



2016 Title VI Program Update



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

Dear Reader,

Transit has been at the forefront of one of the most important revolutions of our country's history – the push for civil rights.

From the opposition to segregated rail cars in the late 19th Century to Rosa Parks refusing to give up her seat on the bus and sparking the 1955 Montgomery Bus Boycott, the fight against discrimination and segregation has been a fight for equal access to services and opportunity.

That such key events in the push for civil rights occurred on a bus and a train reminds us that transit is not only a connection to destinations, but to opportunity. People of color and those with low-income are more often transit dependent than others. That's why we're dedicated to do all we can to make our transit system a place where we all can ride without experiencing discrimination. It's equally as important to help those individuals move out of poverty and in to prosperity by connecting to jobs, schools and other community services.

Our Title VI policies are meant to ensure that we pay close attention to the impacts on minority and low-income riders when we make decisions about service and the cost of fares. During economic downturns in the past, we've had to make tough choices about reducing bus and MAX service and raising fares. Likewise, in more prosperous times (such as now) we aim to improve service in such a way that minority and low-income riders experience the benefits that come from improvements.

Our region is growing in both population and diversity. Part of embracing this growing diversity means that we provide service equitably, and Title VI is one way we ensure that we deliver.

We proudly use equity as a lens to help guide our decisions on growing our system that benefit all, but especially those who are transit dependent.

Welcome aboard, everyone!

Neil McFarlane
TriMet General Manager



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Introduction

WHAT IS TITLE VI?

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

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

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

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

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

- Deny program services, aids, or benefits;
- Provide a different service, aid, or benefit, or provide them in a manner different than they are provided to others; or

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

- Segregate or separately treat individuals in any matter related to the receipt of any service, aid, or benefit.

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 2,800 union and non-union employees.

WHAT DOES THIS MEAN FOR TRIMET?

The policies, 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.

TriMet’s Director of Diversity and Transit Equity is chiefly responsible for administering and monitoring Title VI requirements, but it is the duty of every employee, vendor and contractor of the agency to ensure compliance with nondiscrimination and to further civil rights protections. The TriMet Board of Directors must also approve the agency’s Title VI program prior to its submittal to FTA.

TRIMET’S COMMITMENT TO EQUITY

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

In partnership with our Transit Equity Advisory Committee we continue to look for areas across the agency to improve our overall equity strategy. Continuing to invest

in transit equitably and embracing an inclusive model where equity is a core business objective is critical to TriMet.

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

DEFINITIONS

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

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

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

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

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

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

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

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

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

Low-Income Person – For the purposes of Title VI, TriMet defines low-income 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. *[Note: this does not preclude TriMet from applying a higher threshold (e.g. 185 percent or 200 percent of the HHS poverty guidelines) when determining eligibility for income-based programs or services.]*

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.

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.

Public Transportation – Regular, continuing shared-ride surface transportation services that are open to the general public or open to a segment of the general public defined by age, disability, or low-income. Public transportation includes buses, subways, light rail, commuter rail, monorail, passenger ferry boats, trolleys, inclined railways, people movers, and vans. Public transportation does not include Amtrak, intercity bus service, charter bus service, school bus service, sightseeing service, courtesy shuttle service for patrons of one or more specific establishments, or intra-terminal or intra-facility shuttle services. Public transportation can be either fixed route or demand response service.

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

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

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

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

Transit Equity – TriMet defines Transit Equity as:

- Policies that promote the equitable distribution of burdens and benefits

- Promoting equal access to resources and services
- Engaging transit-dependent riders in meaningful planning and decision-making processes

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

Part I: General Requirements

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

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

1. Title VI Public Notice
2. Title VI Complaint Procedures
3. List of Title VI Investigations, Complaints, and Lawsuits
4. Public Participation Plan
5. Language Assistance Plan
6. Board Membership and Recruitment
7. Subrecipient Monitoring
8. Facilities Siting and Construction
9. Equity Analyses of major service and fare changes implanted since the previous Title VI program submission in 2013

TITLE VI NOTICE AND COMPLAINT PROCEDURES

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

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

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

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

"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."

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.

From the Title VI Circular

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

Making a Title VI Complaint

Any person who believes he or she has been aggrieved by an unlawful discriminatory practice under Title VI may file a complaint with TriMet. Any such complaint must be in writing 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

TriMet Director, Diversity and Transit Equity
1800 SW 1st Avenue, Suite 300
Portland, OR 97201

Phone: 503-962-2217

Fax: 503-962-6469

Email us

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

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

From the Title VI Circular

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

TriMet’s Title VI complaint procedures are as follows:

Title VI Complaint Procedure

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 Title VI Complaint Form.

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 reconsideration review.

TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

From the Title VI Circular

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

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

Investigations

There were no Title VI investigations during the reporting period.

Lawsuits

No Title VI lawsuits were filed. One lawsuit previously reported in TriMet’s 2013 Title VI Program alleging race discrimination, was dismissed by the 9th Circuit Court of Appeals (*Calbruce Green v. TriMet*, filed July 21, 2011, dismissed, dismissal affirmed on appeal July 8, 2014).

Complaints

Complaints submitted to TriMet were received, investigated and resolved by TriMet staff. Table I-1 lists complaints received during the reporting period. The Action Taken/Findings category is designated in accordance with the following:

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

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

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

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

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

DATE FILED	SUMMARY	STATUS	ACTION TAKEN/FINDINGS
12/27/13	Complaint filed with FTA alleging that TriMet's transfer policy was not in compliance with FTA Title IV requirements.898	Closed	FTA issued decision letter on 7/17/14 closing the complaint finding that TriMet was not noncompliant with FTA's Title VI requirements, and that no corrective action was needed.
11/18/15	Title VI compliant filed with TriMet alleging poor customer service on a scheduled transportation service alleging discrimination possibly related to a disability.	Cleared	Contracted Lift service provider picked up riders at their home 20 minutes late due to a scheduling manifest error. The late pick up extended their normal travel time.
11/30/15	Title VI Compliant filed with TriMet Alleging Bus Operator did not stop based on race of customer	Cleared	Customer complaint describes them being behind or near a tree next to the stop. Operator reported not seeing the customer at the site. Reviewed operator's record and found no similar complaints.
2/3/2016	Title VI Complaint filed with TriMet Alleging Discrimination when passenger asked to exit vehicle at stop.	Inconclusive	Customer and Operator accounts overlapped and describe a communication error and poor customer service, no evidence of racial bias.

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 D) 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 Diversity and Transit Equity Department serves as a resource to other TriMet divisions to integrate these populations into TriMet's public involvement activities.

From the Title VI Circular

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

In proposing service or fare changes TriMet uses a variety of methods to communicate proposed changes 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, TriMet staff translates materials to ensure those riders 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 2013 Title VI Program submission. The summary spans from September 2013 to June 2016. During this period TriMet conducted outreach for:

- Service Enhancement Plans (SEPs)

- MAX Orange Line and associated bus service changes
- Other service and fare changes
- Construction projects
- TriMet Bike Plan

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.*

Service Enhancement Plans (SEPs)

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

TriMet began the SEP outreach process by identifying substantial concentrations of **communities of color and LEP communities** within each subarea of the TriMet district. Table I-2 displays the substantial concentrations of minority and LEP populations within each subarea.

Public outreach materials for the SEPs were translated into the languages that were substantially represented in each subarea. Outreach activities targeted to communities of color and LEP communities included:

- Culturally-specific focus groups held in languages other than English when appropriate
- Coordination with community-based organizations and schools to distribute translated materials and solicit feedback

- Attendance at culturally-specific events

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

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

Outreach efforts to **low-income communities** during development of the SEPs included:

- Direct outreach to clients of social service agencies, such as affordable housing providers and medical clinics that focus on low-income patients
- Direct outreach to Title I schools and early education programs
- Direct mailings to residences in low-income areas
- Focus groups to residents in low-income areas
- In-person outreach at bus stops and rail stations in low-income areas
- Attendance at community events and meetings
- Direct outreach to employers

MAX Orange Line & Associated Bus Service Changes

In September 2015, TriMet opened the **MAX Orange Line** that runs between Downtown Portland and Milwaukie. Marketing and outreach for the opening of the light rail line focused on both safety and service. The Safety Outreach Campaign included newspaper inserts in English and Spanish, thousands of postcard mailings, fact sheets, school “backpack stuffers,” temporary tattoos with safety messaging, guided safety rides for students, advertisements, social media messaging, and Safety Ambassador presence at crossings. To advertise the new service, the “Catch the Orange” campaign included advertisements in community and culturally-specific newspapers, TriMet vehicles, and various other channels. Opening day celebrations

included members of the Grand Ronde tribe leading the first train across the new Tilikum Crossing bridge and holding a Native American potlatch on the riverbank just south of the bridge.

With this opening, TriMet made several **bus service changes** to complement the new light rail service and reduce service redundancies. Community engagement about potential bus service changes began in early 2014. This initial effort described service assumptions from the light rail project's Final Environmental Impact Statement and asked riders what they thought should happen in terms of bus service. Outreach methods included:

- Fact sheets in English and Spanish
- A web page
- Direct mail to addresses within the corridor
- Emails
- Social media
- In-person open houses
- Presentations at community meetings
- On-street outreach at key bus stops

Based on feedback from this effort, planners developed an initial service proposal, including a map. During summer 2014, TriMet sought riders' feedback on this initial proposal through an online survey that included an incentive (drawing to win transit tickets). The survey asked riders to rate the overall proposal and specific elements, and invited open-ended comments. The proposal and survey were promoted with the same methods from the earlier phase, as well as a brochure (English and Spanish) that was distributed on-board relevant bus lines and at key stops. Notices were also posted at all bus stops that would be closed under the proposal, and letters were mailed to properties on streets with new bus traffic proposed.

Again, planners reviewed the feedback received, and refined the service proposal. During fall 2014, TriMet shared a final proposal and asked riders for open-ended comments. Methods included emails, social media, presentations at community meetings and a new brochure (English and Spanish) distributed on-board and at key stops. In early 2015, staff reviewed these comments, conducted the Title VI equity analysis (Attachment K), and finalized the service plan.

In spring 2015, TriMet's Board of Directors held a public hearing and adopted the service plan. During summer 2015, TriMet performed extensive marketing of the service changes, including direct mail to households in the MAX Orange Line corridor that included two all-day transit passes.

Other Service & Fare Changes

In 2013 TriMet began restoring service by adding trips to bus lines where they were most badly needed and implemented some key elements of the Westside Service Enhancement plan, which was completed in September 2013.

- September 2013 service changes included increased frequency and route changes to several bus lines that serve major and growing employers on the west side of the TriMet service district.
- Adjustments to some bus lines that received large service cuts in 2012.
- Creation of a new bus line on the Westside adding frequency of service between the cities of Sherwood and Tigard.

Outreach on these projects included open houses and public hearings from 2012-2013 and implementation in September 2013. TriMet posted ads in community and neighborhood publications and publications of broad circulation. Ads were targeted to communities of color and LEP communities. TriMet also leveraged a strong social media following using posts on Facebook, Twitter, and media releases. Mailings were sent to the impacted service areas announcing the public participation process and the implementation dates. Email lists were also leveraged to communicate with riders and stakeholders interested in service enhancements. TriMet Customer Service conducted on-board outreach using alerts in English and Spanish to communicate the public participation process as well as the final changes prior to implementation.

In 2013 TriMet launched its **Mobile Ticketing app** with a party at the Portland State University Urban Plaza. Extensive outreach promoting the advantages of a paperless fare used email, print ads, social media and stakeholder lists to promote the product and the event to youth, communities of color, minority populations, seniors, and people with disabilities.

TriMet raised the price of **Honored Citizen fares**, which provide a discounted fare for seniors and people with disabilities, in September 2015. Historically, Honored Citizen fares had been set at half the regular adult fare. While regular adult fares have increased over the past several years, the Honored Citizen fare price had not changed since 2010. TriMet conducted a fare equity analysis in March 2015 garnering feedback via a TriMet hosted stakeholder roundtable discussion with representatives of organizations serving older adults and people with disabilities. The fare increase proposal was also reviewed by TriMet's Transit Equity Advisory Committee (TEAC) and the Committee on Accessible Transportation (CAT). A point of focus for TEAC was outreach to communities of color, due to the findings of the equity analysis that people of color are under-represented amongst Honored Citizens. TriMet conducted several listening sessions at senior centers, health centers, cultural centers, and community centers where our key audiences congregate. The meetings were widely promoted in multiple languages via email, print ads and social media.

TriMet conducted outreach to social service agencies that sell Honored Citizen fares to help expand the number of locations where these fares can be purchased.

Title VI fare equity analysis for TriMet's upcoming **Hop Fastpass electronic fare system** entailed partnering with culturally-specific community-based organizations to gather feedback on proposed policies associated with the system. TriMet spoke with low-income, minority, and LEP riders throughout the service district to better understand potential impacts of proposed changes, and to develop mitigation strategies where appropriate.

Finally, in early 2016 TriMet hosted an open house for the **Annual Service Change** which included many service enhancements developed through the SEP process, some of which involved route changes. TriMet sent letters to the areas where stops would close and also where weekend service would be added.

Construction Projects

In March 2015 TriMet launched a construction project to install the necessary infrastructure to support the **Hop Fastpass electronic fare system** that is scheduled to launch in 2017. Staff sent mailings in multiple languages to employers in the project areas, placed advertisements in newspapers of general circulation, met with community and business associations were addressed, and used social media to get the word out about construction zones, service impacts and temporary station closures.

TriMet also conducted extensive outreach for several construction projects at MAX stations to improve safety, extend station longevity and update appearance. Nearby mixed-use development impacted the **Orenco/NW 231st** station, requiring closure of access points and temporary stops in the surrounding neighborhood. Staff conducted outreach in Spanish & English at the station, on-board buses and trains that served the station, and to neighbors. At the opposite end of the service district, the **Blue Line State of Good Repair** project focused on aesthetic and safety improvements at or near aging MAX stations. TriMet send stakeholder emails and neighborhood mailings in multiple languages to inform impacted communities of the project.

In May 2016, TriMet launched a series of four construction projects designed to improve MAX performance via repairs to aging rail and switch equipment on its original light rail alignment built in 1986. The **1st Ave MAX Improvements** project shut down nine MAX stations for two weeks, closed some Downtown streets and disrupted light rail service. The outreach effort for this project was extensive, including newspaper and online ads in multiple languages, presentations to business and cultural groups, numerous media releases, on-board outreach using Spanish & English service alerts, and a mailing to over 20,000 addresses in the project area.

TriMet Bike Plan

In the fall of 2015, TriMet embarked on a series of open houses done in two phases for the **Bike Plan**. The plan is a roadmap that will help guide future investments in

biking infrastructure and amenities that improve bike access to transit stops, expand bike parking options and makes further accommodation for bikes on board trains and buses. In the fall, a series of five open houses were hosted by TriMet at locations in target areas and promoted via stakeholder lists and social media. The second round of five open houses was conducted in the spring of 2016 and promoted more widely using online and newspaper ads in Spanish and English, social media and stakeholder emails.

Title VI Program Update

TriMet utilized a variety of strategies to engage the community as part of the 2016 Title VI Program Update. The box on the next page provides a summary of activities; how the results of this outreach shaped TriMet's Major Service Change, Disparate Impact, and Disproportionate Burden policies and thresholds is described in Part II: Title VI Policies.

Outreach to inform this Title VI Program Update

- Community Forums on Transit, Civil Rights, & Equity
TriMet partnered with the Immigrant & Refugee Community Organization (IRCO), Northwest Family Services, and OPAL Environmental Justice Oregon to hold three community meetings from April to June 2016. In total about 50 community members attended the meetings, where TriMet staff presented current Title VI policies and solicited feedback through small-group discussions, with guiding questions on said policies as well as broader transit equity issues. In addition to providing a stipend to these organizations, TriMet paid for food, childcare, and language interpretation, and provided free books of TriMet tickets to participants. Outreach materials are provided for reference in Attachment Q.

- Community service provider survey
TriMet also sent a questionnaire to staff at the 96 organizations participating in the agency's Access Transit fare program for low-income transit riders (see Attachment Q). The questionnaire asked about organizational definitions of low-income, observations of changes to service or fares that have had a significant impact on clients served, and examples of evaluating policies or programs for potential disproportionate impacts to low-income persons and/or persons of color. TriMet received a total of 31 responses to the questionnaire.

- Dedicated web page and email blast
Once the draft Major Service Change, Disparate Impact, and Disproportionate Burden policies were developed, TriMet created a special webpage on trimet.org including a summary of the proposed policies, the full draft 2016 Title VI Program update, and an opportunity to give feedback. Emails were sent to 4,600 targeted listserv subscribers directing them to the page. From August 12 to September 12, 2016, the page received 700 unique views and ten community members provided comments about the policies.

- Transit Equity Advisory Committee (TEAC)
TriMet staff consulted with TEAC throughout the Program update process. The committee gave input on the outreach strategy and materials, and some members helped facilitate discussions at the community forums. At its August 18, 2016 meeting TEAC reviewed and discussed the updated Major Service Change, Disparate Impact, and Disproportionate Burden policies.

LANGUAGE ASSISTANCE 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 2010 TriMet completed its **LEP Access Plan** and Implementation Schedule after an extensive review of the LEP populations in the TriMet service district and their needs. A special LEP Workgroup recommended a two-tiered approach to meeting 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 E.

From the Title VI Circular

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

Updated Four Factor Analysis

In accordance with FTA's policy guidance, the initial step for providing meaningful access to services for LEP persons and maintaining an effective LEP program is to identify LEP populations in the service area and their language characteristics through an analysis of available data. TriMet is in the process of updating its Four Factor Analysis, with an anticipated completion of fall 2016. It will rely on the most recent data available, including:

- TriMet GIS, Metro Regional Land Information System
- US Census American Community Survey Tables: 2010 - 2014 (5-Year Estimates)
- Portland Public Schools data on ESL students
- Spring 2016 on-board rider survey
- Summer 2016 operator survey about contact with LEP persons
- Internal data reflecting call center requests for language interpretation and page views of translated versions of www.trimet.org

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 included in this report in advance of the completed Four Factor Analysis, shown in Table I-3. This data shows that of the estimated total population aged five years and older within Clackamas, Multnomah, and Washington counties LEP populations represent 8.73 percent with the largest proportion consisting of Spanish speaking LEP individuals (4.18 percent).

The top five languages (Spanish, Vietnamese, Chinese, Russian and Korean) identified using US Census American Community Survey Tables: 2010 - 2014 (5-Year Estimates) mirror the top five languages identified in the 2012 Four Factor Analysis performed by TriMet using the ACS 2006-2010 five-year sample data. These top five languages comprise 75.9 percent of the total LEP population as shown in Table I-3.

Additionally, using Oregon Department of Education data, Somali and Hmong were identified in 2012 as meeting ODT’s “safe harbor” threshold of 1,000 or five percent of the population. More recent data from Portland Public Schools – the largest school district in the region – also indicates that Somali is the fifth most common language spoken by students in the ESL Program (provided as Attachment F).

The map on page 24 (Figure I-1: 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 (8.7 percent). Most LEP census tracts are located in the western, eastern, and northern parts of the service area.

TABLE I-3: ACS LANGUAGES SPOKEN BY LEP PERSONS AGE 5 AND OLDER IN TRIMET DISTRICT

Languages Spoken at Home	LEP Population Estimate	Percentage of Total Population	Percentage of LEP Population
Spanish	59,846	4.18%	47.94%
Vietnamese	14,132	0.99%	11.32%
Chinese (Cantonese, Mandarin)	10,152	0.71%	8.13%
Russian	6,834	0.48%	5.47%
Korean	3,850	0.27%	3.08%
Ukrainian*	2,091	0.15%	1.67%
Japanese	2,074	0.14%	1.66%
Tagalog	1,950	0.14%	1.56%
Romanian*	1,862	0.13%	1.49%
Arabic	1,715	0.12%	1.37%
Mon- Khmer, Cambodian	1,407	0.10%	1.13%
Persian	1,097	0.08%	0.88%
Other languages	17,837	1.25%	14.29%
Total	124,848	8.73%	

Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Tables: 2010 - 2014 (5-Year Estimates).

*Ukrainian and Romanian figures were only available for Multnomah and Washington counties

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-RIDE thereby accessing real time information on the next train or bus arrival. All LEP customers can access language assistance by calling 503-238-RIDE. In the past three years, language assistance has been provided to customers comprising over 50 languages. Sixty five 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. Channel cards shown in Figures I-2 through I-4 have been placed in all vehicles. TriMet also expanded the number of languages included in its “How to Ride brochure.” Figure I-5 shows the updated brochure cover.

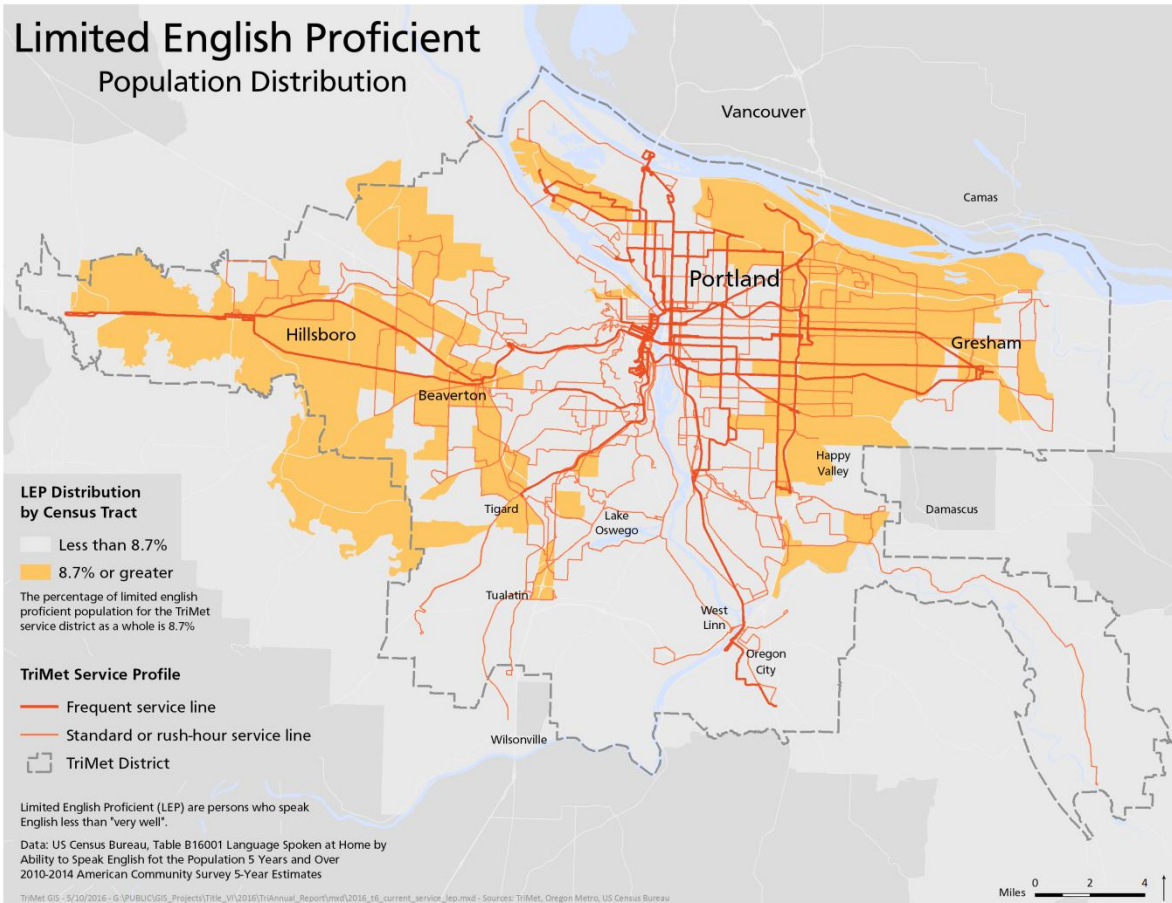


FIGURE I-1: LEP POPULATION AND TRIMET DISTRICT

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-2: BILINGUAL SAFETY CHANNEL CARD



FOR YOUR SAFETY

Para su seguridad



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



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



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



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



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

FIGURE I-3: BILINGUAL FOR YOUR SAFETY CHANNEL CARD



RULES FOR RIDING

Reglas para el viaje



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



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



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



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



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



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



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

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

FIGURE I-4: BILINGUAL RULES FOR RIDING CHANNEL CARD



English • Español • Tiếng Việt
Русский • 中文 • اللغة العربية
Română • 한국어 • 日本語 • Tagalog
ភាសាខ្មែរ • Somali

Fares and how to ride
Tarifas y cómo viajar
Giá vé & cách sử dụng
xe Buýt, xe điện MAX và WES
Плата за проезд
и как поехать
车票价格和乘车指南
ثمن التذاكر وكيفية الركوب
Tarife și modalitatea de
călătorie
요금 과 승차방법
料金および乗車方法
Mga pamasahe at paano
sumakay
ផ្លូវល្អ និង របៀបធ្វើដំណើរ
Tigidhada iyo sida loo raaco

FIGURE I-5: MULTILINGUAL HOW TO RIDE BROCHURE

SUBRECIPIENT MONITORING

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

Project Oversight

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

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

Assessments

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

- Demographic data to update their Title VI public participation and language assistance plans; and

- Procurement reviews to ensure federal requirements are met.

Subrecipient Title VI Program Review

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

From the Title VI Circular

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

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

To monitor Title VI compliance, TriMet:

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

Subrecipients must submit a Title VI Program to TriMet within 30 days of their grant award (grants awarded after September 1, 2013) and every three years after initial submission on April 30th. TriMet reviews all subrecipient Title VI Programs on a triennial basis and also receives and reviews annual reports submitted on or by April 30th.

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 ADA, Transit Equity and Fiscal matters, the General Manager and Board seek guidance from three additional committees: the Committee on Accessible Transportation (CAT), the Transit Equity Advisory Committee (TEAC) and the General Manager Budget Taskforce. Members at each level are recruited to provide diverse perspectives necessary for holistic decision-making. Board membership is presented in Table I-4: TriMet board membership by race/ethnicity below.

TABLE I-4: TriMET BOARD MEMBERSHIP BY RACE/ETHNICITY

Body	# of Members	White*	Hispanic	Black*	Asian*	Native American*	Hawaiian Native and Pacific Islander*	Other *
Population	1,526,154	72.1%	12.3%	3.4%	7.3%	0.5%	0.5%	3.8%
Board of Directors	7	71%	0%	29%	0%	0%	0%	0%
Finance & Audit Committee	3	67%	0%	33%	0%	0%	0%	0%
GM Budget Task Force (no longer meets)	12	66%	17%	17%	0%	0%	0%	0%
Transit Equity Advisory Committee	14	57%	14%	29%	0%	0%	0%	0%
Committee on Accessible Transportation	14	93%	7%	0%	0%	0%	0%	0%
*Non-Hispanic								

Board and Committee Recruitment

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

The **Finance & Audit Committee** is made up of three Board members and 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 **General Manager's Budget Task Force** was organized in 2011 to advise TriMet on how to prioritize the 2012 TriMet budget cuts. Committee membership is appointed by the General Manager and represents a broad cross section of the community.

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 17-member panel with one TriMet Board Member.

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

FACILITIES SITING AND CONSTRUCTION

Since the last Title VI Program submission in 2013, TriMet has selected a site for one facility meeting the applicable definitions under Title VI, and thereby requiring an equity analysis (provided as Attachment G). TriMet's process for conducting equity

analyses related to facility siting and construction follows the guidance provided in the Circular/Title 49 CFR and included below.

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

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

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

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

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

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

the basis of race, color, or national origin, and then implement the least discriminatory alternative.

MAJOR SERVICE AND FARE CHANGE EQUITY ANALYSES

TriMet considers possible equity impacts in developing potential service and fare changes, and evaluates proposals for Major Service Changes and any fare changes for potential adverse effects, Disparate Impacts, and/or disproportionate burdens. Since the time of the last Title VI Program submittal TriMet has implemented several improvements to service and changes to fares. The seven reports noted below cover the equity analyses of all Major Service Changes and all fare changes implemented since September 2013, and are provided as Attachments H – N, along with corresponding documentation of the TriMet board’s consideration, awareness, and approval of each.

- **Fall 2014 Fare & Service Change Equity Analysis Report;** May 22, 2014
 - Board approval at June 11, 2014 business meeting

- **Ordinance No. 332 Transfer Policy Change: Fare Equity Analysis;** December 9, 2014
 - Board approval at December 10, 2014 business meeting

- **Equity Analysis: Weekend Frequent Service Restoration;** March 3, 2015
 - Board approval at May 27, 2015 business meeting

- **Equity Analysis: Orange Line MAX Startup & Bus Service Plan;** April 17, 2015
 - Board approval at May 27, 2015 business meeting

- **Equity Analysis: Honored Citizen Fare Increase;** April 17, 2015 [Updated May 20, 2015]
 - Board approval at May 27, 2015 business meeting

- **Title VI Fare Equity Analysis for Migration to E-Fare;** January 6, 2016
 - Board approval at February 24, 2016 business meeting

- **Equity Analysis: Spring 2016 – Spring 2017 Service Changes;** March 16, 2016
 - Board approval at April 27, 2016 business meeting

Part II: Title VI Policies

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

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

Policies on Major Service Change, Disparate Impact, and Disproportionate Burden have been shared for public information, awareness, and comment. They were informed by a series of three community forums and a questionnaire sent to community service providers in spring and summer 2016, as well as feedback gathered since TriMet's last submittal in 2013. 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 consideration and included in the subsequent TriMet Title VI Program report with a record of action taken by the Board.

TriMet defines a Major Service Change as:

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

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

The strategy TriMet employed to inform the Major Service Change threshold 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. While two online commenters expressed concern that lowering the threshold would add costs and delays to changing service, the majority of responses to the changes were supportive. (TriMet staff does not anticipate that this change will increase costs or add delay to service changes).

Two questions framing the discussions at community forums (see Attachment X) were designed to test whether community members valued the various types of changes differently, including service increases compared to decreases. Priorities varied amongst participants, but overall increasing span of service was valued somewhat higher than other improvements. For service cuts, participants generally indicated that reducing frequency was preferable to other types of cuts. After

considering this input and how it would impact the equity analysis process going forward, TriMet opted to keep a consistent – but lower – threshold for all types of changes.

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.

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...

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 equitable impact. Otherwise, TriMet will take measures to minimize or mitigate the adverse impact of the proposed action.

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.

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., 31 percent compared to 28 percent).
 - b) To determine the *system-wide* impacts of Major Service Change reductions on more than one line, the percentage of the TriMet district's minority population that is impacted is compared to the percentage of the TriMet district's non-minority population that is impacted. If the percentage of the minority population impacted is at least 20 percent greater than the percentage of the non-minority population impacted (e.g., 12 percent compared to 10 percent), the overall impact of changes will be considered disparate.
2. In the event of service improvements:
 - a) A major service change to a *single line* will be considered to have a potential Disparate Impact if:
 - i. The improvement is linked to other service changes that have disproportionate and adverse effects on minority populations, or;
 - ii. The percentage of impacted minority population in the service area of the line is less than the percentage of minority population of the TriMet District as a whole by at least 3 percentage points (e.g., 25 percent compared to 28 percent).
 - b) To determine the *system-wide* impacts of major service change improvements on more than one line, the percentage of the TriMet district's minority population that is impacted is compared to the

percentage of the TriMet district's non-minority population that is impacted. If the percentage of the minority population impacted is at least 20 percent less than the percentage of the non-minority population impacted (e.g., 8 percent compared to 10 percent), the overall impact of changes will be considered disparate.

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

Upon determination of Disparate Impact, TriMet will either:

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

Fare Changes

For fare changes, a potential Disparate Impact is noted when the percentage of trips by minority riders using a fare option, in combination with the percentage price change for that option, has an impact that exceeds the comparable impact on non-minority riders.

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

Public Participation

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.

At the community forums, held in partnership with community-based organizations, participants were asked whether they felt that looking at the low-income and minority population living by transit lines proposed for changes was a good way to measure potential impacts, or whether there were other factors TriMet should consider. Participants supported the former population-based approach as a piece of what should be considered, but consistently suggested TriMet include access to jobs, education, and health care when conducting equity analysis. After reviewing the draft policies, TEAC recommended adding food access to this list.

Much of the feedback received through all outreach methods focused on affordability of fares. Community members were concerned about the burden that transportation

costs place on low-income families. TriMet's current Disparate Impact policy for fare changes establishes a high standard for identifying differential impacts in the event of fare changes; therefore it was not modified for this Program update.

DISPROPORTIONATE BURDEN POLICY

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

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

From the Title VI Circular

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

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

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

1. A decrease in the level of transit service (hours, days, and/or frequency); and/or

2. Decreased access to comparable transit service, which is defined as an increase of the access distance to beyond one-quarter mile of bus stops or one-half mile of rail stations.

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

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

impacted. If the percentage of the low-income population impacted is at least 20 percent less than the percentage of the non-low-income population impacted (e.g., 8 percent compared to 10 percent), the overall impact of changes will be considered disparate.

3. Additional considerations to complement the quantitative Disproportionate Burden analysis above may include evaluating impacts to accessing employment, education, food, 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 Disproportionate Burden is noted when the percentage of trips by low-income riders using a fare option, in combination with the percentage price change for that option, has an impact that exceeds the comparable impact on non-low-income riders.

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

Public Participation

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.

At the community forums, held in partnership with community-based organizations, participants were asked whether they felt that looking at the low-income and minority population living by transit lines proposed for changes was a good way to measure potential impacts, or whether there were other factors TriMet should consider. Participants supported the former population-based approach as a piece of what should be considered, but consistently suggested TriMet include access to jobs, education, and health care when conducting equity analysis. After reviewing the draft policies, TEAC recommended adding food access to this list.

Much of the feedback received through all outreach methods focused on affordability of fares. Community members were concerned about the burden that transportation costs place on low-income families. TriMet's current Disproportionate Burden policy

for fare changes establishes a high standard for identifying differential impacts in the event of fare changes; therefore it was not modified for this Program update.

Part III: System-Wide Service Policies and Standards

In December 2014 the TriMet Board adopted the following five priority considerations for service planning decision-making (Attachment O 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
<i>Notes: All MAX operates as 2-car trains. WES may operate as a single-car or a 2-car train.</i>				

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.

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

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

Given that MAX lines and frequent service bus lines are designed and operated to serve maximum ridership, these lines also serve above-average shares of minority and poverty populations. Frequent service bus lines and all MAX lines taken together serve 48 percent of the population of the TriMet Service District (about 725,000 of a total of 1.5 million). Among populations served by frequent service, 31 percent are minority and 30 percent are low-income as defined by TriMet. These shares are greater than the overall minority (28 percent) and low-income (24 percent) population in the TriMet District.

STANDARD - ON-TIME PERFORMANCE

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

STANDARD – SERVICE AVAILABILITY

TriMet’s standard for availability of service is that persons residing within one-half mile of bus stops and/or rail stations are considered served. Service availability is expressed as number and percentage of District-wide population and is determined by mode; for bus, MAX, and WES respectively. The calculation of distance is based on May 2016 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 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 Guidelines 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.

Shelter Placement - TriMet continues to use ridership as the primary criterion for determining shelter placement. Minimum threshold for shelter consideration is an average of 50 or more boardings per weekday. A variety of bus shelter shapes and sizes are available to address site restrictions, opportunities, and ridership needs. A seating bench is included with the shelter.

Stand Alone Seating Options – Ridership figures are similarly used to determine seating requirements while the built environment often dictates seating options. A premium bench (with a minimum of 25 average daily boardings) is considered in business and retail districts where shelters are not appropriate. A pole-mounted seat (minimum of 12 average daily boardings) would be appropriate where there are curb tight sidewalks. An ad bench (no minimum ridership) would be considered at any stop lacking amenities if in a safe location.

Trash Can Placement – Trash cans are only placed at sheltered bus stops with high ridership and must not infringe upon the ADA pad or pedestrian pathway.

LIGHT RAIL (“MAX”) STATION DESIGN

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

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

Shelters/canopies – criteria text does not specifically require the provision of shelters, but practice has been to provide cover at light rail stations. Cover is often provided by one or more stand-alone shelters on the platform, but has also provided by cover mounted to adjacent buildings. Stand-alone shelters vary in size. Two stand-alone shelters is the most typical practice, but single stand-alone structures and building mounted canopies have also been used.

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

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

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

COMMUTER RAIL (“WES”) DESIGN

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

CUSTOMER INFORMATION

TriMet’s Design Criteria governs the design of light rail projects, is also a key reference for Commuter Rail, and contains the bulk of requirements for customer

information items for signage and graphics. TriMet's Bus Stops Guidelines govern the design of bus stops and contains considerations for customer information. Subsections below summarize typical customer information deployment practices by mode. In addition to these practices, TriMet also considers unique usage factors, transfer locations, service frequency, schedule reliability, special needs, and the specific location of a given stop along a route when identifying placement of customer information amenities.

Bus

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

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

Pole-mounted information displays: Displays that include route number; route name; direction; stop name; simple route map; Stop ID number for use with TransitTracker™ via phone, text or trimet.org; and call-to-action and are placed at all bus stops without BCIDs or variable stop ID signs (complete implementation is expected as of December 2016).

Digital equipment such as electronic real-time arrival displays 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 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 which vehicles serve which routes involves several considerations. 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 September 2016 includes 654 buses, all of which are low-floor and are equipped with automated stop announcement systems.

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

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

From the Title VI Circular

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

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

In regard to assessing the results of TriMet’s vehicle assignment practices in the context of Title VI, the expectation is that the average age of vehicles on “minority lines” should be no more than the average age of vehicles on “non-minority” lines.

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. Specifically, TriMet monitors the following service and performance metrics:

1. "Minority" and "Non-minority" lines
2. Service frequency and span
3. On-time performance
4. Vehicle loads
5. Service availability
6. Stop amenities
7. Vehicle assignment

1. MINORITY & NON-MINORITY LINES

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

Currently TriMet operates a total of 86 lines, including 78 bus lines, 5 MAX light rail lines, and 1 WES commuter rail line. Of these, 40 bus lines as well as 4 MAX lines are considered minority lines. The remaining 38 bus lines, 1 MAX line, and WES commuter rail are considered non-minority lines. In previous reports WES had been considered a minority line, but updated data from the 2010-2014 American Community Survey indicates a change in demographics around station areas to a lower percentage minority population.

As of spring 2016, Minority lines account for 66% of TriMet system service (measured by revenue hours), and 78% of system boarding rides. TriMet generally aligns service with mobility needs and ridership, thus lines serving areas with above-average minority populations typically have higher ridership and therefore a higher overall level of service than non-minority lines.

2. 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.
 2. Saturday service on minority bus lines is more frequent than on non-minority lines during the day, equal in frequency during evenings and slightly less frequent during early AM and night.
 3. Sunday service on minority bus lines is less frequent than on non-minority lines during all time periods.
 4. A higher proportion of minority bus lines operate on Saturday (63 percent) and Sunday (60 percent) than non-minority bus lines on Saturday (39 percent) and Sunday (32 percent).
 5. Service on minority MAX lines is slightly less frequent than service on the one non-minority line (MAX Orange Line) during most time periods on weekdays, Saturdays, and Sundays.
 6. A higher proportion of minority bus lines operate on Saturday (63 percent) and Sunday (60 percent) than non-minority bus lines on Saturday (39 percent) and Sunday (32 percent). All MAX lines operate on Saturday and Sunday.
 7. The average span of service (hours lines are serving riders from start to end of service) on minority lines exceeds the span of service on non-minority lines for bus and MAX on weekdays, Saturdays, and Sundays.
- While non-minority lines on average provide more frequent service during several time periods, especially on Sundays, this is offset by the greater number and proportion of minority lines operating on weekends, as well as the earlier average start of service and later end of service for minority lines for all days and modes. Thus, there are no Disparate Impacts on minority population in regard to frequency or span of service on bus, MAX, or WES.

Table IV-1: Frequency and Span of Service
 Minority and Non-Minority Transit Lines by Mode and Day of Service
 Spring 2016 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.) ¹						Avg. Time Service Begins	Avg. Time Service Ends	Span of Service (hours) ²
					Early AM	AM Peak	Midday	PM Peak	Evening	Night			
Weekday	Bus	Minority Lines	40	100%	28	28	33	29	28	37	5:14	22:28	16.3
		Non-Minority Lines	38	100%	31	34	44	37	37	42	5:38	20:50	13.2
		All bus lines	78	100%	29	31	38	33	32	39	5:25	21:40	14.8
	MAX Light Rail	Minority Lines	4	100%	17	13	14	13	14	27	3:44	1:12	21.4
		Non-Minority Line	1	100%	15	12	15	11	11	23	4:06	0:20	20.2
		All MAX lines	5	100%	16	12	14	12	13	26	3:49	1:01	21.2
	WES Commuter Rail	Non-Minority Line	1	100%	30	30		30	30		5:21	20:02	9.1
	System	Minority Lines	44	100%	26	27	31	27	27	36	5:06	22:43	16.7
		Non-Minority Lines	40	100%	30	33	43	36	36	40	6:26	20:58	12.7
		All lines	84	100%	28	30	36	31	31	37	5:40	21:40	14.6

Notes:

¹Early AM = Start of service 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.

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

Table IV-2: Frequency and Span of Service
 Minority and Non-Minority Transit Lines by Mode and Day of Service
 Spring 2016 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.) *				Avg. Time Service Begins	Avg. Time Service Ends	Span of Service (hours)
					Early AM	Day	Evening	Night			
Saturday	Bus	Minority Lines	25	63%	41	31	34	41	6:00	0:04	18.1
		Non-Minority Lines	15	39%	40	34	34	39	6:41	22:48	15.9
		All bus lines	40	51%	41	32	34	41	6:15	23:35	17.3
	MAX Light Rail	Minority Lines	4	100%	25	15	14	24	3:54	1:23	21.5
		Non-Minority Line	1	100%	24	15	15	23	5:29	1:16	19.8
		All MAX lines	5	100%	25	15	14	24	4:13	1:22	21.1
	System	Minority Lines	29	66%	38	29	31	38	5:43	0:15	18.5
		Non-Minority Lines	16	40%	39	33	32	37	6:36	22:48	16.2
		All lines	45	54%	38	30	32	38	6:01	23:45	17.7

Notes:

¹Early 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.

²Span 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 2016 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.)				Avg. Time Service Begins	Avg. Time Service Ends	Span of Service (hours)
					Early AM	Day	Evening	Night			
Sunday	Bus	Minority Lines	24	60%	45	33	37	43	6:15	23:50	17.6
		Non-Minority Lines	12	32%	34	32	29	38	6:54	23:06	16.2
		All bus lines	36	46%	42	33	35	41	6:27	23:36	17.2
	MAX Light Rail	Minority Lines	4	100%	30	17	15	23	3:53	1:20	21.4
		Non-Minority Line	1	100%	29	17	15	26	5:29	1:16	19.8
		All MAX lines	5	100%	30	17	15	24	4:12	1:19	21.1
	System	Minority Lines	28	64%	42	31	34	39	5:55	0:03	18.1
		Non-Minority Lines	13	33%	32	27	24	32	6:47	23:17	16.5
		All lines	41	49%	39	31	32	38	6:10	23:49	17.6

Notes:

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

²Span 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.

3. ON-TIME PERFORMANCE

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

Table IV-4: On-Time Performance
 Minority and Non-Minority Transit Lines by Mode and Day of Service
 Weekday, Saturday, Sunday
 Spring 2016 Service

Mode of Service	Day	Avg. % On-Time (weighted) ¹		Difference; Minority to Non-Minority +/-
		Minority Lines	Non-Minority Lines	
Bus	Weekday	81%	81%	0%
	Saturday	83	83	0
	Sunday	85	86	(1)
MAX Light Rail ²	Weekday	80	82	(2)
	Saturday	82	86	(4)
	Sunday	82	83	(1)
WES Commuter Rail	Weekday	n/a	97	n/a

Notes:

¹For Bus and MAX service, a vehicle is considered “on time” if it departs no more than 1 minute before to 5 minutes after the scheduled time. For WES, trains that arrive at the end-of-line stations (Beaverton Transit Center or Wilsonville) no more than 4 minutes before or after the scheduled time are considered “on time”. Weighted by revenue vehicle hours.
²MAX Orange Line is the only non-minority MAX Light Rail line. Orange Night Bus excluded from average percent on-time calculation.

Findings

1. Minority and non-minority bus lines’ on-time performance is similar for weekdays, Saturdays, and Sundays.
2. MAX on-time performance for the four minority lines is somewhat lower than the performance of the one non-minority line during weekdays (80 percent vs. 82 percent) and Saturdays (82 percent vs. 86 percent), and is similar on Sundays.
3. WES on-time performance is 97 percent.

- While bus on-time performance indicates no Disparate Impact on minority riders, MAX shows slightly lower performance on minority lines because the one non-minority line is the newest in the system (the MAX Orange Line, opened in September 2015). 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.

4. VEHICLE LOADS

Vehicle loads are examined to determine whether buses or trains are overcrowded. Table IV-5 shows vehicle capacities (including both seating and standing), and Table IV-6 compares average vehicle loads for minority and non-minority lines during the A.M. Peak, Midday, and P.M. Peak times.

Table IV-5: 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.

Table IV-6: Vehicle Loads
 Minority and Non-Minority Transit Lines
 Weekday by Mode and Time Period
 Spring 2016 Service

	Time Period ¹	Minority Lines		Non-Minority Lines	
		Load/Seat Ratio	Mean Load	Load/Seat Ratio	Mean Load
Bus (28 or 39 seats)	AM Peak	0.45	18.3	0.36	17.3
	Midday	0.44	17.0	0.39	14.2
	PM Peak	0.54	19.9	0.47	17.5
MAX Light Rail (128 seats)	AM Peak	0.80	107.2	1.01	115.0
	Midday	0.69	88.2	0.40	61.5
	PM Peak	1.08	120.2	0.33	88.3
WES Commuter Rail (146 seats)	AM Peak	n/a	n/a	0.55	50.0
	PM Peak	n/a	n/a	0.61	64.0

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

Findings

1. Average load/seat ratios range from a low of 0.36 to a high of 1.08. While the load-to-seat ratio is above 1.0 for the non-minority MAX line during AM Peak and for minority MAX lines during PM Peak, all modes are below the maximum load factor for every time period and across both minority and non-minority lines.
 2. Minority lines have somewhat larger loads than non-minority lines across all time periods, with the exception of AM Peak MAX. Observed loads on both groups of lines are well within the established maximum load factor standards.
- Thus, there is no Disparate Impact on minority population in regard to vehicle loads.

5. 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-7 on the next page presents the availability of service by mode for Spring 2016 service.

Findings

1. The percent of minority population with service available exceeds that of the non-minority populations for bus (91 percent vs. 88 percent), MAX (20 percent vs. 15 percent) and WES (>1 percent vs. <1 percent).
- Thus, there are no Disparate Impacts on minority population in regard to availability of service on bus, MAX or WES.

Table IV-7: Availability of Service by Mode
 Minority and Non-Minority Population
 TriMet District
 Spring 2016 Service

			Number and Percentage within 1/2 Mile* of...							
			TriMet District*		Bus		MAX		WES	
			Totals	%	Totals	%	Totals	%	Totals	%
Population (ACS 5 year estimate, 2010-2014)			1,526,154	100.0%	1,348,969	88.4%	245,669	16.1%	11,979	0.8%
Minority	All Minorities		426,154	27.9%	385,900	90.6%	84,483	19.8%	4,754	1.1%
	Black (non-Hispanic)		52,529	3.4%	50,463	96.1%	12,216	23.3%	180	0.3%
	Hispanic		188,244	12.3%	172,742	91.8%	39,850	21.2%	3,631	1.9%
	Asian (non-Hispanic)		112,128	7.3%	97,097	86.6%	20,023	17.9%	433	0.4%
	Native American (non-Hispanic)		8,263	0.5%	7,475	90.5%	1,501	18.2%	65	0.8%
	Hawaiian Native and Pacific Islander (non- Hispanic)		7,490	0.5%	7,131	95.2%	1,306	17.4%	46	0.6%
	Other (Including Mixed Race, non- Hispanic)		57,500	3.8%	50,993	88.7%	9,586	16.7%	398	0.7%
Non-Minority	White (Non- Hispanic)		1,100,000	72.1%	963,069	87.6%	161,187	14.7%	7,225	0.7%

Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Tables: 2010 - 2014 (5-Year Estimates), Table B03002. Hispanic or Latino Origin By Race (Block Group Level Data)

To adjust for the fact that some census block groups are only partially within the TriMet Transit District, we 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. We then multiplied this address fraction by the Census counts to get the estimated TriMet District population. We 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 May 2016 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.

6. STOP AMENITIES

TriMet analyzes the distribution of stop amenities in the TriMet system (shelters, seating, waste receptacles, etc.) in order to identify any potential disparities. Table IV-8 shows the percentage of stops along minority and non-minority lines containing each amenity.

Table IV-8: Stop Amenities on Minority and Non-Minority Lines
Spring 2016

Category of Amenity	Pct of Stops on Minority Lines	Pct of Stops on Non-Minority Lines
Seating	39%	24%
Lighting	60%	65%
Elevators	<1%	<1%
Digital Displays	3%	1%
Shelters	22%	12%
Signs, Maps and/or Schedules	85%	74%
Waste Receptacles	18%	10%

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 (65 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 in regard to the distribution of amenities.

7. VEHICLE ASSIGNMENT

In regard to assessing the results of TriMet's vehicle assignment practices in the context of Title VI, the expectation 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 is shown in Table IV-9.

Table IV-9: Vehicle Assignment
Average Age of Vehicles Assigned by Mode
Spring 2016 Service

Mode of Service	Average Age of Vehicles Assigned (Years)		Difference; Minority to Non-Minority +/-
	Minority Lines	Non-Minority Lines	
Bus	8.3	7.5	1.7
MAX Light Rail	13.8	12.0	1.8
WES Commuter Rail	n/a	Primary: 9.0 Spares: 63.5	n/a

Findings

1. The average age of vehicles on minority bus lines (8.3 years) is about 11% older than the average age of vehicles on non-minority bus lines (7.5 years). This is within the system-wide Disparate Impact threshold of 20%.
 2. The average age of vehicles on minority MAX lines (13.8 years) is 15% older than the average age of vehicles on the non-minority MAX line (12.0 years). This is because the one non-minority MAX line is the newest in the system and involved the procurement of multiple new MAX vehicles. The difference is within the system-wide Disparate Impact threshold of 20%.
 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.

SUMMARY

As summarized in Table IV-10, TriMet finds no disparities in terms of performance standards that would indicate lesser service provision to minority riders or populations. Across nearly every metric minority lines actually performed better than non-minority lines, and minority populations have better access to the TriMet system based on residential proximity to service.

Table IV-10: Evaluation and Findings – Service Standards and Policies
 Comparison of Minority and Non-Minority Lines
 Spring 2016

	Mode of Service			
	Bus	MAX	WES	System
Service Standards				
<i>Vehicle Loads</i>	✓	✓	✓	✓
<i>Service Frequency & Span</i>	✓	✓	✓	✓
<i>On-Time Performance</i>	✓	✓	✓	✓
<i>Service Availability</i>	✓	✓	✓	✓
Distribution of Amenities				
<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>				✓
Vehicle Assignment	✓	✓	✓	✓
✓ = No disparity in performance or distribution				

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:

- 2010-2014 American Community Survey (ACS)
- 2016 TriMet On-board Fare Survey

CURRENT SERVICE AND SERVICE AREA

The maps on the next four pages display the distribution of minority, low-income, and LEP populations in relation to the facilities and services throughout the TriMet service area and Portland metropolitan region.

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.

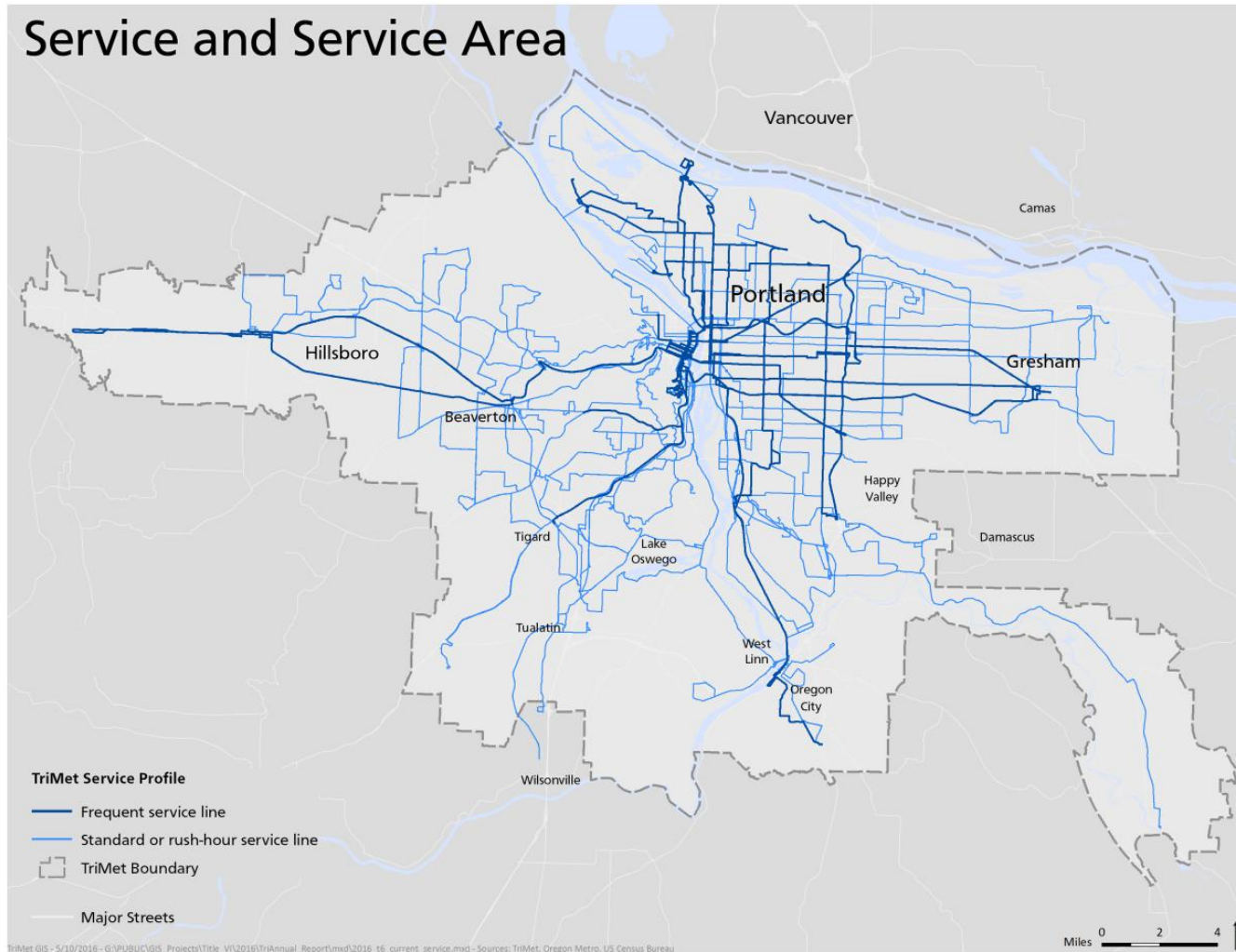


FIGURE V-1: SERVICE AND SERVICE AREA

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 (27.9 percent) as of the 2010-2014 ACS. Patterns are largely similar to TriMet's last Title VI Program submittal in 2013: 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 southern areas of the TriMet district now have above-average minority populations, whereas they were below average in 2013 (near Oregon City and West Linn, for example).

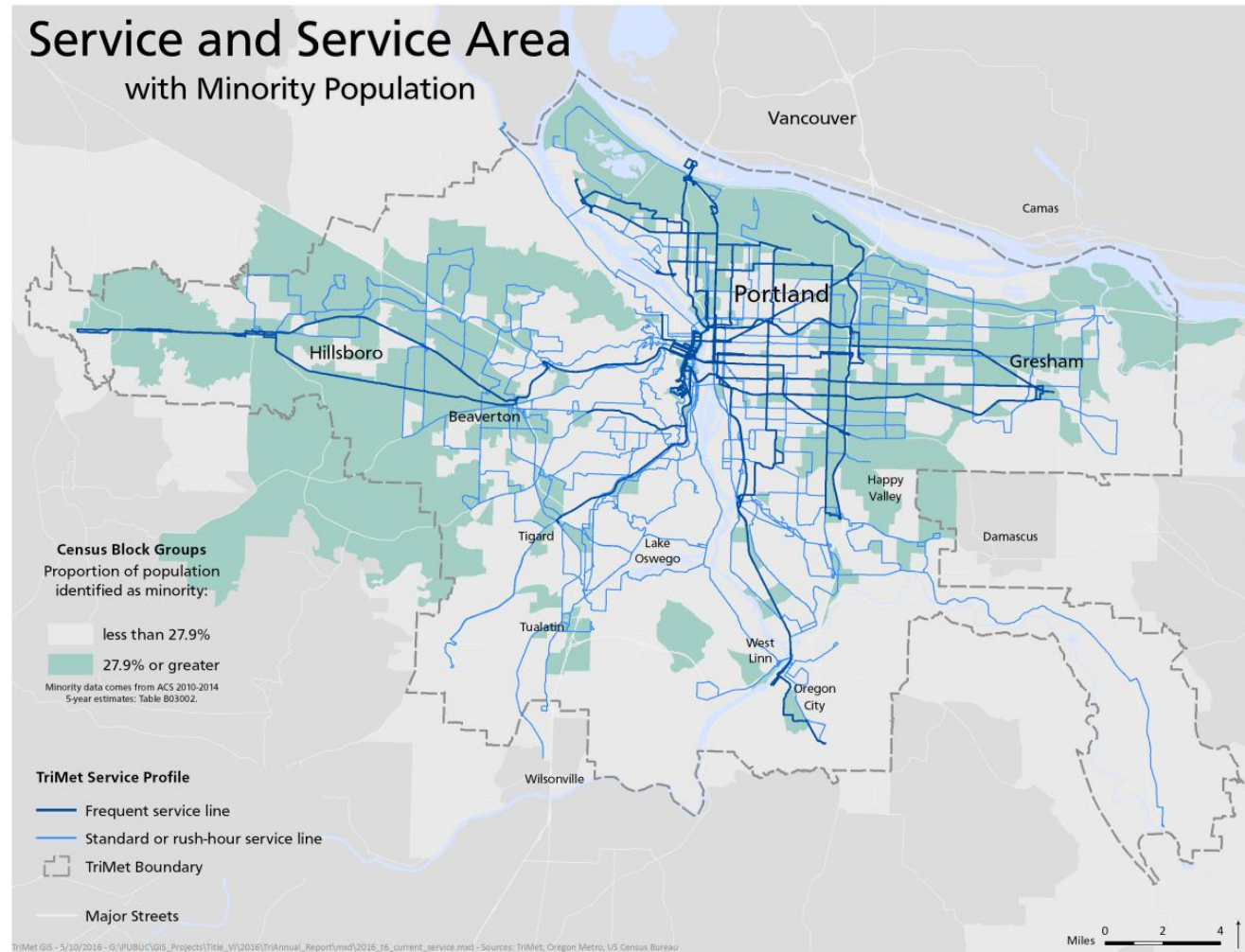


FIGURE V-2: SERVICE AND SERVICE AREA WITH MINORITY POPULATION

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 (23.6 percent) as of the 2010-2014 ACS. High concentrations of low-income households are found throughout the service area.

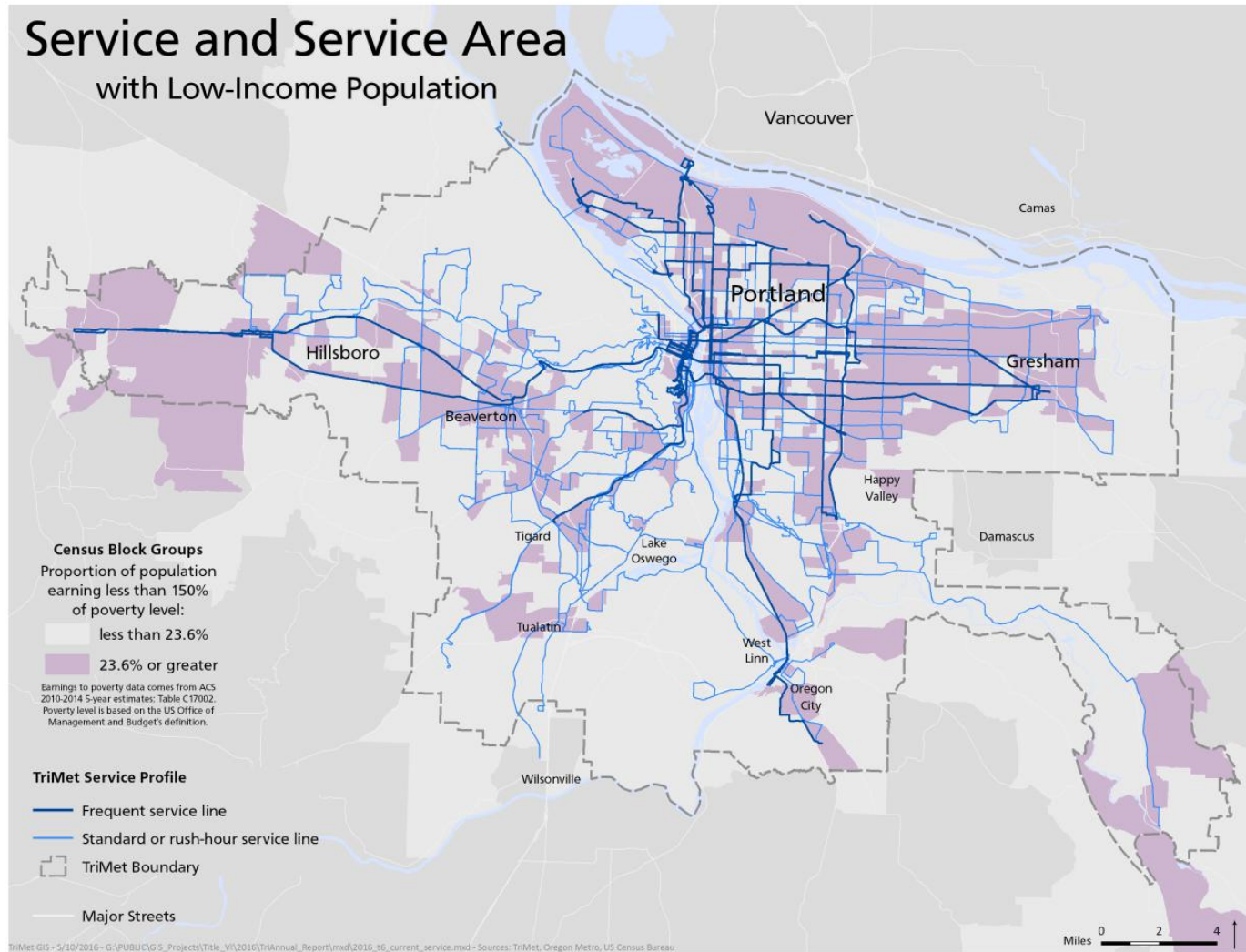


FIGURE V-3: SERVICE AND SERVICE AREA WITH LOW-INCOME POPULATION

Limited English Proficient (LEP) Population Distribution in Figure V-4 depicts the TriMet network in relation to LEP population by census tract, as language information is not available at a smaller geographic scale. Limited English Proficiency is defined as persons who report speaking English less than “very well” in the ACS. Areas are shaded corresponding to census tracts which had a LEP population greater than or equal to the average for the TriMet District (8.7 percent). Similar to the map of minority population, most above-average LEP census tracts are located in the western, eastern, and northern parts of the service area.

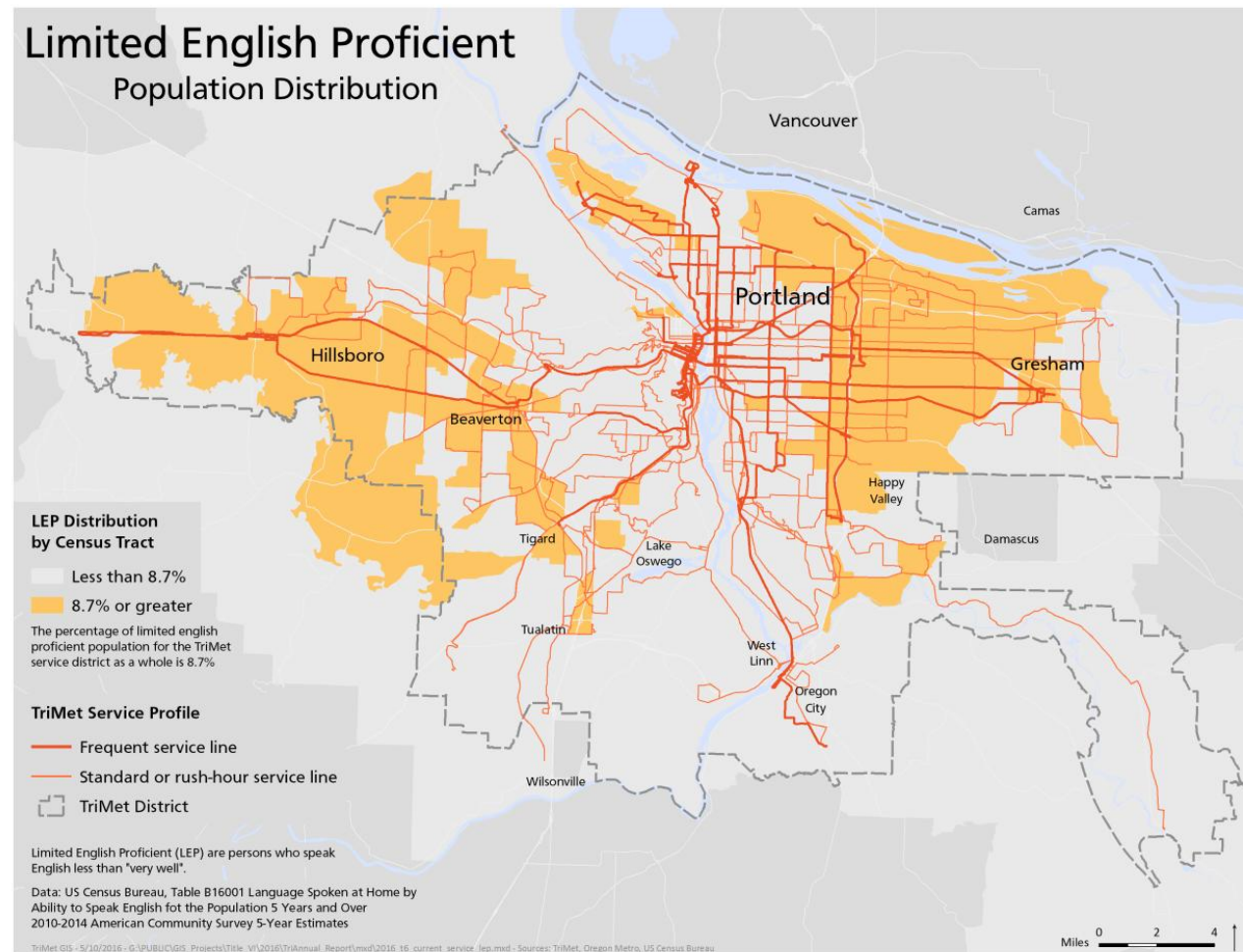


FIGURE V-4: SERVICE AND SERVICE AREA WITH LIMITED ENGLISH PROFICIENT DISTRIBUTION

PROXIMITY TO SERVICE

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

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

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

Demographic Analysis of Proximity to TriMet Service (Percent)		TM District		Percent within 1/2* Mile of...			Frequent Service	
		Totals (Raw Number)	Totals (Pct.)	Bus	MAX	WES	Bus	Bus & MAX
Population	Total (ACS 5 year estimate, 2010-1014)	1,526,154	100.0%	88.4%	16.1%	0.8%	41.6%	47.5%
Minority	All Minorities	426,154	27.9%	90.6%	19.8%	1.1%	44.3%	52.5%
	Black (non-Hispanic)	52,529	3.4%	96.1%	23.3%	0.3%	59.4%	68.7%
	Hispanic	188,244	12.3%	91.8%	21.2%	1.9%	45.8%	55.0%
	Asian (non-Hispanic)	112,128	7.3%	86.6%	17.9%	0.4%	35.4%	42.4%
	Native American (non-Hispanic)	8,263	0.5%	90.5%	18.2%	0.8%	45.8%	53.0%
	Hawaiian Native and Pacific Islander (non-Hispanic)	7,490	0.5%	95.2%	17.4%	0.6%	40.9%	52.6%
	Other (Including Mixed Race, non-Hispanic)	57,500	3.8%	88.7%	16.7%	0.7%	42.7%	48.8%
Non-Minority	White (Non-Hispanic)	1,100,000	72.1%	87.6%	14.7%	0.7%	40.5%	45.6%
Population	Total population with known income (ACS 5 year estimate, 2010-1014)**	1,503,387	100%	88.3%	16.0%	0.8%	41.3%	47.3%
Income	Below 150% of Poverty Level	354,758	23.6%	93.5%	22.7%	1.3%	51.9%	59.9%

Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Tables: 2010 - 2014 (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 May 2016 stop and station locations.

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

RIDERSHIP CHARACTERISTICS AND DEMOGRAPHICS (TRIP BASED)

TriMet Rider Trip Characteristics and Demographic data presented in Attachment P used the TriMet 2016 Fare Survey data to provide a snapshot of weekday trips⁵ made by riders in terms of race/ethnicity, household income, and Limited English Proficiency (LEP).

The majority of weekday trips on TriMet (63%) are made by white non-Hispanic riders; however, the percentage of trips made by minority riders (37%) is greater than the proportion of the TriMet service district's population that minorities represent (28%). Additionally, minority trips increased by ten percentage points from the last Fare Survey in 2012.

About 42% of trips on TriMet are made by low-income riders, which TriMet defines for the purposes of Title VI as those living in households with incomes at or below 150% of the Federal

Poverty Level. This is much greater than the proportion of the TriMet service district's population low-income persons represent (23%).

Of those who took the Fare Survey in Spanish (entire survey available) or ten other languages (two questions available)⁶, few speak English very well (2%-3%), with the

Trips by race/ethnicity
2016 Fare Survey

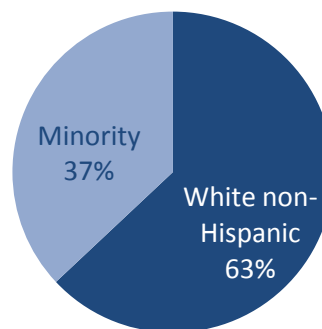


FIGURE V-5: TRIPS BY RACE/ETHNICITY

Trips by income
2016 Fare Survey

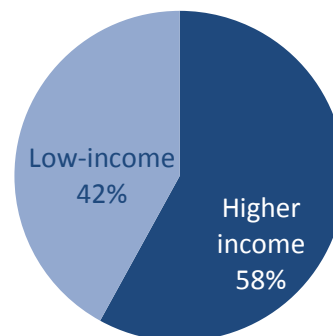


FIGURE V-6: TRIPS BY INCOME

⁵ Data for weekend trips was also collected, but was not ready for reporting in time for this submittal.

⁶ 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.

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 Chinese, Russian, Vietnamese, and Arabic.

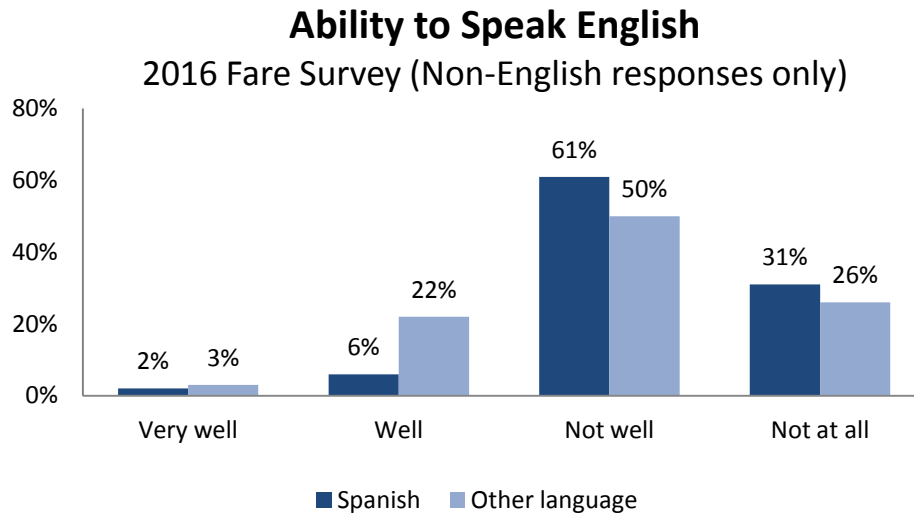


FIGURE V-7 ABILITY TO SPEAK ENGLISH

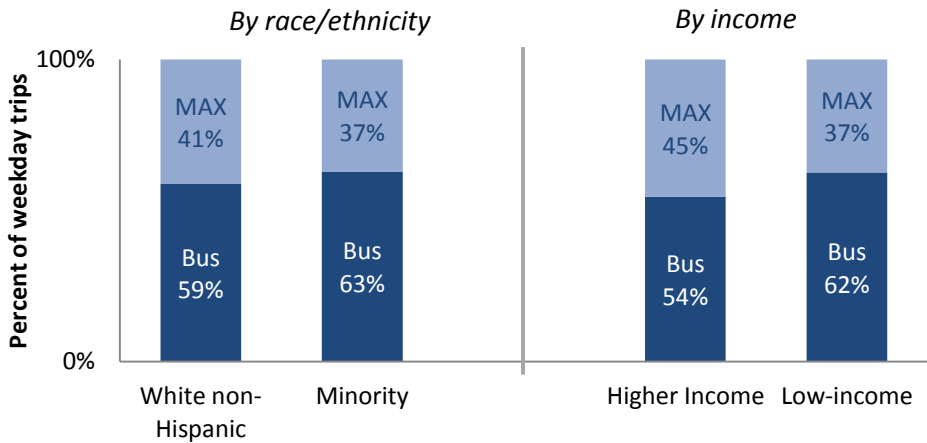
Trip Characteristics by Race/Ethnicity and income

Trip Characteristics by race/ethnicity and income also used data from TriMet's 2016 system-wide on-board Fare Survey. This was a survey of 10% of vehicle trips for bus and MAX light rail routes and a 50% sample of WES commuter rail vehicle trips. Reported differences called out on the following pages meet the standard of statistical significance at the 95% confidence level.

Vehicle Modes used (Bus, MAX, WES)

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

Vehicle Mode 2016 Fare Survey



Note: Trips on WES represent <1% for all groups

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 for minority riders (51%) compared to white non-Hispanic riders (47%). On the other hand, white non-Hispanic riders take a greater portion of their trips during the morning and afternoon peaks (31%) compared to minority riders (27%).

Differences are even greater between low-income and higher income rider trips. Compared to higher income riders, low-income riders take a greater portion of trips during the midday and evening/night, and a smaller portion during early AM and peaks.

Ridership by Time of Day 2016 Fare Survey

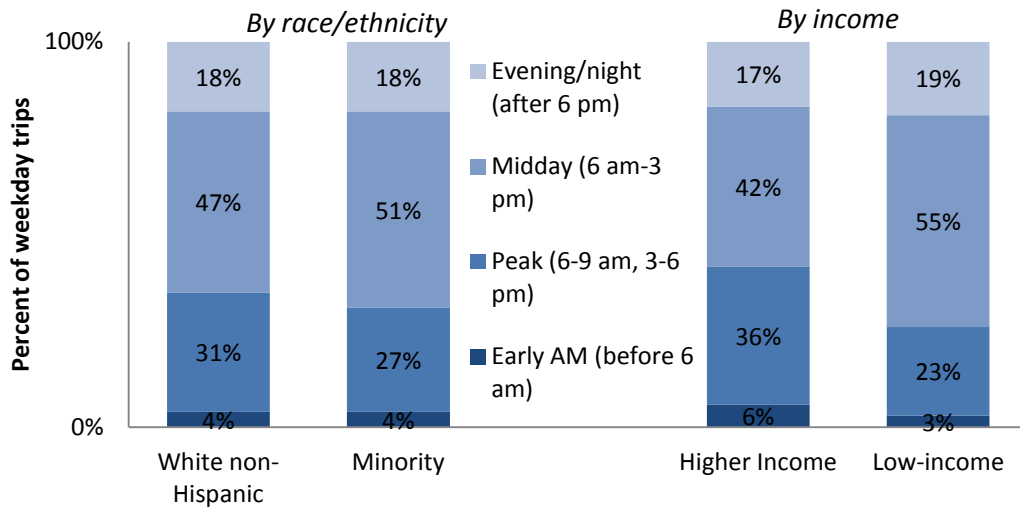


FIGURE V-9: RIDERSHIP BY TIME OF DAY BY RACE/ETHNICITY AND INCOME

Transfers

Most trips on TriMet do not involve a transfer. In other words, the majority of riders enjoy a one-seat ride to complete their one-way trips. However, nearly one-third of trips taken by minority riders include a transfer - higher than the 27% of trips made by white non-Hispanic riders which include a transfer. Trips made by low-income riders are more likely to include a transfer than trips taken by higher income riders (33% vs. 24%, respectively).

Does your trip require a transfer? 2016 Fare Survey

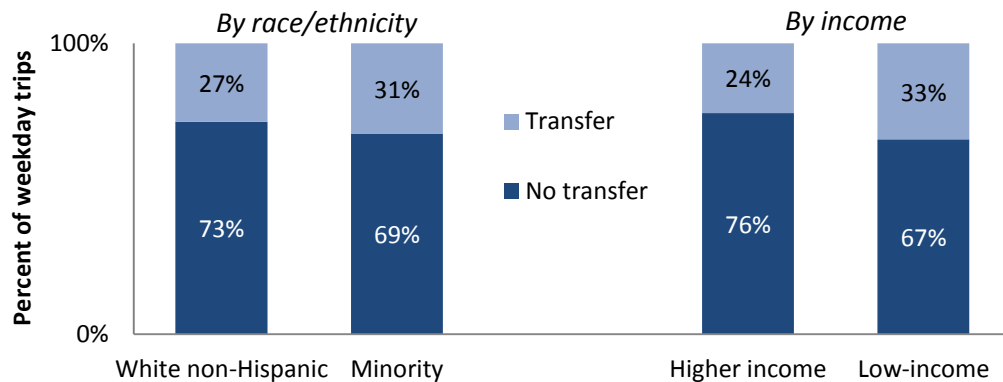


FIGURE V-10: TRANSFER ACTIVITY BY RACE/ETHNICITY AND INCOME

Frequency of Riding TriMet

The number of times respondents rode TriMet in the last week (multiplied to month-level ridership) showed no difference between race/ethnicity groups. On the other hand, trips made by low-income riders were somewhat more likely to be “frequent” (i.e. almost every day) and somewhat less likely to be “occasional” (i.e. a couple of times a month) as compared to higher income riders.

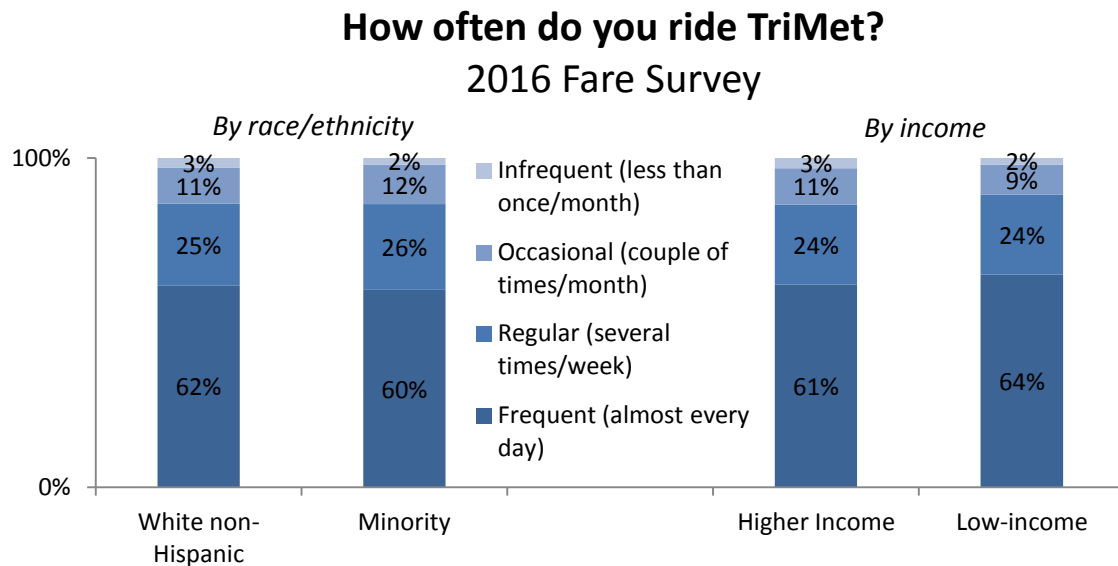


FIGURE V-11: FREQUENCY OF RIDING TRIMET BY RACE/ETHNICITY AND INCOME

Transit-dependency

In order to explore transportation options available to TriMet riders, respondents were asked if they normally have a car available for their use, either as the driver or as a passenger, not including carshare services like Zipcar or Car2Go. About half of white rider responses and 61% of higher income rider responses indicated that they did normally have a car available. This was higher than the 40% of minority rider responses and 28% of low-income rider responses indicating they had access to a car.

Do you normally have access to a car? 2016 Fare Survey

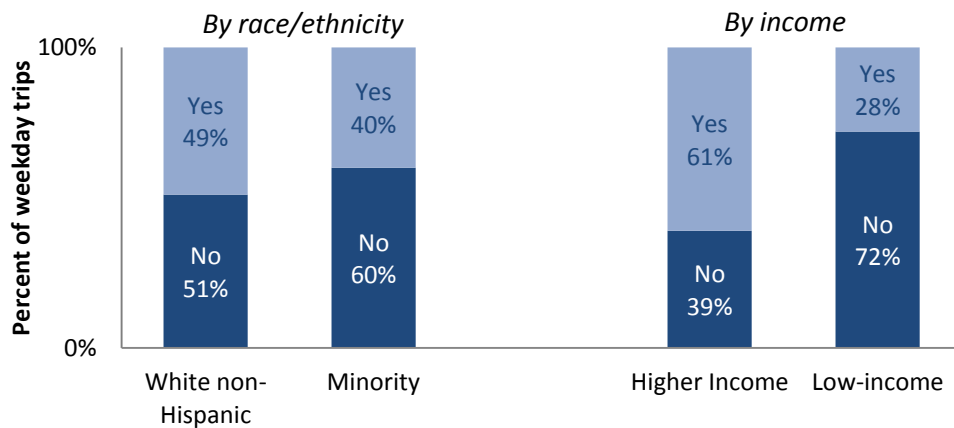


FIGURE V-12: PERSONAL VEHICLE ACCESS BY RACE/ETHNICITY AND INCOME

Fare Payment

Fare payment by race/ethnicity is shown in Figure V-13. Fare payment appears similar comparing minority and white non-Hispanic trips, with the exception of single 2.5-hour tickets, which are somewhat more common for trips taken by minority riders.

How did you pay your fare?

Comparison by race/ethnicity

2016 Fare Survey

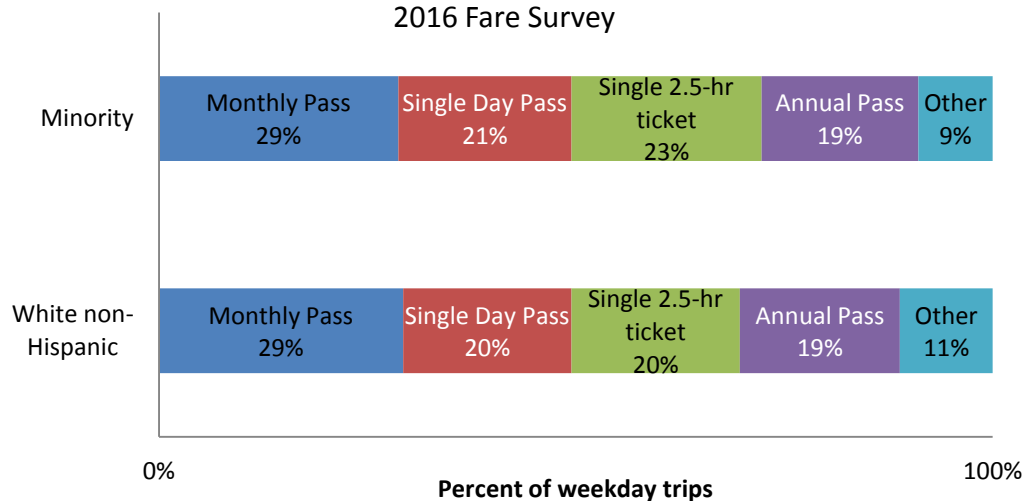


FIGURE V-13: FARE PAYMENT TYPE BY RACE/ETHNICITY

Fare payment comparisons between low-income and higher income riders reveal several differences, as shown in Figure V-14. Compared to fares paid by higher

income riders, low-income fares are more likely to be paid using a monthly pass, a single day pass, or a single 2.5-hour ticket. Nearly one-quarter (22%) of trips taken by higher income riders are paid for using an annual pass, most of which are obtained through employers.

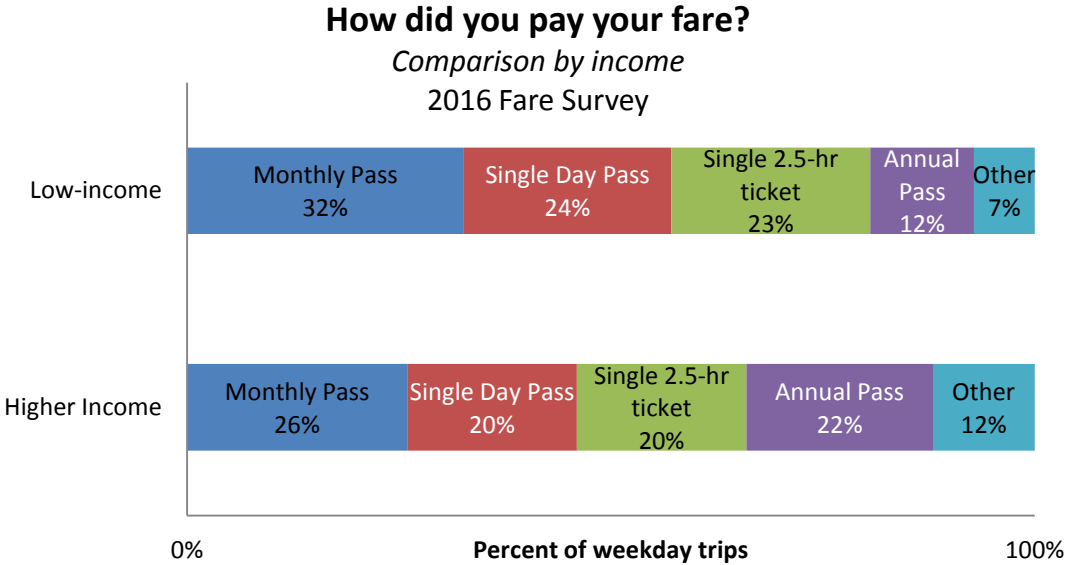


FIGURE V-14: FARE PAYMENT TYPE BY INCOME

In addition to the differences noted above are the following findings about fare payment patterns:

Minority vs. White non-Hispanic

1. White non-Hispanic trips were more commonly paid for using tickets from ticket books (both single fare and day pass ticket books) compared to minority trips.
2. Fares paid by minority riders are more commonly Youth, and less commonly Adult or Honored Citizen compared to non-minorities.
3. Fares purchased by minority riders are more likely to be obtained at a ticket vending machine, on-board the vehicle, or at school than fares purchased by white non-Hispanic riders.

Low-income vs. Higher Income

1. Higher income trips were more commonly paid for using tickets from ticket books (both single fare and day pass ticket books) compared to low-income trips.
2. Fares paid by low-income riders are more commonly Youth or Honored Citizen, and less commonly Adult compared to higher income riders.

- Fares used by low-income riders are more likely to be obtained on-board the vehicle, at school, at a retail store, or through a social service agency than fares used by higher income riders.

Age

According to the Fare Survey there are some age differences between groups. While 7% of white non-Hispanic trips are taken by youth under age 18, 18% of minority trips are taken by youth. Young adults ages 18 to 24 also comprise a higher portion of minority trips than white non-Hispanic trips (24% vs 17%, respectively). On the other hand, a greater portion of white non-Hispanic trips are taken by every age group 25 and above.

Riders under age 24 also make up a greater portion of low-income trips compared to higher income trips, while riders 25 and older make up a smaller portion

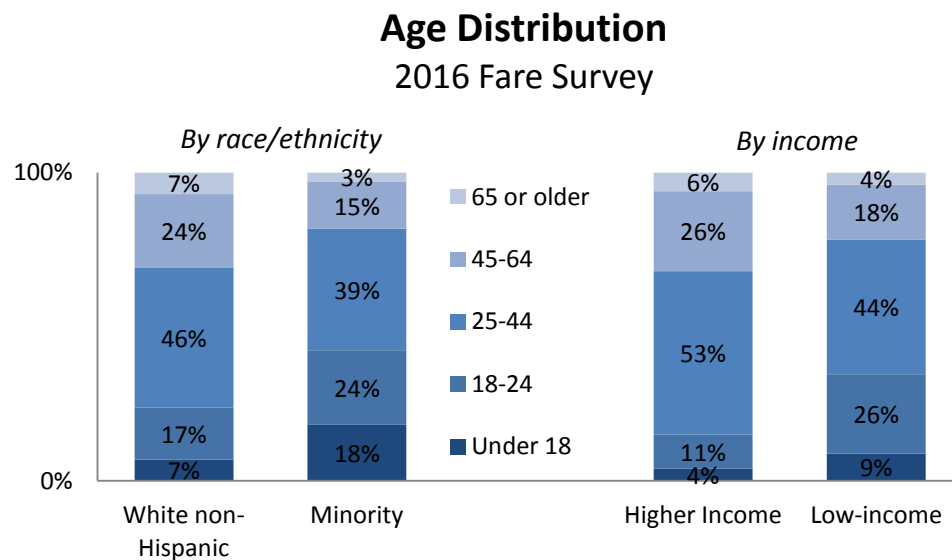


FIGURE V-15: AGE DISTRIBUTION BY RACE/ETHNICITY AND INCOME

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 2016. Data collected will be similar to the 2016 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.

FACILITIES

Three maps (Figures V-16, V-17, and V-18) 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 recently⁷ replaced, improved⁸, or ;
2. Have improvements that are in progress, or;
3. Where improvements are scheduled (planned projects; projects identified in planning documents for an update in the next five years).

Figure V-16, Recent, In Progress, and Planned Facilities is organized by facility type. The improvements shown include the following:

Recently Completed

- Two storage and maintenance facility improvements
- One new MAX light rail line
- 14 MAX light rail station improvements
- 4 major bus stop improvements

In Progress and Planned

- Two Park & Ride improvements
- Three storage and maintenance facility improvements
- One new MAX light rail line
- One new high capacity bus corridor
- 42 MAX light rail station improvements

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

⁷ Recently means since the prior Title VI program submittal in 2013

⁸ Replacement and improvement excludes maintenance activities.

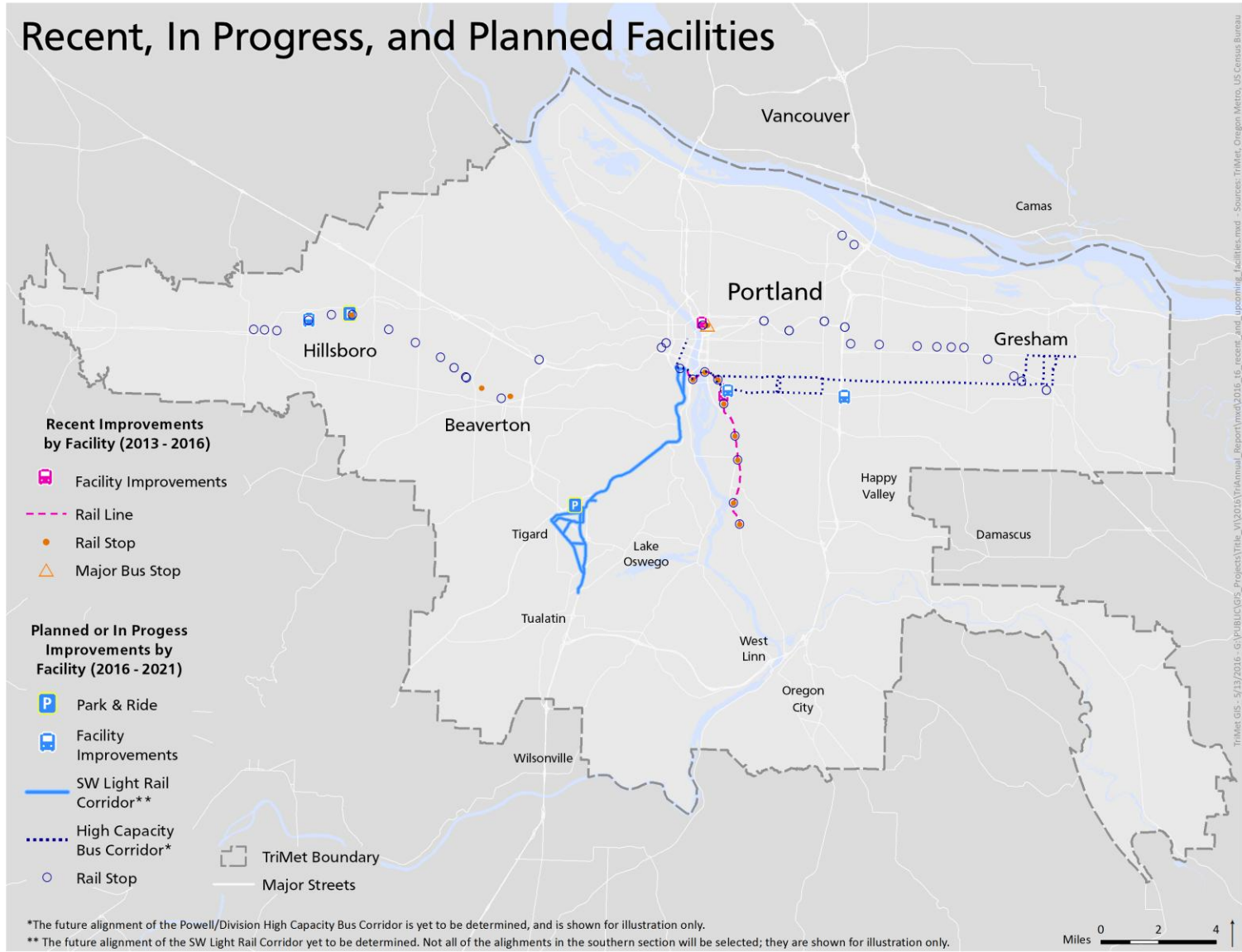


FIGURE V-16: RECENT, IN PROGRESS, AND PLANNED FACILITIES

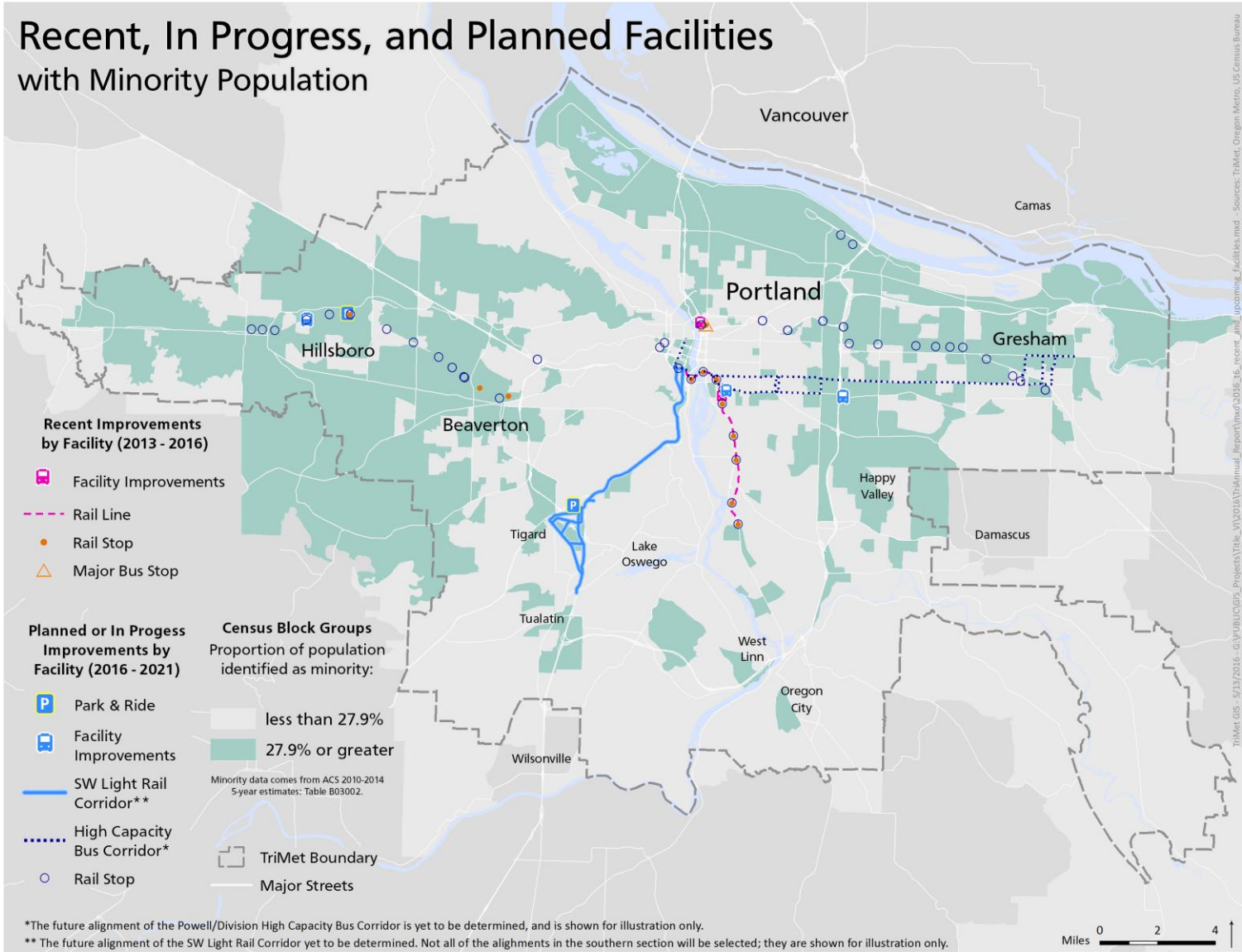


FIGURE V-17: RECENT, IN PROGRESS, AND PLANNED FACILITIES WITH MINORITY POPULATION

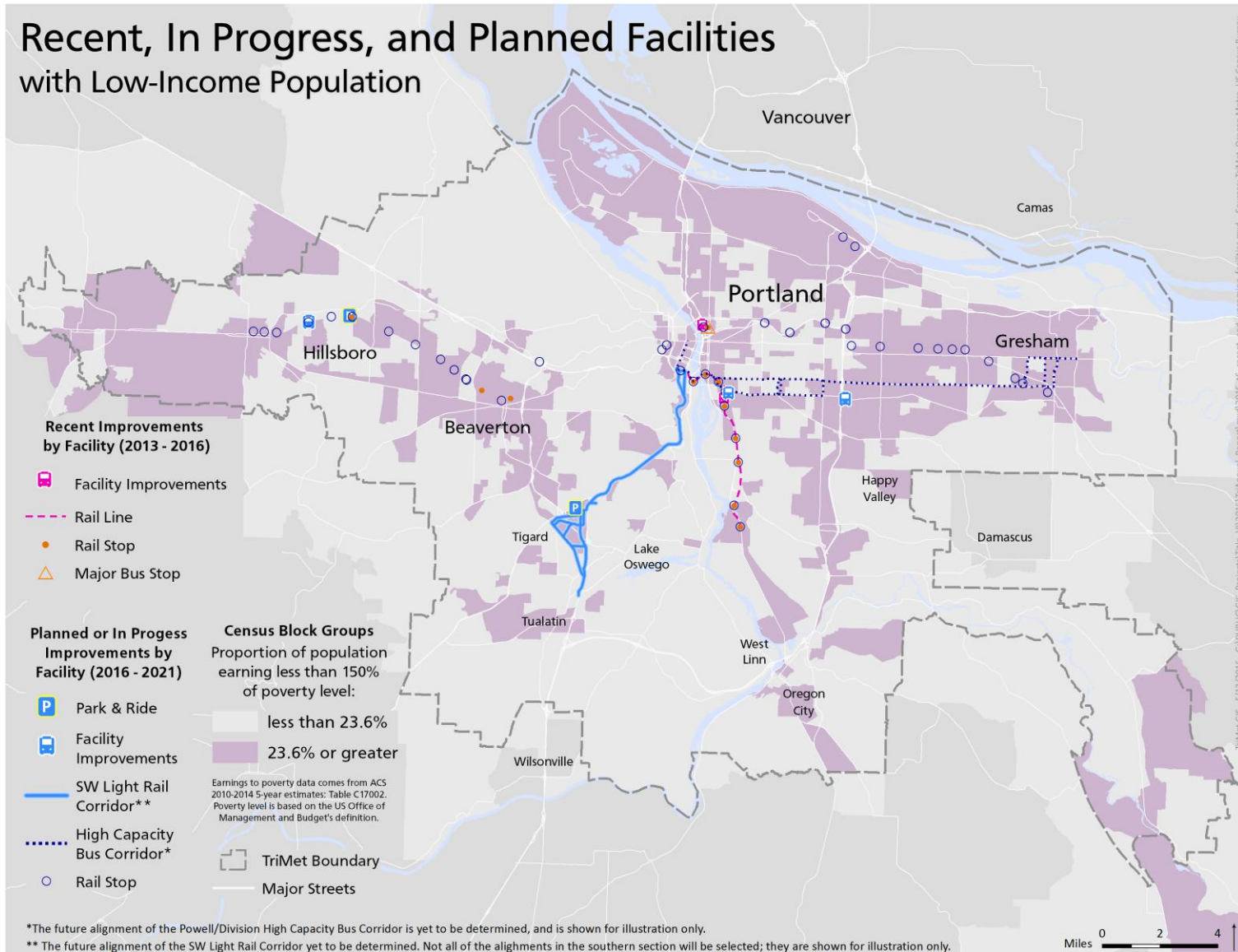


FIGURE V-18: RECENT, IN PROGRESS, AND PLANNED FACILITIES WITH LOW-INCOME POPULATION

Figure V-19 shows the location of **existing facilities** in relation to Frequent Service lines (all five MAX light rail lines and 12 Frequent Service bus lines). Facilities are depicted by type: administrative, operations/maintenance, park & ride, and transit centers.

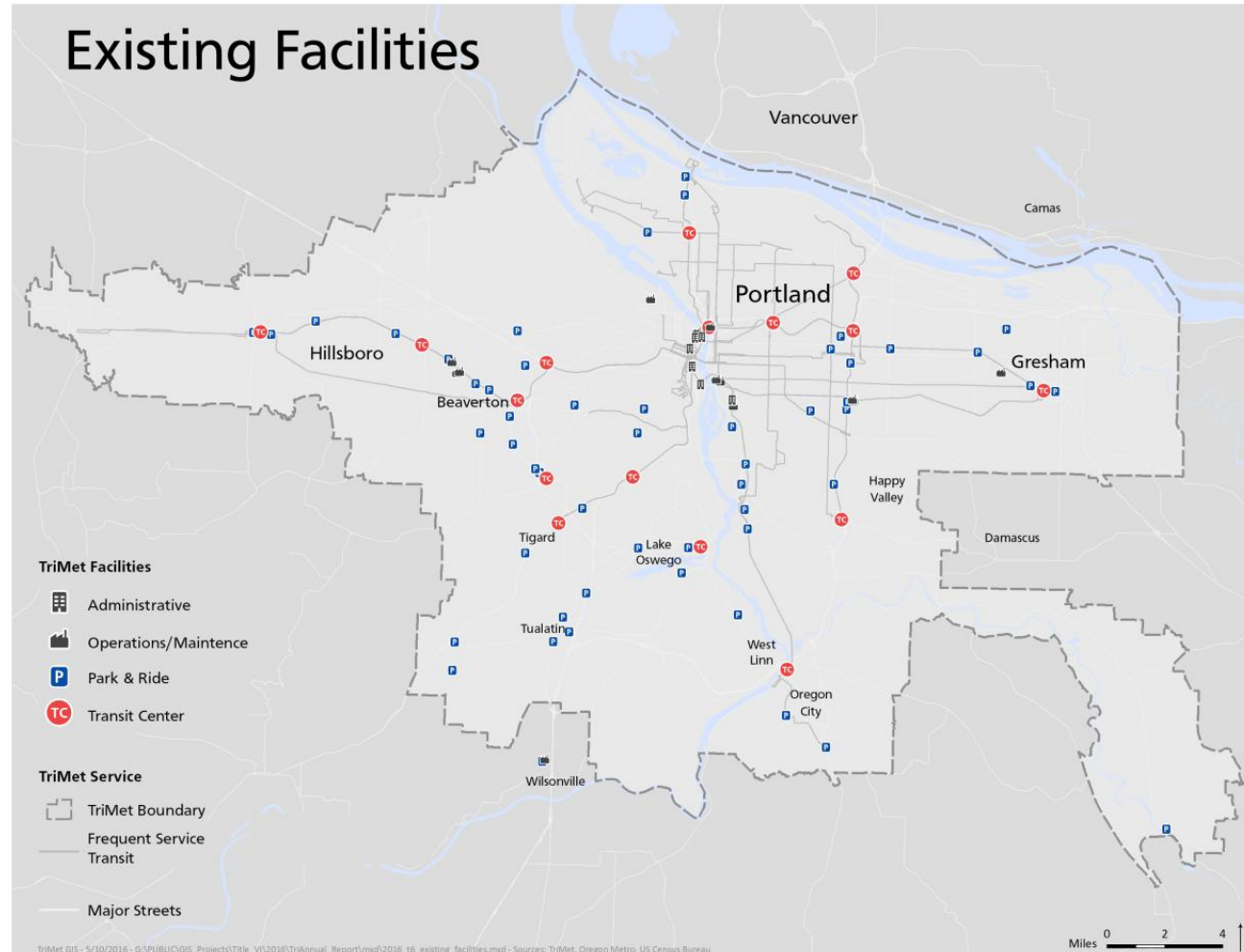


FIGURE V-19: EXISTING FACILITIES

Figure V-20 **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 (27.9 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.

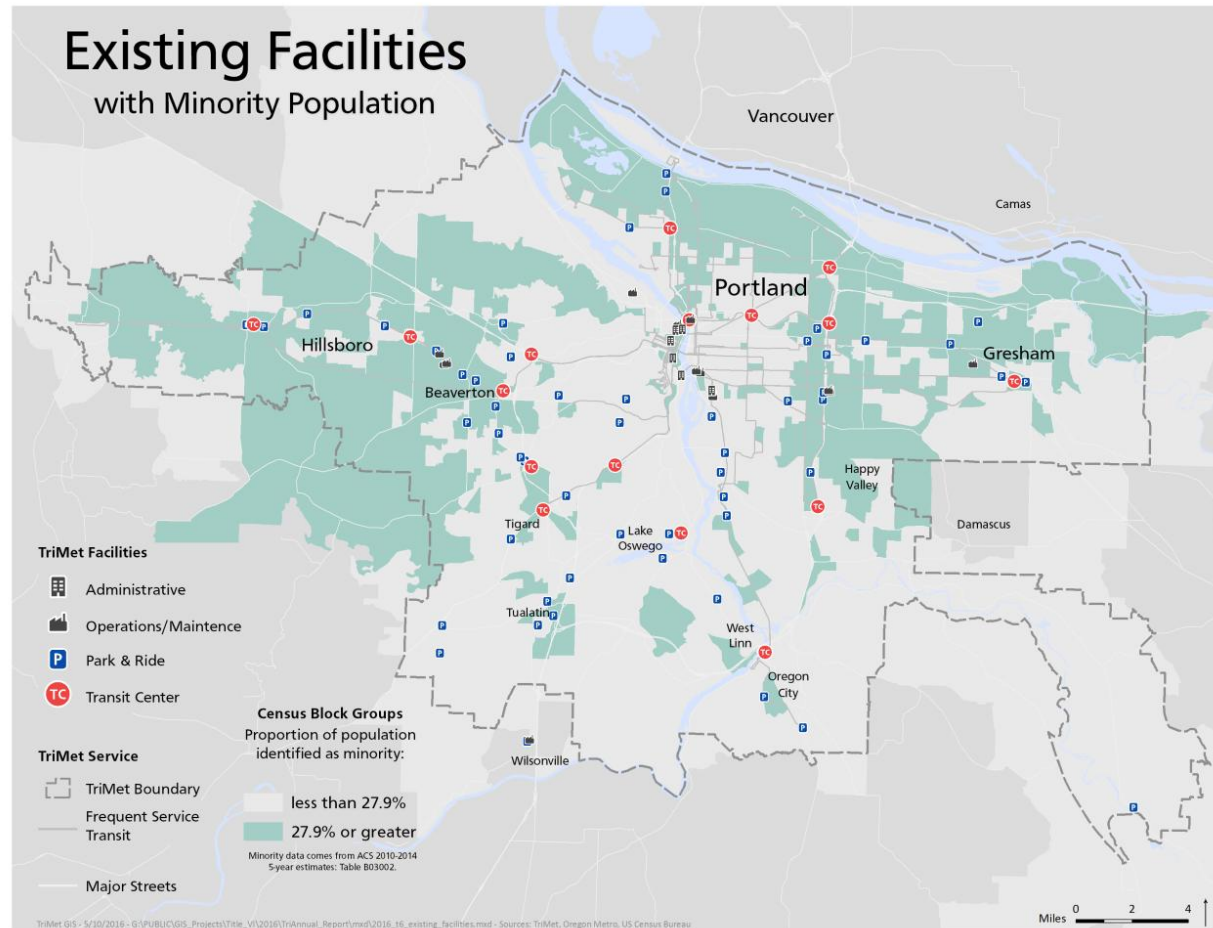


FIGURE V-20: EXISTING FACILITIES WITH MINORITY POPULATION

Figure V-21 **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 (23.6% or greater). Facilities are depicted by type:

type:
 administrative,
 operations/maintenance, park & ride,
 and transit centers.

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

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

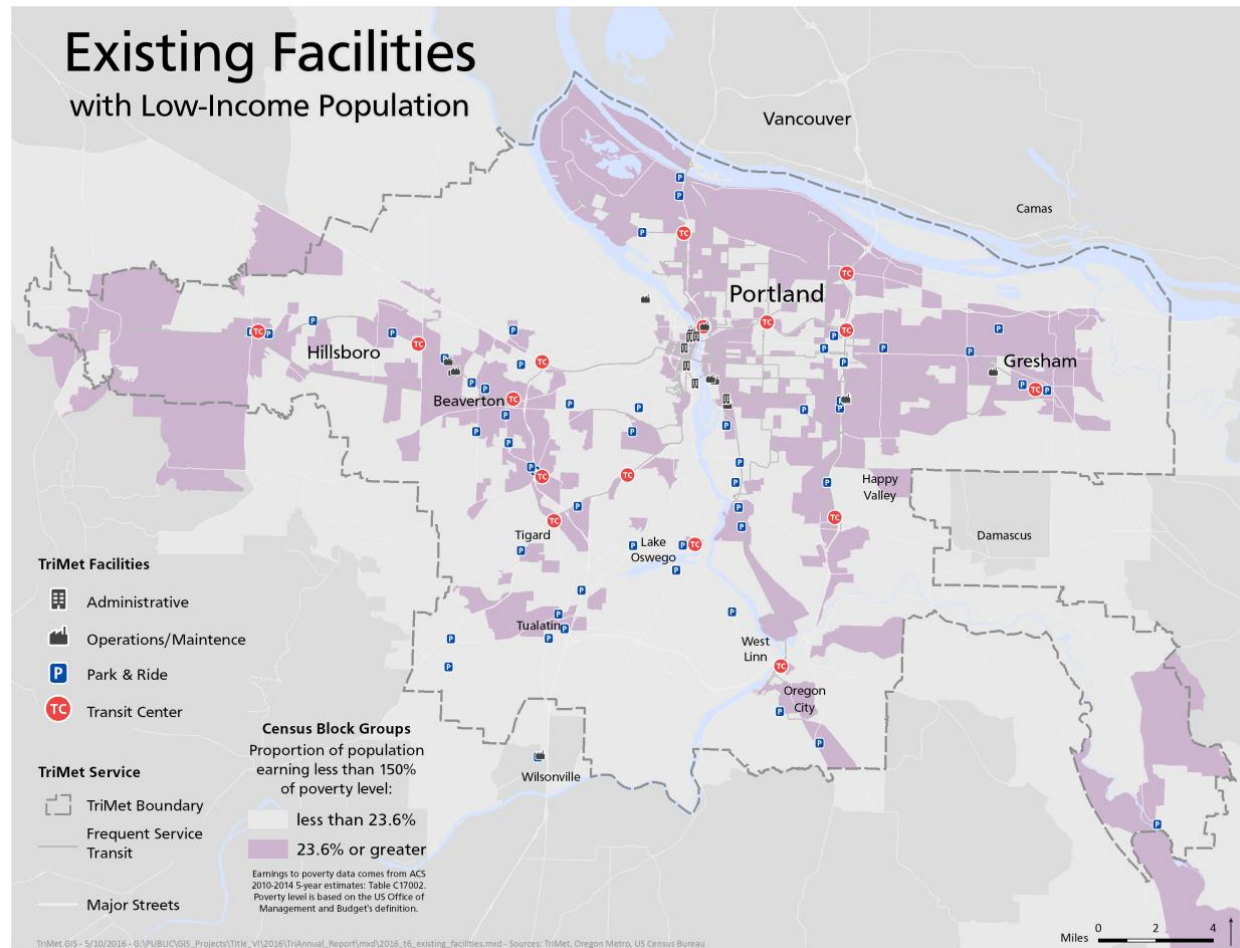


FIGURE V-21: EXISTING FACILITIES WITH LOW-INCOME POPULATION

dispersed along major rail and bus service corridors and are typically five miles or more from the Portland City Center.

AMENITIES

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

- Figure V-22 Amenity Distribution: Seating
- Figure V-23 Amenity Distribution: Digital Displays
- Figure V-24 Amenity Distribution: Elevators
- Figure V-25 Amenity Distribution: Shelters
- Figure V-26 Amenity Distribution: Signs, Maps, and/or Schedules
- Figure V-27 Amenity Distribution: Waste Receptacles

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

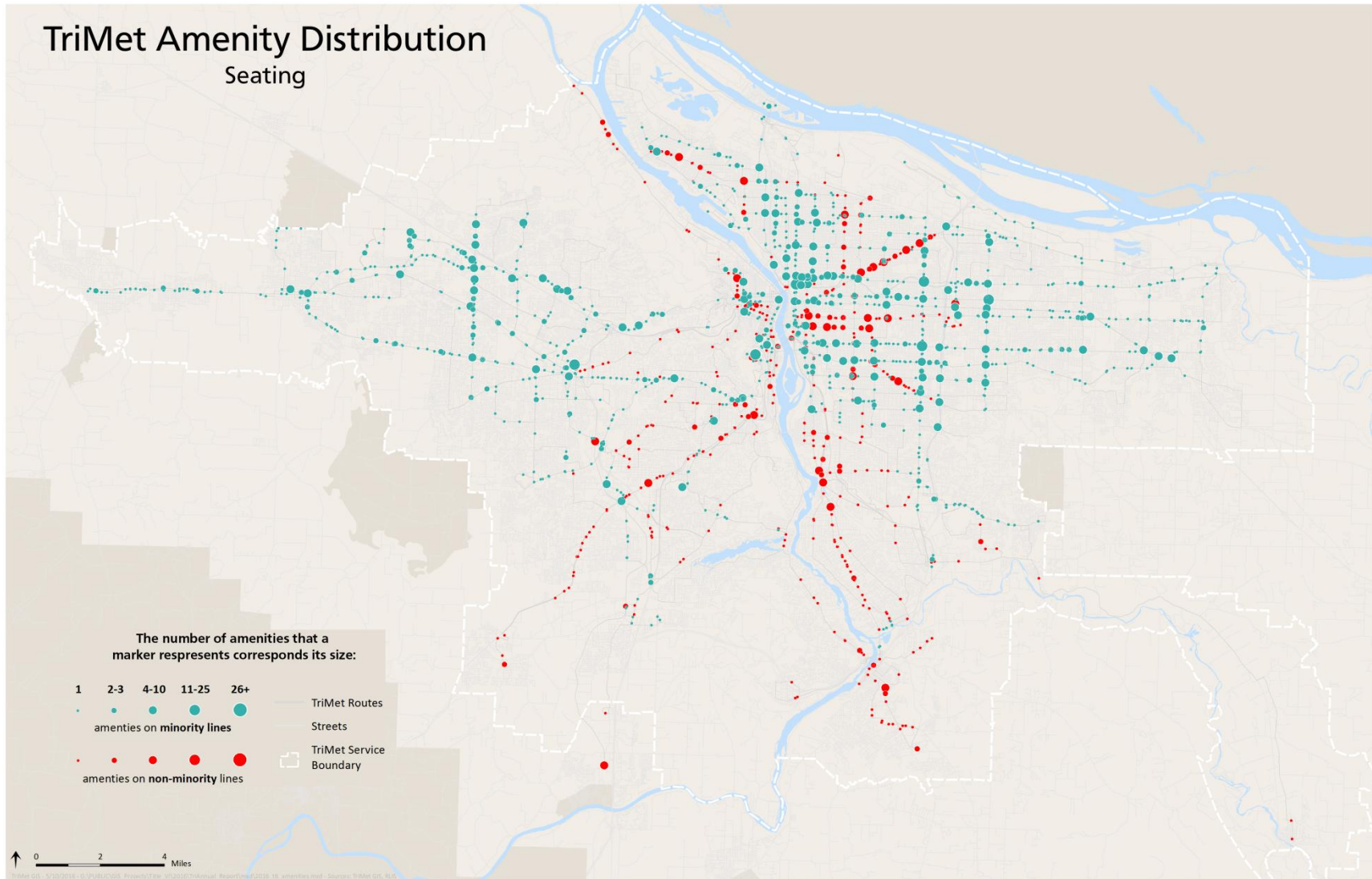


FIGURE V-22 AMENITY DISTRIBUTION: SEATING

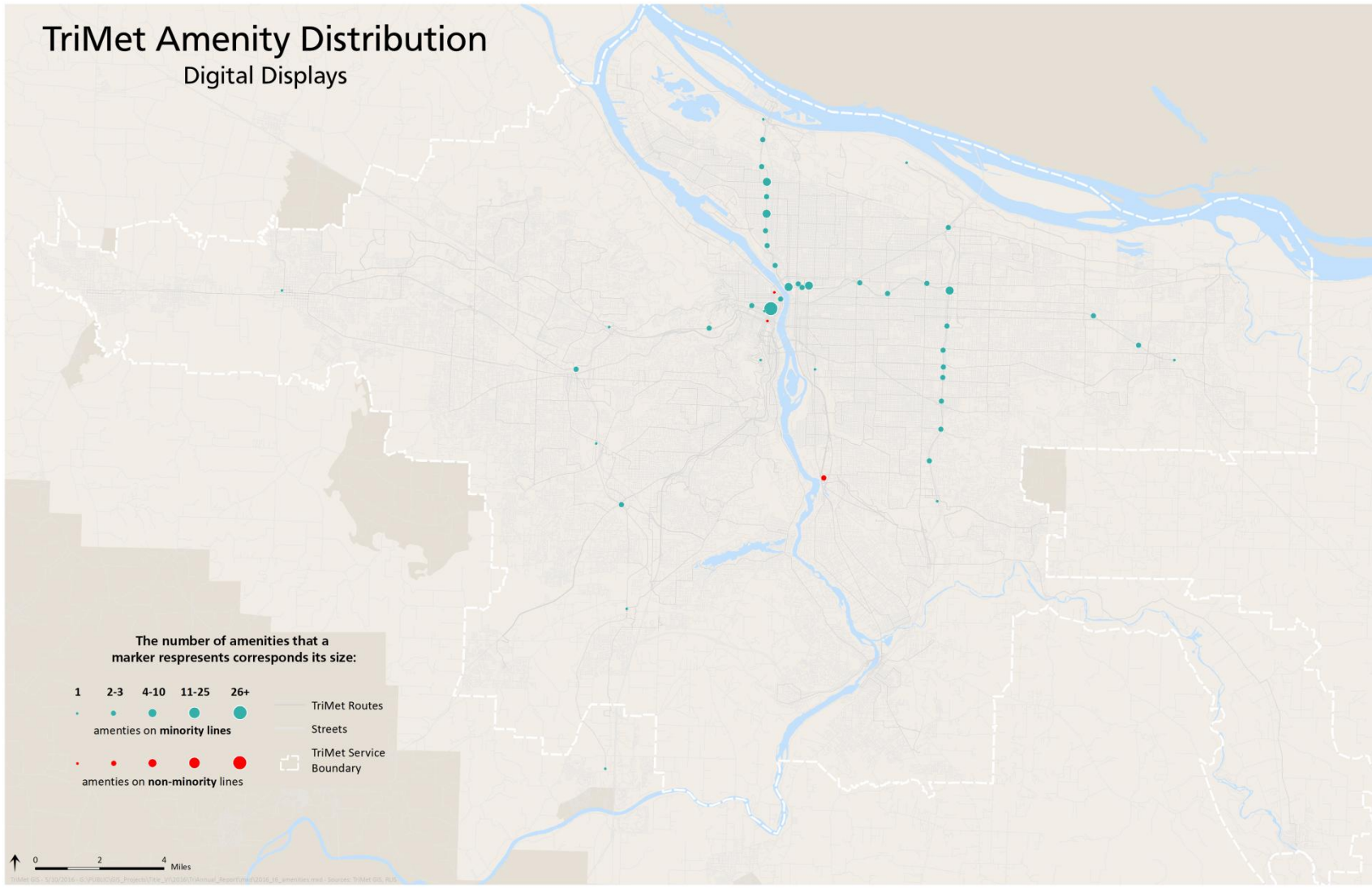


FIGURE V-23 AMENITY DISTRIBUTION: DIGITAL DISPLAYS

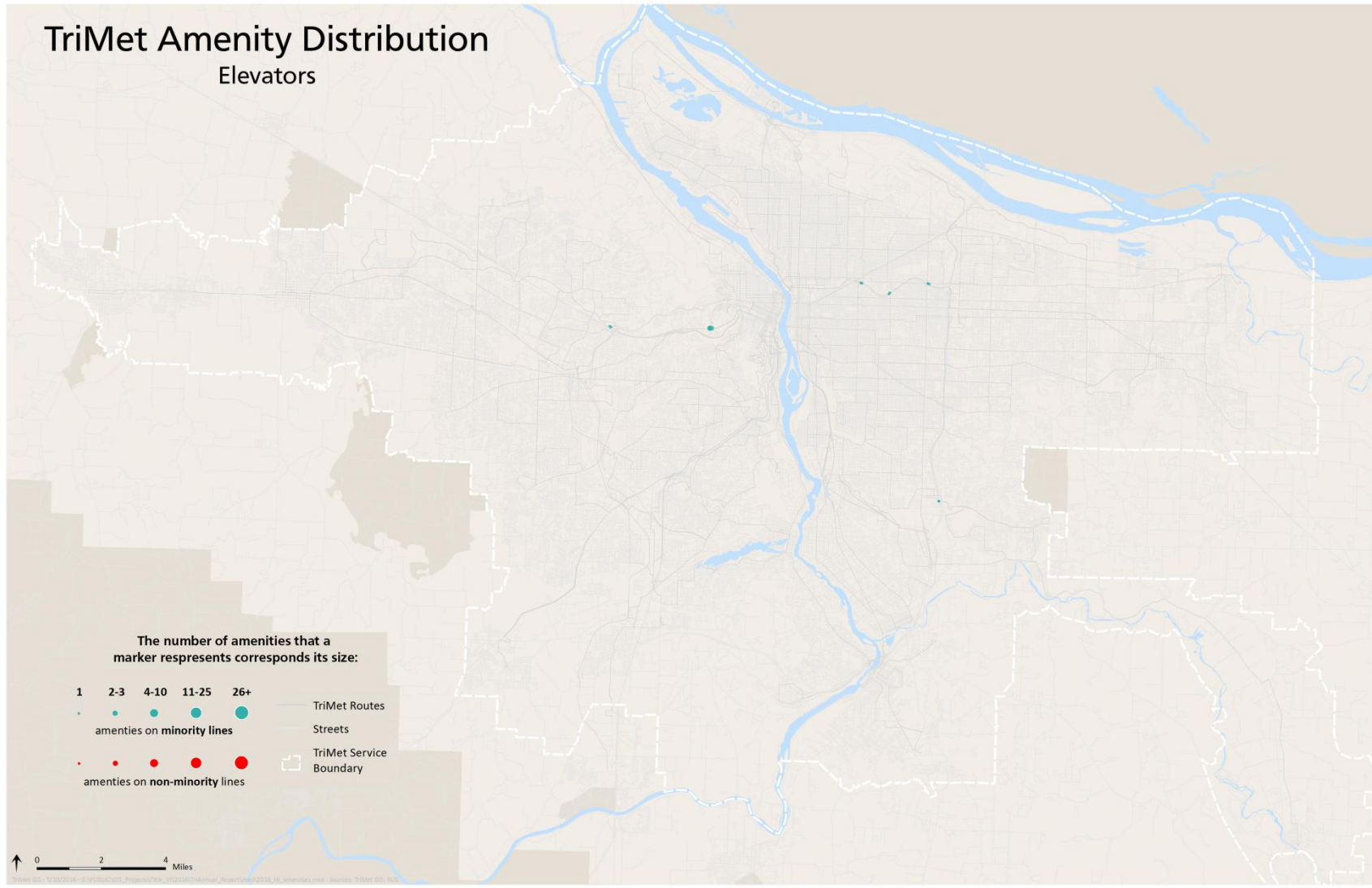


FIGURE V-24 AMENITY DISTRIBUTION: ELEVATORS

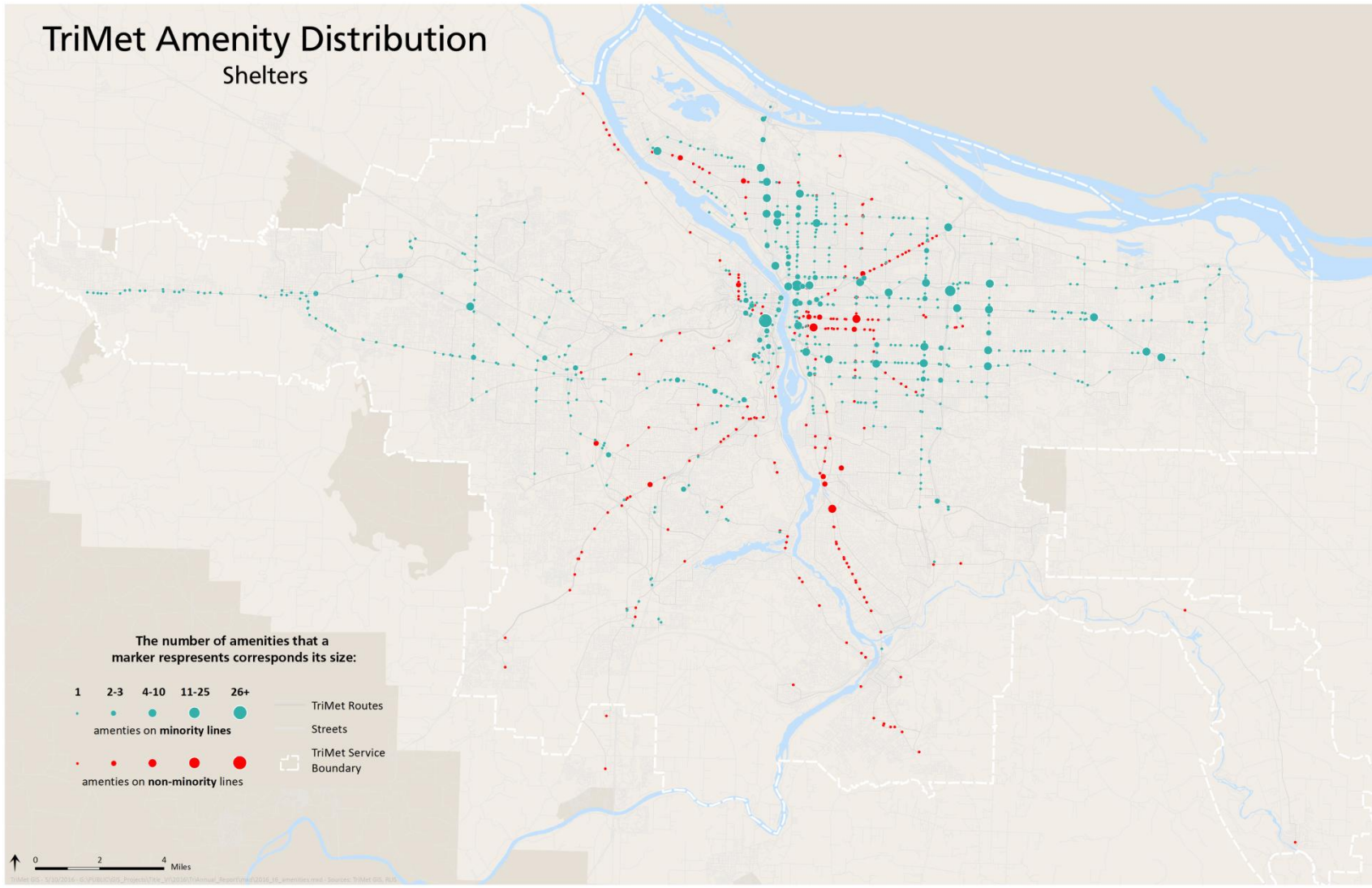


FIGURE V-25 AMENITY DISTRIBUTION: SHELTERS

TriMet Amenity Distribution

Signs, Maps, and/or Schedules

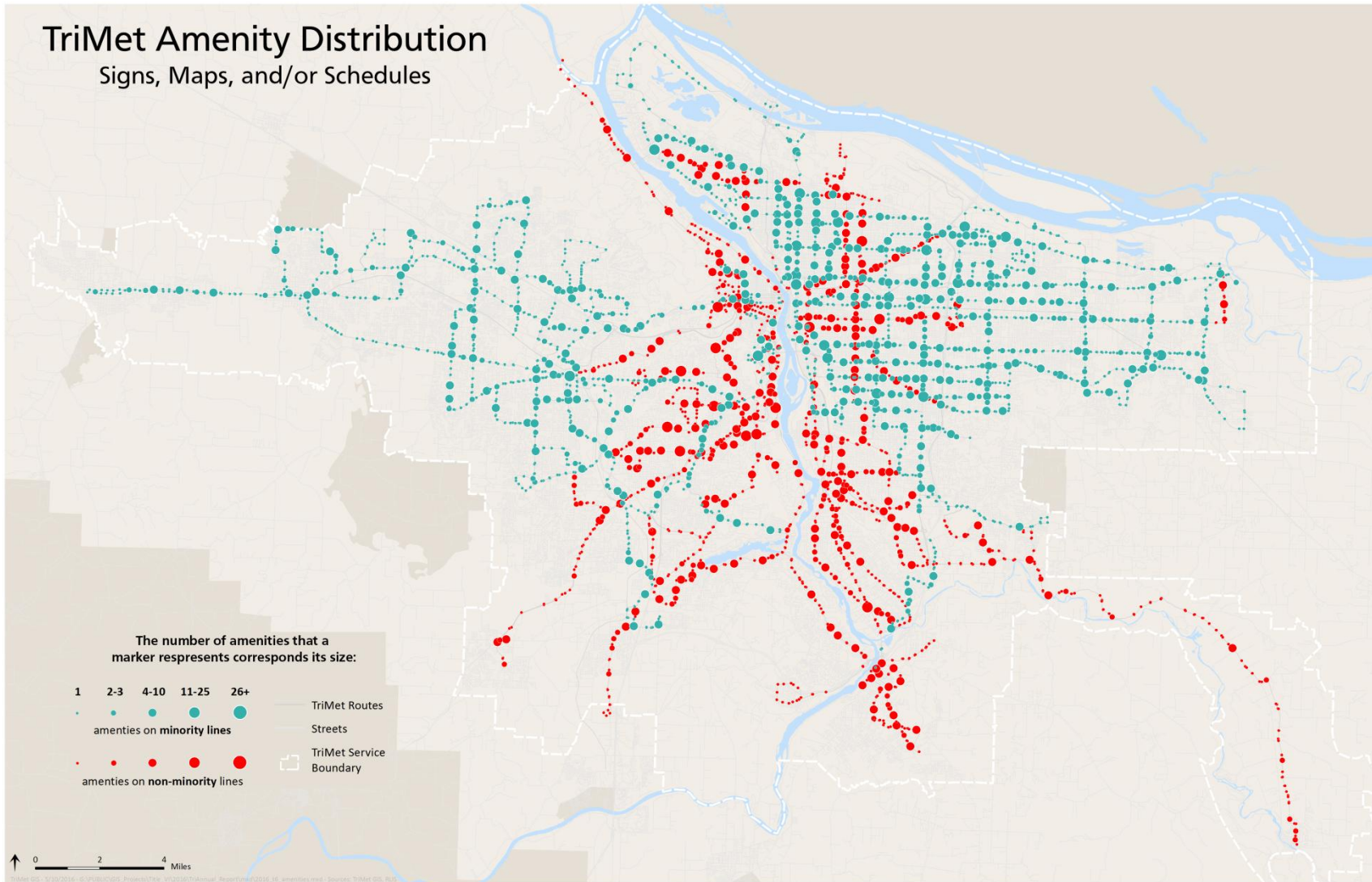


FIGURE V-26 AMENITY DISTRIBUTION: SIGNS, MAPS, AND/OR SCHEDULES

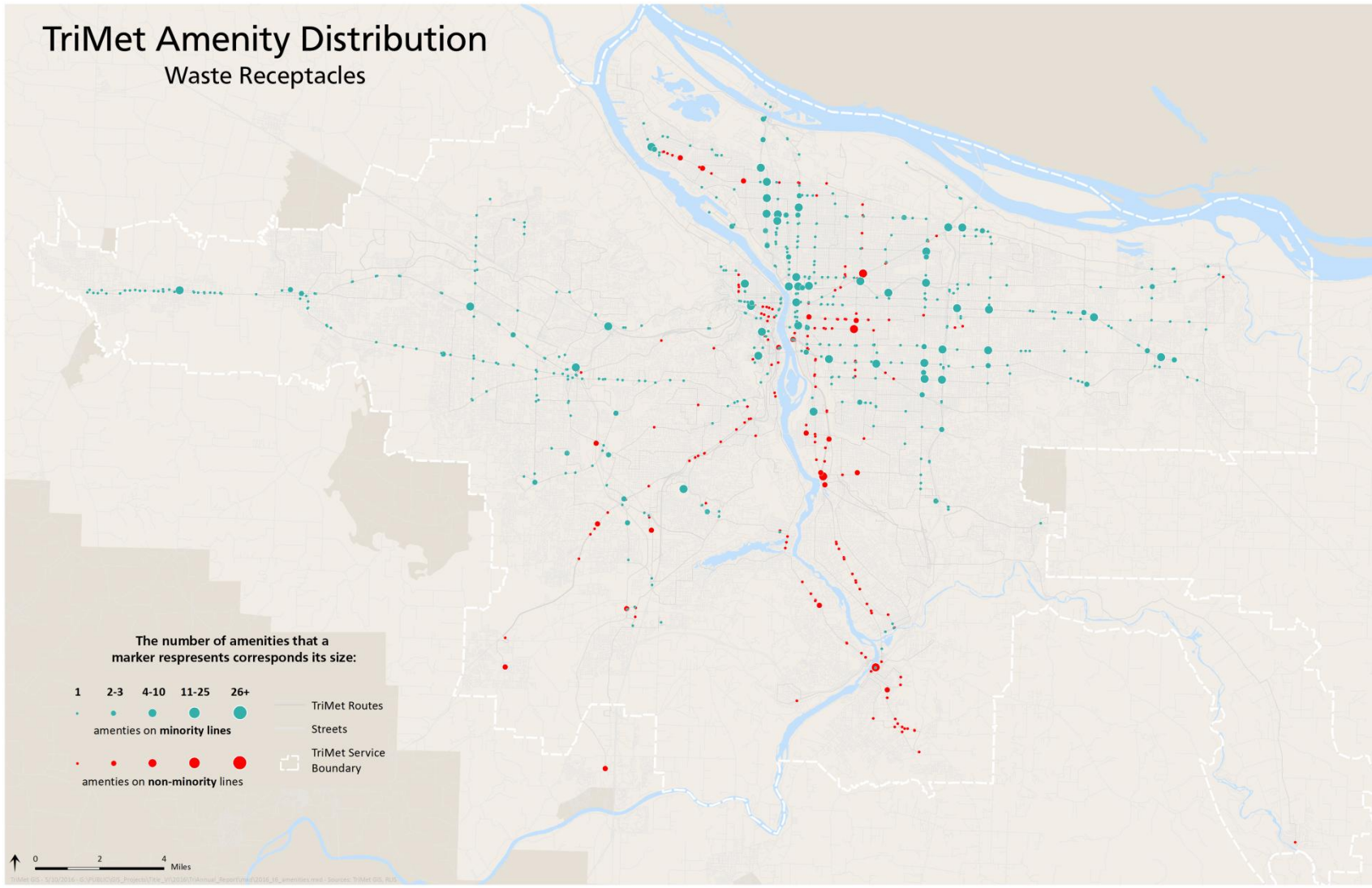


FIGURE V-27 AMENITY DISTRIBUTION: WASTE RECEPTACLES

Attachments

- A:** TriMet Board Resolution 16-09-60 Approving TriMet's Title VI Program and Policies
- B:** TriMet Title VI Complaint Form
- C:** TriMet Title VI Vehicle Notice
- D:** TriMet Public Engagement Framework
- E:** LEP Access Plan & Implementation Schedule
- F:** Portland Public Schools ESL Program Information – 2015
- G:** LIFT Facility Relocation Equity Analysis
- H:** Fall 2014 Fare and Service Change Equity Analysis, with Documentation of Board Approval
- I:** Ordinance 332 Transfer Policy Change Fare Equity Analysis, with Documentation of Board Approval
- J:** Weekend Frequent Service Restoration Equity Analysis, with Documentation of Board Approval
- K:** MAX Orange Line Startup Equity Analysis, with Documentation of Board Approval
- L:** Honored Citizen Fare Increase Equity Analysis, with Documentation of Board Approval
- M:** Title VI Fare Equity Analysis for Migration to E-Fare, with Documentation of Board Approval
- N:** Spring 2016 – Spring 2017 Service Equity Analysis, with Documentation of Board Approval
- O:** TriMet Service Guidelines Policy
- P:** Data from 2016 On-board Fare Survey
- Q:** Outreach materials for 2016 Title VI Program update