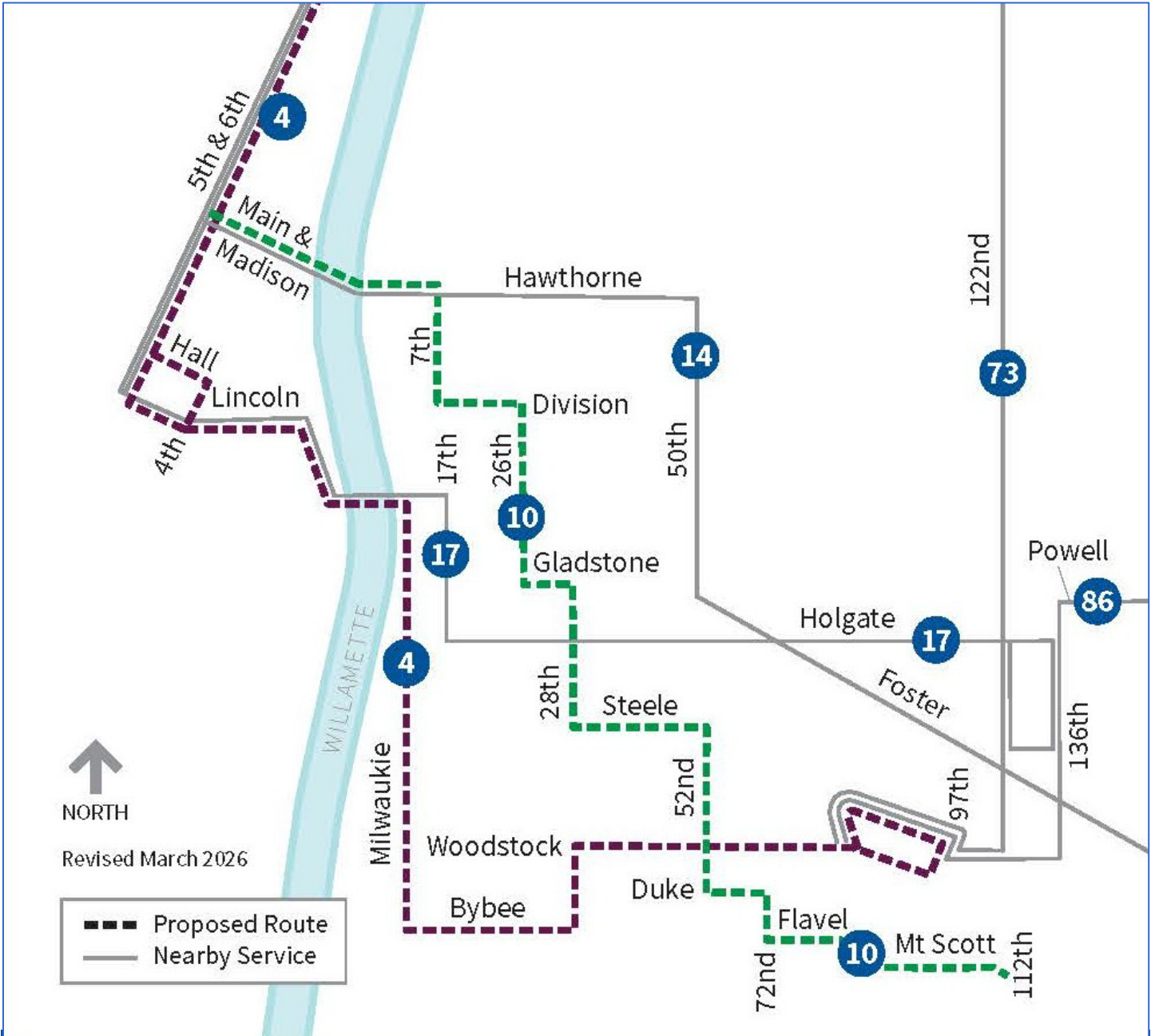




# Title VI Service Equity Analysis

FY2027 Annual Service Plan

DRAFT March 2026

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# Executive Summary

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## Overview

TriMet is proposing significant service changes in the FY2027 Annual Service Plan (ASP). This report and its documented approval by the TriMet Board of Directors fulfills TriMet's federal requirements to conduct a Title VI analysis prior to implementing these service changes, consistent with federal guidance and the TriMet Title VI Program.

While the ASP proposes an overall reduction in service, the plan also centers on network efficiency and moving segments of lines to maintain service in an area or serve a new area where demand is growing. Thus, the analysis examines both service reductions and service increases for potential Title VI concerns.

## Major Service Changes

The ASP proposes changes to 33 bus lines and the MAX Green Line. Of these, 20 bus lines and the MAX Green Line meet TriMet's threshold for a Major Service Change due to the degree of service reduction (i.e., decreases in frequency, hours, days, and/or route length). Additionally, 16 bus lines meet the Major Service Change threshold due to increased coverage resulting from route modifications and/or line merges.

## Findings

### Disparate Impact (Minority Populations)

None of the 21 lines proposed for Major Service Reductions meet the threshold for potential Disparate Impact (i.e., the minority population in their service areas is not at least 5 percentage points greater than the minority population of the TriMet district as a whole). Therefore, we find **no line-level Disparate Impact**.

We also find **no system-level Disparate Impacts** because the minority population in the service areas of all lines proposed for Major Service Changes is comparable to the minority population of the TriMet district as a whole (i.e., within 5 percentage points).

### Disproportionate Burden (Low-income Populations)

Eight (8) of the lines proposed for Major Service Changes were flagged for potential Disproportionate Burden due to having low-income population in their current service areas of at least 21%, or 5 percentage points greater than the 16% low-income population of the TriMet district as a whole.

Changes to three (3) of these lines also meet TriMet’s Title VI definition of “adverse effect,” meaning **we find line-level Disproportionate Burdens** resulting from these changes.

This finding calls for TriMet to take measures to minimize or mitigate impacts, or provide a “substantial legitimate justification” for moving forward with the changes. Some of these measures are built in to the ASP as it was designed to a) reduce service where ridership is lowest, and b) minimize impacts of cutting or eliminating lines by modifying routes and/or merging lines. Additionally, the original ASP shared with the public in early 2026 has been refined to further minimize and mitigate potential impacts by incorporating feedback heard through the community engagement process.

We find **no system-level Disproportionate Burden** because the low-income population in the service areas of all lines proposed for Major Service Changes is comparable to the low-income population of the TriMet district as a whole (i.e., within 5 percentage points).

## Summary Table

| Analysis                             | Results                                                                                                                   |
|--------------------------------------|---------------------------------------------------------------------------------------------------------------------------|
| <b>Major Service Reductions</b>      | <b>21 lines</b>                                                                                                           |
| Disparate Impact (minority)          | Line-level: <b>No</b><br>System-level: <b>No</b>                                                                          |
| Disproportionate Burden (low-income) | Line-level: <b>3 lines</b> , adverse effects minimized and/or mitigated to the degree possible<br>System-level: <b>No</b> |
| <b>Major Service Increases*</b>      | <b>15 lines</b>                                                                                                           |
| Disparate Impact (minority)          | <b>No</b>                                                                                                                 |
| Disproportionate Burden (low-income) | <b>No</b>                                                                                                                 |

*\*Analysis of Major Service Increases is performed at the system-level only.*

## Community Engagement

In addition to the quantitative Title VI analysis, community engagement is crucial to understand and respond to potential impacts of service cuts on riders, including low-income and minority riders. To this end, TriMet conducted two rounds of community engagement, first to inform the conceptual development of the ASP, then to solicit feedback on the draft ASP. After receiving feedback on the draft ASP during the second round of engagement, TriMet made multiple modifications to minimize and mitigate potential impacts on riders.

# Background

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TriMet announced a \$300 million annual budget gap in July 2025. As part of the necessary actions to close the gap, TriMet must reduce service and find efficiencies across the transit system. TriMet implemented minor service cuts in winter 2025 and spring 2026 to begin this effort; none of these met the thresholds established in TriMet's Title VI [Major Service Change Policy](#). However, more significant changes are necessary in 2026 and 2027.

The FY2027 Annual Service Plan (ASP) lays out proposed service changes and cuts to take effect in August 2026. This report fulfills TriMet's requirements to conduct a Title VI analysis prior to implementing these changes, consistent with *FTA Circular 4702.1B Title VI Requirements and Guidelines for Federal Transit Administration Recipients* and TriMet's Title VI Program.

# TriMet Title VI Compliance

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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*. These include requirements to develop agency-specific policies for Major Service Change, Disparate Impact, and Disproportionate Burden.

## Major Service Change Policy

All changes in service meeting the definition of “Major Service Change” are subject to a Title VI Analysis prior to the TriMet Board of Directors approval of the service change. A Title VI Analysis will be completed for all Major Service Changes and will be presented to the Board for its awareness and consideration. The Title VI Analysis will be 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 of **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 established by TriMet Code.
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 detours 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 1/4-mile from bus stops or 1/2-mile from 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 affecting minority populations at a level exceeding the thresholds established in the adopted Disparate Impact Policy, or 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 to serve the same objectives but do so 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.

The determination of Disparate Impact associated with service changes is defined separately for impacts of changes on individual lines 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 these transit lines' service areas is at least 5 percentage points *higher* than the service areas' 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 change the route of a transit line and double its service, but the change 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 these transit lines' service areas is at least 5 percentage points *lower* than the service areas' 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 there are no alternatives with a less Disparate Impact on minority riders that would still accomplish the project or program goals.

## 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 exceeding the thresholds established in the adopted Disproportionate Burden Policy, or 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 to serve the same objectives 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 these transit lines' service areas is at least 5 percentage points *higher* than the service areas' 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 detour a transit line and double its service, but the change removes service from a Department of Human Services office 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 these transit lines' service areas is at least 5 percentage points *lower* than the service areas' 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 there are no alternatives with a less Disproportionate Burden on low-income riders that would still accomplish the project or program goals.

# Analysis of Proposed Service Changes

In a fall 2025 community survey, riders expressed the following priorities for service cuts:

- Preserve service as much as possible by first reducing where buses and trains run on the same route or close together.
- Minimize cuts to Frequent Service lines.
- Maintain evening and weekend service to the degree possible.
- Maintain transit to reach critical destinations like medical care and schools.

TriMet shaped the FY27 Annual Service Plan (ASP) accordingly. The ASP proposes service changes to 34 TriMet lines, which includes 33 bus lines and the MAX Green Line, designed to prioritize network efficiency, combining lines or reducing where lines run near others. The proposals eliminate some bus lines and move routes to maintain as much service as possible in order to focus service investment where it is needed and used most. While the plan maintains frequency on higher-used lines, some proposed changes reduce how often buses arrive at times when fewer people are riding.

While the ASP proposes an overall reduction in service, proposals for some lines include new coverage for those lines as a result of route modifications and/or combining lines. Thus, the analysis examines both service reductions and service increases for potential Title VI concerns.

## Service Reductions

### Major Service Change Test

As shown in Table 1, service change proposals for **21 lines** meet the Major Service Change threshold due to a 15%-or-greater reduction in route miles and/or vehicle hours.

**TABLE 1: PROPOSED FY27 ASP SERVICE REDUCTIONS**

| Line                   | Route Length Decrease Only* | Vehicle Hour Decrease** | Major Service Reduction? |
|------------------------|-----------------------------|-------------------------|--------------------------|
| MAX Green Line         | -53%                        | -58%                    | Y                        |
| 8-Jackson Park/NE 15th | -4%                         | N/A                     | N                        |

| Line                       | Route Length Decrease Only* | Vehicle Hour Decrease** | Major Service Reduction? |
|----------------------------|-----------------------------|-------------------------|--------------------------|
| 10-Harold                  | -40%                        | -32%                    | Y                        |
| 15-Belmont/NW 23rd         | N/A                         | N/A                     | N                        |
| 16-Front Ave/St Helens Rd  | -66%                        | -48%                    | Y                        |
| 17-Holgate/Broadway        | -21%                        | N/A                     | Y                        |
| 19-Glisan                  | -62%                        | -84%                    | Y                        |
| 20-Burnside/Stark          | -14%                        | -12%                    | N                        |
| 29-Lake/Webster Rd         | N/A                         | -58%                    | Y                        |
| 30-Estacada                | N/A                         | N/A                     | N                        |
| 31-Webster Rd              | N/A                         | N/A                     | N                        |
| 32-Oatfield                | Eliminate                   |                         | Y                        |
| 33-McLoughlin/King Rd      | -19%                        | -4%                     | Y                        |
| 34-Linwood/River Rd        | -61%                        | -25%                    | Y                        |
| 37-Lake Grove              | Eliminate                   |                         | Y                        |
| 38-Boones Ferry            | Eliminate                   |                         | Y                        |
| 39-Arnold Creek/Hillsdale  | Eliminate                   |                         | Y                        |
| 40-Tacoma/Swan Island      | N/A                         | N/A                     | N                        |
| 44-Capitol Hwy/Mocks Crest | -6%                         | -14%                    | N                        |
| 45-Garden Home             | -57%                        | -45%                    | Y                        |
| 51-Vista/Sunset Blvd.      | N/A                         | -41%                    | Y                        |
| 70-12th/NE 33rd            | -49%                        | -37%                    | Y                        |
| 72-Killingsworth/82nd Ave. | N/A                         | -7%                     | N                        |
| 76-Hall/Greenburg          | -43%                        | -7%                     | Y                        |
| 77-Broadway/Halsey         | -1%                         | N/A                     | N                        |
| 79-Clackamas/Oregon City   | -34%                        | -25%                    | Y                        |
| 82-South Gresham           | Eliminate                   |                         | Y                        |
| 96-Tualatin/I-5            | -68%                        | -64%                    | Y                        |

| Line                     | Route Length Decrease Only* | Vehicle Hour Decrease** | Major Service Reduction? |
|--------------------------|-----------------------------|-------------------------|--------------------------|
| 97-Tualatin-Sherwood Rd. | N/A                         | N/A                     | N                        |
| 152-Milwaukie            | Eliminate                   |                         | Y                        |
| 153-Salamo/Stafford      | Eliminate                   |                         | Y                        |
| 156-Mather Rd            | -14%                        | N/A                     | N                        |

\*For the purposes of this analysis, route length changes are analyzed for both decreases (i.e., segments removed) and increases (i.e., segments added due to line merges and/or route modifications).

\*\*Decreases in vehicle hours may be due to reductions in frequency, span, route length, or any combination of these.

## Disparate Impact Analysis (Minority Populations)

### Line-level Analysis

As shown in Table 2, **none of the 21 lines** proposed for Major Service Reductions meet the threshold for potential Disparate Impact (i.e., the minority population in their service areas is not at least 5 percentage points greater than the 34% minority population of the TriMet district as a whole). Therefore, we find **no line-level Disparate Impacts**.

**TABLE 2: LINE-LEVEL DISPARATE IMPACT ANALYSIS**

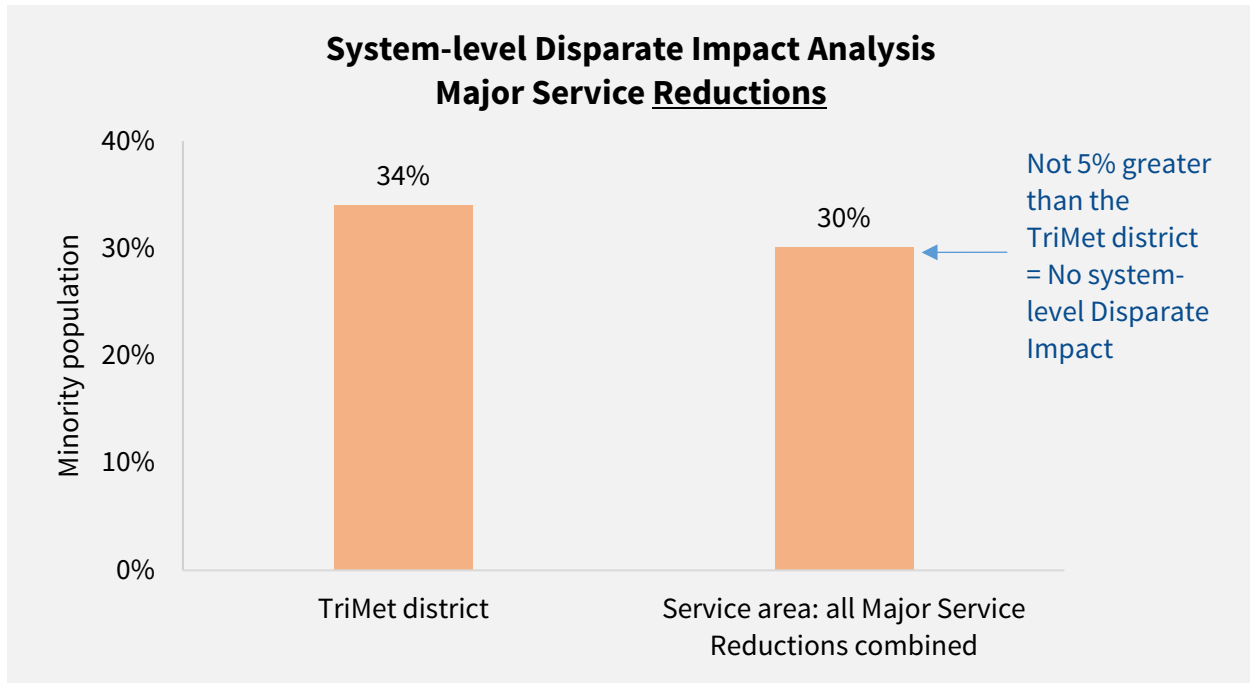
| Line                      | Line Service area minority population % | Line Service area and TriMet district difference<br>(TriMet district = 34% minority population) | Potential Disparate Impact?<br>(+5% or greater) |
|---------------------------|-----------------------------------------|-------------------------------------------------------------------------------------------------|-------------------------------------------------|
| MAX Green Line            | 35%                                     | +1%                                                                                             | N                                               |
| 10-Harold                 | 32%                                     | -2%                                                                                             | N                                               |
| 16-Front Ave/St Helens Rd | 28%                                     | -6%                                                                                             | N                                               |
| 17-Holgate/Broadway       | 31%                                     | -3%                                                                                             | N                                               |
| 19-Glisan                 | 30%                                     | -4%                                                                                             | N                                               |
| 29-Lake/Webster Rd        | 27%                                     | -7%                                                                                             | N                                               |
| 32-Oatfield               | 18%                                     | -16%                                                                                            | N                                               |

| Line                      | Line Service area minority population % | Line Service area and TriMet district difference<br>(TriMet district = 34% minority population) | Potential Disparate Impact?<br>(+5% or greater) |
|---------------------------|-----------------------------------------|-------------------------------------------------------------------------------------------------|-------------------------------------------------|
| 33-McLoughlin/King Rd     | 23%                                     | -11%                                                                                            | N                                               |
| 34-Linwood/River Rd       | 22%                                     | -12%                                                                                            | N                                               |
| 37-Lake Grove             | 20%                                     | -14%                                                                                            | N                                               |
| 38-Boones Ferry           | 29%                                     | -5%                                                                                             | N                                               |
| 39-Arnold Creek/Hillsdale | 25%                                     | -11%                                                                                            | N                                               |
| 45-Garden Home            | 31%                                     | -4%                                                                                             | N                                               |
| 51-Vista/Sunset Blvd.     | 24%                                     | -10%                                                                                            | N                                               |
| 70-12th/NE 33rd           | 24%                                     | -10%                                                                                            | N                                               |
| 76-Hall/Greenburg         | 38%                                     | +4%                                                                                             | N                                               |
| 79-Clackamas/Oregon City  | 30%                                     | -4%                                                                                             | N                                               |
| 82-South Gresham          | 38%                                     | +4%                                                                                             | N                                               |
| 96-Tualatin/I-5           | 34%                                     | 0%                                                                                              | N                                               |
| 152-Milwaukie             | 29%                                     | -5%                                                                                             | N                                               |
| 153-Salamo/Stafford       | 21%                                     | -13%                                                                                            | N                                               |

Source: 2019-2023 American Community Survey

## System-level Analysis

As shown in Figure 1, the population living in service areas of lines where Major Service Reductions would occur is 30% minority. A potential Disparate Impact would exist if the minority population was at least 5 percentage points greater in these areas than the 34% minority population of the TriMet district as a whole. Since the minority population is actually *lower* in these service areas, we find **no system-level Disparate Impact**.



**FIGURE 1:** COMPARISON OF MINORITY POPULATIONS BETWEEN THE TRIMET DISTRICT AND THE SERVICE AREAS OF ALL MAJOR SERVICE REDUCTIONS COMBINED

## Disproportionate Burden Analysis (Low-income Populations)

### Line-level Analysis

As shown in Table 3, changes to **8 of the 22** lines proposed for Major Service Reductions meet the threshold for potential Disproportionate Burden because the low-income population in their service areas is over 5 percentage points greater than the 16% low-income population of the TriMet district as a whole.

**TABLE 3:** LINE-LEVEL DISPROPORTIONATE BURDEN ANALYSIS

| Line                      | Line Service area low-income population % | Line Service area and TriMet district difference<br>(TriMet district = 16% low-income population) | Potential Disproportionate Burden?<br>(+5% or greater) |
|---------------------------|-------------------------------------------|---------------------------------------------------------------------------------------------------|--------------------------------------------------------|
| MAX Green Line            | 30%                                       | +14%                                                                                              | Y                                                      |
| 10-Harold                 | 22%                                       | +6%                                                                                               | Y                                                      |
| 16-Front Ave/St Helens Rd | 28%                                       | +12%                                                                                              | Y                                                      |
| 17-Holgate/Broadway       | 22%                                       | +6%                                                                                               | Y                                                      |

| Line                      | Line Service area<br>low-income<br>population % | Line Service area<br>and TriMet district<br>difference<br>(TriMet district = 16%<br>low-income<br>population) | Potential<br>Disproportion-<br>ate Burden?<br>(+5% or greater) |
|---------------------------|-------------------------------------------------|---------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|
| 19-Glisan                 | 20%                                             | +4%                                                                                                           | N                                                              |
| 29-Lake/Webster Rd        | 20%                                             | +4%                                                                                                           | N                                                              |
| 32-Oatfield               | 16%                                             | 0%                                                                                                            | N                                                              |
| 33-McLoughlin/King Rd     | 18%                                             | +2%                                                                                                           | N                                                              |
| 34-Linwood/River Rd       | 19%                                             | +3%                                                                                                           | N                                                              |
| 37-Lake Grove             | 8%                                              | -8%                                                                                                           | N                                                              |
| 38-Boones Ferry           | 18%                                             | +2%                                                                                                           | N                                                              |
| 39-Arnold Creek/Hillsdale | 12%                                             | -4%                                                                                                           | N                                                              |
| 45-Garden Home            | 20%                                             | +4%                                                                                                           | N                                                              |
| 51-Vista/Sunset Blvd.     | 16%                                             | 0%                                                                                                            | N                                                              |
| 70-12th/NE 33rd           | 14%                                             | -2%                                                                                                           | N                                                              |
| 76-Hall/Greenburg         | 18%                                             | +2%                                                                                                           | N                                                              |
| 79-Clackamas/Oregon City  | 32%                                             | +16%                                                                                                          | Y                                                              |
| 82-South Gresham          | 22%                                             | +6%                                                                                                           | Y                                                              |
| 96-Tualatin/I-5           | 23%                                             | +7%                                                                                                           | Y                                                              |
| 97-Tualatin-Sherwood Rd.  | 18%                                             | +2%                                                                                                           | N                                                              |
| 152-Milwaukie             | 24%                                             | +8%                                                                                                           | Y                                                              |
| 153-Salamo/Stafford       | 9%                                              | -7%                                                                                                           | N                                                              |

Source: 2019-2023 American Community Survey

Three of the lines flagged for potential Disproportionate Burden meet TriMet's definition of "adverse effect" (see Table 4).

**TABLE 4: ADVERSE EFFECT ANALYSIS OF LINES FLAGGED FOR POTENTIAL DISPROPORTIONATE BURDEN**

| Line                      | Proposed change(s)                                                                                                                                                                                                                            | Adverse effect?*                                                                                                                                                                                                                    |
|---------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| MAX Green Line            | Reduce to service between Clackamas TC and Gateway TC only.                                                                                                                                                                                   | No – the MAX Blue and Red lines still serve all stations that the Green Line would no longer serve. In addition, most Green Line stations will have a bus option to and from downtown Portland, including the Line 40 route change. |
| 10-Harold                 | <ul style="list-style-type: none"> <li>• Modify route in SE Portland</li> <li>• Reduce to weekday service only</li> <li>• Reduce span to 7:30am – 6:00pm</li> </ul>                                                                           | Yes – decrease in days and hours with no comparable alternative service within ¼ mile of stops on SE Harold between 101 <sup>st</sup> Ave and 115 <sup>th</sup> Ave.                                                                |
| 16-Front Ave/St Helens Rd | <ul style="list-style-type: none"> <li>• Shorten route to serve Naito Pkwy and Front Ave only, while maintaining limited service to St. Johns and Linnton via Line 15</li> <li>• Reduce service to 2 morning and 2 afternoon trips</li> </ul> | Yes – decrease in hours with no comparable alternative service within ¼ mile of stops on NW Front Ave between 17 <sup>th</sup> Ave and Kitteridge Ave.                                                                              |
| 17-Holgate/Broadway       | Modify route in NE Portland.                                                                                                                                                                                                                  | No – alternative service is available within ¼ mile of all stops the line would no longer serve.                                                                                                                                    |
| 79-Clackamas/Oregon City  | Modify route in Oregon City.                                                                                                                                                                                                                  | No – removal of service on Washington St. will be covered by the route change to Line 34.                                                                                                                                           |
| 82-South Gresham          | Eliminate                                                                                                                                                                                                                                     | Yes – service removal with no comparable alternatives within ¼ mile of most stops on route.                                                                                                                                         |
| 96-Tualatin/I-5           | <ul style="list-style-type: none"> <li>• Modify route to serve Barbur TC.</li> <li>• Reduce to morning and afternoon rush hour service.</li> </ul>                                                                                            | No – removed portion is on I-5 (no stops).                                                                                                                                                                                          |
| 152-Milwaukie             | Eliminate                                                                                                                                                                                                                                     | No – lines 29, 30, and 40 will serve all stops.                                                                                                                                                                                     |

*TriMet's Title VI definition of adverse effect is:*

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

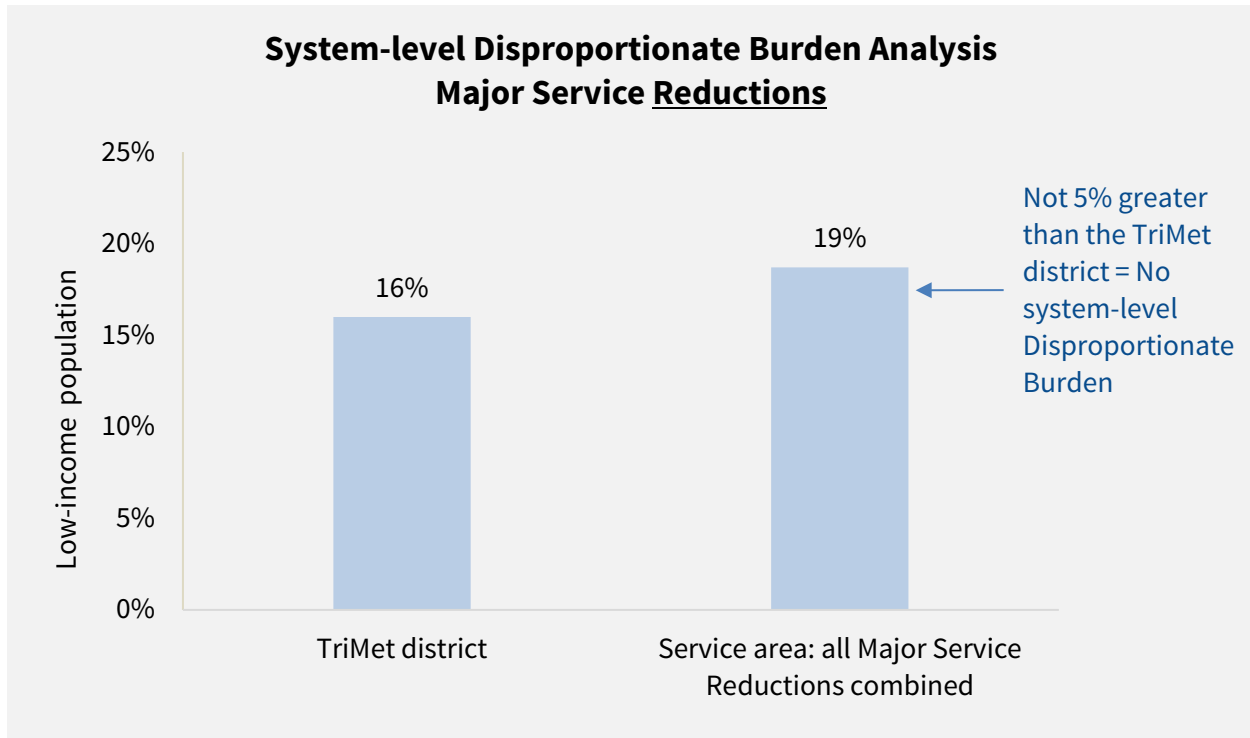
The finding of “adverse effect” on three lines flagged for potential Disproportionate Burden calls for TriMet to take measures to minimize or mitigate impacts, or provide a “substantial legitimate justification” for moving forward with the changes.

Some of these measures are built in to the ASP as it was designed to a) reduce service where ridership is lowest, and b) minimize impacts of cutting or eliminating lines by adjusting routes and merging lines. Additionally, the original ASP shared with the public in early 2026 has been refined to further minimize and mitigate potential impacts by incorporating feedback heard through the community engagement process. See below.

- **10-Harold:** The original proposal included greater service reductions and a different route change. The updated proposal maintains more service and modifies the route to serve the Community Transition Program School.
- **16-Front Ave/St Helens Rd:** The original proposal eliminated this line completely while maintaining limited service to St. Johns and Linnton via Line 15. The updated proposal maintains limited service on the SW Naito/NW Front Ave portion of the Line 16 as much of the segment does not have any alternative service within ¼ mile.
- **82-South Gresham:** Line 82 is proposed for elimination due to low ridership – averaging just 5 boardings per vehicle hour in fall 2025. TriMet’s low ridership service standard is 8 boardings per vehicle hour.

## System-level Analysis

As shown in Figure 2, the population living in service areas of lines where Major Service Reductions would occur is 19% low-income. A potential Disparate Impact would exist if the low-income population was 5 percentage points greater (21%) in these areas than the low-income population of the TriMet district as a whole (16%). Since the low-income population of 19% is just 3 percentage points higher, we find **no system-level Disparate Impact**.



**FIGURE 2:** COMPARISON OF LOW-INCOME POPULATIONS BETWEEN THE TRIMET DISTRICT AND THE SERVICE AREAS OF ALL MAJOR SERVICE REDUCTIONS COMBINED

## Service Increases

While the ASP proposes an overall reduction in service, proposals for some lines include new coverage for those lines as a result of route modifications and/or combining lines. For example, Line 16 is proposed to terminate in the NW Industrial Area of Portland rather than continuing to serve St. Johns and Sauvie Island. Some trips on the Line 15 would be extended to serve the portion previously served by the Line 16, increasing the length of the Line 15 route (for those trips).

No lines are proposed for any increases in frequency or span.

The analysis of these changes aims to ensure minority and low-income populations stand to benefit from the network changes resulting in new connections.

## Major Service Change Test

As shown in Table 5, service change proposals for **15 lines** meet the Major Service Change threshold due to a 15%-or-greater increase in route miles resulting from route modifications and/or combining of lines.

**TABLE 5: PROPOSED FY27 ROUTE LENGTH INCREASES DUE TO MERGES AND/OR ROUTE MODIFICATIONS**

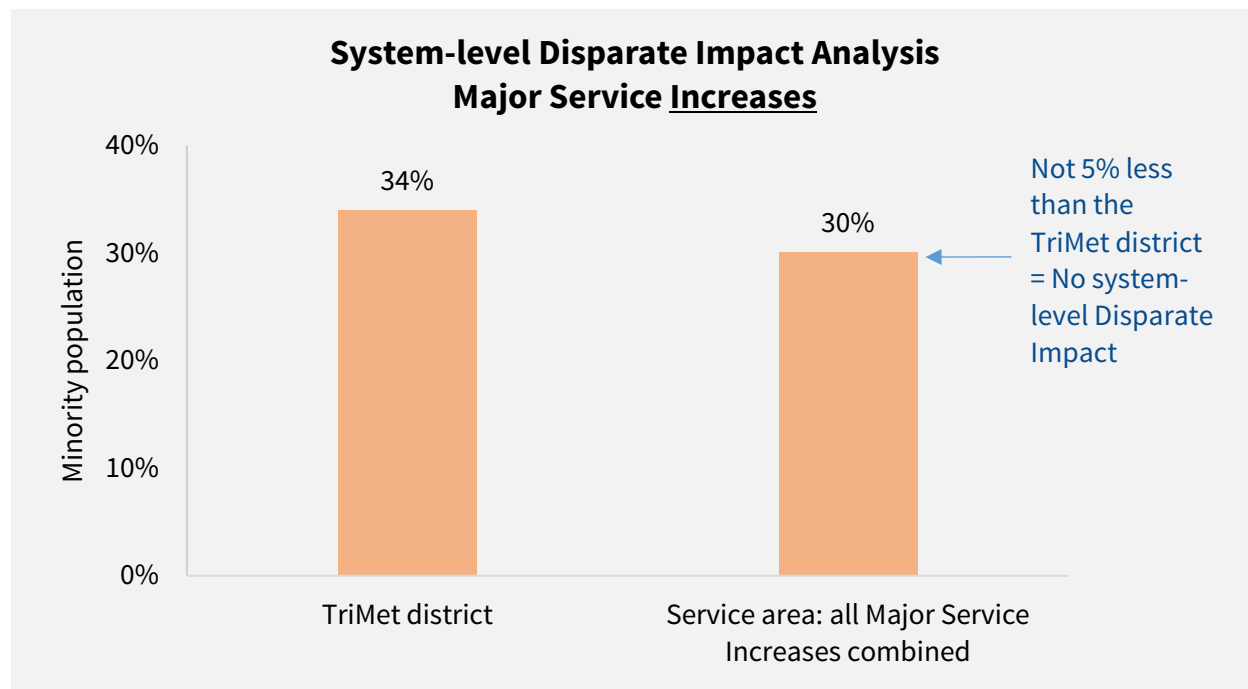
| Line                     | Route Length Increase Only* | Major Service Increase? |
|--------------------------|-----------------------------|-------------------------|
| 4-Fessenden              | +79%                        | Y                       |
| 8-Jackson Park/NE 15th   | +3%                         | N                       |
| 10-Harold                | +16%                        | Y                       |
| 15-Belmont/NW 23rd       | +71%                        | Y                       |
| 17-Holgate/Broadway      | +36%                        | Y                       |
| 19-Glisan                | +44%                        | Y                       |
| 29-Lake/Webster Rd       | +114%                       | Y                       |
| 30-Estacada              | +2%                         | N                       |
| 31-Webster Rd            | +87%                        | Y                       |
| 33-McLoughlin/King Rd    | +14%                        | N                       |
| 34-Linwood/River Rd      | +34%                        | Y                       |
| 40-Tacoma/Swan Island    | +45%                        | Y                       |
| 45-Garden Home           | +42%                        | Y                       |
| 58-Canyon Rd             | +87%                        | Y                       |
| 70-12th/NE 33rd          | +5%                         | N                       |
| 76-Hall/Greenburg        | +15%                        | Y                       |
| 77-Broadway/Halsey       | +1%                         | N                       |
| 79-Clackamas/Oregon City | +31%                        | Y                       |
| 96-Tualatin/I-5          | +77%                        | Y                       |
| 97-Tualatin-Sherwood Rd  | +183%                       | Y                       |

*\*For the purposes of this analysis, route length changes are analyzed for both decreases (i.e., segments removed) and increases (i.e., segments added due to line merges and/or route modifications).*

## Disparate Impact Analysis (Minority Populations)

Disparate Impact analysis of service increases is performed only at the system level and not individual line level. As shown in Figure 3, the population living in service areas of lines where Major Service Increases would occur is 30% minority. Because these are service increases, a potential Disparate Impact would exist if the minority population was 5 percentage points *less* in these areas than the

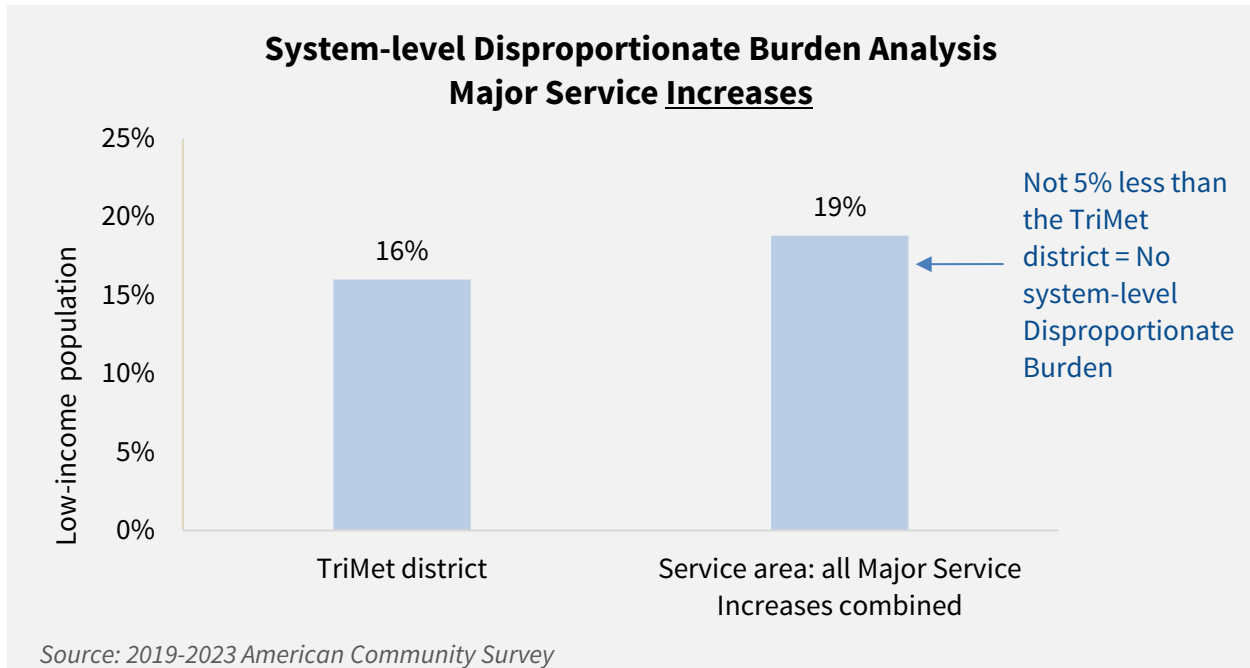
minority population in the TriMet district as a whole (i.e., 29% vs 34% minority, respectively). Since the 30% minority population is just 4 percentage points less in these service areas than the 34% minority population of the TriMet district as a whole, we find **no system-level Disparate Impact**.



**FIGURE 3:** COMPARISON OF MINORITY POPULATIONS BETWEEN THE TRIMET DISTRICT AND THE SERVICE AREAS OF ALL MAJOR SERVICE INCREASES COMBINED

### Disproportionate Burden Analysis (Low-income Populations)

Disproportionate Burden analysis of service increases is performed only at the system level and not individual line level. As shown in Figure 4, the population living in service areas of lines where Major Service Increases would occur is 19% low-income. Because these are service increases, a potential Disproportionate Burden would exist if the low-income population was 5 percentage points *less* in these service areas than the low-income population of the TriMet district as a whole (i.e., 11% vs 16% low-income, respectively). Since the low-income population is actually 3 percentage points *higher* in these service areas, we find **no system-level Disproportionate Burden**.



**FIGURE 4:** COMPARISON OF LOW-INCOME POPULATIONS BETWEEN THE TRIMET DISTRICT AND THE SERVICE AREAS OF ALL MAJOR SERVICE INCREASES COMBINED

## Summary of Results

| Analysis                             | Results                                                                                                                   |
|--------------------------------------|---------------------------------------------------------------------------------------------------------------------------|
| <b>Major Service Reductions</b>      | <b>21 lines</b>                                                                                                           |
| Disparate Impact (minority)          | Line-level: <b>No</b><br>System-level: <b>No</b>                                                                          |
| Disproportionate Burden (low-income) | Line-level: <b>3 lines</b> , adverse effects minimized and/or mitigated to the degree possible<br>System-level: <b>No</b> |
| <b>Major Service Increases*</b>      | <b>15 lines</b>                                                                                                           |
| Disparate Impact (minority)          | <b>No</b>                                                                                                                 |
| Disproportionate Burden (low-income) | <b>No</b>                                                                                                                 |

*\*Analysis of Major Service Increases is performed at the system-level only.*

# Community Engagement

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In addition to the quantitative Title VI analysis, community engagement is crucial to understand and respond to potential impacts of service cuts on riders, including low-income and minority riders. To this end, TriMet made a significant effort to spread awareness and solicit community feedback in September/October 2025 and January 2026.

The following is a high level summary of this effort and its impact on the ASP.

## Methods

TriMet conducted two rounds of outreach, first to understand community priorities related to service cuts overall, then to gather feedback on specific proposed changes. The primary methods were open houses (both virtual and in-person) and surveys, supported by a broad, multi-pronged approach to inform the public about these opportunities to weigh in, which included:

- Dedicated webpage ([trimet.org/servicecuts](https://trimet.org/servicecuts))
- Social media posts
- Print ads
- Signage at bus and MAX stops
- Media releases
- Direct mailers to residents living near impacted routes

TriMet made a targeted effort to engage community members with limited English proficiency by partnering with nine different community-based organizations to host and promote multi-lingual open houses throughout the TriMet district.

In total over the course of the two rounds of outreach, staff engaged with 1,096 attendees at open houses and received 12,944 survey responses.

## Impact

The first round of community engagement yielded the key themes noted in the [Analysis of Proposed Service Changes](#) chapter of this report, shaping the first draft of the FY27 ASP. After receiving feedback on this draft during the second round of engagement, TriMet made the modifications listed in Table 6 to minimize and mitigate potential impacts on riders, resulting in the ASP analyzed in this report.

**TABLE 6: SERVICE CHANGE PROPOSAL MODIFICATIONS RESPONDING TO COMMUNITY FEEDBACK**

| <b>Line</b>                      | <b>Original proposal</b>                                                                        | <b>Modified proposal</b>                                                                                            |
|----------------------------------|-------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------|
| <b>10-Harold</b>                 | Route change in SE Portland<br><br>Reduce service to weekdays, morning and afternoon trips only | Adjust new route to serve the Community Transition Program school<br><br>Reduce service to weekdays 7:30am – 6:30pm |
| <b>16-Front Ave/St Helens Rd</b> | Eliminate, maintaining limited service to St. Johns and Linnton via Line 15                     | Maintain limited service on Naito Pkwy/Front Ave portion (Line 15 still to serve St. Johns and Linnton)             |
| <b>19-Woodstock/ Glisan</b>      | Eliminate service on Glisan                                                                     | Continue to serve Glisan and merge with Line 58, with reduced service                                               |
| <b>29-Lake/Webster Rd</b>        | Streamline route and merge with Line 156                                                        | Remain separate from Line 156 for operational reasons                                                               |
| <b>34-Linwood/River Rd</b>       | Route change                                                                                    | Adjust new route to serve Fred Meyer on Oatfield Rd                                                                 |
| <b>38-Boones Ferry Rd</b>        | Shorten route                                                                                   | Replace with an extended Line 97                                                                                    |
| <b>97-Tualatin-Sherwood Rd</b>   | Eliminate                                                                                       | Retain and merge with Line 38                                                                                       |
| <b>156-Mather Rd</b>             | Merge with Line 29                                                                              | Retain, remaining separate from Line 29                                                                             |