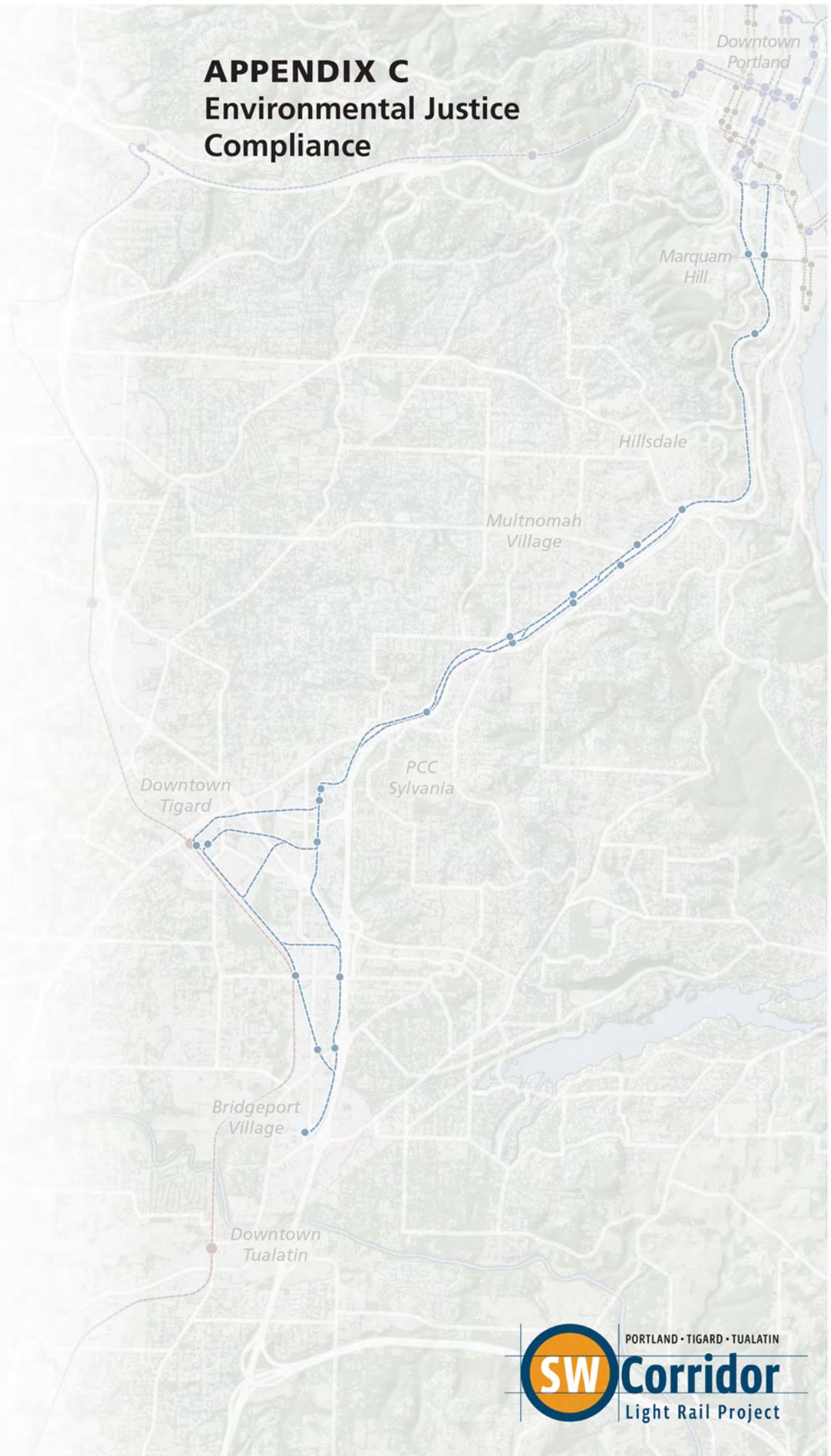


APPENDIX C Environmental Justice Compliance



APPENDIX C – ENVIRONMENTAL JUSTICE COMPLIANCE

This appendix describes the analysis and public outreach conducted to identify potential environmental justice issues related to the construction and operation of the Southwest Corridor Light Rail Project. Environmental justice has been addressed as required by Presidential Executive Order 12898, Federal Actions to Address Environmental Justice to Minority Populations and Low-Income Populations (February 11, 1994); the U.S. Department of Transportation (USDOT) Order 5610.2, Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (April 15, 1997); and the USDOT Order 5610.2(a) (May 2, 2012) updating the USDOT policy to consider environmental justice principles in all programs, policies and activities. The environmental policies of the USDOT agencies, including the Federal Transit Administration (FTA), are summarized below. The agencies are to:

1. Avoid, minimize and mitigate disproportionately high and adverse effects on minority and low-income populations.
2. Ensure full and fair opportunities for public involvement by members of minority and low-income populations during the planning and development of a proposal involving federal action (including the identification of potential effects, alternatives and mitigation measures).
3. Prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

FTA environmental justice policy guidance (FTA Circular C 4703.1) defines a disproportionately high and adverse effect as one that:

- Is predominantly borne by a minority or low-income population, or
- Will be suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority population and/or non-low-income population.

The USDOT Order also provides guidance that “[i]n making determinations regarding disproportionately high and adverse effects on minority and low-income populations, mitigation and enhancement measures that will be implemented and all offsetting benefits to affected minority and low-income populations may be taken into account, as well as the design, comparative impacts, and the relevant number of similar existing system elements in non-minority and non-low-income areas” (USDOT 5610.2(a) Section 8(b)).

Defining Environmental Justice Populations

Under USDOT Order 5610.2(a), a minority person includes persons who meet the following criteria:

- Black or African American: A person having origins in any of the black racial groups of Africa.
- Hispanic or Latino: A person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race.
- Asian American: A person having origins in any of the original peoples of the Far East, Southeast Asia and the Indian subcontinent.

- American Indian/Alaskan Native: A person having origins in any of the original people of North and South America (including Central America) and who maintains tribal affiliation or community attachment.
- Native Hawaiian or Other Pacific Islander: A person having origins in any of the original peoples of Hawaii, Guam, Samoa or other Pacific Islands.
- Some Other Race: Includes all other responses not included in the White, Black or African American, American Indian/Alaskan Native, Asian American, and Native Hawaiian or Other Pacific Islander race categories described above. Respondents reporting entries such as multiracial, mixed, interracial, or a Hispanic or Latino group (for example, Mexican, Puerto Rican, Cuban or Spanish) in response to the race question are included in this category.

At a minimum, low-income is defined by FTA as a person whose annual household income is at or below the U.S. Department of Health and Human Services poverty guidelines of \$24,257 (2015 threshold) for a family of four. While the federal threshold was used to compare the percentage of low-income persons on a regional and local basis, the Southwest Corridor Light Rail Project also considered the 2014 regionally adopted definition of low-income, which is 200 percent of the federal poverty level. Adjusted for household size and reflecting the high cost of housing in Portland and surrounding areas, the regional threshold was about \$48,000 annually in 2014 for a family of four.

Regulatory Framework

The analysis of potential impacts on minority and low-income populations was prepared considering the federal and regional government regulations, policy and guidance listed below:

Federal

- Title VI of the Civil Rights Act of 1964
- Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended
- Presidential Executive Order 12898 – Federal Actions to Address Environmental Justice to Minority Populations and Low-Income Populations
- Presidential Executive Order 13166 – Improving Access to Services for Persons with Limited English Proficiency
- U.S. Department of Transportation Order 5610.2 – Order to Address Environmental Justice in Minority Populations and Low-Income Populations
- Title 42 United States Code (USC) Section 4601, Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended
- Title 49 of the Code of Federal Regulations (CFR) Part 21, Nondiscrimination in Federally Assisted Programs of the Department of Transportation, Effectuation of Title VI of the Civil Rights Act of 1964

- USDOT FTA, Circular FTA C 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients (October 1, 2012)
- USDOT FTA, Final Circular FTA C 4703.1, Environmental Justice Policy Guidance for FTA Recipients (August 15, 2012)
- Community Impact Assessment: A Quick Reference for Transportation, Publication No. FHWA-PD-96-036 (September 1996)

Regional

The Metro Council adopted Ordinance 00-882C, Affordable Housing Policy, on January 18, 2001, amending the Regional Framework Plan and the Urban Growth Management Functional Plan to encourage a choice of housing types and to help reduce regulatory barriers to affordable housing.

Study Area and Data Sources

The study area for the environmental justice analysis is generally defined as the area 0.5 mile from the construction footprint. The 0.5-mile distance that defines the study area includes neighborhoods within which residents and employees could access the proposed light rail stations or experience impacts. The overall functions, facilities and characteristics of the neighborhoods along the light rail alternatives were considered, even though many have boundaries that extend beyond 0.5 mile from the alternatives.

To characterize the affected environment and consider impacts, Metro followed the methodology defined in the *Southwest Corridor Methods Reports* (Metro, 2018) and used the information developed as part of the Environmental Impact Statement (EIS) across all environmental topics. Metro also considered reports and documentation from local, state and federal agencies and Geographic Information Systems (GIS). The following is a list of the key data sources used in the analysis:

- U.S. Census Bureau 2010 decennial census data on racial and ethnic minority populations, household types and age, as well as basic information about housing in adjacent neighborhoods and within 0.5 mile of the light rail alternatives
- U.S. Census Bureau 2006–2010 American Community Survey data on languages spoken at home, limited English proficiency, country of origin of persons born outside of the United States, transit-dependency, and low-income populations for adjacent neighborhoods and populations within 0.5 mile of the light rail alternatives
- U.S. Census Bureau 2010–2014 American Community Survey data on income levels, including persons at or below U.S. poverty thresholds within 0.5 miles of the light rail alternatives
- local service organizations, to supplement demographic information with client demographics
- information from prior public and environmental-justice-specific outreach to help verify findings, supplemented by ongoing public outreach for the EIS

- information about existing and planned low-income housing projects that are within the study area based on records of public housing authorities (Home Forward, Multnomah Housing Authority, Washington County Housing Services and others)
- information about other baseline environmental conditions for transportation, land use, economics, noise and vibration, air quality and greenhouse gases, visual quality, public services, safety and security, and parks and recreational resources

Environmental Justice Populations

Based on the U.S. Census Bureau data, minority or low-income populations were identified within 0.5-mile buffer areas or within census geographies. GIS was used to identify and map 2010 U.S. Census data for all census blocks that are entirely or partially in the study area. A census block is the smallest geographic unit used by the U.S. Census Bureau to collect data; therefore, the following analysis has utilized block data, because it provides a finer level of detail than census tract data and allows a better match of localized demographics to areas where impacts would be occurring. It also allows better comparisons of where meaningfully higher proportions of low-income or minority populations are present in the study area, compared to the Portland Metropolitan Statistical Area (regional) rate of low-income residents (32 percent) and minorities (27 percent).

Minority Populations

Minority populations within the study area are predominantly Hispanic or Latino, African American, American Indian/Native Alaskan and Native Hawaiian/Pacific Islander. The percentage of minority populations in the study area are below the region's 27 percent average rate of minority populations, but there are census tracts along Interstate 5 (I-5) and Highway 217 that have higher percentages than the regional average. Figures C-1 and C-2 and Table C-1 identify the populations of minorities within census tracts in the study area. Areas with similar or greater percentages of minority residents or specific minority groups compared to the regional average are:

- near downtown Portland
- west of SW Barbur Boulevard in the Hillsdale and Homestead neighborhoods
- along I-5 and SW Barbur Boulevard: west Portland along I-5 (West Portland Park, Far Southwest, Ashcreek, Crestwood, Multnomah and Markham neighborhoods)
- Tigard, specifically to the north of the Tigard Triangle along Highway 217 and Pacific Highway
- near SW Hall Boulevard in Durham

Table C-1. Minority Population by U.S. Census Tract

Tract Map ID	Census Tract	Total Population	Minority Population	Disaggregated Minority Populations											
				Black/African American		Hispanic/Latino		Asian American		American Indian/Native Alaskan		Native Hawaiian/Pacific Islander		Other/two or more	
A	41051005500	2,473	619 25.0%	97 3.9%	142 5.7%	223 9.0%	30 1.2%	11 0.4%	174 7.0%						
B	41051005600	5,097	1,380 27.1%	121 2.4%	281 5.5%	722 14.2%	48 0.9%	22 0.4%	309 6.1%						
C	41051005700	3,430	772 22.5%	66 1.9%	153 4.5%	382 11.1%	18 0.5%	6 0.2%	217 6.3%						
D	41051005800	4,847	772 15.9%	45 0.9%	157 3.2%	413 8.5%	14 0.3%	7 0.1%	195 4.0%						
E	41051006001	1,390	182 13.1%	13 0.9%	43 3.1%	65 4.7%	7 0.5%	8 0.6%	59 4.2%						
F	41051005900	5,800	996 17.2%	92 1.6%	290 5.0%	383 6.6%	36 0.6%	10 0.2%	306 5.3%						
G	41051006002	2,118	240 11.3%	20 0.9%	76 3.6%	85 4.0%	6 0.3%	2 0.1%	71 3.4%						
H	41051006200	2,848	319 11.2%	34 1.2%	106 3.7%	70 2.5%	16 0.6%	13 0.5%	121 4.2%						
I	41051006300	4,996	710 14.2%	51 1.0%	211 4.2%	234 4.7%	19 0.4%	2 0.0%	265 5.3%						
J	41051006602	4,821	875 18.1%	148 3.1%	298 6.2%	160 3.3%	26 0.5%	25 0.5%	313 6.5%						
K	41051006502	4,086	681 16.7%	98 2.4%	253 6.2%	130 3.2%	29 0.7%	28 0.7%	235 5.8%						
L	41051006402	5,609	644 11.5%	49 0.9%	156 2.8%	233 4.2%	23 0.4%	3 0.1%	242 4.3%						
M	41051006501	5,898	948 16.1%	170 2.9%	300 5.1%	229 3.9%	28 0.5%	16 0.3%	362 6.1%						
N	41051006403	3,915	1,069 27.3%	310 7.9%	281 7.2%	256 6.5%	34 0.9%	32 0.8%	291 7.4%						
O	41051006404	3,674	592 16.1%	69 1.9%	172 4.7%	196 5.3%	17 0.5%	9 0.2%	186 5.1%						
P	41067030600	5,236	982 18.8%	76 1.5%	442 8.4%	217 4.1%	36 0.7%	50 1.0%	393 7.5%						
Q	41067030700	1,435	524 36.5%	31 2.2%	336 23.4%	80 5.6%	24 1.7%	23 1.6%	181 12.6%						
R	41005020304	5,438	1,112 20.4%	53 1.0%	211 3.9%	665 12.2%	17 0.3%	8 0.1%	219 4.0%						
S	41067030900	5,261	2,259 42.9%	196 3.7%	1,523 28.9%	191 3.6%	44 0.8%	164 3.1%	1,051 20.0%						
T	41067031912	4,446	1,204 27.1%	41 0.9%	764 17.2%	223 5.0%	39 0.9%	16 0.4%	611 13.7%						
U	41067030801	6,774	1,938 28.6%	108 1.6%	1,240 18.3%	269 4.0%	52 0.8%	90 1.3%	760 11.2%						
V	41067030806	2,604	781 30.0%	47 1.8%	420 16.1%	178 6.8%	10 0.4%	37 1.4%	354 13.6%						
W	41005020302	3,591	613 17.1%	34 0.9%	200 5.6%	240 6.7%	19 0.5%	4 0.1%	189 5.3%						
X	41067032001	5,445	1,200 22.0%	79 1.5%	702 12.9%	170 3.1%	24 0.4%	44 0.8%	583 10.7%						
Y	41067032005	4,169	2,069 49.6%	83 2.0%	1,682 40.3%	78 1.9%	37 0.9%	111 2.7%	1,238 29.7%						
Z	41005020401	5,059	656 13.0%	20 0.4%	252 5.0%	202 4.0%	25 0.5%	5 0.1%	216 4.3%						
Regional percentage			26.9%	3.5%	12.0%	7.0%	0.9%	0.5%	9.8%						

Source: U.S. Census (2010)

Note: Percentages in bold with dark shading are more than two times the regional percentage for that population. Percentages with light shading are one to two times the regional percentage for that population. Disaggregated minority population values do not add up to the total minority population because individuals may fall into multiple disaggregated populations.

Low-Income Populations

A low-income household is defined as a household with an income that is equal to or less than 200 percent of the Federal Poverty Level (\$24,257 in 2015 for a family of four). The average regional percentage of low-income households is 31.1 percent. There are few concentrations of low-income populations within the study area. Figures C-3 and C-4 and Table C-2 identify the presence of low-income populations in census tracts in the study area. Areas with higher percentages of low-income populations than the regional average are:

- south of downtown Portland, between I-5 and SW Barbur Boulevard
- south of the Hillsdale neighborhood adjacent to SW Terwilliger Boulevard
- south of West Portland along I-5, northwest of I-5 around SW Capitol Hill Parkway
- within the Tigard Triangle, and in Tigard north of the Tigard Triangle between Highway 217 and Pacific Highway

Table C-2. Low-Income Population by U.S. Census Tract

Tract Map ID	Census Tract	Total Population	Low-Income Population	
A	41051005500	2,620	1,521	58%
B	41051005600	3,419	1,961	57%
C	41051005700	3,938	1,362	35%
D	41051005800	5,572	1,017	18%
E	41051006001	1,466	342	23%
F	41051005900	6,737	1,571	23%
G	41051006002	2,214	394	18%
H	41051006200	3,068	625	20%
I	41051006300	3,884	666	17%
J	41051006602	5,342	1,891	35%
K	41051006502	4,195	1,065	25%
L	41051006402	5,642	308	5%
M	41051006501	5,932	1,123	19%
N	41051006403	4,146	1,299	31%
O	41051006404	3,310	481	15%
P	41067030600	5,554	878	16%
Q	41067030700	1,439	755	52%
R	41005020304	5,954	890	15%
S	41067030900	4,685	2,395	51%
T	41067031912	4,557	915	20%
U	41067030801	6,924	1,881	27%
V	41067030806	2,552	706	28%
W	41005020302	3,559	549	15%
X	41067032001	5,415	2,007	37%
Y	41067032005	3,751	1,973	53%
Z	41005020401	4,780	1,276	27%
Regional percentage			32.0%	

Source: American Community Survey (2010-2014)

Note: Shaded percentages exceed the regional percentage.

Corridor Facilities Serving Minority and Low-Income Populations

Corridor facilities that could serve or employ minority and low-income people include businesses, religious facilities, parks, affordable housing, and community centers and gathering places. Examples of such businesses or institutions in the study area include:

- Industrial Supply Co: distribution company providing foundry supplies, equipment and industrial products; may provide low-income employment opportunities
- ASSIST non-profit organization: Social Security disability assistance program that helps the disabled population claim and receive Social Security benefits; many clients are homeless or live in poverty
- ethnic restaurants
- Goodwill Donation Center: donation center with no retail
- Groundspring Healing Center: provides adult and pediatric acupuncture, traditional Chinese medicine and other related services
- Wallace & Associates vocational rehabilitation: vocational rehabilitation firm providing services to insurance companies, attorneys, employers, injured workers and clients making career transitions; offers vocational counseling, work site assessment, vocational testing and career development
- Bonita Pioneer: package products company offering a full line of retail packaging supplies including wrapping paper, custom shopping, gift, and merchandise bags and boxes; may provide low-income employment opportunities
- Williams Control: provides electronic, hydraulic and pneumatic components for all types of commercial vehicles; may provide low-income employment opportunities
- Value Village: thrift store offering secondhand clothing, footwear, furniture, books and household items
- Maurice Lucas Foundation: provides a combination of education and activity-based after-school programs for middle school students; focused on providing a positive educational experience and skill building through sports training, skills building and games
- Portland Clinic Urgent Care: provides primary care and specialty services that may serve low-income and minority populations

Figure C-1
Minority Population
Percentage

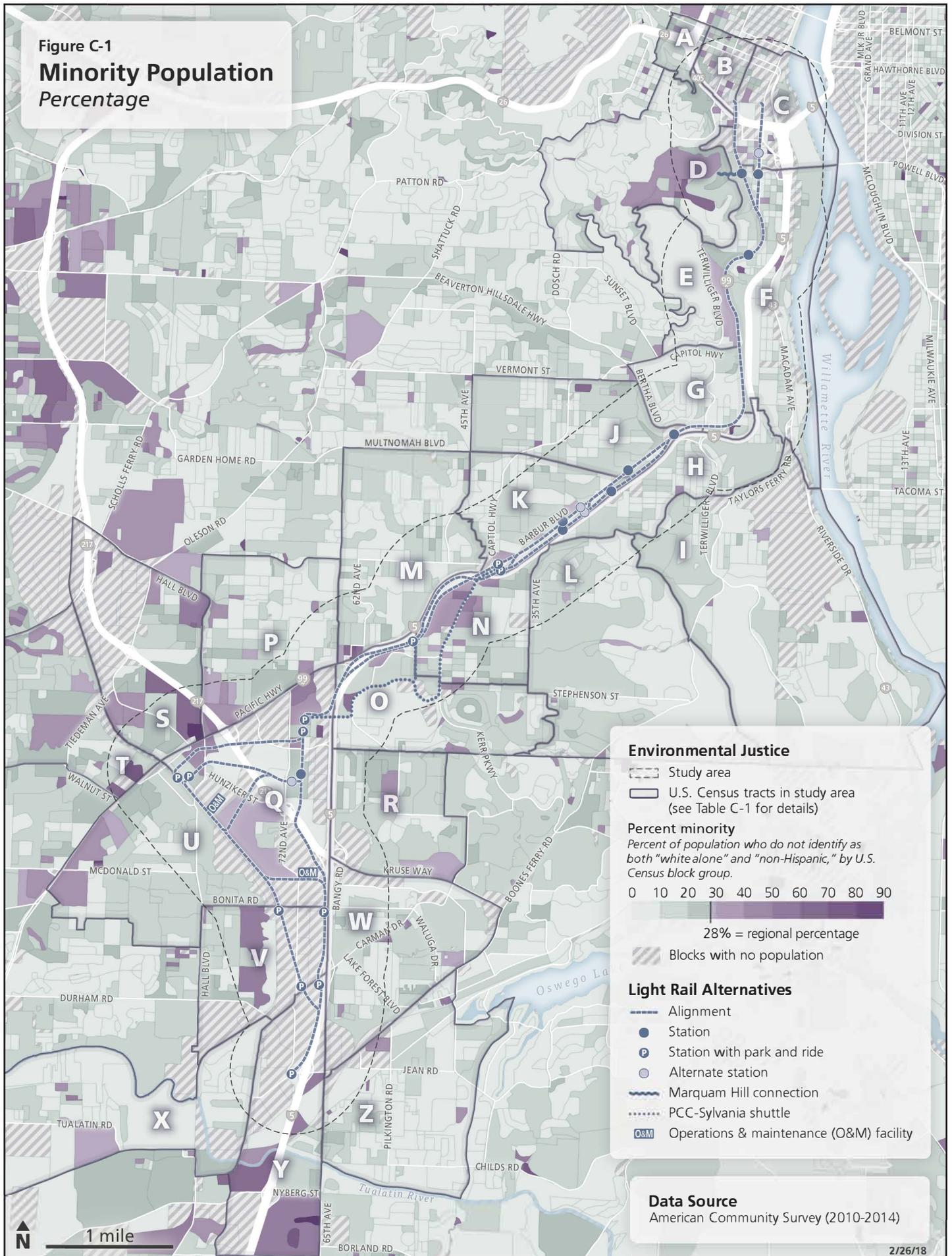
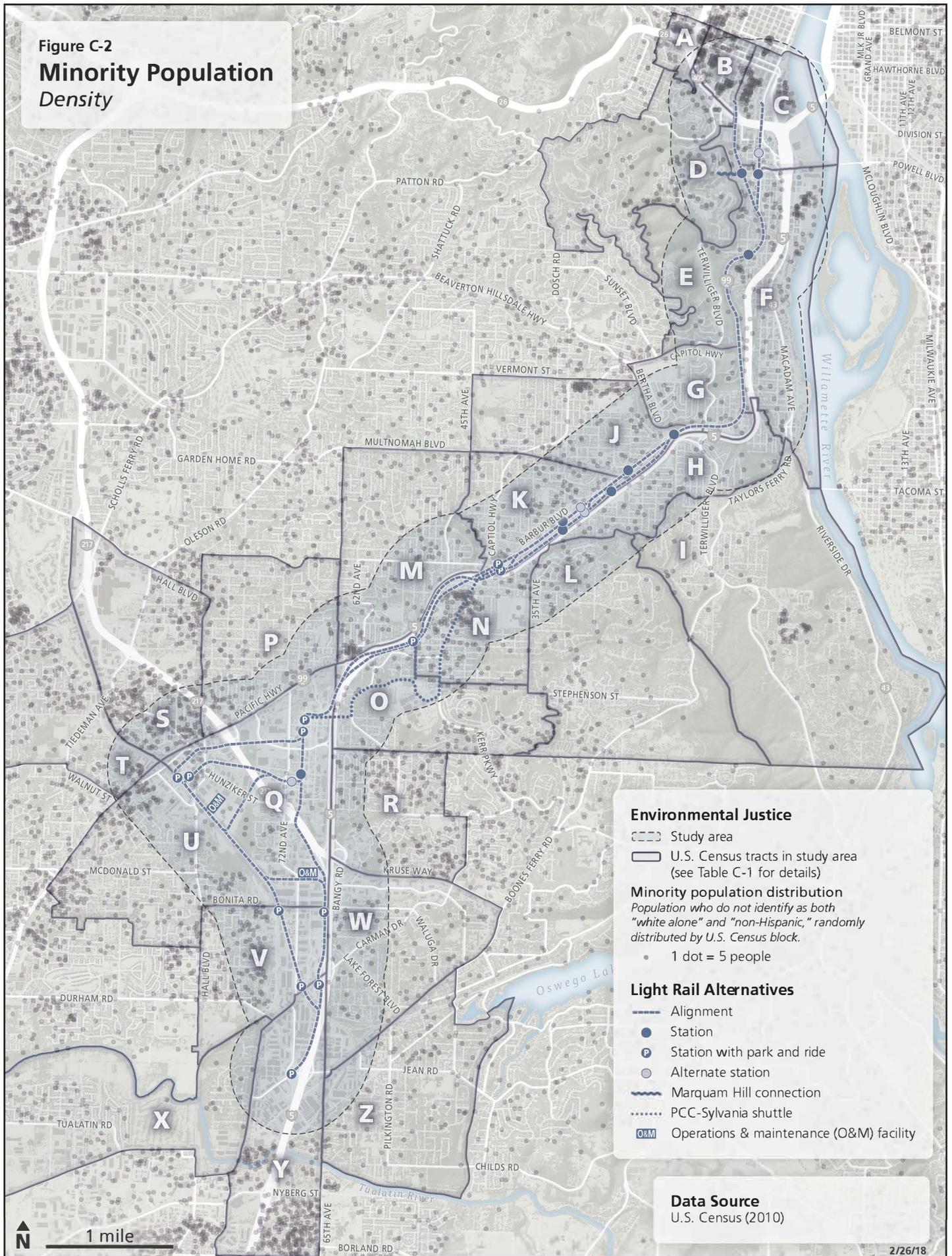


Figure C-2
Minority Population
Density



Environmental Justice

- Study area
- ▭ U.S. Census tracts in study area (see Table C-1 for details)

Minority population distribution
 Population who do not identify as both "white alone" and "non-Hispanic," randomly distributed by U.S. Census block.

• 1 dot = 5 people

Light Rail Alternatives

- Alignment
- Station
- P Station with park and ride
- A Alternate station
- ~ Marquam Hill connection
- ... PCC-Sylvania shuttle
- O&M Operations & maintenance (O&M) facility

Data Source

U.S. Census (2010)

Figure C-3
Low-Income Population
Percentage

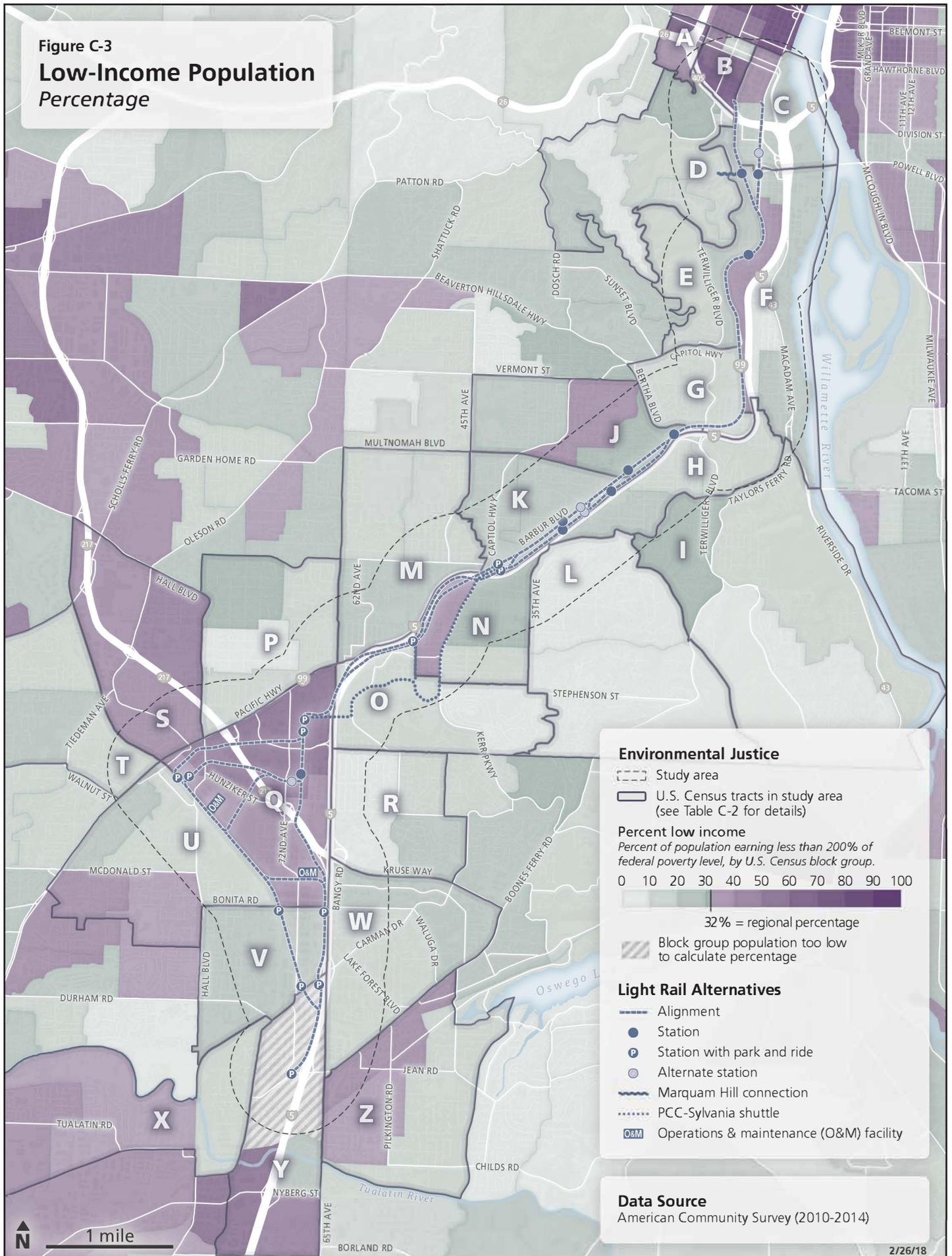
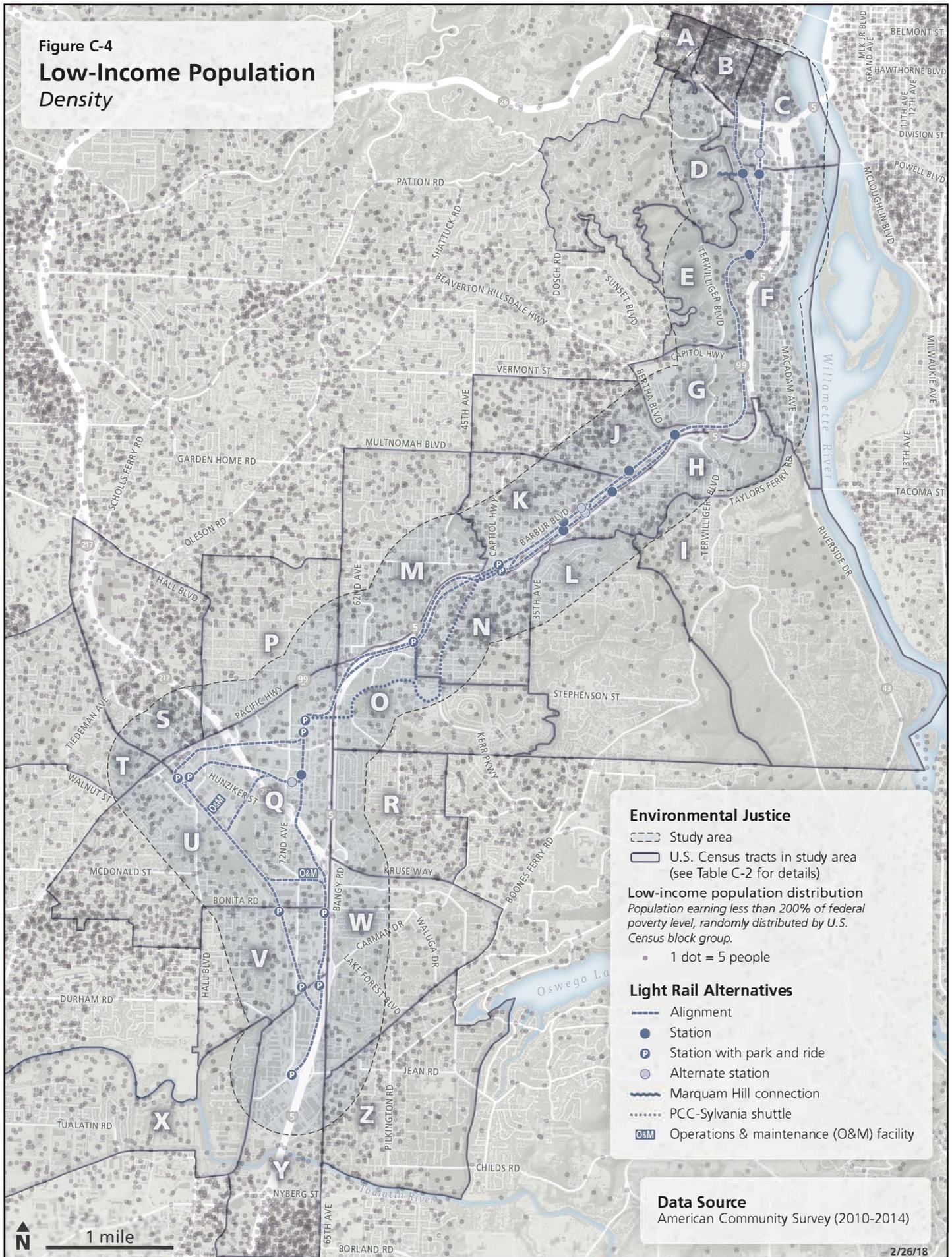


Figure C-4
Low-Income Population
Density



Environmental Justice Outreach

From the beginning of the overall Southwest Corridor planning program, and leading up to the identification of light rail as the preferred mode and the start of this Draft EIS, public involvement efforts have focused on engaging minority and low-income populations along with the general public. The following describes the major phases of the project's development.

Early Scoping: 2012–2013

During 2012 and 2013, public outreach focused on the challenges facing communities and desired outcomes, generating feedback on the need for high capacity transit (HCT) in this corridor, getting input on where a future HCT line could go and what local destinations could be served, and developing an initial list of multimodal projects that could be included as part of an HCT project.

All activities were developed to encourage participation from a diverse range of corridor residents, employees, employers and other stakeholders. Below is a summary of outreach efforts during this time:

- Seventeen discussion groups in early 2012 focused on equity and affordable housing. Two of these sessions targeted recruitment of participants working with lower-income populations and/or communities of color.
- A Title VI and environmental justice outreach plan was created in July 2012 to coincide with the development of the project's Title VI and Environmental Justice Analysis.
- The comments generated through these early conversations helped to shape ongoing strategies to reach the following groups:
 - low income: connect to established network of community leaders, and provide information and notices for multifamily housing, elementary schools and local event venues
 - Hispanic or Latino: connect to established network of community leaders, translate materials, use local Hispanic radio stations, and reach out to community resources such as schools and Hispanic Chamber of Commerce
 - Asian American: connect to established network of community leaders, translate materials, and provide information and notices through community resources such as schools and Asian Pacific American Chamber of Commerce
 - African American: connect to established network of community leaders, and use community resources such as schools and churches to reach people
 - American Indian/Alaskan Native: connect to established network of community leaders, and use community resources such as confederated tribes, social service organizations and elementary schools to share information and notices
 - Native Hawaiian and Pacific Islander: connect to established network of community leaders, and involve the Asian Pacific American Chamber of Commerce, elementary schools and community resources to share information and notices

- Translated notices informing the public about how to use the SW Interactive Map and Survey Tool were distributed in Spanish and Vietnamese, the two languages that project outreach and census information identified as having the highest need for translated materials. The tool helped survey the public about their alignment preferences. Metro staff attended community events targeted to minority and low- income populations, and had face-to-face meetings with leaders in the environmental justice and social service communities.
- In May and June 2013, Metro staff contacted 16 organizations working with environmental justice populations to request one-on-one meetings for obtaining input on the project and recommendations about future outreach and partner opportunities. Staff met in person with representatives from the Latino Network, Center for Intercultural Organizing, Community Housing Fund, Elders in Action, New Portlanders Program and Vision Action Network, and on the phone with the Center for Diversity in the Environment and OPAL (Organizing People/Activating Leaders) Environmental Justice.

Project Pre-Refinement: 2014

Staff conducted targeted outreach to the Spanish and Vietnamese communities through a Transit Fair at St. Anthony Church in Tigard, which has large numbers of Spanish and Vietnamese parishioners. The event included translated materials and on-site translators. Participants suggested stations that were close to important destinations, transit connections and existing housing; they also identified specific multimodal improvement projects.

Project Refinement: 2015–Fall 2016

Outreach during this period focused on place-based outreach specific to neighborhoods along the proposed alignment, and included providing outreach on potential underground transit tunnels being considered and determining preferences for bus rapid transit or light rail as the transit mode. Activities included seven online surveys; an online interactive map tool; four planning forums; convening of a project advisory group called ID Southwest; extensive participation at open houses and tabling and community events; and multiple group and individual outreach meetings with local civic, business, social services and neighborhood stakeholders.

Metro staff implemented targeted efforts during this period to reach low-income populations and communities of color:

- “Community Conversations” were conversations with groups and individuals held in order to understand perspectives on regional transportation needs and solutions, and to identify aspects of the transit planning process that were most relevant to the community’s needs and organizational missions. Community Conversations were held with Supa Fresh Youth Farm, Oregon Somali Family Education Center, Community Partners for Affordable Housing, Coalition for a Livable Future, Upstream Public Health, 1000 Friends of Oregon and Center for Intercultural Organizing.
- In spring 2016, Metro staff contracted with a local advocacy organization to co-create and conduct transit rider intercept surveys to connect with transit riders along existing local bus lines in the Southwest Corridor. The surveys were part of an ongoing effort to better engage existing transit riders in the outreach efforts, and generated input on current ridership habits, high-priority

destinations in the corridor, riders' perceptions of impacts and benefits of a potential future HCT line, and desired safety improvements at transit stops.

Draft EIS Scoping: Fall 2016

A formal scoping comment period for the Southwest Corridor Light Rail Project was held from September 2, 2016, to October 3, 2016.

Staff targeted specific scoping outreach to environmental justice communities by:

- publishing advertisements of the public comment opportunities in all local newspapers that included Spanish and Vietnamese translation
- purchasing advertisements in two monthly papers serving communities of color: *El Hispanic News* and *The Asian Reporter*
- sending targeted emails to organizations working with environmental justice communities.

A scoping survey had a section specific to racial and social equity which noted that different people in the community could be impacted differently by a light rail project. It also noted the environmental justice issues raised up to that date through project outreach, including increased or decreased access to important community services (employment, education, affordable housing, health care and retail services); changes in property values; increased or decreased exposure to environmental impacts; increase or decrease in safety and security; and increase or decrease in community stabilization or displacement. Survey responses reinforced these concerns, identifying concerns about racial and social equity, affordable housing, involuntary displacement, crime, noise pollution, homeless displacement and gentrification.

Outreach Throughout Entire Study Period

Outreach activities targeted to environmental justice communities and the general public were held within the Southwest Corridor at convenient sites located on local bus lines to facilitate the participation of a diversity of residents. To accommodate working schedules and families, most meetings were held on weekends or evenings, and provided food and children's activities.

Potential Environmental Justice Impacts

The following evaluation of potential environmental justice impacts considers the potential adverse impacts that have been identified by environmental area in the EIS, including the locations where they would occur, and then identifies those that may affect minority or low income populations. Table C-3 summarizes the potential for adverse project effects by environmental resource area, and describes impacts on minority and low-income populations. Proposed mitigation measures, as well as project improvements or benefits, are also noted and then evaluated for their potential to minimize or offset adverse effects on minority and low-income populations.

Table C-3. Summary of Impact to Environmental Justice Populations (multi-page table)

Environmental Resource	Impacts	Impacts on Minority and Low-income Population(s)	Potential Design Measures, Mitigation and Enhancement	Benefit(s) to Minority and Low-income Population(s)
<p>Transportation</p> <ul style="list-style-type: none"> • Streets • Transit • Bicycle and Pedestrian • Parking 	<ul style="list-style-type: none"> • In all segments, increased local street congestion and bicycle and pedestrian activity around transit stations, particularly with passenger drop-off/pick-up activity, nearby bus stops, and park and ride facilities • Local and arterial intersections affected (below acceptable level of service [LOS]) • Existing on-street and off-street parking removed • Spillover parking in neighborhoods near stations • Temporary construction impacts from reduced highway and local roadway capacity, truck traffic, loss of parking, road closures or detours • Construction period changes in bus routes or travel times, reduced capacity of transit park and rides • Changes to property access • Temporary closures of sidewalks, bike facilities and bus stops 	<p>Same as with general populations, although construction-period changes to transit stops and transit travel times may be more likely to affect minority or low-income people who depend on transit</p>	<ul style="list-style-type: none"> • Integrated improvements to streets, sidewalks, and bicycle facilities and trails, including mitigation for congestion impacts on local and arterial street intersections, would result in the same or better conditions as No-Build • Parking management strategies would be coordinated in station areas to minimize spillover parking in neighborhoods • Bicycle and pedestrian improvements would be implemented at transit stations to accommodate projected increase in bicycle and pedestrian travel 	<ul style="list-style-type: none"> • Benefits from improved transit levels of service, including better service between corridor neighborhoods and better connections to other centers providing jobs, education and public services, including in downtown Portland, Oregon Health and Sciences University and Veterans Affairs (VA) Portland Health Care System, PCC, PSU and Portland airport • Improved transit service reliability and transit travel times in the corridor, increased frequency throughout the day and extended service hours • Increased Americans with Disabilities Act-compliant transit, bicycle and pedestrian facilities, and access to stations and other transit facilities
<p>Residential acquisitions and displacements</p>	<ul style="list-style-type: none"> • Segment A <ul style="list-style-type: none"> ○ A1 fully acquires 8 residential properties (6 single-family residential [SFR], 2 multifamily residential [MFR]), displaces 41 residential units ○ A2-BH fully acquires 11 residential properties (9 SFRs, 2 MFRs), displaces 53 residential units ○ A2-LA fully acquires 26 residential properties 	<ul style="list-style-type: none"> • Properties to be acquired in all segments are in areas where low-income and/or minority populations are present, and some individuals from these populations are likely to be affected the same as the general population • Alternatives A2-BH and A2-LA and all Segment B alignment alternatives remove multifamily apartment complexes in block 	<ul style="list-style-type: none"> • Property owners and displaced residents and businesses would receive compensation and relocation assistance consistent with federal and state regulations • Relocation policies require replacement housing to be affordable for the displaced resident • TriMet will identify replacement housing options that consider such factors as proximity to 	<p>TriMet relocation policies and federal and state requirements for safe, sanitary and affordable replacement housing can often result in replacement housing that exceeds the quality of existing housing. This occurs most often when families are presently in dwellings that do not meet the space requirements (separate bedrooms for children of opposite sex) or other safe, sanitary and affordability requirements. On</p>

Table C-3. Summary of Impact to Environmental Justice Populations (multi-page table)

Environmental Resource	Impacts	Impacts on Minority and Low- income Population(s)	Potential Design Measures, Mitigation and Enhancement	Benefit(s) to Minority and Low-income Population(s)
	<p>(20 SFRs, 6 MFRs), displaces 125 residential units.</p> <ul style="list-style-type: none"> • Segment B fully acquires 15 to 20 residential properties <ul style="list-style-type: none"> ○ B1/B2/B3 fully acquire 13 to 16 SFRs and the same 2 MFRs, displace 32 to 35 residential units ○ B4 fully acquires 18 SFRs and 2 MFRs, displaces 78 residential units (due to larger apartment complexes impacted) • Segment C fully acquires 5 to 13 residential properties <ul style="list-style-type: none"> ○ C1/C2/C5 fully acquire 10 SFRs and 3 MFRs, displace 85 residential units ○ C3/C4 fully acquire 5 SFRs and no MFRs, displace 5 residential units ○ C6 fully acquires 6 SFRs and no MFRs, displaces 7 residential units 	<p>groups where low-income and minority people are present</p> <ul style="list-style-type: none"> • Alternatives C1,C2 and C5 (SW Ash Ave. alignments) would displace several multifamily complexes in a block group where low-income and minority populations are present 	<p>commercial and community facilities, schools (if applicable), an individual’s place of employment and accessibility to transit if the residents are transit-dependent</p> <ul style="list-style-type: none"> • Tenants or rented property may be eligible for rent supplement if comparable decent, safe and sanitary replacement housing costs more than their current rental cost; in these cases, TriMet would pay the difference, or a portion of the difference, between the tenant’s current and new rental rates for up to 42 months 	<p>previous projects, total compensation and relocation support has enabled parties to purchase a replacement dwelling rather than continuing to rent, which helps avoid future displacements from rental properties due to market forces.</p>
Economics (Business Displacements)	<ul style="list-style-type: none"> • Segment A fully acquires 12 to 13 commercial properties and displaces 15 to 23 businesses <ul style="list-style-type: none"> ○ A1 displaces 15 businesses, 108 employees ○ A2-BH displaces 22 businesses, 371 employees ○ A2-LA displaces 23 businesses, 231 employees • Segment B <ul style="list-style-type: none"> ○ B1 fully acquires 58 commercial properties, displaces 54 businesses and 500 employees 	<ul style="list-style-type: none"> • Properties to be acquired are in areas where low-income and/or minority populations are present, and some individuals from these populations are likely to be affected the same as the general population • Based on the types of businesses displaced and the demographic characteristics of the corridor, some employees of displaced businesses could be minority and/or low-income persons • ASSIST is a business displaced by all alternatives in Segment A; this 	<ul style="list-style-type: none"> • As with residential displacements, there would be opportunities for businesses to relocate in the surrounding area; business owners affected by property acquisitions will be treated fairly and equitably, and TriMet will conduct outreach to those businesses, and work with businesses serving minority and low-income persons to locate within the areas they serve if possible • Other construction impact mitigation measures are detailed 	<ul style="list-style-type: none"> • Opportunities for redevelopment in station areas, particularly in downtown Tigard, could attract new businesses and jobs to neighborhoods near station areas • Improved access to employment centers and expanded employment opportunities for minority and low-income persons residing in the project corridor • Federal expenditures associated with construction could result in more than \$4.8 billion in direct expenditure and annual

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Environmental Resource	Impacts	Impacts on Minority and Low- income Population(s)	Potential Design Measures, Mitigation and Enhancement	Benefit(s) to Minority and Low-income Population(s)
	<ul style="list-style-type: none"> ○ B2 fully acquires 54 commercial properties, displaces 61 businesses and 469 employees ○ B3 fully acquires 44 commercial properties, displaces 66 businesses and 565 employees ○ B4 fully acquires 29 commercial properties, displaces 62 businesses and 496 employees ● Segment C <ul style="list-style-type: none"> ○ C1 fully acquires 23 commercial properties, displaces 40 businesses and 734 employees ○ C2 fully acquires 15 commercial properties, displaces 36 businesses and 323 employees ○ C3 fully acquires 20 commercial properties, displaces 27 businesses and 839 employees ○ C4 fully acquires 12 commercial properties, displaces 23 businesses and 428 employees ○ C5 fully acquires 24 commercial properties, displaces 54 businesses and 515 employees ○ C6 fully acquires 27 commercial properties, displaces 44 businesses and 545 employees ● Temporary construction impacts would increase traffic congestion 	<p>business serves homeless and disabled populations</p> <ul style="list-style-type: none"> ● Three ethnic restaurants would be displaced in Segment B – Japanese, Thai and Mexican ● Four displacements in Segment B appear to serve environmental justice communities: Goodwill donation center, Groundspring Healing Center (Chinese medicine) and Wallace & Associates vocational rehabilitation firm, Maurice Lucas Foundation (serves inner city middle school students) ● In Segment C along SW Main St., an area with 54% to 100% minority population (and low-income population), large retail stores will be displaced that might serve the low-income community, including Rite-Aid pharmacy and Value Village 	<p>in Section 3.3, Economics, but they include programs and outreach with businesses to develop a detailed mitigation plan and to coordinate with businesses during construction to minimize impacts that could disrupt business activities</p> <ul style="list-style-type: none"> ● Maintain access as much as possible to each business and coordinate with businesses during times of limited access during construction ● Provide business planning, marketing and other technical assistance to businesses or other entities that could be affected by construction-period impacts or by relocation ● Provide job or career counseling as well as placement support to employees who may be affected by the temporary closure, permanent closure or relocation of an employer 	<p>employment of more than 18,000 jobs in the region</p> <ul style="list-style-type: none"> ● Positive construction effects include a variety of skilled and lower-skilled construction jobs, as well as worker expenditures at nearby businesses

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Environmental Resource	Impacts	Impacts on Minority and Low- income Population(s)	Potential Design Measures, Mitigation and Enhancement	Benefit(s) to Minority and Low-income Population(s)
	and reroutes, noise, vibration, dust and visual obstruction that would affect nearby businesses			
Noise and Vibration	<ul style="list-style-type: none"> • There are noise- and vibration-sensitive land uses along the entire corridor including private residences and community facilities. • Without mitigation, noise impacts would occur; the affected sites are mostly in Segment A, with 161 to 353 moderate noise impacts and 1 to 8 severe, depending on Through vs. Branched Configuration; vibration impacts range from 31 to 76 • Without mitigation, Segment B moderate noise impacts range from 44 to 147, and zero to one severe impacts, depending on Through vs. Branched Configuration; vibration impacts range from 17 to 29 • Without mitigation, Segment C moderate noise impacts range from 12 to 72, and 3 to 15 severe impacts, depending on Through vs. Branched Configuration; vibration impacts range from 2 to 21 • Construction-related noise and vibration impacts would occur with any alignment alternative 	<ul style="list-style-type: none"> • Noise and vibration impacts occur in all segments where there are presence of minority and low-income populations; low-income and minority populations would experience noise and vibration impacts no more than the general population • Zero severe noise impacts to minority or low-income populations in Segment A; some moderate noise impacts south of SW Hamilton St. in an area with a low-income population • Zero severe and few moderate noise impacts to minority or low-income populations in Segment B • C1,C2 and C5 (SW Ash Ave. alignments) results in all severe noise impacts in the areas where there are low-income and minority populations; several moderate noise impacts in these same areas 	<ul style="list-style-type: none"> • Noise impacts can be mitigated with sound walls and track design or residential sound insulation, if noise walls or source mitigation measures are not feasible or effective; noise could also be mitigated by ongoing maintenance of the vehicles and system • Vibration mitigation will be evaluated during design of the preferred alternative and incorporated into the design where feasible and reasonable • Project construction noise would meet the local noise-control regulations, dependent on the location of the construction activity; any potential nighttime construction noise would be restricted to the levels authorized by applicable regulations or variances issued to the project • Measures to minimize short-term annoyance from construction vibration include use of alternative methods with less vibration, such as drilled shafts in place of driven piles or the use of static roller compactors rather than vibratory roller compactors 	Noise mitigation related to the project could reduce existing noise for low-income and minority populations
Visual Quality	<ul style="list-style-type: none"> • High visual impacts from removing prominent features or introducing new features in visually sensitive areas 	<ul style="list-style-type: none"> • In general, the visual impacts would be the same as those experienced by the general population 	<ul style="list-style-type: none"> • Aesthetic plans with detailed options for applying various impact minimization measures, including replacement 	None

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	<ul style="list-style-type: none"> In Segment A, there would be a high visual impact from vegetation removal near Lair Hill Park and along SW Barbur Blvd. New structures in Segment B would result in visual impacts at the station at SW 53rd Ave. and from Crossroads bridge In Segment C, there would be a new flyover changing residential neighborhood character on SW 70th Ave., between SW Baylor St. and SW Dartmouth St. 	<ul style="list-style-type: none"> In Segment C, the visual impacts to environmental justice communities would be north of the Tigard Triangle due to the extension of SW 70th Ave., and visual impacts of the elevated structure over SW Dartmouth St. 	<ul style="list-style-type: none"> landscaping, would be developed in consultation with affected jurisdictions and communities. Construction mitigation measures would include shielding light sources and designing construction screens or barriers to limit visibility of work areas 	
Land Use	<ul style="list-style-type: none"> No adverse impacts – light rail alternatives are consistent with planning goals 	No adverse impacts	None required	None
Air Quality and Greenhouse Gases	<ul style="list-style-type: none"> No operational impacts Temporary human health risks association with increased levels of pollutants during construction, particularly emissions from construction equipment and trucks, and fugitive dust and particulates associated with grading and excavation 	Same as those experienced by the general population	<ul style="list-style-type: none"> No mitigation is required or proposed for light rail operation Potential construction mitigation includes mitigation measures and best management practices to control particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), and emissions of carbon monoxide and nitrogen oxides 	Improved air quality in the longer term due to reduced criteria pollutants and mobile source air toxics compared with No-Build conditions
Communities	<ul style="list-style-type: none"> Few to minor effects on community facilities and services Displacements of clusters of residential and business structures could disrupt individual social ties, and indirectly cause property values to increase through redevelopment around stations, which may price out low-income populations No cohesion impacts, because alignment alternatives would not 	C1,C2 and C5 (SW Ash Ave. alignments) would displace residents in a cluster of multifamily residential buildings in the downtown Tigard neighborhood along SW Hall Blvd. and SW Ash Ave that is located in a U.S. Census block containing a high density of low-income populations.	<ul style="list-style-type: none"> TriMet, Metro, the City of Portland and the City of Tigard are coordinating to identify strategies to prevent the indirect economic displacement of residents who would be living near the light rail alignment Residential and business displacements would be relocated; businesses will have the opportunity to relocate in the surrounding area; business owners, home owners and residents affected by property 	<ul style="list-style-type: none"> Walking and biking access through the South Portland neighborhood would be maintained or improved The project would improve transit access to the high concentration of medical and educational facilities in the Homestead and South Portland neighborhoods C1, C2 and C5 (SW Ash Ave. alignments) would improve access across an existing barrier in the downtown Tigard

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	<p>create neighborhood barriers or otherwise divide communities</p> <ul style="list-style-type: none"> • Temporary construction impacts, including dust, light/glare, noise and traffic congestion • Alternatives C1, C2 and C5 (SW Ash Ave. alignments) would displace residents in a cluster of multifamily residential buildings in the downtown Tigard neighborhood along SW Hall Boulevard and SW Ash Avenue. The overall character of this portion of downtown Tigard would become more urban, with the addition of sidewalks, light rail, a reconfigured transit center and a multistory parking garage 		<p>acquisitions will be treated fairly and equitably; TriMet will conduct outreach to those businesses, and will work with businesses serving minority and low-income populations to relocate within the areas they serve</p> <ul style="list-style-type: none"> • Strategies could include banking land for future development of affordable housing; purchasing existing, naturally occurring affordable housing to preserve its affordability; and providing financial assistance to low-income residents 	<p>neighborhood by extending SW Ash Ave. across the freight and commuter rail tracks</p>
Ecosystems Resources	<ul style="list-style-type: none"> • Tree removal in Segment A within protected areas; very minor wetland impacts • Tree removal in Segment B within protected areas; very minor wetland impacts • Streams that intersect alternatives in Segment C would be impacted with potential downstream impacts to aquatic species; wetland impacts range from 0.4 acre to 1.6 acres • Low potential for adverse effects on vegetation, wildlife or fish habitat 	Same as experienced by the general population	<ul style="list-style-type: none"> • Project design measures would avoid and minimize impacts on environmentally sensitive resources and provide compensatory mitigation measures where adverse effects are unavoidable, for no net loss of ecosystem functions • Construction best management practices would minimize impacts such that no additional mitigation measures would be required 	None

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Water Resources	The project would result in temporary construction and long-term increased pollution-generating and non-pollution-generating impervious surfaces, changes in water quality and flow control facilities and, in Segment C, floodplain impacts	Same as experienced by the general population	<ul style="list-style-type: none"> • The project would be designed to comply with all federal, state and local regulations, which would prevent or minimize potential impacts to water resources • Construction-related impacts on water resources would be prevented or minimized by complying with the federal, state and local regulations, and by implementing construction-related best management practices 	Stormwater treatment facilities that improve water quality compared to the No-Build would benefit all populations
Energy	<ul style="list-style-type: none"> • The alignment alternatives would result in lower energy consumption regionally • No adverse energy construction impacts 	Same as experienced by the general population	None	None
Geology, Soils and Hydrogeology	<ul style="list-style-type: none"> • Low risks to people from steep slope and landslide hazard areas • Corridor located in seismically active region • Some safety risks from erosion, slope instability, seismic ground-shaking, vibration, settlement, temporary excavations and dewatering during construction 	Same as experienced by the general population	Geology and soils risks would be avoided or minimized with the use of engineering design standards and best management practices	None

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Hazardous Materials	<ul style="list-style-type: none"> • Segment B alignment alternatives require acquisition of all or parts of four parcels with higher risk for remaining hazardous materials • Segment C alignment alternatives require acquisition of all or part of two to five parcels with higher risk for remaining hazardous materials • Contamination might be encountered during construction • Human health risks associated with accidental release or spill of hazardous materials along the alignment during construction 	Same as the general population, based on potential for exposure	<ul style="list-style-type: none"> • Environmental due diligence for properties before acquisition, and where hazardous materials are present, management plans and actions would be implemented • Contractors would be required to develop plans to implement best management practices to ensure that management of hazardous materials during construction is consistent with state and federal regulations 	In some neighborhoods with minority and low-income populations, acquired parcels with hazardous materials could be cleaned up
Public Services	<ul style="list-style-type: none"> • There would be changes in access, and circulation for public service provider operations would be altered • Emergency responders would respond to new incidents on light rail facilities • Road closures and rerouting due to construction activities would cause delays and potential confusion for public service providers 	Same as experienced by the general population	<ul style="list-style-type: none"> • TriMet would coordinate with public service providers to support facility design considerations and the training needed for public services staff, particularly police, fire and emergency services, so that they can safely and effectively respond to emergencies involving light rail • The project would minimize construction impacts through coordination with police, fire and local emergency response services 	None

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Safety and Security	<ul style="list-style-type: none"> Some station locations in Segment C would be in higher crime areas, particularly in the Tigard Triangle Rerouting of traffic, pedestrians and bikes during construction might cause confusion and could increase the risk of incidents 	Same as experienced by the general population	<ul style="list-style-type: none"> All of the alignment alternatives would feature the same safety and security techniques and systems that are applied throughout the regional transit system, which includes MAX For all facilities, final design and operations planning will consider best Crime Prevention through Environmental Design (CPTED) practices, including modified siting or layout concepts; the use of lighting, communications, electronic and security/police surveillance; and controlled entry 	Introducing light rail facilities that are designed using CPTED principles could improve the visibility of existing public facilities and avoid creating blind or hidden areas
Utilities	<ul style="list-style-type: none"> No long-term impacts on utilities under any alignment alternative, although some utility facilities may be relocated during construction to ensure long-term access Short-term temporary construction impacts on utilities 	Same as experienced by the general population	<ul style="list-style-type: none"> Coordination with utilities during final design Design measures to minimize the effects of stray current Potholing and preconstruction surveys during final design Construction of temporary utility lines, if needed, to ensure continuous service or to minimize disruptions 	None
Historic and Archaeological Resources	<ul style="list-style-type: none"> Segment A has 5 to 15 full acquisitions (adverse effect) to potentially eligible historic properties Segment B has two to five full acquisitions (adverse effect) to potentially eligible historic properties Segment C has zero full acquisitions (adverse effect) to potentially eligible historic properties 	Same as experienced by the general population; the majority of historic property acquisitions are located in non-minority or higher-income areas	<ul style="list-style-type: none"> Move rather than dismantle historic buildings Provide assistance to restoration efforts Contribute to the preservation of cultural heritage in the affected community Develop and support interpretative exhibits at local museums or on-site kiosks that highlight information gained about cultural resources Develop online history articles 	None

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	<ul style="list-style-type: none"> All alignment alternatives potentially impact archaeological sites 		<ul style="list-style-type: none"> Develop Inadvertent Discovery Plan prior to ground-disturbing construction activities 	
Parks and Recreation Resources	<ul style="list-style-type: none"> Duniway Park - Small tree and shrub removal along east side, reducing vegetation buffer between street and track. Lair Hill Park - Mature tree and shrub removal and retaining wall reconstruction along west side, reducing vegetation buffer from street and metal art sculpture; construction impact to edge of tennis backboard court and paved path Water and Gibbs Community Garden - Vegetation removal, permanent impact to garden area; garden is on City of Portland right of way Front and Curry Community Garden - Vegetation removal nearby and portion of garden outside of parcel boundary would be impacted Terwilliger Parkway/Open Space along SW Barbur Blvd. - Mature tree and shrub removal at base of slope, vegetation removal on steep slope and temporary detour or closure of a short portion of multiuse trail adjacent to SW Terwilliger Blvd. for Marquam Hill connection George Himes Natural Area Park - Mature tree and shrub removal below bridge and temporary closure of SW Trail #3 under bridge 	<ul style="list-style-type: none"> Low-income residents near the Fulton Park complex may rely on the community gardens for food Other impacts are the same as would be experienced by the general population 	<ul style="list-style-type: none"> TriMet and Metro are coordinating with Portland Parks and Recreation and the City of Tigard for project features and appropriate mitigation measures to reduce impacts to the parks and recreation properties TriMet would work with the park owner to determine appropriate compensation or other agreements needed to allow use of the land for the project Removal of mature trees and shrubs would be quantified at the time the development permit is reviewed, and appropriate mitigation would be provided For temporary trail and partial park closures during construction, TriMet would coordinate with appropriate local jurisdictions to develop detours or alternate access Construction duration around park facilities would be minimized to the extent possible, and the park facilities would be restored to the same condition as, or better condition than, before the light rail project started 	<ul style="list-style-type: none"> Several of the parks would receive walking and biking improvements as part of the project that would benefit minority and low-income populations to the same degree as the general population The project would improve access to parks to all users by providing an alternative mode of transportation

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	<ul style="list-style-type: none"> Fulton Park complex - Mature tree removal along SW Barbur Blvd., removing vegetation buffer between the Community Garden and the street and the Compost Demonstration Garden and the street; impact would remove up to four garden plots 			

1 Note: MAX = Metropolitan Area Express; MFR = multifamily residential; PCC = Portland Community College; PM₁₀ = particulate matter less than 10 micrometers in diameter; PM_{2.5} = particulate matter less
 2 than 2.5 micrometers in diameter; PSU = Portland State University; SFR = single-family residential.

Preliminary Conclusion

FTA and TriMet conducted a preliminary assessment on the potential for the Southwest Corridor Light Rail Project to have disproportionately high and adverse effects on minority and low-income populations, in accordance with Executive Order 12898 and USDOT Order 5610.2.

Based on the findings of impacts described in this appendix of the Draft EIS and considering the mitigation measures identified, there are differences among the alternatives in the levels of impacts potentially affecting minority or low-income populations. The majority of these impacts are related to the acquisition of properties and the relocation of existing uses or tenants, including homes, businesses or institutions. While there are mitigation measures that include fair compensation and relocation assistance that would reduce relocation and related economic impacts to levels that would not be high and adverse, the parties that are affected could still experience personal hardships due to the change of where they live or work. In some cases, there may also be personal or community associations that would be impacted when several blocks of a neighborhood are affected. If the preferred alternative is comprised of alignment alternatives that avoid higher levels of concentrated relocations compared to others, these types of effects would be less, even if they do not rise to a level that would be high and adverse. For example, in Segment A, Alternative A1 avoids the acquisition of several multifamily apartments affected by the alignments along SW Naito Parkway (Alternatives A2-BH and A2-LA). Segment B alignment alternatives all share similar impacts for acquisition of multifamily apartments, but further design measures could help reduce the need for displacements. In Segment C, Alternatives C1, C2 and C5 displace several apartment complexes, which other alternatives avoid.

Where residential relocations are unavoidable, they would be mitigated to levels that would be below high and adverse through TriMet's real property acquisition policy, including its compensation and relocation assistance program. TriMet's experience on other light rail projects has shown that low-income and minority populations receive additional long-term benefits through the relocation policies and federal and state requirements for safe, sanitary and affordable replacement housing. For these parties, the replacement housing often exceeds the quality of their existing housing. This occurs most often when families are presently in dwellings that do not meet space requirements (for example, separate bedrooms for children of opposite sex) or other safe, sanitary and affordability requirements. On previous projects, total compensation and relocation support has enabled parties to purchase a replacement dwelling rather than continuing to rent, which helps avoid future displacements from rental properties due to market forces. In addition, TriMet's relocation specialists work closely with affected parties to help them determine the most appropriate place to relocate, based on factors such as schools, services, employment or other community factors.

All of the alignment alternatives would require the acquisition of commercial properties and the relocation of businesses, which could affect their employees. While property owners and businesses would receive compensation and relocation assistance, there is the potential that some businesses could take the compensation and close, or they could relocate to other areas, eliminating some jobs. Depending on the types of businesses and the jobs involved, some of the affected employees may be low-income or minority individuals, and the loss of a job or the interruption of wages could be a hardship. Additional planning and technical or advisory support to both affected employers and their employees could help reduce the potential for these kinds of impacts, and job placement services could also help offset the impact of eliminated jobs. While such outreach and support would be available to all affected parties, it can be tailored to encourage the participation of low-income and minority individuals, helping to reduce impacts.

With the identification of the preferred alternative and the preparation of the Final EIS, further design measures, best management practices and mitigation would be defined to reduce the severity of individual or cumulative impacts on all populations, including minority and low-income populations, helping avoid the potential for high and adverse impacts to remain for any group.

Finally, the project, under all of the alignment alternatives, has offsetting benefits to all populations, but particularly for those that would be able to take advantage of the mobility benefits and infrastructure investments to be made by the project. Minority and low-income populations reside all along the corridor, and they tend to be most concentrated in the areas directly adjacent to the project alignments, compared to the mostly single-family neighborhoods in surrounding areas. They would be closest to stations and the higher frequency and extended service hours offered by light rail, compared to bus service with the No-Build Alternative. They would also benefit from the improved lighting, landscaping and controlled intersection improvements the project would offer. These mobility benefits translate into improved access to regional activity centers, including increased access to education, public service and employment providers. These improvements would particularly benefit transit-dependent persons, and this group statistically correlates more to minority and low-income populations than the general population. Transit-dependent persons includes people having more than one job, or working swing and graveyard shifts, which is more common with lower wage workers. The light rail system would have longer operating hours and more frequent service than the bus transit system, which would benefit them the most. Other offsetting benefits include reduced pollutants and mobile source air toxins compared to the No-Build Alternative. Ambient noise levels would also be reduced in locations with multifamily residences along the corridor, particularly where no noise barriers currently exist.

Based on the reasons discussed above and the ability for the project to further define mitigation and avoidance measures to minimize impacts to affected parties, FTA has preliminarily concluded that TriMet's Southwest Corridor Light Rail Project would not result in disproportionately high and adverse effects on minority and low-income populations.

Next Steps

FTA, Metro and TriMet will continue public outreach, including to minority and low-income populations, during the Draft EIS comment period, during the identification of the locally preferred alternative, and as the project continues to prepare a Final EIS and move into implementation. In the Final EIS and the federal Record of Decision for the project, FTA will make the final environmental justice determination for the project.

Throughout the development of the Final EIS, additional information about minority and low-income populations and potential measures to avoid, minimize and mitigate impacts will continue to inform project decision-making. Specific areas to target are listed below:

- research the multifamily residential displacements in downtown Tigard to better understand the affected community, its interactions, housing affordability, relocation opportunities and potential mitigation opportunities for replacing reduced housing supply through joint development with the cities of Tigard and Portland
- research the impact to minority or low-income populations from business displacements and further define mitigation measures to help minimize employment impacts
- research impacts to businesses that may serve or employ low-income or minority populations.

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