

# ***TITLE VI PROGRAM UPDATE***

**Submitted in Fulfillment of Title VI of the Civil Rights Act of 1964  
and FTA Circular 4702.1B**



**2022**

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## **AGENCY INFORMATION**

The Central Puget Regional Transit Authority was incorporated on September 21, 1993 and operates under the Revised Code of Washington Chapters 81.104 and 81.112. Known locally as Sound Transit, the regional public agency has a mission to develop and deliver a regional public transportation system. The Sound Transit District is 1,087 square miles and includes Pierce, King and Snohomish Counties. Sound Transit builds and operates regional transit service including Link light rail, Sounder trains, ST Express Bus and Tacoma Link light rail. This service is in addition to local transit services provided in each of these three counties by other public transit operators.

Sound Transit is governed by an 18-member Board mostly made up of local elected officials proportional to the population included in the Sound Transit District. Three members are from Snohomish County; 10 from King County; and four from Pierce County. The last seat is held by the Washington State Secretary of Transportation.

The Board establishes policies and gives direction and oversight. It is empowered under state law to identify ballot measures for voter approval of regional transit projects and maintains the Long-Range Plan that identifies potential projects to submit to voters.

Sound Transit has several service provider partners. King County Metro, Pierce Transit and Community Transit provide bus services. King County Metro also provides Link light rail services and ADA complementary paratransit services for Sound Transit under an inter-agency agreement. Sound Transit also has agreements in place with the BNSF and Amtrak for the operations (BNSF) and maintenance (Amtrak) of its Sounder commuter rail service.

## **INTRODUCTION**

Sound Transit has prepared this updated Title VI Program in compliance with Title 49 CFR Section 21.9(b) and with the Federal Transit Administration (FTA) Circular 4702.1B "Title VI Requirements and Guidelines for Federal Transit Administration Recipients."

This plan was prepared to ensure that the level and quality of Sound Transit's services are provided in a nondiscriminatory, safe, reliable and equitable manner.

## **TITLE VI OF THE CIVIL RIGHTS ACT**

Title VI of the Civil Rights Act of 1964 provides:

*No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.*

The intent of Title VI is to remove barriers and conditions that prevent minority, low-income and persons with limited English proficiency (LEP) from equal access to public services and programs.

In operating a federally assisted program<sup>1</sup>, a recipient cannot, on the basis of race, color or national origin, either directly or through contractual means:

- Deny program services, aids or benefits.
- Provide a different service, aid or benefit, or provide them in a manner different than they are provided to others.
- Segregate or separately treat individuals in any matter related to the receipt of any service, aid or benefit.

## **GENERAL REQUIREMENTS**

This section addresses the General Requirements of FTA Circular 4702.1B. The following information addresses the reporting requirements as described under Chapter III of the Circular.

### **1. Title VI Notice to the Public**

A Title VI Notice is included on the Sound Transit website.

- The Title VI Notice is included onboard all ST Express, Link light rail and Sounder vehicles. The notice is posted on site at Sound Transit's publicly accessible offices.
- Sound Transit has a Title VI brochure, which is at the reception desk at Sound Transit's Union Station headquarters.
- Title VI and nondiscrimination provisions are included in Sound Transit's contract provisions as appropriate.

The Title VI Notice is included in this program submittal as Appendix A.

### **2. Title VI Complaint Process and Complaint Form**

The Title VI Complaint Process (Appendix B) and Title VI Complaint Form (Appendix C) are translated into Spanish, Chinese, Vietnamese, Tagalog, Korean and Russian. These documents are available to the public via:

- Sound Transit website
- By mail
- Sound Transit headquarters reception area

All Sound Transit Customer Service Representatives have received training to better assist passengers who wish to file a discrimination complaint.

### **3. Title VI Investigations, Complaints & Lawsuits**

A list of transit-related Title VI complaints and investigations is included in this program submittal as Appendix D.

No Title VI lawsuits were filed during this triennial period.

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<sup>1</sup> The Civil Rights Restoration Act of 1987 amended each of the affected statutes by adding a section defining the word "program" to make clear that discrimination is prohibited throughout an entire agency if any part of the agency receives Federal financial assistance.

#### 4. Public Participation Plan

In December 2011, Sound Transit adopted Resolution R2011-15 Inclusive Public Participation Policy to assure meaningful access to public involvement and community outreach programs for minority, low-income and LEP populations. The policy formally incorporated practices and strategies that have been in use and continued development since Sound Transit's initial program to build the regional transit system. The agency's Public Participation Plan (Appendix E) provides an overview of those practices and strategies for inclusive public participation.

Key features of the Inclusive Public Participation Policy are to ensure that Sound Transit's public involvement and community outreach programs are designed to meet the following goals, pursuant to Title VI of the Civil Rights Act of 1964:

- Providing services without regard to race, color or national origin.
- Promoting the full and fair participation of affected populations in transit decision-making.
- Preventing denial, reduction or delay in benefits related to programs and activities that benefit minority or low-income populations.
- Facilitating meaningful access to programs and activities by LEP persons.

The policy applies to planning and service aspects of Sound Transit projects. It reaffirms Sound Transit's commitment that it will continue to include low-income, minority and limited English groups in its public involvement and community outreach programs, including service changes, fare changes and future service planning.

As set forth in the policy, Sound Transit will continue to design public involvement and community outreach programs to engage diverse populations by:

- Meeting environmental justice requirements and LEP needs.
- Making materials available in multiple formats, holding meetings in accessible facilities and providing meeting and project information to underserved populations.
- Providing the public with innovative opportunities and methods for accessing agency and project information.
- Engaging diverse populations early in the planning and development process.
- Making information available to minority, low-income and LEP populations.

The Public Participation Plan provides a summary of the steps to ensure minority, low-income and LEP populations receive access to outreach activities. The plan outlines agency level strategies and tools designed to support more equitable engagement, current engagement tactics, examples of public participation, an overview of best practices and action items for future measurement and evaluation.

Sound Transit's comprehensive Public Participation Plan provides guidance to ensure more culturally responsive and culturally relevant engagement of minority, low-income, and LEP populations. Sound Transit's Office of Civil Rights, Equity and Inclusion serves as a resource to help ensure these populations are included in engagement planning efforts.

Sound Transit uses geographic information systems (GIS) mapping software to create maps that identify affected low-income, minority, and LEP communities. In 2021, the Agency also created an Equity Dashboard; an interactive data tool that features charts,

tables and maps that help users visualize the demographics, travel behavior, and travel needs of people throughout the Sound Transit district. It allows for data to be filtered by demographic identifiers such as race/ethnicity, gender, income, English language proficiency, etc. and is used to inform equity analyses and engagement strategies. The analysis is shared with staff working with affected communities.

During this reporting period Sound Transit developed, coordinated and documented outreach and public involvement activities for multiple construction projects, rail expansions, transit-oriented development projects, service and fare changes and station access improvements. Also included are engagement summaries from Sound Transit's capital program realignment process in which Sound Transit launched extensive efforts to inform and engage the public in the realignment process the Sound Transit Board initiated in response to financial pressures resulting from the Covid-19 pandemic and our fare enforcement/fare compliance policy development process which began in 2019. The fare enforcement/fare compliance policy has garnered a significant amount of public interest and was the Agency's first time strategically applying a racial equity lens to inform its public engagement approach.

## **5. Language Assistance Plan / Four-Factor Analysis and Implementation Plan**

Sound Transit has a Language Assistance Plan (Appendix F) in place to ensure that LEP persons have access to programs, services, and public participation opportunities. The following is a summary of the plan.

Sound Transit is committed to comply with Title VI and Executive Order 13166 to provide LEP populations with meaningful access to programs, services, and benefits. The following are key elements in Sound Transit's plan and actions for providing language assistance to LEP persons based on DOT LEP Guidance:

In accordance with FTA's policy guidance, the initial step for providing meaningful access to services for LEP persons and maintaining an effective LEP program, is to identify LEP populations in the service area and their language characteristics through analysis of available data. In early 2022, Sound Transit updated its Four Factor Analysis that relied on the most recent data available including:

- Sound Transit GIS, 2019 US Census American Community Survey
- Public school data on ESL students - Transitional Bilingual Education Program and Dual Language Programs for the 2019-2020 school year
- Rider surveys including origin and destination surveys.
- Surveys of front-line employees and contractors
- Interpreter request data through the county court system or other county services
- Internal data reflecting call center requests for language interpretation.

### Four-Factor Analysis

FTA requires that transit systems provide "meaningful access" for LEP populations. Meaningful access is based on four factors:

1. The number and proportion of LEP persons served or encountered in the eligible service population.
2. The frequency with which LEP individuals come into contact with Sound Transit's programs, activities and services.
3. The importance of Sound Transit's programs, activities and services to LEP persons.
4. The resources available to the recipient and costs.

In order to determine how to provide meaningful access, Sound Transit recently performed its Four-Factor Analysis. The analysis provides insight into the language groups in the Sound Transit District. Based on review of the four factors, the Language Assistance Plan was developed to help guide the work with LEP populations.

The six largest LEP language groups in the Sound Transit District are (in order): Spanish, Chinese (including Cantonese & Mandarin), Vietnamese, Russian (and other Slavic languages), Korean and Tagalog.

The percentage of the Sound Transit District LEP populations for the top six languages are as follows:

Spanish	30.04%
Chinese	13.65%
Other Asian and Pacific Island languages	10.31%
Vietnamese	9.42%
Russian, Polish, other Slavic languages	7.65%
Korean	6.64%
Tagalog	5.11%

Sound Transit determined the following:

- The six largest LEP language groups in the Sound Transit District are (in order): Spanish, Chinese (including Cantonese & Mandarin), Vietnamese, Russian (and other Slavic languages), Korean and Tagalog.
- While a wide array of LEP language groups is found throughout its service district, the largest group prevalent throughout the Sound Transit region is LEP Spanish speakers.
- Spanish speakers are the LEP group most commonly seeking language assistance services.
- While Spanish speakers and Chinese (Mandarin) are the two largest groups, Sound Transit is committed to address the needs of the variety of LEP groups throughout its region. For this reason, Sound Transit has a telephone interpreter service that can accommodate more than 100 languages. In addition, Sound Transit's website was redesigned in 2018 to include Google Translate, an integrated translation function that can automatically translate soundtransit.org content into 103 languages.
- Sound Transit's Community Outreach activities throughout each project's life cycle provide connections to community leaders and information regarding

- the LEP groups within each project area to reach all potential riders.
- Sound Transit continues to expand its non-English communications program in response to the demographic changes experienced in the region.

### Implementation Plan

Sound Transit efforts to retain successful programs and activities designed to meet the language needs of LEP populations and identify new areas of focus to further the agency's goal of providing LEP customers with meaningful access to Sound Transit programs and services.

Sound Transit balances its overall commitment to the various LEP groups in the region with improvements targeted to the most commonly spoken languages in the region.

Sound Transit will do the following:

- Begin to leverage the new tiered approach for identifying 'Vital Documents' which will help guide Sound Transit on when and where we need to provide translations.
- Develop and deepen relationships with organizations that serve LEP populations to ensure we are responsive to their unique needs.
- Be adept in responding to any LEP person.

Sound Transit uses many language-assistance measures including:

- **Telephone-based interpreters** - All Sound Transit staff and consultants have access to interpreters who speak up to 100 languages. Sound Transit information is provided by establishing a conference call between the non-English speaker, the interpreter and the customer service representative.
- **Staff training** - Community outreach staff and front-line staff including reception, customer service, station agents, and fare ambassadors are trained to ~~respond~~ **assist** LEP individuals in person and using the telephone language line.
- **Community or project specific materials** - All Sound Transit staff and consultants have access to translation services. Key materials for residents should be translated or include a language block for languages relevant to that geographic area.
- **Sound Transit integrated website translation** - To improve access and utility of the website for LEP persons, the Sound Transit website, [www.soundtransit.org](http://www.soundtransit.org), was redesigned in 2018 to include Google Translate, an integrated translation function that can automatically translate [soundtransit.org](http://soundtransit.org) content into 103 languages. In 2022 we also translated some of our basic how-to-ride information into the top six languages, which is linked in the sidebar cards in the right-hand column of [soundtransit.org/how-to-ride](http://soundtransit.org/how-to-ride).
- **In-person interpreters and customized translation services** - Sound Transit contracts with vendors that provide translation and interpretation services upon request. Sound Transit provides interpreters at public meetings on request. At meetings where the agency anticipates a large number of LEP community members, it will proactively



provide interpreters. As a part of its community engagement activities, Sound Transit is in contact with community representatives for whom a portion of their members are LEP persons and will provide interpreters based on their input.

- **Engage LEP populations directly to gain insight and understand needs-** Sound Transit surveys and meets with community organizations that serve LEP populations to assess, and where appropriate, implement expanded methods to serve LEP transit riders. Where possible, it employs methods to engage directly with LEP persons and obtain direct feedback.
- **Ticket vending machines** – ORCA, the region’s fare payment system will be updated as of May 2022. Once this upgrade is implemented, the new ticket vending machines will be available in the top six languages.

The Language Assistance Plan includes language assistance measures that Sound Transit has implemented as a result of the 2019 Four-Factor Analysis and includes measures that will be pursued as a result of the 2022 Four-Factor Analysis.

These measures include:

- **Worked to identify LEP language needs as new transit projects are being planned**
- **Developed guidance for the development of curriculum and the incorporation of LEP information into the Sound Transit employee environment** – To prepare staff ambassadors and other relevant staff to effectively engage and respond to LEP customers.
- **Updated the Sound Transit Editorial Style Guide, an instructional tool that outlines the look and content of materials produced by staff and contractors, to include the following:**
  - Information on how to access interpreters and translations
  - Guidance on using language blocks and the interpreter pictogram
  - Assistance on how to determine LEP persons in the project area. Providing this information early in the planning/outreach phase helps ensure equal access for all.
- **Utilization of the “I Speak” Language Assistance Card**– Sound Transit distributed this to operators of all modes. The cards are also available to other public facing staff including station agents, outreach staff, ambassadors and other staff that interact with the public.
- **Included language assistance information on print materials** - Sound Transit added the language line number, hours of operations, and six predominant languages on printed materials. The interpreter pictogram will be included in close proximity to the language line number.
- **Updated demographic survey questions to gather additional data** – This will provide a better understanding of the LEP populations served.
- **Development of the Language Access Toolkit** – Created by, and for, outreach and engagement staff. The LAT provides guidance and best practices around internal

processes and procedures specific to language access.

- **Development of term bank** – Created by engagement staff, the term bank provides consistent translation in Sound Transit’s 6 core languages for 100 technical and commonly used terms. This provides consistency for vendors when translating these terms and provides clarity to all LEP populations accessing translated materials.
- **Developed and published an Equitable Engagement Tool for agency staff** - Provides guidance and best practices to ensure that engagement activities are planned through a lens of equity and accessibility which includes considerations for LEP populations.
- **Identification of “vital documents”** in accordance with Title VI and Executive Order 13166 and Sound Transit’s Top Six languages. A plan for providing specific documents and resources is outlined in the Language Assistance Plan.

## 6. Minority Representation of Planning and Advisory Bodies

Sound Transit relies on the oversight and guidance from volunteers and works to ensure diverse representation on Sound Transit’s Citizens’ Accessibility Advisory Committee (CAAC), Community Oversight Panel (COP), and Diversity Oversight Committee (DOC) (Appendix G). A key consideration for all of these committees is representation spread across the three counties (King, Pierce and Snohomish) that comprise the Sound Transit District and the five subareas (Pierce, Snohomish, East King, North King and South King).

The recruitment processes for each of these committees are as follows:

### Citizens’ Accessibility Advisory Committee (CAAC)

The CAAC charter directs that the committee will have a maximum of 15 appointed members who must be riders with disabilities, seniors and professionals, volunteers or family members of people with disabilities or seniors. There are currently 10 voting members on the committee. The CAAC is currently recruiting new members with a priority focus on selecting people who represent diverse disability groups. If applicant numbers increase, racial diversity will be prioritized as secondary priority in the selection process. The committee is comprised of two appointed members from each of the five subareas and up to five at-large members. All members are appointed for two-year terms and can be invited to extend their term an additional term for up to two more years for a total of four years.

### Community Oversight Panel (COP)

In April of 2021, Sound Transit’s Board of Directors requested that staff recruit a more diverse group of applicants to the Community Oversight Panel (formerly the Citizen’s Oversight Panel). Immediately, staff reviewed its list of external stakeholders to which recruitment information was provided. Conferring with government and community relations staff, the list of stakeholders was increased to include more community-based organizations serving people of color, and a second recruitment drive was initiated. The panel’s application was also updated to include a question asking applicants to share how their participation on the panel would help the agency’s commitment to civil rights, equity and inclusion, and to request demographic information so the Board of Directors can understand the demographic make-up of its applicant pool.

In step with that work, staff reviewed agency legislation identifying the panel's responsibilities, structure, and eligibility and identified several areas for improvement. After approximately a year's worth of work, which included soliciting feedback from Board Members and the existing panel members, staff presented a resolution for consideration by the Board updating the panel's responsibilities, changing terms to allow for more flexibility, and reducing some potentially exclusionary eligibility requirements including removing the need to be a registered voter and therefore a citizen, all in the interest of attracting a slate of more diverse candidates. The Board approved these changes in March 2022 including updating the panel's name to the Community Oversight Panel, reflecting the eligibility change.

The COP is represented by at least two members from each of the five subareas. The recruitment process seeks to follow Board direction to: (1) establish a process to incorporate input from Board members within the subarea where recruitment is taking place, and (2) provide a process that is inclusive and allows for a diverse COP. The Community Oversight Panel has also switched to evening meetings once a month to be more attractive to a broader group of participants.

Vacancies on the panel are advertised to a wide audience by posting on the Sound Transit website and via social media; sending a news release to media outlets, including community groups serving diverse populations, and blogs and forums; and sending a flyer to jurisdictions, agencies, colleges and libraries within the subarea. The web posting, news release and flyer include a statement that persons of color and women are encouraged to apply. Sound Transit staff will also inform all Sound Transit Board members and the Sound Transit Diversity Oversight Committee members of the vacancy.

#### Diversity Oversight Committee (DOC)

The DOC is composed of members from throughout the Sound Transit District, and includes representatives from small business, trade and craft organizations, communities and community organizations in impacted neighborhoods, and other such interested parties as deemed appropriate by the CEO. Committee members are independent of Sound Transit, meaning they have no contracts with Sound Transit and no plan to compete for bid on Sound Transit contracts or subcontracts. The committee reflects the cultural and ethnic diversity of the communities in the Sound Transit District. Recruitment is especially made to the small and minority business, labor and community organizations that engage with Sound Transit's Office of Civil Rights, Equity & Inclusion and Office of Labor Compliance on issues regarding employment and contracting on a Sound Transit project.

## **7. Subrecipient Assistance and Monitoring**

Sound Transit does not have subrecipients.

## **8. Review of Facilities to be Constructed**

### **Operations and Maintenance Facility South**

A new Operations and Maintenance Facility (OMF) is needed in the South Sound to receive, store, and service a larger train fleet to support future light rail extensions to Tacoma, West Seattle and throughout the region. To build this new facility, Sound Transit needs approximately 60-70 acres near an operating light rail line. On December 16, 2021, the Sound Transit Board identified the South 336th Street site as the preferred alternative for the location of the OMF South based on the findings in the Draft Environmental Impact Statement and comments submitted by tribes, agencies and the public during the Draft EIS public comment period. Sound Transit is in the middle of an environmental review process and will continue to study the South 336th Street preferred alternative, along with two other sites, in the Final EIS. After Sound Transit issues the Final EIS in late 2022, the Board will select the project to be built.

The full OMF South Title VI Facility Equity Analysis can be found in Appendix H.

### **Maintenance of Way Facility**

A memo was prepared to evaluate the facility location for a near-term Maintenance of Way (MOW) facility in the North Corridor of Sound Transit's Service District in the context of Title VI of the Civil Rights Act. The near-term facility would be a temporary leased facility for a period of up to five years. The lease allows for an option to purchase the property if it is later determined that the site would be suitable for a permanent facility. The purpose of the memo is to determine whether the near-term facility location would result in a disparate impact on populations based on race, color, or national origin.

The full memo with project description, site selection process and results of the equity analysis can be found in Appendix I.

## **REQUIREMENTS FOR TRANSIT PROVIDERS**

### **9. Service Monitoring - System Wide Service Standards and Service Policies for Each Mode**

Sound Transit is required by FTA to measure the quality of service delivered to communities and to demonstrate that resources are distributed in a way that does not discriminate on the basis of race, color or national origin. The FTA is responsible for ensuring that federally supported transit services and related benefits are distributed by applicants and recipients of FTA assistance in a manner consistent with Title VI, Section 601 of the Civil Rights Act of 1964. While not originally required by Title VI of the Civil Rights Act of 1964, protections were extended to low-income communities under Executive Order 12898—*Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations*<sup>2</sup>, which is why this report includes an assessment of disproportionate burden on low-income populations as well as a disparate impact assessment for minority populations.

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<sup>2</sup> Summary of Executive Order 12898 - Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations | US EPA. (2013, February 22). Retrieved June 21, 2022, from US EPA website: <https://www.epa.gov/laws-regulations/summary-executive-order-12898-federal-actions-address-environmental-justice>

The Title VI Service Monitoring Report documents Sound Transit's compliance with FTA Circular 4702.1B by reporting results of performance monitoring and distribution of amenities across all modes of service (ST Express, Link light rail, Tacoma Link, and Sounder commuter rail)<sup>3</sup>. The purpose of the Title VI service monitoring requirement is to ensure that prior decisions related to the distribution of fixed route transit service and facilities have not resulted in a disparate impact or disproportion burden on protected populations. The report provides an overview of Title VI requirements as well as context for Title VI in Sound Transit's service area, details the methodology for analysis of demography, corridor descriptions, standards, and policy, and offers proposed next steps for Sound Transit to take.

This analysis includes all regular fixed routes and uses data from winter 2020 to winter 2021, which is the most recent and representative data of transit demand and typical service levels. It is important to note that while long-term ridership impacts of COVID-19 pandemic are still unknown, the short-term effects have been significant. Sound Transit modified service levels and schedules in response to the pandemic. Sound Transit monitors the service standards and service policies shown in the following table to evaluate results for minority or low-income populations compared to non-minority and non-low-income populations. The Service Monitoring Report distinguishes routes where minority and low-income service area populations exceed the Sound Transit district average. These route classifications are then evaluated by metrics included in the Board adopted Sound Transit Service Standards and Performance Measures. Where service metrics on routes serving minority or low-income populations perform lower than non-minority or non-low-income routes, strategies are identified for improving performance.

Service Standards Monitoring	Service Policy Monitoring
<ul style="list-style-type: none"> <li>• Passenger Load (Crowding)</li> </ul>	<ul style="list-style-type: none"> <li>• Escalator and Elevator Conveyance</li> </ul>
<ul style="list-style-type: none"> <li>• On-Time Performance</li> </ul>	<ul style="list-style-type: none"> <li>• Bike Rack Distribution</li> </ul>
<ul style="list-style-type: none"> <li>• Customer Complaints</li> </ul>	<ul style="list-style-type: none"> <li>• Bike Cage/Lockers Distribution</li> </ul>
<ul style="list-style-type: none"> <li>• Trips Operated as Scheduled</li> </ul>	<ul style="list-style-type: none"> <li>• Shelter Distribution</li> </ul>
<ul style="list-style-type: none"> <li>• Span of Service</li> </ul>	<ul style="list-style-type: none"> <li>• Seating/Bench Distribution</li> </ul>
<ul style="list-style-type: none"> <li>• Frequency</li> </ul>	<ul style="list-style-type: none"> <li>• Vehicle Assignment</li> </ul>
<ul style="list-style-type: none"> <li>• Service Availability</li> </ul>	

Based on analysis of a variety of data sources, it was determined that ST Express routes or stops/stations serving minority and low-income populations had the greatest number of disparate impacts or disproportionate burdens and instances where routes were not meeting service standards. This is a result of impacts from the pandemic, operator shortages, and the structure of

<sup>3</sup> Title VI Requirements and Guidelines for Federal Transit Administration Recipients | FTA. (2012). Retrieved June 21, 2022, from Dot.gov website: <https://www.transit.dot.gov/regulations-and-guidance/fta-circulars/title-vi-requirements-and-guidelines-federal-transit>

the Sound Transit system. Sound Transit contracts with three local transit agencies to operate ST Express service: Community Transit in Snohomish County, King Country Metro in King County and Pierce Transit in Pierce County. In effect, the ST Express routes operated by each local transit agency operate as a separate system, similar to the way a single agency may operate service out of multiple maintenance bases.

Many of the findings in this 2022 Title VI Service Monitoring Report are consistent with the findings identified in the 2019 Title VI Service Monitoring Report. Sound Transit's adopted 2022 Service Plan prioritized equity by restoring service and addressing findings from the 2019 Title VI Service Monitoring Report. However, beginning in Fall 2021, transit operator shortages led to emergency service reductions on ST Express. Consistent with national workforce trends, the operator shortages are long-term and by spring 2022 resulted in scheduled service reductions of approximately 10% system-wide, with higher levels of reduction on routes serving the South Sound region. While formalizing trip cancelations gave riders better schedule predictability, as schedules reflected the trips that actually could be operated, the reductions impacted many of the routes with planned service improvements. As a result of operator shortages, all adopted service improvements to ST Express in the 2022 Service Plan were deferred until operator availability improves.

The full report, including plans for mitigation of findings is included in Appendix J. The Board approved the results of the service monitoring program via Motion No. 2022-66 on August 25, 2022.

## **REQUIREMENTS FOR TRANSIT PROVIDERS (50+ Fixed Route / Peak Service in UZA of 200,000 +)**

### **10. Demographic and Service Profile Maps and Charts**

Demographic and Service Profile Maps and Charts are included in this program submittal in Appendix K.

### **11. Demographic Ridership and Travel Patterns**

Sound Transit has appointed a research project manager to oversee the agency's New Starts Origin and Destination "before" and "after" survey efforts. Additionally, the manager maintains a calendar with upcoming surveys, staff contacts and survey details outlined. The calendar was developed as a tool to help staff coordinate the agency's survey and outreach efforts as much as possible so that efforts are not at cross purposes and riders do not experience survey fatigue. There is also work being performed to house agency data in a more standardized and centralized manner.

Sound Transit collects demographic ridership and travel pattern data using an on-board Origin-Destination survey for each mode. These are done no fewer than every five years or when required by a federally funded project such as a New Start. The agency has conducted surveys in 2011-2012, 2015-2016 and 2018-2019 on modes of service.

In 2018 and 2019, Sound Transit conducted its last Origin-Destination survey of transit riders, the purpose of which was twofold:

- To provide data in support of the “before and after” study, which investigated the impacts of University Link (a major light rail transit extension that opened for service in early 2016).
- To collect information about rider characteristics on each mode for use in ridership modeling, equity analyses, and other research and reporting purposes.

The survey instruments collect data on origin and destination of the riders and their demographics. The data used for Title VI and Environmental Justice include demographic information on ethnic identification, language(s) spoken at home and annual household income.

The agency translated surveys and offered them in printed form in the languages identified in the Four Factor Analysis, including Russian, Vietnamese, Tagalog, Spanish, Korean and Chinese. When interviewers encountered passengers with a language barrier, they presented a “language handout” that noted the interviewer could provide a paper copy of the survey in one of the additional languages. The translated survey also included instructions for returning it by mail.

These surveys provide insight into rider demographics and trip details for use in analyses—including origin and destination and access and egress to stations/service, transfers, pay methods, etc. The next survey will be conducted in 2023 in preparation for the opening of the Lynnwood Link Extension and Federal Way Link Extension.

In summary, the agency is using data to understand ridership patterns and to help with future planning of the system build-out.

Sound Transit prepares frequent reports to provide demographic ridership and travel patterns by mode. Some highlights include:

- In 2019, Sound Transit saw a leveling of growth in ridership it had previously experienced across its modes. Link and Tacoma link saw growth of 1% and 4%, respectively, while Sounder remained flat and ST Express saw a drop of about 4% in its ridership.
- Sound Transit experienced ridership losses similar to those of every other transit agency as a result of the COVID pandemic. In fact, transit agencies in the Puget Sound region may have seen more precipitous losses than many other agencies as a result of the region’s strict lockdown rules, coupled with the region’s high-tech employers offering more lenient work-from-home policies. The various modes saw declines from 53% on Tacoma Link, to 64% on ST Express, 68% on Link and 73% on Sounder.
- Not surprisingly, but worth noting, with the exception of the impact of Link’s Northgate extension, the return of ridership has had an inverse relationship with the spread and containment of COVID and its variants. The widespread rollout of the COVID vaccine in April 2021 corresponded with increases in ridership, while the onset of the Delta variant led to ridership reductions. Ridership rose again as we emerged from the Delta variant and as we opened the Northgate extension which led to ridership increases through the end of 2021.

The full report can be found in Appendix L.

## **12. Update to the Disparate Impact and Disproportionate Burden Policy and Major Service and Fare Change Policy.**

In 2013, Sound Transit established policies for conducting equity analyses of Major Service Changes and Fare Changes impacting minority or low-income populations (R2013-18 and R2013-19).

Sound Transit Board of Directors Resolution R2013-18 established policies for conducting equity analyses of Major Service Changes impacting minority and low-income populations. A service change is defined as major if:

- Vehicle hours or a route change by 25% or more, or
- A stop or station location is eliminated or moves by more than half a mile.

Sound Transit Board of Directors Resolution R2013-19 established policies for conducting equity analyses of fare changes affecting 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.

The former policy defined impacts as follows:

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

In 2022, Sound Transit drafted a new policy R2022-19, that would consolidate, update, and replace R2013-18 and R2013-19. The new policy will better reflect our growing region and network of transit services. Future system expansion will bring significant changes as we open new Link and Stride stations and adjust existing bus service to better connect communities with new stations. The updated policy will better prepare the agency for evaluating potential changes in the next few years.

After researching how other transit agencies across the nation approach their policies to identify best practices, we updated our approach to how we determine significant changes to service, the way we define potential equity impacts, and added a new level of analysis to better evaluate system-wide impacts of multiple service changes together.

The policy changes are as follows.

- **Updated definition of low-income.**



Aligns with the poverty guidelines set by the Department of Health and Human Services utilized by the regional transit fare program to determine low-income reduced fare eligibility.

- **Determine if potential service change is “major”.**

The former policy measured “platform service hours,” which included time that buses and trains were traveling to/from maintenance bases in addition to time carrying riders. The new policy uses “revenue service hours” or the time that buses and trains carry riders. This update allows us to better measure changes in the amount of service actually delivered to riders. Second, we reduced the distance we can move a bus stop from half a mile to a quarter mile before causing a major service change. This update helps highlight changes to rider experience and access when evaluating potential stop location changes.

- **Establish a threshold of 5% for individual changes.**

In the former policy any numerical difference from system average, in practice 0% absolute difference, identifies a Title VI protected route. This new threshold establishes a more meaningful statistical comparison across our system, allowing us to better prioritize routes serving Title VI protected populations.

When a proposed major service change to a single line or route creates a potential adverse effect, a disparate impact or disproportionate burden occurs when the percentage of the adversely affected minority or low-income population in the service area of the line or route exceeds the percentage of the minority or low-income population within the Sound Transit district by at least five percentage points (e.g. 15 percent of the population adversely affected is low-income compared to a district low-income population of 10 percent).

- **Establish a systemwide analysis step with a threshold of 20%**

The former policy does not have this step. We believe this new analysis step will better measure how over time, individual changes create a cumulative effect on the communities we serve. The new analysis evaluates changes over the past two years together with potential changes in the next year. As part of this new step, we would measure two groups of changes, the impacts of service reductions AND the benefits of service improvement.

- When evaluating service reductions, a 20% more impact to Title VI protected populations identifies a potential equity impact.
- And when evaluating service improvements, a 20% less benefit to Title VI protected populations identifies a potential equity impact.

- **Establishes a 20% threshold of all fare changes**

When considering a fare increase, if the agency’s analysis indicates that the average percentage fare increase experienced by minority or low-income riders is 20 percent or greater than the average percentage fare increase experienced by non-minority or non-low-income riders, the change creates a disparate impact or disproportionate burden.

When considering a fare decrease, if the agency's analysis indicates the average percentage fare decrease experienced by non-minority or non-low-income riders is 20 percent or greater than the average percentage fare decrease experienced by minority or low-income riders, the change creates a disparate impact or disproportionate burden.

When considering a change in payment type or a change in fare media, if the agency's analysis indicates that the impact on minority or low-income riders is 20 percent or greater than the impact on non-minority or non-low-income riders, the change creates a disparate impact or disproportionate burden. To the extent the change to fare media will have any impact on the cost to ride transit, the incremental costs associated with the change will be considered as part of a fare increase or decrease analysis.

- **Establishes a 5% threshold for siting of maintenance facilities.**

A threshold and definition of "adverse effects" related to the siting of maintenance facilities was not included in the previous policy. The new policy identifies when adverse effects related to both direct costs, such as residential and business displacements, and indirect costs, such as construction impacts and public health risks, are greater than the benefits to the surrounding community associated with the proposed facility location.

The agency will conduct an equity analysis to determine any disparate impact for maintenance facilities that require the acquisition of land. A disparate impact occurs when the percentage of the minority population adversely affected by a maintenance facility location exceeds the percentage of the minority population of the Sound Transit district by at least five percent.

### **13. Public Engagement Process for Setting the Disparate Impact and Disproportionate Burden Policy and Major Service and Fare Change Policy**

In July of 2022, the Sound Transit board adopted R2022-19, a new Disparate Impact and Disproportionate Burden Policy which includes the Major Service Change Policy.

Prior to adoption, public engagement was conducted with community stakeholder groups including the Transportation Access Coalition and Citizens' Accessibility Advisory Committee. The general public was invited to provide comment on the draft policy via a dedicated policy page on the Sound Transit website. The website utilizes integrated translation services to translate content into 103 languages. The policy page and embedded survey was open for public comment for a period of two weeks. The survey was made available in the top six Title VI languages. A link to the website was shared on Sound Transit's social media platforms as well, in addition to a press release.

Responses to the draft policy were minimal with the majority of the relevant feedback focused on simplifying the policy language.

A copy of the Disparate Impact and Disproportionate Burden policy and documentation of associated board action adopting Resolution R2022-19 is included in Appendix M.

### **14. Service and Fare Equity Analyses**

The Service and Fare Equity analyses summarized below were conducted prior to the adoption of the new Disparate Impact and Disproportionate Burden Policy (R2022-19). Therefore, the analyses that follow were completed in accordance with policies; R2013-18 and R2013-19.

### **Service Equity Analyses**

As part of the annual Service Implementation Plan, Sound Transit conducts a service equity analysis to ensure changes in transit service are consistent with Title VI policies defined by the Federal Transit Administration and policies defined by the Sound Transit Board of Directors.

A Title VI analysis took or will take place on service changes between FFY2019-FFY2022. Documentation for each analysis showing that it was reviewed and approved by the Sound Transit Board is attached to each equity analysis document.

#### **FFY 2022---**

Of the eleven service changes analyzed, five are major service changes. Of the major service changes four are considered to be major service changes that affect areas with a higher-than-average minority or low-income population. One major service change did not affect areas with a higher-than-average minority or low-income population.

The following proposed changes affect service areas with a higher-than-average minority or low-income population:

#### **Route 592 Stop Addition at Tacoma Dome**

- **Based on rider feedback and the results of the equity analysis, this service change is not being implemented at this time.**
- Add new stop at Tacoma Dome for Sound Transit Route 592 between Dupont and Seattle, as well as new route alignment on SODO Busway in Seattle
- The Route 592 service area has a higher minority population when compared to Sound Transit District averages, as well as a higher low-income population when compared to Sound Transit District averages. This means there is both disparate impact and disproportionate burden.
- Passengers will benefit from improved connections to regional destinations via a new connection to Tacoma Dome station. Service reliability will also likely improve with the new SODO Busway alignment.
- Added stops will likely increase travel time on this route by approximately five to six minutes.

#### **Route 590 Service Increase**

- Increase of service on Sound Transit Route 590 to every fifteen minutes or better.
- Because this service change adds platform hours without taking away service from existing ST routes and improves service frequency for passengers, we have

determined there are no adverse effects. Therefore, there is no determination of disparate impact or disproportionate burden.

- Proposed frequencies include six to eight minutes during early morning, AM peak periods, and PM peak periods, every fifteen minutes during midday and weekend days, every thirty minutes during evenings, and every sixty minutes during weekend evenings.
- This change is necessary to improve service parity in the ST Express system and install a level of service in South King/Pierce Counties that rivals other key ST Express corridors such as the I-405 North Corridor and the I-5 North Corridor.
- NOTE: The implementation of this service change is delayed due to bus operator shortages.

### **Sounder South Service Restorations**

- Sound Transit will restore service to operate up to 13 round trips by September 2022.
- Because this service change adds platform hours, improves regional access, and restores Sounder S service to pre-pandemic levels without taking away service from existing ST routes, there are no adverse effects. Therefore, there is no determination of disparate impact or disproportionate burden.
- Transit service will be restored on Train 1507 (2:35 p.m. from Seattle to Tacoma) and its corresponding reverse train (1520, 4:06 p.m. from Tacoma to Seattle).
- This change is necessary to improve regional access for passengers and bring back level of service to pre-COVID-19 levels.

The following proposed changes affect service areas that do not have a higher-than-average minority or low-income population:

### **Route 535 Service Increase**

- Increase of service on Sound Transit Route 535 between Lynnwood and Bellevue. Midday and weekend service will be increased to every thirty minutes and Sunday service will be introduced.
- The Route 532/535 service area has a lower minority population when compared to Sound Transit District averages, meaning there is no disparate impact. The service area also has a lower low-income population when compared to Sound Transit District averages, meaning there is no disproportionate burden.
- This change is necessary to create an all-day and all-week network for passenger convenience. Sound Transit is focused on key regional routes, like Route 535-Lynnwood-Bellevue, and proposed an increase in midday and weekend service.
- NOTE: The implementation of this service change is delayed due to bus operator shortages.

### **FFY 2021---**

Of the thirty-two service changes analyzed, nineteen were considered major service changes. Thirteen were considered minor service changes that would affect areas with a higher-than-average minority or low-income population. The nineteen major service changes were consolidated into six sections, which will be described below. *NOTE: Some service changes evaluated, were implemented in 2020 as emergency changes due to the immediate impacts of the COVID-19 pandemic. The analysis for those changes is included in the FFY 2020 section to reflect the first date of implementation.*

The following proposed changes affect service areas that have a higher-than-average minority or low-income population:

#### **Northgate Link Extension Opens**

- Three new Link stations added at the north end 1 Line: U-District, Roosevelt, and Northgate.
- The Northgate Link service area has a higher minority population when compared to Sound Transit District averages, as well as a higher low-income population when compared to Sound Transit District averages. This means that any change to Link service has the potential for a disparate impact or disproportionate burden; however, there are no adverse effects with the extension of Link to Northgate, Roosevelt and U District stations, as this is a service addition.
- Link will be extended 4.3 miles from University of Washington Station to Northgate Station. The travel time between the two stations will be seven minutes, with two intermittent stops at U-District and Roosevelt. At Roosevelt and Northgate, connections can be made to ST Express buses.
- Service will run every eight minutes during AM and PM peaks, as well as ten to fifteen minutes during midday and weekend time periods. Late Evening service will only operate every fifteen minutes under the current proposal. Should financial conditions improve, providing ten-minute evening service will be a priority.

#### **Route 586 Stop Addition**

- Add new stop at Federal Way Transit Center for Sound Transit Route 586
- The service area of Route 586 has a higher minority population when compared to Sound Transit District averages, as well as a higher low-income population when compared to Sound Transit District averages. This means there is both disparate impact and disproportionate burden.
- Bus frequencies will remain every thirty minutes in the peak direction.
- Route 586 will have longer travel times between Tacoma and U-District due to the stop at Federal Way Transit Center.
- Originally, we had proposed discontinuing Route 586. Due to a strong response for customers uncomfortable with the transfer, our new proposal is to retain September 2020 service levels on Route 586 while introducing a new stop at Federal Way

Transit Center in order to accommodate passengers who previously rode the now-suspended Route 197.

- This change is necessary to improve productivity of the corridor and to relieve ridership demand on Route 577 during peak periods.

### **Route 595 Stop Addition**

- **Based on rider feedback and the results of the equity analysis, this service change is not being implemented at this time.**
- Add new stop at Tacoma Dome Station for Sound Transit Route 586.
- The service area of Route 595 has a lower minority population when compared to Sound Transit District averages, meaning there is no disparate impact. The service area does have a higher low-income population when compared to Sound Transit District averages, meaning there is disproportionate burden.
- Bus frequencies will remain every sixty minutes in the peak direction.
- Route 595 passengers will experience fuller trips and slightly longer trip times with the additional stop.
- This change is necessary since Route 595 has had historically and current low ridership. Adding a stop at Tacoma Dome Station will allow for additional capacity on the Seattle-Tacoma corridor while conserving resources. Currently Pierce Transit 102, which operates between Gig Harbor and Tacoma, is suspended. Adding a stop at Tacoma Dome Station will provide a replacement for this suspended route.

### **North King County-Seattle Route Realignment (Routes 510, 511, 512, 513)**

- Truncation of Sound Transit Routes 511, 512, and 513 at Northgate Station, discontinuing service between Northgate and Downtown Seattle. Stop added on Sound Transit Route 510 at Montlake Terrace Freeway Station. Stop added on Route 513 at Lynnwood Transit Center and Ash Way Park and Ride. Stop removed on Route 512 at NE 145<sup>th</sup> Street.
- The service area of routes 510, 512, and 513 has a lower minority population when compared to the Sound Transit District averages, meaning there is no disparate impact. On the other hand, there is a higher-than-average low-income population when compared to Sound Transit District averages, resulting in a disproportionate burden. The service area of Route 511 has both a lower minority population and a lower low-income population when compared to district averages. Therefore, there is neither disparate impact nor disproportionate burden.
- Customers traveling on Routes 511, 512, and 513 must transfer to Link Light Rail at Northgate to continue to Downtown Seattle. Rush hour only buses from Northgate (Route 511 and 513) will run at fifteen-minute intervals during weekday rush hours, while Route 510 service will run every ten to twenty minutes during rush hours in the peak direction. Route 512 service will run every fifteen minutes during weekday peak

periods, early morning, midday, and Saturdays, while operating every thirty minutes during late evenings and Sundays.

- The increase in stops for Routes 510 and 513, as well as the required transfer between ST Express Buses (excluding the 510) and Link at Northgate will lead to increased travel times on ST Express routes.
- As mitigation, Link service will provide fast and efficient service between Northgate and Downtown Seattle, with stops at destinations not previously served by ST Express buses, such as the University of Washington and Capitol Hill.
- These changes are necessary to provide consistent service levels from Snohomish County by leveraging the new Link extension at Northgate and conserving resources.

The following proposed changes affect service areas that do not have a higher-than-average minority or low-income population:

#### **Route 522 Service Truncation**

- Truncation of Sound Transit Route 522 to Roosevelt Station, discontinuing service between Roosevelt and Downtown Seattle.
- The service area of Route 522 has both a minority population and low-income population lower than district averages. Therefore, there is neither disparate impact nor disproportionate burden.
- Customers traveling to Downtown Seattle from communities along SR 522 (i.e. Woodinville, Bothell, Kenmore, Lake Forest Park) must transfer to Link Light Rail at Roosevelt to continue to Downtown Seattle. Midday, evening, and weekend service levels have been improved, now operating every 15 minutes.
- Due to the necessary transfer, travel times may increase between two and ten minutes. The transfer will require someone to walk between one and two blocks. Rush hour frequency will also be reduced in order to provide higher midday, evening, and weekend frequency. King County Metro will continue to provide parallel service on the corridor, supplementing Route 522 during rush hour.
- As mitigation, Link service will provide fast and efficient service between Roosevelt and Downtown Seattle, with stops at destinations not previously served by ST Express buses, such as U-District and Northgate.
- This change is necessary since it conserves resources by leveraging the new Northgate Link extension while providing consistent service levels. Furthermore, King County Metro Routes 322 and 361 will also connect with Link at Northgate and Roosevelt stations, improving capacity on SR 522 while also providing access to destinations near Downtown Seattle.

#### **Route 556 Restoration**

- Restore Sound Transit Route 556 between North Seattle and Issaquah. Route will operate from U-District Link Station to Issaquah Highlands Park and Ride.

- The service area of Route 556 has both a minority population and a low-income population lower than district averages. Therefore, there is neither disparate impact nor disproportionate burden.
- Service will run every thirty minutes in the peak direction (to Seattle AM, to Issaquah PM). Riders will need to transfer to Link Light Rail to access Northgate, where Route 556 terminated pre-pandemic.
- This service change is necessary since ending at U District Station will provide consistent service levels to and from Bellevue and Issaquah in September 2021, while still leveraging the new Link extension and conserving resources.

### **FFY 2020---**

Of the ten service changes analyzed, five are considered major changes that affect areas with a higher-than-average minority or low-income population. Three of those major changes will be discussed together. The other five service changes are considered minor service changes that affect areas with a higher-than-average minority or low-income population. Furthermore, there were seventeen major service changes implemented as emergency changes due to the impacts of the Covid-19 pandemic that were not analyzed during the planning process in the 2021 Service Plan. These changes were broken into eight sections. All major changes are described below:

The following proposed changes affect service areas that have a higher-than-average minority or low-income population:

#### **North Eastside Mobility Plan**

- The new North Eastside Mobility Plan consolidates Routes 540 and 541 into a new route: Route 544.
- The Route 544 service area has a lower minority population when compared to the Sound Transit District averages, meaning there is no disparate impact. On the other hand, there is a higher-than-average low-income population when compared to Sound Transit District averages, resulting in a disproportionate burden.
- Customers served by Overlake Transit Center and Overlake Park and Ride will no longer have a one-seat ride to the U-District. To access the U-District, riders must transfer to ST 542 or KCM 255 at the SR-520/NE 40th St freeway stop, Yarrow Point freeway station, or Evergreen Point freeway station. Riders traveling to/from Kirkland Transit Center and South Kirkland P&R can use King County Metro 255 but must transfer at Montlake Triangle to access U-District.
- This routing adjustment will impact approximately 250 Route 540 riders and 350 Route 541 riders.
- As mitigation, Sound Transit is working with King County Metro to move the terminus of KCM Route 255 from Montlake Triangle to the U-District. In the meantime, Route 255 will provide 12-minute peak service to Montlake Triangle, which is a significant improvement over Route 540, a peak-only service. A westbound trip will also be added on Route 542 between Redmond TC and the U-District, to provide more capacity for riders of the former Route 541 during the PM peak period.



- This change is necessary as it will create for better non-stop connections between the underserved transit market of South Lake Union and the suburbs on the east side of King County.

### **Route 566 Stop Discontinuation**

- Route 566 between Kent and Bellevue will no longer serve stops at Kennydale and Newport Hills.
- Route 566 service area has a higher minority population when compared to Sound Transit District averages. Therefore, there is a determination of a disparate impact. The impacted area's low-income population is lower than the district average, meaning there is no disproportionate burden.
- Route 560 will continue to serve these stops, as will King County Metro Routes 111, 167, and 342. The 1,341 Route 566 riders from other stops will benefit from faster travel times. Only 16 boardings a day occurred at the two stops for Route 566.
- In the off-peak direction, riders will need to wait up to 15 minutes for a Route 560 bus. Most customers will see no change or reliability improvements.
- This change is necessary due to the lack of Route 566 riders using these stations, as well as the reliability improvements brought upon by the stop discontinuations.

### **Souder North Trip Reductions**

- Souder North will have its number of weekday trips reduced from eight to four.
- The Souder North service area has a lower minority population when compared to Sound Transit District averages, meaning there is no disparate impact. The service area does have a higher low-income population when compared to Sound Transit District averages, meaning there is disproportionate burden.
- Customers in Everett may take Sound Transit Route 510 to access Downtown Seattle. Customers in Mukilteo may take Community Transit Route 417 to access Downtown Seattle. Customers in Edmonds may take Community Route 416 to access Downtown Seattle.
- Service will continue to only be provided in the peak direction, and trains will run every sixty minutes instead of every thirty (two southbound trains and two northbound trains).
- This change is necessary due to low ridership along the route, along with possible conservation of resources.

### **Souder South Trip Reductions**

- March 2020: Reduce number of weekday trips from twenty-six to fourteen.
- September 2020: Increase number of weekday trips from fourteen to eighteen, but further reduce number of weekday off-peak trips.

- The Sounder South service area has a lower minority population when compared to Sound Transit District averages, meaning there is no disparate impact. The service area does have a higher low-income population when compared to Sound Transit District averages, meaning there is disproportionate burden.
- Weekday off-peak trips will be reduced from three trips a day to one trip a day. Weekday peak service will operate every twenty to forty-five minutes.
- As mitigation, service on Sound Transit Route 578 will increase in the Southbound direction during PM hours to continue coverage during times Sounder South is not operating. Sound Transit Route 590 has also been restored to provide increased service in the Northbound direction during AM hours.
- This change is necessary to accommodate shifting demand during the COVID-19 pandemic.

### **North King County-Seattle Trip Reductions**

- Reduce the number of daily weekday trips on Sound Transit Route 510 from forty-two trips to thirty trips. Reduce the number of daily weekday trips on Sound Transit Route 511 from thirty-eight trips to twenty-eight trips. Reduce the number of daily weekday trips on Sound Transit Route 513 from twenty daily trips to twelve daily trips. Restore the number of daily weekday trips on Sound Transit Route 512 to its original number of 107 daily trips.
- The service area of routes 510, 512 and 513 has a lower minority population when compared to the Sound Transit District averages, meaning there is no disparate impact. On the other hand, there is a higher-than-average low-income population when compared to Sound Transit District averages, resulting in a disproportionate burden. The service area of Route 511 has both a low minority population and a lower low-income population when compared to district averages. Therefore, there is neither disparate impact nor disproportionate burden.
- AM rush hour frequencies on Route 510 will decrease from ten minutes to ten to thirty minutes. AM rush hour frequencies on Route 511 will decrease from fifteen minutes to between twenty and thirty minutes. Early AM frequencies on Route 513 will decrease from thirty minutes to sixty minutes. AM rush hour frequencies will decrease from fifteen minutes to thirty minutes, and PM rush hour frequencies will decrease from between twenty and thirty minutes to sixty minutes.
- These reductions are necessary since it will allow Sound Transit to allocate more resources on Route 512, which provides all day service to the North Interstate 5 corridor.

### **Seattle-Redmond Route Reductions/Suspensions (Routes 541, 542, 544)**

- Service is suspended on Sound Transit Routes 541 and 544 between Seattle and Overlake. Service is reduced from ninety to eighty-one trips on Route 542 between U-District and Redmond Transit Center.
- The Seattle and Redmond service areas have a higher minority population when compared to Sound Transit District averages, meaning there is disparate impact. The

service area does have a lower low-income population when compared to Sound Transit District averages, meaning there is no disproportionate burden.

- Route 542 customers will see a decrease in frequency during the AM and PM rush, as service has been reduced from fifteen to twenty minutes.
- Instead of Route 541, riders traveling from Overlake Park-and-Ride to the U District may connect with Route 542 by walking or taking KCM Rapid Ride B Line or Route 269 to the SR 520 at NE 40th St. freeway stop. This involves a new transfer and longer walk access times. Instead of Route 544, riders traveling from Overlake Park-and-Ride to South Lake Union may connect with Route 545 by walking or taking KCM Rapid Ride B Line or Route 269 to the SR 520 at NE 40th St. Freeway stop. This involves a new transfer and approximately a one-block walk.
- This change is necessary since the suspension of routes allows for Sound Transit to focus resources where they are most needed on the 520 corridor and avoid further service reductions on other routes.

#### **Route 567 Service Suspension**

- Service suspended on Sound Transit Route 567 between Kent and Overlake.
- The Route 567 service area has a higher minority population when compared to Sound Transit District averages, as well as a higher low-income population when compared to Sound Transit District averages. This means there is both disparate impact and disproportionate burden.
- Riders traveling between Kent and Bellevue/Overlake in peak hours will need to use Route 566, which will add up to 13 minutes of travel time in the evening rush hour.
- As mitigation, there will be greater frequency and coverage on Sound Transit Routes 560 and 566.
- This change is necessary since Route 567 primarily serves commuters, and ridership on this route is not expected to rebound in 2021 due to workers continuing to work remotely. Furthermore, Suspending Route 567 allows for greater frequency and coverage on Routes 560 and 566 than will otherwise be possible.

#### **Pierce County-Seattle Service Reductions (Routes 586, 592, 595)**

- Service is reduced on Sound Transit Route 586 from sixteen to fourteen trips.  
Service is reduced on Sound Transit Route 592 from thirty-one to twenty-four trips.  
Service is reduced on Sound Transit Route 595 from ten to six trips.
- The service area of Route 586 and Route 592 has a higher minority population when compared to Sound Transit District averages, as well as a higher low-income population when compared to Sound Transit District averages. This means there is both disparate impact and disproportionate burden. The service area of Route 595 has a lower minority population when compared to Sound Transit District averages, meaning there is no disparate impact. The service area does have a higher low-income population when compared to Sound Transit District averages, meaning there is disproportionate burden.

- Frequencies on Route 592 in the AM and PM peak hours will be reduced from fifteen to twenty minutes. Frequencies on Route 595 in the AM and PM peak hours will be reduced from thirty to sixty minutes.
- As mitigation, Route 590 and Route 594 will continue to have higher levels of service throughout the day, matching the demand on these routes.
- This change is necessary since Routes 590 and 594 have had higher ridership compared to other routes during the COVID-19 pandemic. As such, Routes 590 and 594 will continue to have higher levels of service.

The following proposed changes affect service areas that do not have a higher-than-average minority or low-income population:

#### **Additional Auburn Weekend Service**

- Sound Transit will convert weekend trips from Route 577 to Route 578.
- There are no adverse effects as a result of this service change. Therefore, there is no determination of disparate impact or disproportionate burden.
- Customers will experience a greater number of Route 578 trips, with the amount of weekend service between Federal Way and Auburn doubling, while the number of weekend trips between Auburn and Puyallup will remain the same. Weekend Route 577 routing in Seattle will be eliminated, including a stop at 4<sup>th</sup> Avenue and Pine Street.
- This change will increase the number of available trips between Auburn, Federal Way, and Seattle and will benefit a service area with high minority and low-income populations.
- This change was not implemented due to impacts of the COVID-19 pandemic.

#### **Route 532/535 Trip Reductions**

- Reduce weekday trips on Route 532 from forty-one to twenty trips. Eliminate AM service from Bellevue to Everett and PM service from Everett to Bellevue. Reduce weekday trips on Route 545 from sixty-five to forty-six trips.
- The Route 532/535 service area has a lower minority population when compared to Sound Transit District averages, meaning there is no disparate impact. The service area also has a lower low-income population when compared to Sound Transit District averages, meaning there is no disproportionate burden.
- Customers will experience higher wait times during weekday and weekend hours, with bus frequencies on Route 532 being lowered from every ten minutes to every twenty minutes during the AM and PM rush. Furthermore, Route 535 will have a service reduction from thirty minutes to sixty minutes during early AM and midday hours.
- Riders commuting from Bellevue to Everett will need to use Route 535 and transfer to Route 512 at Lynnwood Transit Center to complete their trip.

- This change is necessary to preserve coverage along the 405 north corridor while adjusting services due to lack of demand brought upon by the COVID-19 pandemic.

#### **Northgate-Eastside Service Suspensions (Routes 555, 556)**

- Service suspended on Sound Transit Route 555 between Northgate and Bellevue, as well as Sound Transit Route 556 between Northgate and Issaquah.
- The Route 532/535 service area has a lower minority population when compared to Sound Transit District averages, meaning there is no disparate impact. The service area also has a lower low-income population when compared to Sound Transit District averages, meaning there is no disproportionate burden.
- Riders can use King County Metro Route 41 and transfer to a Bellevue-bound 550 or an Issaquah-bound 554 in Downtown Seattle. Bellevue-bound riders can also use King County Metro routes 67 and 271 with a connection in the University District. The transfer will add travel time and require walking between stops.
- This change is necessary since Routes 555 and 556 primarily serve commuters, and ridership on these routes is not expected to rebound in 2021 due to workers continuing to work from home.

#### **FFY 2019-**

Three of the five proposed major service changes affect service areas with a higher-than-average minority or low-income population. This section briefly describes impacts and mitigation for each proposed change.

The following proposed changes affect service areas that do not have a higher-than-average minority or low-income population:

#### **Route 550 (Bellevue – Seattle) Moves to Surface Streets**

- Route 550 service area has both a low-income population and minority population that are slightly above their respective averages for the Sound Transit District, resulting in a disparate impact and disproportionate burden.
- Customers will experience longer travel times and decreased reliability through downtown Seattle because surface streets are subject to more congestion than the transit tunnel, which now serves light rail only. Boarding and alighting locations will change.
- This routing adjustment will impact all 9,000 Route 550 customers riding to or from downtown Seattle (87% of total route ridership) and may decrease travel time reliability.
- As mitigation, additional buses and operating hours will be added to the route. These resources are expected to absorb additional run time and maintain reliability without eliminating Route 550 trips. In addition, targeted outreach will be conducted along the route with three street team shifts at all tunnel stations, including at midday when more diverse populations are likely traveling. Handouts will also be available onboard buses with translation information and a nondiscrimination policy.

- This routing change is inevitable due to the rail-only conversion of the transit tunnel.

**Route 513 (Everett – Seattle) begins at Seaway Transit Center in Everett**

- Originally, the proposed change will have been a major service change that eliminated the stop on Evergreen Way with no nearby replacement. This change will have a disparate impact on minority populations served by Route 513. After public comment opposed to the stop removal, Sound Transit modified the proposal and a stop was added back to Casino Road and Evergreen Way, making this a minor service change. Sound Transit decided to mitigate the change by continuing to serve the Evergreen Way area.
- Customers currently boarding at Evergreen & 79th in Everett will need to board at Casino Road and Evergreen Way (0.3 miles away).
- This change will impact about 66 out of 636 daily riders (10%) who currently board at Evergreen & 79th.
- As mitigation, outreach teams will engage riders online, in person with street teams at the stop, and via signage and handouts at stations and onboard buses.
- This change is necessary to better integrate service with partner agencies and provide better transfer opportunities to customers at the new Seaway Transit Center.
- The original proposal would not have served any stop on Evergreen Way. The stop at Casino Rd & Evergreen Way was added in response to public feedback during the outreach process.

**Route 580 (Lakewood – Puyallup) Eliminates Lower-performing Segments**

- The Route 580 service area has both a low-income population and minority population that are above their respective averages for the Sound Transit District Route.
- Customers currently riding between Puyallup and Lakewood will need to ride Sounder or use Pierce Transit Route 4.
- This change will impact about 35 of 560 daily Route 580 customers (6%).
- As mitigation, outreach teams will engage riders online, in person with street teams in Lakewood, and via signage and handouts at stations and onboard buses to inform customers of alternative options.
- Resources saved will be invested into a new trip on Route 592 (Du Pont-Lakewood-Seattle) which serves Lakewood and the SR 512 park-and-ride and overlaps with some of the same service area where service was reduced.
- This change will allow inefficient service to be reallocated to higher-performing service to serve more riders where demand is greatest.

The following proposed changes affect service areas that do not have a higher-than-average minority or low-income population:

**Route 555 (Northgate – Issaquah) Truncates at Bellevue Transit Center**

- The Route 555 impacted service area does not have a minority, or low-income population that is greater than that of the Sound Transit district average. Therefore, this change does not result in a disparate impact or disproportionate burden. Given that some individual census tracts in the impacted service area do have

disproportionate LEP populations, outreach about this change will be sensitive to those language needs.

- Customers currently riding east of Bellevue TC will need to use Metro Route 271 or 241 to reach their destination.
- This change will impact about 175 of 740 daily customers (24%).
- Resources saved will enhance service and reliability on Route 554.
- Outreach will engage customers online, in person with street teams at affected stops, and via signage and handouts onboard buses.
- This change will allow inefficient service to be reallocated to higher-performing service to serve more riders where demand is greatest.

### **Montlake Freeway Station (Seattle) Closure**

- Initially, Sound Transit only analyzed the service area of the Montlake Freeway Station and found no disparate impact or disproportionate burden. However, in order to more accurately capture the riders who transfer or alight at this stop and would therefore still be impacted, Sound Transit expanded the Title VI analysis. Two customer populations were analyzed for this service change. The Route 545 and 555 service area population was considered the impacted population. The Route 542 service area population was considered the benefited population, even though the geographic areas overlap significantly.
- The percentage of minority and low-income residents in each population was compared to the Sound Transit District overall to determine if a disproportionate benefit or impact existed.
- Both the impacted and benefited service areas have Title VI populations at or below the Sound Transit District average so there is no disparate impact or disproportionate burden.
- Customers currently riding between Montlake Freeway Station and Redmond will have reduced frequency but can use extended evening and weekend service on Route 542 through September 2019. Route 555 customers can use Metro Route 271.
- This change will impact about 350 of 10,300 daily customers (3%) on Routes 545 and 555.
- Outreach will engage customers online, in person with street teams at the stop, and via signage and handouts onboard buses.
- This change is inevitable due to the WSDOT construction closure of the freeway station.

### **Fare Equity Analyses**

A Title VI analysis was conducted on the following fare changes that took place or are planned between FFY2020-FFY2022. Documentation for each analysis showing that it was reviewed and approved by the Sound Transit Board is attached to each equity analysis

document.

FFY 2020 - One fare change was analyzed, and a fare equity analysis was conducted.

FFY 2021 – One fare change was analyzed, and a fare equity analysis was conducted, however, it will not receive board approval until after the submission of the Title VI program. Therefore, it will be included in the 2025 Title VI program update.

FFY 2022 (through September) – One fare change was analyzed, and a fare equity analysis was conducted.

### Reduction and Simplification of Reduced Fares on Sounder Commuter Rail

The Sound Transit Board adopted new fares for reduced fare riders on Sounder commuter rail in December 2020, and these fares were implemented in March 2021.

The purpose of this fare change was to make Sounder more accessible to Low-Income Adult, Youth and Senior riders and Riders with Disabilities, and to simplify fare payment for these customer groups. Sounder fares for these reduced fare customers were distance based as shown in the table below. Staff developed a proposal to simplify and reduce the fares for these riders and align them with the fares for these groups on other Sound Transit services – Link light rail and ST Express bus, as shown below.

Since this fare change was limited to a reduction in fares for low-income and other reduced fare riders, it was found to not result in a disparate impact or disproportionate burden.

The full analysis can be found in Appendix R.

<b>Rider Category</b>	<b>Previous Fares</b>	<b>Proposed Fares (aligned with Link and ST Express)</b>	<b>Fare Reduction</b>
<b>RRFP (Seniors and Riders with Disabilities)</b>	\$1.50 -- \$2.75	\$1.00	(\$0.50) -- (\$1.75)
<b>Youth</b>	\$2.50 -- \$4.25	\$1.50	(\$1.00) -- (\$2.75)
<b>ORCA LIFT (low-income adult)</b>	\$2.50 -- \$4.25	\$1.50	(\$1.00) -- (\$2.75)

### Free Youth Fares

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 \$0 fare for youth riding these Sound Transit services with a valid Youth ORCA card. This will make Sound Transit service more accessible for youth throughout the region.



This fare change will not result in a disparate impact or disproportionate burden. The full report can be found in Appendix S.

### **15. Board Action demonstrating the Board has Reviewed and Approved the Title VI Update Submittal**

Sound Transit's Board approved this 2022 Title VI Program submittal to the Federal Transit Administration at their meeting held on August 25, 2022. The Sound Transit Motion No. M2022-67, is included as Appendix T.

## LIST OF APPENDICES

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Appendix B	Title VI Complaint Process
Appendix C	Title VI Complaint Form
Appendix D	Title VI Complaints
Appendix E	Public Participation Plan Public Participation Resolution Racial Equity Toolkit Equitable Engagement Toolkit
Appendix F	Language Assistance Plan / Four-Factor Analysis “I Speak” Language Assistance Cards
Appendix G	Minority Representation of Sound Transit Planning and Advisory Bodies
Appendix H	Facility Equity Analysis – South Operations and Maintenance Facility
Appendix I	Memo: Title VI Facility Equity Analysis – North Maintenance of Way Facility
Appendix J	2022 Service Monitoring Report Final Board Action for Service Monitoring Report
Appendix K	Demographic and Service Profile Maps and Charts
Appendix L	Ridership Demographics and Travel Patterns
Appendix M	Resolution Setting Disparate Impact and Disproportionate Burden Policy
Appendix N	2020 Service Changes Board Resolution adopting 2020 Service Plan
Appendix O	2021 Service Changes Board Resolution adopting 2021 Service Plan
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Appendix Q	Northgate Link Extension Service & Fare Equity Analysis Board Approval of Northgate Service and Fare Equity Analysis
Appendix R	Souder Commuter Rail Fare Equity Analysis
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Appendix T	Board Motion for Title VI Program Submittal