



Title VI Service Equity Analysis: FY2024 Annual Service Plan

March 7, 2023

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I. Executive Summary

TriMet is proposing to implement several service changes in fall 2023 through spring 2024. In accordance with Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B, TriMet conducts a Service Equity Analysis to ensure that minority and low-income populations are not unfairly impacted any time Major Service Changes are proposed. The FY2024 Annual Service Plan includes Major Service Changes to 19 bus lines, which require an analysis prior to action by the TriMet Board of Directors.

A. Methodology

TriMet's Title VI Program outlines the agency's Major Service Change, Disparate Impact, and Disproportionate Burden policies and Equity Analyses. TriMet analyzes Major Service Changes for potential adverse effects and distribution of benefits based on race/ethnicity or income at the individual line-level and system-level.

B. Major Service Changes

The proposed changes to 19 lines meet TriMet's thresholds for Major Service Changes:

- Line 19-Woodstock/Glisan
- Line 35-Macadam/Greeley
- Line 36-South Shore
- Line 39-Arnold Creek/Hillsdale
- Line 43-Taylor's Ferry Rd/Marquam Hill
- Line 48-Cornell
- Line 51-Vista/Sunset Blvd
- Line 52-Farmington/185th
- Line 54-Beaverton-Hillsdale Hwy
- Line 55-Hamilton
- Line 56-Scholls Ferry Rd/Marquam Hill
- Line 61-Marquam Hill/Beaverton
- Line 64-Marquam Hill/Tigard
- Line 65-Marquam Hill/Barbur Blvd
- Line 66-Marquam Hill/Hollywood
- Line 68-Marquam Hill/Collins Circle
- Line 77-Broadway/Halsey
- Line 87-Airport Way/181st
- Line 94-Tigard/Sherwood

C. Findings

1. There are **potential line level disparate impacts** for 6 Major Service Improvements
2. There are **potential line level disproportionate burdens** for 1 Major Service Improvement and 2 Major Service Reductions

3. There are **no system-level disparate impacts or disproportionate burdens** for the Major Service Improvements or Major Service Reductions
4. A **greater share of the region’s minority and low-income populations stand to benefit** from the Major Service Improvements compared to non-minority and higher income populations.
5. A **smaller share of the region’s minority and low-income populations stand to be impacted** by the Major Service Reductions compared to non-minority and higher-income populations

II. Background

TriMet’s Annual Service Plan for FY2024 (July 1, 2023 – June 30, 2024) proposes major service changes to 19 bus lines to begin implementing the Forward Together Service Concept focused on ridership and improving connections to destinations for people with low and limited incomes. Other changes proposed for FY2024 do not meet the Major Service Change threshold to be reviewed in this analysis.

This report documents the equity analysis conducted for the major service changes.

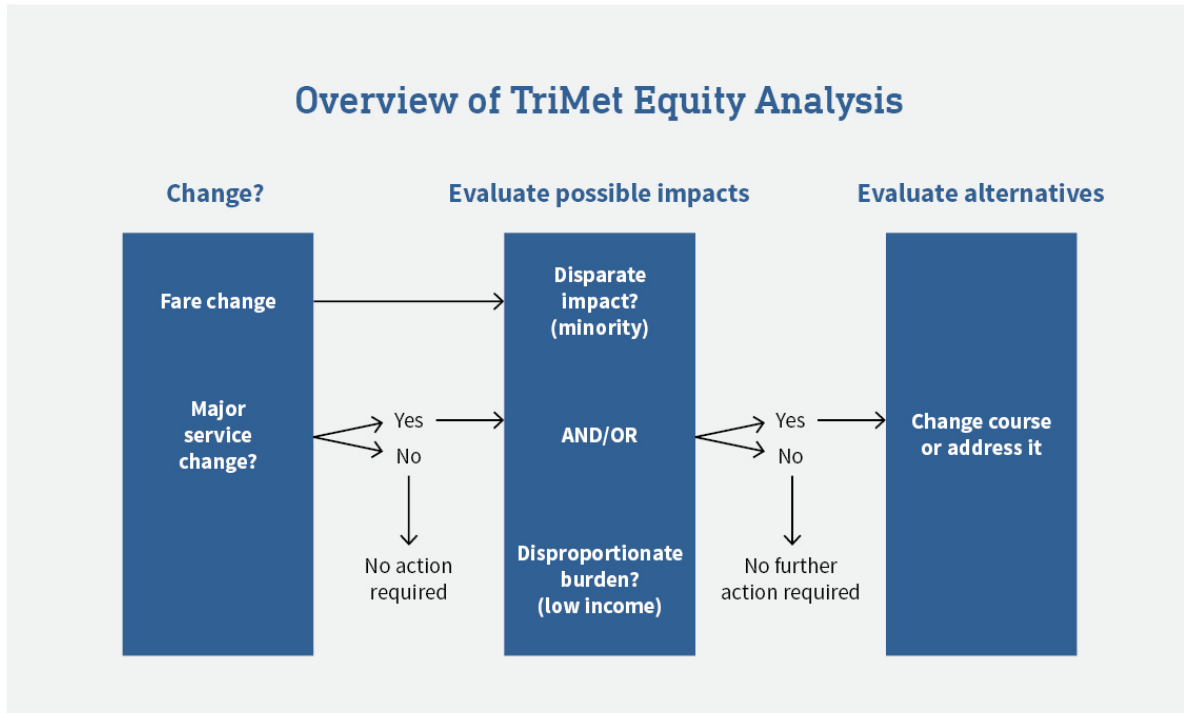
III. TriMet Title VI Compliance

As a recipient of Federal Transit Administration (“FTA”) financial assistance, TriMet must ensure that service changes – both improvements 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 and minority populations by conducting a service equity analysis. Figure 1 shows the general sequence of steps and considerations in the equity analysis process.

Figure 1: Overview of TriMet's Title VI Equity Analysis process



TriMet’s Title VI Program 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, outlined below.

A. Major Service Change Policy

Any service change that meets the Major Service Change threshold is subject to a Title VI Equity Analysis prior to Board approval. The completed Title VI Equity Analysis must be presented to the Board for consideration and included in the subsequent TriMet Title VI Program with a record of action taken by the Board.

A **Major Service Change** is:

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** of service on a daily basis for the day of the week for which a change is made, as measured by revenue hours, 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, as measured by revenue hours, or;

4. A single transit line is **split** into two or more transit lines,
5. A transit line is retired or eliminated from service, or;
6. 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 (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 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., 35 percent compared to 32 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., 29 percent compared to 32 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.

IV. Proposed Service Changes

A. Description of Changes

Table 1 lists the proposed changes by the type of service change:

Table 1: Proposed Service Changes in FY2024 Annual Service Plan

Line	Service Change Description
Line 51-Vista/Sunset Blvd	➤ Increase route length
Line 94-Tigard/Sherwood	➤ Decrease route length
Line 19-Woodstock/Glisan Line 35-Macadam/Greeley Line 43-Taylor's Ferry Rd/Marquam Hill Line 48-Cornell Line 52-Farmington/185 th Line 54-Beaverton-Hillsdale Hwy Line 56-Scholls Ferry Rd/Marquam Hill Line 77-Broadway/Halsey Line 87-Airport Way/181 st	➤ Increase frequency and span
Line 39-Arnold Creek/Hillsdale	➤ Reduce frequency and span
Line 36-South Shore Line 55-Hamilton Line 61-Marquam Hill/Beaverton Line 64-Marquam Hill/Tigard Line 65-Marquam Hill/Barbur Blvd Line 66-Marquam Hill/Hollywood Line 68-Marquam Hill/Collins Circle	➤ Eliminate line

Note: The FY2024 Annual Service Plan also included minor changes to several bus lines (44, 62, 99) that are not included in this analysis because they do not meet 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 route length and/or revenue hours are compared. Changes of 15% or more qualify as Major Service Changes, including changes meeting this threshold cumulatively over three years.

Results of the comparison are shown in Table 2:

Table 2: Results of Major Service Change Test By Line

Line	Route Length Change	Frequency/Span Change	Line Split	Eliminate Line	New Line or Service
Line 19		+15%			
Line 35		+15%			
Line 36				X	
Line 39		-15%			
Line 43		+15%			
Line 48		+15%			
Line 51	+15%				
Line 52		+15%			
Line 54		+15%			
Line 55				X	
Line 56		+15%			
Line 61				X	
Line 64				X	
Line 65				X	
Line 66				X	
Line 68				X	
Line 77		+15%			
Line 87		+15%			
Line 94	-15%				

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 improvements are analyzed. For service improvements, 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 within ¼ mile buffers of bus stops on 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 Improvements
3. Other Major Service Changes

1. Major Service Reduction

For service reductions, the analysis examines whether *adverse effects* 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 FY2024 Annual Service Plan includes **nine Major Service Reductions** and the results of the line-level potential Disparate Impact and Disproportionate Burden analyses shown in Tables 3 & 4:

Table 3: Potential Line-Level Major Service Reduction Disparate Impact Analysis

<p>A Major Service Reduction 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., 35 percent compared to 32 percent).</p> <p style="text-align: center;">Percent minority population for entire TriMet District: 32.0%</p>				
Line	Total Line Population	Minority Population	Percent Minority Population	Single Line Disparate Impact (>=35.0%)
36	36,919	9,819	26.6%	NO
39	15,401	3,410	22.1%	NO
55	28,281	6,942	24.5%	NO
61	8,417	2,144	25.5%	NO
64	11,255	3,080	27.4%	NO

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65	9,192	1,798	19.6%	NO
66	21,866	4,888	22.4%	NO
68	17,164	5,390	31.4%	NO
94	17,477	4,779	27.3%	NO

Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Table: 2017-2021 (5-Year Estimates) Table B03002-Hispanic or Latino Origin By Race <https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=40>

Table 4: Potential Line-Level Major Service Reduction Disproportionate Burden Analysis

A Major Service Reduction 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., 19.8 percent compared to 16.8 percent).

Percent population earning below 150% federal poverty level for the entire TriMet service district: 16.8%

Line	Total Line Population	Population Below 150% FPL	Percent Population Below 150% FPL	Single Line Disproportionate Burdens (>=19.8%)
36	34,219	6,386	18.7%	NO
39	15,089	1,686	11.2%	NO
55	27,187	6,211	22.8%	YES
61	8,333	1,372	16.5%	NO
64	11,197	1,593	14.2%	NO
65	9,124	1,120	12.3%	NO
66	21,657	3,409	15.7%	NO
68	15,056	4,824	32.0%	YES
94	17,298	3,139	18.1%	NO

Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey 2017-2021 5Y Estimates Table: Table C17002-Ratio Of Income To Poverty Level In The Past 12 Months (Block Group Level Data) <https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=42>

➤ **Lines 55, 68 (Eliminate)**

These changes would eliminate service for populations that are above the Disproportionate Burden threshold (16.8%) for Major Service Reductions. This indicates **potential Disproportionate Burdens**, calling for further examination in the system-level analysis section

2. Major Service Improvements

For service improvements, the analysis examines whether *benefits* are inclusive of minority and low-income populations. If *benefits* are identified and a line’s minority and/or low-income populations are at least 3 percentage points less 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 FY2024 Annual Service Plan includes **10 Major Service Improvements** and the results of the line-level potential Disparate Impact and Disproportionate Burden analyses shown in Tables 5 & 6:

Table 5: Potential Line-Level Major Service Improvement Disparate Impact Analysis

A Major Service Improvement to a single line will be considered to have a potential Disparate Impact if the percentage of impacted minority population in the service area are at least 3 percentage points less than the minority populations for the TriMet District as a whole (e.g., 29 percent compared to 32 percent).

Percent minority population for entire TriMet District: 32.0%

Line	Total Line Population	Minority Population	Percent Minority Population	Single Line Disparate Impact (<=29.0%)
19	63,327	17,456	27.6%	YES
35	58,502	15,613	26.7%	YES
43	25,436	5,933	23.3%	YES
48	30,902	13,283	43.0%	NO
51	20,145	4,527	22.5%	YES
52	33,236	15,733	47.3%	NO
54	32,848	9,370	28.5%	YES
56	20,287	4,965	24.5%	YES
77	69,840	21,650	31.0%	NO
87	22,269	10,888	48.9%	NO

Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Table: 2017-2021 (5-Year Estimates) Table B03002-Hispanic or Latino Origin By Race <https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=40>

➤ **Lines 19, 35, 43, 54, 56** (Increase frequency and span)

These changes would increase service for populations that are below the Disparate Impact threshold (29%) for Major Service Improvements. This indicates **potential Disparate Impacts**, calling for further examination in the system-level analysis section

➤ **Line 51** (Increase route length)

This change would increase service for a population that is below the Disparate Impact threshold (29%) for Major Service Improvements. This indicates a **potential Disparate Impact**, calling for further examination in the system-level analysis section

Table 6: Potential Line-Level Major Service Improvement Disproportionate Burden Analysis

A Major Service Improvement 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 are at least 3 percentage points less than the low-income populations for the TriMet District as a whole (e.g., 13.8 percent compared to 16.8 percent).

Percent population earning below 150% federal poverty level for the entire TriMet service district: 16.8%

Line	Total Population	Population Below 150% FPL	Percent 150% Below FPL Population	Single Line Disproportionate Burdens (<=13.8%)
19	60,023	13,053	21.7%	NO
35	54,967	10,830	19.7%	NO
43	25,287	3,316	13.1%	YES
48	30,570	5,203	17.0%	NO
51	20,118	3,797	18.9%	NO
52	33,033	6,767	20.5%	NO
54	30,333	7,350	24.2%	NO
56	19,993	2,990	15.0%	NO
77	69,074	15,388	22.3%	NO
87	21,923	7,811	35.6%	NO

Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey 2017-2021 5-Year Estimates Table: Table C17002-Ratio Of Income To Poverty Level In The Past 12 Months (Block Group Level Data)
<https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=42>

➤ **Line 43** (Increase frequency and span)

This change would increase service for a population that is below the Disproportionate Burden threshold (13.8%) for Major Service Improvements. This indicates a **potential Disparate Impact**, calling for further examination in the system-level analysis section

3. Other Major Service Changes

There are no Other Major Service Changes.

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 Improvements**

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 7 compares the impacted minority and non-minority populations:

Table 7: System-Level Major Service Improvements Disparate Impact Analysis

Population Category	District-Wide Population	FY2024 Service Improvement Impacted Population	Percent Impacted Population	System-wide Disparate Impact (Minority Pop Percentage <= 14.9%)
Minority	528,988	99,981	18.9%	NO
Non-Minority	1,121,634	209,084	18.6%	
Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Table: 2017-2021 (5-Year Estimates) Table B03002-Hispanic or Latino Origin By Race https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=40				

A higher percentage of the District’s minority population (18.9%) stands to benefit from the proposed Major Service Improvements, compared to the non-minority population (18.6%). Therefore, a **system-level Disparate Impact is not found for the proposed Major Service Improvements.**

➤ **System-level Disproportionate Burden Analysis: Major Service Improvements**

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 8 compares the impacted low-income and higher income populations:

Table 8: System-Level Major Service Improvements Disproportionate Burden Analysis

Population Category	District-Wide Population	FY2024 Service Improvement Impacted Population	Percent Impacted Population	System-Wide Disproportionate Burden (Low-Income Pop Percentage <=14.3%)
Below 150% of FPL	273,937	59,972	21.9%	NO
Above 150% of FPL	1,355,683	242,724	17.9%	
Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey 2017-2021 5-Year Estimates Table: Table C17002-Ratio Of Income To Poverty Level In The Past 12 Months (Block Group Level Data) https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=43				

A higher percentage of the District’s low-income population stands to benefit from the proposed Major Service Improvements (21.9%) compared to the higher income population (17.9%). Therefore, a ***system-level Disproportionate Burden is not found for the proposed Major Service Improvements.***

➤ ***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 9 compares the impacted minority and non-minority populations:

Table 9: System-Level Disparate Impact Analysis

Population Category	District-Wide Population	FY2024 Service Reduction Impacted Population	Percent Impacted Population	System-wide Disparate Impact (Minority Pop Percentage >= 9.1%)
Minority	528,988	28,938	5.5%	NO
Non-Minority	1,121,634	85,357	7.6%	
Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Table: 2017-2021 (5-Year Estimates) Table B03002-Hispanic or Latino Origin By Race https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=40				

A lower percentage of the District’s minority population (5.5%) is negatively impacted by the proposed Major Service Reductions, compared to the non-minority population (7.6%). Therefore, a ***system-level Disparate Impact is not found for the proposed Major Service Reductions.***

➤ ***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 10 compares the impacted low-income and higher income populations:

Table 10: System-Level Disproportionate Burden Analysis

Population Category	District-Wide Population	FY2024 Service Reduction Impacted Population	Percent Impacted Population	System-Wide Disproportionate Burden (Low-Income Pop Percentage >=9.2%)
Below 150% of FPL	273,937	18,840	6.9%	NO
Above 150% of FPL	1,355,683	91,915	6.8%	
Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Table: Table C17002-Ratio Of Income To Poverty Level In The Past 12 Months (Block Group Level Data) https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=43				

A higher percentage of the District’s low-income population stands to be negatively impacted by the proposed Major Service Reductions (6.9%) compared to the higher income population (6.8%). However, this does not exceed the low-income population disproportionate burden threshold (9.2%). Therefore, a ***system-level Disproportionate Burden is not found for the proposed Major Service Reductions.***

V. Community Engagement

TriMet staff conducted two rounds of public outreach, which resulted in over 5,000 comments being submitted.

The first outreach process occurred in September – October 2022 and requested public comment on all the service changes in the Forward Together Service Concept. Staff made information available on trimet.org/forward, included a survey in eight languages via an online language translation tool, advertised to the community through social media (Facebook and Twitter) and handouts translated into eight languages (English, Spanish, Korean, Vietnamese, Chinese, Ukrainian, Russian, and Somali). The survey was also advertised to TriMet’s Riders Club via email, to customers at transit centers via e-readers at the stops with QR codes, and employees via ExpressLine, the online employee newsletter. The survey received 4,597 responses, of which 124 were completed in a language other than English. In addition to the online outreach, TriMet staff conducted six in-person open house meetings and one virtual open house meeting. All of the open houses featured some non-English language translation depending on where they were located.

The second outreach process occurred in January – February 2023 and requested comment on the specific service changes in the Forward Together Service Concepts proposed to be implemented in the FY2024 Annual Service Plan. Staff made information available on trimet.org/plan and through eleven in-person open house meetings and six virtual events. All in-person events featured some non-English language translation depending on location. The proposed changes and open houses were also advertised on KATU, KGW, KOIN, Fox News, and in newspapers such as the Oregonian, Willamette Week, and the Statesman Journal. TriMet also promoted the service changes on social media (Facebook and Twitter). Visitors to the webpage submitted 1,115 comments.

The following is a summary of themes across the feedback received:

- Service Upgrades – Riders supported increased frequency and span on both the proposed Frequent Service Routes and on routes, which had service cut in response to COVID-19 and the operator shortage

- Route Changes – Riders shared support and concern about route changes on multiple routes that impact travel time and ability to access destinations
- Access to businesses – Riders requested early morning and late evening span to reach job sites at the beginning and end of shifts
- Elimination – Some riders expressed concern about elimination of low-ridership and express routes, while others acknowledged decreased demand following COVID-19 travel changes

VI. Summary of Findings

Table 11 summarizes the results of the line-level and system-level Disparate Impact and Disproportionate Burden analyses:

Table 11: Summary of Disparate Impact and Disproportionate Burden Analysis Results

		Potential Disparate Impact?	Potential Disproportionate Burden?
Major Service Reductions	Line 36-South Shore	No	No
	Line 39-Arnold Creek/Hillsdale	No	No
	Line 55-Hamilton	No	Yes
	Line 61-Marquam Hill/Beaverton	No	No
	Line 64-Marquam Hill/Tigard	No	No
	Line 65-Marquam Hill/Barbur Blvd	No	No
	Line 66-Marquam Hill/Hollywood	No	No
	Line 68-Marquam Hill/Collins Circle	No	Yes
	Line 94-Tigard/Sherwood	No	No
	Combined Reductions (System-level)	No	No
Major Service Improvements	Line 19-Woodstock/Glisan	Yes	No
	Line 35-Macadam/Greeley	Yes	No
	Line 43-Taylor's Ferry Rd/Marquam Hill	Yes	Yes
	Line 48-Cornell	No	No
	Line 51-Vista/Sunset Blvd	Yes	No
	Line 52-Farmington/185 th	No	No

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Line 54-Beaverton-Hillsdale Hwy	Yes	No
Line 56-Scholls Ferry Rd/Marquam Hill	Yes	No
Line 77-Broadway/Halsey	No	No
Line 87-Airport Way/181 st	No	No
Combined Improvements (System-level)	No	No
Other Major Service Changes	-	-

While potential disparate impacts and disproportionate burdens were identified for Major Service Improvements on Lines 19, 35, 43, 51, 54, & 56, TriMet staff recommend improving service on these routes to improve access to major job destinations, schools, and address service reductions implemented due to COVID-19 and operator shortage. And while potential disproportionate burdens were identified for Major Service Reductions on Lines 55 and 68, staff recommend eliminating service on these routes due to low ridership and availability of nearby service.

Since no system-level disparate impact or disproportionate burden were found for the Major Service Reductions and Major Service Improvements, a greater share of minority and low-income populations stand to benefit from the improvements than non-minority and higher income populations and minority and low-income populations will not be impacted substantially more by the reductions than non-minority or higher income populations.