



**Title VI Service Equity Analysis: Winter 2018 Service Changes**

**Department of Diversity & Transit Equity**

**August 16, 2018**

## Executive Summary

TriMet is proposing to implement several service improvements in winter 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 includes Major Service Changes to three 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 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 three existing lines meet TriMet's established threshold for Major Service Changes:

- Line 22 - Parkrose
- Line 23 - San Rafael
- Line 25 - Glisan/Rockwood

### Findings

1. **No system level disparate impact or disproportionate burden** for the 3 major service increases.
2. All improvements are on lines with **average-or-above minority populations** in their service areas. As a result, a greater share of the region's minority populations stand to **benefit** as compared to non-minority populations.
3. All improvements are on lines with **average-or-above low-income populations** in their service areas. As a result, a greater share of the region's low-income populations stand to **benefit** as compared to higher income populations.

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

## I. Background

On-time performance (OTP) is a leading indicator of service reliability and is a TriMet service standard. The same things that delay other traffic most often delay our fixed route buses. To improve our OTP and efficiency, TriMet looks at areas that are within our control – such as scheduling, maintenance, stop spacing, curb extensions, operator training and traffic signal priority.

TriMet's Service Delivery department oversees scheduling and collects OTP data on a continuous basis in order to evaluate the worst performing OTP bus routes. Based off this evaluation and feedback from Bus Operators during employee roundtables, Service Delivery proposes Major Service Changes to three bus lines to take effect in December 2018. The changes will improve on-time performance and reliability as well as increase the allotted time for Operator meal breaks.

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>1</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.

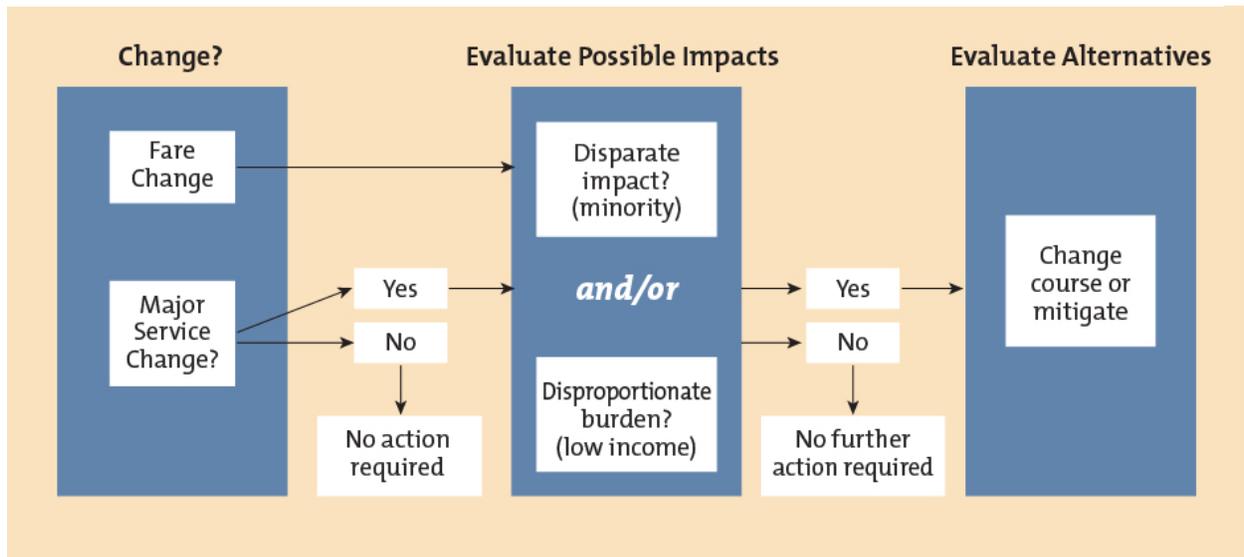
### A. Major Service Change Policy

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.

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<sup>1</sup> TriMet's Title VI Program was updated and submitted to FTA in fall 2016

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, 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 month in which they would take effect. All changes proposed for December 2018 are service increases.

**Table 1: Proposed Service Changes**

Quarter	Line	Service Change Description
Dec 2018	22 – Parkrose	➤ Increase weekday frequency
	23 – San Rafael	
	25 – Glisan/Rockwood	

## 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:

**Line 22 – Parkrose:** Frequency increase of over 15% on weekdays

**Line 23 – San Rafael:** Frequency increase of over 15% on weekdays

**Line 25 – Glisan/Rockwood:** Frequency increase of over 15% on weekdays

**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
Line 22 - Parkrose (Weekday)			+30%		
Line 23 - San Rafael (Weekday)			+28%		
Line 25 – Glisan/Rockwood (Weekday)			+35%		

## 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:

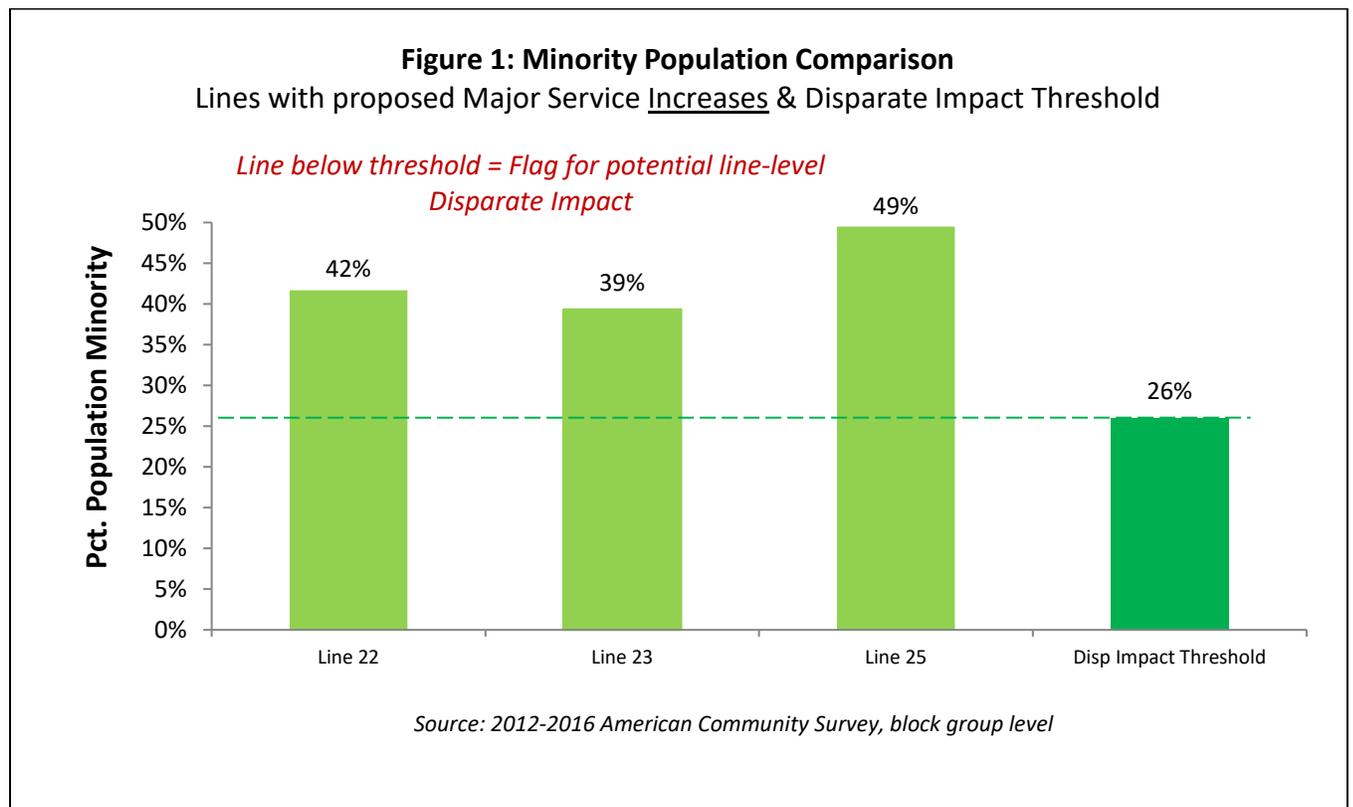
1. Major Service Reduction
2. Major Service Increases
3. Other Major Service Changes

There are no Major Service Reductions or Other Major Service Changes in this proposal.

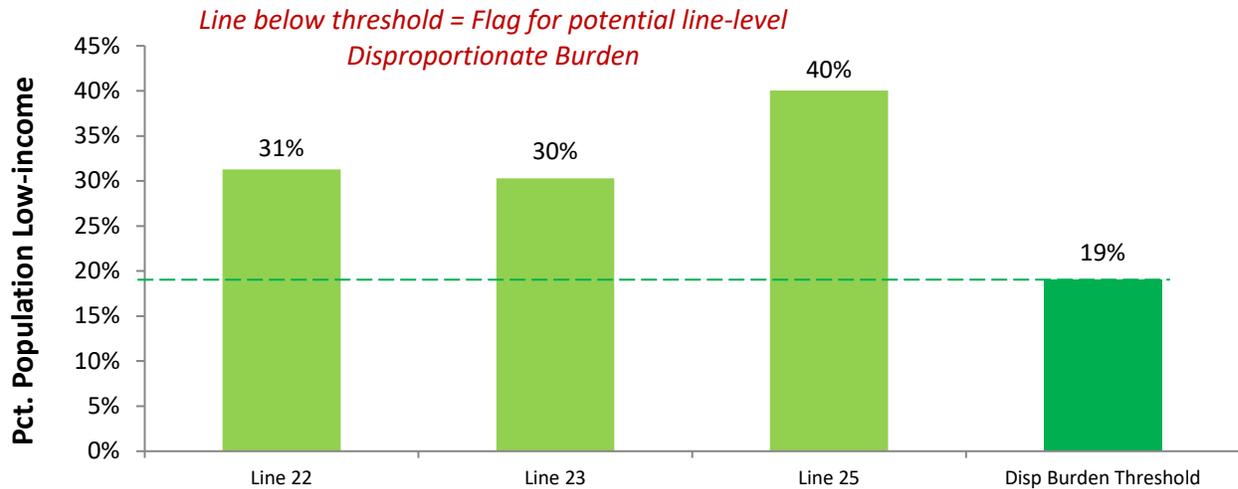
## Major Service Increases

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

Figure 1 displays the minority population along each line proposed for a major increase as compared to the 26% Disparate Impact threshold. Figure 2 displays the low-income population along each line as compared to the 22% 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.



**Figure 2: Low-income Population Comparison**  
 Lines with proposed Major Service Increases & Disproportionate Burden  
 Threshold



Source: 2012-2016 American Community Survey, block group level. Low-income defined as at or below 150% federal poverty level.

➤ **Line 22 – Parkrose** (Weekday frequency increase)

This service increase would potentially benefit a service area population that is **42% minority** and **31% low-income**, which are at or above the Disparate Impact and Disproportionate Burden thresholds for Major Service Increases. Thus, there is **no Disparate Impact** and **Disproportionate Burden** at the line level.

The frequency increase would improve service to:

- About 39,496 jobs
  - 59% are low-to-medium wage jobs, which is above the TriMet district average
  - 14% are jobs held by minorities, which is above the TriMet district average
  - 8% are jobs held by Hisp./Latino workers, which is similar to the TriMet district average
- 1 community college, 1 high school, and, 1 middle school
- 2 grocery stores/supermarkets
- 1 human and social services centers

➤ **Line 23 – Rafael** (Weekday frequency increase)

This service increase would potentially benefit a service area population that is **39% minority** and **30% low-income**, which are above the Disparate Impact and Disproportionate Burden thresholds for Major Service Increases. Thus, there is **no Disparate Impact** and **Disproportionate Burden** at the line level.

The frequency increase would improve service to:

- About 45,256 jobs
  - 58% are low-to-medium wage jobs, which is above the TriMet district average
  - 14% are jobs held by minorities, which is above the TriMet district average
  - 8% are jobs held by Hisp./Latino workers, which is similar to the TriMet district average
- 1 educational center
- 4 grocery stores/supermarkets, including 1 international grocer
- 2 human and social services centers

➤ ***Line 25 – Glisan/Rockwood (Weekday frequency increase)***

This service increase would potentially benefit a service area population that is **49% minority** and **40% low-income**, which are well above the Disparate Impact and Disproportionate Burden thresholds for Major Service Increases. Thus, there is **no Disparate Impact** and **Disproportionate Burden** at the line level.

The frequency increase would improve service to:

- About 18,578 jobs
  - 68% are low-to-medium wage jobs, which is well above the TriMet district average
  - 13% are jobs held by minorities, which is slightly above the TriMet district average
  - 9% are jobs held by Hisp./Latino workers, which is above the TriMet district average
- 2 educational centers
- 9 grocery stores/supermarkets, including 1 Hispanic grocer
- 9 human and social services centers

## 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***

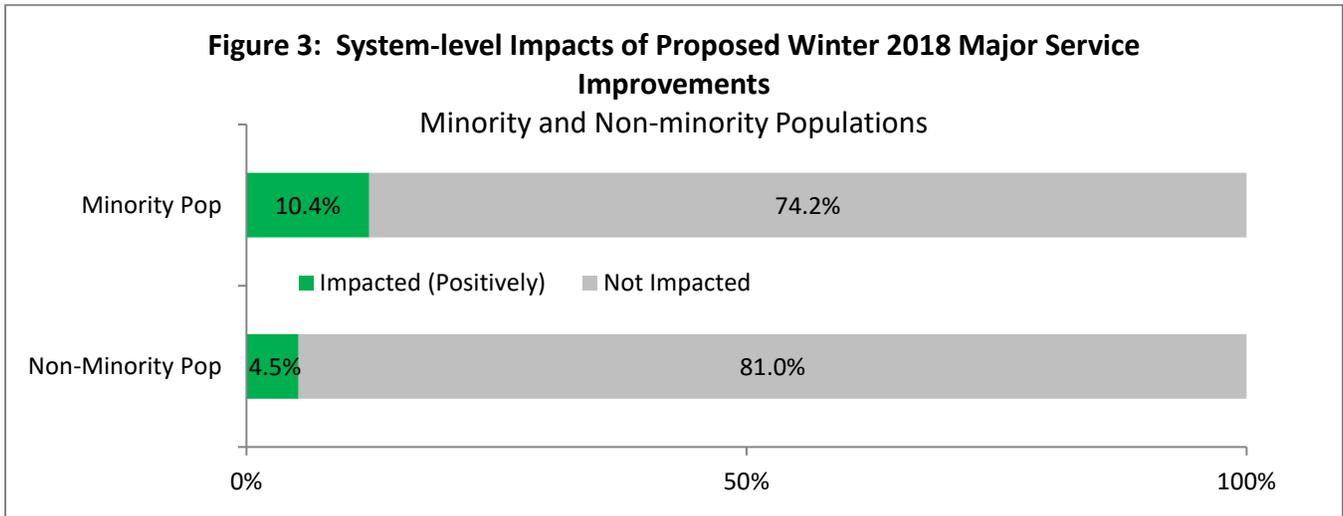
The system-level Disparate Impact analysis of Major Service Increases is completed by determining what portion of the TriMet District's minority population stands to benefit from the Major Service Change improvements, and comparing that to the portion of the District's non-minority population that potentially 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 3 and Figure 3 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 (10.4% vs. 4.5%, respectively). Therefore, ***no System-level Disparate Impact*** is found related to the proposed Major Service Increases.

**Table 3: 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?
4.5%	Less than 3%	10.4%	No

**Figure 3: System-level Impacts of Proposed Winter 2018 Major Service Improvements**



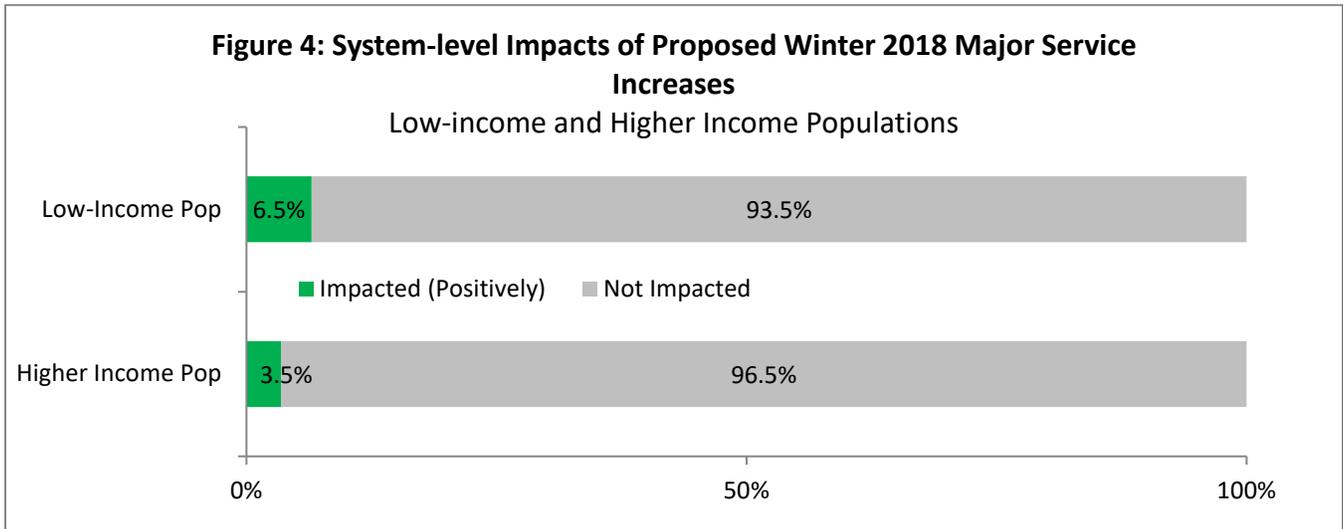
➤ **System-level Disproportionate Burden Analysis: Major Service Increases**

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 4 and Figure 4 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 (6.5% vs. 3.5%, respectively). Therefore, **no System-level Disproportionate Burden** is found related to the proposed Major Service Increases.

**Table 4: 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?
3.5%	Less than 2%	6.5%	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>2</sup>

<MORE TO FOLLOW ON THIS SECTION ONCE COMMUNITY ENGAGEMENT IS COMPLETE>

<sup>2</sup> For more information, go to <http://future.trimet.org>

## V. Summary of Findings

Table 5 summarizes the results of the line-level and system-level Disparate Impact and Disproportionate Burden analyses. As shown, there are no Title VI concerns for the proposed Winter 2018 service changes. The proposal promises to improve service significantly for minority and low-income populations

Improving service on these lines do not raise concerns of an inequitable distribution of benefits given: a) the results of the system-level analysis; b) the proposed improvements did not have any line-level Disparate Impacts; and c) the proposed improvements did not have any line-level Disproportionate Burdens.

**Table 5: Summary of Disparate Impact and Disproportionate Burden analysis results**

		Potential Disparate Impact?	Potential Disproportionate Burden?
<b>Major Service Increases</b>	22 – Parkrose	No	No
	23 – San Rafael	No	No
	25 – Glisan/Rockwood	No	No
	<i>Combined Improvements (System-level)</i>	No	No

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

DRAFT

## Line 22 – Parkrose

*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>39,496 jobs</b></p> <table border="1" style="margin-top: 10px; width: 100%; border-collapse: collapse;"> <caption>Chart Data: Job Access Comparison</caption> <thead> <tr> <th>Category</th> <th>Line 22 (%)</th> <th>TriMet District (%)</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>59%</td> <td>55%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>14%</td> <td>12%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>8%</td> <td>8%</td> </tr> </tbody> </table> <p style="text-align: center; margin-top: 10px;"> <span style="color: #003366;">■</span> Line 22                    <span style="color: #6699CC;">■</span> TriMet District             </p> <p style="font-size: small; margin-top: 10px;">                 *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.             </p>	Category	Line 22 (%)	TriMet District (%)	Low/Medium Wage Jobs*	59%	55%	Jobs Held by Workers of Color*	14%	12%	Jobs Held by Hispanic/Latino Workers*	8%	8%		<ul style="list-style-type: none"> <li>Parkrose HS</li> <li>Parkrose Mid</li> <li>IRCO Africa House</li> <li>Mt. Hood Community College</li> </ul>	<ul style="list-style-type: none"> <li>IRCO</li> </ul>	<ul style="list-style-type: none"> <li>WINCO</li> <li>Professional Plaza</li> </ul>
Category	Line 22 (%)	TriMet District (%)														
Low/Medium Wage Jobs*	59%	55%														
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## Line 23 – Rafael

*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												
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## Line 25 – Glisan/Rockwood

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>18,578 jobs</b></p> <table border="1" style="margin-top: 10px; width: 100%; border-collapse: collapse;"> <caption>Bar Chart Data</caption> <thead> <tr> <th>Category</th> <th>Line 25 (%)</th> <th>TriMet District (%)</th> </tr> </thead> <tbody> <tr> <td>Low/Medium Wage Jobs*</td> <td>68%</td> <td>55%</td> </tr> <tr> <td>Jobs Held by Workers of Color*</td> <td>13%</td> <td>12%</td> </tr> <tr> <td>Jobs Held by Hispanic/Latino Workers*</td> <td>9%</td> <td>8%</td> </tr> </tbody> </table> <p style="text-align: center; margin-top: 10px;"> <span style="color: #003366;">■</span> Line 25                    <span style="color: #6699CC;">■</span> TriMet District             </p> <p style="font-size: small; margin-top: 10px;">                 *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.             </p>	Category	Line 25 (%)	TriMet District (%)	Low/Medium Wage Jobs*	68%	55%	Jobs Held by Workers of Color*	13%	12%	Jobs Held by Hispanic/Latino Workers*	9%	8%		<ul style="list-style-type: none"> <li>IRCO Africa House</li> <li>Latino Network</li> </ul>	<ul style="list-style-type: none"> <li>Human Solutions</li> <li>Albertina Kerr</li> <li>Ellenwood Adult Care Home</li> <li>Impact NW</li> <li>Addictions NW</li> <li>City of Portland Family Services Division</li> <li>Multnomah County WIC</li> <li>IRCO</li> <li>The Mentor Network</li> </ul>	<ul style="list-style-type: none"> <li>Albertsons</li> <li>Rite Aid</li> <li>Walgreens (5 locations)</li> <li>La Tapatia Market</li> <li>WINCO</li> </ul>
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