October 18, 2011

Mr. Neil McFarlane
General Manager
TriMet
4012 S.E 17th Avenue
Portland, OR 97202-7773

Re: Federal Transit Administration FY 2011 Triennial Review

Dear Mr. McFarlane:

Enclosed is a copy of the final report of the Federal Transit Administration’s (FTA) Triennial Review of the Tri-County Metropolitan Transportation District of Oregon (TriMet) as required by 49 USC 5307 (i). Although less exacting than an audit, the Triennial Review is the FTA’s assessment of TriMet’s compliance with Federal requirements determined by the examination of grant management practices and program implementation.

The Triennial Review examines 24 areas. Deficiencies were found in Maintenance. No deficiencies were related to ARRA grants. No deficiencies were repeated from the last review. The deficiencies and corrective actions to be taken are described in the report.

Please convey our appreciation to your staff for the assistance and cooperation they provided to the FTA review team. If you have any questions or comments, please contact me at (206) 220-7521 or Kenneth.Feldman@dot.gov.

Sincerely,

Kenneth A. Feldman
Director, Office of Program Management and Oversight

Enclosure
FINAL REPORT

FY2011 TRIENNIAL REVIEW

of the

Tri-County Metropolitan Transportation District of Oregon
(TriMet)
Portland, Oregon
Recipient ID: 1728

Desk Review: June 8, 2011
Site Visit: September 26 to 28, 2011

October 2011

Prepared for the
Federal Transit Administration
Region 10
Seattle, Washington

by

CDI/DCI Joint Venture
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I. TRIENNIAL REVIEW BACKGROUND

The United States Code, chapter 53 of title 49, requires the Federal Transit Administration (FTA) of the United States Department of Transportation (USDOT) to perform reviews and evaluations of Urbanized Area Formula Grant activities at least every three years. This requirement is contained in 49 U.S.C. 5307(i).

(2) At least once every three years, the Secretary shall review and evaluate completely the performance of a recipient in carrying out the recipient’s program, specifically referring to compliance with statutory and administrative requirements and the extent to which actual program activities are consistent with the activities proposed under subsection (d) of this section and the planning process required under sections 5303-5306 of this title.

(3) The Secretary may take appropriate action consistent with the review, audit and evaluation under this subsection, including making an appropriate adjustment in the amount of a grant or withdrawing the grant.

The Triennial Review includes a review of the grantee’s compliance in 24 areas. The basic requirements for each of these areas are summarized below.

This report presents the findings from the Triennial Review of the Tri-County Metropolitan Transportation District of Oregon (TriMet) of Portland, Oregon. This review was performed in accordance with FTA procedures (published in FTA Order 9010.1B, April 5, 1993) and included preliminary reviews of documents on file at the Region 10 Office in Seattle and on-site discussions and review of the procedures, practices, and records of TriMet as deemed necessary. The review concentrated primarily on procedures and practices employed during the past three years; however, coverage was extended to earlier periods as needed to assess the policies in place and the management of grants. During the site visit, administrative and statutory requirements were discussed, documents were reviewed, and facilities were toured. Specific documents examined during the Triennial Review are available in FTA’s and TriMet’s files.

II. REVIEW PROCESS

The desk review was conducted in the Region 10 Office on June 8, 2011. Following the desk review, a review package was sent to TriMet advising it of the site visit and indicating additional information that would be needed and issues that would be discussed.

The site visit to TriMet occurred from September 26 to 28, 2011. The individuals participating in the review are listed in Section VII of this report.

At the entrance conference, the purpose of the Triennial Review and the review process were discussed. During the site visit, administrative and statutory requirements were discussed
and documents were reviewed. TriMet’s facilities were visited to provide an overview of activities related to FTA-funded projects. A sample of maintenance records for FTA-funded vehicles was examined during the site visit.

Upon completion of the review, an exit conference was held with TriMet staff to discuss findings, corrective actions, and schedules. This information is summarized in the table in Section V of this report. A draft copy of this report was provided to TriMet at the exit conference.

III. DESCRIPTION OF THE GRANTEE

The Tri-County Metropolitan Transportation District of Oregon (TriMet) provides public transit service in Portland, Oregon and the surrounding portions of Multnomah, Clackamas, and Washington counties. TriMet was created in 1969 by the Oregon Legislature as a mass transit district and is governed by a board of seven directors appointed by the Governor. TriMet directly operates all transit service with the exception of its LIFT complementary paratransit service, which is operated by two contractors: First Transit and Broadway Cab. The population of TriMet’s service area is 1,489,796 persons.

TriMet’s transit services include fixed-route bus routes, the LIFT paratransit program, the MAX five light rail lines covering 61 miles, and the Westside Express Commuter Railroad (WES) on one line covering 15 miles. All transit service except for commuter rail operates seven days a week from 4:30 a.m. to 2:30 a.m.

On Sundays, from March through December, a vintage trolley service operates on the MAX light rail line between Lloyd Center and downtown Portland. This service is provided with two vehicles. TriMet also operates the Portland Streetcar, which runs on a loop from Northwest Portland through downtown to the South Waterfront. The streetcar was constructed by and is owned and maintained by the City of Portland.

TriMet’s bus service consists of 79 fixed routes serving approximately 6,800 bus stops and 17 transit centers where buses and trains meet. TriMet operates a fleet of 637 buses for fixed-route service. FTA funds have procured 586 of these vehicles. Its bus fleet consists of 30- and 40-foot standard and low-floor transit coaches. Bus maintenance is conducted at three bus maintenance facilities: 4400 SE 17th Avenue and 9800 SE Powell Blvd in Portland and 16130 SW Merlo Road in Beaverton, Oregon.

TriMet has a fleet of 240 accessible cutaway and small buses and 15 minivans that are operated by its contractors for ADA paratransit service. All of the buses are lift or ramp equipped. The LIFT fleet is supplemented by accessible taxi vans provided under contract. LIFT vehicles are maintained by contracted employees working at 2800 NW Nela Street, a TriMet-owned facility.

The light rail system is referred to as MAX, for Metropolitan Area Express. The 33-mile long east-to-west, Blue Line was opened in stages during 1986, 1997 and 1998. The 5.6-mile Airport Extension Project, the Red Line, opened for revenue service in September of 2001. The
5.8-mile Interstate Ave. Extension Project, the Yellow Line, opened for revenue service in May of 2004. The 8.3-mile I-205/Portland Mall Extension Project, the Green Line, opened for revenue service in September of 2009. The MAX light rail service is provided with 127 standard and low-floor light rail vehicles. Maintenance and storage of these rail cars is done at the Ruby Junction Rail Operations Facility in Gresham and the Elmonica Operations Facility in Beaverton.

The Westside Express Commuter Railroad (WES) began operations in February 2009. These operations are regulated by the Federal Railroad Administration. TriMet contracts with Portland & Western to operate the system and to maintain the right of way. WES is a 14.7 mile commuter rail line in Washington and Clackamas Counties. The northern terminus of the line is the Beaverton Transit Center, where commuter rail interfaces with light rail and buses. The line shares approximately 14.2 miles of railroad track with an existing freight railroad operation. The commuter rail line has five passenger stations that include approximately 800 park-and-ride spaces. Service is provide on weekdays from 5:20 a.m. to 10:00 a.m. and from 3:30 p.m. to 8:00 p.m. This operation is maintained and stored at the Wilsonville Commuter Rail Facility on Barber Street in Wilsonville.

The basic adult fare for fixed route bus service, MAX light rail, the Portland Streetcar, and the WES commuter railroad service is $2.10 for travel within one or between two of the three designated fare zones. When traveling through all zones, the fare is $2.40. A reduced fare of $1.00 is offered to passengers age 65 or older, persons with disabilities, and Medicare card holders. Students and youth ages 7-17 may ride in all zones for $1.50. The fare for LIFT paratransit service is $1.85. All trips on light rail within Fareless Square, which includes most of downtown Portland, are free. TriMet also offers multi-ride tickets and a variety of passes.

TriMet’s facilities include its administration building at 4012 SE 17th Avenue in Portland and the adjacent Center Bus Maintenance Facility; the Powell bus operations facility in Portland; the Merlo bus operations facility in Beaverton; the Ruby Junction rail operations facility in Gresham; the Elmonica rail operations facility in Beaverton; the WES facility in Wilsonville; and seventeen transit centers (major hubs served by several bus or MAX light rail lines) throughout the service area.

TriMet’s National Transit Database Report for FY2010 provided the following financial and operating statistics for its fixed-route and paratransit service:

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<thead>
<tr>
<th></th>
<th>Light Rail Service</th>
<th>Commuter Rail Service</th>
<th>Bus Fixed-Route Service</th>
<th>Paratransit Service</th>
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<tr>
<td>Unlinked Passengers</td>
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</tr>
</tbody>
</table>

Projects completed in the past three years include construction of the WES commuter rail line and commencement of operations and the I-205/Portland Mall Light Rail Project (the Green Line MAX). This project is an 8.3-mile light rail extension that includes 1.8 miles in downtown Portland and 6.5-mile extension along I-205 between Gateway and Clackamas Town Center. TriMet received a Full Funding Grant Agreement for the I-205/Portland Mall Light Rail Project
in June 2007; revenue service commenced September 2009. In addition to the light rail extensions along I-205 and on the Portland Mall, the project includes the procurement of 22 light rail vehicles and modifications to the existing maintenance facilities.

**Ongoing projects include:**

- **Portland Streetcar Loop Project**
  The project involves a 3.3-mile extension of the current streetcar alignment. The new alignment will extend the streetcar tracks, stations and service from the Pearl District in NW Portland, across the existing Broadway Bridge, serving the eastern half of the Portland Central City. The Portland Streetcar Loop Project will serve 18 new streetcar stations and station pairs, serving the Lloyd District, the Martin Luther King, Jr. Blvd-Grand Ave corridor on the Eastside, and key destinations such as the Oregon Convention Center, Rose Quarter, Oregon Museum of Science and Industry (OMSI), and Lower Broadway. The City of Portland will be responsible for the construction and operations of the Portland Streetcar Loop Project. FTA New Starts funding for this project is $75 million. The City of Portland has secured commitments for the remainder of the capital cost for the project.

- **Milwaukie Project**
  TriMet expects to enter into a Full Funding Grant Agreement with FTA in June 2012 or earlier. This project is expected to open in March 2016. Funding partners include FTA, Clackamas County, Metro, City of Milwaukie, Multnomah County, Oregon City, ODOT, City of Portland and the Portland Development Commission. This project totals $1.4 billion and will travel 7.3 miles; it received Final Design approval in March 2011. It will connect the Portland Central City and Portland State University with high density residential neighborhoods in South Auditorium area, River Place, and the South Waterfront. The South Waterfront is home to the new Oregon Health and Science University Schnitzer Medical School campus with approximately 4 million new square feet of office and treatment facilities. A new bridge across the Willamette River would provide access for light rail, buses, streetcar, bicycles, and pedestrians to the Portland Aerial Tram that provides a 90 second ride to 11,000 jobs on the Marquam Hill Campus and to the OMSI District on the east side of the Willamette River. The project would extend through SE Portland’s residential areas to the City of Milwaukie and will provide over 675 park and ride spaces.

Over the next three to five years, TriMet will be working on the following projects:

- **Columbia River Crossing Project:**
  The Columbia River Crossing Project is a bridge, transit, and highway project intended to improve mobility and safety in the I-5 corridor between Portland, Oregon and Vancouver, Washington. In partnership with C-TRAN, the transit agency in Clark County, Washington, TriMet will implement the Locally Preferred Alternative (LPA). Light rail will be extended from Portland's Expo Center MAX station to Clark College in Vancouver. This 2.9 mile extension will include one station on Hayden Island and four stations in Vancouver. The LPA was selected in 2008, the project approved for entry into Preliminary Engineering in December 2009, and the final EIS published in September 2011. Entry into Final Design is
scheduled for November 2012, and revenue operations are scheduled to begin in August 2019.

- **Portland to Lake Oswego Transit Project (LOPT):**
  LOPT would extend Streetcar service from Lowell Street in Portland to Lake Oswego in the existing Willamette Shore Line right-of-way. The project is in the pre-preliminary engineering phase at this point.

- **Southwest Corridor Project**
  This transit project will study transit alternatives and their potential impacts along Highway 99, which runs generally north to south between Portland and Tigard.

**ARRA Projects**

TriMet has been awarded five ARRA grants. Three of these grants have been closed. Projects funded by these grants that are completed, underway, or planned follow:

- Bike Parking Improvements
- Bus Street Maintenance Projects
- Cross-Mall Transit Tracker
- Elmonica Maintenance Facility Roof Replacement
- Fencing along the I-205 Light Rail Alignment
- Foster Road Layover Concrete Bus Pads
- Gresham Central and 82nd Avenue Platform Access Control and Illumination Project
- Ice Cap Installation on the I-205 Light Rail Catenary System
- Intersection Repairs along Morrison/Yamhill
- IT Server Room Climate Control System
- Lighting along the Multi-Use Path adjacent to the I-205 Light Rail Alignment
- Merlo Fuel/Wash & LIFT Buildings
- Milwaukie Park & Ride
- Pedestrian Crossing Improvements
- Preventive Maintenance
- Rail Track and Structure Repairs
- Repainting Eastside Light Rail Stations
- Replacement of broken Concrete at the Center Street Bus Facility
- Replacement of Broken Concrete at the Merlo Bus Yard
- South Mall Light Rail Terminus Alternative Energy Project
- Southeast Transit Police Precinct at Clackamas Town Center Garage
- Tactile Paver Repair/Replacement at Five Stations
- Tigard Transit Center Storm Piping Repair
- Track Switch Heaters on I-205 Alignment
- Track Switch Heaters on Light Rail Alignments
- Transit Tracker Installation at I-205 MAX Stations
- Underground Storage Tank Replacement at Center Garage
• Wayside Horns—Tualatin RR crossings
• Eight Light Rail Cars
• Diesel Cooling System Retrofit on 39 fixed-route buses
• Portland Streetcar Signals.

IV. RESULTS OF THE REVIEW

The Triennial Review focused on TriMet’s compliance in 24 areas. This section provides a discussion of the basic requirements and findings in each area. Deficiencies were found Maintenance. No deficiencies were related to ARRA grants. None of the deficiencies are repeated from the last review.

1. Legal

Basic Requirement: The grantee must be eligible and authorized under state and local law to request, receive, and dispense FTA funds and to execute and administer FTA funded projects. The authority to take actions and responsibility on behalf of the grantee must be properly delegated and executed.

Finding: During this Triennial Review of TriMet, no deficiencies were found with the FTA requirements for legal.

2. Financial

Basic Requirement: The grantee must demonstrate the ability to match and manage FTA grant funds, cover cost increases and operating deficits, financially maintain and operate FTA funded facilities and equipment, and conduct and respond to applicable audits.

Finding: During this Triennial Review of TriMet, no deficiencies were found with the FTA requirements for financial.

3. Technical

Basic Requirement: The grantee must be able to implement the FTA-funded projects in accordance with the grant application, Master Agreement, and all applicable laws and regulations, using sound management practices.

Finding: During this Triennial Review of TriMet, no deficiencies were found with the FTA requirements for technical.
4. **Satisfactory Continuing Control**

**Basic Requirement:** The grantee must maintain control over real property, facilities, and equipment and ensure that they are used in transit service.

**Finding:** During this Triennial Review of TriMet, no deficiencies were found with the FTA requirements for satisfactory continuing control.

5. **Maintenance**

**Basic Requirement:** Grantees and their subrecipients must keep Federally funded equipment and facilities in good operating order and maintain ADA accessibility features.

**Findings:** During this Triennial Review of TriMet, deficiencies were found with the FTA requirements for maintenance.

TriMet has a written maintenance plan for its FTA-funded fixed route buses. However the basic preventive maintenance interval in the plan of 7,000 miles is above the manufacturer’s recommended interval of 6,000 miles. The plan does not discuss why the basic preventive maintenance interval is higher. At the site visit, no documentation was provided justifying the application of the higher maintenance interval.

It should be noted that TriMet is maintaining some buses that are still under warranty and are being maintained with the higher preventive maintenance interval than the manufacturer’s recommended interval. This practice runs the risk of invalidating vehicle warranty provisions. At the site visit, no documentation was provided from the manufacturer of the vehicles’ engines stating that this practice will not void the engine warranty.

A review of the preventive maintenance records for TriMet’s light rail vehicles found that it has not been maintaining vehicles according to its basic preventive maintenance interval standard of 4,500 miles for its Type 2 and 3 vehicles and 9,000 miles for its Type 4 vehicles. The preventive maintenance intervals reviewed for light rail vehicles were done on schedule only 18 percent of the time.

**Corrective Actions and Schedule:** By January 30, 2012, submit to FTA Region 10 Office a revised written vehicle maintenance plan that fully addresses preventive maintenance intervals and why its basic preventive maintenance interval of 7,000 miles is higher than the manufacturer’s recommended interval of 6,000 miles.

By January 30, 2012, submit to FTA Region 10 Office procedures for completing preventive maintenance inspections for its light rail vehicles on time. Submit a report signed by the chief executive officer on its results monthly until the data demonstrate it has conducted at least 80 percent of its preventive maintenance on time for three consecutive months. For each light rail vehicle that received a preventive maintenance inspection during the month, include with the submittal a report that lists the vehicle number, date of the inspection, mileage of the current inspection, mileage of the previous inspection, and the mileage interval between the two
inspections. List the percentage of the inspections performed on time. Submit back-up
documentation for each vehicle (e.g., copy of work order, printout from the maintenance
management system) documenting the date and mileage of the inspection.

6. Procurement

Basic Requirement: FTA grantees use their own procurement procedures that reflect
applicable state and local laws and regulations, provided that the process ensures competitive
procurement and the procedures conform to applicable Federal law, including 49 CFR Part 18
(specifically Section 18.36) and FTA Circular 4220.1F, “Third Party Contracting Guidance.”

Finding: During this Triennial Review of TriMet, no deficiencies were found with the
FTA requirements for procurement.

7. Disadvantaged Business Enterprise (DBE)

Basic Requirement: The grantee must comply with 49 CFR Part 26 to ensure
nondiscrimination in the award and administration of DOT-assisted contracts. Grantees also
must create a level playing field on which DBEs can compete fairly for DOT-assisted contracts.

Finding: During this Triennial Review of TriMet, no deficiencies were found with
USDOT requirements for DBE.

8. Buy America

Basic Requirement: Federal funds may not be obligated unless steel, iron, and
manufactured products used in FTA funded projects are produced in the United States. Grantees
must conduct pre-award and post-delivery audits of purchases of revenue rolling stock in order to
verify that Buy America provisions, Federal Motor Vehicle Safety Standards, and purchaser’s
requirements are met.

Finding: During this Triennial Review of TriMet, no deficiencies were found with the
FTA requirements for Buy America.

9. Debarment and Suspension

Basic Requirement: Debarment and suspension are tools used to protect the public from
fraud, waste, and abuse in Federal transactions. Grantees and subgrantees must not make any
award or permit any award (subgrant or contract) at any tier to any party that is debarred or
suspended or is otherwise excluded from or ineligible for participation in Federal assistance
programs.

Finding: During this Triennial Review of TriMet, no deficiencies were found with the
FTA requirements for debarment and suspension.
10. Lobbying

**Basic Requirement:** Recipients of Federal grants and contracts exceeding $100,000 must certify compliance with Restrictions on Lobbying before they can receive funds.

**Finding:** During this Triennial Review of TriMet, no deficiencies were found with the FTA requirements for lobbying.

11. Planning/Program of Projects

**Basic Requirement:** The grantee must participate in the transportation planning process in accordance with FTA requirements, SAFETEA-LU, and the metropolitan and statewide planning regulations.

Grantees must develop and/or participate in a locally developed, coordinated public transit-human services transportation plan that identifies the transportation needs of individuals with disabilities, older adults, and people with low incomes, provides strategies for meeting those local needs, and prioritizes transportation services for funding and implementation.

Each recipient of a Section 5307 grant shall have complied with the public participation requirements of Section 5307(c)(1) through (7). Each grantee is required to develop, publish, afford an opportunity for a public hearing on, and submit for approval a Program of Projects (POP).

**Finding:** During this Triennial Review of TriMet, no deficiencies were found with the FTA requirements for planning/POP.

12. Title VI

**Basic Requirement:** The grantee must ensure that no person in the United States shall, on the grounds of race, color, or national origin, be excluded from participating in, be denied the benefits of, or be subject to discrimination under any program or activity receiving Federal financial assistance. The grantee must ensure that Federally supported transit services and related benefits are distributed in an equitable manner.

**Finding:** During this Triennial Review of TriMet, no deficiencies were found with the FTA requirements for Title VI.

13. Public Comment on Fare and Service Changes

**Basic Requirement:** Section 5307 grantees are expected to have a written locally developed process for soliciting and considering public comment before raising a fare or carrying out a major transportation service reduction.
Finding: During this Triennial Review of TriMet, no deficiencies were found with the FTA requirements for fare increases and service reductions.

14. Half Fare

Basic Requirement: During non-peak hours for fixed route service supported with Section 5307 assistance, fares charged elderly persons, persons with disabilities or an individual presenting a Medicare card will not be more than half the peak hour fare.

Finding: During this Triennial Review of TriMet, no deficiencies were found with the FTA requirements for half fare.

15. ADA

Basic Requirement: Titles II and III of the Americans with Disabilities Act of 1990 provide that no entity shall discriminate against an individual with a disability in connection with the provision of transportation service. The law sets forth specific requirements for vehicle and facility accessibility and the provision of service, including complementary paratransit service.

Finding: During this Triennial Review of TriMet, no deficiencies were found with the FTA requirements for ADA.

16. Charter Bus

Basic Requirement: FTA grantees are prohibited from using Federally funded equipment and facilities to provide charter service if a registered private charter operator expresses interest in providing the service. Grantees are allowed to operate community based charter services excepted under the regulations.

Finding: During this Triennial Review of TriMet, no deficiencies were found with the FTA requirements for charter bus.

17. School Bus

Basic Requirement: Grantees are prohibited from providing exclusive school bus service unless the service qualifies and is approved by the FTA Administrator under an allowable exemption. Federally funded equipment or facilities cannot be used to provide exclusive school bus service. School tripper service that operates and looks like all other regular service is allowed.

Finding: During this Triennial Review of TriMet, no deficiencies were found with the FTA requirements for school bus.
18. National Transit Database (NTD)

Basic Requirement: Grantees that receive 5307 and 5311 grant funds must collect, record, and report financial and non-financial data in accordance with the Uniform System of Accounts (USOA) and the National Transit Database (NTD) Reporting Manual as required by 49 USC 5335(a).

Finding: During this Triennial Review of TriMet, no deficiencies were found with the FTA requirements for National Transit Database.

19. Safety and Security

Basic Requirement: Under the safety authority provisions of the Federal transit laws, the Secretary has the authority to investigate the operations of the grantee for any conditions that appear to create a serious hazard of death or injury, especially to patrons of the transit service.

As recipients of Urbanized Area Formula Grant Program funds, grantees must annually certify that they are spending at least one percent of such funds for transit security projects or that such expenditures for security systems are not necessary.

FTA and the Department of Homeland Security's (DHS) Transportation Security Administration (TSA) have developed a list of 17 Security and Emergency Management Action Items for Transit Agencies. The action items aim to elevate security readiness throughout the public transportation industry by establishing baseline measures that transit agencies should employ.

The goal of FTA’s Safety and Security Program is to achieve the highest practical level of safety and security in all modes of transit. To this end, FTA continuously promotes the awareness of safety and security throughout the transit community by establishing programs to collect and disseminate information on safety/security concepts and practices. In addition, FTA develops guidelines that transit systems can apply in the design of their procedures and by which to compare local actions. Many of the questions in this review area are designed to determine what efforts grantees have made to develop and implement safety, security, and emergency management plans. While there may not be specific requirements associated with all of the questions, grantees are encouraged to implement the plans, procedures, and programs referenced in these questions. For this reason, findings in this area will most often result in advisory comments rather than deficiencies.

Finding: A summary of TriMet’s expenditures of Section 5307 funds for security projects is provided in Section VI of this report.

During this Triennial Review of TriMet, no deficiencies were found with the FTA requirements for safety and security.
20. Drug-Free Workplace

**Basic Requirement:** FTA grantees are required to maintain a drug-free workplace for all employees and to have an ongoing drug-free awareness program.

**Finding:** During this Triennial Review of TriMet, no deficiencies were found with the FTA requirements for drug-free workplace.

21. Drug and Alcohol Program

**Basic Requirement:** Grantees receiving Urbanized Area Formula Program (Section 5307), Non-Urbanized Area Formula Program (Section 5311), or Capital Investment Program (Section 5309) funds must have a drug and alcohol testing program in place for all safety-sensitive employees.

**Finding:** During this Triennial Review of TriMet, no deficiencies were found with the FTA requirements for the drug and alcohol program.

22. Equal Employment Opportunity (EEO)

**Basic Requirement:** The grantee must ensure that no person in the United States shall on the grounds of race, color, religion, national origin, sex, age, or disability be excluded from participating in, or denied the benefits of, or be subject to discrimination in employment under any project, program, or activity receiving Federal financial assistance under the Federal transit laws. (Note: EEOC’s regulation only identifies/recognizes religion and not creed as one of the protected groups.)

**Finding:** During this Triennial Review of TriMet, no deficiencies were found with the FTA requirements for EEO.

23. ITS Architecture

**Basic Requirement:** Intelligent Transportation Systems (ITS) projects funded by the Highway Trust Fund and the Mass Transit Account must conform to the National ITS Architecture, as well as to United States Department of Transportation adopted ITS Standards.

**Finding:** During this Triennial Review of TriMet, no deficiencies were found with the FTA requirements for ITS architecture.


**Basic Requirement:** Grantees must have the legal, financial and technical capacity to carry out the proposed program of projects and meet the additional reporting requirements for its ARRA-funded grant activities.
Finding: TriMet has been awarded five ARRA grants. Three of these grants have been closed. Projects funded by these grants that are completed, underway, or planned follow:

- Bike Parking Improvements
- Bus Street Maintenance Projects
- Cross-Mall Transit Tracker
- Elmonica Maintenance Facility Roof Replacement
- Fencing along the I-205 Light Rail Alignment
- Foster Road Layover Concrete Bus Pads
- Gresham Central and 82nd Avenue Platform Access Control and Illumination Project
- Ice Cap Installation on the I-205 Light Rail Catenary System
- Intersection Repairs along Morrison/Yamhill
- IT Server Room Climate Control System
- Lighting along the Multi-Use Path adjacent to the I-205 Light Rail Alignment
- Merlo Fuel/Wash & LIFT Buildings
- Milwaukie Park & Ride
- Pedestrian Crossing Improvements
- Preventive Maintenance
- Rail Track and Structure Repairs
- Repainting Eastside Light Rail Stations
- Replacement of broken Concrete at the Center Street Bus Facility
- Replacement of Broken Concrete at the Merlo Bus Yard
- South Mall Light Rail Terminus Alternative Energy Project
- Southeast Transit Police Precinct at Clackamas Town Center Garage
- Tactile Paver Repair/Replacement at Five Stations
- Tigard Transit Center Storm Piping Repair
- Track Switch Heaters on I-205 Alignment
- Track Switch Heaters on Light Rail Alignments
- Transit Tracker Installation at I-205 MAX Stations
- Underground Storage Tank Replacement at Center Garage
- Wayside Horns—Tualatin RR crossings
- Eight Light Rail Cars
- Diesel Cooling System Retrofit on 39 fixed-route buses
- Portland Streetcar Signals.

During this Triennial Review of TriMet, no deficiencies were found with the FTA requirements for ARRA.
V. SUMMARY OF FINDINGS AND CORRECTIVE ACTIONS

<table>
<thead>
<tr>
<th>Review Area</th>
<th>Finding</th>
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<th>Corrective Action</th>
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<tr>
<td>4. Satisfactory Continuing Control</td>
<td>ND</td>
<td></td>
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<tr>
<td>5. Maintenance</td>
<td>D-02</td>
<td>Vehicle maintenance plan incomplete or out of date</td>
<td>Submit a revised written vehicle maintenance plan that fully addresses preventive maintenance intervals and why its basic preventive maintenance interval of 7,000 miles is higher than the manufacturer's recommended interval of 6,000 miles.</td>
<td>1/30/12</td>
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<tr>
<td></td>
<td>D-03</td>
<td>Vehicle maintenance plan not meeting manufacturer's recommendations</td>
<td></td>
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<td></td>
<td>D-04</td>
<td>Late vehicle preventive maintenance</td>
<td>Submit procedures for completing preventive maintenance inspections for its light rail vehicles on time. Submit a report signed by the chief executive officer on its results monthly until the data demonstrate it has conducted at least 80 percent of its preventive maintenance on time for three consecutive months. For each light rail vehicle that received a preventive maintenance inspection during the month, include with the submittal a report that lists the vehicle number, date of the inspection, mileage of the current inspection, mileage of the previous inspection, and the mileage interval between the two inspections. List the percentage of the inspections performed on time. Submit back-up documentation for each vehicle (e.g., copy of work order, printout from the maintenance management system) documenting the date and mileage of the inspection.</td>
<td>1/30/12</td>
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<tr>
<td>6. Procurement</td>
<td>ND</td>
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<td>7. Disadvantaged Business Enterprise</td>
<td>ND</td>
<td></td>
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<tr>
<td>8. Buy America</td>
<td>ND</td>
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<tr>
<td>9. Debarment and Suspension</td>
<td>ND</td>
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<tr>
<td>Review Area</td>
<td>Finding</td>
<td>Deficiency</td>
<td>Corrective Action</td>
<td>Response Date</td>
<td>Date Closed</td>
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<td>10. Lobbying</td>
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<td>11. Planning/POP</td>
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<td>12. Title VI</td>
<td>ND</td>
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<td>13. Public Comment on Fare and Service Changes</td>
<td>ND</td>
<td>ND</td>
<td></td>
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<td>14. Half Fare</td>
<td>ND</td>
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<td>15. ADA</td>
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<td>16. Charter Bus</td>
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<td>17. School Bus</td>
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<td>18. National Transit Database</td>
<td>ND</td>
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<td>19. Safety and Security</td>
<td>ND</td>
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<td>20. Drug-Free Workplace</td>
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<td>21. Drug and Alcohol Program</td>
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<td>22. Equal Employment Opportunity</td>
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<td>23. ITS Architecture</td>
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<td>24. ARRA</td>
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Findings: ND = No Deficiencies; D = Deficient; AC = Advisory Comment; NA = Not Applicable
VI. TRANSIT SECURITY EXPENDITURES

Does the grantee expend one percent or more of its Section 5307 Urbanized Area Formula Grant funds for transit security?

<table>
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<tr>
<th></th>
<th>FY2008</th>
<th>FY2009</th>
<th>FY2010</th>
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</thead>
<tbody>
<tr>
<td>Yes:</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>No:</td>
<td>x</td>
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</table>

If no, why does the grantee consider such expenditure unnecessary (check all that apply):

- No deficiency found from a threat and vulnerability assessment
- TSA/FTA Security and Emergency Management Action Items met or exceeded
- Other (please describe): TriMet spends sufficient local, other FTA, and Department of Homeland Security (DHS) funds on security projects that exceed the 1% expenditure.

<table>
<thead>
<tr>
<th>Security Funding</th>
<th>FTA Section 5307 Funds</th>
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<tbody>
<tr>
<td></td>
<td>FY 2008</td>
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<tr>
<td>Total amount of 5307 funds expended</td>
<td>$31,419,385</td>
</tr>
<tr>
<td>Amount of 5307 funds expended on security</td>
<td>0</td>
</tr>
<tr>
<td>Percent of 5307 funds expended on security</td>
<td>0%</td>
</tr>
</tbody>
</table>

Infrastructure/Capital Improvement Security Projects:
- Lighting, fencing & perimeter control
- CCTV and surveillance technology
- Communications systems
- Security planning
- Drills & tabletop exercises
- Employee security training
- Other security-related infrastructure & capital improvements (please list)

Operating/Personnel Expenditures (for agencies in areas with populations under 200,000):
- Contracted security force
- In-house security force
- Other security-related operating expenditures (please list)
## VII. ATTENDEES

<table>
<thead>
<tr>
<th>Name</th>
<th>Title/Organization</th>
<th>Phone Number</th>
<th>E-mail Address</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>TriMet</strong></td>
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<td></td>
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<td>Martinez</td>
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<tr>
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</tr>
<tr>
<td>Name</td>
<td>Title/Organization</td>
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<td>E-mail Address</td>
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<tr>
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<tr>
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<td>Ken Feldman</td>
<td>Director of Program Management and Oversight</td>
<td>206-220-7521</td>
<td><a href="mailto:Kenneth.Feldman@dot.gov">Kenneth.Feldman@dot.gov</a></td>
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<tr>
<td><strong>CDI/DCI</strong></td>
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<tr>
<td>John Caruolo</td>
<td>Lead Reviewer</td>
<td>610-983-3694</td>
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<tr>
<td>Janet Kraus</td>
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<td><a href="mailto:JanetKrausTR@gmail.com">JanetKrausTR@gmail.com</a></td>
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