



**Title VI Service Equity Analysis: FY2025 Annual Service Plan**

**April 8, 2024**

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## I. Executive Summary

TriMet is proposing to implement several service changes in fall 2024 through spring 2025. In accordance with Title VI of the Civil Rights Act of 1964 and FTA Circular 4702.1B, TriMet conducts a Service Equity Analysis to ensure that minority and low-income populations are not unfairly impacted any time Major Service Changes are proposed. The FY2025 Annual Service Plan includes Major Service Changes to 31 bus lines, which require an analysis prior to action by the TriMet Board of Directors.

### A. Methodology

TriMet's Title VI Program outlines the agency's Major Service Change, Disparate Impact, and Disproportionate Burden policies and Equity Analyses. TriMet analyzes Major Service Changes for potential adverse effects and distribution of benefits based on race/ethnicity or income at the individual line-level and system-level.

### B. Major Service Changes

The proposed changes to 31 lines meet TriMet's thresholds for Major Service Changes:

- Line 17-Holgate/Broadway
- Line 21-Sandy Blvd/223rd
- Line 24-Fremont/NW 18th
- Line 25-Glisan/Rockwood
- Line 29-Lake/Webster Rd
- Line 31-Webster Rd
- Line 32-Oatfield
- Line 33-McLoughlin/King Rd
- Line 34-Linwood/River Rd
- Line 40 (new route)
- Line 47-Main/Evergreen
- Line 52-Farmington/185th
- Line 55-Hamilton
- Line 67-Bethany/158th
- Line 70-12th/NE 33rd Ave
- Line 76-Hall/Greenburg
- Line 77-Broadway/Halsey
- Line 79-Clackamas/Oregon City
- Line 80-Kane/Troutdale Rd
- Line 81-Kane/257th
- Line 85-Swan Island
- Line 86 (new route)
- Line 87-Airport Way/181st
- Line 96-Tualatin/I-5
- Line 99-Macadam/McLoughlin
- Line 153 (new route)
- Line 154-Willamette/Clackamas Heights
- Line 291-Orange Night Bus

**Blue Night Bus (new route)**  
**Red Night Bus (new route)**  
**Yellow Night Bus (new route)**

### C. Findings

1. There are **no system-level** disparate impacts or disproportionate burdens for the Major Service Improvements or Major Service Reductions
2. There are **16 potential line level** disparate impacts or disproportionate burdens for the Major Service Improvements and Major Service Reductions

## II. Background

TriMet's Annual Service Plan for FY2025 (July 1, 2024 – June 30, 2025) proposes major service changes to 31 bus lines to continue implementing the Forward Together Service Concept focused on ridership and improving connections to destinations for people with low and limited incomes. Other changes proposed for FY2025 do not meet the Major Service Change threshold to be reviewed in this analysis.

This report documents the equity analysis conducted for the major service changes.

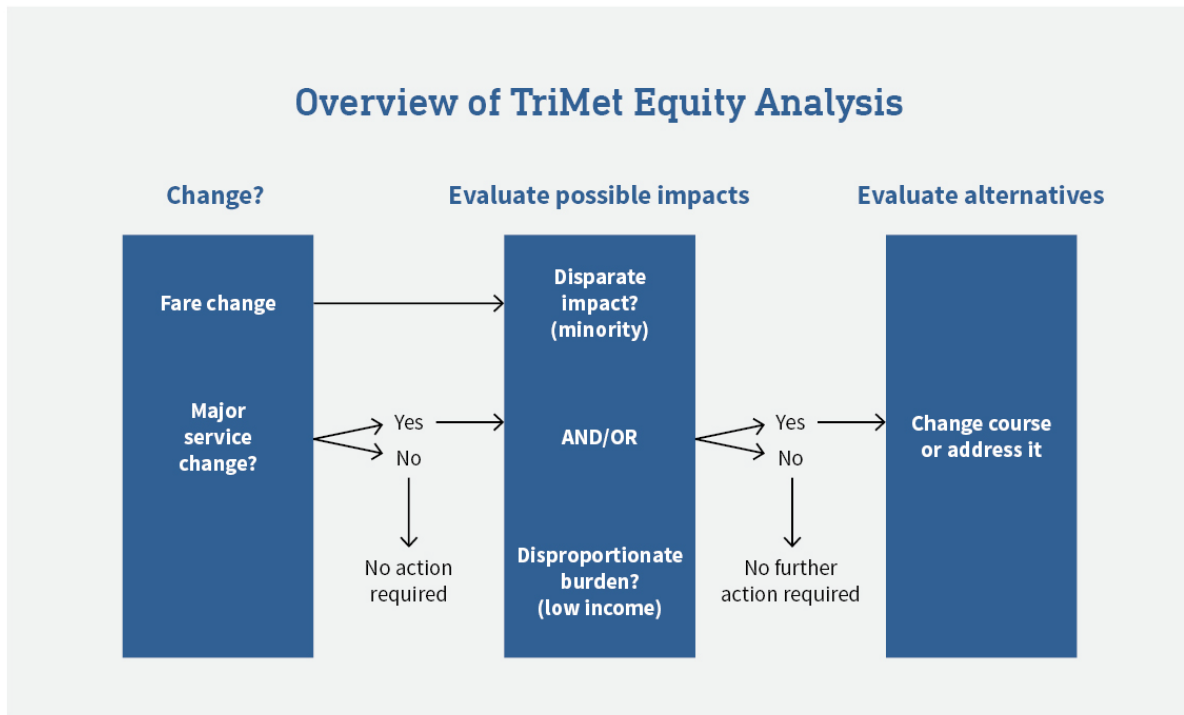
## III. TriMet Title VI Compliance

As a recipient of Federal Transit Administration (“FTA”) financial assistance, TriMet must ensure that service changes – both improvements 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 and minority populations by conducting a service equity analysis. Figure 1 shows the general sequence of steps and considerations in the equity analysis process.

Figure 1: Overview of TriMet's Title VI Equity Analysis process



TriMet's Title VI Program 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, outlined below.

### A. Major Service Change Policy

Any service change that meets the Major Service Change threshold is subject to a Title VI Equity Analysis prior to Board approval. The completed Title VI Equity Analysis must be presented to the Board for consideration and included in the subsequent TriMet Title VI Program with a record of action taken by the Board.

A **Major Service Change** is:

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** of service on a daily basis for the day of the week for which a change is made, as measured by revenue hours, 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, as measured by revenue hours, or;

4. A single transit line is **split** into two or more transit lines,
5. A transit line is retired or eliminated from service, or;
6. A **new transit line** is established.

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

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

## B. Disparate Impact Policy

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

In the course of performing a Title VI Equity Analysis for possible disparate impact, TriMet will analyze how the proposed major service change or fare change action could impact minority populations, as compared to non-minority populations.

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

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

1. A decrease in the level of transit service (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 an individual line, and for system-level impacts of changes on more than one line, as well as for both service reductions and service improvements.

1. In the event of potential adverse effects resulting from service reductions:
  - a) A Major Service Change to a *single line* will be considered to have a potential Disparate Impact if the percentage of impacted minority population in the service area of the line exceeds the percentage of minority population of the TriMet District as a whole by at least 3 percentage points (e.g., 35 percent compared to 32 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., 29 percent compared to 32 percent).
  - b) To determine the *system-wide* impacts of major service change improvements on more than one line, the percentage of the TriMet district's minority population that is impacted is compared to the percentage of the TriMet district's non-minority population that is impacted. If the percentage of the minority population impacted is at least 20 percent less than the percentage of the non-minority population impacted (e.g., 8 percent compared to 10 percent), the overall impact of changes will be considered disparate.
3. Additional considerations to complement the quantitative Disparate Impact analysis above may include evaluating impacts to accessing employment, education, food, or health care for minority populations.

Upon determination of Disparate Impact, TriMet will either:

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

### C. Disproportionate Burden Policy

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

## IV. Proposed Service Changes

### A. Major Service Change Test

To evaluate whether individual service changes meet the definition of Major Service Change, the criteria in III.A. are applied to the proposals, comparing current and proposed route length and/or revenue hours as appropriate.

Results of the evaluation are shown in Table 1:

**Table 1: Results of Major Service Change Test By Line**

Line	Route Length Change	Frequency/Span Change	Merge Lines	Split Line	Eliminate Line	New Line or Service
Line 17		>15%				
Line 21			X			
Line 24			X		X	
Line 25		>15%				
Line 29		>15%				
Line 31		>15%				
Line 32	>15%					
Line 33	>15%					
Line 34		>15%				
Line 40						X
Line 47		>15%				
Line 52		>15%				
Line 55						X
Line 67		>15%				
Line 70		>15%				
Line 76	>15%					
Line 77		>15%				
Line 79		>15%				
Line 80			X			



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Line 81			X			
Line 85					X	
Line 86						X
Line 87		>15%				
Line 96	>15%					
Line 99					X	
Line 153						X
Line 154					X	
Line 291	>15%					
Blue Night Bus						X
Red Night Bus						X
Yellow Night Bus						X

Note: The FY2025 Annual Service Plan also included minor change to several bus and MAX lines (8, Blue, Green, Orange, Red, Yellow) that are not included in this analysis because they do not meet the Major Service Change threshold.

**B. Line-level Analyses**

Having identified the service changes which meet the definition of Major Service Change, the next step in the analysis is to look at each line individually to determine potential Disparate Impacts (minority populations) and/or Disproportionate Burdens (low-income populations).

Both service reductions and service improvements are analyzed. For service improvements, 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 within ¼ mile buffers of bus stops on each line proposed for a Major Service Change to the minority and low-income populations of the TriMet District as a whole. The analysis is separated by type of service change being proposed:

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

**1. Major Service Reduction**

For service reductions, the analysis examines whether *adverse effects* are disproportionately borne by minority or low-income populations. If *adverse effects* are identified and a line’s minority and/or low-income populations are at least 3 percentage points greater than the minority or low-income populations for the TriMet District as a whole, the proposed change is flagged as a potential Disparate Impact or Disproportionate Burden.

The FY2025 Annual Service Plan includes **five Major Service Reductions** and the results of the line-level potential Disparate Impact and Disproportionate Burden analyses shown in Tables 2 & 3:

**Table 2: Potential Line-Level Major Service Reduction Disparate Impact Analysis**

Minority Single Line Disparate Impact - Service Reduction				
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., 32 percent compared to 29 percent).				
Percent minority population for entire TriMet District:			32.80%	
Disparate Impact by Line				
Line	Total Line Population	Minority Population	Percent Minority Population	Potential Disparate Impact
47	31,236	14,145	45.30%	YES
70	25,471	5,297	20.80%	NO
85	2,988	894	29.90%	NO
99	38,308	9,186	24.00%	NO
154	8,463	1,253	14.80%	NO
Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Table: (5-Year Estimates) Table B03002-Hispanic or Latino Origin By Race <a href="https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=40">https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=40</a>				

**Table 3: Potential Line-Level Major Service Reduction Disproportionate Burden Analysis**

Low-Income Single Line Disproportionate Burdens - Service Reduction				
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).				
Percent low-income population for the entire TriMet service district:			16.50%	
Disproportionate Burden by Line				
Line	Total Population	Low-Income Population	Percent Low-Income Population	Potential Disproportionate Burdens
47	31,236	5,026	16.30%	NO
70	25,244	4,724	18.70%	NO
85	2,535	552	21.80%	YES
99	35,791	8,891	24.80%	YES
154	8,463	1,253	14.80%	NO
Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey 5Y Estimates Table: Table C17002-Ratio Of Income To Poverty Level In The Past 12 Months (Block Group Level Data) <a href="https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=42">https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=42</a>				

➤ **Lines 47, 85, 99**

These changes would reduce service for populations that are above the Disparate Impact or Disproportionate Burden thresholds for Major Service Reductions. This indicates **three potential line level impacts**, calling for further examination in the system-level analysis section

**2. Major Service Improvements**

For service improvements, the analysis examines whether *benefits* are inclusive of minority and low-income populations. If *benefits* are identified and a line’s minority and/or low-income populations are at least 3 percentage points less than the minority or low-income populations for the TriMet District as a whole, the proposed change is flagged as a potential Disparate Impact or Disproportionate Burden.

The FY2025 Annual Service Plan includes **26 Major Service Improvements** and the results of the line-level potential Disparate Impact and Disproportionate Burden analyses are shown in Tables 4 & 5:

**Table 4: Potential Line-Level Major Service Improvement Disparate Impact Analysis**

Minority Single Line Disparate Impact - Service Improvement				
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., 26 percent compared to 29 percent).				
Percent minority population for entire TriMet District:				32.80%
Disparate Impact by Line				
Line	Total Line Population	Minority Population	Percent Minority Population	Potential Disparate Impact
17	68,601	20,714	30.20%	NO
21	22,724	11,995	52.80%	NO
24	59,960	21,574	36.00%	NO
25	33,302	14,599	43.80%	NO
29	15,838	3,729	23.50%	YES
31	20,057	3,927	19.60%	YES
32	18,196	3,186	17.50%	YES
33	38,559	8,619	22.40%	YES
34	32,744	6,841	20.90%	YES
40	33,683	9,268	27.50%	YES
52	34,493	16,684	48.40%	NO
55	27,804	6,988	25.10%	YES
67	17,566	7,695	43.80%	NO
76	30,395	11,849	39.00%	NO
77	70,240	23,053	32.80%	NO
79	12,536	3,172	25.30%	YES
80	19,132	6,251	32.70%	NO
81	18,833	6,169	32.80%	NO
87	21,613	10,148	47.00%	NO
95	26,727	12,134	45.40%	NO
96	44,664	12,287	27.50%	YES
153	16,021	3,167	19.80%	YES
291	24,190	6,576	27.20%	YES
Blue Night Bus	67,860	29,994	44.20%	NO
Red Night Bus	1,293	488	37.70%	NO
Yellow Night Bus	22,973	6,963	30.30%	NO

Sources: [TriMet GIS](#), [Metro Regional Land Information System](#), and [US Census American Community Survey Table: \(5-Year Estimates\) Table B03002-Hispanic or Latino Origin By Race](#)  
<https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=40>

**Table 5: Potential Line-Level Major Service Improvement Disproportionate Burden Analysis**

Low-Income Single Line Disproportionate Burdens - Service Improvement				
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).				
Percent low-income population for the entire TriMet service district:				16.50%
Disproportionate Burden by Line				
Line	Total Population	Low-Income Population	Percent Pop. Low-Income	Potential Disproportionate Burden
17	65,112	14,183	21.80%	NO
21	22,452	6,837	30.50%	NO
24	59,558	12,395	20.80%	NO
25	33,001	9,559	29.00%	NO
29	15,659	2,959	18.90%	NO
31	19,479	3,612	18.50%	NO
32	18,064	3,237	17.90%	NO
33	37,973	8,295	21.80%	NO
34	32,400	6,989	21.60%	NO
40	30,870	8,134	26.30%	NO
52	34,283	7,281	21.20%	NO
55	26,970	5,750	21.30%	NO
67	17,463	1,433	8.20%	YES
76	30,226	5,664	18.70%	NO
77	69,466	16,049	23.10%	NO
79	12,260	3,181	25.90%	NO
80	18,885	5,174	27.40%	NO
81	18,604	5,285	28.40%	NO
86	26,312	7,210	27.40%	NO
87	21,293	7,242	34.00%	NO
96	43,518	7,640	17.60%	NO
153	15,922	1,298	8.20%	YES
291	21,990	6,379	29.00%	NO
Blue Night Bus	66,644	19,446	29.20%	NO

Red Night Bus	1,282	469	36.60%	NO
Yellow Night Bus	20,825	6,085	29.20%	NO
<p>Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey 5Y Estimates Table: Table C17002-Ratio Of Income To Poverty Level In The Past 12 Months (Block Group Level Data) <a href="https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=42">https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=42</a></p>				

➤ **Lines 29, 31, 32, 33, 34, 40, 55, 67, 79, 96, 152, 291**

These changes would increase service for populations that are below the Disparate Impact or Disproportionate Burden thresholds for Major Service Improvements. This indicates **13 potential Disparate Impacts**, calling for further examination in the system-level analysis section.

**3. Other Major Service Changes**

There are no Other Major Service Changes.

**D. System-level Analysis**

Because more than one line is proposed for a Major Service Change, a system-level analysis is required in addition to the line-level analysis. The system-level analysis aims to measure impacts of all Major Service Changes combined to determine how equitable the impacts would be across racial/ethnic and economic lines. Service increases and service reductions are analyzed separately in order to examine both potential system-level *adverse effects* and distribution of *benefits*.

➤ **System-level Disparate Impact Analysis**

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 minority populations were impacted substantially more by service reductions than non-minority populations. The way we measure this is to test whether 20% more of the District’s minority than non-minority population were impacted by the service reductions.

The system-level Disparate Impact analysis of Major Service Increases is completed by determining what portion of the TriMet District’s minority population stands to benefit from the Major Service Change improvements, and comparing that to the portion of the District’s non-minority population that potentially benefits. A potential Disparate Impact would exist if minority populations benefitted substantially less than non-minority populations. The way we measure this is to test whether 20% less (or 4/5) of the District’s minority than non-minority population stood to benefit from the improvements.

➤ **System-level Disproportionate Burden Analysis**

The system-level Disproportionate Burden analysis of Major Service Reductions 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 low-income populations

were impacted substantially more by service reductions than higher income populations. The way we measure this is to test whether 20% more of the District’s low-income than higher income population were impacted by the service reductions.

The System-level Disproportionate Burden analysis of Major Service Increases is completed by determining what proportion of the TriMet District’s low-income population is positively impacted by the Major Service Increases, and comparing that to the District’s higher income population that is positively impacted. “Higher income” includes all persons above the low-income threshold of 150% of the federal poverty level. A potential Disproportionate Burden would exist if low-income populations benefitted substantially less than higher income populations. The way we measure this is to test whether 20% less (or 4/5) of the District’s low-income than higher income population stands to benefit from the improvements.

Table 6 compares the impacted minority and non-minority and low-income and higher income populations:

**Table 6: System-Level Major Disparate Impact and Disproportionate Analysis**

	Information	Disparate Impact		Disproportionate Burden	
		Minority	Non-Minority	Below 150% FPL	Above 150% FPL
	District-Wide Population Totals	542,317	1,110,194	269,840	1,361,593
<b>Service Reduction</b>	Impacted Population	30,917	72,557	19,164	80,810
	Impacted Population Percentage	5.7%	6.5%	7.10%	5.93%
	Disparate Impact Equation	5.7% >= (6.5%+(6.5%*20%))		7.10% >= (5.93%+(5.93%*20%))	
	Disparate Impact Criteria	5.7% >= 7.8%		7.10% >= 7.12%	
	Potential Disparate Impact or Disproportionate Burden	NO		NO	
<b>Service Improvement</b>	Impacted Population	175,985	343,566	105,422	405,758
	Impacted Population Percentage	32.5%	30.9%	39.1%	29.8%
	Disparate Impact Equation	32.5% <= (30.9%-(30.9%*20%))		39.1% <= (29.8%-(29.8%*20%))	
	Disparate Impact Criteria	32.5% <= 24.8%		39.1% <= 23.8%	
	Potential Disparate Impact or Disproportionate Burden	No		NO	
Data Source: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey 2018-2022 5Y Estimates Table: Table C17002-Ratio Of Income To Poverty Level In The Past 12 Months (Block Group Level Data) US Census American Community Survey Table: 2018-2022 (5-Year Estimates) Table B03002-Hispanic or Latino Origin By Race <a href="https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=40">https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=40</a>					

A lower percentage of the District's minority population (5.7%) is negatively impacted by the proposed Major Service Reductions, compared to the non-minority population (6.5%). Additionally, a higher percentage of the District's minority population (32.5%) stands to benefit from the proposed Major Service Improvements, compared to the non-minority population (30.9%). Therefore, a **system-level Disparate Impact is not found** for the proposed Major Service Reductions or Improvements.

A higher percentage of the District's low-income population stands to be negatively impacted by the proposed Major Service Reductions (7.10%) compared to the higher income population (5.93%). However, this does not exceed the low-income population disproportionate burden threshold (7.12%). Additionally, a higher percentage of the District's low-income population stands to benefit from the proposed Major Service Improvements (39.1%) compared to the higher income population (29.8%). Therefore, a **system-level Disproportionate Burden is not found** for the proposed Major Service Reductions or Improvements.

## V. Community Engagement

TriMet staffed conducts two rounds of public outreach, which resulted in over 2,500 comments being submitted.

The first outreach process occurred in September – November 2023 and requested public comment on a larger set of service changes than included in this report.

Staff made information available on [trimet.org/plan](https://trimet.org/plan), through public notices mailed to a ¼ mile range around the areas where service changes were proposed, postings at all bus stops that were proposed to either close or where a service change was recommended, and through eight open houses.

All of the open houses featured some non-English language translation depending on where they were located. Outreach was also conducted to communities with limited English proficiency via TriMet's multicultural outreach engagement contract. We identified the top 5 languages spoken per bus line as Spanish, Chinese, Vietnamese, Ukrainian, and Russian.

TriMet received over 1,700 comments from September 26 through November 21 via the website, open houses, emails, letters, direct conversations and calls to Customer Service.

The second outreach process occurred in January – February 2024 and requested comment on a smaller package of service changes for FY25. The service change package was reduced as a result of revised operator projections for FY24 and FY25. Additionally, some service changes were revised based on feedback from customers. Staff made information available on [trimet.org/plan](https://trimet.org/plan), through public notices mailed to a ¼ mile range around the areas where service changes were proposed, postings at all bus stops that were proposed to either close or where a service change was recommended, and through four open houses.

TriMet received over 1,000 comments from January 10<sup>th</sup> through February 16<sup>th</sup> via the website, open houses, emails, letters, and calls to Customer Service.

The following is a summary of themes across the feedback received:



- Service Upgrades – Riders supported increased frequency and span on both the proposed Frequent Service Routes and on routes.
- Route Changes – Riders shared support and concern about route changes on multiple routes that impact travel time and ability to access destinations
- Elimination – Some riders expressed concern about elimination of low-ridership and express routes, while others acknowledged decreased demand following COVID-19 travel changes

Additionally, TriMet received comments during the public hearing at the March 27 Board Meeting. TriMet staff assessed the feedback and determined it did not pertain to the Title VI populations impacted by the proposed service changes.

## VI. Summary of Findings

1. There are **no system-level** disparate impacts or disproportionate burdens for the Major Service Improvements or Major Service Reductions

Therefore a **greater share of minority and low-income populations stand to benefit** from the improvements than non-minority and higher income populations and **minority and low-income populations will not be negatively impacted substantially more** by the reductions than non-minority or higher income populations.

2. There are **16 potential line level** disparate impacts or disproportionate burdens for the Major Service Reductions and Improvements

While potential disproportionate burdens were identified for Major Service Reductions on Lines 47, 85, 99, staff recommend **reducing service or eliminating these routes due to low ridership and availability of nearby service.**

And while potential disparate impacts and disproportionate burdens were identified for Major Service Improvements on Lines 29, 31, 32, 33, 34, 40, 55, 67, 79, 96, 152, 291, TriMet staff recommend **improving service on these routes to improve access to major job destinations, schools, and address previous service reductions** implemented due to COVID-19 and operator shortage.