

NOTE: This report represents findings used to inform early project activities and analysis. This report will be finalized in 2015 following the release of updated demographic information.

POWELL-DIVISION TRANSIT AND DEVELOPMENT PROJECT

Title VI and Environmental Justice
Demographic Baseline Analysis

DRAFT September 2014

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.

Powell-Division Transit and Development Project Transit and Development Project partners are the cities of Gresham, and Portland, Troutdale, Fairview and Wood Village; Multnomah county; Portland State University, Oregon Health & Science University, Portland Community College and Mount Hood Community College ; Oregon Department of Transportation; TriMet; and Metro.

Project website: <http://www.oregonmetro.gov/powelldivision>

Table of contents

Introduction	1
Purpose of this report	1
Environmental justice and civil rights as part of the planning and project development process	2
Environmental justice and civil rights as part of the Powell-Division Transit and Development Project.	3
Demographic information.....	5
Demographic Definitions	6
Demographic Thresholds and Geography to Locate Communities	7
Powell-Division Transit and Development Project Study Area	9
Existing low-income and racial and ethnic populations	11
Racial and ethnic minorities.....	12
Black or African American	14
Asian.....	15
American Indian and Alaska Native	17
Native Hawaiian and Pacific Islander	19
Hispanic or Latino	21
Poverty	22
Older Adults	24
Younger Persons	25
Disabilities	26
Considerations for outreach to low-income and minority populations	27
Limited English proficiency (To be updated in early 2015).....	29
Potential impacts to Title VI and environmental justice populations	39

Introduction

The Powell-Division Transit and Development Project is a phased planning effort to connect downtown Portland, Southeast and East Portland, and Gresham with high capacity transit and to create a coordinated land use strategy that will stimulate community economic development. The Powell-Division Transit and Development Project builds off recommendations from recent regional and community planning efforts including Metro's Regional High Capacity Transit System Plan and the East Metro Connections Plan, as well as local planning work such as the City of Gresham Transportation System Plan and the City of Portland Comprehensive Plan. High capacity transit in the Powell-Division corridor has been identified in these planning efforts to address demand to connect people to jobs and major education and workforce training sites, including Portland State University, Portland Community College and Mount Hood Community College.

Components of the Powell-Division Transit and Development Project include:

- Local land use planning to define a transit route, stop locations and connections and identify land use actions and investments to support livable communities.
- Transit alternatives assessment that will further define the route, service type, transit and associated pedestrian, bicycle and roadway improvements needed to provide high quality and high capacity transit service in this corridor.
- Identification of key community investments (regional, local, public and private) that will create synergy with proposed transit investments and support community economic development and livability.

The desired outcomes of the Powell-Division Transit and Development Project include:

- A Powell-Division development strategy that identifies and prioritizes needed projects to serve locally desired land uses and stimulate community and economic development centered on high capacity transit service.
- A transit solution that efficiently serves high demand corridor in the near term while recognizing physical constraints in the corridor as well as the limited local capital and operational funding for near-term implementation.

The outcome will be directed towards a federal funding request through Federal Transit Administration programs.

Purpose of this report

As part of the Powell-Division Transit and Development Project, a baseline demographic analysis is conducted to inform different aspects of the project. This work is required under federal regulations and guidance under Title VI of the Civil Rights Act of 1964 and Executive Order 12898 on Environmental Justice, but it is also a part of good planning practice. This report illustrates the results of the demographic analysis for three communities identified under federal regulations as well two additional communities of concern. The development of this demographic analysis served as the foundation for developing the public outreach program and lays the foundation for conducting analysis of impacts to the three communities based on the proposed land use strategy

and transit solution in later stages of the project. Typically the demographic analysis is a step undertaken with corridor planning efforts as part of required environmental analysis for federal purposes. However, based on the diverse characteristics of the corridor, the Powell-Division Transit and Development Project partners have determined it is in the best interest of the public and the project to begin the demographic analysis and outreach during the current early pre-planning and scoping phase. Draft analysis and maps were created in 2012 and shaped the early outreach for the project. This report, the early analysis and outreach will provide:

- A better understanding of the communities in the Powell-Division corridor,
- An opportunity to implement a strategy of early and often public engagement in the spirit of the National Environmental Policy Act and Moving Ahead toward Progress in the 21st Century (MAP-21). Relationships with Title VI and environmental justice communities on which to build during subsequent alternatives analysis or environmental impact analysis phases.

Environmental justice and civil rights as part of the planning and project development process

Planning processes or projects that may require some form of federal involvement, including funding or permits, must demonstrate compliance with federal regulations. Two of these federal requirements are Title VI of the Civil Rights Act of 1964 and Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations.” Title VI and the Executive Order applies to all federally supported programs and activities in the United States, and each federal agency is expected to promulgate and implement the legislation. For the United State Department of Transportation (DOT) and its implementing divisions, the following principles and definitions are used:

Title VI of the Civil Rights Act of 1964:

“no person in the United States of America shall, on the grounds of race, color or national origin, be excluded from the participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which Metro receives federal financial assistance.”¹

Environmental Justice:²

The term environmental justice was created by people concerned that everyone within the United States deserves equal protection under the country’s laws. Executive Order 12898, issued in 1994, responded to this concern by organizing and explaining in detail the Federal government’s commitment to promote environmental justice. Each Federal agency was directed to review its procedures and to make environmental justice part of its mission by identifying and addressing the impacts of all of its programs, policies, and activities on minority populations and low-income populations. The U.S. DOT issued DOT Order to Address Environmental Justice in Minority Populations and Low-Income Populations in 1997. The Federal Highway Administration (FHWA) and the Federal Transit Administration

¹ 42 U.S.C. §2000d and the Civil Rights Restoration Act of 1987, P.L. 100-259, 102 Stat. 28 (1988).

² U.S. Department of Transportation, “Transportation and Environmental Justice Case Studies,” Publication No. FHWA-EP-01-010, December 2000.

(FTA) have been working with their state and local transportation partners to make sure that the principles of environmental justice are integrated into every aspect of their transportation mission. Principals of Environmental Justice are to:

- Ensure the full and fair participation by all potential affected communities in the transportation decision-making process.
- Avoid, mitigate, or minimize disproportionately high and adverse human health and environmental impacts, including social and economic impacts, on minority and low-income populations.
- Prevent the denial of, reduction in or significant delay in the receipt of benefits by minority and low-income populations.

In planning and project development processes, the requirements of Title VI of the Civil Rights Act of 1964 and the Executive Order 12898 on Environmental Justice are demonstrated cyclically and continually. The demographic baseline analysis usually serves as the first step in the planning and project development processes to help inform and shape the community engagement and analytical processes undertaken. In planning processes, the demographic analysis may remain at a high-level looking across a broad geography. Whereas in project development, the demographic analysis is often the precursor analytical work in preparation for the environmental review (commonly referred to as environmental impact statements or environmental assessments). Environmental review is required under the process outlined in Executive Order 12898 (EO 12898) and the USDOT order, where consideration of environmental justice issues must be assessed when evaluating any activity which involves a federal action. While environmental review requires consideration of environmental justice issues, the analysis must also be consistent with Title VI of the Civil Rights Act as both are decreed by the federal government.

Per federal rules, the demographic analysis broadly includes low-income, minority (identified through the U.S. Census Bureau as the racial minorities of Black, Asian, Native American/Alaskan and Pacific Islander/Native Hawaiian and the ethnic minority of Hispanic) and limited English-language proficiency communities. However, the demographic analysis can be extended to include minority groups not formally noticed in Title VI and environmental justice language (if they are in large concentrations in the project area) and other groups that may be disproportionately impacted or that may not know about the project through traditional outreach methods. Examples of commonly assessed additional populations include older adults and younger persons.

Recognizing the different communities within a general study area is an important component for shaping the public involvement and engagement program, especially to groups which may not speak English well, do not have the opportunity to attend open houses as scheduled, or easily read highly technical documents. The activities below are an effort to go above and beyond the general outreach efforts to include as many individuals and organizations from the communities identified above as possible.

Environmental justice and civil rights as part of the Powell-Division Transit and Development Project

Metro and project partners identified a need and preference to conduct a demographic analysis in the pre-planning/pre-project development phase to shape, inform and recognize the unique

demographic characteristics within the Powell-Division corridor. In the following sections of the demographic baseline are the results of the analysis. Based on the results, this report includes the approach taken and planned for public involvement efforts. The public involvement recommendations consider take into special consideration all potentially affected populations that are demographically identifiable. This is in recognition the presence of communities that may be disproportionately impacted or may not receive information through traditional outreach methods, which include, but are not limited to, youth, seniors and individuals of different ethnic groups and those with limited English proficiency. Those identified as needing targeted outreach efforts will be given additional attention moving forward in the public involvement process.

Demographic information

The Powell-Division Transit and Development Project Transit and Development Project study area includes portions of the cities of Portland, Gresham, Troutdale, Fairview and Wood Village and Multnomah County. Demographic data for this analysis of neighborhoods and communities were obtained from three main sources: the U.S. Census Bureau’s 2010 Decennial Census, the American Community Survey (2008 to 2012 and 2006 to 2010), and the State of Oregon Department of Education School Enrollment (2011-2012). Some of the data analysis draws from recent demographic assessment work recently conducted by Metro and project partners. This includes the language ability analysis which comes from Metro’s Limited English Proficiency agency-level “four factor analysis” conducted in 2013. To determine priority areas for Title VI and environmental justice outreach, the analysis identifies census block or tracts³ where the densities of the specified populations are greater than the regional average or the average of the study area based on initial analysis review.⁴

⁴ See Appendix B, Population analysis methodology for discussion for normalizing the demographic data to people per acre.

Demographic Definitions

For the purposes of the demographic baseline analysis, the demographic definitions listed in Table 1 are used to identify different communities in the Powell-Division Transit and Development Project study area. These definitions were developed from information provided by the U.S. Census Bureau and research of other recent demographic analyses conducted within the Portland metropolitan region. In previous processes, including Metro’s recent Title VI and Environmental Justice assessment for the 2014 Regional Transportation Plan and the 2015-2018 Metropolitan Transportation Improvement Program, opportunity to comment on the technical input, including the definitions, was provided.

Table 1. Definitions of Demographic Populations and Data Sources

Community	Definition	Data Source
People of Color ⁵	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.	U.S. 2010 Decennial Census – Block level data
Black or African American	Person having origins in any of the Black racial groups of Africa. It includes people who indicated their race(s) as “Black, African Am., or Negro” or reported entries such as African American, Kenyan, Nigerian or Haitian.	U.S. 2010 Decennial Census – Block level data
American Indian and Alaskan Native	Person having origins in any of the original peoples of North and South America (including Central America) and who maintains tribal affiliation or community attachment. This category includes people who indicated their race(s) as “American Indian or Alaska Native” or reported their enrolled or principal tribe, such as Navajo, Blackfeet, Inupiat, Yup’ik, or Central American Indian groups or South American Indian groups.	U.S. 2010 Decennial Census – Block level data
Asian	Person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam. It includes people who indicated	U.S. 2010 Decennial Census – Block level data

⁵ The decennial census also collects demographic information regarding people who identify as other race and/or two or more races. For the purposes of the demographic baseline analysis, the other race and two or more race information was not included because it was determined the limited English proficiency analysis and engagement with project partners (who have a better understanding of the demographic profile of the study area) would be means of capturing more meaningful information to inform the public involvement program. The other race and two or more race information as standalone datasets did not appear to provide a level of information to provide meaningful information. Additionally, two or more races are likely reflected in the demographic mapping of individual racial and ethnic communities.

	their race(s) as “Asian” or reported entries such as Asian Indian, Chinese, Filipino, Korean, Japanese, Vietnamese, and Other Asian or provided other detailed Asian responses.	
Native Hawaiian and Other Pacific Islander	Person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands. It includes people who indicated their race(s) as “Pacific Islander” or reported entries such as “Native Hawaiian,” “Guamanian or Chamorro,” “Samoan,” and “Other Pacific Islander” or provided other detailed Pacific Islander responses.	U.S. 2010 Decennial Census – Block level data
Hispanic or Latino	Person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin regardless of race.	U.S. 2010 Decennial Census
Persons with Low-Income	Persons living at or below 185% of the federal poverty guidelines. As a reference, the federal poverty guideline for a 1-person household for 2014 is \$11,670 and 185% of the guideline is \$21,590.	American Community Survey 2008-2012 Tract level data
Persons with Limited English Proficiency	Persons who identify in the U.S. Census Bureau’s American Community Survey as speaking English “less than very well.”	American Community Survey 2006-2010
Younger Persons	Persons who are 5 to 17 years of age as of the U.S. Census Bureau’s 2010 census.	U.S. 2010 Decennial Census – Block level data
Older Adults	Persons who are 65 years of age or older as of the U.S. Census Bureau’s 2010 census.	U.S. 2010 Decennial Census – Block level data

Demographic Thresholds and Geography to Locate Communities

To locate the different populations within the Powell-Division study area, a set of demographic thresholds were developed in order to identify areas where certain populations resided in high concentrations. This is in part because the demographic information provided from the U.S. Census Bureau geospatial datasets provides a general locality of persons, but not the exact pinpoint location. The geospatial datasets are also provided at different scales with different levels of attributed demographic information. For the Powell-Division Transit and Development project demographic baseline analysis, two different scaled geospatial datasets are used: census blocks and census tracts. The census block level data, as the smallest analytical geometry, is being used to identify racial and ethnic minorities in the study area while the census tract data is being used to identify persons with low-income and persons with limited English proficiency. The general size a census block generally corresponds to a city block and defined by infrastructure (i.e. a roadway) or environmental boundaries, but can be larger in rural areas and smaller in dense urban areas. A census tract is a grouping of many census blocks. Also a key difference to understand between the

census block and census tract data is that the census tract data represents demographic information taken from the American Community Survey rather than the decennial population count. In utilizing survey data, additional factors must be taken into account in selecting analytical geographies, such as margin of error and coefficients of variation. The census tract data for persons with low-income and persons with limited English proficiency is smallest unit of measure before the demographic information becomes unreliable due to high margins of error.

Because census geographies represent the demographic statistics for a specified area, the metric to identify the locations of certain populations (i.e. people of color or persons with low-income) is population density. The use of population density rather than a regional rate (i.e. average) of the population is to recognize the certain areas have significant concentration of population. In using a regional rate, the analysis may not fully illustrate the demographic landscape of the project study areas. Appendix B provides greater detail and rationale for using population density as the metric for identifying thresholds for locating certain demographic communities.

While population density is the metric for determining population thresholds, the regional rate of population density is used as the main benchmark for determining the demographic density thresholds. For example, this means the regional population density for people of color at .57 persons of color per acre is the threshold for identifying people of color in the Powell-Division study area. However, for the persons with low-income demographic population, the study area rate (i.e. average) was used because the regional rate threshold illustrated the entirety of the study area being above average, lower-income populations. Use of the study area rate provided further illustration of where in the study area there is concentrated poverty. The use of census tract data for the analysis is partially an explanation for the result of the entire study area being above the regional rate for persons with low-income, but the result also demonstrates in general the Powell-Division study area is predominately an area of lower incomes. The population density thresholds are listed in Table 2.

Table 2. Thresholds for Locating Populations

Community	Threshold
People of Color	People of Color population density greater than the regional average. The regional average population density is .57 persons of color per acre.
Black or African American	Black or African American population density greater than the regional average. The regional average population density is .08 Black of African American persons per acre.
American Indian and Alaskan Native	American Indian and Alaskan Native population density greater than the regional average. The regional average population density is .01 American Indian and Alaskan Native persons per acre.
Asian	Asian population density greater than the regional average. The regional average population density is .15 Asian persons per acre.
Native Hawaiian and Other Pacific Islander	Native Hawaiian and Other Pacific Islander population density greater than the regional average. The regional average population density is .01 Native

	Hawaiian and Other Pacific Islander persons per acre.
Hispanic or Latino	Hispanic or Latino population density greater than the regional average. The regional average population density is .26 Hispanic or Latino persons per acre.
Persons with Low-Income ⁶	Population density of persons with low-income greater than the Powell-Division study area average. The study area average is 2.0 persons with low-income per acre.
Persons with Limited English Proficiency ⁷	Two different thresholds are used for identifying language specific limited English proficiency (LEP) populations. If either threshold is triggered, then the area is identified as a language specific LEP area. There is a limited English proficiency language population in aggregate (regardless of language) prevalence of 5 percent or greater; or There is a limited English proficiency language population in aggregate (regardless of language) prevalence 1,000 persons or greater. ⁸
Older Adults	Older adult population density greater than the regional average. The regional average population density is .236 older persons per acre.
Younger Persons	Younger persons population density greater than the regional average. The regional average population density is .352 younger persons per acre.

Powell-Division Transit and Development Project Study Area

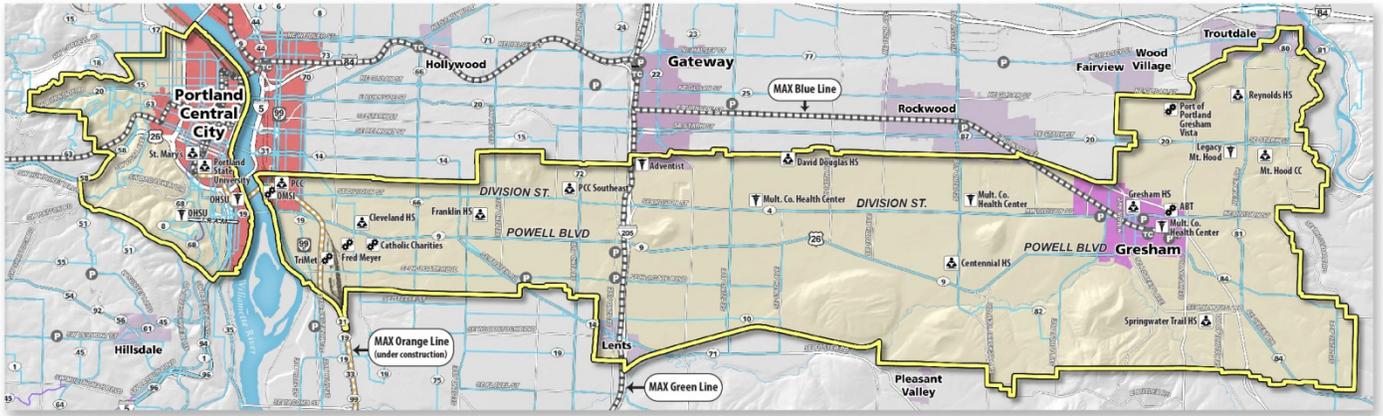
Figure 1 illustrates the general area being evaluated for a high capacity transit solution and coordinated land use strategy for the Powell-Division Transit and Development Project. The outcomes of the Powell-Division Transit and Development Project looks to connect downtown Portland with Downtown Gresham and Mt. Hood Community College through southeastern Portland. The study area encompasses a 16-mile span heading west to east with nearly a dozen higher education institutions, over a dozen secondary schools, and nearly 20 large employers.

⁶ The study area average population density of persons with low-income was used because the regional average population density for low-income showed the entire study area above the regional average population density for low-income. This is partially a by-product of the low-income data having to be used at the census tract level, but also an indicator the general area has a high concentration of low-income persons. To locate more specifically areas of concentrated low-income populations in the study area, the thresholds were scaled to the study area rather than the region.

⁷ Per the Department of Justice’s Safe Harbor provision, Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, 67 FR 41464, June 18, 2002.

⁸ Ibid.

Figure 1. The Study Area Map



Existing low-income and racial and ethnic populations

Figures 2 through 10 below depict locations by census tracts and blocks in the Powell-Division Transit and Development Project Transit and Development Project study area of five populations for additional consideration as required under Title VI and Executive Order 12898 on environmental justice. These populations are: racial and ethnic minorities, persons with low-income, persons with limited English proficiency, older adults, and younger persons. The figures illustrate in the study area where these populations exceed population density thresholds (as identified in Table 2).

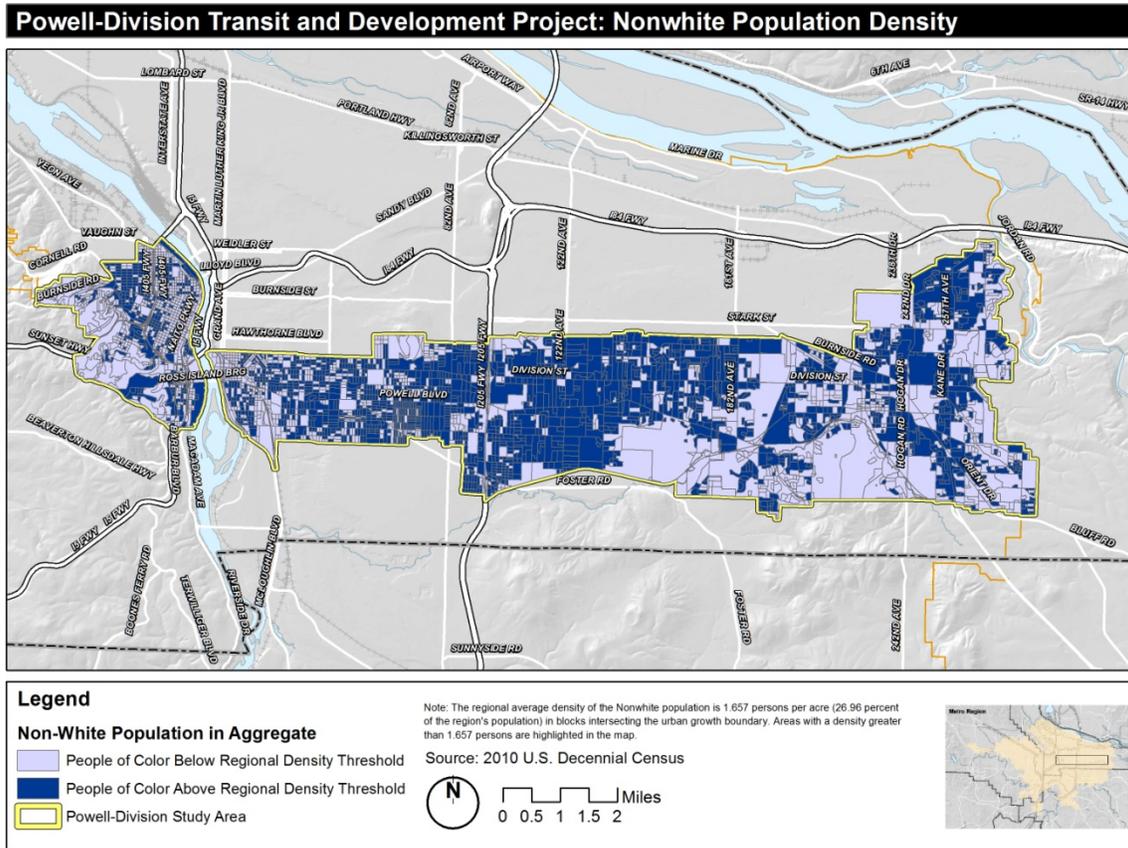
Racial and ethnic minorities⁹

Figure 2, Nonwhite population, identifies the blocks locations where nonwhite/racial minority individuals reside in densities above the regional average of 1.657 people per acre (26.96 percent of the regional population). Racial and ethnic minority populations are dispersed throughout the entire Powell-Division study area corridor with large clusters within the center of the study areas from Interstate 205 to Southeast 148th Avenue. Prevalence of people of color is seen in smaller pockets in downtown Portland, especially in high densities around Portland State University (PSU) and in the Pearl District. The concentration of people of color near PSU may be attributed to international student housing. Once east of the Willamette River, the concentration of people of color is scattered until Southeast 20th Avenue. East of 20th Avenue, concentrations of people of color predominates the study area to 181st Avenue in Gresham. Most of the blocks north and south around Powell Boulevard and Division Street, from Southeast 20th Avenue through 181st Avenue have densities of people of color above the regional average.

In entering Gresham from Portland, there is a cluster of blocks where Powell Boulevard curves toward the northeast that also shows a high concentration of people of color. Then, east of Main Street and in the eastern Gresham section of the study area, the concentration of people of color spans north and south, towards and into Troutdale, in fairly large contiguous clusters. In the small number of blocks which do not have a concentration of people of color above the regional average, some of these blocks coincide with natural features including Powell Butte, where the presence of any demographic group is low.

⁹ Per U.S. Census Bureau data collection practice, “race” categories are distinct from the Hispanic/non-Hispanic “ethnicity” category. For the purposes of the demographic baseline analysis, racial and ethnic minorities are illustrated in aggregate as well as by individual race and ethnicity.

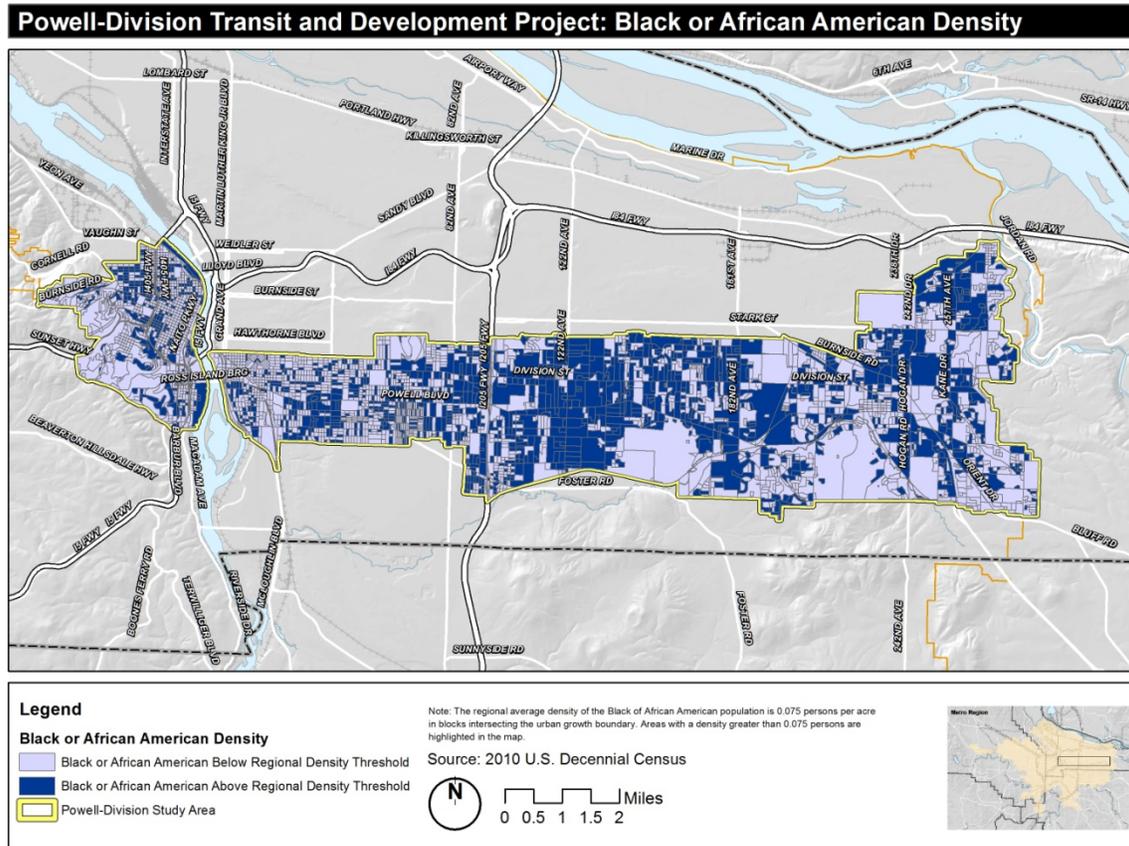
Figure 2. Nonwhite population



Black or African American

Figure 3, Black or African American population, identifies clustered block locations where Black individuals reside in densities above the regional average of 0.075 people per acre (3.3 percent of the study area population). The majority of Black or African American populations in the Powell-Division study area are located in concentration from Southeast 112th Avenue to 148th Avenue in the blocks north and south of Powell Boulevard and Division Street. Only a handful of blocks in the area between 112th Avenue to 148th Avenue have below the regional average density of Black or African American populations. Other clusters of Black or African American populations are within the study area include 148th Avenue north of Division Street traveling continuously southeast to Powell Boulevard to Southwest Towle Avenue and in Gresham north of Division Street towards Troutdale. Downtown Portland also shows concentrated areas of Black or African American population west of Interstate 405.

Figure 3. Black or African American population



Asian

Figure 4, Asian population, identifies clustered block locations where Asian individuals reside in densities above the regional average of 0.149 people per acre (7.64 percent of the study area population). The Asian population is higher than the regional average density throughout the majority of the Powell-Division study area. The largest concentrated areas include: downtown Portland running contiguously north and south in the blocks west of Interstate 405 and east of Southeast 28th Avenue to Northwest Birdsdale/Southeast 202nd Avenue. The blocks north and south in the large segment of Powell-Division study area have a higher than regional average density of Asian populations with only a small number of blocks not showing a higher than regional average density of Asians. Once in the northeast Gresham/Troutdale area, the concentration of Asians is mostly near the Mount Hood Community College. There are also concentrated clusters north of Division Street east of Main Street and south of Southeast Powell Valley Boulevard east of Palmsblad Road.

The census data used in Figure 4 does not distinguish between ethnicities or ancestral countries of origins within the Asian group. The limited English proficiency maps illustrate more detailed information regarding ethnicities or ancestral countries of origin within the Asian population in the study area. However, the demographic baseline does not make a presumption of a direct correlation between the language data and the larger population may be inaccurate.

American Indian and Alaska Native

Figure 5, American Indian and Alaska Native population, identifies locations where American Indian and Alaska Native (AIAN) individuals are grouped in densities above the regional average of 0.013 people per acre (0.78 percent of the study population).¹⁰ AIAN populations are dispersed throughout each city in the corridor with the exception of southern and eastern parts of Gresham and the population almost fades out stepping out of downtown Portland on the west side of Interstate 405. There is a concentrated cluster of approximately 36 blocks of AIAN population just east of center of the study area bounded by Southeast 112th Avenue to the west to 148th Avenue to the east. Additionally, the area in Gresham on Powell Boulevard, just north of the Springwater trail and downtown areas in Portland have an above average population of AIAN individuals. Downtown Gresham and around Mount Hood College is above the regional average density of AIAN populations.

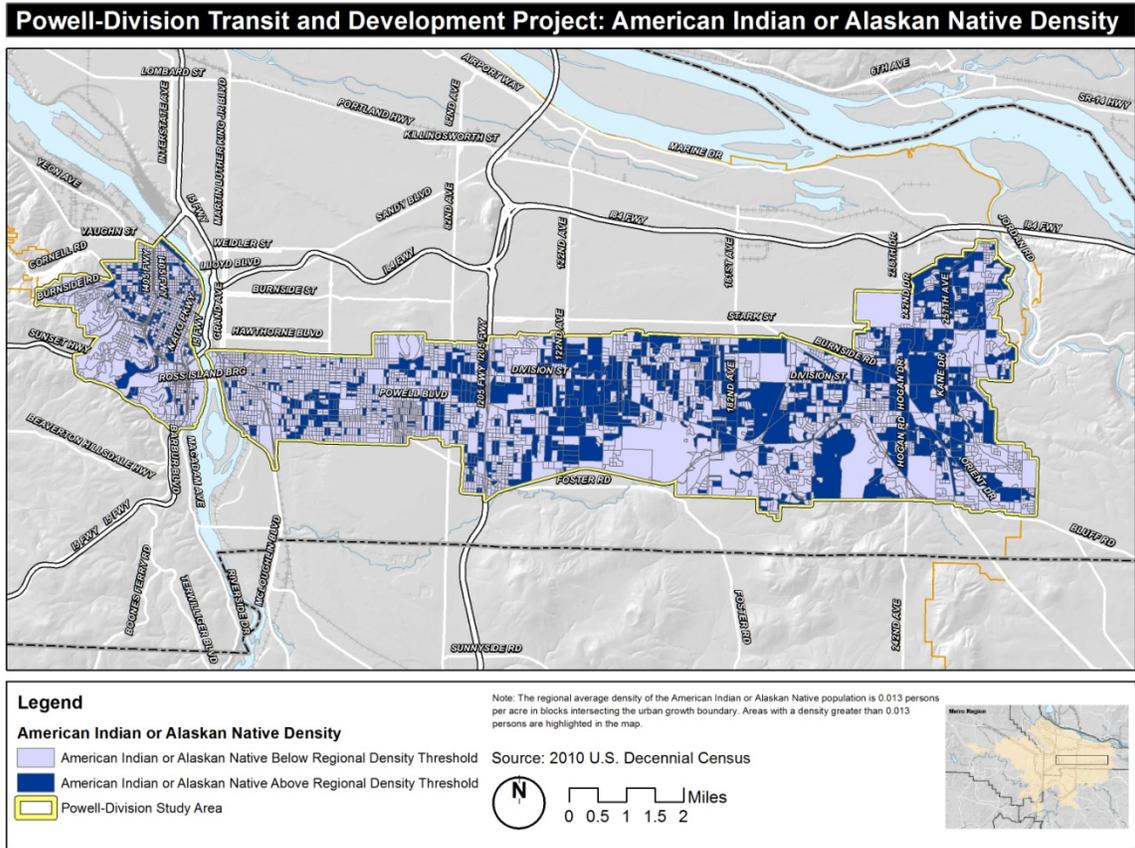
¹⁰ Project partners are sensitive to the argument that corridor and regional population numbers for Native American and Alaska Native residents are undercounted by the 2010 U.S. Census data for “Native American and Alaska Native alone” by as much as, or more than, 100 percent:

“Currently, official Census Bureau counts (including the Bureau’s American Community Survey, or ACS) can be tallied for people who either mark one “race” box or people who multiply identify with more than one race. Figures for people who mark/choose only one racial identifier are reported under “alone” statistics, while people who choose more than one identifier are reported under “alone or in combination” figures. For the Native American community in Multnomah county, 2009 ACS estimates of the population show 10,486 people as American Indian and Alaska Native alone and 21,533 as American Indian and Alaska Native alone or in combination with one or more other races. This means that about half of the Native American population in the county identifies as only one race. Our point here is that much of our community is what is typically known as “mixed race” and thus disappear when researchers and policy makers use our “alone” figures to define the size of our community. Not only is the community typically known as mixed race, but there is a cultural norm in the Native community that affirms the fullness of one’s heritage when one self identifies – a practice that runs contrary to the conventions of policy on racial identification.”

Curry-Stevens, A. Cross-Hemmer, A., & Coalition of Communities of Color, *The Native American Community in Multnomah County: An Unsettling Profile*, page 13, Portland State University, 2011.

Presuming an error in undercounting Native American and Native Alaskan mixed-race individuals is uniform, such an undercount would not affect this density analysis, since it relies on comparing local and regional density. Outreach to the AIAN community would not be affected, because this analysis highlights areas of outreach focus where population density is above the regional average not a determination of whether to make such efforts.

Figure 5. American Indian or Alaskan Native population



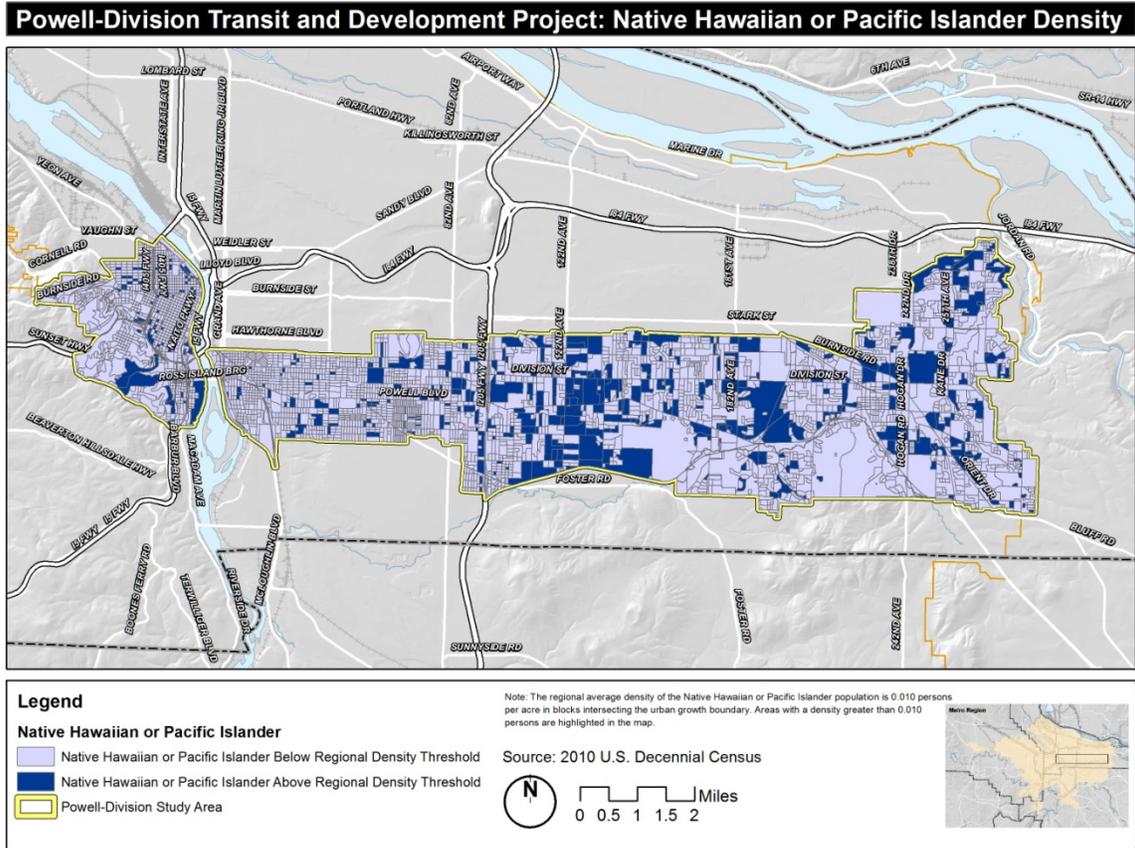
Native Hawaiian and Pacific Islander

Figure 6, Native Hawaiian and Pacific Islander population, identifies locations where Native Hawaiian and Other Pacific Islander (NHPI) individuals reside in densities above the regional average of 0.010 people per acre (0.49 percent of the study area population). NHPI populations overall are not as prevalent in the Powell-Division study area, but concentrated areas include: clusters east of Southeast 122nd Avenue to 140th Avenue on blocks north and south of Powell Boulevard and Division Street as well as along Powell Boulevard and Division Street between Southeast 181st Avenue and Northwest Birdsdale Avenue. Throughout the remainder of the study area, pockets of concentrated NHPI populations emerge in Gresham north of downtown, North Gresham into Troutdale, and in southern sections of downtown Portland.

It is important to note when reviewing figures 5 and 6 that while AIAN and NHPI population maps suggest total populations for these groups are high, this is actually because the average person per acre threshold is low (e.g., 0.010 people per acre for the NHPI and .013 people per acre for the AIAN population compared to 0.149 people per acre for the Asian population).¹¹ Therefore, the total population is significantly lower in comparison to the other race/ethnic groups in the study area. Total numbers identified in the census block provides total numbers of NHPI individuals to give a better understanding of where and how to target these populations through public involvement efforts.

¹¹ Or as much as 0.023 people per acre for AIAN, taking into account the question of undercounting mixed-race AIAN (footnote 11); a similar argument may be made for an undercount of NHPI mixed-race individuals.

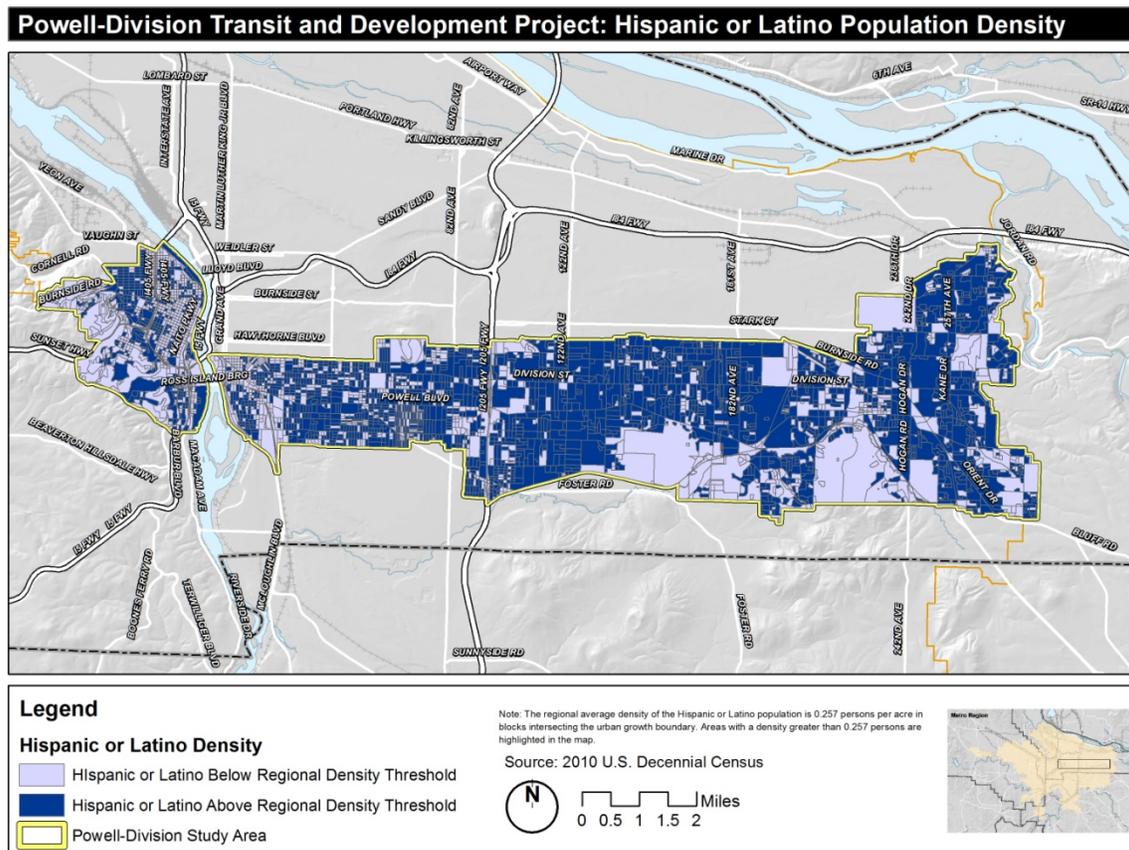
Figure 6. Native Hawaiian and Pacific Islander population



Hispanic or Latino

Figure 7, Hispanic or Latino population, indicates this population has the largest average person per acre in comparison to the other racial/ethnic groups identified in the maps above. Figure 7 identifies almost the entire Powell-Division study area where Hispanic or Latino individuals reside in densities above the regional average of .257 people per acre (11.36 percent of the study area population). Specifically, Hispanic or Latino populations in concentration are located in the northwestern portions of downtown Portland, east of Southeast 20th Avenue to downtown Gresham with some gap areas near Kelly and Powell Butte areas. Also east of downtown Gresham in the blocks north and south from Troutdale to the southern end of the study area there are contiguous concentrations of Hispanic or Latino populations. In addition, Figure 7 also identifies downtown Portland and downtown Gresham having a considerable amount of Hispanic population in most of the blocks.

Figure 7. Hispanic or Latino population



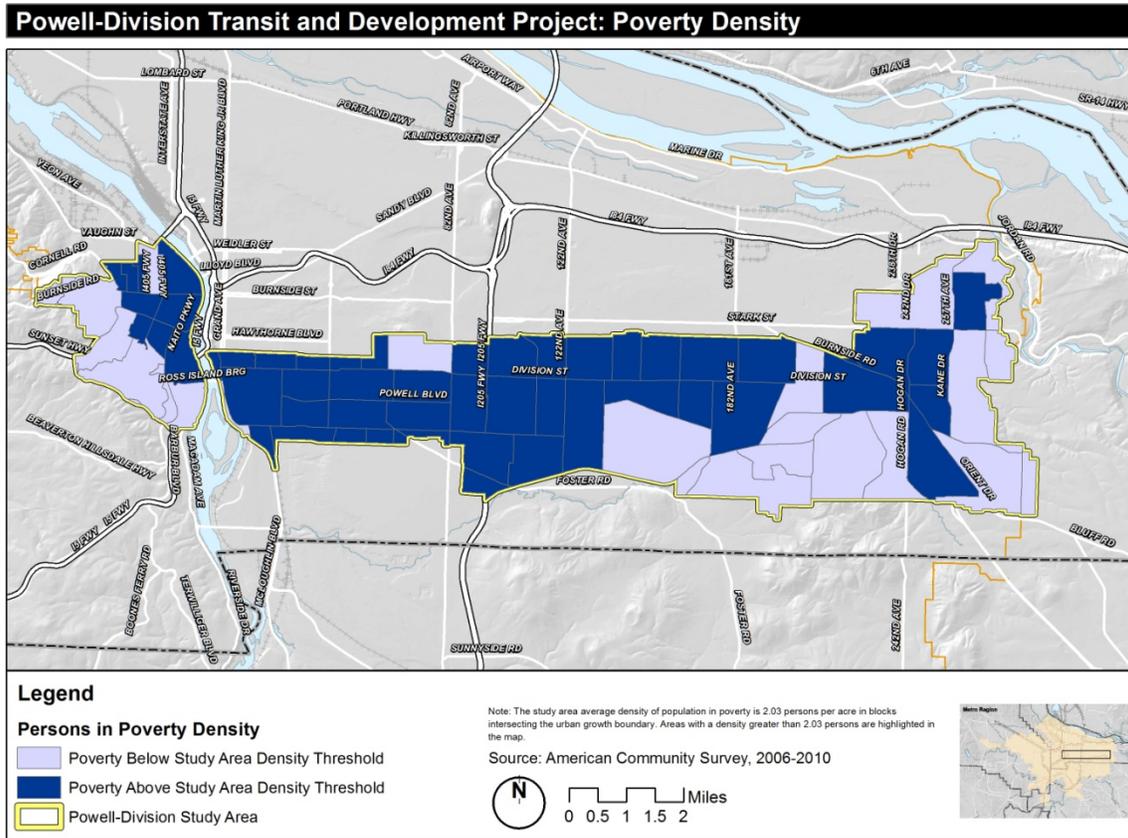
Poverty

Figure 8, Persons with Low-Income, identifies concentrations were defined as persons living at or greater than 185% of federal poverty guidelines. Low-income individuals are spread throughout the study area, on both sides of Powell Boulevard and Division Street and in downtown Portland. Of the total number of census tracts in the study area (80), nearly 70 percent have low-income populations existing in densities above the study area rate (more than 2.03 people per acre or greater than 27 percent of the study area population).¹² There is a small area starting around Southeast 190th Avenue to Southeast 212th/Northwest Wallula Avenue where the poverty concentration is below the study area rate. There are some areas south of Powell Boulevard past Southeast 136th Avenue that do not show a concentration of poverty greater than the study area rate. This may be attributed to these areas having less total population due to Kelly and Powell Butte. As the study area enters Gresham, the areas with concentrated poverty are clustered in and around downtown. There is also a pocket of higher poverty levels north of Stark Street between Southwest 257th Avenue and Southeast Troutdale Road as well as east of Hogan Road south of Powell Valley Road. Figure 8, Population in poverty, identifies that apart from around 25 East Portland block groups in the study area,

¹² U.S Census Bureau poverty thresholds for 2014 by size of family and number of related children under 18 years:

Persons in Family/Household	Poverty guideline
1	\$11,670
2	\$15,730
3	\$19,790
4	\$23,850
5	\$27,910
6	\$31,970
7	\$36,030
8	\$40,090

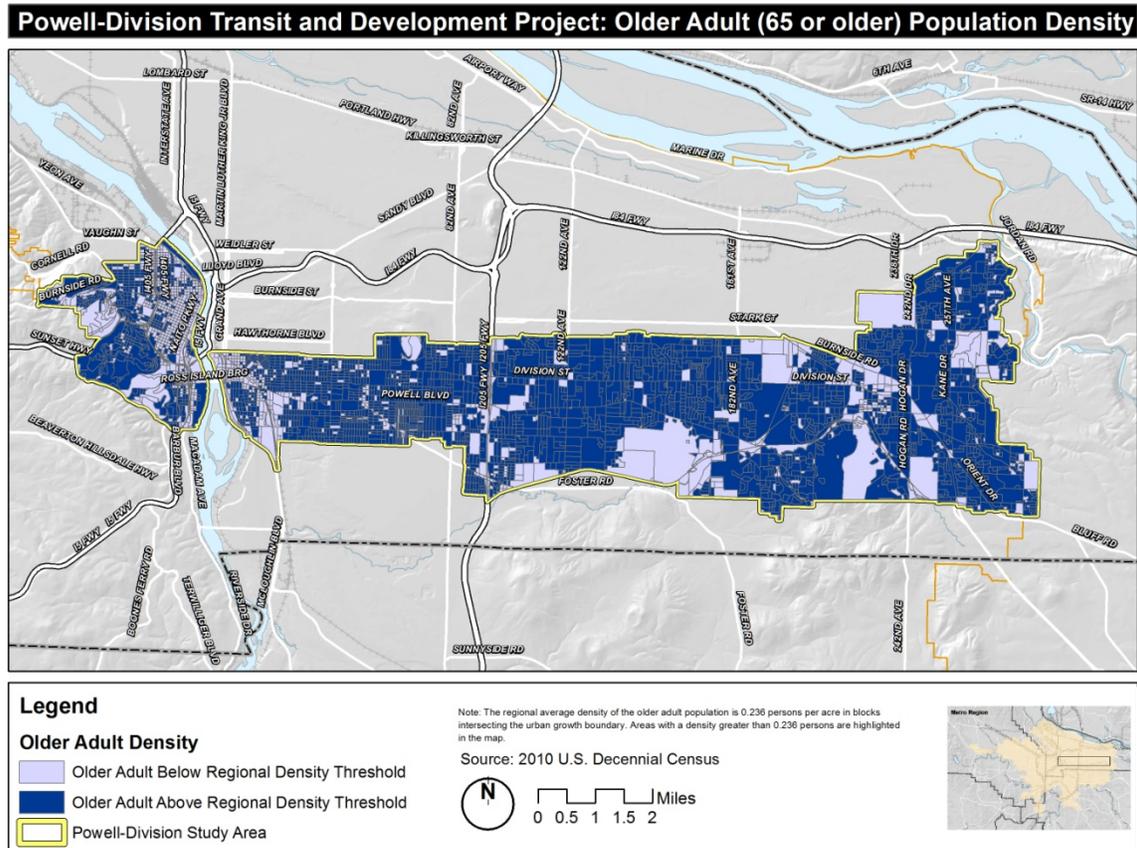
Figure 8. Population in Poverty



Older Adults

Figure 9, Older adults population identifies concentrations in the Powell and Division study area where older adults (65 years of age or older) individuals reside in densities above the regional average of .236 people per acre (10.6 percent of the study area population). Specifically, older adult populations in concentration are located throughout the Powell-Division study area. Interesting areas to note is the cluster of older adult populations in concentration in the Brooklyn neighborhood in Southeast Portland and throughout Gresham, Troutdale, Wood Village and Fairview. Interestingly, there is a small area around downtown Gresham where the older adult population is not greater than the regional rate per acre. Other areas which are not about the regional rate per acre are blocks adjacent to Powell Butte and just west of Salish Ponds City Park. The older adult population is above the regional rate in portions on the Westside of Portland in Northwest, the Pearl District, and in the southwest hills.

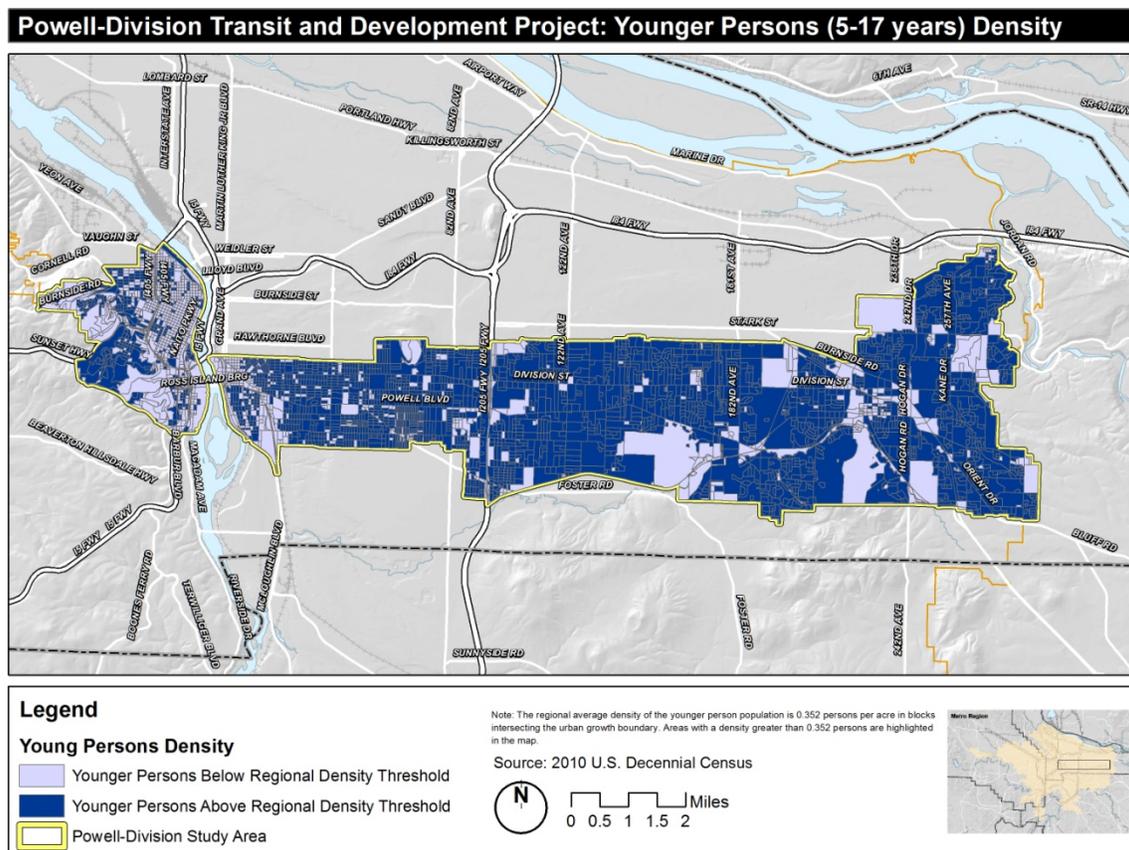
Figure 9. Older Adult population



Younger Persons

Figure 10, Younger persons identifies concentrations in the Powell and Division study area where young persons (5 to 17 years of age) individuals reside in densities above the regional average of .352 people per acre (14.7 percent of the study area population). Specifically, younger person populations in concentration are located throughout the eastside of Portland and in Gresham up towards Troutdale. Unlike other demographic populations, there is generally a lack of concentrated young persons in downtown Portland. In areas further west of downtown Portland, particularly in the southwest hills, the concentrations of younger persons is above the regional rate.

Figure 10. Younger Persons population



Disabilities

Individuals with disabilities are being identified through collaborative efforts with regional private and public organizations who serve this group. Often these organizations also serve low-income and elderly populations, so some overlap between populations is expected. TriMet is also a project partner and will provide data to help identify, and strategies to connect meaningfully with, people with disabilities that affect mobility.

Considerations for outreach to low-income and minority populations

Ongoing collaboration with local jurisdictions will continue to provide a deeper understanding of the existing low-income and minority populations within the study area that warrant targeted outreach efforts. These groups, and outreach to these groups, may not align and/or be reflected with the demographic baseline analysis or racial/ethnic category, but could still warrant targeted outreach. These groups are being identified through conversations being held with project partners. For example, from initial conversations and observed research, the project has identified a large eastern European population within the corridor.¹³ Project staff are continually working to gather and update information from non-traditional sources to help shape and inform the outreach and engagement work program for the Powell-Division Transit and Development project.

To ensure the project incorporates Title VI and environmental justice principles, project staff and decision makers have integrated equity into the project's foundation. Later phases of the project will include an analysis of impacts and benefits to environmental justice populations and their involvement in the development of mitigation actions. Equity is one of four project goals and equity measures are included within project screening and evaluation.

Broad and inclusive engagement is essential to developing a community-supported transit solution. Metro works with residents and community organizations that serve low income and minority populations to provide early, regular and meaningful opportunities to influence decision-making. Engagement efforts to reach the diverse communities in the corridor to date have included the following.

- Project's decision-making body (Steering Committee) includes communities of color and low income representatives
- The availability of translation services and Metro's nondiscrimination notice with Title VI complaint forms were included with all public meeting notifications
- Web content available in Spanish, some content available in Russian, Chinese and Vietnamese; translation hotline number accompanies this content
- Spanish factsheet
- Multilingual factsheet in Spanish, Russian, Chinese and Vietnamese 1-question in-person survey at community events and meetings; translated to Spanish, Russian, Chinese and Vietnamese
- Bus rider engagement that reaches communities of color and low income populations; materials available in Spanish, Russian, Chinese and Vietnamese
- Survey of Immigrant and Refugee Community Organization staff
- Public Steering Committee discussion on equity and anti-displacement strategies
- Youth engagement at the Youth Summit for Transit Justice and the Gresham Youth Advisory Committee
- Presentations and/or discussions with equity/ social justice organizations, including:
 - Immigrant and Refugee Community Organization

¹³ Metro conducted independent meetings with the cities of Portland, and Gresham and Multnomah County to review data on Title VI and environmental justice populations.

- East Portland Action Plan
- The Promise Ministries
- Asian Pacific American Network of Oregon
- Coalition for a Livable Future
- OPAL Environmental Justice Oregon
- Home Forward
- Human Solutions
- Catholic Charities
- Oregon Advocacy Council Office
- Participation in events or input opportunities that target communities of color, including:
 - all-Spanish transit service enhancement plan meeting
 - Jade District steering committee and community meetings
 - Immigrant Entrepreneurs as Economic Creators in East Portland Tour
 - Immigrant and Refugee Community Organization's Diversity Community Leadership Roundtable
 - participation in the East Portland neighborhood survey (Spanish, Russian and Vietnamese)
 - Jade District community meetings and Night Market
 - Native American Youth and Family Center's Neerchokikoo Honoring Powwow
 - East Portland neighborhood picnic
- Open house input board to improve bus experience (Spanish, Russian, Chinese and Vietnamese)
- Business engagement materials (Spanish, Russian, Chinese and Vietnamese)
- Powell-Division Equity work group
- Steering committee working group on equity and displacement
- Youth engagement through TriMet Service Enhancement Plan at Reynolds High School (Spanish, Somali, Arabic)

Limited English proficiency (To be updated in early 2015)

Individuals with limited English proficiency are protected under Title VI provision against national origin discrimination.¹⁴ In determining a plan to provide meaningful access to programs and events/activities to limited English proficiency persons, Metro conducted a preliminary four-factor analysis in 2013 using the methodology set forth by the agency's regional four-factor analysis for determining programming and resources to reach limited English proficiency populations. The regional four-factor analysis used guidance set out by the U.S. Department of Justice.¹⁵ The four-factor analysis includes the following four steps:

1. the number or proportion of limited English proficiency persons eligible to be served or likely to be encountered by the program or grantee
2. the frequency with which limited English proficiency individuals come in contact with the program
3. the nature and importance of the program, activity, or service provided by the program to people's lives
4. the resources available to the grantee/recipient and costs.

The Powell-Division Transit and Development Project applied a modified version of the regional four-factor analysis for the Powell-Division study area to gather an initial assessment of the limited English proficiency population for developing and informing the public involvement program. A modified version of the regional four-factor analysis was applied because forthcoming are the release of updated datasets from the U.S. Census Bureau and the Oregon Department of Education. Only the American Community Survey 5-year estimates were used to assess limited English proficiency considerations in this early phase and certain language disaggregation analysis including "Other Slavic Languages" and "Other Indo European Languages" is not conducted. The modified analysis was intended to give an initial assessment of limited English proficiency considerations in the early phase of the process for narrowing the transit alternatives in the corridor and the aligned development strategies, which to date, has informed the public involvement strategy for the project. The engagement approach is discussed further in the compendium public engagement report. The project team for the Powell-Division Transit and Development Project intend to conduct the full regional four-factor methodology for the Powell-Division study area in early 2015 with updated datasets and greater detail of the potential transit alternatives to be evaluated in depth.

The following sections describe the application of the regional four-factor analysis to the Powell-Division Transit and Development Project study area.

¹⁴ U.S. Department of Justice, Frequently Asked Questions about the Protection of Limited English Proficient (LEP) Individuals under Title VI of the Civil Rights Act of 1964 and Title VI Regulations, citing *Lau v. Nichols*, 414 U.S. 563, 569 (1974), et al., March 2011.

¹⁵ U.S. Department of Justice, Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, 67 FR 41455, June 18, 2002, issued pursuant to Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency, Aug. 11, 2000, incorporated by U.S. Department of Transportation, Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons, 70 FR 74087, Dec. 14, 2005.

Table 3 shows the highest prevalence of languages within the Powell-Division Transit and Development Project data collection area. The total population that speaks each language at home, followed by a break out of those who speak English “very well” and those that speak English less than “very well.” The focus of this analysis is on those with limited English proficiency; therefore, the concern for each language would be those who speak English less than “very well” (for the entire data table, see Appendix C, Languages spoken at home by ability to speak English for the population 5 years and older).¹⁶ As such, Table 3 also shows the percentage of the corridor population that speaks each language and speaks English less than “very well.”

Table 3. Highest prevalence of languages other than English, by population speaking the language at home.

Language spoken at home; English proficiency	Population in corridor	Language ability of corridor population	Percent of Total LEP population
Total Estimated Population in the Corridor	334,792		
Total English Proficiency		300,702	
Total Limited English Proficiency		34,090	
Spanish or Spanish Creole	26,431		
speak English "very well"		11,889	
speak English less than "very well"		14,542	42.7%
Vietnamese	5,936		
speak English "very well"		2,036	
speak English less than "very well"		3,900	11.4%
Chinese	7,570		
speak English "very well"		2,838	
speak English less than "very well"		4,732	13.9%
Russian	7,094		
speak English "very well"		2,940	
speak English less than "very well"		4,154	12.2%
Other Slavic languages	2,820		
speak English "very well"		1,306	
speak English less than "very well"		1,514	4.4%
Other Indo European languages	2,156		

¹⁶ *Ibid* at 41460, footnote 7: “The focus of the analysis is on lack of English proficiency, not the ability to speak more than one language... When using demographic data, it is important to focus in on the languages spoken by those who are not proficient in English.”

speak English "very well"	1,085	
speak English less than "very well"	1,071	3.1%

Source: U.S. Census Bureau, *Language spoken at home by ability to speak English for the population 5 years and over, 2006-2010 American Community Survey 5-Year Estimates*.¹⁷

The Department of Justice’s Safe Harbor provision sets out guidance for limited English proficiency language group prevalence at 5 percent of the limited English proficiency population in the study area/geography or 1,000 limited English proficiency persons, whichever is less, within the study area.¹⁸ For the Powell-Division Transit and Development Project study area, six languages meet the 5 percent or 1,000 persons threshold for those who speak English less than “very well”: Spanish/Spanish Creole, Vietnamese, Chinese, Russian, Other Slavic languages, and Other Indo European languages. However, it is important to note that in total, the limited English proficiency population in the study area comprises of 10.2% of the study area population. This is slightly above the regional average of 8.7% for total limited English proficiency population. Another interesting note is for the six languages identified, the estimated limited English proficiency population of those languages in the study area comprises of approximately half (50%) of that language’s study area population. For example, the estimated Russian population in the corridor is a little under 7,094 persons, but an estimated 4,154 are indentified as limited English proficiency. Lastly because of the size of the study area, while the six identified Safe Harbor language populations have significant limited English proficiency relative to their specific language population, the total language population usually comprises of less than 3% of the total study area population, with the exception of Spanish language speaking population which has an overall larger population. As an example, the residents who speak Vietnamese at home is 1.8% of the study area population and of those Vietnamese language speakers, those who speak English less than “very well” only make up 1.2% percent of the study area population.

It is important to note the different methodology used in the limited English proficiency or language analysis compared to the racial/ethnic group analysis discussed in the previous section. The racial/ethnic group analysis identified census tracts with racial/ethnic population densities greater than the regional average.¹⁹ In order to comply with the guidance provided for limited English proficiency outreach, specifically the four-factor analysis and the Safe Harbor provision, the language analysis focuses on the percentage of language speakers who speak English less than “very well” in a census tract regardless of population density. Additionally, the data source used for

¹⁷ 5-year estimates are “most reliable” per “When to use 1-year, 3-year, or 5-year estimates,” U.S. Census Bureau, American Community Survey, http://www.census.gov/acs/www/guidance_for_data_users/estimates/, last accessed March 1, 2012.

¹⁸ “The following actions will be considered strong evidence of compliance with the recipient’s written-translation obligations: (a) The DOJ recipient provides written translations of vital documents for each LEP language group that constitutes five percent or 1,000, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered...,” Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, 67 FR 41464, June 18, 2002.

¹⁹ See page 4 and Appendix A in reference to this methodology.

language analysis is the 2010 American Community Survey 5-year estimate rather than the decennial U.S. Census of 2010. The decennial census does not collect language information whereas the American Community Survey is an estimate of five years of data collected in surveys. Therefore, the information represented on Figure 11 is not expected to demonstrate a correlation with the information presented in Figures 2- 7 of this report.

Figures 11 through 15 illustrate the data collected for the prevalence of languages other than English spoken at home on a census tract level. The figures show where the number of these speakers are above 5 percent of the population and also highlight the areas where these over 5 percent of the population speaks a language besides English at home and speaks English less than “very well.”

Figure 11, areas of limited English proficiency shows where greater than 5 percent of the population speaks another language at home (regardless of actual language) and where greater than 5 percent of the individual language population speak English less than “very well.”

As Figure 11 shows where greater than 5 percent of the population speaks a language other than English or Spanish at home and highlights where greater than 5 percent of the population speaks one of those languages at home and speak English less than “very well.” The population which speaks English less than “very well” regardless of language are located mainly in the eastern section of the Powell-Division study area, particularly east of Southeast 50th Avenue. Only two census tracts within downtown Portland show higher than 5 percent limited English proficiency and one west of Southeast 50th Avenue to the Willamette River. The pattern of where limited English proficiency populations are located within the corridor also correlates to where different concentrations of racial and ethnic groups are present within the study area.

Figure 11. Areas where another language is spoken at home and with 5 percent or greater limited English proficiency.

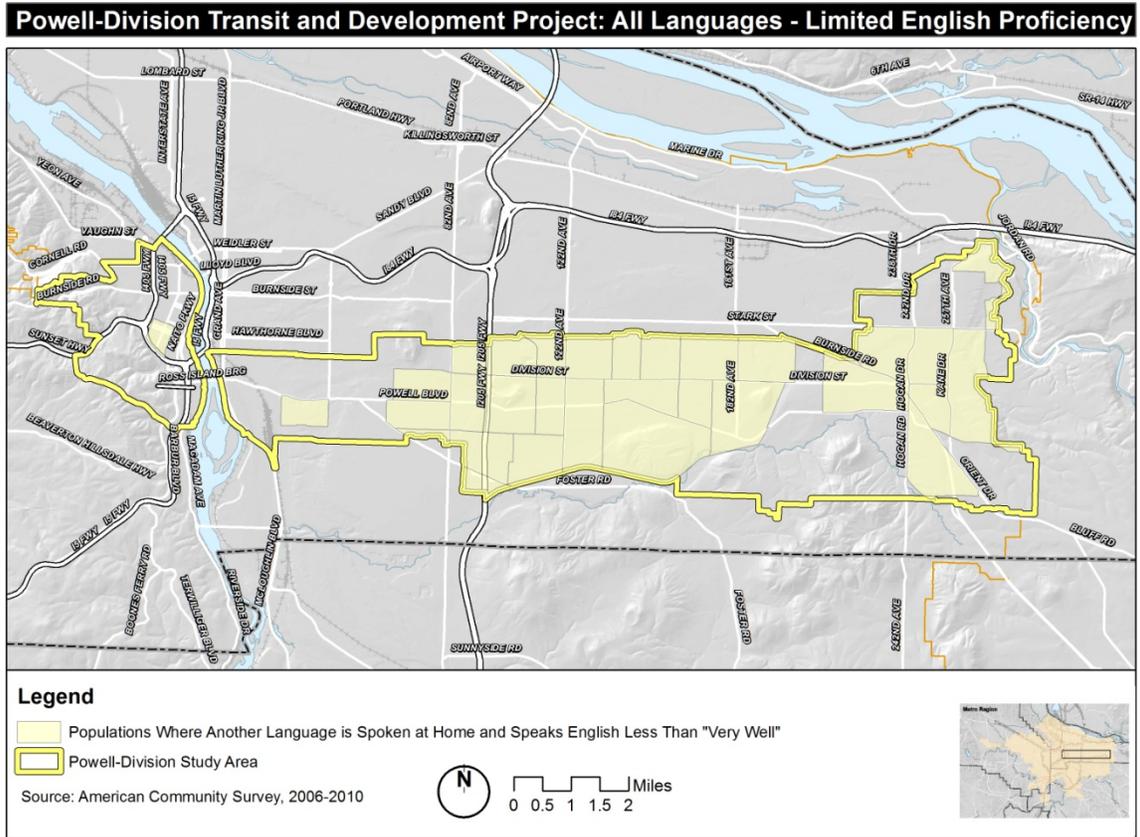


Figure 12, Spanish language spoken at home and with 5 percent or greater limited English proficiency, shows where greater than 5 percent of the population speaks Spanish at home and highlights where greater than 5 percent of the population speak English less than “very well.” The areas within the Powell-Division study area with greater than 5 percent Spanish speaking limited English proficiency are predominately east of Southeast 82nd Avenue and north of Powell Boulevard, particularly as the corridor enters into Gresham. In Gresham and heading north towards Troutdale, there are some small pockets where the Spanish speaking limited English proficiency is less than 5 percent. These areas appear to be in the northern portion of Gresham around Southwest 257th Avenue. A small pocket of Spanish speaking limited English proficiency is located south of Powell Boulevard west of Southeast Caesar Chavez Boulevard, but west of Southeast 82nd Avenue the Spanish speaking limited English proficiency appears more dispersed.

Figure 12. Spanish language spoken at home and with 5 percent or greater limited English proficiency.

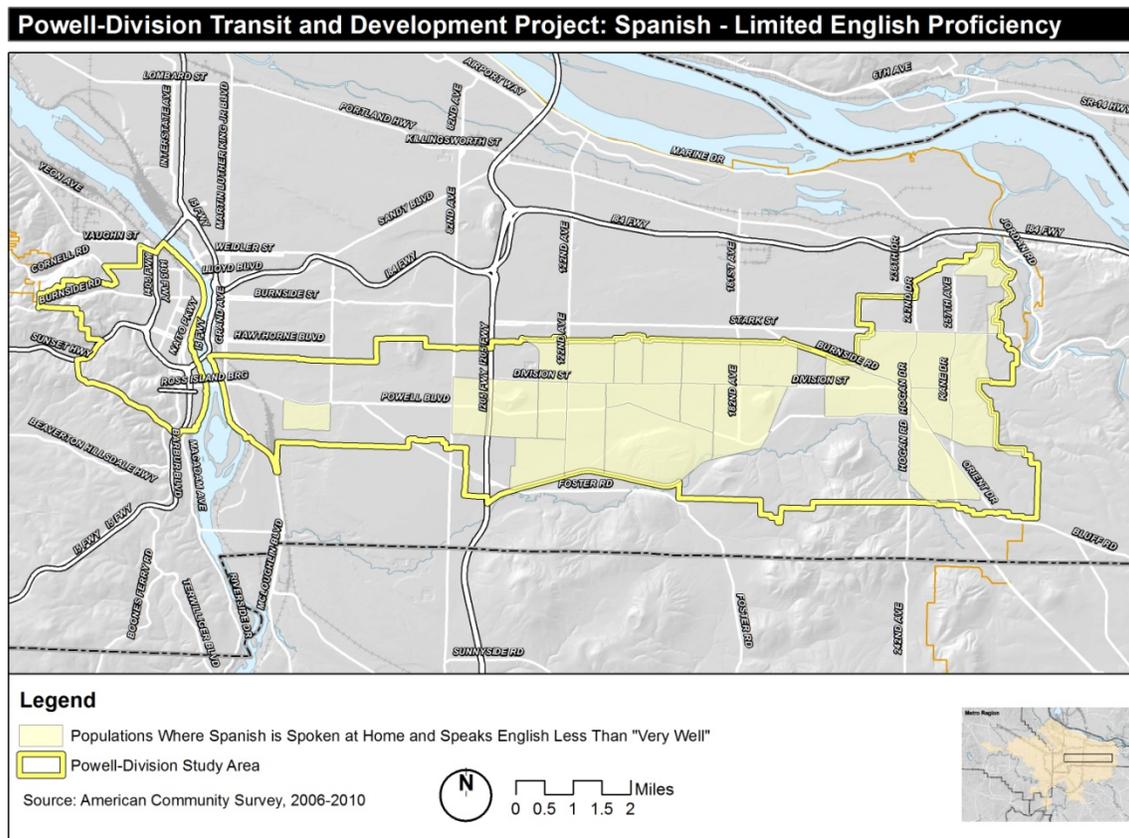


Figure 13, Russian language spoken at home and with 5 percent or greater limited English proficiency, shows where greater than 5 percent of the population speaks Russian at home and highlights where greater than 5 percent of the population speaks English less than “very well.” The areas of Russian speaking limited English proficiency are located in three clusters east of Southeast 82nd Avenue and west of Portland city limits, near Southeast 176th Avenue. A cluster is present along Interstate 205, spanning north and south of Division Street and Powell Boulevard and is confined between Southeast 82nd Avenue and Southeast 112th Avenue. Another cluster is east of Southeast 122nd Avenue to Portland city limits and remains mainly south of Powell Boulevard with a small segment reaching Division Street. Lastly the third cluster spans outside the study area south of Southeast Foster Road.

Figure 13, Russian language spoken at home and with 5 percent or greater limited English proficiency.

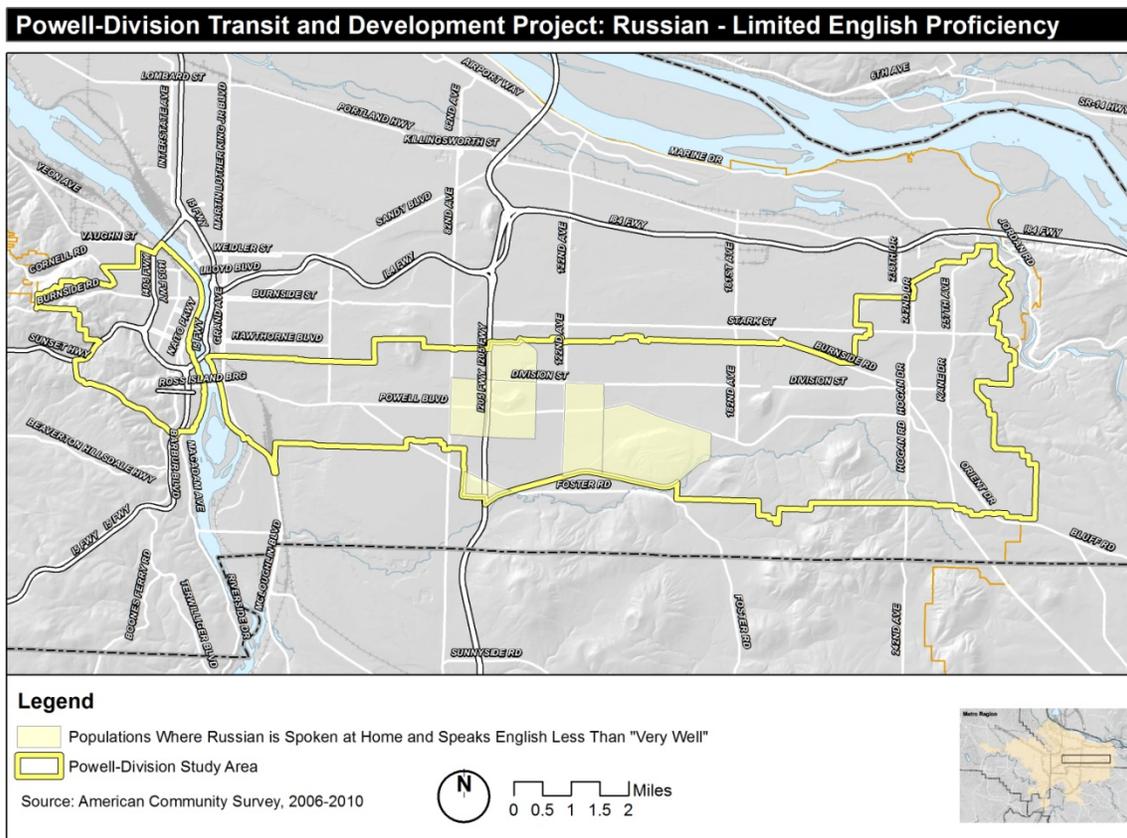


Figure 14, Vietnamese language spoken at home and with 5 percent or greater limited English proficiency, shows where greater than 5 percent of the population speaks Vietnamese at home and highlights where greater than 5 percent of the population speaks English less than “very well.” The Vietnamese speaking limited English proficiency population remains in three dispersed clusters bounded between Southeast 50th Avenue to Southeast 148th Avenue. The clusters nearly create a contiguous ring where the furthest east cluster is north of Division Street and just west of Southeast 148th Avenue. The next northern cluster begins at Southeast 82nd Avenue to Southeast 102nd/Southeast 112th Street north of Division Street and spans just outside of the study area. The last cluster remains south of Powell Boulevard following along Southeast Foster Road from near Southeast 60th Avenue to Southeast 122nd Avenue.

Figure 14, Vietnamese language spoken at home and with 5 percent or greater limited English proficiency.

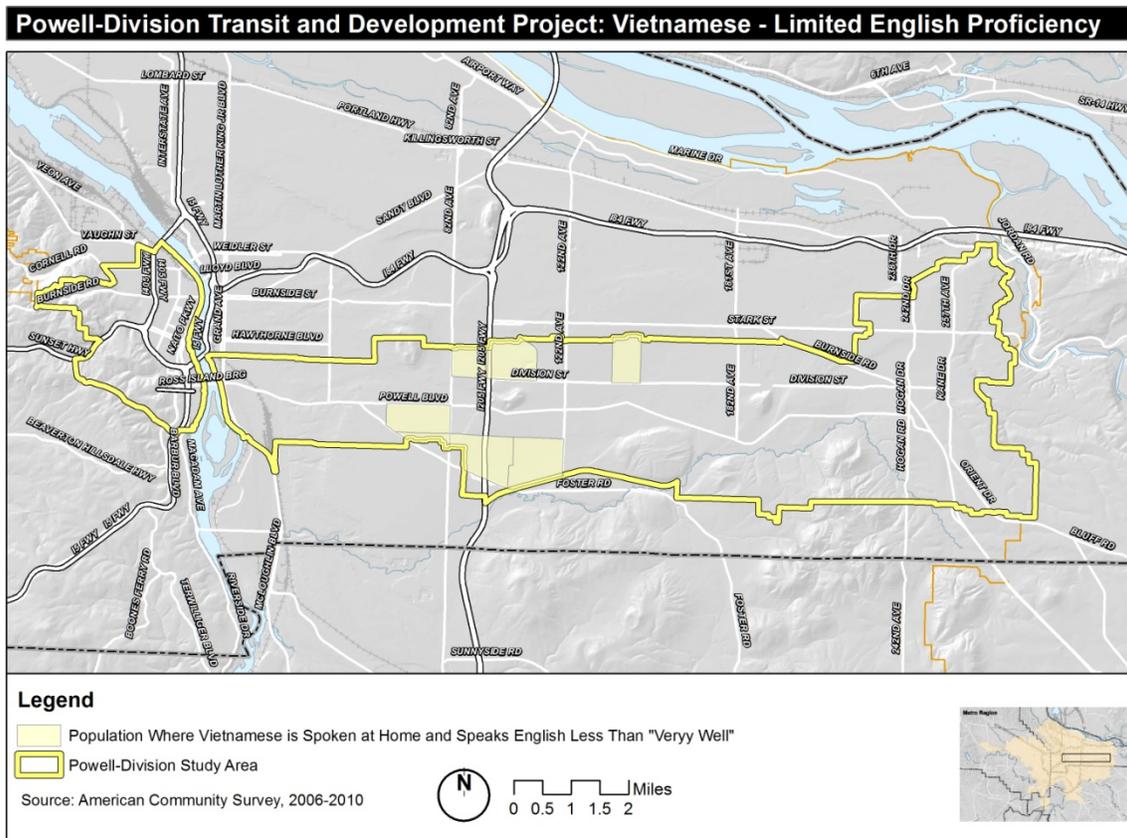
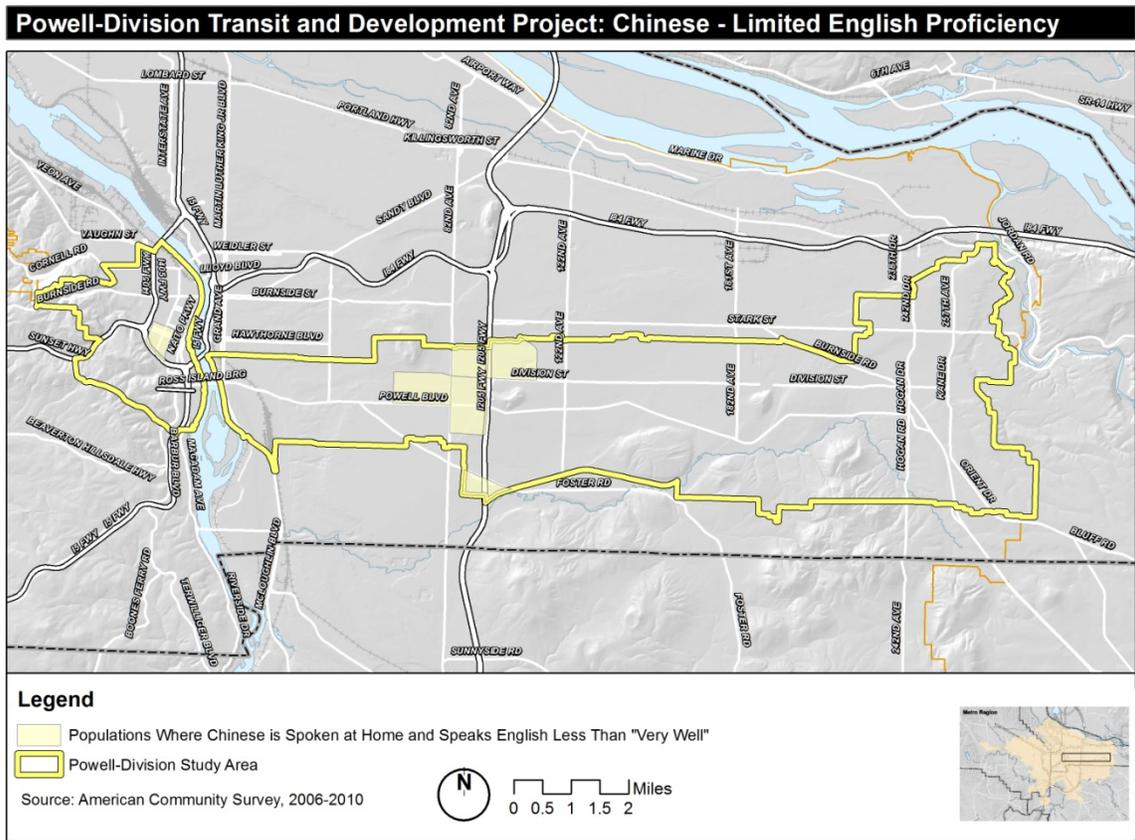


Figure 15, Chinese language spoken at home and with 5 percent or greater limited English proficiency, shows where greater than 5 percent of the population speaks Chinese at home and highlights where greater than 5 percent of the population speaks English less than “very well.” Unsurprisingly, the Chinese speaking limited English proficiency areas are concentrated along Southeast 82nd Avenue and Interstate 205 spanning north and south in the Powell-Division study area. The concentrated cluster runs north and south of Division Street and Powell Boulevard, but there is a gap south of Southeast Holgate Boulevard before another census tract south of Southeast Foster Road appears. Only one census tract adjacent, but west of Southeast 82nd Avenue has a Chinese speaking limited English proficiency population greater than 5 percent. Interestingly, there is also an area in downtown Portland where the Chinese speaking limited English proficiency population is greater than 5 percent. This may be to the number of international students or faculty attending or associated with a higher education campus located in downtown Portland such as Portland State University or Oregon Health Sciences University.

Additionally, while written translations would be accessible to Chinese readers, Chinese spoken dialects are not homogeneous, and the American Community Survey does not distinguish the dialects in its data. Determining the correct dialect(s) for oral translation would need additional information from the Chinese community and local jurisdiction community outreach staff. This is also true when considering that the population of the corridor of those who speak Chinese at home and speak English less than “very well” is greater than 1,000 persons.

Figure 15, Chinese language spoken at home and with 5 percent or greater limited English proficiency.



Potential impacts to Title VI and environmental justice populations

Specific impacts to the groups discussed above are unknown at this stage in the planning process as the Powell-Division Transit and Development Project alternatives have not been narrowed to a level conducive for identification of potential transportation or land use outcomes. Moving forward as alternatives are identified and narrowed, potential impacts to Title VI and environmental justice groups will be taken into serious consideration and will be reflected comprehensively in the environmental review process for this project.