



Equity Analysis: FY2018 Annual Service Plan

DRAFT

February 24, 2017

## Executive Summary

TriMet is proposing to implement several service improvements in fall 2017 and spring 2018. In accordance with Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B, TriMet conducts an Equity Analysis any time Major Service Changes are proposed to ensure that changes do not unfairly impact people of color and low-income populations. The service proposal for the next year includes Major Service Changes to ten bus lines, including two brand new lines. Thus, an analysis is required prior to the TriMet Board of Directors taking action.

### Methodology

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

### Major Service Changes

The proposed addition of two brand new bus lines, the creation of one new bus line by combining portions of two existing lines, and the proposed changes to eight existing lines meet TriMet's established thresholds for Major Service Changes:

Denny/Hall Line (New)  
E 162<sup>nd</sup> Ave Line (New)  
South Gresham Line (New)  
Line 6-Martin Luther King Jr Blvd  
Line 33-McLoughlin/King Rd  
Line 44-Capitol Hwy/Mocks Crest  
Line 52-Farmington/185<sup>th</sup>  
Line 77-Broadway Halsey  
Line 81-Kane/257<sup>th</sup>  
Line 87-Airport Way/181<sup>st</sup>  
Line 152-Milwaukie

### Findings

1. The vast majority of improvements are on lines with **average-or-above minority and low-income populations** in their service areas. As a result, a greater share of the region's minority and low-income populations stand to **benefit** as compared to non-minority and higher income populations.
2. Found **no disproportionate and adverse effects** from the one major service reduction (Line 152). Proposed changes do reduce access to some jobs in North Clackamas County while reducing travel time and increasing frequency to others.

## I. Background

Building upon several years of ongoing service improvements, TriMet's Annual Service Plan for FY2018<sup>1</sup> proposes Major Service Changes to eight bus lines and the addition of two new bus lines. Other changes will involve additional peak hour trips on over-loaded lines and improvements in on-time performance for lines with high ridership but lower current reliability. Though these changes will represent improvements for riders on those lines, they are not large enough changes to be reviewed as Major Service Changes. The Major Service Changes presented here represent the large majority of TriMet's proposed changes for FY18. The changes are made possible by the TriMet Board of Directors' approval of a ten year payroll and self-employment tax rate increase in 2015.

TriMet has been engaging the community for the past few years to develop a shared vision for future transit service that will guide how the additional revenue is invested. Each year, TriMet staff will use information developed from the shared vision planning efforts and outreach, updated analyses and measures, and additional outreach to prioritize incremental service improvements for that year. The efforts will focus on five factors defined by the TriMet Board: demand, productivity, connections, equity, and growth. Each year's plan will also consider safety, budget availability, and availability of staff and equipment to provide for expanded service.

This report documents the equity analysis conducted for these changes.

## II. TriMet Title VI Compliance

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

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

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

TriMet's Title VI Program <sup>2</sup> 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.

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<sup>1</sup> Fiscal year 2018 runs from July 1, 2017 to June 30, 2018.

<sup>2</sup> TriMet's Title VI Program was updated and submitted to FTA in fall 2017

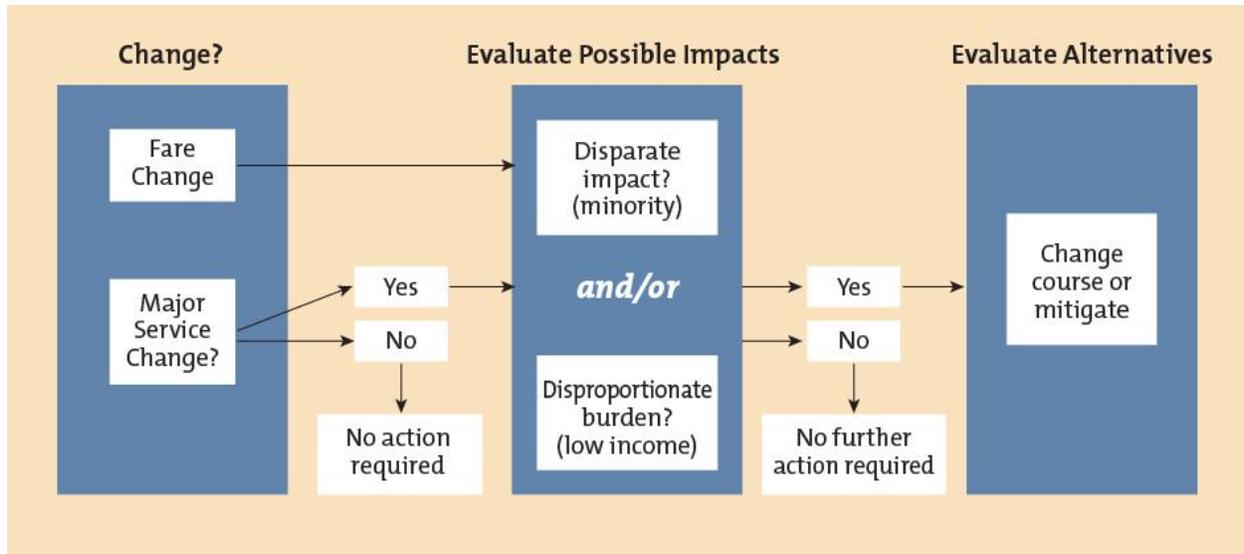


Figure 1: Overview of TriMet's Title VI Equity Analysis process

### A. Major Service Change Policy

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

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

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

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

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

## B. Disparate Impact Policy

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

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

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

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

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

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

1. In the event of potential adverse effects resulting from service reductions:
  - a) A Major Service Change to a *single line* will be considered to have a potential Disparate Impact if the percentage of impacted minority population in the service area of the line exceeds the percentage of minority population of the TriMet District as a whole by at least 3 percentage points (e.g., 31 percent compared to 28 percent).
  - b) To determine the *system-wide* impacts of Major Service Change reductions on more than one line, the percentage of the TriMet district’s minority population that is impacted is compared to the percentage of the TriMet district’s non-minority population that is impacted. If the percentage of the minority population impacted is at least 20 percent greater than the percentage of the non-minority population impacted (e.g., 12 percent compared to 10 percent), the overall impact of changes will be considered disparate.

2. In the event of service improvements:

- a) A major service change to a *single line* will be considered to have a potential Disparate Impact if:
  - i. The improvement is linked to other service changes that have disproportionate and adverse effects on minority populations, or;
  - ii. The percentage of impacted minority population in the service area of the line is less than the percentage of minority population of the TriMet District as a whole by at least 3 percentage points (e.g., 25 percent compared to 28 percent).
- b) To determine the *system-wide* impacts of major service change improvements on more than one line, the percentage of the TriMet district's minority population that is impacted is compared to the percentage of the TriMet district's non-minority population that is impacted. If the percentage of the minority population impacted is at least 20 percent less than the percentage of the non-minority population impacted (e.g., 8 percent compared to 10 percent), the overall impact of changes will be considered disparate.

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

Upon determination of Disparate Impact, TriMet will either:

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

### C. Disproportionate Burden Policy

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

### III. Proposed Service Changes

#### A. Description of Changes

Table 1 lists the proposed service changes by the quarter in which they would take effect. Most changes proposed for the next year are service increases. However, two of the proposed changes – to Line 81 and Line 152 – include the removal of service to some stops as part of their proposed routing changes.

**Table 1: Proposed service changes in FY18 Annual Service Plan**

Quarter	Line	Service Change Description
Fall 2017	6-Martin Luther King Jr Blvd	➤ Change route to serve Delta Park retail center.
	52-Farmington/185th	➤ Add weekday midday and weekend midday trips.
	81-Kane/257th	➤ Change route to serve Division St. in Gresham and provide service to Troutdale Reynolds Industrial Park instead of Glen Otto Park.
	87-Airport Way/181 <sup>st</sup>	<ul style="list-style-type: none"> <li>➤ Split into two lines at SE 182<sup>nd</sup> Ave &amp; Powell</li> <li>➤ Add weekend service to line running between Gateway Transit Center and SE 182<sup>nd</sup> Ave &amp; Powell.</li> <li>➤ All trips between Gateway Transit Center and SE 185<sup>th</sup> Ave/Rockwood will be extended to SE 182<sup>nd</sup> Ave &amp; Powell.</li> </ul>
	152-Milwaukie	<ul style="list-style-type: none"> <li>➤ Change route to serve SE Harmony Rd instead of Kellogg Creek Rd and the Milwaukie Marketplace.</li> <li>➤ Increase weekday frequency.</li> </ul>
	South Gresham Line (New)	➤ Combine portions of current Lines 81 and 87 to form new bus line.
Spring 2018	33-McLoughlin/King Rd	➤ Increase frequency on King Rd portion to better match service on McLoughlin Blvd.
	44-Capitol Hwy/Mocks Crest	➤ Add weekday midday trips between downtown Portland and St. Johns.
	77-Broadway/Halsey	➤ Add weekday midday trips
	Denny/Hall Line (New)	➤ New line connecting Beaverton Transit Center, Washington Square, and Tigard Transit Center.
	E 162 <sup>nd</sup> Ave Line (New)	➤ New line serving E 162 <sup>nd</sup> Ave in East Portland

*Note: The FY18 Annual Service Plan also includes some minor changes to several bus lines for the purpose of addressing reliability and capacity issues. These changes are not included in this analysis because they are too small to reach the Major Service Change threshold.*

## B. Major Service Change Test

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

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

**Denny/Hall Line:** New bus line

**E 162<sup>nd</sup> Ave Line:** New bus line

**South Gresham Line:** New bus line created by splitting Line 87 and combining with portion of current Line 81

**Line 6-Martin Luther King Jr Blvd:** Route length change of over 15%

**Line 33-McLoughlin/King Rd:** Change in span of over 15% on Saturdays and Sundays

**Line 44-Capitol Hwy/Mocks Crest:** Frequency increase of over 15%

**Line 52-Farmington/185<sup>th</sup>:** Frequency increase of over 15% on Saturdays and Sundays

**Line 77-Broadway Halsey:** Frequency increase of over 15% since fall 2014

**Line 81-Kane/257<sup>th</sup>:** Route length changes of over 15%

**Line 87-Airport Way/181<sup>st</sup>:** Split line; Frequency increase of over 15% on weekdays; New weekend service

**Line 152-Milwaukie:** Route length change of over 15%; Frequency increase of over 15%

Table 2: Results of Major Service Change test by line

Line	Change in Route Length	Change in Span	Change in Frequency	Line Split	New Line or New Service
Denny/Hall Line					✓
E 162 <sup>nd</sup> Ave Line					✓
South Gresham Line					✓
6-Martin Luther King Jr Blvd	+17%				
33-McLoughlin/King Rd (Saturday)		+42%			
33-McLoughlin/King Rd (Sunday)		+48%			
44-Capitol Hwy/Mocks Crest (Weekday)			+18%		
52-Farmington/185 <sup>th</sup> (Weekday)			+12%		
52-Farmington/185 <sup>th</sup> (Saturday)			+16%		
52-Farmington/185 <sup>th</sup> (Sunday)			+16%		
77-Broadway/Halsey (Weekday)			+15%*		
81-Kane/257 <sup>th</sup>	+69% -59%**				
87-Airport Way/181 <sup>st</sup> (Weekday)			+68%	✓	
87-Airport Way/181 <sup>st</sup> (Saturday)					✓
87-Airport Way/181 <sup>st</sup> (Sunday)					✓
152-Milwaukie	+15% -44%**		+19%		

\*Line 77 met the Major Service Change threshold due to cumulative changes since fall 2014

\*\*Proposed routing changes to Lines 81 and 152 include both removing and adding portions to each line.

### C. Line-level Analyses

Having identified the service changes which meet the definition of Major Service Change, the next step in the analysis is to look at each line individually to determine potential Disparate Impacts (minority populations) and/or Disproportionate Burdens (low-income populations). Both service reductions and service increases are analyzed. For service reductions, the analysis examines whether *adverse effects* are disproportionately borne by minority and/or low-income populations. On the other hand, for service increases the analysis examines the extent to which the *benefits* of the improvements are inclusive of minority and low-income populations.

The line-level analysis compares minority and low-income populations for the service area of each line proposed for a Major Service Change to the minority and low-income populations of the TriMet District as a whole. The analysis is separated by type of service change being proposed:

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

### 1. Major Service Reduction

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

The proposal for the Line 152 includes the only Major Service Reduction in this service plan.

➤ **Line 152 (Route streamlining, including stop removals)**<sup>3</sup>

The Line 152 route change would improve connections between downtown Milwaukie, Clackamas Community College Harmony campus, and Clackamas Town Center. Doing so would remove Line 152 service from a total of 26 stops, including both directions of service. Twenty-two of these stops (which serve 81 out of the 89 daily ons/offers) have comparable service within ¼ mile, and the population in the surrounding area is **17% minority** and **18% low-income**, as shown in Figures 4 and 5.

Four stops, where the remaining 8 daily ons/offers occur, do not have comparable service within ¼ mile, thereby meeting the definition of *adverse effect* (see Table 3). The population in the area surrounding these stops is **12% minority** and **12% low-income**, which are below the Disparate Impact threshold (31%) and Disproportionate Burden threshold (27%) for Major Service Reductions. Thus, there is **no Disparate Impact** and **no Disproportionate Burden**.

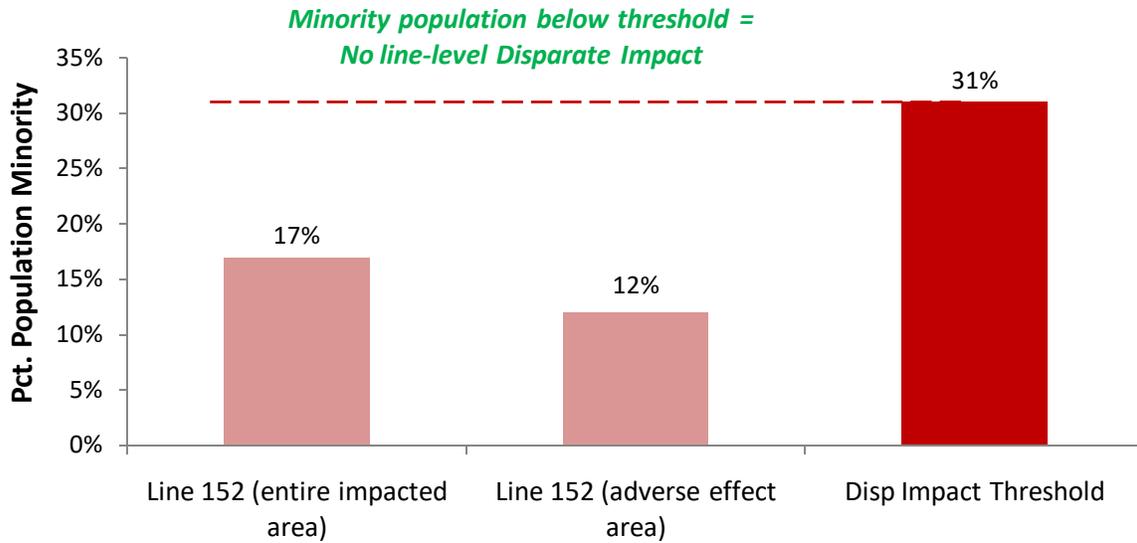
**Table 3: Stops and populations impacted by routing changes to Line 152-Milwaukie**

	No. of Stops	Total daily ons/offers (weekdays)	Pct. Population Minority	Pct. Population Low-Income
Service Removed	26	89	17%	18%
<b>Nearest comparable service</b>				
Less than ¼ mile	22	81	17%	18%
Over ¼ mile*	4	8	12%	12%

\*Adverse effect applies

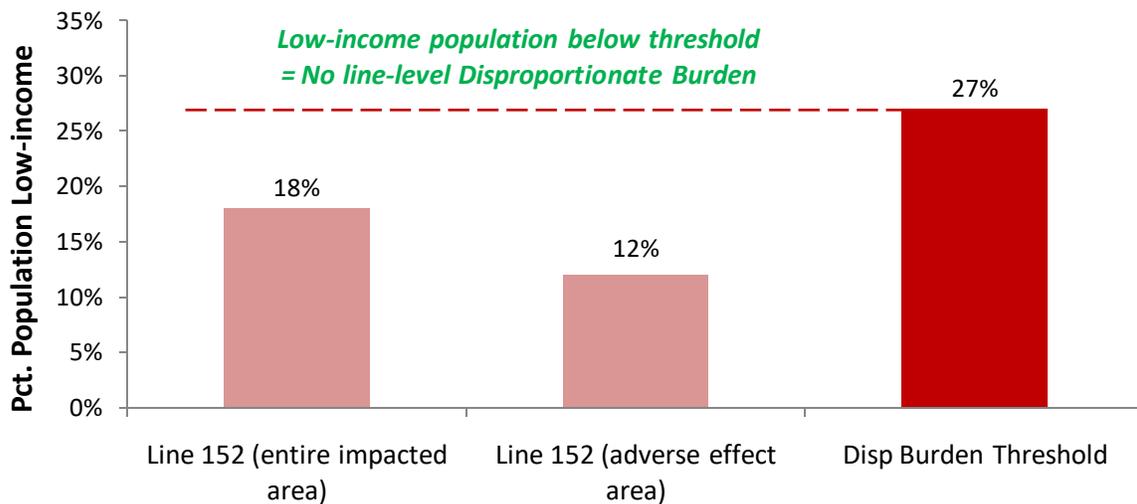
<sup>3</sup> This section only analyzes the service reduction component of the Line 152 service change proposal. The analysis of the service increase component is provided in the next section.

**Figure 4: Minority Population Comparison**  
Proposed Line 152 Major Service Reduction & Disparate Impact Threshold



Source: 2010-2014 American Community Survey, block group level

**Figure 5: Low-income Population Comparison**  
Proposed Line 152 Major Service Reduction & Disproportionate Burden Threshold



Source: 2010-2014 American Community Survey, block group level. Low-income defined as at or below 150% federal poverty level.

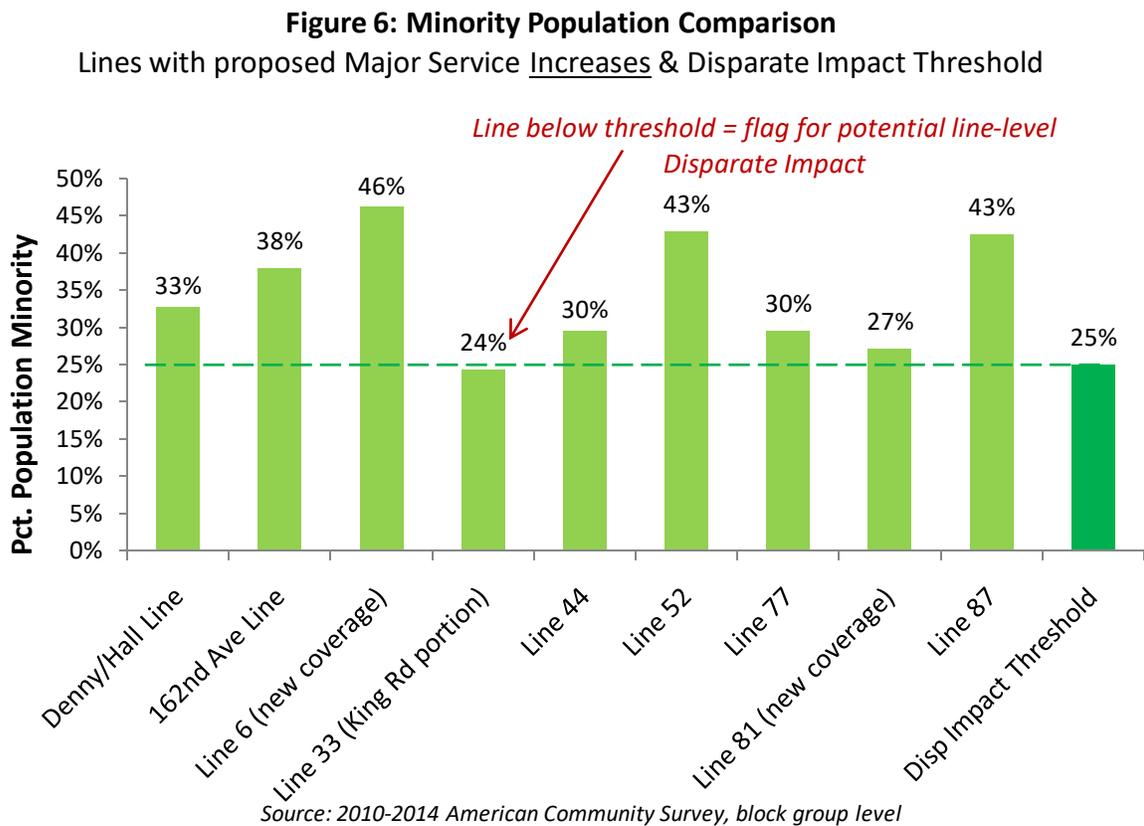
In terms of access<sup>4</sup>, this change would remove service from:

- About 4,700 jobs
  - 50% are low-to-medium wage jobs, which is lower than the TriMet district average
  - 9% are jobs held by people of color, which is lower than the TriMet district average
  - 7% are jobs held by Hispanic/Latino workers, which is slightly lower than the TriMet district average
- 1 professional technical center for high school students
- 1 community health care service center

## 2. Major Service Increases

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

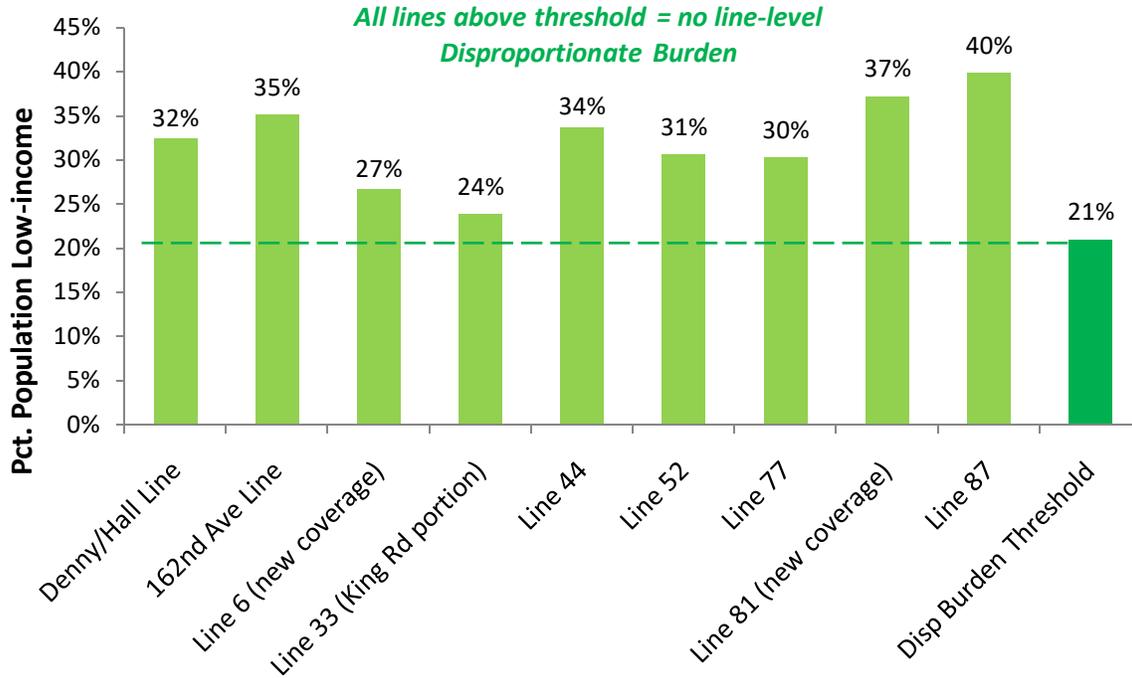
Figure 6 displays the minority population along each line<sup>5</sup> proposed for a major increase as compared to the 25% Disparate Impact threshold. Figure 7 displays the low-income population along each line as compared to the 21% Disproportionate Burden threshold. Because these are proposed service increases, protected populations *falling below* these thresholds are flagged for potential concerns. The narrative analysis of each individual line follows, which includes further considerations of access to jobs, education, health care, and food for minority and low-income populations.



<sup>4</sup> Access is defined as within ¼ mile of a stop on the line. For full details of access to services by line, see Attachment B.

<sup>5</sup> The Line 152 is shown separately for clarity.

**Figure 7: Low-income Population Comparison**  
 Lines with proposed Major Service Increases & Disproportionate Burden  
 Threshold



Source: 2010-2014 American Community Survey, block group level. Low-income defined as at or below 150% federal poverty level.

➤ **Denny/Hall Line (New bus line)**

The proposed routing for this line would potentially benefit a service area population that is **33% minority** and **32% low-income** which are both well above the Disparate Impact (25%) and Disproportionate Burden (21%) thresholds for Major Service Increases. Thus, there is **no Disparate Impact** and **no Disproportionate Burden** at the line-level.

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

- About 31,000 jobs
  - 64% are low-to-medium wage jobs, which is much greater than the TriMet district average
  - 12% are jobs held by people of color, which is slightly lower than the TriMet district average
  - 9% are jobs held by Hispanic/Latino workers, which is slightly greater than the TriMet district average
- 1 employment resource center
- 1 high school
- 1 alternative/trade high school
- 3 community health care service centers
- 11 grocery stores and supermarkets, including several Asian and Hispanic grocers

➤ **162<sup>nd</sup> Ave Line** (New bus line)

The proposed routing for this line would potentially benefit a service area population that is **38% minority** and **35% low-income**, which are both well above the Disparate Impact (25%) and Disproportionate Burden (21%) thresholds for Major Service Increases. Thus, there is **no Disparate Impact** and **no Disproportionate Burden** at the line-level.

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

- Over 7,600 jobs
  - 61% are low-to-medium wage jobs, which is greater than the TriMet district average
  - 13% are jobs held by people of color, which is similar to the TriMet district
  - 9% are jobs held by Hispanic/Latino workers, which is slightly greater than the TriMet district average
- 3 grocery stores/supermarkets, two of which are Hispanic grocers

➤ **Line 6** (Route change)

The new area that would be served by this route change has a population that is **46% minority** and **27% low-income**, both of which exceed the Disparate Impact (25%) and Disproportionate Burden (21%) thresholds for Major Service Increases. Thus, there is **no Disparate Impact** and **no Disproportionate Burden** at the line-level.

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

- About 1,000 jobs
  - 80% are low-to-medium wage jobs, which is much greater than the TriMet district average
  - 12% are jobs held by people of color, which is slightly lower than the TriMet district average
  - 8% are jobs held by Hispanic/Latino workers, which is similar to the TriMet district average
- 2 grocery stores/supermarkets

➤ **Line 33** (Weekend frequency increase)<sup>6</sup>

This service increase would potentially benefit a service area population that is **24% minority**, which is below the Disparate Impact threshold (25%) for Major Service Increases. This indicates a **potential Disparate Impact**, calling for further examination, in particular the considerations below as well as the system-level analysis provided in the next section. The service area population is **24% low-income**, which is above the Disproportionate Burden threshold (21%) for Major Service Increases. Thus, there is **no Disproportionate Burden** at the line-level.

In terms of access, this increase would improve service to:

- About 17,000 jobs

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<sup>6</sup> Line 33 service increase applies only to the King Rd portion of the route so demographic data reflects only the King Rd portion.

- 72% are low- to-medium wage jobs, which is much greater than the TriMet district average
- 12% are jobs held by people of color, which is slightly lower than the TriMet district average
- 9% are jobs held by Hispanic/Latino workers, which is slightly greater than the TriMet district average
- 2 employment resource centers
- 1 high school
- 3 community health care service centers
- 4 grocery stores/supermarkets

➤ **Line 44** (*Weekday frequency increase*)<sup>7</sup>

This service increase would potentially benefit a service area population that is **30% minority** and **34% low-income**, both of which exceed the Disparate Impact (25%) and Disproportionate Burden (21%) thresholds for Major Service Increases. Thus, there is **no Disparate Impact** and **no Disproportionate Burden** at the line-level.

In terms of access, this increase would improve service to:

- About 78,000 jobs
  - 47% are low-to-medium wage jobs, which is lower than the TriMet district average
  - 13% are jobs held by people of color, which is similar to the TriMet district average
  - 6% are jobs held by Hispanic/Latino workers, which is lower than the TriMet district average
- 5 employment resource centers
- 1 high school
- 1 community college
- 1 educational service provider
- 13 community health care service centers
- 4 grocery stores/supermarkets

➤ **Line 52** (*Weekend frequency increase*)

This service increase would potentially benefit a service area population that is **43% minority** and **31% low-income**, both of which exceed the Disparate Impact and Disproportionate Burden thresholds for Major Service Increases. Thus, there is **no Disparate Impact** and **no Disproportionate Burden** at the line-level.

In terms of access, this increase would improve service to:

- About 29,000 jobs
  - 58% are low-to-medium wage jobs, which is greater than the TriMet district average
  - 15% are jobs held by people of color, which is greater than the TriMet district average

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<sup>7</sup> Line 44 service increase applies only to the portion of the route between downtown Portland and St. Johns, so demographic data reflects only that portion.

- 9% are jobs held by Hispanic/Latino workers, which is slightly greater than the TriMet district average
- 3 employment resource centers
- 2 community college campuses
- 5 high schools
- 1 Expeditionary Learning school
- 1 educational service center
- 5 community health care service centers
- 13 grocery stores/supermarkets, including one Hispanic, one Halal, and several Asian grocers

➤ **Line 77 (Weekday frequency increase)**

This service increase would potentially benefit a service area population that is **30% minority** and **30% low-income**, both of which exceed the Disparate Impact and Disproportionate Burden thresholds for Major Service Increases. Thus, there is **no Disparate Impact** and **no Disproportionate Burden** at the line-level.

In terms of access, this increase would improve service to:

- About 106,000 jobs
  - 52% are low-to-medium wage jobs, which is slightly lower than the TriMet district average
  - 13% are jobs held by people of color, which is similar to the TriMet district average
  - 7% are jobs held by Hispanic/Latino workers, which is slightly lower than the TriMet district average
- 4 employment resource centers
- 1 high school
- 1 alternative high school
- 3 educational service centers
- 8 community health care service centers
- 19 grocery stores/supermarkets

➤ **Line 81 (Route change)**

The new area that would be served by this route change has a population that is **27% minority** and **37% low-income**, both of which exceed the Disparate Impact (25%) and Disproportionate Burden (21%) thresholds for Major Service Increases. Thus, there is **no Disparate Impact** and **no Disproportionate Burden** at the line-level.

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

- About 4,400 jobs
  - 71% are low-to-medium wage jobs, which is much greater than the TriMet district average
  - 12% are jobs held by people of color, which is slightly lower than the TriMet district average
  - 8% are jobs held by Hispanic/Latino workers, which is similar to the TriMet district average
- 1 grocery store/supermarket

➤ **Line 87** (New weekend service, frequency increase)<sup>8</sup>

This service increase would potentially benefit a service area population that is **43% minority** and **40% low-income**, both of which exceed the Disparate Impact and Disproportionate Burden thresholds for Major Service Increases. Thus, there is **no Disparate Impact** and **no Disproportionate Burden** at the line-level.

In terms of access, this increase would improve service to:

- About 35,000 jobs
  - 58% are low-to-medium wage jobs, which is greater than the TriMet district average
  - 14% are jobs held by people of color, which is slightly greater than the TriMet district average
  - 9% are jobs held by Hispanic/Latino workers, which is slightly greater than the TriMet district average
- 5 employment resource centers
- 1 high school
- 1 community college campus
- 1 educational service provider
- 3 community health care centers
- 8 grocery stores/supermarkets, including 1 Asian and 2 Hispanic grocers

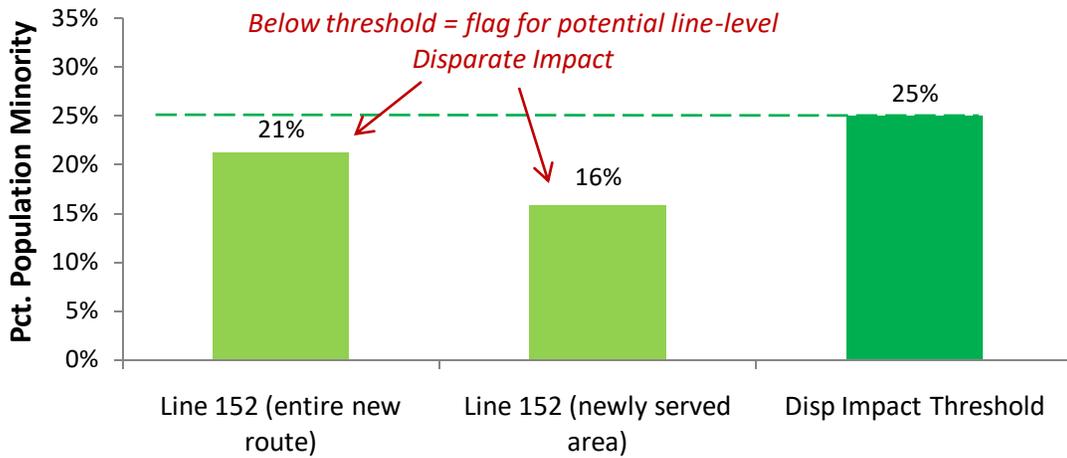
➤ **Line 152** (Route change and frequency increase)

The Line 152 proposal includes both a route change that will serve a new area and a frequency increase on the entire new line. As shown in Figure 8, the entire new line has a population that is **21% minority**, while the area that would be newly served by the route change to the Line 152 has a population that is **16% minority**. Both of these are below the Disparate Impact threshold for Major Service Increases (25%).

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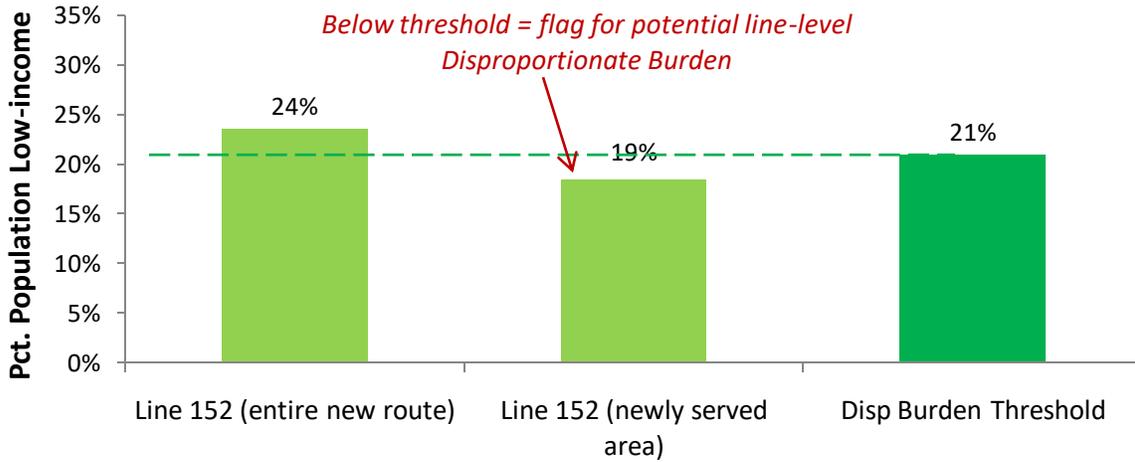
<sup>8</sup> Line 87 service increases apply only to the portion of the route between Gateway Transit Center and SE Powell Blvd, which would be split from the rest of the route as discussed in the “Other Major Service Changes” section.

**Figure 8: Minority Population Comparison**  
Line 152 Increases & Disparate Impact Threshold



Source: 2010-2014 American Community Survey, block group level

**Figure 9: Low-income Population Comparison**  
Line 152 Increases & Disproportionate Burden Threshold



Source: 2010-2014 American Community Survey, block group level. Low-income defined as at or below 150% federal poverty level.

As shown in Figure 9, the entire new line has a population that is **24% low-income**, which is above the Disproportionate Burden threshold for Major Service Increases (21%). On the other hand, the area that would be newly served by the route change to the Line 152 has a population that is **19% low-income**, which is below the 21% Disproportionate Burden threshold.

Thus, there is a **potential Disparate Impact** related to both the route change and the frequency increase, and a **potential Disproportionate Burden** related to the route change, calling for further examination, in particular the considerations below as well as the system-level analysis provided in the next section.

In terms of access, the route change would provide new service to:

- About 400 jobs
  - 67% are low-to-medium wage jobs, which is greater than the TriMet district average
  - 5% are jobs held by people of color, which is much lower than the TriMet district average
  - 5% are jobs held by Hispanic/Latino workers, which is lower than the TriMet district average
- 1 community college campus
- 2 high schools

The frequency increase would improve service to:

- About 18,000 jobs
  - 65% are low-to-medium wage jobs, which is greater than the TriMet district average
  - 12% are jobs held by people of color, which is slightly lower than the TriMet district average
  - 8% are jobs held by Hispanic/Latino workers, which is similar to the TriMet district average
- 2 employment resource centers
- 1 community health service center
- 1 grocery store/supermarket

### **3. Other Major Service Changes**

Two final proposed changes, while qualifying as a Major Service Changes, do not necessarily increase or reduce service. Evaluating potential distribution of adverse effects or benefits of the changes is not applicable, and therefore there is ***no potential Disparate Impact*** and ***no potential Disproportionate Burden*** under TriMet's Title VI policies. Even so, TriMet still analyzed the details of the proposed changes for potential equity impacts.

#### ➤ **Line 87 (Line split)**

The Line 87 is proposed to be split into two lines at SE Powell & 182<sup>nd</sup>. The portion that currently runs between there and Gateway Transit Center is proposed for two increases in service: addition of weekend service and the extension of all trips to SE Powell & 182<sup>nd</sup><sup>9</sup>. The other segment – between SE Powell and Gresham Transit Center – travels largely through residential neighborhoods and does not currently have the demand to warrant the same increase. This portion would be combined with a segment of the current Line 81 that travels along E Powell Blvd, SE Powell Valley Rd, and SE Kane Dr.

As discussed previously, and shown again in Figures 10 and 11, the service area of the Line 87-181<sup>st</sup>/Airport Way portion (proposed for service increases) has a **43% minority** population and **40% low-income** population – both well above average for the TriMet district.

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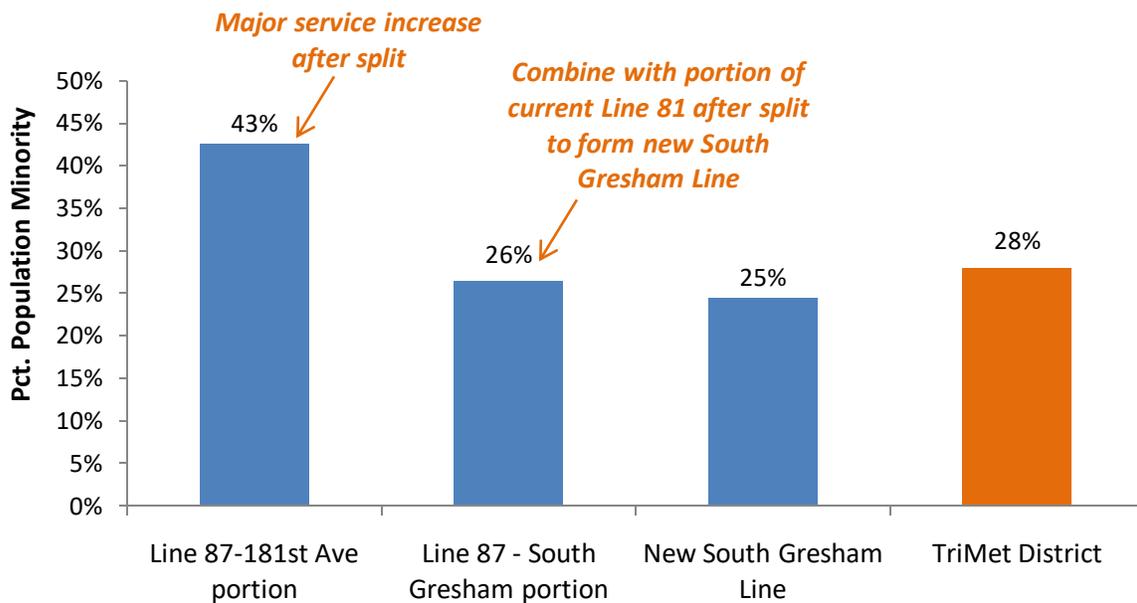
<sup>9</sup> Currently several trips only operate for a portion of the entire route.

➤ **South Gresham Line** (New line created from portions of current Lines 81 and 87)<sup>10</sup>

The route change to the Line 81 would remove Line 81 service from a total of 31 stops, including both directions of service. With the exception of the stop pair at Kane & 8<sup>th</sup>, all of these stops would be served by a new South Gresham line, created by combining the southern portion of the Line 87 (discussed previously) with the segment of the current Line 81 to be removed. The stop pair at Kane & 8<sup>th</sup> is about one-tenth of a mile away from the nearest stops on the new Line 81. Additionally, all stops would continue to be served by Line 80, which has comparable service to the Line 81.

The service area of the new South Gresham line created by portions of the Line 87 and Line 81 has a population that is **25% minority**, which is lower than the 28% minority population for the TriMet District as a whole. The area also has a **28% low-income** population, which is higher than the TriMet District as a whole.

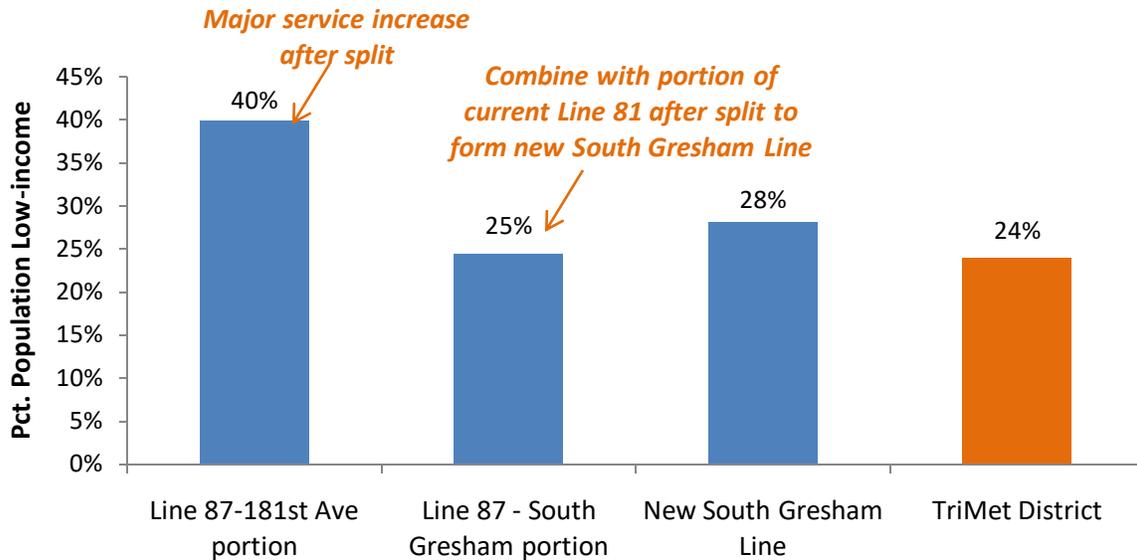
**Figure 10: Minority Population Comparison**  
Proposed Line 87 Line Split & New South Gresham Line



Source: 2010-2014 American Community Survey, block group level

<sup>10</sup> This section does not analyze the service increase component of the Line 81 or Line 87 changes. That analysis is provided in the previous section.

**Figure 11: Low-income Population Comparison**  
Proposed Line 87 Line Split & New South Gresham Line



Source: 2010-2014 American Community Survey, block group level. Low-income defined as at or below 150% federal poverty level.

#### D. System-level Analysis

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

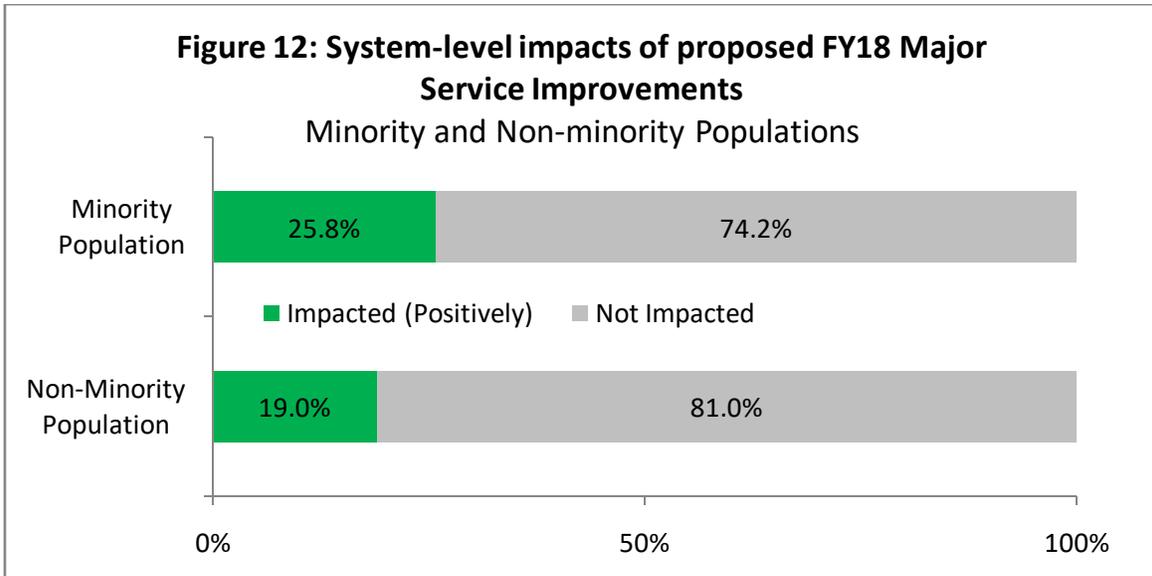
##### ➤ **System-level Disparate Impact Analysis: Major Service Increases**

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

Table 4 and Figure 12 compare the positively impacted minority and non-minority populations. A greater percentage of the District’s minority population stands to benefit from the proposed Major Service Increases as compared to the non-minority population (26% vs. 19%, respectively). Therefore, ***no system-level Disparate Impact is found related to proposed Major Service Increases.***

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

Pct. of TriMet District Non-Minority Pop Positively Impacted	Minority Pop Disparate Impact Threshold	Pct. of TriMet District Minority Pop Positively Impacted	Potential Disparate Impact?
19%	Less than 15%	26%	No



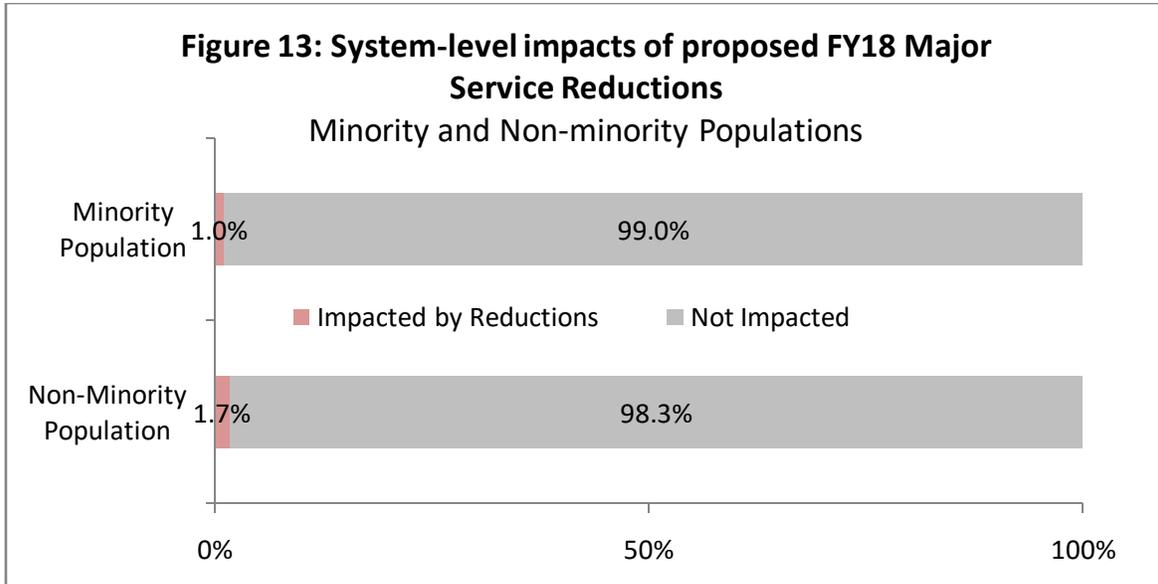
➤ **System-level Disparate Impact Analysis: Major Service Reductions**

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

Table 5 and Figure 13 compare the impacted minority and non-minority populations. A greater percentage of the District’s non-minority population is potentially impacted by the proposed Major Service Reductions as compared to the minority population (1.7% vs. 1.0%, respectively). Therefore, **no system-level Disparate Impact is found related to proposed Major Service Reductions.**

**Table 5: System-level Disparate Impact Analysis of Major Service Reductions**

Pct. of TriMet District Non-Minority Pop Impacted	Minority Pop Disparate Impact Threshold	Pct. of TriMet District Minority Pop Impacted	Potential Disparate Impact?
1.7%	Greater than 2%	1.0%	No



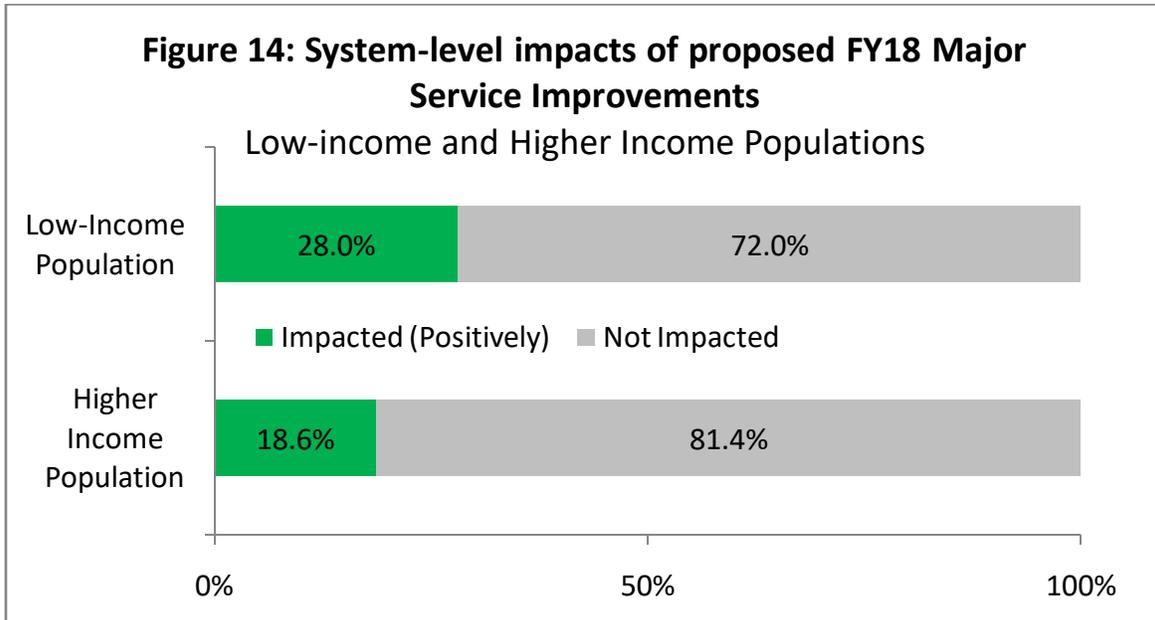
➤ **System-level Disproportionate Burden Analysis: Major Service Increases**

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

Table 6 and Figure 14 compare the impacted low-income and higher income populations. A greater percentage of the District’s low-income population stands to benefit from the proposed Major Service Increases as compared to the higher income population (28% vs. 19%, respectively). Therefore, **no system-level Disproportionate Burden is found related to proposed Major Service Increases.**

**Table 6: System-level Disproportionate Burden Analysis of Major Service Increases**

Pct. of TriMet District Higher Income Pop Positively Impacted	Low-income Pop Disproportionate Burden Threshold	Pct. of TriMet District Low-income Pop Positively Impacted	Potential Disproportionate Burden?
19%	Less than 15%	28%	No



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

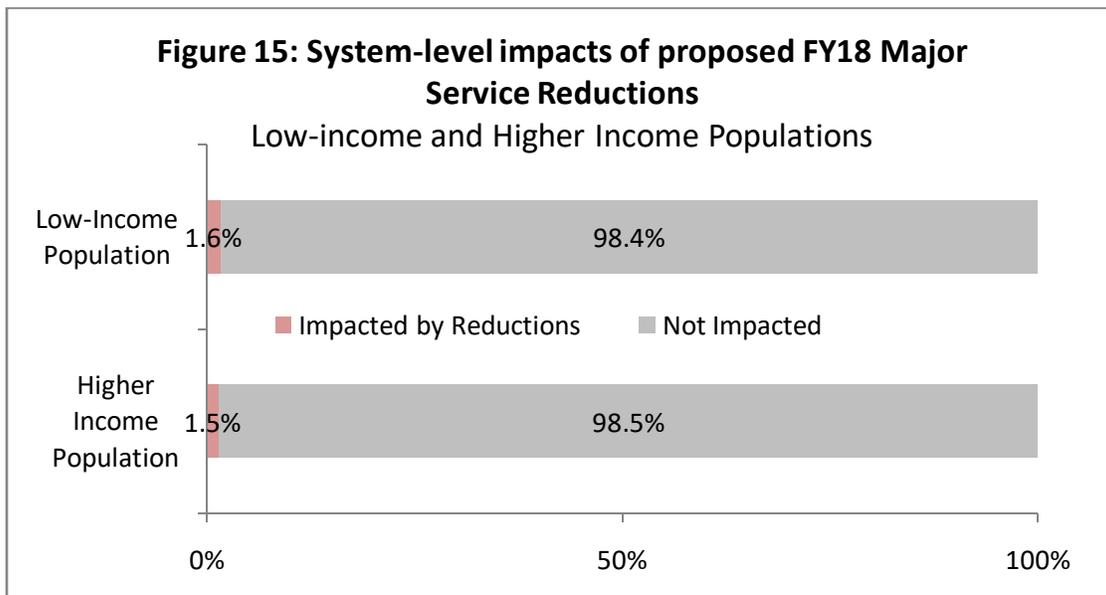
The system-level Disproportionate Burden analysis is completed by determining what proportion of the TriMet District’s low-income population is potentially adversely impacted from the service reductions and comparing that to the District’s higher income population that may be adversely impacted. “Higher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

Table 7 and Figure 15 compare the impacted low-income and higher income populations. A slightly greater percentage of the District’s low-income population is potentially impacted by the proposed Major Service Reductions as compared to the higher income population (1.6% vs. 1.5%, respectively). However, the difference does not meet the Disproportionate Burden threshold of 20%: given the 1.5% of the higher income population impacted by the reductions, the percentage of the low-income population impacted would have to be at least 1.8% to meet the definition of a system-level Disproportionate

Burden. Therefore, *no system-level Disproportionate Burden is found related to proposed Major Service Reductions.*

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

Pct. of TriMet District Higher Income Pop Impacted	Low-income Pop Disproportionate Burden Threshold	Pct. of TriMet District Low-income Pop Impacted	Potential Disproportionate Burden?
1.5%	Greater than 1.8%	1.6%	No



#### IV. Community Engagement

The service proposals analyzed in this report stem from a multi-year planning and outreach process to develop a vision for future transit service in the Portland metropolitan region. Divided by sub-region of the TriMet service district, these “Service Enhancement Plans” were undertaken to identify and prioritize opportunities to improve bus service as well as pedestrian and bike access to transit, given current and projected population and job growth. These are long-range plans which include dozens of bus service improvements beyond those proposed for implementation over the next year. <sup>11</sup>

*[A full summary of community engagement activities will be included in the final version of this document, once all feedback has been received.]*

<sup>11</sup> For more information, go to <http://future.trimet.org>

## V. Summary of Findings

Table 9 summarizes the results of the line-level and system-level Disparate Impact and Disproportionate Burden analyses.

**Table 9: Summary of Disparate Impact and Disproportionate Burden analysis results**

		Potential Disparate Impact?	Potential Disproportionate Burden?
Major Service Reduction	152-Milwaukie	No	No
Major Service Increases	Denny/Hall Line (New)	No	No
	162 <sup>nd</sup> Ave Line (New)	No	No
	6-Martin Luther King Jr Blvd	No	No
	33-McLoughlin/King Rd	Yes	No
	44-Capitol Hwy/Mocks Crest	No	No
	52-Farmington/185 <sup>th</sup>	No	No
	77-Broadway/Halsey	No	No
	81-Kane/257 <sup>th</sup>	No	No
	87-Airport Way/181 <sup>st</sup>	No	No
	152-Milwaukie	Yes	Yes
	<i>Combined Improvements (System-level)</i>	No	No
Other Major Service Changes	87-Airport Way/181 <sup>st</sup>	No	No
	<i>South Gresham Line (New)</i>	No	No

As shown in Table 9, Title VI concerns are minimal with the proposed FY18 Annual Service Plan. The proposal promises to improve service significantly for minority and low-income populations, with only two improvements (to the Lines 33 and 152) serving areas with relatively low minority populations. The Line 152 improvement also serves a relatively low proportion of low-income households as compared to the TriMet district. However, improving service on these lines does not raise concerns of an inequitable distribution of benefits given a) the results of the system-level analysis, and b) that the other 8 lines proposed for improvements did not have any line-level Disparate Impacts or Disproportionate Burdens.

The one proposed service reduction (to the Line 152) also does not appear to create disproportionate and adverse effects given the low concentrations of minority and low-income populations potentially impacted.

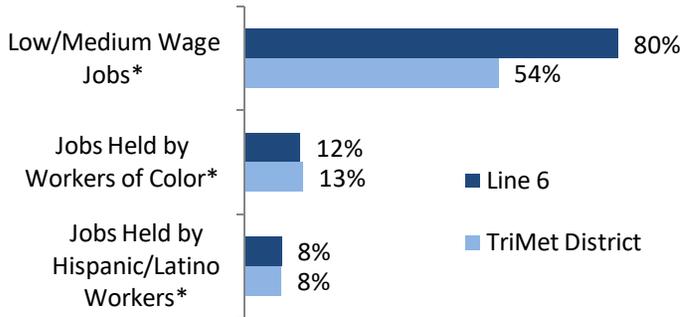
Attachment A: Analysis of impact on access to employment, education, health care,  
and food for minority and low-income populations

DRAFT

## Line 6-Martin Luther King Jr Blvd

Route change to serve Delta Park retail center

Creates new access  
  Improves access  
  Removes access  
  Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets
<p>• <u>Creates new access</u> to an estimated <b>961 jobs</b></p>  <p><i>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.</i></p>	N/A	N/A	N/A	<ul style="list-style-type: none"> <li>Wal-Mart</li> <li>Cash &amp; Carry</li> </ul>

### Line 33-McLoughlin/King Rd

Upgrade service on King Rd to frequent service (affects weekends only)

Creates new access    Improves access    Removes access    Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
<p>• <b>Improves access to an estimated 17,056 jobs</b></p> <table border="1"> <caption>Job Access Comparison</caption> <thead> <tr> <th>Category</th> <th>Line 33</th> <th>TriMet District</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>72%</td> <td>54%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>12%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>9%</td> <td>8%</td> </tr> </tbody> </table> <p><small>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau. Source: US Census Bureau.</small></p>	Category	Line 33	TriMet District	Low/Medium Wage Jobs*	72%	54%	Jobs Held by Workers of Color*	12%	13%	Jobs Held by Hispanic/Latino Workers*	9%	8%	<ul style="list-style-type: none"> <li>• LDS Employment Resource Services</li> <li>• Northwest Family Services</li> </ul>	<ul style="list-style-type: none"> <li>• Clackamas Middle College</li> </ul>	<ul style="list-style-type: none"> <li>• Clackamas County Behavioral Health Centerstone Clinic</li> <li>• Neighborhood Health Center Milwaukie</li> <li>• Sunnyside Health and Wellness Center</li> </ul>	<ul style="list-style-type: none"> <li>• Albertsons</li> <li>• Safeway</li> <li>• Natural Grocers</li> <li>• Winco</li> </ul>
Category	Line 33	TriMet District														
Low/Medium Wage Jobs*	72%	54%														
Jobs Held by Workers of Color*	12%	13%														
Jobs Held by Hispanic/Latino Workers*	9%	8%														

## Line 44-Capitol Hwy/Mocks Crest

Added midday frequency between downtown Portland and St. Johns

Creates new access  
  Improves access  
  Removes access  
  Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
<p>• <b>Improves</b> access to an estimated <b>77,867 jobs</b></p> <table border="1" style="margin-top: 10px;"> <caption>Job Access Comparison</caption> <thead> <tr> <th>Category</th> <th>Line 44 (%)</th> <th>TriMet District (%)</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>47%</td> <td>54%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>13%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>6%</td> <td>8%</td> </tr> </tbody> </table> <p><small>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau. Source: US Census Bureau.</small></p>	Category	Line 44 (%)	TriMet District (%)	Low/Medium Wage Jobs*	47%	54%	Jobs Held by Workers of Color*	13%	13%	Jobs Held by Hispanic/Latino Workers*	6%	8%	<ul style="list-style-type: none"> <li>• Job Corps Outreach, Admission, &amp; Placement</li> <li>• New Avenues for Youth</li> <li>• Oregon State Worksource Center</li> <li>• Portland Metro Central</li> <li>• Portland Development Commission</li> <li>• Urban League</li> </ul>	<ul style="list-style-type: none"> <li>• Jefferson High School</li> <li>• Oregon Council for Hispanic Advancement</li> <li>• PCC Cascade</li> </ul>	<ul style="list-style-type: none"> <li>• Bud Clark Acute Care Clinic</li> <li>• Cascadia BHC Garlington Center</li> <li>• Central City Concern Old Town Clinic</li> <li>• Central City Concern Old Town Recovery Center</li> <li>• Children's Community Clinic</li> <li>• Jefferson High School Health Clinic</li> <li>• Multnomah County Mental Health &amp; Addiction Svcs</li> <li>• Multnomah County NE Health &amp; Dental Clinic</li> <li>• Multnomah County N Portland Health &amp; Dental Clinic</li> <li>• NARA Indian Health Clinic</li> <li>• NUNM Hooper Detox</li> <li>• OHSU Avel Gordly Center for Healing</li> <li>• Oregon College of Oriental Medicine Clinic</li> </ul>	<ul style="list-style-type: none"> <li>• McCormick Pier Grocery &amp; Deli</li> <li>• New Seasons (2 locations)</li> <li>• Safeway</li> <li>• World Foods</li> </ul>
Category	Line 44 (%)	TriMet District (%)														
Low/Medium Wage Jobs*	47%	54%														
Jobs Held by Workers of Color*	13%	13%														
Jobs Held by Hispanic/Latino Workers*	6%	8%														

## Line 52-Farmington/185th

Added frequency on Saturdays and Sundays

Creates new access  
  Improves access  
  Removes access  
  Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
<p>• <u>Improves</u> access to an estimated <b>29,363 jobs</b></p> <table border="1" style="margin-left: 20px;"> <caption>Job Access Comparison</caption> <thead> <tr> <th>Category</th> <th>Line 52 (%)</th> <th>TriMet District (%)</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>58%</td> <td>54%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>15%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>9%</td> <td>8%</td> </tr> </tbody> </table> <p><small>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.</small></p>	Category	Line 52 (%)	TriMet District (%)	Low/Medium Wage Jobs*	58%	54%	Jobs Held by Workers of Color*	15%	13%	Jobs Held by Hispanic/Latino Workers*	9%	8%	<ul style="list-style-type: none"> <li>• Goodwill Industries Aloha</li> <li>• Oregon State Worksource Center in Beaverton/Hillsboro</li> <li>• PCC Rock Creek</li> </ul>	<ul style="list-style-type: none"> <li>• Aloha HS</li> <li>• Beaverton Health &amp; Science School</li> <li>• Beaverton HS</li> <li>• Jesuit HS</li> <li>• PCC Rock Creek</li> <li>• PCC Willow Creek</li> <li>• Sylvan Learning Center</li> <li>• Valley Catholic HS</li> <li>• Westview HS</li> </ul>	<ul style="list-style-type: none"> <li>• Beaverton HS Health Clinic</li> <li>• Lifeworks NW</li> <li>• Neighborhood Health Center Beaverton</li> <li>• NUNM Beaverton Clinic</li> <li>• Washington County HHS Beaverton Clinic</li> </ul>	<ul style="list-style-type: none"> <li>• Albertsons (2 locations)</li> <li>• Aloha Halal Market</li> <li>• Asian Food Center</li> <li>• Bales Marketplace</li> <li>• Can Tho Market</li> <li>• Fred Meyer</li> <li>• Grocery Outlet</li> <li>• Natural Grocers</li> <li>• Nuevo Horizonte Market</li> <li>• Safeway</li> <li>• Trader Joes (2 locations)</li> <li>• U-Need Asian Market</li> <li>• Viet &amp; Thai Food Market</li> </ul>
Category	Line 52 (%)	TriMet District (%)														
Low/Medium Wage Jobs*	58%	54%														
Jobs Held by Workers of Color*	15%	13%														
Jobs Held by Hispanic/Latino Workers*	9%	8%														

## Line 77-Broadway/Halsey

Added frequency on weekdays

Creates new access  
  Improves access  
  Removes access  
  Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets
<p>• <u>Improves</u> access to an estimated <b>105,780 jobs</b></p> <p><i>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.</i></p>	<ul style="list-style-type: none"> <li>• New Avenues for Youth</li> <li>• New Market Self Sufficiency Office</li> <li>• Northeast Self Sufficiency Office</li> <li>• PDC</li> </ul>	<ul style="list-style-type: none"> <li>• Grant HS</li> <li>• New Avenues Alternative HS</li> <li>• Oregon Council for Hispanic Advancement</li> <li>• Reynolds Learning Center</li> <li>• Sylvan Learning Center</li> </ul>	<ul style="list-style-type: none"> <li>• Bud Clark Acute Care Clinic</li> <li>• Central City Concern Old Town Clinic</li> <li>• Central City Concern Old Town Recovery Center</li> <li>• Grant HS School-based Health Clinic</li> <li>• Mult Co Mental Health &amp; Addiction Svcs</li> <li>• NUNM Health Center(3 locations)</li> <li>• Oregon College of Oriental Medicine Clinic (2 locations)</li> <li>• Portland Adventist Community Svcs Health Clinic</li> </ul>	<ul style="list-style-type: none"> <li>• Bi-Mart</li> <li>• Cash &amp; Carry</li> <li>• Food Front Coop</li> <li>• Fred Meyer (3 locations)</li> <li>• Georgia's Grocery</li> <li>• Hollywood Grocery Outlet</li> <li>• Lovejoy Market</li> <li>• McCormick Pier Grocery &amp; Deli</li> <li>• Natural Mart</li> <li>• New Day Market</li> <li>• New Seasons</li> <li>• Pacific Market</li> <li>• QFC</li> <li>• Safeway (3 locations)</li> <li>• Target</li> <li>• Trader Joes (2 locations)</li> <li>• Whole Foods</li> <li>• Winco</li> <li>• Zupan's</li> </ul>

## Line 81-Kane/257th

Route changed to Division St. in Gresham

Creates new access  
  Improves access  
  Removes access  
  Reduces access

	Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
<b>NEW ACCESS</b>	<ul style="list-style-type: none"> <li>Creates new access to an estimated <b>4,403 jobs</b></li> </ul> <table border="1"> <caption>Job Distribution for New Access</caption> <thead> <tr> <th>Category</th> <th>Line 81 new (%)</th> <th>TriMet District (%)</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>71%</td> <td>54%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>12%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>8%</td> <td>8%</td> </tr> </tbody> </table>	Category	Line 81 new (%)	TriMet District (%)	Low/Medium Wage Jobs*	71%	54%	Jobs Held by Workers of Color*	12%	13%	Jobs Held by Hispanic/Latino Workers*	8%	8%	N/A	N/A	N/A	<ul style="list-style-type: none"> <li>Safeway</li> </ul>
Category	Line 81 new (%)	TriMet District (%)															
Low/Medium Wage Jobs*	71%	54%															
Jobs Held by Workers of Color*	12%	13%															
Jobs Held by Hispanic/Latino Workers*	8%	8%															
<b>REDUCED ACCESS</b>	<ul style="list-style-type: none"> <li>Reduces access to an estimated <b>3,704 jobs</b></li> </ul> <table border="1"> <caption>Job Distribution for Reduced Access</caption> <thead> <tr> <th>Category</th> <th>Line 81 removed (%)</th> <th>TriMet District (%)</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>75%</td> <td>54%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>11%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>9%</td> <td>8%</td> </tr> </tbody> </table>	Category	Line 81 removed (%)	TriMet District (%)	Low/Medium Wage Jobs*	75%	54%	Jobs Held by Workers of Color*	11%	13%	Jobs Held by Hispanic/Latino Workers*	9%	8%	N/A	N/A	N/A	<ul style="list-style-type: none"> <li>Fred Meyer</li> <li>Wal-Mart</li> <li>Winco</li> </ul>
Category	Line 81 removed (%)	TriMet District (%)															
Low/Medium Wage Jobs*	75%	54%															
Jobs Held by Workers of Color*	11%	13%															
Jobs Held by Hispanic/Latino Workers*	9%	8%															

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

## Line 87-Airport Way/181st

New weekend service between Powell and Gateway TC.

Creates new access  
  Improves access  
  Removes access  
  Reduces access

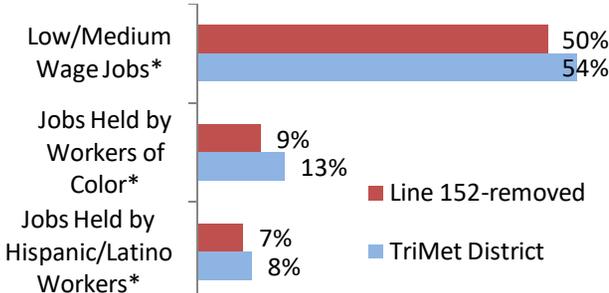
Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
<p>• <u>Improves</u> access to an estimated <b>34,764 jobs</b></p> <table border="1" style="margin-left: auto; margin-right: auto;"> <caption>Job Access Comparison</caption> <thead> <tr> <th>Category</th> <th>Line 87</th> <th>TriMet District</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>58%</td> <td>54%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>14%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>9%</td> <td>8%</td> </tr> </tbody> </table> <p><small>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.</small></p>	Category	Line 87	TriMet District	Low/Medium Wage Jobs*	58%	54%	Jobs Held by Workers of Color*	14%	13%	Jobs Held by Hispanic/Latino Workers*	9%	8%	<ul style="list-style-type: none"> <li>• Human Solutions Rockwood</li> <li>• Impact NW</li> <li>• IRCO</li> <li>• Portland Veterans Outreach Center</li> <li>• Vocational Rehabilitation</li> </ul>	<ul style="list-style-type: none"> <li>• Centennial HS</li> <li>• IRCO Africa House</li> <li>• Mt Hood Community College Maywood</li> </ul>	<ul style="list-style-type: none"> <li>• Centennial HS Health Clinic</li> <li>• Multnomah County Rockwood Health &amp; Dental Clinic</li> <li>• Wallace Medical Concern Rockwood</li> </ul>	<ul style="list-style-type: none"> <li>• Albertsons</li> <li>• Costco</li> <li>• Fred Meyer</li> <li>• Hong Phat Market</li> <li>• Safeway</li> <li>• Tienda Becerras</li> <li>• Tienda y Carniceria La Tapatia</li> <li>• Wal-Mart</li> </ul>
Category	Line 87	TriMet District														
Low/Medium Wage Jobs*	58%	54%														
Jobs Held by Workers of Color*	14%	13%														
Jobs Held by Hispanic/Latino Workers*	9%	8%														

### Line 152-Milwaukie

*Route change to serve SE Harmony Rd. Frequency increased.*

Creates new access  
  Improves access  
  Removes access  
  Reduces access

	Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
<b>NEW ACCESS</b>	<ul style="list-style-type: none"> <li>Creates <u>new</u> access to an estimated <b>386 jobs</b></li> </ul> <table border="1"> <caption>Line 152-new vs TriMet District - New Access</caption> <thead> <tr> <th>Category</th> <th>Line 152-new</th> <th>TriMet District</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>67%</td> <td>54%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>5%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>5%</td> <td>8%</td> </tr> </tbody> </table>	Category	Line 152-new	TriMet District	Low/Medium Wage Jobs*	67%	54%	Jobs Held by Workers of Color*	5%	13%	Jobs Held by Hispanic/Latino Workers*	5%	8%	N/A	<ul style="list-style-type: none"> <li>Clackamas Community College Harmony Campus</li> <li>Clackamas Middle College</li> <li>La Salle HS</li> </ul>	N/A	N/A
Category	Line 152-new	TriMet District															
Low/Medium Wage Jobs*	67%	54%															
Jobs Held by Workers of Color*	5%	13%															
Jobs Held by Hispanic/Latino Workers*	5%	8%															
<b>IMPROVED ACCESS</b>	<ul style="list-style-type: none"> <li>Improves <u>access</u> to an estimated <b>18,075 jobs</b></li> </ul> <table border="1"> <caption>Line 152-improved vs TriMet District - Improved Access</caption> <thead> <tr> <th>Category</th> <th>Line 152-improved</th> <th>TriMet District</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>65%</td> <td>54%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>12%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>8%</td> <td>8%</td> </tr> </tbody> </table>	Category	Line 152-improved	TriMet District	Low/Medium Wage Jobs*	65%	54%	Jobs Held by Workers of Color*	12%	13%	Jobs Held by Hispanic/Latino Workers*	8%	8%	<ul style="list-style-type: none"> <li>Vocational Rehabilitation</li> <li>Exceed Enterprises</li> </ul>	N/A	<ul style="list-style-type: none"> <li>Sunnyside Health &amp; Wellness Center</li> </ul>	<ul style="list-style-type: none"> <li>Albertsons</li> </ul>
Category	Line 152-improved	TriMet District															
Low/Medium Wage Jobs*	65%	54%															
Jobs Held by Workers of Color*	12%	13%															
Jobs Held by Hispanic/Latino Workers*	8%	8%															

<p><b>REMOVED ACCESS</b></p>	<ul style="list-style-type: none"> <li>Removes access to an estimated <b>4,701 jobs</b></li> </ul>  <table border="1"> <thead> <tr> <th>Category</th> <th>Line 152-removed (%)</th> <th>TriMet District (%)</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>50%</td> <td>54%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>9%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>7%</td> <td>8%</td> </tr> </tbody> </table>	Category	Line 152-removed (%)	TriMet District (%)	Low/Medium Wage Jobs*	50%	54%	Jobs Held by Workers of Color*	9%	13%	Jobs Held by Hispanic/Latino Workers*	7%	8%	<p>N/A</p>	<ul style="list-style-type: none"> <li>Sabin-Schellenberg Prof Technical Center</li> </ul>	<ul style="list-style-type: none"> <li>Cascadia Clackamas Lake Road Clinic</li> </ul>	<p>N/A</p>
Category	Line 152-removed (%)	TriMet District (%)															
Low/Medium Wage Jobs*	50%	54%															
Jobs Held by Workers of Color*	9%	13%															
Jobs Held by Hispanic/Latino Workers*	7%	8%															

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

## New Line - E 162<sup>nd</sup> Ave

New line on E 162<sup>nd</sup> Ave between the Columbia Corridor and SE Powell Blvd

Creates new access  
  Improves access  
  Removes access  
  Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
<p>• <b>Creates new access</b> to an estimated <b>7,630 jobs</b></p> <table border="1" style="margin-top: 10px;"> <caption>Job Characteristics Comparison</caption> <thead> <tr> <th>Characteristic</th> <th>162nd Ave Line</th> <th>TriMet District</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>61%</td> <td>54%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>13%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>9%</td> <td>8%</td> </tr> </tbody> </table> <p><small>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.</small></p>	Characteristic	162nd Ave Line	TriMet District	Low/Medium Wage Jobs*	61%	54%	Jobs Held by Workers of Color*	13%	13%	Jobs Held by Hispanic/Latino Workers*	9%	8%	N/A	<ul style="list-style-type: none"> <li>• Serendipity Center</li> </ul>	N/A	<ul style="list-style-type: none"> <li>• Fred Meyer</li> <li>• Su Casa Supermercado</li> <li>• Tortilleria Y Tienda De Leons</li> </ul>
Characteristic	162nd Ave Line	TriMet District														
Low/Medium Wage Jobs*	61%	54%														
Jobs Held by Workers of Color*	13%	13%														
Jobs Held by Hispanic/Latino Workers*	9%	8%														

## New Line - SW Denny/Hall

New line between Beaverton TC and Tigard TC

Creates new access  
  Improves access  
  Removes access  
  Reduces access

Employment	Employment Resource Centers	Education & Educational Services	Community Health Care Services	Grocery Stores & Supermarkets												
<p>• <b>Creates new access</b> to an estimated <b>30,986 jobs</b></p> <table border="1" style="margin-top: 10px; width: 100%; border-collapse: collapse;"> <caption>Job Creation Comparison</caption> <thead> <tr> <th>Category</th> <th>Denny/Hall Line</th> <th>TriMet District</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>64%</td> <td>54%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>12%</td> <td>13%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>9%</td> <td>8%</td> </tr> </tbody> </table> <p><small>*Low/Medium wage jobs defined as having earnings of under \$3,333 per month, or about \$40,000 per year. Jobs held by workers of color include jobs where the race indicated was not "White Alone". Jobs held by Hispanic/Latino workers include jobs where the ethnicity indicated was Hispanic/Latino. Source: US Census Bureau.</small></p>	Category	Denny/Hall Line	TriMet District	Low/Medium Wage Jobs*	64%	54%	Jobs Held by Workers of Color*	12%	13%	Jobs Held by Hispanic/Latino Workers*	9%	8%	<ul style="list-style-type: none"> <li>• Vocational Rehabilitation</li> </ul>	<ul style="list-style-type: none"> <li>• Supafresh Youth Farm</li> <li>• Westside Christian HS</li> </ul>	<ul style="list-style-type: none"> <li>• Asian Health &amp; Service Center</li> <li>• Luke-Dorf West</li> <li>• NUNM Beaverton Clinic</li> </ul>	<ul style="list-style-type: none"> <li>• Asian Food Center</li> <li>• Cash &amp; Carry</li> <li>• Fred Meyer</li> <li>• G-Mart</li> <li>• Grocery Outlet</li> <li>• La Nortena</li> <li>• Natural Grocers</li> <li>• San Francisco Tienda Mexicana</li> <li>• Target</li> <li>• Trader Joes</li> <li>• Uwajimaya</li> </ul>
Category	Denny/Hall Line	TriMet District														
Low/Medium Wage Jobs*	64%	54%														
Jobs Held by Workers of Color*	12%	13%														
Jobs Held by Hispanic/Latino Workers*	9%	8%														