

Appendix S

Title VI Fare Equity Analysis

Provide a \$0 fare for Youth riding Sound Transit services with a valid Youth ORCA card.

Introduction

Sound Transit provides ST Express Bus service in Pierce, King and Snohomish Counties, Link Light Rail service in King County, and Sounder Commuter Rail service in King, Pierce and Snohomish Counties.

The Youth fare on all Sound Transit services is currently \$1.50. The proposed fare change would provide a \$0 fare for Youth riding these Sound Transit services with a valid Youth ORCA card. This will make Sound Transit services more accessible for Youth throughout the region.

FTA Title VI Equity Analysis Requirements

On October 1, 2012, the Federal Transit Administration published Circular FTA C 4702.1B. As stated on page 1, “The purpose of this Circular is to provide recipients of Federal Transit Administration (FTA) financial assistance with guidance and instructions necessary to carry out U.S. Department of Transportation (“DOT” or “the Department”) Title VI regulations (49 FR part 21) and to integrate into their programs and activities considerations expressed in the Department’s Policy Guidance Concerning Recipients’ Responsibilities to Limited English Proficient (“LEP”) Persons (70 FR 74087, December 14, 2005).

Section IV. 7. a. of this Circular lays out the requirement to evaluate fare changes:

Fare Equity Analysis

(1) Fare Changes. *The fare equity analysis requirement applies to all fare changes regardless of the amount of increase or decrease. As with the service equity analysis, FTA requires transit providers to evaluate the effects of fare changes on low-income populations in addition to Title VI-protected populations....*

(2) Data Analysis. *For proposed changes that would increase or decrease fares on the entire system, or on certain transit modes, or by fare payment type or fare media, the transit provider shall analyze any available information generated from ridership surveys indicating whether minority and/or low-income riders are disproportionately more likely to use the mode of service, payment type, or payment media that would be subject to the fare change. (p. IV-19)*

The Circular goes on to identify requirements for determining if fare changes will result in disparate impacts on minorities riders, or disproportionate impacts on low-income riders.

(a) Minority Disparate Impact Policy. *The transit provider shall develop a policy for measuring disparate impact to determine whether minority riders are bearing a disproportionate impact of the change between the existing cost and the proposed cost. The impact may be defined as a statistical percentage. The disparate impact threshold must be applied uniformly, regardless of fare media, and cannot be altered until the next Title VI Program submission....(p.IV-20)*

(f) Low-Income Disproportionate Burden Policy. The transit provider shall develop a policy for measuring the burden of fare changes on low-income riders to determine when low-income riders are bearing a disproportionate burden of the change between the existing fare and the proposed fare. The impact may be defined as a statistical percentage. The disproportionate burden threshold must be applied uniformly, regardless of fare media, and cannot be altered until the next program submission.

Sound Transit fare equity analysis policy

Sound Transit Board of Directors Resolution R2013-19 established policies for conducting equity analyses of fare changes impacting minority and low income populations. This policy establishes that Sound Transit will conduct a fare equity analysis during the planning phase of a potential fare change to determine whether the proposed fare change would have a disparate impact on minority populations and/or a disproportionate burden on low-income populations. If any disparate impact or disproportionate burden is found, Sound Transit will consider steps to avoid, minimize, or mitigate the adverse impacts and reanalyze the modified changes to determine if the impacts are removed or lessened.

Sound Transit's policy defines these impacts as follows:

A disparate impact occurs when the minority percentage of the population adversely affected by a fare change is greater than the average minority percentage of the population of Sound Transit's service area.

A disproportionate burden occurs when the low income percentage of the population adversely affected by a fare change is greater than the average low income percentage of the population of Sound Transit's service area.

Determination of No Disparate Impact/No Disproportionate Burden

This fare change will not result in a disparate or disproportionate impact.

This \$0 Youth fare will make Sound Transit services more accessible for Youth. Youth are more likely to be low-income and minority than the population as a whole.^{1 2}

Sound Transit will work with Metro and other regional ORCA agency partners to provide free ORCA cards to Youth riders. Sound Transit Fare Ambassadors will provide youth riding Link and Sounder with information on how to obtain and use an ORCA card.

¹ US Census Bureau, 2020: ACS 5-Year Estimates, S1701 – Poverty Status in the Past 12 Months, King County Washington.

² US Census Bureau, 2019: ACS 1-Year Estimates, S0201 – Selected Population Profile in the US, King County Washington.