



Transportation Division

Title VI Annual Accomplishments Report

July 1, 2021 - June 30, 2022

Introduction

As a recipient of federal funding and an Oregon Department of Transportation (ODOT) certified local agency, Multnomah County Transportation Division complies with federal nondiscrimination laws and regulations, including Title VI of the Civil Rights Act of 1964. Title VI and related authorities ensure that no person based on race, color, national origin, sex, age, disability, limited English proficiency, or low income be excluded from participation in, be denied the benefits of, or otherwise be subjected to discrimination under any of our Transportation Division's programs or activities.

The Transportation Division maintains and implements a Title VI Program Plan to guide our compliance. This Annual Accomplishment Report summarizes our implementation activities during Fiscal Year (FY) 2022 from July 1, 2021 through June 30, 2022.

Complaints

No Title VI complaints against the Transportation Division were received during the FY2022 reporting period. There were two race discrimination complaints against other departments at Multnomah County that were related to access to specific programs. These complaints were resolved at the lowest level by those programs.

Activities and Accomplishments

Public Engagement

Federally-funded Capital Projects

238th Drive

The County sent a construction update [mailing](#) in August 2021 in English and Spanish.

Locally-funded Capital Projects

Earthquake Ready Burnside Bridge

Extensive community engagement was conducted in 2019-2020 to identify a preferred alternative. In 2021, County leaders asked the project team to analyze ways to reduce the cost of the project, so the project is more likely to be funded and built. Throughout the summer and winter of 2021, additional stakeholder input was sought on refinements to the preferred alternative. The primary engagement activities included an online open house and survey, a project webinar, discussion group meetings with members of communities identified in the project's Diversity, Equity, and Inclusion Plan, and numerous virtual briefings with community organizations, agencies, and neighborhood stakeholders. The online open house was offered in

6 languages and results for those who took the survey in languages other than English were similar to the overall results and did not have significant variations.

Multnomah County partnered with the Community Engagement Liaisons (CELs) Program to continue building relationships and engaging with currently and historically underserved and underrepresented communities. The liaisons' efforts engaged the Black and African American, Native American, Vietnamese, Chinese, Latinx, Japanese, Arabic, and Russian and Ukrainian communities. These communities were identified in the project's 2019 Diversity, Equity, and Inclusion (DEI) Plan based on frequently spoken languages within a one-mile radius of the project area and/or because of historical and cultural roots in the project area. A detailed summary of the input received from these discussion groups is included in the [Engagement Summary Report](#) from January 2022.

The project team published a Supplemental Draft EIS on April 29, 2022 documenting the changes to the original Preferred Long-Span Alternative from the Draft EIS. The public was invited to review and comment on the analysis during the 45-day comment period, from April 29 through June 13, 2022.

Latourell Bridge

A mailing was sent to residents in the project area in February 2022 to provide an update on the construction phase of the project. A notice in Spanish was included on the mailing for how to obtain more information in Spanish.

Reeder Road Culvert

A video PSA was produced in May 2022 to provide information to a broad audience on traffic delays to a popular recreation area due to emergency work to replace a collapsed culvert. The video was available on YouTube and included closed captions which could be auto-translated as well.

Planning and Development Program

Transit Program

During FY2022, outreach and final planning for a new job-connector shuttle in the industrial area south of the Portland International Airport was completed. The new free shuttle, branded as ACCESS: Alderwood-Cornfoot-Columbia Employment Shuttle Service, serves living-wage jobs and neighborhoods with high percentages of low-income households and communities of color. Forty-five percent of residents who live within 1/4 mile of ACCESS shuttle stops are non-White or of Hispanic/Latine origin.

The route and schedule of ACCESS was informed by feedback from a public survey as well as employer survey and interviews (see Data Analysis section for more details). The ACCESS shuttle was promoted during Sunday Parkways in the Cully neighborhood, communication with

community partners who work with underrepresented groups, a press release, and outreach at events in Parkrose neighborhood.

Safe Routes to School

A majority of the east county schools covered under our Safe Routes to School Program qualify for Free and Reduced Lunches and are considered low income with high percentages of families of color, immigrant, and refugee. Equity is woven into all of the work of this program. Here are some highlights from FY22:

- Provided bike helmets, locks, and translated bicycle safety information to Latine community in low-income housing in Gresham
- Wood Village Night Out and Fairview Night Out outreach events: provided translated pedestrian and bicycle safety information and activity sheets. Also included a flier (English and Spanish) on upcoming new crosswalks on Halsey St.
- 2021 Summer School Transportation Safety Lessons for underserved schools in east county. In partnership with bike works by p:ear, we taught 81 lessons at 17 schools to 1,143 people. (We count students and teachers)
- Provided activity packets (80) with pedestrian and bicycle safety information in multiple languages to the Centennial High School Food Pantry
- One school participated in the Ruby Bridges Walk to School Day event with an in-school coloring contest.
- Created parent driving videos in six languages that were distributed to the east county schools: <https://vimeo.com/showcase/9322965>. These videos have also been shared region-wide.
- Tabled at a “Wellness Wednesday” at the Rosewood Initiative (a non-profit that serves the diverse and low-income neighborhood). Provided translated pedestrian and bicycle safety information and activity sheets, in partnership with bike works by p:ear.
- Spring 2022 Transportation Safety Lessons - in school and afterschool lessons were provided. In partnership with bike works by p:ear, we taught at 4 school SUN programs and 4 different schools during their PE time. A total of 1,293 people.
- Hosted two community bike rides in East County with the City of Gresham and bike works by p:ear. One was in the diverse and low-income Rockwood community.

Bicycle and Pedestrian Community Advisory Committee (BPCAC)

The BPCAC has continued including land acknowledgements and equity topics at the beginning of their meetings to build an inclusive culture within the committee. Topics last year included: Honoring Black History Month, Black Music Month, Juneteenth recognition, and Native American Heritage Month. The committee also had a presentation on Equity and Work Culture in the Department of Community Services which the Transportation Division is a part of. Other activities included changing the committee’s name from Citizen Advisory Committee to Community Advisory Committee to be more inclusive of all members of our community, not specifically citizens. The Committee has also been focusing on safety issues and Vision Zero following up on presentations they heard the previous year from the County’s Health Department on the inequities in transportation safety, specifically for Black people in Multnomah County.

Water Quality Program

Our Water Quality Program includes broad public outreach with the goal of reducing pollution from our roads to streams. Through the collaborative partnership, Clean Rivers Coalition, which Multnomah County Transportation staff lead, we created a series of videos in partnership with the Columbia River Intertribal Fish Commission. The outreach is about sharing cultural values around water, centered on Native American values around our connection to water. The website, <https://followthewater.info>, and videos were launched in April 2022. The website features accessibility and language tools in addition to inclusive messages.

ADA Transition Plan

The Transportation Division's ADA Transition Plan was made available for public comment starting in March 2022 for 60 days. County staff made presentations to a number of groups in Spring of 2022 to solicit feedback on the plan including:

- Multnomah County Bicycle and Pedestrian Community Advisory Committee
- Multnomah County Disability Services Advisory Council
- Disability Rights Oregon

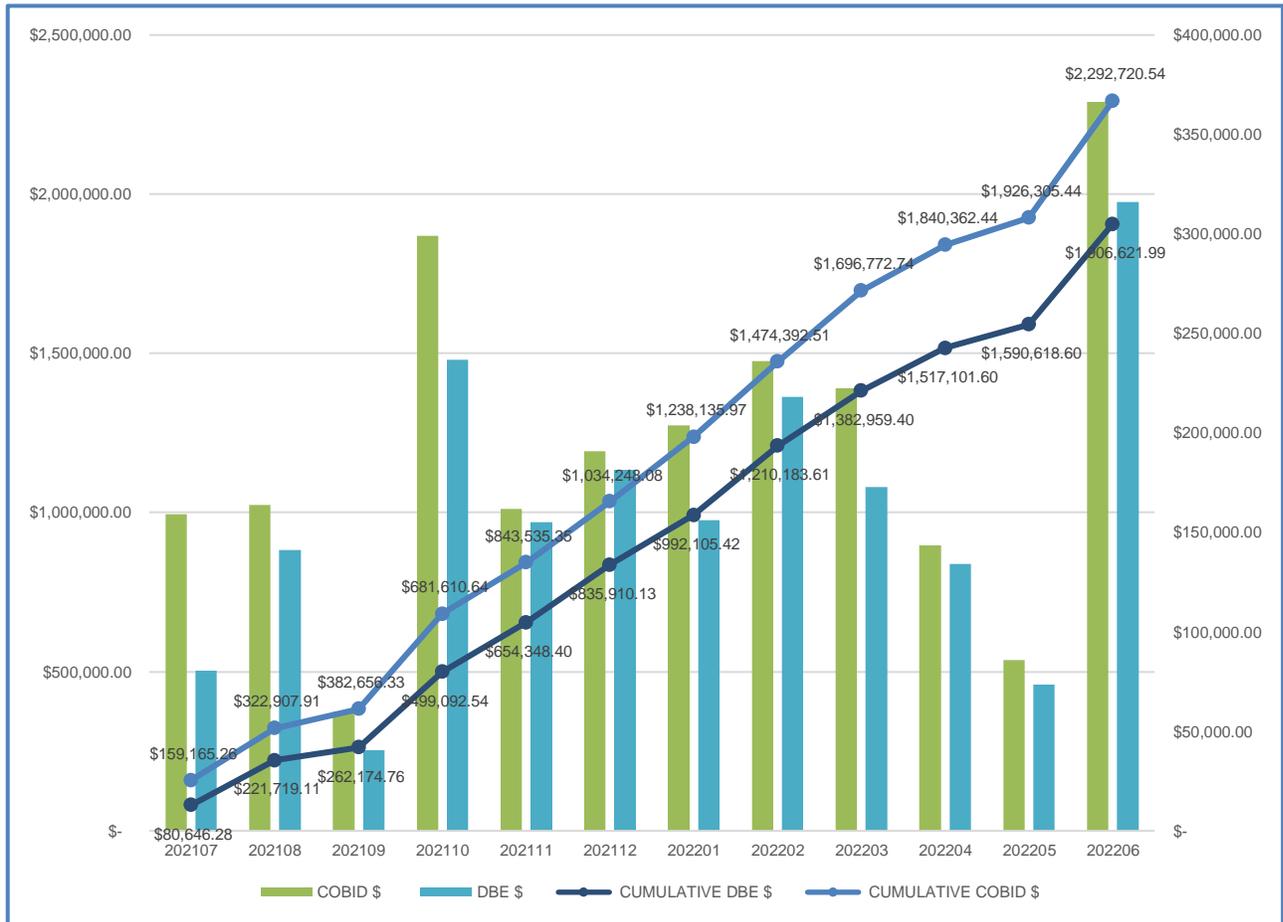
Feedback from the comment period is informing edits to the Plan and a final draft will be brought to the County Board of Commissioners in FY23.

Other Activities

Disadvantaged Business Enterprises (DBE)

During FY2022, the Transportation Division had 44 contractors that were certified DBE and/or COBID (Certification Office for Business Inclusion and Diversity) certified businesses providing services on 21 projects. COBID certification includes Minority, Women, Service-disabled Veteran, or Emerging Small Business enterprises. Cumulative DBE payments were \$1.9 million and cumulative COBID-certified business payments were \$2.3 million. The chart below shows all DBE and COBID-certified contractor payments in FY2022.

FY2022 DBE/COBID-certified Contractor Payments



Equal Employment Opportunity

During FY2022, 74% of all contractor hours and 52% of apprentice opportunities went to minorities. Female hours were low and there were no female apprentices so these are areas to seek improvement. Disaggregated contractor hours data, including apprentice hours, is provided in the tables below.

FY2022 Overall Contractor Hours by Race and Ethnicity

Trade	African American	Asian Pacific	White	Hispanic	Native American	Not Specified	Total
Carpenter		466	2,432	3,366			6,263
Cement Mason			327	262	153	10	751
Flagger	59		388	37			484
Highway/ Parking Striper	5		20	3		2	29
Ironworker			80				80
Laborer	34		2,556	2,631	30	326	5,577
Power Equipment Operator			507	7		355	869
Truck Driver			10				10
Painter				12,833			12,833
Fence Erector Metal			18				18
Total	98	466	6,337	19,137	183	692	26,913

FY2022 Overall Contractor Hours by Gender

Trade	Female	Male	Grand Total
Carpenter		6,263	6,263
Cement Mason	225	526	751
Flagger	168	316	484
Highway/Parking Striper		29	29
Ironworker		80	80
Laborer	662	4,915	5,577
Power Equipment Operator	7	862	869
Truck Driver		10	10
Painter		12,833	12,833
Fence Erector Metal		18	18
Grand Total	1,062	25,851	26,913

Americans with Disabilities Act (ADA)

Staff continued to work on finalizing the ADA Transition Plan and seeking public comment (see Public Engagement section).

A program offer was developed for the FY2023 County Budget to request funding for reconstruction of a portion of Tier 1 non-compliant curb ramps as identified through the ADA Transition Plan and demographic analysis was conducted to examine the equity impacts of the curb ramps identified.

Construction of ADA-compliant curb ramps were completed along a section of 238th Drive as part of the larger capital project.

National Environmental Policy Act (NEPA)

The Earthquake Ready Burnside Bridge (EQRB) Project worked on a Supplemental Environmental Impact Statement to address cost-saving measures in FY22. See the Public Engagement and Data Analysis sections of this report for more details.

Asset Management

The DCS Asset Management program is engaged in a planning project with a consulting firm that will provide direction and recommendations to mature asset management within our Transportation Division. Part of this process is to further goals laid out in our Asset Management policy regarding Risk Management and Decision Making. Our department has committed to making holistic transportation infrastructure decisions using a Triple Bottom Line approach with a focus on equitable outcomes and impacts, social equity, and an anti-racist lens to achieve racial justice. In regards to Risk Management we have committed to consider equity and the social context we operate within. Focusing and prioritizing these areas of our asset management system will enable the Transportation Division to consider Title VI protected classes within their decision-making in a more transparent and thoughtful way. In addition, this data driven approach will improve our assessment of disparate impacts when making maintenance, operational, and capital decisions for the community.

Data Analysis

Staff developed a series of service area maps presenting key demographic information for geographic areas where the County Transportation Division maintains assets or provides services. Maps were developed for service areas that correspond to programs based on funding sources, including: County-owned roads, Willamette River Bridges, and rural transit. Maps showing percentages of people of color and low-income households by Census Block Group were created for each service area. In addition, countywide maps were created to show limited English proficiency as well as people of color and low-income households. These maps will serve as a visual comparison for discussing public engagement strategies and investment priorities while the underlying Census data will be used for more specific analysis as needed. Specific socio-demographic analysis is conducted for projects at the concept/scoping phase as

well as during the environmental phase and in developing public involvement and communication plans.

Below are examples of data analysis that was conducted in FY2022:

Transit shuttle outreach analysis:

In FY21, demographic analysis was conducted to identify community groups to engage with in developing shuttle services and a community survey was developed in English and Spanish based on that analysis. Results of the surveys were analyzed in FY22 and were used to inform decisions on the route and schedule for the shuttle operations. There were 83 responses to the community survey, including 4 in Spanish. Survey respondents indicated the following:

- 35% of survey respondents identified as people of color (14.6% of respondents identified as American Indian or Alaska Native, 6.1% Latine or Hispanic, 6.1% Black or African American, 3.6% Asian, 2.4% Pacific Islander, 2.4% multiracial)
- 22% of respondents identified with having or living with a disability
- 55% of respondents worked in the shuttle service area
- 25% rode transit “most days” (post-3/2020)

An employer survey was also administered. Twenty-seven employers responded, with company sizes ranging from 5 to 1,224 employees. Employers in the area include community-based organizations, such as the Native American Youth and Family Center.

Three route options were shared with the public in the survey. While there were some minor adjustments made for improved operations and reliability, the route option preferred by the largest share of respondents (36%) was the one that was adopted as the final shuttle route. (Note: 26% of the respondents had no preference on the route.) Respondents indicated much higher need for weekday service than weekend service, which led us to focus on weekday-only service.

Earthquake Ready Burnside Bridge:

The project team used demographic analysis that was conducted during previous years to guide continued public engagement on project refinement options during FY22. An analysis of DEI outreach results from Fall 2021 engagement around the cost saving measures was conducted and documented in the [Engagement Summary Report](#).

The table below shows the number of DEI participants in the online open house survey and in DEI discussion groups by community. The project team also assessed the number of DEI participants in this latest round of project outreach (Round 4) in comparison to the previous project engagement rounds in the second table below.

DEI Participants per Outreach Method in Round 4 Engagement

Community	# of Survey Respondents	# of Discussion Group Participants	Total Participants
Black and African American	N/a ^a	11	11
Native American	N/a ^a	6	6
Vietnamese	32	8	40
Chinese	32	11	43
Latinx	29	9	38
Japanese	40	10	50
Arabic	29	12	41
Russian	24	10	34
Total	186	77	263

^aSurvey responses generated specifically by DEI outreach efforts for the Black and African American and Native American communities were not explicitly tracked because these communities used the general English version of the survey.

DEI Participants per Outreach Round

Round of outreach	Timing	Total DEI participants reached
R4: Cost-saving measures	2021, November - December	243
R3: Bridge type selection	2021, February	210
R2: Recommended Preferred Alternative	2020, September	355
R1: Preferred Alternative evaluation criteria	2019, September	182

Project Achievements

The NE 238th Drive Improvement Project was completed providing a safe connection for pedestrians and bicyclists between Arata Rd and Oregon St while also making freight improvements. 10-foot shared paths for walking and biking were built on both sides of the street and separated from traffic lanes by a planting strip. Prior to the project, the road had no bike lanes and just a narrow sidewalk on one side. The project is located in a regionally designated equity focus area. The improvements created an opportunity to improve safety of all modes of transportation and improve access to adjacent businesses.

Staff Training

Fifteen of our staff participated in ODOT’s Civil Rights Training for Certified Local Public Agencies that was provided online in 2022 and took the knowledge test. These staff are responsible for coordinating Title VI, managing capital projects, contracting, and implementing our labor compliance program.

Multnomah County also continues to work on implementing its Workforce Equity Strategic Plan. Our Department completed an Equity Strategic Plan in January and staff have been participating in a series of 3 equity trainings and facilitated discussions. The sessions are: 1) Equity Common Language, 2) Intersectionality, and 3) White Supremacy Culture. These efforts help establish understanding and buy-in regarding the County's equity values and build the capacity of our staff to implement our Title VI Program.

Updates

There were no changes to staffing of the Title VI Program during FY2022.

Progress toward FY2022 Goals:

1. Complete an update of the Title VI Program Plan and engage staff and stakeholders in reviewing and editing the plan.

Over the past year, we have worked with our consultants to train key transportation staff on Title VI best practices and discuss gaps in our current Title VI program. We have worked on an action plan for incorporating disparate impact analysis into our decision-making processes and have drafted a Limited English Proficiency Plan to address identified gaps in our program.

We held two skills building work sessions with key Transportation, Communications, Equity, Health, and Asset Management/GIS staff. Our first work session in December 2021, focused on understanding equity analyses, including pre-analysis considerations, triggering criteria, and best practices and data needs. After the session, staff worked on defining service areas, mapping demographic information for these service areas, and discussing when and how analyses could be applied to our work.

Our second work session in March 2022, focused on language access and developing an LEP Plan. Staff were trained in four-factor analysis, language assistance measures, vital documents translation, and monitoring and dissemination. We had a self-assessment exercise to discuss current practices against what we had learned. After the session, staff worked on drafting a LEP Plan and identifying process gaps.

2. Develop an outward-facing Transportation Equity Framework and action plan with community input.

During FY2022, a project team of key staff met with our consultants to begin work on a new equity policy framework to guide our work in the Transportation Division. We have developed a plan for creating a Transportation Equity Workgroup that will invite members of the community to collaborate with County staff in developing the framework. We have created a draft outline for the Transportation Equity Framework, a draft workplan for the Workgroup, and developed draft definitions of "transportation equity" and "transportation disadvantaged persons" to provide a starting point for the Workgroup.

Our next steps are to refine the workplan and materials for the Workgroup and to open up a call for community members to apply to participate in the Workgroup. We also will be developing an engagement strategy with our contracted Community Engagement Liaisons to gather additional perspectives from BIPOC and underserved communities to include in the policy development.

3. Ensure Transportation Division staff participate in a Title VI refresher training and are provided training on the updates made to the Plan.

Staff participated in the ODOT provided Title VI/Civil Rights online training. In addition, key staff participated in training work sessions during our plan update. We are scheduling an additional training on the plan for more project management staff in November/December that will accommodate staff availability outside of the construction season.

Goals for FY2023

1. Continue work on an outward-facing Transportation Equity Framework and action plan with community input.
2. Continue refining the Title VI Program Plan in conjunction with the development of the Equity Framework and work on process improvements and identified gaps with staff.
3. Ensure Transportation Division staff participate in a Title VI refresher training and are provided training on the updates made to the Plan.