

MEMORANDUM

To: Sam Desue, General Manager

From: Joseph Camper, ADA Compliance Officer

Date: 12/12/2024

Subject: Title VI Equity Analysis for North Mall Operator Layover Facility Project (Project)

Introduction

TriMet would like to acquire a parcel of land in North Downtown Portland in order to construct a bus operator layover facility. TriMet has identified three candidate sites. A map of the potential sites is attached as Exhibit 1.

TriMet is required to conduct a Title VI equity analysis to ensure the site is selected without regard to race, color, or national origin. Per the guidance in FTA Circular 4702.1B, this analysis must:

- Include outreach to persons potentially impacted by the siting of the facility;
- Compare impacts of various siting alternatives;
- Determine if cumulative adverse impacts might result due to the presence of other facilities with similar impacts in the area; and
- Occur before the selection of the preferred site.

TriMet District Demographic Averages

The TriMet district average for minority population is 32% and the district average for low-income population is 16.8%.

Candidate Site Demographics

Erin Hamilton, Senior Geospatial Data Analyst, provided demographic data within a quarter mile of the candidate sites.

510 NW 3rd Ave - The minority population percentage for this vacant site is 24.4%. The low-income population percentage is 46.5% for this site.

550 NW 6th Ave - The minority population percentage for the former Greyhound site is 23.4%. The low-income population percentage is 38.6% for this site.

ODOT Right of Way - The minority population percentage for the ODOT Right of Way site is 25.8%. The low-income population percentage is 59.6% for the ODOT Right of Way site.

Community Outreach

On July 7, 2023, Bernadette Le, Community Affairs Coordinator, sent out postcards to all commercial and residential addresses within a quarter mile of the candidate sites. The postcard is attached as Exhibit 2.

In response to the postcards, TriMet received seven emails and zero voicemails. The emails are attached as Exhibits 3 – 9.

An email from a representative of the Steel Bridge Skatepark Coalition, Exhibit 9, voiced opposition to the ODOT Right of Way site. The representative stated that the site has been planned to be the “ ‘Crown Jewel’ of the Parks Bureau Skate Park Masterplan.” Notably, the representative did not state that the coalition’s opposition related to race, color, national origin, or income.

The other six emails voiced support for different sites.

An informational webinar on the Project was held on July 27, 2023 from 4 p.m. – 5 p.m. Bernadette Le and Joe Recker, Senior Environmental Permits Coordinator, were available on the webinar to answer questions from community members on behalf of TriMet. No community members attended.

In late August, TriMet received a voicemail from a community member who was supportive of all three sites.

Analysis

Minority Population - The minority population percentages of the three sites are lower than the TriMet district average percentage of 32%. The differences in percentages between the three sites are *de minimus*. Selecting any of the three sites will not require displacement of residents or businesses. Regarding cumulative impacts, all three candidate sites are currently not being utilized, the sites are located in a dense area with traffic, and the impacts from the sites are expected to be moderate. TriMet did not receive any opposition to the candidate sites regarding race, color, or national origin.

Therefore, selecting one of the candidate sites does not present a disparate impact on minority populations and no one site will have a greater or lesser impact.

Low-income Population - The low-income population percentages of the three sites are all higher than the TriMet district average of 16.8%. This is due to the substantial number (over 1,700) of regulated affordable housing rental units with income limits within a quarter mile of all three sites.

The ODOT Right of Way site has the highest low-income population percentage and the former Greyhound site the lowest. The 510 NW 3rd Ave site falls in between. This is likely due to the density of the legally-restricted low-income housing rental units within a quarter mile of the candidate sites. Most of those units are clustered south of the candidate sites. Also, several of the buildings containing the nearby affordable housing units are separated from the ODOT Right-of-Way and 510 NW 3rd Ave sites by considerable infrastructure, i.e. freight railroad tracks and Steel Bridge ramps.

Therefore, given the close physical proximity of the candidate sites to each other, the density and location of the affordable housing units, and the lack of community feedback regarding this issue, the low-income population percentages of the candidates, while informative, should not be determinative to selecting a site.

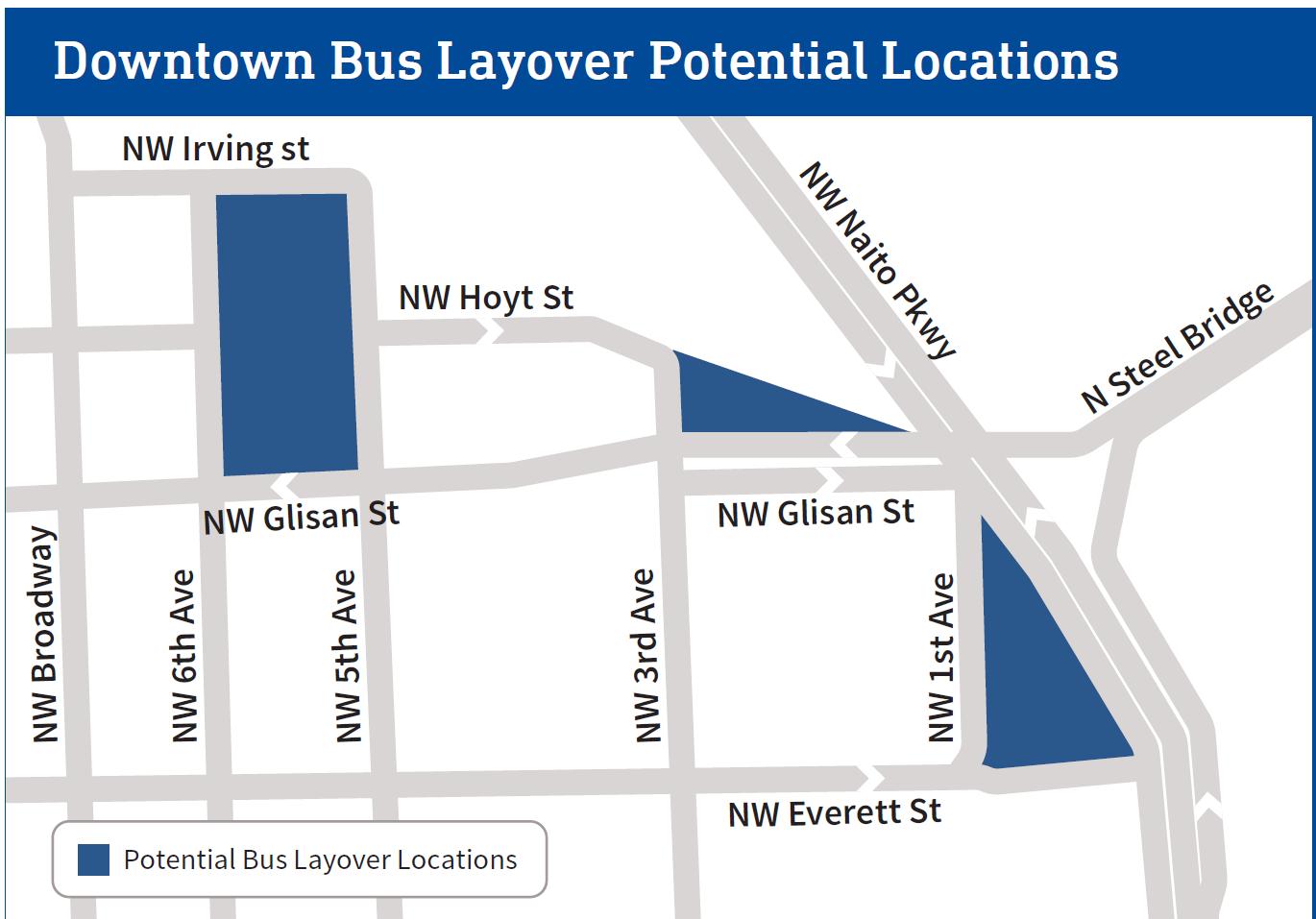
Conclusion

Based on the above analysis, TriMet concluded that selecting any of the candidate sites would not create a disparate impact on minority populations within a quarter mile of the candidate sites. Likewise, given the above considerations, TriMet determined that low-income population percentages would not be determinative to site selection. So, TriMet should base site selection on reasons pertinent to use as a bus layover.

The ODOT Right of Way site has been identified for a new public skate park, as suggested earlier during public outreach. Since that outreach, ODOT transferred the land to the City and the City has dedicated funds to complete design and construction of the skate park by 2029. As a result, this site is no longer available for consideration for the Project.

Therefore, TriMet may select either the former Greyhound site or the 510 NW 3rd Ave site, pending negotiations with either property owner. The former Greyhound site will have the least deadheading and is currently available for acquisition. The former Greyhound site would require the least design risk since it was developed for buses and would require modest improvements to accommodate a bus layover yard. The 510 NW 3rd Ave site will have marginally more deadheading costs and is currently vacant. The site has also been cleared as an isolated parcel as opposed to the Greyhound site, which still contains a building. However, it has increased design risks compared to the former Greyhound site due to the smaller footprint, external permit requirements, and street and traffic modifications to accommodate new bus movements.

Exhibit 1



North Downtown Bus Layover Project

TriMet has begun exploring several potential locations for a new bus layover facility in north downtown Portland. This is where buses would temporarily park while bus operators take their breaks. Currently, buses are temporarily parked on city streets in this area.
(see map on reverse).

The sites being considered are:

510 NW 3rd Ave

550 NW 6th Ave

ODOT property bounded by NW 1st Ave, NW Everett St, and NW Naito Pwy

If you have questions or feedback about these proposed locations, email: communityaffairs@trimet.org or call 503-962-2150, or join us for an info session by Zoom <https://us02web.zoom.us/j/86130851740> on July 27, 2023 from 4-5 pm.

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Language assistance available | Para obtener ayuda en su idioma, llame al
Nếu cần trợ giúp về thông dịch | Доступен языковой перевод | 提供语言翻译
503-238-7433

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503-238-7433

Exhibit 3

From: [Foster](#)
To: [Community Affairs](#)
Subject: North Downtown Bus Layover Project
Date: Monday, July 10, 2023 1:34:24 PM

Caution: This email originated outside of TriMet. Please use caution when opening attachments, clicking links, or responding to requests. Please report any suspicious emails to reportphishing@trimet.org. Thank you for helping TriMet stay safe.

Hello,

I am writing to voice my support for adding a bus layover area to the NW 1st Ave-Naito Pkwy-Everett Street location. I received the flyer in the mail with the list of possible locations. I live on NW Naito Pkwy and I would love to have more Trimet access in this densely populated area! Lots of people on both sides of Naito use the bus and MAX, and I think that adding a bus layover area would not only serve our neighborhood but also keep it safe and usable for everybody.

Can you let me know when you think this decision would be made?

Thanks,

Foster

Exhibit 4

From: [Renee Chavez](#)
To: [Community Affairs](#)
Subject: North Downtown Bus Layover Project
Date: Monday, July 10, 2023 9:46:32 PM

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Dear Trimet,

Operating the North Downtown Bus Layover Project at NW 1st Ave., NW Everett St, and NW Naito Pkwy is highly supported by the residents of McCormick Pier. I believe the location is beneficial to the community and hope that the location is selected.

Sincerely,
Renee Chavez

Exhibit 5

From: [Joseph Lopez Jr.](#)
To: [Community Affairs](#)
Subject: North Downtown Bus Layover Project
Date: Tuesday, July 11, 2023 10:54:36 AM

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> Dear Trimet,
>
> Operating the North Downtown Bus Layover Project at NW 1st Ave., NW Everett St, and NW Naito Pkwy is
highly supported by the residents of McCormick Pier. I believe the location is beneficial to the community and hope
that the location is selected.
>
> Sincerely,
> Joseph Lopez

Sent from my iPhone

Exhibit 6

From: [Paul Park](#)
To: [Community Affairs](#)
Subject: North downtown bus layover comment
Date: Wednesday, July 12, 2023 4:10:09 PM

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Can't you re-task the old Greyhound terminal for this purpose?
It's designed to service buses and has the infrastructure needed to keep drivers safe.
Plus it would add some meaningful activity to a building that has been sitting idle.

--

Paul S. Park, M.D.
[Tuality/OHSU Urgent Care](#)
[Urgent Care West Maui](#)
[Minit Medical](#)
[Dante's](#)
[Star Theater](#)
[Qi Fine Chinese Teas](#)

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Exhibit 7

From: [Catherine Cleveland](#)
To: [Community Affairs](#)
Subject: North Downtown Bus Layover Project
Date: Wednesday, July 12, 2023 6:33:32 PM

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Hello,

Thank you for the opportunity to provide feedback on these options. I would be happy to see the property at 550 NW 6th Ave used for this project. It would make the Hoyt & 5th Max station feel safer in the early mornings and at night. The Trimet buses and operators who are generally near the 5th and Glisan station lend a feeling of if not safety, at least awareness that the area isn't deserted.

Thank you,

Catherine

Exhibit 8

From: [Velma Applegate](#)
To: [Community Affairs](#)
Subject: North Downtown Bus Layover Project
Date: Friday, July 14, 2023 6:09:54 PM

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I live very near the three proposed bus layover locations. The 3rd avenue location just isn't large enough to accommodate all of the buses that currently layover parked along Irving and 5th streets. The ODOT site is a bit larger, but is a bit out of the way for some of the routes. The 6th avenue site can accommodate as many buses as the ODOT site and the 3rd avenue site combined. It is also the most convenient site for all the bus routes currently laying over on the streets in North downtown. It also allows passengers to directly connect with max, and Amtrak. It is by far the best choice.

Please be aware that I live on NW Naito Pkwy, so the 6th avenue site is actually the least convenient for me to catch my bus, however, I still feel it is the best choice for both the community and Trimet.

Thank you for reading this.

Sincerely
Velma L
Applegate

Exhibit 9

From: [Community Affairs](#)
To: [Le, Bernadette](#)
Subject: FW: Old Town Bus Layover Project
Date: Tuesday, August 15, 2023 9:36:10 AM
Attachments: [image001.png](#)

From: Ryan Hashagen <portlandpedals@gmail.com>
Sent: Wednesday, August 2, 2023 1:48 PM
To: Community Affairs <CommunityAffairs@TriMet.org>
Subject: Old Town Bus Layover Project

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Hello Trimet,

I am reaching out on behalf of the Steel Bridge Skatepark Coalition to oppose a new bus layover location on the ODOT property bounded by NW 1st Ave, NW Everett, and NW Naito. This site has long been planned to be the "Crown Jewel" of the Parks Bureau Skatepark Masterplan.

There are other better layover locations being proposed.

Cheers,
Ryan Hashagen
(They/He)
360.510.1818
Steel Bridge Skatepark Coalition

