



Title VI Service Equity Analysis: FY2023 Annual Service Plan

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On Behalf Of
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Executive Summary

TriMet is proposing to implement several service changes in fall 2022 and spring 2023. In accordance with Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B, TriMet conducts a Service Equity Analysis any time Major Service Changes are proposed to ensure that changes do not unfairly impact people of color and low-income populations. The service proposal includes Major Service Changes to eight bus lines. Thus, an analysis is required prior to the TriMet Board of Directors taking action.

Methodology

TriMet's Title VI Program outlines the agency's Major Service Change, Disparate Impact, and Disproportionate Burden policies, as well as the way in which TriMet conducts Equity Analyses. Major Service Changes are analyzed for both potential adverse effects and distribution of benefits. This is done at both the individual line-level and system-level, and the analysis seeks to identify any potential disparities based on race/ethnicity or income.

Major Service Changes

The proposed changes to eight existing lines meet TriMet's established thresholds for Major Service Changes:

- New Line – TriMet FX™ (Frequent Express)
- Line 2 – Division
- Line 10 – Harold St

Findings

1. **No system level disparate impact** for the two major service increases
2. **No system level disproportionate burden** for the 2 major service increases.
3. All improvements are on lines in service areas with **above average minority populations**. As a result, a greater share of the region's minority populations stand to **benefit** as compared to non-minority populations.
4. All improvements are on lines in areas with **average-or-above low-income populations**. As a result, a greater share of the region's low-income populations stand to **benefit** as compared to higher income populations.
5. **No system level disparate impact or disproportionate burden** for the 2 major service decreases.
6. **No adverse effect** from the major service reduction (Line 10) for minority and low-income populations. The service area is below the disparate impact and disproportionate burden thresholds. Therefore, adverse effect does not apply.

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Attachment A: Analysis of impact on access to employment, education, health care, food, and parks/public recreation for minority and low-income populations.

I. Background

Dating back to 2013, TriMet and Metro sought to understand the needs and opportunities for transit and development in the Division St. corridor. For over three years, a diverse group of public, private, and community partners crafted the Powell-Division Transit and Development strategy to bring more rapid and reliable bus service to Portland and Gresham. Since January 2017, TriMet began leading project initiatives through design, construction, and operations of the forthcoming transit service. Proposed to open in fall 2022, this new high-capacity bus service will move more people faster between Downtown Portland, Southeast Portland, East Portland and Gresham. As a result, TriMet’s Annual Service Plan for FY2023¹ proposes Major Service Changes to three bus lines. The Major Service Changes presented here represent TriMet’s proposed changes for FY23.

This report documents the equity analysis conducted for these changes.

II. TriMet Title VI Compliance

As a recipient of Federal Transit Administration (“FTA”) financial assistance, TriMet must ensure that service changes – both increases and reductions – comply with Title VI of the Civil Rights Act of 1964, which states:

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

The FTA has provided specific implementing guidelines and regulations for complying with Title VI in Circular 4702.1B (“Circular”). The Circular instructs transit agencies to consider impacts of Major Service Changes on low-income populations as well as minority populations by conducting a service equity analysis. Figure 1 shows the general sequence of steps and considerations in the equity analysis process.

TriMet’s Title VI Program² outlines the agency’s policies, definitions and procedures for complying with Title VI and performing equity analyses. As required by the Circular, this includes the agency’s Major Service Change, Disparate Impact, and Disproportionate Burden policies, as set forth below.

A. Major Service Change Policy

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

¹ Fiscal year 2023 runs from July 1, 2022 to June 30, 2023.

² TriMet’s Title VI Program was updated and submitted to FTA in fall 2019

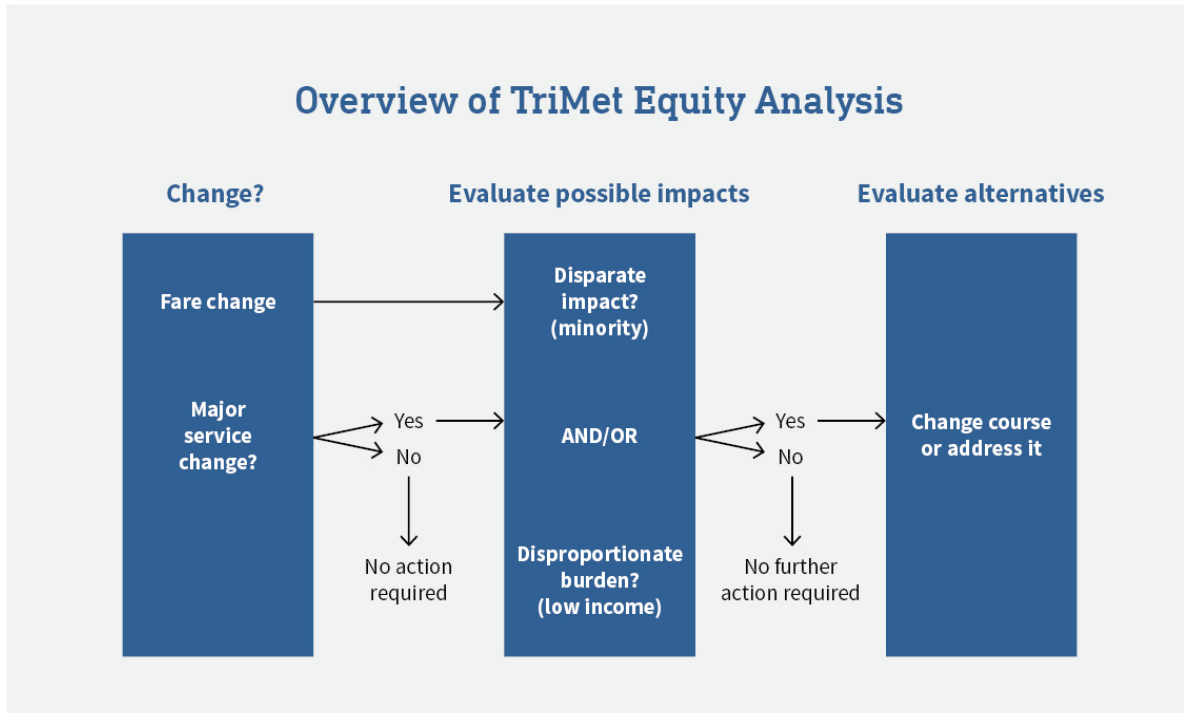


Figure 1: Overview of TriMet's Title VI Equity Analysis process

A **Major Service Change** is defined as:

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

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

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

B. Disparate Impact Policy

Testing for Disparate Impact evaluates effects on minority riders or populations as compared to non-minority riders or populations. “Minority” is defined as all persons who identify as being part of racial/ethnic groups besides white, non-Hispanic.

In the course of performing a Title VI Equity Analysis for possible disparate impact, TriMet will analyze how the proposed major service change or fare change action could impact minority populations, as compared to non-minority populations.

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

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

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

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

1. In the event of potential adverse effects resulting from service reductions:
 - a) A Major Service Change to a *single line* will be considered to have a potential Disparate Impact if the percentage of impacted minority population in the service area of the line exceeds the percentage of minority population of the TriMet District as a whole by at least 3 percentage points (e.g., 33 percent compared to 30 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., 27 percent compared to 30 percent).
 - b) To determine the *system-wide* impacts of major service change improvements on more than one line, the percentage of the TriMet district's minority population that is impacted is compared to the percentage of the TriMet district's non-minority population that is impacted. If the percentage of the minority population impacted is at least 20 percent less than the percentage of the non-minority population impacted (e.g., 8 percent compared to 10 percent), the overall impact of changes will be considered disparate.
3. Additional considerations to complement the quantitative Disparate Impact analysis above may include evaluating impacts to accessing employment, education, food, or health care for minority populations.

Upon determination of Disparate Impact, TriMet will either:

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

C. Disproportionate Burden Policy

Testing for Disproportionate Burden evaluates potential effects on low-income riders or populations, defined as at or below 150% of the federal poverty level. The line and system level evaluations are identical to those used to determine potential Disparate Impacts, but compare low-income and higher income populations rather than minority and non-minority populations.

III. Proposed Service Changes

A. Description of Changes

Table 1 lists the proposed service changes by the quarter in which they would take effect. A majority of the changes proposed for the next year are service increases. However, one of the proposed changes

Table 1: Proposed Service Changes in FY 2023 Annual Service Plan

Quarter	Line	Service Change Description
Fall 2022	New Line – TriMet FX™	<ul style="list-style-type: none"> ➤ New Transit Line (FX 2 – Division) ➤ Increase weekday and weekend frequency
	Line 2 – Division	<ul style="list-style-type: none"> ➤ Replaced with FX 2 – Division ➤ Remove service from segment of SE 7th Ave
Spring 2023	Line 10 – Harold St	<ul style="list-style-type: none"> ➤ Remove service from segment of SE Ladd Ave ➤ Replace Line 2 service (SE 7th Ave segment) ➤ Add weekend service ➤ Add later trips during the weekday ➤ Increase weekday frequency

B. Major Service Change Test

To determine whether individual service changes meet the definition of Major Service Change, current and proposed service are compared in terms of route length, frequency, and span (hours) of service. Changes of 15% or more qualify as Major Service Changes, including changes meeting this threshold cumulatively over the course of three years.

Results of the comparison are shown in Table 2. To summarize, these changes meet TriMet’s adopted Title VI Major Service Change definition:

FX 2 – Division: New Transit Line

Line 2 – Division: Retire Line

Line 10 – Harold St: Re-route, Frequency increase over 15% on weekdays, span increase over 15% on weekdays, and span increase over 15% on weekends

Table 2: Results of Major Service Change Test By Line

Line	Change in Route Length	Change in Span	Change in Frequency	Line Split	Retired Line	New Line or New Service
New Line - FX 2						✓
Line 2 - Division					✓	
Line 10 - Harold St.	*		+15%			
Line 10 - Harold St. (Saturday)						✓
Line 10 - Harold St. (Sunday)						✓

*Includes routing changes where route miles are neither increased nor reduced (i.e., re-routes)

C. Line-level Analyses

Having identified the service changes which meet the definition of Major Service Change, the next step in the analysis is to look at each line individually to determine potential Disparate Impacts (minority populations) and/or Disproportionate Burdens (low-income populations). Both service reductions and service increases are analyzed. For service increases, the analysis examines the extent to which the *benefits* of the improvements are inclusive of minority and low-income populations. The line-level analysis compares minority and low-income populations for the service area of each line proposed for a Major Service Change to the minority and low-income populations of the TriMet District as a whole. The analysis is separated by type of service change being proposed:

1. **Major Service Reduction**
2. **Major Service Increases**
3. **Other Major Service Changes**

1. Major Service Reduction

For service reductions, the analysis examines whether *adverse effects* (defined on pg. 3) are disproportionately borne by minority or low-income populations. If *adverse effects* are identified and a line's minority and/or low-income populations are at least 3 percentage points greater than the minority or low-income populations for the TriMet District as a whole, the proposed change is flagged as a potential Disparate Impact or Disproportionate Burden.

The proposal includes two Major Service Reductions in this service plan.

➤ *Line 2 (Route retirement)*

The retirement of this line would potentially burden a service area population that is 34% minority and 28% low-income, which are both above the Disparate Impact (33%) and Disproportionate Burden (21%) thresholds for Major Service Decreases. Although flagged in Figures 2 and 3, there is no potential Disparate Impact or Disproportionate Burden at the line-level since the implementation of FX 2 will result in the replacement of existing bus service provided by Line 2, with the exception of SE 7th Avenue.

Currently, the Line 2 travels from SE Division Street to SE Hawthorne Street using SE 7th Avenue to reach the Hawthorne Bridge as the main Willamette River Crossing. The new and improved FX 2-Division will use Tilikum Crossing instead of Hawthorne Bridge and will therefore remove current bus service on SE 7th Avenue between SE Division Street and SE Hawthorne Street. The surrounding area on 7th Avenue has a higher-than-average concentration of low-income residents (36%) compared to the TriMet service district average (18%). To minimize the potential adverse impact to low-income populations the Line 10 will move from SE Ladd Ave to SE 7th Ave to provide service previously served by Line 2. It does not have a higher-than-average concentration of minority residents (15%) compared to the TriMet service district average (30%). Therefore, adverse impact for minority residents does not apply.

➤ *Line 10 (Route realignment, including stop removals)*

The Line 10 includes one route change moving from SE Ladd to SE 7th Ave. Doing so would remove Line 10 service from a total of 11 stops, including both directions of service. As shown in Figures 2 and 3, the population in the surrounding areas are below the Disparate Impact threshold (33%) and below the

Disproportionate Burden for Major Service Reductions. Thus, this change is not flagged for potential line-level Disparate Impact or Disproportionate Burden. As shown in Table 3, four out of the 11 stops will not have comparable service within ¼ mile; however, there is not a Disparate Impact or Disproportionate Burden because the populations in these areas are below the threshold (33% and 21%, respectively); therefore, adverse effect does not apply.

	No. of Stops	Total daily ons/off (weekdays)	Pct. Population Minority	Pct. Population Low-Income
Service Removed	11	220	13%	7%
<i>Nearest comparable service</i>				
Less than ¼ mile	7	147	N/A	N/A
Over ¼ mile*	4	73	N/A	N/A

*Adverse effect applies

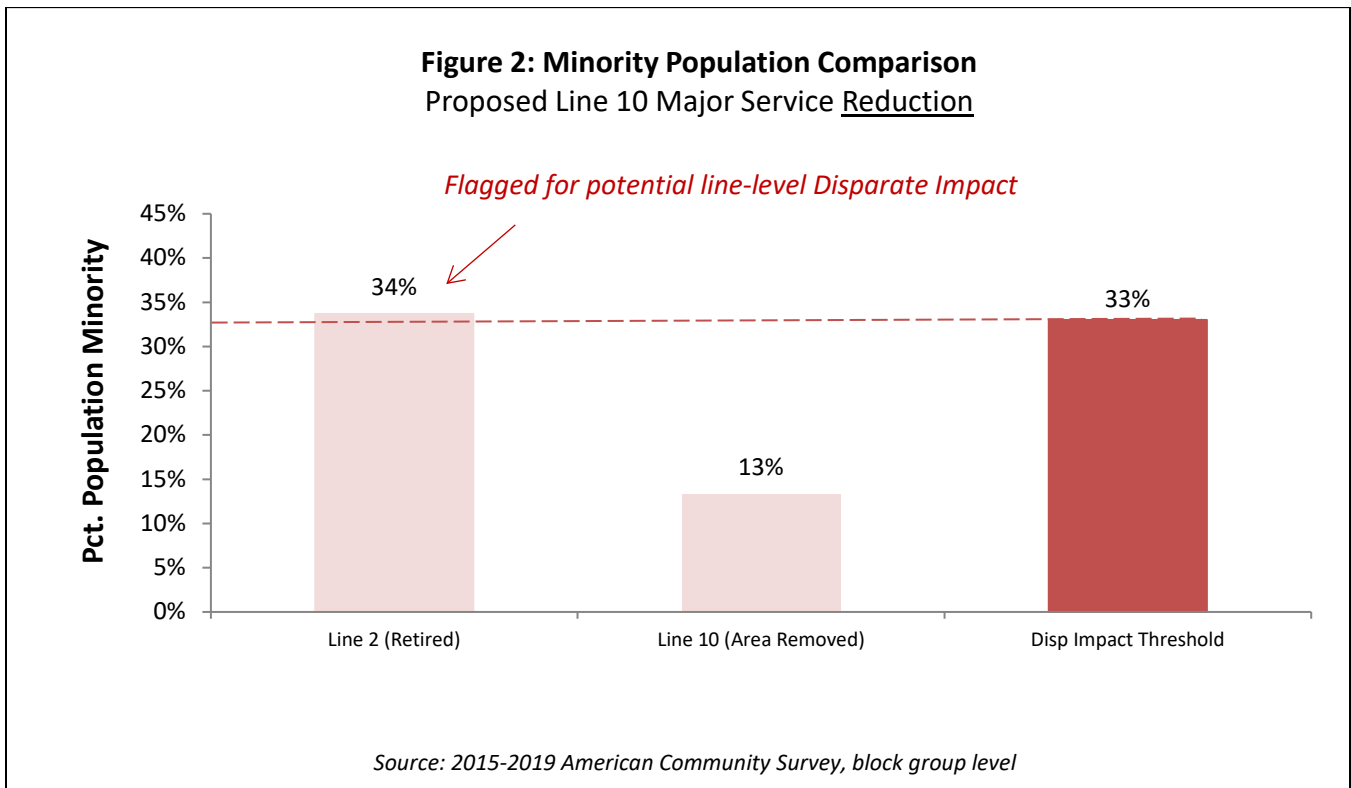
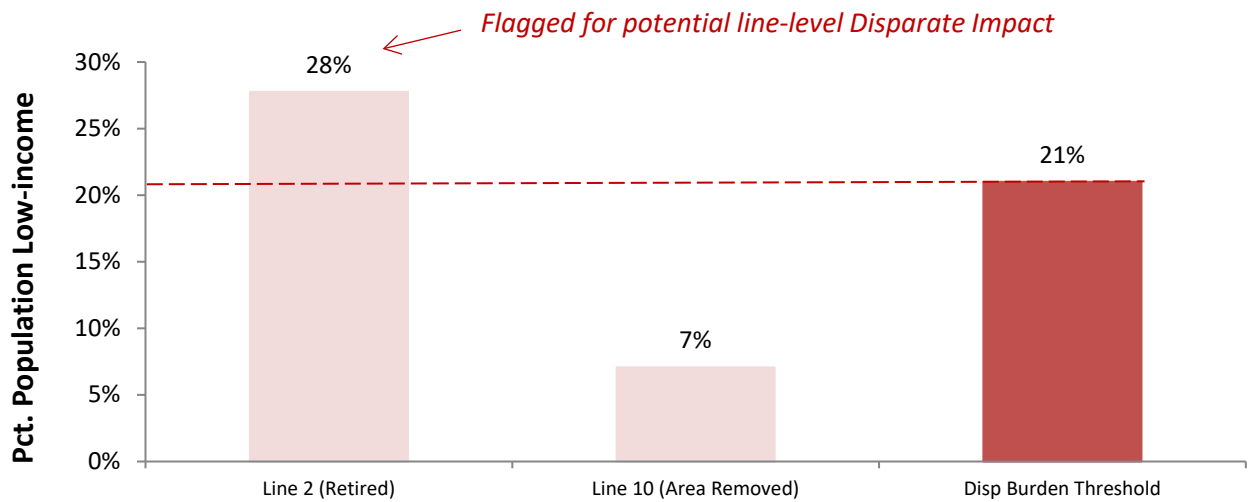


Figure 3: Low-income Population Comparison
Proposed Line 10 Major Service Reduction



Source: 2015-2019 American Community Survey, block group level. Low-income defined as at or below 150% federal poverty level.

In terms of access³, this change would remove service from the Line 10 (SE Ladd) to:

- About 14,751 jobs
 - 48% are low-to-medium wage jobs, which is above the TriMet district average
 - 18% are jobs held by minorities, which is above the TriMet district average
 - 12% are jobs held by Hisp./Latino workers, which is above the TriMet district average

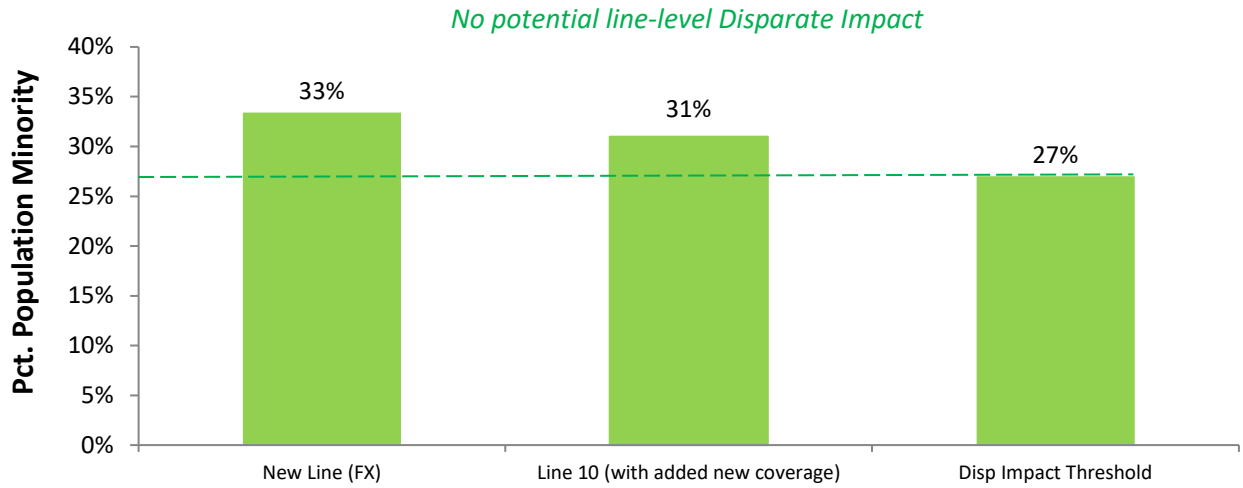
2. Major Service Increases

For service increases, the analysis examines the extent to which the *benefits* of the improvements are inclusive of minority and low-income populations.

Figure 4 displays the minority population along each line proposed for a major increase as compared to the 27% Disparate Impact threshold. Figure 5 displays the low-income population along each line as compared to the 15% Disproportionate Burden threshold. Because these are proposed service increases, protected populations *falling below* these thresholds are flagged for potential concerns. The narrative analysis of each individual line follows, which includes further considerations of access to jobs, education, health care, food and parks/public recreation for minority and low-income populations.

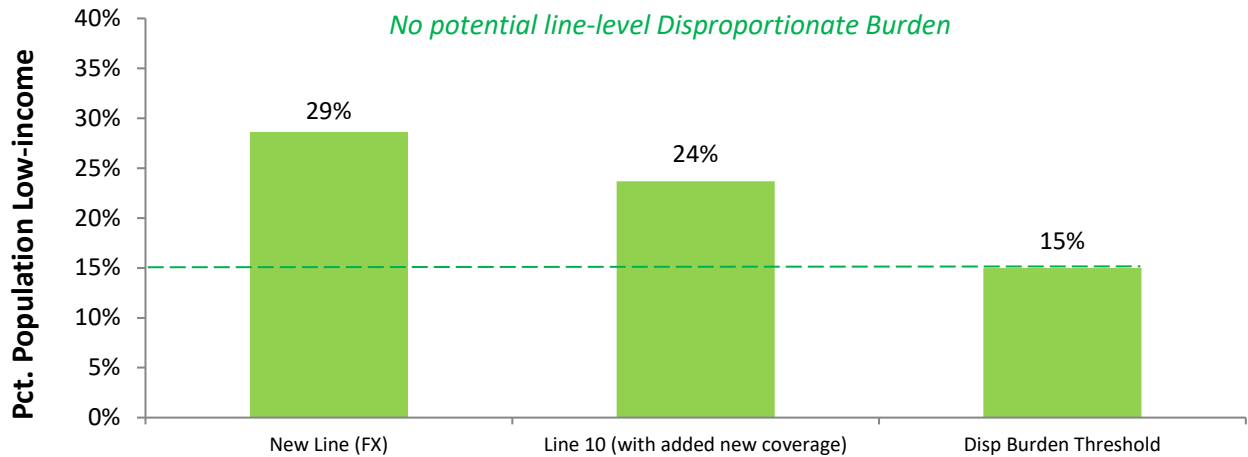
³ Access defined as within ¼ mile of a stop on the line. For full details of access to services by line, see Attachment A.

Figure 4: Minority Population Comparison
 Lines with proposed Major Service Increases & Disparate Impact Threshold



Source: 2015-2019 American Community Survey, block group level

Figure 5: Low-income Population Comparison
 Lines with proposed Major Service Increases & Disproportionate Burden Threshold



Source: 2015-2019 American Community Survey, block group level. Low-income defined as at or below 150% federal poverty level.

➤ ***New Line – FX 2 - Division (New bus line)***

The new bus line will replace and vastly improve service from the Line 2 between Downtown Portland and the Cleveland Ave Park & Ride in Gresham. As shown in Figure 4, the proposed routing for this new line would potentially benefit a service area population that is **33% minority**, which is above the Disproportionate Burden threshold (27%) for Major Service Increases. The service area population is **29% low-income**, which is above the Disproportionate Burden threshold (15%) for Major Service Increases. Thus, there is **no potential Disparate Impact or Disproportionate Burden** at the line-level.

In terms of access, this new line would improve service to:

- About 111,008 jobs
 - 37% are low-to-medium wage jobs, which is below the TriMet district average
 - 16% are jobs held by minorities, which is similar to the TriMet district average
 - 8% are jobs held by Hisp/Latino workers, which is similar to the TriMet district average
- 21 grocery store/supermarket
- 317 human and social service centers
- 4 colleges/universities
- 6 high schools and 3 middle schools
- 80 employment resource centers
- 7 parks and recreation

In terms of access, this line would provide new service to:

- About 46,744 jobs
 - 28% are low-to-medium wage jobs, which is below the TriMet district average
 - 16% are jobs held by minorities, which is similar to the TriMet district average
 - 7% are jobs held by Hisp./Latino workers, which is below the TriMet district average
- 2 grocery stores/supermarkets
- 19 human and social service centers
- 2 colleges/universities
- 1 high school
- 44 employment resource centers
- 1 park

➤ ***Line 10 – Harold St (Route change, New weekend service, and Weekday frequency increase)***

This proposed route change maintain service for Line 2 riders on SE 7th Ave. The service increases to the Line 10 would potentially benefit a service area population that is **31% minority**, which is above the Disparate Impact threshold (27%) for Major Service Increases. The service area population is **24% low-income**, which is above the Disproportionate Burden threshold (15%) for Major Service Increases. Thus, there is **no potential Disparate Impact or Disproportionate Burden** at the line-level.

In terms of access, this line change would improve service to:

- About 57,689 jobs
 - 38% are low-to-medium wage jobs, which is below the TriMet district average
 - 15% are jobs held by minorities, which is below the TriMet district average
 - 9% are jobs held by Hisp/Latino workers, which is below the TriMet district average

- 6 grocery stores/supermarkets
- 141 human and social service centers
- 2 colleges/universities
- 4 high schools and 2 middle schools
- 63 employment resource centers
- 8 parks and recreation

In terms of access, this line would maintain service from the Line 2 to:

- About 32,504 jobs
 - 34% are low-to-medium wage jobs, which is below the TriMet district average
 - 15% are jobs held by minorities, which is below the TriMet district average
 - 8% are jobs held by Hisp./Latino workers, which is below the TriMet district average
- 1 grocery store/supermarket
- 13 human and social service centers
- 2 colleges/universities
- 51 employment resource centers

3. Other Major Service Changes

There are no Other Major Service Changes

D. System-level Analysis

Because more than one line is proposed for a Major Service Change, a system-level analysis is required in addition to the line-level analysis. The system-level analysis aims to measure impacts of all Major Service Changes combined to determine how equitable the impacts would be across racial/ethnic and economic lines. Service increases and service reductions are analyzed separately in order to examine both potential system-level *adverse effects* and distribution of *benefits*.

➤ *System-level Disparate Impact Analysis: Major Service Increases*

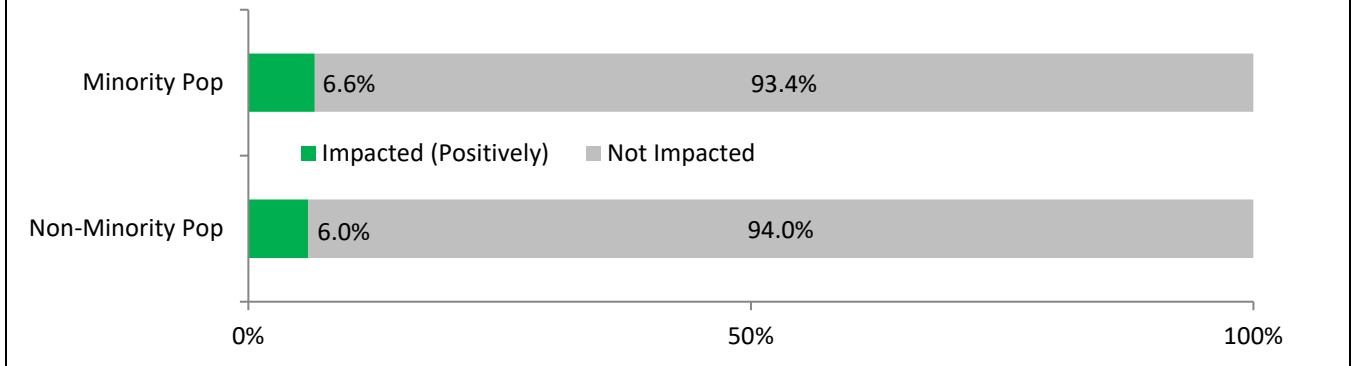
The system-level Disparate Impact analysis of Major Service Increases is completed by determining what portion of the TriMet District's minority population stands to benefit from the Major Service Change improvements, and comparing that to the portion of the District's non-minority population that potentially benefits. A potential Disparate Impact would exist if minority populations benefitted substantially less than non-minority populations. The way we measure this is to test whether 20% less (or 4/5) of the District's minority than non-minority population stood to benefit from the improvements.

Table 4 and Figure 6 compare the positively impacted minority and non-minority populations. A slightly higher percentage of the District's minority population stands to benefit by the proposed Major Service Increase compared to the non-minority population (6.6% vs. 6.0%, respectively). Therefore, *no System-level Disparate Impact* is found related to the proposed Major Service Increases.

Table 4: System-level Disparate Impact Analysis of Major Service Increases

Pct. of TriMet District Non-Minority Pop Positively Impacted	Minority Pop Disparate Impact Threshold	Pct. of TriMet District Minority Pop Positively Impacted	Potential Disparate Impact?
6%	Less than 4.8%	6.6%	No

**Figure 6: System-level Impacts of Proposed FY23 Major Service Improvements
Minority and Non-minority Populations**



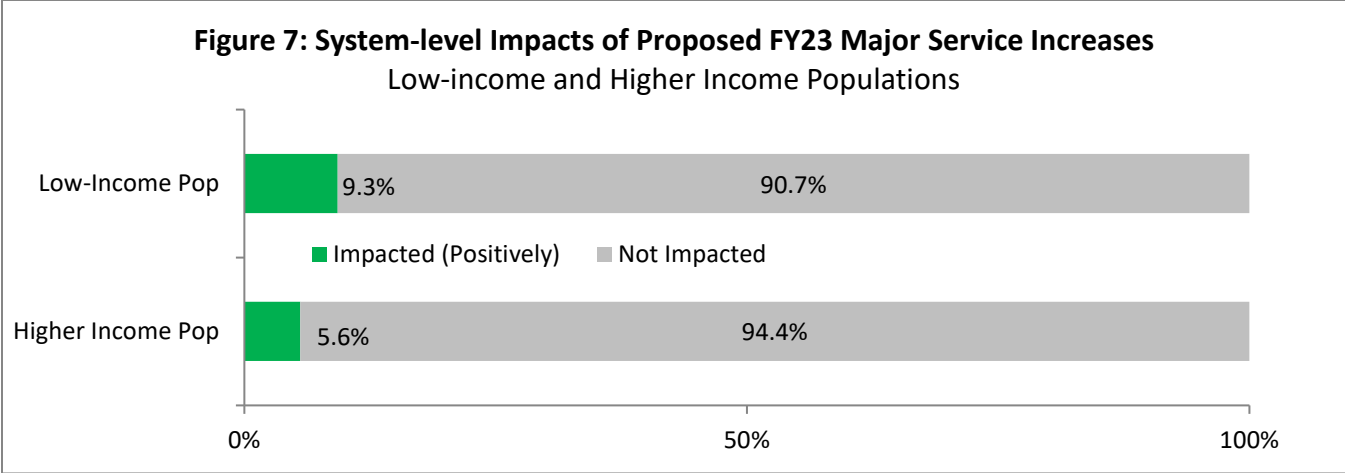
➤ **System-level Disproportionate Burden Analysis: Major Service Increases**

The System-level Disproportionate Burden analysis is completed by determining what proportion of the TriMet District’s low-income population is positively impacted by the Major Service Increases, and comparing that to the District’s higher income population that is positively impacted. “Higher income” includes all persons above the low-income threshold of 150% of the federal poverty level. A potential Disproportionate Burden would exist if low-income populations benefitted substantially less than higher income populations. The way we measure this is to test whether 20% less (or 4/5) of the District’s low-income than higher income population stands to benefit from the improvements.

Table 5 and Figure 7 compare the impacted low-income and higher income populations. A greater percentage of the District’s low-income population stands to benefit from the proposed Major Service Increases as compared to the higher income population (9.3% vs. 5.6%, respectively). Therefore, **no System-level Disproportionate Burden** is found related to the proposed Major Service Increases.

Table 5: System-level Disproportionate Burden Analysis of Major Service Increases

Pct. of TriMet District Higher Income Pop Positively Impacted	Low-Income Pop Disparate Impact Threshold	Pct. of TriMet District Low Income Pop Positively Impacted	Potential Disproportionate Burden?
5.6%	Less than 4.5%	9.3%	No



➤ **System-level Disparate Impact Analysis: Major Service Reductions**

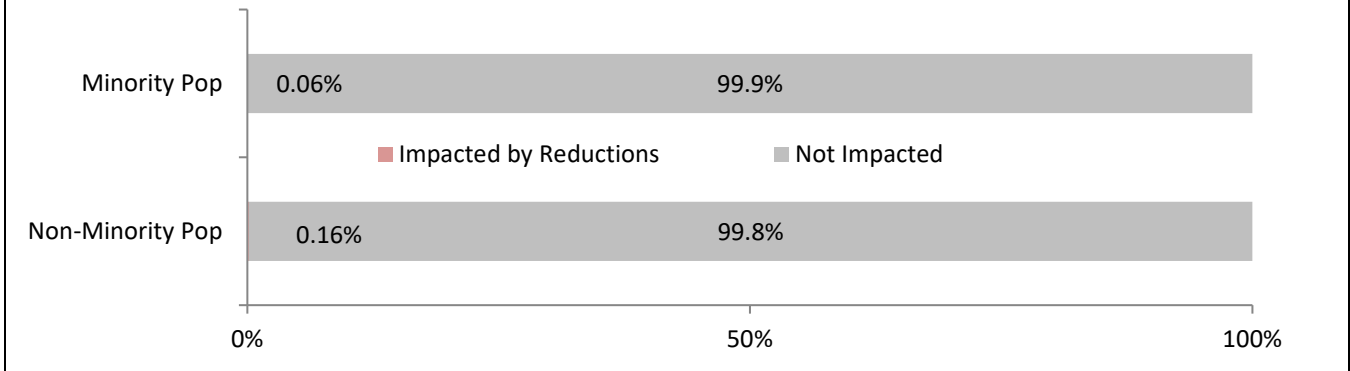
The system-level Disparate Impact analysis of Major Service Reductions is completed by determining what proportion of the TriMet District’s minority population is potentially adversely impacted from the service reductions and comparing that to the District’s non-minority population that may be adversely impacted. A potential Disparate Impact would exist if minority populations were impacted substantially more by service reductions than non-minority populations. The way we measure this is to test whether 20% more of the District’s minority than non-minority population were impacted by the service reductions.

Table 6 and Figure 8 compare the impacted minority and non-minority populations. A greater percentage of the District’s non-minority population is potentially impacted by the proposed Major Service Reductions as compared to the minority population (0.06% vs. 0.16%, respectively). Therefore, ***no system-level Disparate Impact is found related to the proposed Major Service Reductions.***

Table 7: System-level Disparate Impact Analysis of Major Service Decreases

Pct. of TriMet District Non-Minority Pop Negatively Impacted	Minority Pop Disparate Impact Threshold	Pct. of TriMet District Minority Pop Negatively Impacted	Potential Disparate Impact?
0.16%	More than 0.2%	0.06%	No

**Figure 8: System-level impacts of proposed FY23 Major Service Reductions
Minority and Non-minority Populations**



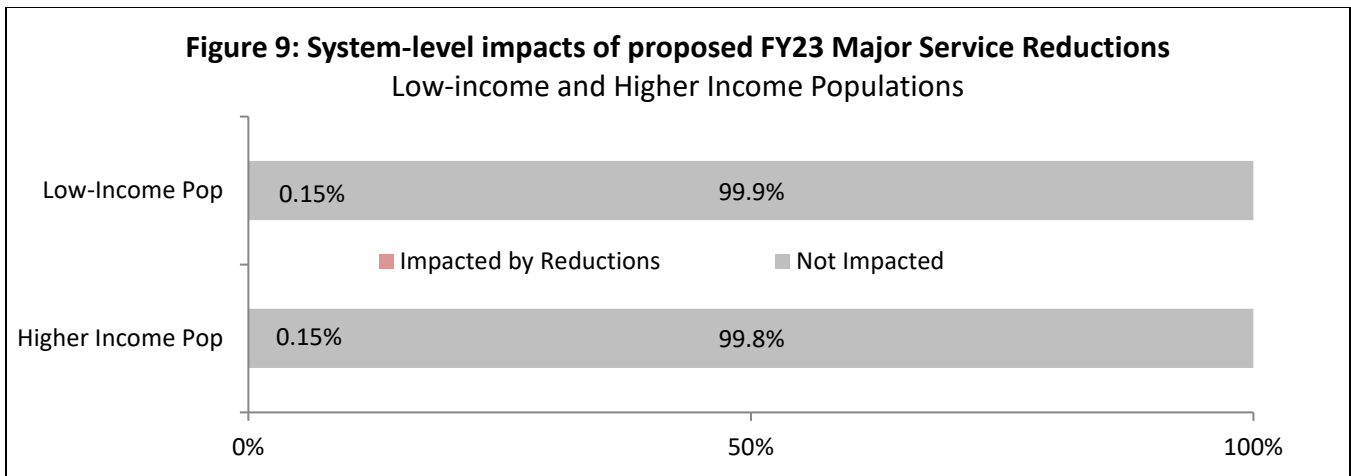
➤ ***System-level Disproportionate Burden Analysis: Major Service Reductions***

The system-level Disproportionate Burden analysis is completed by determining what proportion of the TriMet District’s low-income population is potentially adversely impacted from the service reductions and comparing that to the District’s higher income population that may be adversely impacted. “Higher income” includes all persons above the low-income threshold of 150% of the federal poverty level. A potential Disproportionate Burden would exist if low-income populations were impacted substantially more by service reductions than higher income populations. The way we measure this is to test whether 20% more of the District’s low-income than higher income population were impacted by the service reductions.

Table 7 and Figure 9 compare the impacted low-income and higher income populations. The District’s low-income and higher income population will be potentially impacted by the proposed Major Service Reductions similarly (0.15% vs. 0.15%, respectively). Therefore, ***no system-level Disproportionate Burden is found related to the proposed Major Service Reductions.***

Table 7: System-level Disproportionate Burden Analysis of Major Service Decreases

Pct. of TriMet District Higher Income Pop Negatively Impacted	Low-Income Pop Disparate Impact Threshold	Pct. of TriMet District Low Income Pop Negatively Impacted	Potential Disproportionate Burden?
0.15%	More than 0.18%	0.15%	No



IV. Community Engagement

An initial FY23 service change outreach plan was developed in fall 2021, at which point TriMet posted the proposed changes on trimet.org to solicit feedback, placed advertisements in newspapers across the service district, sent stakeholder and rider communications via email, social media and direct conversation posted signs at bus stops and sent postcards with language translations (Spanish) to nearby residents of lines with proposed routing changes, presented the proposal to the Transit Equity Advisory Committee, sent emails to riders and other stakeholders, and staff held two TriMet Virtual Open Houses in English and Spanish on October 27th and October 28th, respectively.

Outreach was also conducted to communities with limited English proficiency via TriMet’s multicultural outreach engagement contract. TriMet identified the top 5 languages spoken per bus line as Chinese, Vietnamese, Khmer, Spanish, Ukrainian, Russian, and Tagalog. These organizations were identified due to the communities they work with, language assistance provided, and their location. All were based in southeast Portland. Two organizations supported outreach – APANO and Slavic Community Center of NW (Slavic Family). APANO conducted outreach to Vietnamese, Chinese speakers and Slavic Family with Ukrainian, and Russian speakers affected by the proposed service plan. The outreach activities promotion of FY23 via contractor’s website, newsletter, social media, and other mediums, recruiting 10 community members per language to provide feedback for the service changes, and coordinating and hosting language specific open houses on November 4th, 8th, 10th and 11th with TriMet staff present.

Based on feedback received, TriMet modified the plan by:

1. Removing the proposed change (no longer serve Glenn Otto Park) to Line 80

For the second phase of outreach, TriMet held one virtual open house on February 8th 2022 to solicit feedback about any updates to the proposal. Many elements of the initial outreach phase were repeated (postcards, newspaper advertisements, emails). Outreach to communities with limited English proficiency continued as TriMet contracted with APANO, Slavic Community Center of NW (Slavic Family), and Latino Network. APANO and Slavic Family were tasked with conducting outreach in the same languages as the first round outreach

and Latino Network with Spanish speakers affected by the proposed service plan. Due to the limited geography of the service plan, the organizations outreach included promotion of FY23 via their website, newsletter, social media, and other mediums.

Finally, TriMet will hold a public hearing at its March 23, 2022 board meeting to receive comments on the proposed service changes.

The following is a summary of themes across the feedback received: *[This section will be completed once all public input is reviewed and the TriMet board of directors has been made aware and considered this service proposal and equity analysis.]*

V. Summary of Findings

Table 8 on the next page summarizes the results of the line-level and system-level Disparate Impact and Disproportionate Burden analyses. As shown, there are no disparate impacts or disproportionate burdens with the service increases portion of the proposed FY23 Annual Service Plan. That is, the proposed improvements (new FX 2 and Line 10) did not have any line-level and system-level impacts and will significantly improve service for minority and low-income populations.

The proposed route retirement of the Line 2 does not result in a potential Disparate Impact or Disproportionate Burden at the line-level since the implementation of FX 2 will result in the replacement and improvement of existing bus service provided by Line 2, with the exception of SE 7th Avenue. The surrounding area on 7th Avenue has a higher-than-average concentration of low-income residents (36%) compared to the TriMet service district average (18%). To minimize the potential adverse impact to low-income populations the Line 10 will move from SE Ladd Ave to SE 7th Ave to provide service previously served by Line 2. It does not have a higher-than-average concentration of minority residents (15%) compared to the TriMet service district average (30%). Therefore, adverse impact for minority residents does not apply.

The proposed service reduction (to the Line 10) also does not appear to create disproportionate and adverse effects given the low concentrations of minority and low-income populations potentially impacted. Overall, reducing service on two lines does not raise concerns of an inequitable distribution of burdens for minority and low-income populations given the results of the line-level and system-level analysis.

Table 8: Summary of Disparate Impact and Disproportionate Burden Analysis Results

		Potential Disparate Impact?	Potential Disproportionate Burden?
Major Service Reduction	2 - Division	No	No
	10 - Harold St.	No	No
	Combined Reductions (System-level)	No	No
Major Service Increases	New Line – FX 2 – Division	No	No
	10 – Harold St.	No	No
	Combined Improvements (System-level)	No	No
Other Major Service Changes		–	–

Attachment A: Analysis of impact on access to employment, education, health care, food, and parks/public recreation for minority and low-income populations

Line FX 2 – Division (TriMet FX™)

New Line and Weekday Frequency and Weekend Frequency

Creates new access
 Improves access
 Removes access
 Reduces access
 Maintains access

	Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets	Parks & Public Recreation												
IMPROVES AND MAINTAINS ACCESS	<ul style="list-style-type: none"> Improves access to an estimated 111,008 jobs <table border="1" style="margin-top: 10px;"> <caption>Job Characteristics Comparison</caption> <thead> <tr> <th>Category</th> <th>FX 2 (New Line)</th> <th>TriMet District</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>37%</td> <td>46%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>16%</td> <td>16%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>8%</td> <td>11%</td> </tr> </tbody> </table> <p style="text-align: center;"> ■ FX 2 (New Line) ■ TriMet District </p>	Category	FX 2 (New Line)	TriMet District	Low/Medium Wage Jobs*	37%	46%	Jobs Held by Workers of Color*	16%	16%	Jobs Held by Hispanic/Latino Workers*	8%	11%	<ul style="list-style-type: none"> Northwest Staffing Resources ADA Staffing Labor Ready Northwest Mathys + Potestio Oakridge Staffing 	<ul style="list-style-type: none"> Portland State University Portland Community College – SE New Avenues for Youth Portland Chinese School Centennial Middle Franklin HS 	<ul style="list-style-type: none"> Oregon Hospice Portland Women’s Crisis Line Central City Concern Portland Rescue Mission Morrison Child & Family Services P:EAR 	<ul style="list-style-type: none"> Change Fa Supermarket Roman Russian Food Store Tienda San Miguel Grocery Outlet World Foods Safeway (2) Rite Aid (6) 	<ul style="list-style-type: none"> Grant Butte Bella Vista Park Main City Park Kelly Butte Natural Park Harrison Park Mt Tabor Clinton City Park
Category	FX 2 (New Line)	TriMet District																
Low/Medium Wage Jobs*	37%	46%																
Jobs Held by Workers of Color*	16%	16%																
Jobs Held by Hispanic/Latino Workers*	8%	11%																
NEW ACCESS (Downtown)	<ul style="list-style-type: none"> New access to an estimated 46,744 jobs <table border="1" style="margin-top: 10px;"> <caption>Job Characteristics Comparison</caption> <thead> <tr> <th>Category</th> <th>FX 2 (Downtown portion)</th> <th>TriMet District</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>37%</td> <td>46%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>16%</td> <td>16%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>7%</td> <td>11%</td> </tr> </tbody> </table> <p style="text-align: center;"> ■ FX 2 (Downtown portion) ■ TriMet District </p>	Category	FX 2 (Downtown portion)	TriMet District	Low/Medium Wage Jobs*	37%	46%	Jobs Held by Workers of Color*	16%	16%	Jobs Held by Hispanic/Latino Workers*	7%	11%	<ul style="list-style-type: none"> Volt Services Group Apple One Employment Service Campus Points Adecco Medical & Science Staffing 	<ul style="list-style-type: none"> OHSU School of Dentistry St. Mary’s Academy School Portland State University 	<ul style="list-style-type: none"> Central City Concern OHSU Center for Health & Healing Make-A-Wish Foundation of Oregon Morrison Child & Family Services Pathfinders of Oregon 	<ul style="list-style-type: none"> Safeway CVS (2) Green Zebra Grocery 	<ul style="list-style-type: none"> Oregon Parks and Recreation
Category	FX 2 (Downtown portion)	TriMet District																
Low/Medium Wage Jobs*	37%	46%																
Jobs Held by Workers of Color*	16%	16%																
Jobs Held by Hispanic/Latino Workers*	7%	11%																

*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not “White Alone”. Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.

Line 10 – Harold St.

Route Realignment, Increase Weekday Frequency and Span, and Add Weekend Service

Creates new access
 Improves access
 Removes access
 Reduces access
 Maintains access

	Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets	Parks & Public Recreation
IMPROVES ACCESS	<ul style="list-style-type: none"> Improves access to an estimated 57,689 jobs <p style="text-align: center;"> ■ Line 10 ■ TriMet District </p>	<ul style="list-style-type: none"> Vangst Temp Oakridge Staffing Employer Solutions Staffing Group Northwest Staffing Resources ADA Staffing Roth Staffing . 	<ul style="list-style-type: none"> Portland Community College – Downtown Center Portland Community College – CLIMB Center Alice Ott Middle Cleveland High SE Works Community Learning Center 	<ul style="list-style-type: none"> Central City Concern Morrison Child & Family Services Catholic Charities Boys & Girls Club Catholic Community Services Bridges to Change 	<ul style="list-style-type: none"> Oriental Food Values Supermarket SE Supermarket Portland Stop N Save Market Safeway CVS Rite Aid 	<ul style="list-style-type: none"> Powell Butte Raymond City Park Leach Botanical Garden Eastridge City Park Lents Park Mt Scott Park Woodstock Park Crystal Springs Garden
NEW ACCESS (SE 7th Ave)	<ul style="list-style-type: none"> New access to an estimated 32,504 jobs <p style="text-align: center;"> ■ Line 10 (SE 7th portion) ■ TriMet District </p>	<ul style="list-style-type: none"> Northwest Staffing Resources ADA Staffing Volt Services Group CampusPoint Roth Staffing Company Another Source 	<ul style="list-style-type: none"> Portland Community College – Downtown Center Portland Community College – CLIMB Center 	<ul style="list-style-type: none"> National Black VETS Transition Projects Returning Veterans BCFS Health and Human Services Metropolitan Family Service 	<ul style="list-style-type: none"> N/A 	<ul style="list-style-type: none"> N/A

*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not “White Alone”. Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.