

# 2022 Title VI Program Update

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



**Dear Reader,**

Every three years TriMet is required to review and update our Title VI Program, however our commitment to and focus on civil rights, equity and social justice is an integral part of our daily operations. Fair treatment, equal access, and personal dignity drives our decision making and directs how TriMet provides transportation services to the citizens of the Metro Portland Area.

The historic Civil Rights Act of 1964 created a mandate that public accommodations and services, like public transit, be provided in a manner that does not discriminate against people based upon race, color, national origin, English proficiency, or economic status. TriMet eagerly fulfills the mandate of the Civil Rights Act by having robust compliance with Title VI of the Act and we engage in proactive measures that value equity in the services we provide.

Since being appointed TriMet General Manager in June 2021, I have continued our investments in civil rights by establishing a new Inclusion, Diversity, Equity and Accessibility Office, elevating the oversight and management of this work to an executive level position. This new office will deepen our commitment to the advancement of equity, and continuously monitor compliance with Title VI, moving our work forward with an equity and social justice lens.

During our review of our Title VI program, I thought of civil rights leader Julian Bond who said, "The humanity of all Americans is diminished when any group is denied rights granted to others." We remain passionately committed to carrying this work forward, ensuring that everyone in our community can fairly access and utilize our transit system.

Sam Desue Jr.  
TriMet General Manager



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# Introduction

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## WHAT IS TITLE VI?

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, or national origin in programs and activities of any entity that receive federal assistance.

The **Civil Rights Act of 1964** is a landmark civil rights and labor law in the United States that outlaws discrimination based on race, color, religion, sex,<sup>[a]</sup> and national origin.<sup>[4]</sup> It prohibits unequal application of voter registration requirements, racial segregation in schools and public accommodations, and employment discrimination. The act stands as one of the most significant legislative achievements in American history. The Civil Rights Act of 1964, included eleven “Titles” outlawing several types of race-based discrimination. One of these “Titles” – Title VI – included the following provision:

The United States has a long history of unjust and unequal 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, ethnicity, and class– 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:

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*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.*

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**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 program<sup>1</sup>, 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.

## 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.

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### **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.*

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The General Manager has overall responsibility for carrying out the TriMet’s commitment to the Title VI program. TriMet’s Chief, Inclusion, Diversity, Equity and Accessibility Officer and the Civil Rights and Equity Programs Manager are primarily 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.

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<sup>1</sup> 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.

## 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 (TEAC) and our Committee on Accessible Transportation (CAT) 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 recover from the Global Pandemic and begin 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 C4702.1B. 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.

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# Part I: General Requirements

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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 website<sup>2</sup>, in all vehicles (bus and rail), and in the administrative offices. TriMet's Title VI complaint form<sup>3</sup> and procedures<sup>4</sup> 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."

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

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

<sup>4</sup> <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](mailto:hello@trimet.org).

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### ***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."*

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### **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](mailto:hello@trimet.org)

#### **Web Based Complaint**

Title VI Complaints can also be filed online by visiting the link to the web page below:

<https://trimet.org/about/titlevi-complaint.htm>

You may also 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

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*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.”*

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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

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### *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.”*

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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) public accommodations investigation during the reporting period alleging disability discrimination. It was investigated by BOLI and was dismissed for lack of sufficient evidence to continue investigation on May 19, 2022.

### **Lawsuits**

A complaint was filed in State Court on September 30, 2019, alleging that a bus operator did not allow complainant to bring his bag of cans onto the bus due to racial animus. TriMet settled the claim via \$100 loaded onto a HOP Fastpass fare card.

A pro se complaint was filed in state court on February 13, 2020, that alleged discrimination and a violation of his state constitutional rights based on TriMet’s fare inspection procedures and practices. TriMet moved to dismiss, which the Court granted on April 13, 2021 and a judgment was entered on June 9, 2021.

Pro se plaintiff alleged discrimination on the basis of disability and religion related to TriMet’s mask requirements. He filed the complaint on or about April 30, 2021, in Multnomah County Circuit Court. He also filed a complaint with BOLI about the same set of facts, which was dismissed due to the pending lawsuit. Plaintiff voluntarily dismissed his complaint on or about March 15, 2022, and a general judgment was entered on June 24, 2022.

On or about January 28, 2021, Complainant filed a complaint pro se against TriMet and 43 others alleging civil rights violations and disability discrimination involving various encounters with TriMet

employees and passengers between 2015 and 2018 (as well as other allegations involving law enforcement). TriMet moved to dismiss and, after plaintiff did not file amended claims at the Court's request, the Court dismissed the case. A judgment of dismissal was entered on March 3, 2022.

On March 15, 2021, plaintiff pro se filed a complaint in federal court alleging that his rights were violated when the bus operator did not stop for him. Though not totally clear, the complaint suggests that the failure to stop for him was based on the plaintiff's race. TriMet moved to dismiss, and the motion was granted. The Court entered a judgment of dismissal on November 17, 2021.

## 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	Actions Taken /Findings
11/9/2019	Complaint filed with TriMet related to asking Customer to remove modesty mask	Closed	Inconclusive
5/8/2020	Complaint filed with TriMet related to Bus leaving stop and opening doors for passenger	Closed	Inconclusive
12/17/2020	Complaint filed with TriMet alleging improper customer service by operator	Closed	Inconclusive
3/3/2021	Complaint filed with TriMet because the 79 bus does not adhere to schedule causing rider to have to use alternative transportation means	Closed	Cleared
3/12/2021	Complaint alleging a title VI violation related to an ongoing issue with an operator related to an event that occurred in November of 2020	Closed	Inconclusive
4/14/2021	Complaint filed with TriMet related to Fare Inspection on Max	Closed	Inconclusive

Date Filed	Summary	Status	Actions Taken /Findings
12/7/2021	Complaint filed with TriMet related to an allegation that a driver did not print out a partial ticket/transfer due to the rider's race.	Closed	Inconclusive
7/22/2021	Complaint filed with TriMet related to Fare Dispute, rider using ineligible Fare	Closed	Cleared
1/5/2022	Complaint filed with TriMet alleging Operator intentionally passed Stop and did not let rider de-board at requested location	Closed	Cleared
2/21/2022	Complaint filed with TriMet related to Rider being asked to de-board near rear bus exit	Closed	Cleared
2/27/2022	Complaint filed with TriMet related to rider argument with operator on customer service	Closed	Inconclusive
5/18/2022	Complaint filed with TriMet related to customer service issue for information regarding Max Train stoppage and explanation from Max Operator	Closed	Cleared
5/29/2022	Complaint filed with TriMet related to a rider appearing to be experiencing a behavioral health issue and arguing with Bus operator	Closed	Incomplete
5/29/2022	Customer service issue related to Bus stopping short of Bus Stop in order to avoid construction.	Closed	Inconclusive
6/1/2022	Customer Service Complaint alleging inconsistent treatment of riders	Closed	Incomplete
6/30/2022	Customer Service Complaint related to rider crossing yellow line near front entrance of bus before doors opened and Bus Stopped	Closed	Cleared
8/8/2022	Complaint filed with TriMet related to Operator leaving the stop before passenger could find their seats	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 Public Affairs Division and Office of Inclusion, Diversity, Equity and Accessibility serve as resources as a resource to other TriMet divisions to integrate these populations into TriMet's public involvement activities.

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### *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.”*

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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 2019 to June 2022. During this period, TriMet conducted outreach for:

- Service Enhancement Plans/Forward Together
- Public Transportation Improvement Plan (i.e., TriMet’s STIF Plan)
- Bus service expansion
- Construction Projects
- Southwest Corridor Light Rail Project
- Redistricting Board Districts
- General Manager hiring
- Reimagining Public Safety
- 2022 Community Survey

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### 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.
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### TEAC & Reimagine Public Safety - Participating Organizations



## Public Participation Continued: Forward Together

Changes to the transit market resulting from the COVID-19 pandemic, such as greater work from home rates, lower peak commuter ridership, and increased demand to areas with essential workers are likely to remain to some degree. Consequently, TriMet is conducting a comprehensive service analysis called Forward Together, which will assess how the market for transit service has changed and reallocate service to new and growing ridership opportunities. The plan, which will supersede the Service Enhancement Plans, also make recommendation for where to direct future service expansions. Specifically, we're exploring:

- where buses serve now and where they should serve in the post-pandemic future,
- whether riders traveling more between suburbs rather than in and out of Downtown Portland, and
- if more buses should operate where people ride the most or spread across the region to serve more neighborhoods, regardless of ridership potential.

TriMet will complete Forward Together-Phase I in Fall of 2022. Phase I will provide recommendations of where to reallocate existing transit service and where to direct future service expansions with projected STIF funding over the next several years. Forward Together-Phase II will make recommendations for important service expansions and improvements should new funding be identified.

TriMet staff will conduct outreach to Title VI and LEP communities via email, social media, open and meetings in partnership with community based organizations.

## Public Transportation Improvement Plan

In 2017, the Oregon Legislature passed HB 2017, The Keep Oregon Moving Act. The legislation included a 1/10<sup>th</sup> of 1 percent statewide payroll tax on employees for transit. This tax pays for the Statewide Transportation Improvement Fund, which is dedicated to funding various transit programs. Programs include fare mitigation, transit service expansion to low-income communities, expansion of electric buses, reduction of the fragmentation of services, transit programs for students in grades 9-12, and transit programs for seniors and people with disabilities. The legislation requires the recipient of the funds to work with an advisory committee to submit a plan for how the funds will be spent every two-years. Among the members of the HB 2017 Transit Advisory Committee, 57% identify as female, 43% identify as people of color, and one person identifies as a person with a disability. Many committee members represent people who earn low-incomes.

While the legislation also requires many of the programs to be directed towards low-income communities, it leaves it up to each advisory committee to determine what is low-income. The HB 2017 Transit Advisory Committee chose to rely on TriMet's Equity Index which considers 10 factors including income (200% of poverty), people of color, age – both seniors and youth separately, people with disabilities, limited English proficiency, limited vehicle access, low and medium wage jobs, affordable housing units, and key retail/human/social services. The top quartile of census block groups with the highest index scores are where many of the STIF programs are focused.

While developing the STIF Plan, TriMet staff conducted worked with community based organizations to hold a series of workshops to determine the community's priorities for how to spend the funds. Among the programs, the community prioritized increasing transit service (e.g., new routes, increased frequency, earlier/later service), a low-income fare program, and a transition to electric buses. As a result, much of the STIF funding that TriMet receives is directed to these programs. Other funds go to a high school pass program, transit programs for seniors and people with disabilities, a high school pass program, and capital projects.

### Bus Service Expansion

HB2017 provided a new statewide transportation funding package allowing for continued expansion of transit service and amenities. During the outreach process, TriMet utilized its multicultural contract with community organizations to reach out to Limited English Proficiency communities. Public outreach was conducted during our Annual Service Change process that includes multiple public meetings in multiple languages. The service expansion included:

New/extended routes or other route changes

- New Line 31-Webster Rd. in Clackamas County
- Streamlined Line 79-Clackamas/Oregon City on 82<sup>nd</sup> Dr. in Clackamas County
- Extension of Line 32-Oatfield to Oregon City High School
- Break Line 4-Fessenden/Division line into two lines to improve on-time performance
- Extend 24-Fremont across the Fremont Bridge to NW 18<sup>th</sup>/19<sup>th</sup> to Goose Hollow

More buses at more times

- 16-Front Ave: additional frequency during weekday peak travel and adding Sunday service
- 20-Burnside/Stark: upgrade to Frequent Service
- 30-Estacada: add Sunday service
- 32-Oatfield Rd.: add Sunday service
- 61-Marquam Hill/Beaverton: earlier/later service
- 64-Marquam Hill/Tigard: earlier/later service
- 66-Marquam Hill/Hollywood TC: earlier/later service
- 68-Marquam Hill/Collins Cir.: earlier/later service
- 73-122<sup>nd</sup> Ave: upgrade to Frequent Service
- 74-162<sup>nd</sup> Ave: increase frequency
- 76-Hall/Greenburg: upgrade to Frequent Service
- 78-Denney/Kerr Pkwy.: earlier/later/weekend service
- 81-Kane/257<sup>th</sup>: increase frequency and operate later/earlier trips
- 87-Airport Way/181<sup>ST</sup>: increased weekday span of hours to later in the evening
- 96-Tualatin/I-5: add midday service
- 155-Sunnyside: increased weekday peak frequency

Speeding up trips

- PBOT Rose Lane project partnership helped improve bus efficiency
- 15-Belmont/NW 23rd eastbound leg in downtown Portland moved to SW Alder to take advantage of the new Rose Lane leading to Morrison Bridge
- 2-Division and 10-Harold St route changes allow for launch of FX high capacity transit with 12 minute frequency

### Construction Projects

In 2015, TriMet began a rail repair and expansion process that addresses FTA required replacement of major sections and operating systems on MAX light rail. The Bus & Rail Reliability Strategic Team (BRRST) was created to plan for service disruptions and rail repair with a 6 to 9 month planning window prior to service disruptions.

Extensive outreach is required to prepare riders, neighbors and businesses for service disruptions, noise, and traffic control. Here are the projects completed from July 2019 through June 2022. TriMet uses a language plan to determine the top languages spoken around each construction area and around the shuttle bus detour area and mailers are sent in those languages explain the project. The most common languages used in mailers for these projects were English, Spanish, Vietnamese, Chinese, Russian, and Ukrainian, Additional mailing are sent if a noise variance or traffic control will impact neighbors.

**TABLE I-3: BRRST CONSTRUCTION PROJECTS**

DATE	LOCATION	
<b>Aug 4-19, 2019</b>	Lloyd District	Rail repair and switch replacement
<b>Sept 22 – Oct 5, 2019</b>	Gresham	Rail repair and operator break room construction
<b>Aug 2-29, 2020</b>	Downtown Portland	Steel Bridge rail and structure repair
<b>Oct 11-17, 2020</b>	Gresham	Rail repair and operator break room construction
<b>April 17-18, 2021</b>	Gateway MAX Improvements	Rail repair
<b>May 15-23, 2021</b>	Gateway/NE 33rd	Rail repair
<b>Oct 10-23, 2021</b>	Lloyd District	Rail repair and switch replacement
<b>Apr 2-9, 2022</b>	Gateway to PDX	MAX Red Line improvement project (Better Red)



## Rail crossing safety improvements

TriMet has constructed a number of safety improvements at rail crossings in the reporting period. Based on demographic analysis, general project information was mailed to neighbors in English and Spanish. One staff member served as a central point of contact for neighbors, businesses and property owners, keeping them informed about construction activities and problem-solving concerns as they arose.

## Board Redistricting

TriMet conducted public outreach from February to April of 2022 to comply with the Oregon Secretary of State's directive to reassess the boundaries of the seven board districts that make up the TriMet Service area. This is to make sure the districts are balanced when it comes to population after each census. New data from the 2020 census showed an increase of over 182,000 from the previous census. TriMet staff created three scenarios that redraw the district map to roughly balance the populations in each district.

In this effort TriMet presented the scenarios to the TriMet Board of Directors on February 23, 2022 and explained the redistricting process. A redistricting webpage with a language translation tool was created for the public explaining the scenarios and asked for written comment and offered two virtual public meetings on April 5 in Spanish and April 6 in English. An additional opportunity to comment came at the April 27 Board meeting. The public meetings were promoted via news releases, *TriMet On The Move* newsletter, stories in local newspapers and social media. Ten written comments and phone calls were received.

## General Manager Hiring

In February 2021, TriMet began an international search for a new general manager and initiated an outreach process to take the pulse of the community and gather feedback on the qualities and priorities for the person who will set and lead the strategic direction of TriMet.

Community feedback also provided the tools to update the job description, inform the interview questions and the TriMet Board's overall evaluation and decision. A webpage with translation tool was launched February 15 the background on the search process, job description, virtual public meeting information, Board meeting information, and the search timeline. Promotion was done by media releases, newsletters, a story in the Portland Tribune, social media ads, email blasts to over 10,000 people and an online survey in multiple languages.

Virtual public meetings were held on March 8, 9, 11 and 12. Three in English and one in Spanish. We received 3,428 responses to the survey, 191 virtual meeting attendees that garnered 83 comments.

## Reimagining Public Safety

With the support of a third-party analysis of the security challenges facing the region and the feedback from riders and employees, we convened a Transit Public Safety Advisory Committee of regional thought leaders, community representatives and national transit experts. The committee used the feedback gathered through the surveys and the listening sessions, the research results, and the local transit system analysis, to develop recommendations for TriMet's leadership to consider in moving the system forward with community informed strategies.

Between July and November 2020 we received over 13,000 survey responses, supported 300

one-on-one interviews and engaged 271 people in 31 focus groups. We received feedback in English, Arabic, French, Khmer, Lao, Russian, Spanish, Swahili, Ukrainian, Japanese, Korean, Chinese, Rohingya, and Vietnamese.

## 2022 Community Survey

In 2022, TriMet embarked on a comprehensive service analysis called Forward Together. The goal of the analysis is to determine how commutes, work locations, and transit use have evolved since remote working and a surge in job changes have altered how transit is used. The process is scheduled to be completed in April of 2023 when the TriMet will be presented with various transit changes that have been reviewed and commented on by the general public.

We began the process with a Future Transit Survey in multiple languages sent to various community organizations asking for feedback on the kind of service needed today, what priorities should be considered. The survey was distributed through email blasts and social media ads in multiple languages and included a price drawing for those over 18. The survey garnered 5,214 responses that will inform the next phase of outreach starting in September 2022.

## 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).*

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## 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, 2016-2020 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](http://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 7.6 percent with the largest proportion consisting of Spanish speaking LEP individuals (3.3 percent).

The top five languages (Spanish, Vietnamese, Chinese, Russian and Korean) identified using US Census American Community Survey Tables: 2016 - 2020 (5-Year Estimates) mirror the top five languages identified in the 2019 Four Factor Analysis performed by TriMet using the ACS 20122016 five-year sample data. These top five languages comprise 76.1 percent of the total LEP population as shown in Table I-4.

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 24 (

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	51,133	3.3%	<b>43.1%</b>
Vietnamese	14,807	1.0%	<b>12.5%</b>
Chinese (Cantonese, Mandarin)	10,611	0.7%	<b>8.9%</b>
Russian	9,989	0.6%	<b>8.4%</b>
Korean	3,824	0.2%	<b>3.2%</b>
Arabic	2,748	0.2%	<b>2.3%</b>
Ukrainian	2,713	0.2%	<b>2.3%</b>
Tagalog	2,042	0.1%	<b>1.7%</b>
Japanese	1,858	0.1%	<b>1.6%</b>
Khmer	1,486	0.1%	<b>1.3%</b>
Persian/Farsi	1,118	0.1%	<b>1.0%</b>
Other (e.g., Somali and Thai)	22,171	1.4%	<b>18.9%</b>

Total	118,646	7.6%
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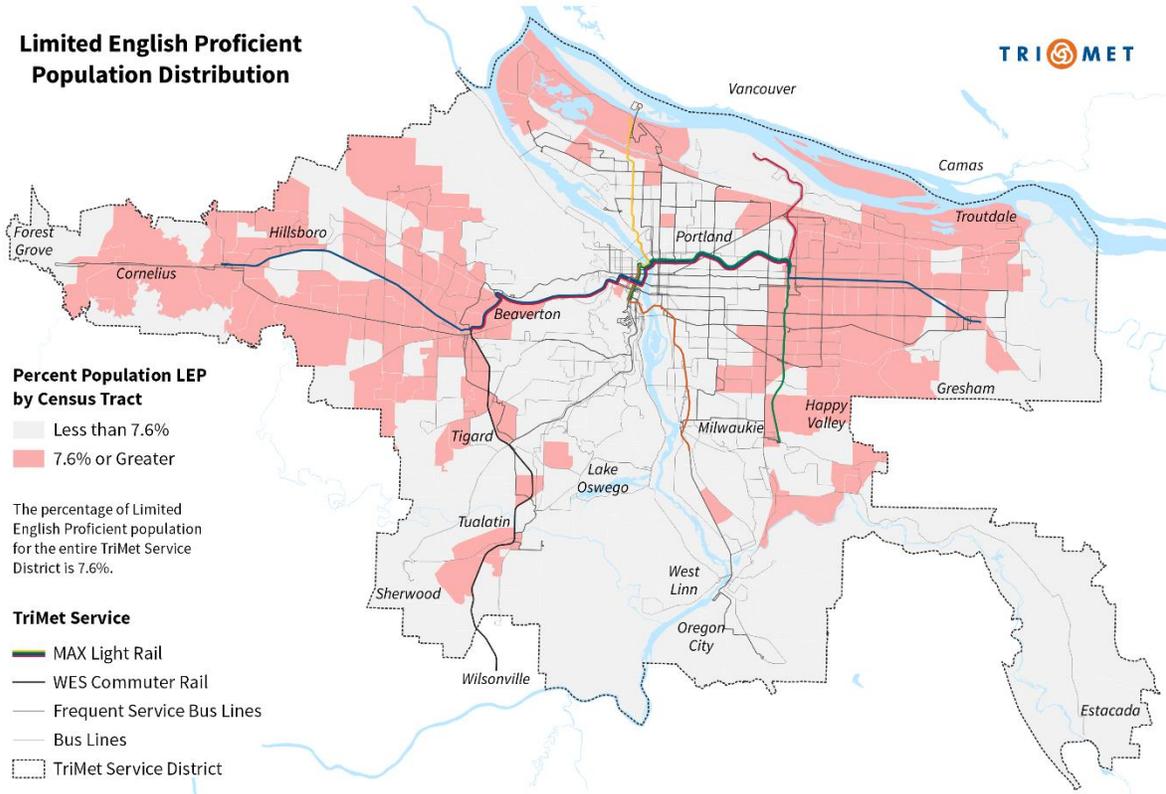
Sources: TriMet GIS, Metro Regional Land Information System, and US Census ACS Tables: –2016-2020 (5-Year Estimates).

### 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 took place in fiscal year 2020. Existing channel cards shown in Figures I-4 through I-6 have been placed in all vehicles. TriMet continuously modifies and updates this material as illustrated by the current and prior Rules For Riding cards in figure I-6 . TriMet also expanded the number of languages included in its “How to Ride brochure”. Figure I-7 shows the updated brochure cover.

## Limited English Proficient Population Distribution



**Percent Population LEP by Census Tract**

- Less than 7.6%
- 7.6% or Greater

The percentage of Limited English Proficient population for the entire TriMet Service District is 7.6%.

**TriMet Service**

- MAX Light Rail
- WES Commuter Rail
- Frequent Service Bus Lines
- Bus Lines
- TriMet Service District

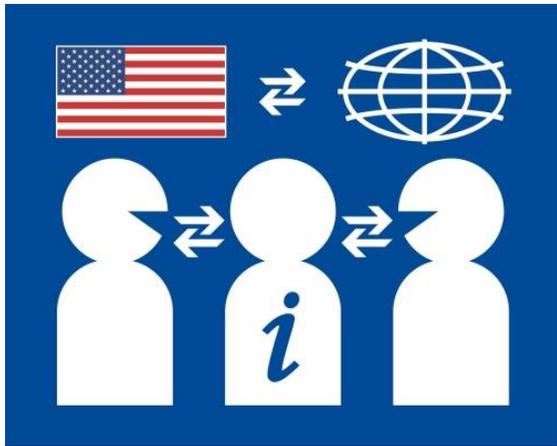
Limited English Proficient (LEP) are persons who do not speak English as their primary language and have limited ability to read, speak, write, or understand English. These individuals are captured as speaking English less than "very well" in the American Community Survey.

Data: Metro RLIS, TriMet, US Census Bureau, Table C16001 Language Spoken at Home for the Population 5 Years and Over 2016-2020 American Community Survey 5-Year Estimates  
 G:\PUBLIC\GIS\Title\_VI\Title\_VI\_Program\_Update\2022\qgis\LEP\_TriMet\_Total.qgz



7/26/22

**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

SEE SOMETHING? SAY SOMETHING.

If you see suspicious behavior  
or a suspicious package:



Tell a TriMet  
employee

|  
OR  
|



**¿Ve algo extraño?**

*Díganos si ve comportamiento extraño o un paquete sospechoso.  
Comuníquese con un empleado de TriMet o llame al 9-1-1.*



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.*



**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.*



**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.*



**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!*



**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.*

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.*



**Don't be so loud that you disturb others.**

*No haga ruidos que molesten a los demás.*



**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.*



**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 block the aisles or doors.**

*No bloquee los pasillos o puertas.*



**Don't threaten or intimidate riders or operators.**

*No amenace ni intimide a otros pasajeros ni al conductor.*



**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.*

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

FIGURE I-6: BILINGUAL RULES FOR RIDING CHANNEL CARDS



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

ឥណ្ឌូស៊ីយ៉ា ធីនីយ៍ប្រើប្រាស់ប្រព័ន្ធ

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

## 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**	1,647,046	69.0%	13.1%	3.5%	8.5%	0.5%	0.5%	5.1%
Board of Directors	7	29%	14%	29%	29%	0%	0%	0%
Finance & Audit Committee	3	67%	33%	0%	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

\*\*US Census American Community Survey 2016-2020 (5-Year Estimates) Table B03002. Hispanic or Latino Origin by Race

### Board and Committee Recruitment

**TriMet's Board of Directors** is made up of seven members appointed by the Governor of Oregon. 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.

## 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 Civil Rights and Equity Programs Manager, 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, Civil Rights and Equity Programs Manager, 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.

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### *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 subrecipient's 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, 2019) and every three years after initial submission on August 15. TriMet reviews all subrecipient Title VI Programs on a triennial basis and also receives and reviews annual reports submitted by August 15.

## FACILITIES SITING AND CONSTRUCTION

Since the last Title VI Program submission in 2019, TriMet has not selected any new sites meeting the applicable definitions under Title VI, and requiring an equity analysis.). 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,

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*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.*

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

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*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.*

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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 2019, and are provided as Attachments I – M, along with corresponding documentation of the TriMet board’s consideration, awareness, and approval of each

- **Ordinance No. 359: Adopting Service Enhancement Plan, March 25, 2020**

- 
- **Ordinance No. 360: Rosa Parks Free Fare Day; January 27, 2021**
- 
- **Ordinance No. 362: Pandemic Service Reductions; January 27, 2021**
- 
- **Ordinance No. 363: FY2022 Annual Service Plan Equity Analysis; April 28, 2021**
- 
- **Ordinance No. 366: FY2023 Annual Service Plan Equity Analysis; April 27, 2022**
- 
- **Ordinance No. 367: Adopting Service Change to due Operator Shortage; May 25, 2022**
- 
- **Amending and Updating Chapters related to public comment and Title VI analysis concerning fare and service changes; August 10, 2022**
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## Part II: Title VI Policies

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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 website<sup>5</sup>, 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.

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

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 either increased or 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 cumulative 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 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.

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.

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*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...*

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

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### *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.*

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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.

## 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.

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### *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....*

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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 non-low-income riders. When low-income populations or riders will experience a 10% (or more) greater adverse effect than that borne by the non-low-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 non-low-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.

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# Part III: System-Wide Service Policies and Standards

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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.

Seventeen 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. Additionally, TriMet maintained 15 min. or better service on all Frequent Service Lines during the COVID-19 pandemic.

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 68 percent of the population of the TriMet Service District (about 1,088,000 of a total of 1.6 million). Among minority populations living in the TriMet district, 75 percent are served by at least one Frequent Service line, while 88 percent of people living with a low-income are served by at least one Frequent Service line.

## **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. Reliability has increased significantly with the reduction in traffic due to the COVID-19 pandemic. Reliability is expected to decrease somewhat as the pandemic continues to subside and more people are driving again. As a result, TriMet and the City of Portland have been adding "bus only" lanes throughout the city to help sustain the improved reliability gained during the pandemic.

## **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.

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 2022 includes 696 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 144 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.

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### *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.*

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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 "non-low-income" routes.

As of May 2022, TriMet operates 11 completely electric busses serving lines 6, 20, and 62, which are considered minority lines. 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 non-low-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.

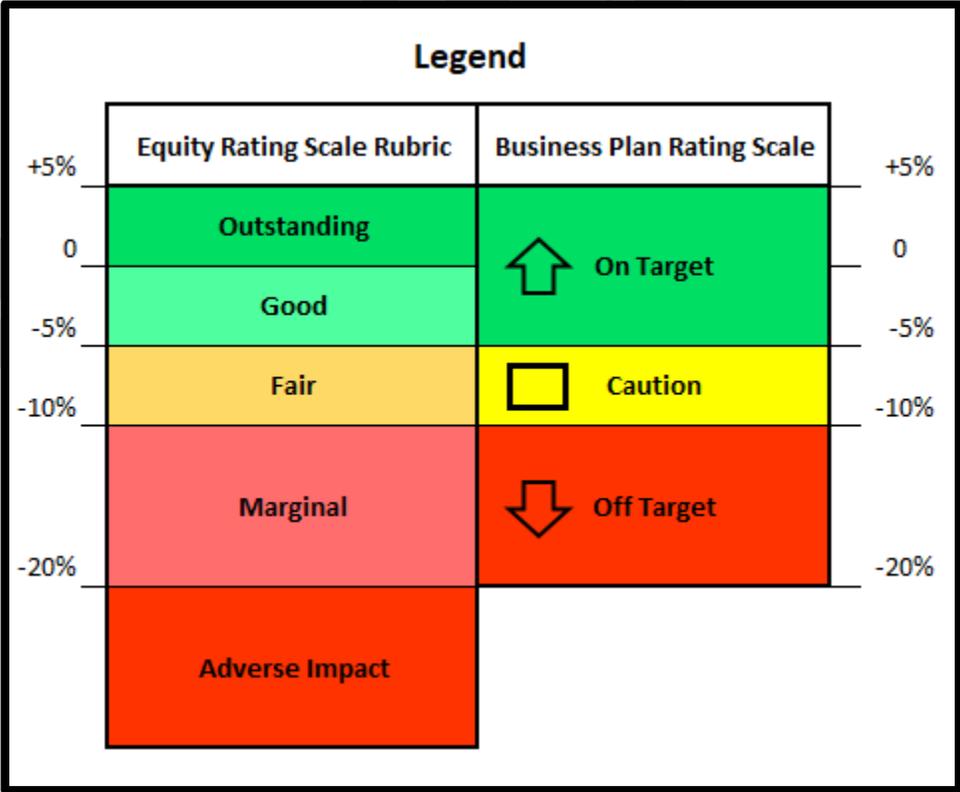


FIGURE IV-1: TITLE VI EQUITY RATING SCALE RUBRIC

TriMet monitors the following service and performance metrics:

1. “Minority” and “Non-minority” Routes
2. “Low-income” and “non-low-income” Routes
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 ROUTES

“Minority” Routes, 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 91 lines, including 83 bus routes, 5 MAX light rail lines, and 1 WES commuter rail line. Of these, 47 bus routes, 4 MAX lines, and WES commuter rail are considered minority routes/lines. The remaining 39 bus routes 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 Spring 2022, Minority lines account for 66% of TriMet system service (measured by revenue hours). 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 routes.

## 2. LOW-INCOME & NON-LOW-INCOME ROUTES & LINES

“Low-income” bus routes and or Max 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. 49 bus lines, 5 MAX lines, and the WES commuter rail are considered low-income lines, and accounted for 78% of TriMet’s service in the Spring of 2022. The remaining 36 bus routes are considered non-low-income routes.

As of Spring 2022, Low Income bus routes and max lines accounted for 88% of TriMet system service (measured by revenue hours), and 90% of system boarding rides.

## 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. Sunday service MAX on minority lines was less frequent than non-minority lines.
  4. A higher proportion of non-minority bus lines operate on Saturday (71 percent) and Sunday (68 percent) than minority bus lines on Saturday (57 percent) and Sunday (57 percent). All MAX lines operate on Saturday and Sunday.
  5. The average span of service on non-minority lines exceeds the span of service on minority lines for bus and MAX on weekdays, Saturdays, and Sundays.
- Minority bus lines on average provide more frequent service than non-minority lines, where non-minority MAX lines provide more frequent service than minority MAX lines during the evenings and weekends. The span of service on non-minority lines was greater than that for minority lines. Thus, there may be a Disparate Impact on minority populations in regard to span of service on bus and MAX and in regard to service frequency on MAX.

**Table IV-2: Frequency and Span of Service**  
 Minority and Non-Minority Transit Lines by Mode and Day of Service  
 Spring 2022 Service – Weekdays Only

Day of Service	Mode of Service	Line Classification	No. of Lines in Service	% of Weekday Lines in Service	Average Frequency of Service (mins.) <sup>1</sup>						Span of Service (hours) <sup>2</sup>
					Early AM	AM Peak	Midday	PM Peak	Evening	Night	
Weekday	<b>Bus</b>	Minority Lines	42	100%	26.5	24.8	25.1	25.1	25.9	32.9	15.1
		Non-Minority Lines	31	100%	34.8	30.6	30.3	33.5	34.2	39.9	16.3
		All bus lines	73	100%	29.4	27.1	27.2	28.2	28.8	27.2	15.8
	<b>MAX Light Rail</b>	Minority Lines	4	100%	26.2	16.1	15.0	15.0	18.6	27.8	21.6
		Non-Minority Line	1	100%	33.9	16.1	15.0	15.0	15.0	20.9	22.3
		All MAX lines	5	100%	27.2	16.1	15.0	15.0	17.8	26.5	21.5
	<b>WES Commuter Rail</b>	Non-Minority Line	1	100%	30.0	30.0	—	30.0	30.0	—	9.2
	<b>System</b>	Minority Lines	47	100%	26.5	23.5	24.5	23.6	24.5	31.3	15.3
		Non-Minority Lines	32	100%	4.8	29.7	29.3	32.3	32.3	37.4	16.8
All lines		79	100%	29.2	25.8	25.7	26.9	27.1	33.4	16.2	

**Notes:**

<sup>1</sup> 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.

<sup>2</sup> 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  
Spring 2022 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.) <sup>1</sup>				Span of Service (hours) <sup>2</sup>
					Early AM	Day	Evening	Night	
Saturday	<b>Bus</b>	Minority Lines	24	57.1%	33.2	23.7	30.3	35.1	15.3
		Non-Minority Lines	22	71.0%	37.0	28.5	35.5	39.6	16.6
		All bus lines	46	54%	34.7	25.7	32.3	37.0	16.0
	<b>MAX Light Rail</b>	Minority Lines	4	100%	31.8	16.5	22.8	28.4	20.3
		Non-Minority Line	1	100%	30.0	15.4	15	21.1	22.0
		All MAX lines	5	100%	31.5	16.3	21.1	27.0	20.6
	<b>System</b>	Minority Lines	28	59.6%	32.8	22.3	28.3	32.7	15.5
		Non-Minority Lines	23	78.9%	36.3	27.5	32.9	36.8	17.3
		All lines	51	64.6%	34.0	24.2	30.0	34.2	16.5

**Notes:**

<sup>1</sup> 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.

<sup>2</sup> 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-4: Frequency and Span of Service**  
 Minority and Non-Minority Transit Routes by Mode and Day of Service  
 Spring 2022 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.) <sup>1</sup>				Span of Service (hours) <sup>2</sup>
					Early AM	Day	Evening	Night	
Sunday	<b>Bus</b>	Minority Transit Routes	24	57.1%	33.2	23.7	30.3	35.1	15.3
		Non-Minority Transit Routes	21	67.7%	37.0	28.5	35.5	39.6	16.6
		All bus lines	45	61.6%	34.7	25.7	32.4	37.0	16.0
	<b>MAX Light Rail</b>	Minority routes	4	100%	31.8	16.5	22.8	28.4	20.3
		Non-Minority Line	1	100%	30	15.4	15.0	21.1	22.0
		All MAX lines	5	100%	31.5	16.3	21.2	27.0	21.6
	<b>System</b>	Minority Lines	28	59.6%	32.8	22.3	28.3	32.7	15.5
		Non-Minority Lines	22	71.9%	36.3	27.5	32.9	36.8	17.3
		All lines	50	63.3%	34.0	24.2	30.0	34.2	16.5

**Notes:**

<sup>1</sup> 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.

<sup>2</sup> 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 routes and MAX lines is compared between minority/non-minority and low-income/ non-low-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-5: On-Time Performance**  
 Minority and Non-Minority Transit Routes & Lines by Mode and Day of Service  
 Weekday, Saturday, Sunday  
 Spring 2022 Service

Mode of Service	Day	Avg. % On-Time (weighted)		Difference; Minority to Non-Minority +/-(-)
		Minority Transit Routes	Non-Minority Transit Routes	
Bus	Weekday	90.97%	89.23%	2
	Saturday	91.86%	90.96%	1
	Sunday	93.33%	93.95%	(1)
MAX Light Rail	Weekday	88.43%	91.00%	(2)
	Saturday	86.95%	86.10%	(2)
	Sunday	86.75%	89.40%	(2)
WES Commuter Rail	Weekday	99.30%	n/a	n/a

Notes:

<sup>1</sup>For 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 measure at time points. 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 non-low-income than the performance on non-minority bus lines for weekdays and Saturdays, and slightly lower than non-minority bus lines on 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 99.3 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-6: On-Time Performance**

Low-income and non-low-income Transit Routes & Lines by Mode and Day of Service  
Weekday, Saturday, Sunday  
Spring 2022 Service

Mode of Service	Day	Avg. % On-Time (weighted)		Difference; Low Income to Non-low-income +/- )
		Low Income Routes or Lines	Non-low-income Routes or Lines	
Bus	Weekday	90.91%	90.22%	1
	Saturday	92.55%	91.59%	1
	Sunday	94.25%	94.25%	0
MAX Light Rail	Weekday	88.36%	n/a	n/a
	Saturday	86.52%	n/a	n/a
	Sunday	86.54%	n/a	n/a
WES Commuter Rail	Weekday	99.3%	n/a	n/a

Notes:

<sup>1</sup>For 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 is generally comparable for both bus lines with performance on Weekdays and Saturday being slightly better for low income routes.
  2. All MAX lines are considered low-income.
  3. WES on-time performance is 99.3 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 non-low-income 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-8: Vehicle Loads**  
Minority and Non-Minority Transit Routes & Lines  
Spring 2022 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	0.31	9.41	0.26	9.49
	Midday	0.23	8.75	0.21	7.71
	PM Peak	0.26	9.96	0.24	9.03
MAX Light Rail (128 seats)	AM Peak	0.31	39.50	0.34	43.00
	Midday	0.34	43.63	0.27	34.00
	PM Peak	0.47	59.88	0.34	43.00
	AM Peak	0.17	18.00	n/a	n/a

WES Commuter Rail (146 seats)	PM Peak	0.29	21.00	n/a	n/a
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<sup>1</sup>AM 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 0.26 to a high of .47, well within the established load factor limits for each service.
  2. Minority bus routes & Max lines have somewhat higher loads than non-minority lines across, with the exception of PM Peak service for 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-9: Vehicle Loads**  
Low-income and Non-low-income Transit Routes & Lines  
Spring 2022 Service

Vehicle Type	Time Period	Low-Income Routes or Lines		Non-low-income Routes or Lines	
		Load/Seat Ratio	Mean Load	Load/Seat Ratio	Mean Load
Bus (28 or 39 seats)	AM Peak	0.30	11.60	0.19	6.04
	Midday	0.25	9.61	0.17	6.39
	PM Peak	0.31	11.84	0.18	6.54
MAX Light Rail (128 seats)	AM Peak	0.31	40.20	n/a	n/a
	Midday	0.33	41.70	n/a	n/a
	PM Peak	0.44	56.50	n/a	n/a
WES Com-muter Rail (146 seats)	AM Peak	0.17	18.00	n/a	n/a
	PM Peak	0.29	21.00	n/a	n/a

## Findings

1. Average load/seat ratios range from a low of 0.17 to a high of 0.44.
2. Low-income lines have larger loads than non-low-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 population 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-10 on the next page presents the availability of service by mode for Fall 2021 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 (19 percent vs. 15 percent) and WES (1.2 percent vs. <1 percent).
  2. The percent of low-income population with service available exceeds that of the non-low-income populations for bus (93 percent vs. 87 percent), MAX (24 percent vs. 15 percent) and WES (1.3 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-10: Availability of Service by Mode**  
 Minority/Non-Minority and Low-Income/ Non-low-income Population  
 TriMet District  
 Fall 2021 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
<b>Popula- tion</b>	Total (ACS 5 year estimate, 2016-2022)	1,647,046	100.0%	88.1%	16.4%	0.9%	51.5%	67.9%
<b>Minority</b>	All Minorities**	511,388	31.0%	89.9%	19.4%	1.2%	55.0%	74.4%
<b>Non-Mi- nority</b>	White (Non-Hispanic)	1,135,659	69.0%	87.4%	15.1%	0.7%	49.9%	65.1%
<b>Popula- tion</b>	Total population with known income (ACS 5 year estimate, 2016-2020)***	1,625,299	100.0%	88.1%	16.3%	0.9%	51.3%	67.7%
<b>Income</b>	Below 150% of Poverty Level	277,968	17.1%	93.1%	23.5%	1.3%	65.4%	88.8%
<b>Income</b>	Above 150% of Poverty Level	1,347,331	82.9%	87.1%	14.9%	0.8%	48.4%	63.3%

**Sources:** TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Tables: 2016 - 2020 (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 December 2021 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.

DRAFT

## 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-11 shows the percentage of stops along minority and non-minority lines containing each amenity. Table IV-12 shows the percentage of stops along low-income and non-low-income lines containing each amenity.

**Table IV-11: Stop Amenities on Minority and Non-Minority Lines  
Spring 2022**

<b>Category of Amenity</b>	<b>Pct. of Stops on Minority Lines</b>	<b>Pct. of Stops on Non-Minority Lines</b>
Seating	39%	29%
Lighting	57%	64%
Elevators	<1%	<1%
Digital Displays	8%	4%
Shelters	21%	15%
Signs, Maps and/or Schedules	90%	85%
Waste Receptacles	17%	11%

**Table IV-12 Stop Amenities on Low-Income and Non-low-income Routes or Lines  
Spring 2022**

<b>Category of Amenity</b>	<b>Pct. of Stops on Low-Income Routes or Lines</b>	<b>Pct. of Stops on Non-low-income Routes or Lines</b>
Seating	40%	25%
Lighting	60%	61%
Elevators	<1%	0%
Digital Displays	9%	3%
Shelters	23%	9%
Signs, Maps and/or Schedules	90%	84%

Waste Receptacles	19%	7%
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## 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 (64 percent compared to 57 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 Non-low-income lines in all categories examined with the exception of lighting, which is slightly higher for non-low-income lines (61 percent compared to 60 percent of stops). However, this is within the system-wide Disparate Impact threshold of 20%.
- 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-13.

**Table IV-13: Vehicle Assignment**  
Average Age of Vehicles Assigned by Mode  
Spring 2022 Service

Mode of Service	Average Age of Vehicles (years)		Difference; Minority to Non-Minority +/-(-)
	Minority Routes / Lines	Non-Minority Routes / Lines	
Bus	7.26	6.45	(.81)
MAX Light Rail	20.17	21.04	1.87
WES Commuter Rail	Primary: 15.5 Spares: 70.0	n/a	n/a

## Finding

1. The average age of vehicles on minority bus lines (7.26 years) is about 13% older than the average age of vehicles on non-minority bus lines (6.45 years). This is within the system-wide Disparate Impact threshold of 0%.
  2. The average age of vehicles on minority MAX lines (20.17 years) is about 4% newer than the average age of vehicles on non-minority MAX lines (21.1 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 non-low-income lines. Vehicle assignment for low-income and non-low-income lines is shown in Table IV-11.

**Table IV-14: Vehicle Assignment**  
Average Age of Vehicles Assigned by Mode  
Spring 2022 Service

Mode of Service	Avg. Age of Vehicles (Years)		Difference; Low Income to Non-low-income +/-(-)
	Low Income Routes/ Lines	Non-low-income Lines	
Bus	6.53	7.39	(.86)
MAX Light Rail	20.34	n/a	n/a
WES Commuter Rail	Primary: 12.0 Spares: 66.5	n/a	n/a

## Findings

1. The average age of vehicles on low-income bus routes (6.53 years) is 12% less than the average age of vehicles on non-low-income bus routes (7.39 years)
  2. The MAX lines are considered low-income. The average age is 20.3 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-13 and Table IV-14, 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/ non-low-income lines, and minority/low-income populations have better access to the TriMet system based on residential proximity to service.

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**Table IV-15: Evaluation and Findings – Service Standards and Policies**  
 Comparison of Minority and Non-Minority Lines  
 Spring 2021

Equity Metric: Distribution of Amenities Spring 2021												
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 Spring 2021												
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
<b>Vehicle Loads</b> If the average load of minority lines is above the maximum load factor, comparison to average load of non-minority lines.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
<b>Service Frequency &amp; Span</b> Revenue hours of service provided on minority vs. non-minority lines.	✓	✓	✓	✗	✓	✓	✗	✓	✓	✗	✓	✗
<b>On-Time Performance</b> Average percent on-time for minority vs. non-minority lines.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✗	✓	✗
<b>Vehicle Assignment</b> Average age of vehicles serving minority vs. non-minority lines.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
<b>Service Availability</b> 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-16: Evaluation and Findings – Service Standards and Policies**  
 Comparison of Low-Income and non-low-income Routes & Lines  
 Spring 2021

Equity Metric: Distribution of Amenities Spring 2021				
Metric	<= 20% Difference	<=10% Difference	<=5% Difference	As good or better on low-income lines
% of stops with amenity on low-income vs. non-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 Spring 2021												
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												
<b>Vehicle Loads</b> If the average load of low-income lines is above the maximum load factor, comparison to average load of non-low-income lines.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
<b>Service Frequency &amp; Span</b> Revenue hours of service provided on low-income vs. non-low-income lines.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
<b>On-Time Performance</b> Average percent on-time for low-income vs. non-low-income lines.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✗	✓	✗
<b>Vehicle Assignment</b> Average age of vehicles serving low-income vs. non-low-income lines.	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
<b>Service Availability</b> 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:

- 2016-2020 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.

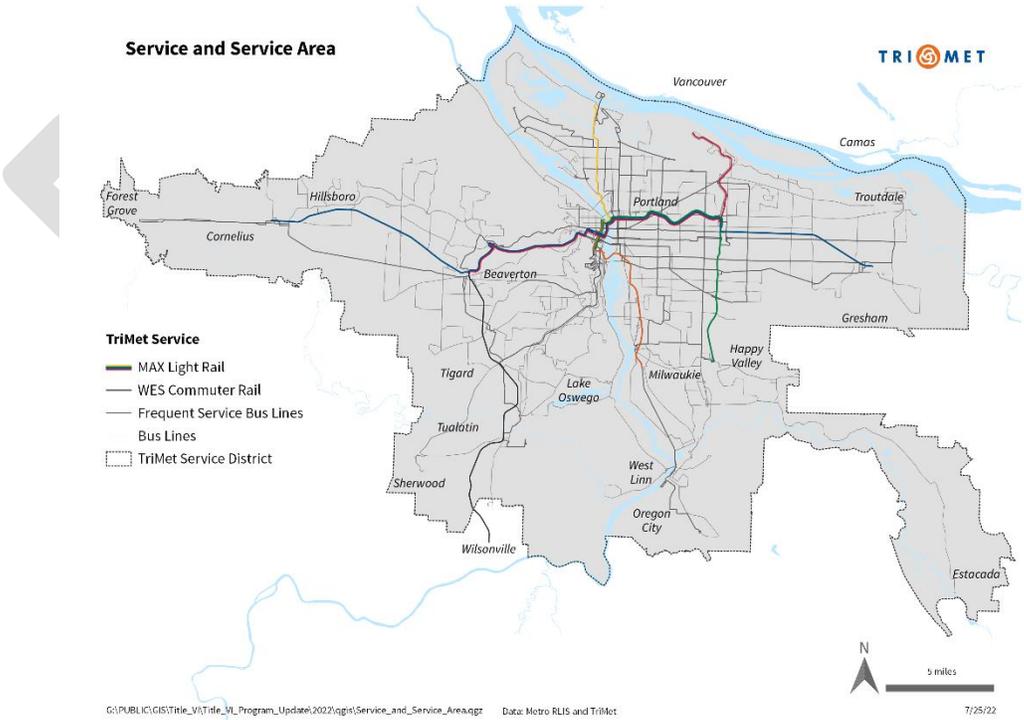
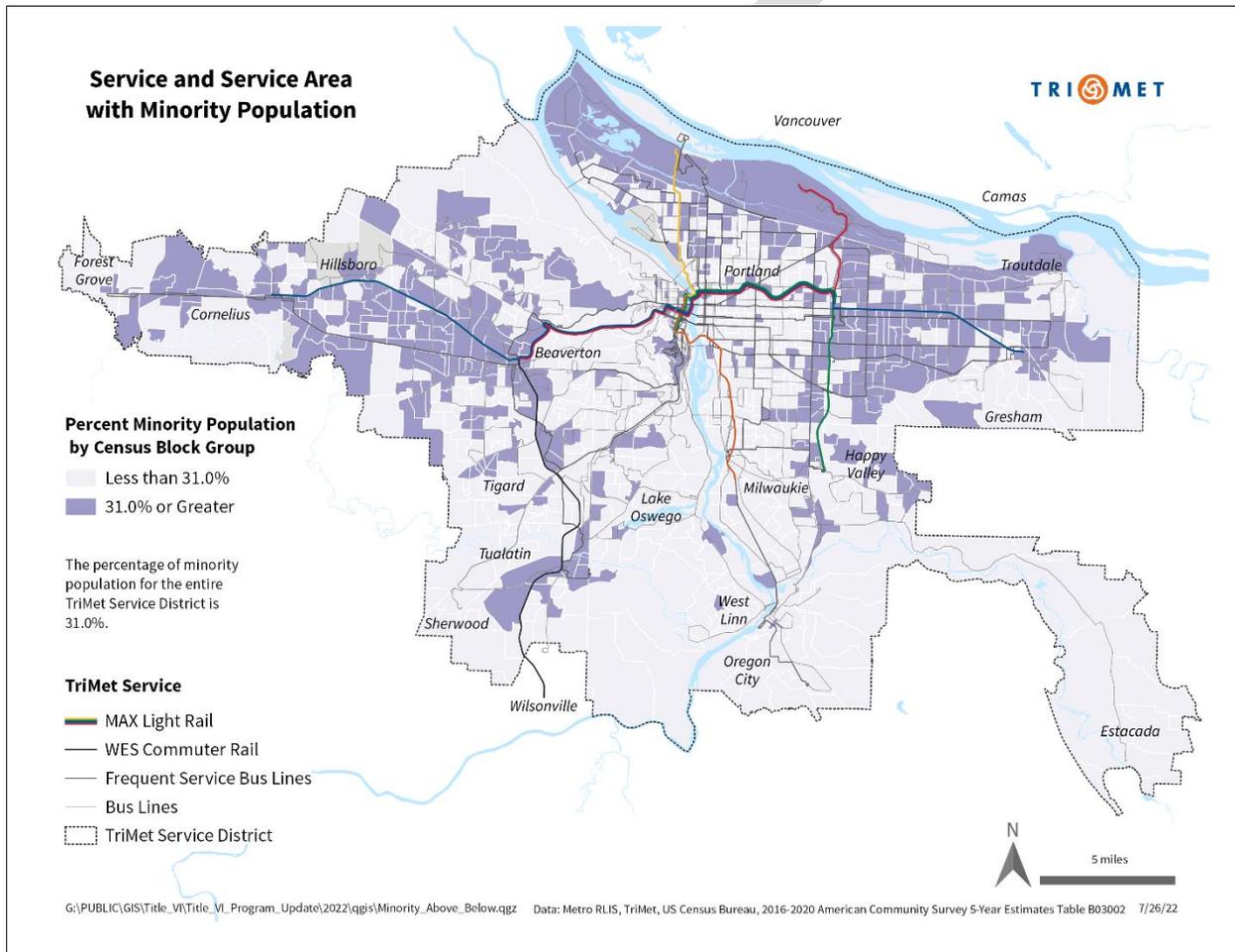


FIGURE V-1: SERVICE AND SERVICE AREA

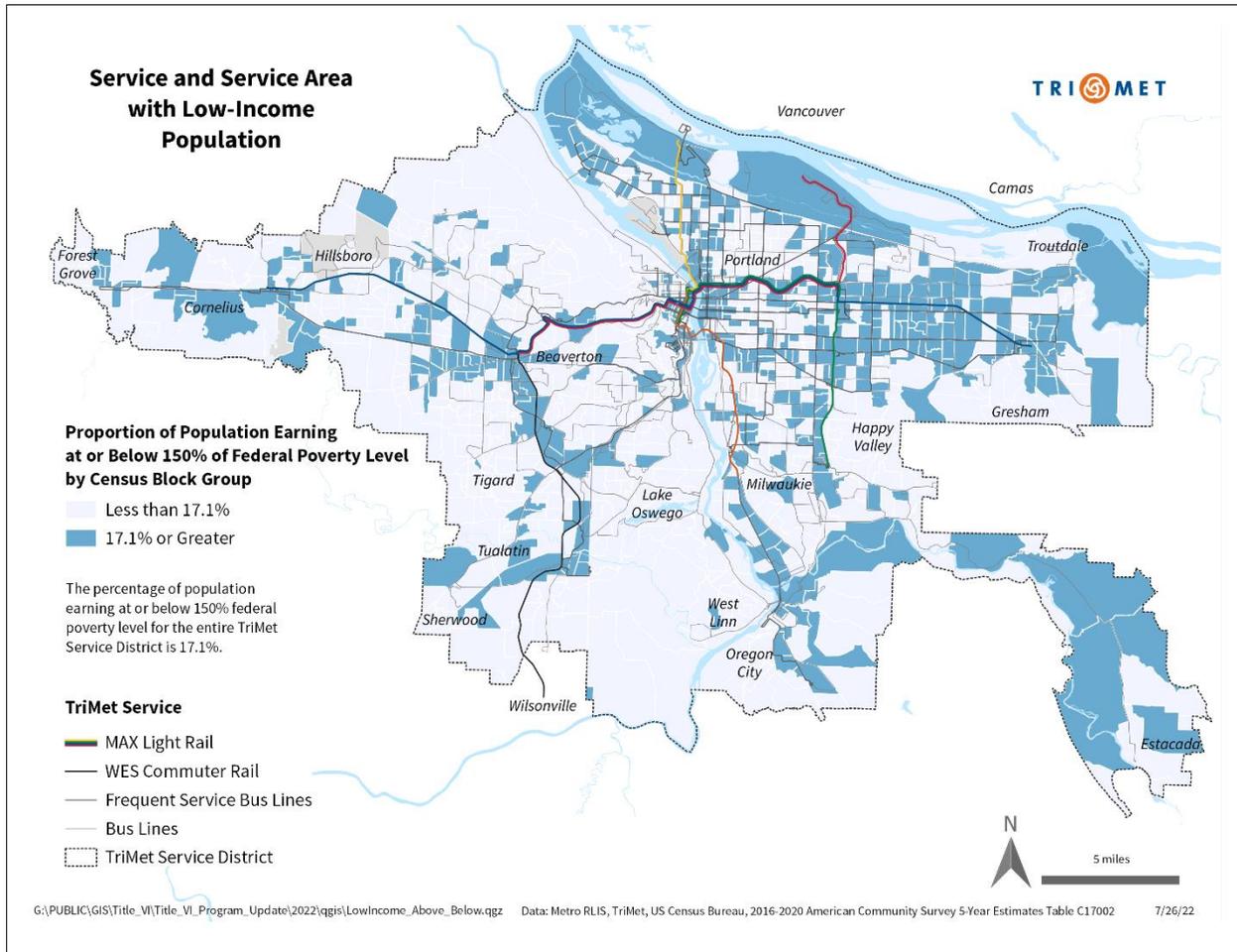
Service Area with **Minority Population** in Figure V-2 depicts the TriMet network in relation to minority population by Census block group. Areas are shaded corresponding to block groups, which had a minority population greater than or equal to the average for the TriMet District (31.0 percent) as of the 2016-2020 ACS. This is an increase from 29.2% indicated in the 2013-2017 ACS.

Patterns are largely similar to TriMet’s 2019 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 2019 they were below average (near Tigard and Tualatin, for example).



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

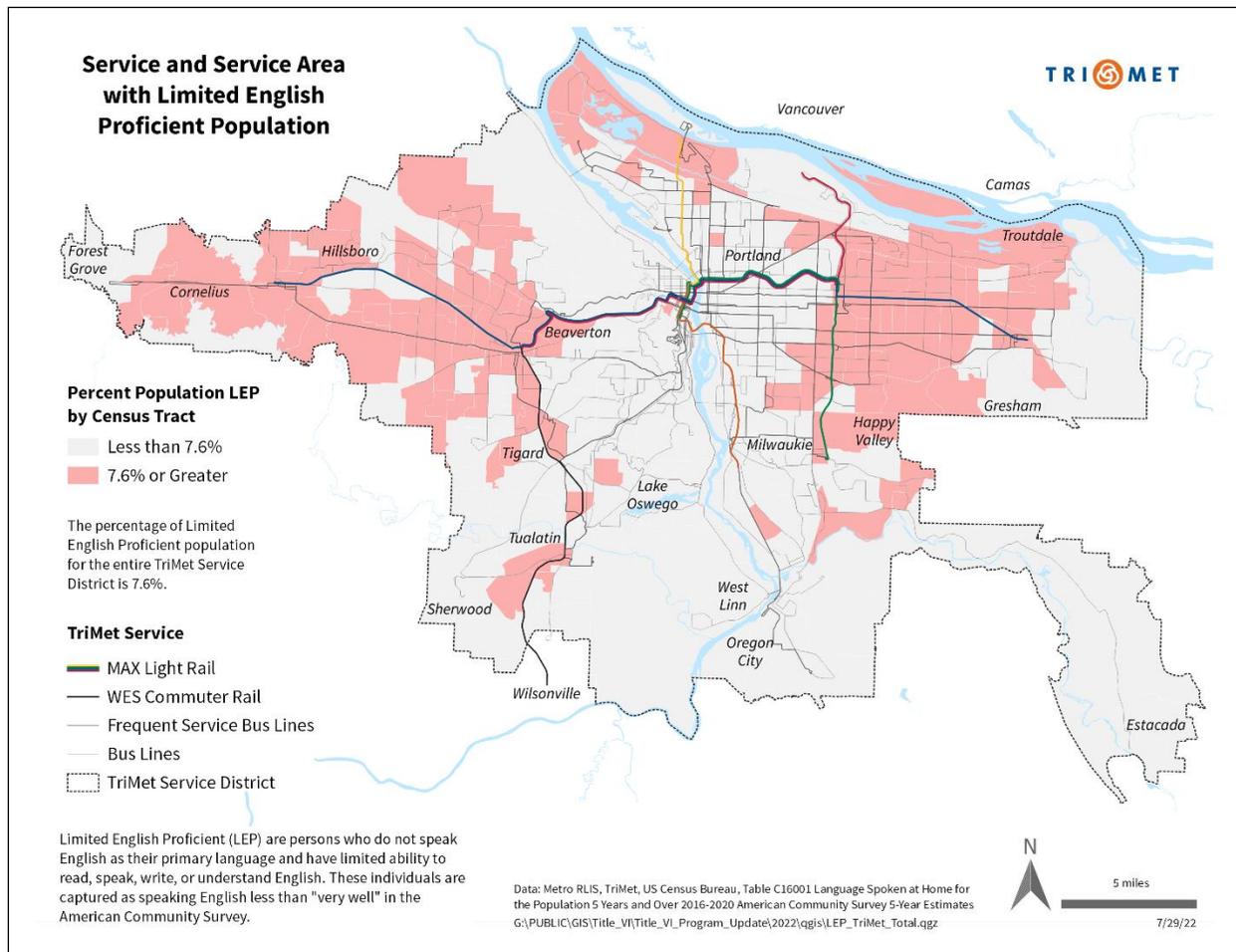
Service and Service Area with **Low-Income Population** in Figure V-3 depicts the TriMet network in relation to low-income population by Census block group. Low-income is defined as earning equal to or less than 150 percent of the Federal Poverty Level. Areas are shaded corresponding to block groups, which had low-income populations greater than or equal to the average for the TriMet District (17.1 percent) as of the 2016-2020 ACS. This is a decrease from 20.7% indicated in the 2016-2017 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 (7.6 percent) as of the 2016-

2020 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.

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**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
<b>Population</b>	Total (ACS 5 year estimate, 2016-2020)	1,647,046	100.0%	88.1%	16.4%	0.9%	51.5%	67.9%
<b>Minority</b>	All Minorities	511,388	31.0%	89.9%	19.4%	1.2%	55.0%	74.4%
	Black (non-Hispanic)	57,430	3.5%	94.2%	23.4%	0.8%	71.0%	94.3%
	Hispanic	214,941	13.1%	91.8%	19.7%	1.8%	59.9%	79.5%
	Asian (non-Hispanic)	139,846	8.5%	86.1%	18.5%	0.4%	41.7%	60.2%
	Native American (non-Hispanic)	8,085	0.5%	89.0%	22.4%	0.7%	61.2%	83.5%
	Hawaiian Native and Pacific Islander (non-Hispanic)	7,549	0.5%	92.8%	28.7%	2.6%	63.8%	92.6%
	Other (Including Mixed Race, non-Hispanic)	83,537	5.1%	88.1%	16.1%	1.1%	52.4%	68.5%
<b>Non-Minority</b>	White (non-Hispanic)	1,135,659	69.0%	87.4%	15.1%	0.7%	49.9%	65.1%
<b>Population</b>	Total population with known income (ACS 5 year estimate, 2016-2020)**	1,625,299	100.0%	88.1%	16.3%	0.9%	51.3%	67.7%
<b>Income</b>	Below 150% of Poverty Level	277,968	17.1%	93.1%	23.5%	1.3%	65.4%	88.8%

Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Tables: 2016 - 2020 (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 December 2021 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)

Due to the pandemic, TriMet has not been able to conduct an updated on site cross vehicle mode in person survey. Our goal is to conduct an updated in person rider survey in the spring of 2023. 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 trips<sup>6</sup> 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

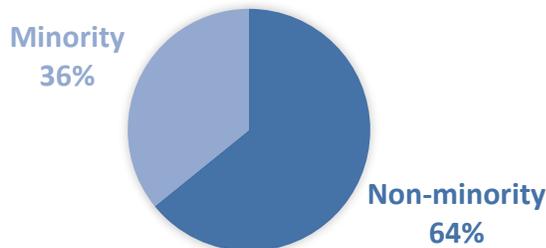


FIGURE V-5 TRIPS BY RACE/ETHNICITY

### TRIPS BY INCOME 2018 FARE SURVEY

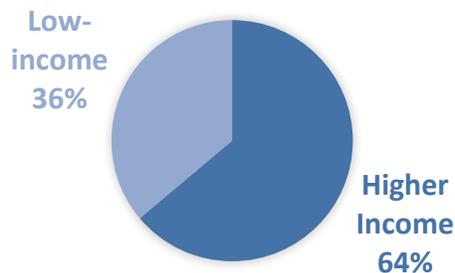


FIGURE V-6 TRIPS BY INCOME

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

Trips are more likely to be made by non-minority and non-low-income riders (64%), consistent with the Portland metro population. When looking at the American Community Survey (ACS) demographic analysis in Table V-1, the TriMet Service district is 71% non-minority and 79% non-low-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)<sup>7</sup>, 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)

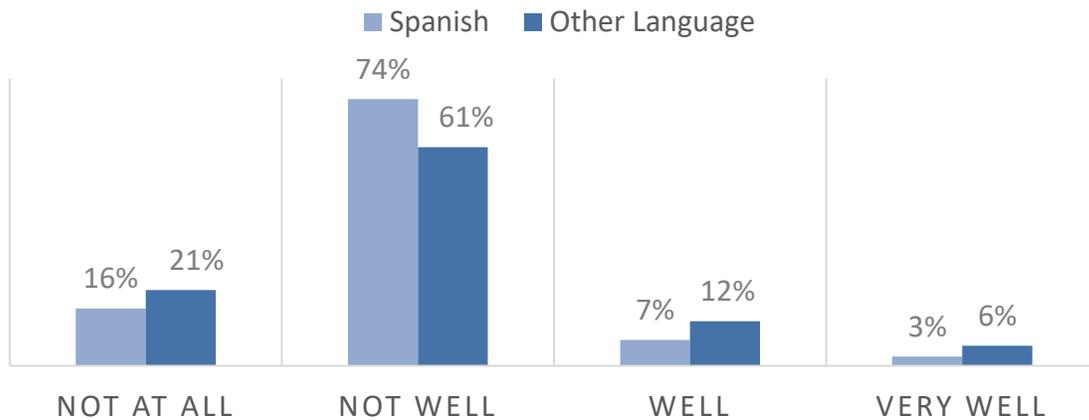


FIGURE V-7 ABILITY TO SPEAK ENGLISH

### 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 non-low income riders. WES commuter rail trips comprise less than 1% of trips for all groups.

<sup>7</sup> 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

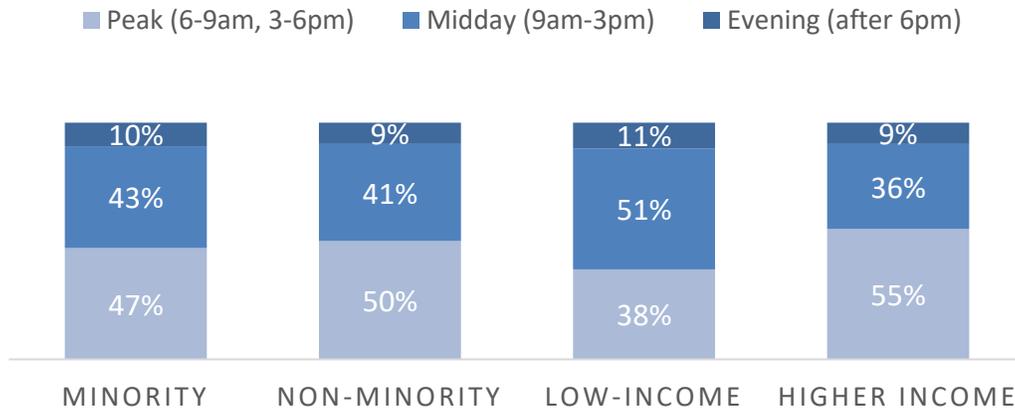


**FIGURE V-8: VEHICLE MODES USED BY RACE/ETHNICITY AND INCOME**

### Ridership by Time of Day

Time of day comparisons show a greater proportion of trips made midday by low-income riders (51%) compared to non-low-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 non-low-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

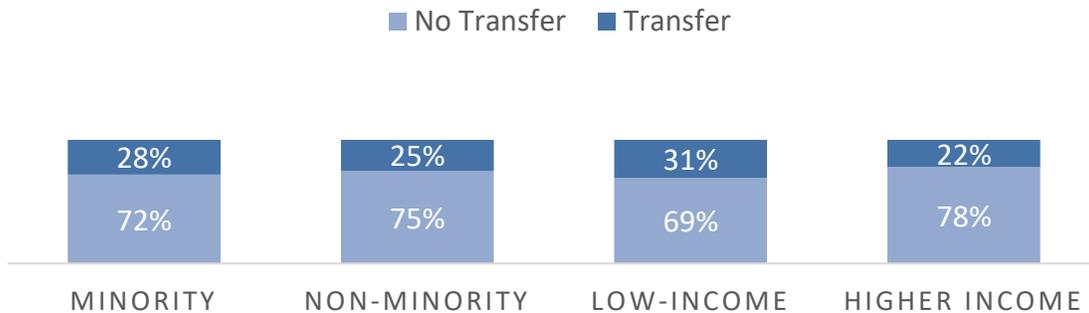


FIGURE V-10: TRANSFER ACTIVITY BY RACE/ETHNICITY AND INCOME

## 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 non-low income.

### HOW OFTEN DO YOU RIDE TRIMET? 2018 FARE SURVEY

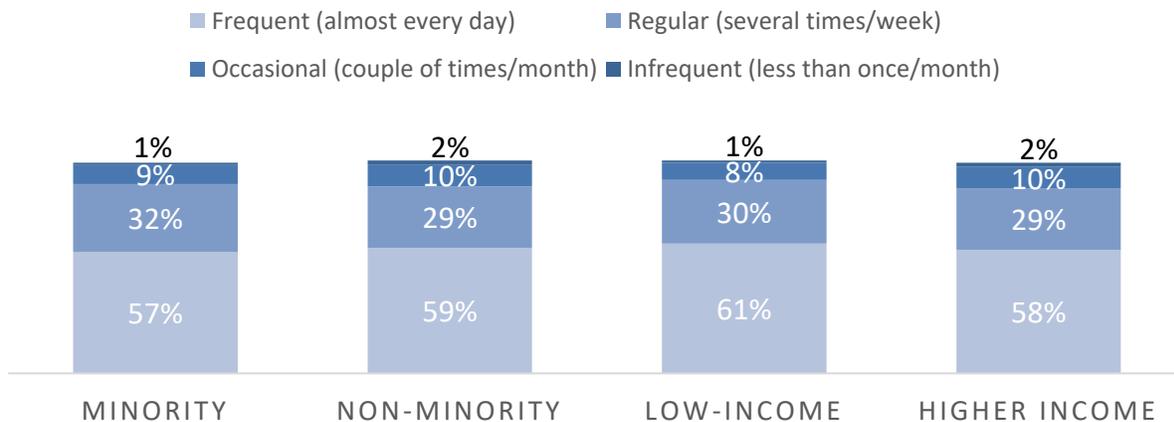


FIGURE V-11: FREQUENCY OF RIDING TRIMET BY RACE/ETHNICITY AND INCOME

### 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 non-low-income (78%) rider responses.

### DO YOU HAVE A CURRENT DRIVER'S LICENSE? 2018 FARE SURVEY

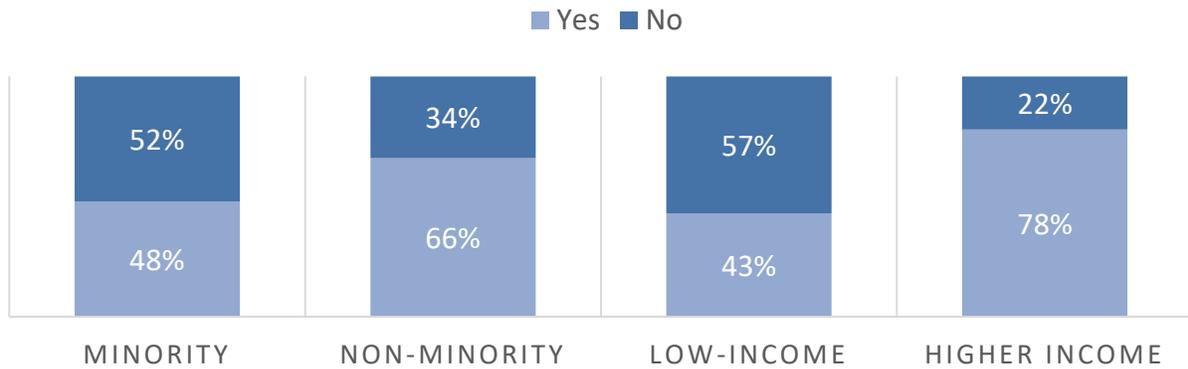
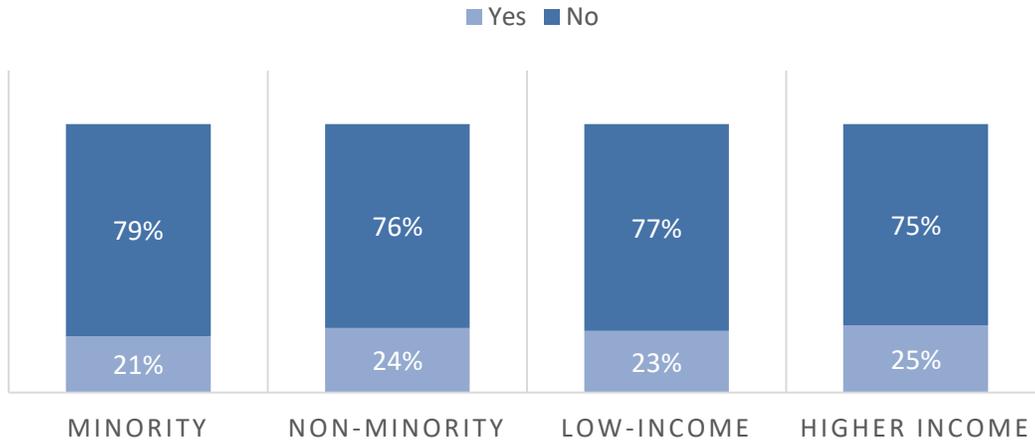


FIGURE V-12: CURRENT DRIVER'S LICENSE BY RACE/ETHNICITY AND INCOME

### 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?"

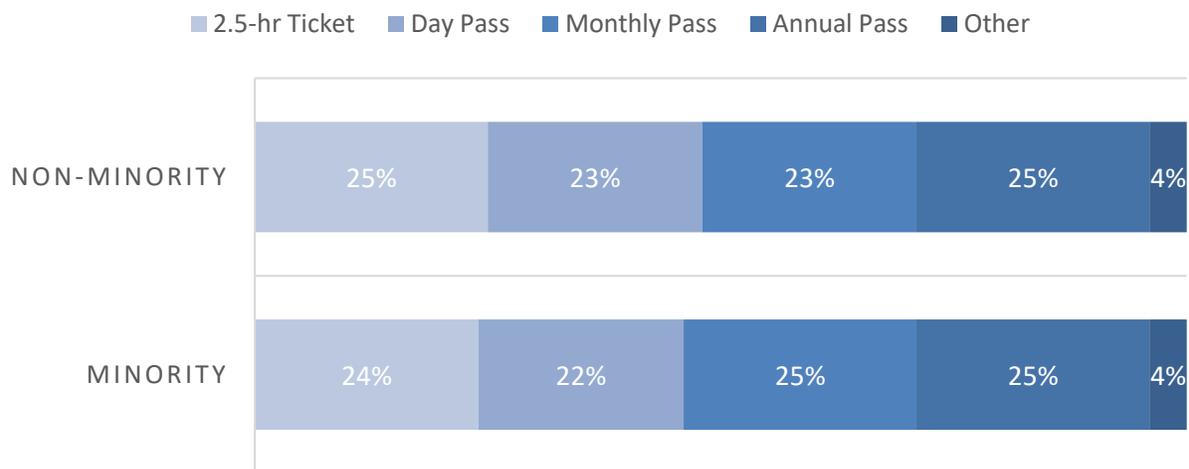
## PAY FOR TRIP USING HOP? 2018 FARE SURVEY



**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?

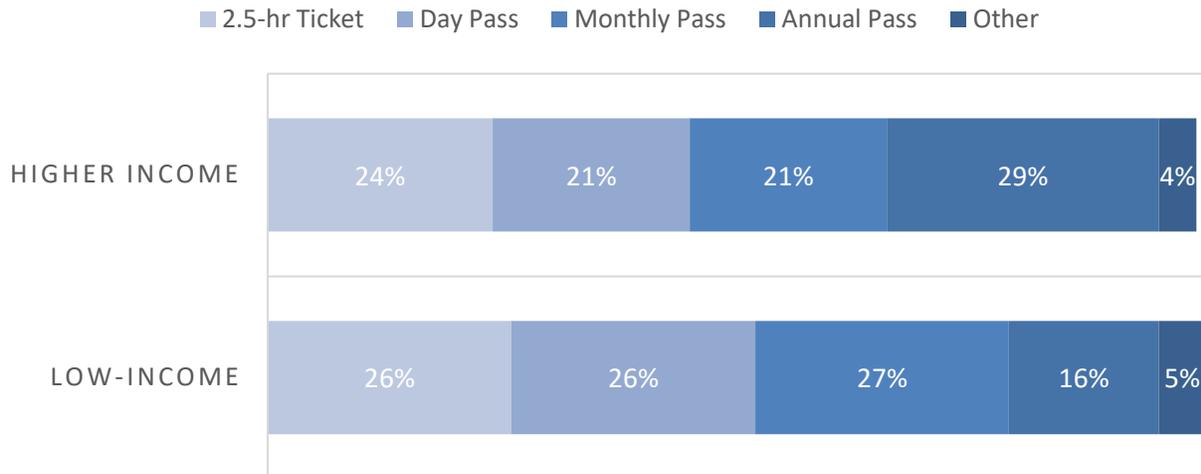


**FIGURE V-14: FARE PAYMENT TYPE BY RACE/ETHNICITY**

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

fares are more likely to be paid using a monthly pass or a Day Pass. While non-low-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.

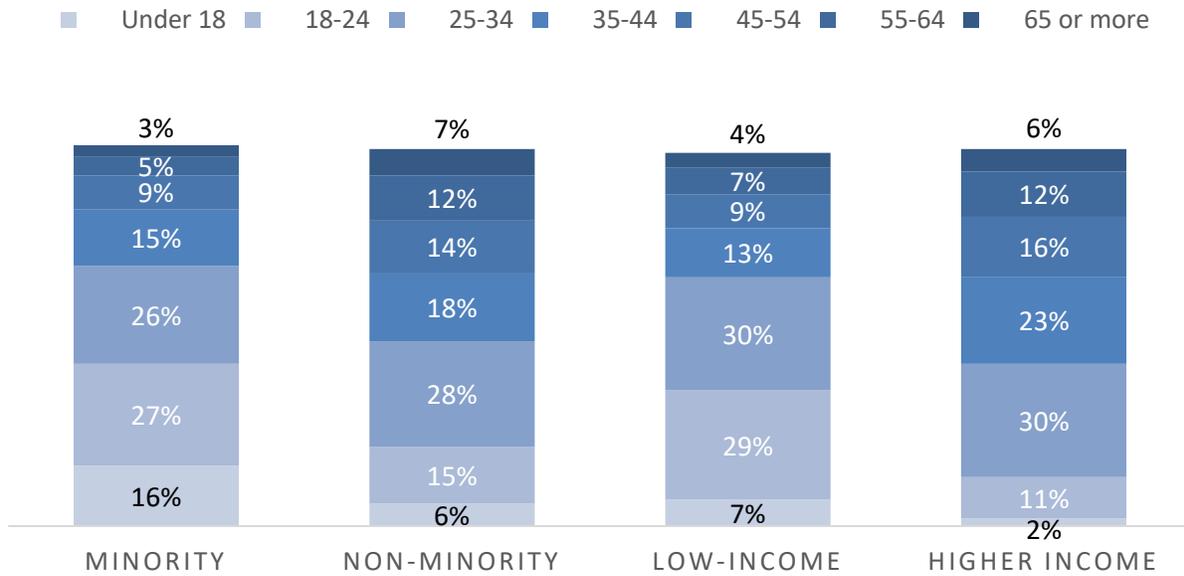
### Low-income vs. Non-low-income

1. Non-low-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 Non-low-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

Six maps (Figures V-17, V-18, V-19, V-20, V-21, and V-22) 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 recently<sup>8</sup> replaced, improved<sup>9</sup>, 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).

Figures V-17 through V-22 show Recent, In Progress, and Planned Facilities organized by facility type. The improvements shown include the following:

### Recently Completed

- Three storage and maintenance facility improvements
- Four battery electric buses
- One high capacity bus corridor
- Three MAX light rail station improvements
- 36 major bus stop improvements
- Two elevator refurbishments
- 240 Digital Display Additions

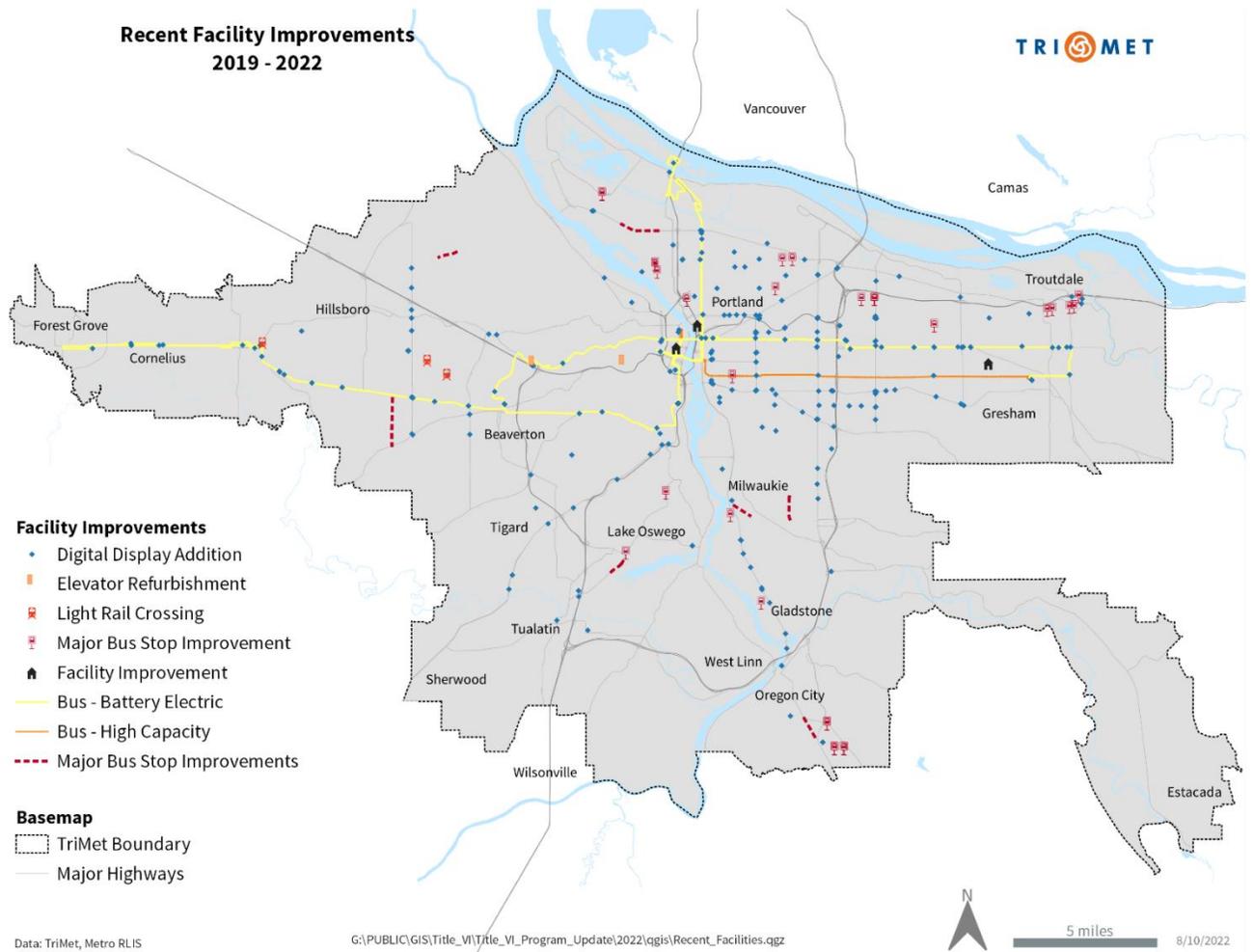
### In Progress and Planned

- One Park & Ride improvement
- Four storage and maintenance facility improvements
- Four transit center improvements
- Two new high capacity bus corridors
- One new high capacity and electric bus corridor
- Six MAX light rail corridor/station improvements
- 20 major bus stop improvements

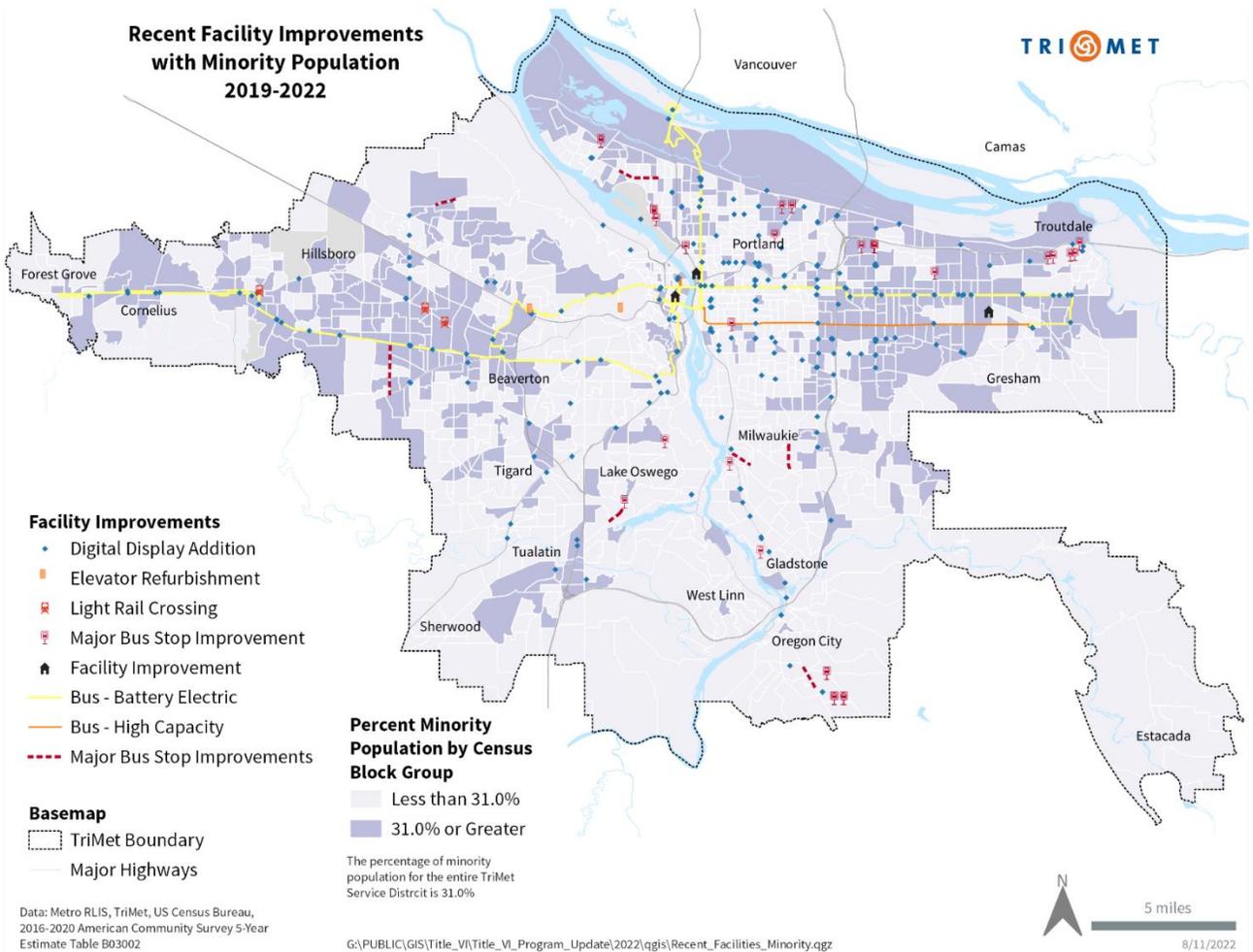
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<sup>8</sup> Recently means since the prior Title VI program submittal in 2019

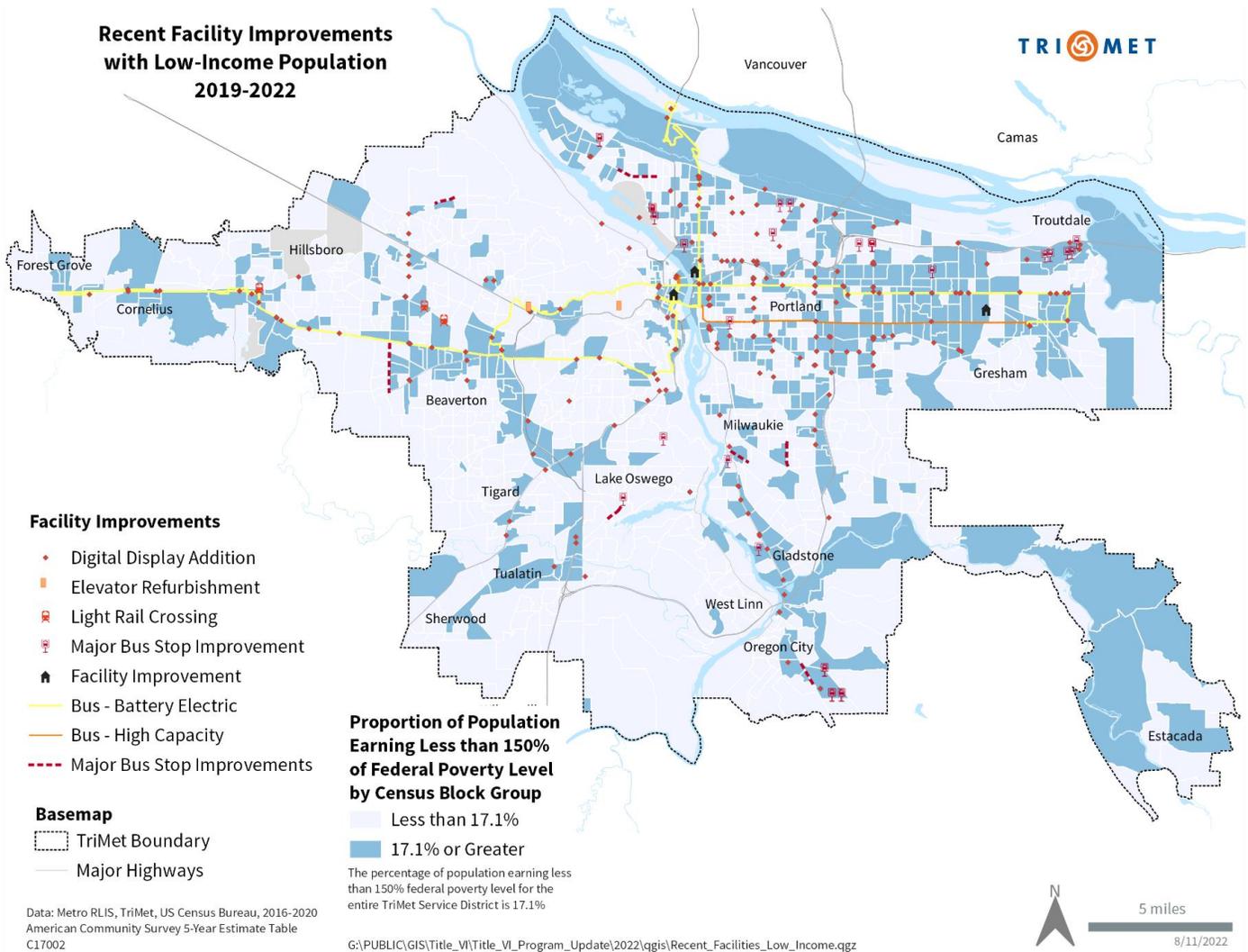
<sup>9</sup> Replacement and improvement excludes maintenance activities.



**FIGURE V-17: RECENT FACILITY IMPROVEMENTS**

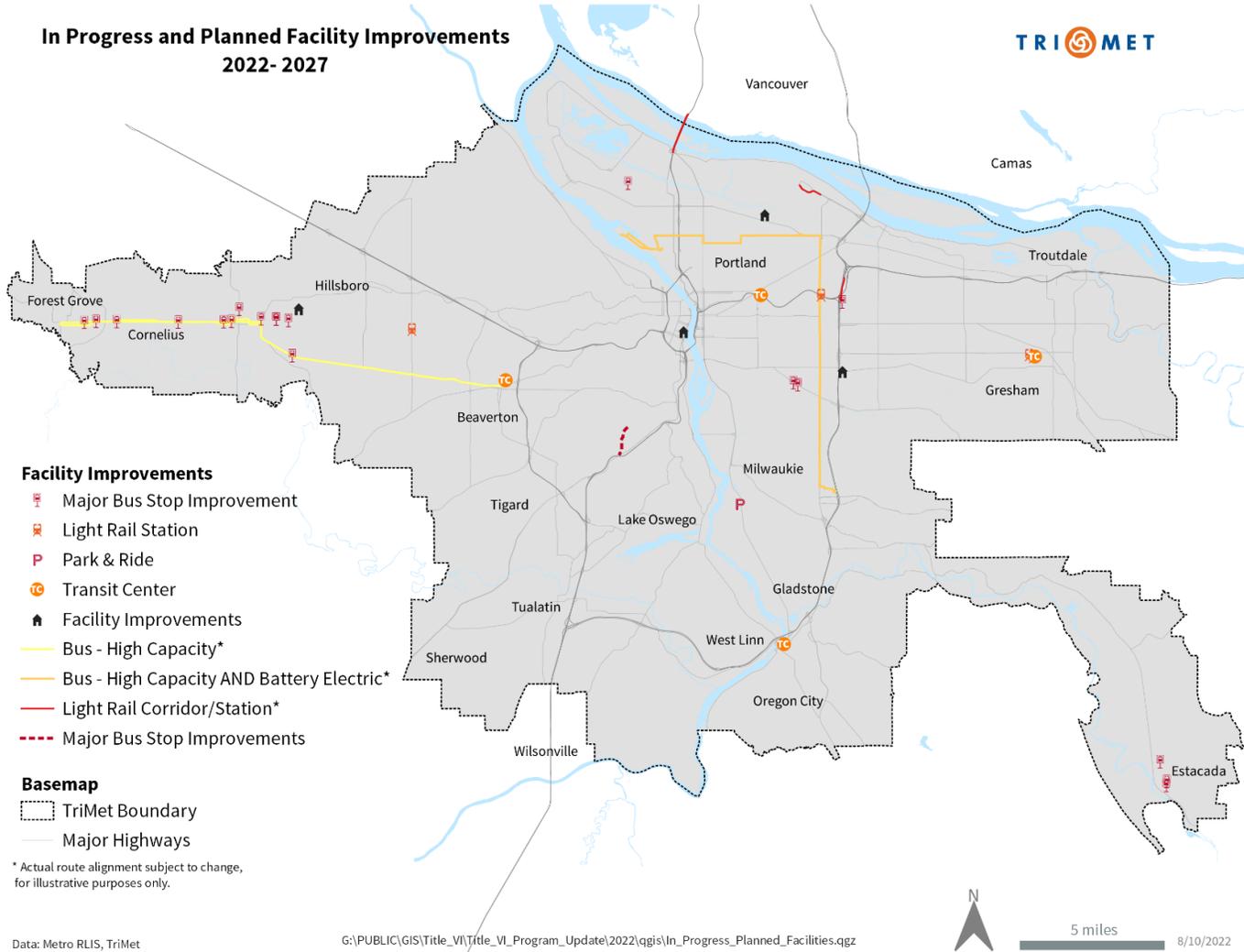


**FIGURE V-18: RECENT FACILITY IMPROVEMENTS WITH MINORITY POPULATION**



**FIGURE V-19: RECENT FACILITY IMPROVEMENTS WITH LOW-INCOME POPULATION**

**In Progress and Planned Facility Improvements  
2022- 2027**

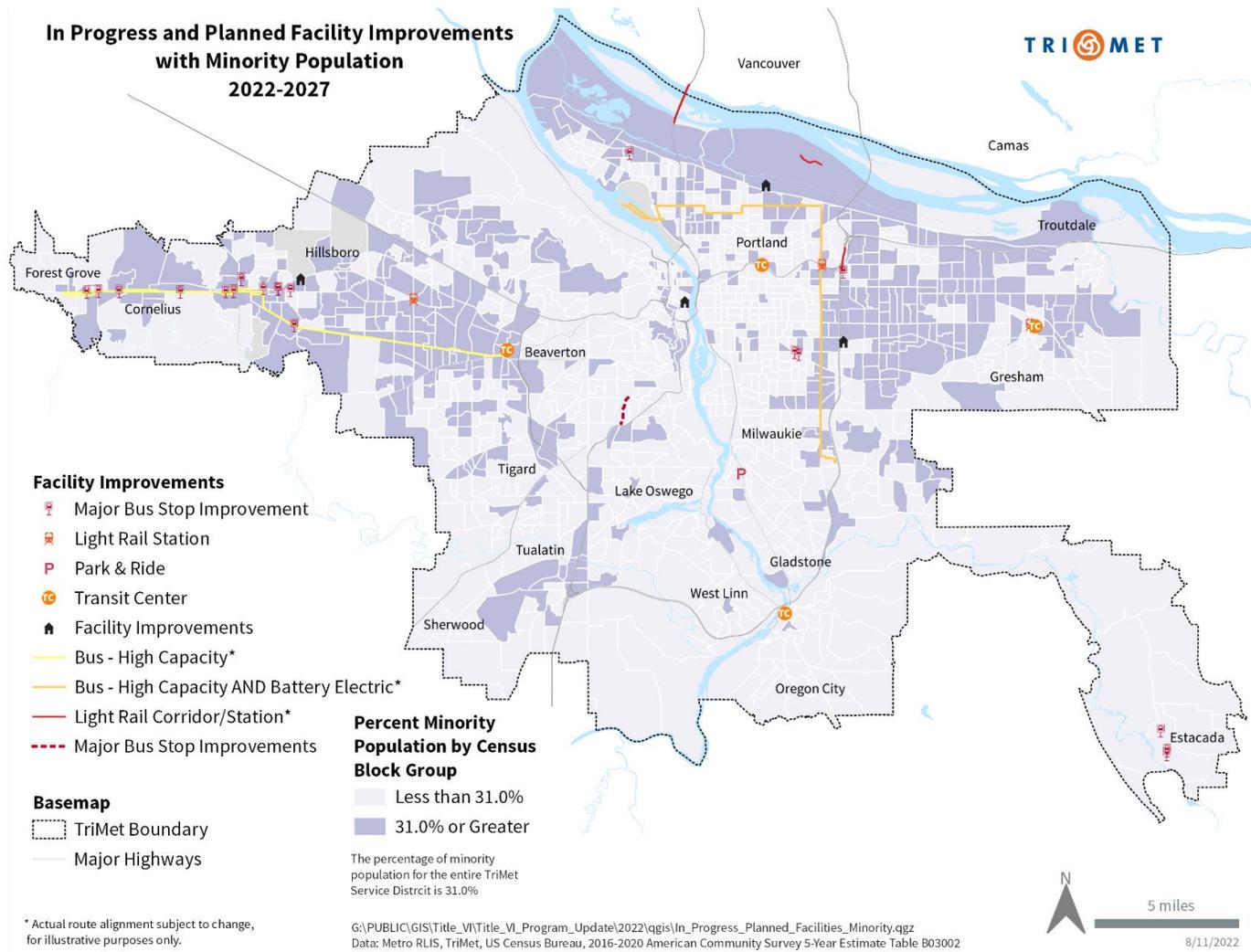


Data: Metro RLIS, TriMet

G:\PUBLIC\GIS\Title\_VI\Title\_VI\_Program\_Update\2022\qgis\In\_Progress\_Planned\_Facilities.qgz

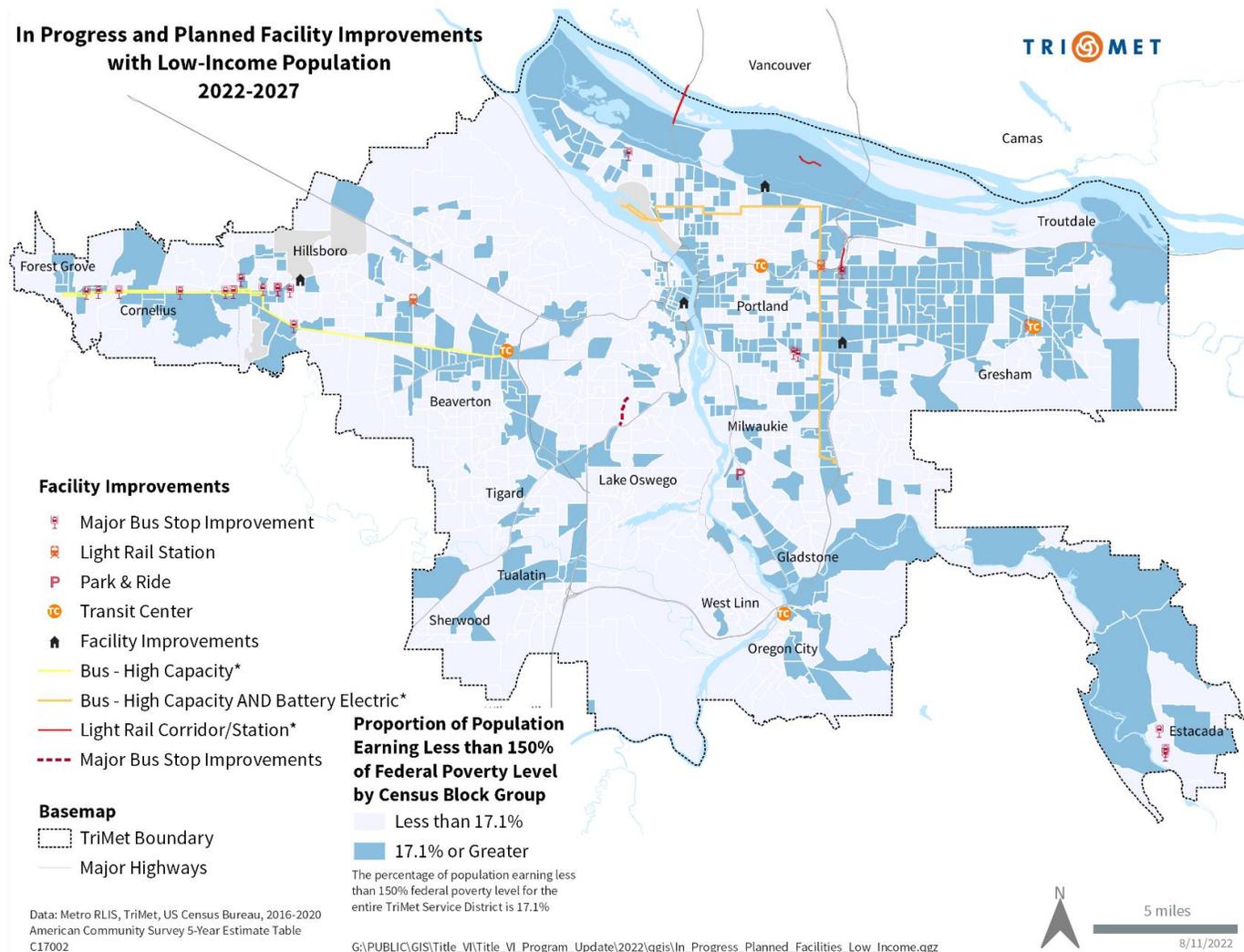


**FIGURE V-20: IN PROGRESS AND PLANNED FACILITY IMPROVEMENTS**



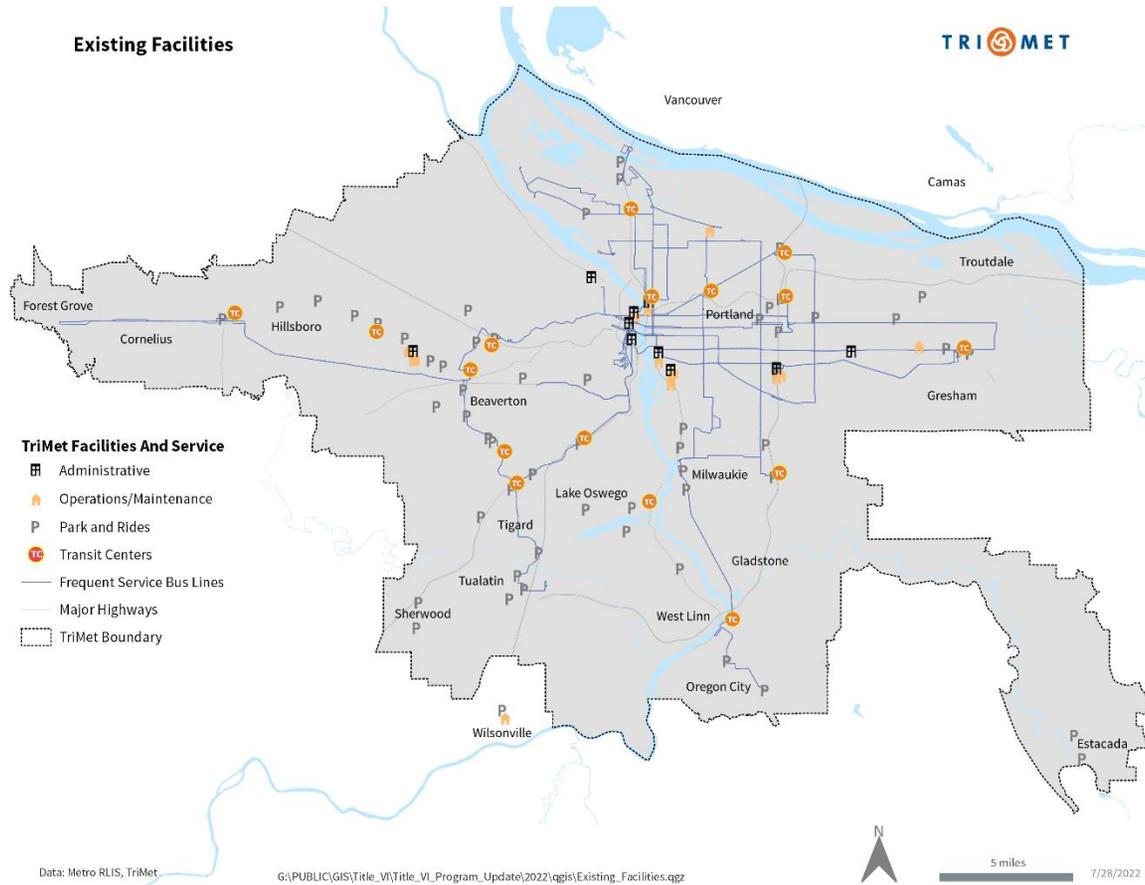
**FIGURE V-21: IN PROGRESS AND PLANNED FACILITY IMPROVEMENTS WITH MINORITY POPULATION**

### In Progress and Planned Facility Improvements with Low-Income Population 2022-2027



**FIGURE V-22: IN PROGRESS AND PLANNED FACILITY IMPROVEMENTS WITH LOW-INCOME POPULATION**

Figure V-23 shows the location of **Existing Facilities** in relation to Frequent Service lines (all five MAX light rail lines and 17 Frequent Service bus lines). Facilities are depicted by type: Administrative, operations/maintenance, Park & Ride, and transit centers.

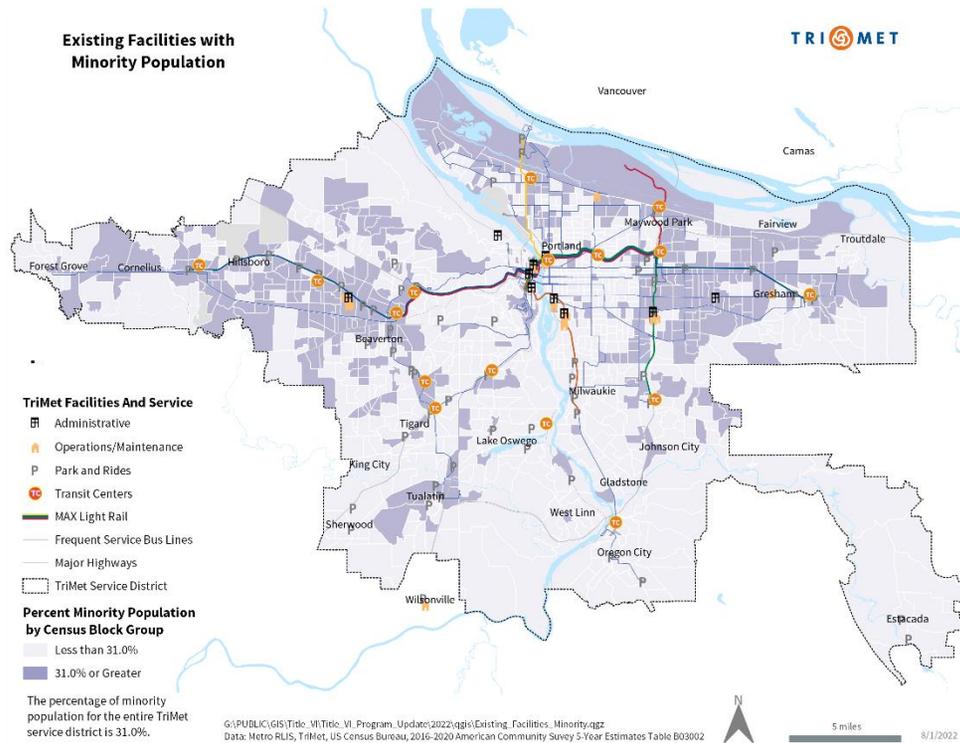


**FIGURE V-23: EXISTING FACILITIES**

Figure V-24 **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 (31.0 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.

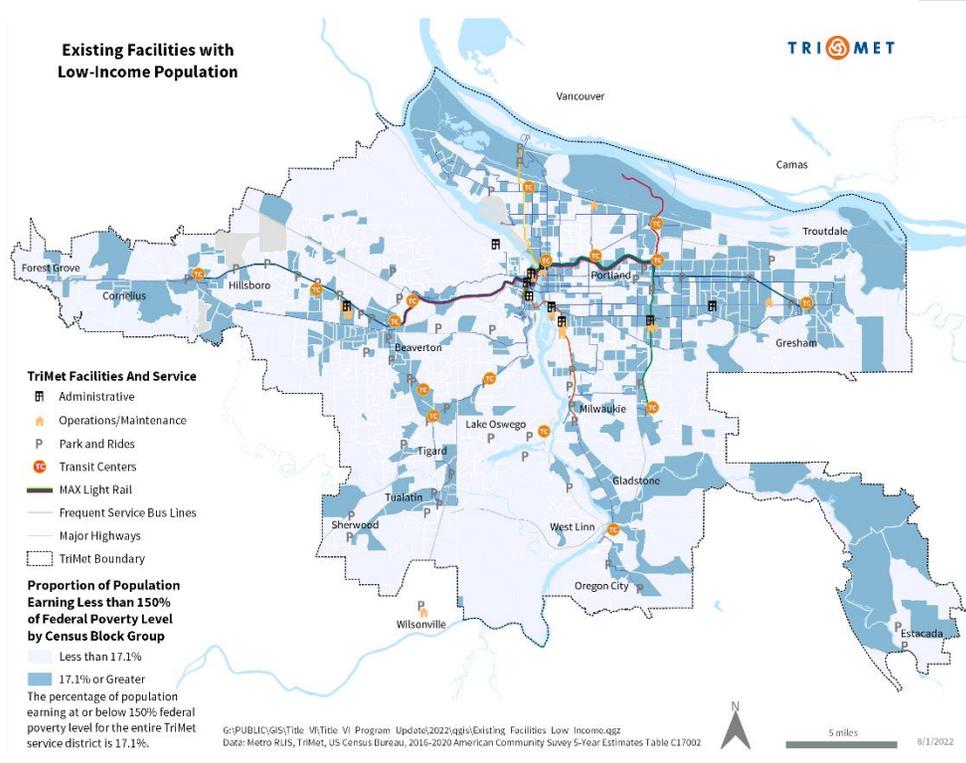
Transit Centers are dispersed throughout the service area and Park & Ride facilities are dispersed along major rail and bus service corridors and are typically five miles or more from the Portland City Center.



**FIGURE V-24: EXISTING FACILITIES WITH MINORITY POPULATION**

Figure V-25 **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 (17.1% 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.

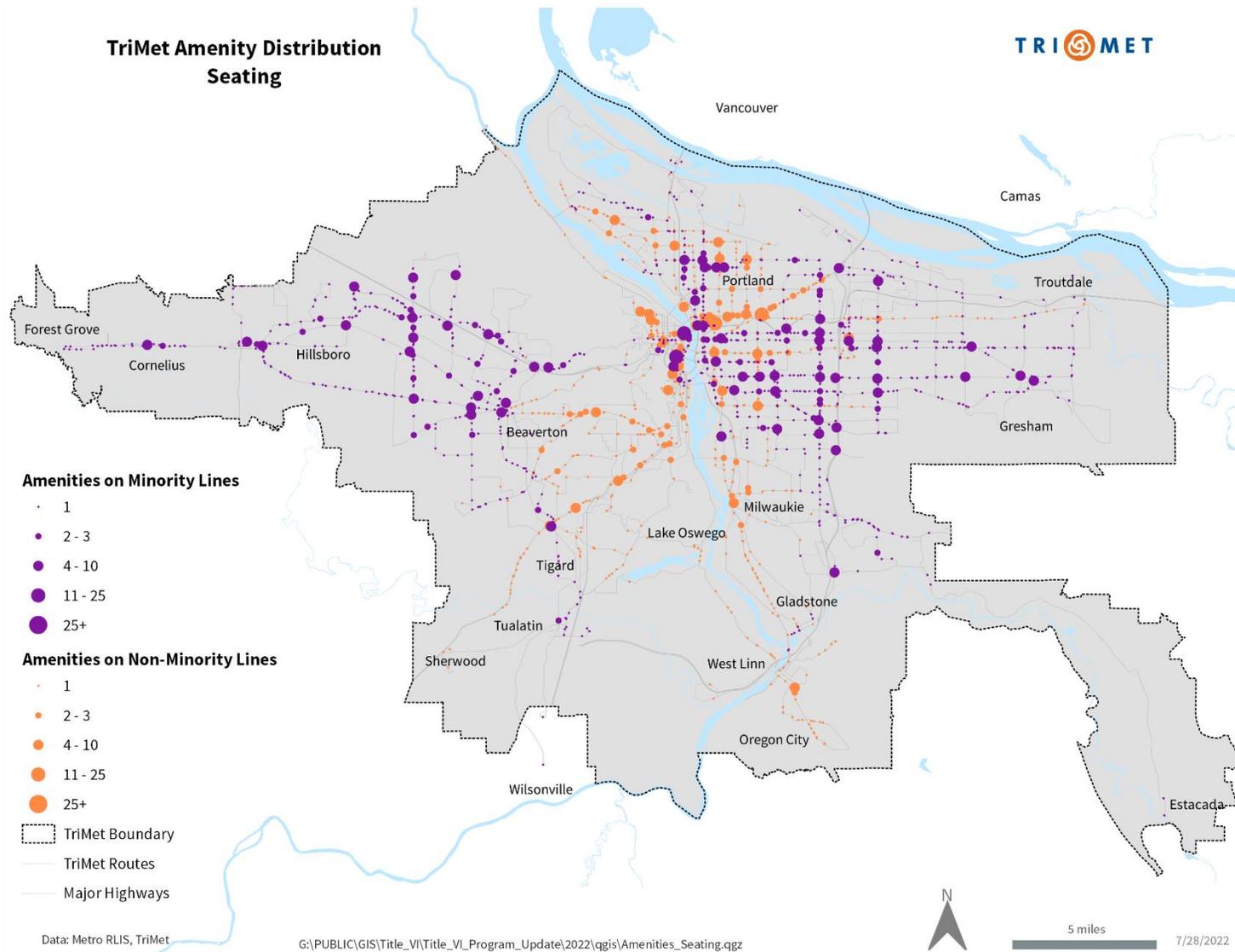
**FIGURE V-25: EXISTING FACILITIES WITH LOW-INCOME POPULATION**

## AMENITIES

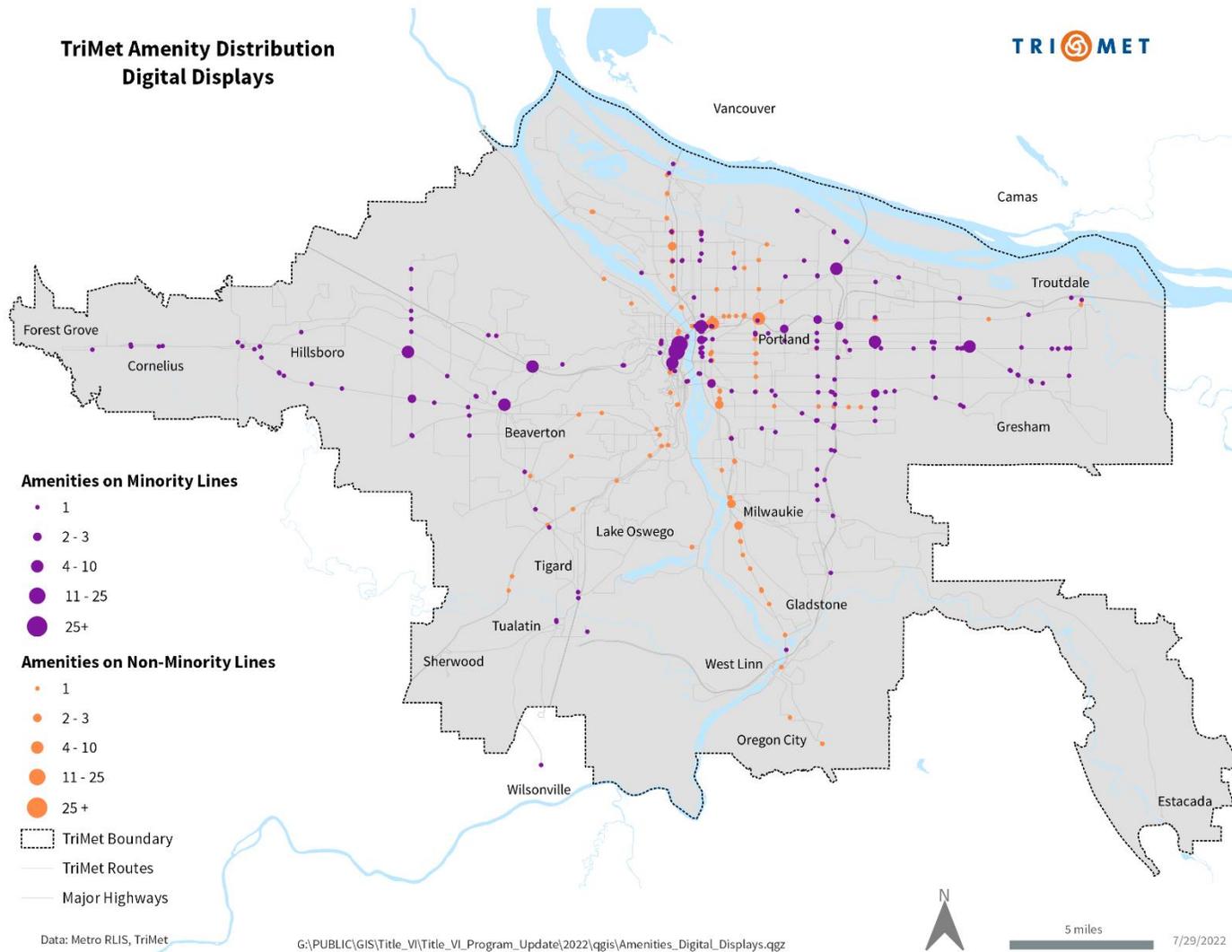
Maps of amenities by type and location on minority and on non-minority transit routes that follow illustrate the distribution of amenities overlaid on Census block groups with above-average concentration of minority population:

- Figure V-26 Amenity Distribution: Seating
- Figure V-27 Amenity Distribution: Digital Displays
- Figure V-28 Amenity Distribution: Elevators
- Figure V-29 Amenity Distribution: Shelters
- Figure V-30 Amenity Distribution: Signs, Maps, and/or Schedules
- Figure V-31 Amenity Distribution: Waste Receptacles

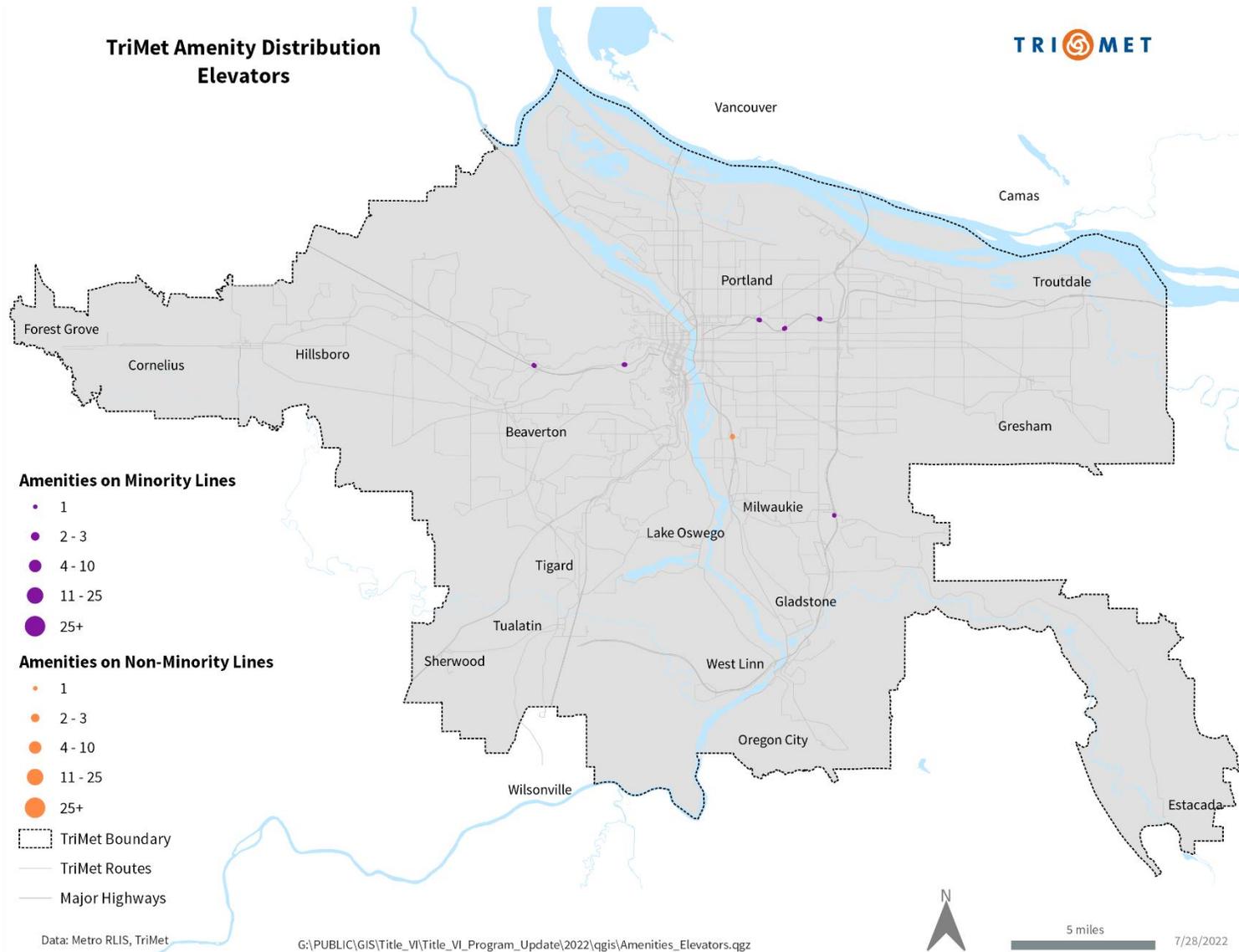
Due to the scale of the maps presented below, the large number of amenities, and many items' proximity to each other, these features were aggregated for display. To improve the interpretability of features, groups of like-amenities within 750 feet of each other were aggregated and the center of each 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 routes as well as low-income and non-low income lines.



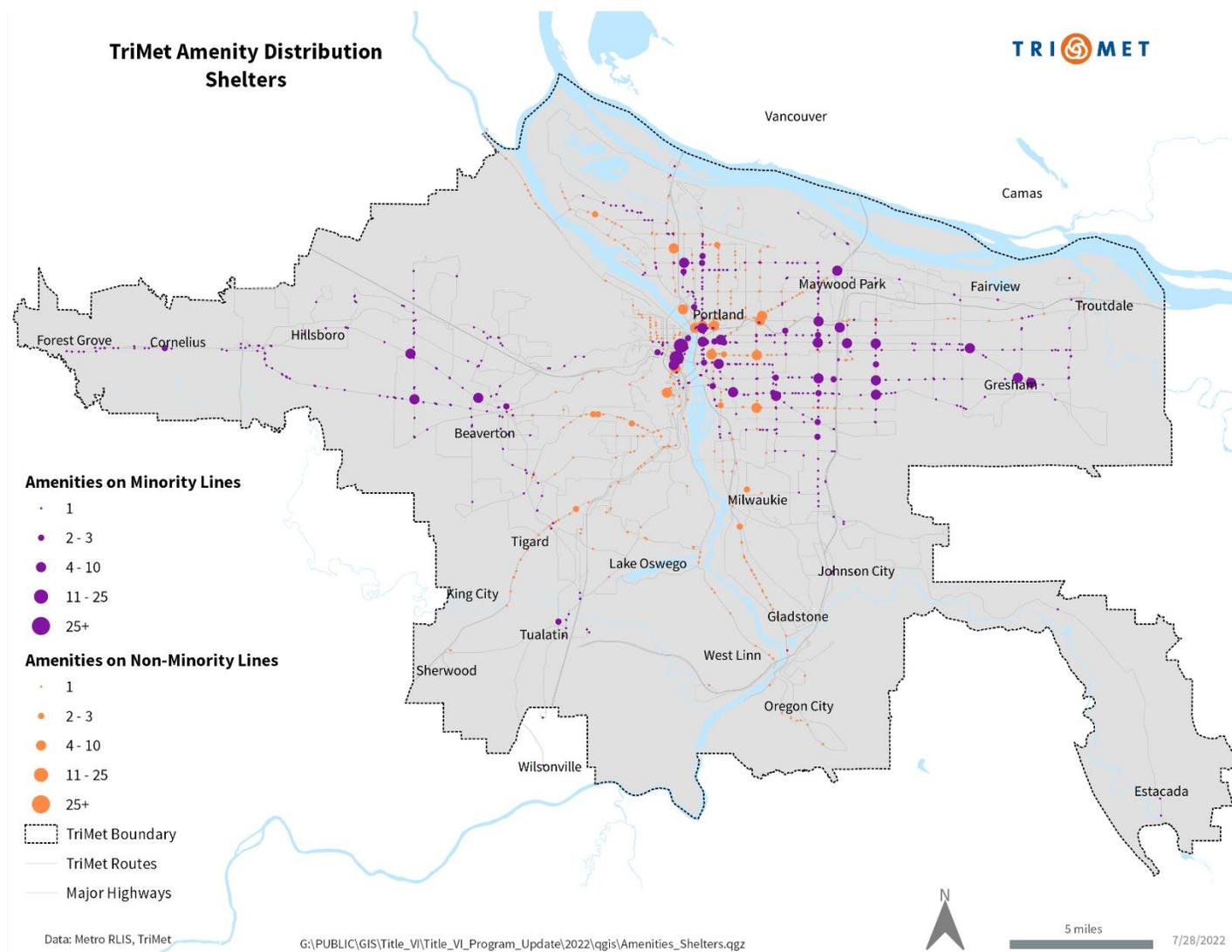
**FIGURE V-26 AMENITY DISTRIBUTION: SEATING**



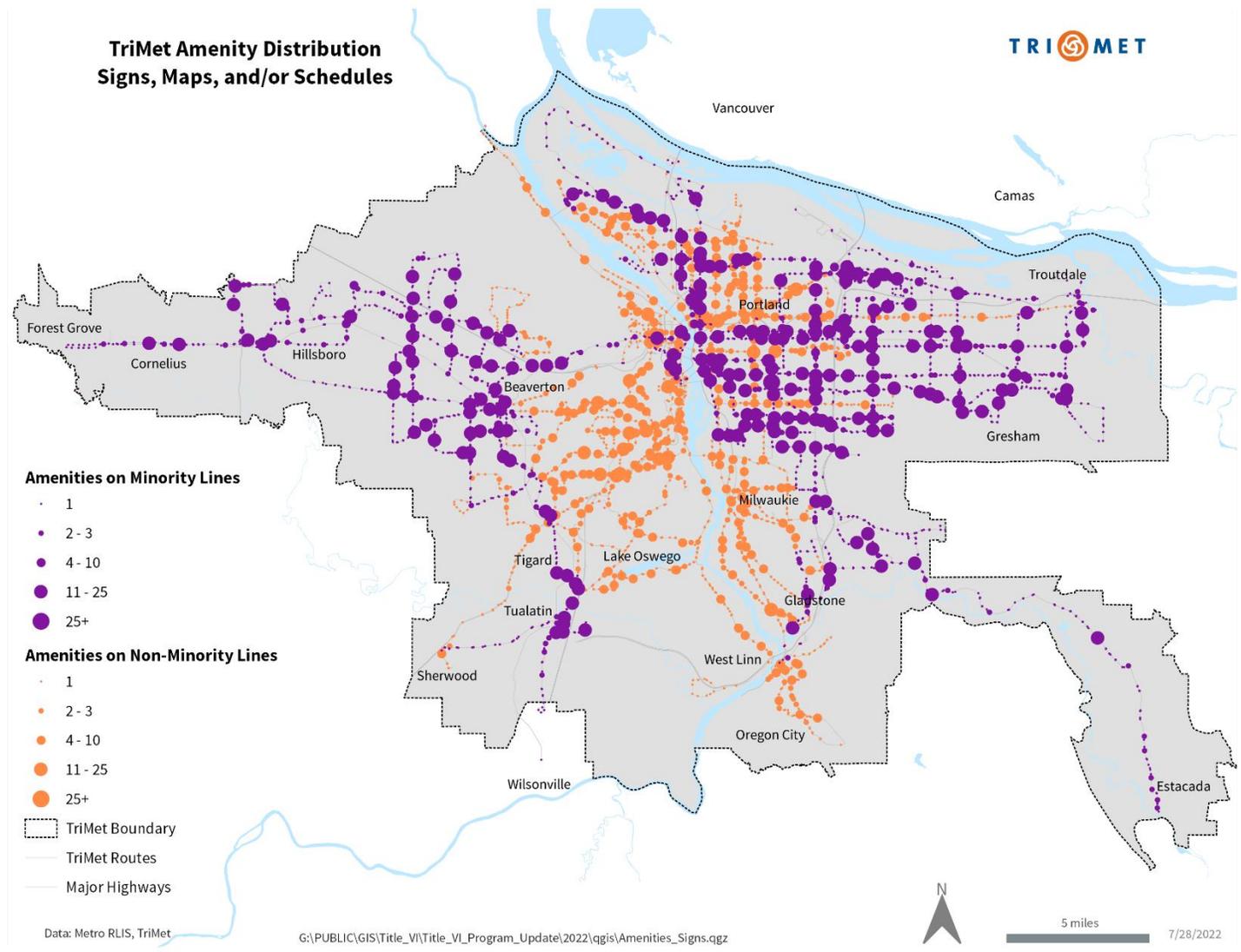
**FIGURE V-27 AMENITY DISTRIBUTION: DIGITAL DISPLAYS**



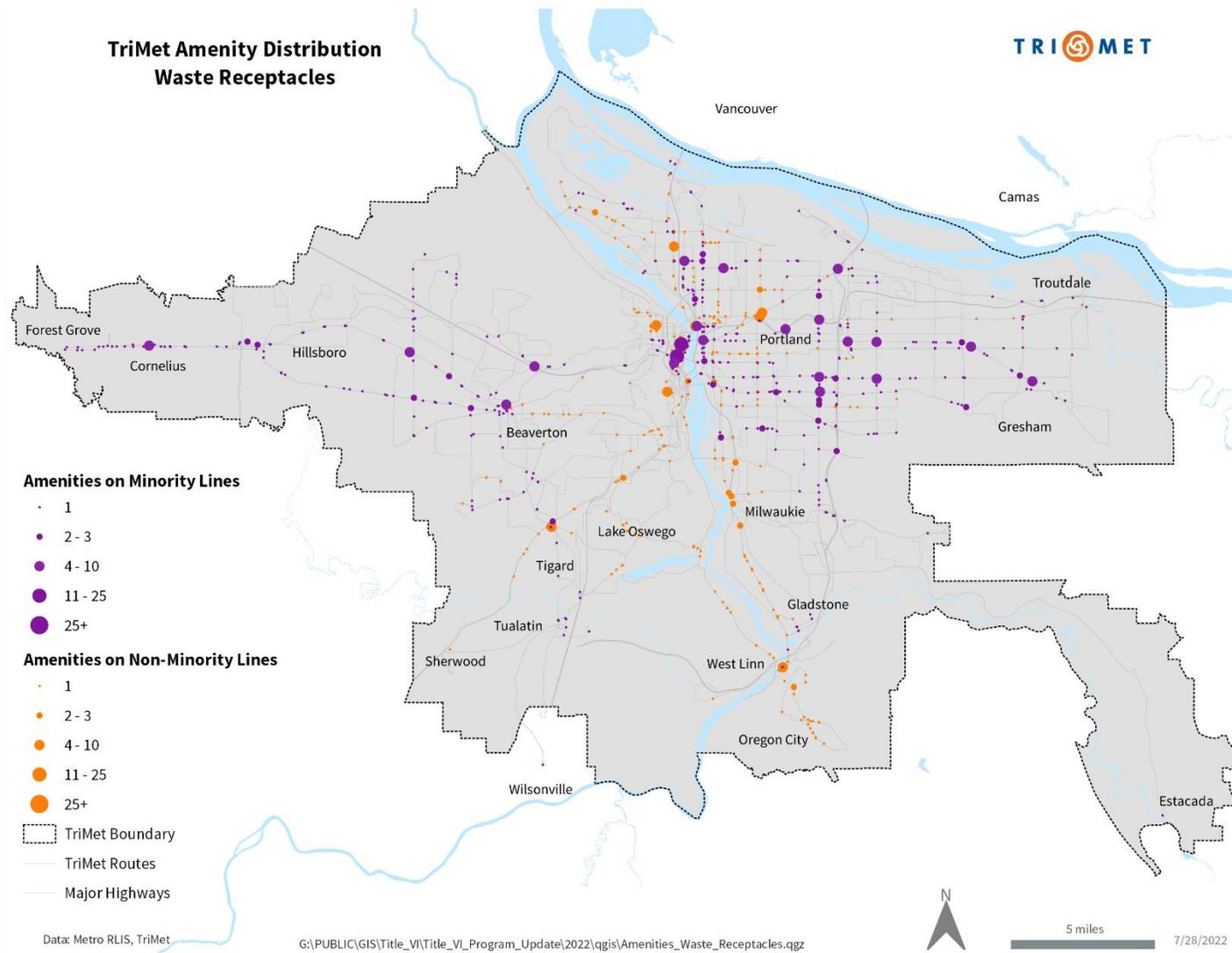
**FIGURE V-28 AMENITY DISTRIBUTION: ELEVATORS**



**FIGURE V-29 AMENITY DISTRIBUTION: SHELTERS**



**FIGURE V-30 AMENITY DISTRIBUTION: SIGNS, MAPS, AND/OR SCHEDULES**



**FIGURE V-31 AMENITY DISTRIBUTION: WASTE RECEPTACLES**

# Attachments

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- A: TriMet Board Resolution 22-09-XX 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
- G: Subrecipient's Title VI Compliance Template
- H: FY2021 Annual Service Plan Equity Analysis, with Documentation of Board Approval
- I: FY2022 Annual Service Plan Equity Analysis, with Documentation of Board Approval
- J: FY2023 Annual Service Plan Equity Analysis, with Documentation of Board Approval
- K: TriMet Service Guidelines Policy
- L: Data from 2018 On-board Fare Survey
- M: 2022 Title VI Program Update Outreach Materials