



Equity Analysis: Powell LIFT Facility Relocation

FINAL

April 13, 2016

I. Background

TriMet's LIFT paratransit service is a shared-ride public transportation service for people who are unable to use regular buses or trains due to a disability or disabling health condition. TriMet's LIFT service meets and exceeds the requirements of the Americans with Disabilities Act (ADA), and provides approximately one million trips per year to eligible riders.

Currently, LIFT operates out of three geographically distinct locations in Beaverton, NW Portland, and SE Portland. In order to meet increased need for bus maintenance and service due to a growing bus fleet, the SE Portland LIFT facility, currently located at the Powell Bus Garage on SE 92nd Ave and Powell, needs to be relocated. This report documents the site selection process and analysis of potential equity impacts related to this relocation.

II. Project Description

TriMet's current east Portland LIFT facility is about 2.5 acres and contains parking for about 100 LIFT vehicles, as well as a small dispatch building and employee parking. Therefore, the new location needs to be at least this size, and ideally slightly larger to accommodate expected increases in LIFT service over the next several years. Due to the aforementioned need for space to accommodate the expanding TriMet bus fleet at the Powell Bus Garage, a new LIFT facility must be completed by spring 2018. This requires selection of a site in spring 2016.

III. Title VI Compliance

TriMet has determined that relocating the LIFT facility to another location falls under the provisions in Chapter III-13 of FTA Circular 4702.1B:

13. DETERMINATION OF SITE OR LOCATION OF FACILITIES. 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." For purposes of this requirement, "facilities" does not include bus shelters, as these are transit amenities and are covered in Chapter IV, nor does it include transit stations, power substations, etc., as those are evaluated during project development and the NEPA process. Facilities included in this provision include, but are not limited to, storage facilities, maintenance facilities, operations centers, etc.

Therefore, TriMet is required to conduct a Title VI equity analysis to ensure the location is selected without regard to race, color, or national origin. Per the guidance in the FTA Circular, this analysis must:

- Include outreach to persons potentially impacted by the siting of the facility;
- Compare impacts of various siting alternatives;
- Determine if cumulative adverse impacts might result due to the presence of other facilities with similar impacts in the area; and
- Occur before the selection of the preferred site.

If disparate impacts are identified, the least discriminatory alternative must be implemented.

IV. Site Selection Process

The new LIFT facility location must meet several important criteria, including adequate size, geographic proximity to the service area, and access to major thoroughfares, including the I-205 freeway. TriMet's Accessible Transportation Program (ATP) department studied potential geographic locations, and provided a geographic overlay that would continue to provide maximum service levels while minimizing additional service time and fuel costs that could come from moving the LIFT facility to a location more remote from its service area (see Figure 1). The geographic overlay provided by the ATP department consisted of both *optimal* and *potentially acceptable* locations.

Based on this information, TriMet's Real Property group conducted the LIFT replacement site search. Staff searched property listings for sites currently for sale, used computer search programs to find sites in the necessary geographic area that would meet the criteria but were not for sale, searched sites currently owned by TriMet, and also visited several sites to determine their potential for this use. The search was extensive, and TriMet is confident it analyzed all locations in both the optimal and potentially acceptable geographic area that could meet the required criteria for the new LIFT site.

This process led to staff identifying twelve sites as potential locations. Five of these sites were owned by TriMet, and seven were owned by private parties. Five of the overall twelve sites fell in the *optimal* location category, and one into the *potentially acceptable* location category (see Figure 1).

After comparing these sites to the required selection criteria, TriMet selected the site at the Powell Park & Ride (Site 11 on Figure 1) and the site at the Fuller Park & Ride (Site 13 on Figure 1) for further analysis. Going forward this document will refer to these sites as:

Site 1: Powell Park & Ride

Site 2: Fuller Park & Ride

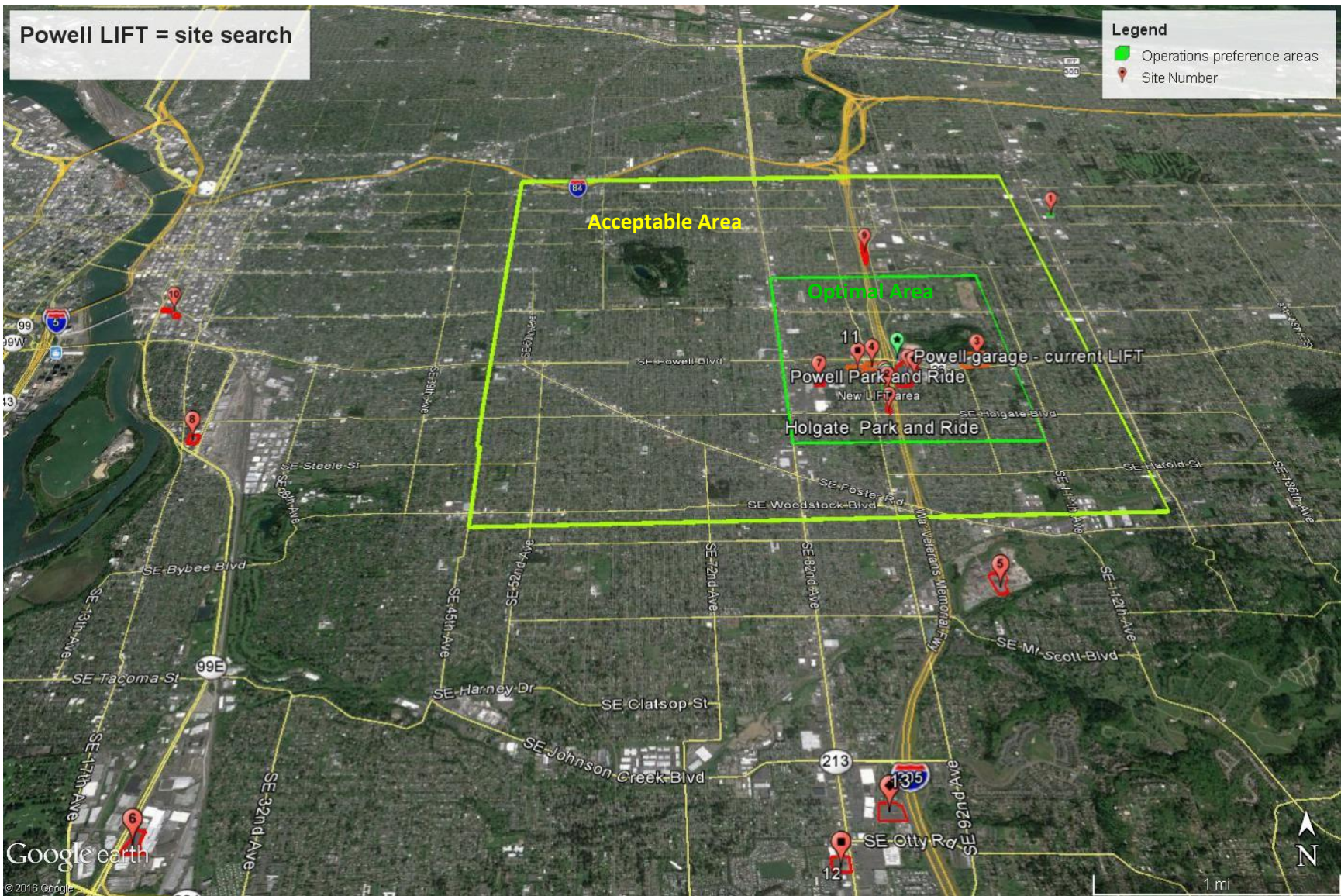


Figure 1: Potential LIFT facility sites identified by ATP department

V. Alternatives Equity Analysis

While the siting criteria was used to narrow the candidates down to Sites 1 and 2, TriMet analyzed area demographics to ensure that this did not result in disparate treatment on the basis of race, color, or national origin. As shown in Table 1 and Figure 2, the current facility is located in a block group that is 49% minority – above the TriMet district average of 28%¹. Site 1 is in a block group that is less populated and has a similar minority population of 52%. The block group surrounding Site 2 has the smallest population, but the highest concentration of minorities at 68%.

TriMet also compared the sites across three additional factors for the purpose of evaluating the relative equity impacts: who would be impacted by each respective site selection; whether either would require displacement of residents or businesses; and any cumulative impacts from the presence of similar facilities in the area. The results are shown in Table 1.

| | Current Location (Powell Garage) | Site 1 (Powell Park & Ride) | Site 2 (Fuller Park & Ride) |
|--|---|--|---|
| Minority Population of surrounding Census Block Group ➤ <i>District avg: 28%</i> | - Number: 2,596 - Percentage: 49% | - Number: 1,711 - Percentage: 52% | - Number: 832 - Percentage: 68% |
| Who would be impacted by selecting this site? | N/A | - Park & Ride users (Minimal impact: site is under-utilized) - Adjacent neighbors (Minimal impact: berm separates site from nearby properties – see Appendix B) | - Park & Ride users (Minimal impact: site is under-utilized) - Adjacent neighbors (Minimal impact) - LIFT customers (Minimal to moderate impact: potential service delivery concerns) |
| Will selecting this site require displacement of residents or businesses? | N/A | No | No |
| List other similar facilities nearby. Includes maintenance, storage, operations, etc. | - Powell Bus Garage - RV sales lot - Amusement park storage | - ODOT construction maintenance facility - Fast food restaurants with parking - Bowling alley with parking | - Fiberglass manufacturing plant - Big box retail with parking - RV storage lot |

¹ Source for all demographic information is the 2010-2014 5-year American Community Survey

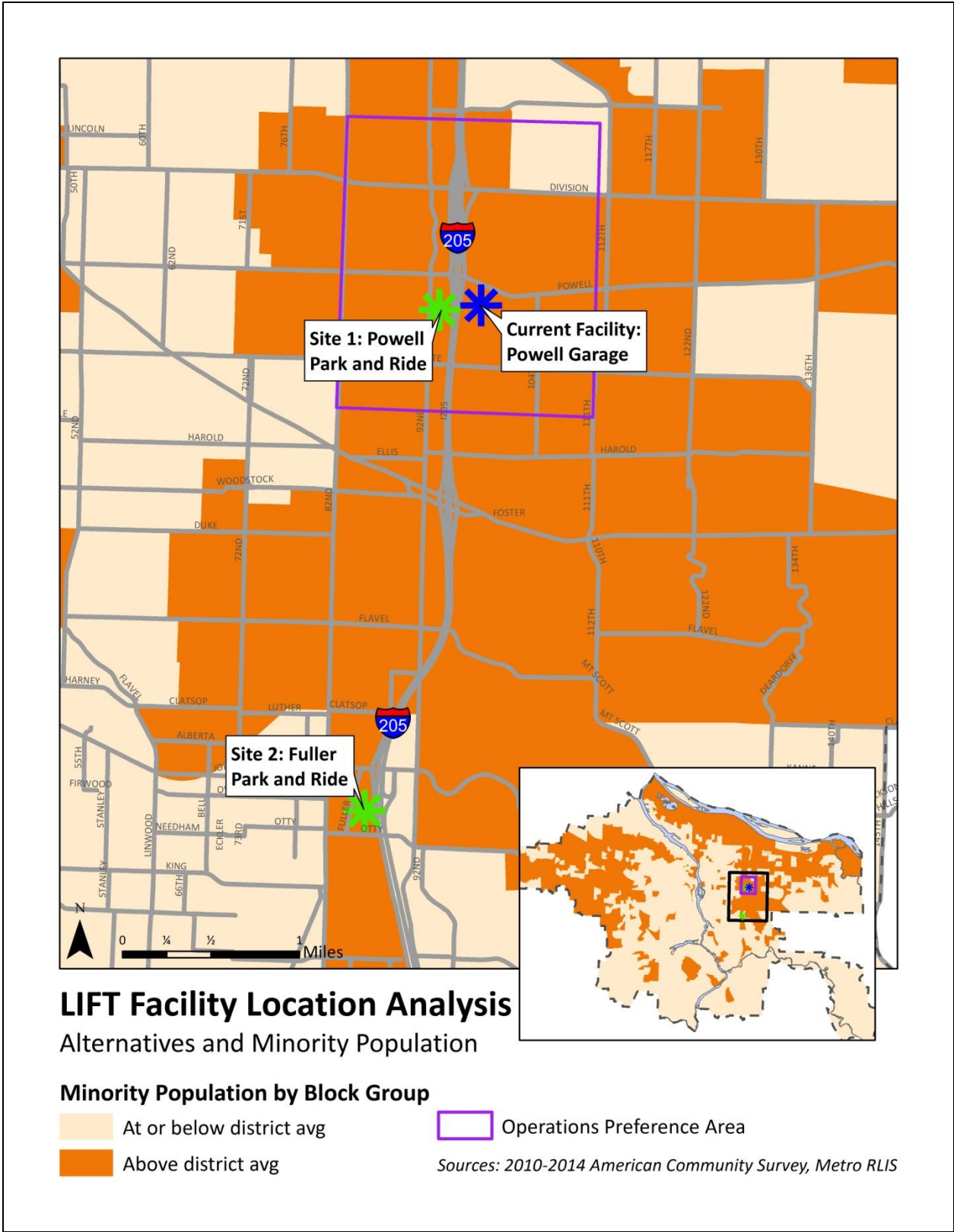


Figure 2: Potential LIFT facility sites and minority population

The LIFT facility is expected to have minimal community impacts, whichever site is selected. Both Park & Ride lots are currently well under-utilized and would retain enough parking spaces to far exceed current and projected demand. Neighbors and Park & Ride users would likely see increased traffic over current usage rates due to LIFT vehicles leaving and entering the area, but the vehicle capacities of either lot would actually be reduced after the addition of the LIFT facility.

Specifically, Site 1 would contain:

- 125 LIFT vehicle parking spaces
- 83 Park & Ride spaces
- 52 employee parking spaces
- 260 total spaces (Compared to 391 existing Park & Ride spaces)

Site 2 would contain:

- 125 LIFT vehicle parking spaces
- 302 Park & Ride spaces
- 52 employee parking spaces
- 479 total spaces (compared to 610 existing Park & Ride spaces)

Neither Site 1 nor Site 2 would require displacement of residents or business for conversion to the LIFT facility because they would both use land already controlled and maintained by TriMet.

In terms of potential cumulative impacts, Site 1 has an adjacent facility occupied by the Oregon Department of Transportation utilized by maintenance and construction vehicles, as well as several fast food restaurants and a bowling alley with large surface parking lots. Site 2 abuts a fiberglass manufacturing plant and an RV storage lot, and has several big box retailers with large surface parking lots in close proximity.

Given these considerations, selection of either Site 1 or Site 2 does not present any apparent disparate impacts. While the areas around both have high minority populations for the TriMet District, the impacts of the site itself are expected to be minimal, regardless of which is selected. The expected traffic increases due to the LIFT vehicles accessing either site are consistent with their intended use as Park & Ride lots.

What differs between the sites, however, is the implication for LIFT operations. Site 1 is within the ATP department's *optimal* area because it is directly across the freeway from the current facility. Selection of Site 2, on the other hand, would increase travel times to reach many LIFT customers in the area as it is not as centrally located. An increase in travel times would lead to increased costs and potential environmental impacts, as well as service concerns.

Thus, TriMet has selected Site 1 as the preferred location for the LIFT facility.

VI. Community Outreach

After identifying Site 1 as the preferred site for the relocated LIFT facility, TriMet engaged the potentially impacted community in the following ways:

- Communication with Lents Neighborhood Association to inform of the potential change in use and solicit feedback.
 - A representative of the neighborhood association shared concerns about potential increase in traffic volumes on SE 92nd Ave and the Park & Ride access road. TriMet responded saying that the traffic generated by the combined LIFT use and smaller Park & Ride is not expected to be any greater than that generated by the larger Park & Ride that was originally studied and built with the MAX Green Line. The traffic study conducted for the original Powell Park & Ride recommended the improvements that are now in place at the access road/multi-use path and 92nd Ave/91st Pl intersections.
- Direct mailings to the potentially impacted community, including all adjacent properties and all nearby properties with frontage on SE 92nd Avenue. The notice, inviting recipients to call or email TriMet with questions or comments, was mailed to approximately 125 neighbors (map shown as Appendix B).
 - TriMet did not receive any response to these mailings.
- Notice posted at Site 1 (the Powell Park & Ride) regarding potential change in use of site.
 - One neighbor of the Powell Bus Garage (the location of the current LIFT facility) reported concerns with regard to the long term plans for the Powell Bus Garage, but did not have concerns about the LIFT facility relocation to the Powell Park & Ride.

VII. Conclusion

This equity analysis has aimed to guide TriMet on selecting a LIFT facility location that does not result in disparate impacts on the basis of race, color, or national origin. The process by which TriMet identified and narrowed down potential sites for the facility was based on property size, geographic proximity to the service area, and transportation access. Given this, the analysis of potential equity impacts, and the community outreach, constructing the new LIFT facility at the Powell Park & Ride does not present any apparent disparate impacts.

Appendix A: Photograph of Powell Park & Ride



Powell Park & Ride (facing south) – Berm separating site from adjacent multiuse path and residences

Appendix B: Map of properties receiving March 2016 mailing

