What is a Service and Fare Equity (SAFE) Analysis?

As a recipient of federal financial assistance, Sound Transit must follow regulations set in Title VI of the Civil Rights Act of 1964. These regulations, along with Sound Transit policies, require Sound Transit to conduct service and fare equity analyses prior to adding a new service, implementing major service changes, or making changes to fares. These analyses determine the potential benefits and adverse effects of proposed changes and consider the impacts of these changes on two historically overlooked groups: minority and low-income communities. Public feedback helps shape these analyses and resulting changes. The analysis methodology and definitions for Disparate Impact, Disproportionate Burden, Major Service Change, and adverse effect are determined by Sound Transit’s Title VI Program.

A **Disparate Impact** occurs when a facially neutral policy or practice adversely affects members of a group identified by race, color, or national origin.

A **Disproportionate Burden** is when a facially neutral policy or practice adversely affects low-income populations more than non-low-income populations.

A **Major Service Change** is when weekly revenue hours on a route change by 25% or more, or a stop/station is eliminated or moved by more than ½ a mile for rail and ¼ mile for bus service.

Lynnwood Service Equity Analysis

The Lynnwood Link Extension will extend the 1 Line 8.5 miles to Lynnwood and Snohomish County, serving four new stations in 2024. As this project uses Federal Transit Administration Capital Investment Grants Program funding, Sound Transit conducted a service equity analysis for the proposed Lynnwood Link Extension (1 Line) and coordinated bus restructure following FTA requirements. The service equity analysis found no disparate impact or disproportionate burden associated with opening the Lynnwood Link Extension and coordinated bus restructure. Public engagement activities in 2022 and 2023 helped develop the proposed bus service changes.

Proposed changes to several ST Express routes are coordinated with the opening of Lynnwood Link. Consistent with ST’s newly adopted Disparate Impact and Disproportionate Burden policy (Board Resolution No. R2022-19) and FTA C 4702.1B, a Title VI service equity analysis was completed at two levels of analysis. The first individual route analysis evaluated each major service change individually. The second systemwide analysis compared benefits and impacts to Title VI protected & non-protected populations on all routes. A systemwide analysis examines all changes in the last two years and proposed changes for the upcoming year. In this analysis, Sound Transit evaluated service between 2021 and 2024. The individual route analysis found no disparate impact or disproportionate burden associated with opening the 1 Line and the coordinated ST Express bus changes. Consistent with the individual route analysis, the systemwide analysis did not find disparate impacts or disproportionate burdens on protected populations.
Lynnwood Fare Equity Analysis

Sound Transit conducted a Fare Equity Analysis of fare changes expected for riders resulting from Lynnwood Link Extension service changes.

Riders on ST Express routes being eliminated or terminated at the Lynnwood Link station (Routes 511, 512 and 513) will need to transfer to Link light rail or to ST Express Route 515. The table below shows the fare changes for ST Express riders making these transfers.

### Additional Fare for ST Express Riders Transferring to Link or Route 515 at Lynnwood

<table>
<thead>
<tr>
<th>Fare</th>
<th>Adult</th>
<th>Adult Cash/Ticket</th>
<th>ORCA LIFT</th>
<th>RRFP (Sr. &amp; Disabled) ORCA</th>
<th>RRFP (Sr. &amp; Disabled) Cash/Ticket</th>
<th>Youth</th>
</tr>
</thead>
<tbody>
<tr>
<td>Link</td>
<td>$0</td>
<td>$3.00</td>
<td>$0</td>
<td>$0</td>
<td>$1.00</td>
<td>$0</td>
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<td>($3.00)</td>
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<tr>
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<td>$3.25</td>
<td>$0</td>
<td>$0</td>
<td>$1.00</td>
<td>$0</td>
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<td>($3.25)</td>
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</tbody>
</table>

Riders using ORCA cards carry a transfer credit valid for two hours equal to the ST Express fare, allowing them to continue their trip on Link or Route 515 from Lynnwood at no additional fare. This service change will only impact cash riders on the terminated or eliminated ST Express routes, because cash riders are not afforded this credit and will need to pay another fare to continue their trip.

The data used in this analysis originated from the 2019 origin-destination (O-D) survey conducted onboard ST Express bus Routes 511, 512, and 513. This survey showed low levels of cash payment on these routes, with no RRFP (Senior and Disabled) riders paying cash. All the riders paying cash were full-fare adults, none of whom were minority or low-income.

The Fare Equity Analysis shows that fare changes resulting from this service change will result in a one percent average fare increase for non-low-income and non-minority riders, while the average fare increase for low-income and minority riders will be zero. Therefore, the fare change will not have a disproportionate burden on low-income riders nor a disparate impact on minority riders.

To mitigate the impacts on cash riders, ST will undertake efforts to make it easy for cash riders to adopt the use of ORCA cards for fare payment. ORCA card fare payment will enable riders to receive full transfer value between modes and experience no fare increase.