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2014 Regional Transportation Plan and 2015-2018 Metropolitan Transportation Improvement Program Environmental Justice and Title VI

Adoption Draft Report

July 17, 2014

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Clean air and clean water do not stop at city limits or county lines. Neither does the need for jobs, a thriving economy, and sustainable transportation and living choices for people and businesses in the region. Voters have asked Metro to help with the challenges and opportunities that affect the 25 cities and three counties in the Portland metropolitan area.

A regional approach simply makes sense when it comes to providing services, operating venues and making decisions about how the region grows. Metro works with communities to support a resilient economy, keep nature close by and respond to a changing climate. Together we're making a great place, now and for generations to come.

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Metro is the federally mandated metropolitan planning organization designated by the governor to develop an overall transportation plan and to allocate federal funds for the region.

The Joint Policy Advisory Committee on Transportation (JPACT) is a 17-member committee that provides a forum for elected officials and representatives of agencies involved in transportation to evaluate transportation needs in the region and to make recommendations to the Metro Council.

The established decision-making process assures a well-balanced regional transportation system and involves local elected officials directly in decisions that help the Metro Council develop regional transportation policies, including allocating transportation funds.

The preparation of this report was financed in part by the U.S. Department of Transportation, Federal Highway Administration and Federal Transit Administration. The opinions, findings and conclusions expressed in this report are not necessarily those of the U.S. Department of Transportation, Federal Highway Administration and Federal Transit Administration.

Introduction to the Environmental Justice and Title VI Assessment for the 2014 Regional Transportation Plan and 2015-18 Metropolitan Transportation Improvement Program

Metro values equity

Our region is stronger when individuals and communities benefit from quality jobs, living wages, a strong economy, stable and affordable housing, safe and reliable transportation, clean air and water, a healthy environment, and sustainable resources that enhance our quality of life. We share a responsibility as individuals within a community and communities within a region. Our future depends on the success of all, but avoidable inequities in the utilization of resources and opportunities prevent us from realizing our full potential. Our region's population is growing and changing. Metro is committed with its programs, policies and services to create conditions which allow everyone to participate and enjoy the benefits of making this a great place today and for generations to come.

In 2010, the Metro Council adopted equity as one of the region's six desired outcomes. In 2012, the Metro Council initiated the equity strategy program as an organizing framework to incorporate and apply equity more consistently across its program, policies and services – in collaboration with community, city and county partners. As the equity strategy develops, new tools and strategies will be available to Metro and its partners to identify inequities and opportunities to ensure more equitable outcomes in Metro's programs, policies and service.

Equity and Civil Rights

Civil rights are rights and freedoms protected and enforced by the government. These rights are inextricably tied to equity, most notably those that provide for equality in the public sphere as articulated in the Civil Rights Act of 1964, but equity as a policy, effort or movement is not limited to federal or state mandates or protections. Metro's equity strategy program seeks to:

- strengthen and build new and existing partnerships
- increase external knowledge base around Metro's roles and responsibilities and support capacity building for partners to engage with Metro
- build internal capacity around equity
- build on existing regional and national equity measurement efforts to create a strong foundation for the program.

These efforts will depend and build on previous advocacy work tied to the Civil Rights Act, but they can be developed outside of any limitations or strictures of agency guidance or judicial interpretation.

Current federal civil rights guidance with which Metro must comply is based on Title VI of the Civil Rights Act and the Executive Order on Environmental Justice. Though federal regulators recognize the interrelatedness of the two, analysis and terminology in federal guidance often diverges. As demonstrated in the comments received on the public review draft of this assessment, this divergence led to frustration. Metro staff recognizes that distinctions made in between terms such as "disparate impact" and "unequal distribution of benefits and burdens" are often inconsequential in the terms of equity advocacy. Likewise, the distinction between Title VI and the Executive Order on Environmental Justice is sometimes seen as unnecessary, as is the distinction between equity and civil rights.

Once fully developed, Metro's equity strategy can act as the primary framework for Metro's demonstration of compliance with these civil rights requirements, creating greater accessibility to the analysis and findings. Technical memos can then be issued to federal regulators to demonstrate how their requirements, either under the Title VI or Executive Order on Environmental Justice guidance, have been met. In order to demonstrate compliance to federal regulators for this 2014 Regional Transportation Plan and 2015-18 Metropolitan Transportation Plan assessment, however, Metro has grounded its analysis and terminology in the federal guidance on Title VI and Environmental Justice.

Title VI and Executive Order on Environmental Justice requirements

Federal requirement	Analytical requirement	Public involvement
Executive Order on Environmental Justice	Demographic profile and mapping Benefits and burdens analysis	Public involvement plan
Title VI of the Civil Rights Act	Demographic profile of the metro area that includes identification of locations of people of color populations in aggregate Demographic maps that overlay the percent people of color and non- people of color populations as identified and charts that analyze the impacts of the distribution of state and federal funds in the aggregate for public transportation purposes Disparate impact analysis	Title VI notices of compliance/instructions to the public about filing a Title VI complaint List of Title VI related investigations A public participation plan/language assistance plan for limited English proficiency Description of non-elected committees racial breakdown of members Description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process

Stages of equity and civil rights engagement and assessment

This assessment is one part of local and regional responsibilities toward equity and civil rights as they relate to transportation planning. The analysis below takes a programmatic look at the region's short- and long-term planned investments, looking at the region (and its demographics) as a whole and the planned investments in total. Other planning processes that lead into the regional process of the Regional Transportation Plan or the Metropolitan Transportation Improvement Program allow for more localized, even project-specific, assessments. Likewise, the levels of engagement of these communities of concern, or of underrepresented communities, generally, depend on the questions to be asked during the different stages. The table below provides, on a broad level, the different stages of equity and civil rights engagement and assessment in the development of the RTP or MTIP.

Development stage of regional program	Engagement and assessment
[Updating the Regional Transportation Plan]	
Regional development of RTP policies that provide the framework for development of city and county transportation system and other plans for projects to be added to regional priority lists.	Regional engagement of communities of concern to help develop policies and identify needs.
Cities, counties and agencies independently develop transportation system plans and other plans that call for transportation projects.	Local engagement of communities of concern to develop policies, plans and projects. Local assessment of impacts on these communities.
Cities and counties work together on the county level to prioritize projects for the regional priority list.	Some local engagement of communities of concern to develop countywide lists.
The RTP brings city, county regional and state priority projects together to create a regional priority list.	Some regional engagement of communities of concern on regional list This assessment of RTP regarding effects on these communities Regional mitigation as needed.
[Developing the Metropolitan Transportation Improvement Program to project development]	
Cities and counties pursue opportunities for federal funds for short-term priorities, primarily through ODOT and Metro.	Local consideration of impacts on communities of concern.
ODOT, Metro, TriMet and SMART prioritize projects for funding through independent processes.	Equity assessment and consideration through agency prioritization processes. Local and regional engagement on priority projects.
The MTIP reports how all federal transportation money will be spent in the region over the next four years, bringing together funding packages from ODOT, Metro, TriMet and SMART.	This assessment of MTIP regarding effects on communities of concern. Regional mitigation as needed.
Funded projects are moved into project development by the city, county, regional or state agency that sponsored them through the funding process.	Project-specific engagement of communities of concern to develop the project. Assessment of impacts of the project on these communities.
The project moves into construction, serving the identified needs.	Implementation of mitigation strategies for disparate impacts that could not be avoided or fully minimized.

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Chapter 1: Purpose of This Report

What is Metro?

Metro is an elected regional government serving more than 1.5 million residents in Clackamas, Multnomah and Washington counties and the 25 cities in the Portland region. Metro is also the Portland area's designated Metropolitan Planning Organization (MPO). As the designated MPO, Metro develops the Regional Transportation Plan and the Metropolitan Transportation Improvement Program.

What is a Metropolitan Planning Organization?

The United States Department of Transportation (USDOT) requires any urban area with populations equal or greater than 50,000 have a special purpose government which coordinates transportation policy, planning and funding for the entire surface transportation system in the region. This is in recognition transportation needs and solutions cross jurisdictional boundaries (e.g. a roadway which crosses between two cities) and there are many different agencies which plan for and implement the transportation system.

As federally designated MPO, Metro is the lead agency responsible for planning and setting the policies for regional transportation system as well as scheduling the spending of federal transportation funds in the Portland area. For Metro, this results in the development and updates of two documents: the regional transportation plan (RTP) and the metropolitan transportation improvement program (MTIP). The RTP serves as the long-range transportation policy document which outlines the vision for the region's urban transportation system and sets a baseline of priority investments. The MTIP, as the RTP's companion, serves as a snapshot of the where federal transportation funds are anticipated to be spent over the course of the first four federal fiscal years of the RTP and illustrates the region near-term transportation priorities.

Federal regulations require planning and policy documents (e.g. RTP and MTIP) to be "constrained to reasonably expected revenue." This means Metro, in working with partner agencies, must make long-term (for the RTP) and short-term (for the MTIP) projections of federal transportation revenue expected to come to the region based on federal transportation authorization as well as any significant state, regional, or local sources. The projected revenues serve as a capacity parameter to determine the overall amount of long-term and short-term transportation investments the region can anticipate making without over-expending or becoming unconstrained. These revenue projections are updated with each RTP and each MTIP cycle.

What is the Regional Transportation Plan?

The Regional Transportation Plan assesses long-term transportation needs and acts as a blueprint to guide transportation investments in the Portland metropolitan region over the next 20 or more years. The plan is updated every four years, allowing the region to have both the certainty of long-term goals and the flexibility to respond to new conditions, priorities change, or new needs emerge.

What is the Metropolitan Transportation Improvement Program?

The Metropolitan Transportation Improvement Program (MTIP) is the federally mandated four-year schedule of expenditures (i.e., spending) of federal transportation funds as well as significant state and local funds in the Portland metropolitan region. As a report, the MTIP provides the upcoming four-year implementation schedule of transportation projects in the Portland region. The MTIP also demonstrates how the transportation projects comply with federal regulations regarding project eligibility, air quality impacts, environmental justice and public involvement. The MTIP serves as the first four years of the region's long-range transportation plan implementation strategy.

What is the relationship between the Regional Transportation Plan and the Metropolitan Transportation Improvement Program?

The RTP is the guiding policy document which outlines the long-range vision of the region's urban transportation system. As a component of the policy document, it identifies priority transportation investments (i.e. projects and programs) for the next 25 years which will help achieve the long-range vision. Therefore, the RTP list represents priorities beyond what can be afforded by the region in any given year. For projects to be eligible to receive federal transportation funding, they must be included in the Regional Transportation Plan (RTP).

The MTIP process is used to determine which projects included in the RTP will be given funding priority year to year. The Metropolitan Transportation Improvement Program (MTIP) is a four-year expenditure plan for the Portland urban area. The projects in the MTIP are those which have secured federal or state transportation funding. The federal or state transportation funding may encompass a portion or the entire project cost, but ultimately the MTIP can be seen as the implementation of the first four years of the RTP.

How does the Regional Transportation Plan and the Metropolitan Transportation Improvement Program relate to other federal mandates?

The contents of this report are intended to satisfy several federal requirements outlined in this section. At the federal level are civil rights protections afforded to persons against discrimination in federal programs on the basis of race, color, or national origin; and federal environmental justice objectives aimed at avoiding disproportionately high and adverse effects on people of color and low-income populations. This section describes each set of requirements and summarizes Metro's specific responsibilities and commitments in each area.

Title VI of the Civil Rights Act of 1964: The Right of Non-discrimination in Federally Funded Programs on the Basis of Race, Color, or National Origin

Title VI of the Civil Rights Act of 1964 states that "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."¹ Title VI further authorizes federal agencies that make grants (for example, the U.S. Department of Transportation) to promulgate regulations to effectuate compliance with the law's provisions. Metro, as an agency which receives federal funding to plan for transportation investments and program funding for the Portland metropolitan area is responsible for ensuring its transportation activities do not discriminate based on race, color, or national origin.

Executive Order 12898 on Environmental Justice: Avoiding, Minimizing, or Mitigating Disproportionately High and Adverse Effects on Low-Income and Minority Populations

Environmental justice is a concept related to civil rights but distinct from Title VI. Whereas Title VI provides legal protection from discrimination in federal programs on the basis of race, color, or national origin, the Executive Order on Environmental Justice relates to an administrative framework for federal agencies to ensure their programs and activities incorporate environmental justice principles and do not disproportionately burden low-income people and people of color. Metro, as an agency is responsible for ensuring its activities do not cause disproportionate burden on low-income people and people of color or must avoid, minimize, or implement mitigation.

What is required of metropolitan planning organizations per Executive Order 12898 and Title VI of the Civil Rights Act of 1964?

In fulfilling federal Title VI and Environmental Justice mandates, Metro demonstrates federally MPO-designated responsibilities (e.g. regional transportation planning and programming) undergo two main activities: public involvement and programmatic assessment. These two activities often overlap and inform one another. For public involvement, Metro must develop a public involvement program which meets, but not limited to, the federally mandated requirements and proper demographic assessments are completed to shape public involvement strategies. For the programmatic assessments, Metro must analyze whether its MPO activities cause disproportionate burdens and/or disparate impacts on people of color, limited English proficiency, and low-income populations. A summary of the requirements and the activities can be found in Table 1.

Table 1. Title VI	and Environmental Justice Requirements	
Federal	Analytical Requirement	Public Involvement

¹ Title VI of the Civil Rights Act of 1964.

Requirement		
Environmental Justice	• Demographic profile and mapping • Benefits and burdens analysis	• Public involvement plan
Title VI	• Demographic profile of the metro area that includes identification of locations of people of color populations in aggregate • Demographic maps that overlay the percent people of color and non-people of color populations as identified and charts that analyze the impacts of the distribution of state and federal funds in the aggregate for public transportation purposes • Disparate impact analysis	• Title VI notices of compliance/instructions to the public about filing a Title VI complaint • List of Title VI related investigations • A public participation plan/language assistance plan for limited English proficiency • Description of non-elected committees racial breakdown of members • Description of the procedures by which the mobility needs of minority populations are identified and considered within the planning process

Public Involvement

MPOs are required to have a proactive public involvement process that provides complete information, timely public notice, full public access to key decisions and supports early and continuing involvement of the public in developing plans and TIPs and meets other requirements and criteria, including the requirement to seek out and consider the needs of those traditionally underserved by existing transportation systems, which includes low-income and minority households.

To help meet these outreach obligations, Metro has created a Public Engagement Guide that offers best practices for assessing communities of concern and public engagement strategies. The Public Engagement Guide establishes consistent guidelines to ensure people have meaningful opportunities to be involved in the regional planning process. The guide also provides examples of the tools and techniques that Metro may use to communicate with and receive input from the public. The guide provides a non-discrimination checklist to underscore the importance of equitable engagement and decision-making practices. Metro also has a Limited English Proficiency Plan that guides compliance with federal guidelines for translation services and notifications, helping to provide access for people who do not speak English well.

Analytical Requirements

In addition to the public involvement requirements, MPOs must conduct demographic analysis and program assessments to determine the effects policy decisions may have on people of color, limited English proficiency, and low-income populations. The outcomes of the demographic analysis and program assessments are intended to draw conclusions on methods through which agency programs can improve the impacts of policy decisions on environmental justice communities and inform public involvement approaches. Per federal requirements, the analytical components of Environmental Justice and Title VI must include:

- Conducting a demographic analysis of the region to identify locations of specific environmental justice and Title VI populations;
- Conducting a benefits and burdens analysis of regional planning and programming activities; and
- Conducting a disparate impact analysis for all federal and state public transportation investments in aggregate on planning and project development activities.

The analysis must demonstrate that policies, planning, and decisions do not unintentionally discriminate against or have adverse impacts on communities of color.²

² Discovery of such a discriminatory effect or adverse impact does not prevent an action, but if the agency does move forward it must identify a legitimate justification for the policy and what alternatives were explored.
2014 RTP and 2015-2018 MTIP Environmental Justice and Title VI Report

As a result, Metro conducts demographic mapping and analysis using the most recent U.S. Census Bureau datasets with each update of the RTP and development of the four-year MTIP to provide as up-to-date contextual information to partners to consider when recommending transportation priorities for inclusion in the RTP and the MTIP. Previous demographic analysis includes the 2016-2018 Regional Flexible Fund Allocation (RFFA) demographic resource maps and background paper titled “Environmental Justice in Metro’s Transportation Planning Process: Implications for the 2035 Regional Transportation Plan Update and the 2008-2011 Metropolitan Transportation Improvement Program.” Additionally, Metro conducts a programmatic level benefits and burdens analysis of its transportation planning and programming efforts.

As of October 2012, two finalized circulars issued by the Federal Transit Administration (FTA) outline specific new guidance about how to meet the requirements of Environmental Justice and Title VI for all agencies which receive FTA funds. Of some of the substantive changes made in the circulars, one new requirement for MPOs is to conduct a disparate impact analysis of regional transportation plans (RTP) and transportation improvement programs (TIP). The analysis must demonstrate whether policies, planning, and decisions unintentionally discriminate against or have disparate impacts on communities of color or limited English proficiency populations or disproportionate burdens on low-income populations or communities of color.³

If the results of the assessment identify a disparate impact, federal regulations direct Metro to investigate alternative policies or practices that could achieve the same policy objectives or to identify legitimate policy justification for the impact. If a disproportionate burden is found, Metro would need to consider mitigation or make adjustments to current and/or future policies, programs or investments to prevent disproportionate burdens and unintentional discrimination to environmental justice communities where practicable.⁴

Purpose and Content of the Environmental Justice and Title VI Assessment

The purpose of this report is to address the analytical requirements of Environmental Justice and Title VI regulations. A key distinction of the 2014 RTP and 2015-2018 MTIP Environmental Justice and Title VI assessment compared to other analyses is that the assessment is being conducted programmatically for the financially constrained 2014 RTP and the 2015-2018 MTIP. The assessment focuses on the packages of proposed long-term (represented by the financially constrained 2014 RTP) and short-term (represented by the 2015-2018 MTIP programming) investments by looking at investments aggregate and categorically to determine the effects they have on the five identified communities of concern including: young persons, older adults, people of color, limited English proficiency, and low-income.

The 2014 RTP process and each of the funding allocation processes leading to the projects proposed for funding in the 2015-18 MTIP considered transportation needs of underserved populations, along with other policy objectives, when nominating and selecting projects. This assessment now considers the potential burdens and benefits of the final selection of projects as a whole on communities of concern and whether the distribution of the public transit investments, under the guidance of FTA’s curricular, have a disparate impact on these communities. The assessment is for the proposed set of investments only; it does not account for transportation investments implemented from previous RTP or MTIP.

Transportation investments, identified as projects in both the 2014 RTP and the 2015-2018 MTIP, are not assessed individually for specific effects on communities of concern. Project sponsors are required to evaluate individual transportation projects during project development through the National Environmental Protection Act (NEPA) environmental assessment process in order to reflect the conditions when the project is implemented. The project development and the NEPA process is where the findings of individual project effects as it related to impacts on environmental justice communities are made.

Outline of This Report

This report documents the results of an environmental justice and Title VI assessment for the 2014 Regional Transportation Plan and 2015-2018 Metropolitan Transportation Improvement Program (MTIP). The assessment includes both federally required nondiscrimination (Title VI) and environmental justice analyses. The report demonstrates Metro’s compliance as a metropolitan planning organization (MPO) with federal

³ FTA Circular 4702.1B Chapter VI Section 7(a)

⁴ 2014 RTP and 2015-2018 MTIP Environmental Justice and Title VI Report

requirements related to Title VI and environmental justice in the RTP development process, and to help regional policymakers, local partners, and the general public understand the regional implications of implementing transportation priorities for the region's communities of concern (as they are defined in this report), by examining the distribution transportation investments relative to the location of concentrated communities of concern and the rest of the region.

This report is divided into five sections. The first section provides an overview of Metro as a metropolitan planning organization and its duties under federal mandates related to implementing Title VI and environmental justice regulations in regional transportation planning and programming. The second section of this report provides an overview of the methodology employed in the environmental justice and Title VI assessment. The second section also sets the backdrop by outlining the region's transportation investments programmatically and identifying the locations of communities of concern. The same methodology is employed for both the 2014 RTP and the 2015-2018 MTIP.

The third and fourth sections provide a summary of the results in the context of either the 2014 RTP or the 2015-2018 MTIP. A set of results will be presented for the environmental justice benefits and burdens assessment and the disparate impact analysis in the 2014 RTP section and the 2015-2018 MTIP section. The decision to separate the results is for the purposes of developing findings and conclusions based on a long-term and short-term outlook of local and regional transportation investments. As the 27-year planning and policy document for the regional transportation system, the 2014 RTP identifies the local and regional transportation priorities to make eligible federal transportation funding. Whereas, the 2015-2018 MTIP represents the local and regional priorities that have been selected to receive federal or state transportation funding in the upcoming four years. The final fifth section will highlight the findings which emerged through the public comment regarding the analysis and recommendations.

Relationship to Metro's Equity Strategy

While federal mandates require MPOs like Metro to comply with environmental justice and Title VI mandates, Metro's own agency values embed equity as a desired outcome for all agency activities, including those outside of the agency's federal responsibilities.

In 2011, the Metro Council directed staff to develop an overarching framework which would guide how equity is incorporated into the work programs (e.g. sustainability and solid waste, transportation and land use planning, Oregon Zoo, etc.) across this agency. Due to the effort being currently underway, at this time the indicators and metrics have not been identified and were not incorporated into the environmental justice and Title VI assessment for the 2014 RTP and the 2015-2018 MTIP. Future updates of the RTP and the development of the MTIP may use the outcomes and indicators from Metro's equity strategy to inform the environmental justice benefits and burdens analysis required by Executive Order 12898 and the disparate impact analysis required by Title VI of the Civil Rights Act of 1964.

In pertaining to equity, there are many more areas of interest and indicators which community advocates find of value. At this time, this evaluation is unable to address all of these concerns and is limited to the federal requirements. However, as the agency framework pertaining to equity continues to evolve, it will guide future equity related transportation planning and programming work, and in turn the work program and the methods used to conduct environmental justice and Title VI assessments on transportation plans, policies, and programs for satisfying federal obligations.

Chapter 2: Overarching Methodology for the Environmental Justice and Title VI Assessment

Scope of the Environmental Justice and Title VI Assessment

The purpose of the 2014 RTP and 2015-2018 MTIP Environmental Justice and Title VI assessment is to evaluate programmatically whether the long range regional transportation plan and the four-year programming of federal transportation funds are causing either:

- 1) a disproportionate burden on communities of concern (as required by Executive Order 12898); and/or
- 2) a disparate impact on communities of concern as it pertains to public transportation investments (as required by Title VI).⁵

For the evaluation, the 2014 RTP and 2015-2018 MTIP, Metro is building upon previous analytical efforts and employing a new quantitative method for the assessment. To analyze the programmatic effects of transportation policy, planning, and programming the 2014 RTP and 2015-2018 MTIP Environmental Justice and Title VI assessment comprises of three processes. The three processes are intended to build upon each other where the results of each process inform core elements of the subsequent process until the development of the report findings and recommendations. Further information on each process is described below.

- Process 1: Definitions, Thresholds, and Methodology Approach Development – The first phase involved identifying and defining the communities of concern for the assessment, the thresholds for locating concentrations of each community of concern, and overall quantitative and qualitative methodology for the assessment.
- Process 2: Quantitative Analysis of the 2014 RTP and 2015-2018 MTIP Transportation Investments – The second phase illustrates the results of the quantitative methodology applied to the region's short-term (via the 2015-2018 MTIP) and long-term (via the 2014 RTP) transportation investments. The quantitative analysis examines where transportation investments are proposed in the long-term and where transportation investments are being made in the short-term relative to concentrations of communities of concern within the region. The assessment uses benchmarks of transportation investment per person per acre to determine whether there is a presence of disproportionate or disparate investments.
- Process 3: Qualitative Evaluation of the 2014 RTP and 2015-2018 MTIP Quantitative Assessment – The third phase focuses on understanding how the transportation investments proposed for the region in the short-term and the long-term affect communities of concern at a programmatic level. Using the results of the quantitative analysis which will identify areas of programmatic disproportionate and disparate investment, the qualitative analysis will ask what overall the results mean as it pertains to burdens or benefits to communities of concern. For the qualitative analysis a 30-day public comment period will serve as the method for gathering feedback on whether the disproportionate transportation investments, if any, cause a benefit or burden to different communities of concern.

Process 1 – Definitions, Thresholds, and Methodology Approach Development

To begin the 2014 RTP and 2015-2018 MTIP Environmental Justice and Title VI assessment, setting up overall methodology approach and defining certain key aspects to the methodology were critical to moving forward. Much of this process entailed research and conducting engagement with technical stakeholders to establish the overall methodology and reach consensus on the key aspects of the methodology. The main products to emerge from this process include:

- Five identified communities of concern to evaluate for the analysis;
- Definitions for the five identified communities of concern;
- Thresholds for identifying the locations of the communities of concern;

⁵ A disparate impact refers to policies, practices, rules, or other systems that appear to be neutral, but result in a disproportionate **impact** on protected groups.

- Determining the scope of the transportation investments for the quantitative analysis; and
- Establishing the transportation investments, analysis geography, and unit of analysis.

Background Research

To develop the approach for conducting the 2014 RTP and 2015-2018 MTIP Environmental Justice and Title VI assessment, Metro staff began by conducting research, looking at the following resources:

- Previous benefits and burdens analysis for the MTIP and RTP;
- Previous stakeholder input from the environmental justice task force formed for the 2014-2015 Regional Flexible Fund Allocation process;
- Other social equity-related tools (e.g. Coalition for a Livable Future's Equity Atlas)
- Benefits and burdens analyses conducted by other peer agencies; and
- Participation at TriMet community forums on transit equity (late 2013).

Over the summer of 2013, Metro hired a Ph.D. candidate to research and propose communities of concern, thresholds for identifying the locations of the communities of concern, and an initial quantitative methodology for the benefits and burdens analysis and disparate impact analysis. Based on the research work conducted by the Oregon Fellow, Metro staff developed a set of proposed communities of concern and thresholds for identifying the locations of those communities. Table 2-1 illustrates the proposal.

Table 2-1: Proposed Communities of Concern Definitions and Thresholds for Identifying Concentrated Locations

<i>Community of Concern</i>	<i>Proposed Definition</i>	<i>Proposed Threshold</i>
People of Color	Persons who identify as any of the following races: Black or African American, American Indian or Alaska Native, Asian, Native Hawaiian or other Pacific Islander, some other race or multiple races AND persons who identify ethnically as Hispanic or Latino in the 2010 U.S. decennial census.	Option 1: Census blocks where the total people of color population (by percent) is greater than the regional rate of people of color population (by percent). The regional rate is estimated at 33%; or Option 2: Census blocks where the total people of color population (by percent) is greater than one standard deviation of the regional rate of people of color population (by percent) For the Metro region, one standard deviation greater than the regional rate is estimated at 36%.
Limited English Proficiency	Persons who identify in the U.S. Census Bureau's American Community Survey as speaking English "less than very well."	"Regardless of language, census tracts that have more than an 8.71% LEP population." The 8.71% represents the regional rate of over-5 years of age population who "do not speak English very well" regardless of native language.
Older Adult	Persons who are 65 years of age or older as of the U.S. Census Bureau's 2010 census.	Option 1: Census blocks where the total older adult population (by percent) is greater than the regional rate of older adult population (by percent). The regional rate is estimated at 10.2%; or Option 2: Census blocks where the total older adult

		population (by percent) is greater than one standard deviation of the regional rate of older adult population (by percent). For the Metro region one standard deviation greater than the regional rate is estimated at 10.3%.
Young Person	Persons who are 17 years of age or younger as of the U.S. Census Bureau's 2010 census.	Option 1: Census blocks where the total young person population (by percent) is greater than the regional rate of young person population (by percent). The regional rate is estimated at 22%; or Option 2: Census blocks where the total young person population (by percent) is greater than one standard deviation of the regional rate of young person population (by percent). For the Metro region one standard deviation greater than the regional rate is estimated at 23%.
Low Income	Option 1: persons in a household living 200% of the federal poverty guidelines; or Option 2: persons in a household living 185% of the federal poverty guidelines; or Option 3: persons in a household living 150% of the federal poverty guidelines	Option 1: Census tracts where the total low-income population (by percent) is greater than the regional rate of low-income population; or Option 2: Census tracts where 20% or more of the population are below the poverty guideline as defined by question 9; or Option 3: Census tracts where the total low-income population (by percent) is one standard deviation greater than the regional rate of low-income population (by percent); or Option 4: Census tracts where the per capita income is lower than the one person poverty guideline from the U.S. Department of Health and Human Services Department. For reference, the one person poverty guideline for 2014 is \$11,670.

Two additional communities of concern were added beyond the three communities required by federal mandates. These communities are young persons and older adults. The reason for adding the two additional communities of concern related to the availability of population data. This analysis also ensures compliance with the Age Discrimination Act of 1975, which is seen as related to Title VI due to its focus on non-discrimination.⁶ Some

⁶ The Age Discrimination Act of 1975 states, in part: "no person in the United States shall, on the basis of age, be excluded from participation, in be denied the benefits of, or be subjected to discrimination under, any program or activity receiving Federal financial assistance." 42 U.S.C. § 6102.

additional communities of concern were proposed, but eliminated based on the lack of reliable data availability. These communities included:

- Zero vehicle households
- Housing and Transportation Cost Burden Households

Technical Feedback – Proposed Definitions and Thresholds

In January 2014, Metro administered an online survey with the proposed definitions, thresholds, and initial framework for categorizing transportation investments. The survey asked stakeholders to weigh-in on the definitions, thresholds, and approach for the analysis. The target audience for the survey were representatives from community-based organizations serving on Metro's various equity and public involvement committees as well as local partner staff represented on Metro's technical advisory committees. Invitations were sent to over 100 stakeholders. A total of 19 people participated in the survey. The survey was not intended for wide public engagement as the content asked for technical feedback to inform the methodology of the assessment.

The results of the technical survey determined which community of concern definitions and thresholds were used for the analysis. The following table illustrates the survey results and the selected definitions and thresholds.

Table 2-2: Technical Survey Results Summary

Definitions		
<i>Topic</i>	<i>Options</i>	<i>Final</i>
People of Color	Persons who identify as any of the following races: Black or African American, American Indian or Alaska Native, Asian, Native Hawaiian or other Pacific Islander, some other race or multiple races AND persons who identify ethnically as Hispanic or Latino in the 2010 U.S. decennial census.	Support with 56.3% of respondents
Limited English Proficiency	Persons who identify in the U.S. Census Bureau's American Community Survey as speaking English "less than very well."	Support with 68.8% of respondents
Older Adult	Persons who are 65 years of age or older as of the U.S. Census Bureau's 2010 census.	Support with 100% of respondents
Young Person	Persons who are 17 years of age or younger as of the U.S. Census Bureau's 2010 census.	Support with 87.5% of respondents
Low Income	Option 1: persons in a household living 200% of the federal poverty guidelines; or Option 2: persons in a household living 185% of the federal poverty guidelines; or Option 3: persons in a household living 150% of the federal poverty guidelines	Option 2 with 43.8% of respondents
Thresholds		
<i>Topic</i>	<i>Options</i>	<i>Final</i>
People of Color	Option 1: Census blocks where the total people of color population (by percent) is greater than the regional rate of people of color population (by percent). The regional rate is estimated at 33%; or Option 2: Census blocks where the total people of color population (by percent) is greater than one standard deviation of the regional rate of people of color population (by percent) For the Metro region, one standard deviation greater than the regional rate is estimated at 36%.	Option 1 with 60.0% of respondents
Limited English Proficiency	"Regardless of language, census tracts that have more than an 8.71% LEP population." The 8.71% represents the regional rate of over-5 years of age population who "do not speak English	Support with 43.8% of respondents

	very well" regardless of native language.	
Older Adult	Option 1: Census blocks where the total older adult population (by percent) is greater than the regional rate of older adult population (by percent). The regional rate is estimated at 10.2%; or Option 2: Census blocks where the total older adult population (by percent) is greater than one standard deviation of the regional rate of older adult population (by percent). For the Metro region one standard deviation greater than the regional rate is estimated at 10.3%.	Option 1 with 64.3% of respondents
Young Person	Option 1: Census blocks where the total young person population (by percent) is greater than the regional rate of young person population (by percent). The regional rate is estimated at 22%; or Option 2: Census blocks where the total young person population (by percent) is greater than one standard deviation of the regional rate of young person population (by percent). For the Metro region one standard deviation greater than the regional rate is estimated at 23%.	Option 1 with 66.7% of respondents
Low Income	Option 1: Census tracts where the total low-income population (by percent) is greater than the regional rate of low-income population; or Option 2: Census tracts where 20% or more of the population are below the poverty guideline as defined by question 9; or Option 3: Census tracts where the total low-income population (by percent) is one standard deviation greater than the regional rate of low-income population (by percent); or Option 4: Census tracts where the per capita income is lower than the one person poverty guideline from the U.S. Department of Health and Human Services Department. For reference, the one person poverty guideline for 2014 is \$11,670.	Option 1 with 57.1% of respondents

Scope of Transportation Investment, Unit of Analysis and Analysis Geography

With the definitions of the communities of concern and the thresholds for locating the communities of concern identified the scope of the transportation investments as well as the analysis geography need to be determined to map the communities of concern and begin the quantitative analysis. Because the 2014 RTP and 2015-2018 Environmental Justice and Title VI assessment are being conducted as part of the federal requirements for MPO, federal aspects were used as the primary guide for creating the scope of the transportation investments for the quantitative analysis.

Transportation Investments

Because the 2014 RTP and 2015-2018 Environmental Justice and Title VI assessment is using an investment analysis to identify quantifiable disproportionate and/or disparate investment, understanding which transportation investments to assess was a key part of framing the analysis. Based on federal requirements, both the 2014 RTP and 2015-2018 MTIP must be financially constrained, meaning the region does not expend more than what the region projects to receive. As a result, the transportation projects identified in the financially constrained 2014 RTP and the entire 2015-2018 MTIP were included in the analysis. Table 2-3 provides further detail in regards to the scope and assumptions made the transportation investments.

Table 2-3. Scope of Transportation Investments Assessed and Assumptions

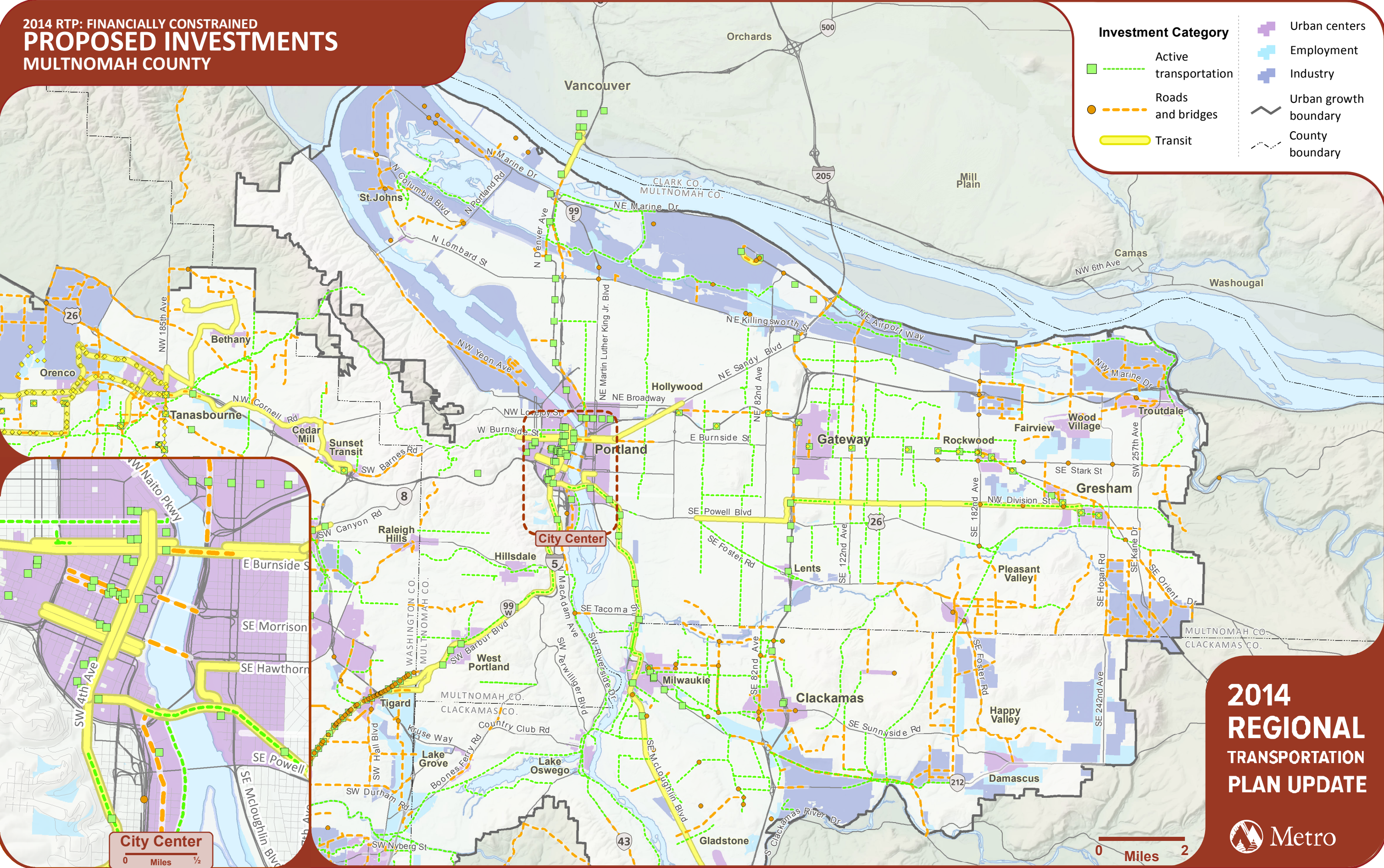
Policy Document	Scope and Assumptions for Transportation Investment
2014 RTP Transportation Investments	• Reflects the transportation projects locals submitted as part of the 2014 RTP update as of January 2014. Since January 2014, some projects have shifted and based on the outcomes of the public comment period, so projects may be removed or included. • Per federal requirements the RTP must be financially constrained, therefore the projects on the financially constrained list were evaluated in the assessment. • Certain transportation investments were partially assessed in the analysis due to the unknown location of the transportation investment and therefore the investment could not be compared to the location of communities of concern. These projects with unknown spatial information were used in determining total regional transportation investments, but were excluded in the aggregate investments in communities of concern. An example project is “city-wide sidewalk infill project.”
2015-2018 MTIP Transportation Investments	• Projects identified and programmed for federal fiscal years 2015-2018 as of March 2014 were included. • Only the total federal and state contribution was evaluated in the analysis. • Certain transportation investments were partially assessed in the analysis due to the unknown location of the transportation investment and therefore the investment could not be compared to the location of communities of concern. These projects with unknown spatial information were used in determining total regional transportation investments, but were excluded in the aggregate investments in communities of concern. An example project is “city-wide sidewalk infill project.”

The partially assessed projects were included the analysis of total regional transportation investments, because the spatially specific information was not needed (since all the projects are in the region). However, the projects without spatially specific information, these could not be included in the analysis of investments in communities of concern.

Figures 2.1 – 2.4 illustrate the spatial investments assessed for the 2014 RTP and the 2015-2018 MTIP. The specific Project details can be found in the appendices.

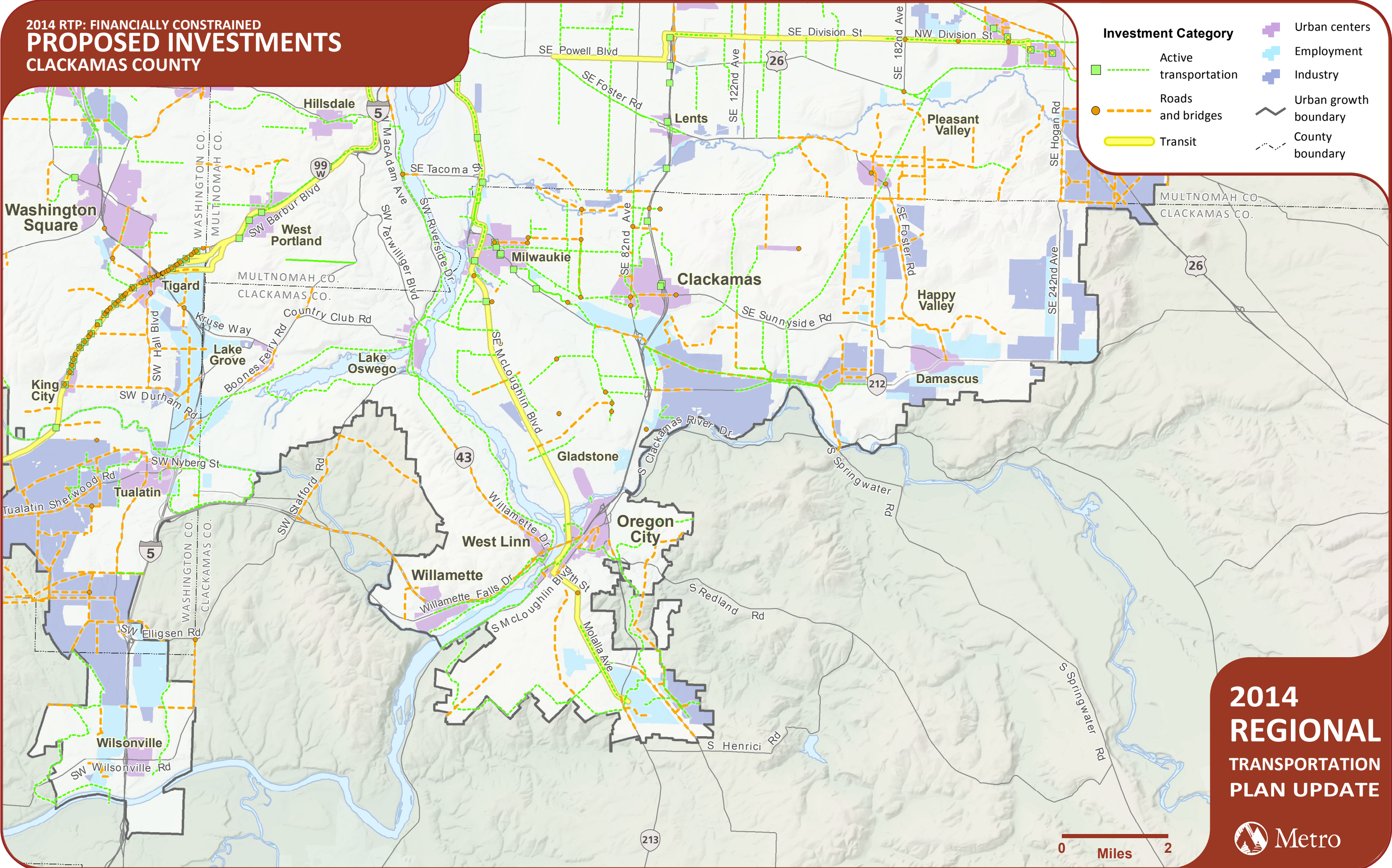
Figure 2.1

Figures 2.1 – 2.4 illustrate the spatial investments assessed for the 2014 RTP and the 2015-2018 MTIP. The specific project details can be found in the appendices.



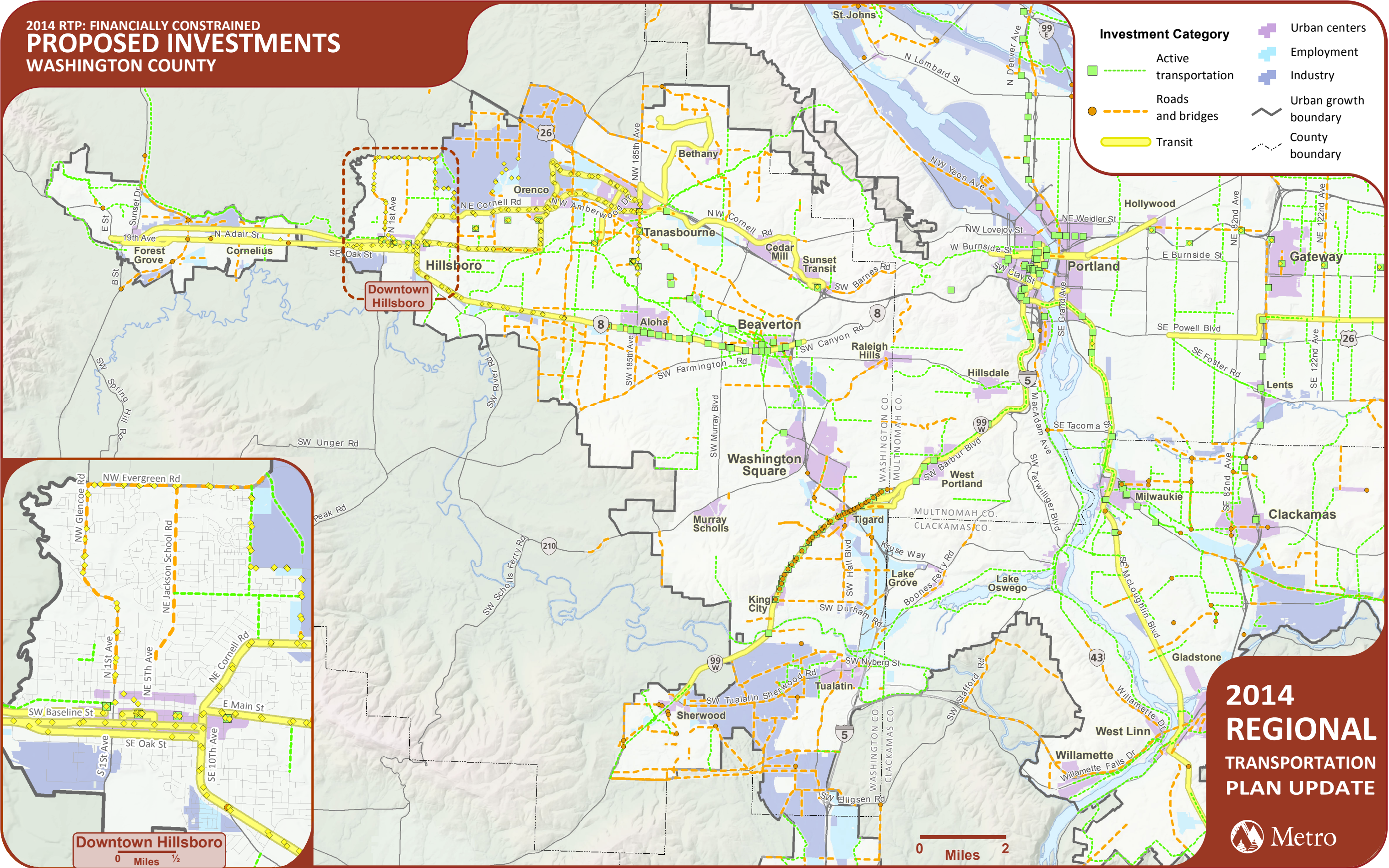
Transportation investments shown are those which have an identified spatial element provided by the local nominating agency. Programmatic projects including regional programs are not shown. Transportation investments represented on this map indicates projects identified for the 2014 RTP as of January 2014. Map saved 5/13/2014 at M:\plan\drc\projects\14022_EJ_TitleVI_2014\D_MXD\NEW_MXD\RTP_MultnomahCo.mxd

Figure 2.2



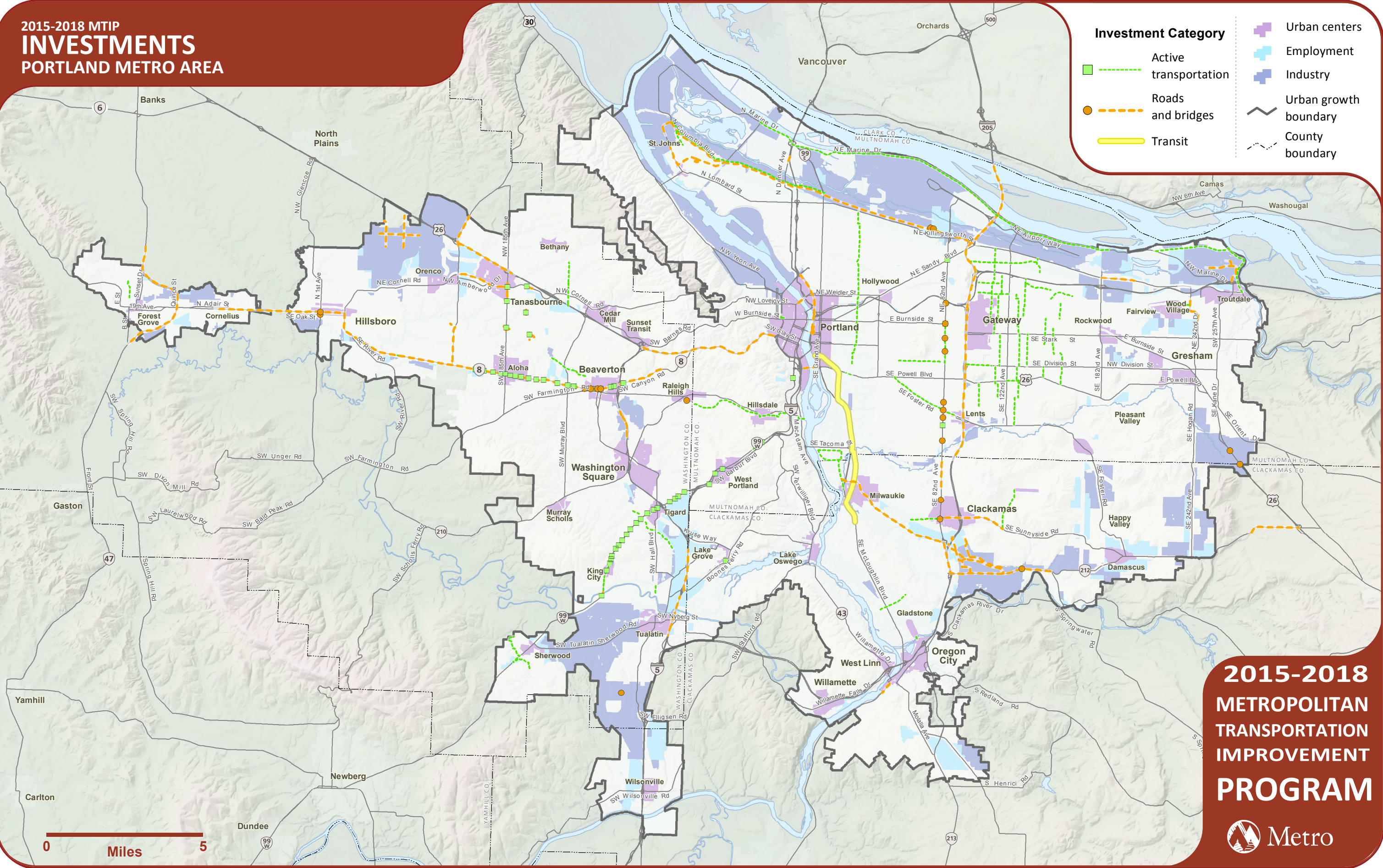
Transportation investments shown are those which have an identified spatial element provided by the local nominating agency. Programmatic projects including regional programs are not shown. Transportation investments represented on this map indicates projects identified for the 2014 RTP as of January 2014. Map saved 5/12/2014 at M:\plan\drc\projects\14022_EJ_TitleVI_2014\NEW_MXD\NEW_MXD\RTP_ClackamasCo.mxd
2014 RTP and 2015-2018 MTIP Environmental Justice and Title VI Report

Figure 2.3



Transportation investments shown are those which have an identified spatial element provided by the local nominating agency. Programmatic projects including regional programs are not shown. Transportation investments represented on this map indicates projects identified for the 2014 RTP as of January 2014. Map saved 5/13/2014 at M:\plan\drp\projects\14022_EJ_TitleVI_2014\D_MXD\NEW_MXD\RTP_WashingtonCo.mxd

Figure 2.4



Transportation investments shown are those which have an identified spatial element provided by the local nominating agency. Programmatic projects including regional programs are not shown. Some projects have been generalized for cartographic and analytical purposes. Map saved 5/13/2014 at M:\plan\src\projects\14022_EJ_TitleVI_2014\D_MXD\NEW_MXD\MTIP.mxd
2014 RTP and 2015-2018 MTIP Environmental Justice and Title VI Report

Datasets and Analysis Geography

As the federally designated MPO, Metro is responsible for regional assessment of the transportation system. The federal parameter means the analysis geography must be regional in scale. In order to report the 2014 RTP and 2015-2018 MTIP Environmental Justice and Title VI quantitative analysis at a regional scale, a number of different datasets, with its own unique geographies must be manipulated to create a consistent regional geography to report results. The input data for the quantitative analysis requires the use of demographic spatial datasets from the U.S. Census Bureau. Table 2-4 identifies the datasets and the unique geographies associated with the datasets.

Table 2-4. U.S. Census Geographies and Corresponding Datasets

U.S. Census Bureau Geography	Dataset of Interest
Census Blocks	People of Color, Age
Census Tracts	Limited English Proficiency, Low-Income

For the purposes of the analysis, a regional boundary needed to be defined in order to manipulate the demographic datasets from the U.S. Census. Unique state and federal planning rules provided a several potential regional geography definitions to frame the assessment. In review of the RTP and MTIP policy frameworks, the urban growth boundary (UGB), a designation under Oregon state planning rules, was selected for the purpose of conducting the assessment. The reason the state designated urban growth boundary was selected rather than the federal MPO planning boundary, is in part the nature of the Portland metropolitan planning policies emphasizing compact growth in within the UGB.

With the UGB identified as the regional geography, the census blocks and the census tracts were traced to the UGB. While the census tracts and census blocks borders do not correspond directly with the UGB, a conservative approach of intersecting the census geographies with the UGB was used to ensure the region's entire population was included in the analysis. Table 2-5 provides further detail in regards to the analysis geography and assumptions.

Table 2-5. Analysis Geography Assumptions

Geography	Assumptions
Regional Geography	• The region's geography is the urban growth boundary (UGB) as of March 2014. The assessment takes into account areas in Multnomah, Clackamas, and Washington Counties which are inside the UGB. • The analysis geography does not take into account rural or urban reserves.
Census Blocks	• Census blocks and tracts are used as the primary geographies to determine population counts or estimates and the acreage. • Census blocks were intersected to the urban growth boundary. All census blocks (and subsequent data within the block) which intersected with the urban growth boundary were included. • Census blocks were nested into Census Tracts for population and area consistency.
Census Tracts	• Census blocks and tracts were intersected to the urban growth boundary. All tracts (and subsequent data within the tract) which intersected with the urban growth boundary were included.

Datasets and Geography Limitations

Working with different datasets and defining a regional geography presents a number of different limitations. Three significant limitations to note include:

- 1) Mismatching spatial datasets and the regional geography can over or undercount the regional populations;
- 2) The exact locations of individual persons cannot be identified within the spatial datasets; and
- 3) Demographic spatial datasets come from two different sources.

In order to create the regional analysis geography, the census blocks and census tracts were intersected to the UGB. This means any census block or census tract which was: 1) entirely within; 2) crosses; and 3) touched the UGB were included in the regional geography. This means the population information census tracts and census blocks which only have a small segment within the UGB were included. A risk of using the approach of including all the intersecting census blocks and tracts is the analysis population total will be larger than the actual total population of the region.

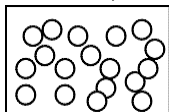
Another difficulty in working with census demographic datasets is determining the individual locations of communities of concern. The U.S. Census Bureau's decennial census and American Community Survey provide a wealth of demographic data, but identifying exact locations of populations within the census geography is not possible for privacy purposes. However, because the U.S. Census Bureau's decennial census and American Community Survey are often the most complete and available datasets for a given area, it was selected as the main dataset to extract demographic information. While other data sources may be able to pinpoint the location with greater precision, the availability of that data for an entire region is often more challenging to find.

Lastly the third limitation to highlight is the difference in population inputs for young persons, older adults, and people of color compared to limited English proficiency and low-income. The population inputs for young persons, older adults, and people of color from the 2010 decennial census, which is a population count. The count represents the actual number of persons as of April 2010. The population input for limited English proficiency and low-income populations are from the American Community Survey (ACS) 2008-2012 dataset. The ACS is an estimate based on statically valid sampling of the population over five years. For the two population inputs of interest (limited English proficiency and low-income) to be statistically valid for the analysis, the census tract geography had to be used. In order to prevent creating two analysis geographies, one from census blocks and another with census tracts, the census blocks and census tracts were nested, meaning the all the census blocks which fit within the census tracts were included in the analysis geography. This created an analysis geography which would allow for consistent comparisons between the different communities of concern and with the regional totals.

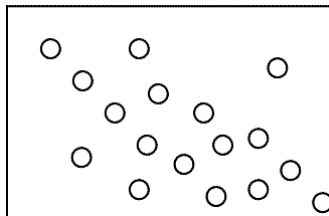
Unit of Analysis

Since the quantitative element of the 2014 RTP and 2015-2018 Environmental Justice and Title VI assessment looks at disproportionality of where transportation investments are being made relative to the locations of communities of concern, a regional benchmark measure was needed to determine disproportionality. Based on discussions, the initial benchmark identified was transportation investment per person as a means of determining disproportionate investment. However, recognizing population density can greatly skew the results, the benchmark was refined to consider transportation per person per acre. The following illustrations provide an explanation of the benchmark.

In each area, \$100 of transportation investment was made.



100 people
1 acre
 $\$100 \text{ investment} / 100 \text{ people} = \1 per person
 $\$1 \text{ per person} / 1 \text{ acre} = \$1 \text{ per person per acre}$



100 people
10 acres
 $\$100 \text{ investment} / 100 \text{ people} = \1 per person
 $\$1 \text{ per person} / 10 \text{ acres} = \$0.10 \text{ per person per acre}$

Process 2 – Quantitative Analysis of Long and Short Term Transportation Investments

The environmental justice and Title VI assessment of the 2014 RTP and the 2015-2018 MTIP takes a hybrid quantitative and qualitative approach to evaluate the potential benefits and burdens of regional transportation investments. The quantitative methodology is intended help identify disproportions of investments in communities of concern compared to investments in the non-communities of concern, while the qualitative method helps establish whether there is a programmatic disproportionate burden on communities of concern.

A distinct difference of the assessment is that the analysis is made on a regional programmatic scale. This means investments are looked at in aggregate and through the lens of different investment categories. The approach differs from a project specific evaluation, which is conducted during the planning and project development phases of a project. Per federal regulations, environmental justice and Title VI considerations are made by the project sponsor at the individual project-level throughout the phases of a project (e.g. planning, project development, construction) and also at a programmatic level where projects are looked at in bundles by the MPO.

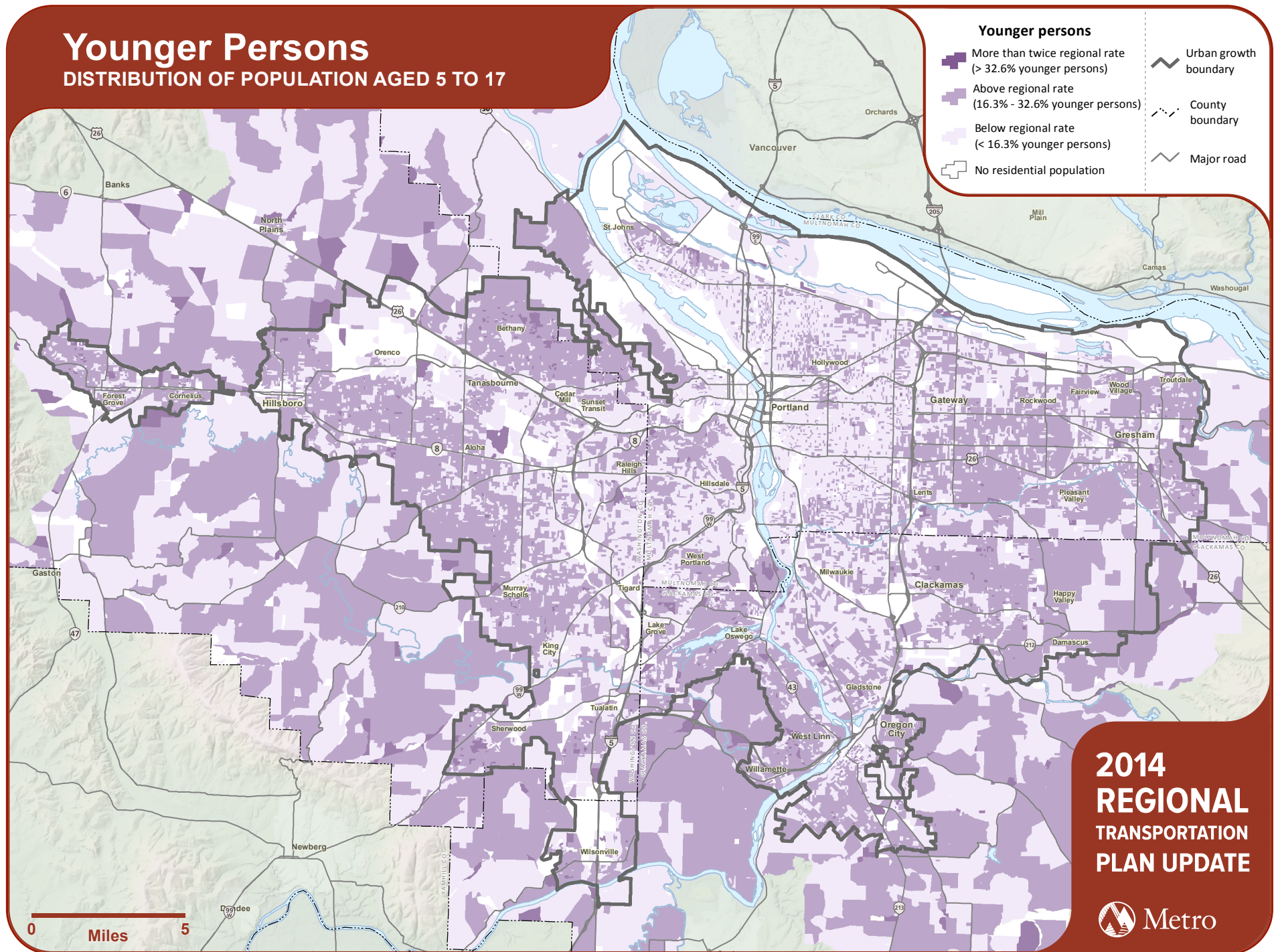
Defining the Areas of Communities of Concern

For the purposes of the quantitative analysis each of the community of concern (young persons, older adults, people of color, limited English proficiency, and low-income) are evaluated individually instead of in aggregate or through a composite. The reason each community of concern is evaluated individually is because of the limited ability to distinguish in the U.S. Census Bureau's Decennial Census or American Community Survey datasets whether an individual may identify in one or more of the communities of concern.

The quantitative analysis makes two distinctions for each community of concern. These are: 1) whether there is a presence of an individual community of concern in the correlating census geography; and 2) whether there is a concentration, as defined by the previously established thresholds, of an individual community of concern. The two distinctions help to see the difference in transportation investment levels for the entire community of concern and in concentration areas. For both, the entire community of concern and the community of concern in concentrated areas, the population is looked at in aggregate. This means for the community of concern in concentrated areas, the population is evaluated in aggregate rather than evaluating each individual area with a concentration.

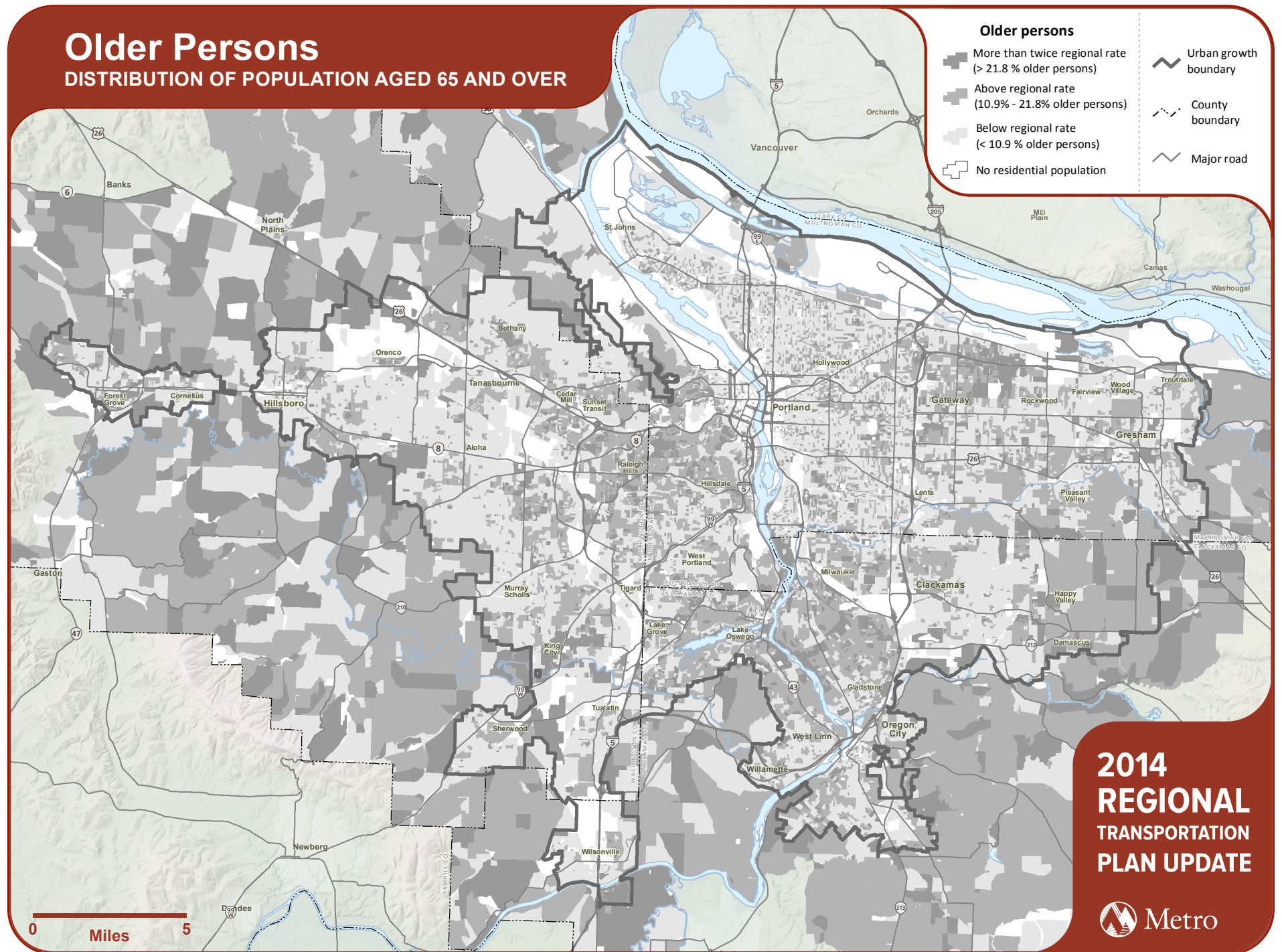
The demographic maps in figures 2.5- 2.9 illustrate the areas where an individual community of concern is concentrated.

Figure 2.5



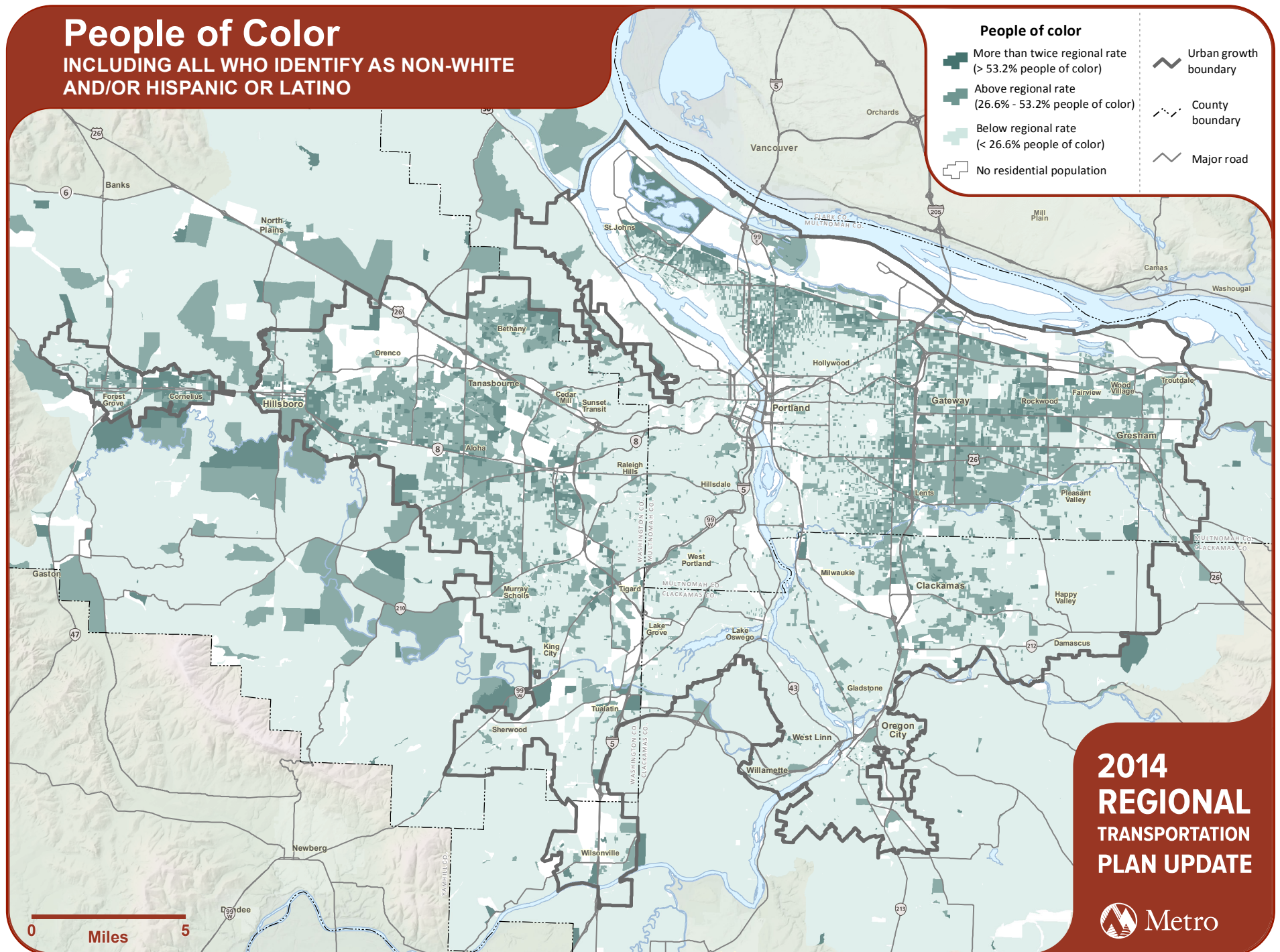
Data source: U.S. Census Bureau, 2010 Census Summary File 1, Table P12 (census block scale). Transportation investments shown are those which have an identified spatial element provided by the local nominating agency. Programmatic projects including regional programs are not shown. Map saved 5/13/2014 at M:\plan\drp\projects\14022_EJ_TitleVI_2014ID_MXD\NEW_MXD\YoungerPersons.mxd

Figure 2.6



Data sources: U.S. Census Bureau, 2010 Census Summary File 1, Table P12 (census block scale). Transportation investments shown are those which have an identified spatial element provided by the local nominating agency. Programmatic projects including regional programs are not shown. Map saved 5/13/2014 at M:\plan\drp\projects\14022_EJ_TitleVI_2014ID_MXD\NEW_MXD\OlderPersons1.mxd

Figure 2.7



Source: U.S. Census Bureau, 2010 Census Summary File 1, Table PA001 (census block scale). Transportation investments shown are those which have an identified spatial element provided by the local nominating agency. Programmatic projects including regional programs are not shown. Map saved 5/13/2014 at M:\plan\proj\14022_EJ_TitleVI_2014ID_MXD\NEW_MXD\PeopleOfColor.mxd

Figure 2.8

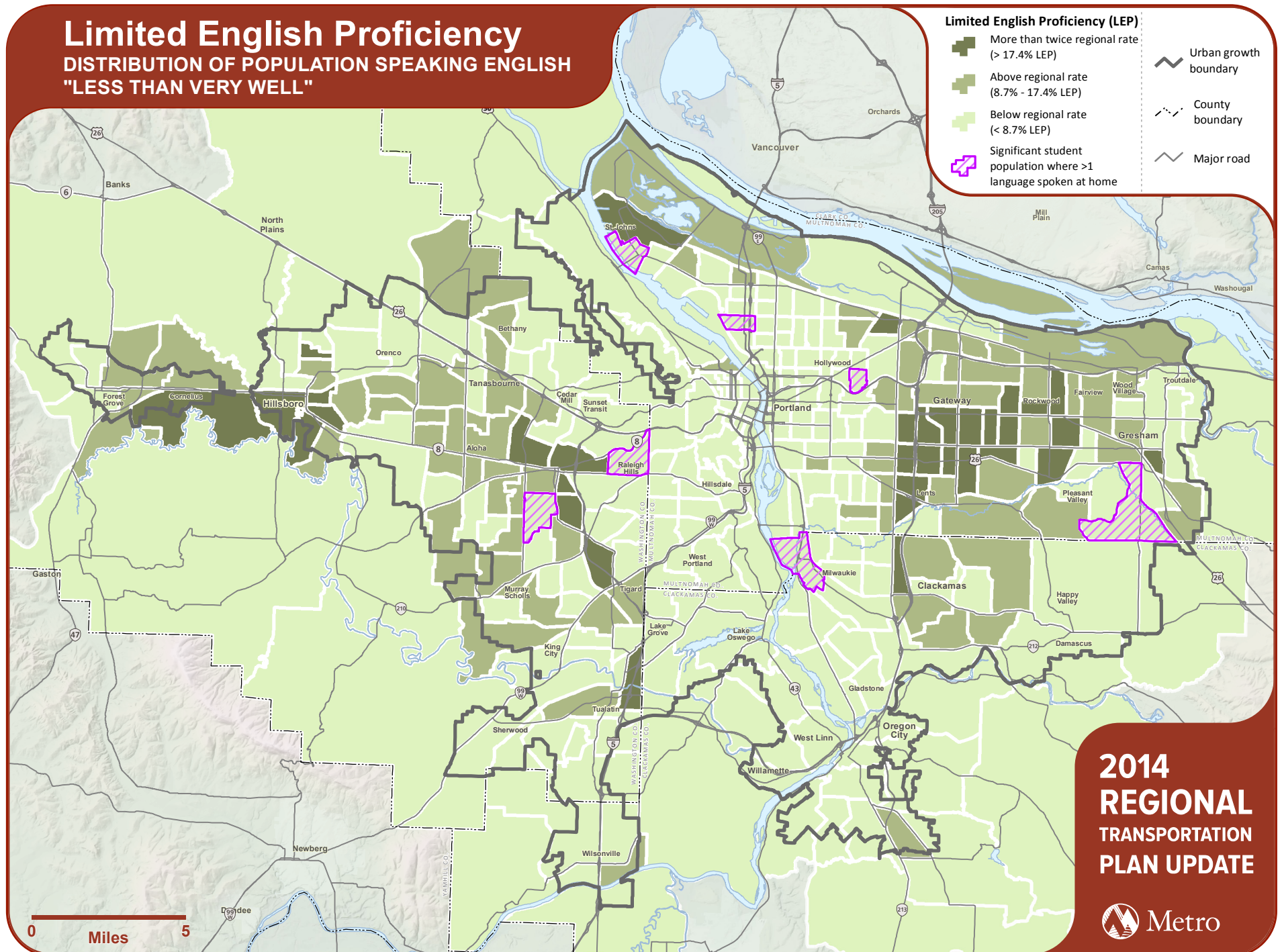
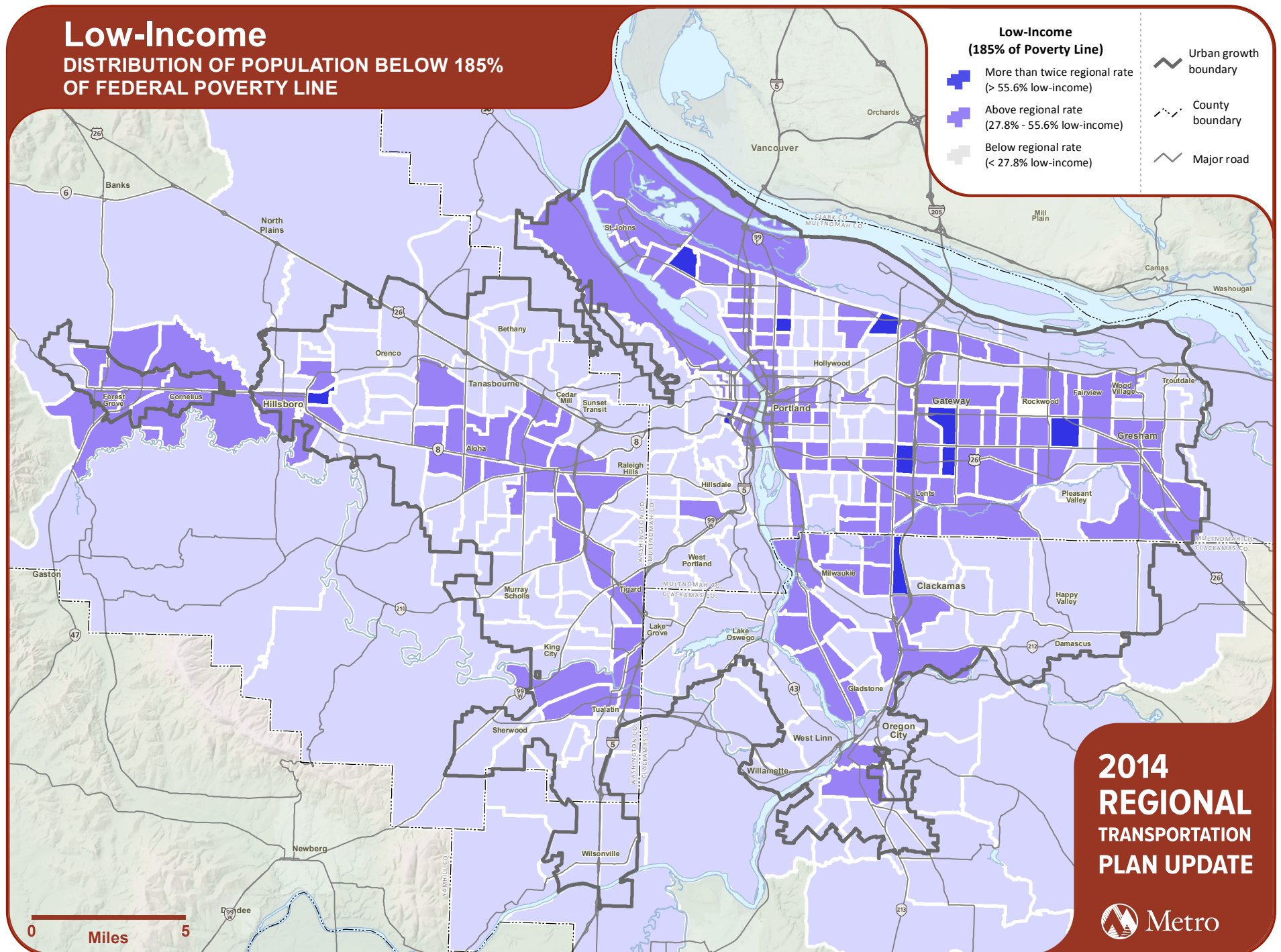


Figure 2.9



Data source: U.S. Census Bureau, 2008-2012 American Community Survey, Table S1701 (census tract scale). Transportation investments shown are those which have an identified spatial element provided by the local nominating agency. Programmatic projects including regional programs are not shown.
 Map scale: 1 inch = 5 miles. Map data: 2014 RTP and 2015-2048 MTP Environmental Justice and Title VI Report

Breakdown of the Region's Transportation Investments

Feedback received through the technical survey highlighted transportation investments can vary on the positive and negative impacts and outcomes they have on a community of concern based on the transportation investment type. Therefore, the quantitative analysis also compares transportation investments by type for the region and for communities of concern. The transportation investment categorization framework is identified in Table 2-6.

Table 2-6. Transportation Investment Category Assumptions

Transportation Investment Category	Assumptions
Regional	Includes all transportation investments, even programmatic (non-spatially specific) investments
Active Transportation	Includes bicycle, pedestrian, and regional trail investments. Also includes transportation demand management projects. Some roadway projects which have bicycle and pedestrian elements (as required by state law) were not included in this category.
Roads and Bridges	Includes roadway, throughways, freight, intelligent transportation systems/transportation system management and operations.
Public Transit	Includes transit and transit-oriented development projects

The transportation investment framework presents a number of limitations. By grouping transportation investments under three main categories, some of the nuance and distinction of an individual transportation investment is lost. As part of the technical survey, participants were asked to weigh in on the transportation investment framework. Feedback was received on the framework requesting the analysis and requested the investments be subcategorized or further divided. Additionally, some comments received also feared the framework perpetuated a mentality of mode versus mode. While the feedback was considered, Metro staff elected to continue with the simplified transportation investment framework because the 2014 RTP and 2015-2018 MTIP Environmental Justice and Title VI assessment is a programmatic analysis. The programmatic element of the analysis does not lend strongly to looking at the individual aspects of transportation investments. However, regardless of the programmatic results, transportation projects are expected to undergo individual environmental and project analysis during project development to determine the potential positive and negative impacts in compliance with Title VI and the Executive Order on Environmental Justice.

Assigning the Region's Transportation Investment to Communities of Concern

In order to conduct the quantitative analysis, transportation investments needed to be assigned to the individual communities of concern. Mapping transportation investments was conducted in order to assign the investments. The methodology for assigning of transportation investments took a conservative approach and utilized an intersect rule. The intersect rule means any transportation project which intersected a census tract or census block was assigned the value (e.g. cost) of the transportation project if: 1) there was the presence of one or more individuals of a community of concern when assessing investments levels for the total population of a community of concern; or 2) there was a high concentration of an individual community of concern (as defined by the thresholds) when assessing investment levels in areas where a community of concern's population is concentrated. As an example, a transportation project which touches the edge or crosses through the entire census geography has the full investment assigned. These transportation investments were then totaled to establish at a regional scale the amount of investment going towards each individual community of concern. The assignment of investments to individual communities of concern results in a package of investments will differ for each community of concern based on the location of the community. For example, if a regional trail investment crosses into census geography which people of color and young persons are present, then the regional trail investment is assigned to each community. The mix of transportation investments will draw from the same pool of investments, but the overall investment level will be different between the five communities of concern.

The geospatial information and the intersect approach presents a number of limitation and challenges to the analysis. As noted previously in the scope of the transportation investments section, the transportation projects which have clear spatial information (e.g., bike lane on North Allegheny from Seneca Street to Central Street) are able to be assigned to a community of concern. For those transportation investments which are programmatic in nature, (e.g., sidewalk infill in Gresham) these investments could not be assigned to individual communities of concern because the exact location could not be determined. This means programmatic investments may ultimately be made in a community of concern that may be undercounted.

Also using an intersect approach has a number of limitations. As previously discussed with the regional analysis geography, it is not possible to locate the exact location of the community of concern when using census data. Therefore, a transportation investment which touches the edge or crosses through the geography of a community of concern can have very different effects based on location of the community of concern within the census geography.

Additionally, the intersect approach cannot determine the degree of effect the investment has on the people located in the census geography. As a result, a key factor in the quantitative analysis is not to use the results to determine positive or negative impact, but rather have a qualitative discussion focused on areas of disproportionality of investments to determine any programmatic benefits and burdens.

Establishing the Regional Benchmark for Comparison

The regional benchmark of transportation investments is being used as the main quantitative indicator of disproportionality in transportation investments between a community of concern and the remaining population. To establish the regional benchmark of transportation investments, the total of the region's transportation investments, including those which are programmatic in nature, are looked at relative to the region's total population to gain an investment per capita value. Mathematically, this is:

$$\text{Total regional transportation investments (RTP or MTIP)} / \text{Total population} = \text{Regional transportation investment per capita}$$

However, alluded to previously, when evaluating areas with high concentrations of population, density can greatly skew or mask the level of transportation investment per capita. For example, a \$100 investment made in downtown Portland would be spread out across the population differently than a \$100 investment made in Canby. Therefore, to make comparisons, the additional metric of area was included as part of the quantitative analysis to adjust for population density. For the regional benchmark of transportation investments, the mathematical equation looks like:

$$(\text{Total regional transportation investments (RTP or MTIP)} / \text{Total population}) / \text{Area in Acres} = \text{Regional transportation investment per capita per acre}$$

The result is a regional transportation investment per person per acre is illustrated in Table 2-7. The transportation investments for individual communities of concern, using the same per person per acre unit, will be compared to the regional benchmark.

Table 2-7. Regional Transportation Investment Benchmarks (per person per acre)

Policy/Plan Document	Transportation Investment
Long-Term (2014 RTP)	\$.014 per person per acre
Short-Term (2015-2018 MTIP)	\$.0008 per person per acre

Comparing the Region's Transportation Investment in Communities of Concern

For each community of concern (young persons, older adults, people of color, limited English proficiency, and low-income) the total regional investments (per person per acre) were calculated for two different factors: 1) transportation investments in an entire community of concern and 2) transportation investments in areas with a high concentration of a community of concern. These two factors were developed to understand the

difference in transportation investment in areas where communities of concern are concentrated compared to any location where a member of an individual community of concern is located within the region. The regional benchmark is used as the comparison to determine disproportions in regional transportation investments.

To determine the transportation investment for the entire community of concern, transportation investments were assigned to a community of concern (i.e., young persons, older adults, people of color, limited English proficiency, and low-income) if the investment crossed into any area where the community of concern was present. In general, this meant more transportation investments were assigned to a community of concern because even having one person who identifies as one of the five communities made the entire census geography eligible for intersecting transportation investments. Only those census geographies which did not have a single member of one of the five identified communities of concern were excluded. In most cases, the census geographies which were excluded were those which were predominately natural areas, such as forest park, which has little to no population. The intention for assessing the transportation investments for the entire community of concern was inclusivity. The approach accounts for all people who would identify in the community of concern, regardless of location in the Portland metropolitan region. The transportation investment per person per acre was assessed for each of the five communities of concern. Table 2-8 illustrates an example of the outputs.

Table 2-8. Example of Regional Transportation Investments Comparison Table – Entire Population of Community of Concern

Regionwide Comparisons						
	Regional Total Investment	Regional Young Persons Total Investment	Regional Older Person Total Investment	Regional People of Color Total Investment	Regional Limited English Proficiency Total Investment	Regional Low Income Total Investment
2014 RTP						
2015-2018 MTIP						

While understanding the transportation investments for the entirety of each community of concern helps place in context the disproportionality of investments, it is also important to understand the transportation investments which intersect with a high proportion of each community of concern. Looking at areas where there is a high population density of a community of concern illustrates whether areas with concentrated communities of concern receive the same investment as the region once accounting for population density. For determining the transportation investments in areas of high concentrations of communities of concern, the established thresholds from the technical survey were used to identify where in the region there is a concentration of an individual community of concern. These are illustrated in Figures 2.5 – 2.9, demographic maps. The transportation investments which intersect with the identified census geographies to have a high concentration of a community of concern are assigned the transportation investment. Table 2-9 also shows an example of the outputs.

A key difference in calculating the investments in concentrated areas of communities of concern is the entire population in the census geographies identified as having a high concentration of a community of concern becomes accounted. As previously noted, because the census geography cannot identify the specific location of certain individuals, the entire population in the census geography for the concentrated area was accounted for in the analysis because all people within the census geography experience the transportation investment. This differs from the method in calculating the transportation investments for an entire community of

concern because the entire community calculation is taking a comparison of transportation investments of the region-wide population relative to the whole of specific community of concern in the region.

Table 2-9. Example of Regional Transportation Investments Comparison Table – Concentrated Communities of Concern

Regionwide compared to Environmental Justice Communities in Concentration						
	Regional Total Investment	Total Community Investment in Areas of Concentrated Young Persons	Total Community Investment in Areas of Concentrated Older Persons	Total Community Investment in Areas of Concentrated People of Color	Total Community Investment in Areas of Limited English Proficiency Persons	Total Community Investment in Areas of Low Income Persons
2014 RTP						
2015 - 2018 MTIP						

In addition to comparing the regional transportation investment relative to communities of concern, the assessment also makes comparisons by transportation investment categories. Each regional transportation investment was assigned to one of three investment categories: active transportation, roads and bridges, and public transit. Similar to the regional transportation investment total, the category investment per person per acre was calculated for the region and then for each community of concern. For the purposes of making the categorical comparisons, the investment was calculated for the entire population of the community of concern. Table 2-10 illustrates an example of the outputs.

Table 2-10. Example of Regional Transportation Investments Comparison Table – Concentrated Communities of Concern

2014 Regional Transportation Plan						
	Regional Total Investment	Young Person Total Investment	Older Person Total Investment	People of Color Total Investment	Limited English Proficiency Person Total Investment	Low Income Person Total Investment
Active Transportation						
Roads and Bridges						
Public Transit						
2015-2018 Metropolitan Transportation Improvement Program						

	Regional Total Investment	Young Person Total Investment	Older Person Total Investment	People of Color Total Investment	Limited English Proficiency Person Total Investment	Low Income Person Total Investment
Active Transportation						
Roads and Bridges						
Public Transit						

In developing the numerous comparisons of regional transportation investments relative to the transportation investments being made in communities of concern, the analysis looks at whether there are disproportionate investments between the region and communities of concern through the different lenses.

The results of the quantitative analysis do not to presume whether a disproportionate or disparate investment means a disproportionate burden or disparate impact is present. The intention of the quantitative analysis is to illustrate whether there is a quantifiable disproportion present to frame a qualitative discussion of benefits, burdens, and impact on communities of concern.

Evaluating Disparate Impact

The final component to fulfilling the 2014 RTP and 2015-2018 MTIP Environmental Justice and Title VI assessment is evaluating the presence of a disparate impact with the region's public transit investments in the long and short-term. The disparate investment analysis compares the region's total transportation investments to the total transportation investments for an entire community of concern. The premise of disparate investment is to determine whether there is an unintentional inequity or unfairness in the distribution of public transportation investments between different communities and the region's population.

As directed by Federal Transit Administration Guidance on Title VI of the Civil Rights Act, the disparate investment analysis evaluates public transit investments emerging from federal and state fund sources. As a result, the majority of the public transit investments assessed are capital public transit investments, which predominately come from state and federal sources. Capital public transit investments vary to include purchasing of replacement bus fleet or building a new rail line. Operating funds for transit service come from local sources and therefore are not part of the assessment. Local transit operators undertake a separate, but detailed environmental justice and Title VI analysis for proposed transit service and fare changes.

Unlike the disproportionate burden analysis, the disparate impact analysis will draw a conclusion from the quantitative analysis.⁷ The reason for the disparate impact analysis will make a formal conclusion is because, unlike the disproportionate investment analysis, the disparate impact analysis is a specific form of assessment which has been established through case law. As a result, the proportion of transportation investment per person per acre for communities of concern compared to the region will quantitatively indicate disparate impact.

⁷ Metro had planned to use the four-fifths (4/5th) rule to make a determination on the existence of disparate investments. Under the four-fifths rule, the total transportation investments of the region are compared to those of an entire community of concern. If the investment in the community of concern is four-fifths or 80% of that of the region or higher than further analysis to assess a disparate impact is most likely unnecessary. If the investment in the community of concern is less than four-fifths or below 80%, that would trigger a finding of disparate impact in that community of concern as the benefits of investment are being provided to the community of concern at a rate less than 80% than the benefits being provided to the region as a whole.

The four-fifths rule is a standard that was originally developed in employment discrimination practices for determining disparities and has been put forth as the potential measure in similar assessments by other metropolitan planning organizations. However, equity advocates strongly object to using the standard in the Title VI assessment context, as demonstrated in the comments received. Since comparative investment rates for each community of concern for both the 2014 RTP and the 2014-18 MTIP are higher than the regional rate, Metro staff makes the determination that the quantitative analysis reveals no disparate impact without relying on or implied endorsement the four-fifths rule and recommends additional refinement of assessment methodology to determine the proper comparative metrics for future assessments.

Table 2-11. Example of Disparate Investment Analysis Outputs

Public Transit Investments – Regionwide Investments in Entire Community of Concern											
	Region	Young Person	DIA Ratio	Older Person	DIA Ratio	People of Color	DIA Ratio	Limited English Proficiency Person	DIA Ratio	Low Income Person	DIA Ratio
2014 RTP											
2015-2018 MTIP											

Process 3 – Qualitative Assessment of Short and Long-Term Transportation Investments

The purpose of the qualitative assessment is to assess the feedback received through stakeholder engagement and public comment to determine whether the region's long and short-term investments create a programmatic disproportionate burden on communities of concern. The qualitative assessment is to recognize and to reflect feedback received that whether a transportation investment is perceived as a benefit or a burden depends greatly on the context of the individual or community. Therefore, while the quantitative analysis can provide a mathematical basis for understanding whether there are disproportionate investments between communities of concern and the region, the qualitative assessment will indicate whether programmatic disproportionate investments (over or under investment) cause an overall burden or benefit.

The qualitative methodology takes the approach of identifying and categorizing the feedback received to create an overarching set of key themes and identified programmatic burdens or benefits the communities of concern would experience through the investments. Based on the key themes and identified burdens or benefits, Metro will consider how adjustments to regional policies and programs can address disproportionate programmatic burdens.

To help gather the feedback on programmatic burdens, a matrix of potential benefits and burdens from transportation investments was developed to direct responses. As seen in Table 2-12, the matrix illustrates the different potential impacts, effects, and outcomes to emerge from a transportation investment. Feedback is being asked as to which potential outcomes would be experienced by communities of concern in the region based on the quantitative analysis of the long and short-term transportation investment packages.

Table 2-12. Potential Benefits and Burdens from Transportation Investments

Potential impacts	Potential effects	Potential outcomes (benefits and burdens analysis component)
Change in access to employment, services or social/community assets	Transportation investment could increase access to employment, essential services or community assets	Increased opportunities for employment, access to services and/or cohesiveness of the community
	Transportation investment could present a new or increased barrier to accessing employment, essential services or community assets	Decreased opportunities for employment, access to services and/or cohesiveness of the community
Change in property values	Transportation investment could increase property values in the vicinity of the	Increased wealth for property owner community members

	projects.	Increased opportunities to finance new housing and retail options in the community
		Increased housing costs and displacement for renters
		Accelerated rate of change in built environment and community demographics that impact community identity and cohesiveness (gentrification).
	Transportation investment could decrease property values in the vicinity of the projects.	Decrease in wealth of property owners. Disinvestment in community assets and economic opportunity. Increased concentration of poverty.
Exposure to environmental impacts (emissions, noise, and visual impacts)	Transportation investment could increase exposure to negative environmental impacts or decrease positive environmental impacts in the vicinity of the projects.	
		Health impacts and costs associated with exposure to emissions, decreased activity and stress.
	Transportation investment could decrease exposure to negative environmental impacts or increase positive environmental impacts in the vicinity of the project.	Improved health and lower costs associated with less exposure to negative environmental impacts.
Safety and security	Transportation investment could increase exposure to safety and security issues in the vicinity of the projects.	Potential increase in crash and fatality rates. Potential increase in criminal activity
	Transportation investment could decrease exposure to safety and security issues in the vicinity of the projects.	Potential decrease in crash and fatality rates. Potential decrease in criminal activity.

Data for the qualitative analysis will be gathered through two main formats: an online survey and small group discussions with communities of concern. The data collection will take place during a formal public comment period from May 16 through June 20, 2014. In both the online survey and the small group discussions, participants will be asked the following questions:

- What are the potential benefits and burdens on communities of concern from investments in roads, transit, and active transportation?
- Are there things we can do on a regional level (through policies or programs) to address, mitigate, and/or prevent the potential burdens from road, transit, and active transportation investments on communities of concern?

Findings of any programmatic disproportionate burdens will be made from the feedback received and subsequent recommendations will be developed as part of the final report.

A reminder the 2014 RTP and 2015-2018 MTIP Environmental Justice and Title VI assessment looks to determine disproportionate burdens and/or disparate impact at a programmatic scale. This means burdens or disparate impacts are assessed collectively and not at an individual transportation project scale.

Chapter 3: 2014 Regional Transportation Plan Quantitative Analysis Results

This chapter provides an overview of the quantitative analysis results and initial findings for the 2014 Regional Transportation Plan (RTP).

Quantitative Analysis Background

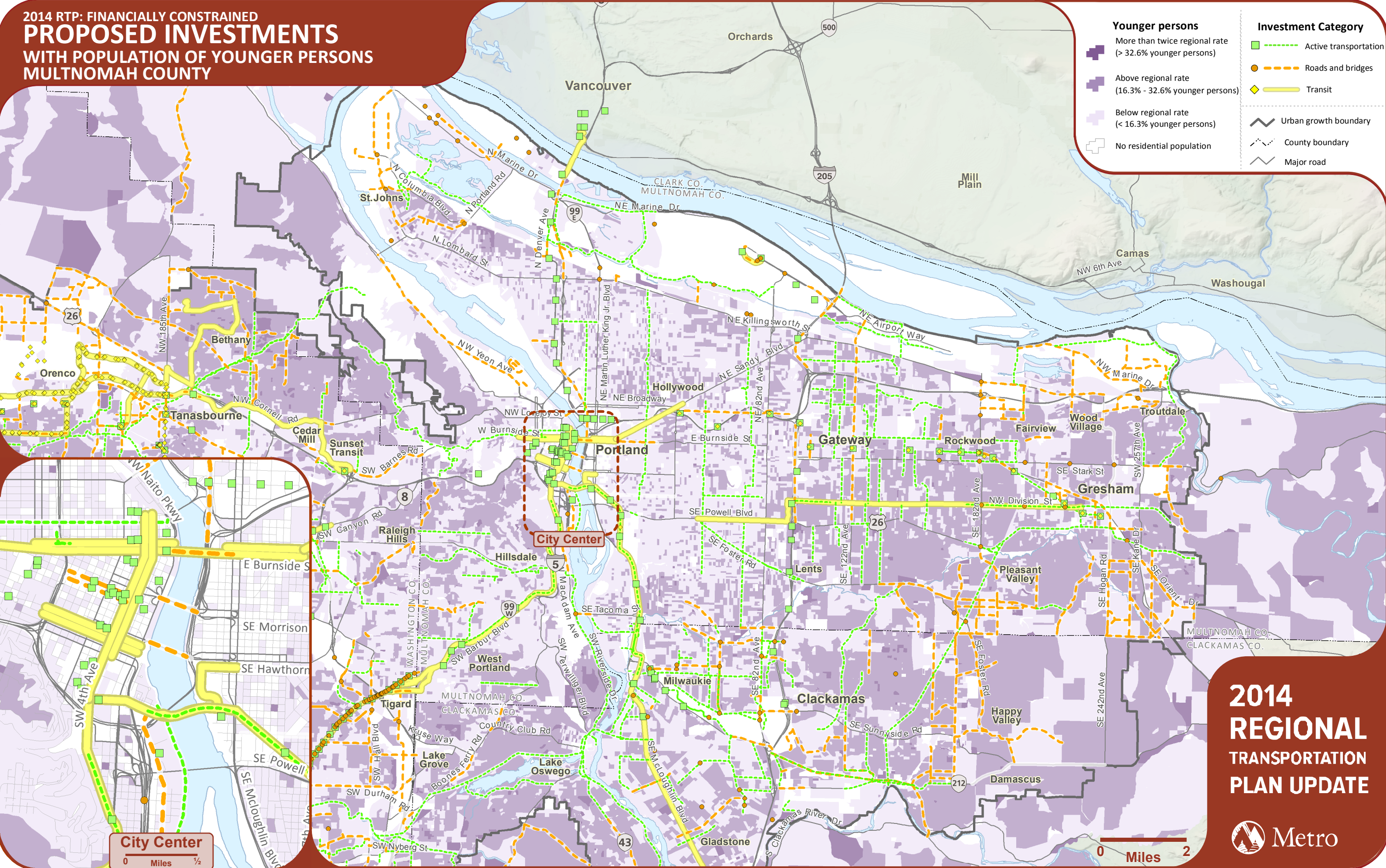
To understand the results of the 2014 RTP quantitative analysis, knowing which transportation investments were included in the assessment is critical. The 2014 RTP used the transportation projects included in the financially constrained project list. The financially constrained project list represents the transportation investments the region would make with the reasonably expected transportation revenues through 2040. The financially constrained project list is not static, therefore specific investments can change.

The RTP recently underwent a public comment period from March 21 through May 5, 2014. As a result the project list of investments may not reflect the number of changes to occur with the project list as a result of public comment. For the 2014 RTP quantitative analysis, the list of investments reflects those received by local jurisdictions as of January 2014. A list of the projects assessed can be found in Appendix A.

The 2014 RTP transportation investments were categorized and mapped according to the categories. Figures 3.1 – 3.15 illustrate the 2014 RTP investments which were assessed in the analysis relative to the locations of the different communities of concern.

Figure 3.1

2014 RTP: FINANCIALLY CONSTRAINED
PROPOSED INVESTMENTS
WITH POPULATION OF YOUNGER PERSONS
MULTNOMAH COUNTY



**2014
REGIONAL
TRANSPORTATION
PLAN UPDATE**



Data sources: U.S. Census Bureau, 2010 Census Summary File 1, Table P12 (census block scale). The population of younger persons is comprised of individuals ages 5-17. Transportation investments shown are those which have an identified spatial element provided by the local nominating agency for the 2014 RTP as of January 2014. Programmatic projects including regional programs are not shown.

Figure 3.2

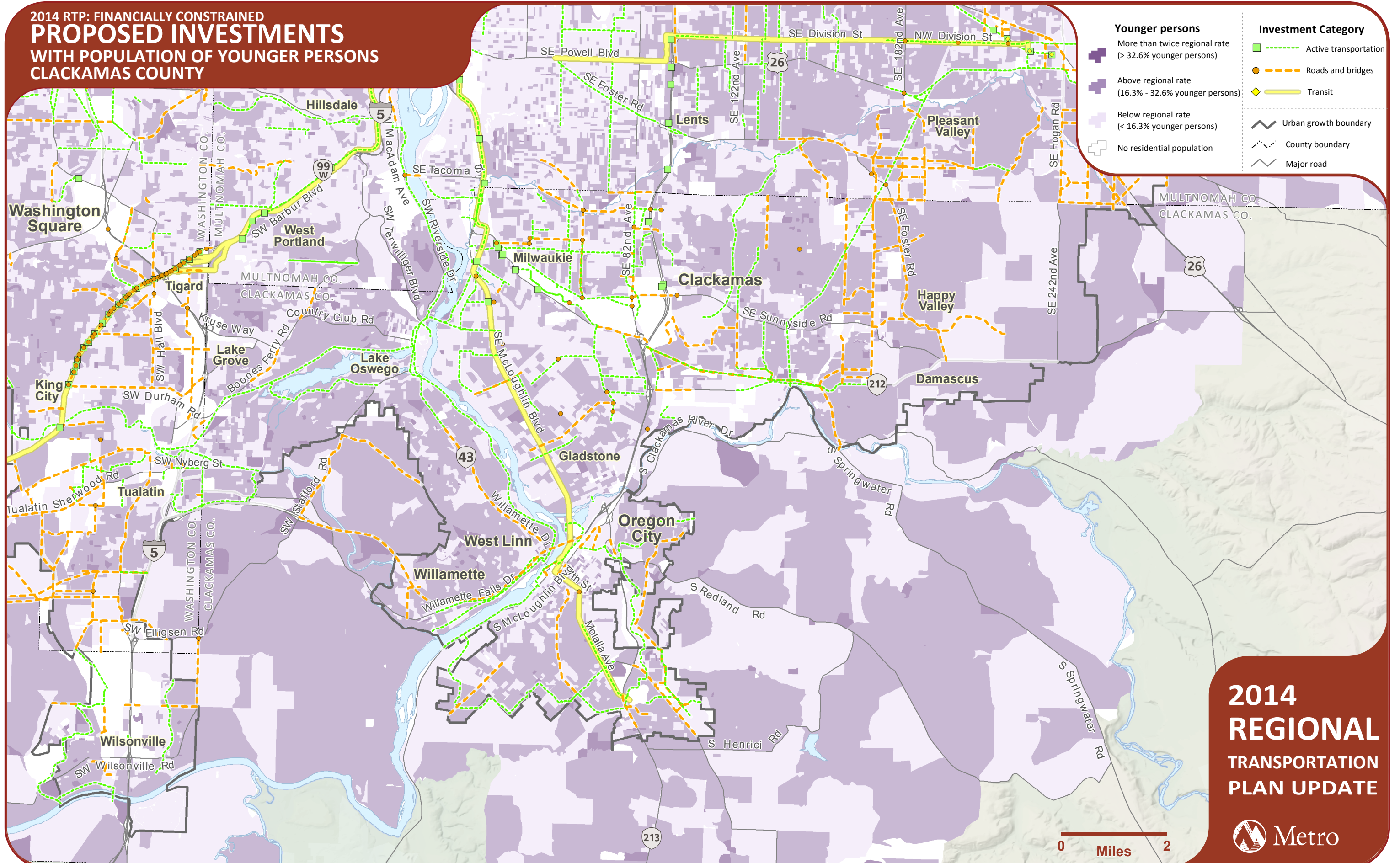


Figure 3.3

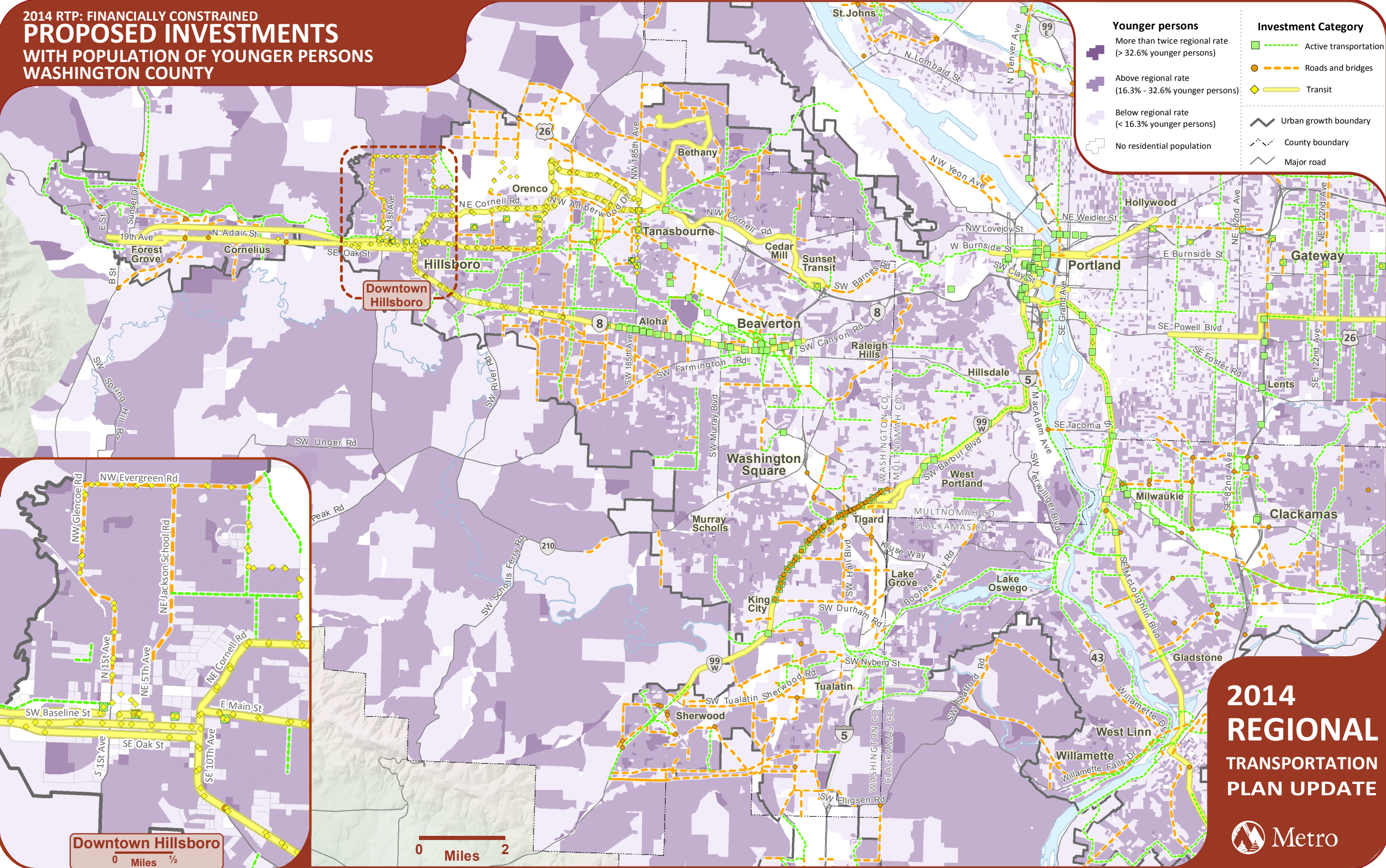
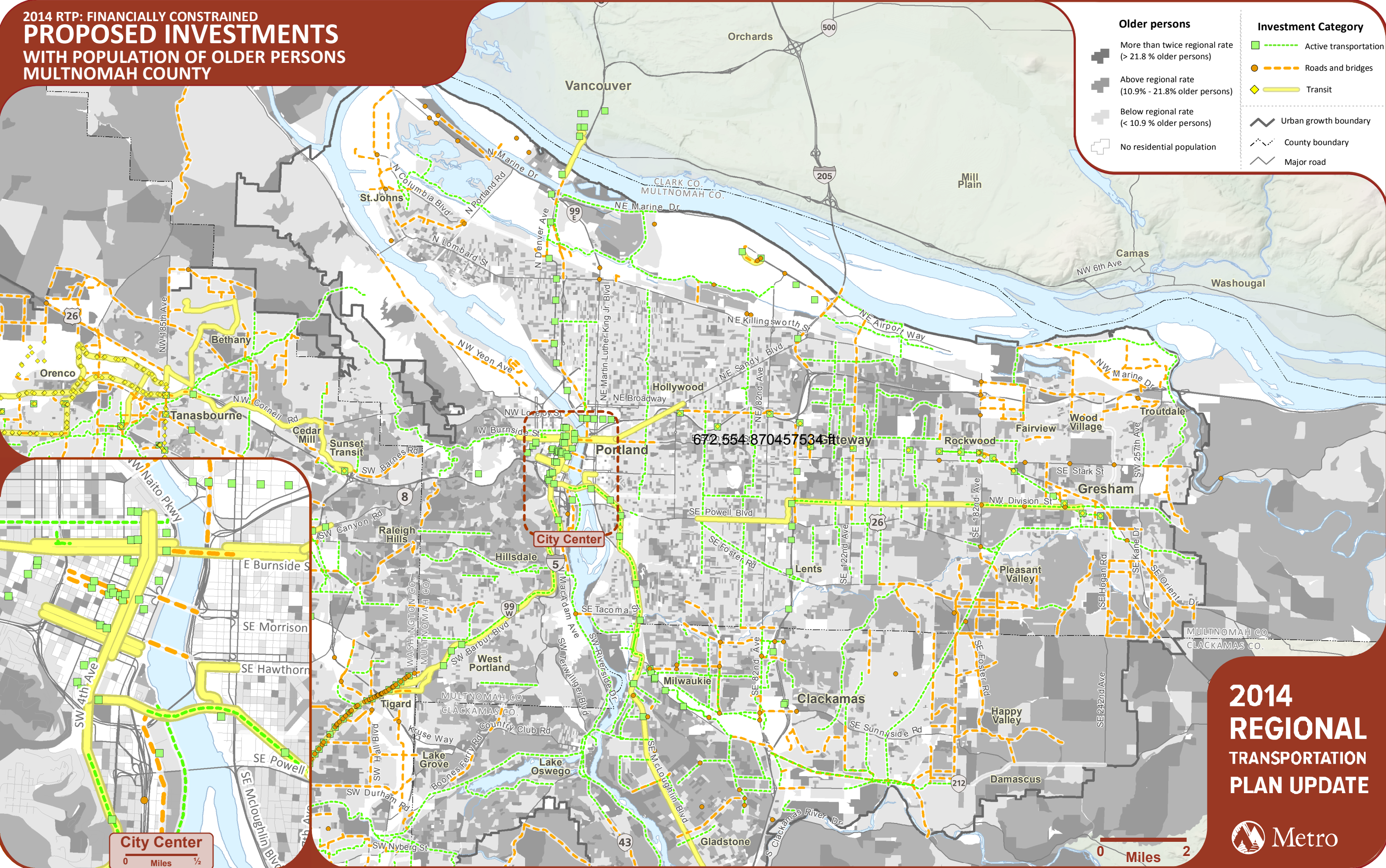


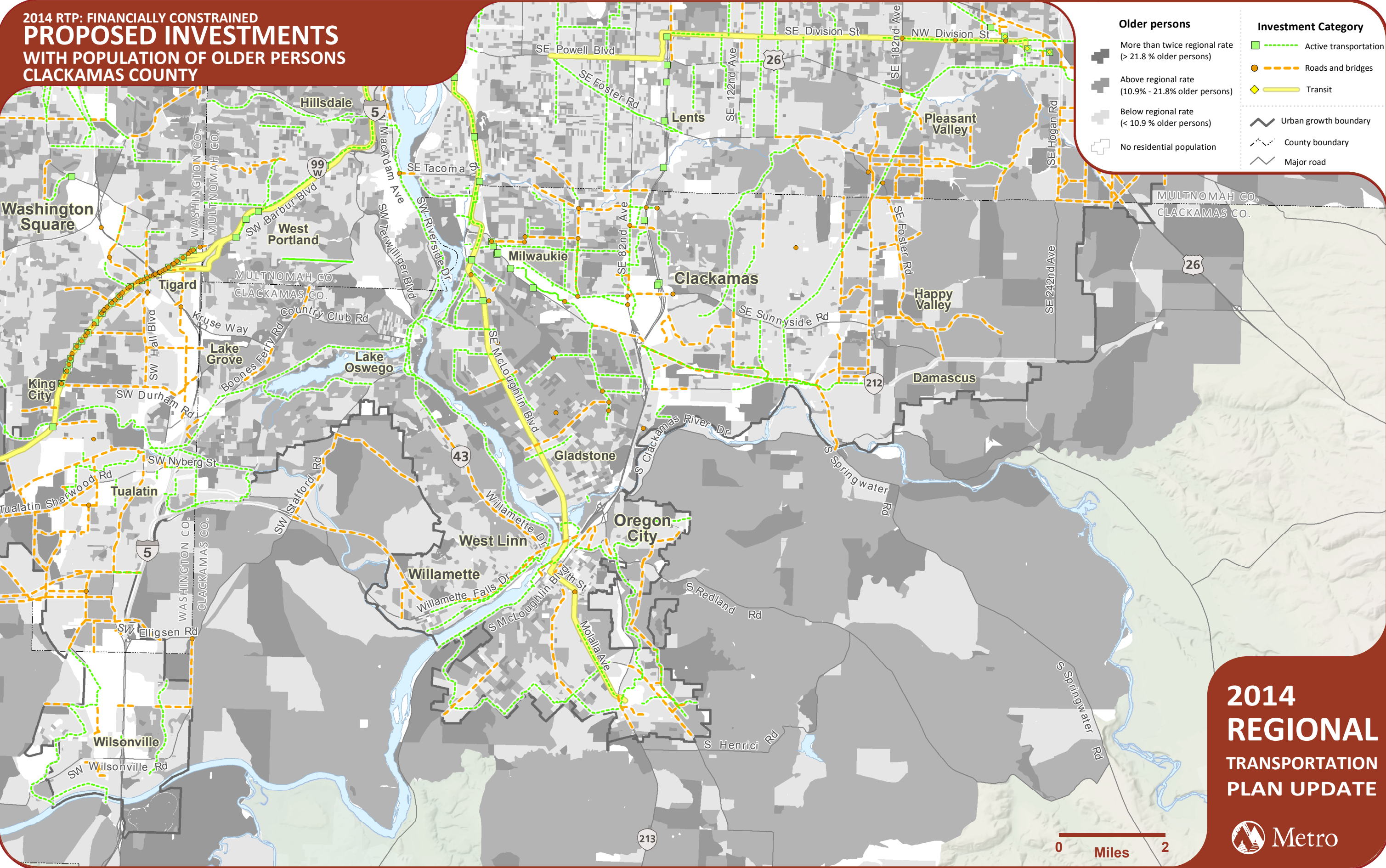
Figure 3.4

2014 RTP: FINANCIALLY CONSTRAINED
PROPOSED INVESTMENTS
WITH POPULATION OF OLDER PERSONS
MULTNOMAH COUNTY



Data sources: U.S. Census Bureau, 2010 Census Summary File 1, Table P12 (census block scale). The population of older persons is comprised of individuals aged 65 years and older. Transportation investments shown are those which have an identified spatial element provided by the local nominating agency for the 2014 RTP as of January 2014. Programmatic projects including regional programs are not shown.

Figure 3.5



Data sources: U.S. Census Bureau, 2010 Census Summary File 1, Table P12 (census block scale). The population of older persons is comprised of individuals aged 65 years and older. Transportation investments shown are those which have an identified spatial element provided by the local nominating agency for the 2014 RTP as of January 2014. Programmatic projects including regional programs are not shown.

2014 RTP and 2015-2018 MTP Environmental Justice and Title VI Report

Figure 3.6

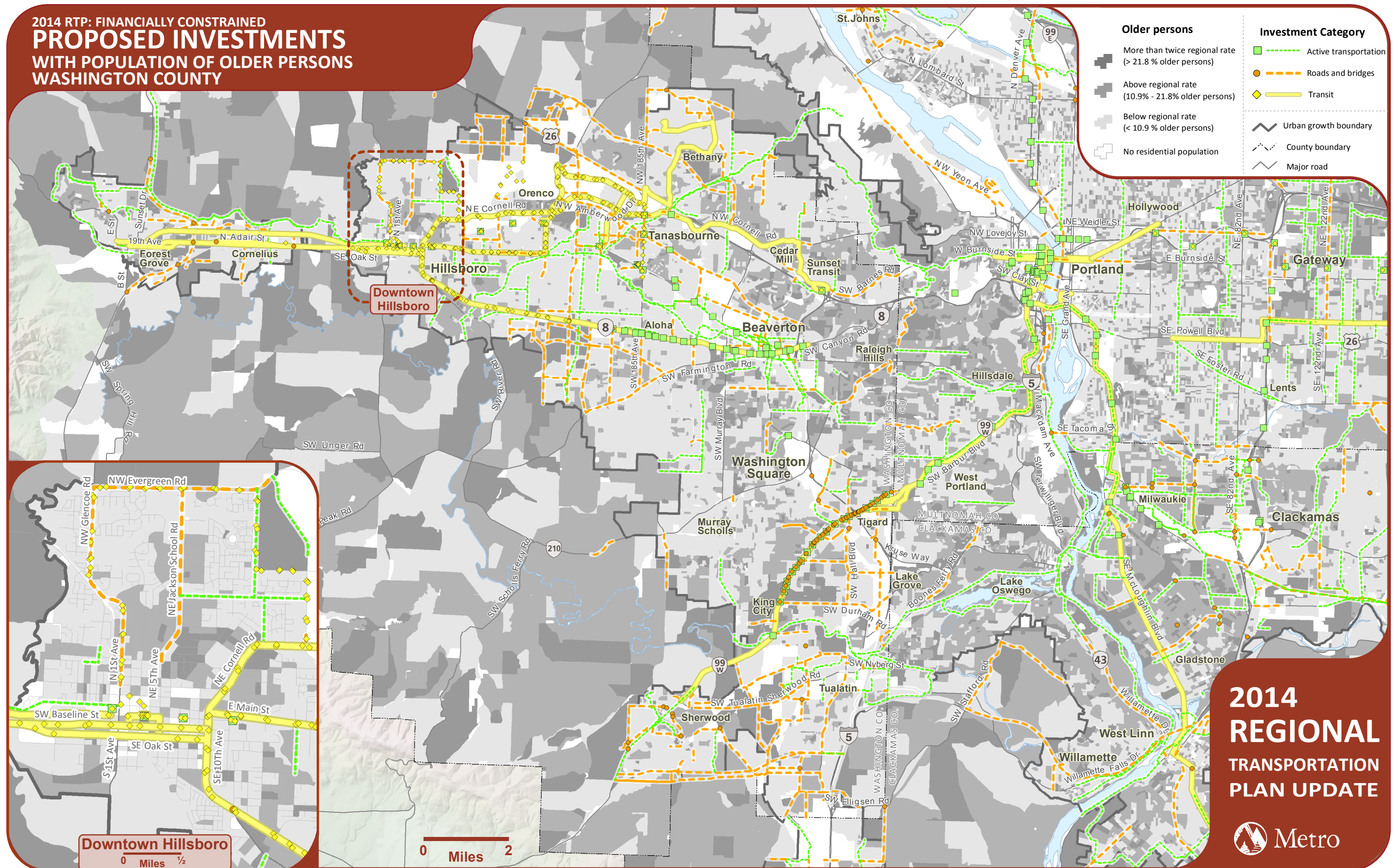
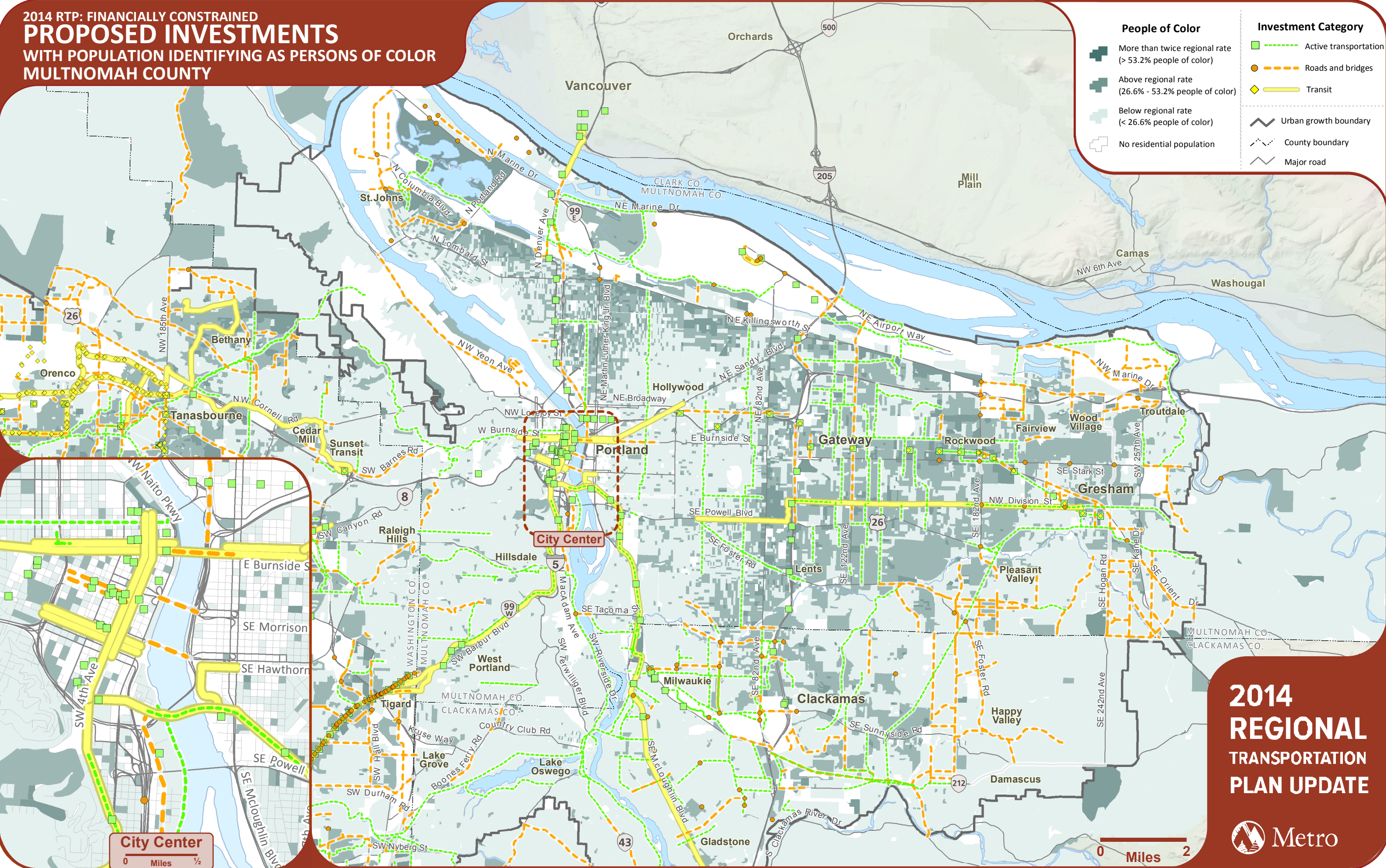


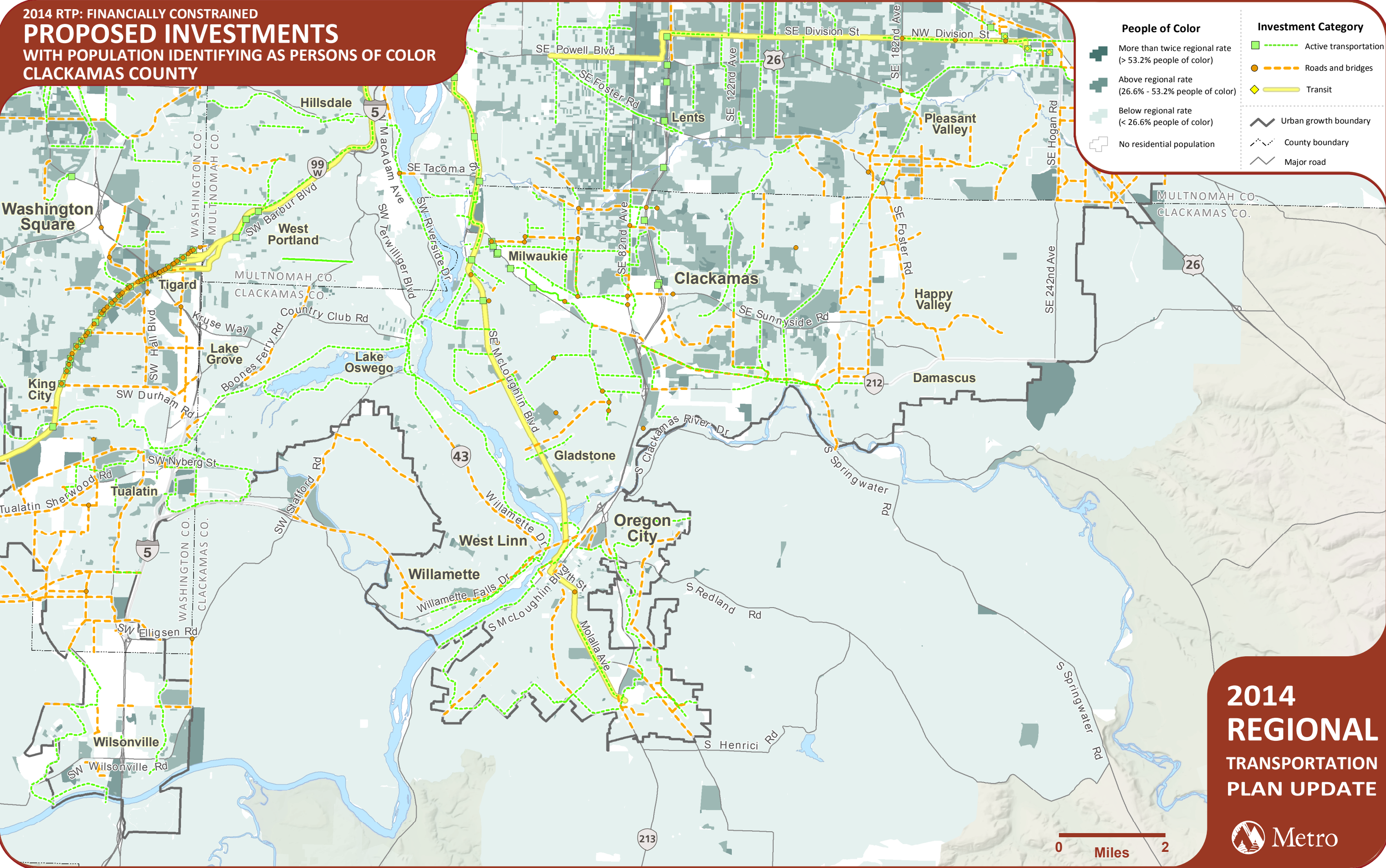
Figure 3.7

2014 RTP: FINANCIALLY CONSTRAINED
PROPOSED INVESTMENTS
WITH POPULATION IDENTIFYING AS PERSONS OF COLOR
MULTNOMAH COUNTY



Data sources: U.S. Census Bureau, 2010 Census Summary File 1, Table P9 (census block scale). People of color was defined broadly to include all races other than white, with or without Hispanic or Latino ethnicity. Transportation investments shown are those which have an identified spatial element provided by the local nominating agency for the 2014 RTP as of January 2014. Programmatic projects including regional programs are not shown.

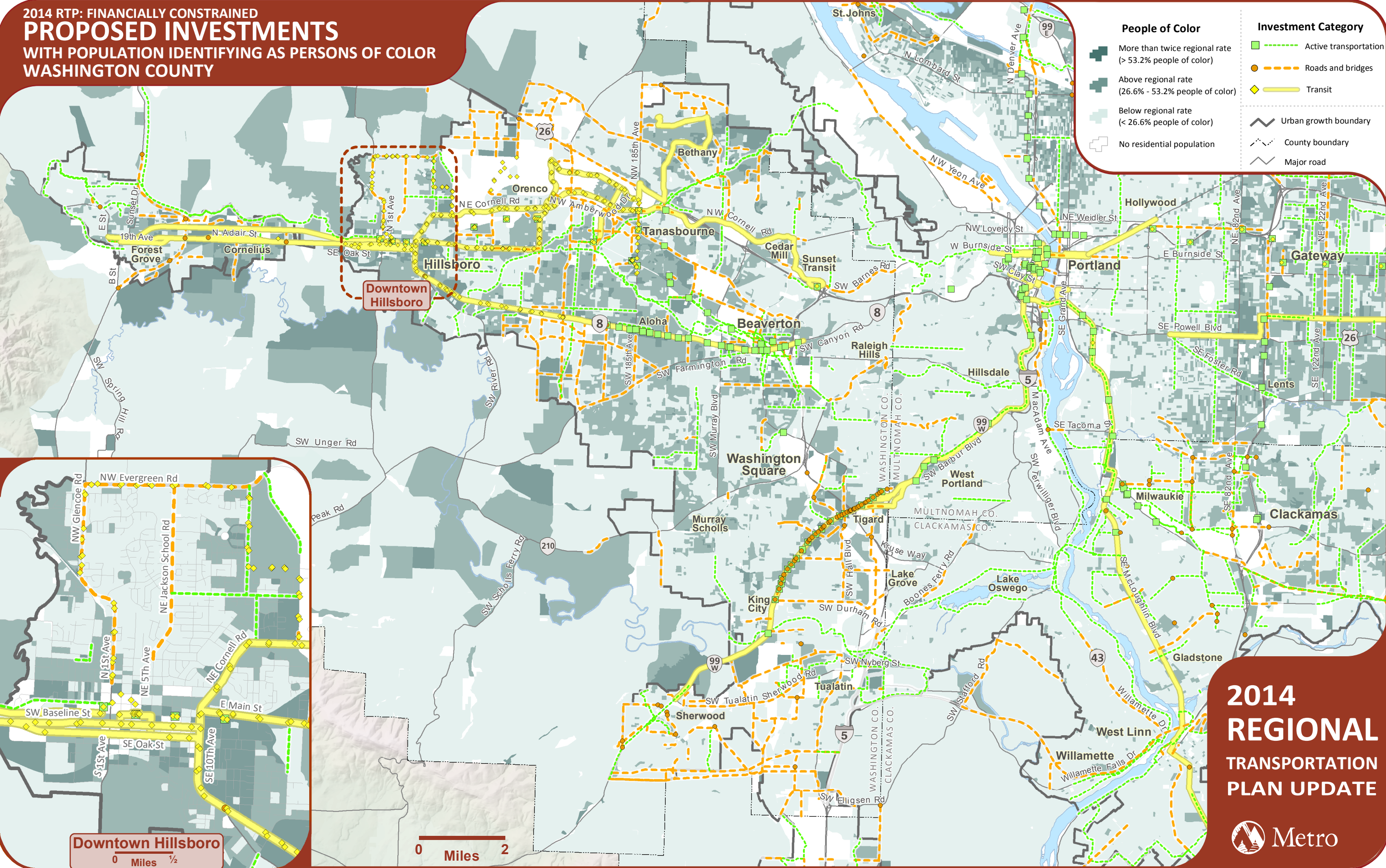
Figure 3.8



Data sources: U.S. Census Bureau, 2010 Census Summary File 1, Table P9 (census block scale). People of color was defined broadly to include all races other than white, with or without Hispanic or Latino ethnicity. Transportation investments shown are those which have an identified spatial element provided by the local nominating agency for the 2014 RTP as of January 2014. Programmatic projects including regional programs are not shown.

Figure 3.9

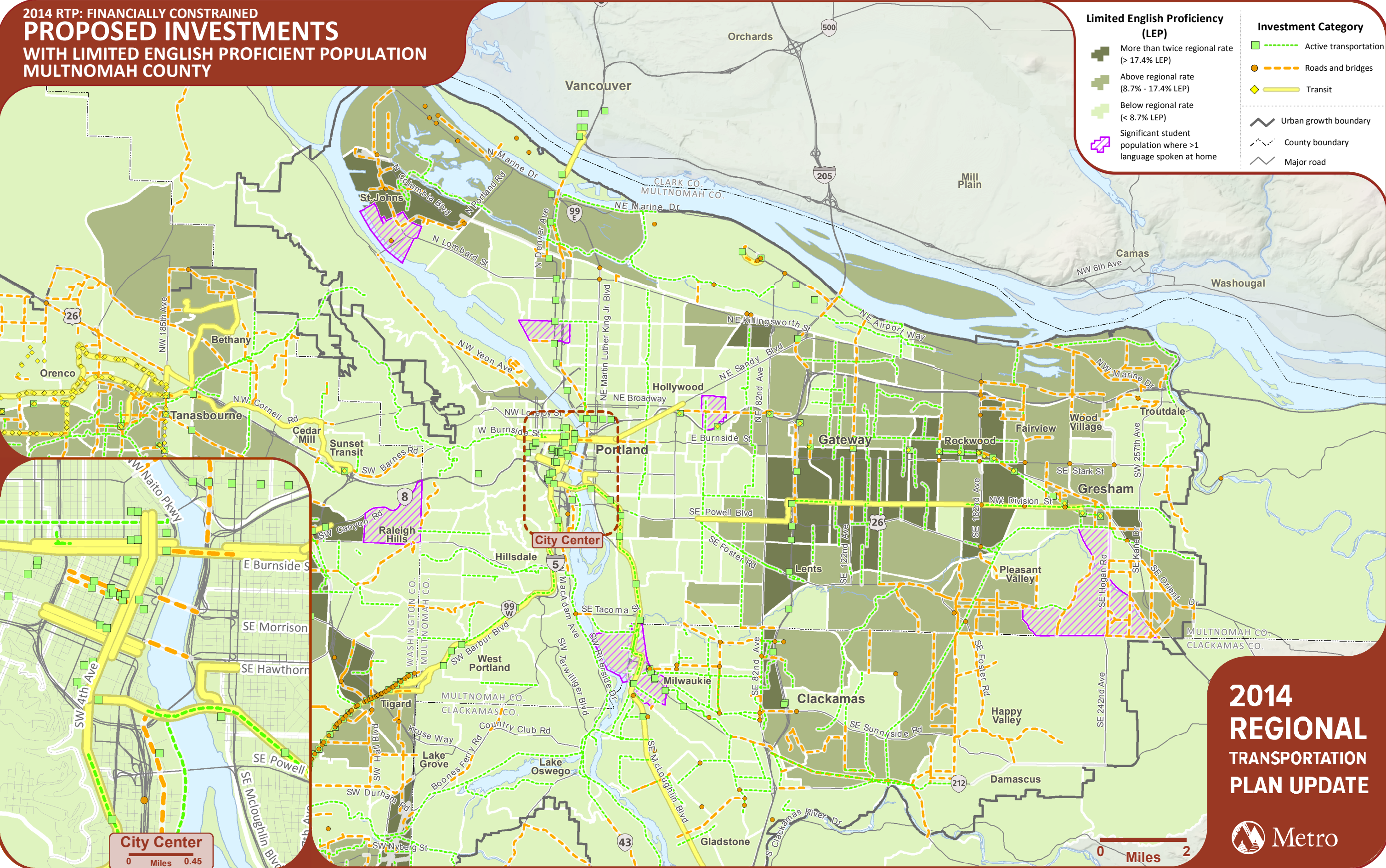
2014 RTP: FINANCIALLY CONSTRAINED
PROPOSED INVESTMENTS
WITH POPULATION IDENTIFYING AS PERSONS OF COLOR
WASHINGTON COUNTY



Data sources: U.S. Census Bureau, 2010 Census Summary File 1, Table P9 (census block scale). People of color was defined broadly to include all races other than white, with or without Hispanic or Latino ethnicity. Transportation investments shown are those which have an identified spatial element provided by the local nominating agency for the 2014 RTP as of January 2014. Programmatic projects including regional programs are not shown.

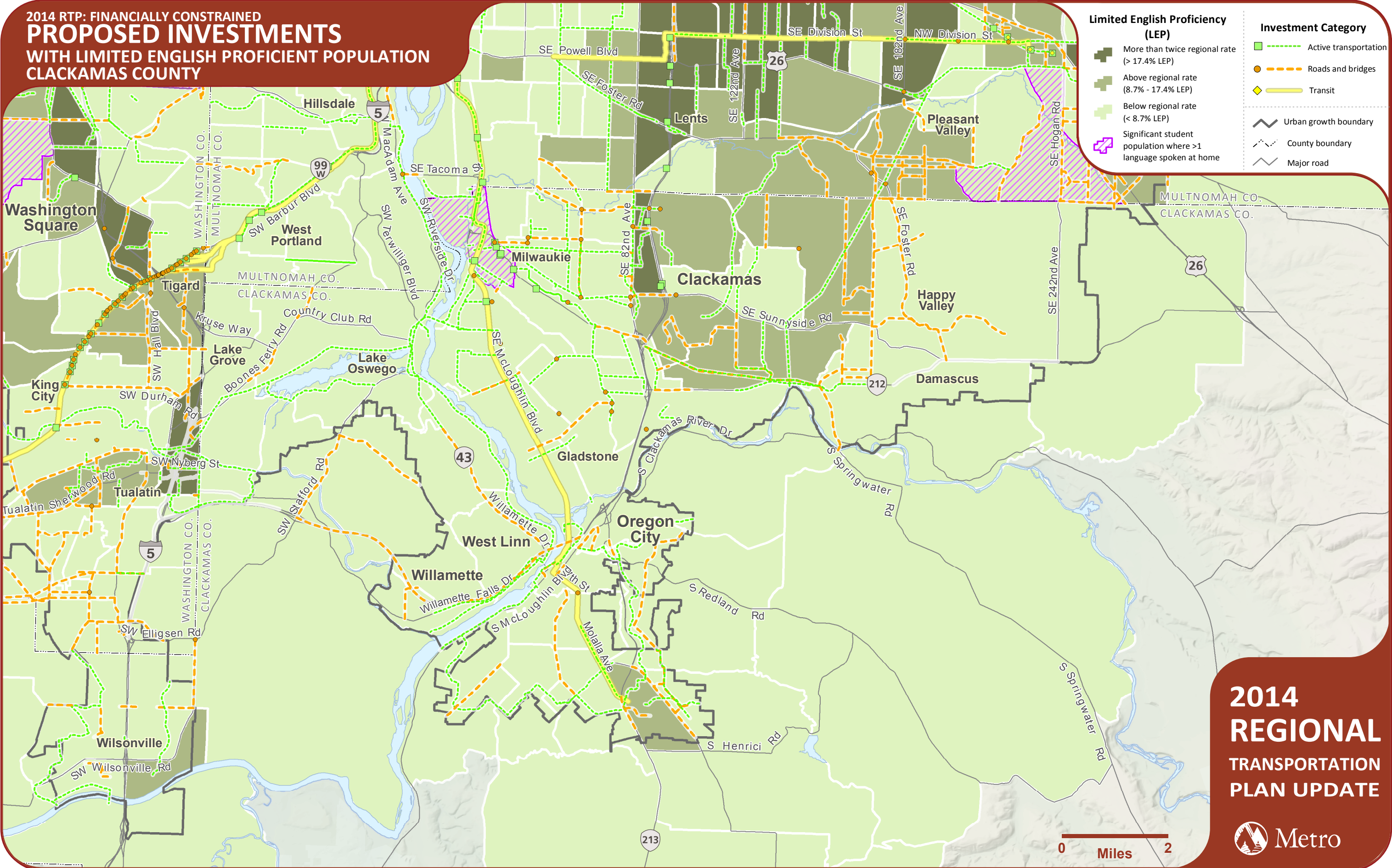
Figure 3.10

2014 RTP: FINANCIALLY CONSTRAINED
PROPOSED INVESTMENTS
WITH LIMITED ENGLISH PROFICIENT POPULATION
MULTNOMAH COUNTY



Data sources: U.S. Census, 2008-2012 American Community Survey, Table DP02 (census tract scale); 2011-2012 Oregon Department of Education. The limited English proficient population was comprised of individuals who spoke English "less than very well". Additional tracts were identified as strong likelihood of concentrated limited English proficiency population based on language spoken at home data from Oregon Department of Education. 2014 RTP and 2015-2018 MTP Environmental Justice and Title VI Report. The nominating agency for the 2014 RTP as of January 2014. Programmatic projects including regional programs are not shown. Map saved 5/13/2014 at M:\plan\dr\projects\14022_EJ_TitleVI_2014\0_MXD\NEW_MXD\RTP_MultnomahCo_LimitedEnglish.mxd

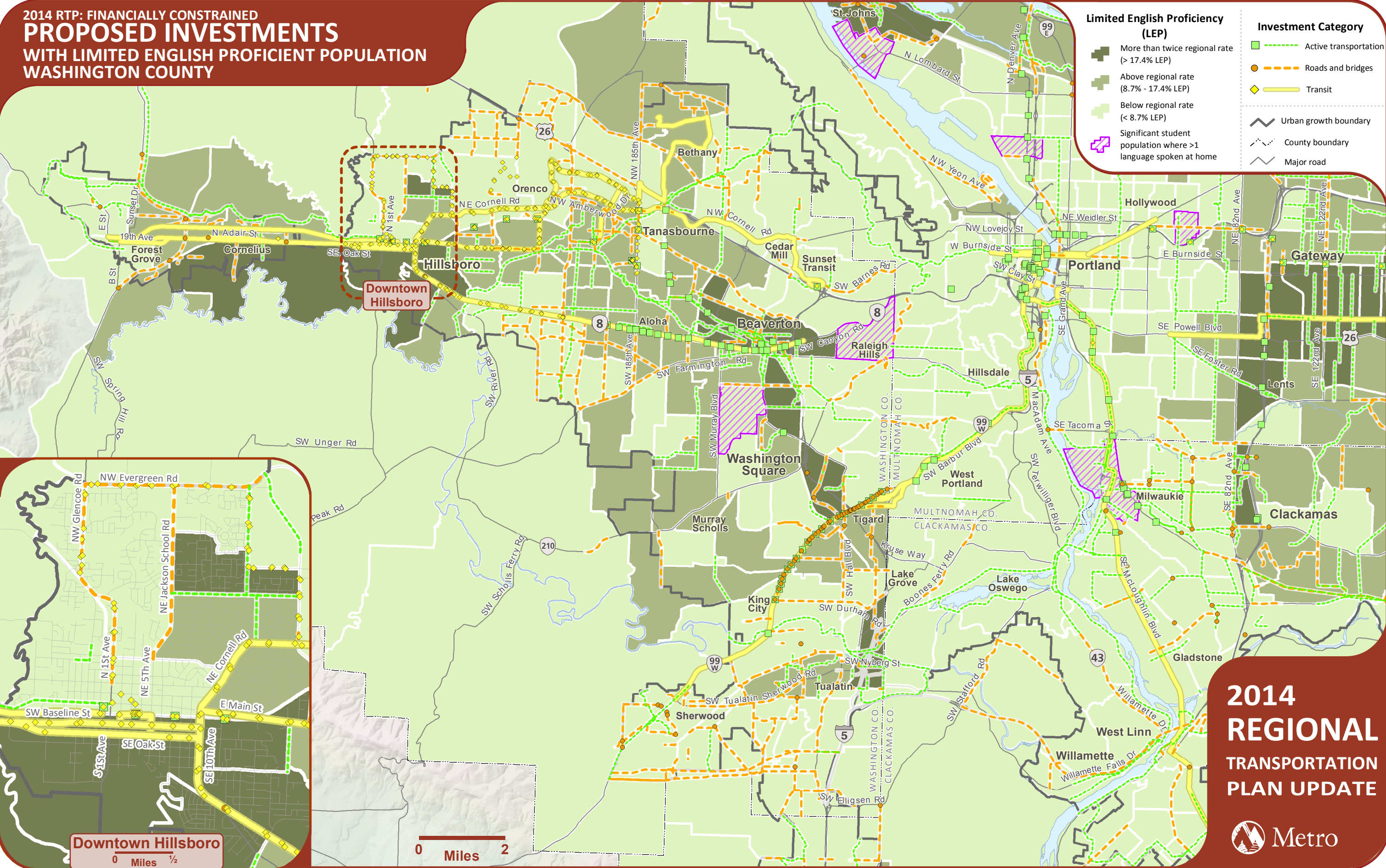
Figure 3.11



Data sources: U.S. Census, 2008-2012 American Community Survey, Table DP02 (census tract scale); 2011-2012 Oregon Department of Education. The limited English proficient population was comprised of individuals who spoke English "less than very well". Additional tracts were identified as strong likelihood of concentrated limited English proficiency population based on language spoken at home data from Oregon Department of Education. 2014 RTP and 2015-2018 MTP Environmental Justice and Title VI Report. The nominating agency for the 2014 RTP as of January 2014. Programmatic projects including regional programs are not shown. Map saved 5/13/2014 at M:\plan\drc\projects\14022_EJ_TitleVI_2014\0_MXD\NEW_MXD\RTP_ClackamasCo_LimitedEnglish.mxd

Figure 3.12

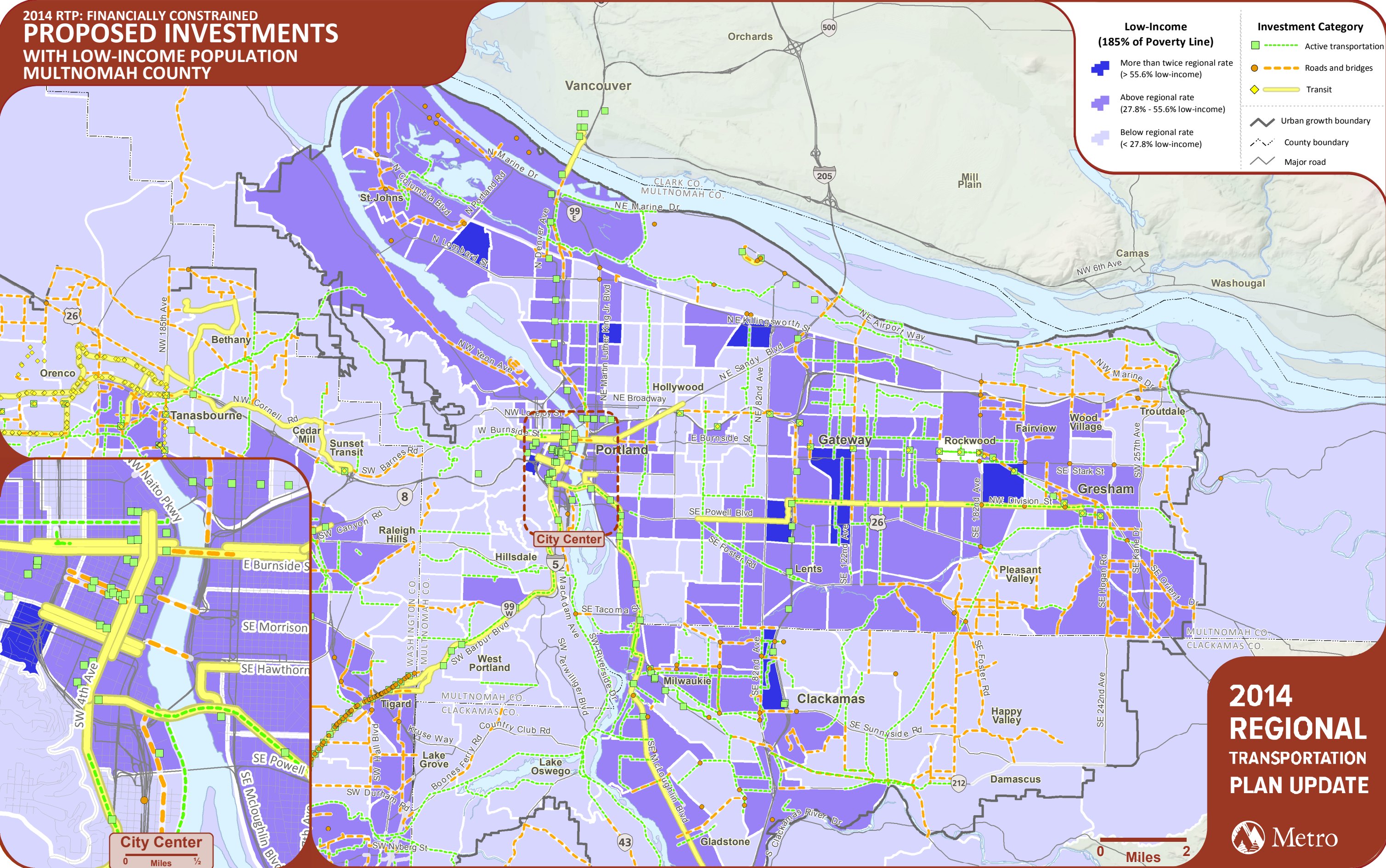
2014 RTP: FINANCIALLY CONSTRAINED
PROPOSED INVESTMENTS
WITH LIMITED ENGLISH PROFICIENT POPULATION
WASHINGTON COUNTY



Data sources: U.S. Census, 2008-2012 American Community Survey, Table DP02 (census tract scale); 2011-2012 Oregon Department of Education. The limited English proficient population was comprised of individuals who spoke English "less than very well". Additional tracts were identified as strong likelihood of concentrated limited English proficiency population based on language spoken at home data from Oregon Department of Education. 2014 RTP and 2015-2018 MTP Environmental Justice and Title VI Report. Metro is the nominating agency for the 2014 RTP as of January 2014. Programmatic projects including regional programs are not shown. Map saved 5/13/2014 at M:\plan\dr\projects\14022_EJ_TitleVI_2014\0_MXD\NEW_MXD\RTP_WashingtonCo_LimitedEnglish.mxd

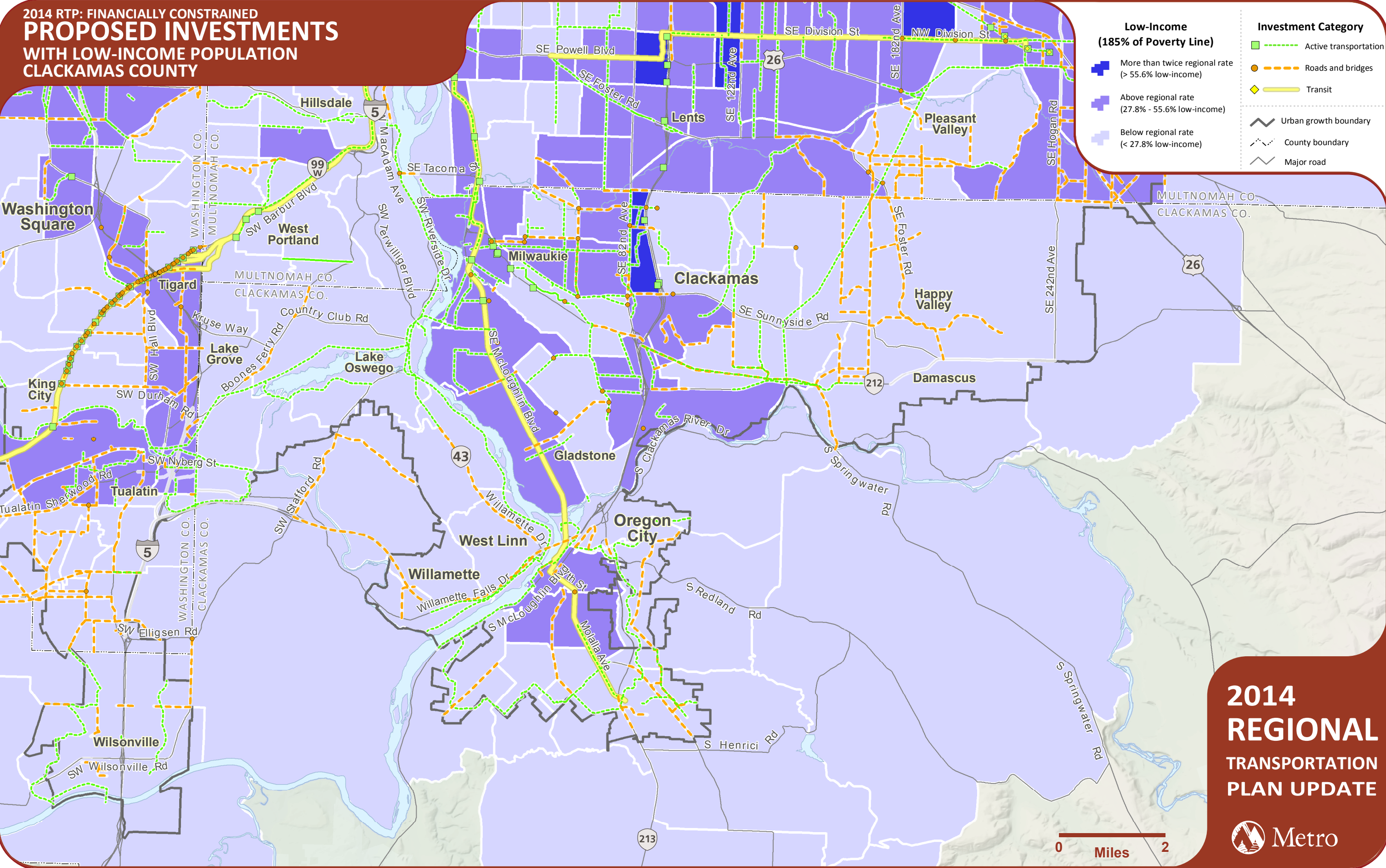
Figure 3.13

2014 RTP: FINANCIALLY CONSTRAINED
PROPOSED INVESTMENTS
WITH LOW-INCOME POPULATION
MULTNOMAH COUNTY



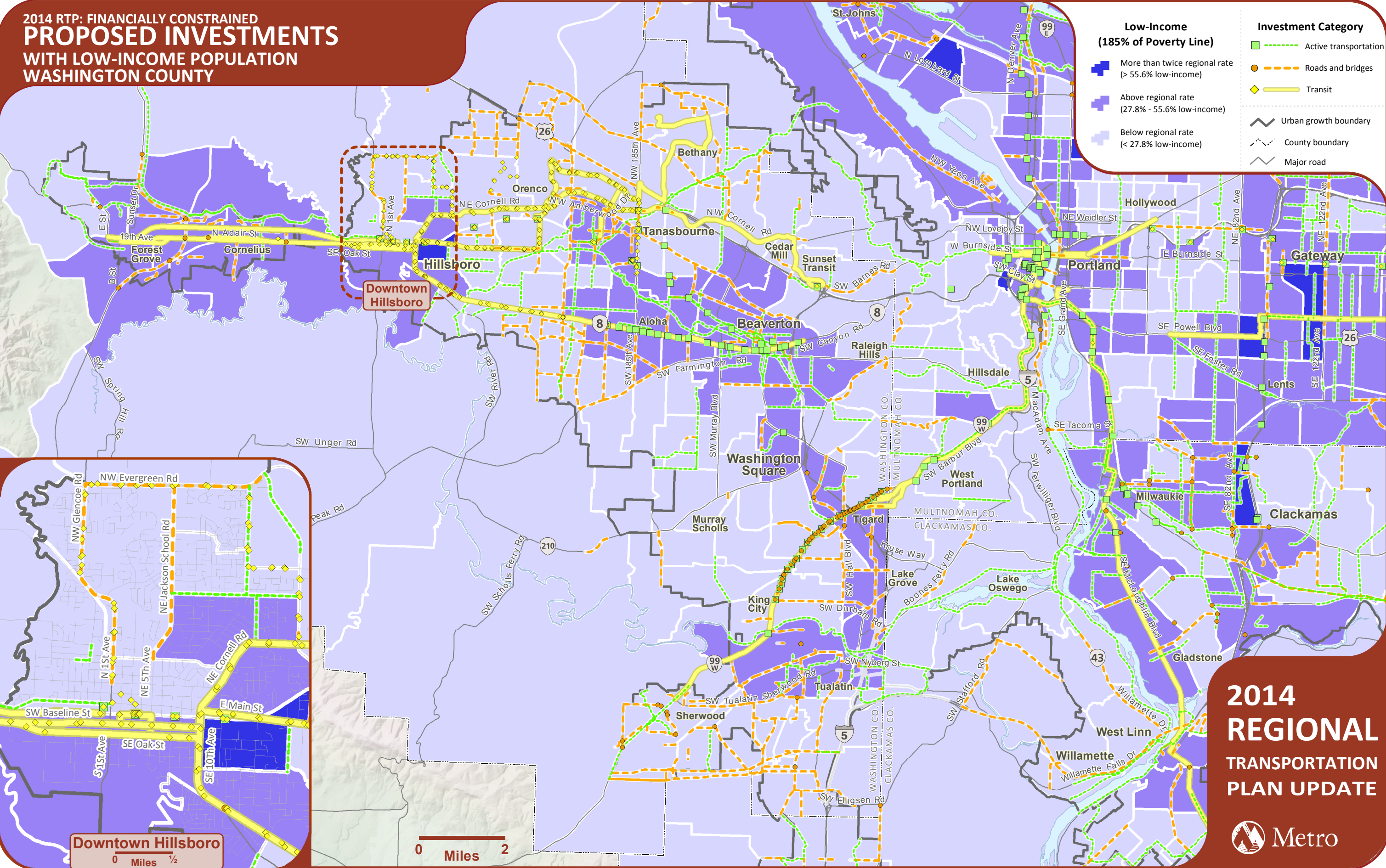
Data sources: U.S. Census Bureau, 2008-2012 American Community Survey, Table S1701 (census tract scale). The low-income population was comprised of individuals in households below 185% of federal poverty guidelines. Transportation investments shown are those which have an identified spatial element provided by the local nominating agency for the 2014 RTP as of January 2014. Programmatic projects including regional programs not shown.

Figure 3.14



Data sources: U.S. Census Bureau, 2008-2012 American Community Survey, Table S1701 (census tract scale). The low-income population was comprised of individuals in households below 185% of federal poverty guidelines. Transportation investments shown are those which have an identified spatial element provided by the local nominating agency for the 2014 RTP as of January 2014. Programmatic projects including regional programs not shown.

Figure 3.15



As a reminder, the 2014 RTP analysis reflects the aggregate transportation investments in communities of concern reflect only those investments in the 2014 RTP which had enough spatial information to be mapped; whereas the total regional transportation investment benchmark includes all 2014 RTP investments regardless of spatial information. (See Chapter 2 for more detail on the quantitative analysis methodology.)

Disproportionate Investment Analysis Results

Table 3-1 illustrates the 2014 RTP regionwide transportation investments per person per acre and for the entire population of the five communities of concern.

Table 3-1. 2014 RTP Transportation Investments Regionwide and in Entire Community of Concern Population

	Regional Total Investment	Regional Young Persons Total Investment	Regional Older Person Total Investment	Regional People of Color Total Investment	Regional Limited English Proficiency Total Investment	Regional Low Income Total Investment
2014 RTP	\$0.01408	\$0.18029	\$0.13027	\$0.12024	\$0.34496	\$0.09506

The 2014 RTP reflects 27 years of transportation investments reasonable expected for the region. Despite the long time frame of investments, once the total population is considered and when normalizing for population density, the total regional transportation investment per person per acre is understandably very small at less than 1 cent per person per acre. Nonetheless, what is observed from the quantitative analysis is that each community of concern receives a greater amount of transportation investment than the rest of the region.

In looking further at the 2014 RTP transportation investments made in concentrated areas of communities of concern, as illustrated in Table 3-2, the quantitative analysis reinforces even in concentrated areas of communities of concern transportation investments levels are greater than the total regional investment.

Table 3-2. 2014 RTP Transportation Investments Regionwide and in Concentrated Areas of Communities of Concern

	Regional Total Investment	Total Community Investment in Areas of Concentrated Young Persons	Total Community Investment in Areas of Concentrated Older Persons	Total Community Investment in Areas of Concentrated People of Color	Total Community Investment in Areas of Limited English Proficiency Persons	Total Community Investment in Areas of Low Income Persons
2014 RTP	\$0.01287	\$0.02943	\$0.05572	\$0.11159	\$0.13308	\$0.13192

Lastly, Table 3-3 illustrates the 2014 RTP investments by category for the region and within the entire populations of the five communities of concern. The quantitative analysis shows at a programmatic scale, across the three investment categories, the communities of concern receive greater investment than region.

Table 3-3. 2014 RTP Transportation Investments by Category for Region and Communities of Concern

	Regional Total Investment	Regional Young Person Total Investment	Regional Older Person Total Investment	Regional People of Color Total Investment	Regional Limited English Proficiency Person Total Investment	Regional Low Income Person Total Investment
Active Transportation	\$0.00124	\$0.00497	\$0.00610	\$0.01632	\$0.01053	\$0.01192
Roads and Bridges	\$0.00890	\$0.01757	\$0.04029	\$0.06502	\$0.09755	\$0.08275
Public Transit	\$0.00274	\$0.00690	\$0.00934	\$0.03024	\$0.02499	\$0.03725

Based on the quantitative analysis, the main result which resonates in the different breakdown of investments and in each community of concern, the 2014 RTP disproportionately overinvests in communities of concern.

Disparate Impact Analysis Results

The disparate impact analysis looks at the ratio of the region's total transportation investments to the total transportation investments for an entire community of concern. Table 3-4 illustrates the results of the ratio of transportation investment in communities of concern relative to the region.

Table 3-4. 2014 RTP Disparate Impact Analysis

	Region	Young Person	DIA Ratio	Older Person	DIA Ratio	People of Color	DIA Ratio	Limited English Proficiency Person	DIA Ratio
2014 RTP	\$0.00274	\$0.00690	2.51	\$0.00934	3.41	\$0.03024	11.0	\$0.02499	9.12
	Low Income	DIA Ratio							
2014 RTP	\$0.03725	13.6							

The rates of 2014 RTP transit investment for each community of concern are above the regional rate for each community of concern.⁸ Again, these results reflect the financially constrained federal and state capital investments in public transit as outlined by the Federal Transit Administration's Title VI guidance for what is required for the assessment. The analysis results do not reflect operating cost investments as public transit operating costs are funded through local investments.

⁸ As there is a higher rate of investment in each community of concern compared to the regional rate, Metro staff makes the determination that the quantitative analysis reveals no disparate impact. Due to concern about the proper metric against which to make future determinations (see footnote 7), Metro staff recommends additional refinement of assessment methodology to determine the proper comparative metrics for future assessments.

Chapter 4: 2015-2018 Metropolitan Transportation Improvement Program Quantitative Analysis Results

This chapter provides an overview of the quantitative analysis results and initial findings for the 2015-2018 Metropolitan Transportation Improvement Program (MTIP).

Quantitative Analysis Background

To understand the results of the 2015-2018 MTIP quantitative analysis, knowing which transportation investments were included in the assessment is critical. The 2015-2018 MTIP used the transportation projects which were programmed with federal or state funds for federal fiscal years 2015-2018. The list of 2015-2018 investments came from the public comment draft of the 2015-2018 MTIP. The MTIP is a continually amended document to reflect the most recent programming based on the latest project delivery information, therefore the list of investments identified in the public comment draft can only be considered a snapshot of the region's short-term investment package at a given time. For the 2015-2018 MTIP quantitative analysis of investments the snapshot in time is March 21, 2014. A list of the projects assessed can be found in Appendix B.

The 2015-2018 MTIP transportation investments were categorized and mapped according to the categories. Figures 4.1 – 4.5 illustrate the 2015-2018 MTIP investments which were assessed in the analysis relative to the locations of the different communities of concern.

Figure 4.1

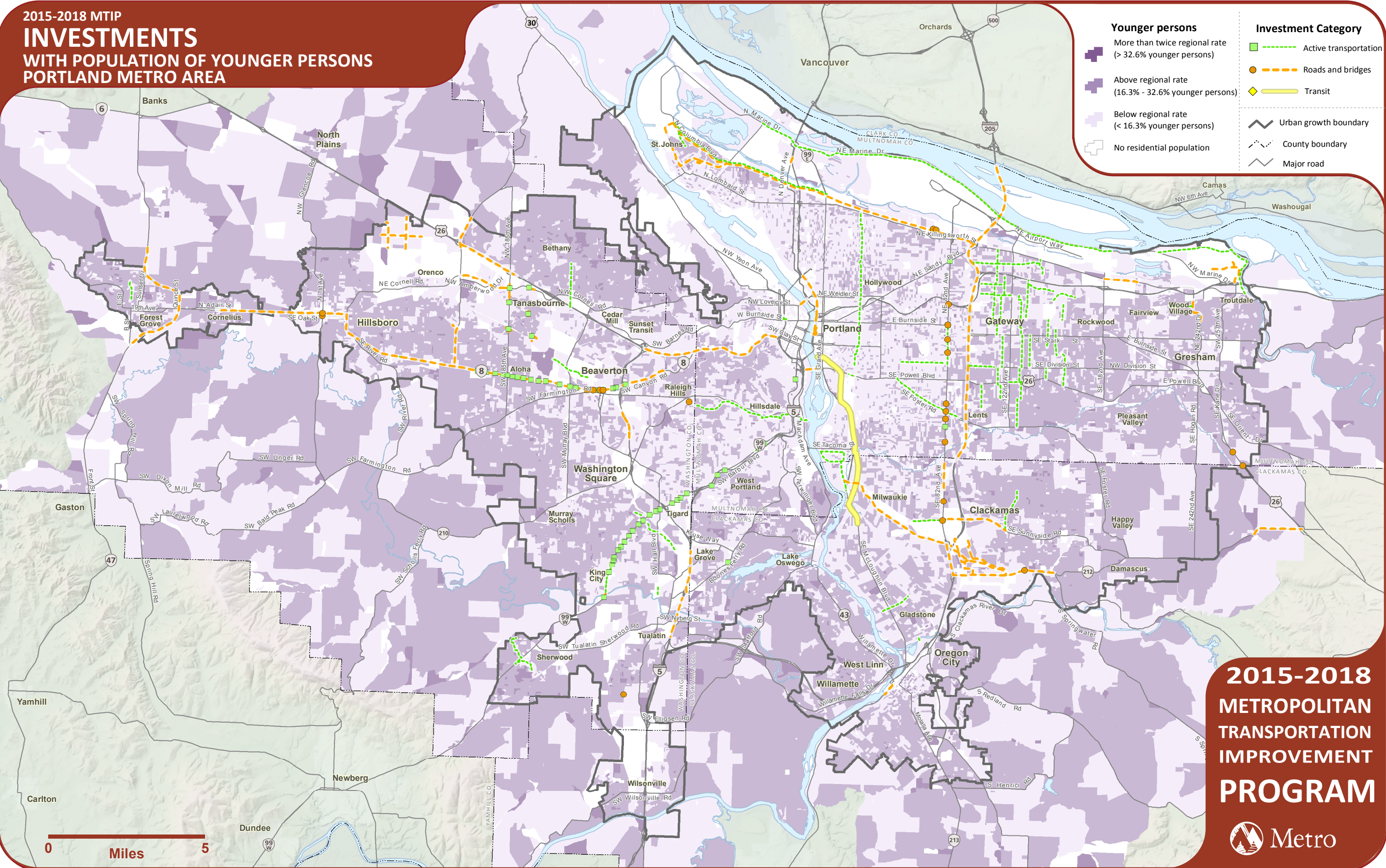
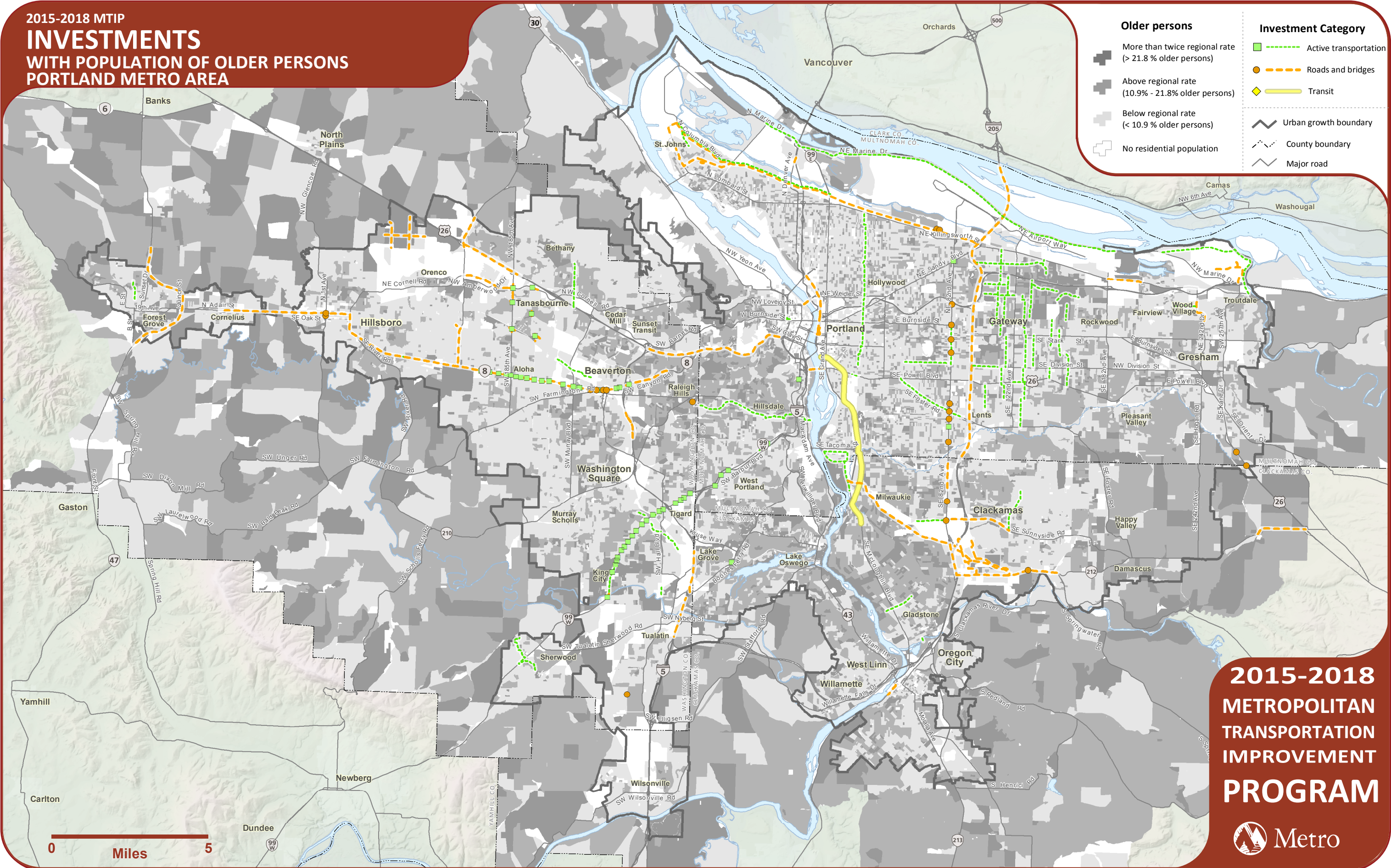


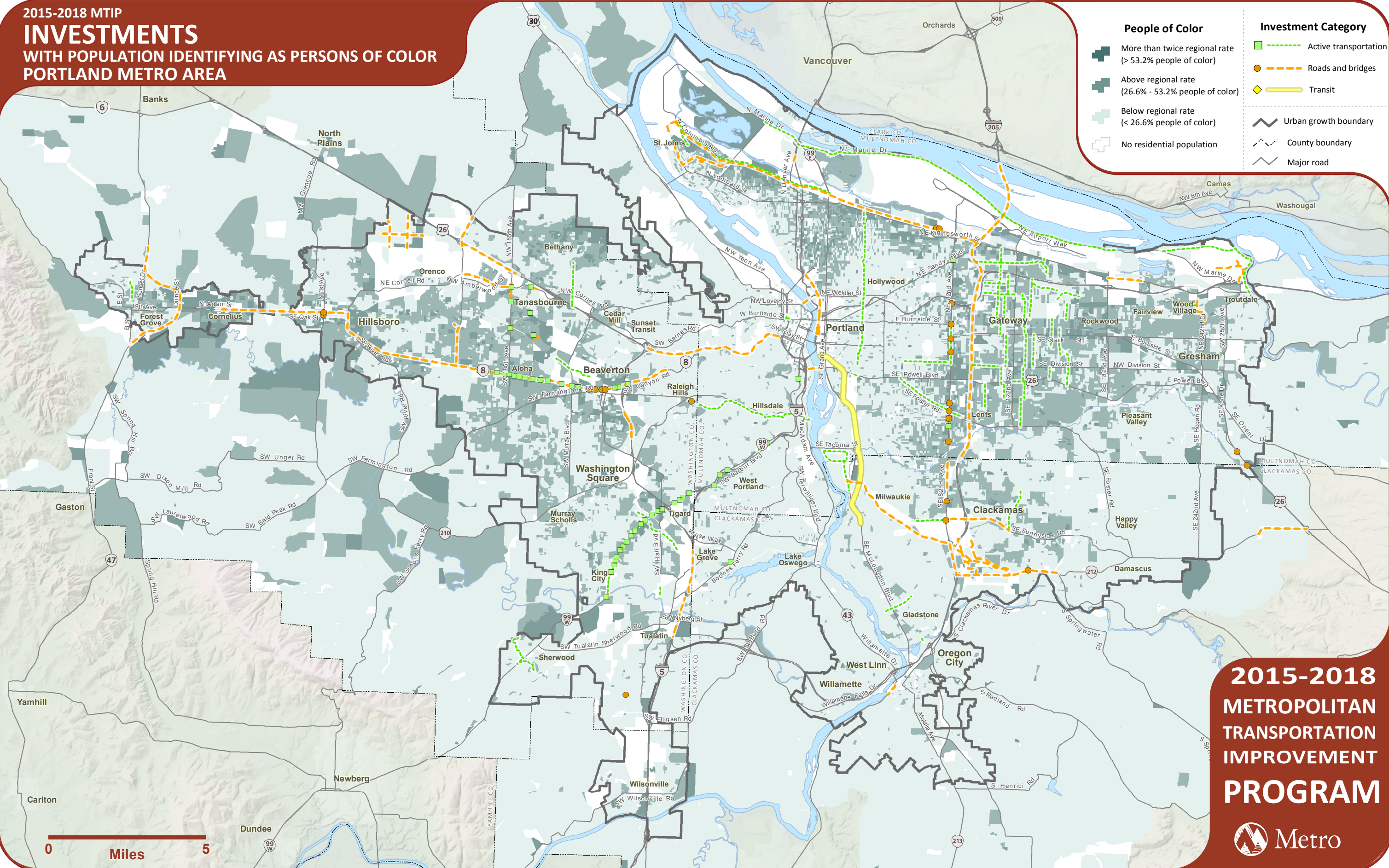
Figure 4.2



Data sources: U.S. Census Bureau, 2010 Census Summary File 1, Table P12 (census block scale). The population of older persons is comprised of individuals aged 65 years and older. Transportation investments shown are those which have an identified spatial element provided by the local nominating agency for the 2014 RTP as of January 2014. Programmatic projects including regional programs are not shown.

Figure 4.3

2015-2018 MTIP
INVESTMENTS
WITH POPULATION IDENTIFYING AS PERSONS OF COLOR
PORTLAND METRO AREA



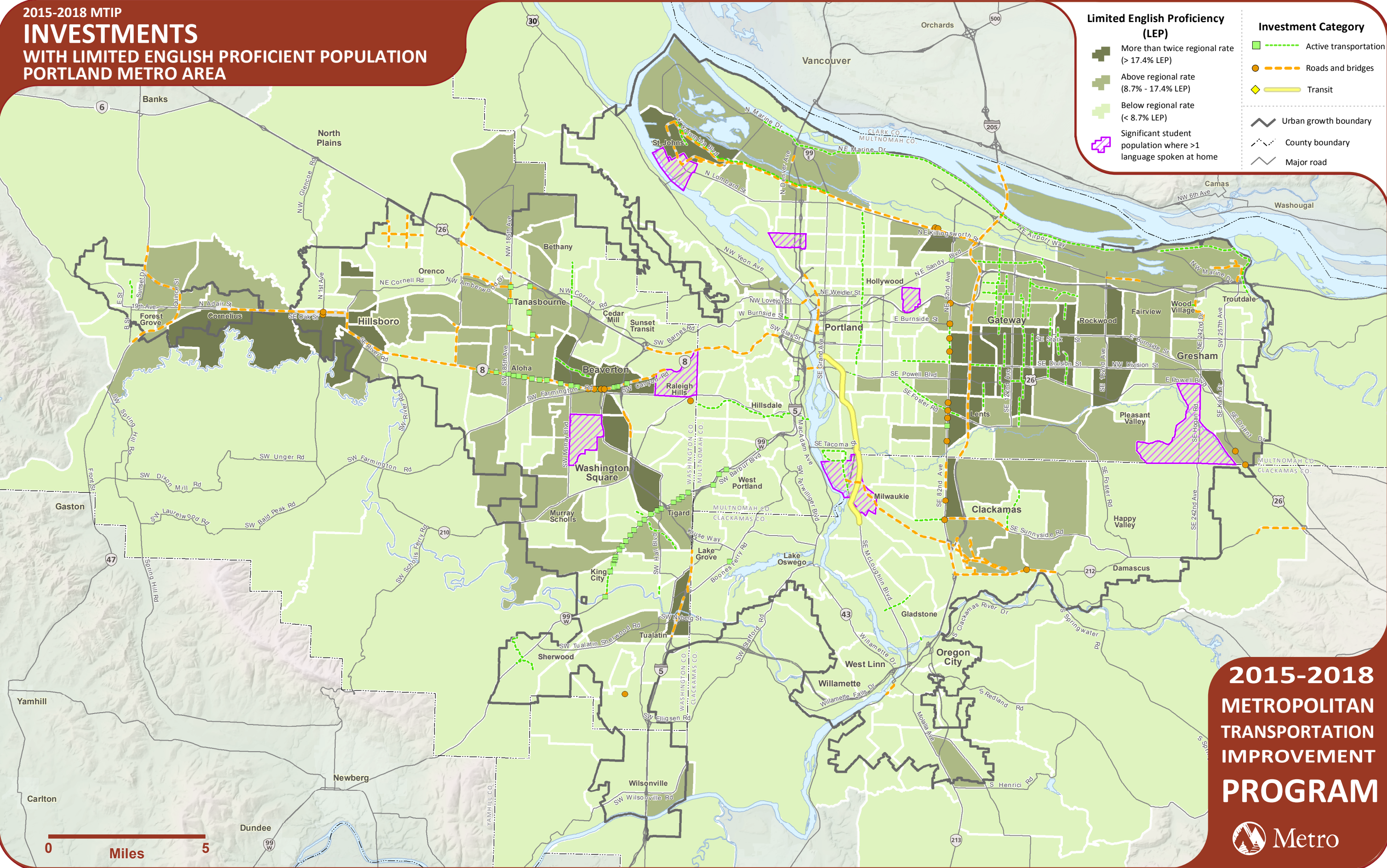
**2015-2018
METROPOLITAN
TRANSPORTATION
IMPROVEMENT
PROGRAM**



Data sources: U.S. Census Bureau, 2010 Census Summary File 1, Table P9 (census block scale). People of color was defined broadly to include all races other than white, with or without Hispanic or Latino ethnicity. Transportation investments shown are those which have an identified spatial element provided by the local nominating agency for the 2014 RTP as of January 2014. Programmatic projects including regional programs are not shown.
2014 RTP and 2015-2018 MTIP Environmental Justice and Title VI Report
plan\proj\14022_EJ_TitleVI_2014\0_MXD\NEW_MXD\MTIP_PeopleOfColor.mxd

Figure 4.4

2015-2018 MTIP
INVESTMENTS
WITH LIMITED ENGLISH PROFICIENT POPULATION
PORTLAND METRO AREA

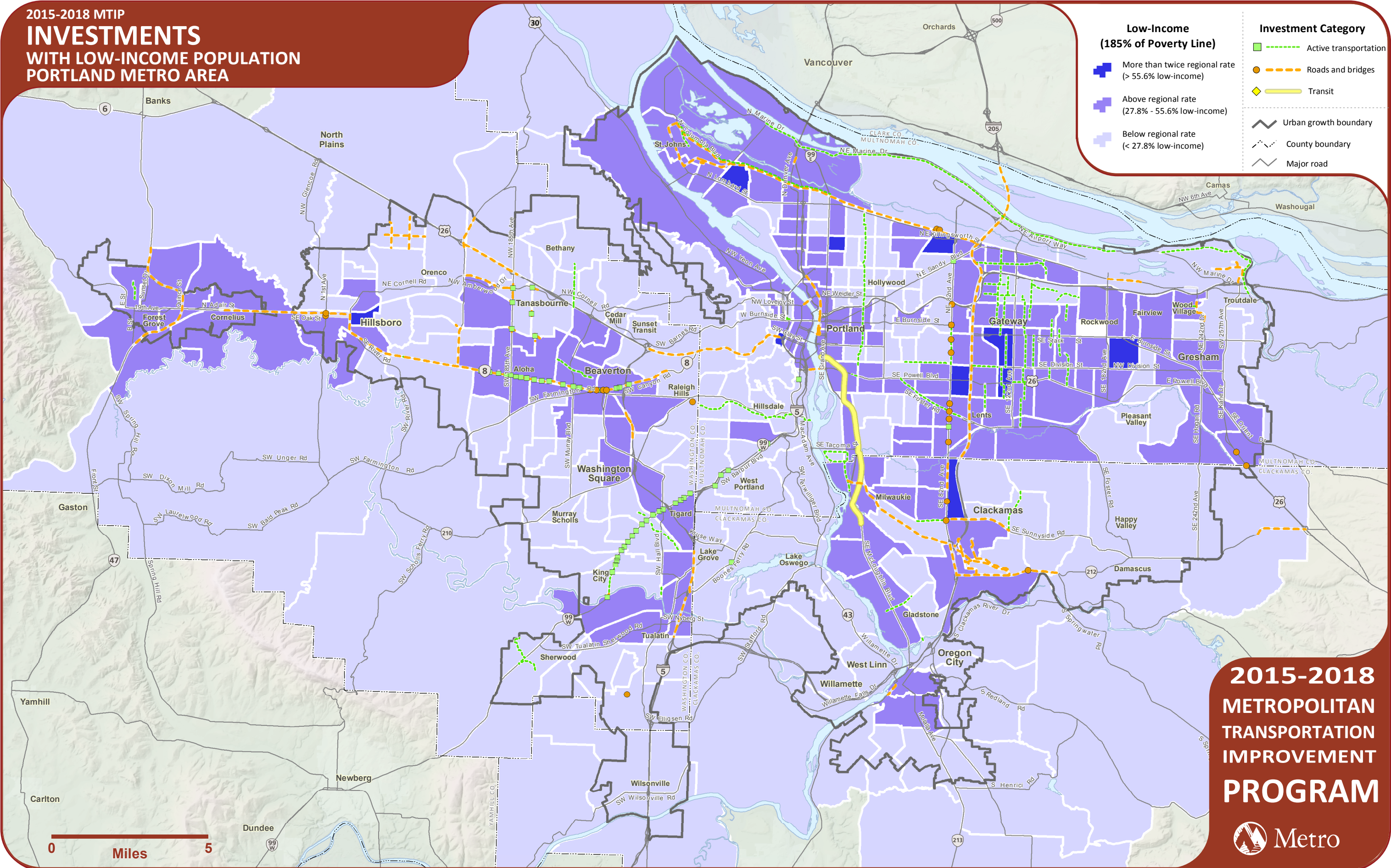


**2015-2018
METROPOLITAN
TRANSPORTATION
IMPROVEMENT
PROGRAM**



Data sources: U.S. Census, 2008-2012 American Community Survey, Table DP02 (census tract scale); 2011-2012 Oregon Department of Education. The limited English proficient population was comprised of individuals who spoke English "less than very well". Additional tracts were identified as strong likelihood of concentrated limited English proficiency population based on language spoken at home data from Oregon Department of Education. 2014 RTP and 2015-2018 MTIP Environmental Justice and Title VI Report. The nominating agency for the 2014 RTP as of January 2014. Programmatic projects including regional programs are not shown. Map saved 5/13/2014 at M:\plan\dr\projects\14022_EJ_TitleVI_2014\O_MXD\NEW_MXD\MTIP_LimitedEnglish.mxd

Figure 4.5



Data sources: U.S. Census Bureau, 2008-2012 American Community Survey, Table S1701 (census tract scale). The low-income population was comprised of individuals in households below 185% of federal poverty guidelines. Transportation investments shown are those which have an identified spatial element provided by the local nominating agency for the 2014 RTP as of January 2014. Programmatic projects including regional programs not shown.

As a reminder, the 2015-2018 MTIP analysis reflects the federal and state funding portions of the projects. Local match funding and other sources are not considered, which may reflect an overall greater total of investments. Additionally, the aggregate transportation investments in communities of concern reflect only those investments in the 2015-2018 MTIP which had enough spatial information to be mapped. Whereas the total regional transportation investment benchmark includes all 2015-2018 MTIP investments regardless of spatial information. (See Chapter 2 for more detail on the quantitative analysis methodology.)

Disproportionate Investment Analysis Results

Table 4-1 illustrates the 2015-2018 MTIP regionwide transportation investments per person per acre and for the entire population of the five communities of concern.

Table 4-1. 2015-2018 MTIP Transportation Investments Regionwide and in Entire Community of Concern Population

	Regional Total Investment	Young Persons Total Investment	Older Person Total Investment	People of Color Total Investment	Limited English Proficiency Total Investment	Low Income Total Investment
2015- 2018 MTIP	\$0.00087	\$0.00712	\$0.01049	\$0.00461	\$0.02372	\$0.00314

Because the 2015-2018 MTIP reflects four years of federal and state transportation investments, the total regional transportation investment per person per acre is understandably very small at less than 1/100th of a cent. Nonetheless, what is observed from the quantitative analysis is that each community of concern receives a greater amount of transportation investment than the rest of the region.

In looking further at the 2015-2018 MTIP transportation investments made in concentrated areas of communities of concern, as illustrated in Table 4-2, the quantitative analysis reinforces even in concentrated areas of communities of concern transportation investments levels are greater than the total regional investment.

Table 4-2. 2015-2018 MTIP Transportation Investments Regionwide and in Concentrated Areas of Communities of Concern

	Regional Total Investment	Total Community Investment in Areas of Concentrated Young Persons	Total Community Investment in Areas of Concentrated Older Persons	Total Community Investment in Areas of Concentrated People of Color	Total Community Investment in Areas of Limited English Proficiency Persons	Total Community Investment in Areas of Low Income Persons
2015- 2018 MTIP	\$0.00048	\$0.00217	\$0.00275	\$0.00853	\$0.00748	\$0.00643

Lastly, Table 4-3 illustrates the 2015-2018 MTIP investments by category for the region and within the entire populations of the five communities of concern. The quantitative analysis shows at a programmatic scale, across the three investment categories, the communities of concern receive greater investment than region.

Table 4-3. 2015-2018 MTIP Transportation Investments by Category for Region and Communities of Concern

	Regional Total Investment	Regional Young Person Total Investment	Regional Older Person Total Investment	Regional People of Color Total Investment	Regional Limited English Proficiency Person Total Investment	Regional Low Income Person Total Investment
Active Transportation	\$0.00004	\$0.00020	\$0.00027	\$0.00086	\$0.00059	\$0.00046
Roads and Bridges	\$0.00007	\$0.00033	\$0.00040	\$0.00133	\$0.00103	\$0.00100
Public Transit	\$0.00036	\$0.00165	\$0.00208	\$0.00634	\$0.00586	\$0.00497

Based on the quantitative analysis, the main result which resonates in the different breakdown of investments and in each community of concern, the 2015-2018 MTIP disproportionately overinvests in communities of concern.

Disparate Impact Analysis Results

The disparate impact analysis looks at the ratio of the region's total transportation investments to the total transportation investments for an entire community of concern. Table 4-4 illustrates the results of the ratio of transportation investment in communities of concern relative to the region.

Table 4-4. 2015-2018 MTIP Disparate Impact Analysis

Public Transit Investments – Regionwide Investments in Entire Community of Concern									
	Region	Young Person	DIA Ratio	Older Person	DIA Ratio	People of Color	DIA Ratio	Limited English Proficiency Person	DIA Ratio
2015- 2018 MTIP	\$0.00036	\$0.00165	4.58	\$0.00208	5.77	\$0.00634	17.6	\$0.00586	16.3
	Low Income	DIA Ratio							
2015- 2018 MTIP	\$0.00497	13.8							

The rates of 2015-2018 MTIP transit investment for each community of concern are above the regional rate for each community of concern.⁹ Again, these results reflect four years of federal and state capital investments in public transit as outlined by the Federal Transit Administration's Title VI guidance for what is required for the assessment. The analysis results do not reflect operating cost investments as public transit operating costs are funded through local investments.

⁹ As there is a higher rate of investment in each community of concern compared to the regional rate, Metro staff makes the determination that the quantitative analysis reveals no disparate impact. Due to concern about the proper metric against which to make future determinations (see footnote 7), Metro staff recommends additional refinement of assessment methodology to determine the proper comparative metrics for future assessments.

Chapter 5: Findings and Recommendations

This chapter provides an overview of the overall findings from the quantitative and qualitative analysis for the 2014 Regional Transportation Plan (RTP) and 2015-2018 Metropolitan Transportation Improvement Program Environmental Justice and Title VI assessment. The chapter also identifies the recommendations to emerge as a result of the findings.

Findings from the Quantitative and Qualitative Analysis

Having an understanding of the individual components of the analysis provides greater insight to the overall findings. As a result the key themes to emerge from the quantitative and qualitative analysis are addressed to frame the overall findings.

Quantitative Analysis Themes

The evaluation the region's package of short and long-term investments illustrate the planned transportation investments levels for five communities of concern throughout the region. While understanding the level of investment in communities of concern can illuminate inequities in investment distribution, feedback from stakeholders conveyed the importance of understanding context when determining burdens and benefits. In review of the quantitative analysis portion for the 2014 RTP and the 2015-2018 MTIP Environmental Justice and Title VI assessment (as detailed in Chapters 3 and 4) the following key themes emerged, which informed the qualitative assessment and overall findings. These quantitative findings do not reflect the overall findings for the disproportionate benefits and burdens assessment for the 2014 RTP and the 2015-2018 MTIP.

Quantitative analysis key themes:

- The region is not disinvesting in communities of concern.
- The region is investing in communities of concern at rates higher than the regional benchmark in each of the five communities in the short and long-term.
- When disaggregating investments by type (e.g. roadway, public transportation, and active transportation), the region investing in communities of concern at rates higher than the regional benchmark for the investment type in the short and long term.
- When looking at areas in the region where there is a high concentration of individual communities of concern, the region is investing at rates higher than the regional benchmark in the short and long term.

While the quantitative analysis is one component in assessing disproportionate benefits and burdens, the quantitative analysis was used as the main method in determining disparate impact as it pertains to public transportation investments. As summarized in greater detail in Chapters 3 and 4, the disparate impact results, showing investment ratios, are shown in Table 5-1.

Table 5-1: Disparate Impact Ratios for Communities of Concern for the 2014 RTP and the 2015-2018 MTIP

Public transportation investments (state and federal only)	Young Person DIA Ratio	Older Person DIA Ratio	People of Color DIA Ratio	Limited English Proficiency Person DIA Ratio	Low Income Person DIA Ratio
2014 RTP	2.51	3.41	11.0	9.12	13.6
2015-2018 MTIP	4.58	5.77	17.6	16.3	13.8

Based on the results of the disparate impact analysis, the quantitative finding can be made the region's state and federal public transportation investments do not show a disparate impact on communities of concern. The investment rate in all communities of concern is greater than a factor of between twice and seventeen times the regional rate.¹⁰ However, the overall findings towards disproportionate benefits and burdens need further qualitative assessment and disparate impact of public transportation investments may still be claimed and

¹⁰ As there is a higher rate of investment in each community of concern compared to the regional rate, Metro staff makes the determination that the quantitative analysis reveals no disparate impact. Due to concern about the proper metric against which to make future determinations (see footnote 7), Metro staff recommends additional refinement of assessment methodology to determine the proper comparative metrics for future assessments.

discovered through qualitative consideration.

Qualitative Analysis Themes

As previously mentioned, a qualitative analysis was conducted to reflect what was learned from stakeholder engagement that transportation investments come with both benefits and burdens and these benefits and burdens are dependent on the context for the individual persons or a community. As a result, an element of the 2014 RTP and 2015-2018 MTIP Environmental Justice and Title VI assessment focused on gathering qualitative information to inform how the rate of transportation investments ultimately affect communities of concern and help determine disproportionate burdens or benefits at a programmatic scale.

The qualitative analysis was initiated through the opening of a formal public comment period from May 16, 2014 through June 20, 2014. The comment period was advertised with a legal notice in placed in the Beaverton Valley Times, Gresham Outlook, Portland Observer, Portland Skanner, Asian Reporter and El Hispanic News. The advertisements had translated text stating the purpose of the notice and providing contact information for more information. Additionally, the public comment was advertised on Metro's newsfeed and emails were sent to Metro's planning enews list and individual community-based organizations, local jurisdiction staff, and other interested parties who were engaged in the definitions and thresholds work. Both the advertisements and the newsfeed directed the public to a web page providing copies of the draft 2014 RTP and 2015-2018 MTIP Environmental Justice and Title VI Assessment and to submit feedback through an online survey. To gather information about the programmatic benefits and burdens experienced by communities of concern from the region's short-term and the long-term transportation investments, the online public comment survey asked the following questions:

- 1) What are the potential benefits and burdens on communities of concern from investments in roads, transit, and active transportation?
- 2) Are there things we can do on a regional level (through policies or programs) to address, mitigate, and/or prevent the potential burdens from road, transit, and active transportation investments on communities of concern?

The public comment period received a total of 8 comments. The individual comments submitted can be found in Appendix D.

While the qualitative analysis information gathering was kicked off by the public comment period, every opportunity throughout the assessment process was used to gather qualitative information and ask about the different benefits and burdens which communities of concern experience with transportation investments.

Some additional opportunities where qualitative information was gathered included:

- TriMet Transit Equity Community Forums – Fall 2013
- Technical Definitions Survey for the 2014 RTP and 2015-2018 MTIP Environmental Justice and Title VI Assessment – January 2014
- Facilitated Discussion with Community-Based Organizations, Advocacy Organizations, and Public Health non-profits – April 2014
- Individual conversations with interested parties as requested.

Additionally, efforts were made to schedule discussions with community organizations serving one or more of the communities of concern. However, scheduling conflicts did not provide an opportunity to engage in the timeline of the public comment period. The organizations in which Metro staff tried to schedule include: Elders in Action, Meals on Wheels - Sherwood and Tigard (Formerly Loaves and Fishes), Portland State University's United Indian Students in Higher Education and Pacific Islanders Club, and Council Creek Community organizations.

Table 5-2 gives an overview of the main themes to emerge from the comment period and input received throughout the process of developing the assessment. Individual comments can be found in the public comment summary found in Appendix D.

Table 5-2. Qualitative Analysis Key Themes (in no particular order)

No.	Theme
1	Continue to support efforts that promote more mobility in communities of concern. Increase transportation investments in communities of concern, particularly investments which improve safety and provide more access to transit and active transportation.
2	The 2014 RTP and 2015-2018 MTIP Environmental Justice and Title VI assessment methodology, as a programmatic analysis, does not address appropriately the benefits and burdens communities of concern

	because: • The analysis does not account for operating investments in public transportation; • Uses a restrictive definition for defining persons with low-income; • Use of two different analysis to separate and satisfy requirements under Title VI and Executive Order 12898 is confusing and is a distinction without a real difference.
3	The 2014 RTP and 2015-2018 MTIP Environmental Justice and Title VI assessment methodology does not evaluate the outcomes and impacts of most interest to communities of concern. These outcomes and impacts include: • improved accessibility and mobility to work and amenities (particularly pertaining to transit service) that the communities of concern frequent; • potential for and reduction to market-driven displacement (allowing communities of concern the opportunity to reap the benefits of place-based public investment); • reduced housing and transportation cost-burden (for owners and renters) for communities of concern; • improved safety (particularly in the form of active transportation infrastructure for safer walking environments); • improved public health.
4	The current methodology of the 2014 RTP and 2015-2018 MTIP Environmental Justice and Title VI assessment methodology does not appropriately evaluate and address disparate impact, particularly the use of the four-fifths (4/5th) rule is inadequate [see footnote 7; also refer to the public review draft of this document].
5	The purpose and intent of the 2014 RTP and 2015-2018 MTIP Environmental Justice and Title VI assessment is unclear and inaccessible to communicate, particular to communities of concern, which ultimately hinders gathering meaningful input from these communities.
6	The 2014 RTP and 2015-2018 MTIP Environmental Justice and Title VI assessment should be conducted at a project-by-project level, rather than programmatically, to identify incremental burdens and identify strategies for addressing the burdens caused by individual projects on communities of concern.
7	Metro transportation programs should clearly outline how its funding processes will prioritize funding decisions based on findings of this and future environmental justice and Title VI assessments.
8	Public engagement with communities of concern, early, often, and continually is critical to building trusting relationships and ensure public policy and recommendations align with community vision and needs.

In assessing the public comments and feedback received, the following are the key themes from the qualitative analysis:

- The 2014 RTP and 2015-2018 MTIP Environmental Justice and Title VI assessment quantitative methodology is dissatisfying to many stakeholders for multiple reasons, but some of which include:
 - o The methodology, as a programmatic analysis, does not address burdens contributed by individual transportation investments (in the form of projects) and therefore is not appropriately considering burdens and benefits.
 - o Technical methods for evaluation are not adequately identifying and utilizing metrics which address issues meaningful to communities of concern including accessibility, safety, and market-driven displacement.
 - o The methodology treats disparate impact and disproportionate burden differently when arguably the methodology can treat them the same.
 - o The methodology employed for disparate impact analysis is inadequate and inappropriate as it presents a high margin of error for discrimination.
- There was support for higher level of transportation investments in communities of concern, particularly those investments which focus on transit and active transportation
- Public engagement is imperative to conducting a satisfying environmental justice and Title VI assessment. Public engagement is necessary for understanding communities of concerns needs and burdens experienced, as well as the metrics for evaluating those burdens.
- Communication around the assessment methodology needs to be simplified and more transparent on what the resulting outcomes will be from the assessment results.
- There was some dissent on whether the 2014 RTP and 2015-2018 MTIP Environmental Justice and Title VI assessment is compliant with the federal mandates.
- There were arguments made regarding the value of a programmatic analysis and advocated for future analyses to be conducted at the project scale and for all Metro related transportation planning and

programming processes.

Findings for the 2014 RTP and the 2015-2018 MTIP Disproportionate Benefits and Burdens and Disparate Impact Analyses for Meeting Federal Regulations

For the purposes of demonstrating the 2014 RTP and the 2015-2018 MTIP Environmental Justice and Title VI assessment complies with federal regulations, Table 5-4 illustrates the formal findings.

Table 5-4. Formal Findings for Meeting Federal Title VI and Environmental Justice Requirements

Regulatory Framework	Regulatory Analytical Requirement	Finding
Title VI of the Civil Rights Act of 1964	Disparate impact analysis of state and federal public transportation funding in aggregate	Analysis of the transportation investments in the financially constrained 2014 RTP and the 2015-2018 MTIP do not demonstrate a quantifiable programmatic disparate impact of public transportation funds on five indentified communities of concern (people of color, people with limited English proficiency, people with low-income, older adults, and young people)
Executive Order 12898 on Environmental Justice	Benefits and burdens analysis	Analysis of the transportation investments in the financially constrained 2014 RTP and the 2015-2018 MTIP do not demonstrate a quantifiable programmatic disproportionate burden on people of color, people with limited English proficiency, people with low-income, older adults, and young people; but further information qualitative information can illuminate the benefits and burdens that these investments present to communities of concern from the perspective of these communities.

Overall Findings for the 2014 RTP and 2015-2018 MTIP Environmental Justice and Title VI Assessment

Based on what was learned from the quantitative and qualitative findings, the following are the overall findings for the 2014 RTP and 2015-2018 MTIP Environmental Justice and Title VI Assessment.

- Evaluating disproportionate burdens and disparate impact continues to be a work-in-progress assessment which needs further study to prepare for the development of the 2019-2022 MTIP and the 2018 RTP. Some areas of further study include, but not limited to:
 - Definitions of communities of concern
 - A hybrid disproportionate benefits and burdens-disparate impact methodology
 - New and/or revised evaluation metrics for the analysis
- Qualitative information and input should be collected throughout the process from the early stages of development to help inform the methodology and metrics used in evaluation as well as receive feedback on the analysis results.
- There are challenges in communicating, distinguishing, and addressing the differences in Metro's obligations to evaluate benefits and burdens as well as disparate impact at a programmatic scale than the obligations of the region's partners to be compliant with environmental justice and Title VI regulations at a project scale.
- There are challenges in communicating and distinguishing the difference in Metro's effort to meet federal obligations (Executive Order on Environmental Justice and Title VI of the Civil Rights Act) and Metro's efforts pertaining to equity.
- The region is investing in communities of concern at rates higher than the regional benchmark and is not under investing in communities of concern.
- The assessment does not show a quantifiable programmatic disparate impact from 2014 RTP and the 2015-18 MTIP investments on any of the five communities of concern.
- Quantifiable or qualitative programmatic findings of disproportionate burden and disparate impact were not revealed by the analysis for the 2014 RTP and the 2015-2018 MTIP.

Recommendations

Conducting the assessment and feedback received through public comment illuminated areas that need further improvement and refinement prior to conducting the Environmental Justice and Title VI assessment for the update of the next RTP and MTIP. Therefore, staff is making a set of recommendations address the refinements areas. The following is a condensed list of the staff recommendations organized by topic area. Further detail of

the recommendations can be found in Chapter 5 of Exhibit A. Some of these recommendations may require additional resources or a shift in the current use of resources.

Long-Range Transportation Planning and Programming Recommendations

- Work with agency partners in the region to clarify roles and responsibilities in complying with civil rights regulations in delivering transportation infrastructure and services.
 - Work with agency partners in the region, Metro equity strategy staff and other interested community parties to define, budget and schedule the following work program objectives: for consideration in the annual UPWP process.
 - o Develop innovative and robust methods to identify the transportation needs of communities of concern as an early task in the 2018 RTP update process to inform the project solicitation and evaluation phases of the update.
 - o Conduct a regional transportation infrastructure gaps analysis relative to the location of communities of concern. This analysis would build from efforts recently conducted at Metro and throughout the region.
 - o As an early task of the 2018 RTP update, develop an updated system performance measure for the Regional Transportation Plan keyed to communities of concern and the transportation issues most important to them, within data and technical limitations.
 - o Identify more specific metrics pertaining to equity for consideration in the nomination and evaluation of projects to the 2018 RTP and 2018-2021 MTIP.
 - o Provide greater clarity on what is expected of applicants in project nomination materials related to how environmental justice and Title VI was considered in the nominated project(s). The information would be provided as direction for project nomination processes for the RTP and the regional flexible fund allocation process.
 - o During the 2018 RTP update process, assess and proactively consider levels of investment in concentrated communities of youth relative to the remaining population.

Technical Analysis Recommendations

- Further refine the methodology for conducting environmental justice and Title VI programmatic analysis to consider new or additional measures of impact or burden in addition to the level of transportation investment metric. These new or additional measures would be identified from public engagement. Some potential areas of focus include:
 - o Investigate different quantitative and qualitative methodologies for evaluating programmatic disproportionate burden and disparate impact.
 - o Investigate the ability to disaggregate data sets to consider potential impacts at a more refined scale.
 - o Identify metrics that holistically address the transportation concerns of communities of concern and use these metrics in evaluating regional plans and programming. These may include improved mobility and access, safety, and others identified through public comment.
- Consider methods to assess all transportation funds included in the MTIP for the Title VI and environmental justice evaluation; the current assessment includes federal and state, but not local and other sources.
- Investigate different methods for evaluating disparate impact and disproportionate benefits and burdens. Look at opportunities to potentially streamline and combine the methods.

Communications and Public Involvement Recommendations

- Develop a performance measure or goal for public involvement participation tailored to Metro's efforts in planning (e.g., RTP, MTIP) or project development (e.g. Southwest Corridor Plan), which could be offered as best practices for local jurisdiction transportation system planning and project development processes.
- Continue to refine and develop the communications strategy for regional transportation planning and programming which communicates clearly, simply, and effectively with communities of concern. Some potential communications areas include
 - o Simplified and accessible messaging to communities of concern which describe Metro's federal obligations (under Executive Order 12898 and Title VI of the Civil Rights Act) at a programmatic level and the obligations of local partners (under Executive Order 12898 and Title VI of the Civil Rights Act) at the individual project level.
 - o Simplified and accessible messaging to communities of concern distinguishing the difference in Metro's effort to meet federal obligations (Executive Order on Environmental Justice and Title VI of the Civil Rights Act) and Metro's efforts pertaining to equity.

- Continue to utilize innovative opportunities to engage with communities of concern.

Transportation Planning Coordination with Metro's Equity Strategy Recommendations

- Refine metrics for identifying communities of concern in coordination with the Metro Equity Strategy to create consistency across the agency.
- Participate and engage with Metro's Equity Strategy technical advisory committee to consider and align the community identified indicators with potential and/or commonly used transportation indicators; this effort may require additional or shift in resources.
- Use Metro's Equity Strategy relational mapping work to define how the update of the RTP and development of the MTIP can advance the implementation of the equity strategy.
- Use Metro's Equity Strategy relational mapping as a framework to help define the environmental justice and Title VI work programs.

For the purposes of understanding how the different quantitative, qualitative, and overall findings correlate to staff recommendations, Table 5-5 creates a crosswalk to illustrate the connection and influences of the findings to the recommendations. To note, only those findings which have a corresponding recommendation are identified in the crosswalk and several findings have a one-to-many relationship.

Table 5-5. 2014 RTP and 2015 MTIP Environmental Justice and Title VI Assessment Findings and Corresponding Recommendations

Overall Finding	Corresponding Recommendation(s) to Address Finding
Evaluating disproportionate burdens and disparate impact continues to be a work-in-progress assessment which needs further study to prepare for the development of the 2018-2021 MTIP and the 2018 RTP. Some areas of further study include, but not limited to: - o Definitions of communities of concern - o A hybrid disproportionate benefits and burdens-disparate impact methodology - o New and or revised evaluation metrics for the analysis	Develop innovative and robust methods to identify the transportation needs of communities of concern as an early task in the 2018 RTP update process to inform the project solicitation and evaluation phases of the update. Further refine the methodology for conducting environmental justice and Title VI programmatic analysis to consider new or additional measures of impact or burden than the level of investment and qualitative identification from public comment. Some potential areas of focus include: • Investigate which datasets have the ability to be disaggregated and evaluated in a disaggregated method • Investigate different quantitative and qualitative methodologies for evaluating programmatic disproportionate burden and disparate impact • Identify metrics which more holistically address the transportation concerns of communities of concern and use these metrics in evaluating regional plans and programming Identify more specific equity metrics for consideration in the nomination and evaluation of projects to the 2018 RTP and 2018-2021 MTIP; this effort may require a shift in resources to conduct community engagement to better identify the needs of communities of concern. Investigate different methods for evaluating disparate impact and disproportionate benefits and burdens. Look at opportunities to potentially streamline and combine the methods; this effort may require additional or a shift in resources.

	Refine metrics for identifying communities of concern in coordination with the Metro Equity Strategy to create consistency across the agency. Participate and engage with Metro's Equity Strategy technical advisory committee to consider and align the community identified indicators with potential and/or commonly used transportation indicators; this effort may require additional or shift in resources Use Metro's Equity Strategy relational mapping work to define how the update of the RTP and development of the MTIP can advance the implementation of the equity strategy; this effort may require additional or a shift in resources
Qualitative information and input should be collected throughout the process from the early stages of development to help inform the methodology and metrics used in evaluation as well as receive feedback on the analysis results.	Develop innovative and robust methods to identify the transportation needs of communities of concern as an early task in the 2018 RTP update process to inform the project solicitation and evaluation phases of the update; implementation of the methods may require additional or a shift in resources. Identify more specific equity metrics for consideration in the nomination and evaluation of projects to the 2018 RTP and 2018-2021 MTIP; this effort may require a shift in resources to conduct community engagement to better identify the needs of communities of concern. Develop a performance measure or goal for public involvement participation tailored to Metro's efforts in planning (e.g., RTP, MTIP) or project development (e.g. Southwest Corridor Plan), which could be offered as best practices for local jurisdiction transportation system planning and project development processes; meeting this measure may require a shift in planning resources. Continue to utilize innovative opportunities to engage with communities of concern.
There are challenges in communicating, distinguishing, and addressing the differences in Metro's obligations to evaluate benefits and burdens as well as disparate impact at a programmatic scale than the obligations of the region's partners to be compliant with environmental justice and Title VI regulations at a project scale.	Continue to refine and develop the communications strategy for regional transportation planning and programming which communicates clearly, simply, and effectively with communities of concern. Some potential communications areas include • Simplified and accessible messaging to communities of concern which describe Metro's federal obligations (under Executive Order 12898 and Title VI of the Civil Rights Act) at a programmatic level and the obligations of local partners (under Executive Order 12898 and Title VI of the Civil Rights Act) at the individual project level. • Simplified and accessible messaging to communities of concern distinguishing the difference in Metro's effort to meet federal

	obligations (Executive Order on Environmental Justice and Title VI of the Civil Rights Act) and Metro's efforts pertaining to equity.
There are challenges in communicating and distinguishing the difference in Metro's effort to meet federal obligations (Executive Order on Environmental Justice and Title VI of the Civil Rights Act) and Metro's efforts pertaining to equity.	Continue to refine and develop the communications strategy for regional transportation planning and programming which communicates clearly, simply, and effectively with communities of concern. Some potential communications areas include • Simplified and accessible messaging to communities of concern which describe Metro's federal obligations (under Executive Order 12898 and Title VI of the Civil Rights Act) at a programmatic level and the obligations of local partners (under Executive Order 12898 and Title VI of the Civil Rights Act) at the individual project level. • Simplified and accessible messaging to communities of concern distinguishing the difference in Metro's effort to meet federal obligations (Executive Order on Environmental Justice and Title VI of the Civil Rights Act) and Metro's efforts pertaining to equity.
Quantifiable or qualitative programmatic findings of disproportionate burden and disparate impact were not revealed by the analysis for the 2014 RTP and the 2015-2018 MTIP.	N/A

Appendix A: 2014 Regional Transportation Plan Financially Constrained Projects Included in the Analysis

2014 Regional Transportation Plan Financially Constrained Projects Included in the Analysis (organized by alphabetically by nominating agency)

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
10617	Beaverton	Farmington Rd.	\$ 10,700,000	2014-2017	Active Transportation
10628	Beaverton	Center Street and 113th Ave. safety, bike, and pedestrian improvements	\$ 5,800,000	2014-2017	Active Transportation
10631	Beaverton	141st/142nd/144th multimodal street extension connections	\$ 6,700,000	2014-2017	Active Transportation
10634	Beaverton	Cedar Hills Blvd. safety, bicycle and pedestrian improvements	\$ 19,000,000	2018-2024	Active Transportation
10636	Beaverton	Millikan Way safety, bike and pedestrian improvements	\$ 2,600,000	2018-2024	Active Transportation
10637	Beaverton	Millikan Way safety, bicycle and pedestrian improvements and 4/5 lanes from Murray to 141st	\$ 17,100,000	2018-2024	Active Transportation
10639	Beaverton	Weir Rd. safety, bicycle and pedestrian improvements	\$ 4,100,000	2014-2017	Active Transportation
10644	Beaverton	110th Ave. sidewalk gaps	\$ 1,400,000	2018-2024	Active Transportation
10646	Beaverton	Hall Blvd. / Watson Ave. pedestrian improvements	\$ 2,400,000	2014-2017	Active Transportation
10648	Beaverton	Denney Rd. sidewalks	\$ 2,200,000	2025-2032	Active Transportation
10649	Beaverton	Allen Blvd sidewalks	\$ 200,000	2018-2024	Active Transportation
10654	Beaverton	Nora Road sidewalks and bike lanes	\$ 2,000,000	2018-2024	Active Transportation
10656	Beaverton	Jamieson Rd. sidewalks	\$ 1,100,000	2018-2024	Active Transportation
10661	Beaverton	155th Ave. sidewalks	\$ 2,700,000	2014-2017	Active Transportation
10662	Beaverton	155th Ave. sidewalks	\$ 1,800,000	2014-2017	Active Transportation
10663	Beaverton	Hall Blvd. bike lanes & turn lanes to Cedar Hills	\$ 5,200,000	2018-2024	Active Transportation
10664	Beaverton	Watson Ave. bike lanes	\$ 4,500,000	2018-2024	Active Transportation
10665	Beaverton	6th Ave. bike lanes	\$ 3,600,000	2018-2024	Active Transportation
10666	Beaverton	Greenway Dr. bike lanes	\$ 3,700,000	2018-2024	Active Transportation

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
10667	Beaverton	155th Ave. bike lanes	\$ 5,400,000	2018-2024	Active Transportation
10668	Beaverton	Farmington Rd Bike lane retrofit	\$ 12,600,000	2018-2024	Active Transportation
10669	Beaverton	Hall Blvd. bike lanes & turn lanes	\$ 5,200,000	2018-2024	Active Transportation
10670	Beaverton	Denney Rd. bike lanes	\$ 6,100,000	2018-2024	Active Transportation
10671	Beaverton	Allen Blvd. bike lanes	\$ 4,300,000	2018-2024	Active Transportation
10672	Beaverton	Western Ave. bike lanes	\$ 5,600,000	2018-2024	Active Transportation
10616	Beaverton	Rose Biggi Ave.: Crescent Street to Hall Blvd.	\$ 3,500,000	2014-2017	Roads and Bridges
10618	Beaverton	Dawson/Westgate multimodal extension from Rose Biggi Ave. to Hocken Ave.	\$ 8,900,000	2014-2017	Roads and Bridges
10619	Beaverton	Crescent St. multimodal extension to Cedar Hills Blvd.	\$ 3,500,000	2014-2017	Roads and Bridges
10620	Beaverton	Millikan Way multimodal extension from Watson Ave. to 114th Ave.	\$ 13,800,000	2018-2024	Roads and Bridges
10621	Beaverton	New street connection from Broadway to 115th Ave.	\$ 4,500,000	2018-2024	Roads and Bridges
10622	Beaverton	Electric to Whitney to Carousel to 144th multimodal street connections	\$ 7,200,000	2018-2024	Roads and Bridges
10623	Beaverton	Hall Blvd. multimodal street extension to Jenkins Rd.	\$ 14,400,000	2025-2032	Roads and Bridges
10624	Beaverton	120th Ave.: new 2 lane multimodal street	\$ 8,900,000	2018-2024	Roads and Bridges
10625	Beaverton	Rose Biggi Ave.: 2 lane multimodal street extension	\$ 3,000,000	2014-2017	Roads and Bridges
10626	Beaverton	114th Ave./115th Ave. 2 lane multimodal street	\$ 10,000,000	2014-2017	Roads and Bridges
10627	Beaverton	Tualaway 2 lane multimodal street extension	\$ 3,900,000	2018-2024	Roads and Bridges
10629	Beaverton	Hocken Ave. multimodal improvements	\$ 1,600,000	2018-2024	Roads and Bridges
10630	Beaverton	Hall Blvd. multimodal extension from Cedar Hills Blvd. to Hocken Ave.	\$ 5,500,000	2014-2017	Roads and Bridges
10633	Beaverton	Allen Blvd. safety, bicycle and pedestrian improvements	\$ 6,300,000	2018-2024	Roads and Bridges

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
10635	Beaverton	125th Ave. multimodal extension Brockman to Hall Blvd.	\$ 13,900,000	2014-2017	Roads and Bridges
10638	Beaverton	Davies Rd. multimodal street extension	\$ 4,900,000	2014-2017	Roads and Bridges
10653	Beaverton	Sexton Mountain Drive multimodal street extension from 155th Ave. to Sexton Mtn. across the Powerli	\$ 2,500,000	2018-2024	Roads and Bridges
11379	Beaverton	Canyon Road Safety and Complete Corridor Project	\$ 16,087,977	2014-2017	Roads and Bridges
10642	Beaverton	Adaptive Traffic Signal Systems	\$ 10,000,000	2018-2024	TSMO/TDM
10003	Clackamas County	Harmony Road Improvements	\$ 20,000,000	2018-2024	Active Transportation
10009	Clackamas County	Fuller Rd. Improvements	\$ 4,000,000	2033-2040	Active Transportation
10014	Clackamas County	82nd Ave. Multi-Modal Improvements	\$ 13,600,000	2018-2024	Active Transportation
10019	Clackamas County	Multi-use Path connection to NC Aquatic Park	\$ 2,000,000	2014 - 201	Active Transportation
10022	Clackamas County	82nd Dr.	\$ 660,000	2018-2024	Active Transportation
10024	Clackamas County	McLoughlin Blvd. Improvement	\$ 42,600,000	2014-2017	Active Transportation
10050	Clackamas County	Johnson Rd., Clackamas Rd., McKinley Rd.	\$ 1,800,000	2025-2032	Active Transportation
11347	Clackamas County	Sunrise Multi- use path (Sunrise JTA)	\$ 6,000,000	2014-2017	Active Transportation
11491	Clackamas County	Flavel Dr	\$ 2,410,000	2014-2017	Active Transportation
11494	Clackamas County	Monroe St	\$ 7,470,000	2014-2017	Active Transportation
11496	Clackamas County	Park Ave	\$ 1,750,000	2014-2017	Active Transportation
11499	Clackamas County	River Rd	\$ 4,760,000	2025 - 203	Active Transportation
11500	Clackamas County	River Rd	\$ 5,570,000	2025-2032	Active Transportation
11501	Clackamas County	Concord Rd	\$ 7,230,000	2025-2032	Active Transportation
11504	Clackamas County	Oak Grove Blvd	\$ 2,520,000	2025-2032	Active Transportation
11505	Clackamas County	Hull Ave	\$ 4,130,000	2025-2032	Active Transportation
11506	Clackamas County	Clackamas Rd	\$ 3,420,000	2025-2032	Active Transportation

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
11518	Clackamas County	Webster Rd	\$ 19,010,000	2033-2040	Active Transportation
11507	Clackamas County	Roots Rd	\$ 4,720,000	2025-2032	Active Transportation
11519	Clackamas County	Thiessen Rd	\$ 23,830,000	2033-2040	Active Transportation
11508	Clackamas County	Hubbard Rd	\$ 1,650,000	2025-2032	Active Transportation
11509	Clackamas County	Lake Rd	\$ 5,530,000	2025-2032	Active Transportation
11511	Clackamas County	Stevens Rd / Stevens Way	\$ 4,620,000	2025-2032	Active Transportation
11516	Clackamas County	Evelyn St / Mangan Dr	\$ 50,000	2025-2032	Active Transportation
11520	Clackamas County	Courtney Ave	\$ 1,860,000	2033 - 2040	Active Transportation
11521	Clackamas County	132nd Ave	\$ 1,680,000	2033 - 2040	Active Transportation
11524	Clackamas County	Monroe St	\$ 5,330,000	2033 - 2040	Active Transportation
11525	Clackamas County	Courtney Ave	\$ 5,010,000	2033 - 2040	Active Transportation
11526	Clackamas County	Harold Ave	\$ 3,310,000	2033 - 2040	Active Transportation
11527	Clackamas County	Johnson Creek Blvd	\$ 1,400,000	2033 - 2040	Active Transportation
11668	Clackamas County	Sunrise Multi- use path	\$ 6,000,000	2018-2024	Active Transportation
11495	Clackamas County	I-205 Ped / Bike Overpass	\$ 4,780,000	2014-2017	Active Transportation
11132	Clackamas County	Clackamas Industrial area multi-modal improvements	\$ 5,000,000	2017-2024	Active Transportation
10017	Clackamas County	Clackamas Regional Center Bike/Pedestrian Corridors	\$ 5,775,000	2018-2024	Active Transportation
10042	Clackamas County	Lawnfield realignment (Sunrise JTA)	\$ 25,650,000	2014-2017	Roads and Bridges
10002	Clackamas County	Johnson Creek Blvd. Improvements	\$ 13,770,000	2018-2024	Roads and Bridges
10004	Clackamas County	Otty Rd. Improvements	\$ 7,340,000	2018-2024	Roads and Bridges
10005	Clackamas County	West Monterey Extension	\$ 6,200,000	2014-2017	Roads and Bridges
10011	Clackamas County	122nd/Hubbard/135th Improvement	\$ 1,840,000	2018-2024	Roads and Bridges
10013	Clackamas County	Boyer Dr. Extension	\$ 3,700,000	2018-2024	Roads and Bridges

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
10018	Clackamas County	82nd Ave. Blvd. Design Improvements	\$ 5,400,000	2014 - 201	Roads and Bridges
10029	Clackamas County	Stafford Rd Improvements	\$ 8,400,000	2018-2024	Roads and Bridges
10052	Clackamas County	Tolbert Road (Sunrise JTA)	\$ 17,500,000	2014-2017	Roads and Bridges
10102	Clackamas County	Linwood Ave	\$ 11,020,000	2025-2032	Roads and Bridges
10136	Clackamas County	Kellogg Creek (Oatfield Rd.) Bridge Replacement	\$ 4,702,881	2033-2040	Roads and Bridges
10157	Clackamas County	Carver (Springwater Rd.) Bridge	\$ 23,600,000	2014-2017	Roads and Bridges
11497	Clackamas County	I-205	\$ 10,000,000	2018-2024	Roads and Bridges
11502	Clackamas County	Concord Rd	\$ 570,000	2025-2032	Roads and Bridges
11503	Clackamas County	Jennings Ave	\$ 13,870,000	2025-2032	Roads and Bridges
11517	Clackamas County	Jennings Ave	\$ 13,340,000	2033-2040	Roads and Bridges
11512	Clackamas County	Clatsop St / Luther Rd	\$ 7,920,000	2025-2032	Roads and Bridges
11513	Clackamas County	Mather Rd	\$ 6,420,000	2025-2032	Roads and Bridges
11515	Clackamas County	Sunnyside Rd	\$ 3,000,000	2025-2032	Roads and Bridges
11522	Clackamas County	97th Ave / Mather Rd	\$ 4,560,000	2033 - 2040	Roads and Bridges
11523	Clackamas County	Rosemont Rd	\$ 8,570,000	2033 - 2040	Roads and Bridges
10001	Clackamas County	Johnson Creek Blvd. Interchange Improvements	\$ 9,800,000	2025-2032	Roads and Bridges
10054	Clackamas County	Oatfield Rd.	\$ 1,358,150	2014-2017	Roads and Bridges
10055	Clackamas County	Oatfield Rd.	\$ 1,653,700	2025-2032	Roads and Bridges
10056	Clackamas County	Oatfield Rd.	\$ 1,043,510	2025-2032	Roads and Bridges
10064	Clackamas County	Webster Rd.	\$ 3,722,090	2018-2024	Roads and Bridges
10066	Clackamas County	92nd/Johnson Creek Blvd. intersection	\$ 1,000,000	2014-2017	Roads and Bridges
10000	Clackamas County	Linwood/Harmony Rd./ Lake Rd. Intersection	\$ 20,000,000	2025-2032	Roads and Bridges
10063	Clackamas County	Thiessen Rd.	\$ 1,248,210	2033-2040	Roads and Bridges

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
11492	Clackamas County	Sunnyside Rd	\$ 2,000,000	2014-2017	Roads and Bridges
11498	Clackamas County	Harmony Rd / Sunnyside Rd	\$ 1,250,000	2025 - 203	Roads and Bridges
11493	Clackamas County	Otty St	\$ 1,600,000	2014-2017	Roads and Bridges
11514	Clackamas County	Strawberry Ln	\$ 490,000	2025-2032	Roads and Bridges
11510	Clackamas County	Sunnybrook Blvd	\$ 290,000	2025-2032	Roads and Bridges
11528	Clackamas County	Transportation Safety Action Plan Program	\$ 17,700,000	2014-2040	Roads and Bridges
10065	Clackamas County	Webster Rd.	\$ 1,102,850	2033-2040	TSMO/TDM
10020	Clackamas County	Clackamas County ITS Plan	\$ 21,300,000	2014-2040	TSMO/TDM
10085	Clackamas County and Lake Oswego	Lake Oswego Milwaukie Bike Ped Bridge Over the Willamette River	\$ 10,130,000	2033-2040	Active Transportation
10805	Cornelius	TV Hwy Ped Infill	\$ 2,567,952	2025-2032	Active Transportation
11095	Cornelius	17th Avenue	\$ 349,564	2018-2024	Active Transportation
11246	Cornelius	Cornelius Citywide Sidewalk Infill	\$ 1,466,273	2033-2040	Active Transportation
11249	Cornelius	19th/20th Avenue	\$ 4,651,458	2025-2032	Active Transportation
10804	Cornelius	Collector Bike Lanes	\$ 305,568	2018-2024	Active Transportation
10788	Cornelius	10th Ave	\$ 5,300,000	2014-2017	Roads and Bridges
10795	Cornelius	Holladay St Extension	\$ 2,500,000	2018-2024	Roads and Bridges
10796	Cornelius	Holladay St Extension	\$ 3,022,306	2033-2040	Roads and Bridges
10797	Cornelius	Holladay St Extension	\$ 3,221,579	2033-2040	Roads and Bridges
10798	Cornelius	Davis St. Extension	\$ 3,885,822	2033-2040	Roads and Bridges
10799	Cornelius	Davis St. Extension	\$ 9,905,382	2033-2040	Roads and Bridges
11245	Cornelius	Davis St.	\$ 3,106,663	2033-2040	Roads and Bridges
11251	Cornelius	29th Ave	\$ 4,234,436	2033-2040	Roads and Bridges
10802	Cornelius	29th Ave	\$ 600,000	2033-2040	Roads and Bridges
10807	Cornelius	Park & Ride	\$ 1,700,000	2033-2040	Transit
10078	Damascus	OR 224	\$ 41,500,000	2025-	Roads and Bridges

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
				2032	
10035	Damascus	Foster Rd. Improvements	\$ 5,900,000	2033-2040	Roads and Bridges
10033	Damascus Happy Valley	172nd Ave - 190th Connector - adopted alignment	\$ 37,480,000	2018-2024	Roads and Bridges
10138	Damascus Happy Valley	Hwy 212 widening to 5 lane boulevard	\$ 30,000,000	2018-2024	Roads and Bridges
10076	Damascus Happy Valley	SE Sunnyside Rd East Extension	\$ 15,000,000	2025-2032	Roads and Bridges
10781	Forest Grove	West UGB Trail	\$ 4,270,000	2018-2024	Active Transportation
10784	Forest Grove	David Hill Trail	\$ 5,910,000	2018-2024	Active Transportation
10806	Forest Grove	Council Creek Regional Trail	\$ 5,200,000	2018-2024	Active Transportation
10779	Forest Grove	Hwy 8/Pacific/19th	\$ 9,630,000	2018-2024	Active Transportation
10782	Forest Grove	Thatcher (Gales Ck-David Hill), Willamina (Gales Ck-Sunset), B Street (26th-Willamina) Ped and Bike	\$ 4,470,000	2014-2017	Active Transportation
10780	Forest Grove	Hwy 47/ Pacific Avenue Intersection Improvements	\$ 4,100,000	2014-2017	Roads and Bridges
10773	Forest Grove	Thatcher Road Realignment	\$ 3,710,000	2014-2017	Roads and Bridges
10778	Forest Grove	Heather Industrial Connector	\$ 4,930,000	2018-2024	Roads and Bridges
10775	Forest Grove	E Street/Pacific Avenue-19th Avenue Intersection	\$ 4,940,000	2018-2024	Roads and Bridges
10774	Forest Grove	23rd Avenue Extension	\$ 15,424,000	2025-2032	Roads and Bridges
11606	Forest Grove	26th Avenue Improvements & Extension	\$ 9,800,000	2025-2032	Roads and Bridges
11605	Forest Grove	Taylor Way Extension	\$ 7,840,000	2025-2032	Roads and Bridges
11672	Forest Grove	Holladay Ext (west)	\$ 12,080,000	2025-2032	Roads and Bridges
10773	Forest Grove	Thatcher Road Realignment	\$ 3,710,000	2014-2017	Roads and Bridges
10780	Forest Grove	Hwy 47/ Pacific Avenue Intersection Improvements	\$ 4,100,000	2014-2017	Roads and Bridges
11380	Forest Grove	Yew St / Adair St Intersection Improvements	\$ 1,390,000	2014-2017	Roads and Bridges
11661	Forest	Hwy 47/ Martin Road	\$ 4,230,000	2018-	Roads and Bridges

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
	Grove	Intersection Improvements		2024	
11662	Forest Grove	Hwy 47/ B St. Intersection Improvements	\$ 1,790,000	2014-2017	Roads and Bridges
11663	Forest Grove	Hwy 47/ Purdin Rd. Intersection Improvements	\$ 3,320,000	2025-2032	Roads and Bridges
10771	Forest Grove	High Capacity Transit: Blue Line west : Hwy. 8 extension	\$ 2,290,000	2025-2032	Transit
10069	Gresham	East Buttes Powerline Trail	\$ 1,900,000	2018-2024	Active Transportation
10429	Gresham	Powell Valley Imps.	\$ 14,645,408	2018-2024	Active Transportation
10436	Gresham	Max Trail	\$ 2,500,000	2014-2017	Active Transportation
10437	Gresham	Gresham/Fairview Trail	\$ 4,608,799	2018-2024	Active Transportation
10438	Gresham	Springwater Trail Connections	\$ 271,562	2018-2024	Active Transportation
10440	Gresham	Division St. Multimodal Improvements	\$ 4,939,693	2018-2024	Active Transportation
10459	Gresham	Burnside SC Pedestrian Imps.	\$ 1,192,669	2018-2024	Active Transportation
10504	Gresham	Ped to Max: Hood St.	\$ 986,467	2018-2024	Active Transportation
10519	Gresham	Pedestrian enhancements	\$ 75,492	2018-2024	Active Transportation
10544	Gresham	Butler Rd. Bike and Ped Improvements	\$ 5,705,413	2025-2032	Active Transportation
10441	Gresham	Gresham RC Ped and Ped to Max	\$ 584,820	2018-2024	Active Transportation
10455	Gresham	Rockwood TC Ped and Ped to Max:188th LRT Stations and Ped to Max	\$ 8,919,615	2018-2024	Active Transportation
10502	Gresham	Bike signs	\$ 1,400,000	2014-2017	Active Transportation
10509	Gresham	Safe walking routes, missing links	\$ 4,089,150	2018-2024	Active Transportation
10490	Gresham	201st RR Bridge at I-84	\$ 2,359,125	2018-2024	Roads and Bridges
10516	Gresham	San Rafael	\$ 9,990,952	2033-2040	Roads and Bridges
10518	Gresham	Wilkes Street	\$ 6,781,698	2033-2040	Roads and Bridges
10445	Gresham	181st Ave. Intersection Improvement (181st/Glisan)	\$ 1,041,867	2018-2024	Roads and Bridges
10446	Gresham	181st Ave. Intersection Improvement (181st/Burnside)	\$ 831,210	2018-2024	Roads and Bridges
10495	Gresham	181st Ave	\$ 1,025,038	2018-2024	Roads and Bridges

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
10496	Gresham	181st at I-84	\$ 250,000	2025-2032	Roads and Bridges
10420	Gresham	Palmquist Rd. Improvements	\$ 7,784,844	2018-2024	Roads and Bridges
10421	Gresham	Burnside Rd. Blvd Improvements	\$ 7,873,990	2018-2024	Roads and Bridges
10423	Gresham	Cleveland St. Reconstruction.	\$ 1,100,000	2014-2017	Roads and Bridges
10424	Gresham	Wallula St. Reconstruction, + intersections	\$ 8,347,988	2025-2032	Roads and Bridges
10425	Gresham	1st Street/Bull Run. Reconstruction	\$ 4,466,312	2018-2024	Roads and Bridges
10427	Gresham	Regner Rd. Reconstruction	\$ 29,265,570	2018-2024	Roads and Bridges
10430	Gresham	Orient Dr. Imps.	\$ 9,000,000	2018-2024	Roads and Bridges
10431	Gresham	Highland/190th Rd. Widening	\$ 19,646,521	2018-2024	Roads and Bridges
10434	Gresham	Burnside St. Improvements	\$ 32,545,601	2018-2024	Roads and Bridges
10443	Gresham	Sandy Blvd. Widening	\$ 10,000,000	2014-2017	Roads and Bridges
10447	Gresham	162nd Ave. Imps. Plus TIF project	\$ 7,915,303	2018-2024	Roads and Bridges
10449	Gresham	201st: Halsey to Sandy	\$ 8,335,400	2025-2032	Roads and Bridges
10454	Gresham	181st Ave. Improvements	\$ 11,440,061	2018-2024	Roads and Bridges
10458	Gresham	Halsey St. Improvements	\$ 8,118,008	2025-2032	Roads and Bridges
10460	Gresham	SE 174th N/S Improvements	\$ 27,498,638	2033-2040	Roads and Bridges
10462	Gresham	Butler Rd. Improvements	\$ 13,166,455	2025-2032	Roads and Bridges
10463	Gresham	Foster Rd. Extension (north)	\$ 15,417,627	2033-2040	Roads and Bridges
10464	Gresham	Giese Rd. Extension	\$ 17,987,232	2025-2032	Roads and Bridges
10465	Gresham	172nd Ave. Improvements	\$ 11,520,364	2025-2032	Roads and Bridges
10466	Gresham	172nd Ave. Improvements	\$ 7,112,978	2025-2032	Roads and Bridges
10468	Gresham	Giese Rd. Improvements	\$ 5,430,469	2025-2032	Roads and Bridges
10471	Gresham	Butler Rd. Extension and Bridge	\$ 12,268,899	2025-2032	Roads and Bridges
10474	Gresham	Rugg Rd. Ext.	\$ 30,672,208	2033-2040	Roads and Bridges
10475	Gresham	Rugg Rd. Ext.	\$ 39,329,973	2033-2040	Roads and Bridges
10476	Gresham	Rugg Rd.	\$ 12,770,187	2033-	Roads and Bridges

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
				2040	
10477	Gresham	Springwater Road Section 4	\$ 13,148,679	2018-2024	Roads and Bridges
10478	Gresham	Palmblad/252nd/Palmquist Rd	\$ 26,162,462	2018-2024	Roads and Bridges
10479	Gresham	252nd/Palmblad	\$ 9,808,690	2018-2024	Roads and Bridges
10480	Gresham	Springwater Plan Road/Springwater Road Section 7	\$ 8,008,421	2018-2024	Roads and Bridges
10481	Gresham	Springwater Planned Road/Springwater Road 8	\$ 5,519,551	2018-2024	Roads and Bridges
10482	Gresham	McNutt Road/Springwater Road 9,10,11	\$ 41,242,122	2018-2024	Roads and Bridges
10485	Gresham	Hogan	\$ 47,291,190	2018-2024	Roads and Bridges
10486	Gresham	Telford Rd.	\$ 29,419,888	2024-2032	Roads and Bridges
10488	Gresham	282nd Ave.	\$ 7,146,436	2018-2024	Roads and Bridges
10493	Gresham	181st Ave. Sandy to I-84	\$ 827,659	2033-2040	Roads and Bridges
10499	Gresham	192nd Ave	\$ 3,833,031	2018-2024	Roads and Bridges
10501	Gresham	Barnes Rd	\$ 7,135,229	2025-2032	Roads and Bridges
10505	Gresham	Civic Neighborhood TOD	\$ 4,765,219	2018-2024	Roads and Bridges
10512	Gresham	Hogan: Powell to Burnside boulevard improvements plus three intersection improvements	\$ 8,739,328	2018-2024	Roads and Bridges
10527	Gresham	Hogan	\$ 8,444,619	2018-2024	Roads and Bridges
10530	Gresham	Towle Ave. Butler Rd. to Binford Lake	\$ 11,897,840	2025-2032	Roads and Bridges
10533	Gresham	190th	\$ 28,644,245	2025-2032	Roads and Bridges
10534	Gresham	Cheldelin	\$ 19,795,513	2033-2040	Roads and Bridges
10537	Gresham	Richey	\$ 7,925,735	2025-2032	Roads and Bridges
10541	Gresham	182nd	\$ 11,797,690	2033-2040	Roads and Bridges
10543	Gresham	172nd	\$ 8,651,396	2033-2040	Roads and Bridges
10860	Gresham	Knapp Street/Collector 72	\$ 10,703,002	2033-2040	Roads and Bridges
10861	Gresham	Knapp Street/Collector 72	\$ 10,368,393	2025-2032	Roads and Bridges
10862	Gresham	Knapp Street/Community	\$ 9,991,393	2018-	Roads and Bridges

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
		Street 72		2024	
11099	Gresham	Barnes	\$ 7,135,229	2033-2040	Roads and Bridges
10450	Gresham	2 Birdsdales Projects, at Division	\$ 1,375,500	2018-2024	Roads and Bridges
10472	Gresham	Eastman at Division	\$ 912,928	2025-2032	Roads and Bridges
10473	Gresham	Eastman at Stark	\$ 1,196,756	2018-2024	Roads and Bridges
10494	Gresham	162nd	\$ 888,209	2018-2024	Roads and Bridges
10497	Gresham	181st	\$ 1,884,390	2018-2024	Roads and Bridges
10498	Gresham	181st (182nd) at Division/Powell Intersections	\$ 1,682,670	2018-2024	Roads and Bridges
10503	Gresham	Burnside	\$ 683,517	2018-2024	Roads and Bridges
10511	Gresham	Hogan Road	\$ 1,908,431	2018-2024	Roads and Bridges
10856	Gresham	Richey/Foster Connection	\$ 656,452	2033-2040	Roads and Bridges
10469	Gresham	Foster Rd. Bridge	\$ 2,642,220	2025-2032	Roads and Bridges
10442	Gresham	Phase 3 Signal Optimization	\$ 6,227,280	2018-2024	TSMO/TDM
10506	Gresham	Transit: Columbia Corridor TMA	\$ 185,258	2018-2024	TSMO/TDM
10521	Gresham	Signalize intersections	\$ 768,590	2018-2024	TSMO/TDM
11374	Gresham	Powell-Division Transit and Development Project	\$ 32,481,500	2014-2017	Active Transportation
10081	Happy Valley	122nd/129th Improvements	\$ 3,500,000	2014-2017	Active Transportation
10037	Happy Valley	162nd Ave.	\$ 2,600,000	2018-2024	Roads and Bridges
10040	Happy Valley	162nd Ave. Extension North	\$ 27,970,000	2025-2032	Roads and Bridges
10060	Happy Valley	SE 132nd Ave.	\$ 3,047,500	2025-2032	Roads and Bridges
11135	Happy Valley	Rock Creek Blvd. improvements	\$ 22,270,000	2018-2024	Roads and Bridges
11271	Happy Valley	Misty Drive	\$ 27,850,000	2018-2024	Roads and Bridges
10041	Happy Valley	162nd Ave. Extension South Phase 1	\$ 5,000,000	2014-2017	Roads and Bridges
11346	Happy Valley	162nd Ave. Extension South Phase 2	\$ 15,600,000	2025-2032	Roads and Bridges
11529	Happy Valley	Armstrong Extension	\$ 14,300,000	2025-2032	Roads and Bridges
11530	Happy Valley	Troge Extension West	\$ 23,200,000	2033-2040	Roads and Bridges

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
10084	Happy Valley	King Rd.	\$ 1,150,000	2025-2032	Roads and Bridges
10850	Hillsboro	Beaverton Ck Trail, Bronson Ck Trail,	\$ 1,000,000	2033-2040	Active Transportation
10851	Hillsboro	Rock Ck Trail - Multi Use	\$ 5,520,000	2033-2040	Active Transportation
11153	Hillsboro	Golden Rd.	\$ 2,000,000	2014-2017	Active Transportation
11167	Hillsboro	Garibaldi	\$ 500,000	2014-2017	Active Transportation
11138	Hillsboro	206th Ave	\$ 1,200,000	2018-2024	Active Transportation
11142	Hillsboro	37th Ave	\$ 1,000,000	2014-2017	Active Transportation
11151	Hillsboro	Bentley St.	\$ 3,000,000	2033-2040	Active Transportation
11152	Hillsboro	Cedar St.	\$ 1,000,000	2014-2017	Active Transportation
11157	Hillsboro	Imlay Ave.	\$ 2,000,000	2033-2040	Active Transportation
11158	Hillsboro	206th Ave.	\$ 3,000,000	2025-2032	Active Transportation
11159	Hillsboro	Alexander St.	\$ 1,000,000	2018-2024	Active Transportation
11160	Hillsboro	Witch Hazel Rd.	\$ 1,000,000	2033-2040	Active Transportation
11161	Hillsboro	Rood Bridge Rd	\$ 2,500,000	2033-2040	Active Transportation
11162	Hillsboro	24th Ave	\$ 4,000,000	2025-2032	Active Transportation
11163	Hillsboro	Sunrise Lane	\$ 1,700,000	2025-2032	Active Transportation
11164	Hillsboro	17th Ave	\$ 1,000,000	2025-2032	Active Transportation
11165	Hillsboro	15th Ave.	\$ 1,500,000	2025-2032	Active Transportation
11166	Hillsboro	25th Ave.	\$ 1,500,000	2025-2032	Active Transportation
11168	Hillsboro	Connell	\$ 500,000	2014-2017	Active Transportation
11282	Hillsboro	Minter Bridge Rd	\$ 2,000,000	2018-2024	Active Transportation
10848	Hillsboro	Tanasbourne/Amberglen Ped and Bike Improvements	\$ 5,000,000	2033-2040	Active Transportation
10849	Hillsboro	Regional Center- Bike and Ped Improvement	\$ 5,000,000	2018-2024	Active Transportation
11382	Hillsboro	City-wide	\$ 2,000,000	2018-2024	Active Transportation
10817	Hillsboro	Aloclek	\$ 2,000,000	2025-2032	Roads and Bridges
10818	Hillsboro	231st Ave./Century Blvd	\$ 16,500,000	2018-	Roads and Bridges

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
				2024	
10819	Hillsboro	231st Ave./Century Blvd	\$ 5,000,000	2025-2032	Roads and Bridges
10820	Hillsboro	Brookwood (247th)	\$ 1,700,000	2014-2017	Roads and Bridges
10821	Hillsboro	Huffman	\$ 7,890,000	2014-2017	Roads and Bridges
10822	Hillsboro	253rd	\$ 5,000,000	2014-2017	Roads and Bridges
10823	Hillsboro	Amberwood	\$ 1,500,000	2025-2032	Roads and Bridges
10825	Hillsboro	Amberglen Parkway	\$ 1,800,000	2018-2024	Roads and Bridges
10826	Hillsboro	Jackson School Road	\$ 7,000,000	2018-2024	Roads and Bridges
10827	Hillsboro	Quatama Road	\$ 1,800,000	2025-2032	Roads and Bridges
10828	Hillsboro	Edgeway	\$ 4,000,000	2033-2040	Roads and Bridges
10830	Hillsboro	Johnson	\$ 8,000,000	2033-2040	Roads and Bridges
10831	Hillsboro	Century Blvd	\$ 12,920,000	2025-2032	Roads and Bridges
10835	Hillsboro	185th Ave.	\$ 10,000,000	2033-2040	Roads and Bridges
10836	Hillsboro	Evergreen Rd	\$ 5,440,000	2025-2032	Roads and Bridges
10837	Hillsboro	Campus Court Extension	\$ 1,500,000	2014-2017	Roads and Bridges
10838	Hillsboro	Davis Road	\$ 2,700,000	2014-2017	Roads and Bridges
10839	Hillsboro	Century Blvd (234th)	\$ 4,000,000	2014-2017	Roads and Bridges
10846	Hillsboro	TV Hwy.	\$ 25,000,000	2025-2032	Roads and Bridges
11140	Hillsboro	Brookwood Parkway	\$ 9,000,000	2025-2032	Roads and Bridges
11150	Hillsboro	Jacobson Rd.	\$ 2,500,000	2025-2032	Roads and Bridges
11136	Hillsboro	TV Hwy/209th Intersection	\$ 3,800,000	2018-2024	Roads and Bridges
11137	Hillsboro	TV Hwy/Century Blvd Intersection	\$ 1,800,000	2014-2017	Roads and Bridges
11141	Hillsboro	Brogden Ave	\$ 3,000,000	2025-2032	Roads and Bridges
11145	Hillsboro	Airport Rd	\$ 1,500,000	2033-2040	Roads and Bridges
11147	Hillsboro	Schaaf Rd	\$ 4,000,000	2025-2032	Roads and Bridges
11148	Hillsboro	Westmark Dr.	\$ 1,700,000	2025-2032	Roads and Bridges
11149	Hillsboro	Helvetia Rd.	\$ 4,000,000	2033-	Roads and Bridges

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
				2040	
11169	Hillsboro	Cornell/25th Ave Intersection Improvements	\$ 6,000,000	2018-2024	Roads and Bridges
11170	Hillsboro	Cornell/Brookwood Prkwy Intersection Improvements	\$ 3,300,000	2018-2024	Roads and Bridges
11272	Hillsboro	Kinnaman Rd. Extension	\$ 7,900,000	2018-2024	Roads and Bridges
11273	Hillsboro	Alexander St. Extension	\$ 7,000,000	2014-2017	Roads and Bridges
11274	Hillsboro	Century Blvd Extension	\$ 3,000,000	2014-2017	Roads and Bridges
11275	Hillsboro	Walker Rd. Extension	\$ 2,500,000	2018-2024	Roads and Bridges
11276	Hillsboro	Stucki Ave. Extension	\$ 10,000,000	2018-2024	Roads and Bridges
11277	Hillsboro	194th Ave. Extension	\$ 3,000,000	2018-2024	Roads and Bridges
11280	Hillsboro	East-West Connector Ronler Dr	\$ 2,000,000	2018-2024	Roads and Bridges
11284	Hillsboro	Farmington Rd	\$ 24,000,000	2033-2040	Roads and Bridges
11285	Hillsboro	Farmington Rd	\$ 18,000,000	2033-2040	Roads and Bridges
11341	Hillsboro	West Union Rd.	\$ 25,000,000	2033-2040	Roads and Bridges
11389	Hillsboro	Imbrie Dr	\$ 2,500,000	2025-2032	Roads and Bridges
11394	Hillsboro	229th Ave	\$ 9,200,000	2033-2040	Roads and Bridges
10553	Hillsboro	209th Improvements	\$ 27,391,000	2018-2032	Roads and Bridges
10829	Hillsboro	Wilkins Extension	\$ 16,000,000	2018-2040	Roads and Bridges
10834	Hillsboro	28th Ave.	\$ 3,750,000	2014-2017	Roads and Bridges
10844	Hillsboro	Cornelius Pass Road	\$ 26,500,000	2014-2032	Roads and Bridges
11383	Hillsboro	N-S Collector Rd	\$ 2,500,000	2018-2024	Roads and Bridges
11384	Hillsboro	Rosa Rd	\$ 8,300,000	2018-2024	Roads and Bridges
11385	Hillsboro	229th Ave	\$ 6,500,000	2018-2024	Roads and Bridges
11386	Hillsboro	198th Ave	\$ 3,000,000	2025-2032	Roads and Bridges
11387	Hillsboro	Meek Rd	\$ 6,500,000	2025-2032	Roads and Bridges
11388	Hillsboro	264th Ave	\$ 12,600,000	2025-2032	Roads and Bridges
11393	Hillsboro	US 26	\$ 25,000,000	2033-	Roads and Bridges

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
				2040	
11665	Hillsboro	28th Ave.	\$ 3,000,000	2014-2017	Roads and Bridges
11359	Hillsboro	Northbound Cornelius Pass Road to US 26 Eastbound	\$ 1,500,000	2014-2017	Roads and Bridges
11395	Hillsboro	Baseline Rd Improvements	\$ 9,000,000	2014-2017	Roads and Bridges
11363	Hillsboro	Gibbs Drive	\$ 2,000,000	2025-2032	Roads and Bridges
11364	Hillsboro	253rd	\$ 4,000,000	2014-2017	Roads and Bridges
11368	Hillsboro	US 26 Westbound Off Ramp	\$ 5,000,000	2018-2024	Roads and Bridges
11365	Hillsboro	Brookwood Parkway	\$ 11,000,000	2014-2017	Roads and Bridges
11366	Hillsboro	Butler Drive	\$ 2,000,000	2014-2017	Roads and Bridges
11367	Hillsboro	Cornelius Pass Road	\$ 13,000,000	2014-2017	Roads and Bridges
11368	Hillsboro	US 26 Westbound Off Ramp	\$ 5,000,000	2018-2024	Roads and Bridges
11390	Hillsboro	TV Hwy/198th Intersection	\$ 1,300,000	2025-2032	Roads and Bridges
11391	Hillsboro	TV Hwy/Cornelius Pass Rd Intersection	\$ 7,200,000	2025-2032	Roads and Bridges
11392	Hillsboro	TV Hwy/River Rd Intersection	\$ 2,000,000	2033-2040	Roads and Bridges
11278	Hillsboro	Red Line LRT Extension	\$ 25,000,000	2025-2032	Transit
11381	Hillsboro	Transit Stop Enhancements	\$ 5,000,000	2018-2024	Transit
10086	Lake Oswego	River-to-River Trail	\$ 6,800,000	2033-2040	Active Transportation
10087	Lake Oswego	Lake Oswego to Portland Trail	\$ 80,000,000	2033-2040	Active Transportation
11171	Lake Oswego	Tryon Creek Ped Bridge (@Tryon Cove Park)	\$ 2,520,000	2025-2032	Active Transportation
11172	Lake Oswego	Hwy 43 (State St) Bike Lanes	\$ 7,587,000	2033-2040	Active Transportation
11396	Lake Oswego	South Shore Pathway	\$ 7,300,000	2018-2024	Active Transportation
11397	Lake Oswego	Hwy 43 Pathway: LO to West Linn	\$ 46,100,000	2033-2040	Active Transportation
10088	Lake Oswego	Lower Boones Ferry Rd.	\$ 27,000,000	2014-2017	Roads and Bridges
11081	Lake Oswego	Boones Ferry Rd bike lanes	\$ 9,908,000	2025-2032	Roads and Bridges
11044	Metro	Regional Trail Master Plans	\$ 1,100,000	2018-2024	Active Transportation
10855	Metro	Regional TOD Implementation Program	\$ 67,500,000	2014-2040	Regional Program

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
11054	Metro	Regional Travel Options Program	\$ 74,250,000	2014-2040	Regional Program
11103	Metro	Regional Planning	\$ 67,500,000	2014-2040	Regional Program
11104	Metro	Regional TSMO	\$ 40,500,000	2014-2040	Regional Program
11664	Metro	Next Corridor Program	\$ 5,000,000	2014-2017	Regional Program
10095	Milwaukie	Railroad Ave Capacity Improvements	\$ 6,600,000	2014-2017	Active Transportation
10097	Milwaukie	Group 5--Stanley Avenue Neighborhood Greenway Improvements	\$ 5,150,000	2018-2024	Active Transportation
10099	Milwaukie	Group 1--Monroe St Neighborhood Greenway	\$ 2,140,000	2014-2017	Active Transportation
10101	Milwaukie	Kellogg Creek Dam Removal and Hwy 99E Underpass	\$ 9,900,000	2014-2017	Active Transportation
10109	Milwaukie	Kellogg Creek Bike/Ped Bridge	\$ 2,500,000	2014-2017	Active Transportation
10113	Milwaukie	Group 2--Pedestrian and Bicycle Improvements in Island Station	\$ 1,500,000	2014-2017	Active Transportation
11534	Milwaukie	Lake Rd Bike Lanes	\$ 3,400,000	2018-2024	Active Transportation
11535	Milwaukie	Group 6--Sidewalk & Pedestrian Safety Projects (part 1)	\$ 2,710,000	2018-2024	Active Transportation
11541	Milwaukie	Group 7--Bicycle Infrastructure Improvements	\$ 4,880,000	2025-2032	Active Transportation
11533	Milwaukie	Bicycle and Pedestrian Overpass over Railroad Ave	\$ 2,200,000	2018-2024	Active Transportation
11671	Milwaukie	Linwood Ave Sidewalks (south)	\$ 2,150,000	2014-2017	Active Transportation
11537	Milwaukie	Group 4--Pedestrian Improvements at Hwy 224	\$ 2,330,000	2018-2024	Active Transportation
11535	Milwaukie	Group 6--Sidewalk & Pedestrian Safety Projects (part 1)	\$ 2,710,000	2018-2024	Active Transportation
10107	Milwaukie	Harrison St Railroad Crossing Separation	\$ 30,700,000	2033-2040	Roads and Bridges
11532	Milwaukie	Linwood Ave Capacity Improvements (south)	\$ 12,500,000	2018-2024	Roads and Bridges
11538	Milwaukie	Linwood Ave Capacity Improvements (north)	\$ 9,300,000	2025-2032	Roads and Bridges
11542	Milwaukie	Harrison St Capacity Improvements	\$ 2,800,000	2025-2032	Roads and Bridges
11540	Milwaukie	Group 8--Street Connectivity & Intersection Improvement	\$ 1,830,000	2025-2032	Roads and Bridges

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
		Projects			
11540	Milwaukie	Group 8--Street Connectivity & Intersection Improvement Projects	\$ 1,830,000	2025-2032	Roads and Bridges
11539	Milwaukie	Intersection Improvements at McLoughlin Blvd and River Rd	\$ 980,000	2025-2032	Roads and Bridges
11536	Milwaukie	Downtown Transit Center Improvements	\$ 1,250,000	2018-2024	Transit
10403	Multnomah Co.	257th Ave. Pedestrian improvements at intersections and mid-block crossings	\$ 1,600,000	2014-2017	Active Transportation
10408	Multnomah Co.	40 Mile Loop Trail	\$ 2,588,000	2014-2017	Active Transportation
10405	Multnomah Co.	Pedestrian Improvements	\$ 1,940,000	2018-2024	Active Transportation
10394	Multnomah Co.	Replace RR Over-crossing on 223rd Ave.	\$ 7,000,000	2018-2024	Roads and Bridges
10396	Multnomah Co.	Reconstruct Cornelius Pass Rd.	\$ 45,000,000	2018-2024	Roads and Bridges
10382	Multnomah Co.	Reconstruct Stark St. to arterial standards	\$ 3,150,000	2014-2017	Roads and Bridges
10384	Multnomah Co.	Reconstruct Scholls Ferry Rd.	\$ 5,800,000	2018-2024	Roads and Bridges
10385	Multnomah Co.	Reconstruct Halsey St. with Improvements	\$ 1,080,900	2014-2017	Roads and Bridges
10387	Multnomah Co.	Reconstruct Arata Rd.	\$ 4,500,000	2014-2017	Roads and Bridges
10388	Multnomah Co.	Reconstruct 223rd Ave.	\$ 2,098,768	2014-2017	Roads and Bridges
10389	Multnomah Co.	Reconstruct 223rd Ave.	\$ 2,076,029	2014-2017	Roads and Bridges
10390	Multnomah Co.	Reconstruct Troutdale Rd.	\$ 8,297,000	2025-2032	Roads and Bridges
10391	Multnomah Co.	Reconstruct Historic Columbia River Hwy.	\$ 6,151,000	2025-2032	Roads and Bridges
10398	Multnomah Co.	Wood Village Blvd Extension	\$ 1,573,000	2014-2017	Roads and Bridges
10399	Multnomah Co.	Reconstruct Sandy Blvd.	\$ 7,438,000	2014-2017	Roads and Bridges
10401	Multnomah Co.	Reconstruct Marine Dr.	\$ 14,000,000	2025-2032	Roads and Bridges
10404	Multnomah Co.	Beaver Creek Culvert Replacement	\$ 2,500,000	2014-2017	Roads and Bridges
10406	Multnomah Co.	Reconstruct Stark St. to arterial standards	\$ 1,810,000	2018-2024	Roads and Bridges
10410	Multnomah Co.	Broadway Bridge Rehabilitation	\$ 22,700,000	2014-2017	Roads and Bridges

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
10411	Multnomah Co.	Burnside Bridge Rehabilitation - Phase 1	\$ 32,000,000	2014-2017	Roads and Bridges
10412	Multnomah Co.	Morrison Bridge Rehabilitation - Phase 1	\$ 25,700,000	2014-2017	Roads and Bridges
10413	Multnomah Co.	Hawthorne Bridge Rehabilitation	\$ 13,300,000	2018-2024	Roads and Bridges
10414	Multnomah Co.	Sellwood Bridge Replacement	\$ 58,000,000	2014-2017	Roads and Bridges
11128	Multnomah Co.	Morrison Bridge Rehabilitation - Phase 2	\$ 19,300,000	2018-2024	Roads and Bridges
11129	Multnomah Co.	Burnside Bridge Rehabilitation - Phase 2	\$ 16,600,000	2018-2024	Roads and Bridges
11295	Multnomah Co.	Cornelius Pass Road Reconstuction (north)	\$ 22,000,000	2018-2024	Roads and Bridges
11296	Multnomah Co.	Cornelius Pass Road Reconstuction (south)	\$ 20,000,000	2018-2024	Roads and Bridges
10395	Multnomah Co.	Replace RR over crossing at Historic Columbia River Hwy	\$ 7,000,000	2025-2032	Roads and Bridges
10386	Multnomah Co./Gresham	Glisan St. Multi-modal Improvements	\$ 11,500,000	2018-2024	Roads and Bridges
10383	Multnomah Co./Gresham	I-84 to US26 Connection(s)	\$ 189,000,000	2014-2017	Roads and Bridges
10409	Multnomah County	Beaver Creek Trail	\$ 1,400,000	2014-2017	Active Transportation
11360	Multnomah County	Sellwood Bridge Replacement	\$ 263,800,000	2014-2017	Roads and Bridges
11373	Multnomah County	NE 238th Drive Freight and Multimodal Improvements	\$ 9,000,000	2014-2017	Roads and Bridges
11377	Multnomah County	Seismic Analysis for Broadway, Burnside, Morrison, Hawthorne Briges	\$ 6,500,000	2014-2017	Roads and Bridges
11375	Multnomah County	Stark Street Bridge	\$ 15,000,000	2018-2024	Roads and Bridges
10067	North Clackamas PRD	Phillips Creek Trail	\$ 2,270,000	2033-2040	Active Transportation
10070	North Clackamas PRD	Mt. Scott Scouters Mt Trail	\$ 14,170,000	2018-2024	Active Transportation
10874	ODOT	I-5 Delta Park Phase 2 (99W / Denver)	\$ 10,000,000	2014-2017	Active Transportation
10863	ODOT	Troutdale Interchange (Exit 17) Improvements	\$ 32,200,000	2014-2017	Roads and Bridges
11403	ODOT	I-5 Delta Park Phase 3 (99W / Denver Avenue)	\$ 30,000,000	2033-2040	Roads and Bridges
11179	ODOT	I-5 to 99W replacement projects	\$ 10,000,000	2014-2017	Roads and Bridges

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
11349	ODOT	Hwy-212/224 improvements	\$ 20,000,000	2014-2017	Roads and Bridges
11350	ODOT	Milwaukie Expressway improvements	\$ 5,000,000	2018-2024	Roads and Bridges
11181	ODOT	OR 43 Sellwood Bridge Interchange	\$ 30,000,000	2014-2017	Roads and Bridges
10864	ODOT	New interchange on US 26 to serve industrial area.	\$ 29,500,000	2033-2040	Roads and Bridges
10865	ODOT	I-205/Airport Way interchange	\$ 10,500,000	2014-2017	Roads and Bridges
10867	ODOT	I-5 from I-405 to I-84 (Rose Quarter/Lloyd District) PE and NEPA	\$ 20,000,000	2014-2017	Roads and Bridges
10869	ODOT	Sunrise Project: Construct improvements in the Sunrise Corridor consistent with the supplemental EI	\$ 150,000,000	2014-2017	Roads and Bridges
10872	ODOT	Add lane: SB I-205 to SB I-5 interchange ramp and extend acceleration lane and add auxiliary lane o	\$ 9,700,000	2014-2017	Roads and Bridges
10873	ODOT	US 26W: Widen highway to 6 lanes	\$ 25,000,000	2014-2017	Roads and Bridges
10884	ODOT	I-5 from I-405 to I-84 (Rose Quarter/Lloyd District) Right-of-way	\$ 5,000,000	2018-2024	Roads and Bridges
10890	ODOT	Sunrise Project Phase 2: PE, Acquire right-of-way and Construction: I-205 to SE 172nd Ave	\$ 100,000,000	2018-2024	Roads and Bridges
10893	ODOT	Improve I-5/Columbia River bridge	\$2,982,000,000	2014-2017	Roads and Bridges
10894	ODOT	Sunrise Hwy. PE: I-205 to SE 172nd Ave	\$ 20,000,000	2014-2017	Roads and Bridges
11121	ODOT	I-5 Delta Park Phase 1	\$ 50,000,000	2014-2017	Roads and Bridges
11176	ODOT	I-5 from I-405 to I-84 (Rose Quarter/Lloyd District) Construction	\$ 296,390,000	2025-2032	Roads and Bridges
11369	ODOT	Interstate 205 Southbound Auxiliary Lane	\$ 8,500,000	2014-2017	Roads and Bridges
11370	ODOT	Interstate 205 Northbound Phase 1 Auxiliary Lane	\$ 7,500,000	2018-2024	Roads and Bridges
11371	ODOT	Interstate 5 Southbound: Phase 2 - Lower Boones Ferry Auxiliary Lane	\$ 8,500,000	2014-2017	Roads and Bridges
11398	ODOT	I-205 Northbound Auxiliary Lane	\$ 15,000,000	2014-2017	Roads and Bridges

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
11399	ODOT	I-205 Northbound Phase 2: Auxiliary Lane Extension	\$ 8,000,000	2033-2040	Roads and Bridges
11400	ODOT	OR 217: Southbound Auxiliary Lane	\$ 15,000,000	2018-2024	Roads and Bridges
11401	ODOT	I-5 Southbound: Phase 3 - Auxiliary Lane Extension	\$ 17,000,000	2033-2040	Roads and Bridges
11402	ODOT	I-5 Northbound: Phase 2 - Auxiliary Lane Extension	\$ 13,500,000	2033-2040	Roads and Bridges
11123	ODOT	I-5 North Macadam	\$ 15,000,000	2014-2017	Roads and Bridges
11178	ODOT	US Highway 26 at Shute Road interchange improvements	\$ 45,000,000	2014-2017	Roads and Bridges
10875	ODOT	OR 217: ITS Project	\$ 21,500,000	2014-2017	TSMO/TDM
10124	Oregon City	Molalla Ave. Boulevard Improvements - (Holmes to Beaver Creek Road)	\$ 5,400,000	2025-2032	Active Transportation
10125	Oregon City	Molalla Ave. Streetscape Improvements (Beaver Creek Road to Hwy 213)	\$ 8,000,000	2014-2017	Active Transportation
10147	Oregon City	Newell Creek Canyon / Holly Lane Shared Use Path	\$ 4,670,000	2018-2024	Active Transportation
10148	Oregon City	Oregon City Loop Trail	\$ 7,023,000	2014-2017	Active Transportation
10149	Oregon City	Beaver Lake Trail	\$ 1,787,000	2033-2040	Active Transportation
10150	Oregon City	Barlow Rd. Trail	\$ 4,305,000	2025-2032	Active Transportation
10151	Oregon City	Trolley Trail Bridge	\$ 2,000,000	2025-2032	Active Transportation
11184	Oregon City	Main Street Ped and Bike Imp.	\$ 7,500,000	2014-2017	Active Transportation
11187	Oregon City	Abernethy Road Improvements	\$ 1,315,000	2018-2024	Active Transportation
11546	Oregon City	Meyers / Beaver Creek Shared Use Path	\$ 2,000,000	2018-2024	Active Transportation
11552	Oregon City	Highway 99E Overcrossing	\$ 6,095,000	2025-2032	Active Transportation
10123	Oregon City	Willamette Falls Shared-Use Path	\$ 3,065,000	2018-2024	Active Transportation
11186	Oregon City	Willamette River Shared-Use Path	\$ 7,920,000	2025-2032	Active Transportation
11549	Oregon City	Newell Creek Canyon/Beaver Creek Road Shared-Use Path	\$ 3,360,000	2018-2024	Active Transportation
10025	Oregon City	Beaver Creek Rd. Improvements Phase 2	\$ 5,800,000	2018-2024	Roads and Bridges

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
10026	Oregon City	Beavercreek Rd. Improvements Phase 3	\$ 12,920,000	2025-2032	Roads and Bridges
10048	Oregon City	Holly Lane	\$ 16,055,000	2033-2040	Roads and Bridges
10118	Oregon City	McLoughlin Blvd. Improvements - (R/R Tunnel to 10th Street)	\$ 18,000,000	2025-2032	Roads and Bridges
10119	Oregon City	Hwy. 213 - Phase 2	\$ 12,000,000	2018-2024	Roads and Bridges
10120	Oregon City	Washington St. Improvements	\$ 1,785,000	2018-2024	Roads and Bridges
10140	Oregon City	Hwy. 213 - (SOUTH)	\$ 4,970,000	2018-2024	Roads and Bridges
11088	Oregon City	Holly Lane	\$ 18,000,000	2033-2040	Roads and Bridges
11183	Oregon City	Linn/Leland/Meyers Road pedestrian and bike improvement project	\$ 4,100,000	2014-2017	Roads and Bridges
11543	Oregon City	Regional Center Road	\$ 18,800,000	2018-2024	Roads and Bridges
11544	Oregon City	Meyers Road Extension	\$ 8,600,000	2018-2024	Roads and Bridges
11547	Oregon City	Claimont Drive Extension	\$ 1,900,000	2018-2024	Roads and Bridges
11548	Oregon City	Washington St. Improvements	\$ 1,500,000	2018-2024	Roads and Bridges
11550	Oregon City	Holly Lane	\$ 4,500,000	2025-2032	Roads and Bridges
11551	Oregon City	South End Road	\$ 7,250,000	2025-2032	Roads and Bridges
11545	Oregon City	Holly Lane	\$ 4,500,000	2018-2024	Roads and Bridges
11182	Oregon City	Molalla Ave. Roundabout	\$ 1,500,000	2018-2024	Roads and Bridges
10368	Port of Portland	PIC Ped/Bike Network	\$ 1,163,835	2014-2017	Active Transportation
10214	Port of Portland	Lombard, N (Rivergate - to T-6): Multi-modal Improvements	\$ 30,000,000	2014-2017	Roads and Bridges
10371	Port of Portland	Airport Way Braided Ramps	\$ 59,000,000	2018-2024	Roads and Bridges
11307	Port of Portland	T6 Suttle Road entrance	\$ 3,000,000	2014-2017	Roads and Bridges
11355	Port of Portland	Barnes to Terminal 4 Rail	\$ 3,000,000	2018-2024	Roads and Bridges
11356	Port of Portland	Kenton Rail Line Upgrade	\$ 25,382,000	2018-2024	Roads and Bridges
11656	Port of Portland	Airport Way Terminal Entrance Rdwy	\$ 708,000	2014-2017	Roads and Bridges
11652	Port of Portland	Bonneville Rail Yard Build Out	\$ 3,600,000	2018-2024	Roads and Bridges
11653	Port of	Ramsey Yard Utilization	\$ 1,700,000	2014-	Roads and Bridges

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
	Portland			2017	
11649	Port of Portland	T2 Redevelopment	\$ 4,500,000	2014-2017	Roads and Bridges
11651	Port of Portland	T2 Track Reconfiguration and Siding	\$ 8,900,000	2018-2024	Roads and Bridges
11657	Port of Portland	Terminal Deplaning Rdwy Expansion	\$ 4,116,000	2014-2017	Roads and Bridges
11658	Port of Portland	Terminal Enplaning Rdwy Expansion	\$ 3,500,000	2014-2017	Roads and Bridges
11655	Port of Portland	Terminal Exit Roadway Widening	\$ 2,208,000	2014-2017	Roads and Bridges
11654	Port of Portland	Time Oil Road Reconstruction	\$ 9,000,000	2018-2024	Roads and Bridges
10360	Port of Portland	Airport Way Return and Exit Roadways	\$ 6,400,900	2014-2017	Roads and Bridges
10362	Port of Portland	82nd Ave./Airport Way Grade Separation	\$ 92,000,000	2014-2017	Roads and Bridges
10363	Port of Portland	SW Quad Access	\$ 5,917,500	2014-2017	Roads and Bridges
10366	Port of Portland	Airtrans Way and Cornfoot Road Intersection Improvements	\$ 650,000	2018-2024	Roads and Bridges
10375	Port of Portland	Cathedral Park Quiet Zone	\$ 8,200,000	2014-2017	Roads and Bridges
10378	Port of Portland	T-6 Internal Overcrossing	\$ 3,649,084	2014-2017	Roads and Bridges
10379	Port of Portland	Marine Dr. Improvement Phase 2	\$ 13,644,200	2018-2024	Roads and Bridges
11207	Port of Portland	T6 Modernization	\$ 8,000,000	2014-2017	Roads and Bridges
11208	Port of Portland	T4 Modernization	\$ 14,906,000	2014-2017	Roads and Bridges
11209	Port of Portland	Airport Way East Terminal Access Link Roadway	\$ 19,092,300	2018-2024	Roads and Bridges
11306	Port of Portland	T6 Second Entrance from Marine Drive	\$ 12,000,000	2018-2024	Roads and Bridges
11353	Port of Portland	West Hayden Island Rail Access	\$ 3,000,000	2018-2024	Roads and Bridges
11354	Port of Portland	West Hayden Island Rail Yard	\$ 9,500,000	2018-2024	Roads and Bridges
11357	Port of Portland	Terminal 6 Rail Support Yard Improvements	\$ 10,000,000	2018-2024	Roads and Bridges
11650	Port of Portland	Northside Redevelopment	\$ 5,800,000	2014-2017	Roads and Bridges
11190	Port of Portland	Sundial Road Improvements	\$ 3,200,000	2014-2017	Roads and Bridges
10364	Port of Portland	PDX Light Rail Station/Track Realignment	\$ 16,330,700	2025-2032	Transit
10373	Port of	Rivergate ITS	\$ 480,000	2014-	TSMO/TDM

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
	Portland			2017	
10380	Port of Portland	PDX Transportation Demand Management (TDM)	\$ 500,000	2014-2017	TSMO/TDM
11659	Port/Portland	Rivergate Blvd. Overcrossing	\$ 14,200,000	2014-2017	Roads and Bridges
10159	Portland	Springwater [Trail Connection] - Sellwood Gap	\$ 3,032,411	2014-2017	Active Transportation
10162	Portland	Willamette Greenway Trail - South Waterfront	\$ 2,650,000	2014-2017	Active Transportation
10166	Portland	NW Burnside at Skyline Rd.	\$ 1,850,716	2025-2032	Active Transportation
10181	Portland	Fifties Bikeway, NE/SE (Tillamook to Woodstock)	\$ 1,595,049	2014-2017	Active Transportation
10184	Portland	Foster Rd., SE (Powell - 90th): Pedestrian/Bicycle/Safety Improvements	\$ 2,063,400	2014-2017	Active Transportation
10186	Portland	Foster & Woodstock, SE (94th - 101st): Street Improvements, Phase II	\$ 11,510,000	2018-2024	Active Transportation
10187	Portland	Foster Rd., SE (82nd - 87th): Lents Town Center Street Improvements	\$ 4,625,000	2014-2017	Active Transportation
10189	Portland	Capitol Hwy, SW	\$ 9,613,958	2018-2024	Active Transportation
10194	Portland	Killingsworth, N (Interstate - MLK Jr Blvd): Street Improvements	\$ 4,900,000	2014-2017	Active Transportation
10199	Portland	SE 136th Ave. (Division to Powell) Bikeway	\$ 6,090,590	2025-2032	Active Transportation
10203	Portland	Glisan St, NE (122nd - City Limits): Multi-modal Improvements	\$ 3,100,241	2018-2024	Active Transportation
10206	Portland	Marine Drive bike lanes 6th to 28th & off-street trail gaps between I-5 and 185th	\$ 2,130,835	2014-2017	Active Transportation
10220	Portland	Seventies Greenstreet and Bikeway, NE	\$ 4,120,727	2018-2024	Active Transportation
10221	Portland	Skyline, NW (Hwy 26 - City Limits): Shoulder Improvements	\$ 8,088,812	2025-2032	Active Transportation
10225	Portland	SE 122nd Ave Sidewalk Infill (Powellhurst/Gilbert Neighborhood)	\$ 2,358,000	2025-2032	Active Transportation
10226	Portland	Hamilton St., SW	\$ 12,420,360	2025-2032	Active Transportation
10227	Portland	SW Stephenson/SW Boones Ferry Intersection	\$ 1,438,592	2025-2032	Active Transportation
10230	Portland	Twenties Bikeway, NE/SE	\$ 2,300,000	2014-	Active

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
		(Lombard - Clinton)		2017	Transportation
10232	Portland	Flanders, NW (Steel Bridge to Westover): Bicycle Facility	\$ 2,392,337	2018-2024	Active Transportation
10234	Portland	Columbia Slough Trail system	\$ 8,460,000	2014-2017	Active Transportation
10272	Portland	Capitol Hwy, SW (Vermont - Florida): Intersection Improvements	\$ 1,898,314	2018-2024	Active Transportation
10273	Portland	Capitol Hwy, SW (Terwilliger - Sunset): Multi-modal Improvements	\$ 1,403,000	2018-2024	Active Transportation
10283	Portland	Barbur Blvd, SW (3rd - Terwilliger): Multi-modal Improvements	\$ 4,000,000	2018-2024	Active Transportation
10284	Portland	Taylor's Ferry, SW (Capitol Hwy - City Limits): Bicycle & Pedestrian Improvements	\$ 4,400,000	2018-2024	Active Transportation
10354	Portland	Fanno Creek Greenway (Red Electric) Trail	\$ 17,653,000	2018-2024	Active Transportation
11131	Portland	Vermont St., SW, (30th - 45th): Bicycle and Pedestrian Improvements	\$ 1,350,000	2018-2024	Active Transportation
11198	Portland	Portland-Milwaukie Light Rail Active Transportation Enhancements Project	\$ 34,000,000	2014-2017	Active Transportation
11345	Portland	SW Stephenson(Boones Ferry - 35th): Multi-modal Improvements	\$ 2,374,408	2025-2032	Active Transportation
11196	Portland	East Portland Advisory Bicycle Lane Network	\$ 12,000,000	2014-2017	Active Transportation
11564	Portland	Barbur Demonstration Project 19th Ave. to 26th Ave.	\$ 2,100,000	2018-2024	Active Transportation
11567	Portland	Downtown I-405 Pedestrian Safety and Operational Improvements	\$ 2,240,000	2018-2024	Active Transportation
11569	Portland	Willamette Greenway Trail/Chimney Park	\$ 2,612,381	2018-2024	Active Transportation
11571	Portland	Barbur/99W Corridor Safety and Access to Transit	\$ 3,605,001	2018-2024	Active Transportation
11372	Portland	N. Williams Traffic Safety Operations	\$ 1,640,000	2014-2017	Active Transportation
10182	Portland	St. Johns Pedestrian District, N	\$ 5,000,000	2018-2024	Active Transportation
11127	Portland	School Access Safety Improvements: various locations	\$ 499,600	2014-2017	Active Transportation

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
11133	Portland	St. Johns Truck Strategy Implementation Phase III	\$ 1,000,000	2018-2024	Active Transportation
11191	Portland	Citywide Bicycle Boulevards	\$ 31,250,000	2033-2040	Active Transportation
11193	Portland	Citywide Sidewalk Infill Program	\$ 12,500,000	2014-2017	Active Transportation
11197	Portland	Swan Island Active Transportation Access and Mobility Improvements	\$ 9,000,000	2018-2024	Active Transportation
11560	Portland	Central City Multimodal Safety Improvements	\$ 6,616,200	2014-2017	Active Transportation
11565	Portland	East Portland in Motion - Access to Employment and Education	\$ 9,116,021	2018-2024	Active Transportation
11572	Portland	Powell-Division Safety and Access to Transit	\$ 2,800,000	2018-2024	Active Transportation
11563	Portland	Southwest In Motion Active Transportation Strategy	\$ 299,934	2018-2024	Active Transportation
11566	Portland	Connected Cully	\$ 3,337,372	2018-2024	Active Transportation
11361	Portland	Portland Bike Share	\$ 4,690,000	2014-2017	Active Transportation
10210	Portland	47th, NE (Columbia - Cornfoot): Roadway & Intersection Improvements	\$ 5,541,678	2018-2024	Roads and Bridges
11570	Portland	Columbia/Alderwood	\$ 5,527,534	2018-2024	Roads and Bridges
10164	Portland	South Portal, Phase I & II	\$ 41,478,000	2018-2024	Roads and Bridges
10165	Portland	Moody/Bond Ave, Couplet - SW Bond Extension (River Parkway to Gibbs)	\$ 18,834,515	2014-2017	Roads and Bridges
10171	Portland	Burnside/Couch, West [Blvd/Streetscape]	\$ 75,895,353	2018-2024	Roads and Bridges
10191	Portland	Garden Home Rd., SW (Capitol Hwy - Multnomah): Multi-modal Improvements	\$ 1,931,033	2018-2024	Roads and Bridges
10192	Portland	Division Streetscape and Reconstruction	\$ 5,848,135	2014-2017	Roads and Bridges
10202	Portland	102nd Ave, NE/SE (Glisan - Stark): Gateway Plan District Multi-modal Improvements, Phase II	\$ 2,200,000	2014-2017	Roads and Bridges
10215	Portland	Foster Rd., SE (136th - Jenne): Multi-modal Improvements	\$ 16,963,856	2018-2024	Roads and Bridges
10218	Portland	Burgard-Lombard, N:	\$ 17,000,000	2014-	Roads and Bridges

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
		Street Improvements		2017	
10222	Portland	Flavel Dr, SE	\$ 7,294,088	2025-2032	Roads and Bridges
10224	Portland	Barbara Welch Rd., SE: Multimodal Improvements	\$ 20,191,557	2025-2032	Roads and Bridges
10334	Portland	11th/13th, NE (at Columbia Blvd.): Crossing Elimination	\$ 1,000,000	2025-2032	Roads and Bridges
11203	Portland	SW Yamhill & SW Morrison brick intersections	\$ 1,000,000	2033-2040	Roads and Bridges
11558	Portland	Inner Burnside Safety Improvements	\$ 125,000	2014-2017	Roads and Bridges
11559	Portland	NE Halsey Safety Improvements	\$ 150,000	2014-2017	Roads and Bridges
11568	Portland	St. Johns Truck Strategy Phase II	\$ 3,345,990	2018-2024	Roads and Bridges
10208	Portland	MLK O-Xing/Turn Lanes (Columbia-Lombard)	\$ 2,228,909	2018-2024	Roads and Bridges
10229	Portland	Saint Johns Truck Strategy Implementation phase II	\$ 3,345,990	2014-2017	Roads and Bridges
10336	Portland	Alderwood/Columbia Blvd/Cully, NE: Intersection Improvements	\$ 1,460,000	2014-2017	Roads and Bridges
10204	Portland	Gateway Regional Center, Local and Collector Streets	\$ 32,648,540	2018-2024	Roads and Bridges
10177	Portland	PSL - OMSI to Riverplace or South Waterfront (close loop)	\$ 19,000,000	2014-2017	Transit
10979	Portland	Burnside/Couch Streetcar, East & West [NW 23rd to E 14th]	\$ 118,500,000	2033-2040	Transit
11102	Portland	Burnside/Couch Streetcar Extension to Hollywood via Sandy Blvd	\$ 70,000,000	2033-2040	Transit
11201	Portland	SW Columbia & SW Jefferson Bus Pads: Naito - 14th	\$ 325,000	2033-2040	Transit
11202	Portland	SW 3rd & SW 4th Reconstruction (Portland)	\$ 325,000	2033-2040	Transit
11192	Portland	Streetcar Planning/ Alternatives Analysis	\$ 6,250,000	2033-2040	Transit
10173	Portland	Macadam, SW (Bancroft - Sellwood Br): ITS	\$ 401,794	2018-2024	TSMO/TDM
10174	Portland	Going, N (Interstate - Greeley): ITS	\$ 550,000	2014-2017	TSMO/TDM
10175	Portland	Yeon/St. Helens, NW (US 30): ITS	\$ 885,499	2018-2024	TSMO/TDM

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
10198	Portland	122nd, NE/SE (NE Airport Way to SE Powell Blvd): ITS	\$ 515,703	2018-2024	TSMO/TDM
10216	Portland	Smart Trips Portland, a city-wide individualized marketing strategy	\$ 13,200,000	2014-2040	TSMO/TDM
11206	Portland	Active Corridor Management Projects on I-84/Powell/Glisan/Sandy	\$ 1,500,000	2033-2040	TSMO/TDM
11561	Portland	South Rivergate Freight	\$ 3,552,899	2018-2024	TSMO/TDM
11562	Portland	Swan Island ITS	\$ 551,350	2018-2024	TSMO/TDM
10219	Portland/ODOT	Argyle on the Hill, N Columbia to N Denver Ave.	\$ 11,773,032	2018-2024	Roads and Bridges
10343	Portland/Port	West Hayden Crossing, N	\$ 99,258,000	2014-2017	Roads and Bridges
10376	Portland/Port	Columbia Blvd. Widening	\$ 14,859,000	2025-2032	Roads and Bridges
11091	Portland/Port	Columbia Blvd./I-205 Interchange: SB On-Ramp Improvement	\$ 750,000	2014-2017	Roads and Bridges
10694	Sherwood	Murdock	\$ 1,800,000	2018-2024	Active Transportation
10701	Sherwood	Regional Trail System / West fork of Tonquin Trail	\$ 5,500,000	2018-2024	Active Transportation
10706	Sherwood	99W Pedestrian Improvements	\$ 2,000,000	2018-2024	Active Transportation
10707	Sherwood	99W Regional Trail Crossing	\$ 15,000,000	2025-2032	Active Transportation
10682	Sherwood	Brookman Rd	\$ 15,000,000	2025-2032	Roads and Bridges
11614	Sherwood	Pine St Phase 2	\$ 2,000,000	2033-2040	Roads and Bridges
10684	Sherwood	Cedar Brook Way	\$ 5,600,000	2014-2017	Roads and Bridges
10693	Sherwood	Ladd Hill Rd.	\$ 6,400,000	2025-2032	Roads and Bridges
10700	Sherwood	Arrow St	\$ 8,190,000	2033-2040	Roads and Bridges
10692	Sherwood	Edy Rd Improvments	\$ 7,000,000	2018-2024	Roads and Bridges
10691	Sherwood	Sherwood Blvd Improvements	\$ 6,700,000	2033-2040	Roads and Bridges
10681	Sherwood	Elwert Rd	\$ 8,000,000	2018-2024	Roads and Bridges
10699	Sherwood	Oregon Street	\$ 5,400,000	2018-2024	Roads and Bridges
10688	Sherwood	Villa Rd.	\$ 2,700,000	2033-2040	Roads and Bridges
10695	Sherwood	Meinecke	\$ 1,500,000	2033-2040	Roads and Bridges

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
11404	Sherwood	Baler Way	\$ 3,300,000	2018-2024	Roads and Bridges
10680	Sherwood	Elwert-99W-Sunset Blvd Improvements	\$ 4,000,000	2014-2017	Roads and Bridges
10674	Sherwood	Oregon-Tonquin Roundabout	\$ 2,300,000	2018-2024	Roads and Bridges
10680	Sherwood	Elwert-99W-Sunset Blvd Improvements	\$ 4,000,000	2014-2017	Roads and Bridges
10691	Sherwood	Sherwood Blvd Improvements	\$ 6,700,000	2033-2040	Roads and Bridges
10702	Sherwood	Edy-Borchers Intersection Improvements	\$ 1,500,000	2018-2024	Roads and Bridges
11660	Sherwood	Century-Langer Intersection Improvements	\$ 1,000,000	2018-2024	Roads and Bridges
11107	SMART	Expand transit service from Wilsonville to downtown Portland	\$ 3,000,000	2014-2017	Transit
11108	SMART	Expand Service through Villebois and other west side areas	\$ 1,000,000	2014-2017	Transit
11109	SMART	Bus Replacements - including Alternative Fuel Vehicles	\$ 4,000,000	2014-2017	Transit
11343	SMART	Pedestrian Improvements	\$ 1,200,000	2014-2017	Transit
11531	SMART	Vanpool Services	\$ 1,000,000	2014-2017	Transit
10809	THPRD	Bronson Creek Trail (Community)	\$ 3,500,000	2018-2024	Active Transportation
10810	THPRD	Westside Trail (Regional)	\$ 4,000,000	2018-2024	Active Transportation
10811	THPRD	Beaverton Creek Trail (Regional)	\$ 7,000,000	2018-2024	Active Transportation
11134	THPRD	Westside Trail (Regional)	\$ 2,675,000	2014-2017	Active Transportation
11211	THPRD	Bridge crossing of Hwy. 26 by the Westside Trail	\$ 9,000,000	2018-2024	Active Transportation
11214	THPRD	Westside /Waterhouse Trail Connection	\$ 1,500,000	2014-2017	Active Transportation
11405	THPRD	Westside Trail (Regional)	\$ 5,000,000	2025-2032	Active Transportation
11406	THPRD	Fanno Creek Trail Bridge (Regional)	\$ 5,000,000	2025-2032	Active Transportation
10763	Tigard	Washington Square Regional Center Greenbelt Shared Use Path	\$ 1,800,000	2025-2032	Active Transportation
11228	Tigard	Portland & Western Rail Trail	\$ 1,250,000	2014-2017	Active Transportation
10749	Tigard	Washington Square Regional Center Pedestrian Improvements	\$ 3,900,000	2014-2017	Active Transportation

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
10760	Tigard	Tigard Town Center Pedestrian Improvements	\$ 4,880,000	2014-2017	Active Transportation
10766	Tigard	Regional Trail Gap Closure	\$ 5,000,000	2018-2024	Active Transportation
11221	Tigard	Regional Bikeway Improvements	\$ 4,000,000	2014-2017	Active Transportation
11226	Tigard	Pedestrian Improvements	\$ 5,000,000	2014-2017	Active Transportation
11227	Tigard	Neighborhood Trails & Regional Trail Connections	\$ 1,100,000	2018-2024	Active Transportation
10748	Tigard	Greenburg Road Improvements, South	\$ 6,000,000	2025-2032	Roads and Bridges
10750	Tigard	Greenburg Road Improvements	\$ 6,000,000	2018-2024	Roads and Bridges
10751	Tigard	Hwy. 217 Overcrossing	\$ 10,000,000	2025-2032	Roads and Bridges
10752	Tigard	Bonita Road Improvements	\$ 45,000,000	2025-2032	Roads and Bridges
10753	Tigard	Durham Road Improvements	\$ 8,000,000	2014-2017	Roads and Bridges
10754	Tigard	Walnut Street Extension	\$ 14,000,000	2033-2040	Roads and Bridges
10755	Tigard	72nd Ave. Improvements	\$ 13,500,000	2018-2024	Roads and Bridges
10756	Tigard	72nd Ave. Improvements	\$ 12,000,000	2018-2024	Roads and Bridges
10757	Tigard	72nd Ave. Improvements	\$ 6,000,000	2018-2024	Roads and Bridges
10759	Tigard	Dartmouth Street Improvements	\$ 2,500,000	2018-2024	Roads and Bridges
10764	Tigard	Durham Road Improvements	\$ 15,000,000	2025-2032	Roads and Bridges
10768	Tigard	Upper Boones Ferry Intersection Improvements	\$ 12,000,000	2025-2032	Roads and Bridges
10769	Tigard	Greenburg Intersection Improvements	\$ 8,000,000	2025-2032	Roads and Bridges
11217	Tigard	McDonald Street Improvements	\$ 8,000,000	2018-2024	Roads and Bridges
11220	Tigard	Hall Blvd. Improvements	\$ 18,000,000	2025-2032	Roads and Bridges
11229	Tigard	Walnut Street Improvements	\$ 7,000,000	2018-2024	Roads and Bridges
10770	Tigard	Hwy. 99W Intersection Improvements	\$ 8,000,000	2014-2017	Roads and Bridges
11409	Tigard	Ash Avenue Extension, Burnham to Maplewood	\$ 5,000,000	2033-2040	Roads and Bridges
11407	Tigard	Ash Avenue RR Crossing	\$ 4,000,000	2014-2017	Roads and Bridges
11408	Tigard	Atlanta Street Extension to Dartmouth	\$ 3,300,000	2014-2017	Roads and Bridges

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
11223	Tigard	Hall/Hunziker/Scoffins Intersection Realignment	\$ 5,000,000	2014-2017	Roads and Bridges
11224	Tigard	Greenburg/Tiedeman/N. Dakota Reconfiguration	\$ 5,500,000	2014-2017	Roads and Bridges
10747	Tigard	Hwy. 217 Overcrossing - Cascade Plaza	\$ 20,000,000	2033-2040	Roads and Bridges
11666	Tigard	Hwy. 99W Intersection Improvements	\$ 46,000,000	2018-2040	Roads and Bridges
10746	Tigard	Washington Square Connectivity Improvements	\$ 1,000,000	2025-2032	Roads and Bridges
11225	Tigard	Downtown Circulation Plan Implementation	\$ 4,000,000	2014-2017	Roads and Bridges
11414	TriMet	Corridor Safety and Access to Transit: Powell-Division	\$ 2,800,000	2014-2017	Active Transportation
11412	TriMet	Corridor Safety and Access to Transit: Barbur-99W	\$ 3,605,000	2014-2017	Active Transportation
11415	TriMet	Corridor Safety and Access to Transit: Highway 8	\$ 1,614,000	2014-2017	Active Transportation
11411	TriMet	Bike and Ride Facilities	\$ 7,500,000	2014-2017	Active Transportation
11043	TriMet	Pedestrian access improvements, Phase 1	\$ 5,000,000	2014-2017	Active Transportation
11413	TriMet	East Portland Access to Employment and Education	\$ 3,500,000	2014-2017	Active Transportation
10901	TriMet	MAX light rail: South Corridor Phase 2: Portland to Milwaukie	\$1,495,000,000	2014-2017	Transit
10902	TriMet	MAX light rail: Yellow Line: CRC / I-5 North extension	\$1,075,965,000	2018-2040	Transit
10907	TriMet	High Capacity Transit: Southwest Corridor (Portland to Tualatin via Tigard) - Project Development	\$ 75,000,000	2014-2024	Transit
10909	TriMet	Powell / Division Transit Project - Project Development	\$ 75,000,000	2014-2024	Transit
10916	TriMet	Bus Improvements: SE McLoughlin to Oregon City and CCC	\$ 6,000,000	2014-2017	Transit
10905	TriMet	Renew the Blue Station Rehabilitation	\$ 12,315,000	2014-2017	Transit
10926	TriMet	Transit dispatch center upgrade	\$ 4,000,000	2014-2017	Transit
10985	TriMet	Sunset Park & Ride rework to match Peterkort redevelopment	\$ 10,000,000	2014-2017	Transit

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
10989	TriMet	181st park & ride lot	\$ 2,000,000	2014-2017	Transit
10997	TriMet	Willow Creek Transit Center, Phase 2	\$ 8,000,000	2014-2017	Transit
11032	TriMet	Ruby Junction light rail operating base expansion	\$ -	2014-2017	Transit
10899	TriMet	Washington County Commuter Rail DMUs	\$ 8,000,000	2014-2017	Transit
10927	TriMet	MAX LRT: Operational upgrades	\$ 19,000,000	2018-2024	Transit
10928	TriMet	New MAX LRT vehicles	\$ 52,800,000	2025-2032	Transit
10990	TriMet	Park & Ride management strategy implementation	\$ 1,000,000	2018-2024	Transit
10998	TriMet	Bus replacements	\$ 385,128,000	2014-2040	Transit
10999	TriMet	Bus purchases for congestion and expansion	\$ 15,488,000	2018-2040	Transit
11016	TriMet	LIFT vehicle replacement and expansion of fleet	\$ 106,250,000	2014-2040	Transit
11035	TriMet	Powell bus operating base expansion	\$ 12,571,700	2014-2017	Transit
11038	TriMet	Center Street bus operating base expansion	\$ -	2014-2017	Transit
11042	TriMet	Bus priority treatment	\$ 15,000,000	2018-2040	Transit
11230	TriMet	Frequent Service Bus Capital Improvements - Phase 1	\$ 15,000,000	2014-2017	Transit
11592	TriMet	Portland-Milwaukie LRT Corridor TOD development	\$ 15,000,000	N/A	Transit
11595	TriMet	Argyle Equitable TOD development	\$ 4,000,000	N/A	Transit
11593	TriMet	CNG Conversion at Merlo Operating Base	\$ 13,900,000	N/A	Transit
11410	TriMet	Positive Train Control	\$ 8,200,000	2014-2017	Transit
11378	Troutdale	Sundial Road Widening	\$ 2,287,000	2014-2017	Roads and Bridges
11231	Troutdale/Port	Swigert Way Extension	\$ 2,500,000	2014-2017	Roads and Bridges
11232	Troutdale/Port	Graham Road Reconstruction	\$ 13,500,000	2014-2017	Roads and Bridges
10739	Tualatin	Nyberg	\$ 7,000,000	2018-2024	Active Transportation
10741	Tualatin	95th Ave.	\$ 2,920,000	2025-2032	Active Transportation
10742	Tualatin	108th Ave.	\$ 2,434,000	2025-2032	Active Transportation
10743	Tualatin	99W	\$ 10,400,000	2025-	Active

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
				2032	Transportation
10744	Tualatin	Tualatin River Pathway	\$ 8,451,000	2025-2032	Active Transportation
10745	Tualatin	Nyberg Creek Greenway Trail	\$ 1,947,000	2014-2017	Active Transportation
11426	Tualatin	65th Ave.	\$ 9,734,000	2025-2032	Active Transportation
11427	Tualatin	Ice Age Tonquin Trail	\$ 22,705,000	2025-2032	Active Transportation
11428	Tualatin	Martinazzi	\$ 2,403,000	2025-2032	Active Transportation
11429	Tualatin	Sagert	\$ 3,282,000	2025-2032	Active Transportation
11432	Tualatin	I-5 Path	\$ 3,245,000	2033-2040	Active Transportation
11433	Tualatin	Saum Creek Greenway	\$ 2,135,000	2033-2040	Active Transportation
11434	Tualatin	Norwood	\$ 3,757,000	2033-2040	Active Transportation
11435	Tualatin	Westside Trail Pedestrian Bridge	\$ 8,551,749	2033-2040	Active Transportation
10737	Tualatin	Central Design District Pedestrian Improvements	\$ 10,600,000	2018-2024	Active Transportation
10712	Tualatin	Boones Ferry	\$ 17,818,000	2025-2032	Roads and Bridges
10714	Tualatin	105th Ave/Avery Street	\$ 5,000,000	2014-2017	Roads and Bridges
10715	Tualatin	Herman	\$ 2,390,000	2014-2017	Roads and Bridges
10716	Tualatin	Myslony	\$ 11,437,000	2014-2017	Roads and Bridges
10717	Tualatin	Cipole	\$ 20,030,000	2025-2032	Roads and Bridges
10718	Tualatin	Herman	\$ 2,574,000	2014-2017	Roads and Bridges
10721	Tualatin	McEwan	\$ 3,520,000	2025-2032	Roads and Bridges
10738	Tualatin	Teton	\$ 2,464,000	2025-2032	Roads and Bridges
10709	Tualatin	Sagert	\$ 2,750,000	2018-2024	Roads and Bridges
10729	Tualatin	Loop Rd	\$ 2,463,000	2014-2017	Roads and Bridges
11417	Tualatin	115th	\$ 6,000,000	2018-2024	Roads and Bridges
11418	Tualatin	Blake	\$ 4,500,000	2018-2024	Roads and Bridges
11419	Tualatin	Boones Ferry Road	\$ 1,000,000	2018-2024	Roads and Bridges
11421	Tualatin	Tualatin Rd	\$ 2,240,000	2018-2024	Roads and Bridges
11422	Tualatin	Tualatin-Sherwood Road	\$ 1,112,000	2018-	Roads and Bridges

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
				2024	
11423	Tualatin	Avery	\$ 3,600,000	2025-2032	Roads and Bridges
11424	Tualatin	Hazelbrook Road	\$ 3,543,000	2025-2032	Roads and Bridges
11425	Tualatin	Teton	\$ 1,773,000	2025-2032	Roads and Bridges
11430	Tualatin	Helenius	\$ 1,403,000	2033-2040	Roads and Bridges
11431	Tualatin	Norwood	\$ 2,824,000	2033-2040	Roads and Bridges
11553	Tualatin	Borland Rd	\$ 9,646,000	2018-2025	Roads and Bridges
11420	Tualatin	Nyberg	\$ 1,071,000	2017-2024	Roads and Bridges
10728	Tualatin	Boones Ferry	\$ 78,000	2014-2017	TSMO/TDM
10711	Tualatin	Teton	\$ 609,000	2014-2017	TSMO/TDM
11416	Tualatin	105th Ave/Avery Street	\$ 1,000,000	2014-2017	TSMO/TDM
11436	Wash Co, Tualatin & Wilsonv	East-West Arterial Overcrossing	\$ 38,000,000	2033-2040	Roads and Bridges
10610	Washington Co.	Saltzman Rd. Bike	\$ 1,000,000	2018-2024	Active Transportation
10611	Washington Co.	Locust Ave. Bike	\$ 3,417,000	2033-2040	Active Transportation
10612	Washington Co.	Greenburg Rd. Bike	\$ 3,610,000	2033-2040	Active Transportation
10613	Washington Co.	Cornell Rd. Bike	\$ 1,036,000	2033-2040	Active Transportation
10614	Washington Co.	Butner Rd. Bike	\$ 3,520,000	2033-2040	Active Transportation
10615	Washington Co.	Bronson Rd. Bike	\$ 5,490,000	2025-2032	Active Transportation
11089	Washington Co.	92nd Ave. Ped.	\$ 3,922,000	2033-2040	Active Transportation
11239	Washington Co.	Washington County Neighborhood Bikeways	\$ 16,000,000	2025-2032	Active Transportation
11240	Washington Co.	Murray Blvd. Bikelane & sidewalk	\$ 2,900,000	2014-2017	Active Transportation
11241	Washington Co.	Evergreen Rd. Bike Lanes	\$ 2,000,000	2014-2017	Active Transportation
11473	Washington Co.	111th / Rainmont Rd / 113th Ave	\$ 9,000,000	2025-2032	Active Transportation
10585	Washington Co.	Johnson St. Improvements	\$ 24,333,000	2033-2040	Active Transportation
10584	Washington Co.	Alexander St. Improvements	\$ 9,293,000	2025-2032	Active Transportation
11481	Washington Co.	Garden Home Rd Improvements	\$ 9,000,000	2033-2040	Active Transportation

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
11450	Washington Co.	Merlo Rd. Interim Bike Improvements	\$ 3,015,000	2018-2024	Active Transportation
11441	Washington Co.	TV Highway in Aloha-Reedville Safety and Operational Improvements	\$ 11,667,500	2014-2017	Active Transportation
10589	Washington Co.	95th Ave. Ped/Bike Connection	\$ 11,546,000	2025-2032	Active Transportation
11462	Washington Co.	Reedville Trail South Segment	\$ 5,640,000	2025-2032	Active Transportation
11461	Washington Co.	Reedville Trail North Segment	\$ 6,240,000	2025-2032	Active Transportation
11479	Washington Co.	Council Creek Trail: East-West Segment	\$ 20,100,000	2033-2040	Active Transportation
11483	Washington Co.	Turf-to-Surf Trail: South Hillsboro / Reedville Segment	\$ 5,600,000	2033-2040	Active Transportation
11484	Washington Co.	Westside Trail: Segment 2	\$ 4,300,000	2033-2040	Active Transportation
11468	Washington Co.	Washington County Pedestrian Arterial Crossings	\$ 3,585,000	2025-2032	Active Transportation
10606	Washington Co.	Washington Square Regional Center Pedestrian Improvements	\$ 8,954,000	2033-2040	Active Transportation
10607	Washington Co.	Sunset TC Station Community Pedestrian Improvements	\$ 6,006,000	2033-2040	Active Transportation
10608	Washington Co.	Aloha-Reedville Pedestrian Improvements	\$ 27,045,000	2025-2032	Active Transportation
11465	Washington Co.	Metzger Area	\$ 16,000,000	2025-2032	Active Transportation
11485	Washington Co.	North Hillsboro Active Transportation Connections	\$ 12,000,000	2033-2040	Active Transportation
10588	Washington Co.	Grahams Ferry Rd Improvements	\$ 28,000,000	2025-2032	Roads and Bridges
10545	Washington Co.	OR 10: Oleson Rd. Improvement	\$ 34,200,000	2018-2024	Roads and Bridges
10546	Washington Co.	170th Ave. Improvements	\$ 15,277,000	2025-2032	Roads and Bridges
10548	Washington Co.	174th Ave. Improvements	\$ 16,230,000	2033-2040	Roads and Bridges
10549	Washington Co.	Cornell @ 143rd Improvements	\$ 12,400,000	2033-2040	Roads and Bridges
10550	Washington Co.	185th Avenue Improvement	\$ 5,400,000	2018-2024	Roads and Bridges
10558	Washington Co.	Cornell Rd. Improvements	\$ 9,941,000	2018-2024	Roads and Bridges
10559	Washington Co.	Cornell Improvements	\$ 40,620,000	2033-2040	Roads and Bridges
10560	Washington Co.	Farmington Rd. Improvements	\$ 27,299,000	2025-2032	Roads and Bridges

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
10561	Washington Co.	Jenkins Rd. Improvements	\$ 15,530,000	2018-2024	Roads and Bridges
10563	Washington Co.	Kaiser/143rd Ave. Improvements	\$ 38,357,000	2033-2040	Roads and Bridges
10564	Washington Co.	Kaiser Improvements	\$ 6,100,000	2033-2040	Roads and Bridges
10565	Washington Co.	Springville Rd. Improvements	\$ 11,100,000	2018-2024	Roads and Bridges
10566	Washington Co.	Springville Rd. Improvements	\$ 3,600,000	2018-2024	Roads and Bridges
10567	Washington Co.	Taylor's Ferry Extension	\$ 4,390,000	2033-2040	Roads and Bridges
10569	Washington Co.	Walker Rd. Improvements	\$ 17,611,000	2025-2032	Roads and Bridges
10572	Washington Co.	Barnes Rd. Improvements	\$ 8,933,000	2014-2017	Roads and Bridges
10573	Washington Co.	Barnes Rd. Improvements	\$ 17,326,000	2033-2040	Roads and Bridges
10577	Washington Co.	Scholls Ferry Improvements	\$ 22,587,000	2033-2040	Roads and Bridges
10587	Washington Co.	Cornelius Pass Rd. Improvements	\$ 11,307,000	2018-2024	Roads and Bridges
10591	Washington Co.	Glencoe Rd. Improvements	\$ 26,016,000	2033-2040	Roads and Bridges
10592	Washington Co.	205th Ave. Improvements	\$ 31,000,000	2025-2032	Roads and Bridges
10598	Washington Co.	99W to I-5 Southern Arterial	\$ 53,000,000	2033-2040	Roads and Bridges
10708	Washington Co.	Roy Rogers Rd. / Tualatin-Sherwood Road	\$ 1,900,000	2014-2017	Roads and Bridges
10736	Washington Co.	124th Ave Extension	\$ 31,000,000	2014-2017	Roads and Bridges
11235	Washington Co.	Walker Rd. Improvements	\$ 33,000,000	2018-2024	Roads and Bridges
11236	Washington Co.	Cedar Hills Blvd. Improvements	\$ 4,000,000	2025-2032	Roads and Bridges
11237	Washington Co.	Barnes Rd Improvements	\$ 4,000,000	2025-2032	Roads and Bridges
10575	Washington Co.	West Union Rd.	\$ 26,192,000	2018-2024	Roads and Bridges
11478	Washington Co.	185th	\$ 57,000,000	2025-2032	Roads and Bridges
11472	Washington Co.	160th Ave Improvements	\$ 15,000,000	2025-2032	Roads and Bridges
11234	Washington Co.	Walker Rd. Improvements	\$ 16,600,000	2014-2017	Roads and Bridges
11476	Washington Co.	Saltzman Rd	\$ 8,000,000	2025-2032	Roads and Bridges
11463	Washington Co.	Thompson Rd Realignment	\$ 9,000,000	2025-2032	Roads and Bridges
10593	Washington Co.	Kinnaman Rd. Improvements	\$ 26,810,000	2033-2040	Roads and Bridges

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
11466	Washington Co.	Laidlaw Improvements	\$ 10,000,000	2025-2032	Roads and Bridges
11443	Washington Co.	Walnut St	\$ 4,000,000	2014-2017	Roads and Bridges
10579	Washington Co.	Barnes Rd. Improvements	\$ 4,000,000	2025-2032	Roads and Bridges
11464	Washington Co.	Jenkins Rd. Improvements	\$ 10,000,000	2025-2032	Roads and Bridges
11233	Washington Co.	Walker Rd. Improvements	\$ 13,570,000	2025-2032	Roads and Bridges
11486	Washington Co.	Roy Rogers Rd.	\$ 20,000,000	2033-2040	Roads and Bridges
10568	Washington Co.	Tualatin-Sherwood Rd. Improvements	\$ 49,150,000	2018-2024	Roads and Bridges
10582	Washington Co.	185th Ave. Improvements	\$ 12,163,000	2033-2040	Roads and Bridges
11448	Washington Co.	198th Ave. Improvements - South	\$ 27,900,000	2018-2024	Roads and Bridges
11477	Washington Co.	Kaiser	\$ 7,800,000	2025-2032	Roads and Bridges
11467	Washington Co.	Fischer Rd. Interim Bike and Pedestrian Improvements	\$ 4,580,000	2025-2032	Roads and Bridges
11447	Washington Co.	Baseline Rd Improvements	\$ 4,600,000	2014-2017	Roads and Bridges
11451	Washington Co.	Saltzman Rd	\$ 11,100,000	2018-2024	Roads and Bridges
11437	Washington Co.	Oleson Rd Bridge	\$ 5,800,000	2014-2017	Roads and Bridges
11455	Washington Co.	Brugger Rd	\$ 3,200,000	2018-2024	Roads and Bridges
10571	Washington Co.	West Union Rd. Improvements	\$ 34,870,000	2033-2040	Roads and Bridges
10547	Washington Co.	173rd/174th Under Crossing Improvement	\$ 58,640,000	2033-2040	Roads and Bridges
10590	Washington Co.	Tonquin Rd. Improvements	\$ 15,000,000	2025-2032	Roads and Bridges
11444	Washington Co.	Joss St	\$ 4,100,000	2014-2017	Roads and Bridges
11445	Washington Co.	P15 (Oats)	\$ 2,300,000	2014-2017	Roads and Bridges
11469	Washington Co.	124th Ave Improvements	\$ 14,000,000	2025-2032	Roads and Bridges
11456	Washington Co.	Shackelford Rd	\$ 12,000,000	2018-2024	Roads and Bridges
11458	Washington Co.	Shackelford Rd	\$ 18,100,000	2018-2024	Roads and Bridges
11459	Washington Co.	Shackelford Rd	\$ 9,900,000	2018-2024	Roads and Bridges
11470	Washington Co.	Basalt Creek E-W Connector	\$ 57,900,000	2025-2032	Roads and Bridges

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
11482	Washington Co.	West Union Rd. Interim Bike and Pedestrian Improvements	\$ 15,000,000	2025-2032	Roads and Bridges
11439	Washington Co.	Southbound Hwy 217 Allen/Denny Split Diamond Interchange	\$ 5,941,000	2014-2017	Roads and Bridges
10578	Washington Co.	Merlo/158th Improvements	\$ 24,735,000	2025-2032	Roads and Bridges
11453	Washington Co.	Jackson School Road	\$ 1,000,000	2018-2024	Roads and Bridges
11471	Washington Co.	Laidlaw Improvements	\$ 22,000,000	2025-2032	Roads and Bridges
11480	Washington Co.	185th Ave	\$ 14,700,000	2033-2040	Roads and Bridges
11452	Washington Co.	Scholls Ferry Rd. Improvements	\$ 4,300,000	2018-2024	Roads and Bridges
11460	Washington Co.	OR 10: Oleson Rd. Improvement	\$ 35,000,000	2025-2032	Roads and Bridges
11474	Washington Co.	113th Ave	\$ 6,000,000	2025-2032	Roads and Bridges
11457	Washington Co.	Shackelford Rd Bridge	\$ 14,600,000	2018-2024	Roads and Bridges
11438	Washington Co.	Tonquin / Grahams Ferry Intersection Improvements	\$ 3,353,000	2014-2017	Roads and Bridges
11238	Washington Co.	Cedar Mill Local Street Connectivity	\$ 10,000,000	2025-2032	Roads and Bridges
11442	Washington Co.	Cornell/Evergreen/229th Corridor Safety and Access to Transit	\$ 560,000	2014-2017	Transit
11440	Washington Co.	TV Hwy (and Canyon Rd) Corridor Safety and Access to Transit	\$ 1,614,000	2014-2017	Transit
11449	Washington Co.	TV Highway HCT Study	\$ 1,000,000	2018-2024	Transit
10605	Washington Co.	Hillsboro Area ITS	\$ 10,888,000	2018-2024	TSMO/TDM
11454	Washington Co.	Jackson School Road	\$ 1,000,000	2018-2024	TSMO/TDM
11446	Washington Co.	Tigard/Tualatin/Sherwood Area ITS	\$ 2,853,000	2014-2017	TSMO/TDM
11475	Washington Co.	Beaverton Area ITS	\$ 10,450,000	2025-2032	TSMO/TDM
10599	Washington Co. / Tigard	Hwy. 217/72nd Ave. Interchange Improvements	\$ 20,000,000	2018-2024	Roads and Bridges
10128	West Linn	Willamette Falls Dr./bicycle lanes and streetlights	\$ 7,800,000	2025-2032	Active Transportation
10129	West Linn	Willamette River Greenway Trail	\$ 2,000,000	2025-2032	Active Transportation
10127	West Linn	Hwy. 43 Improvements	\$ 21,400,000	2018-2024	Roads and Bridges

RTP ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Time Period	Metro Investment Category
10135	West Linn	19th St. Improvements	\$ 1,200,000	2025-2032	Roads and Bridges
10092	Wilsonville	Tonquin Trail	\$ 3,000,000	2018-2024	Active Transportation
10133	Wilsonville	French Prairie Bicycle/Pedestrian/Emergency Bridge	\$ 15,000,000	2018-2024	Active Transportation
11555	Wilsonville	Boeckman Creek Trail	\$ 1,950,000	2018-2024	Active Transportation
11554	Wilsonville	Barber St / Town Center Loop Bike/Pedestrian Bridge over I-5	\$ 7,000,000	2018-2024	Active Transportation
10130	Wilsonville	Kinsman Rd. Extension from Barber St. to Boeckman Rd.	\$ 6,069,000	2014-2017	Roads and Bridges
10131	Wilsonville	Tooze Rd. Improvements	\$ 3,800,000	2014-2017	Roads and Bridges
10132	Wilsonville	Boeckman Rd./I-5 Overcrossing Improvements	\$ 13,600,000	2018-2024	Roads and Bridges
10153	Wilsonville	Barber St. Extension from Kinsman Rd. to Villebois Village	\$ 8,900,000	2014-2017	Roads and Bridges
10156	Wilsonville	Boeckman Rd. at Boeckman Creek	\$ 5,800,000	2018-2024	Roads and Bridges
10853	Wilsonville	Kinsman Rd. Extension	\$ 10,400,000	2018-2024	Roads and Bridges
11243	Wilsonville	Day Rd. Improvements	\$ 14,000,000	2018-2024	Roads and Bridges
11556	Wilsonville	Stafford Rd. Improvements	\$ 12,000,000	2018-2024	Roads and Bridges
11557	Wilsonville	Brown Road Extension	\$ 15,200,000	2025-2032	Roads and Bridges
11487	Wilsonville	Boones Ferry Improvements	\$ 1,100,000	2025-2032	Roads and Bridges
11488	Wilsonville	Boones Ferry Road/Commerce Circle/95th Avenue	\$ 1,000,000	2025-2032	Roads and Bridges
11489	Wilsonville	Boones Ferry / I-5 ramp improvements	\$ 1,000,000	2025-2032	Roads and Bridges
11490	Wilsonville	Day Rd Overcrossing	\$ 44,100,000	2033-2040	Roads and Bridges
10134	Wilsonville	65th/Elligsen/Stafford Intersection Improvements	\$ 5,500,000	2017-2024	Roads and Bridges

Appendix B: 2015-2018 Metropolitan Transportation Improvement Program Projects Included in the Analysis

2015-2018 Metropolitan Transportation Improvement Program Projects Included in the Analysis – Federal and state funds only (organized alphabetically by nominating agency)

METRO ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Metro Investment Category
11379	Beaverton	Canyon Road Streetscape and Safety Project	\$ 3,535,000	Roads and Bridges
11503	Clackamas County	Jennings Ave: OR 99E to Oatfield Road Sidewalk and Bike Lanes	\$ 1,901,092	Active Transportation
70681	Clackamas County	Sunrise System: Industrial Area Freight Access and Multimodal Project	\$ 8,267,000	Roads and Bridges
70047	Clackamas County	OR213 Harmony Sunnyside Rds Sidewalk/Sig Impv	\$ 1,186,843	Active Transportation
70645	Clackamas County	Sunnyside Rd Adaptive Signal System	\$ 440,000	Roads and Bridges
10020	Clackamas County	Clackamas County ITS Plan Phase 2B	\$ 1,230,000	Roads and Bridges
70478	Clackamas County	Clackamas County Regional Freight ITS Project	\$ 1,068,997	Roads and Bridges
70007	Fairview	40 Mile Loop: Blue Lake Park - Sundial Rd	\$ 1,749,943	Active Transportation
10780	Forest Grove	OR8 & OR47: Pacific Ave & Quince St	\$ 984,392	Roads and Bridges
70580	Forest Grove	B Street: 23rd Ave - Primrose Lane	\$ 228,562	Active Transportation
70682	Gladstone	Trolley Trail Historic Bridge Feasibility Study: Gladstone to Oregon City	\$ 201,892	Active Transportation
10443	Gresham	Sandy Boulevard: NE 181st Avenue to East Gresham City Limits	\$ 3,583,100	Roads and Bridges
70609	Gresham	East Metro Connections ITS	\$ 576,866	Roads and Bridges
10081	Happy Valley	SE 129th Avenue - Bike Lane and Sidewalk Project	\$ 3,105,645	Active Transportation
70688	Hillsboro	US 26/Brookwood Interchange Industrial Access Project	\$ 8,267,000	Roads and Bridges
99923	King City	King City Sidewalk Infill	\$ 913,836	Active Transportation
99924	Lake Oswego	Boones Ferry Rd: Oakridge/Reese-Madrona St	\$ 4,000,000	Active Transportation
70774	Metro	Willamette Greenway Trail: Columbia Blvd Bridge	\$ 1,580,511	Active Transportation
99901	Metro	Regional Freight Analysis and Project Development	\$ 500,000	Regional Program
11054	Metro	Regional Travel Options Program	\$ 8,747,874	Regional Program

METRO ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Metro Investment Category
11103	Metro	Regional Planning	\$ 4,764,257	Regional Program
11104	Metro	Regional TSMO Program	\$ 4,695,000	Regional Program
70495	Metro	Corridor & Systems Planning	\$ 2,045,000	Regional Program
70496	Metro	Metropolitan Mobility Funding Preparedness	\$ 1,000,000	Regional Program
10855	Metro	Transit Oriented Development Program	\$ 6,140,839	Regional Program
10104	Milwaukie	17th Avenue Multi-use Trail: SE Ochoco - SE McLoughlin	\$ 2,000,000	Active Transportation
11373	Multnomah County	NE 238th Dr: NE Halsey St - NE Glisan St	\$ 9,557,010	Roads and Bridges
10387	Multnomah County	Arata Rd - 223rd - 238th (Fairview/Wood Village)	\$ 2,971,820	Active Transportation
10410	Multnomah County	Broadway Bridge - Willamette River	\$ 7,537,320	Roads and Bridges
70485	Multnomah County	Sandy Blvd: NE 230th Ave - NE 238th Dr	\$ 434,000	Roads and Bridges
99902	ODOT	OR8 at SE 44th and SE 45th Ave	\$ 464,789	Roads and Bridges
99905	ODOT	OR213: SE Clay St - SE Mill St	\$ 1,003,289	Active Transportation
99916	ODOT	US26: Ross Island Intchg NB Conn Deck Overlay	\$ 1,131,495	Roads and Bridges
99908	ODOT	OR 213 (82nd Ave): King Rd	\$ 237,928	Roads and Bridges
99909	ODOT	I-5: N Denver Ave NB Tunnel Illumination	\$ 296,026	Roads and Bridges
99911	ODOT	OR99E Railroad Tunnel Illumination	\$ 1,740,762	Roads and Bridges
99913	ODOT	OR217: SW Allen Blvd & SW Denny Rd Intrchgs	\$ 183,946	Roads and Bridges
99915	ODOT	I-5: Morrison Interchange Ramps Deck Seal	\$ 904,478	Roads and Bridges
99919	ODOT	I-205: Johnson Creek - Glenn Jackson Bridge	\$ 10,144,200	Roads and Bridges
99922	ODOT	US26: Cornelius Pass Rd - NW 185th Ave	\$ 9,794,600	Roads and Bridges
70472	ODOT	FFO OR99W: Tualatin River Bridge #01417S Rehab	\$ 2,502,570	Roads and Bridges
70558	ODOT	OR8: SW 185th Ave & 192nd Ave	\$ 3,390,929	Roads and Bridges
11401	ODOT	I-5: SB Aux Lane at Lower Boones Ferry Rd	\$ 3,953,303	Roads and Bridges
11439	ODOT	OR217: Allen-Denney Southbound Split Diamond	\$ 5,330,744	Roads and Bridges
11583	ODOT	I-5: NB Lower Boones Ferry Exit Ramp	\$ 1,129,167	Roads and Bridges
70784	ODOT	I-5 Rose Quarter Development	\$ 1,459,499	Roads and Bridges

METRO ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Metro Investment Category
70380	ODOT	OR213: Intersection Improvements Couch - Division	\$ 2,368,210	Active Transportation
70761	ODOT	OR212: SE Richey Rd - US26	\$ 2,624,407	Roads and Bridges
70786	ODOT	US26 ATMS/ITS	\$ 583,245	Roads and Bridges
70766	ODOT	OR8: MP 1.5 - MP 16.67	\$ 1,729,126	Roads and Bridges
70783	ODOT	I-205: I-84 - SE Stark/Washington Street	\$ 681,099	Roads and Bridges
70785	ODOT	OR224/OR212 Corridor ITS	\$ 134,595	Roads and Bridges
70754	ODOT	I-5 Bridge Over NE Hassalo & NE Holladay	\$ 2,182,234	Roads and Bridges
99912	ODOT	OR213 Operational Improvements	\$ 5,093,075	Roads and Bridges
99903	ODOT	OR8 at OR219 (Hillsboro)	\$ 461,100	Roads and Bridges
99904	ODOT	OR213: NE Couch St - SE Pine Street	\$ 819,772	Active Transportation
99910	ODOT	OR8 Operational Improvements	\$ 865,446	Roads and Bridges
70562	ODOT	OR 213 (82nd Ave): Causey Ave	\$ 151,241	Roads and Bridges
70560	ODOT	OR 213 (82nd Ave): Sandy Blvd	\$ 725,771	Active Transportation
70561	ODOT	OR 213 (82nd Ave): SE Duke Street	\$ 780,449	Active Transportation
70565	ODOT	OR 213 (82nd Ave) Sunnyside Rd	\$ 153,085	Roads and Bridges
70564	ODOT	OR224: SE 135th Ave	\$ 368,880	Roads and Bridges
70373	ODOT	US26: Springwater At-Grade Intersection	\$ 1,211,355	Roads and Bridges
70554	ODOT	2014 & 2015 Signal Upgrades	\$ 1,407,936	Roads and Bridges
70557	ODOT	Slides/Rockfalls - Rockfall Investigations	\$ 179,460	Roads and Bridges
70653	ODOT	Regional ITS Communications Infrastructure (ODOT)	\$ 530,000	Roads and Bridges
11567	Port of Portland	Downtown I-405 Ped Safety and Ops Imprvmnts	\$ 2,009,953	Active Transportation
11568	Port of Portland	St Johns Truck Strategy Phase II	\$ 3,002,356	Roads and Bridges
70686	Port of Portland	Troutdale Industrial Access Project	\$ 8,000,000	Roads and Bridges
10336	Port of Portland	NE Columbia Blvd: Cully Blvd and Alderwood Rd	\$ 4,959,856	Roads and Bridges
11566	Port of Portland	Connected Cully	\$ 2,994,624	Active Transportation
10184	Portland	Foster Road: SE Powell Boulevard to SE 90th Avenue: Pedestrian/Bicycle Phase 2	\$ 2,063,400	Active Transportation

METRO ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Metro Investment Category
11564	Portland	OR 99W: SW 19th Avenue to SW 26th (Portland) Barbur Boulevard Demonstration	\$ 1,794,000	Active Transportation
10187	Portland	Foster Road Streetscape: SE 50th - SE 84th	\$ 1,250,000	Active Transportation
10218	Portland	Burgard/Lombard @ North Time Oil Road Intersection	\$ 1,643,000	Roads and Bridges
11196	Portland	East Portland Active Transportation to Transit	\$ 3,323,000	Active Transportation
70004	Portland	Twenties Bikeway: NE Lombard - SE Harney Drive	\$ 1,829,577	Active Transportation
70646	Portland	N/NE Columbia Blvd Traffic/Transit Signal Upgrade	\$ 350,000	Roads and Bridges
70063	Portland	Marine Dr. Path: NE Ave-NE 185th Ave	\$ 715,653	Active Transportation
70005	Portland	Red Electric Trail: SW 30th - SW Vermont	\$ 1,359,410	Active Transportation
70062	Portland	Springwater Trail: Various SE Intersections	\$ 510,432	Active Transportation
70639	Portland	Springwater Trail Gap: SE Umatilla - SE 13th Ave	\$ 787,453	Active Transportation
70110	Portland	NE Columbia Blvd at MLK Jr. Blvd	\$ 1,014,263	Active Transportation
11560	Portland	Portland Central City Multimodal Safety Project - Phase 2	\$ 5,500,000	Active Transportation
11565	Portland	East Portland Access to Employment and Education Multimodal Project	\$ 8,267,000	Active Transportation
11561	Portland	South Rivergate Freight Project	\$ 3,222,000	Roads and Bridges
11563	Portland	Southwest in Motion (SWIM)	\$ 272,000	Active Transportation
11562	Portland	N. Going to the Island Freight Project	\$ 500,000	Roads and Bridges
70415	PSU	PORTAL Archived Data User Services - 2015	\$ 125,000	Regional Program
10701	Sherwood	Cedar Creek/Tonquin Trail: OR99W - Murdock Rd.	\$ 3,392,961	Active Transportation
70501	SMART	SMART Preventive Maintenance FY15	\$ 350,000	Transit
70503	SMART	SMART Bus/Rail Transit Enhancements FY15	\$ 3,500	Transit
70505	SMART	SMART Job Access/Reverse Commute FY15	\$ 8,000	Transit
70507	SMART	SMART New Freedom Program FY15	\$ 8,000	Transit
70702	SMART	Wilsonville SMART Employer Program - 2015	\$ 74,407	Active Transportation

METRO ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Metro Investment Category
70716	SMART	5307 Bus Capital & PM FY 16	\$ 1,420,000	Transit
70719	SMART	5307 FY16 Associated Transit Improvements (1%)	\$ 14,200	Transit
70723	SMART	5310 FY15 - Senior & Disabled	\$ 149,000	Transit
70728	SMART	5339 FY15 - Bus and Bus Facilities (Capital)	\$ 250,000	Transit
70690	Tigard	Fanno Creek Trail: Woodward Park to Bonita Road and 85th Avenue to Tualatin Brdg	\$ 4,350,000	Active Transportation
70594	Tigard	Main St Ph2: Rail Corridor-Scoffins	\$ 684,424	Active Transportation
11414	TriMet	Powell-Division Corridor Safety & Access to Transit	\$ 2,512,440	Active Transportation
70521	TriMet	Portland to Milwaukie Light Rail	\$ 400,000,000	Transit
11412	TriMet	OR99W: Corridor Safety and Access to Transit	\$ 3,366,987	Active Transportation
11415	TriMet	OR8 Corridor Safety and Access to Transit	\$ 1,448,242	Active Transportation
70492	TriMet	2015 TriMet Preventative Maintenance (TOD)	\$ 2,975,000	Transit
70511	TriMet	TriMet Rail Prev Maint (Reg Transit Bond Pmt)	\$ 5,000,000	Transit
70515	TriMet	2015 Trimet Enhance Mobility Program	\$ 8,079,630	Transit
70517	TriMet	TriMet Bus/Rail Transit Enhancements (FY15)	\$ 379,369	Transit
70525	TriMet	Bus & Rail Preventive Maintenance (FY15)	\$ 212,177,562	Transit
70527	TriMet	Rail Preventive Maintenance (FY15)	\$ 18,500,000	Transit
70529	TriMet	2015 Regional High Capacity Transit Bond Payment	\$ 58,000,000	Transit
70596	TriMet	2014 TriMet Preventative Maintenance (Intertwine Trail)	\$ 220,135	Transit
70628	TriMet	2015 State of Good Repair Program	\$ 1,340,000	Transit
70637	TriMet	2015 TriMet Bus and Bus Facilities	\$ 2,900,000	Transit
70732	TriMet	Bus Purchase (5339 Funds)	\$ 9,794,779	Transit
70738	TriMet	FY16 TM Bus/Rail Transit Enhancements	\$ 1,152,898	Transit
70689	Tualatin Hills PRD	Beaverton Creek Trail Crescent Connection: Westside Trail to SW	\$ 800,000	Active Transportation

METRO ID	Nominating Agency	Project Name	Estimated Cost (\$2014)	Metro Investment Category
		Hocken Avenue		
70010	Tualatin Hills PRD	Westside Trail: Rock Creek Trail - Bronson Creek Trail	\$ 1,619,924	Active Transportation
70654	Washington County	Cornell Rd/Cornelius Pass Rd Adaptive System*	\$ -	Roads and Bridges
11468	Washington County	Washington County Arterial Pedestrian Crossings	\$ 636,000	Active Transportation
11438	Washington County	Tonquin Road / Grahams Ferry Road Intersection Project	\$ 2,132,000	Roads and Bridges
70417	Washington County	SW Oleson Road: Fanno Creek Bridge	\$ 3,230,387	Roads and Bridges

*Denotes project programmed the federal fund in years prior to 2015. Funds for this project programmed in fiscal years 2015-2018 are local funds.

Appendix C: Technical Survey Questions and Results

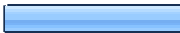
Environmental Justice and Title VI Analysis for the SurveyMonkey

2016-2018 MTIP and 2014 RTP Update

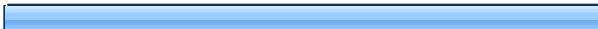
1. What is the name of the agency, organization or group you represent?

	Response Count
	19
answered question	19
skipped question	0

2. What type of agency, organization or group do you represent?

		Response Percent	Response Count
Local government department/bureau/		21.1%	4
State government department		26.3%	5
Transit agency or paratransit provider		10.5%	2
Community organization		21.1%	4
Technical or policy advisory committee		5.3%	1
other (please explain)		15.8%	3
	answered question		19
	skipped question		0

3. What environmental justice communities does your agency, organization or group serve/represent? (check all that apply)

		Response Percent	Response Count
African American		89.5%	17
Asian		78.9%	15
Native American and/or Alaskan Native		73.7%	14
Native Hawaiian and or other Pacific Islander		68.4%	13
Hispanic/Latino		89.5%	17
Immigrants		73.7%	14
Limited English Proficiency		84.2%	16
Elderly/Seniors		89.5%	17
Youth		89.5%	17
Transit Dependent		84.2%	16
Low-Income		84.2%	16
Specific Neighborhood (e.g. St. Johns)		31.6%	6
other (please specify)		21.1%	4
answered question			19
skipped question			0

4. Contact information (optional)

		Response Percent	Response Count
First name		100.0%	13
Last name		100.0%	13
Street address		92.3%	12
City		92.3%	12
State		92.3%	12
ZIP code		92.3%	12
Phone		76.9%	10
E-mail		92.3%	12
answered question			13
skipped question			6

5. Proposed definition: Minority Persons who identify as any of the following races: Black or African American, American Indian or Alaska Native, Asian, Native Hawaiian or other Pacific Islander, some other race or multiple races AND persons who identify ethnically as Hispanic or Latino in the 2010 U.S. decennial census. (Hispanic or Latino is defined as a person of Cuban, Mexican, Puerto Rican, South or Central American or other Spanish culture or origin regardless of race. Origin can be viewed as the heritage, nationality group, lineage or country of birth of the person or the person's parents or ancestors before their arrival in the United States. People who identify their origin as Spanish, Hispanic or Latino may be of any race.)

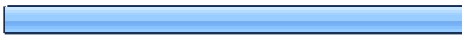
		Response Percent	Response Count
Support		56.3%	9
Don't support		18.8%	3
Don't know		25.0%	4

Whether you support, don't support, or don't know, what other feedback should be considered?

13

answered question	16
skipped question	3

6. Proposed definition: Limited English Proficiency Persons who identify in the U.S. Census Bureau's American Community Survey as speaking English "less than very well."

		Response Percent	Response Count
Support		68.8%	11
Don't support		6.3%	1
Don't know		25.0%	4

Whether you support, don't support or don't know, what other feedback should be considered?

9

answered question	16
skipped question	3

7. Proposed definition: Elderly/Senior Persons who are 65 years of age or older as of the U.S. Census Bureau's 2010 census.

		Response Percent	Response Count
Support		100.0%	16
Don't support		0.0%	0
Don't know		0.0%	0

Whether you support, don't support or don't know, what other feedback should be considered?

4

answered question	16
skipped question	3

8. Proposed definition: Youth Persons who are 17 years of age or younger as of the U.S. Census Bureau's 2010 census.

		Response Percent	Response Count
Support		87.5%	14
Don't support		12.5%	2
Don't know		0.0%	0

Whether you support, don't support or don't know, what other feedback should be considered?

3

answered question	16
skipped question	3

9. Choose one of the three definitions for low-income persons. Each definition is determined by the U.S. Department of Health and Human Services (DHHS) Poverty Guidelines with the demographic information from the U.S. Census Bureau. The DHHS Poverty Guideline factors in poverty status in relation to family income, family size and basic standard of living. Choose one of the three definitions for low-income persons. As determined by the U.S. Department of Health and Human Services Poverty Guidelines:

		Response Percent	Response Count
persons in a household living 200% of the federal poverty guidelines		18.8%	3
persons in a household living 185% of the federal poverty guidelines (This is the threshold for being eligible for certain services, including the Supplemental Nutrition Assistance Program (SNAP).)		43.8%	7
persons in a household living 150% of the federal poverty guidelines		37.5%	6

Why did you choose this definition, and what other feedback should be considered?

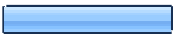
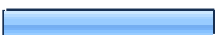
12

answered question	16
skipped question	3

10. For locating concentrations of minority communities in the region, which threshold should be used?

		Response Percent	Response Count
Census blocks where the total minority population (by percent) of the census block is greater than the region's total average minority population (by percent). The regional average is estimated at 33%. [source: other regions/Metro benefits and burdens analysis]		60.0%	9
Census blocks where the total minority population (by percent) is greater than one standard deviation of the region's total average minority population (by percent) For the Metro region, one standard deviation greater than the regional average is estimated at 36%. [source: other regions/Metro benefits and burdens analysis]		40.0%	6
Why did you choose this threshold, and what other feedback should be considered?			14
answered question			15
skipped question			4

11. For locating concentrations of Limited English Proficiency (LEP) communities in the region, do you support the following proposed threshold be used: "Regardless of language, census tracts with that have more than an 8.71% LEP population." The 8.71% represents the Metro region's total average of over-5 years of age population who "do not speak English very well" regardless of native language. [source: Metro LEP analysis.]"

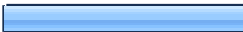
		Response Percent	Response Count
Support		43.8%	7
Don't support		25.0%	4
Don't know		31.3%	5

Whether you support, don't support, or don't know, what other feedback should be considered?

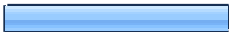
10

answered question	16
skipped question	3

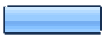
12. For locating concentrations of elderly/senior communities in the region, which threshold should be used?

		Response Percent	Response Count
Census block groups where the total elderly/senior population (by percent) of the census block group is greater than the region's total average elderly/senior population (by percent). The regional average is estimated at 10.2%. [source: other regions/Metro benefits and burdens analysis]		64.3%	9
Census block groups where the total elderly/senior population (by percent) is greater than one standard deviation of the region's average elderly/senior population (by percent). For the Metro region one standard deviation greater than the regional average is estimated at 10.3%. [source: other regions/Metro benefits and burdens analysis]		35.7%	5
Why did you choose this threshold, and what other feedback should be considered?			11
answered question			14
skipped question			5

13. For locating concentrations of youth communities in the region, which threshold should be used?

		Response Percent	Response Count
Census block group where the total youth population (by percent) of the census block group is greater than the region's total average youth population (by percent). The regional average is estimated at 22%. [source: other regions/Metro benefits and burdens analysis]		66.7%	10
Census block group where the total youth population (by percent) is greater than one standard deviation of the region's total youth population (by percent). For the Metro region one standard deviation greater than the regional average is estimated at 23%. [source: other regions/Metro benefits and burdens analysis]		33.3%	5
Why did you choose this threshold, and what other feedback should be considered?			11
		answered question	15
		skipped question	4

14. For locating concentrations of low-income communities in the region, which threshold should be used? The definition for identifying a person or household as low-income would come from responses to question 9 of this survey.

		Response Percent	Response Count
Census tracts where the total low-income population (by percent) the census tract is greater than the region's total average low-income population (by percent).		57.1%	8
Census tracts where 20% or more of the population are below the poverty guideline as defined by question 9 (200, 185, or 150 percent of federal poverty guidelines).		14.3%	2
Census tracts where the total low-income population (by percent) of the census tract is one standard deviation greater than the region's total average low-income population (by percent).		14.3%	2
Census block groups where the per capita income is lower than the one person poverty guideline from the U.S. Department of Health and Human Services Department. For reference, the one person poverty guideline for 2014 is \$11,670.		14.3%	2
Why did you choose this threshold, and what other feedback should be considered?			10
answered question			14
skipped question			5

15. Three categories are being proposed to classify investments: • Roads and bridges • Transit • Bicycle and pedestrian Do you support this framework for a programmatic analysis?"

		Response Percent	Response Count
Support		43.8%	7
Don't support		50.0%	8
Don't know		6.3%	1

Whether you support, don't support or don't know, what other feedback should be considered?

11

answered question	16
skipped question	3

16. Based on the proposed investment categories, what are three benefits and burdens environmental justice communities experience with these programmatic investments (e.g. roadway, transit, bicycle/pedestrian) that should be considered more closely?

	Response Count
	16
answered question	16
skipped question	3

Page 3, Q5. Proposed definition: Minority

Persons who identify as any of the following races: Black or African American, American Indian or Alaska Native, Asian, Native Hawaiian or other Pacific Islander, some other race or multiple races AND persons who identify ethnically as Hispanic or Latino in the 20...

1	I support the definition but I recommend that the term "minority" be used sparingly. "Minority" conveys an idea of "the lesser" and masks the importance of race. I would recommend using "Communities of Color" in the place of "minority" when possible.	Feb 7, 2014 11:00 AM
2	Can you use the terminology Minority Race to clarify that you are looking at racial minorities and not other minorities (ie: sexual orientation)	Feb 5, 2014 2:12 PM
3	Are you attempting to identify all non-white minority populations or just all minority/ethnicity populations? What about individuals with Indian/Pakistani heritage? Are they Asian? Why only one ethnic group--Hispanics? Our region contains many Bosnian, Serbs and Croats who are ethnically a minority within our community. I do not believe the Somali population fits well into the African American category--nor does lumping all of the African immigrants under the rubric of "black" serve their interests, housing patterns or transportation needs well.	Feb 4, 2014 1:43 PM
4	Some ethnicities (those from Middle Eastern or Slavic countries) may be "white on paper," but their actual experience may be closer to that of what we typically consider "minorities." They may not identify as "white/caucasian" nor "some other race" under this scheme.	Jan 29, 2014 11:42 AM
5	Are those from Portugal included in this definition?	Jan 29, 2014 10:03 AM
6	Could be a general statement: if you feel disenfranchised and underrepresented, then you could fit the definition of minority.	Jan 28, 2014 5:25 PM
7	METRO's approach in reaching the Latino community is to treat all with respect and sensitivity; not as experts but as facilitators and partners. This approach acknowledges social and cultural context, and that all communities have assets. It means understanding that individuals in low-income communities share the same aspirations for their children and neighborhoods as their counterparts in more affluent neighborhoods. And it means eliciting and honoring their views about priorities for - and approaches to - change in our communities.	Jan 28, 2014 2:47 PM
8	I tend to think protected classes should be added such as religious and LGBT minorities plus handicapped populations.	Jan 28, 2014 2:23 PM
9	Minority is the wrong word. You shouldn't use it at all because it is relative. By 2040 the notion of minority propulations will be different. Instead you should be focused on language that provides framing and perspective. Use words like "historically undeserved", "historically underresourced", "communities with barriers to resource" I wouldn't use the term minority at all because it also implies a continuance of a social status that is "less than" and it asserts continued marginalization implicitly. World wide there are more brown people anyway so...minority?	Jan 28, 2014 10:31 AM
10	1. RTitle VI provides protection based on perceived race or national origin, not just actual. So while the analysis focuses on actual minority status, Metro's	Jan 28, 2014 10:13 AM

Page 3, Q5. Proposed definition: Minority

Persons who identify as any of the following races: Black or African American, American Indian or Alaska Native, Asian, Native Hawaiian or other Pacific Islander, some other race or multiple races AND persons who identify ethnically as Hispanic or Latino in the 20...

outreach practices need to address perceived minority status as well. 2. Hispanic and Latino are not synonymous. "Hispanic" refers to ethnic origins in a Spanish-speaking country, while "Latino" refers to ethnic origins in Latin or South America. Only the former term includes someone from Spain; only the latter term includes someone from Haiti or Brazil. Please make sure the final analysis and guidance uses them correctly, differentiating where appropriate.

- | | | |
|----|---|----------------------|
| 11 | Seems like should potentially also include eastern European immigrants in practice (e.g. other groups prominent in the Portland Metro area) | Jan 28, 2014 9:40 AM |
| 12 | The above definition discusses race/ethnicity but doesn't touch on what makes someone a "minority". Are you saying that just because they are in these race/ethnicity categories they are a minority? I associate minority with a number / percentage. | Jan 28, 2014 9:06 AM |
| 13 | We are including African as well as African American in our data collection. We have heard from the community that this is an important distinction. we are moving away from Minority as a category and in our work, and toward persons of color. When we met with the CCC the categories they supported were African African American American Indian or Alaskan Native Asian Latino/Hispanic Middle Eastern/North African Pacific Islander Slavic White | Jan 27, 2014 5:23 PM |

Page 3, Q6. Proposed definition: Limited English Proficiency

Persons who identify in the U.S. Census Bureau's American Community Survey as speaking English "less than very well."

1	Identify within these groups the amount of people who are literate in their own native language.	Feb 4, 2014 1:43 PM
2	Undercounting of certain LEP populations (i.e. refugees) due to fear of institutions and/or misunderstanding.	Jan 29, 2014 11:42 AM
3	How do you define "less than very well"?	Jan 28, 2014 5:25 PM
4	METRO needs to understand that members of these populations have been the fastest growing segment of the population served by METRO for more than a decade and will continue to be in the foreseeable future. Yet they remain the most ignored group in policy making decisions by Metro. Many of the policy changes being considered need to include ELP members in the decision making bodies or continuing to ignore this growing population segment will exacerbate their plight of exclusion.	Jan 28, 2014 2:47 PM
5	I suggest "less than well" is a more appropriate definition.	Jan 28, 2014 2:23 PM
6	This may not be in your control but "less than very well" seems rather subjective. If this is what the USCB gives out and you have to use it then do what you have to!	Jan 28, 2014 10:31 AM
7	School programs	Jan 28, 2014 9:40 AM
8	What are the other categories that people can choose from? "Less than very well" can still be average.	Jan 28, 2014 9:06 AM
9	We are also trying to incorporate lanageas spoken at home, which is consistent with PPS.	Jan 27, 2014 5:23 PM

Page 3, Q7. Proposed definition: Elderly/Senior

Persons who are 65 years of age or older as of the U.S. Census Bureau's 2010 census.

1	I support the definition but I recommend that the terms "Elderly" and "Senior" be used sparingly. I would recommend using "older adults" or "adults aged 65 and older" when possible.	Feb 7, 2014 11:00 AM
2	Break down by gender and disability status. This will encourage rational planning policies that address the transportation needs of this group in a better way.	Feb 4, 2014 1:43 PM
3	Staff who work with elders at IRCO have identified an issue where an immigrant/refugee's official paperwork may indicate that they are younger than they actually are, thereby excluding them from certain benefits. This occurs because they are often advised that they will not be able to find work upon coming to the U.S. unless they are younger.	Jan 29, 2014 11:42 AM

Page 3, Q7. Proposed definition: Elderly/Senior

Persons who are 65 years of age or older as of the U.S. Census Bureau's 2010 census.

4	Pretty universal definition on this subject.	Jan 28, 2014 5:25 PM
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Page 3, Q8. Proposed definition: Youth

Persons who are 17 years of age or younger as of the U.S. Census Bureau's 2010 census.

1	Both lower and upper limits, i.e. 6-17 years of age.	Jan 29, 2014 11:42 AM
2	Pretty universal definition on this subject.	Jan 28, 2014 5:25 PM
3	It should include persons who are 24 years of age or younger. Youth unemployment statistics by the federal government go up to age 26.	Jan 27, 2014 5:06 PM

Page 3, Q9. Choose one of the three definitions for low-income persons. Each definition is determined by the U.S. Department of Health and Human Services (DHHS) Poverty Guidelines with the demographic information from the U.S. Census Bureau. The DHHS Poverty Guideline factors in poverty status in relation to...

1	Research shows that families with incomes between 100% and 200% of the poverty level face material hardships and financial pressures similar to families 200% below the federal poverty guidelines. Research also suggests that to meet their basic needs, families actually need an income of roughly twice the official poverty level.	Feb 7, 2014 11:00 AM
2	I don't have a strong knowledge of these definitions, I choose 185% because it's a threshold for other services.	Feb 5, 2014 2:12 PM
3	Seek to correlate poverty definition with a federal program in order to leverage data collection and mapping efforts.	Feb 4, 2014 1:43 PM
4	This definition will tend to focus the identification of low-income persons on the "most needy" This is not to say that households below the 200% threshold do not face difficult economic circumstances.	Jan 29, 2014 2:21 PM
5	To keep as much consistency as possible between programs.	Jan 29, 2014 11:42 AM
6	Definition should include demographic variances such as elderly vs. youth to determine guidelines.	Jan 29, 2014 10:03 AM
7	Lowest standard possible--don't make the bar too high.	Jan 28, 2014 5:25 PM
8	In November 2012 the U.S. Census Bureau said more than 16% of the population lived in poverty in the United States, including almost 20% of American children. The data is especially grim for the state of Oregon, where the Census Bureau identified nearly 600,000 Oregonians of all ages who were living in poverty. This represented 15.8 percent of the state's population, but was especially tough on our children, with an estimated 21.7 percent of Oregon children under the age of 18 reportedly living in poverty.	Jan 28, 2014 2:47 PM
9	No particular reason. I can't claim my response is well informed.	Jan 28, 2014 2:23 PM
10	Prosperity gap is widening and we need to make sure we are able to meet the needs of hardworking families that are struggling to make ends meet.	Jan 28, 2014 10:31 AM
11	Chose 185% as it's being used as an eligibility criteria and is a moderate definition, but this isn't my area of expertise and other folks from ODOT (my agency) may have more educated recommendations.	Jan 28, 2014 10:13 AM
12	More inclusive	Jan 28, 2014 9:40 AM

Page 4, Q10. For locating concentrations of minority communities in the region, which threshold should be used?

1	I believe above regional average is a good estimation.	Feb 7, 2014 11:04 AM
2	Not entirely sure, but I'm assuming that 36% would be more inclusive.	Feb 5, 2014 2:14 PM
3	This question could be better answered if there was more information as to what the scientific meaning of "one standard deviation" is--is this statistically significant in that such an out come would not occur but for other factors?--like discrimination or an inefficient, ineffective transportation system? Why do statististions, map mappers, historians and economists use standard deviations?	Feb 4, 2014 1:54 PM
4	Includes more communities.	Feb 4, 2014 10:07 AM
5	Thjis standard uses a measure of approximately 10% greater than the average -- most analysis of concentrations of populatoins that I have seen use some measure that is higher than the "regional" average. This measure may under identify minority populations.	Jan 29, 2014 2:41 PM
6	The more inclusive option seems prudent to "play it safe" when it comes to identifying populations and preventing discrimination. Also worth considering is areas that have experienced displacement of minorities, and focusing on the minorities still remaining there. The % may be below average, but perhaps historically it wasn't and further burdens should be prevented.	Jan 29, 2014 11:53 AM
7	Consider variation in minority demographics.	Jan 29, 2014 10:16 AM
8	Oregon's numbers are nowhere near the national levels, as it remains among the 10 whitest states in the union. But Oregon's social and economic fortunes are increasingly tied to the civic, cultural and business inclusion of its minority citizens, whose surge in population has been dramatic over the past two decades. As of 2010, nearly one in seven Oregonians were classified as Latino. The shift will redefine the State going forward, as the growing number of newborn and young ethnic citizens are tomorrow's voters and keepers, if you will, of the current white franchise. or Asian, reports the Immigration Policy Center in Washington, D.C.	Jan 28, 2014 2:56 PM
9	Setting the threshold at any amount above the mean strikes me as being too sensitive.	Jan 28, 2014 2:35 PM
10	I think a more inclusive threshold is appropriate, given systematic undercounting of minorities in the census.	Jan 28, 2014 10:36 AM
11	Because its better. You need to strike the term Minority populations from you lexicon.	Jan 28, 2014 10:34 AM
12	easier to understand	Jan 28, 2014 9:43 AM
13	It is simpler to explain.	Jan 28, 2014 9:16 AM
14	I think these are too high, I am not sure it makes sense to use the regional average.	Jan 27, 2014 5:27 PM

Page 4, Q11. For locating concentrations of Limited English Proficiency (LEP) communities in the region, do you support the following proposed threshold be used: "Regardless of language, census tracts with that have more than an 8.71% LEP population." The 8.71% represents the Metro region's total average of o...

1	I would also recommend looking at the number of languages spoken at each school to help triangulate concentration of LEP communities.	Feb 7, 2014 11:04 AM
2	Title VI guidance requires language assistance to any language group who is less than 5% of the population. Use this number because it is the trigger for the safe harbour provisions.	Feb 4, 2014 1:54 PM
3	This measure does not necessary work well Title VI requirement to identify specific populations that are LEP -- I believe that the threshold is more than 5% in a particular language	Jan 29, 2014 2:41 PM
4	If there were a way to identify concentrations at a more fine-grained level, that would be ideal...however, I realize that the tract is the smallest geographic unit available for Census LEP data.	Jan 29, 2014 11:53 AM
5	Within the region, understand the age variations within the areas so future educational opportunities can be considers that aid English proficiency.	Jan 29, 2014 10:16 AM
6	Need to be changed regularly.	Jan 28, 2014 2:56 PM
7	This definition is in line with federal DOT guidance. Still, Metro might be better off using a combination of a % threshold and an absolute # threshold (# LEP individuals/area, regardless of their proportion in the overall population). A % threshold alone may suggest a relatively high LEP proportion if the block has so few residents that data are easily skewed (something like this happened in a recent project where there were less than 10 HHs in an industrial area, and 2 were AAPI). An area with a high population density of LEP individuals may still need LEP-specific outreach, even if it does not exceed regional averages.	Jan 28, 2014 10:36 AM
8	The number is almost surely higher than what is reported here.	Jan 28, 2014 10:34 AM
9	I would need to see what it looks like on a map.	Jan 28, 2014 9:16 AM
10	School district data should be considered also.	Jan 27, 2014 5:15 PM

Page 4, Q12. For locating concentrations of elderly/senior communities in the region, which threshold should be used?

1	Keep consistent methodology (regional average) as above.	Feb 7, 2014 11:04 AM
2	Explain what a standard deviation is and how its use is important.	Feb 4, 2014 1:54 PM
3	Includes more communities.	Feb 4, 2014 10:07 AM
4	This is a grey area in term of "minority" populations -- but this population has a higher set of transportation service needs than many other populations	Jan 29, 2014 2:41 PM
5	The more inclusive option seems prudent to "play it safe" when it comes to identifying populations and preventing discrimination.	Jan 29, 2014 11:53 AM
6	Understand the areas, numbers, and concentrations of elderly aids the design and delivery of required services.	Jan 29, 2014 10:16 AM
7	Any amount above the means seems to be too sensitive.	Jan 28, 2014 2:35 PM
8	No systematic undercounting of seniors, so this seems appropriate.	Jan 28, 2014 10:36 AM
9	Its better.	Jan 28, 2014 10:34 AM
10	Just becuae its more than the average doesn't seem like its a concentration of people.	Jan 28, 2014 9:16 AM
11	how about equal to or below by an SD or 2 pecent.	Jan 27, 2014 5:27 PM

Page 4, Q13. For locating concentrations of youth communities in the region, which threshold should be used?

1	Keep consistent methodology (regional average) as above.	Feb 7, 2014 11:04 AM
2	Same as above	Feb 5, 2014 2:14 PM
3	Consistency.	Feb 4, 2014 1:54 PM
4	This is a grey area in term of "minority" populations -- but this population has a higher set of transportation service needs than many other populations	Jan 29, 2014 2:41 PM
5	The more inclusive option seems prudent to "play it safe" when it comes to identifying populations and preventing discrimination.	Jan 29, 2014 11:53 AM
6	Same of above.	Jan 29, 2014 10:16 AM
7	As above.	Jan 28, 2014 2:35 PM
8	Census has historically undercounted youth under 10. (However, if the last 5-10 years of Census data have demonstrably corrected this distortion, then use greater than 1 std deviation.)	Jan 28, 2014 10:36 AM
9	Its better.	Jan 28, 2014 10:34 AM
10	Again, it doesn't seem like just because there is more than "average" number of youth, it should be considered a concentration.	Jan 28, 2014 9:16 AM
11	how about equal to or below by an SD or 2 percent.	Jan 27, 2014 5:27 PM

Page 4, Q14. For locating concentrations of low-income communities in the region, which threshold should be used? The definition for identifying a person or household as low-income would come from responses to question 9 of this survey.

1	Keep consistent methodology (regional average) as above.	Feb 7, 2014 11:04 AM
2	Unsure	Feb 5, 2014 2:14 PM
3	Consistency. Also, using a standard deviation allows Metro to take into consideration normal variations and to determine that, at a certain threshold, the concentration is too much.	Feb 4, 2014 1:54 PM
4	It's a US standard.	Feb 4, 2014 10:07 AM
5	This is hard to measure	Jan 29, 2014 2:41 PM
6	I'm not sure where 20% came from (is there a basis for it?), and I prefer the most inclusive option.	Jan 29, 2014 11:53 AM
7	Paired with my choice of poverty being 150% of the poverty level, I think any communities above the average should qualify.	Jan 28, 2014 2:35 PM
8	Census has historically undercounted low income populations. (However, if the last 5-10 years of Census data have demonstrably corrected this distortion, then use greater than 1 std deviation.)	Jan 28, 2014 10:36 AM
9	Its the best of the selections.	Jan 28, 2014 10:34 AM
10	how about equal to or below by an SD or 2 percent.	Jan 27, 2014 5:27 PM

Page 5, Q15. Three categories are being proposed to classify investments:

- Roads and bridges
- Transit
- Bicycle and pedestrian

Do you support this framework for a programmatic analysis?"

1	No all areas within the region have been developed so as to be "retrofitted" for bikes/peds. Your categories would reflect a disinvestment in this category when, in reality, past planning efforts failed to provide for these transportation modes and accommodating them now will be hugely expensive.	Feb 4, 2014 2:02 PM
2	It works OK -- however on a pragmatic basis Transit and Bike/ PED are strongly related to the condition of the vehicle system facilities and often benefit from many -- but not all -- improvements to the vehicle system	Jan 29, 2014 2:49 PM
3	I'd advocate for separating out bicycle and pedestrian investments into two categories. Although they are both related, they are worth looking at independently since pedestrian infrastructure is something everybody relies on and uses, whereas bicycle infrastructure is not. Bicycle investments are still important, but in many ways support different policy goals than pedestrian investments. Also, do TDM programs fit within this framework? I couldn't decide whether they did or not since they often span all categories, but also may include components that don't necessarily fit.	Jan 29, 2014 12:29 PM
4	Consider broader definition of "roads" and "transit" to include commercial corridors which may present interesting options for supplemental investment.	Jan 29, 2014 10:32 AM
5	Need to address among priorities of the people living in poverty.	Jan 28, 2014 2:58 PM
6	Most road and bridge projects in the Metro area include some improvements for bicycle, pedestrian, or transit travelers. It doesn't make sense to treat them as though they're auto-only, when that's rarely the case.	Jan 28, 2014 10:48 AM
7	Its unsophisticated and doesn't mirror the current thinking of integrated HEAL design principles.	Jan 28, 2014 10:37 AM
8	Seems like there could be a framework that does not compare modes (e.g. geography; intent of project; etc). This is perpetuating the mode vs. mode mindframe.	Jan 28, 2014 9:47 AM
9	Sometimes a "road" investment is also a bicycle and pedestrian investment. Maybe its "capacity" or automobile. Also, how are Safety or ITS/TDM investments categorized?	Jan 28, 2014 9:22 AM
10	Programmatic analysis at METRO could be much broader. What about access to transit as a category?	Jan 27, 2014 5:30 PM
11	All of them need to be independent categories. For example, bicycle should be separated from pedestrian and pedestrian and transit should be given more investments for EJ communities. Pedestrian and transit should be prioritized over bridges and bicycle investments.	Jan 27, 2014 5:23 PM

Page 5, Q16. Based on the proposed investment categories, what are three benefits and burdens environmental justice communities experience with these programmatic investments (e.g. roadway, transit, bicycle/pedestrian) that should be considered more closely?

1	Burdens: 1) Community desire: Does the investment align with community wants and needs? 2) Equity (historically underserved communities): Do investments take into account equity? 3) Gentrification: Do investments take into account the impact that the investment will have on gentrification? Benefits: 1) Increase in active transit investment: Communities of Color and low-income communities are more transit dependent and have disproportionately higher incidence rate of pedestrian fatalities and accidents. 2) Increase in positive health outcomes: EJ communities will see an increase in positive health outcomes with increased investment in active transit 3) Increased access to goods, services, and jobs	Feb 7, 2014 11:13 AM
2	What services/amenities are bicycle/pedestrian/transit projects connecting EJ communities TO? Inequitable access to contracts/jobs that build new transportation infrastructure Disproportionate exposure to poor air quality from vehicular traffic	Feb 5, 2014 2:18 PM
3	1, Overall cost of housing includes the ease of access (benefit) or lack of adequate access (burden) of transportation investment. Most environmental justice communities experience a lack of investment in transportation systems overall that are effective and efficient. 2. Use of programmatic investments leads to gentrification and loss of housing within a neighborhood, and thus, a lack of the ability to experience the social benefits of location that public investment brings. 3. A safe, efficient, effective transportation system can improve access to jobs, schools and social benefits of place.	Feb 4, 2014 2:02 PM
4	Transit and bicycle/pedestrian programs as those are more attainable modes of transportation for EJ groups.	Feb 4, 2014 10:08 AM
5	Health related issues (including disability) and income issues affect the ability of many portions of the minority populations to access transportation services. It is all too common for planners to assume that low income populations and minority populations can easily switch from vehicle transportation to transit or active transportation -- this is not necessarily so.	Jan 29, 2014 2:49 PM
6	Benefits: 1. Increased accessibility to jobs and services, particularly for transit dependent households 2. Safety improvements 3. Neighborhood investment (including effects on improving personal safety) Burdens: 1. Potential displacement from being priced out of neighborhoods due to increased land values/rents 2. Physical barriers that separate neighborhoods/communities 3. Obvious ones like construction impacts, air quality, noise	Jan 29, 2014 12:29 PM
7	Burdens: 1. Poor planning related to acquisition and relocation of properties needed to create easements and new right of way for infrastructure investment. 2. Lack of public involvement related to public investment within neighborhoods which lead to misunderstandings and protest. 3. Fear of change created by public investment and how neighborhoods will be impacted. Benefits: 1. Safer infrastructure, greater economic returns, stabilization of weaker markets, enrichment of cultural and social environments. 2. Opportunity for detailed community planning and optimization of public and private investment potential. 3. Programmatic investments offers an opportunity for physical, social, and economic improvements that extend far beyond the physical infrastructure	Jan 29, 2014 10:32 AM

Page 5, Q16. Based on the proposed investment categories, what are three benefits and burdens environmental justice communities experience with these programmatic investments (e.g. roadway, transit, bicycle/pedestrian) that should be considered more closely?

8	Access/availability Money/cost Meeting community needs	Jan 28, 2014 5:27 PM
9	TRANSIT	Jan 28, 2014 2:58 PM
10	Roads enable transportation for those with vehicles but cause increased air pollution. Transit provides mobility but diesel buses produce toxic exhaust. Bike and ped transportation modes are a benefit in a nice environment but are poor transportation modes where bike ped infrastructure is poor.	Jan 28, 2014 2:44 PM
11	1. Does project improve access to residential areas with concentrations of EJ communities or destinations that serve EJ communities (i.e. schools, hospitals, libraries, etc.)? This should be measured via which populations/destinations fall within a reasonable (for the modes affected) network travelshed around the project. 2. Does the project have property impacts to residential areas with concentrations of EJ communities or destinations that serve EJ communities (i.e. schools, hospitals, libraries, etc.)? This should be measured via which populations/destinations are directly within/about the project area. 3. Does the project have environmental impacts/benefits to residential areas with concentrations of EJ communities or destinations that serve EJ communities (i.e. schools, hospitals, libraries, etc.)? This should be measured via which populations/destinations are geographically proximate (1/2 mi or less?) to the project area.	Jan 28, 2014 10:48 AM
12	Too broad of a question. Just look at the CLF equity atlas. Access, safety, health.	Jan 28, 2014 10:37 AM
13	-Access to jobs -Access to schools, other services -Access to transit -Frequency of transit -Transit coverage -Presence of sidewalks -Air quality -Noise	Jan 28, 2014 9:47 AM
14	Health Access Investment amount	Jan 28, 2014 9:22 AM
15	Disapacement Gentrification Emissions	Jan 27, 2014 5:30 PM
16	Before investments occur for major transportation projects, there needs to be an EJ analysis done to find out the negative impacts an investment might have on an EJ community (for instance, a new bridge development might increase pollution and asthma rates). Bicycle investments rarely benefit EJ communities.	

**Appendix D: Public Comment Summary and Comment Log for the
2014 Regional Transportation Plan and 2015-2018 Metropolitan
Transportation Improvement Program Environmental Justice and
Title VI Assessment**

**2014 Regional Transportation Plan and 2015-2018 Metropolitan Transportation
Improvement Program Environmental Justice and Title VI Assessment
Public Comment Summary and Responses**

1. Metro should streamline the methodologies for disparate impact and disproportionate burden as there is not practical distinction between them

Staff Response: Metro staff recognizes the complex nature of the current methodology for the Environmental Justice and Title VI Assessment for the 2014 RTP and 2015-2018 MTIP. As a result, Metro staff has made several recommendations to look at reshaping the methodology for the 2018 RTP and the 2018-2021 MTIP Environmental Justice and Title VI Assessment, including looking at streamlining the methodology for disparate impact and disproportionate burden, if reasonable. Please see Chapter 5 of the adoption draft of the Environmental Justice and Title VI Assessment for more detail.

2. Metro should withdraw use of the four-fifths rule and develop a statistical significance test for determining disparate impacts.

Staff Response: Metro recognizes the debate about the use of the four-fifths rule to determine disparate impacts of public transportation funds as well as the general concerns voiced by stakeholders regarding the methodology for conducting the Environmental Justice and Title VI Assessment for the 2014 RTP and the 2015-2018 MTIP. As a result Metro staff is making procedural recommendations to look at different methods to determining disparate impact. Metro is open to re-evaluating and employing a different methodology for the next RTP and MTIP cycle. At this time the four-fifths rule is not being codified as the sole method for determining disparate impact for all future analyses. The four-fifths rule was tested for the Environmental Justice and Title VI Assessment for the 2014 RTP and 2015-2018 MTIP based on staff's research of how peer agencies are conducting Title VI assessments. Other MPOs have used the four-fifths rule. Additionally, FTA's circular 4702.1B did not provide MPOs guidance in assessing disparate impact, leaving the analysis to agency discretion. Metro's effort in using the four-fifths rule was in good faith, and has come to learn some of its disadvantages. Please see Chapter 5 of the adoption draft of the Environmental Justice and Title VI Assessment for more detail.

3. Ensure communities of concern are only those communities that have concentrations of residents in excess of demographic thresholds. Also ensure the comparative analysis is appropriately measuring the community of concern population against the non-community of concern population.

Staff Response: When Metro staff looked at just assessing the geographies in the region where individual communities of concern exceed the demographic thresholds, staff noticed the analysis would end up excluding a large number of the individual community of concern which resides in the region, but is not residing in an area where the population exceeds the demographic threshold. As a result, the Environmental Justice and Title VI Assessment for the 2014 RTP and the 2015-2018 MTIP looked to evaluate disproportionate benefits and burdens as well as disparate impact for the region's entire population of communities of concern as well as those geographies where the

communities of concern population exceeds certain thresholds. The methodology for the 2014 RTP and 2015-2018 MTIP Environmental Justice and Title VI assessment evaluates transportation investment levels for each of the five identified communities of concern and does not attempt to aggregate and assess multiple demographic factors.

Lastly, Metro recognizes stakeholder concerns with the methodology for conducting the assessment, including the nature of how levels of investments comparisons were made between communities of concern relative to the total population. These comments and factors are all being taken into consideration and review. Metro staff has made several recommendations to look at re-evaluating the methodology for the 2018 RTP and the 2018-2021 MTIP Environmental Justice and Title VI Assessment, including looking at streamlining the methodology for disproportionate burden and disparate impact. Please see Chapter 5 of the adoption draft of the Environmental Justice and Title VI Assessment for more detail.

4. Metro must assess disparate impacts public transit capital and operations, as well as investments funded from local sources in addition to the state and federal sources.

Staff Response: The funding investments included in the RTP planning and MTIP programming are capital investments. The circular published by FTA requires metropolitan planning organizations look at state and federal public transit funds in aggregate. Therefore, this assessment only considers capital project investments from state and federal funds. TriMet and SMART also have extensive guidance requirements from FTA on assessing civil rights impacts of operation investments and proposed changes to service. Transit operating revenue tends to come from local sources.

While federal guidelines require metropolitan planning organizations look at public transportation from state and federal sources in aggregate, Metro staff also recognizes investments from local sources can provide a more comprehensive picture of the affects transportation investments have on communities of concern. As a result, Metro has made recommendations to explore in the methodology for the 2018 RTP and the 2018-2021 MTIP Environmental Justice and Title VI Assessment which includes local sources of funding. Please see Chapter 5 of the adoption draft of the Environmental Justice and Title VI Assessment for more detail.

5. Metro should apply the disparate impact analysis to all transportation investments (including road and active transportation investments) rather than singling out the public transportation investments.

Staff Response: The disparate impact evaluation is in response to FTA Circular 4702.1B which states a disparate impact analysis is to be undertaken with federal and state public transportation funds in aggregate. Because the 2014 RTP and 2015-2018 MTIP Environmental Justice and Title VI assessment is the first time Metro conducted a disparate impact analysis, the emphasis was placed on testing a methodology on the required element. Metro staff will consider evaluating all investments for disparate impacts for future environmental justice and Title VI assessments if time and budget allow. However, at this time, greater emphasis is being placed on refining the methodology for conducting the disparate impact analysis for the public transit portion.

6. The approach of the assessment at the program level will not provide adequate or useful information about the negative impacts of individual projects on communities of color and low-income communities. The disproportionate benefits and burden and disparate impact analysis should be conducted for each project included in the RTP and the MTIP.

Staff Response: As the metropolitan planning organization, Metro's obligations under the Executive Order 12898 on Environmental Justice and Title VI of the Civil Rights Act of 1964 are to evaluate the policies, plans, and programs in aggregate for disproportionate burdens and disparate impacts across the entire region because the plans, policies, and programs have an implication across all residents in the region. Local project sponsors are also obligated under the Executive Order and Title VI to conduct analyses during planning and project development to ensure the individual projects are not causing disproportionate burden or disparate impact.

7. The public comment process does not comply with the FTA's Title VI requirements. Metro must commit to a more effective public engagement process for future review.

Staff Response: Appropriate guidance on this issue is stated in FTA C 4702.1B, III-8, which states, in part:

Recipients have wide latitude to determine how, when, and how often specific public participation activities should take place, and which specific measures are most appropriate. Recipients should make these determinations based on a demographic analysis of the population(s) affected, the type of plan, program, and/or service under consideration, and the resources available.

Within that latitude, however:

Grant recipients are required to comply with the public participation requirements of 49 U.S.C. Sections 5307(b) (requires programs of projects to be developed with public participation) and 5307(c)(1)(I) (requires a locally developed process to consider public comment before raising a fare or carrying out a major reduction in transportation service). FTA/FHWA (Federal Highway Administration) joint planning regulations (23 CFR part 450) require States and MPOs engaged in planning activities to seek out and consider the needs and input of the general public, including interested parties and those traditionally underserved by existing transportation systems, such as minority and LEP persons, who may face challenges accessing employment and other services, as States and MPOs develop and conduct their public involvement activities.

In developing the public involvement plan for the 2014 Regional Transportation Plan and 2015-18 Metropolitan Transportation Improvement Program, Metro designed a process to receive comments through:

- an online tool and questionnaire created as a more accessible portal for the general public to let their desires be heard by focusing questions on the challenges faced by and desires of participants rather than trying to explain the RTP and MTIP as overall plans or programs
- more detailed and specific questionnaires focused on the RTP and MTIP specifically
- email
- letter
- phone call and message

- three planning forums (open houses with discussion components) at transit-accessible locations.
- a public hearing
- other conversations.

The 45-day comment period was promoted through newspaper ads, postings on the Metro newsfeed, notification to the OptIn panel, and an update to Metro's planning enews list. Notices were also disseminated through Metro's Public Engagement Network and neighborhood association contacts.

Ads were placed in the Beaverton Valley Times, Gresham Outlook, Portland Observer, Asian Reporter and El Hispanic News. The notice in El Hispanic News was presented in both English and Spanish; other ads had translated text stating the purpose of the notice and providing contact information for more information.

Metro prepared the general focus-questionnaire in Spanish ahead of the comment period and was prepared to translate that questionnaire into other languages on request. Metro's language resource program was prepared to have live translation via a third-party telephonic translation service and prepared to provide translators at the planning forums and public hearing.

For this assessment, Metro took advantage of the required public comment period for the air quality conformity analysis to pursue qualitative data on the potential benefits and burdens of these programmatic investments. This was also an opportunity to comment on quantitative methodology and data demonstrating the RTP and MTIP as having a higher rate of investment in communities of concern when compared to the regional rate. An online questionnaire provided a summary of the quantitative methodology and results and asked participants for benefits and burdens that could be associated with transportation investments and ways that Metro might address burdens on these communities.

This 30-day comment period was promoted through newspaper ads, postings on the Metro newsfeed, an update to Metro's planning enews list, and invitations to comment emails to community based organizations and agencies that serve and support these communities of concern. Ads were placed advertised in the Beaverton Valley Times, Gresham Outlook, Portland Observer, Portland Skanner, Asian Reporter and El Hispanic News. The ads all had translated text stating the purpose of the notice and providing contact information for more information.

Metro recognizes the concerns voiced by stakeholders with this level of engagement and works to continue to improve its engagement of people of color and those with limited English proficiency as well as others who have been underrepresented in decision-making processes. It is important to note, especially in context of 49 U.S.C. Sections 5307(b) and CFR part 450, that the update of the RTP project list and the compilation of the MTIP are not entirely discrete entities, but rather part of connected opportunities (and responsibilities) to engage the public and, more specifically, underrepresented communities. The update of the RTP project list comes out of local processes to update city and county transportation system plans and county- and City of Portland-coordinated processes to prioritize projects to submit to Metro. The compilation of the MTIP brings together funding packages from ODOT, Metro, TriMet and SMART, with each process determining how best to seek out and consider the needs and input from affected communities. As projects move forward on the local level, there continues to be the opportunity and responsibility to engage and consider

the affect people of color and people with limited English proficiency as well as other underrepresented communities and the public as a whole.

The 2018 Regional Transportation Plan update is envisioned as an opportunity to reassess the wider policies of the RTP along with the project list update that was the focus of this update. In preparation for this broader update addressing wider questions of policy, Metro will continue to refine and develop the communications strategy for regional transportation planning and programming which communicates clearly, simply, and effectively with communities of concern and seek and use innovative opportunities to engage with these communities.

8. Metro must continue to develop its Title VI analysis and apply it uniformly to all major transportation spending decisions.

Staff Response: Please see response to public comment #1 and comment #5.

9. Greater levels of transportation investments should be made in communities of concern, particularly investments related to active transportation and transit.

Staff Response: Based on the 2014 RTP and 2015-2018 MTIP Environmental Justice and Title VI assessment, the region is investing in communities of concern at a level higher than the regional average in the short and long-term.

Supplemental Comment and Response for June 30, 2014 meeting with OPAL Director Jonathan Ostar

Metro staff met with OPAL director Jonathan Ostar on June 30, 2014 to better understand some of the issues raised in his comment letter. The meeting clarified his position and recommended responses on two specific issues:

- a. use of the 4/5ths method to analyze disparate impacts, and
- b. the comparison of investments in communities of concern relative to investments in the remaining regional community rather than in comparison to the regional average as a whole.

Mr. Ostar reiterated his request to remove reference to use of the 4/5ths method as a means of determining disparate impact. He stated that rather than a quantitative indicator of disparate impact, the use of 4/5ths analysis in other contexts as a method to determine an actionable finding of disparate impact.

Metro staff agreed to remove reference to the 4/5ths analysis method as a means of quantitatively indicating a disparate impact, other than noting it as a method that was considered for the quantitative analysis. Staff is comfortable removing this reference as there is no established or definitive method in quantitatively determining a disparate impact for transportation investments. Additionally, the assessment found that both the MTIP and the RTP were investing in communities of concern at a higher rate than in the region as a whole, and as the staff response to previous comments on this issue was to recognize the dissatisfaction with use of this tool and to recommend investigating new methods to quantitatively analyze disparate impacts in future analysis.

Mr. Ostar also clarified that the analysis of investment levels in areas of concentrated communities of concern should be compared to the level of investment in the remaining areas of the region. He said this type of comparison is most consistent with the intent of the Title VI language.

Metro staff was able to utilize the data from the existing assessment and provide an additional comparison of the level of investment utilizing the method advocated by Mr. Ostar. The results of this assessment are provided in the table below.

Utilizing this methodology, the data indicates that for both the 2014 Regional Transportation Plan and for the 2015-18 Metropolitan Transportation Improvement Program, a higher level of investment is being made in concentrated communities of concern than in the remainder of region. The one exception is the rate of investment by the 2014 RTP in concentrated communities of young persons relative to the rest of the region.

Young persons are a group with unique transportation needs that can be underserved in the transportation planning and programming process and were therefore included in the assessment. However, they are not specified as a class that requires assessment or is protected under Title VI.

The assessment indicates that the region is investing in concentrated areas of young persons in the immediate future through committed funding in the 2015-18 MTIP at a higher rate than the remainder of the region. Because the long-range RTP will be updated again prior to the end of these immediate investments programmed in the 2015-18 MTIP, actions to address this lower rate of investment can be addressed through proactive consideration and early assessment of investment levels in the 2018 RTP update. This consideration and assessment would complement efforts to meet current recommendations to update the methods of conducting the civil rights related assessment of transportation investment in the next MTIP and RTP updates and is therefore the recommended course of action.

Communities of Concern in Concentration Comparisons										
	Regional Total Investment	Regionwide Total Population	Regionwide Area	Regional Total Investment Per Person Per Area						
RTP	\$14,204,130,285	1,544,515	714,385	0.01287						
MTIP	\$585,831,499	1,544,515	714,385	0.00053						
	Total investment in areas with concentrated People of Color	Total population in areas with concentrated People of Color (includes POC and Non-POC)	Total area with concentrated People of Color (Acres)	Investment per person/per acre in areas with concentrated POC	Total investment in areas without concentrated People of Color	Total population in areas without concentrated People of Color (includes POC and Non-POC)	Total area without concentrated People of Color (Acres)	Investment per person/per acre in areas without concentrated POC	Investment per person/per acre in areas with concentrated POC relative to areas without concentrated POC	Notes
RTP	\$7,043,369,183	636,948	99,099	0.11159	\$14,092,370,527	907,567	615,286	0.02524	442%	The regional average of people of color in areas of concentrated POC is 45% compared to 14% in areas without a concentration of POC.
MTIP	\$538,430,658	636,948	99,099	0.00853	\$580,439,539	907,567	615,286	0.00104	821%	
	Total investment in areas of concentrated Limited English Proficiency Persons	Total population in areas with concentrated LEP persons (includes LEP and Non-LEP)	Total area with concentrated LEP persons (Acres)	Investment per person/per acre in areas with concentrated LEP persons	Total investment in areas without concentrated Limited English Proficiency persons	Total population in areas without concentrated LEP persons (includes LEP and Non-LEP)	Total area without concentrated LEP persons (Acres)	Investment per person/per acre in areas without concentrated LEP persons	Investment per person/per acre in areas with concentrated LEP persons relative to areas without concentrated LEP persons	Notes
RTP	\$9,076,301,804	605,161	112,704	0.13308	\$12,489,163,080	939,354	601,681	0.02210	602%	The regional average of LEP persons in areas of concentrated LEP persons is 14% compared to 4% in areas without a concentration of LEP persons.
MTIP	\$510,358,655	605,161	112,704	0.00748	\$545,606,226	939,354	601,681	0.00097	775%	
	Total investment in areas of concentrated persons with low income	Total population in areas with concentrated persons with low income (includes low income and non-low income)	Total area with concentrated persons with low income (Acres)	Investment per person/per acre in areas with concentrated persons with low income	Total investment in areas without concentrated persons with low income	Total population in areas without concentrated persons with low income (includes low income and non-low income)	Total area without concentrated persons with low income (Acres)	Investment per person/per acre in areas without concentrated persons with low income	Investment per person/per acre in areas with concentrated persons with low income relative to areas without concentrated persons with low income	Notes
RTP	\$10,619,627,423	699,059	115,160	0.13192	\$ 6,201,348,715	845,456	599,225	0.01224	1078%	The regional average of persons with low income in areas of concentrated low income is 41% compared to 17% in areas without a concentration of low income.
MTIP	\$517,752,815	699,059	115,160	0.00643	\$ 140,387,344	845,456	599,225	0.00028	2321%	
	Total investment in areas of concentrated Young persons	Total population in areas with concentrated Young persons (includes Young and Non-Young)	Total area with concentrated Young persons (Acres)	Investment per person/per acre in areas with concentrated Young persons	Total investment in areas without concentrated Young persons	Total population in areas without concentrated Young persons (includes Young and Non-Young)	Total area without concentrated Young persons (Acres)	Investment per person/per acre in areas without concentrated Young persons	Investment per person/per acre in areas with concentrated Young persons relative to areas without concentrated Young persons	Notes
RTP	\$7,151,269,906	813,310	298,736	0.02943	\$13,941,390,680	731,205	415,649	0.04587	64%	The regional average of Young persons in areas of concentrated young persons is 23% compared to 9% in areas without a concentration of young persons.
MTIP	\$526,600,532	813,310	298,736	0.00217	\$577,158,210	731,205	415,649	0.00190	114%	
	Total investment in areas of concentrated Older persons	Total population in areas with concentrated Older persons (includes Older and Non-Older)	Total area with concentrated Older persons (Acres)	Investment per person/per acre in areas with concentrated Older persons	Total investment in areas without concentrated Older persons	Total population in areas without concentrated Older persons (includes Older and Non-Older)	Total area without concentrated Older persons (Acres)	Investment per person/per acre in areas without concentrated Older persons	Investment per person/per acre in areas with concentrated Older persons relative to areas without concentrated Older persons	Notes
RTP	\$10,701,974,854	553,850	346,769	0.05572	\$13,915,791,562	990,665	367,615	0.03821	146%	The regional average of Older persons in areas of concentrated older persons is 21% compared to 5% in areas without a concentration of older persons.
MTIP	\$529,031,830	553,850	346,769	0.00275	\$582,601,112	990,665	367,615	0.00160	172%	

Appendix D to Resolution No. 14-4533

2014 Regional Transportation Plan and 2015-2018 Metropolitan Transportation Improvement Program (MTIP) Environmental Justice and Title VI Assessment Web Questionnaire Comments

#	What are the potential benefits and burdens on communities of concern from investments in roads, transit, and active transportation?	Are there things we can do at a regional level (through policies or programs) to address, mitigate, and/or prevent the potential burdens from road, transit, and active transportation investments on communities of concern?	Source(s)	Date
1	I support the efforts to increase investments in communities of concern in order to improve safety and access to transit and active transportation.	Educating drivers so that those using transit and active transportation are not marginalized or unsafe. Work to halt the them-vs-us dichotomy that exists between motor vehicle operators and transit/active transport users. We are all road users and no one group should be, or act superior, or put the other users at risk.	Barb Grover	5/24/2014
2		Please see appended letter from Dante James, Director of City of Portland Office of Equity and Human Rights	Dante James	6/12/2014
3	The benefits are better and more efficient transit in these areas. The burden and problem would be acquiring right-of-way and space from these communities that are already established and built out.	Plan the best that we can, and involve any affected areas early in the planning process.	Liles Garcia	6/13/2014
4		Please see appended letter from Jennfer Bragar, Housing Land Advocates Board President	Jennifer Bragar	6/19/2014
5		Please see appended letter from Jonathan Oster, Executive Director of OPAL	Jonathan Oster	6/20/2014

Appendix D to Resolution No. 14-4533

**2014 Regional Transportation Plan and 2015-2018 Metropolitan Transportation Improvement Program
(MTIP) Environmental Justice and Title VI Assessment
Web Questionnaire Comments**

#	What are the potential benefits and burdens on communities of concern from investments in roads, transit, and active transportation?	Are there things we can do at a regional level (through policies or programs) to address, mitigate, and/or prevent the potential burdens from road, transit, and active transportation investments on communities of concern?	Source(s)	Date
6		Please see appended letter from Heidi Guenin, Policy Manager for Land Use and Transportation at Upstream Health	Heidi Guenin	6/20/2014
7		Please see appended letter from Mary Kyle McCurdy, Policy Director and Staff Attorney for 1000 Friends of Oregon and Mara Gross, Executive Director of Coalition for a Livable Future	Mary Kyle McCurdy Mara Gross	6/20/2014
8		Please see appended letter from Mychal Tetteh, Chief Executive Officer of Community Cycling Center	Mychal Tetteh	6/20/2014



**OFFICE of EQUITY
and HUMAN RIGHTS**
CITY OF PORTLAND

Realizing Equity. Enhancing the City of Portland.

Commissioner in Charge:
Charlie Hales, Mayor

Bureau Director:
Dante J. James, Esq.

June 12, 2014

Tom Hughes
Metro President
600 NE Grand
Portland, Oregon 97232

Shirley Craddick
Metro Councilor

Carlotta Collette
Metro Councilor

Craig Dirksen
Metro Councilor

Sam Chase
Metro Councilor

Bob Stacey
Metro Councilor

Dear Metro Council:

The City of Portland, through the Office of Equity and Human Rights' Title VI Program, submits this letter to raise its concerns about the methodology used in the Metro RTP and MTIP Environmental Justice and Title VI Assessment. The approach of assessment only at the program level will not provide adequate or useful information about the negative impacts of *individual projects* on communities of color and low income communities. We urge the Metro Council to direct Metro staff to apply the methodology to the assessment of individual projects.

Environmental Justice regulations and Civil Rights requirements were put in place to protect communities of color and low income communities. While the methodology may meet the letter of the law, it does not allow for impact or equity analysis on these communities. Without this next step, the methodology provides little help to consider the benefits or burdens of the projects within the RTP program on the protected communities.

The region has been a leader in transportation and planning for growth. Much of the forward thinking work of Metro and other regional agencies was not to "the letter of the law" and pushed the boundaries of policy, design, and practices, setting new definitions of innovation. To lead on this issue now, the region must again push the boundaries, and in a similar vein of "moving beyond the letter of the law" we must consider the potential for displacement and gentrification,



the impact on transportation and housing affordability, and changes in commute and travel time at the project level.

Additionally, the methodology used should clearly state what to do if a burden on a protected community is found. For example the methodology could include “if a potential negative impact is identified, Metro first looks for less-burdensome alternatives; if no such alternative exists, Metro then seeks to mitigate the impacts through engagement with agencies representing the project area and with a well-researched review of progressive models and current best-practices.”

The current approach ignores the region’s focus on equity and its recognition that it must take specific steps to undo years of institutional racism that destroyed our communities of color and continues to negatively impact protected communities. The methodology does not consider Multnomah County’s adoption of an Equity and Empowerment Lens, Portland’s adoption of an Equity Framework or the principles of adopting an equity approach to deliver our services with equitable outcomes. The methodology should clearly articulate how Metro’s equity analysis will be incorporated.

Compliance with the circular and federal law is the floor, but we as persons in positions of trust should do more than mere baseline compliance. Similar to the Environmental Protection Agency’s 2014 Environmental Justice open statement to “*focus and accelerate efforts to identify, assess, and address environmental justice concerns in program strategies, and enforcement and compliance activities,*” we too must openly state “beyond the letter” that we support the regional efforts to be more equitable in our work and the development of meaningful and impactful data that will support equitable outcomes.

RECOMMENDATIONS

1. Apply Environmental Justice methodology to the individual projects and the project area within the RTP and the MTIP as part of a standard process when designing or planning projects
2. Consider and identify the potential for displacement and gentrification specifically in the methodology.
3. Consider the impacts on transportation and housing affordability, not just the change in property values for property owners.
4. Consider the cumulative impacts of VMT and emissions in the methodology.

5. Clearly outline how projects will be prioritized for funding based on the above findings.

Our work should reduce disparities for communities of concern, rather than reduce our ability to evaluate the impacts of our projects. We are committed to working on solutions to deliver a methodology that Metro and the region can use to meet our compliance goals and that provides real data at the project level about the impacts of the transportation investments on persons of color and low income communities. We are a willing partner in the quest to apply and develop best practices on impact assessment and analysis.

Sincerely,



Dante J. James
Director

cc.

Clifford Higgins
Civil Rights Title VI Coordinator
Metro

Shoshanah Oppenheim
Civil Rights Title VI Program Manager
City of Portland



June 19, 2014

BY EMAIL AND MAIL

Joint Policy Advisory Committee on Transportation
600 NE Grand Ave.
Portland, OR 97232

RE: MTIP and RTP Civil Rights Assessment

Chair Dirksen,

Housing Land Advocates (HLA) is an advocacy organization dedicated to using land use planning and legal action to address affordable housing conditions in Oregon. We have reviewed the Draft Civil Rights Assessment, and we join the Comment submitted by the Transportation Justice Coalition and OPAL. We write separately to emphasize (1) the public comment process for the Assessment does not comply with Title VI, and (2) the methodology employed by the Assessment should better reflect the equity goals of Metro, rather than merely attempting to bring Metro into Title VI compliance.

I. Background

In December of 2012, HLA wrote to JPACT to express our concern that the development and disbursement of the "Regional Economic Opportunity Fund" did not comply with Metro's Title VI obligations. In June of last year, HLA, this time joined by the Fair Housing Council of Oregon, again wrote Metro and JPACT to express our concern that the allocation process for Regional Flexible Funds failed to comply with Title VI requirements.

Earlier this year, Metro conceded shortcomings in its Title VI analyses and announced a plan to revamp the methodology used to conduct the requisite equity analysis that must accompany all major transportation spending proposals. This new methodology was then applied to the proposed 2014 RTP and the proposed 2015-2018 MTIP.

II. The Public Comment Process Does Not Comply With the FTA's Title VI Requirements

The Federal Transportation Authority (FTA) has identified the public comment process as being key to effectively implementing Title VI of the Civil Rights Act. The process is intended to ensure that all citizens, and citizens of color and those with

limited English proficiency in particular, have an opportunity to express their views on the allocation of federal funds.

In order to ensure proper public engagement, the FTA requires MPOs to, among other things, submit a summary of efforts made to engage these particular communities as well as a summary of the racial breakdown of decision-making committees.

The racial breakdown of JPACT has not been tabulated. Nor does it appear that Metro has made any particularized effort to engage protected-class communities. This is not just a technical shortcoming on Metro's part, but, instead, reflects a continued pattern of failing to properly engage and educate the community when it comes to major spending decisions. Without this engagement as well as proper technical support, it is virtually impossible for the community to provide informed feedback.

While HLA applauds Metro's initial efforts to engage stakeholders for feedback on developing the Title VI methodology, Metro's engagement efforts have taken several steps backwards with the Assessment – emailing a link to the Assessment to stakeholders simply does not count as good-faith public engagement.

Further, given the technical nature of the Assessment, without proper support from Metro it is unrealistic to expect the stakeholders and community members who actually received the link or otherwise became aware of the Assessment to be able to digest, analyze and respond to it in a meaningful way. For example, while it may not be difficult to understand the Assessment's conclusion that “based on the 4/5 rule . . . the results of the analysis show there is not the presence of disparate impact in the 2014 RTP public transit investments,” it is virtually impossible to understand how Metro reached this conclusion – even those stakeholders or community members with adequate expertise to analyze the conclusion would likely find such analysis difficult or impossible given that the Assessment inexplicably does not contain the hard data that was used to reach this conclusion.

The Assessment reflects major oversights on Metro's public engagement obligations – oversights that must be rectified.

III. Metro Must Continue to Develop its Title VI Analysis and Apply it Uniformly to All Major Transportation Spending Decisions

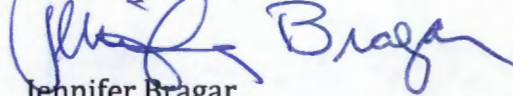
Again, HLA applauds Metro's initial efforts to revamp its Title VI analysis. We are encouraged by the hard work of Metro staff and Metro's commitment mapping, as well as its efforts to find and utilize meaningful definitions. We urge Metro to continue to refine the analysis and, most importantly, to uniformly apply the analysis to all major transportation spending.

While employing the analysis to the RTP and MTIP is a good first step, the reality is that the use of the analysis on such long-term plans with so many moving parts will

do little to achieve the truly equitable region that Metro has committed to building. At best, the analysis can identify potential red flags and allow Metro to react to them. While this is no doubt important, we expect Metro's aspirations to be much higher. We therefore urge Metro to apply the analysis uniformly, and to use its metrics to evaluate all projects submitted to Metro for transportation spending.

We continue to be committed to working with Metro staff to address these concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jennifer Bragar".

Jennifer Bragar
HLA Board President

cc:

Metro Council President Tom Hughes (by email)
Councilor Shirley Craddick, District 1 (by email)
Councilor Carlotta Collette, District 2 (by email)
Councilor Craig Dirksen, District 3 (by email)
Councilor Kathryn Harrington, District 4 (by email)
Councilor Sam Chase, District 5 (by email)
Councilor Bob Stacey, District 6 (by email)

PDX_DOCS:518979.2

June 20, 2014

Metro
600 NE Grand Ave
Portland, OR 97232

Dear Ted Leybold,

Thank you for the opportunity to comment on Metro's Environmental Justice and Title VI assessment in advance of updating the Regional Transportation Plan (RTP) and Metropolitan Transportation Improvement Program (MTIP). It is clear that Metro has advanced its work in terms of identifying thresholds to inclusively establish "communities of concern" to serve as a basis for robust disparate impact analysis.

Metro's efforts and intentions are laudable, yet the methodology proposed will actually frustrate our region's equity goals and the intent and purpose behind our Civil Rights and EJ laws and policies. OPAL urges Metro to scale back its approach based on the following recommendations, which will allow the agency to engage in a genuine process with regional equity stakeholders and experts to collaboratively hone the methodology to more precisely ensure full Civil Rights compliance and environmental justice objectives.

- (1) Withdraw consideration of the 80% Rule; it is a disfavored rule, is arbitrary and capricious, and compounds past inequities. All discrimination is unlawful.
- (2) Streamline and converge the methodologies for disparate impact and disproportionate burden, as there is no practical distinction between them.
- (3) Ensure that communities of concern are only those communities that have concentrations of residents in excess of demographic thresholds.
- (4) Ensure that communities of concern are measured against appropriate comparison population; i.e., communities of color v. white communities.
- (5) Assess disparate impacts for public transit operations as well as capital.
- (6) Assess disparate impacts for all transportation programs and investments receiving federal assistance, including roads/highways and active transportation.
- (7) Apply the methodology to each specific project included in RTP/MTIP.
- (8) Commit to more effective public engagement process to develop more equitable methodology for future reviews, and work with stakeholders to diversify JPACT.

These recommendations are the minimum steps Metro must take to ensure that this current proposal moves forward in a manner that will not perpetuate racial and socioeconomic disparities. The consequences of this methodology are significant, and Metro's process in engaging potentially impacted communities has been insufficient. Metro must show a real commitment to meeting not only the letter but also the spirit of Title VI and Environmental Justice policies and regulations, and work with local experts, interested stakeholders, and representatives of communities of concern to develop an approach that is fair, accessible and inclusive. Please see the attached memorandum for specific comments and support.

OPAL Environmental Justice Oregon and our partners look forward to collaborating with Metro in the near future to develop a methodology and guidance that will actually reinforce and meet our shared goals around regional livability and equity.

Sincerely,

Jonathan Ostar, Director
OPAL Environmental Justice Oregon

1. Metro should withdraw the proposed 80% (four-fifths) Rule for determining the statistical validity of disparate impact.

In attempting to develop a methodology to determine when a statistical differentiation rises to the level of an *adverse disparate impact*, Metro has drawn from Title VII employment discrimination practice and case law in applying the four-fifths (or 80%) rule. In doing so, Metro will institutionalize up to 20% discrimination, contrary to the spirit and intent of federal and state Civil Rights and environmental justice law and policy, and Metro's own regional equity priorities.

All discrimination is unlawful, however slight. Adoption of the four-fifths rule could have the effect of perpetuating historical discrimination, which is not subjected to prospective analysis under Title VI. Moreover, the 80% Rule is arbitrary and capricious and has fallen out of favor with the federal government.

The 80% Rule is grounded in California state employment fair practice policy, and was first codified in the 1978 Uniform Guidelines on Employee Selection Procedures, used by the EEOC and Departments of Labor and Justice in Title VII enforcement.¹ It has no basis in Title VI policy or law, and there is no support for applying it to Title VI. The 80% Rule has many shortcomings: it is insensitive to smaller sample sizes (likely within the Portland metro area, given fewer people of color); it is insensitive to the magnitude of a disparity between protected and non-protected classes (not all 20% discrimination is the same); and it is arbitrary, wholly lacking in any statistical basis (why not 75%, or 90%).

The EEOC itself recently issued a memorandum suggesting that the 80% Rule was no longer defensible,² and the Uniform Guidelines was more recently revised to state, "smaller differences in selection rate may nevertheless constitute adverse impact, where they are significant in both statistical and practical terms ..."³ Several federal courts have applied a practical significance test assess the "practicality" or "stability" of the results of a disparate impact analysis (requiring alteration of control populations).⁴ While no disparate impact is acceptable, should there be a need for a "margin" to account for de minimus disparate impacts, communities of concern must be fully informed and engaged in developing a practical significance test that will not arbitrarily lead to the perpetuation of discrimination across all investment types. This 80% Rule is unjust and violates the spirit of collaborative intent with which community partners seek from Metro.

¹ Biddle, Dan. *Adverse Impact And Test Validation: A Practitioner's Guide to Valid And Defensible Employment Testing*. Aldershot, Hants, England: Gower Technical Press. pp. 2–5.

² http://www.eeoc.gov/abouteeoc/meetings/5-16-07/testcase_ashe.html (recommending that an employer's hiring rate of a particular group should be compared with a randomized hiring rate, further indication that the 80% rule has no basis to be applied in a Title VI context).

³ "Adverse impact and the 'four-fifths rule,'" www.uniformguidelines.com

⁴ See, e.g., *Contreras v. City of Los Angeles*, 656 F.2d 1267 (9th Cir. 1981); *U.S. v. Virginia*, 569 F.2d 1300 (4th Cir. 1978); *Waisome v. Port Authority*, 948 F.2d 1370, 1376 (2d Cir. 1991).

2. Streamline and converge the methodologies for disparate impact and disproportionate burden, as there is no practical distinction between them.

Since the passage of the Civil Rights Act of 1964, through the inception of federal EJ policy, practitioners and regulators have used the terms *disparate* and *disproportionate* interchangeably. Indeed, the term *disproportionate* is often used in defining *disparate*, adding a connotation of unfairness. The terms *impact* and *burden*, with a negative connotation, are also used interchangeably, with the term *adverse effects* also used to describe the negative consequences of an action.

Disparate impact in a Civil Rights context dates to 1971, when the Supreme Court first held that facially neutral policies, such as an IQ test for employment, are unlawful where they disparately impact people of color and are not substantially related to employment.⁵ Agency regulations that have been promulgated pursuant to Title VI § 602 are known as *disparate impact regulations*, which prohibit prospective racial disproportionate effects.⁶ Executive Order 12898 requires agencies to make environmental justice part of their mission by identifying and addressing “*disproportionately* high and *adverse* human health or environmental *effects* of its programs, policies, and activities on minority populations and low-income populations.”⁷

In its most recent Title VI and EJ Circulars, FTA purportedly differentiates between *disparate impact* and *disproportionate burden* on the basis of one relating to Title VI and the other relating to environmental justice, respectively. According to FTA, a *disparate impact* refers only to effects on the basis of race, color or national origin, whereas a *disproportionate burden* refers only to effects on the basis of socioeconomic status. Yet both refer to policies or practices that “disproportionately affect” certain communities to be protected. In practical terms, it is a distinction without a difference.⁸

Only disparate impacts pursuant to Title VI are legally actionable, and even then, only through proof of discriminatory intent.⁹ A burden-shifting analysis would then apply to determine whether the policy or practice in question is substantially justified and whether less-discriminatory alternatives exist to achieve the objective.¹⁰ Complainants may seek redress for violations of agency Title VI regulations through administrative complaint process only. Disproportionate impacts on low-income *white* communities are not actionable in and of themselves, as the Executive Order created no new legal rights and socioeconomic status is not a federally protected class.¹¹ Upon finding a disproportionate burden, agencies are required evaluate alternatives and mitigate where practicable.¹²

⁵ *Griggs v. Duke Power Co.*, 401 U.S. 424 (1971) (striking down IQ tests as violating Title VII).

⁶ See, e.g., *Alexander v. Sandoval*, 532 U.S. 275 (2001).

⁷ EO 12898 (Feb. 11, 1994) (emphasis added).

⁸ FTA C 4702.1B, Chap. I-2.

⁹ *Sandoval*, *supra*.

¹⁰ *Darensburg v. MTC*, 41 ELR 20101 (9th Cir. 2011)

¹¹ EO 12898, Section 6-609.

¹² FTA C 4702.1B, Chap. I-2.

This is important because it shows the limitations of adhering to an overly narrow and literal reading of federal guidance, without understanding the practical consequences and implications for public engagement. Regardless of the terminology used, there is no practical difference between the way in which the *differential impacts* upon communities of concern are measured. The only difference is the potential for legal liability upon evidence of *differential impact*, depending on whether the disparities are racial or socioeconomic. Disproportionate burdens and disparate impacts are one and the same.

Here, Metro has confused the two by attempting an artificial distinction. Metro should develop one methodology, with common language, to quantify impacts, and a clear process for determining whether the policy or practice in question is legitimate, whether less discriminatory alternatives exist, or whether those impacts can be mitigated.

3. Ensure that communities of concern are only those communities that have concentrations of residents in excess of demographic thresholds.

Metro has created an artificial distinction between areas that meet a single demographic threshold triggering designation as a community of concern and areas that have a “concentration” of demographics triggering such designation.¹³ All that matters for Title VI is whether the unit of analysis (i.e. Census tract), meets the threshold for people of color and/or LEP population. If so, the unit is included in analysis as a “minority” unit. Metro must treat all units that meet at least one of the demographic indicator thresholds the same for Title VI purposes. Metro can, however, use data showing which units meet multiple demographic thresholds to inform its public engagement strategy, as those communities should be prioritized due to the likelihood of increased disparate impacts and the importance of ensuring their participation in decision-making processes.

Assessing which communities have multiple demographic concentrations meeting more than one indicator threshold is useful to better address multiple or cumulative burdens, but has no legal or practical relevance for Title VI compliance (and only adds confusion). The long-term EJ goal is to develop a cumulative impact framework to address multiple overlapping burdens, and Metro should take that effort out of this process and delegate it to the Equity Strategy Advisory Committee for further development.

4. Ensure that communities of concern are measured against appropriate comparison population; i.e., communities of color v. white communities.

Related to ensuring the correct units are included in the analysis, Metro must ensure that the correct comparison population is used. Title VI requires Metro to identify the communities with above-threshold concentrations of communities of color and LEP

¹³ Metro 2014 RTP and 2015-2018 MTIP Environmental Justice and Title VI Report (Report), p. 18. This language is confusing, and could be taken to mean that any Census tract with at least one individual person that meets the demographic indicator triggers inclusion of that unit in the disparate impact analysis.

populations and compare the investments in those communities with investments in “white” communities (i.e. all other units that do not have the sufficient concentration of people of color or LEP populations).¹⁴

Here, it appears Metro has identified communities of concern and incorrectly compared them to the entire regional population.¹⁵ This could be due to a defect in the way Metro identifies applicable units for inclusion. If any unit that has at least *one* individual that meets the demographic indicator is included, then the total regional population would be the comparison population on account of there being at least *one* white person in every Census tract. Of course, this is the opposite of what Title VI requires; the “minority” units must be compared to the “non-minority” units to determine whether there will be an equitable investment. Metro must revise its methodology and use the correct comparison population in order to ensure compliance.

5. Assess disparate impacts for public transit operations as well as capital.

6. Assess disparate impacts for all transportation programs and investments receiving federal assistance, including roads and active transportation.

The draft guidance incorrectly states that “all operating funds for transit service come from local sources,” thus excluding public transit operations from Title VI/EJ analysis.¹⁶ TriMet received \$15 million in federal operating grants in FY14 from Metro through the federal Regional Flexible Funds program.¹⁷ Therefore, *all* transit operations are subject to this analysis, given that TriMet receives *some* federal operating assistance.

Regardless, the federal capital grant funding TriMet receives triggers all of the agency’s “programs and activities” to Title VI analysis. It has been established that any and all programs or activities of an agency receiving *any* federal financial assistance must comply with Title VI and prevent discriminatory effects.¹⁸ Responding to conflicting judicial opinions, Congress, in the Civil Rights Restoration Act of 1987, “restore[d] the prior consistent and long-standing executive branch interpretation and broad, institution-wide application” of the program or activity language of Title VI and Title IX.¹⁹ The law now clearly prohibits racial discrimination in all the operations of a public or private entity if some part of that entity receives Federal financial assistance.²⁰

¹⁴ *Darensburg*, at 2566-67. (“The basis for a successful disparate impact claim involves a comparison between two groups — those affected and those unaffected by the facially neutral policy”).

¹⁵ See Report, p. 55-56.

¹⁶ See Report, p. 28.

¹⁷ TM FY14 Adopted Budget, p. Resources-2. See also, FTA C 4702.1B Chap. VI-2(a)(4).

¹⁸ *Bob Jones University v. Johnson*, 396 F.Supp. 597, 603 (D.S.C., 1974) (leg. history shows congressional intent for expansive reading of Title VI “programs and activities” clause).

¹⁹ Pub. L. No. 100-259, §2 (Mar. 22, 1988).

²⁰ 42 U.S.C. § 2000d-4a.

Moreover, Metro has limited its Title VI disparate impact analysis to public transit (capital) only, and not roads and active transportation, on account of FTA's more advanced guidance. Title VI applies to all recipients of federal funding, regardless of the authorizing agency rules.

7. Apply disparate impact methodology to each project included in RTP/MTIP.

Metro is proposing to apply the Title VI/EJ methodology to the entire transportation planning process, looking at all the regional investments cumulatively. Title VI requires Metro to identify the potential disparate impacts of each project that is part of its programs and activities receiving federal financial assistance.²¹ Here, Metro's regional level population statistics, especially for 25-year long-range planning, cannot explain with any precision the effect the RTP will have on communities of color or LEP populations, and can therefore not be used to support Title VI compliance.

8. Commit to more effective public engagement process for future review and work with stakeholders to diversify JPACT.

The new FTA Circular requires an MPO's Title VI program to include an outreach plan to engage communities of color and LEP populations, as well as a summary of outreach efforts made since the last program submission. This targeted public participation plan may be included in a broader effort to engage other traditionally underserved communities.²² In addition, MPOs "must provide a table depicting the racial breakdown of the membership of [decision-making] committees, and a description of efforts to encourage the participation of minorities on such committees or councils."²³

This information is important to understand the current dynamics of Metro's decision-making structure and the context within which to view Metro's outreach and engagement activities. Metro's outreach and engagement around this current draft proposal was inadequate, falling well short of the best practices of early, often and continuous engagement called for by environmental justice advocates. Complying with FTA requirements to disclose the racial demographics of decision-makers and the efforts, if any, to encourage greater racial representation on those committees is critical to advancing Civil Rights and environmental justice across the region.

²¹ *Darensburg*, at 2568-69, 2571 ("If the court had more precise data that would allow it to evaluate each project's impact on transit ridership, it could very well find that the proposed expansion plan actually favors minorities, or harms minorities to a greater extent than regional-level statistics may suggest").

²² FTA C 4702.1B, Chap. III-2

²³ *Id.*, at Chap. III-3.



June 20, 2014

Metro Council
600 NE Grand Avenue
Portland, OR 97232

Re: Metro's Regional Transportation Plan: Title VI and Environmental Justice Compliance

Dear Metro Council President Hughes and Council Members:

Upstream Public Health has been engaged with Metro's land use and transportation planning efforts as an important strategy for reducing health disparities in our region. Transportation and land use planning can result in better health outcomes for community members - through more options for affordable and accessible housing and transit, improved active transportation options, improved access to jobs and education, reductions in air pollution, and safer roads and trails, just to name a few. Unfortunately, transportation and land use planning can also result in poorer health outcomes, and historically, these negative impacts have fallen disproportionately on people of color. These impacts can be seen in the displacement of historically black communities for the construction of roads and rail or in the higher asthma rates suffered by people who live near busy roads - disproportionately people of color and people experiencing low incomes.

Most recently, Upstream's efforts with Metro have focused on the Powell/Division High Capacity Transit Planning project and on the Climate Smart Communities project, both of which have implications for public health for some of our region's most vulnerable residents. Upstream is excited to see Metro's efforts to better understand the impacts of Metro's work on vulnerable communities, but we share the concerns raised by our partners at OPAL Environmental Justice Oregon, 1000 Friends of Oregon, Coalition for a Livable Future, and Housing Land Advocates.

Upstream is particularly concerned with Metro's consideration of the 80% rule. Our region is

already characterized by deep health disparities, created in part by a history of disinvestment from and displacement of communities of color. For example, low birth weight and infant mortality, two health outcomes associated with traffic-related air pollution, disproportionately affect people of color.¹

	Low Birth weights % less than 5.5lbs	Teen birthrate % of 15-17 giving birth per 1000 teens	Infant mortality deaths per 1000 live births	Death from diabetes deaths per 100,000
White	5.9%	11.7	4.9	29.5
People of Color	8.1%	34.2	7.3	40.8
African American	11.4%	31.5	8.6	70.8
Asian	6.9%	13.3	6.0	21.1
Native American	8.4%	20.6	9.8	36.5
Hispanic	5.6%	71.5	4.9	34.7

Source: Multnomah County Health Disparities Project, 2008.⁸⁶

These disparities cannot be eliminated by land use and transportation policy alone, but if Metro chooses to enshrine disparities through the adoption of the 80% rule, we can never hope to have equitable health outcomes or achieve Metro's vision for equity in our region. Withdrawing the 80% rule is just the first step in revising Metro's Title VI methodology to meet the spirit and letter of the laws and regulations designed to protect communities of concern. Upstream supports the other recommendations made by our partners and detailed so carefully in testimony by OPAL Environmental Justice Oregon.

Thank you for consideration.

Sincerely,



Heidi Guenin

Policy Manager, Transportation & Land Use

¹ Curry-Stevens, A., Cross-Hemmer, A., & Coalition of Communities of Color (2010). Communities of Color in Multnomah County: An Unsettling Profile. Portland, OR: Portland State University.



Coalition for a Livable Future

107 SE Washington St., Suite 239
Portland, OR 97214

June 20, 2014

Metro Council
600 NE Grand Avenue
Portland, OR 97232

Re: Metro's Regional Transportation Plan: Title VI and Environmental Justice Compliance

Dear Metro Council President Hughes and Council Members:

1000 Friends of Oregon and the Coalition for a Livable Future have been engaged with Metro's 2014 update of its Regional Transportation Plan (RTP), in particular with the Active Transportation Plan (ATP) element, and with the RTP's integration into Metro's Climate Smart Communities. In this, 1000 Friends and the Coalition for a Livable Future have worked closely with many organizations concerned with provision of active and healthy transportation options, transportation equity, and greenhouse gas reduction.

Therefore, we are concerned by the issues raised in testimony submitted today by OPAL Environmental Justice Oregon, regarding whether the RTP update substance and process conform to requirements and guidelines of Title VI of the Civil Rights Act of 1971, Executive Order 12898 regarding environmental justice, and Metro's own six desired outcomes. Compliance with both the spirit and the law of these translates directly to the ability of Metro, and the region's communities, to achieve our greenhouse gas reduction target from the transportation sector.

Metro has been doing excellent work in developing Climate Smart Communities scenarios that will achieve the region's target GHG reduction. However, all the scenarios depend on a robust transit system – with more frequent service on existing bus lines and more bus lines than currently exist. The scenarios also depend on the region's residents having the option to walk and bicycle for many more of the 40% of our daily trips that are less than 3 miles.

Providing these options and having people actually *use* them requires making transportation investments in the right places and in the right modes of travel, including in both transit capital and operations. People of lower incomes and the approximately ¼ of our neighbors that cannot drive because of age or physical impediments use transit at a much higher percentage than other populations.

Metro has made great strides in identifying these and other "communities of concern" - those areas with significant concentrations of people of color, people with low-incomes, limited

English proficiency (LEP) populations, and both young and older residents. And Metro has taken some steps to engage communities of concern in the RTP and MTIP processes. However, we are concerned that given the complexity of the issues and the timing of the public outreach (both a short time period and later in the RTP update process), this has not been adequate.

We appreciate Metro's efforts to improve its Title VI analysis. To succeed with Climate Smart Communities, meet Metro's six desired outcomes, and comply with federal law means Metro should reevaluate its analysis and ensure that all its transportation investments – transit capital and operations funding, funding for roads and bridges, bicycle and pedestrian projects, etc... - fully address communities of concern, including evaluating them under Title VI and Executive Order 12898.

Thank you for consideration of our comments.

Sincerely,

A handwritten signature in black ink that reads "Mary Kyle McCurdy". The script is fluid and cursive.

Mary Kyle McCurdy, Policy Director and Staff Attorney
1000 Friends of Oregon

A handwritten signature in black ink that reads "Mara Gross". The script is fluid and cursive.

Mara Gross, Executive Director
Coalition for a Livable Future



June 20, 2014

Metro
600 NE Grand Ave
Portland, OR 97232

Ted Leybold,

Thank you for the opportunity to comment on Metro's Environmental Justice and Title VI assessment in advance of updating the Regional Transportation Plan (RTP) and Metropolitan Transportation Improvement Program (MTIP). It is clear that Metro has advanced its methodology in terms of identifying the thresholds to inclusively establish "communities of concern," areas with significant concentrations of people of color, low-income people, LEP populations, and both young and older residents. At the Community Cycling Center, equity is at the foundation of our vision and is critical in our mission to broaden access to bicycling and its benefits. We work every day to build vibrant communities where people of all backgrounds use bicycles to stay healthy and connected. We see the leadership role Metro plays in our region and want to ensure your continued success as a national model for regional government.

Metro's efforts and intentions are laudable, yet the methodology proposed will actually deviate from our region's equity goals and frustrate the intent and purpose behind Civil Rights and environmental justice laws and policies. The Community Cycling Center urges Metro to scale back the methodology based on the following recommendations, which will allow the agency to engage in a genuine process with regional equity stakeholders and environmental justice experts to collaboratively hone the methodology to more precisely ensure full Civil Rights protections and promote environmental justice objectives.

- (1) Withdraw consideration of the 80% Rule; it is a disfavored rule, is arbitrary and capricious, and compounds past inequities. All discrimination is unlawful.
- (2) Streamline and conflate the methodologies for disparate impact and disproportionate burden, as there is no practical distinction between them.
- (3) Ensure that communities of concern are only those communities that have concentrations of residents in excess of demographic thresholds.
- (4) Ensure that communities of concern are measured against appropriate comparison population; i.e., communities of color v. white communities.
- (5) Assess disparate impacts for public transit operations as well as capital.



- (6) Assess disparate impacts for all transportation programs and investments receiving federal assistance, including roads/highways and active transportation.
- (7) Commit to more effective public engagement process to develop more equitable methodology for future reviews, and work with stakeholders to diversify JPACT.

These recommendations are the minimum steps Metro must take to ensure that this current proposal moves forward in a manner that will not perpetuate racial and socioeconomic disparities. The consequences of this methodology are significant, and Metro's process in engaging potentially impacted communities has been insufficient. Metro must show a real commitment to meeting not only the letter but also the spirit of Title VI and Environmental Justice policies and regulations, and work with local experts, interested stakeholders, and representatives of communities of concern to develop an approach that is fair, accessible and inclusive. Please see the attached memorandum for specific comments and support.

Metro continues to play a leading role in our region around issues of environmental justice and the equitable access to active transportation options. The Community Cycling Center and our partners look forward to collaborating with Metro in the near future to develop a methodology and guidance that will actually reinforce and meet our shared goals around regional livability and equity.

Sincerely,

Mychal Tetteh, CEO
Community Cycling Center