



2016 Title VI Program Update



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

Dear Reader,

Transit has been at the forefront of one of the most important revolutions of our country's history – the push for civil rights.

From the opposition to segregated rail cars in the late 19th Century to Rosa Parks refusing to give up her seat on the bus and sparking the 1955 Montgomery Bus Boycott, the fight against discrimination and segregation has been a fight for equal access to services and opportunity.

That such key events in the push for civil rights occurred on a bus and a train reminds us that transit is not only a connection to destinations, but to opportunity. People of color and those with low-income are more often transit dependent than others. That's why we're dedicated to do all we can to make our transit system a place where we all can ride without experiencing discrimination. It's equally as important to help those individuals move out of poverty and in to prosperity by connecting to jobs, schools and other community services.

Our Title VI policies are meant to ensure that we pay close attention to the impacts on minority and low-income riders when we make decisions about service and the cost of fares. During economic downturns in the past, we've had to make tough choices about reducing bus and MAX service and raising fares. Likewise, in more prosperous times (such as now) we aim to improve service in such a way that minority and low-income riders experience the benefits that come from improvements.

Our region is growing in both population and diversity. Part of embracing this growing diversity means that we provide service equitably, and Title VI is one way we ensure that we deliver.

We proudly use equity as a lens to help guide our decisions on growing our system that benefit all, but especially those who are transit dependent.

Welcome aboard, everyone!

Neil McFarlane
TriMet General Manager



Table of Contents

Introduction	1
What is Title VI?	1
What does this mean for TriMet?	2
TriMet’s Commitment to Equity	2
Definitions.....	3
Part I: General Requirements.....	7
Title VI Notice and Complaint Procedures	7
Title VI Investigations, Complaints, and Lawsuits	11
Public Participation Plan	13
Language Assistance Plan	21
Subrecipient Monitoring.....	27
Board Membership and Recruitment.....	29
Facilities Siting and Construction	30
Major Service and Fare Change Equity Analyses	32
Part II: Title VI Policies	33
Major Service Change Policy.....	33
Disparate Impact Policy	34
Disproportionate Burden Policy.....	37
Part III: System-Wide Service Policies and Standards	42
Standard – Vehicle Loads.....	43
Standard – Service Frequency	43
Standard - On-Time Performance	44
Standard – Service Availability	45
Amenity Placement Guidelines.....	45
Light Rail (“MAX”) Station Design.....	46
Commuter Rail (“WES”) Design	46
Customer Information	46
Vehicle Assignment	48
Part IV: Service Monitoring.....	50
1. Minority & Non-minority Lines	50
2. Service Frequency & Span	50
3.On-time Performance.....	55
4.Vehicle Loads	56

5.Service Availability	58
6.Stop Amenities	60
7.Vehicle Assignment.....	60
Summary.....	61
Part V: Demographic Analysis.....	63
Current Service and Service Area.....	63
Proximity to Service	68
Ridership Characteristics and Demographics (trip based).....	70
Facilities	78

Introduction

WHAT IS TITLE VI?

The United States has a long history of unjust treatment towards people of color. Although we have come a long way over the past few centuries, we still see disparities throughout our society along the lines of race and ethnicity – even in cases where decisions are made with the best of intentions.

The Civil Rights Movement of the mid-1950's and 60's brought the issues of segregation and racial injustice to the forefront of our national consciousness. The movement resulted in the historic passage of the Civil Rights Act of 1964, which included eleven "Titles" outlawing several types of race-based discrimination. One of these "Titles" – Title VI – included the following provision:

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 intent of Title VI is to remove barriers and conditions that prevent minority, low-income, and persons with limited English proficiency (LEP) from equal access to public goods and services. In effect, Title VI promotes fairness and equity in federally assisted programs and activities. Title VI is rooted in the Constitutional guarantee that all human beings are entitled to equal protection of the law, and specifically addresses involvement of impacted persons in the decision-making process.

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 program¹, 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

¹ 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.

- Segregate or separately treat individuals in any matter related to the receipt of any service, aid, or benefit.

About TriMet

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 LIFT paratransit public transportation service in the Portland metropolitan area, providing about 100 million rides each year. Guided by a Board of Directors representing seven sub-districts, the organization is directed by a General Manager appointed by the Board and employs about 2,800 union and non-union employees.

WHAT DOES THIS MEAN FOR TRIMET?

The policies, practices, and analysis provided in this document illustrate how the Tri-County Metropolitan Transportation District of

Oregon (TriMet) ensures compliance with Title VI. As a recipient of federal financial assistance through the Federal Transit Administration (FTA), TriMet is subject to the rules and regulations provided through FTA 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’s 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.

TRIMET’S COMMITMENT TO EQUITY

TriMet’s commitment to equity can be seen across our agency, the transportation system we manage, and the community we serve. It is embedded in the policies and practices we develop and implement. It is embedded in the investments we make and partnerships we build, our workforce, our approach to contracting and our ever growing connections to our community.

In partnership with our Transit Equity Advisory Committee we continue to look for areas across the agency to improve our overall equity strategy. Continuing to invest

in transit equitably and embracing an inclusive model where equity is a core business objective is critical to TriMet.

As we look to increase our services over the years ahead we look forward to continuing to expand our commitment to equity and fairness within and across our system through the implementation of our Title VI program and beyond.

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.

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.

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 – For the purposes of Title VI, TriMet defines low-income as 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. *[Note: this does not preclude TriMet from applying a higher threshold (e.g. 185 percent or 200 percent of the HHS poverty guidelines) when determining eligibility for income-based programs or services.]*

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.

New Transit Route - A proposed designation of a transit route not currently listed in the TriMet Code Chapter 22- Routes and Schedules; 22.05 Schedule Notices will be considered as a “New Transit Route” as referenced in Part II: Title VI Policies, Major Service Change Policy when such a route designation, if adopted, is to be included in the list of transit routes by subsequent amendment of the TriMet Code. The only such designation not considered as a “New Transit Route” is a change in route number and/or name only with no associated changes in routing, frequency, hours and days of service.

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. Public transportation includes buses, subways, light rail, commuter rail, monorail, passenger ferry boats, trolleys, inclined railways, people movers, and vans. Public transportation 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 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.

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.

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. Title VI Public Notice
2. Title VI Complaint Procedures
3. List of Title VI 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 2013

TITLE VI NOTICE AND COMPLAINT PROCEDURES

TriMet posts the Title VI public notice on the agency website², in all vehicles (bus and rail), and in the administrative offices. TriMet's Title VI complaint form³ and procedures⁴ are also available on the agency website. The Complaint Form is located in Attachment B, and Attachment C shows the vehicle notice.

TriMet's Title VI website notice is stated below:

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:

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

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

⁴ <http://www.trimet.org/about/titlevi-procedure.htm>

"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 send us an email.

From the Title VI Circular

"[Recipients are required] 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."

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.

Mail

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

Phone: 503-962-2217

Fax: 503-962-6469

Email us

You may file a complaint directly with the Federal Transit Administration:

Office of Civil Rights
Attention: Title VI Program Coordinator
East Building, 5th Floor-TCR, 1200 New Jersey Ave., SE
Washington, D.C. 20590

From the Title VI Circular

“[R]ecipients 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 as follows:

Title VI Complaint Procedure

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 Form 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 generally complete an investigation within 90 days from receipt of a completed Complaint Form. If more information is needed to resolve the case, TriMet may contact the complainant. Unless a longer period is specified by TriMet, the complainant will have ten (10) 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, he/she may request reconsideration by submitting a request in writing to TriMet's General Manager within seven (7) 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 (10) days. In cases where reconsideration is granted, the General Manager will issue a

determination letter to the complainant upon completion of the reconsideration review.

TITLE VI INVESTIGATIONS, COMPLAINTS, AND LAWSUITS

From the Title VI Circular

“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.”

Information regarding investigations, complaints and lawsuits for the reporting period is provided below.

Investigations

There were no Title VI investigations during the reporting period.

Lawsuits

No Title VI lawsuits were filed. One lawsuit previously reported in TriMet’s 2013 Title VI Program alleging race discrimination, was dismissed by the 9th Circuit Court of Appeals (*Calbruce Green v. TriMet*, filed July 21, 2011, dismissed, dismissal affirmed on appeal July 8, 2014).

Complaints

Complaints submitted to TriMet were received, investigated and resolved by TriMet staff. Table I-1 lists complaints received during the reporting period. 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.

TABLE I-1: TITLE VI COMPLAINTS RECEIVED BY TRIMET SINCE LAST PROGRAM SUBMITTAL

DATE FILED	SUMMARY	STATUS	ACTION TAKEN/FINDINGS
12/27/13	Complaint filed with FTA alleging that TriMet's transfer policy was not in compliance with FTA Title IV requirements.898	Closed	FTA issued decision letter on 7/17/14 closing the complaint finding that TriMet was not noncompliant with FTA's Title VI requirements, and that no corrective action was needed.
11/18/15	Title VI compliant filed with TriMet alleging poor customer service on a scheduled transportation service alleging discrimination possibly related to a disability.	Cleared	Contracted Lift service provider picked up riders at their home 20 minutes late due to a scheduling manifest error. The late pick up extended their normal travel time.
11/30/15	Title VI Compliant filed with TriMet Alleging Bus Operator did not stop based on race of customer	Cleared	Customer complaint describes them being behind or near a tree next to the stop. Operator reported not seeing the customer at the site. Reviewed operator's record and found no similar complaints.
2/3/2016	Title VI Complaint filed with TriMet Alleging Discrimination when passenger asked to exit vehicle at stop.	Inconclusive	Customer and Operator accounts overlapped and describe a communication error and poor customer service, no evidence of racial bias.

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 D) was originally submitted to the FTA on January 2013 as part of the response to the FTA's Title VI Program Review, and has been updated as part of this submittal. 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.

From the Title VI Circular

"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 targeted 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 geographic 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 identify strategies to engage minority, low-income and LEP populations.

Public Participation Highlights

The following is a summary of TriMet's inclusive public participation since its 2013 Title VI Program submission. The summary spans from September 2013 to June 2016. During this period TriMet conducted outreach for:

- Service Enhancement Plans (SEPs)

- MAX Orange Line and associated bus service changes
- Other service and fare changes
- Construction projects
- TriMet Bike Plan

TriMet's Transit Equity Advisory Committee (TEAC)

The Transit Equity Advisory Committee helps to extend the agency's outreach and involvement to transit dependent riders, as well as serve as a link to community organizations. The panel also provides direction on the agency's transit equity strategy, giving input and guidance on:

- *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.*

Service Enhancement Plans (SEPs)

Since 2012 TriMet has been engaging the community to develop Service Enhancement Plans (SEPs) for the TriMet service district, organized into five geographic subareas (Eastside, North/Central, Southeast, Southwest, and Westside). These SEPs serve as a shared vision for future transit service in the region, and were developed through a robust, multi-year public engagement effort, with special focus on outreach to communities of color, limited-English-proficiency (LEP) populations, and low-income communities.

TriMet began the SEP outreach process by identifying substantial concentrations of **communities of color and LEP communities** within each subarea of the TriMet district. Table I-2 displays the substantial concentrations of minority and LEP populations within each subarea.

Public outreach materials for the SEPs were translated into the languages that were substantially represented in each subarea. Outreach activities targeted to communities of color and LEP communities included:

- Culturally-specific focus groups held in languages other than English when appropriate
- Coordination with community-based organizations and schools to distribute translated materials and solicit feedback

- Attendance at culturally-specific events

TABLE I-2: SUMMARY OF MINORITY AND LEP POPULATIONS BY SEP SUBAREA

SUBAREA	SUBSTANTIAL MINORITY POPULATIONS	SUBSTANTIAL LEP POPULATIONS
Eastside	- Hispanic (17%) - Asian (8%) - Black (5%)	- Spanish - Vietnamese - Russian - Chinese
North/Central	- Black (9%) - Hispanic (8%) - Asian (5%)	- Spanish - Vietnamese
Southeast	- Hispanic (8%) - Asian (6%)	- Spanish - Vietnamese
Southwest	- Hispanic (8%) - Asian (5%)	- Spanish - Vietnamese
Westside	- Hispanic (18%) - Asian (10%)	- Spanish

Outreach efforts to **low-income communities** during development of the SEPs included:

- Direct outreach to clients of social service agencies, such as affordable housing providers and medical clinics that focus on low-income patients
- Direct outreach to Title I schools and early education programs
- Direct mailings to residences in low-income areas
- Focus groups to residents in low-income areas
- In-person outreach at bus stops and rail stations in low-income areas
- Attendance at community events and meetings
- Direct outreach to employers

MAX Orange Line & Associated Bus Service Changes

In September 2015, TriMet opened the **MAX Orange Line** that runs between Downtown Portland and Milwaukie. Marketing and outreach for the opening of the light rail line focused on both safety and service. The Safety Outreach Campaign included newspaper inserts in English and Spanish, thousands of postcard mailings, fact sheets, school “backpack stuffers,” temporary tattoos with safety messaging, guided safety rides for students, advertisements, social media messaging, and Safety Ambassador presence at crossings. To advertise the new service, the “Catch the Orange” campaign included advertisements in community and culturally-specific newspapers, TriMet vehicles, and various other channels. Opening day celebrations

included members of the Grand Ronde tribe leading the first train across the new Tilikum Crossing bridge and holding a Native American potlatch on the riverbank just south of the bridge.

With this opening, TriMet made several **bus service changes** to complement the new light rail service and reduce service redundancies. Community engagement about potential bus service changes began in early 2014. This initial effort described service assumptions from the light rail project's Final Environmental Impact Statement and asked riders what they thought should happen in terms of bus service. Outreach methods included:

- Fact sheets in English and Spanish
- A web page
- Direct mail to addresses within the corridor
- Emails
- Social media
- In-person open houses
- Presentations at community meetings
- On-street outreach at key bus stops

Based on feedback from this effort, planners developed an initial service proposal, including a map. During summer 2014, TriMet sought riders' feedback on this initial proposal through an online survey that included an incentive (drawing to win transit tickets). The survey asked riders to rate the overall proposal and specific elements, and invited open-ended comments. The proposal and survey were promoted with the same methods from the earlier phase, as well as a brochure (English and Spanish) that was distributed on-board relevant bus lines and at key stops. Notices were also posted at all bus stops that would be closed under the proposal, and letters were mailed to properties on streets with new bus traffic proposed.

Again, planners reviewed the feedback received, and refined the service proposal. During fall 2014, TriMet shared a final proposal and asked riders for open-ended comments. Methods included emails, social media, presentations at community meetings and a new brochure (English and Spanish) distributed on-board and at key stops. In early 2015, staff reviewed these comments, conducted the Title VI equity analysis (Attachment K), and finalized the service plan.

In spring 2015, TriMet's Board of Directors held a public hearing and adopted the service plan. During summer 2015, TriMet performed extensive marketing of the service changes, including direct mail to households in the MAX Orange Line corridor that included two all-day transit passes.

Other Service & Fare Changes

In 2013 TriMet began restoring service by adding trips to bus lines where they were most badly needed and implemented some key elements of the Westside Service Enhancement plan, which was completed in September 2013.

- September 2013 service changes included increased frequency and route changes to several bus lines that serve major and growing employers on the west side of the TriMet service district.
- Adjustments to some bus lines that received large service cuts in 2012.
- Creation of a new bus line on the Westside adding frequency of service between the cities of Sherwood and Tigard.

Outreach on these projects included open houses and public hearings from 2012-2013 and implementation in September 2013. TriMet posted ads in community and neighborhood publications and publications of broad circulation. Ads were targeted to communities of color and LEP communities. TriMet also leveraged a strong social media following using posts on Facebook, Twitter, and media releases. Mailings were sent to the impacted service areas announcing the public participation process and the implementation dates. Email lists were also leveraged to communicate with riders and stakeholders interested in service enhancements. TriMet Customer Service conducted on-board outreach using alerts in English and Spanish to communicate the public participation process as well as the final changes prior to implementation.

In 2013 TriMet launched its **Mobile Ticketing app** with a party at the Portland State University Urban Plaza. Extensive outreach promoting the advantages of a paperless fare used email, print ads, social media and stakeholder lists to promote the product and the event to youth, communities of color, minority populations, seniors, and people with disabilities.

TriMet raised the price of **Honored Citizen fares**, which provide a discounted fare for seniors and people with disabilities, in September 2015. Historically, Honored Citizen fares had been set at half the regular adult fare. While regular adult fares have increased over the past several years, the Honored Citizen fare price had not changed since 2010. TriMet conducted a fare equity analysis in March 2015 garnering feedback via a TriMet hosted stakeholder roundtable discussion with representatives of organizations serving older adults and people with disabilities. The fare increase proposal was also reviewed by TriMet's Transit Equity Advisory Committee (TEAC) and the Committee on Accessible Transportation (CAT). A point of focus for TEAC was outreach to communities of color, due to the findings of the equity analysis that people of color are under-represented amongst Honored Citizens. TriMet conducted several listening sessions at senior centers, health centers, cultural centers, and community centers where our key audiences congregate. The meetings were widely promoted in multiple languages via email, print ads and social media.

TriMet conducted outreach to social service agencies that sell Honored Citizen fares to help expand the number of locations where these fares can be purchased.

Title VI fare equity analysis for TriMet's upcoming **Hop Fastpass electronic fare system** entailed partnering with culturally-specific community-based organizations to gather feedback on proposed policies associated with the system. TriMet spoke with low-income, minority, and LEP riders throughout the service district to better understand potential impacts of proposed changes, and to develop mitigation strategies where appropriate.

Finally, in early 2016 TriMet hosted an open house for the **Annual Service Change** which included many service enhancements developed through the SEP process, some of which involved route changes. TriMet sent letters to the areas where stops would close and also where weekend service would be added.

Construction Projects

In March 2015 TriMet launched a construction project to install the necessary infrastructure to support the **Hop Fastpass electronic fare system** that is scheduled to launch in 2017. Staff sent mailings in multiple languages to employers in the project areas, placed advertisements in newspapers of general circulation, met with community and business associations were addressed, and used social media to get the word out about construction zones, service impacts and temporary station closures.

TriMet also conducted extensive outreach for several construction projects at MAX stations to improve safety, extend station longevity and update appearance. Nearby mixed-use development impacted the **Orenco/NW 231st** station, requiring closure of access points and temporary stops in the surrounding neighborhood. Staff conducted outreach in Spanish & English at the station, on-board buses and trains that served the station, and to neighbors. At the opposite end of the service district, the **Blue Line State of Good Repair** project focused on aesthetic and safety improvements at or near aging MAX stations. TriMet send stakeholder emails and neighborhood mailings in multiple languages to inform impacted communities of the project.

In May 2016, TriMet launched a series of four construction projects designed to improve MAX performance via repairs to aging rail and switch equipment on its original light rail alignment built in 1986. The **1st Ave MAX Improvements** project shut down nine MAX stations for two weeks, closed some Downtown streets and disrupted light rail service. The outreach effort for this project was extensive, including newspaper and online ads in multiple languages, presentations to business and cultural groups, numerous media releases, on-board outreach using Spanish & English service alerts, and a mailing to over 20,000 addresses in the project area.

TriMet Bike Plan

In the fall of 2015, TriMet embarked on a series of open houses done in two phases for the **Bike Plan**. The plan is a roadmap that will help guide future investments in

biking infrastructure and amenities that improve bike access to transit stops, expand bike parking options and makes further accommodation for bikes on board trains and buses. In the fall, a series of five open houses were hosted by TriMet at locations in target areas and promoted via stakeholder lists and social media. The second round of five open houses was conducted in the spring of 2016 and promoted more widely using online and newspaper ads in Spanish and English, social media and stakeholder emails.

Title VI Program Update

TriMet utilized a variety of strategies to engage the community as part of the 2016 Title VI Program Update. The box on the next page provides a summary of activities; how the results of this outreach shaped TriMet's Major Service Change, Disparate Impact, and Disproportionate Burden policies and thresholds is described in Part II: Title VI Policies.

Outreach to inform this Title VI Program Update

➤ Community Forums on Transit, Civil Rights, & Equity

TriMet partnered with the Immigrant & Refugee Community Organization (IRCO), Northwest Family Services, and OPAL Environmental Justice Oregon to hold three community meetings from April to June 2016. In total about 50 community members attended the meetings, where TriMet staff presented current Title VI policies and solicited feedback through small-group discussions, with guiding questions on said policies as well as broader transit equity issues. In addition to providing a stipend to these organizations, TriMet paid for food, childcare, and language interpretation, and provided free books of TriMet tickets to participants. Outreach materials are provided for reference in Attachment Q.

➤ Community service provider survey

TriMet also sent a questionnaire to staff at the 96 organizations participating in the agency's Access Transit fare program for low-income transit riders (see Attachment Q). The questionnaire asked about organizational definitions of low-income, observations of changes to service or fares that have had a significant impact on clients served, and examples of evaluating policies or programs for potential disproportionate impacts to low-income persons and/or persons of color. TriMet received a total of 31 responses to the questionnaire.

➤ Dedicated web page and email blast

Once the draft Major Service Change, Disparate Impact, and Disproportionate Burden policies were developed, TriMet created a special webpage on trimet.org including a summary of the proposed policies, the full draft 2016 Title VI Program update, and an opportunity to give feedback. Emails were sent to 4,600 targeted listserv subscribers directing them to the page. From August 12 to September 12, 2016, the page received 700 unique views and ten community members provided comments about the policies.

➤ Transit Equity Advisory Committee (TEAC)

TriMet staff consulted with TEAC throughout the Program update process. The committee gave input on the outreach strategy and materials, and some members helped facilitate discussions at the community forums. At its August 18, 2016 meeting TEAC reviewed and discussed the updated Major Service Change, Disparate Impact, and Disproportionate Burden policies.

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, or LEP. In 2010 TriMet completed its **LEP Access Plan** and Implementation Schedule after an extensive review of the LEP populations in the TriMet service district and their needs. A special LEP Workgroup recommended a two-tiered approach to meeting the needs of LEP populations: 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. This plan continues to guide TriMet as to how to best serve LEP populations and is provided as Attachment E.

From the Title VI Circular

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).

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. TriMet is in the process of updating its Four Factor Analysis, with an anticipated completion of fall 2016. It will rely on the most recent data available, including:

- TriMet GIS, Metro Regional Land Information System
- US Census American Community Survey Tables: 2010 - 2014 (5-Year Estimates)
- Portland Public Schools data on ESL students
- Spring 2016 on-board rider survey
- Summer 2016 operator survey about contact with LEP persons
- Internal data reflecting call center requests for language interpretation and page views of translated versions of www.trimet.org

This updated analysis will guide TriMet efforts to retain successful programs 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.

What is analyzed in a Four Factor Analysis?

- 1. The **number or proportion** of LEP persons eligible to be served or likely to be encountered by the program or recipient.*
- 2. The **frequency** with which LEP persons come into contact with the program.*
- 3. The **nature and importance** of the program, activity, or service provided by the program to people’s lives.*
- 4. The **resources available** to the recipient for LEP outreach, as well as the costs associated with that outreach.*

Census data is included in this report in advance of the completed Four Factor Analysis, shown in Table I-3. This data shows that of the estimated total population aged five years and older within Clackamas, Multnomah, and Washington counties LEP populations represent 8.73 percent with the largest proportion consisting of Spanish speaking LEP individuals (4.18 percent).

The top five languages (Spanish, Vietnamese, Chinese, Russian and Korean) identified using US Census American Community Survey Tables: 2010 - 2014 (5-Year Estimates) mirror the top five languages identified in the 2012 Four Factor Analysis performed by TriMet using the ACS 2006-2010 five-year sample data. These top five languages comprise 75.9 percent of the total LEP population as shown in Table I-3.

Additionally, using Oregon Department of Education data, Somali and Hmong were identified in 2012 as meeting ODT’s “safe harbor” threshold of 1,000 or five percent of the population. More recent data from Portland Public Schools – the largest school district in the region – also indicates that Somali is the fifth most common language spoken by students in the ESL Program (provided as Attachment F).

The map on page 24 (Figure I-1: LEP population and TriMet district) depicts where these LEP populations are concentrated in relation to the TriMet service district. Areas are shaded corresponding to census tracts which had a LEP population greater than or equal to the average for the TriMet District (8.7 percent). Most LEP census tracts are located in the western, eastern, and northern parts of the service area.

TABLE I-3: ACS LANGUAGES SPOKEN BY LEP PERSONS AGE 5 AND OLDER IN TRIMET DISTRICT

Languages Spoken at Home	LEP Population Estimate	Percentage of Total Population	Percentage of LEP Population
Spanish	59,846	4.18%	47.94%
Vietnamese	14,132	0.99%	11.32%
Chinese (Cantonese, Mandarin)	10,152	0.71%	8.13%
Russian	6,834	0.48%	5.47%
Korean	3,850	0.27%	3.08%
Ukrainian*	2,091	0.15%	1.67%
Japanese	2,074	0.14%	1.66%
Tagalog	1,950	0.14%	1.56%
Romanian*	1,862	0.13%	1.49%
Arabic	1,715	0.12%	1.37%
Mon- Khmer, Cambodian	1,407	0.10%	1.13%
Persian	1,097	0.08%	0.88%
Other languages	17,837	1.25%	14.29%
Total	124,848	8.73%	

Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Tables: 2010 - 2014 (5-Year Estimates).

*Ukrainian and Romanian figures were only available for Multnomah and Washington counties

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 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. In the past three years, language assistance has been provided to customers comprising over 50 languages. Sixty five percent of all the calls requesting language assistance are from Spanish Speaking customers. 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 continues to coordinate with the 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. The program continues to use bus bench ads in Spanish to promote the use of public transportation. TriMet also developed bilingual channel cards in English/Spanish for placement on all TriMet vehicles that communicate vital customer information for the following: Fare requirements, availability of TriMet customer assistance, safety and the rules for riding. Channel cards shown in Figures I-2 through I-4 have been placed in all vehicles. TriMet also expanded the number of languages included in its “How to Ride brochure.” Figure I-5 shows the updated brochure cover.

Limited English Proficient Population Distribution

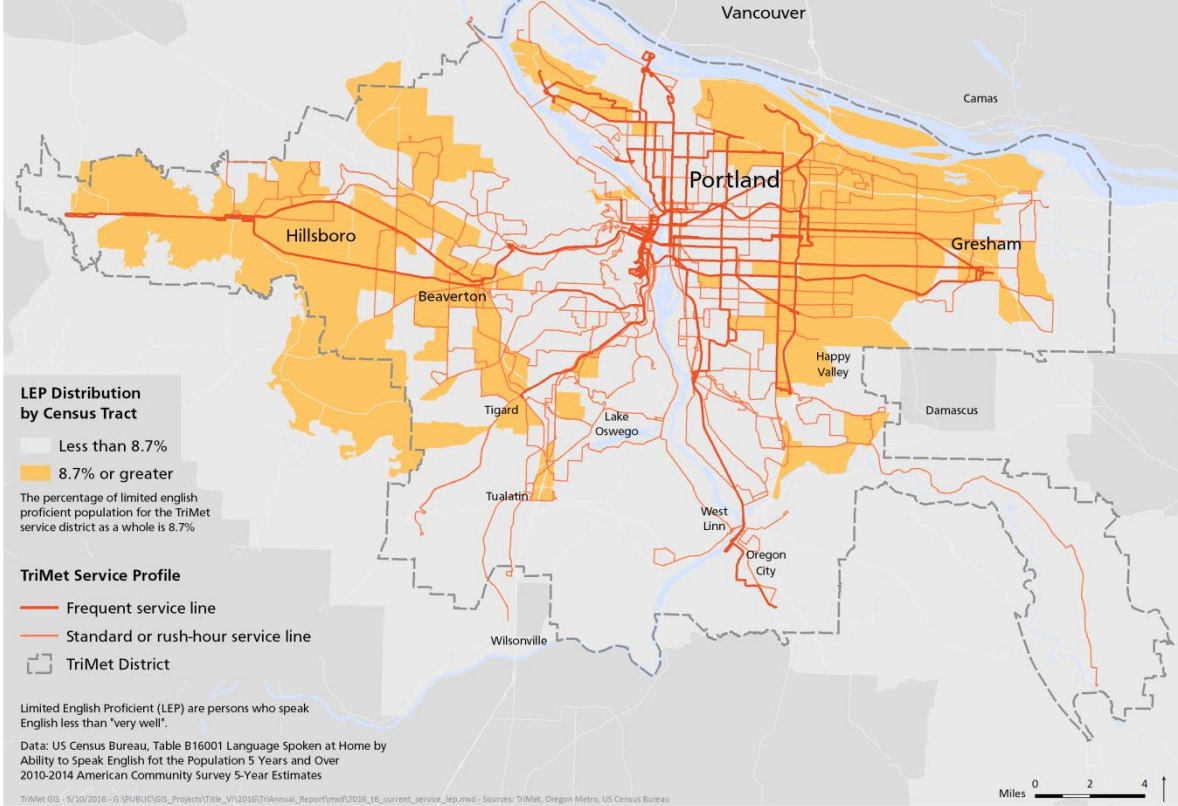


FIGURE I-1: LEP POPULATION AND TRIMET DISTRICT

SEE SOMETHING? SAY SOMETHING.

If you see suspicious behavior or a suspicious package:



Tell a TriMet employee

OR



Call 9-1-1

¿Ve algo extraño?

Díganos si ve comportamiento extraño o un paquete sospechoso. Comuníquese con un empleado de TriMet o llame al 9-1-1.



FIGURE I-2: BILINGUAL SAFETY CHANNEL CARD



FOR YOUR SAFETY

Para su seguridad



Need help? If there's an emergency or an unsafe situation on board, tell the operator or call 9-1-1.
¿Necesita ayuda? Si hay una emergencia o una situación de inseguridad a bordo, comuníquese con el conductor o llame al 9-1-1.



Stay off the tracks. Never play, walk, bike, hike or jog on or near the MAX, WES or Streetcar tracks.
No camine en las vías del tren. No juegue, camine, ande en bicicleta, ni corra cerca de las vías de trenes MAX, WES o el tranvía Streetcar.



Heads up! Don't be distracted by your phone, iPod or tablet. Stay alert and stay safe.
¡Cuidado! No se distraiga con su teléfono, iPod o tableta. Manténgase alerta y cuide su seguridad.



Stop, look and listen before crossing the street or train tracks. Obey all signs and signals.
Mire hacia ambos lados. Pare, mire y escuche antes de cruzar la calle o las vías del tren. Obedezca todos los letreros y señales.



Riding at night? Wear light-colored or reflective clothing and carry a cell phone, flashlight or safety strobe.
¿Viaja de noche? Use vestimenta clara que refleje la luz y cargue su celular, linterna, o luz reflectora!

FIGURE I-3: BILINGUAL FOR YOUR SAFETY CHANNEL CARD



RULES FOR RIDING

Reglas para el viaje



Valid and correct fare is required.
Se requiere boleto apropiado y válido.



In the priority seating area, move for seniors and people with disabilities.
En el área de prioridad, ceda le asiento a personas de edad avanzada y personas con discapacidad.



Don't threaten or intimidate riders or operators.
No amenace ni intimide a otros pasajeros ni al conductor.



Don't be so loud that you disturb others.
No haga ruidos que molesten a los demás.



Don't block the aisles or doors.
No bloquee los pasillos o puertas.



Unless it's a service animal, your pet must be kept in a carrier.
Su mascota debe viajar en una jaula a menos que sea un animal de servicio.



No eating on board, but you can bring food or drinks in closed containers.
No se permite comer a bordo. Puede transportar comida o bebidas en recipientes cerrados.

MAXIMUM PENALTY: \$250/EXCLUSION • TMC 28-29

FIGURE I-4: BILINGUAL RULES FOR RIDING CHANNEL CARD



English • Español • Tiếng Việt
Русский • 中文 • اللغة العربية
Română • 한국어 • 日本語 • Tagalog
ភាសាខ្មែរ • Somali

Fares and how to ride
Tarifas y cómo viajar
Giá vé & cách sử dụng
xe Buýt, xe điện MAX và WES
Плата за проезд
и как поехать
车票价格和乘车指南
ثمن التذاكر وكيفية الركوب
Tarife și modalitatea de
călătorie
요금 과 승차방법
料金および乗車方法
Mga pamasahe at paano
sumakay
ផ្លូវល្អ និង របៀបធ្វើដំណើរ
Tigidhada iyo sida loo raaco

FIGURE I-5: MULTILINGUAL HOW TO RIDE BROCHURE

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, assessments and ongoing assistance.

Project Oversight

TriMet's *Subrecipient Monitoring Procedures* outlines programmatic and fiscal responsibilities of various roles to ensure subrecipients are complying with federal requirements and are using federal funds appropriately. Oversight begins after grant applications are awarded by the federal agency and a specific accounting code is assigned by the Senior Financial Analyst, all the way through close out of the grant.

Project managers, who are ultimately responsible for the achievement of subrecipient outcomes, are involved in every step of the process by: ensuring appropriate agreements are in place, agreements contain the required federal, state and local language and verifying that performance measures and all compliance requirements are met throughout the grant period.

Assessments

The Grant Administrator performs audit assessments of subrecipients by conducting annual compliance reviews, which includes reviewing external annual audits, monthly/quarterly performance reports and Title VI plans and other documents. If results of assessments identify known or potential concerns, the Grant Administrator may conduct additional procedures such as testing payments, site audits to gain an understanding of internal controls and ensuring federal requirements are met such as procurement, equipment purchases, prevailing wages, match and suspension and debarment, when applicable.

Further, the Grant Administrator monitors and provides feedback and training to subrecipients as well as Project Managers on federal compliance requirements.

TriMet's Internal Audit Department also serves as a resource to management in providing special reviews of financial, operational and/or regulatory compliance. Upon request, Internal Audit can review selected programs and assist staff with recommendations by providing independent and objective consulting services.

Ongoing Assistance

The Project Manager and/or the Grant Administrator provide ongoing assistance to subrecipients through communications, trainings (when requested), and access to subject matter experts within TriMet for information and data. Specifically, TriMet has provided the following to subrecipients:

- Demographic data to update their Title VI public participation and language assistance plans; and

- Procurement reviews to ensure federal requirements are met.

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.

From the Title VI Circular

In the case in which 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 federal requirements. If a subrecipient is not in compliance with Title VI regulations, TriMet will work with the subrecipient to ensure compliance, which includes providing data, information, guidance and support for the development and formal adoption of the subrecipient Title VI program components.

To monitor Title VI compliance, TriMet:

- Documents subrecipient compliance with the general requirements;
- Collects and maintains subrecipient Title VI program documents on a designated schedule; and
- Forwards subrecipient Title VI information to the FTA, if requested.

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 30th. TriMet reviews all subrecipient Title VI Programs on a triennial basis and also receives and reviews annual reports submitted on or by April 30th.

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 Oregon State Senate. To provide ongoing feedback on ADA, Transit Equity and Fiscal matters, the General Manager and Board seek guidance from three additional committees: the Committee on Accessible Transportation (CAT), the Transit Equity Advisory Committee (TEAC) and the General Manager Budget Taskforce. Members at each level are recruited to provide diverse perspectives necessary for holistic decision-making. Board membership is presented in Table I-4: TriMet board membership by race/ethnicity below.

TABLE I-4: TRIMET BOARD MEMBERSHIP BY RACE/ETHNICITY

Body	# of Members	White*	Hispanic	Black*	Asian*	Native American*	Hawaiian Native and Pacific Islander*	Other *
Population	1,526,154	72.1%	12.3%	3.4%	7.3%	0.5%	0.5%	3.8%
Board of Directors	7	71%	0%	29%	0%	0%	0%	0%
Finance & Audit Committee	3	67%	0%	33%	0%	0%	0%	0%
GM Budget Task Force (no longer meets)	12	66%	17%	17%	0%	0%	0%	0%
Transit Equity Advisory Committee	14	57%	14%	29%	0%	0%	0%	0%
Committee on Accessible Transportation	14	93%	7%	0%	0%	0%	0%	0%
*Non-Hispanic								

Board and Committee Recruitment

TriMet’s **Board of Directors** is made up of seven members appointed by the Governor of Oregon. There is currently 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.

The **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.

The **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.

The **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.

The **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: eight 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.

FACILITIES SITING AND CONSTRUCTION

Since the last Title VI Program submission in 2013, TriMet has selected a site for one facility meeting the applicable definitions under Title VI, and thereby requiring an equity analysis (provided as Attachment G). TriMet's process for conducting equity

analyses related to facility siting and construction follows the guidance provided in the Circular/Title 49 CFR and included below.

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.

MAJOR SERVICE AND FARE CHANGE 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. Since the time of the last Title VI Program submittal TriMet has implemented several improvements to service and changes to fares. The seven reports noted below cover the equity analyses of all Major Service Changes and all fare changes implemented since September 2013, and are provided as Attachments H – N, along with corresponding documentation of the TriMet board’s consideration, awareness, and approval of each.

- **Fall 2014 Fare & Service Change Equity Analysis Report;** May 22, 2014
 - Board approval at June 11, 2014 business meeting
- **Ordinance No. 332 Transfer Policy Change: Fare Equity Analysis;** December 9, 2014
 - Board approval at December 10, 2014 business meeting
- **Equity Analysis: Weekend Frequent Service Restoration;** March 3, 2015
 - Board approval at May 27, 2015 business meeting
- **Equity Analysis: Orange Line MAX Startup & Bus Service Plan;** April 17, 2015
 - Board approval at May 27, 2015 business meeting
- **Equity Analysis: Honored Citizen Fare Increase;** April 17, 2015 [Updated May 20, 2015]
 - Board approval at May 27, 2015 business meeting
- **Title VI Fare Equity Analysis for Migration to E-Fare;** January 6, 2016
 - Board approval at February 24, 2016 business meeting
- **Equity Analysis: Spring 2016 – Spring 2017 Service Changes;** March 16, 2016
 - Board approval at April 27, 2016 business meeting

Part II: Title VI Policies

This section provides the following policies and standards, as approved by the TriMet board:

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

Policies on Major Service Change, Disparate Impact, and Disproportionate Burden have been shared for public information, awareness, and comment. They were informed by a series of three community forums and a questionnaire sent to community service providers in spring and summer 2016, as well as feedback gathered since TriMet's last submittal in 2013. 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.

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.

TriMet defines a Major Service Change as:

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

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

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

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

The strategy TriMet employed to inform the Major Service Change threshold was asking community members and non-profit service providers to describe a change in the recent past from which they or the clients they serve felt the impacts (either positive or negative). The idea to lower the Major Service Change threshold to 15 percent (previously 25 percent) arose from community feedback that even relatively small service changes can have significant impacts on those who rely most on TriMet to meet their transportation needs. While two online commenters expressed concern that lowering the threshold would add costs and delays to changing service, the majority of responses to the changes were supportive. (TriMet staff does not anticipate that this change will increase costs or add delay to service changes).

Two questions framing the discussions at community forums (see Attachment X) were designed to test whether community members valued the various types of changes differently, including service increases compared to decreases. Priorities varied amongst participants, but overall increasing span of service was valued somewhat higher than other improvements. For service cuts, participants generally indicated that reducing frequency was preferable to other types of cuts. After

considering this input and how it would impact the equity analysis process going forward, TriMet opted to keep a consistent – but lower – threshold for all types of changes.

DISPARATE IMPACT POLICY

The Disparate Impact Policy establishes a threshold for determining whether a given action has a potential Disparate Impact on minority populations.

In the course of performing a Title VI equity analysis for possible Disparate Impact, TriMet will analyze how the proposed Major Service Change or fare change action could impact minority populations, as compared to non-minority populations.

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...

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

From the Title VI Circular

The [Disparate Impact] 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.

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

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

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

1. In the event of potential adverse effects resulting from service reductions:
 - a) A Major Service Change to a *single line* will be considered to have a potential Disparate Impact if the percentage of impacted minority population in the service area of the line exceeds the percentage of minority population of the TriMet District as a whole by at least 3 percentage points (e.g., 31 percent compared to 28 percent).
 - b) To determine the *system-wide* impacts of Major Service Change reductions on more than one line, the percentage of the TriMet district's minority population that is impacted is compared to the percentage of the TriMet district's non-minority population that is impacted. If the percentage of the minority population impacted is at least 20 percent greater than the percentage of the non-minority population impacted (e.g., 12 percent compared to 10 percent), the overall impact of changes will be considered disparate.
2. In the event of service improvements:
 - a) A major service change to a *single line* will be considered to have a potential Disparate Impact if:
 - i. The improvement is linked to other service changes that have disproportionate and adverse effects on minority populations, or;
 - ii. The percentage of impacted minority population in the service area of the line is less than the percentage of minority population of the TriMet District as a whole by at least 3 percentage points (e.g., 25 percent compared to 28 percent).
 - b) To determine the *system-wide* impacts of major service change improvements on more than one line, the percentage of the TriMet district's minority population that is impacted is compared to the

percentage of the TriMet district's non-minority population that is impacted. If the percentage of the minority population impacted is at least 20 percent less than the percentage of the non-minority population impacted (e.g., 8 percent compared to 10 percent), the overall impact of changes will be considered disparate.

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

Upon determination of Disparate Impact, TriMet will either:

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

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

Feedback on this Program and the policies therein generally did not differ between how TriMet should treat analysis of disparities based on race (Disparate Impact) and income (Disproportionate Burden). Thus, the two policies remain equivalent.

At the community forums, held in partnership with community-based organizations, participants were asked whether they felt that looking at the low-income and minority population living by transit lines proposed for changes was a good way to measure potential impacts, or whether there were other factors TriMet should consider. Participants supported the former population-based approach as a piece of what should be considered, but consistently suggested TriMet include access to jobs, education, and health care when conducting equity analysis. After reviewing the draft policies, TEAC recommended adding food access to this list.

Much of the feedback received through all outreach methods focused on affordability of fares. Community members were concerned about the burden that transportation

costs place on low-income families. TriMet's current Disparate Impact policy for fare changes establishes a high standard for identifying differential impacts in the event of fare changes; therefore it was not modified for this Program update.

DISPROPORTIONATE BURDEN POLICY

The Disproportionate Burden Policy establishes a threshold for determining whether a given action has a potential Disproportionate Burden on low-income populations.

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.

From the Title VI Circular

The [Disproportionate Burden] 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....

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

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

1. A decrease in the level of transit service (hours, days, and/or frequency); and/or

2. Decreased access to comparable transit service, which is defined as an increase of the access distance to beyond one-quarter mile of bus stops or one-half mile of rail stations.

The determination of 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, as well as for both service reductions and service improvements:

1. In the event of potential adverse effects resulting from service reductions:
 - a) A Major Service Change to a *single line* will be considered to have a potential Disproportionate Burden if 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 by at least 3 percentage points (e.g., 31 percent compared to 28 percent).
 - b) To determine the *system-wide* impacts of Major Service Change reductions on more than one line, the percentage of the TriMet district's low-income population that is impacted is compared to the percentage of the TriMet district's non-low-income population that is impacted. If the percentage of the low-income population impacted is at least 20 percent greater than the percentage of the non-low-income population impacted (e.g., 12 percent compared to 10 percent), the overall impact of changes will be considered disparate.
2. In the event of service improvements:
 - c) A major service change to a *single line* will be considered to have a potential Disproportionate Burden if:
 - iii. The improvement is linked to other service changes that have disproportionate and adverse effects on low-income populations, or;
 - iv. The percentage of impacted low-income population in the service area of the line is less than the percentage of low-income population of the TriMet District as a whole by at least 3 percentage points (e.g., 25 percent compared to 28 percent).
 - d) To determine the *system-wide* impacts of major service change improvements on more than one line, the percentage of the TriMet district's low-income population that is impacted is compared to the percentage of the TriMet district's non-low-income population that is

impacted. If the percentage of the low-income population impacted is at least 20 percent less than the percentage of the non-low-income population impacted (e.g., 8 percent compared to 10 percent), the overall impact of changes will be considered disparate.

3. Additional considerations to complement the quantitative Disproportionate Burden analysis above may include evaluating impacts to accessing employment, education, food, or health care for low-income populations.

Upon determination of Disproportionate Burden, TriMet will either:

- c) Alter the service proposal to avoid, minimize, or mitigate potential Disproportionate Burdens, or;
- d) Provide a substantial legitimate justification for keeping the proposal as-is, and show that there are no alternatives that would have a less Disproportionate Burden on low-income riders but would still accomplish the project or program goals.

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 other populations include all such differences that are documented as statistically significant at the 95 percent confidence level.

Public Participation

Feedback on this Program and the policies therein generally did not differ between how TriMet should treat analysis of disparities based on race (Disparate Impact) and income (Disproportionate Burden). Thus, the two policies remain equivalent.

At the community forums, held in partnership with community-based organizations, participants were asked whether they felt that looking at the low-income and minority population living by transit lines proposed for changes was a good way to measure potential impacts, or whether there were other factors TriMet should consider. Participants supported the former population-based approach as a piece of what should be considered, but consistently suggested TriMet include access to jobs, education, and health care when conducting equity analysis. After reviewing the draft policies, TEAC recommended adding food access to this list.

Much of the feedback received through all outreach methods focused on affordability of fares. Community members were concerned about the burden that transportation costs place on low-income families. TriMet's current Disproportionate Burden policy

for fare changes establishes a high standard for identifying differential impacts in the event of fare changes; therefore it was not modified for this Program update.

Part III: System-Wide Service Policies and Standards

In December 2014 the TriMet Board adopted the following five priority considerations for service planning decision-making (Attachment O provides TriMet’s full Service Guidelines Policy):

- Equity
- Demand
- Productivity
- Connections
- Growth

These considerations guide how TriMet identifies and executes service changes, and are incorporated into each year’s Annual Service Plan.

Beyond these priority considerations, TriMet has also established 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 provide valued transit service that is safe, dependable, and easy to use. They 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 are used to determine if a bus or train is overcrowded. Table III- 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.

Vehicle passenger load is measured by the average load and the ratio of average 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.

TABLE III-1: 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
<i>Notes: All MAX operates as 2-car trains. WES may operate as a single-car or a 2-car train.</i>				

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 for most of the day, seven days a week.

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 Service Guidelines Framework.

Twelve bus lines and all five MAX lines are considered frequent service. TriMet has not adopted headway standards for lines that do not meet the criteria for frequent service; however, at minimum lines should operate with headways of no more than 60 minutes during weekday peak periods.

Due to budget constraints resulting from the Great Recession, beginning in 2009 TriMet was forced to reduce service on most frequent service bus and MAX lines during off-peak hours and on weekends. However, because TriMet made a commitment to prioritize the restoration of frequent service once resources were available, the agency has now fully restored this service to 15 minutes or better, most of the day, every day.

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 serve 48 percent of the population of the TriMet Service District (about 725,000 of a total of 1.5 million). Among populations served by frequent service, 31 percent are minority and 30 percent are low-income as defined by TriMet. These shares are greater than the overall minority (28 percent) and low-income (24 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 May 2016 stop locations and the residential address points within a half mile buffer around stops. 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 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

Bus catcher information displays (BCIDs): Displays that include route number; route name; direction; route-specific maps; route schedules; stop name; Stop ID numbers for use with TransitTracker™ via phone, text or at trimet.org; and call-to-action. BCIDs are placed at bus stops with 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 name; Stop ID number for use with TransitTracker™ via phone, text or 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; stop name; simple route map; Stop ID number for use with TransitTracker™ via phone, text or 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 2016).

Digital equipment such as electronic real-time arrival displays are placed along bus routes in complicated transit environments such as high traffic transit centers, the Portland Transit Mall, and private investment partnerships (e.g. Go Lloyd and OHSU).

Light and Commuter Rail

Pylon information displays: two-side or four-sided displays that include a rail-specific map; route schedules or frequency charts; Stop ID numbers for use with TransitTracker™ via phone, text or trimet.org; and call-to-action. These are placed at all MAX and WES stations.

Digital equipment such as electronic arrival displays next vehicle arrival displays are placed along rail/fixed guideway stations at all stations built since 2004. A retrofitted installation of displays at stations that currently have no electronic information began in fall 2013, in approximate order of higher to lower ridership. Stations included in the Blue Line Station Rehabilitation Project (from Hollywood/NE 42nd to Cleveland station) that do not already have displays will receive them as part of that project. Some stations have existing environmental constraints that may delay the installation of electronic information.

VEHICLE ASSIGNMENT

Assigning which vehicles serve which routes involves several considerations. For buses, ridership is the primary determinant, so those communities with the greatest need for and use of transit generally are served by newer vehicles. TriMet's fleet as of September 2016 includes 654 buses, all of which are low-floor and are equipped with automated stop announcement systems.

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.

For MAX light rail, vehicles 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 light rail fleet includes 145 train cars of which 119 are low-floor. All cars are equipped with air conditioning, and high-floor cars are always paired with a low-floor car to provide ADA accessibility.

From the Title VI Circular

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.

TriMet's WES commuter rail fleet includes three self-powered diesel-multiple units (DMUs) and one "trailer" non-powered car which were built in 2007 and placed in operation with the start of WES service in 2009. Two more cars (a "married pair") were built in 1952 and 1953 and placed in operation in 2011.

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

Part of TriMet's compliance with FTA Circular 4702.1B is ongoing performance monitoring across all modes of service (bus, MAX, and WES). This monitoring is meant to ensure that TriMet is providing service in a way that does not discriminate on the basis of race, color, or national origin. Specifically, TriMet monitors the following service and performance metrics:

1. "Minority" and "Non-minority" lines
2. Service frequency and span
3. On-time performance
4. Vehicle loads
5. Service availability
6. Stop amenities
7. Vehicle assignment

1. MINORITY & NON-MINORITY LINES

"Minority" lines, as defined by the FTA, are lines that provide at least 1/3 of their service (measured by revenue hours) in block groups that are above-average minority population. "Non-minority" lines are all others.

Currently TriMet operates a total of 86 lines, including 78 bus lines, 5 MAX light rail lines, and 1 WES commuter rail line. Of these, 40 bus lines as well as 4 MAX lines are considered minority lines. The remaining 38 bus lines, 1 MAX line, and WES commuter rail are considered non-minority lines. In previous reports WES had been considered a minority line, but updated data from the 2010-2014 American Community Survey indicates a change in demographics around station areas to a lower percentage minority population.

As of spring 2016, Minority lines account for 66% of TriMet system service (measured by revenue hours), and 78% of system boarding rides. TriMet generally aligns service with mobility needs and ridership, thus lines serving areas with above-average minority populations typically have higher ridership and therefore a higher overall level of service than non-minority lines.

2. SERVICE FREQUENCY & 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 Tables IV-1 through IV-3

following, the frequency and time span of service is noted for minority and non-minority lines, with comparisons during each time period and for weekday, Saturday, and Sunday.

Findings

1. Weekday service on minority bus lines is more frequent than service on non-minority lines during all time periods.
 2. Saturday service on minority bus lines is more frequent than on non-minority lines during the day, equal in frequency during evenings and slightly less frequent during early AM and night.
 3. Sunday service on minority bus lines is less frequent than on non-minority lines during all time periods.
 4. A higher proportion of minority bus lines operate on Saturday (63 percent) and Sunday (60 percent) than non-minority bus lines on Saturday (39 percent) and Sunday (32 percent).
 5. Service on minority MAX lines is slightly less frequent than service on the one non-minority line (MAX Orange Line) during most time periods on weekdays, Saturdays, and Sundays.
 6. A higher proportion of minority bus lines operate on Saturday (63 percent) and Sunday (60 percent) than non-minority bus lines on Saturday (39 percent) and Sunday (32 percent). All MAX lines operate on Saturday and Sunday.
 7. The average span of service (hours lines are serving riders from start to end of service) on minority lines exceeds the span of service on non-minority lines for bus and MAX on weekdays, Saturdays, and Sundays.
- While non-minority lines on average provide more frequent service during several time periods, especially on Sundays, this is offset by the greater number and proportion of minority lines operating on weekends, as well as the earlier average start of service and later end of service for minority lines for all days and modes. Thus, there are no Disparate Impacts on minority population in regard to frequency or span of service on bus, MAX, or WES.

Table IV-1: Frequency and Span of Service
 Minority and Non-Minority Transit Lines by Mode and Day of Service
 Spring 2016 Service – Weekdays Only

Day of Service	Mode of Service	Line Classification	No. of Lines in Service	% of Weekday Lines in Service	Average Frequency of Service (mins.) ¹						Avg. Time Service Begins	Avg. Time Service Ends	Span of Service (hours) ²
					Early AM	AM Peak	Midday	PM Peak	Evening	Night			
Weekday	Bus	Minority Lines	40	100%	28	28	33	29	28	37	5:14	22:28	16.3
		Non-Minority Lines	38	100%	31	34	44	37	37	42	5:38	20:50	13.2
		All bus lines	78	100%	29	31	38	33	32	39	5:25	21:40	14.8
	MAX Light Rail	Minority Lines	4	100%	17	13	14	13	14	27	3:44	1:12	21.4
		Non-Minority Line	1	100%	15	12	15	11	11	23	4:06	0:20	20.2
		All MAX lines	5	100%	16	12	14	12	13	26	3:49	1:01	21.2
	WES Commuter Rail	Non-Minority Line	1	100%	30	30		30	30		5:21	20:02	9.1
	System	Minority Lines	44	100%	26	27	31	27	27	36	5:06	22:43	16.7
		Non-Minority Lines	40	100%	30	33	43	36	36	40	6:26	20:58	12.7
		All lines	84	100%	28	30	36	31	31	37	5:40	21:40	14.6

Notes:

¹Early AM = Start of service to 6:59 am; AM Peak = 7-8:59 am; Midday = 9 am - 3:59 pm; PM Peak = 4-5:59 pm; Evening = 6-7:59 pm; Night = 8 pm to end of service.

²Span of Service includes only the hours when lines are serving riders. For most lines this is simply the amount of time from the beginning of the first trip to the end of the last trip. However, some lines have gaps during the middle of the day, so their span is adjusted accordingly.

Table IV-2: Frequency and Span of Service
 Minority and Non-Minority Transit Lines by Mode and Day of Service
 Spring 2016 Service – Saturday Only

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	Day	Evening	Night			
Saturday	Bus	Minority Lines	25	63%	41	31	34	41	6:00	0:04	18.1
		Non-Minority Lines	15	39%	40	34	34	39	6:41	22:48	15.9
		All bus lines	40	51%	41	32	34	41	6:15	23:35	17.3
	MAX Light Rail	Minority Lines	4	100%	25	15	14	24	3:54	1:23	21.5
		Non-Minority Line	1	100%	24	15	15	23	5:29	1:16	19.8
		All MAX lines	5	100%	25	15	14	24	4:13	1:22	21.1
	System	Minority Lines	29	66%	38	29	31	38	5:43	0:15	18.5
		Non-Minority Lines	16	40%	39	33	32	37	6:36	22:48	16.2
		All lines	45	54%	38	30	32	38	6:01	23:45	17.7

Notes:

¹Early AM = Start of service to 7:59 am; Day = 8 am-5:59 pm; Evening = 6-7:59 pm; Night = 8 pm to end of service.

²Span of Service includes only the hours when lines are serving riders. For most lines this is simply the amount of time from the beginning of the first trip to the end of the last trip. However, some lines have gaps during the middle of the day, so their span is adjusted accordingly.

Table IV-3: Frequency and Span of Service

Minority and Non-Minority Transit Lines by Mode and Day of Service
Spring 2016 Service – Sunday Only

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	Day	Evening	Night			
Sunday	Bus	Minority Lines	24	60%	45	33	37	43	6:15	23:50	17.6
		Non-Minority Lines	12	32%	34	32	29	38	6:54	23:06	16.2
		All bus lines	36	46%	42	33	35	41	6:27	23:36	17.2
	MAX Light Rail	Minority Lines	4	100%	30	17	15	23	3:53	1:20	21.4
		Non-Minority Line	1	100%	29	17	15	26	5:29	1:16	19.8
		All MAX lines	5	100%	30	17	15	24	4:12	1:19	21.1
	System	Minority Lines	28	64%	42	31	34	39	5:55	0:03	18.1
		Non-Minority Lines	13	33%	32	27	24	32	6:47	23:17	16.5
		All lines	41	49%	39	31	32	38	6:10	23:49	17.6

Notes:

¹ Early AM = Start of service to 7:59 am; Day = 8 am-5:59 pm; Evening = 6-7:59 pm; Night = 8 pm to end of service.

²Span of Service includes only the hours when lines are serving riders. For most lines this is simply the amount of time from the beginning of the first trip to the end of the last trip. However, some lines have gaps during the middle of the day, so their span is adjusted accordingly.

3. ON-TIME PERFORMANCE

TriMet continuously monitors on-time performance on bus and MAX through CAD-AVL systems, and by direct observation on WES. TriMet defines “on-time” as no more than five minutes late or one minute early. In this analysis, the on-time performance for bus and MAX lines is compared between minority and non-minority lines on weekdays, Saturday, and Sunday (Table IV-4). WES commuter rail on-time data includes all service, weekdays.

Table IV-4: On-Time Performance
 Minority and Non-Minority Transit Lines by Mode and Day of Service
 Weekday, Saturday, Sunday
 Spring 2016 Service

Mode of Service	Day	Avg. % On-Time (weighted) ¹		Difference; Minority to Non-Minority +/-
		Minority Lines	Non-Minority Lines	
Bus	Weekday	81%	81%	0%
	Saturday	83	83	0
	Sunday	85	86	(1)
MAX Light Rail ²	Weekday	80	82	(2)
	Saturday	82	86	(4)
	Sunday	82	83	(1)
WES Commuter Rail	Weekday	n/a	97	n/a

Notes:

¹For 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”. Weighted by revenue vehicle hours.
²MAX Orange Line is the only non-minority MAX Light Rail line. Orange Night Bus excluded from average percent on-time calculation.

Findings

1. Minority and non-minority bus lines’ on-time performance is similar for weekdays, Saturdays, and Sundays.
2. MAX on-time performance for the four minority lines is somewhat lower than the performance of the one non-minority line during weekdays (80 percent vs. 82 percent) and Saturdays (82 percent vs. 86 percent), and is similar on Sundays.
3. WES on-time performance is 97 percent.

- While bus on-time performance indicates no Disparate Impact on minority riders, MAX shows slightly lower performance on minority lines because the one non-minority line is the newest in the system (the MAX Orange Line, opened in September 2015). The differences are within the established system-wide Disparate Impact threshold of 20 percent. Nonetheless, TriMet has recently launched a broad initiative to improve on-time performance for the MAX system, which should serve to make all MAX lines more comparable.

4. VEHICLE LOADS

Vehicle loads are examined to determine whether buses or trains are overcrowded. Table IV-5 shows vehicle capacities (including both seating and standing), and Table IV-6 compares average vehicle loads for minority and non-minority lines during the A.M. Peak, Midday, and P.M. Peak times.

Table IV-5: 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.

Table IV-6: Vehicle Loads
 Minority and Non-Minority Transit Lines
 Weekday by Mode and Time Period
 Spring 2016 Service

	Time Period ¹	Minority Lines		Non-Minority Lines	
		Load/Seat Ratio	Mean Load	Load/Seat Ratio	Mean Load
Bus (28 or 39 seats)	AM Peak	0.45	18.3	0.36	17.3
	Midday	0.44	17.0	0.39	14.2
	PM Peak	0.54	19.9	0.47	17.5
MAX Light Rail (128 seats)	AM Peak	0.80	107.2	1.01	115.0
	Midday	0.69	88.2	0.40	61.5
	PM Peak	1.08	120.2	0.33	88.3
WES Commuter Rail (146 seats)	AM Peak	n/a	n/a	0.55	50.0
	PM Peak	n/a	n/a	0.61	64.0

¹AM Peak = 7:00 - 8:59 am; Midday = 9:00 am - 3:59 pm; PM Peak = 4:00 - 5:59pm

Findings

1. Average load/seat ratios range from a low of 0.36 to a high of 1.08. While the load-to-seat ratio is above 1.0 for the non-minority MAX line during AM Peak and for minority MAX lines during PM Peak, all modes are below the maximum load factor for every time period and across both minority and non-minority lines.
 2. Minority lines have somewhat larger loads than non-minority lines across all time periods, with the exception of AM Peak MAX. Observed loads on both groups of lines are well within the established maximum load factor standards.
- Thus, there is no Disparate Impact on minority population in regard to vehicle loads.

5. 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. Table IV-7 on the next page presents the availability of service by mode for Spring 2016 service.

Findings

1. The percent of minority population with service available exceeds that of the non-minority populations for bus (91 percent vs. 88 percent), MAX (20 percent vs. 15 percent) and WES (>1 percent vs. <1 percent).
- Thus, there are no Disparate Impacts on minority population in regard to availability of service on bus, MAX or WES.

Table IV-7: Availability of Service by Mode
 Minority and Non-Minority Population
 TriMet District
 Spring 2016 Service

			Number and Percentage within 1/2 Mile* of...							
			TriMet District*		Bus		MAX		WES	
			Totals	%	Totals	%	Totals	%	Totals	%
Population (ACS 5 year estimate, 2010-2014)			1,526,154	100.0%	1,348,969	88.4%	245,669	16.1%	11,979	0.8%
Minority	All Minorities		426,154	27.9%	385,900	90.6%	84,483	19.8%	4,754	1.1%
	Black (non-Hispanic)		52,529	3.4%	50,463	96.1%	12,216	23.3%	180	0.3%
	Hispanic		188,244	12.3%	172,742	91.8%	39,850	21.2%	3,631	1.9%
	Asian (non-Hispanic)		112,128	7.3%	97,097	86.6%	20,023	17.9%	433	0.4%
	Native American (non-Hispanic)		8,263	0.5%	7,475	90.5%	1,501	18.2%	65	0.8%
	Hawaiian Native and Pacific Islander (non- Hispanic)		7,490	0.5%	7,131	95.2%	1,306	17.4%	46	0.6%
	Other (Including Mixed Race, non- Hispanic)		57,500	3.8%	50,993	88.7%	9,586	16.7%	398	0.7%
Non-Minority	White (Non- Hispanic)		1,100,000	72.1%	963,069	87.6%	161,187	14.7%	7,225	0.7%

Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Tables: 2010 - 2014 (5-Year Estimates), Table B03002. Hispanic or Latino Origin By Race (Block Group Level Data)

To adjust for the fact that some census block groups are only partially within the TriMet Transit District, we estimated the fraction of each block group's population within the transit district by calculating the percentage of residential address points that fell within the district. We then multiplied this address fraction by the Census counts to get the estimated TriMet District population. We used Oregon Metro's Master Address File (with non-residential and vacant addresses removed) as the address points for this analysis.

* Distance calculations based on May 2016 stop and station locations. Similar to the TriMet District level population estimates, we multiplied each block group's counts by the fraction of addresses within it that also fell within a half mile buffer of a transit stop of the specified type.

6. STOP AMENITIES

TriMet analyzes the distribution of stop amenities in the TriMet system (shelters, seating, waste receptacles, etc.) in order to identify any potential disparities. Table IV-8 shows the percentage of stops along minority and non-minority lines containing each amenity.

Table IV-8: Stop Amenities on Minority and Non-Minority Lines
Spring 2016

Category of Amenity	Pct of Stops on Minority Lines	Pct of Stops on Non-Minority Lines
Seating	39%	24%
Lighting	60%	65%
Elevators	<1%	<1%
Digital Displays	3%	1%
Shelters	22%	12%
Signs, Maps and/or Schedules	85%	74%
Waste Receptacles	18%	10%

Findings

1. The percentage of stops containing each amenity on minority lines exceeds the percentage for non-minority lines in all categories examined with the exception of lighting, which is higher for non-minority lines (65 percent compared to 60 percent of stops). However, this is within the system-wide Disparate Impact threshold of 20%.
 - Thus, there is no Disparate Impact on minority population in regard to the distribution of amenities.

7. 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. For bus and MAX, average age is calculated by weighting the age of vehicles by the number of hours in service. For WES, the age of primary and spare vehicles are listed separately because vehicle assignment is done differently than for the other modes. Vehicle assignment is shown in Table IV-9.

Table IV-9: Vehicle Assignment
Average Age of Vehicles Assigned by Mode
Spring 2016 Service

Mode of Service	Average Age of Vehicles Assigned (Years)		Difference; Minority to Non-Minority +/-
	Minority Lines	Non-Minority Lines	
Bus	8.3	7.5	1.7
MAX Light Rail	13.8	12.0	1.8
WES Commuter Rail	n/a	Primary: 9.0 Spares: 63.5	n/a

Findings

1. The average age of vehicles on minority bus lines (8.3 years) is about 11% older than the average age of vehicles on non-minority bus lines (7.5 years). This is within the system-wide Disparate Impact threshold of 20%.
 2. The average age of vehicles on minority MAX lines (13.8 years) is 15% older than the average age of vehicles on the non-minority MAX line (12.0 years). This is because the one non-minority MAX line is the newest in the system and involved the procurement of multiple new MAX vehicles. The difference is within the system-wide Disparate Impact threshold of 20%.
 3. For WES, TriMet does not maintain a detailed database of specific vehicles used for specific trips. The four main vehicles used for WES service were all built in 2007; the remaining two were built in 1952 and 1953 and are typically used as spares. WES is a non-minority line.
- Thus, there are no Disparate Impacts on minority population in regard to vehicle assignment on bus, MAX, or WES.

SUMMARY

As summarized in Table IV-10, TriMet finds no disparities in terms of performance standards that would indicate lesser service provision to minority riders or populations. Across nearly every metric minority lines actually performed better than non-minority lines, and minority populations have better access to the TriMet system based on residential proximity to service.

Table IV-10: Evaluation and Findings – Service Standards and Policies
 Comparison of Minority and Non-Minority Lines
 Spring 2016

	Mode of Service			
	Bus	MAX	WES	System
Service Standards				
<i>Vehicle Loads</i>	✓	✓	✓	✓
<i>Service Frequency & Span</i>	✓	✓	✓	✓
<i>On-Time Performance</i>	✓	✓	✓	✓
<i>Service Availability</i>	✓	✓	✓	✓
Distribution of Amenities				
<i>Seating</i>				✓
<i>Lighting</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				

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 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:

- 2010-2014 American Community Survey (ACS)
- 2016 TriMet On-board Fare Survey

CURRENT SERVICE AND SERVICE AREA

The maps on the next four pages display the distribution of minority, low-income, and LEP populations in relation to the 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.

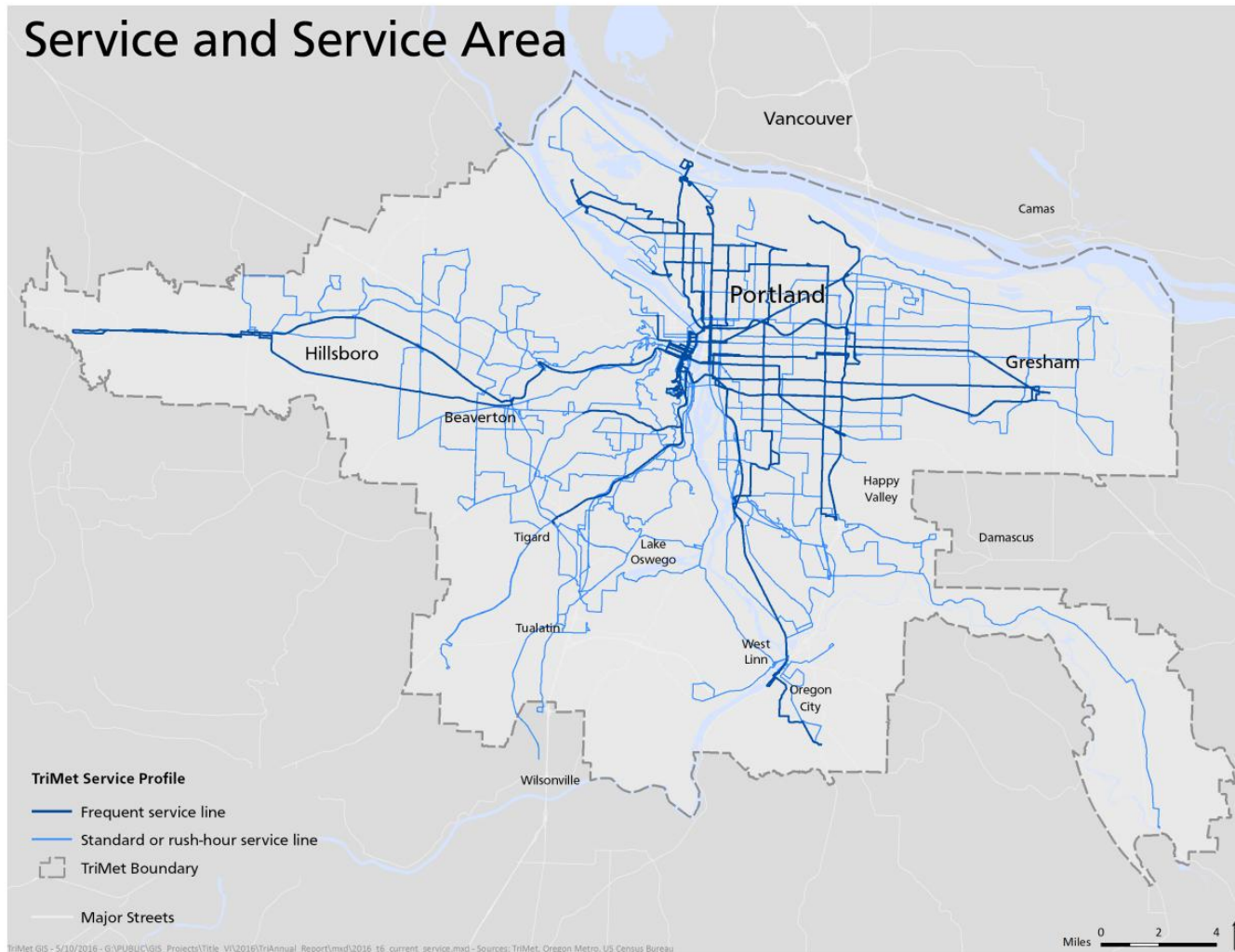


FIGURE V-1: SERVICE AND SERVICE AREA

Service Area with **Minority Population** in Figure V-2 depicts the TriMet 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 (27.9 percent) as of the 2010-2014 ACS.

Patterns are largely similar to TriMet's last Title VI Program submittal in 2013: most areas with higher concentration of minority populations are distributed across the western, eastern, and northern parts of the service area. A few block groups in the southern areas of the TriMet district now have above-average minority populations, whereas they were below average in 2013 (near Oregon City and West Linn, for example).

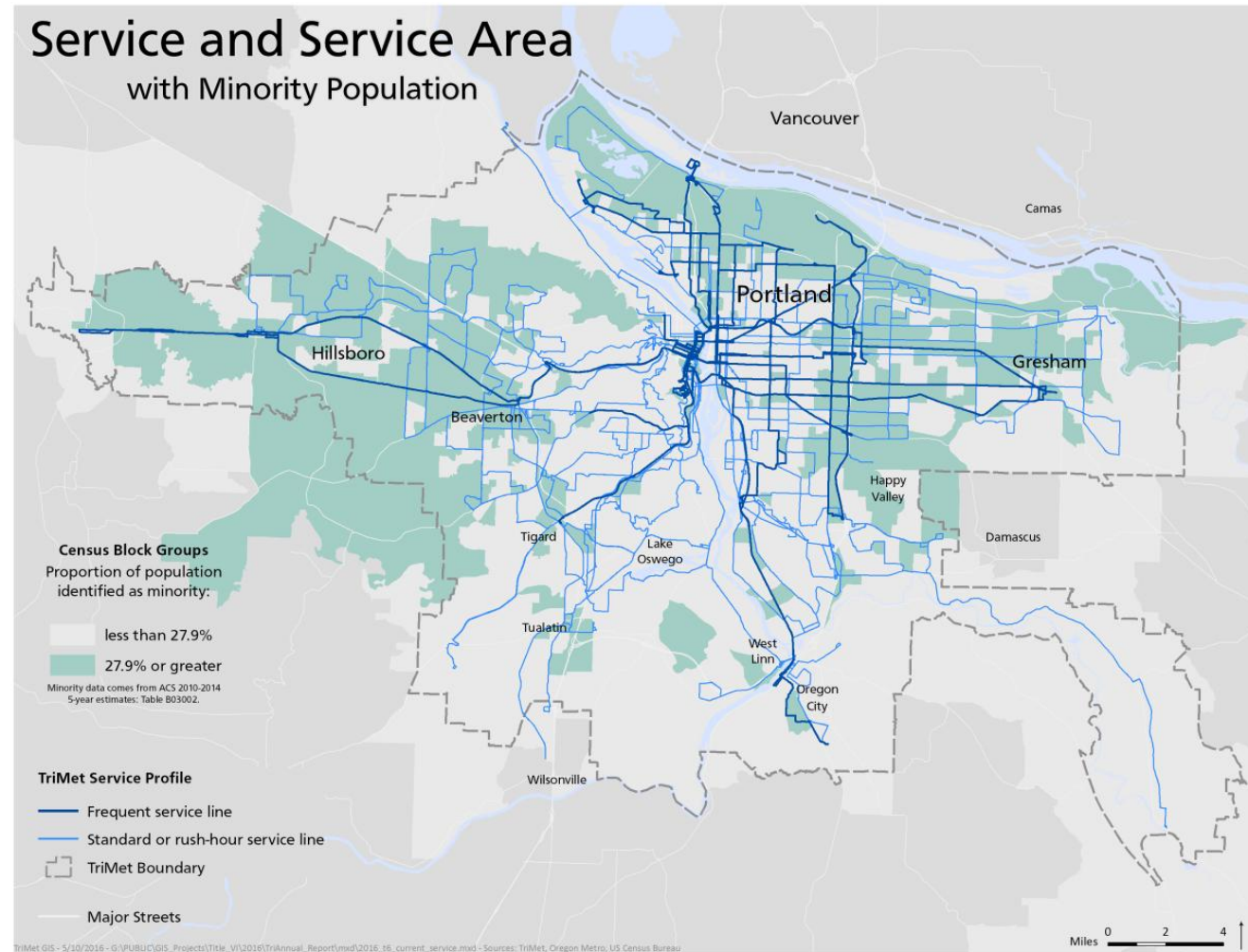


FIGURE V-2: SERVICE AND SERVICE AREA WITH MINORITY POPULATION

Service and Service Area with **Low-Income Population** in Figure V-3 depicts the TriMet 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 Poverty Level. Areas are shaded corresponding to block groups which had low-income populations greater than or equal to the average for the TriMet District (23.6 percent) as of the 2010-2014 ACS. High concentrations of low-income households are found throughout the service area.

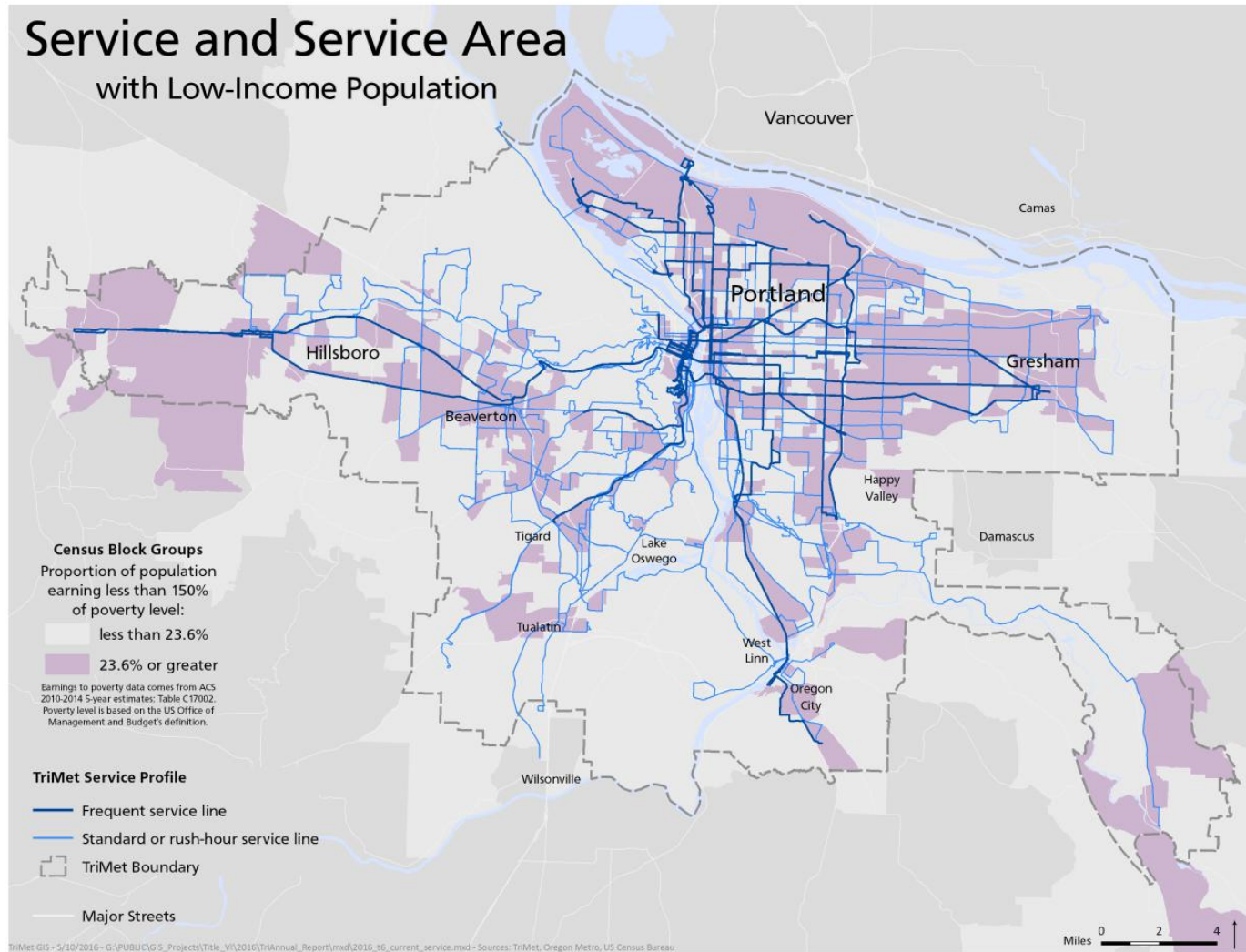


FIGURE V-3: SERVICE AND SERVICE AREA WITH LOW-INCOME POPULATION

Limited English Proficient (LEP) Population Distribution in Figure V-4 depicts the TriMet 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 (8.7 percent). 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.

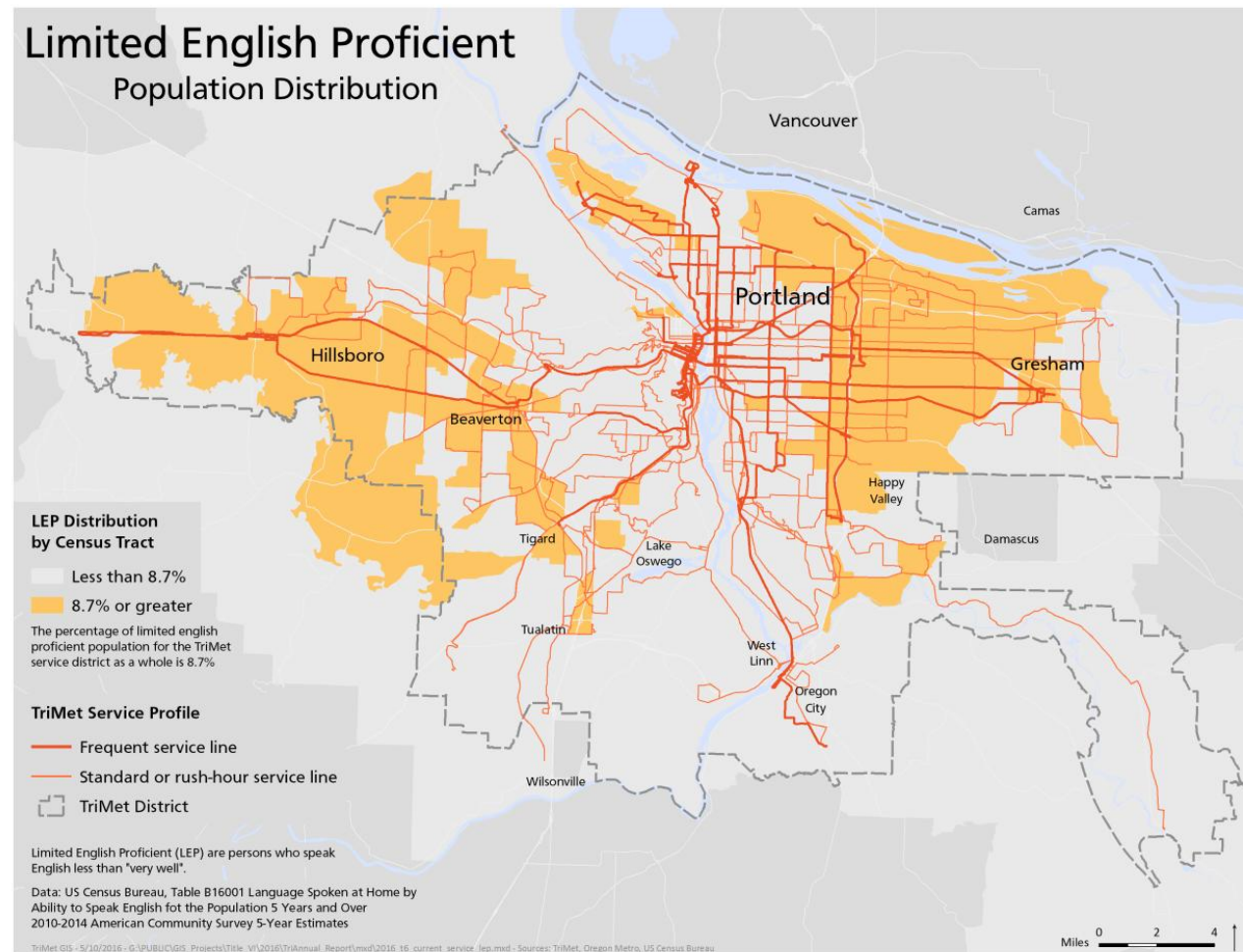


FIGURE V-4: SERVICE AND SERVICE AREA WITH LIMITED ENGLISH PROFICIENT DISTRIBUTION

PROXIMITY TO SERVICE

TriMet performed a demographic analysis of proximity to TriMet Service. The information in Table V-1 on the next page shows population counts and percentages of those within one-half mile of service by race/ethnicity and low-income. This is also delineated by type of service, i.e. bus, MAX, and WES; and Frequent Service bus and MAX.

Of note, a greater percentage of minorities and low-income populations are located within one-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, the Hispanic population makes up the largest share of minority population served.

TABLE V-1: DEMOGRAPHIC ANALYSIS OF PROXIMITY TO TRIMET SERVICE

Demographic Analysis of Proximity to TriMet Service (Percent)		TM District		Percent within 1/2* Mile of...			Frequent Service	
		Totals (Raw Number)	Totals (Pct.)	Bus	MAX	WES	Bus	Bus & MAX
Population	Total (ACS 5 year estimate, 2010-1014)	1,526,154	100.0%	88.4%	16.1%	0.8%	41.6%	47.5%
Minority	All Minorities	426,154	27.9%	90.6%	19.8%	1.1%	44.3%	52.5%
	Black (non-Hispanic)	52,529	3.4%	96.1%	23.3%	0.3%	59.4%	68.7%
	Hispanic	188,244	12.3%	91.8%	21.2%	1.9%	45.8%	55.0%
	Asian (non-Hispanic)	112,128	7.3%	86.6%	17.9%	0.4%	35.4%	42.4%
	Native American (non-Hispanic)	8,263	0.5%	90.5%	18.2%	0.8%	45.8%	53.0%
	Hawaiian Native and Pacific Islander (non-Hispanic)	7,490	0.5%	95.2%	17.4%	0.6%	40.9%	52.6%
	Other (Including Mixed Race, non-Hispanic)	57,500	3.8%	88.7%	16.7%	0.7%	42.7%	48.8%
Non-Minority	White (Non-Hispanic)	1,100,000	72.1%	87.6%	14.7%	0.7%	40.5%	45.6%
Population	Total population with known income (ACS 5 year estimate, 2010-1014)**	1,503,387	100%	88.3%	16.0%	0.8%	41.3%	47.3%
Income	Below 150% of Poverty Level	354,758	23.6%	93.5%	22.7%	1.3%	51.9%	59.9%

Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Tables: 2010 - 2014 (5-Year Estimates)
 Populations of block groups that are only partially within the TriMet district were adjusted using residential address points from the Oregon Metro Master Address File.

* Distance calculations based on May 2016 stop and station locations.

** Population totals for the TriMet district vary between between statistics for race and income/poverty because the ACS total excludes those whom poverty status is not determined.

RIDERSHIP CHARACTERISTICS AND DEMOGRAPHICS (TRIP BASED)

TriMet Rider Trip Characteristics and Demographic data presented in Attachment P used the TriMet 2016 Fare Survey data to provide a snapshot of weekday trips⁵ made by riders in terms of race/ethnicity, household income, and Limited English Proficiency (LEP).

The majority of weekday trips on TriMet (63%) are made by white non-Hispanic riders; however, the percentage of trips made by minority riders (37%) is greater than the proportion of the TriMet service district's population that minorities represent (28%). Additionally, minority trips increased by ten percentage points from the last Fare Survey in 2012.

About 42% of trips on TriMet are made by low-income riders, which TriMet defines for the purposes of Title VI as those living in households with incomes at or below 150% of the Federal

Poverty Level. This is much greater than the proportion of the TriMet service district's population low-income persons represent (23%).

Of those who took the Fare Survey in Spanish (entire survey available) or ten other languages (two questions available)⁶, few speak English very well (2%-3%), with the

Trips by race/ethnicity
2016 Fare Survey

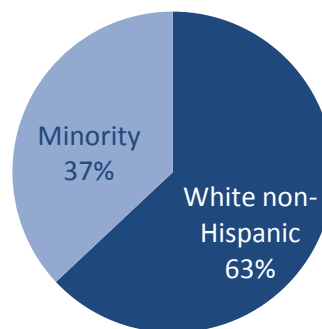


FIGURE V-5: TRIPS BY RACE/ETHNICITY

Trips by income
2016 Fare Survey

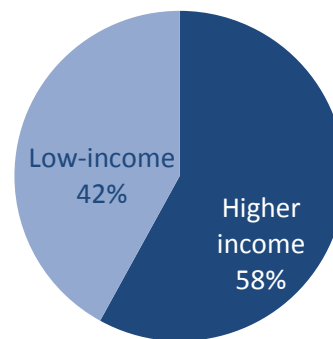


FIGURE V-6: TRIPS BY INCOME

⁵ Data for weekend trips was also collected, but was not ready for reporting in time for this submittal.

⁶ If riders indicated that they spoke neither English nor Spanish, they were asked to identify which language they spoke from a menu. They were then asked in their selected language how well they spoke English.

rest meeting the definition of limited English proficiency, or LEP. The most common languages selected by those who indicated they were not comfortable taking the survey in English were Chinese, Russian, Vietnamese, and Arabic.

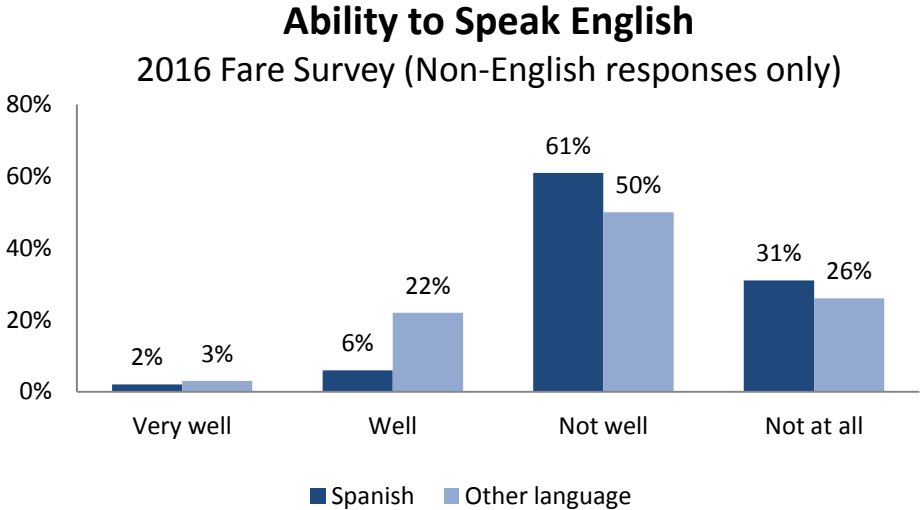


FIGURE V-7 ABILITY TO SPEAK ENGLISH

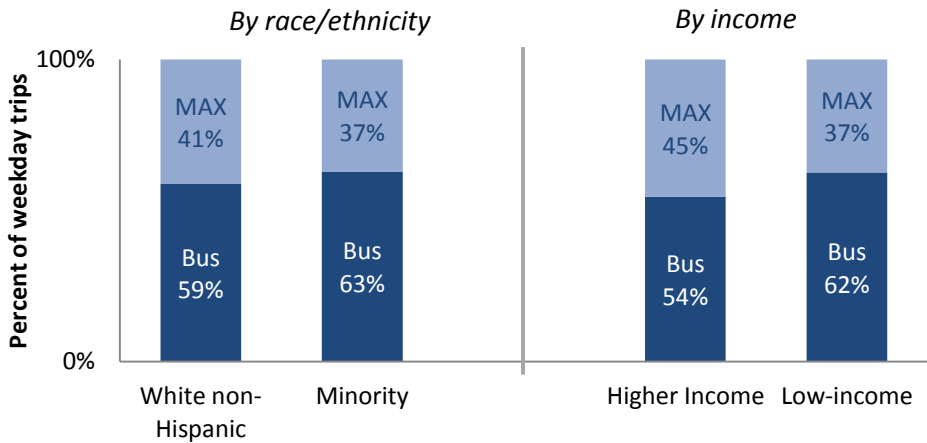
Trip Characteristics by Race/Ethnicity and income

Trip Characteristics by race/ethnicity and income also used data from TriMet’s 2016 system-wide on-board Fare Survey. This was a survey of 10% of vehicle trips for bus and MAX light rail routes and a 50% sample of WES commuter rail vehicle trips. Reported differences called out on the following pages meet the standard of statistical significance at the 95% confidence level.

Vehicle Modes used (Bus, MAX, WES)

Across all groups, the majority of trips are made by TriMet bus. However, both minority and low-income riders take a higher proportion of trips on bus and smaller proportion of trips on MAX light rail than non-minority and higher income riders. WES commuter rail trips comprise less than 1% of trips for all groups.

Vehicle Mode 2016 Fare Survey



Note: Trips on WES represent <1% for all groups

FIGURE V-8: VEHICLE MODES USED BY RACE/ETHNICITY AND INCOME

Ridership by time of day

Time of day comparisons show a greater proportion of trips made midday for minority riders (51%) compared to white non-Hispanic riders (47%). On the other hand, white non-Hispanic riders take a greater portion of their trips during the morning and afternoon peaks (31%) compared to minority riders (27%).

Differences are even greater between low-income and higher income rider trips. Compared to higher income riders, low-income riders take a greater portion of trips during the midday and evening/night, and a smaller portion during early AM and peaks.

Ridership by Time of Day 2016 Fare Survey

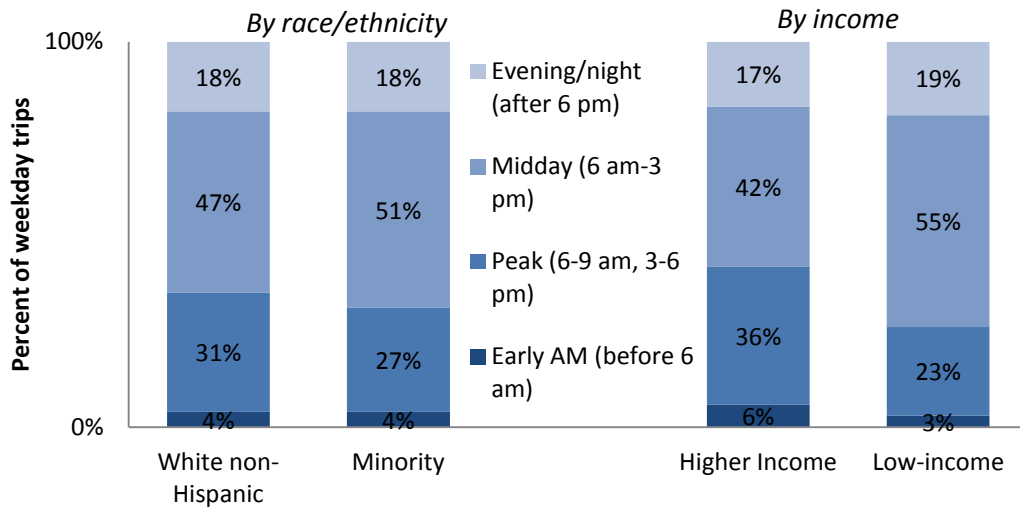


FIGURE V-9: RIDERSHIP BY TIME OF DAY BY RACE/ETHNICITY AND INCOME

Transfers

Most trips on TriMet do not involve a transfer. In other words, the majority of riders enjoy a one-seat ride to complete their one-way trips. However, nearly one-third of trips taken by minority riders include a transfer - higher than the 27% of trips made by white non-Hispanic riders which include a transfer. Trips made by low-income riders are more likely to include a transfer than trips taken by higher income riders (33% vs. 24%, respectively).

Does your trip require a transfer? 2016 Fare Survey

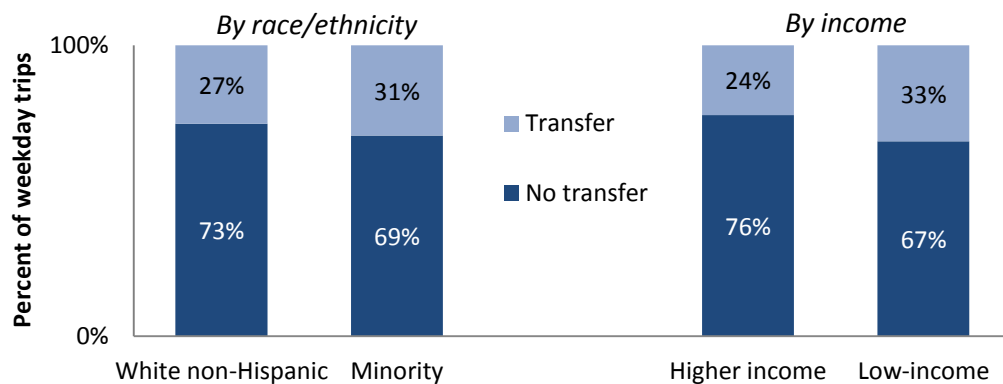


FIGURE V-10: TRANSFER ACTIVITY BY RACE/ETHNICITY AND INCOME

Frequency of Riding TriMet

The number of times respondents rode TriMet in the last week (multiplied to month-level ridership) showed no difference between race/ethnicity groups. On the other hand, trips made by low-income riders were somewhat more likely to be “frequent” (i.e. almost every day) and somewhat less likely to be “occasional” (i.e. a couple of times a month) as compared to higher income riders.

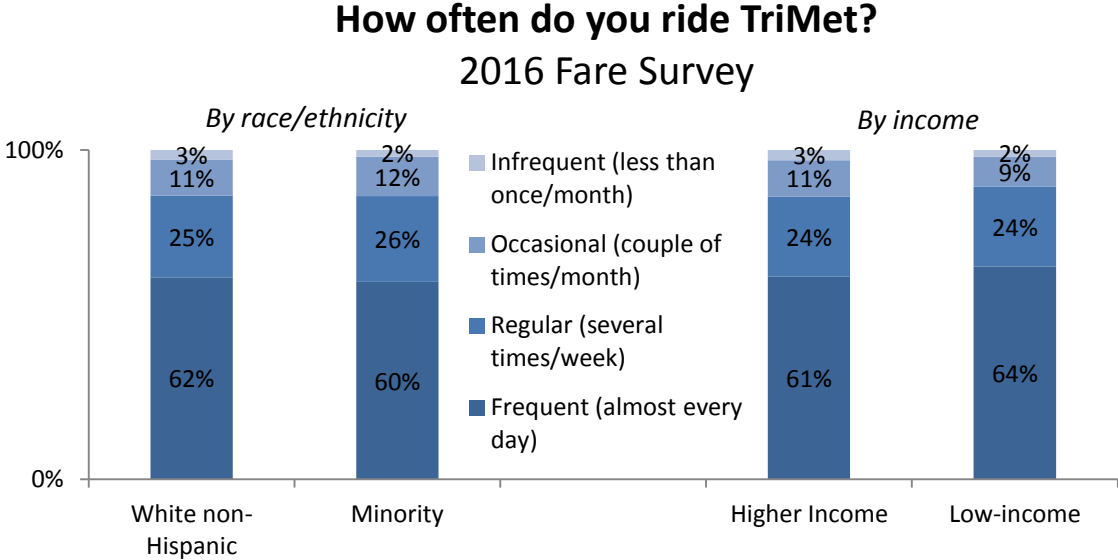


FIGURE V-11: FREQUENCY OF RIDING TRIMET BY RACE/ETHNICITY AND INCOME

Transit-dependency

In order to explore transportation options available to TriMet riders, respondents were asked if they normally have a car available for their use, either as the driver or as a passenger, not including carshare services like Zipcar or Car2Go. About half of white rider responses and 61% of higher income rider responses indicated that they did normally have a car available. This was higher than the 40% of minority rider responses and 28% of low-income rider responses indicating they had access to a car.

Do you normally have access to a car?

2016 Fare Survey

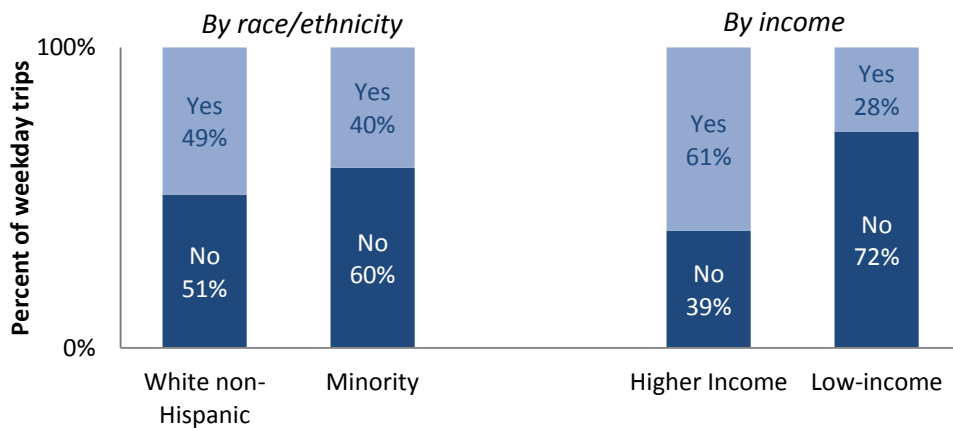


FIGURE V-12: PERSONAL VEHICLE ACCESS BY RACE/ETHNICITY AND INCOME

Fare Payment

Fare payment by race/ethnicity is shown in Figure V-13. Fare payment appears similar comparing minority and white non-Hispanic trips, with the exception of single 2.5-hour tickets, which are somewhat more common for trips taken by minority riders.

How did you pay your fare?

Comparison by race/ethnicity

2016 Fare Survey

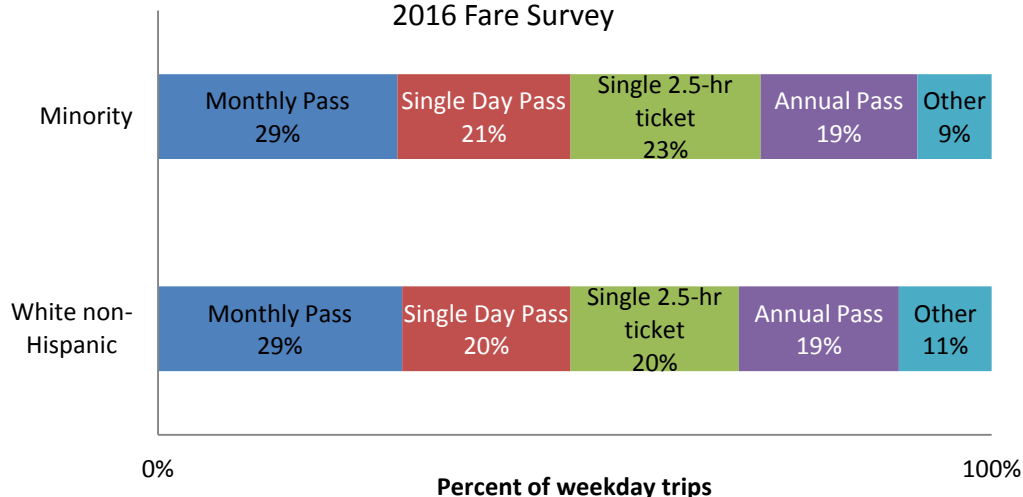


FIGURE V-13: FARE PAYMENT TYPE BY RACE/ETHNICITY

Fare payment comparisons between low-income and higher income riders reveal several differences, as shown in Figure V-14. Compared to fares paid by higher

income riders, low-income fares are more likely to be paid using a monthly pass, a single day pass, or a single 2.5-hour ticket. Nearly one-quarter (22%) of trips taken by higher income riders are paid for using an annual pass, most of which are obtained through employers.

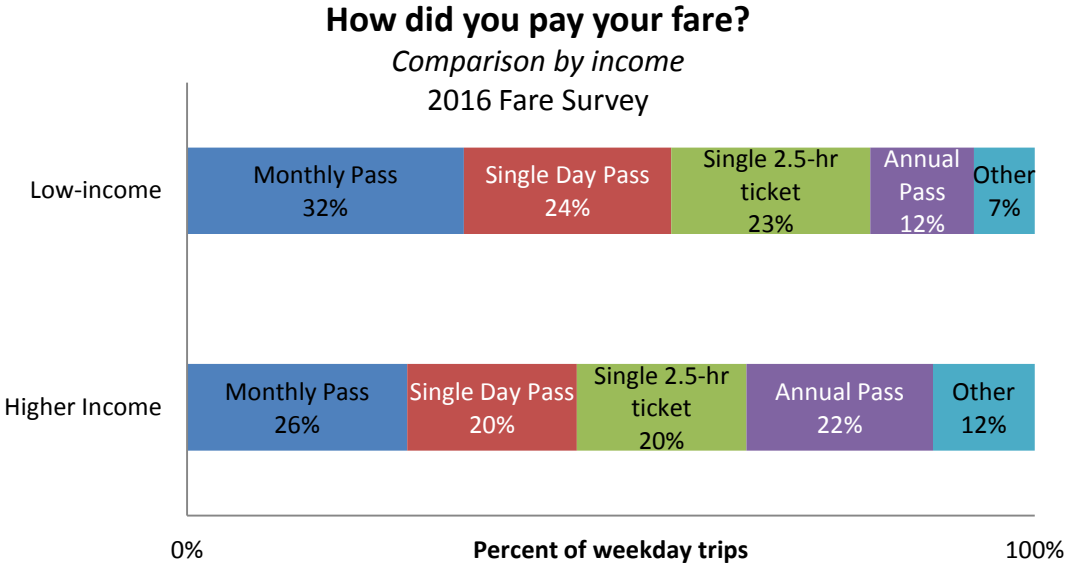


FIGURE V-14: FARE PAYMENT TYPE BY INCOME

In addition to the differences noted above are the following findings about fare payment patterns:

Minority vs. White non-Hispanic

1. White non-Hispanic trips were more commonly paid for using tickets from ticket books (both single fare and day pass ticket books) compared to minority trips.
2. Fares paid by minority riders are more commonly Youth, and less commonly Adult or Honored Citizen compared to non-minorities.
3. Fares purchased by minority riders are more likely to be obtained at a ticket vending machine, on-board the vehicle, or at school than fares purchased by white non-Hispanic riders.

Low-income vs. Higher Income

1. Higher income trips were more commonly paid for using tickets from ticket books (both single fare and day pass ticket books) compared to low-income trips.
2. Fares paid by low-income riders are more commonly Youth or Honored Citizen, and less commonly Adult compared to higher income riders.

- Fares used by low-income riders are more likely to be obtained on-board the vehicle, at school, at a retail store, or through a social service agency than fares used by higher income riders.

Age

According to the Fare Survey there are some age differences between groups. While 7% of white non-Hispanic trips are taken by youth under age 18, 18% of minority trips are taken by youth. Young adults ages 18 to 24 also comprise a higher portion of minority trips than white non-Hispanic trips (24% vs 17%, respectively). On the other hand, a greater portion of white non-Hispanic trips are taken by every age group 25 and above.

Riders under age 24 also make up a greater portion of low-income trips compared to higher income trips, while riders 25 and older make up a smaller portion

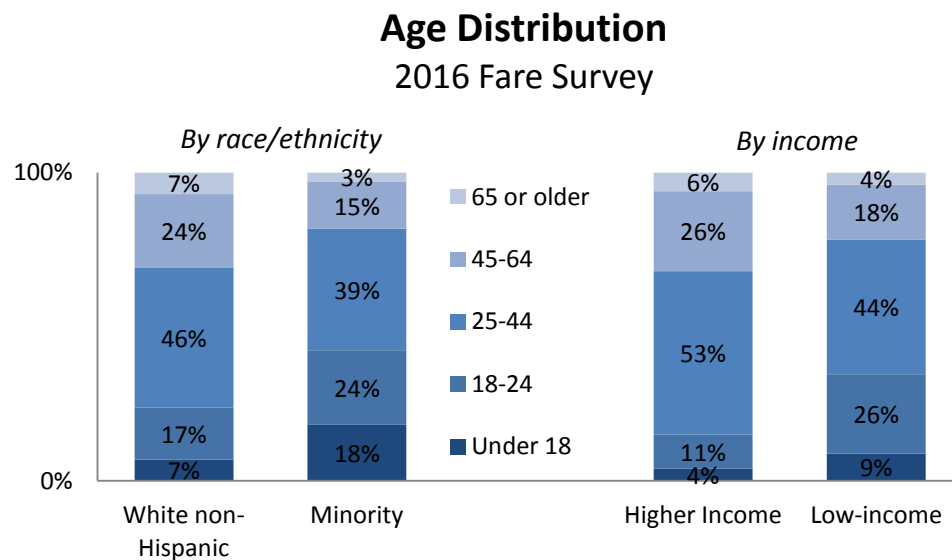


FIGURE V-15: AGE DISTRIBUTION BY RACE/ETHNICITY AND INCOME

Future Surveys

TriMet’s intention for surveying passengers is to conduct the Fare Survey every two years. This on-board survey will consist of an approximate 10% sample of trips on all vehicle types. The survey will be translated in full into Spanish since that is by far the foreign language spoken most often in the TriMet Service District. In addition some LEP questions will be translated into other languages, as was done in 2016. Data collected will be similar to the 2016 Fare Survey, i.e., transfer rate, routes transferred to/from, ridership information, fare payment information, and demographics.

The TriMet Attitude & Awareness telephone survey of people ages 16+ in the TriMet Service District is conducted every year or every two years as needed. Sample sizes

will be large enough for a 95% confidence level with a margin of error of between +/- 2% to +/- 4%. The survey is conducted in English and Spanish with both riders and non-riders. Respondents rate TriMet's service and performance, tell about their ridership behavior, give opinions on new projects, and provide demographic information.

FACILITIES

Three maps (Figures V-16, V-17, and V-18) 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 recently⁷ replaced, improved⁸, or ;
2. Have improvements that 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-16, Recent, In Progress, and Planned Facilities is organized by facility type. The improvements shown include the following:

Recently Completed

- Two storage and maintenance facility improvements
- One new MAX light rail line
- 14 MAX light rail station improvements
- 4 major bus stop improvements

In Progress and Planned

- Two Park & Ride improvements
- Three storage and maintenance facility improvements
- One new MAX light rail line
- One new high capacity bus corridor
- 42 MAX light rail station improvements

Two planned improvements – labeled as “SW Light Rail Corridor” and “High Capacity Bus Corridor” – do not have final alignments determined as of this submittal, but the map indicates the current options being considered.

⁷ Recently means since the prior Title VI program submittal in 2013

⁸ Replacement and improvement excludes maintenance activities.

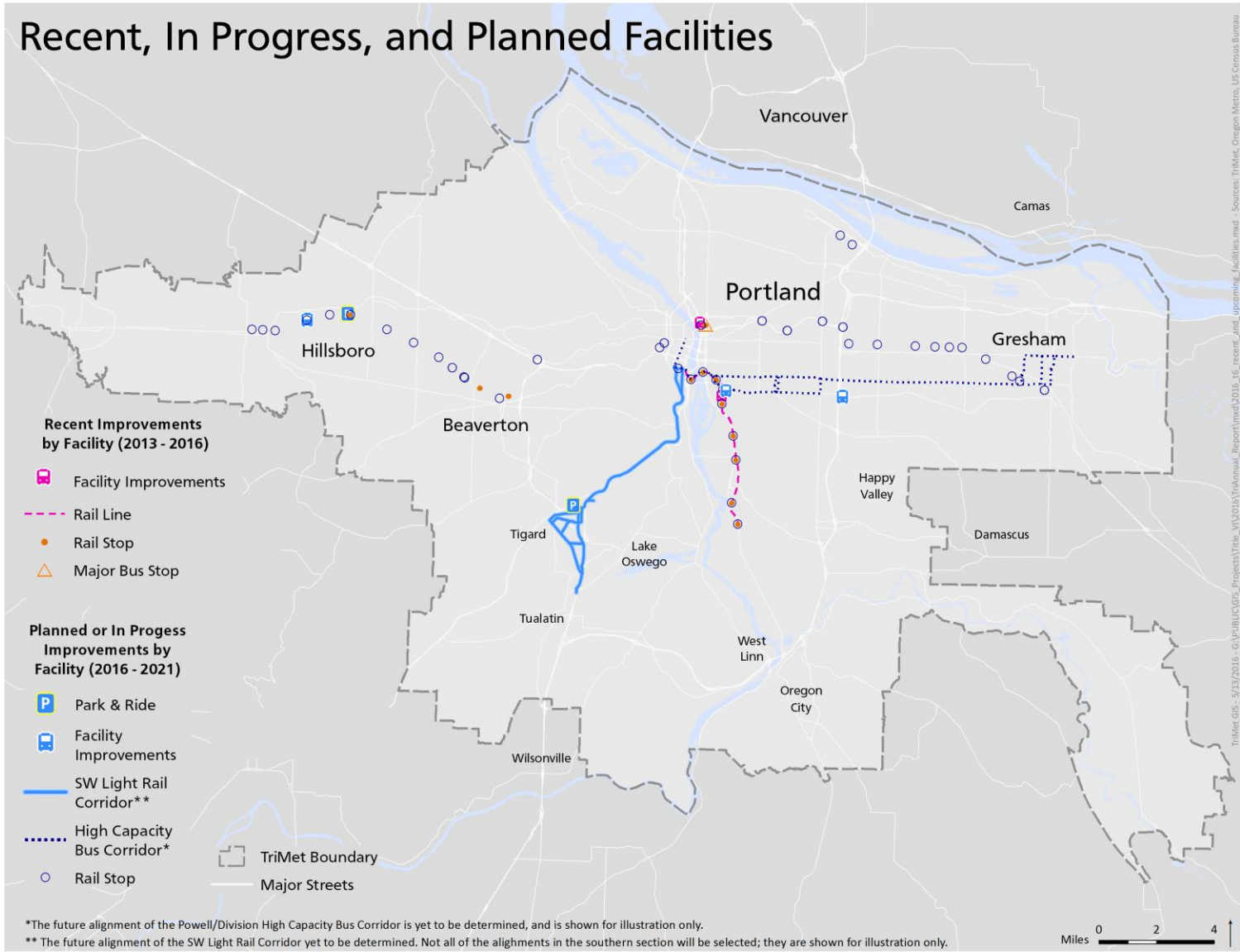


FIGURE V-16: RECENT, IN PROGRESS, AND PLANNED FACILITIES

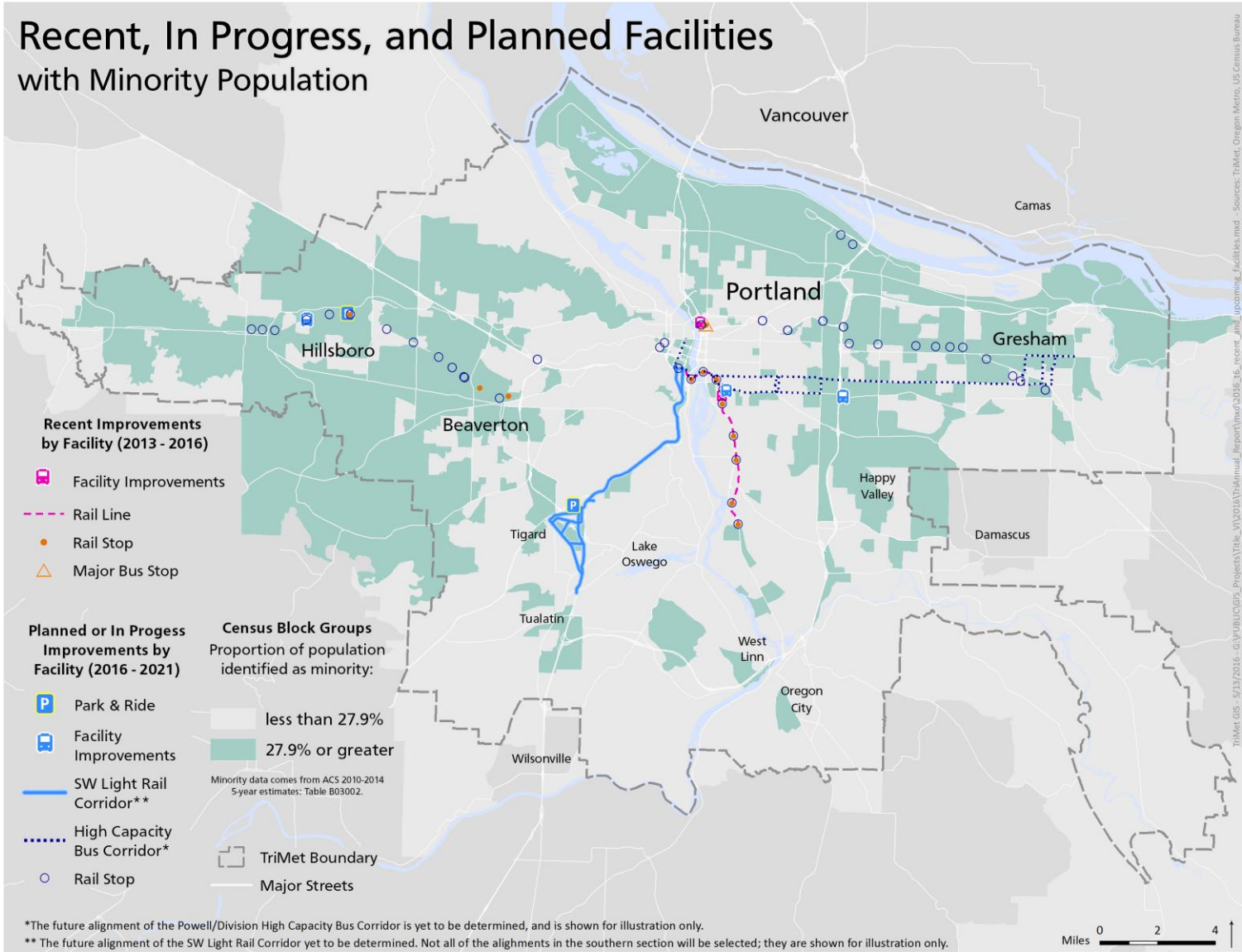


FIGURE V-17: RECENT, IN PROGRESS, AND PLANNED FACILITIES WITH MINORITY POPULATION

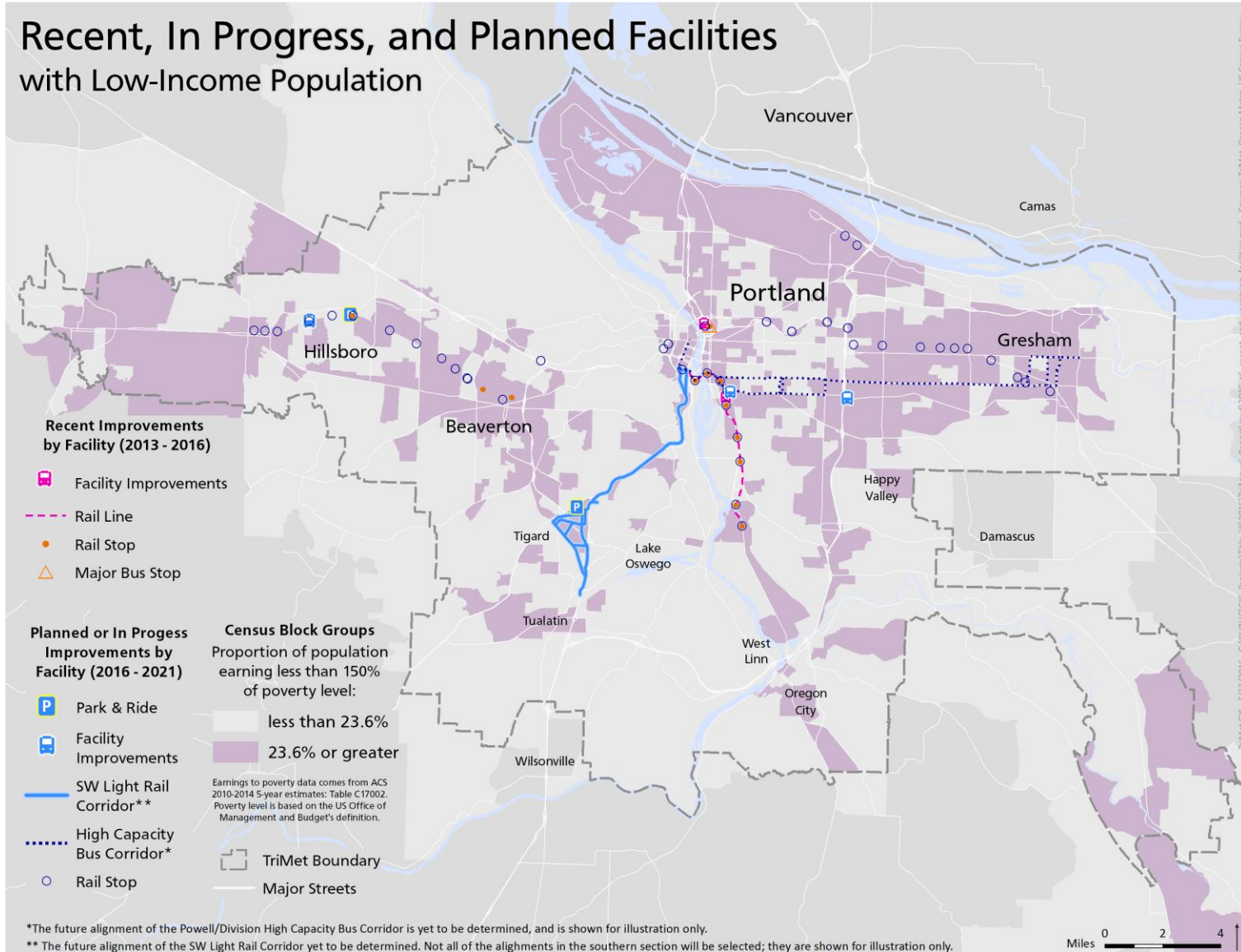


FIGURE V-18: RECENT, IN PROGRESS, AND PLANNED FACILITIES WITH LOW-INCOME POPULATION

Figure V-19 shows the location of **existing facilities** in relation to Frequent Service lines (all five MAX light rail lines and 12 Frequent Service bus lines). Facilities are depicted by type: administrative, operations/maintenance, park & ride, and transit centers.

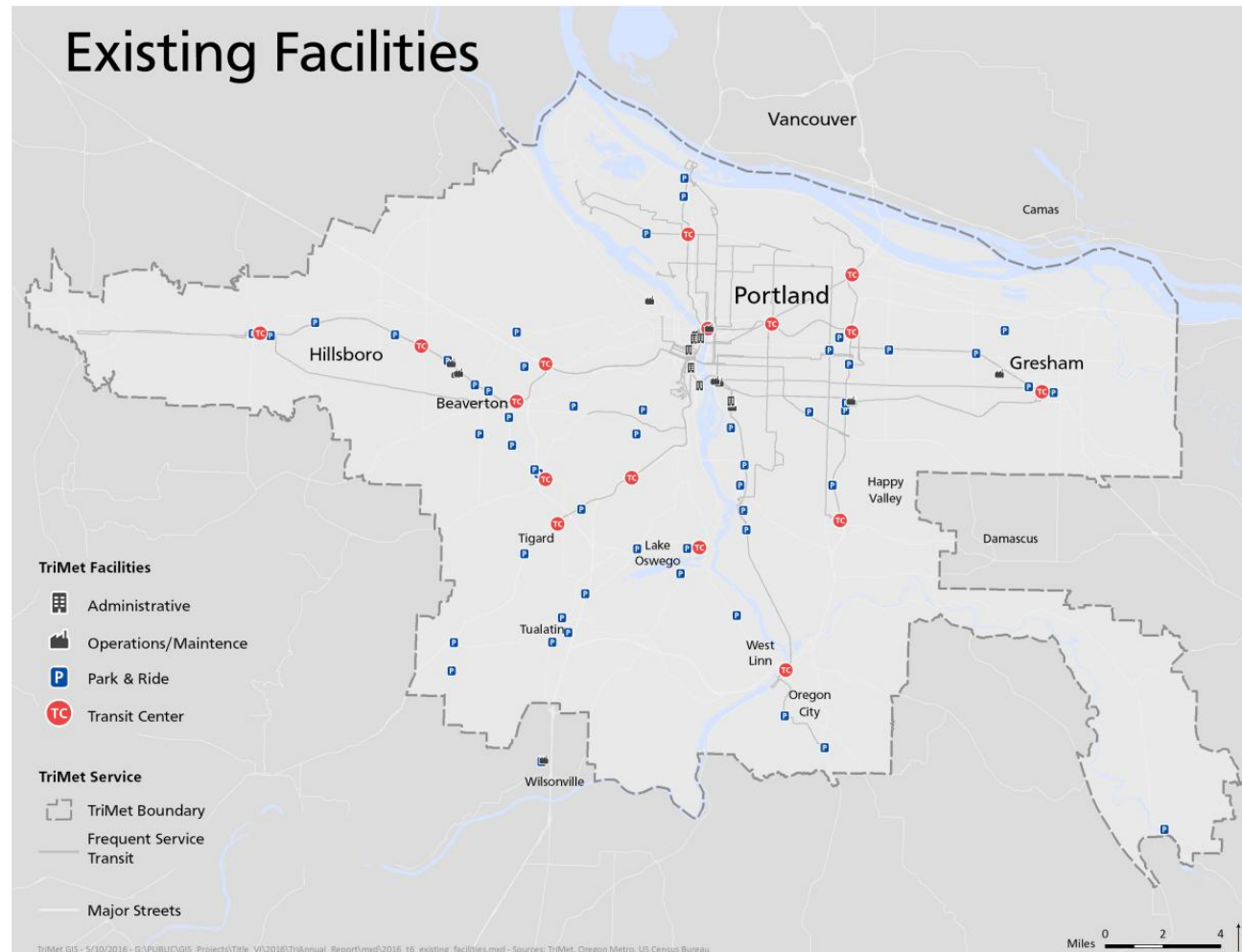


FIGURE V-19: EXISTING FACILITIES

Figure V-20 **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 (27.9 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.

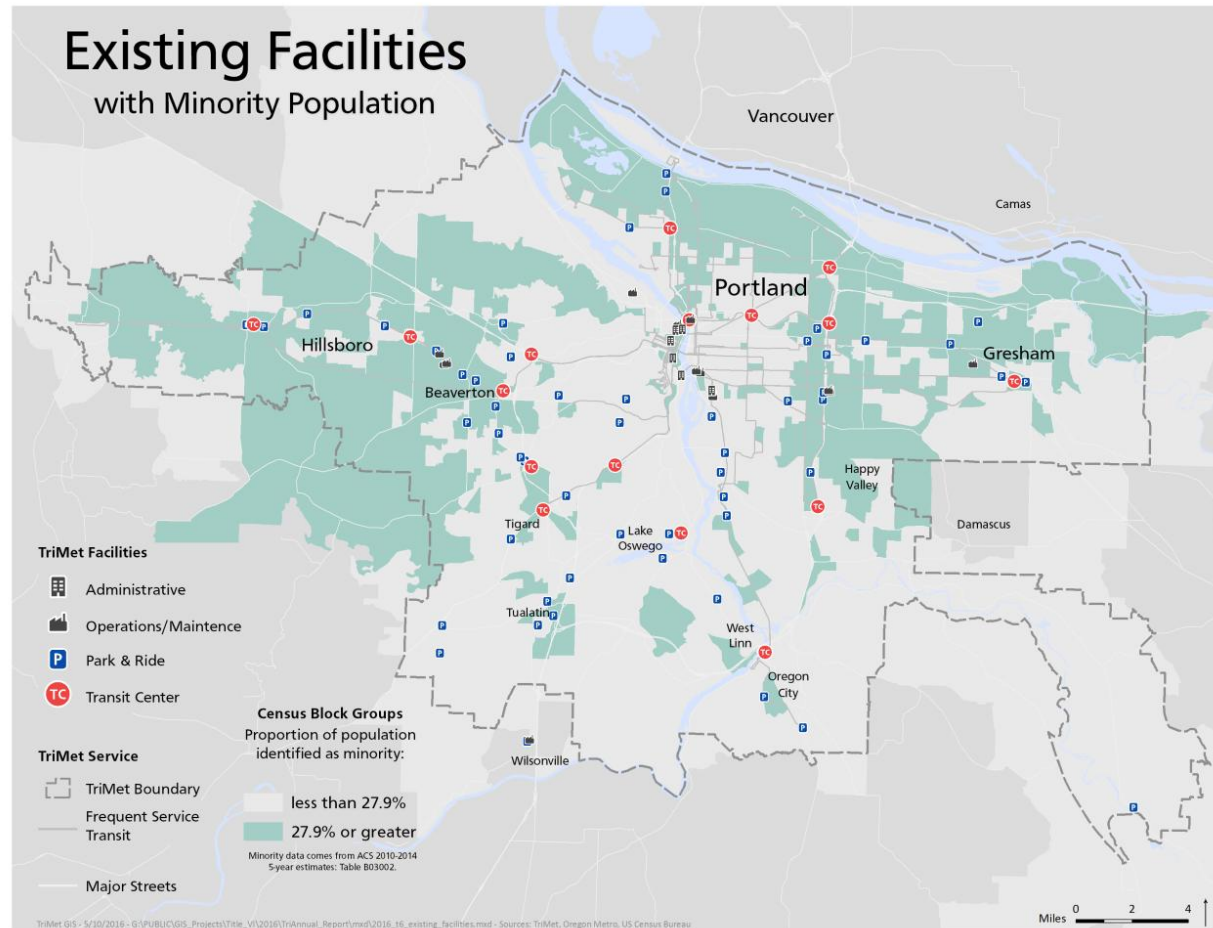


FIGURE V-20: EXISTING FACILITIES WITH MINORITY POPULATION

Figure V-21 **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 (23.6% or greater). Facilities are depicted by type:

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.

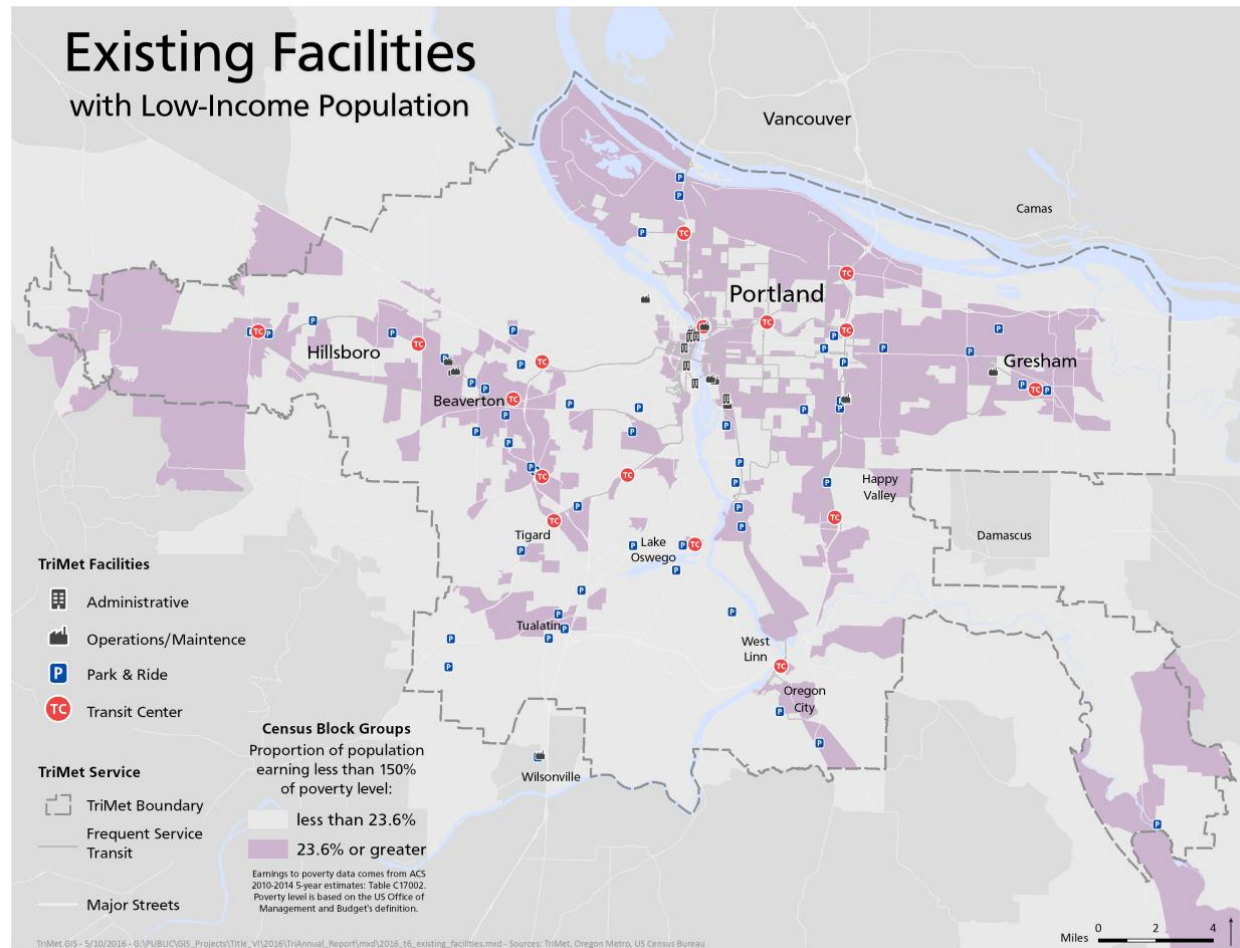


FIGURE V-21: EXISTING FACILITIES WITH LOW-INCOME POPULATION

dispersed along major rail and bus service corridors and are typically five miles or more from the Portland City Center.

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-22 Amenity Distribution: Seating
- Figure V-23 Amenity Distribution: Digital Displays
- Figure V-24 Amenity Distribution: Elevators
- Figure V-25 Amenity Distribution: Shelters
- Figure V-26 Amenity Distribution: Signs, Maps, and/or Schedules
- Figure V-27 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.

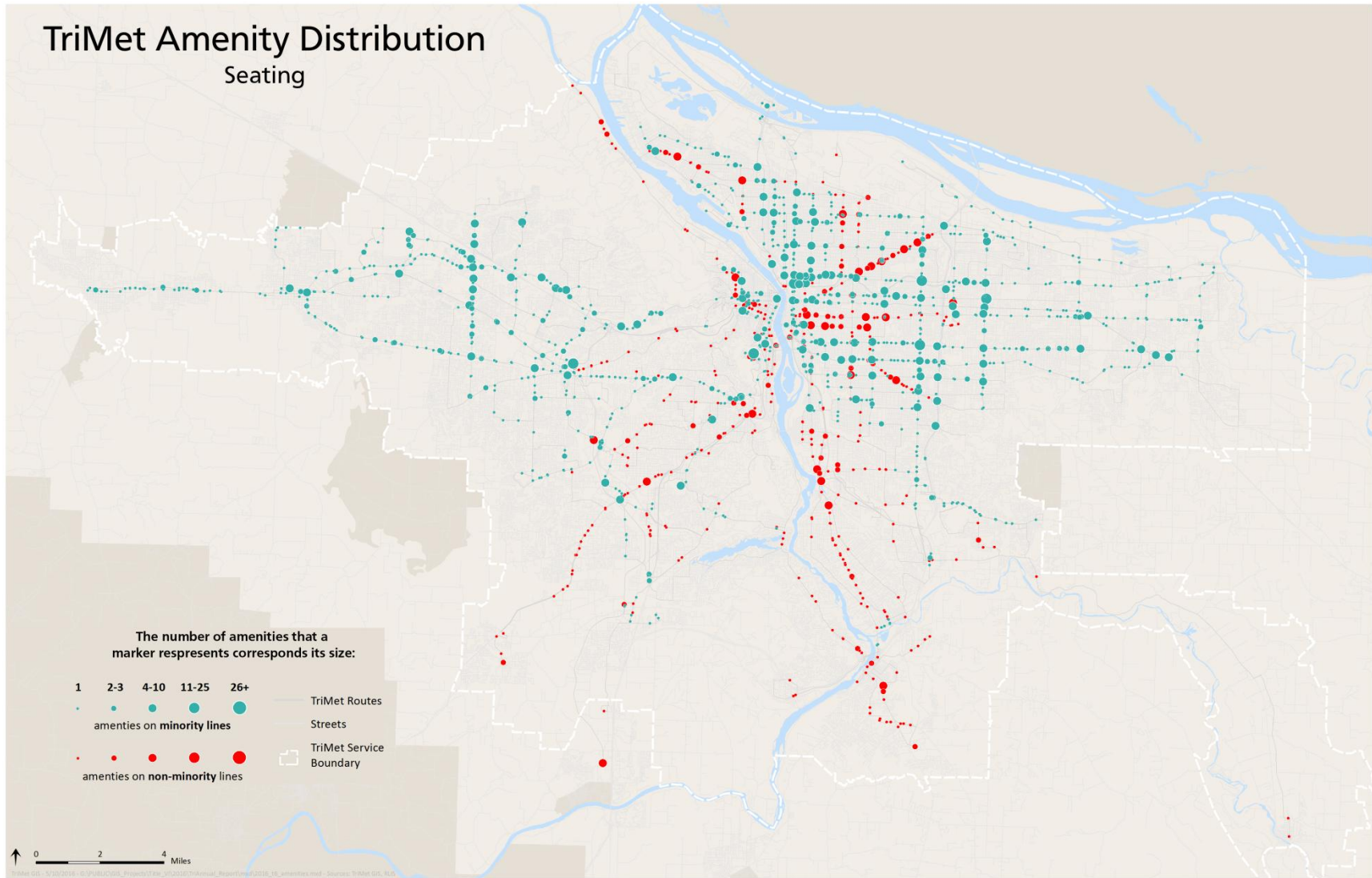


FIGURE V-22 AMENITY DISTRIBUTION: SEATING

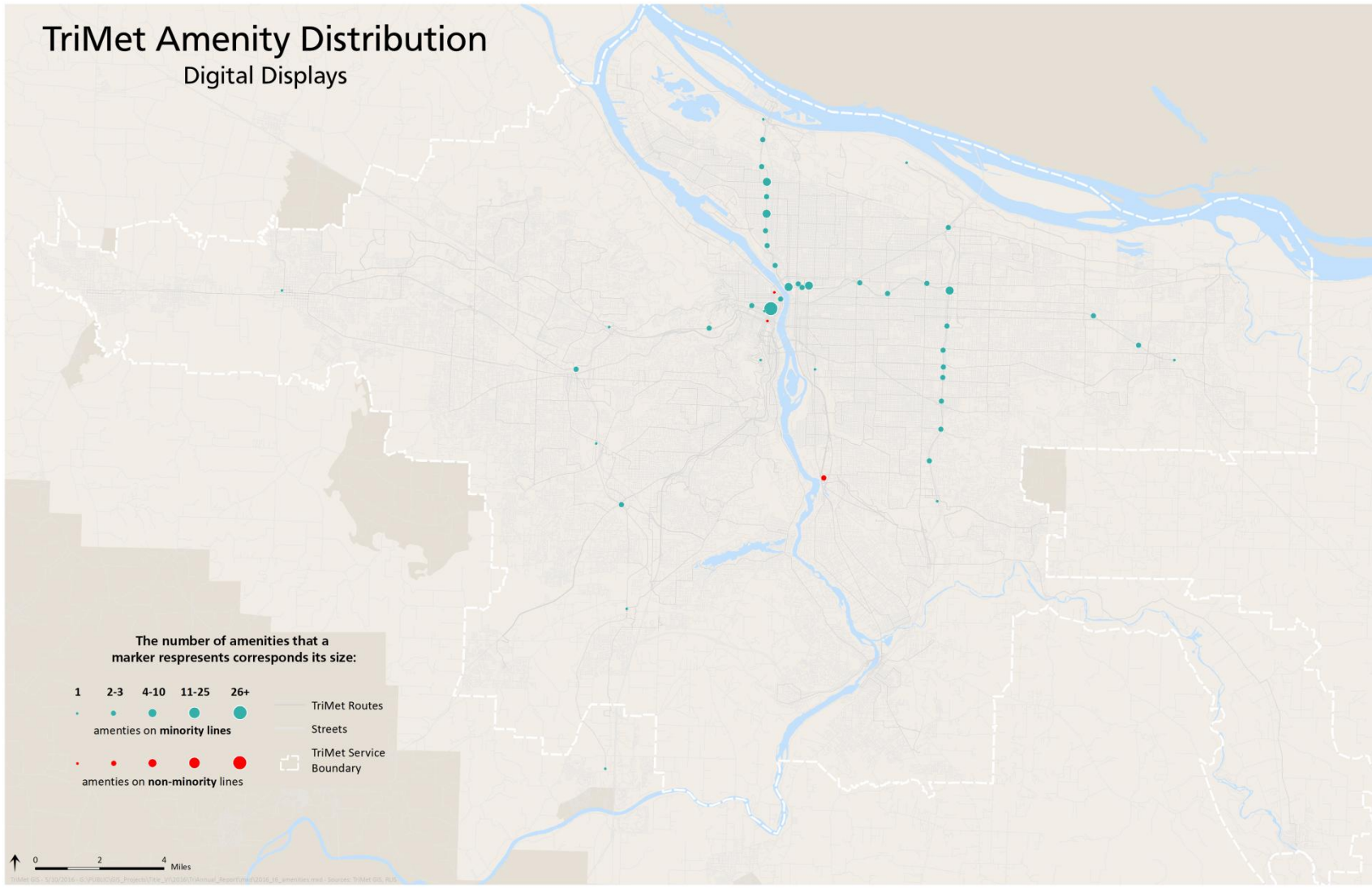


FIGURE V-23 AMENITY DISTRIBUTION: DIGITAL DISPLAYS

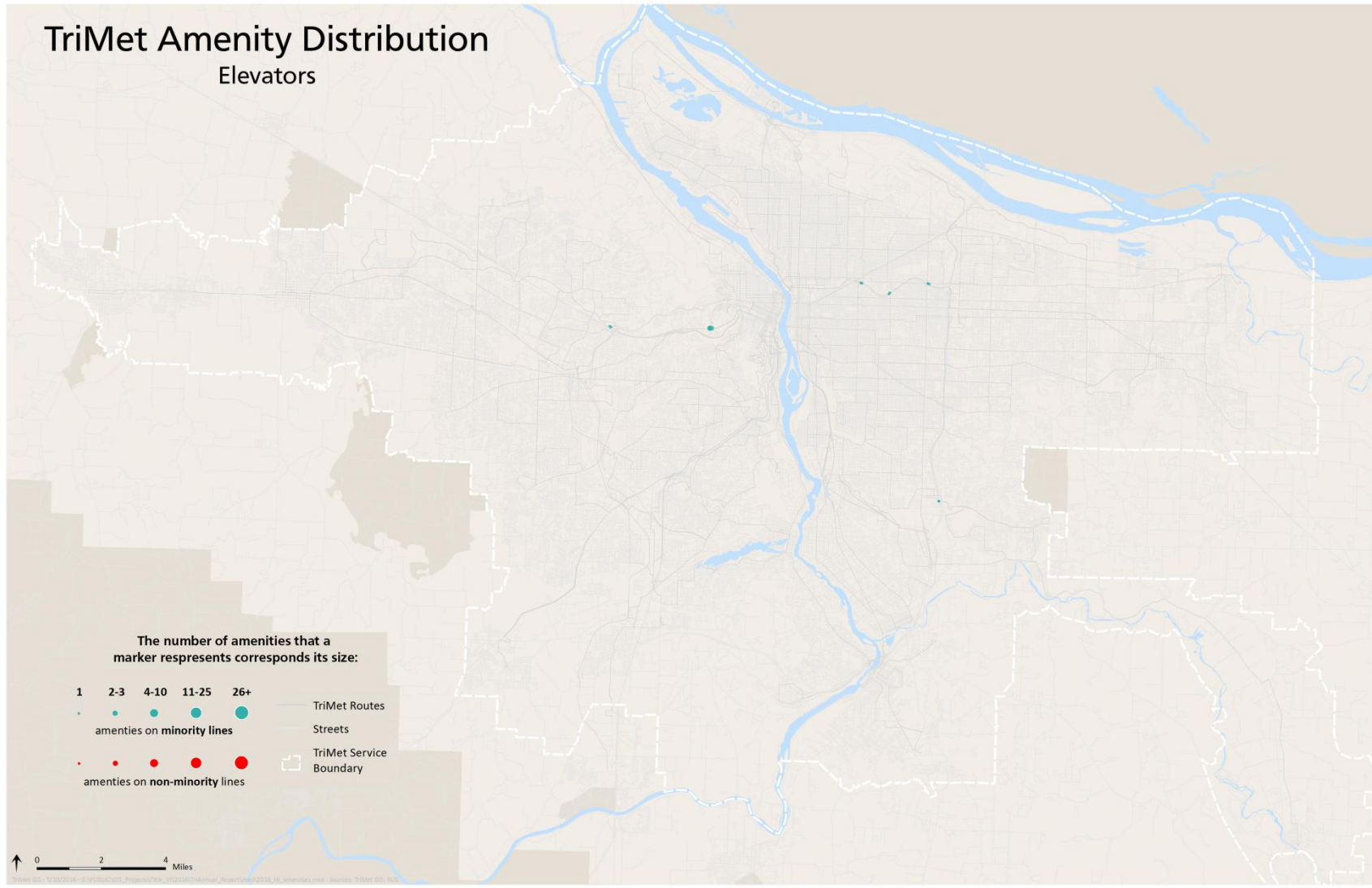


FIGURE V-24 AMENITY DISTRIBUTION: ELEVATORS

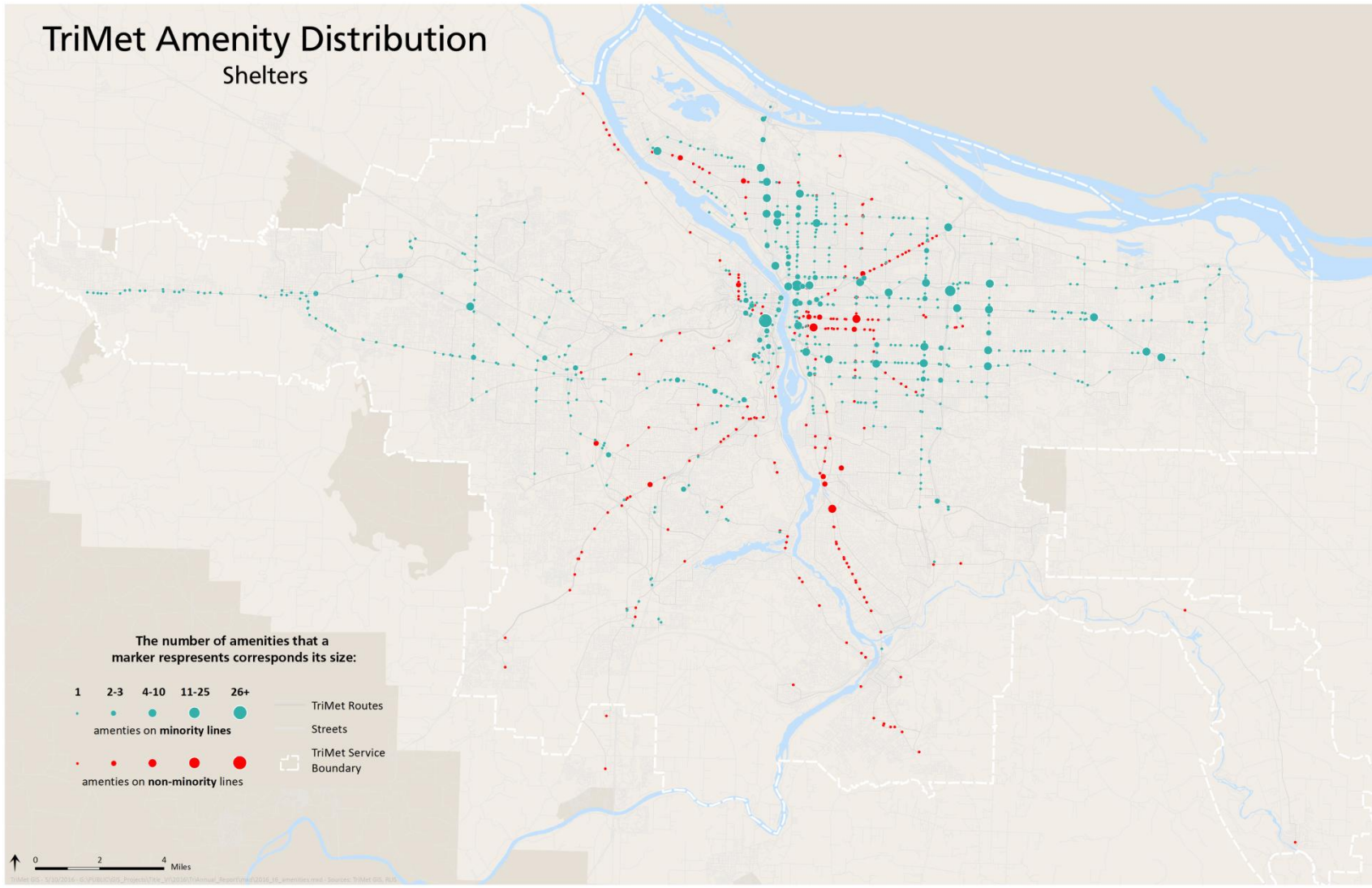


FIGURE V-25 AMENITY DISTRIBUTION: SHELTERS

TriMet Amenity Distribution

Signs, Maps, and/or Schedules

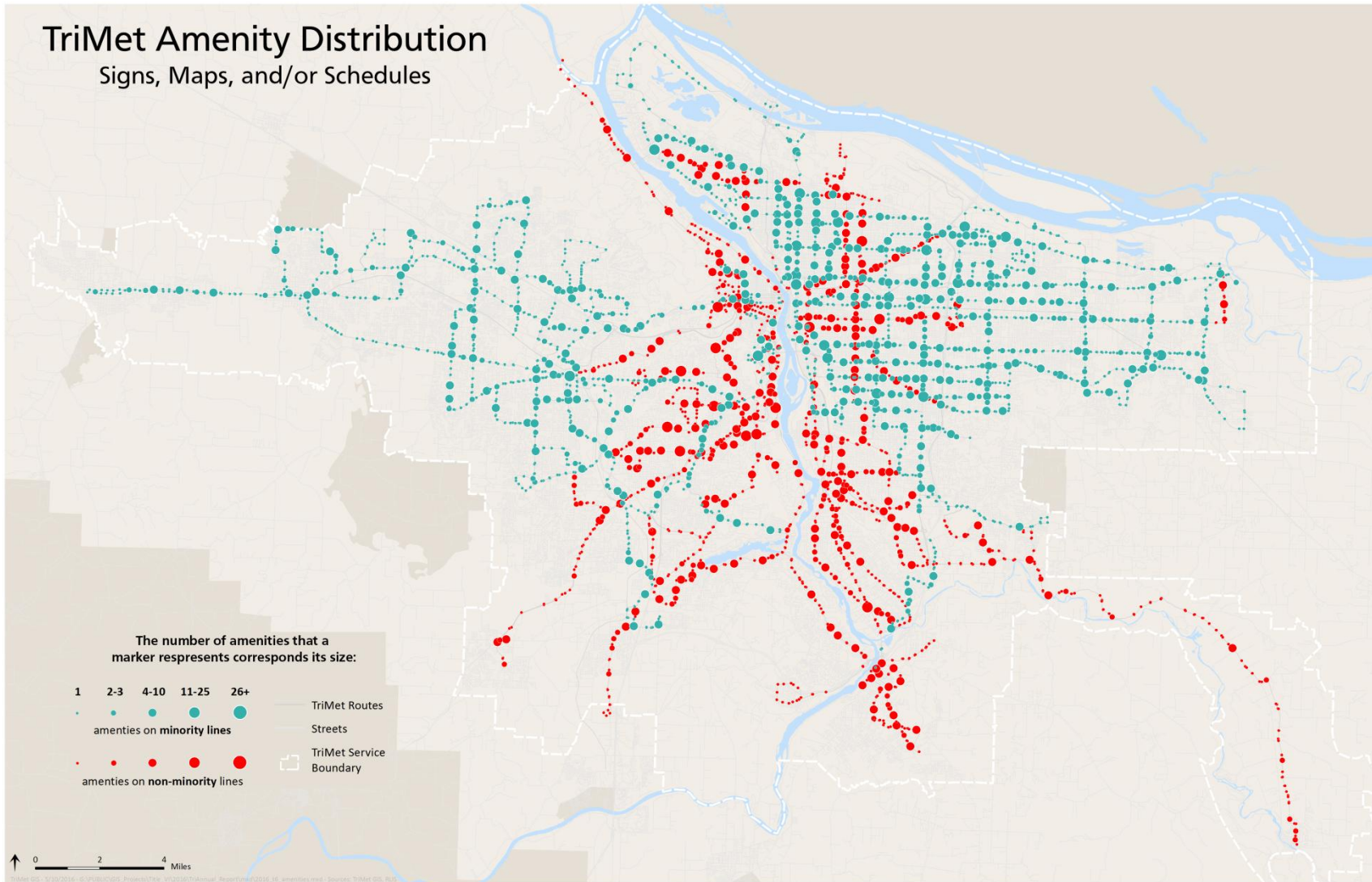


FIGURE V-26 AMENITY DISTRIBUTION: SIGNS, MAPS, AND/OR SCHEDULES

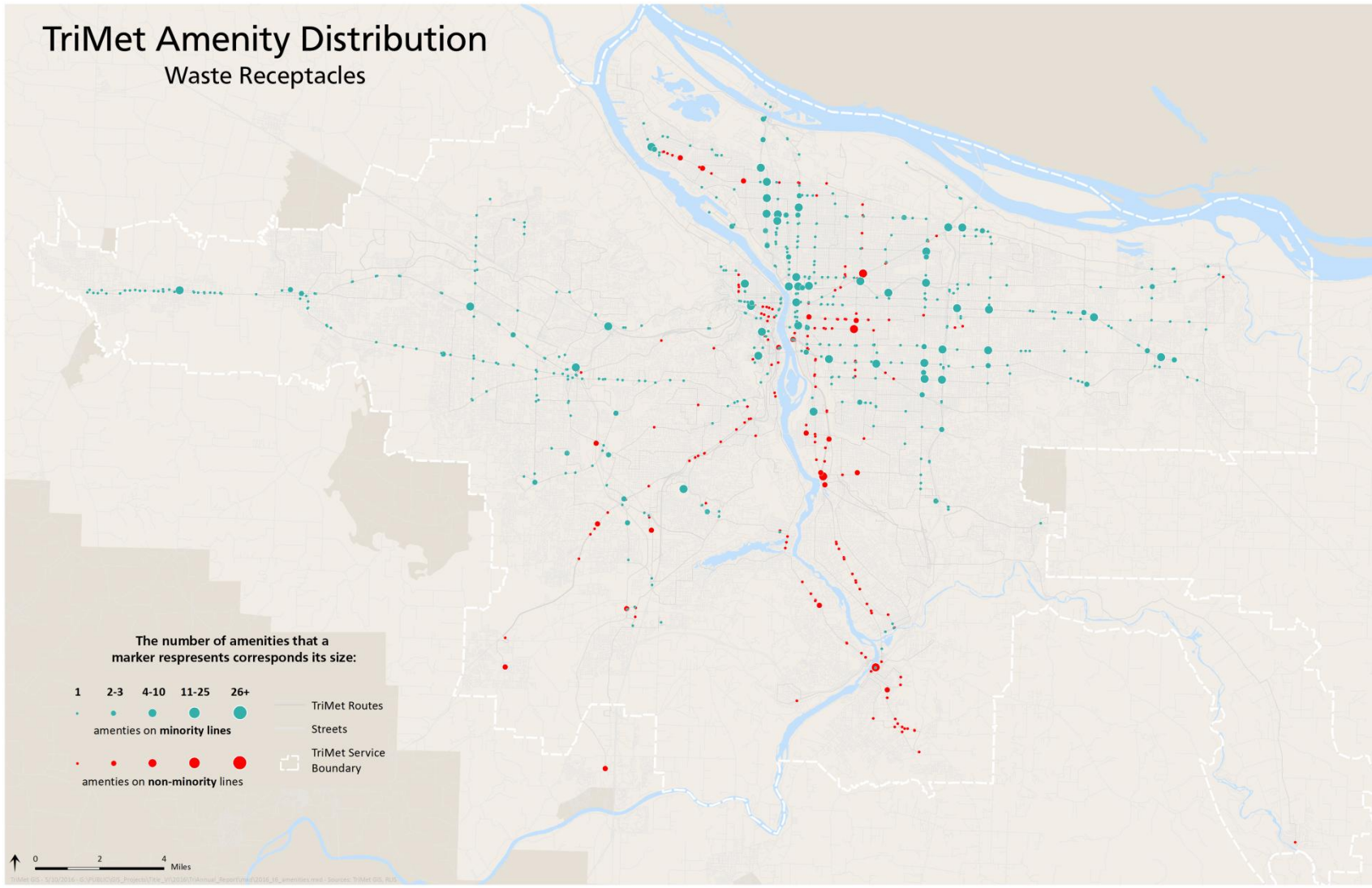


FIGURE V-27 AMENITY DISTRIBUTION: WASTE RECEPTACLES

Attachments

- A:** TriMet Board Resolution 16-09-60 Approving TriMet's Title VI Program and Policies
- B:** TriMet Title VI Complaint Form
- C:** TriMet Title VI Vehicle Notice
- D:** TriMet Public Engagement Framework
- E:** LEP Access Plan & Implementation Schedule
- F:** Portland Public Schools ESL Program Information – 2015
- G:** LIFT Facility Relocation Equity Analysis
- H:** Fall 2014 Fare and Service Change Equity Analysis, with Documentation of Board Approval
- I:** Ordinance 332 Transfer Policy Change Fare Equity Analysis, with Documentation of Board Approval
- J:** Weekend Frequent Service Restoration Equity Analysis, with Documentation of Board Approval
- K:** MAX Orange Line Startup Equity Analysis, with Documentation of Board Approval
- L:** Honored Citizen Fare Increase Equity Analysis, with Documentation of Board Approval
- M:** Title VI Fare Equity Analysis for Migration to E-Fare, with Documentation of Board Approval
- N:** Spring 2016 – Spring 2017 Service Equity Analysis, with Documentation of Board Approval
- O:** TriMet Service Guidelines Policy
- P:** Data from 2016 On-board Fare Survey
- Q:** Outreach materials for 2016 Title VI Program update

Attachment A

TRIMET BOARD RESOLUTION APPROVING TRIMET'S TITLE VI PROGRAM AND POLICIES

Date: September 28, 2016
To: Board of Directors
From: Neil McFarlane *Neil McFarlane*
Subject: RESOLUTION 16-09-60 OF THE TRI-COUNTY METROPOLITAN
TRANSPORTATION DISTRICT OF OREGON (TRIMET)
APPROVING THE 2016 TITLE VI PROGRAM AND POLICIES

1. 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 attached Exhibit A) to be submitted to the Federal Transit Administration (FTA) by October 1, 2016.

2. Type of Agenda Item

- Initial Contract
- Contract Modification
- Other Approval of the 2016 Title VI Program and Policies

3. 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 Title VI program as a condition of receiving ongoing federal funds. FTA Circular 4702.1B requires that transit providers brief and obtain approval from the transit providers’ governing board regarding their Title VI Program and Policies, including the results of the established service monitoring program.

4. Type of Action:

- Resolution
- Ordinance 1st Reading
- Ordinance 2nd Reading
- Other _____

5. 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 FTA funds, TriMet is required to comply with Title VI regulations issued by DOT. Every three years FTA requires TriMet to submit a new Title VI program as a condition of receiving ongoing federal funds.

Current Requirements

FTA requires each large public transportation provider's governing board to approve policies and standards in regard to:

- 1) Major Service Change Policy – “Major Service Change Policy” 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 and 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 and 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 developed through public input gathered by Diversity and Transit Equity Department staff in partnership with community based organizations, which hosted a series of Title VI forums to gather feedback and insight from TriMet riders. TriMet staff also surveyed non-profit and community based agency partners that participate in the Access Transit program to gather additional input on potential Title VI program changes.
 - b. Information on TriMet's Title VI program, complaint procedures, and the proposed standards and policies were also made available on the TriMet's website for public comment and review.
 - c. During the course of the Title VI program update process, the Transit Equity Advisory Committee (TEAC) provided feedback and ongoing support to improve the program, policies, and public engagement process, and helped develop and participate in the public Title VI community forums.

6. Procurement Process

This Resolution does not involve a procurement process.

7. Diversity

In developing proposed changes to the Title VI Program and Policies, TriMet sought input from TriMet riders, the public, community based organizations, and the TEAC.

8. Financial/Budget Impact

There is no financial impact to making the proposed changes to the 2016 Title VI Program and Policies.

9. Impact if Not Approved

The 2016 Title VI Program is required by federal law and FTA as a condition of receiving federal funding. Approval by the Board is required prior to submission to the FTA. The Board could choose not to approve the 2016 Title VI Program and Policies if it is determined that it did not wish to at this time.

RESOLUTION 16-09-60

**RESOLUTION OF THE TRI-COUNTY METROPOLITAN
TRANSPORTATION DISTRICT OF OREGON (TRIMET) APPROVING THE
2016 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 2016 Title VI Program and Policies as set forth in the attached Exhibit A entitled "2016 Title VI Program Update," 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 "2016 Title VI Program Update;" and

WHEREAS, the Board has authority under ORS Chapter 267 to approve by resolution the "2106 Title VI Program Update;"

NOW, THEREFORE, BE IT RESOLVED:

That the Board hereby approves the TriMet's 2016 Title VI Program and Policies as set forth in the attached Exhibit A entitled "2016 Title VI Program Update," 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: September 28, 2016



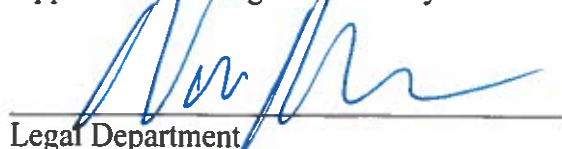
Presiding Officer

Attest:



Recording Secretary

Approved as to Legal Sufficiency:



Legal Department

Attachment B

TRIMET TITLE VI COMPLAINT FORM

Tri-County Metropolitan Transportation District of Oregon (TriMet)

1800 SW 1st Ave., Suite 300
Portland, OR 97201

503.962.2217
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, 1800 SW 1st Ave., Suite 300, Portland, OR 97201.

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.

Complainant's Signature

Date

Attachment C

TRIMET TITLE VI VEHICLE NOTICE

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.

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 bất cứ ai cho rằng họ đã bị phiền toái vì những thủ tục kì thị 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.

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 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.

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.

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，請聯系我們503-238-7433 (聽力障礙 503-238-5811) 或發電子郵件至administration@trimet.org。

Attachment D

TRIMET PUBLIC ENGAGEMENT FRAMEWORK



TriMet Public Engagement and Outreach Framework

Purpose

TriMet recognizes that diverse values and opinions held both individually and as a group contribute to the quality of community life throughout the region. TriMet is committed to engaging the community it serves to ensure diverse public input and equity are part of its transparent policy and decision-making processes.

The general TriMet approach is to engage in a pro-active manner with diverse stakeholders via early, ongoing and meaningful communications. The public engagement process strives to include *all* interested and affected stakeholders – riders, members of vulnerable populations, members of diverse communities, elected officials, civic and business organizations, residents, and property owners to ensure they are provided opportunities for meaningful input.

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 informed 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.

Consistent with the requirements of Title VI, TriMet staff use GIS mapping software.

- Maps are created to identify affected low income, minority, and limited English proficient communities.
- Analysis is shared with TriMet staff working with affected communities to develop strategies to engage minority, low income and LEP populations, and to ensure proposed service changes are in compliance with the requirements of Title VI.

TriMet Demographic Profile

Low-income: TriMet defines low-income persons as someone whose household income is at or below 150% of the federal poverty level. Based on 2010-2014 US Census American Community Survey five-year estimates, 23.6 percent of the population within TriMet's service district are low-income under this definition.

According to the 2010-2014 ACS 28 percent of the population within TriMet's service district is considered minority. This includes Hispanic or Latino (12.1 percent), Asian (6.9 percent), Black (3.4 percent), American Indian/Alaskan Native (.6 percent) and Native Hawaiian/Pacific Islander (.5 percent).

TriMet defines LEP by respondent's indication on the Census that they speak English "less than very well."

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 percent of total population or 1,000 individuals, whichever is less.

This data below was retrieved for the three-county region (Clackamas, Multnomah, and Washington counties) in which TriMet provides service.

Languages Spoken by LEP Persons Age 5 and Older in TriMet Transit District

Languages Spoken at Home	LEP Population Estimate	Percentage of Total Population	Percentage of LEP Population
Spanish	59,846	4.18%	47.94%
Vietnamese	14,132	0.99%	11.32%
Chinese (Cantonese, Mandarin)	10,152	0.71%	8.13%
Russian	6,834	0.48%	5.47%
Korean	3,850	0.27%	3.08%
Ukrainian*	2,091	0.15%	1.67%
Japanese	2,074	0.14%	1.66%
Tagalog	1,950	0.14%	1.56%
Romanian*	1,862	0.13%	1.49%
Arabic	1,715	0.12%	1.37%
Mon-Khmer, Cambodian	1,407	0.10%	1.13%
Persian	1,097	0.08%	0.88%
Other languages	17,837	1.25%	14.29%
Total	124,848	8.73%	100%

Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Tables: 2010 - 2014 (5-Year Estimates)

*Ukrainian and Romanian figures were only available for Multnomah and Washington counties

Public Engagement Process

TriMet’s public engagement process is based on nationally-established public participation core values:

1. Public participation is based on the belief that those who are affected by a decision have a right to be involved in the decision-making process.
2. Public participation includes the promise that the public's contribution will influence the decision.
3. Public participation promotes sustainable decisions by recognizing and communicating the needs and interests of all participants, including decision makers.
4. Public participation seeks out and facilitates the involvement of those potentially affected by or interested in a decision.
5. Public participation seeks input from participants in designing how they participate.

6. Public participation provides participants with the information they need to participate in a meaningful way.
7. Public participation communicates to participants how their input affected the decision.

A TriMet public engagement plan must include 11 critical elements:

A public engagement plan is required for any significant agency change as well as future planning objectives. Changes include those relating to fares, fare policy, service and capital projects.

A TriMet public engagement plan must include 11 critical elements:

1. Clearly defined purpose and objectives for initiating public dialogue. Shared understanding of the level and type of participation the plan is designed to generate.
2. Clear messages.
3. Specific identification of the potentially-affected public and other stakeholder groups.
 - a. Special effort placed on reaching underserved populations. These may be hard-to-reach groups such as low-income individuals, transit-dependent riders or members of minority communities. Strategies to reach will include going to where people live, work, go to school, practice faith, or shop; and providing culturally-competent materials.
4. Identification of possible barriers to participation among targeted populations and strategies to reduce these barriers.
5. Language needs identified to ensure participation of Limited English Proficiency (LEP) persons.
6. Use four-factor analysis to ensure access for LEP persons:
 - i. number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity or service;
 - ii. frequency with which LEP individuals come in contact with the program or service;
 - iii. nature and importance of the proposed changes to people's lives; and
 - iv. resources available to the recipient and costs.
7. Identification of engagement strategies and tactics.
8. Education/ information that results in accurate and full public understanding of options (as appropriate) and related issues.
9. Reflection of brand.
10. Info-gathering process outline.
11. Timeline and staff accountabilities.
12. Documentation process.

Before each plan is developed, the following levels of participation are reviewed to ensure clarity on what the agency is seeking. These levels and actions are based on best practices adapted from the International Association for Public Participation.

Possible Level of Participation from Stakeholders			
Inform	Consult	Involve	Collaborate
Provide the stakeholder with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions.	Obtain stakeholder feedback on analysis, alternatives and/or decisions	Work directly with the stakeholder throughout the process to ensure that stakeholder concerns and aspirations are consistently understood and considered.	Partner with the stakeholder in each aspect of the decision including the development of alternatives and the identification of the preferred solution.
Corresponding Commitment			
Inform	Consult	Involve	Collaborate
We will keep you informed	We will keep you informed, listen to and acknowledge concerns and aspirations, and provide feedback on how stakeholder input influenced the decision.	We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how stakeholder input influenced the decision.	We will look to you for advice in formulating solutions and include your advice and recommendations in the decisions to the maximum extent possible.

Public Participation Implementation

Strategies

This section will lay the framework for the public participation strategies to be used in fulfilling the project goals. This will include strategies for:

- Communication and raising awareness about the project.
- Education and discussion about the code and key community issues impacted by the code.
- Gathering input about what people like and value about specific places, as well as what concerns them.
- Gathering input on broader topics of concern related to the code and the process of working with the code.
- Gathering input on the analysis of existing community character.
- Deliberate possible approaches to preserve and enhance changes envisioned in Imagine Austin, and exploring possible approaches and, ultimately, rules that are appropriate for achieving desired community character and accommodating change.

Methods

Methods used to implement the engagement strategies will be designed to integrate the guiding principles of engagement. Potential methods include:

- Interviews to understand perceptions and attitudes for effective messaging and communication
- Stakeholder interviews to understand detailed issues, concerns with, and possible approaches to reflect in the service changes.

- Listening sessions with the general public to understand likes and concerns about specific places and gather feedback on the public engagement plan.
- Small-group meetings with existing and new stakeholder groups to gather input on what they value and are concerned about on both specific places and related to the code itself
- Educational open houses to foster more in-depth learning and discussion about hot topics related to service changes.
- Booths and presentations at neighborhood and community events and presentations at existing meetings of community organizations

Tools and Platforms

Specific tools and platforms will be necessary to offer several ways to submit stakeholder feedback. These tools will be used to inform and engage the community about the project, which include:

- Website, including online engagement platform, surveys, etc.
- Social media (Facebook, Twitter, YouTube, Instagram)
- Traditional media, including news releases, press conferences, media interviews and public service announcements
- Email and service alerts
- Traditional advertising in digital and print publications

Documenting Input and Improving the Process

The final section of the Plan will include the approaches that will be used to gather and document input provided by the public and the methods to help foster a two-way conversation in which questions are answered in a timely, transparent and informed fashion. Also included in this section will be the mechanisms for continually learning from what's working and what needs improvement in the public engagement process. It will include documentation methods for gathering quantitative and qualitative data about participation and strategies for process improvement. This information will be gathered by outreach staff and compiled in CiviCRM.

L.Parker
revised: 6.8.2016

Attachment E

LEP ACCESS PLAN & IMPLEMENTATION SCHEDULE



Limited English Proficient (LEP)

LEP Access Plan and Implementation Schedule

December 1, 2010

**TriCounty Metropolitan Transportation District
of Oregon**

I. MESSAGE FROM THE GENERAL MANAGER	3
II. EXECUTIVE SUMMARY	4
III. BACKGROUND	6
LEGAL BASIS FOR LANGUAGE ASSISTANCE REQUIREMENTS	6
LEP ACCESS PLANNING PROCESS.....	7
APPLYING THE FOUR FACTOR ANALYSIS	8
<i>Factor 1: The number and proportion of LEP persons served.....</i>	<i>8</i>
<i>Factor 2: The frequency of contact.....</i>	<i>11</i>
<i>Factor 3: The importance to LEP persons of your program, activities, and services</i>	<i>13</i>
<i>Factor 4: The resources available to the recipient and costs.....</i>	<i>14</i>
IV. LEP ACCESS PLAN.....	15
THE LEP ACCESS PLAN.....	15
LEP PLAN IMPLEMENTATION CALENDAR	17
LEP ACCESS PLAN IMPLEMENTATION GUIDELINES.....	20
1A: <i>Notice of Right To Language Assistance, Non-vital Outreach Documents.....</i>	<i>21</i>
1B: <i>Use of In-person Interpreter Services at Public Meetings.....</i>	<i>23</i>
3A: <i>Curriculum Development.....</i>	<i>30</i>
3B: <i>Incorporate LEP Information Into Employee Environment.....</i>	<i>35</i>
5A: <i>Right to Language Assistance Notice.....</i>	<i>38</i>
5B: <i>Notice of Civil Rights Complaint Process</i>	<i>40</i>
5C: <i>Customer Information Channels.....</i>	<i>42</i>
6A: <i>Culturally-Competent Outreach</i>	<i>44</i>
7B: <i>LEP Plan Demonstration Program “After” Study.....</i>	<i>47</i>
7C: <i>LEP Plan Monitoring</i>	<i>48</i>
LEP EDUCATION.....	50
<i>LEP Resource Guide</i>	<i>50</i>
<i>LEP Orientation PowerPoint</i>	<i>52</i>
V. LEP ACCESS PLAN: PROGRESS SUMMARY	81
DEMONSTRATION PROGRAM UPDATES.....	81
LEP PROGRAM MATERIAL EXAMPLES.....	83
VI. APPENDIX.....	86
1: LEP WORKGROUP WORK PLAN.....	87
2. FOUR FACTOR DETAIL.....	89
<i>Factor 1: The number and proportion of LEP persons served.....</i>	<i>89</i>
<i>Factor 2: The frequency of contact.....</i>	<i>91</i>
<i>Factor 3: The importance to LEP persons of your program, activities, and services</i>	<i>93</i>
<i>Factor 4: The resources available to the recipient and costs.....</i>	<i>107</i>
3: LEP PLANNING: TASKS & RESPONSIBILITIES CHECKLIST	109
TABLE 1: METHODS TO CAPTURE FREQUENCY OF LEP INTERACTIONS	11
TABLE 2: CALL CENTER LANGUAGE ASSISTANCE REQUESTS	11
TABLE 3: RESOURCES AVAILABLE FOR LEP ACTIVITIES	14
FIGURE 1: LEP LANGUAGE GROUPS	8
FIGURE 2: LEP POPULATION CLUSTERS AND TRIMET SERVICE	9

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.



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."¹

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 developed². 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.

¹ Limited English Proficient Persons, Fred Hansen, June 8, 2005

² 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.

Factor 1: The number and proportion of LEP persons served

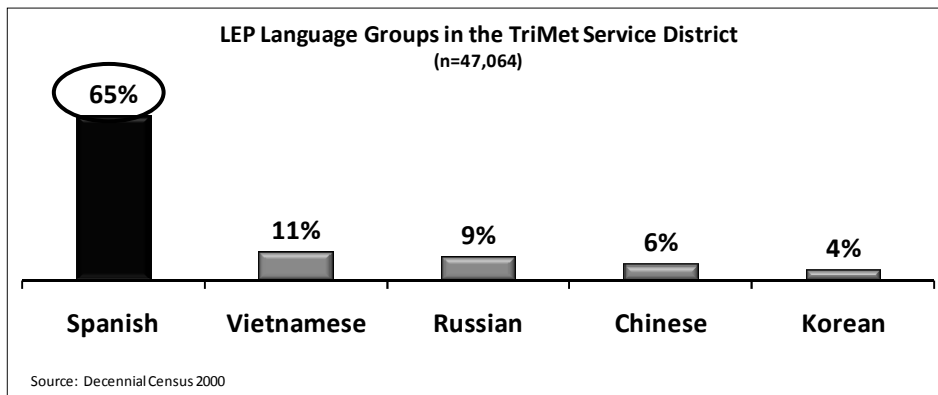
To conduct Factor 1, the LEP Workgroup sought quantitative and qualitative information regarding LEP populations.

- **Quantitative data**³

- 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 LEP⁴ "Safe Harbor" thresholds (5% or 1,000 individuals, whichever is less) included speakers of:

- ✓ Spanish (30,816)
- ✓ Vietnamese (5,185)
- ✓ Russian (4,095)
- ✓ Chinese⁵ (2,775)
- ✓ Korean (2,070)

Figure 1: LEP Language Groups



³ 2000 Decennial Census

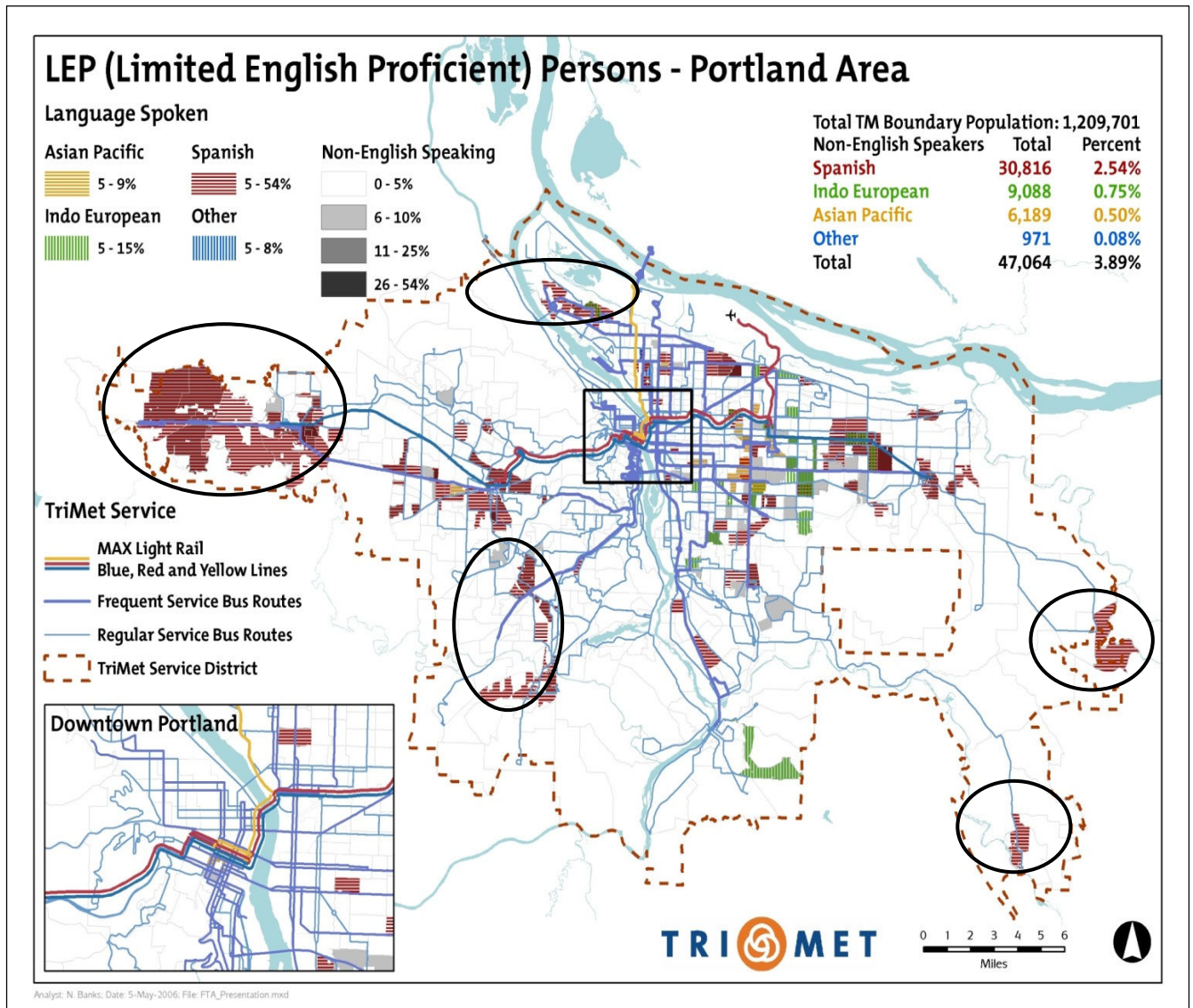
⁴ Speak English "less than well" based on 4-point scale: Very well, well, not well, not at all

⁵ 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 groups⁶ 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.

⁶ 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
RIDERSHIP				
Automatic Passenger Counters (APC)	No	No	No	No
LIFT and ATP records	Yes	No	Yes	Yes
Survey research	Yes	Yes	Yes	Yes
FARES				
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
CUSTOMER INFORMATION				
<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
TOTALS	99,000	331	272
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 dependent⁷ 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.

⁷ 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
TOTALS	\$ 38,017		\$ 17,002
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, TIP⁸ 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.

⁸ 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.

LEP ACCESS PLAN IMPLEMENTATION CALENDAR: FY06-FY11		X	= Target completion				
			= Estimated completion				
		✓	= Actual completion				
ACTIVITIES	TRIMET FISCAL YEAR						STATUS
	FY06	FY07	FY08	FY09	FY10	FY11	
1. Language Assistance							
1A Determine process for providing notice of right to language assistance, at no cost, on non-vital yet important outreach documents.		X		✓			Completed and ongoing activity.
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			✓			Completed and ongoing activity
1C: Create sign in multiple languages informing LEP clients about available language services and post at TTO.		X			✓		Have signage regarding Title VI procedures
1D: Provide telephone interpretation for basic transit questions and trip planning assistance in virtually any language	✓						Standard operating procedure for many years. Contract with vendor to provide unlimited access to language professionals for interpreting assistance.
2. Vital Documents							
2A Written translations of vital documents in each of the five languages, AND/OR replacing text with pictograms/universal icons whenever possible.		X		✓			Ongoing activity. Spanish language "novella" format (<i>Viaje Mejor</i>) is a prime example of translating and graphically representing "vital" knowledge non-English speakers must know to use the TriMet system.
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			✓			
3. Training: Human Resources							
3A Develop curriculum and train frontline and other key staff in:							Training program developed and in testing throughout the agency.
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.

LEP ACCESS PLAN IMPLEMENTATION CALENDAR: FY06-FY11		X	= Target completion				
			= Estimated completion				
		✓	= Actual completion				
ACTIVITIES	TRIMET FISCAL YEAR						STATUS
	FY06	FY07	FY08	FY09	FY10	FY11	
4. Definitions and Standards: Marketing							
4A Determine desired English competency standards for interpreters and translators.		X		✓			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.		X	✓				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		X	✓				Completed and ongoing activity.
5. Customer Information: Marketing							
5A Provide information in multiple languages about civil rights complaint process and post at TTO and TriMet website		X	✓				Title VI, see <i>trimet.org</i> Language Services page
5B Provide information in multiple languages about general complaint process		X			✓		Practice is to contact the LEP coordinator.
5C Create protocol for responding to foreign language correspondence and communication.		X			✓		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.			✓				Ongoing process -- done as needed
6. Outreach: Marketing							
6A Develop and implement culturally-competent outreach to increase awareness and access to services.			X	✓			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.				✓			
2. Test materials with key constituencies.				✓	✓	✓	
3. Establish a relationship and partner with key community leaders and organizations of target audience.			✓	✓	✓	✓	
4. Individual one on one meetings, telephone calls, and e-mail messages to target leadership.					✓		
5. Visit/participate in scheduled community events of target audience to promote message.				✓	✓	✓	
6. Target outreach to key gathering places such as churches, schools, community colleges, libraries, and social service and community activist organizations.				✓	✓	✓	
7. Promote message with community media—create earned media opportunities.				✓	✓	✓	
8. Use TriMet vehicles and properties to display message in target language.				✓	✓	✓	
9. Develop print, radio, and television ads in target languages.				✓	✓	✓	
10. Use TriMet personnel that reflect target audience to promote message.				✓	✓	✓	

LEP ACCESS PLAN IMPLEMENTATION CALENDAR: FY06-FY11		X	= Target completion					
			= Estimated completion					
		✓	= Actual completion					
ACTIVITIES	TRIMET FISCAL YEAR						STATUS	
	FY06	FY07	FY08	FY09	FY10	FY11		
7. Research and Administration								
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 April 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.	
COMMUNITY EVALUATION								
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 plan								
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.								
EMPLOYEE EVALUATION (Operators & Staff)								
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					✓			
8. Capital Projects & Facilities								
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.		✓		✓				
9. LEP Data Tracking								
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. Escuche**" (*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.

The cover features the TRIMET logo at the top left, followed by the title 'Rider's Guide' and 'Fares & How to Ride' in large white text on a blue background. Below the title is a bulleted list of services: Buses, MAX Light Rail, WES Commuter Rail, and Portland Streetcar. At the bottom, it says 'Plan your trip at trimet.org' and 'Effective Jan. 3, 2010' with an information icon.

TRIMET
Rider's Guide

**Fares &
How to Ride**

- Buses
- MAX Light Rail
- WES Commuter Rail
- Portland Streetcar

Plan your trip at trimet.org

Effective
Jan. 3, 2010

The cover features the TRIMET logo at the top, followed by the title 'VIAJE MEJOR' in large, stylized red and white text on a blue background. Below the title is a comic-style illustration of a man and a woman. The man says, 'Carmen, aqui estoy! ¡Bienvenida a Portland!' and the woman replies, '¡Jorge! ¡Qué gusto verte!'. At the bottom, it says 'Su guía al transporte público'.

TRIMET

**VIAJE
MEJOR**

Carmen,
aqui estoy!
¡Bienvenida a
Portland!

¡Jorge!
¡Qué gusto
verte!

Su guía al transporte público


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 28-29 • trimet.org/ride



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 28-29



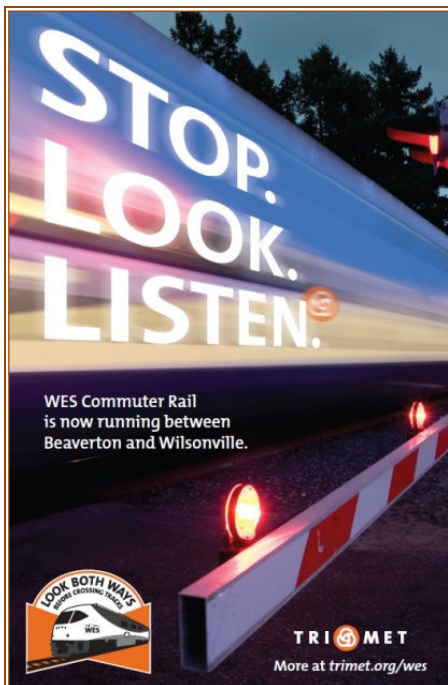
Safety around trains: English & Spanish

**STOP.
LOOK.
LISTEN.**

WES Commuter Rail
is now running between
Beaverton and Wilsonville.

LOOK BOTH WAYS
¡MIRA AMBOS LADOS

TRIMET
More at trimet.org/wes



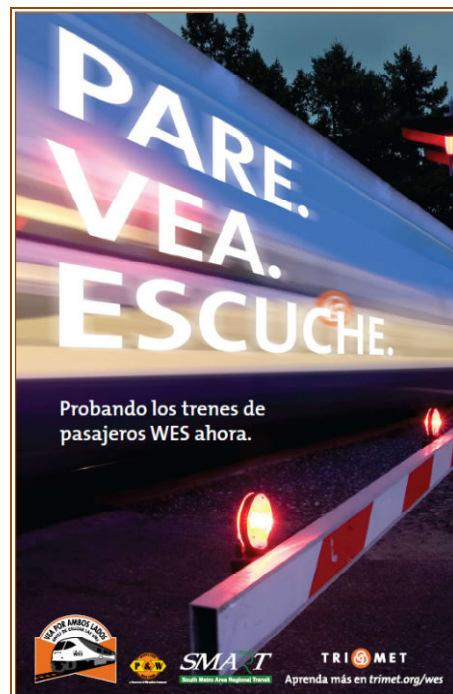
**PARE.
VEA.
ESCUCHE.**

Probando los trenes de
pasajeros WES ahora.

LOOK BOTH WAYS
¡MIRA AMBOS LADOS

TRIMET
Aprenda más en trimet.org/wes

SMA T
South Metro Area Regional Transit





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 LEP⁹ and of "Safe Harbor" thresholds (5% or 1,000 individuals, whichever is less) included speakers of:

- Spanish (65%)
- Vietnamese (11%)
- Russian (9%)
- Chinese¹⁰ (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.

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

¹⁰ 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. **IRCO¹¹:** 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.

¹¹ 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



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 Усл Угах 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. сообщите 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

TRI MET
See where it takes you.

Bus MAX Light Rail WES Commuter Rail Portland Streetcar

Fares ▶ Maps & Schedules ▶ Stops & Stations ▶ How to Ride ▶ TriMet Store ▶

Home > About TriMet > Our Organization > TriMet Title VI Policy Statement

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.

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

Trip Planner
Transit Tracker
Service Alerts



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 Públicas
- 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 help 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

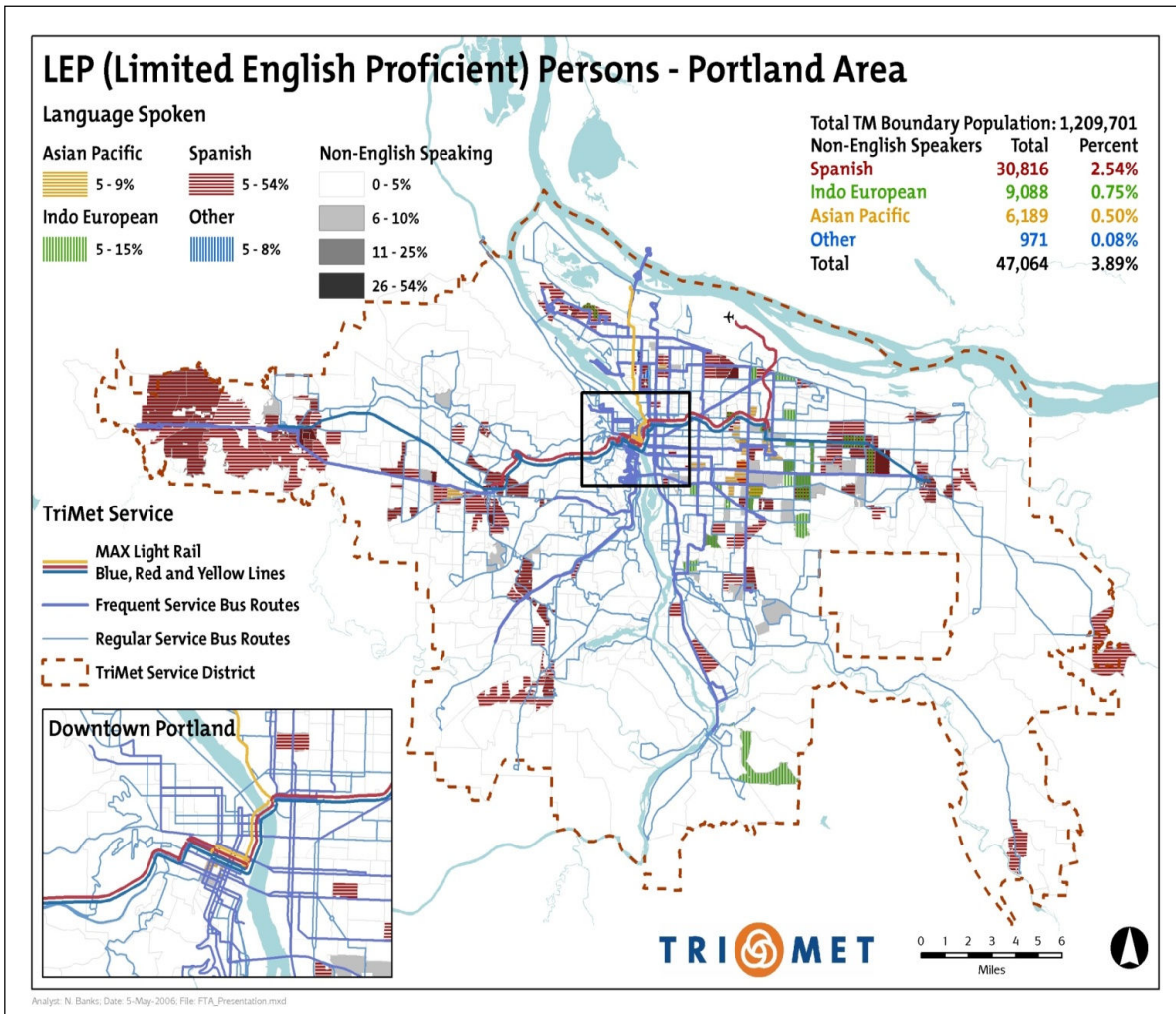
TriMet Resources Available to Help You Improve Communication with LEP Customers

- 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





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.

LEP - Limited English Proficiency

Access Plan

DB 06-30-10

TRIMET

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

TRIMET

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

TRIMET

Going back to 2005

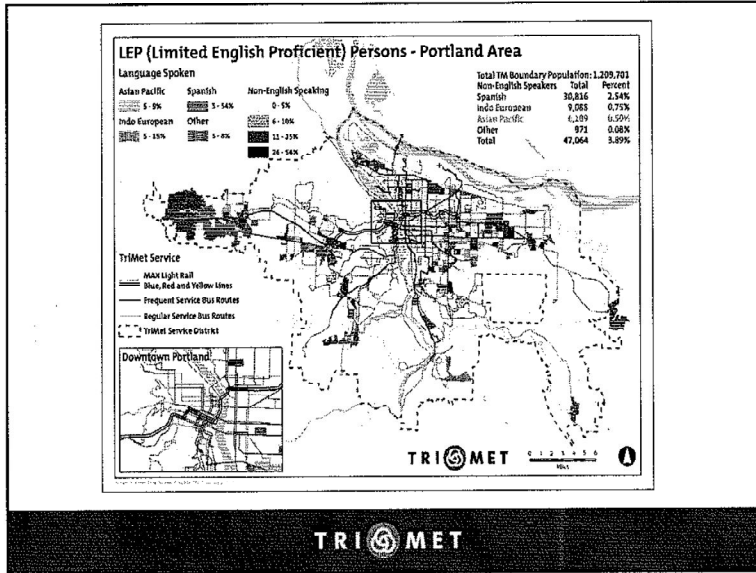
The U.S. Department of Transportation published revised LEP guidance for its recipients on December 15, 2005 which helps agencies develop LEP implementation plans consistent with the provisions of Section VII of the DOT LEP guidance.

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

TRIMET

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.

TRI MET

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

TRIMET

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

Customer Information
Examples

RESPECT THE RIDE.

• Please use appropriate language.
• Please do not drink alcohol while riding.
• Please do not use mobile phones while riding.
• Please do not use headphones.
• Please do not use firearms.
• Please do not use weapons.
• Please do not use drugs.
• Please do not use illegal substances.
• Please do not use illegal substances.

TRIMET
© 2011

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

© 2011 TRIMET

TRIMET

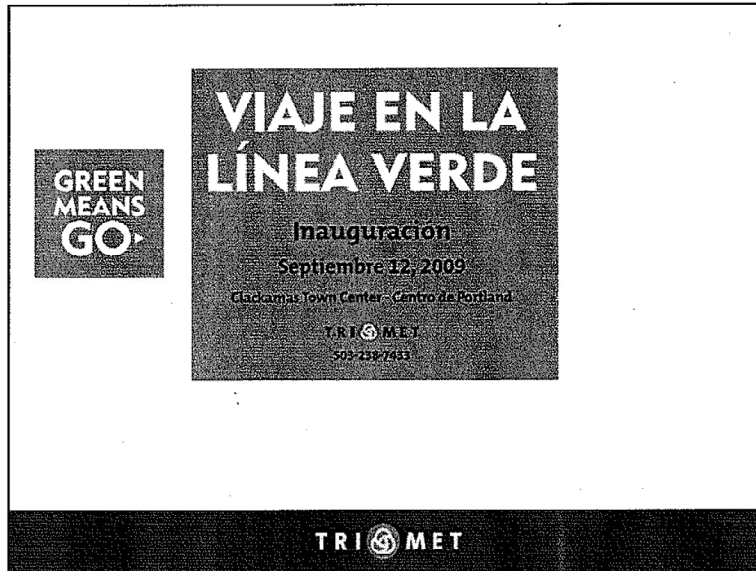
On Street

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.



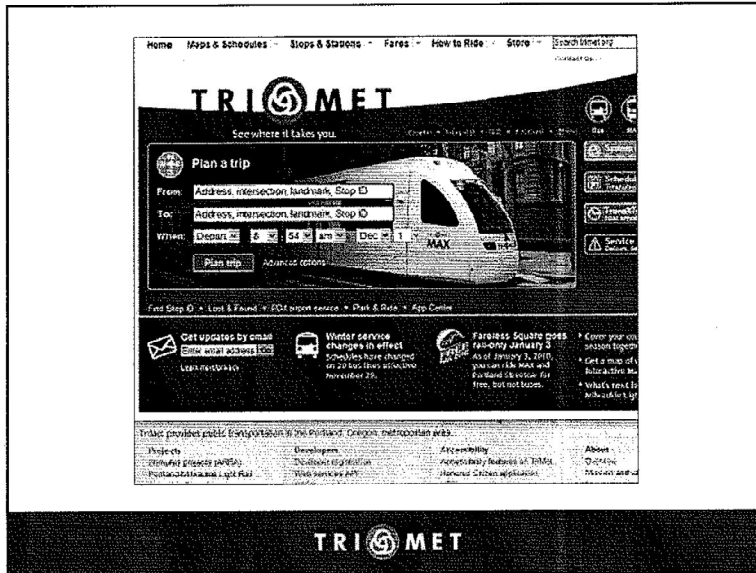
Promotional Material

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








ICON	LOCATION
	<ul style="list-style-type: none"> • Website • Park & ride wayfinding signs • Facility signage
	<ul style="list-style-type: none"> • Website • Park & ride wayfinding signs • Facility signage
	<ul style="list-style-type: none"> • Website • Park & ride wayfinding signs • Facility signage
	<ul style="list-style-type: none"> • Website
	<ul style="list-style-type: none"> • Website • Trip Tools booklet copy on most brochures and Service Alerts
	<ul style="list-style-type: none"> • Website • Trip Tools booklet copy on most brochures and Service Alerts
	<ul style="list-style-type: none"> • Website • On-street information displays

TRI MET








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.

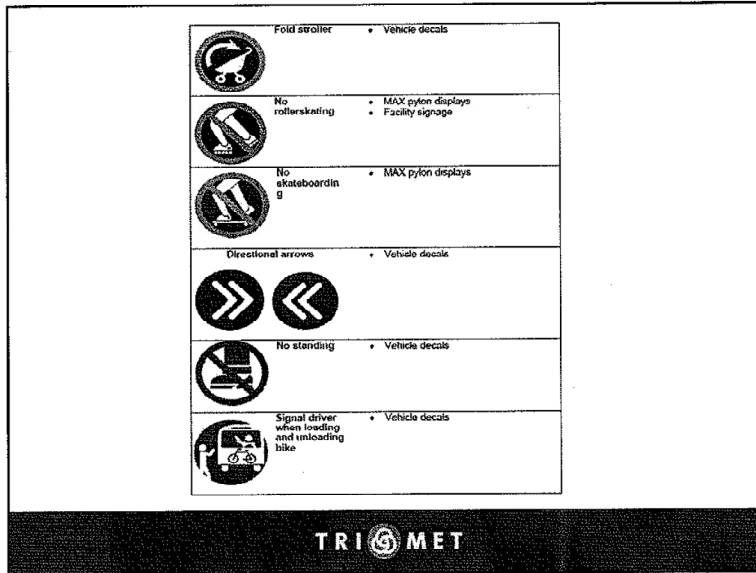
So we've created a considerable inventory of iconography to communicate with our broad and diverse audiences. Some of these represent **universal symbols**. Some are created for our specific circumstances and testing becomes an integral part of this evolutionary process to ensure our customers understand the symbols to mean what we intended.

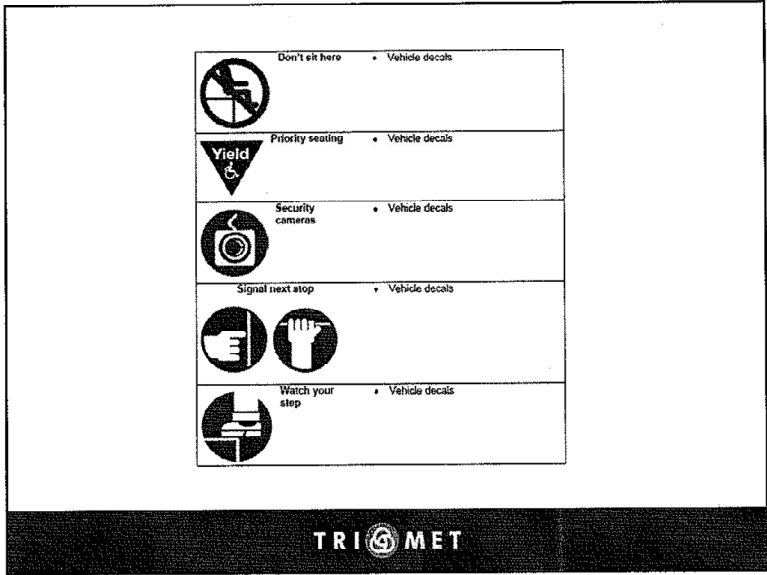
	Email or mail	<ul style="list-style-type: none"> • Website • Trip Tools brochure
	Store or shopping	<ul style="list-style-type: none"> • Website
	Transit Tracker or Arrival Time	<ul style="list-style-type: none"> • Website • Trip Tools brochure
	Walk	<ul style="list-style-type: none"> • Website • Wayfinding signs & banners
	Snow	<ul style="list-style-type: none"> • Website • Shelter & sign displays
	Directions or Trip Plan	<ul style="list-style-type: none"> • Website • Trip Tools brochure
	Parking	<ul style="list-style-type: none"> • Website • Park & Ride wayfinding signs • Maps

TRI MET

	<p>Detour</p> <ul style="list-style-type: none"> • Website • Trip Tools brochure
	<p>Disabled access</p> <ul style="list-style-type: none"> • Vehicle decals • Parking signs • Wayfinding signs
	<p>Bike access</p> <ul style="list-style-type: none"> • Wayfinding signs & banners • Bike locker decals
	<p>No bikes</p> <ul style="list-style-type: none"> • MAX pylon displays • Mail stop displays • Signs
	<p>Cross at crosswalk</p> <ul style="list-style-type: none"> • Signs
	<p>Look both ways</p> <ul style="list-style-type: none"> • Signs
	<p>No smoking</p> <ul style="list-style-type: none"> • MAX pylon displays • Bus stop displays

TRI MET



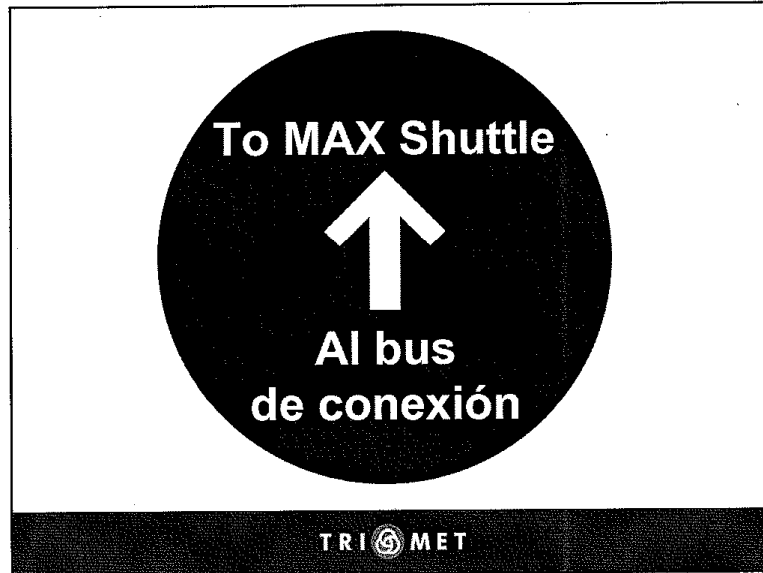




Some are as **simple** as a MAX train symbol and an arrow to direct people to the train's location.



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 Pùblicas
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

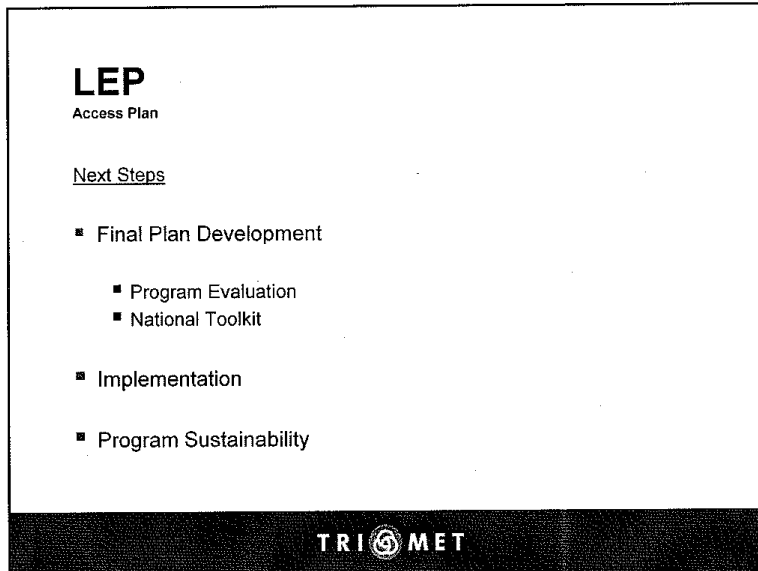
Activities To Date

- 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* to improve trip planning options for LEP customers
- Moved Spanish “prompt” to first place on Transit Tracker by Phone

TRI MET

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* 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.

LEP
Access Plan

**QUESTION
AND
ANSWER**

TRI MET

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

TRIMET
 English • Español • Tiếng Việt
 Русский • 中文 • 한국어

- Fares & how to ride
- Tarifas & cómo viajar
- Giá vé & cách sử dụng các phương tiện chuyên chở công cộng của TriMet
- 车票价格和乘车指南
- 요금 과 승차방법
- Плата за проезд и как поехать

 Effective
Sept. 1, 2010

TRIMET

VIAJE MEJOR



¡Carmen, aquí estoy!
 ¡Bienvenida a Portland!

¡Jorge!
 ¡Qué gusto verte!

Su guía al transporte público

TRIMET



VIAJE MEJOR

TRIMET
trimet.org 503-238-7433



PARE. VEA. ESCUCHE.

El tren de pasajeros WES está operando ahora.
SIEMPRE PUEDE VENIR UN TREN.



TRIMET



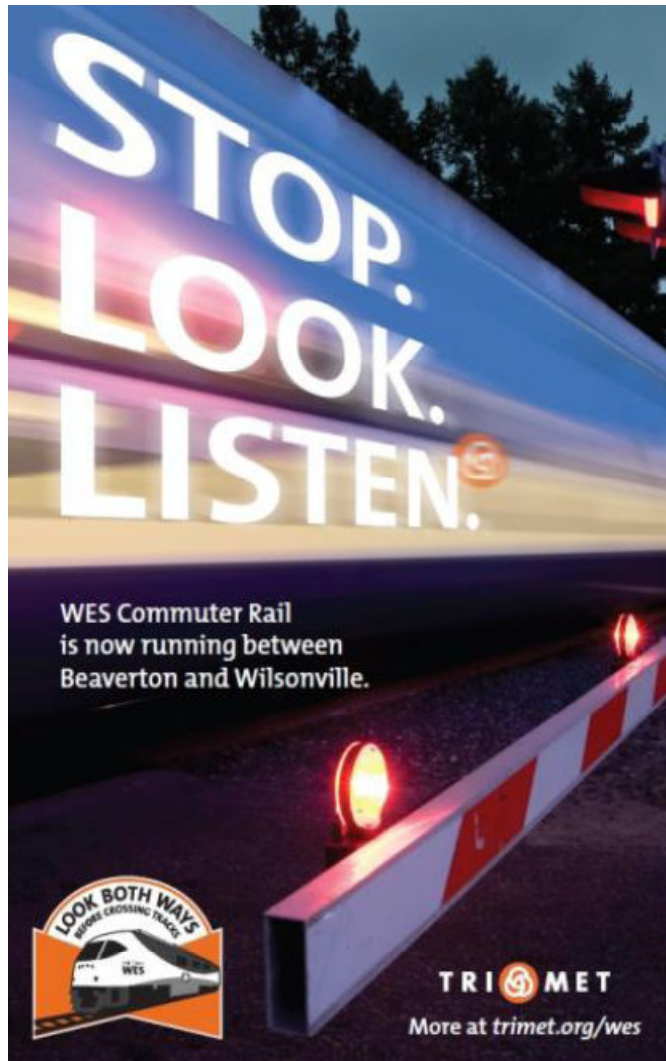
**Más vale prevenir que lamentar.
No te juegues la vida.**

Los trenes no te pueden esquivar.



TRIMET

Más información en trimet.org/wes



WES Commuter Rail is now running between Beaverton and Wilsonville.



TRIMET

More at 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

trimet.org • 503-238-RIDE

MAXIMUM PENALTY: \$250/EXCLUSION • TMC 28-29 • trimet.org/faqs



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

Pena 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
Meeting 1: WORK TASKS	
June 16, 2005	
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)
Meeting 2: NEEDS ASSESSMENT	
June 24, 2005	
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) Programs supporting transportation services: * Jobs * Signage * Informational/written promotional materials	Customer Service, Service Planning, Creative Services, Capital Projects, GIS, Customer Information 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
Meeting 3: ASSESSING SERVICE USAGE	
July 7, 2005	
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
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	
CO-CHAIRS: Ex. Director of Marketing, Manager DTE	

LEP WORKGROUP WORK PLAN: 2005-2006	
MEETING	TEAM ASSIGNMENT
Meeting 4: ASSESSING METHODOLOGY	
July 27, 2005	
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
Meeting 5: RESEARCH REVIEW	
January 19, 2006	
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
Meeting 6: LEP PLAN FRAMEWORK	
May 2006	
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
Meeting 7: WRAPPING UP	
June 1, 2006	
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

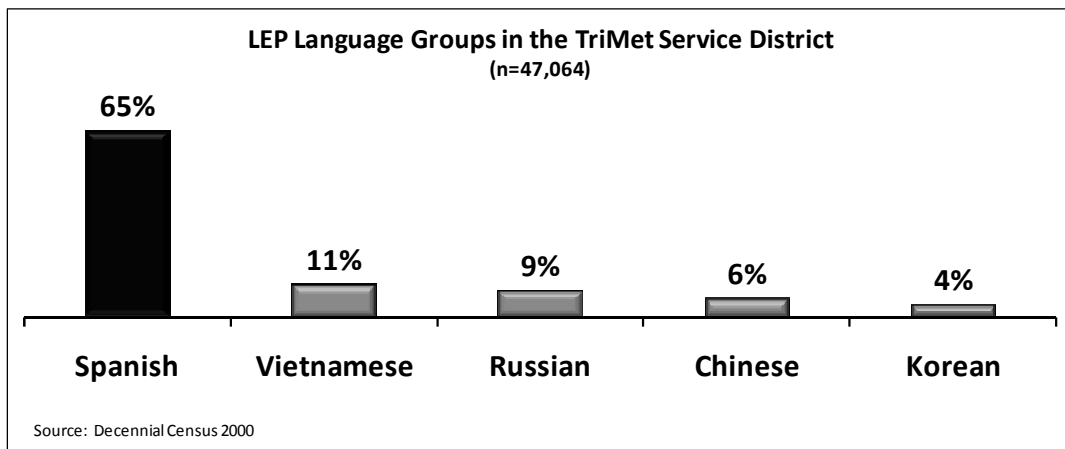
1. Pulled the TriMet service boundaries.
2. Retrieved data from the *2000 Decennial Census*, *Modern Language Association*, and *Geographic Information Systems (GIS)* mapping technology.
3. Analyzed census findings and determined “LEP eligible”¹² populations in accordance with DOT guidelines.
4. Produced 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

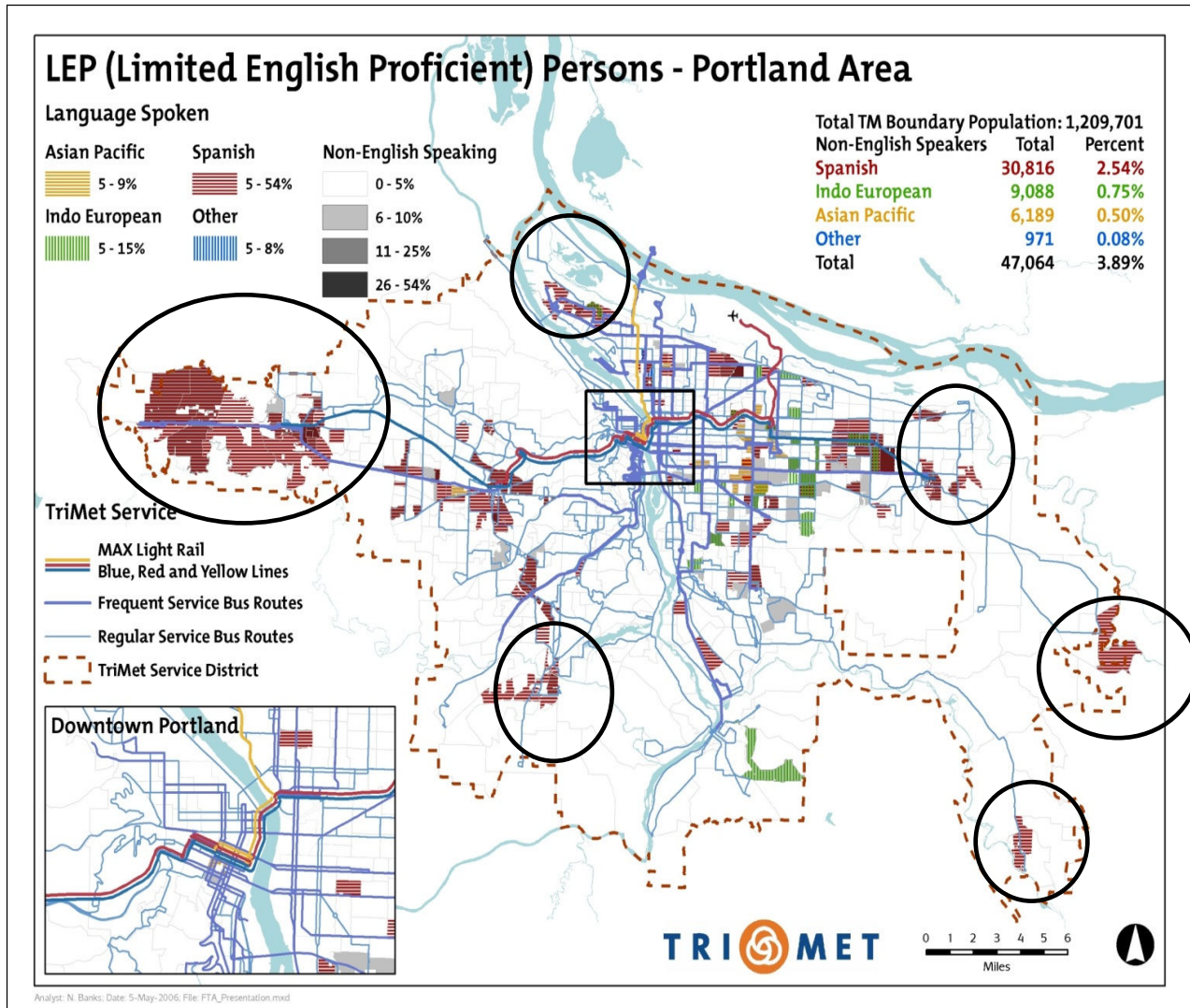
The **quantitative data** analysis showed that 47,064 (3.89%) of the 1,209,701 residents in TriMet’s service district met the DOT definition of LEP eligible populations. The LEP eligible populations in the TriMet district included speakers of Spanish, Vietnamese, Russian, Chinese, and Korean.



¹² 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
TOTALS	99,000	331	272

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
RIDERSHIP				
Automatic Passenger Counters (APC)	No	No	No	No
LIFT and ATP records	Yes	No	Yes	Yes
Survey research	Yes	Yes	Yes	Yes
FARES				
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
CUSTOMER INFORMATION				
<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

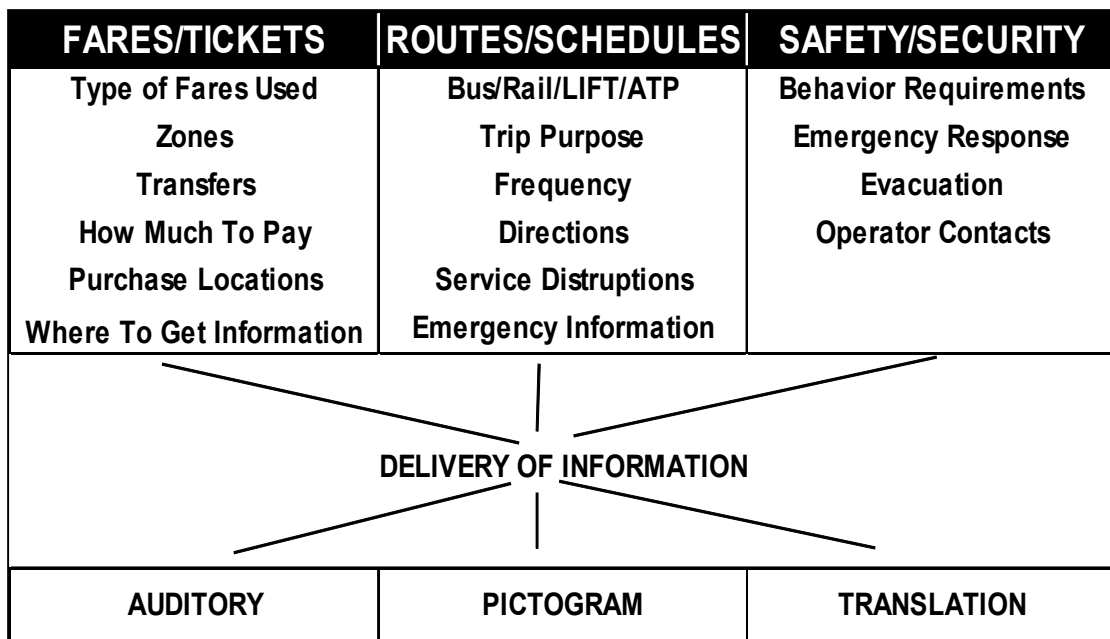
To address Factor 3, Tri Met staff designed and conducted two primary research projects: community roundtables and TriMet operator interviews. Because the budget for this project was minimal, TriMet staff was responsible for every component of the research project – from design through analysis and report 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 interpreters¹³ 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 dependent¹⁴ 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.

¹³ IRCO: Immigrant and Refugee Community Organization, Portland, Oregon

¹⁴ 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.

1. 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>	
Fares: Amount you pay Ticket: Your receipt Zones Price Where to buy How to buy How much to pay (age, etc) Transfers (how long are they good for? Ticket Vending Machines		Routes: Where the bus goes Schedule: Times Bus and MAX Directions Maps How to read the schedule How to talk to bus drivers		Safety: How to behave around trains and buses, so not to get hurt. Security: What to do in an emergency. Emergencies – what to do? Suspicious packages Concerns for personal safety	
Easy? Why?	Hard – Why?	Easy – Why?	Hard? Why?	Easy? Why?	Hard? Why?
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?	
WRITTEN?		VISUAL?		SPOKEN?	

2. 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



No smoking

TriMet Code 28.15(1)(B)(3)



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.¹⁵
- 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.

¹⁵ 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.



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, <i>or</i>	Times per week, <i>or</i>	Times per month
#			
#			
#			

2. In general, how difficult or easy is it for you to communicate with limited-English-speaking-passengers? Would you say:

- ₁ Very difficult
 ₂ Somewhat difficult
 ₃ Somewhat easy
 ₄ Very easy
₅ 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.)*

- ₁ Fare ₃ How to get to their destination (handed address)
₂ Where their stop is ₄ Don't get asked questions
₉ 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.)*

- ₁ Alert them to their stop ₄ How To Ride brochure ₇ Farebox Spanish
₂ Use diagrams or maps ₅ Ask other passengers for help
₈ I don't communicate ₃ Point to fare signage ₆ Paddle w/translations
₉ Other: _____

5. Are you aware of any materials, services, or tools that TriMet uses to communicate with limited-English- speaking passengers?

₁ No ₂ Don't know

₃ Yes → What are those materials, services, or tools?

(Do not read list; check all that apply.)

₄ How To Ride brochures

₇ MAX announcements

₅ Language translation at 238-RIDE

₈ Paddle w/translations

₆ Website

₉ Farebox Spanish

₁₀Other: _____

6. Is there something TriMet can do to help you communicate with limited-English-speaking passengers?

₁ No ₂ Don't know

₃ Yes → What can TriMet do? _____

7. Have you had any TriMet training on how to communicate with limited-English-speaking passengers?

₁ No ₂ Don't know/can't remember

₃ 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

₁₁ I don't communicate *(Don't read)*

9. Overall, what are the most difficult issues you face in your job?

10. Do you speak another language besides English?

₁ No

₂ Yes → What language? ₃ Spanish ₄ Russian ₉ Other: _____

11. How long have you been driving for TriMet? _____

12. Do you drive full-time or part-time? ₁ FT ₂ PT

13. What garage do you drive from? ₁ Center ₂Merlo ₃Powell

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
TOTALS	\$ 38,017		\$ 17,002
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 2007¹⁶

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

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 Team¹⁷ (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.

¹⁶ *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

¹⁷ **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)

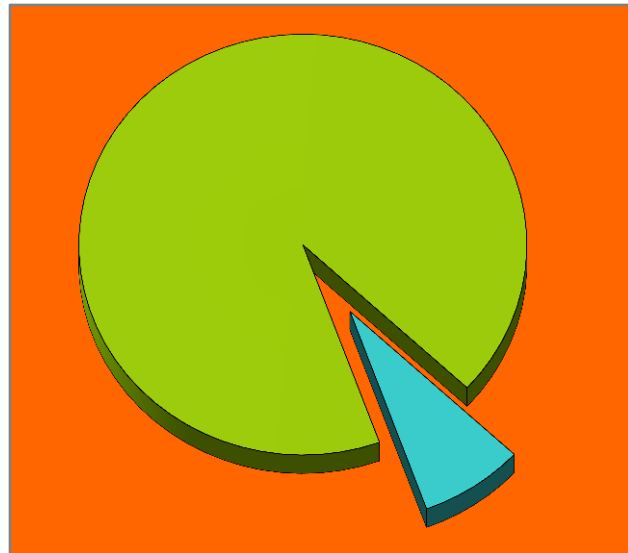
Attachment F

PORTLAND PUBLIC SCHOOLS ESL PROGRAM INFORMATION -2015

ESL PROGRAM

TOTAL SCHOOL ENROLLMENT*	48938
TOTAL SCHOOL ENROLLMENT MINUS ESL STUDENTS	45247
NUMBER OF ENGLISH LANGUAGE LEARNERS ELIGIBLE FOR SERVICES	3691
NUMBER OF STUDENTS WITH A HOME LANGUAGE OTHER THAN ENGLISH	9822
PERCENTAGE OF STUDENTS IN ESL PROGRAM	7.5%

Percentage of English Language Learners at PPS



■ TOTAL SCHOOL ENROLLMENT MINUS ESL STUDENTS
■ NUMBER OF ENGLISH LANGUAGE LEARNERS ELIGIBLE FOR SERVICES

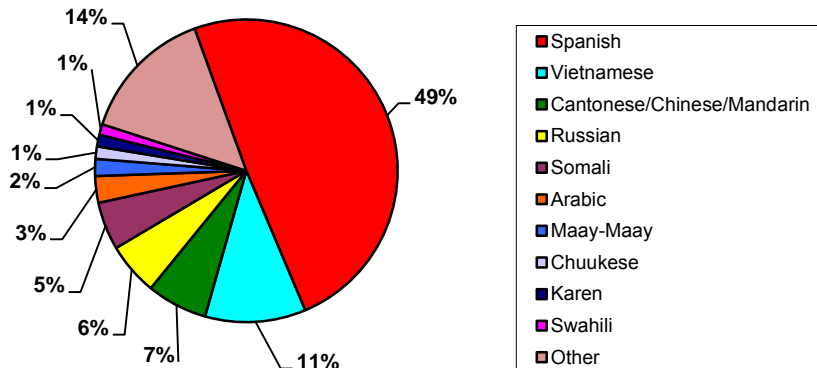
TOP 10 LANGUAGES	
Spanish	1816
Vietnamese	397
Cantonese/Chinese/Mandarin	239
Russian	207
Somali	189
Arabic	105
Maay-Maay	67
Chuukese	49
Karen	46
Swahili	42
Other	534
TOTAL	3691

* Numbers include PK and alternative ed programs.

OTHER LANGUAGES

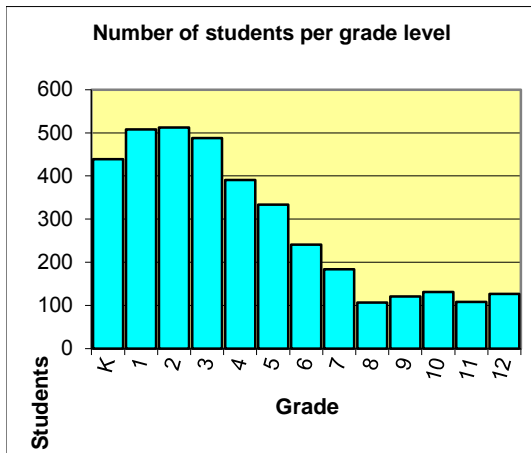
Akan, Albanian, Amharic, Armenian, Bosnian, Bulgarian, Burmese, Cambodian, Cebuano, Creole, Czech, Danish, Dinka, Dutch, Farsi, Fijian, Filipino, Finish, French, German, Guatemalan, Hausa, Hebrew, Hindi, Hmong, Hungarian, Igbo, Indonesian, Island Carib, Italian, Japanese, Kannada, Khmer, Kinyarwanda, Kirundi, Korean, Kurdish, Lao, Lingala, Marshallese, Mayan, Mien, Nepali, Norwegian, Oromo, Other, Palauan, Pashto, Persian, Pohnpeian, Portuguese, Polish, Portuguese, Romanian, Samoan, Sudanese, Tagalog, Tamil, Telugu, Thai, Tibetan, Tigrinya, Tonga, Turkish, Twi, Ukraininan, and Urdu.

Languages Spoken



Data Based on October 2015 Numbers

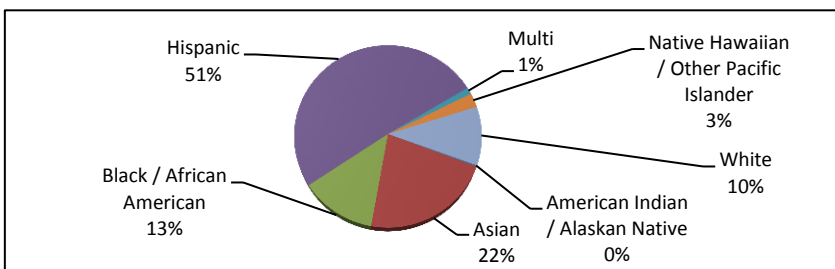
PPS District ESL PROGRAM



GRADE LEVELS												
K	1	2	3	4	5	6	7	8	9	10	11	12
439	508	512	488	391	334	241	184	107	121	131	108	127

Exited during last year - 628
Number of students that refused services - 132
Number of students that are also Sped - 707
Number of students that are also TAG - 16*
Number of exited students that are TAG - 304*
Number of students with 504s - 8
Number in Indian Ed - 6
Number in Migrant Ed - 124
Number of students in an immersion program - 908

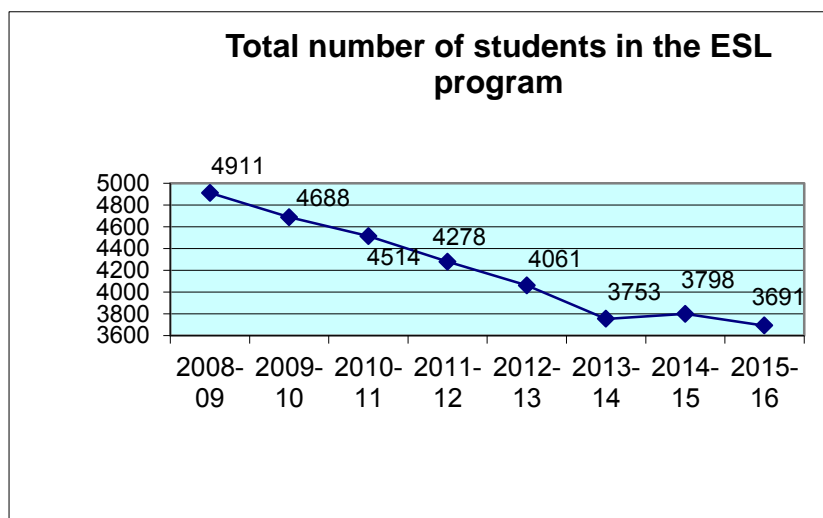
Race	
American Indian / Alaskan Native	8
Asian	813
Black / African American	474
Hispanic	1875
Multi	43
Native Hawaiian / Other Pacific Islander	93
White	385



ELPA LEVELS	1	2	3	4	5	na
Percent of Grades K-5	19 %	30 %	27 %	24 %	<1 %	<1 %
Percent of Grades 6-8	12 %	17 %	31 %	38 %	<1 %	1 %
Percent of Grades 9-12	21 %	11 %	31 %	36 %	0 %	1 %
Percent of All Grades	18 %	26 %	28 %	28 %	<1 %	<1 %

Students on monitoring status	Year 1 - 611	Year 2 - 565
-------------------------------	--------------	--------------

HISTORICAL INFORMATION		
The total number of students in the ESL/Bilingual Program		
2008-09		4911
2009-10		4688
2010-11		4514
2011-12		4278
2012-13		4061
2013-14		3753
2014-15		3798
2015-16		3691



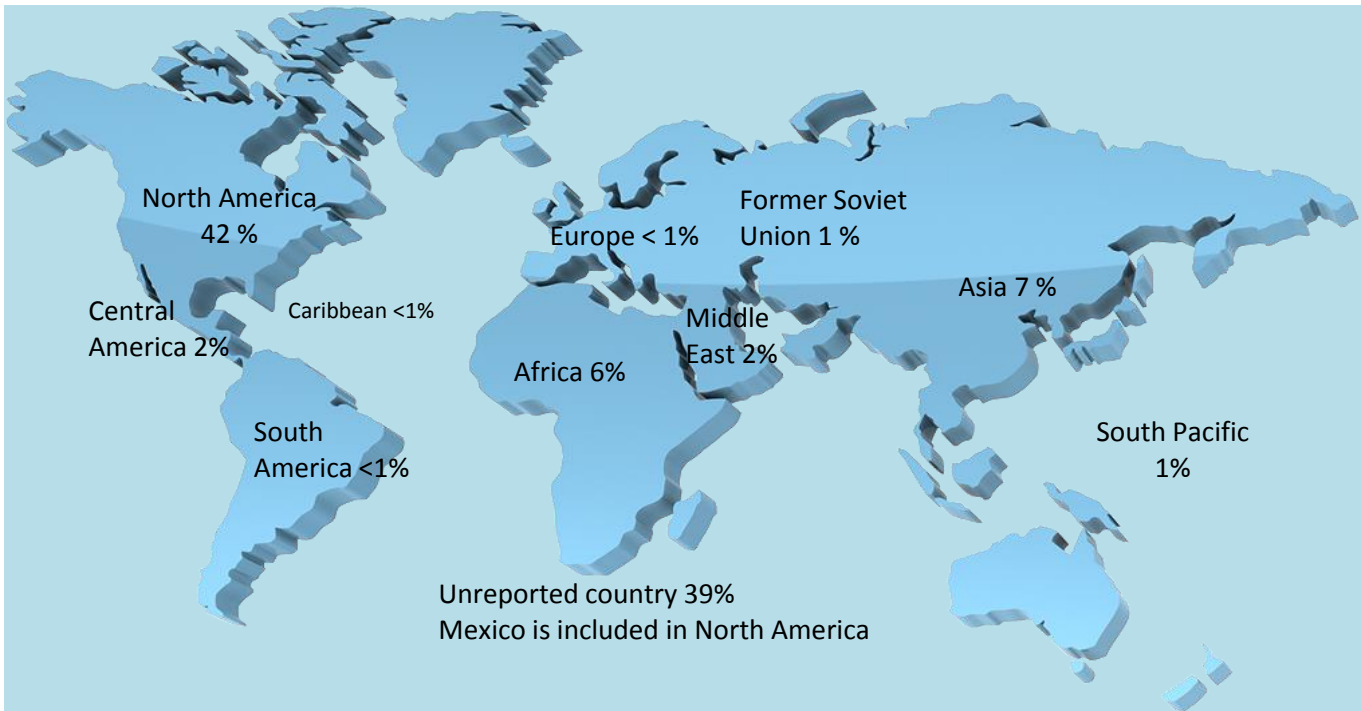
* May include TAG Potential

COUNTRIES OF RECENT ARRIVERS 2014-15

Country	N
Afghanistan	4
Angola	1
Argentina, Republic of	1
Australia, Commonwealth of	6
Austria, Republic of	3
Bangladesh, People's Republic of	2
Belize	1
Bhutan, Kingdom of	1
Botswana, Republic of	3
Brazil, Federative Republic of	4
Bulgaria	1
Burma, Socialist Republic of the Union	5
Cambodia, Kingdom of	1
Canada	10
Central African Republic	3
Chad, Republic of	2
Chile, Republic of	2
China, People's Republic of	94
Colombia, Republic of	2
Congo, Democratic Republic of the	11
Congo, People's Republic of	3
Costa Rica, Republic of	1
Cuba, Republic of	8
Czech Republic	1
Denmark, Kingdom of	2
Egypt, Arab Republic of	1
El Salvador, Republic of	5
Eritrea	7
Ethiopia	37
Fiji	3
Finland, Republic of	2
France, French Republic	5
Gabon	1
Georgia	1
Germany	9
Ghana, Republic of	5
Great Britain	10
Guatemala, Republic of	43
Haiti, Republic of	1
Honduras, Republic of	7
Hong Kong	2
India, Republic of	9
Iran, Islamic Republic	1
Iraq, Republic of	27
Ireland	1
Israel, State of	7
Italy, Italian Republic	11
Ivory Coast	3
Japan	27
Jordan, Hashemite Kingdom of	2
Kazakhstan	2
Kenya, Republic of	19
Korea, Democratic People's Rep	16

Country	N
Lao People's Democratic Republic	1
Lebanon, Republic of	1
Liberia, Republic of	1
Libyan Arab Jamahiriya	13
Mexico	50
Micronesia, Federated States of	2
Moldova, Republic of	2
Morocco, Kingdom of	2
Namibia	3
Nepal, Kingdom of	4
Netherlands, Kingdom of the	8
New Zealand	1
Nicaragua, Republic of	1
Nigeria, Federal Republic of	1
Norway, Kingdom	3
Oman, Sultanate of	1
Pakistan, Islamic Republic of	1
Palau	3
Paraguay, Republic of	3
Peru, Republic of	1
Philippines, Republic of the	11
Puerto Rico	1
Qatar, State of	1
Romania, Socialist Republic of	3
Russia, Federation of	5
Rwanda, Republic of	6
Saudi Arabia, Kingdom of	28
Senegal, Republic of	1
Sierra Leone, Republic of	3
Somalia, Democratic Republic of	16
South Africa, Republic of	4
Spain	1
Sudan, Democratic Republic of	4
Sweden, Kingdom of	2
Switzerland, Confederation of	3
Syrian Arab Republic	7
Taiwan, Province of China	7
Tanzania, United Republic of	6
Thailand, Kingdom of	24
Togo, Republic of	1
Tonga, Kingdom of	2
Tunisia, Republic of	1
Turkey	1
Uganda, Republic of	9
Ukraine	4
United Kingdom	9
Unknown or Unspecified	53
Viet Nam, Socialist Republic of	84
Yemen	2
Zambia, Republic of	1
Zimbabwe	1
Total	839

Where are our students from:



Attachment G

LIFT FACILITY RELOCATION EQUITY ANALYSIS



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

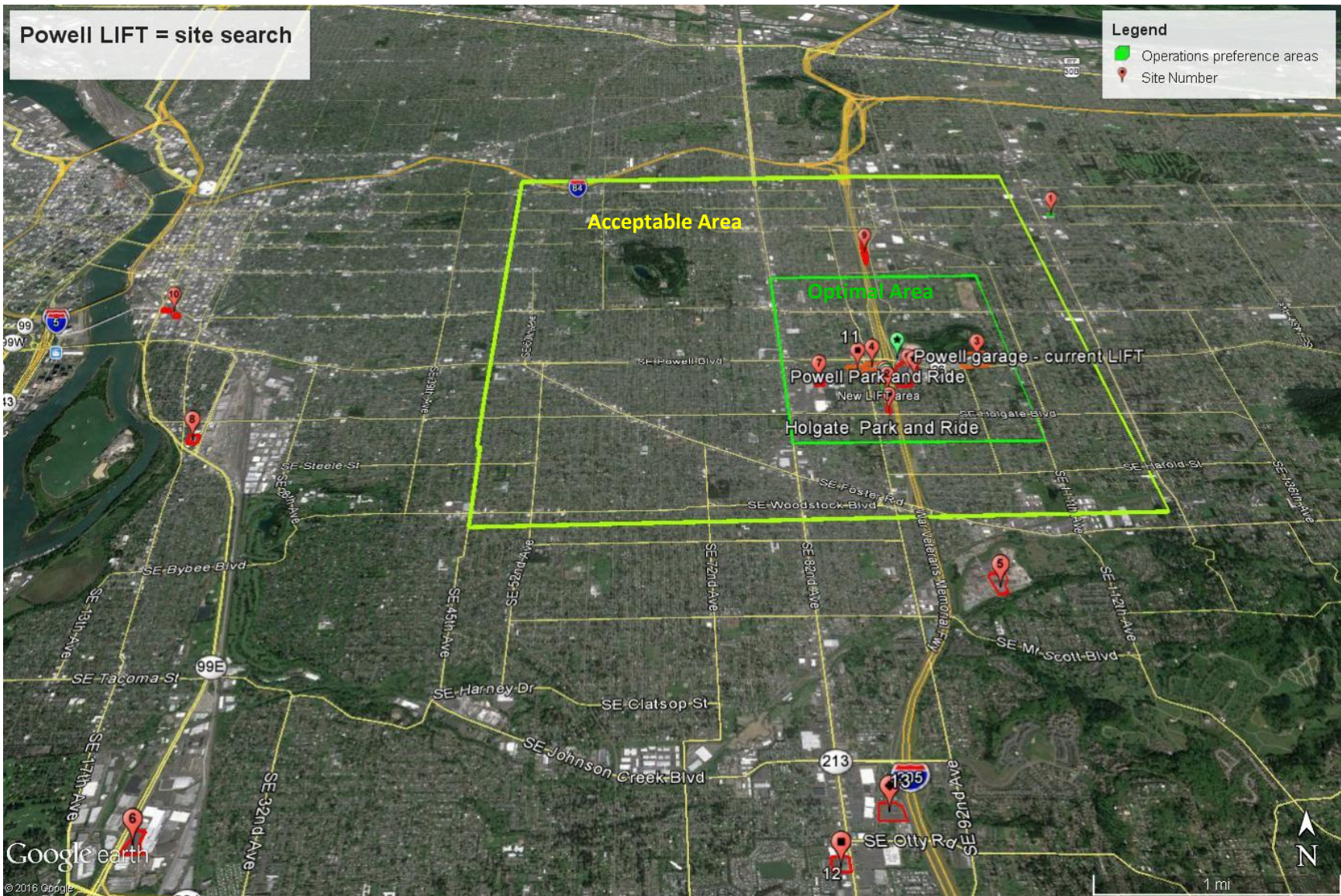


Figure 1: Potential LIFT facility sites identified by ATP department

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

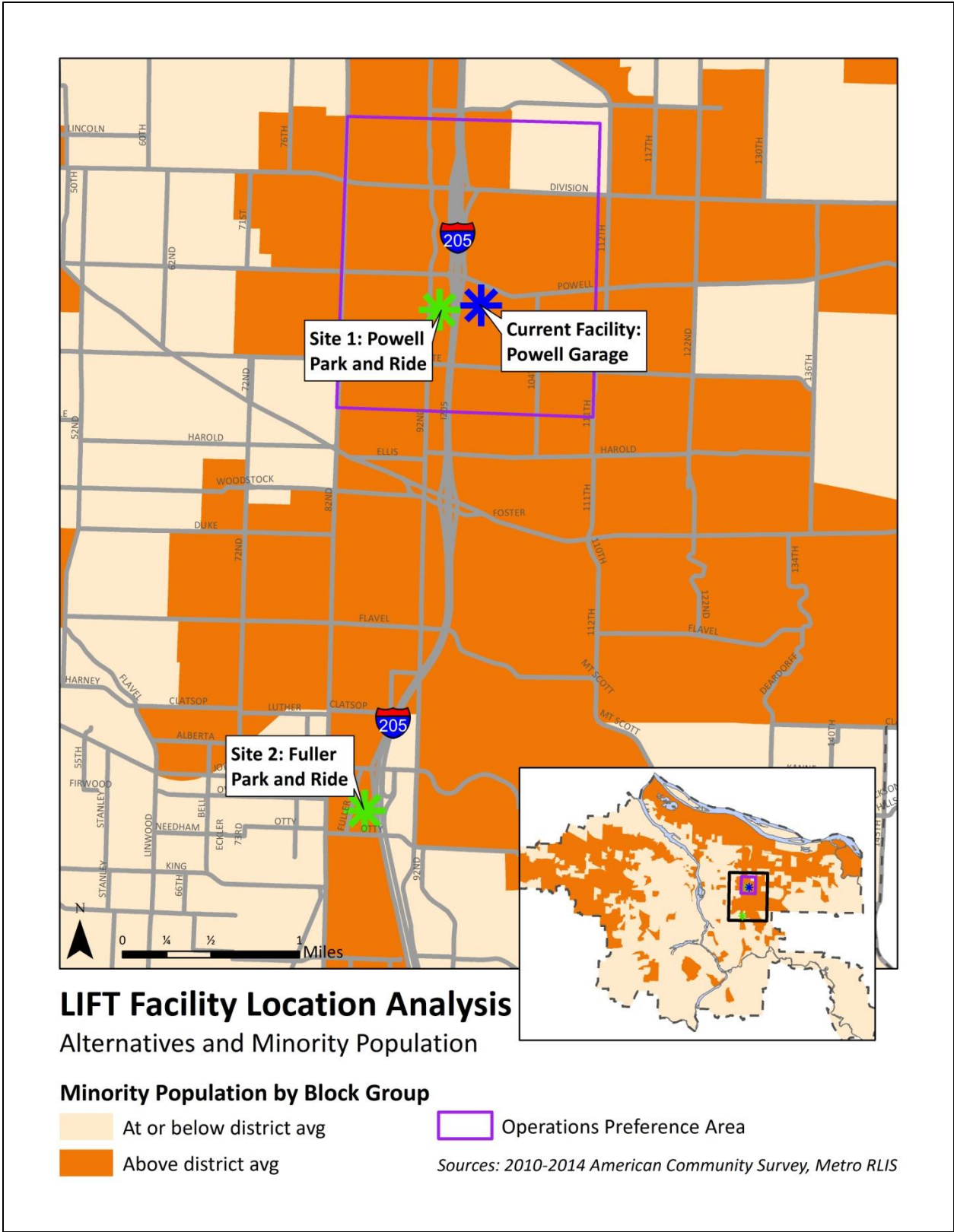


Figure 2: Potential LIFT facility sites and minority population

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

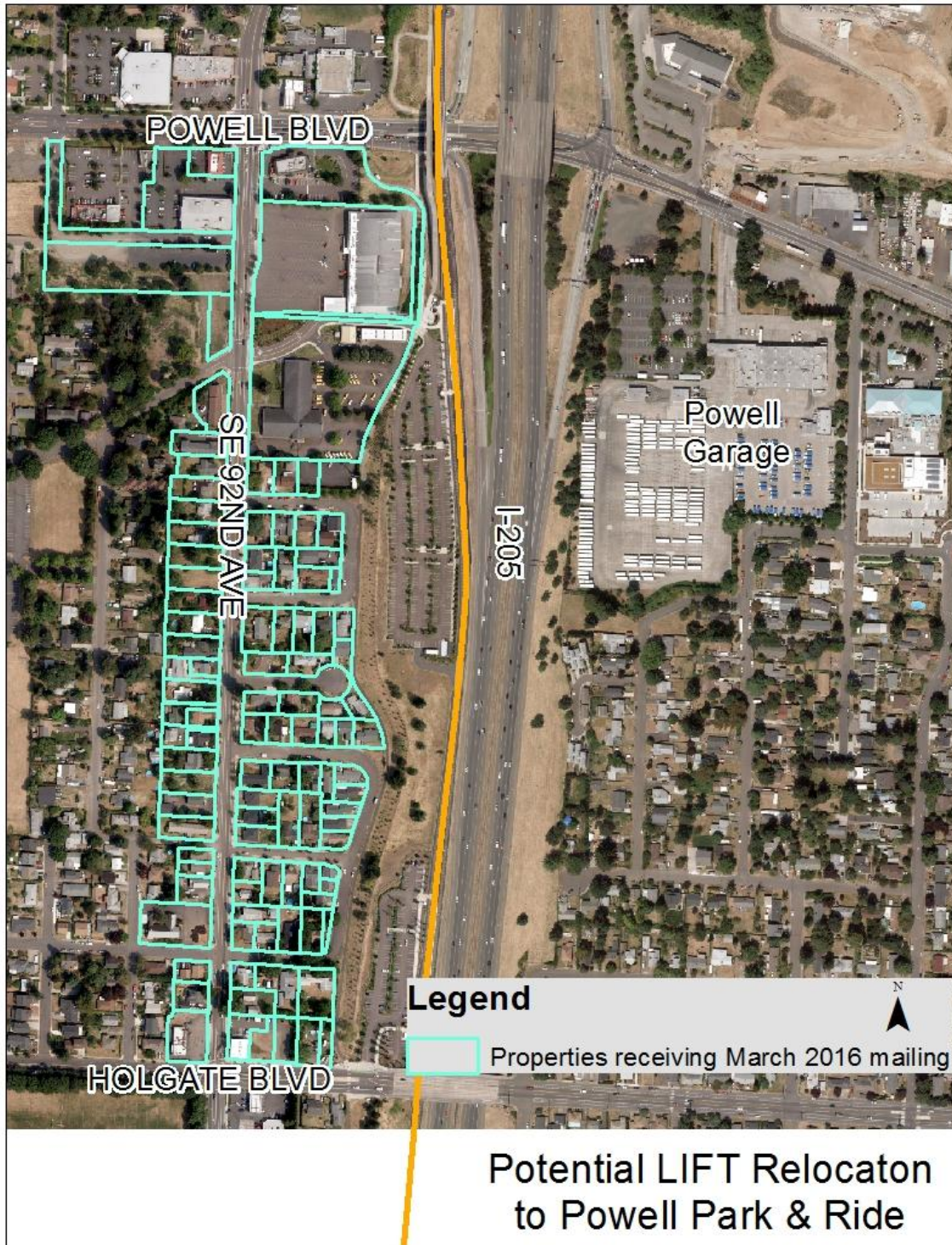
This equity analysis has aimed to guide TriMet on selecting a LIFT facility location that does not result in disparate impacts on the basis of race, color, or national origin. The process by which TriMet identified and narrowed down potential sites for the facility was based on property size, geographic 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



Attachment H

FALL 2014 FARE AND SERVICE CHANGE EQUITY ANALYSIS, WITH
DOCUMENTATION OF BOARD APPROVAL



Fall 2014 Fare & Service Change Equity Analysis Report

FINAL

Department of Diversity & Transit Equity

May 22, 2014

I. Background

TriMet’s proposed FY2015 budget includes a fare reduction for youth riders and an agreement to subsidize TriMet passes for Portland Public Schools high school students. It also includes provisions for improving reliability and capacity on several bus lines, as well as investments in the Frequent Service Network, beginning in fall 2014. As a recipient of Federal financial assistance, TriMet must ensure that major service changes and any fare change comply with Title VI of the Civil Rights Act of 1964, which states:

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

The Federal Transit Administration (FTA) has specific implementing guidelines and regulations for complying with Title VI, which it has provided in Circular 4702.1B. The mechanism by which transit agencies evaluate for potential Title VI issues is a service/fare equity analysis. Figure 1 below shows the steps taken in the equity analysis process.

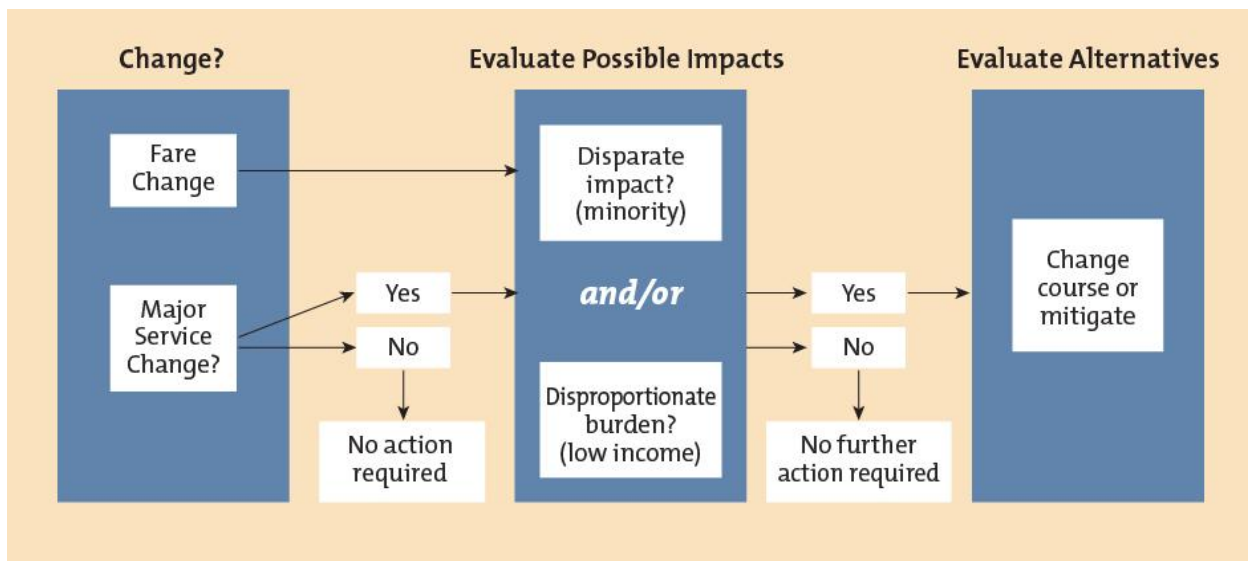


Figure 1: Overview of Title VI Equity Analysis

II. TriMet Title VI Compliance

In the fall of 2013, TriMet updated its Title VI Program, which received concurrence by the Federal Transit Administration (FTA) in January 2014. The program outlines agency policies, definitions and procedures for complying with Title VI and performing equity analyses. This includes the agency's major service change, disparate impact, and disproportionate burden policies.

A. Major Service Change Policy

All changes in service meeting the definition of "Major Service Change" are subject to a Title VI Equity Analysis prior to Board approval of the service change. A Title VI Equity Analysis will be completed for all major service changes and will be presented to the 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 as defined in the Introduction of TriMet's Title VI Program.
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.

B. Disparate Impact Policy

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

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.

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.

For lines with major service changes, if the percentage of minority population in tracts served by the impacted portion of the line (sum of minority population in all impacted tracts divided by the total population in all impacted tracts) exceeds the percentage of minority population in the TriMet District as a whole, the impacts of changes to the line will be considered disparate.

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 (sum of minority population in all impacted tracts divided by the minority population of the TriMet District as a whole) is compared to the percentage of impacted non-minority population (sum of non-minority population in all impacted tracts divided by the non-minority population of

the TriMet District as a whole). Comparisons of impacts between minority and non-minority 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.

C. Disproportionate Burden Policy

Testing for “disproportionate burden” evaluates potential effects on low-income populations. The fare, line, and system level evaluations are identical to those used to determine potential disparate impacts, but comparing low-income – defined as at or below 150% of the federal poverty level – and higher income rather than minority and non-minority populations

D. Major Service Change Policy – Administrative Test

Additionally, TriMet is currently testing more stringent standards than described under section II-A above in order to respond to feedback received from community members and the Transit Equity Advisory Committee. These test standards are as follows (changes italicized):

1. A change in service of:
 - a. *10 percent* or more of the number of route miles, or;
 - b. *10 percent* or more of the number of revenue vehicle hours of service *due to a change in span* on a daily basis for the day of the week for which a change is made, or;
 - c. *25 percent* or more of the number of revenue vehicle hours of service *due to a change in frequency* on a daily basis for the day of the week for which a change is made.

III. Proposed Fare Changes for Fall 2014

A. Description of Changes

TriMet is proposing a fare package that would reduce fares for youth riders, as well as continue a program that provides transit passes to Portland Public Schools high school students at no cost to them. A review of peer transit agencies found that TriMet’s youth fares were generally higher than its peers, so the agency aims to better align itself with industry best practices.

Youth Fare Reductions

TriMet is proposing changing pricing for regular youth fares, effective September 1, 2014:

Table 1: Proposed fare changes, effective September 1, 2014

	Current Fare	New Fare
Youth Single Fare (cash/ticket)	\$1.65	\$1.25
Youth 1-day Pass	\$3.30	\$2.50
Youth 7-day Pass	\$8.00	\$7.50

Youth 14-day Pass	\$15.50	\$14.50
Youth Monthly/30-day Pass	\$30.00	\$28.00
Youth Annual Pass	\$330.00	\$308.00

Portland Public Schools Student Pass

High school students within the Portland Public Schools (PPS) district have received TriMet passes free of charge since 2009 because PPS does not offer yellow bus service to high school students. Historically, this Student Pass Program was funded through the State of Oregon’s Business Energy Tax Credit (BETC) program, as well as contributions from PPS. Due to action by the State Legislature, however, BETC funding was discontinued and no longer available for student passes beginning in 2011. From this time through the 2013-14 school year, TriMet, the City of Portland (City) and PPS were able to agree to short term funding arrangements to cover the cost of the Program on a year-by-year basis.

In May 2014, a tentative intergovernmental agreement among TriMet, PPS, and the City was reached to continue providing TriMet passes for all students attending PPS high schools free of charge for the 2014-15 school year, with the cost shared evenly among the three jurisdictions. Because this spans a ten month period, TriMet is conducting a fare equity analysis per the guidelines in FTA Circular 4702.1B¹

B. Disparate Impact Test

The 2012 TriMet on-board Fare Survey (survey instrument attached in Appendix A) collected fare payment and demographic data necessary to conduct a fare equity analysis consistent with the policies described above. As shown in Table 2 and Figure 2, fares paid by minority youth are most commonly single fares (cash or ticket) (35%), followed by PPS Student Pass (33%), and monthly/30-Day passes (26%). Fares paid by non-minority youth show a different pattern, with PPS Student Pass as the most common (39%), followed by monthly/30-day passes (32%) and single fares (25%).

Table 2: Proposed fare changes and usage by race/ethnicity
2012 TriMet Fare Survey

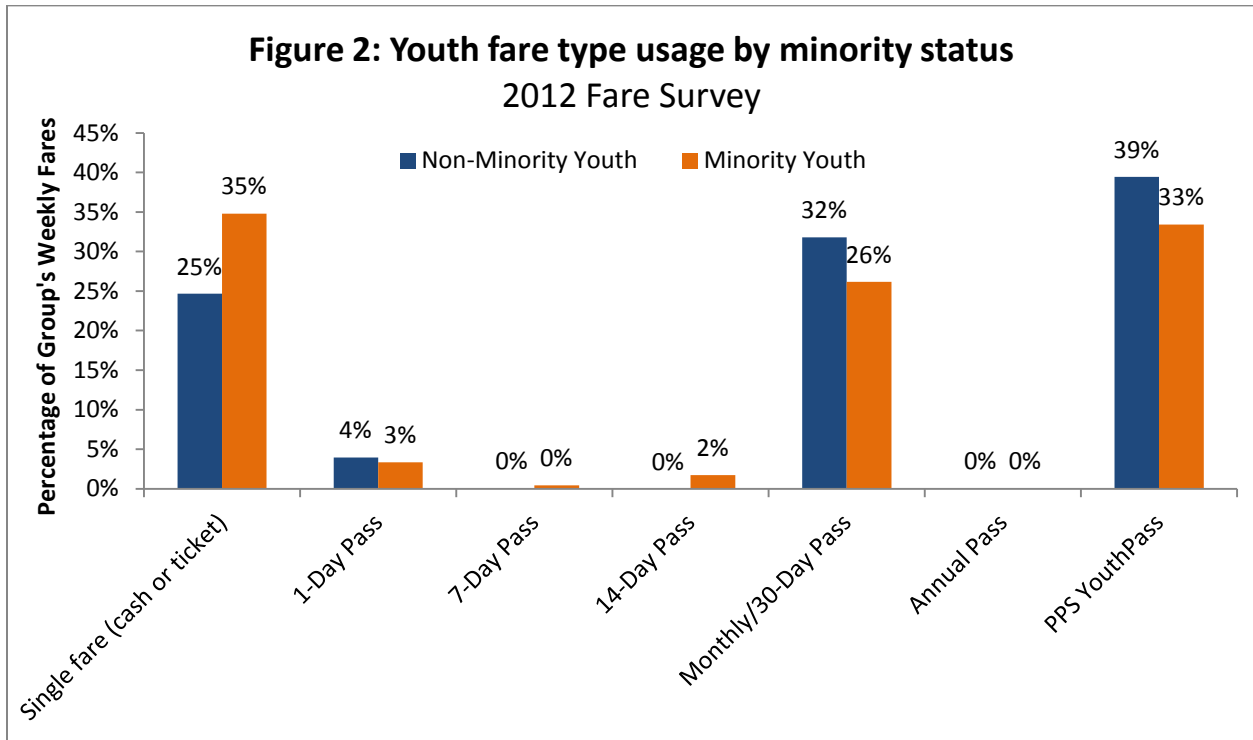
Fare media	Current Fare	New Fare	Fare change Pct.	Non-minority Weekly¹ Pct.	Minority Weekly Pct.
Youth Single fare (cash or ticket)	\$1.65	\$1.25	-24%	25%²	35%
Youth 1-Day Pass	\$3.30	\$2.50	-24%	4%	3%
Youth 7-Day Pass	\$8.00	\$7.50	-6%	0%	0%
Youth 14-Day Pass	\$15.50	\$14.50	-6%	0%	2%
Youth Monthly/30-Day Pass	\$30	\$28	-7%	32%	26%
Youth Annual Pass	\$330	\$308	-7%	0%	0%
PPS Student Pass	N/A	N/A	N/A	39%	33%
Total				100%	100%

¹ Under FTA Circular 4702.1B Chapter IV-19, b. Fare Equity Analysis, (a) Exceptions, “(iii) *Promotional fare reductions. If a promotional or temporary fare reduction lasts longer than six months, then FTA considers the fare reduction permanent and the transit provider must conduct a fare equity analysis.*”

¹Fare usage weighted to reflect distribution over the course of an average week

²**Bold** = statistically significant difference at 95% confidence level

Expanded to weekly boarding rides: Minority, n=94,425; Non-minority, n=94,568



Because the proposal is to reduce all youth fares, and to continue to provide TriMet passes to PPS high school students, there is no potential adverse effect on youth fare and PPS high school pass users. Thus the focus for this analysis is on the potential benefits rather than adverse effects. That is, there could be a possible disparate impact if minority youth were being limited or denied the benefits of the fare policy proposal in comparison to non-minority youth. The data indicates that, compared to non-minority youth, minority youth fare users are:

- a. More likely to use single fare (cash or ticket),
- b. Less likely to use monthly/30-day passes, and
- c. Less likely to use PPS Student Passes.

The fact that the proposal aims to reduce single fares (cash or ticket) by 24% and monthly/30-day passes by 7% implies a proportionally greater benefit to minority youth than non-minority youth in terms of percentage cost reduction. Regarding finding (c) above, the PPS Student Pass program was established because PPS is the only school district within the TriMet service district that has received a waiver from the Oregon Department of Education, exempting the district from providing yellow bus service for its high school students. TriMet also will be exploring the possibility of establishing similar partnerships with other school districts in the region.

Thus, in the context of this proposed package of Youth fare changes, the available data and the analysis show no potential disparate impacts on minority youth.

C. Disproportionate Burden Test

Table 3 and Figure 3 on the next page compare fare type usage by low-income (at or below 150% of the federal poverty level) and higher income (above 150% of the federal poverty level) youth². Fares paid by low-income youth are about equally as likely to be single fares (cash or ticket) or monthly/30-Day passes (35% and 32% of weekly fares paid, respectively). Next is the PPS Student Pass, which comprises 26% of low-income youth fares. On the other hand, fares paid by higher income youth are most likely to be PPS Student Passes (46%), followed by single fares (cash or ticket) (28%) and monthly/30-day passes (22%).

As with the disparate impact test, there could be a potential disproportionate burden if low-income youth were being limited or denied the benefits of the fare policy proposal in comparison to higher income youth. The data indicates that, compared to higher income youth fares, low-income youth fare users are:

- a. More likely to use single fares (cash or ticket),
- b. More likely to -use monthly/30-day passes, and
- c. Less likely to use PPS student passes.

Findings (a) and (b) imply that low-income youth would receive an equal-or-greater benefit than higher income youth under the Youth fare reduction proposal. Regarding finding (c) above, the PPS Student Pass program was established because PPS is the only school district within the TriMet service district that does not provide yellow bus service for its high school students. TriMet also will be exploring the possibility of establishing similar partnerships with other school districts in the region.

Thus, in the context of this proposed package of Youth fare changes, the available data and the analysis show no potential disproportionate burden on low-income youth.

² A caveat to analyzing this data is that surveyed youth may not always know their household's income. Results, therefore, should be considered with that in mind.

Table 3: Proposed fare changes and fare usage by income level
2012 TriMet Fare Survey

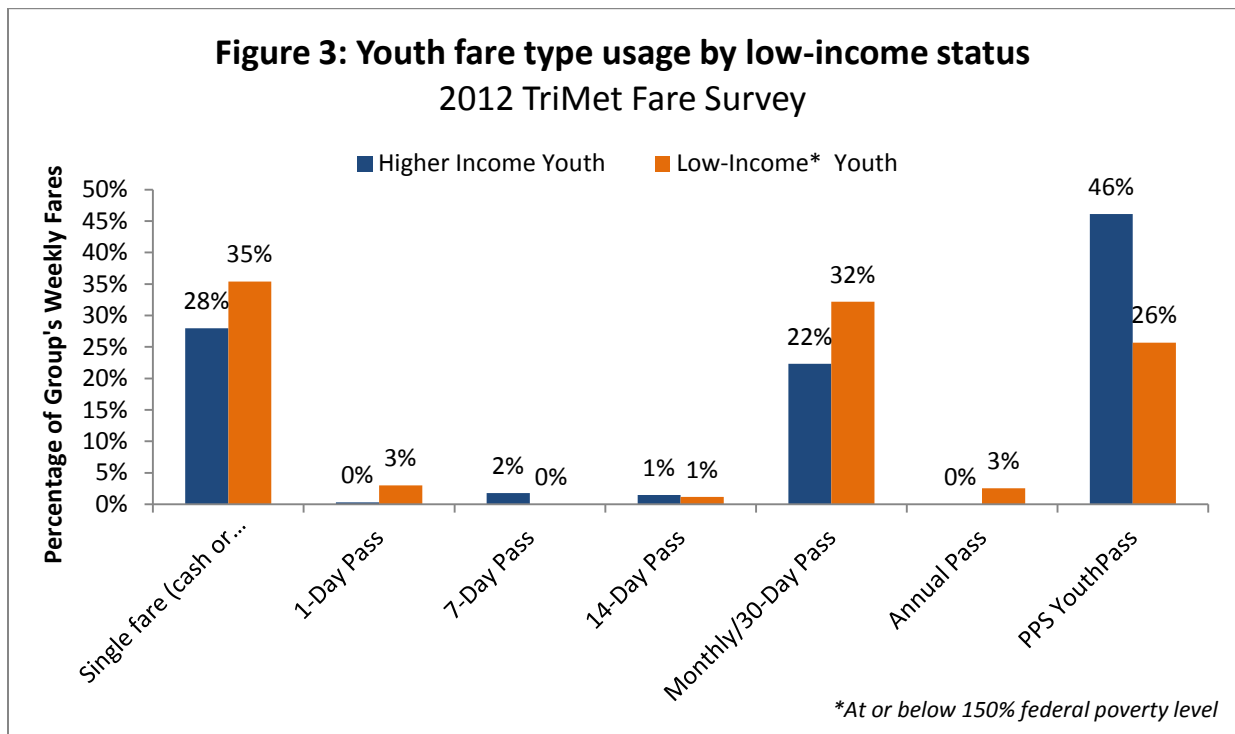
Fare media	Current Fare	New Fare	Fare change Pct.	Higher Income Weekly ¹ Pct.	Low-Income ² Weekly Pct.
Youth Single fare (cash or ticket)	\$1.65	\$1.25	-24%	28% ³	35%
Youth 1-Day Pass	\$3.30	\$2.50	-24%	0%	3%
Youth 7-Day Pass	\$8.00	\$7.50	-6%	2%	0%
Youth 14-Day Pass	\$15.50	\$14.50	-6%	1%	1%
Youth Monthly/30-Day Pass	\$30	\$28	-7%	22%	32%
Youth Annual Pass	\$330	\$308	-7%	0%	3%
PPS Student Pass	N/A	N/A	N/A	46%	26%
Total				100%	100%

¹Fare usage weighted to reflect distribution over the course of an average week

²Low-income defined as at or below 150% federal poverty

³**Bold** = statistically significant difference between columns at 95% confidence level

Expanded to weekly boarding rides: Low-income, n=36,082; Higher income, n=39,836



IV. Fare Equity Analysis Conclusions

Proposed fare changes require a fare equity analysis to identify any potential disparate impacts on minority riders and/or disproportionate burden on low-income riders. The fare equity analysis found:

- **No potential disparate impact** on minority youth riders associated with reducing youth fares and continuing the PPS Student Pass program.
- **No potential disproportionate burden** on low-income youth riders associated with reducing youth fares and continuing the PPS Student Pass program.

The proposed fare package would make transit more affordable for youth and families throughout the Portland metropolitan region. This analysis has aimed to ensure that minority and low-income youth will not be limited or denied the benefits of the proposed fare changes.

V. Proposed Service Changes for Fall 2014

A. Description of Changes

TriMet has had to implement significant service cuts over the last several years due to the budget impacts of the Great Recession. With economic conditions improving and revenues returning to levels seen before the downturn, TriMet can begin to restore transit service that has been cut.

Working with community stakeholders, the agency identified restoring service on its branded Frequent Service Network as a top priority once funds were available. The first iteration of this restoration process occurred in spring 2014 with restoration of Frequent Bus service during the midday period on weekdays. The next phase, proposed for implementation in fall 2014, would restore Frequent Bus and MAX light rail service weekday evenings.

In addition to restoration of Frequent Service on weekday evenings, fall 2014 service proposals include improvements to bus service in order to maintain the system's operability in terms of capacity (crowding) and on-time performance (reliability).

Table 4 on the next page shows the specific service changes staff is proposing to take effect September 1, 2014.

Table 4: Proposed Fall 2014 service changes. Applies to weekdays only and Fall 2014, except where noted.

Line	Weekday Evening Frequent Service	Capacity Improvements	Reliability Improvements
4-Division/Fessenden			
6-Martin Luther King Jr Blvd			
8-Jackson Park/NE 15th			
9-Powell Blvd			
10-Harold St			
12-Barbur/Sandy Blvd			
14-Hawthorne			
15-Belmont/NW 23rd			
20-Burnside/Stark			
33-McLoughlin			
44-Capitol Hwy/Mocks Crest			
54/56-Beaverton-Hillsdale Hwy/Scholls Ferry Rd			
57-TV Hwy/Forest Grove			
71-60 th /122 nd Ave			Summer 2014
75-Cesar Chavez/Lombard			Sat/Sun
76-Beaverton/Tualatin		Sat	
78- Beaverton/Lake Oswego		Sat	
87-Airport Way/181 st			
94-Pacific Hwy/Sherwood			
99-McLoughlin Express			
MAX Blue Line			
MAX Green Line			
MAX Red Line			
MAX Yellow Line			

B. Major Service Change Definition - Test

Table 5 on the next page shows the results of calculating the estimated percentage change in revenue hours by line and day (weekday, Saturday, Sunday) to determine whether any changes meet TriMet's adopted definition of a "major service change." **None of the proposed changes on any line meet or exceed the threshold of "major service change," as defined in TriMet's Title VI policies, and therefore an assessment of potential disparate impact and/or disproportionate burden are not required.** It is also noteworthy that none of the proposed changes is a reduction of service, and none of the changes have any potential adverse effect on riders.

Additionally, no changes meet the test administrative standards that differentiate between changes to frequency (25% standard for major service change) and span (10% standard). There are no proposed changes in route length. Not included in this list are reliability improvements, which do not need to be tested because neither the frequency nor the span of service would be changed; reliability improvements entail adjusting schedules or other actions to improve on-time performance.

Table 5: Change of revenue service hours by line

Line	Est. Change in Daily Revenue Hrs (Number)	Est. Change in Daily Revenue Hours (%)	Change to Frequency, Span, or Both?
4-Division/Fessenden	3.6	1%	Frequency
6-Martin Luther King Jr Blvd	1.0	1%	Frequency
8-Jackson Park/NE 15th	1.9	2%	Frequency
9-Powell Blvd	3.3	2%	Frequency
10-Harold St	1.2	2%	Frequency
12-Barbur/Sandy Blvd	1.9	1%	Frequency
14-Hawthorne	1.9	2%	Frequency
15-Belmont/NW 23rd	3.3	2%	Frequency
20-Burnside/Stark	9.5	5%	Frequency
33-McLoughlin	6.1	3%	Both
44-Capitol Hwy/Mocks Crest	2.2	2%	Frequency
54/56-Beaverton-Hillsdale Hwy/Scholls Ferry Rd	0.9	1%	Frequency
57-TV Hwy/Forest Grove	1.8	1%	Frequency
75-Cesar Chavez/Lombard	2.8	1%	Frequency
76-Beaverton/Tualatin	4.3	11%	Frequency
78-Beaverton/Lake Oswego	3.5	8%	Frequency
94-Pacific Hwy/Sherwood	5.1	8%	Frequency
99-McLoughlin Express	1.8	11%	Frequency
MAX Blue Line	1.0	0%	Frequency
MAX Green Line	4.9	5%	Frequency
MAX Red Line	1.0	1%	Frequency
MAX Yellow Line	2.6	3%	Frequency

APPENDIX A: Fall 2012 TriMet on-board fare survey questionnaire

TriMet Rider Survey

Please fill out this form even if you have already received one on another bus or train.

Dear Rider: TriMet would like to know about the trip you are currently making. Please answer the following questions and return to the surveyor or drop it in the mail.

1. What line are you riding on now? Line # _____ Line name _____							
2. Do you have to transfer to or from a different line to make this trip in one direction? 01 <input type="checkbox"/> No <input type="checkbox"/> Yes. If Yes, how many times? 02 <input type="checkbox"/> 1 time 03 <input type="checkbox"/> 2 times 04 <input type="checkbox"/> 3 or more times							
3. If you must transfer to make this trip, what lines do you transfer to or from? (not including the bus or train you are on now) Line # _____ Line name _____ Line # _____ Line name _____ <input type="checkbox"/> MAX <input type="checkbox"/> WES <input type="checkbox"/> Portland Streetcar <input type="checkbox"/> C-TRAN route # _____ <input type="checkbox"/> SAM Transit _____							
4. How did you pay your fare for this trip? (check one) 01 <input type="checkbox"/> TriMet fare 02 <input type="checkbox"/> C-TRAN fare 03 <input type="checkbox"/> Portland Streetcar fare If Streetcar, which type of fare? 01 <input type="checkbox"/> 2-Hour Ticket (\$1) 02 <input type="checkbox"/> Portland Streetcar Annual Pass (\$150)							
5. Which TriMet fare? (Please check one)							
	01 CASH (2-Hr Ticket)	02 TICKET (Book of 10)	03 1-DAY PASS	04 7-DAY PASS	05 14-DAY PASS	06 MONTHLY/ 30-Day PASS	07 ANNUAL PASS
Adult	01 <input type="checkbox"/> \$2.50	01 <input type="checkbox"/> \$25.00	01 <input type="checkbox"/> \$5.00	01 <input type="checkbox"/> \$26.00	01 <input type="checkbox"/> \$51.00	01 <input type="checkbox"/> \$100.00	01 <input type="checkbox"/> \$1,100.00
Youth/Student	02 <input type="checkbox"/> \$1.65	02 <input type="checkbox"/> \$16.50	02 <input type="checkbox"/> \$3.30	02 <input type="checkbox"/> \$ 8.00	02 <input type="checkbox"/> \$15.50	02 <input type="checkbox"/> \$ 30.00	02 <input type="checkbox"/> \$ 330.00
Honored Citizen/STAR	03 <input type="checkbox"/> \$1.00	03 <input type="checkbox"/> \$10.00	03 <input type="checkbox"/> \$2.00	03 <input type="checkbox"/> \$ 7.00	03 <input type="checkbox"/> \$13.50	03 <input type="checkbox"/> \$ 26.00	03 <input type="checkbox"/> \$ 286.00
LIFT	04 <input type="checkbox"/> \$2.15	04 <input type="checkbox"/> \$21.50			04 <input type="checkbox"/> \$31.50	04 <input type="checkbox"/> \$ 62.00	04 <input type="checkbox"/> \$ 682.00
05 <input type="checkbox"/> Employee ID with TriMet sticker							
06 <input type="checkbox"/> College ID with TriMet sticker							
07 <input type="checkbox"/> High school ID with TriMet sticker and/or embedded with TriMet logo							
08 <input type="checkbox"/> Honored Citizen Downtown Pass							
09 <input type="checkbox"/> Other _____							
6. Is your single-fare payment being used for a one-way or a round-trip? 01 <input type="checkbox"/> One-way trip 02 <input type="checkbox"/> Round-trip							
7. If you are using a 1-Day Pass, how many one-way trips will you make on it today? _____							
8. Where did you buy your fare for this trip?							
01 <input type="checkbox"/> Onboard the bus		05 <input type="checkbox"/> Pass by Mail		09 <input type="checkbox"/> Social Service Agency Purchased for me			
02 <input type="checkbox"/> Ticket Vending Machine		06 <input type="checkbox"/> School or Place of Employment		10 <input type="checkbox"/> Other _____			
03 <input type="checkbox"/> TriMet Ticket Office		07 <input type="checkbox"/> Online					
04 <input type="checkbox"/> Retail Store		08 <input type="checkbox"/> Purchased on Streetcar					
9. Do you have a vehicle you could have used to make this trip either as the driver or as a passenger? 01 <input type="checkbox"/> Yes 02 <input type="checkbox"/> No							
10. Do you have a checking or savings account? 01 <input type="checkbox"/> Yes 02 <input type="checkbox"/> No							
11. Do you have or use a pre-paid or regular debit or credit card?							
01 <input type="checkbox"/> Yes (check all that apply)		01 <input type="checkbox"/> Pre-paid card		02 <input type="checkbox"/> Bank-issued debit card		03 <input type="checkbox"/> Bank-issued credit card	
02 <input type="checkbox"/> No							
12. Including yourself, how many people live in your household? _____							
13. How many trips have you taken on a TriMet bus/MAX in the last month? (count each direction as one trip) _____							
14. What is your age? _____							
15. Are you a college student? 01 <input type="checkbox"/> Yes, full-time 02 <input type="checkbox"/> Yes, part-time 03 <input type="checkbox"/> No							
If you are a college student, which college?		01 <input type="checkbox"/> PSU		02 <input type="checkbox"/> PCC		03 <input type="checkbox"/> Other _____	
16. Are you: (check one) 01 <input type="checkbox"/> Asian/Pacific Islander 03 <input type="checkbox"/> Caucasian/White 05 <input type="checkbox"/> Multi-racial/bi-racial 07 <input type="checkbox"/> Other _____							
		02 <input type="checkbox"/> African American/Black		04 <input type="checkbox"/> Hispanic/Latino		06 <input type="checkbox"/> Native American Indian	
17. What was your total annual household income before taxes in 2011? (check one)							
01 <input type="checkbox"/> Under \$10,000		03 <input type="checkbox"/> \$20,000 to \$29,999		05 <input type="checkbox"/> \$40,000 to \$49,999		07 <input type="checkbox"/> \$60,000 to \$69,999	
02 <input type="checkbox"/> \$10,000 to \$19,999		04 <input type="checkbox"/> \$30,000 to \$39,999		06 <input type="checkbox"/> \$50,000 to \$59,999		08 <input type="checkbox"/> \$70,000 or more	
18. Do you speak a language other than English at home? 01 <input type="checkbox"/> Yes If yes, what language is this? _____ 02 <input type="checkbox"/> No							
Quý vị có nói một ngôn ngữ nào khác ngoài tiếng Anh ở nhà không?				05 <input type="checkbox"/> Có		06 <input type="checkbox"/> Không	
除了英文外，您在家還說其他的語言嗎？				07 <input type="checkbox"/> 是		08 <input type="checkbox"/> 否	
Разговариваете ли вы на каком-либо еще языке, кроме английского, дома?				09 <input type="checkbox"/> Да		10 <input type="checkbox"/> Нет	
집에서 영어가 아닌 다른 언어를 사용하십니까?				11 <input type="checkbox"/> 예		12 <input type="checkbox"/> 아니오	
19. How well do you speak English? 01 <input type="checkbox"/> Very well 02 <input type="checkbox"/> Well 03 <input type="checkbox"/> Not well 04 <input type="checkbox"/> Not at all							
Quý vị nói tiếng Anh khá không?		09 <input type="checkbox"/> Rất khá		10 <input type="checkbox"/> Khá		11 <input type="checkbox"/> Không khá	
您說英文的程度如何？		13 <input type="checkbox"/> 非常好		14 <input type="checkbox"/> 好		15 <input type="checkbox"/> 好	
Как хорошо вы разговариваете на английском языке?		17 <input type="checkbox"/> Очень хорошо		18 <input type="checkbox"/> Достаточно хорошо		19 <input type="checkbox"/> Не очень хорошо	
영어로 어느 정도로 잘 구사하십니까?		21 <input type="checkbox"/> 대단히 잘한다		22 <input type="checkbox"/> 잘한다		23 <input type="checkbox"/> 잘하지 못한다	
						20 <input type="checkbox"/> Вообще не говорю	
						24 <input type="checkbox"/> 전혀 하지 못한다	

Please return to surveyor or fold, tape 1" from each edge and mail postage-paid. Thank you for taking time to fill out this survey.



BUSINESS REPLY MAIL

FIRST-CLASS MAIL PERMIT NO. 596 PORTLAND OR

POSTAGE WILL BE PAID BY THE ADDRESSEE

TRIMET
ATTN: FINANCIAL PLANNING
4012 S.E. 17TH AVENUE
PORTLAND, OR 97202-9911



Encuesta a los pasajeros de TriMet

Favor de llenar este formulario aún si ya lo recibió en otro tren o autobús.

Estimado Pasajero: TriMet necesita saber algunos datos sobre el viaje que hace en estos momentos. Favor de contestar las siguientes preguntas. Cuando termine entrégueselas al encuestador o envíelas por correo.

1. ¿En que línea viaja en estos momentos?		Línea # _____	Nombre de la ruta/línea _____					
2. ¿Necesita hacer trasbordos de una línea a otra para completar este viaje en una dirección?								
01	<input type="checkbox"/> No	<input type="checkbox"/> Sí. Si la respuesta es sí, ¿cuántas veces?	02	<input type="checkbox"/> 1 vez	03	<input type="checkbox"/> 2 veces	04	<input type="checkbox"/> 3 veces o más
3. Si hace trasbordos en este viaje, ¿de qué líneas a qué líneas trasborda? (no incluya el tren o autobús en que ahora viaja)								
Línea # _____	Nombre de la ruta/línea _____		Línea # _____	Nombre de la ruta/línea _____				
<input type="checkbox"/> MAX	<input type="checkbox"/> WES	<input type="checkbox"/> Portland Streetcar	<input type="checkbox"/> Ruta C-TRAN # _____	<input type="checkbox"/> Transporte SAM _____				
4. ¿Cómo pagó este viaje? (marque una)		01	<input type="checkbox"/> Tarifa de TriMet	02	<input type="checkbox"/> Tarifa de C-TRAN	03	<input type="checkbox"/> Tarifa de Portland Streetcar	
Si pagó pasaje de Streetcar, ¿qué tipo de pasaje?		01	<input type="checkbox"/> Boleto de 2-horas (\$1)	02	<input type="checkbox"/> Pase Anual Portland Streetcar (\$150)			
5. ¿Qué usó para pagar en TriMet? (marque una)								
	01 EFFECTIVO (boleto de 2-horas)	02 BOLETO (talonario de 10)	03 PASE de 1-DÍA	04 PASE de 7-DÍAS	05 PASE de 14-DÍAS	06 PASE de MENSUAL/30-DÍAS	07 PASE ANUAL	
Adultos	01 <input type="checkbox"/> \$2.50	01 <input type="checkbox"/> \$25.00	01 <input type="checkbox"/> \$5.00	01 <input type="checkbox"/> \$26.00	01 <input type="checkbox"/> \$51.00	01 <input type="checkbox"/> \$100.00	01 <input type="checkbox"/> \$1,100.00	
Joven/Estudiante	02 <input type="checkbox"/> \$1.65	02 <input type="checkbox"/> \$16.50	02 <input type="checkbox"/> \$3.30	02 <input type="checkbox"/> \$ 8.00	02 <input type="checkbox"/> \$15.50	02 <input type="checkbox"/> \$ 30.00	02 <input type="checkbox"/> \$ 330.00	
Ciudadano Honorable/STAR	03 <input type="checkbox"/> \$1.00	03 <input type="checkbox"/> \$10.00	03 <input type="checkbox"/> \$2.00	03 <input type="checkbox"/> \$ 7.00	03 <input type="checkbox"/> \$13.50	03 <input type="checkbox"/> \$ 26.00	03 <input type="checkbox"/> \$ 286.00	
LIFT (servicio de transporte para discapacitados)	04 <input type="checkbox"/> \$2.15	04 <input type="checkbox"/> \$21.50		04 <input type="checkbox"/> \$31.50	04 <input type="checkbox"/> \$ 62.00	04 <input type="checkbox"/> \$ 682.00		
05	<input type="checkbox"/> Identificación de empleado con etiqueta de TriMet							
06	<input type="checkbox"/> Identificación de la universidad con etiqueta de TriMet							
07	<input type="checkbox"/> Identificación de Escuela Preparatoria con etiqueta de TriMet							
08	<input type="checkbox"/> Pase de Ciudadano Honorable para el centro de la ciudad							
09	<input type="checkbox"/> Otra _____							
6. Si pagó un solo pasaje, ¿es para un viaje de ida o de ida y vuelta?		01	<input type="checkbox"/> Viaje de ida	02	<input type="checkbox"/> Viaje de ida y vuelta			
7. Si viaja con un pase de 1 día, ¿cuántos viajes sencillos hará con él el día de hoy? _____								
8. ¿Dónde compró su pasaje para este viaje?								
01	<input type="checkbox"/> A bordo del autobús	05	<input type="checkbox"/> Pase por correo	09	<input type="checkbox"/> Una agencia de servicio social lo compró para mí			
02	<input type="checkbox"/> En una máquina expendedora de boletos	06	<input type="checkbox"/> En la escuela o el lugar de trabajo	10	<input type="checkbox"/> Otro _____			
03	<input type="checkbox"/> En una oficina de boletos de TriMet	07	<input type="checkbox"/> En línea					
04	<input type="checkbox"/> En una tienda	08	<input type="checkbox"/> Lo compré en el tranvía					
9. ¿Tiene un vehículo que podría haber usado para hacer este viaje ya sea como conductor o como pasajero?		01	<input type="checkbox"/> Sí	02	<input type="checkbox"/> No			
10. ¿Tiene cuenta bancaria de ahorros o cheques?		01	<input type="checkbox"/> Sí	02	<input type="checkbox"/> No			
11. ¿Tiene o usa tarjeta prepagada, tarjeta de débito o tarjeta de crédito?								
01	<input type="checkbox"/> Sí (marque todo lo que aplica)	01	<input type="checkbox"/> Tarjeta prepagada	02	<input type="checkbox"/> Tarjeta bancaria de débito	03	<input type="checkbox"/> Tarjeta bancaria de crédito	
02	<input type="checkbox"/> No							
12. Incluyendo a usted, ¿Cuántas personas viven en su hogar? _____								
13. En los últimos 30 días, ¿cuántas veces se ha transportado en autobuses de TriMet/MAX? (cuenta cada dirección como un recorrido) _____								
14. ¿Cuál es su edad? _____								
15. ¿Es Ud. estudiante universitario?		01	<input type="checkbox"/> Sí, a tiempo completo	02	<input type="checkbox"/> Sí, a medio tiempo	03	<input type="checkbox"/> No	
Si es Ud. estudiante universitario, ¿a qué universidad o college asiste?		01	<input type="checkbox"/> PSU	02	<input type="checkbox"/> PCC	03	<input type="checkbox"/> Otro _____	
16. ¿Es Ud.: (marque sólo uno)		01	<input type="checkbox"/> Asiático/De las Islas del Pacífico	03	<input type="checkbox"/> Caucásico/Blanco	05	<input type="checkbox"/> Multiracial/biracial	
	02	<input type="checkbox"/> Afroamericano/Negro	04	<input type="checkbox"/> Hispano/Latino	06	<input type="checkbox"/> Nativo Americano	07	<input type="checkbox"/> Otro _____
17. ¿Cuál fue el ingreso anual de su hogar antes del pago de impuestos para el año 2011? (marque un cuadro)								
01	<input type="checkbox"/> Menos de \$10,000	03	<input type="checkbox"/> \$20,000 a \$29,999	05	<input type="checkbox"/> \$40,000 a \$49,999	07	<input type="checkbox"/> \$60,000 a \$69,999	
02	<input type="checkbox"/> \$10,000 a \$19,999	04	<input type="checkbox"/> \$30,000 a \$39,999	06	<input type="checkbox"/> \$50,000 a \$59,999	08	<input type="checkbox"/> \$70,000 o más	
09	<input type="checkbox"/> No sé							
18. ¿Habla un idioma que no sea inglés?		03	<input type="checkbox"/> Sí	¿Qué idioma es ese? _____			04	<input type="checkbox"/> No
19. ¿Cuán bien habla el inglés?		05	<input type="checkbox"/> Muy bien	06	<input type="checkbox"/> Bien	07	<input type="checkbox"/> No bien	
		08	<input type="checkbox"/> No hablo inglés					

Entregue la tarjeta al encuestador o dóblela, péguela y envíela por correo. No necesita estampilla. Gracias por su atención.

Date: June 11, 2014

To: Board of Directors

From: Neil McFarlane *Neil McFarlane*

Subject: **ORDINANCE NO. 335 OF THE TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET) ADOPTING YOUTH FARE REDUCTIONS, AND AMENDING TRIMET CODE CHAPTER 19 (SECOND READING)**

1. Purpose of Item

Ordinance No. 335 amends TriMet Code Chapter 19 to adopt reductions to Youth fares. The fare changes would become operative on September 1, 2014, and are further described in Section 3, Background.

2. Type of Agenda Item

- Initial Contract
- Contract Modification
- Other: Ordinance

3. Reason for Board Action

The TriMet Code may be amended only by adoption of an ordinance. Adoption of Ordinance No. 335 requires two readings.

4. Type of Action:

- Resolution
- Ordinance 1st Reading
- Ordinance 2nd Reading
- Other

5. Background

TriMet reviews fares regularly to ensure fare levels are set appropriately for our customers, while keeping pace with the cost of operating the transit system. Fare adjustments, which regularly occur in September of each year, attempt to balance affordable fares with the need to generate revenues and serve a growing number of riders. The last change in fixed route fares occurred September 1, 2012. LIFT paratransit cash fares increased April 1, 2014.

Ordinance No. 335 proposes a reduction in Youth fares, in order to provide youth and their families across the region with enhanced opportunities to use transit. Currently, approximately 42% of youth in the TriMet District meet income eligibility thresholds that qualify them for Free and Reduced-Priced Meals programs.¹ Lowering Youth fares helps reduce barriers to using transit for all youth across the region, by making it more affordable

Eligibility is determined by household size and income (\$43,568 annually for a household of four). Children in households receiving Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance to Needy Families (TANF) or Food Distribution Program on Indian Reservations (FDPIR) are also eligible for free and reduced-priced meals. <http://www.ode.state.or.us>.

for youth to get to school and after-school activities, access employment opportunities, and fulfill family-related responsibilities. It also makes riding TriMet more affordable for parents traveling with children between ages 7 and 17 (children under 7 ride for free).

TriMet assesses transit equity considerations of proposed fare changes on low-income and minority populations. To do this, TriMet identifies potential *adverse effects* and analyzes whether there are *disparate impacts*, i.e., whether any of the impacts fall on minority populations more than on others, and whether there are *disproportionate burdens* on low-income riders. The proposed Youth fare changes have been assessed and those findings have been presented to the Board for their consideration in the document entitled "Fall 2014 Fare & Service Change Equity Analysis Report" dated May 27, 2014 ("Report"). In summary, the fare change equity analysis set forth in the Report provided to the Board for adoption of Ordinance No. 335 finds no *disparate impact* on minority youth and no *disproportionate burden* on low-income youth. Both minority and low-income youth generally stand to see the greatest fare reductions from the proposed Youth fare changes, based on the fares they purchase.

Youth Fare Reductions Public Comment and Outreach

Public comment on the Youth fare reductions is accepted by phone, email and standard mail. A summary of comments received via these venues will be provided to the Board prior to the June 11, 2014 Board meeting. In addition, verbal and written comments may be provided during Public Forum on June 11, 2014.

TriMet staff has also solicited feedback from the Transit Equity Advisory Committee (TEAC), the Multnomah Youth Commission, community-based organizations who serve youth, and school district representatives throughout the service district.

6. Financial/Budget Impact

Ordinance No. 335 proposes specific Youth fare changes as described below, and all other fare levels would remain unchanged. The changes as proposed are estimated to reduce fare revenue by approximately \$775,000 annually, \$634,000 of which will be offset by increased contributions to the Portland Public Schools (PPS) Student Pass Program by Pass Program sponsors PPS and the City of Portland.

- Youth Single Ticket /Cash Fares: Reduced \$.40, from \$1.65 to \$1.25;
- Youth 1-Day Passes: Reduced \$.80, from \$3.30 to \$2.50;
- Youth Tickets / Book of 10: Reduced \$4, from \$16.50 to \$12.50;
- Youth 7-Day Passes: Reduced \$.50, from \$8.00 to \$7.50;
- Youth 14-Day Passes: Reduced \$1, from \$15.50 to \$14.50;
- Youth Monthly / 30-Day Passes: Reduced \$2, from \$30.00 to \$28.00; and
- Youth Annual Passes: Reduced \$22, from \$330.00 to \$308.00.

7. Impact if Not Approved

Should the Board not proceed with a second reading and not adopt Ordinance No. 335, the existing Youth fare pricing structure of the TriMet Code would remain in place.

ORDINANCE NO. 335

AN ORDINANCE OF THE TRI-COUNTY METROPOLITAN
TRANSPORTATION DISTRICT OF OREGON (TRIMET) ADOPTING YOUTH
FARE REDUCTIONS AND AMENDING TRIMET CODE CHAPTER 19

THE BOARD OF DIRECTORS OF THE TRI-COUNTY METROPOLITAN
TRANSPORTATION DISTRICT OF OREGON (TRIMET), pursuant to the authority of Oregon
Revised Statutes Chapter 267, having considered the transit equity fare change analysis report,
does hereby ordain and decree the following Ordinance:

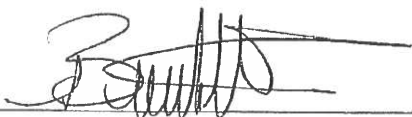
Section 1 – Adoption of Youth Fare Reductions; Amendment of TriMet Code Chapter 19

TriMet Code (TMC) Chapter 19 shall be amended as set forth on the attached Exhibit A, which
is incorporated into and made part of this Ordinance No. 335.

Section 2 – Effective/Operative Dates

This Ordinance shall take effect thirty days after the date of its adoption. Amendments to TMC
Section 19.15 Fares shall become operative on September 1, 2014.

Date Adopted: June 11, 2014

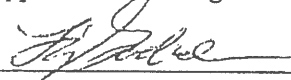


Presiding Officer

Attest:

Kelly Kuxion
Recording Secretary

Approved as to Legal Sufficiency:



Legal Department

**ORDINANCE NO. 335
EXHIBIT A**

TriMet Code (TMC) Chapter 19, Section 19.15 Fares, is amended as set forth below. Deletions are shown in brackets with a line through the text, and additions are shown in underlined, bold text. All amendments shall become operative September 1, 2014.

19.15 Fares.

A. Regular Transit Services:

The fares payable for use on the TriMet transit system shall vary according to the status of the rider and method of payment and shall be as follows:

(1) Monthly Passes and 30-Day Passes

(a) <u>Status</u>	<u>Fare</u>
YOUTH	\$ [30.00] <u>28.00</u>
HONORED CITIZEN	\$26.00
ADULT	\$100.00

- (b) A 30-Day Pass shall be valid for travel on any regularly scheduled TriMet route in accordance with the status of the rider for the period of thirty (30) consecutive days from the date of purchase.

(2) Pre-Paid Tickets

(a) <u>Status</u>	<u>Fare</u>
YOUTH	10/ 16.50 <u>12.50</u>
HONORED CITIZEN	10/\$10.00
ADULT	10/\$25.00

- (b) Pre-paid unvalidated tickets may be used in the amount of their cash value for payment of additional fare, i.e., two Adult tickets may be used for an Adult 1-Day Pass. Refunds for overpayment will not be given.

* * *

(3) Cash Fares

<u>Status</u>	<u>Fare</u>
YOUTH	\$ [1.65] <u>1.25</u>
HONORED CITIZEN	\$1.00
ADULT	\$2.50

(4) Annual Passes

<u>(a) Status</u>	<u>Fare</u>
YOUTH	[\$330.00] <u>308.00</u>
HONORED CITIZEN	\$286.00
ADULT	\$1,100.00
	* * *

(6) 1-Day Pass

A 1-Day Pass shall be valid for travel on any regularly scheduled TriMet route, in accordance with the status of the rider, for the remainder of the service day in which the 1-Day Pass is valid.

<u>Status</u>	<u>Fare</u>
YOUTH	[\$3.30] <u>2.50</u>
HONORED CITIZEN	\$2.00
ADULT	\$5.00

(7) 7-Day Pass

The 7-Day Pass shall be valid for travel on any regularly scheduled TriMet route in accordance with the status of the rider for the period of seven (7) consecutive days.

<u>Status</u>	<u>Fare</u>
YOUTH	[\$8.00] <u>7.50</u>
HONORED CITIZEN	\$7.00
ADULT	\$26.00

(8) 14-Day Pass

A 14-Day Pass shall be valid for travel on any regularly scheduled TriMet route in accordance with the status of the rider for the period of fourteen (14) consecutive days as follows:

<u>Status</u>	<u>Fare</u>
YOUTH	[\$15.50] <u>14.50</u>
HONORED CITIZEN	\$13.50
ADULT	\$51.00

* * *

Date: May 22, 2014

To: Board of Directors

From: Johnell Bell, Director of Diversity & Transit Equity

Subject: **EQUITY ANALYSIS OF FARE AND SERVICE CHANGES
RECOMMENDED FOR FALL 2014**

This memo summarizes the results of an analysis of potential equity impacts of fare and service changes proposed to take effect September 1, 2014. Fare changes include a reduction in Youth fares and an agreement to subsidize TriMet passes for Portland Public School (PPS) high school students from September 2014 to June 2015. Service changes include improving frequency, capacity, and reliability on several bus and MAX light rail lines.

Under Federal Transit Administration (FTA) Title VI regulations as well as TriMet’s policies and definitions, any increase or decrease to fares requires an equity analysis to be conducted and the Board advised of the results prior to final action on recommended changes. The same is true for what is defined under TriMet’s Title VI Program as “major service changes.”

Background

Fare changes – defined in FTA regulations as an increase or decrease in fare price lasting longer than six months – require a Title VI equity analysis. Because both the Youth fare reduction and TriMet’s PPS Student Pass program contribution will last longer than six months, staff has conducted this analysis for the Board’s review.

Regarding proposed service improvements, TriMet considers 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. None of the proposed changes meet said qualifications, and thus do not require a Title VI equity analysis.

Analysis

The analysis of proposed fare changes compares potential impacts on minority and non-minority populations, as well as low-income and higher income populations. Because the proposal is to reduce all youth fares, and to continue to provide TriMet passes to PPS high school students, there is no potential adverse effect on youth fare and PPS high school pass users. Thus the focus for the analysis is on the potential benefits rather than adverse effects.

Findings

In brief, the review finds no potential disparate impacts (minority populations) nor disproportionate burdens (low-income populations) associated with the fare proposals. With the Youth fare reduction, minority and low-income youth stand to see a proportionally equal-or-greater benefit than non-minority and higher-income youth due to their fare purchase patterns and the degree various fares are proposed to decrease. And, while data shows that the PPS Student Pass program may disproportionately benefit non-

minority and higher-income youth, PPS is also the only district in the TriMet service district without yellow bus service for high school students. TriMet also will be exploring the possibility of establishing similar partnerships with other school districts in the region.

Public Engagement

TriMet's Public Engagement and Outreach Framework, adopted as part of the agency's Title VI Program, states that TriMet will use "...a variety of methods to communicate proposed changes and solicit feedback from the community." Staff has already begun engaging key stakeholders, including the Transit Equity Advisory Committee (TEAC), the Multnomah Youth Commission, high school principals throughout the region, and will soon include school district superintendents as well as youth-serving community-based organizations. Feedback received will be provided to the Board prior to final action on the proposed changes.

No one signed up to speak on Resolution 14-06-34.

Action: After general discussion, Craig Prosser moved approval of Resolution 14-06-34; T. Allen Bethel seconded the motion. The motion was unanimously approved.

4. Ordinance 335 Adopting Youth Fare Changes, and Amending TriMet Code Chapter 19 (Second Reading)

Shelley Devine read Ordinance 335 by title only -- Neil McFarlane briefed the Board on the action that is proposed in Ordinance 335.

The following people spoke to Ordinance 335 during public forum:

Lupita Velazquez, OPAL and Bus Riders Unite, spoke on Ordinance 335. Ms. Velazquez asked about the decision-making process regarding the reduction of the youth pass and stated that she felt that the final decision did not consider meaningful input from youth and specifically the recommendation that came from the May 17th Youth Summit on Transit Justice to reduce the youth all-day pass from \$3.30 to \$2.00, not the \$2.50 being proposed; and the youth monthly pass from \$30.00 to \$15.00, not \$28.00. Ms. Velazquez asked the Board to include youth in their decision-making moving forward and to have a member of the Multnomah Youth Commission on TriMet's Transit Equity Committee.

Christopher Luchini, Multnomah Youth Commissioner on the Sustainability Committee, spoke in favor of Ordinance 335, and asked the Board to consider further reduction of youth fares as recommended by the Youth Commission and to expand the youth pass program to other schools in the region. Mr. Luchini shared examples of how the reduction in youth fares and the student pass program would benefit students and the community.

Board member Stovall asked about the recommendation from the Transit Equity Committee (TEAC) regarding Ordinance 335.

Neil McFarlane indicated that TEAC Chair Catherine Ciarlo submitted a letter dated May 22, 2014, on behalf of TEAC, supporting the reduction of youth fares and the continuation of the PPS Student Pass Program. Heidi Guenin, Upstream Public Health and member of TEAC, submitted a letter in support of Ordinance 335, but asked the Board to consider the policy recommendations presented at the May 17th Youth Summit on Transit Justice in future decisions. Ms. Guenin expressed concern that TEAC was asked for their support prior to the Youth Summit and after the proposal and analysis was presented to the Board.

TriMet Board of Directors Meeting
June 11, 2014

Board member Stovall stated that there is broad representation from the community, including a representative from OPAL, on the Transit Equity Committee.

Mr. McFarlane stated that staff has offered a seat on TEAC to the Multnomah Youth Commission as well.

President Warner stated that the Board has received the recommendations from the Multnomah Youth Commission and appreciates their input and advice. President Warner stated that he is comfortable with the reduction proposed in Ordinance 335 and will vote in favor.

T. Allen Bethel stated that he is also comfortable with the nearly 25% reduction in the youth fares.

Board member Stovall stated that he feels encouraged that we are moving in the right direction and this decision is part of the Board's commitment to fare equity.

Action: Travis Stovall moved approval of Ordinance 335; Joe Esmonde seconded the motion. A roll call vote was required, and resulted in the following approval.

Craig Prosser.....	Yes
Travis Stovall	Yes
Bruce Warner.....	Yes
T. Allen Bethel.....	Yes
Joe Esmonde.....	Yes

5. Other Business & Adjournment

There was no other business to come before the Board -- President Warner adjourned the meeting at 11:10 a.m.

Respectfully submitted,



Kelly Runnion, Recording Secretary

Attachment I

ORDINANCE 332 TRANSFER POLICY CHANGE FARE EQUITY ANALYSIS, WITH DOCUMENTATION OF BOARD APPROVAL



Ordinance No. 332 Transfer Policy Change

Fare Equity Analysis

FINAL

Department of Diversity and Transit Equity

December 9, 2014

I. Background

In response to a community-based effort asking TriMet to increase the length of time riders are allowed to transfer on a single fare, the agency is considering extending the transfer time from two hours to 2 ½ hours. At present riders purchasing a single fare using cash or a prepaid ticket are issued a ticket good for boarding any bus, MAX light rail, or WES commuter rail within two hours from the time shown on that ticket. With the proposed change in the transfer policy the ticket issued to those riders would be good for 2 ½ hours from the time shown on that ticket.

Recent guidance from the Federal Transit Administration (FTA) states that a transfer policy change is considered to be a fare change [Appendix A: FTA letter to TriMet dated July 17, 2014]. As a recipient of Federal financial assistance, TriMet must ensure that any fare change complies with Title VI of the Civil Rights Act of 1964, which states:

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

The FTA has provided specific implementing guidelines and regulations for complying with Title VI in Circular 4702.1B (“Circular”). Due to the interrelated nature of race/ethnicity and income, the Circular instructs transit agencies to consider impacts on low-income populations as well as minority populations; the assessment of potential Title VI issues related to fare changes is completed through a fare equity analysis. Figure 1 below shows the sequence of steps and considerations in the equity analysis process.

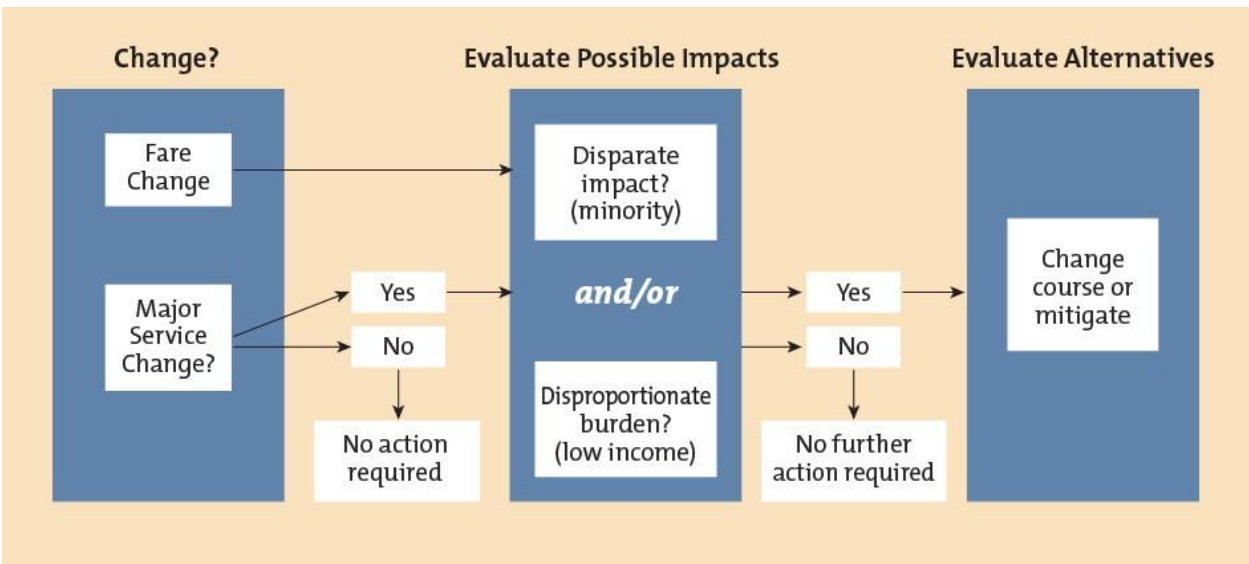


Figure 1: Overview of Process for Title VI Equity Analysis

II. TriMet Title VI Compliance

In the fall of 2013, TriMet updated its Title VI Program, which received concurrence by the FTA in January 2014. The program outlines agency policies, definitions and procedures for complying with Title VI and performing equity analyses. This includes the agency's fare change, disparate impact, and disproportionate burden policies.

A. Fare Change Policy

Any proposed fare change – whether in price or fare media – is subject to a fare equity analysis. Recently received guidance from FTA clarifies that this includes proposed changes to transfer policy:

Due to the nexus a transfer policy has with accessing a transit system, FTA views a change to a transfer policy the same as a change to any fare medium. As a result, a transfer policy change requires a fare equity analysis to determine whether a proposed change will result in a disparate impact and/or disproportionate burden. [Appendix A: FTA letter to TriMet dated July 17, 2014]

B. Disparate Impact Policy

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

The FTA's guidance that transfer policy changes fall under the “fare change” definition came after the agency's 2013 Title VI Program had received concurrence. Because of this, TriMet's adopted disparate impact policy for fare changes does not prescribe a process for analysis of transfer time changes. Rather, the policy states:

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. [Appendix B: TriMet 2013 Title VI Program, pg. 28]

Using the available data, TriMet staff assessed the potential impact of the proposed change in transfer policy using methods and analyses consistent with equity evaluations of changes in fare pricing. The agency's most recent fare survey (conducted in fall 2012 and attached as Appendix C) is informative about fare payment patterns, transfer activity, and how those compare between trips taken by minority and non-minority riders.

Given the proposal to increase the transfer window from two hours to 2 ½ hours, this analysis evaluates the differences between minority and non-minority trips in terms of single fare (cash or ticket) usage – since

transfer times are relevant only for those purchasing single fares – as well as utilization of transfers and round trip patterns. An underlying assumption is that the greater the number of transfers in a trip the longer it will take to complete, and thus more likely that the person taking the trip would benefit from the extra thirty minutes to make his or her final boarding. In this context, there may be potential for a disparate impact if minority riders use single fares at significantly lower rates than non-minority riders, and/or if impacted minority riders transfer less often than impacted non-minority riders. This is because in either case minority riders would be less likely to benefit from the policy change.

C. Disproportionate Burden Policy

Testing for “disproportionate burden” evaluates potential effects on low-income populations, defined as at or below 150% of the federal poverty level. The analysis methods undertaken here are the same as those used to determine potential disparate impacts, but by comparing low-income and higher income populations rather than minority and non-minority populations.

III. TriMet Ordinance 332

A. Description of Change

Currently, TriMet riders who purchase single fares with cash or a prepaid ticket receive two hours after the time of boarding or ticket validation to transfer to another route. These riders, who comprise 27% of weekday trips and 37% of weekend trips on TriMet, would receive thirty more minutes to transfer under Ordinance No. 332, bringing the total time allowed to complete their final boarding to 2 ½ hours. The policy change would not affect the price of fares and would apply regardless of single fare type paid (whether Adult, Honored Citizen, or Youth). Riders using other fare types (1-Day, 7-Day, 14-Day, 30- Day/Monthly passes) would be unaffected by the change.

The 2012 TriMet on-board fare survey collected fare payment and demographic data that can be used to conduct a fare equity analysis as described in sections II-B and II-C of this document.

B. Disparate Impact Analysis

Single cash/ticket fare usage

The first level of the disparate impact analysis examines the minority status of single cash/ticket fare payers because single fare payers are the only riders potentially impacted by the transfer policy change. The pie charts on the next page compare the minority/non-minority split for single fares and all fares on weekdays (Figure 2) and weekends (Figure 3).

If the minority status of single fare payers were in proportion to minority status of overall ridership, percentages would be similar for the pairs of charts. As shown, minority riders comprise about 29% of single fare payers and 27% of all fare payers on weekdays. This is not a “statistically significant” difference, which is the policy standard set forth in the agency’s disparate impact policy. This means that weekday minority riders

appear to use single fares in proportion to the amount that they ride TriMet. Analysis of weekend fares had similar results, with minority riders comprising 31% of both system trips and single cash/ticket fare trips.

Figure 2: Minority and non-minority riders use single fares in proportion to their ridership on weekdays.

TriMet 2012 Fare Survey

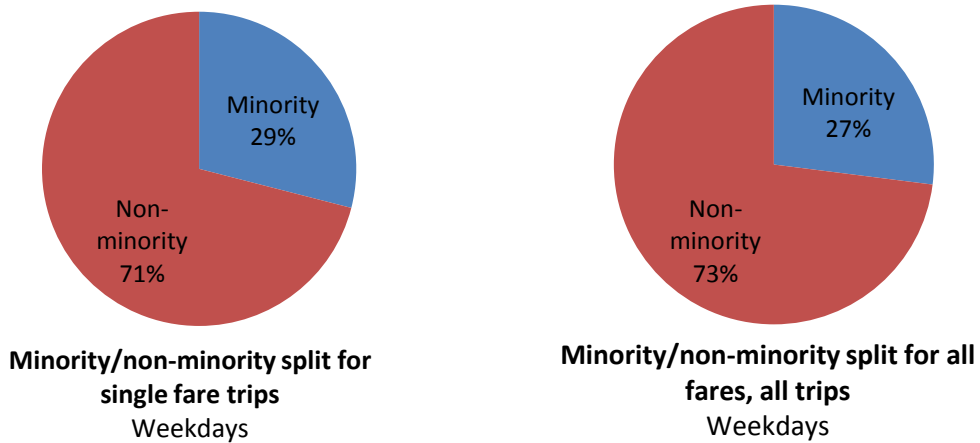
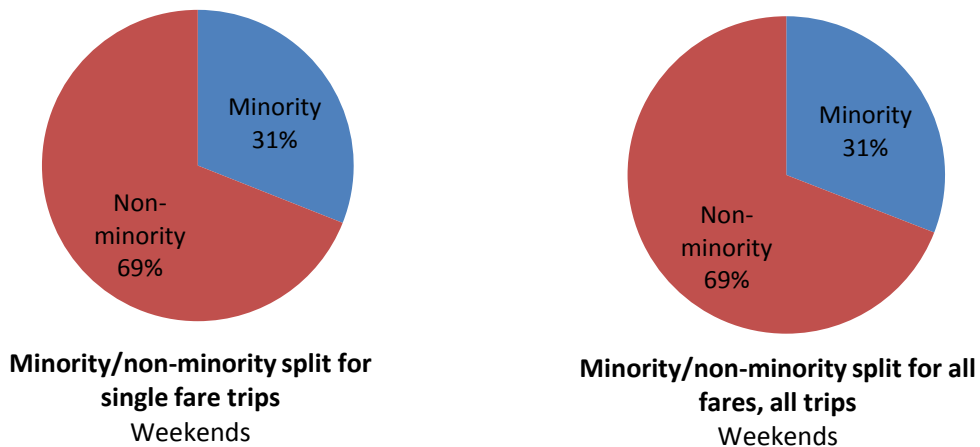


Figure 3: Minority and non-minority riders use single fares in proportion to their ridership on weekends.

TriMet 2012 Fare Survey



Transfer activity

Table 1 (pg. 6) and Figures 4 and 5 (pgs. 6-7) show the distribution of trips for minority and non-minority riders in terms of number of transfers made for both weekday and weekend trips¹. For both groups, about

¹ The data does not indicate length of trips. Therefore, the analysis requires an inference that the more transfers involved, the longer the trip.

26-30% of trips include one or more transfers, whether on weekdays or weekends. None of the differences between groups were statistically significant; the differences in percentages are most likely due to chance, and do not signify an actual difference in trip patterns.

Recognizing the overall assumption that a greater number of transfers generally means a longer time to complete a trip, the similar patterns of transfer usage between minority and non-minority riders indicates that each population is as likely as the other to benefit from extending the transfer time window.

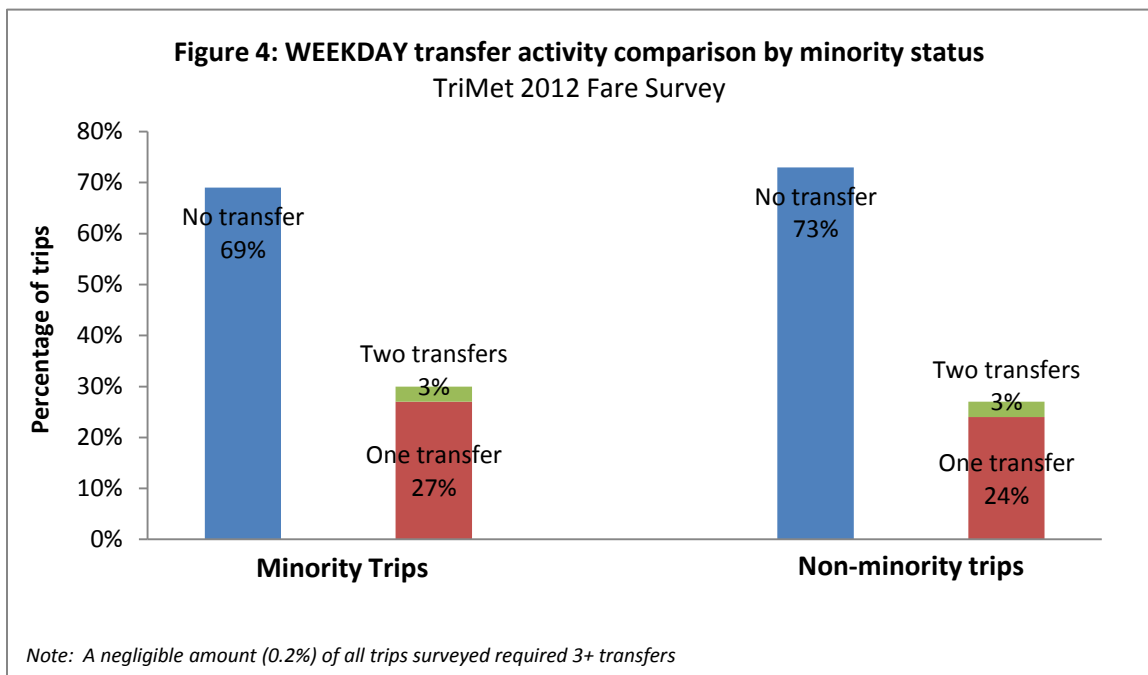
Table 1: Transfer activity by minority/non-minority status
TriMet 2012 Fare Survey¹

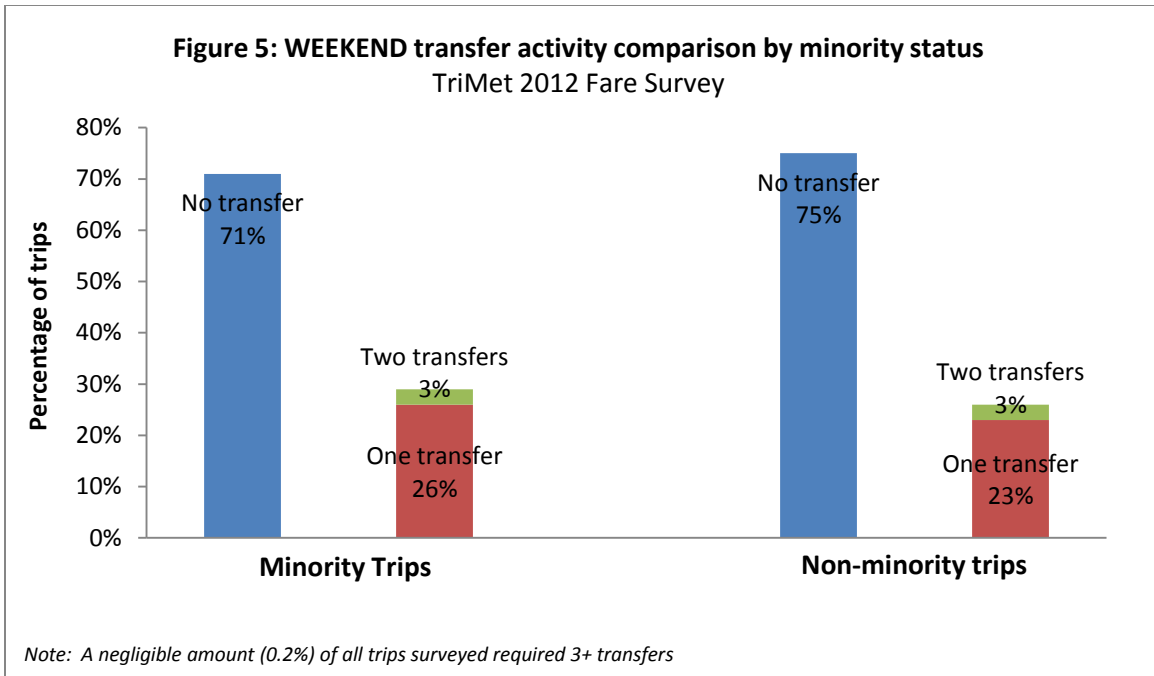
Number of transfers	Weekday Trips		Weekend Trips	
	Non-minority n=899	Minority n=373	Non-minority n=844	Minority n=378
One transfer	24%	27%	23%	26%
Two transfers	3%	3%	3%	3%
<u>Three or more transfers</u>	<u>0%</u>	<u>0%</u>	<u>0%</u>	<u>0%</u>
Subtotal – trips with transfer	27%	30%	26%	29%
<u>No transfer</u>	<u>73%</u>	<u>69%</u>	<u>75%</u>	<u>71%</u>
Total ²	100%	100%	100%	100%

¹Table includes only single fare cash/ticket payers because only single fares would be impacted by the change

²Percentages that do not add up to 100% are due to rounding

No statistically significant differences found (at the 95% confidence level) between minority and non-minority trips.





Round trips on single fares

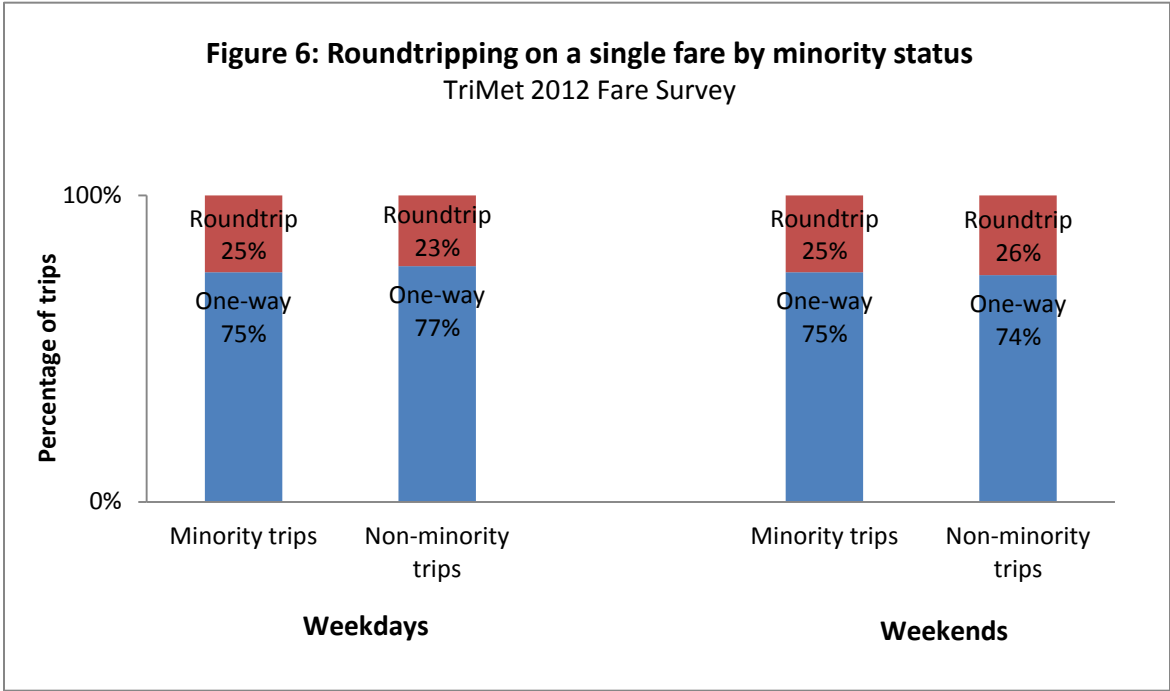
An additional consideration in terms of the equity of increased transfer time is riders’ ability to make a round trip on a single fare; those advocating for increased transfer time have commonly stated that this policy change could benefit transit dependent riders, particularly minority and low-income riders, in this way. While the intent of TriMet’s transfer policy is to allow for sufficient time to make a one-way trip within the service district, the agency does not prohibit round-tripping on a single fare, so long as the rider’s final boarding occurs before the expiration time on his or her transfer ticket.

Table 2 below and Figure 6 (pg. 8) compare how minority and non-minority riders answered the following question on the 2012 TriMet Fare Survey: “Is your single fare payment being used for a one-way or a round-trip?” About one-quarter of single cash/ticket fares paid were reportedly used to make a round-trip. This figure is similar between populations as well as between weekday and weekend trips. In other words, when looking at trips made by minority and non-minority riders, the survey results do not signify an actual difference in terms of how often single fares are used to make a round-trip; both groups seem equally likely to realize this benefit.

**Table 2: Is your single fare payment being used for a one-way or a round-trip?
Minority and non-minority comparison**

TriMet 2012 Fare Survey

One-way or Round-trip	Weekday Trips		Weekend Trips	
	Non-minority n=898	Minority n=372	Non-minority n=845	Minority n=379
One-way	77%	75%	74%	75%
Round-trip	23%	25%	26%	25%
Total	100%	100%	100%	100%



Thus, in the context of this change in transfer policy, the available data and the analysis find no potential disparate impact on minority riders.

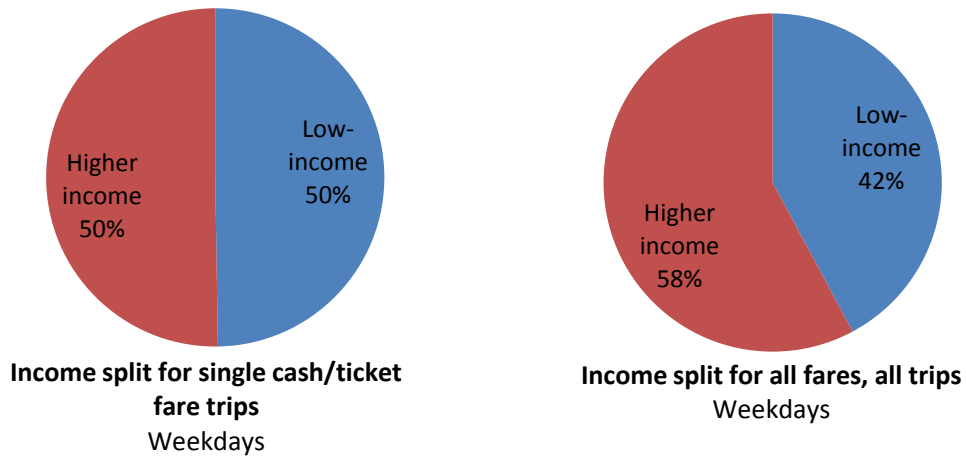
C. Disproportionate Burden Analysis

Single cash/ticket fare usage

The first level of the disproportionate burden analysis examines the income status of single cash/ticket fare payers. The pie charts on the next page compare the low-income/higher income split for single fares and all fares on weekdays (Figure 7) and weekends (Figure 8).

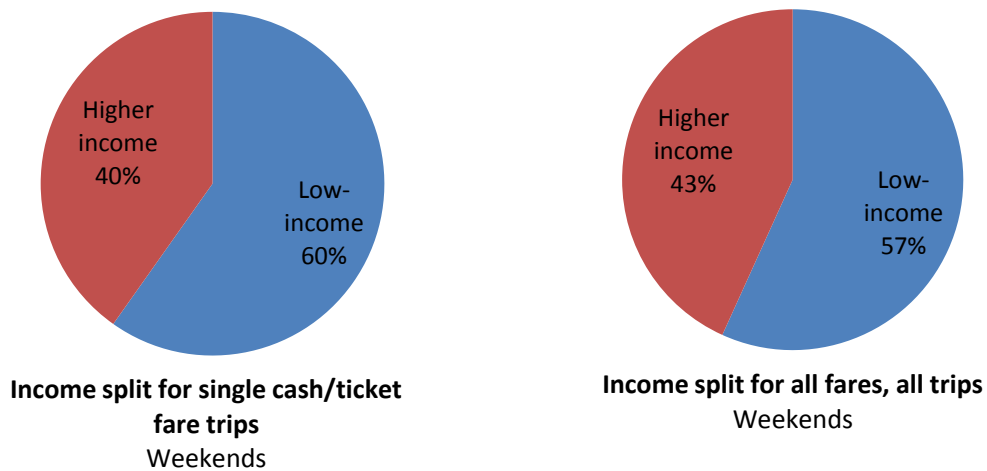
If the income status of single fare payers were in proportion to income status of overall ridership, percentages would be similar for the pairs of charts. As shown, low-income riders comprise about 50% of single fare payers and 42% of all fare payers/trips on weekdays. This is a statistically significant difference, meaning that weekday low-income riders use single fares more commonly than expected given their ridership, and are therefore more likely to be impacted (positively) by the proposed policy change. This was not the case for weekends, however, as no statistically significant difference was found between the 60% of single fares that are paid by low-income riders and the 57% of fares overall paid by low-income riders.

Figure 7: Low-income riders are over-represented amongst single fare payers on weekdays.
TriMet 2012 Fare Survey



Note: Low-income defined as at or below 150% federal poverty level

Figure 8: Low and higher income riders use single fares in proportion to their ridership on weekends.
TriMet 2012 Fare Survey



Note: Low-income defined as at or below 150% federal poverty level

Transfer activity

Table 3 (pg. 10) and Figures 9 and 10 (pgs. 10-11) show the distribution of trips for low-income and higher income riders in terms of number of transfers made for both weekday and weekend trips. Low-income trips are more likely to include a transfer than trips made by higher income riders, and this is true on both

weekdays and weekends. On weekdays about one-quarter of trips made by higher income riders include at least one transfer, whereas one-third of low-income weekday trips do. Differences are slightly lower for weekends, but in both cases the differences meet the standard of statistical significance. Recognizing the overall assumption that a greater number of transfers generally means a longer time to complete a trip, low-income riders appear more likely to benefit from the transfer time increase because their trips more often include at least one transfer than trips made by higher income riders.

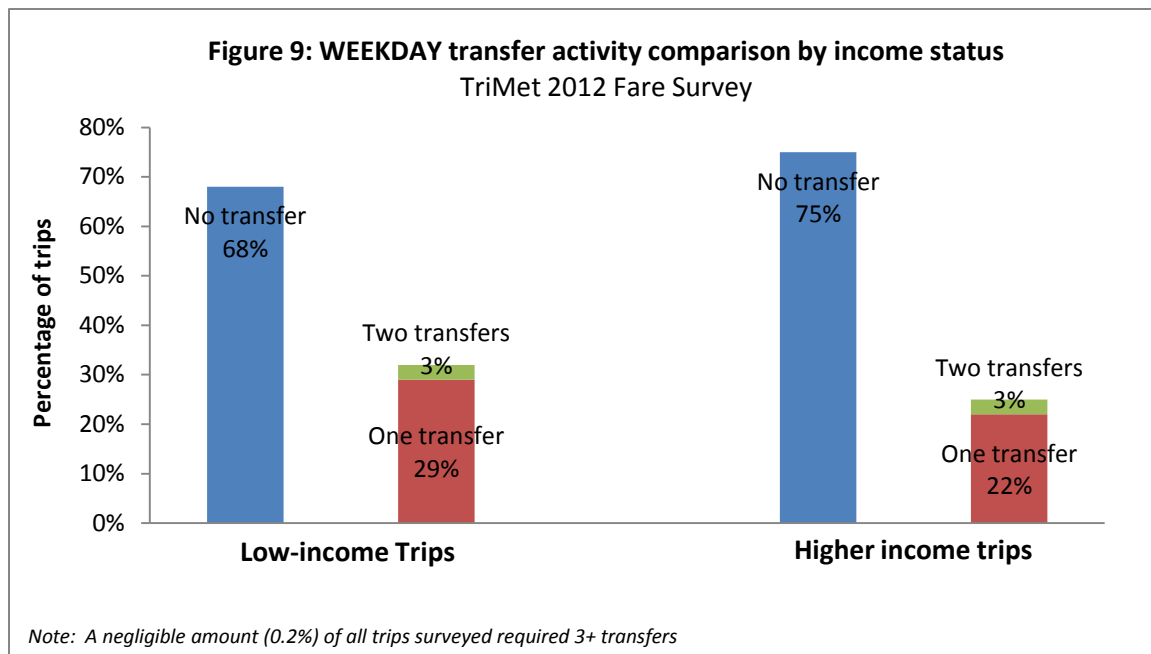
Table 3: Transfer activity by income status
2012 TriMet Fare Survey¹

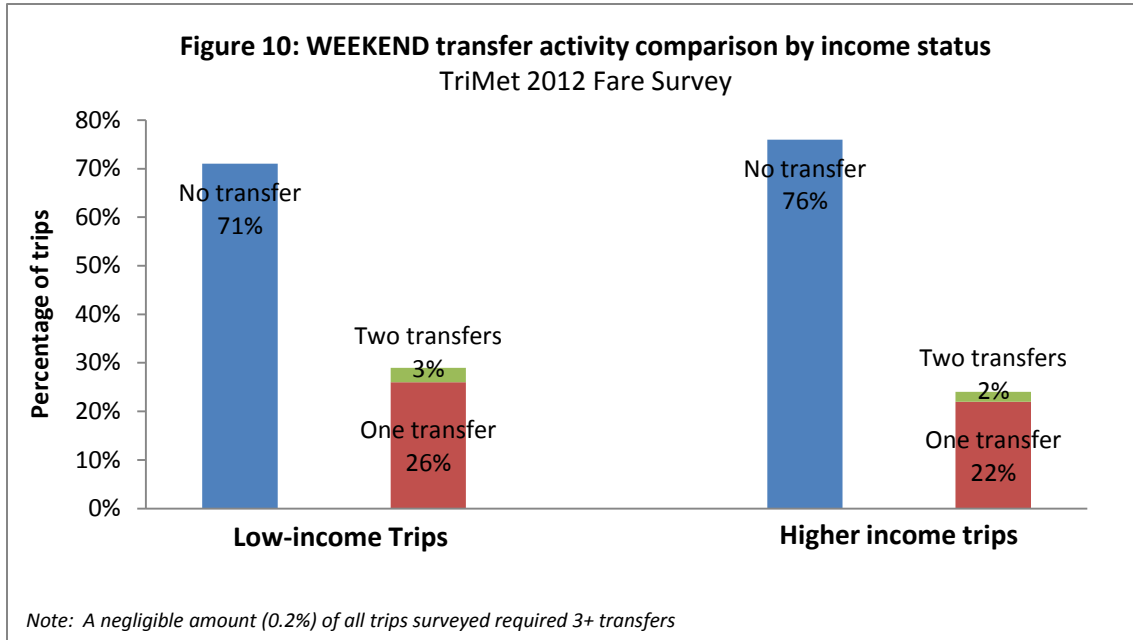
Number of transfers	Weekday Trips		Weekend Trips	
	Higher income n=547	Low-income n=535	Higher income n=425	Low-income n=624
One transfer	22%	29%	22%	26%
Two transfers	3%	3%	2%	3%
<u>Three or more transfers</u>	<u>0%</u>	<u>0%</u>	<u>0%</u>	<u>0%</u>
Subtotal – pct. trips with transfer	25%	32%	24%	29%
<u>No transfer</u>	75%	67%	76%	71%
Total ²	100%	100%	100%	100%

¹Table includes only single fare cash/ticket payers because only single fares would be impacted by the change. Low-income defined as at or below 150% federal poverty level.

²Percentages that do not add up to 100% are due to rounding

Bold indicates a statistically significant difference (at the 95% confidence level) between higher income and low-income trips.





Round trips on single fares

As with the analysis of impact on minority riders, an additional equity consideration is riders’ ability to make a round trip on a single fare; those advocating for increased transfer time have commonly stated that this policy change could benefit transit dependent riders, particularly minority and low-income riders, in this way. While the intent of TriMet’s transfer policy is to allow for sufficient time to make a one-way within the District, the agency does not prohibit round-tripping on a single fare, so long as the rider’s final boarding occurs before the expiration time on his or her transfer ticket.

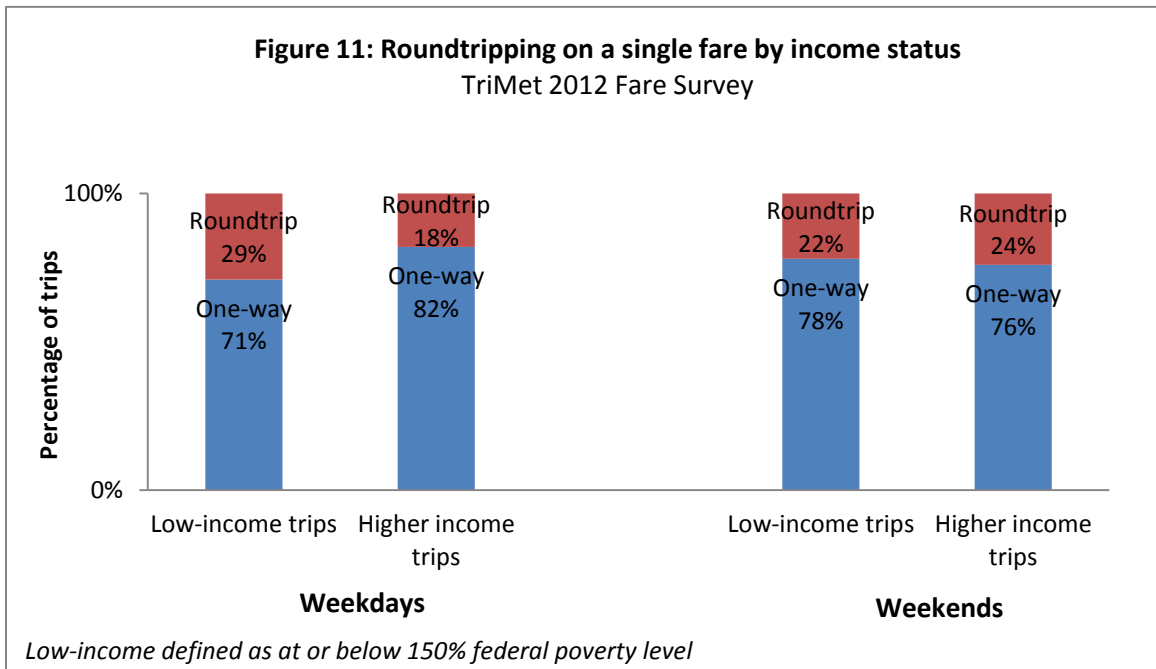
Table 4 and Figure 11 (pg. 12) compare how low-income and higher income riders answered the following question on the 2012 TriMet Fare Survey: “Is your single fare payment being used for a one-way or a round-trip?” On weekdays, low-income riders are more likely than higher income riders to use single fares to make a round-trip on TriMet. On the other hand, no statistically significant difference exists between low and higher income trips on the weekends – both groups use single fares for round-trips about one-quarter of the time on the weekends.

Table 4: Is your single fare payment being used for a one-way or a round-trip?
Low-income¹ and higher income comparison
TriMet 2012 Fare Survey

One-way or Round Trip	Weekday Trips		Weekend Trips	
	Higher income	Low-income	Higher income	Low-income
One-way	82%	71%	76%	78%
Round-trip	18%	29%	24%	22%
Total	100%	100%	100%	100%

¹Low-income defined as at or below 150% federal poverty level

Bold = statistically significant difference (at a 95% confidence level) between higher income and low-income



Thus, in the context of this change in transfer policy, the available data and the analysis find no potential disproportionate burden on low-income riders.

IV. Fare Equity Analysis Conclusions

This analysis has aimed to ensure that minority and low-income TriMet riders would not be limited or denied the benefits of an increase in transfer time from two hours to 2 ½ hours. The analysis concludes:

- **No potential disparate impact** on minority riders associated with increasing the transfer time window. Minority and non-minority riders are equally likely to benefit from the policy change because both groups:
 - Use single cash/ticket fares in proportion to their ridership;
 - Have similar transfer activity, and;
 - Utilize single fares to make round trips at similar rates.

- **No potential disproportionate burden** on low-income riders associated with increasing the transfer time window. Low-income riders are more likely to benefit from the policy change in comparison to higher income riders because low-income trips:
 - Comprise a higher-than-expected proportion of single cash/ticket fares;
 - Are more likely to include a transfer, and;
 - Are equally or more likely to involve using a single fare for a round trip.

APPENDIX A: FTA letter to TriMet dated July 17, 2014



**U.S. Department
of Transportation
Federal Transit
Administration**

Headquarters

5th Floor- East Bldg., TCR
1200 New Jersey Avenue, SE
Washington, DC 20590

July 17, 2014

NeilS. McFarlane
General Manager
TriMet
1800 SW 1st Avenue, Suite 300
Portland, OR 97201

Re: FTA Complaint No. 2014-0048

Dear Mr. McFarlane:

This letter responds to the complaint filed against Tri-County Metropolitan Transportation District of Oregon (TriMet) by Organizing People and Activating Leaders (OPAL) and the Center for Intercultural Organizing (ICO). The Federal Transit Administration (FTA) Office of Civil Rights is responsible for ensuring that providers of public transportation are in compliance with Title VI of the Civil Rights Act of 1964, as implemented by the U.S. Department of Transportation (DOT) at 49 CFR Part 21; FTA Circular 4702.1B, "Title VI Requirements and Guidelines for Federal Transit Administration Recipients"; and Executive Order 13166, "Improving Access to Services to Persons with Limited English Proficiency (LEP)."

In the FTA complaint investigation process, we analyze allegations for possible Title VI deficiencies by the transit provider. If deficiencies are identified, they are presented to the transit provider to correct them within a predetermined timeframe. If FTA cannot resolve the apparent violations of Title VI or the DOT Title VI regulations by voluntary means, formal enforcement proceedings may be initiated against the public transportation provider, which may result in the suspension or termination of Federal funds. FTA also may refer the matter to the U.S. Department of Justice for enforcement.

Allegations

The complaint alleges that TriMet failed to comply with FTA's Title VI Circular, when TriMet implemented a change to its transfer policy and did not conduct a fare equity analysis. The complainants believe that TriMet's transfer policy not only failed to comply with FTA's Title VI Circular, but the transfer change also resulted in a disparate impact.

Facts

According to the information provided by the complainants and TriMet, a transfer change occurred on June 13, 2012. Prior to implementing the transfer change policy, TriMet sought technical assistance from FTA on a proposed fare change and major service change. In this request, TriMet mentioned to FTA that it was also going to standardize its transfer policy. Consequently, TriMet adopted a standardized two hour transfer policy for all modes of transit service and days of the week. TriMet worked with the complainants to determine whether the two hour transfer window could be extended to three hours, and as of December 11, 2013, there was a proposal to extend the transfer policy to two and a half hours.

Nevertheless, the complainants filed a Title VI complaint regarding the transfer policy on December 27, 2013 with FTA.

Analysis

For purposes of corrective actions, the relevant FTA Title VI Circular is Circular 4702.1B, which became effective on October 1, 2012. In making a determination, FTA recognizes that TriMet is currently considering new changes to the transfer policy at the center of this complaint.

Timeliness

In TriMet's response, the issue of timeliness was raised. Per DOT Title VI Regulations, "[a]ny person who believes himself or any specific class of persons to be subjected to discrimination prohibited by this part may . . . file with the Secretary a written complaint. A complaint must be filed not later than 180 days after the date of the alleged discrimination." (49 CFR § 21.11(b)) Upon review of the complainants' and TriMet's material, FTA does agree that the complaint was raised outside of the 180 days afforded to the complainants. Nonetheless, FTA initiated its investigation into the transfer policy matter under its investigation authority provided in 49 CFR § 21.11(c), due to the allegations. Unlike an individual who has 180 days from the alleged incident to file a Title VI complaint, FTA does not have the same time constraint. As FTA conducted the investigation under its own authority, any barrier as to the complainants' timeliness is moot.

Transfer Policy

At the time of the transfer policy change, FTA required grantees to comply with FTA Circular 4702.1A, which required grantees to "evaluate significant system-wide service and fare changes and proposed improvements at the planning and programming stages to determine whether those changes have a discriminatory impact." (Circular 4702.1A, Ch. V, sec. 4). Essentially, Circular 4702.1A recommended options a grantee should utilize to ensure fare changes did not have a discriminatory impact. (id.)

However, the revised Title VI Circular, FTA Circular 4702.1B, requires a specified approach to fare equity analyses. Yet, Circular 4702.1B did not become effective until October 1, 2012, well after the June 13, 2012 transfer policy change date. Given the timing of the events, TriMet did not have any formalized requirement to analyze the effects of the transfer policy. Furthermore, the TriMet material indicates that though never formally analyzing the possible effects of a transfer policy, public participation occurred during the process to modify the transfer policy. TriMet attempted to work with the complainants to expand the Transfer policy, and TriMet has a history of proactively seeking Title VI technical assistance.

TriMet indicated a proposed Ordinance will alter the transfer policy, but the ordinance is postponed until FTA determines whether a fare equity analysis is required for a transfer policy change. TriMet expressed a willingness to conduct a fare equity analysis, if FTA determines a transfer policy requires a fare equity analysis. FTA Circular 4702.1B does not explicitly state that a transfer policy is considered a fare medium. Nevertheless, as the Title VI Circular states "compliance with this Circular does not relieve a recipient from the requirements and responsibilities of the DOT Title VI regulation at 49 CFR part 21." (Circular 4702.1B, Ch. II, sec. 2).

DOT Title VI regulation states in part, "[a] recipient, in determining the types of services, financial aid, or other benefits . . . may not, through contractual or other arrangements, utilize criteria or methods of administration which have the effect of subjecting persons to discrimination because of their race, color, or national origin, or have the effect of defeating or substantially impairing accomplishment of the

objectives of the program with respect to individuals of a particular race, or national origin." (49 CFR Section 21.5(b)(2)). A transfer fare policy can be viewed as a benefit/financial aid imparted on riders, which has financial reverberations on the rider, as well as the transit agency. A transfer policy directly affects a rider's ability to access a transit system. The transfer policy relates to the amount a rider will spend on a ride and may affect his/her choice in which fare medium to purchase. Due to the nexus a transfer policy has with accessing a transit system, FTA views a change to a transfer policy the same as a change to any fare medium. As a result, a transfer policy change requires a fare equity analysis to determine whether a proposed change will result in a disparate impact and/or disproportionate burden.


FTA recommends that TriMet seek technical assistance for any proposed transfer policy change. Please note that technical assistance is available as long as the transfer policy has not received final board approval, or the equivalent. Additionally, any fare equity analysis requires ridership data. This data is necessary to conduct a compliant fare equity analysis. It is imperative that TriMet identify whether it must update its ridership data to better understand its transfer usage. Fare data is normally collected via surveys, and there may be a need to amend any current surveys to capture the transfer usage data.

Conclusion

FTA does not find TriMet noncompliant with FTA's Title requirements for the 2012 transfer policy change. We are therefore requiring no corrective action and are closing the complaint as of the date of this letter. Nevertheless, continued Title VI compliance will require TriMet to conduct a fare equity analysis for any future changes to the transfer policy. FTA is able to assist TriMet, if it desires to seek technical assistance.

If you have any questions, please contact Jonathan Ocana at (202) 493-0314 or via e-mail at jonathan.ocana@dot.gov. Please include the FTA complaint number in any correspondence regarding this complaint.

Sincerely,

 for

Dawn Sweet
Acting Title VI Team Leader
Office of Civil Rights

cc: TriMet
FTA Region 10

APPENDIX B: TriMet 2013 Title VI Program, pg. 28

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.

For lines with major service changes, if the percentage of minority population in tracts served by the impacted portion of the line (sum of minority population in all impacted tracts divided by the total population in all impacted tracts) exceeds the percentage of minority population in the TriMet District as a whole, the impacts of changes to the line will be considered disparate.

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 (sum of minority population in all impacted tracts divided by the minority population of the TriMet District as a whole) is compared to the percentage of impacted non-minority population (sum of non-minority population in all impacted tracts divided by the non-minority population of the TriMet District as a whole). Comparisons of impacts between minority and non-minority 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

APPENDIX C: 2012 TriMet Fare Survey

TriMet Rider Survey

Please fill out this form even if you have already received one on another bus or train.

Dear Rider: TriMet would like to know about the trip you are currently making. Please answer the following questions and return to the surveyor or drop it in the mail.

1. What line are you riding on now? Line # _____ Line name _____							
2. Do you have to transfer to or from a different line to make this trip in one direction?							
01 <input type="checkbox"/> No		<input type="checkbox"/> Yes. If Yes, how many times?		02 <input type="checkbox"/> 1 time		03 <input type="checkbox"/> 2 times	04 <input type="checkbox"/> 3 or more times
3. If you must transfer to make this trip, what lines do you transfer to or from? (not including the bus or train you are on now)							
Line # _____		Line name _____		Line # _____		Line name _____	
<input type="checkbox"/> MAX		<input type="checkbox"/> WES		<input type="checkbox"/> Portland Streetcar		<input type="checkbox"/> C-TRAN route # _____	<input type="checkbox"/> SAM Transit _____
4. How did you pay your fare for this trip? (check one) 01 <input type="checkbox"/> TriMet fare							
If Streetcar, which type of fare?		01 <input type="checkbox"/> 2-Hour Ticket (\$1)		02 <input type="checkbox"/> Portland Streetcar Annual Pass (\$150)		02 <input type="checkbox"/> C-TRAN fare	03 <input type="checkbox"/> Portland Streetcar fare
5. Which TriMet fare? (Please check one)							
01 <input type="checkbox"/> CASH (2-Hr Ticket)		02 <input type="checkbox"/> TICKET (Book of 10)		03 <input type="checkbox"/> 1-DAY PASS		04 <input type="checkbox"/> 7-DAY PASS	05 <input type="checkbox"/> 14-DAY PASS
06 <input type="checkbox"/> MONTHLY/30-Day PASS		07 <input type="checkbox"/> ANNUAL PASS					
Adult		01 <input type="checkbox"/> \$2.50	01 <input type="checkbox"/> \$25.00	01 <input type="checkbox"/> \$5.00	01 <input type="checkbox"/> \$26.00	01 <input type="checkbox"/> \$51.00	01 <input type="checkbox"/> \$100.00
Youth/Student		02 <input type="checkbox"/> \$1.65	02 <input type="checkbox"/> \$16.50	02 <input type="checkbox"/> \$3.30	02 <input type="checkbox"/> \$ 8.00	02 <input type="checkbox"/> \$15.50	02 <input type="checkbox"/> \$ 30.00
Honored Citizen/STAR		03 <input type="checkbox"/> \$1.00	03 <input type="checkbox"/> \$10.00	03 <input type="checkbox"/> \$2.00	03 <input type="checkbox"/> \$ 7.00	03 <input type="checkbox"/> \$13.50	03 <input type="checkbox"/> \$ 26.00
LIFT		04 <input type="checkbox"/> \$2.15	04 <input type="checkbox"/> \$21.50		04 <input type="checkbox"/> \$31.50	04 <input type="checkbox"/> \$ 62.00	04 <input type="checkbox"/> \$ 682.00
05 <input type="checkbox"/> Employee ID with TriMet sticker							
06 <input type="checkbox"/> College ID with TriMet sticker							
07 <input type="checkbox"/> High school ID with TriMet sticker and/or embedded with TriMet logo							
08 <input type="checkbox"/> Honored Citizen Downtown Pass							
09 <input type="checkbox"/> Other _____							
6. Is your single-fare payment being used for a one-way or a round-trip?				01 <input type="checkbox"/> One-way trip		02 <input type="checkbox"/> Round-trip	
7. If you are using a 1-Day Pass, how many one-way trips will you make on it today? _____							
8. Where did you buy your fare for this trip?							
01 <input type="checkbox"/> Onboard the bus		05 <input type="checkbox"/> Pass by Mail		09 <input type="checkbox"/> Social Service Agency Purchased for me			
02 <input type="checkbox"/> Ticket Vending Machine		06 <input type="checkbox"/> School or Place of Employment		10 <input type="checkbox"/> Other _____			
03 <input type="checkbox"/> TriMet Ticket Office		07 <input type="checkbox"/> Online					
04 <input type="checkbox"/> Retail Store		08 <input type="checkbox"/> Purchased on Streetcar					
9. Do you have a vehicle you could have used to make this trip either as the driver or as a passenger?						01 <input type="checkbox"/> Yes	02 <input type="checkbox"/> No
10. Do you have a checking or savings account?				01 <input type="checkbox"/> Yes		02 <input type="checkbox"/> No	
11. Do you have or use a pre-paid or regular debit or credit card?							
01 <input type="checkbox"/> Yes (check all that apply)		01 <input type="checkbox"/> Pre-paid card		02 <input type="checkbox"/> Bank-issued debit card		03 <input type="checkbox"/> Bank-issued credit card	
02 <input type="checkbox"/> No							
12. Including yourself, how many people live in your household? _____							
13. How many trips have you taken on a TriMet bus/MAX in the last month? (count each direction as one trip) _____							
14. What is your age? _____							
15. Are you a college student?		01 <input type="checkbox"/> Yes, full-time		02 <input type="checkbox"/> Yes, part-time		03 <input type="checkbox"/> No	
If you are a college student, which college?		01 <input type="checkbox"/> PSU		02 <input type="checkbox"/> PCC		03 <input type="checkbox"/> Other _____	
16. Are you: (check one)							
01 <input type="checkbox"/> Asian/Pacific Islander		03 <input type="checkbox"/> Caucasian/White		05 <input type="checkbox"/> Multi-racial/bi-racial		07 <input type="checkbox"/> Other _____	
02 <input type="checkbox"/> African American/Black		04 <input type="checkbox"/> Hispanic/Latino		06 <input type="checkbox"/> Native American Indian			
17. What was your total annual household income before taxes in 2011? (check one)							
01 <input type="checkbox"/> Under \$10,000		03 <input type="checkbox"/> \$20,000 to \$29,999		05 <input type="checkbox"/> \$40,000 to \$49,999		07 <input type="checkbox"/> \$60,000 to \$69,999	
02 <input type="checkbox"/> \$10,000 to \$19,999		04 <input type="checkbox"/> \$30,000 to \$39,999		06 <input type="checkbox"/> \$50,000 to \$59,999		08 <input type="checkbox"/> \$70,000 or more	
						09 <input type="checkbox"/> Don't know	
18. Do you speak a language other than English at home? 01 <input type="checkbox"/> Yes If yes, what language is this? _____ 02 <input type="checkbox"/> No							
Quý vị có nói một ngôn ngữ nào khác ngoài tiếng Anh ở nhà không?				05 <input type="checkbox"/> Có		06 <input type="checkbox"/> Không	
除了英文外，您在家還說其他的語言嗎？				07 <input type="checkbox"/> 是		08 <input type="checkbox"/> 否	
Разговариваете ли вы на каком-либо еще языке, кроме английского, дома?				09 <input type="checkbox"/> Да		10 <input type="checkbox"/> Нет	
집에서 영어가 아닌 다른 언어를 사용하십니까?				11 <input type="checkbox"/> 예		12 <input type="checkbox"/> 아니오	
19. How well do you speak English? 01 <input type="checkbox"/> Very well 02 <input type="checkbox"/> Well 03 <input type="checkbox"/> Not well 04 <input type="checkbox"/> Not at all							
Quý vị nói tiếng Anh khá không?		09 <input type="checkbox"/> Rất khá		10 <input type="checkbox"/> Khá		11 <input type="checkbox"/> Không khá	
您說英文的程度如何？		13 <input type="checkbox"/> 非常好		14 <input type="checkbox"/> 好		15 <input type="checkbox"/> 好	
Как хорошо вы разговариваете на английском языке?		17 <input type="checkbox"/> Очень хорошо		18 <input type="checkbox"/> Достаточно хорошо		19 <input type="checkbox"/> Не очень хорошо	
영어로 어느 정도로 잘 구사하십니까?		21 <input type="checkbox"/> 대단히 잘한다		22 <input type="checkbox"/> 잘한다		23 <input type="checkbox"/> 잘하지 못한다	
						20 <input type="checkbox"/> Вообще не говорю	
						24 <input type="checkbox"/> 전혀 하지 못한다	

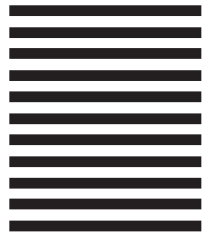
Please return to surveyor or fold, tape 1" from each edge and mail postage-paid. Thank you for taking time to fill out this survey.



BUSINESS REPLY MAIL

FIRST-CLASS MAIL PERMIT NO. 596 PORTLAND OR

POSTAGE WILL BE PAID BY THE ADDRESSEE



TRIMET
ATTN: FINANCIAL PLANNING
4012 S.E. 17TH AVENUE
PORTLAND, OR 97202-9911



Encuesta a los pasajeros de TriMet

Favor de llenar este formulario aún si ya lo recibió en otro tren o autobús.

Estimado Pasajero: TriMet necesita saber algunos datos sobre el viaje que hace en estos momentos. Favor de contestar las siguientes preguntas. Cuando termine entréguelas al encuestador o envíelas por correo.

1. ¿En que línea viaja en estos momentos? Línea # _____ Nombre de la ruta/línea _____	
2. ¿Necesita hacer trasbordos de una línea a otra para completar este viaje en una dirección? 01 <input type="checkbox"/> No <input type="checkbox"/> Sí. Si la respuesta es sí, ¿cuántas veces? 02 <input type="checkbox"/> 1 vez 03 <input type="checkbox"/> 2 veces 04 <input type="checkbox"/> 3 veces o más	
3. Si hace trasbordos en este viaje, ¿de qué líneas a qué líneas trasborda? (no incluya el tren o autobús en que ahora viaja) Línea # _____ Nombre de la ruta/línea _____ Línea # _____ Nombre de la ruta/línea _____ <input type="checkbox"/> MAX <input type="checkbox"/> WES <input type="checkbox"/> Portland Streetcar <input type="checkbox"/> Ruta C-TRAN # _____ <input type="checkbox"/> Transporte SAM _____	
4. ¿Cómo pagó este viaje? (marque una) 01 <input type="checkbox"/> Tarifa de TriMet 02 <input type="checkbox"/> Tarifa de C-TRAN 03 <input type="checkbox"/> Tarifa de Portland Streetcar Si pagó pasaje de Streetcar, ¿qué tipo de pasaje? 01 <input type="checkbox"/> Boleto de 2-horas (\$1) 02 <input type="checkbox"/> Pase Anual Portland Streetcar (\$150)	
5. ¿Qué usó para pagar en TriMet? (marque una)	
01 EFFECTIVO (boleto de 2-horas)	02 BOLETO (talónario de 10)
03 PASE de 1-DÍA	04 PASE de 7-DÍAS
05 PASE de 14-DÍAS	06 PASE de MENSUAL/30-DÍAS
07 PASE ANUAL	
Adultos 01 <input type="checkbox"/> \$2.50 01 <input type="checkbox"/> \$25.00 01 <input type="checkbox"/> \$5.00 01 <input type="checkbox"/> \$26.00 01 <input type="checkbox"/> \$51.00 01 <input type="checkbox"/> \$100.00 01 <input type="checkbox"/> \$1,100.00	
Joven/Estudiante 02 <input type="checkbox"/> \$1.65 02 <input type="checkbox"/> \$16.50 02 <input type="checkbox"/> \$3.30 02 <input type="checkbox"/> \$ 8.00 02 <input type="checkbox"/> \$15.50 02 <input type="checkbox"/> \$ 30.00 02 <input type="checkbox"/> \$ 330.00	
Ciudadano Honorable/STAR 03 <input type="checkbox"/> \$1.00 03 <input type="checkbox"/> \$10.00 03 <input type="checkbox"/> \$2.00 03 <input type="checkbox"/> \$ 7.00 03 <input type="checkbox"/> \$13.50 03 <input type="checkbox"/> \$ 26.00 03 <input type="checkbox"/> \$ 286.00	
LIFT (servicio de transporte para discapacitados) 04 <input type="checkbox"/> \$2.15 04 <input type="checkbox"/> \$21.50 04 <input type="checkbox"/> \$31.50 04 <input type="checkbox"/> \$ 62.00 04 <input type="checkbox"/> \$ 682.00	
05 <input type="checkbox"/> Identificación de empleado con etiqueta de TriMet	
06 <input type="checkbox"/> Identificación de la universidad con etiqueta de TriMet	
07 <input type="checkbox"/> Identificación de Escuela Preparatoria con etiqueta de TriMet	
08 <input type="checkbox"/> Pase de Ciudadano Honorable para el centro de la ciudad	
09 <input type="checkbox"/> Otra _____	
6. Si pagó un solo pasaje, ¿es para un viaje de ida o de ida y vuelta? 01 <input type="checkbox"/> Viaje de ida 02 <input type="checkbox"/> Viaje de ida y vuelta	
7. Si viaja con un pase de 1 día, ¿cuántos viajes sencillos hará con él el día de hoy? _____	
8. ¿Dónde compró su pasaje para este viaje?	
01 <input type="checkbox"/> A bordo del autobús	05 <input type="checkbox"/> Pase por correo
02 <input type="checkbox"/> En una máquina expendedora de boletos	06 <input type="checkbox"/> En la escuela o el lugar de trabajo
03 <input type="checkbox"/> En una oficina de boletos de TriMet	07 <input type="checkbox"/> En línea
04 <input type="checkbox"/> En una tienda	08 <input type="checkbox"/> Lo compré en el tranvía
09 <input type="checkbox"/> Una agencia de servicio social lo compró para mí	
10 <input type="checkbox"/> Otro _____	
9. ¿Tiene un vehículo que podría haber usado para hacer este viaje ya sea como conductor o como pasajero? 01 <input type="checkbox"/> Sí 02 <input type="checkbox"/> No	
10. ¿Tiene cuenta bancaria de ahorros o cheques? 01 <input type="checkbox"/> Sí 02 <input type="checkbox"/> No	
11. ¿Tiene o usa tarjeta prepagada, tarjeta de débito o tarjeta de crédito?	
01 <input type="checkbox"/> Sí (marque todo lo que aplica)	01 <input type="checkbox"/> Tarjeta prepagada 02 <input type="checkbox"/> Tarjeta bancaria de débito 03 <input type="checkbox"/> Tarjeta bancaria de crédito
02 <input type="checkbox"/> No	
12. Incluyendo a usted, ¿Cuántas personas viven en su hogar? _____	
13. En los últimos 30 días, ¿cuántas veces se ha transportado en autobuses de TriMet/MAX? (cuente cada dirección como un recorrido) _____	
14. ¿Cuál es su edad? _____	
15. ¿Es Ud. estudiante universitario? 01 <input type="checkbox"/> Sí, a tiempo completo 02 <input type="checkbox"/> Sí, a medio tiempo 03 <input type="checkbox"/> No	
Si es Ud. estudiante universitario, ¿a qué universidad o college asiste? 01 <input type="checkbox"/> PSU 02 <input type="checkbox"/> PCC 03 <input type="checkbox"/> Otro _____	
16. ¿Es Ud.: (marque sólo uno)	
01 <input type="checkbox"/> Asiático/De las Islas del Pacífico	03 <input type="checkbox"/> Caucásico/Blanco
02 <input type="checkbox"/> Afroamericano/Negro	04 <input type="checkbox"/> Hispano/Latino
05 <input type="checkbox"/> Multiracial/biracial	07 <input type="checkbox"/> Otro _____
06 <input type="checkbox"/> Nativo Americano	
17. ¿Cuál fue el ingreso anual de su hogar antes del pago de impuestos para el año 2011? (marque un cuadro)	
01 <input type="checkbox"/> Menos de \$10,000	03 <input type="checkbox"/> \$20,000 a \$29,999
02 <input type="checkbox"/> \$10,000 a \$19,999	04 <input type="checkbox"/> \$30,000 a \$39,999
05 <input type="checkbox"/> \$40,000 a \$49,999	06 <input type="checkbox"/> \$50,000 a \$59,999
07 <input type="checkbox"/> \$60,000 a \$69,999	08 <input type="checkbox"/> \$70,000 o más
09 <input type="checkbox"/> No sé	
18. ¿Habla un idioma que no sea inglés? 03 <input type="checkbox"/> Sí ¿Qué idioma es ese? _____ 04 <input type="checkbox"/> No	
19. ¿Cuán bien habla el inglés? 05 <input type="checkbox"/> Muy bien 06 <input type="checkbox"/> Bien 07 <input type="checkbox"/> No bien 08 <input type="checkbox"/> No hablo inglés	

Entregue la tarjeta al encuestador o dóblela, péguela y envíela por correo. No necesita estampilla. Gracias por su atención.

Date: December 10, 2014

To: Board of Directors

From: Neil McFarlane *Neil McFarlane*

Subject: **ORDINANCE NO. 332 OF THE TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET) EXTENDING TRANSFER TIMES FROM TWO HOURS TO TWO AND ONE-HALF HOURS, AND AMENDING TRIMET CODE CHAPTER 19 TRANSFER PROVISIONS (SECOND READING)**

1. Purpose of Item

Ordinance No. 332 amends TriMet Code Chapter 19 transfer provisions and extends transfer times for cash and ticket fares. The changes would become operative on March 1, 2015, and are described further below in Sections 5, Background and 6, Community Outreach and Feedback.

2. Type of Agenda Item

- Initial Contract
- Contract Modification
- Other: Ordinance

3. Reason for Board Action

The TriMet Code may be amended only by adoption of an ordinance. Ordinance No. 332 requires two readings. A first reading and a public hearing were held at the December 11, 2013 Board meeting. At its January 22, 2014 meeting, the Board of Directors ("Board") tabled Ordinance No. 332 for a second reading pending resolution of a Title VI complaint filed by OPAL with the Federal Transit Administration ("FTA"). The OPAL complaint having been dismissed by the FTA, and further guidance from FTA regarding its Title VI requirements for fare transfers having been provided, this will be the second reading and additional public hearing for Ordinance No. 332.

4. Type of Action:

- Resolution
- Ordinance 1st Reading
- Ordinance 2nd Reading
- Other

5. Background

TriMet's transfer policy requires that a customer need only board the last vehicle of their trip before their transfer/ticket expires; they do not need to complete their trip before it expires. With the installation of ticket printers on all buses by July 1, 2013, TriMet began issuing printed tickets with the exact time allowed for boarding of the last vehicle to reach their destination. This was the first time in TriMet's history that tickets/transfers on buses could be issued for specific times, eliminating antiquated tissue paper transfers. This change allowed TriMet buses to match the two-hour travel time allowed for tickets purchased from ticket vending machines at MAX and WES platforms and eliminated the imprecise tissue transfer. It also was responsive to community feedback to have bus transfer times match those on the MAX system.

Ordinance No. 332 proposes to extend transfer times on all modes of travel from the current two (2) hours to two and-one-half (2.5) hours. This would allow more time for riders who transfer between lines with service that may operate less frequently, such as early morning, late evenings, or on weekends, so they are able to reach their final destination with a single fare. An additional, unintended benefit for riders taking short distance trips is that they may be able to complete a round trip or take multiple trips with the added time.

In accordance with FTA Title VI Circular 4702.1B implementing Title VI of the Civil Rights Act, fare changes must be analyzed to identify impacts to minority and low-income populations. Recent guidance from the FTA to TriMet states that a transfer policy change is considered to be a fare change, requiring TriMet to conduct a fare equity analysis of the proposed changes.

TriMet Diversity and Transit Equity staff prepared a Title VI fare equity analysis ("Proposed Transfer Change Fare Equity Analysis") ("Analysis"), which evaluates adverse effects as well as benefits associated with the proposed transfer change. A "disparate impact" may exist if negative impacts are disproportionately borne by minority riders, or if minority riders do not stand to benefit to the same extent as non-minority riders. A "disproportionate burden" may exist if these same conditions apply to low-income riders. The Analysis finds no disparate impact on minority riders and no disproportionate burden on low-income riders. The Analysis indicates that minority riders are just as likely as non-minority riders to benefit from the increase in transfer time, and low-income riders are somewhat more likely to benefit than higher income riders.

The Analysis was submitted to the FTA Region X Civil Rights Officer for review. The Analysis was also submitted to TriMet's Transit Equity Advisory Committee ("TEAC") for their review and comment, and the Analysis has been posted on TriMet's website and available for public review. Staff submitted the Analysis to the Board at its November 19, 2014 Board meeting. Having reviewed and considered the Analysis, the Board determined to proceed with the second reading and consideration of Ordinance No. 332 at its December 10, 2014 meeting.

6. Community Outreach and Feedback

The issue of extending transfer time was first raised by the community advocacy group OPAL, which proposed extending transfer times to three hours and allowing transfers issued after 7 p.m. to be valid through the end of the service day.

In September 2011, the TriMet Board directed staff to meet with OPAL and experts in the field of public transportation to consider the impact of OPAL's proposal and report back to the Board. TriMet's Diversity and Transit Equity Department co-convened a meeting of OPAL, Multnomah County Health Department, Portland State University and other community organizations to assess the scope and impact of the three hour transfer proposal. Following this meeting, OPAL and TriMet continued to meet to discuss the proposal's financial impact. TriMet hired economics consultant ECONorthwest to provide an independent financial review of the proposal. In 2011, ECONorthwest estimated that the OPAL proposal would cost between \$900,000 and \$2.1 million. The Board stated that given financial constraints it would be unable to support the proposal at that time. However, TriMet has responded to concerns by creating a day pass at the low multiple of two single tickets, establishing the Access Transit fare subsidy programs, and prioritizing restoration of frequent service to ease transferring.

In 2013, OPAL requested TriMet reconsider the transfer proposal. Given new travel data available, TriMet retained ECONorthwest to update the cost analysis. In its report "Revenue Impacts of Proposed Changes to TriMet's Transfer Policy" ECONorthwest estimated that TriMet would lose between \$2.0 million and \$3.5 million in revenue annually if it implemented OPAL's proposal.

During the summer of 2013, TriMet's Department of Diversity and Transit Equity entered into a series of facilitated discussions with OPAL on the transfer issue. This process entailed a detailed review of the ECONorthwest report which resulted in general agreement on the financial impact and that the transfer policy should be viewed in a larger context. The working group also agreed that ultimately the Board must set priorities and make policy decisions.

TriMet continues to discuss issues of transit equity with its Transit Equity Advisory Committee, on which OPAL has two representatives.

At its October 2013 retreat, the Board extensively reviewed the transfer proposal. At that time, the general consensus was to drop the "unlimited rides after 7 p.m." portion of the OPAL proposal due to enforcement ambiguities. At its November 2013 business meeting, the Board asked that the Ordinance be advanced for consideration with a 2.5 hour transfer.

Public Comment and Outreach

Public comment on the proposed transfer change is accepted by phone, email and standard mail. A summary of comments received via these venues has been provided to the Board prior to the December 10, 2014 Board meeting. In addition, verbal and written comments may be provided during Public Forum and during the Public Hearing for Ordinance No. 332 at the December 10, 2014 Board meeting.

7. **Financial/Budget Impact**

Attachment A to this memorandum compares the annual costs between the current 2.0 hour transfer, the proposed 2.5 hour transfer in Ordinance 332, and the OPAL-requested 3.0 hour transfer.

Given limited resources, there are no independent financial decisions. To pay for the expected recurring revenue loss of the two and half hour transfer (\$1.2M), future budgets would need to be adjusted, either through revenue increases or expenditure reductions.

When the Board first considered this Ordinance, it reviewed the option of partially offsetting this revenue loss with any unused portion of the \$1.3M budgeted for TriMet's Access Transit Subsidy programs. However, the Access Transit programs are projected to be fully utilized in FY15.

8. **Impact if Not Approved**

Should the Board not proceed with a second reading of Ordinance No. 332, the existing TriMet Code transfer provisions would remain in place.

Transfer Proposal



TriMet's current transfer policy requires that a customer need only board the last vehicle of their trip before their transfer/ticket expires (2 hours); they do not need to complete their trip before it expires. With the installation of ticket printers on all buses effective July 1, 2013, TriMet began issuing printed tickets with the exact time allowed for travel, such as two hours from the time of purchase.

The intent of the timed transfer policy has been to provide the customer enough time to complete a trip, in one direction – any roundtrips have been an unintended benefit.

	2.0 Hours (no change)	2.5 Hours	3 Hours
Revenue	Neutral	Forgone revenue range: \$0.9M to \$1.9M – likely \$1.2M	Forgone revenue range: \$2.0M to \$3.5M - likely \$2.65M
		Opportunity cost (what could the revenue be used for, such as increased service)	Opportunity cost (what could the revenue be used for, such as increased service)
Rides	Status quo	Approximately 1.1 million additional free trips, of this 290,000 are new trips attracted to transit because of the 2.5 hours transfer	Approximately 1.6 million additional free trips, of this 400,000 are new trips attracted to transit because of the 3 hours transfer
Benefits	Customers understand current transfer policy	Allows customer more time to transfer between vehicles to complete a trip	Allows customer more time to transfer between vehicles to complete a trip
	Operators/Fare Inspectors understand and enforce current transfer policy	Accommodates trips occurring between service that may operate less frequently	Accommodates trips occurring between service that may operate less frequently
	More consistent with policy intent to provide one-way trips on a single fare – Day Passes now offered as an affordable option for round trips	Allows more individuals to roundtrip on a single fare	Allows more individuals to roundtrip on a single fare
	Access Transit subsidy programs remain in current form at \$1.3M		
	Allows transfer extension time to be raised as potential mitigation in context of efare policies		

Drawbacks	In rare instances, some individuals may not be able to transfer in the time allotted	Implementation and cost of system changes: replacement of all customer information, reconfiguring equipment – (including TVMs, validators, on-board ticket printers, mobile app)	Implementation and cost of system changes: replacement of all customer information, reconfiguring equipment – (including TVMs, validators, on-board ticket printers, mobile app)
		Education, training, outreach – internal and external	Education, training, outreach – internal and external
		Will require budget tradeoffs to balance future budgets	Will require budget tradeoffs to balance future budgets
		Less consistent with policy intent to provide one-way trips on a single fare – Day Passes now offered as an affordable option for round trips	Less consistent with policy intent to provide one-way trips on a single fare – Day Passes now offered as an affordable option for round trips
		Separated from comprehensive eFare policy/pricing package and its associated analysis.	Separated from comprehensive eFare policy/pricing package and its associated analysis.

ORDINANCE NO. 332

AN ORDINANCE OF THE TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET) EXTENDING TRANSFER TIMES FROM TWO HOURS TO TWO AND ONE-HALF HOURS, AND AMENDING TRIMET CODE CHAPTER 19 TRANSFER PROVISIONS

THE BOARD OF DIRECTORS OF THE TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET), pursuant to the authority of Oregon Revised Statutes Chapter 267, does hereby ordain and decree the following Ordinance:

Section 1 – Amendment of TriMet Code Chapter 19 Transfer Provisions

The following provisions of TriMet Code (TMC) Section 19.25 Transfers are amended as set forth below. Deleted text is shown in brackets with strikeout, and new text is shown in bold, underlined print.

19.25 Transfers.

A passenger may transfer freely from one regularly scheduled TriMet route to another in accordance with the status of the rider applicable to the passenger’s means of payment, and during the time allotted on the transfer. Therefore:

* * *

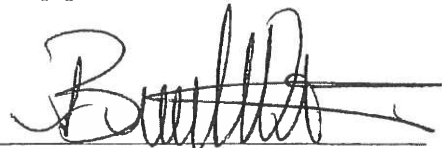
[G. — Bus transfers that are manually issued by operators are valid for one hour past the scheduled end of the trip time for the bus on weekdays, two hours on weekends. The end of the trip is generally the Mall in Downtown Portland, a transit center, or the end of the line.]

[H.] G. Printer issued bus transfer receipts and validated machine tickets are also transfers. MAX station machine tickets are issued to be valid for two and one-half hours from the time of validation. A printer issued bus transfer receipt is a valid transfer for two and one-half hours from the time of purchase.

Section 2 – Effective/Operative Date

This Ordinance shall take effect thirty days after the date of its adoption. The amendments to TMC Section 19.25 shall become operative on March 1, 201[4]5.

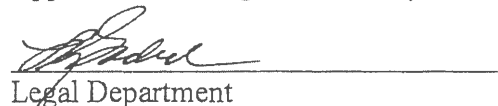
Date Adopted: 12/10/14



Presiding Officer

Attest:
Kelly Ruxxon
Recording Secretary

Approved as to Legal Sufficiency:


Legal Department

2. General Manager Report

- A. **GM Comments** – Neil McFarlane, General Manager, reported on:
- **October ridership** is up more than three percent across the board.
 - **Be Seen Be Safe Campaign** has grown not only regionally, but state-wide with 25 regional partners and ODOT's Drive Less Save More campaign. Special thanks to ODOT for providing 20,000 blinking lights and to KGW for being our media sponsor.
 - **Powell-Division Transit Project** contract will come before the Board in December that would select a consultant team to provide conceptual design and service planning services. This would supplement work by TriMet staff to ensure the design and planning leads to the best possible project that improves transit and supports the people, jobs, and educational opportunities in the corridor.
- B. **Crime Stats / Security Update** – Harry Saporta, Safety and Security Executive Director and Lt. Eric Schober, TriMet Police Division, provided a PowerPoint presentation and answered Board questions on mid-year crime results, regional trends, security strategies, TSA grants, street level outreach, and public education. The presentation is available on TriMet's website.
- C. **Performance Indicators** – Bob Nelson, Interim Deputy General Manager, reported on the key performance indicators in this quarter's performance report. A report was distributed and is available on TriMet's website.
- D. **Title VI Fare Equity Analysis** – Neil McFarlane explained that the Board received a copy of the initial draft of the Title VI Equity Analysis for Ordinance 332 that would extend transfer times to 2 ½ hours. Neil McFarlane stated that TriMet has been in communication with FTA Regional Civil Rights office and was informed that our initial analysis meets FTA requirements.

Johnell Bell, Director of Diversity and Transit Equity, and Jake Warr, Policy Advisor, provided an in depth overview of the analysis and its findings and answered Board questions. The PowerPoint presentation and the analysis are available on TriMet's website.

Johnell Bell stated that as Board Member Saragoza reported, the Equity Analysis will be reviewed by the Transit Equity Advisory Committee at their November 20th meeting.

TriMet Board of Directors Meeting
November 19, 2014

Board President Warner asked the Board if they were comfortable with the conclusions of the Equity Analysis and discussed the next steps for a second reading of Ordinance 332 that would increase transfer times from two hours to two and half hours.

Board President Warner explained that the first reading of Ordinance 332 was in December 2013, and then in January the Board voted to table the Ordinance until TriMet received further guidance from the FTA on whether a change in transfer times constituted a “fare change”, triggering the need for an equity analysis. President Warner stated that having learned this summer that the answer to that question was “yes”, TriMet has been working with existing data and the FTA to prepare and finalize the equity analysis that was just presented.

Board President Warner suggested that since all Board members are comfortable with the analysis, and as long as the FTA or TEAC does not have any issues with the equity analysis, that the Board direct TriMet to place Ordinance 332 on the agenda for a second reading and public hearing at their December 10 meeting. President Warner explained that the Board would first have a formal motion to untable Ordinance 332, and assuming that passes, the Board would then proceed to a second reading and public hearing on Ordinance 332.

With the Board’s agreement, President Warner asked staff to place Ordinance 332 on the December 10th Board agenda for a second reading and public hearing.

3. Consent Agenda

Action: Travis Stovall moved adoption of the consent agenda items listed below; T. Allen Bethel seconded the motion. The motion was unanimously approved.

Approval of Minutes for October 22, 2014

Resolution 14-11-54 Authorizing a Modification to the Contract with Woojin IS America, Inc. for Communication System Retrofits on Type 1, 2 and 3 Light Rail Vehicles

TriMet Board of Directors Meeting
December 10, 2014

committed to working with other minority firms with a goal of 7-10% as part of the overall contract.

Action: Joe Esmonde moved approval of Resolution 14-12-59; Craig Prosser seconded the motion. The motion was unanimously approved.

Resolution 14-12-60 Adopting a Service Guidelines Policy

Action: After general discussion, T. Allen Bethel moved approval of Resolution 14-12-60; Travis Stovall seconded the motion. The motion was unanimously approved.

5. Ordinances & Public Hearing

Ordinance 332 Extending Transfer Times from Two Hours to Two and One-Half Hours, and Amending TriMet Code Chapter 19 Transfer Provisions (Second Reading)

President Warner introduced Ordinance 332 that would increase transfer times on TriMet from two hours to two and a half hours. Ordinance 332 had its first reading in December 2013, and then in January 2014 the Board unanimously voted to table the Ordinance until they received further guidance from the FTA on whether a change in transfer times constituted a “fare change”, triggering the need for an equity analysis. Having learned this summer that the answer to that question was “yes” when considering future transfer changes, TriMet has been working with existing data and the FTA to prepare and finalize the equity analysis. That analysis was presented to the Board at the November Board meeting, and seeing no objections or questions to the analysis, the Board directed staff to place Ordinance 332 on the December business meeting agenda for a second reading and public hearing.

President Warner explained the need for a motion to untable the Ordinance to move it forward for consideration of the second reading.

Action: Travis Stovall moved to untable Ordinance 332; Consuelo Saragoza seconded the motion. The motion was unanimously approved.

Shelley Devine read Ordinance 332 by title only, noting that the operative date is March 1, 2015.

Attachment J

WEEKEND FREQUENT SERVICE RESTORATION EQUITY ANALYSIS,
WITH DOCUMENTATION OF BOARD APPROVAL



Equity Analysis: Weekend Frequent Service Restoration

FINAL

Department of Diversity & Transit Equity

March 3, 2015

I. Background

Continuing an agency commitment made in 2009, TriMet plans to complete the final two phases of Frequent Service restoration in March, June, and September of 2015. This would bring all MAX light rail and Frequent Service bus lines to 15-minute frequencies (or better) throughout the day, seven days a week.

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

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

The FTA has provided specific implementing guidelines and regulations for complying with Title VI in Circular 4702.1B (“Circular”). Due to the interrelated nature of race/ethnicity and income, the Circular instructs transit agencies to consider impacts on low-income populations as well as minority populations; the assessment of potential Title VI issues related to service changes is completed through a service equity analysis. Figure 1 below shows the sequence of steps and considerations in the equity analysis process.

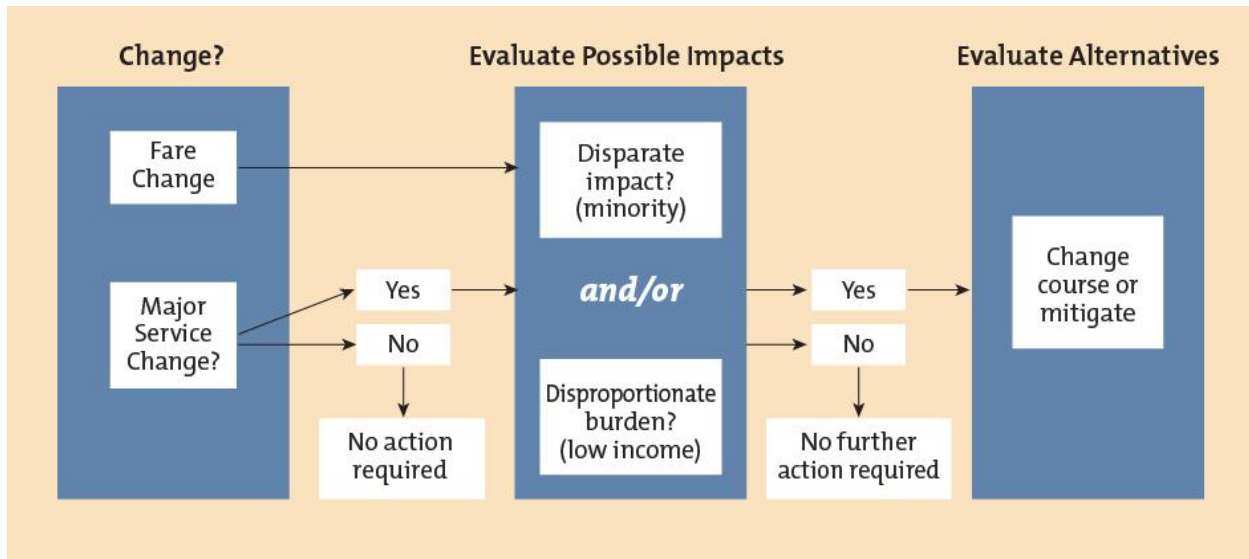


Figure 1: Overview of Title VI Equity Analysis

II. TriMet Title VI Compliance

In the fall of 2013, TriMet updated its Title VI Program, which received concurrence by the FTA in January 2014. The program outlines agency policies, definitions and procedures for complying with Title VI and performing equity analyses. This includes the agency's Major Service Change, Disparate Impact, and Disproportionate Burden policies.

A. Major Service Change Policy

All changes in service meeting the definition of Major Service Change are subject to a Title VI Equity Analysis prior to Board approval of the service change. A Title VI Equity Analysis will be completed for all Major Service Changes and will be presented to the 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 as defined in the Introduction of TriMet's Title VI Program.
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.

B. Disparate Impact Policy

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

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.

For lines with Major Service Changes, if the percentage of minority population in block groups¹ served by the impacted portion of the line (sum of minority population in all impacted block groups divided by the total population in all impacted block groups) exceeds the percentage of minority population in the TriMet District as a whole, the impacts of changes to the line will be considered disparate.

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 (sum of minority population in all impacted block groups divided by the minority population of the TriMet District as a whole) is compared to the percentage of impacted non-minority population (sum of non-minority population in all impacted block groups divided by the non-minority population of the TriMet District as a whole). Comparisons of impacts between minority and non-minority 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.

C. Disproportionate Burden Policy

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

III. Proposed Service Changes

A. Description of Changes

The Frequent Service Network includes the following routes:

4-Division/Fessenden

6-Martin Luther King Jr Blvd

8-Jackson Park/NE 15th

9-Powell Blvd

¹ TriMet's 2013 Title VI Program states that the geographic unit of measurement will be tracts instead of block groups, but FTA C 4702.1B instructs transit agencies to evaluate impacts at the block or block group level.

12-Barbur/Sandy Blvd
14-Hawthorne
15-Belmont/NW 23rd
33-McLoughlin
54/56-Beaverton-Hillsdale Hwy/Scholls Ferry Rd
57-TV Hwy/Forest Grove
72-Killingsworth/82nd
75-Cesar Chavez/Lombard
MAX Blue Line
MAX Green Line
MAX Red Line
MAX Yellow Line

All of these routes, with the exception of the Line 72-Killingsworth/82nd, are proposed to receive additional service on Saturdays (beginning March 2015 for bus, June 2015 for MAX) and Sundays (beginning June 2015 for MAX, September 2015 for bus) to meet the Frequent Service standard of 15-minute headways for most of the day, seven days a week. The Line 72 already meets this standard. This additional service builds upon the steps taken to restore Frequent Service thus far, including adding service on weekday mid-days in spring 2014 and weekday evenings in fall 2014.

B. Major Service Change Test

To determine whether individual service changes meet the definition of Major Service Change, current and proposed service are compared. Revenue vehicle hours, or the number of hours buses are serving riders, are used to determine changes in service by route; results are shown in Tables 1 and 2.

To summarize, a total of five lines meet TriMet's adopted Title VI Major Service Change definition, with service increases of over 25% compared to current service:

8-Jackson Park/NE 15th (Sundays)
9-Powell Blvd (Saturdays and Sundays)
15-Belmont/NW 23rd (Sundays)
33-McLoughlin (Sundays)
54/56-Beaverton-Hillsdale Hwy/Scholls Ferry Rd (Saturdays)

Table 1: Change in service hours by line (Saturdays)

Line	Current Saturday Revenue Vehicle Hours	Proposed Saturday Revenue Vehicle Hours*	Change in Daily Revenue Hours From Current Quarter	Major Service Change?
4-Division/Fessendent	221	225	2%	
6-Martin Luther King Jr Blvd	80	95	18%	
8-Jackson Park/NE 15 th	74	90	21%	
9-Powell Blvd	106	135	27%	✓
12-Barbur/Sandy Blvd	129	157	22%	
14-Hawthorne	64	75	17%	
15-Belmont/NW 23 rd	94	113	20%	
33-McLoughlin	85	101	18%	
54/56-Beaverton-Hillsdale Hwy/Scholls Ferry Rd	59	76	28%	✓
57-TV Hwy/Forest Grove	103	123	20%	
72-Killingsworth/82 nd	199	199	0%	
75-Cesar Chavez/Lombard	148	178	21%	
MAX Blue Line	238	267	12%	
MAX Green Line	78	88	13%	
MAX Red Line	114	129	13%	
MAX Yellow Line	70	79	13%	

**Estimated for MAX lines based on estimated number of trips being added. Projected revenue hours unavailable for MAX when analysis conducted.*

Table 2: Change in service hours by line (Sundays)

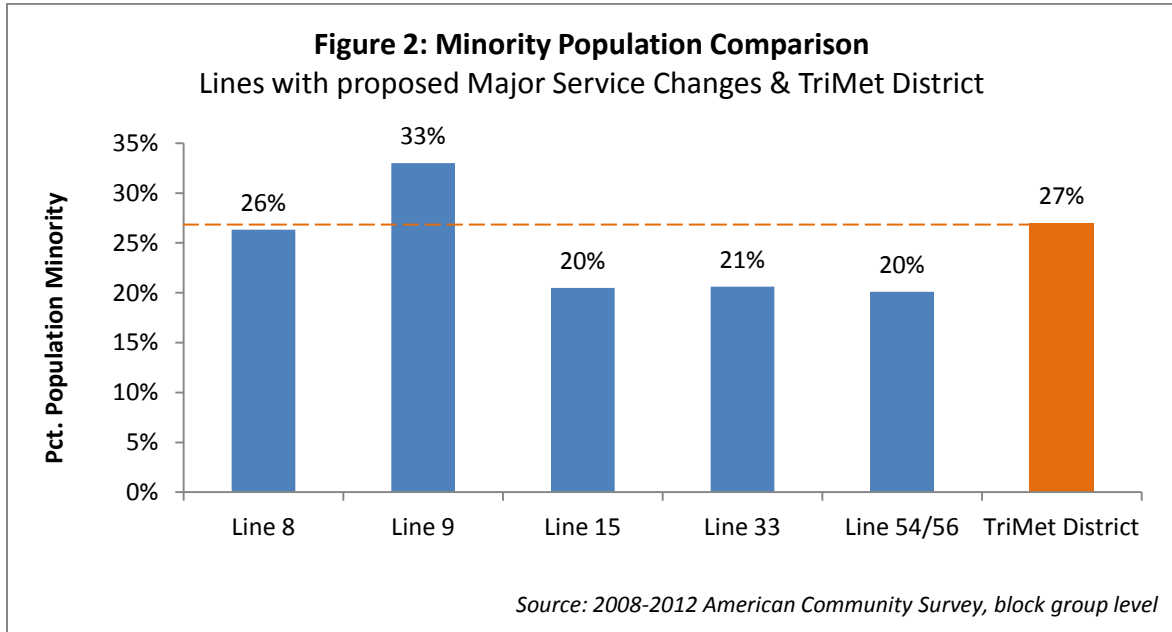
Line	Current Sunday Revenue Vehicle Hours	Proposed Sunday Revenue Vehicle Hours*	Change in Daily Revenue Hours From Current Quarter (%)	Major Service Change?
4-Division/Fessendent	189	203	8%	
6-Martin Luther King Jr Blvd	80	93	16%	
8-Jackson Park/NE 15 th	63	80	27%	✓
9-Powell Blvd	106	134	26%	✓
12-Barbur/Sandy Blvd	127	152	20%	
14-Hawthorne	58	68	17%	
15-Belmont/NW 23 rd	84	109	30%	✓
33-McLoughlin	76	97	28%	✓
54/56-Beaverton-Hillsdale Hwy/Scholls Ferry Rd	61	70	14%	
57-TV Hwy/Forest Grove	103	122	19%	
72-Killingsworth/82 nd	167	167	0%	
75-Cesar Chavez/Lombard	148	177	20%	
MAX Blue Line	205	232	13%	
MAX Green Line	73	85	16%	
MAX Red Line	105	120	15%	
MAX Yellow Line	63	72	14%	
<i>*Estimated for MAX lines based on estimated number of trips being added. Projected revenue hours unavailable for MAX when analysis conducted.</i>				

C. Line-level Analyses

Having identified the proposed changes on lines that meet the definition of Major Service Change, the next step in the equity analysis is to look at each line individually to determine how equitable the potential impacts would be across racial/ethnic and economic lines. In the event of service reductions, TriMet analyzes whether minority and low-income populations stand to be disproportionately and adversely affected by the proposed changes. In this case, the proposal includes only service *increases*, and therefore the analysis examines the extent to which the benefits of the improvements are inclusive of minority and low-income populations.

Disparate Impact Analysis

The line-level Disparate Impact analysis compares minority populations for the service area of each line to the minority population of the TriMet District as a whole. Figure 2 displays this comparison.



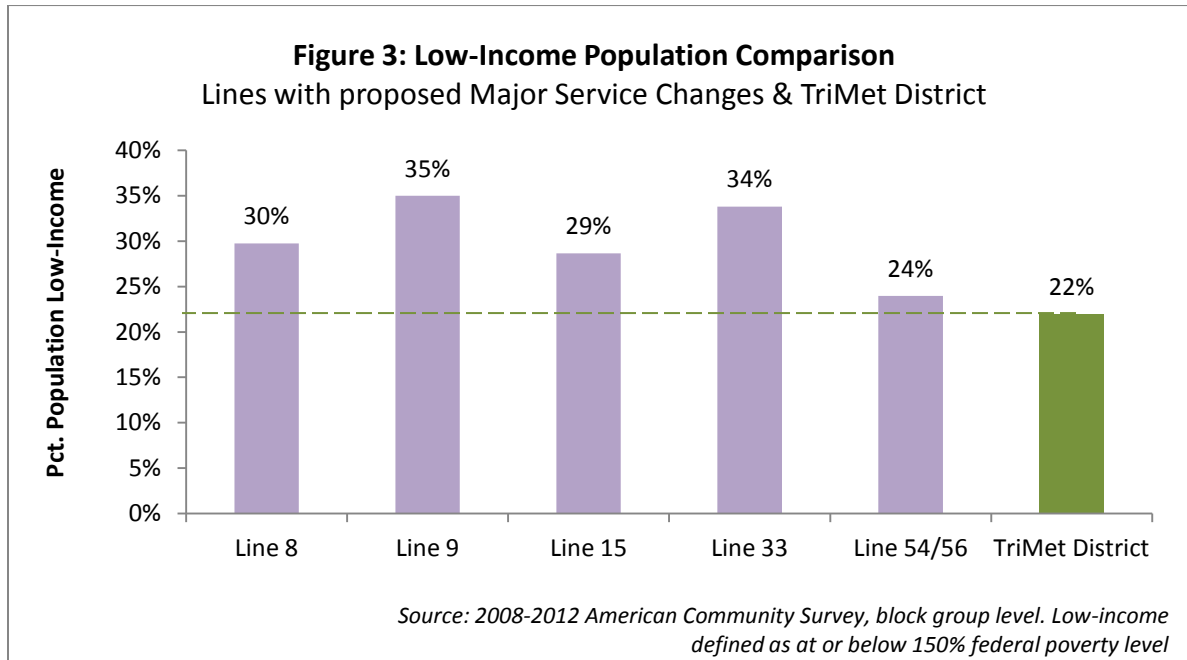
At 33% people of color, the service area of the Line 9 has a minority population that is higher than average for the TriMet District. In other words, increasing the Line 9 to Frequent Service on the weekends appears to benefit minorities to a greater extent than non-minorities. At the line level, this leads to a finding of no Disparate Impact.

On the other hand, each of the remaining four lines has a lower-than-average minority population compared to the TriMet district. That is, the Major Service Change improvements in each of these four cases stand to disproportionately serve non-minority populations, indicating a potential Disparate Impact at the line level, and calling for further examination to ensure that the change would not have discriminatory effects. The results of the system-level analysis and the context of the service change are part of this further examination, and are provided later in this report..

Disproportionate Burden Analysis

The line-level Disproportionate Burden analysis compares low-income populations for the service area of each line proposed for a Major Service Change to the low-income population of the TriMet District as a whole. As established in TriMet’s adopted Title VI Program, low-income is defined as a household with annual income at or below 150% of the Federal Poverty Level. Figure 3 displays this comparison.

As shown, the service area of each individual line has a higher-than-average low-income population for the TriMet District, which is 22% low-income as a whole. The highest proportions are along the Line 9 (35%) and Line 33 (34%). This indicates that the service improvements have the potential to benefit low-income populations to a greater extent than higher-income populations. Thus, no Disproportionate Burden exists at the line level.



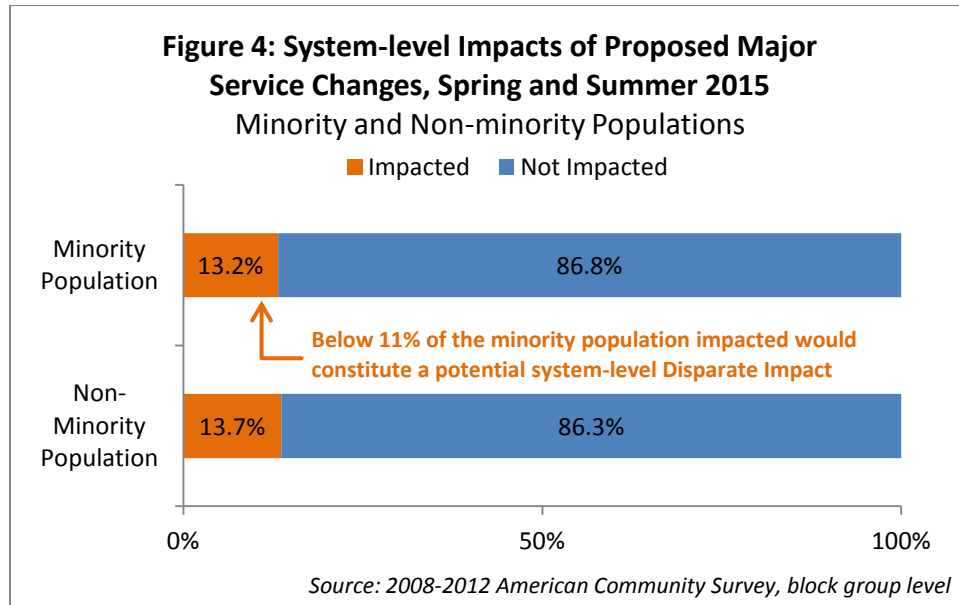
D. System-level Analysis

Because multiple lines are proposed for Major Service Changes, a system-level analysis is required in addition to the line-level analysis. The system-level analysis aims to measure impacts of all Major Service Changes combined to determine how equitable the impacts would be across racial/ethnic and economic lines. Once again, the relative potential *benefits* of the service increases are compared between populations (minority vs. non-minority, and low-income vs. higher income) since the proposal includes only service increases.

Disparate Impact Analysis

The system-level Disparate Impact analysis is completed by determining what proportion of the TriMet District’s minority population is positively impacted by the Major Service Changes, and comparing that to the District’s non-minority population that is positively impacted. A potential Disparate Impact would exist if 20% less of the District’s minority than non-minority population (or 4/5) stood to benefit from the Major Service Changes, per TriMet’s adopted Title VI policies.

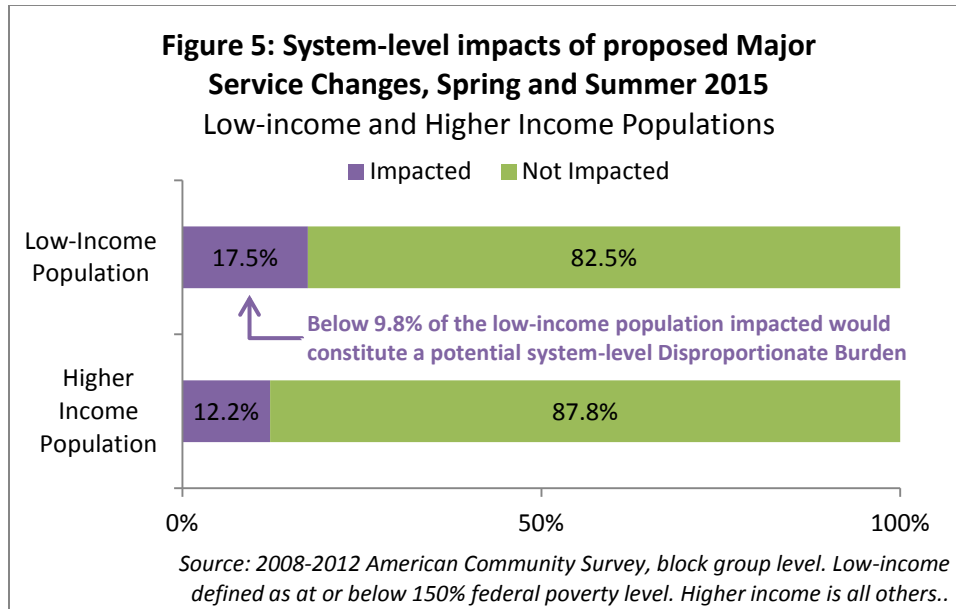
Figure 4 compares the impacted minority and non-minority populations. As shown, percentages are very close between impacted minority and non-minority populations (13.2% vs. 13.7%, respectively). Given the 13.7% of non-minorities positively impacted by the set of Major Service Changes, the percentage of minorities impacted would have to be below 4/5 of that figure (or 11%) to meet the definition of a system-level Disparate Impact. Therefore, no system-level Disparate Impact is found.



Disproportionate Burden Analysis

The system-level Disproportionate Burden analysis is completed by determining what proportion of the TriMet District’s low-income population is positively impacted by the Major Service Changes, and comparing that to the District’s higher income population that is positively impacted. “Higher income” includes all persons above the low-income threshold of 150% federal poverty. A potential Disproportionate Burden would exist if 20% less of the District’s low-income than higher income population (or 4/5) stood to benefit from the Major Service Changes, per TriMet’s adopted Title VI policies.

Figure 5 compares the impacted low-income and higher income populations. A greater percentage of the District’s low-income population stands to benefit from the proposed Major Service Changes as compared to the higher income population (17.5% vs. 12.2%, respectively). Given the 12.2% of higher income persons positively impacted by the set of Major Service Changes, the percentage of minorities impacted would have to be below 4/5 of that figure (or 9.8%) to meet the definition of a system-level Disproportionate Burden. Therefore, no system-level Disproportionate Burden is found.



E. Summary & Discussion

Table 3 summarizes the results of the line-level and system-level Disparate Impact and Disproportionate Burden analyses. None of the analyses indicated a potential Disproportionate Burden, meaning the proposed Major Service Changes (all service increases) are equally-or-more beneficial to low-income populations, compared to higher income populations.

Improvements to the Line 9 have the potential to be more beneficial to minority populations as compared to non-minority populations due to the demographics of its service area. On the other hand, the service areas of the other four Major Service Change lines have below-average minority populations. Looking at all Major Service Changes combined, however, shows that the changes actually serve a similar proportion of the district's minority population as compared to the non-minority population. Thus, the combined (system-level) analysis found no potential Disparate Impact.

Further context provides a "substantial legitimate justification"² for TriMet to move forward with the service proposal as planned, despite flagging four of the Major Service Change lines as having below-average minority populations in their service areas, and therefore potential Disparate Impacts at the line level:

²See FTA C 4702.1B Ch. IV-16 and CFR 49 part 2.

Table 3: Summary of Disparate Impact and Disproportionate Burden analysis results

	Potential Disparate Impact?	Potential Disproportionate Burden?
8-Jackson Park/NE 15th	Yes	No
9-Powell Blvd	No	No
15-Belmont/NW 23rd	Yes	No
33-McLoughlin	Yes	No
54/56-Beaverton-Hillsdale Hwy/Scholls Ferry Rd	Yes	No
Combined (System-level)	No	No

First, the objective of the Frequent Service Network is to allow TriMet customers to make trips throughout the day, the evening, and on weekends, with confidence that there will be a bus or train to get them home. It is meant to operate as a network, and its effectiveness is reflected in the fact that the network carries 58% of bus system rides, while only using 48% of the bus system’s service hours. In other words, Frequent Service lines are the most heavily utilized lines in the TriMet system, and provide a healthy return on investment for TriMet riders.

The context of TriMet’s efforts to restore Frequent Service provides further justification of moving forward with the service investments as planned. When the agency was facing budget shortfalls due to the Great Recession, it was forced to make service cuts and increase fares. These cuts reduced the Frequent Service Network from its standard of service every 15 minutes, most of the day and seven days a week. With input and support from community stakeholders, TriMet committed to restore Frequent Service as soon as resources were available. The four lines with relatively low minority populations in their service areas have been an established part of this network since its inception, and omitting them from the service restoration would not support the goals of the Frequent Service Network.

Another point to note is that the Major Service Change definition measures the degree of *change*, which depends on the level of service prior to the changes. In this case, certain lines required adding more service hours than others to achieve 15-minute frequencies. This was more common on lines with lower-than-average minority populations because the lines with higher-than-average minority populations had better service to begin with. In fact, Frequent Service lines with higher-than-average minority populations currently provide 64% of Frequent Service on weekends³. Under the proposal, 67% of weekend Frequent Service hours would be on lines with higher-than-average minority populations.

³ Measured by revenue hours of service.

Thus, given the available data and established methodology, implementing these changes appears to benefit protected populations equitably. TriMet therefore finds no Disparate Impact or Disproportionate Burden associated with restoring Frequent Service on weekends.

Date: May 27, 2015
To: Board of Directors
From: Neil McFarlane *Neil McFarlane*
Subject: **ORDINANCE NO. 339 OF THE TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET) ADOPTING SERVICE CHANGES, UPDATING ROUTE DESIGNATIONS AND AMENDING TRIMET CODE CHAPTER 22, AND REPEALING TRIMET CODE CHAPTER 20, CHARTER RATES (SECOND READING)**

1. Issue or Purpose of Item

The purpose of Ordinance No. 339 is to request that the TriMet Board of Directors (“Board”) adopt service changes and update route designations contained in TriMet Code Chapter 22. In addition, Ordinance No. 339 includes a housekeeping repeal of TriMet Code Chapter 20, Charter Rates, to remove outdated provisions.

2. Type of Agenda Item

- Initial Contract
- Contract Modification
- Other: Ordinance

3. Reason for Board Action

The Board may adopt service changes and update TriMet Code route designations by ordinance. The TriMet Code may be amended only by adoption of an ordinance, including repeal of existing provisions.

4. Type of Action:

- Resolution
- Ordinance 1st Reading
- Ordinance 2nd Reading
- Other _____

5. Background

The approved Fiscal Year 2016 budget includes bus and rail service improvements. Restoring bus and rail frequent service seven days per week and the start up of the new Portland Milwaukie light rail line and the subsequent bus service changes associated with that have been the focus for service improvement planning in the last 18 months. With the September changes to Sunday bus frequency, all 12 frequent service bus and rail lines will have 15 minute or better frequency 7 days per week, most hours of the day.

A. Service Change Public Process:

Starting assumptions. The 2010 Final Environmental Impact Statement for the Portland-Milwaukie Light Rail Transit Project (MAX Orange Line) included assumptions about bus service changes that would accompany the new light rail service. Primarily, all bus lines that currently travel McLoughlin Boulevard into downtown Portland would instead turn around in downtown Milwaukie, and buses that currently cross the Ross Island Bridge would instead use Tilikum Crossing.

In early 2014, TriMet asked the community for feedback on those starting assumptions and received over 350 comments online, at four open houses and at over 20 community meetings.

Initial proposal. TriMet used that community feedback to develop an initial proposal which was shared with riders during the summer of 2014. The initial proposal sought to address as many of the issues that came up from feedback received as possible.

This initial proposal was distributed to more than 4,000 riders on-board in English and in Spanish, to over 22,000 email subscribers, and by direct mail to over 20,000 addresses. TriMet hosted four open houses and attended several neighborhood meetings. Over 1,400 comments were submitted, which TriMet used to refine the proposal.

Final proposal. Based on feedback gathered during the summer, TriMet shared the final proposal with riders during the fall of 2014. Small changes were made to the initial proposal in response to feedback received. This final proposal was distributed to more than 3,000 riders on-board in English and in Spanish and to over 23,000 email subscribers. TriMet hosted one open house and attended several community meetings. Over 300 comments were submitted, mostly echoing feedback from earlier outreach efforts.

Recommended Service Changes:

- Opening the Portland Milwaukie light rail line (“Orange line”) with service between Clackamas County and downtown Portland via a new bridge over the Willamette River;
- Bus service realignment and/or more frequency on 9 bus lines due to the Portland Milwaukie light rail start-up;
- Frequent service restoration on bus and rail;
- Improvements on a handful of busy lines to relieve overcrowding and improve schedule reliability; and
- Changes recommended in the Westside Service Enhancement Plan to address growth in jobs and development.

B. Title VI Transit Equity Analyses:

In accordance with Federal Transit Administration (FTA) Title VI Circular 4702.1B implementing Title VI of the Civil Rights Act, major service changes and all service changes associated with new fixed guideway capital projects must be analyzed to identify potential disproportionate impacts to minority and low-income populations.

Two Title VI service equity analyses (“Reports”) were conducted for the service changes included in Ordinance No. 339. These Reports analyzed weekend restoration of frequent service and service changes related to the MAX Orange Line startup, respectively. Other service changes included in Ordinance No. 339, namely restoration of weekday evening frequent service, did not meet the major service change thresholds requiring an equity analysis. The Reports evaluated adverse effects as well as benefits associated with the proposed service changes. To summarize the results, the Reports find no disparate impact on minority riders. The Report on the startup of the MAX Orange Line and related bus service changes identified a potential disproportionate burden on low-income populations due to proposed stop removals, leading to more detailed research and analysis by staff. This further analysis concluded that in terms of associated costs and project goals, it was not practicable to modify the service plan.

Staff presented the preliminary Reports to the Board at their February 25, 2015 and March 25, 2015 Board meetings. The Reports were submitted to the FTA Region X Civil Rights Officer, to TriMet’s Transit Equity Advisory Committee (“TEAC”) for their review and comment, and have been posted on TriMet’s website and available for public review. The Board was provided the two final Reports for adoption of Ordinance No. 339, dated March 3, 2015 and April 17, 2015, respectively, prior to the April 22, 2015 meeting.

C. Updates to TriMet Code Chapter 22:

The routing and schedule changes as proposed would be operative on September 13, 2015, and as otherwise shown in Exhibit A of Ordinance No. 339. Updates to route designations set forth in TriMet Code Chapter 22 would be as shown in Exhibit A.

D. Repeal of TriMet Code Chapter 20, Charter Rates:

Ordinance No. 339 includes a housekeeping repeal of TriMet Code Chapter 20, Charter Rates, which contains outdated legal and operative provisions relating to charter service. Federal law and Federal Transit Administration (FTA) regulations extensively restrict federally-funded operators from providing charter services, subject to very narrow exceptions. The purpose of the FTA regulations, which apply to use of federally-funded buses and vans, is to protect private charter operators from unauthorized competition from recipients of federal financial assistance. TriMet has not provided bus charter service since the early 1990s, which was pursuant to prior, superseded FTA guidance, and does not provide light rail charter service due to system operational priorities and constraints. Repeal of TriMet Code Chapter 20 as set forth in Exhibit A to Ordinance No. 339 will serve to clarify the agency’s current policies with respect to charter services.

6. Options, if any

The Board may choose to not conduct a second reading and not adopt Ordinance No. 339. This option is not recommended. These recommended service changes are necessary to open Orange Line MAX and make associated bus line improvements in September 2015. Changes are needed to maintain capacity and reliability and make investments to help advance future planned improvements.

7. **Recommendation**

The General Manager recommends that the Board conduct a second reading and adopt Ordinance No. 339 at the May 27, 2015 Board meeting.

ORDINANCE NO. 339

AN ORDINANCE OF THE TRI-COUNTY METROPOLITAN
TRANSPORTATION DISTRICT OF OREGON (TRIMET) ADOPTING
SERVICE CHANGES, UPDATING ROUTE DESIGNATIONS AND AMENDING
TRIMET CODE CHAPTER 22, AND REPEALING TRIMET CODE CHAPTER
20, CHARTER RATES

THE BOARD OF DIRECTORS OF THE TRI-COUNTY METROPOLITAN
TRANSPORTATION DISTRICT OF OREGON (TRIMET), pursuant to the authority of Oregon
Revised Statutes Chapter 267, having considered the transit equity service change analysis final
Reports, does hereby ordain and decree the following Ordinance:

Section 1 - Adoption of Service Changes

Service Changes are adopted as set forth on the attached Exhibit A, which is incorporated into
and made part of this Ordinance. In accordance with TriMet Code Section 22.05, new Schedule
Notices shall be filed for affected lines.

Section 2 - Amendment of TriMet Code Chapter 22

TriMet Code Section 22.05 is amended to make the Route Designation updates set forth on the
attached Exhibit A.

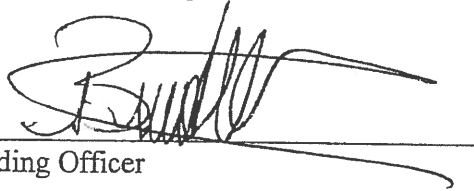
Section 3 - Repeal of TriMet Code Chapter 20, Charter Rates

TriMet Code Chapter 20, Charter Rates, is repealed in its entirety as set forth on the attached
Exhibit A.

Section 4 - Effective/Operative Dates

This Ordinance shall take effect thirty days after the date of its adoption. Operative dates for
specific Service Changes and Route Designation updates shall be as designated on Exhibit A.

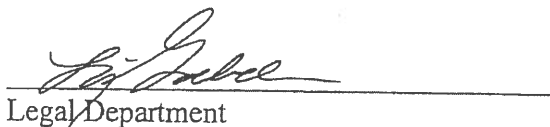
Date Adopted: May 27, 2015



Presiding Officer

Attest:
Kelley Runyon
Recording Secretary

Approved as to Legal Sufficiency:



Legal Department

**ORDINANCE NO. 339
EXHIBIT A**

I. Service Changes and TriMet Code Chapter 22 Route Designation Updates

Service Changes are adopted and TriMet Code Chapter 22 Route Designations are updated as set forth below:

Section 1 - Service Changes

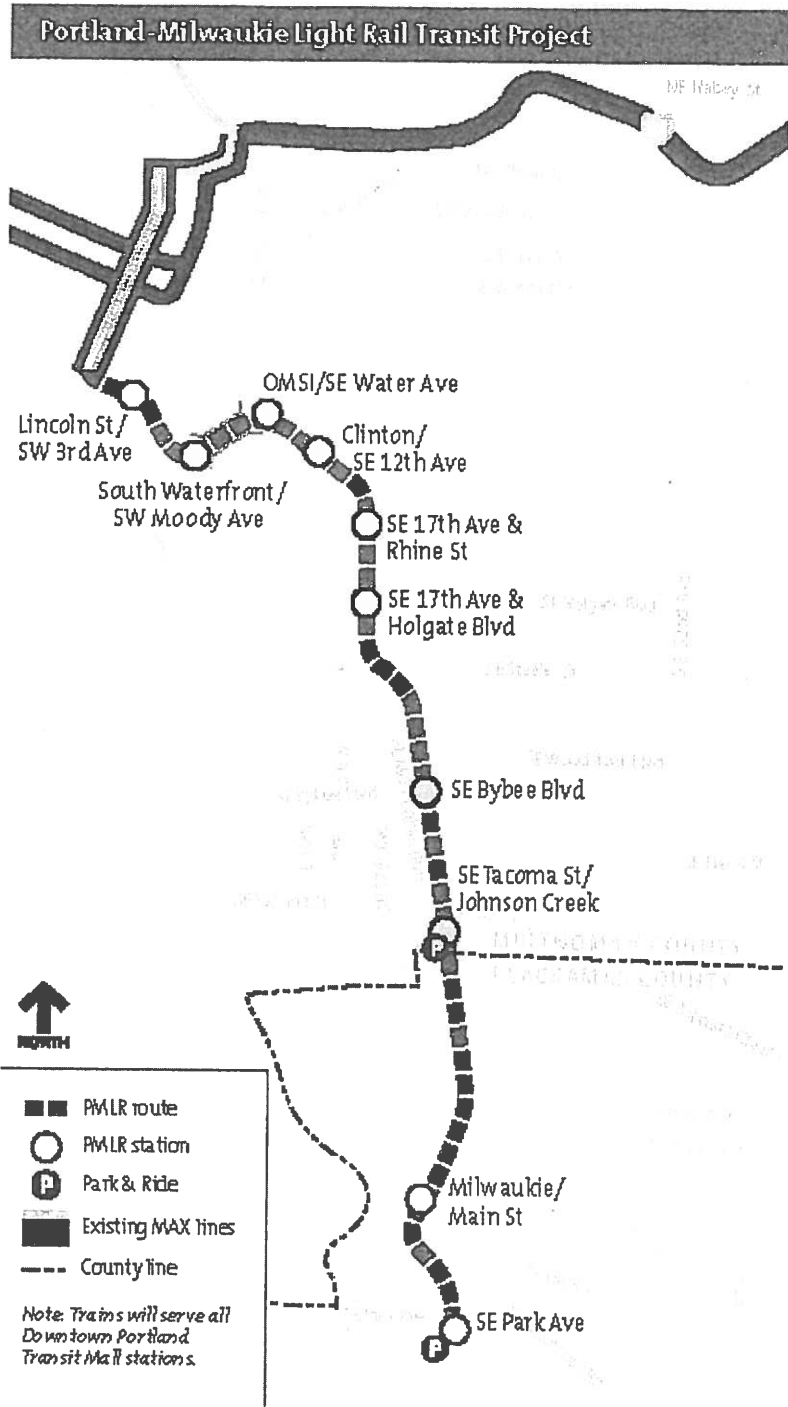
A. Service Changes (Operative on September 13, 2015)

Existing Line	Description
4-Division/Fessenden	Trips added on Sundays for 15 minute Frequent Service.
6-M L King Jr Blvd	Trips added on Sundays for 15 minute Frequent Service.
8-Jackson Park/NE 15 th Ave	Trips added on Sundays for 15 minute Frequent Service.
9-Powell Blvd	Route would be realigned to travel across the Tilikum Crossing, <i>Bridge of the People</i> , and Harbor Viaduct. Trips added during weekdays to extend Frequent Service out to Gresham. Trips added on Sundays for 15 minute Frequent Service.
12-Barbur/Sandy Blvd	Trips added on Sundays for 15 minute Frequent Service.
14-Hawthorne	Trips added on Sundays for 15 minute Frequent Service.
15-Belmont/NW 23 rd Ave	Trips added on Sundays for 15 minute Frequent Service.
17-Holgate/Broadway	Route would be realigned to travel across the Tilikum Crossing and Harbor Viaduct.
19- Woodstock/Glisan	5 trips would be added to Saturday and Sunday schedules. All trips would start and end at Flavel approximately 2 hours earlier than current.
28-Linwood*	Route would be realigned to travel along Linwood, Johnson Creek Blvd, into the Tacoma Park & Ride, Tenino, McLoughlin, Ochoco, Main into downtown Milwaukie. The route would be combined with the existing line 34-River Rd. Frequency of buses would change from about every 70 minutes to about every 35 minutes.
29-Lake/Webster Rd	Route would be realigned to travel along Washington to McLoughlin to Jackson to downtown Milwaukie.
30-Estacada	The express trip from Estacada that serves Clackamas Town Center and then turns into a 31-King Rd. express into downtown Portland will continue, but will be renamed 30E-Estacada Express. This is one trip to downtown Portland in the morning, and one trip out of downtown Portland in the afternoon.
31-King Rd*	Route would be combined with the existing line 33-McLoughlin.

	Neither route would continue north to downtown Portland. Frequency would change from about every 35 minutes weekdays and Saturdays, 60 minutes on Sundays to about every 15 minutes 7 days per week.
32-Oatfield	This route would no longer travel to downtown Portland. It would make connections to MAX Orange line at the Lake Road Station.
33-McLoughlin	Route would be combined with the existing line 31-King Rd. Neither route would continue north to downtown Portland. All trips would continue south to Clackamas Community College. This line would have trips added on Sunday to make it frequent service.
34-River Rd*	Route would be combined with the existing line 28-Linwood. Frequency of buses would change from about every 70 minutes to about every 35 minutes.
54-Beaverton Hillsdale Hwy/56-Scholls Ferry Rd	Trips added Sundays for frequent service restoration in September 2015.
57-TV Hwy/Forest Grove	Trips added Sundays for frequent service restoration in September 2015.
75-Cesar Chavez/Lombard	Trips added Sundays for frequent service restoration in September 2015.
99-McLoughlin Express	Route would be realigned to travel along McLoughlin, to downtown Milwaukie at Jackson, 21 st , Harrison, Main, Ochoco, McLoughlin, into the Tacoma Park & Ride, Tacoma, Sellwood Bridge, Macadam, Arthur, 1 st , Harrison, 6 th in downtown Portland. Outbound it would travel along 5 th to Harrison, 1 st , Kelly, Macadam, Sellwood Bridge, Tacoma, Tacoma Park & Ride, McLoughlin, Ochoco, Main, Harrison, 21 st , Jackson, McLoughlin. The route would no longer be an express route and it would serve passengers both inbound to Portland and outbound from Portland to Oregon City in both the morning and afternoon peak hours.
154-Willamette	Trips added and route extended up to Oregon City Manor.
MAX Orange Line	New light rail service between downtown Portland and Clackamas County at Park Avenue and McLoughlin Blvd. Service will run 7 days/week, about every 15 minutes. See map below
Orange Line light rail service (service after 11:30p weekdays and after 12:30a weekends to be provided by the Orange Night Bus)	New light rail service between downtown Portland and Clackamas County at Park Avenue and McLoughlin. Service would run 7 days per week, with approximately 15 minute frequency. Service late at night from downtown Portland south to Park Avenue Station would be provided by the 291-Orange Night Bus.

*Bus Line numbers 28 and 31 will be deleted. Both of these routes will be combined with other bus lines, the 28 will be combined with the 34, and the 31 will be combined with the 33.

MAX Orange Line (Portland-Milwaukie Light Rail Transit Project)



B. Service Changes (Operative as designated below)

Existing Line	Description
4-Division/Fessenden	Trips added evening hours for 15m frequent service restoration on weekdays. Service implemented December 2014. Trips added Saturdays for frequent service restoration in March 2015.
6-M L King Jr Blvd	Trips added evening hours for 15m frequent service restoration on weekdays. Service implemented December 2014. Trips added Saturdays for frequent service restoration in March 2015.
8-Jackson Park/NE 15 th Ave	Trips added evening hours for 15m frequent service restoration on weekdays. Service implemented December 2014. Trips added Saturdays for frequent service restoration in March.
9-Powell Blvd	Trips added evening hours for 15m frequent service restoration on weekdays. Service implemented December 2014. Trips added Saturdays for frequent service restoration in March 2015.
12-Barbur/Sandy Blvd	Trips added evening hours for 15m frequent service restoration on weekdays. Service implemented December 2014. Trips added Saturdays for frequent service restoration in March 2015.
14-Hawthorne	Trips added evening hours for 15m frequent service restoration on weekdays. Service implemented December 2014. Trips added Saturdays for frequent service restoration in March 2015.
15-Belmont/NW 23 rd Ave	Trips added evening hours for 15m frequent service restoration on weekdays. Service implemented December 2014. Trips added Saturdays for frequent service restoration in March 2015.
33-McLoughlin	Trips added evening hours for 15m frequent service restoration on weekdays. Service implemented December 2014. Trips added Saturdays for frequent service restoration in March 2015.
54-Beaverton Hillsdale Hwy/56-Scholls Ferry Rd	Trips added evening hours for 15m frequent service restoration on weekdays. Service implemented December 2014. Trips added Saturdays for frequent service restoration in March 2015.
57-TV Hwy/Forest Grove	Trips added evening hours for 15m frequent service restoration on weekdays. Service implemented December 2014. Trips added Saturdays for frequent service restoration in March 2015
72-82 nd Avenue	Trips added evening hours for 15m frequent service restoration on weekdays.
75-Cesar Chavez/Lombard	Trips added evening hours for 15m frequent service restoration on weekdays. Service implemented December 2014. Trips added Saturdays for frequent service restoration in March 2015.

Section 2 -Route Designation Revisions to TriMet Code Chapter 22, Section 22.05 (Operative on September 13, 2015)

Revise “33-McLoughlin to 33- McLoughlin/King Rd”

Revise “34 -River Rd to 34-Linwood/River Rd”

Delete “28-Linwood”

Delete “31-King Rd”

Revise “154- Willamette to 154- Willamette/Clackamas Heights”

Revise “99 McLoughlin Express to 99-Macadam/McLoughlin”

Add – “MAX Orange Line”

Add – “291- Orange Night Bus”

II. Repeal of TriMet Code Chapter 20, Charter Rates

TriMet Code Chapter 20, Charter Rates, is deleted in its entirety as set forth below:

CHAPTER 20 – CHARTER RATES

~~20.05 **Charter Service.** Charter service shall be incidental to, and shall not interfere with, regularly scheduled mass transportation service and shall be in compliance with applicable state and federal law and regulations.~~

~~20.10 **Light Rail Charter Rates.** Light Rail Vehicle Charter Rates shall be as follows:~~

~~\$148 per hour for one-car train~~

~~\$237 per hour for two-car train~~

~~\$40 cleaning fee per car if food or drink is consumed on board, or if extensive decorations are involved~~

~~\$200 minimum charge~~

~~(20.10 amended by Ordinance No. 173)~~

~~20.15 **Bus Charter Rates.** Regular bus charter rates shall be as follows:~~

~~\$81 per hour~~

~~\$135 minimum charge~~

~~(20.15 amended by Ordinance No. 173)~~

~~20.20 **Charter Service Policy.** The following Statement of TriMet Charter Service Policy is hereby adopted to comply with the Charter Regulations of the Urban Mass Transportation Administration, 49 CFR, Part 604 (1982):~~

~~A. TriMet shall provide charter service for the people of the TriMet District only as authorized by state and federal law and regulation.~~

~~B. TriMet shall not provide charter service outside the TriMet District.~~

~~C. TriMet's primary function is to provide regularly scheduled mass transportation service. Charter service shall be incidental to the mass transportation service and shall be provided only during times of the day when vehicles are not needed for regularly scheduled service during peak hours, or where the charter is used for less than a total of six (6) hours in any one weekday.~~

~~D. TriMet charter service shall be considered supplementary to that of private bus operators for meeting the charter service needs of the District.~~

~~E. In establishing rates for charter service, TriMet shall comply with federal regulations for charter service. The rates shall be reviewed annually. The annual revenues generated by charter bus operations shall equal or exceed the annual cost of providing charter bus operations.~~

~~F. This statement of charter policy supersedes all prior charter policy statements.~~

Ordinance 339 Adopting Service Changes, Updating Route Designations and Amending TriMet Code Chapter 22, and Repealing TriMet Code Chapter 20, Charter Rates (First Reading)

General Counsel Shelley Devine read Ordinance 339 by title only – no action is necessary.

Neil McFarlane introduced Ordinance 339 and shared the major service changes proposed in conjunction with the opening of the Portland Milwaukie light rail line (Orange Line) with service between Clackamas County and downtown Portland via a new bridge over the Willamette River. At the March meeting, the conclusions of the Equity Analysis for the proposed service changes were presented to the Board. That report was also submitted to the FTA and we have not received any comments from the FTA.


President Warner stated that written comments on Ordinance 339 that have been received online and through the mail have been shared with the Board and comment cards completed today will be forwarded to all Board members and will become part of the formal Public Hearing record. If the Board is comfortable with the conclusions of the Equity Analysis, we will proceed to the public hearing on Ordinance 339.

No one spoke to the Board regarding Ordinance 339.

6. Other Business & Adjournment

There was no other business to come before the Board -- President Warner adjourned the meeting at 11:06 a.m.

Respectfully submitted,



Kelly Rannion, Recording Secretary

President Warner stated that the Board has seen the extensive community outreach that has been done, heard from community members, considered the Transit Equity Analysis, and is aware of the policy direction this Board has wanted to move forward, and asked for discussion on Ordinance 338.

Director Prosser stated there is never a good time to raise fares because there will always be legitimate concerns about raising fares for the most vulnerable part of our community. While it may look like we have a healthy bottom line, this is a critical time to build a fare structure that is equitable and sustainable over the long-term to provide and expand the service that is so needed and asked for throughout the region. Director Prosser stated that he is confident in the existing and the expanded mitigation that would assist the people who are most impacted and would allow us to move forward with providing and expanding the much needed service.

Director Stovall asked for clarification on Table 3 of the Transit Equity Analysis, community engagement, and the mitigation program.

Director Esmonde asked how many organizations are participating in the mitigation program – Johnell Bell responded over 85 and explained the outreach process.

President Warner stated that he agrees with Director Prosser that we need to look at the long-term and be very deliberate in our fare policies and maximize service while minimizing adverse impact. President Warner stated the importance of a broader community conversation in a holistic manner to balance increasing service with an equitable fare policy.

Director Stovall stated his concern that the Transit Equity Advisory Committee did not officially weigh in on this Ordinance and stated the importance of advisory committees to the Board vetting these important issues.

Action: Joe Esmonde moved approval of Ordinance 338; Travis Stovall seconded the motion.

The following roll call vote resulted in the approval of Ordinance 338:

Joe Esmonde.....	Yes
Shelley Martin.....	Abstained
T. Allen Bethel.....	Yes
Bruce Warner.....	Yes
Lori Irish Bauman.....	Abstained
Travis Stovall.....	Yes
Craig Prosser.....	Yes

Ordinance 339 Adopting Service Changes, Updating Route Designations and Amending TriMet Code Chapter 22, and Repealing TriMet Code Chapter 20, Charter Rates (Second Reading)

General Counsel Shelley Devine read Ordinance 339 by title only.

Neil McFarlane summarized the major service changes and explained the housekeeping change that would remove the provisions that dealt with charter rates because Federal rules do not allow us to provide charter service.

President Warner stated that the Board is aware of the extensive community outreach that has been done, considered the Transit Equity Analysis for Ordinance 339, and asked for discussion on Ordinance 339.

There was no Board discussion on Ordinance 339.

Action: Travis Stovall moved approval of Ordinance 339; T. Allen Bethel seconded the motion.

The following roll call vote resulted in the approval of Ordinance 339:

Craig Prosser.....	Yes
Travis Stovall.....	Yes
Lori Irish Bauman.....	Abstained
Bruce Warner.....	Yes
T. Allen Bethel.....	Yes
Shelley Martin.....	Abstained
Joe Esmonde.....	Yes

6. Other Business & Adjournment

Neil McFarlane addressed Joe Esmonde's concern about the timing of creating an internal team to recommend best technology for the Pedestrian Collision Warning system by Fall of 2016. Mr. McFarlane stated that while we do need to consider all we have on our plate right now with the Orange Line opening and emerging technologies, we agree that this technology is essential to our layer of safety for the overall system, so we will come back to the Board with a revised schedule and program to show the timing and pacing that would consider that.

President Warner adjourned the meeting at 12:38 p.m.

Respectfully submitted,



Kelly Rynnion, Recording Secretary

Attachment K

MAX ORANGE LINE STARTUP EQUITY ANALYSIS, WITH
DOCUMENTATION OF BOARD APPROVAL



Equity Analysis: Orange Line MAX Startup & Bus Service Plan

Department of Diversity & Transit Equity

April 17, 2015

Executive Summary: PMLR Startup & Bus Service Plan Equity Analysis

In accordance with Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B, TriMet conducts an equity analysis any time major service changes are proposed in order to ensure that changes do not unfairly impact people of color and low-income populations. This analysis follows up on the already-conducted Environmental Impact Statement, which includes an Environmental Justice Analysis of impacts to minority and low-income populations in the corridor, by examining the detailed service proposal for any potential disproportionate impacts on the basis of race, color, national origin, or income level. The launch of the new MAX Orange Line and the proposed realignment of bus service in the Orange Line corridor call for such an analysis prior to the Board taking action on service decisions.

Methodology

TriMet's Title VI Program outlines the agency's Disparate Impact and Disproportionate Burden policies, as well as the way in which TriMet conducts equity analyses. In the case of the service changes proposed with the launch of the Orange Line, staff aimed to answer the following two questions:

1. Given the projected improved travel times and increased bus service in the corridor, do minority and low-income populations stand to benefit equitably as compared to non-minority and higher income populations?
2. Do any service changes with potential adverse effects occur in areas of high concentrations of minority and/or low-income populations?

Data from the US Census Bureau's American Community Survey was used to conduct the analysis.

Findings

Disparate Impact Analysis (Minority Population)

The Orange Line corridor has a below-average minority population relative to the TriMet district. Areas where duplicative service is proposed to be removed are also below-average minority population, therefore leading to a finding of *no Disparate Impact* related to service reductions.

At the same time, the demographics of the corridor also mean that proposed service improvements stand to benefit an above-average non-minority population. Given considerations like the prior Environmental Justice Analysis, the agency's commitment to retain the bus service hours currently provided in the corridor, and project goals relating to supporting Orange Line operation, this does not prompt TriMet to modify the proposal.

Disproportionate Burden Analysis (Low-income Population)

The Orange Line corridor has an above-average low-income population relative to the TriMet district. This implies that the travel time improvements and bus service increases have the potential to benefit low-income populations at least as much as (or even more than) higher income populations.

However, some bus stops where otherwise duplicative service is proposed to be removed are in areas with above-average low income populations, leading to a finding of *potential Disproportionate Burden*. Many of these

stops have nearby alternative service or very little ridership, but the stop pair located at Harold & McLoughlin in the Westmoreland neighborhood, which currently has frequent service from the Line 33-McLoughlin, does not have equivalent alternative service within an acceptable distance per TriMet's adopted Title VI policies.

Alternatives to Address Findings

Per FTA, identification of a Disproportionate Burden calls for TriMet to "avoid, minimize, or mitigate impacts where practicable." TriMet leadership has considered the following three options as potential alternatives in response to the findings of the equity analysis:

Option 1: Minimize

Provide bus service connecting Harold & McLoughlin to the MAX Orange Line. While this could not feasibly be the level of service currently provided to the identified stops, it would avoid discontinuing service to the stops altogether.

Option2 : Mitigate

Review the Line 19-Woodstock/Glisan (which stops 1/3 mi from Harold & McLoughlin) for increased service. The Line 19 travels to downtown Portland and boosting its frequency could help address the loss of frequent service to Harold & McLoughlin.

Option 3: Take no additional action

Move forward as planned, providing a justification for why avoiding, minimizing, or mitigating for the Disproportionate Burden is not practicable, per FTA guidelines.

Agency Decision

TriMet has selected Option 3 above as the most feasible option. This decision is based on the following reasons:

- The balance of benefits to populations with low incomes across many MAX stations and bus stop compared to the negative impacts to the populations near one bus stop is overall positive.
- Other options carry large on-going operations costs, taking operating resources away from other services that could serve larger populations.
- The bus stop pair of most concern has comparatively low ridership.

Thus, the service plan as provided is proposed to be adopted by the TriMet Board.

I. Background

TriMet will be opening its fifth MAX light rail line, the Orange Line, on September 12, 2015. Associated with the opening of the Orange Line are proposed service changes to most bus routes in the corridor, which have previously been discussed with the public through a series of National Environmental Policy Act documents and public conversations over the last 17 years. Specifically, in 1998 the Portland region examined transit service alternatives in *the South/North Draft Environmental Impact Statement* and selected light rail as the locally preferred alternative. In 2002, the region again examined light rail, busway and bus rapid transit alternatives from Portland to Milwaukie through a *South Corridor Draft Environmental Impact Statement (SDEIS)* and subsequently chose light rail to be the preferred alternative between Portland and Milwaukie.

In 2008, the region examined service options that explored how far south light rail would extend in Milwaukie and the exact Willamette River crossing through the *South Corridor Supplemental Draft Environmental Impact Statement (SDEIS)*. This document described potential adjustments to the transit service for light rail and bus service including transit lines 4, 9, 17, 19, 31, 32, 33, 34, 41, 70, 75 and 99. These changes presented in 2008 are very similar to the service changes proposed in 2015.

The *PMLRT Final Environmental Impact Statement (FEIS)* was published in October 2010 after significant public review and discussion. The transit service (alignments and potential bus service changes) were subject to an Environmental Justice analysis. Further, the service frequency and span of service for light rail was included in the Full Funding Grant Agreement with the Federal Transit Administration and therefore becomes a requirement that TriMet provides this level of service. A map of the proposed service changes from the FEIS is included in appendix A.

In addition to the Environmental Justice analysis already conducted, TriMet must ensure that all service changes – both increases and reductions – comply with Title VI of the Civil Rights Act of 1964, which states:

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

The FTA has provided specific implementing guidelines and regulations for complying with Title VI in Circular 4702.1B (“Circular”). Due to the interrelated nature of race/ethnicity and income, the Circular instructs transit agencies to consider impacts on low-income populations as well as minority populations; the assessment of potential Title VI issues related to Major Service Changes is completed through a service equity analysis. Figure 1 below shows the sequence of steps and considerations in the equity analysis process.

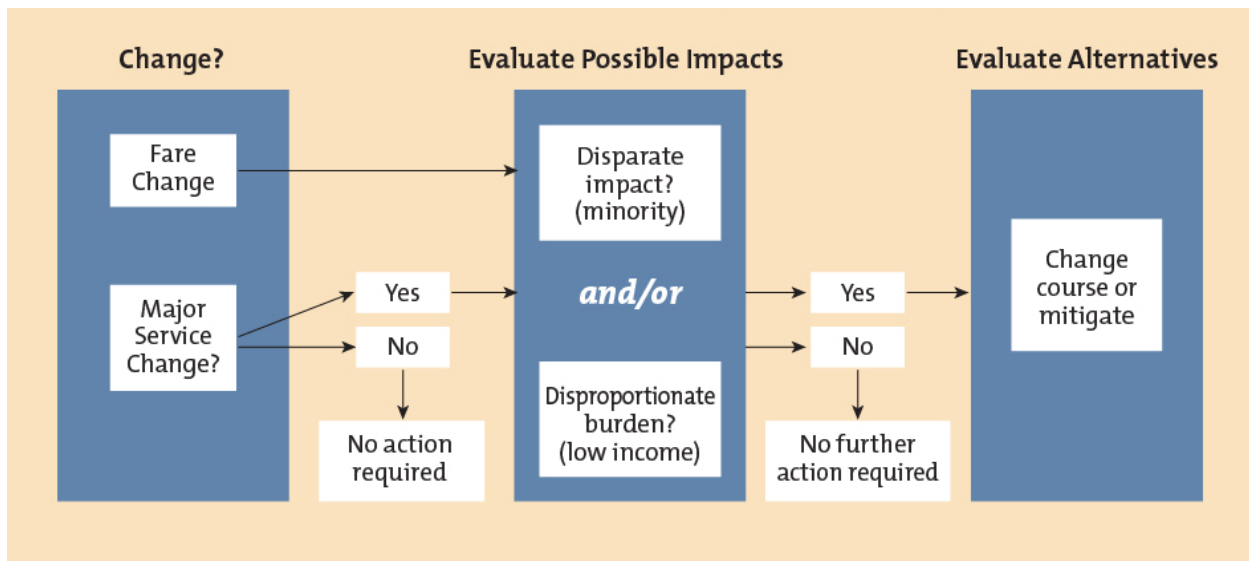


Figure 1: Overview of Title VI Equity Analysis

II. TriMet Title VI Compliance

In the fall of 2013, TriMet updated its Title VI Program, which received concurrence by the FTA in January 2014. The program outlines agency policies, definitions and procedures for complying with Title VI and performing equity analyses. This includes the agency’s Major Service Change, Disparate Impact, and Disproportionate Burden policies.

A. Major Service Change Policy

All changes in service meeting the definition of “Major Service Change” are subject to a Title VI Equity Analysis prior to Board approval of the service change. A Title VI Equity Analysis will be completed for all Major Service Changes and will be presented to the 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 as defined in the Introduction of TriMet’s Title VI Program.
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.

B. Disparate Impact Policy

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

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.

For lines with Major Service Changes, if the percentage of minority population in block groups¹ served by the impacted portion of the line (sum of minority population in all impacted block groups divided by the

¹ TriMet’s 2013 Title VI Program states that the geographic unit of measurement will be tracts, but FTA C 4702.1B instructs transit agencies to evaluate impacts at the block or block group level.

total population in all impacted block groups) exceeds the percentage of minority population in the TriMet District as a whole, the impacts of changes to the line will be considered disparate.

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 (sum of minority population in all impacted block groups divided by the minority population of the TriMet District as a whole) is compared to the percentage of impacted non-minority population (sum of non-minority population in all impacted block groups divided by the non-minority population of the TriMet District as a whole). Comparisons of impacts between minority and non-minority 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.

C. Disproportionate Burden Policy

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

III. Proposed Service Changes for September 2015

A. Overview of Changes and Corridor Demographics

TriMet’s newest addition to the MAX light rail network, the Orange Line, will improve transportation options in the corridor between downtown Portland and Milwaukie. Proposed changes would also affect service south of Milwaukie, as the proposal includes modifying bus service between Oregon City and Milwaukie.

Currently 22 bus lines serve the corridor along the Orange Line and south to Oregon City, most of which are not proposed for any changes in routing or service. Nine others, however, are proposed to be reconfigured in order to align with the new light rail service. Proposed changes include re-routing lines, shortening routes that previously traveled to downtown Portland, increasing frequency and hours of service, and adding new service where none previously existed. Table 1 provides a summary of the types of service changes proposed by line and maps depicting service before and after the changes are shown in Figure 2.

Table 1: Summary of proposed September 2015 service changes

Line	Routing Changes	Frequency Improvements	Span (Hours of Service) Improvements	New Service or Service Pattern
9-Powell Blvd	✓			
17-Holgate/Broadway	✓			
19-Woodstock/Glisan			✓*	
28-Linwood	✓	✓	✓	
31-King Rd	✓	✓	✓	
32-Oatfield	✓			
33-McLoughlin	✓			
34-River Rd	✓	✓		
99-McLoughlin Express	✓			✓
MAX Orange Line				✓

**Saturday & Sunday only*

Figures 3 and 4 show the proposed changes overlaid on above-average concentrations of minority and low-income populations, respectively. Demographically, the corridor is less diverse in terms of race/ethnicity than the TriMet district as a whole: the population includes 16% people of color, compared to 27% for the district. The low-income population is slightly above that of the TriMet district, at 23% of the population at or below 150% federal poverty; the TriMet district has a 22% low-income population.

Consistent with a promise made to riders, the proposal does not remove bus service hours from the corridor. Instead, all savings due to route changes are reinvested in the area under the proposal package.

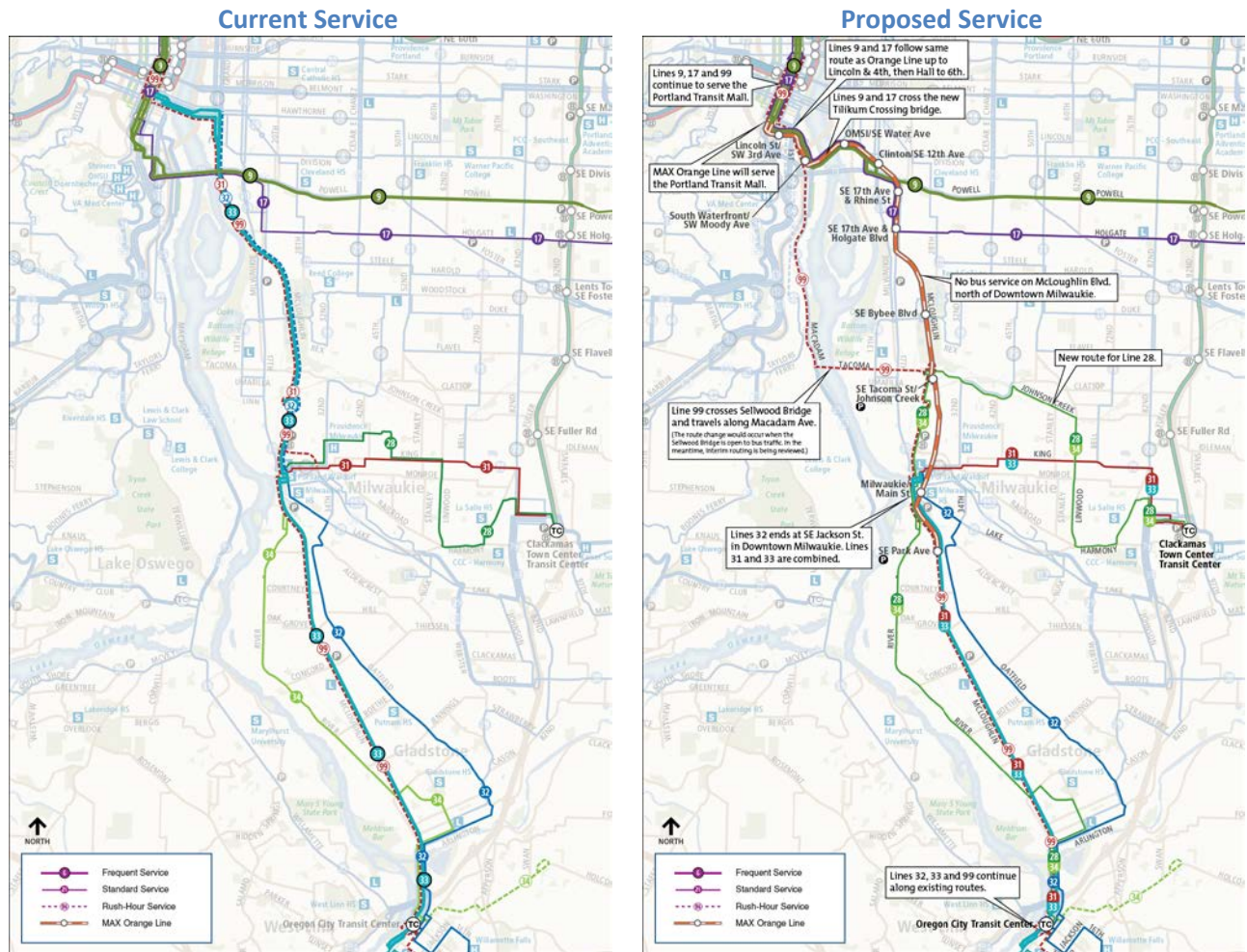


Figure 2: Maps of current and proposed transit service in the MAX Orange Line corridor

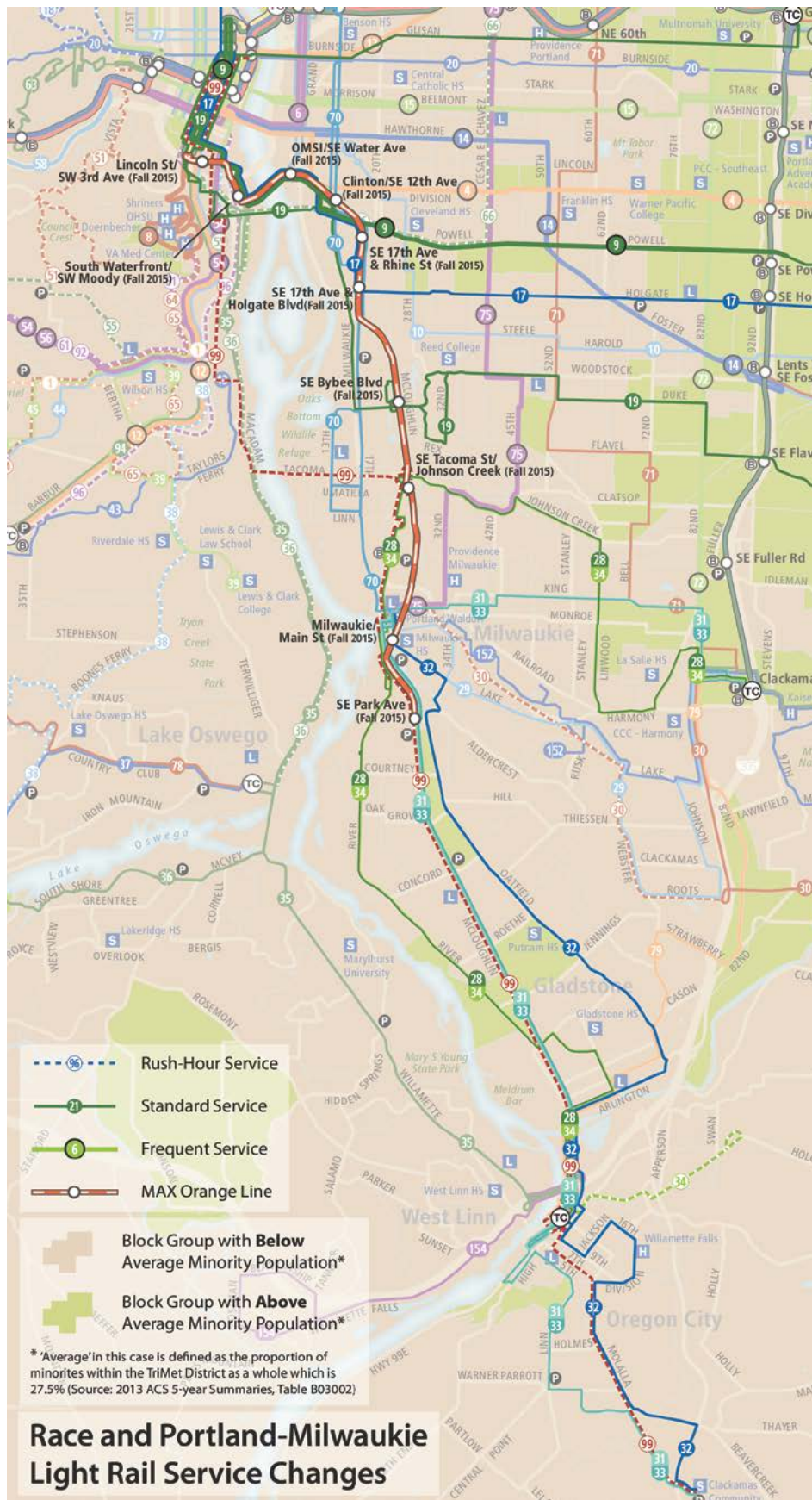


Figure 3: Proposed Service Changes and Minority Population



Figure 4: Proposed Service Changes and Low-income Population

B. Service Change Details

Because the package of service changes are associated with a new fixed guideway project, the FTA Circular requires TriMet to evaluate all changes for potential disproportionate impacts, and not just those meeting the agency's Major Service Change threshold. The Circular further instructs that the analysis compare service levels before and after implementation of changes.

Number of daily trips² is used to measure the change in revenue hours of service; results are shown in Table 2, with estimated percentage change and nature of that change by line (whether frequency, span, new service pattern, or new line). All changes shown indicate an increase in service compared to the present.

Table 2: Estimated change in service hours by line

Line	Current Daily Trips	Est. Daily Trips under Proposal	Est. Change in Daily Revenue Hours (%)	Type of Change
19-Woodstock/Glisan SATURDAY	54	54*	+13%	Span
19-Woodstock/Glisan SUNDAY	36	36*	+14%	Span
28-Linwood	54	88	+63%	Frequency, Span
31-King Rd WEEKDAY	71	131	+85%	Frequency
31-King Rd SATURDAY	42	108	+157%	Frequency
31-King Rd SUNDAY	22	108	+391%	Frequency
34-River Rd	32	88	+175%	Frequency
99-McLoughlin Express	19	38	+100%	New Service Pattern
MAX Orange Line WEEKDAY	0	146	New line	New Line
MAX Orange Line SATURDAY	0	119	New line	New Line
MAX Orange Line SUNDAY	0	111	New line	New Line

**Although the number of trips will remain the same on the Line 19, five trips will serve a segment of the route beginning two hours earlier than it currently serves.*

Table 3 shows proposed routing changes. The Line 9-Powell Blvd and Line 17-Holgate/Broadway have minor changes due to being re-routed across the new Tilikum Crossing bridge. The Line 32-Oatfield is proposed to be reduced in length so that it no longer travels between Milwaukie and downtown Portland. The Line 31-King Rd and Line 33-McLoughlin are proposed to no longer operate between Milwaukie and downtown Portland, and will be operated as a single line with connections to Orange Line in Milwaukie, and the Line 28 and Line 34 are also proposed to be combined, thereby increasing both route lengths.

² A trip is defined as a complete journey by the vehicle from one end of the route to the other.

Table 3: Change in Route Length by Line

Line	Est. Change in Route Miles (Number)	Est. Change in Route Miles (%)
9-Powell Blvd	-0.1	-1%
17-Holgate/Broadway	+0.1	+1%
19-Woodstock/Glisan	0.0	0%
28-Linwood	+11.5	+180%
31-King Rd*	-7.6	-61%
	+3.9	+31%
32-Oatfield	-7.3	-35%
33-McLoughlin*	-8.3	-42%
	+4.5	+23%
34-River Rd	+6.7	+60%
99-McLoughlin Express	+1.2	+7% New Service Pattern
MAX Orange Line	+7.3	New Line

IV. Equity Analysis

A. Line-level Analysis

Following the Title VI policies described previously, the line-level analysis examines how proposed changes might impact minority and low-income populations, for each line proposed for service changes. This considers both positive impacts (i.e. benefits including increases in frequency and service hours) and negative impacts (i.e. adverse effects including service reductions and/or removal of stops).

MAX Orange Line

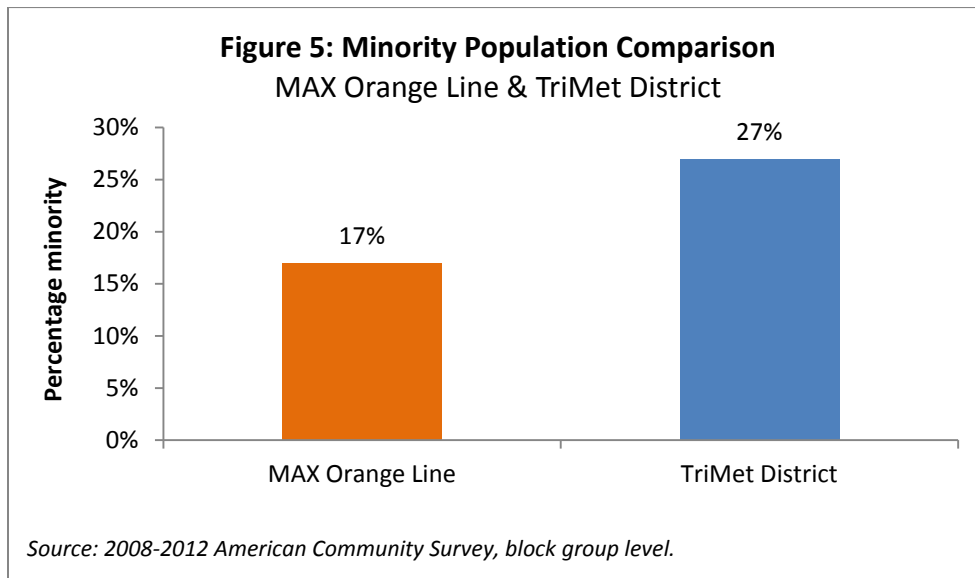
Service Change Description

The most substantial service change occurring in September 2015 is the opening of the MAX Orange Line between Downtown Portland and Downtown Milwaukie. Service on the Orange Line will operate between approximately 4:30am and 1:30am daily³. Trains will arrive every 15 minutes most of the day, and every 10 minutes on average during weekday rush hours.

³ Due to the rail maintenance-of-way window of opportunity, trains will operate until 11:30pm, followed by bus service that will replicate the Orange Line.

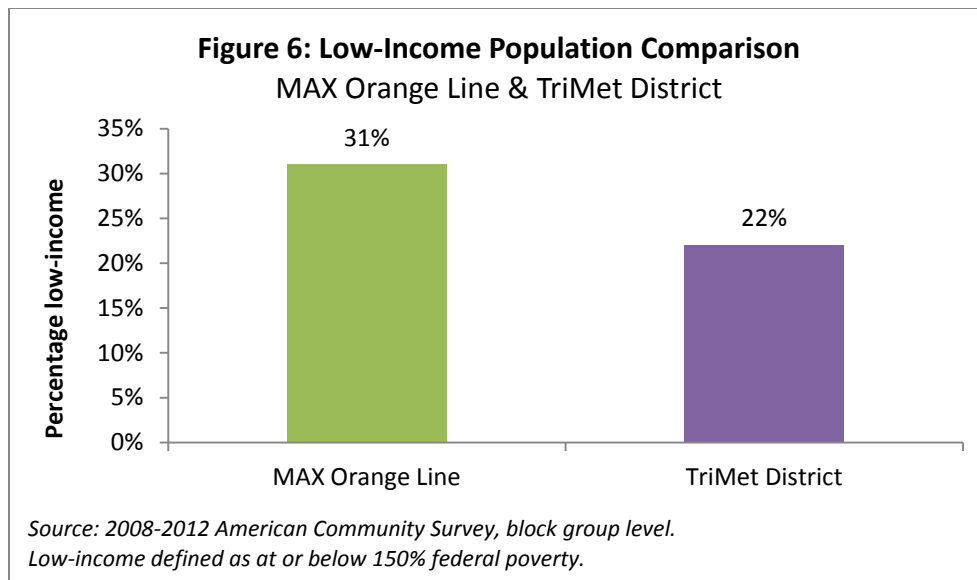
Disparate Impact Analysis

As a new service, this analysis examines the change through the lens of distribution of benefits. Figure 5 compares the minority population along the Orange Line with the minority population of the TriMet service district as a whole. As shown, the minority is lower in the block groups located around Orange Line stops (17%) than the district average (27%). On its own, this could indicate a potential disparate impact since the benefits of the new service accrue to a disproportionately high non-minority population, but should be considered along with the rest of the analysis, including associated service changes occurring along with the opening of the Orange Line.



Disproportionate Burden Analysis

Figure 6 compares the low-income population along the Orange Line with the low-income population of the TriMet service district as a whole. As shown, the low-income population is higher in block groups surrounding Orange Line stops (31%) than the district average (22%). On its own, this could indicate no potential disproportionate burden, but should be considered along with the rest of the analysis, including associated changes occurring along with the opening of the Orange Line.



Line 19-Woodstock/Glisan

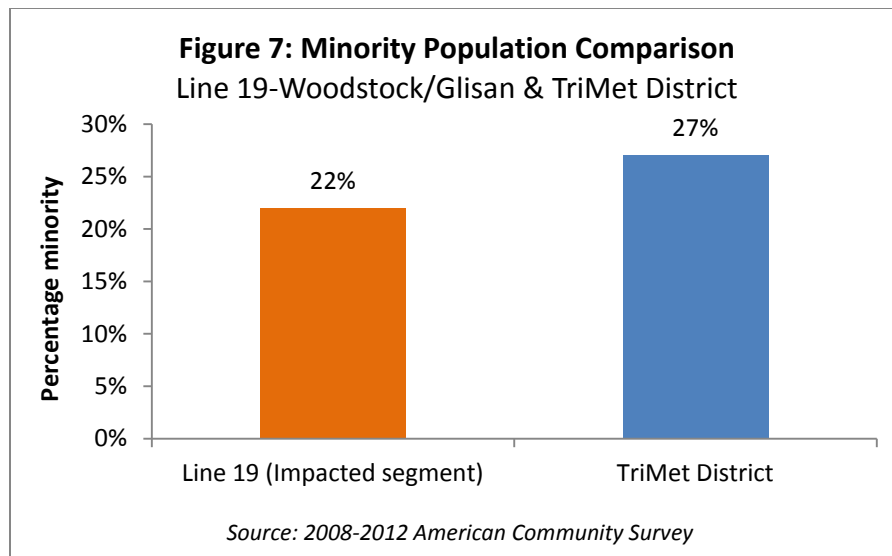
Service Change Description

It is proposed that the Line 19 begin running the full length of the route approximately two hours earlier on Saturdays and Sundays. Currently trips between downtown Portland and SE 112th & Mt. Scott Blvd begin around 10:00am; the proposal would begin these trips in both directions around 8:00am.

As an increase in service, the line-level analysis examines the change through the lens of distribution of benefits.

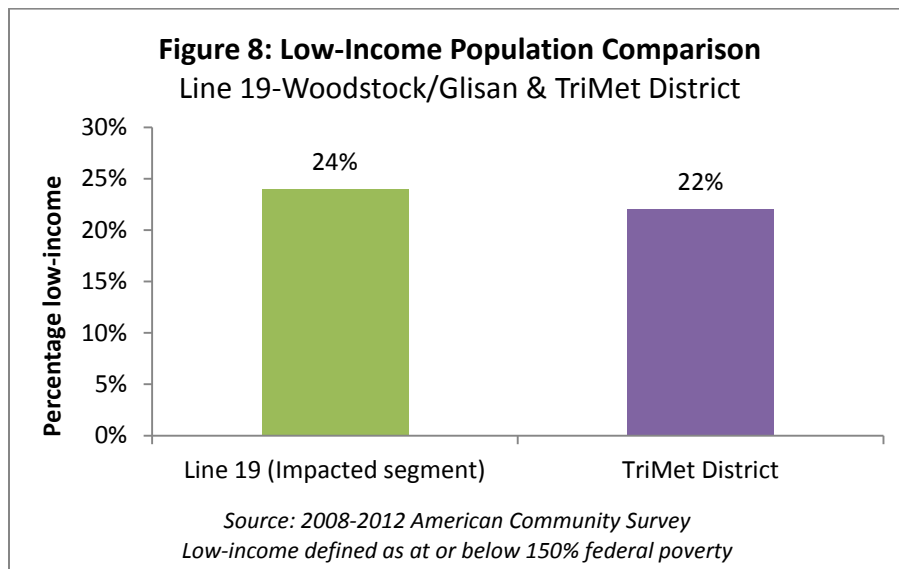
Disparate Impact Analysis

Figure 7 compares the minority population along the impacted segment of the Line 19 with the minority population of the TriMet service district as a whole. As shown, the minority population is lower along the Line 19 than the district average. On its own this could indicate a potential disparate impact, but should be considered along with the rest of the analysis.



Disproportionate Burden Analysis

Figure 8 compares the low-income population along the impacted segment of the Line 19 with the low-income population of the TriMet service district as a whole. As shown, the low-income population is higher along the Line 19 than the district average. On its own this could indicate no potential disproportionate burden, but should be considered along with the rest of the analysis.



Line 28-Linwood

Service Change Description

It is proposed that the Line 28:

- Be re-routed into Downtown Milwaukie;
- Be combined with Line 34-River Rd;
- Double in frequency (from service every 70 min to every 35 min); and

- Operate 1 ½ hours later in the evenings.

While most changes increase the level of service provided, the re-routing does eliminate service to several stops. Thus, both adverse effects and potential benefits are evaluated in the analysis.

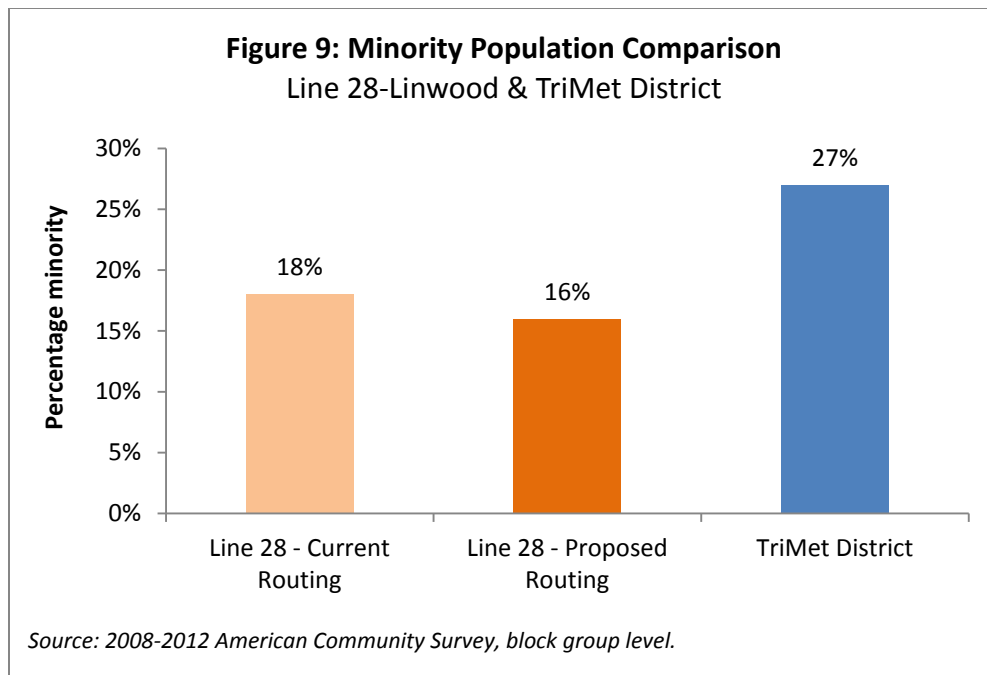
The proposed route changes to the Line 28 would remove Line 28 service from a total of 39 stops (including stops in both directions). As Table 4 shows, 27 of these stops have alternative service with similar frequency and span within ¼ mile, which means their service removal does not qualify as an adverse effect under TriMet’s Title VI policies. The remaining 12 stops have alternative service between ¼ and ½ mile away, thereby meeting the adverse effect definition. These 12 stops see little activity, with 14 total ons/offers on a typical weekday at all 12 stops combined.

Disparate Impact Analysis

Table 4 indicates that the Line 28 stops being removed and meeting the adverse effect criteria are in block groups with minority populations that are lower than average for the TriMet district (16% vs. 27%). Thus, the adverse effects associated with the Line 28 route changes are both minimal impact (few ons/offers) and do not result in Disparate Impacts on minority populations.

Table 4: Stops and populations impacted by routing changes to Line 28-Linwood				
	No. of Stops	Total daily ons/offers (weekdays)	Pct. Population Minority	Pct. Population Low-Income
Service Removed	39	44	14%	24%
<i>Nearest alternative service w/ similar span & frequency</i>				
Less than ¼ mile to bus or less than ½ mile to rail	27	30	14%	24%
Over ¼ mile to bus or over ½ mile to rail*	12	14	16%	24%
<i>*Adverse effect applies</i>				

To analyze the beneficiaries of increased service, Figure 9 compares the minority population along the Line 28 (entire route, current and proposed) with the minority population of the TriMet service district as a whole. As shown, the minority population along the current Line 28 (18%) and the proposed new route (16%) are both lower than the district average (27%). While the minority *percentage* is lower along the proposed as compared to the current routing, the actual *number* of minority persons served would increase by nearly 500.

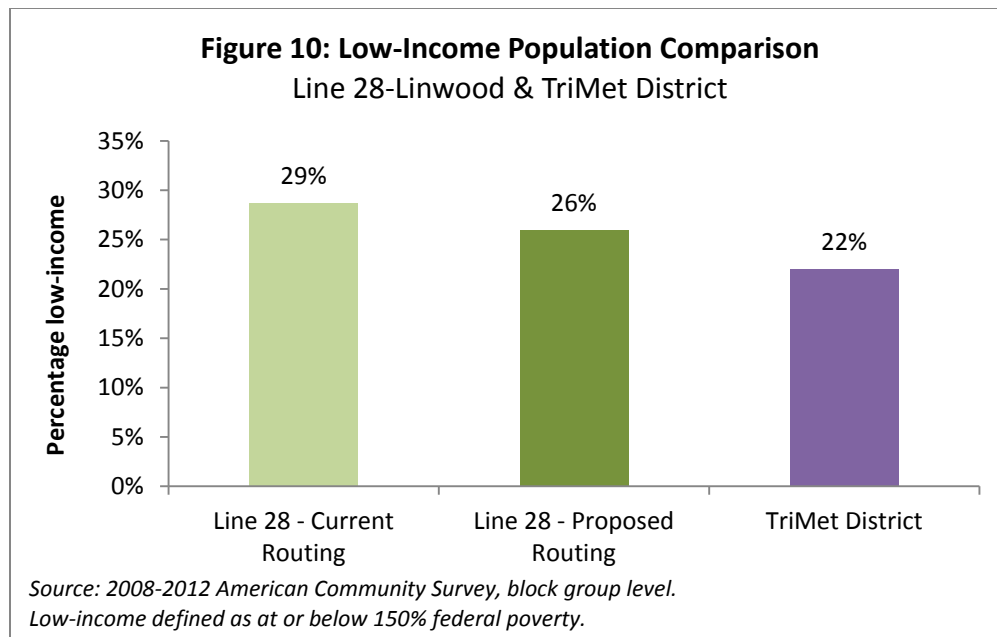


- Taken together, proposed changes to the Line 28-Linwood do not result in disproportionate adverse effects on minority populations, but the service increase benefits an above-average non-minority population.

Disproportionate Burden Analysis

Table 4 shows that the Line 28 stops being removed and meeting the adverse effect criteria are in block groups with low-income populations that are higher than average for the TriMet district (24% vs. 22%). This indicates that the adverse effects associated with the Line 28 route changes, while small, may result in a Disproportionate Burden on low-income populations.

To analyze the beneficiaries of increased service, Figure 10 compares the low-income population along the Line 28 with the low-income population of the TriMet service district as a whole. As shown, the low-income population is higher along the Line 28 than the district average, for both the current and proposed routings. And, while the *percentage* of low-income persons served is lower for the proposed as compared to the current routing, the actual *number* of low-income persons served would increase by over 700.



- Taken together, proposed changes to the Line 28-Linwood could result in and disproportionate adverse effects on low-income populations, but the service increase benefits an above-average low-income population.

Line 31-King Rd.

Service Change Description

It is proposed that the Line 31:

- Maintain its existing route between Clackamas Town Center and Downtown Milwaukie, then combine with Line 33 along McLoughlin Boulevard between Milwaukie and Oregon City;
- Increase frequency to match most Line 33 service; and
- Increase hours of service to match most Line 33 service.

Line 33 is part of the frequent service bus network. Currently the Line 31 provides service between Downtown Milwaukie and Downtown Portland during peak hours – this service would be discontinued, with the MAX Orange Line providing frequent service in its place. While most changes increase the level of service provided, the eliminated segment calls for evaluation of both adverse effects and potential benefits.

The proposed route changes to the Line 31 would remove Line 31 service from a total of 32 stops (including stops in both directions). As Table 5 shows, 30 of these stops have alternative bus service within ¼ mile or rail service within ½ mile, which means their service removal does not qualify as an adverse effect under TriMet’s Title VI policies. The remaining 2 stops are over ¼ mile from similar bus service and over ½ mile from the nearest Orange Line station, thereby meeting the adverse effect definition. These 2 stops see little activity, with 5 total ons/offers on a typical weekday at both stops together.

Table 5: Stops and populations impacted by routing changes to Line 31-King Rd.

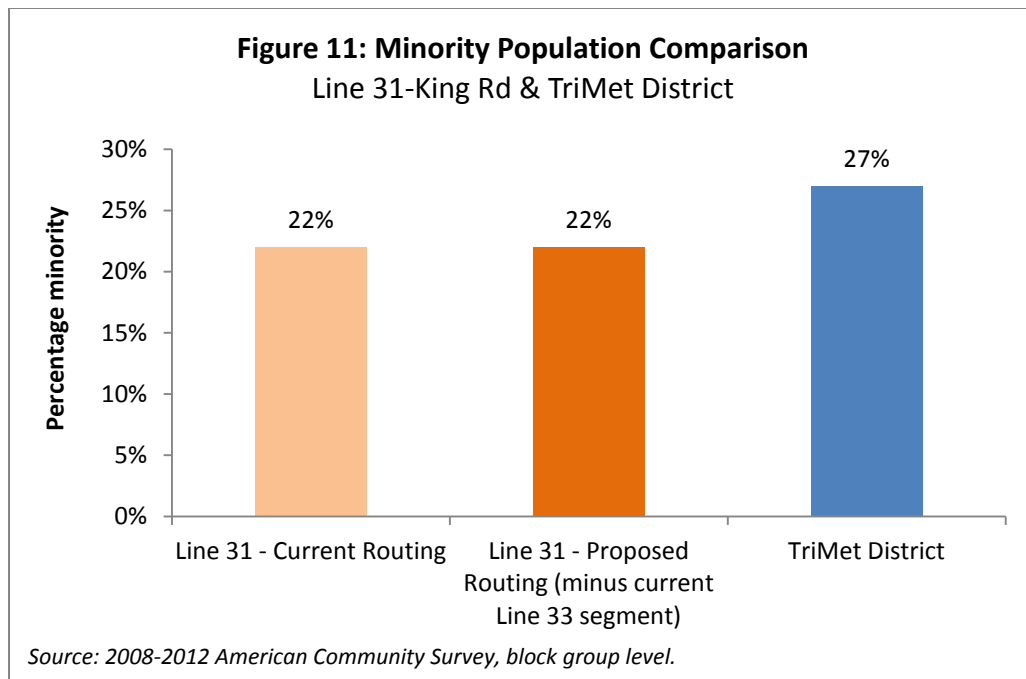
	No. of Stops	Total daily ons/off (weekdays)	Pct. Population Minority	Pct. Population Low-Income
Impacted	32	680	21%	42%
<i>Nearest alternative service w/ similar span & frequency</i>				
Less than ¼ mile to bus or less than ½ mile to rail	30	675	22%	43%
Over ¼ mile to bus and over ½ mile to rail*	2	5	22%	32%

**Adverse effect applies*

Disparate Impact Analysis

Table 5 indicates that the Line 31 stops being removed and meeting the adverse effect criteria are in block groups with minority populations that are lower than average for the TriMet district (22% vs. 27%). Thus, the adverse effects associated with the Line 31 route changes are both minimal impact (few ons/off) and do not result in Disparate Impacts on minority populations.

To analyze the beneficiaries of increased service, Figure 11 compares the minority population along the Line 31 (entire current route and proposed route before combining with Line 33) with the minority population of the TriMet service district as a whole. As shown, the minority population along the current Line 31 and the proposed new route (both 22%) is lower than the district average (27%). The number of minority persons served also decreases significantly (by nearly 1,700), primarily due to the fact that the route will no longer serve Downtown Portland.

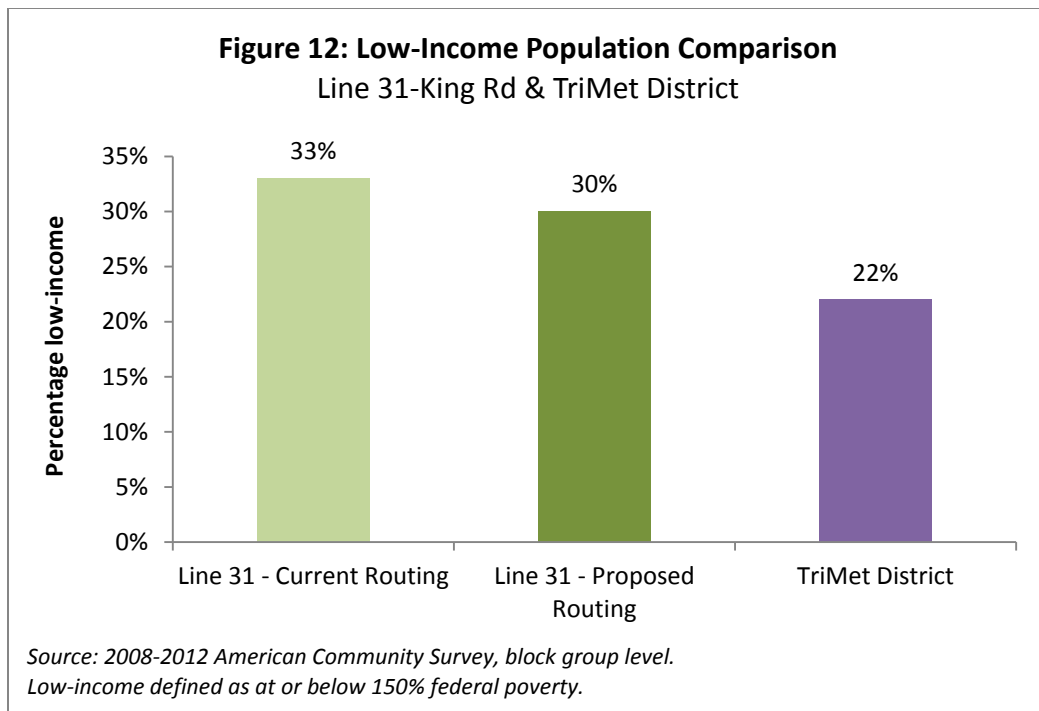


- Taken together, proposed changes to the Line 31-King Rd do not result in disproportionate adverse effects on minority populations, but the service increase benefits an above-average non-minority population.

Disproportionate Burden Analysis

Table 5 shows that the Line 31 stops being removed and meeting the adverse effect criteria are in block groups with low-income populations that are higher than average for the TriMet district (32% vs. 22%). This indicates that the adverse effects associated with the Line 31 route changes, while small because of the small number of boardings the stops see, may result in a Disproportionate Burden on low-income populations.

To analyze the beneficiaries of increased service, Figure 12 compares the low-income population along the Line 31 (entire current route and proposed route before combining with Line 33) with the low-income population of the TriMet service district as a whole. As shown, the low-income population is higher along the Line 31 than the district average (22%), both currently (33%) and as proposed (30%). The drop in low-income population percentage coincides with a drop in low-income persons served (by about 3,000), which is mostly due to the route no longer serving Downtown Portland.



- Taken together, proposed changes to the Line 31-King Rd could result in disproportionate adverse effects on low-income populations, but the service increase benefits an above-average low-income population.

Line 32-Oatfield

Service Change Description

It is proposed that the Line 32:

- Maintain its existing route, frequency, and hours of service between Clackamas Community College and Downtown Milwaukie; and
- Discontinue peak hour service between Downtown Milwaukie and Downtown Portland.

The eliminated segment calls for evaluation of adverse effects.

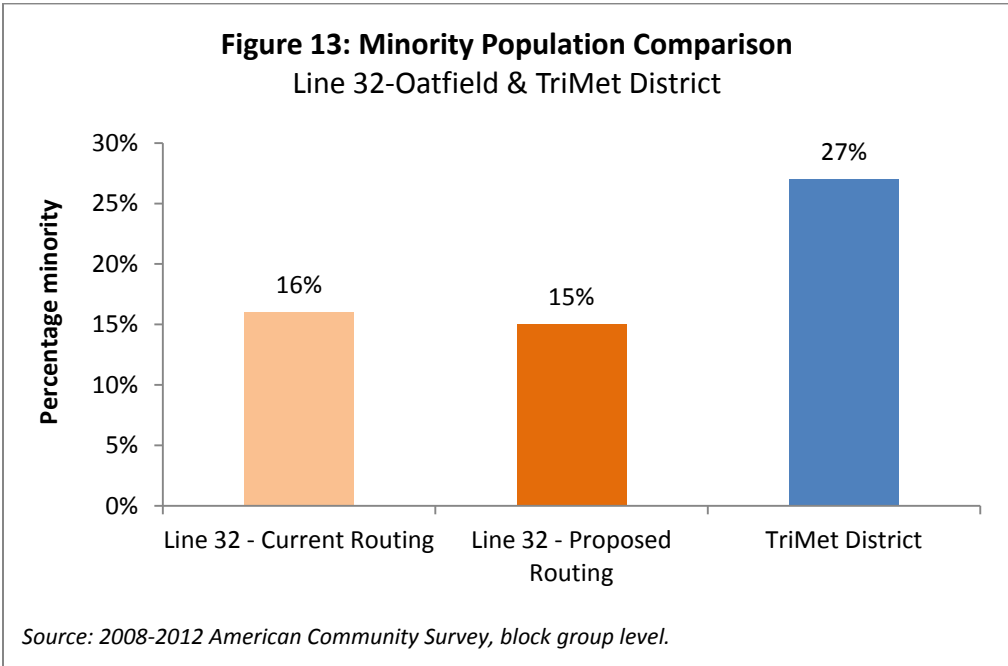
The eliminated segment of the Line 32 is identical to that of the Line 31. As such, the proposed route changes to the Line 32 would remove Line 32 service from a total of 32 stops (including stops in both directions). As Table 6 shows, 30 of these stops have alternative bus service within $\frac{1}{4}$ mile or rail service within $\frac{1}{2}$ mile, which means their service removal does not qualify as an adverse effect under TriMet's Title VI policies. The remaining 2 stops are over $\frac{1}{4}$ mile from similar bus service and over $\frac{1}{2}$ mile from the nearest Orange Line station, thereby meeting the adverse effect definition. These 2 stops see little activity, with 4 total ons/offers on a typical weekday at both stops together.

Table 6: Stops and populations impacted by routing changes to Line 32-Oatfield.				
	No. of Stops	Total daily ons/off (weekdays)	Pct. Population Minority	Pct. Population Low-Income
Impacted	32	440	21%	42%
<i>Nearest alternative service w/ similar span & frequency</i>				
Less than ¼ mile to bus or less than ½ mile to rail	30	436	22%	43%
Over ¼ mile to bus or over ½ mile to rail*	2	4	22%	32%
<i>*Adverse effect applies</i>				

Disparate Impact Analysis

Table 6 indicates that the Line 32 stops being removed and meeting the adverse effect criteria are in block groups with minority populations that are lower than average for the TriMet district (22% vs. 27%). Thus, the adverse effects associated with the Line 32 route changes are both minimal impact (few ons/off) and do not result in Disparate Impacts on minority populations.

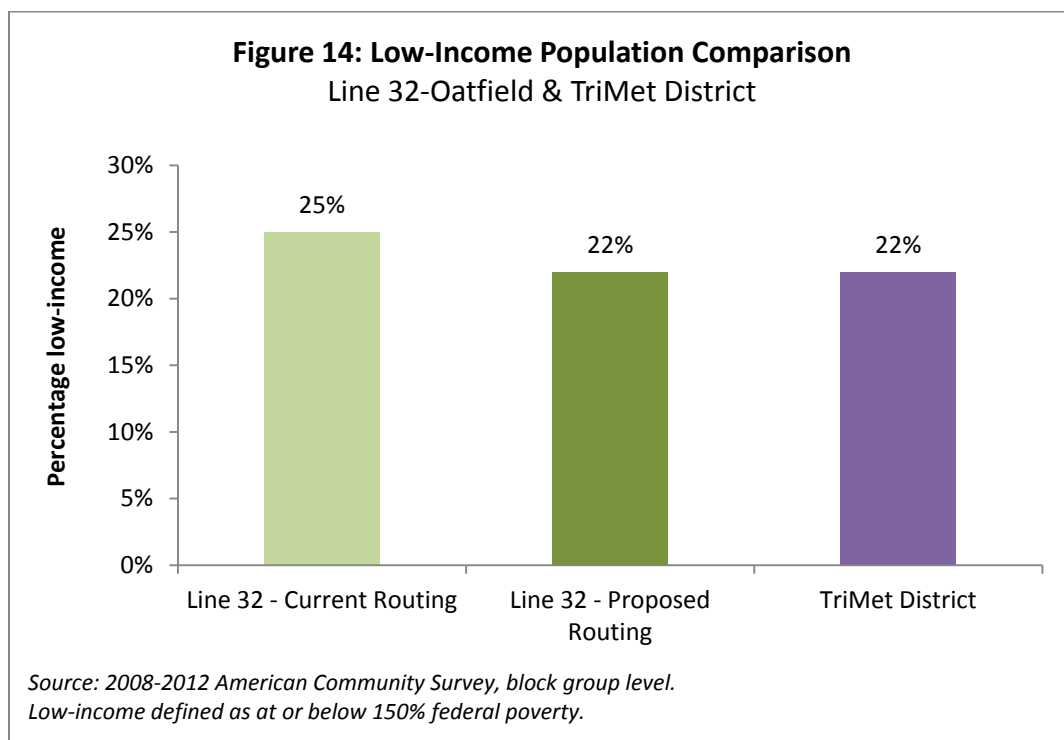
Comparing the current and proposed routing for the Line 32 reveals a drop in the minority population percentage, from 16% to 15% (Figure 13). This is compared to the TriMet District average of 27%. The number of minority persons served would also decrease by approximately 2,000 due to the route no longer serving Downtown Portland.



Disproportionate Burden Analysis

Table 6 shows that the Line 32 stops being removed and meeting the adverse effect criteria are in block groups with low-income populations that are higher than average for the TriMet district (32% vs. 22%). This indicates that the adverse effects associated with the Line 32 route changes, while small, may result in a Disproportionate Burden on low-income populations.

Figure 14 compares the low-income population along the Line 32 (current and proposed routes) with the low-income population of the TriMet service district as a whole. As shown, the low-income population is currently higher along the Line 32 than the district average (25% vs. 22%), and as proposed would make the low-income population even with the district average. The drop in low-income population percentage coincides with a drop in low-income persons served (by about 3,300), which is mostly due to the route no longer serving Downtown Portland.



Line 33-McLoughlin

Service Change Description

It is proposed that the Line 33:

- Maintain its existing route between Clackamas Community College and Downtown Milwaukie;
- Combine with the current Line 31 between Downtown Milwaukie and Clackamas Town Center; and
- Discontinue service between Downtown Milwaukie and Downtown Portland.

Frequency and hours of service would remain the same on the current Line 33 route, but the combination with the Line 31 would increase service between Downtown Milwaukie and Clackamas Town Center. The eliminated segment of the Line 33 calls for evaluation of adverse effects. The service increases along the current Line 31 route were evaluated under the Line 31 section.

The eliminated segment of the Line 33 is mostly identical to that of the Lines 31 and 32. However, Line 33 service is much more substantial than that of the Lines 31 or 32 because it is a Frequent Service line. Therefore, its equivalent service alternatives differ from the Lines 31 and 32.

The proposed route changes to the Line 33 would remove Line 33 service from a total of 36 stops (including stops in both directions). As Tables 7-9 show, 31 of these stops have alternative bus service with similar span & frequency within ¼ mile and/or alternative rail service with similar span & frequency within ½ mile, which means their service removal does not qualify as an adverse effect under TriMet’s Title VI policies. These stops serve 3,864 out of 4,157, or 93%, of all impacted rides on weekdays; 2,525 out of 2,578, or 98%, of all impacted rides on Saturdays; and 1,961 out of 2,000, or 98% of all impacted rides on Sundays.

Removal of service from the remaining 5 stops qualifies as an adverse effect because they do not have similar bus service within ¼ mile, or similar rail service within ½ mile. On a typical weekday these 5 stops see 293 total ons/offers at all 5 stops combined. On Saturdays there are an average of 53 ons/offers, and on Sundays there are an average of 39 ons/offers.

The vast majority of this ridership is from the pair of stops serving the Milwaukie Park & Ride at Main & Milport (253 weekday ons/offers). Although this pair of stops is located within a block group with an above-average low-income population, they are in an industrial area that is not within walking distance of residences; their high ridership is generated by Park & Ride customers. A third stop at Main & Mailwell is nearby in the same industrial district, and is also not within walking distance of low-income residences in its block group; the stop averages 8 ons/offers per weekday. The pair of stops at McLoughlin & Harold are near residences on one side of McLoughlin Boulevard, and average 32 ons/offers per weekday. (See discussion about this pair of stops in Section IV below.)

Table 7: Stops and populations impacted by routing changes to Line 33-McLoughlin (Weekdays Only)				
	No. of Stops	Total daily ons/offers	Pct. Population Minority	Pct. Population Low-Income
Impacted	36	4,157	21%	46%
<i>Nearest alternative service w/ similar span & frequency</i>				
Less than ¼ mile to bus or less than ½ mile to rail	31	3,864	21%	46%
Over ¼ mile to bus or over ½ mile to rail*	5	293	16%	28%
<i>*Adverse effect applies</i>				

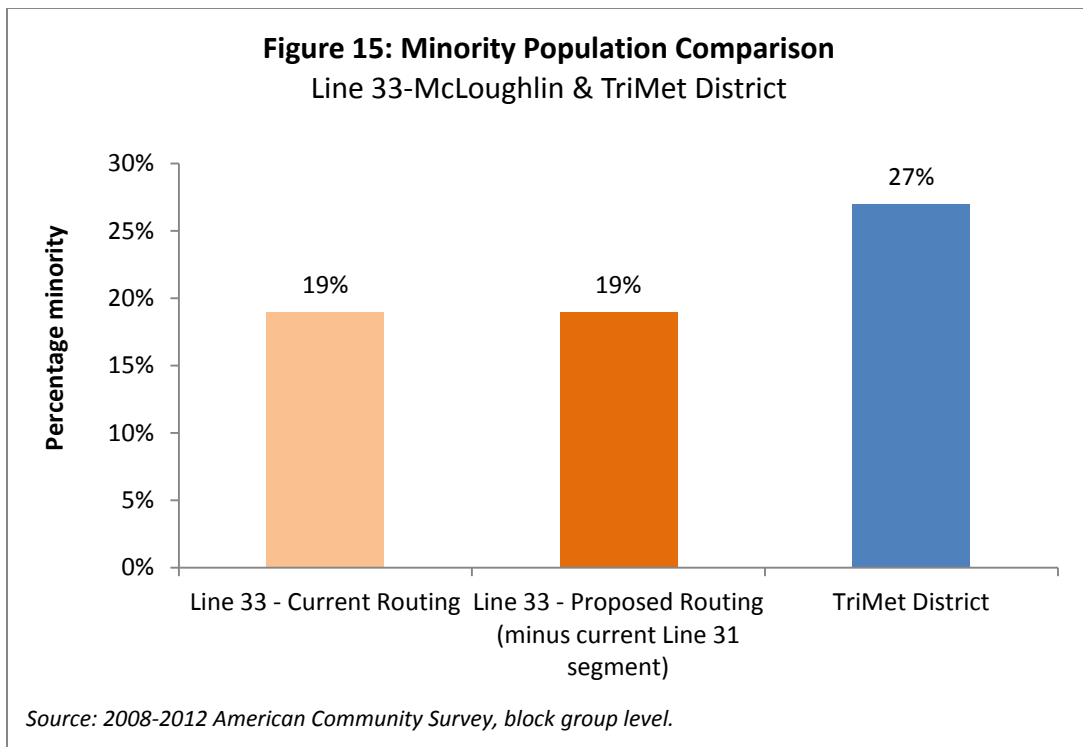
Table 8: Stops and populations impacted by routing changes to Line 33-McLoughlin (Saturdays Only)				
	No. of Stops	Total daily ons/offers	Pct. Population Minority	Pct. Population Low-Income
Impacted	36	2,578	21%	46%
<i>Nearest alternative service w/ similar span & frequency</i>				
Less than ¼ mile bus or ½ mile rail	31	2,525	21%	46%
Between ¼ and ½ mile bus, or over ½ mile rail*	5	53	16%	28%
<i>*Adverse effect applies</i>				

Table 9: Stops and populations impacted by routing changes to Line 33-McLoughlin (Sundays Only)				
	No. of Stops	Total daily ons/offers	Pct. Population Minority	Pct. Population Low-Income
Impacted	36	2,000	21%	46%
<i>Nearest alternative service w/ similar span & frequency</i>				
Less than ¼ mile bus or ½ mile rail	31	1,961	21%	46%
Between ¼ and ½ mile bus, or over ½ mile rail*	5	39	16%	28%
<i>*Adverse effect applies</i>				

Disparate Impact Analysis

Tables 7-9 indicate that the Line 33 stops being removed and meeting the adverse effect criteria are in block groups with minority populations that are lower than average for the TriMet district. The population surrounding these stops is about 16% minority, which is lower than the TriMet district average minority population of 27%. Thus, while the removal of service will have an impact on several hundred riders per day, the change does not result in a Disparate Impact on minority populations.

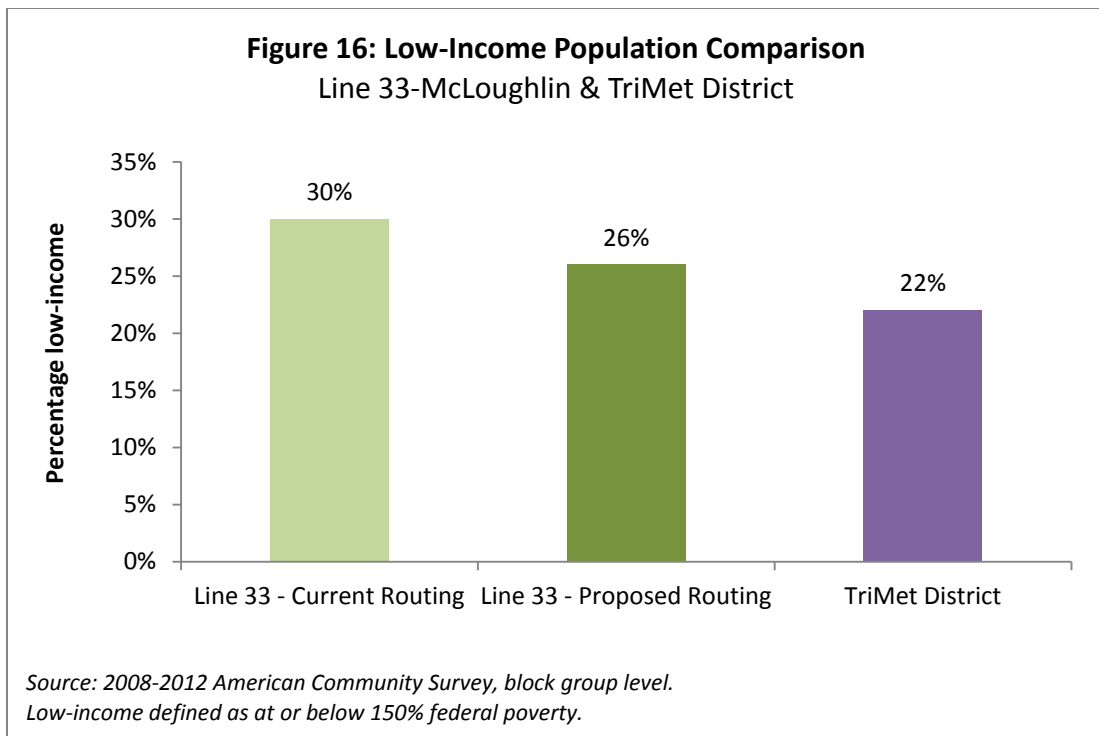
As shown in Figure 15, the minority population percentage would not change under the proposed routing, but the number of minority persons served would drop by about 2,600. This is mostly due to the route no longer serving Downtown Portland. As with the current route, the proposed route would serve an area with a below-average minority population for the TriMet District.



Disproportionate Burden Analysis

Tables 7-9 indicate that the Line 33 stops being removed and meeting the adverse effect criteria are in block groups with low-income populations that are higher than average for the TriMet district. The population surrounding these stops is about 28% low-income, which is higher than the TriMet district average minority population of 22%. Thus, the removal of service has the potential to impact on several hundred riders per day in disproportionately high low-income areas. The change could therefore result in a Disproportionate Burden on low-income populations.

As shown in Figure 16, the low-income population percentage would drop from 30% to 26% under the proposed routing, and the number of low-income persons served would drop by about 5,300. This is mostly due to the route no longer serving Downtown Portland. As with the current route, the proposed route would have an above-average low-income population for the TriMet District.



Line 34-River Rd.

Service Change Description

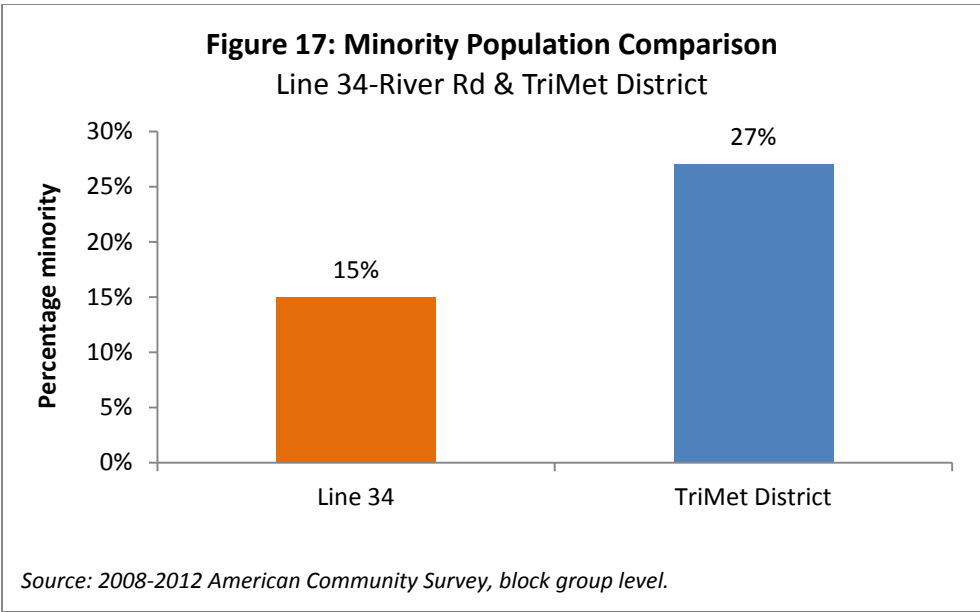
It is proposed that the Line 34:

- Maintain its current route and hours of service between Oregon City and Downtown Milwaukie;
- Double in frequency (from about every 70 minutes to about every 35 minutes); and
- Be combined with the new Line 28.

No Line 34 stops are proposed to be eliminated. As an increase in service, the line-level analysis thusly examines the change through the lens of distribution of benefits.

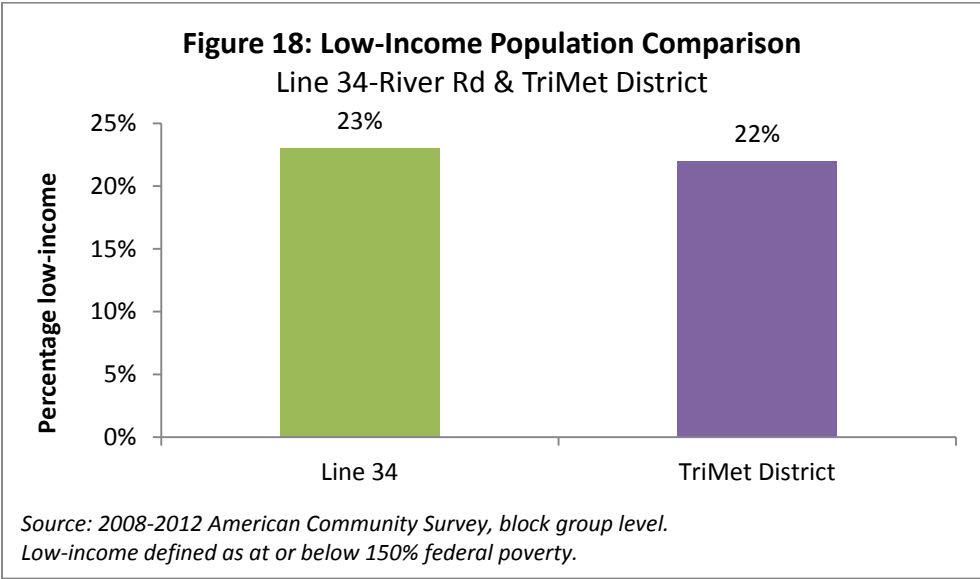
Disparate Impact Analysis

Figure 17 compares the minority population along the current Line 34 with the minority population of the TriMet service district as a whole. As shown, the minority population is lower along the Line 34 than the district average. On its own, this could indicate a potential disparate impact, but should be considered along with the rest of the analysis.



Disproportionate Burden Analysis

Figure 18 compares the low-income population along the current Line 34 with the low-income population of the TriMet service district as a whole. As shown, the low-income population is higher along the Line 34 than the district average. On its own, this could indicate no potential disproportionate burden, but should be considered along with the rest of the analysis.



Line 99

Service Change Description

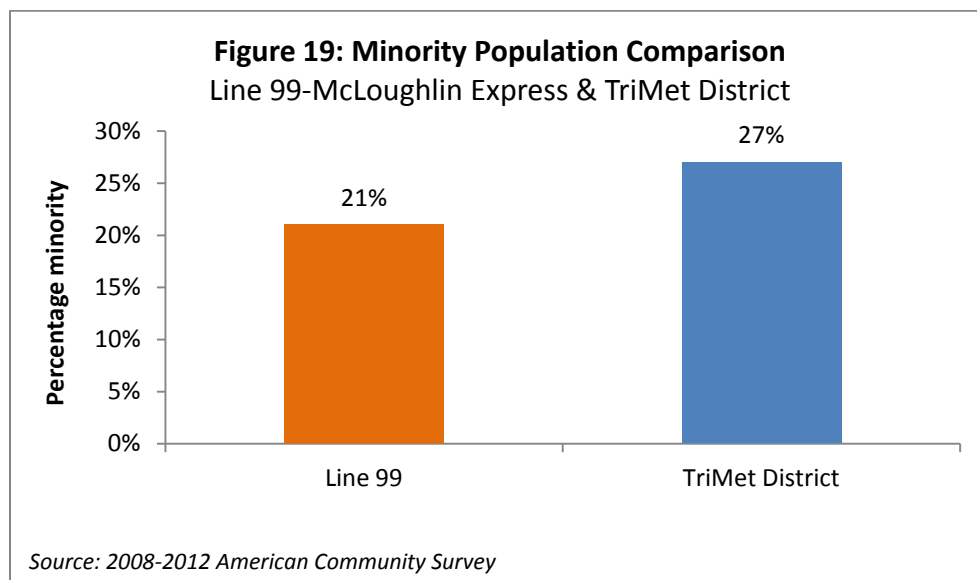
It is proposed that the Line 99:

- Maintain existing frequency and hours of service;
- Add a new service pattern from Downtown Portland to Oregon City in the mornings and the opposite in the evenings; and
- Re-route to cross the Sellwood Bridge, adding limited stops between Sellwood and Downtown Portland⁴.

The line-level analysis examines the new service pattern and additional stops through the lens of the distribution of benefits.

Disparate Impact Analysis

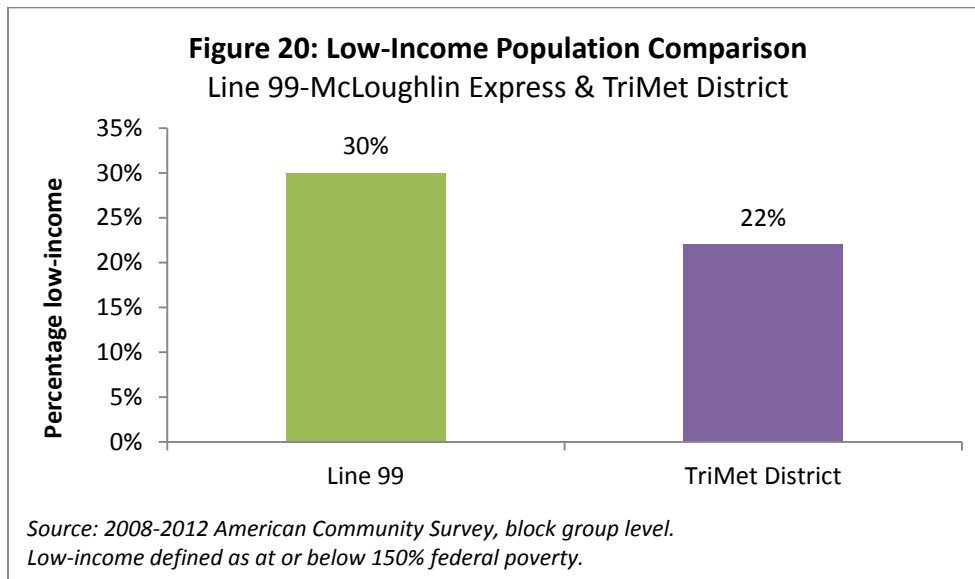
Figure 19 compares the minority population along the current Line 99 with the minority population of the TriMet service district as a whole. As shown, the minority population is lower along the Line 34 than the district average. On its own, this could indicate a potential disparate impact, but should be considered along with the rest of the analysis.



Disproportionate Burden Analysis

Figure 20 compares the low-income population along the current Line 99 with the low-income population of the TriMet service district as a whole. As shown, the low-income population is higher along the Line 99 than the district average. On its own, this could indicate no potential disproportionate burden, but should be considered along with the rest of the analysis.

⁴ Once construction of the new Sellwood Bridge is complete. Projected for 2016.
Equity Analysis: Orange Line MAX Startup & Bus Service Plan, April 2015



B. System-level Analysis

Beyond looking at each line individually, TriMet analyzes the impact all service changes together have on the minority and low-income populations in the service district, according to the Title VI policies described previously.

Disparate Impact Analysis

This analysis compares the proportion of the TriMet district’s minority and non-minority populations that would be impacted by the proposed service changes, both positively and negatively. Table 10 and Figures 21-22 presents the results of this comparison, indicating that no Disparate Impact exists in terms of the negative impacts, i.e. service removals. Additionally, while less than 1% of the district’s minority population stands to be negatively impacted by adverse effects related to access to bus stops, over 5% stand to benefit from service improvements. However, the overall service package does appear to benefit non-minorities disproportionately; over 20% more of the TriMet district’s non-minority population lives in the area where service additions/increases are planned as compared to the minority population.

Taken together, these results show that in terms of benefits and burdens associated with planned service changes, minority populations stand to be impacted positively more than negatively, would not experience as much of the burden as non-minority populations, but would also not see as much of the benefit.

Table 10: System-level Disparate Impact Analysis

	Pct. of TriMet District Non-Minority Pop Impacted	Minority Pop Disparate Impact Threshold	Pct. of TriMet District Minority Pop Impacted	Potential Disparate Impact?
Service Removals	1.6%	Greater than 1.9%	0.9%	No
Service Additions/Increases	8.8%	Less than 7.0%	5.1%	Yes

Figure 21: System-level impacts of service additions/increases
Minority and Non-minority Populations

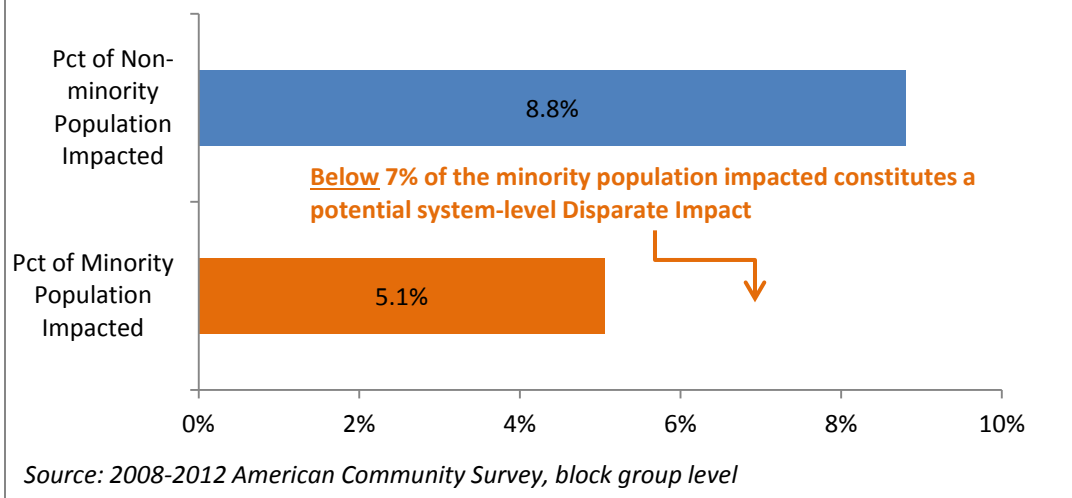
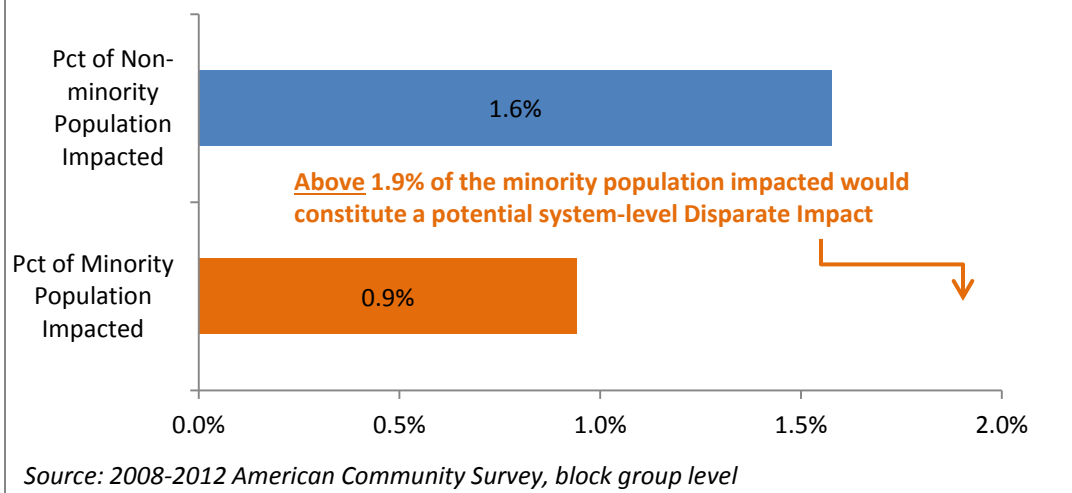


Figure 22: System-level impacts of service removals
Minority and Non-minority Populations

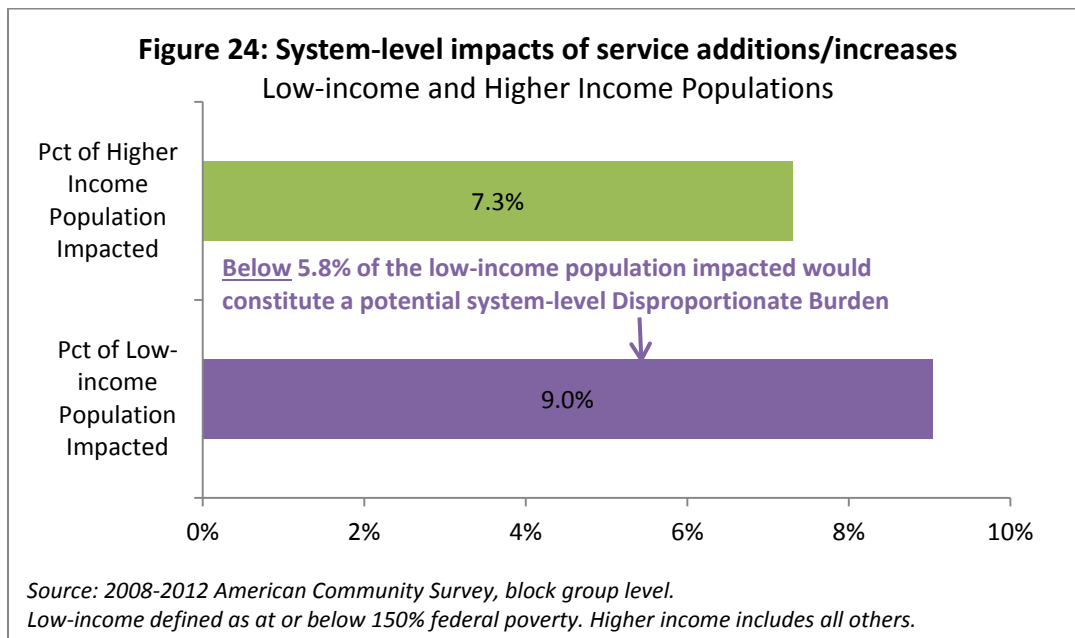
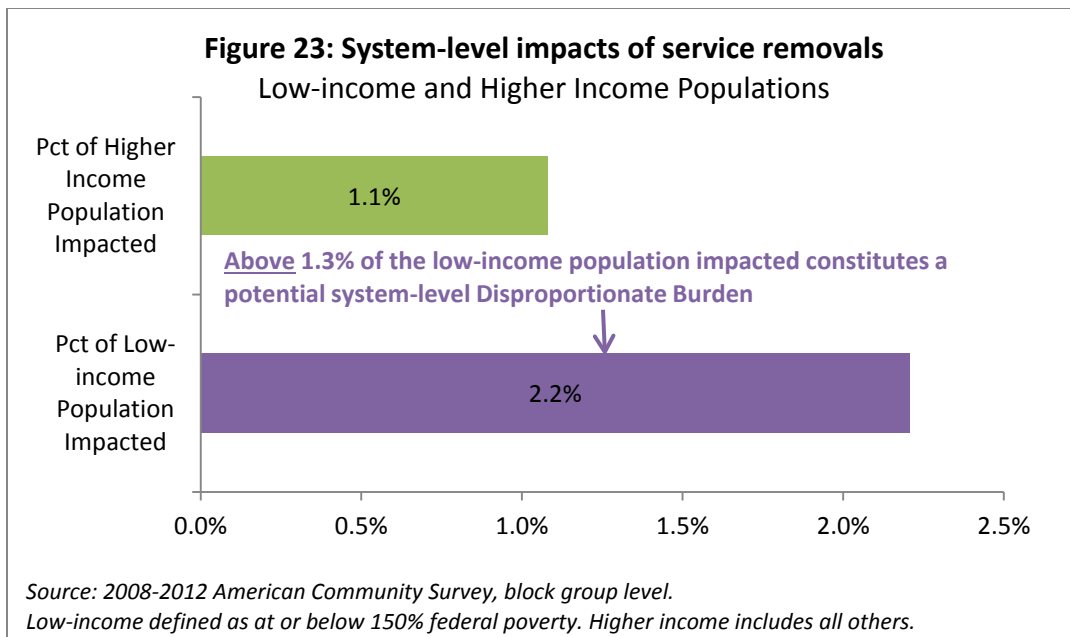


Disproportionate Burden Analysis

This analysis compares the proportion of the TriMet district’s low-income and higher income populations that would be impacted by the proposed service changes, both positively and negatively. Table 11 and Figures 23-24 present the results of this comparison, indicating that a disproportionate burden exists in terms of negative impacts, i.e. service removals; over 20% more of the TriMet district’s low-income population lives in the areas where service removals are planned as compared to the higher income population. At the same time, the overall service package does appear to benefit a greater portion of the low-income than higher income population, and while about 2% of the district’s low-income population live in areas of service removals, 9% live in areas of service improvements.

Taken together, these results show that in terms of benefits and burdens associated with planned service changes, low-income populations stand to be impacted positively more than negatively, would see more of the benefit than higher income populations, but would also experience more of the burden of service removals than higher-income populations.

	Pct. of TriMet District Non-Low-Income Pop Impacted	Low-Income Pop Disproportionate Burden Threshold	Pct. of TriMet District Low-Income Pop Impacted	Potential Disproportionate Burden?
Service Removals	1.1%	Greater than 1.3%	2.2%	Yes
Service Additions/Increases	7.3%	Less than 5.8%	9.0%	No



C. Summary of Findings

Disparate Impact

As Table 12 summarizes, no Disparate Impact was identified related to the adverse effects of service removal at stops that would have otherwise duplicative service. That is, minority populations would not be negatively impacted to a greater extent than non-minority populations as a result of service removals.

In terms of benefits, a potential Disparate Impact was identified related to proposed changes. This area of the TriMet service district has a lower-than-average minority population, and the service increases proposed potentially benefit non-minority populations to a greater extent than minority populations. However, these increases exist because of TriMet's commitment to reinvest bus service hours currently provided within the Orange Line corridor, but would be duplicative with the Orange Line. Because of this, *TriMet concludes that this does not constitute a Disparate Impact.*

Disproportionate Burden

Also shown in Table 12, *a Disproportionate Burden was identified* related to the adverse effects of service removal. That is, low-income populations may be negatively impacted as a result of service removals to a greater extent than those above 150% federal poverty.

On the other hand, no Disproportionate Burden was found for proposed service improvements, including service provided by the new MAX Orange Line. Increases in service look to potentially benefit low-income populations to a greater degree than higher income populations, based on the population of the service areas.

Table 12: Summary of Disparate Impact and Disproportionate Burden Analyses

Line	Change in Service Hours (Frequency and/or Span)	Change in Route Length	Service Reductions (Adverse Effects/Burdens)		Service Improvements (Benefits)	
			Potential Disparate Impact?	Potential Disproportionate Burden?	Potential Disparate Impact?	Potential Disproportionate Burden?
MAX Orange Line	New Route	New Route	N/A*	N/A	Yes	No
Line 19-Woodstock/Glisan (Saturday)	+13%	N/A	N/A	N/A	Yes	No
Line 19-Woodstock/Glisan (Sunday)	+14%	N/A	N/A	N/A	Yes	No
Line 28-Linwood	+63%	+180%	No	Yes	Yes	No
Line 31-King Rd (Weekdays)	+85%	+31% -61%	No	Yes	Yes	No
Line 31-King Rd (Saturday)	+157%	+31% -61%	No	Yes	Yes	No
Line 31-King Rd (Sunday)	+391%	+31% -61%	No	Yes	Yes	No
Line 32-Oatfield	0%	-35%	No	Yes	N/A	N/A
Line 33-McLoughlin	0%	+23% -42%	No	Yes	N/A	N/A
Line 34-River Rd	+175%	+60%	N/A	N/A	Yes	No
Line 99-McLoughlin Express	+100%	+7%	N/A	N/A	Yes	No
All Combined (System-level)	+42% Bus; New Rail Route	+22%	No	Yes	Yes	No

*N/A indicates that the corresponding line did not have service reductions (center two columns) or service improvements (right two columns), so Disparate Impact and Disproportionate Burden analyses do not apply.

IV. Further Analysis and Alternatives

Having identified a Disproportionate Burden associated with the proposed service changes, TriMet is required by the Circular to avoid, minimize, or mitigate impacts where practicable.

In order to better understand the extent of the issues identified and how to address them, staff conducted further analysis in response to the findings. Through an examination of stop characteristics including boardings, surrounding environment, and alternative service, staff identified the stop pair at SE Harold & McLoughlin as having a notable negative impact and also an above-average low-income population. Staff thusly conducted an ad-hoc rider survey at this stop, as well as two others to get a better idea at the ground level of what impacts might be (survey instrument attached in Appendix B). The survey was administered on two weekdays during peak hours and one Saturday during the midday at three stops where service is proposed to be removed. It received little response, largely due to the low ridership at the surveyed stops. Results did indicate the following:

- Most respondents plan to use the MAX Orange Line, Line 19, and/or Line 70 after the service changes.
- Some respondents were unsure of what they would do after the service changes.
- A few respondents surveyed were transit dependent.

Informed by this survey as well as internal discussions, staff provided the following options for leadership consideration.

Option 1: Provide bus service directly connecting primary stops of concern to MAX Orange Line (Avoid/Minimize)

This option would most directly address the results of the Title VI equity analysis by removing concerns about a potential Disproportionate Burden due to service removal. It would serve to avoid, or at least minimize, the potential negative impacts identified. However, it would require an estimated \$250,000 per year or more to provide with limited returns in terms of ridership. It would also still require a transfer to other services to reach downtown Portland or most other employment, medical or other destinations. It may also reduce ridership on the MAX Orange Line where the two routes parallel one another.

Option 2: Review Line 19 for further increased service (Mitigate)

The frequency of the Line 19 could be increased to help mitigate for removal of the Line 33 connection from the Orange Line corridor to downtown Portland. Similarly to Option 1, this is estimated to cost at least \$250,000 per year.

Option 3: Take no additional action

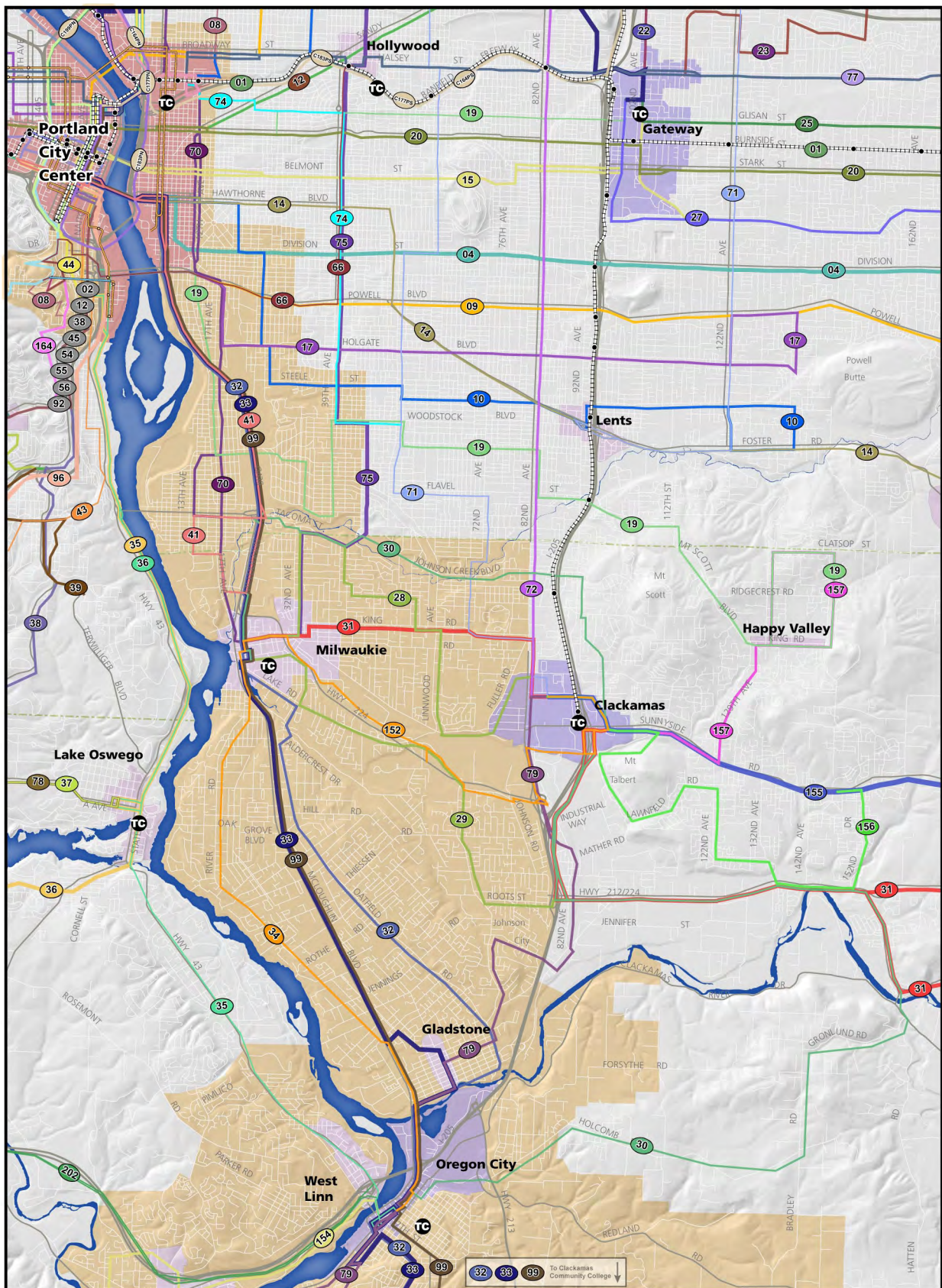
TriMet could keep the service plan as proposed, as long as the agency can demonstrate why avoiding, minimizing, or mitigating for the Disproportionate Burden identified is not practicable.

V. Agency Decision

The overall potential benefits of the proposed service plan to residents and riders in the Orange Line corridor are significant. Such benefits include improved travel times, increased frequency and span of bus service, and better schedule reliability due to the Orange Line's separated right-of-way. TriMet wants to ensure that all residents of the corridor have fair access to these benefits, regardless of race, ethnicity, or income.

Having reviewed and considered the options described in Section IV of this report, TriMet leadership is proposing moving forward with Option 3, thereby adopting the Orange Line MAX service plan as proposed. The justification for doing so centers around return on investment. The cost of pursuing Option 1 or Option 2 is not justified by the potential ridership generated. Either option may require reducing service elsewhere in the corridor, or elsewhere in the TriMet system. Or, if invested without any reductions, this amount of funding could be better used to improve service elsewhere in the system, providing a greater benefit to a greater number of riders (including minority and low-income riders).

**APPENDIX A: Proposed service changes from Portland-Milwaukie Light Rail
Final Environmental Impact Statement, October 2010**

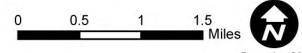


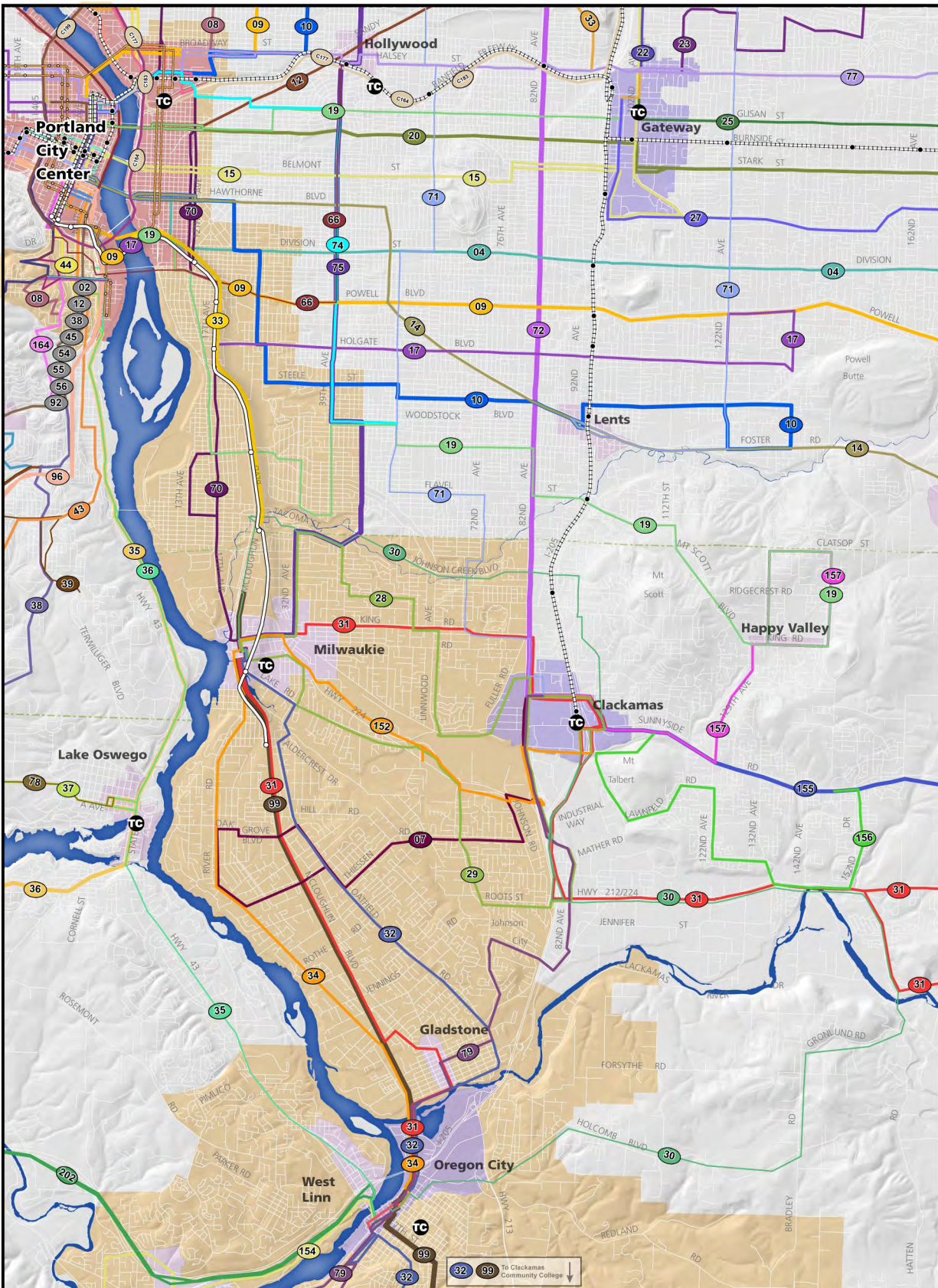
Portland-Milwaukie Light Rail Project

Figure 4.2-1

2030 No-Build Transit Network

- Bus Route
- Light Rail and Station
- Streetcar and Station
- Portland Aerial Tram
- Transit Center
- City Center
- Regional Center
- Town Center
- Portland-Milwaukie Corridor












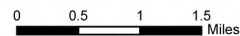


Portland-Milwaukie Light Rail Project

Figure 4.2-2

2030 Light Rail Alternative Transit Network

-  Bus Route
-  Light Rail Alternative and Station
-  Light Rail and Station
-  Streetcar and Station
-  Portland Aerial Tram
-  Transit Center
-  City Center
-  Regional Center
-  Town Center
-  Portland-Milwaukie Corridor



APPENDIX B: Bus Stop Intercept Survey

Surveyor initials: _____	Date: _____	Time: _____	Stop ID#: _____
Tally: Refusal _____	Q1 terminate: _____	Incentive: _____	

Hello, I work for TriMet and I'm asking a few questions about your use of this stop.

1. First, did you come to this stop from your home?

- ₁ Yes ₂ No → Thank, terminate and tally

2. Please tell me the street and cross street closest to your home. Or if you prefer, what is your home address?

3. How many people live in your home? _____

4. (Hand card) What was your household income before taxes in 2014? Please read me the letter that indicates your income. (Take card back)

Record letter: _____

5a. Is it closer to your home to take the line 70 that travels on SE 17th? (show map if needed)

- ₁ Yes ₂ No ₃ Don't know

5b. Is it closer to your home to take the line 19 that travels on Milwaukie Ave? (show map if needed)

- ₁ Yes ₂ No ₃ Don't know

If yes in 5a or 5b

5c. Since the other route is closer, why are you taking a bus from this stop? (check all that apply)

- ₁ More frequency
₂ Runs more hours in the day (span of service)
₃ Other: _____

6. Do you have a vehicle you could use for this bus trip either as a driver or passenger?

- ₁ Yes ₂ No ₃ Don't know

7. Where is the destination location of the trip you are about to take? You can tell me the street and cross street or a landmark such as Pioneer Courthouse Square.

8. In September this stop will be removed due to the Orange Line travelling along McLoughlin. How will you make this trip when that happens? (check all that apply)

- ₁ Take line 70
₂ Take line 19
₃ Take Orange Line
₄ Will not make this trip on transit
₅ Don't know
₆ Other: _____

Thank you, those are all the questions I have.

Date: May 27, 2015
To: Board of Directors
From: Neil McFarlane *Neil McFarlane*
Subject: **ORDINANCE NO. 339 OF THE TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET) ADOPTING SERVICE CHANGES, UPDATING ROUTE DESIGNATIONS AND AMENDING TRIMET CODE CHAPTER 22, AND REPEALING TRIMET CODE CHAPTER 20, CHARTER RATES (SECOND READING)**

1. Issue or Purpose of Item

The purpose of Ordinance No. 339 is to request that the TriMet Board of Directors (“Board”) adopt service changes and update route designations contained in TriMet Code Chapter 22. In addition, Ordinance No. 339 includes a housekeeping repeal of TriMet Code Chapter 20, Charter Rates, to remove outdated provisions.

2. Type of Agenda Item

- Initial Contract
- Contract Modification
- Other: Ordinance

3. Reason for Board Action

The Board may adopt service changes and update TriMet Code route designations by ordinance. The TriMet Code may be amended only by adoption of an ordinance, including repeal of existing provisions.

4. Type of Action:

- Resolution
- Ordinance 1st Reading
- Ordinance 2nd Reading
- Other _____

5. Background

The approved Fiscal Year 2016 budget includes bus and rail service improvements. Restoring bus and rail frequent service seven days per week and the start up of the new Portland Milwaukie light rail line and the subsequent bus service changes associated with that have been the focus for service improvement planning in the last 18 months. With the September changes to Sunday bus frequency, all 12 frequent service bus and rail lines will have 15 minute or better frequency 7 days per week, most hours of the day.

A. Service Change Public Process:

Starting assumptions. The 2010 Final Environmental Impact Statement for the Portland-Milwaukie Light Rail Transit Project (MAX Orange Line) included assumptions about bus service changes that would accompany the new light rail service. Primarily, all bus lines that currently travel McLoughlin Boulevard into downtown Portland would instead turn around in downtown Milwaukie, and buses that currently cross the Ross Island Bridge would instead use Tilikum Crossing.

In early 2014, TriMet asked the community for feedback on those starting assumptions and received over 350 comments online, at four open houses and at over 20 community meetings.

Initial proposal. TriMet used that community feedback to develop an initial proposal which was shared with riders during the summer of 2014. The initial proposal sought to address as many of the issues that came up from feedback received as possible.

This initial proposal was distributed to more than 4,000 riders on-board in English and in Spanish, to over 22,000 email subscribers, and by direct mail to over 20,000 addresses. TriMet hosted four open houses and attended several neighborhood meetings. Over 1,400 comments were submitted, which TriMet used to refine the proposal.

Final proposal. Based on feedback gathered during the summer, TriMet shared the final proposal with riders during the fall of 2014. Small changes were made to the initial proposal in response to feedback received. This final proposal was distributed to more than 3,000 riders on-board in English and in Spanish and to over 23,000 email subscribers. TriMet hosted one open house and attended several community meetings. Over 300 comments were submitted, mostly echoing feedback from earlier outreach efforts.

Recommended Service Changes:

- Opening the Portland Milwaukie light rail line (“Orange line”) with service between Clackamas County and downtown Portland via a new bridge over the Willamette River;
- Bus service realignment and/or more frequency on 9 bus lines due to the Portland Milwaukie light rail start-up;
- Frequent service restoration on bus and rail;
- Improvements on a handful of busy lines to relieve overcrowding and improve schedule reliability; and
- Changes recommended in the Westside Service Enhancement Plan to address growth in jobs and development.

B. Title VI Transit Equity Analyses:

In accordance with Federal Transit Administration (FTA) Title VI Circular 4702.1B implementing Title VI of the Civil Rights Act, major service changes and all service changes associated with new fixed guideway capital projects must be analyzed to identify potential disproportionate impacts to minority and low-income populations.

Two Title VI service equity analyses (“Reports”) were conducted for the service changes included in Ordinance No. 339. These Reports analyzed weekend restoration of frequent service and service changes related to the MAX Orange Line startup, respectively. Other service changes included in Ordinance No. 339, namely restoration of weekday evening frequent service, did not meet the major service change thresholds requiring an equity analysis. The Reports evaluated adverse effects as well as benefits associated with the proposed service changes. To summarize the results, the Reports find no disparate impact on minority riders. The Report on the startup of the MAX Orange Line and related bus service changes identified a potential disproportionate burden on low-income populations due to proposed stop removals, leading to more detailed research and analysis by staff. This further analysis concluded that in terms of associated costs and project goals, it was not practicable to modify the service plan.

Staff presented the preliminary Reports to the Board at their February 25, 2015 and March 25, 2015 Board meetings. The Reports were submitted to the FTA Region X Civil Rights Officer, to TriMet’s Transit Equity Advisory Committee (“TEAC”) for their review and comment, and have been posted on TriMet’s website and available for public review. The Board was provided the two final Reports for adoption of Ordinance No. 339, dated March 3, 2015 and April 17, 2015, respectively, prior to the April 22, 2015 meeting.

C. Updates to TriMet Code Chapter 22:

The routing and schedule changes as proposed would be operative on September 13, 2015, and as otherwise shown in Exhibit A of Ordinance No. 339. Updates to route designations set forth in TriMet Code Chapter 22 would be as shown in Exhibit A.

D. Repeal of TriMet Code Chapter 20, Charter Rates:

Ordinance No. 339 includes a housekeeping repeal of TriMet Code Chapter 20, Charter Rates, which contains outdated legal and operative provisions relating to charter service. Federal law and Federal Transit Administration (FTA) regulations extensively restrict federally-funded operators from providing charter services, subject to very narrow exceptions. The purpose of the FTA regulations, which apply to use of federally-funded buses and vans, is to protect private charter operators from unauthorized competition from recipients of federal financial assistance. TriMet has not provided bus charter service since the early 1990s, which was pursuant to prior, superseded FTA guidance, and does not provide light rail charter service due to system operational priorities and constraints. Repeal of TriMet Code Chapter 20 as set forth in Exhibit A to Ordinance No. 339 will serve to clarify the agency’s current policies with respect to charter services.

6. **Options, if any**

The Board may choose to not conduct a second reading and not adopt Ordinance No. 339. This option is not recommended. These recommended service changes are necessary to open Orange Line MAX and make associated bus line improvements in September 2015. Changes are needed to maintain capacity and reliability and make investments to help advance future planned improvements.

7. **Recommendation**

The General Manager recommends that the Board conduct a second reading and adopt Ordinance No. 339 at the May 27, 2015 Board meeting.

ORDINANCE NO. 339

AN ORDINANCE OF THE TRI-COUNTY METROPOLITAN
TRANSPORTATION DISTRICT OF OREGON (TRIMET) ADOPTING
SERVICE CHANGES, UPDATING ROUTE DESIGNATIONS AND AMENDING
TRIMET CODE CHAPTER 22, AND REPEALING TRIMET CODE CHAPTER
20, CHARTER RATES

THE BOARD OF DIRECTORS OF THE TRI-COUNTY METROPOLITAN
TRANSPORTATION DISTRICT OF OREGON (TRIMET), pursuant to the authority of Oregon
Revised Statutes Chapter 267, having considered the transit equity service change analysis final
Reports, does hereby ordain and decree the following Ordinance:

Section 1 - Adoption of Service Changes

Service Changes are adopted as set forth on the attached Exhibit A, which is incorporated into
and made part of this Ordinance. In accordance with TriMet Code Section 22.05, new Schedule
Notices shall be filed for affected lines.

Section 2 - Amendment of TriMet Code Chapter 22

TriMet Code Section 22.05 is amended to make the Route Designation updates set forth on the
attached Exhibit A.

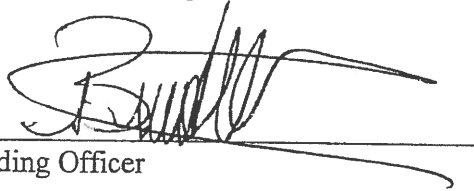
Section 3 - Repeal of TriMet Code Chapter 20, Charter Rates

TriMet Code Chapter 20, Charter Rates, is repealed in its entirety as set forth on the attached
Exhibit A.

Section 4 - Effective/Operative Dates

This Ordinance shall take effect thirty days after the date of its adoption. Operative dates for
specific Service Changes and Route Designation updates shall be as designated on Exhibit A.

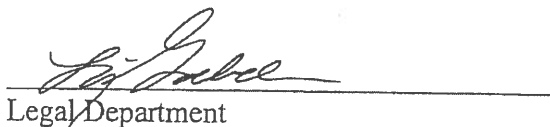
Date Adopted: May 27, 2015



Presiding Officer

Attest:
Kelley Runyon
Recording Secretary

Approved as to Legal Sufficiency:



Legal Department

**ORDINANCE NO. 339
EXHIBIT A**

I. Service Changes and TriMet Code Chapter 22 Route Designation Updates

Service Changes are adopted and TriMet Code Chapter 22 Route Designations are updated as set forth below:

Section 1 - Service Changes

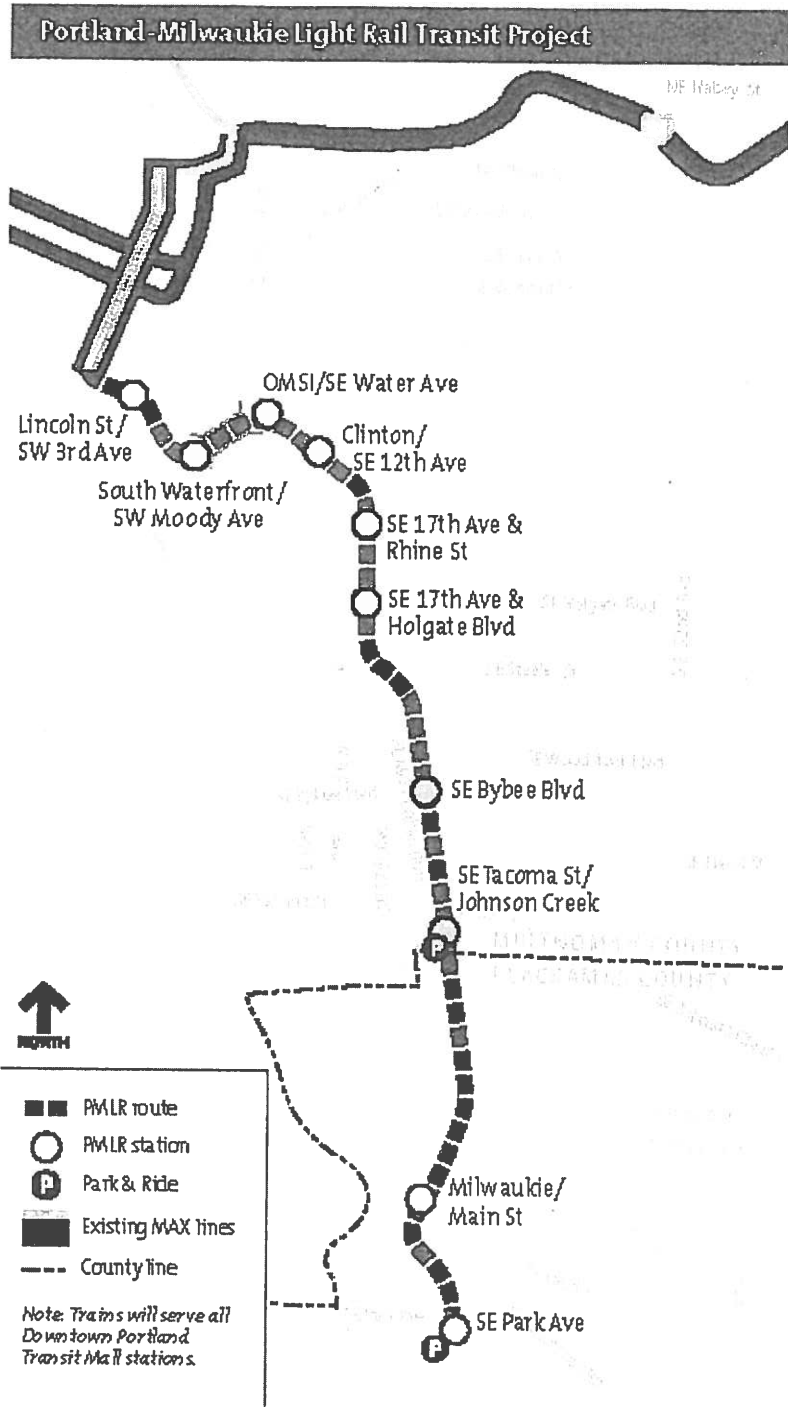
A. Service Changes (Operative on September 13, 2015)

Existing Line	Description
4-Division/Fessenden	Trips added on Sundays for 15 minute Frequent Service.
6-M L King Jr Blvd	Trips added on Sundays for 15 minute Frequent Service.
8-Jackson Park/NE 15 th Ave	Trips added on Sundays for 15 minute Frequent Service.
9-Powell Blvd	Route would be realigned to travel across the Tilikum Crossing, <i>Bridge of the People</i> , and Harbor Viaduct. Trips added during weekdays to extend Frequent Service out to Gresham. Trips added on Sundays for 15 minute Frequent Service.
12-Barbur/Sandy Blvd	Trips added on Sundays for 15 minute Frequent Service.
14-Hawthorne	Trips added on Sundays for 15 minute Frequent Service.
15-Belmont/NW 23 rd Ave	Trips added on Sundays for 15 minute Frequent Service.
17-Holgate/Broadway	Route would be realigned to travel across the Tilikum Crossing and Harbor Viaduct.
19- Woodstock/Glisan	5 trips would be added to Saturday and Sunday schedules. All trips would start and end at Flavel approximately 2 hours earlier than current.
28-Linwood*	Route would be realigned to travel along Linwood, Johnson Creek Blvd, into the Tacoma Park & Ride, Tenino, McLoughlin, Ochoco, Main into downtown Milwaukie. The route would be combined with the existing line 34-River Rd. Frequency of buses would change from about every 70 minutes to about every 35 minutes.
29-Lake/Webster Rd	Route would be realigned to travel along Washington to McLoughlin to Jackson to downtown Milwaukie.
30-Estacada	The express trip from Estacada that serves Clackamas Town Center and then turns into a 31-King Rd. express into downtown Portland will continue, but will be renamed 30E-Estacada Express. This is one trip to downtown Portland in the morning, and one trip out of downtown Portland in the afternoon.
31-King Rd*	Route would be combined with the existing line 33-McLoughlin.

	Neither route would continue north to downtown Portland. Frequency would change from about every 35 minutes weekdays and Saturdays, 60 minutes on Sundays to about every 15 minutes 7 days per week.
32-Oatfield	This route would no longer travel to downtown Portland. It would make connections to MAX Orange line at the Lake Road Station.
33-McLoughlin	Route would be combined with the existing line 31-King Rd. Neither route would continue north to downtown Portland. All trips would continue south to Clackamas Community College. This line would have trips added on Sunday to make it frequent service.
34-River Rd*	Route would be combined with the existing line 28-Linwood. Frequency of buses would change from about every 70 minutes to about every 35 minutes.
54-Beaverton Hillsdale Hwy/56-Scholls Ferry Rd	Trips added Sundays for frequent service restoration in September 2015.
57-TV Hwy/Forest Grove	Trips added Sundays for frequent service restoration in September 2015.
75-Cesar Chavez/Lombard	Trips added Sundays for frequent service restoration in September 2015.
99-McLoughlin Express	Route would be realigned to travel along McLoughlin, to downtown Milwaukie at Jackson, 21 st , Harrison, Main, Ochoco, McLoughlin, into the Tacoma Park & Ride, Tacoma, Sellwood Bridge, Macadam, Arthur, 1 st , Harrison, 6 th in downtown Portland. Outbound it would travel along 5 th to Harrison, 1 st , Kelly, Macadam, Sellwood Bridge, Tacoma, Tacoma Park & Ride, McLoughlin, Ochoco, Main, Harrison, 21 st , Jackson, McLoughlin. The route would no longer be an express route and it would serve passengers both inbound to Portland and outbound from Portland to Oregon City in both the morning and afternoon peak hours.
154-Willamette	Trips added and route extended up to Oregon City Manor.
MAX Orange Line	New light rail service between downtown Portland and Clackamas County at Park Avenue and McLoughlin Blvd. Service will run 7 days/week, about every 15 minutes. See map below
Orange Line light rail service (service after 11:30p weekdays and after 12:30a weekends to be provided by the Orange Night Bus)	New light rail service between downtown Portland and Clackamas County at Park Avenue and McLoughlin. Service would run 7 days per week, with approximately 15 minute frequency. Service late at night from downtown Portland south to Park Avenue Station would be provided by the 291-Orange Night Bus.

*Bus Line numbers 28 and 31 will be deleted. Both of these routes will be combined with other bus lines, the 28 will be combined with the 34, and the 31 will be combined with the 33.

MAX Orange Line (Portland-Milwaukie Light Rail Transit Project)



B. Service Changes (Operative as designated below)

Existing Line	Description
4-Division/Fessenden	Trips added evening hours for 15m frequent service restoration on weekdays. Service implemented December 2014. Trips added Saturdays for frequent service restoration in March 2015.
6-M L King Jr Blvd	Trips added evening hours for 15m frequent service restoration on weekdays. Service implemented December 2014. Trips added Saturdays for frequent service restoration in March 2015.
8-Jackson Park/NE 15 th Ave	Trips added evening hours for 15m frequent service restoration on weekdays. Service implemented December 2014. Trips added Saturdays for frequent service restoration in March.
9-Powell Blvd	Trips added evening hours for 15m frequent service restoration on weekdays. Service implemented December 2014. Trips added Saturdays for frequent service restoration in March 2015.
12-Barbur/Sandy Blvd	Trips added evening hours for 15m frequent service restoration on weekdays. Service implemented December 2014. Trips added Saturdays for frequent service restoration in March 2015.
14-Hawthorne	Trips added evening hours for 15m frequent service restoration on weekdays. Service implemented December 2014. Trips added Saturdays for frequent service restoration in March 2015.
15-Belmont/NW 23 rd Ave	Trips added evening hours for 15m frequent service restoration on weekdays. Service implemented December 2014. Trips added Saturdays for frequent service restoration in March 2015.
33-McLoughlin	Trips added evening hours for 15m frequent service restoration on weekdays. Service implemented December 2014. Trips added Saturdays for frequent service restoration in March 2015.
54-Beaverton Hillsdale Hwy/56-Scholls Ferry Rd	Trips added evening hours for 15m frequent service restoration on weekdays. Service implemented December 2014. Trips added Saturdays for frequent service restoration in March 2015.
57-TV Hwy/Forest Grove	Trips added evening hours for 15m frequent service restoration on weekdays. Service implemented December 2014. Trips added Saturdays for frequent service restoration in March 2015
72-82 nd Avenue	Trips added evening hours for 15m frequent service restoration on weekdays.
75-Cesar Chavez/Lombard	Trips added evening hours for 15m frequent service restoration on weekdays. Service implemented December 2014. Trips added Saturdays for frequent service restoration in March 2015.

Section 2 -Route Designation Revisions to TriMet Code Chapter 22, Section 22.05 (Operative on September 13, 2015)

Revise “33-McLoughlin to 33- McLoughlin/King Rd”

Revise “34 -River Rd to 34-Linwood/River Rd”

Delete “28-Linwood”

Delete “31-King Rd”

Revise “154- Willamette to 154- Willamette/Clackamas Heights”

Revise “99 McLoughlin Express to 99-Macadam/McLoughlin”

Add – “MAX Orange Line”

Add – “291- Orange Night Bus”

II. Repeal of TriMet Code Chapter 20, Charter Rates

TriMet Code Chapter 20, Charter Rates, is deleted in its entirety as set forth below:

CHAPTER 20 – CHARTER RATES

~~20.05 **Charter Service.** Charter service shall be incidental to, and shall not interfere with, regularly scheduled mass transportation service and shall be in compliance with applicable state and federal law and regulations.~~

~~20.10 **Light Rail Charter Rates.** Light Rail Vehicle Charter Rates shall be as follows:~~

~~\$148 per hour for one-car train~~

~~\$237 per hour for two-car train~~

~~\$40 cleaning fee per car if food or drink is consumed on board, or if extensive decorations are involved~~

~~\$200 minimum charge~~

~~(20.10 amended by Ordinance No. 173)~~

~~20.15 **Bus Charter Rates.** Regular bus charter rates shall be as follows:~~

~~\$81 per hour~~

~~\$135 minimum charge~~

~~(20.15 amended by Ordinance No. 173)~~

~~20.20 **Charter Service Policy.** The following Statement of TriMet Charter Service Policy is hereby adopted to comply with the Charter Regulations of the Urban Mass Transportation Administration, 49 CFR, Part 604 (1982):~~

- ~~A. TriMet shall provide charter service for the people of the TriMet District only as authorized by state and federal law and regulation.~~
- ~~B. TriMet shall not provide charter service outside the TriMet District.~~
- ~~C. TriMet's primary function is to provide regularly scheduled mass transportation service. Charter service shall be incidental to the mass transportation service and shall be provided only during times of the day when vehicles are not needed for regularly scheduled service during peak hours, or where the charter is used for less than a total of six (6) hours in any one weekday.~~
- ~~D. TriMet charter service shall be considered supplementary to that of private bus operators for meeting the charter service needs of the District.~~
- ~~E. In establishing rates for charter service, TriMet shall comply with federal regulations for charter service. The rates shall be reviewed annually. The annual revenues generated by charter bus operations shall equal or exceed the annual cost of providing charter bus operations.~~
- ~~F. This statement of charter policy supersedes all prior charter policy statements.~~

Ordinance 339 Adopting Service Changes, Updating Route Designations and Amending TriMet Code Chapter 22, and Repealing TriMet Code Chapter 20, Charter Rates (First Reading)

General Counsel Shelley Devine read Ordinance 339 by title only – no action is necessary.

Neil McFarlane introduced Ordinance 339 and shared the major service changes proposed in conjunction with the opening of the Portland Milwaukie light rail line (Orange Line) with service between Clackamas County and downtown Portland via a new bridge over the Willamette River. At the March meeting, the conclusions of the Equity Analysis for the proposed service changes were presented to the Board. That report was also submitted to the FTA and we have not received any comments from the FTA.


President Warner stated that written comments on Ordinance 339 that have been received online and through the mail have been shared with the Board and comment cards completed today will be forwarded to all Board members and will become part of the formal Public Hearing record. If the Board is comfortable with the conclusions of the Equity Analysis, we will proceed to the public hearing on Ordinance 339.

No one spoke to the Board regarding Ordinance 339.

6. Other Business & Adjournment

There was no other business to come before the Board -- President Warner adjourned the meeting at 11:06 a.m.

Respectfully submitted,



Kelly Rannion, Recording Secretary

President Warner stated that the Board has seen the extensive community outreach that has been done, heard from community members, considered the Transit Equity Analysis, and is aware of the policy direction this Board has wanted to move forward, and asked for discussion on Ordinance 338.

Director Prosser stated there is never a good time to raise fares because there will always be legitimate concerns about raising fares for the most vulnerable part of our community. While it may look like we have a healthy bottom line, this is a critical time to build a fare structure that is equitable and sustainable over the long-term to provide and expand the service that is so needed and asked for throughout the region. Director Prosser stated that he is confident in the existing and the expanded mitigation that would assist the people who are most impacted and would allow us to move forward with providing and expanding the much needed service.

Director Stovall asked for clarification on Table 3 of the Transit Equity Analysis, community engagement, and the mitigation program.

Director Esmonde asked how many organizations are participating in the mitigation program – Johnell Bell responded over 85 and explained the outreach process.

President Warner stated that he agrees with Director Prosser that we need to look at the long-term and be very deliberate in our fare policies and maximize service while minimizing adverse impact. President Warner stated the importance of a broader community conversation in a holistic manner to balance increasing service with an equitable fare policy.

Director Stovall stated his concern that the Transit Equity Advisory Committee did not officially weigh in on this Ordinance and stated the importance of advisory committees to the Board vetting these important issues.

Action: Joe Esmonde moved approval of Ordinance 338; Travis Stovall seconded the motion.

The following roll call vote resulted in the approval of Ordinance 338:

Joe Esmonde.....	Yes
Shelley Martin.....	Abstained
T. Allen Bethel.....	Yes
Bruce Warner.....	Yes
Lori Irish Bauman.....	Abstained
Travis Stovall.....	Yes
Craig Prosser.....	Yes

Ordinance 339 Adopting Service Changes, Updating Route Designations and Amending TriMet Code Chapter 22, and Repealing TriMet Code Chapter 20, Charter Rates (Second Reading)

General Counsel Shelley Devine read Ordinance 339 by title only.

Neil McFarlane summarized the major service changes and explained the housekeeping change that would remove the provisions that dealt with charter rates because Federal rules do not allow us to provide charter service.

President Warner stated that the Board is aware of the extensive community outreach that has been done, considered the Transit Equity Analysis for Ordinance 339, and asked for discussion on Ordinance 339.

There was no Board discussion on Ordinance 339.

Action: Travis Stovall moved approval of Ordinance 339; T. Allen Bethel seconded the motion.

The following roll call vote resulted in the approval of Ordinance 339:

Craig Prosser.....	Yes
Travis Stovall.....	Yes
Lori Irish Bauman.....	Abstained
Bruce Warner.....	Yes
T. Allen Bethel.....	Yes
Shelley Martin.....	Abstained
Joe Esmonde.....	Yes

6. Other Business & Adjournment

Neil McFarlane addressed Joe Esmonde's concern about the timing of creating an internal team to recommend best technology for the Pedestrian Collision Warning system by Fall of 2016. Mr. McFarlane stated that while we do need to consider all we have on our plate right now with the Orange Line opening and emerging technologies, we agree that this technology is essential to our layer of safety for the overall system, so we will come back to the Board with a revised schedule and program to show the timing and pacing that would consider that.

President Warner adjourned the meeting at 12:38 p.m.

Respectfully submitted,



Kelly Rynnion, Recording Secretary

Attachment L

HONORED CITIZEN FARE INCREASE EQUITY ANALYSIS, WITH
DOCUMENTATION OF BOARD APPROVAL



Equity Analysis: Honored Citizen Fare Increase

Department of Diversity & Transit Equity

April 17, 2015

Updated May 20, 2015

Executive Summary: Honored Citizen Fare Increase Equity Analysis

In accordance with Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B, TriMet conducts an equity analysis any time fare changes are proposed to ensure that changes do not unfairly impact people of color and low-income populations. The proposal to increase Honored Citizen fares in September 2015 calls for such an analysis prior to the board taking action.

Methodology

TriMet's Title VI Program outlines the agency's Disparate Impact and Disproportionate Burden policies, as well as the way in which TriMet conducts fare equity analyses. In the case of the proposed Honored Citizen fare increase, the analysis aimed to answer two main questions:

1. Does increasing Honored Citizen fares (and only Honored Citizen fares) disproportionately impact minority and low-income riders?
2. Do the specifics of this fare increase proposal disproportionately impact minority and low-income Honored Citizens?

To answer these questions, staff utilized data from the most recent TriMet fare survey, conducted onboard in fall 2012.

Findings

Disparate Impact Analysis (Minority Riders)

The analysis found that minorities are underrepresented amongst Honored Citizens, meaning that increasing just Honored Citizen fares does not disproportionately impact minority riders. Additionally, minority and non-minority Honored Citizens use different fare products (e.g. single fares, monthly passes) at similar rates.

- Therefore, the proposal to increase single fares and monthly passes by different percentages does not present an apparent Disparate Impact.

Disproportionate Burden Analysis (Low-income Riders)

The analysis found that the specific structure of the fare increase proposal – to increase Honored Citizen single fares by \$0.25, monthly passes by \$2, and so on – does not disproportionately affect low-income Honored Citizens compared to higher income Honored Citizens. However, Honored Citizens as a whole are disproportionately low-income compared to other riders.¹

¹ **May 20, 2015 Update:** This finding and the analysis in support thereof have been corrected from the originally submitted final version of this report. The original version indicated that fares paid by low-income Honored Citizens were *more* likely

- Therefore, this proposal does present a potential Disproportionate Burden on low-income riders.

Alternatives to Address Findings

Per FTA, identification of a Disproportionate Burden calls for TriMet to “avoid, minimize, or mitigate impacts where practicable.” Avoiding the Disproportionate Burden would entail keeping Honored Citizen fares at their current levels. Assuming the fare increase will be adopted, below are three possible options to address the Disproportionate Burden identified (it is important to note that options 1 and 2 are not mutually exclusive):

Option 1: Minimize

TriMet could make an effort to increase utilization of 7-Day, 14-Day, and monthly Honored Citizen passes. These passes are proposed for smaller rates of increase than the single fare and 1-Day pass, and initial outreach has indicated that Honored Citizens may not be fully aware of the fare product options available to them. Also, the proposal maintains the Honored Citizen Downtown Pass with no cost increase, which provides a low-cost option for Honored Citizens living within the downtown core.

Option 2: Mitigate

TriMet could build upon its current Access Transit Program by:

- Increasing the budget and targeting the increase towards serving Honored Citizens;
- Increasing the discount participating agencies receive on Honored Citizen fares; and
- Adding Honored Citizen fares to those set aside for short-term fare relief.

Option 3: No additional action

TriMet could adopt the Honored Citizen fare increase as planned without addressing the impacts identified in this analysis. This would require a rationale for why avoiding, minimizing, and/or mitigating for the Disproportionate Burden is not practicable from the agency’s standpoint.

to be single fares than fares paid by higher income Honored Citizens, when in fact the data shows the opposite to be true. Tables 5-6 and Figures 6-7 in this report have been updated to reflect this.

I. Background

TriMet is proposing an increase to Honored Citizen fares, which allow seniors and people with disabilities to ride TriMet at a reduced rate. The agency has not raised Honored Citizen fares since 2010, even while increasing other fares in order to meet budget shortfalls. During this same period, some Adult single fares increased 22%, with Adult monthly passes increasing as much as 29%. TriMet also agreed to implement the recommendation from the Committee on Accessible Transportation (CAT) to hold Honored Citizen fares flat while increases to LIFT paratransit fares were phased in, which was accomplished in 2014. The fare increase as proposed would maintain consistency with FTA guidelines and restore Honored Citizen fares to the historical level of one-half the adult fare, which had been TriMet’s prior practice, and simplify the fare structure by aligning Honored Citizen and Youth fares. It would also help TriMet maintain and expand service to meet the transit needs of a growing elderly population.

As a recipient of Federal financial assistance, TriMet must ensure that fare changes comply with Title VI of the Civil Rights Act of 1964, which states:

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

The FTA has provided specific implementing guidelines and regulations for complying with Title VI in Circular 4702.1B (“Circular”). Due to the interrelated nature of race/ethnicity and income, the Circular instructs transit agencies to consider impacts on low-income populations as well as minority populations; the assessment of potential Title VI issues related to fare changes is completed through a fare equity analysis. Figure 1 shows the sequence of steps and considerations in the equity analysis process.

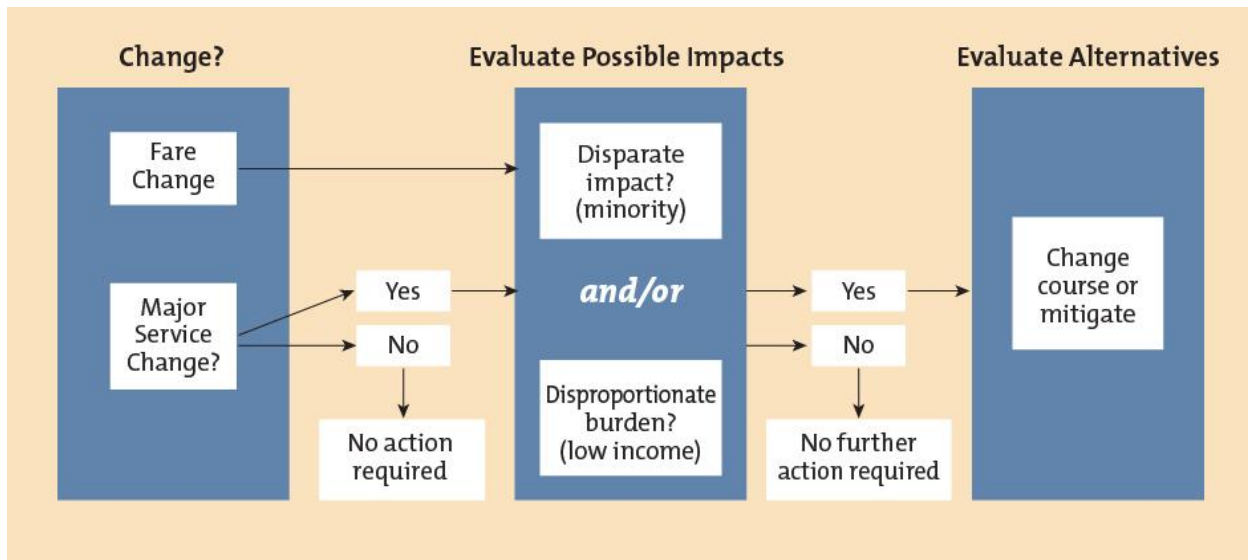


Figure 1: Overview of Title VI Equity Analysis

II. TriMet Title VI Compliance

In the fall of 2013, TriMet updated its Title VI Program, which received concurrence by the Federal Transit Administration (FTA) in January 2014. The program outlines agency policies, definitions and procedures for complying with Title VI and performing equity analyses. This includes the agency's fare change, Disparate Impact, and Disproportionate Burden policies.

A. Disparate Impact Policy

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

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.

B. Disproportionate Burden Policy

Testing for Disproportionate Burden evaluates potential effects on low-income populations. The analysis is identical to that used to determine potential Disparate Impacts, but comparing low-income – defined as at or below 150% of the federal poverty level – and higher income rather than minority and non-minority populations. Higher income includes all those above 150% of the federal poverty level.

III. Proposed Fare Changes for Fall 2015

A. Description of Changes

TriMet is proposing changing pricing of Honored Citizen fares, effective September 1, 2015. The current and proposed fares by fare type are shown in Table 1. The change would bring the Single Fare and the 1-day Pass for Honored Citizens up to half the Adult price; FTA requires fixed route transit providers to offer fares to seniors and people with disabilities (Honored Citizens) at no more than half the full (Adult) fare. All other products – the 7-day Pass, 14-day Pass, Monthly/30-day Pass, and Annual Pass – would increase, but would remain substantially less than half the Adult price. Fares for Honored Citizens would align with Youth fares after the increase.

Honored Citizens take about 14% of TriMet system rides on weekdays, and 17% on weekends. To be eligible for Honored Citizen fares, riders must be 65 years or older, be on Medicare, or have a disability. Honored Citizen fares have remained at the same level since 2010, while Adult tickets and passes have seen several increases over that period.

Table 1: Proposed Honored Citizen fare changes and Adult fares

	Honored Citizen		Adult
	Current Fare	New Fare	Current Fare
Single Fare (cash/ticket)	\$1.00	\$1.25	\$2.50
1-day Pass	\$2.00	\$2.50	\$5.00
7-day Pass	\$7.00	\$7.50	\$26.00
14-day Pass	\$13.50	\$14.50	\$51.00
Monthly/30-day Pass	\$26.00	\$28.00	\$100.00
Annual Pass	\$286.00	\$308.00	\$1,100.00

B. Disparate Impact Analysis

The 2012 TriMet on-board Fare Survey (survey instrument attached in Appendix A) collected fare payment and demographic data necessary to conduct a fare equity analysis consistent with the policies described in Section II of this report.

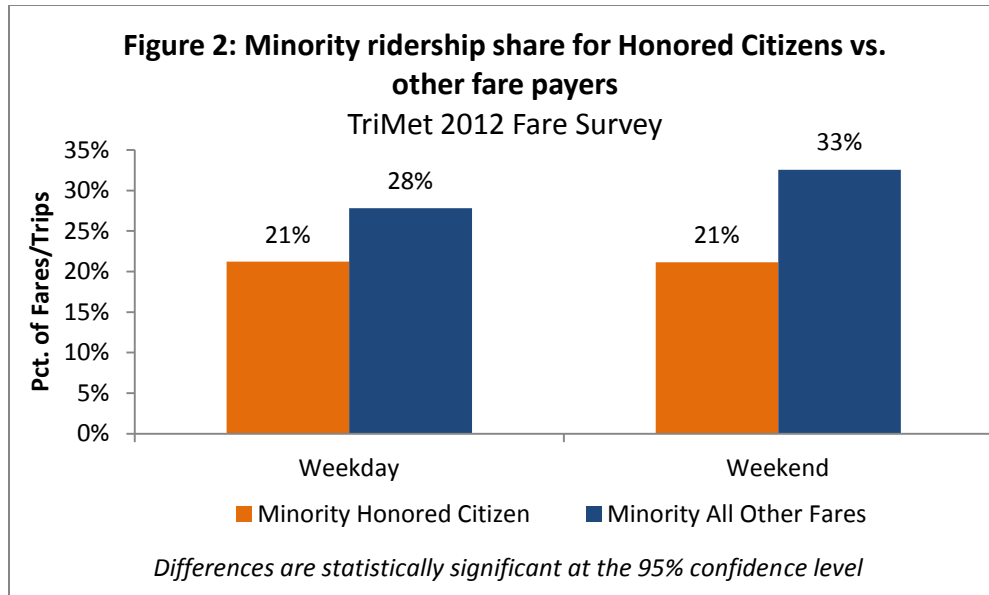
The first level of the Disparate Impact analysis is a determination of how Honored Citizens compare to other riders in terms of racial/ethnic minority status. As shown in Table 2 and Figure 2, the share of trips taken by minority riders is lower among Honored Citizens than others. For example, while minority riders take 21% of all Honored Citizen trips on weekdays, they take 28% of all *non*-Honored Citizen trips on weekdays. The difference is even greater on weekends. In other words, Honored Citizens are less likely to be minorities than other riders, based on their use of the TriMet system. This indicates that increases to Honored Citizen fares overall would not disproportionately impact minority riders.

Table 2: Comparison of minority status for Honored Citizens and all others
TriMet 2012 Fare Survey

	Weekdays ¹		Weekends ¹	
	Honored Citizen Trips (n=613) ²	All Other Trips (n=3,976)	Honored Citizen Trips (n=544)	All Other Trips (n=2,712)
Minority	21%	28%	21%	33%
Non-minority	79%	72%	79%	67%
Total	100%	100%	100%	100%

¹Differences between column pairs are statistically significant at the 95% confidence level.

²n's indicate weighted number of survey responses



Since different fares are proposed to increase by different percentages, the next level of analysis looks at the degree of increase by fare type to see whether that leads to any potential disparities. Table 3 and Figures 3-4 display this information for both weekdays and weekends, and the data indicates that minorities and non-minorities are about as likely as each other to use each individual Honored Citizen fare type – with the exception of Honored Citizen Downtown Pass. The Downtown Pass is used more for trips taken by minority riders; because the \$10 administrative fee for the pass is not being proposed for an increase, this does not indicate a potential Disparate Impact.

Table 3: Proposed Honored Citizen fare changes and usage by race/ethnicity
2012 TriMet Fare Survey

Fare media	Current Fare	New Fare	Fare change Pct.	Weekdays		Weekends	
				Pct. of Non-minority Trips (n=461) ¹	Pct. of Minority Trips (n=118)	Pct. of Non-minority Trips (n=410)	Pct. of Minority Trips (n=112)
HC Single fare (cash or ticket)	\$1.00	\$1.25	+25%	25%	25%	29%	27%
HC 1-Day Pass	\$2.00	\$2.50	+25%	5%	8%	9%	4%
HC 7-Day Pass	\$7.00	\$7.50	+7%	0%	2%	0%	0%
HC 14-Day Pass	\$13.50	\$14.50	+7%	1%	2%	1%	2%
HC Monthly/30-Day Pass	\$26	\$28	+8%	57%	47%	46%	43%
HC Annual Pass	\$286	\$308	+8%	3%	1%	1%	1%
HC Downtown Pass²	\$10	\$10	0%	9%	17%	13%	23%
Total				100%	100%	100%	100%

¹n's indicate weighted number of survey responses

²The HC Downtown Pass cost is an administrative fee, and not a fare. The pass is good for two years.

Bold = statistically significant difference between minority & non-minority trips at 95% confidence level

Figure 3: Weekday fare payment type by minority & non-minority Honored Citizens

TriMet 2012 Fare Survey

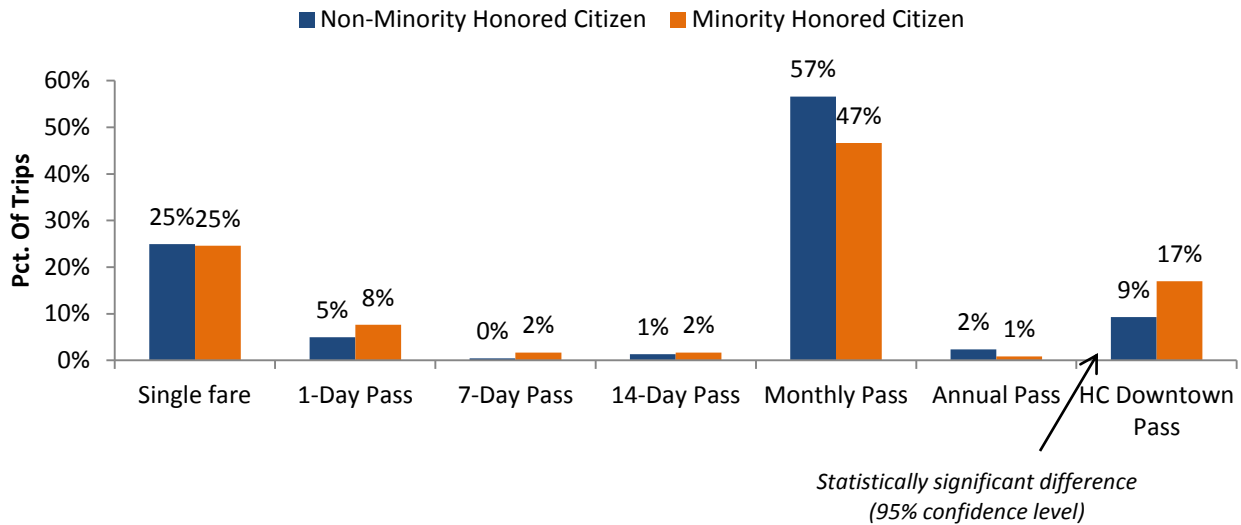
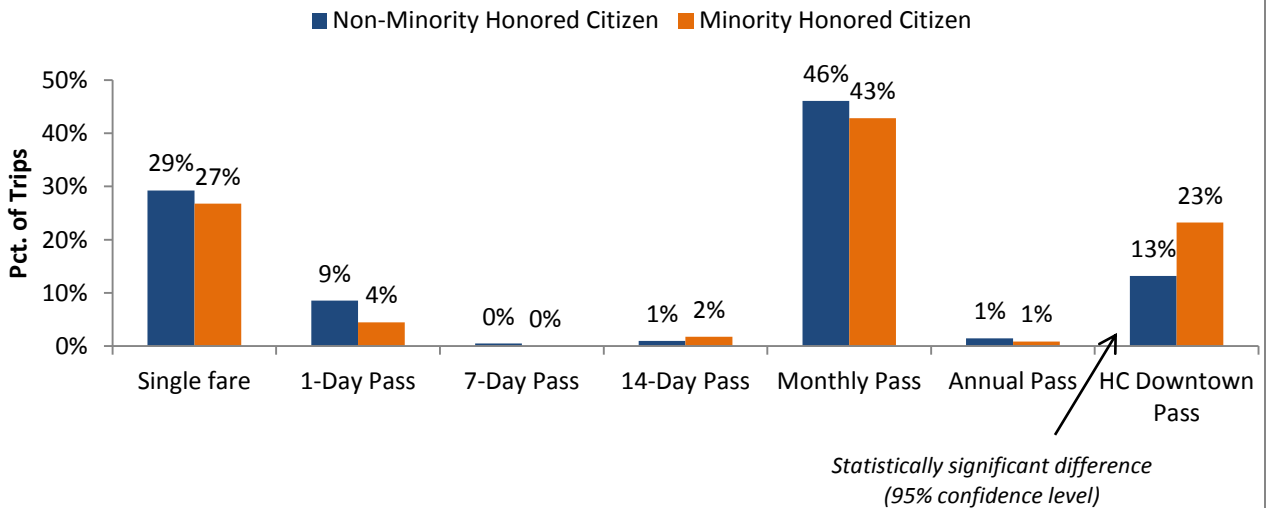


Figure 4: Weekend fare payment type by minority and non-minority Honored Citizens

TriMet 2012 Fare Survey



➤ Thus, given the available data, TriMet finds no potential Disparate Impact on minority populations under this proposal to increase Honored Citizen fares.

C. Disproportionate Burden Analysis

Similar to the Disparate Impact analysis, the first level of the Disproportionate Burden analysis is a determination of how Honored Citizens compare to other riders in terms of low-income status. Low-income is defined as at or below 150% Federal Poverty Level, and higher income is defined as all others. As shown in Table 4 and Figure 5, the share of trips taken by low-income riders is higher among Honored Citizens than others. For example, while low-income riders take 63% of all Honored Citizen trips on weekdays, they take 39% of all *non*-Honored Citizen trips on weekdays. The difference is not as great on weekends, but still meets the standard of a statistically significant difference. In other words, Honored Citizens are more likely to be low-income than other riders, based on their ridership. This indicates that increases to Honored Citizen fares overall would disproportionately and adversely affect low-income riders.

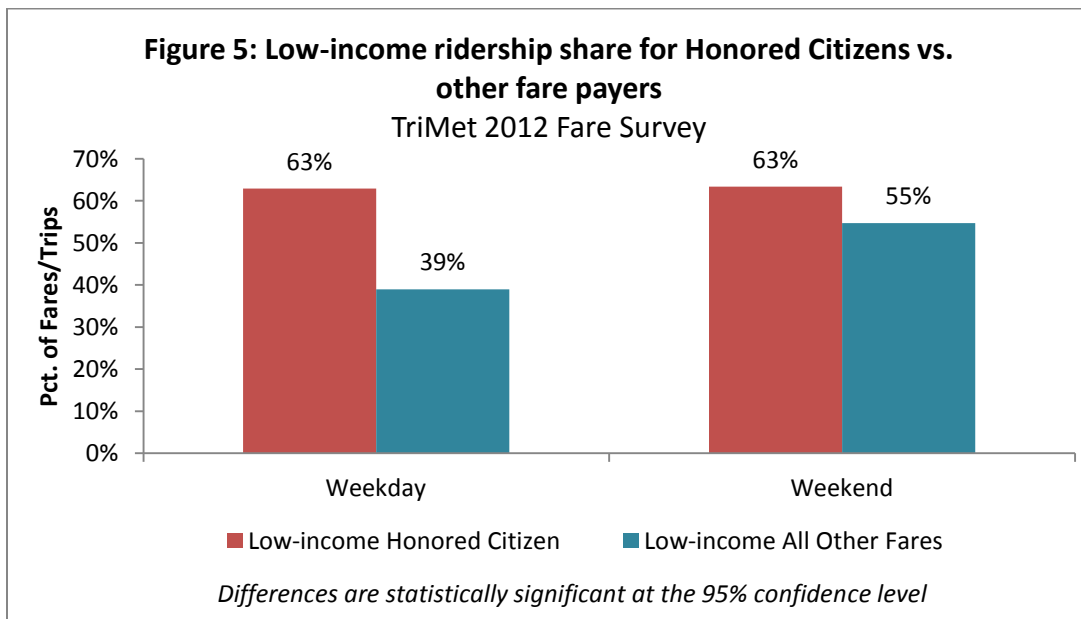
Table 4: Comparison of low-income status for Honored Citizens and all others
TriMet 2012 Fare Survey

	Weekdays ¹		Weekends ¹	
	Honored Citizen Trips (n=563) ²	All Other Trips (n=3,379)	Honored Citizen Trips (n=320)	All Other Trips (n=1,245)
Low-income³	63%	39%	63%	55%
Higher Income	37%	61%	37%	45%
Total	100%	100%	100%	100%

¹Differences between columns are statistically significant at the 95% confidence level.

²n's indicate weighted number of survey responses.

³Low-income defined as at or below 150% federal poverty; Higher income is all others.



Since different fares are proposed to increase by different percentages, the next level of analysis looks at the degree of increase by fare type to see whether that leads to any potential disparities. Table 5 and Figures 6-7 display this information, and indicate that on both weekdays and weekends, low-income Honored Citizen fares are less likely to be single fares (cash or ticket) than higher income Honored Citizen fares. On weekends only, low-income Honored Citizens utilize the monthly pass and HC Downtown Pass more than higher income Honored Citizens.

Thus, the analysis finds no potential disproportionate and adverse effects on low-income riders because:

- a. Honored Citizen single fares are proposed for the highest percentage increase, and
- b. Fares paid by low-income Honored Citizens are less likely to be single fares than fares paid by higher income Honored Citizens².

Table 5: Proposed fare changes and usage by income status
2012 TriMet Fare Survey

Fare media	Current Fare	New Fare	Fare change Pct.	Weekdays		Weekends	
				Pct. of Low-income Trips (n=349) ¹	Pct. of Higher Income Trips (n=184)	Pct. of Low-income Trips (n=315)	Pct. of Higher Income Trips (n=169)
HC Single fare (cash or ticket)	\$1.00	\$1.25	25%	22%	30%	24%	38%
HC 1-Day Pass	\$2.00	\$2.50	25%	6%	7%	6%	8%
HC 7-Day Pass	\$7.00	\$7.50	7%	0%	1%	0%	1%
HC 14-Day Pass	\$13.50	\$14.50	7%	1%	2%	1%	2%
HC Monthly/30-Day Pass	\$26	\$28	8%	56%	47%	50%	39%
HC Annual Pass	\$286	\$308	8%	2%	3%	1%	2%
HC Downtown Pass²	\$10	\$10	0%	13%	10%	17%	11%
Total				100%	100%	100%	100%

¹n's indicate weighted number of survey responses.

²The HC Downtown Pass cost is an administrative fee, and not a fare. The pass is good for two years.

Bold = statistically significant difference between low-income and higher income trips at 95% confidence level

² **May 20, 2015 Update:** This finding and the analysis in support thereof have been corrected from the originally submitted final version of this report. The original version indicated that fares paid by low-income Honored Citizens were *more* likely to be single fares than fares paid by higher income Honored Citizens, when in fact the data shows the opposite to be true. Tables 5-6 and Figures 6-7 have been updated to reflect this.

Figure 6: Weekday fare payment type by low-income and higher income Honored Citizens
TriMet 2012 Fare Survey

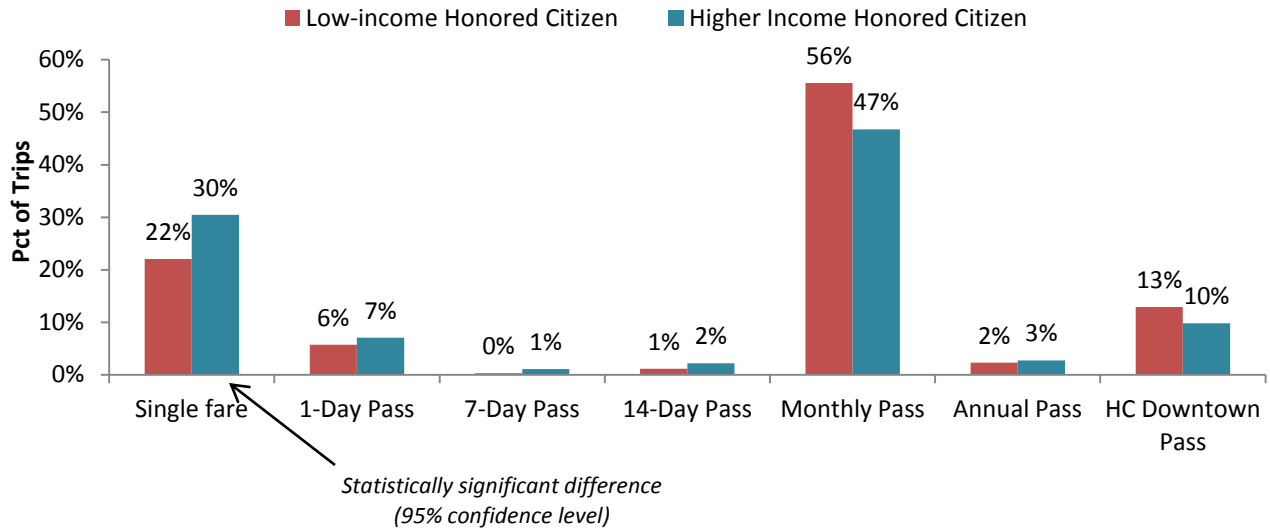
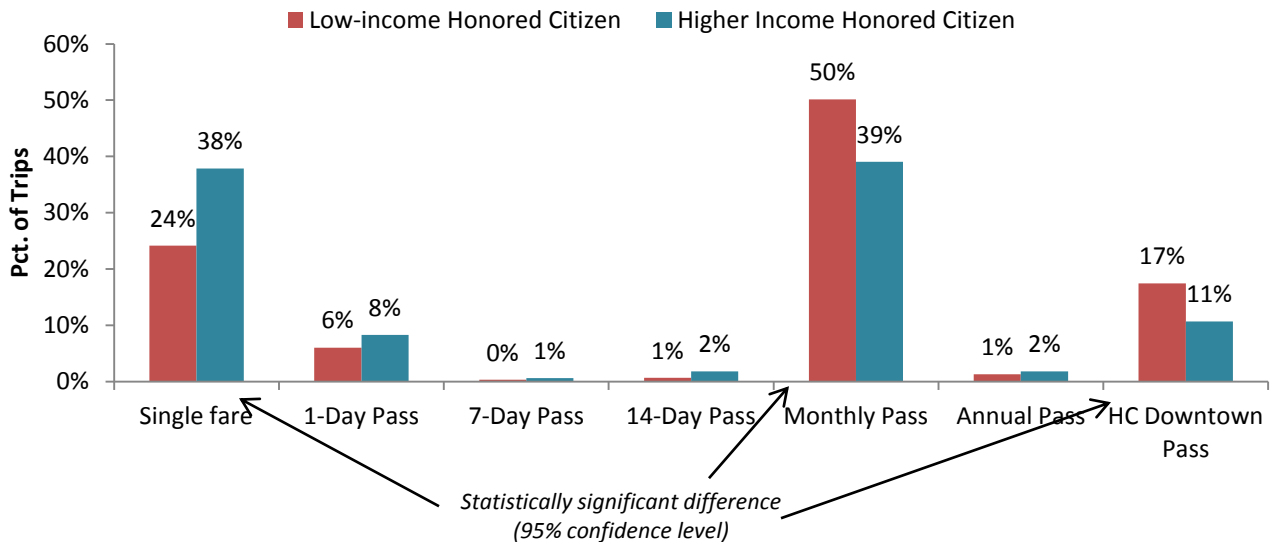


Figure 7: Weekend fare payment type by low-income and higher income Honored Citizens
TriMet 2012 Fare Survey



➤ Thus, given the available data, TriMet finds a potential Disproportionate Burden on low-income populations under the proposal to increase Honored Citizen fares.

D. Summary of Findings

A summary of the results of the Disparate Impact and Disproportionate Burden analyses is shown in Table 6. The proposal to increase Honored Citizen fares, and not fares for other riders, does not appear to have any Disparate Impacts on minority riders. Additionally, the specific proposal to increase single fares by \$0.25, monthly passes by \$2, and so on would not disproportionately affect minority Honored Citizens.

On the other hand, increasing Honored Citizen fares while not increasing fares for other riders presents a potential Disproportionate Burden on low-income Honored Citizens. However, the specific proposal to increase single fares by \$0.25, monthly passes by \$2, and so on would not disproportionately affect low-income Honored Citizens. While noting that Honored Citizen fares have not increased in five years, while Adult fares have, this finding nevertheless suggests TriMet should attempt to avoid, minimize, or mitigate the disproportionate impacts of the Honored Citizen fare increase.

Table 6: Summary of Disparate Impact and Disproportionate Burden analyses

	Potential Disparate Impact?	Potential Disproportionate Burden?
Increasing Honored Citizen fares only	No	Yes
Structure of fare increase	No	No ³

IV. Alternatives to Address Findings

The findings of this analysis prompt TriMet to consider possible measures to avoid, minimize, and/or mitigate the Disproportionate Burden on low-income riders. Avoiding the Disproportionate Burden would entail keeping Honored Citizen fares at their current levels. Under the assumption that the TriMet Board adopts the fare increase, the following options could be considered to address identified impacts.

Option 1: Minimize disproportionate impacts

The specifics of the fare increase proposal are meant to minimize impacts as much as possible, while bringing the Honored Citizen fare to the FTA guideline of half the adult fare. Continuing to offer the Honored Citizen Downtown Pass at the same cost (a \$10 administrative fee) helps those who live within the downtown area, many of whom are low-income and access a variety of services located there. Additionally, the smaller increase to annual, monthly, bi-weekly, and weekly passes means that the majority of Honored Citizens – low-income and higher income alike – would not experience as significant a rise in costs.

³ **May 20, 2015 Update:** Corrected from originally submitted final report. See footnote 1 on page ES-1, and footnote 2 on page 7.

A point to note from the data is that utilization of 7-day and 14-day Honored Citizen passes is relatively small. TriMet could make an effort to determine whether this is due to lack of product awareness, and if so to market these passes as a way for Honored Citizens currently using single fares and day passes to save money.

Option 2: Mitigate disproportionate impacts

In order to help offset fare increases adopted in 2012, TriMet established a Low-income Fare Mitigation program, now called Access Transit. This program has two components:

Fare Assistance Program

Provides a discount applied to the purchase of tickets and passes to qualifying non-profit organizations and government agencies who serve low-income clients. Participating organizations must provide fare administration services for TriMet, and distribute purchased fares to their clients either at no cost, or at a cost no higher than the discounted rate. Most organizations do not charge clients for fares.

Fare Relief Program

Provides tickets and passes in the form of fare grants to qualifying non-profit organizations who serve low-income clients. Participating organizations then distribute at no cost to their clients. This program also includes a Short-term Fare Relief component, wherein persons not connected to a participating organization can receive temporary assistance directly.

To mitigate a disproportionate burden, TriMet could engage in any of the following possible strategies:

- Increase Access Transit Program funds. These funds would be earmarked specifically for organizations who serve low-income older adults and people with disabilities.
- Increase the Fare Assistance discount for Honored Citizen fares.
- Conduct targeted outreach to community organizations to boost awareness of the Access Transit Programs, especially those that focus on serving senior citizens and/or people with disabilities. This could increase the network of participating organizations that are able to provide assistance to individuals. Continue to improve transit service for seniors and/or people with disabilities, many of whom live in the outlying areas of the district due to the availability of affordable housing.
- Once electronic eFare is in place allow Honored Citizen riders a monthly pass discount that allows them to buy a monthly pass one day at a time.

Option 3: Take no additional action

TriMet could adopt the Honored Citizen fare increase as planned without addressing the impacts identified in this analysis. This would require a rationale for why avoiding, minimizing, and/or mitigating for the Disproportionate Burden is not practicable from the agency's standpoint.

V. Community Engagement

TriMet discussed the fare increase proposal with key stakeholders and community members. These discussions focused on both the increase itself, as well as possible ways to mitigate for its impacts on low-income populations. The following provides a summary of activities conducted leading up to the TriMet Board's decision on whether to adopt the increase, and beyond if it is adopted.

Committee on Accessible Transportation (CAT)

TriMet staff presented the fare increase proposal to the Committee on Accessible Transportation (CAT) on January 21, 2015, and met with the CAT Executive Committee on two other occasions to discuss the proposal in greater detail. The CAT Executive Committee recognizes the need to resume increases in Honored Citizen fares, as fare levels have remained flat since 2010, while adult fares have increased as much as 45 cents for a single ticket during this time. They also acknowledge that continuing to delay fare increases poses challenges to keeping up with service costs and meeting the transit needs of the growing population of seniors and people with disabilities. The CAT Executive Committee has submitted a letter in support of the fare increase, and to help offset the impact of the increase, has recommended implementing the mitigation strategy outlined previously.

The Committee also recommended giving priority to improving transit service in the outer areas of the TriMet district, including complementary LIFT paratransit service, where more and more low-income individuals are now forced to live due to the availability of affordable housing.

Transit Equity Advisory Committee (TEAC)

TriMet's Transit Equity Advisory Committee reviewed the Honored Citizen fare increase proposal, the analysis results presented here, and some mitigation alternatives at its monthly meeting on February 19, 2015. A point of focus for the Committee was outreach to communities of color, due to the finding that people of color are under-represented amongst Honored Citizens. While this leads to a finding of no Disparate Impact related to the fare increase, it also indicates that older adults and people with disabilities who are also of color are not accessing the discounted Honored Citizen fares as much as others. One strategy identified by TEAC to help address this may be engaging in targeted marketing of the availability of Honored Citizen fares.

TEAC also emphasized that not all Honored Citizens are connected to community-based organizations, and therefore may not benefit from increases to the Access Transit program. Thus, in addition to expanding Access Transit, TEAC felt that TriMet should find ways to provide direct assistance to low-income Honored Citizens in order to mitigate for the fare increases.

Stakeholder Roundtable

On March 5, 2015 TriMet staff hosted a roundtable discussion with representatives of organizations serving older adults and people with disabilities. Staff presented the fare increase proposal and possible mitigation strategies, asking for feedback from the participants (many of whom currently participate in TriMet's Access Transit program). Attendees had concerns about the fare increase overall. Several questioned raising Honored Citizen fares at all and encouraged TriMet to drop the proposal to increase Honored Citizen fares at this time. It was understood that doing so would eliminate the potential for disproportionate impacts on low-income riders, but would also prevent TriMet from achieving the objectives of simplifying the fare structure and returning the Honored Citizen fare to historical parity, thus furthering its commitment to improving service and financial stewardship.

In regards to the mitigation options, stakeholders pointed to the difficulty older adults and people with disabilities have accessing systems and institutions, and that this may present a barrier to adequately mitigating for the impacts of the increase on low-income Honored Citizens under the possible mitigations outlined in Section IV of this report. In response, the mitigation options were modified to include adding Honored Citizen fares to those set aside for short-term fare relief. These fares are accessed directly by riders in need, even if they are not connected to a participating community-based organization.

APPENDIX A: Fall 2012 TriMet on-board fare survey questionnaire

TriMet Rider Survey

Please fill out this form even if you have already received one on another bus or train.

Dear Rider: TriMet would like to know about the trip you are currently making. Please answer the following questions and return to the surveyor or drop it in the mail.

1. What line are you riding on now? Line # _____ Line name _____	
2. Do you have to transfer to or from a different line to make this trip in one direction? <input type="checkbox"/> 01 No <input type="checkbox"/> Yes. If Yes, how many times? <input type="checkbox"/> 02 1 time <input type="checkbox"/> 03 2 times <input type="checkbox"/> 04 3 or more times	
3. If you must transfer to make this trip, what lines do you transfer to or from? (not including the bus or train you are on now) Line # _____ Line name _____ Line # _____ Line name _____ <input type="checkbox"/> 01 MAX <input type="checkbox"/> 02 WES <input type="checkbox"/> 03 Portland Streetcar <input type="checkbox"/> 04 C-TRAN route # _____ <input type="checkbox"/> 05 SAM Transit _____	
4. How did you pay your fare for this trip? (check one) <input type="checkbox"/> 01 TriMet fare <input type="checkbox"/> 02 C-TRAN fare <input type="checkbox"/> 03 Portland Streetcar fare If Streetcar, which type of fare? <input type="checkbox"/> 04 2-Hour Ticket (\$1) <input type="checkbox"/> 05 Portland Streetcar Annual Pass (\$150)	
5. Which TriMet fare? (Please check one)	
	<input type="checkbox"/> 01 CASH (2-Hr Ticket) <input type="checkbox"/> 02 TICKET (Book of 10) <input type="checkbox"/> 03 1-DAY PASS <input type="checkbox"/> 04 7-DAY PASS <input type="checkbox"/> 05 14-DAY PASS <input type="checkbox"/> 06 MONTHLY/30-Day PASS <input type="checkbox"/> 07 ANNUAL PASS
Adult	<input type="checkbox"/> 01 \$2.50 <input type="checkbox"/> 02 \$25.00 <input type="checkbox"/> 03 \$5.00 <input type="checkbox"/> 04 \$26.00 <input type="checkbox"/> 05 \$51.00 <input type="checkbox"/> 06 \$100.00 <input type="checkbox"/> 07 \$1,100.00
Youth/Student	<input type="checkbox"/> 02 \$1.65 <input type="checkbox"/> 02 \$16.50 <input type="checkbox"/> 02 \$3.30 <input type="checkbox"/> 02 \$ 8.00 <input type="checkbox"/> 02 \$15.50 <input type="checkbox"/> 02 \$ 30.00 <input type="checkbox"/> 02 \$ 330.00
Honored Citizen/STAR	<input type="checkbox"/> 03 \$1.00 <input type="checkbox"/> 03 \$10.00 <input type="checkbox"/> 03 \$2.00 <input type="checkbox"/> 03 \$ 7.00 <input type="checkbox"/> 03 \$13.50 <input type="checkbox"/> 03 \$ 26.00 <input type="checkbox"/> 03 \$ 286.00
LIFT	<input type="checkbox"/> 04 \$2.15 <input type="checkbox"/> 04 \$21.50 <input type="checkbox"/> 04 \$31.50 <input type="checkbox"/> 04 \$ 62.00 <input type="checkbox"/> 04 \$ 682.00
<input type="checkbox"/> 05 Employee ID with TriMet sticker <input type="checkbox"/> 06 College ID with TriMet sticker <input type="checkbox"/> 07 High school ID with TriMet sticker and/or embedded with TriMet logo <input type="checkbox"/> 08 Honored Citizen Downtown Pass <input type="checkbox"/> 09 Other _____	
6. Is your single-fare payment being used for a one-way or a round-trip? <input type="checkbox"/> 01 One-way trip <input type="checkbox"/> 02 Round-trip	
7. If you are using a 1-Day Pass, how many one-way trips will you make on it today? _____	
8. Where did you buy your fare for this trip?	
<input type="checkbox"/> 01 Onboard the bus <input type="checkbox"/> 02 Ticket Vending Machine <input type="checkbox"/> 03 TriMet Ticket Office <input type="checkbox"/> 04 Retail Store	<input type="checkbox"/> 05 Pass by Mail <input type="checkbox"/> 06 School or Place of Employment <input type="checkbox"/> 07 Online <input type="checkbox"/> 08 Purchased on Streetcar
<input type="checkbox"/> 09 Social Service Agency Purchased for me <input type="checkbox"/> 10 Other _____	
9. Do you have a vehicle you could have used to make this trip either as the driver or as a passenger? <input type="checkbox"/> 01 Yes <input type="checkbox"/> 02 No	
10. Do you have a checking or savings account? <input type="checkbox"/> 01 Yes <input type="checkbox"/> 02 No	
11. Do you have or use a pre-paid or regular debit or credit card?	
<input type="checkbox"/> 01 Yes (check all that apply) <input type="checkbox"/> 02 Pre-paid card <input type="checkbox"/> 03 Bank-issued debit card <input type="checkbox"/> 04 Bank-issued credit card	<input type="checkbox"/> 05 No
12. Including yourself, how many people live in your household? _____	
13. How many trips have you taken on a TriMet bus/MAX in the last month? (count each direction as one trip) _____	
14. What is your age? _____	
15. Are you a college student? <input type="checkbox"/> 01 Yes, full-time <input type="checkbox"/> 02 Yes, part-time <input type="checkbox"/> 03 No	
If you are a college student, which college?	<input type="checkbox"/> 01 PSU <input type="checkbox"/> 02 PCC <input type="checkbox"/> 03 Other _____
16. Are you: (check one)	
<input type="checkbox"/> 01 Asian/Pacific Islander <input type="checkbox"/> 02 African American/Black	<input type="checkbox"/> 03 Caucasian/White <input type="checkbox"/> 04 Hispanic/Latino <input type="checkbox"/> 05 Multi-racial/bi-racial <input type="checkbox"/> 06 Native American Indian <input type="checkbox"/> 07 Other _____
17. What was your total annual household income before taxes in 2011? (check one)	
<input type="checkbox"/> 01 Under \$10,000 <input type="checkbox"/> 02 \$10,000 to \$19,999	<input type="checkbox"/> 03 \$20,000 to \$29,999 <input type="checkbox"/> 04 \$30,000 to \$39,999 <input type="checkbox"/> 05 \$40,000 to \$49,999 <input type="checkbox"/> 06 \$50,000 to \$59,999 <input type="checkbox"/> 07 \$60,000 to \$69,999 <input type="checkbox"/> 08 \$70,000 or more <input type="checkbox"/> 09 Don't know
18. Do you speak a language other than English at home? <input type="checkbox"/> 01 Yes If yes, what language is this? _____ <input type="checkbox"/> 02 No	
Quý vị có nói một ngôn ngữ nào khác ngoài tiếng Anh ở nhà không? 除了英文外，您在家還說其他的語言嗎？ Разговариваете ли вы на каком-либо еще языке, кроме английского, дома? 집에서 영어가 아닌 다른 언어를 사용하십니까?	<input type="checkbox"/> 05 Có <input type="checkbox"/> 06 Không <input type="checkbox"/> 07 是 <input type="checkbox"/> 08 否 <input type="checkbox"/> 09 Да <input type="checkbox"/> 10 Нет <input type="checkbox"/> 11 예 <input type="checkbox"/> 12 아니오
19. How well do you speak English?	
Quý vị nói tiếng Anh khá không? 您說英文的程度如何？ Как хорошо вы разговариваете на английском языке? 영어로 어느 정도로 잘 구사하십니까?	<input type="checkbox"/> 01 Very well <input type="checkbox"/> 02 Well <input type="checkbox"/> 03 Not well <input type="checkbox"/> 04 Not at all <input type="checkbox"/> 09 Rất khá <input type="checkbox"/> 10 Khá <input type="checkbox"/> 11 Không khá <input type="checkbox"/> 12 Không nói được <input type="checkbox"/> 13 非常好 <input type="checkbox"/> 14 好 <input type="checkbox"/> 15 好 <input type="checkbox"/> 16 一點都不會 <input type="checkbox"/> 17 Очень хорошо <input type="checkbox"/> 18 Достаточно хорошо <input type="checkbox"/> 19 Не очень хорошо <input type="checkbox"/> 20 Вообще не говорю <input type="checkbox"/> 21 대단히 잘한다 <input type="checkbox"/> 22 잘한다 <input type="checkbox"/> 23 잘하지 못한다 <input type="checkbox"/> 24 전혀 하지 못한다

Please return to surveyor or fold, tape 1" from each edge and mail postage-paid. Thank you for taking time to fill out this survey.

Date: May 27, 2015

To: Board of Directors

From: Neil McFarlane *Neil McFarlane*

Subject: **ORDINANCE NO. 338 OF THE TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET) ADOPTING HONORED CITIZEN FARE INCREASES, AND AMENDING TRIMET CODE CHAPTER 19 (SECOND READING)**

1. Purpose of Item

Ordinance No. 338 amends TriMet Code Chapter 19 to adopt increases to Honored Citizen fares. The fare changes would become operative on September 1, 2015, and are further described in Section 5, Background.

2. Type of Agenda Item

- Initial Contract
- Contract Modification
- Other: Ordinance

3. Reason for Board Action

The TriMet Code may be amended only by adoption of an ordinance. Adoption of Ordinance No. 338 requires two readings.

4. Type of Action:

- Resolution
- Ordinance 1st Reading
- Ordinance 2nd Reading
- Other

5. Background

TriMet regularly reviews fares to ensure fare levels are appropriate and keep pace with the cost of operating the transit system. Fare adjustments attempt to balance affordable fares with the need to generate revenues and serve a growing number of riders. Honored Citizen fares, available for seniors age 65 or older, people with disabilities, and Medicare card holders, last increased in 2010. Ordinance No. 338 proposes to increase Honored Citizen fares by 25 cents for a single ticket and \$2 for a monthly pass, with other Honored Citizen fares increasing by a commensurate amount, effective September 1, 2015. The details of the proposal are provided below in Section 6. Financial/Budget Impact.

TriMet has not raised Honored Citizen fares since 2010, even while other fares have increased in order to meet budget requirements. During this period, some Adult single ticket fares have

increased 22%, with Adult monthly passes increasing by as much as 29%. TriMet agreed to implement the recommendation from the Committee on Accessible Transportation (CAT) to hold Honored Citizen fares flat while increases to LIFT paratransit fares were phased in over a three-year period, which was accomplished in 2014.

The proposed fare increase would: 1) maintain consistency with Federal Transit Administration (FTA) guidelines and restore Honored Citizen fares to the historical level of one-half the adult fare, 2) simplify the fare structure by aligning Honored Citizen and Youth fares, and 3) help TriMet maintain and expand service to meet the transit needs of a growing elderly population.

The State of Oregon estimates that by the year 2025, the percent of the population age 65+ in the tri-county area will grow to 16 percent, up from 10 percent in 2010. As part of TriMet's Service Enhancement Planning process, the agency is looking at where to deploy service increases that support mobility for seniors and people with disabilities, particularly as the availability of affordable housing shifts away from the central city.

A. Committee on Accessible Transportation (CAT)

The TriMet full CAT, and the CAT Executive Committee met to discuss the details of the proposal several times. At the TriMet Board of Directors (Board) meeting on March 25, 2015, the CAT submitted a letter in support of the proposal to increase Honored Citizen fares and recommended the following strategies to help offset the impact of the fare increase: 1) increase funding for Access Transit programs that provide fare assistance to community organizations that serve low-income seniors and people with disabilities; 2) collaborate with partners to improve access to these programs to ensure organizations that serve senior citizens and/or people with disabilities are aware of the fare assistance programs; and 3) prioritize improving transit service in the outer areas of the TriMet district, including complementary LIFT paratransit service, where more and more low-income individuals are now living due to the availability of affordable housing.

B. Title VI Fare Equity Analysis

In accordance with Federal Transit Administration (FTA) Title VI Circular 4702.1B implementing Title VI of the Civil Rights Act, TriMet must assess proposed fare changes to identify potential disproportionate impacts on low-income and minority populations.

A Title VI fare change equity analysis ("Report"), was conducted which evaluated potential *adverse effects* and analyzed whether there are *disparate impacts* that fall on minority populations more than on others, and whether there are *disproportionate burdens* on low-income riders. Preliminary findings were presented to the Board for their consideration at their March 25, 2015 meeting. The Board was provided the final Report dated April 17, 2015 prior to the April 22, 2015 meeting. The final Report was clarified, as noted below, and resubmitted to the Board prior to the May 27, 2015 Board meeting.

In summary, the Honored Citizen fare change equity analysis set forth in the final Report provided to the Board for adoption of Ordinance No. 338 finds no *disparate impact* on minority Honored Citizens. Moreover, the analysis finds no *disproportionate burden* on low-income riders due to the structure of the fare increase.¹ However, the analysis does find a potential *disproportionate burden* on low-income riders due to increasing Honored

¹ This specific finding was clarified in the final Report dated May 20, 2015.

Citizen fares in general, as Honored Citizens are more likely to be low-income than other riders.

To mitigate this disproportionate burden TriMet could engage in any of the following possible strategies:

- Increase Access Transit Program funds. These funds would be earmarked specifically for organizations who serve low-income older adults and people with disabilities.
- Increase the Fare Assistance discount for Honored Citizen fares.
- Conduct targeted outreach to community organizations to boost awareness of the Access Transit Programs, especially those that focus on serving senior citizens and/or people with disabilities. This could increase the network of participating organizations that are able to provide assistance to individuals.
- Continue to improve transit service for seniors and/or people with disabilities, many of whom live in the outlying areas of the district due to the availability of affordable housing.
- Once electronic eFare is in place allow Honored Citizen riders a monthly pass discount that allows them to buy a monthly pass one day at a time.

C. Honored Citizen Fare Change Public Comment and Outreach

Public comment on the Honored Citizen fare changes are accepted by phone, email and standard mail. A summary of comments received via these venues was provided to the Board prior to the April 22, 2015 Board meeting, and an update was provided prior to the May 27, 2015 meeting. Verbal and written comments may be provided during Public Forum at the May 27, 2015 Board meeting.

TriMet staff has also conducted extensive outreach at community meetings to obtain feedback on the Honored Citizen fare proposal. The comments from these public meetings were also summarized in the report of public comments provided to the Board prior to their April 22, 2015 meeting, and updated prior to the May 27, 2015 meeting.

6. Financial/Budget Impact

Ordinance No. 338 proposes Honored Citizen fare increases as described below. The increases are estimated to increase fare revenue by approximately \$650,000 annually.

- Honored Citizen Single Ticket/Cash Fares: Increased \$.25, from \$1.00 to \$1.25;
- Honored Citizen 1-Day Passes: Increased \$.50, from \$2.00 to \$2.50;
- Honored Citizen Tickets / Book of 10: Increased \$2.50, from \$10.00 to \$12.50;
- Honored Citizen 7-Day Passes: Increased \$.50, from \$7.00 to \$7.50;
- Honored Citizen 14-Day Passes: Increased \$1, from \$13.50 to \$14.50;
- Honored Citizen Monthly / 30-Day Passes: Increased \$2, from \$26.00 to \$28.00; and
- Honored Citizen Annual Passes: Increased \$22, from \$286.00 to \$308.00.

7. Impact if Not Approved

Should the Board not proceed with a second reading and adopt Ordinance No. 338, the existing Honored Citizen fare pricing structure of the TriMet Code would remain in place.

ORDINANCE NO. 338

AN ORDINANCE OF THE TRI-COUNTY METROPOLITAN
TRANSPORTATION DISTRICT OF OREGON (TRIMET) ADOPTING
HONORED CITIZEN FARE INCREASES, AND AMENDING TRIMET CODE
CHAPTER 19

THE BOARD OF DIRECTORS OF THE TRI-COUNTY METROPOLITAN
TRANSPORTATION DISTRICT OF OREGON (TRIMET), pursuant to the authority of Oregon
Revised Statutes Chapter 267, having considered the transit equity fare change analysis Report,
does hereby ordain and decree the following Ordinance:

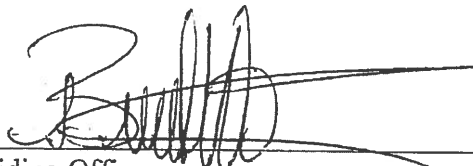
**Section 1 – Adoption of Honored Citizen Fare Increases; Amendment of TriMet Code
Chapter 19**

TriMet Code (TMC) Chapter 19 shall be amended as set forth on the attached Exhibit A, which
is incorporated into and made part of this Ordinance No. 338.

Section 2 – Effective/Operative Dates

This Ordinance shall take effect thirty days after the date of its adoption. Amendments to TMC
Section 19.15 Fares shall become operative on September 1, 2015.

Date Adopted: May 27, 2015

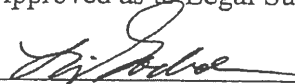


Presiding Officer

Attest:

Kelly Riannon
Recording Secretary

Approved as to Legal Sufficiency:



Legal Department

ORDINANCE NO. 338
EXHIBIT A

TriMet Code (TMC) Chapter 19, Section 19.15 Fares, is amended as set forth below. Deletions are shown in brackets with a line through the text, and additions are shown in underlined, bold text. All amendments shall become operative September 1, 2015.

19.15 Fares.

A. Regular Transit Services:

The fares payable for use on the TriMet transit system shall vary according to the status of the rider and method of payment and shall be as follows:

(1) Monthly Passes and 30-Day Passes

(a) <u>Status</u>	<u>Fare</u>
YOUTH	\$28.00
HONORED CITIZEN	[\$26.00] <u>28.00</u>
ADULT	\$100.00

- (b) A 30-Day Pass shall be valid for travel on any regularly scheduled TriMet route in accordance with the status of the rider for the period of thirty (30) consecutive days from the date of purchase.

(2) Pre-Paid Tickets

(a) <u>Status</u>	<u>Fare</u>
YOUTH	10/\$12.50
HONORED CITIZEN	10/ [\$10.00] <u>12.50</u>
ADULT	10/\$25.00

- (b) Pre-paid unvalidated tickets may be used in the amount of their cash value for payment of additional fare, i.e., two Adult tickets may be used for an Adult 1-Day Pass. Refunds for overpayment will not be given.

* * *

(3) Cash Fares

<u>Status</u>	<u>Fare</u>
YOUTH	\$1.25
HONORED CITIZEN	[\$1.00] <u>1.25</u>
ADULT	\$2.50

(4) Annual Passes

<u>(a) Status</u>	<u>Fare</u>
YOUTH	\$308.00
HONORED CITIZEN	[\$286.00] <u>308.00</u>
ADULT	\$1,100.00

* * *

(6) 1-Day Pass

A 1-Day Pass shall be valid for travel on any regularly scheduled TriMet route, in accordance with the status of the rider, for the remainder of the service day in which the 1-Day Pass is valid.

<u>Status</u>	<u>Fare</u>
YOUTH	\$2.50
HONORED CITIZEN	[\$2.00] <u>2.50</u>
ADULT	\$5.00

(7) 7-Day Pass

The 7-Day Pass shall be valid for travel on any regularly scheduled TriMet route in accordance with the status of the rider for the period of seven (7) consecutive days.

<u>Status</u>	<u>Fare</u>
YOUTH	\$7.50
HONORED CITIZEN	[\$7.00] <u>7.50</u>
ADULT	\$26.00

(8) 14-Day Pass

A 14-Day Pass shall be valid for travel on any regularly scheduled TriMet route in accordance with the status of the rider for the period of fourteen (14) consecutive days as follows:

<u>Status</u>	<u>Fare</u>
YOUTH	\$14.50
HONORED CITIZEN	[\$13.50] <u>14.50</u>
ADULT	\$51.00

Resolution 15-04-17 Endorsing Further Development of Powell-Division Transit and Development Project Including Letter to FTA Seeking Entry into FTA Project Development Under Small Starts

Director of Project Planning Alan Lehto provided a PowerPoint highlighting the Powell-Division Transit and Development project and sharing: 1) collaborative efforts; 2) the multicultural business outreach; 3) the Steering Committee alignment options, and 4) where we are now.

Action: Craig Prosser moved approval of Resolution 15-04-17; Travis Stovall seconded the motion. The motion was unanimously approved.

5. Ordinances

Ordinance 338 Adopting Honored Citizen Fare Increases, and Amending TriMet Code Chapter 19 (First Reading)

General Counsel Shelley Devine read Ordinance 338 by title only – no action is necessary.

President Warner explained that the proposal to raise honored citizen fares has been shared with the public and that over the past month TriMet has been actively seeking input summarized in the latest outreach report provided to the Board and public. At the March Board meeting, staff presented the conclusions of the Equity Analysis for HC fare increase. That analysis was also submitted to the FTA and we have not received any comments back from the FTA.

President Warner stated that if the Board is comfortable with the conclusions of the Analysis, we will proceed to the public hearing on Ordinance 338.

The following people addressed the Board regarding Ordinance 338:

Margaret Clark, member of the Traffic Safety Committee and involved with Ride Connection, spoke about the importance of: 1) maintaining service; 2) the Legislature passing the Transit Bill; and 3) assisting those that cannot afford the increased fare.

Kayla Murphy, Human Solutions, spoke in opposition of Ordinance 338 and shared concerns about the impact and the barrier the fare increase would have on quality of life. Written testimony was also submitted that will be made part of the public record.

Justine Hernandez spoke in opposition of Ordinance 338 and expressed concern that the increase would affect people negatively by impacting their quality of life.

Christopher West, longtime transit-dependent rider, spoke in support of Ordinance 338 and suggested increasing HC pass to \$30.00 a month and also increasing service in Cedar Mills.

Amy Anderson, Mental Health Activist, spoke in opposition to Ordinance 338 and stated that the increase would put a significant burden on the agencies that serve and provide transportation to the medically fragile and seniors in the community. Ms. Anderson asked the Board to look at all aspects when considering fare increases and electronic fares.

JoAnn Herrigel, Civic Involvement Coordinator for Elders in Action, spoke about the importance of: 1) maximizing allocations to minimize the impact of the HC fare increase; 2) public outreach to those impacted on how to access transit discounts and get other assistance where necessary; and 3) the eFare being age-friendly and accessible to people with disabilities, and stated that Elders in Action stands ready to help.

Jared Franz, Policy Director for OPAL, spoke in opposition to Ordinance 338 and presented a letter (made part of the public record) signed by 11 agencies and 21 individuals and asked that the Board table the Honored Citizen increase and explained why there is no financial need for the increase at this time.

Kem Marx spoke in opposition to Ordinance 338 and shared concerns and provided examples of the hardships that the increase would cause.

Teresa Keishi Soto spoke in opposition of Ordinance 338 and shared concerns and examples of hardships that increasing the HC fare would cause and stated that she feels there is no financial need to increase fares that would burden a fixed-income transit-dependent population. Ms. Soto thanked the Board for keeping the HC fare at \$1.00 for the past five years and asked that the Board show compassion and respect by keeping the fare the same.

Lew Church, PSU Progressive Student Union and Transit Riders Union, spoke in opposition to Ordinance 338 and shared concerns about the impact that raising the HC fares would cause and requested that the eligibility age for seniors begin at 60.

Discussion: Director Esmonde asked if there were warranties in place for the PMLR equipment, and if so, is the manufacturer liable for downtime?

Dan Blocher responded that there are varied warranties on all our equipment and that we have limited downtime because our maintenance staff are trained to respond directly and we do not need to wait for the manufacturer. Dan Blocher stated that he would provide the Board with detailed information on warranties.

Action: Joe Esmonde moved approval of Resolution 15-05-23; Travis Stovall seconded the motion. Directors Esmonde, Stovall, Prosser, Bethel and Warner voted yes, Directors Bauman and Martin abstained – motion passed.

Resolution 15-05-24 Authorizing Modifications of the Streetcar Operating Agreement with the City of Portland

Action: After general discussion, Craig Prosser moved approval of Resolution 15-05-24; T. Allen Bethel seconded the motion. Directors Esmonde, Stovall, Prosser, Bethel and Warner voted yes, Directors Bauman and Martin abstained – motion passed.

Resolution 15-05-25 Authorizing Ride Connection to Provide Job Access Reverse Commute Services

Action: T. Allen Bethel moved approval of Resolution 15-05-25; Travis Stovall seconded the motion. Directors Esmonde, Stovall, Prosser, Bethel and Warner voted yes, Directors Bauman and Martin abstained – motion passed.

5. Ordinances

Ordinance 338 Adopting Honored Citizen Fare Increases, and Amending TriMet Code Chapter 19 (Second Reading)

General Counsel Shelley Devine read Ordinance 338 by title only.

Neil McFarlane stated that TriMet has been actively seeking public input regarding the proposed increase to our Honored Citizen Fare and that the latest outreach report has been provided to the Board. Mr. McFarlane explained that the proposal includes a 25 cent increase for a single ride ticket and a \$2 increase for a monthly pass; bringing fares from \$1 to \$1.25 and from \$26 to \$28, respectively. We are working with honored citizen stakeholders and Ride Connection to implement mitigation efforts that include:

- Increase in discount on HC fares from 5% to 20% for organizations who service Honored Citizens.
- Expand Small Grants program for new nonprofit organizations who service HC populations (earmarked for low-income Honored Citizens and persons with disabilities).

President Warner stated that the Board has seen the extensive community outreach that has been done, heard from community members, considered the Transit Equity Analysis, and is aware of the policy direction this Board has wanted to move forward, and asked for discussion on Ordinance 338.

Director Prosser stated there is never a good time to raise fares because there will always be legitimate concerns about raising fares for the most vulnerable part of our community. While it may look like we have a healthy bottom line, this is a critical time to build a fare structure that is equitable and sustainable over the long-term to provide and expand the service that is so needed and asked for throughout the region. Director Prosser stated that he is confident in the existing and the expanded mitigation that would assist the people who are most impacted and would allow us to move forward with providing and expanding the much needed service.

Director Stovall asked for clarification on Table 3 of the Transit Equity Analysis, community engagement, and the mitigation program.

Director Esmonde asked how many organizations are participating in the mitigation program – Johnell Bell responded over 85 and explained the outreach process.

President Warner stated that he agrees with Director Prosser that we need to look at the long-term and be very deliberate in our fare policies and maximize service while minimizing adverse impact. President Warner stated the importance of a broader community conversation in a holistic manner to balance increasing service with an equitable fare policy.

Director Stovall stated his concern that the Transit Equity Advisory Committee did not officially weigh in on this Ordinance and stated the importance of advisory committees to the Board vetting these important issues.

Action: Joe Esmonde moved approval of Ordinance 338; Travis Stovall seconded the motion.

The following roll call vote resulted in the approval of Ordinance 338:

Joe Esmonde.....	Yes
Shelley Martin.....	Abstained
T. Allen Bethel.....	Yes
Bruce Warner.....	Yes
Lori Irish Bauman.....	Abstained
Travis Stovall.....	Yes
Craig Prosser.....	Yes

Ordinance 339 Adopting Service Changes, Updating Route Designations and Amending TriMet Code Chapter 22, and Repealing TriMet Code Chapter 20, Charter Rates (Second Reading)

Attachment M

TITLE VI FARE EQUITY ANALYSIS FOR MIGRATION TO E-FARE, WITH DOCUMENTATION OF BOARD APPROVAL

Title VI Fare Equity Analysis for Migration to E-Fare



January 6, 2016

Prepared for TriMet

Prepared by:

KFH Group, Inc.

4920 Elm Street, Suite 350, Bethesda MD 20814

(301) 951-8660



*Photo credits: www.portlandrescuemission.org,
www.metro-magazine.com, www.trimet.org*

Executive Summary

This report documents TriMet's fare equity analysis of its proposed migration to an integrated electronic fare payment (e-fare) system including related public engagement efforts. The purpose of the fare equity analysis is to determine, prior to implementing changes to the fare system, whether the planned changes will have a disparate impact on the basis of race, color, or national origin, or if low-income populations will bear a disproportionate burden of the changes.

The fare equity analysis involved a technical analysis using rider survey data and public input collected through a community engagement process. Public input collected from TriMet's Transit Equity Advisory Committee (TEAC) and community based organizations (CBOs) that work with minority and low-income populations informed TriMet's decision-making process in further refining the e-fare system concept.

Early in the e-fare planning process (January 2015), TriMet used rider survey data to conduct a preliminary fare equity analysis of draft e-fare policies addressing areas such as access, payment methods, price, fare products, and transfers. TriMet addressed some of the initial findings of disparate impacts and disproportionate burdens through early mitigation measures that included maintaining paper transfers for cash/ticket payment and maintaining the sale of paper 1-Day Passes on the bus. TriMet also elected to establish the card fee at \$3 instead of \$3.50, and to maintain the same price for 2 ½ Hour Tickets for both cash payment and eFare. While TriMet's long-term goal is to phase out many of the paper tickets and passes in the current fare system, these options will remain available to customers with the initial implementation of the e-fare system.

From September-December 2015, TriMet worked with CBOs to plan and conduct public engagement meetings regarding the proposed e-fare policies and potential mitigations. Participants at the CBO meetings generally welcomed the idea of the e-fare system and particularly liked the benefits of the fare caps, lost value protection, ability of stored value to roll over, and the broader range of options to pay fares.

Common concerns identified through public engagement were the costs of multiple e-cards for families, gaps in access to the retail network, and the security of personal information used in e-card registration. None of the concerns rose to the level of opposition to the program but generally reflected a desire to further improve and expand the benefits of eFare. Suggestions offered at the CBO meetings to improve the program included a new option for a family card, the ability to use the e-card or the e-fare mobile app to pay from the same account, the ability to use a mobile phone number for e-card registration in lieu of an email address, extensive education on e-fare to diverse communities, and a key ring size e-card.

TriMet's equity analysis found that the following e-fare policies will have *no* disparate impact or disproportionate burden, and were not identified as high concerns through the public input process:

-
- Elimination of mail-order purchasing of fare media
 - Increase to 500+ retail outlets
 - New fare caps available with e-fare
 - Elimination of 7-Day Pass
 - Elimination of 14-Day Pass

Based on the technical analysis, the following policy options may result in potential disparate impacts on minority populations or disproportionate burdens on low-income populations:

- Automatic reload option for e-card using a credit/debit card (potential disparate benefit)
- New fare medium to pay fares using a contactless smart credit/debit card (potential disparate benefit)
- \$5 minimum load requirement for e-card

And through the public engagement process two issues in particular were frequently raised that were not identified in the technical analysis:

- \$3 e-card cost (impact on families in particular)
- Barriers to e-card registration, including concern about providing personal information and the requirement to provide an email address when registering the e-card

TriMet staff recommends implementing several mitigation measures to address these findings:

- Distribute at least 100,000 free e-cards during the initial period, with particular effort to reach minority, low-income, and limited English proficiency populations.
- Longer term provision of free e-cards through TriMet's Access Transit fare programs.
- Add more locations to the retail network, specifically in minority and low-income neighborhoods.
- Establish a lower minimum load requirement at certain locations, such as TriMet's Pioneer Square Ticket Office.
- Establish the option to register the e-card by phone, providing only a username and PIN (instead of email address). Interpretation services in multiple languages will also be available to customers who register by phone.
- Explore opportunities to address the needs of large families.
- Provide training and technical assistance to CBOs on how to purchase and distribute fares for their clients in the e-fare system.

Fare Equity Analysis for Migration to E-Fare

Introduction

This report documents TriMet’s fare equity analysis of its proposed migration to an integrated electronic fare payment (e-fare) system including related public engagement efforts. The fare equity analysis was performed in accordance with the requirements of the Federal Transit Administration’s Circular 4702.1B, *Title VI Requirements and Guidelines for Federal Transit Administration Recipients* and TriMet’s 2013 Title VI Program. The purpose of the fare equity analysis is to determine, prior to implementing changes to the fare system, whether the planned changes will have a disparate impact on the basis of race, color, or national origin, or if low-income populations will bear a disproportionate burden of the changes.

The report is structured by draft e-fare policy. For each policy, first the results of the technical analysis using rider survey data are described, including any findings of a potential disparate impact on minority¹ populations or a potential disproportionate burden on low-income² populations. Then the public input received on the policy is highlighted in a text box. From September-December 2015, TriMet worked with community based organizations (CBOs) to plan and conduct public engagement meetings regarding the proposed e-fare policies and potential mitigations. The input collected through this process provided important insights from minority and low-income individuals about if and how they would use the e-fare system and how policies might affect them.

TriMet staff will provide a copy of this analysis and present the recommended e-fare policies to the TriMet Board of Directors in January 2016. Both the technical analysis and the public engagement results will inform the Board’s decision-making process on the basic features of the e-fare system.

Background

TriMet’s goals in transitioning to the e-fare system include offering customers a fast, convenient, and secure approach to paying their fares and to increase operational efficiencies. Early in the e-fare planning process (January 2015), TriMet used rider survey data to conduct a preliminary fare equity analysis of draft e-fare policies addressing areas such as access, payment methods, price, fare products, and transfers. Table 1 outlines the draft e-fare policies analyzed in the preliminary fare equity analysis. The initial findings provided content for early community engagement

¹ “Minority” is defined as all races/ethnicities besides white, non-Hispanic.

² “Low-income” is defined as at or below 150% of the federal poverty level set by the Department of Health and Human Services.

efforts regarding e-fare in 2015 and helped frame issues for discussion in this formal Title VI analysis.

Table 1: Draft E-Fare Policies Analyzed in Preliminary Analysis (January 2015)

Policy Area	Proposed Change
Access	Increase to 500+ retail outlets Eliminate mailing fare media (passes) Paper 1-Day Pass no longer available for purchase on bus
Payment	Automatic reload option for e-card
Fare Medium	New fare medium - contactless smart credit/debit card
Price	Costs for e-card (\$3 fee, \$5 min. load) New fare caps on e-cards only
Fare Product Options	Eliminate 7-Day Pass Eliminate 14-Day Pass
Transfers	Eliminate Transfers with Cash/Ticket Payment

Title VI Public Engagement

The public engagement activities related to the fare equity analysis were conducted ahead of TriMet’s broader public education and outreach on e-fare, planned for 2016. Therefore, the preliminary Title VI outreach provided an opportunity to both educate select residents in the TriMet service district on the proposed e-fare changes and to collect input directly from minority and low-income persons on how e-fare may affect them. A detailed description of the public engagement process is provided on pages 6-7. Public input collected from TriMet’s Transit Equity Advisory Committee (TEAC) and CBOs that work with minority and low-income populations informed TriMet’s decision-making process in further refining the e-fare system concept.

Preliminary Findings

In December 2015, TriMet updated the preliminary fare equity analysis that was conducted in January 2015 to reflect the most recent e-fare policies. The preliminary equity analysis had identified the following six draft e-fare policies as those that could result in possible disparate impacts and/or disproportionate burdens:

- Elimination of transfers with cash/ticket payment
- Paper 1-Day Pass no longer available for purchase on bus
- \$3 card fee for initial card and replacement card, in the scenario where the cash transfer is eliminated

-
- \$5 minimum load requirement for e-card
 - Automatic reload option for e-card using a credit/debit card (potential disparate benefit)³
 - New fare medium to pay fares using a contactless smart credit/debit card (potential disparate benefit)

Early Mitigations

Per the guidelines in the FTA Title VI circular, findings of disparate impact or disproportionate burden call for steps to avoid, minimize, or mitigate impacts where practicable. Thus, in response to the preliminary analysis findings as well as TEAC and public input regarding hardships for transit-dependent riders, TriMet addressed the first three findings by:

- Maintaining paper transfers for cash/ticket payment, and
- Maintaining the sale of paper 1-Day Passes on the bus.

While TriMet's long-term goal is to phase out many of the paper tickets and passes in the current fare system, these options will remain available to customers with the initial implementation of the e-fare system.

Remaining Findings

Three remaining e-fare policies may have potential disparate impacts on minority individuals and potential disproportionate burdens on low-income individuals:

- Automatic reload option for e-card using a credit/debit card (potential disparate benefit)
- New fare medium to pay fares using a contactless smart credit/debit card (potential disparate benefit)
- \$5 minimum load requirement for e-card

The first two policies were identified as having potential disparate benefits because minority and low-income individuals would be less likely to take advantage of these benefits to the same degree as non-minority and non-low-income individuals, who are more likely to have credit/debit cards. The minimum load requirement may be a hardship on individuals who cannot afford to load \$5 at a time onto the e-card – for example, Honored Citizens and youth (whose day passes cost \$2.50) or riders who complete their day's travel on TriMet using a \$2.50 single fare.

TriMet worked with CBOs in November and December 2015 to collect input on these and other proposed e-fare features from minority, low-income, and limited English proficient individuals.

³ This policy option was originally analyzed as a new payment method by bank account to facilitate loading value manually or automatically reloading value onto the e-card. Following the preliminary analysis, it was clarified that this option will require a credit/debit card, which riders can currently use to purchase fares. The policy was reworded to focus on the new automatic reload option.

In addition to the three findings from the technical analysis, two other concerns were frequently cited during the public engagement process:

- \$3 e-card cost (impact on families in particular)
- Barriers to e-card registration, including concern about providing personal information and the requirement to provide an email address when registering the e-card

The next sections of the report describe TriMet’s approach to the technical analysis and process to collect early input on how proposed e-fare policies and features may affect minority and low-income populations in the service district. In the following section the technical analysis results and public feedback are presented per draft e-fare policy, followed by a discussion of planned and possible mitigation measures.

Fare Equity Technical Analysis

It is important for fare equity analyses to examine both scenarios where minority and low-income riders may bear a greater share of negative impacts, or experience a lesser share of positive impacts than non-minority and non-low-income riders. TriMet evaluated draft e-fare policies for both.

Methodology

The first portion of the technical equity analysis used data from the 2012 TriMet on-board survey on fares. The survey was conducted from October to December 2012 and included 16,982 respondents. The data represented one-way trips, not individual riders, and was weighted to adjust for transfers and ridership by route type. Given different ridership patterns, weekday trips were evaluated separately from weekend trips in the analysis.

While most of the policy options could be analyzed using this rider survey data, a few options could only be analyzed using demographic data and GIS maps to evaluate the policy impacts on minority and low-income populations compared to non-minority and non-low-income populations. See Appendix A for the step by step methodologies used to conduct the technical analysis.

TriMet’s Disparate Impact and Disproportionate Burden Policies

TriMet applied the following policies in determining if the draft e-fare policies may result in disparate impacts on minority populations or disproportionate burdens on low-income populations.

Disparate Impact Policy – Minority Populations

Transit providers are required to develop a policy for measuring disparate impacts. The policy establishes a threshold for determining when the adverse effects of fare changes are borne

disproportionately by minority populations. The disparate impact threshold must be applied uniformly, regardless of mode, and cannot be altered until the next Title VI Program submission. The following is TriMet's disparate impact policy regarding fare changes, established in its 2013 Title VI Program:

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 – Low-income Populations

While low-income populations are not a protected class under Title VI, the Federal Transit Administration requires transit providers to evaluate proposed fare changes to determine the relative impact on low-income populations. Transit providers are required to develop a policy for measuring disproportionate burdens on low-income populations, which establishes a threshold for determining when the adverse effects of service changes or fare changes are borne disproportionately by low-income populations. The following is TriMet's disproportionate burden policy regarding fare changes, established in its 2013 Title VI Program:

As defined by TriMet, a person whose household income is at or below 150 percent of the poverty level set by the U.S. Department of Health and Human Services (HHS) is considered low-income.

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.

TriMet's disparate impact and disproportionate burden policies define differences in the use of fare options between minority/low-income and non-minority/non-low-income populations as those that are statistically significant at the 95 percent confidence level. Therefore, where the results showed differences that were not statistically significant, TriMet found no disparate impact or disproportionate burden.

A summary of the technical analysis results and the survey data used to evaluate each policy option are included in Appendix B. The results are described in further detail by e-fare policy below.

Public Input Activities on Draft E-Fare Policies and Mitigations

TriMet’s public engagement efforts played an important role in the equity analysis process. Direct input from the TEAC and minority and low-income community members on the anticipated impacts of the e-fare policies complemented the technical analysis by qualitatively testing some of the findings and providing additional insights beyond the survey data analysis.

TriMet conducted both internal and external outreach regarding its Title VI fare equity analysis. The internal outreach involved updating TEAC on the progress of the equity analysis and collecting input on external outreach strategies and the interim reports. The equity analysis results also underwent review by TriMet’s General Manager and executive leadership. Media and Customer Service staff helped review materials and arranged for translation and interpretation services for the external outreach.

The external outreach involved partnering with community based organizations (CBOs) to collect meaningful input on the potential impacts of e-fare on their constituents. The CBOs work with communities of color, low-income populations, individuals with limited English proficiency, youth, immigrants, and refugees. About 140 constituents and staff provided input across seven meetings hosted by the CBOs in locations throughout TriMet’s service area.

TriMet’s consultant for the fare equity analysis, KFH Group, contracted with each CBO to arrange for logistics, host the meetings, invite their constituents, and provide a report on the meeting(s) the CBOs hosted. The moderator guide used by CBO staff and TriMet staff is attached as Appendix C. TriMet translated this guide into Spanish and provided interpretation during the meetings in Spanish, Arabic, and Nepali. Somali participants at one of the meetings brought their own interpreter. The CBO reports of discussion points and takeaways can be found in Appendix D, and the input received across all meetings is summarized per e-fare policy below.

The following CBOs hosted public engagement meetings:

- Asian Pacific American Network of Oregon (APANO) hosted a meeting in southeast Portland.
- Black Parent Initiative (BPI) hosted a meeting in northeast Portland.
- Center for Intercultural Organizing (CIO) hosted two meetings in Beaverton (Washington County).
- Gladstone High School hosted a meeting in Gladstone (Clackamas County).
- Latino Network hosted a meeting in central Portland.
- Native American Youth and Family Center (NAYA) hosted a meeting in northeast Portland.

Table 2 details the meetings that were conducted and the number of constituents that participated in each. Each meeting consisted of an introduction by the CBO, an overview of the proposed e-fare system (“Hop 101”) presented by TriMet staff, and a series of discussion questions facilitated by the CBO and supported by TriMet.

Results by Draft E-Fare Policy

TriMet initially identified nine proposed e-fare policies that could impact minority and low-income populations differently than non-minority and non-low-income populations. The equity analysis found that five of the e-fare policies will have **no** disparate impact or disproportionate burden, and were not identified as high concerns through the public input process. The evaluation results for these policies are presented first, followed by the e-fare policies where the technical analysis or the public engagement process found potential Title VI impacts.

For the draft policy options that TriMet evaluated as benefits, beyond noting potential disparate impacts or disproportionate burdens, the results also highlight instances where minority or low-income riders may experience a greater share of the benefits than their non-minority and non-low-income counterparts.

E-Fare Policy Options with No Disparate Impact/Disproportionate Burden Findings

The technical analysis found that the following policy options were not likely to result in disparate impacts and disproportionate burdens:

- Elimination of mail-order purchasing of fare media
- Increase to 500+ retail outlets
- New fare caps available with e-fare
- Elimination of 7-Day Pass
- Elimination of 14-Day Pass
- \$3 card fee for initial and replacement e-card*

*While the technical analysis did not find disparate impacts or disproportionate burdens when evaluating survey data related to the \$3 one-time card fee for initial and replacement e-cards, so long as cash transfers are maintained, this fee was a common concern cited during the public engagement process and is therefore included with the policies that have potential Title VI impacts.

Eliminate Mail-Order Purchasing of Fare Media (Passes and Cards)

Explanation

TriMet riders can currently order 2 1/2-Hour Tickets, 1-Day Passes, and 1-Month Passes online and have them delivered by mail. The proposed policy would eliminate this option for riders in

Table 2. E-Fare Title VI Public Engagement Meetings

Meeting Date and Time	CBO Host and Location	Geographic Area Focus	Number of CBO Attendees	Minority Demographic Groups Identified Among Participants	Language Translation at Meeting
Friday Nov. 13, 2015 10:00 am	BPI 2915 NE Martin Luther King Blvd Portland, OR 97212	Multnomah County	4 constituents 4 staff	African-American, female teen parents receiving public assistance & middle class individuals	None
Thursday Nov. 12, 2015 6:00 pm	APANO 2788 SE 82nd Ave, Suite 203 Portland, OR 97266	Multnomah County	5 constituents 1 staff	Asian and Pacific Islanders	None
Thursday Nov. 12, 2015 3:00 pm	Gladstone High School 18800 Portland Ave Gladstone, OR 97027	Clackamas County	4 constituents 1 staff	Latino	None
Monday Nov. 23, 2015 6:00 pm	Latino Network 410 NE 18th Ave Portland, OR 97232	Multnomah County	15 constituents 2 staff	Latino	Spanish presentation, with English translation of discussion
Monday Nov. 30, 2015 4:00 pm	NAYA 5135 NE Columbia Blvd Portland, OR 97218	Multnomah County	13 constituents 1 staff	Native American, majority female, about half low- income	None
Thursday Dec. 3, 2015 6:00 pm	CIO 12625 SW Broadway, Suite 200 Beaverton, OR 97005	Washington County	40 constituents 1 staff	Arabic, Latino & African	English presentation, translated to/from Spanish & Arabic
Saturday Dec. 5, 2015 1:30 pm	CIO 12625 SW Broadway, Suite 200 Beaverton, OR 97005	Washington County	48 constituents 1 staff	Arabic, Latino, African, Bhutanese, Asian Pacific Islander	English presentation, translated to/from Nepali, Arabic, Spanish & Somali

order to encourage migration to e-fare, streamline operations, and reduce costs associated with supporting labor-intensive mail order programs.

Analysis

TriMet evaluated this policy option for the potential adverse effects on riders that currently purchase fare media to be delivered by mail. Overall, riders buy passes to deliver by mail for 2.4% of the weekday trips, including 2.1% of the minority trips and 2.4% of the non-minority trips. The difference between minority and non-minority mail-order purchasing is not statistically significant, so ***no disparate impact is found.***

Riders buy passes to deliver by mail for 1.9% of the weekday low-income trips and 3.1% of the non-low-income trips. A lower percentage of low-income trips would experience the adverse effects if TriMet stopped allowing riders to buy passes through the mail, and the difference is statistically significant, so ***no disproportionate burden is found.***

Overall, riders buy passes to deliver by mail for 1.6% of the weekend trips, including 1.6% of the minority trips and 1.5% of the non-minority trips. The difference between minority and non-minority mail-order purchasing is not statistically significant, so ***no disparate impact is found.*** Riders buy passes to deliver by mail for 1.2% of the weekend low-income trips and 1.7% of the non-low-income trips. The difference between low-income and non-low-income mail-order purchasing is not statistically significant, so ***no disproportionate burden is found.***

Public Input on Eliminating Mail-Order Purchasing of Fare Media

- No concerns were raised – participants focused on whether the retail network would meet their needs

Increase to 500+ Retail Outlets

Explanation

The proposed retail network, where riders would be able to purchase and load value onto e-cards (in addition to online, through the mobile app, or by phone), would increase by over 500 stores, located throughout the TriMet service district.

Analysis

TriMet evaluated this policy to compare the benefits that minority, non-minority, low-income, and non-low-income populations will receive. TriMet mapped the locations of the retail outlets, overlaid on the minority and low-income populations within the service district. TriMet then compared the percentages of minority and low-income populations with access to the retail outlets to those of non-minority and non-low-income populations, respectively, to determine if a potential disparate impact or disproportionate burden exists.

As background, TriMet first mapped the minority and low-income populations within the service district. Figure 1 depicts the percentage of minority persons per block group in TriMet's service area.⁴ Out of 942 total block groups, 364 have a minority population above the service area average (27.2%).

Figure 2 depicts the percentage of low-income individuals per block group. TriMet defines low-income as those earning less than 150% of the federal poverty level. Out of 942 total block groups, 388 have a low-income population above the service area average (22.4%). These block groups are spread throughout the service area, though particularly within the City of Portland.

As of December 2015, TriMet is planning to add 500+ new retail outlet locations where riders may purchase fares. The current and proposed locations of outlets were mapped, with half mile "buffers" around them. If the centroid of a block group fell within the half mile buffer, the population of that block group was considered as having access to a retail location. Figures 3 and 4 portray the current and proposed retail network overlaid on the minority and low-income populations, respectively, within the service district.


TEAC Recommendation
TEAC recommends focusing on recruiting employers to participate in e-fare as a way to effectively expand access to the system.

Table 3 shows the minority and low-income populations that have access to the current and proposed retail locations. Currently, 86,604 minorities and 77,960 low-income individuals have access to retail locations. Once the proposed retail network is in place, this will increase to 225,937 minorities, or 56.0% of the minority population in the service district, and 205,803 low-income individuals, or 62.7% of the low-income population in the service district. Greater percentages of both minorities and low-income individuals will have access to the proposed network than non-minorities (48.6%) and non-low-income individuals (47.1%), so **no disparate impact or disproportionate burden is found**. It is worth noting that higher percentages of the minority and low-income populations have access to the current network, and this will remain the case with the proposed network.


In addition, TriMet examined the growth in access for each population once the proposed retail network is in place. Access would increase for all populations, and the change in access for minorities (+34.5%) and low-income individuals (+39.0%) is greater than that of non-minorities (+30.4%) and non-low-income individuals (+29.4%). Therefore, **no disparate impact or disproportionate burden is found**.


⁴ TriMet considers a block group that straddles its service area boundary within the area if at least 50 percent of the block group's dwelling units appear inside the boundary based on inspection of aerial imagery.

Figure 1: TriMet Service Area Minority Population

 TriMet Service District

Minority - Above and Below Service Area Ave.

 Less than 27.1%

 27.2% and above

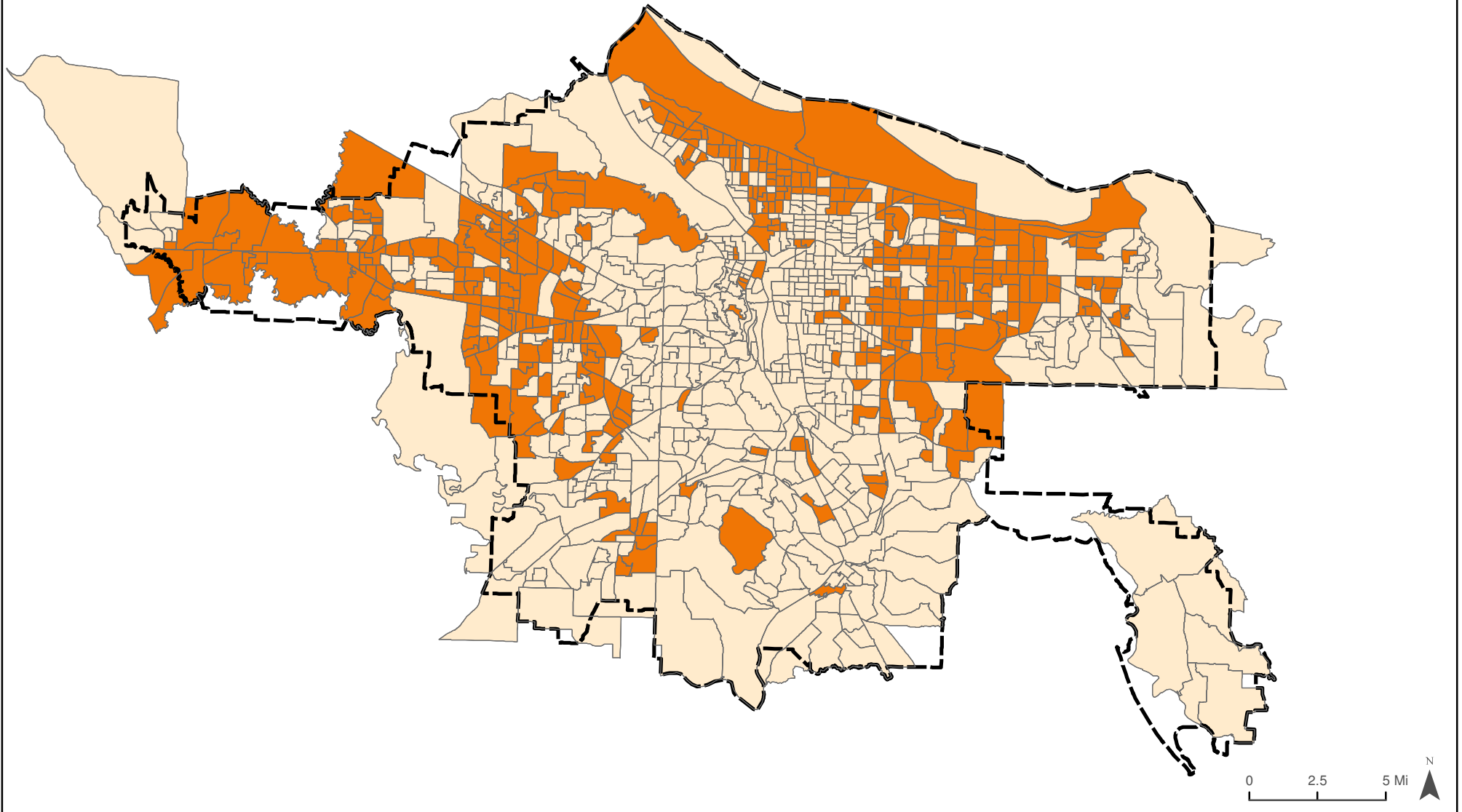




Figure 2: TriMet Service Area Low Income Population

 TriMet Service District

Low Income - Above and Below Service Area Ave.

 Less than 22.4%

 22.5% and above

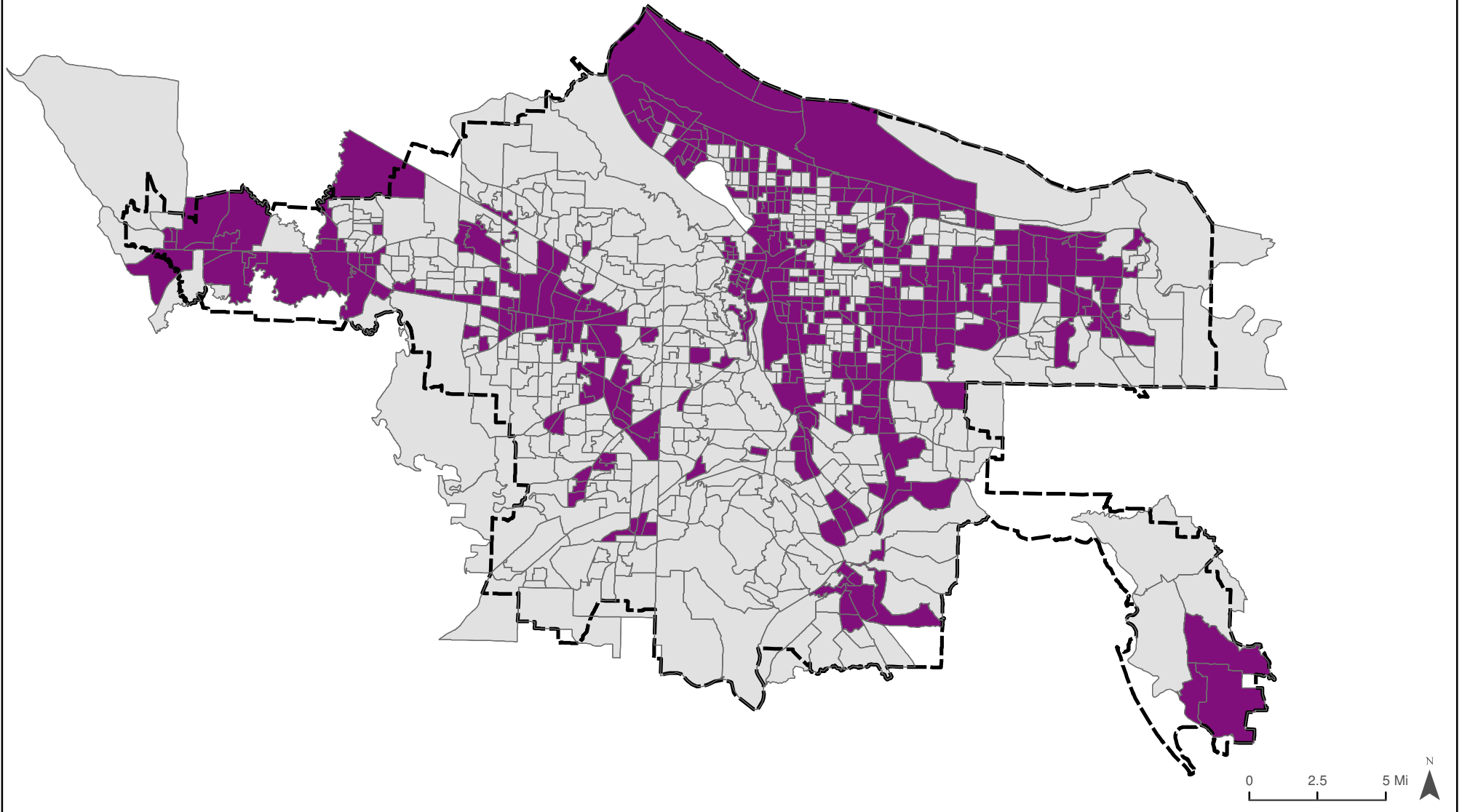


Figure 3: Current and Proposed Retail Outlets, Minority Population Overlay

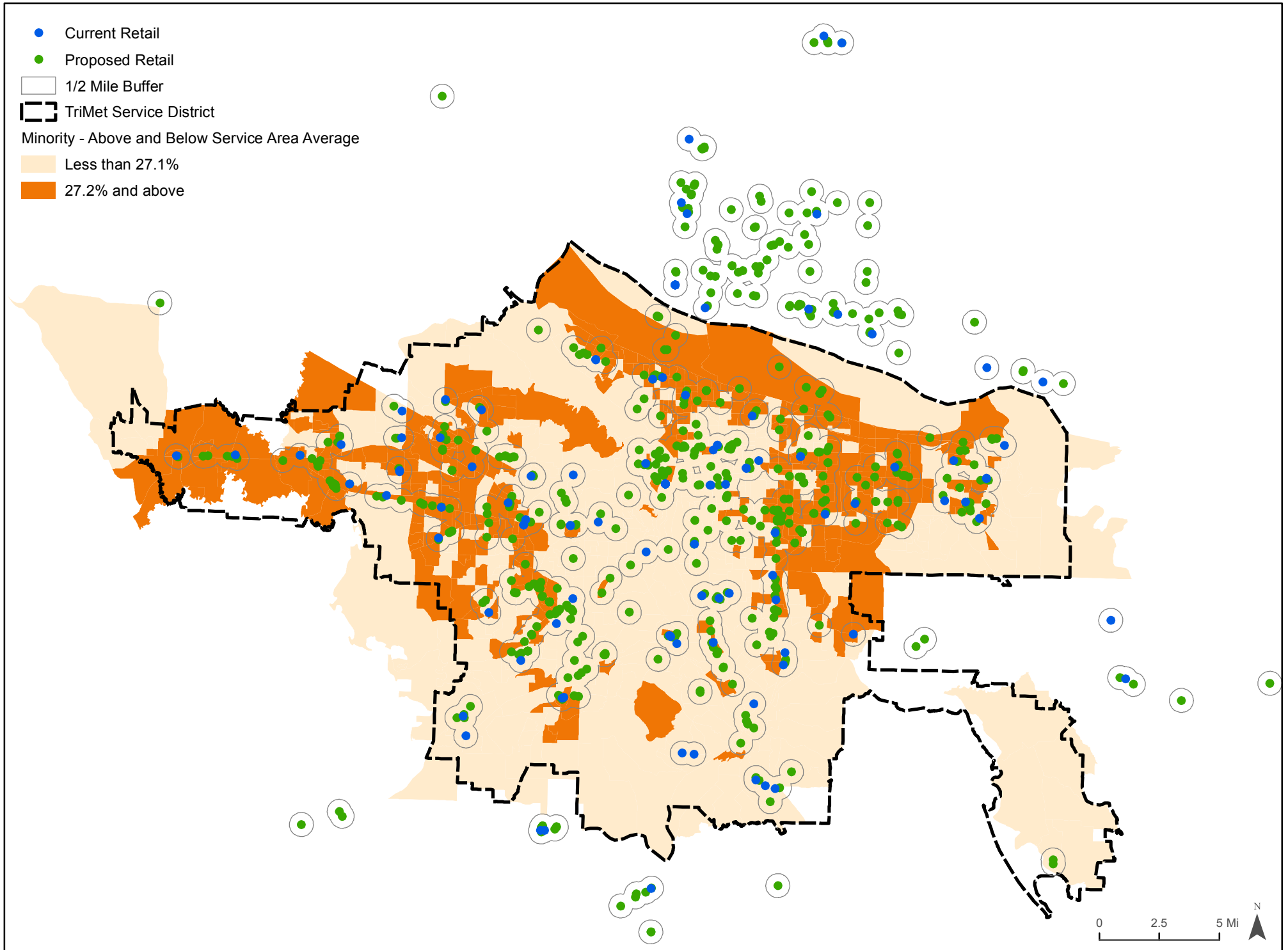


Figure 4: Current and Proposed Retail Outlets, Low-Income Population Overlay

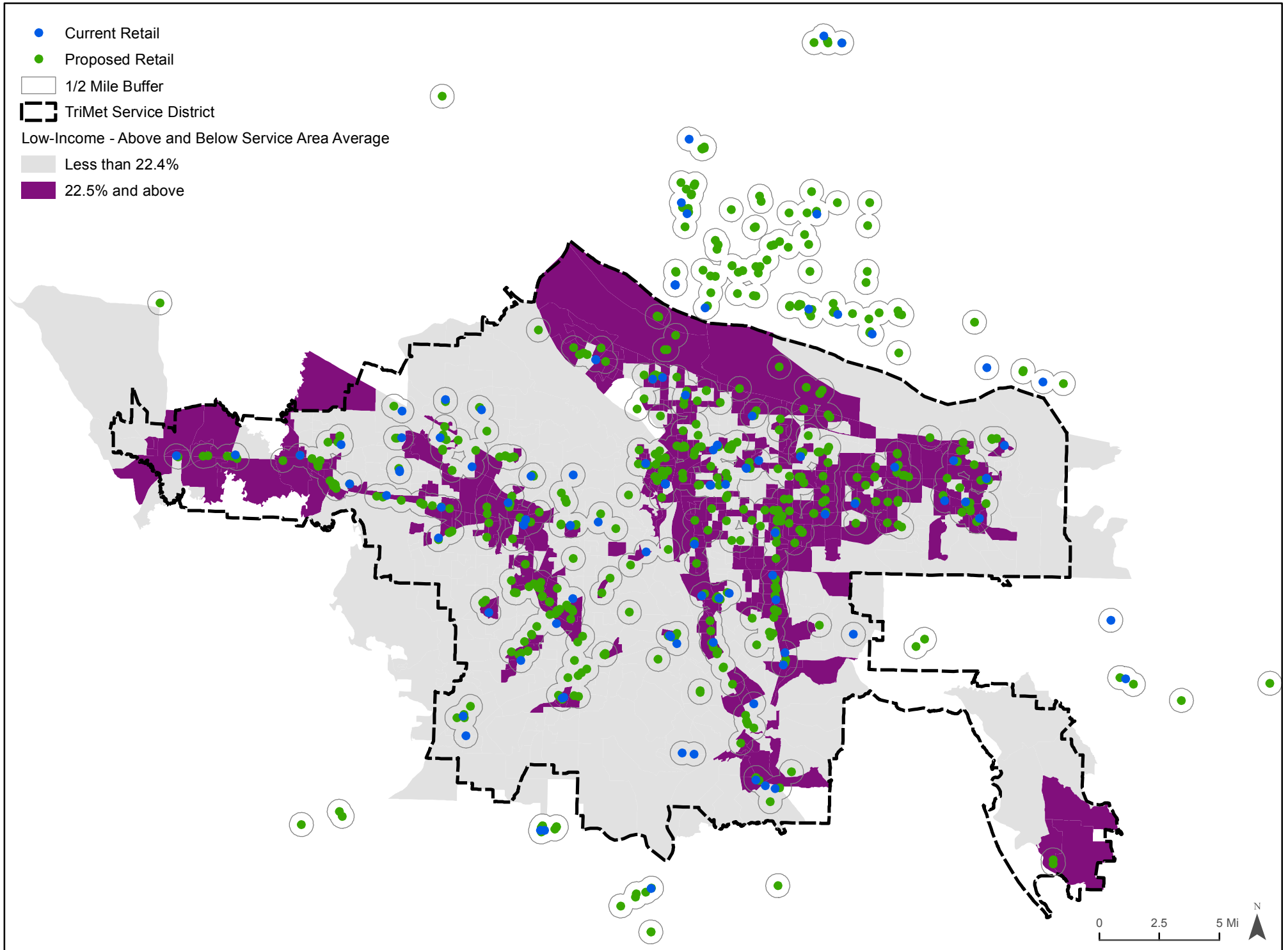


Table 3: Current and Proposed Access to the Retail Network

	Service Area Population	Current Access	Percent Current Access	Proposed Access	Percent Proposed Access	Change
Overall ¹	1,489,764	284,406	19.1%	753,356	50.6%	31.5%
Minority	403,648	86,604	21.5%	225,937	56.0%	34.5%
Non-Minority	1,086,116	197,802	18.2%	527,419	48.6%	30.4%
Low-Income	328,388	77,960	23.7%	205,803	62.7%	39.0%
Non-Low-Income	1,139,864	201,949	17.7%	537,018	47.1%	29.4%

¹Numbers based on the universe for the minority population calculations.

Public Input on Increase to 500+ Retail Outlets

- Going to retail stores was cited as most popular method of adding value to e-card
- Current retail network seemed to meet most participants' needs - convenient to buy fares where they already shop
- Some concern for availability of retail outlets in Washington County including Forest Grove, Cornelius & Tualatin
- Suggested retail locations included libraries, schools (including universities and community colleges), banks, juvenile detention centers, domestic violence shelters, social service agencies, convenient stores, coffee shops, places of worship & ethnically specialized stores
- Some interest in being able to add value at major transit centers & ticket vending machines, especially in areas with limited access to retail vendors

New Fare Caps Available in E-Fare

Explanation

Fare caps will limit the amount a rider spends on TriMet in a given day or month. The new daily and monthly fare caps that will be available on e-cards are equivalent in cost to the existing 1-Day and Monthly Passes. The daily fare cap will also be available to riders paying by Apple/Android Pay on their smartphone or by contactless smart credit/debit card.

Analysis

Fare caps will be available to riders who purchase an e-card, which was evaluated above. Additionally, TriMet examined the riders that may benefit from the fare caps to determine if disparate impacts or disproportionate burdens may occur. Riders that pay their fares by cash may benefit from the fare caps if they ride frequently enough. Assuming these riders switch to an e-card, they will receive the benefits of daily and monthly passes through the fare caps, without having to pay the upfront cost of a pass.

Overall, riders who pay by cash and ride frequently enough to benefit from the new fare caps account for 4.3% of the weekday trips, including 5.0% of the minority trips and 3.8% of the non-minority trips. The difference between minority and non-minority cash usage, where riders travel frequently enough to benefit from the fare caps, is not statistically significant, so ***no disparate impact is found***.

Riders who pay by cash and ride frequently enough to benefit from the new fare caps account for 6.6% of the weekday low-income trips and 2.6% of the non-low-income trips. A higher percentage of low-income trips would experience the benefits of the new fare caps, and the difference is statistically significant, so ***no disproportionate burden is found***. In fact, low-income trips where riders pay by cash are more likely to benefit from the new fare caps.

Overall, riders who pay by cash and ride frequently enough to benefit from the new fare caps account for 7.4% of the weekend trips, including 9.0% of the minority trips and 6.8% of the non-minority trips. A higher percentage of minority trips would experience the benefits of the new fare caps, and the difference is statistically significant, so ***no disparate impact is found***. Weekend minority trips where riders pay by cash are actually more likely to benefit from the new fare caps.

Riders who pay by cash and ride frequently enough to benefit from the new fare caps account for 10.0% of the weekend low-income trips and 4.5% of the non-low-income trips. A higher percentage of low-income trips would experience the benefits of the new fare caps, and the difference is statistically significant, so ***no disproportionate burden is found***. Weekend low-income trips where riders pay by cash are actually more likely to benefit from the new fare caps.

It is worth noting that the fare caps will generally impact a higher percentage of weekend trips than weekday trips, near double. In other words, cash paying weekend riders tend to take more trips on TriMet over the course of a month than those who may ride only on the weekdays.

Public Input on New Fare Caps Available in E-Fare

- Participants liked this benefit because it allows riders to load value in smaller increments toward a pass - especially beneficial to low-income riders who cannot afford the upfront cost
- Many participants had experienced spending more than the cost of a day pass in a single day due to taking unexpected trips. The daily fare cap would eliminate this issue for e-fare users.
- Participants liked the potential to save money if you ride frequently
- Need good education on how fare caps will work

Elimination of 7-Day Pass

Explanation

The 7-Day Pass was created in 2006 as an alternative for riders who could not afford the upfront cost of a monthly pass. This product has not been well-utilized since its inception, and would be eliminated for several reasons: first, because of new daily and monthly fare caps in place under e-fare; second, riders will be able to load value to e-cards in any increment \$5 or greater; and third, in order to simplify the fare structure. This e-fare policy was evaluated for the potential adverse effects on current pass users, as well as the potential benefits that current pass users will receive from the new fare caps.

Analysis of Potential Adverse Effects

TriMet evaluated this policy option for the potential adverse effects on riders that currently use the 7-Day Pass – namely, under the e-fare system these riders will need to pay per trip. If the riders transition to using e-cards, they will benefit from the new fare caps; however, the total cost for a 7-Day period (e.g., \$35 for Adult fares) will be higher than the current cost of a 7-Day Pass (e.g., \$26 for Adult fares). If the riders switch from the 7-Day Pass to cash single fares instead of e-fare, the total cost may be even higher depending on the number of trips they take.

Overall, riders use the 7-Day Pass for 1.3% of the weekday trips, including 1.8% of the minority trips and 1.1% of the non-minority trips. The difference between minority and non-minority usage of the 7-Day Pass is not statistically significant, so ***no disparate impact is found***.

Riders use the 7-Day Pass for 1.3% of both the weekday low-income and the non-low-income trips. Given no difference between low-income and non-low-income usage of the 7-Day Pass, ***no disproportionate burden is found***.

Overall, riders use the 7-Day Pass for 2.0% of the weekend trips, including 2.0% of both the minority and the non-minority trips. Given no difference between minority and non-minority usage of the 7-Day Pass, ***no disparate impact is found***.

Riders use the 7-Day Pass for 2.0% of the weekend low-income trips and 2.7% of the non-low-income trips. The difference between low-income and non-low-income usage of the 7-Day Pass is not statistically significant, so ***no disproportionate burden is found***.

Analysis of Potential Benefits from New Fare Caps

Assuming riders that use the 7-Day Pass switch to an e-card, they may benefit from the fare caps if they ride frequently enough. Overall, riders who use the 7-Day Pass and ride frequently enough to benefit from the new fare caps account for 0.5% of the weekday trips, including 0.9% of the minority trips and 0.4% of the non-minority trips. A higher percentage of minority trips where riders use the 7-Day Pass would experience the benefits of the new fare caps, and the difference is statistically significant, so ***no disparate impact is found***. Minority trips where riders use the 7-Day Pass are actually more likely to benefit from the new fare caps.

Riders who use the 7-Day Pass and ride frequently enough to benefit from the new fare caps account for 0.7% of the weekday low-income trips and 0.3% of the non-low-income trips. The difference between low-income and non-low-income usage of the 7-Day Pass, where riders travel frequently enough to benefit from the fare caps, is not statistically significant, so ***no disproportionate burden is found.***

Overall, riders who use the 7-Day Pass and ride frequently enough to benefit from the new fare caps account for 0.7% of the weekend trips, including 0.8% of the minority trips and 0.7% of the non-minority trips. The difference between minority and non-minority usage of the 7-Day Pass, where riders travel frequently enough to benefit from the fare caps, is not statistically significant, so ***no disparate impact is found.***

Riders who use the 7-Day Pass and ride frequently enough to benefit from the new fare caps account for 0.7% of the weekend low-income trips and 1.0% of the non-low-income trips. The difference between low-income and non-low-income usage of the 7-Day Pass, where riders travel frequently enough to benefit from the fare caps, is not statistically significant, so ***no disproportionate burden is found.***

Public Input on Elimination of 7-Day Pass

- No concerns were raised – new fare caps will benefit frequent riders that used the pass, enabling riders to purchase a monthly pass in even smaller increments.

Elimination of 14-Day Pass

Explanation

The 14-Day Pass was created in 2008 as an alternative for riders who could not afford the upfront cost of a monthly pass. This product has not been well-utilized since its inception, and would be eliminated for several reasons: first, because of new daily and monthly fare caps in place under e-fare; second, riders will be able to load value to e-cards in any increment \$5 or greater; and third, in order to simplify the fare structure. This e-fare policy was evaluated for the potential adverse effects on current pass users, as well as the potential benefits that current pass users will receive from the new fare caps.

Analysis of Potential Adverse Effects

TriMet evaluated this policy option for the potential adverse effects on riders that currently use the 14-Day Pass – namely, under the e-fare system these riders will need to pay per trip. If the riders transition to using e-cards, they will benefit from the new fare caps; however, the total cost for a 14-Day period (e.g., \$70 for Adult fares) will be higher than the current cost of a 14-Day Pass (e.g., \$51 for Adult fares). If the riders switch from the 14-Day Pass to cash single fares instead of e-fare, the total cost may be even higher depending on the number of trips they take.

Overall, riders use the 14-Day Pass for 1.3% of the weekday trips, including 1.5% of the minority trips and 1.1% of the non-minority trips. The difference between minority and non-minority usage of the 14-Day Pass is not statistically significant, so ***no disparate impact is found.***

Riders use the 14-Day Pass for 1.4% of the weekday low-income trips and 1.2% of the non-low-income trips. The difference between low-income and non-low-income usage of the 14-Day Pass is not statistically significant, so ***no disproportionate burden is found.***

Overall, riders use the 14-Day Pass for 1.8% of the weekend trips, including 2.3% of the minority trips and 1.7% of the non-minority trips. The difference between minority and non-minority usage of the 14-Day Pass is not statistically significant, so ***no disparate impact is found.***

Riders use the 14-Day Pass for 2.0% of the weekend low-income trips and 1.9% of the non-low-income trips. The difference between low-income and non-low-income usage of the 14-Day Pass is not statistically significant, so ***no disproportionate burden is found.***

Analysis of Potential Benefits from New Fare Caps

Assuming they switch to an e-card, riders that use the 14-Day Pass may benefit from the fare caps if they ride frequently enough. Overall, riders who use the 14-Day Pass and ride frequently enough to benefit from the new fare caps account for 0.7% of the weekday trips, including 0.7% of the minority trips and 0.6% of the non-minority trips. The difference between minority and non-minority usage of the 14-Day Pass, where riders travel frequently enough to benefit from the fare caps, is not statistically significant, so ***no disparate impact is found.***

Riders who use the 14-Day Pass and ride frequently enough to benefit from the new fare caps account for 0.8% of the weekday low-income trips and 0.7% of the non-low-income trips. The difference between low-income and non-low-income usage of the 14-Day Pass, where riders travel frequently enough to benefit from the fare caps, is not statistically significant, so ***no disproportionate burden is found.***

Overall, riders who use the 14-Day Pass and ride frequently enough to benefit from the new fare caps account for 1.0% of the weekend trips, including 1.2% of the minority trips and 0.9% of the non-minority trips. The difference between minority and non-minority usage of the 14-Day Pass, where riders travel frequently enough to benefit from the fare caps, is not statistically significant, so ***no disparate impact is found.***

Riders who use the 14-Day Pass and ride frequently enough to benefit from the new fare caps account for 1.2% of the weekend low-income trips and 0.9% of the non-low-income trips. The difference between low-income and non-low-income usage of the 14-Day Pass, where riders travel frequently enough to benefit from the fare caps, is not statistically significant, so ***no disproportionate burden is found.***

Public Input on Elimination of 14-Day Pass

- No concerns were raised – new fare caps will benefit frequent riders that used the pass, enabling riders to purchase a monthly pass in even smaller increments.

E-Fare Policy Options with Potential Disparate Impact/Disproportionate Burden Findings

The technical analysis identified three policy options that may have potential disparate impacts and disproportionate burdens:

- Automatic reload option for e-card using a credit/debit card (potential disparate benefit)
- New fare medium to pay fares using a contactless smart credit/debit card (potential disparate benefit)
- \$5 minimum load requirement for e-card

Additionally, through the public engagement process two issues in particular were frequently raised that were not identified in the technical analysis:

- \$3 e-card cost (impact on families in particular)
- Barriers to e-card registration, including concern about providing personal information and the requirement to provide an email address when registering the e-card

Automatic Reload Option for E-Card Using a Credit or Debit Card

Explanation

Under the e-fare system, riders will be able to link their credit or debit card to their e-card account online or through the e-fare mobile app to automatically reload value onto their e-card.

Analysis

TriMet evaluated this policy option for the potential benefits that riders will experience being able to automatically reload value onto their e-card. Riders must have a credit or debit card to take advantage of this benefit. Overall, riders have a pre-paid or regular debit or credit card for 77.1% of the weekday trips, including 68.1% of the minority trips and 81.7% of the non-minority trips. A lower percentage of minority trips would experience the benefits of being able to use their credit or debit card for automatic reload on their e-card. The difference is statistically significant, so ***a potential disparate impact is found.***

Riders have or use a pre-paid or regular debit or credit card for 72.6% of the weekday low-income trips and 90.5% of the non-low-income trips. A lower percentage of low-income trips would be able to benefit from automatic reload, and the difference is statistically significant, so ***a potential disproportionate burden is found.***

Overall, riders have or use a pre-paid or regular debit or credit card for 73.1% of the weekend trips, including 66.0% of the minority trips and 77.8% of the non-minority trips. A lower percentage of minority trips would experience the benefits of being able to automatically reload the e-card. The difference is statistically significant, so ***a potential disparate impact is found.***

Riders have or use a pre-paid or regular debit or credit card for 71.3% of the weekend low-income trips and 87.8% of the non-low-income trips. A lower percentage of low-income trips would experience the benefits of automatic reload on the e-card, and the difference is statistically significant, so ***a potential disproportionate burden is found.***

Those without access to the automatic reload feature will still be able to add value to e-cards using cash at participating retailers, or pay cash onboard.

Public Input on Automatic Reload Option for E-Card Using Credit/Debit Card

- Participants saw this option as a benefit, but unclear how much they would use it
- Ability to load value remotely is beneficial for direct service providers to assist clients
- Autoload option will help in managing multiple cards for a family

New Fare Medium to Pay Fares Using a Contactless Smart Credit or Debit Card

Explanation

The same technology that will enable riders to pay fares using e-cards will enable riders to utilize contactless smart credit or debit cards to pay fares. The fare amount will be charged directly to the rider's prepaid or credit/debit account.

Analysis

TriMet evaluated this policy option for the potential benefits that riders will experience using a contactless smart credit or debit card as a new fare medium. For this analysis, TriMet made the assumption that riders with regular credit/debit cards would be able to get a contactless smart credit/debit card. The same survey data on whether riders have a credit or debit card available, as described for the previous policy, was used to evaluate this policy option.

For weekday and weekend trips, lower percentages of both minority and low-income trips would be able to use their credit or debit card as a fare medium. The differences are statistically significant, so ***a potential disparate impact and disproportionate burden are found.***

Those without access to this fare payment option will still be able to add value to e-cards using cash at participating retailers, or pay cash onboard.

Public Input on New Fare Medium of Contactless Smart Credit/Debit Card

- Less popular fare medium – most participants indicated preference to use e-card

Costs Related to E-Cards

Explanation

At this time the TriMet Board is not voting on whether to eliminate paper tickets and passes. However, it is TriMet’s intention to phase out these products over a yet-to-be determined time period, depending on the successful adoption of the e-fare program. The intention is that eventually, retail outlets will carry only e-cards. Once this happens, riders who use paper tickets or passes will need to buy an e-card in order to get the same benefits of the paper fare products (i.e. the discount of a monthly pass or the option to pay for fares in bulk) and the new daily and monthly fare caps.

In order to cover the costs of producing e-cards and incentivize riders to retain them, riders will need to pay the \$3 one-time fee at retailers for new or replacement e-cards. When riders load value onto the e-cards they will need to load a minimum \$5, per current agreements with retail distributors.

TEAC Recommendation

To ensure transparency and accountability over when paper tickets and passes will be phased out, TriMet should prioritize the development of evaluation measures, and involve TEAC in the process of designing these measures.

Analysis

Overall, riders use paper tickets (from ticket books) or passes for 52.8% of the weekday trips, including 49.1% of the minority trips and 55.0% of the non-minority trips. A lower percentage of minority trips would be adversely affected by the \$3 e-card fee and \$5 minimum load requirement, and the difference is statistically significant, so ***no disparate impact is found***.

Riders use paper tickets or passes for 53.8% of the weekday low-income trips and 55.6% of the non-low-income trips. The difference between low-income and non-low-income usage of paper tickets and passes is not statistically significant, so ***no disproportionate burden is found***.

Overall, riders use paper tickets or passes for 50.1% of the weekend trips, including 45.6% of the minority trips and 52.4% of the non-minority trips. A lower percentage of minority trips would be adversely affected by the \$3 e-card fee and \$5 minimum load requirement, and the difference is statistically significant, so ***no disparate impact is found***.

Riders use paper tickets or passes for 48.9% of the weekend low-income trips and 54.0% of the non-low-income trips. A lower percentage of low-income trips would be adversely affected by the costs related to e-cards. The difference is statistically significant, so ***no disproportionate burden is found***.

\$5 Minimum Load Requirement

Riders whose fares are less than \$5 may also be adversely affected by the \$5 minimum load policy because it may limit their ability to access the e-fare system. Riders paying the Adult fare currently pay \$5 a day to take a round trip (where the return trip is outside the 2.5-hour transfer window), and will be able to continue to put this amount onto an e-card. However, some riders currently pay less than \$5 a day and could be negatively affected by the proposed minimum load requirement because they would need to pay more than their current one-way fare when adding value to the e-card. Riders that currently pay less than \$5 a day include riders that pay a single one-way cash fare per day (Adult, Youth, or Honored Citizen) and riders that use a Youth or Honored Citizen 1-Day Pass.

Overall, riders with fares less than \$5 account for 24.5% of the weekday trips, including 27.4% of the minority trips and 22.6% of the non-minority trips. A higher percentage of minority trips would be adversely affected by the \$5 minimum load requirement for e-cards. The difference is statistically significant, so ***a potential disparate impact is found.***

Riders with fares less than \$5 account for 30.6% of the weekday low-income trips and 18.3% of the non-low-income trips. A higher percentage of low-income trips would be adversely affected by the \$5 minimum load requirement, and the difference is statistically significant, so ***a potential disproportionate burden is found.***

Overall, riders with fares less than \$5 account for 37.2% of the weekend trips, including 38.4% of the minority trips and 36.2% of the non-minority trips. The difference between minority and non-minority fares less than \$5 is not statistically significant, so ***no disparate impact is found.***

Riders with fares less than \$5 account for 40.0% of the weekend low-income trips and 32.7% of the non-low-income trips. A higher percentage of low-income trips would be adversely affected by the \$5 minimum load requirement, and the difference is statistically significant, so ***a potential disproportionate burden is found.***

It is worth noting that the \$5 minimum load requirement will generally impact riders with fares less than \$5 more for weekend trips than for weekday trips, by about 10 percentage points.

Public Input on Costs Related to E-Cards

- Participants generally thought the \$3 cost was reasonable
- Some were concerned about the \$3 cost & \$5 minimum requirement as hardships for low-income individuals
- Participants were concerned about costs for families that need to buy a card (\$8 each including minimum load) for each family member
- Suggested a family card option
- Providing free e-cards during the initial period will help with the \$3 cost, but some concerns about when the period ends & options if riders lose their free e-card
- Suggestions to extend the initial period of free e-cards and ability to use value in e-fare account to buy a new e-card

Card Registration

Explanation

Registration of the e-card online or by phone will be an option for all TriMet riders, including those eligible for reduced fares. Registration would provide lost value protection and facilitate the automatic reload feature. TriMet provides translation services for callers who speak a language besides English, and this service will be available for e-card registration during customer service hours.

Analysis

At the time the fare equity analysis was completed, TriMet was unable to evaluate online registration of the e-card because data on riders' access to the internet was not available. TriMet will consider collecting this data through a future rider survey. Participants in the public engagement process did provide input on card registration, described below.

Public Input on Card Registration

- Participants saw lost value protection as a benefit, but were concerned about requirement to register card
- Concerns with technology barriers - particularly for elders - including lack of access to internet or an email address & computer literacy
- Concerns with language barriers
- Fear that law enforcement or immigration will have access to customer information & ridership patterns
- Concerns about system security & protecting personal information, including who will have access to the information and what limitations law enforcement will have in obtaining records
- Suggested mitigations: registration by paper, multilingual translation, accept mobile phone numbers in lieu of email addresses

Additional Public Input

Beyond the e-fare policy options analyzed in the technical analysis, the public engagement process led to additional input regarding e-fare and TriMet fares in general. This additional public input is summarized in Table 4.

Table 4: Other Public Input on E-Fare and General Fares

Policy/Feature	Public Feedback
Cash Fares	<ul style="list-style-type: none"> • It is important to continue accepting cash fares, particularly for low-income individuals and elders from immigrant and refugee populations. • Some participants indicated they will continue to pay by cash, rather than use another e-fare form of payment. Several members of TEAC did not see enough of an incentive to switch from cash to e-fare.
Methods for Adding Value to e-fare Account	<ul style="list-style-type: none"> • Meeting participants who indicated they would use the e-card are likely to load value at a store, online, or through the phone app, with retail stores being the most popular method. • Some participants expressed interest in being able to go negative on the e-card to address concerns about being stranded if the balance is too low.
Methods for Paying Fare Using e-fare	<ul style="list-style-type: none"> • Majority of participants indicated they would use the e-card, with the phone app and contactless credit card being less popular. • Concerns about card readers – suggestion to add onto train in case there are problems with card readers on platforms, and to address accessibility of card readers. • Concerns that using smartphone option will cause delays, as current phone app payment system does (wait while riders pull up app). • Suggested option of keychain size card. • Suggested ability to share a card with someone riding on card-owner’s behalf (e.g., family member running an errand).
Stored Value	<ul style="list-style-type: none"> • Participants liked that the stored value in the e-fare account would roll over month to month – then they won’t lose money if they ride less frequently one month.
Convenience	<ul style="list-style-type: none"> • Participants liked that they won’t need to carry exact change. • Participants liked that they can keep any change due to them (e.g., if they only have a \$5 bill to pay a one-way fare, the e-card will store the \$2.50 due in change). • Options to load value are convenient (stores, online, app). • E-card is durable (e.g., if washed in laundry).
Loss Protection	<ul style="list-style-type: none"> • Loss protection was seen as a significant benefit; however, participants voiced concerns regarding the registration necessary in order to receive this benefit. • Need good education on how loss protection works and how to access this benefit, particularly for people who do not understand English.
Options if Lose or Forget E-Card	<ul style="list-style-type: none"> • Participants would like the ability to mix use of card and phone app on a single account (pay by e-card or phone app). • Participants suggested a family card to address concern that children easily lose cards (and cumbersomeness of carrying multiple cards).

Policy/Feature	Public Feedback
Identification	<ul style="list-style-type: none"> • Suggested combining identification cards with the Honored Citizen and Youth Hop cards for convenience (e.g., combining Hop card with Honored Citizen ID will assist riders with developmental disabilities or limited English proficiency). • Suggested providing an alternative identification source for teens who want to use the Youth fare, but do not have a high school ID.
Education and Outreach on E-Fare	<ul style="list-style-type: none"> • Translation of materials into multiple languages is key – work with refugee resettlement agencies and health clinics to understand community language needs. • Suggested using visuals to help community members understand changes regardless of language and ability. • Suggested posting materials in transit vehicles and at transit stops. • Suggested working with CBOs, schools, places of worship, and ethnically specialized stores to distribute e-fare information. • Suggested working with diverse communities during the 2016 trial period to analyze different problems that may arise for different communities. • Suggested promoting information on television and online.
Initial Distribution of Free E-Cards	<ul style="list-style-type: none"> • Suggested working with CBOs, schools, and places of worship to distribute cards to those most in need. • Suggested distributing at retail outlets. • Suggested distributing at TriMet transit centers, stations, and on vehicles.
E-Fare System Reliability	<ul style="list-style-type: none"> • Suggested providing a mechanism through which riders can contest system mistakes.
Fare Costs	<ul style="list-style-type: none"> • Transit fares in general are a hardship for low-income riders and those with larger families. • Several participants suggested a low-income fare – the e-fare account may help establish low-income status.
Fare Enforcement	<ul style="list-style-type: none"> • Some participants described experiences of discrimination by TriMet drivers and fare enforcement officers related to race and age (e.g., teenage parents scrutinized for Youth fares). • Participants perceived racial profiling in fare enforcement, results in escalated situations and unnecessary ticketing.
Decision-making Process	<ul style="list-style-type: none"> • CBOs would like to build a stronger partnership with TriMet to identify implementable solutions to address concerns for their constituents.

Mitigations

Some of the mitigations described below directly address the e-fare policy options identified with potential Title VI impacts, while other mitigations address the e-fare related concerns identified in the public engagement process. TriMet will take into account the other input collected on general fares and fare enforcement in future decisions regarding the fare system.

Early Mitigations

As described previously, TriMet staff heard public input on the initial e-fare policies during the planning process, and already made some policy changes that were considered early mitigations:

- Originally considered \$3.50 fee for new or replacement e-cards, and reduced the proposed fee to \$3.
- Originally considered a pricing differential for fares purchased via e-fare to encourage adoption, but opted to keep cash fares and e-fare equitable.
- Originally considered eliminating paper transfers for riders who pay by cash/ticket, and decided to retain paper transfers.
- Originally considered eliminating the sale of paper 1-Day passes onboard buses, and decided to retain ticket printers on the bus so the paper 1-Day pass will still be available.
- Originally e-card registration was only available online, but created option to register e-card anonymously by telephone without requiring an email address. TriMet customer service language interpretation services will be available for card registration.

Recommended Mitigations

After reviewing additional input collected through the Title VI public engagement process, TriMet staff recommends implementing several mitigation measures, described below.

➤ ***Distribute free e-cards, targeting minority and low-income riders***

The goal of this mitigation is to address the following:

- \$3 e-card cost (impact on families in particular)
- New fare medium using contactless smart credit/debit card (disparate benefit)

Based on public input, the e-card will be the preferred fare medium. TriMet will distribute at least 100,000 free e-cards during an initial period, with a strategic effort to reach minority and low-income individuals through CBOs. Additionally the agency will provide free e-cards in the longer term through its Access Transit fare programs. This mitigation will provide many riders, including transit-dependent individuals, with direct access to the new e-fare system.

➤ **Continue expanding the retail network, specifically in minority and low-income neighborhoods**

The goal of this mitigation is to address the following:

- Automatic reload option for e-card (disparate benefit)
- New fare medium using contactless smart credit/debit card (disparate benefit)

Adding value to the e-card at retail stores was the most popular choice by outreach participants, followed by adding value online and through the e-fare mobile app. Suggested additional locations from the public engagement sessions included libraries, schools, juvenile detention centers, domestic violence shelters, social service agencies, convenient stores, coffee shops, major bus stops, and train stations in areas with less retail options. By making the expanded retail network as convenient as possible for minority and low-income riders to load value onto e-cards, this mitigation is meant to help address the issue of access for unbanked riders.

TEAC Recommendation

Create a culturally informed, multilingual public awareness campaign partnering with retail outlet locations to assist communities in understanding that TriMet fares can be purchased there (e.g., language-specific signage saying “Reload TriMet fares here”). Also provide additional information on key FAQ’s related to e-fare.

➤ **Implement a lower minimum load at certain locations**

The goal of this mitigation is to address the finding of a potential disparate impact/disproportionate burden associated with the \$5 minimum load.

Attendees at the CBO meetings said they could afford the \$5, but a few attendees expressed concern that the requirement could be a hardship for other low-income individuals and families. Participants noted that for some individuals it is difficult to have enough money to get through the day, and holding on to the extra \$2.50 (if they are only taking a one-way trip) can make a big difference.

The \$5 minimum load is currently a stipulation that many of the stores in its retail vendor contract require to participate. While TriMet has less flexibility in the minimum load requirement for the contracted retailers, it has the option of working with other community partners that could have a lower minimum load requirement. TriMet could also implement a lower minimum load requirement at its Pioneer Square Ticket office.

It should also be reiterated that riders may continue to purchase a single ticket or day pass, for \$5 or less, just as they do today.

➤ **Explore opportunities to address affordability for families**

The goal of this mitigation is to find ways to address a common concern raised during outreach that low-income families may have difficulty accessing e-fare due to the \$3 e-card cost and \$5 minimum load.

Participants often suggested a family card option as a way to address this, but this option is not compatible with offering fare capping. It would require a new family fare, which TriMet does not currently have. However there may be other ways in addition to provision of free e-cards that TriMet may be able to improve access to e-fare for low-income families.

➤ **Enlist CBOs as pilot participants in 2016**

The goal of this mitigation is to increase awareness and access to e-fare for minority and low-income individuals, and to support organizations programmatically in terms of fare distribution. TriMet will also need to provide training and technical assistance as part of this effort.

E-Fare Benefits

TriMet also considers some of the basic features of e-fare as benefits for all riders, including minority and low-income individuals. These features complement the mitigations described above:

- **Fare caps** – essentially allow riders to purchase a monthly pass one ride at a time, reducing the up-front expense (currently \$100 for an Adult Monthly Pass, \$28 for a Youth or Honored Citizen Monthly Pass).
- **Lost card protection** – available to riders who register their e-card online. Helps riders reduce the risk associated with buying a paper pass, which cannot be replaced if lost.
- **Faster boarding** – e-fare should speed up the boarding process on the bus, if riders do not have to find exact change or wait for others to do so, resulting in a more reliable bus system.

Appendix A

Fare Equity Analysis Methodology

Fare Equity Analysis Methodology

In 2015 TriMet used the following data and methodologies to conduct the fare equity analysis of policy changes related to its migration to the e-fare system.

TriMet Data

TriMet used 2012 data from a rider survey on fares for the fare equity analysis. The survey was conducted from October to December 2012 and included 16,982 responses. The data represented one-way trips, not individual riders, and was weighted to adjust for transfers and ridership by route type. Given different ridership patterns, weekday trips were evaluated separately from weekend trips.

The 2012 survey collected the following information pertinent to the fare equity analysis:

- Transfers
- Fare types (Adult, Youth, Honored Citizen, LIFT)
- Fare products (Tickets, Passes)
- Use of single-fare payment for one-way trip or round-trip
- Number of trips taken on 1-day pass
- Number of trips taken in last month
- Location that fare was purchased
- Availability of checking or savings account
- Availability of regular debit or credit card
- Ethnicity
- Income
- English proficiency
- Language spoken at home

The survey data on ethnicity was used to evaluate the potential impacts on minority trips, where “minority” was defined as all races/ethnicities besides white, non-Hispanic. The survey data on income was used to evaluate the potential impacts on low-income trips, where “low-income” was defined as at or below 150% of the federal poverty level set by the U.S. Department of Health and Human Services.

A copy of the 2012 survey instrument is included at the end of this appendix. Note that the survey data on rider demographics (percentage minority, low-income, and limited English proficient) differed from the service area demographics that TriMet has identified using U.S. Census and American Community Survey data. The fare equity analysis used the survey data on minority and low-income trips.

Methodologies

It is important for fare equity analyses to examine both scenarios where minority and low-income riders may bear a greater share of negative impacts, or experience a lesser share of positive impacts than non-minority and non-low-income riders. TriMet evaluated draft e-fare policies for both. The methodologies TriMet used to evaluate the draft e-fare policy options are described below. While most of the policy options could be analyzed using the rider survey data, the increase in retail outlets was analyzed using demographic data and geographic information system (GIS) maps.

TriMet's Disparate Impact and Disproportionate Burden Policies

TriMet applied the following policies to determine if the draft e-fare policies may result in possible disparate impacts on minority populations or disproportionate burdens on low-income populations. TriMet compared the percentage of impacted trips by minority and low-income riders with those of non-minority and non-low-income riders.

Disparate Impact Policy – Minority Populations

Transit providers are required to develop a policy for measuring disparate impacts. The policy establishes a threshold for determining when the adverse effects of fare changes are borne disproportionately by minority populations. The disparate impact threshold must be applied uniformly, regardless of mode, and cannot be altered until the next Title VI Program submission. The following is TriMet's disparate impact policy regarding fare changes, established in its 2013 Title VI Program:

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 – Low-income Populations

While low-income populations are not a protected class under Title VI, the Federal Transit Administration requires transit providers to evaluate proposed fare changes to determine the relative impact on low-income populations. Transit providers are required to develop a policy for measuring disproportionate burdens on low-income populations, which establishes a threshold for determining when the adverse effects of fare changes are borne disproportionately by low-income populations. The following is TriMet's disproportionate burden policy regarding fare changes, established in its 2013 Title VI Program:

As defined by TriMet, a person whose household income is at or below 150 percent of the poverty level set by the U.S. Department of Health and Human Services is considered low-income.

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.

TriMet's disparate impact and disproportionate burden policies define differences in the use of fare options between minority/low-income and non-minority/non-low-income populations as those that are statistically significant at the 95 percent confidence level. Therefore, where the results showed differences that were not statistically significant, TriMet found no disparate impact or disproportionate burden.

Methodologies Using Rider Survey Data

Policies that Do Not Directly Impact Trip Costs

Most of the potential policies will not directly impact trip costs for riders. TriMet evaluated the following policies by examining survey data on the trips that will be impacted by the specific policy:

- Elimination of mail-order purchasing of fare media
- Automatic reload option for e-card using a credit/debit card
- New fare medium to pay fares using contactless smart credit/debit card
- Costs related to e-cards (\$3 card cost and \$5 minimum load requirement)
- Elimination of 7-Day Pass (adverse effects)
- Elimination of 14-Day Pass (adverse effects)

The minority trips affected by each policy were compared with the impacted non-minority trips, and the low-income trips affected by the policy were compared with the impacted non-low-income trips. TriMet used the following step by step procedures:

1. Construct a table that lists each potential fare policy. Identify the numbers and percentages of overall, minority, non-minority, low-income, and non-low-income trips impacted by the specific policy.
2. For each potential policy compare the percentages of impacted minority and non-minority trips and the percentages of impacted low-income and non-low-income trips.

-
- a. TriMet identifies a potential disparate impact if the percentage of impacted minority trips exceeds that of impacted non-minority trips, and the difference is statistically significant at the 95 percent confidence level.
 - b. TriMet identifies a potential disproportionate burden if the percentage of impacted low-income trips exceeds that of impacted non-low-income trips, and the difference is statistically significant at the 95 percent confidence level.

Policies Where Trips May Benefit from Fare Caps

A few potential policies will not directly impact trip costs for riders, but required additional evaluation in terms of the benefits that riders may receive from the daily and monthly fare caps that will be available for e-fares only. TriMet evaluated the following policies by examining survey data on the number of trips per month that riders currently make:

- New fare caps available with e-fare
- Elimination of 7-Day Pass (benefits of fare caps)
- Elimination of 14-Day Pass (benefits of fare caps)

If the number of trips per month was greater than a certain threshold, then the rider may benefit by paying less per trip than they do using their current fare product. Note that trips can only receive the benefit of fare caps if paying by e-card, Apple or Android Pay on their smartphone (daily cap only), or a contactless smart credit/debit card (daily cap only) once the e-fare system is in place. TriMet used the following step by step procedures to evaluate policy options where trips may benefit from the fare caps:

1. Construct a table of survey data for users of the specific fare product (cash users to evaluate the daily/monthly fare cap benefit and pass users to evaluate eliminating the 7-day and 14-day passes), including fare product (cash, passes), fare type (Adult, Youth, etc.), number of trips taken per month, ethnicity, and income.
2. To evaluate riders that may benefit from the fare caps, select a sub-set of the survey data where the number of trips per month exceeds the following thresholds depending on fare type:
 - Adult, 40 trips/month
 - Honored Citizen, 26 trips/month
 - Youth, 22.4 trips/month

*These thresholds were calculated by dividing the current 30-Day Pass price by the current single ride 2 1/2-Hour Ticket price. Riders typically take at least this number of trips to justify the upfront cost of the pass, where each trip equals the cost of the 2 1/2-Hour Ticket. Riders that ride more frequently than these thresholds benefit more

from the pass as the cost per trip decreases with each additional trip taken. The monthly and daily fare caps will provide this benefit to e-fare users without the upfront cost of the pass required.

3. Compare the percentages of minority and non-minority trips and the percentages of low-income and non-low-income trips.
 - a. TriMet identifies a potential disparate impact if the percentage of non-minority trips benefiting from the fare caps exceeds that of minority trips, and the difference is statistically significant at the 95 percent confidence level.
 - b. TriMet identifies a potential disproportionate burden if the percentage of non-low-income trips benefiting from the fare caps exceeds that of low-income trips, and the difference is statistically significant at the 95 percent confidence level.

At the time the fare equity analysis was conducted, TriMet was unable to evaluate the policy option of online registration of the e-card, which provides lost value protection and facilitates automatic reloads, because data on trips' use of the internet was not available.

Methodology Using Demographic Data and GIS

TriMet used demographic data and GIS maps to evaluate the increase to more than 500 retail outlets where riders may purchase fares. This policy will have beneficial impacts, so TriMet analyzed data to determine if minority and low-income populations will receive at least their fair share of benefits. TriMet conducted the equity analyses by mapping the locations of the retail outlets, overlaid on the minority and low-income populations within the service district. TriMet compared the percentages of minority/low-income populations with access to the retail outlets to the percentages of non-minority/non-low-income populations with access. TriMet followed these step by step procedures:

1. Create a map each of minority and low-income populations within the service district, using data at the Census block group level from the American Community Survey.
2. Map the locations of the retail outlets, and overlay on the minority and low-income maps.
 - a. Both the current and proposed network of retail outlets will be mapped to evaluate the change in access for minority and low-income populations.
3. Create one-half mile buffers around these locations, and select the Census block groups where the centroid of the block group falls within the buffers. The populations in these block groups are deemed to have access to the retail locations.

-
- a. Merge the buffers for the current and additional retail outlets into a combined access buffer to evaluate access to the full proposed network.
 4. In the selected Census block groups, identify the total overall, minority, non-minority, low-income, and non-low-income populations.
 5. Calculate the percentage of minorities with access to the current and proposed networks by dividing the minority population with access by the total minority population in the service district. Do the same for the non-minority, low-income, and non-low-income populations.
 - a. TriMet identifies a potential disparate impact if the percentage of minorities with access is lower than the percentage of non-minorities with access.
 - b. TriMet identifies a potential disproportionate burden if the percentage of the low-income population with access is lower than the percentage of the non-low-income population with access.
 6. Compare the change (percentage points) in the percentage of minorities with access with the change in the percentage of non-minorities with access. Do the same for the low-income and non-low income populations.

Alternatives and Mitigation

If potential disparate impacts on minority riders are found, TriMet will analyze alternatives to determine if any exist that would serve legitimate program goals, but with less of a disparate effect based on race, color, or national origin. If potential disproportionate burdens on low-income riders are found, TriMet will take steps to avoid, minimize, or mitigate impacts where practicable, including describing available alternatives.

TriMet Rider Survey

Please fill out this form even if you have already received one on another bus or train.

Dear Rider: TriMet would like to know about the trip you are currently making. Please answer the following questions and return to the surveyor or drop it in the mail.

1. What line are you riding on now? Line # _____ Line name _____							
2. Do you have to transfer to or from a different line to make this trip in one direction? 01 <input type="checkbox"/> No <input type="checkbox"/> Yes. If Yes, how many times? 02 <input type="checkbox"/> 1 time 03 <input type="checkbox"/> 2 times 04 <input type="checkbox"/> 3 or more times							
3. If you must transfer to make this trip, what lines do you transfer to or from? (not including the bus or train you are on now) Line # _____ Line name _____ Line # _____ Line name _____ <input type="checkbox"/> MAX <input type="checkbox"/> WES <input type="checkbox"/> Portland Streetcar <input type="checkbox"/> C-TRAN route # _____ <input type="checkbox"/> SAM Transit _____							
4. How did you pay your fare for this trip? (check one) 01 <input type="checkbox"/> TriMet fare 02 <input type="checkbox"/> C-TRAN fare 03 <input type="checkbox"/> Portland Streetcar fare If Streetcar, which type of fare? 01 <input type="checkbox"/> 2-Hour Ticket (\$1) 02 <input type="checkbox"/> Portland Streetcar Annual Pass (\$150)							
5. Which TriMet fare? (Please check one)							
	01 CASH (2-Hr Ticket)	02 TICKET (Book of 10)	03 1-DAY PASS	04 7-DAY PASS	05 14-DAY PASS	06 MONTHLY/ 30-Day PASS	07 ANNUAL PASS
Adult	01 <input type="checkbox"/> \$2.50	01 <input type="checkbox"/> \$25.00	01 <input type="checkbox"/> \$5.00	01 <input type="checkbox"/> \$26.00	01 <input type="checkbox"/> \$51.00	01 <input type="checkbox"/> \$100.00	01 <input type="checkbox"/> \$1,100.00
Youth/Student	02 <input type="checkbox"/> \$1.65	02 <input type="checkbox"/> \$16.50	02 <input type="checkbox"/> \$3.30	02 <input type="checkbox"/> \$ 8.00	02 <input type="checkbox"/> \$15.50	02 <input type="checkbox"/> \$ 30.00	02 <input type="checkbox"/> \$ 330.00
Honored Citizen/STAR	03 <input type="checkbox"/> \$1.00	03 <input type="checkbox"/> \$10.00	03 <input type="checkbox"/> \$2.00	03 <input type="checkbox"/> \$ 7.00	03 <input type="checkbox"/> \$13.50	03 <input type="checkbox"/> \$ 26.00	03 <input type="checkbox"/> \$ 286.00
LIFT	04 <input type="checkbox"/> \$2.15	04 <input type="checkbox"/> \$21.50			04 <input type="checkbox"/> \$31.50	04 <input type="checkbox"/> \$ 62.00	04 <input type="checkbox"/> \$ 682.00
05 <input type="checkbox"/> Employee ID with TriMet sticker							
06 <input type="checkbox"/> College ID with TriMet sticker							
07 <input type="checkbox"/> High school ID with TriMet sticker and/or embedded with TriMet logo							
08 <input type="checkbox"/> Honored Citizen Downtown Pass							
09 <input type="checkbox"/> Other _____							
6. Is your single-fare payment being used for a one-way or a round-trip? 01 <input type="checkbox"/> One-way trip 02 <input type="checkbox"/> Round-trip							
7. If you are using a 1-Day Pass, how many one-way trips will you make on it today? _____							
8. Where did you buy your fare for this trip?							
01 <input type="checkbox"/> Onboard the bus		05 <input type="checkbox"/> Pass by Mail		09 <input type="checkbox"/> Social Service Agency Purchased for me			
02 <input type="checkbox"/> Ticket Vending Machine		06 <input type="checkbox"/> School or Place of Employment		10 <input type="checkbox"/> Other _____			
03 <input type="checkbox"/> TriMet Ticket Office		07 <input type="checkbox"/> Online					
04 <input type="checkbox"/> Retail Store		08 <input type="checkbox"/> Purchased on Streetcar					
9. Do you have a vehicle you could have used to make this trip either as the driver or as a passenger? 01 <input type="checkbox"/> Yes 02 <input type="checkbox"/> No							
10. Do you have a checking or savings account? 01 <input type="checkbox"/> Yes 02 <input type="checkbox"/> No							
11. Do you have or use a pre-paid or regular debit or credit card?							
01 <input type="checkbox"/> Yes (check all that apply)		01 <input type="checkbox"/> Pre-paid card		02 <input type="checkbox"/> Bank-issued debit card		03 <input type="checkbox"/> Bank-issued credit card	
02 <input type="checkbox"/> No							
12. Including yourself, how many people live in your household? _____							
13. How many trips have you taken on a TriMet bus/MAX in the last month? (count each direction as one trip) _____							
14. What is your age? _____							
15. Are you a college student? 01 <input type="checkbox"/> Yes, full-time 02 <input type="checkbox"/> Yes, part-time 03 <input type="checkbox"/> No							
If you are a college student, which college?		01 <input type="checkbox"/> PSU		02 <input type="checkbox"/> PCC		03 <input type="checkbox"/> Other _____	
16. Are you: (check one) 01 <input type="checkbox"/> Asian/Pacific Islander 03 <input type="checkbox"/> Caucasian/White 05 <input type="checkbox"/> Multi-racial/bi-racial 07 <input type="checkbox"/> Other _____							
		02 <input type="checkbox"/> African American/Black		04 <input type="checkbox"/> Hispanic/Latino		06 <input type="checkbox"/> Native American Indian	
17. What was your total annual household income before taxes in 2011? (check one)							
01 <input type="checkbox"/> Under \$10,000		03 <input type="checkbox"/> \$20,000 to \$29,999		05 <input type="checkbox"/> \$40,000 to \$49,999		07 <input type="checkbox"/> \$60,000 to \$69,999	
02 <input type="checkbox"/> \$10,000 to \$19,999		04 <input type="checkbox"/> \$30,000 to \$39,999		06 <input type="checkbox"/> \$50,000 to \$59,999		08 <input type="checkbox"/> \$70,000 or more	
18. Do you speak a language other than English at home? 01 <input type="checkbox"/> Yes If yes, what language is this? _____ 02 <input type="checkbox"/> No							
Quý vị có nói một ngôn ngữ nào khác ngoài tiếng Anh ở nhà không?				05 <input type="checkbox"/> Có		06 <input type="checkbox"/> Không	
除了英文外，您在家還說其他的語言嗎？				07 <input type="checkbox"/> 是		08 <input type="checkbox"/> 否	
Разговариваете ли вы на каком-либо еще языке, кроме английского, дома?				09 <input type="checkbox"/> Да		10 <input type="checkbox"/> Нет	
집에서 영어가 아닌 다른 언어를 사용하십니까?				11 <input type="checkbox"/> 예		12 <input type="checkbox"/> 아니오	
19. How well do you speak English? 01 <input type="checkbox"/> Very well 02 <input type="checkbox"/> Well 03 <input type="checkbox"/> Not well 04 <input type="checkbox"/> Not at all							
Quý vị nói tiếng Anh khá không?		09 <input type="checkbox"/> Rất khá		10 <input type="checkbox"/> Khá		11 <input type="checkbox"/> Không khá	
您說英文的程度如何？		13 <input type="checkbox"/> 非常好		14 <input type="checkbox"/> 好		15 <input type="checkbox"/> 好	
Как хорошо вы разговариваете на английском языке?		17 <input type="checkbox"/> Очень хорошо		18 <input type="checkbox"/> Достаточно хорошо		19 <input type="checkbox"/> Не очень хорошо	
영어로 어느 정도로 잘 구사하십니까?		21 <input type="checkbox"/> 대단히 잘한다		22 <input type="checkbox"/> 잘한다		23 <input type="checkbox"/> 잘하지 못한다	
						20 <input type="checkbox"/> Вообще не говорю	
						24 <input type="checkbox"/> 전혀 하지 못한다	

Please return to surveyor or fold, tape 1" from each edge and mail postage-paid. Thank you for taking time to fill out this survey.



BUSINESS REPLY MAIL

FIRST-CLASS MAIL PERMIT NO. 596 PORTLAND OR

POSTAGE WILL BE PAID BY THE ADDRESSEE

TRIMET
ATTN: FINANCIAL PLANNING
4012 S.E. 17TH AVENUE
PORTLAND, OR 97202-9911



Encuesta a los pasajeros de TriMet

Favor de llenar este formulario aún si ya lo recibió en otro tren o autobús.

Estimado Pasajero: TriMet necesita saber algunos datos sobre el viaje que hace en estos momentos. Favor de contestar las siguientes preguntas. Cuando termine entréguelas al encuestador o envíelas por correo.

1. ¿En que línea viaja en estos momentos?		Línea # _____	Nombre de la ruta/línea _____							
2. ¿Necesita hacer trasbordos de una línea a otra para completar este viaje en una dirección?										
01	<input type="checkbox"/> No	<input type="checkbox"/> Sí. Si la respuesta es sí, ¿cuántas veces?	02	<input type="checkbox"/> 1 vez	03	<input type="checkbox"/> 2 veces	04	<input type="checkbox"/> 3 veces o más		
3. Si hace trasbordos en este viaje, ¿de qué líneas a qué líneas trasborda? (no incluya el tren o autobús en que ahora viaja)										
Línea # _____	Nombre de la ruta/línea _____		Línea # _____	Nombre de la ruta/línea _____						
<input type="checkbox"/> MAX	<input type="checkbox"/> WES	<input type="checkbox"/> Portland Streetcar	<input type="checkbox"/> Ruta C-TRAN # _____	<input type="checkbox"/> Transporte SAM _____						
4. ¿Cómo pagó este viaje? (marque una)		01	<input type="checkbox"/> Tarifa de TriMet	02	<input type="checkbox"/> Tarifa de C-TRAN	03	<input type="checkbox"/> Tarifa de Portland Streetcar			
Si pagó pasaje de Streetcar, ¿qué tipo de pasaje?		01	<input type="checkbox"/> Boleto de 2-horas (\$1)	02	<input type="checkbox"/> Pase Anual Portland Streetcar (\$150)					
5. ¿Qué usó para pagar en TriMet? (marque una)										
	01 EFFECTIVO (boleto de 2-horas)	02 BOLETO (talonario de 10)	03 PASE de 1-DÍA	04 PASE de 7-DÍAS	05 PASE de 14-DÍAS	06 PASE de MENSUAL/30-DÍAS	07 PASE ANUAL			
Adultos	01 <input type="checkbox"/> \$2.50	01 <input type="checkbox"/> \$25.00	01 <input type="checkbox"/> \$5.00	01 <input type="checkbox"/> \$26.00	01 <input type="checkbox"/> \$51.00	01 <input type="checkbox"/> \$100.00	01 <input type="checkbox"/> \$1,100.00			
Joven/Estudiante	02 <input type="checkbox"/> \$1.65	02 <input type="checkbox"/> \$16.50	02 <input type="checkbox"/> \$3.30	02 <input type="checkbox"/> \$ 8.00	02 <input type="checkbox"/> \$15.50	02 <input type="checkbox"/> \$ 30.00	02 <input type="checkbox"/> \$ 330.00			
Ciudadano Honorable/STAR	03 <input type="checkbox"/> \$1.00	03 <input type="checkbox"/> \$10.00	03 <input type="checkbox"/> \$2.00	03 <input type="checkbox"/> \$ 7.00	03 <input type="checkbox"/> \$13.50	03 <input type="checkbox"/> \$ 26.00	03 <input type="checkbox"/> \$ 286.00			
LIFT (servicio de transporte para discapacitados)	04 <input type="checkbox"/> \$2.15	04 <input type="checkbox"/> \$21.50		04 <input type="checkbox"/> \$31.50	04 <input type="checkbox"/> \$ 62.00	04 <input type="checkbox"/> \$ 682.00				
05	<input type="checkbox"/> Identificación de empleado con etiqueta de TriMet									
06	<input type="checkbox"/> Identificación de la universidad con etiqueta de TriMet									
07	<input type="checkbox"/> Identificación de Escuela Preparatoria con etiqueta de TriMet									
08	<input type="checkbox"/> Pase de Ciudadano Honorable para el centro de la ciudad									
09	<input type="checkbox"/> Otra _____									
6. Si pagó un solo pasaje, ¿es para un viaje de ida o de ida y vuelta?		01	<input type="checkbox"/> Viaje de ida			02	<input type="checkbox"/> Viaje de ida y vuelta			
7. Si viaja con un pase de 1 día, ¿cuántos viajes sencillos hará con él el día de hoy? _____										
8. ¿Dónde compró su pasaje para este viaje?										
01	<input type="checkbox"/> A bordo del autobús		05	<input type="checkbox"/> Pase por correo		09	<input type="checkbox"/> Una agencia de servicio social lo compró para mí			
02	<input type="checkbox"/> En una máquina expendedora de boletos		06	<input type="checkbox"/> En la escuela o el lugar de trabajo		10	<input type="checkbox"/> Otro _____			
03	<input type="checkbox"/> En una oficina de boletos de TriMet		07	<input type="checkbox"/> En línea						
04	<input type="checkbox"/> En una tienda		08	<input type="checkbox"/> Lo compré en el tranvía						
9. ¿Tiene un vehículo que podría haber usado para hacer este viaje ya sea como conductor o como pasajero?		01	<input type="checkbox"/> Sí			02	<input type="checkbox"/> No			
10. ¿Tiene cuenta bancaria de ahorros o cheques?		01	<input type="checkbox"/> Sí			02	<input type="checkbox"/> No			
11. ¿Tiene o usa tarjeta prepagada, tarjeta de débito o tarjeta de crédito?										
01	<input type="checkbox"/> Sí (marque todo lo que aplica)		01	<input type="checkbox"/> Tarjeta prepagada		02	<input type="checkbox"/> Tarjeta bancaria de débito			
02	<input type="checkbox"/> No		03	<input type="checkbox"/> Tarjeta bancaria de crédito						
12. Incluyendo a usted, ¿Cuántas personas viven en su hogar? _____										
13. En los últimos 30 días, ¿cuántas veces se ha transportado en autobuses de TriMet/MAX? (cuenta cada dirección como un recorrido) _____										
14. ¿Cuál es su edad? _____										
15. ¿Es Ud. estudiante universitario?		01	<input type="checkbox"/> Sí, a tiempo completo		02	<input type="checkbox"/> Sí, a medio tiempo				
Si es Ud. estudiante universitario, ¿a qué universidad o college asiste?		01	<input type="checkbox"/> PSU		02	<input type="checkbox"/> PCC				
		03	<input type="checkbox"/> No		03	<input type="checkbox"/> Otro _____				
16. ¿Es Ud.: (marque sólo uno)										
01	<input type="checkbox"/> Asiático/De las Islas del Pacífico		03	<input type="checkbox"/> Caucásico/Blanco		05	<input type="checkbox"/> Multiracial/biracial			
02	<input type="checkbox"/> Afroamericano/Negro		04	<input type="checkbox"/> Hispano/Latino		06	<input type="checkbox"/> Nativo Americano			
17. ¿Cuál fue el ingreso anual de su hogar antes del pago de impuestos para el año 2011? (marque un cuadro)										
01	<input type="checkbox"/> Menos de \$10,000		03	<input type="checkbox"/> \$20,000 a \$29,999		05	<input type="checkbox"/> \$40,000 a \$49,999			
02	<input type="checkbox"/> \$10,000 a \$19,999		04	<input type="checkbox"/> \$30,000 a \$39,999		07	<input type="checkbox"/> \$60,000 a \$69,999			
			06	<input type="checkbox"/> \$50,000 a \$59,999		08	<input type="checkbox"/> \$70,000 o más			
			09	<input type="checkbox"/> No sé						
18. ¿Habla un idioma que no sea inglés?		03	<input type="checkbox"/> Sí		¿Qué idioma es ese? _____		04	<input type="checkbox"/> No		
19. ¿Cuán bien habla el inglés?		05	<input type="checkbox"/> Muy bien		06	<input type="checkbox"/> Bien		07	<input type="checkbox"/> No bien	
			08	<input type="checkbox"/> No hablo inglés						

Appendix B

Technical Analysis Results – Summary and Data Tables

Technical Analysis – Summary Tables

Table 1. Equity Analysis Results for Potential Impacts on Weekday Trips

Policy Area	E-Fare Policy Option	Impacted Trips ¹					Potential Disparate Impact?	Potential Disproportionate Burden?	Policy more beneficial to:	
		% Overall	% Minority	% Non-Minority	% Low-Income	% Non-Low-Income			Minority Trips	Low-Income Trips
Access	Eliminate mailing fare media (passes)	2.4%	2.1%	2.4%	1.9%	3.1%	--	--	n/a	n/a
	Increase to 500+ retail outlets ² (Access to Proposed Network)	50.7%	57.0%	48.4%	63.1%	47.2%	--	--	✓	✓
	Increase to 500+ retail outlets ² (Growth in Access)	32.4%	36.3%	30.9%	40.0%	30.3%	--	--	✓	✓
Payment	Automatic reload option for e-card using credit/debit card	77.1%	68.1%	81.7%	72.6%	90.5%	✓	✓	--	--
Fare Medium	New fare medium - contactless smart credit/debit card	77.1%	68.1%	81.7%	72.6%	90.5%	✓	✓	--	--
Price	Costs for e-card, (\$3 cost, \$5 min. load)	52.8%	49.1%	55.0%	53.8%	55.6%	--	--	n/a	n/a
	\$5 minimum load on e-card (Impacts on trips where fare is < \$5)	24.5%	27.4%	22.6%	30.6%	18.3%	✓	✓	n/a	n/a
	New fare caps available with e-fare	4.3%	5.0%	3.8%	6.6%	2.6%	--	--	--	✓
Fare Products	Eliminate 7-Day Pass (adverse effect)	1.3%	1.8%	1.1%	1.3%	1.3%	--	--	n/a	n/a
	Eliminate 7-Day Pass (fare cap benefit)	0.5%	0.9%	0.4%	0.7%	0.3%	--	--	✓	--
	Eliminate 14-Day Pass (adverse effect)	1.3%	1.5%	1.1%	1.4%	1.2%	--	--	n/a	n/a
	Eliminate 14-Day Pass (fare cap benefit)	0.7%	0.7%	0.6%	0.8%	0.7%	--	--	--	--

¹Except for the policy on increasing retail outlets, which was analyzed using Census demographic data and represents individuals, not trips.

²TriMet analyzed the policy to increase retail outlets by looking at impacts on the populations within the service district, and did not differentiate between weekday and weekend trips.

Table 2. Equity Analysis Results for Potential Impacts on Weekend Trips

Policy Area	E-Fare Policy Option	Impacted Trips					Potential Disparate Impact?	Potential Disproportionate Burden?	Policy more beneficial to:	
		% Overall	% Minority	% Non-Minority	% Low-Income	% Non-Low-Income			Minority Trips	Low-Income Trips
Access	Eliminate mailing fare media (passes)	1.6%	1.6%	1.5%	1.2%	1.7%	--	--	n/a	n/a
Payment	Automatic reload option for e-card using credit/debit card	73.1%	66.0%	77.8%	71.3%	87.8%	✓	✓	--	--
Fare Medium	New fare medium - contactless smart credit/debit card	73.1%	66.0%	77.8%	71.3%	87.8%	✓	✓	--	--
Price	Costs for e-card, (\$3 cost, \$5 min. load)	50.1%	45.6%	52.4%	48.9%	54.0%	--	--	n/a	n/a
	\$5 minimum load on e-card (Impacts on trips where fare is < \$5)	37.2%	38.4%	36.2%	40.0%	32.7%	--	✓	n/a	n/a
	New fare caps available with e-fare	7.4%	9.0%	6.8%	10.0%	4.5%	--	--	✓	✓
Fare Products	Eliminate 7-Day Pass (adverse effect)	2.0%	2.0%	2.0%	2.0%	2.7%	--	--	n/a	n/a
	Eliminate 7-Day Pass (fare cap benefit)	0.7%	0.8%	0.7%	0.7%	1.0%	--	--	--	--
	Eliminate 14-Day Pass (adverse effect)	1.8%	2.3%	1.7%	2.0%	1.9%	--	--	n/a	n/a
	Eliminate 14-Day Pass (fare cap benefit)	1.0%	1.2%	0.9%	1.2%	0.9%	--	--	--	--

Technical Analysis – Data Tables by E-Fare Policy

The following tables summarize the rider survey data on fares that TriMet used to evaluate each e-fare policy option.

Elimination of Mail-Order Purchasing of Fare Media

Weekday Trips	Overall	M	non-M	LI	non-LI
# Buy Passes by Mail	119	25	78	31	67
Survey Total	4903	1203	3238	1636	2172
%	2.4%	2.1%	2.4%	1.9%	3.1%
Difference statistically significant at the 95% confidence level?		No		Yes	

Weekend Trips	Overall	M	non-M	LI	non-LI
# Buy Passes by Mail	58	15	33	19	20
Survey Total	3526	962	2215	1547	1163
%	1.6%	1.6%	1.5%	1.2%	1.7%
Difference statistically significant at the 95% confidence level?		No		No	

Automatic Reload Option for E-Card Using a Credit or Debit Card and New Fare Medium to Pay Fares Using a Contactless Smart Credit or Debit Card

These two policy options were analyzed using the same survey data on riders who have a credit/debit card available.

Weekday Trips	Overall	M	non-M	LI	non-LI
# Riders have credit/debit card	3839	838	2719	1213	2059
Survey Total	4981	1230	3329	1671	2274
%	77.1%	68.1%	81.7%	72.6%	90.5%
Difference statistically significant at the 95% confidence level?		Yes		Yes	

Weekend Trips	Overall	M	non-M	LI	non-LI
# Riders have credit/debit card	2595	642	1755	1111	1071
Survey Total	3550	973	2255	1558	1220
%	73.1%	66.0%	77.8%	71.3%	87.8%
Difference statistically significant at the 95% confidence level?		Yes		Yes	

Costs Related to E-Cards

\$3 one-time card fee for e-card, for initial card and replacement cards, and \$5 minimum load requirement (impacts on trips where fare product will eventually only be available by e-card)

Weekday Trips	Overall	M	non-M	LI	non-LI
# Use Tickets or Passes	2681	604	1840	889	1264
Survey Total	5073	1230	3347	1653	2274
%	52.8%	49.1%	55.0%	53.8%	55.6%
Difference statistically significant at the 95% confidence level?		Yes		No	

Weekend Trips	Overall	M	non-M	LI	non-LI
# Use Tickets or Passes	1811	448	1180	760	648
Survey Total	3615	982	2251	1553	1201
%	50.1%	45.6%	52.4%	48.9%	54.0%
Difference statistically significant at the 95% confidence level?		Yes		Yes	

\$5 minimum load requirement (impacts on trips where fare is less than \$5)

Weekday Trips	Overall	M	non-M	LI	non-LI
# Where Fare is Less than \$5	1241	337	756	506	417
Adult, Youth, HC Cash Fares	1184	318	726	480	403
Youth or HC Day Pass	57	19	30	26	14
Survey Total	5073	1230	3347	1653	2274
%	24.5%	27.4%	22.6%	30.6%	18.3%
Difference statistically significant at the 95% confidence level?		Yes		Yes	

Weekend Trips	Overall	M	non-M	LI	non-LI
# Where Fare is Less than \$5	1343	377	816	621	393
Adult, Youth, HC cash fares	1267	362	765	592	376
Youth or HC day pass	75	15	51	29	17
Survey Total	3614	981	2251	1553	1201
%	37.2%	38.4%	36.2%	40.0%	32.7%
Difference statistically significant at the 95% confidence level?		No		Yes	

HC = Honored Citizen

New Fare Caps Available with E-Fare

Weekday Trips	Overall	M	non-M	LI	non-LI
# Paid by Cash where Rider Travels Frequently Enough to Benefit from Fare Caps	193	53	119	97	57
Adult, > 40 trips/month	107	25	70	55	34
Honored Citizen, > 26 trips/month	43	9	30	28	12
Youth, > 22.4 trips/month	44	19	19	15	11
Survey Total	4503	1051	3099	1481	2147
%	4.3%	5.0%	3.8%	6.6%	2.6%
Difference statistically significant at the 95% confidence level?		No		Yes	

Weekend Trips	Overall	M	non-M	LI	non-LI
# Paid by Cash where Rider Travels Frequently Enough to Benefit from Fare Caps	227	73	136	134	49
Adult, > 40 trips/month	144	41	92	87	37
Honored Citizen, > 26 trips/month	40	10	26	28	8
Youth, > 22.4 trips/month	43	23	18	19	5
Survey Total	3061	812	1996	1342	1104
%	7.4%	9.0%	6.8%	10.0%	4.5%
Difference statistically significant at the 95% confidence level?		Yes		Yes	

Elimination of 7-Day Pass

Adverse effects of eliminating 7-Day Pass

Weekday Trips	Overall	M	non-M	LI	non-LI
# Paid by 7-Day Pass	64	22	37	21	29
Survey Total	5073	1230	3347	1653	2274
%	1.3%	1.8%	1.1%	1.3%	1.3%
Difference statistically significant at the 95% confidence level?		No		No	

Weekend Trips	Overall	M	non-M	LI	non-LI
# Paid by 7-Day Pass	73	20	45	31	33
Survey Total	3615	982	2251	1553	1201
%	2.0%	2.0%	2.0%	2.0%	2.7%
Difference statistically significant at the 95% confidence level?		No		No	

Benefits of fare caps for riders that travel frequently

Weekday Trips	Overall	M	non-M	LI	non-LI
# Paid by 7-Day Pass where Rider Travels Frequently Enough to Benefit from Fare Caps	24	11	13	11	8
Adult, > 40 trips/month	21	9	12	10	7
Honored Citizen, > 26 trips/month	3	2	1	1	1
Youth, > 22.4 trips/month	0	0	0	0	0
Survey Total	5073	1230	3347	1653	2274
%	0.5%	0.9%	0.4%	0.7%	0.3%
Difference statistically significant at the 95% confidence level?		Yes		No	

Weekend Trips	Overall	M	non-M	LI	non-LI
# Paid by 7-Day Pass where Rider Travels Frequently Enough to Benefit from Fare Caps	27	8	16	11	12
Adult, > 40 trips/month	24	8	14	10	11
Honored Citizen, > 26 trips/month	1	0	1	1	1
Youth, > 22.4 trips/month	1	0	1	0	1
Survey Total	3615	982	2251	1553	1201
%	0.7%	0.8%	0.7%	0.7%	1.0%
Difference statistically significant at the 95% confidence level?		No		No	

Elimination of 14-Day Pass

Adverse effects of eliminating 14-Day Pass

Weekday Trips	Overall	M	non-M	LI	non-LI
# Paid by 14-Day Pass	68	19	37	23	27
Survey Total	5073	1230	3347	1653	2274
%	1.3%	1.5%	1.1%	1.4%	1.2%
Difference statistically significant at the 95% confidence level?		No		No	

Weekend Trips	Overall	M	non-M	LI	non-LI
# Paid by 14-Day Pass	64	22	38	31	22
Survey Total	3615	982	2251	1553	1201
%	1.8%	2.3%	1.7%	2.0%	1.9%
Difference statistically significant at the 95% confidence level?		No		No	

Benefits of fare caps for riders that travel frequently

Weekday Trips	Overall	M	non-M	LI	non-LI
# Paid by 14-Day Pass where Rider Travels Frequently Enough to Benefit from Fare Caps	34	9	20	13	16
Adult, > 40 trips/month	27	7	16	10	13
Honored Citizen, > 26 trips/month	6	1	4	1	2
Youth, > 22.4 trips/month	1	1	0	1	0
Survey Total	5073	1230	3347	1653	2274
%	0.7%	0.7%	0.6%	0.8%	0.7%
Difference statistically significant at the 95% confidence level?		No		No	

Weekend Trips	Overall	M	non-M	LI	non-LI
# Paid by 14-Day Pass where Rider Travels Frequently Enough to Benefit from Fare Caps	35	12	21	19	11
Adult, > 40 trips/month	30	10	18	17	9
Honored Citizen, > 26 trips/month	5	2	3	2	2
Youth, > 22.4 trips/month	0	0	0	0	0
Survey Total	3615	982	2251	1553	1201
%	1.0%	1.2%	0.9%	1.2%	0.9%
Difference statistically significant at the 95% confidence level?		No		No	

Appendix C

Moderator Guide for CBO Constituent Meetings

TriMet Hop FastPass Electronic Fare System
Moderator Guide for Constituent Meetings
with Community Based Organizations (CBOs)
November 6, 2015

Introduction (CBO Staff)

- TriMet is building a new electronic fare system, called the Hop Fastpass.
- The new fare system will include some changes from the current fare system. The purposes of today's meeting are for you to learn more about the new Hop fare system, and to provide your input on how you think you, or your family and friends, might use the Hop system, what you think are possible benefits, and if there are any potential downsides or improvements that TriMet might want to take into consideration.
- TriMet's Board will be voting on whether to adopt some basic features of the Hop system early next year, so your input today is important to help inform the Board's decisions.
- First, TriMet staff will introduce you to how the Hop system will work.
- Then we will have a group discussion on how you think the Hop system will affect you.

Hop 101 (TriMet Staff)

- Why is TriMet investing in the Hop Fastpass?
 - *TriMet is migrating to a regional electronic fare system, called the Hop Fastpass, which is being jointly developed with Portland Streetcar and C-TRAN.*
 - *The goal of Hop is to make it faster, easier, more secure, and more convenient for riders to take the bus or train. This state-of-the-art system will also allow TriMet to offer new benefits to customers, such as fare capping and loss protection, and collect fares more efficiently.*
- What will be different from how riding TriMet is today?
 - *For folks who currently use cash and get a paper transfer or 1-day pass when they board the bus, and want to continue using cash, the system will be the same. They can continue doing what they have always done.*
 - *Starting in 2017, those who want to will be able to use the Hop card to pay their fare when they ride on TriMet, C-TRAN, or Portland Streetcar. Or, you can still pay by cash onboard the buses and at the ticket machines at MAX and WES stations.*

-
- *The new system will allow riders to quickly pay their fare by tapping a reloadable Hop card, their smartphone, or their personal credit/debit card. Paper pass products (i.e. 7-day, 14-day, and Monthly/30-day passes) will be phased out, after a transition period. If riders get a Hop card, their fares will automatically be upgraded to a day pass or monthly pass depending on how frequently they ride.*
 - *It's like getting the benefit of a Day Pass, but you can pay \$2.50 at a time instead of the \$5.00 for the pass upfront (or \$1.25 at a time for Honored Citizen/Youth instead of \$2.50 for the pass).*
 - *You'll also get the benefit of a Monthly Pass with the Hop card. You can pay for one trip at a time, instead of \$100 (for Adults, \$28 for Youth and Honored Citizens) for the pass upfront. Once you have paid \$100 (or \$28) in a calendar month, the rest of the trips you take that month are free. The Hop card will do this automatically.*
 - *Riders will still have the option of purchasing a 2.5-hr ticket and 1-day pass using cash onboard buses and at the ticket machines at MAX and WES stations.*
 - *Ticket machines will issue "e-tickets", which are disposable paper tickets with an electronic chip that act the same as the current paper tickets, but enable riders to "tap on" at Hop Fastpass readers on station platforms.*
 - **How will the Hop Fastpass system work?**
 - *The Hop card is similar to a gift card, and will be available at more than 500 retail outlets across the region. Value can be loaded onto the Hop card at grocery stores, convenience stores and pharmacies, by phone, via mobile app, at TriMet's Pioneer Square ticket office, and online at TriMet's website.*
 - *You will be able to load value onto the Hop card using cash at retailers or your credit/debit/bank card at retailers, online, by mobile app, or by phone.*
 - *Lost-card protection – If you register your Hop card, your stored value will be saved in your account even if you lose your card.*
 - *Riders will be able to go online or use the mobile app to manage their account, view their Hop card account history, or set up automatic reloads when the stored value amount gets low.*
 - **What will it cost riders?**
 - *Fares for riding TriMet will be the same with the Hop card as they are with cash, but with the Hop card riders will pay no more than \$5 per day and \$100 per month (or \$2.50 and \$28 for Honored Citizens and Youth).*

-
- *The Hop card itself will cost a one-time fee of \$3, for a new or replacement card. In order to provide automatic price caps, the Hop system requires that each rider has his or her own card.*
 - *There will be a \$5 minimum requirement every time you load value onto the Hop card. This is not a fee, just a minimum transaction amount (the same as the current TriMet ticketing app has).*
 - How is TriMet trying to address equity issues surrounding the Hop Fastpass?
 - *The Hop card will have daily and monthly price caps. This means you will pay no more than \$5 in one day (or \$2.50 for Honored Citizens and Youth) and no more than \$100 in one calendar month (or \$28 for Honored Citizens and Youth). With the Hop card, you will receive the benefits of a daily or monthly pass without having to pay the cost of the pass upfront. Today, only those who have \$100 (or \$28) at the beginning of the month get the unlimited ride benefit of a monthly pass.*
 - *Even after Hop is in place, you can still use cash to purchase 2.5-hr tickets and 1-day passes onboard the buses and at the ticket machines at MAX and WES stations.*
 - *TriMet will distribute thousands of free Hop cards for a temporary period after launching.*
 - *A transition period after launch will allow users time to learn about how Hop works.*
 - *We're looking for other ideas from community members including you.*
 - Any questions about Hop?

Purpose of Group Discussion (TriMet and CBO)

TriMet Staff:

- TriMet wants to hear from community organizations and riders about how you or your family and friends might use the Hop system, what you think are possible benefits of the system, and if there are any potential downsides or improvements that TriMet might want to take into consideration.
- In addition, whenever we make a change like this one to the fare system, one of the requirements from the federal government is to examine the potential impacts on communities of color and low-income populations.
- We want to make sure that communities of color and low-income populations are able to enjoy the benefits of Hop as much as possible. We also want to identify and try to address any potential negative impacts before the new system is put in place.

-
- As background, TriMet has used data from a recent rider survey to look at the potential impacts of changes proposed in Hop on communities of color and low-income populations. This analysis found that some of the proposed policies, to eliminate transfers and 1-day passes for riders that pay with cash, would have unfair negative impacts on low-income riders.
 - We heard similar input from community organizations and our Transit Equity Advisory Committee, and decided not to move forward with these policies.
 - So, as a result, those who use cash and receive a paper transfer or 1-day pass when boarding the bus, will continue to have these options.

CBO Staff:

- Your input today will help inform the TriMet Board’s discussions around the final policies and changes for the new Hop system. If there are any potential concerns regarding impacts on communities of color and low-income populations, TriMet’s Board wants to take those into consideration as it makes its decisions.
- Some Hop features have already been decided, such as the Hop card having stored value, the daily and monthly price caps on the Hop card, and eliminating current pass products due to the new price caps offered on Hop.
- Some Hop features are still being finalized, such as the places where you can buy and add value to the Hop card and the required minimum load on the Hop card at certain locations. Your input today is important for TriMet’s staff and the Board of Directors to hear, before final decisions are made on the Hop system.

Possible Discussion Questions (CBO Staff)

- We’ve discussed a few of the potential benefits of the Hop card – I’d like to get your feedback on those first.
 - Price capping – Is everybody clear on how that would work, are there any questions? What do you think about this feature? Do you think you would be able to take advantage of that feature?
 - Loss protection – This feature would be available if you registered your card online. That way the system can link the card back to you and know you are the owner. What do you think about this feature? Do you think you would register online to activate this feature?
 - Faster boarding/not needing exact change – One potential advantage of the Hop system is that it should make getting on the bus quicker. If riders do not have to find exact change (or wait for others to do so), the boarding process can speed up, resulting in a

more reliable bus system. What do you think of this feature? If you use cash today, do you think you would switch to the Hop system to take advantage of this feature?

- Added retail outlets – The Hop card will be available at 540 more retail outlets than currently sell TriMet tickets. The retail outlets will be more geographically dispersed throughout the region than current ticket outlets. What do you think of this change? Will having more retail outlets encourage you to use the Hop system?
 - The minimum load is set at \$5 because it's a requirement in TriMet's contract with the retail vendor. This contract increases the retail network by over 500 stores including 7-Eleven, Dollar Tree, Jacksons, RadioShack, Rite Aid, Walgreens, and Wal-Mart. TriMet is also working to add Plaid Pantry to this network.
 - TriMet has options to identify additional retailers for the contract, and set up retailers/partners on their own. What venues could be added to improve access to Hop?
- Initial free card/\$3 fee for replacement – What are your thoughts about the cost of a Hop card? Would a one-time \$3 fee or replacement fee present a significant barrier to your using the card? If TriMet distributes free cards initially, does that help address this concern?
- \$5 minimum load – To keep the costs of the Hop system low and maximize the number of retail outlets, the minimum reload will be \$5. Again, this is not a fee, just the minimum amount of a reload – the equivalent of an adult day pass. Does this present a significant barrier to using the Hop card? If the cash system is still available, does this address the issue since riders who pay by cash will be able to ride as they do today?
- Given the details of the system, do you see yourself using Hop?
 - If so, why?
 - If not, what are the major barriers?
- If you would use Hop, do you think you would get a Hop card, use your smartphone (e.g., Apple or Android Pay), or use your contactless credit/debit card to pay fares?
 - Hop card: Costs \$3 (one-time fee for the card itself) and has \$5 minimum load requirement when you add value. Benefits of daily and monthly caps, lost value protection, and automatic reload if you add value through the Hop app or TriMet's website.
 - Use your smartphone:
 - First option is to use the Hop app. You pay the costs for a Hop card (\$3 one-time fee and \$5 minimum load). Then you load your Hop card onto the app, and can

manage your account through the app. You need to have a credit/debit card to load value through the app. Benefits of daily and monthly caps, lost value protection, and automatic reload.

- Second option is to use Apple/Android Pay. No costs to use this, but you need to have a credit/debit card. Benefit of daily cap, but not monthly cap.
- Use your smart, contactless credit/debit card: No costs to use this. Benefit of daily cap, but not monthly cap.
- If you would get the Hop card:
 - What would be the most convenient way(s) for you to buy a Hop card and add value? Visit a retail outlet, by phone, via mobile app, visit TriMet's Pioneer Square ticket office, or online at TriMet's website?
 - What grocery stores, convenience stores, and pharmacies do you regularly visit, in what neighborhoods or areas?
 - Will the proposed retail network be convenient for you? [*Reference map of the proposed retail network.*]
 - Are there gaps in the retail network, particularly in areas where many minority and low-income populations live?
 - How would you load value on the Hop card? Pay cash at a participating retailer? Or use your credit/debit card, either at a retailer or online/by calling customer service/through the mobile app?
 - When you ride TriMet, do you ride with children over age 6? Would it be worth it to you to purchase a Hop card for them so they can have daily and monthly price caps?
- Other discussion questions?

Conclusion (CBO Staff)

- Thank you very much for your participation today.
- In terms of next steps, we will document your input today and work with TriMet staff to develop a report to the TriMet Board in early January.
- The TriMet Board will hold two meetings about the Hop fare system, called ordinance readings, in January and February 2016. In these meetings, the Board will finalize the basic features and policies of the new Hop system, but TriMet will be looking for ongoing feedback as to how the system works for riders once it is in place.

Appendix D

CBO Summary Reports

- Asian Pacific American Network of Oregon (APANO)
- Black Parent Initiative (BPI)
- Center for Intercultural Organizing (CIO)
- Gladstone High School
- Latino Network
- Native American Youth and Family Center (NAYA)



Dec 1, 2015

Jill Chen Stober
Senior Transportation Planner
KFH Group, Inc.
4920 Elm Street
Suite 350
Bethesda, MD 20814

RE: APANO eFares Discussion Group

Dear Ms. Stober,

This report summarizes APANO's discussion group for the proposed eFares system held on Thursday, November 12 at the APANO offices located at 2788 SE 82nd Ave suite 203, Portland OR 97266. This discussion group brought together 5 Asian Pacific Islander identifying participants who also identified as transit dependent to discuss eFares. The discussion group was additionally supported by staff from Trimet and KFH Group. This report was also supplemented by two additional one-on-one conversations with community members who couldn't make the event.

In summary, our participants were cautiously optimistic about the eFares proposal and felt the benefits (daily/monthly caps, potential for future low-income fare) outweighed the burdens. The key direct concern people did raise pertained primarily to access issues for families with children. Overall, our participants stated that it was primarily the cost of fares in general that was the main obstacle for low income transit riders. We understand TriMet believes the daily and monthly caps, giving away thousands of cards, and allowing riders to still use cash are sufficient as the primary equity mitigations. However, our participants really spoke to the need for policies particularly addressing the challenges for the neediest riders in the future.

We appreciated Trimet's short presentation on Title VI equity analysis and whether there are disproportionate impacts on low-income people or communities of color. This helped us think about potential mitigation strategies, some of which are suggested below.

Below are some selected direct quotations of our participants and their primary concerns.

Racial Profiling:

"I can see it being a problem. We already have racial profiling in fare enforcement. When the cops approach a large group of youth, I can just see it being very difficult. It's just seems worse with an electronic card, checking to see if you paid to get on here. I can just see if person was caught lying to officer, I can see it escalating."

Electronic vs Human Error Concerns

"What if there was a mistake. People vs. machine error and what's more trustworthy." We want to make sure there is a mechanism in place so people can contest system mistakes. Will there someone who can take an explanation or complaints in place?

Fare Capping

Participants like that this benefits people who don't have \$100 at one time.

"Can carry over what you don't use each month and loading value in smaller increments is generally good"

What about families with kids?

“Kids will lose cards, hard to manage for families, why not allow multiple people to use the same card?”

We were told this was an either/or situation. Card can come with daily/monthly cap or cards where you can have multiple users with no caps. Generally, people favored having the cap, but why not give people the option to choose what kind of card they want: Family Cards (with no caps) or Individual Cards (with caps). TriMet staff thought that was an interesting idea.

Why do the cards themselves cost money?

Besides giving cards away for free at first, how can low income riders have better access to cards in the future?

Question about student cards:

We understand it'd be a special PSU Hop card, but is this available to high school youth or students at other colleges and universities?

General location concerns and why aren't the cards sold at train stations?

Two great suggestions arose:

- 1) Maybe they could be at the stations where there is less retail coverage, especially for places East of 82nd.
- 2) “Should sell cards at Title I schools, or juvenile detention centers, anywhere people could use support. Direct service, domestic violence, social service agencies, DHS, etc.”

Decision making process concerns

“Who is making these decisions at Trimet and who are they accountable to. The board doesn't reflect people who ride. I get the sense that TriMet doesn't care about poor people” and “seems like most of the big decisions have already been made.”

Transit costs in general

“Fare is so expensive. If you make minimum wage, transit takes 10% of your income. That is too expensive.” A great mitigation would be looking into creation of a low income fare program.

Question about card Reader placement

“Can you swipe on the train, because I can envision difficulties with it on the platform. Why not put readers on train as well?”

Questions about lost cards and how to get replacements.

How can this be easiest for users that do not understand English.

What's captured in registration process?

If they want to register the card, people will need an email address, but not everyone has an email address. What else can be done to allow users to register the card, especially for non English users and those without emails.

Language Access

TriMet says customer service has access to 120 languages, but how does that work in reality. How long is the delay on the phone and will people actually want to use it. What can be done to ensure non English speaking users have the best possible way of meaningfully engage with Trimet?

In summary, participants felt the discussion was rich and allowed for their concerns about Trimet to be heard in general. They appreciated the chance to participate and weigh in on new Trimet proposals. They would really like to encourage Trimet to consider options to take care of low income riders in the future. Unsurprisingly, though this conversation was focused on eFares, it allowed an avenue for transit riders in our community to voice other concerns such as racial profiling.



Facilitator: Khanh Pham, APANO Environmental Justice Manager

Black Parent Initiative eFare Group Discussion

Meeting Date and Time: Nov. 13, 2015, 10:00 am

Meeting Location: BPI Office, 2915 NE Martin Luther King Blvd, Portland, OR 97212

Staff Contact: Kimberly Porter, Home Visiting Manager

There were four African-American female, teen parent participants at the group. All were between the ages 18-19 and currently receiving state public assistance in the form of TANF (cash benefits) and SNAP (food stamps). There was also four BPI staff, all whom identify as African-American. Three females and one male. Two were Native Oregonians, one from the Midwest (Ohio & Michigan) and the other from Boston, Mass. All identified as middle class with sporadic use of TriMet.

The discussion was heavily centered on how our teen parents feel they are treated differently when traveling on TriMet, either the bus or the Max. There was a major theme with our teens that they face discrimination due to being African-American and teenager. They stated that many of them don't have an ID and are frequently questioned about getting a student pass when they do not have any form of ID indicating they are students. They report more scrutiny by TriMet employees when they are traveling with their kids as they are seen as adults. They report frequently being asked to show their ID's. Many lack high school ID's so when they don't have one and are stopped and questioned that are given a ticket, which they are unable to pay which leads to other sanctions such as warrants and other charges.

Suggestions - All participants were in favor of the eFare card. They also recommended having a key chain to carry their card as well as having an app on their phone where they could reload the card. They also suggested that since many of them don't have a high school ID that TriMet identify locations and process for them to get ID's through TriMet that would complement their eFare card. This would also be helpful for our African immigrant population to avoid unnecessary ticketing.



TriMet Hop Electronic Fare System Community Discussions

The Center for Intercultural Organizing (CIO) conducted two community meetings to get feedback about the TriMet Hop FastPass Electronic Fare System at its Beaverton location. Most of the community members who attended are residents of Washington County, low income, and of immigrant and refugee background. Most notably, many of the participants were refugees who have been in the U.S. for less than five years. This is an important perspective, as they represent some of our region's most underserved communities, and have limited capacity in systems navigation and diverse language needs.

Meeting date and time: Thursday, December 3, 2015; 6:00 – 8:00 PM

Location: Center for Intercultural Organizing Beaverton Office (12625 SW Broadway St. Suite 200, Beaverton, OR 97005)

Number of attendees: 40

Participant demographics:

- Arabic: 21 (5 limited English speakers – Arabic speaking)
- Latino: 13 (6 limited English speakers – Spanish speaking)
- African: 3
- Caucasian: 3

Meeting date and time: Saturday, December 5, 2015; 1:00 – 3:00 PM

Location: Center for Intercultural Organizing Beaverton Office (12625 SW Broadway St. Suite 200, Beaverton, OR 97005)

Number of attendees: 48

Participant demographics:

- Arabic: 16 (1 limited English speaker – Arabic speaking)
- Latino: 9 (3 limited English speakers – Spanish speaking)
- African: 4 (2 limited English – Somali speaking)
- Bhutanese: 16 (16 limited English speakers – Nepali speaking)
- API: 1
- Caucasian: 2

Discussion Points and Take-Aways

Price Capping

Most people welcome the idea of the Hop Card. Community members like the \$5/day and \$100/month cap because it saves money for those who usually spend more on daily travels, and allows credits to roll

over to the next month if folks do not use all \$100. People understood the concept of price capping generally, but they did have a lot of questions. CIO recommends that TriMet establish a thorough outreach plan in order to communicate the benefit to community members, keeping in mind language and cultural barriers.

Card Registration

While community members thought that the loss protection provided by the Hop Card was a good thing, many people will face barriers with registering their cards and will not be able to access that benefit. Only about 30-50% of participants reported that they would register the card. Most reported not having access to internet and not being computer literate. Language barriers also pose limitations to people's abilities to access registration. Many community members liked the idea of being able to register their card over the phone, especially with multilingual language services. However, requiring an email address is still a barrier.

CIO recommends that TriMet provide riders with the option to use their cell phones to register their respective Hop Cards, so they can receive receipts through SMS messaging if email is not available. Over-the-phone registration is a good option for many immigrant and refugee community members, and multi-lingual posters should be used in outreach to make sure the community knows that phone registration is an option. We clearly saw through participants' answers that seniors will be the most negatively impacted by requiring an email address for Hop Card registration, and our most underserved community members will not receive the benefit.

Retail Stores

People generally felt that they would be able to access retail store locations that were listed to buy the Hop Card and refill fare. However, because there were so many participants, we were not able to review the map. With most of the participants from Washington County, there is concern about the distance of stores from where people live and ride the bus. CIO knows through past engagement work—like the Aloha-Reedville Study—that areas like 185th Ave. and Cornell Pass Rd. have unsafe and difficult walking conditions and getting to retail locations could present a significant challenge. We also heard from community members that carrying Hop Cards in ethnically specific stores would help with access. CIO recommends that TriMet actively reach out to ethnically specific small businesses so they know they can offer the Hop Card. We also recommend providing these stores with outreach materials that will inform the community about changes at TriMet.

Card cost and minimum load

People were generally alright with the \$3 cost of the card and \$5 minimum to load the card. However, some folks did express a concern for \$3 cost. People particularly seemed concerned about having to buy a card for each member of the family. If no one in the family has a card, they will need to spend \$8 per person to get a Hop card with the minimum balance, and that can be challenging for our communities. We urge TriMet to continue to think about how a family card might be possible, even if it is just for children. Community members also expressed their desire for a low income fare.

Providing free cards will help with the \$3 cost. We hope that TriMet reaches out to many social service agencies, but also community-based organizations, schools, and places of worship in order to distribute free cards to the community members that most need them.

Community Outreach

For our newcomer communities, it is critical that they receive information about the changes to the TriMet system. Translation into multiple languages is key. We suggest working with refugee resettlement agencies and county health clinics to understand community language needs. One community member suggested that TriMet should have paintings and visuals to represent the new change and the process, which would help all community members to understand changes regardless of language and ability. These instructional images should be posted all over buses and transit stops. Like with the free cards, we suggest TriMet connect with social service agencies, community-based organizations, schools, and places of worship to distribute information about the changes. We also suggest reaching out to diverse communities to participate in the 2016 trial period, so TriMet can thoroughly analyze different problems that might arise for different communities.

Usage and Payment methods

We reviewed the various options and asked participants if they believed they would use the Hop Card, smart phone apps, contactless credit, or cash once the Hop FastPass system is up and running. Participants' answers varied, but it broke down to about one third reporting that they will buy the Hop Card, one third continuing to use cash, and one third using either smart phone apps or a contactless credit card. Also, it was clear that older folks from immigrant and refugee backgrounds were more likely to use cash, because it is what they are most familiar with and they do not use cards or the internet. One community member who works with people who have developmental disabilities with limited English emphasized the importance of combining the Honored Citizen picture ID with the Hop Pass to make it easier for community members.

Of those who will use the hop pass, about 50% reported they would use online methods to refill their card balance, and about 50% reported that they would go to a store. Most folks did not report a concern for how close the stores are to where they live; however, one person who lives in Tualatin expressed concern that the store might be too far for her. As stated before, we do have some concern for the closeness of retail for Washington County residents. We believe that keeping the cash option is very important for our immigrant and refugee elders because of accessibility issues.

Gladstone High School E-Fare Group Discussion

Meeting Date and Time: Nov. 12, 2015, 3:00 pm

Meeting Location: Gladstone High School, 18800 Portland Ave., Gladstone, OR 97027

Staff Contact: Natalie Osburn, Principal

Facilitator: Julia Metz, Business Services Project Manager, Clackamas Workforce Partnership

Four high school students participated in the group discussion. All use TriMet services regularly with a monthly pass, and one student was a minority. All participants indicated they would use the e-fare system. The benefits of fare caps, loss value protection, greater convenience, and faster boarding were attractive to participants. The main concerns included the security of personal information in the e-fare account, having options if they don't have or can't use their smartphone, and the \$5 minimum load. The discussion points are summarized by e-fare topic below.

Fare Caps

- Participants really liked the benefit of fare caps.

Stored Value

- Participants liked the idea that a rider won't pay more than they actually ride, since the stored value on the e-card will roll over to the next month (as opposed to paying for a monthly pass now, and the value is lost if you don't ride frequently enough to justify the cost of the pass).

Faster Boarding

- Participants liked the benefit of faster boarding.

Eliminating Paper Fare Products

- Participants were concerned about people including elders who don't access technology, and wanted to make sure they could still get the benefit of loss value protection. They thought the ability to call customer service regarding the e-card was a good option.
- Participants saw the durability of the e-card as a benefit (as opposed to the current paper student pass, which can go through the wash).

E-Card Costs

- Participants thought the \$3 card cost was reasonable to encourage people not to lose their cards.
- Participants indicated that the \$5 minimum load was reasonable for them, but were concerned about others for whom \$5 would be a hardship.

E-Card Registration/Loss Value Protection

- Participants would register the e-card online, but they were concerned about the system's security regarding their personal information including the credit card information on their e-fare account.
 - TriMet staff explained that the system will be set up so there is no link between personal credit card information and the e-card.
- The e-fare system is a lot better than the current paper fare products in situations where a rider loses their pass.

Retail Outlets

- Adding more retail outlets will help riders use the e-fare system.
- Suggested retail locations included convenience stores (e.g., Vista) and coffee shops (e.g., Starbucks, Black Rocks).

Obtaining an E-Card

- Participants would like to be able to purchase an e-card online and receive it through the mail.
- Suggested the ability to load value onto the e-card at ticket vending machines.
- Suggested selling e-cards through automated retail kiosks similar to Redbox, which could be placed at major bus stops (would need to ensure secure payments for credit cards).
- Participants liked the distribution of free e-cards during the initial period.
 - They suggested having \$5 pre-loaded on the free cards.
 - They also suggested distributing the free cards at retail outlets and onboard vehicles.

Adding Value to E-Card/Managing Account

- Some participants cited a preference to add value by cash (nervous to use credit cards), while others indicated they would probably use a credit card.
- Participants preferred to add value online or at a convenience store.
- It is helpful to have options for loading value onto the e-card, as riders may not be able to get to retail stores on certain days.
- Participants indicated they would use the e-fare mobile app to manage their account, but probably not to load value.
 - A concern identified about using the e-fare mobile app was the need to watch the data limit on their smartphones.
- Suggested that the e-fare mobile app sends notifications, with a preference for texts rather than email, when the account balance is low and when the rider has reached milestones (e.g., when you have taken enough trips during the month to reach the fare cap).

Education and Outreach on E-Fare

- Suggested bus drivers help promote the changes coming with e-fare, displaying information onboard buses, putting ads on TV (e.g., morning news shows) and online (e.g., Pandora ads), and making announcements through community groups and schools.
- Address FAQs such as what happens if the e-fare system malfunctions, what to do if the chip in the e-card is damaged, what to do if you lose your e-card, what information is required to set up an e-fare account, and how to find out the balance on your e-card.
- Clarify that the e-fare mobile app is for account management only, and riders cannot show the app to the bus driver to pay – they must use the e-card.

Other Concerns

- Riders sometimes forget their phones or run out of battery – need other options to pay fares and load value onto e-card.
- Risk of vandalism at e-fare machines/scanning systems or at e-fare vending machines, if implemented.
- TriMet should try to identify and address problems that have arisen for other systems that have electronic fare systems.



LatinoNetwork

www.LatNet.org

410 NE 18th Ave
Portland, OR 97232

info@LatNet.org
503.283.6881

Constituent meetings for the TriMet Hop Fast Pass Electronic Fare Latino Community Focus Group

November 23, 2015 at 6-8 pm

Hosted by Latino Network

Facilitated by Linda Castillo and Antonio Ramirez

Number of Latino community participants: 15

KFH Group staff: 1

TriMet Staff: 3

This session was provided in Spanish, as a majority of the participants were monolingual Spanish speakers. Headsets were provided for translation, as needed.

After introduction and orientation to the focus and form of the evening's discussion, Martin Gonzales of TriMet, provided the group an orientation to the Hop Fastpass system and future changes the community is likely to see. In addition, he provided some background as to how this plan will be reviewed by community, be reviewed by staff, and its eventual path to approval by the TriMet Board. E-fare is scheduled to take effect 2017.

After a Hop Fastpass 101 review as to why the change is occurring and how the system is expected to work, the group heard more on how the new system will be different than the current one. Incorporated in the discussion was how TriMet plans to address equity issues surrounding the Hop Fastpass.

The group was asked to imagine themselves using the Hop Card and if they foresaw any barriers in its use:

Some foreseen, potential barriers were:

- 1) Money might not be transferable from the Hop Fastpass
- 2) There may be challenging or difficult to access purchase venues/sites.
- 3) A physical card is necessary.
- 4) Information on use and user might be shared and **fear confidentiality compromised. Some people concerned that their immigration status might be compromised.**
- 5) Information might be given to the police, unnecessarily.
- 6) Multiple cards may be difficult for a family to navigate. The participants forwarded the concept of a **Family Card** as this might make travel easier for parents traveling with several children.
 - a. Cost of card per person \$3 plus \$5 = \$8 per family member. Concern's this might be a price barrier for some.
 - b. Participants asked if might be family discounts to ease potential price burdens and/or the creation of a 'family card'?
- 7) What if someone doesn't have ID? How can they purchase a card?

- 8) Rider using another ID if info doesn't match registration, might police be involved?
- 9) Those who do not have computer access or are not computer savvy (elderly, esp.) may have greater challenges registering the card. It was suggested that these folks could go to a TriMet office and be assisted. It would be helpful to formalize this mechanism to assist folks.
- 10) We need **more security at transit stop** waiting areas. There are still intoxicated, inappropriate, & belligerent people who congregate there. Would like to somehow to remove them from the transit stops.
- 11) **There is no rollover of unused funds.**

Thereafter, the group discussed potential benefits of the card and provided this feedback on these themes:

Security:

- 1) Protection against 'bad apples', and use of a photo id from TriMet is a good idea.
- 2) Feel safer because of better control over who rides using e-fare card.
- 3) Advantages to card especially if it is registered.
- 4) If I have registered and I lose my card, my investment/transit fund bank is protected.
- 5) Someone without an ID can still purchase a card.

Price Capping:

- 1) Don't have to preload to \$100. Pay what you need at each ride.
- 2) Get charged only when you ride, \$5.00 max per day.
- 3) Save money at the end of the year!
- 4) **Cost savings on multiple trips!**
- 5) Don't get our hands dirty handling cash to make purchase on the go or at machines.
- 6) Cap starts anew every month.

Loss Protection:

- 1) No costs to protect card other than having to register it in advance.
- 2) TriMet explained that the \$3 cost of the card is for the chip and registration services.
- 3) If card is lost or stolen, it can be replaced and funds on card are recuperated.
- 4) **Ability to register card is a great idea.**
- 5) TriMet does not verify or check whether the info you enter.

Faster boarding/no exact change needed:

- 1) Convenient idea as one always doesn't have the necessary change. Can avoid 'bad passes' that are sold on the street.
- 2) One card for all modes of transit; bus, light rail, streetcar, C-Trans.
- 3) **Easy, early boarding with a 'tap' of the card.**
- 4) Ease of use is welcome.
- 5) Can pay with cash, credit/debit card.

Additional retail outlets/Where to get HOP card:

- 1) The group requested an additional retail site at Tienda Doña Maria's grocery store at 6736 NE Killingsworth Avenue at Villa de Clara Vista.
- 2) Additional stores recommended are Plaid Pantry, Dollar Tree, Jackson's, Walmart, Winco and 7-11.

Initial free card/\$3:00 replacement +\$5 minimum load:

How would you use/load Hop card:

- 1) Can a phone app be used to load and at some point use instead of a card. Per TriMet for now, a rider can access Hop card balance and can manage use on their Smart phone. In the future, TriMet will look into using the phone instead of the card for boarding. They will be consulting with Google and Apple on this.

Other benefits:

- 1) Accidentally drop the card in the laundry, it will still be ok!

Other discussion items:

TriMet clarified they do not sell rider information. But if they receive a police subpoena, they will have to legally comply. Otherwise, info will only be available to TriMet customer service to assist rider with their trips and purchases on the e-card. Only info requested will be name, address, email, DOB, telephone, and for the user to create a pin#.

A fare inspector can view card and know when it was last tapped.

Could texting be used as a substitute for email? Not everyone has an email account or is linked to the Internet. TriMet stated it would investigate this option.

Folks were curious what info would show up to driver or upon boarding:

TriMet stated this info would be revealed (whether an adult, youth or honored citizen card, time left on card, time remaining for transfer. Card can be declined if not enough fare on the card. Low balance amount is shown to customer only so that s/he can reload, as needed.

The topic of how much information is collected was an elevated topic for this group. TriMet shared that they will have a history of ridership per month and this history will be collected electronically. At this time it does not note the difference in the use by youth, adult or honored citizen.

Overall, the participants were excited and welcoming of this new concept, rider's technology, and looking forward to using it.



Native American Youth and Family Center

5135 NE Columbia Blvd., Portland OR 97218 | p 503-288-8177 | f 503-288-1260 | www.nayapdx.org

11.30.15 HopPass Native American Community Discussion NAYA Family Center for KFH Group and TriMet

On November 30, 2015, the Native American Youth & Family Center hosted a discussion group with 13 self-identified Native American TriMet transit riders to learn about and respond to TriMet's new HopPass system. About half of the participants were low income. TriMet staff gave an overview of the new program and answered questions on a variety of topics. Community members were grateful for the opportunity to talk with TriMet staff about equity considerations. Hopefully this conversation will be followed up with meaningful action. Community members were excited by the fact that this new system would make it easier to implement a low-income fare because people could have a link to an account that would establish this status.

One of the most challenging points of contention involved the up front costs. Several participants indicated that the \$3 fee would be burdensome. While they appreciate the initial waiver of the fee, there were concerns and questions associated with what happens when this time period is over and whether it can be extended. For example, one question involved whether or not any value on the card account could be used to pay the \$3 fee if the card gets lost. Another individual asked if it was possible to have a one-time "freebie" card for those that initially got a free card, but may have lost it.

The \$5 minimum load value would be a burden as well. There were questions about whether or not a family deal could happen, and whether value could be transferred from one card to another within the same account. Someone suggested the idea of having multiple chips on one card, i.e. "Rider 1", "Rider 2", etc. The distance between chips would be a very real consideration, so other options would include smaller key ring cards, or at least a ring provided for multiple cards to loop onto. For large, low-income families, losing a purse could be a disaster as it is, much less with all of these costs associated with the cards. For those with the smartphone app, integration between these two systems was requested as backup for situations in which a card is misplaced but there is still value on it.

As direct service providers, NAYA staff and clients present liked the option to load value remotely to the card. This would prevent single-purpose trips to NAYA for clients to pick up bus products, which happens now. On the other hand, for those that do not receive these benefits, the lack of convenient places to add value is a challenge. Participants asked about the reasoning behind why value cannot be added at ticket vending machines. In order to mitigate for those not easily able to access retail values in isolated areas of TriMet's service area, it would be helpful to have some ticket vending machines. This would prevent high costs of implementing them everywhere, but to mitigate for this negative impact in areas most in need of TVMs with efare access.

Overall, participants were excited about the aspects of this system that would make their transit experience more quick and convenient. The maximum load was a draw, as well as the fact that value rolls over month-to-month. This system will be more convenient for clients, and it will be helpful to distribute free cards up front. NAYA would like to explore how we can build a stronger partnership with TriMet so we can identify implementable solutions for a low income fare and so NAYA could become an institutional program so we can better serve our clients and community at-large.

Date: February 24, 2016
To: Board of Directors
From: Neil McFarlane *Neil McFarlane*
Subject: **ORDINANCE NO. 342 OF THE TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET) ADOPTING ELECTRONIC FARE PROGRAM AND PROOF OF FARE PAYMENT PROVISIONS, AND AMENDING TRIMET CODE CHAPTERS 19 AND 29 (SECOND READING)**

1. Purpose of Item

Ordinance No. 342 amends TriMet Code Chapters 19 and 29 to adopt Electronic Fare (“eFare”) Program and Proof of Fare Payment provisions. The eFare Program and Proof of Fare Payment amendments are described in Section 5, Background, below.

2. Type of Agenda Item

- Initial Contract
- Contract Modification
- Other: Ordinance

3. Reason for Board Action

The TriMet Code may be amended only by adoption of an ordinance. Adoption of Ordinance No. 342 requires two readings.

4. Type of Action:

- Resolution
- Ordinance 1st Reading
- Ordinance 2nd Reading
- Other

5. Background

The eFare Program is a major component of TriMet’s continuous effort to modernize and streamline the way transit customers in the region pay fares. The eFare system is a next generation account-based payment system that is intended to eventually replace most paper tickets and passes, and allow all riders to quickly pay their fare by tapping a contactless payment media -- such as a “smart card,” contactless bankcard, or smartphone -- at an electronic reader. The eFare system is a regional electronic fare program jointly developed and funded by TriMet, C-TRAN and the Portland Streetcar.

The eFare system is being designed to incorporate leading edge electronic payment technologies that are in use at many transit agencies around the world, to make travel on transit faster and more convenient for customers, and to provide the region's transit agencies with a more efficient and secure fare collection system. The eFare system will provide riders with the opportunity to take advantage of a variety of benefits not available in the current payment system. The new eFare system will allow riders to:

- Conveniently and quickly pay fares and board vehicles, without the need to carry cash and find exact change.
- Simplify fare payment with a simple green/red light for customers and operators.
- Seamlessly transfer between vehicles, including the Portland Streetcar and C-TRAN.
- Take advantage of stored value and fare "capping" for 1-Day Passes and 1-Month Passes to ensure riders always get the best fare automatically, and "purchase a monthly pass one day at a time" without the upfront cost currently required.
- Purchase fares anytime, anywhere utilizing tools to manage their account either online, by using a smartphone application, by telephone using an interactive voice response system (IVR), or by calling Customer Service. Customers will also have access to an expanded retail network of over 500 stores, including the TriMet Ticket Office, where they can access eFare cards and add value using cash or a bankcard.
- Use the "auto-load" function to automatically add value to an account when the balance drops below a defined threshold.
- Obtain lost card protection with a registered card to protect the customer's value in case of a lost or stolen card, so that value can be transferred to another card. Under the current system, when a rider loses their ticket or pass, they lose the value of that fare.
- Use various forms of payment customers may already carry, such as contactless bankcards, and NFC-enabled smartphones (with services such as Apple Pay or Android Pay). Depending on the media used, the correct fare will either be deducted from the customer's transit account (maintained within the eFare system), or charged to the customer's credit or debit card.

In addition to the substantial benefits afforded to the customer, the eFare system provides many operational advantages for TriMet. The eFare system is designed to make fare collection more efficient by streamlining manual processes, reducing paper in the system and the associated costs of printing and distributing paper fare media, reducing cash and related collection costs, and reducing maintenance costs for older equipment with many moving parts. eFare card readers are highly reliable solid state pieces of equipment without moving parts. The eFare system will also simplify the bus operators' responsibility by presenting them with a simple green or red light to indicate a valid fare, thus reducing their need to visually inspect paper fare media and allowing them to concentrate on safely operating the vehicle.

TriMet began planning for the new eFare system in 2011. TriMet anticipates continued development and testing in 2016, to include testing with limited user groups, with availability to the general public expected in 2017.

Ordinance No. 342 includes fare provisions that are necessary for the ongoing development and implementation of the eFare system, but does not change prices. Ordinance No. 342 includes the following provisions:

- Fare: Stored value and fare “capping” to include 2½ Hour Tickets, 1-Day “Caps” (Passes) and 1-Month “Caps” (Passes). These fares will be available for Adults, Honored Citizens and Youth at the same prices as today. Consistent with the current fare structure, LIFT fares will include single tickets and fare capping for a 1-Month Pass, with no 1-Day Pass available for paratransit service.
- Card Fee: A fee of \$3.00 will be required for reloadable eFare cards to cover the costs of the cards, maintain a strong distribution network, and discourage riders from disposing of cards.
- Minimum Load Value: A minimum \$5.00 load value will be required for eFare cards, except those loaded at TriMet’s Ticket Office, which shall have no minimum requirement.
- Other Payment Media: Other financial instruments, including contactless bankcards, Apple Pay and Android Pay, can be used to purchase Adult 2½ Hour Tickets and 1-Day “Caps” (Passes) -- the 1-Month cap is not available.
- Group Pass Programs: Introduces eFare contactless media for other programs, including colleges and employers.
- Fare Enforcement Provisions: Clarifies the definitions of “Valid eFare Payment Instrument” and “Proof of Payment” requirements for the eFare system.

While the intent is to phase out many of TriMet’s current paper tickets and passes, no fare products are proposed for elimination in Ordinance No. 342. For example, customers that currently “pay as they go” will continue to have the option to pay their fare using cash when riding a bus or train, just as they do today. Following an initial transition period that allows riders to become familiar with how the eFare system works and informs TriMet’s experience operating the new system, TriMet anticipates a future ordinance that will eliminate paper tickets and passes. In the meantime, some vendors may choose to discontinue carrying paper tickets and passes and opt to sell eFare cards only. TriMet will continue to honor paper tickets and passes until the Board elects to eliminate these products.

Title VI Fare Equity Analysis

In accordance with Federal Transit Administration (FTA) Title VI Circular 4702.1B implementing Title VI of the Civil Rights Act, TriMet must assess proposed fare changes to identify potential disproportionate impacts on low-income and minority populations.

A Title VI Fare Equity Analysis (“Analysis”) was conducted which evaluated potential *adverse effects* and analyzed whether there are *disparate impacts* that fall on minority populations more than on others, and whether there are *disproportionate burdens* on low-income riders. Both on-board survey data and community outreach were used to conduct the Analysis, and a written report of the Analysis findings, dated January 6, 2016 (“Title VI Report”), was presented to the Board of Directors (“Board”) for its consideration prior to the January 13, 2016 eFare briefing.

In summary, the Fare Equity Analysis set forth in the final Title VI Report and provided to the Board for adoption of Ordinance No. 342 found three potential barriers to accessing eFare for minority and low-income populations. TriMet has taken or will take the following steps to mitigate these barriers, including:

- Retain paper transfers with a single ticket fare and 1-Day passes for cash paying riders.

- Provide more than 100,000 free eFare cards to the general public, specifically targeting availability for minority and low-income populations.
- Allow eFare system users to register via telephone, without requiring an email address.
- Identify geographic gaps in the retail network and target additional retailers in those areas.
- Conduct targeted outreach to community organizations to boost awareness and educate individuals about the eFare system, with an emphasis on senior citizen, low-income and minority communities.

TriMet may also consider engaging in other mitigation strategies.

Community Outreach and Public Comment

The community outreach described above in the Title VI Fare Equity Analysis entailed partnering with six community based organizations to hold seven discussion groups, specifically focusing on low-income and minority TriMet riders. These discussion groups solicited feedback on proposed policy changes, providing a qualitative component to the Analysis. Findings were included in the Title VI Report provided to the Board in advance of its January 13, 2016 eFare briefing, as well as presented and discussed at the briefing itself.

In addition, public comment on the Ordinance No. 342 provisions is accepted by phone, email and standard mail. A report summarizing comments received via these venues and describing TriMet's comprehensive community engagement activities will be provided to the Board prior to their February 24, 2016 meeting. Verbal and written testimony were also provided by the public during Public Forum and at the Public Hearing on January 27, 2016.

6. Financial/Budget Impact

The capital cost of the eFare system is expected to be approximately \$34.4 million, and has been incorporated in annual budgets and financial forecasts.

7. Impact if Not Approved

Should the Board not proceed with a second reading of Ordinance No. 342, the existing fare provisions of the TriMet Code would remain in place. However, because Board approval of certain eFare Program and proof of fare payment provisions is required for eFare implementation, staff recommends that the Board conduct a second reading and approve Ordinance No. 342 at their February 24, 2016 meeting in order to facilitate the implementation of the eFare Program.

ORDINANCE NO. 342

**AN ORDINANCE OF THE TRI-COUNTY METROPOLITAN
TRANSPORTATION DISTRICT OF OREGON (TRIMET) ADOPTING
ELECTRONIC FARE PROGRAM AND PROOF OF FARE PAYMENT
PROVISIONS, AND AMENDING TRIMET CODE CHAPTERS 19 AND 29**

THE BOARD OF DIRECTORS OF THE TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET), pursuant to the authority of Oregon Revised Statutes Chapter 267, having considered the fare equity analysis Title VI Report, does hereby ordain and decree the following Ordinance:

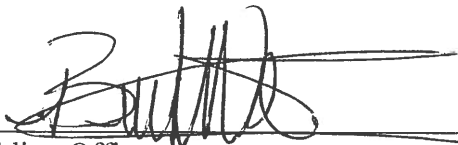
**Section 1 – Adoption of Electronic Fare Program and Proof of Fare Payment Provisions;
Amendment of TriMet Code Chapters 19 and 29**

TriMet Code (TMC) Chapters 19 and 29 shall be amended as set forth on the attached Exhibit A, which is incorporated into and made part of this Ordinance No. 342.

Section 2 – Effective Date

This Ordinance shall take effect thirty days after the date of its adoption.

Date Adopted: February 24, 2016




Presiding Officer

Attest:

Kelly Ruxton
Recording Secretary

Approved as to Legal Sufficiency:



Legal Department

THIS PAGE LEFT INTENTIONALLY BLANK

**ORDINANCE NO. 342
EXHIBIT A**

TriMet Code (TMC) Chapter 19 Fares and TMC Chapter 29 Proof of Fare Payment, are amended as set forth below. Deletions are shown in brackets with a line through the text, and additions are shown in underlined, bold text.

I. TMC Section 19.15 Fares:

A. The following text shall be added to TMC Section 19.15 as Paragraph C:

C. Electronic Fare (“eFare”) Program

Use of an electronic fare payment system (“eFare”) Program shall be subject to the following fare provisions:

(1) eFare Cards

(a) An eFare card is a contactless electronic fare instrument that allows a rider to tap at designated card readers to pay their fare.

(b) The rider must tap their eFare card prior to each vehicle boarding to validate their trip or upon occupying district areas requiring proof of fare payment.

(c) eFare cards are non-transferable.

(d) The following fares shall be available using stored value from an eFare card account, according to the status of the rider:

i. 2 ½ Hour Ticket

A rider shall be allowed unlimited rides for a duration of 2 ½ hours following the initial eFare card tap.

<u>Status</u>	<u>Fare</u>
<u>YOUTH</u>	<u>\$1.25</u>
<u>HONORED CITIZEN</u>	<u>\$1.25</u>
<u>ADULT</u>	<u>\$2.50</u>

ii. 1-Day Pass

Fares paid per card tap shall accumulate, and a rider shall be charged only up to the applicable 1-Day Pass price and not

more (“capped”), regardless of how many taps the rider accrues during the service day. Once charges accrue to the applicable 1-Day Pass price during a service day, additional trips are free for the remainder of that service day.

<u>Status</u>	<u>Fare</u>
<u>YOUTH</u>	<u>\$2.50</u>
<u>HONORED CITIZEN</u>	<u>\$2.50</u>
<u>ADULT</u>	<u>\$5.00</u>

iii. 1-Month Pass

Fares paid per card tap shall accumulate, and a rider shall be charged only up to the applicable 1-Month Pass price and not more (“capped”), regardless of how many taps the rider accrues during the calendar month. Once charges accrue to the applicable 1-Month Pass price during a calendar month, additional trips are free for the remainder of that calendar month.

<u>Status</u>	<u>Fare</u>
<u>YOUTH</u>	<u>\$28.00</u>
<u>HONORED CITIZEN</u>	<u>\$28.00</u>
<u>ADULT</u>	<u>\$100.00</u>

- (e) Reloadable eFare cards shall be available for purchase for a fee of \$3.00.
- (f) A minimum \$5.00 load to an eFare card account shall be required, except that no minimum load shall be required for eFare cards loaded at the TriMet Ticket Office.
- (g) Annual Passes may be purchased as one lump sum, according to the requirements set forth in TMC Section 19.15 (A) (4). Annual Passes shall be issued in the form of an eFare card.
- (h) Payment of fares for LIFT paratransit services by an eFare card shall be initiated either by tapping a card reader, or payment shall be deducted from the rider’s account when the LIFT operator picks up the rider and confirms the rider’s trip through their Mobile Driver Terminal (MDT). LIFT payments in this paragraph (h) exclude rides paid for by agencies under contract with TriMet. The following LIFT paratransit fares shall be available for payment from an eFare card account:

- i. Single Ticket: \$2.50
- ii. 1-Month Pass: \$74.00. Fares paid shall accumulate, and a rider shall be charged only up to the applicable 1-Month Pass price and not more (“capped”), regardless of how many taps the rider accrues during the calendar month. Once charges accrue to the applicable 1-Month Pass price during a calendar month, additional trips are free for the remainder of that calendar month.
- iii. Annual Passes may be purchased as one lump sum, according to the requirements set forth in TMC Section 19.15 (B) (1)(d).
- iv. Payment of a LIFT fare under this paragraph (h) shall be valid as payment for travel on regular fixed-route service. In the case a rider begins their trip on fixed-route by tapping their LIFT eFare card, the applicable Honored Citizen fare and fare identification requirements shall apply.

(2) Other eFare Payment Instruments

Financial instruments issued by the major payment brands including VISA, MasterCard, American Express and Discover that are capable of providing payment through contactless tapping at designated card readers may be used to purchase the Adult 2 ½ Hour Ticket and Adult 1-Day Pass per paragraphs (1) (d) (i) and (ii) above. The rider must tap their fare payment instrument prior to each vehicle boarding to validate their trip or upon occupying district areas requiring proof of fare payment.

B. Paragraph (A) (5) Select Term Pass Program is amended as follows:

- (a) Colleges with a campus(es) located within the TriMet district may purchase for their qualified students at that campus(es), Term passes in accordance with the Select Term Pass program requirements set forth in this Paragraph (5) and the administrative program requirements established for the fare. A “campus” means a building(s) located at one physical location within the TriMet district under the control of a college. “Qualified students” are either full-time or part-time students, as defined by the college administrative criteria, who attend class at a campus. The college shall be required to enter into a written contract for purchase of the Select Term Pass in accordance with the administrative program requirements established for the fare. ~~[The Select Term Pass fare instrument shall consist of the student’s college photo identification card with the student’s name, with an affixed TriMet issued validation sticker, and must be carried by the student as proof of fare payment.]~~ The Select Term Pass fare instrument shall be valid for travel for the Term Pass fare period.
- (b) ~~[Qualified students are either full-time or part-time students, as defined by the college administrative criteria, who attend class at a campus as defined in Paragraph (5) (a).]~~ The Select Term Pass fare instrument shall consist of the

student's college photo identification card with an affixed TriMet issued validation sticker, or a TriMet approved eFare Program card ("eFare card"), and must be carried by the student as proof of fare payment.

(i) If using TriMet issued validation stickers, colleges shall provide the student with a photo identification card, which shall also include the college's name. The validation sticker must be placed on the photo identification card. A student's photo identification card with an affixed Term validation sticker shall be valid through the month and year designated on the sticker.

(ii) Colleges may use a TriMet approved eFare card, which shall be required to display the college's name, the student's name, and may include the student's photo. If the approved eFare card does not include a photo, the student may be asked to display other valid photo identification as proof of their identity. Students are required to tap their eFare card prior to each vehicle boarding and upon occupying any district areas requiring proof of fare payment.

(iii) Colleges shall verify student status before providing an individual with a Term Pass fare instrument. The Term Pass fare instrument may not be provided to or used by non-students, is non-transferable, and is a valid fare instrument only for the person whose name appears on the card.

* * *

C. Paragraph (C) Universal Annual Pass Fare Program is amended as follows:

[E]D. Universal Annual Pass Fare Program

* * *

(5) The Universal Pass fare instrument shall consist of the employee's photo identification card with an affixed TriMet issued annual validation sticker or a TriMet approved eFare Program card ("eFare card"), and must be carried by the employee as proof of fare payment.

(a) If using TriMet issued validation stickers, [E]employers shall provide the employee with a photo identification card which must include the employee's name and the company's name. The validation sticker must be placed on the photo identification card. [Employers shall verify employee status before providing an individual with a Universal Pass fare instrument. The Universal Pass fare instrument may not be provided to or used by non-employees, and is a valid fare instrument only for the person whose name and photo appear on the identification card.] An employee's photo identification card with an affixed TriMet annual validation sticker shall be valid through the month and year designated on the sticker [, and shall allow travel for TriMet services within the

District, including regular service and door-to-door LIFT service].

(b) Employers may use a TriMet approved eFare card, which shall be required to display the employer's name and the employee's name, and may include the employee's photo. If the approved eFare card does not include a photo, the employee may be asked to display other valid photo identification as proof of their identity. Employees are required to tap their eFare card prior to each vehicle boarding and upon occupying any district areas requiring proof of fare payment.

(c) Employers shall verify employee status before providing an individual with a Universal Pass fare instrument. The Universal Pass fare instrument may not be provided to or used by non-employees, is non-transferable and is a valid fare instrument only for the person whose name appears on the card.

A Universal Pass fare instrument shall allow travel for TriMet services within the District, including regular service and door-to-door LIFT service.

(6) Subject to subparagraph (c) below, the pass price shall be calculated on an annual basis, from September 1 through August 31. For employers purchasing the pass mid-year, the price shall be pro-rated based on the number of months remaining in the year (September 1 through August 31).

(a) For each employer contract, TriMet will issue [~~annual validation stickers~~] **Universal Pass fare instruments** for all qualified employees at the contract price. If an employer hires additional qualified employees during the contract term, the employer shall purchase additional [~~stickers~~] **fare instruments** at the prorated cost for the additional new hires.

* * *

D. Paragraph (D) Universal Term Pass Fare Program is amended as follows:

~~(D)~~ **E. Universal Term Pass Fare Program**

* * *

(4) The Universal Term Pass fare instrument shall consist of the student's photo identification card showing the student's name with an affixed TriMet issued Term validation sticker, **or a TriMet approved eFare Program card ("eFare card")**, and must be carried by the student as proof of fare payment.

(a) If using TriMet issued validation stickers, [C] colleges shall provide the student with a photo identification card, which shall also include the college's name. The validation sticker must be placed on the photo identification card. A student's photo identification card with an affixed Term validation sticker shall be valid through

the month and year designated on the sticker. [~~Colleges shall verify student status before providing an individual with a Universal Term Pass fare instrument. The Universal Term Pass fare instrument may not be provided to or used by non-students, and is a valid fare instrument only for the person whose name and photo appear on the identification card.~~]

(b) Colleges may use a TriMet approved eFare card, which shall be required to display the college's name, the student's name, and may include the student's photo. If the approved eFare card does not include a photo, the student may be asked to display other valid photo identification as proof of their identity. Students are required to tap their eFare card prior to each vehicle boarding and upon occupying any district area requiring proof of fare payment.

(c) Colleges shall verify student status before providing an individual with a Universal Term Pass fare instrument. The Universal Term Pass fare instrument may not be provided to or used by non-students, is non-transferable and is a valid fare instrument only for the person whose name appears on the card.

~~[A student's photo identification card with an affixed Term validation sticker shall be valid through the month and year designated on the sticker, and-]~~ **A Universal Term Pass fare instrument** shall allow travel for TriMet services within the District, including regular service and door-to-door LIFT service.

* * *

I. TMC Chapter 29 Proof of Fare Payment

TMC Section 29.10 Definitions is amended as follows:

* * *

E. "Proof of Fare Payment" means:

- (1) A TriMet pass or a C-Tran (Clark County Public Transportation Authority) pass valid for the status of the person and the time of use;
- (2) A receipt, including a digital image of an activated mobile ticket on a person's phone, showing or evidencing payment of the applicable fare, valid for the status of the person, used within the time applicable to the receipt;
- (3) A prepaid ticket or series of tickets showing validation by TriMet time stamp, valid for the status of the person, used within the time applicable to the ticket;
- (4) A TriMet issued validation sticker affixed to a photo identification card that is issued by TriMet, an employer or college and is valid for the period designated on the sticker, and used by the person whose name and photo appear on the identification card; [øf]

(5) A valid eFare Payment Instrument; or

- (6) Any other fare instrument and any fare identification or documentation required by TMC Chapter 19 or by experimental fare ordinance.

* * *

G. “To Exhibit Proof of Fare Payment” for an eFare Payment Instrument means:

- (1) **To present a valid eFare Payment Instrument and to permit scanning of the person’s eFare Payment Instrument by Inspectors or peace officers, to demonstrate the eFare Payment Instrument’s validity; or**
- (2) **To show any other fare instrument and any fare identification or documentation required by TMC Chapter 19 or by experimental fare ordinance for use of the eFare Payment Instrument.**

H. “Valid eFare Payment Instrument” means an eFare card or ticket, or any contactless financial instrument authorized by TMC Chapter 19 for payment of electronic fare that has been:

- (1) **Tapped and accepted at an eFare card reader; or**
- (2) **Validated by a TriMet ticket vending machine or other TriMet validation equipment;**

prior to each vehicle boarding or upon occupying any district area requiring proof of fare payment.

President Warner stated that he is a great supporter of Ride Connection and looks forward to hearing about the partnerships and programs in place.

Action: Joe Esmonde moved approval of Resolution 16-02-12; Lori Irish Bauman seconded the motion. The motion was unanimously approved.

Resolution 16-02-13 Authorizing a Contract with Zimmer Gunsul Frasca Architects LLP for Design Services for the Westside Bike and Ride Bike Parking Project

Director Bethel asked if we could use the same plan as we did for the Beaverton Transit Center and save money.

Neil McFarlane stated that we will need a unique plan for Goose Hallow to match the station architecture and area surroundings. What the two plans do have in common is the overall program on how we use the site, the layout, and security precautions. One of the tasks included in this project is to provide standard specifications for future projects.

Action: T. Allen Bethel moved approval of Resolution 16-02-13; Craig Prosser seconded the motion. The motion was unanimously approved.

Resolution 16-02-14 Board of Directors, Acting in its Capacity as the TriMet Contract Review Board, Exempting from Competitive Bidding Requirements a Contract for Design, Furnish and Install Services for the CCTV-Based Intrusion Detection Project

Director Stovall stated that TriMet has been very successful in doing this type of procurement in the past and is confident in our track record, but does want to understand for clarity of transparency how we determine which projects are exempt from competitive bidding requirements.

Neil McFarlane stated that we do have a lengthy checklist that we go through, along with a public hearing and findings before recommending for Board approval. Mr. McFarlane stated that staff would be happy to provide an overview on that process.

Action: Joe Esmonde moved approval of Resolution 16-02-14; Travis Stovall seconded the motion. The motion was unanimously approved.

5. Ordinance 342 An Ordinance of the Tri-County Metropolitan Transportation District of Oregon (TriMet) Adopting Electronic Fare Program and Proof of Fare Payment Provisions, and Amending TriMet Code Chapters 19 and 29 (Second Reading)

General Counsel Shelley Devine read Ordinance 342 by title only.

The following people spoke on Ordinance 342 during public forum:

Michelle Zellers, TriMet rider and a member of OPAL and Bus Riders Unite (BRU), spoke on Ordinance 342 and stated that she and other BRU members spent time on transit talking with people about TriMet Administration's plan for eFare. Ms. Zellers stated that while many passengers support eFare, many shared OPAL's equity concerns and believe that transit should be shaped by users and asked that the Board ensure that any new system is family friendly, inclusive of low-income people and safe for communities of color.

David Bouchard spoke on Ordinance 342 and stated that the design and implementation of eFare is an exciting development and has great potential, but what is of concern to OPAL is the lack of group and low-income fares for eFare and shared that there are transit agencies across the country that provide these fares and talked about the benefits that these valuable options would provide. (Written testimony provided and made part of this Board record.)

Orlando Lopez read written testimony from Zoemy Tuz and Lucia Llanos Pinos regarding Ordinance 342 that is included in this Board record and suggested that TriMet hold meetings at a time when working people can attend.

Neil McFarlane stated that today's second reading and vote of Ordinance 342 will put into policy changes needed to fully realize the electronic fare system's potential. The policies, impacts and our mitigation efforts are well balanced taking into consideration equity, business needs, and the overall impact to our customers. As you have heard, we have done quite a bit of outreach to communities who may be affected most by our e-fare system.

Neil McFarlane responded to comments made during public forum on Ordinance 342:

- In response to the request for a family fare, Mr. McFarlane noted that because of the individual price caps proposed, this would be difficult to implement. We currently have individual fares, so the implementation of eFare would not change this. If in the future the Board would like to consider multiple use cards we would then need to consider cap provisions and how it would be implemented.
- Mr. McFarlane stated that the public and the Board have expressed interest in a low-income fare. Research is currently under way led by John Gardner, Director of Diversity and Transit Equity, to look at the experiences of other transit districts and how it would impact the expanding system.
- While retail outlets are an important part of reloading cards, there are many opportunities to pay including the ability to load your card by phone. Neil McFarlane noted that Chris Tucker is continuing to work with Plaid Pantry with the hope to merge technology that would broaden the retail network.

Mr. McFarlane added that today's action would begin the process of establishing the rules of the road for eFare and then we can begin the broader outreach that is included as part of the proposed budget. This process is a building block that we can continually improve on over time.

Director Prosser stated that it was mentioned during public testimony that an individual was hoping that the retail network would be expanded to include neighborhood stores that were primarily Hispanic so that they could explain how to use the card. Director Prosser stated that he imagined that the retailers would sell/reload cards, but not be responsible for teaching people how to use them.

Neil McFarlane stated that Director Prosser is correct, that while some markets are more full service than others, the primary job of the outlet is to sell or reload the card. It will be important to work with partners to provide a variety of outreach and bi-lingual opportunities to teach people how to use the cards.

President Warner asked when eFare will be operational.

Neil McFarlane stated that we will set an implementation schedule based on the results of the integrated lab testing that will be done at the end of next month. Currently, we estimate that eFare would be operational January 2017.

President Warner stated that one concern we have heard is about the security of information provided in the system, and asked what changes we have made based on that feedback.

Neil McFarlane stated that we appreciated the feedback and that customers will have the option of registering with an alias and an ID number so they can have the benefit of fare capping, but still remain anonymous.

President Warner asked for an explanation of what fare capping is.

Neil McFarlane explained that the system will determine the best fare for a customer. Once a customer has paid the cost of a day pass or the cost of a monthly pass, the system shows that the customer is paid up respectively. This essentially allows a customer to buy the fare one day at a time while getting the benefit of a monthly pass. The other benefit of eFare is loss protection. If the card is registered, and then if the card is lost, we can transfer the available funds to another card based on information and contact from our customer. Neil McFarlane noted that other benefits include faster boarding for our customers and easier identification of fares for our operators.

Present Warner asked that if people do not have a card and only cash, how will that work once the system is implemented.

Neil McFarlane explained that all our current vending machines still take cash for the purchase of ticket products and that cash will still be taken at the fare box with transfers issued. Once the market determines there is no longer a demand for cash purchases, we would do another equity analysis to determine what permanent changes need to be made.

Director Stovall asked what the financial impact of fare capping would be to the agency.

Neil McFarlane stated that our financial forecast is based on eFare being in place and asked Chris Tucker to share specific details.

Chris Tucker responded that fare capping on a monthly basis is a new concept and the model we looked at in Canada felt that fare capping was of minimal concern and estimated 1 to 1-1/2% of lost fare revenue due to fare capping and that is what we have planned for. As the eFare system ramps up, we will see other gains due to faster boarding, reduction in cash purchases and maintenance of TVMs.

Director Stovall stated that as he has shared before, he is a huge proponent of poverty to prosperity and is excited to see that fare capping will benefit low-income riders to the tune of \$1 to 1-1/2 million annually. TriMet has been a top innovator nationally and hope we can continue that as we consider a family pass. As has been discussed, there are many options available to reload cards outside of the retail outlets, and Chris Tucker confirmed that 80% of TriMet riders use smart phones and that we have estimated that roughly 25-30% of our riders will use retail network to reload cards.

Chris Tucker stated that over time the use of smart phones will increase and as we have seen with TVM usage since the implementation of electronic fare, the use of retail networks will decrease.

Director Prosser stated that one issue that has been raised is the initial cost of the card at \$3.00 with a minimum \$5.00 load and the hardship that would be on low-income riders.

Chris Tucker stated that TriMet will work with social service agencies and other partners to distribute 200,000 free cards to low-income riders.

Director Stovall stated that although there are many options to reload cards, he would like to see as many retail outlets as possible, including Plaid Pantries. Director Stovall stated the importance of education during the roll-out of this system.

President Warner stated that the Board has seen the outreach that has been done to the potentially affected communities of these policy changes and have heard from community members through various channels including last month's public hearing. Our Transit Equity Advisory committee reviewed and also provided comments on the January 6, 2016 Equity Analysis that was done. The Board was

briefed on the analysis at its January 13th briefing and endorsed its findings at our January 27th meeting. Staff will continue outreach and education as we move towards implementation of eFare.

Director Stovall stated that this is a critical step moving forward for the region and our riders and we have been very deliberative and responsive to the comments received and would like to reiterate the importance of stepping out to be a leader in the concept of a family pass and to continue to be open to new ideas and innovation.

Director Bethel asked that those who would like us to consider the idea of tapping one card for all family members spend energy looking at the implications of the family pass and offer suggestions and proposed solutions on how to implement, not just offer why we need to have one. Although we can't promise to implement all or any of the suggestions, we can promise to continue considering innovative ways to be the best transit agency in the nation.

President Warner stated that he supports this ordinance that would benefit all riders and improve our current fare system in an innovative way. President Warner stated that he is looking forward to learning more about what other agencies have done with low-income and family fares and partnering with advocates on mitigation efforts.

Action: Travis Stovall moved approval of Ordinance 342; T. Allen Bethel seconded the motion.

The following roll call vote resulted in the approval of Ordinance 342:

Craig Prosser.....	Yes
Lori Irish Bauman.....	Yes
Travis Stovall.....	Yes
Bruce Warner.....	Yes
T. Allen Bethel.....	Yes
Joe Esmonde.....	Yes

6. Other Business & Adjournment

There was no further business to come before the Board

President Warner adjourned the meeting at 10:55 a.m.

Respectfully submitted,



Kelly Runnion, Recording Secretary

Attachment N

SPRING 2016 – SPRING 2017 SERVICE EQUITY ANALYSIS, WITH
DOCUMENTATION OF BOARD APPROVAL



Equity Analysis: Spring 2016 - Spring 2017 Service Changes

Final Report

March 16, 2016

Executive Summary

TriMet is proposing to implement several service improvements over the next year, made possible by the TriMet Board of Directors' approval of the payroll and self-employment tax rate increase in September 2015. In accordance with Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B, TriMet conducts an Equity Analysis any time Major Service Changes are proposed to ensure that changes do not unfairly impact people of color and low-income populations. The service proposals for the next year include eight Major Service Changes, requiring such an analysis prior to the Board taking action.

Methodology

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

Major Service Changes

Proposed changes to the following eight lines meet TriMet's established threshold for Major Service Change:

- Line 20-Burnside/Stark:** Service increase of over 25%
- Line 21-Sandy Blvd/223rd:** Service increase of over 25%
- Line 36-South Shore:** Route change of over 25%
- Line 63-Washington Park/Arlington Hts:** New weekend service
- Line 71-60th Ave/122nd Ave:** Split route
- Line 83-Washington Park Loop:** Discontinue route
- Line 87-Airport Way/181st:** Service increase of over 25%
- Line 97-Tualatin-Sherwood Rd:** New bus line

Findings

- **No Disparate Impact on minority populations**
 - Service improvements benefit minority populations as much or more than others.
 - The few reductions do not disproportionately impact minority populations.
- **No Disproportionate Burden on low-income populations**
 - Service improvements benefit low-income populations as much or more than others.
 - The few reductions do not disproportionately impact low-income populations.

I. Background

In September 2015 the TriMet Board of Directors (“Board”) approved a payroll and self-employment tax rate increase which will provide additional revenue for transit service in the District over the next ten years. The agency has been engaging the community for the past few years to develop a shared vision for future transit service that will guide how the additional revenue is invested. Each year, TriMet staff will use information developed from the shared vision planning efforts and outreach, updated analyses and measures, and additional outreach to prioritize incremental service improvements for that year. The efforts will focus on five factors defined by the TriMet Board: demand, productivity, connections, equity, and growth. Each year’s plan will also consider safety, budget availability, and availability of staff and equipment to provide for expanded service.

To implement the shared vision, TriMet’s intention is to roll out service improvements every spring and fall, beginning in spring 2016. Staff has developed the next three packages of proposed service changes, through spring 2017, to cover FY2017 and synchronize the Annual Service Plan with agency budget decision-making. This report documents the equity analysis conducted for these changes.

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

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

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

II. TriMet Title VI Compliance

TriMet’s Title VI Program ¹ outlines the agency’s policies, definitions and procedures for complying with Title VI and performing equity analyses. As required by the Circular, this includes the agency’s Major Service Change, Disparate Impact, and Disproportionate Burden policies, as set forth below.

A. Major Service Change Policy

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

¹ TriMet’s Title VI Program received concurrence from the FTA in January 2014

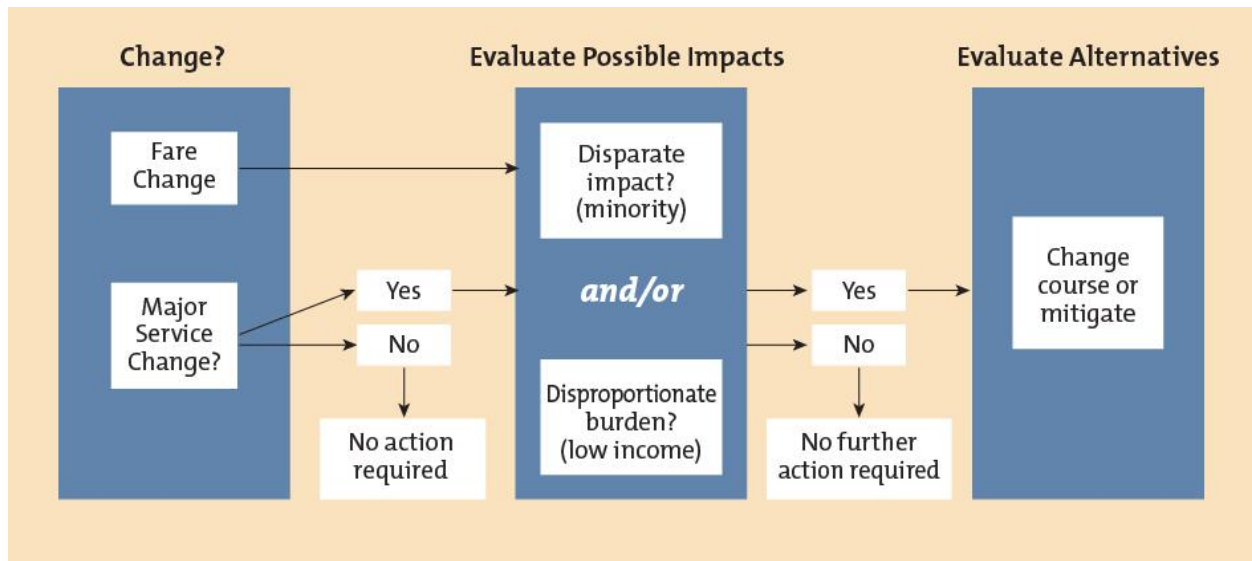


Figure 1: Overview of TriMet's Title VI Equity Analysis process

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 as defined in the Introduction of TriMet's Title VI Program.
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.

B. Disparate Impact Policy

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

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

For lines with Major Service Changes, if the percentage of minority population in block groups² served by the impacted portion of the line (sum of minority population in all impacted block groups divided by the total population in all impacted block groups) exceeds the percentage of minority population in the TriMet District as a whole, the impacts of changes to the line will be considered disparate.

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 (sum of minority population in all impacted block groups divided by the minority population of the TriMet District as a whole) is compared to the percentage of impacted non-

minority population (sum of non-minority population in all impacted block groups divided by the non-minority population of the TriMet District as a whole). Comparisons of impacts between minority and non-minority 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.

C. Disproportionate Burden Policy

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

III. Proposed Service Changes

A. Description of Changes

Table 1 on the next page lists the proposed service changes by the quarter in which they would take effect. Most changes proposed for the next year are service improvements, enabled by the additional revenue TriMet will receive from the payroll and self employment tax rate increases. However, two of the proposed changes – to Line 36 and Line 83 to increase operational efficiencies and eliminate redundancy – qualify as reductions in service .

B. Major Service Change Test

To determine whether individual service changes meet the definition of Major Service Change, current and proposed service are compared. Revenue vehicle hours, or the number of hours buses are serving riders, are used to determine changes in service by route. Changes to route length are also calculated. Changes of 25% or more qualify as Major Service Changes.

Results of the comparison are shown in Tables 2 and 3. To summarize, eight lines meet TriMet’s adopted Title VI Major Service Change definition:

Line 20-Burnside/Stark: Service increase of over 25%

Line 21-Sandy Blvd/223rd: Service increase of over 25%

Line 36-South Shore: Route change of over 25%

Line 63-Washington Park/Arlington Hts: New weekend service

Line 71-60th Ave/122nd Ave: Split route

Line 83-Washington Park Loop: Discontinue route

Line 87-Airport Way/181st: Service increase of over 25%

Line 97-Tualatin-Sherwood Rd: New bus line

Table 1: Proposed service changes, spring 2016-spring 2017

Quarter	Line	Service Change Description
Spring 2016	12-Barbur/Sandy Blvd	➤ Add late night and early morning trips on weekdays.
	57-TV Hwy/Forest Grove	➤ Add late night and early morning trips on weekdays.
	72-Killingsworth/82 nd	➤ Add early morning trips.
	75-Cesar Chavez/Lombard	➤ Extend all southbound weekday evening trips to downtown Milwaukie.
	76-Beaverton/Tualatin	➤ Add earlier and later trips on Sundays.
	78-Beaverton/Lake Oswego	➤ Add trips on Saturdays and Sundays.
	87-Airport Way/181 st	➤ Trips added midday weekdays between 182 nd /Powell and Gateway Transit Center.
Summer 2016	83-Washington Park Loop	➤ Discontinue service (replaced by new Line 63 weekend service).
	97-Tualatin-Sherwood Rd	➤ New bus line between Tualatin and Sherwood along Tualatin-Sherwood Rd.
Fall 2016	4-Division/Fessenden	➤ Add late night and early morning trips weekdays.
	32-Oatfield	➤ Add morning and evening trips weekdays.
	36-South Shore	<ul style="list-style-type: none"> ➤ Change southwestern end of route to stay on Jean Rd, and continue to the Tualatin Park & Ride via Boones Ferry Rd. ➤ Discontinue service to Pilkington, Childs, 65th, and McEwan.
	63-Washington Park/Arlington Hts	➤ Add year-round weekend service (replaces Line 83 summer weekend service).
	71-60 th Ave/122 nd Ave	➤ Split line at Parkrose/Sumner TC and make two separate bus lines. One to continue on the 60th Avenue side and be called 71-60th Ave. The other, on 122nd Ave, to have additional weekday rush hour trips.
Spring 2017	20-Burnside/Stark	<ul style="list-style-type: none"> ➤ Add trips weekdays. ➤ Increase Sunday service to match Saturdays.
	21-Sandy Blvd/223 rd	➤ Trips added weekdays.
	155-Sunnyside	<ul style="list-style-type: none"> ➤ Extend route east to serve new Happy Valley Crossroads mixed use development. ➤ Remove loop at current eastern end of route.

Table 2: Change in service hours by line

Line	Current Revenue Vehicle Hours	Proposed Revenue Vehicle Hours (Estimated)	Change in Daily Revenue Hours From Current Quarter	Major Service Change?
4-Division/Fessenden (Weekday)	339	342	+1%	
12-Barbur/Sandy Blvd (Weekday)	173	175	+1%	
20-Burnside/Stark (Weekday)	222	243	+9%	
20-Burnside (Sunday)	106	162	+53%	✓
21-Sandy Blvd/223 rd (Weekday)	48	60	+25%	✓
32-Oatfield (Weekday)	37	40	+8%	
57-TV Hwy/Forest Grove (Weekday)	148	150	+2%	
63-Washington Park/Arlington Hts (Saturday & Sunday)	N/A	9	New Service	✓
71-122 nd Ave* (Weekday)	77	95	+23%	
72-Killingsworth/82 nd (Weekday)	279	281	+1%	
75-Cesar Chavez/Lombard (Weekday)	227	230	+1%	
76-Beaverton/Tualatin (Sunday)	31	37	+21%	
78-Beaverton/Lake Oswego (Saturday)	42	43.5	+4%	
78-Beaverton/Lake Oswego (Sunday)	29	35	+22%	
83-Washington Park Loop (Saturday & Sunday)	13	0	-100%	✓
87-Airport Way/181 st (Weekday)	30	40	+33%	✓
97-Tualatin-Sherwood Rd	N/A	16	New Line	✓

*Only the 122nd Ave portion has a proposed service increase, so current and proposed service hours reflect only that segment.

Table 3: Change in route length by line

Line	Current Route Length	Added (% Change)	Removed (% Change)	Major Service Change?
36-South Shore	7.8 miles*	0.7 miles (+9%)	2.1 miles (-27%)	✓
71-60 th /122 nd Ave	22.7 miles	Split route		✓
155-Sunnyside	5.3 miles	1.1 miles (+21%)	0.6 miles (-11%)	

*Reflects length of most trips, which does not include peak-hour trips to/from downtown Portland

C. Line-level Analyses

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

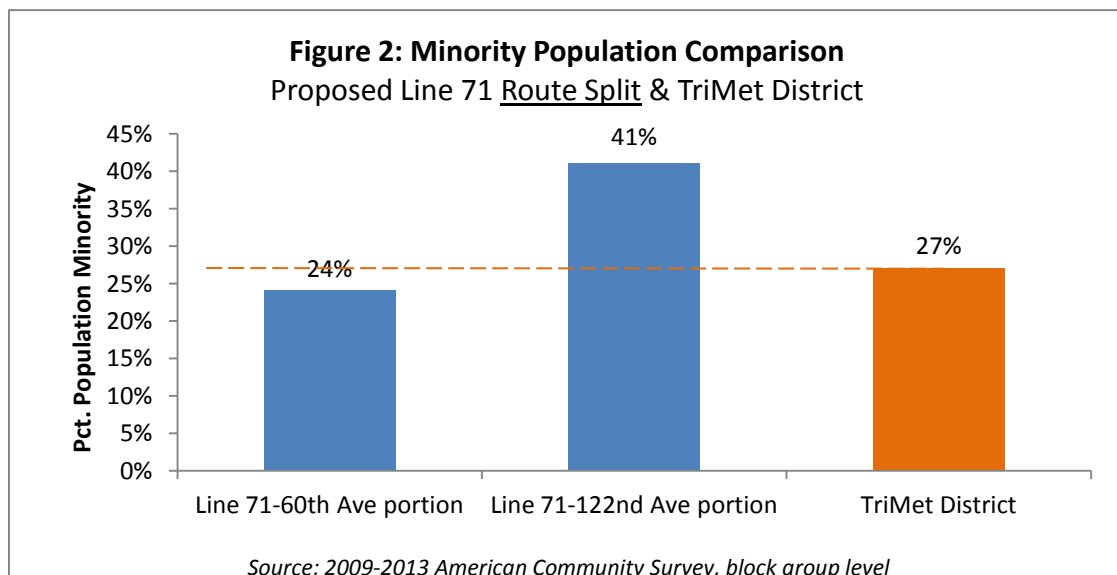
The line-level analysis compares minority and low-income populations for the service area of each line proposed for a Major Service Change to the minority and low-income populations of the TriMet District as a whole. The analysis is separated by type of service change being proposed:

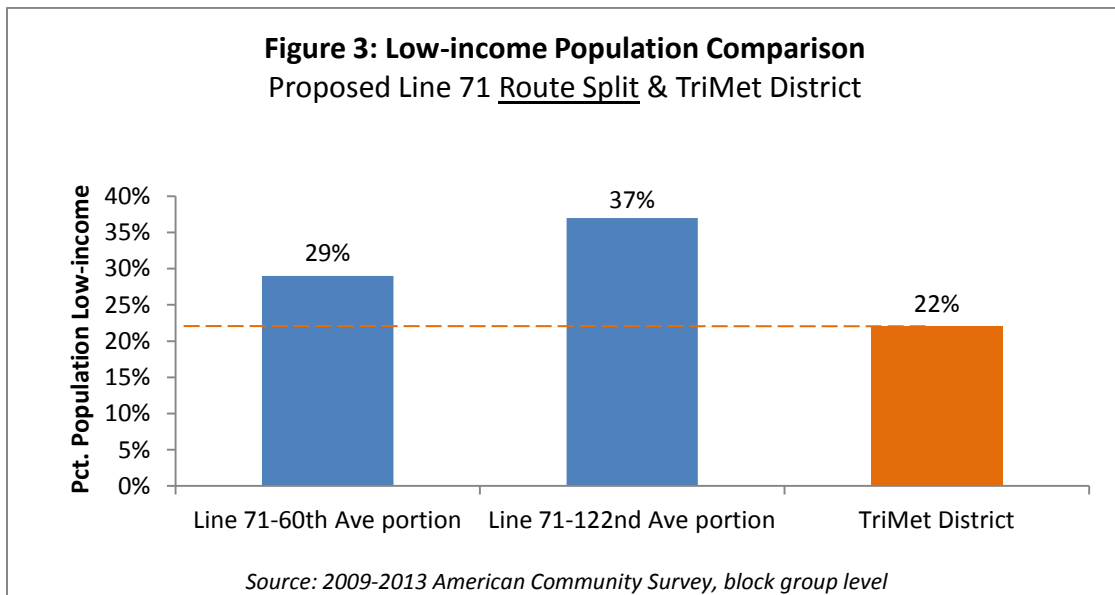
1. **Route Split**
2. **Major Service Reductions**
3. **Major Service Increases**

For a visual representation of the geographic analysis, see the maps in Appendix A.

1. **Route Split**

On its own, splitting a route does not necessarily cause *adverse effects* or benefits for riders. TriMet still analyzed the details of the proposed change to the Line 71 below for potential equity impacts. Figure 2 displays the minority population along each portion of the line as compared to the 27% TriMet District minority population. Figure 3 displays the low-income population along each portion of the line as compared to the 22% TriMet District low-income population. The narrative analysis of the proposed change follows.





Line 71 (Route split)

The Line 71 is proposed to be split into two routes at Parkrose/Sumner Transit Center. This would be done because the portion that currently runs between there and Foster & 94th Ave is proposed for an increase in service, bringing its frequency up to approximately every 15 minutes during weekday peaks. The other segment – between Clackamas Town Center and Parkrose/Sumner Transit Center – does not currently have the demand to warrant the same increase, and would maintain its current level of service running every 16-20 minutes during weekday peaks.

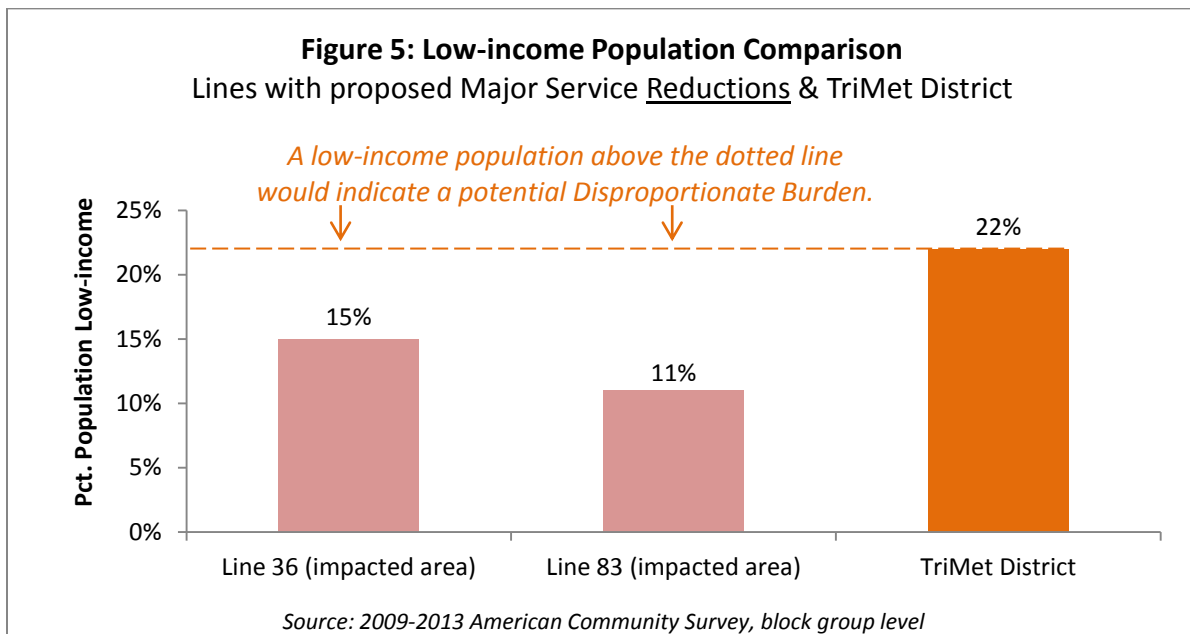
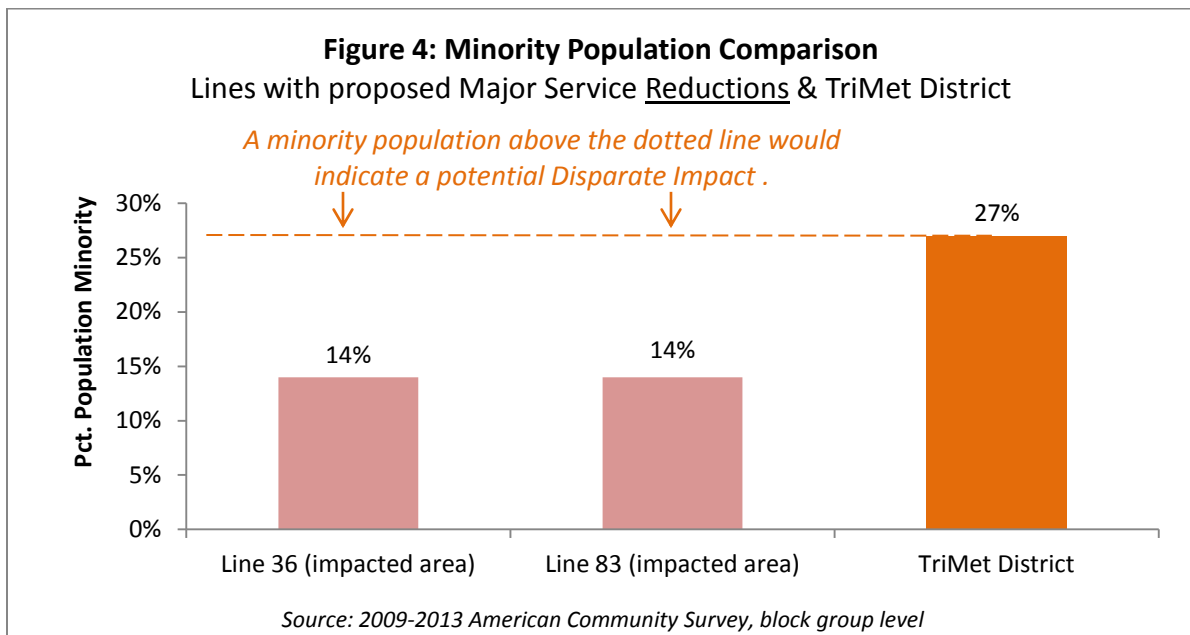
Besides increased frequency on the 122nd Ave portion, the other result of this change is that the route would essentially be “shortened” because it will end at Parkrose for both segments. Riders would need to make a transfer to travel to the other portion of the current route. While impactful for some riders, this proposed route split does not constitute an *adverse effect* under TriMet’s Title VI policies because it would not decrease span or frequency of service, and would not increase access distance to beyond one-quarter mile. Without the presence of an *adverse effect*, there is **no Disparate Impact** and **no Disproportionate Burden**.

Despite these findings, it is still noted that the service area of the Line 71-60th Ave portion has a population that is 29% low-income, which is above-average compared to the TriMet district as a whole. At 24%, the minority population for that portion is below-average for the district.

The service area of the Line 71-122nd Ave portion has a 41% minority population and 37% low-income population – both above average for the TriMet district.

2. Major Service Reductions

For service reductions the analysis examines whether *adverse effects* are disproportionately borne by minority and/or low-income populations. If *adverse effects* are identified and a line's minority or low-income population is higher than the TriMet District as a whole, the proposed change is flagged as a potential Disparate Impact or Disproportionate Burden, respectively. Figure 4 displays the minority population along each line as compared to the 27% TriMet District minority population. Figure 5 displays the low-income population along each line as compared to the 22% TriMet District low-income population. The narrative analysis of each individual line's proposed reduction follows.



Line 36 (Route streamlining, including stop removals)

The re-route to the Line 36 to improve travel times and operational efficiency would remove service from a total of 25 stops, including both directions of service. Only two of these stops would still have service within one-quarter mile, meaning that this is considered an *adverse effect* related to the removal of the other 23 stops. However, at 14% people of color and 15% low-income, the impacted area of the Line 36 – the block groups where service would be discontinued – has minority and low-income populations that are below-average for the TriMet district. At the line level, this leads to findings of ***no Disparate Impact*** and ***no Disproportionate Burden***.

It should also be noted that these stops see very little activity, with a total of 26 ons/offers per weekday, or an average of about one on/off per stop per day as of fall 2015.

Line 83 (Merge with Line 63)

Line 83, which provides weekend service in Washington Park from May through October, is proposed to be discontinued, with service hours reinvested into the nearly-identical Line 63. This would enable TriMet to provide year-round weekend service in Washington Park, while saving resources to invest elsewhere in the system. The proposal would remove TriMet service from four stops in the park. Each of these stops will be served by the free Washington Park TMA shuttle, and three of the four are less than one-quarter mile from TriMet Line 63 service. However, the fourth is one-third mile away from TriMet service, which constitutes its removal as an *adverse effect*.

The impacted area of the Line 83 is 14% minority and 11% low-income, which are below-average for the TriMet district. At the line level, this leads to findings of ***no Disparate Impact*** and ***no Disproportionate Burden***.

3. Major Service Increases

For service increases the analysis examines the extent to which the *benefits* of the improvements are inclusive of minority and low-income populations. The narrative analysis of each individual line is below. On the next page Figure 6 displays the minority population along each line as compared to the 27% TriMet District minority population, and Figure 7 displays the low-income population along each line as compared to the 22% TriMet District low-income population.

Line 20 (Frequency increase on Sundays)

Increasing Sunday service on the Line 20 to match what is currently provided on Saturdays would potentially benefit a service area population that is 32% minority and 32% low-income, which are both above-average compared to the TriMet district as a whole. At the line level, this leads to a finding of ***no Disparate Impact*** and ***no Disproportionate Burden***.

Line 21 (Frequency increase on weekdays)

Increasing weekday peak frequency on the Line 21 would potentially benefit a service area population that is 39% minority and 36% low-income, which are both above-average compared to the TriMet district as a whole. At the line level, this leads to a finding of ***no Disparate Impact*** and ***no Disproportionate Burden***.

Line 63 (New weekend service)

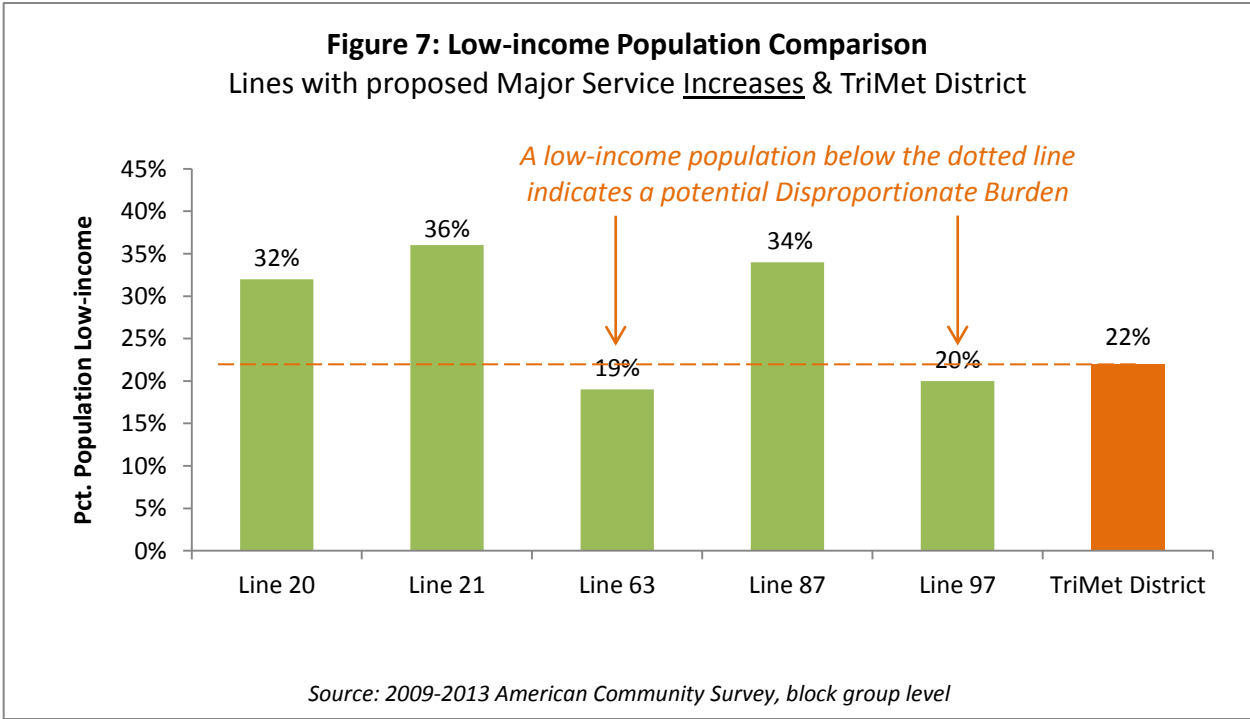
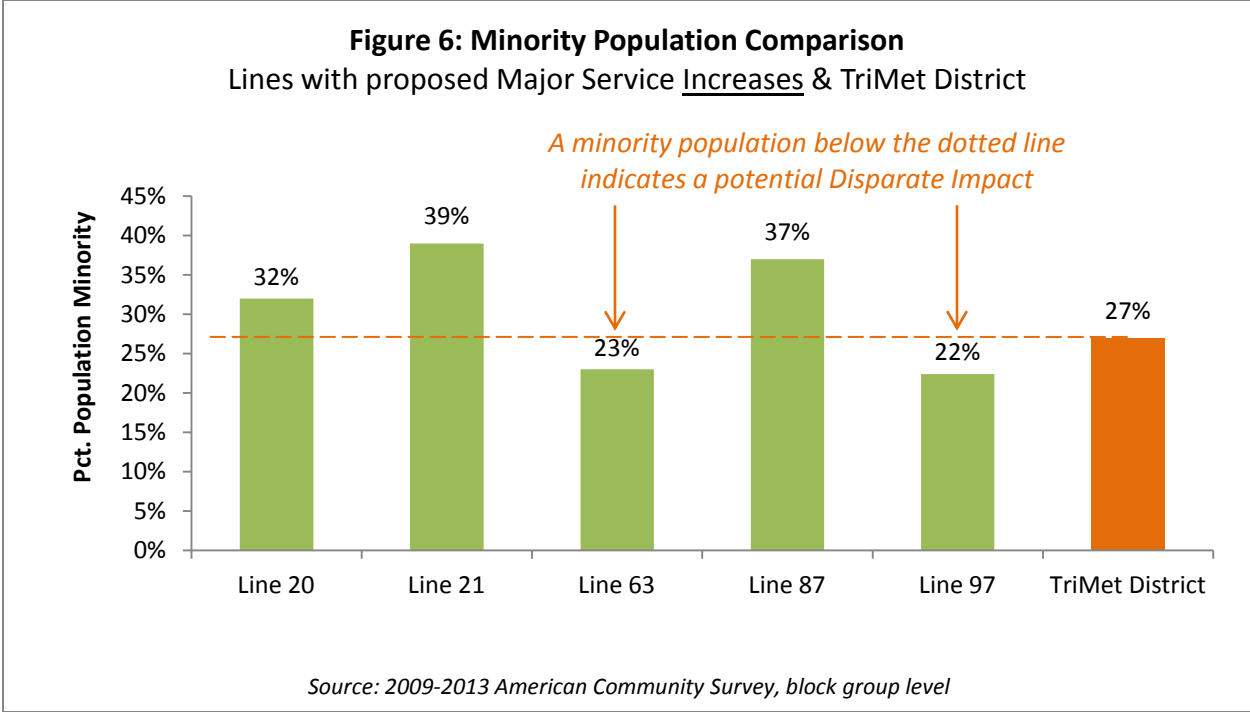
The discontinuation of the Line 83 would enable TriMet to expand service on the Line 63 by adding year-round weekend service (Note: the Line 83 currently provides weekend service only from May through October). The service area population of the Line 63 is 23% minority and 19% low-income, which are below-average for the TriMet district. At the line level, this indicates a ***potential Disparate Impact*** and a ***potential Disproportionate Burden***, calling for further examination of the context, goals, and alternatives considered. The system-level analysis provided in the next section is also a key consideration.

Line 87 (Frequency increase)

The service increase on the Line 87 would potentially benefit a service area population that is 37% minority and 34% low-income, which are both above-average compared to the TriMet District as a whole. At the line level, this leads to a finding of ***no Disparate Impact*** and ***no Disproportionate Burden***.

Line 97 (New line)

The new Line 97 would potentially benefit a service area population that is 22% minority and 20% low-income, which are below-average compared to the TriMet District. At the line level, this indicates a ***potential Disparate Impact*** and a ***potential Disproportionate Burden***, calling for further examination of the context, goals, and alternatives considered. The system-level analysis provided in the next section is also a key consideration.



D. System-level Analysis

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

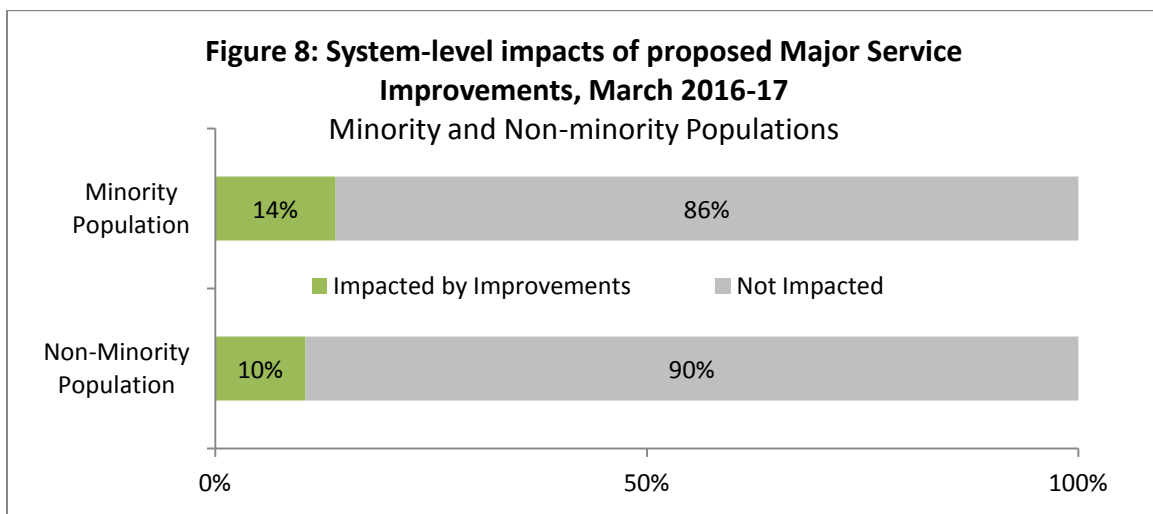
Disparate Impact Analysis: Major Service Increases

The system-level Disparate Impact analysis of Major Service Increases is completed by determining what portion of the TriMet District’s minority population stands to benefit from the Major Service Change improvements, and comparing that to the portion of the District’s non-minority population that potentially benefits. A potential Disparate Impact would exist if 20% less (or 4/5) of the District’s minority than non-minority population stood to benefit from the improvements, per TriMet’s adopted Title VI policies.

Table 4 and Figure 8 compare the positively impacted minority and non-minority populations. A greater percentage of the District’s minority population stands to benefit from the proposed Major Service Increases as compared to the non-minority population (14% vs. 10%, respectively). Given the 10% of non-minorities positively impacted by the improvements, the percentage of minorities impacted would have to be below 4/5 of that figure (or 8%) to meet the definition of a system-level Disparate Impact. Therefore, ***no system-level Disparate Impact is found related to proposed Major Service Increases.***

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

Pct. of TriMet District Non-Minority Pop Impacted	Minority Pop Disparate Impact Threshold	Pct. of TriMet District Minority Pop Impacted	Potential Disparate Impact?
10%	Less than 8%	14%	No



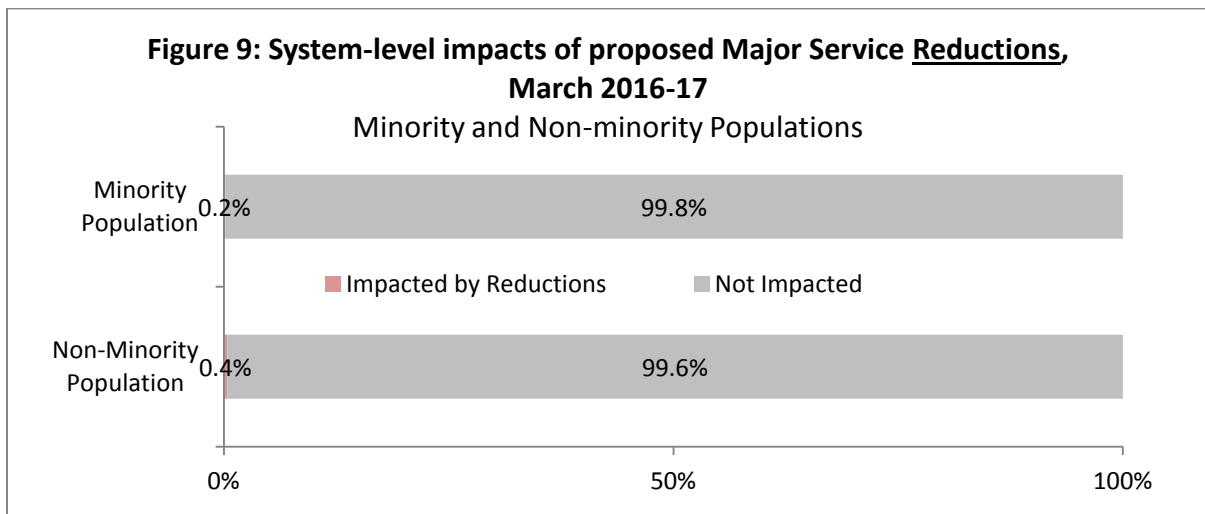
Disparate Impact Analysis: Major Service Reductions

The system-level Disparate Impact analysis of Major Service Reductions is completed by determining what proportion of the TriMet District’s minority population is potentially adversely impacted from the service reductions and comparing that to the District’s non-minority population that may be adversely impacted. A potential Disparate Impact would exist if 20% more of the District’s minority than non-minority population was impacted by the service reductions, per TriMet’s adopted Title VI policies.

Table 5 and Figure 9 compare the impacted minority and non-minority populations. In both cases, the percentage of the population impacted is less than 1%. A slightly greater percentage of the District’s non-minority population is potentially impacted by the proposed Major Service Reductions as compared to the minority population (0.4% vs. 0.2%, respectively). Given the 0.4% of non-minorities impacted by the reductions, the percentage of minorities impacted would have to be over 20% greater than that figure (or 0.48%) to meet the definition of a system-level Disparate Impact. Therefore, ***no system-level Disparate Impact is found related to proposed Major Service Reductions.***

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

Pct. of TriMet District Non-Minority Pop Impacted	Minority Pop Disparate Impact Threshold	Pct. of TriMet District Minority Pop Impacted	Potential Disparate Impact?
0.4%	Greater than 0.48%	0.2%	No



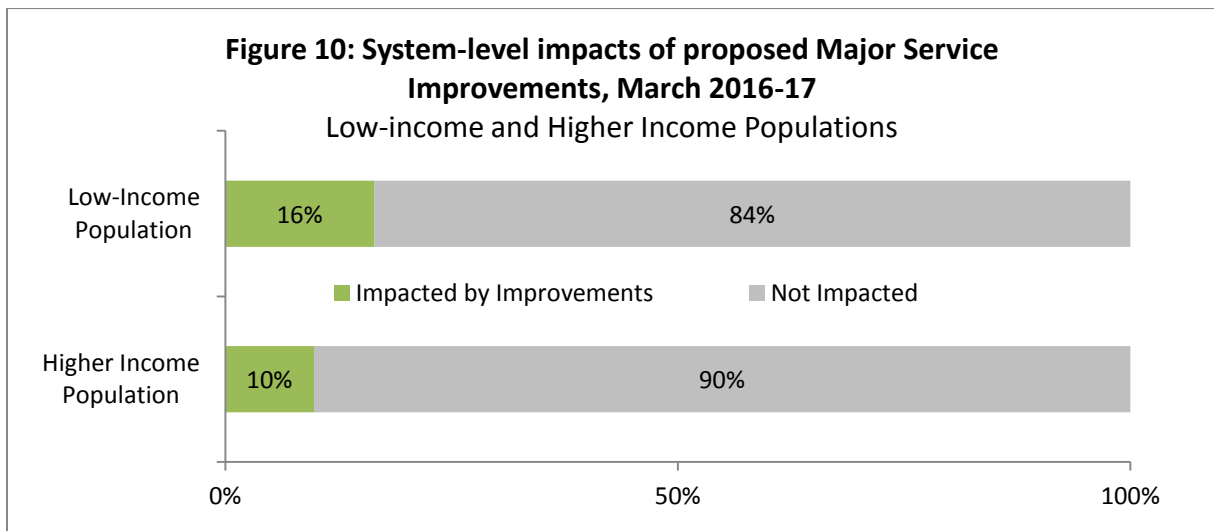
Disproportionate Burden Analysis: Major Service Increases

The system-level Disproportionate Burden analysis is completed by determining what proportion of the TriMet District’s low-income population is positively impacted by the Major Service Change improvements, and comparing that to the District’s higher income population that is positively impacted. “Higher income” includes all persons above the low-income threshold of 150% of the federal poverty level. A potential Disproportionate Burden would exist if 20% less (or 4/5) of the District’s low-income than higher income population stood to benefit from the improvements, per TriMet’s adopted Title VI policies.

Table 5 and Figure 5 compare the impacted low-income and higher income populations. A greater percentage of the District’s low-income population stands to benefit from the proposed Major Service Change improvements as compared to the higher income population (16% vs. 10%, respectively). Given the 10% of higher income persons positively impacted by the set of Major Service Changes, the percentage of low-income persons impacted would have to be below 4/5 of that figure (or 8%) to meet the definition of a system-level Disproportionate Burden. Therefore, ***no system-level Disproportionate Burden is found related to proposed Major Service Increases.***

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

Pct. of TriMet District Higher Income Pop Positively Impacted	Low-income Pop Disproportionate Burden Threshold	Pct. of TriMet District Low-income Pop Impacted	Potential Disproportionate Burden?
10%	Less than 8%	16%	No



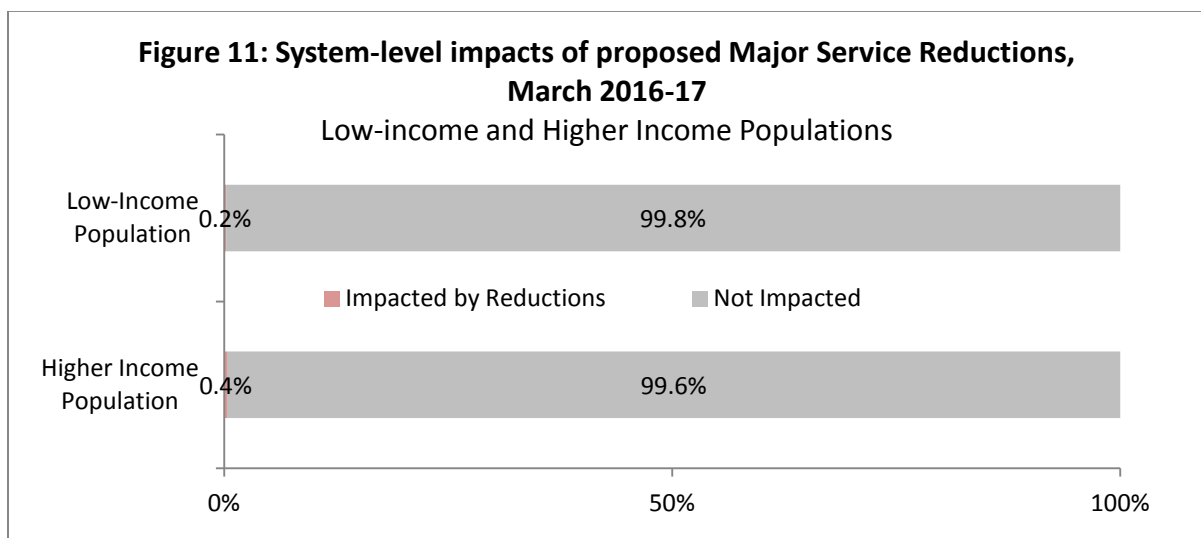
Disproportionate Burden Analysis: Major Service Reductions

The system-level Disproportionate Burden analysis is completed by determining what proportion of the TriMet District’s low-income population is potentially adversely impacted from the service reductions and comparing that to the District’s higher income population that may be adversely impacted. “Higher income” includes all persons above the low-income threshold of 150% of the federal poverty level. A potential Disproportionate Burden would exist if 20% more of the District’s low-income than higher income population was impacted by the service reductions, per TriMet’s adopted Title VI policies.

Table 7 and Figure 11 compare the impacted minority and non-minority populations. In both cases, the percentage of the population impacted is less than 1%. A slightly greater percentage of the District’s higher income population is potentially impacted by the proposed Major Service Reductions as compared to the low-income population (0.4% vs. 0.2%, respectively). Given the 0.4% of higher income population impacted by the reductions, the percentage of the low-income population impacted would have to be over 20% greater than that figure (or 0.48%) to meet the definition of a system-level Disproportionate Burden. Therefore, ***no system-level Disproportionate Burden is found related to proposed Major Service Reductions.***

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

Pct. of TriMet District Higher Income Pop Positively Impacted	Low-income Pop Disproportionate Burden Threshold	Pct. of TriMet District Low-income Pop Impacted	Potential Disproportionate Burden?
0.4%	Greater than 0.48%	0.2%	No



IV. Public Outreach

The service proposals analyzed in this report stem from a multi-year planning and outreach process to develop a vision for future transit service in the Portland metropolitan region. Divided by sub-region of the TriMet service district, these “Service Enhancement Plans” were undertaken to identify and prioritize opportunities to improve bus service as well as pedestrian and bike access to transit, given current and projected population and job growth. The plans include dozens of bus service improvements beyond those proposed for implementation over the next year.³

TriMet also engaged the public with the specifics of these service proposals in February 2016. The agency received comments via email, targeted community and onboard outreach, and a public open house. Input was largely positive about proposed changes and TriMet’s efforts to invest in additional bus service. Both those who emailed and those who attended the open house had suggestions for additional improvements throughout the TriMet service district, which were directed to planning staff.

The proposed route change to the Line 36 (which includes several stop removals) did raise concerns for some. In order to hear from potentially impacted community members about this change, staff presented the proposal at a meeting of the Rosewood Neighborhood Association board. Attendees expressed a desire to maintain service in the Rivergrove area, especially for the few people who have no other options and would need to walk much farther to continue riding (summary of discussion provided as Appendix B). However, TriMet intends to pursue the route change because ridership on this portion of the line has been very low for many years – even when TriMet offered 12 more trips than today. The new route has the potential to attract more riders by serving more employment, having shorter travel time, and improving reliability. To reiterate the finding of the data analysis, the proposed change does not present any apparent Title VI-related concerns.

³ For more information, go to <http://future.trimet.org>

V. Summary & Discussion

Table 8 summarizes the results of the line-level and system-level Disparate Impact and Disproportionate Burden analyses.

Table 8: Summary of Disparate Impact and Disproportionate Burden analysis results

	Potential Disparate Impact?	Potential Disproportionate Burden?
Route Split		
71-60 th /122 nd Ave	No	No
Service Reductions		
36-South Shore	No	No
83-Washington Park Loop	No	No
Combined Reductions (System-level)	No	No
Service Improvements		
20-Burnside/Stark	No	No
21-Sandy Blvd/223 rd	No	No
63-Washington Park	Yes	Yes
87-Airport Way/181 st	No	No
97-Tualatin-Sherwood Rd	Yes	Yes
Combined Improvements (System-level)	No	No

The two service proposals flagged for potential Disparate Impact and Disproportionate Burden – Lines 63 and the new Line 97 – are improvements in areas with below-average minority and low-income populations. However, the rest of the proposed improvements serve areas of above-average minority and low-income populations, thereby countering concerns about an inequitable distribution of benefits related to the package of proposed service changes. Even so, the context of the Line 63 and Line 97 help explain why TriMet is proposing these improvements despite the below-average minority and low-income populations along the route.

The addition of weekend service on the Line 63 is possible due to the removal of the seasonal Line 83, which is providing redundant service now that the Washington Park TMA has introduced the free Washington Park shuttle serving the same route and funded by parking revenues within Washington Park. The 63 serves largely the same route, but also serves the nearby Arlington Heights neighborhood. Reinvesting the savings from Line 83 elimination into year-round weekend service in the area utilizes existing resources without reducing service

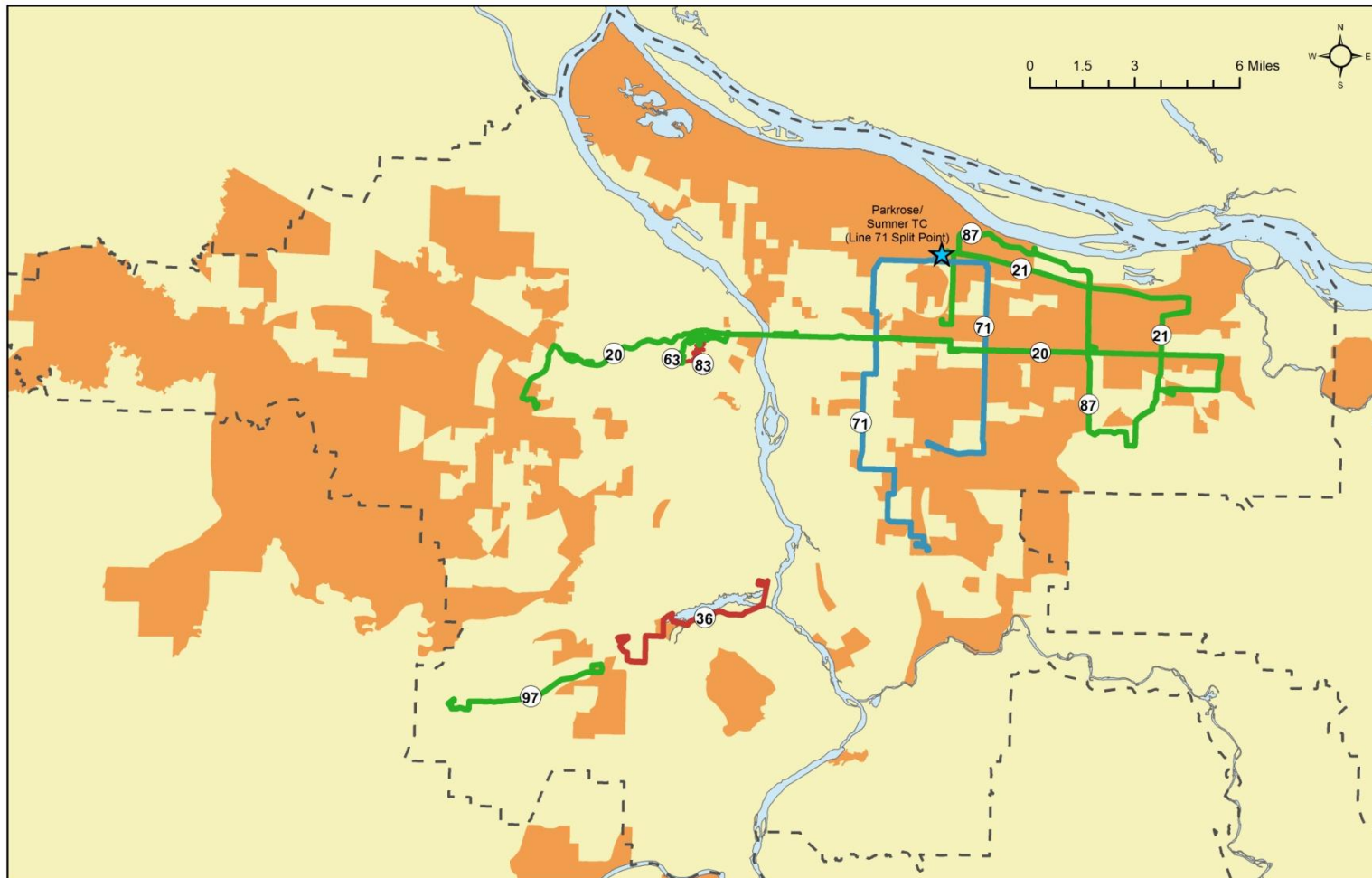
elsewhere and results in a net savings of vehicle hours that is going into some of the other improvements proposed.

Regarding the new Line 97, service on Tualatin-Sherwood Rd. was identified after significant community outreach to the southwest portion of the TriMet service District (where the communities of Tualatin and Sherwood are located), as part of TriMet's Future of Transit planning efforts. This outreach included stakeholder meetings, community workshops, and specific outreach to communities of concern. Line 97 will serve an area that currently lacks TriMet service, yet has over 20,000 jobs, many of which are entry level. The line will provide a vital connection to WES Commuter Rail Service to Beaverton, Tigard, and Wilsonville, Line 96 express service to downtown Portland, and Line 76, a future Frequent Service Line. And service on Tualatin-Sherwood Rd. is the first step towards creating a longer line that will stretch north of downtown Tualatin to serve the many jobs at Bridgeport Village, the SW 72nd Ave. corridor, the Tigard Triangle, and downtown Tigard.

One final note is that two proposed service improvements, while not reaching the threshold of Major Service Changes, stand out as significant: Line 71-122nd Ave portion (23% increase in service hours), and the Lines 76 and 78 on Sundays (21% and 22% increase in service hours, respectively). All three of these lines serve above-average minority and low-income populations, and the Line 71 improvement responds directly to recommendations from by several East Portland community organizations as well as TriMet's Transit Equity Advisory Committee for better north-south service in that area of the region.

Thus, given the results of this analysis and the context of the proposed service changes, the investments in service proposed to roll out over the next year appear to benefit minority and low-income populations equitably, without any apparent disproportionate and adverse impacts.

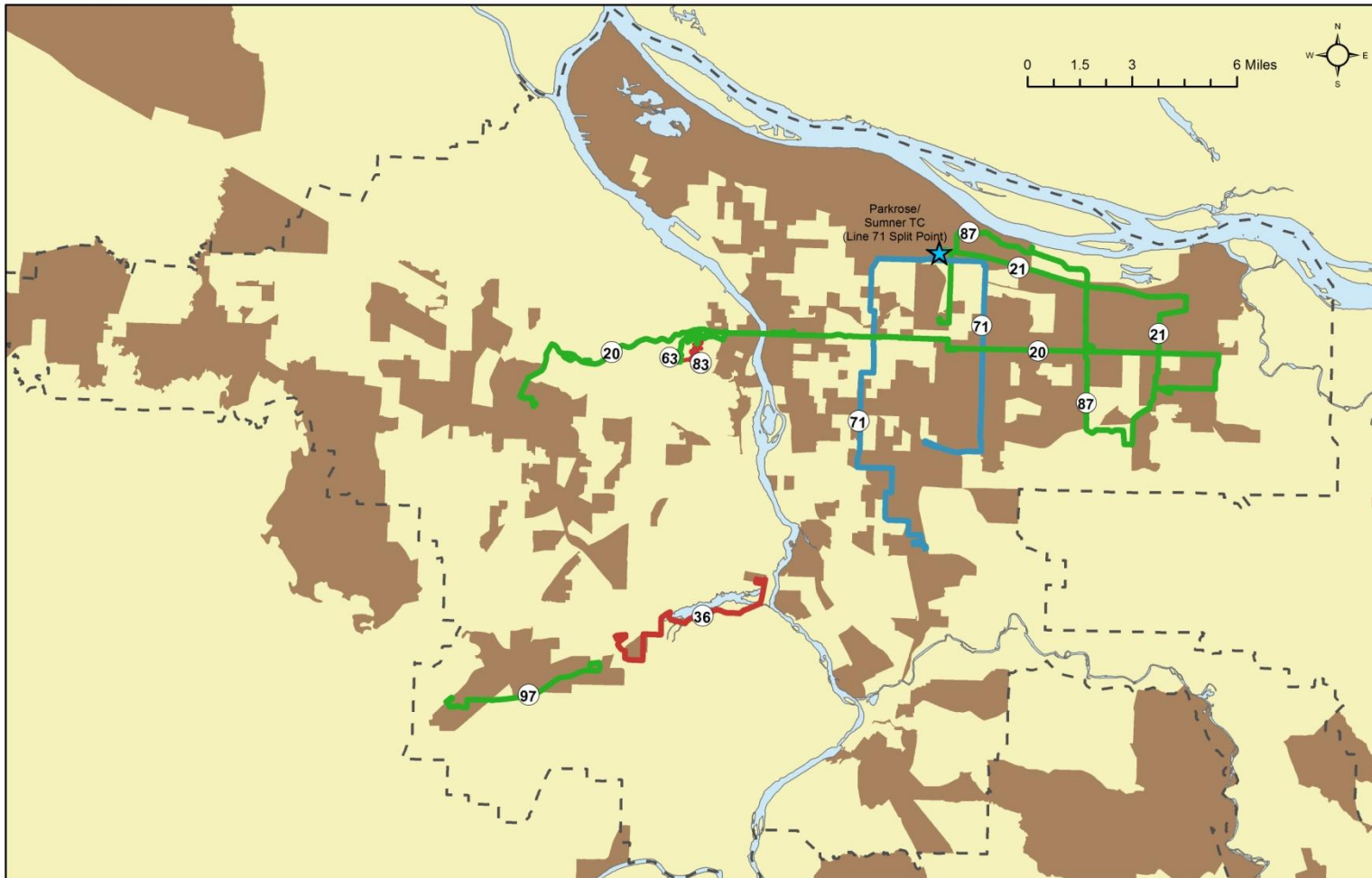
Appendix A: Overlay Maps showing proposed Major Service Changes and demographics



Proposed Major Service Changes & Minority Population March 2016 - March 2017

Source: 2009-2013 American Community Survey





Proposed Major Service Changes & Low-income Population March 2016 - March 2017

Source: 2009-2013 American Community Survey



Appendix B: Summary of discussion with Rosewood Neighborhood Association regarding proposed route change to Line 36-South Shore

Discussion of the Line 36-Southshore Blvd. Route Change Proposal – Rosewood Neighborhood Association Board Meeting

7:00 p.m. to 8 p.m. February 18, 2016

River Grove Elementary School

Attendees: 18 + 5 Rosewood NA Board Members; 23 total

Comments:

1. Proposal would result in a long walk for riders – especially from Rivergrove.
2. Concern about the businesses on McEwan Rd.
3. One of the motels on McEwan Rd. is for long-term housing for homeless people.
4. The Boones Ferry Rd. intersection is too big to cross. Vehicles move too quickly through it.
5. Line 36 provides access to the neighborhood. It is the only means of transportation for some.
6. One person takes the bus to work at OHSU every day. Can't drive to work because of limited parking at OHSU.
7. Tualatin P&R is not a good option for some people. It is sometimes full. P&R's are subject to crime. On cold evenings, one's car may not start at the P&R.
8. Walking to the Tualatin P&R is not a good option. The walk is long and unpleasant.
9. Would like to take Line 36 to PCC.
10. The bus doesn't run frequently enough, early enough, or late enough.
11. Want weekend service on Line 36.
12. What about routing Line 36 down Lakeview Rd. to get closer to Micro Systems/Biotronik. It may increase rides.
13. Improve connectivity with other bus lines.
14. There must be a middle ground. Look at data better. Find efficiencies elsewhere.
15. Public transportation makes life better for this community.
16. This proposal would make our trips longer.
17. Pull out some of the stops so the bus can serve the community, but do it faster.
18. There is a yard helper who comes to the neighborhood to work on one or more properties up to 5 days/week in the summer. Line 36 is his only means to work.
19. Rivergrove is growing (30%, doubling), especially in the last couple of years. Much of the growth is along Childs Rd. Transit is what makes Rivergrove attractive.
20. A lot of people would rather go to the Tualatin P&R and connect with Line 96 than through downtown LO. The schedule doesn't make it convenient to do this during rush hour.
21. Many in the community pay the TriMet payroll tax. Many feel even if they don't pay the tax directly, they pay the tax indirectly via increased prices.
22. Serve Childs Rd. to Bryant Rd. More ridership potential.
23. How many people are a ¼ mile from the existing line?
24. Pop. in Rivergrove has grown from 275 to 595 people.
25. There is a real community on the bus.
26. The current schedule is not realistic. That is why ridership is low.
27. Start the bus earlier in the morning.
28. Historically, communities have formed around transit. Transit has helped communities grow. This proposal would hurt this community.
29. This is a mixed income community. Consider Piper's Run apartments.
30. River Grove Elementary is the only Title X elementary school in the LO School District.

Date: April 27, 2016
To: Board of Directors
From: Neil McFarlane *Neil McFarlane*

Subject: **ORDINANCE NO. 343 OF THE TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET) ADOPTING SERVICE CHANGES, UPDATING ROUTE DESIGNATIONS, AND AMENDING TRIMET CODE CHAPTER 22 (SECOND READING)**

1. Issue or Purpose of Item

The purpose of Ordinance No. 343 is to request that the TriMet Board of Directors (“Board”) adopt service changes and update route designations contained in TriMet Code Chapter 22.

2. Type of Agenda Item

- Initial Contract
- Contract Modification
- Other: Ordinance

3. Reason for Board Action

The Board may adopt service changes and update TriMet Code route designations by ordinance. The TriMet Code may be amended only by adoption of an ordinance.

4. Type of Action:

- Resolution
- Ordinance 1st Reading
- Ordinance 2nd Reading
- Other _____

5. Background

Ordinance No. 343 adopts service changes and updates route designations set forth in TriMet Code Chapter 22. The proposed service changes originate from the District’s Service Enhancement Plan (SEP) process addressing the agency’s 20-year vision for bus service improvements within the TriMet district.

A. Proposed Service Changes:

Ordinance No. 343 includes bus service changes for fiscal years 2016 and 2017. In March 2016, bus service improvements provide additional earlier and/or later trips, midday service, route extension, and additional Sunday service. In June 2016, one bus line will be discontinued as service will be replaced by the Explore Washington Park Shuttle during the summer months, and a new bus line of the District will be added between Tualatin and Sherwood.

For FY17, specifically September 2016, the line 71-60th/122nd Ave will be broken into two separate bus lines at Parkrose Transit Center. One line will continue to run between Parkrose and Clackamas Town Center. The second will run on 122nd Avenue and will be renumbered and renamed and have additional weekday rush hour service. Two bus lines will have additional hours of weekday service, one bus line will have weekend service added, and one bus route will be modified. In Spring 2017, two lines will have increased weekday frequency, one line will have additional Sunday service, and one line will extend an additional 10 blocks to serve a new development.

The complete list of proposed Ordinance No. 343 service changes are set forth in Exhibit A and summarized below:

- Earlier and/or later bus trips on 5 bus lines
- Bus service realignment and/or more frequency on 9 bus lines
- Discontinuation of one bus line in Washington Park (seasonal service only)
- Weekend service added in Washington Park and surrounding areas in response to the discontinuation of TriMet seasonal service to the Park
- Addition of one new bus line between Tualatin and Sherwood
- Improvements on a handful of busy lines to relieve overcrowding and improve schedule reliability
- Changes recommended in the Service Enhancement Plans to address growth in jobs and development.

B. Service Change Public Process:

The proposed Ordinance No. 343 service changes are the result of numerous conversations and meetings with jurisdictions, businesses, community leaders, passengers and other interested parties over the past 18-24 months as part of the SEP process. In addition to outreach activities conducted by TriMet service planners, advertisements regarding the proposed service changes were placed in newspapers across the district, and TriMet's website solicited feedback about the proposed service changes. On February 25, 2016, an Open House and Public Hearing were held at Mount Hood Community College, Parkrose campus to provide information and solicit public comment on the proposed service changes. Approximately 20 people attended the Open House and Public Hearing and provided feedback.

TriMet staff also held a public meeting on February 18th at the Rivergrove Elementary School to answer questions and address concerns about the proposed Line 36-Southshore route change. The meeting and proposal were advertised via letter to all addresses within ¼ mile of the route and bus stop postings along Line 36-Southshore Blvd. Twenty-two people attended the meeting. Rivergrove and Lake Oswego residents also submitted comments through letters, emails, and phone calls.

In addition, public comment on the proposed service changes is accepted by phone, email and standard mail. A summary of comments received via these venues was provided to the Board prior to the March 23, 2016 Board meeting. A summary of comments received since the March 23, 2016 meeting will be provided to the Board prior to the April 27, 2016 Board meeting.

Public testimony may also be provided during Public Forum at the April 27, 2016 Board meeting.

C. Title VI Transit Equity Analysis:

In accordance with Federal Transit Administration (FTA) Title VI Circular 4702.1B implementing Title VI of the Civil Rights Act, major service changes must be analyzed to identify potential disproportionate impacts to minority and low-income populations. Ordinance No. 343 service changes proposed for March and June 2016 and FY2017 include eight major service changes.

TriMet staff prepared a Title VI service equity analysis ("Report"), which evaluated potential adverse effects and benefits associated with the proposed major service changes. To summarize, the Report finds no disparate impact on minority populations and no disproportionate burden on low-income populations. Minority and low-income populations stand to benefit as much or more than others from service improvements, and are not disproportionately impacted by the few service reductions proposed.

The results and findings of the Title VI service equity analysis were presented to the Board for their consideration at their March 9, 2016 briefing. The final Report was provided to the Board prior to their March 23, 2016 Board meeting.

D. Updates to TriMet Code Chapter 22:

In addition to adoption of the proposed service changes, Ordinance No. 343 adopts updates to route designations set forth in TriMet Code Chapter 22 as set forth in Exhibit A.

6. Financial/Budget Impact

The proposed Ordinance No. 343 service changes will result in a FY 2017 budget impact of approximately \$5.7 million, largely paid for by revenues generated through the 2016 payroll tax increase.

7. Impact if Not Approved

The Board may choose to not conduct a second reading and not adopt Ordinance No. 343 at its April 27, 2016 Board meeting. However, this option is not recommended. The proposed Ordinance No. 343 service changes are needed to enable the agency to continue to serve the growing region, provide for expanded transit service, maintain service capacity and reliability, and make investments to help advance future planned service improvements.

ORDINANCE NO. 343

**AN ORDINANCE OF THE TRI-COUNTY METROPOLITAN
TRANSPORTATION DISTRICT OF OREGON (TRIMET) ADOPTING
SERVICE CHANGES, UPDATING ROUTE DESIGNATIONS, AND AMENDING
TRIMET CODE CHAPTER 22**

THE BOARD OF DIRECTORS OF THE TRI-COUNTY METROPOLITAN TRANSPORTATION DISTRICT OF OREGON (TRIMET), pursuant to the authority of Oregon Revised Statutes Chapter 267, having considered the transit equity service change analysis final Report, does hereby ordain and decree the following Ordinance:

Section 1 - Adoption of Service Changes

Service Changes are adopted as set forth on the attached Exhibit A, which is incorporated into and made part of this Ordinance. In accordance with TriMet Code Section 22.05, new Schedule Notices shall be filed for affected lines.

Section 2 - Amendment of TriMet Code Chapter 22

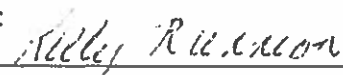
TriMet Code Section 22.05 is amended to make the Route Designation updates set forth on the attached Exhibit A.

Section 3 - Effective/Operative Dates

This Ordinance shall take effect thirty days after the date of its adoption. Operative dates for specific Service Changes and Route Designation updates shall be as designated on Exhibit A.

Date Adopted: April 27, 2016


Presiding Officer

Attest: 
Recording Secretary

Approved as to Legal Sufficiency:


Legal Department

**ORDINANCE NO. 343
EXHIBIT A**

Service Changes and TriMet Code Chapter 22 Route Designation Updates

Service Changes are adopted and TriMet Code Chapter 22 Route Designations are updated as set forth below:

Section 1 - Service Changes

Affected Lines	Description
	<i>Operative March 6, 2016</i>
12-Barbur/Sandy Blvd	Trips added late night and early morning weekdays to and from Tigard
57-TV Hwy/Forest Grove	Trips added late night and early morning weekdays
87-Airport Way/181 st Ave	Trips added midday weekdays between 182 nd /Powell and Gateway Transit Center
75-Chavez/Lombard	Extend all weekday evening trips to downtown Milwaukie
72-Killingsworth/82 nd Ave	Trips added early morning.
76-Beaverton/Tualatin	Earlier and later trips added on Sundays
78-Beaverton/Lake Oswego	Trips added on Saturdays and Sundays
	<i>Operative June 5, 2016</i>
83-Washington Park Loop	Discontinue service. Service will be replaced by the Explore Washington Park Shuttle during the summer months.
97-Tualatin-Sherwood Rd.	New weekday bus line between Tualatin and Sherwood along Tualatin-Sherwood Rd.
	<i>Operative September 4, 2016</i>
4-Division/Fessenden	Trips added late night and early morning weekdays
32-Oatfield	Trips added in morning and evening weekdays
36-South Shore	Changes to the end of the route to stay on Jean Road to Boones Ferry Road. Discontinue service on Pilkington Road, Childs Road, 65th Avenue and McEwan.
63-Washington Park	Add weekend service (service expansion as part of replacement of line 83 summer weekend service)
71-60 th /122 nd Ave	Split into two separate bus lines. One line will continue to run on its current route and frequency along 60 th Avenue between Parkrose Transit Center and Clackamas Town Center and be called 71-60 th Ave. The other line will run on 122 nd Ave. and will be numbered 73-122 nd Ave with additional weekday rush hour trips.

	<i>Operative Spring, 2017</i>
20-Burnside/Stark	Trips added weekdays and Sundays
21-Sandy Blvd/223 rd Ave	Trips added weekdays.
155-Sunnyside Rd	Extend route to new development at 172 nd Avenue

Section 2 -Route Designation Revisions to TriMet Code Chapter 22, Section 22.05

Operative June 5, 2016:

Delete “83-Washington Park Loop”

Add “97-Tualatin-Sherwood Rd”

Operative September 4, 2016:

Revise “71-60th/122nd Ave” to “71-60th Ave”

Add “73-122nd Ave”

Resolution 16-04-24 Authorizing a Contract with David Evans and Associates, Inc. for Rail Pedestrian Safety Enhancement Design Services

Action: Travis Stovall moved approval of Resolution 16-04-24; Lori Irish Bauman seconded the motion. The motion was unanimously approved.

Resolution 16-04-25 Authorizing a Contract with Raimore Construction, LLC for Construction Manager/General Contractor Services for the Portland-Milwaukie Light Rail Deferred Shelters Installation Project

Action: Travis Stovall moved approval of Resolution 16-04-25; Joe Esmonde seconded the motion. The motion was unanimously approved.

6. Ordinance 343 An Ordinance of the Tri-County Metropolitan Transportation District of Oregon (TriMet) Adopting Service Changes, Updating Route Designations, and Amending TriMet Code Chapter 22 (Second Reading)

General Counsel Shelley Devine read Ordinance 343 by title only.

Neil McFarlane stated that today's ordinance outlines the service changes we plan on making in accordance with the proposed budget. At the March 23, 2016 Board meeting, we went over our public outreach and the comments we received from the public. Since then, we have received no further comments. Most of the service changes are expanding service, with one "reduction" on line 36 which we noted previously.

Vice President Bethel stated that the Board has seen the outreach that has been done to the potentially affected communities of these policy changes and have seen and heard from community members through various commenting channels including last month's public hearing. The Board has also seen the Equity Analysis that was done and approved its findings at our March 23, 2016 meeting. With no questions or discussions, Vice President Bethel asked Shelley Devine to proceed with the roll call vote:

Action: Lori Irish Bauman moved approval of Ordinance 343; Travis Stovall seconded the motion.

The following roll call vote resulted in the approval of Ordinance 343:

Joe Esmonde.....	Yes
T. Allen Bethel.....	Yes
Travis Stovall.....	Yes
Lori Irish Bauman.....	Yes

Attachment O

TRIMET SERVICE GUIDELINES POLICY

Resolution 14-12-60

Exhibit A

TriMet Service Guidelines Policy

Policy Statement

TriMet's mission is to provide valued transit service that is safe, dependable, and easy to use. Each year in service of this mission, TriMet develops an Annual Service Plan that provides for managing service, expands service when financially sustainable, and reduces service when necessary.

By adopting a Service Guidelines Policy, the TriMet Board of Directors ("Board") provides policy and strategic direction to the General Manager on the priority considerations that drive service planning decisions in how it identifies and executes service changes, and will be addressed in each year's Annual Service Plan. To implement this policy direction, the General Manager will approve a TriMet Service Guidelines Framework document once public comment is compiled.

Reporting

- The Annual Service Plan will be published each year and should include the five priority considerations adopted in these Service Guidelines.
- The General Manager should direct staff to refine tools and approaches to better understanding and communicating effectiveness regarding the five priority considerations for service planning, and update a detailed Service Guidelines Framework document as needed to most effectively address the five priority considerations.

Service Guidelines

The TriMet Board hereby adopts the following five priority considerations to provide the framework for service planning decision-making:

- **Equity** - TriMet's services and business opportunities are open to everyone in our community. TriMet operates with fairness and equity for all. TriMet complies with Title VI of the Civil Rights Act, and also strives to ensure that the decisions of where and when to serve are made through an equity lens, considering the needs of low-income populations, people of color, people with disabilities, and other communities of concern. Equity is a lens through which the other following considerations should be considered.
- **Demand** - Service should respond to changes in demand for mobility and access via transit.
- **Productivity** – Productivity (measured in boarding rides per vehicle hour) measures the cost-effectiveness of the service provided. Productivity should be understood in the context of the need to provide service across the district as well as challenges such as last-mile connections or partnering with other agencies or service providers to meet the needs of specific areas with comparatively lower demand.
- **Connections** - Connections to jobs, to school, and other high priority places for communities. These can include key locations such as job centers, schools, colleges, training centers, and neighborhood housing.
- **Growth** – Growth in population and employment in various parts of the region should help inform service decisions and service should support the needs of this growth.

Attachment P

DATA FROM 2016 ON-BOARD FARE SURVEY

Trip Characteristics and Demographics for Race/Ethnicity and 150% Federal Poverty Level

2016 Fare Survey

Weekday - Bus, MAX, WES

Weighted to originating rides

Cells may not add to 100% due to rounding

Shaded cells: Significantly higher at the 95% confidence level

	Race/Ethnicity		150% FPL	
	Non-minority 63% n=4,445	Minority 37% n=2,640	Above 58% n=3,201	At / Below 42% n=2,338
Route where survey was distributed - group 1				
Net: Bus	59%	63%	54%	62%
Frequent Service bus	29%	31%	27%	31%
All other bus	30%	32%	27%	31%
MAX	41%	37%	45%	37%
WES	0%	0%	1%	0%
Total	100%	100%	100%	100%
Route where survey was distributed - group 2				
MAX	41%	37%	45%	37%
Radial bus	37%	34%	37%	34%
Crosstown bus	16%	21%	12%	21%
Westside feeder bus	4%	6%	4%	5%
Eastside feeder bus	2%	2%	2%	3%
WES	0%	0%	1%	0%
Total	100%	100%	100%	100%
Time period when survey was distributed				
Early AM (before 6 am)	4%	4%	6%	3%
Peak (6-9 am, 3-6 pm)	31%	27%	36%	23%
Midday (6 am-3 pm)	47%	51%	42%	55%
Evening/night (after 6 pm)	18%	18%	17%	19%
Total	100%	100%	100%	100%
Language of survey				
English	100%	96%	100%	99%
Spanish	0%	4%	0%	1%
Total	100%	100%	100%	100%
1. Do you have to transfer to or from a different line to make this trip in one direction?				
No	73%	69%	76%	67%
Yes, 1 time	24%	27%	21%	29%
Yes, 2 times or more	3%	4%	3%	4%
Total	100%	100%	100%	100%

	Race/Ethnicity		150% FPL	
	Non-minority 63% n=4,445	Minority 37% n=2,640	Above 58% n=3,201	At / Below 42% n=2,338
1. Do you have to transfer to or from a different line to make this trip in one direction? Grouped by Q2 vehicle transfer				
Transfer to Bus(s)	63%	56%	58%	63%
Transfer to MAX(s)	27%	35%	31%	28%
Other routes/combinations	5%	5%	6%	4%
Transfer to bus and MAX	5%	5%	5%	5%
Total	100%	100%	100%	100%
3. How many trips have you made on a TriMet bus or MAX or WES in the last week?				
Mean	9.5	9.7	8.8	10.8
3. How many trips have you made on a TriMet bus or MAX or WES in the last week? - multiplied by 4 weeks				
Infrequent (less than once/month)	3%	2%	3%	2%
Occasional (couple of times/month)	11%	12%	11%	9%
Regular (several times/week)	25%	26%	24%	24%
Frequent (almost every day)	62%	60%	61%	64%
Total	100%	100%	100%	100%
4. How did you pay your fare for this trip?				
TriMet fare	99%	98%	99%	98%
C-TRAN fare	1%	1%	1%	1%
Portland Streetcar fare	0%	1%	0%	1%
Total	100%	100%	100%	100%
5. Which TriMet fare do you have? (asked if TriMet fare)				
Adult	60%	55%	66%	57%
Youth	4%	14%	3%	8%
Honored Citizen	18%	12%	11%	23%
LIFT	0%	0%	0%	0%
Employer sticker	11%	6%	16%	2%
College sticker	4%	5%	3%	6%
PPS student sticker	3%	7%	2%	3%
HC Downtown Pass	0%	0%	0%	0%
Other	0%	0%	0%	0%
Total	100%	100%	100%	100%

Race/Ethnicity

150% FPL

	Non-minority 63% <i>n=4,445</i>	Minority 37% <i>n=2,640</i>	Above 58% <i>n=3,201</i>	At / Below 42% <i>n=2,338</i>
6. Did you purchase a.... (asked if TriMet fare Adult, Youth, HC, LIFT)				
Single 2-1/2 hour ticket	20%	23%	20%	23%
Book of 10 2-1/2 hour tickets	5%	3%	5%	2%
1-Day Pass	20%	21%	20%	24%
Book of 5 1-Day Passes	2%	2%	3%	1%
7-Day Pass	3%	2%	3%	2%
14-Day Pass	1%	2%	1%	2%
Monthly/30-Day Pass	29%	29%	26%	32%
Annual Pass (includes TriMet sticker: employee, college, high school)	19%	19%	22%	12%
Total	100%	100%	100%	100%
7. How many one-way trips will you make on your Day Pass today? (asked if purchased Day Pass/Book of Day Passes)				
<i>Mean</i>	2.6	2.6	2.5	2.7
8. Is your single-fare payment being used for a one-way or a round-trip? (asked if purchased single fare/book of 10 single fare)				
One-way trip (not single fare trip)	75%	74%	75%	74%
One-way trip (single fare trip)	19%	18%	20%	18%
Round-trip	6%	7%	5%	8%
Total	100%	100%	100%	100%
9. Where did you purchase or get your fare for this trip? (asked if TriMet fare Adult, Youth, HC, LIFT)				
TVM	16%	19%	17%	19%
On-board the vehicle	15%	18%	12%	21%
Work	19%	12%	27%	7%
Mobile Ticket App	19%	13%	22%	13%
School	10%	19%	6%	14%
Retail store	10%	9%	7%	12%
TTO	5%	4%	4%	5%
Social Service Agency	3%	4%	1%	6%
Online	2%	1%	2%	1%
Other	1%	2%	1%	1%
Total	100%	100%	100%	100%

	Race/Ethnicity		150% FPL	
	Non-minority 63% n=4,445	Minority 37% n=2,640	Above 58% n=3,201	At / Below 42% n=2,338
10. For all purchases, not just fares, which of the following do you use? (multiple response)				
Cash	56%	65%	48%	68%
Bank issued debit or credit card	52%	34%	61%	34%
Check or savings	23%	17%	23%	21%
Smart phone payment apps	9%	8%	11%	7%
Pre-paid debit or credit card	5%	6%	5%	5%
Pre-paid gift card	2%	1%	2%	1%
Money order or cashier's check	1%	1%	1%	1%
11. Are you a college student? (not included-Q12 school name)				
No	83%	75%	85%	74%
Yes, full time	12%	15%	10%	17%
Yes, part time	6%	9%	5%	9%
Total	100%	100%	100%	100%
13. Do you have a smart phone?				
Yes	84%	85%	90%	80%
No	15%	14%	10%	19%
Don't know	0%	1%	0%	1%
Total	100%	100%	100%	100%
14. Do you have access to the internet?				
Yes	94%	91%	97%	89%
No	6%	9%	3%	11%
Don't know	0%	1%	0%	1%
Total	100%	100%	100%	100%
15. What is your age?				
Less than 18	7%	18%	4%	9%
18-24	17%	24%	11%	26%
25-34	29%	25%	32%	29%
35-44	17%	14%	21%	15%
45-54	13%	9%	15%	10%
55-64	11%	6%	11%	8%
65 or more	7%	3%	6%	4%
Total	100%	100%	100%	100%

	Race/Ethnicity		150% FPL	
	Non-minority 63% n=4,445	Minority 37% n=2,640	Above 58% n=3,201	At / Below 42% n=2,338
16. What is your gender?				
Male	54%	52%	56%	51%
Female	45%	47%	43%	48%
Other	1%	1%	1%	2%
Total	100%	100%	100%	100%
17. Race/ethnicity - coded into 1 response				
Asian/Pacific Islander	-	19%	6%	7%
African American/Black	-	19%	5%	9%
Caucasian/White	100%	-	74%	56%
Hispanic/Latino	-	29%	6%	14%
Multi-racial/bi-racial	-	22%	7%	9%
Native American Indian	-	5%	1%	3%
Other	-	5%	1%	2%
Total	100%	100%	100%	100%
18. Do you have a disabling health condition?				
No	87%	87%	92%	78%
Yes	13%	13%	8%	22%
Total	100%	100%	100%	100%
19. How would you get to the places you need to go if TriMet was not an option? (multiple response)				
Walk	46%	43%	41%	50%
Get rides from someone else	33%	38%	29%	37%
Drive my own car, truck, van, or motorcycle	38%	29%	51%	20%
Bike	32%	22%	31%	27%
I would not be able to go where I need to go	15%	13%	11%	20%
Use ride hail services like taxi, Lyft, Uber	14%	12%	17%	11%
Use carshare services like Zipcar or Car2Go	8%	4%	10%	4%
Don't know	0%	0%	0%	0%
Other	2%	2%	1%	3%

	Race/Ethnicity		150% FPL	
	Non-minority 63% n=4,445	Minority 37% n=2,640	Above 58% n=3,201	At / Below 42% n=2,338
20. Do you normally have a car available for your use, either as the driver or as a passenger (not including carshare services like Zipcar or Car2Go)?				
No	51%	60%	39%	72%
Yes	49%	40%	61%	28%
Total	100%	100%	100%	100%
21. Including yourself, how many people live in your household?				
<i>Mean</i>	2.8	3.3	2.5	3.2
22. How many working cars, trucks, vans or motorcycles are there in your household?				
<i>Mean</i>	1.3	1.3	1.4	1.0
23. Annual household income before taxes in 2015. NOTE: Don't know removed				
Under \$10,000	15%	26%	-	44%
\$10,000-\$19,999	13%	16%	-	34%
\$20,000-\$29,999	13%	15%	13%	14%
\$30,000-\$39,999	11%	11%	14%	7%
\$40,000-\$49,999	8%	7%	13%	1%
\$50,000-\$59,999	6%	5%	10%	-
\$60,000-\$69,999	6%	4%	9%	-
\$70,000-\$79,999	5%	4%	8%	-
\$80,000-\$89,999	4%	2%	6%	-
\$90,000-\$99,999	4%	2%	6%	-
\$100,000 or more	14%	7%	21%	-
Total	100%	100%	100%	100%
150% Federal Poverty Level				
Above FPL	65%	45%	100%	
At or below FPL	35%	55%		100%
Total	100%	100%	100%	100%

	Race/Ethnicity	
	Non-minority	Minority
Spanish surveys: How well do you speak English?		<i>n=86</i>
Not at all		31%
Not well		61%
Well		6%
Very well		2%
Total		100%

150% FPL	
Above	At / Below
<i>n=13</i>	<i>n=33</i>
15%	27%
62%	67%
15%	6%
8%	0%
100%	100%
<i>Caution small cell size</i>	

What language do you speak at home? (asked if not English or Spanish survey)		<i>n=108</i>
Vietnamese		13%
Chinese		18%
Russian		14%
Korean		3%
Japanese		7%
Ukrainian		6%
Romanian		2%
Tagalog		2%
Arabic		9%
Mon-Khmer, Cambodian		0%
Somali		1%
Other languages		27%
Total		100%

Languages above - How well do you speak English?		<i>n=74</i>
Not at all		26%
Not well		50%
Well		22%
Very well		3%
Total		100%

Attachment Q

OUTREACH MATERIALS FOR 2016 TITLE VI PROGRAM UPDATE

Community Forum on Transit, Civil Rights & Equity

Come have a bite and join a discussion about TriMet service and fares.



**Friday, June 3, 2016
6-8 p.m.**

**Jade/APANO Multicultural
Space (JAMS)**

8114 SE Division Street
Portland, OR 97206
TriMet bus lines 4, 72



Plan your trip at trimet.org/planner or by calling 503-238-7433

If you require an interpreter or other communication aids at a meeting, please call 503-802-8200 or TTY 7-1-1 (8:30 a.m. to 4:30 p.m. weekdays) at least 48 hours in advance of the meeting.

Food and childcare provided.



Foro Comunitario: Transporte Público, Derechos Civiles y Equidad

¡Acompáñenos a merendar y a discutir el servicio de TriMet y sus tarifas!



Viernes, Juno 3, 2016
6-8 p.m.

**Jade/APANO Multicultural
Space (JAMS)**

8114 SE Division Street
Portland, OR 97206
TriMet líneas de bus 4, 72



Planifique su viaje en trimet.org/planner o llamando al 503-238-7433

Si requiere interprete u otras ayudas asistivas y de comunicación durante la reunión favor de llamar al 503-802-8200 o al TTY 7-1-1 (8:30 a.m. a 4:30 p.m. de lunes a viernes) por lo menos 48 horas antes de la reunión.

Se proveerán boletos de TriMet, comida, y cuidado de niños.





Equity, Civil Rights, and TriMet

Community Forum

May 31, 2016

Title VI of the Civil Rights Acts of 1964

“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.”



Federal Transit Administration Requirement

The transit provider shall **engage the public** in the decision-making process to develop the:

1. **Major Service Change** policy
2. **Disparate Impact** (minority) policy & threshold
3. **Disproportionate Burden** (low-income) policy & threshold



WHAT DOES THAT MEAN?

Major Service Change

- Current Policy: Change of 25%
 - *Route Length*
 - *Hours of Service*
 - *Frequency*

Major Service Change

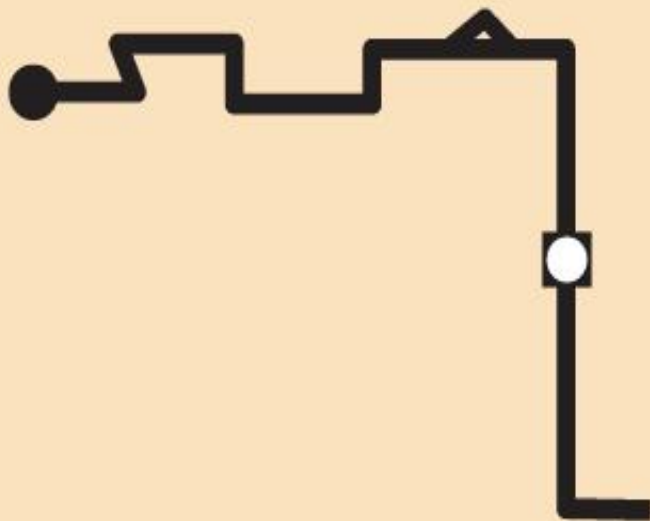
- Current Policy: Change of 25%
 - *Route Length*
 - *Hours of Service*
 - *Frequency*

Reduction in Route Length

Why is this a “Major Service Change”?

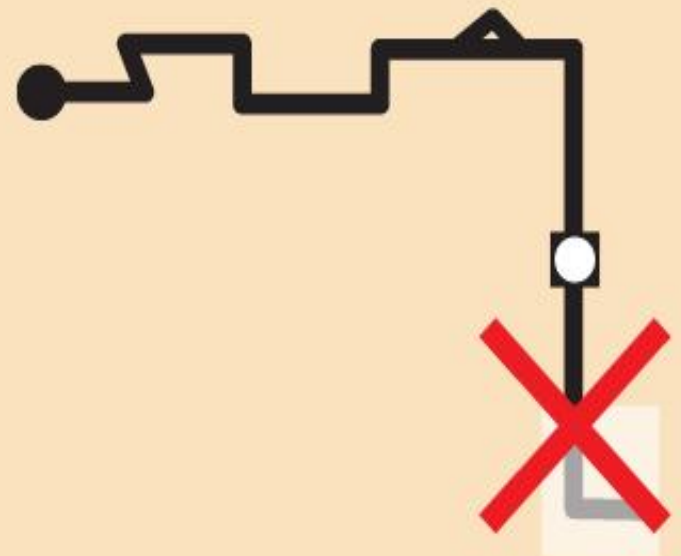
Because the route’s length was reduced by 5 miles, or by 25%

Service **BEFORE**



Total length = 20 miles

Service **AFTER**



Total length = 15 miles

25%

Major Service Change

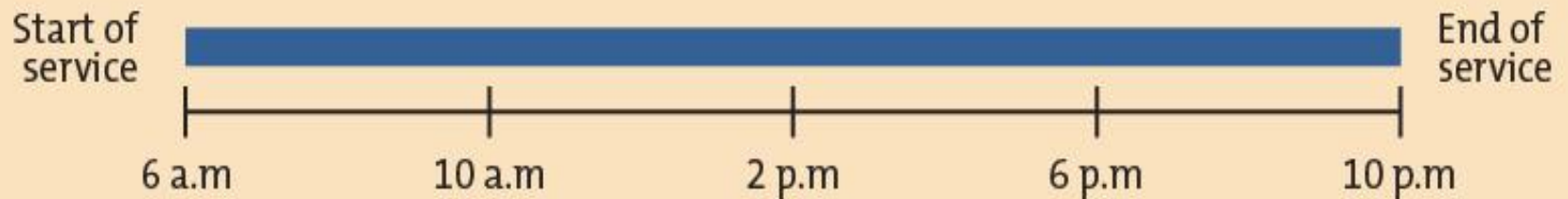
- Current Policy: Change of 25%
 - *Route Length*
 - *Hours of Service*
 - *Frequency*

Reduction in Hours of Service

Why is this a “Major Service Change”?

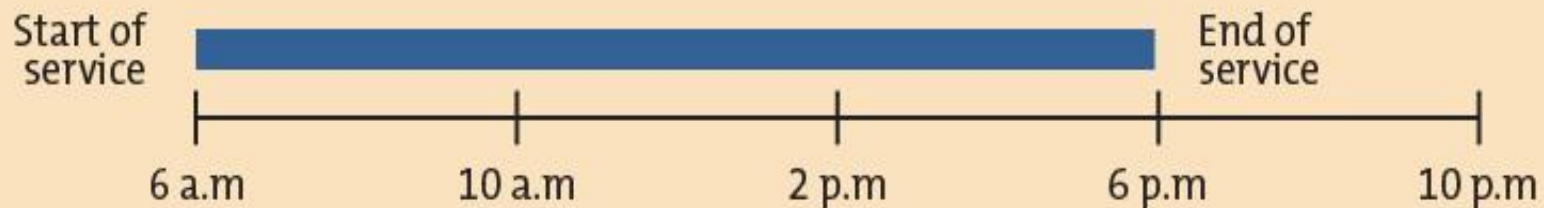
Because the length of time service is provided would be reduced from 16 hours per day to 12 hours per day, or by 25%

Service BEFORE



25%

Service AFTER



Major Service Change

- Current Policy: Change of 25%
 - *Route Length*
 - *Hours of Service*
 - *Frequency*

Less Frequent Service

Why is this a “Major Service Change”?

Because the frequency of service would be reduced from 4 buses per hour to 3 buses per hour, or by 25%

Service **BEFORE**



4 buses per hour = every 15 minutes

25%

Service **AFTER**



3 buses per hour = every 20 minutes

Major Service Change

- Current Policy: Change of 25%

Also applies to service increases

Major Service Change

➤ Current Policy: Change of 25%

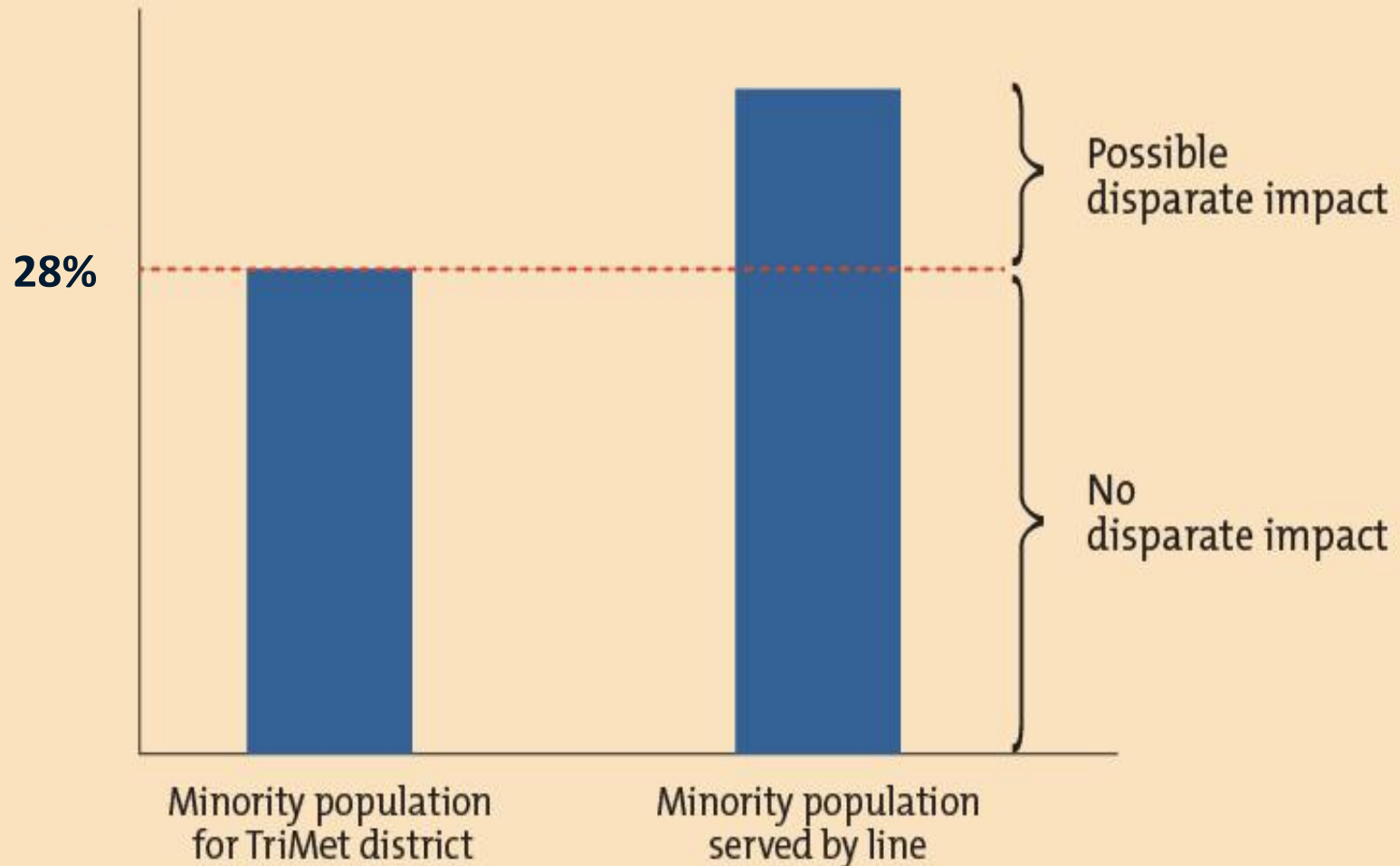
Recent examples

- Weekend frequent service restoration: Lines 8, 9, 15, 33, 54, 56
- Bus service changes with opening of MAX Orange Line: Lines 28, 31, 32, 33, 34, 99
- March 2016: Line 87
- Summer 2016: New Line 97 on Tualatin-Sherwood Rd

Disparate Impact & Disproportionate Burden

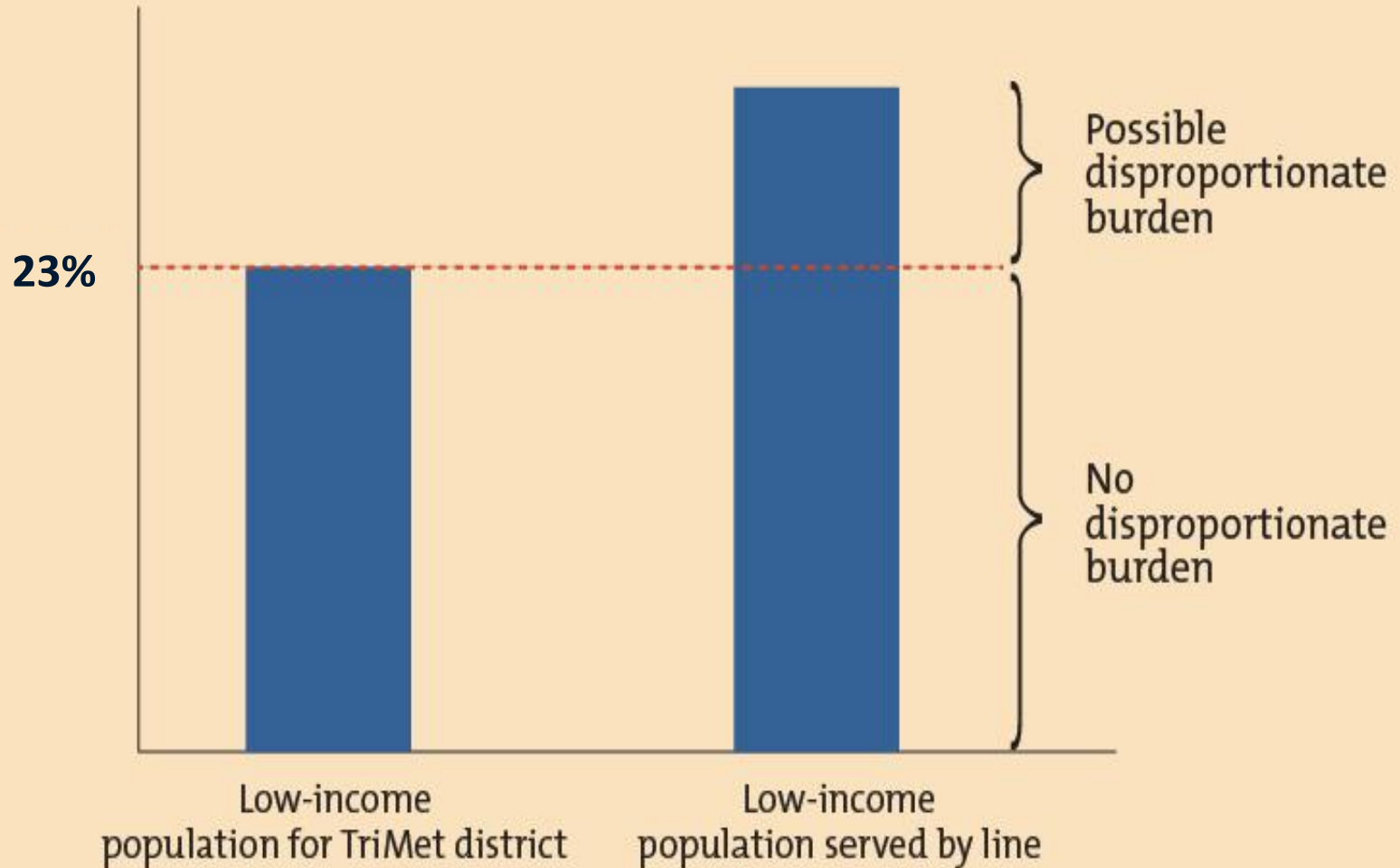
Bottom line: We want to know whether **low-income** and **minority** populations are unfairly **burdened** by proposed service cuts, or do not **benefit** fairly from proposed service improvements.

Testing for “Disparate Impact” on a Single Line



28% = minority population within TriMet district

Testing for “Disproportionate Burden” on a Single Line



23% = 150% of Federal Poverty Level



DISCUSSION QUESTIONS



Say you had 10 “votes” to help decide how TriMet should **increase bus and MAX service**. How would you place those 10 votes among the following four options?:

- _____ *More frequent service (buses come more often)*
- _____ *Earlier and later service*
- _____ *Additional weekend service*
- _____ *New/extended lines to serve new areas*

Why did you distribute your votes in this way?



Now imagine TriMet needs to make service cuts because there is not enough money in the budget to provide service at current levels.

Again you have 10 “votes” to help decide how TriMet should make **service cuts**. How would you place those 10 votes among the following four options?:

- _____ *Make service on some routes less frequent (buses come less often)*
- _____ *Shorten hours of service on some routes (start later and end earlier)*
- _____ *Cut weekend service on some routes*
- _____ *Stop serving some areas with low ridership (shorten routes and/or cut entire routes)*

Why would you make cuts in this way?



TriMet currently does **equity analysis** of proposed service changes by looking at the percentage of the population that is low-income or minority living by lines proposed for changes.

*Do you think this is a good way to **measure potential impacts** of service changes?*

*What **other factors** might TriMet consider when looking at impacts of proposed service changes on minority and low-income riders? (e.g., Access to jobs? Number of people impacted instead of just percentage?).*



Describe a time when you **felt the impacts** – either good or bad – of a **change** to a TriMet line you ride.

What was the change?

*If you were affected negatively, what could TriMet have done to **lessen the impact** (besides not making the change)?*



In addition to evaluating service changes, TriMet also does equity analysis of proposed fare changes.

What factors should TriMet consider when making changes to fares (like increases, decreases, or new options for paying), specifically so that low-income and minority riders are not unfairly burdened?



TriMet Title VI Discussion Questions

1. Say you had 10 “votes” to help decide how TriMet should increase bus and MAX service.

How would you place those 10 votes among the following four options?:

_____ *More frequent service (buses come more often)*

_____ *Earlier and later service*

_____ *Additional weekend service*

_____ *New/extended lines to serve new areas*

Why did you distribute your votes in this way?

2. Now imagine TriMet needs to make service cuts because there is not enough money in the budget to provide service at current levels. Again you have 10 “votes” to help decide how TriMet should make service cuts.

How would you place those 10 votes among the following four options?:

_____ *Make service on some routes less frequent (buses come less often)*

_____ *Shorten hours of service on some routes (start later and end earlier)*

_____ *Cut weekend service on some routes*

_____ *Stop serving some areas (shorten routes and/or cut entire routes)*

Why would you make cuts in this way?



3. TriMet currently does equity analysis of proposed service changes by looking at the percentage of the population that is low-income or minority living by lines proposed for changes.

Do you think this is a good way to measure potential impacts of service changes?

What other factors might TriMet consider when looking at impacts of proposed service changes on minority and low-income riders? (e.g., Access to jobs? Number of people impacted instead of just percentage?)

4. Describe a time when you felt the impacts – either good or bad – of a change to a TriMet line you ride.

What was the change?

If you were affected negatively, what could TriMet have done to lessen the impact (besides not making the change)?

5. In addition to evaluating service changes, TriMet also does equity analysis of proposed fare changes.

What factors should TriMet consider when making changes to fares (like increases, decreases, or new options for paying), specifically so that low-income and minority riders are not unfairly burdened?

6. *(This question is being asked on behalf of Metro, our regional government.)*

Metro has heard from public engagement efforts within the past year that affordable housing and transportation costs is a top priority for people in the region.

Would you agree? Y/N

The issues of affordability identified as a significant concern by historically underrepresented communities are listed below.

Which of these affordability issues are also a significant concern for you?

- Reducing the upfront costs of using the system*
- Making bicycling, walking, driving and using transit viable options for all incomes*

What other affordability issues are significant concerns for you?

Preguntas para la discusión de TriMet sobre el Título VI

1. Suponga que tiene 10 “votos” para comunicarle a TriMet como debe aumentar el servicio de trenes MAX y de los autobuses

Como usaría sus votos en las siguientes cuatro opciones?:

- _____ Servicio más frecuente (que lleguen más seguido los autobuses)
- _____ Servicio más temprano y más tarde
- _____ Servicio adicional en los fines de semana
- _____ Nuevas líneas de autobuses o extender líneas de autobuses a que presten servicio en nuevas áreas.

Díganos, ¿Por que escogió esas opciones?

2. Imagínese que Trimet tiene que recortar servicio porque no tiene suficiente dinero en el presupuesto para proveer servicio al nivel actual. ¿Si tuviera 10 votos para decidir que se recorta como aconsejaría a TriMet que haga los recortes?

¿Cómo usaría sus 10 votos en las siguientes cuatro opciones?:

- _____ Tener servicio menos frecuente en algunas rutas (los autobuses llegan menos)
- _____ Acortar el servicio en algunas rutas (empezar mas tarde y terminar más temprano)
- _____ Cortar el servicio en los fines de semana en algunas rutas
- _____ No prestar servicio en algunas áreas (recortar rutas y/o eliminar por completo algunas rutas)

Díganos, ¿Por que escogió esos recortes?

3. TriMet analiza los cambios propuestos al servicio llevando a cabo un análisis de equidad en el que se toma en cuenta el porcentaje de la población de bajos ingresos o minoritaria que reside en el área por donde transitan las líneas (de trenes y autobuses) a las que se les proponen un cambio.

¿Piensa que esta sea una buena manera de medir los impactos potenciales de los cambios al servicio?

Hay otros factores que TriMet debería considerar cuando revisa los impactos de los cambios propuestos al servicio tocante a pasajeros minoritarios o de bajos ingresos (ejemplo, acceso a trabajos, número de personas impactadas no solo el porcentaje de personas impactadas)

4. Díganos de alguna vez cuando sintió el impacto, bueno o malo, debido a un cambio que TriMet le hizo a una línea en que usted viaja.

Cual fue el cambio?

Si le impactó negativamente, ¿como podría TriMet haber disminuido el impacto de ese cambio (además de no llevar a cabo el cambio)?

5. Además de evaluar los cambios al servicio, TriMet también lleva a cabo un análisis de equidad cuando se proponen cambios a las tarifas.

¿Qué factores debe TriMet considerar cuando propone cambios a las tarifas para que los pasajeros de bajos ingresos o minoritarios no sean injustamente sometidos a aumentos de tarifa, rebajas, o a nuevas opciones de pago?

6. *(Esta es una pregunta departe de Metro, nuestro gobierno regional)*

En reuniones donde ha participado el público este ultimo año, Metro ha escuchado que vivienda accesible (razonable) y costos de transporte son de máxima prioridad para las personas en la región.

¿Está de acuerdo con esto? Sí/No

Hemos listado a continuación, los asuntos de accesibilidad (precios razonables identificados como una gran preocupación por comunidades que no han sido representadas históricamente

¿Cuáles de estos asuntos de accesibilidad le preocupan a usted también?

- Reducir el costo inicial para usar el sistema*
- Que el andar en bicicleta, caminar, manejar y usar el transporte público sean opciones viables para las personas de todos los niveles de ingreso.*

¿Que otros asuntos de accesibilidad le preocupan bastante a usted?



Community Service Providers Questionnaire

TriMet is in the process of updating its Title VI civil rights policies, which help ensure that our decisions about service and fares are made equitably. As part of this process we are soliciting your help because you serve the very populations these policies are meant to help protect.

Please complete the following questionnaire by **Friday, July 8th, 2016** (it should only take 5-10 minutes). And thank you for all you do to make our community a better place for all!

1. Does your agency have a definition for **low-income status**?
 1. Yes>>What is it? (*For example: below Federal Poverty Level, 80% of Area Median Income, etc.*)
 - a. *What is the basis for this definition?*
 2. No

2. During the Great Recession, TriMet was forced to make service cuts and increase fares to address significant budget shortfalls. With the economy improving, the agency has been able to restore service that was reduced and begin to make improvements throughout the TriMet system.

From what you have observed, has TriMet made any **changes to service or fares** in the recent past that have had a significant impact (positive or negative) on the clients you serve?

3. Does your organization formally or informally evaluate its policies or programs for **potential disproportionate impacts** on low-income persons and/or persons of color?
 1. Yes>> Please describe an example of how your organization has conducted this type of evaluation.
 2. No

Thank you for taking the time to help inform TriMet's civil rights policies! If you have any questions, please contact Jake Warr at warrj@trimet.org.