



Title VI Service Equity Analysis: May 2023 Service Change

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I. Executive Summary

TriMet is proposing to implement several service changes May 2023. 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 May 2023 service change includes a Major Service Changes for one bus line, 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 one line meet TriMet's thresholds for Major Service Changes:

Line 17-Holgate/Broadway

C. Findings

1. There are **no potential line level disparate impacts or disproportionate burdens** for the Major Service Improvement
2. A **greater share of the region's minority and low-income populations stand to benefit** from the Major Service Improvement compared to non-minority and higher income populations.

II. Background

TriMet proposes a major service change to one bus line to begin 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 May 2023 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 change.

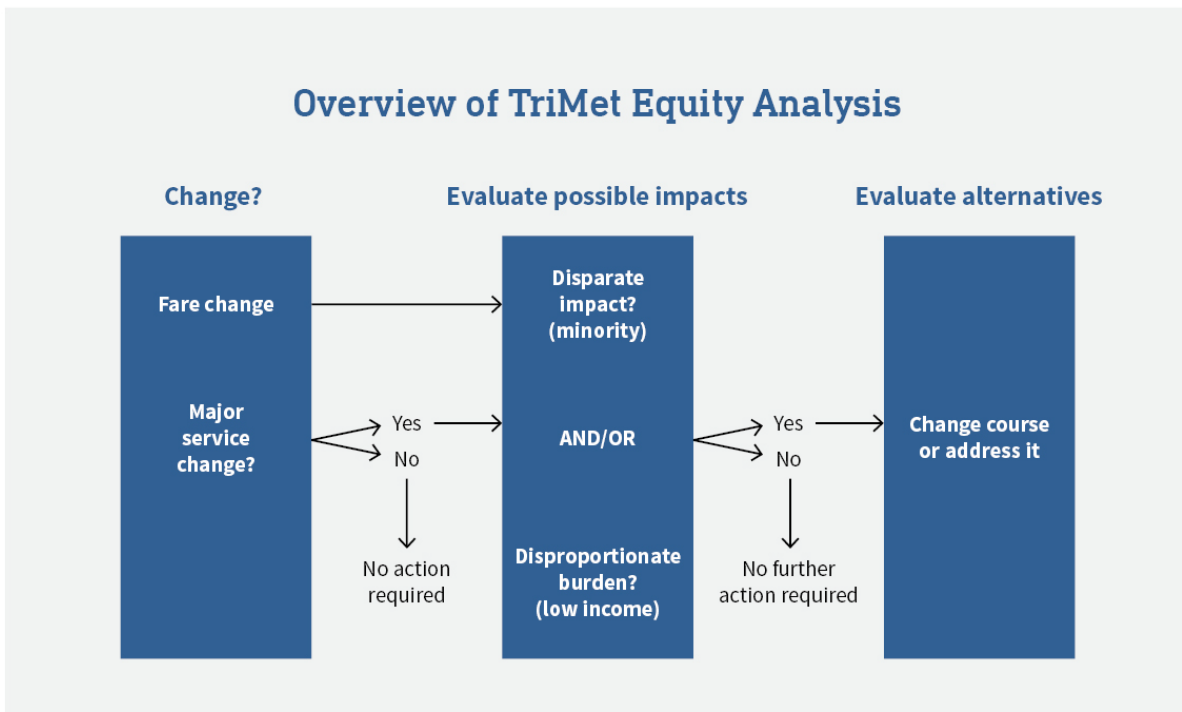
III. TriMet Title VI Compliance

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. Description of Changes

Table 1 lists the proposed changes by the type of service change:

Table 1: Proposed Service Changes in FY2024 Annual Service Plan

Line	Service Change Description
Line 17-Holgate/Broadway	➤ Increase frequency and span on the Holgate segment of Line 17.

Note: The May 2023 service change also includes a minor change to Line 70 that is not included in this analysis because it does not meet the Major Service Change threshold.

B. Major Service Change Test

To determine whether individual service changes meet the definition of Major Service Change, current and proposed route length and/or revenue hours are compared. Changes of 15% or more qualify as Major Service Changes, including changes meeting this threshold cumulatively over three years.

Results of the comparison are shown in Table 2:

Table 2: Results of Major Service Change Test By Line

Line	Route Length Change	Frequency/Span Change	Line Split	Eliminate Line	New Line or Service
Line 17		+15%			

C. 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.

There are no Major Service Reductions to be analyzed.

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 May 2023 service change includes **1 Major Service Improvement** and the results of the line-level potential Disparate Impact and Disproportionate Burden analyses shown in Tables 3 & 4:

Table 3: Potential Line-Level Major Service Improvement Disparate Impact Analysis

A Major Service Improvement to a single line will be considered to have a potential Disparate Impact if the percentage of impacted minority population in the service area are at least 3 percentage points less than the minority populations for the TriMet District as a whole (e.g., 29 percent compared to 32 percent).				
Percent minority population for entire TriMet District: 32.0%				
Line	Total Line Population	Minority Population	Percent Minority Population	Single Line Disparate Impact (<=29.0%)
17	71,271	20,861	29.3%	No
Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey Table: 2017-2021 (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 4: Potential Line-Level Major Service Improvement Disproportionate Burden Analysis

A Major Service Improvement 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 are at least 3 percentage points less than the low-income populations for the TriMet District as a whole (e.g., 13.8 percent compared to 16.8 percent).

Percent population earning below 150% federal poverty level for the entire TriMet service district: 16.8%

Line	Total Population	Population Below 150% FPL	Percent 150% Below FPL Population	Single Line Disproportionate Burdens (<=13.8%)
17	67,864	14,691	21.6%	NO

Sources: TriMet GIS, Metro Regional Land Information System, and US Census American Community Survey 2017-2021 5-Year Estimates Table: Table C17002-Ratio Of Income To Poverty Level In The Past 12 Months (Block Group Level Data)
<https://trimet.org/equity/pdf/TriMet-2022-Title-VI-Program-Update.pdf#page=42>

3. Other Major Service Changes

There are no Other Major Service Changes.

D. System-level Analysis

Because only one line is proposed for a Major Service Change, a system-level analysis is not required.

V. Community Engagement

The Line 17-Broadway/Holgate changes were included in the Sept.-Oct. public process for Forward Together Service Concept, but not the Jan.-Feb. public process for the FY24 Service Changes. This is because the Line 17-Holgate service changes weren't in the original proposal for the FY24 Service Changes. However, they were added in response to feedback received regarding the Line 70-12th/NE33rd service changes shared with the community during the public process for the FY24 changes. As a result, the Line 17 service changes were added as a mitigation to an issue raised during the community engagement for Line 70. Community outreach will occur prior to implantation of the change in May 2023.

VI. Summary of Findings

Table 5 summarizes the results of the line-level Disparate Impact and Disproportionate Burden analyses:

Table 5: Summary of Disparate Impact and Disproportionate Burden Analysis Results

	Potential Disparate Impact?	Potential Disproportionate Burden?

May 2023 Service Change Equity Analysis

Major Service Reductions		-	-
Major Service Improvements	Line 17-Holgate/Broadway	No	No
Other Major Service Changes		-	-

Since no potential line-level disparate impact or disproportionate burden was identified for the Major Service Improvement on Line 17 and no system-level analysis was required, the service area's minority and low-income populations will not benefit substantially less from the improvement than non-minority and higher income populations.