



**Date:** November 13, 2013

**To:** Board of Directors

**From:** Neil McFarlane

**Subject: RESOLUTION 13-11-68 OF THE TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET) APPROVING THE 2013 TITLE VI PROGRAM AND POLICIES**

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**1. Issue or Purpose of Item.**

The purpose of this item is to request that the TriMet Board of Directors (“Board”) adopt a Resolution that approves TriMet’s Title VI Program and policies (see Attachment A) to be submitted to the Federal Transit Administration (FTA) by December 1, 2013.

**2. Reason for Board Action.**

TriMet is required to comply with Title VI regulations issued by the U.S. Department of Transportation (DOT). Every three years, FTA requires TriMet to submit a new Title VI program in accordance with DOT’s 49 CFR Part 21.7 as a condition of receiving ongoing federal funds. The updated FTA Circular 4702.1B requires that transit providers brief and obtain approval from the transit providers’ governing board regarding Title VI Program and policies, including the results of the established service monitoring program.

**3. Background.**

Title VI was enacted as part of the landmark Civil Rights Act of 1964. It prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance. As a primary recipient of Federal Transit Administration (FTA) funds, TriMet is required to comply with Title VI regulations issued by the U.S. Department of Transportation (DOT). Every three years FTA requires TriMet to submit a new Title VI program in accordance with DOT’s 49 CFR Part 21.7 as a condition of receiving ongoing federal funds.

**New requirements**

In 2012, Federal Title VI requirements were updated by FTA and now require each large public transportation provider’s governing board to approve policies and standards in regard to:

- 1) **Major Service Change Policy**—“Major Service Change” is a threshold for when TriMet will conduct a comprehensive analysis of potential adverse effects and disparate impacts of service changes on minority and low-income populations.

- 2) Disparate Impact Policy & Disproportionate Burden Policies define the measures and thresholds for finding whether a fare change or major service change will result in a “disparate impact” on minority populations or a “disproportionate burden” on low-income populations.
- 3) System-wide Service Standards & System-wide Service Policies are used to determine whether service is provided and amenities are distributed equitably to minority and non-minority populations. TriMet’s Title VI Program needs to include the results from monitoring these service standards and policies as well as documentation to verify the Board’s consideration, awareness, and approval of the monitoring results.
- 4) Public engagement process
  - a. Proposed Policies were made available for public review, and the Diversity & Transit Equity Department hosted three public meetings throughout the district, of which, 72% of the participants indicated that they were transit dependent.
  - b. Information on TriMet’s Title VI program, complaint procedures, and the proposed standards and policies were also made available on the agency’s website for public comment and review. Ongoing updates were provided to TriMet’s Transit Equity Advisory Committee (TEAC). The committee’s feedback was used to improve the program, policies, and public engagement process.

#### **4. Options.**

The Title VI Program Plan is required by federal law and FTA regulations as a condition of receiving federal funding. Its approval by the Board is required prior to submittal to FTA. The Board could choose not to approve the Title VI program, policies and standards if it is determined that it did not wish to at this time.

#### **5. Recommendation.**

The General Manager recommends approval of the Resolution.

## TriMet Title VI Policies and Standards

In 2012, FTA issued Circular 4702.1B updating FTA's Title VI program requirements for FTA funding recipients. FTA now requires each large public transportation provider's governing board to approve policies and standards in regard to:

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

TriMet's Policies on Major Service Change, Disparate Impact, and Disproportionate Burden have been widely shared for public information, awareness and comment, including a series of three community forums held across TriMet's service district. Information about the Title VI process, complaint procedures, and the proposed standards and Policies has been made available via the TriMet website as well by calling the customer service phone number or emailing a dedicated email address.

These Policies are now in the form recommended for final review and action by the TriMet Board at the Board's November 13, 2013 meeting. Each Policy, definition and standard is presented following.

### MAJOR SERVICE CHANGE POLICY

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

**A major service change is defined as:**

1. A change in service of:
  - a. 25 percent or more of the number of route miles, or;
  - b. 25 percent or more of the number of revenue vehicle hours of service on a daily basis for the day of the week for which a change is made, or;
2. A new transit route is established.
3. If changes in service on a route to be effective at more than one date within any fiscal year would equal or exceed 1(a) and/or 1(b) above, the changes in total will be considered a major service change, and an equity analysis will be completed in advance of action on the proposed change.

The following service changes are exempted:

1. Standard seasonal variations in service are not considered major service changes.
2. In an emergency situation, a service change may be implemented immediately without an equity analysis being completed. An equity analysis will be completed if the emergency change is to be in effect for more than 180 days and if the change(s) meet the definition of a Major Service Change. Examples of emergency service changes include but are not limited to those made because of a power failure for a fixed guideway system, the collapse of a bridge over which bus or rail lines pass, major road or rail construction, or inadequate supplies of fuel.
3. Experimental service changes may be instituted for 180 days or less without an equity analysis being completed. An equity analysis will be completed prior to continuation of service beyond the experimental period if the change(s) meet the definition of a Major Service Change.

## DISPARATE IMPACT POLICY

The Disparate Impact Policy establishes a threshold for determining whether a given action has a potential disparate impact on minority populations. Per FTA Circular 4702.1B:

- 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 including any populations that are minority *and* low-income (protected 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 otherwise 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 mitigate the adverse impact of the proposed action; measures that are the least discriminatory alternatives.
- The Disparate Impact Policy defines measures for determination of potential disparate impact on protected populations due to adverse effects of a major service change or any change in fares.
- Adverse effects of service changes are defined as a decrease in the level of transit service (span in days **and/or hours, and/or frequency**) **and/or decreased access to transit service defined as an increase of the access distance to beyond one-quarter mile of bus stops or one-half mile of rail stations.**
- The determination of disparate impact associated with service changes is defined separately for impacts of changes on individual line, and for system-level impacts of changes on more than one line.

### MAJOR SERVICE CHANGES – ONE LINE

A major service change to a line will be considered to have a disparate impact if condition 1. *and* either condition 2.(a) or 2.(b) below is found to be true:

1. 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, and;
- 2.(a) In the event of service reductions, the service change has an adverse effect on the minority population in the service area of the line.
- 2.(b) In the event of service additions, the addition is linked to other service changes that have adverse effects on the minority population in the service area of the line, or; the service addition on the subject line is linked with a service change(s) on other line(s) that have adverse effects on the minority population in the service area of that line or lines.

### MAJOR SERVICE CHANGES – SYSTEM LEVEL

- To determine the system-wide impacts of service changes on more than one line, the percentage of impacted minority population (all impacted tracts) is compared to the percentage of impacted non-minority population. Comparisons of impacts between protected and other populations will be made for all changes for each respective day of service – weekday, Saturday, and Sunday.
- If the percentage of impacted minority population differs from the percentage of impacted non-minority population by more than 20 percent, the overall impact of changes will be considered disparate.

### FARE CHANGES

- For fare changes, a potential disparate impact is noted when the percentage of trips by minority riders using a fare option, in combination with the percentage price change for that option, has an impact that exceeds the comparable impact on non-minority riders.
- Differences in the use of fare options between minority populations and other populations include all such differences that are documented as statistically significant at the 95 percent confidence level.

## DISPROPORTIONATE BURDEN POLICY

This Policy establishes a threshold for determining whether a given action has a potential disproportionate burden on low-income populations versus non-low-income populations. The Disproportionate Burden Policy applies only to low-income populations that are not also minority populations. Per FTA Circular 4702.1B:

- In the course of performing a Title VI equity analysis for possible disproportionate burden, TriMet will analyze how the proposed major service change or fare change action could impact low-income populations as compared to non-low-income populations.
- The analysis of possible disproportionate burden and efforts to avoid, minimize, and mitigate adverse effects on low-income populations is important for planning service and fare changes and Environmental Justice considerations.
- In the event low-income populations could bear a disproportionate burden of the adverse effects of a proposed major service or fare change, the finding would be of a potential disproportionate burden.
- Given a potential disproportionate burden, TriMet would take steps to avoid, minimize, or mitigate impacts where practicable, including identifying alternatives available to low-income riders adversely affected by service changes.

The Disproportionate Burden Policy defines measures for determination of potential disproportionate burden on low-income populations due to adverse effects of a major service change or any change in fares. Adverse effects of service changes are defined as a decrease in the level of transit service (span in days and/or hours, and/or frequency) and/or decreased access to transit service defined as an increase of the access distance to beyond one-quarter mile of bus stops or one-half mile of rail stations.

The determination of disproportionate burden associated with service changes is defined separately for impacts of changes on individual line, and for system-level impacts of changes on more than one line.

### MAJOR SERVICE CHANGES – ONE LINE

A major service change to a line will be considered to have a disproportionate burden if condition 1. and either condition 2.(a) or 2.(b) below is found to be true:

1. The percentage of impacted low-income population in the service area of the line exceeds the percentage of low-income population of the TriMet District as a whole, and;
- 2.(a) In the event of service reductions, the service change has an adverse effect on the low-income population in the service area of the line.
- 2.(b) In the event of service additions, the addition is linked to other service changes that have adverse effects on the low-income population in the service area of the line, or; the service addition on the subject line is linked with a service change(s) on other line(s) that have adverse effects on the low-income population in the service area of that line or lines.

### MAJOR SERVICE CHANGES – SYSTEM LEVEL

- To determine the system wide impacts of service changes on more than one line, the percentage of impacted low-income population (all impacted tracts) is compared to the percentage for impacted non-low-income population.
- Comparisons of impacts between protected and other populations will be made for all changes for each respective day of service; weekday, Saturday, and Sunday.
- If the percentage of impacted low-income population differs from the percentage of impacted non-low-income population by more than 20 percent, the overall impact of changes will be considered disproportionate.

## FARE CHANGES

- For fare changes, a potential disproportionate burden is noted when the percentage of trips by low-income riders using a fare option, in combination with the percentage price change for that option, has an impact that exceeds the comparable impact on non-low-income riders.
- Differences in the use of fare options between low-income populations and non-low-income populations include all such differences that are documented as statistically significant at the 95 percent confidence level.

## SYSTEM-WIDE SERVICE POLICIES AND STANDARDS

TriMet's long-term strategic priorities are to:

- 1) Build the Total Transit System;
- 2) Expand high-capacity transit;
- 3) Expand Frequent Service, and;
- 4) Improve local service.

Building the “Total Transit System” includes a safe and secure trip on frequent, reliable, and comfortable service, easy access to stops and stations, and clear customer information – while ensuring transit equity and environmental justice and moving toward sustainability.<sup>1</sup> TriMet has established standards and policies for service including design, operations and the provision of facilities and other amenities. This framework includes standards and policies as set forward in FTA Circular 4702.1B covering:

Standards:      Vehicle Loads  
                    Service Frequency  
                    On-Time Performance  
                    Service Availability

Policies:      Distribution of Amenities  
                    Vehicle Assignment

- These standards and policies assist in guiding the development and delivery of service in support of TriMet’s mission to make life better for our community by providing high-quality transit service that is safe, dependable, responsive, easy, and inviting.<sup>2</sup>
- These standards and policies also provide benchmarks to ensure that service design and operations practices do not result in discrimination on the basis of race, color, or national origin. They establish a basis for monitoring and analysis of service delivery, availability, and the distribution of amenities and vehicles to determine whether or not any disparate impacts are evident.
- Each standard and policy is described in the Title VI Program. Please refer to Part IV: Service Monitoring for a description of the current analysis of performance/outcomes for each respective standard and policy, comparing the service and amenities provided for minority and non-minority populations respectively.

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<sup>1</sup> TriMet Transit Investment Priorities FY 2014

<sup>2</sup> *Ibid.*

## SUMMARY – FINDINGS FOR ALL SERVICE STANDARDS AND POLICIES

As detailed in the Title VI Program **Part IV: Service Monitoring** the analysis of service standards and policies shows no disparate impacts for minority populations in regard to any service standard or policy on any mode (Bus, MAX, and WES). The chart below provides a checklist of the results from this evaluation.

### Evaluation and Findings – Service Standards and Policies

✓ = No Disparity in Performance or Distribution

Comparison of Minority and Non-Minority Lines

Spring 2013 Service

	Mode of Service				
	Bus	MAX	WES	System	
<b>Service Standards</b>					
<i>Vehicle Loads</i>	✓	✓	✓	✓	
<i>Service Frequency &amp; Span</i>	✓	✓	✓	✓	
<i>On-Time Performance</i>	✓	✓	✓	✓	
<i>Service Availability</i>	✓	✓	✓	✓	
<b>Distribution of Amenities</b>					
<i>Seating</i>				✓	
<i>Elevators</i>				✓	
<i>Digital Displays</i>				✓	
<i>Shelters</i>				✓	
<i>Signs, Maps and/or Schedules</i>				✓	
<i>Waste Receptacles</i>				✓	
<b>Vehicle Assignment</b>	✓	✓	✓	✓	

## **RESOLUTION 13-11-68**

### **RESOLUTION OF THE TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET) APPROVING THE 2013 TITLE VI PROGRAM AND POLICIES**

**WHEREAS**, pursuant to Title VI of the Civil Rights Act of 1964, 42 U.S.C. §2000d *et seq* (“the Act”) and 49 CFR Part 21, the U.S. Department of Transportation and the Federal Transit Administration (FTA) prohibit discrimination on the basis of race, color or national origin; and

**WHEREAS**, as a recipient of federal funds, TriMet is required to comply with the requirements of the Act and applicable implementing regulations; and

**WHEREAS**, pursuant to FTA Circular 4702.1B, TriMet is required to submit its Title VI program to its governing entity for approval; and

**WHEREAS**, the TriMet Board of Directors (Board) has considered and determined to approve the agency’s 2013 Title VI program and policies as set forth in the attached Exhibit A entitled “Title VI Program,” including but not limited to the major service change policy, disparate impact and disproportionate burden policies, and results of the agency’s system-wide service standards and policies monitoring program, all of which are set forth in the “Title VI Program”; and

**WHEREAS**, the Board has authority under ORS Chapter 267 to approve by resolution the “Title VI Program”;

#### **NOW, THEREFORE, BE IT RESOLVED:**

That the Board hereby approves the agency’s 2013 Title VI program and policies as set forth in the attached Exhibit A entitled “Title VI Program,” including but not limited to the major service change policy, disparate impact and disproportionate burden policies, results of the agency’s system-wide service standards and policies monitoring program, and other program elements set forth therein.

Dated: \_\_\_\_\_

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Presiding Officer

Attest:

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Recording Secretary

Approved as to Legal Sufficiency:

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Legal Department

# Title VI Program

Of the Tri-County Metropolitan Transportation  
District of Oregon

Submitted in Fulfillment of Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B  
**2013**



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## INTRODUCTION

This document describes the Title VI program and policies of the Tri-County Metropolitan Transportation District of Oregon (TriMet) developed in accordance with the Federal Transit Administration (FTA) Title VI Circular 4702.1B “*Title VI Requirements and Guidelines for Federal Transit Administration Recipients.*” effective October 1, 2012 (“Circular”) This report is provided as documentation of compliance with Title VI of the Civil Rights Act of 1964 in accordance with FTA grant recipient requirements.

TriMet is a mass transit district created by the Oregon legislature pursuant to Oregon Revised Statutes (ORS) Chapter 267. TriMet is a local government as defined under Oregon law, providing bus, light rail, commuter rail, and ADA paratransit public transportation service in the Portland metro area, providing about 100 million rides each year. Guided by a Board of Directors representing seven districts, the organization is directed by a General Manager appointed by the Board and employs about 2500 union and non-union employees.

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

Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving Federal financial assistance. Specifically, Title VI provides that:

**[N]O 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.**

## OVERVIEW OF TITLE VI

The intent of Title VI is to **remove barriers and conditions** that prevent **minority, low income, limited English proficiency (LEP), and other disadvantaged groups and persons** from receiving access, participation and benefits from federally assisted programs, services and activities. In effect, Title VI promotes fairness and equity in federally assisted programs and activities and is based on the fundamental principle that all human beings are created equal. Title VI is rooted in the constitutional guarantee that all human beings are entitled to equal protection of the laws and specifically addresses involvement of impacted persons in the decision-making process.

## **TITLE VI DISCRIMINATION**

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

- Deny program services, aids, or benefits;
- Provide a different service, aid, or benefit, or provide them in a manner different than they are provided to others; or
- Segregate or separately treat individuals in any matter related to the receipt of any service, aid, or benefit.

Additionally, related regulations and statutes expanded the range and scope of Title VI coverage and applicability to prohibit discrimination on the basis of disability, age, sex, income and LEP as an extension of national origin.

## **PROGRAMS COVERED BY TITLE VI**

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

Approximately 30 Federal agencies provide Federal financial assistance in the form of funds, training, and technical and other assistance to State and local governments, and non-profit and private organizations. These recipients of Federal assistance, in turn, operate programs and deliver benefits and services to individuals (known as "beneficiaries") to achieve the goals of the Federal legislation that authorizes the programs.

If a unit of a state or local government is extended Federal aid and distributes such aid to another governmental entity, all of the operations of the entity which distribute the funds and all of the operations of the department or agency to which the funds are distributed are covered.

Corporations, partnerships, other private organizations, or sole proprietorships are covered in their entirety if such an entity receives Federal financial assistance to it as a whole or if it is principally engaged in certain types of activities.

## **DEFINITIONS**

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

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

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

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

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

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

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

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

Low-Income Person – As defined by TriMet, a person whose median household income is at or below 150 percent of the U.S. Department of Health and Human Services (HHS) poverty guidelines.

Low-Income Population – Any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed FTA program, policy or activity.

Minority Persons – Include the following:

- American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
- Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
- Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
- Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

Minority Population – Any readily identifiable group of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient populations (such

as migrant workers or Native Americans) who will be similarly affected by a proposed Department of Transportation (DOT) program, policy, or activity.

Minority Transit Route – As defined by TriMet and in conformance with FTA C4702.1B. A route that has at least one third of its total revenue mileage in a Census block or block group with a percentage of minority population that exceeds the percentage of minority population in the transit service area.

National Origin – The particular nation in which a person was born, or where the person's parents or ancestors were born.

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

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

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

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

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

Transit Equity – TriMet defines Transit Equity as:

- Policies that promote the equitable distribution of burdens and benefits
- Promoting equal access to resources and services
- Engaging transit-dependent riders in meaningful planning and decision-making processes

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

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

## PART I: GENERAL REQUIREMENTS

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

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

1. Public Notice
2. Complaint Procedures
3. List of Investigations, Complaints, and Lawsuits
4. Public Participation Plan
5. Language Assistance Plan
6. Board Membership and Recruitment
7. Subrecipient Monitoring
8. Facilities Siting and Construction
9. Equity Analyses of major service and fare changes implanted since the previous Title VI program submission in 2010

## TITLE VI NOTICE AND COMPLAINT PROCEDURES

TriMet posts the Title VI public notice on the agency website<sup>1</sup>, in all vehicles (bus and rail), and in the administrative offices. The complaint procedures are available on the agency website<sup>2</sup> and TriMet provides a form that can be used to file a complaint.<sup>3</sup> The complaint form is located in Attachment B and Attachment C shows the vehicle notice.

**TITLE 49 CFR SECTION 21.9(D) REQUIRES RECIPIENTS TO PROVIDE INFORMATION TO THE PUBLIC REGARDING THE RECIPIENT'S OBLIGATIONS UNDER DOT'S TITLE VI REGULATIONS AND APPRISE MEMBERS OF THE PUBLIC OF THE PROTECTIONS AGAINST DISCRIMINATION AFFORDED TO THEM BY TITLE VI. AT A MINIMUM, RECIPIENTS SHALL DISSEMINATE THIS INFORMATION TO THE PUBLIC BY POSTING A TITLE VI NOTICE ON THE AGENCY'S WEBSITE AND IN PUBLIC AREAS OF THE AGENCY'S OFFICE(S), INCLUDING THE RECEPTION DESK, MEETING ROOMS, ETC. RECIPIENTS SHOULD ALSO POST TITLE VI NOTICES AT STATIONS OR STOPS, AND/OR ON TRANSIT VEHICLES.**

<sup>1</sup> <http://www.trimet.org/about/titlevi.htm>

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

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

TriMet's Title VI notice is available on the agency website and states the following:

### **TriMet Respects Civil Rights**

TriMet operates its programs without regard to race, color, national origin, religion, sex, sexual orientation, marital status, age or disability in accordance with applicable law.

### **TriMet Title VI Policy Statement**

Title VI of the Civil Rights Act of 1964 states:

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

TriMet is committed to complying with the requirements of Title VI in all of its federally funded programs and activities. To request additional information on TriMet's Title VI nondiscrimination requirements, call us at 503-238-7433 (TTY 7-1-1) or email [administration@trimet.org](mailto:administration@trimet.org)

### **Making a Title VI complaint**

Any person who believes he or she has been aggrieved by an unlawful discriminatory practice under Title VI may file a complaint with TriMet. Any such complaint must be in writing and filed with TriMet within 180 days following the date of the alleged discriminatory occurrence. For information on how to file a complaint contact TriMet by any of the methods below.

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

**Phone:** 503-962-2217  
**Fax:** 503-962-6469  
**Email:** [administration@trimet.org](mailto:administration@trimet.org)

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE, Washington, D.C. 20590

**IN ORDER TO COMPLY WITH THE REPORTING REQUIREMENTS ESTABLISHED IN 49 CFR SECTION 21.9(B), ALL RECIPIENTS SHALL DEVELOP PROCEDURES FOR INVESTIGATING AND TRACKING TITLE VI COMPLAINTS FILED AGAINST THEM AND MAKE THEIR PROCEDURES FOR FILING A COMPLAINT AVAILABLE TO MEMBERS OF THE PUBLIC. RECIPIENTS MUST ALSO DEVELOP A TITLE VI COMPLAINT FORM, AND THE FORM AND PROCEDURE FOR FILING A COMPLAINT SHALL BE AVAILABLE ON THE RECIPIENT'S WEBSITE. FTA REQUIRES DIRECT AND PRIMARY RECIPIENTS TO REPORT INFORMATION REGARDING THEIR COMPLAINT PROCEDURES IN THEIR TITLE VI PROGRAMS IN ORDER FOR FTA TO DETERMINE COMPLIANCE WITH DOT'S TITLE VI REGULATIONS.**

TriMet's Title VI complaint procedures are posted on the agency website and are as follows:

Any person who believes they have been aggrieved by an unlawful discriminatory practice on the basis of race, color or national origin by TriMet may file a complaint by completing and submitting TriMet's Title VI Complaint form.

TriMet investigates complaints received no more than 180 days after the alleged incident. TriMet will process complaints that are complete. Once a completed complaint is received, TriMet will review it to determine if TriMet has jurisdiction. The complainant will receive an acknowledgement letter informing the complainant whether the complaint will be investigated by TriMet.

TriMet will complete an investigation within 90 days from receipt of a completed complaint form. TriMet may contact the complainant if more information is needed to resolve the case. Unless a longer period is specified by TriMet, the complainant will have ten days from the date of the letter to send requested information to the TriMet investigator assigned to the case.

If TriMet's investigator is not contacted by the complainant or does not receive the additional information within the required timeline, TriMet may administratively close the case. A case may be administratively closed also if the complainant no longer wishes to pursue their case.

After an investigation is complete, TriMet will issue a letter to the complainant summarizing the results of the investigation, stating the findings and advising of any corrective action to be taken as a result of the investigation. If a complainant disagrees with TriMet's determination a reconsideration request may be made by submitting a request in writing to TriMet's General Manager within seven days after the date of TriMet's letter, stating with specificity the basis for the reconsideration. The General Manager will notify the complainant of his decision either to accept or reject the request for reconsideration within ten days. In cases where reconsideration is granted, the General Manager will issue a determination letter to the complainant upon completion of the reconsideration review.

A complainant may file a complaint directly with the Federal Transit Administration by filing a complaint with the Office of Civil Rights, Attention: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE, Washington, D.C. 20590

## TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

During the reporting period, there were no Title VI investigations. Three lawsuits were filed that included allegations based on race discrimination as shown in the following table:

Date Lawsuit Filed	Summary	Status	Action Taken/Findings
4/14/11	Race discrimination	Dismissed	No Merit
11/9/11	Race discrimination	Dismissed	No Merit
7/21/11	Race discrimination	Open	Pending

FIGURE I-1 TITLE VI LAWSUITS

The following table lists complaints received during the reporting period through TriMet's Customer Service Department. The Action Taken/Findings category is designated in accordance with the following:

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

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

**Incomplete:** There is insufficient information to make a finding of "Cleared" or "Confirmed"

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

Date Filed	Summary	Status	Action Taken/Findings
8/16/2010	Race biased statement /conduct	Closed	Inconclusive
9/3/2010	Race biased statements	Closed	Cleared
9/15/2010	Race biased statements	Closed	Cleared
10/4/2010	Race biased statement /conduct	Closed	Incomplete
10/20/2010	Race biased statement	Closed	Inconclusive
1/27/2011	Race biased statement	Closed	Inconclusive
4/20/2011	Race biased statement	Closed	Inconclusive
6/15/2011	Race biased statement	Closed	Incomplete
6/16/2011	Race biased statements	Closed	Inconclusive.
6/28/2011	Race biased statement	Closed	Inconclusive
7/6/2011	Race biased conduct	Closed	Inconclusive
7/6/2011	Race biased statement	Closed	Incomplete
7/11/2011	Race biased conduct	Closed	Inconclusive
8/10/2011	Race biased statement /conduct	Closed	Inconclusive
8/22/2011	Race biased statement /conduct	Closed	Inconclusive
8/25/2011	Race biased statement /conduct	Closed	Inconclusive
10/3/2011	Race biased statement /conduct	Closed	Confirmed
10/7/2011	Race biased statement /conduct	Closed	Incomplete
10/14/2011	Race biased statement	Closed	Inconclusive
10/27/2011	Race biased statement	Closed	Incomplete

<b>11/9/2011</b>	Race biased conduct	Closed	Incomplete
<b>11/16/2011</b>	Race biased conduct	Closed	Inconclusive
<b>12/22/2011</b>	Race biased statement	Closed	Inconclusive
<b>12/28/2011</b>	Race biased statement /conduct	Closed	Incomplete
<b>12/29/2011</b>	Race biased conduct	Closed	Incomplete
<b>1/19/2012</b>	Race biased conduct	Closed	Incomplete
<b>1/24/2012</b>	Race biased conduct	Closed	Incomplete
<b>2/9/2012</b>	Race biased statement	Closed	Inconclusive
<b>3/21/2012</b>	Race biased statement	Closed	Pending
<b>4/24/2012</b>	Race biased statement	Closed	Inconclusive
<b>9/5/2012</b>	Race biased conduct	Closed	Incomplete.
<b>9/18/2012</b>	Race biased statement /conduct	Closed	Incomplete
<b>9/21/2012</b>	Race biased statement	Closed	Incomplete
<b>10/1/2012</b>	Race biased statement	Closed	Inconclusive
<b>10/14/2012</b>	Race biased statement	Closed	Inconclusive
<b>12/14/2012</b>	Race biased statement	Closed	Inconclusive
<b>1/10/2013</b>	Race biased statement	Closed	Inconclusive
<b>2/26/2013</b>	Race biased conduct	Closed	Incomplete
<b>2/28/2013</b>	Race biased statement	Closed	Inconclusive
<b>4/29/2013</b>	Race biased statement	Closed	Incomplete
<b>5/30/2013</b>	Race biased conduct	Closed	Inconclusive
<b>6/17/2013</b>	Race biased statement /conduct	Closed	Inconclusive
<b>6/26/2013</b>	Race biased conduct	Closed	Closed
<b>8/6/2013</b>	Race biased statement	Closed	Inconclusive
<b>8/21/2013</b>	Race/national origin biased statement	Closed	Inconclusive

**FIGURE I-2 TITLE VI COMPLAINTS**

The above complaints were received, investigated and resolved by TriMet staff, prior to institution of a revised process to implement TriMet's Title VI complaint procedure posted on trimet.org. In addition to complaints filed directly through trimet.org, an individual submitting a customer complaint to Customer Service based on transit-related race, color or national origin discrimination, will be directed to the agency's Title VI complaint form and complaint procedure posted on trimet.org. Agency review, investigation and resolution of Title VI complaints is conducted under the lead and coordination of the Director of Diversity and Transit Equity.

**IN ORDER TO COMPLY WITH THE REPORTING REQUIREMENTS OF 49 CFR SECTION 21.9(B), FTA REQUIRES ALL RECIPIENTS TO PREPARE AND MAINTAIN A LIST OF ANY OF THE FOLLOWING THAT ALLEGE DISCRIMINATION ON THE BASIS OF RACE, COLOR, OR NATIONAL ORIGIN: ACTIVE INVESTIGATIONS CONDUCTED BY ENTITIES OTHER THAN FTA; LAWSUITS; AND COMPLAINTS NAMING THE RECIPIENT. THIS LIST SHALL INCLUDE THE DATE THAT THE INVESTIGATION, LAWSUIT, OR COMPLAINT WAS FILED; A SUMMARY OF THE ALLEGATION(S); THE STATUS OF THE INVESTIGATION, LAWSUIT, OR COMPLAINT; AND ACTIONS TAKEN BY THE RECIPIENT IN RESPONSE, OR FINAL FINDINGS RELATED TO, THE INVESTIGATION, LAWSUIT, OR COMPLAINT. THIS LIST SHALL BE INCLUDED IN THE TITLE VI PROGRAM SUBMITTED TO FTA EVERY THREE YEARS.**

## **ANNUAL CERTIFICATIONS AND ASSURANCES**

In accordance with 49 CFR Section 21.7(a), every application for financial assistance from FTA must be accompanied by an assurance that the applicant will carry out the program in compliance with DOT's Title VI regulations. This requirement shall be fulfilled when the applicant/recipient submits its annual certifications and assurances to FTA.

TriMet's Annual Certifications and Assurances are attached in Attachment D.

## **PUBLIC PARTICIPATION PLAN**

TriMet has an established comprehensive public involvement process to ensure minority, low-income and LEP populations are engaged through public outreach and involvement activities. TriMet's Public Engagement Framework (Attachment E) was submitted to the FTA on January 2013 as part of the response to the FTA's Title VI Program Review. TriMet's Diversity and Transit Equity Department serves as a resource to other TriMet divisions to integrate these populations into TriMet's public involvement activities.

According to FTA Circular 4702.1B

**THE CONTENT AND CONSIDERATIONS OF TITLE VI, THE EXECUTIVE ORDER ON LEP, AND THE DOT LEP GUIDANCE SHALL BE INTEGRATED INTO EACH RECIPIENT'S ESTABLISHED PUBLIC PARTICIPATION PLAN OR PROCESS (I.E., THE DOCUMENT THAT EXPLICITLY DESCRIBES THE PROACTIVE STRATEGIES, PROCEDURES, AND DESIRED OUTCOMES THAT UNDERPIN THE RECIPIENT'S PUBLIC PARTICIPATION ACTIVITIES).... RECIPIENTS SHOULD MAKE THESE DETERMINATIONS BASED ON A DEMOGRAPHIC ANALYSIS OF THE POPULATION(S) AFFECTED, THE TYPE OF PLAN, PROGRAM, AND/OR SERVICE UNDER CONSIDERATION, AND THE RESOURCES AVAILABLE.**

In proposing service or fare changes TriMet uses a variety of methods to communicate proposed changes and solicit feedback from the community and special populations. TriMet also engages in extensive community outreach in conjunction with large-scale projects to ensure that affected residences and businesses are informed about the impacts and benefits of the project and are provided an opportunity for input in planning and implementation. On routes where there are a significant number of limited English proficient riders, TriMet staff translates materials to ensure those riders can participate. Special attention is paid to the identification of any transit-dependent persons potentially affected by a route or service change.

Consistent with the requirements of Title VI, TriMet staff use graphical information systems (GIS) mapping software to create maps that identify affected low-income, minority, and limited English proficient communities. The analysis is shared with TriMet staff working with affected communities to develop strategies to engage minority, low-income and LEP populations, identify any communications barriers.

### **PUBLIC PARTICIPATION HIGHLIGHTS**

The following is a summary of TriMet's inclusive public participation since its 2010 Title VI Program submission. The following summary covers fiscal years 2011, 2012, and 2013 and includes outreach conducted for fare and service changes as well as for construction projects during that period.

#### **FY 2011 OUTREACH HIGHLIGHTS**

TriMet involved the public for input on a proposed five cent fare increase and service change in FY 2011. Specifically TriMet:

- Reviewed service equity information to identify outreach needs and gather diverse input.
- Conducted workshops (on fares and other service issues) with organizations serving minority and/or low-income populations.
- Provided child care and food at workshops to help break down barriers to participation.
- Conducted “listening posts” with community leadership of communities of color and other diverse stakeholders.
- Conducted onboard outreach to riders of bus lines with affected service with a focus on minority, low-income and transit-dependent riders.
- Placed ads in minority and community newspapers.

- Conducted an email campaign that targeted key leaders of minority and low-income communities, as well as organization providing services to these populations.

### **FY 2012 OUTREACH HIGHLIGHTS**

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TriMet needed to address a budget shortfall in 2012 and kicked off an extensive six-month outreach effort to involve the community in its decisions. Specifically, TriMet developed an integrated communications plan to engage customers and diverse constituents early in the process to generate conversations about budget challenges and options. The agency received nearly 16,000 public comments during this period. Outreach consisted of one-on-one meetings with diverse stakeholders; meetings and community forums with organizations serving minority and low-income populations as well as business organizations and neighborhood associations; onboard outreach, earned media, social media, community events, surveys, open houses and public hearings.

To take the public's pulse, TriMet created a dynamic online discussion guide and survey that prompted feedback on fare increases and service reductions, as well as background information on the budget situation. The guide was also produced in hard copy for other audiences. The survey tool alone received 4,800 responses. This primary tool was translated into Spanish and hard copies produced for individuals without access to the web.

An extensive three phase email campaign targeted all riders, stakeholders of minority and low-income communities, organizations service these populations, community leaders, business leaders and jurisdictional partners. Outreach teams targeted community and faith-based organizations. Four open houses and three public hearings were held in strategic, accessible locations. Ads were placed in minority and community newspapers to promote the open houses and hearings.

TriMet also created a citizen-represented Budget Task Force and conducted a Twitter Town Hall with the General Manager. Onboard outreach was conducted on more than a third of our transit lines, with special focus on those serving minorities, low-income and transit-dependent riders.

### **FY 2013 OUTREACH HIGHLIGHTS**

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Fortunately, 2013 has not presented need for fare changes or service reductions but TriMet continues to engage communities. In 2013 TriMet created a new advisory committee, involved diverse communities in service planning processes, and continued to initiate discussions with communities and local jurisdictions.

### **TRANSIT EQUITY ADVISORY COMMITTEE**

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In early May 2013, TriMet created a new Transit Equity Advisory Committee to extend the agency's outreach and involvement to transit dependent riders, as well as serve as a link to community organizations. The 14-member panel also provides direction on the agency's transit equity strategy.

The panel provides input and guidance on equity issues related to:

- Title VI and Environmental Justice analysis;
- Service Planning, operational and capital investments;
- Improving service to transit dependent riders; and

- Disseminating information about transportation services to community-based organizations, social service agencies and the community at large.

#### **COMMUNITY FORUMS ON FAIR AND EQUITABLE TRANSIT**

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In order to comply with new FTA requirements to involve the public in developing the Major Service Change, Disparate Impact, and Disproportionate Burden policies, TriMet held community forums in each of the three counties within the TriMet District. Staff presented current policies, after which attendees participated in small group discussions on said policies as well as broader transit equity issues. The same information was posted on TriMet's website, with a survey containing the same prompting questions asked at the forums. How this outreach informed TriMet's Major Service Change, Disparate Impact, and Disproportionate Burden policies and thresholds is described in Part II: Title VI Policies.

#### **WESTSIDE SERVICE ENHANCEMENT PROCESS**

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The Westside Service Enhancement process identified new markets for transit and developed solutions to serve them. TriMet is taking the initiative to engage stakeholders and communities, starting on the Westside and subsequently in all sectors of the region, to create a long-term vision of transit service that will support current and future needs. The Service Enhancement plans and processes recognize areas outside the central city are growing and that travel between points outside the central city has increased significantly, with a need for more local and regional service connecting communities to jobs, education, and services throughout the region. The process included:

- Demographic analyses,
- Public survey research, and
- Extensive outreach and engagement with jurisdictions, neighborhoods, businesses, and community organizations.

#### **COMMUNITY WORKSHOPS**

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To continue building relationships and partnerships, workshops were held jointly with community organizations to have conversations on the budget, e-fares, and service design guidelines. These organizations included Centro Cultural, Immigrant & Refugee Community Organization and the Native American Youth Organization and its Youth and Elder Council. In addition, an open house was held in North Portland's African-American community. Emails informing of the budget were distributed to the agency's database. The General Manager met with ten groups comprised of community-based organizations, faith-based organizations and diverse stakeholders. Riders received information via email, FaceBook, web and hard copies of budget. A survey on future service design was sent to the three county area.

#### **LOCAL AGENCY INVOLVEMENT**

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Discussions with local jurisdictions provided insight into where future employment, residential, and infrastructure growth will occur. TriMet also embarked on a six-month listening tour, meeting with more than 40 community stakeholders, ranging from employers (large and small), neighborhood associations, Citizen Participation Organizations, business associations, and community-based social service providers. The listening tour was vital for developing the plan and laid the ground work for future partnerships that will be essential for Westside Service Enhancement Plan implementation.

## **PORTLAND-MILWAUKIE LIGHT RAIL TRANSIT PROJECT**

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As reported in TriMet's 2010 Title VI program, public involvement on the Portland-Milwaukie Light Rail Transit Project has been under way for several years. The 7.3-mile extension will provide service from Portland State University through southeast Portland neighborhoods into the City of Milwaukie and North Clackamas County. Prior to the start of the public involvement process, TriMet's Diversity and Transit Equity Department provided TriMet's Community Affairs staff with a census track analysis of the corridor. In four neighborhoods along the alignment, up to 12 percent of residents speak Spanish and have limited English proficiency. These areas include:

- Along SE 17th Avenue between Division and Holgate streets;
- Near the future Tacoma Station between SE 17th and SE 32nd avenues;
- In the City of Milwaukie, neighborhoods just east of the station between 32nd and 42nd avenues; and
- Just south of the future Park Avenue station between McLoughlin Boulevard and River Road.

To ensure access to project information for this LEP population, TriMet's Community Affairs staff:

- Notified corridor residents of the Spanish-language translation in project mailings.
- Translated into Spanish and distributed the project fact sheet.
- Provided Spanish-language signage at open houses notifying guests of the availability of interpretive services.

Community Affairs outreach staff also maintains detailed records on all residents and businesses within a quarter mile of the alignment in a project database. These records include data on language proficiency. Additionally, TriMet's Real Property team, which is responsible for property acquisitions and relocations for the project, takes steps to ensure any owner or tenant with limited English proficiency along the corridor affected by any acquisition has access to interpretive and translation support. To date, Real Property staff provided a Mandarin language interpreter to inform and educate a tenant of a future acquisition for the property in which he resides.

## **ROCKWOOD/E 188TH AVE MAX STATION**

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In FY10 and FY11, TriMet's Capital Projects division reconstructed the Rockwood/E 188th Ave MAX Station in Gresham. The station was originally built in the mid-1980s as part of the Eastside MAX Blue Line, the first light rail line constructed in the region. The reconstruction of the station provided safety and access improvements, as well as security improvements. It also provided new station amenities, such as shelters and seating, to complement surrounding redevelopment of the area. Door-to-door outreach within a half-mile radius of the station indicated a need for outreach materials in Spanish and Russian. To ensure access to project information for this LEP population, TriMet's Community Affairs staff:

- Notified corridor residents of the Spanish-language translation in project mailings.
- Translated into Spanish and Russian and distributed the project fact sheet.

## **LANGUAGE ASSISTANCE PLAN**

TriMet is committed to full compliance with Title VI and Executive Order 13166 to provide meaningful access to programs, services and benefits for persons with limited English proficiency. After an extensive review of the LEP populations and their needs, the LEP Workgroup recommended a two-tiered approach to meeting the needs of LEP populations in the TriMet district. Tier One retains successful programs and activities designed to meet the language needs of LEP populations. Tier Two identifies new areas of focus to further the agency's goal of providing LEP customers with meaningful access to TriMet programs and services. TriMet's full Language Assistance Plan is located in Attachment F.

According to FTA Circular 4702.1B:

**CONSISTENT WITH TITLE VI OF THE CIVIL RIGHTS ACT OF 1964, DOT'S IMPLEMENTING REGULATIONS, AND EXECUTIVE ORDER 13166, "IMPROVING ACCESS TO SERVICES FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY" (65 FR 50121, AUG. 11, 2000), RECIPIENTS SHALL TAKE REASONABLE STEPS TO ENSURE MEANINGFUL ACCESS TO BENEFITS, SERVICES, INFORMATION, AND OTHER IMPORTANT PORTIONS OF THEIR PROGRAMS AND ACTIVITIES FOR INDIVIDUALS WHO ARE LIMITED-ENGLISH PROFICIENT (LEP).**

In September 2012 TriMet updated its four factor analysis to ensure they were utilizing information in addition to census data to ensure they are meaningful access to their programs and activities by LEP persons. TriMet continues to provide language services via the website, phone, and visual aids including a graphic novella.

### **UPDATED FOUR FACTOR ANALYSIS**

In accordance with FTA's policy guidance, the initial step for providing meaningful access to services for LEP persons and maintaining an effective LEP program is to identify LEP populations in the service area and their language characteristics through an analysis of available data. Determining the presence of LEP populations in the TriMet service district area was done through an analysis of the following data sources:

- US Census Bureau, 2006-2010 five-year sample, American Community Service data.
- Oregon Department of Education, 2009-2010 school year enrollment data.
- Maps showing TriMet district with concentration of LEP individuals.
- Information gathered through discussion with members of community organizations serving LEP constituents.
- Driver/staff surveys about contact with LEP persons.
- Other internal data available showing frequency of contact with LEP persons.

The updated Four Factor Analysis will guide TriMet efforts to retain successful program and activities designed to meet the language needs of LEP populations, and identify new areas of focus to further the agency's goal of providing LEP customers with meaningful access to TriMet programs and services. The complete analysis is located in Attachment G.

### **UPDATED MAPS**

TriMet updated maps using GIS and census data to determine the proportion of limited English proficient persons within the TriMet district. Analysis of the quantitative data showed that of the estimated total population aged five years and older within Clackamas,

Multnomah, and Washington counties LEP populations represent 8.5 percent with the largest proportion consisting of Spanish speaking LEP individuals (4.56 percent).

The top five languages (Spanish, Vietnamese, Chinese, Russian and Korean) identified using Census ACS 2006-2010 five-year sample data mirror the top five languages identified in the previous Four Factor analysis performed by TriMet using 2000 Census data. These top five languages comprise 80.14 percent of the total LEP population as shown in Figure I-3.

**ACS Languages Spoken by LEP Persons Age 5 and Older  
(Clackamas, Multnomah, and Washington Counties)**

Language Spoken at Home	LEP Population Estimate	Percentage of Total Population	Percentage of LEP Population
Spanish	68,194	4.56%	53.69%
Vietnamese	13,052	0.87%	10.28%
Chinese (Cantonese, Mandarin)	8,900	0.60%	7.01%
Russian	7,346	0.49%	5.78%
Korean	4,288	0.29%	3.38%
Japanese	2,668	0.18%	2.10%
Ukrainian	2,539	0.17%	2.00%
Romanian	1,779	0.12%	1.40%
Tagalog	1,613	0.11%	1.27%
Arabic	1,609	0.11%	1.27%
Mon-Khmer, Cambodian	1,318	0.09%	1.04%
Other Languages	13,702	0.92%	10.79%
<b>Total</b>	<b>127,008</b>	<b>8.50%</b>	

Source: US Census Bureau, 2006-2010 5-year American Community Survey, PUMA cross-tabulation.

**FIGURE I-3 ACS LANGUAGES SPOKEN BY LEP PERSONS AGE 5 AND OLDER**

Using Oregon Department of Education data, Somali and Hmong were identified as meeting ODT's "safe harbor" threshold of 1,000 or five percent of the population.

### **CONTINUED LANGUAGE SERVICES**

TriMet's web page contains links to information in Spanish, Vietnamese, Russian, Chinese, and Korean. In addition, the landing page for Spanish now contains a Trip Planner en español. Spanish speakers can also access TransitTracker (real-time arrival information) en español by calling 503-238-RIDE thereby accessing real time information on the next train or bus arrival. All LEP customers can access language assistance by calling 503-238-RIDE. TriMet's multilingual web pages were also updated to include Title VI Civil Rights notification and complaint procedures as approved by the FTA.

The LEP program continued to coordinate with agency's outreach efforts regarding budget, service and fare changes, and construction projects to carry out targeted outreach to LEP communities that would be affected by proposed changes. Samples of the LEP materials developed during this period are included in Attachment H.

The program continued to use bus bench ads in Spanish to promote the use of public transportation. The demonstration program also updated some of channel cards in Spanish

for placement on all TriMet vehicles that communicate vital customer information for the following: Fare requirements, availability of TriMet customer assistance in Spanish, and the rules for riding. Spanish channel cards shown in Figures I-4, I-5 and I-6 have been placed in all vehicles.



FIGURE I-4 SPANISH FARE CHANNEL CARD



FIGURE I-5 ACCESSING INFORMATION IN SPANISH CHANNEL CARD



FIGURE I-6 SPANISH RESPECT THE RIDE CHANNEL CARD

Staff continued an agency-wide orientation program to inform agency staff about the work done by the LEP advisory committee and the resources available within TriMet to provide better access to LEP customers. TriMet's Marketing Director, LEP coordinator, and LEP Advisory Committee members from TriMet's Operation and Capital Projects departments led the effort.

TriMet's "How to Ride" video in each of the identified LEP target languages were completed and DVD copies were distributed to community based organization working with LEP communities. Copies were also shared with public libraries, schools, and workforce development centers.

The LEP demonstration program updated the graphic "novella" entitled *Viaje Mejor* ("Travel Better"), which provides native Spanish-speakers an engaging and informative orientation to the TriMet transit system. The addition to the graphic novella included four pages of safety tips.

## BOARD MEMBERSHIP AND RECRUITMENT

TriMet relies on the oversight and guidance from diverse volunteers at every level of the agency's structure. The Board of Directors is comprised of volunteers who represent districts spanning the diversity of the agency's service district and are nominated by the Governor and confirmed by the Senate. To provide ongoing feedback on ADA, Transit Equity and Fiscal matters, the General Manager and Board seek guidance from three additional committees, (Committee on Accessible Transportation (CAT), Transit Equity Advisory Committee (TEAC) and General Manager Budget Taskforce). Members at each level are recruited to provide diverse perspectives necessary for holistic decision-making. Board membership is presented in Figure I-7 below.

**TITLE 49 CFR SECTION 21.5(B)(1)(VII) STATES THAT A RECIPIENT MAY NOT, ON THE GROUNDS OF RACE, COLOR, OR NATIONAL ORIGIN, "DENY A PERSON THE OPPORTUNITY TO PARTICIPATE AS A MEMBER OF A PLANNING, ADVISORY, OR SIMILAR BODY WHICH IS AN INTEGRAL PART OF THE PROGRAM." RECIPIENTS THAT HAVE TRANSIT-RELATED, NON-ELECTED PLANNING BOARDS, ADVISORY COUNCILS OR COMMITTEES, OR SIMILAR COMMITTEES, THE MEMBERSHIP OF WHICH IS SELECTED BY THE RECIPIENT, MUST PROVIDE A TABLE DEPICTING THE RACIAL BREAKDOWN OF THE MEMBERSHIP OF THOSE COMMITTEES, AND A DESCRIPTION OF EFFORTS MADE TO ENCOURAGE THE PARTICIPATION OF MINORITIES ON SUCH COMMITTEES.**

Body	# of Members	White*	Hispanic	Black*	Asian*	Native American*	Hawaiian Native and Pacific Islander*	Other*
<b>Population</b>	1,483,240	72.9%	12.1%	3.4%	7.0%	0.6%	0.5%	3.5%
<b>Board of Directors (*)</b>	7	50%	17%	33%	0%	0%	0%	0%
<b>Finance &amp; Audit Committee</b>	3	67%	0%	33%	0%	0%	0%	0%
<b>GM Budget Task Force</b>	12	66%	17%	17%	0%	0%	0%	0%
<b>Transit Equity Advisory Council</b>	17	24%	41%	35%	0%	0%	0%	0%
<b>Committee on Accessible Transportation</b>	15	86%	7%	7%	0%	0%	0%	0%

\*Non-Hispanic

FIGURE I-7 MEMBERSHIP OF COMMITTEES, COUNCILS, BROKEN DOWN BY RACE

### BOARD AND COMMITTEE RECRUITMENT

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

**Finance & Audit Committee** is made up of three Board members and assists the Board of Directors with oversight of TriMet's financial strategy and objectives, the integrity of TriMet's financial statements, the independent auditor's qualifications and independence, and TriMet's enterprise risk issues, programs, management practices and initiatives to ensure that systems and risk management tools are in place and functioning effectively. The Committee has an adopted charter, and an annually adopted work plan. The TriMet Board President appoints Board members to the Finance & Audit Committee.

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

**Transit Equity Advisory Committee (TEAC)** was organized in early May 2013 to extend the agency's outreach and involvement to transit dependent riders, as well as serve as a link to community organizations. TEAC also provides direction on the agency's transit equity strategy. The panel provides input and guidance on equity issues related to Title VI and Environmental Justice analysis, service planning, operational and capital investments, improving service to transit dependent riders, and disseminating information about transportation services to community-based organizations, social service agencies and community at large. Committee membership is appointed by the General Manager and currently consists of a 17-member panel with one TriMet Board Member.

**Committee on Accessible Transportation (CAT)** was formed in 1985 to advise the TriMet Board of Directors and staff on plans, policies and programs for seniors and people with disabilities. CAT has 15 community members: 8 seniors and/or people with disabilities who use TriMet, six representatives of seniors and/or people with disabilities, as well as one member of the TriMet Board of Directors. All CAT members are appointed by the General Manager for a two-year term. Membership recruitment process outreach includes: 1) general notification to service agencies and organizations that serve seniors and/or people with disabilities of all races; 2) general notification to mailing list of individuals/organizations who have expressed interest in the Committee's activities; 3) specific contacts from current committee members to individuals who may be interested in serving on the Committee; and 4) placement of recruitment notice in the "Public Notice" section of local newspaper.

## **SUBRECIPIENT MONITORING**

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

### **PROJECT OVERSIGHT**

TriMet's *Subrecipient Monitoring Procedures: Project Manager's Guide* details the project manager's role in monitoring subrecipient activities to ensure that federal awards are used for authorized purposes, in compliance with laws and regulations, provisions of contracts and agreements, and that all performance goals are achieved. Project managers are involved in grant award and ensure that the underlying agreements are in place and contain the appropriate federal language, certifications, and assurances. They also monitor monthly performance reports to ensure performance measures are achieved.

### **INDEPENDENT ASSESSMENTS**

The Grant Compliance Analyst performs independent assessments of subrecipients by conducting annual compliance reviews and reviewing annual audits, monthly performance reports, Title VI plans, Title VI annual reports, and sampling invoices.

Annual compliance reviews include assessments of oversight, financial management, performance monitoring, match, prevailing wage, equipment and real property management, Title VI, accessibility, disadvantaged business enterprises, procurement and contracting, suspension and debarment, maintenance procedures, equipment compliance certification, drug and alcohol testing, and lobbying.

Through the independent assessments the grant compliance analyst can identify areas where subrecipients need additional assistance and provide guides, examples, and references to assist with compliance. For example, the *Subrecipient's Guide to Title VI Compliance* (Attachment I) was developed to help subrecipients understand Title VI requirements and identify practical ways to document and implement strategies. Further, the Grant Compliance Analyst receives, monitors, and provides feedback on subrecipient Title VI programs.

### **ONGOING ASSISTANCE**

The TriMet project manager provides subrecipients with necessary support and monitoring throughout the grant cycle. Ongoing assistance is provided to subrecipients allowing them access to subject matter experts within TriMet to provide input, information, data, and guidance as needed. Specifically, TriMet has

- Provided demographic data to subrecipients to update their public participation and language assistance plans;
- Reviewed procurements and offered suggestions and solutions; and
- Provided federal contract language.

## SUBRECIPIENT TITLE VI PROGRAM REVIEW

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

Title 49 CFR Section 21.9(b) states that if

...A PRIMARY RECIPIENT EXTENDS FEDERAL FINANCIAL ASSISTANCE TO ANY OTHER RECIPIENT, SUCH OTHER RECIPIENT SHALL ALSO SUBMIT SUCH COMPLIANCE REPORTS TO THE PRIMARY RECIPIENT AS MAY BE NECESSARY TO ENABLE THE PRIMARY RECIPIENT TO CARRY OUT ITS OBLIGATIONS UNDER THIS PART.

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

To track Title VI compliance TriMet:

- Documents subrecipient compliance with the general requirements.
- Collects and maintain subrecipient Title VI program documents on a designated schedule.
- Forwards subrecipient Title VI information as requested by the FTA.

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

## FACILITIES SITING AND CONSTRUCTION

Other than in-progress projects such as PMLR which were subject to National Environmental Protection Act (NEPA) analysis and documentation under the rules in force at that time, TriMet has not constructed any facilities meeting the applicable definitions under Title VI during the covered fiscal years 2011, 2012, and 2013(since its prior 2010 Title VI Program submission.

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

IN DETERMINING THE SITE OR LOCATION OF FACILITIES, A RECIPIENT OR APPLICANT MAY NOT MAKE SELECTIONS WITH THE PURPOSE OR EFFECT OF EXCLUDING PERSONS FROM, DENYING THEM THE BENEFITS OF, OR SUBJECTING THEM TO DISCRIMINATION UNDER ANY PROGRAM TO WHICH THIS REGULATION APPLIES, ON THE GROUNDS OF RACE, COLOR, OR NATIONAL ORIGIN; OR WITH THE PURPOSE OR EFFECT OF DEFEATING OR SUBSTANTIALLY IMPAIRING THE ACCOMPLISHMENT OF THE OBJECTIVES OF THE ACT OR THIS PART.

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

**THE LOCATION OF PROJECTS REQUIRING LAND ACQUISITION AND THE DISPLACEMENT OF PERSONS FROM THEIR RESIDENCES AND BUSINESSES MAY NOT BE DETERMINED ON THE BASIS OF RACE, COLOR, OR NATIONAL ORIGIN.**

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

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

## **EQUITY ANALYSES**

TriMet considers possible equity impacts in developing potential service and fare changes, and evaluates proposals for major service changes and any fare changes for potential adverse effects, disparate impacts, and/or disproportionate burdens. TriMet's 2010 Title VI Program as submitted to the FTA included the equity analyses performed for major service changes implemented effective September 2010. Two reports that cover the equity evaluation of all major service changes and all fare changes implemented since September 2010 are provided as Attachments J and K:

- TriMet Title VI Transit Equity Impacts Assessment; Recommended Plan for Major Service Changes and Fare Changes; Effective September 2012
- TriMet Title VI Transit Equity Impacts Assessment; Recommended Service Changes; Line 47 Baseline/Evergreen and 48 Cornell; Effective September 2013

## PART II: TITLE VI POLICES

Federal Title VI requirements of the Civil Rights Act of 1964 were recently updated by the FTA and now require each large public transportation provider's governing board to approve policies and standards in regard to:

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

Proposed policies on Major Service Change, Disparate Impact, and Disproportionate Burden have been widely shared for public information, awareness, and comment, including a series of three community forums held across TriMet's service district. Information about the Title VI process, complaint procedures, and the proposed standards and policies have been made available via the TriMet website as well by calling the customer service phone number or emailing a dedicated email address.

These policies are now in the form recommended for the final review and action by the TriMet Board at the November 13, 2013 meeting. Each policy, definition and standard is presented in the following sections.

### MAJOR SERVICE CHANGE POLICY

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

A major service change is defined as:

1. A change in service of:
  - a. 25 percent or more of the number of route miles, or;
  - b. 25 percent or more of the number of revenue vehicle hours of service on a daily basis for the day of the week for which a change is made, or;
2. A new transit route is established.
3. If changes in service on a route to be effective at more than one date within any fiscal year would equal or exceed 1(a) and/or 1(b) above, the changes in total will be considered a major service change, and an equity analysis will be completed in advance of action on the proposed change.

The following service changes are exempted:

1. Standard seasonal variations in service are not considered major service changes.
2. In an emergency situation, a service change may be implemented immediately without an equity analysis being completed. An equity analysis will be completed if the emergency change is to be in effect for more than 180 days and if the change(s)

meet the definition of a Major Service Change. Examples of emergency service changes include but are not limited to those made because of a power failure for a fixed guideway system, the collapse of a bridge over which bus or rail lines pass, major road or rail construction, or inadequate supplies of fuel.

3. Experimental service changes may be instituted for 180 days or less without an equity analysis being completed. An equity analysis will be completed prior to continuation of service beyond the experimental period if the change(s) meet the definition of a Major Service Change.

### **PUBLIC PARTICIPATION AND BOARD APPROVAL**

Community Forum participants generally affirmed TriMet's current Major Service Change Policy. Changes to fares, frequency, route length, and hours of service can each have a significant and unique impact on riders' abilities to meet their travel needs. However, rather than providing input on TriMet's current 25 percent Major Service Change threshold, most participants described the significance of service changes in more subjective terms, focusing on individual impacts that may be difficult to measure at a macro scale. They emphasized the importance of engaging affected communities early and often, as well as providing information in a variety of ways to ensure that when service changes do occur, riders can plan for and adjust to them.

This input implores TriMet to consider equity in all decisions regarding service provision, fares, and investments in order to lessen negative impacts and ensure fair distribution of benefits to minorities, low-income populations, and others who rely most on transit. While TriMet's Title VI Program requires an Equity Analysis only when the Major Service Change threshold is met, the agency will strive to analyze equity impacts for less-than-major changes.

The Board approved the Major Service Change Policy at the November 13, 2013 meeting and the resolution is included in Attachment A. A summary of Community Forum comments and discussion is included in Attachment O.

## DISPARATE IMPACT POLICY

The Disparate Impact Policy establishes a threshold for determining whether a given action has a potential disparate impact on minority populations. Per FTA Circular 4702.1B:

**DISPARATE IMPACT REFERS TO A FACIALLY NEUTRAL POLICY OR PRACTICE THAT DISPROPORTIONATELY AFFECTS MEMBERS OF A GROUP IDENTIFIED BY RACE, COLOR, OR NATIONAL ORIGIN, WHERE THE RECIPIENT'S POLICY OR PRACTICE LACKS A SUBSTANTIAL LEGITIMATE JUSTIFICATION AND WHERE THERE EXISTS ONE OR MORE ALTERNATIVES THAT WOULD SERVE THE SAME LEGITIMATE OBJECTIVES BUT WITH LESS DISPROPORTIONATE EFFECT ON THE BASIS OF RACE, COLOR, OR NATIONAL ORIGIN...**

**THE POLICY SHALL ESTABLISH A THRESHOLD FOR DETERMINING WHEN ADVERSE EFFECTS OF [FARE/]SERVICE CHANGES ARE BORNE DISPROPORTIONATELY BY MINORITY POPULATIONS. THE DISPARATE IMPACT THRESHOLD DEFINES STATISTICALLY SIGNIFICANT DISPARITY AND MAY BE PRESENTED AS A STATISTICAL PERCENTAGE OF IMPACTS BORNE BY MINORITY POPULATIONS COMPARED TO IMPACTS BORNE BY NON-MINORITY POPULATIONS. THE DISPARATE IMPACT THRESHOLD MUST BE APPLIED UNIFORMLY... AND CANNOT BE ALTERED UNTIL THE NEXT TITLE VI PROGRAM SUBMISSION.**

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 including any populations that are minority *and* low-income (protected 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 otherwise 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 mitigate the adverse impact of the proposed action; measures that are the least discriminatory alternatives.

The Disparate Impact Policy defines measures for determination of potential disparate impact on protected populations due to adverse effects of a major service change or any change in fares. Adverse effects of service changes are defined as a decrease in the level of transit service (span in days and/or hours, and/or frequency) and/or decreased access to transit service defined as an increase of the access distance to beyond one-quarter mile of bus stops or one-half mile of rail stations.

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

## **MAJOR SERVICE CHANGES – ONE LINE**

A major service change to a line will be considered to have a disparate impact if condition

1. and either condition 2.(a) or 2.(b) below is found to be true:

1. 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, and;
- 2.(a) In the event of service reductions, the service change has an adverse effect on the minority population in the service area of the line.
- 2.(b) In the event of service additions, the addition is linked to other service changes that have adverse effects on the minority population in the service area of the line, or; the service addition on the subject line is linked with a service change(s) on other line(s) that have adverse effects on the minority population in the service area of that line or lines.

## **MAJOR SERVICE CHANGES – SYSTEM LEVEL**

To determine the system-wide impacts of service changes on more than one line, the percentage of impacted minority population (all impacted tracts) is compared to the percentage of impacted non-minority population. Comparisons of impacts between protected and other populations will be made for all changes for each respective day of service — weekday, Saturday, and Sunday.

If the percentage of impacted minority population differs from the percentage of impacted non-minority population by more than 20 percent, the overall impact of changes will be considered disparate.

## **FARE CHANGES**

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

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

## **PUBLIC PARTICIPATION AND BOARD APPROVAL**

Community Forum participants generally affirmed TriMet's current Disparate Impact Policy in that they did not offer suggestions for change. Rather, participants focused on a variety of equity issues as they relate to people of color and their experience on the transit system. The following topics were commonly discussed: personal safety; maintenance and quality of facilities in areas where people of color live; providing information in several languages; and TriMet's role in educating operators and riders on cultural competency.

The Board approved the Disparate Impact Policy at the November 13, 2013 meeting and the resolution is included in Attachment A. A summary of Community Forum comments and discussion is included in Attachment O.

## DISPROPORTIONATE BURDEN POLICY

This policy establishes a threshold for determining whether a given action has a potential disproportionate burden on low-income populations versus non-low-income populations. The Disproportionate Burden Policy applies only to low-income populations that are not also minority populations. Per FTA Circular 4702.1B:

THE POLICY SHALL ESTABLISH A THRESHOLD FOR DETERMINING WHEN ADVERSE EFFECTS OF [FARE/] SERVICE CHANGES ARE BORNE DISPROPORTIONATELY BY LOW-INCOME POPULATIONS. THE DISPROPORTIONATE BURDEN THRESHOLD DEFINES STATISTICALLY SIGNIFICANT DISPARITY AND MAY BE PRESENTED AS A STATISTICAL PERCENTAGE OF IMPACTS BORNE BY LOW-INCOME POPULATIONS AS COMPARED TO IMPACTS BORN BY NON-LOW-INCOME POPULATIONS.... THE DISPROPORTIONATE BURDEN THRESHOLD MUST BE APPLIED UNIFORMLY... AND CANNOT BE ALTERED UNTIL THE NEXT [TITLE VI] PROGRAM SUBMISSION.... AT THE CONCLUSION OF THE ANALYSIS, IF THE TRANSIT PROVIDER FINDS THAT LOW-INCOME POPULATIONS WILL BEAR A DISPROPORTIONATE BURDEN OF THE PROPOSED FARE [/SERVICE] CHANGE, THE TRANSIT PROVIDER SHOULD TAKE STEPS TO AVOID, MINIMIZE, OR MITIGATE IMPACTS WHERE PRACTICABLE. THE TRANSIT PROVIDER SHOULD DESCRIBE ALTERNATIVES AVAILABLE TO LOW-INCOME POPULATIONS AFFECTED BY THE FARE [/SERVICE] CHANGES.

In the course of performing a Title VI equity analysis for possible disproportionate burden, TriMet will analyze how the proposed major service change or fare change action could impact low-income populations as compared to non-low-income populations. The analysis of possible disproportionate burden and efforts to avoid, minimize, and mitigate adverse effects on low-income populations is important for planning service and fare changes and Environmental Justice considerations.

In the event low-income populations could bear a disproportionate burden of the adverse effects of a proposed major service or fare change, the finding would be of a potential disproportionate burden. Given a potential disproportionate burden, TriMet would take steps to avoid, minimize, or mitigate impacts where practicable, including identifying alternatives available to low-income riders adversely affected by service changes.

The Disproportionate Burden Policy defines measures for determination of potential disproportionate burden on low-income populations due to adverse effects of a major service change or any change in fares. Adverse effects of service changes are defined as a decrease in the level of transit service (span in days and/or hours, and/or frequency) and/or decreased access to transit service defined as an increase of the access distance to beyond one-quarter mile of bus stops or one-half mile of rail stations.

The determination of disproportionate burden associated with service changes is defined separately for impacts of changes on individual line, and for system-level impacts of changes on more than one line.

## **MAJOR SERVICE CHANGES – ONE LINE**

A major service change to a line will be considered to have a disproportionate burden if condition 1. and either condition 2.(a) or 2.(b) below is found to be true:

1. The percentage of impacted low-income population in the service area of the line exceeds the percentage of low-income population of the TriMet District as a whole, and;
2. (a) In the event of service reductions, the service change has an adverse effect on the low-income population in the service area of the line.
2. (b) In the event of service additions, the addition is linked to other service changes that have adverse effects on the low-income population in the service area of the line, or; the service addition on the subject line is linked with a service change(s) on other line(s) that have adverse effects on the low-income population in the service area of that line or lines.

## **MAJOR SERVICE CHANGES – SYSTEM LEVEL**

To determine the system wide impacts of service changes on more than one line, the percentage of impacted low-income population (all impacted tracts) is compared to the percentage for impacted non-low-income population. Comparisons of impacts between protected and other populations will be made for all changes for each respective day of service; weekday, Saturday, and Sunday.

If the percentage of impacted low-income population differs from the percentage of impacted non-low-income population by more than 20 percent, the overall impact of changes will be considered disproportionate.

## **FARE CHANGES**

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

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

## **PUBLIC PARTICIPATION AND BOARD APPROVAL**

Similarly to the Disparate Impact Policy, Community Forum participants generally affirmed TriMet's current Disproportionate Burden Policy. TriMet also asked participants for input on the agency's definition of low-income, which is currently at or below 150% Federal Poverty Level. With some exceptions this was seen as an acceptable level. Participants largely focused on the quality and maintenance of facilities in low-income areas as well as a desire to base fares on income. While an income-based fare may be outside the scope of Title VI, such input will influence the efforts of TriMet's Diversity and Transit Equity Department in the coming months.

The Board approved the Disproportionate Burden Policy at the November 13, 2013 meeting and the resolution is included in Attachment A. A summary of Community Forum comments and discussion is included in Attachment O.

## PART III: SYSTEM-WIDE SERVICE POLICIES AND STANDARDS

TriMet's long-term strategic priorities are to:

- 1) Build the Total Transit System;
- 2) Expand high-capacity transit;
- 3) Expand Frequent Service, and;
- 4) Improve local service.

Building the “Total Transit System” includes a safe and secure trip on frequent, reliable, and comfortable service, easy access to stops and stations, and clear customer information – while ensuring transit equity and environmental justice and moving toward sustainability.<sup>4</sup>

TriMet has established standards and policies for service including design, operations and the provision of facilities and other amenities. This framework includes standards and policies as set forward in FTA Circular 4702.1B covering:

Standards:      Vehicle Loads  
                    Service Frequency  
                    On-Time Performance  
                    Service Availability

Policies:         Distribution of Amenities  
                    Vehicle Assignment

These standards and policies assist in guiding the development and delivery of service in support of TriMet’s mission to make life better for our community by providing high-quality transit service that is safe, dependable, responsive, easy, and inviting.<sup>5</sup>

These standards and policies also provide benchmarks to ensure that service design and operations practices do not result in discrimination on the basis of race, color, or national origin. They establish a basis for monitoring and analysis of service delivery, availability, and the distribution of amenities and vehicles to determine whether or not any disparate impacts are evident.

Each standard and policy is described, following. Please refer to Part IV: Service Monitoring for a description of the current analysis of performance/outcomes for each respective standard and policy, comparing the service and amenities provided for minority and non-minority populations respectively, and the conclusions in regard to any disparate impacts.

### STANDARD - VEHICLE LOADS

Standards for passenger capacity as shown in Figure III-1 below are used to determine if a bus or train is overcrowded. Figure III-1 shows passenger capacities for buses, light rail cars, and commuter rail cars as the average maximum numbers of persons seated and standing during the peak one-hour in the peak direction. Maximum load factors represent the maximum achievable capacity, and are calculated by dividing the total capacity by the seated capacity of the vehicle.

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<sup>4</sup> TriMet Transit Investment Priorities FY 2014

<sup>5</sup> *Ibid.*

Vehicle passenger load is measured by the average load and the ratio of avg. load to seated capacity (load/seat ratio) during weekday a.m. peak, midday, and p.m. peak periods, respectively. Maximum load factors should not be exceeded during any period, including a.m. and p.m. peak periods on weekdays when highest passenger loads are typically experienced.

Bus and MAX loads are monitored using automatic passenger counters linked to vehicle location technology. WES passenger counts are taken by a train crew member.

#### Vehicle Capacities by Mode and Type

Vehicle Type	Passenger Capacities			
	Seated	Standing	Maximum Achievable Capacity	Maximum Load Factor
30-ft. Bus	28	2	30	1.1
40-ft. Bus	39	12	51	1.3
MAX Light Rail 2-Car Train	128	138	266	2.1
WES Commuter Rail - 1 Car Train	70	0	70	1.0
WES Commuter Rail - 2 Car Train	146	0	146	1.0

*Notes: All MAX operates as 2-car trains. WES may operate as a single-car or a 2-car train.*

FIGURE III-1 VEHICLE CAPACITIES BY MODE AND TYPE

### STANDARD-SERVICE FREQUENCY

Vehicle headway is the measurement of the frequency of service and is the scheduled time between two vehicles traveling in the same direction on the same line at a given location.

TriMet headway standards for lines designated as “Frequent Service” is that these lines should operate 15-minute or better service from early morning to late in the evening, seven days a week, with more frequency if needed to respond to passenger demands during peak periods.

In 2003 TriMet worked with stakeholders and adopted criteria to guide the expansion of Frequent Service. The most important factor in the criteria is potential ridership, but another consideration is the density of transit-dependent population as measured by proportion of low-income residents, seniors, or persons with disabilities. To meet the criteria for Frequent Service, a line must be projected to generate high ridership and serve areas with high employment/population density; areas with streets that are friendly to pedestrians and transit

service; areas with a high proportion of transit dependent population and activities, and areas that meet other criteria specified in TriMet's Transit Investment Priorities.

Twelve bus lines and all MAX lines are considered to be Frequent Service. There are no adopted headway standards for lines that do not meet the criteria for Frequent Service; however, at a minimum they should operate with headways of no more than 60 minutes during weekday peak periods.

How often service operates and for period of the day and week are key measures of service quality. Span of service is the total elapsed time from the beginning to the end of scheduled service on a line on weekdays, Saturday, and Sunday, respectively. Frequent Service lines are intended to operate every 15 minutes or better on weekdays from no later than 6 a.m. until 10:30 p.m. On weekends 15-minute service would begin by 8 a.m. and continue until 10:30 p.m.

TriMet firmly maintains its commitment to operating Frequent Service lines seven days a week, throughout the day. However, due to current budget restrictions, most Frequent Service bus lines are not providing 15-minute service throughout the day, but instead are operating every 17-20 minutes in non-rush hours and on weekends. MAX service frequency has also been reduced early morning, evening, and on weekends. This is expected to be a temporary condition, and TriMet's first priority for new operating resources as the economy recovers is to reinvest in these Frequent Service lines to operate every 15 minutes or better during the day, seven days a week.

As a first step on reinvestment in Frequent Service, as of March 2014 ten of 12 Frequent Service bus lines will be restored to every 15 minutes during midday hours on weekdays, and service restored to 15 minutes on weeknights and Saturdays on Line 4. The Line 4—Division/Fessenden and Line 72—Killingsworth/82nd Ave are already at Frequent Service levels during the midday hours.

Given that MAX lines and Frequent Service bus lines are designed and operated to serve maximum ridership, these lines also serve above-average shares of minority and poverty populations. Frequent Service bus lines and all MAX lines taken together 43 percent of the population of the TriMet Service District (about 640,000 of a total of 1.5 million). Among populations served by Frequent Service, 31 percent are minority and 29 percent are low-income as defined by TriMet. These shares are substantially greater than the overall minority (27 percent) and low-income (22 percent) population in the TriMet District.

## **STANDARD - ON-TIME PERFORMANCE**

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

## **STANDARD – SERVICE AVAILABILITY**

TriMet's standard for availability of service is that persons residing within one-half mile of bus stops and/or rail stations are considered served. Service availability is expressed as number and percentage of District-wide population and is determined by mode; for bus, MAX, and WES respectively. The calculation of distance is based on August 2013 stop locations and the centroids of 2010 Census block groups. There is no absolute standard for service availability; however the expectation in the context of Title VI is that the share of minority population within the TriMet District with service available should be no less than the share of non-minority populations with service available.

## **AMENITY PLACEMENT GUIDELINES**

TriMet has written guidelines that form a framework for the deployment of amenities as part of its projects and programs. The following sections briefly summarize the major policy documents that govern the deployment of amenities on TriMet transit system. Note that the use of the term amenities is limited to the Title VI definition for the purposes of this document. This section is generally organized by mode, but also includes a summary of customer information deployment policy. It should also be noted that project development often requires a scope of deliberation regarding amenities placement to include considerations not accounted for in these written policies.

### **BUS STOP GUIDELINES**

It is important that bus stops are easily identifiable, safe, accessible and a comfortable place to wait for the bus. TriMet's *Bus Stop Guidelines* identify elements of the TriMet bus stop, set guidelines for the design of bus stops and the placement of bus stop amenities, and describe the process for managing and developing bus stops.

### **SHELTER PLACEMENT**

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

### **STAND ALONE SEATING OPTIONS**

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

### **TRASH CAN PLACEMENT**

Trash cans are only placed at sheltered bus stops with high ridership and must not infringe upon the Americans Disability Act (ADA) pad or pedestrian pathway.

## **LIGHT RAIL (“MAX”) STATION DESIGN**

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

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

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

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

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

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

## **COMMUTER RAIL (“WES”) DESIGN**

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

## **CUSTOMER INFORMATION**

TriMet’s Design Criteria governs the design of light rail projects, is also a key reference for Commuter Rail, and contains the bulk of requirements for customer information items for signage and graphics. TriMet’s Bus Stops Guidelines govern the design of bus stops and contains considerations for customer information. Subsections below summarize typical customer information deployment practices by mode. In addition to these practices, TriMet also considers unique usage factors, transfer locations, service frequency, schedule reliability, special needs, and the specific location of a given stop along a route when identifying placement of customer information amenities.

## **Bus**

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

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

Pole-mounted information displays: Displays that include route number; route name; direction; simple route map; Stop ID number for use with TransitTracker by phone or m.trimet.org; and call-to-action and are placed at all bus stops without BCIDs or variable stop ID signs (complete implementation is expected as of December 2013).

Digital equipment such as next vehicle arrival times signs along bus routes are placed in complicated transit environments such as high traffic transit centers, the Portland Transit Mall, and private investment partnerships (e.g. Lloyd TMA).

## **LIGHT AND COMMUTER RAIL**

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Pylon information displays: two-side or four-sided displays that include the system map; rail-specific map; route schedules; Stop ID numbers for use with TransitTracker by phone or m.trimet.org; and call-to-action. These are placed at all MAX and WES stations.

Digital equipment such as next vehicle arrival times signs along rail/fixed guideway stations: these displays are included in all new stations built since 2004. a. Retrofitting of displays at stations that currently have no electronic information will begin in fall 2013, in approximate order of locations from higher to lower ridership .

## **VEHICLE ASSIGNMENT**

Vehicle assignment is described as follows by FTA Circular 4702.1B:

**VEHICLE ASSIGNMENT REFERS TO THE PROCESS BY WHICH TRANSIT VEHICLES ARE PLACED INTO SERVICE IN DEPOTS AND ON ROUTES THROUGHOUT THE TRANSIT PROVIDER'S SYSTEM. POLICIES FOR VEHICLE ASSIGNMENT MAY BE BASED ON THE AGE OF THE VEHICLE, WHERE AGE WOULD BE A PROXY FOR CONDITION. FOR EXAMPLE, A TRANSIT PROVIDER COULD SET A POLICY TO ASSIGN VEHICLES TO DEPOTS SO THAT THE AGE OF THE VEHICLES AT EACH DEPOT DOES NOT EXCEED THE SYSTEM-WIDE AVERAGE. THE POLICY COULD ALSO BE BASED ON THE TYPE OF VEHICLE. FOR EXAMPLE, A TRANSIT PROVIDER MAY SET A POLICY TO ASSIGN VEHICLES WITH MORE CAPACITY TO ROUTES WITH HIGHER RIDERSHIP AND/OR DURING PEAK PERIODS. THE POLICY COULD ALSO BE BASED ON THE TYPE OF SERVICE OFFERED. FOR EXAMPLE, A TRANSIT PROVIDER MAY SET A POLICY TO ASSIGN SPECIFIC TYPES OF VEHICLES TO EXPRESS OR COMMUTER SERVICE. TRANSIT PROVIDERS DEPLOYING VEHICLES EQUIPPED WITH TECHNOLOGY DESIGNED TO REDUCE EMISSIONS COULD CHOOSE TO SET A POLICY FOR HOW THESE VEHICLES WILL BE DEPLOYED THROUGHOUT THE SERVICE AREA.**

As ridership is the primary determinant of bus assignments, those communities with the greatest need for and use of transit generally are served by relatively newer vehicles. TriMet's fleet as of September 2013 includes 617 buses of which 465 are low-floor. All buses are equipped automated stop announcement systems. Low-floor buses are heavily deployed on Frequent Service and other high-ridership lines, so these buses carry a higher share of ridership than their proportion of the fleet.

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

TriMet's light rail fleet includes 127 train cars of which 101 are low-floor. All cars are equipped with air conditioning, and high-floor cars are always paired with a low-floor car to provide accessibility. Light rail cars are based at each of the two rail maintenance facilities (Ruby Junction and Elmonica) and are assigned to respective rail lines based on lines served by the facility, daily car availability, and operational efficiency.

TriMet's WES commuter rail fleet includes three self-powered diesel-multiple units (DMUs) and one "trailer" non-powered car. All cars were new and placed in operation with the start of WES service in 2009.

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

## PART IV: SERVICE MONITORING

TriMet monitors the performance of the system across all modes of service (Bus, MAX, WES) using methods described in FTA Circular 4702.1B. The analysis of performance for service standards on vehicle loads, service frequency, on-time performance, and policy on vehicle assignment compares the measures for “minority” bus lines and “non-minority” bus lines as defined by the FTA. TriMet includes all bus lines, a 100 percent sample, in comparisons of performance of “minority” and “non-minority” lines.

The analysis of performance for service availability and distribution of amenities compares measures for minority population and non-minority population in the TriMet Service District.

Among all 79 bus lines, 37 lines are classified as “minority” lines and 42 lines are “non-minority” lines. All MAX lines, and WES commuter rail are classified as “minority” lines. Minority and non-minority lines are shown in Figure IV-3.

The analysis finding for each service standard and policy is described, following. Please refer Part III: System-Wide Service Policies and Standards for a description of each respective standard and policy.

TriMet will be monitoring and evaluating performance in regard to these standards and policies annually. The evaluation will be performed and the results provided to the TriMet Board for review in the same timeframe as the adoption of the annual budget in advance of new fiscal year.

### VEHICLE LOADS

Standards for passenger capacity as shown in Figure IV-1 below are used to determine if a bus or train is overcrowded. Figure IV-1 shows passenger capacities for buses, light rail cars, and commuter rail cars as the average maximum numbers of persons seated and standing during the peak one-hour in the peak direction. Maximum load factors represent the maximum achievable capacity, and are calculated by dividing the total capacity by the seated capacity of the vehicle.

Figure IV-2 shows vehicle passenger loads on bus, MAX and WES, as measured by the ratio of avg. load to seated capacity (load/seat ratio) and average load. These comparisons are during weekday a.m. peak, midday, and p.m. peak periods, respectively.

### Vehicle Capacities by Mode and Type

Vehicle Type	Passenger Capacities			
	Seated	Standing	Maximum Achievable Capacity	Maximum Load Factor
30-ft. Bus	28	2	30	1.1
40-ft. Bus	39	12	51	1.3
MAX Light Rail 2-Car Train	128	138	266	2.1
WES Commuter Rail - 1 Car Train	70	0	70	1.0
WES Commuter Rail - 2 Car Train	146	0	146	1.0

*Notes: All MAX operates as 2-car trains. WES may operate as a single-car or a 2-car train.*

FIGURE IV-1 VEHICLE CAPACITIES BY MODE AND TYPE

### Vehicle Loads

Minority and Non-Minority Transit Lines

Weekday by Mode and Time Period

Spring 2013 Service

		Minority Lines		Non-Minority Lines	
Mode of Service	Time Period	Load/Seat Ratio	Mean Load	Load/Seat Ratio	Mean Load
Bus (39 seats)	AM Peak <sup>1</sup>	0.30	11.9	0.29	11.3
	Midday <sup>2</sup>	0.33	12.8	0.30	11.5
	PM Peak <sup>3</sup>	0.35	13.8	0.32	12.4
MAX Light Rail (128 seats)	AM Peak <sup>1</sup>	0.41	52.4	n/a	n/a
	Midday <sup>2</sup>	0.42	53.6	n/a	n/a
	PM Peak <sup>3</sup>	0.62	79.4	n/a	n/a
WES Commuter Rail (76 seats)	AM Peak <sup>1</sup>	0.33	25.4	n/a	n/a
	PM Peak <sup>3</sup>	0.46	35.0	n/a	n/a

Notes: <sup>1</sup> AM Peak = 7:00 - 8:59 am

<sup>2</sup> Midday = 9:00 am - 3:59 pm

<sup>3</sup> PM Peak = 4:00 - 5:59 pm

FIGURE IV-2 VEHICLE LOADS BY MINORITY AND NON-MINORITY TRANSIT LINES

## FINDINGS

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1. Observed load/seat ratios (load factors) range from .62 to .30 among all modes and across all time periods. All observed values are well under the maximum load factors for each mode of service.
2. Load/seat ratios among minority bus lines range from .30 for the a.m. peak period, .33 for midday, and .35 for p.m. peak period. Among non-minority bus lines the load/seat ratios are .29 for the a.m. peak period, .30 for midday, and .32 for p.m. peak period. Differences between observed loads on minority and non-minority bus lines are not considered as a disparity, as the difference is less than 10% (the equivalent of one or two occupied seats) and as observed loads on both groups of lines are well within standard.
3. MAX lines are classified as minority lines, so observed values are compared with the maximum load factor for MAX (2.1). On MAX, the observed load/seat ratios are .41 for the a.m. peak period, .42 for midday, and .62 for p.m. peak period. These values are well within standard.
4. WES is classified as a minority line, so observed values are compared with the maximum load factor for WES (1.0). On WES the observed load/seat ratios are .33 for the a.m. peak period, and .46 for p.m. peak period. These values are well within standard.
5. There are no disparate impacts on minority population in regard to vehicle loads on bus, MAX or WES.

## SERVICE FREQUENCY AND SPAN

The analysis of service frequency and span is by mode of service (bus, MAX, WES) and day of service (weekday, Saturday, Sunday). As shown in Figure IV-3 following, the frequency and time span of service is noted for minority and non-minority bus lines, with comparisons during each day and for weekday, Saturday, and Sunday.

## FINDINGS

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1. Service on minority bus lines is more frequent than service on non-minority lines during all weekday time periods.
2. Service frequency on minority bus lines is as or more frequent than on non-minority lines during all Saturday time periods.
3. Service frequency on minority bus lines is as or more frequent than on non-minority lines during all time Sunday periods with the sole exception of early a.m. (before 7:00 a.m.)
4. A higher proportion of minority lines operate on Saturday (67 percent) and Sunday (64 percent) than non-minority lines on Saturday (39 percent) and Sunday (32 percent)
5. The average span of service (hours from start to end of service) on minority bus lines exceeds the span of service on non-minority lines on weekdays, Saturdays, and Sundays.
6. There are no disparate impacts on minority population in regard to frequency or span of service on bus, MAX, or WES.

**Frequency and Span of Service**  
 Minority and Non-Minority Transit Lines by Mode and Day of Service  
 Weekday, Saturday, Sunday  
 Spring 2013 Service

Day of Service	Mode of Service	Line Classification	No. of Lines in Service	% of Weekday Lines in Service	Average Frequency of Service (mins.) *							Avg. Time Service Begins	Avg. Time Service Ends	Span of Service (hours)
					Early AM	AM Peak	Midday	PM Peak	Evening	Night				
<b>Weekday</b>	<b>Bus</b>	Minority Lines	37	100%	31	31	35	31	32	41	5:17	22:29	17.2	
		Non-Minority Lines **	41	100%	33	36	41	38	39	50	5:39	20:48	15.1	
		All bus lines	78	100%	32	34	38	34	36	45	5:28	21:39	16.2	
	<b>MAX Light Rail</b>	Minority Lines	4	100%	21	13	15	14	15	29	3:56	0:54	21.0	
	<b>WES Commuter Rail</b>	Minority Line	1	100%	30	30		30	30		5:21	20:02	9.1	
	<b>System</b>	Minority Lines	42	100%	27	25	26	25	26	33	4:51	19:06	15.8	
		Non-Minority Lines **	41	100%	33	36	41	38	39	50	5:39	20:48	15.1	
		All lines	83	100%	29	27	30	28	29	37	5:03	19:31	15.6	

Day of Service	Mode of Service	Line Classification	No. of Lines in Service	% of Weekday Lines in Service	Early AM	Average Frequency of Service (mins.) *			Avg. Time Service Begins	Avg. Time Service Ends	Span of Service (hours)
						Day	Evening	Night			
<b>Saturday</b>	<b>Bus</b>	Minority Lines	24	65%	42	35	35	44	6:11	23:18	17.1
		Non-Minority Lines **	16	39%	46	35	37	46	6:47	23:03	16.3
		All bus lines	40	51%	44	35	36	45	6:29	23:11	16.7
	<b>MAX Light Rail</b>	Minority Lines	4	100%	32	19	20	27	3:53	1:31	21.6
	<b>System</b>	Minority Lines	28	67%	37	27	28	35	5:02	0:24	19.4
		Non-Minority Lines **	16	39%	46	35	37	46	6:47	23:03	16.3
		All lines	44	53%	40	30	31	39	5:37	23:57	18.3

Day of Service	Mode of Service	Line Classification	No. of Lines in Service	% of Weekday Lines in Service	Early AM	Average Frequency of Service (mins.) *			Avg. Time Service Begins	Avg. Time Service Ends	Span of Service (hours)
						Day	Evening	Night			
Sunday	<b>Bus</b>	Minority Lines	23	62%	50	35	35	47	6:18	23:29	17.2
		Non-Minority Lines **	13	32%	40	38	39	48	7:10	23:08	16.0
		All bus lines	36	46%	45	37	37	47	6:44	23:18	16.6
	<b>MAX Light Rail</b>	Minority Lines	4	100%	35	21	22	27	4:39	0:52	20.2
	<b>System</b>	Minority Lines	27	64%	43	28	28	37	5:28	0:11	18.7
		Non-Minority Lines **	13	32%	40	38	39	48	7:10	23:08	16.0
		All lines	40	48%	42	31	32	41	6:02	23:50	17.8

Notes: \* Early AM = Start of service to 6:59 am

AM Peak = 7-8:59 am

Midday (weekday) = 9 am - 3:59 pm

Day (Saturday & Sunday) = 8 am - 5:59 pm

PM Peak = 4-5:59 pm

Evening = 6-7:59 pm

Night = 8 pm to end of service

\*\* Data excludes Line 83-Washington Park Loop which provides seasonal service May - October.

FIGURE IV-3 FREQUENCY AND SPAN OF SERVICE

## ON-TIME PERFORMANCE

TriMet continuously monitors on-time performance on bus and MAX through CAD-AVL systems, and by direct observation on WES. In this analysis, the on-time performance for bus lines is compared between minority and non-minority lines on weekdays, Saturday, and Sunday (Figure IV-4). Performance for MAX has been determined for weekday, Saturday and Sunday. WES commuter rail on-time data includes all service, weekdays.

### FINDINGS

1. Minority bus lines' on-time performance exceeds the performance of non-minority lines during weekdays (83.2 percent vs. 79.2 percent), Saturdays (79.7 percent vs. 78.1 percent) and Sunday (82.6 percent vs. 79.7 percent).
2. MAX on-time performance ranges from 85-87 percent by day of week.
3. WES on-time performance is above 98 percent.
4. There is no disparate impact on minority population in regard to bus on-time performance, and MAX lines' (also minority lines) performance is 3-5 percent higher than for bus service.

#### On-Time Performance

##### Minority and Non-Minority Transit Lines by Mode and Day of Service

Weekday, Saturday, Sunday

Spring 2013 Service

Mode of Service	Day	Avg. % On-Time		Difference; Minority to Non-Minority +/(−)
		Minority Lines	Non-Minority Lines	
Bus	Weekday	83.2%	79.2%	4.0%
	Saturday	79.7	78.1	1.6%
	Sunday	82.6	79.7	2.9%
MAX Light Rail	Weekday	86.5	n/a	n/a
	Saturday	84.6	n/a	n/a
	Sunday	85.3	n/a	n/a
WES Commuter Rail	Weekday	98.8	n/a	n/a

Notes: For Bus and MAX service, a vehicle is considered "on time" if it departs no more than 1 minute before to 5 minutes after the scheduled time. For WES, trains that arrive at the end-of-line stations (Beaverton Transit Center or Wilsonville) no more than 4 minutes before or after the scheduled time are considered "on time".

FIGURE IV-4 ON-TIME PERFORMANCE

## **SERVICE AVAILABILITY**

TriMet considers persons residing within one-half mile of bus stops and/or rail stations as having service available. Service availability is expressed as number and percentage of District-wide population and is determined by mode; for bus, MAX, and WES respectively. Figure IV-5 presents the availability of service by mode.

## **FINDINGS**

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1. The number and percent of minority population with service available exceeds the comparable values for non-minority populations for bus (85.1 percent vs. 84.2 percent, MAX (14.1 percent vs. 12.4 percent) and WES (0.5 percent vs. 0.4 percent).
2. There are no disparate impacts on minority population in regard to availability of service on bus, MAX or WES.

**Availability of Service By Mode**  
 Minority and Non-Minority Population  
 TriMet District  
 Spring 2013 Service

		Number and Percentage within 1/2 Mile of... <sup>3</sup>							
		TM District <sup>2</sup>		Bus		MAX		WES	
		Totals	%	Totals	%	Totals	%	Totals	%
<b>Population<sup>1</sup> (2010 Census)</b>		1,483,240	100.0%	1,261,642	85.1%	208,652	14.1%	7,722	0.5%
<b>Minority<sup>1</sup></b>	<b>All Minorities</b>	402,321	27.1%	351,470	87.4%	74,221	18.4%	3,682	0.9%
	Black (non-Hispanic)	50,962	3.4%	47,469	93.1%	10,752	21.1%	163	0.3%
	Hispanic	179,157	12.1%	159,161	88.8%	35,822	20.0%	2,683	1.5%
	Asian (non-Hispanic)	103,892	7.0%	84,995	81.8%	16,672	16.0%	443	0.4%
	Native American (non-Hispanic)	9,297	0.6%	8,159	87.8%	1,791	19.3%	49	0.5%
	Hawaiian Native and Pacific Islander (non-Hispanic)	6,682	0.5%	6,086	91.1%	1,257	18.8%	79	1.2%
	Other (Including Mixed Race, non-Hispanic)	52,331	3.5%	45,600	87.1%	7,927	15.1%	265	0.5%
<b>Non-Minority<sup>1</sup></b>	<b>White (Non-Hispanic)</b>	1,080,919	72.9%	910,172	84.2%	134,431	12.4%	4,040	0.4%

Notes: <sup>1</sup> Figures relating to minority/non-minority populations and associated totals are from the 2010 Census and within 2013 District boundary

<sup>2</sup> TriMet Service District totals and by population subgroup are based on the boundary as of August 2013.

<sup>3</sup> Distance calculations based on August 2013 stop and station locations and centroids of 2010 Census block groups.

FIGURE IV-5 AVAILABILITY OF SERVICE BY MODE

## DISTRIBUTION OF AMENITIES

The amenity inventory used in this analysis comes from TriMet's amenity database. The TriMet Service District boundary and transit routes data are from TriMet GIS, and supplementary data, such as streets and waterways, are via Oregon Metro's RLIS dataset.

All TriMet bus and rail lines have been classified as "minority" and "non-minority." In this case, an amenity is classified as "minority" if *any* of the lines it serves have been designated as a minority line and "non-minority" if *all* the lines that it serves are non-minority lines. Figure IV-6 shows the average ratio of amenities per stop for minority and non-minority lines.

Part V Demographic Analysis includes maps of existing facilities and amenities in relationship to transit lines, minority population and low income population (Figures V-20, V-21, and V-22). These maps generally illustrate that there is a somewhat higher number of amenities on minority lines than on non-minority lines. Moreover, Figure IV-6 following shows that minority lines have, on average, a higher number of amenities per stop than non-minority lines across all but one of the categories of amenities. In the category including all signs, maps, and schedules, the comparison between minority lines (.67) and non-minority lines (.77) represents a difference of 13 percent, and is within the non-disparate range at the system level.

Amenities Per Stop Minority and Non-Minority Lines		
Category of Amenity	Average for Minority Lines	Average for Non-Minority Lines
Seating	.37	.29
Elevators	.01	n/a *
Digital Displays	.09	.03
Shelters	.28	.23
Signs, Maps and/or Schedules	.67	.77
Waste Receptacles	.23	.16

\*all elevators serving TriMet system are on lines classified as "minority"

FIGURE IV-6 AMENITIES PER STOP

## FINDINGS

1. The ratio of amenities per stop on minority lines exceeds the comparable ratio for non-minority lines in all categories examined with the exception of the signs, maps, schedules group.
2. The difference in values for signs, maps, and schedules between minority and non-minority lines is 13 percent and within the non-disparate range at the system-level.
3. There is no disparate impact on minority population in regard to the distribution of amenities.

## VEHICLE ASSIGNMENT

In regard to assessing the results of TriMet's vehicle assignment practices in the context of Title VI, the expectation is that the average age of vehicles on "minority lines" should be no more than the average age of vehicles on "non-minority lines." Vehicle assignment is presented in Figure IV-7.

Vehicle Assignment			
Average Age of Vehicles Assigned by Mode			
Spring 2013 Service			
	Average Age of Vehicles Assigned (Years)		
Mode of Service	Minority Lines	Non-Minority Lines	Difference; Minority to Non-Minority +/(-)
Bus	14.5	16.4	-1.9
MAX Light Rail	14.8	n/a	n/a
WES Commuter Rail	4.7	n/a	n/a

FIGURE IV-7 VEHICLE ASSIGNMENT BY MODE

## FINDINGS

4. The average age of vehicles on minority lines (14.5 years) is less than the average age of vehicles on non-minority lines (16.4 years).
5. The average age of vehicles on MAX (14.8 years) and WES (4.7 years) is comparable or less than the average age of vehicles on minority bus lines.
6. There are no disparate impacts on minority population in regard to vehicle assignment on bus, MAX or WES.

## SUMMARY – FINDINGS FOR ALL SERVICE STANDARDS AND POLICIES

As detailed in the preceding sections of Part IV: Service Monitoring the analysis of service performance and outcomes in distribution of amenities and vehicles shows no disparate impacts for minority populations in regard to any service standard or policy on any mode (Bus, MAX,, WES). Figure IV-8 provides a checklist of the results from this evaluation of 2013 operations and amenities data.

Evaluation and Findings – Service Standards and Policies				
Comparison of Minority and Non-Minority Lines				
Spring 2013 Service				
	Mode of Service			
	Bus	MAX	WES	System
Service Standards				
<i>Vehicle Loads</i>	✓	✓	✓	✓
<i>Service Frequency &amp; Span</i>	✓	✓	✓	✓
<i>On-Time Performance</i>	✓	✓	✓	✓
<i>Service Availability</i>	✓	✓	✓	✓
Distribution of Amenities				
<i>Seating</i>				✓
<i>Elevators</i>				✓
<i>Digital Displays</i>				✓
<i>Shelters</i>				✓
<i>Signs, Maps and/or Schedules</i>				✓
<i>Waste Receptacles</i>				✓
Vehicle Assignment	✓	✓	✓	✓
✓ = No Disparity in Performance or Distribution				

FIGURE IV-8 EVALUATION AND FINDINGS – SERVICE STANDARDS AND POLICIES

## PART V: DEMOGRAPHIC ANALYSIS

TriMet uses demographic data to assess equity in distribution of services, facilities, and amenities in relation to minority, low-income, and limited English proficient populations. Such data informs TriMet in the early stages of service, facilities, and programs planning and enables TriMet to monitor ongoing service performance, analyze the impacts of policies and programs on these populations and take appropriate measures to avoid or mitigate potential disparities. TriMet develops GIS maps and overlays and comparative charts to perform this analysis, relying on both ridership and population data within the service area. The demographic data shown in this report is from the following sources:

- 2010 Census
- 2007-2011 American Community Survey
- 2012 TriMet On-board Fare Survey

## CURRENT SERVICE AND SERVICE AREA

The following compilation of maps as required for TriMet's Title VI Program display the distribution of minority low-income, and LEP populations in relation to the distribution of facilities and services throughout the TriMet service area and Portland metropolitan region.

Service and Service Area in Figure V-1 shows all TriMet bus and rail lines, differentiated by Frequent Service lines and Standard or Rush Hour-only service lines.

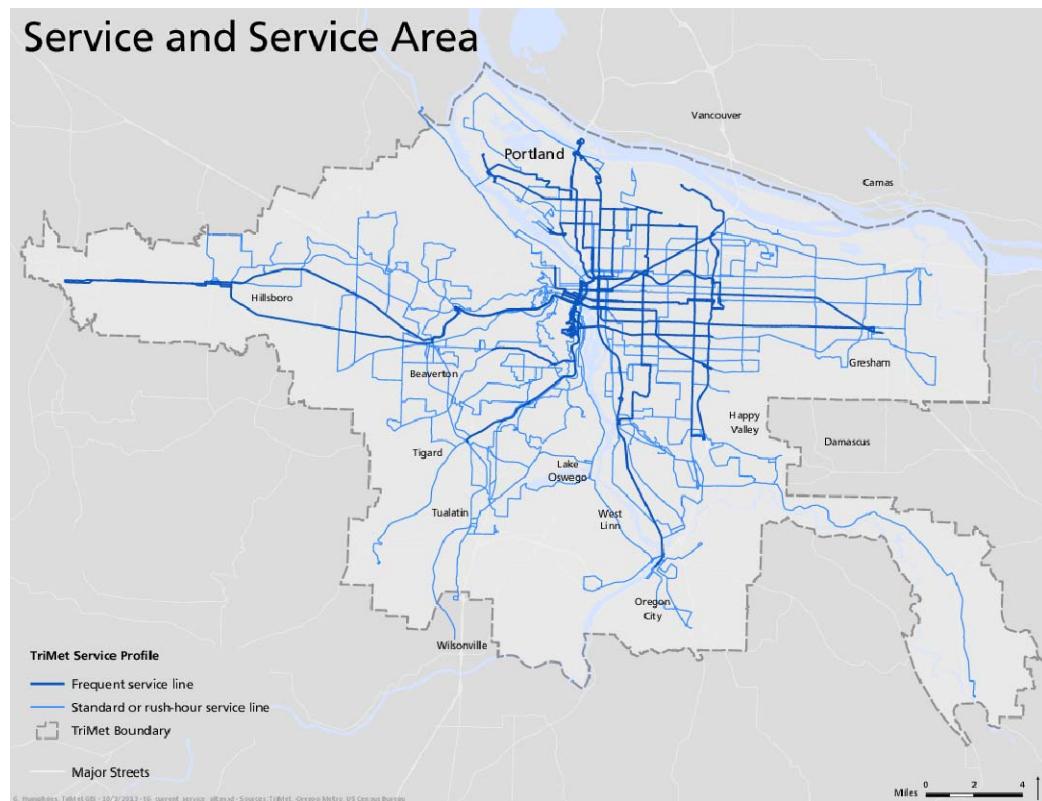
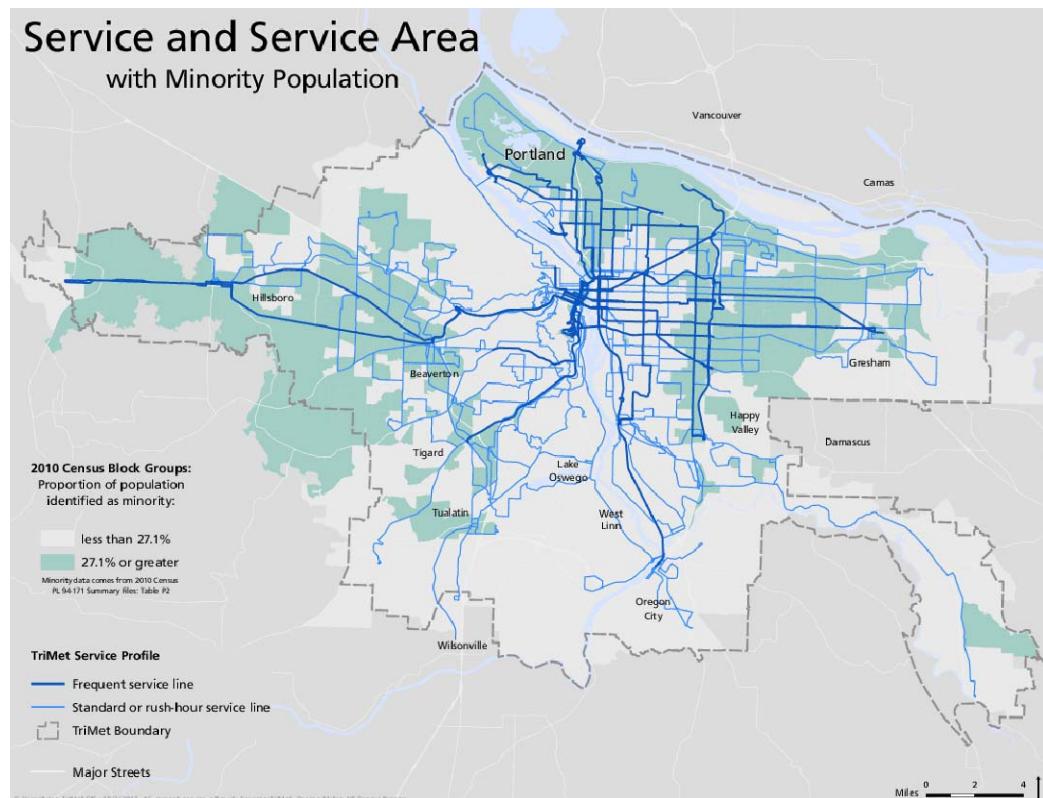


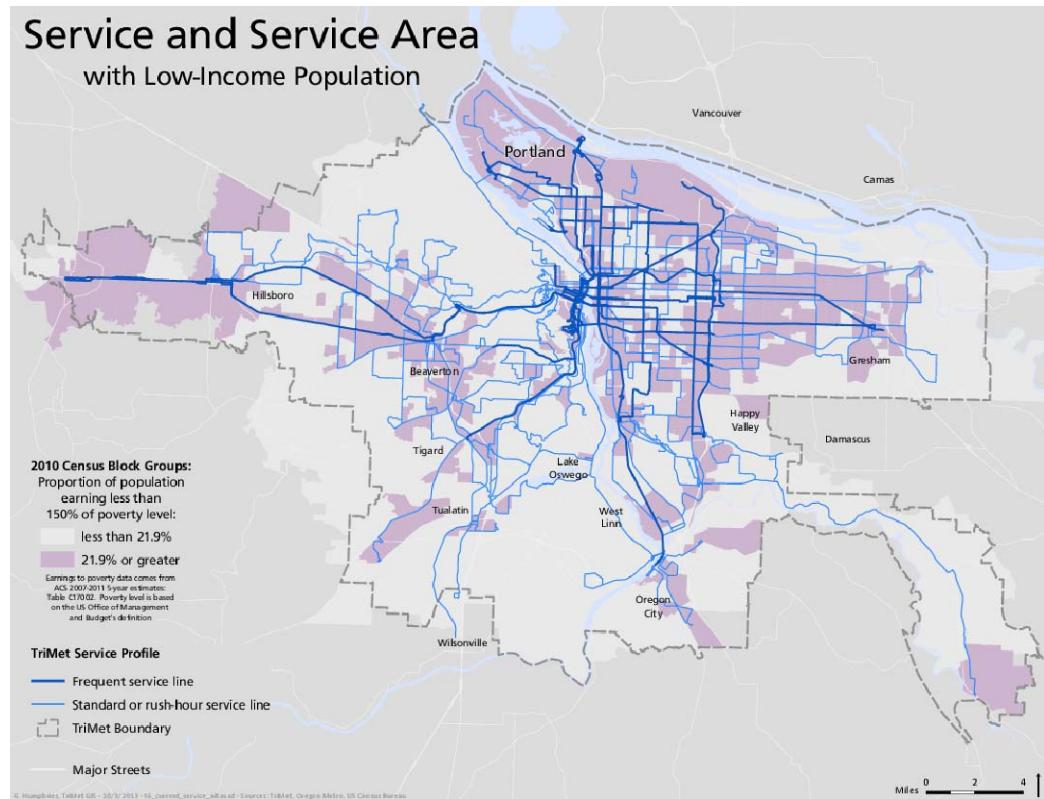
FIGURE V-1 SERVICE AND SERVICE AREA

Service and Service Area with Minority Population in Figure V-2 depicts the service network in relation to minority population by Census Block Group. Areas are shaded corresponding to block groups which had a minority population greater than or equal to the average for the TriMet District (27.1 percent), and block groups which had minority population less than the 27.1 percent average. While some block groups in Portland's central core have above average minority populations, most live areas with above-average concentration of minority population are widely distributed across the western, eastern, and northern parts of the service area.



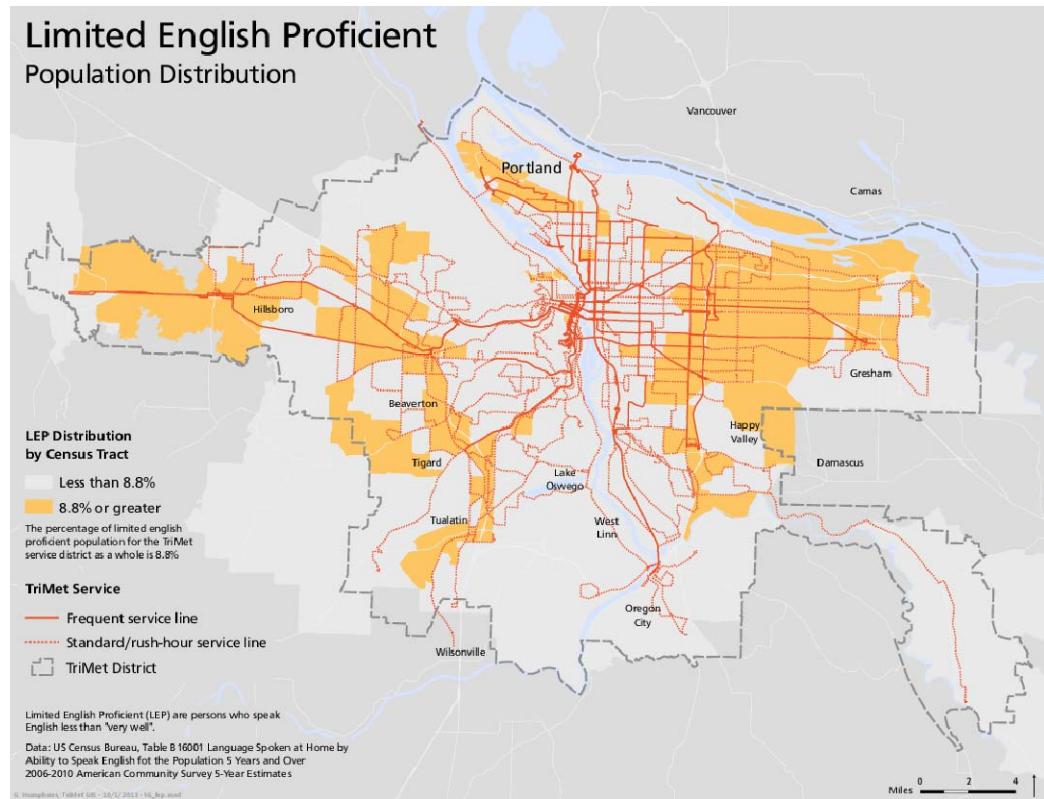
**FIGURE V-2 SERVICE AND SERVICE AREA WITH MINORITY POPULATION**

Service and Service Area with Low-Income Population in Figure V-3 depicts the service network in relation to low-income population by Census Block Group. Low-income is defined as earning equal to or less than 150 percent of the Federal DHHS Poverty Level. Areas are shaded corresponding to block groups which had low-income population greater than or equal to the average for the TriMet District (21.9 percent); and block groups which had a low-income population less than the 21.9 percent average. High concentrations of low-income households are found throughout the service area.



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

Limited English Proficient (LEP) Population Distribution in Figure V-4 depicts the service network in relation to LEP population by Census Tract, as language information is not available at a smaller geographic scale. Limited English Proficiency is defined as persons who report speaking English less than “very well” in the ACS. Areas are shaded corresponding to census tracts which had a LEP population greater than or equal to the average for the TriMet District (8.8 percent); and census tracts which had a LEP population less than the 8.8 percent average. Similar to the map of minority population, most above-average LEP census tracts are located in the western, eastern, and northern parts of the service area.



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

## PROXIMITY TO SERVICE

TriMet performed a demographic analysis of proximity to TriMet Service in and the information in Figure V-5 shows population counts and percentages of those within half mile of service by race/ethnicity and low income. This is also delineated by type of service, e.g., bus, MAX, and WES; and Frequent Service bus and MAX. Of note, a greater percentage of minorities and low-income populations are located within half mile of all forms of service than the population as a whole. Relative to other racial/ethnic groups, the black non-Hispanic population has the highest percentage of minority persons within half mile of bus and MAX service. For the WES commuter rail line, Hispanic population makes up the largest share of minority population served.

Demographic Analysis of Proximity to TriMet Service (Raw Count)		TM District	Number within 1/2 Mile of...			Frequent Service	
			Totals	Bus	MAX	WES	Bus
Population <sup>1</sup>	Total (2010 Census)	1,483,240	1,261,642	208,652	7,722	556,493	638,806
Minority <sup>1</sup>	All Minorities	402,321	351,470	74,221	3,682	163,544	196,218
	Black (non-Hispanic)	50,962	47,469	10,752	163	29,980	34,012
	Hispanic	179,157	159,161	35,822	2,683	72,752	89,647
	Asian (non-Hispanic)	103,892	84,995	16,672	443	32,862	40,334
	Native American (non-Hispanic)	9,297	8,159	1,791	49	4,156	4,828
	Hawaiian Native and Pacific Islander (non-Hispanic )	6,682	6,086	1,257	79	2,799	3,344
	Other (Including Mixed Race, non-Hispanic)	52,331	45,600	7,927	265	20,995	24,053
Non-Minority <sup>1</sup>	White (Non-Hispanic)	1,080,919	910,172	134,431	4,040	392,949	442,588
Population <sup>2</sup>	Total (ACS 5 Year Estimate, 2007-2011)	1,446,637	1,230,115	196,251	6,733	541,939	620,736
Income <sup>2</sup>	Below 150% of Poverty Level	317,439	288,598	63,792	2,641	153,998	178,276

Demographic Analysis of Proximity to TriMet Service (Percent)		TM District	Percent within 1/2 Mile of...			Frequent Service	
			Totals	Bus	MAX	WES	Bus
Population <sup>1</sup>	Total (2010 Census)	1,483,240	85.1%	14.1%	0.5%	37.5%	43.1%
Minority <sup>1</sup>	All Minorities	402,321	87.4%	18.4%	0.9%	40.7%	48.8%
	Black (non-Hispanic)	50,962	93.1%	21.1%	0.3%	58.8%	66.7%
	Hispanic	179,157	88.8%	20.0%	1.5%	40.6%	50.0%
	Asian (non-Hispanic)	103,892	81.8%	16.0%	0.4%	31.6%	38.8%
	Native American (non-Hispanic)	9,297	87.8%	19.3%	0.5%	44.7%	51.9%
	Hawaiian Native and Pacific Islander (non-Hispanic)	6,682	91.1%	18.8%	1.2%	41.9%	50.0%
	Other (Including Mixed Race, non-Hispanic)	52,331	87.1%	15.1%	0.5%	40.1%	46.0%
Non-Minority <sup>1</sup>	White (Non-Hispanic)	1,080,919	84.2%	12.4%	0.4%	36.4%	40.9%
Population <sup>2</sup>	Total (ACS 5 Year Estimate, 2007-2011)	1,446,637	85.0%	13.6%	0.5%	37.5%	42.9%
Income <sup>2</sup>	Below 150% of Poverty Level	317,439	90.9%	20.1%	0.8%	48.5%	56.2%

Notes: <sup>1</sup> Figures relating to minority/non-minority populations and associated totals come from the 2010 Census

<sup>2</sup> Figures relating to income and the poverty level come from the American Community Service (ACS) 5 year estimates for the years 2007-2011

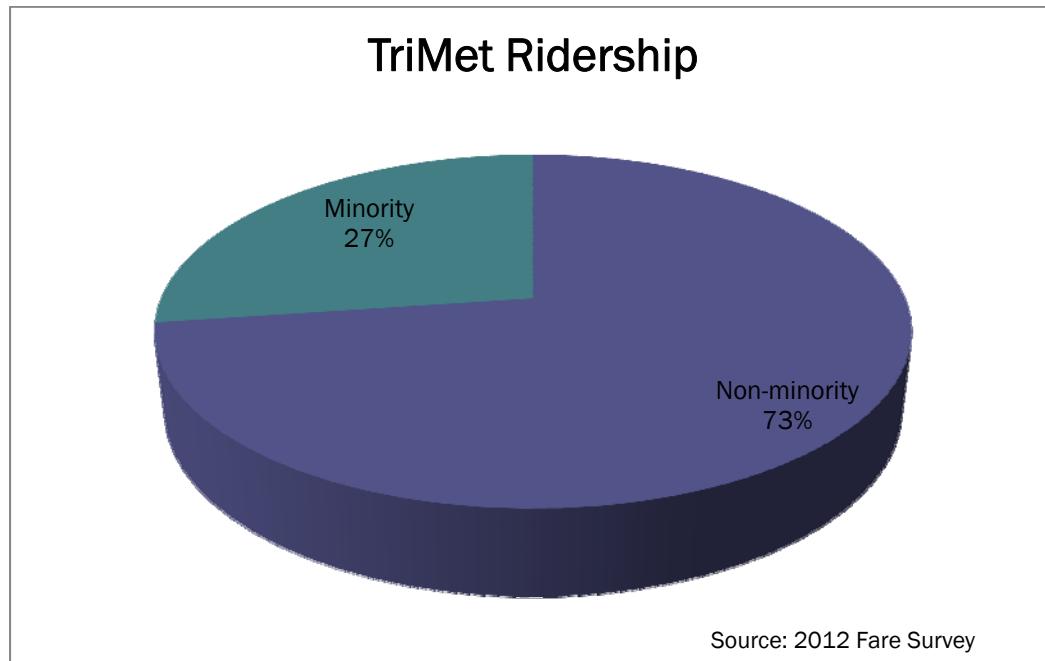
**Other data sources and methodology:** Distance calculations based on August 2013 stop locations and centroids of 2010 Census block groups. The TriMet service district totals are based on the boundary current to August 2013. Population totals for the TriMet district vary between between statistics for race and income/poverty in part due to the fact that the Census is a full count and the ACS is an extrapolation based on a sample, and in part because the ACS total excludes those whom poverty status is not determined

FIGURE V-5 DEMOGRAPHIC ANALYSIS OF PROXIMITY TO TRIMET SERVICE

## RIDERSHIP DEMOGRAPHICS

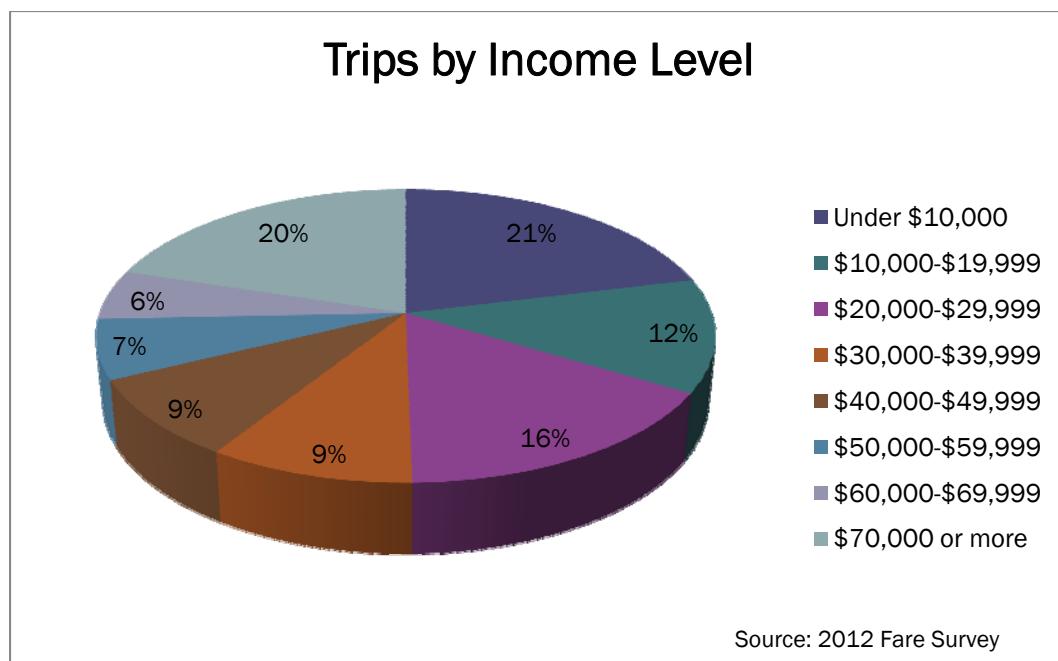
TriMet Rider Demographic Profile data presented in Attachment L uses the TriMet 2012 Fare Survey data to provide a snapshot of riders in terms of race/ethnicity, limited English proficiency (LEP), and household income.

TriMet's ridership is mostly non-minority; however, the percentage of trips made by minorities (27.2 percent) is nearly identical to the TriMet service area's minority population of 27.1 percent (Figure V-6).



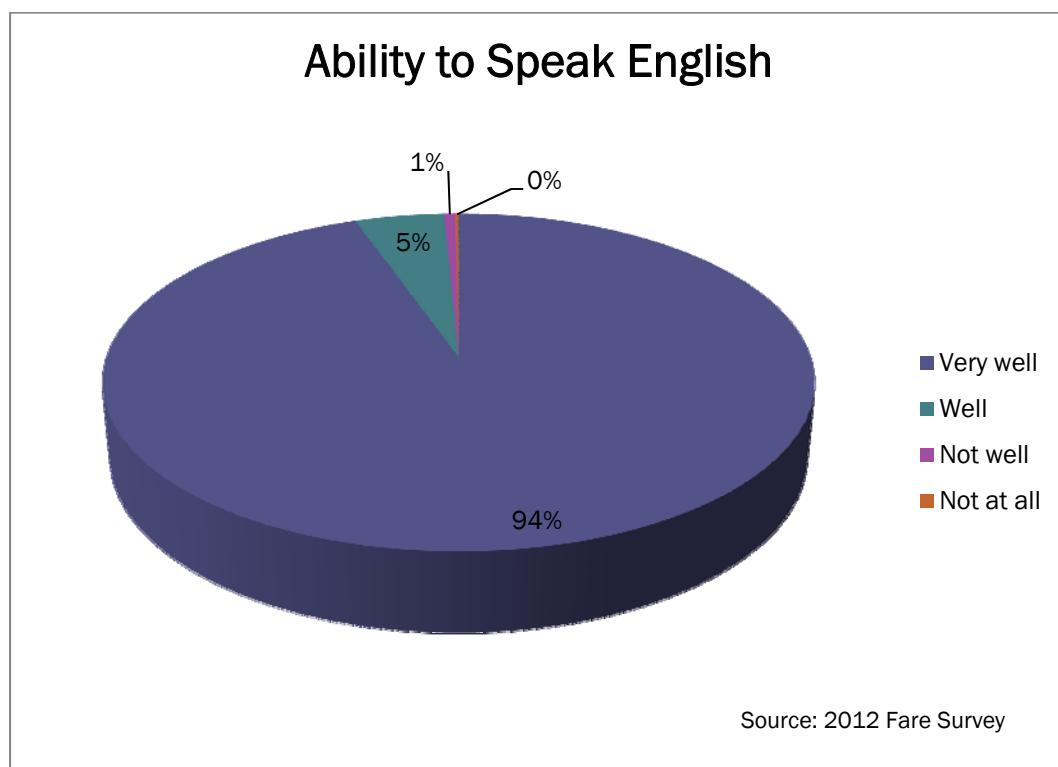
**FIGURE V-6 TRIMET RIDERSHIP**

Figure V-7 shows that approximately 50 percent of trips are made by riders in households with incomes under \$30,000.



**FIGURE V-7 TRIPS BY INCOME LEVEL**

Figure V-8 shows that about seven percent of survey responses indicated that they speak English less than “very well,” which is less than the service area LEP population of 8.8 percent.



**FIGURE V-8 RIDERSHIP ABILITY TO SPEAK ENGLISH**

## TRIP CHARACTERISTICS OF MINORITY AND NON-MINORITY RIDERS

Trip Characteristics for Minority and Non-minority Riders in Attachment M uses data from TriMet's 2012 On-board Fare Survey to compare trip differences between the two groups. Minority (all non-white and/or Hispanic trips) differ from non-minority (white non-Hispanic) trips in several ways.<sup>6</sup>

Ridership data shows that more non-minorities have access to a vehicle that they could have used to make the trips instead of TriMet. Figure V-9 Access to Vehicle shows that 63 percent of minorities did not have access to another vehicle.

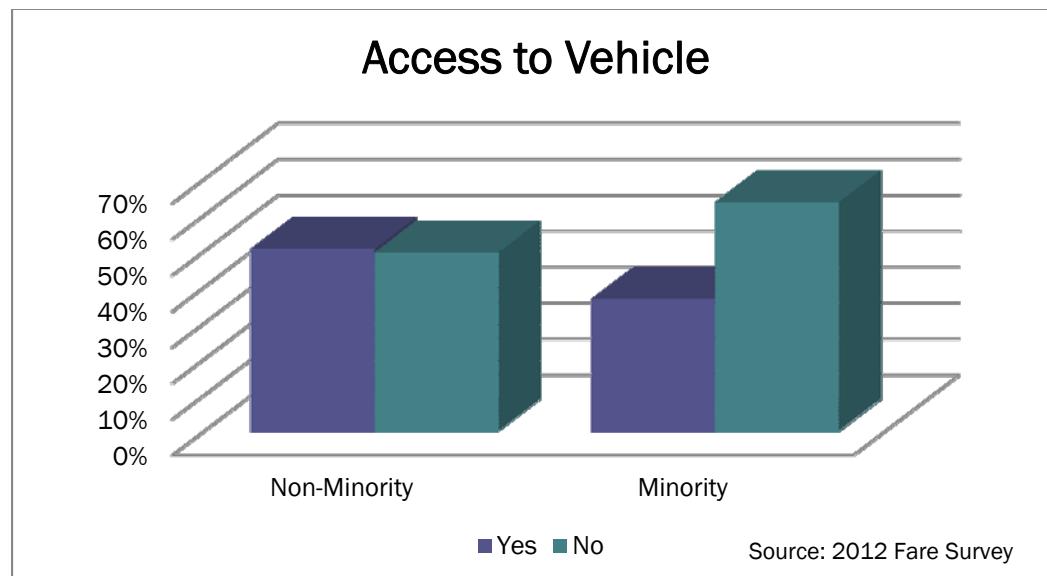
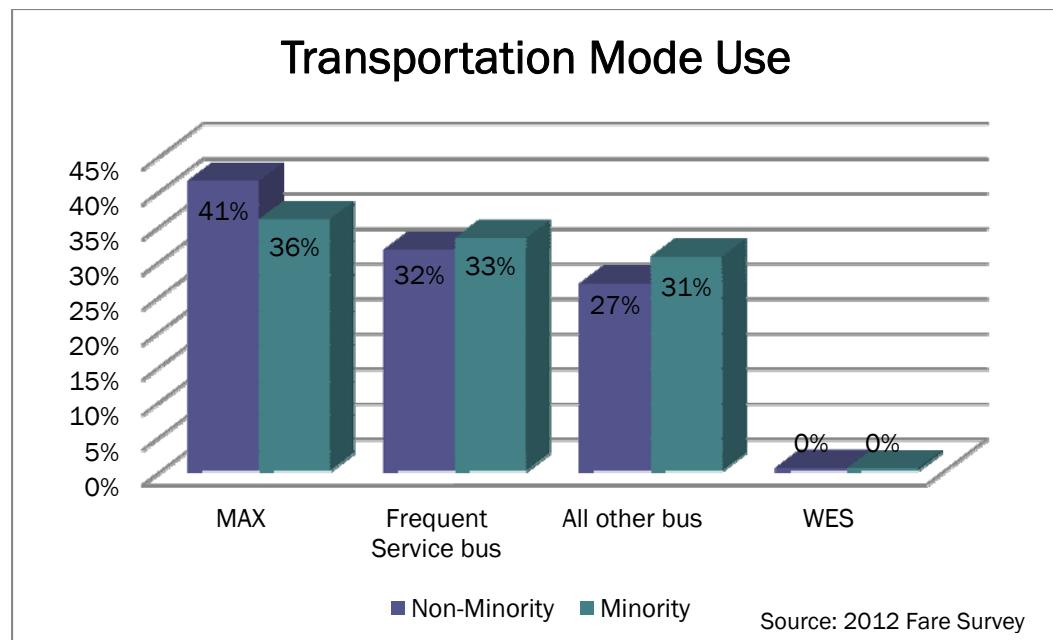


FIGURE V-9 ACCESS TO VEHICLE

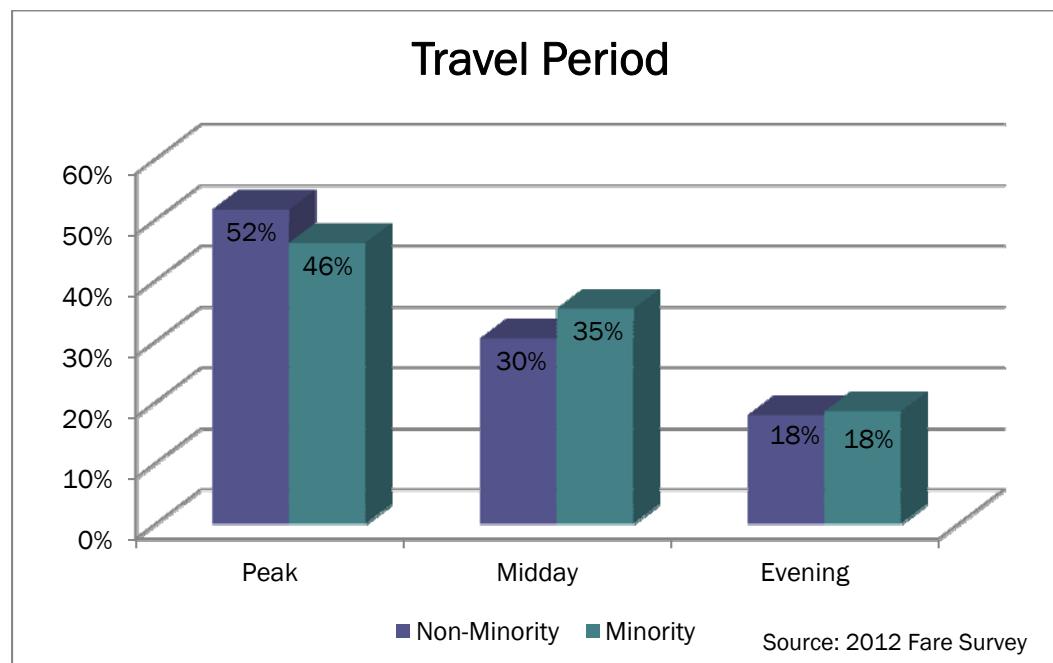
Additionally, as shown in Figure V-10 non-minorities took more rides on MAX than minority riders. Both groups more commonly took the bus overall, but minorities had a greater percentage of trips by bus than non-minorities. The same can be said about travel periods (Figure V-11) with six percent difference during peak travel times<sup>7</sup> and five percent difference during midday travel.

<sup>6</sup> Reported differences meet the standard of statistical significance at the 95% confidence level

<sup>7</sup> The peak periods are defined as travel between 6-9 AM and 3-6 PM.

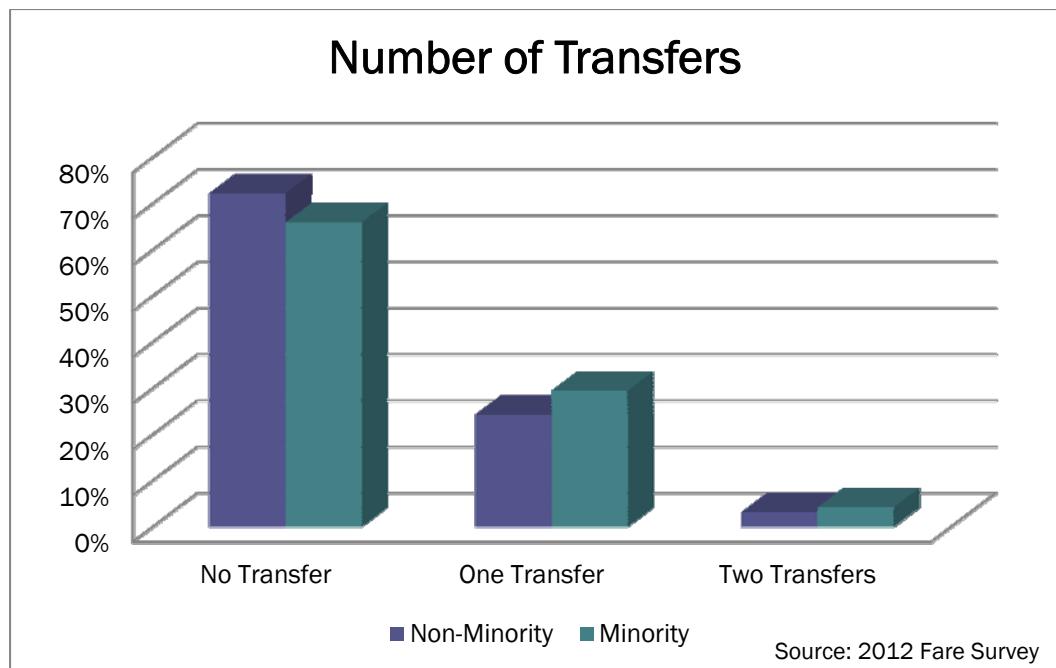


**FIGURE V-10 TRANSPORTATION MODE USE**



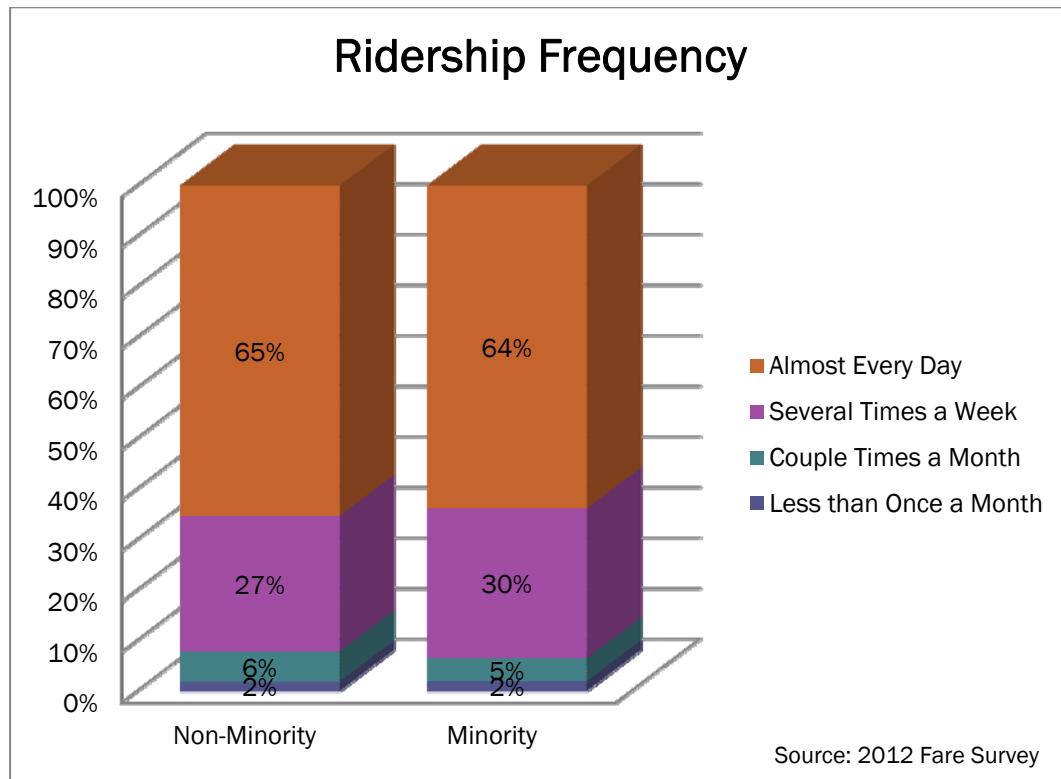
**FIGURE V-11 TRAVEL PERIOD**

Additionally more minorities transfer one or more times to complete a one-way trip than non-minorities (Figure V-12)

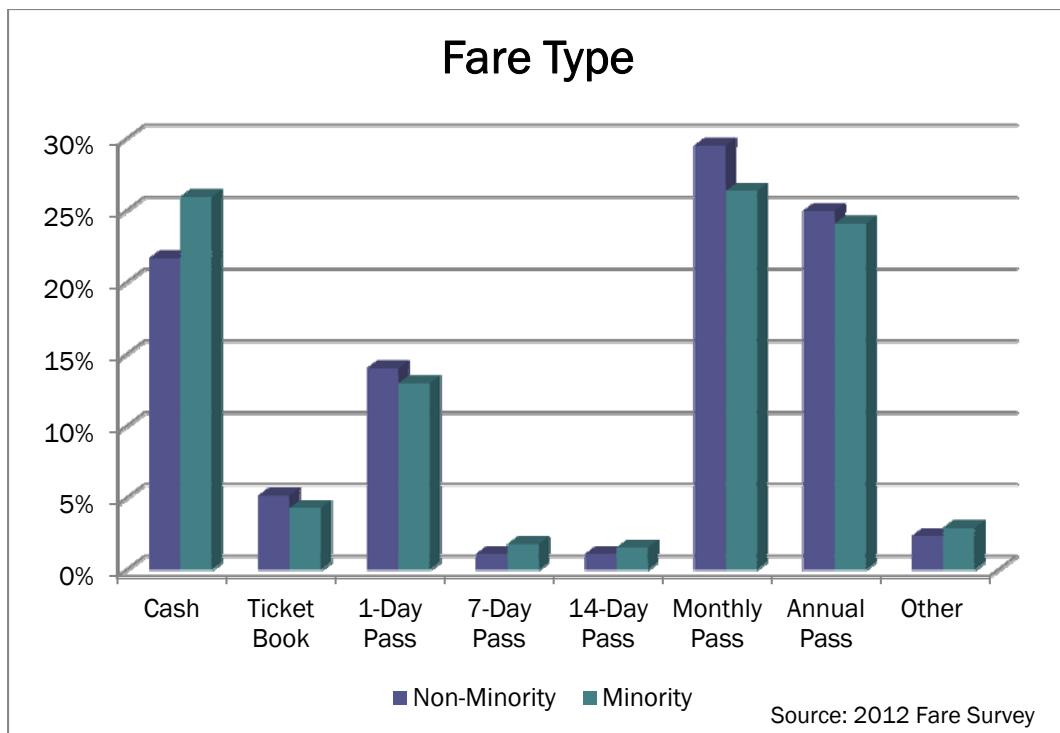


**FIGURE V-12 NUMBER OF TRANSFERS**

Additionally, minorities are more frequent riders than non-minorities (Figure V-13) and purchase a cash fare four percent more than non-minorities (Figure V-14).

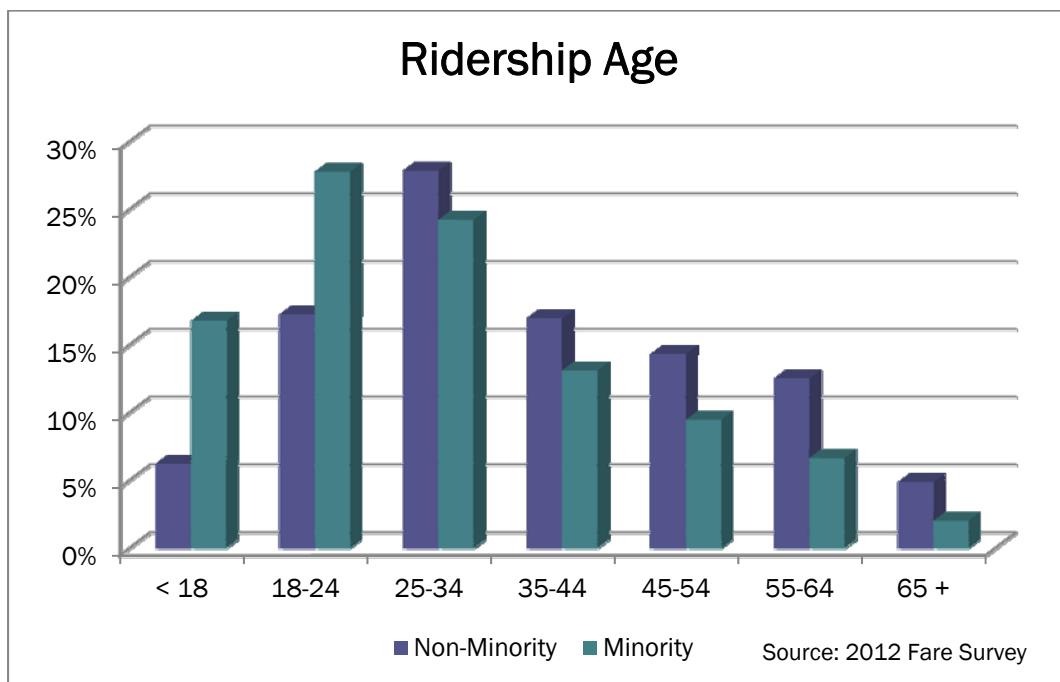


**FIGURE V-13 RIDERSHIP FREQUENCY**



**FIGURE V-14 FARE TYPE**

Ridership age and annual household income also differ between minorities and non-minorities. About 45 percent of minority ridership is under age 25, as compared to 23 percent of non-minorities (Figure V-15).



**FIGURE V-15 RIDERSHIP AGE**

The annual household income of TriMet ridership presented in Figure V-16 shows a difference in the income levels of non-minorities and minorities. The largest gaps exist between minorities and non-minorities at the lowest and highest income levels (under \$10,000 and \$70,000 or more, respectively).

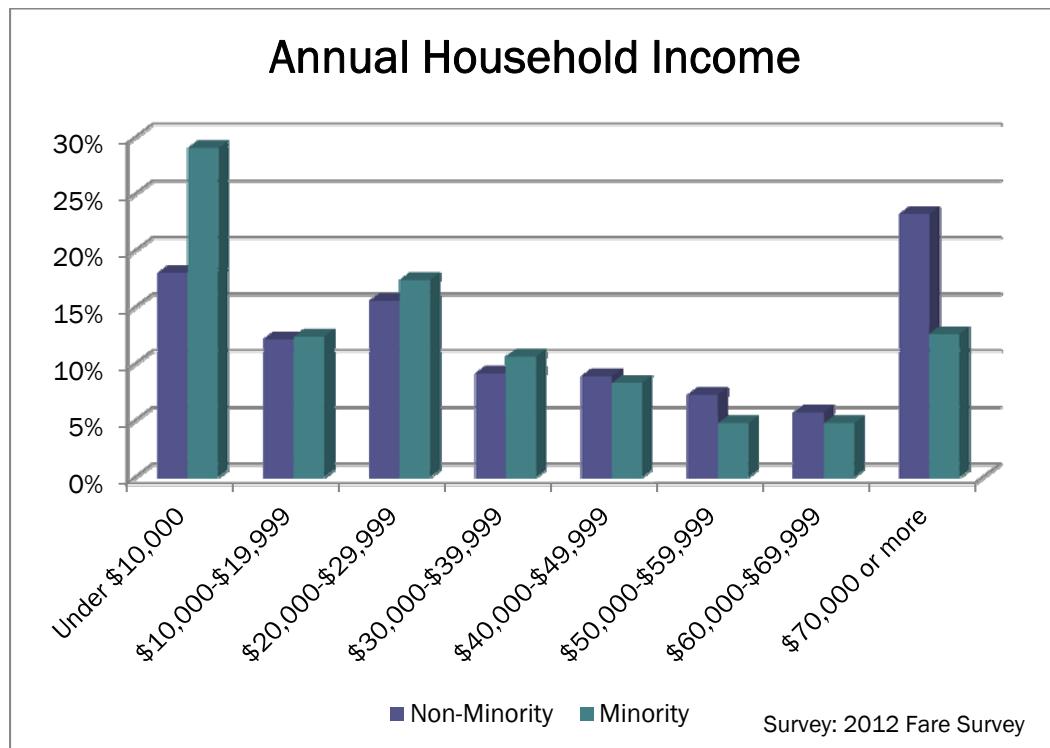


FIGURE V-16 ANNUAL HOUSEHOLD INCOME

## FARE PAYMENT

Fare Payment by Household Income in Attachment N shows the type and cost of fares paid on trips taken by riders from different income groups. Based on the 2012 On-board Fare Survey, this attachment illustrates that as income level goes down, percentage of fares paid using cash go up. One-day pass usage is generally higher for lower-income riders, as is monthly/30-day pass usage. Annual passes are more commonly used for trips made by higher-income riders. Finally, the percentage of Honored Citizen and college sticker fares increases as income decreases. Figure V-17 shows the analysis graphically.

## Fare Payment by Household Income

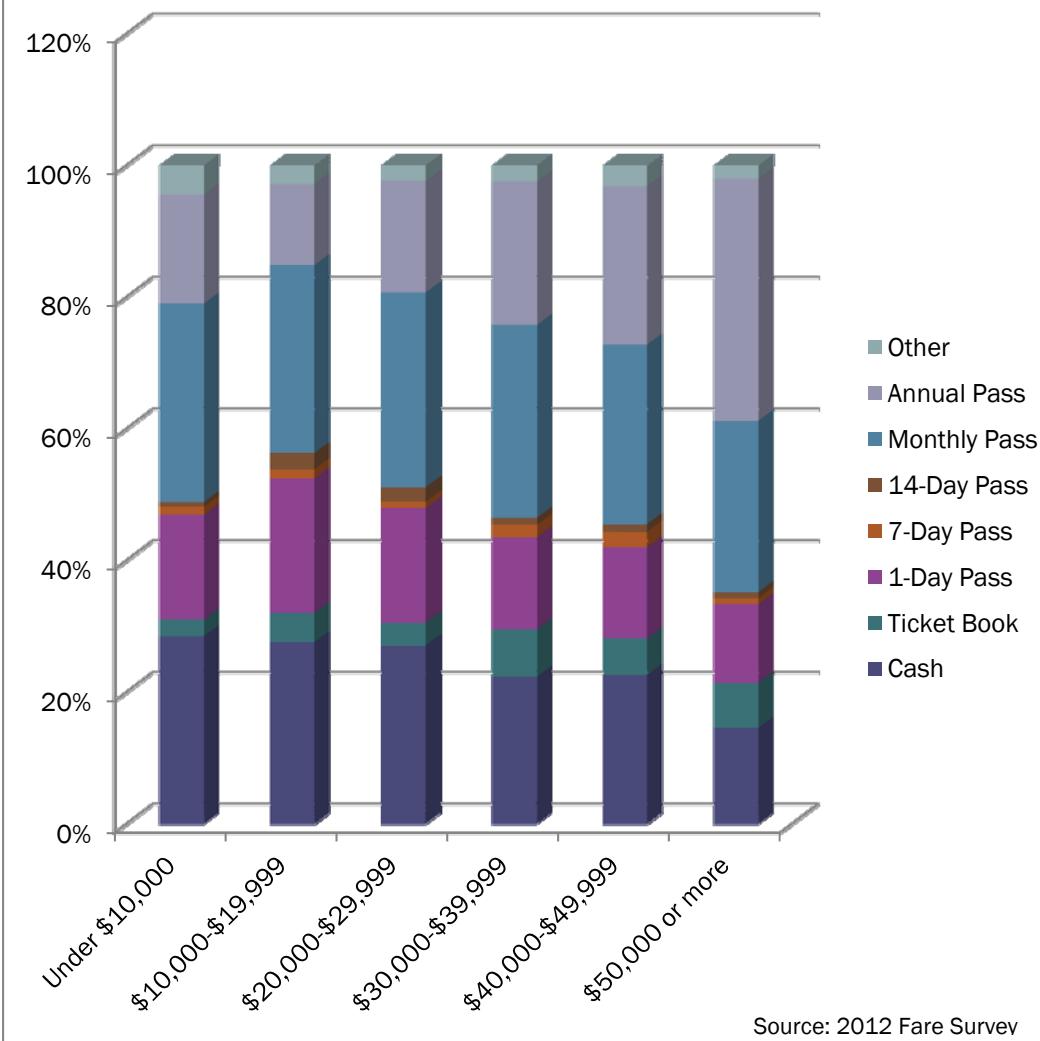


FIGURE V-17 FARE PAYMENT BY HOUSEHOLD INCOME

## FACILITIES

Three maps (Figures V-18, V-19, V-20) are provided to illustrate determination of Title VI program compliance with respect to recent, in progress, and planned major transit facilities. These respective figures highlight transit facilities that:

1. Were recently<sup>8</sup> replaced, improved<sup>9</sup>, or;
2. Have improvements are in progress, or;
3. Where improvements are scheduled (planned projects; projects identified in planning documents for an update in the next five years).

Figure V-18, Recent, In Progress, and Planned Facilities is organized by mode (bus or rail), and by facility type within mode. Scheduled improvements where mode has not yet been determined are identified as “improvement corridors.” All of the facilities meeting the “recently” and “in-progress” definitions were developed in full accordance with FTA policies in force at the time of their development including those applicable to Title VI analysis and compliance.

For example, the Portland to Milwaukie Light Rail Project (PMLR) was subject to NEPA analysis that resulted in public comment and publishing of a Final Environmental Impact Study (FEIS). (Note: A Title VI service and fare equity analysis for the PMLR startup service plan will be completed at least six months prior to the beginning of revenue operations in September 2015.)

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<sup>8</sup> Recently means since the prior Title VI program submittal (since Sept. 2010)

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

## Recent, In Progress, and Planned Facilities

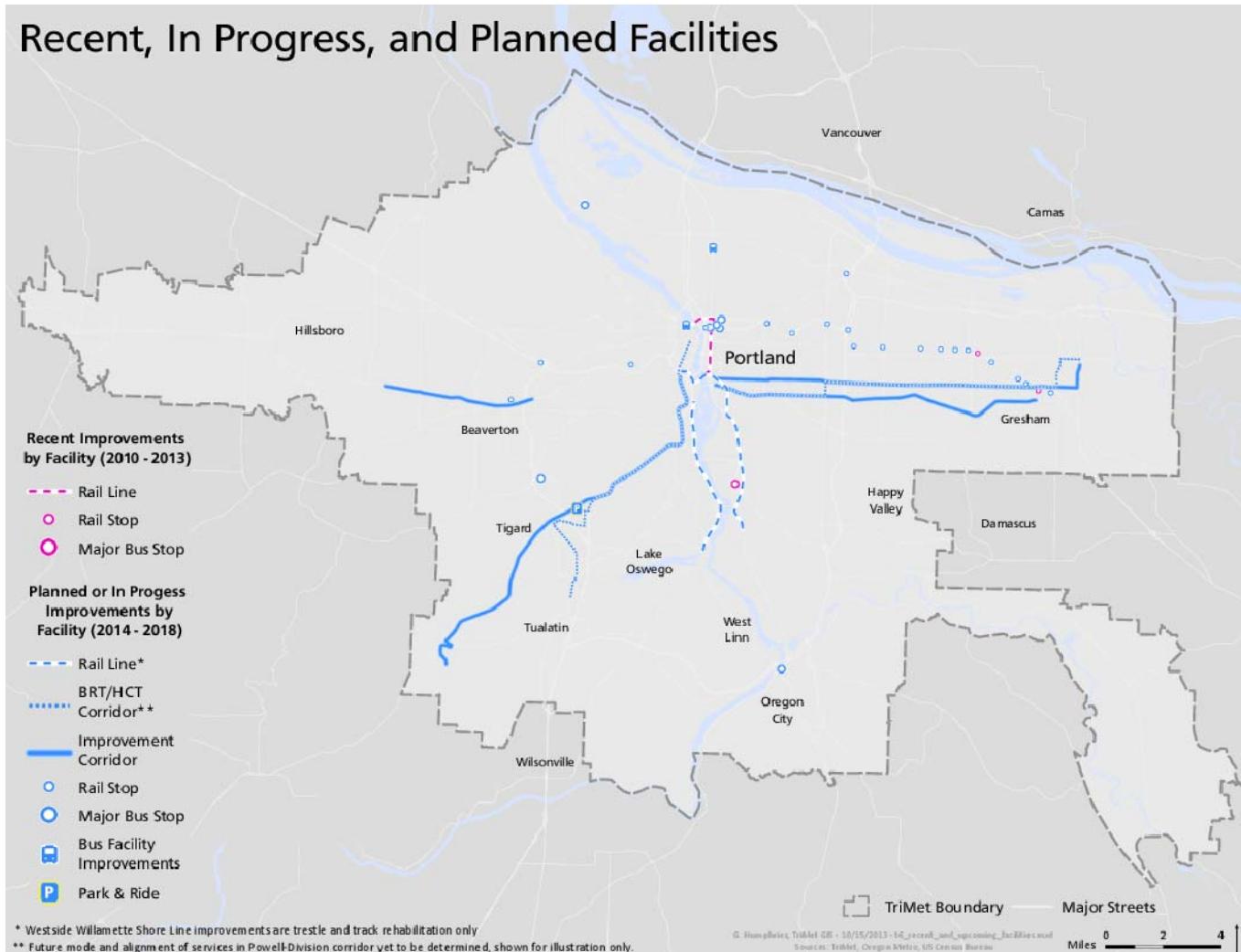


FIGURE V-18 RECENT, IN PROGRESS, AND PLANNED FACILITIES

## Recent, In Progress, and Planned Facilities with Minority Population

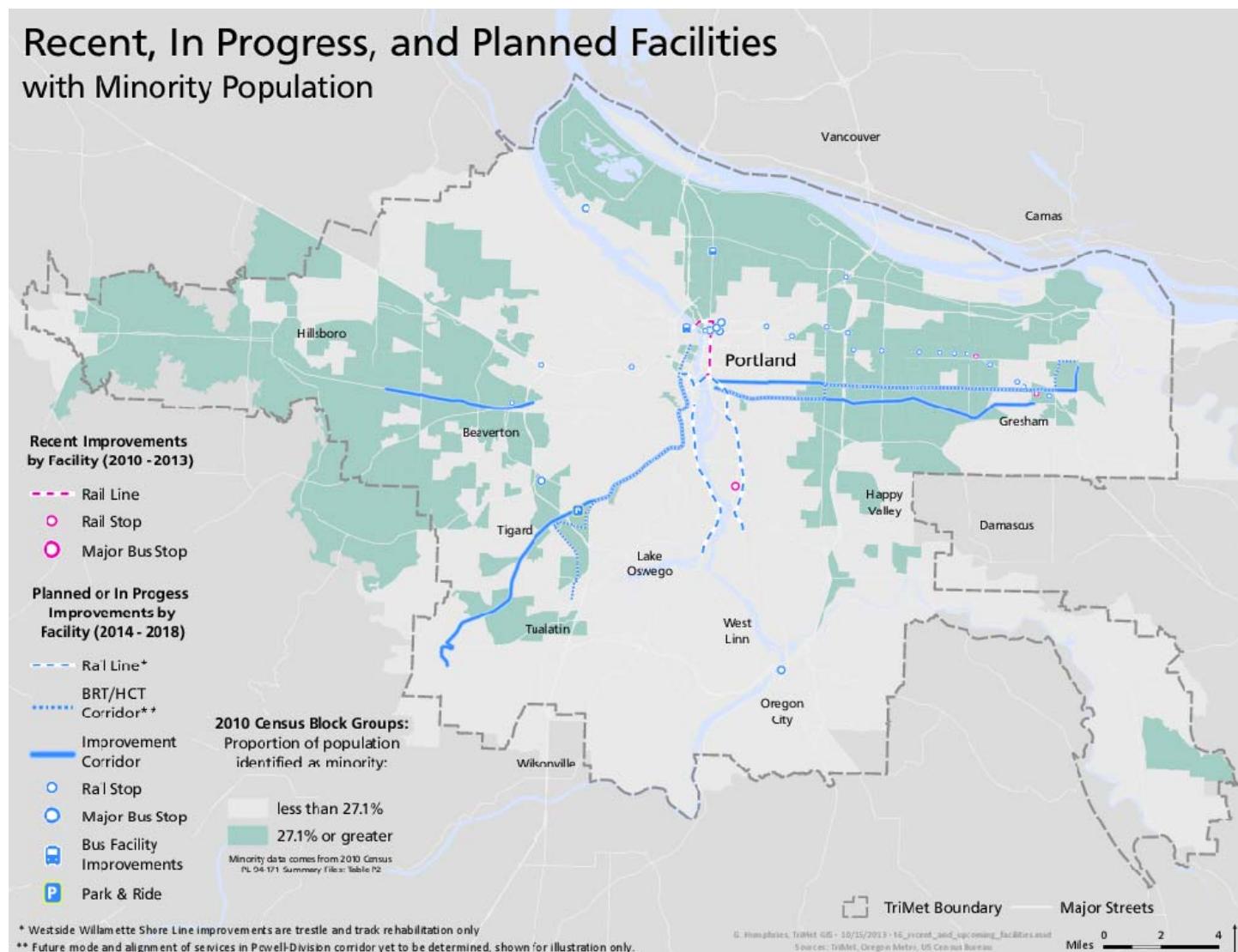


FIGURE V-19 RECENT, IN PROGRESS, AND PLANNED FACILITIES WITH MINORITY POPULATION

## Recent, In Progress, and Planned Facilities with Low-Income Population

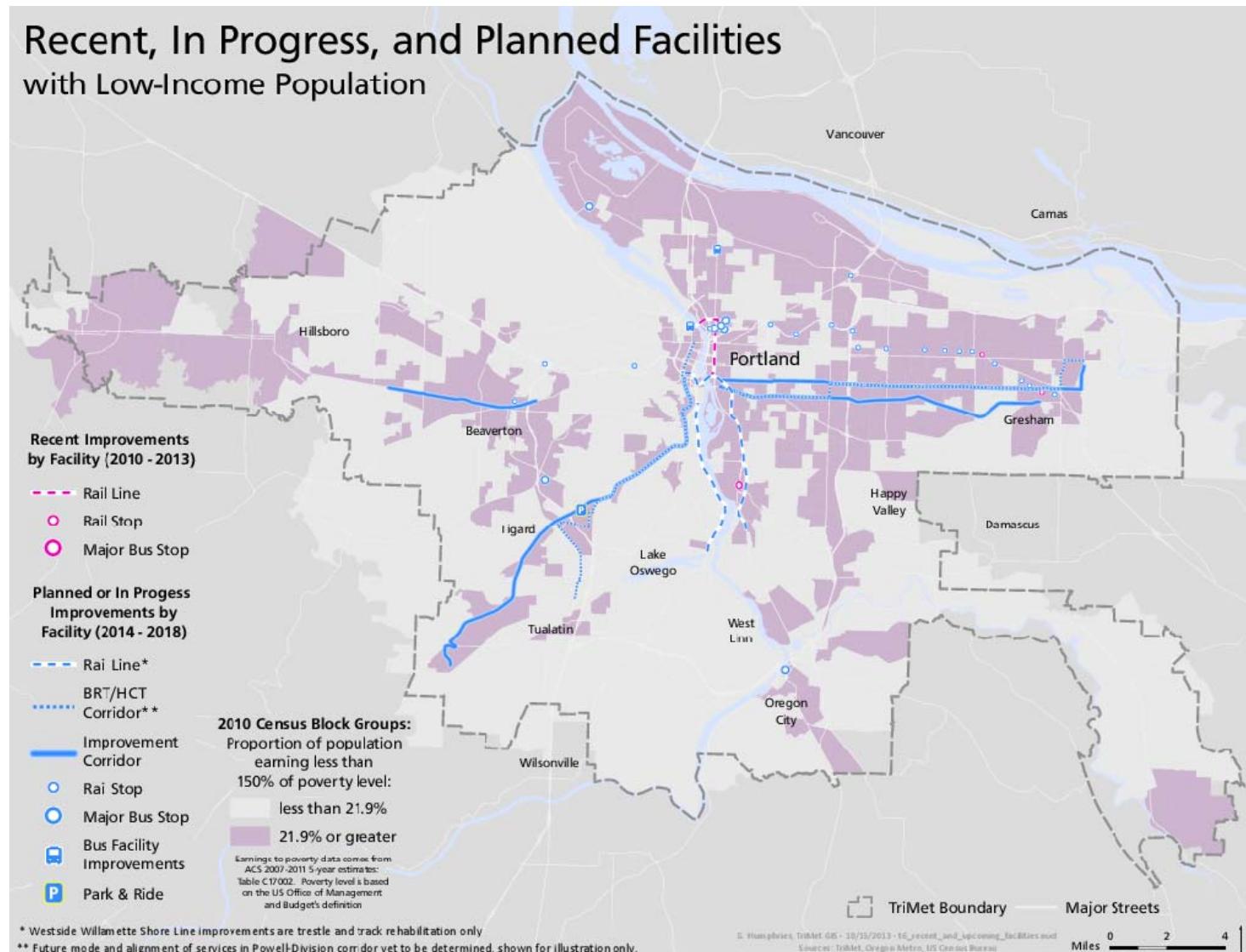


FIGURE V-20 RECENT, IN PROGRESS, AND PLANNED FACILITIES WITH LOW-INCOME POPULATION

Figure V-21 shows the location of existing facilities in relation to Frequent Service lines (all four light rail lines and 12 Frequent Service bus lines). Facilities are depicted by type; administrative, operations/maintenance, park & ride, and transit centers.

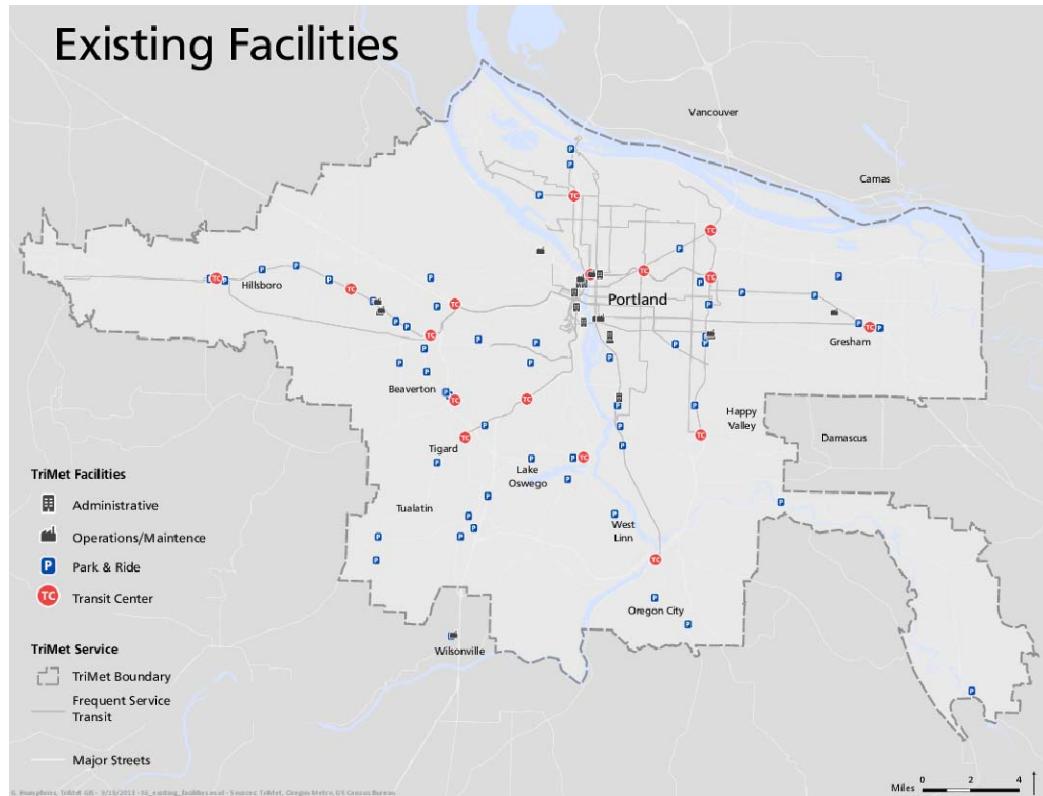


FIGURE V-21 EXISTING FACILITIES

Figure V-22 Existing Facilities with Minority Population shows the location of existing facilities and Frequent Service transit lines in relation to Census Block Groups with above average concentration of minority population (27.1 percent or greater). Facilities are depicted by type; administrative, operations/maintenance, park & ride, and transit centers. Administrative facilities are located in the center of the service district whereas bus and rail operations/maintenance facilities are distributed in central, Westside, and Eastside locations.

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

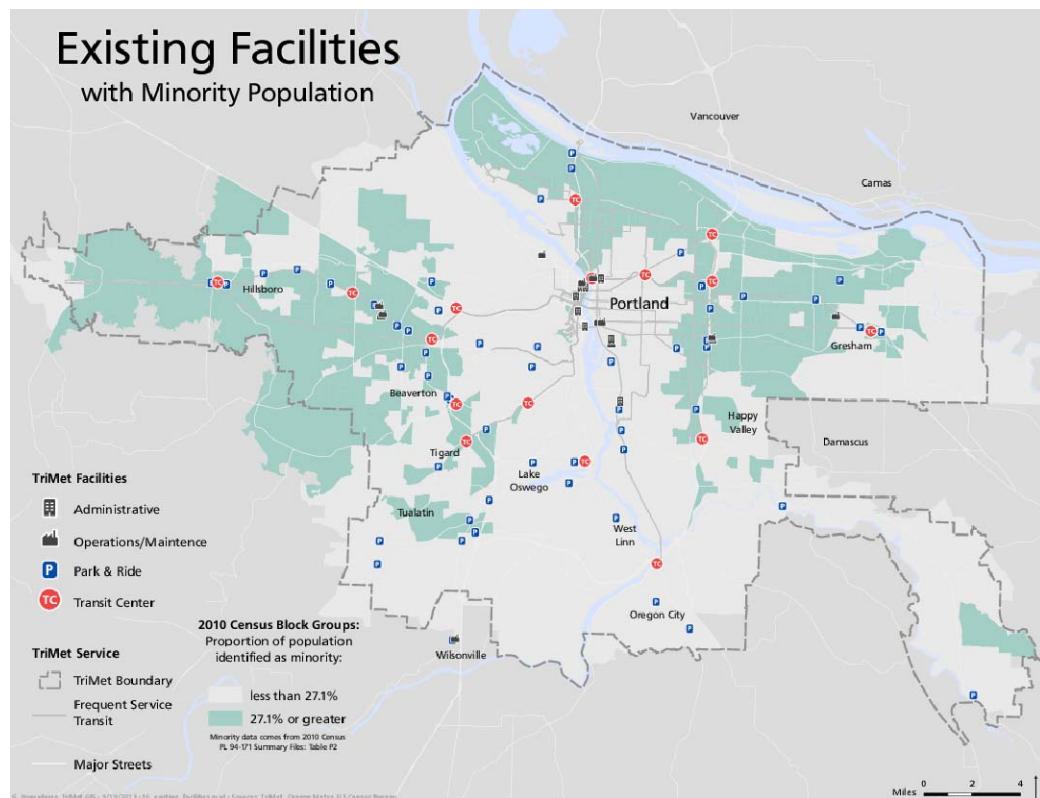


FIGURE V-22 EXISTING FACILITIES WITH MINORITY POPULATION

Figure V-23 Existing Facilities with Low-Income Population shows the location of existing facilities and Frequent Service transit lines in relation to Census Block Groups with above average concentration of low-income population (21.9% or greater). Facilities are depicted by type; administrative, operations/maintenance, park & ride, and transit centers. Administrative facilities are located in the center of the service district whereas bus and rail operations/maintenance facilities are distributed in central, Westside, and Eastside locations.

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

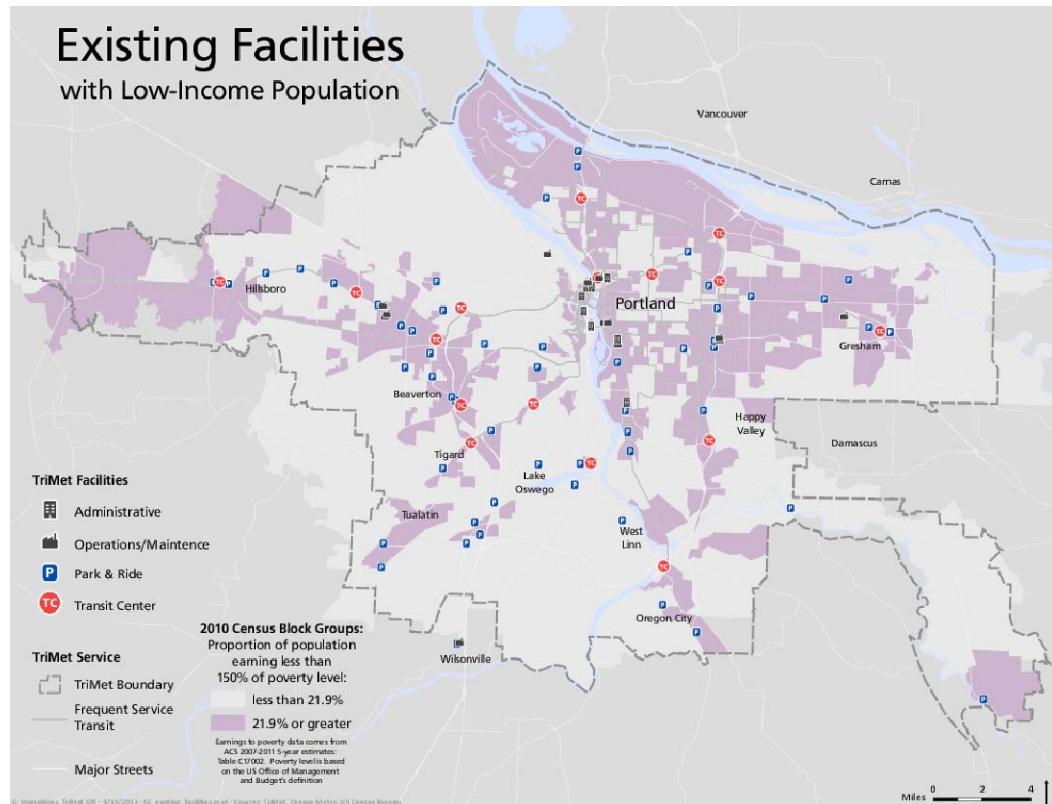


FIGURE V-23 EXISTING FACILITIES WITH LOW INCOME POPULATION

## AMENITIES

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

- Figure V-24 Amenity Distribution: Seating
- Figure V-25 Amenity Distribution: Digital Displays
- Figure V-26 Amenity Distribution: Elevators
- Figure V-27 Amenity Distribution: Shelters
- Figure V-28 Amenity Distribution: Signs, Maps, and/or Schedules
- Figure V-29 Amenity Distribution: Waste Receptacles

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

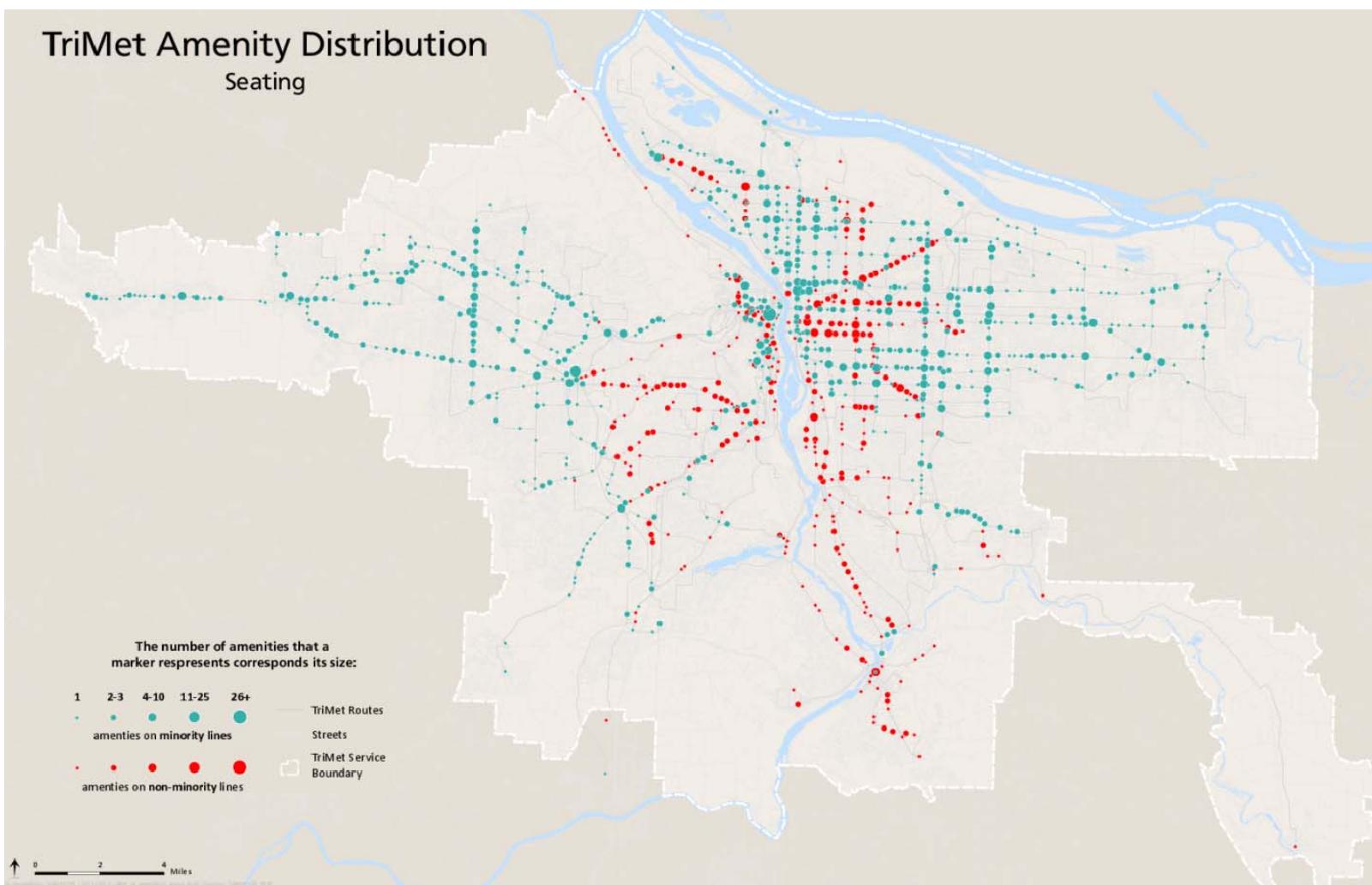


FIGURE V-24 AMENITY DISTRIBUTION: SEATING

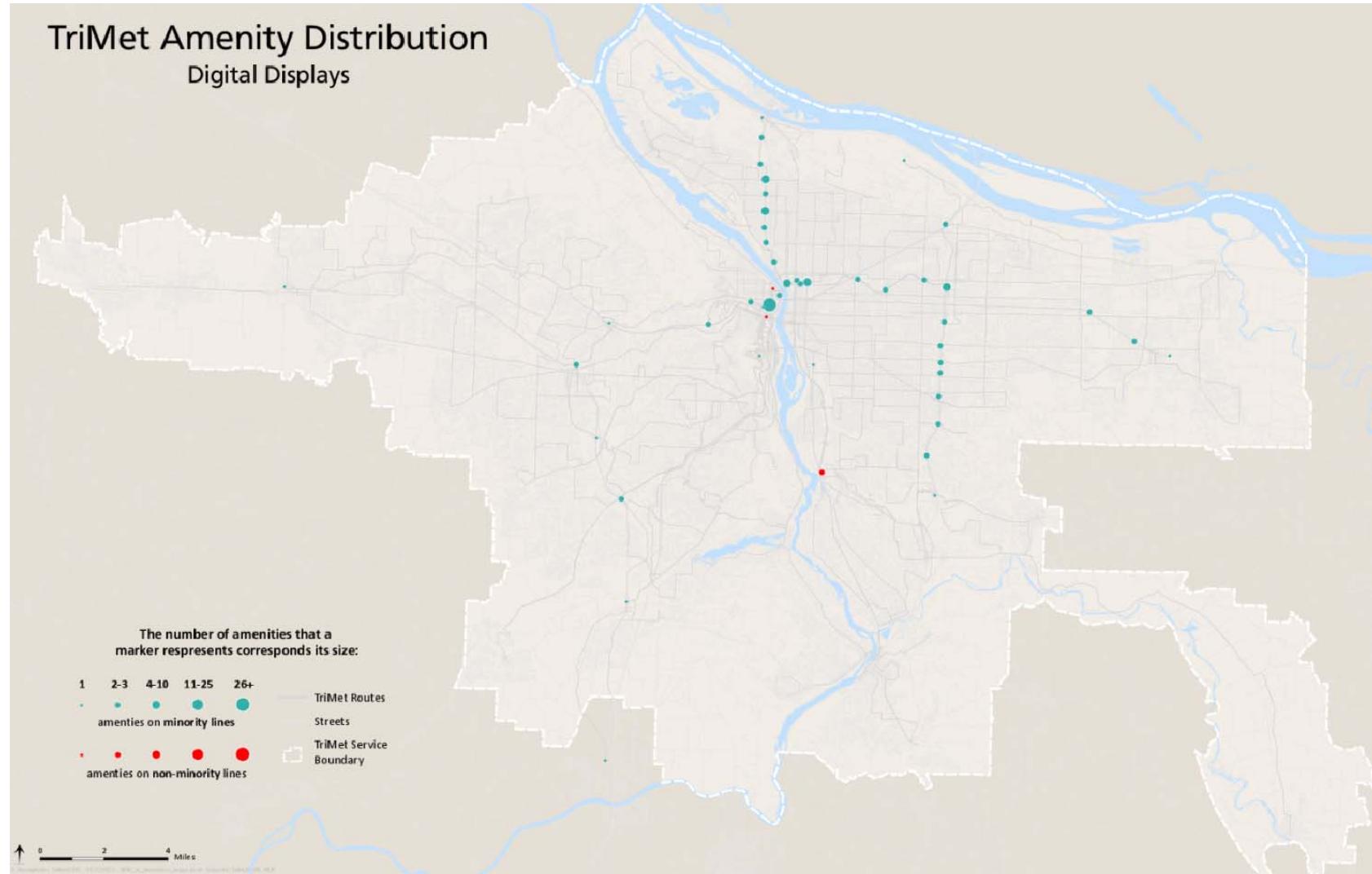


FIGURE V-25 AMENITY DISTRIBUTION: DIGITAL DISPLAYS

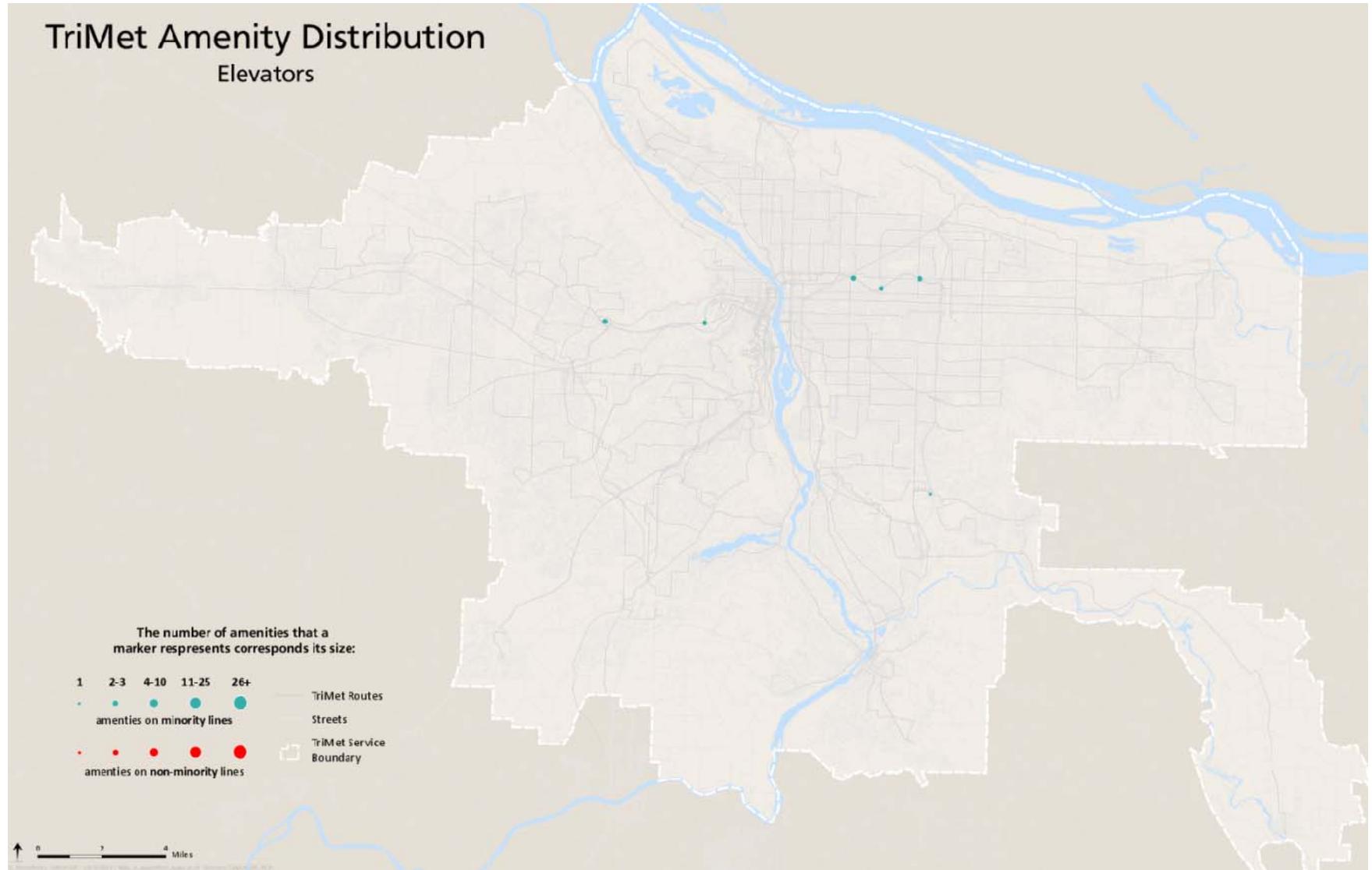


FIGURE V-26 AMENITY DISTRIBUTION: ELEVATORS

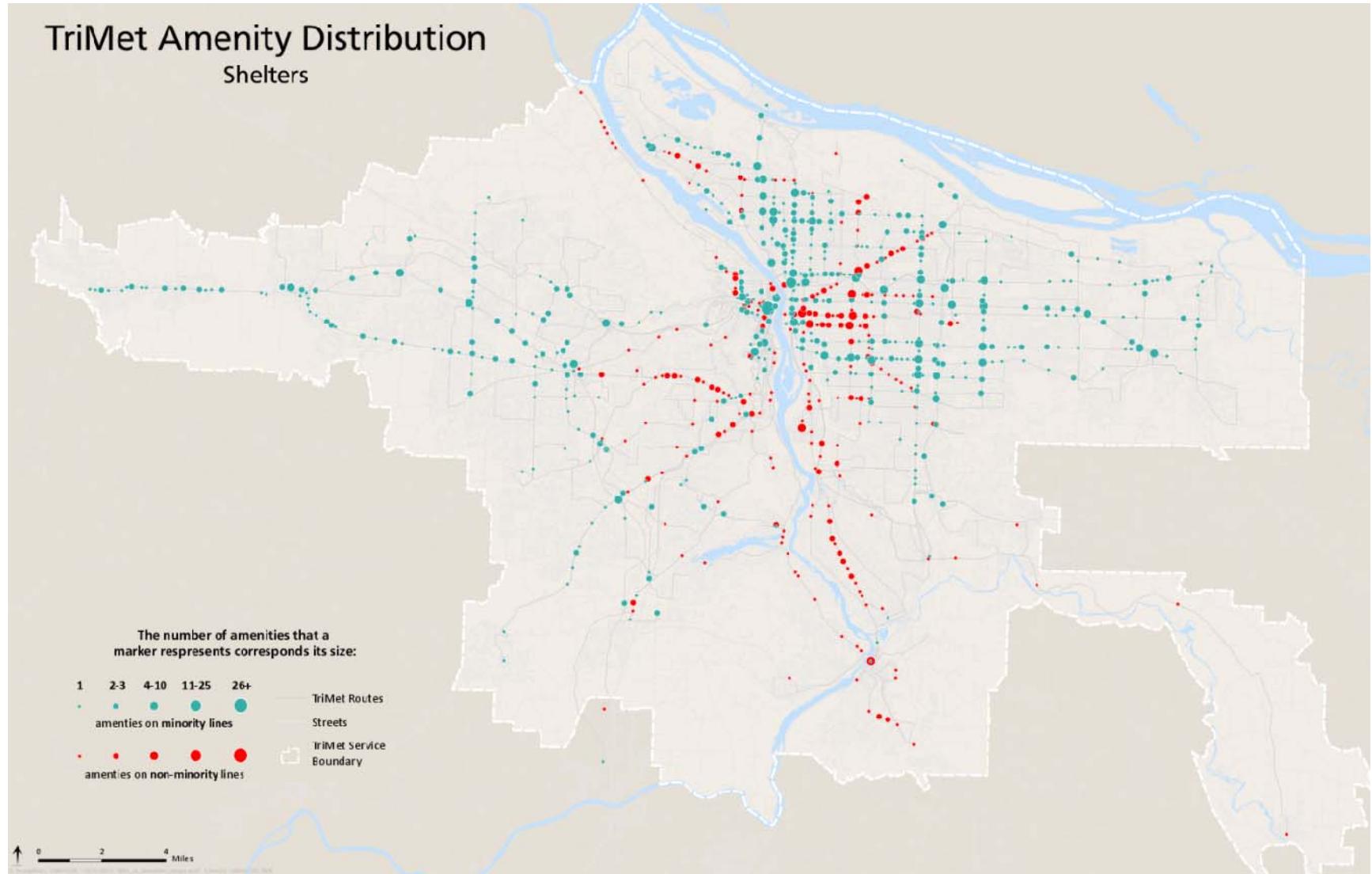


FIGURE V-27 AMENITY DISTRIBUTION: SHELTERS

## TriMet Amenity Distribution

Signs, Maps, and/or Schedules

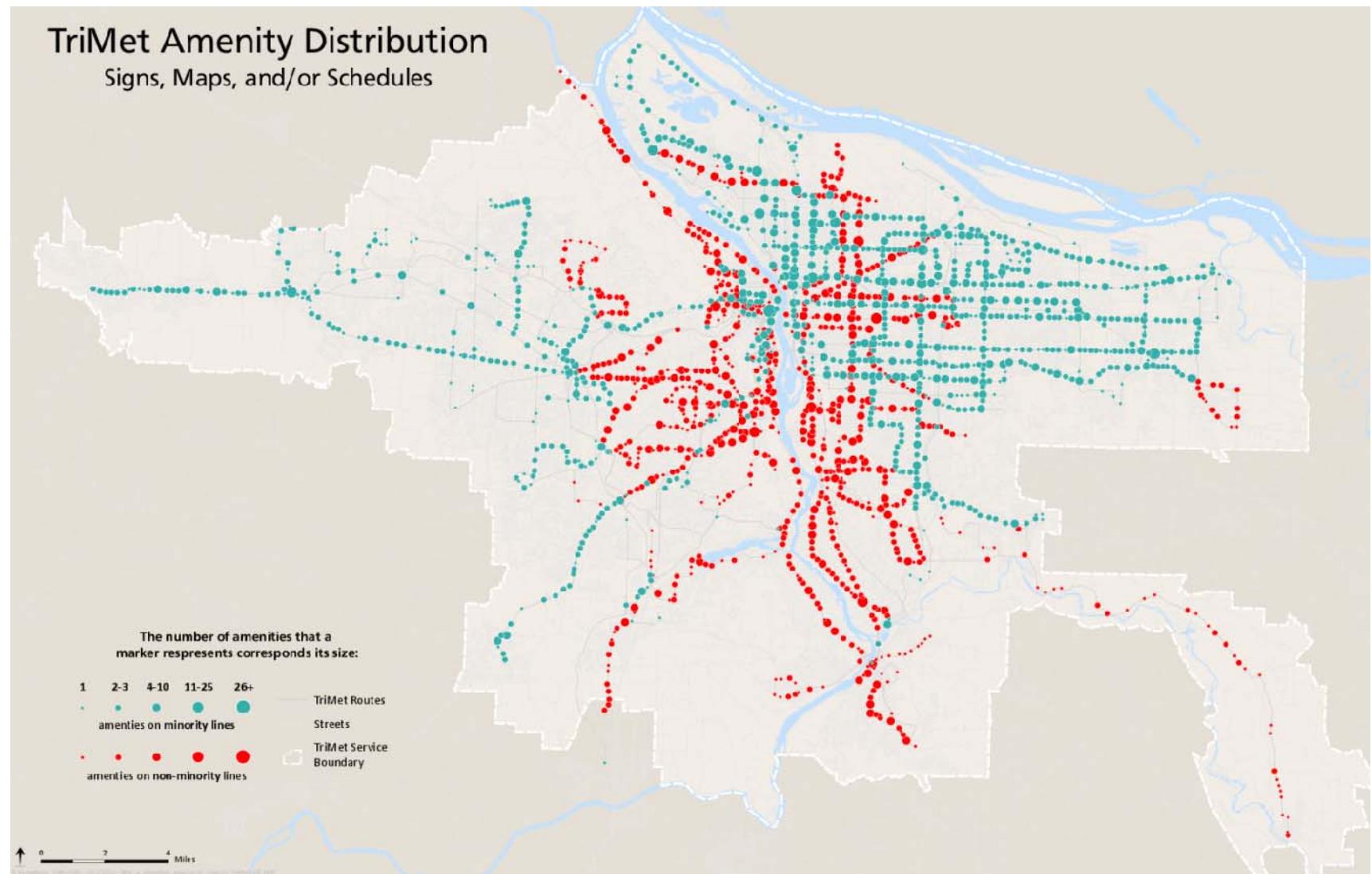


FIGURE V-28 AMENITY DISTRIBUTION: SIGNS, MAPS, AND/OR SCHEDULES

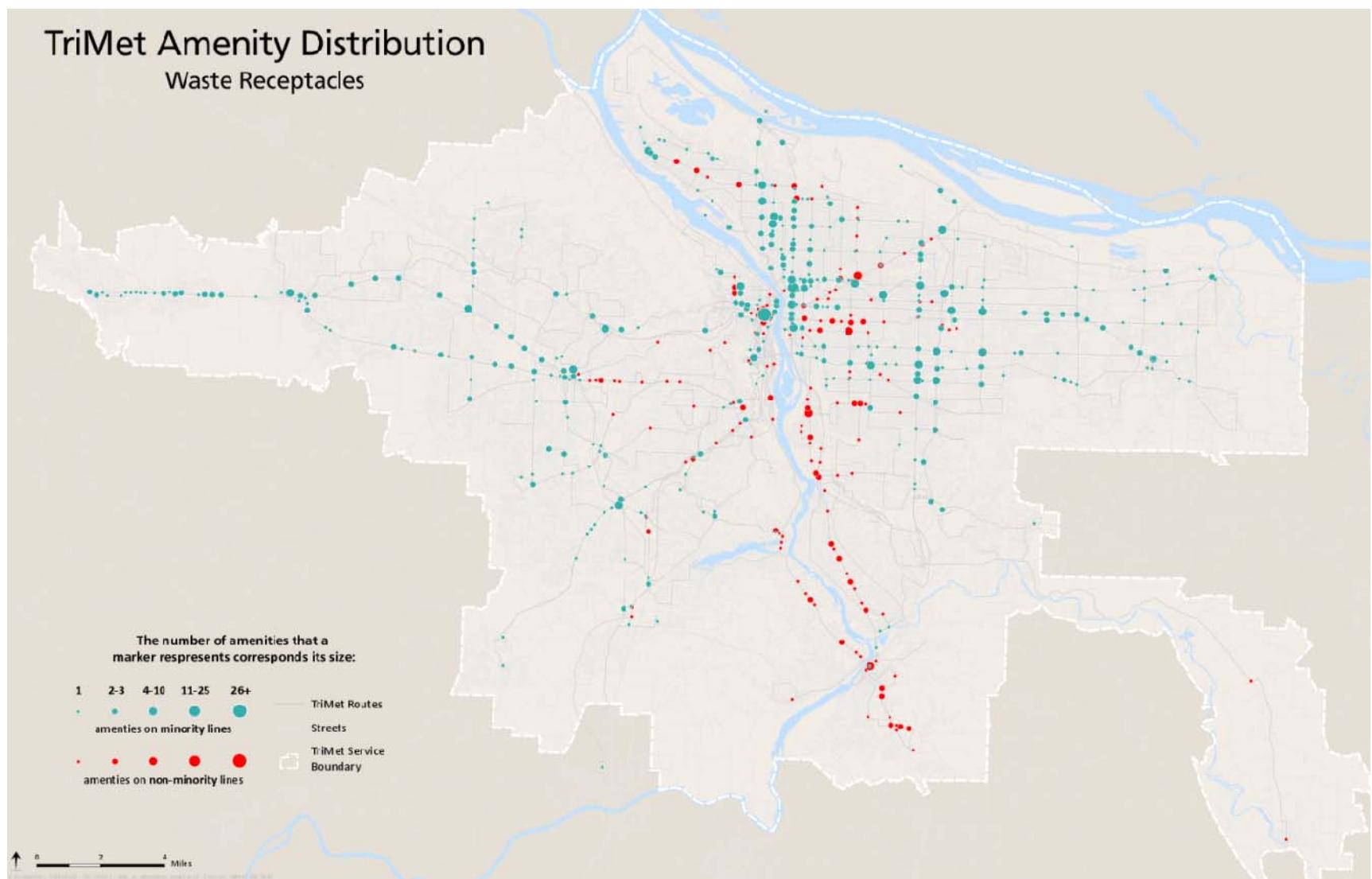


FIGURE V-29 AMENITY DISTRIBUTION: WASTE RECEPTACLES

# ATTACHMENTS

Attachment A: Board Resolution Approving Title VI Program and Related Service Standards and Policies

Attachment B: Complaint Form

Attachment C: Vehicle Notice

Attachment D: Annual Certifications and Assurances (2013, 2012, and 2011)

Attachment E: Public Engagement Framework

Attachment F: Language Assistance Plan

Attachment G: Updated Four Factor Analysis

Attachment H: LEP Example

Attachment I: Subrecipient Guide to Title VI Compliance

Attachment J: TriMet Title VI Transit Equity Impacts Assessment – Recommended Plan for Major Service and Fare Changes

Attachment K: TriMet Title VI Transit Equity Impacts Assessment – Recommended Service Changes Line 47-Baseline/Evergreen and 48-Cornell

Attachment L: Rider Demographic Profile

Attachment M: Trip Characteristics for Minority and Non-Minority Riders

Attachment N: Fare Payment by Household Income

Attachment O: Community Forum Comments

ATTACHMENT A: BOARD RESOLUTION APPROVING TITLE VI PROGRAM AND RELATED SERVICE STANDARDS AND POLICES

ATTACHMENT B: COMPLAINT FORM

**Tri-County Metropolitan Transportation District of Oregon  
(TriMet)**

4012 SE 17<sup>th</sup> Avenue  
Portland, OR 97202

503.962.2213  
TriMet.org

**TITLE VI COMPLAINT FORM\***

Title VI of the 1964 Civil Rights Act requires that "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 following information is necessary to assist us in processing your complaint. Should you require any assistance in completing this form or need information in alternative formats, please let us know.

Complete and return this form to TriMet, Director of Diversity and Transit Equity, 4012 SE 17<sup>th</sup> Avenue, Portland, OR 97202.

1. Complainant's Name: \_\_\_\_\_

2. Address: \_\_\_\_\_

3. City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

4. Telephone Number (home): \_\_\_\_\_ (business): \_\_\_\_\_  
Electronic Mail Address: \_\_\_\_\_

5. Are you filing this complaint on your own behalf? \_\_\_\_\_. If not, please supply the name and relationship of the person for whom you are complaining:  
\_\_\_\_\_  
Please explain why you have filed for a third party:  
\_\_\_\_\_

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party. \_\_\_\_\_

6. Which of the following best describes the reason you believe the discrimination took place? Was it because of your (check any box that applies):

- a. Race:
- b. Color:
- c. National Origin:

7. What date did the alleged discrimination take place? \_\_\_\_\_

8. In your own words, describe the alleged discrimination. Explain what happened and what policy, program, activity or person you believe was discriminatory.

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9. Have you filed this complaint with any other federal, state, or local agency, or with any federal or state court? Yes:  No:

If yes, check each box that applies:

Federal agency

Federal court

State agency

State court

Local agency

10. Please provide information about a contact person at the agency/court where the complaint was filed.

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

11. Please sign below. You may attach any written materials or other information that you think is relevant to your complaint.

---

Complainant's Signature

---

Date

# TriMet Respects Civil Rights

TriMet operates its programs without regard to race, color, national origin, religion, sex, sexual orientation, marital status, age or disability in accordance with applicable laws, including Title VI of the Civil Rights Act of 1964 and ORS Chapter 659A. To request additional information on TriMet's Title VI nondiscrimination requirements, or if any person believes they have been aggrieved by an unlawful discriminatory practice under Title VI or other applicable law and would like to file a complaint, contact us at 503-238-7433 (TTY 503-238-5811) or email [administration@trimet.org](mailto:administration@trimet.org).

TriMet tiến hành hoạt động các ban ngành của mình không phân biệt chủng tộc, màu da, nguồn gốc, tôn giáo, giới tính, khuynh hướng tình dục, tình trạng hôn nhân, tuổi tác hoặc khuyết tật sao cho phù hợp với pháp luật hiện hành, bao gồm Điều Khoản Thứ VI của Đạo Luật Dân Quyền Năm 1964 (Title VI of the Civil Rights Act of 1964) và Đạo Luật ORS Chapter 659A. Nếu quý vị cần thêm thông tin về các yêu cầu chống kỳ thị của TriMet dựa trên Điều Khoản Thứ VI, hoặc bắt cứ ai cho rằng họ đã bị phàn nàn vì những thủ tục kinh doanh bất hợp pháp như đã nêu trong Điều Khoản Thứ VI hoặc các điều luật khác của pháp luật hiện hành và muốn nộp đơn khiếu nại, xin liên lạc với chúng tôi tại số 503-238-7433 (số cho người khuyết tật 503-238-5811) hoặc gửi điện thư cho chúng tôi tại [administration@trimet.org](mailto:administration@trimet.org).

TriMet(트라이메트)의 모든 프로그램은 1964년 제정된 민권법 VI 편 및 ORS 659A를 포함한 관계 법령에 따라 인종, 피부색깔, 출신국, 종교, 성별, 성적성향, 혼인여부, 나이 또는 장애여부에 따른 차별없이 운영됩니다. TriMet (트라이메트)에서의 VI편 관련 차별 금지 규정에 관한 보다 자세한 자료가 필요하거나, VI편이나 기타 해당 법령에 따른 불법적 차별을 당하여 이의를 제기하고자 하는 분은 전화 503-238-7433 (TTY 503-238-5811)번 또는 전자우편 주소 [administration@trimet.org](mailto:administration@trimet.org)로 연락하여 주시기 바랍니다.

TriMet opera sus programas sin considerar raza, color, origen nacional, religión, sexo, orientación sexual, estado marital, edad o discapacidad de acuerdo con las leyes pertinentes incluyendo el Título VI del Acta de los Derechos Civiles de 1964, y ORS Capítulo 659A. Para más información sobre los requisitos no discriminatorios de TriMet bajo el Título VI, o si alguna persona piensa que fue agraviada por una práctica discriminatoria bajo el Título VI, y quiere presentar una queja contáctenos al 503-238-7433 (TTY 503-238-5811) o envíe un correo electrónico a [administration@trimet.org](mailto:administration@trimet.org).

Компания «TriMet» осуществляет свою деятельность без дискриминации по расовой принадлежности, цвету кожи, национальному происхождению, религии, полу, сексуальной ориентации, семейному статусу, возрасту, наличию инвалидности в соответствии со всеми применимыми законами, включая часть VI Акта о гражданских правах 1964 года и Главу 659A пересмотренных законов Орегона. Чтобы получить дополнительную информацию о недискриминации, или если кто-либо желает подать жалобу о незаконной дискриминации в соответствии с частью VI или любым другим применимым законом, пожалуйста, свяжитесь с нами по телефону 503-238-7433 (для слабослышащих – 503-238-5811) или напишите эл. письмо на адрес [administration@trimet.org](mailto:administration@trimet.org).

TriMet項目的運作按照適用法律不考慮種族、膚色、國籍、宗教、性別、性取向、婚姻狀況、年齡或殘疾狀況，其中包括1964年民權法案第VI章和ORS第659A章的規定。欲索取更多有關TriMet第VI章非歧視規定，或如果有任何人已經因為被非法歧視而感到屈辱而希望進行投訴，同時其符合第VI章或其它適用的法律，請聯繫我們503-238-7433 (聽力障礙 503-238-5811) 或發電子郵件至[administration@trimet.org](mailto:administration@trimet.org)。

## ATTACHMENT D: ANNUAL CERTIFICATIONS AND ASSURANCES (2013, 2012, AND 2011)

### FTA FISCAL YEAR 2013 CERTIFICATIONS AND ASSURANCES

#### FEDERAL FISCAL YEAR 2013 CERTIFICATIONS AND ASSURANCES FOR FEDERAL TRANSIT ADMINISTRATION ASSISTANCE PROGRAMS

(Signature page alternative to providing Certifications and Assurances in TMAP Web)

Name of Applicant: City of Greeley Mobility Solutions Incorporated (Type or Print Name)

The Applicant agrees to comply with applicable provisions of Groups 11 - 24. \_\_\_\_\_  
OR

The Applicant agrees to comply with applicable provisions of the Groups it has selected:

<u>Group</u>	<u>Description</u>	
01.	Required Certifications and Assurances for Each Applicant.	/
02.	Lobbying.	/
03.	Private Sector Protocols.	/
04.	Preclearance and Preemption System.	/
05.	Rolling Stock Review and Test Setup.	/
06.	Demand Response Services.	/
07.	Intelligent Transportation Systems.	/
08.	Interest and Finance Cap and Lending Costs.	/
09.	Transit Asset Management and Asset Safety Plans.	/
10.	Alcohol and Controlled Substances Testing.	/
11.	Fixed Guidance Capital Investment Program (New Starts, Small Starts, and Core Capacity) and Capital Investment Program in Effect before MAP 21.	/
12.	State of Good Repair Program.	/
13.	Fixed Guideline Modernization Grant Program.	/
14.	Bus/Bus Facilities Programs.	/
15.	Urbanized Area Formula Program and Job Access and Reverse Commute (JARC) Program.	/
16.	Senior and Elderly Individuals with Disabilities Protection and New Freedom Program.	/
17.	Rural and Other Non-Urbanized Areas/Appalachian Development/Over-the-Road Truck Accessibility Program.	/
18.	Public Transportation on Indian Reservations and Tribal Transit Programs.	N/A
19.	Low or No Emission/Clean Fuels Grant Programs.	/
20.	Paul S. Sarbanes Transit in Parks Program.	N/A
21.	State Safety Oversight Program.	/
22.	Public Transportation Emergency Relief Program.	/
23.	Expedited Project Delivery Pilot Program.	/
24.	Infrastructure Finance Programs.	N/A

## FTA FISCAL YEAR 2013 CERTIFICATIONS AND ASSURANCES

### **FEDERAL FISCAL YEAR 2013 FTA CERTIFICATIONS AND ASSURANCES SIGNATURE PAGE** (Required of all Applicants for FTA funding and all FTA Grantees with an active Capital or Formula Project)

#### AFFIRMATION OF APPLICANT

Name of Applicant: Tri-County Metropolitan Transportation District of Oregon  
Name and Relationship of Authorized Representative: Alison Langton, Finance Administrator

BY SIGNING BELOW, on behalf of the Applicant, I declare that the Applicant has duly authorized me to make these Certifications and Assurances and bind the Applicant's compliance. Thus, the Applicant agrees to comply with all Federal statutes and regulations, and follow applicable Federal guidance, and comply with the Certifications and Assurances as indicated on the foregoing page applicable to each application its authorized representative makes to the Federal Transit Administration (FTA) in Federal Fiscal Year 2013, irrespective of whether the individual that acted on its Applicant's behalf continues to represent the Applicant.

FTA intends that the Certifications and Assurances the Applicant selects on the other side of this document should apply, as provided, to each Project for which the Applicant seeks now, or may later seek FTA funding during Federal Fiscal Year 2013.

The Applicant affirms the truthfulness and accuracy of the Certifications and Assurances it has selected in the statements submitted with this document and any other submission made to FTA, and acknowledges that the Program Fraud Civil Remedies Act of 1986, 31 U.S.C. 3801 *et seq.*, and implementing U.S. DOT regulations, "Program Fraud Civil Remedies," 49 CFR part 31, apply to any certification, assurance or submission made to FTA. The criminal provisions of 18 U.S.C. 1001 apply to any certification, assurance, or submission made in connection with a Federal public transportation program authorized by 49 U.S.C. chapter 53 or any other statute

In signing this document, I declare under penalties of perjury that the foregoing Certifications and Assurances, and any other statements made by me on behalf of the Applicant are true and accurate.

Signature Alison Langton Date: 2/13/13  
Name Alison Langton  
Authorized Representative of Applicant

#### AFFIRMATION OF APPLICANT'S ATTORNEY

For (Name of Applicant): Tri-County Metropolitan Transportation District of Oregon

As the undersigned Attorney for the above named Applicant, I hereby affirm to the Applicant that it has authority under State, local, or tribal government law, as applicable, to make and comply with the Certifications and Assurances as indicated on the foregoing pages. I further affirm that, in my opinion, the Certifications and Assurances have been legally made and constitute legal and binding obligations on the Applicant.

I further affirm to the Applicant that, to the best of my knowledge, there is no legislation or litigation pending or imminent that might adversely affect the validity of these Certifications and Assurances, or of the performance of its FTA Project or Projects.

Signature Jana Toran Date: 2/13/13  
Name Jana Toran  
Attorney for Applicant

Each Applicant for FTA funding and each FTA Grantee with an active Capital or Formula Project must provide an Affirmation of Applicant's Attorney pertaining to the Applicant's legal capacity. The Applicant may enter its signature in lieu of the Attorney's signature, provided the Applicant has on file this Affirmation, signed by the attorney and dated this Federal fiscal year.

**FEDERAL FISCAL YEAR 2012 CERTIFICATIONS AND ASSURANCES FOR FEDERAL TRANSIT  
ADMINISTRATION ASSISTANCE PROGRAMS**

(Signature page alternative to providing Certifications and Assurances in TEAM-Web)

Name of Applicant: Tri-County Metropolitan Transportation District of Oregon

The Applicant agrees to comply with applicable provisions of Groups 01 – 24. \_\_\_\_\_  
OR

The Applicant agrees to comply with applicable provisions of the Groups it has selected:

<u>Group</u>	<u>Description</u>	
01.	Assurances Required For Each Applicant.	✓
02.	Lobbying.	✓
03.	Procurement Compliance.	✓
04.	Protections for Private Providers of Public Transportation.	✓
05.	Public Hearing.	✓
06.	Acquisition of Rolling Stock for Use in Revenue Service.	✓
07.	Acquisition of Capital Assets by Lease.	✓
08.	Bus Testing.	✓
09.	Charter Service Agreement.	✓
10.	School Transportation Agreement.	✓
11.	Demand Responsive Service.	✓
12.	Alcohol Misuse and Prohibited Drug Use.	✓
13.	Interest and Other Financing Costs.	✓
14.	Intelligent Transportation Systems.	✓
15.	Urbanized Area Formula Program.	✓
16.	Clean Fuels Grant Program.	✓
17.	Elderly Individuals and Individuals with Disabilities Formula Program and Pilot Program.	✓
18.	Nonurbanized Area Formula Program for States.	N/A
19.	Job Access and Reverse Commute (JARC) Program.	✓
20.	New Freedom Program.	✓
21.	Paul S. Sarbanes Transit in Parks Program.	N/A
22.	Tribal Transit Program.	N/A
23.	TIFIA Projects	N/A
24.	Deposits of Federal Financial Funding to a State Infrastructure Banks.	N/A

**FEDERAL FISCAL YEAR 2012 FTA CERTIFICATIONS AND ASSURANCES SIGNATURE PAGE**  
*(Required of all Applicants for FTA funding and all FTA Grantees with an active capital or formula project)*

AFFIRMATION OF APPLICANT

Name of Applicant: Tri-County Metropolitan Transportation District of Oregon

Name and Relationship of Authorized Representative: Neil McFarlane, General Manager

BY SIGNING BELOW, on behalf of the Applicant, I declare that the Applicant has duly authorized me to make these certifications and assurances and bind the Applicant's compliance. Thus, the Applicant agrees to comply with all Federal statutes and regulations, and follow applicable Federal directives, and comply with the certifications and assurances as indicated on the foregoing page applicable to each application it makes to the Federal Transit Administration (FTA) in Federal Fiscal Year 2012.

FTA intends that the certifications and assurances the Applicant selects on the other side of this document, as representative of the certifications and assurances, should apply, as provided, to each project for which the Applicant seeks now, or may later seek FTA funding during Federal Fiscal Year 2012.

The Applicant affirms the truthfulness and accuracy of the certifications and assurances it has made in the statements submitted with this document and any other submission made to FTA, and acknowledges that the Program Fraud Civil Remedies Act of 1986, 31 U.S.C. 3801 *et seq.*, and implementing U.S. DOT regulations, "Program Fraud Civil Remedies," 49 CFR part 31 apply to any certification, assurance or submission made to FTA. The criminal provisions of 18 U.S.C. 1001 apply to any certification, assurance, or submission made in connection with a Federal public transportation program authorized in 49 U.S.C. chapter 53 or any other statute

In signing this document, I declare under penalties of perjury that the foregoing certifications and assurances, and any other statements made by me on behalf of the Applicant are true and accurate.

Signature Neil McFarlane Date: 11/04/2011

Name Neil McFarlane

Authorized Representative of Applicant

AFFIRMATION OF APPLICANT'S ATTORNEY

For (Name of Applicant): Tri-County Metropolitan Transportation District of Oregon

As the undersigned Attorney for the above named Applicant, I hereby affirm to the Applicant that it has authority under State, local, or tribal government law, as applicable, to make and comply with the certifications and assurances as indicated on the foregoing pages. I further affirm that, in my opinion, the certifications and assurances have been legally made and constitute legal and binding obligations on the Applicant.

I further affirm to the Applicant that, to the best of my knowledge, there is no legislation or litigation pending or imminent that might adversely affect the validity of these certifications and assurances, or of the performance of the project.

Signature J. Tava Tovar

Date: 11/4/01

Name J. Tava Tovar

**Attorney for Applicant**

Each Applicant for FTA funding and each FTA Grantee with an active capital or formula project must provide an Affirmation of Applicant's Attorney pertaining to the Applicant's legal capacity. The Applicant may enter its signature in lieu of the Attorney's signature, provided the Applicant has on file this Affirmation, signed by the attorney and dated this Federal fiscal year.

## APPENDIX A

**FEDERAL FISCAL YEAR 2011 FTA CERTIFICATIONS AND ASSURANCES SIGNATURE PAGE**  
(Required of all Applicants for FTA assistance and all FTA Grantees with an active capital or formula project)**AFFIRMATION OF APPLICANT**Name of Applicant: Tri-County Metropolitan Transportation District Of OregonName and Relationship of Authorized Representative: Neil McFarlane, General Manager

BY SIGNING BELOW, on behalf of the Applicant, I declare that the Applicant has duly authorized me to make these certifications and assurances and bind the Applicant's compliance. Thus, the Applicant agrees to comply with all Federal statutes and regulations, and follow applicable Federal directives, and comply with the certifications and assurances as indicated on the foregoing page applicable to each application it makes to the Federal Transit Administration (FTA) in Federal Fiscal Year 2011.

FTA intends that the certifications and assurances the Applicant selects on the other side of this document, as representative of the certifications and assurances in this document, should apply, as provided, to each project for which the Applicant seeks now, or may later, seek FTA assistance during Federal Fiscal Year 2011.

The Applicant affirms the truthfulness and accuracy of the certifications and assurances it has made in the statements submitted herein with this document and any other submission made to FTA, and acknowledges that the Program Fraud Civil Remedies Act of 1986, 31 U.S.C. 3801 *et seq.*, and implementing U.S. DOT regulations, "Program Fraud Civil Remedies," 49 CFR part 31 apply to any certification, assurance or submission made to FTA. The criminal provisions of 18 U.S.C. 1001 apply to any certification, assurance, or submission made in connection with a Federal public transportation program authorized in 49 U.S.C. chapter 53 or any other statute.

In signing this document, I declare under penalties of perjury that the foregoing certifications and assurances, and any other statements made by me on behalf of the Applicant are true and correct.

Signature Neil McFarlane Date: 11/8/10Name Neil McFarlane  
Authorized Representative of Applicant**AFFIRMATION OF APPLICANT'S ATTORNEY**For (Name of Applicant): Tri-County Metropolitan Transportation District Of Oregon

As the undersigned Attorney for the above named Applicant, I hereby affirm to the Applicant that it has authority under State, local, or tribal government law, as applicable, to make and comply with the certifications and assurances as indicated on the foregoing pages. I further affirm that, in my opinion, the certifications and assurances have been legally made and constitute legal and binding obligations on the Applicant.

I further affirm to the Applicant that, to the best of my knowledge, there is no legislation or litigation pending or imminent that might adversely affect the validity of these certifications and assurances, or of the performance of the project.

Signature M. Brian Playfair Date: 11/8/10Name M. Brian Playfair  
Attorney for Applicant

Each Applicant for FTA financial assistance and each FTA Grantee with an active capital or formula project must provide an Affirmation of Applicant's Attorney pertaining to the Applicant's legal capacity. The Applicant may enter its signature in lieu of the Attorney's signature, provided the Applicant has on file this Affirmation, signed by the attorney and dated this Federal fiscal year.

## APPENDIX A

**FEDERAL FISCAL YEAR 2011 CERTIFICATIONS AND ASSURANCES FOR  
FEDERAL TRANSIT ADMINISTRATION ASSISTANCE PROGRAMS***(Signature page alternative to providing Certifications and Assurances in TEAM-Web)***Name of Applicant:** Tri-County Metropolitan Transportation District of Oregon**The Applicant agrees to comply with applicable provisions of Categories 01 – 24.** \_\_\_\_\_**OR****The Applicant agrees to comply with applicable provisions of the Categories it has selected:**

<u>Category</u>	<u>Description</u>	
01.	Assurances Required For Each Applicant.	X
02.	Lobbying.	X
03.	Procurement Compliance.	X
04.	Protections for Private Providers of Public Transportation.	X
05.	Public Hearing.	X
06.	Acquisition of Rolling Stock for Use in Revenue Service.	X
07.	Acquisition of Capital Assets by Lease.	X
08.	Bus Testing.	X
09.	Charter Service Agreement.	X
10.	School Transportation Agreement.	X
11.	Demand Responsive Service.	X
12.	Alcohol Misuse and Prohibited Drug Use.	X
13.	Interest and Other Financing Costs.	X
14.	Intelligent Transportation Systems.	X
15.	Urbanized Area Formula Program.	X
16.	Clean Fuels Grant Program.	X
17.	Elderly Individuals and Individuals with Disabilities Formula Program and Pilot Program.	X
18.	Nonurbanized Area Formula Program for States.	N/A
19.	Job Access and Reverse Commute Program.	X
20.	New Freedom Program.	X
21.	Paul S. Sarbanes Transit in Parks Program.	N/A
22.	Tribal Transit Program.	N/A
23.	TIFIA Projects	N/A
24.	Deposits of Federal Financial Assistance to a State Infrastructure Banks.	N/A

## ATTACHMENT E: PUBLIC ENGAGEMENT FRAMEWORK

### **INCLUSIVE PUBLIC PARTICIPATION**

---

TriMet established a comprehensive public involvement processes to ensure minority, low-income and limited English proficient (LEP) populations are included in TriMet's public outreach and involvement activities. TriMet's Diversity and Transit Equity Department serves as an agency resource to other TriMet divisions to integrate these populations into TriMet's public involvement activities. This plan was last updated in September 2012.

In proposing any service changes, particularly changes that may result in diminished service, TriMet uses a variety of methods to communicate proposed changes and solicit feedback from the community. TriMet also engages in extensive community outreach in conjunction with large-scale projects to ensure that affected residences and businesses are fully apprised of the impacts and benefits and are provided an opportunity for input in planning and implementation. On routes where there are a significant number of limited English proficient riders, TriMet staff will translate materials to ensure those riders can participate. After receiving public input, TriMet will determine whether to continue a service in its current form, change the service, or eliminate the service. Special attention is paid to the identification of any transit-dependent persons potentially affected by a route or service change.

### **DEPARTMENT OF DIVERSITY & TRANSIT EQUITY**

---

TriMet's Diversity & Transit Equity department plays an integral role in increasing TriMet's involvement and outreach to low-income and communities of color. During the FY13 budget process, the Department led outreach efforts to garner the input of minority and low-income populations in the process which included:

- Proactive Community Budget Forums targeted at Transit Dependent Populations (see, <http://pgpride.org/trimet-irco-community-budget-forum>) co-hosted with a Community Based Organization (CBO), IRCO (Immigrant and Refugee Community Organization), which serves immigrant, refugee and minority communities.
- Convening roundtable discussions with Leaders of Color (see "roundtable doc." attachment).
- Planning meetings between CBOs who represent low-income and communities of color and TriMet's General Manager.
- Presenting to TriMet's Board of Directors on Transit Equity, Environmental Justice and Transit Equity (see *Title VI & Board Presentation docs*).

The Department will continue to play an instrumental role in helping to achieve TriMet's outreach goals to Low-income and Communities of Color. One such effort is the creation of a Transit Equity Advisory Group. Consisting of members representing a cross-section of minority, socioeconomic, geographic and community interests, the Advisory group will advise the TriMet Board, General Manager and TriMet management on issues pertaining to diversity and transit equity and will act as a sounding board on policies. The group will also help TriMet reach underserved communities by reaching out to their respective organizations. The advisory group will represent organizations serving the communities/interest of:

- African American
- Latino
- Immigrant
- Transit-Dependent
- Social Service Providers

## **CAPITAL INVESTMENT DECISION-MAKING**

---

TriMet will continue to identify ways to involve low-income populations and communities of color in capital investment decision-making. Building on TriMet's existing outreach (see *Tip outreach, 2011 doc.*), the agency will identify opportunities to consult low-income populations and communities of color when developing major capital investment priorities. Over the next several months, TriMet will enhance policies to increase public participation opportunities pursuant to FTA's Environmental Justice and Title VI new guidance which calls for more proactive community involvement of underserved communities. Additionally, major capital investment recommendations will be brought before the Transit Equity Advisory Group for their input and outreach.

ATTACHMENT F: LANGUAGE ASSISTANCE PLAN



## **Limited English Proficient (LEP)**

### **LEP Access Plan and Implementation Schedule**

**December 1, 2010**

**TriCounty Metropolitan Transportation District  
of Oregon**

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<b>FIGURE 2: LEP POPULATION CLUSTERS AND TRIMET SERVICE .....</b>	<b>9</b>

## I. MESSAGE FROM THE GENERAL MANAGER

TriMet's approach to serving our Limited English Proficient (LEP) communities aligns with the agency's mission to make life better for the public by creating the ideal customer experience with service that represents our shared values to be responsive, act inclusively, solve problems creatively and do the right thing.

As a public transit agency, TriMet serves a broad and diverse community. Providing practical access to information for our programs and services, for all of our customers, is a priority for TriMet. It is our intent to make our system as accessible and easy to use as possible. To accomplish this, we expect to deliver on our commitment to serve our community with service that is safe, dependable, responsive, easy, and inviting. That is the TriMet way.

TriMet is committed to taking reasonable steps to provide meaningful access to vital information and services for LEP stakeholders who use our services, facilities and programs, and who attend our meetings and events.

A handwritten signature in black ink that reads "Neil McFarlane". The signature is fluid and cursive, with a slightly larger "N" at the beginning.

Neil McFarlane  
General Manager, TriMet

## **II. EXECUTIVE SUMMARY**

On December 14, 2005, the United States Department of Transportation (DOT) published revised guidance for its recipients on the Implementation of Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency." The Census definition of a Limited English Proficient (LEP) person is "...a person who speaks another language other than English at home and does not speak English well or not at all."

As a public transit agency, the Tri-County Metropolitan Transportation District of Oregon (TriMet) serves a broad and diverse community. Providing simple access to information about our programs and services, for all of our customers, has long been a priority for the agency. TriMet supports the goals of the DOT LEP Guidance and is committed to taking reasonable steps to provide meaningful access to LEP stakeholders who use our services, facilities, and programs, and who attend our meetings and events.

TriMet is committed to complying with the requirements of Title VI, Executive Order 13166, and DOT LEP Implementing Guidance. To prepare a useful LEP Access Plan, TriMet conducted a LEP needs assessment as identified in Executive Order 13166. Key elements of the resulting LEP Access Plan are as follows:

### **1. LEP Population Identification**

Analysis of 2000 U.S. Census data showed that LEP populations represent 3.89 percent of the total TriMet service district. Of the LEP populations, the largest group is the Spanish-speakers (65%), followed distantly by Vietnamese (11%), Russian (9%), Chinese (6%), and Korean (4%).

Analysis also showed that most of the urban LEP populations located themselves along well-served transit corridors. Comparatively, Spanish-speakers were more widely dispersed than the other language groups – forming both urban and semi-rural communities.

### **2. LEP Activities**

After an extensive review of the LEP populations and their needs, a two- tiered approach to meeting the needs of LEP populations in the TriMet district was envisioned.

#### ***Tier One: Successful Activities to Continue***

Tier One retained existing programs and activities designed to meet the language needs of regional LEP populations such as: telephone interpreters in virtually any language; multilingual printed materials and multilingual information on the TriMet web site; and continuing development of partnerships with community organizations that serve LEP populations.

### **Tier Two: New Areas of Focus**

Tier Two identified new areas of focus to further the agency's goal of providing LEP customers with *meaningful access* to TriMet programs and services. The new activities focus on seven primary areas:

1. **Language Assistance:** Provide free language assistance for non-vital yet important outreach documents and in-person interpreter services for events where public testimony is solicited.
2. **Vital Documents:** Determine which documents are **vital** for translation, and choose the format(s) to most effectively communicate the messages contained in those documents.
3. **Training:** Train all front line and all other staff to effectively engage and respond to LEP customers.
4. **Definitions and Standards:** Develop a method to ensure consistency in the application of competency standards for interpreters and translators.
5. **Customer Information:** Provide timely, relevant information about TriMet programs and services to the LEP communities in the key LEP languages.
6. **Outreach:** Conduct culturally-competent outreach to LEP communities to increase awareness and use of TriMet services and programs.
7. **Research and Administration:** Develop a means to assess and monitor the effectiveness of TriMet's LEP Plan internally and externally on two levels:
  - a. Ongoing review to immediately address any critical issues and make changes to the LEP Access Plan as needed.
  - b. Annual review to include any changes in demographics, types of services, or other LEP community needs.

As a result of the LEP needs assessment, the agency instituted the *LEP Access Plan* dedicated to mitigating language barriers that could prevent LEP customers from accessing agency programs and services. Because of the large size and dispersed nature of the Spanish-speaking LEP population, they were chosen as a test case for developing a culturally-appropriate outreach program.

The program is housed in the Marketing Division with the Director of Marketing responsible for the overall program. Additional funding was secured to hire a LEP Outreach Coordinator to help develop the program and carry out the day-to-day tasks.

### **III. BACKGROUND**

#### **Legal Basis for Language Assistance Requirements**

LEP legislation comes directly out of the civil rights movement:

1. Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), interpreted Title VI regulations promulgated by the former Department of Health, Education, and Welfare to hold that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination.
2. Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency” Reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services. Federal agencies were instructed to publish guidance for their respective recipients in order to assist them with their obligations to LEP persons under Title VI. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

#### **Department of Transportation LEP Guidance**

The U.S. Department of Transportation (DOT) published revised LEP guidance for its recipients on December 15, 2005, which states that Title VI and its implementing regulations require that DOT recipients take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. The Federal Transit Administration published its LEP Guidance in its Circular 4702.1A “Title VI and Title VI Dependent Guidelines for FTA Recipients” on April 13, 2007, which requires recipients to develop an LEP implementation plan consistent with the provisions of Section VII of the DOT LEP guidance.

## LEP Access Planning Process

To prepare a viable LEP Access Plan, TriMet conducted a Limited English Proficient (LEP) needs assessment as identified in Executive Order 13166, *Improving Access to Services for Persons with Limited English Proficiency*. The work began in June 2005, with the convening of a LEP Workgroup to conduct the assessment and report their findings and recommendations to management.

To ensure agency-wide support and participation in the assessment process, TriMet's General Manager convened the internal workgroup to examine how:

*“...we, as an organization, can best interact with the growing number of people in the region with limited English proficiency.”<sup>1</sup>*

Staff members from throughout the agency were hand-picked for the assignment and personally asked to participate. Specifically, the workgroup was to:

1. Complete a needs assessment of LEP persons in the district. The assessment was to identify high concentrations or high numbers of LEP individuals and determine if there were language barriers limiting the access of LEP persons to TriMet services.
2. Develop a draft LEP plan providing a framework for the provision of timely and reasonable language assistance to those with limited English proficiency who access TriMet's services and a method to evaluate and review the effectiveness of a LEP plan.
3. Report findings to management with recommendations and timelines for compliance with federal regulations.

Staff members from Marketing, Diversity & Transit Equity, and Legal Services were tasked with developing a work plan and helping the group complete the LEP needs assessment in a timely manner. To that end, a work plan with designated tasks and a timeline was developed<sup>2</sup>. This process allowed for a methodical, focused approach to the assessment; and helped clarify roles and responsibilities, assign tasks, and define deliverables.

Over the next several months, the workgroup members collected and analyzed census data, audited agency databases and communication materials, and conducted original research among LEP community members and TriMet bus operators.

The assessment concluded on June 20, 2006 when the LEP workgroup issued their report and recommendations to management. Following is a summary of the results from their work.

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<sup>1</sup> Limited English Proficient Persons, Fred Hansen, June 8, 2005

<sup>2</sup> See V.Appendix, 1. LEP Workgroup Work Plan

## Applying the Four Factor Analysis

In June 2005, TriMet formed an interdepartmental workgroup to address federal requirements for *assessing needs and providing services to Limited English Proficient (LEP) populations*. The LEP needs assessment conducted was based on the Four-Factor Framework outlined in the DOT LEP Guidance:

**Factor 1:** The number and proportion of LEP persons served or encountered in the eligible service population.

**Factor 2:** The frequency with which LEP individuals come into contact with your programs, activities, and services.

**Factor 3:** The importance to LEP persons of your program, activities and services.

**Factor 4:** The resources available to the recipient and costs.

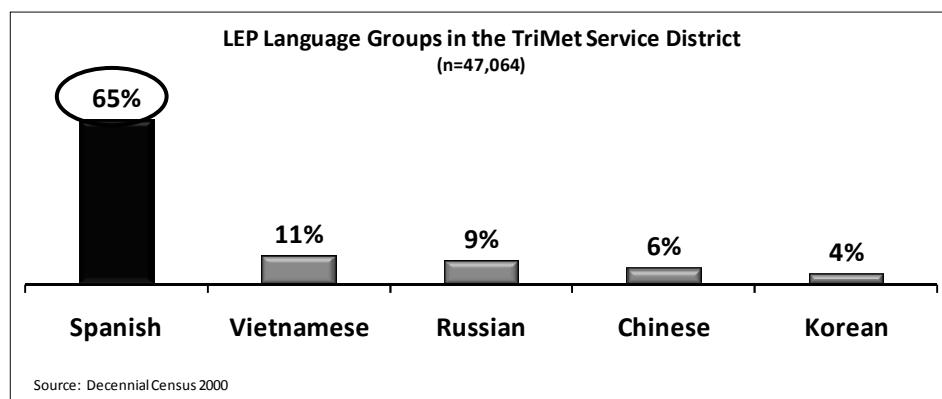
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### Factor 1: The number and proportion of LEP persons served

To conduct Factor 1, the LEP Workgroup sought quantitative and qualitative information regarding LEP populations.

- **Quantitative data<sup>3</sup>**
  - Census: Analysis of census data showed that of the total population within TriMet's service district (n=1,209,701), LEP populations (n=47,064) represent 3.89 percent, with the largest proportion consisting of Spanish speaking LEPs (65%). LEP populations meeting the DOT definition of LEP<sup>4</sup> "Safe Harbor" thresholds (5% or 1,000 individuals, whichever is less) included speakers of:
    - ✓ Spanish (30,816)
    - ✓ Vietnamese (5,185)
    - ✓ Russian (4,095)
    - ✓ Chinese<sup>5</sup> (2,775)
    - ✓ Korean (2,070)

**Figure 1: LEP Language Groups**



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<sup>3</sup> 2000 Decennial Census

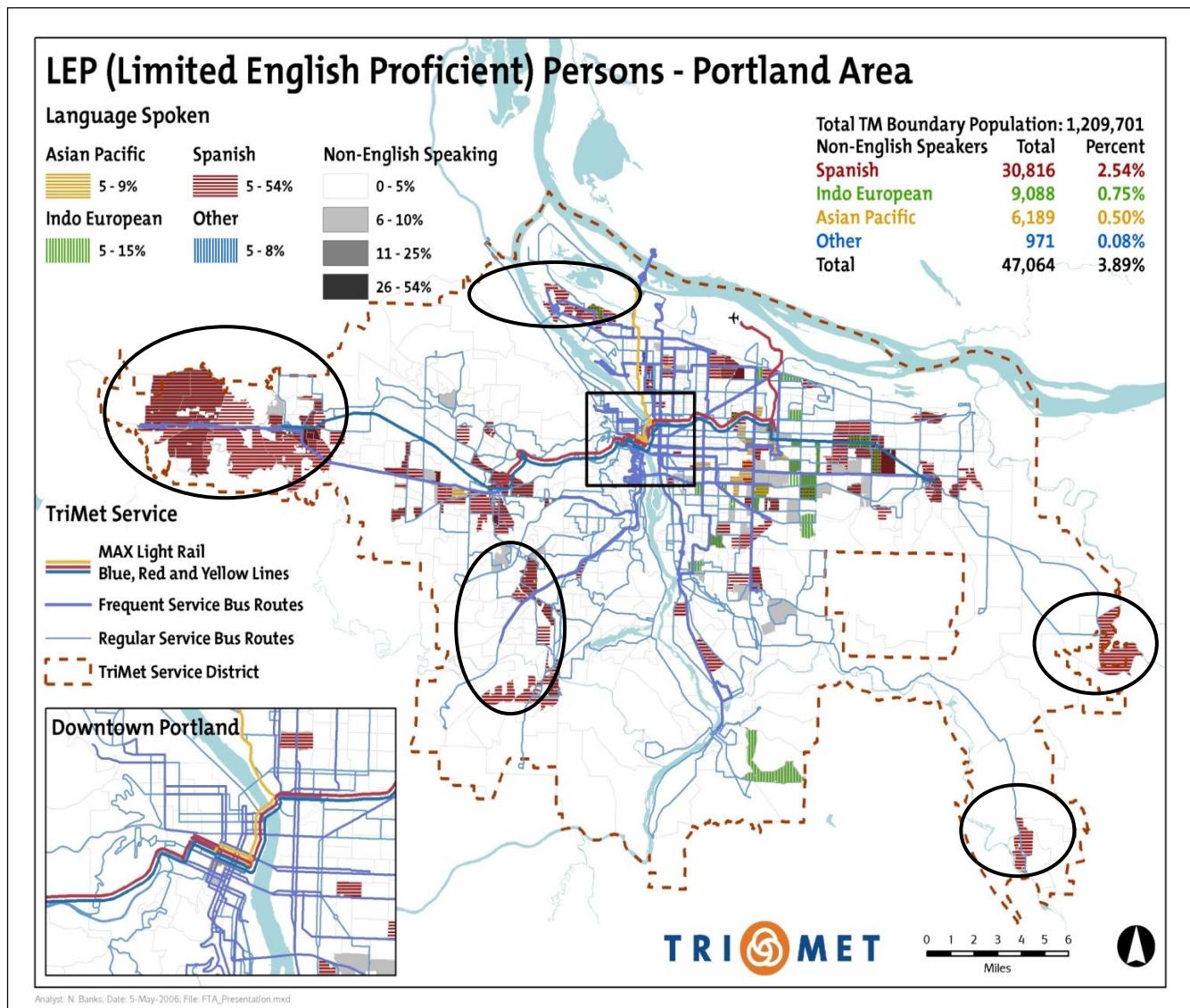
<sup>4</sup> Speak English "less than well" based on 4-point scale: Very well, well, not well, not at all

<sup>5</sup> Traditional Mandarin Chinese

## Factor 1 (Continued)

- The LEP Map: Using data from the 2000 Decennial Census and TriMet GIS mapping services, the following map shows the concentrations of LEP communities within the TriMet service district coupled with an overlay of TriMet bus and rail service. In studying the map, the workgroup noted that:
  - ✓ Spanish-speakers were more widely dispersed than the other language groups – forming both urban and semi-rural communities.
  - ✓ Most of the urban LEP populations located themselves along well-served transit corridors.

**Figure 2: LEP Population Clusters and TriMet Service**



## Factor 1 (Continued)

- **Qualitative information** received from community groups<sup>6</sup> serving the LEP populations indicated that:
  - Census and GIS representations of LEP population clusters throughout the region were reliable.
  - Some Spanish-speaking LEP persons were arriving from a diversity of rural areas of Latin America with a wider variety of regional-specific dialects and increasing levels of illiteracy – both in Spanish and English.

## Conclusions and Recommendations

1. Given the large size and dispersed nature of the Spanish-speaking LEP population, this would be the group to focus on first.
2. The outreach and communication efforts among Spanish-speaking LEP customers would need to be tailored for both urban and semi-rural populations, and people with varying levels of literacy.

**NOTE:** Other sources of population data considered for use included LEP data from school districts within the TriMet boundaries. However, given the robust set of regional population data derived from the Census coupled with the feedback from area service agencies, the workgroup deemed that the data used was sufficient for the tasks at hand.

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<sup>6</sup> Community Based Organizations (CBOs), Faith Based Organizations (FBOs), business organizations, and city and county social service agencies

## Factor 2: The frequency of contact

To conduct Factor 2, the LEP Workgroup concentrated on an internal audit of LEP contact information generated by agency personnel, technological systems, and survey research. In the context of Factor 2, “relevant programs, activities, and services provided” were defined as:

**Ridership, Fares, and Customer Information** as these are the means by which people use or inquire about transit services and programs.

- **Overview:** Limited survey information has been available providing ethnicity/race data and LEP status. Otherwise, there was **no comprehensive process in place** to routinely capture LEP contact data – either from technological systems or from standard survey data. Some information was obtained from bus operator interviews, but no ongoing data gathering system exists to routinely discuss LEP contacts with bus operators or frontline staff.

**Table 1: Methods to Capture Frequency of LEP Interactions**

Data Sources	LEP 2005 Information Audit			
	Ethnicity Race	LEP Status	Frequency of Contact	Trip Purpose
<b>RIDERSHIP</b>				
Automatic Passenger Counters (APC)	No	No	No	No
LIFT and ATP records	Yes	No	Yes	Yes
Survey research	Yes	Yes	Yes	Yes
<b>FARES</b>				
Ticket vending machines (TVMs)	No	No	No	No
<i>trimet.org</i> web sales	No	No	No	No
Outlet sales statistics	No	Yes	No	NA
Survey research	Yes	No	Yes	Yes
<b>CUSTOMER INFORMATION</b>				
<u>238-Ride - Language assistance</u>				
Customer service issues	No	Yes	Yes	No
Trip planning assistance	No	Yes	Yes	No
Transit Tracker by Phone or Internet	No	No	Yes	No
TriMet Ticket Office (TTO)	No	Yes	No	No
Multilingual brochures/rider alerts	NA	NA	No	NA
Multi-language web pages	No	No	Yes	NA
NA = Not applicable				

- **Call Center Data:** The agency's three call centers provided call data for the 2005 LEP Needs Analysis. In looking at the data provided, less than one half of one percent (<0.5%) of the calls to the call centers requested language assistance. However, of those asking for assistance, the majority (82%) asked for help in Spanish.

**Table 2: Call Center Language Assistance Requests**

CALL CENTER	Total Calls Per Month	Requests	
		Language Assistance	Spanish
238-RIDE	30,000	130	113
Accessible Transportation Program (ATP)	26,000	126	97
LIFT contracted paratransit service	43,000	75	62
<b>TOTALS</b>	<b>99,000</b>	<b>331</b>	<b>272</b>
NOTE: ATP includes LIFT, medical transportation for Medicaid-eligible riders in Oregon Health Plan, and oversees funding assistance provided by TriMet to community based volunteer and agency transportation through the <i>Ride Connection</i> program.			

## Factor 2 (Continued)

- **Bus Operator Interviews** (n=203): The TriMet bus operator is often the first contact LEP persons will have with the agency. Thus, operator input on the subject of communicating with LEP customers is critical. To gain operator perspectives, in-person interviews were conducted to:
  1. Find out how often bus operators encountered LEP customers,
  2. Learn how operators communicated with LEP passengers, and
  3. Find ways to enhance those communication events.

Results from the interviews indicated:

- Bus operators encountered LEP customers on 45 of 93 bus routes (48%) in the system.
- Operators reported varying degrees of communication problems with LEP customers depending on: the number of LEP passengers encountered; operator experience in the field; operator ability to speak *at least a few words* of a foreign language; and operator and customer awareness of TriMet foreign language materials and services.
- To communicate with LEP passengers, operators: used sign language; pointed at maps; or asked other passengers for assistance with interpreting.
- Operators said they would be helped most by: tips on how to communicate with LEP customers; assistance learning second languages; and practical foreign language materials for use in the field.

## Conclusions and Recommendations

1. Because of the lack of comprehensive, reliable LEP contact data, it was recommended that TriMet find a way to efficiently and effectively capture and report this data on a regular basis.
2. Operator interviews indicated the need for an effective training program to help front-line employees work effectively with LEP customers. The training initiatives could include multi-cultural awareness, how to work with non-English speaking passengers, language lessons and opportunities to help design language materials for use in the field.

### **Factor 3: The importance to LEP persons of your program, activities, and services**

To address Factor 3, Tri Met staff designed and conducted community “roundtable discussions” to find out how often LEP customers rode TriMet, for what purposes, and problems encountered. In the context of Factor 3, the agency’s “most critical services” were defined as **Fares and Tickets, Routes and Schedules, and Safety and Security**. These areas were chosen because language barriers in these areas could:

- a. limit a person’s ability to gain the *full benefit* from services, or
- b. in the areas of safety and security – place a person in physical danger.

Four roundtables were conducted – two in Spanish, one in Russian, and one in Vietnamese. Discussions were led by a member of each community and interpreters were available for TriMet staff. Results from these LEP community roundtables indicated that:

- TriMet programs and services were very important to LEP community members as most said they were transit dependent<sup>7</sup> and relied on transit for almost all of their travel in the region (work, school, visiting, shopping, etc.)
- The primary frustrations LEP customers experienced using TriMet were consistent with those experienced by other TriMet riders such as: late buses, pass-ups, concerns for personal safety, rude employees, fares, confusion over zones boundaries, and transfers. However, language barriers inhibited satisfactory resolution of LEP customer issues.
- Most participants were unaware of the language services TriMet has to offer. Thus, few had ever made use of those services.
- Because many LEP customers were new to the country and/or don’t understand English well, they relied heavily on family, friends and trusted community organizations to help them adapt and find their way.

### **Conclusions and Recommendations**

1. TriMet is an important service for the discussion group participants, as evidenced by their transit dependence, ridership frequency, and variety of transit trips taken.
2. For LEP customers, resolving customer concerns is hindered by the language barriers between them and agency personnel.
3. The general lack of awareness of the agency’s multilingual services among the target audiences points out the need for finding the proper venues for promoting these services.
4. Reliance on trusted sources for information underlines the importance of growing and maintaining personal relationships within the LEP communities.

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<sup>7</sup> Transit Dependent: I don’t have a car available to use, or I can’t drive / don’t know how to drive

#### **Factor 4: The resources available to the recipient and costs**

To conduct Factor 4, the LEP Workgroup listed the agency's language assistance services and the estimated cost for each. Results from the review show that:

The majority of agency resources have traditionally gone to the telephone language assistance service. At **\$35,000**, this is the most expensive of the services provided, especially given that less than one half of one percent of all calls received required the assistance of interpreters. None-the-less this is an important service and one to continue.

**Table 3: Resources Available for LEP Activities**

ITEM	Translation Cost	Print Quantity	Print Cost
Each translated web page	\$ 500	NA	NA
Telephone translation/interpreter services	\$ 35,000	NA	NA
How To Ride Brochures	\$ 1,307	20,000	\$ 4,798
Bus stop closure translation	\$ 80	NA	NA
Operator "Paddle" -- Card w/multi-language words and phrases for riding	\$ 200	800	\$ 2,446
Surveys (Origin & Destination)	\$ -	60,000	\$ 3,396
Transit Tracker by Telephone (Interpreter)	\$ 100	NA	NA
Safety & Security Handbills			
<i>Safety handbill</i>	\$ 80	5,000	\$ 843
<i>Security Rider tip card</i>	\$ 80	5,000	\$ 854
Spanish language coloring book	\$ 225	5,000	\$ -
Chinese and Spanish Yellow page ads	\$ 200	1	\$ -
Fare survey	\$ 110	50,000	\$ 4,665
Ticket Vending Machine (TVM) screens	\$ 135	NA	NA
<b>TOTALS</b>	<b>\$ 38,017</b>		<b>\$ 17,002</b>

NOTE: Data provided for the 2005 LEP Needs Analysis

#### **Conclusions and Recommendations**

1. Results from the review show that TriMet has been proactively seeking ways to meet the needs of the region's LEP communities on a relatively small budget for many years. And these are services the agency should continue to provide.
2. To help contain costs, continue current LEP initiatives, and launch new programs or major efforts (such as translating and printing *vital* and *non-vital documents*) in conjunction with regularly scheduled reprinting and/or replacement of existing materials.
3. To grow the program, new sources of internal and/or external funding would be needed.

## IV. LEP ACCESS PLAN

### The LEP Access Plan

After an extensive review of the LEP populations and their needs, the LEP Workgroup recommended a two-tiered approach to meeting the needs of LEP populations in the TriMet district. Tier One retains successful programs and activities designed to meet the language needs of LEP populations. Tier Two identifies new areas of focus to further the agency's goal of providing LEP customers with *meaningful access* to TriMet programs and services.

#### LEP Population Identification

Analysis of 2000 U.S. Census data showed that of the total population within TriMet's service district LEP populations represent 3.89 percent, with the largest proportion consisting of Spanish speaking LEPs, followed by Vietnamese, Russian, Chinese, and Korean.

- **Spanish – 65%\***
- Vietnamese – 11%
- Russian – 9%
- Chinese – 6%
- Korean – 4%

\* Because the Spanish-speaking LEP population is the largest LEP community (65%) in the region, this would be the group to focus on first.

#### LEP Activities

##### ***Tier One: Successful Activities to Continue***

After an extensive review, the LEP Workgroup identified several areas where TriMet has long been working proactively to address LEP community needs. These were identified as **activities to continue**:

1. Provide telephone interpreters via 238-RIDE to assist LEP customers in virtually any language.
2. Print *How To Ride* brochures in the five languages LEP languages.
3. Feature key transit information and online Trip Planner in Spanish on TriMet's website
4. Continue *Transit Tracker by Phone* information in Spanish via **238-RIDE** and move the Spanish "prompt" to the front of the menu.
5. Place foreign-language ads in publications serving second language populations to demonstrate TriMet's commitment to full information; to share current significant, service-related announcements; and to increase comfort levels regarding access to information in a native language.
6. Record MAX (light rail system) announcements in both Spanish and English.
7. Continue Spanish-language interface for Ticket Vending Machine (TVM) transactions.
8. Establish and nourish partnerships and continue to work closely with community organizations that serve LEP populations.

## LEP Access Plan (continued)

### **Tier Two: New Areas of Focus**

The LEP Workgroup also identified additional actions to further TriMet efforts to provide LEP populations a *meaningful access* TriMet programs and services:

1. **Language Assistance:** Provide notice of right to language assistance, at no cost, for:
  - a. Non-vital yet important outreach documents. Examples include project fact sheets, TIP<sup>8</sup> open house notices, and other open house materials
  - b. In-person interpreter services, upon request, for public meetings and important events.
2. **Vital Documents:** Determine which documents are **vital** for translation, and choose the format(s) to most effectively communicate the messages contained in vital documents.
3. **Training:** Develop curriculum and train all front line and second level staff to effectively engage and respond to LEP customers.
4. **Definitions and Standards:** Develop a method to ensure consistency in the application of competency standards for interpreters and translators.
5. **Customer Information:** Provide timely, relevant information about TriMet programs and services to the LEP communities in the TriMet service district.
6. **Outreach:** Conduct culturally-competent outreach to LEP communities to increase awareness of and access to TriMet services and programs.
7. **Research and Administration:** Develop a means to assess and monitor the effectiveness of TriMet's LEP Plan internally and externally on two levels:
  - a. Ongoing review to immediately address any critical issues and make changes to the LEP Access Plan as needed.
  - b. Annual review to include any changes in demographics, types of services, or other LEP community needs.

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<sup>8</sup> Transit Investment Plan, TriMet's rolling five-year plan describes focused investments in service, capital projects (building new MAX lines, for example) and customer information, designed to meet regional transportation and livability goals.

## LEP Access Plan Implementation Calendar

In consideration of implementation factors including available resources and costs, the LEP Plan utilized a staggered implementation schedule over several years. The following calendar illustrates LEP activities and implementation dates.

ACTIVITIES		X	= Target completion				
			= Estimated completion				
		✓	= Actual completion				
TRIMET FISCAL YEAR							
ACTIVITIES		FY06	FY07	FY08	FY09	FY10	
<b>1. Language Assistance</b>							
1A Determine process for providing notice of right to language assistance, at no cost, on non-vital yet important outreach documents.			X		✓		
1B Determine process for use of in-person interpreter services upon request for public meetings and important events (community relations staff will provide notification to the community about availability of interpretive services).		X			✓		
1C: Create sign in multiple languages informing LEP clients about available language services and post at TTO.			X			✓	
1D: Provide telephone interpretation for basic transit questions and trip planning assistance in virtually any language		✓					
<b>2. Vital Documents</b>							
2A Written translations of vital documents in each of the five languages, AND/OR replacing text with pictograms/universal icons whenever possible.			X		✓		
1. Applications, consent forms, letters containing important information regarding participation in a program.					✓		
2. Notices pertaining to the reduction, denial, or termination of services or benefits, the right to appeal such actions or require response from beneficiaries.					✓		
3. Notices advising LEP persons of the availability of free language assistance, and other outreach materials.					✓		
2B Monitor for new documents that may be considered "vital."	X				✓		
<b>3. Training: Human Resources</b>							
3A Develop curriculum and train frontline and other key staff in:							
1. awareness of type of language services available		X			✓		
2. how staff and/or LEP customers can obtain these services		X			✓		
3. how to respond to LEP callers		X			✓		
4. how to respond to correspondence from LEPs		X			✓		
5. how to respond to LEPs in-person		X			✓		
6. how to document LEP needs					✓		
7. how to respond to civil rights complaints		X			✓		
8. LEP guidelines and procedures			X		✓		
3B Incorporate LEP plan information into the new employee orientation, handbook and TriNET.			X		✓		
3C Coordinate training with HR and Diversity & Transit Equity					✓		
3D Survey TriMet staff to determine existing bilingual resources					✓	All new hires are asked to indicate languages spoken other than English.	
3E Develop plan defining conditions under which TriMet staff would be asked to help with interpretations or translations between the agency and customer.					✓	When appropriate bilingual staff members will provide impromptu "spot checks" on translations and for limited interpreting services.	

<b>LEP ACCESS PLAN IMPLEMENTATION CALENDAR: FY06-FY11</b>			<input checked="" type="checkbox"/>	<b>= Target completion</b>					
			<input type="checkbox"/>	<b>= Estimated completion</b>					
			<input checked="" type="checkbox"/>	<b>= Actual completion</b>					
<b>ACTIVITIES</b>			<b>TRIMET FISCAL YEAR</b>			<b>STATUS</b>			
			<b>FY06</b>	<b>FY07</b>	<b>FY08</b>	<b>FY09</b>	<b>FY10</b>	<b>FY11</b>	
<b>4. Definitions and Standards: Marketing</b>									
4A Determine desired English competency standards for interpreters and translators.			<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>				Guidelines written and approved. Competency wording included in contract language.
4B Establish an agency-wide workflow whereby all written translation requests are routed through and managed by Marketing to ensure quality and consistency.			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>					Ongoing educational process. Creative Services and LEP Coordinator handle the majority of translations.
4C Develop/review contract language to ensure all contractors providing goods and services for TriMet are in compliance with Title VI regulations			<input checked="" type="checkbox"/>						Completed and ongoing activity.
<b>5. Customer Information: Marketing</b>									
5A Provide information in multiple languages about civil rights complaint process and post at TTO and TriMet website			<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>					Title VI, see <a href="http://trimet.org">trimet.org</a> Language Services page
5B Provide information in multiple languages about general complaint process			<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>		Practice is to contact the LEP coordinator.
5C Create protocol for responding to foreign language correspondence and communication.			<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>		Practice is to contact the LEP coordinator, 238-RIDE or Creative Services.
5D Provide information in multiple languages using the four-factor analysis to determine need.				<input checked="" type="checkbox"/>					Ongoing process -- done as needed
<b>6. Outreach: Marketing</b>									
6A Develop and implement culturally-competent outreach to increase awareness and access to services.				<input checked="" type="checkbox"/>					TriMet has been providing rider information to non-English speaking audiences for many years. The LEP Program Grant received from the FTA has enabled the agency to design, test, and launch a Spanish-language program for the region.
1. Develop culturally appropriate material in the target language.					<input checked="" type="checkbox"/>				
2. Test materials with key constituencies.					<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	
3. Establish a relationship and partner with key community leaders and organizations of target audience.				<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
4. Individual one on one meetings, telephone calls, and e-mail messages to target leadership.					<input checked="" type="checkbox"/>				
5. Visit/participate in scheduled community events of target audience to promote message.					<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
6. Target outreach to key gathering places such as churches, schools, community colleges, libraries, and social service and community activist organizations.					<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
7. Promote message with community media—create earned media opportunities.					<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
8. Use TriMet vehicles and properties to display message in target language.					<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
9. Develop print, radio, and television ads in target languages.					<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
10. Use TriMet personnel that reflect target audience to promote message.					<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		

LEP ACCESS PLAN IMPLEMENTATION CALENDAR: FY06-FY11		X	= Target completion			
			= Estimated completion			
		✓	= Actual completion			
ACTIVITIES		TRIMET FISCAL YEAR				
		FY06	FY07	FY08	FY09	FY11
<b>7. Research and Administration</b>						
7A	Research plan approval				✓	LEP Oversight Committee
7B	Guidelines review and audit				✓	LEP Oversight Committee
7C	Add a question to the 2009 O&D Survey to assess respondents' English proficiency and primary spoken language. Modeled after US Census	✓				Research staff. Done in 2006 and will repeat in 2011.
7D	Literature Review	Rutger's University on behalf of Homeland Security is conducting a literature review that will be incorporated into final report.				
7E	Conduct an AFTER evaluation of TriMet's LEP plan to gauge its effectiveness and determine if updates are needed every two years.					Beginning in Spring 2011 internal and external reviews will be conducted to see how the program is working for the communities, their representatives, and TriMet and its employees.
<b>COMMUNITY EVALUATION</b>						
1)	Determine the number of LEP individuals in TriMet's service district					
2)	Seek feedback from LEP communities, including customers and community organizations, about the effectiveness of TriMet's LEP					
a)	Assess awareness of LEP program among the Spanish-speaking LEP community					
b)	Assess whether existing language assistance services are meeting the needs of LEP clients.					
<b>EMPLOYEE EVALUATION (Operators &amp; Staff)</b>						
3)	Assess whether operator and internal staff members understand TriMet's LEP policies and procedures, how to carry them out, and whether language assistance resources and arrangements for those resources are still current and accessible.					Conduct in-person interviews with operators and online survey with other staff to gauge awareness of LEP
7F	Draft post-grant LEP monitoring plan and guidelines				✓	Program guidelines drafted and will be implemented once the grant expires. Changes to the monitoring plans will be made as needed.
7G	Implementation and oversight of post-grant LEP program					
7G.1	Day-to-day Administration of LEP program, ensuring correct program implementation.					
7H	Provide web-based LEP information resources for peer-to-peer sharing.					
7I	Prepare LEP Program PowerPoint for divisional briefings				✓	
7J	LEP Plan				✓	
<b>8. Capital Projects &amp; Facilities</b>						
8A	Code businesses and residents who are LEP along construction projects and keep in TriMet's database.	✓	✓			Ongoing, standard operating procedure.
8B	Develop an outreach plan targeting LEP residents and businesses in construction areas.	✓	✓			
<b>9. LEP Data Tracking</b>						
9A	Identify geographic areas within the service district that have high concentrations of LEP individuals.	X	✓			Ongoing process that generally coincides with Title VI reporting. This is done as needed by the agency's GIS department.
9B	Identify routes serving areas with high concentrations of LEP individuals	X	✓			
9C	Identify service disruptions in areas with high concentrations of LEP individuals and translate appropriate signage.	X	✓			
9D	Develop formal procedures for documenting the number of requests by LEPs for ticket/pass purchases at TTO and from LIFT personnel.		X		✓	Reports from TTO and LIFT personnel are available upon request.
9E	Determine ability to track TVM transactions completed in Spanish.	X			✓	Not possible at this time due to TVM programming.

## **LEP Access Plan Implementation Guidelines**

In June 2008 TriMet's General Manager formed a multi-divisional LEP Advisory Committee to assist in the task of implementing LEP measures to further the agency's effectiveness in providing meaningful access to LEP customers.

After the Advisory Committee orientation meetings, a LEP Guidelines Review Subcommittee was formed out of the broader group and given the task of developing a set of guidelines by which LEP access efforts could be implemented and evaluated. The LEP Guidelines Subcommittee, led by TriMet's Marketing Director, worked on developing guidelines in the following areas:

- 1. Language Assistance** - To provide notice of the right to language assistance on key non-vital documents (fact sheets, open house materials).
- 2. Vital Documents** - To determine which documents are vital for translation, like applications and consent forms.
- 3. Training** - To prepare front line and staff for engaging and responding to LEP customers.
- 4. Definitions and Standards** - To ensure consistency in the application of competency standards for interpreters and translators.
- 5. Customer Information** - To provide timely, relevant information about TriMet programs and services.
- 6. Outreach** - To conduct culturally-competent outreach to increase awareness and access to TriMet services.
- 7. Research and Admin.** - To assess and monitor effectiveness of TriMet's LEP plan.

Following are the guidelines developed.

It is important to note that these guidelines are to be considered "living documents" and subject to change as a result of ongoing agency monitoring and review of the LEP Plan. New guidelines may be developed as the agency's LEP access programs develop and lessons learned are incorporated into the Plan.



## **1A: Notice of Right To Language Assistance, Non-vital Outreach Documents**

Submitted by: Language Assistance Subcommittee  
Number: 1A  
Proposed date: 3/10/09  
Adopted date: (per LEP Guideline Review Committee)

### **PURPOSE**

To provide notice of right to language assistance, at no cost, on non-vital yet important outreach documents. Examples may include project fact sheets, service planning open house notices, and other open house materials.

### **PRACTICE**

TriMet produces hundreds of non-vital documents that may be of interest to LEP community members. Key, non-vital documents should include a notice in the five LEP languages alerting customers that the document is available to be translated upon request in accordance with this Guidance.

### **RESPONSIBILITY**

Marketing, Community Affairs, and Communications

### **APPROACH**

In the future as in the past, this practice is guided by the outcome of the four-factor analysis whereby there is a review of:

1. The number and proportion of eligible LEP constituents;
2. The frequency of LEP individuals' contact with the program;
3. The nature and importance of the program; and
4. The resources available, including costs.

### **PROCEDURE**

1. The Project Manager, working with the LEP Coordinator, will make the final determination if a document warrants including the LEP notification.
2. Documents should include a box with following information translated into the five LEP languages – “*To access this information in (language), please call 503-238-RIDE (7433).*”
3. Document name and date should be noted in the bottom right corner of the last page to aid the Customer Service Department in efficiently identifying the document.
4. When the LEP customer calls Customer Service, staff will work with the caller and (when necessary) on-call interpreters to determine whether a verbal or a written response is desired.
5. Customer Service staff will then submit the request to appropriate department for processing.
6. If translation is required, every effort will be made to provide a translated document within 10 working days of the request.

**STATUS**

Complete and ongoing

**Example of format for LEP notice in the 5 LEP Languages:**

To access this information in  
\_\_\_\_\_ please call:  
**(503) 238-RIDE (7433)**



## **1B: Use of In-person Interpreter Services at Public Meetings**

Submitted by: Language Assistance Subcommittee  
Action Number: 1B  
Proposed date: 3/10/09  
Adopted date: (per LEP Guideline Review Committee)

### **PURPOSE**

To provide, at no cost, in-person interpreter services upon request for public meetings, and important events.

### **PRACTICE**

Public meetings are an opportunity for the public to learn about, and at designated times, participate in the agency's decision-making process. Subject to application of the four factor analysis, the agency will take reasonable steps to provide LEP community members with the opportunity to participate in agency decisions in accordance with established agency procedures. These steps will include:

1. provide notification that interpretive services are available for meetings; and
2. provide such services when request is made 48 hours in advance of the meeting.

### **RESPONSIBILITY**

General Manager's Office, Legal Services, Community Affairs, Transportation Planning, and Communications and Marketing

### **APPROACH**

In the future as in the past, this practice is guided by application of the four factor analysis whereby there is a review of:

1. The number and proportion of eligible LEP constituents;
2. The frequency of LEP individuals' contact with the program;
3. The nature and importance of the program; and
4. The resources available, including costs.

### **PROCEDURE**

#### **Call-In Requests**

As determined after application of the four factor analysis, when publicizing public meetings, the agency should provide the following information in the key LEP languages:

"To request interpreter services for TriMet meetings, please call 503-238-RIDE (7433) 48 hours in advance of this meeting."

Customer Service staff will immediately submit the request to the coordinating department, who will hire the appropriate interpreter for the meeting.

## **Drop-Ins**

To better assist LEP community members who come to public meetings and **have not requested an interpreter in advance:**

1. Staff should provide the guest with a LEP handbill – provided in five languages – that outlines procedures for receiving information in another language (verbal or written).
2. The handbill also will provide information on how to request interpreter services and how they can testify at public meetings.
3. Staff should prominently display the following sign at registration in the key LEP languages:

***“To access information from this meeting, please call (503) 238-7433.”***

**Targeted Public Meetings:** When TriMet is hosting public meetings in a particular geographic area with a known, significant LEP population:

1. Meeting notices should be produced and distributed in the key LEP language(s) encouraging area residents to: a) participate; and b) request interpreter services 48 hours in advance of the meeting.
2. TriMet will provide at least one qualified interpreter at these meetings who is fluent in the designated LEP language(s).

## **STATUS:**

Complete and ongoing



## **2A: Written Translation of Vital Documents**

Submitted by: Vital Documents Subcommittee  
Action Number: 2A  
Proposed date: 3/10/09  
Adopted date: (per LEP Guideline Review Committee)

### **PURPOSE**

To implement a procedure to provide for written translation of vital documents.

### **PRACTICE**

The agency will take reasonable steps to ensure that LEP persons have meaningful access to TriMet programs and services, with respect to identification and written translation of vital documents, as set forth in this Guidance.

### **RESPONSIBILITY**

Marketing and Legal Services

### **APPROACH**

This Guideline assumes that, to be truly useful, translated materials must communicate clearly and in a culturally appropriate way with the audience. The documents must – to the greatest extent possible – preserve accuracy in meaning, and not be overly-burdened by legalistic terms and technical vocabulary.

In the future as in the past, the determination as to whether to provide a written translation of a vital document is guided by application of the four factor analysis whereby there is a review of:

1. The number and proportion of eligible LEP constituents;
2. The frequency of LEP individuals' contact with the program;
3. The nature and importance of the program; and
4. The resources available, including costs.

Whether or not a document is deemed to be “vital” may depend on the importance of the program, information, encounter or service involved, and the consequence to the LEP person if the information is not accurate or timely. A “vital document” may include information which is critical or required to participate in or benefit from an agency program or activity. For instance, applications for bicycle safety courses should not generally be considered vital, whereas access to safe driving handbooks could be considered vital.

Classifying a document as vital or non-vital is sometimes difficult, especially in the case of outreach materials like brochures or other information on rights and services. Awareness of rights or services is an important part of “meaningful access,” as lack of awareness may effectively deny LEP individuals meaningful access. Where the agency is engaged in community outreach efforts in furtherance of its programs and activities, the needs of populations frequently encountered or affected by the program or activity should be regularly assessed to determine whether certain critical outreach materials should be translated. Community organizations may

be helpful in determining what outreach materials may be most helpful to translate, and some such translations may be made more effective when done in tandem with outreach methods including using ethnic media, schools and religious and community organizations to spread a message.

Sometimes a very large document may include both vital and non-vital information. This may also be the case when the title and a phone number for obtaining more information on the contents of the document in infrequently encountered languages other than English is critical, but the document is sent out to the general public and cannot reasonably be translated into many languages. In a case like this, vital information may include providing information in appropriate languages regarding where an LEP person might obtain an interpretation or translation of the document.

TriMet may follow the DOT “safe harbor” guidance in providing written translations of vital documents for each language group that constitutes at least 5% or 1,000 LEP individuals, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. Translations of other documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the 5% trigger, written translation is not required but written notice will be provided in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost. Failure to provide written translations under the “safe harbor” criteria does not mean there is “non-compliance with LEP access requirements, but adherence to the “safe harbor” criteria will serve as strong evidence of compliance.

Written translation of a vital document is the replacement of a written text from one language into an equivalent written text in another language. However after application of the four factor analysis, the agency may determine to replace written text with pictograms/universal icons as the most effective method of providing meaningful access. With respect to the four factor analysis, factor 3 includes a focus on the agency’s core and most critical services including fares, service routes/schedules, and safety and security.

A vital document may include but not be limited to:

- Applications
- Consent forms
- Letters containing important information regarding participation in a program
- Notices pertaining to the reduction, denial, or termination of services or benefits and the right to appeal such actions
- Notices or letters that require a response from the beneficiary
- Notices advising LEP persons of the availability of free language assistance
- Any future documents or outreach materials that meet the definition of vital documents

## **PROCEDURE**

All requests for written translations of vital documents shall be submitted to TriMet’s LEP Outreach Coordinator for handling in accordance with the above Guideline. The LEP Outreach Coordinator will chair and periodically convene a standing subcommittee, comprised of representatives from Capital Projects, Creative Services, Customer Services, Operations, and Legal Services to identify agency vital documents and assess LEP written translation services under this Guideline.

## **STATUS**

Completed and ongoing

### **Examples of demonstration pieces prepared in Spanish**

General: “**Viaje Major**” (*Ride Better*), is a unique how-to-ride information piece prepared in a “novella” format popular with Spanish speaking customers. The how-to-ride information presented in the booklet includes: Rail system details (MAX blue, red, and yellow lines), Westside Express Service (WES) commuter train; TriMet fares; TriMet fare zones; Proof of Fare Payment; Rules of personal conduct; Trip planning in Spanish by telephone or internet.

Rules of Riding: “**Respete El Viaje**” (Respect The Ride), lists **rules for riding** such as: possessing a valid/correct fare; move for seniors and people with disabilities; don’t threaten or intimidate riders or operators; don’t be so loud you disturb others; don’t block the aisles or doors; keep pets in carriers; keep food/drinks in closed containers. These are the rules that must be followed to retain rights of ridership on the TriMet system.

Safety Notices: “**Pare. Vea. Eschuche**” (*Stop. Look. Listen.*) promotes safe behavior around trains.

**Printed Service Material: English & Spanish**

*Fares & How to Ride* is more effective for Spanish-speaking LEP customers as *Viaje Mejor* (Ride Better) and is presented in a style that is also more culturally appropriate.



## Rules for Riding: English & Spanish

**RESPECT THE RIDE.**

- Valid and correct fare is required.
- Move for seniors and people with disabilities.
- Don't threaten or intimidate riders or operators.
- Don't be so loud that you disturb others.
- Don't block the aisles or doors.
- If you bring a pet, keep it in a carrier.
- Keep food and drinks in closed containers.

**TRIMET**  
trimet.org • 503-238-RIDE

MAXIMUM PENALTY: \$250 EXCLUSION • TMC 2B-29 • trimet.org/rules



**RESPETE EL VIAJE.**

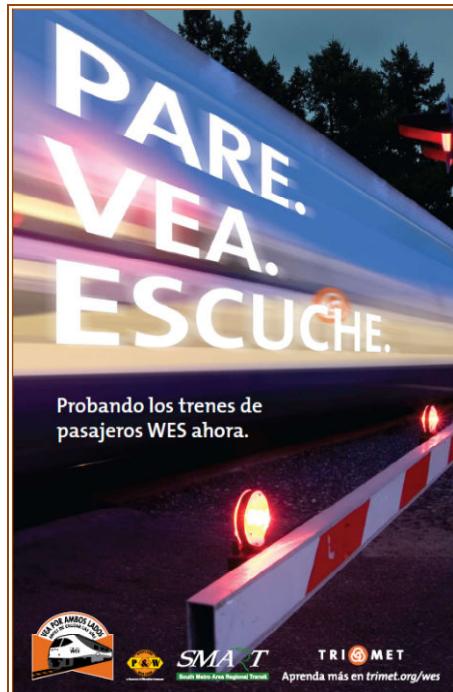
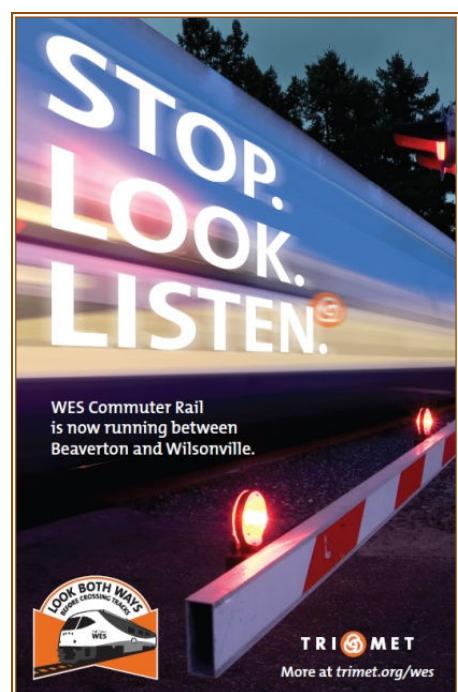
- Tener boleto o comprobante de pago.
- Cederle el asiento a los ancianos y a las personas con dificultades físicas.
- No amenazar o intimidar a otros pasajeros u operadores.
- No hacer ruidos que molesten a los demás.
- No bloquear las puertas ni los pasillos.
- Llevar animales en un portador.
- Mantener comidas y bebidas en recipientes cerrados.

**TRIMET**  
trimet.org/espanol • 503-238-7433

Penal máxima: \$250 o exclusión del sistema • Código TriMet Capítulos 2B-29



## Safety around trains: English & Spanish





### **3A: Curriculum Development**

Submitted by: Training Subcommittee  
Action Number: 3A  
Proposed date: 3/10/09  
Adopted date: (per LEP Guideline Review Committee)

#### **PURPOSE**

The purpose of the training program is to ensure that TriMet employees know their obligations to provide *meaningful access* to information and services for LEP persons. Under the guidance of the LEP Advisory Committee, the Training Subcommittee has developed and maintains a LEP training curriculum. The LEP training for front line employees and other TriMet staff focuses on the many elements of the LEP program including:

- Summary of the agency's responsibilities under the DOT LEP Guidance
- LEP populations in the TriMet service district
- Summary of TriMet's LEP Plan
- Summary of the Four Factor Analysis
- Description of the language services available to LEP customers and staff
- How staff and LEP customers can access these services
- How to work effectively with interpreters in-person and over the telephone
- How to communicate with LEP persons face-to-face, over the telephone, and in writing
- How to respond to civil rights complaints

#### **RESPONSIBILITY**

Operations Training, Director/Marketing, LEP Coordinator, Director/Human Resources

#### **APPROACH**

The approach taken with the training element of the LEP Plan employs a combination of written materials, PowerPoint slide presentation, and in-person question and answer sessions. The training was designed to give presenters the flexibility necessary to meet the informational needs unique to each workgroup. While the means of delivering information may vary from audience to audience, the core messages remain consistent throughout. Workgroups identified for training fall into three general categories:

1. Front line employees (Operators, Trainers, Customer Service Representatives, etc.)
2. Management (all levels)
3. Support staff (Administration personnel)

#### **STATUS**

The training materials have been prepared and presentations are ongoing. A summary of the plan and general guidelines for employees follows and has been incorporated into the agency's new employee orientation program materials.

# **Training Outline: TriMet Limited English Proficiency (LEP) Plan**

## **Overview**

Pursuant to Title VI and implementing regulations, public transit agencies that receive U.S. Department of Transportation (DOT) and Federal Transit Administration (FTA) funds, must take reasonable steps to provide meaningful access to limited English proficient (LEP) individuals to their programs and services. In fulfillment of those obligations, TriMet has developed a written LEP Plan, a copy of which is available at <W:\Global\LEP DEMONSTRATION PROGRAM\LEP Subcommittee Guidelines>.

Individuals are considered LEP if:

1. English is not their primary language
2. They have a limited ability to read, speak, write or understand English
3. Their LEP status poses barriers for them

**NOTE:** This includes U.S. citizens and foreign born persons

LEP legislation has its roots deep in the civil rights movement

1. Title VI Act of 1964: Title VI, 42 U.S.C. § 2000d et seq., was enacted as part of the landmark Civil Rights Act of 1964. It prohibits discrimination on the basis of race, color, and national origin in programs and activities receiving federal financial assistance.
2. 1974: The Supreme Court held that Title VI required a recipient of federal financial assistance to take steps to ensure that LEP persons were not excluded from programs and services, and that failure to do so could constitute national origin discrimination.
3. 2000: Executive Order 13166, August 2000 directs each Federal agency to:
  - Examine the current services they have for LEP customers
  - Develop a language access plan to serve LEP customers and implement that plan
  - Publish LEP guidance for its funding recipients

## TriMet LEP Plan

TriMet's LEP Plan establishes the agency's approach to taking reasonable steps to provide meaningful access to limited English proficient (LEP) individuals who use TriMet programs and services. The Plan provides for steps to ensure that:

- language barriers will not prevent staff from communicating effectively with LEP individuals to ensure safe and orderly operations; and
- limited English proficiency will not prevent customers or any member of the public from
  - accessing important programs and vital information;
  - understanding rules;
  - participating in public hearings; or
  - gaining eligibility for TriMet programs and/or services.

## LEP Needs Assessment

Between June 2005 and June 2006, TriMet initiated a review of the agency's status with respect to providing meaningful access to LEP individuals within the TriMet service district. To that end, TriMet formed an interdepartmental workgroup which performed a needs assessment to

determine the language assistance necessary to ensure limited English proficient individuals have meaningful access to TriMet services and programs.

The LEP needs assessment TriMet conducted was based on the Four-Factor Framework outlined in Section V of the DOT LEP Guidance:

- Factor 1: The number and proportion of LEP persons served or encountered in the eligible service population.
- Factor 2: The frequency with which LEP individuals come into contact with your programs, activities, and services.
- Factor 3: The importance to LEP persons of your program, activities and services.
- Factor 4: The resources available to the recipient and costs.

### LEP Populations in the TriMet Service District

Analysis of 2000 census data showed that of the total population within TriMet's service district LEP populations represent 3.89 percent, with the largest proportion consisting of Spanish speaking LEP persons. LEP populations meeting the DOT definition of LEP<sup>9</sup> and of "Safe Harbor" thresholds (5% or 1,000 individuals, whichever is less) included speakers of:

- Spanish (65%)
- Vietnamese (11%)
- Russian (9%)
- Chinese<sup>10</sup> (6%)
- Korean (4%)

### **Current LEP Plan Implementation Steps**

TriMet has implemented numerous steps under its LEP plan to ensure meaningful access by LEP individuals. These include:

- Providing key transit information and online Trip Planner in Spanish on TriMet's website.
- Providing Transit Tracker by Phone information in Spanish via 238-RIDE.
- Placing foreign-language ads in publications serving second language populations to demonstrate TriMet's commitment to full information; to share current significant, service-related announcements; and to increase comfort levels regarding access to information in a native language.
- Recording MAX announcements in both Spanish and English.
- Providing Spanish-language interface for TVM transactions.
- Establishing and nourishing partnerships and working closely with community organizations that serve LEP populations.

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<sup>9</sup> Speak English "less than well" based on 4-point scale: Very well, well, not well, not at all

<sup>10</sup> Traditional Mandarin Chinese

- Providing written translations for vital information/documents in each of the five languages and/or replacing text with pictograms/universal icons when possible. The list of documents includes but is not limited to:
  - LIFT Application
  - Honored Citizen Pass Application
  - TriMet signage related to safety/security
  - TriMet signage appearing in areas with high LEP populations
  - Summary of Rider Rules of Conduct and How to Purchase/Use Fares (based on TriMet Code)
  - Customer complaint forms
- Providing notice of second language services: Written notice provided in each of the five languages informing LEP individuals of the availability of free written translation/oral interpretation upon request for certain non-vital documents, public meetings, etc.
- Phone interpreters: Continued availability of phone interpreters via 238-RIDE to assist LEP customers in virtually any language.
- Staff training: Training staff to recognize and serve LEP customers and informing staff about TriMet's LEP services.
- Monitoring LEP program: Ongoing LEP check-ups to make sure TriMet continues to be in compliance; annual reviews of LEP program, for the first five years. This will ensure that the elements of the LEP program continue to meet the needs of TriMet's LEP populations.

### **TriMet's LEP Coordinator: (503) 962-5813**

TriMet's LEP Plan is monitored and overseen by TriMet's LEP Coordinator. Given the large size of the Spanish-speaking LEP population, the LEP Coordinator's initial focus is on the Spanish-speaking LEP customers. Overall, the LEP Coordinator provides:

- A central resource to community residents, LEP community organizations, and TriMet staff
- Community outreach and training for LEP customers
- LEP training for agency staff
- Manages translation/interpretation services
- Develops applicable criteria and standards for interpretation/translation
- Oversees and provides more in-depth LEP training for TriMet staff whose job functions include **frequent** contact with LEP persons

### **General Guidelines for Employees**

- ✓ If any employee is contacted by a customer who has limited English proficiency, providing access to 238-RIDE is the recommended approach. The employees staffing the 238-RIDE phones have access to translation services and are best prepared to assist the LEP individual.
- ✓ If the request is in person: Have the LEP individual contact the 238-RIDE number where interpreters are available and can assist.
- ✓ If the request is in writing: Forward the document, whether electronic or hardcopy, to the Manager of Creative Services.
- ✓ If the request is via telephone: Transfer the call to 238-RIDE where interpreters are available and can assist the customer.
- ✓ If the request is a Civil Rights Complaint: Forward the request to the LEP Coordinator at CS/2.



### **3B: Incorporate LEP Information Into Employee Environment**

Submitted by: Training Subcommittee  
Action Number: 3B  
Proposed date: 3/10/09  
Adopted date: (per LEP Guideline Review Committee)

#### **PURPOSE**

Establish a procedure to incorporate LEP Plan information into the employee environment.

#### **RESPONSIBILITY**

Operations Training, Director/Marketing, LEP Coordinator, Director/Human Resources

#### **APPROACH**

The approach taken with this element of the training program was to identify the various means of delivering information to TriMet employees. The most effective communication channels identified are varied in form: in-person training, employee meetings, written materials, and electronic delivery systems.

- Training sessions:
  - New employee orientation
  - Operator training program
  - Management training and development – “TriMet U”
- Meetings:
  - Maintenance and facilities division meetings
  - Administrative staff departmental meetings
  - Executive sessions
- Written materials:
  - TriMet Employee Handbook
  - Employee newsletter – **Express-line**
  - Employee notices
- Electronic media:
  - TriMet’s internal website – **TriNET**
  - Bulletins and newsletters

#### **PROCEDURE**

The procedure to incorporate the LEP plan information into new employee orientation, handbook, and TriNET will conform to existing procedures used to provide employee required information.

#### **STATUS**

Completed and ongoing.



## **4A: Language Skills Competency Standards for Interpreters and Translators**

Submitted by: Definitions and Standards Subcommittee  
Action Number: 4A  
Proposed date: 3/10/2009  
Adopted date: (per LEP Guideline Review Committee)

### **PURPOSE**

Consistently apply competency standards for interpreters and translators.

### **PRACTICE**

Interpretation and translations arranged by TriMet will be performed by approved vendors and/or individuals whose competency has been established based on standards developed by the language services profession.

### **RESPONSIBILITY**

Marketing and Customer Service

### **APPROACH**

This task will be accomplished using a combination of methods to provide reliability, flexibility, and cost savings:

1. Work with professional organizations offering services in the fields of interpreting and translation.
2. Bilingual TriMet staff members.
3. Evaluate and apply key elements from successful programs from State and local governments and healthcare providers.

### **PROCEDURE**

Using the approach summarized above, TriMet will:

1. Ensure that all interpreters and translators working for TriMet meet the following standards:
  - a. Communicate fluently – orally and in writing – in both English and the primary language of the LEP individual.
  - b. Demonstrate cultural understanding of the LEP customer served.
  - c. Accurately and impartially interpret and/or translate to and from such languages and English.
  - d. Demonstrate an understanding of the role and the ethics associated with being an interpreter or translator.

2. TriMet will:
  - a. When appropriate, train interpreters and/or translators in specialized terms and concepts associated with TriMet policies, services and activities.
  - b. Instruct the interpreters and translators that they should not deviate into a role as a counselor, legal advisor, or any other role aside from interpreting or translating.
  - c. Ask interpreters and translators to attest that they do not have a conflict of interest.
  - d. Incorporate language into contracts requiring vendors to certify their proficiency in target languages.

## STATUS

For formal interpreter or translator needs:

1. For Spanish translations and interpreting, TriMet's bilingual (English/Spanish), LEP Coordinator is our primary resource for nearly all Spanish-language interpreting and translations.
2. **Optimal Phone Interpreters:** The contracted phone interpreter service used by TriMet for foreign language interpreters. The interpreters help customers calling for general trip planning assistance and to make reservations for LIFT and Medical Transportation Services. As part of this contract, TriMet requires expert, professional interpreters trained in telephone interpretation, customer service skills and confidentiality issues.
3. **IRCO<sup>11</sup>:** Employs experienced interpreters of refugee and immigrant languages in the State of Oregon. Since professional interpretation certification through the State of Oregon is not available for many of the languages IRCO specializes in, they have developed their own testing and evaluation procedures to fill in the gaps. IRCO staff works to ensure that each interpreter is qualified for the specific job. Interpreters are held to the highest standards of confidentiality and all are fully insured. IRCO is able to provide interpreting and translating services for virtually any language needed.

For informal, “spot checks” on translations and for limited interpreting services, bilingual TriMet staff may provide assistance. Assistance may be received from TriMet volunteers who speak a variety of languages including Spanish, Chinese, Vietnamese, and Russian/ Ukrainian.

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<sup>11</sup> Started in 1975, IRCO is a community-based, nonprofit 501(c) 3, organization assisting refugees and immigrants through the various stages of integration into U.S. society.



## 5A: Right to Language Assistance Notice

Submitted by: Customer Information Subcommittee  
Action Number: 5A  
Proposed date: 3/10/2009  
Adopted date: (per LEP Guideline Review Committee)

### PURPOSE

Identify areas where TriMet can provide notice of “right to language assistance,” at no cost, to LEP persons.

### PRACTICE

Title VI, Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons: In order to avoid discrimination on the grounds of national origin, the agency will take reasonable steps to ensure that Limited English Proficient (LEP) customers receive the language assistance necessary to allow them meaningful access to programs and services, free of charge.

### RESPONSIBILITY

Marketing and Customer Services

### APPROACH

In the future as in the past, this practice is guided by the outcome of the four-factor analysis whereby there is a review of:

1. The number and proportion of eligible LEP constituents;
2. The frequency of LEP individuals' contact with the program;
3. The nature and importance of the program; and
4. The resources available, including costs.

### PROCEDURE

Based on the four-factor analysis and LEP Advisory Committee recommendations, examples of LEP notification points to consider include venues likely to be patronized by a high volume of LEP customers looking for TriMet information:

1. TriMet customer service offices and ticket outlets
2. Signs and handouts available in vehicles and stations
3. Outreach documents
4. Agency website
5. Postings at Community Based Organizations (CBOs) partnering with the agency
6. Notices in non-English community newspapers
7. Announcements on non-English radio stations
8. Information tables at local events

## STATUS

Complete and ongoing

### Example of right to language assistance notice produced and posted

**TRIMET**  
See where it takes you.

**Spanish • Español**

**INFORMACIÓN SOBRE SERVICIOS DE INTERPRETACIÓN**

Si no habla inglés o si tiene algún impedimento de comunicación puede recibir servicios de interpretación gratuitos. Comuníquese a la persona que le está ayudando que necesita un intérprete.

**Vietnamese • Tiếng Việt**

**Thông Báo về dịch vụ      Thông dịch**  
nếu quý vị không nói tiếng Anh, hoặc nếu quý vị bị suy yếu về khả năng nghe và nói, quý vị có thể được cung cấp dịch vụ thông dịch miễn phí. Hãy nói với người đang giúp quý vị là mình cần một thông dịch viên.

**Russian • РУССКИЙ**

**Уведомление об      Услугах переводчиков**  
Услуги переводчика могут быть предоставлены вам бесплатно, если вы не говорите по-английски или имеете ограниченные возможности общения в связи со слуховыми или речевыми нарушениями. Собщите сотруднику центра обслуживания о том, что вам нужен переводчик.

**Chinese • 中文**

**口譯服務通知**  
如果您不講英語，或您有聽力、講話障礙，您可以得到為您提供的免費口譯服務。告訴幫助您的這個人您需要口譯員。

**Korean • 한국어**

**통역 서비스에 대한 통지**  
영어로 의사소통이 되지 않거나 청각 또는 언어 장애를 가지고 있는 분들에게는 무료로 통역 서비스를 제공하여 드립니다. 귀하를 돕고있는 사람에게 통역이 필요하다고 말씀하십시오.

**NOTICE OF INTERPRETATION SERVICES**

If you do not speak English, or if you have a hearing or speech impairment, you can have interpretation services provided for you at no charge. Tell the person helping you that you need an interpreter.

*Other languages are available on request.*



## **5B: Notice of Civil Rights Complaint Process**

Submitted by: Customer Information Subcommittee  
Action Number: 5B  
Proposed date: 3/10/2009  
Adopted date: (per LEP Guideline Review Committee)

### **PURPOSE**

Provide information in multiple languages about TriMet's complaint process.

### **PRACTICE**

TriMet's complaint process will be made available to LEP constituents upon request and in key public locations per Title VI.

### **RESPONSIBILITY**

Marketing, Customer Service, and Legal Services

### **APPROACH**

In the future as in the past, the determination as to Title VI notice locations and specific messaging formats is guided by application of the four factor analysis whereby there is a review of:

1. The number and proportion of eligible LEP constituents;
2. The frequency of LEP individuals' contact with the program;
3. The nature and importance of the program; and
4. The resources available, including costs.

### **PROCEDURE**

Based on the LEP Advisory Committee recommendations and the outcome of the four factor analysis the following locations were identified as the best places to post information about TriMet's complaint process for LEP persons:

1. TriMet's external website in key LEP languages.
2. The TriMet Ticket Office (TTO) in downtown Portland, Oregon, this is the location with significant numbers of LEP persons seeking TriMet information.
3. Onboard notification on transportation vehicles and transit centers.

### **STATUS**

Complete and ongoing

## Examples of materials created and posted

### TriMet Ticket Office (public space)

#### Plaques say: TriMet respects civil rights

*TriMet operates its programs without regard to race, color, religion, sex, sexual orientation, national origin, marital status, age or disability in accordance with Title VI of the Civil Rights Act, ORS Chapter 659A, or other applicable law. For more information contact*

503-238-RIDE (TTY 503-238-5811)



### Website

The screenshot shows the TriMet website homepage. The top navigation bar includes links for Fares, Maps & Schedules, Stops & Stations, How to Ride, and TriMet Store. Below the navigation is a large grey graphic of the TriMet logo. The main content area features a heading 'TriMet respects civil rights' with a detailed policy statement. To the right of the main content are three blue buttons for Trip Planner, Transit Tracker, and Service Alerts.

**TriMet respects civil rights**

TriMet operates its programs without regard to race, color, religion, sex, sexual orientation, national origin, marital status, age or disability in accordance with Title VI of the Civil Rights Act, ORS Chapter 659A or other applicable law. For more information contact 503-238-RIDE (TTY 503-238-5811) or email [administration@trimet.org](mailto:administration@trimet.org).

**TriMet Title VI Policy Statement**

Title VI of the Civil Rights Act of 1964 states:

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

TriMet is committed to complying with the requirements of Title VI in all of its federally funded programs and activities.

**Making a Title VI Complaint**

Any person who believes he or she has been aggrieved by an unlawful discriminatory practice under Title VI may file a complaint with TriMet. Any such complaint must be in writing and filed with TriMet within 180 days following the date of the alleged discriminatory occurrence. For information on how to file a complaint, contact TriMet by any of the methods provided below.

**Mail**

TriMet  
Martin Gonzalez  
Mail stop M12  
4012 SE 17th Ave.  
Portland, OR 97202

**Phone**

503-962-5813



## 5C: Customer Information Channels

Submitted by: Customer Information Subcommittee  
Action Number: 5C  
Proposed date: 3/10/09  
Adopted date: (per LEP Guideline Review Committee)

### PURPOSE

To provide information about TriMet services in multiple languages using the four-factor analysis to determine need.

### PRACTICE

TriMet's customer information will be made available to LEP customers through the most effective communication channels per Title VI, Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons: In order to avoid discrimination on the grounds of national origin, the agency will take reasonable steps to ensure that Limited English Proficient (LEP) customers receive information in the language necessary to allow them meaningful access to programs and services, free of charge.

### RESPONSIBILITY

Marketing and Customer Service

### APPROACH

In the future as in the past, the determination of the most meaningful and effective communication channel is guided by application of the four factor analysis whereby there is a review of:

1. The number and proportion of eligible LEP constituents;
2. The frequency of LEP individuals' contact with the program;
3. The nature and importance of the program; and
4. The resources available, including costs.

### PROCEDURE

The Project Manager, in concert with the LEP Coordinator, will make the final determination of what customer information will be translated based on the four factor analysis and recommendation of LEP Advisory Committee. Translations should be considered for these basic customer information materials:

1. How-to-Ride brochure including information about how to ride the system (bus, light rail, commuter rail and streetcar), fares, and basic riding rules.
2. Major service change Service Alerts.
3. Audio scripts for 238-RIDE menu selection to help limited English customers in receiving needed customer service.
4. Audio scripts for ticket vending machines (TVM) to assist LEP customers in purchasing tickets and passes.

## **INFORMATION CHANNELS**

The following information channels will be considered when determining which messages are to be prepared for LEP customers:

- Service alerts
- Print media-public notice and display ads
- Out-of-home media-transit ads, bus benches and shelters, bill boards
- Broadcast media-radio and TV
- Electronic media-website, email, blogs, etc.
- On street displays/posters
- In-person customer outreach

## **STATUS**

Completed and ongoing

### **Examples of materials created under this guideline**

- How-to-Ride in Spanish, *Viaje Mejor*
- How-to-Ride Brochure in 5 LEP languages
- Service change alerts printed in LEP languages by route changed
- Spanish-language “prompt” moved to front of Transit Tracker by Phone menu
- How-to-Ride video tapes updated with voice-overs for LEP languages
- Spanish Language bus benches
- Outreach to Spanish-speaking community at churches, local events, and community- based organizations (CBOs)



## **6A: Culturally-Competent Outreach**

Submitted by: Outreach Subcommittee

Action Number: 6A

Proposed date: 4/28/09

Adopted date: (per LEP Guideline Review Committee)

### **PURPOSE**

Develop and implement culturally-competent outreach to increase awareness of and access to TriMet services and programs.

### **PRACTICE**

Determine language needs of target audience to develop appropriate communication tools, approach and message.

### **RESPONSIBILITY**

LEP Outreach Coordinator-Marketing Department.

### **APPROACH**

The determination of the most meaningful, culturally-competent outreach measures will be guided by the outcome of the four factor analysis whereby there will be a review of:

1. The number and proportion of eligible LEP constituents;
2. The frequency of LEP individuals' contact with the program;
3. The nature and importance of the program; and
4. The resources available, including costs.

### **PROCEDURE**

Develop culturally appropriate materials in the target language.

1. Test materials with key constituencies.
2. Establish relationships and partner with key community leaders and organizations of target audience.
3. Individual one on one meetings, telephone calls, and e-mail messages to target leadership.
4. Visit/participate in scheduled community events of target audience to promote message.
5. Target outreach to key gathering places such as churches, schools, community colleges, libraries, and social service and community activist organizations.
6. Promote message with community media—create earned media opportunities.
7. Use TriMet vehicles and properties to display message in target language.
8. Develop print, radio, and television ads in target language.
9. Use TriMet personnel that reflect target audience to promote message.

### **STATUS**

Complete and ongoing

## **Example of work conducted as part of this effort**

### **CBO Focus Group Meetings**

The objective of CBO Focus Group Meetings is to pro-actively engage community key stakeholders to gain feedback and insight regarding culturally-competent accessibility to our programs and services. In this example, a meeting comprised of leaders from the Latino Community has convened to review the effectiveness of TriMet customer information materials and tools.



#### **Partial list of the organizations represented at this meeting**

- Latino Network
- Victory Outreach Community Services
- Centro Cultural of Washington County
- Ministerio Hispano—St Anthony Church
- Santos FC
- Programa Hispano
- Project UNICA
- Multnomah County Library-Latino Outreach
- MECHA
- Padres Hispanos Escuelas Pùblicas
- Instituto de los Mexicanos en el Exterior
- Centro Baltazar Ortiz
- Hacienda CDC
- Multnomah County SUN Schools



## **7A: Origin & Destination Survey (O/D)**

Submitted by: Research and Administration Subcommittee

Action Number: 7A

Proposed date: 3/10/09

Adopted date: (per LEP Guideline Review Committee)

### **PURPOSE**

To track the proportion of Spanish-speaking persons on the system and understand how their ability to speak and read English might impact their ability to fully access TriMet's programs and services.

### **PRACTICE**

TriMet will determine when changes in demographics, types of services, or other needs, warrant changes to the LEP plan or communication strategies.

### **RESPONSIBILITY**

Marketing Research

### **APPROACH**

This practice will be carried out as part of the TriMet O/D research program. In this program, all surveys are printed in English and Spanish. At the current time, O/D research is conducted as part of "Before and After" research associated with new service –primarily rail construction.

### **PROCEDURE**

Add language question to research surveys conducted in a language other than English. Using wording from the U.S. Census Bureau, determine LEP status of those responding to TriMet surveys.

- Q1. How well do you speak English? Very well, well, not well, not at all
- Q2. How well do you read English? Very well, well, not well, not at all

Consistent with standard LEP practices, anyone answering either question *not well* or *not at all* is considered LEP.

### **STATUS**

The language question was first asked of Spanish-speakers in 2006. The next O/D study will be conducted in spring of 2011 as part of the MAX Green Line MAX and WES "Before and After" research.



## 7B: LEP Plan Demonstration Program “After” Study

Submitted by: Research and Administration Subcommittee  
Action Number: 7B  
Proposed date: 3/10/09  
Adopted date: (per LEP Guideline Review Committee)

### PURPOSE

“After” study designed to determine effectiveness of the LEP demonstration program.

### PRACTICE

Based on the results of the research, TriMet will determine whether changes to the LEP Program are warranted.

### RESPONSIBILITY

Marketing Research and Marketing

### APPROACH

TriMet staff will collaborate to develop a culturally appropriate mix of **qualitative** and **quantitative** research methods to evaluate the effectiveness of this demonstration program.

### PROCEDURE

The “After” project will be based on the studies conducted “Before” program implementation and will include input from the general population, LEP community partners, LEP individuals, and TriMet personnel. Following is a list of program measures:

- 1. Internal Research**
  - a. Monthly program statistics including, number of travel trainings (group and individual), number of community events attended and estimated contact, number of new community partnerships and/or contacts made, monthly budget reconciliation
  - b. Employee awareness, understanding and compliance with the obligation of providing meaningful access to information and services for LEP persons.
- 2. External Research**
  - a. CBO Research
    - i. Awareness and approval of TriMet’s language assistance program elements.
    - ii. Evaluate appropriateness of language assistance program elements.
    - iii. Solicit ideas for improving/changing program to better meet LEP communities needs.
  - b. LEP Community Members:
    - i. Awareness and usage of TriMet LEP services including, Spanish web trip planning; 238-RIDE Spanish language trip planning; rider satisfaction
    - ii. Evaluation of communication tools (brochures, trip training, etc.); translation/interpretation services; TriMet staff support; and satisfaction with operator interface experiences.

Evaluations to begin spring 2011.



## 7C: LEP Plan Monitoring

Submitted by: Research and Administration Subcommittee

Action Number: 7C

Proposed date: 3/10/09

Adopted date: (per LEP Guideline Review Committee)

### PURPOSE

Develop a process to monitor the effectiveness of TriMet's LEP Access Plan on an ongoing basis.

### PRACTICE

TriMet will determine when changes in demographics, types of services, or other needs, warrant changes to the LEP plan.

### RESPONSIBILITY

Marketing Research

### APPROACH

This approach will use a combination of qualitative and quantitative approaches to determine if the LEP Plan is meeting the needs of the LEP community.

### PROCEDURE

Regular LEP Plan reviews will be conducted to make sure the LEP Plan continues to include reasonable steps to ensure meaningful access to TriMet's programs and services for LEP communities. Monitoring the LEP program will take two forms:

1. **Ongoing Review:** This would be an ongoing process conducted internally and externally throughout the year. Feedback solicited and received from: TriMet staff (front line and management/administration), LEP customers, and CBOs serving the LEP populations. In this way, any **critical issues can be immediately addressed** and changes made to the LEP Access Plan as needed.
  - a. Internal: Meet with TriMet staff to evaluate the quantity and quality of LEP activities encountered between TriMet staff and LEP customers. Staff will be asked to evaluate the effectiveness of LEP communication methods, materials, and messaging. At all times, suggestions for improvements will be requested and acted upon as appropriate.
  - b. Front Line Surveys: This will be a quantitative survey conducted among front line staff to track any changes in quantity and quality of LEP customer encounters. Survey questions will include: awareness and use of TriMet's language assistance services; frequency of LEP customer encounters, how they communicate with LEP passengers; what the agency could do to them them.
  - c. External: Meet with LEP customers and CBO representatives to find out how well elements of the LEP communications are working. This part of the review will rely on the CBOs and FBOs serving the Spanish-speaking LEP population. In addition, organizations serving diverse immigrant populations will be included to keep current with needs of new language groups moving into the area.

2. **Annual Review:** For the first five years of the LEP Access Plan, an annual reevaluation of the LEP plan will take place. Included in the review would be the results of any changes in demographics, types of services, or other needs. The annual review includes:
  - a. A Four-Factor Analysis: to gather internal and external program data, analyze results, and report on the status of the program in light of updated information.
  - b. Round Table Discussions: Conducted with members of the LEP communities to determine how well the agency is working for them and to track any changes due to implementation of the LEP Plan actions. The discussions will focus on:
    - c. Awareness of and use of TriMet's language assistance services
    - d. Experiences with TriMet's fares/tickets, routes/schedules, and safety/security issues
    - e. Understanding and evaluation of customer information materials – visual, auditory, and written
    - f. Suggestions to make riding TriMet easier

At the end of the five year period, the frequency of reevaluation of the LEP Plan will be based on agency staff review of whether "demographics, services, and needs" remain constant.

## **STATUS**

The first annual review is scheduled for spring 2011.

## **LEP Education**

### **LEP Resource Guide**

The TriMet Employee LEP Resource Guide is made available to employees for their review and preparation for the possibility of working with LEP community members. The guide is available through the agency website – TriNET, the Employee Orientation Handbook/Training, employee publications, and employee bulletin boards located throughout the agency.

## **LEP RESOURCE GUIDE**

### **LEP Access Plan Summary**

#### **Definition**

Limited English Proficient means that English is not the primary language; with limited ability to read, speak, write or understand English. LEP populations in our region include Spanish, Vietnamese, Russian, Chinese and Korean.

#### **Four Factor Analysis**

1. Number or proportion of LEP persons encountered
2. Frequency of contact
3. Nature and importance of the program, activity or service
4. Resources available, and associated costs, to recipient

#### **LEP Access Guidelines (W/Global/LEP ACCESS PLAN)**

- Language Assistance
- Vital Documents
- Training
- Definitions and Standards
- Customer Information
- Outreach
- Research and Administration

### **LEP Assistance**

#### **Assistance to LEP Customers in the Field**

- (503) 238-RIDE (Provides access to interpreters)
- *trimet.org* (webpage content in Spanish, Vietnamese, Russian, Korean, and Chinese plus trip planner in Spanish)
- TVM Spanish language prompt

#### **TriMet Resources Available to Help You Improve Communication with LEP Customers**

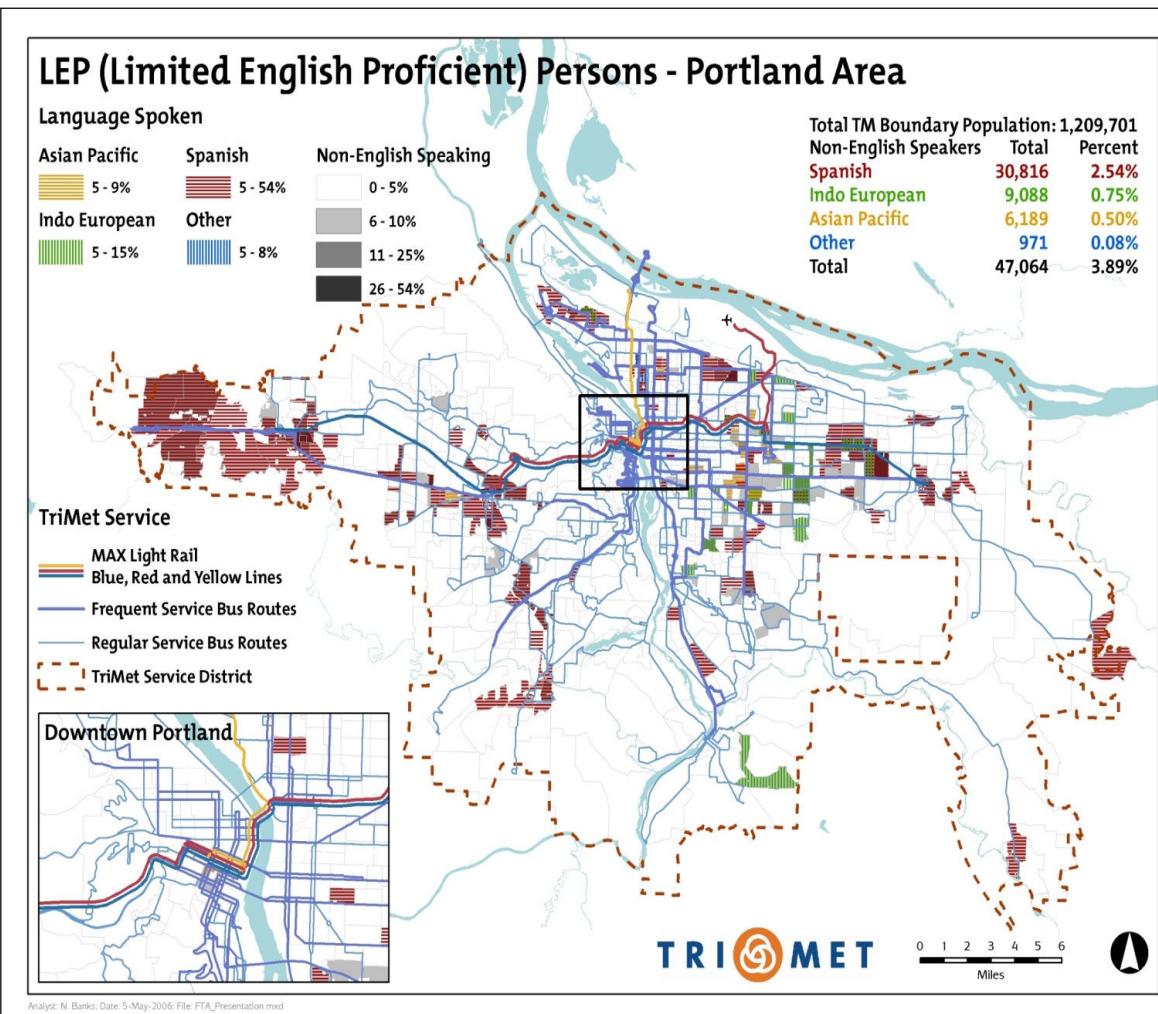
- Program assessment: LEP Outreach Coordinator
- LEP how to ride materials: Marketing Department
- Written translations: Creative Services Manager
- Telephone language interpretation: Customer Service Manager
- Outreach: LEP Outreach Coordinator

#### **Title VI Civil Rights Complaints**

**Contact:** LEP Outreach Coordinator



LEP Resource Guide (Continued)

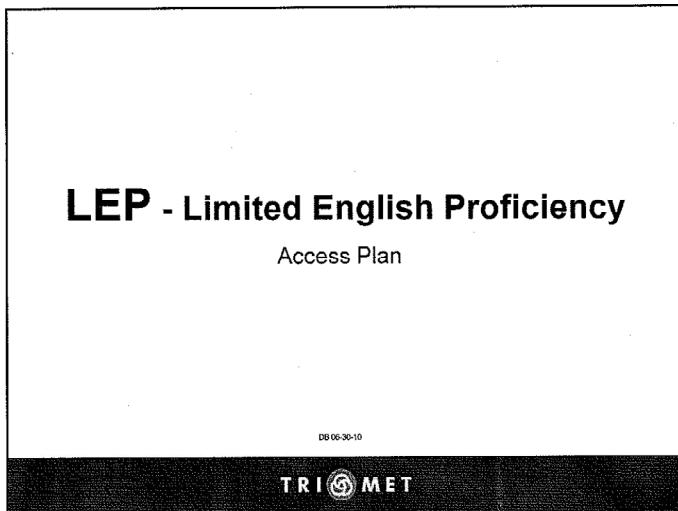


Source: 2000 Decennial Census and TriMet GIS Mapping



## LEP Orientation PowerPoint

It is the agency's intention to present the LEP Access Plan to all departments to ensure that all TriMet employees are aware of the LEP Plan, TriMet's language assistance services, and are able to appropriately interact with LEP community members.



**Limited English Proficiency (LEP)** means that English is not the primary language; with limited ability to read, speak, write or understand English

# LEP

Access Plan

## Agenda

- Summary Review
- Work Plan Update
- Program Implementation



Our agenda today has three parts.

In a **Summary Review**, we'll share the background on TriMet's commitment to develop and implement a meaningful LEP Plan to ensure meaningful access for our riders and customers that have Limited English Proficiency. And we'll cover our work completed thus far, including the overall construct of the Plan and our key Guidelines, approved by the GM.

Then we'll share the **status of the LEP Work Plan**, with an update on our progress, for the benefit of this region's LEP Community, and as part of our support for a National Toolkit.

And finally, we'll discuss steps for a successful **implementation** of the LEP Work Plan agency-wide, by ensuring a broad, consistent application of the plan. Beginning with this meeting, we'll launch an effort to gain agency-wide awareness of the plan, discuss how we'll activate it and provide information and access to the tools and services of the plan.

## LEP

Access Plan

### History

- **Title VI of the Civil Rights Act of 1964 –**
  - “No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance.”
- **Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency**
  - “...each Federal agency examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services.”

TRI MET

First a little history, The LEP movement comes directly out of the civil rights movement --

### **Title VI of the Civil Rights Act of 1964**

*“No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. The Supreme Court, in Lau v. Nichols, 414 U.S. 563 (1974), interpreted Title VI regulations promulgated by the former Department of Health, Education, and Welfare to hold that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination.*

**Executive Order 13166, “Improving Access to Services for Persons with Limited English Proficiency,” Signed by President Clinton in August of 2000 and directs each Federal agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.**

**LEP**  
Access Plan

LEP Needs Analysis & Plan- 2005

- Established 4% of population in TriMet service district as LEP
  - Spanish 65%
  - Vietnamese 11%
  - Russian 9%
  - Chinese 6%
  - Korean 4%
- Examined the existing LEP services offered by TriMet
- Recommended new areas of focus
- Developed a language access plan to serve LEP customers

TRI MET

Going back to 2005

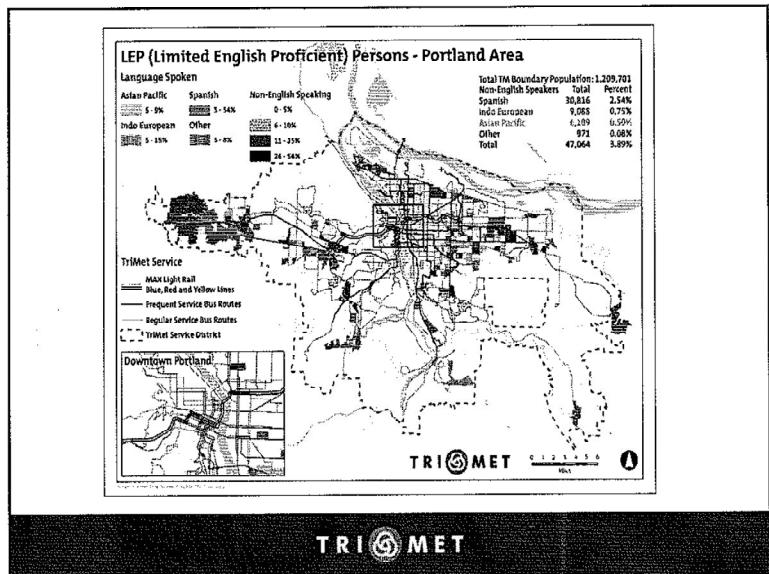
The U.S. Department of Transportation published revised LEP guidance for its recipients on December 15, 2005 which helps agencies develop LEP implementation plans consistent with the provisions of Section VII of the DOT LEP guidance.

Following DOT guidance, TriMet analyzed population data to establish that roughly 4% of the population in the TriMet service district is LEP. The LEP population is comprised of:

- Spanish - 65%
- Vietnamese – 11%
- Russian – 9%
- Chinese - 6%
- Korean – 4%

Next TriMet set out to:

- Examine the existing LEP services offered by TriMet
- Recommend new areas of focus
- Develop a language access plan to serve LEP customers



This map created through our G.I.S. department takes LEP census data and overlays that with our bus and MAX service.

## LEP

Access Plan

LEP Advisory Committee convened by the General Manager, June 2008

- To review/guide the agency's LEP work plan
- To determine if LEP population has full and meaningful access to TriMet services
- To report findings to management with recommendations for compliance with federal regulations



In 2008, TriMet's General Manager convened an LEP Advisory Committee to review and guide the implementation of the Agency's LEP Access Plan.

The \$500,000 FTA/Civil Rights Division grant was awarded to TriMet to create a national outreach and accessibility model for serving LEP communities.

When we make the system better for any stakeholder group, it generally makes it better for everyone.



This was a familiar mantra by former General Manager, Fred Hansen. By better serving the LEP community we serve everyone better. For our LEP riders, we will improve access to information and services by making things simpler to understand.

Making things simpler is better for everyone.

Examples – CAT/ Automatic Stop Announcements; Signage to improve contrast, glare, font size

# LEP

Access Plan

## Four Factor Analysis

- Number or proportion of LEP persons encountered
- Frequency of contact
- Nature and importance of the program, activity or service
- Resources available to recipient (and associated costs)

TRI MET

For all of the work plan categories, we consider these **Four Factors** the critical guide and filters in our decisions regarding LEP priority focus. Of the Region's 4% LEP population,

- 65% are Spanish, followed distantly by
- Vietnamese at 11%
- Russian at 9%
- Chinese at 6%
- Korean at 4%
- Other at 5% combined

Our program has focused primarily on the largest LEP population in our region, the **Spanish-speaking community**. Yet, our How to Ride information is provided in six languages (English, Spanish, Vietnamese, Russian, Chinese and Korean) and major service event information is often provided in several languages.

## LEP

Advisory Committee

### LEP Access Guidelines

- 1 Language Assistance
- 2 Vital Documents
- 3 Training
- 4 Definitions and Standards
- 5 Customer Information
- 6 Outreach
- 7 Research and Administration



After a set of initial Advisory Committee orientation meetings, as a key step toward effectively moving the process forward, a Guidelines Review subcommittee was formed out of the broader advisory committee, to develop **guidelines** (policies and procedures) for the 7 key categories identified in the LEP work plan:

1. Language Assistance - To provide notice of the right to language assistance on key non-vital documents (fact sheets, open house materials)
2. Vital Documents – To determine which documents are vital for translation (like applications and consent forms)
3. Training – To prepare front line and staff for engaging and responding to LEP customers
4. Definitions and Standards – To ensure consistency in the application of competency standards for interpreters and translators.
5. Customer Information – To provide timely, relevant information about TriMet programs and services.
6. Outreach – To conduct culturally-competent outreach to increase awareness and access to TriMet services
7. Research and Administration – To assess and monitor effectiveness of TriMet's LEP Plan

**Limited English Proficiency Access Guidelines**

**5 . Customer Information**

Determine appropriate information channels and use of language and/or symbols, to:

- Provide information about the right to language assistance.
- Provide information about TriMet's complaint process.
- Provide information about TriMet's services.



For Customer Information, perhaps the most visible of the LEP Plan elements, the channels to consider include:

- Collateral – Service Alerts
- Print Media – Public notice and Display Ads
- Out-of-Home Media – Transit Advertising, billboards
- Broadcast media – Radio and TV
- Electronic Media – Website, email, blogs, Twitter, Facebook
- Onstreet – Displays/Posters
- Outreach – Meetings, Events, Face to Face



#### On Street

Many of our customer information messages about service, including how to ride information and rules for riding, are also availed in Spanish. In this case, a broad campaign that is featured at stations and stops, on vehicles, in our print materials and online, is our Respect the Ride campaign. Here is a case where the campaign theme translates directly as culturally competent.



### Signage

When WES trains began testing, we began our **safety campaign**, featuring the words **Stop. Look. Listen.** Again, the message is clear, and the words translate directly.



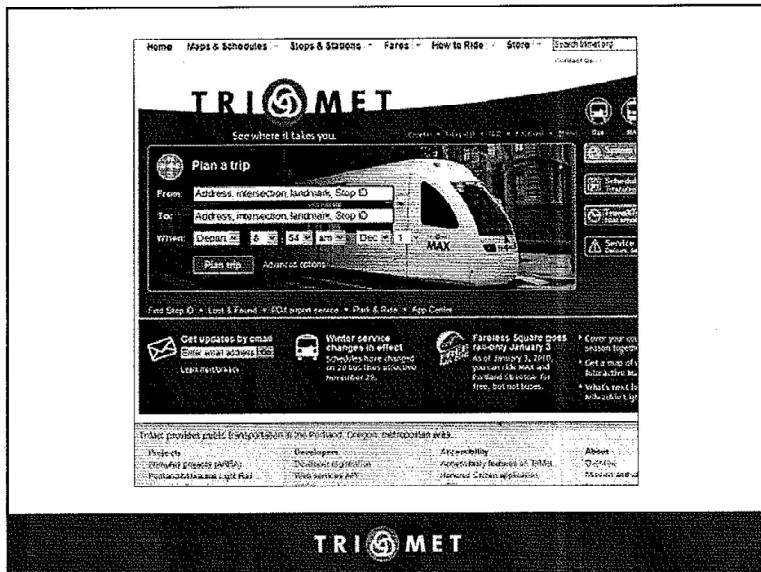
#### Promotional Material

The theme for promoting the Green Line, Green Means Go, was problematic so a more culturally appropriate version was created – *Travel on the Green Line*.



#### Printed Service Material

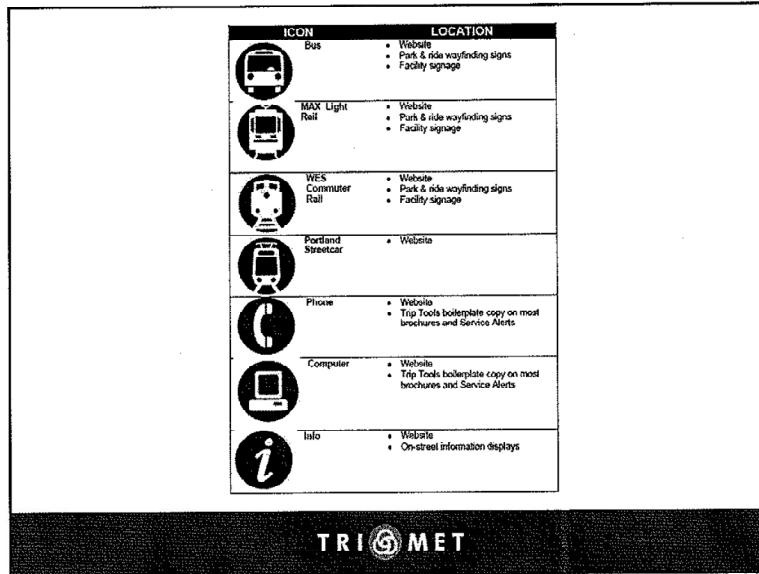
"How to Ride" is more effective as "Ride Better," in a style that is also more culturally appropriate.



***trimet.org* – the agency's website features:**

**How to Ride** information in English, Spanish, Russian, Chinese, Korean and Vietnamese

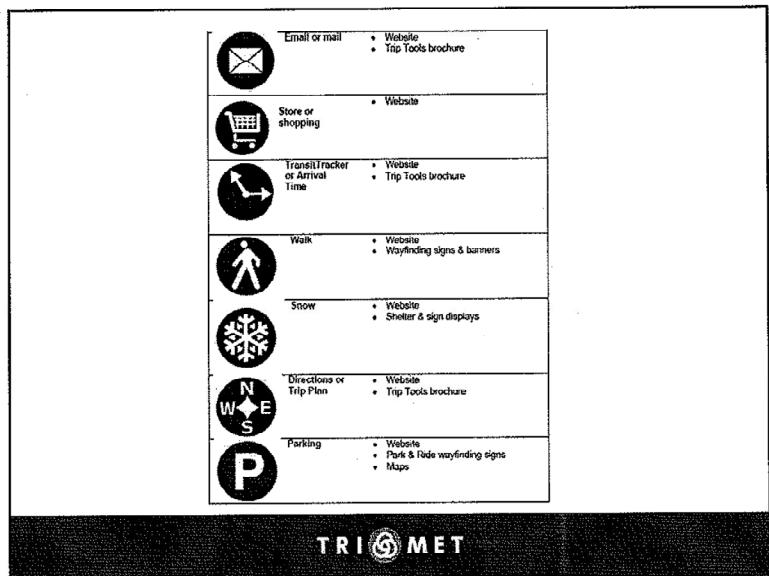
**Trip Planner** access in English and Spanish

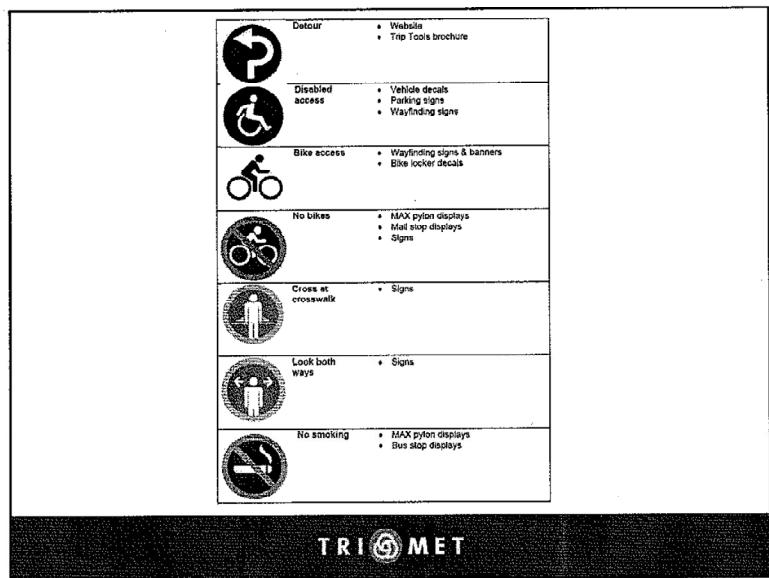


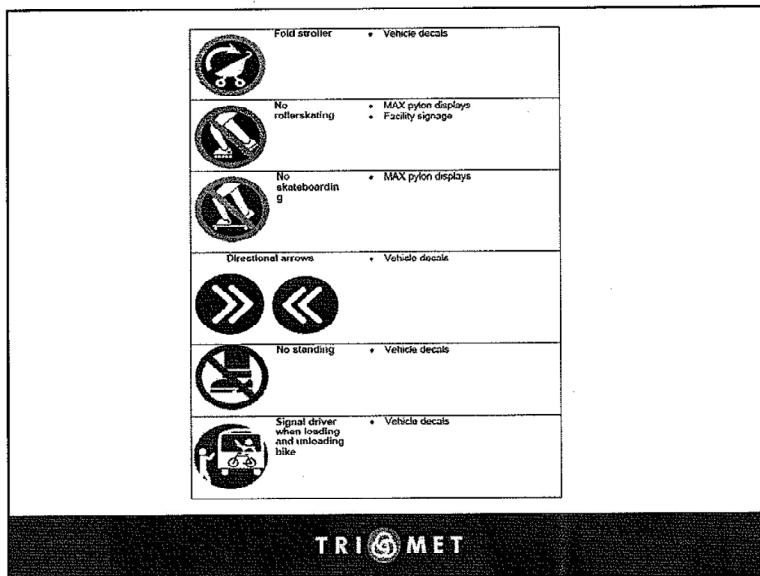
### Icons and Symbols

Our General Manager has challenged us to simplify our messages by incorporating icons and symbols to universally communicate messages versus expanding messages with a wallpaper of words in different languages.

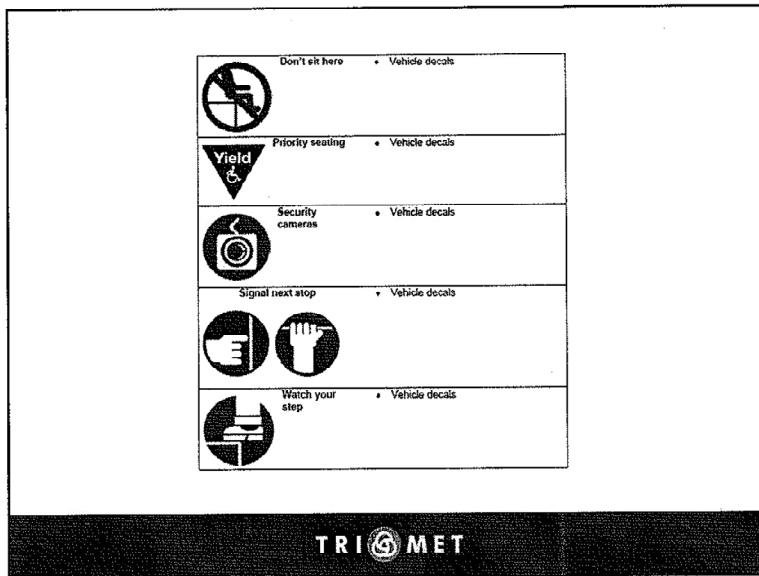
So we've created a considerable inventory of iconography to communicate with our broad and diverse audiences. Some of these represent **universal symbols**. Some are created for our specific circumstances and testing becomes an integral part of this evolutionary process to ensure our customers understand the symbols to mean what we intended.







TRI MET



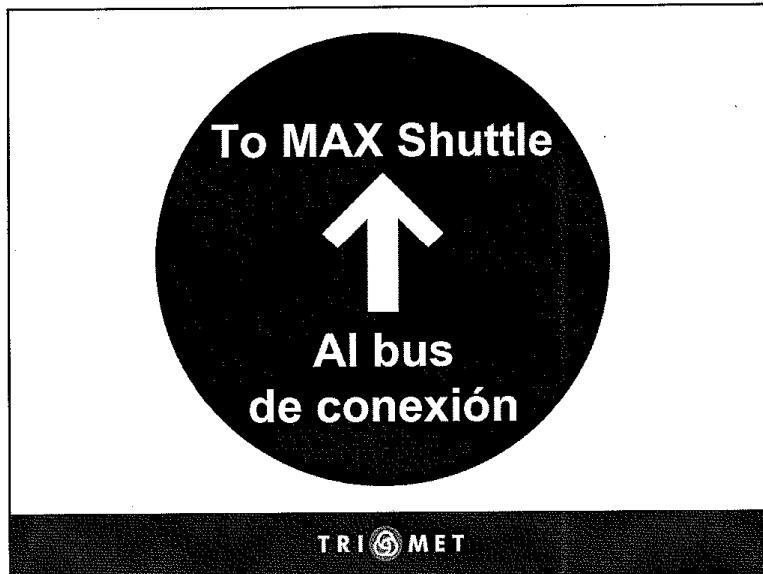
20



Some are as **simple** as a MAX train symbol and an arrow to direct people to the train's location.

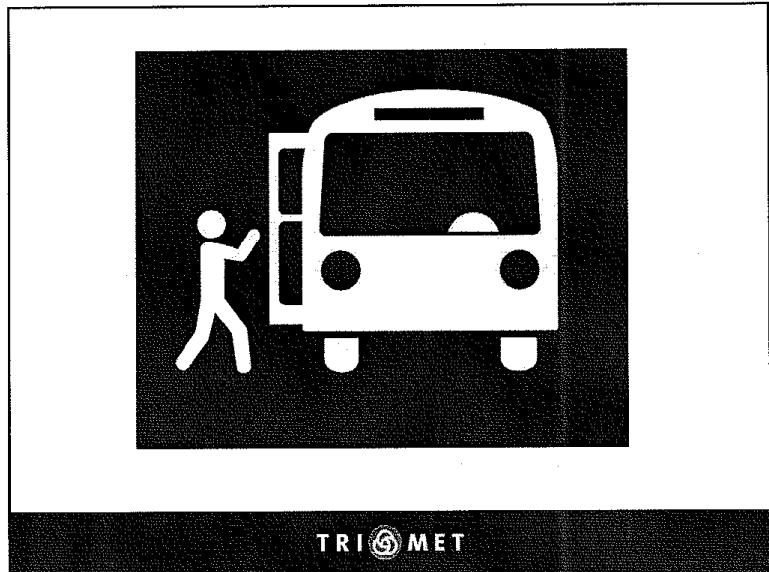


Hopefully people take this to mean “walk your bike” rather than “get on your bike backwards”



In some cases, we think we've raised the bar by being clever with slip-resistant sign decals that direct riders to, in this case, a temporary MAX shuttle stop. But we realized that the words MAX Shuttle may not be immediately understood by a Spanish-speaking LEP audience. So we adjusted the words in spanish to read "bus connection".

But even this wasn't as effective as it might be, as the General Manager again reminded us. So we created an improved iteration. And this kind of challenging, and testing, will continue as an important part of our commitment to improving access, through our communication.



This improved version of the sign in the previous slide is purely iconic, and hopefully sends the message to “board the bus” here. We use this type of sign (with directional arrows) in our way finding family at Clackamas Town Center, for riders coming off the train, heading to catch their bus.

When practical, for simple messages, a “picture” is a better communication device than using multiple words to provide instructions in multiple languages, because it can be more efficient, and more quickly and universally understood.

**Limited English Proficiency Access Guidelines**

**6 . Outreach**

- Develop and implement culturally competent outreach to increase awareness of, and access to, TriMet services.



Pro-active engagement is critical to developing and maintaining relationships with community leaders and stakeholders, to create awareness, gain input (and insight) and to solicit feedback.

## Outreach



Partial list of the organizations represented at the focus group

Latino Network  
Victory Outreach Community Services  
Centro Cultural of Washington County  
Ministerio Hispano—St Anthony Church  
Santos FC  
Programa Hispano  
Project UNICA  
Multnomah County Library—Latino Outreach  
MEChA  
Padres Hispanos Escuelas Públicas  
Instituto de los Mexicanos en el Exterior  
Centro Baltazar Ortiz  
Hacienda CDC  
Multnomah County SUN Schools

TRI MET

## Outreach

The objective is to pro-actively engage community key stakeholders to gain feedback and insight regarding culturally-competent accessibility to our programs and services. In this example, we're facilitating a focus group comprised of leaders from the Latino Community to review effectiveness of TriMet customer information materials and tools.

## LEP

Access Plan

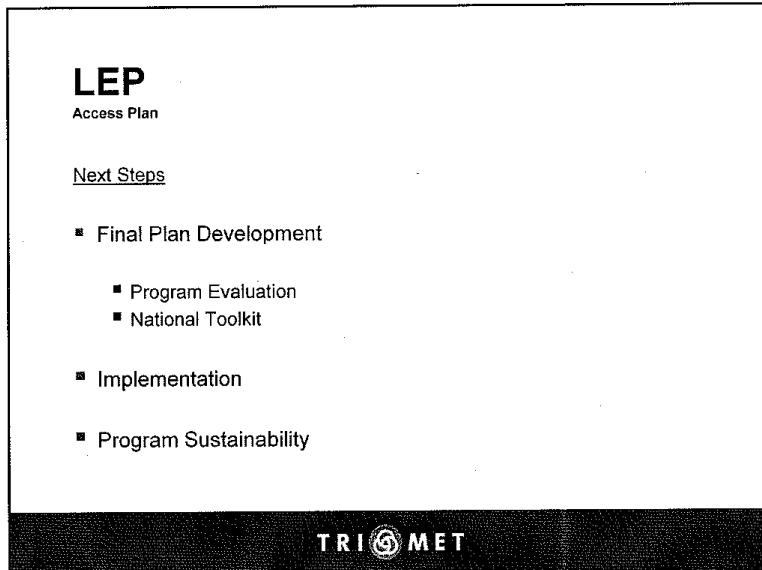
### Activities To Date

- Continuing successful programs such as telephone interpreters and multi-lingual trip planning for LEP customers
- Continued printing of the *How to Ride* brochure in multiple languages
- Received FTA grant to hire LEP Coordinator and develop LEP Program at TriMet
- Revamped Spanish languages pages on [trimet.org](http://trimet.org) to improve trip planning options for LEP customers
- Moved Spanish "prompt" to first place on Transit Tracker by Phone



### Just a few of the activities we are engaged in:

- Continuing with the Multi-lingual telephone interpreters on 238-RIDE – We have been doing this for nearly 20 years
- Continue with media outreach and materials printed in a variety of languages
- Redesigned the Spanish-language website to improve Trip Planning options for LEP customers
- Received a \$500,000 FTA grant to hire LEP Coordinator and develop LEP Program at TriMet
- Revamped Spanish languages pages on [trimet.org](http://trimet.org) to improve trip planning options for LEP customers
- Moved Spanish "prompt" to first place on Transit Tracker by Phone



This FTA Grant continues through FY 11 and the work continues beyond that. In the meantime, our priorities include:

**Program Evaluation**

The post-research -Compare what we said we'd do with what we've done; Rely on more Community feedback; Continue building on the foundational research done so far – pre-work

**National Toolkit**

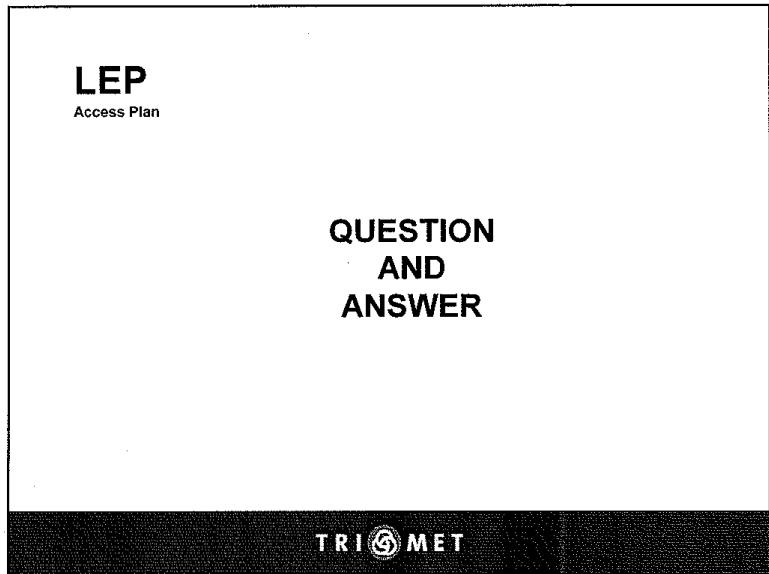
The FTA looks to TriMet as the model for other agencies. We will have a construct that the FTA can incorporate into their National Toolkit or to serve as the basis for a National Toolkit for how to provide meaningful access for LEP populations.

We are now at the point where we can begin to activate our LEP Plan agency-wide by communicating the plan objectives, guidelines and process across TriMet, by department, with tools (including SOPs and checklists) to ensure broad, consistent implementation.

**Program Sustainability**

With fully developed guidelines and practices for all access categories, we can now create awareness of the LEP Plan and activate it multi-divisionally, to ensure the LEP program becomes visible and relevant agency-wide, such that it is recognized and regarded as part of the **TriMet Way**.

This is where you come in. The Four Factor Analysis should be considered for all customer-related activities, services, programs at TriMet. They are important filters to guide our decisions, much like our four brand values.



**Any questions?**

All of the LEP plan elements can be found on TriNet, on the Marketing home page.

## V. LEP Access Plan: Progress Summary

### Major Milestones

1. Funding: In 2006, TriMet received grant funding from the FTA Civil Rights Division to develop and implement a demonstration program for its LEP plan. The Spanish-speaking LEP population is the largest LEP community (65%) in the region, thus they were chosen for the demonstration program. TriMet's LEP initiatives undertaken since grant funding continue to guide the agency's work for non-English and English speakers as well.
2. In September 2007, TriMet hired one full-time LEP coordinator and dedicated resources to provide project management for the LEP demonstration program. The LEP coordinator provides community outreach to LEP customers, training for LEP customers, and assists in the development of policies and procedures to effectively meet the needs of LEP persons. The LEP coordinator assesses staff resources for translation/interpretation services and develops applicable criteria and standards.
3. In June 2008 TriMet's General Manager formed a multi-divisional LEP Advisory Committee to assist in the task of identifying and implementing LEP measures to further the agency's effectiveness in providing meaningful access to LEP customers. The LEP advisory committee, led by TriMet's Marketing Director, worked on developing guidelines in the following areas:
  - Language assistance
  - Vital documents
  - Training
  - Definitions and standards
  - Customer information
  - Outreach
  - Research and administration

### Demonstration Program Updates

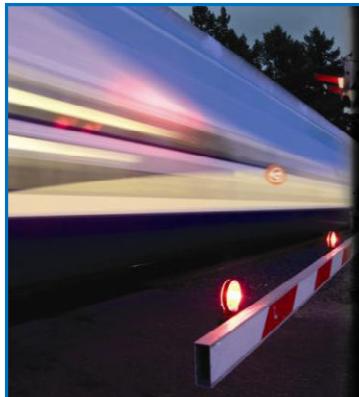
1. The demonstration program focused its outreach efforts and targeted language assistance efforts on development of culturally appropriate materials for Spanish-speaking LEP customers.
2. When it comes to issues related to fare changes, capital projects, and new service – LEP outreach and language assistance has been provided Vietnamese, Russian, Chinese, and Korean LEPs as well as Spanish-speaking LEP persons.
3. The demonstration program convened key community leaders working with Spanish-speaking LEP constituents to review TriMet information pieces, icons and technology offerings to determine usefulness to LEP populations. As a result of the input and continued involvement of the group as "community advisors," major improvements were made to printed materials, web page content, and customer service telephone assistance.
4. In October 2008 the LEP demonstration program produced a graphic "novella" entitled *ViajeMejor* (Travel Better), which provides native Spanish-speakers an engaging and informative orientation to the TriMet transit system. This is an example of delivering vital information to LEP customers in a culturally appropriate format. Development of the

information piece included testing the content with LEP riders and making improvements before it was finalized.

5. TriMet's web page contains links to information in Spanish, Vietnamese, Russian, Chinese, and Korean. In addition, the landing page for Spanish now contains a Trip Planner en español.
6. Spanish speakers can also access TransitTracker (real-time arrival information) en español by calling 503-238-RIDE thereby accessing real time information on the next train or bus arrival. The Spanish "prompt" was moved to first place on the menu.
7. All LEP customers can access language assistance by calling 503-238-RIDE.
8. The demonstration program included development of working partnerships with key community organizations to incorporate the use of TriMet LEP oriented materials in travel training sessions (Centro Cultural, El Programa Hispano, and IRCO).
9. The opening of Westside Express Service (WES) commuter rail, and the MAX Green Line provided an opportunity to do targeted outreach to LEP communities on the new service. The demonstration program supported the development of an integrated campaign to promote the new service and safety along the new rail lines. To promote the new Green Line TriMet placed newspaper, radio and TV ads in media dedicated to the Spanish-speaking community. Bus bench ads in Spanish were also placed along the rail alignment.
10. The demonstration program also developed channel cards in Spanish for placement on all TriMet vehicles that communicate vital customer information for the following: Fare requirements, availability of TriMet customer assistance in Spanish, and the rules for riding.
11. As of July 2010, an agency-wide staff orientation program was implemented to inform agency staff about the work done by the LEP advisory committee and the resources available within TriMet to provide better access to LEP customers. TriMet's Marketing Director, LEP coordinator, and LEP advisory committee members from TriMet's operation and capital projects departments are leading this effort. The advisory committee's power point presentation, minutes, and proposed guidelines are posted internally in TriNet and can be accessed by all agency staff.
12. Upcoming LEP activities include finalizing TriMet's —*How to Ride* video in each of the identified LEP target languages. These videos will be posted on TriMet's website, and DVD copies will be distributed to CBOs working with LEP communities. Copies will also be shared with public libraries, schools, the health department, and workforce development centers.
13. TriMet provides notice to the public regarding its Title VI obligations and has notified the public regarding TriMet's obligations to provide programs and services without regard to race, color or national origin. TriMet disseminates notice of its Title VI obligations and the right to file a Title VI complaint through the agency's website, onboard notification on all transportation vehicles, transit centers, and TriMet's downtown customer assistance office where passes and tickets are sold.
14. All public notifications are in English and translated into the five LEP languages (Spanish, Vietnamese, Russian, Chinese, and Korean).

## LEP Program Material Examples





## PARE. VEA. ESCUCHE.

El tren de pasajeros WES está operando ahora.  
SIEMPRE PUEDE VENIR UN TREN.



TRIMET

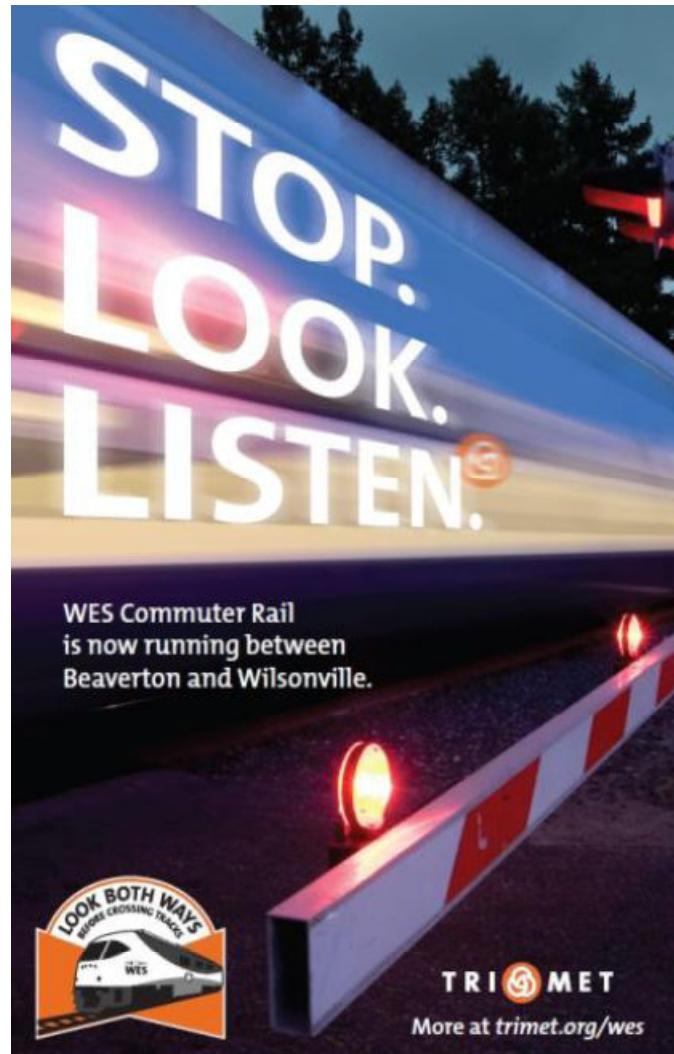


Los trenes no te  
pueden esquivar.



TRIMET

Más información en  
[trimet.org/wes](http://trimet.org/wes)



TRIMET

More at [trimet.org/wes](http://trimet.org/wes)

## RESPECT THE RIDE.

- Valid and correct fare is required.
- Move for seniors and people with disabilities.
- Don't threaten or intimidate riders or operators.
- Don't be so loud that you disturb others.
- Don't block the aisles or doors.
- If you bring a pet, keep it in a carrier.
- Keep food and drinks in closed containers.



trimet.org • 503-238-RIDE

MAXIMUM PENALTY: \$250/EXCLUSION • TMC 28-29 • trimet.org/rules



## RESPETE EL VIAJE.

- Tener boleto o comprobante de pago.
- Cederle el asiento a los ancianos y a las personas con dificultades físicas.
- No amenazar o intimidar a otros pasajeros u operadores.
- No hacer ruidos que molesten a los demás.
- No bloquear las puertas ni los pasillos.
- Llevar animales en un portador.
- Mantener comidas y bebidas en recipientes cerrados.



trimet.org/espanol • 503-238-7433

Penalidad máxima: \$250 o exclusión del sistema • Código TriMet Capítulos 28-29



## **VI. APPENDIX**

1. LEP Workgroup Work Plan
2. Four Factor Detail
3. LEP Planning: Tasks & Responsibilities Checklist

## 1: LEP Workgroup Work Plan

LEP WORKGROUP WORK PLAN: 2005-2006	
MEETING	TEAM ASSIGNMENT
<b>Meeting 1: WORK TASKS</b>	<b>June 16, 2005</b>
GM kickoff workgroup Overview of goals	General Manager Ex. Dir. Of Marketing
Overview of work plan Discuss information to gather for next meeting	Mgr, Diversity & Transit Equity (DTE)
<b>Meeting 2: NEEDS ASSESSMENT</b>	<b>June 24, 2005</b>
Identify non-English languages spoken within service area	Geographic Information Systems (GIS)
Identify high concentrations of LEPs within service district	GIS
<u>List TriMet core services:</u>	
Transportation Services (JARC, LIFT, bus, existing and future light rail)	Customer Service, Service Planning, Creative Services, Capital Projects, GIS, Customer Information
Programs supporting transportation services: * Jobs * Signage * Informational/written promotional materials	Development and Publication (IDP), Bus Operations
Internet Interaction with TM personnel 238-RIDE Assess the usage of TM services by LEP customers	Customer Service, Creative Services, Service Planning, Capital Projects, GIS, IDP
<b>Meeting 3: ASSESSING SERVICE USAGE</b>	<b>July 7, 2005</b>
Assess the usage of TM services by LEP customers	Customer Service, Creative Services, Service Planning, Capital Projects, GIS, IDP
Examine transportation planning assessment of LEPs	Service Planning, Capital Projects, Marketing, GIS
Prioritize core services and identify core populations by density	Full Team
<b>FULL TEAM:</b> Bus Operations, Capital Projects, Creative Services, Customer Services, Diversity & Transit Equity (DTE), Geographic Information Systems (GIS), Customer Information Development and Publication (IDP), Human Resources, Legal Services, Marketing Research, Service Planning	
<b>CO-CHAIRS:</b> Ex. Director of Marketing, Manager DTE	

<b>LEP WORKGROUP WORK PLAN: 2005-2006</b>	
<b>MEETING</b>	<b>TEAM ASSIGNMENT</b>
<b>Meeting 4: ASSESSING METHODOLOGY</b>	<b>July 27, 2005</b>
Recap priority list of core services and core populations	Full Team
Define/draft questions to determine: If people can access core services Notification of language services	Creative Services, Customer Services
Staff training	Human Resources
Examine resources available for language assistance program	Marketing, Customer Services, Creative Services, Capital Projects
Discuss focus group/roundtable methodology for reaching communities to solicit feedback on appropriate language services	DTE, Marketing Research
<b>Meeting 5: RESEARCH REVIEW</b>	<b>January 19, 2006</b>
Discuss focus group/roundtable results	Marketing Research
Assess any barriers to communications by LEP individuals	Full Team
Assess how well LEP individuals' access services relative to English-proficient communities	Full Team
<b>Meeting 6: LEP PLAN FRAMEWORK</b>	<b>May 2006</b>
Written summary of the results of the needs assessment	DTE
Identify tools/language resources to meet LEP Program needs: Bilingual TM staff Professional interpreters on contract Translators	Human Resources, Creative Services, Marketing, Bus Operations
Policies and procedures for identifying/assessing the needs of LEPs	Full Team
<b>Meeting 7: WRAPPING UP</b>	<b>June 1, 2006</b>
Draft framework for LEP plan	DTE
Draft framework for monitoring program	DTE
Written summary of actions taken and tools used to provide access to LEPs	DTE
Draft implementation recommendations, compliance measures and timeline	DTE

## 2. Four Factor Detail

### Factor 1: The number and proportion of LEP persons served

#### Methodology

To conduct Factor 1, the LEP Workgroup sought **quantitative** and **qualitative** information regarding LEP populations from the following sources:

#### Quantitative

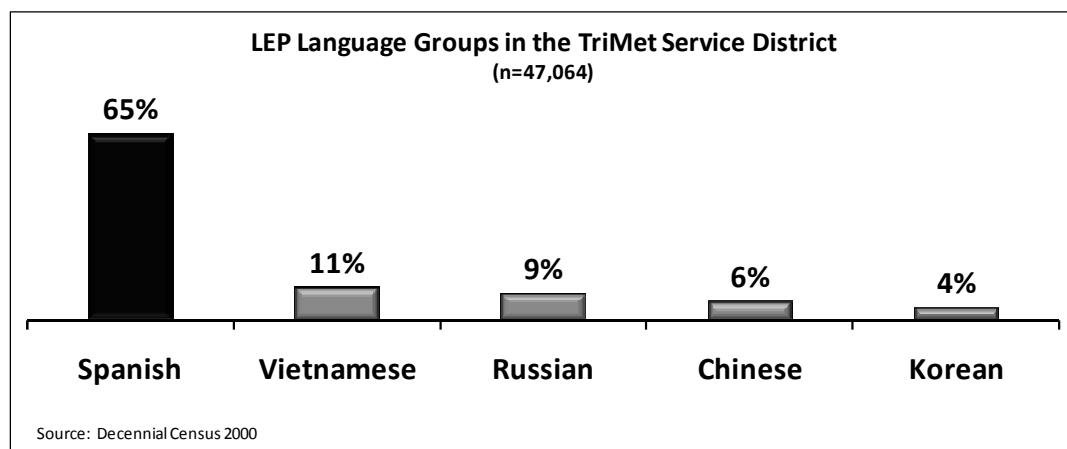
1. Pulled the TriMet service boundaries.
2. Retrieved data from the *2000 Decennial Census, Modern Language Association, and Geographic Information Systems (GIS)* mapping technology.
3. Analyzed census findings and determined “LEP eligible” <sup>12</sup> populations in accordance with DOT guidelines.
4. Produced regional map showing TriMet service boundaries, LEP concentrations, and TriMet bus and rail service overlay.
5. Other sources of population data considered for use included LEP data from school districts within the TriMet boundaries. However, given the robust set of regional population data derived from the Census coupled with the feedback from area service agencies, the workgroup deemed that the data used was sufficient for the tasks at hand.

#### Qualitative

1. Examined prior experiences with LEP individuals – Factors 2 and 3 addressed this portion of the analysis.
2. Identified Community Based Organizations (CBOs), Faith Based Organizations (FBOs), immigrant and refugee organizations, and health and county services.
3. Contacted relevant community organizations and discussed status of immigrant/LEP populations in the region.

#### Findings

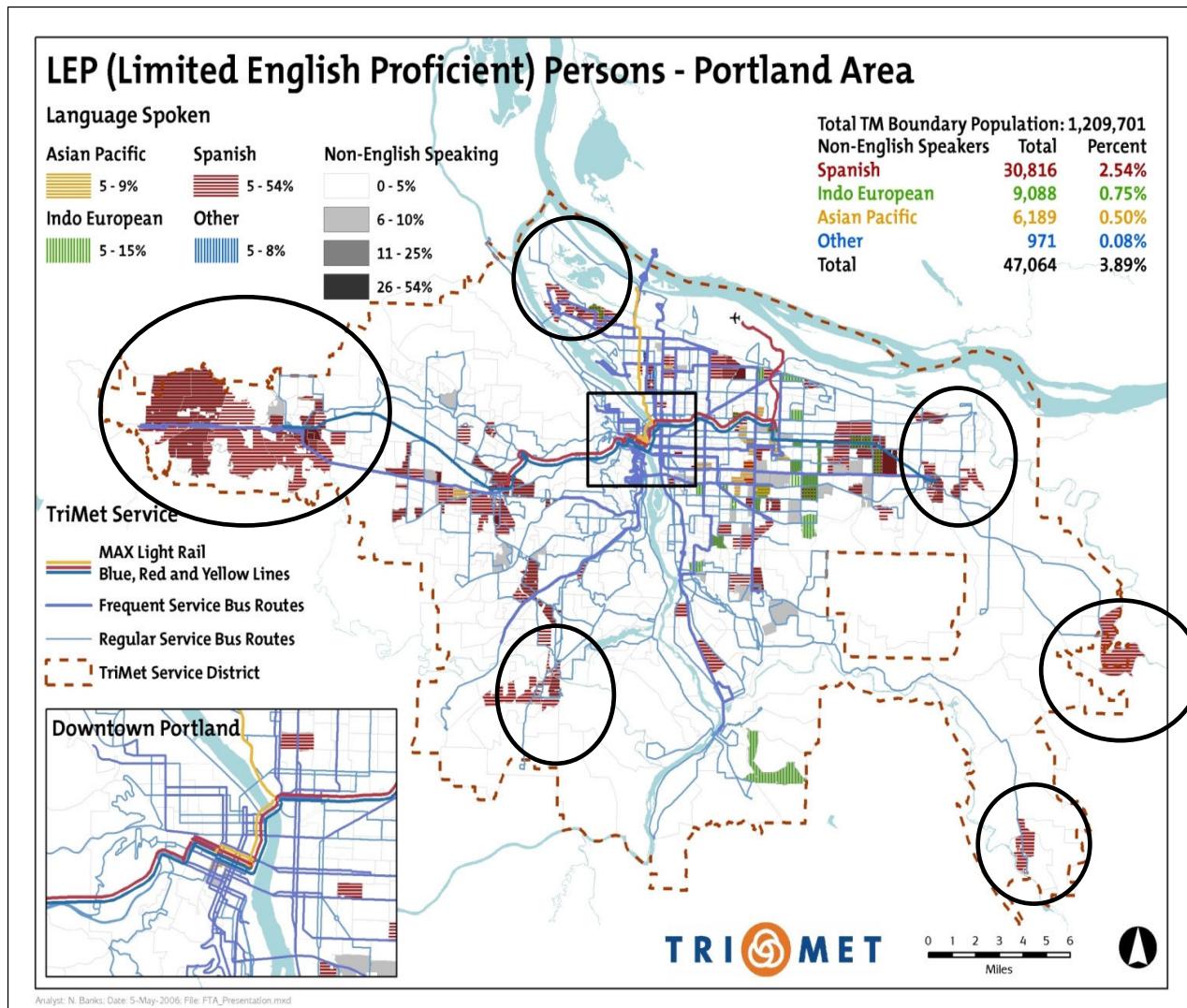
The **quantitative data** analysis showed that 47,064 (3.89%) of the 1,209,701 residents in TriMet’s service district met the DOT definition of LEP eligible populations. The LEP eligible populations in the TriMet district included speakers of Spanish, Vietnamese, Russian, Chinese, and Korean.



<sup>12</sup> English speaking ability = *not well or not at all*

The **LEP Map**: Using data from the 2000 Decennial Census and TriMet GIS mapping services, the following map was created to show the location of LEP communities within the TriMet service district coupled with an overlay of TriMet bus and rail service. In studying the map, the workgroup noted that:

- Spanish-speakers were more widely dispersed than the other language groups – forming both urban and semi-rural communities.
- Most of the urban LEP populations located themselves along well-served transit corridors.



The **qualitative information** received from community groups serving the LEP communities indicated that:

- Census and GIS representations of LEP population clusters throughout the region were reliable.
- Many newly arriving Spanish-speaking people were coming from rural areas of Mexico and other Latin American countries. Thus, the community was beginning to reflect larger numbers of regional-specific dialects and increasing levels of illiteracy (Spanish and English).

## **Factor 2: The frequency of contact**

### Methodology

To conduct Factor 2, the LEP Workgroup concentrated on an internal audit of LEP contact information generated by agency personnel, technological systems, and survey research. Relevant programs, activities, and services provided were categorized as: **ridership, fare purchases, and use of customer information resources** as these are the means by which people use or inquire about transit services and programs. Frequency of contact data related to these three areas came from a variety of sources:

- Ridership
  - Automatic Passenger Counters (APC) data
  - LIFT and Accessible Transportation Program (ATP) records
  - Survey research – written, telephone, in person
- Fare purchases
  - Ticket Vending Machines (TVMs)
  - *trimet.org* web sales
  - Outlet sales statistics
  - TriMet Ticket Office (TTO) sales records
  - Survey research (written, telephone, in person)
- Use of customer information resources
  - 238-RIDE – requests for language assistance, trip planning, and customer service
  - Multi-language web page usage
  - Multilingual brochures and customer alerts

### Findings

- The agency's three call centers provided call data for the 2005 LEP Needs Analysis. In looking at the data provided, less than one half of one percent (<0.5%) of the calls to the call centers requested language assistance. However, of those asking for assistance, the majority (82%) asked for help in Spanish.

CALL CENTER	Total Calls Per Month	Requests	
		Language Assistance	Spanish
238-RIDE	30,000	130	113
Accessible Transportation Program (ATP)	26,000	126	97
LIFT contracted paratransit service	43,000	75	62
<b>TOTALS</b>	<b>99,000</b>	<b>331</b>	<b>272</b>

NOTE: ATP includes LIFT, medical transportation for Medicaid-eligible riders in Oregon Health Plan, and oversees funding assistance provided by TriMet to community based volunteer and agency transportation through the *Ride Connection* program.

- The review found that, there was some survey information available on ethnicity/race and LEP status. Otherwise, there was no **comprehensive process in place to routinely capture LEP contact data** – either from technological systems or from standard survey data.

Data Sources	LEP 2005 Information Audit			
	Ethnicity Race	LEP Status	Frequency of Contact	Trip Purpose
<b>RIDERSHIP</b>				
Automatic Passenger Counters (APC)	No	No	No	No
LIFT and ATP records	Yes	No	Yes	Yes
Survey research	Yes	Yes	Yes	Yes
<b>FARES</b>				
Ticket vending machines (TVMs)	No	No	No	No
<i>trimet.org</i> web sales	No	No	No	No
Outlet sales statistics	No	Yes	No	NA
Survey research	Yes	No	Yes	Yes
<b>CUSTOMER INFORMATION</b>				
<u>238-Ride - Language assistance</u>				
Customer service issues	No	Yes	Yes	No
Trip planning assistance	No	Yes	Yes	No
Transit Tracker by Phone or Internet	No	No	Yes	No
TriMet Ticket Office (TTO)	No	Yes	No	No
Multilingual brochures/rider alerts	NA	NA	No	NA
Multi-language web pages	No	No	Yes	NA
NA = Not applicable				
NOTE: Written surveys will show if a survey is completed in a language other than English but does not necessarily indicate LEP status. For in-person and telephone survey research, if a person asks to complete an interview in another language, the LEP status is assumed.				

### **Factor 3: The importance to LEP persons of your program, activities, and services**

#### **Methodology**

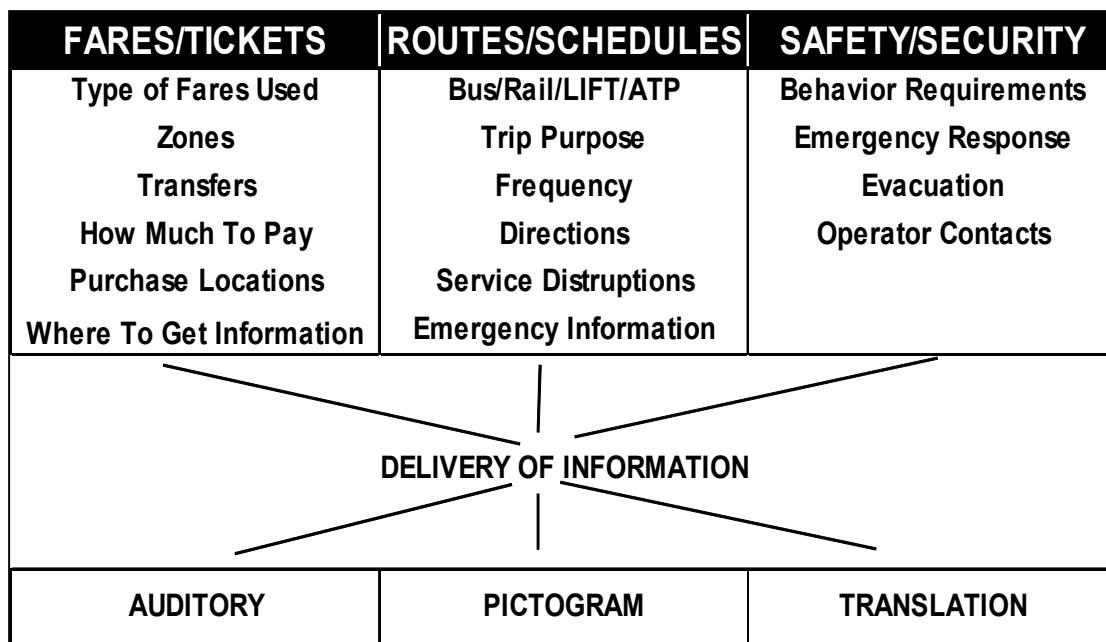
To address Factor 3, Tri Met staff designed and conducted two primary research projects: community roundtables and TriMet operator interviews. Because the budget for this project was minimal, TriMet staff was responsible for every component of the research project – from design through analysis and report writing.

#### **Community Roundtables: Spanish (2), Russian (1), Vietnamese (1)**

In the context of Factor 3, Task 3, Step 1 – the workgroup felt that TriMet's most *critical* services were related to **Fares and Tickets, Routes and Schedules, and Safety and Security**. These areas were chosen because language barriers could:

1. limit a person's ability to gain the full benefit from services, or
2. in the areas of safety and security – place a person in physical danger.

To stimulate discussion in the community groups, the following visual representation of the critical services was developed. The visual was translated into Spanish, Russian, and Vietnamese.



To ensure success with the groups, TriMet partnered with three social service agencies that provide services to the LEP populations of interest. Working in partnership with those agencies, a series of four roundtables were held — one in a rural, agricultural location and three in urban neighborhoods.

- Roles and responsibilities
  - TriMet: write the discussion guide, hire interpreters<sup>13</sup> for staff note takers, provide test materials and participant incentives, and analyze feedback and write report.
  - Partner agencies: provide meeting facility and facilitator, recruit participants, and arrange for refreshments
    - Spanish Speakers (2 Roundtables – 19 people)
      - ✓ Rural: Central Cultural, Cornelius, OR - 10/18/05
      - ✓ Urban: El Programa Hispano, Gresham, OR – 10/26/05
    - Russian Speakers (1 Roundtable – 12 people)
      - ✓ Urban: Lutheran Community Services (LCS), Portland, OR – 10/31/05
    - Vietnamese Speakers (1 Roundtable – 15 people)
      - ✓ Urban: LCS/Asian Community Services, Portland, OR– 12/21/05
- Discussion Focus:

Meeting participants discussed various elements related to their own TriMet travel including:

  - Experiences with TriMet's fares/tickets, routes/schedules, and safety/security issues
  - Understanding of customer information icons
  - Awareness of prohibited activities
  - Awareness of and use of TriMet's language assistance services
  - Suggestions to make riding TriMet easier

### Findings

Results from these LEP community roundtables indicated the following:

- Most roundtable participants said they were transit dependent<sup>14</sup> and rely on transit for almost all of their travel in the region.
- People ride TriMet for many reasons: work, school, visiting friends and family, shopping, doctor appointments and on personal business.
- Many community members indicated they travel with small children and elders.
- The primary frustrations LEP customers experienced using TriMet were *consistent with those experienced by other TriMet riders* including: late buses, pass-ups, concerns for personal safety, rude employees, confusion over zones boundaries and fares, and transfers. **However, language barriers can inhibit satisfactory resolution of their issues.**
- Most participants were unaware of the language services TriMet has to offer. As would follow, few had ever made use of the services.
- Participants said they know how to behave properly and do so when riding TriMet, but had encountered other people who were rude, and sometimes, dangerous. In these instances, they were hesitant to do anything as they might become the target of an assault. This is especially worrisome for those travelling with children and family members.

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<sup>13</sup> IRCO: Immigrant and Refugee Community Organization, Portland, Oregon

<sup>14</sup> Transit Dependent: I don't have a car available to use or I can't drive / don't know how to drive

- For the most part, operator/customer contacts are positive. However, language barriers and cultural missteps have the potential to create serious and long-lasting problems.
- When asked what they should do in the event of an emergency on board one of the TriMet vehicles, no one was quite sure what was expected of them.
- Because many LEP customers are new to the country and/or don't understand English well, **they rely heavily on family, friends and trusted community organizations to help them adapt and find their way.**

### **Conclusions and Recommendations**

- TriMet service (bus and rail) is very important to LEP customers as indicated by their: transit dependency, ridership frequency, and variety of trip purposes.
- The general lack of awareness of the agency's multilingual services among the target audiences points to the need for finding the proper venues for promoting these services.
- Study findings underscore the importance of:
  - Providing clear, easy to understand customer informational materials, replete with graphics and universally understandable iconography.
  - Working with members of the LEP communities to design written and graphic materials that are meaningful and easily understood.
  - Initiating, maintaining, and strengthening the relationships with agencies serving LEP populations. Such relationships will help TriMet address current or developing issues before major problems erupt.

## **TRIMET LIMITED ENGLISH PROFICIENCY (LEP) PROJECT**

### **Community Outreach: Discussion Guide**

#### **INTRODUCTION**

Hello all. I am \_\_\_\_\_ and I will be leading the discussion this (evening/morning/afternoon). We are all here to talk about the public buses and the MAX trains. TriMet is the agency that runs the buses and MAX trains and they need to know what information non-English speaking people need when they want to ride the buses or MAX. Your answers will be combined with others to help TriMet understand what they need to do to communicate with everyone in the community. TriMet will also be gathering information from the (Spanish, Russian and Vietnamese) communities.

Our conversation tonight will include:

- What is easy about using the bus or MAX trains;
- What is hard about using the bus or MAX trains;
- What information people need when they want to ride the bus or MAX trains; and
- How people learn how to ride the bus or MAX trains.
- We will also be talking about some of the concerns people have about riding the bus or MAX trains.

Before we get started, I have some introductions to make. I would like you to meet \_\_\_\_\_ and \_\_\_\_\_ from TriMet, the public transportation company. Their job is to find out what kind of information you need when you want to ride the bus or MAX. They are joined by \_\_\_\_\_ who will be providing interpreting services.

**Our discussion will be informal, but we do have a few guidelines we need to keep in mind.**

1. First, we will use our first names only – no last names.
2. We will be taping tonight's discussion and having it translated into English for the people at TriMet. Your names will not be used on the transcripts.
3. There are no "right" answers and no "wrong" answers.
4. We are all here to share our own opinions – we don't all have to agree.
5. So that I can hear everything you have to say, please speak up and let's just have one conversation at a time.
6. Please remember that everything you say will be kept private, so feel free to be very honest.  
Do you have any questions?

#### **RESPONDENT INTRODUCTIONS**

Let's get started. Please tell me:

- Your first name
- Have you ridden the bus or MAX at least once in the last year?
- How many trips have you made in the last month? (Count each direction as one way)
- Do you ride for work, school, visiting, shopping, etc.?
- Do you have a car available for your use?

Let's talk a little bit about getting around the area.

- For the most part, how do you get around the area? (Bus/MAX, carpool, drive, walk, bike, etc.)

- If there were no bus or MAX service, would that make getting around harder for you?
- How many of you ride the bus or MAX because you don't drive or don't know how to drive? (Just a show of hands)
- How many ride because you don't have a car? (Just a show of hands)
- Could you tell me what is easy about riding the bus or MAX trains? This does not have to be something you *personally* experienced, but heard about? (Stops close to home, goes where I need to go, etc.)
- What is hard about riding the bus or MAX trains? (Don't know how to plan a trip...how much to pay, etc?)
- Do you have any concerns about riding the bus or MAX? – Everyone
- Again, this does not have to be something you *personally* experienced, but heard about. (Don't know how to use the system; don't know where to get off, crime, afraid at night, too expensive, etc.)

## CUSTOMER INFORMATION

Next, I'd like to find out what kind of information people need when they want to ride the bus or MAX and how they get their information.

On these charts, we have listed the main types of information people say they need when they want to ride the bus or MAX. We are going to talk about each one.

- First, let's talk about Fares and Tickets. Your "fare" is the amount of money you pay to ride the bus or MAX, and your "ticket/or pass/or transfer" is your receipt. We have listed some of the things that people say are important to know about fares & tickets. Let's talk about each one and you can tell me what is "easy" or "hard" about that. Also, why that's easy or hard and where you get the information. Please feel free to add more to the list.

<u>FARES/TICKETS</u>		<u>ROUTES/SCHEDULES</u>		<u>SAFETY/SECURITY</u>	
<b>Easy? Why?</b>	<b>Hard – Why?</b>	<b>Easy – Why?</b>	<b>Hard? Why?</b>	<b>Easy? Why?</b>	<b>Hard? Why?</b>
What could TriMet do to make fares & tickets easy?		What could TriMet do to make routes & schedules easy?		What could TriMet do to improve safety & security?	
What is the best way for you to get information about fares & tickets?		What is the best way for you to get information about routes & schedules?		What is the best way for you to get information about safety & security?	
<b>WRITTEN?</b>		<b>VISUAL?</b>		<b>SPOKEN?</b>	

- Next, let's talk about Routes and Schedules. Here you see we have listed some of the things that people say are important about routes and schedules. Like before, let's talk about each one and you can tell us what is easy or hard about that. Also, why that's easy or hard and where you get the information. Please feel free to add more to the list.

3. Last, let's talk about Safety and Security. Here you see we have listed some of the things that people say are important about safety & security. Like before, let's talk about each one and tell us why that's easy or hard and where you get the information. Please feel free to add more to the list.

**(IF NOT MENTIONED: ASK ---)**

- How many of you have seen or met TriMet Fare Inspectors? Was that on the bus or MAX? Tell us about it.
- What about police or uniformed security guards? Have you seen or met any of them on the bus or MAX?
- Thinking about Fare Inspectors, police and security guards...do you feel safer riding the bus or MAX when they are around? Why or why not?

(After the exercise – review categories and confirm that everything is complete and clear)

4. Our next topic is about what we can or cannot do when riding the bus or MAX. We have some pictures that are meant to let people know which personal behaviors are expected from all bus and MAX train riders. Let's take a look at these pictures and see what TriMet is trying to tell us.

(Show each picture and ask the group what this means. If people don't know what the picture represents, tell them what it is and ask them if there is a better way to illustrate the message.)

**We are almost done now – we just have a couple more questions.**

5. How many of you know about or have used any of the following TriMet Customer Information sources?

- A. TriMet's Written pieces—such as the *How to Ride* brochure?
- B. TriMet's web site, *trimet.org*? The \_\_\_\_\_ language page on *trimet.org*?
- C. TriMet telephone services?
- D. 238-RIDE, Bus Stop ID, Customer Service, Transit Tracker by Phone

6. How many of you know about or have used the **Spanish service** on 238-RIDE?

7. How many of you have cell phones?

8. If you were at a bus stop, would you use your cell phone to call for bus arrival times?  
(Why/why not?)

9. What ONE THING could TriMet do to make bus or MAX riding easier for you?

**That's all. Thank you very much for coming tonight. Please see (NAME) and you will receive your (incentive) for participating in this research.**

**Prohibited Activities Icons**

# **Prohibited Activities**



**No smoking**

TriMet Code 28.15(1)(B)(3)



**T R I M E T**

## **Prohibited Activities List**

### **TRIMET CODE, CHAPTER 28 – REGULATIONS GOVERNING CONDUCT ON DISTRICT PROPERTY**

*(Title amended by Ordinance No. 168, Section 2), 28.15 Regulations.*

#### **A. Prohibited Activities on Transit:**

1. Failure to Vacate Elderly and Disabled Priority Seating
2. Smoking Prohibited
3. No Food and Beverages (in open containers)
4. No Radios, Compact Disk Players and other Sound-Emitting Devices without Earphones
5. No Shopping Carts and No Unfolded Carriages or Strollers
6. No Animals Except Properly Controlled Assistance Animals and Properly Contained Pets
7. No Noxious Fumes or Foul-Smelling Materials or Substances
8. No Oversized Packages
9. No Skateboards, Roller skates and In-line Skates
10. No Riding on Bicycles and No Transport of Bicycles except in Compliance with Administrative Rules
11. No Riding or Transport of Motorized Human Transporters and other Two-Wheeled Transportation Devices except in Compliance with Administrative Rules
12. No Corrosive and Soiling Substances
13. No Excessive Noise
14. No Display of Lights

#### **B. Prohibited Misuse of District Transit System:**

1. No use of District Transit System for Non-Transit Purposes: No person shall enter or remain upon, occupy or use a District Station for purposes other than boarding, disembarking or waiting for a District Vehicle...
2. No Destructive Conduct Involving a District Vehicle: No person shall interfere with the safe and efficient operation of a District Vehicle through conduct which includes to:
3. Extend any portion of his or her body through any door or window of a District Vehicle while it is in motion;
4. Attempt to board or de-board a moving District Vehicle;
5. Lie down on the floor in a District Vehicle or across the seats of a District Vehicle or Station...
6. Unreasonably prevent or delay the closure of an exterior door on a District Vehicle
7. Strike or hit a District Vehicle, stop or cross in front of a District Vehicle for the purpose of stopping the Vehicle or gaining passage after the Vehicle has concluded boarding;
8. In any manner hang onto, or attach himself or herself to, any exterior part of a District Vehicle while the Vehicle is resting or in motion.
9. No Refuse and Waste
10. No Destruction of Signs:
  - a. No Posting of Unauthorized Signs or Notices:
  - b. Violation of Signage
  - c. No Unlawful Gambling
  - d. No Possession of Un-punched
  - e. No Alcoholic Beverages
  - f. No Damaging or Defacing District Property (graffiti, damage, destroy, etc.)
  - g. No Misuse of District Parking Facility Meter (deface, tamper with, break, etc.)

#### **C. No Criminal Activity**

**D. Prohibited Risks to Transit System Security and Order:**

1. No Flammable Substances and Ignition Devices
2. No Weapons
3. No Activation of the Emergency Stop Device Except in an Emergency
4. No Interference with or Trespass on Light Rail Right-of-Way (enter/remaining upon right-of-way; stop/park vehicle; disobey district personnel/postings)
5. No Hazardous and Toxic Material or Substances
6. No Harassment and Intimidation:
7. No Explosive Materials or Devices
8. No Threats
9. No Interference with Emergency Response
10. No Abandonment of Packages
11. No Discharge or Detonation of a Weapon
12. No Violation of an Interdiction Command

## **Bus Operator Surveys (n=203)**

The TriMet bus operator is often the first contact a LEP passenger will have with the agency and the success or failure of that encounter can set the basis for future experiences on the system. Thus, operator input on the subject is critical.

### **Methodology**

To learn about the operator perspective on this subject, interviews were conducted to find out how operators communicate with LEP passengers and find ways to enhance those communication events.

Operator interviews were conducted at TriMet's Center Street Garage during fall 2005 schedule sign-up. Survey times were spread evenly throughout a two-week period to ensure operators with varying lengths of service were represented. A total of 203 operator interviews were completed to find out:

- Where they had most often encountered LEP passengers asking for information, and how frequently.
- How easy or difficult it is to communicate with LEP passengers.<sup>15</sup>
- Common questions asked by LEP passengers.
- How they communicate with LEP passengers.
- What TriMet could do to help operators communicate with LEP passengers.

### **Findings**

- Bus operators encountered LEP customers on 45 of 93 bus routes (48%) in the system.
- Operators in this project had varying degrees of difficulty communicating with LEP passengers. Factors contributing to their difficulties included:
  - The route driven and the proportion of LEP passengers encountered .
  - Operator experience in the field.
  - Operator ability to speak at least a few words of a foreign language.
  - Awareness and use of TriMet foreign language materials and services.
- The information LEP customers seek is the same as any other customers, primarily:
  - Fare information.
  - Zones – where do the zones start and stop and what does that mean for the cost of fares.
  - Length of time transfer is good.
  - How to get to different parts of town using TriMet.
  - Next stop information.
- To communicate with LEP passengers, some operators use sign language, point at maps, or ask other passengers for assistance with interpreting.
- Operators indicated that they would be helped most by:
  - Classes with tips on how to communicate with LEP customers.
  - Assistance learning second languages.
  - Effective foreign language materials for use in the field.

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<sup>15</sup> 1=Very difficult, 2=Somewhat difficult, 3=Somewhat easy, 4 = Very easy 5=I don't communicate (**do not read**)

## **Conclusions and Recommendations**

These findings indicate the need to:

1. Develop a training program that will help front-line employees work effectively with LEP customers. The training initiatives could include:
  - a. Multi-cultural awareness.
  - b. How to work with non-English speaking passengers.
  - c. Language lessons .
2. Work with operators and other front line staff to design foreign language materials for use in the field.

# TRI MET

## LEP Customer Experience - Operator Intercept Survey

Interviewer initials: \_\_\_\_\_ Date: \_\_\_\_\_

**Introduction** Hello, I am conducting a short survey about your experiences with passengers who speak limited English. Can I ask you a few questions about this?

If yes → Thank you. All the answers you give will be kept strictly confidential and will only be used when grouped with the answers of other operators.

If no → Thank, terminate, and tally: \_\_\_\_\_

- 1.a. First, thinking about the routes that you have driven in the last year, on which routes have you most often had passengers who speak limited English ask you for information? (Fill in answer below under Route in Q1b.)
- 1.b. For (that route/those routes), approximately how often did limited-English-speaking-passengers ask you for information? (Probe and clarify – Get answer in a number or range by day/week/month.)

ROUTES	Times per day, or	Times per week, or	Times per month
#			
#			
#			

2. In general, how difficult or easy is it for you to communicate with limited-English-speaking-passengers? Would you say:
  - <sub>1</sub> Very difficult    <sub>2</sub> Somewhat difficult    <sub>3</sub> Somewhat easy    <sub>4</sub> Very easy
  - <sub>5</sub> I don't communicate (*Don't read*)
3. What type of question do you get asked the most from limited-English-speaking-passengers? (*Do not read list; check all that apply.*)
  - <sub>1</sub> Fare                       <sub>3</sub> How to get to their destination (handed address)
  - <sub>2</sub> Where their stop is     <sub>4</sub> Don't get asked questions
  - <sub>9</sub> Other: \_\_\_\_\_
4. When you need to communicate with limited-English-speaking-passengers, how do you do it? (*Do not read list; check all that apply.*)
 

<input type="checkbox"/> <sub>1</sub> Alert them to their stop	<input type="checkbox"/> <sub>4</sub> How To Ride brochure	<input type="checkbox"/> <sub>7</sub> Farebox Spanish
<input type="checkbox"/> <sub>2</sub> Use diagrams or maps	<input type="checkbox"/> <sub>5</sub> Ask other passengers for help	
<input type="checkbox"/> <sub>8</sub> I don't communicate	<input type="checkbox"/> <sub>3</sub> Point to fare signage	<input type="checkbox"/> <sub>6</sub> Paddle w/translations
<input type="checkbox"/> <sub>9</sub> Other: _____		

5. Are you aware of any materials, services, or tools that TriMet uses to communicate with limited-English-speaking passengers?

<sub>1</sub> No       <sub>2</sub> Don't know

<sub>3</sub> Yes → What are those materials, services, or tools?

*(Do not read list; check all that apply.)*

<sub>4</sub> How To Ride brochures

<sub>7</sub> MAX announcements

<sub>5</sub> Language translation at 238-RIDE

<sub>8</sub> Paddle w/translations

<sub>6</sub> Website

<sub>9</sub> Farebox Spanish

<sub>10</sub> Other: \_\_\_\_\_

6. Is there something TriMet can do to help you communicate with limited-English-speaking passengers?

<sub>1</sub> No       <sub>2</sub> Don't know

<sub>3</sub> Yes → What can TriMet do? \_\_\_\_\_

7. Have you had any TriMet training on how to communicate with limited-English-speaking passengers?

<sub>1</sub> No       <sub>2</sub> Don't know/can't remember

<sub>3</sub> Yes → Please tell me about the training: \_\_\_\_\_

8. Thinking about all the issues you face in your job, how difficult is communicating with limited-English-speaking passengers compared to the rest of the issues? **Please answer using a scale of 1 to 10 where 1 is not at all difficult and 10 is very difficult.**

**Not at all difficult- 1    2    3    4    5    6    7    8    9    10- Very difficult**

<sub>11</sub> I don't communicate (*Don't read*)

9. Overall, what are the most difficult issues you face in your job?

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10. Do you speak another language besides English?

<sub>1</sub> No

<sub>2</sub> Yes → What language?  <sub>3</sub> Spanish    <sub>4</sub> Russian    <sub>9</sub> Other: \_\_\_\_\_

11. How long have you been driving for TriMet? \_\_\_\_\_

12. Do you drive full-time or part-time?  <sub>1</sub> FT    <sub>2</sub> PT

13. What garage do you drive from?    <sub>1</sub> Center    <sub>2</sub> Merlo    <sub>3</sub> Powell

***THOSE ARE ALL THE QUESTIONS I HAVE. THANK YOU.***

#### **Factor 4: The resources available to the recipient and costs**

##### Methodology

To conduct Factor 4, the LEP Workgroup prepared the following table listing the agency's language assistance services and the estimated cost for each.

ITEM	Translation Cost	Print Quantity	Print Cost
Each translated web page	\$ 500	NA	NA
Telephone translation/interpreter services	\$ 35,000	NA	NA
How To Ride Brochures	\$ 1,307	20,000	\$ 4,798
Bus stop closure translation	\$ 80	NA	NA
Operator "Paddle" -- Card w/multi-language words and phrases for riding	\$ 200	800	\$ 2,446
Surveys (Origin & Destination)	\$ -	60,000	\$ 3,396
Transit Tracker by Telephone (Interpreter)	\$ 100	NA	NA
Safety & Security Handbills			
<i>Safety handbill</i>	\$ 80	5,000	\$ 843
<i>Security Rider tip card</i>	\$ 80	5,000	\$ 854
Spanish language coloring book	\$ 225	5,000	\$ -
Chinese and Spanish Yellow page ads	\$ 200	1	\$ -
Fare survey	\$ 110	50,000	\$ 4,665
Ticket Vending Machine (TVM) screens	\$ 135	NA	NA
<b>TOTALS</b>	<b>\$ 38,017</b>		<b>\$ 17,002</b>

NOTE: Data provided for the 2005 LEP Needs Analysis

##### Findings

- The result of the review indicated that TriMet has been providing language assistance for a good number of years.
  - The customer service telephone service (238-RIDE) has been providing interpreter services in **virtually any language** since September of 1996.
  - The multi-lingual *How To Ride Brochure* provides basic ridership information in six languages and has been produced for nearly 20 years.
- Other examples of services provided over the years include:
  - Key transit information and online Trip Planner in Spanish on TriMet's website.
  - Transit Tracker by Phone information in Spanish via 238-RIDE.
  - Foreign-language ads in publications serving second language populations to demonstrate *TriMet's commitment to full information*; to share current significant, service-related announcements; and to increase comfort levels regarding access to information in a native language.
  - MAX (light rail system) announcements recorded in both Spanish and English.
  - Spanish-language interface for Ticket Vending Machine (TVM) transactions.
- New services to add include:
  - A targeted approach to serving Spanish-speaking LEP customer.
  - Attention to the translation of "Vital" documents.
  - Provide notice of no cost second language services in each of the "five languages."

- Provide notice of free written translation or oral interpretation of certain non-vital documents, or assistance at public meetings.
  - Provide staff training for front-line staff to help them work with LEP customers.
  - Provide training for all staff to information of TriMet's LEP services.
  - Monitor LEP activities within the agency: perform regular LEP check-ups to make sure TriMet continues to be in compliance and meeting the needs of the region's LEP populations. Review to be conducted, informally, on an ongoing basis and formally every year for five years. At the end of five years staff will determine if a yearly evaluation is warranted.
- By far, the majority of agency resources go into the telephone language assistance service. At **\$35,000**, this is the most expensive of the services provided, especially given that less than one half of one percent of all calls received required the assistance of interpreters.

### **Conclusions and Recommendations**

- Results from the review show that TriMet has been proactively seeking ways to meet the needs of the region's LEP communities on a relatively small budget for many years. And these are services the agency should continue to provide.
- To help contain costs, continue current LEP initiatives, and launch new programs, major efforts (such as translating and printing *vital* and *non-vital documents*) should take place in conjunction with regularly scheduled reprinting and/or replacement of existing materials.
- To grow the program, new sources of internal and/or external funding would be needed.

### **3: LEP Planning: Tasks & Responsibilities Checklist**

## LEP PLANNING: TASKS & RESPONSIBILITIES CHECKLIST

Based on US/DOT-FTA Guidelines, April 2007<sup>16</sup>

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### **Part 1: Limited English Proficiency (LEP) Needs Analysis Checklist**

***Individuals, who have a limited ability to read, write, speak, or understand English are limited English proficient, or “LEP.”***

LEP 4-Point Scale: Speak English Very well, well, not well, or not at all.

LEP = do not speak English well, or do not speak English at all

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**Factor 1: The Number and Proportion of LEP Persons Served or Encountered in the Eligible Service Population.**

Task 1, Step 1: Examine prior experiences with LEP individuals

Marketing Research: Operator Survey, Community Roundtable Discussions, customer service contacts (telephone and in-person)

Task 1, Step 2: Become familiar with data from The U.S. Census

Step 2A: Identify the geographic boundaries of the area that your agency serves  
Geographic Information Systems (GIS) Department

Step 2B: Obtain Census data on the LEP population in your service area  
GIS: 2000 Decennial Census, Modern Language Association, Mapping technology

LEP populations represent 3.89 percent of the total TriMet service district.

Of the LEP populations: Spanish-speakers = 65%, Vietnamese = 11%, Russian = 9%, Chinese = 6%, and Korean = 4%.

Step 2C: Analyze the data you have collected  
LEP Workgroup Full Team<sup>17</sup> (TEAM)

Step 2D: Identify any concentrations of LEP persons within service area  
GIS: Produced regional map showing TriMet service boundaries, LEP concentrations with TriMet bus and rail service overlay

Task 1, Step 3: Consult state and local sources of data

TEAM: Other sources of population data considered for use included LEP data from school districts within the TriMet boundaries. Given the robust set of regional population data from the Census plus the feedback from area service agencies, the workgroup deemed that the data used was sufficient for the tasks at hand.

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<sup>16</sup> *Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons, A Handbook for Public Transportation Providers*, The Federal Transit Administration Office of Civil Rights, April 2007

<sup>17</sup> **FULL TEAM:** Bus Operations, Capital Projects, Creative Services, Customer Services, Diversity & Transit Equity (DTE), Geographic Information Systems (GIS), Customer Information Development and Publication (IDP), Human Resources, Legal Services, Marketing Research, Service Planning

Factor 1 (Continued)

- Task 1, Step 4: Reach out to community organizations that serve LEP persons
  - Step 4A: Identify community organizations  
TEAM: Listed contacts at CBOs, FBOs, immigrant and refugee organizations, health and county services
  - Step 4B: Contact relevant community organizations  
Diversity & Transit Equity (DTE) staff contacted relevant community organizations and discussed status of immigrant/LEP populations in the region.
  - Step 4C: Obtain information (DTE).
- Factor 2: The Frequency with Which LEP Individuals Come into Contact with your programs, activities, and services**
  - Task 2, Step 1: Review the relevant programs, activities, and services you provide  
TEAM: Defined *relevant programs, activities, and services* to be:
    - **Ridership**
    - **Fare purchases**
    - **Use of customer information resources**
  - Task 2, Step 2: Review information obtained from community organizations  
TEAM: Reviewed information from contacts and shared with LEP Workgroup
  - Task 2, Step 3: Consult directly with LEP persons  
Marketing Research: Community Roundtable Discussions
    - Spanish Speakers (2 Roundtables – 19 people)  
Rural: Central Cultural, Cornelius, OR - 10/18/05  
Urban: El Programa Hispano, Gresham, OR – 10/26/05
    - Russian Speakers (1 Roundtable – 12 people)  
Urban: Lutheran Community Services (LCS), Portland, OR – 10/31/05
    - Vietnamese Speakers (1 Roundtable – 15 people)  
Urban: LCS/Asian Community Services, Portland, OR– 12/21/05
- Factor 3: The Importance to LEP Persons of Your Program, Activities and Services**
  - Task 3, Step 1: Identify your agency's most critical services  
TEAM: Identified *agency's most critical services* to be:
    - **Fares and tickets**
    - **Routes and schedules**
    - **Safety and security**

These were chosen because language barriers in these areas could:

    1. Limit a person's ability to gain the full benefit from services, and/or
    2. Place a person in physical danger
  - Task 3, Step 2: Review input from community organizations and LEP persons  
Marketing Research: Information from CBOs, LEP Community Round Table Discussions  
Feedback showed:
    - TriMet service (bus and rail) is very important to LEP customers as indicated by their: transit dependency, ridership frequency, and variety of trip purposes.

### Factor 3 (Continued)

- The general lack of awareness of the agency's multilingual services among the target audiences points to the need for finding the proper venues for promoting these services.
- Some LEP customers are illiterate in their native languages as well as English.
- Study findings underscore the importance of:
  - Providing clear, easy to understand customer informational materials, replete with graphics and universally understandable iconography.
  - Working with members of the LEP communities to design written and graphic materials that are meaningful and easily understood.
  - Initiating, maintaining, and strengthening the relationships with agencies serving LEP populations. Such relationships will help TriMet address current or developing issues before major problems erupt.

### **Factor 4: The Resources Available to the Recipient and Costs (TEAM)**

- Task 4: Weigh the demand for language assistance against the agency's current and projected financial and personnel resources.
- Task 4, Step 1: Inventory language assistance measures currently being provided, along with associated costs.
- Task 4, Step 2: Determine what, if any, additional services are needed to provide meaningful access
- Task 4, Step 3: Analyze your budget
- Task 4, Step 4: Consider cost effective practices for providing language services.

## PART 2: LEP Implementation Schedule Checklist

### **Task 1: Identifying LEP Individuals Who Need Language Assistance**

Analysis of 2000 U.S. Census data showed that LEP populations represent 3.89 percent of the total TriMet service district. Of the LEP populations, the largest group is the Spanish-speakers (65%), followed distantly by Vietnamese (11%), Russian (9%), Chinese (6%), and Korean (4%).

### **Task 2: Language Assistance Measures**

After an extensive review of the LEP populations and their needs, the LEP Workgroup recommended a two tiered approach to meeting the needs of LEP populations in the TriMet district.

#### ***Tier One: Successful Activities to Continue***

Tier One retained existing programs and activities designed to meet the language needs of regional LEP populations such as:

1. telephone interpreters in virtually any language;
2. multilingual printed materials and multilingual information on the TriMet web site; and
3. continuing development of partnerships with community organizations that serve LEP populations.

#### ***Tier Two: New Areas of Focus***

Tier Two identified seven new areas of focus to further the agency's goal of providing LEP customers with *meaningful access* to TriMet programs and services. Guidelines for each of the seven areas were approved and incorporated into the LEP Access Plan and Implementation Schedule and employee training program.

1. **Language Assistance:** Provide free language assistance for non-vital yet important outreach documents and in-person interpreter services for events where public testimony is solicited.
2. **Vital Documents:** Determine which documents are **vital** for translation, and choose the format(s) to most effectively communicate the messages contained in those documents.
3. **Training:** Train all front line and second level staff to effectively engage and respond to LEP customers.
4. **Definitions and Standards:** Develop a method to ensure consistency in the application of competency standards for interpreters and translators.
5. **Customer Information:** Provide timely, relevant information about TriMet programs and services to the LEP communities in the key LEP languages.
6. **Outreach:** Conduct culturally-competent outreach to LEP communities to increase awareness and use of TriMet services and programs.
7. **Research and Administration:** Develop a means to assess and monitor the effectiveness of TriMet's LEP Plan internally and externally on an ongoing and annual basis.

**Task 3: Training Staff**

- Task 3, Step 1: Identify agency staff that are likely to come into contact with LEP persons as well as management staff. (TEAM)
- Task 3, Step 2: Identify existing staff training opportunities (Marketing)
- Task 3, Step 3: Design and implement LEP training for agency staff (Marketing)
- A summary of the transit agency's responsibilities under the DOT LEP Guidance;
- A summary of the agency's language assistance plan;
- A summary of the number and proportion of LEP persons in the agency's service area, the frequency of contact between the LEP population and the agency's programs and activities, and the importance of the programs and activities to the population;
- A description of the type of language assistance that the agency is currently providing and instructions on how agency staff can access these products and services; and
- A description of the agency's cultural sensitivity policies and practices

**Task 4: Providing Notice to LEP Persons**

This part of the plan should identify how the agency will advertise its language services to the LEP community. (Marketing and Customer Services)

- Post signs in intake areas and other entry points.
  - Include notice in agency outreach documents that language services are available.
  - Work with community-based organizations and other stakeholders to inform LEP individuals of the TriMet's services, including the availability of language assistance services.
  - Use an automated telephone voice mail attendant or menu system.
  - Include notices in local newspapers in languages other than English.
  - Provide notices on non-English-language radio and television stations about the available language assistance services and how to get them.
  - Provide presentations and/or notices at schools and religious organizations.
- Task 4, Step 1: Inventory the existing public service announcements and community outreach the agency currently performs. (Marketing)
- TriMet communicates with the public through *one or more* of the following methods:
- Signs and handouts available in vehicles and at stations
  - Announcements in vehicles and at stations
  - Agency websites
  - Customer service lines
  - Press releases
  - Newspaper, radio, and television advertisements
  - Announcements and community meetings
  - Information tables at local events
- Task 4, Step 2: Incorporate notice of the *availability of language assistance* into existing outreach methods. Ongoing, Standard Operating Procedure
- Task 4, Step 3: Conduct targeted community outreach to LEP populations and CBOs serving those populations. Ongoing, Standard Operating Procedure

**Task 5: Monitoring and Updating the LEP Plan**

The LEP Plan will be reviewed informally and formally. (Marketing Research/LEP Coordinator)

Informally – LEP Coordinator

- Task 5, Step 1: Establish a process to obtain feedback on your agency's language assistance measures
- Task 5, Step 2: Obtain feedback from community members, agency staff, CBO representatives and TriMet staff
- Task 5, Step 3: Conduct internal monitoring

Formally - Annually for the first 5 years of the program, starting in Spring 2011

- Task 5, Step 4: Make changes to the language assistance plan based on feedback received
  - Current LEP populations in the service area or population affected or encountered
  - Frequency of encounters with LEP language groups
  - Nature and importance of activities to LEP persons
  - Availability of resources, including technological advances and sources of additional resources, and the costs imposed
  - Whether existing assistance is meeting the needs of LEP persons
  - Whether staff knows and understands the LEP plan and how to implement it
  - Whether identified sources for assistance are still available and viable
- Task 5, Step 5: Consider new language assistance needs whenever expanding service.  
Ongoing, Standard Operating Procedure (LEP Coordinator/Service Planning)
- Task 6: Monitor and update the *Vital for translation status* of current and pending documents.  
Ongoing, Standard Operating Procedure (LEP Coordinator/Legal services)

ATTACHMENT G: UPDATED FOUR FACTOR ANALYSIS

**TriMet Title VI/Limited English Proficiency  
Updated Needs Assessment**

**September 11, 2012**

**Introduction**

**Context of the Assessment**

The Federal Transit Administration conducted a Title VI Compliance Review of TriMet in March 2011 and one finding in the preliminary report of the review is that TriMet needed to update its Four Factor Analysis to determine frequencies of encounters as a more accurate measure of LEP needs of TriMet area residents.

The preliminary report states that TriMet has relied highly on the 2010 Census data and has not utilized other data and observations from school registrations, communities, or other organizations that have very useful insight about the visitors, or community members that have limited English Proficiency. The following updated analysis seeks to address and correct this item identified in the preliminary review.

**Title VI Regulatory Background**

1. Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d et seq., and its implementing regulations provide that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity that receives Federal financial assistance. The Supreme Court, in *Lau v. Nichols*, 414 U.S. 563 (1974), interpreted Title VI regulations promulgated by the former Department of Health, Education, and Welfare to hold that Title VI prohibits conduct that has a disproportionate effect on LEP persons because such conduct constitutes national origin discrimination.
2. Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" Reprinted at 65 FR 50121 (August 16, 2000), directs each Federal agency to examine the services it provides and develop and implement a system by which LEP persons can meaningfully access those services. Federal agencies were instructed to publish guidance for their respective recipients in order to assist them with their obligations to LEP persons under Title VI. The Executive Order states that recipients must take reasonable steps to ensure meaningful access to their programs and activities by LEP persons.

## **Department of Transportation LEP Guidance**

The U.S. Department of Transportation (DOT) published revised LEP guidance for its recipients on December 15, 2005, which states that Title VI and its implementing regulations require that DOT recipients take reasonable steps to ensure meaningful access to their programs and activities by LEP persons. The Federal Transit Administration published its LEP Guidance in its Circular 4702.1A “Title VI and Title VI Dependent Guidelines for FTA Recipients” on April 13, 2007, which requires recipients to develop an LEP implementation plan consistent with the provisions of Section VII of the DOT LEP guidance.

## **Four Factor Analysis**

The U. S. Department of Transportation (DOT) issued its *Policy Guidance Concerning Recipient's Responsibilities to Limited English Proficient (LEP) Persons* [Federal Register: December 14, 2005 (Volume 70, Number 239)]. This policy states that DOT recipients are required to take reasonable steps to ensure meaningful access to programs by LEP persons. This coverage extends to the recipient's entire program. There are four factors for agencies to consider when assessing language needs and determining what steps they should take to ensure access for LEP persons: 1) The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity or service of the recipient; 2) The frequency with which LEP individuals come in contact with the program; 3) The nature and importance of the program, activity or service provided by the recipient to people's lives; and 4) The resources available to the recipient and costs. A description of the self-assessment undertaken in each of these areas follows.

## **Evaluation Methods and Data Sources**

Service providers are instructed to consider languages spoken by the populations within their service area to determine whether language barriers exist. In accordance with FTA's policy guidance, the initial step for providing meaningful access to services for LEP persons and maintaining an effective LEP program is to identify LEP populations in the service area and their language characteristics through an analysis of available data. Determining the presence of LEP populations in the TriMet service district area was done through an analysis of the following data sources:

- US Census Bureau, 2006-2010 5-year sample, American Community Service data.
- Oregon Department of Education, 2009-2010 school year enrollment data.
- Maps showing TriMet district with concentration of LEP individuals.
- Information gathered through discussion with members of community organizations serving LEP constituents.
- Driver/staff surveys about contact with LEP persons.
- Other internal data available showing frequency of contact with LEP persons.

**Factor 1: The number and proportion of LEP persons served or likely to be encountered by a TriMet program, activity or service.**

**2006 - 2010 American Community Survey 5-Year Sample**

The US Census Bureau collects data about the ability to speak English as well as the language spoken at home via the American Community Survey (ACS) and allows for the identification of LEP languages falling within the “Safe Harbor” thresholds. The thresholds are 5% of total population or 1,000 individuals, whichever is less. This data was retrieved for the three-county region (Clackamas, Multnomah, and Washington counties) in which TriMet provides service. TriMet maintains geographic information delineating its service boundary as well as its bus and rail service.

For this Factor 1 Analysis, 2006-2010 5-year Census ACS data was analyzed in conjunction with TriMet geographic data to identify LEP population in accordance with DOT guidelines within TriMet service district as well as those populations access to TriMet bus and rail service. The LEP population is defined as the person who reported to the Census Bureau that they speak English “less than very well.”

TriMet may follow the DOT “safe harbor” guidance in providing written translations of vital documents for each language group that constitutes at least 5% or 1,000 LEP individuals, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. Translations of other documents, if needed, can be provided orally. If there are fewer than 50 persons in a language group that reaches the 5% trigger, written translation is not required but written notice will be provided in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost. Failure to provide written translations under the “safe harbor” criteria does not mean there is “non-compliance with LEP access requirements, but adherence to the “safe harbor” criteria will serve as strong evidence of compliance.

**Quantitative Results**

**Census Data.** Analysis of the quantitative data showed that of the estimated total population aged five years and older within Clackamas, Multnomah, and Washington counties (1,494,822) LEP populations (127,008) represent 8.5% with the largest proportion consisting of Spanish speaking LEP individuals (4.56%).

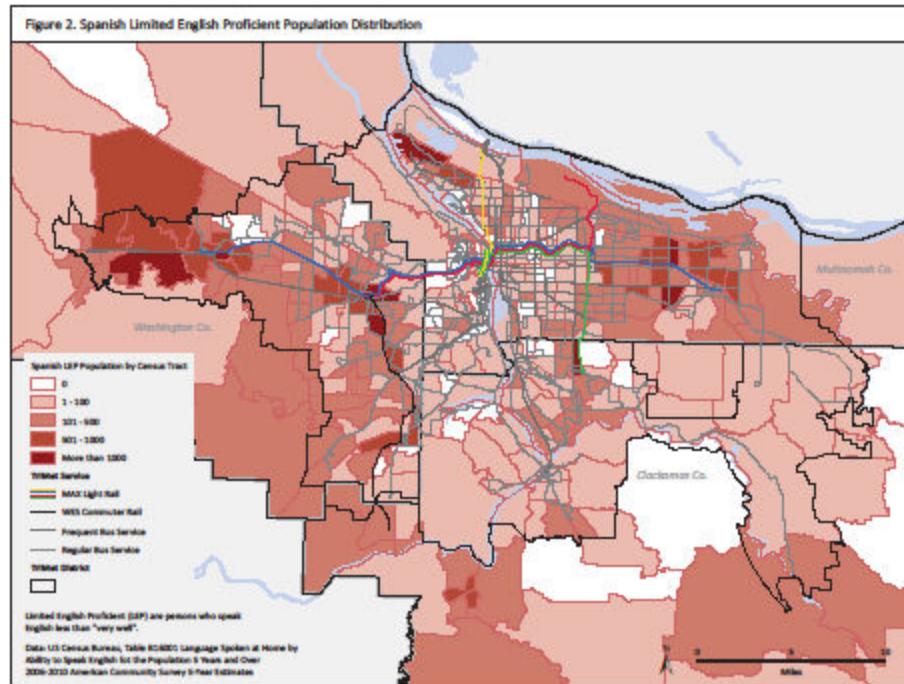
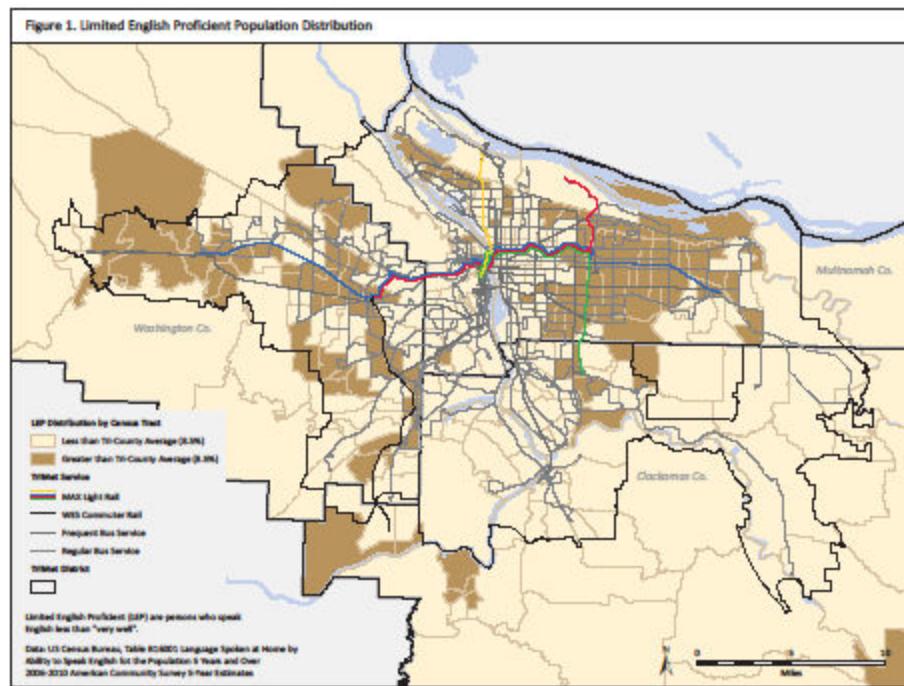
**Table 1. ACS Languages Spoken by LEP Persons Age 5 and Older (Clackamas, Multnomah, and Washington Counties)**

Language Spoken at Home	LEP Population Estimate	Percentage of Total Population	Percentage of LEP Population
Spanish	68,194	4.56%	53.69%
Vietnamese	13,052	0.87%	10.28%
Chinese (Cantonese, Mandarin)	8,900	0.60%	7.01%
Russian	7,346	0.49%	5.78%
Korean	4,288	0.29%	3.38%
Japanese	2,668	0.18%	2.10%
Ukrainian	2,539	0.17%	2.00%
Romanian	1,779	0.12%	1.40%
Tagalog	1,613	0.11%	1.27%
Arabic	1,609	0.11%	1.27%
Mon-Khmer, Cambodian	1,318	0.09%	1.04%
Other Languages	13,702	0.92%	10.79%
<b>Total</b>	<b>127,008</b>	<b>8.50%</b>	

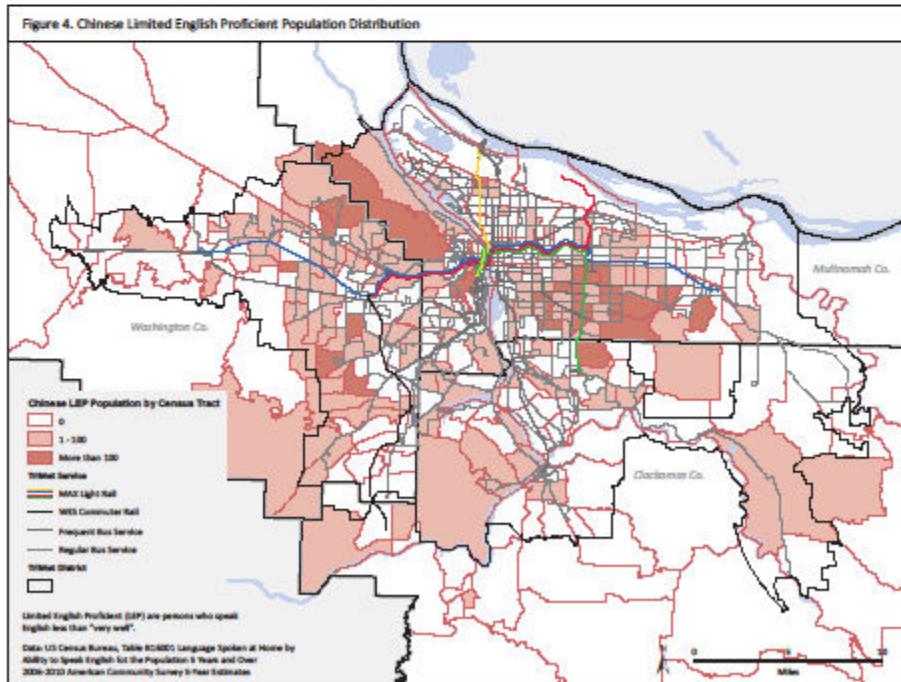
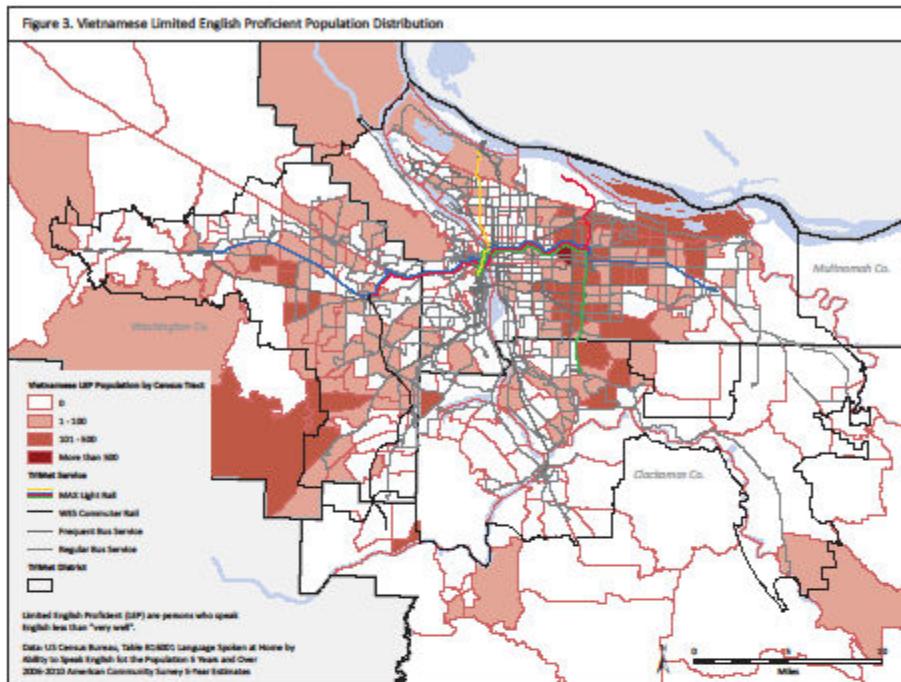
Source: US Census Bureau, 2006-2010 5-year American Community Survey, PUMA cross-tabulation.

**LEP Maps.** Census ACS data was plotted on a series of maps and overlaid with TriMet's bus and rail service. The following overview map (Figure 1) shows LEP populations greater than the region average of 8.5% concentrated primarily in western and eastern suburban locations as well as north Portland. The next five maps provided detail the distribution of speakers of the five largest LEP languages: Spanish (Fig. 2), Vietnamese (Fig. 3), Chinese (Fig. 4), Russian (Fig. 5), and Korean (Fig. 6).

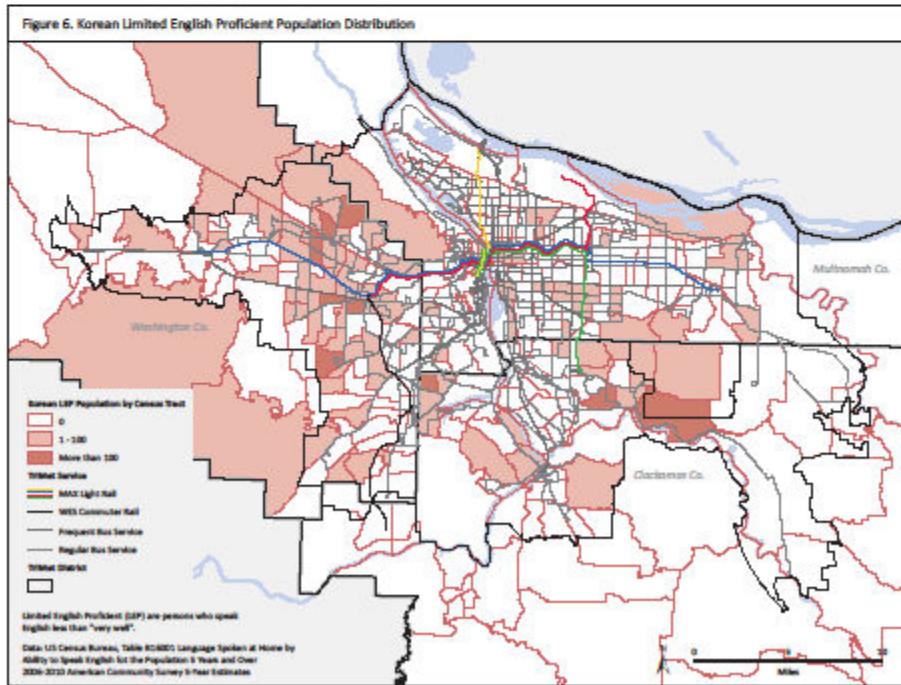
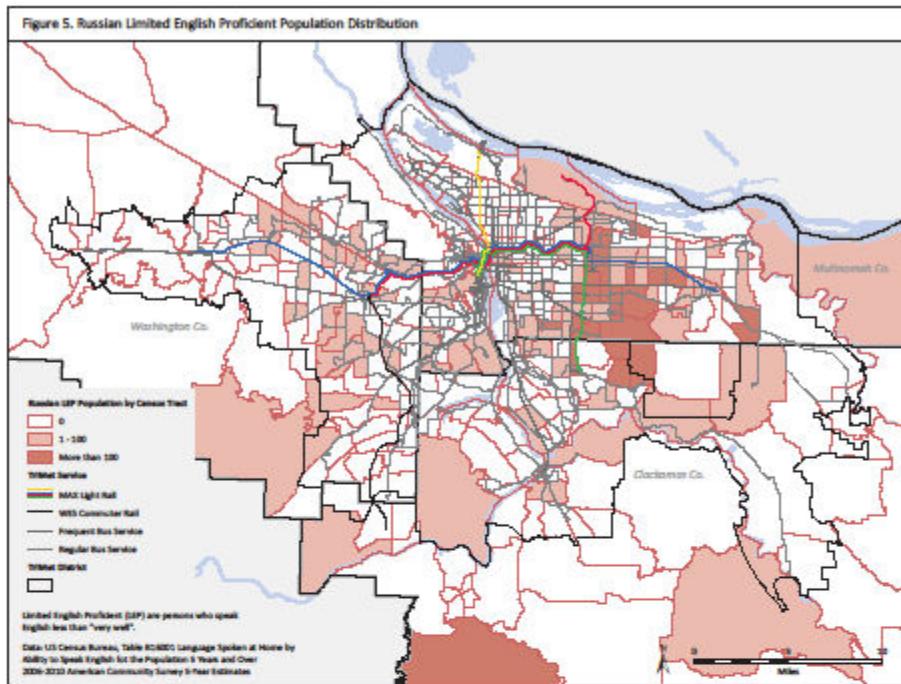
Figures 1 and 2.



Figures 3 and 4.



Figures 5 and 6.



## Oregon Department of Education

In addition to considering the Census data 2006-2010 American Community Survey 5-year estimates, the Factor 1 analysis considered the most recent data on the Student Language of Origin from the Oregon Department of Education for the 2009-2010 school years. The data includes statistics on the language spoken at home by students ranging from kindergarten to high school. It is assumed that if children are identified as speaking a language other than English, then their parents or adult guardians are likely to speak the same language at home. While this data set will not identify the number of people above the school range that speak a language other than English, it can be helpful in determining the concentrations of the population speaking a similar language. This data however does not paint an accurate picture of the number of individuals who would be identified as LEP in accordance to the Census definition, as this data only identifies language spoken at home and not their level of English Proficiency or whether these students are enrolled in the English as a Second Language (ESL) Program in their respective schools.

The data and findings were prepared for TriMet by the School of Education, Regional Research Institute of Portland State University (PSU). TriMet provided PSU Center of Success with the list of the following school districts serving students within the TriMet boundaries:

Beaverton, Centennial, David Douglas, Estacada, Forest Grove, Gladstone, Gresham-Barlow, Hillsboro, Lake Oswego, North Clackamas, Oregon City, Oregon Trail, Parkrose, Portland, Reynolds, Riverdale, Sherwood, Tigard, Tualatin, West Linn-Wilsonville.

Region wide (TriMet district), PSU's School of Education, Regional Research Institute found that out of the top 34 languages they identified, the percentages of non-English language of origin students are highest for Spanish, Russian, and Vietnamese in that order. They also noted the following information regarding school districts in Multnomah, Washington and Clackamas counties:

### Clackamas County

- Language diversity in Clackamas County is reflected in higher concentrations in the North Clackamas and Canby School Districts compared to other districts in Clackamas County.
- Overall, Spanish language of origin is the largest language group in the county, but it is significantly concentrated in North Clackamas, Canby, Molalla River, Oregon Trail, Estacada and Gladstone School Districts. It is worth noting that Canby has almost double the percentage Spanish representation as the other districts.
- Other languages seen in the other two counties are much less represented in Clackamas County, notably Russian (2.39%), Ukrainian (.79%), Vietnamese (.83%) and Chinese (.68%)

All districts in Clackamas are above 80% English language of origin except North Clackamas, Molalla River and Canby.

### Multnomah County

- In Multnomah County about 40% of students have a language other than English as their first language. The implication would be that adult members of the household would also fit this profile, although that cannot be confirmed with student data.
- The dominant non-English languages in the schools in the county are Spanish, Russian, Ukrainian and Vietnamese.
- Reynolds, Parkrose and David Douglas School Districts have approximately 50% or less native English speakers. In the case of David Douglas and Reynolds School Districts, only about 45% of students report English as their first language.
- Portland Public Schools and David Douglas School District have significant numbers of Chinese students not seen in the other districts.
- Portland Public Schools and David Douglas School District have larger numbers of Somali students than other districts in the county.
- There is a larger concentration of Slavic Languages (Russian, Ukrainian, Romanian, Hungarian, and Bosnian) in the districts in Multnomah County that is not seen in Washington County.

### Washington County

- Beaverton School district has the greatest diversity of languages among the Washington County districts
- Washington County has higher numbers of Asian Languages and smaller numbers of Slavic languages compared to Multnomah County. These include Chinese, Korean, Japanese and Vietnamese.
- Almost half the students in Forest Grove are listed as Spanish language of origin, while Beaverton and Tigard-Tualatin reflect approximately 25% Spanish Language and Hillsboro reflects a 35% Spanish language representation.
- Most language diversity in Washington County appears to be concentrated in Beaverton, Forest Grove and Tigard-Tualatin and Hillsboro School Districts.

The following table shows the actual of number of students enrolled in the Tri-County area identified by their first language. The next table displays the languages in alphabetical order and not in numerical order.

**Table 2. Number of students by First Language in the Tri-County Area (2009-10)**

	<b>Clackamas</b>	<b>Multnomah</b>	<b>Washington</b>	<b>Total</b>
Albanian	*	52	45	97
Amharic	15	163	50	228
Arabic	148	501	527	1,176
Baluchi	6	6	17	29
Bengali	7	6	90	103
Bosnian	20	190	67	277
Chinese	487	1,646	1,035	3,168
Chuukee	43	556	160	759
Dutch/ Flemish	10	17	27	54
English	56,021	77,572	68,684	202,277
French	36	86	63	185
German	58	68	90	216
Gujarati	13	10	74	97
Hebrew	9	13	48	70
Hindi	16	158	219	393
Hmong	118	752	159	1,029
Hungarian	10	19	15	44
Indonesian	*	19	32	51
Italian	13	24	7	44
Japanese	88	167	546	801
Korean	316	123	829	1,268
Kurdish	0	27	94	121
Lao	95	368	120	583
Marshallese	6	8	109	123
Persian	48	96	226	370
Romanian	222	1,010	158	1,390
Russian	1,698	4,126	498	6,322
Samoan	47	110	15	172
Sign Language	13	16	7	36
Somali	0	1,212	632	1,844
Spanish	9,492	25,051	31,256	65,799
Tagalog	107	281	328	716
Ukrainian	559	1,369	55	1,983
Vietnamese	590	4,218	1,564	6,372
All other languages	381	2,207	1,667	4,255
Other Languages(ODE)	159	1,798	411	2,368
<b>Total</b>	<b>70,851</b>	<b>124,045</b>	<b>109,924</b>	<b>304,820</b>

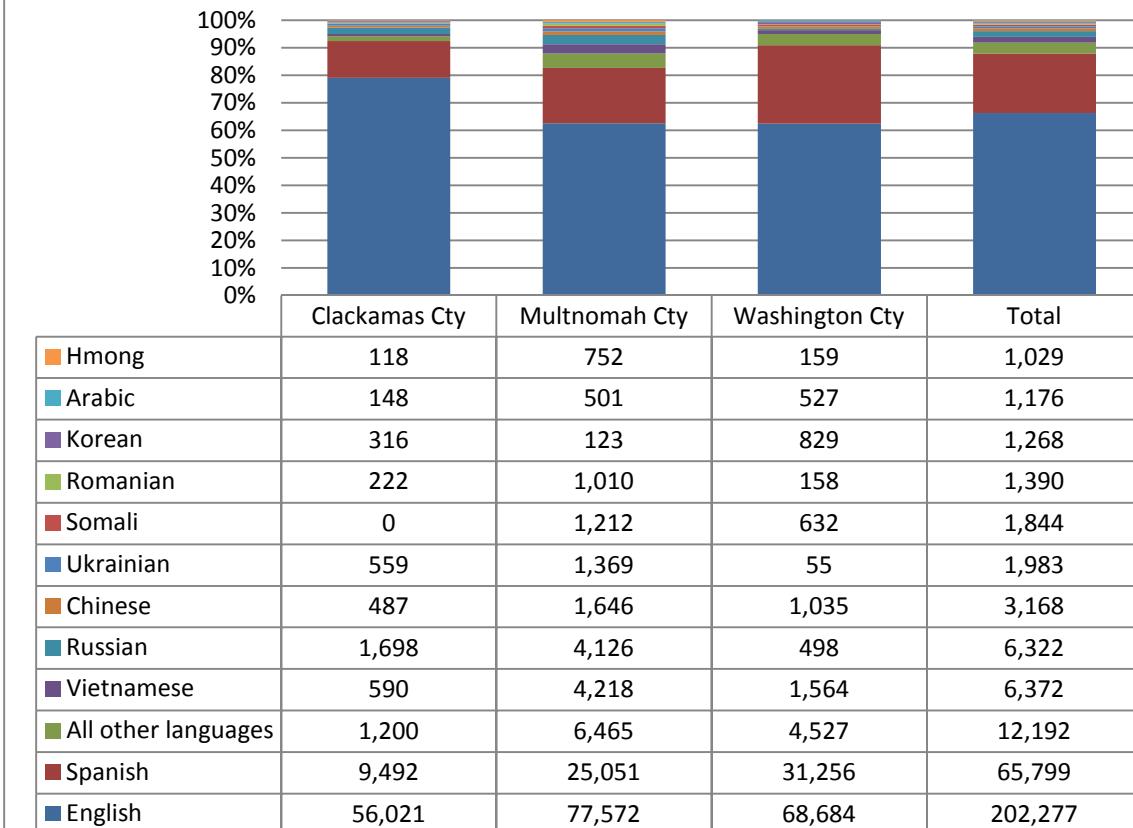
The following two tables show graphically the top languages with over a thousand students in ascending numerical order and the percentages they represent in the enrolled student population in the district.

**Table 3. K-12 Students by First Language**

Source: OR Dept. of Education 2009-2010

Languages listed for over 1,000 total

n=304,820

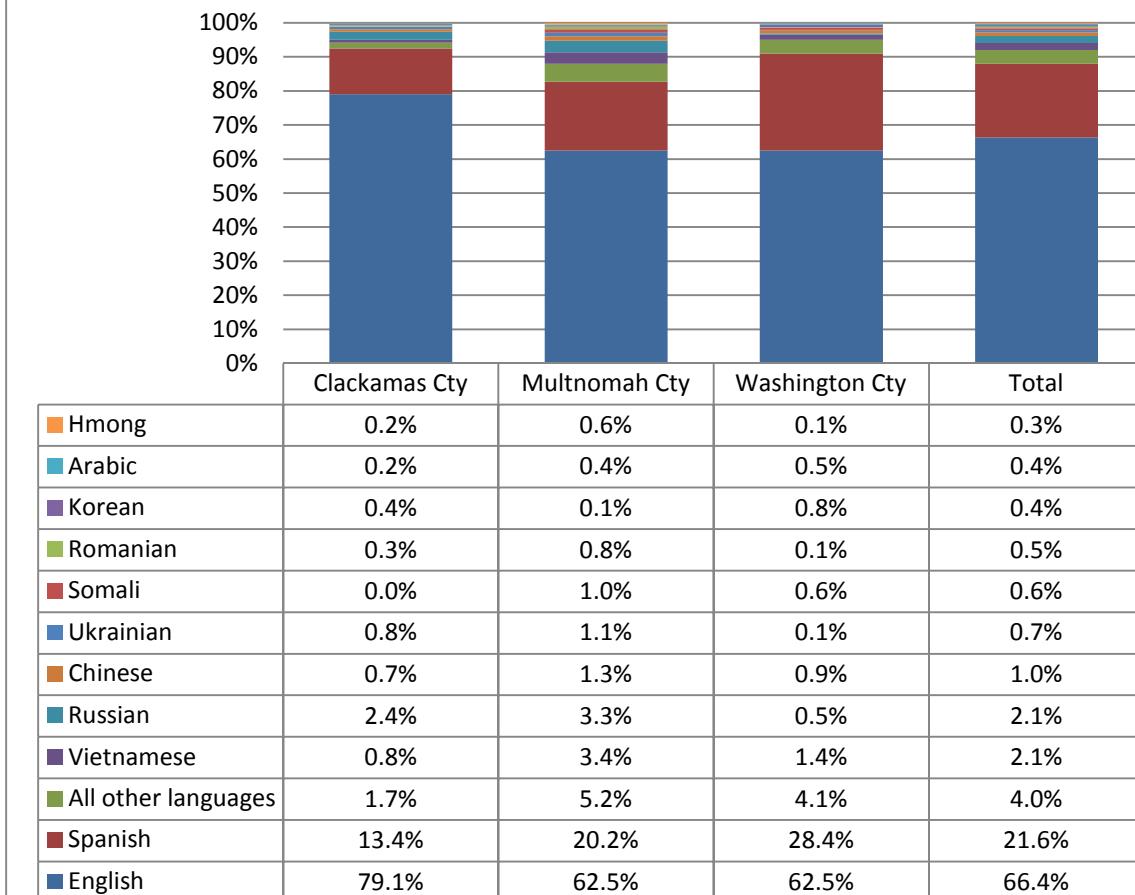


**Table 4. K-12 Students by First Language**

Source: OR Dept. of Education 2009-2010

Languages listed for over 1,000 total

n=304,820



As shown on the language distribution maps the language diversity in the tri-county area is heavily concentrated in Spanish, Slavic Languages and Asian Languages with Spanish, by far, the largest language group as noted also in the analysis by Portland State University of the Oregon Education enrollment data. PSU also points out that language diversity tends to be concentrated in specific parts of each county and is not uniformly present in all areas. Some Districts reflect higher concentrations of specific languages than other districts. Districts in the region vary significantly in the presence of language diversity

The top four languages in the Oregon Department of Education correspond with those identified by TriMet through the analysis of Census (Spanish, Vietnamese, Russian, and Chinese). Four additional languages (Arabic, Romanian, Korean, and Ukrainian) also form part of the 11 LEP languages identified in the Census data. Japanese and Tagalog identified as LEP languages in the Census do not figure as prominently in the school enrollment records and Mon-Khmer, Cambodian is not identified in the school

records. TriMet had 5 requests for language assistance by Cambodian in a seven month period this past year. Two languages show up more prominently in the school records and do not come up to the LEP “safe harbor” threshold are Hmong and Somali. Of these last two only Somali individuals have requested language assistance through TriMet customer service line as documented in Factor 2. This represents a higher number of requests for language assistance than Vietnamese, Chinese, and Korean which show up in greater numbers in the US Census data. The top five languages identified using Census ACS 2006-2010 5 year sample data mirror the top five languages identified in the previous Four Factor analysis performed by TriMet using 2000 Census data. These top five languages comprise 80.14% of the total LEP population.

## **Factor 2: The frequency of contact with which LEP persons come in contact with a TriMet program, activity, or service.**

To conduct Factor 2, this assessment focused on information generated by agency personnel, technological systems and survey research. In the context of Factor 2, “relevant programs, activities and services provided” were defined as ridership, fares and customer information as these are the means by which people use or inquire about transit services and programs.

### **Call Center Data**

The following data by the agency's Customer Service staff for this update LEP Needs Analysis. In looking at the data provided for the seven month period 12/1/11 thru 6/30/12 there were 2,802 requests for language assistance. This is in the context of customer service staff answering on average 15,697 calls per month. Table 5 provides a listing of languages in which the service was provided. It presents those languages most often requested. As shown, Spanish language assistance continues to constitute the majority (65 %) of the requests as was the case in TriMet's analysis conducted using 2005 data. Language assistance can be accessed over the telephone with interpreters available for 176 languages.

**Table 5. Call Center Data**

Call Center	238-RIDE	Medical Transportation Program	LIFT contracted paratransit service	Total
<b>Total Language Assistance</b>	831	1,608	369	2,808
Spanish	633	920	284	1,837
Russian	14	483	12	509
Somali	4	73	22	99
Vietnamese	13	35	37	85
Arabic	7	46	4	57
Chinese (Mandarin)	11	29	2	42
Chinese (Cantonese)	10	22	8	40
Other*	139			139

NOTE: ATP includes LIFT, medical transportation for Medicaid-eligible riders in Oregon Health Plan, and oversees funding assistance provided by TriMet to community based volunteer and agency transportation through the Ride Connection program.

\*Other Language assistance was also provided to the following languages: Korean (31), Nepali (30), Farsi (23), Romanian (9), French(7), Burmese (5), Cambodian (5), Japanese (4), Swahili (4), Hindi (3), Oromifa (3), Bosnian (2), Karen (2), Thai (2), Amharic (1), Chuukese (1), Dutch (1), Kurdish (1), Polish (1), Portuguese (1), Shangainese (1), and Ukrainian (1).

## Automated information

TriMet's number, 503-238-RIDE, asks callers if they want information in Spanish. From there, they can choose arrival estimates or schedules at a specific stop, or fare information, or they can choose to speak to a representative. The automated system logs which options were selected including how many callers requested information in Spanish. So far this year, out of more than 10 million calls, 456,157 requested Spanish. The percentage of calls by Spanish speakers has increased steadily over the past several years:

<b>Table 6. Call-a-bus log files</b>		
<b>Year</b>	<b>Spanish</b>	<b>English</b>
2006	0.1%	99.9%
2007	0.1%	99.9%
2009	0.5%	99.5%
2010	1.9%	98.1%
2011	3.5%	96.5%
2012	4.2%	95.8%

## TriMet Website

The TriMet website provides basic how to ride information in five languages (Spanish, Vietnamese, Chinese, Russian, and Korean). All these pages also have TriMet's Title VI notification and complaint procedures and form in the preceding languages as well as in English. A how to ride video in Spanish, Vietnamese, Chinese, Russian, and Korean is also posted in the website. As TriMet has prioritized resources on serving the largest group in the LEP population, the Spanish web pages have more extensive content in addition to a Trip Planner in Spanish. The following table shows the page views for the period June 1, 2011 to May 31, 2012. It should be noted that customers translate other pages of the site using third party services, such as Google translate or Microsoft translator and these are not trackable. However, the translated page views give a good indication of the balance of demand for those languages provided.

**Table 7. TriMet Website FY 2012 Translated Page View Summary**

<b>Language</b>	<b>Quantity</b>	<b>Percent</b>
Spanish	7,067	58%
Korean	1,860	15%
Chinese	1,592	13%
Vietnamese	844	7%
Russian	805	7%
Total	12,168	100%

## **Bus Operator Surveys**

As part of the TriMet LEP (Limited English Proficiency) program's effort to evaluate access to transit for all members of the community, intercept surveys were conducted with bus operators. Since bus operators are often the first contact LEP passengers have with TriMet, this research was designed to find:

- How often operators encounter LEP passengers
- How operators communicate with LEP passengers
- Solicit their ideas for better ways to communicate with LEP passengers

To this end, TriMet's Marketing Information Department conducted a total of 203 operator interviews at Center Street Garage during the fall 2005 schedule sign-up. Another survey was conducted during the fall 2011 schedule sign-up with 209 operators. During both survey periods interviewing times were spread evenly throughout the two-week sign-up process to ensure operators with varying lengths of service were represented.

Relevant to our assessment for Factor 2, operators were asked which routes they had driven in the past year, where they had most often encountered LEP passengers asking for information and how often. Operators encountered LEP passengers on about 60% of the bus routes in the system. Routes most often mentioned in both 2005 and 2011 were:

- Line 57- TV HWY/Forest Grove. This route connects Forest Grove, Cornelius, Hillsboro, Aloha, and Beaverton, the area with the region's highest concentration of Spanish speakers.
- Line 12- Barbur. This is a long route with one end in Sherwood, another area with a large Spanish speaking population.
- Line 4-Division, has one end of the route in Gresham, an area with a high concentration of Spanish speakers, as well as Indo-Europeans and Asian/Pacific Islanders.<sup>1</sup>
- Line 72-Killingsworth/82<sup>nd</sup> was a top mention in 2011. This route has one end in Gresham, again an area with a high concentration of Spanish speakers, as well as Indo-Europeans and Asian/Pacific Islanders.<sup>1</sup> The Green Line MAX, which opened in 2010, connects to Line 72.

As for the number of times LEP passengers asked for information, there was a great range depending upon the route. For some routes information requests were only once a week, for others it was as high as 20 times/day.

## **Staff survey**

An on-line survey was sent to 548 TriMet staff members in July 2012. The purpose of the survey was to ask employees how they communicate with customers who speak limited English. A response rate of 28% was obtained. The results of this survey point out that;

- Three in ten staff respondents speak another language besides English, with about two-thirds of those giving Spanish as the language spoken.
- Three quarters said they had contact with LEP customers with about half saying their contact is less than once a month.

## Conclusion

Factor 2 Analysis showed that there is frequent contact by LEP persons with TriMet personnel. Customer service language assistance data, webpage views, automated calls (call a bus), and employee surveys also show high levels of contact between LEP individuals and TriMet services. And as will be shown, discussions with LEP individuals and representatives of community based organizations providing services to LEP individuals attest to the importance of improving the TriMet services to provide access to LEP customers. The data shows that Spanish speaking LEPs continue to have the most frequent contact with TriMet services. This fact might be due to a couple of reasons: This population represents the greatest percentage of all LEPs. TriMet has emphasized improving access for this particular community. As seen from the data, LEP's access information and services differently (website access vs. telephone). This is a reminder that one approach will not work for all groups.

### **Factor 3: The importance to LEP persons of your program, activities, and services**

To address Factor 3, Tri Met staff designed and conducted community “roundtable discussions” to find out how often LEP customers rode TriMet, for what purposes, and problems encountered. In the context of Factor 3, the agency’s “most critical services” were defined as **Fares and Tickets, Routes and Schedules, and Safety and Security**. These areas were chosen because language barriers in these areas could:

- a. limit a person’s ability to gain the *full benefit* from services, or
- b. in the areas of safety and security – place a person in physical danger.

Four roundtables were initially conducted in 2005– two in Spanish, one in Russian, and one in Vietnamese. Discussions were led by a member of each community and interpreters were available for TriMet staff. Results from these LEP community roundtables indicated that:

- TriMet programs and services were very important to LEP community members as most said they were transit dependent<sup>1</sup> and relied on transit for almost all of their travel in the region (work, school, visiting, shopping, etc.)
- The primary frustrations LEP customers experienced using TriMet were consistent with those experienced by other TriMet riders such as: late buses, pass-ups, concerns for personal safety, rude employees, fares, confusion over zones boundaries, and transfers. However, language barriers inhibited satisfactory resolution of LEP customer issues.
- Most participants were unaware of the language services TriMet has to offer. Thus, few had ever made use of those services.
- Because many LEP customers were new to the country and/or don’t understand English well, they relied heavily on family, friends and trusted community organizations to help them adapt and find their way.

In 2008, the LEP program convened key community leaders working with Spanish speaking LEP constituents to review TriMet information pieces, icons and technology offerings to determine usefulness to LEP populations. This group was facilitated by TriMet’s LEP outreach coordinator. The group consisted of 21 participants representing the following organizations: Latino Network, Victory Outreach Community Services, Centro Cultural of Washington County, Ministerio Hispano St. Anthony Church, Santos Futbol Club, El Programa Hispano, Proyecto Unica, Multnomah County Library-Latino Outreach, MEChA, Padres Hispanos Escuelas Públicas de Portland, Instituto de los Mexicanos en el Exterior (IME), Centro Baltazar Ortiz, Hacienda CDC, and Multnomah County Sun Schools. As a result of the input and continued involvement of the group as “community advisors”, major improvements were made to printed materials, web content, and customer service telephone assistance.

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<sup>1</sup> Transit Dependent: I don’t have a car available to use, or I can’t drive / don’t know how to drive

Again in 2011 four focus groups were held. This time they were all conducted in Spanish and held at locations in Clackamas, Washington, and Multnomah counties. The sessions were hosted by community organization and organized by an independent contractor. A moderator facilitated the groups and participants spoke in Spanish while staff from TriMet observed and listened to the interactions through the use of a simultaneous interpreter. Most participants (as was the case in 2005) said they were dependent and relied on transit for almost all their travel in the region. In addition, there was limited knowledge of language assistance that could be accessed by calling 503-238-RIDE. Most participants showed a high level of awareness of the informational channel cards in Spanish found in TriMet's bus and rail vehicles. Other findings were similar to those identified in 2005. LEP customers who are new to the area and/or don't understand English well, or have limited literacy in their own language rely heavily on family, friends and trusted community organizations to help them adapt and find their way.

## **Bus Operator surveys**

As noted in Factor 2, part of the TriMet's LEP (Limited English Proficiency) program's effort to evaluate access to transit for all members of the community, intercept surveys were conducted with bus operators. This information can be useful in understanding the third factor as well. To summarize the information summarize on these surveys provided in Factor 2, since bus operators are often the first contact LEP passengers have with TriMet, this research was designed to find:

- How often operators encounter LEP passengers
- How operators communicate with LEP passengers
- Solicit their ideas for better ways to communicate with LEP passengers

To this end, TriMet's Marketing Information Department conducted a total of 203 operator interviews at Center Street Garage during the fall 2005 schedule sign-up. Another survey was conducted during the fall 2011 schedule sign-up with 209 operators. During both survey periods interviewing times were spread evenly throughout the two-week sign-up process to ensure operators with varying lengths of service were represented.

Operators were asked what types of questions were most often asked by LEP passengers. In this open-ended question their top responses were how to get to a destination /building/bus stop (86%), fares (20%), and which bus to take (10%). Between 2005 and 2011 the responses were similar.

When asked how they communicate with LEP passengers, operators mentioned a variety of strategies including asking other passengers for help (41%), using hand gestures/sign language (29%), getting them to write down an address (14%), pointing to fare signs (13%), speaking slowly (12%), alerting them to their stop (12%), using diagrams or maps (11%), and listening closely (11%). In 2011 hand gestures/sign language and getting them to write down address were mentioned more often than in 2005.

Most (83%) of the operators were aware of different materials, services or tools TriMet uses to communicate with LEP passengers. This was significantly higher in 2005 than in 2011 (92% vs. 74%). Materials/services/tools cited included:

- *Paddle with translations* (49%). This was a high visibility item for operators as it stayed on the bus near the driver's seat. It was discontinued before 2005 (it ended up being primarily used to clear farebox jams), but 80% of those in 2005 mentioned it, as compared to 12% in 2011.
- *How to Ride* brochure (23%). For 2005 respondents this was a higher mention than in 2011 (34% vs. 10%).
- *Spanish language channel cards* (17%). This was a new item and therefore was not mentioned in 2005.
- *Farebox Spanish* (16%) a booklet containing key phrases in Spanish. 2005 had higher mentions than 2011 (22% vs. 8%).
- *Language translation at 238-RIDE* (11%). There were lower mentions in 2005 than 2011 (5% vs. 17%).
- *Website* (7%). There were lower mentions in 2005 than in 2011 (4% vs. 10%).
- *Bus/MAX announcements* (7%). Lower mentions in 2005 than in 2011(4% vs. 11%). During the time between 2005 and 2011 Automatic Stop Announcements were installed on many buses which included Spanish language instructions.

When asked if TriMet could do something to help operators communicate with LEP passengers, 62% answered Yes, and offered a number of suggestions such as *language classes at TriMet* (36%), *list of phrases with translations* (16%), *translators on the bus or available so operators could phone TriMet* (11%), and *brochures/schedules/maps in other languages* (8%).

About a third (31%) of the operators interviewed recalled training on how to communicate with LEP passengers. This was higher in 2011 (36%), and significantly higher in 2011 for those who had worked at TriMet for up to one year (91%).

Of those who could recall the training, most could not recall specifics saying only that they had the training when they *first started*. Others mentioned training on how to use the *Spanish tapes/Farebox Spanish* or the *Paddle with Translations*.

Overall 36% of the operators interviewed speak another language at some level, either fluently or some words. There was little difference between 2005 and 2001 in number of operators who spoke another language. Among those who said they spoke another language, most spoke *Spanish or some Spanish* (66%) followed by *German/some German* (19%), *Russian/some Russian* (9%), and *French/some French* (8%). Operators employed with TriMet up to one year had the highest concentration of those who spoke some level of Spanish — 89% in 2005 and 86% in 2011.

## **Staff survey**

As noted in Factor 2, an on-line survey was sent to 548 TriMet staff members in July 2012. The purpose of the survey was to ask employees how they communicate with customers who speak limited English. A response rate of 28% was obtained. The following findings out of that survey are relevant to this assessment in Factor 3.

- For those who have contact, when asked what type of questions are asked by LEP customers, the most frequent mentions were: how to get to their destination (65%), which bus/MAX do I need (56%), what fare to pay (34%), schedule questions (29%), and how to use the ticket vending machine (28%).
- Seventy-two percent said they were aware of materials, services, or tools that TriMet uses to communicate with LEP customers.

## **Conclusions and Recommendations**

1. TriMet is an important service for the discussion group participants, as evidenced by their transit dependence, ridership frequency, and variety of transit trips taken.
2. For LEP customers, resolving customer concerns is hindered by the language barriers between them and agency personnel.
3. The limited awareness of the agency's multilingual services among the target audiences highlights the need improve and find new venues for promoting these services.
4. Reliance on trusted sources for information underlines the importance of growing and maintaining personal relationships within the LEP communities.
5. Initiating, maintaining, and strengthening relationships with community organizations that serve LEP populations is important because these provide help to new arrivals as they adapt and find their way in the region.
6. Results for both the operator and staff survey point to the importance of increasing staff awareness of the materials and communication tools available to improve the delivery of service to LEP customers. These results also highlight the importance of public transportation to LEP persons and the role that training and bilingual capacity play in the effectiveness of our front line staff working more closely with LEP customers.

#### **Factor 4: The resources available to TriMet and costs to provide LEP assistance.**

To conduct factor 4, TriMet reviewed the language assistance services it is providing and estimated costs for each. Results from the review show that:

**Table 8. LEP Spending FY 08-12\***

<b>Item</b>	<b>Total</b>
Interpreter service	\$165,920
Translation	\$12,569
Channel Cards	\$19,178
Brochures/literature	\$29,435
How-To-Ride DVD	\$12,444
Civil Rights Signage	\$774
Newspaper Ads	\$7,979
Other Ads (bench/yellow pages)	\$9,307
FTA Training	\$2,258
Market Research	\$49,341
Other (conference sponsor/HR hiring tool)	\$1,475
<b>Total</b>	<b>\$310,681</b>

\* Not including staff labor

Language assistance costs incurred through the provision of telephone interpretation have remained constant at about \$35,000 over the last few years. Similarly, the cost of translation of providing over the few years has been as well as printing of materials in various languages.

Major expenses have to do with marketing research. In addition, the development of a how to ride video that was then dubbed in Spanish, Vietnamese, Chinese, Russian, and Korean required hiring of voice talent and editing of how to ride videos in the targeted language which was a significant expense. Other major items that have been effective in reaching LEP (Spanish speaking) customers have been informational channel cards in all bus and rail vehicles, and the targeted placement of bench ads in areas identified with high levels of LEP Spanish speaking residents.

The table above shows resources that have been available for LEP activities. It should be noted that slightly less than half of these expenses have been covered thanks to an FTA grant to develop the LEP program. What is not accounted for in this table is the staff costs incurred as work to provide access to LEP individuals is undertaken by staff assigned to operations, customer information services, creative services, communications, capital projects. The agency strives to find creative ways to address the diverse customer base it serves, in particular LEP riders.

#### **Conclusion**

TriMet is committed to full compliance with Title VI and Executive Order 13166 to provide meaningful access to programs, services and benefits for persons with Limited English Proficiency. This updated

Four Factor Analysis will guide TriMet efforts to retain successful program and activities designed to meet the language needs of LEP populations, and identify new areas of focus to further the agency's goal of providing LEP customers with meaningful access to TriMet programs and services.

## ATTACHMENT H: LEP EXAMPLE

### Rockwood, Civic Drive MAX Station Construction To Begin in May

In May, TriMet will begin construction at the Rockwood /E 188th Ave MAX Station and the future Civic Dr Station in Gresham as part of a number of station improvements under way along the Eastside MAX Blue Line. The improvements include:

#### Rockwood/E 188th Ave MAX Station Improvements

Redesign and construction at the Rockwood/E 188th Ave MAX Station will be done in concert with the Gresham Redevelopment Commission's Rockwood in Motion infrastructure improvement projects in the Rockwood triangle area. Station improvements will include:

- Moving both platforms to the west side of 188th Ave to improve safety and comfort while creating a sense of place
- Installation of new MAX shelters with transparent windscreens to shield riders from the wind and rain
- New ticket vending machines and platform furnishings
- Public art created specifically for the station
- Pedestrian crossing safety improvements
- Improved lighting and security cameras

The Rockwood Station improvements are funded by ConnectOregon II and the Gresham Redevelopment Commission. Construction will begin in May 2010, with the refurbished station scheduled to open in February 2011. To learn more about Rockwood in Motion, visit [GreshamOregon.gov/Rockwoodinmotion](http://GreshamOregon.gov/Rockwoodinmotion)

#### New Civic Dr MAX Station

Construction of the new MAX station at Civic Drive between Burnside and Division streets will include:

- Pedestrian crossing enhancements
- New shelters
- New ticket vending machines and platform furnishings
- Interactive public art

Construction will begin in May 2010, with the station scheduled to open in fall 2010. The Civic Dr Station design and construction is funded by the Federal Transit Administration and Metro.

#### Eastside MAX Station Improvements

MAX stations between NE 82nd Ave and Cleveland Ave are in the process of receiving numerous improvements, including:

- Pedestrian crossing safety improvements
- Access control and illumination improvements at Gresham Central
- Bike locker replacement
- Station repainting

These improvements are scheduled to be completed during summer 2010. Eastside MAX Station Improvements are funded by grants from the American Recovery and Reinvestment Act.

#### Receive email updates

To receive regular updates via email, sign up at [trimet.org/eastside](http://trimet.org/eastside). For more information, please contact TriMet Community Affairs at 503-962-2150.



### La Construcción de la Estación MAX de Rockwood y Civic Drive Dará Inicio en Mayo

En el mes de mayo, TriMet comenzará la construcción en la Estación MAX de Rockwood /E 188th Ave y la futura Estación de Civic Drive en Gresham, como parte de las mejoras que ya están en progreso en las estaciones a lo largo de la Línea Azul MAX de Eastside. Las mejoras incluyen:

#### La Estación MAX de Rockwood/E 188th Ave

Se realizará el rediseño y construcción de la Estación MAX en Rockwood/E 188th Ave conjuntamente con los proyectos de mejoramiento de infraestructura de Rockwood en Acción de la Comisión de Renovación de Gresham en el área triangular de Rockwood. Entre las mejoras que se llevarán a cabo están:

- Trasladar ambas plataformas hacia el lado oeste de la Avenida 188, tanto para mejorar la seguridad y comodidad como para crear un sentido de orientación
- Instalar nuevas paradas cubiertas MAX con protectores transparentes para proteger a los pasajeros del viento y la lluvia
- Nuevas máquinas vendedoras de boletos y mobiliario de plataforma
- Arte público creado específicamente para la estación
- Mejorar la seguridad en los cruces peatonales
- Instalar mejor iluminación y cámaras de seguridad

Las mejoras a la Estación de Rockwood están siendo financiadas por ConnectOregon II y la Comisión de Renovación de Gresham. La construcción dará inicio en mayo 2010 con la estación renovada lista para abrir sus puertas en febrero 2011. Para más información acerca de Rockwood en Acción, visite [GreshamOregon.gov/Rockwoodinmotion](http://GreshamOregon.gov/Rockwoodinmotion)

#### La Nueva Estación MAX de Civic Dr

La construcción de la nueva estación MAX en Civic Drive entre las calles Burnside y Division, incluirá:

- Mejores cruces peatonales
- Nuevas paradas cubiertas
- Nuevas máquinas vendedoras de boletos y mobiliario de plataforma
- Arte público interactivo

La construcción comenzará en mayo 2010 con la estación lista para abrir sus puertas en el otoño del mismo año. El diseño y la construcción de la Estación de Civic Dr están financiados por la Administración Federal de Tránsito y Metro.

#### Mejoras a la Estación MAX de Eastside

Las estaciones MAX entre NE 82 Ave y Cleveland Ave ya están en proceso de modernización para mejorar:

- La seguridad de los cruces peatonales
- El control del acceso y la iluminación en Gresham Central
- Reemplazar los compartimientos para bicicletas
- Pintar nuevamente la estación

Estas mejoras están programadas para terminar durante el verano del 2010. Las mejoras de la Estación MAX de Eastside están siendo financiadas por subsidios de la Ley de Reinversión y Recuperación Americana.

#### Actualícese por correo electrónico

Si desea actualizarse por medio de su correo electrónico (en Inglés), regístrate en [trimet.org/eastside](http://trimet.org/eastside). Para mayor información, favor comunicarse con TriMet al 503-962-7433.

ATTACHMENT I: SUBRECIPIENT GUIDE TO TITLE VI COMPLIANCE

# The Subrecipient's Guide to Title VI Compliance

**Revision Table**

Version	Description	Date
1	Created	8/2/13

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## **Introduction**

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An entity receiving federal funds, either directly from the Federal Transit Administration (FTA) or TriMet, must not discriminate based on race, color, national origin, religion, sex, sexual orientation, marital status, age or disability in accordance with applicable law.

This guide addresses discrimination based on Title VI of the 1964 Civil Rights Act. Title VI states, “No person in the United States shall, on the grounds of race, color, or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

If a subrecipient is found in violation of Title VI TriMet (and subrecipient) may lose its federal funding. FTA primary recipients and subrecipients of FTA funds are required to comply with all applicable provisions of FTA Circular 4702.1B “*Title VI Requirements and Guidelines For Federal Transit Administration Recipients*” (“Circular”). While this Subrecipient Guide to Title VI Compliance sets forth general requirements of the Circular, it is intended to be a summary of those general requirements, and not exhaustive. Subrecipients are responsible for reviewing and ensuring compliance with all applicable Circular requirements.

## **TriMet Responsibilities**

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

It is important to note that if a subrecipient is not in compliance with Title VI then TriMet is also not in compliance. If a subrecipient is not in compliance with Title VI regulations TriMet will work with the subrecipient to ensure compliance. This includes providing data, information, guidance, and support for the full development and formal adoption of the subrecipient Title VI plan.

To track Title VI compliance TriMet will:

- Document subrecipient compliance with the general requirements.
- Collect and maintain subrecipient Title VI program documents on a designated schedule.
- Forward subrecipient Title VI information as requested by the FTA.

## **Subrecipient Responsibilities**

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If any of your programs or activities receives federal funding then all of your programs and activities must comply with Title VI. Any agency receiving federal funds either directly from FTA or indirectly through TriMet or both, must:

- Ensure that the level and quality of public transportation service is provided in a nondiscriminatory manner;
- Promote full and fair participation in public transportation decision making without regard to race, color, or national origin;
- Ensure meaningful access to transit-related programs and activities by persons with limited English Proficiency;
- Prepare and submit a Title VI Program; and

- Prepare an annual Title VI Report.

## Title VI Program

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Subrecipients must submit a Title VI Program to TriMet within 30 days of their grant award (grants awarded after September 1, 2013) and every three years after initial submission on April 30<sup>th</sup>.

The Title VI program consists of:

- A. Title VI Public Notice
- B. Title VI Complaint Procedure
- C. Title VI Complaint Form
- D. Transit-related Title VI Complaints, Investigations, and Lawsuit List
- E. Public Participation Plan
- F. Language Assistance Plan
- G. Minority Representation Table

If constructing a facility the Title VI Program must also include:

- H. Title VI Facility Location Equity Analysis

If providing fixed route service, the Title VI Program must also include:

- I. Fixed Route Service Standards
- J. Fixed Route Service Policies

## Annual Title VI Report

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In addition to the triennial Title VI Program certain components must be provided to TriMet on an annual basis. By April 30<sup>th</sup> each year subrecipients must submit the following documents to TriMet:

- I. Transit-related Title VI Complaints, Investigations, and Lawsuit List
2. Public Participation Plan
3. Title VI Facility Location Equity Analysis (if constructing a facility)
4. Fixed Route Service Standards (if providing fixed route service)

## Subrecipient Title VI Program and Report Details

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Subrecipients that provide demand response service, including vanpools, general public paratransit, ADA complementary transit, and nonprofits that receive 5310 funds solely to serve their own clientele (i.e. closed door service) are only required to submit a Title VI Program and annual Title VI Report. The following sections describe the components of a Title VI Program.

### Public Notice

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Subrecipients must inform customers and the public of their rights under the Title VI regulations by posting the Title VI Notice. If you have LEP requirements the notices must be posted in the other language(s) as well.

The public notice must include:

- A statement that the agency operates programs without regard to race, color, or national origin.
- Information on how to request additional; information about the agencies Title VI obligations. This includes how to file a complaint and the location of the complaint form.

- Information on how to request Title VI information in another language.

The notice must be posted in the following locations:

- Agency website
- Agency public areas (reception, public meeting rooms, etc.)

Best practice guidance also suggests that posting or printing in other areas such as:

- Vehicles (buses, vans, rail, cars)
- Transit Shelters and Stations
- Ride Guides
- Bus Schedules

### ***Public Notice Q&A***

**Q1:** Can the notice include other protected classes (religion, age, gender, non-disability, etc.)?

**A1:** Yes, as long as race, color, and national origin are included.

**Q2:** Our agency has a non-discrimination policy, does this cover Title VI?

**A2:** It depends. The policy, procedures, and/or program must specifically prohibit discrimination based on race, color, and national origin to include Title VI protections. Further, many nondiscrimination policies are personnel related and a Title VI the program must be for the public to use.

### Complaint Procedure

Subrecipients must have a clear and consistent procedure for responding to customer complaints on Title VI issues. If you have LEP requirements the notices must be posted in the other language(s) as well.

The procedure must be made available upon request and should include:

- An explanation of which specific issues are covered by the procedure
- How to file a complaint (including timelines and access to a complaint form)
- Where to submit the complaint
- How the agency will respond to the complaint (including timelines)
- How the complainant will be informed of the investigation results (if applicable)
- Notice that the complainant may file the complaint directly with the FTA (including FTA contact information)
- An internal system or log for tracking the Title VI complaints (including issue description, dates, findings, etc.)
- How language access will be provided

The complaint procedure must be posted on the agency website and made available in hard copy at the main office.

## ***Complaint Procedure Q&A***

**Q:** Our agency has a discrimination complaint procedure; can the same procedure be used for Title VI?

**A:** Yes. In the section that identifies the specific issues that are covered by the procedure race, color, and national origin must be included.

### **Complaint Form**

Subrecipients must provide a customer complaint form. If you have LEP requirements the notices must be posted in the other language(s) as well. The form must include fields for:

- Complainant's name and contact information
- Identification of the Title VI protected class(es) (race, color, national origin) involved in the complaint
- Date(s) of the alleged discrimination
- Explanation of the alleged discriminatory act or behavior

The complaint form must be posted on the agency website and made available in hard copy at the main office.

## ***Complaint Form Q&A***

**Q:** Our agency has a discrimination complaint form; can the same form be used for Title VI?

**A:** Yes. In the area where the protected class(es) are identified there must be an area to identify race, color, national origin. Additionally, the same form can be used if the alleged discrimination covers multiple protected classes.

### **Transit-related Title VI Complaints, Investigations, and Lawsuit List**

Subrecipients must maintain a list or log of all transit related Title VI complaints, investigations, and lawsuits. This list must be submitted to TriMet annually by April 30<sup>th</sup>. The list must include dates, summary of allegation(s), status, action(s) taken, and outcome (if resolved).

### **Public Participation Plan**

Subrecipients must provide opportunities to the public to be involved in proposed transportation decisions and must have a written Public Participation Plan explicitly describing proactive strategies, procedures, and desired outcomes of their public participation activities. This plan must be submitted to TriMet annually by April 30<sup>th</sup>.

Simply stated, FTA wants proof that you thought about how to include customers in your decision making process and would like to know how well you executed the plan. The plan can be as simple or complicated as the agency decides and various examples are provided at the end of this document.

Examples of items/methods used in the public participation plan are customer surveys that inform transportation planning, participation in Public Transit-Human Service Coordinated Plan or other local and statewide planning research, outreach methods to local employers, customer satisfaction or needs surveys, or involvement in decision making process of implementing demand or fixed route services.

### ***Public Participation Plan Q&A***

**Q1:** Our agency provides transportation services for clients that are referred by social service agencies – do we need a public participation plan?

**A1:** Yes, but the plan can be as simple as contacting social service agencies and informing them of your program.

**Q2:** Our transportation services start when TriMet services stop to provide transportation from downtown to local area businesses, what would our plan look like?

**A2:** The plan could include outreach to businesses in your area to provide transportation to employees.

### **Language Assistance Plan**

Subrecipients must have a written Language Assistance Plan. Subrecipients must take reasonable steps to ensure meaningful access to benefits, services, information for individuals who are limited English proficient (LEP). To determine if an individual is entitled to language assistance and what services are appropriate the DOT has created an assessment tool – the Four Factor Analysis.

#### **Four Factor Analysis**

1. Demography – What is the number or proportion of LEP persons served and the languages spoken in the service area?
2. Frequency – How often do LEP persons come into contact with the service or program?
3. Importance – How does the program, service, or activity affect people's lives?
4. Resources and Costs – What funding and resources are available for LEP outreach?

The Language Assistance Plan must include the following:

- Results of the Four Factor Analysis, including LEP population(s) served
- Description of how language services are provided, by language
- Description of how LEP persons are informed of the availability of language assistance services
- Description of how the plan is reviewed and updated
- Description of how employees are trained to provide language assistance

#### **LEP Safe Harbor**

The Safe Harbor stipulation was created to provide access to vital written documents to non-English users who because of small numbers may not meet the threshold for providing language access services as identified in the Language Assistance Plan. Safe Harbor requires a written translation of vital

documents (ADA, paratransit eligibility forms, Title VI complaint forms) for each LEP group that meets the threshold (5% or 1,000 individuals, whichever is less).

### ***Language Assistance Plan Q&A***

- Q1: How do I find out what LEP populations we serve?  
A1: The Census provides information online at the following link:  
[http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml  
?refresh=t](http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t). If you need additional demographic information TriMet can assist you.
- Q2: At what point does the agency provide LEP services to populations in our service area?  
A2: If specific LEP populations exceed 5% or 1,000 individuals the agency must provide written document translation services.

### **Minority Representation Table**

Subrecipients with transit-related, non elected planning boards, advisory councils, or committees selected by the subrecipient must provide a table depicting the membership of those organizations broken down by race. Subrecipients must also include a description of efforts made to encourage participation of minorities on these boards, councils, and committees.

### ***Minority Representation Table Q&A***

- Q: We have numerous boards and committees; do we need to collect this data for each?  
A: The table is only required for transportation related boards and committees.

### **Facility Location Equity Analysis**

If a subrecipient is planning to acquire land to construct storage facilities, maintenance facilities, or operations centers they must not discriminate on the basis of race, color, or national origin, against persons who may, as a result of the construction, be displaced from their homes or businesses.

During the planning phase the subrecipients must perform an equity analysis prior to site selection to ensure that the location is selected in a non-discriminatory manner. If the selected location results in disparate treatment the subrecipient must show substantial legitimate justification for locating the facility there and evidence that there are no alternative locations.

## ***Equity Analysis Q&A***

- Q1: Only part of the facility is being funded with FTA funds, do we need to perform an equity analysis?
- A1: Yes, if any FTA funds are used in the construction of storage facilities, maintenance facilities, or operations centers an equity analysis must be performed prior to site selection.
- Q2: Site planning was conducted years before we knew we would be awarded FTA funds for a portion of the operation center construction, how would we perform an equity analysis if we are starting construction?
- A2: FTA Circular 4702.1B was in effect October 2012 and the requirement did not exist in previous FTA circulars; as a result the equity analysis is required for projects that began after October 2012. If the planning phase started after October 2012, please contact TriMet so we can help you mitigate this issue.

### **Fixed Route Service Standards**

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Subrecipients providing fixed route service must determine frequency of services, age and quality of vehicles assigned to routes, quality stations serving different routes, or the location of routes in a non-discriminatory manner. This must be submitted to TriMet annually by April 30<sup>th</sup>.

Service standards include the following:

- Vehicle load for each mode
- Vehicle headway for each mode
- On time performance for each mode
- Service availability for each mode

### **Fixed Route Service Policies**

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Subrecipients providing fixed route service must determine the distribution of transit amenities or vehicle assignments for each mode in a non-discriminatory manner. Subrecipients must develop written policies for transit amenities and vehicle assignments. Although there may be different policies for different modes of transportation, amenities policies address how amenities are distributed in a way that ensures that all riders have equal access to amenities. Vehicle assignment policies must be based on vehicle and/or service type.

## **Definitions**

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Amenities	items of comfort, convenience, and safety which are available to the general riding public such as seating, shelters, canopies, signs, maps, schedules, escalators, elevators, and waste receptacle.
Color	Skin color or complexion
Demand Response System	Any non-fixed route system of transporting individuals that requires advanced scheduling including services provided by public entities, non-profits, and private providers. An advance request for service is a key characteristic of demand response service.
Designated Recipient	Any entity designated by the chief executive officer of a state, responsible local officials, or publicly owner operators of public transportation to receive and apportion grant funds made by Congress or FTA.
Direct Recipient	Any public agency authorized to receive program funds directly from FTA.
Discrimination	An intentional or unintentional action through which a person, solely because of race, color, national origin, religion, or gender has been subjected to unequal treatment under a program or activity receiving federal financial assistance.
Disparate Impact	A facially neutral policy or practice that disproportionately affects members of a group identified by race, color, or national origin, where the recipient's policy or practice lacks a substantial legitimate justification and where there exists one or more alternatives that would serve the same legitimate objectives but with less disproportionate effect on the basis of race, color, or national origin.
Disparate Treatment	Actions that result in circumstances where similarly situated persons are intentionally treated differently (i.e., less favorably) than others because of their race, color, or national origin.
Fixed Route	Public transportation service provided in vehicles operated along pre-determined routes according to a fixed schedule.
Limited English Proficient	Persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English.
Minority Persons	Include the following: (1) American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment. (2) Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

- (3) Black or African American, which refers to people having origins in any of the Black racial groups of Africa.
- (4) Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- (5) Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

Minority Population	Any readily identifiable group of minority persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient populations (such as migrant workers or Native Americans) who will be similarly affected by a proposed DOT program, policy, or activity.
National Origin	A person's, or his or her ancestors, place of birth. Can be viewed as the heritage, nationality group, lineage, or country of birth of the person or the person's ancestors before their arrival in the United States. People who identify their origin as Hispanic, Latino, or Spanish may be of any race.
Race	A social classification of people which includes, at a minimum, White, Black or African American, American Indian or Alaska Native, Asian, Native Hawaiian or other Pacific Islander.
Subrecipient	An agency receiving grant funds through TriMet or another designated recipient (e.g. Oregon Department of Transportation Public Transportation Division).

## **Internet Resources**

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FTA Circular 4702.1B (October 1, 2012) [http://www.fta.dot.gov/legislation\\_law/12349\\_14792.html](http://www.fta.dot.gov/legislation_law/12349_14792.html)

DOT LEP Guidance [http://www.justice.gov/crt/lep/guidance/guidance\\_Fed\\_Guidance.html#DOT](http://www.justice.gov/crt/lep/guidance/guidance_Fed_Guidance.html#DOT)

TriMet Civil Rights <http://www.trimet.org/about/titlevi.htm>

## **TriMet Contact**

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Send your Title VI materials to:

Julie Ratcliff, Grant Compliance Analyst  
1800 SW First Ave, Suite 300  
Portland, OR 97201  
[ratclifj@trimet.org](mailto:ratclifj@trimet.org)  
(503) 962-4819

## **Sample Documents**

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The samples are provided for guidance purposes only. Contact TriMet for any questions or assistance with your agency documents.

### Title VI Notice Sample

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#### **Title VI Notice [Subrecipient]**

[Subrecipient] operates its programs with regard to race, color, national origin, religion, sex, sexual orientation, marital status, age or disability in accordance with applicable laws, including Title VI of the Civil Rights Act of 1964 and ORS Chapter 659A.

To request additional information on Tualatin Shuttle's Title VI non-discrimination requirements, or if any person believes that they have been aggrieved by an unlawful discriminatory practice under Title VI or other applicable law and would like to file a complaint, contact us at [subrecipient phone] or email [subrecipient email]. For more information visit [subrecipient Title VI website].

A complaint may also be filed directly with the Federal Transit Administration: Office of Civil Rights, Attn: Title VI Program Coordinator, East Building, 5<sup>th</sup> Floor-TCR, 1200 New Jersey Ave., SE, Washington, DC 20590.

If information is needed in another language contact [subrecipient language services]

The last sentence should be included in any language(s) spoken by LEP populations meeting the Safe Harbor threshold.

## Title VI Complaint Procedure Sample

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Any person who believes he/she has been aggrieved by an unlawful discriminatory practice on the basis of race, color or national origin by [subrecipient] may file a complaint by completing and submitting [subrecipients] Title VI Complaint form.

[Subrecipient] investigates complaints received no more than 180 days after the alleged incident. [Subrecipient] will process complaints that are complete. Once a completed complaint is received, [Subrecipient] will review it to determine jurisdiction. The complainant will receive an acknowledgement letter informing her/him whether the complaint will be investigated by [subrecipient].

[Subrecipient] will generally complete an investigation within 90 days from receipt of a completed complaint form. If more information is needed to resolve the case, [subrecipient] may contact the complainant. Unless a longer period is specified by [Subrecipient], the complainant will have ten (10) days from the date of the letter to send requested information to the [subrecipient] investigator assigned to the case.

If [subrecipient] investigator is not contacted by the complainant or does not receive the additional information within the required timeline, [subrecipient] may administratively close the case. A case may be administratively closed also if the complainant no longer wishes to pursue their case.

After an investigation is complete, [subrecipient] will issue a letter to the complainant summarizing the results of the investigation, stating the findings and advising of any corrective action to be taken as a result of the investigation. If a complainant disagrees with [subrecipients] determination, he/she may request reconsideration by submitting a request in writing to [subrecipients] Director within seven (7) days after the date of [subrecipient's] letter, stating with specificity the basis for the reconsideration. The Director will notify the complainant of his decision either to accept or reject the request for reconsideration within 10 days. In cases where reconsideration is granted, the Director will issue a determination letter to the complainant upon completion of the reconsideration review.

Title VI Complaint Form Sample

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[Subrecipient]

[Subrecipient Address]

**TITLE VI COMPLAINT FORM**

Title VI of the 1964 Civil Rights Act requires that "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 following information is necessary to assist us in processing your complaint. Should you require any assistance in completing this form or need information in alternative formats, please let us know.

Complete and return this form to [subrecipient Title VI complaint address]

1. Complainant's Name: \_\_\_\_\_
2. Address: \_\_\_\_\_
3. City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_
4. Telephone Number (home): \_\_\_\_\_ (business): \_\_\_\_\_  
Electronic Mail Address: \_\_\_\_\_
5. Are you filing this complaint on your own behalf? \_\_\_\_\_. If not, please supply the name and relationship of the person for whom you are complaining:  
\_\_\_\_\_  
Please explain why you have filed for a third party:  
\_\_\_\_\_

Please confirm that you have obtained the permission of the aggrieved party if you are filing on behalf of a third party.\_\_\_\_\_

6. Which of the following best describes the reason you believe the discrimination took place? Was it because of your (check any box that applies):
  - a. Race:
  - b. Color:
  - c. National Origin:
7. What date did the alleged discrimination take place?
8. In your own words, describe the alleged discrimination. Explain what happened and what policy, program, activity or person you believe was discriminatory.
9. Have you filed this complaint with any other federal, state, or local agency, or with any federal or state court? Yes:  No:

If yes, check each box that applies:

Federal agency  Federal court  State agency

State court  Local agency

10. Please provide information about a contact person at the agency/court where the complaint was filed.

Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone Number:

11. Please sign below. You may attach any written materials or other information that you think is relevant to your complaint.

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Complainant's Signature

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Date

## List of Transit Related Title VI Complaints, Investigations, and Lawsuit Sample

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	Date	Summary	Status	Action(s) Taken
<b>Complaints</b>				
1.				
2.				
<b>Investigations</b>				
1.				
2.				
<b>Lawsuits</b>				
1.				
2.				

## Public Participation Plan Sample

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We actively outreach to engage minority and limited English proficient populations in three primary ways.

First, we do direct outreach to program staff at organizations that serve minority and LEP clients (e.g. Immigrant and Refugee Community Organization (IRCO), Native American Youth and Family Center (NAYA), African American Alliance for Home Ownership (AAA), Self Enhancement Incorporated (SEI), Asian and Pacifica Islander Community Improvement Association (APICIA). We meet with these organizations one- on-one to not only make sure they understand our program, but also so we can learn how our program can best serve their clients.

Second, we attend resource events at sites and in areas where minority and LEP populations are present. Some site examples include Schools Uniting Neighborhoods (SUN) family resource events, City of Portland Fix It Fairs, and Compassion Connect clinics.

Third, we attend community meetings to engage with service providers who work with minority and LEP clients directly. Some of the regular meetings we attend include the Home Forward GOALS meeting, the Financial Educators Peer Group Meeting, and the Oregon Military Support Network Meetings.

## Language Assistance Plan Sample

Annually we look at the clients referred to the program and try and anticipate language needs. We are currently able to serve English, Spanish, Russian and Ukrainian native speakers with our program staff. Our written application is available in English, Spanish and Russian. We compile and have available a list of interpretation/translation resources, that we use if we need assistance. When a client in our program has limited English proficiency, we outreach to family and friends of clients for continued support in case management.

## Minority Representation Table Sample

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	Caucasian	Latino	African American	Asian American	Native American
Population					
Transportation Committee					
Citizen Advisory Council					
Bicycle Pedestrian Committee					

ATTACHMENT J: TRIMET TITLE VI TRANSIT EQUITY IMPACTS ASSESSMENT —  
RECOMMENDED PLAN FOR MAJOR SERVICE AND FARE CHANGES

**TriMet Title VI/Transit Equity Impacts Assessment**

**Recommended Plan for Major Service Changes and Fare Changes;  
Effective September 2012**

**April 11, 2012**

## I. Executive Summary

This report evaluates transit equity impacts of recommended fare changes and major service changes in the plan for revenue-generating and cost-saving measures to balance the Fiscal 2013 budget. The recommended plan reflects feedback from riders, business leaders, community groups, and other stakeholders and recommendations of the TriMet Board and Budget Task Force. More than 3,000 persons provided nearly 8,500 comments on the initial proposal released on February 8, and more than 1,000 persons provided over 2,400 comments on the refined proposal released on March 14, including testimony at five public hearings.

Discussion and community feedback have highlighted that when choosing between service reductions and higher fares, additional revenue from fares is preferred in lieu of additional service cutbacks. The recommended plan has been designed and further refined to minimize service cuts and the overall impact to riders. The plan strives to balance affordable fares for those who depend on the system with maintaining service on the street to get people where they need to go.

As further described in this report, mitigations for the impacts of fares and service changes are included as integral elements of the plan.

### Closing the FY 2013 Budget Gap

The initial proposal released on February 8 was designed to generate \$12 million in revenue and reduce costs by \$5.7 million, including measures to:

- Increase fares, eliminate zones, make single-ride tickets valid in one direction only, eliminate the Free Rail Zone, and implement a new Day Pass structure;
- Modify bus routes for more efficient coverage (14 lines), eliminate low-ridership trips (26 bus lines), eliminate some weekend service (3 bus lines), reduce the frequency of MAX service (except during rush hours), modify MAX Red Line operations during non-rush times;
- Adjust LIFT paratransit service boundary to match nearby bus/MAX service;
- Cut programs and staff as part of ongoing internal efficiencies;
- Reduce annual contribution to Portland Streetcar, and;
- Sell ads on TriMet websites.

The recommended plan would generate \$9 million in revenue and reduce costs by \$3 million. Changes from the initial proposal in February include:

- Set aside the fare policy change making single-ride tickets one-way only;
- Scale back service cuts from initial 42 bus lines and four MAX lines to 24 bus lines;
  - eliminate low-ridership trips on 9 bus lines (previously 26 lines),
  - no discontinuation of weekend service on any bus lines
  - no reduction of MAX frequency
  - no change in MAX Red Line operation, and;
- Increase savings from internal efficiencies from \$0.5 million to \$1.2 million.

The initial proposal aimed for \$17 million in savings, due to uncertainty around the unsettled labor contract with ATU Local 757. Since then, a further four-month delay in the scheduled arbitration means the outcome of the contract dispute will not be known until after the FY 2013 budget begins. The recommended plan totals \$12 million in savings. Depending on the outcome of the labor contract

arbitration with the ATU, expected to be announced in July 2012, TriMet may need to find additional savings of \$5 million, resulting in additional fare increases, service reductions, or both.

## **Context of Recommended Service Reductions and Fare Increases**

TriMet is facing a \$12–\$17 million shortfall in FY 2013 because of lower-than-expected revenue from payroll taxes, anticipated cuts in federal funding, and unsustainable health care and other costs for union employees:

- Slower than expected growth in payroll tax revenues due to extended high unemployment (\$3 million)
- Uncertainty and a projected reduction in federal formula funding (\$4 million)
- Negotiations with ATU Local 757 over health care benefits and other cost-cutting measures are at an impasse and arbitration has been delayed (\$5-10 million)

## **Actions Already Taken To Balance the Budget During the Extended Recession**

To balance the budget during the recession TriMet has cut costs, cut administrative staff, delayed investments, used stimulus money and depleted reserves. The agency has made cuts to non-union employee and retiree benefits, reduced the workforce by over 200 positions, and implemented executive furloughs and a non-union salary freeze (now in its fourth year). Replacement of older buses and upgrading the fare collection system have been delayed, and upkeep of facilities and offices has been kept at a minimum. Growth in LIFT paratransit service costs has been reduced, the fuel efficiency of the bus fleet has been improved, and employee overtime costs have been reduced.

In 2005, the employer payroll tax rate was increased to pay for operation of new services such as WES Commuter Rail, MAX Green Line, Portland Streetcar extensions, LIFT ADA paratransit service increases, and Portland-Milwaukie Light Rail.

In 2008, fares were raised 20 cents to cover increasing diesel prices, in addition to the regular 5-cent annual increase for inflation. In 2010, TriMet's fare-free zone was limited to MAX Light Rail and Portland Streetcar. Recently, the number of fare enforcement staff was increased to help reduce fare evasion.

In 2009 and 2010, TriMet was forced to reduce bus and MAX service to help address budget shortfalls caused by the ongoing recession. These reductions totaled 13% of bus service and 10% of MAX service.

## **Title VI and Transit Equity**

Under federal law and implementing regulations TriMet ensures that the level and quality of service is provided without regard to race, color or national origin; and that services and benefits, as well as burdens, are fairly distributed. TriMet:

1. *Considers equity impacts and the availability of alternatives in developing fare change and major service change proposals.* A primary goal in developing this proposal for revenue increases and cost-reduction is preservation of service to minimize the impact to TriMet's riders. Recommended service reductions give careful consideration to the availability of alternative service. Similarly, possible equity impacts and mitigation measures are weighed in developing a fare change proposal.

2. *Evaluates any proposed fare changes and major service changes at the proposal stage to identify disparate impacts on minority populations and disproportionately high or adverse effects on minority and/or low-income populations.* When disparate impacts are apparent, specific mitigation measures are included.

When disparate impacts are apparent, proposed actions may be taken if it is demonstrated that the proposal meets a substantial need that is in the public interest and other alternatives would have more severe adverse effects than the recommended plan.

## **Analysis Methodology**

The evaluation considers impacts on minority and low-income populations across the TriMet district. Changes were assessed using information from the US Census, TriMet service, ridership and fare system data, and demographic and fare information collected through TriMet surveys. Service changes were evaluated line-by-line and at the system level. Fare changes were evaluated by category of fare (Adult, Youth, Honored Citizen) and by payment option (cash, ticket, pass).

For lines with major service changes, if the percentages for impacted minority and low-income populations in tracts served by impacted portion of the line exceed those of the district as a whole, the impacts of changes to the line will be considered disproportionate. To determine the system-wide impacts of service changes, the percentages for impacted minority and low-income populations (all impacted tracts) are compared to the percentages for impacted non-minority and non-low-income populations. If the percentages for impacted minority and low-income populations differ from those of the impacted non-minority and non-low-income populations by more than 20%, the changes overall will be considered disparate.

For fare changes, a potential disparate impact is noted when the percentage of trips by minority and/or low-income riders using a fare option has an impact that exceeds the comparable impact on non-minority and non-low-income riders.

## **Recommended Service Changes and Analysis Results**

### **Recommended major service changes include 20 bus lines:**

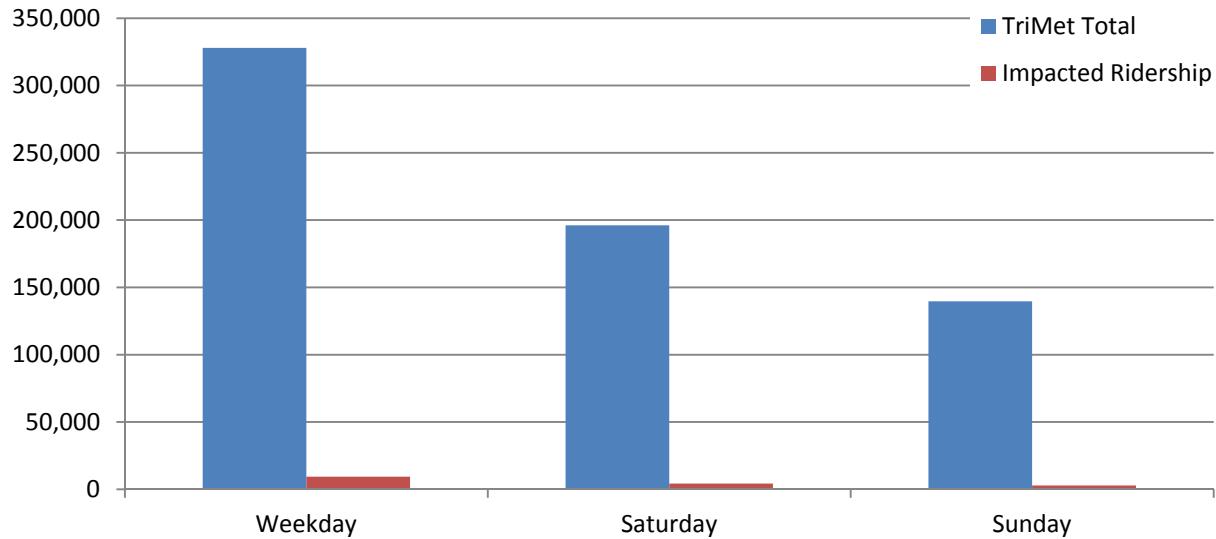
Bus and MAX lines with major changes have been scaled back from 28 to 20 lines:

- Routing changes on the following bus lines: 6, 8, 9, 12, 16, 17, 47, 48, 67, 70, 73, 77, 82, 89;
- Span of service changes by time of day and/or day of week on the following bus lines: 18, 50, 55, and 59;
- Routing and span of service changes on lines 43 and 87.

### **Numbers of Boarding Rides Impacted**

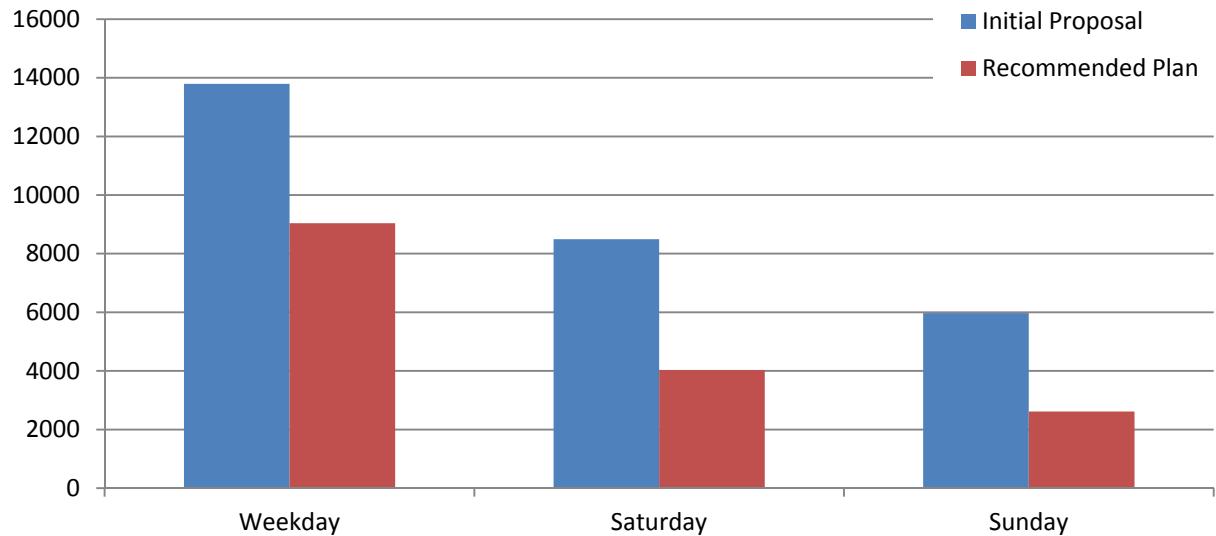
As shown in Figure ES-1 following, major service changes would impact an estimated 2 to 3 percent of system-wide daily boarding rides: on weekdays approximately 2.7% (8,820) of boardings; on Saturdays approximately 2.1% (4,028) of boardings, and; on Sundays approximately 1.9% (2,614) of boardings.

**Figure ES-1**  
**Total Ridership by Day of Week with Major Change Impacts**



Ridership impacts have been substantially reduced in comparison to the initial proposal. The number of impacted boardings on weekdays has been reduced by 36.0%. On Saturday the reduction was 52.6% and on Sunday, 56.2%. Impacts for the initial proposal and recommended plan are illustrated in Figure ES-2.

**Figure ES-2**  
**Change in Impacted Ridership**



## Title VI/ Transit Equity Impacts

Title VI impacts at the route level disproportionate to representation within TriMet's service area were found as a result of this analysis.

### Route Change Equity Impacts

Routes with major changes resulting in potential disproportionate impacts to both minority and low-income populations are 9, 16, 67, and 82. The following lines have potential disproportionate impacts to minority populations only: 6, 8, 47, 48, and 89. These lines have potential disproportionate impacts to low-income populations only: 12, 17, 70, 73, and 77.

### Span of Service Change Equity Impacts

Line 59 is the only route with a major span of service change resulting in potential disproportionate impacts to only minority populations. Lines 18 and 55 have potential disproportionate impacts to low-income populations only. The recommended span changes to Line 50 have no disproportionate impacts.

### Route and Span of Service Change Equity Impacts

For routes with both major route and span changes Line 87 has potential disproportionate impacts to both minority and low-income populations. Line 43 has disproportionate impacts to low-income populations only.

## System Level Equity Impacts

At the system level no disparate transit equity impacts were identified. When comparing impacted Title VI populations to impacted non-Title VI populations for weekday, Saturday and Sunday the overall percentages were within non-disparate thresholds. That is, impacted minority and low-income populations were within 20% of impacted non-Title VI populations.

System level impacts are profiled in Table ES-1 for minority and low-income populations, with impacts to Title VI and non-Title VI populations, relative to the non-disparate range of impact by day of service.

**Table ES-1**  
**System Level Equity Impacts of Major Service Changes**

Minority Assessment	Percent of Non-Minority Population Impacted	Non-Disparate Range	Percent of Minority Population Impacted	Disparate Impact?
Weekday	37.8%	30.2 – 45.4%	37.0%	No
Saturday	29.5%	23.6 – 35.4%	29.9%	No
Sunday	27.1%	21.7 – 32.5%	26.3%	No

Low-Income Assessment	Percent of Non-Low-Income Population Impacted	Non-Disparate Range	Percent of Low-Income Population Impacted	Disparate Impact?
Weekday	37.0%	29.6 – 44.4%	38.7%	No
Saturday	28.7%	23.0 – 34.4%	32.2%	No
Sunday	26.0%	20.8 – 31.3%	29.3%	No

## Mitigations – Service Changes

Although at the system level no disparate impacts were identified, at the route level there are 19 of 20 lines where the recommended changes may impact minority and/or poverty populations disproportionately. Mitigation of these impacts is part of the proposal's design. A primary goal in crafting this service reduction proposal was the preservation of service to minimize the impact to TriMet's riders. The recommended changes take into account ridership, the availability of alternative service, as well as the use of the service for work and school trips.

### Availability of Alternative Service

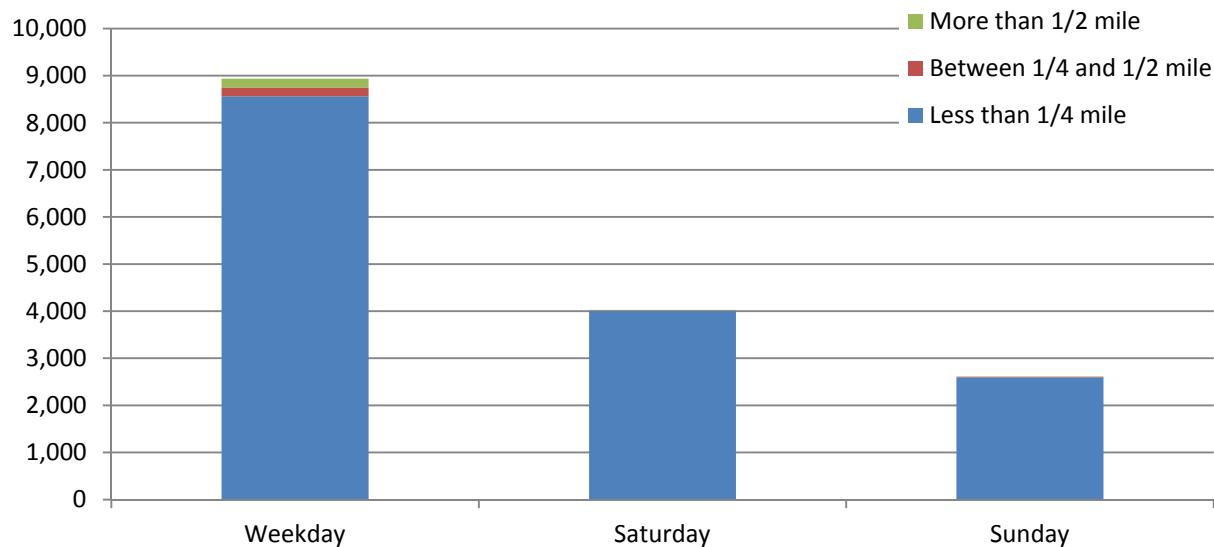
Of the 19 lines identified as having disproportionate impacts, 13 lines (nearly two-thirds) have alternative service for most impacted stops available either at the stop (6 lines), or within a quarter-mile-walk (7 lines). On the other six (6) lines, one-half or more of impacted stops have alternative service available within a half mile or less. In other cases an additional transfer may be needed to complete a particular trip. While this may not be an ideal solution from an individual rider's perspective it allows TriMet to preserve access to mobility for the broadest group of riders.

Additionally, some of the route changes will improve connectivity for some riders allowing them to make certain trips quicker and with fewer or no transfers.

The routes and route segments that do not have alternative service nearby generally have very low ridership thus the total number of impacted boardings is small. As shown in Figure ES-3, most impacted boardings would have alternative service available within less than  $\frac{1}{4}$  mile walking distance:

- Weekdays; 95.8% with alternative service within  $\frac{1}{4}$  mile;
- Saturdays; 99.6% with alternative service within  $\frac{1}{4}$  mile, and;
- Sundays; 99.3% with alternative service within  $\frac{1}{4}$  mile.

**Figure ES-3**  
**Walking Distance for Impacted Ridership**



Among the 20 lines with recommended major changes, the availability of alternative services for impacted stops is further summarized in Table ES-2.

**Table ES-2**  
**Alternative Service Availability**

Level of Alternative Service Available For Impacted Stops	Number of Lines
<b>Fully Covered</b> (All impacted stops directly served by one or more other lines, with similar span of service. Trips may require a transfer.)	6
<b>High</b> (Alternative service within $\frac{1}{4}$ mile or less walking distance for 75% or more of impacted boardings and alightings. Trips may require a transfer.)	8
<b>Medium</b> (Alternative service within $\frac{1}{2}$ mile walking distance for at least 50% of impacted boardings and alightings. Trips may require a transfer.)	5
<b>Low</b> (Alternative service greater than $\frac{1}{2}$ mile walking distance for 50% or more of impacted boardings and alightings. Trips may require a transfer.)	1

## **Recommended Fare Changes and Analysis Results**

Recommended fare changes include:

- General fare increase across all fare categories except Honored Citizens (persons age 65+, persons with a disability, or persons with a Medicare card);
- Eliminate fare zones and implement a flat fare for adults;
- Eliminate the Free Rail Zone in downtown Portland and the Lloyd District;
- Introduce a Day Pass for all fare categories, priced at only twice the single trip fare; and
- Introduce a new 7-Day Pass for Youth and Honored Citizens.

TriMet's initial budget proposal considered limiting single trip tickets to travel in one direction only. Under that proposal, all tickets and transfers would be valid within the expiration time to make a trip in one direction, and a return trip ("round-trip") would not be allowed on the same fare. However, the initial proposal was based on a potential budget shortfall of \$17 million in the next fiscal year. Due to the timing of labor negotiations, and because public feedback indicated the change to one-way tickets was the least attractive option of the recommended fare changes, restricting single trip fares to travel in one direction has not been included in the revised proposal. Depending on the outcome of the labor contract arbitration with the ATU, expected to be announced in July 2012, TriMet may need to find additional savings of \$5 million, resulting in additional fare increases, service reductions, or both.

Current and recommended fares by fare option and category including amount and percentage of increases from current fares are shown in Table ES-3 on the following page.

**Table ES-3**  
**Current and Recommended Fares by Fare Option and Category: Increase Amounts and Percents;**  
**Usage by Low-Income, Minority, and Overall**

Fare Option and Category	Current	Recommended	Usage by Group				
	Effective September 2011	Effective September 2012	Increase Amount	% Increase	Low-Income (<\$20K)	Minority	
<b>CASH</b>							
2-Zone	\$2.10	\$2.50 <sup>1</sup>	\$0.40	19.0%	21.9%	18.9%	16.3%
All-Zone	\$2.40	\$2.50 <sup>1</sup>	\$0.10	4.2%	12.7%	12.7%	10.6%
Youth	\$1.50	\$1.65	\$0.15	10.0%	3.9%	7.4%	4.6%
Honored Citizen	\$1.00	\$1.00	\$0.00	0.0%	4.5%	2.3%	2.9%
<b>DAY PASS</b>							
All-Zone	\$5.00	\$5.00 <sup>1</sup>	\$0.00	0.0%	1.7%	1.6%	1.4%
Youth	N/A	\$3.30					
Honored Citizen	N/A	\$2.00					
<b>TICKETS (Book of 10)</b>							
1-Zone	\$20.50	\$25.00 <sup>1</sup>	\$4.50	22.0%	0.9%	0.6%	0.9%
2-Zone	\$21.00	\$25.00 <sup>1</sup>	\$4.00	19.0%	3.3%	2.5%	3.5%
All-Zone	\$24.00	\$25.00 <sup>1</sup>	\$1.00	4.2%	2.3%	2.7%	3.0%
Youth	\$15.00	\$16.50	\$1.50	10.0%	0.3%	1.0%	0.6%
Honored Citizen	\$10.00	\$10.00	\$0.00	0.0%	1.2%	0.5%	1.0%
<b>7-DAY PASS</b>							
2-Zone	\$21.00	\$26.00 <sup>1</sup>	\$5.00	23.8%	0.2%	0.1%	0.1%
All-Zone	\$24.00	\$26.00 <sup>1</sup>	\$2.00	8.3%	0.3%	0.2%	0.2%
Youth	N/A	\$8.00					
Honored Citizen	N/A	\$7.00					
<b>14-DAY PASS</b>							
2-Zone	\$41.00	\$51.00 <sup>1</sup>	\$10.00	24.4%			
All-Zone	\$46.50	\$51.00 <sup>1</sup>	\$4.50	9.7%			
Youth	\$14.00	\$15.50	\$1.50	10.7%			
Honored Citizen	\$13.50	\$13.50	\$0.00	0.0%			
<b>HALF MONTHLY PASS</b>							
2-Zone	\$41.50	Eliminated					
All-Zone	\$47.00	Eliminated					
Youth	\$14.50	Eliminated					
Honored Citizen	\$14.00	Eliminated					
<b>MONTHLY PASS</b>							
2-Zone	\$81.00	\$100.00 <sup>1</sup>	\$19.00	23.5%	7.8%	7.5%	8.6%
All-Zone	\$92.00	\$100.00 <sup>1</sup>	\$8.00	8.7%	9.7%	11.3%	12.8%
Youth	\$27.00	\$30.00	\$3.00	11.1%	3.5%	7.1%	5.0%
Honored Citizen	\$26.00	\$26.00	\$0.00	0.0%	10.5%	4.8%	6.0%
<b>ANNUAL PASS</b>							
2-Zone	\$891.00	\$1,100.00 <sup>1</sup>	\$209.00	23.5%	0.0%	0.1%	0.4%
All-Zone	\$1,012.00	\$1,100.00 <sup>1</sup>	\$88.00	8.7%	3.7%	9.3%	11.5%
Youth	N/A	\$330.00					
Honored Citizen	\$286.00	\$286.00	\$0.00	0.0%	0.5%	0.2%	0.3%

Data not available for all fare media. Note: <sup>1</sup> Effective September 1, 2012 there would be a single Adult fare option; 2-Zone and All-Zone are shown for 2012 to illustrate price increases from current fares.

Results of the analysis are summarized in Table ES-4 below. A possible disparate impact is noted in regard to low-income and minority populations for cash fare users. It should be noted, however, that as cash payers appear to be somewhat more likely to be low-income and/or minority, this proposal would increase cash fares proportionately less than pass fares. Additional mitigation measures are described below. Analysis of fare changes is provided in Sections VIII. through XI. of the report, and statistically significant differences are noted.

**Table ES-4**  
**Equity Impacts of Fare Changes**

Fare Change Proposal Elements	Minority Disparate Impact	Low-Income Disparate Impact	Mitigation Measures
1. Implement Adult flat fare of \$2.50; eliminate zones: a. Increase cash fares: Adult All-Zone 4.2%, Adult 2-Zone 19%, and Youth 10%	Possible	Possible	Yes
b. Increase pre-paid tickets: All-Zone 4.2%, Adult 1 & 2-Zone 19%-22%, and Youth 10%	Not Likely	Not Likely	Yes
c. Increase multi-ride passes: Adult All-Zone 7.5%-8.7%, Adult 2-Zone 22%-23.8%, and Youth 10.7%-11.1%	Not Likely	Not Likely	Yes
2. Eliminate Free Rail Zone	Not Likely	Not Likely	Yes
3. Introduce new 7-Day pass for Youth and Honored Citizens	Not Likely	Not Likely	
4. Introduce a new Day Pass for Adult, Youth, and Honored Citizens at twice the single trip fare	Not Likely	Not Likely	

### **Mitigations – Fare Changes**

TriMet has initiated a number of fare programs and options to create fare alternatives for minority and low income populations, with a focus on expanding unlimited ride options that offer more flexible and economical payment opportunities. New programs and options will accompany the September 2012 fare changes while existing programs will be maintained or enhanced, summarized following.

## Summary of Mitigation Measures

### Measures for September 2012:

- *For September 2012, TriMet will introduce unlimited ride Day Passes (priced at only twice the single ride cash fare) and 7-Day Passes for Adults, Youth, and Honored Citizens. Day Passes and 7-Day Passes will be new options for both Honored Citizens and Youth. Day Passes will provide Youth and Honored Citizen cash payers with a convenient and economical alternative to paying for each ride separately, with the added benefit of unlimited rides during the day for the price of a roundtrip, a significant financial benefit for customers making multiple trips during the day. Similarly, the 1-Day Pass price for Adults will not increase and will remain at \$5.00, providing unlimited rides throughout the day for only twice the single fare. Providing a 7-Day Pass for each fare category offers another new unlimited ride product, for less than the upfront cost of a monthly pass. Increased marketing efforts are planned to remind people about the financial benefits of unlimited ride passes.*

*The Day Pass and 7-Day Pass options offer additional payment and unlimited ride alternatives, and prospective mitigations for low-income and minority persons. The new Day Pass offers a prospective mitigation for low-income and minority persons currently using single-ride cash fares or tickets. In addition, eliminating fare zones provides a more equitable system for those individuals that live in the suburbs (who have become increasingly more likely to be low-income and minority) and travel great distances, as well as individuals that are penalized for living near a zone boundary. These minority and low-income suburban residents, who are more likely to pay with a single-ride cash fare, will especially benefit from the unlimited ride advantages provided by the new Day Pass and 7-Day Pass format.*

- *For September 2012, TriMet will explore increasing the program discount to social service agencies from 5% to 10%, and will consider expanding program eligibility requirements to ensure that more community-based organizations that focus on providing services to low-income clients will be able to participate. With additional community outreach and education, TriMet hopes to work with organizations that serve homeless and/or low income persons, to help their clients access services critical to personal and residential stability.*
- *To mitigate the impact of recent fare increases for TriMet's LIFT paratransit service, Honored Citizen fares (senior citizens aged 65 and older, person with a disability, or person with a Medicare card) for fixed-route service will not increase at this time. Keeping Honored Citizen fares flat will help disabled individuals that are able to use fixed-route service transition to the higher LIFT fares. The Committee on Accessible Transportation (CAT) recommended that the Honored Citizen cash and pass fare not be increased during the transition to higher LIFT fares.*
- *To reduce the need for additional fare increases and service cuts that would adversely impact low-income riders throughout the service district, TriMet is proposing to eliminate the Free Rail Zone in downtown Portland. To mitigate the potential impact of eliminating the Free Rail Zone for the elderly and people with disabilities, TriMet will extend the Honored Citizen Downtown Pass Program (currently for Bus) to include free trips on rail for these individuals. To be eligible, customers must qualify as a TriMet Honored Citizen (senior citizen aged 65 and older, person with a disability, or person with a Medicare card), and be able to show proof of residence within the boundaries of the free fare area. Maintaining free bus/rail transit service in downtown for seniors and people with*

disabilities ensures that the most vulnerable citizens, many of whom are transit dependent, will continue to have the same access to transit and much needed services in the downtown area, including access to medical care, shopping and social services.

- *To reduce the need for additional fare increases and service cuts that would adversely impact low-income riders throughout the service district, TriMet has increased administrative cuts from \$500,000 to \$1.2 million.*
- TriMet's initial budget proposal considered limiting single trip tickets to travel in one direction only. Under that proposal, all tickets and transfers would be valid within the expiration time to make a trip in one direction, and a return trip ("round-trip") would not be allowed on the same fare. However, the initial proposal was based on a potential budget shortfall of \$17 million in the next fiscal year. *Due to the timing of labor negotiations, and because public feedback indicated the change to one-way tickets was the least attractive option of fare changes initially proposed, restricting single trip fares to travel in one direction has not been included in the recommended changes for September 2012.*
- In 2011, TriMet created a 30-Day Pass, using an in-house developed ticket printing application at TriMet's main Ticket Office. A 30-Day Pass is a benefit over the current calendar month pass format for customers who do not receive Government-issued benefit checks until the 3<sup>rd</sup> or 5<sup>th</sup> of the month. A 30-Day Pass is also a convenience for customers who desire the flexibility of not being locked into a calendar month format. *In September 2012, 30-Day Passes will also be available at ticket vending machines on all rail platforms.*

**Measure for June 2013:**

- *As of June, 2013 bus transfers will be valid for two hours from the time issued. This is the current policy for MAX transfers. Extending transfer times on buses to two hours will provide an additional benefit to many riders who pay with cash and tickets. New ticket printers will be installed on all buses to facilitate this change.*

**Mitigation Measures Already In Place:**

- In September 2008, TriMet created a 14-Day Pass, designed for low income customers who might be unable to afford the up-front cost of a monthly pass, but would still like to realize the savings of unlimited rides.
- In January 2006, TriMet created a 7-Day Pass for Adults, another product designed for low income customers who might be unable to afford the up-front cost of a monthly pass.

## **II. Introduction**

This report evaluates transit equity impacts of recommended fare changes and major service changes in the plan for revenue-generating and cost-saving measures to balance the Fiscal 2013 budget. The recommended plan reflects feedback from riders, business leaders, community groups, and other stakeholders and recommendations of the TriMet Board and Budget Task Force. More than 3,000 persons provided nearly 8,500 comments on the initial proposal released on February 8, and more than 1,000 persons provided over 2,400 comments on the refined proposal released on March 14, including testimony at five public hearings.

Discussion and community feedback have highlighted that when choosing between service reductions and higher fares, additional revenue from fares is preferred in lieu of additional service cutbacks. The recommended plan has been designed and further refined to minimize service cuts and the overall impact to riders. The plan strives to balance affordable fares for those who depend on the system with maintaining service on the street to get people where they need to go.

As further described in this report, mitigations for the impacts of fares and service changes are included as integral elements of the plan.

### **Context of Recommended Transit Service Reductions and Fare Increase**

TriMet is facing a \$12–\$17 million shortfall in FY 2013 because of lower-than-expected revenue from payroll taxes, anticipated cuts in federal funding, and unsustainable health care and other costs for union employees:

- Slower than expected growth in payroll tax revenues due to extended high unemployment (\$3 million)
- Uncertainty and a projected reduction in federal formula funding (\$4 million)
- Negotiations with ATU Local 757 over health care benefits and other cost-cutting measures are at an impasse and arbitration has been delayed (\$5-10 million)

### **Closing the FY 2013 Budget Gap**

The initial proposal released on February 8 was designed to generate \$12 million in revenue and reduce costs by \$5.7 million, including measures to:

- Increase fares, eliminate zones, make single-ride tickets valid in one direction only, eliminate the Free Rail Zone, and implement a new Day Pass structure;
- Modify bus routes for more efficient coverage (14 lines), eliminate low-ridership trips (26 bus lines), eliminate some weekend service (3 bus lines), reduce the frequency of MAX service (except during rush hours), modify MAX Red Line operations during non-rush times;
- Adjust LIFT paratransit service boundary to match nearby bus/MAX service;
- Cut programs and staff as part of ongoing internal efficiencies;
- Reduce annual contribution to Portland Streetcar, and;
- Sell ads on TriMet websites.

The recommended plan would generate \$9 million in revenue and reduce costs by \$3 million. Changes from the initial proposal in February include:

- Set aside the fare policy change making single-ride tickets one-way only;
- Scale back service cuts from initial 42 bus lines and four MAX lines to 24 bus lines;
  - eliminate low-ridership trips on 9 bus lines (previously 26 lines),
  - no discontinuation of weekend service on any bus lines
  - no reduction of MAX frequency
  - no change in MAX Red Line operation, and;
- Increase savings from internal efficiencies from \$0.5 million to \$1.2 million.

The initial proposal aimed for \$17 million in savings, due to uncertainty around the unsettled labor contract with ATU Local 757. Since then, a further four-month delay in the scheduled arbitration means the outcome of the contract dispute will not be known until after the FY 2013 budget begins. The recommended plan totals \$12 million in savings. Depending on the outcome of the labor contract arbitration with the ATU, expected to be announced in July 2012, TriMet may need to find additional savings of \$5 million, resulting in additional fare increases, service reductions, or both.

Title VI and Transit Equity impacts of recommended major service changes are assessed in Sections IV. through VII., and recommended fare changes are assessed in Sections VIII. through XI. following.

## **Title VI and Transit Equity**

TriMet complies with Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1A to ensure that:

- The level and quality of service is provided without regard to race, color or national origin;
- There is full and fair participation in decision making without regard to race, color or national origin, and;
- There is meaningful access to programs by persons with limited English proficiency.

TriMet complies with the 1994 Presidential Executive Order 12898 and U.S. DOT Order 5610.2 of 1997 regarding Environmental Justice to:

- Identify and address disproportionately high and adverse human health or environmental effects of programs, policies and activities on minority and/or low income populations
- Include racial and ethnic populations and low-income communities in decision-making
- Ensure that services and benefits, as well as burdens, are fairly distributed to avoid discrimination.

## **Definition of Minority and Low-Income Populations**

### **From FTA Circular 4702.1A:**

"Minority Persons include the following:

- (1) American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
- (2) Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent.

- (3) Black or African American Populations, which refers to peoples having origins in any of the Black racial groups of Africa.
- (4) Hispanic or Latino Populations, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- (5) Native Hawaiian and Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands."

**From FTA Circular 4702.1A:**

"Low-Income means a person whose median household income is at or below the Department of Health and Human Services' poverty guidelines." The terms "low-income" and "poverty" are used interchangeably in this report and both follow this definition.

### **III. TriMet System Ridership Profile**

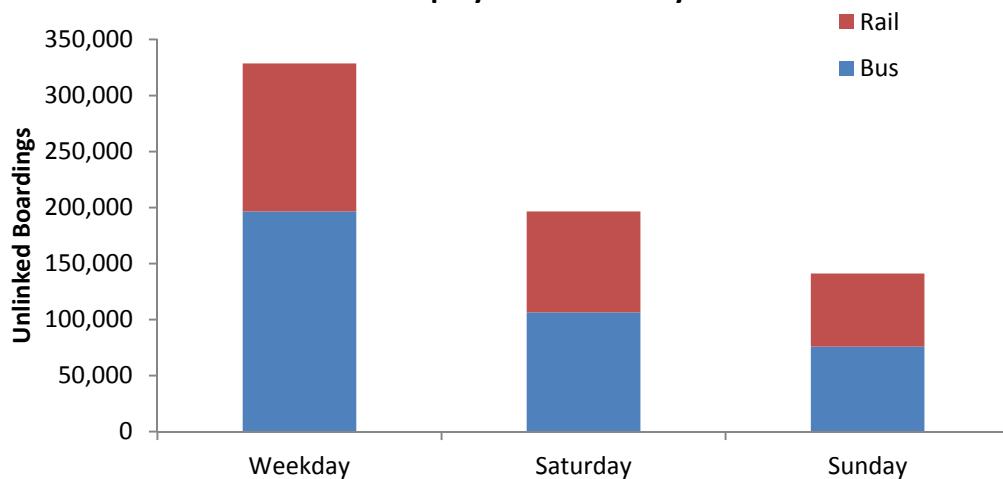
#### **Daily Ridership**

The following data as plotted in Figure 1 below illustrate the distribution of ridership between TriMet's bus and rail systems on weekday, Saturday, and Sunday. Ridership data is collected on an on-going basis via Automatic Passenger Counters (APCs) on TriMet vehicles and summarized quarterly. This data is from the Fall 2011 summary period.

Service Day	Bus	Rail	Total
Weekday	196,550	132,150	328,700
Saturday	106,430	90,140	196,570
Sunday	75,940	65,260	141,200

Rail includes both MAX light rail and WES commuter rail.

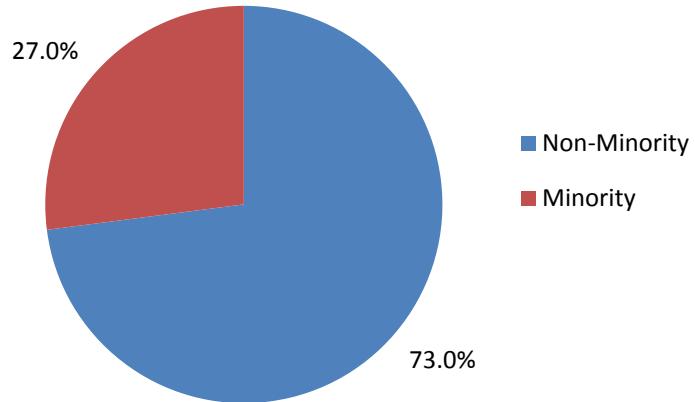
**Figure 1**  
**Ridership by Mode and Day**



## Race and Ethnicity – Service Area Profile

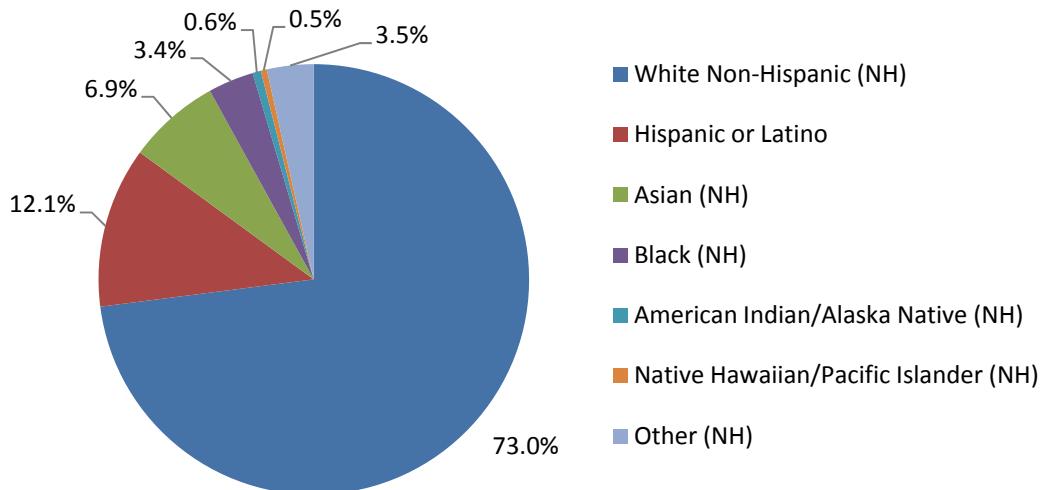
Based on 2010 US Census data 27% of the population within TriMet's service district is considered minority using the definition provided in FTA Circular 4702.1A, as shown in Figure 2.

**Figure 2**  
**2010 TriMet Service Area Population by Minority Status**



As shown in Figure 3, minority population within TriMet's service district includes Hispanic or Latino (12.1%), Asian (6.9%), Black (3.4%), American Indian/Alaskan Native (0.6%), Native Hawaiian/Pacific Islander (0.5%), and Other (3.5%).

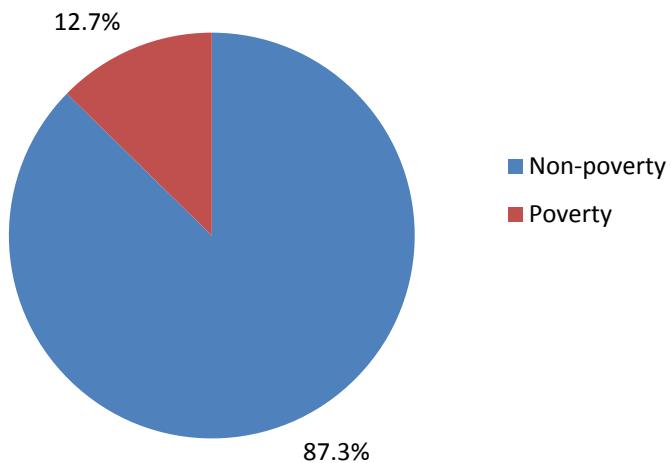
**Figure 3**  
**2010 TriMet Service Area Population Race/Ethnic Characteristics**



## Income – Service Area Profile

Based on 2006 - 2010 US Census American Community Survey 5-year estimates, 12.7% of the population within TriMet's service district is considered low-income (below poverty level) using the definition provided in FTA Circular 4702.1A, as shown in Figure 4

**Figure 4**  
**TriMet Service Area Population in Poverty**  
**2006-2010 Five-year Estimates**



## **IV. Background and Methodology – Service Changes**

### **Definition of Major Service Change**

TriMet will consider any service changes that qualify for a public hearing under TriMet Code, Section 18.15 as a “major service change” and in need of analysis under Title VI. Service changes that require a public hearing are as follows:

1. A change in service of:
  - a) 25% or more of the number of transit route miles, or;
  - b) 25% or more of the number of transit revenue vehicle miles of a route on a daily basis for the day of the week for which a change is made, or;
2. A new transit route is established.

Also included in these recommended service changes are several route “streamlining” changes which would restructure routes to remove overlapping or redundant services. While some changes in individual bus lines within the “streamlining” recommendations do not meet the TriMet Code definition of a “major service change,” they are included in this analysis to ensure the aggregate impacts of these changes involving multiple lines are fully accounted for.

Maps by day of week of the TriMet service area showing minority and poverty populations and the major service changes assessed in this report are included in Appendix A.

### **Quantification of Impacted Ridership**

#### **Ridership**

TriMet regularly collects passenger boarding and alighting data via Automatic Passenger Counters (APCs) installed on many of its buses and rail cars. Every trip is sampled multiple times during each quarterly service period resulting in passenger activity data available at the stop level and aggregated quarterly. This quarterly collection of ridership data is the Passenger Census. This analysis uses Passenger Census data from the Fall 2011 quarter unless otherwise noted.

- For route changes (a change to routing) ridership for the affected route segment(s) is used.
- For span of service changes (a change to operating hours or discontinuation of a full day of service) the entire line’s ridership is used.
- For trip discontinuations, trip level ridership data is used.
- For routes being split, passenger loads across the point of division are used.

## **Minority and Low-Income Populations**

Census tract level data is utilized for this analysis. The following data tables will be used to identify minority and low-income populations.

Minority: P5. HISPANIC OR LATINO ORIGIN BY RACE, 2010 Census Summary File 1

Poverty: C17002. RATIO OF INCOME TO POVERTY LEVEL IN THE PAST 12 MONTHS, 2006-2010  
American Community Survey 5-Year Estimates

### **Identification of Impacted Census Tracts**

Stops associated with routes or route segments that have recommended major changes are considered impacted. Any tract containing an impacted stop is considered impacted. For routes being split, the entire line (all stops) is considered impacted.

### **Determination of Route-Level Impacts**

TriMet does not collect demographic information at the route level. This analysis will focus on impacts to the impacted tracts served by routes with major service changes. If the percentages for impacted minority and low-income populations exceed those of the district as a whole, the changes to the route will be considered disproportionate.

TriMet service area thresholds for sensitive populations:

Population	Threshold
Minority	27%
Low-Income	12.7%

### **Determination of System-Level Impacts**

To determine the final system-wide impacts of the service changes, we will compare the percentages for impacted minority and low-income populations (all impacted tracts) to the percentages for impacted non-minority and non-low-income populations. If the percentages for impacted minority and low-income populations differ from those of the impacted non-minority and non-low-income populations by more than 20%, the changes overall will be considered disparate.

## V. Analysis – Service Changes

Lines with recommended major service changes and span of service adjustments were analyzed to determine if impacts to minority and low-income populations along each line or route segment would be considered disproportionate. Lines are analyzed based on whether the recommended change is a route change (change to routing) or a span of service change (a change to operating hours or discontinuation of a full day of service.)

Line-level impacts disproportionate to overall populations in TriMet's Service Area are shaded; figures with purple shading are disproportionate to minority populations and figures with beige shading are disproportionate to low-income populations.

### Route Changes (14 lines)

6-Martin Luther King Jr Blvd

8-Jackson Park/NE 15th

9-Powell/Broadway

12-Barbur/Sandy Blvd

16-Front Ave/St Johns

17-Holgate/NW 21st

47-Baseline/Evergreen

48-Cornell

67-Jenkins/158th

70-12th Ave

73-NE 33rd Ave

77-Broadway/Halsey

82-Eastman/182nd

89-Tanasbourne

### Span Changes (4 lines)

18-Hillside

50-Cedar Mill

55-Hamilton

59-Walker/Park Way

### Route and Span Changes (2 lines)

43-Taylors Ferry Rd

87-Airport Way/181st

Maps depicting route changes in this section are included in Appendix B.

## **Line 6-Martin Luther King Jr Blvd**

### *Service Changes*

All Days: Route would run from North Portland to Jantzen Beach via Martin Luther King Jr Blvd., Vancouver Way, and Marine Drive instead of via N Lombard St. and Denver Ave. in Kenton. This change would replace service along the north end of Line 8 with Line 6.

### *Ridership Impacts*

Line	Change Type	Day	Ons	Offs	Total
<b>6</b>	Route change	Weekday	818	784	1,602
<b>6</b>	Route change	Saturday	695	708	1,403
<b>6</b>	Route change	Sunday	531	523	1,054

### *Demographic Impacts*

Line	Change Type	Day	Tracts Minority	Minority Threshold	Tracts Poverty	Poverty Threshold
<b>6</b>	Route change	All days	35.5%	27%	12.3%	12.7%

### *Available Service Alternatives*

The segments of N Lombard and N Denver that would no longer be served by Line 6 would continue to be served by two Frequent Service lines, 4-Division/Fessenden and 75-Cesar E Chavez/Lombard. All but two impacted stops are within  $\frac{1}{4}$  mile of alternative service and all stops are within  $\frac{1}{2}$  mile. MAX Yellow Line service is also accessible nearby at the Kenton/N Denver and N Lombard TC stations.

Line	Day	Stops		Ons		Offs		Total	
		25	100.0%	818	100.0%	784	100.0%	1,602	100.0%
<b>6</b>	Weekday	25	100.0%	818	100.0%	784	100.0%	1,602	100.0%
<b>Distance to Alternative Service</b>									
	Less than 1/4 Mile	23	92.0%	816	99.8%	782	99.7%	1,598	99.8%
	Between 1/4 and 1/2 Mile	2	8.0%	2	0.2%	2	0.3%	4	0.2%
	Greater than 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>6</b>	Saturday	25	100.0%	695	100.0%	708	100.0%	1,403	100.0%
<b>Distance to Alternative Service</b>									
	Less than 1/4 Mile	23	92.0%	694	99.9%	706	99.7%	1,400	99.8%
	Between 1/4 and 1/2 Mile	2	8.0%	1	0.1%	2	0.3%	3	0.2%
	Greater than 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>6</b>	Sunday	25	100.0%	531	100.0%	523	100.0%	1,054	100.0%
<b>Distance to Alternative Service</b>									
	Less than 1/4 Mile	23	92.0%	531	100.0%	522	99.8%	1,053	99.9%
	Between 1/4 and 1/2 Mile	2	8.0%	0	0.0%	1	0.2%	1	0.1%
	Greater than 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%

## Line 8-Jackson Park/NE 15<sup>th</sup>

### *Service Changes*

All days: Route would end near NE Dekum & Durham instead of continuing to NE Middlefield Rd (Jubitz). This change would replace service north of Dekum with Line 6.

### *Ridership Impacts*

Line	Change Type	Day	Ons	Offs	Total
<b>8</b>	Route change	Weekday	456	475	931
<b>8</b>	Route change	Saturday	337	332	669
<b>8</b>	Route change	Sunday	249	258	507

### *Demographic Impacts*

Line	Change Type	Day	Tracts Minority	Minority Threshold	Tracts Poverty	Poverty Threshold
<b>8</b>	Route change	All days	43.7%	27%	12.4%	12.7%

### *Available Service Alternatives*

Line 6 would serve most stops formerly served by Line 8 along Martin Luther King Jr Blvd and north of Columbia Blvd. Some trips may require an additional walk of just more than  $\frac{1}{4}$  mile.

Line	Day	Stops		Ons		Offs		Total	
		24	100.0%	456	100.0%	475	100.0%	931	100.0%
<b>8</b>	Weekday	24	100.0%	456	100.0%	475	100.0%	931	100.0%
<b>Distance to Alternative Service</b>									
	Less than 1/4 Mile	23	95.8%	453	99.3%	439	92.4%	892	95.8%
	Between 1/4 and 1/2 Mile	1	4.2%	3	0.7%	36	7.6%	39	4.2%
	Greater than 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>8</b>	Saturday	24	100.0%	337	100.0%	332	100.0%	669	100.0%
<b>Distance to Alternative Service</b>									
	Less than 1/4 Mile	23	95.8%	336	99.7%	311	93.7%	647	96.7%
	Between 1/4 and 1/2 Mile	1	4.2%	1	0.3%	21	6.3%	22	3.3%
	Greater than 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>8</b>	Sunday	24	100.0%	249	100.0%	258	100.0%	507	100.0%
<b>Distance to Alternative Service</b>									
	Less than 1/4 Mile	23	95.8%	248	99.6%	242	93.8%	490	96.6%
	Between 1/4 and 1/2 Mile	1	4.2%	1	0.4%	16	6.2%	17	3.4%
	Greater than 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%

## Line 9-Powell/Broadway

### *Service Changes*

All Days: Route would be split into north and south. The section of Line 9 that travels from Gresham Transit Center into Downtown Portland along Powell Boulevard would not change its route, but the route would end downtown at Union Station. The Broadway (north) portion would be combined with Line 17-Holgate in Downtown Portland on the Portland Transit Mall. The combination would create a new connection between NE and SE Portland.

### *Ridership Impacts*

Line	Change Type	Day	Estimated Daily Loads*
9	Route change	Weekday	1,254
9	Route change	Saturday	531
9	Route change	Sunday	387

\*Across West Burnside.

### *Demographic Impacts*

Line	Change Type	Day	Tracts Minority	Minority Threshold	Tracts Poverty	Poverty Threshold
9	Route change	All days	28.1%	27%	18.7%	12.7%

### *Available Service Alternatives*

No route segments or stops are recommended to be discontinued. Some riders may need to make an additional transfer to complete their trips. However, other riders will have a new connection between NE and SE Portland.

## Line 12-Barbur/Sandy Blvd

### *Service Changes*

All Days: Line 12 would operate only between Tigard and Parkrose Transit Centers. In Southwest, Line 94 would provide local service between Sherwood and Tigard in the off-peak hours, and during peak hours, would continue both local service to Tigard as well as express trips into Downtown Portland from Tigard. In East Portland, a new local line from Gresham would connect to Line 12 at Parkrose.

### *Ridership Impacts*

Line	Change Type	Day	Estimated Daily Loads*
<b>12</b>	Route change	Weekday	1,596
<b>12</b>	Route change	Saturday	1,242
<b>12</b>	Route change	Sunday	1,096

\*At Tigard TC and Parkrose TC.

### *Demographic Impacts*

Line	Change Type	Day	Tracts Minority	Minority Threshold	Tracts Poverty	Poverty Threshold
<b>12</b>	Route change	All days	24.4%	27%	13.9%	12.7%

### *Available Service Alternatives*

No route segments or stops are recommended to be discontinued however riders travelling south of Tigard Transit Center or east of Parkrose Transit Center may be required to connect to new local services. These services would run between Tigard Transit Center and Sherwood and between Parkrose Transit Center and Gresham Transit Center.

## Line 16-Front Ave/St Johns

### *Service Changes*

Weekdays: Line 16 would serve the present Line 17 from St. Helens Rd. and Kittridge Ave. to Sauvie Island via Linnton and St. Johns and would no longer serve the Rivergate and Marine Dr. areas. Rivergate/Marine Dr. trips during weekday peak periods would be served by another bus line between St Johns and Jubitz. Service would be expanded mid-day weekdays and Saturdays to cover the former Line 17 segments.

### *Ridership Impacts*

Line	Change Type	Day	Ons	Offs	Total
<b>16</b>	Route change	Weekday		225 (Estimated Daily Load)*	

\*At St Johns.

### *Demographic Impacts*

Line	Change Type	Day	Tracts Minority	Minority Threshold	Tracts Poverty	Poverty Threshold
<b>16</b>	Route change	Weekday	30.8%	27%	21.9%	12.7%

### *Available Service Alternatives*

On weekdays riders who previously travelled to the Rivergate area via Line 16 will need to transfer to a new bus line at St. Johns or Jubitz.

## **Line 17-Holgate/NW 21<sup>st</sup>**

### *Service Changes*

Weekday and Saturday: Line 17 would no longer serve portions of NW Portland, Linnton, St Johns, or Sauvie Island. NW Everett St., NW Glisan St., and NW 21st Ave. would be served by Line 77 instead of Line 17. On weekdays and Saturdays, the NW Industrial Area would be served by Line 15 or 77. Sauvie Island, Linnton, and St Johns would be served by Line 16. The section of Line 17 from Downtown Portland to SE Holgate and 138th is not impacted but would be combined with the northern portion of Line 9 to form a new connection between NE and SE Portland.

### *Ridership Impacts*

Line	Change Type	Day	Ons	Offs	Total
<b>17</b>	Discontinue segment	Weekday	1,606	1,801	3,407
<b>17</b>	Discontinue segment	Saturday	438	488	926

### *Demographic Impacts*

Line	Change Type	Day	Tracts Minority	Minority Threshold	Tracts Poverty	Poverty Threshold
<b>17</b>	Discontinue segment	All days	19.8%	27%	20.7%	12.7%

### *Available Service Alternatives*

On weekdays and Saturdays riders may reach destinations along NW Everett St., NW Glisan St., and NW 21<sup>st</sup> Ave using Line 77. Additionally, Line 77 operates on Sundays. On weekdays and Saturdays Line 15 will serve the NW Industrial area and Line 16 will serve Linnton and Sauvie Island.

Line	Day	Stops		Ons		Offs		Total	
		44	100.0%	1180	100.0%	1,326	100.0%	2,506	100.0%
<b>17</b>	Weekday - NW	44	100.0%	1180	100.0%	1,326	100.0%	2,506	100.0%
	<b>Distance to Alternative Service</b>								
	Less than 1/4 Mile	44	100.0%	1180	100.0%	1,326	100.0%	2,506	100.0%
	Between 1/4 and 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Greater than 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>17</b>	Saturday - NW	44	100.0%	268	100.0%	304	100.0%	572	100.0%
	<b>Distance to Alternative Service</b>								
	Less than 1/4 Mile	44	100.0%	268	100.0%	304	100.0%	572	100.0%
	Between 1/4 and 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Greater than 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>17</b>	Weekday - St Helens Rd	87	100.0%	426	100.0%	475	100.0%	901	100.0%
	<b>Distance to Alternative Service</b>								
	Less than 1/4 Mile	87	100.0%	426	100.0%	475	100.0%	901	100.0%
	Between 1/4 and 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Greater than 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>17</b>	Saturday - St Helens Rd	85	100.0%	170	100.0%	184	100.0%	354	100.0%
	<b>Distance to Alternative Service</b>								
	Less than 1/4 Mile	85	100.0%	170	100.0%	184	100.0%	354	100.0%
	Between 1/4 and 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Greater than 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%

### **Line 47-Baseline/Evergreen**

#### *Service Changes*

All days: Line 47-Baseline/Evergreen would no longer run to Willow Creek/SW 185th Avenue Transit Center. Buses would instead run from Hillsboro to Sunset Transit Center via SW 185<sup>th</sup>, Bronson, Cornell, Cedar Hills, and Barnes. A short stretch of NW Evergreen Parkway between NW 185th and Cornell would not have service. Together Lines 47 and 48 would replace Line 89.

#### *Ridership Impacts*

Line	Change Type	Day	Ons	Offs	Total
<b>47</b>	Discontinue segment	Weekday	163	180	343

#### *Demographic Impacts*

Line	Change Type	Day	Tracts Minority	Minority Threshold	Tracts Poverty	Poverty Threshold
<b>47</b>	Discontinue segment	Weekday	36.5%	27%	10.5%	12.7%

#### *Available Service Alternatives*

On weekdays Line 47 riders travelling to or from Willow Creek/SW 185 Ave Transit Center would need to transfer at 185<sup>th</sup> Ave to Line 52. Line 52 serves stops on SW 185<sup>th</sup> Ave that were served by Line 47. The stops on the short stretch of NW Evergreen Parkway between NW 185th and Cornell would not have service are all within ½ mile of Line 52 stops on NW 185<sup>th</sup> Ave.

Line	Day	Stops		Ons		Offs		Total	
		24	100.0%	163	100.0%	180	100.0%	343	100.0%
<b>Distance to Alternative Service</b>									
	Less than 1/4 Mile	21	87.5%	154	94.5%	169	93.9%	323	94.2%
	Between 1/4 and 1/2 Mile	3	12.5%	9	5.5%	11	3.2%	20	5.8%
	Greater than 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%

### **Line 48-Cornell**

#### *Service Changes*

All days: Line 48-Cornell would no longer run to Willow Creek/SW 185th Avenue Transit Center. Buses would instead run from Hillsboro to Sunset Transit Center via SW Cornell, Cedar Hills, and Barnes. Together Lines 47 and 48 would replace Line 89.

#### *Ridership Impacts*

Line	Change Type	Day	Ons	Offs	Total
<b>48</b>	Discontinue segment	Weekday	244	189	433
<b>48</b>	Discontinue segment	Saturday	155	126	281

#### *Demographic Impacts*

Line	Change Type	Day	Tracts Minority	Minority Threshold	Tracts Poverty	Poverty Threshold
<b>48</b>	Discontinue segment	Weekday	36.5%	27%	10.5%	12.7%
<b>48</b>	Discontinue segment	Saturday	36.5%	27%	10.5%	12.7%

#### *Available Service Alternatives*

On weekdays and Saturdays Line 48 riders travelling to or from Willow Creek/SW 185 Ave Transit Center would need to transfer at 185<sup>th</sup> Ave to Line 52. Line 52 serves stops on SW 185<sup>th</sup> Ave that were served by Line 48.

On Sundays new service would be added on Line 48 matching the level of Saturday service now on Line 89.

Line	Day	Stops		Ons		Offs		Total	
<b>48</b>	Weekday	18	100.0%	244	100.0%	189	100.0%	433	100.0%
<b>Distance to Alternative Service</b>									
	Less than 1/4 Mile	18	100.0%	244	100.0%	189	100.0%	433	100.0%
	Between 1/4 and 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Greater than 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>48</b>	Saturday	18	100.0%	155	100.0%	126	100.0%	281	100.0%
<b>Distance to Alternative Service</b>									
	Less than 1/4 Mile	18	100.0%	155	100.0%	126	100.0%	281	100.0%
	Between 1/4 and 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Greater than 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%

## **Line 67-Jenkins/158<sup>th</sup>**

### *Service Changes*

Weekday: Line 67 would end at Merlo Road/SW 158th MAX Station instead of running to Beaverton TC along SW Jenkins Rd., Cedar Hills Blvd. and Center St. Other lines serve parts of the same streets as this line in central Beaverton.

### *Ridership Impacts*

Line	Change Type	Day	Ons	Offs	Total
<b>67</b>	Discontinue segment	Weekday	375	338	713
<b>67</b>	Discontinue segment	Saturday	91	101	192

### *Demographic Impacts*

Line	Change Type	Day	Tracts Minority	Minority Threshold	Tracts Poverty	Poverty Threshold
<b>67</b>	Discontinue segment	Weekday	40.6%	27%	16.6%	12.7%
<b>67</b>	Discontinue segment	Saturday	40.6%	27%	16.6%	12.7%

### *Available Service Alternatives*

On weekdays and Saturdays riders may be able to complete a portion of their trips using Lines 20 (along SW Cedar Hill Blvd. and SW Center St.) and Line 62 (along Jenkins Rd.). Some trips may require an additional walk of up to ½ mile.

The change would result in 10 more trips per day on remaining portion of line. The frequency would improve from approximately 45 minute midday currently to 30 minute midday service.

Line	Day	Stops		Ons		Offs		Total	
		32	100.0%	375	100.0%	338	100.0%	713	100.0%
<b>67</b>	Weekday	32	100.0%	375	100.0%	338	100.0%	713	100.0%
<b>Distance to Alternative Service</b>									
	Less than 1/4 Mile	29	90.6%	374	99.7%	334	98.8%	708	99.3%
	Between 1/4 and 1/2 Mile	3	9.4%	1	0.3%	4	0.6%	5	0.7%
	Greater than 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>67</b>	Saturday	32	100.0%	91	100.0%	101	100.0%	192	100.0%
<b>Distance to Alternative Service</b>									
	Less than 1/4 Mile	29	90.6%	91	100.0%	100	99.0%	191	99.5%
	Between 1/4 and 1/2 Mile	3	9.4%	0	0.0%	1	1.0%	0	0.0%
	Greater than 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%

## Line 70-12th Ave

### *Service Changes*

All Days: Line 70 would be combined with Line 73 at Lloyd Center and would no longer serve NE Multnomah Blvd. west of NE 9th Ave. or Rose Quarter Transit Center. This change would provide a new north-south crosstown service allowing more direct access between portions of NE and SE Portland.

### *Ridership Impacts*

Line	Change Type	Day	Ons	Offs	Total
<b>70</b>	Discontinue segment	Weekday	363	318	681
<b>70</b>	Discontinue segment	Saturday	207	169	376
<b>70</b>	Discontinue segment	Sunday	104	93	197

### *Demographic Impacts*

Line	Change Type	Day	Tracts Minority	Minority Threshold	Tracts Poverty	Poverty Threshold
<b>70</b>	Discontinue segment	All days	20.8%	27%	13.0%	12.7%

### *Available Service Alternatives*

On all days of the week when Line 70 no longer serves Multnomah Blvd. west of NE 9th Ave. riders may use other bus lines (8 and 77) and MAX lines (Blue, Green and Red) to reach Rose Quarter Transit Center. An additional walk of less than ¼ mile may be required.

Line	Day	Stops		Ons		Offs		Total	
<b>70</b>	Weekday	13	100.0%	363	100.0%	318	100.0%	681	100.0%
<b>Distance to Alternative Service</b>									
	Less than 1/4 Mile	13	100.0%	363	100.0%	318	100.0%	618	100.0%
	Between 1/4 and 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Greater than 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>70</b>	Saturday	13	100.0%	207	100.0%	169	100.0%	376	100.0%
<b>Distance to Alternative Service</b>									
	Less than 1/4 Mile	13	100.0%	207	100.0%	169	100.0%	376	100.0%
	Between 1/4 and 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Greater than 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>70</b>	Sunday	13	100.0%	104	100.0%	93	100.0%	197	100.0%
<b>Distance to Alternative Service</b>									
	Less than 1/4 Mile	13	100.0%	104	100.0%	93	100.0%	197	100.0%
	Between 1/4 and 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Greater than 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%

## Line 73-NE 33rd Ave

### *Service Changes*

All Days: Line 73 would be combined with Line 70 at Lloyd Center and would no longer serve NE Multnomah Blvd. west of NE 9th Ave. or Rose Quarter Transit Center. This change would provide a new north-south crosstown service allowing more direct access between portions of NE and SE Portland.

### *Ridership Impacts*

Line	Change Type	Day	Ons	Offs	Total
<b>73</b>	Discontinue segment	Weekday	203	253	456
<b>73</b>	Discontinue segment	Saturday	56	77	133
<b>73</b>	Discontinue segment	Sunday	44	62	106

### *Demographic Impacts*

Line	Change Type	Day	Tracts Minority	Minority Threshold	Tracts Poverty	Poverty Threshold
<b>73</b>	Discontinue segment	All days	20.8%	27%	13.0%	12.7%

### *Available Service Alternatives*

On all days of the week when Line 73 no longer serves Multnomah Blvd. west of NE 9th Ave. riders may use other bus lines (8 and 77) and MAX lines (Blue, Green and Red) to reach Rose Quarter Transit Center. An additional walk of less than ¼ mile may be required.

Line	Day	Stops		Ons		Offs		Total	
		12	100.0%	203	100.0%	253	100.0%	456	100.0%
<b>73</b>	Weekday	12	100.0%	203	100.0%	253	100.0%	456	100.0%
<b>Distance to Alternative Service</b>									
	Less than 1/4 Mile	12	100.0%	203	100.0%	253	74.7%	456	73.9%
	Between 1/4 and 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Greater than 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>73</b>	Saturday	12	100.0%	56	100.0%	77	100.0%	133	100.0%
<b>Distance to Alternative Service</b>									
	Less than 1/4 Mile	12	100.0%	56	100.0%	77	100.0%	133	100.0%
	Between 1/4 and 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Greater than 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>73</b>	Sunday	12	100.0%	44	100.0%	62	100.0%	106	100.0%
<b>Distance to Alternative Service</b>									
	Less than 1/4 Mile	12	100.0%	44	100.0%	62	100.0%	106	100.0%
	Between 1/4 and 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Greater than 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%

## **Line 77-Broadway/Halsey**

### *Service Changes*

All Days: Line 77 would replace Line 17 on NW Everett St, NW Glisan St and NW 21<sup>st</sup> Ave to Montgomery Park. Line 77 would no longer serve NW Station Way, NW Lovejoy St, NW Northrup St, or NW 25<sup>th</sup> Ave.

### *Ridership Impacts*

Line	Change Type	Day	Ons	Offs	Total
<b>77</b>	Discontinue segments	Weekday	426	432	858
<b>77</b>	Discontinue segments	Saturday	243	246	489
<b>77</b>	Discontinue segments	Sunday	172	164	336

### *Demographic Impacts*

Line	Change Type	Day	Tracts Minority	Minority Threshold	Tracts Poverty	Poverty Threshold
<b>77</b>	Discontinue segments	All days	18.2%	27%	19.3%	12.7%

### *Available Service Alternatives*

Riders beginning or ending trips along the discontinued segment along Station Way could utilize nearby service on NW 5<sup>th</sup> and 6<sup>th</sup> Avenues (MAX Green and Yellow lines as well as bus Line 33).

Service on NW Lovejoy and Northrup would be provided by Portland Streetcar. Riders wishing to board Line 77 would need to transfer from/to the Streetcar or walk to NW Everett or NW Glisan (between ¼ and ½ mile).

Service would no longer be provided on NW 25<sup>th</sup>. Riders could complete some trips by walking a short distance to Line 15 (along NW 23<sup>rd</sup> Ave.) or Line 77 (along NW 21<sup>st</sup> Ave.). These distances are less than ¼ mile.

Line	Day	Stops		Ons		Offs		Total	
		22	100.0%	426	100.0%	432	100.0%	858	100.0%
<b>Distance to Alternative Service</b>									
<b>77</b>	Weekday	22	100.0%	426	100.0%	432	100.0%	858	100.0%
	Less than 1/4 Mile	22	100.0%	426	100.0%	432	100.0%	858	100.0%
	Between 1/4 and 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Greater than 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>77</b>	Saturday	22	100.0%	243	100.0%	246	100.0%	489	100.0%
	Less than 1/4 Mile	22	100.0%	243	100.0%	246	100.0%	489	100.0%
	Between 1/4 and 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Greater than 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>77</b>	Sunday	22	100.0%	172	100.0%	164	100.0%	336	100.0%
	Less than 1/4 Mile	22	100.0%	172	100.0%	164	100.0%	336	100.0%
	Between 1/4 and 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Greater than 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%

## **Line 87-Airport Way/181<sup>st</sup>**

### *Service Changes*

Weekday: In East Multnomah County, Line 82 and Line 87 would be combined and called 87-Airport Way/181st. Buses would run between Gresham Transit Center and Gateway Transit Center along Eastman Parkway, 182nd/181st, and Airport Way. The line would have service all day from approximately 6 a.m. to 7 p.m.

### *Ridership Impacts*

Line	Change Type	Day	Ons	Offs	Total
<b>87</b>	Route change	Weekday	112	82	194

### *Demographic Impacts*

Line	Change Type	Day	Tracts Minority	Minority Threshold	Tracts Poverty	Poverty Threshold
<b>87</b>	Route change	Weekday	47.3%	27%	29.4%	12.7%

### *Available Service Alternatives*

On weekdays Line 87 would no longer serve Parkrose Transit Center and a few stops in the Rockwood area and would remain on NE 181<sup>st</sup> Ave. An additional walk of less than ¼ mile may be required.

Line	Day	Stops		Ons		Offs		Total		
		87	Weekday	5	100.0%	112	100.0%	82	100.0%	194
<b>Distance to Alternative Service</b>										
	Less than 1/4 Mile		5	100.0%	112	100.0%	82	100.0%	194	100.0%
	Between 1/4 and 1/2 Mile		0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Greater than 1/2 Mile		0	0.0%	0	0.0%	0	0.0%	0	0.0%

## Line 89-Tanasbourne

### *Service Changes*

All Days: Replace Line 89 with a combination of Lines 47 and 48. Line 47 would serve portions of NW Bronson Rd, NW 153<sup>rd</sup> Ave, NW Oak Hills and NW 143<sup>rd</sup> Ave on weekdays only. Line 48 would serve Cornell Rd seven days a week.

### *Ridership Impacts*

Line	Change Type	Day	Ons	Offs	Total
<b>89</b>	Route replaced	Weekday	29	39	68
<b>89</b>	Route replaced	Saturday	33*	53*	86*
<b>89</b>	Route replaced	Sunday	31*	40*	71*

\*Spring 2011 Passenger census data.

### *Demographic Impacts*

Line	Change Type	Day	Tracts Minority	Minority Threshold	Tracts Poverty	Poverty Threshold
<b>89</b>	Route replaced	All days	28.4%	27%	5.0%	12.7%

### *Available Service Alternatives*

On all days line 89 would be replaced by lines 47 and 48. Four stops along NE Evergreen Pkwy would no longer be served. For riders using these stops an additional walk of less than ¼ mile may be required. Segments along NW Bronson Rd, NW 153<sup>rd</sup> Ave, NW Oak Hills Dr, and NW 143<sup>rd</sup> Ave would not have service on weekends as Line 47 only operates on weekdays. For riders using these segments on these days an additional walk may be required to complete their trip. Walking distances could vary from less than ¼ mile to nearly 1 mile.

Line	Day		Stops	Ons	Offs	Total
<b>89</b>	Weekday		4 100.0%	29 100.0%	39 100.0%	68 100.0%
		<b>Distance to Alternative Service</b>				
		Less than 1/4 Mile	4 100.0%	29 100.0%	39 100.0%	68 100.0%
		Between 1/4 and 1/2 Mile	0 0.0%	0 0.0%	0 0.0%	0 0.0%
		Greater than 1/2 Mile	0 0.0%	0 0.0%	0 0.0%	0 0.0%
<b>89</b>	Saturday		42 100.0%	33 100.0%	53 100.0%	86 100.0%
		<b>Distance to Alternative Service</b>				
		Less than 1/4 Mile	13 31.0%	18 54.5%	30 56.6%	48 55.8%
		Between 1/4 and 1/2 Mile	12 28.6%	3 9.1%	7 13.2%	10 11.6%
		Greater than 1/2 Mile	17 40.5%	12 36.4%	16 30.2%	28 32.6%
<b>89</b>	Sunday		42 100.0%	31 100.0%	40 100.0%	71 100.0%
		<b>Distance to Alternative Service</b>				
		Less than 1/4 Mile	13 31.0%	13 41.9%	24 60.0%	37 52.1%
		Between 1/4 and 1/2 Mile	12 28.6%	11 35.5%	9 22.5%	20 28.2%
		Greater than 1/2 Mile	17 40.5%	7 22.6%	7 17.5%	14 19.7%

## Span Changes (4 lines)

### Line 18-Hillside

#### *Service Changes*

Weekday: Discontinue 8:39am trip and the 6:25pm from 18th & Morrison.

#### *Ridership Impacts*

Line	Change Type	Day	Ons	Offs	Total
<b>18</b>	Discontinue two (2) trips	Weekday	2	2	4

#### *Demographic Impacts*

Line	Change Type	Day	Tracts Minority	Minority Threshold	Tracts Poverty	Poverty Threshold
<b>18</b>	Discontinue two (2) trips	Weekday	15.7%	27%	<b>18.1%</b>	12.7%

#### *Available Service Alternatives*

On weekdays when these two trips are discontinued some riders may be able to utilize Lines 15 and 20 for a portion of their trips. For destinations not along W Burnside St. an additional walk may be required. About 70% of impacted stops are within ½ mile of alternative service on W Burnside St (Line 20) or NW 23<sup>rd</sup> Ave (Line 15). Figures below represent all trips.

Line	Day	Stops		Ons		Offs		Total	
		27	100.0%	10	100.0%	10	100.0%	20	100.0%
<b>Distance to Alternative Service</b>									
	Less than 1/4 Mile	15	55.6%	6	60.0%	7	70.0%	13	65.0%
	Between 1/4 and 1/2 Mile	4	14.8%	1	10.0%	0	0.0%	1	5.0%
	Greater than 1/2 Mile	8	29.6%	3	30.0%	3	15.0%	6	30.0%

## **Line 50-Cedar Mill**

### *Service Changes*

Weekday: Buses would run about every hour instead of every 30 minutes; discontinue 306pm, 345pm and 415pm trips from Sunset Transit Center.

### *Ridership Impacts*

Line	Change Type	Day	Ons	Offs	Total
<b>50</b>	Decrease frequency and span	Weekday	203	239	442

### *Demographic Impacts*

Line	Change Type	Day	Tracts Minority	Minority Threshold	Tracts Poverty	Poverty Threshold
<b>50</b>	Decrease frequency and span	Weekday	21.2%	27%	2.7%	12.7%

### *Available Service Alternatives*

For travel when weekday trips are discontinued some riders may be able to utilize Line 89 along NW Cornell Rd and NW Cedar Hills Blvd. However, for much of the route no viable alternatives exist. Figures below represent all trips.

Line	Day	Stops		Ons		Offs		Total	
		108	100.0%	203	100.0%	239	100.0%	442	100.0%
<b>Distance to Alternative Service</b>									
	Less than 1/4 Mile	33	30.6%	137	67.5%	181	75.7%	318	71.9%
	Between 1/4 and 1/2 Mile	14	13.0%	31	26.4%	11	4.6%	42	9.5%
	Greater than 1/2 Mile	61	56.5%	35	22.4%	47	19.7%	82	18.6%

## **Line 55-Hamilton**

### *Service Changes*

Weekday: Discontinue 600am trip from SW Apple Way & Laurelwood and 622pm trip from SW Columbia & 16th.

### *Ridership Impacts*

Line	Change Type	Day	Ons	Offs	Total
<b>55</b>	Discontinue two (2) trips	Weekday	18	18	36

### *Demographic Impacts*

Line	Change Type	Day	Tracts Minority	Minority Threshold	Tracts Poverty	Poverty Threshold
<b>55</b>	Discontinue two (2) trips	Weekday	18.3%	27%	19.2%	12.7%

### *Available Service Alternatives*

On weekdays when these trips are discontinued riders may be able to complete a portion of their trips on Line 54/56 (along SW Beaverton-Hillsdale Highway). Some trips may require an additional walk. Walking distances could vary from less than  $\frac{1}{4}$  mile to approximately  $\frac{3}{4}$  mile. Figures below represent all trips.

Line	Day	Stops		Ons		Offs		Total	
		106	100.0%	125	100.0%	117	100.0%	242	100.0%
<b>55</b>	Weekday								
<b>Distance to Alternative Service</b>									
	Less than 1/4 Mile	47	44.3%	64	51.2%	74	63.2%	138	57.0%
	Between 1/4 and 1/2 Mile	28	26.4%	33	26.4%	24	9.9%	57	23.6%
	Greater than 1/2 Mile	31	29.2%	28	22.4%	19	7.9%	47	19.4%

## **Line 59-Walker/Park Way**

### *Service Changes*

Weekday: Buses would run every 50-60 minutes instead of about every 40 minutes; first morning trip from Sunset TC at 650am instead of 555am and last trip at 819a instead of 914am; first afternoon trip from Sunset at 345pm instead of 238pm; first morning trip from Willow Creek TC at 615am instead of 532am, last trip at 751am instead of 832am, last afternoon trip at 510pm instead of 552pm.

### *Ridership Impacts*

Line	Change Type	Day	Ons	Offs	Total
<b>59</b>	Decrease frequency and span	Weekday	127	133	260

### *Demographic Impacts*

Line	Change Type	Day	Tracts Minority	Minority Threshold	Tracts Poverty	Poverty Threshold
<b>59</b>	Decrease frequency and span	Weekday	32.7%	27%	10.9%	12.7%

### *Available Service Alternatives*

On weekdays when these trips are discontinued riders may be able to complete a portion of their trips on Lines 52 (along SW 185<sup>th</sup> Ave), 62 (along SW 158<sup>th</sup> Ave), 67 (along SW Murray Blvd), and 20 (along SW Cedar Hills Blvd). Some trips may require an additional walk. Walking distances could vary from less than ¼ mile to approximately ¾ mile. Figures below represent all trips.

Line	Day	Stops		Ons		Offs		Total	
		57	100.0%	127	100.0%	133	100.0%	260	100.0%
<b>Distance to Alternative Service</b>									
	Less than 1/4 Mile	29	50.9%	97	76.4%	105	78.9%	202	77.7%
	Between 1/4 and 1/2 Mile	18	31.6%	26	20.5%	26	10.0%	52	20.0%
	Greater than 1/2 Mile	10	17.5%	4	3.1%	2	0.8%	6	2.3%

## Route and Span Changes (2 lines)

### Line 43-Taylors Ferry Rd

#### *Service Changes*

Weekday: Buses would run every 60-70 minutes instead of every 30-40 minutes during rush hours; in downtown Portland, buses would turn around at SW 5th & Harrison instead of SW Columbia & 16th; discontinue 605am, 631am trips from SW Columbia & 10th and 743pm trip from SW Columbia & 16th.

#### *Ridership Impacts*

Line	Change Type	Day	Ons	Offs	Total
<b>43</b>	Decrease frequency and span	Weekday	579	618	1,197
<b>43</b>	Discontinue segment	Weekday	141*	111*	252*

\*Included in the *Decrease frequency and span* totals

#### *Demographic Impacts*

Line	Change Type	Day	Tracts Minority	Minority Threshold	Tracts Poverty	Poverty Threshold
<b>43</b>	Decrease frequency and span	Weekday	20.8%	27%	16.5%	12.7%
<b>43</b>	Discontinue segment	Weekday	24.2%	27%	38.9%	12.7%

#### *Available Service Alternatives*

For travel on weekdays along the discontinued segment riders may use Line 6 along SW Columbia St and SW Jefferson St.

For weekday changes affecting the span of service, riders may be able to complete some trips using Line 35 along SW Macadam Blvd. Stops for the Line 35 are generally within ¼ mile of existing stops.

Alternative service along Taylors Ferry Rd between SW Macadam Ave and SW Barbur Blvd is less accessible. A walk of up to one mile may be necessary to access Line 12 stops on SW Barbur Blvd. Additionally, the segment of Taylors Ferry Rd between SW Barbur Blvd and Washington Square Transit Center has limited alternatives with walking distances of over one mile in some cases. Figures below represent all trips.

Line	Day	Stops		Ons		Offs		Total	
		169	100.0%	579	100.0%	618	100.0%	1,197	100.0%
<b>43</b>	Weekday								
<b>Distance to Alternative Service</b>									
	Less than 1/4 Mile	76	45.0%	438	75.6%	439	71.0%	877	73.3%
	Between 1/4 and 1/2 Mile	28	16.6%	37	6.4%	48	4.0%	85	7.1%
	Greater than 1/2 Mile	65	38.5%	104	18.0%	131	10.9%	235	19.6%

### **Line 82-Eastman/182<sup>nd</sup>**

#### *Service Changes*

Weekday: In East Multnomah County, Line 82 and Line 87 would be combined and called 87-Airport Way/181st. Buses would run between Gresham Transit Center and Gateway Transit Center along Eastman Parkway, 182nd/181st, and Airport Way. The line would have service all day from approximately 6 a.m. to 7 p.m.

#### *Ridership Impacts*

Line	Change Type	Day	Ons	Offs	Total
<b>82</b>	Route change	Weekday	6	5	11

#### *Demographic Impacts*

Line	Change Type	Day	Tracts Minority	Minority Threshold	Tracts Poverty	Poverty Threshold
<b>82</b>	Route change	Weekday	47.3%	27%	29.4%	12.7%

#### *Available Service Alternatives*

A single stop in Rockwood would no longer be served by Line 82. Stops on the new combined line are less than  $\frac{1}{4}$  mile from this stop.

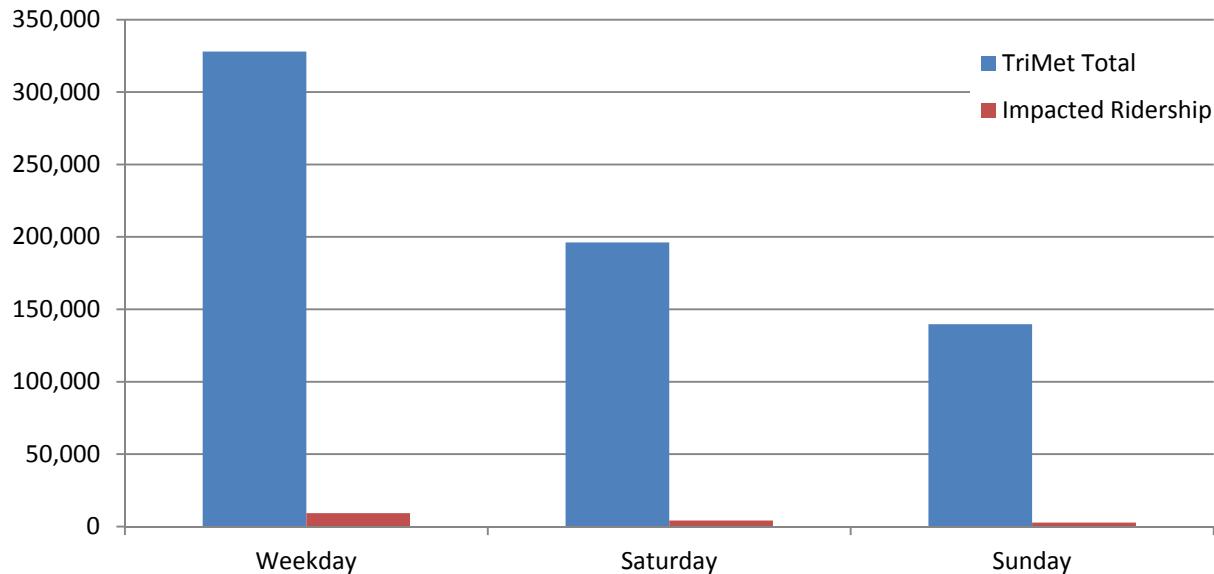
Line	Day	Stops		Ons		Offs		Total	
<b>82</b>	Weekday	1	100.0%	6	100.0%	5	100.0%	11	100.0%
<b>Distance to Alternative Service</b>									
	Less than 1/4 Mile	1	100.0%	6	100.0%	5	100.0%	11	100.0%
	Between 1/4 and 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	Greater than 1/2 Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%

## VI. Analysis Results – Service Changes

### System Level - Ridership Impacts

As shown in Figure 5, major service changes would impact an estimated 2 to 3 percent of system-wide daily boarding rides: on weekdays approximately 2.7% (8,820) of boardings; on Saturdays approximately 2.1% (4,028) of boardings, and; on Sundays approximately 1.9% (2,614) of boardings.

**Figure 5**  
**Total Ridership by Day of Week with Major Change Impacts**



### System Level - Equity Impacts

*At the system level no disparate Title VI impacts were identified.* When comparing impacted Title VI populations to impacted non-Title VI populations for weekday, Saturday and Sunday the overall percentages were within non-disparate thresholds. That is, impacted minority and poverty populations were within 20% of impacted non-Title VI populations.

System level impacts are profiled in Table 1 on the following page for minority and poverty populations, with impacts to Title VI and non-Title VI populations, relative to the non-disparate range of impact by day of service.

**Table 1**  
**System Level Equity Impacts of Major Service Changes**

Minority Assessment	Percent of Non-Minority Population Impacted	Non-Disparate Range	Percent of Minority Population Impacted	Disparate Impact?
Weekday	37.8%	30.2 – 45.4%	37.0%	No
Saturday	29.5%	23.6 – 35.4%	29.9%	No
Sunday	27.1%	21.7 – 32.5%	26.3%	No
Low-Income Assessment	Percent of Non-Low-Income Population Impacted	Non-Disparate Range	Percent of Low-Income Population Impacted	Disparate Impact?
Weekday	37.0%	29.6 – 44.4%	38.7%	No
Saturday	28.7%	23.0 – 34.4%	32.2%	No
Sunday	26.0%	20.8 – 31.3%	29.3%	No

## Route Level - Equity Impacts

*Potential Title VI impacts at the route level were found as a result of this analysis.* In these instances, recommended changes may impact minority and/or poverty populations disproportionately to their representation within TriMet's service area.

### Route Change Equity Impacts

Routes with major changes resulting in potential disproportionate impacts to both minority and low-income populations are 9, 16, 67, and 82. The following lines have potential disproportionate impacts to minority populations only: 6, 8, 47, 48, and 89. These lines have potential disproportionate impacts to low-income populations only: 12, 17, 70, 73, and 77.

### Span Change Equity Impacts

Line 59 is the only route with a major span of service change resulting in potential disproportionate impacts to only minority populations. Lines 18 and 55 have potential disproportionate impacts to low-income populations only. The recommended span changes to Line 50 have no disproportionate impacts.

### Route and Span Change Equity Impacts

For routes with both major route and span changes the Line 87 has potential disproportionate impacts to both minority and low-income populations. Line 43 has disproportionate impacts to low-income populations only.

## VII. Mitigations – Service Change Impacts

A primary goal in crafting this service reduction proposal was the preservation of service to minimize the impact to TriMet's riders. The recommended changes take into account ridership, the availability of alternative service, as well as the use of the service for work and school trips.

Although at the system level no disparate impacts were identified, at the route level there are 19 of 20 lines where the recommended changes may impact minority and/or low-income populations disproportionately. Mitigation of these impacts is part of the proposal's design.

### Availability of Alternative Service

*Of the 19 routes identified as having potential disproportionate impacts, 13 lines (nearly two-thirds) have alternative service for most impacted stops available either at the stop (6 lines), or within a quarter-mile-walk (8 lines). On the other five (5) lines, one-half or more of impacted stops have alternative service available within a half mile or less. In other cases an additional transfer may be needed to complete a particular trip. While this may not be an ideal solution from an individual rider's perspective it allows TriMet to preserve access to mobility for the broadest group of riders.*

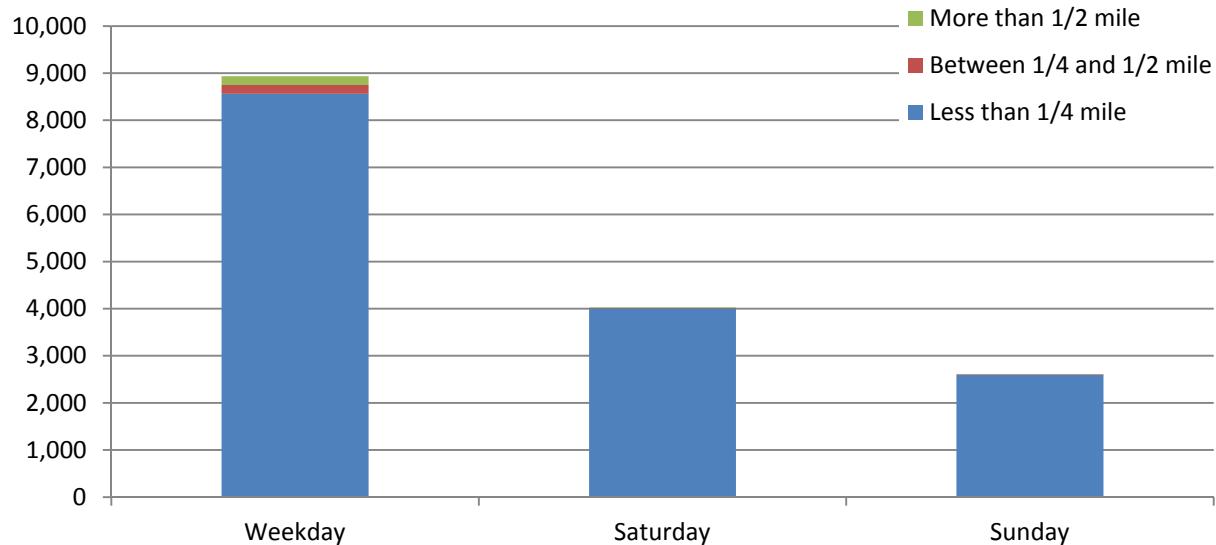
*The routes and route segments that do not have alternative service nearby generally have very low ridership thus the total number of impacted rides is small.*

Additionally, some of the route changes will improve connectivity for some riders allowing them to make certain trips quicker and with fewer or no transfers.

As shown in Figure 6, following, most all impacted rides would have alternative service available within less than  $\frac{1}{4}$  mile walking distance:

- Weekdays; 95.8% with alternative service within  $\frac{1}{4}$  mile;
- Saturdays; 99.6% with alternative service within  $\frac{1}{4}$  mile within  $\frac{1}{4}$  mile, and;
- Sundays; 99.3% with alternative service within  $\frac{1}{4}$  mile.

**Figure 6**  
**Walking Distance for Impacted Ridership**



Among the 20 lines with recommended major changes, the availability of alternative services for impacted stops is further summarized in Table 2. *On six (6) lines, rides involving impacted stops are fully covered, and on another 8 lines alternative service for 75% or more of impacted boardings and alightings is available within  $\frac{1}{4}$  mile. Five other lines have alternative service available of 50% or more of impacted boardings and alightings.*

**Table 2**  
**Alternative Service Availability**

Level of Alternative Service Available For Impacted Stops	Number of Lines
<b>Fully Covered</b> (All impacted stops directly served by one or more other lines, with similar span of service. Trips may require a transfer.)	6
<b>High</b> (Alternative service within $\frac{1}{4}$ mile or less walking distance for 75% or more of impacted boardings and alightings. Trips may require a transfer.)	8
<b>Medium</b> (Alternative service within $\frac{1}{2}$ mile walking distance for at least 50% of impacted boardings and alightings. Trips may require a transfer.)	5
<b>Low</b> (Alternative service greater than $\frac{1}{2}$ mile walking distance for 50% or more of impacted boardings and alightings. Trips may require a transfer.)	<sup>1</sup> 1

Notes: <sup>1</sup>This line has no disproportionate impacts.

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Table 3 shows the levels of alternative service available for each of the impacted lines and/or segments of lines by weekday, Saturday, and Sunday.

**Table 3**  
**Level of Alternative Service Available; All Lines with Major Changes**  
**Weekday, Saturday and Sunday**

Line Number-Name	Impacted Minority	Impacted Poverty	Availability of Alternative Service		
			Weekday	Saturday	Sunday
<b>Route Changes:</b>					
6-Martin Luther King Jr Blvd	35.5%	12.3%	H	H	H
8-Jackson Park/NE 15 <sup>th</sup>	43.7%	12.4%	H	H	H
9-Powell/Broadway	28.1%	18.7%	FC	FC	FC
12-Barbur/Sandy Blvd	24.4%	13.9%	FC	FC	FC
16-Front Ave/St Johns	30.8%	21.9%	H	NA	NA
17-Holgate/NW 21 <sup>st</sup>					
NW Portland	19.8%	20.7%	FC	FC	NA
St Helens Rd	19.8%	20.7%	FC	FC	NA
47-Baseline/Evergreen	36.5%	10.5%	H	NA	NA
48-Cornell	36.5%	10.5%	FC	FC	NA
67-Jenkins/158 <sup>th</sup>	40.6%	16.6%	H	H	NA
70-12th Ave	20.8%	13.0%	FC	FC	FC
73-NE 33rd Ave	20.8%	13.0%	FC	FC	FC
77-Broadway/Halsey	18.2%	19.3%	H	H	H
82-Eastman/182 <sup>nd</sup>	47.3%	29.4%	H	NA	NA
89-Tanasbourne	28.4%	5.0%	H	M	M

**Table 3 - Continued**

Line Number-Name	Impacted Minority	Impacted Poverty	Availability of Alternative Service		
			Weekday	Saturday	Sunday
<b>Span and/or Frequency Changes:</b>					
18-Hillside	15.7%	18.1%	M	NA	NA
50-Cedar Mill	21.2%	2.7%	L	NA	NA
55-Hamilton	18.3%	19.2%	M	NA	NA
59-Walker/Park Way	32.7%	10.9%	H	NA	NA

**Route and Span Changes:**

43-Taylors Ferry Rd

Route Change	24.2%	38.9%	M	NA	NA
Span Change	20.8%	16.5%	M	NA	NA
87-Airport Way/181st	47.3%	29.4%	H	NA	NA

**Notes:**

Cell shading denotes populations exceeding TriMet service area thresholds for minority and low-income, respectively:

Population	Threshold
Minority	27%
Low-income	12.7%

## **VIII. Background and Methodology – Fare Changes**

TriMet reviews fares annually to ensure fare levels keep pace with increases in the cost of operating the transit system. Fare adjustments to cover general increases in the cost of providing service regularly occur in September of each year, and TriMet customers have become accustomed to increases of at least five cents annually. Additional fare increases beyond the usual five cents have been approved in order to cover other unanticipated costs, such as for drastic and unexpected increases in the price of diesel fuel.

For Fiscal Year 2013, TriMet is facing considerable budget challenges due to a number of factors. A lower payroll tax forecast due to high unemployment, in addition to anticipated cuts in federal funding and higher wages and health care costs for union employees, are projected to create a budget shortfall of between \$12 million to \$17 million in the next fiscal year.

TriMet is considering fare changes that, if approved, would become effective September 1, 2012. The last change in fixed route fares occurred September 1, 2011, with cash fares increasing five cents. LIFT paratransit cash fares increased thirty cents April 1, 2012.

Recommended fare changes are analyzed to determine whether changes may have disproportionate impacts on minority and low-income populations. Recommended price changes in fares by passenger category and payment option are compared with current pricing, and the percentage change is calculated for each category/option. Analysis is then conducted to determine whether changes in specific fare categories or payment media would disproportionately impact minority and low-income individuals. Mitigation measures are then recommended. Data on the use of fare options by minority and low-income riders is from origin-destination surveys of trips conducted during the period 2000 – 2006. Statistically significant differences are noted where present.

## **IX. Analysis – Fare Changes**

### **Recommended Fare Changes**

The fare changes recommended for September 2012 include changes to generate revenues of approximately \$8.7 million to help fill a potential budget gap of \$12 million to \$17 million in the next fiscal year.

The changes include:

- General fare increases across all fare categories, except Honored Citizens (persons age 65+, persons with a disability, or persons with a Medicare card);
- Eliminate fare zones and implement a flat fare for adults;
- Eliminate the Free Rail Zone in downtown Portland and the Lloyd District;
- Introduce a Day Pass for all fare categories, priced at only twice the single trip fare; and
- Introduce a new 7-Day Pass for Youth and Honored Citizens.

TriMet's initial budget proposal considered limiting single trip tickets to travel in one direction only. Under that proposal, all tickets and transfers would be valid within the expiration time to make a trip in one direction, and a return trip ("round-trip") would not be allowed on the same fare. The initial proposal was based on a potential budget shortfall of \$17 million in the next fiscal year, whereas the recommended plan totals \$12 million in savings. Public feedback indicated the change to one-way tickets was the least attractive option among fare changes initially proposed, and restricting single trip fares to travel in one direction has not been included in the revised proposal.

The amount of revenue generated from fare adjustments directly impacts the level of transit service that needs to be reduced to balance the budget. While increasing fares can be a difficult financial hardship for those least able to afford the changes, TriMet is committed to implementing an approach that balances affordable fares for those who depend on the system, with maintaining adequate service levels on the street to get people where they need to go. Public feedback throughout the budget development and comment process has supported a preference for increasing fares if it means retaining service on the street. However, TriMet is proposing several strategies to help ease the burden of higher fares.

Current and recommended fares with percentage of increase, as well as usage by group, are shown in Table 4 on the next page. The estimated added revenue from fare changes shown in Table 4 is anticipated to be approximately \$6 million annually. Eliminating the Free Rail Zone is anticipated to generate an additional \$2.7 million.

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**Table 4**  
**Current and Recommended Fares**

Fare Option and Category	Current Effective September 2011	Recommended Effective September 2012	Increase Amount	% Increase	Low-Income (<\$20K)	Minority	Usage by Group Overall
<b>CASH</b>							
2-Zone	\$2.10	\$2.50 <sup>1</sup>	\$0.40	19.0%	21.9%	18.9%	16.3%
All-Zone	\$2.40	\$2.50 <sup>1</sup>	\$0.10	4.2%	12.7%	12.7%	10.6%
Youth	\$1.50	\$1.65	\$0.15	10.0%	3.9%	7.4%	4.6%
Honored Citizen	\$1.00	\$1.00	\$0.00	0.0%	4.5%	2.3%	2.9%
<b>DAY PASS</b>							
All-Zone	\$5.00	\$5.00 <sup>1</sup>	\$0.00	0.0%	1.7%	1.6%	1.4%
Youth	N/A	\$3.30					
Honored Citizen	N/A	\$2.00					
<b>TICKETS (Book of 10)</b>							
1-Zone	\$20.50	\$25.00 <sup>1</sup>	\$4.50	22.0%	0.9%	0.6%	0.9%
2-Zone	\$21.00	\$25.00 <sup>1</sup>	\$4.00	19.0%	3.3%	2.5%	3.5%
All-Zone	\$24.00	\$25.00 <sup>1</sup>	\$1.00	4.2%	2.3%	2.7%	3.0%
Youth	\$15.00	\$16.50	\$1.50	10.0%	0.3%	1.0%	0.6%
Honored Citizen	\$10.00	\$10.00	\$0.00	0.0%	1.2%	0.5%	1.0%
<b>7-DAY PASS</b>							
2-Zone	\$21.00	\$26.00 <sup>1</sup>	\$5.00	23.8%	0.2%	0.1%	0.1%
All-Zone	\$24.00	\$26.00 <sup>1</sup>	\$2.00	8.3%	0.3%	0.2%	0.2%
Youth	N/A	\$8.00					
Honored Citizen	N/A	\$7.00					
<b>14-DAY PASS</b>							
2-Zone	\$41.00	\$51.00 <sup>1</sup>	\$10.00	24.4%			
All-Zone	\$46.50	\$51.00 <sup>1</sup>	\$4.50	9.7%			
Youth	\$14.00	\$15.50	\$1.50	10.7%			
Honored Citizen	\$13.50	\$13.50	\$0.00	0.0%			
<b>HALF MONTHLY PASS</b>							
2-Zone	\$41.50	Eliminated					
All-Zone	\$47.00	Eliminated					
Youth	\$14.50	Eliminated					
Honored Citizen	\$14.00	Eliminated					
<b>MONTHLY PASS</b>							
2-Zone	\$81.00	\$100.00 <sup>1</sup>	\$19.00	23.5%	7.8%	7.5%	8.6%
All-Zone	\$92.00	\$100.00 <sup>1</sup>	\$8.00	8.7%	9.7%	11.3%	12.8%
Youth	\$27.00	\$30.00	\$3.00	11.1%	3.5%	7.1%	5.0%
Honored Citizen	\$26.00	\$26.00	\$0.00	0.0%	10.5%	4.8%	6.0%
<b>ANNUAL PASS</b>							
2-Zone	\$891.00	\$1,100.00 <sup>1</sup>	\$209.00	23.5%	0.0%	0.1%	0.4%
All-Zone	\$1,012.00	\$1,100.00 <sup>1</sup>	\$88.00	8.7%	3.7%	9.3%	11.5%
Youth	N/A	\$330.00					
Honored Citizen	\$286.00	\$286.00	\$0.00	0.0%	0.5%	0.2%	0.3%

Data is not available for all fare media. Note: <sup>1</sup> Effective September 1, 2012 this would be a single Adult fare option; 2-Zone and All-Zone are shown for 2012 to illustrate price increases from current fares.

As noted, Honored Citizen fares (for senior citizens aged 65+, persons with a disability, or persons with a Medicare card) would not increase in September 2012. TriMet proposed in June 2011 to increase LIFT paratransit fares to \$3 over three years and eliminate the unlimited use LIFT monthly pass. However, the proposal was revised based on public feedback and Board input. At their meeting on December 21, 2011, the TriMet Board's advisory Committee on Accessible Transportation (CAT) voted to recommend a revised LIFT fare increase proposal, to increase the LIFT cash fare until it reaches the same level as the adult all-zone cash fare (currently \$2.40). The CAT also recommended that the Honored Citizen cash, ticket and pass fares not be increased during the transition to higher LIFT fares, in order to make it easier for the elderly and people with disabilities to use fixed-route service.

## **Analysis of Recommended Fare Changes**

### **Impacts of Fare Increases on Minority Populations**

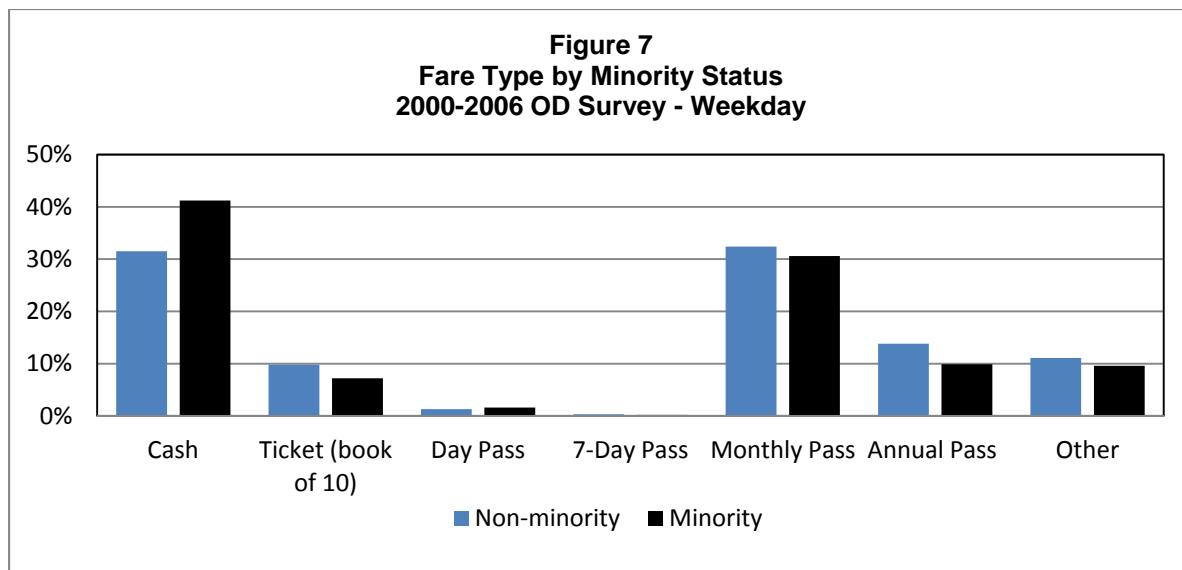
Data for Fare Type by Minority Status is displayed in Figure 7 and listed in Table 5, following. Differences that are statistically significant at the 95% confidence level are shown in bold font in Table 5. Trips by minorities are more likely than non-minorities to be made with a cash fare (41% for minorities, compared to 32% for non-minorities), and less likely to be made using other pre-paid tickets and passes. In addition, trips taken by minorities are more likely to be made with a Day Pass than trips for non-minorities.

*Impacts: A possible disparate impact is noted in regard to cash payers that are more likely to be minority, particularly for 2-zone cash fares that will have a higher proportionate increase. However, it should be noted that this proposal would increase cash fares proportionately less than pass fares.*

*Mitigation and alternatives: TriMet will introduce unlimited ride Day Passes (priced at only twice the single ride cash fare) and 7-Day Passes for all fare categories. Day Passes and 7-Day Passes will be new options for both Honored Citizens and Youth. Day Passes will provide Youth and Honored Citizen cash payers with a convenient and economical alternative to paying for each ride separately, with the added benefit of unlimited rides during the day for the price of a roundtrip, a significant financial benefit for customers making multiple trips during the day. Similarly, the Day Pass price for Adults will not increase and will remain at \$5.00, providing unlimited rides throughout the day for only twice the single fare.*

*The Day Pass and 7-Day Pass options both offer additional payment and unlimited ride alternatives, and prospective mitigations for low-income and minority persons. The new Day Pass offers a prospective mitigation for low-income and minority persons currently using single-ride cash fares or tickets. Providing a 7-Day Pass for each fare category offers another new unlimited ride product, for less than the upfront cost of a monthly pass.*

In addition, though monthly passes are recommended to increase proportionately more than cash fares, they provide a significant value for many riders. TriMet survey data shows that adults make on average 60 trips per month on a monthly pass. Adult monthly passes would be priced at 40 single trips per month, providing on average the equivalent of about 20 "free" trips. Other unlimited ride pass products provide a substantial benefit available to monthly pass users.



**Table 5**  
**Fare Type by Minority Status**

Fare Type	Non-minority	Minority
Cash	32%	<b>41%</b>
Ticket (book of 10)	<b>10%</b>	7%
Day Pass	1%	2%
7-Day Pass	0%	0%
Monthly Pass	<b>32%</b>	31%
Annual Pass	<b>14%</b>	10%
Other	<b>11%</b>	10%

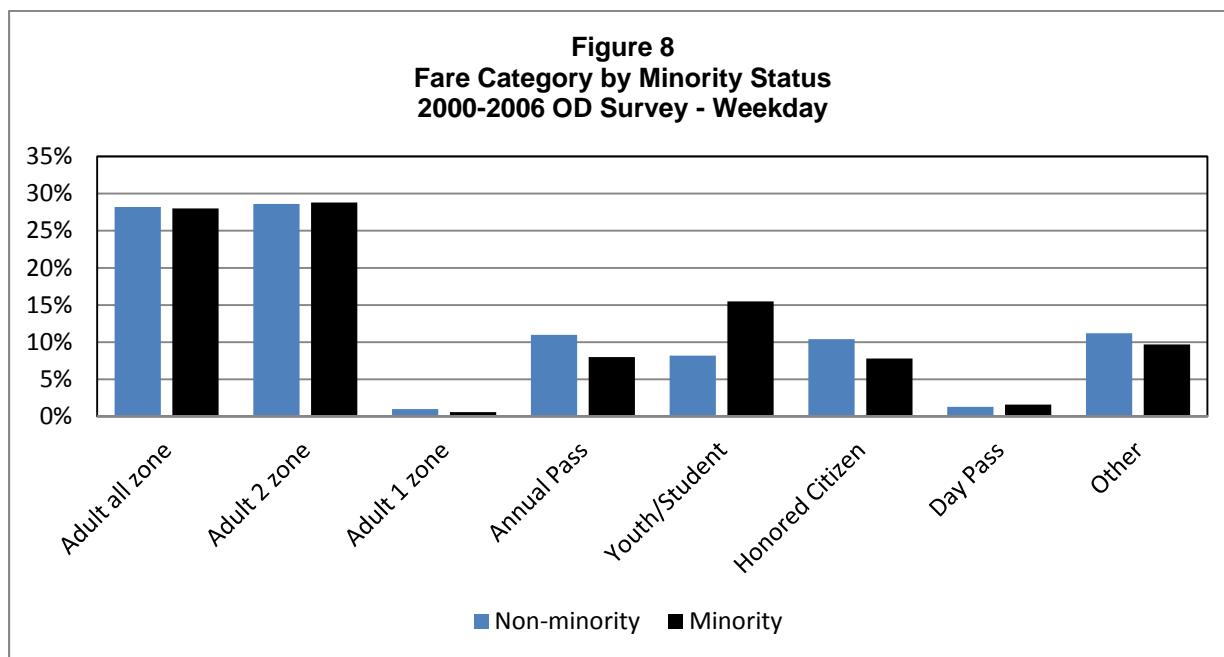
*Bold = statistically significant difference at the 95% confidence level*

*Weighted to originating rides; non-minority, n=147,101; minority, n=53,355*

Data for Fare Category by Minority Status is displayed in Figure 8 and shown in Table 6. Differences that are statistically significant at the 95% confidence level are shown in bold font in Table 6. Trips by minority and non-minority populations are equally as likely to be made using All-Zone fares (both 28%), 2-Zone fares (both 29%), 1-Zone fares (both 1%), and Day Passes (no statistically significant difference).

*Impacts: Adult fares are equally as likely to be used by minorities and non-minorities, and recommended increases across fare categories would have no apparent disparate impact for minority populations.*  
 Youth fares appear more likely to be used by minorities.

*Mitigation and alternatives:* Since 2010, all high school students in the Portland Public School District (PPS) have received free transit passes. This pass program is currently funded by the PPS Department of Student Transportation, and by a special Business Energy Tax Credit Program through the State of Oregon Department of Energy. PPS does not provide regular yellow school bus service for high school students, and TriMet is the primary source of transportation to school for many students.



**Table 6**  
**Fare Category by Minority Status**

Fare Category	Non-minority	Minority
Adult all zone	28%	28%
Adult 2 zone	29%	29%
Adult 1 zone	1%	1%
Annual Pass	<b>11%</b>	8%
Youth/Student	8%	<b>15%</b>
Honored Citizen	<b>10%</b>	8%
Day Pass	1%	2%
Other	<b>11%</b>	10%

*Bold = statistically significant difference at the 95% confidence level*

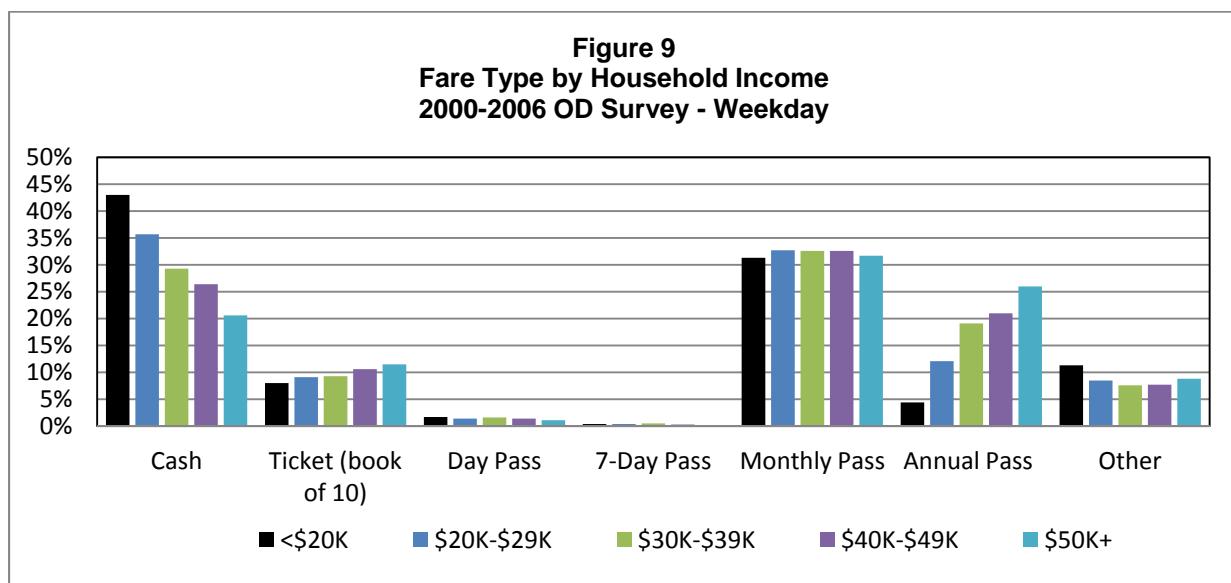
*Weighted to originating rides; non-minority, n=147,101; minority, n=53,355*

### Impacts of Fare Increases on Low-Income<sup>1</sup> Populations

Data for Fare Type by Household Income is displayed in Figure 9 below and shown in Table 7, following. Trips made by individuals at lower income levels are more likely to be made using a cash fare. However, there is little difference by income level for trips made using Day Passes, 7-Day Passes, and Monthly Passes. Although the difference is not statistically significant, individuals at lower income levels (<\$20,000) are somewhat more likely to use Day Passes than those at higher income levels. The Day Pass is not recommended to increase.

*Impacts: A possible disparate impact is noted in regard to cash payers that are more likely to be low-income, particularly for 2-zone cash fares that will have a higher proportionate increase. However, it should be noted that this proposal would increase cash fares proportionately less than pass fares.*

*Mitigation and alternatives: As mentioned before, the new Day Pass (priced at only twice the single cash fare) and 7-Day Pass options offer additional payment and unlimited ride alternatives, and prospective mitigations for low-income and minority persons. The new Day Pass offers a prospective mitigation for low-income and minority persons currently using single-ride cash fares or tickets. Providing a 7-Day Pass for each fare category offers another new unlimited ride product, for less than the upfront cost of a monthly pass.*



Note: <sup>1</sup> Federal HHS poverty guidelines vary by household size. The base level is \$10,890 for a one-person household, increasing by \$3,820 for each additional person. For example, the poverty guideline for a family of four is \$22,350. The poverty threshold is defined based on both family size and age composition. For example, the poverty threshold for a four-person family with two children under age 18 is \$22,113. For purposes of this fare analysis, low-income is considered to be "less than \$20,000" which corresponds to a break point in the available TriMet survey data.

**Table 7**  
**Fare Type by Household Income**

Fare Type	<\$20K A	\$20K-\$29K B	\$30K-\$39K C	\$40K-\$49K D	\$50K+ E
Cash	43%	36%	29%	26%	22%
Significance	BCDE	CDE	DE	F	
Ticket (book of 10)	8%	9%	10%	11%	11%
Significance			A	AB	AB
Day Pass	2%	1%	1%	1%	1%
Significance	E				
7-Day Pass	0%	0%	0%	0%	0%
Significance	E				
Monthly Pass	31%	33%	32%	32%	30%
Significance		E			
Annual Pass	4%	12%	18%	20%	25%
Significance		A	AB	AB	ABCD
Other	11%	9%	10%	10%	11%
Significance	BCD				BCD

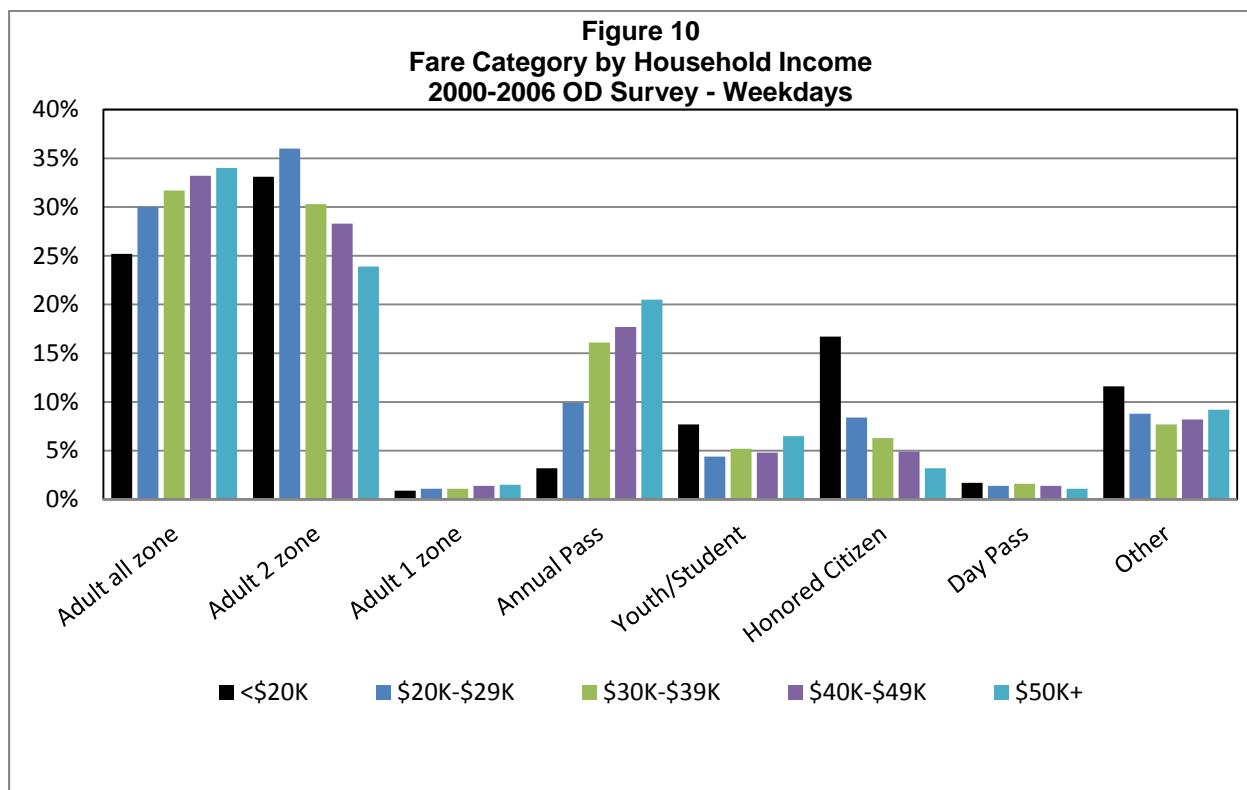
ABCDE = statistically significant differences between columns at the 95% confidence level

Weighted to originating rides; <\$20K, n=65,533; \$20K-\$29K, n=26,358; \$30K-\$39K, n=19,332; \$40K-\$49K, n=14,302; \$50K+, n=46,520

Data for Fare Category by Household Income is displayed in Figure 10 and shown in Table 8, following. Trips by low-income individuals are somewhat more likely to be made with a 2-Zone fare than an All-Zone fare (33% compared to 25%). Trips made using an Honored Citizen fare are also more likely to be made by individuals at lower income levels; however, Honored Citizen fares are not recommended to increase in 2012.

*Impacts:* Low-income populations may be more likely to use a 2-zone fare. A possible disparate impact is noted in regard to 2-zone payers that will have a higher proportionate increase, particularly those that pay with cash. However, there is no difference by income level for trips made using multi-ride passes. It should be noted that this proposal would increase cash fares proportionately less than pass fares.

*Mitigation and alternatives:* Introducing unlimited ride Day Passes for each category, priced at only twice the cash fare, will offer cash payers an attractive economical alternative with the benefit of an unlimited-ride pass. Providing 7-Day Passes for each category offers another new unlimited ride product, for less than the upfront cost of a monthly pass.



**Table 8**  
**Fare Category by Household Income**

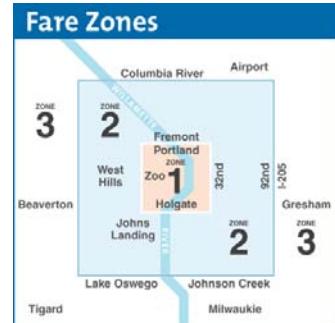
Fare Category	<\$20K	\$20K-\$29K	\$30K-\$39K	\$40K-\$49K	\$50K+
	A	B	C	D	E
Adult all zone	25%	30%	31%	33%	33%
Significance		A	A	A	AB
Adult 2 zone	33%	36%	30%	29%	23%
Significance	CDE	ACDE	E	E	
Adult 1 zone	1%	1%	1%	1%	1%
Annual Pass	3%	10%	15%	16%	20%
Significance		A	AB	AB	ABCD
Youth/Student	8%	4%	6%	5%	6%
Significance	BCDE		B		BD
Honored Citizen	17%	8%	6%	5%	3%
Significance	BCDE	CDE	DE	E	
Day Pass	2%	1%	1%	1%	1%
Significance	E				
Other	12%	9%	10%	10%	12%
Significance	BCDE				BCD

ABCDE = statistically significant difference between columns at the 95% confidence level  
 Weighted to originating rides; <\$20K, n=65,533; \$20K-\$29K, n=26,358; \$30K-\$39K, n=19,332; \$40K-\$49K, n=14,302; \$50K+, n=46,520

## Impacts of Eliminating Fare Zones and Implementing a Flat Fare

### Current Zone Fare System

Currently, TriMet's service area is divided into three fare zones, organized in roughly concentric circles around central Portland. A separate Free Rail Zone is within Zone 1 (that boundary is not depicted here). Adult fares are based on the number of zones travelled in. Honored Citizen and Youth fares are valid in all zones.



For example:

- If you are an adult and want to travel from Gresham Transit Center to downtown Portland, your trip would require an all-zone fare, because you are traveling in all 3 fare zones.
- If you are an adult travelling across 1 zone boundary or within a single zone and paying for a single trip, you would need a 2-zone fare. In addition, customers purchasing a pre-paid 2-zone pass must choose between zones 1-2 or zones 2-3.
- Adult riders can buy an upgrade for a 2-zone pass by paying the 30 cent cash fare difference. This is a convenience for someone who typically buys a 2-zone pass and makes an occasional all-zone trip (such as to the airport).
- Honored Citizens and Youth riders do not need to worry about zones, as these fares are valid everywhere.

### Flat Fare System

Eliminating zones and moving to a flat fare would have a number of significant advantages, including:

- *Simplicity*; easier for customers to understand and for personnel to administer;
- *Consistency*; users would pay a uniform amount and present variations in fare amounts for trips of similar distances would be eliminated, and;
- *Compatibility* with a future electronic fare system.

#### ***Simplicity:***

- The primary advantage of a flat fare is that it is easy to understand and administer. A zone-based fare structure is confusing for new customers, thereby acting as a barrier to attracting new riders to the system. Public feedback has overwhelmingly supported the proposal to shift to a simpler flat fare system.
- Zones can be confusing even for bus operators, who need to keep track of where a person boarded and how they paid.
- Eliminating zones simplifies the system for customers, and improves the system for personnel by simplifying fare policies and reducing the variety of fare media that must be identified, ultimately helping to streamline revenue collection.
- TriMet estimates that over 1 million trips each year are taken in more zones than were actually paid for, intentionally or unintentionally, which leads to revenue loss for the agency.

**Consistency:**

- The customer knows how much the fare will be for every ride. The intent of a zone system is to charge someone based on how far they travel, however, TriMet's zone system is not consistently effective at capturing trip distance, and unfairly penalizes those that live near a zone boundary.
- For example, a person who lives in zone 3 can travel a great distance without crossing a zone boundary. A rider can travel from the Sunset Transit Center to Forest Grove, a distance of about 16 miles, and stay entirely in zone 3. On the other hand, that same rider can travel from Sunset Transit Center to the Oregon Zoo, less than 3 miles away, and travel through three zones, which requires an all-zone fare.
- A person who lives near a zone boundary could travel only three blocks and cross that boundary, and travel in two zones. However, a customer riding the line 70 for example, beginning at NE 82<sup>nd</sup> and Killingsworth and travelling to SE 82<sup>nd</sup> and Johnson Creek, a trip of about 7 miles, would remain entirely in zone 2.

**Migration to Electronic Fare Collection**

- A flat fare would help pave the way for easier implementation of Electronic Fare Collection (smart cards), by eliminating the need to "tap off" and the costly investment of additional card readers, and avoiding the complex calculations and software programming required to implement a distance-based system.

**Service Design and Demographic Changes**

- The current fare zones have remained the same since the early 1980s – 30 years ago – while TriMet's service level and design have changed significantly.
- The region's demographics have also shifted dramatically over this time. Thirty years ago, Portland's per capita median income was among the lowest in the region. Now, the per capita income of Forest Grove, Milwaukie, Gresham, and Hillsboro residents is significantly lower than for residents in Portland.
- A flat fare may help reduce these disparities, as eliminating fare zones provides a more equitable system for those individuals who live in the suburbs (who have become increasingly more likely to be low-income and minority) and travel great distances.

**Impacts on Minority Populations**

In implementing a flat fare structure, individuals purchasing a 2-zone fare would pay proportionately more than someone who currently pays with an all-zone fare. As shown in Figure 8 and in Table 6 on page 51, trips by minority and non-minority populations are equally as likely to be made using all-zone fares (both 28%), 2-zone fares (both 29%), 1-zone fares (both 1%), and Day Passes (no statistically significant difference). *However, a possible disparate impact is noted in regard to cash payers that are more likely to be minority (Figure 7, Table 5 on page 50), particularly for 2-zone cash fares that will have a higher proportionate increase (Table 4 on page 48).* It should be noted that this recommendation would increase cash fares proportionately less than pass fares.

### Impacts on Low-Income Populations

Trips made by low-income populations are more likely to be with 2-zone fares than all-zone fares (33% compared to 25% as shown in Table 8 on page 54). *A possible disparate impact is noted in regard to 2-zone payers that will have a higher proportionate increase, particularly those that pay with cash.* However, there is no difference by income level for trips made using multi-ride passes. It should be noted that the recommended plan would increase cash fares proportionately less than pass fares.

The impact of the recommended changes for low-income and minority populations would be mitigated by the following:

- Introducing unlimited ride Day Passes for each category, priced at only twice the cash fare, will provide single-trip cash payers with a significant economical benefit and an attractive alternative to paying for each ride with a cash fare, by offering cash payers the benefit of an unlimited-ride pass. Day Passes for adults are not recommended to increase in September 2012, and would remain at \$5.00.
- Extending transfer times on buses to two hours will provide many cash and ticket payers with an additional benefit over the current transfer policy (described further below).
- Eliminating the Free Rail Zone reduces the need for additional fare increases and service cuts that would adversely impact low-income riders throughout the service district.
- To reduce the need for additional fare increases and service cuts that would adversely impact low-income riders throughout the service district, TriMet has increased administrative cuts from \$500,000 to \$1.2 million.
- For September 2012, TriMet will explore increasing the program discount to social service agencies from 5% to 10%, and will consider expanding program eligibility requirements to ensure that more community-based organizations that focus on providing services to low-income clients will be able to participate. With additional community outreach and education, TriMet hopes to work with organizations that serve homeless and/or low income persons, to help their clients access services critical to personal and residential stability.
- TriMet has undertaken a number of other strategies to decrease the impact of fare increases on low-income individuals, discussed further below under **Section XI. Mitigation Strategies**.

### Impacts of Elimination of the Free Rail Zone

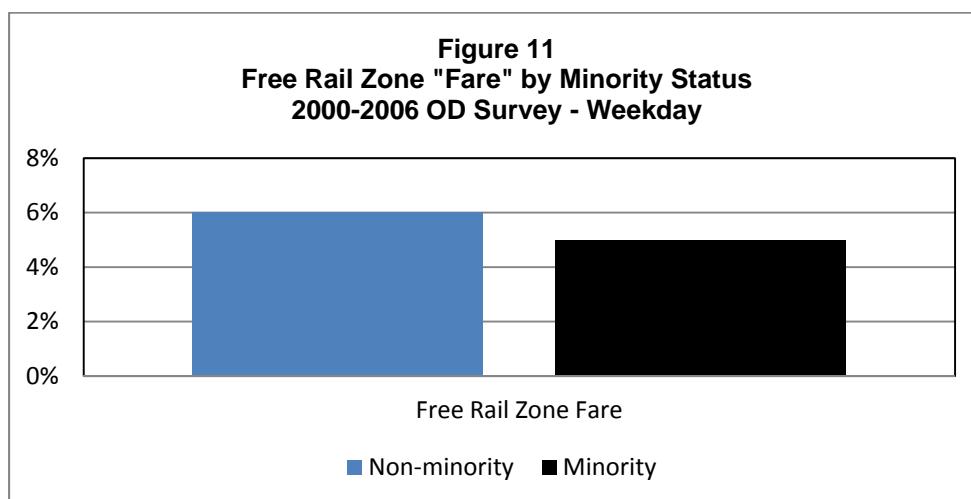
Fareless Square (now the Free Rail Zone) was created in 1975 primarily as an air quality strategy to reduce carbon monoxide emissions from cars. The policy objectives were to encourage transit use and reduce air pollution from cars; to make travel within downtown easier for commerce, retail and recreational purposes; and to promote development in the downtown core.

All bus and rail trips that began and ended within Fareless Square were free, all day every day. The free fare area included most of downtown Portland as well as a portion of the Lloyd District on the eastside, encompassing about 330 square blocks. In January 2010, Fareless Square became the Free Rail Zone, as free rides were no longer provided on buses. The opening of the Green Line light rail service in downtown Portland provided improved rail service on the Transit Mall downtown that was previously available only by bus. It is one of the largest free fare areas of its kind in the country. The closest-by comparison, Seattle's Ride Free area is anticipated to end in October 2012.

Since free transit was established, downtown Portland and the region have changed dramatically. TriMet now operates a comprehensive light rail system, the bus system has been greatly expanded, and the Portland Streetcar provides transit service downtown. While transit service has also improved in the suburbs where minority and low-income populations have become more concentrated, the Free Rail Zone continues to be a benefit primarily for those that live and work downtown, where income levels have continued to rise. Free transit service in the downtown core does not provide an equal benefit for someone who relies on transit and lives in suburban communities, such as Gresham, Beaverton or Hillsboro. Elimination of the Free Rail Zone is anticipated to generate approximately \$2.7 million, which would help to avoid additional service cuts in all areas of TriMet's service district. Eliminating the Free Rail Zone would impact only 5% of TriMet's ridership, while \$2.7 million in service cuts would impact far more minority and low-income individuals throughout the region.

### Impacts of Eliminating Free Rail Zone on Minority Populations

Data for Free Rail Zone "Fare" by Minority Status is shown in Figure 11 and listed in Table 9. Minorities are less likely than non-minorities to be making a trip for free in the Free Rail Zone (5% compared to 6%). *Consequently, elimination of the Free Rail Zone would have no apparent disparate impact on minority populations.*



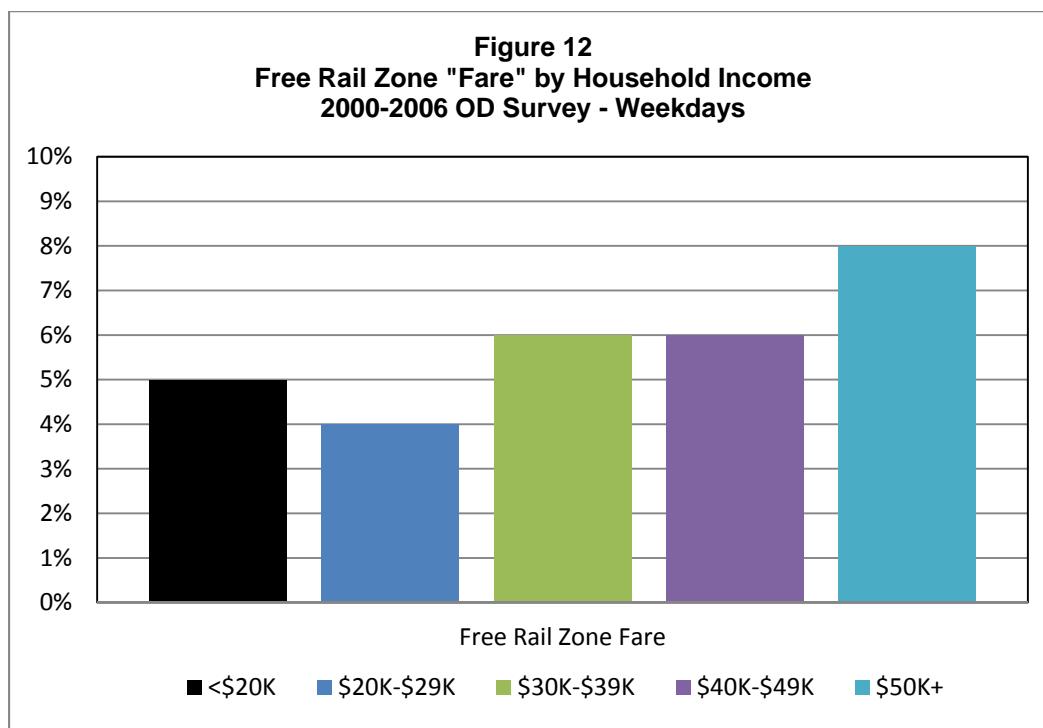
**Table 9**  
**Free Rail Zone "Fare" by Minority Status**

	<b>Non-minority</b> n=8,327	<b>Minority</b> n=2,530	
Free Rail Zone Fare	<b>6%</b>	<b>5%</b>	
<i>Bold = statistically significant difference at the 95% confidence level</i>			
<i>Weighted to originating rides</i>			

### Impacts of Eliminating Free Rail Zone on Low-Income Populations

Data on Free Rail Zone "Fare" by Household Income is shown in Figure 12 and listed in Table 10 following. Persons at lower income levels (<\$20,000) are less likely to be making a free trip in the Free Rail Zone than are individuals at higher income levels (5%, compared to 8% for \$50,000+). *Therefore, elimination of the Free Rail Zone would have no apparent disparate impact on low-income populations.*

To mitigate the impact of eliminating Free Rail to the elderly and people with disabilities, TriMet will extend the Honored Citizen Downtown Pass Program to preserve free trips on rail for these individuals. To be eligible, customers must qualify as a TriMet Honored Citizen (senior citizen aged 65 and older, person with a disability, or person with a Medicare card), and be able to show proof of residence within the boundaries of the free fare area. The program to maintain free transit service for seniors and people with disabilities ensures that the most vulnerable citizens, many of whom are transit dependent, will continue to have the same access to transit to get to much needed services in the downtown area, including access to medical care, shopping and social services.



**Table 10**  
**Free Rail Zone "Fare" by Low-Income Status**

	<\$20K A	\$20K-\$29K B	\$30K-\$39K C	\$40K-\$49K D	\$50K+ E
Free Rail Zone Fare	5%	4%	6%	6%	8%
Significance			AB	B	ABCD

ABCDE = statistically significant difference between columns at the 95% confidence level

Weighted to originating rides; <\$20K, n=3,088; \$20K-\$29K, n=1,126; \$30K-\$39K, n=1,208; \$40K-\$49K, n=804; \$50K+, n=3,526

### **Extending Bus Transfer Times for Cash and Ticket Fares**

*TriMet is proposing to extend transfer times on buses to two hours, which will simplify the policy for customers, as well as provide many cash and ticket payers with an additional benefit over the current transfer policy.* TriMet's current transfer policy for cash fares and single ride tickets is designed to allow a passenger to complete a trip in one direction, and prevent "round-tripping" on the same fare.

Transfers are designed to provide enough time for a person to complete their trip in one direction, by transferring between buses or between bus and rail. On weekdays, most bus service runs at least every half hour, and bus transfers are manually torn to allow at least one hour past the end of the line so that connections can be made with other vehicles. In case a bus is not running as scheduled, this allows enough time to catch the next vehicle. On weekends, transfers are torn for two hours since some service runs only once an hour. The amount of time a customer receives with a bus transfer varies from route to route, and depends on where the customer boards in relation to the end of the line. Tickets purchased for rail, however, are always valid for two hours.

The current transfer policy as applied is confusing and unpredictable for customers, is inconsistent between service modes, and is a highly manual and time consuming procedure for bus operators to implement, and which is often prone to error.

*To facilitate the change in transfer policy, in June 2013, TriMet anticipates implementing transfer printers on buses that will automatically print the expiration time for two hours from the time of purchase.* This will be an improvement that will eliminate the unpredictability in transfer times for customers, provide consistency between bus and rail transfers, and replace the highly manual paper/punch transfer system with an automatic solution that will greatly streamline the bus operator's responsibilities.

## X. Analysis Results – Fare Changes

Results of the analysis of recommended fare changes are summarized in the Table 12 below, with recommended measures to mitigate potential impacts noted. Related mitigation measures are detailed in the preceding Section IX. Analysis-Fare Changes, and Section XI. Mitigations-Fare Change Impacts, following.

**Table 12**  
**Equity Impacts of Fare Changes**

Fare Change Proposal Elements	Minority Disparate Impact	Low-Income Disparate Impact	Mitigation Measures
1. Implement Adult flat fare of \$2.50; eliminate zones: a. Increase cash fares: Adult All-Zone 4.2%, Adult 2-Zone 19%, and Youth 10%	Possible	Possible	Yes
b. Increase pre-paid tickets: All-Zone 4.2%, Adult 1 & 2-Zone 19%-22%, and Youth 10%	Not Likely	Not Likely	Yes
c. Increase multi-ride passes: Adult All-Zone 7.5%-8.7%, Adult 2-Zone 22%-23.8%, and Youth 10.7%-11.1%	Not Likely	Not Likely	Yes
2. Eliminate Free Rail Zone	Not Likely	Not Likely	Yes
3. Introduce new 7-Day pass for Youth and Honored Citizens	Not Likely	Not Likely	
4. Introduce a new Day Pass for Adult, Youth, and Honored Citizens at twice the single trip fare	Not Likely	Not Likely	

## XI. MITIGATIONS – FARE CHANGES

TriMet has initiated a number of fare programs and options to create fare alternatives for minority and low income populations, with a focus on expanding unlimited ride options that offer more flexible and economical payment opportunities. New programs and options will accompany September 2012 fare changes while existing programs will be maintained or enhanced, summarized following.

### Summary of Mitigation Measures

#### Measures for September 2012:

- *For September 2012, TriMet will introduce unlimited ride Day Passes (priced at only twice the single ride cash fare) and 7-Day Passes for Adults, Youth, and Honored Citizens. Day Passes and 7-Day Passes will be new options for both Honored Citizens and Youth. Day Passes will provide Youth and Honored Citizen cash payers with a convenient and economical alternative to paying for each ride separately, with the added benefit of unlimited rides during the day for the price of a roundtrip, a significant financial benefit for customers making multiple trips during the day. Similarly, the 1-Day Pass price for Adults will not increase and will remain at \$5.00, providing unlimited rides throughout the day for only twice the single fare. Providing a 7-Day Pass for each fare category offers another new unlimited ride product, for less than the upfront cost of a monthly pass. Increased marketing efforts are planned to remind people about the financial benefits of unlimited ride passes.*

*The Day Pass and 7-Day Pass options offer additional payment and unlimited ride alternatives, and prospective mitigations for low-income and minority persons. The new Day Pass offers a prospective mitigation for low-income and minority persons currently using single-ride cash fares or tickets. In addition, eliminating fare zones provides a more equitable system for those individuals that live in the suburbs (who have become increasingly more likely to be low-income and minority) and travel great distances, as well as individuals that are penalized for living near a zone boundary. These minority and low-income suburban residents, who are more likely to pay with a single-ride cash fare, will especially benefit from the unlimited ride advantages provided by the new Day Pass and 7-Day Pass format.*

- *For September 2012, TriMet will explore increasing the program discount to social service agencies from 5% to 10%, and will consider expanding program eligibility requirements to ensure that more community-based organizations that focus on providing services to low-income clients will be able to participate. With additional community outreach and education, TriMet hopes to work with organizations that serve homeless and/or low income persons, to help their clients access services critical to personal and residential stability.*
- *To mitigate the impact of recent fare increases for TriMet's LIFT paratransit service, Honored Citizen fares (senior citizens aged 65 and older, person with a disability, or person with a Medicare card) for fixed-route service will not increase at this time. Keeping Honored Citizen fares unchanged will help disabled individuals that are able to use fixed-route service transition to the higher LIFT fares. The Committee on Accessible Transportation (CAT) recommended that the Honored Citizen cash and pass fare not be increased during the transition to higher LIFT fares.*

- To reduce the need for additional fare increases and service cuts that would adversely impact low-income riders throughout the service district, TriMet is recommending the elimination of the Free Rail Zone in downtown Portland. *To mitigate the potential impact of eliminating the Free Rail Zone for the elderly and people with disabilities, TriMet will extend the Honored Citizen Downtown Pass Program (currently for Bus) to include free trips on rail for these individuals.* To be eligible, customers must qualify as a TriMet Honored Citizen (senior citizen aged 65 and older, person with a disability, or person with a Medicare card), and be able to show proof of residence within the boundaries of the free fare area. Maintaining free bus/rail transit service in downtown for seniors and people with disabilities ensures that the most vulnerable citizens, many of whom are transit dependent, will continue to have the same access to transit and much needed services in the downtown area, including access to medical care, shopping and social services.
- *To reduce the need for additional fare increases and service cuts that would adversely impact low-income riders throughout the service district, TriMet has increased administrative cuts from \$500,000 to \$1.2 million.*
- TriMet's initial budget proposal considered limiting single trip tickets to travel in one direction only. Under that proposal, all tickets and transfers would be valid within the expiration time to make a trip in one direction, and a return trip ("round-trip") would not be allowed on the same fare. However, the initial proposal was based on a potential budget shortfall of \$17 million in the next fiscal year. *Due to the timing of labor negotiations, and because public feedback indicated the change to one-way tickets was the least attractive option of fare changes initially proposed, restricting single trip fares to travel in one direction has not been included in the recommended changes for 2012.*
- In 2011, TriMet created a 30-Day Pass, using an in-house developed ticket printing application at TriMet's main Ticket Office. A 30-Day Pass is a benefit over the current calendar month pass format for customers who do not receive Government-issued benefit checks until the 3<sup>rd</sup> or 5<sup>th</sup> of the month. A 30-Day Pass is also a convenience for customers who desire the flexibility of not being locked into a calendar month format. *In September 2012, 30-Day Passes will also be available at ticket vending machines on all rail platforms.*

**Measure for June 2013:**

- *As of June, 2013 bus transfers will be valid for two hours from the time issued. This is the current policy for MAX transfers. Extending transfer times on buses to two hours will provide an additional benefit to many riders who pay with cash and tickets. New ticket printers will be installed on all buses to facilitate this change.*

**Mitigations Measures Already In Place:**

- In September 2008, TriMet created a 14-Day Pass, designed for low income customers who might be unable to afford the up-front cost of a monthly pass, but would still like to realize the savings of unlimited rides.
- In January 2006, TriMet created a 7-Day Pass, another product designed for low income customers who might be unable to afford the up-front cost of a monthly pass.

## XII. Public Process

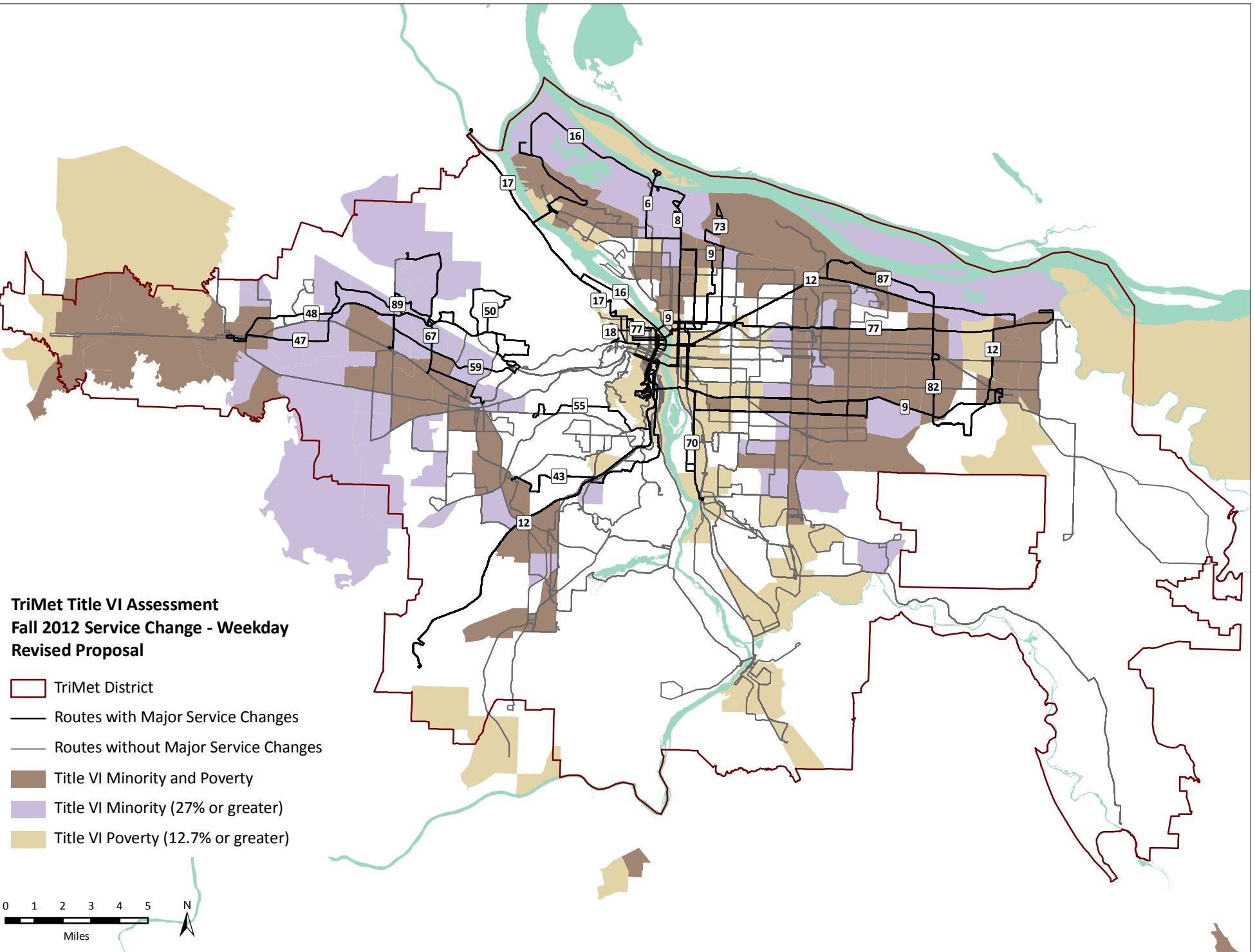
TriMet launched the FY 2013 budget process in late October, three months ahead of schedule, to have additional time to develop options to deal with the budget shortfall, to present, discuss and refine options with the community, and receive community feedback.

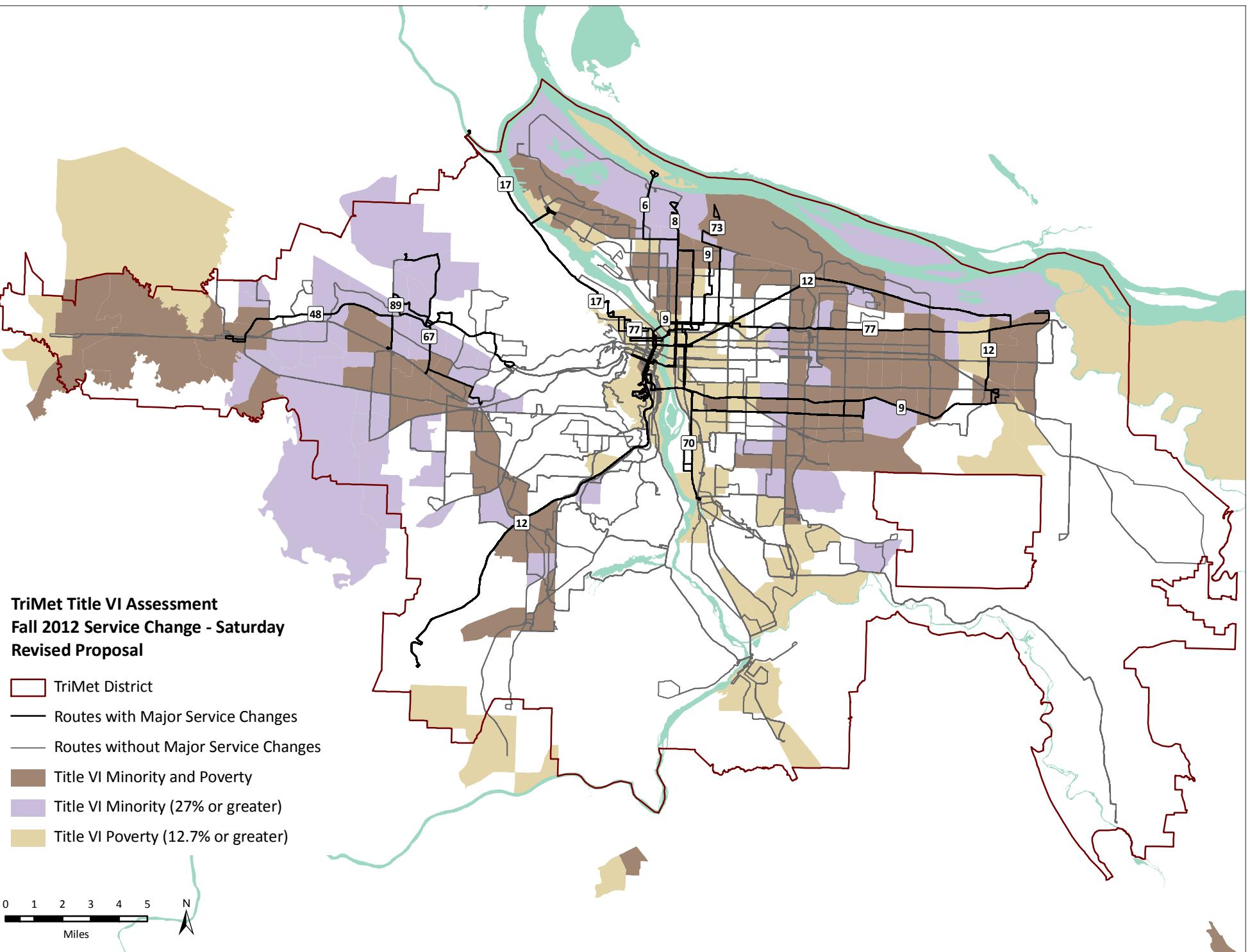
During the six-month outreach process, staff met with more than 5,100 people at dozens of community meetings and other venues, including riding potentially affected bus lines to inform passengers and solicit feedback. In all, the agency received some 16,000 comments on service reduction and fare increase proposals.

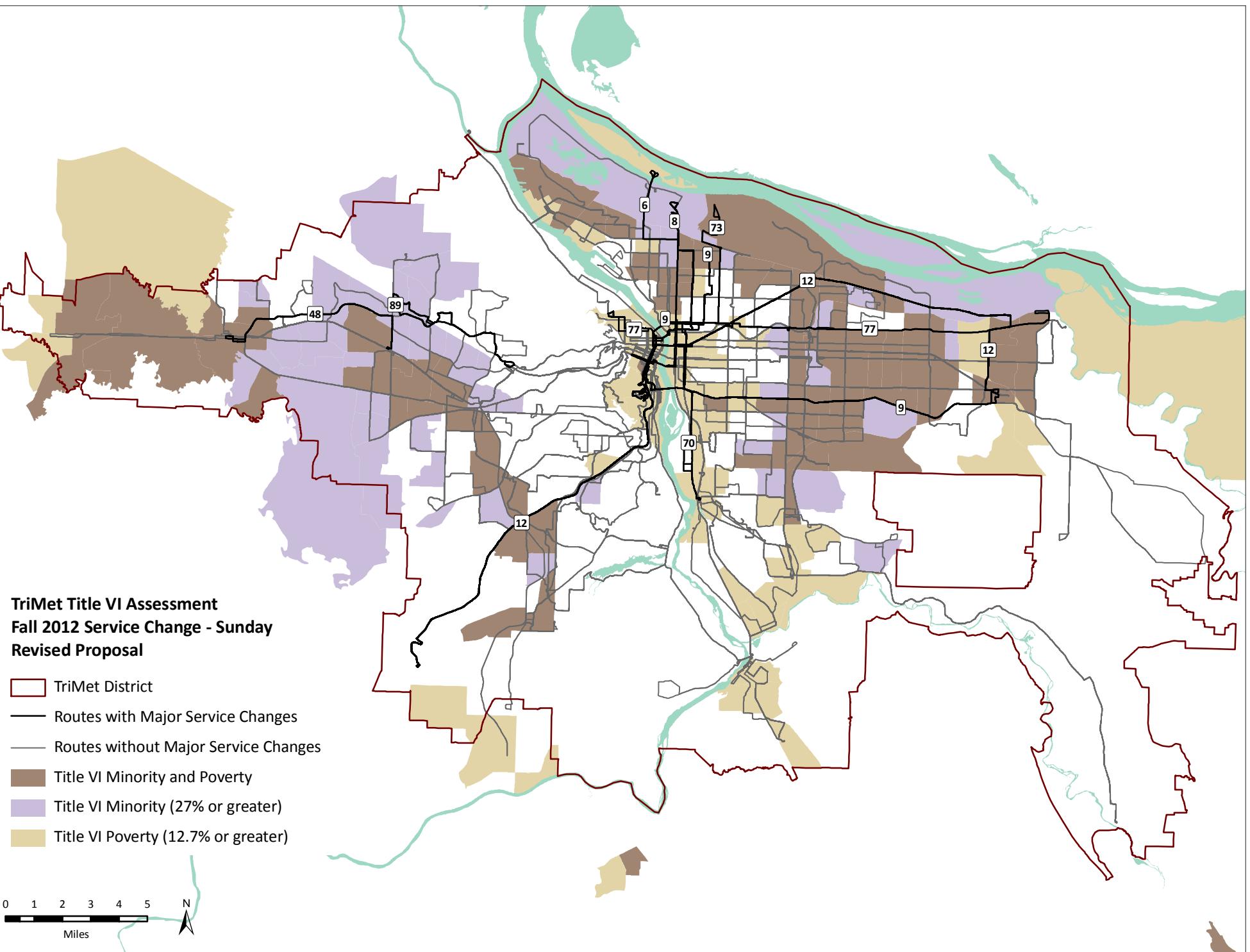
An overview of major steps and milestone dates in the process follows:

- A. October 26, 2011 Kick-off; formation of the General Manager's Budget Task Force.
- B. December 15, 2011 Begin public discussion and input; "*Challenges and Choices - a Budget Discussion Guide.*" Information online and distributed through multiple channels including onboard outreach with input received online and by phone, email, mail, fax and TTY.
- C. February 8, 2012 *Initial Proposal* for service reductions and fare changes reflecting the recommendations of the Budget Task Force and public feedback in response to "Challenges and Choices." Community meetings, four (4) open houses, onboard outreach, and comments are received as in B., above.
- D. March 2, 2012 *Refined Proposal* based on updated financial forecast and public input on the initial proposal. Five (5) public hearings and comments are received as in B., above.
- E. April 25, 2012 *Recommended Plan* to the TriMet Board of Directors considering all public input on the refined proposal. Board's first consideration on April 25.
- F. May 23, 2012 *Final Plan* for fares and services; Board action to adopt a final plan is expected on May 23, 2012. Fare changes effective September 1 and service changes effective September 2, 2012.

## **APPENDIX A: SERVICE AREA MAPS (3)**







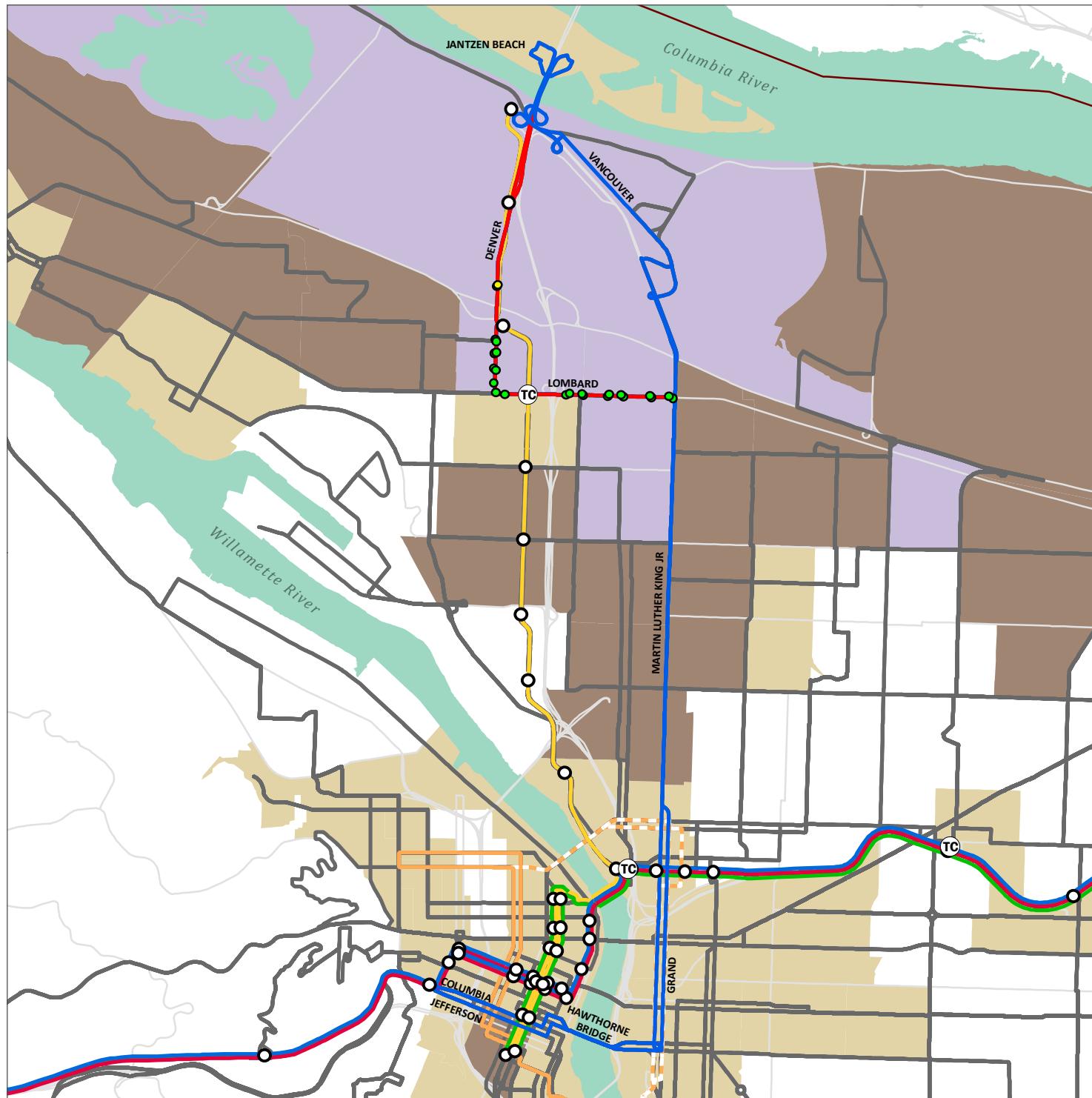
## **APPENDIX B: MAPS OF ROUTES WITH ROUTE CHANGES (16 Lines)**

**TriMet Title VI Assessment**  
**Fall 2012 Service Change**

**6-Martin Luther King Jr Blvd**

- Proposed Line 6
- Discontinued Segment
- Alternative Stop Walking Distance
  - Less than 1/4 Mile
  - Between 1/4 and 1/2 Mile
  - Greater than 1/2 Mile
- MAX Light Rail
- Portland Streetcar
- Portland Streetcar, UC
- Rail Station
- Other Bus Lines
- (TC) Transit Center
- TriMet District
- Title VI Minority and Poverty
- Title VI Minority (27% or Greater)
- Title VI Poverty (12.7% or Greater)

Data: TriMet, Metro, US Census Bureau

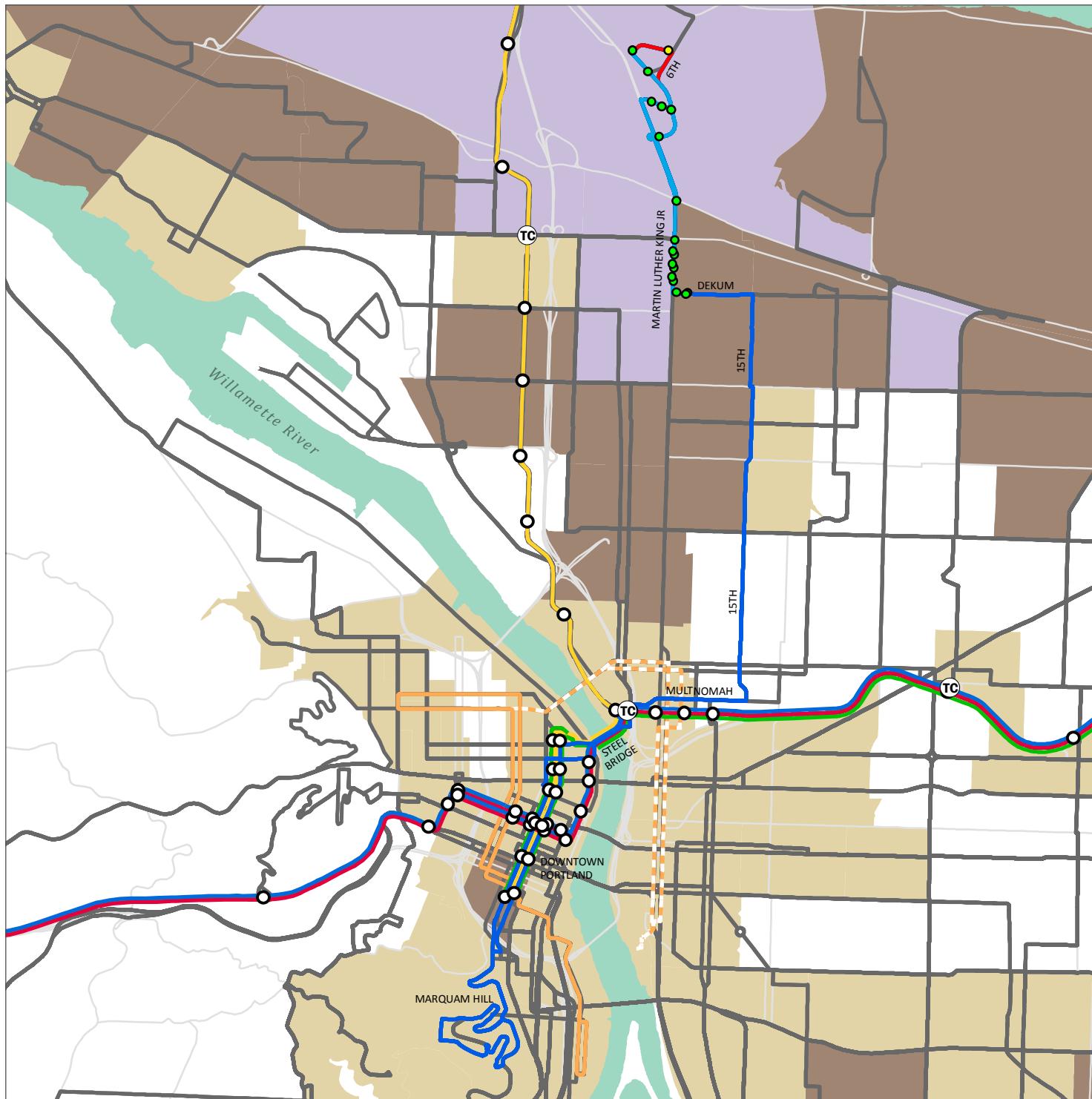


**TriMet Title VI Assessment**  
**Fall 2012 Service Change**

**8-Jackson Park/NE 15th**

- Proposed Line 8
  - Discontinued Segment
  - Segment Joining Line 6
- Alternative Stop Walking Distance
- Less than 1/4 Mile
  - Between 1/4 and 1/2 Mile
  - Greater than 1/2 Mile
- MAX Light Rail
  - Portland Streetcar
  - Portland Streetcar, UC
  - Rail Station
  - Other Bus Lines
  - (TC) Transit Center
  - TriMet District
  - Title VI Minority and Poverty
  - Title VI Minority (27% or Greater)
  - Title VI Poverty (12.7% or Greater)

Data: TriMet, Metro, US Census Bureau



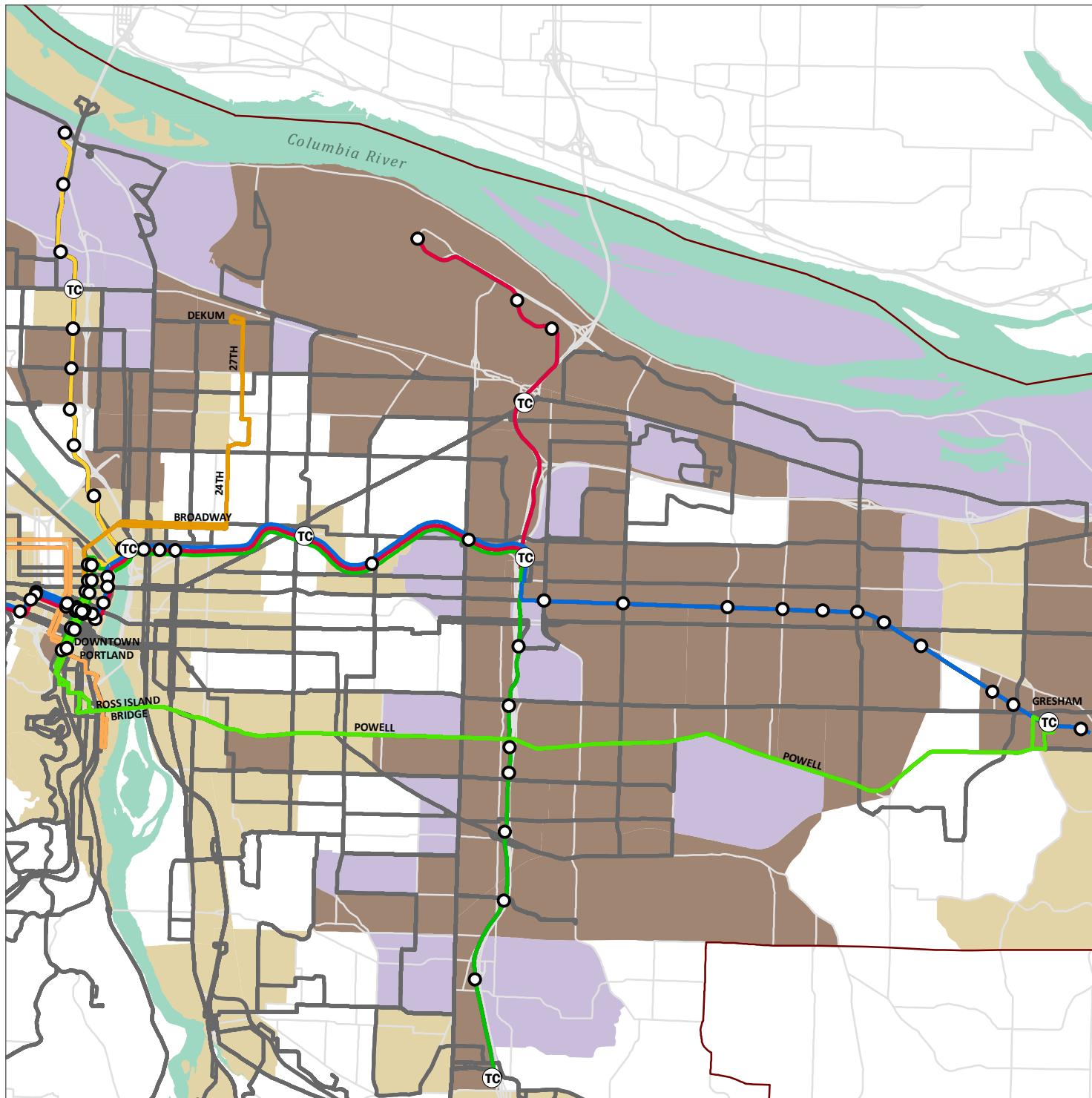
TriMet Title VI Assessment  
Fall 2012 Service Change

9-Powell/Broadway

Proposed Line 9

- South Segment
- North Segment (To be joined with Line 17)
- MAX Light Rail
- Portland Streetcar
- Portland Streetcar, UC
- Rail Station
- Other Bus Lines
- Transit Center (TC)
- TriMet District
- Title VI Minority and Poverty
- Title VI Minority (27% or Greater)
- Title VI Poverty (12.7% or Greater)

Data: TriMet, Metro, US Census Bureau

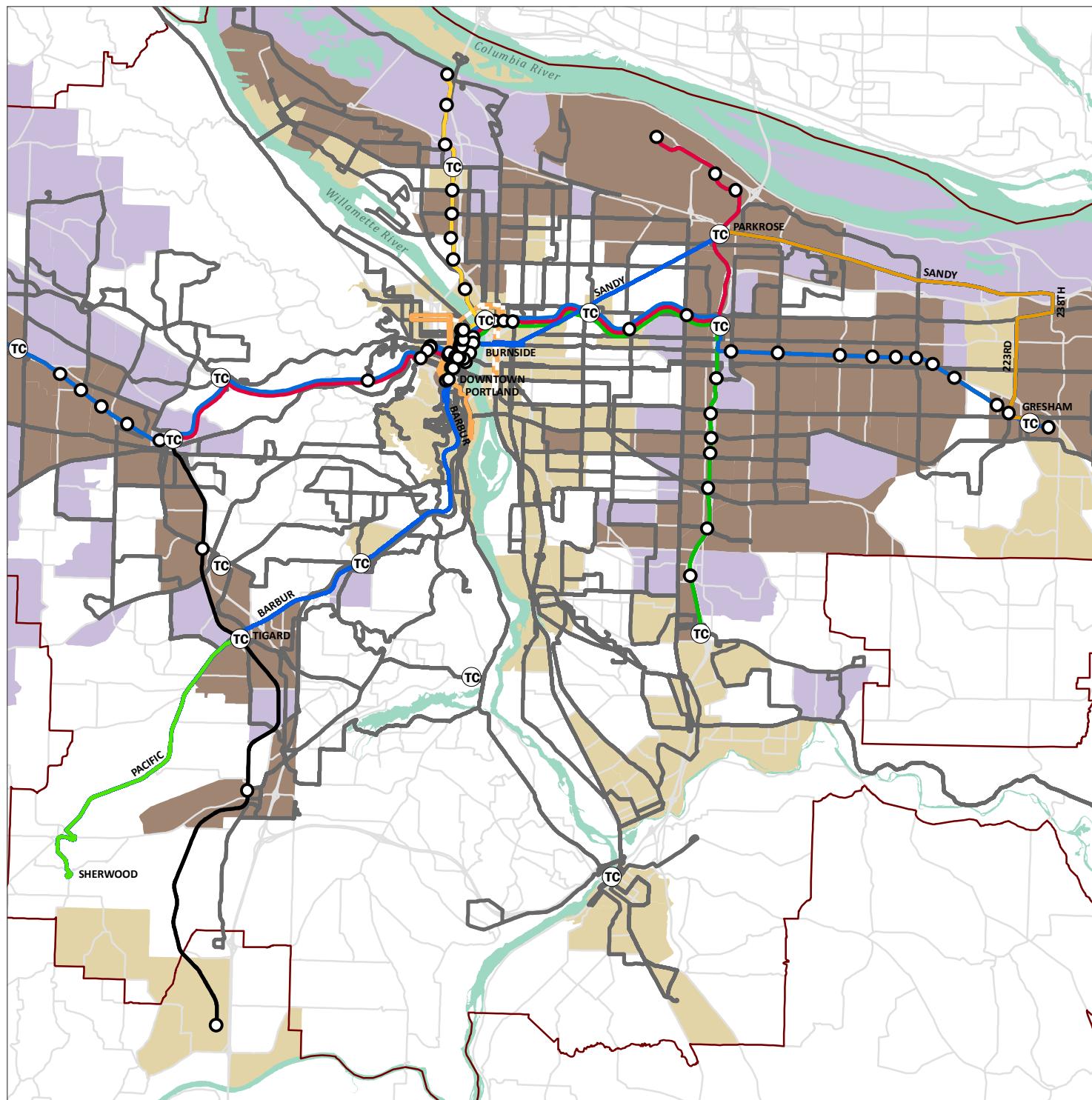


TriMet Title VI Assessment  
Fall 2012 Service Change

12-Barbur/Sandy Blvd

- Proposed Line 12
- Proposed Line 12 East
- Proposed Line 12 South
- MAX Light Rail
- Portland Streetcar
- Portland Streetcar, UC
- Rail Station
- Other Bus Lines
- (TC) Transit Center
- TriMet District
- Title VI Minority and Poverty
- Title VI Minority (27% or Greater)
- Title VI Poverty (12.7% or Greater)

Data: TriMet, Metro, US Census Bureau

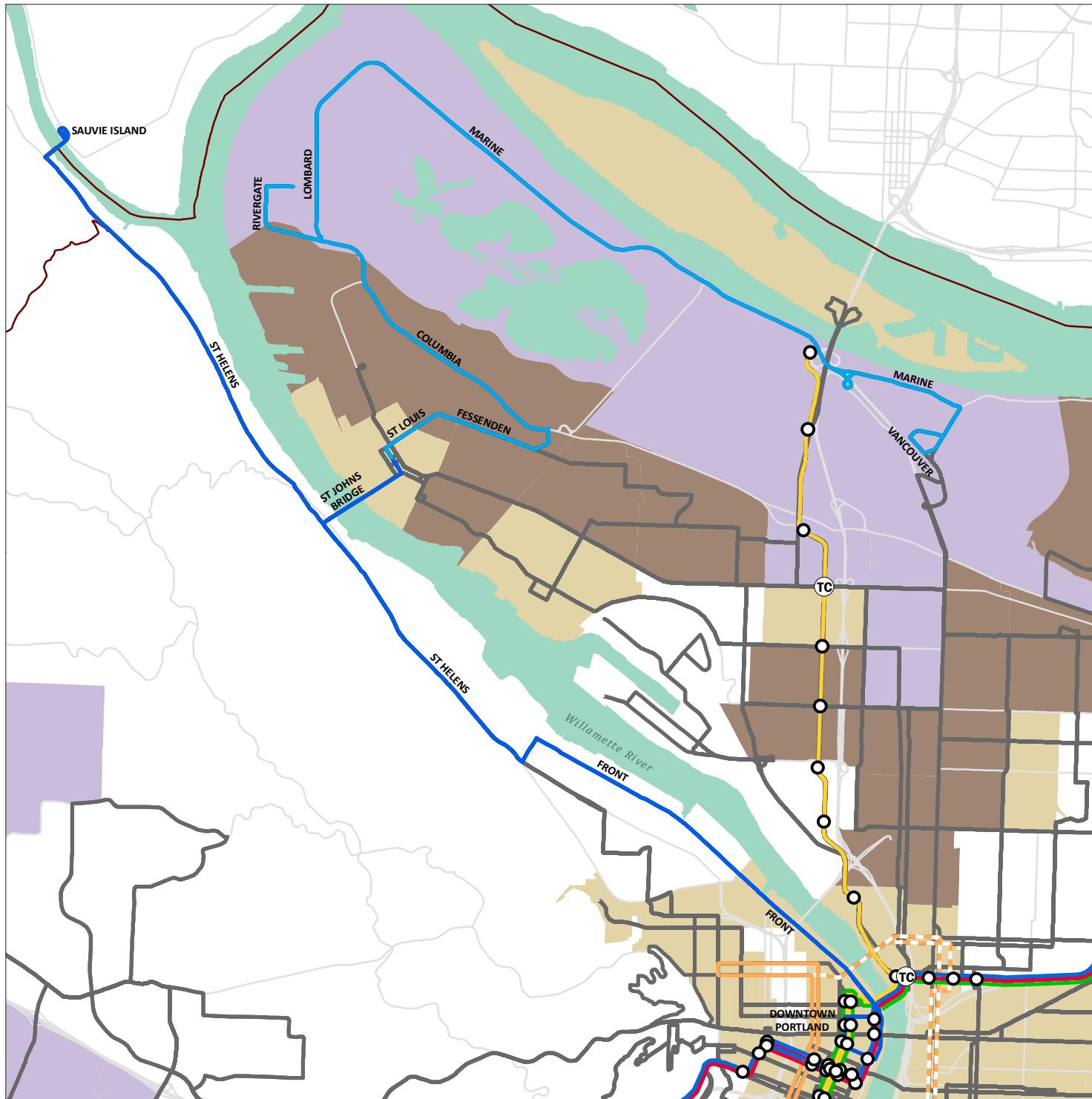


**TriMet Title VI Assessment**  
**Fall 2012 Service Change**

**16-Front Ave/St Johns**

- Proposed Line 16
- New Marine Dr Service
- MAX Light Rail
- Portland Streetcar
- Portland Streetcar, UC
- Rail Station
- Other Bus Lines
- (TC) Transit Center
- TriMet District
- Title VI Minority and Poverty
- Title VI Minority (27% or Greater)
- Title VI Poverty (12.7% or Greater)

Data: TriMet, Metro, US Census Bureau



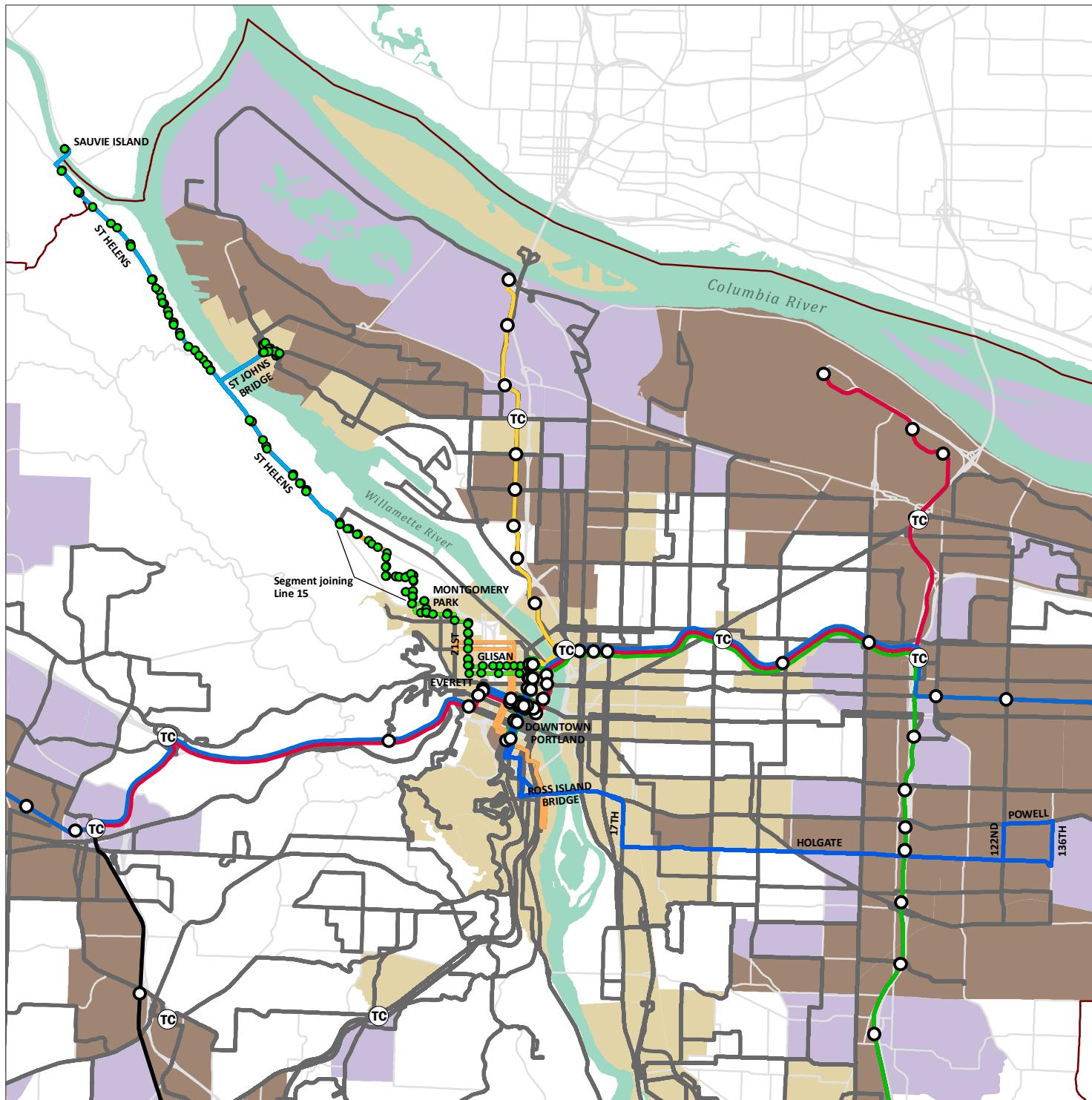
## TriMet Title VI Assessment

Fall 2012 Service Change

### 17-Holgate/NW 21st

- Proposed Line 17
  - See Line 9 map for proposed extension
  - Segment Joining Line 16
  - Segment Joining Line 77
  - Segment Joining Line 15
- Alternative Stop Walking Distance
- Less than 1/4 Mile
  - Between 1/4 and 1/2 Mile
  - Greater than 1/2 Mile
- MAX Light Rail
  - Portland Streetcar
  - Portland Streetcar, UC
  - Rail Station
  - Other Bus Lines
  - TC Transit Center
  - TriMet District
  - Title VI Minority and Poverty
  - Title VI Minority (27% or Greater)
  - Title VI Poverty (12.7% or Greater)

Data: TriMet, Metro, US Census Bureau

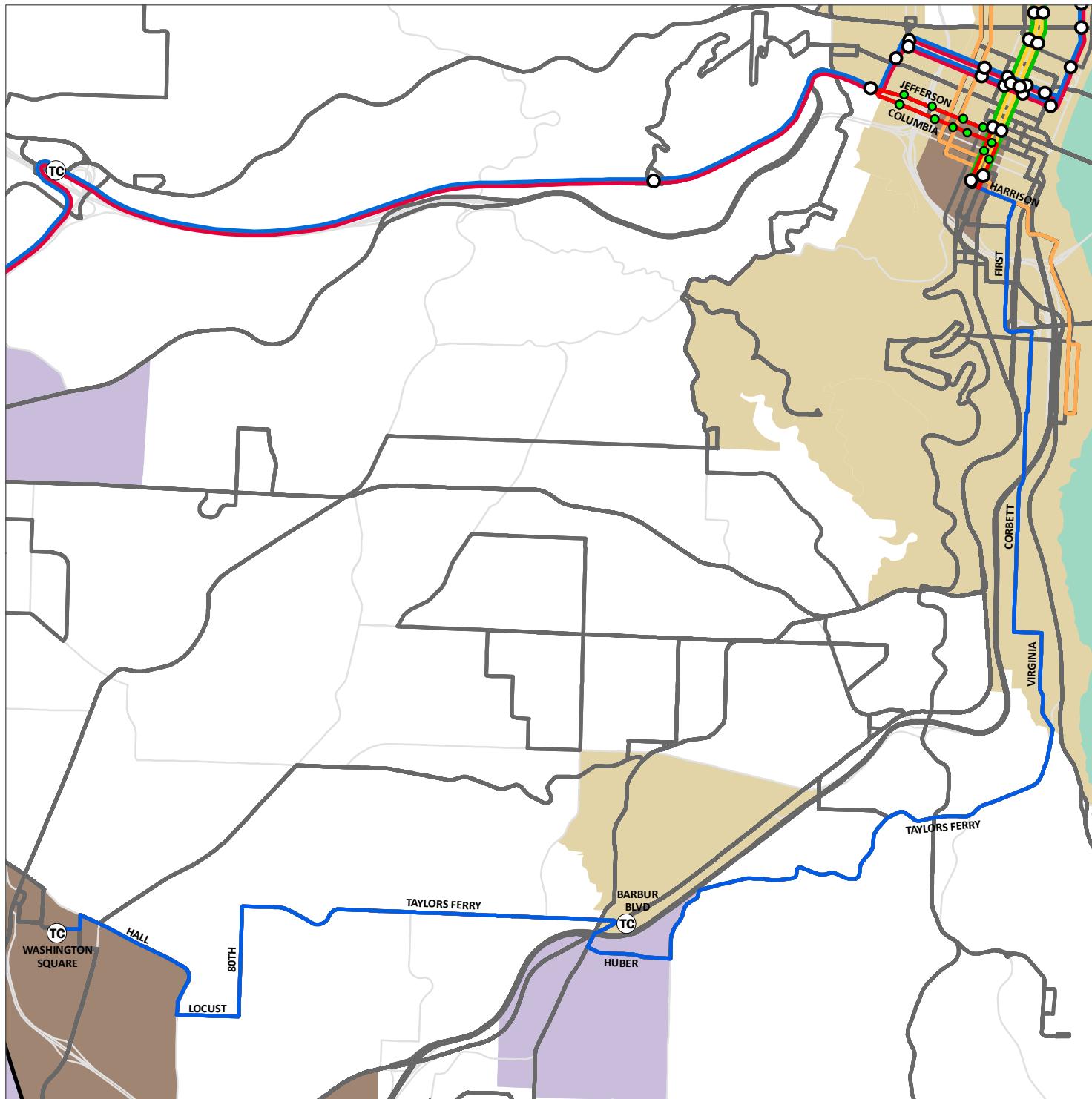


TriMet Title VI Assessment  
Fall 2012 Service Change

43-Taylors Ferry Rd

- Proposed Line 43
- Discontinue segment
- Alternative Stop Walking Distance
  - Less than 1/4 Mile
  - Between 1/4 and 1/2 Mile
  - Greater than 1/2 Mile
- MAX Light Rail
- Portland Streetcar
- Portland Streetcar, UC
- Rail Station
- Other Bus Lines
- TC Transit Center
- TriMet District
- Title VI Minority and Poverty
- Title VI Minority (27% or Greater)
- Title VI Poverty (12.7% or Greater)

Data: TriMet, Metro, US Census Bureau

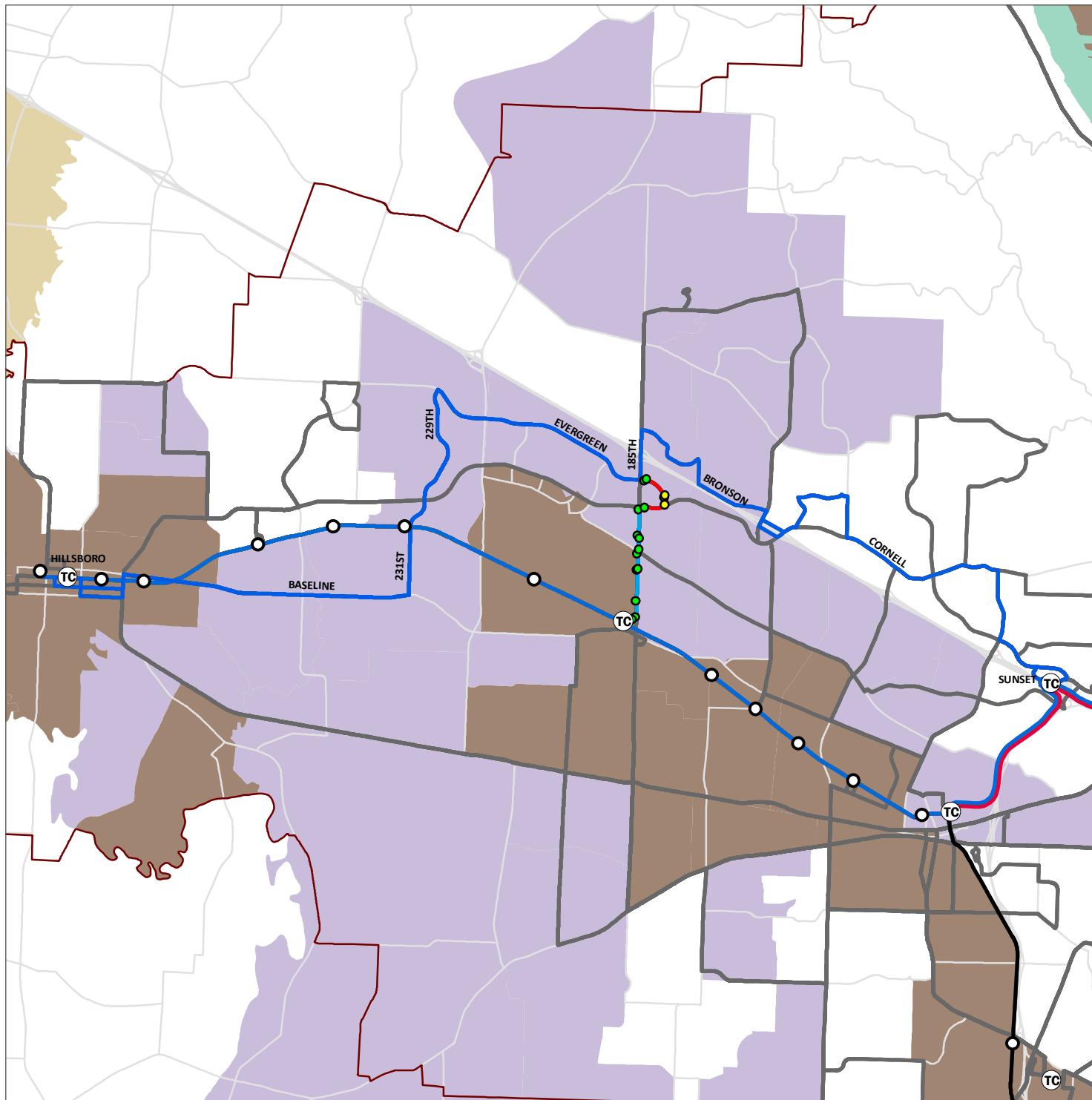


**TriMet Title VI Assessment**  
**Fall 2012 Service Change**

**47-Baseline/Evergreen**

- Proposed Line 47
- Discontinued Segment
- Discontinue Line 47,
- Other Service Available
- Alternative Stop Walking Distance
  - Less than 1/4 Mile
  - Between 1/4 and 1/2 Mile
  - Greater than 1/2 Mile
- MAX Light Rail
- Portland Streetcar
- Portland Streetcar, UC
- Rail Station
- Other Bus Lines
- (TC) Transit Center
- TriMet District
- Title VI Minority and Poverty
- Title VI Minority (27% or Greater)
- Title VI Poverty (12.7% or Greater)

Data: TriMet, Metro, US Census Bureau

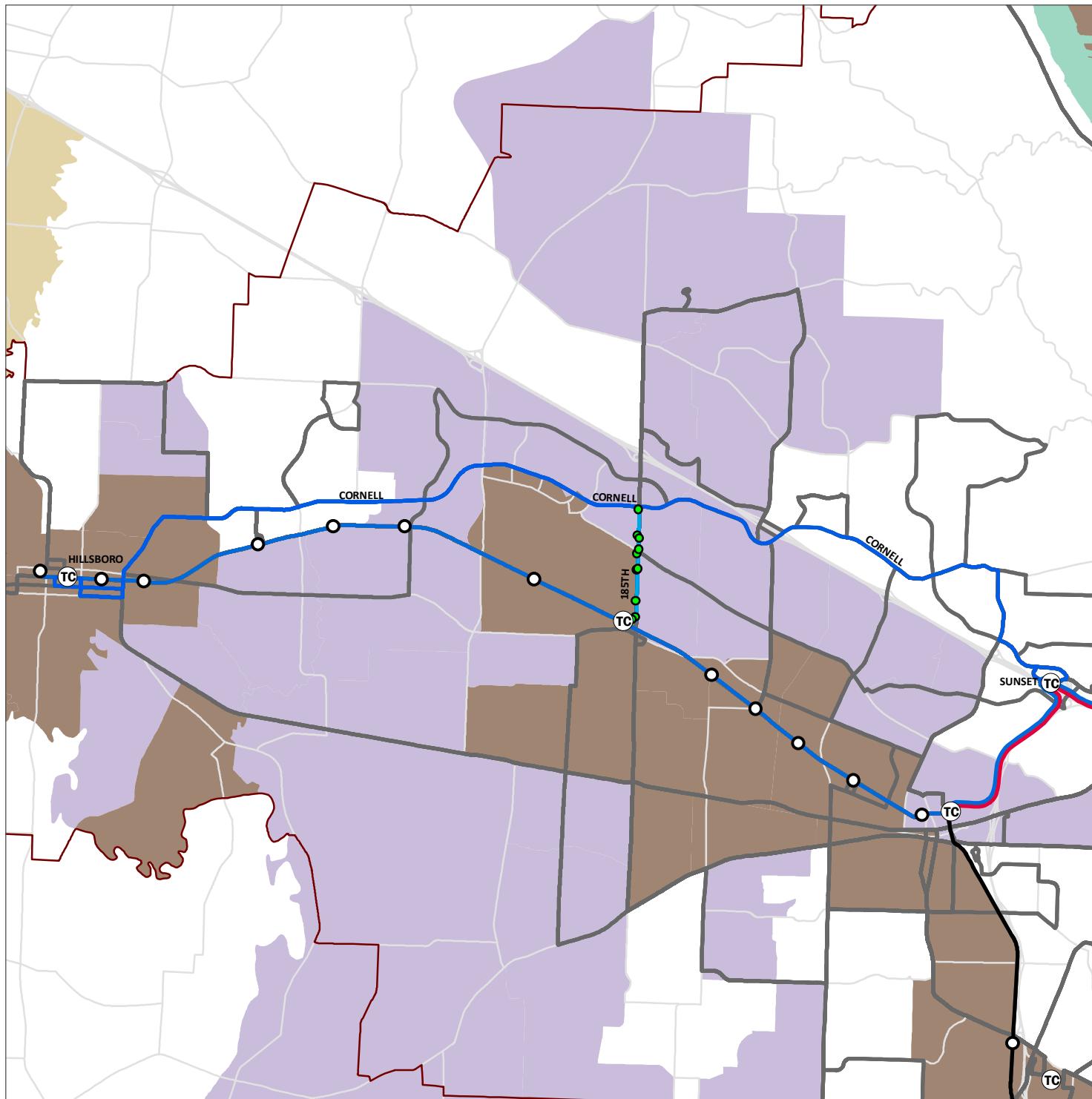


**TriMet Title VI Assessment**  
**Fall 2012 Service Change**

**48-Cornell**

- Proposed Line 48
- Discontinue Line 48,  
Other Service Available
- Alternative Stop Walking Distance
  - Less than 1/4 Mile
  - Between 1/4 and 1/2 Mile
  - Greater than 1/2 Mile
- MAX Light Rail
- Portland Streetcar
- Portland Streetcar, UC
- Rail Station
- Other Bus Lines
- (TC) Transit Center
- TriMet District
- Title VI Minority and Poverty
- Title VI Minority (27% or Greater)
- Title VI Poverty (12.7% or Greater)

Data: TriMet, Metro, US Census Bureau

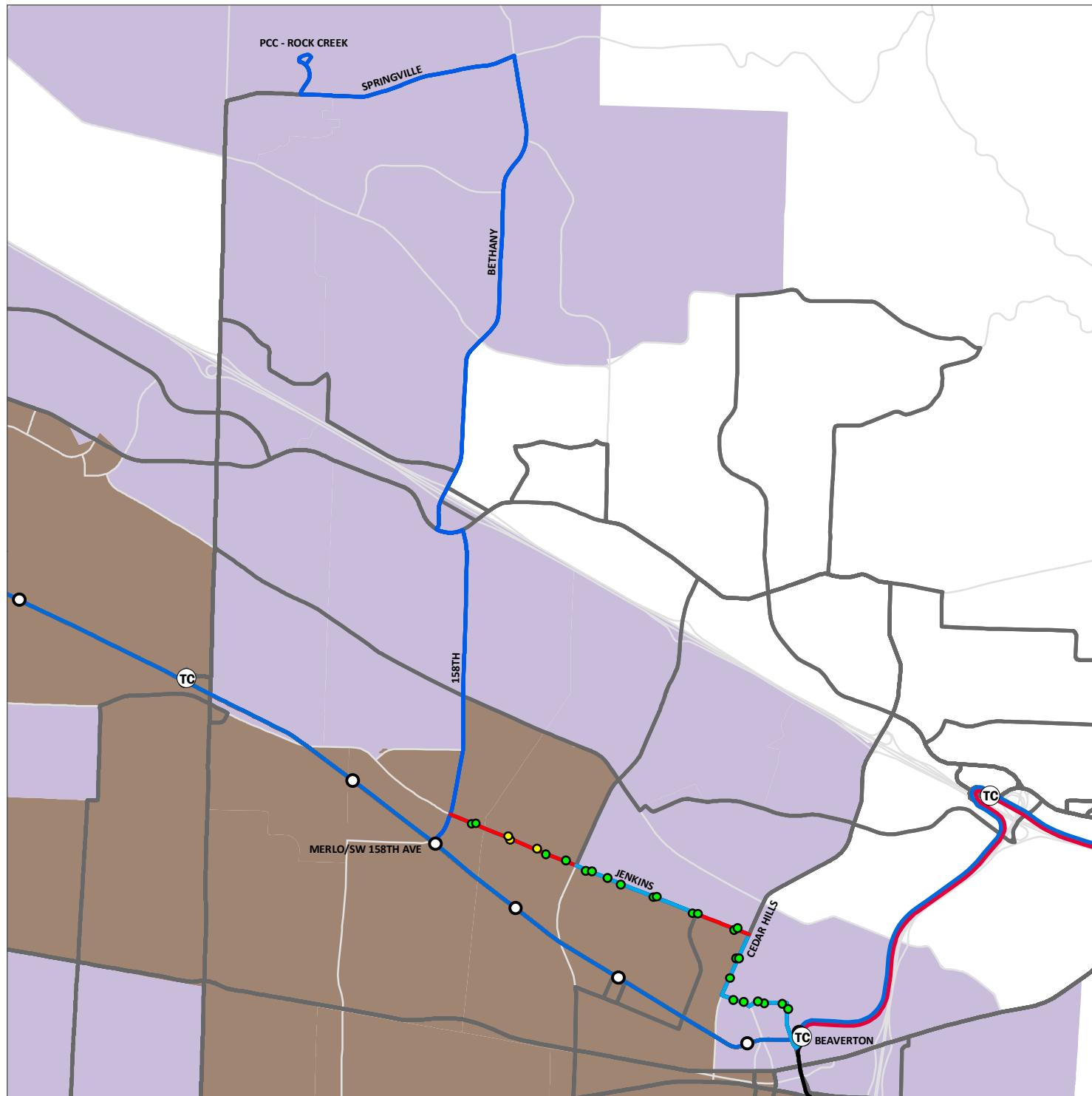


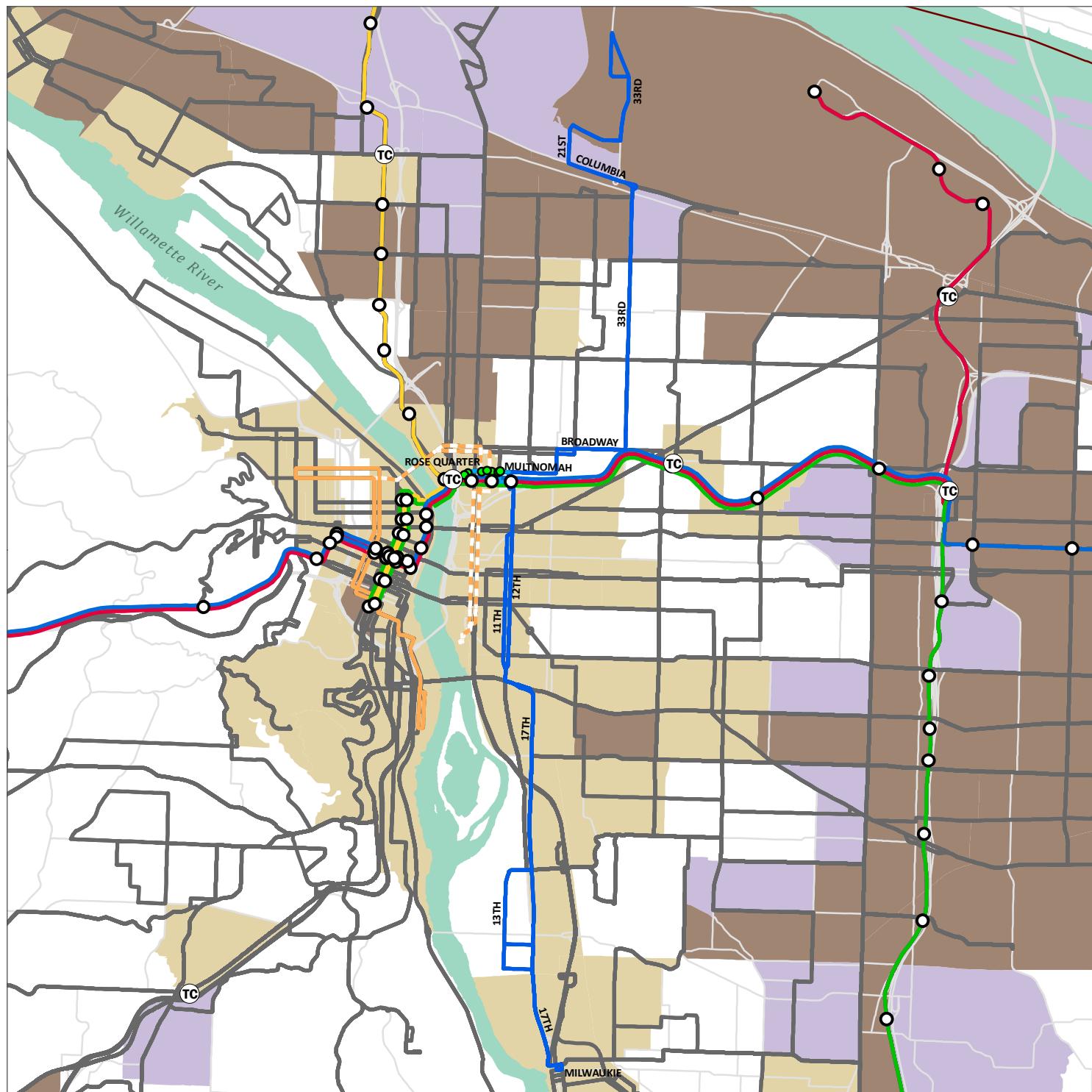
**TriMet Title VI Assessment**  
**Fall 2012 Service Change**

**67-Jenkins/158th**

- Proposed Line 67
  - Discontinue Segment
  - Discontinue Line 67,
  - Other Service Available
- Alternative Stop Walking Distance
- Less than 1/4 Mile
  - Between 1/4 and 1/2 Mile
  - Greater than 1/2 Mile
- MAX Light Rail
  - Portland Streetcar
  - Portland Streetcar, UC
  - Rail Station
  - Other Bus Lines
  - TC Transit Center
  - TriMet District
  - Title VI Minority and Poverty
  - Title VI Minority (27% or Greater)
  - Title VI Poverty (12.7% or Greater)

Data: TriMet, Metro, US Census Bureau





TriMet Title VI Assessment  
Fall 2012 Service Change

**70-12th Ave & 73-NE 33rd Ave**

- Proposed Line 70
  - Discontinue Line 70 & 73,
  - Other Service Available

Alternative Stop Walking Distance

  - Less than 1/4 Mile
  - Between 1/4 and 1/2 Mile
  - Greater than 1/2 Mile

MAX Light Rail

Portland Streetcar

Portland Streetcar, UC

Rail Station

Other Bus Lines

Transit Center

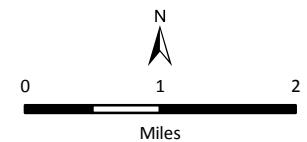
TriMet District

Title VI Minority and Poverty

Title VI Minority (27% or Greater)

Title VI Poverty (12.7% or Greater)

Data: TriMet, Metro, US Census Bureau

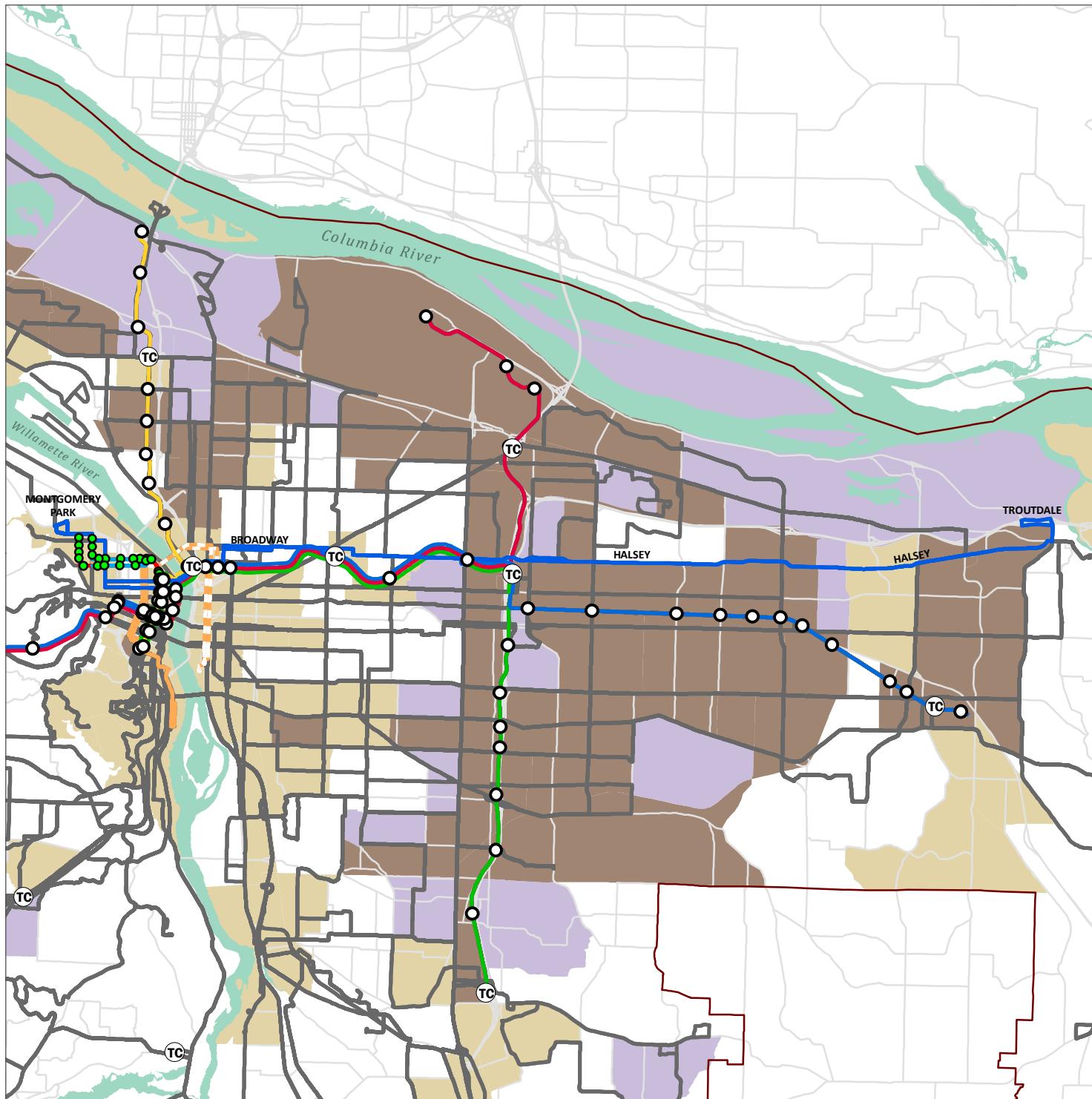


**TriMet Title VI Assessment**  
**Fall 2012 Service Change**

**77-Broadway/Halsey**

- Proposed Line 77
- Discontinued Segment
- Discontinue Line 77,
- Other Service Available
- Alternative Stop Walking Distance
  - Less than 1/4 Mile
  - Between 1/4 and 1/2 Mile
  - Greater than 1/2 Mile
- MAX Light Rail
- Portland Streetcar
- Portland Streetcar, UC
- Rail Station
- Other Bus Lines
- TC Transit Center
- TriMet District
- Title VI Minority and Poverty
- Title VI Minority (27% or Greater)
- Title VI Poverty (12.7% or Greater)

Data: TriMet, Metro, US Census Bureau

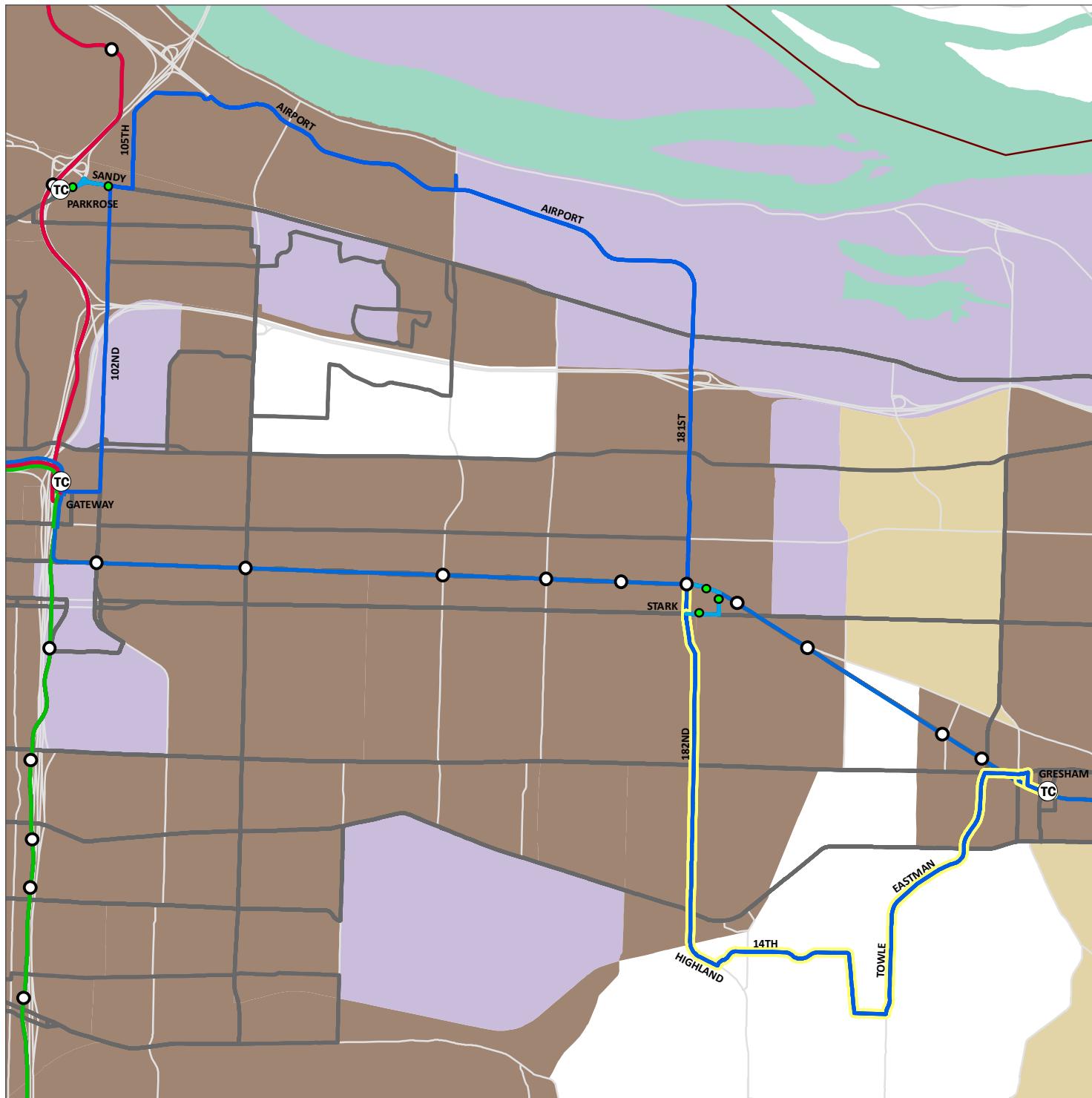


**TriMet Title VI Assessment**  
**Fall 2012 Service Change**

**87-Airport Way/181st &  
 82-Eastman/182nd**

- Proposed Line 87
  - Incorporating Line 82
  - Discontinue Line 87,
  - Other Service Available
- Alternative Stop Walking Distance
- Less than 1/4 Mile
  - Between 1/4 and 1/2 Mile
  - Greater than 1/2 Mile
- MAX Light Rail
  - Portland Streetcar
  - Portland Streetcar, UC
  - Rail Station
  - Other Bus Lines
  - TC Transit Center
  - TriMet District
  - Title VI Minority and Poverty
  - Title VI Minority (27% or Greater)
  - Title VI Poverty (12.7% or Greater)

Data: TriMet, Metro, US Census Bureau

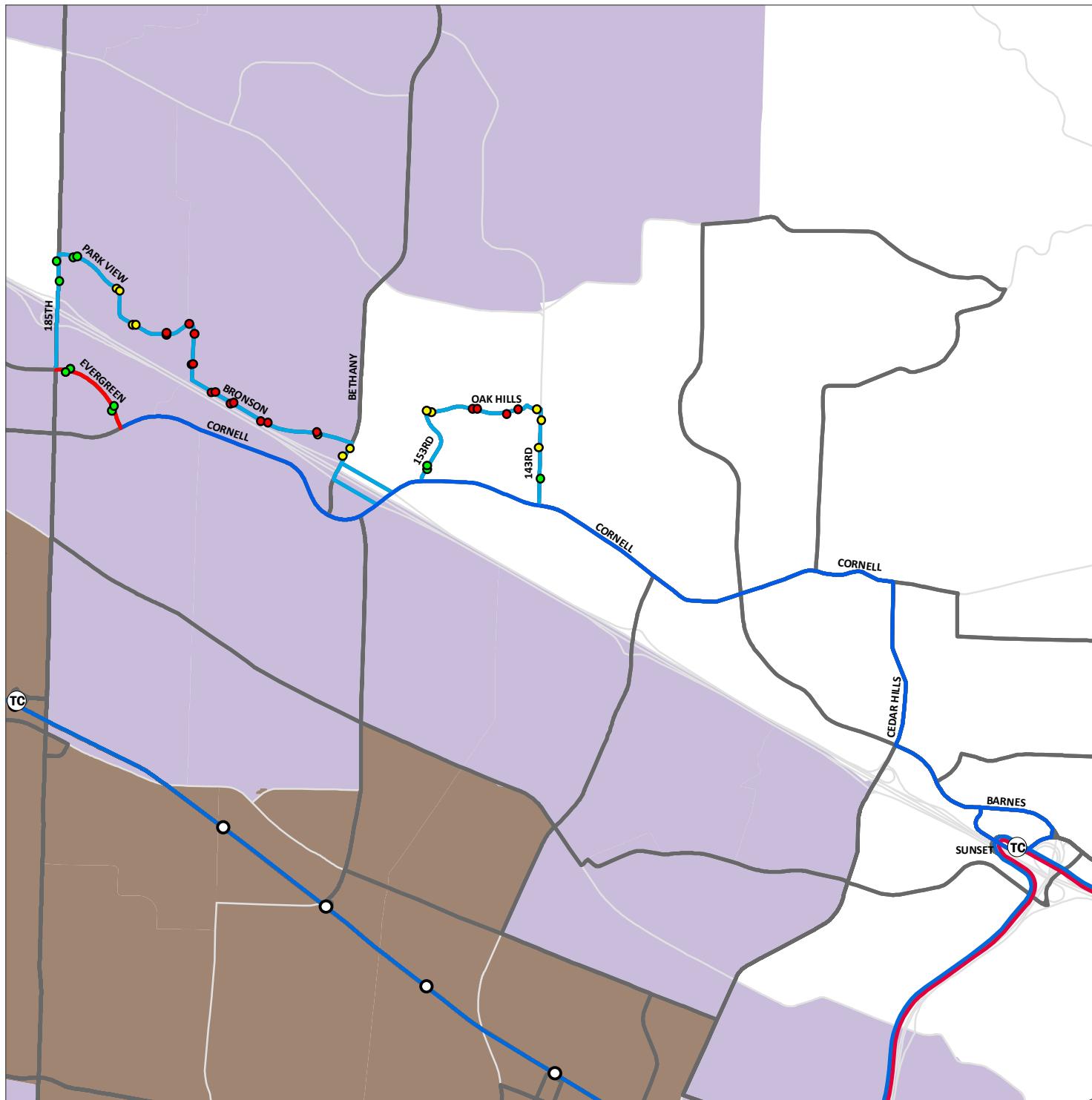


**TriMet Title VI Assessment**  
**Fall 2012 Service Change**

**89-Tanasbourne**

- Line 89 Replaced by Line 48
- All Days of the Week
- Line 89 Replaced by Line 47
- Weekdays Only
- Discontinue Segment
- Alternative Stop Walking Distance
  - Less than 1/4 Mile
  - Between 1/4 and 1/2 Mile
  - Greater than 1/2 Mile
- MAX Light Rail
- Portland Streetcar
- Portland Streetcar, UC
- Rail Station
- Other Bus Lines
- Transit Center
- TriMet District
- Title VI Minority and Poverty
- Title VI Minority (27% or Greater)
- Title VI Poverty (12.7% or Greater)

Data: TriMet, Metro, US Census Bureau



ATTACHMENT K: TRIMET TITLE VI TRANSIT EQUITY IMPACTS ASSESSMENT —  
RECOMMENDED SERVICE CHANGES LINE 47-BASELINE/EVERGREEN AND 48-CORNELL

**TriMet Title VI and Transit Equity Impacts Assessment**

**Recommended Service Changes  
Line 47-Baseline/Evergreen and 48-Cornell**

**Final Report**

**May 16, 2013**

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## **EXECUTIVE SUMMARY**

This report evaluates Title VI and transit equity impacts of recommended service changes on Line 47-Baseline/Evergreen and Line 48-Cornell in compliance with the Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B. The report identifies the presence and magnitude of adverse effects and tests for disparate impacts (minority) and disproportionate burdens (low-income) by comparing the percentages of minority and low-income populations, respectively, for all impacted census tracts to averages for the TriMet service district.

Under TriMet's policies and definitions, changes on each line would be considered a major service change, thus an equity assessment is completed prior to final action on recommended changes.

### **Line 47-Baseline/Evergreen**

A routing change for Line 47-Baseline/Evergreen would impact service at 68 bus stops, including 22 stops in minority tracts. The minority population of all impacted tracts is 20.6 percent, less than the TriMet district average (27.1%). There is an adverse effect on service; however this would not be a disparate impact.

No impacted stops are located in census tracts where poverty population is higher than the TriMet district average (21.9%).

Among all impacted stops there is a high level of alternative service availability, with 92.5 percent of rider ons and offs either directly served by one or more other lines or within one-quarter mile or less. Among bus stops in minority tracts, 58.2 percent of impacted ridership would have a high level of alternative service (46 of 79 daily ons and offs). Added service on Line 48-Cornell further strengthens available alternative service by maintaining am/pm peak frequency at stops presently served by both Lines 47 and 48 along Cornell Rd.

Service frequency on Line 47 will be improved, and more frequent service will benefit all trips within the portions of the route illustrated in this analysis, and will benefit midday and evening trips anywhere on the route. The times of the first trips of the day will be similar to the present, and service will be extended one hour later in the evening for trips to the Hillsboro Transit Center.

Onboard surveys were also administered across all trips in the daily schedule along the impacted section of Line 47 to generate feedback from the community and assess the impact of the potential route change on riders' daily trips. Survey results are provided as an Appendix.

A majority of responding riders said they would continue using TriMet service even with changes to Line 47. Predominantly, these riders said they would use Line 48 to complete their trip. About 10 percent of those surveyed said that they would be without a transportation alternative; these responses generally align with results of the stop-by-stop analysis of alternative service availability.

*Findings:*

No Title VI impacts on minority population disproportionate to representation within TriMet's service area were found based on this analysis. Likewise, no disproportionate burden impacts on low-income populations were found.

Adverse effects for impacted riders are highly mitigated by availability of alternative service. Some 93 percent of rider ons and offs either directly served by another line or within ¼ mile or less.

**Line 48-Cornell**

Recommended changes would be an improvement in weekday service on Line 48. The Line would continue to run from Hillsboro Transit Center to Sunset Transit Center on its present routing. There would be four additional trips daily in each direction along the entire line (from 52 to 60 trips per day). In addition, there will be new trips in the a.m. and p.m. peaks and evening in both directions between the Sunset Transit Center and NW Cornell Rd. at NW Stucki Ave. (21 trips per day). These additional trips will improve frequency in the Stucki Ave. to Hillsboro TC segment (from 30-38 minute headways to 15-17 minute headways) during peak commuting hours and reduce evening headways on the entire Line to 45 minutes or less from 55-60 minutes.

The first morning trips from Hillsboro Transit Center and Sunset Transit Center would continue run at 5:10am and 5:23am, respectively. However, the last trip from Hillsboro Transit Center would be at 9:11pm instead of 8:19pm. The last trip from Sunset Transit Center would be at 10:38pm instead of 9:54pm.

Line 48 riders would benefit from improved frequency and span of service on weekdays. Average daily ridership on Line 48 in Fall 2012 was 970 boardings.

*Findings:*

No adverse effects and no Title VI impacts on minority population disproportionate to representation within TriMet's service area were found based on this analysis. Likewise, no disproportionate burden impacts on low-income populations were found.

## TITLE VI AND TRANSIT EQUITY ANALYSIS

TriMet complies with Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B to ensure that:

- The level and quality of service is provided without regard to race, color or national origin;
- There is full and fair participation in decision making without regard to race, color or national origin, and;
- There is meaningful access to programs by persons with limited English proficiency.

### *Definition of Minority and Low-Income Populations*

From FTA Circular 4702.1B

"Minority Persons include the following

- (1) American Indian and Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment
- (2) Asian, which refers to people having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent.
- (3) Black or African American Populations, which refers to peoples having origins in any of the Black racial groups of Africa.
- (4) Hispanic or Latino Populations, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.
- (5) Native Hawaiian and Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands."

For the purposes of this analysis, "low-income" is defined as a person whose median household income is at or below 150% of the federal poverty guidelines as determined by the most recent U.S Census American Community Survey 5-year estimates

## TRIMET SYSTEM RIDERSHIP PROFILE

### *Daily Ridership*

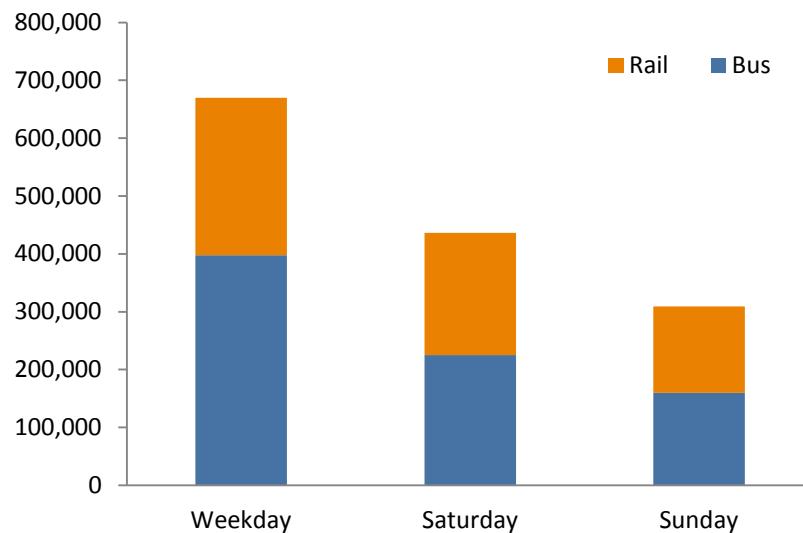
The following data plotted in Figure 1 below illustrate the distribution of ridership between TriMet's bus and rail systems on weekdays, Saturday, and Sunday. Ridership data is collected on an on-going basis via Automatic Passenger Counters (APCs) on TriMet vehicles and summarized quarterly. The data in Table 1 is from the Fall 2012 summary period.

**Table 1. Ridership by Mode and Day**

Service Day	Bus	Rail*	Total
Weekday	397,778	272,076	669,854
Saturday	225,140	211,109	436,249
Sunday	160,001	149,377	309,378

\*Rail includes both MAX light rail and WES commuter rail

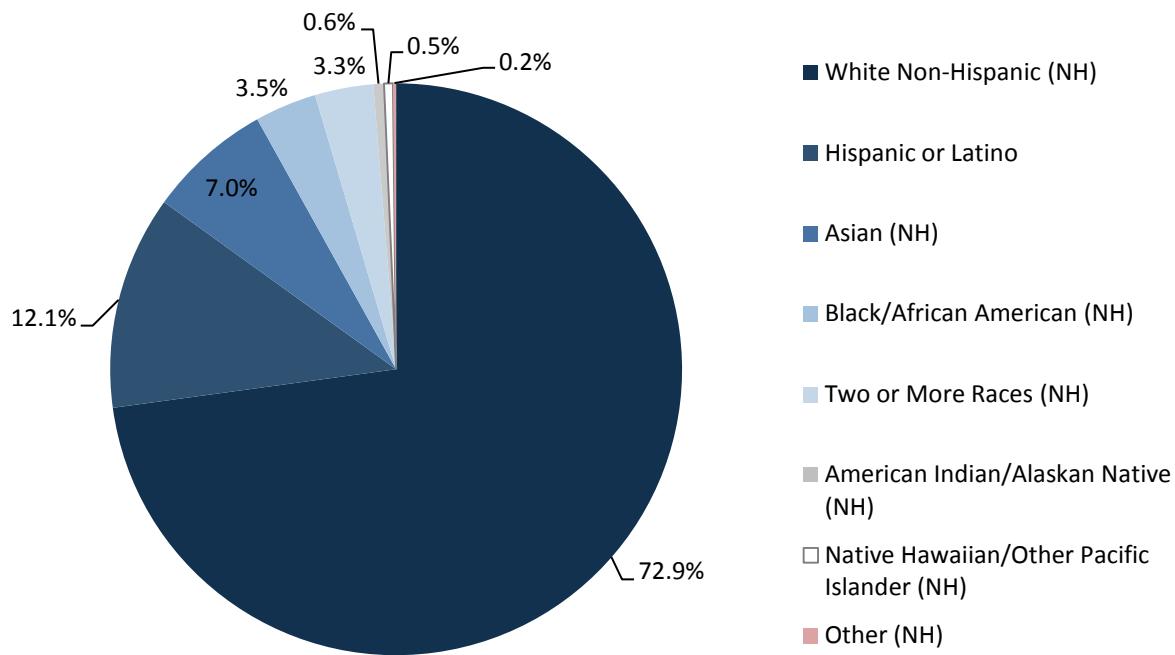
**Figure 1. Ridership by Mode and Day**



#### *Race and Ethnicity – Service Area Profile*

Based on 2010 Census data 27.1 percent of the population within TriMet's service district is considered minority using the definition provided in the FTA Circular 4702.1B. As shown in Figure 2, minority population within TriMet's service district includes Hispanic or Latino (12.1%), Asian (7.0%), Black or African American (3.5%), American Indian or Alaskan Native (0.6%), Native Hawaiian or Other Pacific Islander (0.5%), Two or More Races (3.3%) and Other (0.2%).

**Figure 2. 2010 TriMet Service Area Population Race/Ethnic Characteristics**



### *Income – Service Area Profile*

Based on the 2007-2011 US Census American Community Survey 5-year estimate, 21.9 percent of the population within TriMet’s service district is considered low-income (person whose median household income is at or below 150% of the federal poverty guidelines).

## METHODOLOGY

### *Definition of Major Service Change*

TriMet will consider any service changes that qualify for a public hearing under TriMet Code, Section 18.15 as a “major service change” and in need of analysis under Title VI. Service changes that require a public hearing are as follows:

1. A change in service of:
  - a) 25% or more of the number of transit route miles, or;
  - b) 25% or more of the number of transit revenue vehicle miles of a route on a daily basis for the day of the week for which a change is made, or;
2. A new transit route is established.

## *Quantification of Impacts*

### Ridership

TriMet regularly collects passenger boarding and alighting data via Automatic Passenger Counters (APCs) installed on many of its buses and rail cars. Every trip is sampled multiple times during each quarterly service period resulting in passenger activity data available at the stop level and aggregated quarterly. This quarterly collection of ridership data is the Passenger Census. This analysis uses Passenger Census data from the Fall 2012 quarter. For route changes, ridership (ons and offs) at bus stops on the affected route segment(s) is used.

### Minority and low-Income Populations

Census tract level data is utilized for this analysis. The following data tables were used:

Minority: T55. HISPANIC OR LATINO ORIGIN BY RACE, 2010 Census

Poverty: T117. RATIO OF INCOME TO POVERTY LEVEL, 2007-2011 American Community Survey 5-Year Estimates

### Identification of Impacted Census Tracts and Disproportionate Changes

Stops associated with route segments that have potential changes are considered impacted. Any tract containing an impacted stop is considered impacted. If the percentages for impacted minority and/or low-income populations within the impacted tracts exceed those of the District as a whole, the impact of changes to the route will be considered disproportionate.

TriMet service area thresholds for sensitive populations:

Population	Threshold
Minority	27.1%
Low-Income	21.9%

Figure 3 shows census tracts within the TriMet service and indicates those that are above the minority and/or low-income threshold.

### Defining Alternative Service Availability

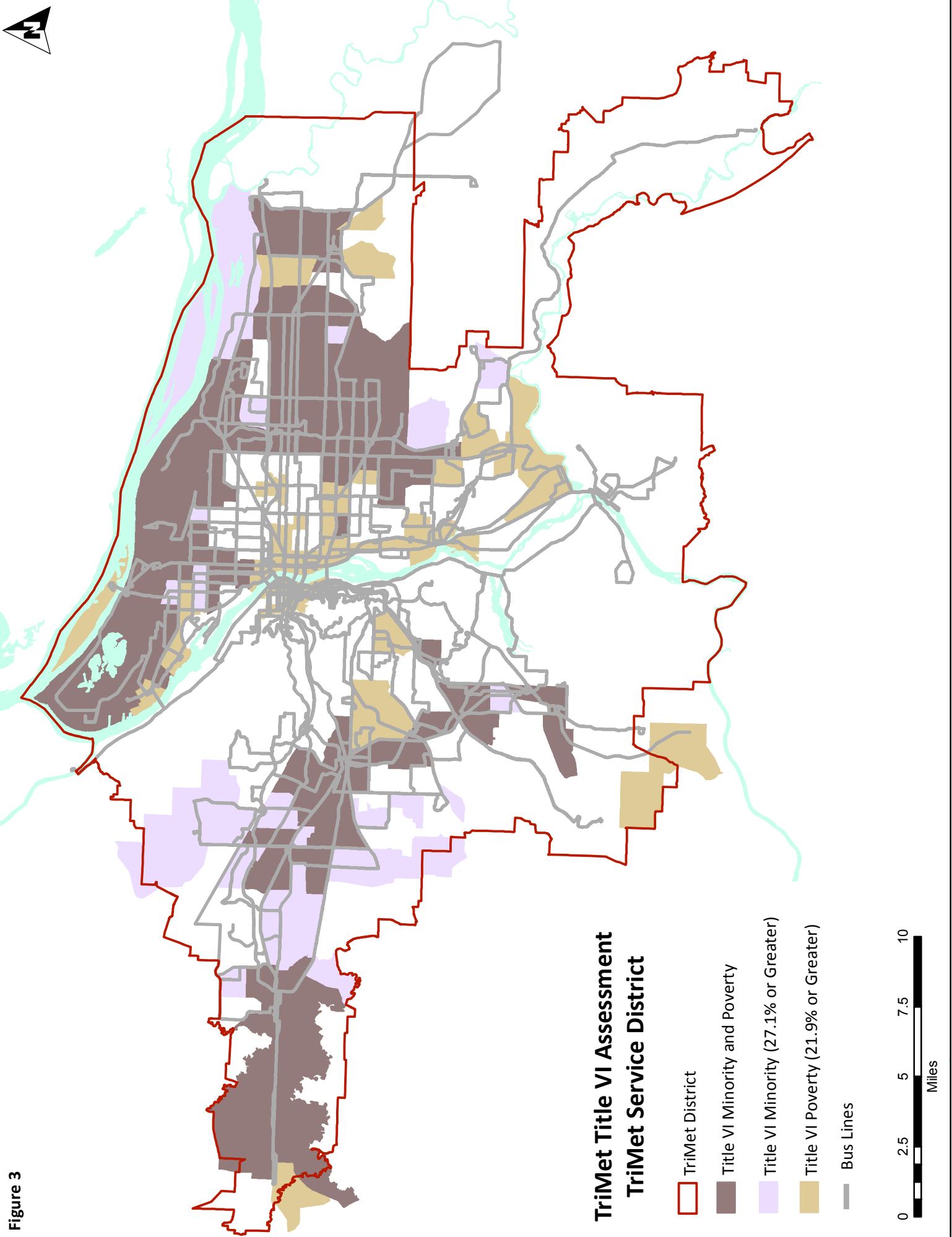
In addition to considering impacts, this analysis will also identify the extent to which there is alternative public transportation service available. Alternative service availability will be rated as fully covered, high,

medium or low according to the criteria described in Table 2. Alternative service is assessed for each stop that Line 47 would no longer serve in the event of the routing change and does not include stops that will be unaffected by the potential route change. Alternative service includes other transit lines directly serving the stop or within  $\frac{1}{2}$  mile or less walking distance. For a portion of trips the use of alternative service would include the need to transfer.

**Table 2. Alternative Service Availability**

Level of Alternative Service Available For Impacted Stops	
<b>Fully Covered</b>	(All impacted stops directly served by one or more other lines, with similar span of service.)
<b>High</b>	(Alternative service within $\frac{1}{4}$ mile or less walking distance for 75% or more of impacted boardings and alightings.)
<b>Medium</b>	(Alternative service within $\frac{1}{2}$ mile or less walking distance for 50% of impacted boardings and alightings.)
<b>Low</b>	(Alternative service greater than $\frac{1}{2}$ mile or less walking distance for 50% of impacted boardings and alightings.)

**Figure 3**



## **ANALYSIS OF SERVICE CHANGE – LINE 47**

### *Overview*

#### **Title VI and Transit Equity Impacts**

Line 47-Baseline/Evergreen's potential route change does impact stops in some census tracts with minority populations higher than the TriMet district average. The minority population of all impacted tracts is 20.6 percent which is less than the TriMet district average of 27.1 percent. No impacted stops are located in a census tract where poverty population is higher than the TriMet district average or where poverty and minority populations are higher than the TriMet district average. A majority of the impacted stops (67.6%) are located in non-minority, non-poverty census tracts (tracts with poverty levels and minority population below the TriMet district average). (See *Figure 5*). Based on this analysis, there is an adverse effect on some riders but not a disparate impact on minority populations.

#### **Access to Alternatives**

Overall, a majority of the impacted stops (77.9%) and ridership (92.5%) are within a  $\frac{1}{4}$  mile of an alternative route; and, only six percent of the stops and 0.5 percent of the ridership are more than  $\frac{1}{2}$  mile from an alternative route (Table 3). Though not all stops are within  $\frac{1}{4}$  mile of alternative service, over 90 percent of the impacted boardings and alightings are within  $\frac{1}{4}$  mile of an alternative, so there is a high level of alternative service availability.

Twenty-two of the impacted stops are located in census tracts where the minority population share is greater than the TriMet district average. Of these, about three-quarters (72.7%) of the stops are less than one-quarter mile from alternative service. Of the total ridership at those stops, 58 percent is within one-quarter mile of alternative service. The remaining 46 impacted stops are located in census tracts where the poverty level and minority population share are both less than the TriMet district average. Of these stops, 80 percent are within a quarter mile of alternative service as is 97 percent of the ridership. (See Table 3).

#### **Service Changes**

*Routing:* Line 47 would run from Hillsboro Transit Center to Portland Community College (PCC) Rock Creek Campus instead of going to Sunset Transit Center. This routing change would create a new connection between the Bethany area and Hillsboro Transit Center (See *Figure 4*).

*Frequency:* Service frequency on Line 47 will be improved, and more frequent service will benefit all trips within the portions of the route illustrated in this analysis, and will also benefit midday and evening trips anywhere on the route. Service in am/pm peak hours between PCC Rock Creek and Orenco/NW 231<sup>st</sup> Ave will be every 15 minutes, compared to current service about every 30 minutes. Midday service would not change, with service every 35 minutes along the entire route. Evening service would run about every 30 minutes, an improvement from about every 60 minutes currently.

*Span:* The times of the first trips of the day will be similar to the present, and service will be extended one hour later in the evening for trips to the Hillsboro Transit Center.

#### *Ridership Impacts*

<b>Line</b>		<b>Ons</b>	<b>Offs</b>	<b>Total</b>
47	Route change	315	349	664

#### *Demographic Impacts*

##### All Impacted Tracts -Current Line 47 Route

<b>Line</b>		<b>Tracts Minority</b>	<b>Minority Threshold</b>	<b>Tracts Poverty</b>	<b>Poverty Threshold</b>
47	Route change	20.6	27.1%	5.4%	21.9%

#### *Available Service Alternatives*

There is a high level of alternative service availability (Table 3 and Figure 5). Bus stops on portions of Cornell Road, Cedar Hills Blvd. and Barnes Road that would no longer be served by Line 47 would continue to be covered by Line 48-Cornell. Table 3 enumerates the available service alternatives stop-by- stop and ridership for impacted stops only, which generally includes stops on and to the east of NW 185<sup>th</sup> Avenue. Seventy-eight percent of impacted stops (53 of 68) are within  $\frac{1}{4}$  mile or less of alternative service. Only four stops are more than  $\frac{1}{2}$  mile from alternative service. These stops are in non-minority, non-poverty census tracts (Figure 5). Though some stops are beyond  $\frac{1}{4}$  mile of alternative service, over 92 percent of the impacted boardings and alightings (614 of 664) are within  $\frac{1}{4}$  mile of an alternative (Table 3 following).

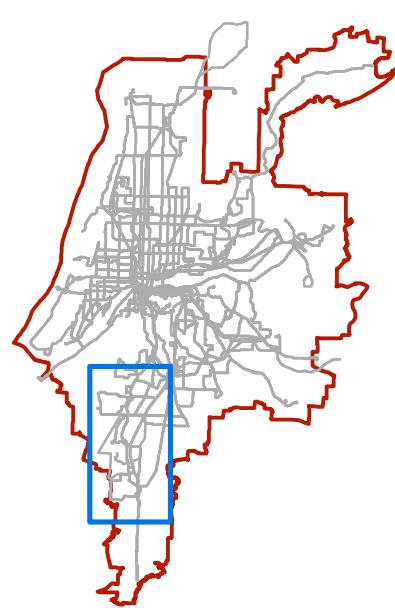
**Table 3. Available Service Alternatives by Stop and Ridership**

	Stops		Ons		Offs		Total	
<b>Minority</b>	22	32.4%	35	11.1%	44	12.6%	79	11.9%
<i>Alternative Service</i>								
Less than ¼ Mile	16	72.7%	21	60.0%	25	56.8.4%	46	58.2%
Between ¼ and ½ Mile	6	27.3%	14	40.0%	19	43.2%	33	41.8%
Greater than ½ Mile	0	0.0%	0	0.0%	0	0.0%	0	0.0%
<b>Poverty</b>	0	0%	0	0%	0	0%	0	0%
<b>Minority &amp; Poverty</b>	0	0%	0	0%	0	0%	0	0%
<b>Non-Minority, Non-Poverty</b>	46	67.6%	280	88.9%	305	87.4%	585	88.1%
<i>Alternative Service</i>								
Less than ¼ Mile	37	80.4%	272	97.1%	296	97.0%	568	97.1%
Between ¼ and ½ Mile	5	10.9%	7	2.5%	7	2.3%	14	2.4%
Greater than ½ Mile	4	8.7%	1	0.4%	2	0.7%	3	0.5%
<b>Total</b>	68	100%	315	100%	349	100%	664	100%
<i>Alternative Service</i>								
Less than ¼ Mile	53	77.9%	293	93.0%	321	92.0%	614	92.5%
Between ¼ and ½ Mile	11	16.2%	21	6.7%	26	7.4%	47	7.1%
Greater than ½ Mile	4	5.9%	1	0.3%	2	0.6%	3	0.5%

NOTE: Some currently served rides to/from locations east of 185<sup>th</sup> may require a transfer with implementation of the potential change to Line 47.

Figure 4

### TriMet Service District Map



### Proposed Change and Alternative Service

Line 47 - Baseline/Evergreen

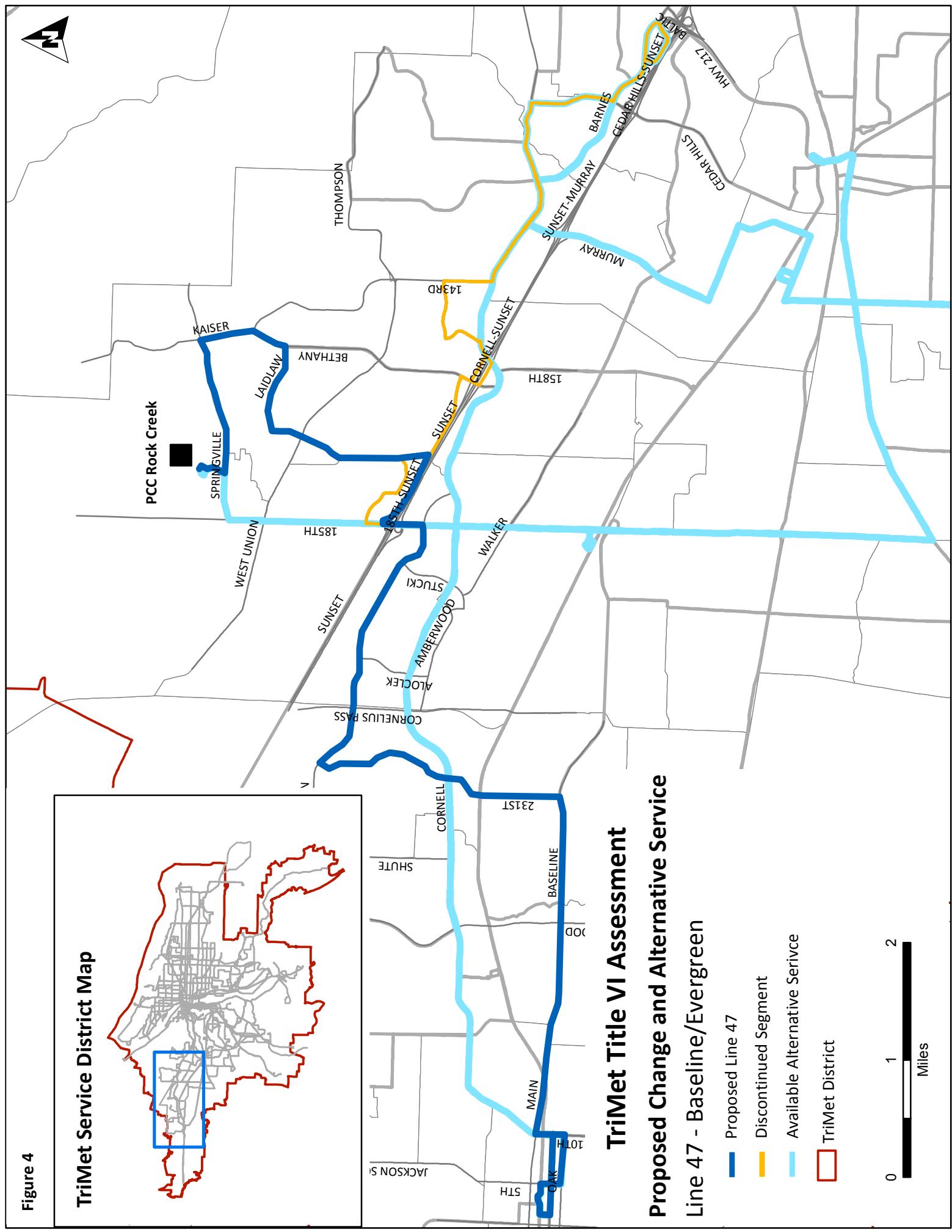
Proposed Line 47

Discontinued Segment

Available Alternative Service

TriMet District

0 1 2 Miles



**Figure 5**

TriMet Title VI Assessment

47 - Baseline/Evergreen

Proposed Line 47

## Discontinued Segment

Available Alternatives

## Alternative Stop Walking Distance

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הנְּצָרָן בְּבִירְעֵל ז' תְּוּמָה

• Between 1/4 and 1/2

- Greater than 1/2 Mile

Outline BUS LINES

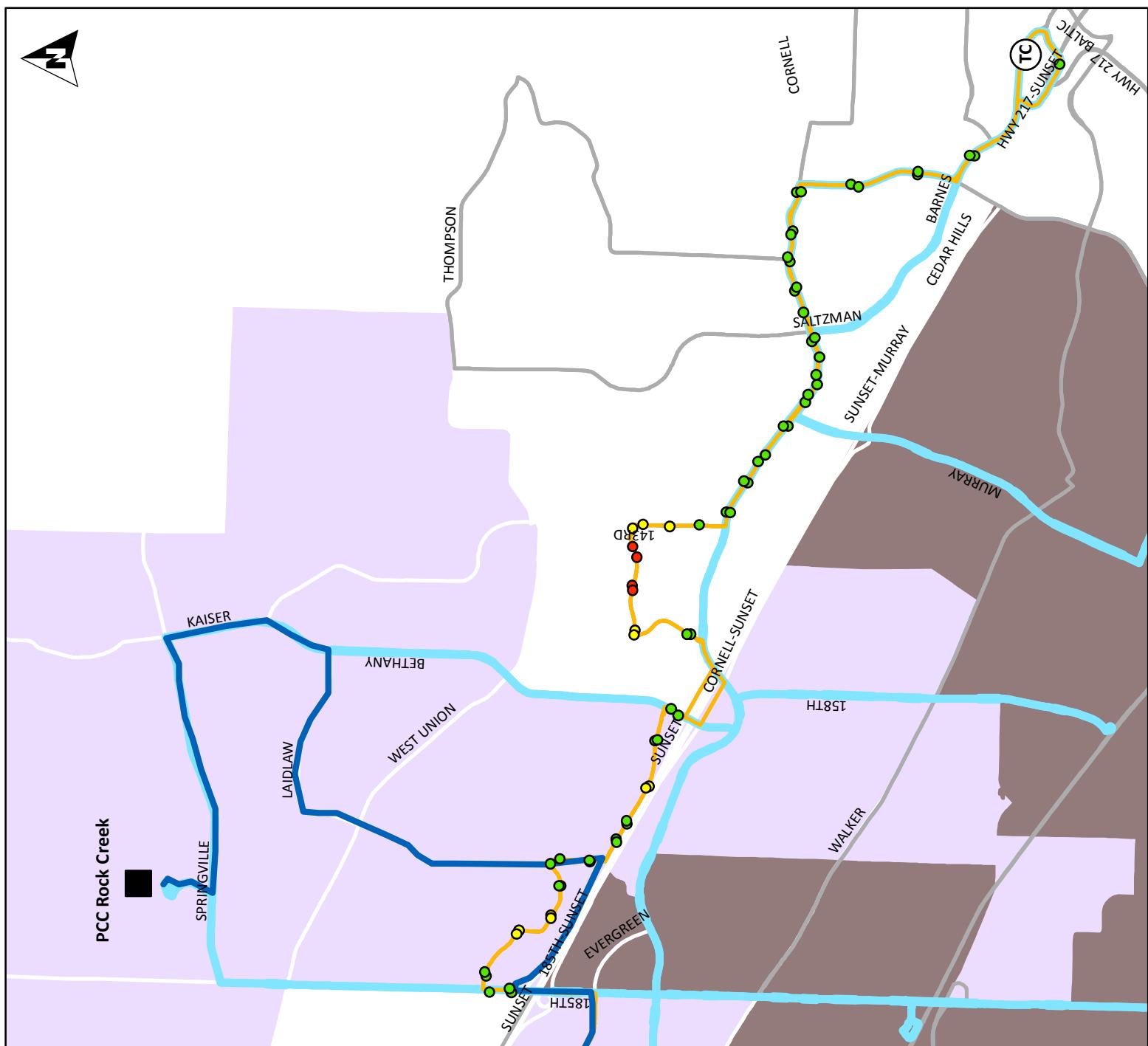
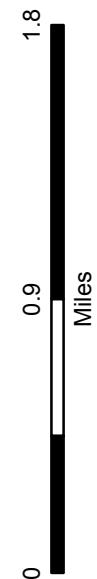
(TC) Transit Center

— 1 —

Title VI Minority: (27.1% of Growth)

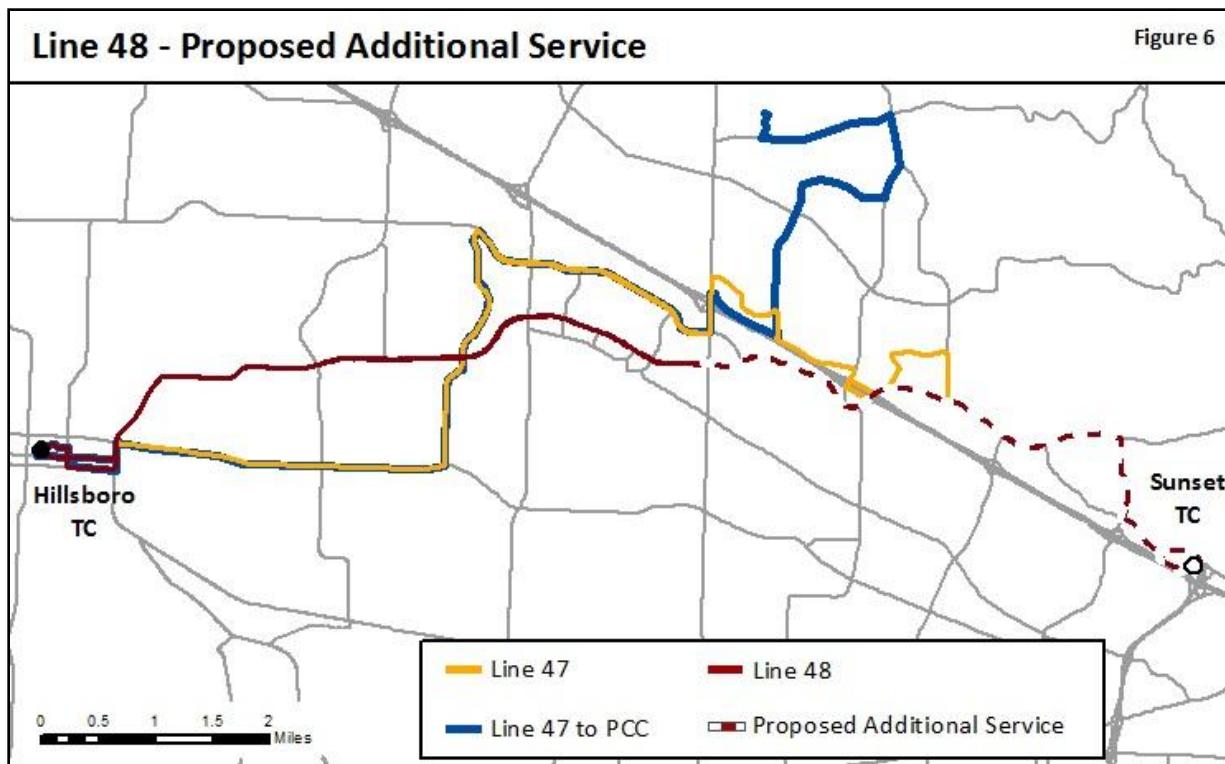
## Title VI Poverty (21.9% or Greater)

Data: TriMet, US Census Bureau



### *Other Mitigation – Changes on Line 48-Cornell*

Service changes are also recommended on Line 48-Cornell including added weekday trips and service ending about 45 minutes later in the evening. During am and pm peaks there would be more trips between NW Stucki Place and the Sunset Transit Center where segments of the present Line 47 overlaps the Line 48 routing (Figure 6). (See *Equity Analysis – Line 48* for more detail.)



More frequent service on Line 48 would provide additional alternative service at 31 of the 68 stops on Line 47 impacted by the Line 47 routing change. This added service on Cornell would offer increased alternative service for approximately 68 percent of total ridership impacted by the Line 47 routing change (Table 4).

**Table 4. Impacted Line 47 Stops and Ridership Benefitted By Additional Line 48 Service**

	<b>Stops</b>	<b>Ons</b>	<b>Offs</b>	<b>Total</b>
<b>Line 47 Impacted Stops and Rides that would benefit by Line 48-Cornell improvements</b>	31 45.6%	265	186	451 67.9%
<b>All Line 47 Impacted Stops and Rides</b>	68	315	349	664

There would be more frequent service in the am/pm peaks under the proposed change and during the evenings (Table 5).

**Table 5. Frequency of Service Between NW Stucki and Sunset Transit Center**

<b>Headways by Period</b>	<b>Current</b> (Line 47 Only)	<b>Current</b> (Lines 47 and 48 shared segments)	<b>Proposed</b> (Line 48 Only)
AM Peak (7-9am)	30-32	14-16	15
Midday	35-40	16-35	35-40
PM Peak (4-6 pm)	36-38	19-20	16-17
Evening	55	20-45*	30-45*

\*45 minutes after 9:00pm

This additional Line 48 service would directly respond to rider feedback expressed in the Line 47 passenger survey (see *Appendix*). Of those surveyed, 76 percent said that they would adjust to the Line 47 route change by taking another transit line, and 62.1 percent would be choosing the Line 48 as their alternative route. This finding supports the idea that, if Line 47 changes its route, there will be additional demand for service on Line 48. Furthermore, 75 percent of those surveyed were commuting to work, which suggests that a substantial share of impacted trips along the route is within peak commuting hours.

## **ANALYSIS OF SERVICE CHANGE – LINE 48**

### **Title VI and Transit Equity Impacts**

Census tracts served by Line 48 have minority population of 35.1%, above the district average of 27.1%. The Line serves tracts with a poverty population 20.0%, somewhat below the district average of 21.9%.

Based on the analysis of proposed changes, no Line 48-Cornell riders would be adversely affected. In the absence of adverse effect there is no disproportionate impact. Likewise, no disproportionate burden impacts on low-income populations were found. The benefits of improved service would generally be available to populations including protected populations in areas served by Line 48.

Service improvements in the segment between the Sunset Transit Center (STC) and Cornell Rd. at NW Stucki Ave. would include:

- Frequency: additional trips during a.m. peak, p.m. peak and evening, with a.m./p.m. peak headways going from 30/36 mins. to 15/16 mins. and evening headways going from 55 to 30-45 mins.
- Span : the last trip of the day in each direction would be about 50 minutes later than at present.

Service improvements in the segment between Cornell Rd. at NW Stucki Ave. and Hillsboro Transit Center (HTC) would include:

- Frequency: additional trips during p.m. peak and evening, with p.m. peak headways going from 36/38 mins. to 32/34mins. and evening headways going from 55 to 30-45 mins.
- Span: the last trip of the day to STC would be about 50 minutes later than at present.

Figure 7 indicates the portion of Line 48 between NW Stucki Ave. and the Sunset Transit Center that would receive most of the additional trips and the demographic make-up of the area Line 48 serves.

### *Service Changes:*

Line 48 would continue to run from Hillsboro Transit Center to Sunset Transit Center on its present routing. However, Line 48 will make 4 additional trips in each direction along the entire line (from 52 to 60 trips per day). In addition, there will be new trips in the a.m. and p.m. peaks and evening in both directions between the Sunset Transit Center and NW Cornell Rd. at NW Stucki Ave. (21 trips per day). These additional trips will double the frequency (from 30-38 minute headways to 15-17 minute headways) during peak commuting hours and reduce evening headways to 45 minutes or less where it currently averages 55-60 minutes.

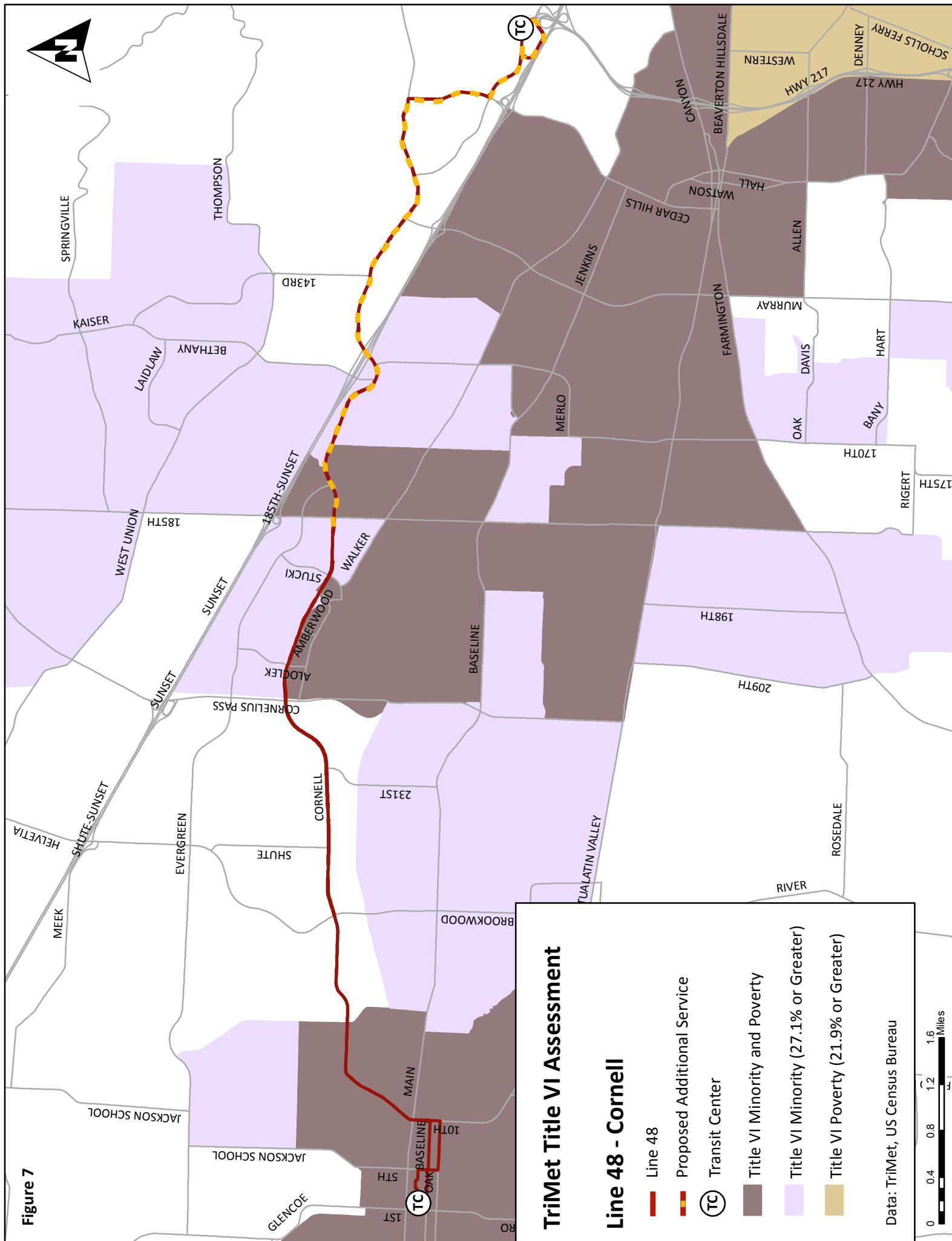
**Weekday:** The first morning trips from Hillsboro Transit Center and Sunset Transit Center would continue run at 5:10am and 5:23am, respectively. However, the last trip from Hillsboro Transit Center would be at 9:11pm instead of 8:19pm. The last trip from Sunset Transit Center would be at 10:38pm instead of 9:54pm.

In the Sunset TC to Stucki Ave. segment, frequency during the peaks (defined as 7:00am-9:00am and 4pm-6:00pm) would be increased so that buses run every 15-20 minutes instead of every 30-40 minutes. Mid-day frequency remains at 35-40 minutes. With the added trips, frequency in the evening is 30-45 minutes; whereas, currently, trips after 6pm only run about every 55-60 minutes..

In the Stucki Ave. to Hillsboro TC segment frequency during the p.m. peak and evening would be improved to every 32-34 mins. from every 36-38 and evening frequency would be every 30-45 minutes.

Line 48 riders would benefit from improved frequency and span of service on weekdays. Average daily ridership on Line 48 in Fall 2012 was 970 boardings.

**Figure 7**



## **CONCLUSIONS**

### *Line 47-Evergreen/Baseline*

Considering recommended changes for Line 47, no Title VI impacts on minority population disproportionate to representation within TriMet's service area were found based on this analysis. Likewise, no disproportionate burden impacts on low-income populations were found.

The recommended routing change for Line 47-Baseline/Evergreen would impact service at 68 bus stops, including 22 stops in minority tracts. This creates an adverse effect on service at some stops including stops in minority tracts; however, it is not a disparate impact. The percentage of minority population among all impacted tracts (20.6 percent) is below the threshold for the TriMet district (27.1%).

In general, most adverse effects for impacted riders are mitigated by alternative service availability. There is a high level of alternative service availability, with some 93 percent of rider ons and offs either directly served by another line or within ¼ mile or less.

Among bus stops in minority tracts, 58 percent of impacted ridership would have a high level of alternative service availability (46 of 79 daily ons and offs). All of the remaining ridership in minority tracts (33 daily ons and offs) would have alternative service available between ¼ and ½ mile.

Added service being recommended on Line 48-Cornell would further reinforce mitigation, resulting in service at impacted stops on Cornell (presently served by Lines 47 and 48) as frequent or better during am/pm peak periods and improved in the evening over present schedules.

It should also be noted that the new alignment for Line 47 would add service and benefit tracts with an above-average concentration of minority population (35.9%) relative to the TriMet district average of 27.1 percent. The revised routing would provide new connectivity between the Hillsboro Transit Center and the Bethany area and Portland Community College at Rock Creek, expected to serve increased ridership overall and benefit all populations along the entirety of Line 47.

### *Line 48-Cornell*

Based on the analysis of proposed changes, no Line 48-Cornell riders would be adversely affected. In the absence of adverse effect there is no disproportionate impact. Likewise, no disproportionate burden impacts on low-income populations were found. The benefits of improved service would generally be available to populations including protected populations in areas served by Line 48.

## APPENDIX

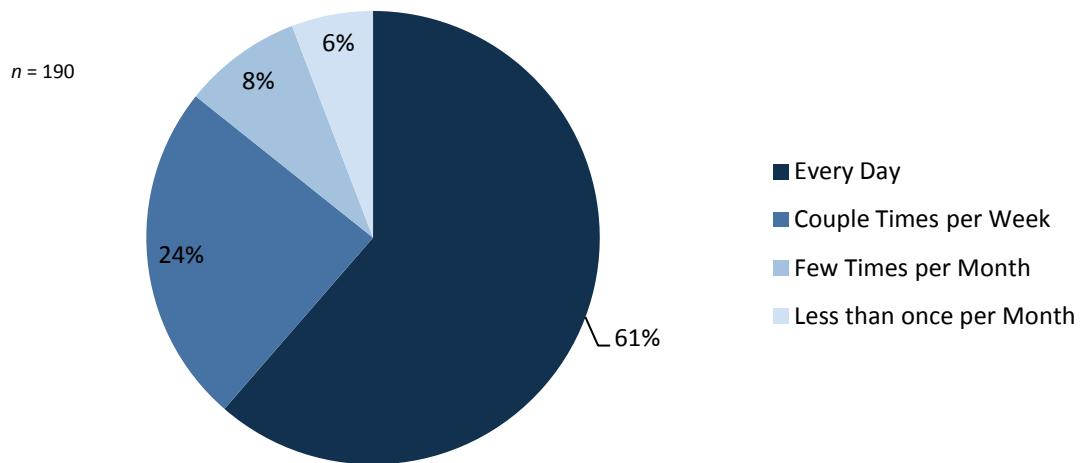
### *Line 47 – Survey*

Passenger intercept surveys were conducted on Line 47 along the impacted area. Passengers were asked to answer eight questions about their starting point, destination, purpose, extent to which they would be affected by the Line 47 route change, and possible alternatives if that change occurred. In total 190 riders were surveyed over three days at which point surveyors were starting to encounter people they had already surveyed.

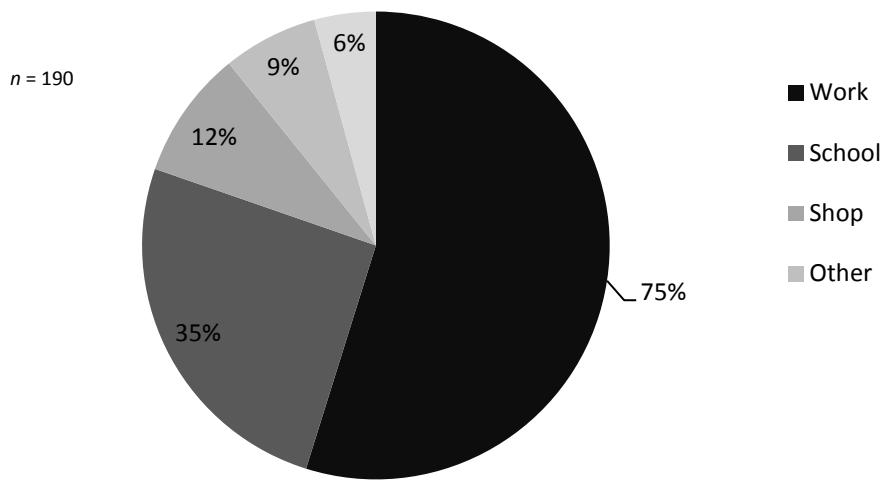
#### Results

Of the 190 riders surveyed 61 percent reported that they ride the bus every day and 75 percent were commuting to work (Figures 8 and 9).

**Figure 8. Survey Response – Ridership Frequency**



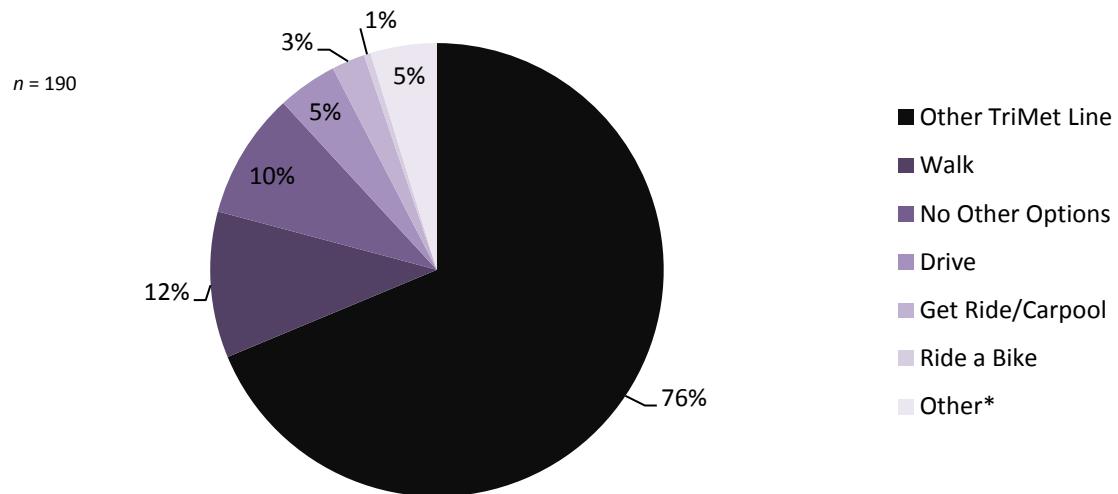
**Figure 9. Survey Response – Purpose of Trip**



NOTE: Respondents were able to specify more than one reason for riding, so total may sum more than 100%

In response to Question 6: “Due to low ridership, TriMet is considering changing this line so it doesn’t serve this area or go to Sunset TC. How would you make this trip if TriMet made this change?” a majority of respondents (76%) reported that they would take another TriMet line and 5 percent said that they would still be able to use Line 47 (see Figure 10). Of those who would switch to another line, most (62.1%) would take Line 48-Cornell; whereas, only 19 respondents (10%) said they would have no alternative transportation. Question 8 asked respondents to categorize their concerns regarding changes to Line 47. The most common responses were reported concerns about loss of service (49%) and frequency (43%); see Table 6.

**Figure 10. Survey Response – Alternative Way to Complete Trip**



\*Included in other (n=10) were 9 responses reporting they could still take Line 47

NOTE: Respondents were able to report more than one alternative trip method, so total may sum more than 100%

**Table 6. Survey Response – Concerns About Service Change**

Concern	
Loss of Service	49%
Frequency	43%
Walking Distance	24%
Not Concerned	8%
Other	6%
Number of Transfers	4%

### *Analysis*

Generally, a majority of surveyed riders commute using Line 47 on a daily basis and are commuting to work. In response to a route change in which Line 47 travels to Portland Community College at Rock Creek instead of going to the Sunset Transit Center, over three-quarters of respondents said that they would complete their trip by using a different TriMet line. Of the 190 respondents, nineteen said they would have no other transit option. Most of the concern about the proposed route change was in regards to loss of service and frequency. Survey comments revealed that riders were concerned about the frequency of Line 48 since it would no longer overlap with Line 47 and about walking conditions between the current Line 47 stops and alternative service. When looking only at responses from riders whose trips occurred only in the impacted area where Line 47 and Line 48 currently overlap, 92 percent report that they would continue to make their trip using TriMet service, mostly via Line 48.

ATTACHMENT L: RIDER DEMOGRAPHIC PROFILE

**TriMet Rider Demographic Profile**  
 2012 Fare Survey  
 Weekday - Bus, MAX, WES

Race/Ethnicity	Frequency	Valid Percent
Non-minority	3,418	72.8
Minority	1,276	27.2
Total	4,695	100.0
<b>How well do you speak English?</b>		
	Frequency	Valid Percent
English: Very well	4,012	93.4
English: Well	198	4.6
English: Not well	25	.6
English: Not at all	7	.2
Spanish: Very well	1	.0
Spanish: Well	4	.1
Spanish: Not well	18	.4
Spanish: Not at all	9	.2
Vietnamese: Very well	3	.1
Vietnamese: Well	2	.0
Vietnamese: Not well	4	.1
Chinese: Well	2	.0
Chinese: Not well	2	.0
Russian: Very well	2	.0
Russian: Well	1	.0
Russian: Not well	2	.0
Korean: Well	1	.0
Korean: Not well	1	.0
Total	4,294	100.0
<b>Household Income (don't know removed)</b>		
	Frequency	Valid Percent
Under \$10,000	858	21.2
\$10,000-\$19,999	506	12.5
\$20,000-\$29,999	651	16.1
\$30,000-\$39,999	378	9.3
\$40,000-\$49,999	355	8.8
\$50,000-\$59,999	266	6.6
\$60,000-\$69,999	223	5.5
\$70,000 or more	817	20.2
Total	4,053	100.0

ATTACHMENT M: TRIP CHARACTERISTICS FOR MINORITY AND NON-MINORITY RIDERS

**Trip Characteristics for Minority and Non-Minority Riders**

2012 Fare Survey

Weekday - Bus, MAX, WES

		Race/ethnicity	
		Non-minority n=3418	Minority n=1276
<b>Route where survey was distributed - group 1</b>			
MAX	41%	36%	
Frequent Service bus	32%	33%	
All other bus	27%	31%	
WES	0%	0%	
Total	100%	100%	
<b>Route where survey was distributed - group 2</b>			
MAX	41%	36%	
Bus radial routes	40%	36%	
Bus crosstown	14%	20%	
Westside feeder	4%	7%	
Bus non-westside feeder	0%	1%	
WES	0%	0%	
Total	100%	100%	
<b>Time period when survey was distributed</b>			
Peak (6-9am, 3-6 pm)	52%	46%	
Midday	30%	35%	
Evening/night	18%	18%	
Total	100%	100%	
<b>Do you have to transfer to or from a different line to make this trip in one direction? <i>Grouped by # of times</i></b>			
No	72%	66%	
Yes, 1 time	24%	29%	
Yes, 2 times	3%	4%	
Yes, 3 or more times	0%	0%	
Total	100%	100%	
<b>Do you have to transfer to or from a different line to make this trip in one direction? <i>Grouped by vehicle transfer</i></b>			
No	72%	66%	
Transfer to Bus(s)	16%	18%	
Transfer to MAX(s)	8%	10%	
Transfer to WES	4%	5%	
Transfer to Streetcar(s)	0%	0%	
Transfer (non-specific)	0%	0%	
Transfer to bus & MAX or WES or Streetcar	0%	0%	
Total	100%	100%	

<b>How did you pay your fare for this trip?</b>		
TriMet fare	99%	98%
C-TRAN fare	1%	1%
Portland Streetcar fare	0%	1%
Total	100%	100%
<b>Which TriMet fare? TYPE</b>		
Cash	22%	26%
Ticket (book of 10)	5%	4%
1-Day Pass	14%	13%
7-Day Pass	1%	2%
14-Day Pass	1%	2%
Monthly/30-Day Pass	30%	26%
Annual Pass (includes TriMet sticker: employee, college, high school)	25%	24%
Other (HC downtown pass, other)	2%	3%
Total	100%	100%
<b>Which TriMet fare? COST</b>		
Adult	59%	53%
Youth	5%	13%
Honored	13%	9%
LIFT	0%	0%
Employer sticker	12%	8%
College sticker	6%	9%
PPS student sticker	3%	6%
HC Downtown Pass	1%	2%
Other	0%	0%
C-TRAN	1%	1%
Total	100%	100%
<b>Is your single-fare payment being used for a one-way or a round-trip?</b>		
One-way trip	94%	92%
Round-trip	6%	8%
Total	100%	100%
<b>Do you have a vehicle you could have used to make this trip either as the driver or as a passenger?</b>		
Yes	50%	37%
No	50%	63%
Total	100%	100%

<b>How many trips have you taken on a TriMet bus/MAX in the last month? (count each direction as one trip)</b>		
Infrequent (less than once/month)	2%	2%
Occasional (couple of times/month)	6%	5%
Regular (several times/week)	27%	30%
Frequent (almost every day)	65%	64%
Total	100%	100%
Mean number of trips	33.8	34.6

<b>What is your age?</b>		
Less than 18	6%	17%
18-24	17%	28%
25-34	28%	24%
35-44	17%	13%
45-54	14%	9%
55-64	13%	7%
65 +	5%	2%
Total	100%	100%
Mean age	37.3	30.6

<b>Race/ethnicity</b>		
Asian/Pacific Islander	-	25%
African American/Black	-	24%
Caucasian/White	100%	-
Hispanic/Latino	-	26%
Multi-racial/bi-racial	-	18%
Other	-	7%
Total	100%	100%

<b>Annual household income before taxes in 2011 NOTE: Don't know removed</b>		
Under \$10,000	18%	29%
\$10,000-\$19,999	12%	12%
\$20,000-\$29,999	16%	17%
\$30,000-\$39,999	9%	11%
\$40,000-\$49,999	9%	8%
\$50,000-\$59,999	7%	5%
\$60,000-\$69,999	6%	5%
\$70,000 or more	23%	13%
Total	100%	100%

<b>Do you speak a language other than English at home?</b>		
Yes	7%	41%
No	93%	59%
Total	100%	100%

<b>If yes, which language? NOTE: 30% did not specify language. Those cases were distributed in the same proportion as those specifying language.</b>		
Spanish	53%	61%
Vietnamese	-	13%
Chinese	1%	11%
Russian	25%	0%
Korean	2%	2%
Japanese	4%	5%
Ukrainian	1%	-
Romanian	5%	-
Tagalog	2%	5%
Arabic	3%	1%
Mon-Khmer, Cambodian	1%	-
Somali	-	-
Hmong	-	1%
American Sign Language	3%	1%
Total	100%	100%

<b>How well do you speak English?</b>		
English: Very well	97%	84%
English: Well	2%	11%
English: Not well	0%	2%
English: Not at all	0%	0%
Spanish: Very well	-	0%
Spanish: Well	-	0%
Spanish: Not well	-	1%
Spanish: Not at all	-	1%
Vietnamese: Very well	-	0%
Vietnamese: Well	-	0%
Vietnamese: Not well	0%	0%
Chinese: Well	-	0%
Chinese: Not well	-	0%
Russian: Very well	0%	0%
Russian: Well	0%	-
Russian: Not well	0%	-
Korean: Well	-	0%
Korean: Not well	-	0%
Total	100%	100%

ATTACHMENT N: FARE PAYMENT BY HOUSEHOLD INCOME

**Fare Payment by Household Income**

2012 Fare Survey

Weekday - Bus, MAX, WES

	Household income					
	Under \$10,000 n=858	\$10,000-\$19,999 n=506	\$20,000-\$29,999 n=651	\$30,000-\$39,999 n=378	\$40,000-\$49,999 n=355	\$50,000 or more n=1306
<b>Which TriMet fare? TYPE</b>						
Cash	28%	28%	27%	22%	23%	15%
Ticket (book of 10)	3%	4%	3%	7%	6%	7%
1-Day Pass	16%	20%	17%	14%	14%	12%
7-Day Pass	1%	1%	1%	2%	2%	1%
14-Day Pass	1%	2%	2%	1%	1%	1%
Monthly/30-Day Pass	30%	29%	30%	29%	27%	26%
Annual Pass (includes TriMet sticker: employee, college, high school)	17%	12%	17%	22%	24%	37%
Other (HC downtown pass, other)	4%	3%	2%	2%	3%	2%
Total	100%	100%	100%	100%	100%	100%
<b>Which TriMet fare? COST</b>						
Adult	51%	64%	68%	66%	68%	61%
Youth	7%	3%	3%	4%	1%	2%
Honored	23%	20%	11%	10%	7%	6%
LIFT	0%	0%	0%	0%	0%	0%
Employer sticker	1%	2%	7%	12%	15%	25%
College sticker	12%	7%	7%	4%	4%	3%
PPS student sticker	1%	1%	1%	1%	1%	2%
HC Downtown Pass	4%	2%	2%	1%	1%	1%
Other	0%	0%	0%	0%	1%	1%
C-TRAN	0%	1%	1%	1%	1%	1%
Total	100%	100%	100%	100%	100%	100%

ATTACHMENT O: COMMUNITY FORUM COMMENTS



**TriMet Community Forum on Fair & Equitable Transit**  
October 7 – November 6, 2013  
**Web Survey**

- 1. During TriMet's planning process, what advice would you give them to make sure low income people and People of Color receive the same benefits as other riders from transit investments and service changes?**
  - a. Ensure that public transportation is easily accessible. There has been a demographic change where low-income people live outside the city limits.
  - b. You need to have a low income ticket available. Customer needs to prove that they have low income and a job for this to work. My family member only makes 1000.00 a month and 100 of that money goes to a monthly bus pass. You doubled it. Its unfair and he is forced to walk from 112 th and holgate to 40 and glisan to get to work and back. He has been mugged twice and is now in the hospital because of no safe affordable bus rides.
  - c. Work with the city of Portland in a holistic way to make sure that populations of color are distributed EVENLY throughout the city rather than marginalized to the periphery.
  - d. Survey riders to monitor who is using the system and in what way.
- 2. When making transit investments or service changes, what should TriMet do to protect low-income people and People of Color from unfair treatment?**
  - a. Could offer them a sliding fee scale for fares (according to income)...make sure transit is readily available to them.
  - b. Keep the poor able to get the 54.00 ticket a month. Colorado has nothing to do with it. Low income does.
  - c. Focus service and infrastructure improvements in areas of diversity.
  - d. Compare goals against actual ridership statistics.
- 3. If the threshold for "Major Service Change" is too low, this could extend the time it takes to adjust service on the street to address issues such as crowding or unreliable service. However, if the threshold is too high, possible negative effects of some changes could be overlooked. Considering this balance, does the 25% threshold seem appropriate to you? If not, how would you change it?**

- a. Not really understanding the percentage for threshold; however, I ride the #25 and really believe this line is 'under-utilized'. This line should be combined with another line. Those of us who ride, need this line...I've seen others walking over 1/2 mile to get to the max because the bus only runs every 70 minutes
  - b. Just as I said before. It should be fair for low income people to ride bus too with a more affordable price.
- c. The 25% threshold seems appropriate
  - d. yes
4. Do you agree with using the same threshold for all types of service changes, i.e. changes in frequency, service start/end times, and route length?
- a. I'm not concerned with that.
  - b. Yes
  - c. no - lower threshold needed for start/end times or elimination of service (including cancellation of weekend service)
5. How would you define a "disparity" between minority and non-minority populations when it comes to the impacts of changes in transit fares and service?
- a. If one person makes. Lets say 1400. Per month they should be allowed the cheaper price for only the monthly bus pass. Daily rides should stay the same. It would take planning on the burdened person but worth every penny to buy the cheaper ticket.
  - b. Reduced schedules are a major disparity for minorities who have fewer options for transportation and are likely to need more and extended transit service in order to engage in employment.
  - c. I would include all those riders who receive free or heavily subsidized transit - after all, changes in fares don't affect them but affect those who pay cash.
6. Does our Disparate Impact Policy fit within your definition? Why or why not?
- a. Yes

b. Yes

c. Does not include alternatives - do users have access to alternate transportation? Also ignores ability to pay/access to subsidized passes.

**7. Considering how you defined "disparity" between minority and non-minority populations, would you use the same definition for a disparity in burdens on low-income and non-low-income populations? If not, how would your definition be different?**

a. I agree with this statement but colored persons is not politically correct.

b. Yes

c. Some consideration should be given to transportation's share of household budgets.

**8. Does our Disproportionate Burden Policy fit within your definition? Why or why not?**

a. I'm not sure and I'm still confused on all of what is meant by this.

b. Yes

c. Ignores transit dependent populations.

**9. Which of these low-income definitions makes the most sense to you? (Everyone with income less than these thresholds would be included as low-income.)**

a. 150% Federal poverty level

b. 100% Federal poverty level

c. 200% Federal poverty level



## TriMet Community Forum on Fair & Equitable Transit

Wednesday, November 6, 2013. 6:00 p.m. – 8:00 p.m.

Museum of the Oregon Territory

211 Tumwater Dr., Oregon City, OR 97045

**Clackamas County**

- 1. During TriMet's planning process, what advice would you give them to make sure low income people and People of Color receive the same benefits as other riders from transit investments and service changes?**
  - a. Look at equity rather than equality. Ex. When looking at fare increase, 10% is different depending on income percentage of income spent on fixed cost
  - b. Access to basic service
  - c. Rural vs. Urban when comparing to general ridership.
  - d. Need apples to apples comparison. Collaborating needs to be much collaboration share burden/ share benefit look for opportunities in rural areas.
  - e. Include people with disabilities in equity discussion. Services taken away and not restored while other services have been restored.
  - f. Board meeting at a more accessible time ex. Evening
  - g. Equip service providers w/ info to connect w/ pop better partnerships social service.
- 2. When making transit investments or service changes, what should TriMet do to protect low-income people and People of Color from unfair treatment?**
  - a. This process But, the burden is on TriMet not the people
  - b. Collaboration with advocacy groups
  - c. Better communication about transit mitigation programs- regular ongoing outreach.
  - d. Transit dependent population needs to be a weighted factor in all decisions.
  - e. Medical transportation program example. Policies need to reflect reality
  - f. Policy makers do a “TriMet Challenge”
- 3. What comes to mind when you hear the phrase “major service change”? Can you think of any examples you’ve witnessed or experienced?**
  - a. Time, evening service
  - b. Sounds like a cop-out “it’s not a major service change, it’s only”

- c. Consistency
  - d. What is major in one area, may not be “major” in another.
  - e. Ex. 31 Estacada comes to mind I have seen crowded routes (#35) passes the stop because it's too crowded
  - f. 25% rule doesn't work across the board
  - g. Lower threshold for time and length to 10%
  - h. More individualized impacts. From 1.5 hours – 3 hours commute longer transfers at night.
  - i. Crosswalks sidewalks streetlights safety access bring back flashy light- more publicity
  - j. Line 57 only major line through Forest Grove Shuttle to main stop? Busses very full more service
  - k. More coverage stops, Bus Rapid Transit
4. **What do you see as inequities between minority and non-minority people when it comes to the impacts of changes in transit fares and service? Does TriMet's Disparate Impact Policy fit with what you answered?**
- a. No broadly defined Not IF but how much
  - b. 25% seems very high particularly for hours.
  - c. Similar to affirmative action, need to measure benefits to create opportunities
  - d. Move services with changes in minority demographics. Don't worry so much about the impact to non – minority, non income folks.
  - e. Multi/Bi-lingual bus operators on lines that serve higher non-English pop match drivers language w/pop served language.
  - f. Use more pictures to get messages across. Signs in multi languages.
  - g. Screen display on bus English and Spanish/ Volunteers on bus to translate btw driver and riders.
  - h. Ride wise to work w/ folks in different culture/ language.
5. **What do you see as inequities between low-income and non-low-income people when it comes to the impacts of changes in transit fares and service? Does TriMet's Disproportionate Burden Policy fit with what you answered?**
- a. No need to leverage the knowledge of community partners. Get data. Include it in the model.
  - b. More outreach. Need more information.
  - c. Mitigation program doesn't necessarily assist the actual population it was put in place to mitigate for.

- d. Revisit program to combat fare change impact on low income underutilized not reaching enough pop
  - e. More service to rural areas impact other challenge
  - f. More accessible low cost tickets to individuals accessible admin services. Ex. Honored cit. passes in clack co. not downtown Portland.
  - g. Announcements/ board meetings on public access channel broader outreach/ transparency
  - h. Vary times and locations of community forums Milwaukie Estacada on bus lines.
  - i. Outside/ visible outreach during nice weather. Red soils campus in Oregon City.
6. **Which of these definitions of low-income makes the most sense to you? (*Everyone with income less than these thresholds would be included as low-income*):**
- a. **100% Federal Poverty Level**
  - b. **150% Federal Poverty Level**
  - c. **200% Federal Poverty Level**
    - i. Look at Food Stamp/SNAP standards
    - ii. 200% Federal Poverty Level
    - iii. Depends on how many of your expenses are fixed. Threshold could match other agencies such as SNAP 185%
    - iv. Using a threshold not based on federal poverty line. EX percentage of fixed expenses.



## TriMet Community Forum on Fair & Equitable Transit

October 29, 2013. 6:00 p.m. – 8:00 p.m.

Immigrant & Refugee Community Organization (IRCO),  
10301 NE Glisan St, Portland, OR 97220

**Multnomah County**

- 1. During TriMet's planning process, what advice would you give them to make sure low income people and People of Color receive the same benefits as other riders from transit investments and service changes?**
  - a. What can be gathered from the notes in other sections is for TriMet to take in consideration the changing demographics, the increase its ability to serve different populations via more cultural diversity training and to make sure it provides information in different languages to the growing and diverse population. Also, make sure implementation of mitigation strategies actually reach impacted populations.
  - b. Decent treatment
  - c. Cultural diversity classes for operators.
  - d. Information provided in different languages.
  - e. Directly ask transit dependant low income and PDC their opinions on policy changes/ updates
  - f. Survey people on transit. Community partners transit employees. Ensure outreach in multiple languages.
  - g. If racial profiling is happening during fair inspection work to end it.
  - h. Broader outreach for community forums like these and ensure translation/interpretation of several languages.
  - i. More surveys at beginning and end of bus/max lines. Increased outreach in low income and poc communities.
  - j. Cumulative financial impacts- provide info broadly
  - k. Clarify low income- include cola and consider people who zero/ stagnant income
  - l. Understand baseline conditions rather than just changes
  - m. Analyze destinations and their benefit to disadvantaged populations.( accessing, sues, opportunity.

**2. When making transit investments or service changes, what should TriMet do to protect low-income people and People of Color from unfair treatment?**

- a. After 9 or 10 p.m. that there be free trips.
- b. Buses to run longer at night (beyond 2 a.m.) so service workers have a way to get home.
- c. Cost is too high
- d. Do not charge fares to children under 12.
- e. Lower the price and increase the duration of the ticket (more hours), particularly on the weekends.
- f. Have the price of the fares be fixed (the same) for a number of years.
- g. Use The Pearl district as litmus test for future transit investments and use service changes. If they give the ole it is ok by broader community.
- h. Provide a fare discount to low income people who can prove it w/ food stamps, subsidized housing.
- i. Try to make investments in transit that may not be perfect, but favor low income and people of color (access, frequency, fares)
- j. Sliding scale fares (based on ability to pay) esp. passes.
- k. Consider more than just low income people of color, but broader SES considerations “paint with a wider brush”
- l. Partnerships w/ CBO’s

**3. What comes to mind when you hear the phrase “major service change”? Can you think of any examples you’ve witnessed or experienced?**

- a. Participants suggested lowering the threshold from 25% to 10% as the cuts in service have already been too much namely in places in the outskirts of the city. What they see is that the trips are taking longer to make and the fare expires before they are able to complete their trip.
- b. Not my line
- c. Any service / fare cuts (service cuts can destroy connectivity)
- d. Any impacts to travel time
- e. Any changes in frequency is significant (time increase and increase in # of people boarding)

- f. Bring fare less square back
- g. Any elimination in service
- h. Route changes
- i. Change name and number of bus
- j. Change the way you pay fare
- k. Change in hours (shift)
- l. “major” is subjective (even minutes can impact people)
- m. Number of crunching not enough

**4. What do you see as inequities between minority and non-minority people when it comes to the impacts of changes in transit fares and service? Does TriMet's Disparate Impact Policy fit with what you answered?**

- a. In general the proposed policies are fine. They like the mitigation strategy of investment to mitigate the impact of fare changes are well intentioned. Unfortunately, it does not reach all the people that are impacted by the fare changes. The population continues to grow. The policies or regulations are not uniformly (evenly) applied so there is inequity there. Current prices are out of reach for low income communities. This is true, in particular, for families who have a higher number of children who are unable to afford take all their children on their trips. As many buy tickets individually for the whole day this is indicated as being a limitation. Participants stressed the importance of increase the duration of the time for individual tickets as some buses run late and they are not able to complete their trip.
- b. Why is streetcar \$1.00 and TriMet fare much higher (streetcar serves mostly white affluent people tares?)
- c. Raising streetcar fare could offset future fare hikes
- d. Monthly passes ( buy 1 get a better deal- but less pocket low come can't pay for monthly pass up front)
- e. Enforce fare at TriMet stops happens in poc communities but not as much on max. more low income and poc ride buses.
- f. What if cuts to one line occur so that others can benefit more greatly from service

**5. What do you see as inequities between low-income and non-low-income people when it comes to the impacts of changes in transit fares and service? Does TriMet's Disproportionate Burden Policy fit with what you answered?**

- a. Greater % of income paid for fair
- b. Density and location impact travel times (extra hour would make a difference )
- c. Consider when driving is not an option (transit dependence)
- d. Better amenities in low income communities (or at least = to up income) i.e. bus stops by walls, garbage cans design
- e. Safety issues for low income areas (personal and public safety)

**6. Which of these definitions of low-income makes the most sense to you? (*Everyone with income less than these thresholds would be included as low-income*): 100% Federal Poverty Level 150% Federal Poverty Level 200% Federal Poverty Level)**

- a. Participants on this one left it at 150%. There was not one participant at the 200% level that made that kind of money.
- b. It is \$4800 a year after taxes for family of 4 to get each hold monthly pass huge % of net monthly income.
- c. 150% good
- d. Look at other organizations.

## Comment Cards

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Have facilitators (trainers?) for drivers to have patience with us when we board. And for them to understand mothers who have little children on baby strollers. Allow time for them to seat down. Thanks

Wendy Yah Canel  
6830 NE Killingsworth, Portland, OR 97218

We ask TriMet that in meetings like this do not have only one person interpret and do another activity because we think it is too much work. We hope you take this into consideration for other meetings. Have another person more to help Mr. Martin Gonzalez

Pedro Moreno

I want the board of directors to help us add another hour to the ticket that cost \$2.50. Also for buses to run every 15 minutes in main streets and those that are not main streets.

*Susana Pacheco*

*5205 NE Killingsworth, #622, Portland, OR 97218*

Next time please have a staff person facilitate the Spanish-speaking group and another staff person doing the interpreting. It is too much for one person to do both. Martin had to make sure that all notes were in order and prep for the comments time for all groups. This made it impossible for him to interpret what the other groups were presenting. Thank you so much. He did a great job.

*Teresa Keishi Soto*

*12540 SE Powell Blvd. #1, Portland, OR 97236*



## TriMet Community Forum on Fair & Equitable Transit

October 24, 2013—6:00 to 8:00 p.m.

Portland Community College Willow Creek Campus  
241 SW Edgeway Dr, Beaverton, Oregon  
**Washington County**

- 1. During TriMet's planning process, what advice would you give them to make sure low income people and People of Color receive the same benefits as other riders from transit investments and service changes?**
  - a. Providing information through more venues, better signage, and better distribution of information when changes happen. Engaging faith based organizations when distributing information, low income provider service centers alternative media sources (i.e. lower circulate news outlets) employers providing information to employees – better engagement.
  - b. Timing - start process early
  - c. Meaningful - truly take in - consider forum input
- 2. When making transit investments or service changes, what should TriMet do to protect low-income people and People of Color from unfair treatment?**
  - a. More security for ridership personal safety. Ex. extra service/security for special events such as sporting events- hope for this during other times ridership discrimination concerns, TriMet taking more proactive approaches, ex different language on buses/max. TriMet committees need to represent minority underserved communities. Recognizing different sub groups within minority groups. More attention at the policy level –applying an equity lens across the board.
  - b. (Credit for forums) Find out how different people use transit differently.
  - c. Transfer times depending on locations- example travel Beaverton-Forest Grove only one line.
  - d. Wait times too long sometimes 45 minute wait time is done by time (2hr) get to appointment 2hr transfer time limited and distance traveled.
  - e. Washington County more people rely on bus.
  - f. Improve visibility night and access- sidewalks/crossing in certain areas.
  - g. Farmington road and other areas like Aloha-Reedville Lack shelter- issues of safety
  - h. Increase security- panhandling addressing issues of violation of code cleanliness.

- i. Making sure vehicles are clean max consideration for using personnel while vehicles are operating
  - j. Discrimination on enforcement
  - k. 88 bus certain area not safe to board.
- 3. What comes to mind when you hear the phrase “major service change”? Can you think of any examples you’ve witnessed or experienced?**
- a. More phased in approach to fare changes-service changes. Attention to time schedules for service challenging to meet ridership request threshold are challenging to define due to perspective. Safety impact of service change is important to consider.
- 4. What do you see as inequities between minority and non-minority people when it comes to the impacts of changes in transit fares and service? Does TriMet’s Disparate Impact Policy fit with what you answered?**
- a. Ridership profiling concerns. Fare question concerns- low income options.
- 5. What do you see as inequities between low-income and non-low-income people when it comes to the impacts of changes in transit fares and service? Does TriMet’s Disproportionate Burden Policy fit with what you answered?**
- a. Low income fare options feasibility.
  - b. Cash fare more expensive for low income people who are not available to buy monthly pass-proposal to lower cash fare
  - c. Cash fare price- poses challenge for rider who cannot afford it leaving them opt to walk.
  - d. Limited assistance by social succ. Organizations- challenge for large families
- 6. Which of these definitions of low-income makes the most sense to you? (*Everyone with income less than these thresholds would be included as low-income*):100% Federal Poverty Level 150% Federal Poverty Level 200% Federal Poverty Level)**
- a. Possibility of locally defined poverty level? Area specific concerns related to service provided dependent on payroll tax contributions.
  - b. Cost of fare- for students to participate in after school activities- no program available
  - c. To address needs of students from low income families.

# Comment Cards

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I respect TriMet. TriMet is my method of getting around. The few problems I have include the trash on board the vehicles. I pick up the trash and dispose of it at the next MAX station.

Colin Cartwright  
127 NW 6<sup>th</sup> Ave, Apt. 205, Portland, OR 97209  
[Carco92@gmail.com](mailto:Carco92@gmail.com)

Thank you for having this forum. Great job of listening to input. Please provide updates through your website and/or emails about these meetings of how the public input is being used.

Sage  
[Sagekat3@gmail.com](mailto:Sagekat3@gmail.com)

Unsafe bus stop on Bethany and Cornell near Burger King. Clients with disabilities that work for Edward Enterprises feel unsafe when going out to catch the bus because the stop is under construction and they have to wheel their wheel chairs in the street to get on to the bus.

Elysabeth Salazar  
1030 SW Jefferson St, Portland, OR 97201  
[elysabetsalazar@yahoo.com](mailto:elysabetsalazar@yahoo.com)

Kudos. Very happy to see these initiatives and open dialogue. My main concern is fare and not removing public transportation as an option with price increases. I think there's infinite discussion on this topic and a lot of options available to be equitable by not risk making tickets too expensive. Is there a way maybe if prices increase in the future to clock a family/individual at a fixed price? Early announcements to several outlets are crucial. Thank you.

Noe Zepeda  
16500 SW 93<sup>rd</sup>, Tigard, OR 97224  
[Nzeepeda2@gmail.com](mailto:Nzeepeda2@gmail.com)