9%	7%	13%	4%
School	5%	8%	10%	3%
Retail store	4%	6%	5%	3%
On-board bus	5%	4%	8%	2%
Social Service agency	1%	6%	6%	1%
Someone gave it to me	2%	2%	4%	1%
On-line	2%	1%	1%	1%
App	1%	1%	-	2%
Cash	-	1%	1%	-
Other	0%	1%	1%	-
23. How did you add fare to your Hop card? (YES HOP type: Plastic Hop Card)				
Website (myhopcard.com)	29%	42%	30%	42%
Provided by my employer or college	23%	19%	11%	25%
Mobile App	20%	17%	21%	17%
Retail store	13%	13%	19%	9%
TriMet Ticket Office	6%	4%	6%	4%
Provided by a social service agency	6%	2%	9%	1%
By phone (1-844-MYHOPCARD)	1%	1%	2%	0%
Some gives to me	0%	0%	0%	0%
Other	1%	1%	2%	0%

	RACE/ETHNICITY		INCOME	
	Minority 36% n=4,427	Non-minority 64% n=7,925	At/below 150% FPL 36% n=3,538	Above 150% FPL 64% n=6,255
24. Before Hop, where did you purchase or get your fare? (check all that apply) (YES HOP-all Hop)				
Mobile Ticket App	24%	26%	22%	28%
Ticket Vending Machine	27%	24%	29%	24%
On-board the vehicle	24%	18%	28%	14%
Retail store	13%	19%	20%	16%
Work	9%	14%	6%	17%
TriMet Ticket Office	8%	9%	10%	8%
School	7%	3%	5%	2%
On-line	3%	3%	2%	4%
Didn't take transit before	2%	2%	2%	2%
Social Service agency	2%	2%	5%	1%
Someone gave it to me	0%	0%	0%	0%
Other	1%	1%	1%	1%
25. How many one-way trips will you make on transit today? (YES HOP, not paper HOP)				
Mean	2.4	2.3	2.6	2.3
26. Are you completing a round-trip on transit in 2-1/2 hours? (YES HOP, not paper HOP)				
No	65%	71%	62%	73%
Yes	28%	26%	33%	24%
Don't know	6%	4%	5%	4%
27. How many trips have you made on a TriMet bus or MAX or WES in the last 7 days?				
Mean	10.1	9.4	10.8	9.1
27. How many trips have you made on a TriMet bus or MAX or WES in the last 7 days? Grouped				
NET: Frequent/Regular rider =====	90%	88%	91%	88%
Frequent rider (rider almost every day)	57%	59%	61%	58%
Regular rider (rider several times a week)	32%	29%	30%	29%
NET: Occasional/Frequent rider =====	10%	12%	9%	12%

	RACE/ETHNICITY		INCOME	
	Minority 36% n=4,427	Non-minority 64% n=7,925	At/below 150% FPL 36% n=3,538	Above 150% FPL 64% n=6,255
Occasional rider (ride a couple of times/month)	9%	10%	8%	10%
Infrequent rider (ride < a couple times/month)	1%	2%	1%	2%
28. How did you usually make this trip before Tilikum Crossing opened?				
I made this trip the same way as today	48%	50%	47%	52%
I did not make this trip, because I didn't go to this destination before.	27%	24%	26%	22%
I did not make this trip, because I moved to this area	17%	17%	18%	16%
Used a different bus/MAX/WES/Streetcar route	3%	5%	4%	5%
Drove	3%	4%	3%	5%
Dropped off/picked up	1%	0%	1%	0%
Bicycled	0%	1%	0%	1%
Walked	0%	0%	0%	0%
Carpooled	0%	0%	0%	0%
Other	0%	0%	0%	0%
Transit Dependency – based on number of vehicles in household and driver's license				
NET: Transit dependent =====	60%	44%	70%	32%
Driver's license - no	42%	25%	42%	16%
No car	19%	19%	28%	16%
Driver's license - yes	40%	56%	30%	68%
29. Do you have a current driver's license?				
Yes	48%	66%	43%	78%
No	52%	34%	57%	22%
30. Including yourself, how many people live in your household?				
Mean	3.4	2.9	3.8	2.5
31. Including yourself, how many people in your household work outside the home?				
Mean	2.1	1.9	2.2	1.8
32. How many working cars, trucks, vans or motorcycles are there in your household?				
Mean	1.4	1.4	1.1	1.4

	RACE/ETHNICITY		INCOME	
	Minority 36% n=4,427	Non-minority 64% n=7,925	At/below 150% FPL 36% n=3,538	Above 150% FPL 64% n=6,255
33. Are you a college student?				
No	75%	85%	73%	88%
Yes, full-time	16%	9%	18%	7%
Yes, part-time	8%	6%	9%	5%
34. Which college do you attend? (check all that apply)				
PSU	44%	44%	44%	48%
Portland Community College	31%	27%	29%	27%
Clackamas Community College	5%	7%	5%	5%
Mount Hood Community College	5%	4%	5%	4%
Pacific University	2%	2%	2%	2%
OHSU	1%	2%	2%	3%
University of Portland	2%	1%	1%	1%
Concordia University	2%	1%	1%	1%
Pacific NW College of Art	0%	1%	1%	0%
Art Institute of Portland	1%	1%	1%	0%
Oregon Culinary Institute	1%	1%	1%	1%
Reed College	1%	0%	1%	0%
Lewis & Clark College	1%	0%	0%	1%
U of O	0%	1%	1%	0%
Oregon State Univ.	0%	0%	0%	0%
Other	8%	12%	10%	12%
35. What is your race or ethnicity? (grouped into one response)				
Non-minority	-	100%	57%	73%
Minority	100%	-	43%	27%
35. What is your race or ethnicity? (grouped into one response)				
Caucasian/White	-	100%	57%	73%
Hispanic/Latino	26%	-	12%	6%
Bi-racial or multi-racial	26%	-	12%	7%
Asian/Pacific Islander	20%	-	5%	7%
African American/Black	20%	-	9%	5%
American Indian/Alaskan Native	4%	-	2%	1%
Other	4%	-	2%	1%

	RACE/ETHNICITY		INCOME	
	Minority 36% n=4,427	Non-minority 64% n=7,925	At/below 150% FPL 36% n=3,538	Above 150% FPL 64% n=6,255
35. What is your race or ethnicity? (check all that apply)				
Caucasian/White	13%	100%	63%	76%
Hispanic/Latino	32%	-	15%	7%
African American/Black	24%	-	11%	6%
Asian/Asian American	22%	-	7%	8%
Bi-racial or multi-racial	14%	-	6%	4%
American Indian/Alaskan Native	8%	-	5%	2%
Pacific Islander	4%	-	2%	1%
Middle Eastern/North African	3%	-	1%	1%
Other	3%	-	1%	1%
36. What is your age?				
NET: Millennial and younger =====	69%	49%	66%	43%
Under 18	16%	6%	7%	2%
18-24	27%	15%	29%	11%
25-34	26%	28%	30%	30%
NET: Gen X =====	23%	33%	23%	40%
35-44	15%	18%	13%	23%
45-54	9%	14%	9%	16%
NET: Boomer and older =====	8%	18%	11%	18%
55-64	5%	12%	7%	12%
65 or more	3%	7%	4%	6%
37. Which do you identify with?				
Male	51%	51%	48%	52%
Female	47%	47%	48%	47%
Transgender	1%	1%	2%	1%
Other	1%	1%	1%	1%

	RACE/ETHNICITY		INCOME	
	Minority 36% n=4,427	Non-minority 64% n=7,925	At/below 150% FPL 36% n=3,538	Above 150% FPL 64% n=6,255
38. What was your total annual household income before taxes in 2017?				
Under \$10,000	16%	10%	41%	-
\$10,000 - \$19,999	10%	9%	32%	-
\$20,000 - \$29,999	11%	11%	18%	11%
\$30,000 - \$39,999	9%	9%	8%	13%
\$40,000 - \$49,999	6%	7%	1%	12%
\$50,000 - \$59,999	4%	6%	0%	10%
\$60,000 - \$69,999	3%	5%	0%	8%
\$70,000 - \$79,999	3%	4%	0%	7%
\$80,000 - \$89,999	2%	4%	0%	6%
\$90,000 - \$99,999	2%	4%	0%	7%
\$100,000 - \$124,999	3%	7%	-	11%
\$125,000 - \$150,000	3%	4%	-	7%
Over \$150,000	2%	6%	-	8%
Don't know	25%	14%	-	-
150% FPL (based on income + number in HH)				
Above 150% FPL	53%	69%	-	100%
At/below 150% FPL	47%	31%	100%	-
40. Is English your native language?				
Yes	71%	98%	87%	92%
No	29%	2%	13%	8%
41. If no, what is your native language?				
Spanish	46%	2%	52%	30%
Other	10%	17%	9%	13%
Chinese	9%	-	6%	10%
Vietnamese	7%	0%	6%	8%
Tagalog	4%	-	2%	6%
Japanese	4%	-	2%	2%
Arabic	3%	2%	5%	1%
Russian	0%	22%	2%	5%
French	2%	8%	3%	3%
German	0%	15%	1%	2%
Hindi	2%	-	1%	2%
Korean	2%	-	1%	1%
Somali	2%	-	3%	0%
Portugese	1%	4%	1%	2%
Romanian	0%	8%	0%	2%

	RACE/ETHNICITY		INCOME	
	Minority 36% n=4,427	Non-minority 64% n=7,925	At/below 150% FPL 36% n=3,538	Above 150% FPL 64% n=6,255
Tamil	1%	-	0%	2%
Dutch/Danish/Norwegian/Swedish	0%	7%	0%	1%
Urdu	1%	-	-	2%
Ukrainian	0%	4%	1%	0%
Swahili	1%	-	1%	-
Napaili	1%	-	1%	1%
Hmong	1%	-	1%	0%
Italian	0%	4%	-	1%
Turkish	-	5%	0%	0%
Indonesian	1%	-	0%	1%
Amharic	1%	-	0%	0%
Farsi	0%	1%	0%	1%
Thai	1%	-	1%	-
42. How well do you speak English? (Spanish survey)				
Very well	58%	76%	57%	74%
Well	28%	19%	31%	22%
Not well	11%	5%	10%	3%
Not at all	3%	-	2%	1%

Attachment P

2019 Title VI Program Update Outreach Materials



Title VI

2019 Program Update

*East County Caring
Committee*

May 2, 2019

1333 NW Eastman Pkwy,
Gresham, OR 97030

Carl Green Jr.
Title VI and Equity Programs
Administrator





Title VI of the Civil Rights Acts of 1964

“No **person** in the United States shall, on the grounds of **race, color** or **national origin**, be excluded from participation in, be denied the benefits of, or be subjected to **discrimination** under **any program or activity** receiving **Federal Financial assistance.**”

Survey Question 1 and 2

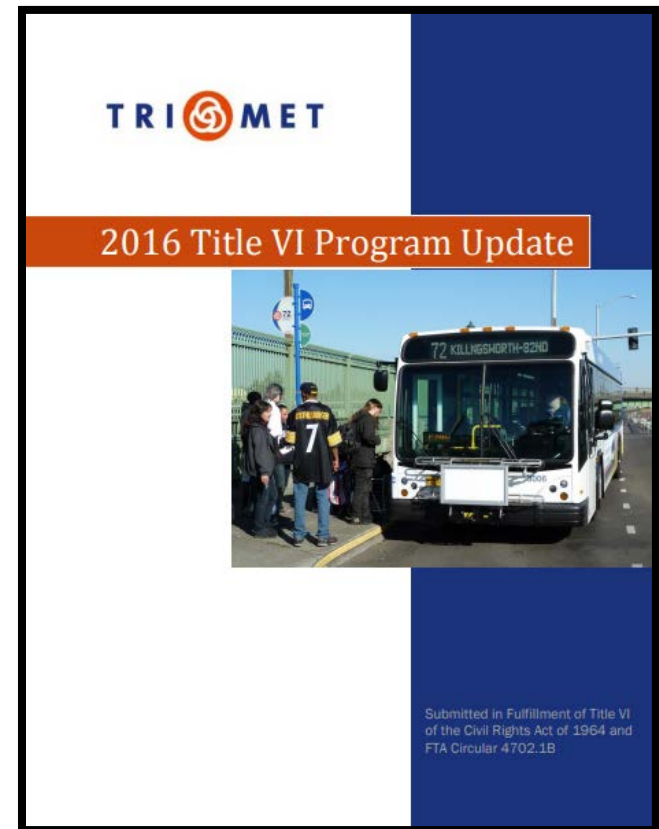
Title VI/Transit Equity Goals

- Equal access
- Fair distribution of resources and opportunities
- Full and fair participation in public transportation decision making
- Meaningful access to transit-related programs for limited English proficiency populations
- Ensure people of color and low-income riders are not unfairly affected by agency level decisions or projects

Survey Question 3

Implementing Title VI

- FTA Title VI Circular & TriMet Title VI Program
 - Policies and standards to ensure equity and prevent discrimination in providing transit service
 - Key evaluation tools: Equity Analysis, Service Monitoring, and Community Engagement



Survey Question 4

Major Service Changes

Policy that requires an equity analysis when:

- adding or removing a new line/route
- splitting a line/route
- 15% change in frequency, span of service, length
- Cumulative changes meeting the 15% threshold over a 3 year period

2016 Update included the change from 25% to 15% making TriMet's MSC policy the most sensitive in the country.

Disparate Impact & Disproportionate Burden Policies

Policy that examines impact at line level

- Percent minority/low-income along route compared to service district average

Policy that examines impact at system level

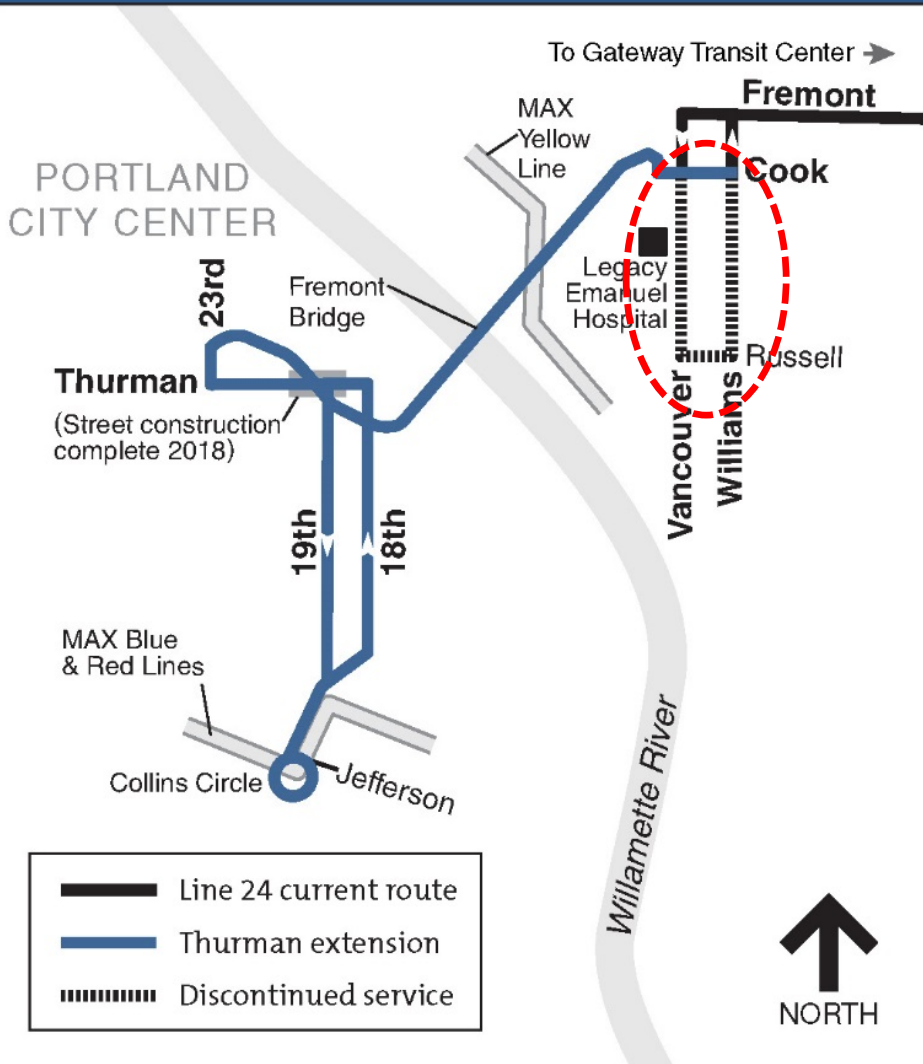
- Comparing minority/low-income vs. non-minority/higher income that stand to benefit/burden from the service proposal

2016 Update included the assessment of access to jobs, healthcare, schools and food.

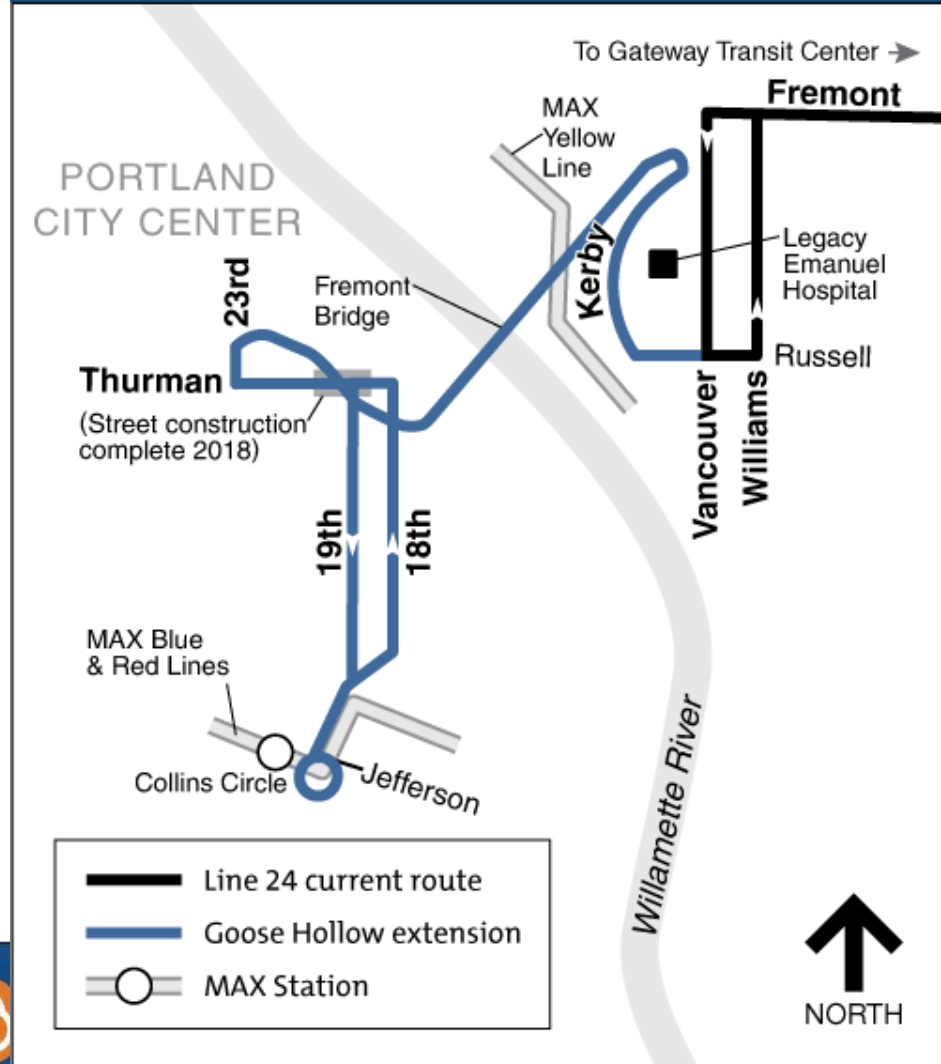
Survey Question 5 - 8

Application of Title VI

Line 24-Fremont extension to NW Portland and Goose Hollow



Line 24-Fremont extension to NW Portland and Goose Hollow



Survey Question 9

Fare Changes

Policy that requires an equity analysis for:

- any change in fare, regardless of the amount of the increase or decrease

Survey Question 10

Successful Mitigations and TriMet's Commitment to Transit Equity

Low Income Fare Program

Access Transit Program

- Fare Relief – discounted fares to nonprofits
- Fare Assistance – small grants in the form of fares

HOP Retail Network = 500+ locations

... and many more!

Location of Site or Facility Siting Analysis

Title VI analysis will occur during the planning stage

Must occur before the selection of the preferred site

Engage in outreach to areas potentially impacted

Compare the equity impacts of various siting alternatives

Examples include: storage facilities, maintenance facilities, and operations centers.

- 4th Operations and Maintenance Base Equity Analysis

Service Performance Monitoring

INTERNAL BUSINESS PRACTICES GOAL 1: Deliver Safe, Efficient, and Equitable Service

OBJECTIVE	MEASURE	TARGET
16. Ensure equitable distribution of services and resources across the TriMet system	Compare minority and/or low-income access to that of non-minority and/or non-low-income access across six different measures: <ul style="list-style-type: none">■ Revenue hours provided■ Vehicle loads■ On time performance■ Service availability■ Stop amenities■ Vehicle assignment	■ Minority and low-income access must be within 5% or better than non-minority and non-low income access ⁵

Conduct annual review of resource distribution and implement needed service adjustments to reach equity targets

Application of Title VI

Equity Metric: Service Standards Fall 2017												
Metric Minority and non-minority comparison by mode and for the system as a whole	<=20% Difference			<=10% Difference			<=5% Difference			As good or better on minority lines		
	B u s	M A X	S t r o p h o l i t i c a n	B u s	M A X	S t r o p h o l i t i c a n	B u s	M A X	S t r o p h o l i t i c a n	B u s	M A X	S t r o p h o l i t i c a n
Vehicle Loads If the average load of minority lines is above the maximum load factor, comparison to average load of non-minority lines.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Service Frequency & Span Revenue hours of service provided on minority vs. non-minority lines.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
On-Time Performance Average percent on-time for minority vs. non-minority lines.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✗	✗
Vehicle Assignment Average age of vehicles serving minority vs. non-minority lines.	✓	✓	✓	✗	✓	✗	✗	✓	✗	✗	✗	✗
Service Availability Percentage of minority vs. non-minority population within ½ mile of service.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

FALL 2017 Report

FALL 2018 Report

Vehicle Assignment Average age of vehicles serving minority vs. non-minority lines.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✗	✓	✗
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Survey Question 11

Review of TriMet's Title VI Program

- Title VI Program – Board Adopted
 - System Wide Policies and Standards
 - Service, Fare, Facility Siting Analyses
 - Service Performance Monitoring
 - Complaint Management Program
 - Limited English Proficiency Access Plan
 - Sub-recipient Monitoring

Survey Questions 12 - 14

Submit Surveys

TriMet's Proactive Equity

- Lead with Title VI Program – Floor not a ceiling
- Transit Equity Advisory Committee – May 2013
 - Support the development of TriMet's transit equity strategy. Serve as a sounding board and as a link to community organizations
- Targeted Community Engagement
- Staff dedicated specifically to transit equity
- Transit Equity Index
- Disadvantage Business Enterprise Program
- Partnerships with human & social service agencies, CBOs, FBOs, advocacy groups, & Community Leaders
- Equity Lens 2019-2022

Questions/Comments

TriMet is committed to a public transportation system where all are welcome.

Your responses to the following questions will help us improve our Civil Rights/Title VI program and ensure safer, more inclusive, and accessible services for everyone.

* 1. Before today, were you aware that TriMet has a Civil Rights/Title VI Program?

- Yes (Proceed to Question 2) No (SKIP to Question 3)

* 2. What parts of the program are you familiar with?

- Equity Analyses
 Service Performance Monitoring
 Language Access Plan
 Nondiscrimination Complaints Management
 Other (please specify)

* 3. One goal of this program is to ensure people of color and low-income riders are not unfairly affected by service or fare changes.

Do you feel this is important?

- Yes No

The Title VI Program includes research methods and analysis, standards, and policies to ensure equity is a priority when making transit decisions.

* 4. Did you know that TriMet performs an equity analysis whenever major service changes (increases and/or reductions in service) are proposed?

- Yes No

* 5. When service changes are proposed, TriMet looks at how different populations would be affected as well as how access to jobs, schools, health care and food would change.

Do you think anything else should be considered?

- Yes No

* 6. Describe:

* 7. Have you experienced a change to a bus line you ride?

- Yes (Proceed to Question 8) No (SKIP to 9)

* 8. Was the change positive or negative?

- Positive -

Describe:

- Negative –

What could TriMet have done to lessen the impact (besides not making the change)?

* 9. Did you know that TriMet performs an equity analysis whenever fare changes (increases or reductions in fare prices, or changes in payment types) are proposed?

Yes No

The fare equity analysis includes looking at the impacts (positive and negative) on people of color and low-income populations.

* 10. What should TriMet consider when making changes to fares such as increases or decreases, or changes to payment options?

Performance standards ensures transit service is safe, dependable, responsive, easy, and inviting. These standards include service design and operations practices, such as the distribution of new buses, increasing service frequency, the availability of service and where certain amenities are placed.

* 11. Before today, were you aware that TriMet established service performance standards and policies to ensure equity is a priority when making service improvements?

Yes No

To ensure our riders are treated fairly and with dignity and respect, TriMet is required to have a Civil Rights complaints management program to include procedures for filing a complaint.

12. Before today, were you aware that TriMet has procedures to address discrimination complaints?

Yes No

As part of the commitment to Title VI, transit agencies are required to ensure access and fair treatment of riders regardless of their National Origin. This includes populations that speak, write, and read English less than very well.

* 13. TriMet has recently committed to updating its Language Access Plan to ensure meaningful access to people with limited English proficiency.

Do you feel this should be a top priority?

Yes No

* 14. If you would like to receive periodic updates (monthly to quarterly) on TriMet's Title VI Program, please provide your name and email address below.

NAME

EMAIL

Encuesta sobre programa de derechos civiles

TriMet se compromete a tener un sistema de transporte público donde todos sean bienvenidos.

Tus respuestas a las siguientes preguntas nos ayudan a mejorar nuestro Programa de Derechos Civiles/ Título VI y asegurar un servicios accesibles, seguros e inclusivos para todos.

* 1. Antes de hoy, estabas al tanto de nuestro Programa de Derechos Civiles/ Título VI?

Sí No

* 2. Que parte del programa ya conocías?

- Análisis de Equidad
- Monitoreo del rendimiento del servicio
- Monitoreo del Plan de acceso a idiomas
- Administración de quejas sobre discriminación
- Otro (favor de especificar)

3. Una de las metas del programa es de que los pasajeros de bajos ingresos y las personas de color no sean afectadas injustamente por los cambios al servicio o los cambios en las tarifas.

Consideras que esto sea importante?

Sí No

El programa Título VI toma en cuenta métodos de investigación y análisis, estándares, y políticas para asegurar la equidad como una prioridad cuando se toman decisiones sobre el transporte público.

* 4. Sabías que TriMet lleva a cabo un análisis de equidad cuando se proponen cambios mayores al servicio (aumento y/o reducción al servicio)?

Sí No

* 5. Cuando hay propuestas de cambio al servicio, TriMet revisa como esto afectará a diferentes poblaciones, así como el acceso a lugares de empleo, escuelas, salud, y comida el cambio.

¿Hay alguna otra cosa que se debe tomar en cuenta?

Sí - Describe:

No

* 6. Ha experimentados algún cambio a una línea de tren o autobús en la cual viajas?

Sí No

* 7. El cambio resultó ser positivo o negativo?

Positivo - Por favor describa:

Negativo - Que podría haber hecho TriMet para disminuir el impacto (además de no cambiar nada)?

* 8. Sabías que TriMet lleva a cabo un análisis de equidad cuando se proponen cambios de tarifas (aumento o reducción) o métodos de pagos de las tarifas?

Sí No

Encuesta sobre programa de derechos civiles

El análisis de equidad a las tarifas incluye revisar los impactos que pueda tener el cambio propuesta a las tarifas en las poblaciones de bajos ingresos y personas de color.

- * 9. Que debe tomar en cuenta TriMet cuando está considerando aumentar o bajar el costo de las tarifas o un cambio al método de pago?

Los estándares de rendimiento garantizan que el servicio de tránsito sea seguro, confiable, receptivo, fácil y acogedor. Estas normas incluyen el diseño del servicio y las prácticas de operación, tales como la distribución de nuevos autobuses, el aumento de la frecuencia del servicio, la disponibilidad del servicio y la ubicación de ciertos servicio

10. ¿Antes de hoy, sabías TriMet estableció estándares y políticas de rendimiento para asegurar de que la equidad sea una prioridad cuando se dan las mejoras al servicio?

Sí No

- * 11. ¿Cómo calificarías los siguientes cambios al servicio? (con el uno siendo el más importante para ti y el seis el menos importante) importante?

- Fiabilidad (vehículos que llegan a tiempo)
- Capacidad (menos aglomeración en autobuses y trenes)
- Comodidad (paradas de autobús más cercanas a ti)
- Edad del vehículo (autobuses más nuevos)
- Servicio más frecuente (autobuses que llegan más a menudo)
- Servicios (paradas cubiertas, bancos, iluminación, pantallas digitales)

Para asegurar que nuestros pasajeros sean tratados de manera justa y con dignidad y respeto, TriMet debe tener un programa de gestión de quejas de Derechos Civiles que incluya procedimientos para presentar una queja.

12. Antes de hoy, ¿sabías que TriMet tiene procedimientos para atender las quejas por discriminación?

Sí No

- * 13. ¿Cuál es tu idioma principal?

- * 14. ¿Qué tan bien lees, hablas o entiendes inglés?

	Muy bien	Bien	No Muy Bien	No lo
Lees	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Hablas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Entiendes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Te agradecemos tu participación.

15.. Si deseas participar en otras encuestas de TriMet o recibir actualizaciones de nuestro plan, favor de proporcionar tu correo su correo electrónico.

Email:



TriMet Title VI Program Update Survey - Short

TriMet is committed to a public transportation system where all are welcome.

Your responses to the following questions will help us improve our Civil Rights/Title VI program and ensure safer, more inclusive, and accessible services for everyone.

OK

* 1. Before today, were you aware that TriMet has a Civil Rights/Title VI Program?

- Yes
- No

NEXT



Title VI Program Update

We're updating our Title VI Program, and we want your feedback.

TriMet is required by the Federal Transit Administration (FTA) to update its Title VI Program and submit it for review every three years. Title VI is part of the Civil Rights Act, and it ensures that people are not excluded from involvement in an organization or use of its services because of their race, color or national origin.

Major Service Change policy

Disparate Impact/Disproportionate Burden policies

Public Participation Plan

Language Access Plan

Feedback

<https://trimet.org/equity/title6update>

Title VI
Disparate Impact and
Disproportionate Burden Policies
For Fare Changes

Overview

- TriMet is required to evaluate whether fare changes will have a disproportionate impact on minority or low-income populations.
- TriMet is required to adopt a Fare Change Policy that establishes a threshold for changes that require closer analysis for impacts to vulnerable populations.
- TriMet is required to prepare and submit fare equity analyses to the FTA and TriMet Board of Directors.

Existing Policy

Disparate Impact Policy:

For fare changes, a potential disparate impact is noted when the percentage of trips by minority riders using a fare option, in combination with the percentage price change for that option, has an impact that exceeds the comparable impact on non-minority riders.

Differences in the use of fare options between minority populations and non-minority populations include all such differences that are documented as statistically significant at the 95 percent confidence level.

Existing Policy

Disproportionate Burden Policy:

For fare changes, a potential disproportionate burden is noted when the percentage of trips by low-income riders using a fare option, in combination with the percentage price change for that option, has an impact that exceeds the comparable impact on higher income riders.

Differences in the use of fare options between low-income populations and higher income populations include all such differences that are documented as statistically significant at the 95 percent confidence level.

Proposed Updates

(red indicates proposed changes from existing policies)

For fare changes, a potential disparate impact is noted when the percentage of trips by minority riders using a fare option, in combination with the percentage price change for that option, has an impact that exceeds the comparable impact on non-minority riders. **The measure of disparate impact involves a comparison of impacts borne by minority populations compared to impacts borne by non-minority populations. When minority populations or riders will experience a 10% (or more) greater adverse effect than that borne by the non-minority populations or riders, such changes will be considered to have a disparate impact. The threshold of 10% will be used to determine if minority populations are more negatively affected or less positively affected by the proposed change.**

Differences in the use of fare options between minority populations and non-minority populations include all such differences that are documented as statistically significant at the 95 percent confidence level.

Where potential adverse impacts are identified, TriMet will provide a meaningful opportunity for public comment on any proposed mitigation measures, including any less discriminatory alternatives that may be available. For any proposed fare change, TriMet will work to minimize any potential impacts on minority populations. Upon finding a potential adverse impact from a proposed fare change, the TriMet may take steps to avoid, minimize, or mitigate these impacts, where practicable.

Proposed Updates

(red indicates proposed changes from existing policies)

For fare changes, a potential disparate impact is noted when the percentage of trips by low-income riders using a fare option, in combination with the percentage price change for that option, has an impact that exceeds the comparable impact on higher income riders. **The measure of disparate impact involves a comparison of impacts borne by low-income populations compared to impacts borne by higher income populations. When low-income populations or riders will experience a 10% (or more) greater adverse effect than that borne by the higher income populations or riders, such changes will be considered to have a disparate impact. The threshold of 10% will be used to determine if low-income populations are more negatively affected or less positively affected by the proposed change.**

Differences in the use of fare options between low-income populations and higher income populations include all such differences that are documented as statistically significant at the 95 percent confidence level.

Where potential adverse impacts are identified, TriMet will provide a meaningful opportunity for public comment on any proposed mitigation measures, including any less discriminatory alternatives that may be available. For any proposed fare change, TriMet will work to minimize any potential impacts on low-income populations. Upon finding a potential adverse impact from a proposed fare change, the TriMet may take steps to avoid, minimize, or mitigate these impacts, where practicable.

Implications

For all fare changes, staff must conduct public outreach and a equity analysis of impacts to vulnerable populations, and report its findings to the TriMet Board of Directors and Federal Transit Administration.

Prior to taking action or implementation, the TriMet Board must be made aware, consider, and approve of the analysis.

Feedback Needed

Please provide feedback on whether the proposed policies achieve the stated objective of evaluating the impacts of proposed fare changes on minority and low-income populations.

Title VI

Major Service Change Policy

Overview

- TriMet is required to evaluate whether changes to its service have a disproportionate impact on minority or low-income populations.
- Minor changes to service are not subject to close scrutiny. Exception of cumulative effect.
- TriMet is required to adopt a Major Service Change Policy to establish a threshold for changes that require closer analysis for impacts to vulnerable populations.

Existing Policy

1. A change to 15% or more of a line's route miles. This includes routing changes where route miles are neither increased nor reduced (i.e. re-routes), or;
2. A change of 15% or more to a line's span (hours) of service on a daily basis for the day of the week for which a change is made, or;
3. A change of 15% or more to a line's frequency of service on a daily basis for the day of the week for which a change is made, or;
4. A single transit route is split into two or more transit routes.
5. A new transit route is established

Proposed Update

6. A transit route is eliminated or retired from service.

Implications

For all Major Service Changes, staff must conduct public outreach and a equity analysis of impacts to vulnerable populations, and report its findings to the TriMet Board of Directors and Federal Transit Administration.

Prior to taking action or implementation, the TriMet Board must be made aware, consider, and approve of the analysis.

Why the update?

Although TriMet's Major Service Change policy is one of the most sensitive across transit agencies, this change will make the way TriMet handles major service changes an industry standard. It will also help to make the designation easier for riders and the public to understand.

FEEDBACK

We want to know what you think about the changes we are proposing. Leave your comments below or email greenc@trimet.org.

Major Service Change policies

Disparate Impact/Disproportionate Burden policies

Public Participation Plan

Language Access Plan

Submit Feedback