



Title VI Program

2025 Update

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



September 2025
Available at trimet.org/civilrights

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Dear Reader,

TriMet's mission is to connect people with valued mobility options that are safe, convenient, reliable, accessible and welcoming for all. We are committed to treating each and every individual who accesses our services with dignity and respect, regardless of what they look like or where they come from.

This Title VI Program, which TriMet is required to submit to the federal government every three years, outlines many of the policies and practices we employ to live up to this commitment.

Equal access and freedom from racial discrimination have not always been enshrined in law. The historic Civil Rights Act of 1964 created a mandate that public accommodations and services, like public transit, be provided in a manner that does not discriminate.

Title VI of the Civil Rights Acts of 1964 states 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 subjected to discrimination under any program or activity receiving Federal Financial assistance."

TriMet eagerly fulfills the mandate of the Civil Rights Act through robust compliance with our Title VI program. We engage in proactive measures to honor both the spirit and letter of the law.

We remain passionately committed to carrying our Title VI program forward, ensuring that everyone in our community can access and use our transit system. At TriMet we say all are welcome, and we mean all are welcome.

Sam Desue Jr.

TriMet General Manager



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Executive Summary

Overview

Every three years TriMet submits a Title VI Program update to the Federal Transit Administration (FTA). The policies, standards, practices and analysis provided in this document demonstrate how TriMet complies with Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color or national origin in programs and activities of any entity that receives federal assistance.

The FTA's Circular 4702.1B outlines the requirements for TriMet to ensure non-discrimination, which include:

- Notices to the public of rights under Title VI.
- TriMet's procedures for receiving and responding to Title VI complaints.
- A Public Participation Plan to ensure minority and low-income populations are engaged during decision-making processes.
- A Language Access Plan that demonstrates how TriMet ensures equal access for persons with limited English proficiency (LEP).
- Evidence of minority representation on TriMet's governing and advisory bodies.
- Title VI compliance monitoring of entities to whom TriMet passes federal funds (subrecipients), namely City of Portland (Portland Streetcar), Clackamas Community College, Portland Community College and Ride Connection. All TriMet subrecipients are in full compliance.
- Analysis of facility siting and construction since the last Program submission (does not apply for this submittal).
- Policies defining "Major Service Change", "Disparate Impact" and "Disproportionate Burden" and any related analyses completed since the last Program submission.
- Agency standards (regarding vehicle loads, service frequency, on-time performance and service availability) and policies (regarding distribution of stop amenities and vehicle assignment) and an analysis of adherence to these standards and policies.
- Demographic analysis pertaining to minority, LEP and low-income populations and riders.

Policies and Standards

Note: This draft Program update includes proposed modifications to the Major Service Change, Disparate Impact and Disproportionate Burden policies. Full details of these modifications are provided in Part II.

Major Service Change Policy

Definition

All changes in service meeting the definition of Major Service Change are subject to a Title VI Analysis prior to Board approval of the service change. TriMet defines a Major Service Change as any of the following:

- a. A 15% reduction or increase in a transit line's route miles, frequency or span (hours) of service.
- b. A new, removed, split or combined transit line.

Standard seasonal variations, emergency situations and temporary experimental changes are exempt from this definition.

Adverse effects vs. benefits

TriMet analyzes both adverse effects resulting from major service reductions and benefits resulting from major service improvements.

Disparate Impact Policy

The Disparate Impact Policy establishes a threshold and process for determining whether a given action has a potential unfair and adverse effect on minority populations.

Adverse effects (service reductions)

TriMet's Disparate Impact threshold is 5%, meaning if the minority population impacted by service reductions is at least 5 percentage points greater than the overall minority population in the TriMet service district (currently 34%), the reductions are flagged for a potential Disparate Impact. This is analyzed for each individual line proposed for a Major Service Change as well as all such lines combined.

Benefits (service improvements)

To ensure minority populations are not denied the benefits of service improvements, TriMet evaluates whether:

- a. A proposed improvement on a single transit line is linked to other service changes that have disproportionate and adverse effects on minority populations,

OR

- b. Considering all major service improvements combined, if the minority population living in the these transit lines' service areas is at least 5 percentage points *lower* than the service district's minority population as a whole (currently 34%), the overall effect of changes is flagged for a potential Disparate Impact.

Disproportionate Burden Policy

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

TriMet's Disproportionate Burden policy mirrors the Disparate Impact policy, but applying to low-income rather than minority populations and riders.

Fare Changes

For fare changes, a potential Disparate Impact or Disproportionate Burden is noted when adverse effects would impact a 10-percentage-point greater share of minority or low-income riders than non-minority riders or non-low-income riders (respectively).

Service Monitoring

In analyzing agency standards and policies pertaining to service performance, TriMet found no disparities in terms of system performance that would indicate lesser service provision to minority or low-income populations (see Table ES-1).

TABLE ES-1: SERVICE MONITORING RESULTS SUMMARY

Metric	Disparate Impact?	Disproportionate Burden?
Service Frequency & Span	NO	NO
On-time Performance	NO	NO
Service Availability	NO	NO
Vehicle Loads	NO	NO
Stop Amenities	NO	NO
Vehicle Assignment	NO	NO

Demographic Analysis

Population

According to the latest data from the US Census Bureau's American Community Survey (2019-2023), the population in the TriMet service district has the following demographic characteristics:

- The **minority population** is about 34%, an increase from 31% in 2022. Most areas with higher concentration of minority populations are distributed across the western, eastern and northern parts of the service area.
- The **low-income population** is about 16%, which is a slight decrease from 17% in 2022. While low-income populations live throughout the TriMet service district, they are more highly concentrated on the east side of the Willamette River (Multnomah and Clackamas Counties) than the west (primarily Washington County).
- The **LEP population** is about 7%, similar to 2022. LEP households are generally concentrated in the east and west areas of the TriMet service district.

Riders

The following are a few key findings from analyzing the responses from TriMet riders who took the 2025 Attitudes and Awareness survey:

- As a whole, minority and low-income riders ride TriMet more frequently, take more trips requiring transfers and are more likely to consider themselves dependent on TriMet for a majority of their transportation needs (compared to non-minority and non-low-income riders, respectively).
- Over one-third (35%) of non-minority riders pay the Honored Citizen fare, compared to 28% of minority riders.
- The majority (55%) of low-income riders pay the Honored Citizen fare, compared to 33% of non-low-income riders.
- Across all groups, most riders pay their fare using Hop Fastpass™ (either a plastic or virtual card). One notable difference between groups is a high percentage of low-income riders who use a plastic (rather than virtual) card: 62% compared to 43-45% for other demographics.

Facilities

GIS mapping of existing, recently completed, in progress and planned facilities (e.g., stop and station improvements, ADA text-to-speech devices, light rail track crossings) did not reveal any apparent disparities in terms of proximity to these facilities.

Introduction

What is Title VI?

Title VI of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color or national origin in programs and activities of any entity that receive federal assistance.

The Civil Rights Movement of the mid-1950s and '60s 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**, a landmark civil rights and labor law in the United States that outlaws discrimination based on race, color, national origin, religion and sex. It prohibits unequal application of voter registration requirements, racial segregation in schools and public accommodations and employment discrimination. The act stands as one of the most significant legislative achievements in American history. The Civil Rights Act of 1964, 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 United States has a long history of unjust and unequal 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, ethnicity and class — even in cases where decisions are made with the best of intentions.

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 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 unlawful 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;
- Omit participation and access by limited English proficient persons; or
- 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 paratransit public transportation service in the Portland metropolitan area, providing about 63 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 3,600 union and non-union employees.

What Does This Mean for TriMet?

The policies, standards, practices and analysis provided in this document demonstrate how TriMet (Tri-County Metropolitan Transportation District of Oregon) 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 General Manager has overall responsibility for carrying out our agency's commitment to Title VI. TriMet's Executive Director of Public Access and Innovation and the Title VI and Public Access

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.

Programs Manager are primarily responsible for administering and monitoring Title VI requirements, but it is the duty of every employee, vendor and contractor to ensure compliance with nondiscrimination and to further civil rights protections. The TriMet Board of Directors must also oversee and approve many of our agency's Title VI compliance activities.

TriMet's Commitment to Equal Access

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

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.

Low-Income Person: As defined by TriMet for the purposes of Title VI, low-income refers to a person whose median household income is at or below 150% of the U.S. Department of Health and Human Services (HHS) poverty guidelines.

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.

Low-Income Transit Route: A route that has at least one half of its total revenue mileage in a Census block or block group with a percentage of low-income population that exceeds the percentage of low-income population in the transit service area as a whole.

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 service (measured in hours) in Census block groups 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.

Non-Minority Persons: Persons identifying as exclusively as White and non-Hispanic/Latino.

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.

Safe Harbor Language: A language spoken by at least 1,000 persons in the TriMet service district. Per the Department of Justice, vital documents should be translated into safe harbor languages to demonstrate "strong evidence of compliance" with TriMet's written translation obligations.

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 Provider: Any entity that operates public transportation service including 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. A copy of the TriMet Board of Directors (Board) resolution evidencing approval of TriMet's Title VI Program is provided as [Attachment A](#): TriMet Board Resolution 25-09-47 .

This chapter 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 Access Plan
6. Board Membership and Recruitment
7. Subrecipient Monitoring
8. Title VI Analysis for Facilities Siting and Construction
9. Title VI Analyses of major service and fare changes completed since the 2022 submission

Title VI Public Notice and Complaint Procedures

TriMet posts the Title VI public notice on our agency website,² in all vehicles (bus and rail) and in our administrative offices. TriMet's Title VI complaint form³ and procedures⁴ are also available in multiple

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

³ <https://trimet.org/about/pdf/titlevi-complaint.pdf>

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

languages on our agency's website. See Attachments B, C and D for the vehicle notice, English language complaint form and administrative office notice, respectively.

TriMet's Title VI website notice is as follows:

TriMet Respects Civil Rights

TriMet operates our programs without regard to race, color, national origin, religion, gender, sex, sexual orientation, marital status or age, in accordance with applicable law.

TriMet's nondiscrimination policy statements

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."

Oregon Revised Statute 659A.403 states:

"All persons within the jurisdiction of this state are entitled to the full and equal accommodations, advantages, facilities and privileges of any place of public accommodation, without any distinction, discrimination or restriction on account of race, color, religion, sex, sexual orientation, national origin, marital status or age."

We are committed to complying with the requirements of Title VI in all of its federally funded programs and activities, as well as Oregon Revised Statute 659A.403. To request additional information on our nondiscrimination requirements, call us at 503-238-7433 (TTY 7-1-1) or send us an email.

Making a civil rights complaint

Any person who believes they have been aggrieved by an unlawful discriminatory practice under federal or state civil rights law 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 us by any of the following methods:

Under Title VI, 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 Civil Rights Complaint Form. In addition to Title VI protected categories, TriMet accepts allegations of discrimination complaints based on sex, gender identity, sexual orientation, age, religion, marital status or disability in accordance with Oregon Revised Statute 659A.403.

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, they 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 their 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 review.

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.

Title VI Investigations, Complaints and Lawsuits

This section provides information regarding investigations, lawsuits and complaints for the reporting period.

Investigations

There was one State of Oregon Bureau of Labor and Industries (BOLI) public accommodations investigation during the reporting period alleging sex and gender discrimination. It was investigated and dismissed for lack of sufficient evidence to continue investigation on July 26, 2023.

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.

Lawsuits

A complaint was filed in state court on March 10, 2025, alleging that a bus operator discriminated against complainant based on race and age. The case is currently pending.

Formal Complaints

TriMet investigated and resolved all formal allegations of discrimination (“complaints”) based on Title VI-protected classes. Table 1-1 lists formal complaints received during the reporting period.

The Action Taken/Findings category is designated in accordance with the following:

Substantiated: Sufficient information has been obtained to determine the Title VI complaint as valid.

Unsubstantiated: The investigation concludes either a) the conduct by the employee was not discriminatory based on Title VI-protected classes, b) there is insufficient information to make a finding of Substantiated, or c) 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 1-1: TITLE VI COMPLAINTS RECEIVED BY TRIMET SINCE LAST PROGRAM SUBMITTAL

Date Filed	Summary	Status	Actions Taken/Findings
10/19/22	Complaint filed with TriMet regarding unequal inspection of customers’ fares	Closed	Unsubstantiated
11/13/22	Customer service issue regarding bus operator not assisting passenger in closing windows on bus	Closed	Unsubstantiated
11/19/22	Complaint filed with TriMet regarding security guards moving complainant off train tracks	Closed	Unsubstantiated
12/1/22	Complaint filed with TriMet regarding not being allowed to board bus based on complainant’s race	Closed	Unsubstantiated

Date Filed	Summary	Status	Actions Taken/Findings
12/1/22	Customer service issue relating to an interaction with a security officer at a ticketing office	Closed	Unsubstantiated
12/28/22	Complaint filed with TriMet regarding having to pay fare while houseless people sleep on trains	Closed	Unsubstantiated
1/2/23	Customer service complaint regarding a bus pass up	Closed	Unsubstantiated
2/10/23	Complaint filed with TriMet regarding targeted fare inspection	Closed	Unsubstantiated
3/13/23	Complaint filed with TriMet regarding a bus pass up based on age and race	Closed	Unsubstantiated
3/31/23	Complaint filed with TriMet regarding bus operator closing doors on the complainant based on race	Closed	Unsubstantiated
4/25/23	Customer service issue regarding fare inspection	Closed	Unsubstantiated
5/1/23	Customer service issue regarding lack of greeting by bus operator	Closed	Unsubstantiated
5/5/23	Customer service issue regarding bus pass up	Closed	Unsubstantiated
5/20/23	Customer service issue regarding interaction with rail operator	Closed	Unsubstantiated
5/31/23	Incomplete complaint narrative	Closed	Unsubstantiated
6/2/23	Customer service issue regarding fare inspection and bus operator not allowing complainant to board	Closed	Unsubstantiated
6/30/23	Customer service issue regarding complainant not having fare	Closed	Unsubstantiated
8/2/23	Customer service issue regarding fare	Closed	Unsubstantiated
8/4/23	Customer service issue regarding bus pass up	Closed	Unsubstantiated
9/7/23	Customer service issue regarding interaction with bus operator	Closed	Unsubstantiated
9/10/23	Customer service issue	Closed	Unsubstantiated

Date Filed	Summary	Status	Actions Taken/Findings
10/19/23	Customer service issue regarding lack of fare and interaction with bus operator	Closed	Unsubstantiated
11/3/23	Customer service issue regarding complainant's bicycle	Closed	Unsubstantiated
11/24/23	Complaint filed with TriMet regarding bus pass up based on race	Closed	Unsubstantiated
11/27/23	Customer service issue regarding rail deboarding	Closed	Unsubstantiated
12/24/23	Customer service issue regarding bus operator not stopping at correct stop	Closed	Unsubstantiated
1/3/24	Customer service issue regarding bus operator's driving	Closed	Unsubstantiated
3/23/24	Complaint filed with TriMet regarding Hollywood Elevator Pilot	Closed	Unsubstantiated
5/19/24	Customer service complaint regarding paying fare	Closed	Unsubstantiated
6/11/24	Complaint filed with TriMet regarding bus pass up	Closed	Unsubstantiated
7/26/24	Complaint filed with TriMet regarding interaction with the bus operator	Closed	Unsubstantiated
8/8/24	Complaint filed with TriMet regarding interaction with bus operator	Closed	Unsubstantiated
8/24/24	Complaint filed with TriMet based on socio-economic status	Closed	Unsubstantiated
8/31/24	Complaint filed with TriMet regarding bus pass up	Closed	Unsubstantiated
9/15/24	Complaint filed with TriMet regarding rail pass up based on gender, sex and age	Closed	Unsubstantiated
9/24/24	Complaint filed with TriMet regarding bus pass up	Closed	Unsubstantiated
12/2/24	Complaint filed with TriMet regarding interaction with ticketing personnel based on national origin	Closed	Unsubstantiated
4/21/25	Complaint filed with TriMet regarding interaction with bus operator based on race	Closed	Unsubstantiated

Date Filed	Summary	Status	Actions Taken/Findings
5/8/25	Complaint filed with TriMet regarding interaction with rail operator based on national origin	Closed	Unsubstantiated
6/2/25	Complaint filed with TriMet regarding interaction with rail operator based on national origin	Closed	Unsubstantiated
6/14/25	Complaint filed with TriMet regarding interaction with bus operator based on race	Closed	Unsubstantiated

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.

In proposing service or fare changes, TriMet uses a variety of methods to communicate 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 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 LEP riders or households, TriMet staff translates materials to ensure those community members 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 minority, low-income and LEP communities. The analysis is shared with TriMet staff working with affected communities to identify strategies to engage minority, low-income and LEP populations.

TriMet's develops an annual Community Affairs & Engagement Plan; the draft plan for FY2026 (still in development) is provided as Attachment E.

Public Participation Highlights

TriMet's community engagement program is centered on nurturing strong working relationships with community partners that amplify the voices of TriMet riders. This includes convening advisory committees, partnering with local organizations to host conversations, and sponsoring and staffing community events.

This section provides highlights of TriMet's public participation efforts since its

2022 Title VI Program submission. The summary spans fall 2022 through spring 2025. During this period, TriMet held monthly meetings of the Committee on Accessible Transportation (CAT) and conducted outreach to inform major capital projects, bus service changes, a fare increase and other changes within the transit system.



FIGURE 1-1: OPEN HOUSE IN EAST PORTLAND IN 2023

Committee on Accessible Transportation (CAT)

CAT provides TriMet with ongoing input on topics related to accessibility. The committee also serves by providing TriMet staff a communications link to key community groups representing persons with disabilities and seniors. The committee's advisory role broadly covers topics related to transportation accessibility and improvements, using members' lived experience and practical familiarity with the Americans with Disabilities Act (ADA), to provide insight on important decisions impacting mobility options in the tri-county area.

Major capital projects

- **Division Transit Project** and the opening of the first TriMet FX® (Frequent Express) line
 - FX2-Division opened in September 2022, with a corridor-wide celebration that highlighted the unique communities along the route.



**FIGURE 1-2: INFORMATION BOOTH AT THE
WHITE LOTUS MID-AUTUMN FESTIVAL IN
2024**

- Prior to the opening, TriMet distributed multi-lingual safety and how-to-ride information and hosted preview rides for LEP populations and other communities.
- **A Better Red** extended MAX Red Line west to serve 10 more stations. The project also constructed a new light rail and bike/ped bridge over I-84 and added a second track near Portland International Airport and Gateway Transit Center to improve schedule reliability for the entire MAX system.
 - Construction spanned 2022 and 2023, with the new service opening in August 2024.
 - Bilingual information about construction was shared with neighbors via on-site signage, email, direct mail and in person.
 - Construction necessitated six MAX service disruptions, two freeway closures and several other traffic impacts. Outreach included email, bilingual on-site signage, social and earned media, paid advertising, and extensive in-person customer support.
- **Two future FX projects** moved from the Metro-led planning phase to TriMet's leadership for design (and eventual construction and operation). During 2022, 2023 and 2024, TriMet partnered with Metro to build relationships with affected communities. Outreach focused on gathering feedback about the FX routes and potential station locations. Efforts included bilingual signage at bus stops, online and in-person open houses, on-board surveyors, focus groups, and community meetings.
 - **The TV Highway Transit & Safety Project**, which will upgrade Line 57 to FX
 - **The 82nd Avenue Transit Project**, which will upgrade Line 72 on 82nd Avenue to FX®. In 2025, TriMet invited input on the project design by convening a Community Advisory Committee, hosting in-person and online open houses, canvassing businesses along the route, and sending email and direct mail. Outreach included focus groups with LEP populations, with recruitment support from community partners.

Bus service changes

Improvements to bus service were focused implementing the [Forward Together service concept](#), which was developed in consultation with the community during 2022. Forward Together responds to post-

pandemic needs and ways people travel. It aims to increase bus ridership and expand service, especially for people experiencing low and limited incomes. The concept brings bus service to 50,000 more people and weekend service to 100,000 more, with significant increases to frequent bus service, connecting more people to jobs and opportunity.

- A first phase of public engagement in early 2022 asked members of the public to weigh in on what our goals should be as we consider post-pandemic service changes. This engagement effort centered on an online survey, with additional outreach through community-based organizations.
- The second phase of public engagement, in October 2022, asked people to respond to a Draft Service Concept. In this phase, specific information and maps about the proposed changes were shared and TriMet requested both general and detailed feedback on the plan. This effort included an online survey, online and in-person open houses, and outreach to community-based organizations and local government partners.
- Feedback on the Draft Service Concept helped refine the Final Service Concept, released in May 2023.

Before Board approval and implementation of specific service changes, TriMet performed two rounds of outreach via direct mail, on-board outreach, social and earned media, email, open houses, and discussions with key community groups. The first round of outreach asked for feedback on an initial proposal. The second round shared how the proposal had been adjusted in response to that community input.

Other system changes

TriMet has implemented many additional changes over the past three years, including:

- Increasing the price of 2½-hour and all-day fares. This outreach process, spanning most of 2023, included an online survey available in 11 languages, seven in-person open houses (five of which were co-hosted by community partners), and five online meetings, staffed by bilingual English and Spanish speakers with American Sign Language interpretation. Feedback from more than 5,600 respondents helped identify mitigations for those most impacted.
- Adding access control equipment to elevators at three grade-separated stations. Access control is intended to improve security and minimize elevator service disruptions caused by misuse. Outreach began through conversations with TriMet's Committee

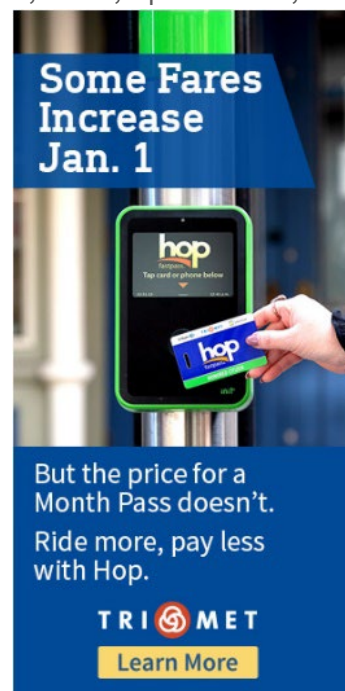


FIGURE 1-3: NOTICE TO RIDERS OF 2024 FARE CHANGE

on Accessible Transportation and included email, on-site signage and an online survey. After a pilot at one station starting in 2023, the program was improved and added to two additional stations in spring 2025.

- Closure of Skidmore Fountain MAX Station. The closure of this station, which is two blocks from the next station, was proposed in 2018, as part of an effort to shorten travel times for people riding through downtown Portland. That proposal was shelved in response to concerns from nearby businesses, but revived again in 2024, after boardings and alightings at the station remained low and development in the surrounding area failed to occur. Outreach in 2024 included email, direct mail, open houses, on-site signage, and social and earned media. Feedback largely favored the closure, which is now scheduled for August 2025.
- Replacing late-night MAX trips with bus service. Adding night buses across MAX lines and moving late-night/early-morning MAX trips to those buses allows for more overnight maintenance projects on the MAX system, reducing service disruptions. In early 2024, outreach on this proposal invited comments via on-site signage and through customer service staff speaking with late-night riders. Feedback was largely positive, and the change was implemented in August 2024.
- Miscellaneous MAX improvements. TriMet reached out to riders, neighbors and the general public about various projects to maintain and improve the MAX system. These efforts include email and direct mail, on-board outreach, social and earned media, discussion with community groups, and other communications. Projects included:
 - I-84 Clean Up (Summer 2024)
 - Stark/Burnside MAX Improvements (Spring 2024)
 - SW 11th Ave & Morrison MAX Improvements (Fall 2024)
 - East Burnside MAX Improvements (Spring 2025)
 - Type 6 EMI Testing (electromagnetic interference testing — Spring 2024)

Language Access 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. TriMet recently updated our Language Access Plan and Implementation Schedule (LAP) after an extensive review of the LEP populations in the TriMet service district and their needs.

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).

The LAP is built on two strategic pathways:

1. **Sustaining core practices** by continuing proven programs that address language access needs across the region.
2. **Expanding customer focus** by more deeply investing in four areas: language assistance services, notices to multilingual communities, monitoring and evaluation, and staff training.

This plan continues to guide TriMet as to how to best serve LEP populations and is provided as Attachment F.

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 updated our Four Factor Analysis in spring 2025, relying on a variety of national and local data sources.

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.

LEP population figures derived from the US Census Bureau American Community Survey (2019-2023) are provided in Table 1-2. LEP persons comprise approximately 7% of the TriMet service district population, with Spanish as the most commonly spoken language (46% of the LEP population and 3.3% of the TriMet district population as a whole).

The top five languages (Spanish, Vietnamese, Chinese, Russian and Korean) identified mirror the top five languages identified in TriMet's 2019 Four Factor Analysis. These top five languages comprise about 76% of the total LEP population.

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.

Additionally, an updated map depicting where LEP populations are concentrated in relation to the TriMet service district is provided in [Chapter V: Demographic Analysis](#). Notably, LEP populations are largely concentrated in the western and eastern parts of the service area.

TABLE 1-2: LANGUAGES SPOKEN BY LEP PERSONS AGE 5 AND OLDER IN TRIMET SERVICE DISTRICT

Language Spoken at Home	LEP Population Estimate	% of Total Population	% of LEP Population
Spanish	51,401	3.3%	45.9%
Vietnamese	13,144	0.8%	11.7%
Chinese (Cantonese, Mandarin)	11,293	0.7%	10.1%
Russian	5,387	0.3%	4.8%
Korean	3,325	0.2%	3.0%
Ukrainian	2,761	0.2%	2.5%
Arabic	2,485	0.2%	2.2%
Japanese	1,766	0.1%	1.6%
Tagalog	1,628	0.1%	1.5%
Persian/Farsi	1,234	0.1%	1.1%
Other (e.g., Romanian, Somali)	17,557	1.1%	15.7%
Total	112,630	7.2%	

Sources: TriMet GIS, Metro Regional Land Information System and US Census ACS Tables: 2019-2023 (5-Year Estimates).

Continued Language Services

The TriMet website includes a menu of 14 languages to view information (English, Spanish, Vietnamese, Korean, Russian, Chinese, Ukrainian, Japanese, Romanian, Tagalog, Khmer, Somali, Farsi and Somali), including a trip planning and vehicle tracking tool in the first six aforementioned languages. Additionally, any customers can access language assistance by calling TriMet Customer Service.

TriMet publishes a “How to Ride” brochure into all safe harbor languages and posts multilingual channel cards on TriMet vehicles (see Figures 1-4 through 1-7) that communicate vital customer information. Additionally, the LEP program continues to coordinate with our agency’s outreach efforts regarding budget, service changes, fare changes and construction projects to carry out targeted outreach to LEP communities that would be affected by proposed changes.

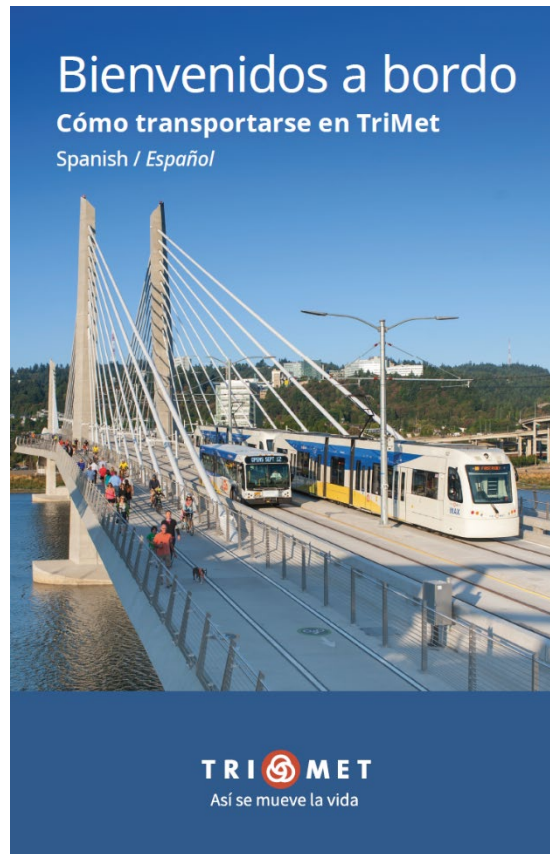


FIGURE 1-4: SPANISH VERSION OF TriMet'S
HOW TO RIDE BROCHURE



Si necesita interprete, llame al
 Nếu cần trợ giúp về thông dịch xin gọi
 如需语言帮助请致电
 Для службы языковой поддержки
 언어 통역이 필요하시면, 으로 전화 하시면 됩니다

503-238-7433

FIGURE 1-5: LANGUAGE ASSISTANCE CHANNEL CARD



Save Up to 72%

If you're 65+, have a disability or qualify based on income, you can save more with TriMet's reduced fares.

Si tienes más de 65 años, tienes una discapacidad o calificas según tus ingresos, puedes ahorrar hasta un 72% en tu pasaje de TriMet.

Если вам исполнилось 65 лет, у вас имеются ограниченные возможности здоровья или вы отвечаете требованиям дохода, вы можете сэкономить до 72%, пользуясь льготными тарифами организации TriMet.

如果您年满65岁,有残疾或基于收入符合条件,您可以通过TriMet的优惠票价最多节省72%。

Nếu quý vị 65 tuổi trở lên, bị thương tật hoặc có thu nhập hợp tiêu chuẩn, quý vị có thể tiết kiệm đến 72% với vé giảm giá của TriMet.

65세 이상이거나 장애가 있거나 소득에 따라 자격이 있는 경우, TriMet의 할인 요금으로 최대 72%까지 절약할 수 있습니다.



trimet.org/reduced

FIGURE 1-6: MULTILINGUAL HONORED CITIZEN FARE PROGRAMS CHANNEL CARD



Rules for Riding

- Don't threaten or intimidate riders or operators.
No amenace ni intimide a otros pasajeros ni al conductor.
- In the priority seating area, move for seniors and people with disabilities.
En el área de prioridad, ceda el asiento a personas de edad avanzada y personas con discapacidad.
- 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.
- Valid and correct fare is required.
Se requiere boleto apropiado y válido.
- 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.



FIGURE 1-7: ENGLISH/SPANISH RULES FOR RIDING CHANNEL CARD

Board Membership and Recruitment

TriMet relies on the oversight and guidance from volunteers at every level of our agency's structure. The Board of Directors includes representatives of districts spanning the TriMet service area. The General Manager and Board also seek guidance from the Committee on Accessible Transportation (CAT). The racial/ethnic composition of the Board and CAT is shown in Table 1-3.

TABLE 1-3: TRIMET BOARD MEMBERSHIP BY RACE/ETHNICITY

	TriMet Service Area Population*	Board of Directors	Committee on Accessible Transportation
Total (#)	1,648,360	7	14
American Indian/Alaska Native	<1%	0%	7%**
Asian	9%	29%	7%
Black/African American	4%	29%	14%
Hispanic/Latino	14%	0%	7%**
Native Hawaiian/Pacific Islander	1%	0%	0%

	TriMet Service Area Population*	Board of Directors	Committee on Accessible Transportation
White (Non-Hispanic/Latino)	66%	43%	71%
Other	7%	0%	0%

**Figures do not add up to 100% due to rounding.*

***One member of the CAT identifies as both American Indian/Alaska Native and Hispanic/Latino.*

Source: US Census American Community Survey 2019-2023 (5-Year Estimates) Table B03002

Board and Committee Recruitment

TriMet’s Board of Directors is made up of seven members appointed by the Governor of Oregon. 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 **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 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. The membership recruitment process includes:

1. Notification to service agencies and organizations that serve seniors and/or people with disabilities of all races;
2. 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 a local newspaper.

Subrecipient Monitoring

As a designated recipient of FTA funds, TriMet regularly passes through funding to subrecipients and is responsible for ensuring their compliance with FTA Title VI requirements. Primary monitoring is conducted annually by the Senior Grants Compliance Analyst within the Grants Development and Compliance Department. However, ongoing oversight is also the responsibility of Project Managers overseeing the applicable Federal award.

While basic Title VI requirements are reviewed annually using FTA’s Triennial Review worksheet, a risk-based approach allows certain plan elements to be reviewed once every three years.

To support compliance, the Grants team developed a **Title VI Subrecipient Guide** (see Attachment G) and a **Title VI Subrecipient template** that tracks each subrecipient’s plan components, update history and applicability of additional requirements — such as System-wide Service Standards (for fixed-route providers) or enhanced data reporting.

If compliance issues are identified, the Senior Grants Compliance Analyst may conduct follow-up procedures and consult TriMet’s Title VI & Public Access Programs Manager. The Analyst is also responsible for submitting subrecipient Title VI information to the FTA upon request.

TriMet supports subrecipients through ongoing communications, training (as requested) and access to internal subject matter experts. Past support has included providing demographic data to help update public participation and language assistance plans.

Facilities Siting and Construction

TriMet’s process for conducting Title VI analyses related to facility siting and construction follows the guidance provided in the FTA Circular/Title 49 CFR.

Since the last Title VI Program submission in 2022, TriMet has not purchased or constructed on any property that would require this analysis.

Major Service and Fare Change Title VI Analyses

Consistent with FTA guidance, TriMet evaluates proposals for Major Service Changes and fare changes for potential Disparate Impacts and Disproportionate Burdens.

TriMet has conducted Title VI Analyses for the following since the 2022 Title VI Program submittal:

- May 2023 Service Change
- 2024 Fare Increase
- FY2024 Annual Service Plan
- FY2025 Annual Service Plan

The full reports, as well as corresponding documentation of the TriMet Board’s consideration, awareness and approval of each, are compiled and provided as Attachment H.

Part II: Title VI Policies

Policy updates from TriMet's 2022 Title VI Program

- Adding the combination of two or more transit lines into a single line to the Major Service Change definition.
- Specifying that cumulative service changes over three years reaching the 15% threshold qualify as Major Service Changes only in the event of service reductions.
- Increasing the single transit line Disparate Impact and Disproportionate Burden analyses thresholds from 3 to 5 percentage points to better capture real world differences and align with peer practice.
- Removing single transit line Disparate Impact and Disproportionate Burden analysis of service improvements to avoid the implication that increasing service on lines traveling through non-minority, non-low-income communities is not Title VI-compliant. The system-level analysis remains to ensure fair distribution of benefits of overall service proposals to minority and low-income communities.
- Simplifying the system level Disparate Impact and Disproportionate Burden analyses methodology and thresholds to mirror the single line analysis (i.e., comparing minority and low-income populations impacted to the percentage of the overall TriMet service district's population they comprise, with a 5 percentage point difference threshold). The previous policy compared the portion of the minority and low-income populations impacted by the combined Major Service Changes to the portion of the non-minority and non-low-income populations impacted, with a 20% difference threshold.
- Clarifying the fare change analysis language to better describe the intended policy.

This section provides the following policies, as approved by the TriMet Board:

1. Major Service Change Policy
2. Disparate Impact Policy
3. Disproportionate Burden Policy

These policies and the thresholds they establish are informed by community feedback gathered through a variety of outreach methods over the past 12+ years, as well as lessons learned by staff who have conducted Title VI analyses.

Major Service Change Policy

All changes in service meeting the definition of “Major Service Change” are subject to a Title VI Analysis prior to Board approval of the service change. A Title VI Analysis will be completed for all Major Service Changes and will be presented to the TriMet Board of Directors for its awareness and 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 any of the following:

1. A change to **15%** or more to a line’s:
 - a. **Route miles.** This includes routing changes where route miles are either increased or reduced (i.e. route changes),

OR
 - b. **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
 - c. **Cumulative frequency** of service on a daily basis for the day of the week for which a change is made as measured by revenue hours.
2. A single transit line is **split** into two or more transit lines.
3. Two or more transit lines are **combined** into a single line.
4. A **new transit route** is established as defined in the Introduction.
5. A **transit route is eliminated** or retired from service.

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

1. Within a single service proposal,

OR
2. Due to a cumulative effect of routing, span or frequency changes over the three years prior to the analysis (service reductions only).

The following service changes are exempted:

1. **Standard seasonal variations** in service or reroutes due to construction projects are not considered Major Service Changes.
2. **In an emergency situation**, a service change may be implemented immediately without a Title VI Analysis being completed. A Title VI 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 a Title VI Analysis being completed. A Title VI 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.

Adverse Effects vs. Benefits

TriMet analyzes both adverse effects resulting from major service reductions and benefits resulting from major service improvements.

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.

Disparate Impact Policy

The Disparate Impact Policy establishes a threshold and process for determining whether a given action has a potential unfair and adverse effect on minority populations.

In the event the proposed action has an adverse impact that affects minority populations at a level that exceeds the thresholds established in the adopted Disparate Impact Policy, or that unfairly denies minority populations the benefits of the service change, the finding is considered a potential Disparate Impact. Given a potential Disparate Impact, TriMet will evaluate whether there is an alternative that would serve the same objectives but more fairly. 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.

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.

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.

Service Reductions

TriMet considers many factors when faced with a need to reduce service, including ridership, geographic coverage and populations served. To ensure minority populations are not unfairly affected by these reductions, TriMet conducts a two-part analysis, using a **Disparate Impact threshold of 5%**:

1. **Single transit line analysis:** If the minority population living in the transit line's service area is at least 5 percentage points *higher* than the minority population in the TriMet service area as a whole (currently 34%), the line is flagged for a potential Disparate Impact.
2. **System-level analysis:** Considering all major service reductions combined, if the minority population living in the these transit lines' service areas is at least 5 percentage points *higher* than the service area's's minority population as a whole (currently 34%), the overall effect of changes is flagged for a potential Disparate Impact.

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

Service Improvements

TriMet considers many factors when planning service improvements, including ridership, geographic coverage and populations served. To ensure minority populations are not denied the benefits of these improvements, TriMet conducts a two-part analysis:

1. **Single transit line analysis:** A major service improvement to a transit line is flagged for a potential Disparate Impact if the improvement is linked to other service changes that have disproportionate and adverse effects on minority populations.
 - For example, if TriMet plans to re-route a transit line and double its service, but the re-route removes service from a predominantly Hispanic/Latino neighborhood that does not have alternative service, this could be considered a potential Disparate Impact.
2. **System-level analysis:** Considering all major service improvements combined, if the minority population living in the these transit lines' service areas is at least 5 percentage points *lower* than the service area's minority population as a whole (currently 34%), the overall effect of changes is flagged for a potential Disparate Impact.

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

Responding to Findings

Upon determination of a potential Disparate Impact, TriMet will either:

1. Alter the service proposal to avoid, minimize or mitigate potential Disparate Impacts,

OR
2. 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 adverse effects would impact a 10 percentage point greater share of minority riders than non-minority riders (e.g., 45% of minority riders vs. 35% of non-minority riders). Where potential adverse impacts are identified, TriMet will provide a meaningful opportunity for public comment on any proposed mitigation measures, including any less discriminatory alternatives that may be available.

Disproportionate Burden Policy

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

In the course of performing a Title VI 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.

In the event the proposed action has an adverse effect on 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 fair 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 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.

Service Reductions

TriMet's conducts a two-part analysis of major service reductions, using a **Disproportionate Burden threshold of 5%**:

1. **Single transit line analysis:** If the low-income population living in the transit line's service area is at least 5 percentage points *higher* than the low-income population in the TriMet service area as a whole (currently 16%), the line is flagged for a potential Disproportionate Burden.
2. **System-level analysis:** Considering all major service reductions combined, if the low-income population living in the these transit lines' service areas is at least 5 percentage points *higher* than the service area's low-income population as a whole (currently 16%), the overall effect of changes is flagged for a potential Disproportionate Burden.

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

Service Improvements

TriMet considers many factors when planning service improvements, including ridership, geographic coverage and populations served. To ensure low-income populations are not denied the benefits of these improvements, TriMet conducts a two-part analysis:

1. **Single transit line analysis:** A major service improvement to a transit line is flagged for a potential Disproportionate Burden if the improvement is linked to other service changes that have disproportionate and adverse effects on low-income populations.
 - For example, if TriMet plans to re-route a transit line and double its service, but the re-route removes service from a Department of Human Services office that is not served by another line, this could be considered a potential Disproportionate Burden.
2. **System-level analysis:** Considering all major service improvements combined, if the low-income population living in the these transit lines' service areas is at least 5 percentage points *lower* than the service area's low-income population as a whole (currently 16%), the overall effect of changes is flagged for a potential Disproportionate Burden.

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

Responding to Findings

Upon determination of a potential Disproportionate Burden, TriMet will either:

1. Alter the service proposal to avoid, minimize or mitigate potential Disproportionate Burdens,

OR

2. 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 adverse effects would impact a 10 percentage point greater share of low-income riders than non-low-income riders (e.g., 32% of low-income riders vs. 22% of non-low-income riders). Where potential adverse impacts are identified, TriMet will provide a meaningful opportunity for public comment on any proposed mitigation measures, including any less discriminatory alternatives that may be available.

Public Participation Informing Title VI Analysis

TriMet has engaged riders multiple times to inform the Major Service Change, Disparate Impact and Disproportionate Burden policies since the FTA published Circular 4702.1B in 2012, including focus groups, open houses and surveys. This has resulted in making thresholds more sensitive as well as expanded considerations to include access to jobs, education, food, health care, parks, public recreation and green spaces when performing a Title VI analysis. Moreover, riders support a population-based approach (i.e., looking at the low-income and minority population living by transit lines proposed for changes was a good way to measure potential impacts).

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.

Part III: System-Wide Service Policies and Standards

TriMet has established standards and policies as set forward in FTA Circular 4702.1B.

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. Part IV: Service Monitoring provides the analysis of performance/outcomes for each respective standard and policy, comparing the service and amenities provided for minority and non-minority populations, and low-income and non-low-income populations, respectively.

Standard — Vehicle Loads

Standards for passenger capacity are used to determine if a bus or train is overcrowded. Table 3-1 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 3-1: VEHICLE CAPACITIES BY MODE AND TYPE

Vehicle Type	Maximum Achievable Capacity	Seated	Standing	Maximum Load Factor
29-ft. Bus	40	23	17	1.7
40-ft. Bus	56	39	17	1.4
60-ft. Bus	91	46	45	2.0
MAX 1-Car Train	133	64	69	2.1
MAX 2-Car Train	266	128	138	2.1
WES 1-Car Train	70	70	0	1.0
WES 2-Car Train	146	146	0	1.0

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;
- Streets that are friendly to pedestrians and transit service;
- A high proportion of transit dependent population and activities; and/or

- Meet other criteria specified in TriMet’s Service Guidelines Framework.

Seventeen 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.

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 68% of the population of the TriMet service district (about 1,088,000 of a total of 1.6 million). Among minority populations living in the TriMet service area, 75% are served by at least one Frequent Service line, while 88% of people living with a low-income are served by at least one Frequent Service line.

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% 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 the population in TriMet’s service district and is determined by mode: for bus, MAX and WES, respectively. The calculation of distance is based on June 2025 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 service district with service availability should be no less than the share of non-minority populations with service availability.

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 Classification 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 Classification Guidelines⁵ (Figure 3-1) 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.

Stop Type	Illustration	Externally Managed Features	Potential Bus Stop Features	Stop Conditions & Usage
Under-Developed		No clear pedestrian access; no logical, safe street crossing; constrained topography	No pavement; inadequate shoulder; visibility blocked; poor lighting; insufficient ADA clearances; exposure to weather/traffic; shared pole	Poor, or lack of, supporting land uses; few or no boarding rides; closely spaced with another stop
Basic		Legal street crossing (corner ramps); sidewalk or safe shoulder access	Pavement meets ADA clearances; most bus stop signs on dedicated poles; free standing bench	All stops meeting siting criteria
Level 1		<i>Preceding features plus:</i> sidewalk connections; curb extensions; crosswalks	<i>Preceding features plus:</i> Standard (A or B) shelter (larger if justified); shelter lighting; rear door landing when physically possible	High use stops (50+ Ons/day); significant employer program participant; apartments; institutions; hospitals; shopping centers; major business; stops with significant usage by riders who are disabled or elderly
Level 2		<i>Preceding features plus:</i> transit plazas and active public space	<i>Preceding features plus:</i> double B or higher capacity shelter; printed schedule; trash can; additional free standing bench	Major stops (150+ Ons/day); transfer points; stops with significant bus ramp usage
Level 3		<i>Preceding features plus:</i> concession or nearby shop(s); landscaping; robust public and pedestrian infrastructure	<i>Preceding features plus:</i> high capacity shelter; free standing bench(s); bike storage lockers; artwork elements	High Capacity Stops (250+ Ons/day) Bus Rapid Transit service; transit centers; major transfer hubs; transit mall

FIGURE 3-1: BUS STOP CLASSIFICATION GUIDELINES

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 feet in length with a mid-armrest.

⁵ As of writing, these guidelines are being updated.

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 been provided by cover mounted to adjacent buildings. Stand-alone shelters vary in size. Two stand-alone shelters are 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. This is 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, security and other considerations 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 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, which governs the design of light rail projects and is also a key reference for Commuter Rail, contains the bulk of requirements for customer information items such as signage and other visuals. 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 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 and at transit centers where multiple bus lines converge, as well as rail stations 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 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. These displays are placed at all bus stops without BCIDs or variable stop ID signs.

Digital displays: Digital displays containing real-time bus arrival information are located throughout the system at over 350 stops and counting.

Light and Commuter Rail

Pylon information displays: Two-side or four-sided displays 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 displays are placed at all MAX and WES stations.

Digital displays: Displays placed along rail/fixed guideway platforms at all stations.

Vehicle Assignment

Assigning vehicles to routes involves several considerations. Vehicles are domiciled at each of the three bus operations facilities (referenced as Center, Powell and Merlo). 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 bus fleet, as of August 2025, includes 668 buses, all of which are low-floor and are equipped with automated stop announcement systems.

Bus assignments also take into account the various lengths of buses, 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 operations facilities (referenced as 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 148 vehicles of which 132 are low-floor. All cars are equipped with air conditioning. High-floor cars are always paired with a low-floor car to provide ADA accessibility.

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 additional cars (a "married pair") were built in 1952 and 1953, and they were placed in operation in 2011.

In regard to assessing the results of TriMet's vehicle assignment practices in the context of Title VI, the policy is that the average age of vehicles on "minority lines" should be no more than the average age of vehicles on "non-minority" lines. Additionally, TriMet has set the expectation that the average age of vehicles on "low-income lines" should be no more than the average age of vehicles on "non-low-income" lines.

As of August 2025, TriMet operates 34 completely electric buses serving lines 6, 20 and 62, which are considered minority lines. As TriMet looks to phase in all zero-emissions buses, the assignment strategy will consider how these vehicles are deployed throughout the service area to ensure fair distribution.

From the Title VI Circular

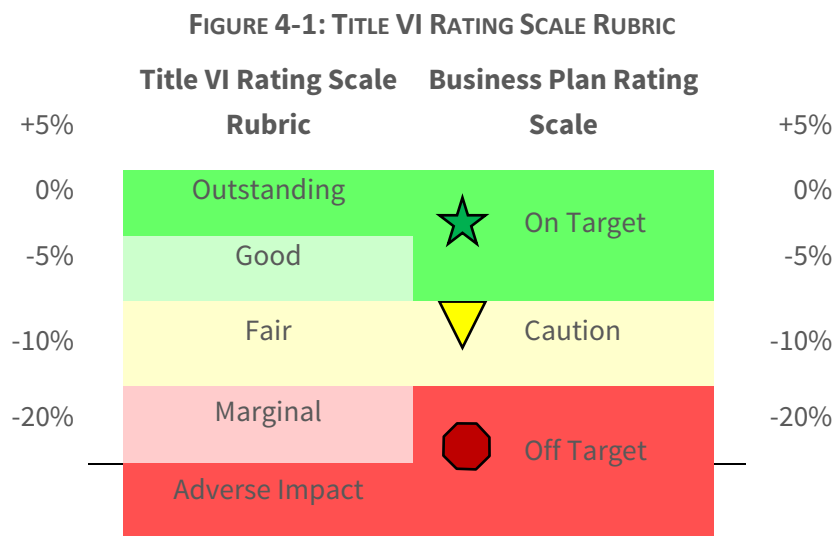
Vehicle assignment refers to the process by which transit vehicles are placed into service in depots and on routes throughout the transit provider's system. Policies for vehicle assignment may be based on the age of the vehicle, where age would be a proxy for condition.

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.

As shown in Figure 4-1, the Title VI rating scale rubric ranges between “outstanding,” “good,” “fair,” “marginal” and “adverse impact”. To receive an “outstanding” score, access or service distribution for minority and low-income must be good as or better than non-minority and higher income for each measure.

A performance finding within the 5% threshold is considered “good.” The target for TriMet’s Business Plan objective is within 5% or better. A greater than 5% but less than 10% difference equates to “fair.” Above the 10% threshold but within 20% would result in a “marginal” score. A marginal score would be flagged as a caution and area for improvement. Any measure that exceeds 20% would indicate “adverse impact” and would result in a system-wide Disparate Impact and/or Disproportionate Burden finding per the FTA.



TriMet monitors the following service and performance metrics:

- “Minority” and “non-minority” lines
- “Low-income” and “non-low-income” lines
- Service frequency and span
- On-time performance

- Vehicle loads
- Service availability
- Stop amenities
- Vehicle assignment

Minority & Non-minority Lines

“Minority” lines, as defined by the FTA, are lines that provide at least one-third of their service in block groups that are above-average minority population for the TriMet service district. “Non-minority” lines are all others. Currently, TriMet operates a total of 86 lines, including 79 bus lines, 5 MAX light rail lines and 1 WES commuter rail line. Of these, 48 bus lines, 3 MAX lines and WES commuter rail are considered minority lines. As of summer 2025, minority lines account for 62% of TriMet system service (measured by revenue hours). 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.

Low-income & Non-low-income Lines

“Low-income” lines, as defined by the FTA, are lines that provide at least one-half of their service in block groups that are above-average low-income population. “Non-low-income” lines are all others. Currently, 46 bus lines, 5 MAX lines and the WES commuter rail are considered low-income lines and accounted for 78% of TriMet’s service in the summer of 2025. As of summer 2025, low-income lines accounted for 61% of TriMet system service (measured by revenue hours). TriMet generally aligns service with mobility needs and ridership, thus lines serving areas with above-average low-income populations typically have higher ridership and therefore a higher overall level of service than non-low-income lines.

Service Frequency & Span

TriMet analyzes service frequency (how often the service arrives) and span (hours of service) for each mode (bus, MAX, WES), day of service (weekday, weekend) and line classification (minority/non-minority and low-income/non-low-income).

Minority/Non-minority Comparison

The analysis for summer 2025 service, shown in Tables 4-1 and 4-2, finds **no Disparate Impact** in terms of frequency and span:

1. Average scheduled frequency is greater on minority lines than service on non-minority lines across all modes and days, with one exception: the two non-minority MAX lines run more frequently in the evenings than the minority MAX lines, both on weekdays and weekends.
2. Average scheduled span is greater on minority lines than non-minority lines, across all modes and days.

TABLE 4-1: FREQUENCY AND SPAN OF SERVICE (WEEKDAYS)

MINORITY AND NON-MINORITY TRANSIT LINES BY MODE

SUMMER 2025

WEEKDAY SERVICE		TriMet System		Bus		MAX Light Rail		WES Commuter Rail (Minority Line)
		Minority	Non-minority	Minority	Non-minority	Minority	Non-minority	
Lines in Service		52	33	48	31	3	2	1
Average Frequency (minutes)	Early Morning	0:31	0:47	0:32	0:48	0:19	0:30	0:45
	Day	0:30	0:46	0:32	0:47	0:15	0:15	0:45
	Evening	0:33	0:39	0:34	0:40	0:18	0:15	0:45
	Night	0:35	0:42	0:36	0:44	0:21	0:23	N/A
Span (hours)		16.3	14.9	15.9	14.5	22.1	20.7	6.0

*Per the Federal Transit Administration, “minority” lines serve routes that provide at least 1/3 of their service in block groups that are above-average minority population for the TriMet service district. “Non-minority” lines are all others

TABLE 4-2: FREQUENCY AND SPAN OF SERVICE (SATURDAYS AND SUNDAYS)

MINORITY AND NON-MINORITY TRANSIT LINES BY MODE

SUMMER 2025

SATURDAY & SUNDAY SERVICE		TriMet System		Bus		MAX Light Rail		WES Commuter Rail (Minority Line)
		Minority	Non-minority	Minority	Non-minority	Minority	Non-minority	
Lines in Service		38	21	35	19	3	2	0
Average Frequency (minutes)	Early Morning	0:31	0:38	0:32	0:38	0:22	0:31	N/A
	Day	0:29	0:36	0:30	0:37	0:15	0:17	N/A
	Evening	0:32	0:38	0:34	0:39	0:20	0:15	N/A
	Night	0:36	0:38	0:37	0:41	0:25	0:26	N/A
Span (hours)		16.7	15.6	16.4	15.3	22.1	20.7	N/A

*Per the Federal Transit Administration, “minority” lines serve routes that provide at least one-third of their service in block groups that are above-average minority population for the TriMet service district. “Non-minority” lines are all others.

Low-income/Non-low-income Comparison

The analysis for summer 2025 service, shown in Tables 4-3 and 4-4, finds **no Disproportionate Burden** in terms of service frequency and span:

1. Average scheduled frequency is greater on low-incomes lines than non-low-income lines across all modes and days.
2. Average scheduled span is greater on low-incomes lines than non-low-income lines across all modes and days.

TABLE 4-3: FREQUENCY AND SPAN OF SERVICE (WEEKDAYS)

LOW-INCOME AND NON-LOW-INCOME TRANSIT LINES BY MODE

SUMMER 2025

WEEKDAY SERVICE		TriMet System		Bus		MAX Light Rail		WES Commuter Rail (Low-income Line)
		Low- income	Non-low- income	Low-income	Non-low- income	Low- income	Non-low- income	
Lines in Service		52	33	46	33	5	0	1
Average Frequency (minutes)	Early Morning	0:33	0:42	0:33	0:42	0:27	N/A	0:45
	Day	0:28	0:56	0:29	0:56	0:15	N/A	0:45
	Evening	0:29	0:40	0:31	0:40	0:15	N/A	0:45
	Night	0:35	0:41	0:38	0:41	0:20	N/A	N/A
Span (hours)		16.9	13.9	16.4	13.9	21.5	N/A	6.0

*Per the Federal Transit Administration, “low-income” lines serve routes that provide at least one-half of their service in block groups that are above-average low-income population for the TriMet service district. “Non-low-income” lines are all others.

TABLE 4-4: FREQUENCY AND SPAN OF SERVICE (SATURDAYS AND SUNDAYS)

LOW-INCOME AND NON-LOW-INCOME TRANSIT LINES BY MODE

SUMMER 2025

		TriMet System		Bus		MAX Light Rail		WES Commuter Rail (Low-income Line)
SATURDAY & SUNDAY SERVICE		Low- income	Non-low- income	Low-income	Non-low- income	Low- income	Non-low- income	
Lines in Service		40	19	35	19	5	0	0
Average Frequency (minutes)	Early Morning	0:34	0:42	0:35	0:42	0:30	N/A	N/A
	Day	0:26	0:39	0:28	0:39	0:17	N/A	N/A
	Evening	0:29	0:37	0:31	0:37	0:15	N/A	N/A
	Night	0:35	0:43	0:36	0:43	0:24	N/A	N/A
Span (hours)		16.8	15.4	16.4	15.4	21.5	N/A	N/A

On-time Performance

TriMet 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.

Minority/Non-minority Comparison

The on-time performance Title VI analysis for spring 2025 service, shown in Table 4-5, finds **no Disparate Impact** on minority riders:

- 1. Bus on-time performance is similar between minority and non-minority lines (no more than a 1% difference). This is within the 0-5% “outstanding” range on the Title VI Rubric.
- 2. MAX on-time performance is similar between minority and non-minority lines (no more than a 3% difference). This is within the 0-5% “outstanding” range on the Title VI Rubric.
- 3. On-time performance for WES, a minority line, is 99%.

TABLE 4-5: SPRING 2025 ON-TIME PERFORMANCE COMPARISON

MINORITY AND NON-MINORITY LINES

		Avg. % On-Time*		
Mode of Service	Day	Minority Lines	Non-Minority Lines	Difference; Minority to Non-Minority +/-(-)
Bus	Weekday	86%	86%	0%
	Saturday	85%	86%	(1%)
	Sunday	91%	91%	0%
MAX Light Rail	Weekday	82%	83%	(1%)
	Saturday	79%	79%	0%
	Sunday	78%	81%	(3%)
WES Commuter Rail	Weekday	99%	N/A	N/A

* Weighted by hours in service. For 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 measure at time points. 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.”

Low-income/Non-low-income comparison

The on-time performance Title VI analysis for spring 2025 service, as shown in Table 4-6, finds **no Disproportionate Burden** on low-income riders:

1. On-time performance is similar between low-income and non-low-income lines (no more than 2% difference). This is within the 0-5% “outstanding” range on the Title VI Rubric.
2. Average on-time performance for MAX, all low-income lines, ranges from 79% on weekends to 82% on weekdays.
3. On-time performance for WES, a low-income line, is 99 %.

TABLE 4-6: SPRING 2025 ON-TIME PERFORMANCE COMPARISON

LOW-INCOME AND NON-LOW-INCOME LINES

		Avg. % On-Time*		
Mode of Service	Day	Low-income Lines	Non-low-income Lines	Difference; Low-income to Non-low-income +/-
Bus	Weekday	86%	86%	0%
	Saturday	85%	87%	(2%)
	Sunday	91%	92%	(1%)
MAX Light Rail	Weekday	82%	N/A	N/A
	Saturday	79%	N/A	N/A
	Sunday	79%	N/A	N/A
WES Commuter Rail	Weekday	99%	N/A	N/A

*Weighted by hours in service. For 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 measure at time points. 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.”

Service Availability (Proximity to Service)

TriMet considers the population living within one half-mile of bus stops and/or rail stations as having service available. Table 4-7 shows population counts and percentages of those within this half-mile range by minority and income status. This is also delineated by type of service, i.e. bus, MAX and WES; and Frequent Service bus and MAX.

Minority/Non-minority Comparison

The service availability analysis for summer 2025, as shown in Table 4-8, finds **no Disparate Impact** on minority riders. A greater percentage of minority populations are located within one-half mile of all modes of service than non-minority populations, including 76% who live near a Frequent Service bus or MAX line (compared to 69% for the non-minority population).

Low-income/Non-low-income Comparison

The service availability analysis for summer 2025, as shown in Table 4-9, finds **no Disproportionate Burden** on low-income riders. A greater percentage of low-income populations are located within one-half-mile of all modes of service than non-low-income populations, including 89% who live near a Frequent Service bus or MAX line (compared to 67% for the non-low-income population).

TABLE 4-7: PROXIMITY TO TRIMET SERVICE

		TriMet service district		% within 1/2 mile* of...			Frequent Service	
		Totals (#)	Totals (%)	Bus	MAX	WES	Bus	Bus & MAX
Race/ethnicity	Total	1,648,360	100.0%	87.0%	16.3%	0.9%	54.7%	71.0%
	All Minorities	563,067	34.2%	88.0%	18.6%	1.3%	57.0%	75.7%
	White (Non-Hispanic)	1,085,294	65.8%	86.5%	15.1%	0.7%	53.5%	68.7%
Income	Total population with known income**	1,627,239	100.0%	87.0%	16.2%	1.0%	54.6%	70.8%
	Low-income	266,534	16.4%	93.3%	22.6%	1.3%	66.8%	89.3%
	Above low-income	1,360,705	83.6%	85.7%	15.0%	0.9%	52.2%	67.2%

Sources: TriMet GIS, Metro Regional Land Information System and US Census American Community Survey Tables: 2019-2023 (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 December 2024 stop and station locations.

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

Vehicle Loads

TriMet monitors vehicle loads to determine whether buses and trains are overcrowded and, if so, whether minority and/or low-income riders are experiencing crowding at disproportionate levels.

Minority/Non-minority Comparison

The vehicle load analysis for spring 2025 service, as shown in Table 4-8, finds **no Disparate Impact** on minority riders — across all modes, time periods and line classifications (i.e., minority vs. non-minority), average load/seat ratios range from a low of 23% to a high of 51%. This is well below capacity for each vehicle.

TABLE 4-8: SPRING 2025 VEHICLE LOADS COMPARISON

MINORITY AND NON-MINORITY LINES

Vehicle Type	Time Period	Minority Lines		Non-Minority Lines	
		Avg. Load/Seat Ratio	Avg. Maximum Load	Avg. Load/Seat Ratio	Avg. Maximum Load
Bus (23, 39, or 46 seats)	AM Peak*	47%	18	42%	16
	PM Peak*	51%	20	40%	16
MAX Light Rail (64 or 128 seats)	AM Peak	37%	48	37%	48
	PM Peak	48%	63	36%	46
WES Commuter Rail (146 seats)	All	23%	34	N/A	N/A

*AM Peak = 7:00 - 8:59 am; PM Peak = 4:00 – 5:59pm

**Weighted by hours in service.

Low-income/Non-low-income Comparison

The vehicle load analysis for spring 2025 service, as shown in Table 4-9, finds **no Disproportionate Burden** on low-income riders — across all modes and time periods, average load/seat ratios range from a low of 23% to a high of 52%. This is well below capacity for each vehicle.

TABLE 4-9: SPRING 2025 VEHICLE LOADS COMPARISON

LOW-INCOME AND NON-LOW-INCOME LINES

Vehicle Type	Time Period	Low-income Lines		Non-low-income Lines	
		Avg. Load/Seat Ratio	Avg. Maximum Load	Avg. Load/Seat Ratio	Avg. Maximum Load
Bus (23, 39, or 46 seats)	AM Peak*	47%	19	40%	15
	PM Peak*	52%	20	38%	15
MAX Light Rail (64 or 128 seats)	AM Peak	37%	48	N/A	N/A
	PM Peak	46%	60	N/A	N/A
WES Commuter Rail (146 seats)	All	23%	34	N/A	N/A

*AM Peak = 7:00 - 8:59 am; PM Peak = 4:00 – 5:59pm

**Weighted by hours in service.

Stop Amenities

TriMet analyzes the distribution of stop amenities in the TriMet system (shelters, seating, waste receptacles, et al.) in order to identify any potential disparities.

Minority/Non-minority Comparison

The stop amenity analysis for summer 2025, as shown in Table 4-10, finds **no Disparate Impact** on minority riders: 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 (60% compared to 56% of stops). This 4% difference is within the “outstanding” range on the Title VI Rubric.

TABLE 4-10: SUMMER 2025 STOP AMENITY COMPARISON

MINORITY AND NON-MINORITY LINES

Category of Amenity	Pct. of Stops with Amenity on Minority Lines	Pct. of Stops with Amenity on Non-Minority Lines	Difference; Minority to Non-Minority +/- (-)
Seating	39%	26%	13%
Lighting	56%	60%	(4%)

Category of Amenity	Pct. of Stops with Amenity on Minority Lines	Pct. of Stops with Amenity on Non-Minority Lines	Difference; Minority to Non-Minority +/-(-)
Elevators	<1%	<1%	0%
Digital Displays	12%	7%	5%
Shelters	22%	13%	9%
Signs, Maps and/or Schedules	87%	80%	7%
Waste Receptacles	18%	12%	6%

Low-income/Non-low-income Comparison

The stop amenity analysis for summer 2025, as shown in Table 4-11, finds **no Disproportionate Burden** on low-income riders: the percentage of stops containing each amenity on low-income lines exceeds the percentage for non-low-income lines in all categories examined with the exception of lighting, which is slightly higher for non-low-income lines (59% compared to 57% of stops). This 2% difference is within the “outstanding” range on the Title VI Rubric.

TABLE 4-11: SUMMER 2025 STOP AMENITY COMPARISON

LOW-INCOME AND NON-LOW-INCOME LINES

Category of Amenity	Pct. of Stops with Amenity on Low-Income Lines	Pct. of Stops with Amenity on Non-Low-Income Lines	Difference; Low-Income to Non-Low-Income +/-(-)
Seating	38%	26%	12%
Lighting	57%	59%	(2%)
Elevators	<1%	0%	<1%
Digital Displays	14%	4%	10%
Shelters	24%	8%	16%
Signs, Maps and/or Schedules	86%	80%	6%
Waste Receptacles	20%	8%	12%

Vehicle Assignment

The vehicle assignment analysis compares the average ages of TriMet vehicles serving minority, non-minority, low-income and non-low-income 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.

Minority/Non-minority Comparison

The vehicle assignment Title VI analysis for spring 2025 service, as shown in Table 4-12, finds **no Disparate Impact** on minority riders:

1. On average, buses serving minority lines are about 5 months newer than buses serving non-minority lines (8.4 years old vs. 8.8 years old, respectively).
2. On average, MAX vehicles serving minority lines are about 7 months newer than MAX vehicles serving non-minority lines (21.9 years old vs. 22.5 years old, respectively).
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.

TABLE 4-12: SPRING 2025 VEHICLE AGE COMPARISON

MINORITY AND NON-MINORITY LINES

Average Age of Vehicles (years)			
Mode of Service	Minority Lines	Non-Minority Lines	Difference; Minority to Non-Minority +/-
Bus	8.4	8.8	(0.4)
MAX Light Rail	21.9	22.5	(0.6)
WES Commuter Rail	Primary: 18.5 Spares: 73	N/A	N/A

Low-income/Non-low-income Comparison

The vehicle assignment Title VI analysis for spring 2025 service, as shown in Table 4-13, finds **no Disproportionate Burden** on low-income riders:

1. On average, buses serving low-income lines are over a year newer than buses serving non-low-income lines (8 years old vs. 9.2 years old, respectively).
2. MAX vehicles (all low-income lines) are 22.1 years old on average.
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.

TABLE 4-13: SPRING 2025 VEHICLE AGE COMPARISON

LOW-INCOME AND NON-LOW-INCOME LINES

Mode of Service	Average Age of Vehicles (years)		Difference; Low-income to Non-low-income +/-
	Low-income Lines	Non-low-income Lines	
Bus	8.0	9.2	(1.2)
MAX Light Rail	22.1	N/A	(0.6)
WES Commuter Rail	Primary: 15.5 Spares: 70.0	N/A	N/A

Summary of Findings: Service Monitoring

As summarized in Table 4-14, TriMet finds **no disparities in terms of performance that would indicate lesser service provision to minority or low-income populations.**

TABLE 4-14: SERVICE MONITORING RESULTS SUMMARY

Metric	Disparate Impact?	Disproportionate Burden?
Service Frequency & Span	NO	NO
On-time Performance	NO	NO
Service Availability	NO	NO
Vehicle Loads	NO	NO
Stop Amenities	NO	NO
Vehicle Assignment	NO	NO

Part V: Demographic Analysis

TriMet uses demographic data to assess fairness in distribution of services, facilities and amenities in relation to minority, low-income and limited English proficient (LEP) populations. Such data informs TriMet in the early stages of service, facilities and program planning, enabling 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.

This analysis relies on data from the following sources:

- 2019-2023 American Community Survey (ACS) — for population analysis
- 2025 TriMet Attitudes & Awareness Survey — for rider analysis

Current Service and Service Area

Service and Service Area in Figure 5-1 shows all TriMet bus and rail lines, differentiated by frequent service lines and standard service lines.

The maps shown in Figures 5-2 to 5-4 display the distribution of minority, low-income and LEP populations in relation to services throughout the TriMet service area.

Summary

- The TriMet service area's **minority population** is about 34%, an increase from 31% in 2022. Most areas with higher concentration of minority populations are distributed across the western, eastern and northern parts of the service area.
- The TriMet service area's **low-income population** is about 16%, which is a slight decrease from 17% in 2022. While low-income populations live throughout the TriMet service area, they are more highly concentrated on the east side of the Willamette River (Multnomah and Clackamas Counties) than the west (primarily Washington County).
- The TriMet service area's **LEP population** is about 7%, similar to 2022. LEP households are generally concentrated in the east and west areas of the service area.

Service and Service Area

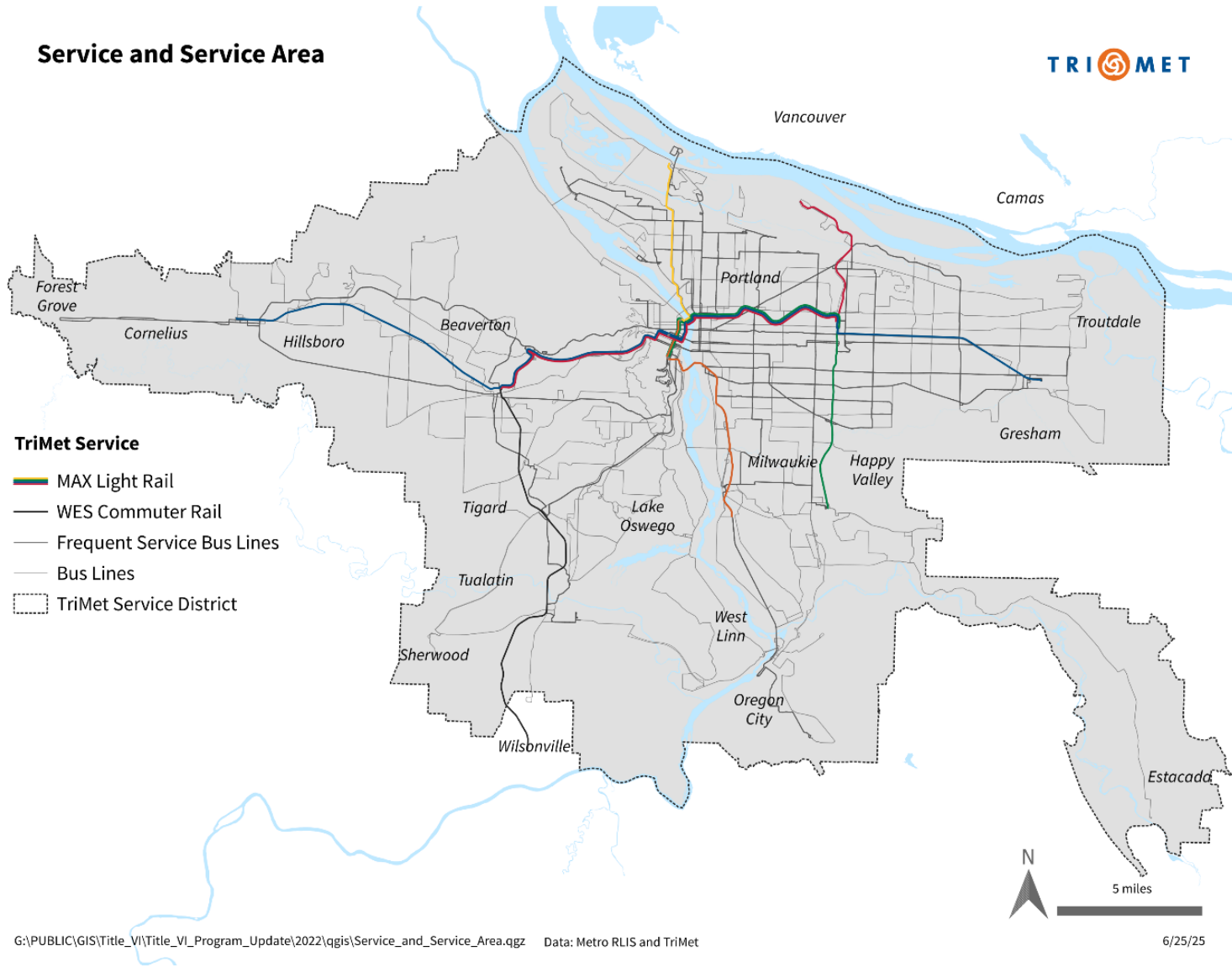


FIGURE 5-1: TriMet Service and Service Area

Service and Service Area with Minority Population

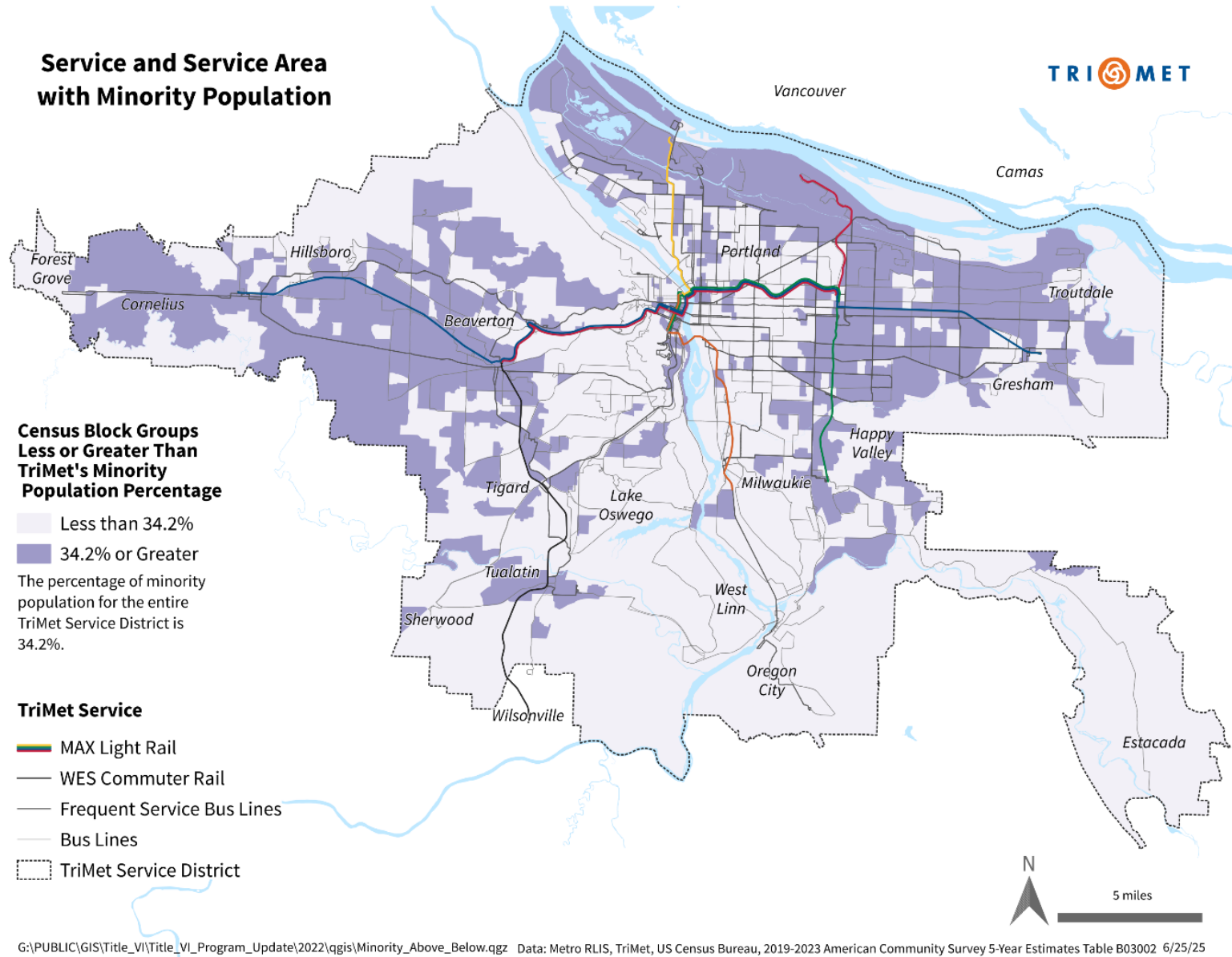
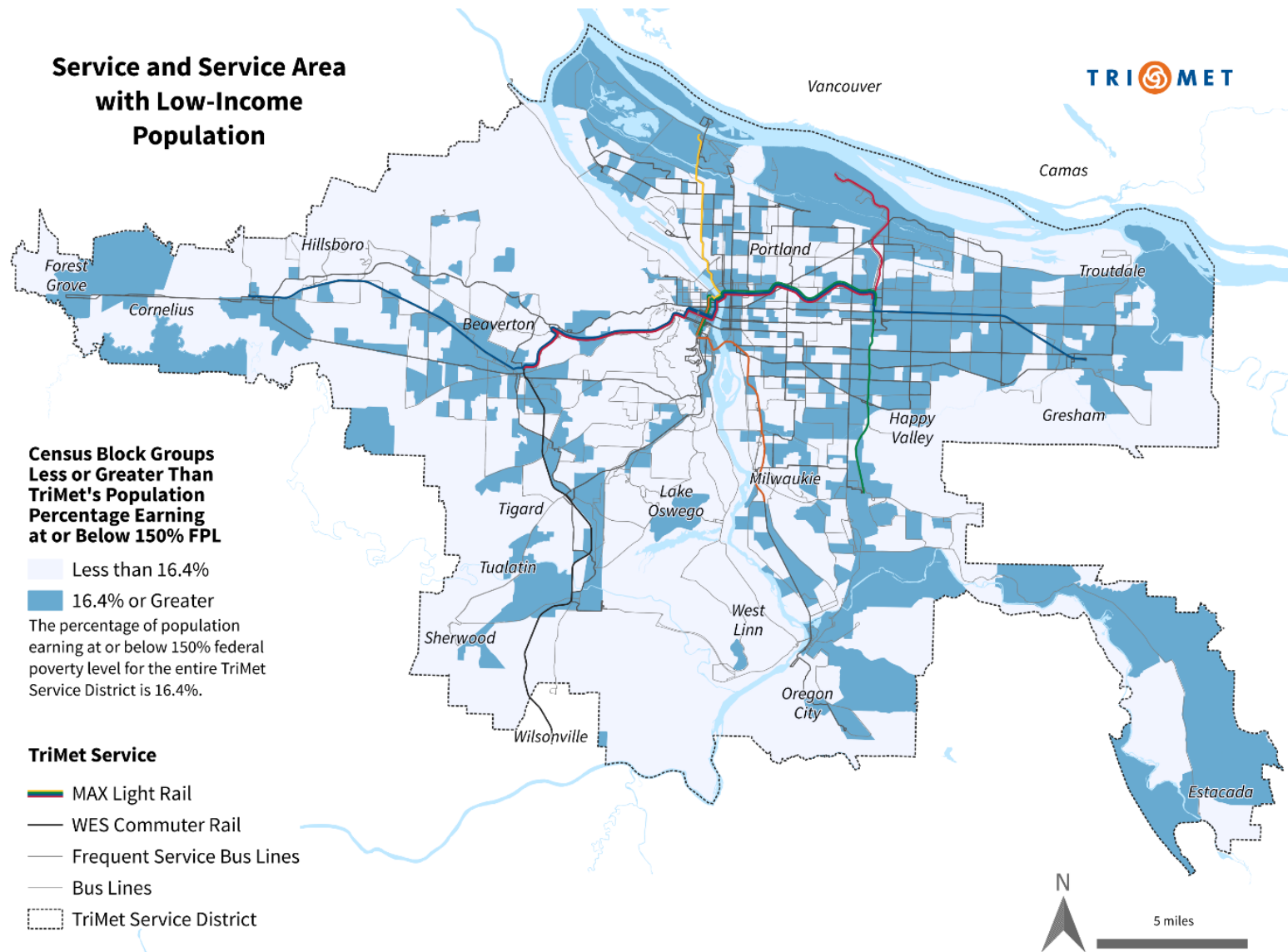


FIGURE 5-2: SERVICE AND SERVICE AREA WITH MINORITY POPULATION



G:\PUBLIC\GIS\Title_VI\Title_VI_Program_Update\2022\qgis\LowIncome_Above_Below.qgz Data: Metro RLIS, TriMet, US Census Bureau, 2019-2023 American Community Survey 5-Year Estimates Table C17002 6/25/25

FIGURE 5-3: SERVICE AND SERVICE AREA WITH LOW-INCOME POPULATION

Service and Service Area with Limited English Proficient Population

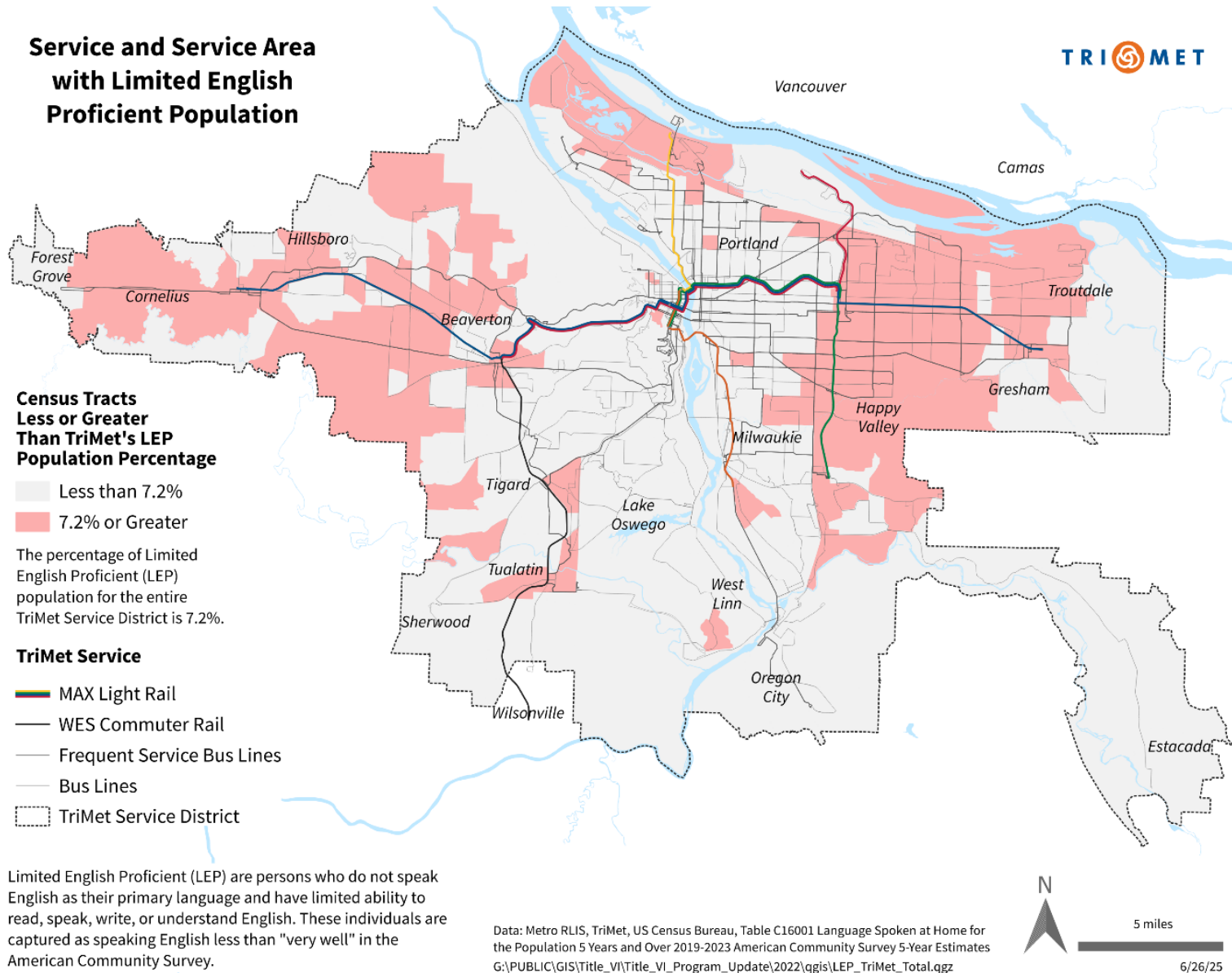


FIGURE 5-4: SERVICE AND SERVICE AREA WITH LIMITED ENGLISH PROFICIENT (LEP) POPULATION

Rider Characteristics and Demographics

TriMet regularly conducts public surveys to gather information on ridership patterns, fare payment and perceptions of TriMet. Surveys include optional demographic questions to inform outreach, analysis and service planning.

The analysis that follows uses results from TriMet’s 2025 Attitudes and Awareness Survey, conducted from April 28–June 1, 2025. A total of 4,632 people completed the survey either online or by phone and in seven different languages (English, Spanish, Chinese, Russian, Vietnamese, Korean and Arabic). Survey participants included both riders and non-riders.

Vehicle Modes Used (Bus, MAX, WES)

The majority of survey respondents (overall and within each demographic group) indicated that they rely on TriMet bus and/or MAX as one of their top five transportation options. A small percentage use WES (2-4% across demographic groups). Similar shares of minority, non-minority and non-low-income riders reported riding bus and MAX, while low-income riders are more likely to ride the bus (78% of low-income respondents) than MAX (68% of low-income respondents). See Figure 5-5.

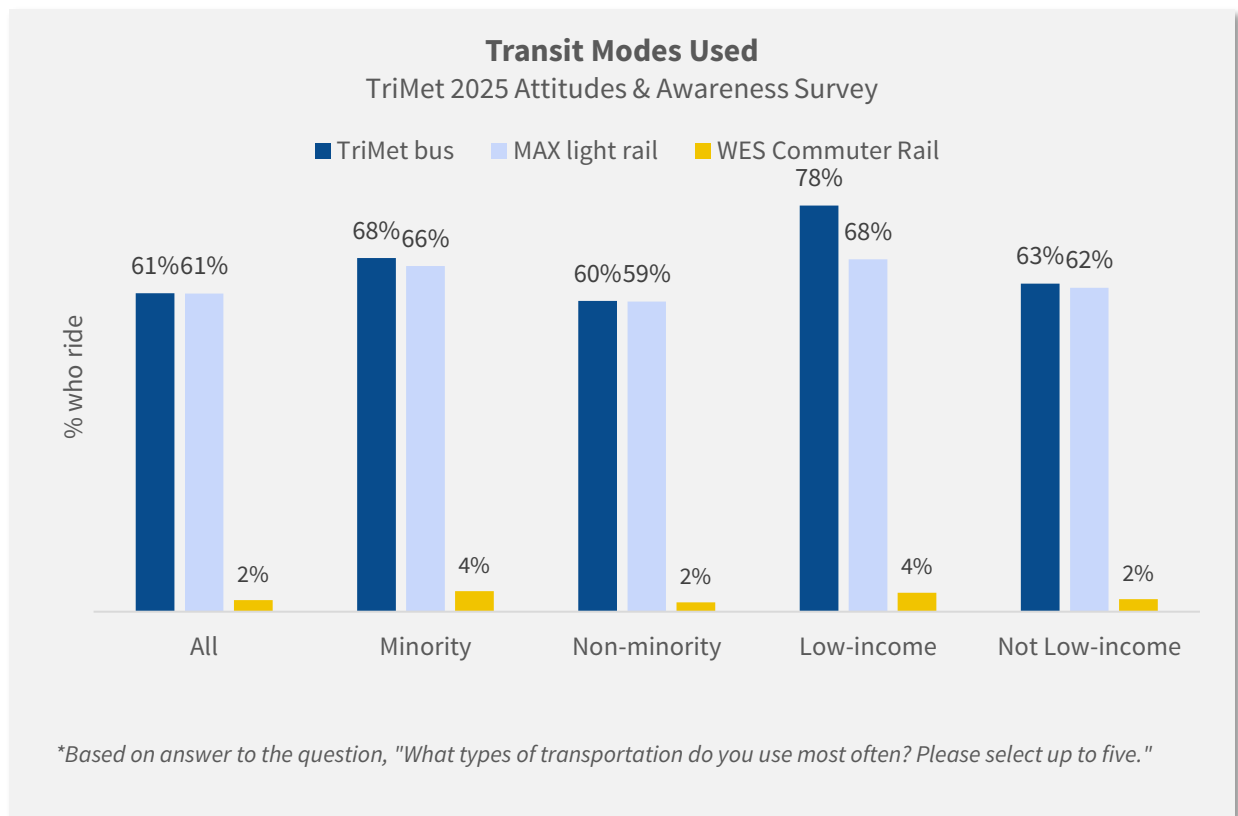


FIGURE 5-5: VEHICLE MODES BY DEMOGRAPHIC GROUP

Transfers

Most trips on TriMet do not involve a transfer. In other words, the majority of riders enjoyed a one-seat ride to complete their one-way trips. However, 53% of minority riders and 55% of low-income riders reported needing to transfer for half or more of their trips — higher than their non-minority and non-low-income counterparts (see Figure 5-6).

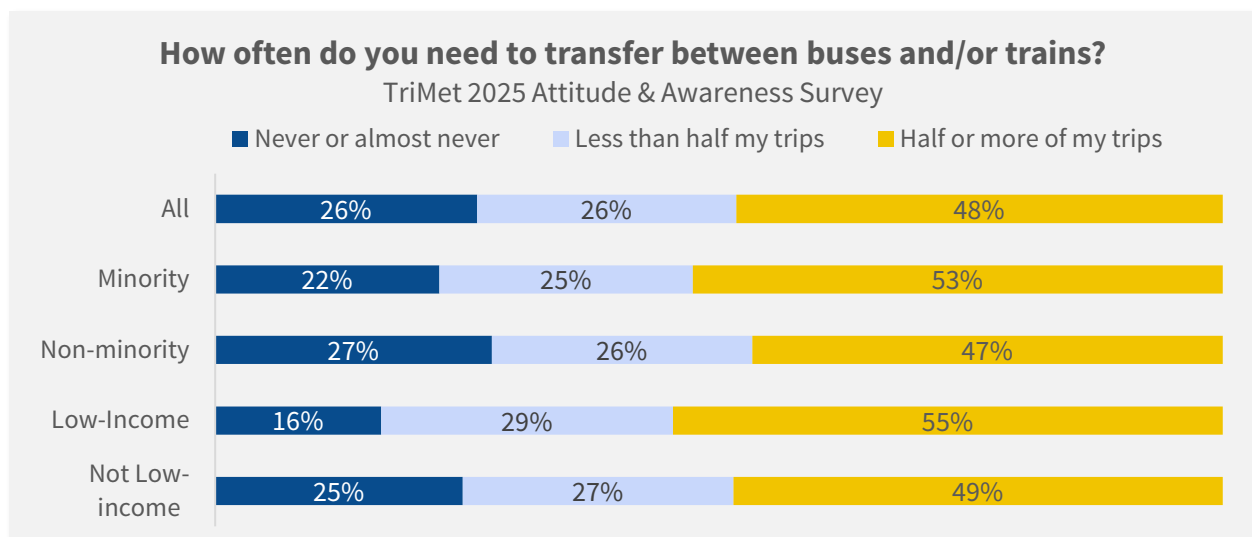


FIGURE 5-6: TRANSFER PATTERNS BY DEMOGRAPHIC GROUP

Frequency of Riding TriMet

The average number of times respondents rode TriMet in the last week was higher for trips made by minorities and low-income riders. As shown in Figure 5-7, 39% of minority and 47% of low-income riders reported riding regularly or frequently (several days a week or more) compared to 34% of non-minority and 37% of non-low-income riders.

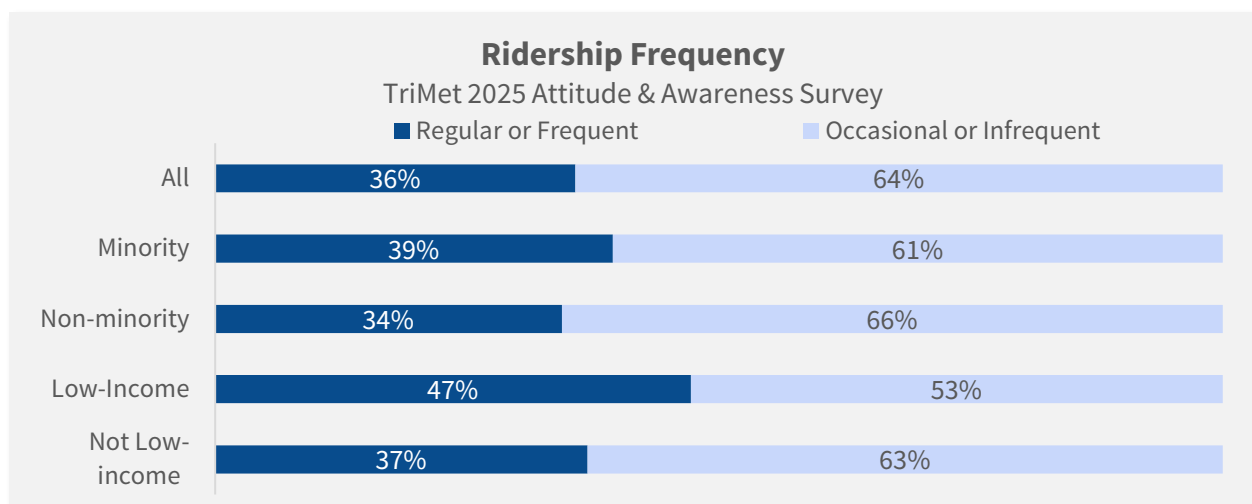


FIGURE 5-7: FREQUENCY OF RIDERSHIP BY DEMOGRAPHIC GROUP

Transit-Dependency

In order to explore transportation options available to TriMet riders, respondents were asked, “Would you consider yourself dependent on TriMet for the majority of your transportation needs?” As shown in Figure 5-8, minority and low-income riders are more likely to need TriMet to get around than non-minority and non-low-income riders.

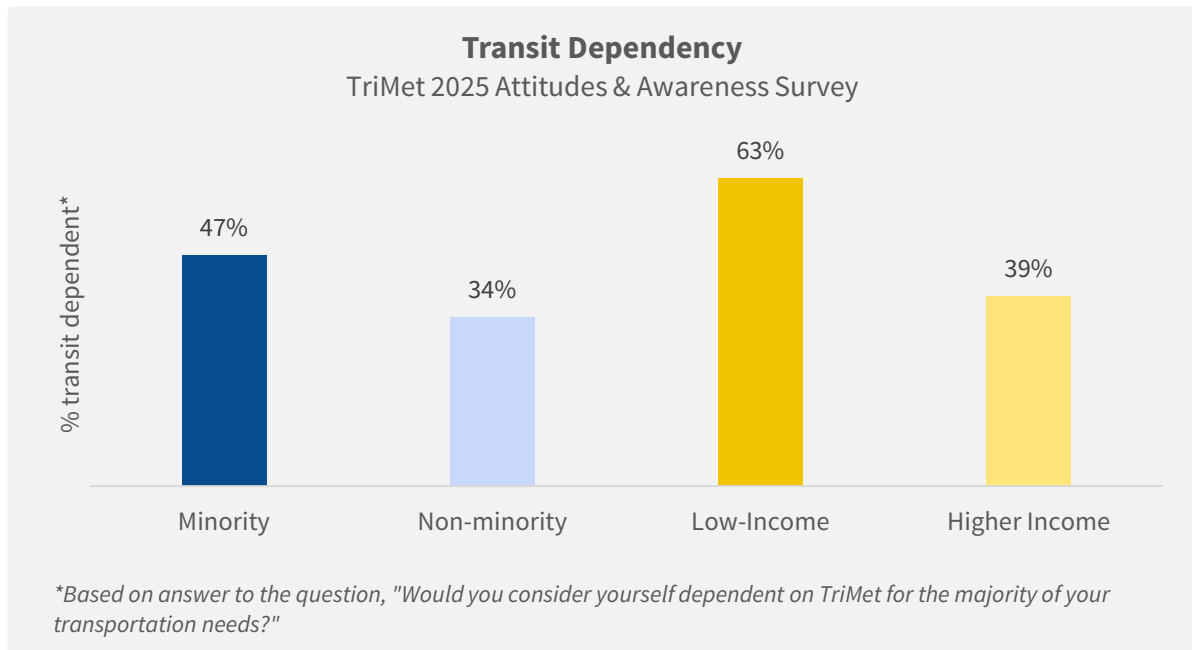


FIGURE 5-8: TRANSIT DEPENDENCY BY DEMOGRAPHIC GROUP

Fare Payment

The survey asked respondents about the fares they use and how they pay when they ride TriMet. Figures 5-9 and 5-10 reveal some differences between demographic groups:

1. Over one-third (35%) of non-minority riders pay the Honored Citizen fare, compared to 28% of minority riders.
2. The majority (55%) of low-income riders pay the Honored Citizen fare, compared to 33% of non-low-income riders.
3. Across all groups, most riders pay their fare using Hop Fastpass™ (either a plastic or virtual card). One notable difference between groups is the high percentage of low-income riders who use a plastic card (62% compared to 43-45% for other demographics).

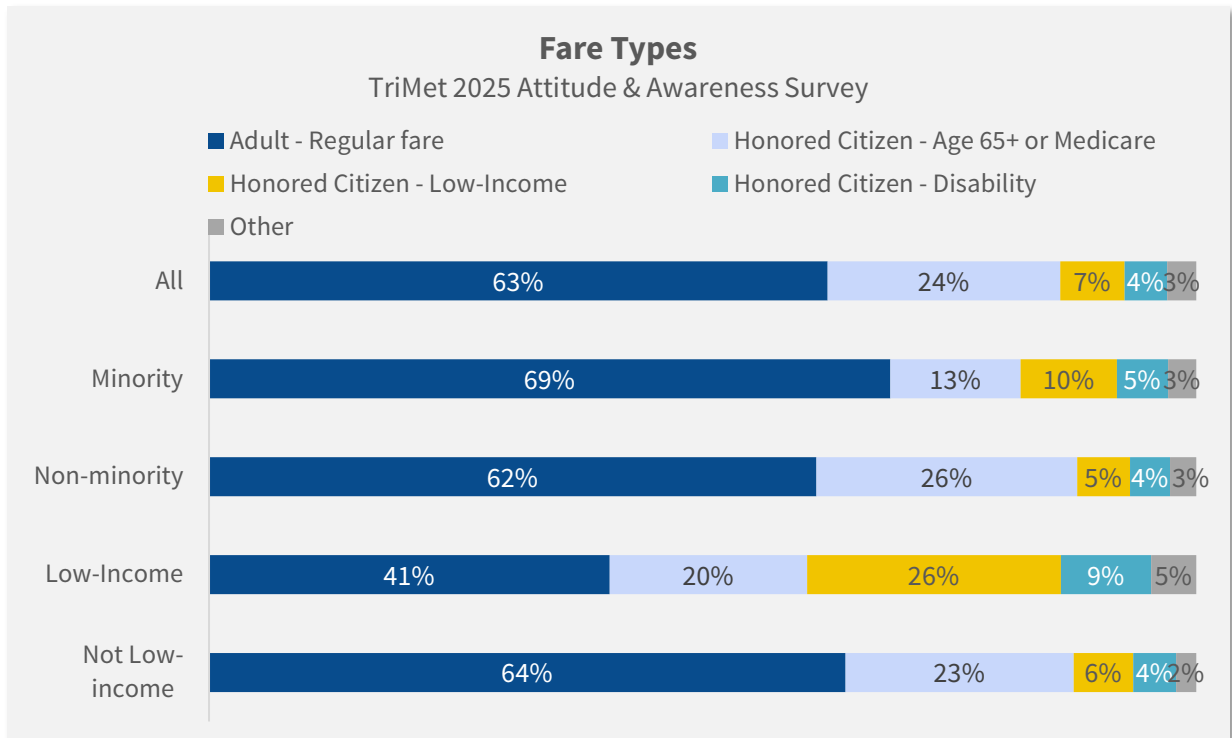


FIGURE 5-9: TYPES OF FARES USED BY DEMOGRAPHIC GROUP

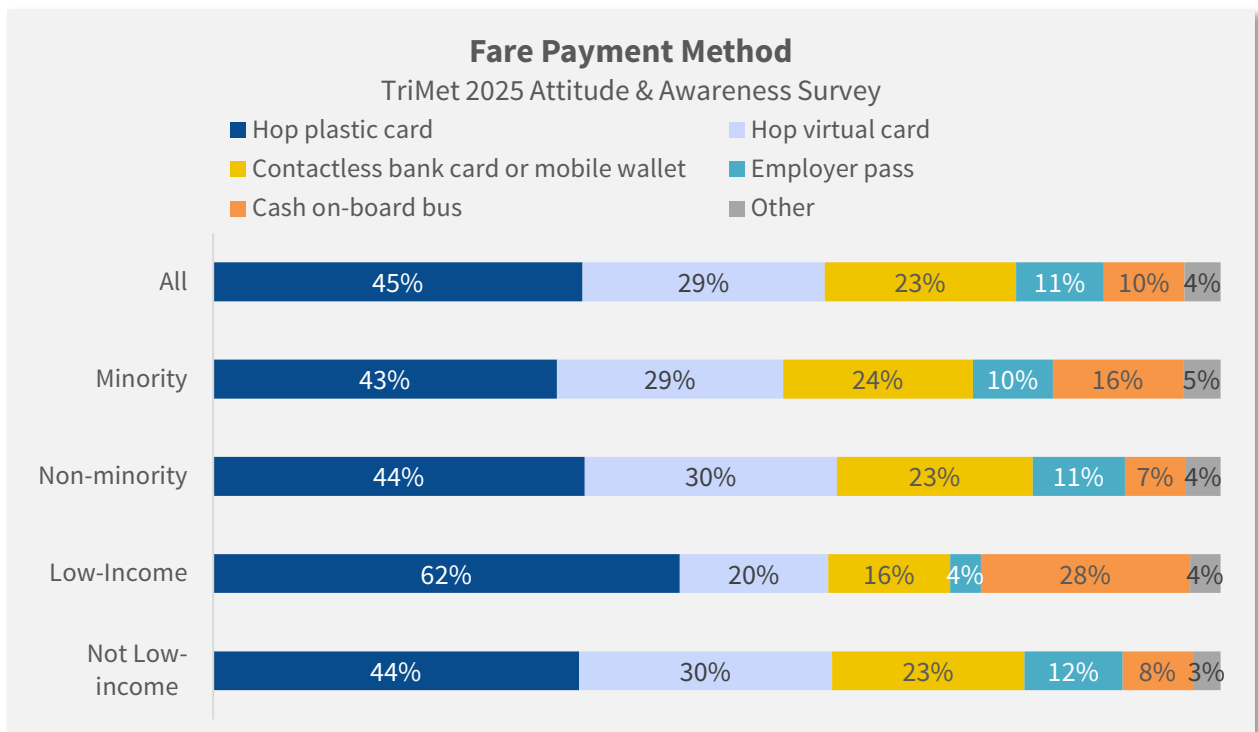


FIGURE 5-10: FARE PAYMENT PATTERNS BY DEMOGRAPHIC GROUP

Facilities

Three maps (Figures 5-11, through 5-13) are provided to illustrate determination of Title VI program compliance with respect to recent, in progress and planned major transit facility improvements.

These respective figures highlight transit facilities that:

1. Were recently replaced, improved, or;
2. Have improvements that are in progress, or;
3. Where improvements are scheduled (planned projects and projects identified in planning documents for an update in the next five years).

Figures 5-14 through 5-16 show Recent, In Progress and Planned Facilities organized by facility type and **do not reveal any apparent disparities in terms of proximity to these facilities.**

Recently Completed

- One storage and maintenance facility improvement
- Five transit center improvements
- Two park & ride improvements
- Three elevator refurbishments
- 45 major bus stop improvements
- Three light-rail corridor improvements
- One light-rail station improvement
- 369 digital display additions
- Six light rail crossing improvements
- 57 ADA text-to-speech devices installed
- 28 blue-light security phones installed at MAX stations

In Progress and Planned

- Two new high-capacity bus corridors
- Two new transit center improvements
- 12 light rail crossing improvements
- Seven elevator refurbishments
- 18 major bus stop improvements

- One light-rail station improvement
- 110 digital display additions
- 50 ADA text-to-speech devices
- 50 blue-light security phones

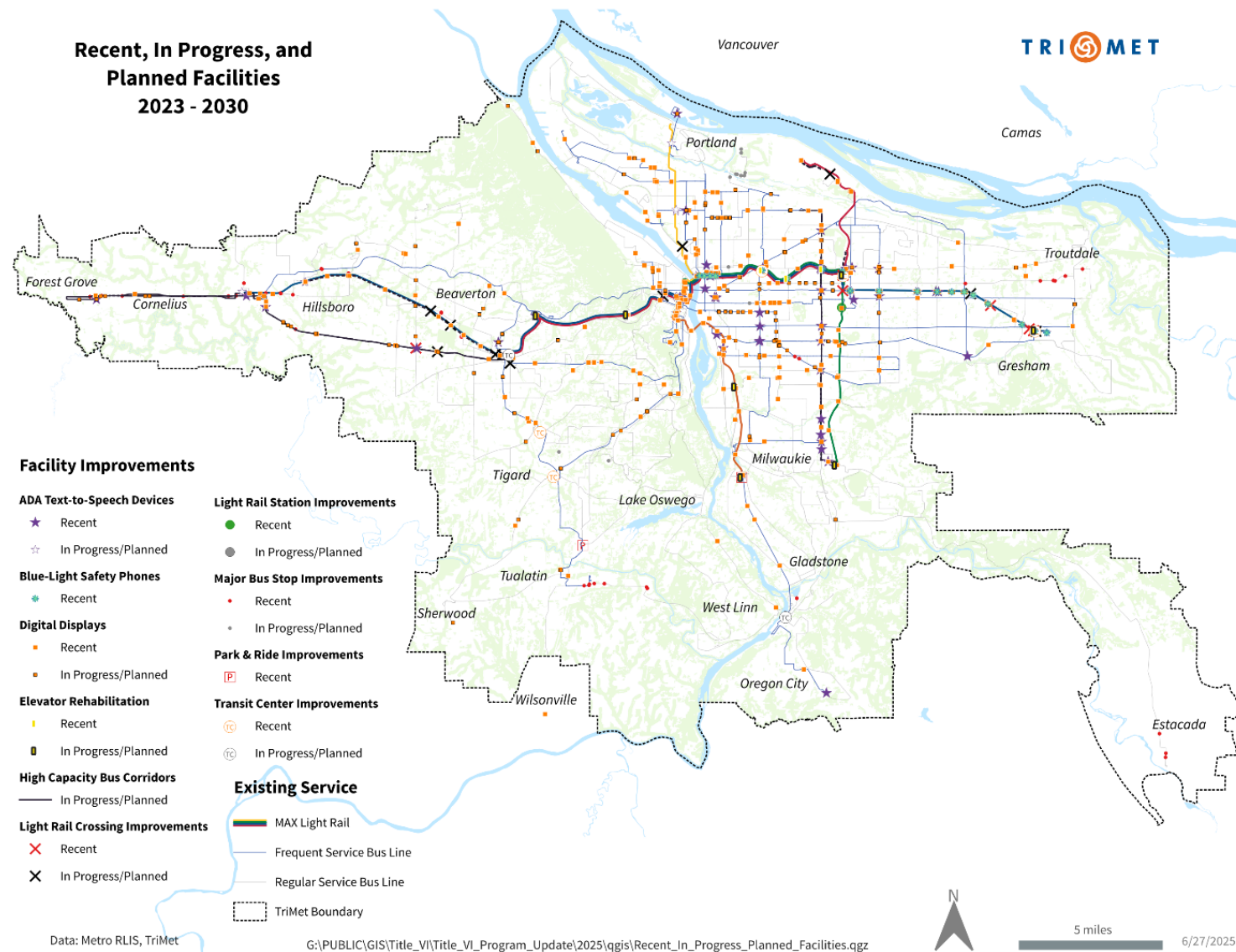


FIGURE 5-11: RECENT, IN PROGRESS AND PLANNED FACILITY IMPROVEMENTS

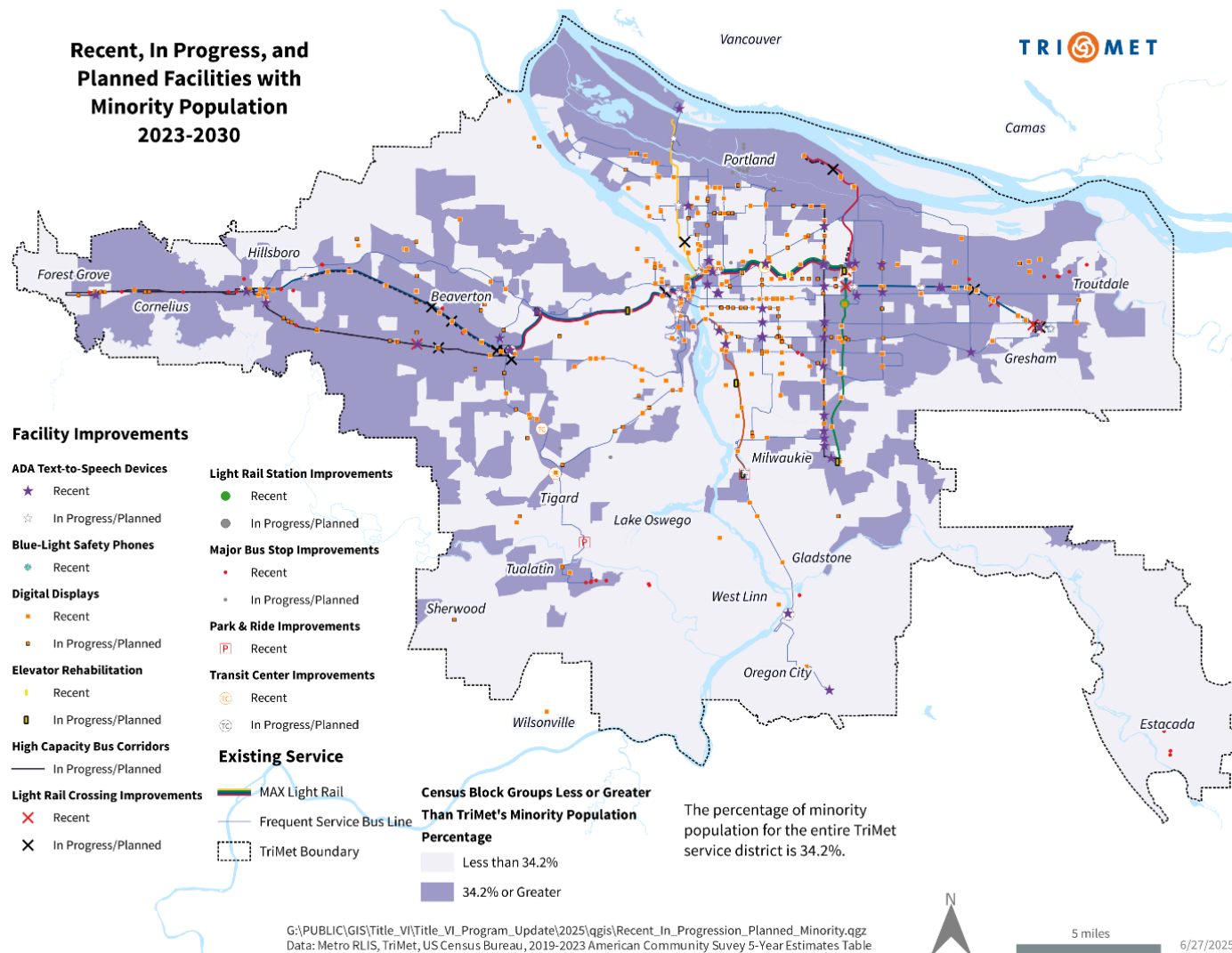


FIGURE 5-12: RECENT, IN PROGRESS AND PLANNED FACILITIES WITH MINORITY POPULATION

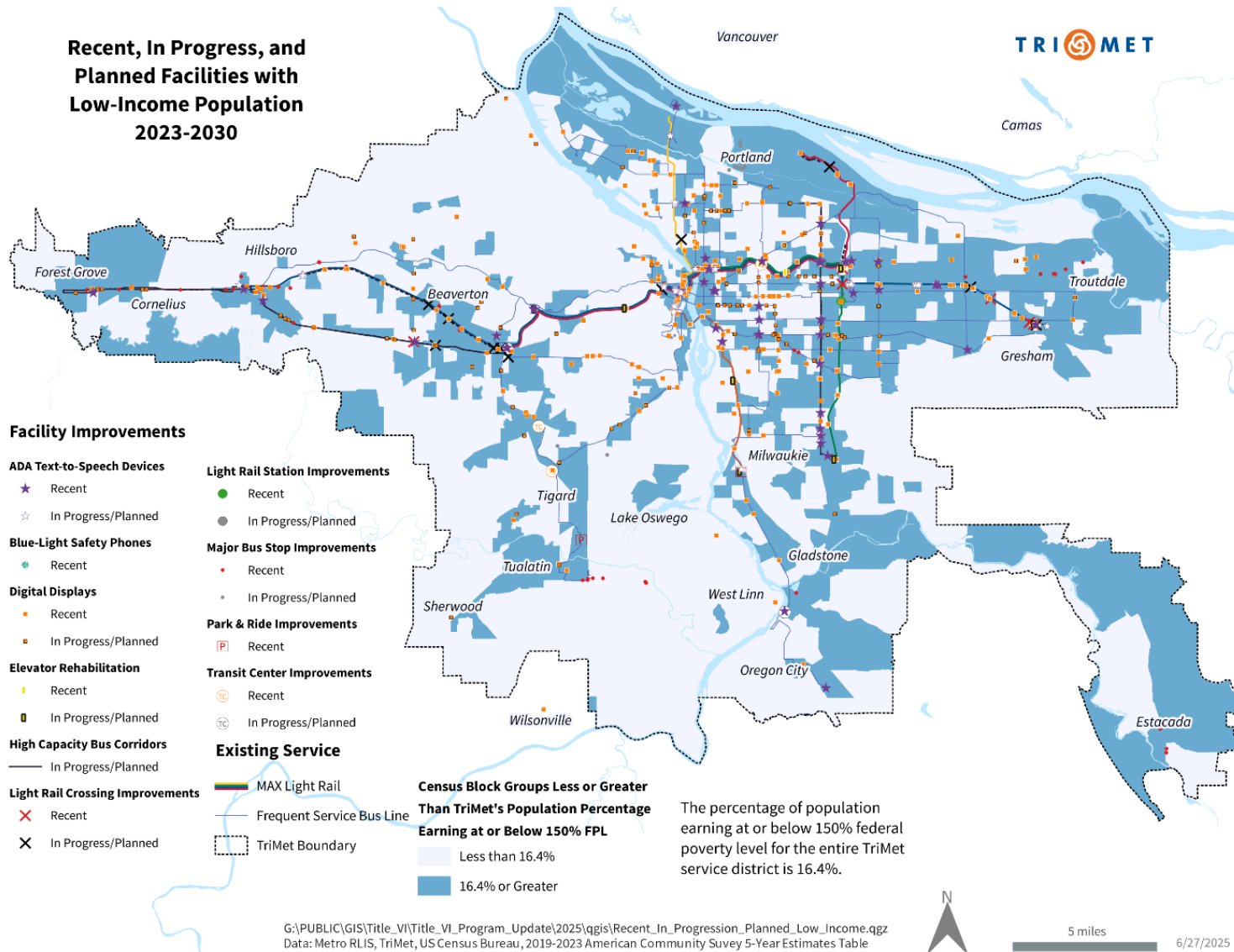


FIGURE 5-13: RECENT, IN PROGRESS AND PLANNED FACILITIES WITH LOW-INCOME POPULATION

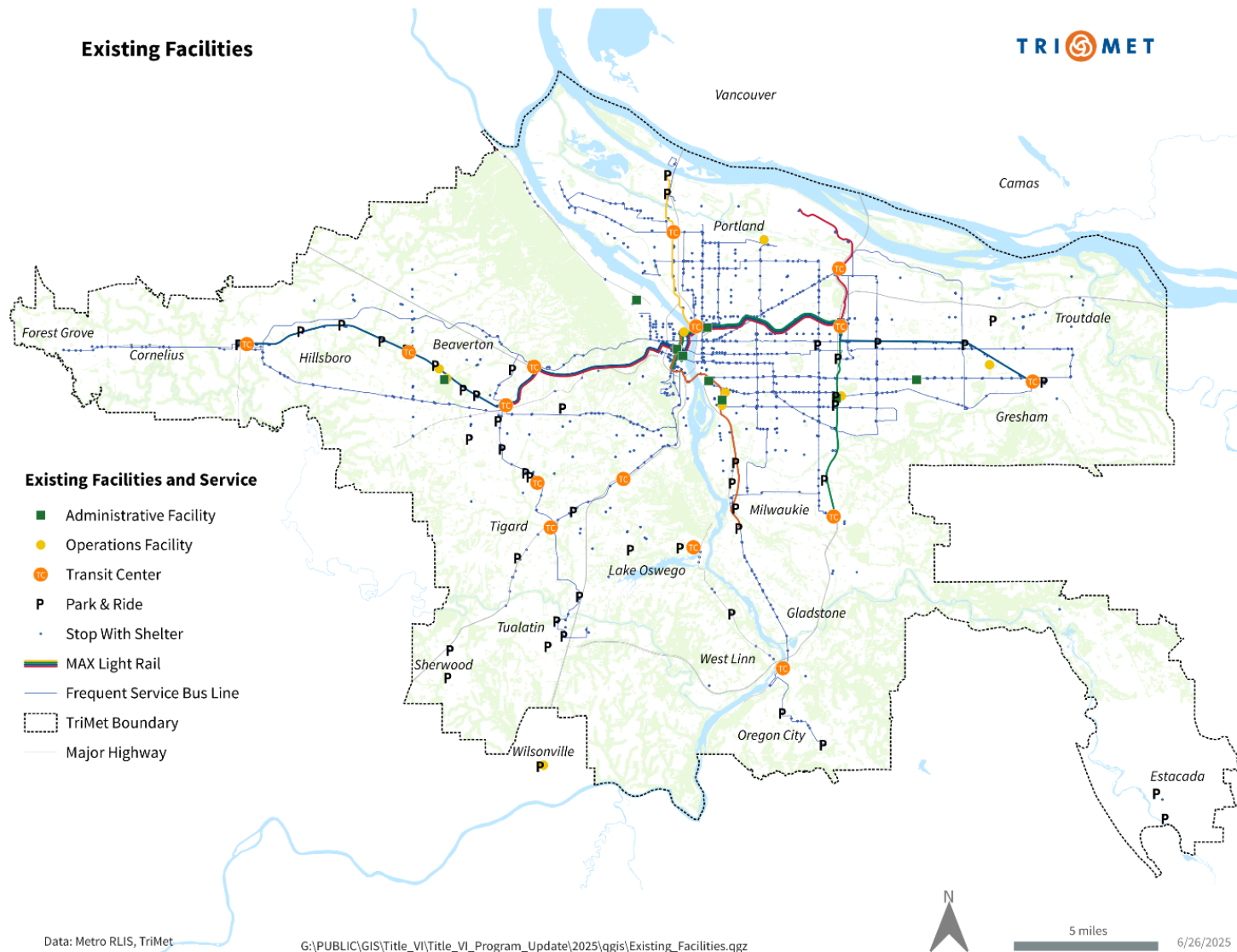


FIGURE 5-14: EXISTING FACILITIES

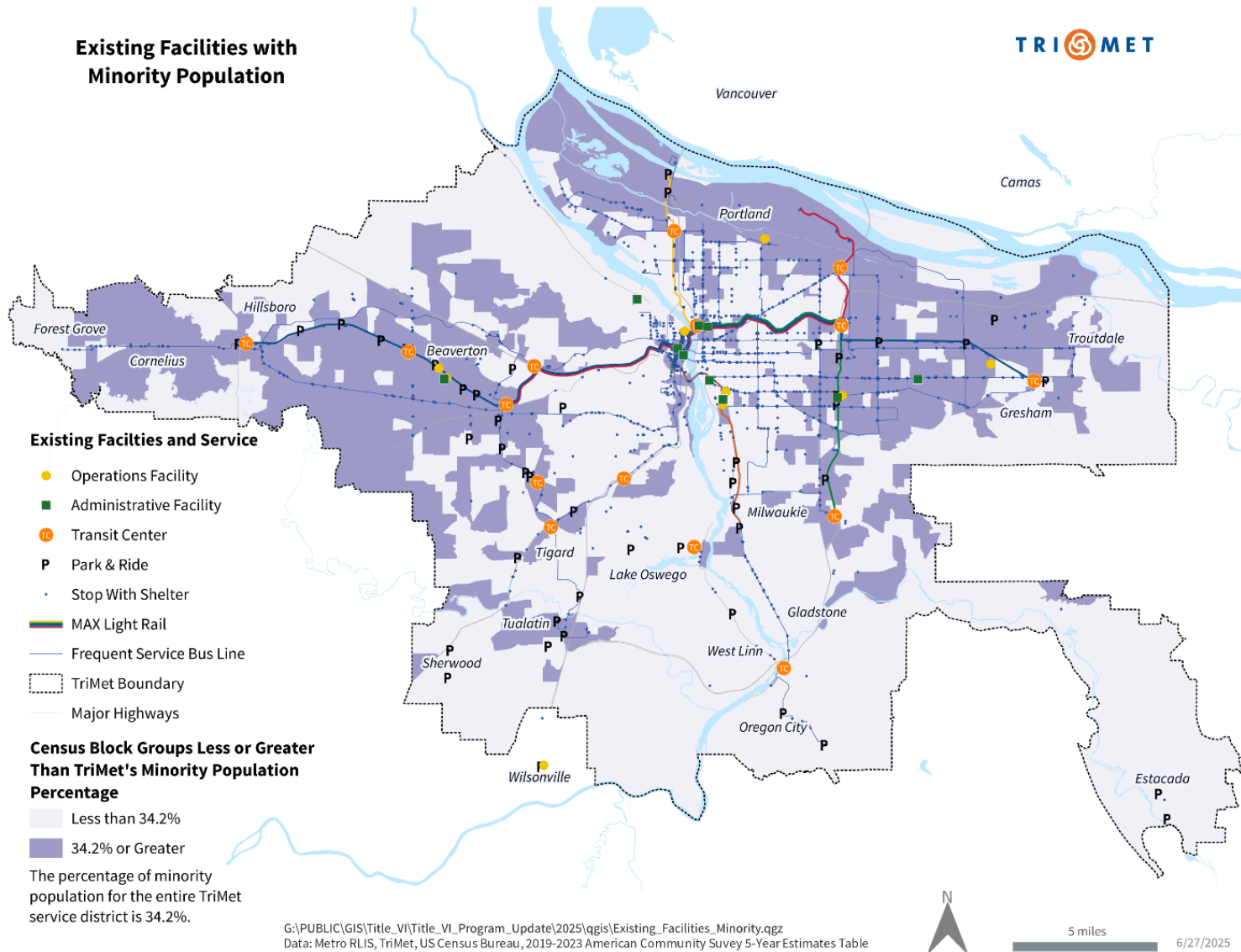


FIGURE 5-15: EXISTING FACILITIES WITH MINORITY POPULATION

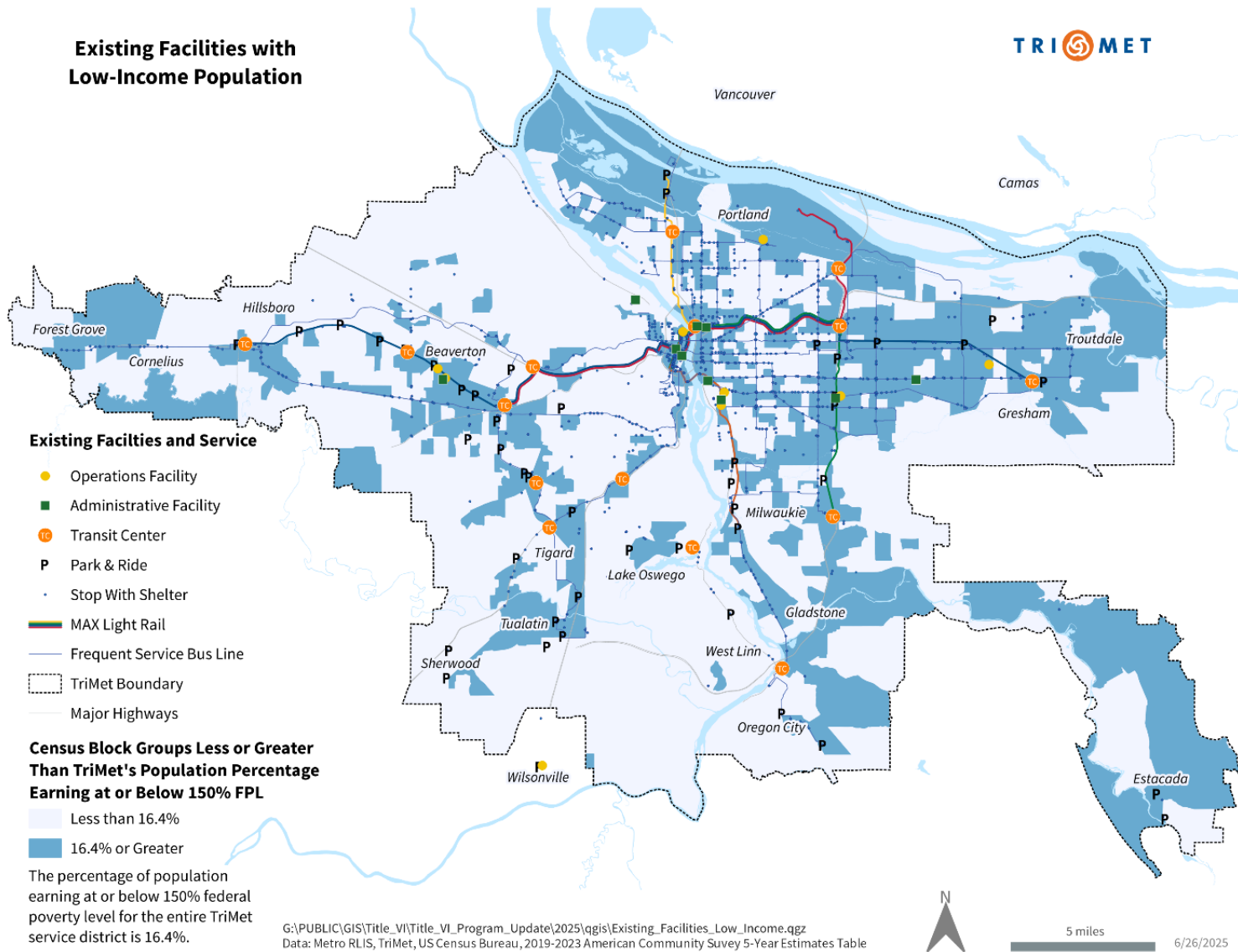


FIGURE 5-16: EXISTING FACILITIES WITH LOW-INCOME POPULATION